

FILED

OCT 10 2019

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

SEALED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HILLARY VICTORIA GINN,

Defendant.

Case No. 19 CR 203 JED

FILED UNDER SEAL

INDICTMENT

[COUNTS 1, 3, 5, 7, 9 & 11: 18 U.S.C.

§ 1708 – Theft of Mail and Attempted

Theft of Mail;

COUNTS 2, 4, 6, 8, 10 & 12:

18 U.S.C. § 1705 – Destruction of

Letter Boxes and Mail]

THE GRAND JURY CHARGES:

COUNT ONE  
[18 U.S.C. § 1708]

On or about August 18, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, did steal and take, and attempted to steal and take, from and out of letter boxes, mailboxes, and mail receptacles in the Sheridan Station, that is, a post office facility of the United States Postal Service located at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, letters, mail, and articles and things the defendant abstracted and removed from the stolen letters and mail.

All in violation of Title 18, United States Code, Section 1708.

**COUNT TWO**  
**[18 U.S.C. § 1705]**

On or about August 18, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, willfully and maliciously did injure and break open letter boxes, mailboxes, and other receptacles located in the Sheridan Station, that is, the United States Post Office at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, which were intended and used for the receipt and delivery of mail matter on a mail route of the United States Postal Service.

All in violation of Title 18, United States Code, Section 1705.

**COUNT THREE**  
**[18 U.S.C. § 1708]**

On or about September 7, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, did steal and take, and attempted to steal and take, from and out of letter boxes, mailboxes, and mail receptacles in the Sheridan Station, that is, a post office facility of the United States Postal Service located at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, letters, mail, and articles and things the defendant abstracted and removed from the stolen letters and mail.

All in violation of Title 18, United States Code, Section 1708.

**COUNT FOUR**  
**[18 U.S.C. § 1705]**

On or about September 7, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, willfully and maliciously did injure and break open letter boxes, mailboxes, and other receptacles located in the Sheridan Station, that is, the United States Post Office at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, which were intended and used for the receipt and delivery of mail matter on a mail route of the United States Postal Service.

All in violation of Title 18, United States Code, Section 1705.

**COUNT FIVE**  
**[18 U.S.C. § 1708]**

On or about September 13, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, did steal and take, and attempted to steal and take, from and out of letter boxes, mailboxes, and mail receptacles in the Sheridan Station, that is, a post office facility of the United States Postal Service located at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, letters, mail, and articles and things the defendant abstracted and removed from the stolen letters and mail.

All in violation of Title 18, United States Code, Section 1708.

**COUNT SIX**  
**[18 U.S.C. § 1705]**

On or about September 13, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, willfully and maliciously did injure and break open letter boxes, mailboxes, and other receptacles located in the Sheridan Station, that is, the United States Post Office at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, which were intended and used for the receipt and delivery of mail matter on a mail route of the United States Postal Service.

All in violation of Title 18, United States Code, Section 1705.

**COUNT SEVEN**  
**[18 U.S.C. § 1708]**

On or about September 16, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, did steal and take, and attempted to steal and take, from and out of letter boxes, mailboxes, and mail receptacles in the Sheridan Station, that is, a post office facility of the United States Postal Service located at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, letters, mail, and articles and things the defendant abstracted and removed from the stolen letters and mail.

All in violation of Title 18, United States Code, Section 1708.

**COUNT EIGHT**  
**[18 U.S.C. § 1705]**

On or about September 16, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, willfully and maliciously did injure and break open letter boxes, mailboxes, and other receptacles located in the Sheridan Station, that is, the United States Post Office at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, which were intended and used for the receipt and delivery of mail matter on a mail route of the United States Postal Service.

All in violation of Title 18, United States Code, Section 1705.



**COUNT NINE**  
**[18 U.S.C. § 1708]**

On or about September 22, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, did steal and take, and attempted to steal and take, from and out of letter boxes, mailboxes, and mail receptacles in the Sheridan Station, that is, a post office facility of the United States Postal Service located at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, letters, mail, and articles and things the defendant abstracted and removed from the stolen letters and mail.

All in violation of Title 18, United States Code, Section 1708.

**COUNT TEN**  
**[18 U.S.C. § 1705]**

On or about September 22, 2019, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, willfully and maliciously did injure and break open letter boxes, mailboxes, and other receptacles located in the Sheridan Station, that is, the United States Post Office at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, which were intended and used for the receipt and delivery of mail matter on a mail route of the United States Postal Service.

All in violation of Title 18, United States Code, Section 1705.

**COUNT ELEVEN**  
**[18 U.S.C. § 1708]**

On or about September 22, 2019, at a time later than and distinct from the acts alleged in Counts 9 and 10 of this Indictment, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, did steal and take, and attempted to steal and take, from and out of letter boxes, mailboxes, and mail receptacles in the Sheridan Station, that is, a post office facility of the United States Postal Service located at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, letters, mail, and articles and things the defendant abstracted and removed from the stolen letters and mail.

All in violation of Title 18, United States Code, Section 1708.

**COUNT TWELVE**  
**[18 U.S.C. § 1705]**

On or about September 22, 2019, at a time later than and distinct from the acts alleged in Counts 9 and 10 of this Indictment, in the Northern District of Oklahoma, the defendant, **HILLARY VICTORIA GINN**, willfully and maliciously did injure and break open letter boxes, mailboxes, and other receptacles located in the Sheridan Station, that is, the United States Post Office at 6112 East 51<sup>st</sup> Place South, Tulsa, Oklahoma, which were intended and used for the receipt and delivery of mail matter on a mail route of the United States Postal Service.

All in violation of Title 18, United States Code, Section 1705.

R. TRENT SHORES  
UNITED STATES ATTORNEY

  
JOSEPH F. WILSON  
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson  
Grand Jury Foreperson