

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

UNITED STATES OF AMERICA

V.

**SEALED
INDICTMENT**

HENRY FLERIJEAN

4:16 ✓ 47-MW

THE GRAND JURY CHARGES:

COUNT ONE

Between on or about February 14, 2012, and on or about February 21, 2012,
in the Northern District of Florida and elsewhere, the defendant,

HENRY FLERIJEAN,

knowingly and willfully did receive, conceal, and retain with the intent to convert to his own use and gain, money of the United States, to wit, money of the Internal Revenue Service, an agency of the United States, in an amount greater than \$1,000, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Section 641

COUNT TWO

On or about February 21, 2012, in the Northern District of Florida, the defendant,

CERTIFIED A TRUE COPY
By: Jessica J. Lyublanovits Deputy Clerk

HENRY FLERIJEAN,

knowingly and with the intent to defraud, did possess fifteen or more counterfeit and unauthorized access devices, namely debit cards, and by this offense, did affect interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(3) and 1029(c)(1)(A)(i).

COUNT THREE

Between on or about January 22, 2012, and on or about February 21, 2012, in the Northern District of Florida and elsewhere, the defendant,

HENRY FLERIJEAN,
did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and social security number of B.A., J.D., A.H., P.H., B.N., L.T., and N.T., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, theft of government money as charged in Count One of this Indictment, and possession of fifteen or more counterfeit and unauthorized access devices as charged in Count Two this Indictment.

In violation of Title 18, United States Code, Section 1028A(a)(1).

CRIMINAL FORFEITURE

The allegations contained in Counts One and Two of this Indictment are

hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

From his engagement in the violations alleged in Counts One and Two of this Indictment, the defendant,

HENRY FLERIJEAN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B), and Title 28, United States Code, Section 2461(c), 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; and any personal property used and intended to be used to commit Count Two, pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

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,

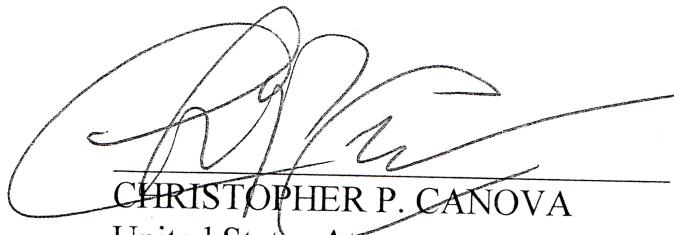
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

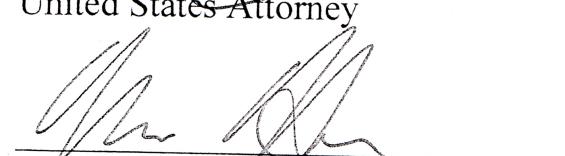
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10-41-2016

DATE



CHRISTOPHER P. CANOVA
United States Attorney



MICHAEL J. HARWIN
Assistant United States Attorney