IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA GAINESVILLE DIVISION

UNITED STATES OF AMERICA

v. <u>INDICTMENT</u>

MATTHEW G. MUNKSGARD

1:15CRD M

MP/GR

THE GRAND JURY CHARGES:

COUNT ONE

On or about March 8, 2013, in the Northern District of Florida, the defendant,

MATTHEW G. MUNKSGARD,

knowingly made a false statement to Drummond Community Bank (DCB), a federally insured financial institution, for the purpose of influencing the action of DCB in connection with a loan; that is, the defendant submitted to DCB, as security for a line of credit loan in the approximate amount of \$50,922.23, a forged and fraudulently made surveying contract that the defendant falsely claimed he had entered with Cal-Maine Foods.

In violation of Title 18, United States Code, Section 1014.

COUNT TWO

On or about July 17, 2013, in the Northern District of Florida, the defendant,

MATTHEW G. MUNKSGARD,

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knowingly made a false statement to Drummond Community Bank (DCB), a federally insured financial institution, for the purpose of influencing the action of DCB in connection with a loan; that is, the defendant submitted to DCB, as security for a line of credit loan in the approximate amount of \$35,543.40, a forged and fraudulently made surveying contract that the defendant falsely claimed he had entered with Maxwell Co. and Plum Creek.

In violation of Title 18, United States Code, Section 1014.

COUNT THREE

On or about January 6, 2014, in the Northern District of Florida, the defendant,

MATTHEW G. MUNKSGARD,

knowingly made a false statement to Drummond Community Bank (DCB), a federally insured financial institution, for the purpose of influencing the action of DCB in connection with a loan; that is, the defendant submitted to DCB, as security for a line of credit loan in the approximate amount of \$30,961.50, a forged and fraudulently made surveying contract that the defendant falsely claimed he had entered with St. Johns River Water Management.

In violation of Title 18, United States Code, Section 1014.

COUNT FOUR

On or about June 10, 2014, in the Northern District of Florida, the defendant,

MATTHEW G. MUNKSGARD,

knowingly made a false statement to Drummond Community Bank (DCB), a federally insured financial institution, for the purpose of influencing the action of DCB in

connection with a loan; that is, the defendant submitted to DCB, as security for a line of credit loan in the approximate amount of \$60,164.70, a forged and fraudulently made surveying contract that the defendant falsely claimed he had entered with Triple Bell Farms, Ltd.

In violation of Title 18, United States Code, Section 1014.

COUNT FIVE

On or about March 8, 2013, in the Northern District of Florida, the defendant,

MATTHEW G. MUNKSGARD,

did knowingly possess and use, without lawful authority, a means of identification of another person, that is, the name of K.M., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), that is, making a false statement in a loan application, as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 1028A.

CRIMINAL FORFEITURE

The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

From his engagement in the violations alleged in Counts One through Four of this Indictment, the defendant,

MATTHEW G. MUNKSGARD,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A) any and all of the defendant's right, title, and interest in any property, real and

personal, constituting, and derived from proceeds traceable to such offenses.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL:

FOREPERSON

DATE

PAMELA C. MARSH

United States Attorney

HERBERT S. LINDSEY

Assistant United States Attorney

Thristopher P. Canona