

FILED

MAR 28 2012

CLERK, U. S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 3:12-cr-47-J-99ammH-JBT
Ct. 1: 18 U.S.C. § 286

SHATRAYA ANATRICIA WATSON

INDICTMENT

The Grand Jury charges:

COUNT ONE

A. The Agreement

From in or about March, 2006, and continuing through in or about November, 2009, at Jacksonville, in the Middle District of Florida, and elsewhere,

SHATRAYA ANATRICIA WATSON,

defendant herein, knowingly and willfully agreed, combined, and conspired with other individuals, both known and unknown to the Grand jury, to defraud the United States by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims, that is, false, federal income tax refunds, in violation of Title 18, United States Code, Section 287.

B. Manner and Means

1. It was part of the manner and means of the conspiracy that members of the conspiracy would and did obtain stolen identity information such

as names, Social Security numbers and dates of birth, and use and cause to be used that information to prepare and file fraudulent income tax returns which falsely claimed refunds.

2. It was further a part of the manner and means of the conspiracy that fraudulent income tax returns falsely claiming refunds were mailed to the Internal Revenue Service via the United States Postal Service using Priority Mail labels.

3. It was further a part of the manner and means of the conspiracy that SHATRAYA ANATRICIA WATSON allowed one of the other members of the conspiracy to use her residence address as a return address on false income tax returns filed with the Internal Revenue Service (IRS), and to use her apartment as a mail drop to receive mail from IRS (including U.S. Treasury checks).

4. It was further a part of the manner and means of the conspiracy that SHATRAYA ANATRICIA WATSON allowed funds which resulted from tax refunds generated by fraudulent income tax returns to be sent by wire transfer into her personal bank account.

5. It was further a part of the manner and means of the conspiracy that SHATRAYA ANATRICIA WATSON would turn over refund checks and IRS correspondence mailed to her residence to another member of the conspiracy.

All in violation of Title 18, United States Code, Section 286.

A TRUE BILL,



Foreperson

ROBERT E. O'NEILL
United States Attorney

By: 

Kathleen O'Malley
Assistant United States Attorney


By: _____
Mac D. Heavener, III
Assistant United States Attorney
Deputy Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT

Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

SHATRAYA ANATRICIA WATSON

INDICTMENT

Violations:

Count 1: 18 U.S.C. § 286

A true bill,



Foreperson

Filed in open court this 28th day

of March, 2012.



Clerk

Bail \$ _____
