

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PANAMA CITY DIVISION**

UNITED STATES OF AMERICA

v.

CASE NO.: 5:18cr3-RH

VICKI D. MIDDLEMAS
_____ /

STATEMENT OF FACTS FOR GUILTY PLEA

The Defendant admits if this case were to proceed to trial, the government could prove the following beyond a reasonable doubt.

Between approximately March, 2010, and May, 2015, the Defendant, Vicki Middlemas (“Middlemas”), was the Executive Director of the Visual Arts Center (“VAC”), a purported non-profit organization that was a major part of Panama City’s downtown revitalization efforts. The VAC operated under an agreement with the City of Panama City (“the City”) that allowed the VAC to operate in a City owned building located at 19 E. 4th Street, Panama City, FL, and provided the VAC with approximately \$89,964 per year, of City funds, to assist with operating costs. The agreement between the City and the VAC specifically noted that the VAC was a non-profit entity with a 501(c) designation, and that the City funds were not to be used for management or personnel salaries. This was signed annually between the City and the VAC (Middlemas as signatory).

FILED IN OPEN COURT THIS

August 2, 2018

**CLERK, U.S. DISTRICT
COURT, NORTH. DIST. FLA.**

Between 2012 and 2014, the VAC building underwent renovations that were funded by the City. Almost all of the renovations were completed by Anderson Construction, a company operating in Panama City, which directly billed the VAC for its services. In April 2015, the City learned that the VAC was no longer a 501(c)(3) tax exempt entity and had lost its status in 2012. Consequently, a financial audit was performed on the VAC by the City.

Count Ten, Count Twelve, and Count Fourteen:

During the audit, it was learned that Middlemas had submitted fraudulent and altered invoices, purportedly from Anderson Construction, to the City. When the City received the fraudulent invoices from Middlemas, the City paid the VAC. Middlemas used her Knology email account to transmit these false invoices to the City Budget Director.

A criminal investigation was initiated by the IRS Emerald Coast Financial Crimes Task Force. The investigation revealed that as a result of Middlemas' fraudulent invoice scheme, the City overpaid the VAC \$22,595.69 (the difference between what Anderson Construction actually billed and received for its services and what Middlemas submitted to the City via the fictitious invoices). Middlemas deposited this money into her personal bank account and made notations that the money was part of her salary, which in fact was not true. The fraudulent invoices

created by Middlemas were also found in her office at the VAC during a search warrant executed on June 23, 2015.

Summary of Invoices						
Anderson Invoice Number	Anderson Invoice Amount*	Date MIDDLEMAS Emailed Invoice to the City	Invoice Amount Emailed By MIDDLEMAS	Amount Paid by the City	City Check Number	
1	\$16,830.00	12/12/2013	\$16,830.00	\$16,830.00	380514**	
2 (False Invoice)	\$71,486.00	04/09/2014	\$64,656.00	\$64,656.00	383696	
3	\$52,640.00	05/27/2014	\$52,640.00	\$52,640.00	385187***	
4	\$29,356.00	06/20/2014	\$29,356.00	\$29,356.00	386134	
4R	\$10,356.00	-	-	-	-	
5 (False Invoice)	\$13,011.00	07/29/2014	\$36,910.00	\$36,910.00	387613	
5R	\$356.00	-	\$356.00	-	-	
4313-CO4R	\$4,545.31	-	-	-	-	
4313-CO4R	-	-	-	-	-	
	Total*		\$200,748.00	\$200,392.00		

*Note: The total contract amount was \$177,796. Each Anderson Construction Invoice included completed billable work plus any unpaid amounts from prior billings.
**Note: This check was in the amount of \$38,880, which included the requested \$16,830 plus an unrelated \$22,050 payment
***Note: This check was in the amount of \$53,433.12, which included the requested \$52,640 plus and unrelated \$793.12 payment

On 12/12/13, Middlemas sent invoice #1 from Anderson Construction (\$16,830.00) to Brandy Waldron, Budget Director for Panama City. It is unknown how Middlemas delivered this invoice, and consequently this act was not charged as a substantive wire count, but is still part of the charged scheme.

