

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

FILED IN OPEN COURT
10-15-08

CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

THOMAS G. MANUEL

Case No. 3:08-cr-370-J-34 HTS
Cts. 1 & 2: 18 U.S.C. § 666(a)(1)(B)
Forfeiture: 18 U.S.C. § 981(a)(1)(c)
and 28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about April 10, 2008, at Jacksonville, in the Middle District of Florida, and elsewhere,

THOMAS G. MANUEL

the defendant herein, being an agent of an organization, and of a state and local government, and any agency thereof, namely the St. Johns County Commission, receiving in any one year period benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan guarantee, insurance, and other form of federal assistance, did knowingly and corruptly solicit, demand, accept and agree to accept, anything of value from any person, namely cash in the amount of approximately \$10,000, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such organization, government and agency involving anything of value of \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

COUNT TWO

On or about June 5, 2008, at Jacksonville, in the Middle District of Florida, and elsewhere,

THOMAS G. MANUEL

the defendant herein, being an agent of an organization, and of a state and local government, and any agency thereof, namely the St. Johns County Commission, receiving in any one year period benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan guarantee, insurance, and other form of federal assistance, did knowingly and corruptly solicit, demand, accept and agree to accept, anything of value from any person, namely cash in the amount of approximately \$50,000, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such organization, government and agency involving anything of value of \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

FORFEITURES

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

2. From his engagement in the violations alleged in Count One and Count Two of this Indictment, punishable by imprisonment for more than one year, the defendant

THOMAS G. MANUEL

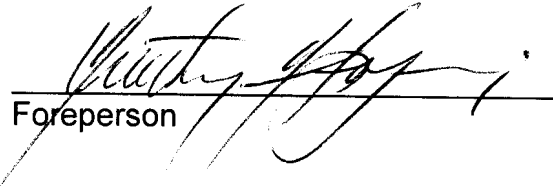
shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all of his interest in any property constituting or derived from proceeds obtained directly or indirectly as a result of the said violation(s).

3. If any of the property described above, as a result of any act or omission of the defendant:

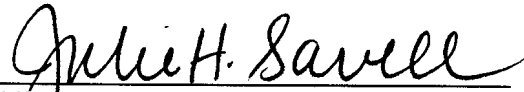
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,


Foreperson

A. BRIAN ALBRITTON
United States Attorney

By: 
JULIE HACKENBERRY SAVELL
Assistant United States Attorney

By: 
FRANK M. TALBOT
Assistant United States Attorney
Deputy Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT

Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

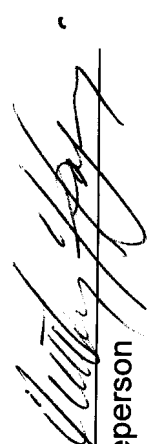
THOMAS G. MANUEL

INDICTMENT

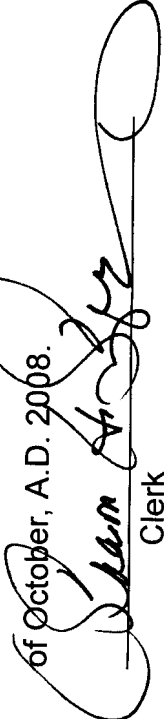
Violations:

18 U.S.C. § 666(a)(1)(B)

A true bill,


Foreperson

Filed in open court this 15th day

of October, A.D. 2008.

Clerk

Bail \$ _____