

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

RECEIVED
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CLERK OF THE
DISTRICT COURT
ST. CROIX, V.I.

THE UNITED STATES OF AMERICA and
THE PEOPLE OF THE VIRGIN ISLANDS :

-v.- :
:

Cr. No.:

ALVIN L. WILLIAMS, JR., :
ACE DEVELOPMENT, Inc., :
GARRY SPRAUVE, and :
KIM A. BLACKETT, :

Defendants. :

The Grand Jury Charges:

COUNT ONE
RACKETEER INFLUENCED AND CORRUPT ORGANIZATION (RICO)

The Enterprise

At all times relevant to this Indictment:

1. The Legislature of the Virgin Islands, as established by the United States Congress, Title 48, United States Code, Section 1571(a), was the legislative branch of the Government of the United States Virgin Islands empowered by Congress with the legislative power and authority of the Government of the Virgin Islands pursuant to Title 48, United States Code, Section 1574, and was a legal entity which constituted an "Enterprise" engaged in, and the activities of which affected, interstate commerce as defined in Title 18, United States Code, Section 1961(4).

2. Pursuant to Title 48, United States Code, Section 1571(b), the Enterprise was composed of members known as senators.

3. Defendant ALVIN L. WILLIAMS, Jr. was a senator of the Enterprise.

4. Defendant ALVIN L. WILLIAMS, Jr., maintained and supervised the operation of his senatorial offices, including staff members and others at the Enterprise located in St. Thomas, in the United States Virgin Islands.

5. The Enterprise was engaged in, and its activities affected, interstate commerce.

The Purpose of the Defendant

6. The Defendant ALVIN L. WILLIAMS, Jr., together with others known and unknown to the grand jury, used the Enterprise to engage in illegal activities for the purpose of enriching himself and others and promoting his position and that of others within and in relation to the Enterprise.

The Role of the Defendant

7. Defendant ALVIN L. WILLIAMS, Jr., was a leader of the Enterprise who directed other members and associates of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

Means and Methods

8. Defendant ALVIN L. WILLIAMS, Jr., and other members and associates of the Enterprise, participated in the conduct of the affairs of the Enterprise through a pattern of racketeering and thereby enriched themselves of money and property and abused positions of trust in the Enterprise as Senator.

The Racketeering Violation

9. From in or about January of 2007, to in or about December of 2011, in the District of the United States Virgin Islands and elsewhere, the Defendant ALVIN L. WILLIAMS, Jr., together with others known and unknown to the grand jury, being persons employed by and associated with the Enterprise described above, which was an enterprise engaged in, and the activities of which affected

interstate commerce, unlawfully and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of that Enterprise through a pattern of racketeering activity, that is, through the commission of Racketeering Acts 1 through 8.

The Pattern of Racketeering Activity

10. The pattern of racketeering activity as defined in Title 18, United States Code, Section 1961(1), consisted of the following acts:

11. Racketeering Act 1—Virgin Islands Attempted Bribery of a Public Official

ALVIN L. WILLIAMS, Jr., Defendant herein, committed an act involving bribery, in that, on or about September 5, 2009, ALVIN L. WILLIAMS, Jr., did give and offer, and caused to be given and offered, a bribe, and money, property, and something of value, and a promise and agreement therefor, to a public officer, and to a person executing the functions of a public office, and to a person elected, appointed and designated to thereafter execute the same, with intent to influence that person in respect to an act, decision, vote, opinion and other proceedings, in the exercise of the powers and functions which the person had; in violation of Title 14, Virgin Islands Code, Sections 406 and 331.

In order to facilitate the foregoing, in conjunction with the deposit of a check in the amount of one hundred thirty-four thousand and one hundred forty dollars (\$134,140.00) from the Government of the Virgin Islands into a bank account associated with a company known as Ace Development, Inc., in which Defendant ALVIN L. WILLIAMS, Jr., had an interest, and the withdrawal of twenty-four thousand dollars (\$24,000.00) in cash from said bank account, Defendant ALVIN L. WILLIAMS, Jr., corruptly gave ten thousand dollars (\$10,000.00) cash to the Commissioner of the Virgin Islands Department of Public Works, intending to influence said Commissioner of the Virgin Islands Department of Public Works and the Virgin Islands Department of Public Works with regard to the future granting of work to said company.

