

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

UNITED STATES OF AMERICA,

v.

VIOLET ANNE GOLDEN, and  
STEPHANIE BARNES,

Defendants.

INDICTMENT

CRIMINAL NO. 2019-

47

**VIOLATIONS:**

Title 18, United States Code,  
Section 371

Title 18, United States Code,  
Section 666

Title 18, United States Code,  
Sections 1343

Title 18, United States Code,  
Section 1956

Title 14, Virgin Islands Code,  
Section 791

Title 14, Virgin Islands Code,  
Section 843

Title 14, Virgin Islands Code,  
Section 895

Title 33, Virgin Islands Code,  
Section 1524

**THE GRAND JURY CHARGES:**

**INTRODUCTION**

At all times relevant to this Indictment:

1. The Virgin Islands Casino Control Commission ("the Commission") was located in the United States Virgin Islands and was a component of the Government of the Virgin Islands authorized by Title 32, Virgin Islands Code, Section 420, to act in the name of the Government of the Virgin Islands.

2. The Commission was responsible for granting casino licenses and performing other gaming-related regulatory functions in the United States Virgin Islands.

3. **VIOLET ANNE GOLDEN** ("Golden") was the Chairperson of the Commission and an agent of the Virgin Islands Government. As such, she had a salary of \$105,000 per year.

4. During her time as Chairperson of the Commission, GOLDEN had generated significant outstanding personal debt, in particular with respect to her own personal credit cards.

5. **STEPHANIE BARNES** ("Barnes") was a contractor of the Commission purportedly performing services related to responsible gaming education. From 2015 to 2018, Barnes received over \$450,000 in Commission funds.

6. H.M. was the son of BARNES, and he was in no way employed or contracted to work on behalf of the Commission.

7. The Virgin Islands was a territory of the United States. In all years relevant to this Indictment, the Government of the Virgin Islands received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance.

8. Commission members were allowed to incur only those expenses authorized by the Legislature of the Virgin Islands in the Commission's annual budget.

9. Commission members were required to comply with procedures and regulations pertaining to travel by employees of the Executive Branch of the Government of the United States Virgin Islands.

10. The Commission was required by Virgin Islands law to file quarterly and annual financial reports, including descriptions of expenses incurred.

11. The Commission maintained multiple bank accounts, including a bank account known as the "Youth Account," funded by taxes on the revenues of Virgin Islands' casinos, and

according to Virgin Islands law Youth Account moneys were only to be used for specified youth-related programs.

12. A.R.G. was a separate entity from the Commission and received funds from taxes imposed on the revenues of Virgin Islands casinos. Such funds were to be used for responsible gaming-related activities.

13. D.C. was a casino operating in St. Croix, VI, and as such it was regulated by the Commission. In October 2015, under threat of closure, D.C. paid approximately \$473,000 to the Commission for purported back licensing fees.

#### **COUNT ONE**

*(Theft from Programs Receiving Federal Government Funds,  
18 U.S.C. § 666)*

14. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

15. From on or about January 1, 2015 through on or about December 31, 2015, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

#### **VIOLET ANNE GOLDEN**

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands

government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

| Subparagraph | Date (On or About)              | Amount     | Nature of Purchase                                                                  |
|--------------|---------------------------------|------------|-------------------------------------------------------------------------------------|
| a)           | January<br>December 2015        | \$2,776.10 | Dinners at Savant Restaurant, St. Croix, VI                                         |
| b)           | March 3, 2015                   | \$9,931.27 | Las Vegas travel, including first class airfare, for Golden and her family members. |
| c)           | April 4, 2015                   | \$7,000    | Westin St. John resort accommodations                                               |
| d)           | June 24, 2015 –<br>July 4, 2015 | \$3,979.57 | St. Kitts airfare and hotel for Barnes and H.M.                                     |
| e)           | June 26, 2015                   | \$110.70   | Airfare for L.P., a personal friend of Golden                                       |
| f)           | May 28, 2015 –<br>June 1, 2015  | \$3,049.74 | Travel for D.L., the son of Golden                                                  |
| g)           | July 15, 2015                   | \$3,974.01 | Car repairs for Barnes' personal vehicle                                            |
| h)           | August 13, 2015                 | \$2,193.55 | Centerline car rental for Golden and Barnes                                         |



