

Agent, defendant STEVEN KUCAN was responsible for obtaining, storing and controlling office equipment and supplies utilized by ICE-NY.

c. Ebay, Inc. ("eBay") hosted a website that allowed individuals to post items for sale to potential buyers who bid on the price to win the right to purchase the items.

The Scheme

2. From in or about 2002 to in or about January, 2010, defendant STEVEN KUCAN used his position as a Special Agent and Supervisory Special Agent to embezzle, steal, purloin and convert to his own use property belonging to ICE-NY, including the legacy INS.

3. It was a part of the scheme that defendant STEVEN KUCAN would receive, conceal and retain such property at his residence in Wood Ridge, New Jersey.

4. It was a further part of the scheme that defendant STEVEN KUCAN sold such property through an eBay account that defendant STEVEN KUCAN had established in the name of a relative in Jersey City, New Jersey, and that defendant STEVEN KUCAN sold such property through an additional eBay account held in the name of another individual. Defendant STEVEN KUCAN profited from the sale of such items on eBay.

5. It was a further part of the scheme that among the items that defendant STEVEN KUCAN stole from ICE-NY were printer cartridges, film, handcuffs, flashlights, gloves, duffle bags,

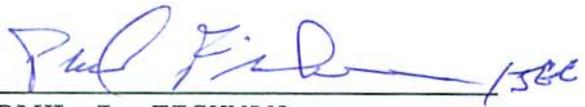
safety glasses/goggles, lifejackets, camera lenses, videocassette tapes, clothing, rapelling rope, rescue blankets, siren lights, tools, portable radios, and an immersion suit for cold water survival.

6. From in or about 2002 to in or about January 2010, in the District of New Jersey, and elsewhere, defendant

STEVEN KUCAN

knowingly and intentionally did embezzle, steal, purloin, and convert to his own use and the use of another, and without authority, did sell, convey, and dispose of a thing of value of the United States and a department and agency thereof, and did receive, conceal and retain the same with intent to convert it to his use and gain, knowing it to have been embezzled, stolen, purloined and converted.

In violation of Title 18, United States Code, Section 641 and Section 2.



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

STEVEN KUCAN

INFORMATION FOR

18 U.S.C. § 641 & § 2

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