# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA GAINESVILLE DIVISION

UNITED STATES OF AMERICA

SEALED INDICTMENT

1:18cr26-MW

WILLIAM LARRY JOHNS

v.

THE GRAND JURY CHARGES:

#### **COUNT ONE**

Between on or about January 20, 2004, and on or about September 1, 2017, in the Northern District of Florida, the defendant,

## WILLIAM LARRY JOHNS,

knowingly and willfully did receive, conceal, and retain, with the intent to convert to his own use and gain, money of the United States, of a value of more than \$1,000, to wit: money of the United States Department of Veterans Affairs, an agency of the United States, in the approximate amount of \$196,297.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Section 641.

#### **CRIMINAL FORFEITURE**

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

From his engagement in the violation alleged in Count One of this Indictment, the defendant,

### WILLIAM LARRY JOHNS,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the defendant's right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offense.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL:

12/4/2018

DATE

CHRISTOPHER P. CANOYA

United States Attorney

JUSTIN M. KÆEN

Assistant United States Attorney