

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 3:17-cr-85(S1)-J-39PDB
18 U.S.C. § 1589
18 U.S.C. § 641

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

FILED
6/14/17
CLERK, U. S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

SUPERSEDING 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).

COUNT TWO

Beginning in or about April 2012, and continuing through in or about November 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 and willfully embezzle, steal, purloin, and convert to the defendant's use and the use of another, more than \$1,000 of money and a thing of value of the United States and Social Security Administration, a department and agency of the United States, that is, Child Auxiliary benefits for Minor Child 1 with intent to deprive the United States and the Social Security Administration of the use and benefit of the money and thing of value.

In violation of 18 U.S.C. § 641.

COUNT THREE

Beginning in or about September 2016, and continuing through in or about November 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 and willfully embezzle, steal, purloin, and convert to the defendant's use and the use of another, more than \$1,000 of money and a thing of value of the

United States and Social Security Administration, a department and agency of the United States, that is, Child Auxiliary benefits for Minor Child 2 with intent to deprive the United States and the Social Security Administration of the use and benefit of the money and thing of value.

In violation of 18 U.S.C. § 641.

COUNT FOUR

Beginning in or about January 1994, and continuing through in or about June 2017, in the Middle District of Florida, and elsewhere, the defendant,

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

did knowingly and willfully embezzle, steal, purloin, and convert to the defendant's use and the use of another, more than \$1,000 of money and a thing of value of the United States and Social Security Administration, a department and agency of the United States, that is, Disability Benefits with intent to deprive the United States and Social Security Administration of the use and benefit of the money and thing of value.

In violation of 18 U.S.C. § 641.

FORFEITURE

1. The allegations contained in Counts One through Four of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 1594, 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c).

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. Upon conviction of a violation of 18 U.S.C. §§ 641, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

4. 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, more particularly described as:

Lot 6 of SUNVIEW ESTATES ADDITION, a subdivision according to the Plat thereof as recorded in Plat Book 7, Page(s) 107, of the Public Records of Columbia County, Florida;

Together with a 1997 GENE doublewide mobile home with Identification Numbers GMHGA4469614197A and GMHGA4469614197B, the titles which have been retired with the Florida Department of Motor Vehicles pursuant to Section 319.261, Florida Statutes, and hereafter considered a part of the above described property.

Subject, however, to all covenants, conditions, restrictions, reservations, limitations, easements and to all applicable zoning ordinances and/or restrictions and prohibitions imposed by government authorities, if any.

TOGETHER with all the tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining.

PARCEL: 33-5S-16-03745-306; and

- b. a \$284,278.00 forfeiture money judgment, which represents the proceeds of the offense charged in Counts Two, Three and Four.

5. 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

FORM OBD-34
6/13/17 Revised

No.

UNITED STATES DISTRICT COURT

Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

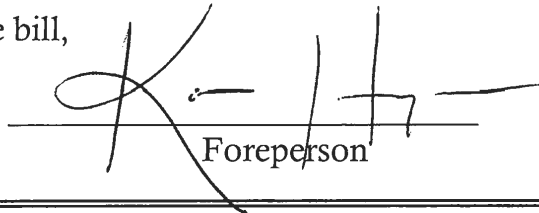
vs.

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

INDICTMENT

Violations: 18 U.S.C. § 1589
18 U.S.C. § 641

A true bill,



Foreperson

Filed in open court this 14th day

of June, 2017.



Deputy Clerk

Bail \$ _____
