

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

2020 FEB 13 PM 3:08
CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DISTRICT

UNITED STATES OF AMERICA

v.

CASE NO. 3:20-cr-31-J-390BT
18 U.S.C. § 641

VIRGINIA JACQUELINE GAY

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning in or about February 2015, and continuing through in or about September 2019, in the Middle District of Florida, and elsewhere, the defendant,

VIRGINIA JACQUELINE GAY

did knowingly and willfully embezzle, steal, purloin, and convert to the defendant's use and the use of another, more than \$1,000 of money and a thing of value of the United States and Social Security Administration, a department and agency of the United States, that is, money, with intent to deprive the United States and Social Security Administration of the use and benefit of the money and thing of value.

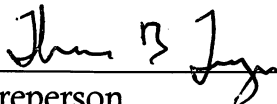
In violation of 18 U.S.C. § 641.

FORFEITURE

1. The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).
2. Upon conviction of a violation of 18 U.S.C. § 641, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
3. The property to be forfeited includes, but is not limited to, the sum of \$99,811.00, which represents the proceeds of the offense.
4. 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;

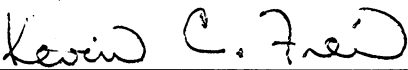
the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,




Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By: 

Kevin C. Frein
Assistant United States Attorney

By: 

Frank M. Talbot
Assistant United States Attorney
Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

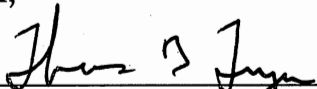
vs.

VIRGINIA JACQUELINE GAY

INDICTMENT

Violations: 18 U.S.C. § 641

A true bill,



Foreperson

Filed in open court this 13th day

of February, 2020.



Clerk

Bail \$ _____
