

District of Alabama, the defendant,

ROXANNE SAUNDERS GILLILAND

knowingly executed or attempted to execute a scheme and artifice to obtain moneys, funds, credits, assets, securities and other property owned by and under the custody and control of Merrill Lynch, a financial institution the deposits of which were then insured by the Federal Deposit Insurance Corporation (“FDIC”), by means of false and fraudulent pretenses, representations, and promises which did not belong to her. All in violation of Title 18, United States Code, Section 1344.

COUNT THREE [18 U.S.C. § 1344]

The United States Attorney charges that:

1. From on or about April 12, 2006, in Etowah County, within the Northern District of Alabama, the defendant,

ROXANNE SAUNDERS GILLILAND

knowingly executed or attempted to execute a scheme and artifice to obtain moneys, funds, credits, assets, securities and other property owned by and under the custody and control of Merrill Lynch, a financial institution the deposits of which were then insured by the Federal Deposit Insurance Corporation (“FDIC”), by means of false and fraudulent pretenses, representations, and promises which

did not belong to her. All in violation of Title 18, United States Code, Section 1344.

COUNT FOUR [18 U.S.C. § 1344]

The United States Attorney charges that:

1. From on or about August 8, 2006, in Etowah County, within the Northern District of Alabama, the defendant,

ROXANNE SAUNDERS GILLILAND

knowingly executed or attempted to execute a scheme and artifice to obtain moneys, funds, credits, assets, securities and other property owned by and under the custody and control of Merrill Lynch, a financial institution the deposits of which were then insured by the Federal Deposit Insurance Corporation (“FDIC”), by means of false and fraudulent pretenses, representations, and promises which did not belong to her. All in violation of Title 18, United States Code, Section 1344.

COUNT FIVE: (18 U.S.C. § 981 (a)(1)(C) and 28 U.S.C. § 2461(c)).

The United States Attorney charges that:

1. The allegations of Count One of this Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 18,

U.S.C. Section 981(a)(1)(C) and 28 U.S.C. Section 2461(c).

2. Pursuant to Rule 32.2(a) Fed. R. Crim. P., the defendant is hereby notified that pursuant to Title 18, United States Code, Section 982(a) and (a)(3)(B), the defendants,

ROXANNE SAUNDERS GILLILAND

upon conviction of the offense set forth in this Information, shall forfeit to the United States any property, real or personal, that constitutes or is derived from, directly or indirectly, gross proceeds traceable to the commission of the said violations including but not limited to the following:

JUDGMENT FOR PROCEEDS

A sum of money equal to \$577,796.31, in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged.

3. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

All in accordance with Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

JOYCE WHITE VANCE
United States Attorney



PATRICK CARNEY
Assistant United States Attorney