

IN THE CIRCUIT COURT OF THE  
SECOND JUDICIAL CIRCUIT, IN AND  
FOR FRANKLIN COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO. 05000148CFMA

vs.

**\*\*INFORMATION\*\***

Pearl I. Westmoreland,  
W/F, DOB: 02/07/1927,

Defendant(s).

---

INFORMATION FOR:

COUNT I: EXPLOITATION OF AN ELDERLY ADULT (F1)(L-8)

COUNT II: MONEY LAUNDERING (F1)(L-9)

COUNT III: AGGRAVATED WHITE COLLAR CRIME (F1)(L-9)

---

IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

WILLIAM N. MEGGS, State Attorney for the Second Judicial Circuit of the State of Florida,  
charges that in Franklin County, the above named defendant(s):

COUNT I: PEARL I. WESTMORELAND, between April 11, 2003 and May 28, 2005, did knowingly, by deception or intimidation, obtain or use, or endeavor to obtain or to use, the funds, assets, or property of WJP\*, an elderly person, with the intent to temporarily or permanently deprive WJP\* of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than WJP\*, in an amount in excess of \$100,000.00, while at the same time standing in a position of trust and confidence with WJP\*, contrary to Section 825.103(2)(a), Florida Statutes.

COUNT II: And PEARL I. WESTMORELAND, between April 11, 2003 and May 28, 2005, did knowingly conduct or attempt to conduct financial transactions in amounts totaling or exceeding \$100,000.00 in a 12 month period, involving property representing the proceeds of specified unlawful activity, to wit: Exploitation Of An Elderly Adult, and the transactions were designed, in whole or in part, to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of such specified unlawful activity, contrary to Section 896.101(5)(c), Florida Statutes.

COUNT III: And PEARL I. WESTMORELAND, between April 11, 2003 and May 28, 2005, did

engage in at least two white collar crimes, to wit: Exploitation of an Elderly Adult, Money Laundering, and Grand Theft, and such crimes had the same or similar intents, or results, or victims, or methods of commission, or are otherwise interrelated by distinguishing characteristics and are not isolated incidents, and in so doing victimized the State of Florida, or any State agency and thereby obtained or attempted to obtain \$50,000.00 or more, contrary to Section 775.0844(5)(c), Florida Statutes.

STATE OF FLORIDA  
COUNTY OF FRANKLIN

WILLIAM N. MEGGS, STATE ATTORNEY  
SECOND JUDICIAL CIRCUIT

---

Michael L. Schneider  
Designated Assistant State Attorney

The foregoing instrument was acknowledged before me on September 1, 2005, by Michael L. Schneider Designated Assistant State Attorney by William N. Meggs, State Attorney for the Second Judicial Circuit of the State of Florida, who is known to me and did take an oath stating good faith in instituting the prosecution and certifying that testimony was received under oath from the material witness or witnesses for the offense pursuant to F.R.Cr.P. 3.140(g).

---

NOTARY PUBLIC

**No Information to Count IV: Public Assistance Fraud**

\* In order to preserve the confidentiality of protected health information, pursuant to HIPPA and Florida Statute Section 409.920(8)(f), the initials of the victim are being used in place of their full name.