

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF FLORIDA  
PANAMA CITY DIVISION

UNITED STATES OF AMERICA

v.

SEALED  
INDICTMENT

5:19cr77-TKW

DUANE EDWARD CRAWSON  
JEREMIAH JOE ROLLING  
JORDAN RYAN HICKS  
DAVEY EUGENE MANCILL  
JAMES STACEY PAUL  
KYLE MARTIN HUDSON  
CHRISTOPHER MARION AMMONS  
DANYEL MICHELLE WITT  
SHERYL DAY GILLMAN  
SHYLOE ROSE SACHSE  
TILLMAN DOUGLAS MEARS  
DAWN MARIE CRUTCHFIELD  
JUSTIN MIKEL CHOPELAS  
RONALD RYAN ROOF  
MEGAN LEANN ROOF  
BILLY COAL BRADSHAW  
JAMES ERWIN MANCILL  
JOSEPH MATTHEW CROWDER  
AUDREY LYNN SMITH  
BRIAN ANTHONY AMMONS  
TAYLOR WARD STRIPLING  
DAWN MARIE ROOF  
DANIEL OLAJUWON BOSTON  
CHASSITY LYNN LEE  
JENNIFER MARIE MCCABE  
JUSTINA RAE WILLIAMS  
JOSEPH BAILEY ALEXANDER  
DOUGLAS EDWARD MIXON  
and  
DWAYNE FRAZIER WHITE

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**THE GRAND JURY CHARGES:**

**COUNT ONE**

**A. INTRODUCTION**

At all times material to this Indictment:

1. Defendant **DUANE EDWARD CRAWSON** was the County Executive Director of the United States Department of Agriculture's Farm Service Agency ("FSA") for Bay, Holmes, and Washington County, Florida.
2. As the County Executive Director, **DUANE EDWARD CRAWSON** was responsible for administering various United States Department of Agriculture Farm Programs to include the Livestock Forage Disaster Program ("LFP").
3. The LFP provided government payments to eligible livestock owners who suffered grazing losses as a result of a qualifying drought, based upon the number of livestock owned during the drought and the amount of land used to sustain the livestock.
4. The FSA determined that both Holmes and Washington County, Florida, suffered qualifying drought conditions during the grazing season of calendar year 2016, and were eligible to receive LFP funding.

5. As the County Executive Director, **DUANE EDWARD CRAWSON** was responsible for the review and processing of all LFP claims submitted to the FSA for Holmes and Washington County, Florida.

**B. THE CONSPIRACY**

Between on or about May 31, 2017, and on or about December 21, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
JEREMIAH JOE ROLLING,  
JORDAN RYAN HICKS,  
DAVEY EUGENE MANCILL,  
JAMES STACEY PAUL,  
KYLE MARTIN HUDSON,  
CHRISTOPHER MARION AMMONS,  
DANYEL MICHELLE WITT,  
SHERYL DAY GILLAM,  
SHYLOE ROSE SACHSE,  
TILLMAN DOUGLAS MEARS,  
DAWN MARIE CRUTCHFIELD,  
JUSTIN MIKEL CHOPELAS,  
RONALD RYAN ROOF,  
MEGAN LEANN ROOF,  
BILLY COAL BRADSHAW,  
JAMES ERWIN MANCILL,  
JOSEPH MATTHEW CROWDER,  
AUDREY LYNN SMITH,  
BRIAN ANTHONY AMMONS,  
TAYLOR WARD STRIPLING,  
DAWN MARIE ROOF,  
DANIEL OLAJUWON BOSTON,  
CHASSITY LYNN LEE,  
JENNIFER MAIRE MCCABE,**

**JUSTINA RAE WILLIAMS,  
JOSEPH BAILEY ALEXANDER,  
DOUGLAS EDWARD MIXON,  
and,  
DWAYNE FRAZIER WHITE,**

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons to devise and intend to devise a scheme to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, and, for the purpose of executing this scheme, to cause wire communications to be transmitted in interstate commerce, in violation of Title 18, United States Code, Section 1343.

**C. MANNER AND MEANS**

It was part of this conspiracy that:

1. While employed as County Executive Director of the Farm Service Agency, **DUANE EDWARD CRAWSON** made and caused to be made false and fraudulent representations in Livestock Forage Disaster Program applications to fraudulently obtain money from the United States Department of Agriculture.
2. **DUANE EDWARD CRAWSON** solicited the personal identifying information (“PII”) of the conspirators, to include their names and social security numbers, in addition to the conspirators’ bank account and routing numbers.

