

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

2019 OCT 10 PM 1:16  
CLERK U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DISTRICT

UNITED STATES OF AMERICA

v.

CASE NO. 3:19-cr-174-J-32POB  
18 U.S.C. § 1542  
18 U.S.C. § 1028A  
18 U.S.C. § 1621

BRANDI NICOLE FLETCHER

a/k/a a name with the initials K.P.

a/k/a a name with the initials A.I.N.D.

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about February 8, 2019, in the Middle District of Florida, and  
elsewhere, the defendant,

BRANDI NICOLE FLETCHER,  
a/k/a a name with the initials K.P.,  
a/k/a a name with the initials A.I.N.D.,

did willfully and knowingly make a false statement in an application for a  
passport that she submitted to the United States Post Office at the Jacksonville  
General Mailing Facility, which was a passport acceptance facility for the  
United States Department of State, with the intent to induce and secure the  
issuance of a passport under the authority of the United States for her own  
use, contrary to the laws regulating the issuance of passports and the rules

prescribed pursuant to such laws, by completing the passport application with false and fraudulent information, that is, the false name of someone with the initials A.I.N.D., knowing that this representation was false, and by presenting fraudulent documents in support of the application, that is, a fraudulently obtained Florida identification card in the name of someone with the initials A.I.N.D.

In violation of 18 U.S.C. § 1542.

**COUNT TWO**

On or about February 8, 2019, in the Middle District of Florida, and elsewhere, the defendant,

BRANDI NICOLE FLETCHER,  
a/k/a a name with the initials K.N.P.,  
a/k/a a name with the initials A.I.N.D.,

did knowingly possess and use, without lawful authority, a means of identification of another person, specifically, the name, date of birth, and social security number of someone with the initials A.I.N.D., and a fraudulently obtained Florida identification card in the name of someone with the initials A.I.N.D., during and in relation to a felony violation of false statement in an application for a passport, in violation of 18 U.S.C. § 1542, as charged in Count One of this Indictment, knowing that such means of identification belonged to an actual person.

In violation of 18 U.S.C. § 1028A(a)(1).

**COUNT THREE**

On or about July 12, 2019, in the Middle District of Florida, and elsewhere, the defendant,

BRANDI NICOLE FLETCHER,  
a/k/a a name with the initials K.P.,  
a/k/a a name with the initials A.I.N.D.,

having taken an oath before a competent person, that is, Joel B. Toomey, a United States Magistrate Judge for the Jacksonville Division of the United States District Court for the Middle District of Florida, in a case in which a law of the United States authorizes an oath be administered, that she would testify truly, did willfully and contrary to such oath state material matters which she did not believe to be true, specifically, that her name was a name with the initials K.P., that her date of birth was a date in October of 1998, and in response to the question “And do you have any kind of criminal record at all?” responding “No.”

In violation of 18 U.S.C. § 1621.

**FORFEITURE**

1. The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(6).

2. Upon conviction of a violation of 18 U.S.C. § 1542, the defendant, BRANDI NICOLE FLETCHER, a/k/a a name with the initials K.P., a/k/a a name with the initials A.I.N.D. shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6):

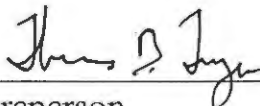
- a. Any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense;
- b. Any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and
- c. Any property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense.

3. If any of the property described above, 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 party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

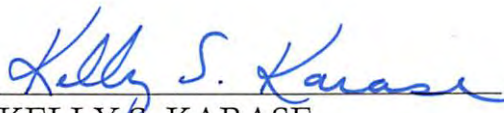
- e. has been commingled with other property which cannot be divided without difficulty, the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:   
\_\_\_\_\_  
LAURA COFER TAYLOR  
Assistant United States Attorney

By:   
\_\_\_\_\_  
KELLY S. KARASE  
Assistant United States Attorney  
Deputy Chief, Jacksonville Division

No.

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**UNITED STATES DISTRICT COURT**

Middle District of Florida

Jacksonville Division

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THE UNITED STATES OF AMERICA

vs.

BRANDI NICOLE FLETCHER

a/k/a a name with the initials K.P.

a/k/a a name with the initials A.I.N.D.

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**INDICTMENT**

Violations:

Count One: 18 U.S.C. § 1542

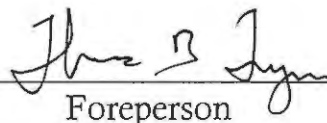
Count Two: 18 U.S.C. § 1028A(a)(1)

Count Three: 18 U.S.C. § 1621

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A true bill,

  
Foreperson

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Filed in open court this 10<sup>th</sup> day

of October, 2019.

  
Clerk

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Bail \$ \_\_\_\_\_

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