

FILED

MAR 17 2026

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

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

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
KYLE SHAY, and)
MEGAN CARROLL,)
)
Defendants.)

Case No. 26-CR-200 110

Title 18, United States Code,
Section 666(a)(1)(A).

INDICTMENT

THE GRAND JURY CHARGES:

Paris Union School District 95

1. At all times material to the indictment, KYLE SHAY, MEGAN CARROLL, and Jeremy Larson were employees and agents of Paris Union School District 95 ("PUSD"). PUSD is a political subdivision within the State of Illinois.

2. PUSD served the Paris, Illinois area and was led by Superintendent Jeremy Larson ("Larson") in 2020 through 2023. In 2020 and continuing into 2023, MEGAN CARROLL was the principal of the Carolyn Wenz Elementary School in PUSD and reported to Larson. In 2020 and continuing into 2023, KYLE SHAY was the principal of Mayo Middle School in PUSD and reported to Larson.

3. Beginning in early 2020, the COVID-19 pandemic impacted the United States, including Paris, Illinois. Employees of PUSD continued to provide services to students impacted by the pandemic, including delivering school lunches.

4. PUSD employees were authorized to apply for mileage reimbursement for miles driven on official business, including lunch delivery. PUSD mileage rates were paid in cents per mile driven. In 2020 and 2021, MEGAN CARROLL and KYLE SHAY enriched themselves at PUSD expense by obtaining round-dollar figure checks for “mileage” reimbursement in amounts greater than miles actually driven on official business.

5. MEGAN CARROLL and KYLE SHAY each obtained money from PUSD with the help of Larson for work in excess of what each had actually completed in programs funded by federal dollars.

6. During the period of March 18, 2021, through March 17, 2022, PUSD received money from grants, including ones funded with federal money. The federally funded program grants included, among others, Title I - Low Income, School Breakfast Program, National School Lunch Program, Summer Food Service Program and Child & Adult Care Food Program.

COUNT ONE
(Embezzlement Concerning Federally Funded Program)

7. In a one-year period from March 18, 2021, through March 17, 2022, in Edgar County, in the Central District of Illinois, and elsewhere,

MEGAN CARROLL,

defendant herein, being an agent of Paris Union School District 95, a local government, which received in that one year period benefits in excess of \$10,000 of grants for education and school lunch programs, stole, embezzled, obtained by fraud, without authority knowingly converted to the use of a person not the rightful owner, and intentionally

misapplied property worth at least \$5,000 within that one year period, under the care, custody, and control of Paris Union School District 95, namely, money,

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

COUNT TWO
(Embezzlement Concerning Federally Funded Program)

8. Paragraphs 1 through 6 are incorporated herein.

9. In a one-year period from March 18, 2021. through March 17, 2022, in Edgar County, in the Central District of Illinois, and elsewhere,

KYLE SHAY,

defendant herein, being an agent of Paris Union School District 95, a local government, which received in that one year period benefits in excess of \$10,000 of grants for education and school lunch programs, stole, embezzled, obtained by fraud, without authority knowingly converted to the use of a person not the rightful owner, and intentionally misapplied property worth at least \$5,000 within that one year period, under the care, custody, and control of Paris Union School District 95, namely, money,

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

A TRUE BILL.

Redacted

FOREPERSON

Redacted

GREGORY M. GILMORE
Acting United States Attorney
WJL