

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ORIGINAL

UNITED STATES OF AMERICA,

Plaintiff,

vs.

D-1 TANYA BOWMAN,

Defendant.

Case:2:16-cr-20209
Judge: Hood, Denise Page
MJ: Patti, Anthony P.
Filed: 03-29-2016 At 09:07 AM
INFO USA V TANYA BOWMAN (BG)

VIOLATIONS:
18 U.S.C. § 371 (Conspiracy)
18 U.S.C. § 666 (Bribery)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Detroit Public Schools (“DPS”) was a government agency operating within Wayne County, Michigan, in the Eastern District of Michigan.

2. DPS was a government agency that received in excess of \$10,000.00 under one or more federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of federal assistance in each one-year period for fiscal years 2011 through 2014.

3. Defendant TANYA BOWMAN was an employee and agent of DPS, a government agency, when she was employed as Principal of Osborn Collegiate Academy of Mathematics, Science and Technology (“Osborn MST”) from 2010 through 2014.

4. As Principal, BOWMAN had the primary authority for ordering school supplies for Osborn MST. BOWMAN also had the primary authority for selecting vendors from whom she would order supplies for Osborn MST.

5. As Principal, BOWMAN was responsible for certifying that Osborn MST received the goods listed on a vendor’s invoice, and then submitting, or causing to be submitted, the invoice to DPS for payment to the vendor.

6. Sometime prior to May 2011, BOWMAN chose Norman Shy, doing business as Allstate Sales (“Shy”), as a vendor of school supplies for Osborn MST.

COUNT ONE

(18 U.S.C. §§ 371, 666(a)(1)(B) –
Conspiracy to Commit Program Fraud Bribery)

7. Paragraphs 1 through 6 of the General Allegations are hereby incorporated in this Count.

8. From in or about May 2011 through June 2014, in the Eastern District of Michigan, defendant TANYA BOWMAN and Shy, did knowingly and willfully conspire and agree with each other for BOWMAN, an agent of DPS, to corruptly accept things of value, to wit: kickback payments, intending to be influenced and

rewarded in connection with a series of payments from DPS to Shy's business, which payments were valued at more than \$5,000, in violation of Title 18, United States Code, Section 666(a)(1)(B).

Manner and Means of the Conspiracy

9. The conspiracy was carried out through the following manner and means:

10. BOWMAN promised to and did take official action, including ordering school supplies from Shy, and certifying and submitting, and causing to be certified and submitted, fraudulent invoices to DPS for payment to Shy for goods that were not delivered, in exchange for kickback payments to BOWMAN from Shy.

11. At times, Shy did not deliver any of the goods to Osborn MST that were listed on the fraudulent invoices that BOWMAN certified and submitted, and caused to be certified and submitted, to DPS for payment.

12. At other times, Shy delivered only a portion of the goods specified on an invoice for the purpose of making the transaction appear legitimate.

13. Shy maintained a ledger to keep track of how much money Shy owed BOWMAN in kickback payments as a result of the fraudulently submitted invoices.

14. BOWMAN regularly met and communicated with Shy to discuss how much money Shy owed her, and to request and receive kickback payments in

connection with the fraudulent invoices she submitted, and caused to be submitted, to DPS.

15. BOWMAN corruptly received things of value, i.e., prepaid gift cards, from Shy, which represented a portion of the payments Shy received from DPS as a result of the fraudulent invoices BOWMAN submitted and caused to be submitted.

16. At Shy's direction, BOWMAN provided Shy with written requests for gift cards on school letterhead, which falsely stated that the gift cards were for school purposes, for the purpose of making the illicit payments appear legitimate.

Overt Acts Which Furthered the Conspiracy

17. In order to further the unlawful conspiracy, one or more of the conspirators committed the following acts, among others:

18. Sometime prior to May 2011, BOWMAN selected Shy as a vendor to provide school supplies to Osborn MST.

19. Sometime prior to May 2011, Shy described to BOWMAN how they could fraudulently "encumber" DPS funds by certifying and submitting, and causing to be certified and submitted, to DPS invoices from Shy for goods that were not delivered.

20. Sometime prior to May 2011, Shy further described that he could provide BOWMAN prepaid gift cards which would represent her portion of the

encumbered funds which Shy fraudulently received from DPS for the undelivered goods.

21. Beginning in at least May 2011, in exchange for kickback payments from Shy, BOWMAN agreed to submit and cause to be submitted to DPS fraudulent invoices from Shy for goods that were not delivered to Osborn MST.

22. From at least May 2011 through in and around April 2014, BOWMAN certified and submitted, and caused to be certified and submitted, fraudulent invoices from Shy on behalf of Osborn MST which caused DPS to issue payments to Shy for goods that were never delivered.

23. On the following approximate dates, among others, at Shy's direction, BOWMAN provided Shy with a letter on Osborn MST letterhead requesting a gift card in order to make a kickback payment from Shy appear legitimate:

- a. May 28, 2011
- b. September 2, 2011
- c. September 27, 2011
- d. March 7, 2013
- e. October 1, 2013

24. On approximately June 12, 2014, Shy sent BOWMAN an e-mail updating her on the amount of kickback payments that were owed to her and directed her to provide him a letter dated December 11, 2013 requesting \$1,000 in

gift cards, a letter dated December 23, 2013 requesting \$750 in gift cards, and a letter dated April 22, 2014 requesting \$880 in gift cards, all on behalf of Osborn MST.

25. On the following approximate dates, among others, BOWMAN accepted kickback payments in the form of prepaid gift cards from Shy:

	Approximate Date	Amount of Kickback
a.	May 28, 2011	\$1,000
b.	September 2, 2011	\$1,000
c.	September 27, 2011	\$970
d.	March 8, 2013	\$500
e.	October 1, 2013	\$500
f.	December 11, 2013	\$1,000
g.	December 23, 2013	\$750
h.	April 22, 2014	\$880

26. From at least May 2011 through June 2014, BOWMAN accepted kickback payments from Shy totaling approximately \$12,500.

All in violation of Title 18, United States Code, Sections 371 and 666.

BARBARA L. McQUADE
United States Attorney



J. MICHAEL BUCKLEY
Assistant United States Attorney
Deputy Chief, Public Corruption Unit



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Dated: March 29, 2016

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United States District Court Eastern District of Michigan	Criminal Case Cove
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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.

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

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

Case Title: USA v. D-1 TANYA BOWMAN

County where offense occurred : Wayne

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: _____

- Original case was terminated; no additional charges or defendants.
- 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.

March 29, 2016
Date

Michael Buckley

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (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.

Companion Case Information

Companion Case Number and Judge Unknown; all cases filed simultaneously on March 29, 2016:

U.S. v. Ronald Alexander

U.S. v. Josette Buendia

U.S. v. Beverly Campbell

U.S. v. Nina Graves-Hicks

U.S. v. James Hearn

U.S. v. Gerlma Johnson

U.S. v. Stanley Johnson

U.S. v. Tia'Von Moore-Patton

U.S. v. Willye Pearsall

U.S. v. Norman Shy and Clara Flowers

U.S. v. Ronnie Sims

U.S. v. Clara Smith