

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION

FILED

SEP 07 2016

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 16-20059
)	
ROY COLLINS,)	Title 18, United States Code,
)	Sections 1341, 1343
Defendant.)	
)	

INDICTMENT

COUNT ONE
(Mail Fraud)

THE GRAND JURY CHARGES:

1. From about 2012 and continuing through about 2016, in Kankakee County, in the Central District of Illinois and elsewhere, the defendant,

ROY COLLINS,

knowingly devised a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises.

Background

2. At all times material to this indictment, the defendant resided in Kankakee County, Illinois.

3. Between 2011 and 2016, the defendant was employed as the Executive Director of the Kankakee Valley Park District ("KVPD"). The KVPD is a governmental entity that serves residents of Aroma Park and Kankakee Townships in Illinois.

4. The defendant also served as the treasurer for the Kankakee Valley Park Foundation (“KVPF”) Board. The KVPF is a nonprofit organization exempt from income tax under Section 501(c)(3) of the Internal Revenue Code.

5. In 2013, the KVPD, aided in large part by the defendant, created and held a special event called “BBQ Fest.” The KVPD held this event in 2013 and 2014. In 2015, the KVPF held the event.

The Scheme to Defraud

6. As part of the scheme, the defendant (a) utilized KVPD equipment and labor to build a pond on his personal property, paid for at least in part through KVPD funds; (b) solicited at least one independent contractor to perform work for the KVPD and to perform work on the defendant’s personal residence and suggested the contractor falsely bill all of the work to the KVPD; (c) issued a KVPF check for \$3,008 to Sky Group to purchase a tarp or pond liner for use on his personal property; (d) issued a KVPF check for \$1,400 to a trucking company hired to haul water to a pond on his personal property; and (e) utilized other KVPF and KVPD resources to facilitate the creation and maintenance of a pond on his personal property.

7. As further part of the scheme, the defendant caused a Dixie Chopper mower belonging to the KVPD to be kept and used at his personal property. The defendant also kept and used a KVPD golf cart at his personal property.

8. As further part of the scheme, between about 2013 and about 2015, the defendant converted KVPD and KVPF funds intended for annual BBQ Fest events to his own personal use. The defendant’s scheme to convert these funds included but was not limited to: (a) his demand for and receipt of approximately \$6,000 in kickback payments from an individual hired in connection with the 2014 and 2015 BBQ Fests; (b) his request that the individual who made

kickback payments to him falsely represent the purpose of those payments to law enforcement; and (c) his false representations that certain cash withdrawals he controlled were used to pay BBQ Fest expenses, including but not limited to purported band and vendor payments and purported start-up expenses for the 2014 and 2015 BBQ Fests, when in fact a portion of that cash was converted to his own personal use.

9. As further part of the scheme, between about 2012 and 2014, the defendant caused false representations to be made to the KVPD Board regarding KVPD credit card expenses. The defendant also utilized his KVPD card to make unauthorized personal purchases. For example, the defendant used his KVPD credit card to purchase a pair of boots from the store Boot Country in Nashville, Tennessee, for approximately \$234.87 in June 2013.

10. As further part of the scheme, between 2015 and 2016, the defendant created and provided false documents in order to conceal his theft from the KVPF.

Execution of the Scheme

11. On or about November 11, 2015, in Kankakee County, in the Central District of Illinois and elsewhere, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, the defendant,

ROY COLLINS,

knowingly caused to be delivered by a private and commercial interstate carrier at a location in Kankakee, Illinois, directed by the defendant the following matter: a tarp, that was to be used as a pond liner at the defendant's personal property.

All in violation of Title 18, United States Code, Section 1341.

COUNT TWO
(Wire Fraud)

THE GRAND JURY CHARGES:

1. Paragraphs 1 through 10 of Count 1 are re-alleged and incorporated in Count 2.

Execution of the Scheme

2. On or about June 7, 2013, in Kankakee County, in the Central District of Illinois and elsewhere, the defendant,

ROY COLLINS,

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication, a credit card purchase, in interstate commerce a \$234.87 purchase from Boot Country in Nashville, Tennessee.

All in violation of Title 18, United States Code, Section 1343.

A TRUE BILL.

s/Foreperson

FOREPERSON

s/John Childress

JAMES A. LEWIS
United States Attorney

KVB