

C119

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case:2:16-cr-20380
Judge: Murphy, Stephen J.
MJ: Grand, David R.
Filed: 05-23-2016 At 10:55 AM
INFO USA v STARKEYDARDEN (sk)

-VS-

VIOLATION: 18 U.S.C. § 666

D-1 CAROLYN STARKEYDARDEN,

Defendant.

INFORMATION

The United States Attorney charges:

COUNT ONE

18 U.S.C. § 666(a)(1)(A)-*Federal Program Theft*

D-1 CAROLYN STARKEYDARDEN

1. At all times material to this information, the Detroit Public Schools (hereinafter the "School District") was a government agency operating within Wayne County, Michigan in the Eastern District of Michigan.

2. From approximately 1968 through October 31, 2005, Carolyn StarkeyDarden was an agent of the School District.

3. From approximately 2005 through approximately 2012, Carolyn

StarkeyDarden was an agent of MI Learning Unlimited LLC, Grants-N-Such LLC, Dara Darden Educational Consultants, Achieving 180, and the Learning Unlimited Companies (hereinafter "The Companies").

4. At all times material to this information, that is, within each 12 month period during the calendar years, 2005, 2006, 2007, 2008, 2009, 2010, 2011 and 2012, the School District received benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of federal assistance.

5. From May 2005 through October 2012, based on false and inaccurate information provided by Carolyn StarkeyDarden, The Companies were approved by the Michigan Department of Education to provide supplemental educational services in the State of Michigan.

6. From between November 2005 through May 2012, The Companies entered into contracts with the School District to provide supplemental educational services.

7. From approximately 2006 through 2012, Carolyn StarkeyDarden, as the agent of The Companies submitted fraudulent invoices for payment to the School District for supplemental services that had not been rendered to the students in the School District.

8. From on or about March 2006 through October 2012, the School District

issued checks to The Companies for supplemental educational services that were not, in fact, rendered to students in the School District.

9. During the course of her criminal scheme Carolyn StarkeyDarden obtained at least \$1,275,000 from the Detroit Public Schools by fraud.

10. From on or about May 2006 through May 2012, in the Eastern District of Michigan, defendant Carolyn StarkeyDarden, being an agent of The Companies, did steal, obtain by fraud, and intentionally misapply property worth at least \$5,000 which was under the ownership, care, custody and control of the School District.

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

FORFEITURE ALLEGATION

(18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461(c))

1. The allegations contained in Count One are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 666 set forth in Count One of this Information the defendant, CAROLYN STARKEYDARDEN, shall forfeit to the United States of America, 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 the offenses, including, but not limited to:

- Twenty Thousand Five Hundred Seventy Dollars and Fifty-Six Cents (\$20,570.56) in U.S. Currency from JP Morgan Chase Bank Account #XXXXXX3545 titled to Grants N Such, LLC, d/b/a MI Learning Unlimited, LLC;
- Twenty Three Thousand One Hundred Forty Four Dollars and Sixty-Two Cents (\$23,144.62) in U.S. Currency from JP Morgan Chase Bank Account #XXXXXX3029 titled to The Learning Unlimited Companies, LLC;
- Thirty One Thousand Forty One Dollars and Fifty-Seven Cents (\$31,041.57) in U.S. Currency from JP Morgan Chase Bank Account #XXXXXXX1616 titled to The Learning Unlimited Companies, LLC;
- Fifty Five Thousand Three Hundred Ninety Three Dollars and Ninety-Two Cents (\$55,393.92) in U.S. Currency from JP Morgan Chase Bank Account #XXXXXXX6520 titled to Grants N Such, LLC d/b/a MI Learning Unlimited, LLC;
- Twenty Eight Thousand Six Hundred Eighty Nine Dollars and Sixty-Six Cents (\$28,689.66) in U.S. Currency from JP Morgan Chase Bank

Account #XXXX1175 (*formerly Bank One*) titled to Carolyn StarkeyDarden;

