IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

UNITED STATES OF AMERICA

v. **INFORMATION**

Case No.: 4:16cr42-RH

LYDIA JENNINE THOMAS

_____/

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

Between on or about January 4, 2012, and on or about March 9, 2014, in the Northern District of Florida, the defendant,

LYDIA JENNINE THOMAS,

knowingly and willfully did steal and convert to her use and the use of another, and without authority did convey and dispose of money of the United States of a value of more than $1,000, to wit, United States tax refunds totaling approximately $125,189.00.

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

COUNT TWO

On or about February 11, 2014, in the Northern District of Florida, the defendant,

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LYDIA JENNINE THOMAS,

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and social security number of R.M.R., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), that is, theft of government money, as charged in Count One of this Information.

In violation of Title 18, United States Code, Section 1028A(a)(1).

CRIMINAL FORFEITURE

The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

From her engagement in the violation alleged in Count One of this Information, the defendant,

LYDIA JENNINE THOMAS,

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 said defendant up to the value of the forfeitable property.

CHRISTOPHER P. CANOVA
United States Attorney

COREY J. SMITH
Assistant United States Attorney

9/7/2016
DATE