The City issued a check (#380514) for \$38,880.00 on 12/20/13, which included the \$16,830.00 and an unrelated invoice for \$22,050.00, which was deposited by Middlemas into the VAC bank account. Middlemas paid Anderson Construction \$10,000 on 03/21/14, leaving a balance of \$6,830.00.

Count 10: On 04/09/14, Middlemas sent invoice #2 (which was an altered invoice for \$64,656) via e-mail to Brandy Waldron. The actual invoice from Anderson Construction was for \$71,486.00. The City issued a check to the VAC for

\$64,656.00 on 04/18/14. Middlemas paid Anderson Construction \$68,600.00 on 04/22/14, leaving a balance of \$2886.00. Middlemas submitted this altered invoice reflecting a figure that was lower than the original invoice in order to conceal the fact that she had only made a partial payment on the previous invoice. Invoice 1 was \$16,830, but she only paid Anderson \$10,000. So, the next Anderson invoice reflected that \$6,830 was still owing. Middlemas subtracted \$6,830 from the \$71,486 invoice, and altered the invoice to reflect that only \$64,656 was owed. Between 12/19/13 and 03/21/14, Middlemas issued herself checks totaling \$24,494.00.

On or about 5/27/14, Middlemas, via email, sent an invoice (Invoice 3) for \$52,640.00 to the Budget Director for the City. Middlemas used her VAC Knology account to send the email. The invoice Middlemas emailed was the accurate amount billed by Anderson Construction. In response to the email sent by Middlemas on or about 5/30/14, the City issued a check to the VAC for approximately \$53,433.12. Middlemas then deposited this check into the VAC bank account at Regions Bank.

On or about 5/2/14, Middlemas paid Anderson Construction approximately \$52,640.00, leaving a balance of \$2866.00 owed to Anderson Construction.

Count 12: On 06/20/14, Middlemas sent invoice #4 (\$29,356.00) via e-mail to Brandy Waldron. The City issued a check for \$29,356.00 on 06/27/14 which Middlemas deposited into the VAC bank account. Middlemas issued Anderson

Construction a cashier's check for \$19,000.00 as a partial payment on 07/15/14. Anderson Construction sent invoice "4R" for the remaining balance of \$10,356 which was never sent to the City. Between 06/27/14 and 08/07/14, Middlemas issued herself checks totaling \$11,034.34.

Count 14: On 07/29/14, Middlemas sent invoice #5 (an altered invoice for \$36,910.00) via e-mail to Brandy Waldron. The actual invoice from Anderson Construction was for \$13,011.00. The City issued a check to VAC for \$36,910.00 on 08/08/14. Middlemas paid Anderson Construction \$23,109.00 on 08/11/14. Middlemas then issued a cashier's check to Anderson Construction on 11/13/14 for \$2,000.00. Then she issued another VAC check on 12/17/14, for \$2,545.31 to Anderson Construction. Between 08/08/14 and 12/17/14, Middlemas issued herself checks totaling \$28,440.80. This altered invoice (#5) was found on Middlemas' computer that was seized during the search warrant at the VAC. A paper copy of this falsified invoice was also found in Middlemas' office at the VAC. The Panama City Police Department secured separate search warrants to search the VAC and Middlemas' computer. During the search of the VAC, officers located a folder in Middlemas' office labeled "Anderson Construction," which contained the accurate Anderson Construction invoices. The computer was in fact infected with

ransomware, and law enforcement was only able to acquire a few documents from the computer.

The total amount of monies paid to the VAC based on invoices presented by Vicki Middlemas, for Anderson Construction, mostly via email to the City Budget Director, Brandy Waldron, total \$200,392.00. Monies paid to Anderson Construction by Vicki Middlemas total \$177,796.31, for a difference of \$22,595.69. Anderson Construction stated that it has been paid in full (\$177,796.31). The sole signer on the VAC bank accounts was Middlemas.

