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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI EASTERN DIVISION

UNITED STATES OF AMERICA	UNITED	STATES OF	AMERICA
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CRIMINAL NO. 2:14cr56145-MTP

JERRY WOODLAND (Wherever Found)

The Clerk of said Court will issue a warrant, an indictment against the above-named defendant having been filed in the above-entitled cause on the _____ day of November, 2014.

This the _____ day November, 2014.

GREGORY K. DAVIS United States Attorney

By:

D. MICHAEL HURST,

Assistant United States Attorney

MS Bar # 99990

Warrant issued:

DMH

PATTICES OF THE UNITED STATES DISTRICT COURT EASTERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:14CT 56 145-MTP

JERRY WOODLAND

18 U.S.C. § 371

The United States Attorney charges:

At all times relevant to this Information:

- 1. Forrest County, Mississippi, is a local government and a political subdivision of the State of Mississippi located within the Southern District of Mississippi.
- 2. The Forrest County Sheriff's Office ("FCSO") is an agency of Forrest County, Mississippi, with the FCSO's duties and responsibilities including, among other things, the investigation of crimes committed in Forrest County and the operation and management of the Forrest County Detention Center.
- 3. The Forrest County Detention Center received benefits in excess of \$10,000 in Federal assistance in a one year period during each year of the conspiracy listed below.
- 4. Defendant **JERRY WOODLAND** was a kitchen employee at the Forrest County Detention Center, and as such, was an agent of Forrest County, Mississippi, as that term is defined in Section 666(d), Title 18, United States Code.
- From in or about 2002 through in or about 2014, in Forrest County in the Eastern
 Division of the Southern District of Mississippi, and elsewhere, the defendant, JERRY
 WOODLAND, did knowingly and intentionally combine, conspire, confederate, and agree with

persons known and unknown to the United States Attorney, to commit one or more of the following offenses:

- a. Theft concerning programs receiving Federal funds, in violation of Section 666(a)(1)(A), Title 18, United States Code.
- b. Mail fraud, in violation of Section 1341, Title 18, United States Code.
- 6. It was part of the conspiracy that defendant **JERRY WOODLAND**, and others known and unknown to the United States Attorney, would order food or food-related items, or would cause such food or food-related items to be ordered, for the Forrest County Detention Center.
- 7. It was further part of the conspiracy that defendant **JERRY WOODLAND**, and others known and unknown to the United States Attorney, would conceal the true identity of what the Forrest County Detention Center was ordering by fraudulently listing or causing others to fraudulently list other items on the Forrest County purchase requisition forms.
- 8. It was further part of the conspiracy that defendant JERRY WOODLAND, and others known and unknown to the United States Attorney, would embezzle, steal, obtain by fraud, knowingly convert or intentionally misapply food or food-related items by transporting or having such food or food-related items transported directly from the Forrest County Detention Center and delivered to the personal residences of WOODLAND or others, or to businesses or entities owned or controlled by or affiliated with WOODLAND or others, for their own personal benefit and use.

In furtherance of the conspiracy and to carry out its objectives, the following overt acts were committed:

- 9. Between 2002 through 2014, defendant **WOODLAND** and others known and unknown to the United States Attorney ordered food and food-related items, or caused such food or food-related items to be ordered, purportedly for the use and benefit of the Forrest County Detention Center but in reality such food and food-related items were for the personal use and benefit of **WOODLAND** and others.
- 10. Between 2002 through 2014, defendant **WOODLAND** and others known and unknown to the United States Attorney embezzled, stole, obtained by fraud, knowingly converted or intentionally misapplied such food and food-related items, including items not served at the jail such as ribs, steak, shrimp, clam strips, and beef brisket, to themselves or others, as well as to businesses or entities owned or controlled by or affiliated with **WOODLAND** or others.
- 11. Between 2002 through 2014, defendant **WOODLAND** and others fraudulently transported from the Forrest County Detention Center food and food-related items purchased by the Forrest County Detention Center to the personal residences of **WOODLAND** or others, or to businesses or entities owned or controlled by or affiliated with **WOODLAND** or others, for their own personal benefit and use.
- 12. Between 2009 through 2014, defendant **WOODLAND** and others known and unknown to the United States Attorney drafted and submitted various Forrest County purchase requisition forms, or caused such forms to be drafted and submitted, some of which contained fraudulent entries concealing the true identity of food and food-related items purchased by the

Forrest County Detention Center, with the intent that such food and food-related items would be embezzled, stolen, converted, fraudulently obtained or intentionally misapplied by defendant

WOODLAND or others, and such items being purchased by invoices and payments sent through the United States Postal Service or other common carrier.

All in violation of Section 371, Title 18, United States Code.

GREGORY K. DAVIS United States Attorney Case 2:14-cr-00056-KS-MTP Document 1-1 Filed 11/24/14 Page 1 of 1

SOUTHERN DISTRICT OF MISSISSIPP

U.S. District Court PLACE OF OFFENSE: 2:14cr 520 KS-MTP RELATED CASE INFORMATION: SUPERSEDING INDICTMENT _____ DOCKET # CITY: PURVIS SAME DEFENDANT ___ NEW DEFENDANT MAGISTRATE JUDGE CASE NUMBER __ COUNTY: FORREST R 20/R 40 FROM DISTRICT OF _ **DEFENDANT INFORMATION:** JUVENILE: YES X NO MATTER TO BE SEALED: YES X NO NAME/ALIAS: JERRY WOODLAND **U.S. ATTORNEY INFORMATION:** AUSA <u>DMH</u> BAR # <u>99990</u> INTERPRETER: X NO YES LIST LANGUAGE AND/OR DIALECT: LOCATION STATUS: ARREST DATE _____ ALREADY IN FEDERAL CUSTODY AS OF _____ ALREADY IN STATE CUSTODY ON PRETRIAL RELEASE **U.S.C. CITATIONS** TOTAL # OF COUNTS: ______ PETTY ____ **MISDEMEANOR** DESCRIPTION OF OFFENSE CHARGED COUNT(S) (CLERK'S OFFICE USE ONLY) INDEX KEY/CODE CONSPIRACY 18: USC § 371 18:922.F Set 1

Revised 2/26/2010