12. Racketeering Act 2—Virgin Islands Solicitation and Receipt of a Bribe

ALVIN L. WILLIAMS, Jr., Defendant herein, committed an act involving bribery, in that, from on or about February 21, 2007, to on or about November 18, 2011, ALVIN L. WILLIAMS, Jr., being a public officer, asked and received an emolument, gratuity and reward, and promise thereof, except as such as may be authorized by law, for doing an official act; to wit, a bribe, money, property, and something of value, with intent to influence said ALVIN L. WILLIAMS, Jr., in relation to the official act; in violation of Title 14, Virgin Islands Code, Section 403.

In order to facilitate the foregoing, Defendant ALVIN L. WILLIAMS, Jr., as Senator of the Legislature of the United States Virgin Islands, influenced and promoted legislative action and otherwise acted in support of the authorization of funding and zoning of the Raphune Vista(s) housing project; in exchange for which a company known as Ace Development, Inc., in which Defendant ALVIN L. WILLIAMS, Jr., had an interest, received a contract related to the construction of the Raphune Vista(s) housing project, valued as much as two million dollars (\$2,000,000.00) and for which said company received a benefit of approximately seven hundred eighty nine thousand four hundred seventy-seven dollars and forty-nine cents (\$789,477.49); and as part of that contract, said company, known as Ace Development, Inc. used and/or rented to the developers of the housing project pieces of construction equipment, as specified in the forfeiture allegations below, which afforded an influence over and furthered the racketeering activities of the Enterprise.

13. ALVIN L. WILLIAMS, Jr., the Defendant, committed the following acts of racketeering, either of which constitutes the commission of Racketeering Act 3:

A. Racketeering Act 3(a)—Virgin Islands Solicitation and Receipt of a Bribe

ALVIN L. WILLIAMS, Jr., Defendant herein, committed an act involving bribery, in that, between on or about September 1, 2008, and on or about September 30, 2008, ALVIN L. WILLIAMS, Jr., being a public officer, asked and received an emolument, gratuity and reward, and promise thereof, except as such as may be authorized by law, for doing an official act; to wit, a bribe, money, property, and

something of value, with intent to influence said ALVIN L. WILLIAMS, Jr., in relation to the official act; in violation of Title 14, Virgin Islands Code, Section 403.

In order to facilitate the foregoing, ALVIN L. WILLIAMS, Jr., Defendant herein, solicited a bribe of ten thousand dollars (\$10,000.00) in the form of campaign contributions from the developers of the Tutu Park Mall wind turbine project, in exchange for which Defendant ALVIN L. WILLIAMS, Jr., as a senator of the Legislature of the United States Virgin Islands, influenced and promoted legislative action by the Legislature of the United States Virgin Islands, and otherwise act, in support of the Tutu Park Mall wind turbine project.

B. Racketeering Act 3(b)—Federal Mail Fraud Related to Virgin Islands Solicitation and Receipt of a Bribe

From on or about September 1, 2008, to on or about September 30, 2008, ALVIN L. WILLIAMS, Jr., Defendant herein, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, in facilitation of the solicitation and receipt of a bribe as set forth previously in Racketeering Act 3(a), delivered and caused to be delivered a matter and thing to be sent and delivered by the United States Postal Service and any private and commercial interstate carrier according to the direction thereon for the purpose of executing said scheme or artifice; in violation of Title 18, United States Code, Section 1341.

In order to facilitate the foregoing, ALVIN L. WILLIAMS, Jr., Defendant herein, solicited and received a bribe of ten thousand dollars (\$10,000.00) in the form of campaign contributions from the developers of the Tutu Park Mall wind turbine project, in exchange for which Defendant ALVIN L. WILLIAMS, Jr., as a senator of the Legislature of the United States Virgin Islands, influenced and promoted legislative action by the Legislature of the United States Virgin Islands, and otherwise acted, in support of the Tutu Park Mall wind turbine project; and which contributions Defendant ALVIN L. WILLIAMS, Jr., did not report as required by Virgin Islands law.