Summary of Payments							
Anderson Invoice Number	Date of City Payment to VAC	Amount Paid by the City	City Check Number	Cumulative Payments by the City	Date of VAC Payments to Anderson	Payments by VAC to Anderson*	Cumulative Payments to Anderson
1	12/20/2013	\$16,830.00	380514**	\$16,830.00	03/21/2014	\$10,000.00	\$10,000.00
2 (False Invoice)	04/18/2014	\$64,656.00	383696	\$81,486.00	04/22/2014	\$68,600.00	\$78,600.00
3	05/30/2014	\$52,640.00	385187***	\$134,126.00	06/02/2014	\$52,640.00	\$131,240.00
4	06/27/2014	\$29,356.00	386134	\$163,482.00	07/15/2014	\$19,000.00	\$150,240.00
4R	-	-	-	-	08/11/2014	\$10,356.00	\$160,596.00
5 (False Invoice)	08/08/2014	\$36,910.00	387613	\$200,392.00	08/11/2014	\$12,655.00	\$173,251.00
5R	-	-	-	-	-	\$0.00	\$173,251.00
4313-CO4R	-	-	-	-	11/13/2014	\$2,000.00	\$175,251.00
4313-CO4R	-	-	-	-	12/17/2014	\$2,545.31	\$177,796.31
		\$200,392.00				\$177,796.31	
						Amount Paid by the City	\$200,392.00
						Less: Amount Paid to Anderson	<u>\$177,796.31</u>
						Overpayment	\$22,595.69

*Note: The total contract amount was \$177,796. Each Anderson Construction invoice included completed billable work plus any unpaid amounts from prior billings.
 **Note: This check was in the amount of \$38,880, which included the requested \$16,830 plus an unrelated \$22,050 payment
 ***Note: This check was in the amount of \$53,433.12, which included the requested \$52,640 plus and unrelated \$793.12 payment

During the search, investigators located and seized the 2014 financial records for the VAC. The VAC's bank statements showed four charges of a house being rented at Alys Beach, Florida.

On March 26, 2014, Middlemas paid a total of \$4,807.63 (two charges \$2,403.82 and \$2,403.81) on a Regions Bank debit card on the VAC account to rent Unit 25MC (25 Moongate Court) for three nights (March 26-28). Regions Bank records show the payments were made using the VAC debit card and cleared on March 26, 2014, and March 28, 2014, respectively.

On September 12, 2014, Middlemas paid a total of \$2,477.32 (two charges of \$1,238.66) on a Regions Bank debit card on the VAC account to rent Unit 25MC for two nights (September 12-13). Regions Bank records show the payments were made using the VAC debit card and both charges cleared on September 15, 2014.

According to the VAC financial statement, which was created by Middlemas, Middlemas recorded the March 26, 2014, Alys Beach rental charges under the account "Exhibits/Events: Fundraising costs," with memos that state "paint class" and "paint class fundraiser."

The records show that Middlemas recorded the September 12, 2014, Alys Beach rental under the account "Exhibits/Events: Preview Party Costs." The charges

at Alys Beach were not a legitimate use of VAC funds, and Middlemas used the rental at Alys Beach for her personal use. No VAC events were held there.

On October 23, 2017, SA Wendy Kay Kilpatrick interviewed Kimberly Burkhalter Townsley, Vice President in Regions Bank's Legal Department. Townsley explained how debit card transactions were processed for Regions Bank customers and whether or not the financial transaction crossed state lines. According to Townsley, Regions Bank debit card transactions cross multiple state lines. When a debit card is used, the transaction first goes to the processing center for the company where the card was used. Then once the transaction clears the company's processing center, every transaction for Regions Bank then clears through the Regions Bank operations center in Birmingham, Alabama. In this case, the debit card transactions occurred at Alys Beach in Florida and were transmitted via wire to the Regions Bank operations center in Birmingham, Alabama, on June 23, 2015. The Regions Bank debit card used by Middlemas belonged to the VAC.

