IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,) No. 11-000090-01-CR-W-HFS
)
Plaintiff,) COUNT ONE:
) Conspiracy to Defraud the Government
v.) 18 U.S.C. § 286
) NMT: 10 Years Imprisonment
MARIA HARO CAMPOS) NMT: \$250,000 Fine
[DOB: 02/13/1971],) NMT: 3 Years Supervised Release
) Class C Felony
Defendant.)
) \$100 Mandatory Special Assessment
) Order of Restitution

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

From on or about July 1, 2008 until at least on or about April 27, 2009, in the Western District of Missouri and elsewhere, **MARIA HARO CAMPOS** and others, known and unknown to the Grand Jury, knowingly and willfully agreed, combined and conspired with each other to defraud the United States, by obtaining, aiding to obtain, and attempting to obtain, the payment of false and fraudulent claims through the submission of materially false and fraudulent claims to the Internal Revenue Service for income tax refunds. It was part of the conspiracy and in furtherance of it that the defendants employed the following manner and means.

G.P. promoted, including at seminars he sponsored across the country, what he referred to as his "1099 OID Process," which was a fraudulent federal income tax refund scheme.
It was further part of the conspiracy that co-conspirators, who G.P. called his "branch managers," assisted G.P. by locating "clients" to participate in the scheme.
CAMPOS acted as G.P.'s branch manager for Southern California.

3. It was further part of the conspiracy that G.P., CAMPOS and others, known and

unknown to the Grand Jury, assisted the clients in fraudulently filling out their federal income

tax returns. On the returns, the conspirators listed Original Income Discount ("OID") income

that the conspirators knew was never earned by the listed taxpayers. The tax returns also falsely

reflected that most of this OID income had been withheld, which made it appear that the clients

were entitled to substantial tax refunds.

4. It was further part of the conspiracy that **CAMPOS** traveled to Kansas City,

Missouri from California on several occasions to meet with G.P.

5. It was further part of the conspiracy that G.P. charged the clients both an upfront

fee, and a percentage of any proceeds received from fraudulent tax refunds. He shared these

proceeds with the referring branch managers, including CAMPOS.

6. It was further part of the conspiracy that **CAMPOS** arranged multiple phone calls

to promote the scheme.

7. It was further part of the conspiracy that **CAMPOS** introduced at least ten

individuals or married couples to the conspiracy, including J.P. and M.P. Their 2007 income tax

return was filed electronically on October 13, 2008. As a result, J.P. and M.P. received a

fraudulent refund of \$805,749.44 from the United States Treasury. From these proceeds, G.P.

and CAMPOS split \$123,000 in fees. All in violation of 18 U.S.C. § 286.

Beth Phillips

United States Attorney

By /s/ Daniel M. Nelson

Daniel M. Nelson #53885

Assistant United States Attorney

Dated: April 7, 2011

Kansas City, Missouri