14. Racketeering Act 4—Virgin Islands Solicitation of a Bribe

ALVIN L. WILLIAMS, Jr., Defendant herein, committed an act involving bribery, in that, between on or about September 22, 2008, and in or about September of 2009, Defendant ALVIN L. WILLIAMS, Jr., being a public officer, asked and received an emolument, gratuity and reward, and promise thereof, except as such as may be authorized by law, for doing an official act; to wit, a bribe, money, property, and something of value, with intent to influence said ALVIN L. WILLIAMS, Jr., in relation to the official act; in violation of Title 14, Virgin Islands Code, Section 403.

In order to facilitate the foregoing, ALVIN L. WILLIAMS, Jr., solicited a bribe of twenty-five thousand dollars (\$25,000.00) from the developers of the Tutu Park Mall wind turbine project, in exchange for which Defendant ALVIN L. WILLIAMS, Jr., as a senator of the Legislature of the United States Virgin Islands, promoted and influenced legislative action and otherwise acted, in support of the Tutu Park Mall wind turbine project.

15. Racketeering Act 5—Virgin Islands Solicitation of a Bribe

ALVIN L. WILLIAMS, Jr., Defendant herein, committed an act involving bribery, in that, in or about Summer 2010, Defendant ALVIN L. WILLIAMS, Jr., being a public officer, asked and received an emolument, gratuity and reward, and promise thereof, except as such as may be authorized by law, for doing an official act; to wit, a bribe, money, property, and something of value, with intent to influence said ALVIN L. WILLIAMS, Jr., in relation to the official act; in violation of Title 14, Virgin Islands Code, Section 403.

In order to facilitate the foregoing, Defendant ALVIN L. WILLIAMS, Jr., in his capacity as senator of the Legislature of the United States Virgin Islands, offered to increase the salary of a legislative staff member; in exchange for which the legislative staff member would withdraw a portion of the increased salary in cash and make the same available to Defendant ALVIN L. WILLIAMS, Jr.

16. ALVIN L. WILLIAMS, Jr., the Defendant, committed the following acts of racketeering, either of which constitutes the commission of Racketeering Act 6:

A. Racketeering Act 6(a)—Virgin Islands Solicitation of a Bribe

ALVIN L. WILLIAMS, Jr., Defendant herein, committed an act involving bribery, in that, in or about August of 2010, Defendant ALVIN L. WILLIAMS, Jr., being a public officer, asked and received an emolument, gratuity and reward, and promise thereof, except as such as may be authorized by law, for doing an official act; to wit, a bribe, money, property, and something of value, with intent to influence said ALVIN L. WILLIAMS, Jr., in relation to the official act; in violation of Title 14, Virgin Islands Code, Section 403.

In order to facilitate the foregoing, Defendant ALVIN L. WILLIAMS, Jr., in his capacity as senator of the Legislature of the United States Virgin Islands, offered to increase the salary of a legislative staff member, allegedly for legislative work merit; in exchange for which the legislative staff member would withdraw a portion of the increased salary in cash and make the same available to Defendant ALVIN L. WILLIAMS, Jr.

B. Racketeering Act 6(b)—Virgin Islands Receipt of a Bribe

ALVIN L. WILLIAMS, Jr., Defendant herein, committed an act involving bribery, in that, from in or about September of 2010, to on or about July 28, 2011, Defendant ALVIN L. WILLIAMS, Jr., being a public officer, asked and received an emolument, gratuity and reward, and promise thereof, except as such as may be authorized by law, for doing an official act; to wit, a bribe, money, property, and something of value, with intent to influence said ALVIN L. WILLIAMS, Jr., in relation to the official act; in violation of Title 14, Virgin Islands Code, Section 403.

In order to facilitate the foregoing, Defendant ALVIN L. WILLIAMS, Jr., in his capacity as senator of the Legislature of the United States Virgin Islands, increased the salary of a legislative staff member, allegedly for legislative work merit; in exchange for which the legislative staff member withdrew a portion of the increased salary in cash and made the same available to Defendant ALVIN L. WILLIAMS, Jr.