A review of grand jury records and analysis by SA Chris Pekerol indicated the following personal expenditures made by Defendant Middlemas:

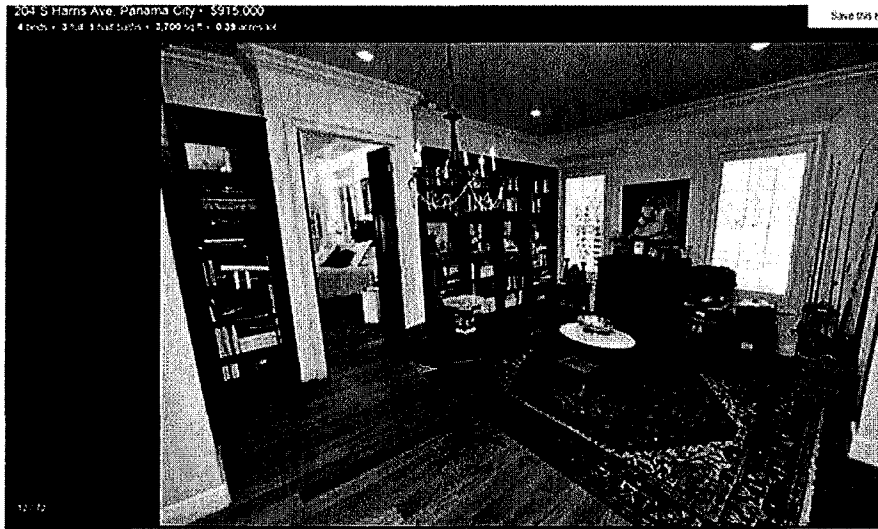
- a) On or about March 2, 2012, Middlemas wrote a \$300 check payable to artist Dale Estka for a custom painting of her daughter; the check was drawn on the VAC Regions Bank account ending in 6538;
- b) On or about March 22, 2012, Middlemas made a \$2,586.33 purchase at Louis Vuitton for a Rossmore PM bag and an Eva Monogram bag, using the VAC Regions Bank debit card for account ending in 7282;
- c) On or about April 11, 2012, Middlemas made a \$382.37 purchase at Nordstrom for the purchase of two Bond No.9 Scent of Peace perfumes, using the Regions Bank debit card for account ending in 7282;
- d) On or about April 30, 2012, Middlemas made two \$1,081.50 purchases at Southwest Airlines for air travel tickets to Las Vegas, NV, for Middlemas and her husband, William Carter Middlemas;
- e) On or about May 21, 2012, Middlemas made a \$459.43 purchase at a Dolce Gabbana retail store in Las Vegas, NV, using the VAC Regions Bank debit card for account ending in 7282;
- f) On or about August 8, 2012, Middlemas made a \$379.16 purchase at Walt Disney World, which was a down payment on annual park passes for Middlemas and each of her three daughters, using the VAC Regions Bank debit card for account ending in 7282;

- g) On or about October 15, 2012, Middlemas made a \$429.18 purchase at Dream Gowns in Panama City, FL, for the purchase of a dress for her daughter Carleigh Middlemas, using the VAC Regions Bank debit card for account ending in 7282;
- h) On or about November 12, 2012, Middlemas made a \$2,005.25 purchase at Louis Vuitton for a Cosmetic Pouch Monogram Vernis, a Artsey MM Damier Azur Bag, and a Damier Azur Organizer De Poche Card Holder, using the VAC Regions Bank debit card for account ending in 7282;
- i) On or about December 19, 2012, Middlemas made a \$5,404.42 purchase at Horchow for a 10x14 Meadow Oushak rug, using the VAC Regions Bank debit card for account ending in 6538. The Defendant contends that this rug was placed at the VAC;
- j) On or about February 5, 2013, Middlemas made a \$563.65 purchase at Burberry for a Short Technical Taffeta Peplum Trench Coat, using the VAC Debit Card for account ending in 6538;
- k) On or about November 4, 2013, Middlemas made two purchases at The Real Real in the amounts of \$914.99 and \$729.99, for multiple women's designer clothing items and a Louis Vuitton Nice bag, using the VAC Regions Bank debit card for account ending in 6538;

