

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

2020 FEB 13 PM 3:05  
CLERK, US DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DISTRICT

UNITED STATES OF AMERICA

v.

CASE NO. 3:20-cr-33-J-34-JRK  
Ct. 1: 18 U.S.C. § 641

LAUREN MCKAY,  
LEAH MCKAY

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning in or about July 2011, and continuing through in or about June 2017, in Duval County, Florida, in the Middle District of Florida, and elsewhere, the defendants,

LAUREN MCKAY  
and  
LEAH MCKAY,

did knowingly and willfully receive, conceal, and retain more than \$1,000 of money and a thing of value of the United States and the Social Security Administration, a department and agency of the United States, that is, Title II Retirement, Survivors, and Disability Benefits, with the intent to convert the money or thing of value to the defendants' own use or gain, knowing the money and thing of value had been embezzled, stolen, purloined, and converted, from

the United States and the Social Security Administration.

In violation of 18 U.S.C. § 641.

**FORFEITURE**

1. The allegations contained in Count One of this Indictment are incorporated by reference for the purpose of alleging forfeitures 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 defendants shall forfeit to the United States of America, 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 offense.

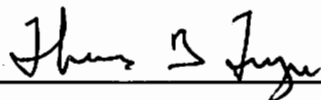
3. The property to be forfeited includes, but is not limited to, at least \$96,055 in proceeds the defendants obtained as a result of the offense.

4. If any of the property described above, as a result of any act or omission of the defendants:


- 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,

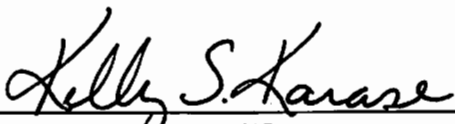
the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:   
\_\_\_\_\_  
David B. Mesrobian  
Assistant United States Attorney

By:   
\_\_\_\_\_  
KELLY KARASE  
Assistant United States Attorney  
Deputy Chief, Jacksonville Division

No.

**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

LAUREN MCKAY,  
LEAH MCKAY

**INDICTMENT**

Violations: Ct. 1: 18 U.S.C. § 641

A true bill,

Therese B. Lopez  
Foreperson

Filed in open court this 13<sup>th</sup> day

of February, 2020

Tracey S. Penotti  
Clerk

Bail \$ \_\_\_\_\_