3. **DUANE EDWARD CRAWSON** falsely reflected livestock and parcels of farmland that were not owned or leased by the conspirators in the fraudulent LFP applications, causing drought assistance funds of the United States Department of Agriculture to be deposited into the conspirators' bank accounts.

4. After the direct deposit of the fraud proceeds, the conspirators withdrew cash from their bank accounts and paid **DUANE EDWARD CRAWSON** an agreed upon percentage of the fraud proceeds in the form of cash kickbacks.

5. By this conduct, the conspirators fraudulently obtained, and attempted to obtain, United States Department of Agriculture drought assistance funds totaling approximately \$373,483.

All in violation of Title 18, United States Code, Section 1349.

## **COUNT TWO**

On or about May 31, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
and  
**JEREMIAH JOE ROLLING,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than

\$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$2,313.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THREE**

On or about July 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON  
and  
JORDAN RYAN HICKS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$11,876.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT FOUR**

On or about July 28, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**JORDAN RYAN HICKS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$12,166.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT FIVE**

On or about August 3, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,**  
**JORDAN RYAN HICKS,**  
**and**  
**CHRISTOPHER MARION AMMONS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$17,596.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT SIX**

On or about August 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**KYLE MARTIN HUDSON,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$25,486.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT SEVEN**

On or about August 10, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**DANYEL MICHELE WITT,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than



\$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$2,885.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT EIGHT**

On or about August 29, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
JAMES STACEY PAUL,  
and  
DWAYNE FRAZIER WHITE,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$13,373.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT NINE**

On or about September 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**DANYEL MICHELE WITT,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$6,776.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TEN**

On or about September 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**DANYEL MICHELLE WITT,**

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name and social security number of S.E., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, theft of government money, as charged in Count Nine of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT ELEVEN**

On or about September 18, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**SHERYL DAY GILLMAN,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$7,329.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWELVE**

On or about September 19, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,**  
**SHERYL DAY GILLMAN,**  
**and**  
**SHYLOE ROSE SACHSE,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than

\$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$7,038.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTEEN**

On or about September 20, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON  
and  
JAMES STACEY PAUL,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$11,474.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT FOURTEEN**

On or about September 24, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**DAVEY EUGENE MANCILL,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$9,427.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT FIFTEEN**

On or about September 27, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,**  
**JAMES STACEY PAUL,**  
**and**  
**TILLMAN DOUGLAS MEARS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$16,906.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT SIXTEEN**

On or about September 29, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**DAVEY EUGENE MANCILL,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$7,918.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT SEVENTEEN**

On or about September 29, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**DAVEY EUGENE MANCILL,**

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name and social security number of A.H., during and

in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, theft of government money, as charged in Count Sixteen of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT EIGHTEEN**

On or about October 4, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
JAMES STACEY PAUL,  
and  
TILLMAN DOUGLAS MEARS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$8,966.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT NINETEEN**

On or about October 4, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON**  
**and**  
**JAMES STACEY PAUL,**

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

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT TWENTY**

On or about October 10, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,**  
**DAVEY EUGENE MANCILL,**  
**RONALD RYAN ROOF,**  
**and**  
**JUSTIN MIKEL CHOPELAS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$9,885.00, knowing such money to have been embezzled, stolen, and converted.



In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-ONE**

On or about October 10, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
RONALD RYAN ROOF,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$9,734.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-TWO**

On or about October 12, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
JAMES STACEY PAUL,  
and  
DAWN MARIE CRUTCHFIELD,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$3,858.08, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-THREE**

On or about October 18, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
MEGAN LEANN ROOF,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$9,796.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-FOUR**

On or about October 24, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
BILLY COAL BRADSAW,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$12,267.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-FIVE**

On or about October 24, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
JAMES ERWIN MANCILL,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than

\$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$10,592.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-SIX**

On or about November 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
JOSEPH MATTHEW CROWDER,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$9,569.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-SEVEN**

On or about November 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
AUDREY LYNN SMITH,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$7,969.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-EIGHT**

On or about November 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
JORDAN RYAN HICKS,  
and  
BRIAN ANTHONY AMMONS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$8,386.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT TWENTY-NINE**

On or about November 7, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
JORDAN RYAN HICKS,  
and  
TAYLOR WARD STRIPLING,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$8,322.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY**

On or about November 15, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON  
and  
JORDAN RYAN HICKS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$10,569.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY-ONE**

On or about November 15, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
DAWN MARIE ROOF,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$9,597.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY-TWO**

On or about November 21, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
DANIEL OLAJUWON BOSTON,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$12,082.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY-THREE**

On or about November 24, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
JAMES STACEY PAUL,  
and  
CHASSITY LYNN LEE,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than