- l) On or about November 4, 2013, Middlemas made a \$573.75 purchase at Ballard Designs for a 3.6x5.6 Sheridan Wool Rug and other items, using the VAC Regions Bank debit card for account ending in 6538. The Defendant contends that this rug was placed at the VAC;
- m) On or about March 26, 2014, and March 28, 2014, Middlemas made purchases in the amounts of \$2,403.82 and \$2,403.81 respectively, at Alys Beach for the rental of a vacation home, using the VAC Regions Bank debit card for account ending in 6538;
- n) On or about September 15, 2014, Middlemas made purchases in the amounts of \$1,238.66 and \$1,238.66, at Alys Beach for the rental of a vacation home, using the VAC Regions Bank debit card for account ending in 6538;
- o) On or about September 27, 2014, Middlemas used the VAC debit card to make several purchases in the total amount of \$314.87 for Flash tattoos from Bombora Sun and Surf located in Rosemary Beach, Florida.
- p) On or about December 15, 2014, Middlemas made a \$4,789.95 purchase at Wayfair.com, for a red/gold Serapi Tribal Area Rug and a red/navy Serapi Tribal Area Rug, using the VAC Regions Bank debit card for account ending in 6538 (see below);

q) **(Count 1)** Between January 2012 through December 2014, Middlemas made approximately twenty-seven payments from the VAC Regions Bank account ending in 6538 to Verizon wireless totaling approximately \$11,052.35, to pay for her entire family's cellular phone bills. This included, on April 16, 2013, paying approximately \$336.99 for a personal Verizon bill using the VAC debit card.

SA Perkerol discovered the rugs purchased from Wayfair were the same rugs in the Defendant's home as the home was for sale and listed on Realtor.com. SA Pekarol observed two rugs in Middlemas' home (see images below) that appeared to be the red/gold Serapi Tribal Area Rug and the red/navy Serapi Tribal Area Rug Middlemas purchased from Wayfair on or about December 15, 2014, using a VAC Regions Bank debit card. SA Pekarol compared the images of the rugs in Middlemas' home to images of the red/gold Serapi Tribal Area Rug and the red/navy Serapi Tribal Area Rug listed on Wayfair.com and confirmed that the rugs were indeed the same.



On March 27, 2018, IRS executed a search warrant at the residence. The rugs were recovered. In addition, IRS seized 4 Luis Vuitton hand-bags, and an additional Luis Vuitton bag was later recovered. IRS also seized a Dolce Gabana I-Pad cover

box. The boxes from the Nordstrom perfumes were also seized. A number of documents from the VAC were also seized.

Count 24:

The tax investigation revealed that the Forms 1040 and 1040X Middlemas filed for the years 2012 through 2015, grossly underreported the income Middlemas earned and embezzled from the VAC. The specific items method of proof was used to determine Middlemas' unreported income. Middlemas failed to report the personal expenditures she made from the VAC's bank accounts, salary and bonus payments she paid herself via checks from the VAC. A majority of these checks noted "salary" or "bonus" in the memo line. Some of the checks noted business related expenses and reimbursements. These payments were potentially non-taxable and therefore were subtracted during the calculation of Middlemas' unreported income (i.e. the Government's calculations to determine tax deficiency accorded the Defendant every benefit). Middlemas used the filing status Married Filing Jointly for the years 2012 through 2015, so that filing status was used in the determination of her criminal tax deficiency.

