

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

**UNITED STATES OF AMERICA**

**CASE No: 1:19cr1/MW**

**v.**

**CARON E. GRIFFIS**  
\_\_\_\_\_ /

**FACTUAL BASIS FOR GUILTY PLEA**

Defendant admits that, if this case were to proceed to trial, the Government could prove the following facts beyond a reasonable doubt:

Caron E. Griffis (hereinafter "Defendant") had been employed by the VAMC in Gainesville in her current position since January 8, 2017. Defendant's primary responsibility was purchasing any needed and authorized supplies from outside vendors for the Gainesville VAMC. Due to this responsibility, Defendant was required to have United States Government General Services Administration (GSA) purchase cards issued by the VA in her name, and was also responsible for completing internal purchase orders and reconciliation documents for each transaction that would be charged to her VA purchase card(s).

From April 2018 to July 2018, Defendant had a large amount of work absences, such as approved sick leave for health concerns of her own as well as to "care for a relative with a serious condition" via the Family Medical Leave Act

(FMLA). Even though Defendant was primarily absent in May and June, purchases were still being made on Defendant's purchase cards and Defendant's VA purchase orders and reconciliation documents justifying the expenditures were accumulating.

While reviewing Defendant's purchase orders and reconciliation documents, the approving official for Defendant's supply purchases noticed several in-store purchases were made with one of Defendant's purchase cards at two local Office Depot retail stores in Gainesville, FL. These purchases were considered to be abnormal due to most Office Depot purchases were generally not done in person. Contact was made with Office Depot customer service and additional information concerning these transactions was requested.

Office Depot's Public Sector Account Manager in Gainesville, FL provided the requested information regarding five in-store purchases with Defendant's purchase card ending in 3586 which totaled \$6,260.47. These five transactions included 31 MasterCard Gift Cards, among other things. Video and still-shot surveillance footage for the Office Depot transactions on May 4, 2018 and May 17, 2018 were provided to the VA. The person on surveillance seen completing the purchases were Defendant. A further review of Defendant's timesheet summary statements indicated that she had worked regular scheduled days at the Gainesville VAMC on May 4, 2018 and on May 17, 2018, and the surveillance footage provided by Office Depot placed Defendant in the stores on those days during her regular

work hours (8:00 a.m. – 4:30 p.m.). The items purchased were unauthorized, and the VA reported the transactions to be fraudulent.

Defendant's annual VA training was current and she was formerly trained in the policies, procedures, and ethics required for all VA purchase card holders. Records of those trainings were provided to SA Fernandes as part of his investigation. The most applicable training courses of Defendant included Compliance and Business Integrity Awareness Mandatory Education (completed annually and most recently on May 2, 2018), Unauthorized Commitments (completed annually and most recently on May 2, 2018), GSA SmartPay Purchase Card Training for Cardholders (completed annually and most recently on February 22, 2018), VA Online Purchase Card Training (completed annually and most recently on September 13, 2017), and VA Online Travel Card Training (completed annually and most recently on June 6, 2017).

After discovering the fraudulent purchases from Office Depot, the VA conducted a further review of historical purchases on Defendant's purchase cards. Upon initial review, they noticed several online purchases from Walmart.com; many of which were already reported by Defendant to be fraudulent on her reconciliation documents. The transactions from Walmart.com included several unauthorized purchases (gift cards, video game accessories, Apple iPhones, and cell phone accessories) that were placed online in 2017 (starting on June 10, 2017) and in 2018.



The items were primarily shipped to 329 SE 34th Street, Keystone Heights, FL, in Defendant's name (this address was the residence of Defendant's parents).

The five most recent Walmart.com transactions were compared to Defendant's timesheet summaries. One purchase on May 7, 2018, one purchase on May 8, 2018, two purchases on May 30, 2018, and one purchase on July 10, 2018 were all made while Defendant was of record as being on a variation of leave (annual leave, sick leave, and LWOP) from the VA.

On July 17, 2018, RAC Lindquist and SA Fernandes interviewed Defendant at her residence concerning this investigation. After being advised of her Garrity Rights as a VA employee, Defendant:

- Admitted to using her VA purchase cards for several months to purchase items she knew to be unapproved and unauthorized.
- Stated that although she made some in-person transactions, she primarily ordered the items online and had the items shipped to her parents' residence located at 329 SE 34th Street, Keystone Heights, FL.
- Further stated after obtaining the items she would then sell the items for cash and then use the funds to illegally purchase oxycodone pills from a local drug dealer near her residence.

- Admitted after she made the fraudulent purchases, she would then create false reconciliation forms in the computer system at work to attempt to justify the transactions and avoid complications.

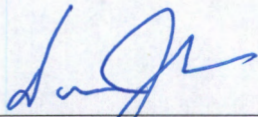
The total amount of unauthorized purchases made by Defendant on these accounts was calculated to be \$36,026.66. Due to the claim of fraud from the VA on Defendant's VISA purchase card account ending in 3586, Office Depot issued credits to VA's account, causing Office Depot to suffer a financial loss in the amount of \$6,260.47. Due to the false claim of fraud from Defendant's reconciliation documents regarding her VISA purchase card account, Walmart issued a credit of \$3,310.08 to VA's account, which caused Walmart to suffer a financial loss in that amount. The VA's net loss after credits by Office Depot and Walmart is \$26,456.11.

### ELEMENTS OF THE OFFENSE

***Count One—11<sup>th</sup> Circuit Court of Appeals Pattern Jury Instructions § 021— Theft of Public Money, Property, or Records***

Elements to be proven beyond a reasonable doubt:

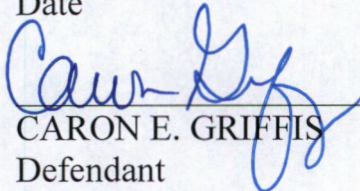
- (1) the money or property described in the indictment belonged to the United States;
- (2) the Defendant [embezzled] [stole] [knowingly converted] the money or property to his/her own use or to someone else's use;
- (3) the Defendant knowingly and willfully intended to deprive the United States of the use or benefit of the money or property; and
- (4) the money or property had a value greater than \$1,000.



DARREN JOHNSON  
Attorney for Defendant

June 5, 2019

Date



CARON E. GRIFFIS  
Defendant

June 5, 2019

Date

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06/05/2019

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