

**FILED**

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

2017 JUL 25 PM 4: 28

CLERK, US DISTRICT COURT  
MIDDLE DISTRICT FLORIDA  
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:17-cr-368-TJSS

ASHLEY STANBACK

18 U.S.C. § 641

INDICTMENT

**SEALED**

The Grand Jury charges:

COUNTS ONE THROUGH FIVE  
**(THEFT OF GOVERNMENT PROPERTY)**

Beginning in or about October 2012 and continuing through in or about August 2013, and specifically on or about the dates of deposit set forth below, in the Middle District of Florida and elsewhere, the defendant,

**ASHLEY STANBACK,**

did knowingly and willfully embezzle, steal, purloin and convert to the defendant's use, and the use of others, more than \$1,000 of money and a thing of value of the United States and the United States Treasury, a department and agency of the United States, that is, federal income tax refunds issued in the name of the listed third party taxpayer, with intent to deprive the United States and the United States Treasury of the use and benefit of the money and thing of value:

<b>Count</b>	<b>Date of Deposit</b>	<b>Initials of Third Party Taxpayer</b>	<b>Refund Amount</b>
<b>One</b>	10/25/2012	M.S.	\$7,159.00
<b>Two</b>	10/25/2012	A.C.	\$7,159.00
<b>Three</b>	11/01/2012	P.C.	\$7,159.00
<b>Four</b>	11/01/2012	A.O.	\$7,159.00
<b>Five</b>	05/16/2013	G.D. and L.D.	\$9,676.00

All in violation of 18 U.S.C. §§ 641 and 2.

**FORFEITURE**

1. The allegations contained in Counts One through Five are incorporated by reference for the purpose of alleging forfeiture pursuant to 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. § 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.

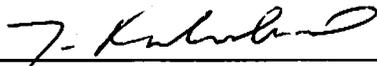
3. The property to be forfeited includes, but is not limited to, a forfeiture money judgment of at least \$38,312, which represents the proceeds of the offenses charged in Counts One through Five.

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;

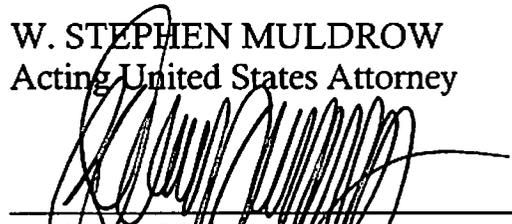
the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

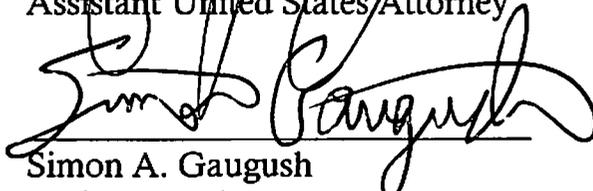
  
\_\_\_\_\_  
Foreperson

W. STEPHEN MULDROW  
Acting United States Attorney

By:

  
\_\_\_\_\_  
Kelley C. Howard-Khen  
Assistant United States Attorney

By:

  
\_\_\_\_\_  
Simon A. Gaugush  
Assistant United States Attorney  
Chief, Economic Crimes Section

No.

**FILED**

---

---

**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Tampa Division

**2017 JUL 25 PM 4:28**

**CLERK, US DISTRICT COURT  
MIDDLE DISTRICT FLORIDA  
TAMPA, FLORIDA**

---

---

THE UNITED STATES OF AMERICA

vs.

ASHLEY STANBACK

---

---

**INDICTMENT**

Violations: 18 U.S.C. § 641

---

---

A true bill,



Foreperson

---

---

Filed in open court this 25th day

of July 2017.

\_\_\_\_\_  
Clerk

---

---

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