

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 6:20-CR-29 _
v.	§	Judge: JDK/JDL
	§	
JESSICA ROTTAB	§	

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

Count One

Violation: 18 U.S.C. § 666)
(Federal Program Theft)

Beginning on or about before June 24, 2017 and continuing through September, 2018, within the Eastern District of Texas, **Jessica Rottab**, defendant, being an agent of an organization, to-wit: the East Texas Center for Independent Living (ETCIL), said organization receiving in the one year period, beginning January 1, 2017, benefits in excess of \$10,000.00 from the United States Department of Health and Human Services, intentionally and knowingly embezzled, stole, misapplied and obtained by fraud, property worth at least \$5,000 under the care, custody and control of ETCIL, that is funds intended for the benefit of ETCIL's clients, or consumers.

In violation of 18 U.S.C. § 666(a)(1)(A).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461

As the result of committing the foregoing offense alleged in Count 1 of this information, the defendant herein shall forfeit to the United States, pursuant to 18 U.S.C.

§ 981(a)(1)(C) and 28 U.S.C. § 2461:

1. any property constituting, or derived from, and proceeds the defendant obtained, directly or indirectly, as the result of such violation; and
2. any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

Cash Proceeds:

A sum of money equal to \$526,690.83 in United States currency and all interest and proceeds traceable thereto, representing the amount of proceeds obtained by the defendant as a result of the offense alleged in Count 1 of this information, for which the defendant is personally liable.

Substitute Assets:

If any of the property described above as being subject to forfeiture, 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 person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendant.

By virtue of the commission of the offense alleged in Count 1 of this information, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461.

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/ Jim Noble
JIM NOBLE
Assistant United States Attorney

May 19, 2020
Date

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NOTICE OF PENALTY

Count One

VIOLATION:	18 U.S.C. § 666(a)(1)(A) (Federal Program Theft)
PENALTY:	A fine of not more than \$250,000.00 or two times the pecuniary gain or loss caused by the offense; imprisonment for not more than ten (10) years; a term of supervised release of not more than three (3) years. 18 U.S.C. § 666.
SPECIAL ASSESSMENT:	\$100.00