IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA *v.* ANDRE LEE GAINES	Criminal Information No. 1:21-CR-206

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about July 2, 2020, in the Northern District of Georgia, the defendant, ANDRE LEE GAINES, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating to a Special Agent of the Federal Bureau of Investigation that Gaines Reservation and Travel has 69 employees. The statement and representation were false because, as ANDRE LEE GAINES then and there knew, Gaines Reservation and Travel did not have any employees.

In violation of Title 18, United States Code, Section 1001.

Forfeiture

Upon conviction of the offense in violation of Title 18, United States Code, Section 1001 set forth in the Information, the defendant, ANDRE LEE GAINES, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(3), any property, real or personal, which represents or is traceable to the gross receipts obtained, directly or indirectly, as a result of such violation, including, but not limited to:

a. MONEY JUDGMENT: A sum of money in U.S. currency representing the value of the property involved in the offenses for which the defendant is convicted.

b. $177,828.46 in funds seized from JPMorgan Chase account number XXXXX6500 held in the name of Gaines Reservation and Travel.

c. $9,314.28 in funds seized from PNC Bank account number XXXXXX5124 held in the name of Gaines Reservation and Travel.

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 intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

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