Middlemas' 2012 and 2013 Forms 1040 were prepared by Francis Plitman (Plitman) of H & R Block. Plitman prepared Middlemas' 2012 and 2013 Forms 1040 based solely on the information and records she was provided. Plitman did not

remember preparing the Returns, but confirmed her signature and told agents that she always reviewed returns with her clients before they were filed. One of the Returns filed with the IRS is marked "Copy Only Do Not File" but is signed by Middlemas, William Middlemas (husband), and Plitman. Handwritten at the top of the return is "Process As Original Faxed Return." Plitman could not explain to agents why a copy of this Return was filed rather than the original. The records Plitman used to prepare the Returns were not attached to the Returns. After preparing the Returns, Plitman went over it with her clients to ensure everything was correct. Middlemas and her husband were responsible for signing and mailing the completed returns to the IRS.

Middlemas' 2012 Form 1040X and 2014 Form 1040 were prepared by US Tax Shield. The tax returns were prepared based solely on information and records provided by William and Middlemas. After preparing the Returns, US Tax Shield emailed copies to William and Middlemas for their review. William Middlemas and Middlemas then printed out the Returns, signed them, and mailed them back to US Tax Shield. US Tax Shield made copies of the completed returns and filed them with the IRS via certified mail.

Middlemas' Form 2015 was prepared by her husband William Middlemas ("William"). Middlemas' tax returns for years 2012 through 2015 were filed jointly

with her husband. The investigation revealed that while William was primarily responsible for preparing and filing the tax returns, he did so based on figures provided to him by Middlemas. According to William, Middlemas did not provide him with W-2s or 1099s. Instead, she would write the amounts on a piece of paper. William said he wrote down whatever Middlemas had told him.

The returns Middlemas filed for years 2012 through 2015 were used in computing Middlemas' reported income and unreported income amounts.

The following evidence shows that Middlemas made and subscribed returns that were materially false:

- a) The 2012 Form 1040X Middlemas filed was signed by Middlemas on January 19, 2016. On her Return, Middlemas reported Total Income of \$128,028. This figure did not include \$18,301 that Middlemas paid herself from the VAC bank account or the \$8,531 in personal expenditures she made from the VAC's bank accounts.
- b) The 2013 Form 1040 Middlemas filed was signed by Middlemas on September 12, 2014. On her Return, Middlemas reported Total Income of \$113,817. This figure did not include \$7,498 that Middlemas paid herself from the VAC bank account or the \$4,347 in personal expenditures she made from the VAC's bank accounts.

c) **Count Twenty-Four**- The 2014 Form 1040 Middlemas filed was signed by Middlemas on December 29, 2016. On this Return, Middlemas reported Total Income of \$107,142. This figure did not include \$38,831 that Middlemas paid herself from the VAC bank account or the \$10,050 in personal expenditures she made from the VAC's bank accounts.

d) The 2015 Form 1040 Middlemas filed was electronically signed by Middlemas on October 18, 2016. On this Return, Middlemas reported Total Income of \$113,317. This figure did not include \$27,660 that Middlemas paid herself from the VAC bank account that year.

The returns, statements, and other documents contained a written declaration that it was made under the penalties of perjury: The Forms 1040 and 1040X that Middlemas filed for the years 2012, 2013, and 2014, were physically signed under penalties of perjury. The Form 1040 that Middlemas filed for the year 2015 contained Middlemas' electronic signature made under penalties of perjury.

The following evidence shows that Middlemas knew that her returns were not true and correct as to every material matter:

a) Middlemas completed and signed the checks she received from the VAC and deposited them into her personal bank accounts. The majority of these checks noted

“bonus” or “salary” in the memo line, indicating that Middlemas knew that the payments were income, yet still failed to report it on her federal income tax returns.

b) In addition to the salary and bonuses Middlemas was paid by the VAC, she was also provided a \$500 per month allowance for fuel and vehicle maintenance. Even though the VAC paid her vehicle expenses, Middlemas deducted the use of her vehicle on the Schedules C she filed with her 2012 and 2013 tax returns. Throughout the time period under investigation, Middlemas used VAC funds to pay for her entire family’s Verizon cellular phone bills, which included phone lines for Middlemas, her husband, and three children. Even though Middlemas’ phone bills were paid with VAC funds, Middlemas still deducted phone expenses on the Schedules C she filed with her 2012 and 2013 tax returns. (Note: The vehicle allowance and improper deductions were not included in the criminal tax computation.)

