

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

2017 MAY 10 PM 4:57

CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DISTRICT

UNITED STATES OF AMERICA

v.

CASE NO. 3:17-cr-85-J-39203
18 U.S.C. § 1589

GUARINO BROCCOLI
a/k/a GARY BROCCOLI
a/k/a GARY EDWARDS

INDICTMENT

The Grand Jury charges:

COUNT ONE

From in or about May of 2016 through in or about August 2016, in the
Middle District of Florida and elsewhere, the defendant,

GUARINO BROCCOLI,
a/k/a GARY BROCCOLI,
a/k/a GARY EDWARDS,

did knowingly provide and obtain the labor and services of a female whose
initials are M.O. by means of force and threats of force to M.O., threats of serious
harm to M.O., and by means of a scheme, plan, and pattern intended to cause
M.O. to believe that, if M.O. did not perform such labor and services, that M.O.
would suffer serious harm, which offense included aggravated sexual abuse.

All in violation of 18 U.S.C. § 1589(a).

FORFEITURE

1. The allegations contained in Count One of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 1594.

2. Upon conviction of a violation of 18 U.S.C. § 1589, the defendant, GUARINO EDWARD BROCCOLI, a/k/a GARY BROCCOLI, a/k/a GARY EDWARDS, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 1594, (1) any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense.

3. The property to be forfeited includes, but is not limited to, the following:

- a. Real property located at 439 SW Tara Court, Fort White, Columbia County, Florida 32038, including all manufactured homes, improvements thereon and appurtenances thereto.

4. 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,

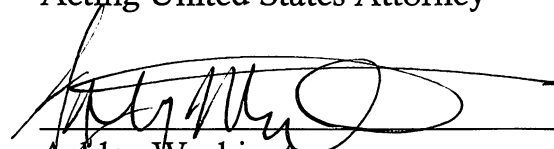
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson

W. STEPHEN MULDROW
Acting United States Attorney

By:


Ashley Washington
Assistant United States Attorney

By:


Frank Talbot
Assistant United States Attorney
Acting Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

GUARINO BROCCOLI,
a/k/a GARY BROCCOLI,
a/k/a GARY EDWARDS,

INDICTMENT

Violations: 18 U.S.C. § 1589

A true bill,

Michelle E. Smith
Foreperson

Filed in open court this 10th day

of May, 2017.

Inese S. Penotti
Clerk

Bail \$ _____