17. Racketeering Act 7—Federal Wire Fraud related to an On-line College Degree

From in or about April of 2007, to in or about February of 2008, Defendant ALVIN L. WILLIAMS, Jr., having devised and intending to devise a scheme and artifice to defraud, and for obtaining of money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, a writing, sign, signal, picture, and sound for the purpose of executing said scheme or artifice; in violation of Title 18, United States Code, Section 1343.

In order to facilitate the foregoing, Defendant ALVIN L. WILLIAMS, Jr., and a legislative staff member used wire communication in conjunction with and in furtherance of Defendant ALVIN L. WILLIAMS, Jr., seeking an on-line degree from the University of Phoenix, and in Defendant ALVIN L. WILLIAMS, Jr., and the legislative staff member falsely submitting and causing to be submitted curriculum-related information, papers, assignments, and course materials generated, created and authored by individuals under the direction of but in the name of Defendant ALVIN L. WILLIAMS, Jr.

18. Racketeering Act 8—Federal Wire Fraud related to an On-line College Degree

From in or about January of 2008, to on or about October 5, 2011, Defendant ALVIN L. WILLIAMS, Jr., having devised and intending to devise a scheme and artifice to defraud, and for obtaining of money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, a writing, sign, signal, picture, and sound for the purpose of executing said scheme or artifice; in violation of 18, United States Code, Section 1343.

In order to facilitate the foregoing, Defendant ALVIN L. WILLIAMS, Jr., and a legislative staff member used wire communication in conjunction with and in furtherance of Defendant ALVIN L. WILLIAMS, Jr., seeking an on-line degree from the University of Phoenix, and Defendant ALVIN L. WILLIAMS, Jr., and the legislative staff member falsely submitting and causing to be submitted

curriculum-related information, papers, assignments, and course materials generated, created and authored by individuals under the direction of but in the name of Defendant ALVIN WILLIAMS, Jr.

Defendant ALVIN L. WILLIAMS, Jr., falsely submitted and caused to be submitted to a Federal student financial aid lending institution information and documents falsely representing Defendant ALVIN L. WILLIAMS, Jr., as the person actually doing the University of Phoenix on-line degree course work;

All in violation of Title 18, United States Code, Section 1962(c).

COUNT TWO
FEDERAL PROGRAM BRIBERY

Between on or about June 1, 2009, and on or about December 31, 2009, in the District of the United States Virgin Islands,

ALVIN L. WILLIAMS, Jr., and
ACE DEVELOPMENT, Inc.,

Defendants herein, did corruptly give, offer and agree to give something of value to a person, with intent to influence and reward an agent of the Government of the Virgin Islands, which territory and corresponding Government received Federal benefits in excess of ten thousand dollars (\$10,000.00) in a corresponding one-year period, in connection with a business, transaction, and series of transactions of the Government of the Virgin Islands involving something of value of five thousand dollars (\$5,000.00) or more; that is, in conjunction with the deposit of a check in the amount of one hundred thirty-four thousand and one hundred forty dollars (\$134,140.00) from the Virgin Islands Department of Public Works into a bank account associated with Defendant ACE DEVELOPMENT, Inc., for a project previously awarded ACE DEVELOPMENT, Inc., by the Virgin Islands Department of Public Works, which Virgin Islands Government and Department of Public Works received in excess of ten thousand dollars (\$10,000.00) in the same year; and the withdrawal of twenty-four thousand dollars (\$24,000.00) in cash from said bank account Defendant ACE DEVELOPMENT, Inc.; Defendant ALVIN L. WILLIAMS, Jr., corruptly gave

ten thousand dollars (\$10,000.00) cash to the Commissioner of the Virgin Islands Department of Public Works, intending to influence said Commissioner of the Virgin Islands Department of Public Works and the Virgin Islands Department of Public Works with regard to the future granting of work to Defendant ACE DEVELOPMENT, Inc.; and aided and abetted the same; in violation of Title 18, United States Code, Sections 666(a)(2) and 2

