

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR OBTAINING PROPERTY
BY FRAUD CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
CAROL NEY	*	VIOLATION: 18 U.S.C. § 666(a)(1)(A)
	* * *	

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. **CAROL NEY** was a police officer of the Police Department of the City of Harahan, Louisiana, within the Eastern District of Louisiana. As an employee of the City of Harahan, **CAROL NEY** was an agent of a local government.

2. The City of Harahan was a political subdivision of the State of Louisiana and a local government within the meaning of Title 18, United States Code, Section 666(d)(3).

3. Between October 1, 2009 and September 30, 2010, the City of Harahan received at least \$56,645 in Federal funds under Federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of Federal assistance.

4. The City of Harahan was a subgrantee of a Victim Assistance Program, also referred to as a Crime Victims Grant, awarded by the Louisiana Commission on Law Enforcement and

Administration of Criminal Justice, for the period October 1, 2009 through September 30, 2010. The Crime Victims Grant provided Federal funds for personnel costs to provide services to victims of crime beyond those services provided by police officers of the City of Harahan during their regular working hours.

5. **CAROL NEY** served as both the project director and the victim assistance advocate who was supposed to provide direct services to victims of crime under the Crime Victims Grant.

6. Because the Crime Victims Grant was intended to supplement victim assistance services which were rendered by police officers during their regular working hours for which they were compensated by a salary from the City of Harahan, work under the Crime Victims Grant was to be performed during overtime hours. The officer who performed work on the Crime Victims Grant was entitled to be paid 1-1/2 times the officer's regular hourly rate of pay for such services performed after regular work hours. The City of Harahan paid the overtime rate to the police officer and then sought reimbursement by Federal funds.

7. Receipt of Federal funds under the Crime Victims Grant was conditioned on the City of Harahan maintaining records concerning overtime hours worked in providing assistance to victims of crime. .

8. **CAROL NEY** received an annual salary in the amount of \$33,040 in the years 2009 and 2010 from the City of Harahan. In addition, she was paid a total of \$10,840 by the City of Harahan, allegedly for victim assistance work performed by her after regular work hours during the period October 1, 2009 through September 30, 2010. Payments to **CAROL NEY** were based upon her submission of payroll forms certifying she had performed such services during overtime hours worked on specific days. The City of Harahan was reimbursed by Federal funds for the \$10,840 paid to **CAROL NEY**.

9. In fact, the payroll forms submitted by **CAROL NEY** were falsified by her, either because **CAROL NEY** did not perform the services, or because she performed them during regular work hours when she was being compensated by her regular salary from the City of Harahan.

B. THE VIOLATION:

Between on or about October 1, 2009 through on or about September 30, 2010, in the Eastern District of Louisiana,

CAROL NEY

an agent of local government, namely, the City of Harahan, which during a one year period commencing October 1, 2009 and concluding September 30, 2010, received in excess of \$10,000 under Federal programs involving grants, contracts, subsidies, loans, guarantees, insurance or other forms of Federal assistance, did obtain by fraud property valued at more than \$5,000 which was owned by, and under the care, custody and control of the City of Harahan;

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

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New Orleans, Louisiana
February __, 2011