|    |                                    |             |                                                                                       |
|----|------------------------------------|-------------|---------------------------------------------------------------------------------------|
| i) | July 16, 2015 –<br>August 12, 2015 | \$5,222.41  | Car repair for Barnes' personal vehicle                                               |
| j) | September 3, 2015                  | \$1,337.47  | Hertz Car rental for Barnes and H.M.                                                  |
| k) | September 15,<br>2015              | \$874.10    | Flight to Washington, D.C., for Barnes and H.M.                                       |
| l) | November 23, 2015                  | \$1,196.91  | Repair services for Golden's personal vehicle                                         |
| m) | November 25, 2015                  | \$14,624.20 | San Juan, Puerto Rico travel for Golden, Barnes, and H.M.                             |
| n) | December 22, 2015                  | \$5,889.03  | Airfare for Golden, Barnes, and H.M. for trip to Orlando from 12/30/2015 to 1/12/2016 |
| o) | December 23, 2015                  | \$2,097.08  | AT&T phones and speaker purchases                                                     |
| p) | December 27, 2015                  | \$1,593     | Walt Disney World                                                                     |
| q) | December 27, 2015                  | \$900       | Walt Disney World                                                                     |
| r) | December 27, 2015                  | \$1,038.39  | Walt Disney World                                                                     |

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

**COUNT TWO**

*(Theft from Programs Receiving Federal Government Funds,*

*18 U.S.C. § 666)*

16. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

17. From on or about January 1, 2016 through on or about December 31, 2016, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

**VIOLET ANNE GOLDEN**

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

| Subparagraph | Date (On or About) | Amount     | Nature of Purchase                             |
|--------------|--------------------|------------|------------------------------------------------|
| a)           | January 1, 2016    | \$496.21   | Walt Disney World                              |
| b)           | January 2, 2016    | \$396.18   | Cirque de Soleil tickets, Lake Buena Vista, FL |
| c)           | January 5, 2016    | \$2,478.13 | Rosen Hotels, Orlando, FL                      |
| d)           | January 5, 2016    | \$1,612.71 | Rosen Hotels, Orlando, FL                      |
| e)           | January 10, 2016   | \$1,931.81 | Rosen Hotels, Orlando, FL                      |

|    |                          |             |                                                                                                |
|----|--------------------------|-------------|------------------------------------------------------------------------------------------------|
| f) | January 10, 2016         | \$1,005.78  | Rosen Hotels, Orlando, FL                                                                      |
| g) | January 11, 2016         | \$205.24    | TJ Maxx purchases                                                                              |
| h) | January 11, 2016         | \$273.50    | TJ Maxx purchases, including ladies' shoes and lingerie                                        |
| i) | January 11, 2016         | \$206.24    | TJ Maxx purchases                                                                              |
| j) | January 12, 2016         | \$3,009.35  | Avis rental car purchase for trip to Orlando from 12/30/2015 to 1/12/2016                      |
| k) | January 12, 2016         | \$335.24    | Rosen Hotels, Orlando, FL                                                                      |
| l) | January 12, 2016         | \$704.29    | Rosen Hotels, Orlando, FL                                                                      |
| m) | January 25, 2016         | \$669.76    | Repair services for Golden's personal vehicle                                                  |
| n) | January 25, 2016         | \$399.60    | Centerline car rental for Golden                                                               |
| o) | March 23 - April 6, 2016 | \$19,897.02 | Miami trip, including travel advance                                                           |
| p) | April 4, 2016            | \$151.76    | Neiman Marcus purchase                                                                         |
| q) | March 28, 2016           | \$918.90    | TJ Maxx purchases, including ladies' shoes and lingerie                                        |
| r) | March 30, 2016           | \$636.67    | TJ Maxx purchases                                                                              |
| s) | May 11, 2016             | \$3,041.28  | Three business/first class airline tickets for Golden, Barnes, and H.M. for travel to New York |

|     |                               |             |                                                                                   |
|-----|-------------------------------|-------------|-----------------------------------------------------------------------------------|
|     |                               |             | scheduled for July 9, 2016 to July 19, 2016                                       |
| l)  | May 13, 2016                  | \$4,935.06  | Three tickets for Broadway production of "Hamilton" scheduled for July 11, 2016   |
| u)  | May 27, 2016                  | \$2,440.68  | Three airline tickets to St. Kitts for travel beginning June 22, 2016.            |
| v)  | June 7, 2016                  | \$1,050     | Crucian Gold purchase                                                             |
| w)  | June 26, 2016                 | \$1,450.65  | Tickets to St. Kitts Music Festival                                               |
| x)  | July 1, 2016                  | \$6,855     | Marriott hotel charges for travel to St. Kitts from June 22, 2016 - July 1, 2016. |
| y)  | July 16, 2016 - July 17, 2016 | \$535.00    | Payment for limo service from Westchester, NY to "Hamilton" production            |
| z)  | July 15, 2016 - July 19, 2016 | \$10,223.58 | Ritz-Carlton Hotel, Westchester, NY                                               |
| aa) | July 19, 2016                 | \$1,885.92  | Payment for rental Car for New York trip from July 9, 2016 to July 19, 2016       |

|     |                                   |             |                                                                                                                 |
|-----|-----------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------|
| bb) | August 9, 2016                    | \$3,500     | Check to R.C., but cash given to Golden                                                                         |
| cc) | September 1, 2016                 | \$2,802.54  | Marriott gift cards                                                                                             |
| dd) | September<br>November, 2016       | \$13,782.13 | Combined purchases for travel to Orlando from October 30, 2016 to November 7, 2016 for Golden, Barnes, and H.M. |
| ee) | November 2 –<br>November 21, 2016 | \$9,200.80  | Combined purchases for travel to Orlando from November 13, 2016 to November 18, 2016 for Golden                 |
| ff) | October 28, 2016                  | \$1,125.25  | Repair services for Golden's personal vehicle                                                                   |