COUNT THREE
VIRGIN ISLANDS BRIBERY

Between on or about June 1, 2009, and on or about December 31, 2009, in the District of
the United States Virgin Islands,

ALVIN L. WILLIAMS, Jr., and
ACE DEVELOPMENT, Inc.,

Defendants herein, did give and offer, and caused to be given and offered, a bribe, and money, property, and something of value, and a promise and agreement therefor, to a public officer, and to a person executing the functions of a public office, and to a person elected, appointed and designated to thereafter execute the same, with intent to influence that person in respect to an act, decision, vote, opinion and other proceedings, in the exercise of the powers and functions which the person had; that is, in conjunction with the deposit of a check in the amount of one hundred thirty-four thousand and one hundred forty dollars (\$134,140.00) from the Government of the Virgin Islands into a bank account associated with Defendant ACE DEVELOPMENT, Inc., and the withdrawal of twenty-four thousand dollars (\$24,000.00) in cash from said bank account, Defendant ALVIN L. WILLIAMS, Jr., corruptly gave ten thousand dollars (\$10,000.00) cash to the Commissioner of the Virgin Islands Department of Public Works, intending to influence said Commissioner of the Virgin Islands Department of Public Works and the Virgin Islands Department of Public Works with regard to the future granting of work to Defendant ACE DEVELOPMENT, Inc.; and aided and abetted the same; in violation of Title 14, Virgin Islands Code,

Sections 406, 331 and 11.

COUNT FOUR
VIRGIN ISLANDS CONFLICT OF INTEREST RELATED TO BRIBERY

Between on or about June 1, 2009, and on or about December 31, 2009, in the District of the United States Virgin Islands,

ALVIN L. WILLIAMS, Jr., and
ACE DEVELOPMENT, Inc.,

Defendants herein, Defendant ALVIN L. WILLIAMS, Jr., being a territorial officer and employee of the Government of the Virgin Islands and a member of the Legislature of the United States Virgin Islands, did knowingly have an interest, financial and otherwise, direct and indirect, in a transaction which was in substantial conflict with the proper discharge of his official duties in the public interest and of his responsibilities as prescribed in the laws of the Virgin Islands; that is, in conjunction with the deposit of a check in the amount of one hundred thirty-four thousand and one hundred forty dollars (\$134,140.00) from the Government of the Virgin Islands into a bank account associated with Defendant ACE DEVELOPMENT, Inc., for a project previously awarded ACE DEVELOPMENT, Inc., by the Virgin Islands Department of Public Works, and the withdrawal of twenty-four thousand dollars (\$24,000.00) in cash from said bank account, Defendant ALVIN L. WILLIAMS, Jr., corruptly gave ten thousand dollars (\$10,000.00) cash to the Commissioner of the Virgin Islands Department of Public Works, in an effort to secure the future award of work by the Virgin Islands Department of Public Works to Defendant ACE DEVELOPMENT Inc., in which company Defendant ALVIN L. WILLIAMS, Jr., had an interest and from which the Defendant ALVIN L. WILLIAMS, Jr. would receive a benefit, financial and otherwise; and aided and abetted the same; in violation of Title 3, Virgin Islands Code, Sections 1101, 1102(3), 1103, and 1108; and Title 14, Virgin Islands Code, Section 11.

COUNT FIVE
VIRGIN ISLANDS BRIBERY

From on or about February 21, 2007, to on or about November 18, 2011, in the District of the United States Virgin Islands,

ALVIN L. WILLIAMS, Jr.,

Defendant herein, being a public officer, asked and received an emolument, gratuity and reward, and a promise thereof, except such as may be authorized by law, for doing an official act; that is, Defendant ALVIN L. WILLIAMS, Jr., as a senator of the Legislature of the United States Virgin Islands, promoted and influenced legislative action and otherwise acted in support of the authorization of funding and zoning of the Raphune Vista(s) housing project; in exchange for which a Virgin Islands company in which Defendant ALVIN L. WILLIAMS, Jr., had an interest, received a contract related to the construction of the Raphune Vista(s) housing project; in violation of Title 14, Virgin Islands Code, Sections 403 and 331.