\$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$9,583.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY-FOUR**

On or about December 14, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
JENNIFER MARIE MCCABE,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$5,548.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY-FIVE**

On or about December 14, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
JUSTINA RAE WILLIAMS,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$5,480.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY-SIX**

On or about December 21, 2017, in the Northern District of Florida and elsewhere, the defendants,

**DUANE EDWARD CRAWSON,  
DAVEY EUGENE MANCILL,  
and  
JOSEPH BAILEY ALEXANDER,**

knowingly and willfully did receive, conceal, and retain, with the intent to convert to their own use and gain, money of the United States, of a value of more than \$1,000, to wit, money of the Department of Agriculture, an agency of the United States, in the approximate amount of \$6,068.00, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT THIRTY-SEVEN**

From on or about January 1, 2017 through on or about December 31, 2017,  
in the Northern District of Florida and elsewhere, the defendant,

**DUANE EDWARD CRAWSON,**

a resident of Holmes County, Florida, willfully attempted to evade and defeat income tax due and owing by him and his spouse to the United States of America, for the calendar year 2017, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent United States Individual Income Tax Return, Form 1040, which was submitted to the Internal Revenue Service. On the tax return, Defendant reported and caused to be reported that his and his spouse's joint taxable income for calendar year 2017 was \$74,768.00, and that the amount of tax due and owing was \$10,284.00. In fact, as Defendant knew, Defendant and his spouse had joint taxable income for the calendar year 2017 that was greater than the amount reported on the tax return, and as a result of such additional taxable income, there was additional tax due and owing to the United States of America.

In violation of Title 26, United States Code, Section 7201.

### **COUNT THIRTY-EIGHT**

From on or about January 1, 2017, through on or about November 5, 2019,  
in the Northern District of Florida and elsewhere, the defendant,

**DUANE EDWARD CRAWSON,**

did corruptly endeavor to obstruct and impede the due administration of the internal revenue laws by instructing the conspirators of his unlawful kickback scheme to lie to federal investigators regarding the nature of the fraud proceeds, falsely implicating an innocent employee of the Farm Service Agency in the fraud, shredding fraudulent documents used in the kickback scheme, and filing with the Internal Revenue Service a false and fraudulent U.S. Individual Income Tax Return, Form, 1040, for calendar year 2017, which claimed a tax refund due of \$2,634.00, whereas **DUANE EDWARD CRAWSON** was not entitled to a tax refund in this amount.

In violation of Title 26, United States Code, Section 7212(a).

### **CRIMINAL FORFEITURE**

The allegations contained in Counts One through Nine, Eleven through Sixteen, Eighteen, and Twenty through Thirty-Six of this Indictment 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 their engagement in any or all of the violations alleged in Counts One through Nine, Eleven through Sixteen, Eighteen, and Twenty through Thirty-Six of this Indictment, the defendants,

**DUANE EDWARD CRAWSON,  
JEREMIAH JOE ROLLING,  
JORDAN RYAN HICKS,  
DAVEY EUGENE MANCILL,  
JAMES STACEY PAUL,  
KYLE MARTIN HUDSON,  
CHRISTOPHER MARION AMMONS,  
DANYEL MICHELLE WITT,  
SHERYL DAY GILLAM,  
SHYLOE ROSE SACHSE,  
TILLMAN DOUGLAS MEARS,  
DAWN MARIE CRUTCHFIELD,  
JUSTIN MIKEL CHOPELAS,  
RONALD RYAN ROOF,  
MEGAN LEANN ROOF,  
BILLY COAL BRADSHAW,  
JAMES ERWIN MANCILL,  
JOSEPH MATTHEW CROWDER,  
AUDREY LYNN SMITH,  
BRIAN ANTHONY AMMONS,  
TAYLOR WARD STRIPLING,  
DAWN MARIE ROOF,  
DANIEL OLAJUWON BOSTON,  
CHASSITY LYNN LEE,  
JENNIFER MAIRE MCCABE,  
JUSTINA RAE WILLIAMS,  
JOSEPH BAILEY ALEXANDER,**

**DOUGLAS EDWARD MIXON,  
and,  
DWAYNE FRAZIER WHITE,**

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 their rights, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offenses.

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

- 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 28, United States Code, Section 2461(c), and 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.

A TRUE BILL:



FOREPERSON

11/05/2019

DATE

Handwritten signature of Lawrence Keffe in black ink.

LAWRENCE KEFFE  
United States Attorney

Handwritten signature of Jason R. Coody in black ink.

JASON R. COODY  
Assistant United States Attorney