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

### **COUNT THREE**

*(Theft from Programs Receiving Federal Government Funds,*

*18 U.S.C. § 666)*

18. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

19. From on or about January 1, 2017 through on or about December 31, 2017, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

**VIOLET ANNE GOLDEN**

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

| <b>Subparagraph</b> | <b>Date (On or About)</b>         | <b>Amount</b> | <b>Nature of Purchase</b>                                                                     |
|---------------------|-----------------------------------|---------------|-----------------------------------------------------------------------------------------------|
| a)                  | January 22 –<br>February 11, 2017 | \$20,243.35   | Atlanta and Orlando<br>travel for Golden,<br>Barnes, and H.M.,<br>including travel<br>advance |
| b)                  | February 7, 2017                  | \$1,098.82    | Nordstrom's clothing<br>purchases                                                             |
| c)                  | February 7, 2017                  | \$1,298.82    | Nordstrom's<br>purchases                                                                      |
| d)                  | February 8, 2017                  | \$282.11      | Cheesecake Factory<br>purchases                                                               |
| e)                  | February 16 – May<br>22, 2017     | \$13,885.59   | Dallas travel for<br>Golden, Barnes and                                                       |

|    |                             |             |                                                   |
|----|-----------------------------|-------------|---------------------------------------------------|
|    |                             |             | H.M. for May 2017,<br>including travel<br>advance |
| f) | April 8, 2017               | \$350.71    | Total Wine and More<br>purchases                  |
| g) | April 9, 2017               | \$415.62    | TJ Maxx purchases                                 |
| h) | April 9, 2017               | \$718.30    | Macy's Miami Beach<br>purchases                   |
| i) | April 10, 2017              | \$483.02    | TJ Maxx purchases                                 |
| j) | April 6 – April 10,<br>2017 | \$11,842.54 | Miami travel,<br>including travel<br>advance      |
| k) | April 9, 2017               | \$187.35    | Cheesecake Factory                                |
| l) | April 10, 2017              | \$213.90    | Cheesecake Factory                                |
| m) | April 10, 2017              | \$25.80     | Cheesecake Factory                                |
| n) | April 10, 2017              | \$405.00    | Cash withdrawal<br>from Commission<br>credit card |
| o) | May 15, 2017                | \$6,411     | Jewelry purchases                                 |
| p) | June 12, 2017               | \$1,602     | Western Union wire<br>of funds to L.P., a         |

|    |                  |            |                                                                                |
|----|------------------|------------|--------------------------------------------------------------------------------|
|    |                  |            | personal friend of<br>Golden                                                   |
| q) | June 19, 2017    | \$5,600    | Private jet flight for<br>trip to St. Kitts for<br>Golden, Barnes, and<br>H.M. |
| r) | June 16, 2017    | \$9,500    | Two checks to<br>Golden during St.<br>Kitts trip                               |
| s) | June 19, 2017    | \$434.64   | Kmart purchases of<br>personal items                                           |
| t) | June 30, 2017    | \$1,329.99 | iPhone 7 and<br>accessories purchases                                          |
| u) | July 25, 2017    | \$1,364.54 | Check to R.C.                                                                  |
| v) | December 3, 2017 | \$1,000    | Western Union wire<br>of funds to V.B.,<br>sister of Barnes.                   |

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.



**COUNT FOUR**

*(Theft from Programs Receiving Federal Government Funds, 18 U.S.C. § 666)*

20. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

21. From on or about January 1, 2018 through on or about December 31, 2018, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

**VIOLET ANNE GOLDEN**

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

| Subparagraph | Date (On or About) | Amount     | Nature of Purchase                          |
|--------------|--------------------|------------|---------------------------------------------|
| a)           | March 21, 2018     | \$699.99   | iPhone purchased for V.B., sister of Barnes |
| b)           | March 23, 2018     | \$1,026.84 | Check to R.C.                               |
| c)           | June 1, 2018       | \$1,400    | Check to R.C.                               |

|    |               |            |                                                       |
|----|---------------|------------|-------------------------------------------------------|
| d) | June 8, 2018  | \$1,009.29 | Avis Car Rental for Golden in Orlando, FL.            |
| e) | June 15, 2018 | \$206.99   | Western Union wire of funds to V.B., sister of Barnes |
| f) | July 6, 2018  | \$2,000    | Check to R.C., but cash went to Golden                |

