

May 30, 2019

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. **19-20327-CR-ALTONAGA/GOODMAN**
18 U.S.C. § 1001(a)(2)

UNITED STATES OF AMERICA

vs.

TRACEY JORDAN SELLERS,

Defendant.

INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times material to this Information:


1. The defendant, **TRACEY JORDAN SELLERS**, was a civilian employee of the United States Army Corps of Engineers.
2. Federal ethics laws and regulations prohibited federal employees from engaging in outside employment or activities that conflicted with official Government duties and responsibilities. 5 C.F.R. § 2635.102(b)(10).
3. Federal ethics laws and regulations prohibited federal employees from substantial participation in any matter in which an employer, or a person with whom the employee was negotiating prospective employment, had a financial interest. 18 U.S.C. § 208(a).

FALSE OFFICIAL STATEMENTS
(18 U.S.C. § 1001(a)(2))

On or about February 8, 2019, in Jacksonville, Florida, in the Middle District of Florida, and elsewhere, in a matter within the jurisdiction of the Department of Defense, an agency of the executive branch of the United States Government, the defendant,

TRACEY JORDAN SELLERS,

did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact, in that the defendant represented to Special Agents with the Department of Defense Criminal Investigative Service, that she had not written anything, had not done anything, and had not participated in meetings relating to an offer of employment from an environmental consulting company, when in truth and in fact, and as the defendant then and there well knew, she had written material, had worked, and had participated in meetings relating to an offer of employment from an environmental consulting company, in violation of Title 18, United States Code, Section 1001(a)(2).



ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



JAIME A. RAICH
ASSISTANT UNITED STATES ATTORNEY

CASE NO.

CERTIFICATE OF TRIAL ATTORNEY*

Defendant.

Superseding Case Information:

New Defendant(s)

No

Number of New Defendants

Total number of counts

X

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

3. Interpreter: (Yes or No) NO
List language and/or dialect _____

5. Please check appropriate category and type of offense listed below:

(Check only one)

I	0 to 5 days	X
II	6 to 10 days	
II	11 to 20 days	
IV	21 to 60 days	
V:	61 days and over	

If yes:

Judge:

Case No.

(Attach copy of dispositive order)

(Yes or No) NO

If yes:

Magistrate Case No.

Related Miscellaneous numbers:


Defendant(s) in federal custody as of

Defendant(s) in state custody as of

Rule 20 from the _____ District of _____

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes ☒ X No ☐


 JAIMIE A. RAICH
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 40111

**PUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: TRACEY JORDAN SELLERS

Case No: _____

Count #: 1

False Official Statement _____

Title 18, United States Code, Section 1001(a)(2) _____

*** Max. Penalty:** Five (5) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America
v.
TRACEY JORDAN SELLERS,

Defendant

)
) Case No.
)
)
)

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: _____

Defendant's signature

Signature of defendant's attorney

Printed name of defendant's attorney

Judge's signature

Judge's printed name and title