COUNT SIX
VIRGIN ISLANDS CONSPIRACY RELATED TO FRAUDULENT CLAIMS UPON GOVERNMENT

From on or about January 1, 2006, to on or about December 31, 2011, in the District of the United States Virgin Islands,

ALVIN L. WILLIAMS, Jr., and
GARRY SPRAUVE,

Defendants herein, did knowingly and unlawfully conspire together, and with persons known and unknown to the grand jury, to knowingly and willfully falsify, conceal, and covered up a material fact by trick, scheme, and device, and did make a false and fraudulent statement and representation in a matter within the jurisdiction of an officer, department, board, commission, and other agency of the Government of the Virgin Islands; in violation of Title 14, Virgin Islands Code, Sections 843(2) and (3)

In furtherance of the conspiracy, the Defendants committed overt acts, including but not limited to the following:

Defendant ALVIN L. WILLIAMS, Jr., while senator of the Legislature of the United States Virgin Islands established a bank account as a campaign fund depository and disbursement mechanism.

Defendant ALVIN L. WILLIAMS, Jr., as senator of the United States Virgin Islands, and Defendant GARRY SPRAUVE, as senior advisor to ALVIN L. WILLIAMS, Jr., did not report campaign contributions as required by Virgin Islands law.

Defendants ALVIN L. WILLIAMS, Jr., and GARRY SPRAUVE made individual expenditures from the campaign account.

Defendants ALVIN L. WILLIAMS, Jr., and GARRY SPRAUVE did not report campaign account expenditures as required by Virgin Islands law.

Defendants ALVIN L. WILLIAMS, Jr., and GARRY SPRAUVE made cash expenditures on behalf of Defendant and candidate ALVIN L. WILLIAMS, Jr., other than petty cash expenditures, in violation of Virgin Islands law.

Defendants ALVIN L. WILLIAMS, Jr., and GARRY SPRAUVE did not deposit contributions into the requisite campaign account as required by Virgin Islands law.

Defendants ALVIN L. WILLIAMS, Jr., and GARRY SPRAUVE made false representations and statements to the Government of the Virgin Islands Board of Elections in submitting Campaign Disclosure Report(s).

All in violation of Title 14, Virgin Islands Code, Sections 551 and 552.

COUNT SEVEN
VIRGIN ISLANDS OBTAINING MONEY BY FALSE PRETENSES

From in or about September of 2010, to on or about July 28, 2011, in the District of the Virgin Islands,

ALVIN L. WILLIAMS, Jr., and
GARRY SPRAUVE,

Defendants herein, knowingly and designedly, by false and fraudulent representations and pretenses, defrauded another person of property and money; that is, Defendant ALVIN L. WILLIAMS, Jr., as senator of the Legislature of the United States Virgin Islands, increased the salary of Defendant GARRY SPRAUVE, a member of ALVIN L. WILLIAMS, Jr.'s, legislative staff, allegedly for legislative work merit, but with Defendant GARRY SPRAUVE withdrawing a portion of the increased salary in cash in behalf of and making the same available to Defendant ALVIN L. WILLIAMS, Jr.; and aided and abetted the same; in violation of Title 14, Virgin Islands Code, Sections 834(2) and 11.

COUNT EIGHT

VIRGIN ISLANDS EMBEZZLEMENT AND FALSIFICATION OF A PUBLIC ACCOUNT

From in or about September of 2010, to on or about July 28, 2011, in the District of the United States Virgin Islands,

ALVIN L. WILLIAMS, Jr., and
GARRY SPRAUVE,

Defendants herein, ALVIN L. WILLIAMS, Jr., being a public officer and person charged with the receipt, safekeeping, transfer and disbursement of public monies, appropriated the same, and a portion thereof to his own use and the use of another; without authority of law; that is, Defendant ALVIN L. WILLIAMS, Jr., as senator of the Legislature of the United States Virgin Islands, increased the salary of Defendant GARRY SPRAUVE, a member of ALVIN L. WILLIAMS, Jr.'s, legislative staff, allegedly for legislative work merit; but with Defendant GARRY SPRAUVE withdrawing a portion of the increased salary in cash and making the same available Defendant ALVIN L. WILLIAMS, Jr.; and aided and abetted the same; in violation of Title 14, Virgin Islands Code, Sections 1662(1) and 11.