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

#### **COUNT FIVE**

*(Conspiracy to Commit Theft from Programs Receiving Government Funds, 18 U.S.C. §§ 371)*

22. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

23. Beginning no later than June 1 2015, and continuing through in or about December 31, 2018, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendants,

#### **VIOLET ANNE GOLDEN and STEPHANIE BARNES**

and others known and unknown to the Grand Jury, did knowingly and unlawfully conspire to commit an offense against the United States, to wit, to embezzle, steal, obtain by fraud, without authority knowingly convert to their own use, and intentionally misapply, property that was valued at \$5,000 or more and was owned by and under the care, custody and control of an organization,

government, and agency which received more than \$10,000 in federal program benefits in a one-year period, in violation of Title 18, United States Code, Section 666.

*Manners and Means of the Conspiracy*

24. It was part of the conspiracy that **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** would and did execute a contract whereby **STEPHANIE BARNES** provided problem gaming services, despite the fact that **STEPHANIE BARNES** had no experience or education in problem gaming.

25. It was further part of the conspiracy that **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** would and did use the funds of the Commission for their own personal benefit.

26. It was further part of the conspiracy that **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** would and did create false and falsely-dated invoices for services not actually performed by Barnes.

*Overt Acts of the Conspiracy*

27. In furtherance of the conspiracy, and to effect the object thereof, **VIOLET ANNE GOLDEN**, **STEPHANIE BARNES**, and others committed and caused to be committed the following overt acts, among others, within the District of the Virgin Islands and elsewhere:

a. From on or about June 24, 2015 through on or about July 4, 2015, **STEPHANIE BARNES** and H.M. traveled to St. Kitts, paid for with the Commission credit card issued to **VIOLET ANNE GOLDEN**.

b. On or about a date no earlier than June 30, 2015 and no later than December 1, 2015, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** executed a contract requiring the

Commission to reimburse Barnes for travel for "one dependent party" to accompany Barnes on all Commission-related travel.

c. On or about December 27, 2015, **VIOLET ANNE GOLDEN** purchased tickets for Walt Disney World entertainment for herself, **BARNES**, and H.M., using a credit card issued for Commission-related business.

d. From in or around September 2015 to in or around September 2018, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** used funds of the Commission to pay approximately \$44,523 for **BARNES'** educational expenses.

e. On or about December 30, 2015, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** traveled with H.M. from St. Croix, VI to Orlando, FL in order to, in part, take a personal trip to Walt Disney World, such trip paid for with a credit card issued for Commission-related business.

f. On or about May 13, 2016, **VIOLET ANNE GOLDEN** purchased three tickets for a total of \$4,935 for seats for a Broadway production of "Hamilton," using a credit card issued for Commission-related business.

g. On or about June 22, 2016, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** traveled with H.M. from St. Croix, VI to St. Kitts to attend the St. Kitts Music Festival, travel paid for with a credit card issued for Commission-related business.

h. On or about July 16, 2016, using a credit card issued for Commission-related business, **VIOLET ANNE GOLDEN** paid \$535 dollars for a limousine ride for **VIOLET ANNE GOLDEN**, **STEPHANIE BARNES**, and H.M. from the Ritz-Carlton Hotel in Westchester, NY to a Broadway production of "Hamilton" in New York, NY.

i. On or about July 11, 2016, **VIOLET ANNE GOLDEN, STEPHANIE BARNES,** and H.M. attended a Broadway production of "Hamilton," the tickets for which were paid with a credit card issued for Commission-related business.

j. Between January 1, 2015 and July 6, 2018, **VIOLET ANNE GOLDEN** caused to be transferred Commission funds to pay down the balances for credit cards that she knew had been used to pay for personal purchases for the benefit of **VIOLET ANNE GOLDEN, STEPHANIE BARNES,** and H.M.

k. Between September 1, 2015 and July 1, 2018, **VIOLET ANNE GOLDEN and STEPHANIE BARNES** caused Commission funds to be paid to **STEPHANIE BARNES** in excess of the amounts due for work performed by Barnes and in the absence of invoices for such work.

l. Between February 24, 2017 and March 1, 2017, **VIOLET ANNE GOLDEN** created false and falsely-dated invoices ("the False Barnes Invoices") for work supposedly performed by Barnes in 2015-2016, in an attempt to justify the Commission funds paid to **STEPHANIE BARNES.**

m. Between February 24, 2017 and March 1, 2017, **STEPHANIE BARNES** provided the False Barnes Invoices to an auditor with the Virgin Islands Inspector General's Office.

All in violation of Title 18, United States Code, Section 371.