

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. <u>3:18-559</u>
)	18 USC § 1029(a)(2)
)	18 USC § 2
v.)	18 USC § 982(a)(2)(B)
)	18 USC § 1029(c)(1)(C)
)	28 USC § 2461(c)
LASHONDA RAVENELL)	<u>INDICTMENT</u>

COUNT 1

THE GRAND JURY CHARGES:

That from in or around September of 2016, and continuing through in or around January of 2017, in the District of South Carolina and elsewhere, the Defendant, **LASHONDA RAVENELL**, along with others both known and unknown to the grand jury, knowingly and with intent to defraud did use more than one unauthorized access device, and during such time period and by such conduct did obtain goods and services having an aggregate value in excess of \$1,000.00, and such did affect interstate commerce;

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

FORFEITURE

ACCESS DEVICE FRAUD:

Upon conviction to violate Title 18, United States Code, Section 1029(a)(2) as charged in this Indictment, the Defendant, **LASHONDA RAVENELL** shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), and Title 28, United States Code, Section 2461(c), any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offense, and property, real or personal, which constitutes or is derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violation, and any property traceable to such property.

(1) Proceeds/Money Judgment:

- (a) A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offense charged in this Indictment, that is, a minimum of approximately \$30,786.62 in United States currency, and all interest and proceeds traceable thereto, and/or that such sum equals all property derived from or traceable to her violation of 18 U.S.C. §§ 1029(a)(2) and 2, for which the Defendant is liable;

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant-

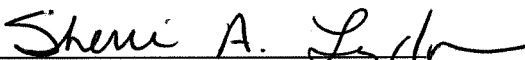
- A. Cannot be located upon the exercise of due diligence;
- B. Has been transferred or sold to, or deposited with, a third person;
- C. Has been placed beyond the jurisdiction of the court;
- D. Has been substantially diminished in value; or
- E. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating 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;

Pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), and Title 28, United States Code, Section 2461(c).

A True BILL


FOREPERSON


SHERRI A. LYDON (JCP)
UNITED STATES ATTORNEY

RECORD OF GRAND JURY BALLOT

C/R 3:18-539

THE UNITED STATES OF AMERICA v. LASHONDA RAVENELL

(SEALED UNTIL FURTHER ORDER OF THE COURT)