- Eighty Four Thousand Fifty Three Dollars and Thirty-Seven Cents (\$84,053.37) in U.S. Currency from JP Morgan Chase Bank Account #XXXXXX0041 titled to Carolyn StarkeyDarden in Trust for Suntosha Starkey;
- Nineteen Thousand Three Hundred Fifty Four Dollars and Nine Cents (\$19,354.09) in U.S. Currency from JP Morgan Chase Bank Account #XXXXXX2213 titled to Carolyn StarkeyDarden and Anthony Darden;
- Twenty Three Thousand Two Hundred Seventy Four Dollars and Thirty-Three Cents (\$23,274.33) in U.S. Currency from JP Morgan Chase Bank Account #XXXXXX3244 titled to Achieving 180, LLC;
- Twenty Thousand Four Hundred Thirty Four Dollars and Ninety-Seven Cents (\$20,434.97) in U.S. Currency from Huntington National Bank Account #XXXXXX9253 titled to Carolyn StarkeyDarden and Anthony Darden;
- Forty Thousand Five Dollars and Seven Cents (\$40,005.07) in U.S. Currency from Huntington National Bank Account #XXXXXX2817 titled to Carolyn StarkeyDarden and Anthony Darden;

- Two Thousand Nine Hundred Ninety Four Dollars and Six Cents (\$2,994.06) in U.S. Currency from Royal Alliance Investment Account #037-385796 titled to Anthony Darden and Carolyn StarkeyDarden;
- Three Hundred Sixty Three Thousand One Hundred Ninety Five Dollars and Thirty Six Cents (\$363,195.36) in U.S. Currency from New England Securities Account #AA2-050505 titled to Carolyn StarkeyDarden;
- Forty Six Thousand Five Hundred Forty Six Dollars and Seventy Four Cents (\$46,546.74) in U.S. Currency from New England Securities Account #4NE-675505 titled to Carolyn StarkeyDarden;
- One Hundred Ninety Thousand Seven Hundred Fifty Two Dollars and Seventy Eight Cents (\$190,752.78) in U.S. Currency from New England Securities Account #AA2-050901 titled to Anthony Darden;
- Sixteen Thousand Eight Hundred Thirteen Dollars and Twenty Five Cents (\$16,813.25) from New England Securities Account #4NE-675513 titled to Anthony Darden;
- Fourteen Thousand Five Hundred Ninety One Dollars and Nine Cents (\$14,591.09) in U.S. Currency representing insurance proceeds received by Samara Starkey from Progressive Insurance related to the

theft/destruction of a 2012 Land Rover Range Rover, VIN:

SALMF1D41CA374336, Bearing Michigan License Plate "Samara."

3. If any of the property described above, 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 party;
 - 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Barbara L. McQuade
United States Attorney

s/ Dawn N. Ison
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Dated: May 23, 2016

orig.

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United States District Court Eastern District of Michigan	Criminal Case Cov
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. Carolyn StarkeyDarden

County where offense occurred : Wayne County

Check One: **Felony** **Misdemeanor** **Petty**

___ Indictment/ Information --- no prior complaint.
 ___ Indictment/ ___ Information --- based upon prior complaint [Case number: _____]
 ___ Indictment/ ___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

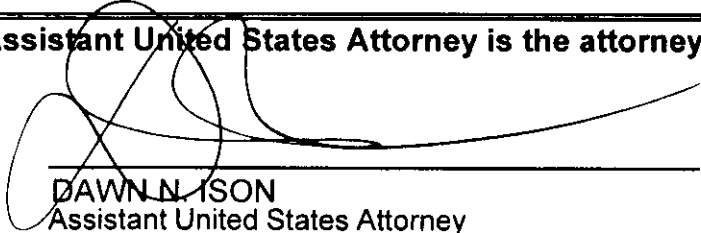
Superseding to Case No: _____ **Judge:** _____

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 23, 2016
Date



 DAWN N. ISON
 Assistant United States Attorney
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 Detroit, MI 48226-3277
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 Attorney Bar #: P43111

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.