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FILED

APR 25 2019

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BY _____
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SHABINA DEBBIE,

15 Defendant.
16

CASE NO. **2:19 - CR - 0072 JAM**

18 U.S.C. § 1709 – Embezzlement and Theft of Mail
by a Postal Employee (9 Counts); 21 U.S.C. §
841(a)(1) – Possession with Intent to Distribute
Marijuana; 21 U.S.C. § 853(a) – Criminal Forfeiture

17 INDICTMENT

18 COUNTS ONE THROUGH NINE: [18 U.S.C. § 1709 – Embezzlement and Theft of Mail by a Postal
Employee]
19

20 The Grand Jury charges: T H A T

21 SHABINA DEBBIE,

22 defendant herein, on or about the dates listed below, in the County of Sacramento, State and Eastern
23 District of California, being a postal service employee, did embezzle one or more letters and mail, and
24 articles and things contained therein, which were entrusted to her, and which came into her possession
25 intended to be conveyed by mail to Intended Recipients 1–18, and which were carried by a carrier,
26 agent, and other person employed by a department of the Postal Service, and which were forwarded
27 through and delivered from a post office, and did steal, abstract, and remove from such letters and mail
28 one or more articles and things contained therein, as set forth below:

COUNT	DATE	Tracking Number	Original Delivery City, State, and Zip Code
One	10/31/2018	9505 5262 1166 8290 3033 43	Isabela P.R. 00662
		EM079068293US	Niagara Falls, NY 14303
Two	11/17/2018	9505 5133 7574 8321 2281 69	Dorchester, MA 02122
Three	11/19/2018	9505 5133 7575 8323 2147 70	Windsor, CT 06095
		9505 5133 7575 8323 2149 47	Belleville, WV 26133
Four	11/24/2018	9505 5133 7574 8328 2291 45	Minneapolis, MN 55415
		9505 5133 7574 8328 2295 41	Lakeville, MA 02347
		9505 5133 7574 8328 2295 58	Tampa, FL 33607
Five	12/1/2018	9505 5133 7574 8335 2329 09	Crimora, VA 24431
		9505 5133 7574 8335 2330 05	Harrisburg, PA 17109
Six	12/8/2018	9505 5133 7574 8342 2350 85	New Port Richey, FL 34654
		9505 5133 7574 8342 2352 07	Richmond, VA 23221
Seven	12/29/2018	9505 5133 7575 8363 2268 25	Bagdad, KY 40003
Eight	1/3/2019	9505 5133 7573 9003 1522 30	Belton, SC 29267
Nine	2/9/2019	9505 5133 7572 9039 1401 58	Fort Lauderdale, FL 33311
		9505 8133 7574 9040 2602 19	Weslaco, TX 78599
		9505 5067 1081 9040 0299 46	Milwaukee, WI 53223
		9505 5133 7574 9040 2602 70	Blacksburg, SC 29702

All in violation of Title 18, United States Code, Section 1709.

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1 COUNT TEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Marijuana]

2 The Grand Jury further charges: T H A T

3 SHABINA DEBBIE,

4 defendant herein, on or about February 14, 2019, in the County of Sacramento, State and Eastern
5 District of California, and elsewhere, did knowingly and intentionally possess with intent to distribute
6 Marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section and
7 841(a)(1).

8 FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) – Criminal Forfeiture]

9
10 1. Upon conviction of the offense alleged in Count Ten of this Indictment, defendant
11 SHABINA DEBBIE shall forfeit to the United States pursuant to Title 21, United States Code, Section
12 853(a), the following property:

13 a. All right, title, and interest in any and all property involved in violation of Title
14 21, United States Code, Section 841(a)(1), for which the defendant is convicted, and all property
15 traceable to such property, including the following: all real or personal property, which constitutes or is
16 derived from proceeds obtained, directly or indirectly, as a result of such offense; and all property used,
17 or intended to be used, in any manner or part to commit or to facilitate the commission of the offense.

18 b. A sum of money equal to the total amount of proceeds obtained as a result of the
19 offense, for which defendant is convicted.

20 2. If any property subject to forfeiture, as a result of the offense alleged in Count Ten of this
21 Indictment, for which defendant is convicted:

22 a. cannot be located upon the exercise of due diligence;

23 b. has been transferred or sold to, or deposited with, a third party;

24 c. has been placed beyond the jurisdiction of the Court;

25 d. has been substantially diminished in value; or

26 e. has been commingled with other property which cannot be divided without
27 difficulty;

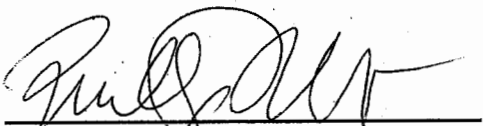
28 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek

1 forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

2 A TRUE BILL.

3
4 **/s/ Signature on file w/AUSA**

5
6 FOREPERSON

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8 MCGREGOR, W. SCOTT
9 United States Attorney

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2:19 - CR - 0072 JAM

United States v. Shabina Debbie
Penalties for Indictment

COUNTS 1-9: 18 U.S.C. § 1709 – Theft of Mail by Postal Employee

Up to 5 years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of not more than 3 years

\$100 Special Assessment (mandatory on each count)

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 10: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Marijuana

Up to 5 years in prison; or
Fine of up to \$250,000, or both fine and imprisonment;
Supervised release of at least 2 years up to life.

\$100 Special Assessment (mandatory on each count)

FORFEITURE ALLEGATION:

VIOLATION: 21 U.S.C. § 853(a) – Criminal Forfeiture

PENALTIES: As stated in the charging document

No. 2:19 - CR - 0072 JAM

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

SHABINA DEBBIE

INDICTMENT

VIOLATION(S): 18 U.S.C. § 1709 – Embezzlement of Mail by Postal Employee (9 Counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Marijuana;
21 U.S.C. § 853(a) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 25 day

of April, A.D. 20 19

Clerk

Bail, \$

NO PROCESS NECESSARY