COUNT NINE
VIRGIN ISLANDS OBTAINING MONEY BY FALSE PRETENSE RELATED TO AN ON-LINE
UNIVERSITY DEGREE.

From on or about January 1, 2008, to on or about October 5, 2011, in the District of the Virgin Islands,

ALVIN L. WILLIAMS, Jr., and
KIM A. BLACKETT,

Defendants herein, knowingly and designedly, by false and fraudulent representations and pretenses, defrauded another person of property and money; that is, Defendant ALVIN L. WILLIAMS, Jr., as a senator of the Virgin Islands Legislature, paid Defendant KIM A. BLACKETT, a legislative staff member, legislative and public funds for doing non-legislative work; namely, pursuing an on-line university degree for Defendant ALVIN L. WILLIAMS; and aided and abetted the same; in violation of Title 14, Virgin Islands Code, Sections 834(2) and 11.

FORFEITURE

1. The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant Title 18, United States Code, Sections 1963. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of the defendant's conviction under Counts One of this Indictment.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, the defendant, ALVIN WILLIAMS Jr., shall forfeit to the United States of America:

- a. any interest acquired or maintained in violation of section 1962;

- b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and
- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962.

The property to be forfeited includes, but is not limited to: proceeds from the violations of section 1962 in the amount of one million one hundred seventy-eight thousand five hundred and five dollars and 76 cents (\$1,178,505.76).

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

- 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 pursuant to Title 18, United States Code, Section 1963(m).

4. The allegations contained in Counts Two through Nine of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981, under the procedures of Title 21, United States Code, Section 853, pursuant to Title 28, United States Code, Section 2461(c). Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance

with Title 18, United States Code, Section 981 in the event of any Defendant's conviction under Counts Two through Nine of this Indictment for which forfeiture is authorized.

5. Pursuant to Title 18, United States Code, Section 981, and Title 28, United States Code, Section 2461(c), upon conviction of a violation of 18 U.S.C. § 666(a), the Defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violations. The property to be forfeited includes, but is not limited to, the following: bank accounts including Scotia Bank Account Nos. 96001803 and 96004317; Banco Popular Account Nos. 193-078956, 193-006677 and 192-867741; and Merchants Commercial Bank No. 10002061.

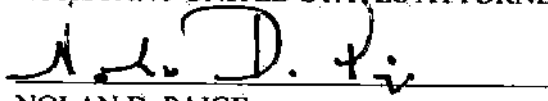
6. If any of the property described above, as a result of any act or omission of the Defendants:

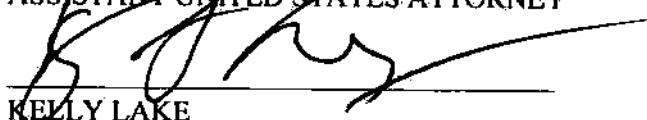
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

The Grand Jury returned a TRUE BILL

RONALD W. SHARPE
UNITED STATES ATTORNEY

By: 
KIM R. LINDQUIST
ASSISTANT UNITED STATES ATTORNEY

By: 
NOLAN D. PAIGE
ASSISTANT UNITED STATES ATTORNEY

By: 
KELLY LAKE
ASSISTANT UNITED STATES ATTORNEY

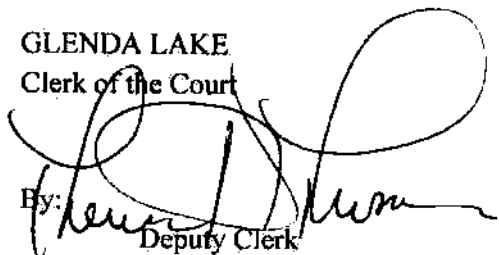

DISTRICT OF THE VIRGIN ISLANDS: November 8th, 2012.

Returned into the District Court by Grand Jurors and filed.


GEORGE CANNON
U.S. MAGISTRATE JUDGE

ATTEST:

GLENDALAKE
Clerk of the Court


By: 
Deputy Clerk