

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
2021 MAY 11 A 11:53
CAROL L. MICHEL
CLERK

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR THEFT
FROM AN ORGANIZATION RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA

v.

KEVIN STIMAGE

*

CRIMINAL NO.

*

SECTION:

*

VIOLATION: 18 U.S.C. § 666(a)(1)(A)

*

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL MATERIAL TIMES HEREIN:

1. The Tangipahoa Parish Sheriff's Office (TPSO) was an agency of Tangipahoa Parish, a local government/municipality within the State of Louisiana, located in the Eastern District of Louisiana.

2. During calendar years 2019 and 2020, TPSO received federal funds from the United States Government in excess of \$10,000 annually.

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3. During calendar years 2019 and 2020, Tangipahoa Parish received federal funds from the United States Government in excess of \$10,000 annually.

4. TPSO was the chief law enforcement agency of Tangipahoa Parish. In that capacity, TPSO was responsible for, among other things, enforcing local and state laws, serving as the tax collector for Tangipahoa Parish, and operating incarceration facilities for Tangipahoa Parish.

5. In approximately 2004, **KEVIN STIMAGE**, began working as a deputy with TPSO and worked for TPSO until 2021. In 2020, **STIMAGE** was promoted to the rank of Captain. As such, **STIMAGE** was an agent of TPSO.

6. Beginning before January 1, 2018, and continuing through January 2021, **STIMAGE** was assigned to the transportation division of TPSO. The transportation division was primarily responsible for transporting TPSO inmates who needed mental health treatment to a local treatment facility.

7. Beginning before January 1, 2018, and continuing through January 2021, **STIMAGE** was expected to work Monday through Friday for eight (8) hours per day, for a total of 40 hours per week. **STIMAGE's** shift would begin sometime in the morning on each workday.

8. TPSO regulations prohibited deputies from working any other jobs for outside employers while on duty.

9. During the period of January 1, 2019 through December 31, 2020, **STIMAGE** worked an off-duty detail at an apartment complex in Tangipahoa Parish. **STIMAGE** was expected to be physically present at the apartment complex in his TPSO uniform with a TPSO-assigned vehicle for between 30-40 hours per week. This work was supposed to occur when **STIMAGE** was not on-duty with the TPSO. However, **STIMAGE** worked at the apartment

complex providing security for at least four (4) hours per day while purporting to be on-duty for TPSO.

10. During the period of January 1, 2019 through December 31, 2020, **STIMAGE** submitted false time sheets to the TPSO indicating that he had worked for the Sheriff's Office for 40 hours per week, when in reality, **STIMAGE** was working another job while purporting to be on-duty for the Sheriff's Office.

B. THE OFFENSE:

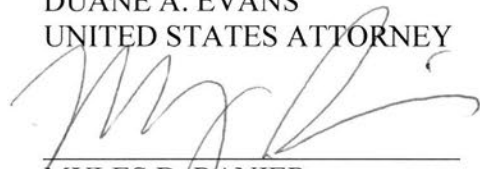
From at least January 1, 2019, and up to and including on or about December 31, 2020, in the Eastern District of Louisiana, the defendant, **KEVIN STIMAGE**, being an agent of an organization, State and local government and an agency thereof, to wit, an employee of the Tangipahoa Parish Sheriff's Office, did knowingly embezzle, steal, obtain by fraud and otherwise without authority knowingly did convert to the use of a person other than the rightful owner, property that is valued at \$5,000 or more and is owned by and under the care, custody and control of such organization, government, and agency, while such government and agency was in receipt of, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit: **STIMAGE** submitted false and fraudulent payroll sheets to the Tangipahoa Parish Sheriff's Office that fraudulently overstated the number of hours he worked and thereby was paid over \$5,000 to which he was not entitled in both 2019 and 2020, in violation of Title 18 United States Code, Section 666(a)(1)(A).

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Bill of Information are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.
2. As a result of the offense alleged in Count 1, the defendant, **KEVIN STIMAGE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offense.
3. If any of the above-described property, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

DUANE A. EVANS
UNITED STATES ATTORNEY



MYLES D. RANIER
Assistant United States Attorney

New Orleans, Louisiana
May 11, 2021