The following facts also demonstrate Middlemas’ voluntary and intentional (willful) violation of her known legal duty to assess and pay U.S. income tax:

a) Much of Middlemas’ unreported income stemmed from her fraudulent schemes. As noted, Middlemas embezzled funds from the VAC and created false invoices, which she transmitted to the City requesting inflated payments. Middlemas also procured art that was donated to the VAC, and which she then sold to an auction house in Atlanta for approximately \$19,000. The proceeds of the sale

were wire transferred by the auction house to the VAC's bank account. Middlemas transferred the proceeds of the inflated invoice scheme and the procured art to her personal bank accounts via checks made payable to herself that noted "salary" or "bonus" in the memo line.

- b) Middlemas failed to prepare and provide Forms W-2 and/or Forms 1099 to report wages and other payments made to the VAC's employees, including herself.
- c) Middlemas made personal expenditures from the VAC corporate bank accounts, including designer handbags and family vacations. These expenditures were not reported by Middlemas as income on her Federal Income Tax Returns.
- d) Middlemas filed a false Form 990 for the year 2013 that failed to report Middlemas as an officer and her income from the VAC, as required by law. Middlemas failed to file Forms 990 for the years 2014 or 2015.

On or about November 16, 2017, Middlemas and her husband paid approximately \$63107 to the IRS, which was the amount owing on the false returns. This payment was for personal income taxes for the years 2012, 2013, 2014, 2015. It appears that when they filed their federal income tax returns for those years they didn't pay the taxes due, so their account went into collection accruing additional interest and penalties. The November 16, 2017, payment was for the taxes that were reported on their income tax returns for those years. The investigation revealed that

they failed to report income of \$140,397 during those years, resulting in a criminal tax due and owing as follows:

2012: \$10,775

2013: \$4,357

2014: \$17,166

2015: \$10,981

Total: \$43,279

NOTICE OF ELEMENTS

Count 1: Wire Fraud, 18 U.S.C. § 1343

Jury Instruction- Pattern Instruction 051

To prove a violation of 18 U.S.C. § 1343, the government must prove all of the following elements beyond a reasonable doubt:

First: the defendant knowingly devised or participated in a scheme to defraud, or to obtain money or property by using false pretenses, representation, or promises;;

Second: the false pretenses, representations, or promises were about a material fact,

Third: the Defendant acted with the intent to defraud; and

Fourth: the Defendant transmitted or caused to be transmitted by wire some communication in interstate commerce to help carry out the scheme.

Count 2: Filing a False Related Tax Document (26 U.S.C. § 7206(1))

Jury Instruction- Pattern Instruction 0109.1

To prove a violation of 26 U.S.C. § 7206(1), the government must prove all of the following elements beyond a reasonable doubt:

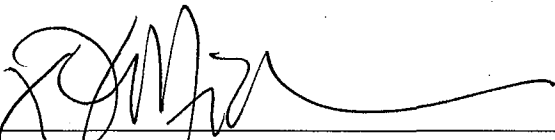
First: The defendant made or caused to be made the tax document in question for the year charged;

Second: the tax document contained a written declaration that it was made under the penalty of perjury;

Third: when the Defendant made or helped make the tax document, she knew it contained false material information;

Fourth: when the Defendant did so, she intended to do something she knew violated the law; and


Fifth: the false matter in the tax document related to a material statement.



VICKI MIDDLEMAS
Defendant

8/2/18

Date




TIM JANSEN
Attorney for Defendant

8/2/18

Date

CHRISTOPHER P. CANOVA
United States Attorney



AINE AHMED
Assistant United States Attorney
GA Bar No.: 005699
30 West Government Street
Panama City, FL 32401
(850)785-3495

8/2/18

Date