

FILED
DEC 21 2018
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

U.S. CLERK OF COURT
EVANSVILLE, INDIANA
UNITED STATES OF AMERICA,)
Plaintiff,)
v.) CAUSE NO. 3:18-cr-^A RLY-MPB
STEPHANIE TENBARGE,)
Defendant.)

INDICTMENT

GENERAL ALLEGATIONS

1. At all times relevant to this Indictment, Echo Housing Corporation (“Echo”) was a non-profit organization based in Evansville, Indiana. Echo’s mission is to create and sustain safe and affordable housing, provide supportive services, and promote community development for homeless men, women, children, and veterans.

2. At all times relevant to this Indictment, STEPHANIE TENBARGE was employed by Echo as Executive Director. In the scope of her employment, TENBARGE had the primary responsibility for bookkeeping, including initiating and posting of transactions into Echo’s books and records by utilizing QuickBooks accounting and payroll software. In addition, TENBARGE balanced bank statements and prepared financial reports and records for Echo’s Board of Directors to approve.

3. At all times relevant to this Indictment, Echo maintained a checking account with Fifth Third Bank, bearing the name “ECHO Housing Corporation,” with an account number ending in 0819.

4. At all times relevant to this Indictment, Echo maintained a checking account with Old

National Bank, bearing the name “ECHO Housing Corporation,” with an account number ending in 3338.

5. At all times relevant to this Indictment, TENBARGE maintained and controlled both Echo checking accounts and had the ability to direct funds from the organization’s accounts to herself and other individuals. TENBARGE also had the ability to sign checks on behalf of Echo for amounts under \$600 which did not require a second signature from a Board member.

6. Between the years 2015 and 2017, Echo used the calendar year as its fiscal year.

7. During each of the fiscal years identified in this Indictment, Echo received more than \$10,000 from a Federal program, including funds from the U.S. Department of Housing and Urban Development, the U.S. Department of Justice, and the U.S. Department of Labor.

SPECIFIC OFFENSES

The general allegations are re-alleged and incorporated by reference in each count as if set forth in full.

COUNT ONE

[Title 18, U.S.C. § 666(a)(1)(A), Theft Concerning Programs Receiving Federal Funds]

The Grand Jury charges that:

Beginning on January 1, 2015 and continuing until December 31, 2015, within the Southern District of Indiana, Evansville Division,

STEPHANIE TENBARGE,

the defendant herein, while acting as an employee agent of Echo Housing Corporation, a non-profit organization located in Vanderburgh County, Indiana, did embezzle, steal, and intentionally misapply, money owned by, or under the care, custody, or control of Echo Housing Corporation, with a value of \$5,000 or more, when Echo 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 during a one year period.

Specifically, from January 1, 2015 through December 31, 2015, TENBARGE embezzled funds entrusted to her as the Executive Director of Echo, in the amount of \$5,000 or more, from the Echo bank accounts, by means of making unauthorized payments to herself.

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

COUNT TWO

[Title 18, U.S.C. § 666(a)(1)(A), Theft Concerning Programs Receiving Federal Funds]

The Grand Jury further charges that:

Beginning on January 1, 2016 and continuing until December 31, 2016, within the Southern District of Indiana, Evansville Division,

STEPHANIE TENBARGE,

the defendant herein, while acting as an employee agent of Echo Housing Corporation, a non-profit organization located in Vanderburgh County, Indiana, did embezzle, steal, and intentionally misapply, money owned by, or under the care, custody, or control of Echo Housing Corporation, with a value of \$5,000 or more, when Echo 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 during a one year period.

Specifically, from January 1, 2016 through December 31, 2016, TENBARGE embezzled funds entrusted to her as the Executive Director of Echo in the amount of \$5,000 or more, from the Echo bank accounts, by means of making unauthorized payments to herself and using Echo funds to pay for personal goods and services.

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

COUNT THREE

**[Title 18, U.S.C. § 666(a)(1)(A),
Theft Concerning Programs Receiving Federal Funds]**

The Grand Jury further charges that:

Beginning on January 1, 2017 and continuing until December 31, 2017, within the Southern District of Indiana, Evansville Division,

STEPHANIE TENBARGE,

the defendant herein, while acting as an employee agent of Echo Housing Corporation, a non-profit organization located in Vanderburgh County, Indiana, did embezzle, steal, and intentionally misapply, money owned by, or under the care, custody, or control of Echo Housing Corporation, with a value of \$5,000 or more, when Echo 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 during a one year period.

Specifically, from January 1, 2017 through December 31, 2017, TENBARGE embezzled funds entrusted to her as the Executive Director of Echo in the amount of \$5,000 or more, from the Echo bank accounts, by means of making unauthorized payments to herself, using Echo funds to pay for personal services and personal property taxes, and issuing unauthorized payroll checks to herself.

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

FORFEITURE

1. Pursuant to Federal Rule of Criminal Procedure 32.2, the United States hereby notifies the defendant that it will seek forfeiture of property, criminally and/or civilly, pursuant to Title 18, United States Code, Sections 982(a)(1)(3)(A), and 981(a)(1)(D), as part of any sentence imposed.

2. Pursuant to Title 18, United States Code, Section 982(a)(1)(3)(A), if convicted of the offenses set forth in Counts one through three of this Indictment, the defendant shall forfeit to the United States:

- a. any property, real or personal, which represents or is traceable to the gross receipts obtained, directly or indirectly, as a result of such violation; or
- b. a sum of money equal to the total amount of the proceeds of the offenses.

3. The United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), if any of the property described above in paragraph 2, as a result of any act or omission of the defendant:

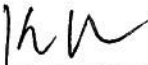
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL:


FOREPERSON

JOSH J. MINKLER
United States Attorney

by:



Kyle M. Sawa
Assistant United States Attorney