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U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:12-CR-552-T-30 TBW
18 U.S.C. § 371
18 U.S.C. § 1343
18 U.S.C. § 287
18 U.S.C. § 641
18 U.S.C. § 1028A
18 U.S.C. § 981(a)(1)(C) - Forfeiture
28 U.S.C. § 2461(c) - Forfeiture

RASHIA WILSON

and

MAURICE J. LARRY

INDICTMENT

The Grand Jury charges:

COUNT ONE
(CONSPIRACY)

A. The Conspiracy

1. Beginning on an unknown date, but as early as in or about April 2009, and continuing thereafter, through and including at least September 19, 2012, in the Middle District of Florida and elsewhere,

**RASHIA WILSON, and
MAURICE J. LARRY,**

the defendants herein, knowingly and willfully did combine, conspire, confederate and agree, with one another and with others, both known and unknown to the Grand Jury, to commit certain offenses, specifically:

(a) To devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and

fraudulent pretenses, representations, and promises, utilizing transmissions by means of wire and radio communication in interstate and foreign commerce of any writings, signs, signals, and sounds, in violation of Title 18, United States Code, Section 1343;

(b) To make and present, and to cause to be made and presented, to the Internal Revenue Service, an agency of the U.S. Department of the Treasury, claims against the United States for payment, specifically, U.S. Individual Income Tax Returns, which the co-conspirators knew to be false, fictitious, and fraudulent with respect to material facts, in violation of Title 18, United States Code, Section 287; and

(c) To knowingly and willfully steal, embezzle, purloin and convert to their own use and the use of others more than \$1,000 in United States currency with the intent to deprive the owner of the use and benefit of the property so taken, said funds being fraudulently issued tax refunds, which were the property of the United States Treasury, and of the United States of America, in violation of Title 18, United States Code, Section 641.

B. Manner and Means

2. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others:

(a) It was a part of the conspiracy that defendants RASHIA WILSON and MAURICE J. LARRY and others known and unknown to the Grand

Jury would and did use stolen and fraudulently obtained personal identifying information, including names and social security numbers, of individuals to prepare fraudulent U.S. income tax returns using that personal identifying information.

(b) It was further part of the conspiracy that defendants RASHIA WILSON and MAURICE J. LARRY and others known and unknown to the Grand Jury would and did electronically file fraudulent federal income tax returns in order to generate and obtain tax refunds to which they were not entitled.

(c) It was further part of the conspiracy that defendants RASHIA WILSON and MAURICE J. LARRY and others known and unknown to the Grand Jury would and did direct that some of the fraudulently obtained tax refunds be deposited onto reloadable debit cards and that some of them be disbursed as U.S. Treasury Checks.

(d) It was further part of the conspiracy that defendants RASHIA WILSON and MAURICE J. LARRY and others known and unknown to the Grand Jury would and did use the fraudulent tax refunds to obtain cash and goods for their own benefit and the benefit of others.

(e) It was further part of the scheme and artifice to defraud that the defendants would and did misrepresent, conceal, hide, and cause to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and artifice to defraud and the purpose of those acts.

C. Overt Acts

3. In furtherance of and to affect the objectives of the conspiracy, the following overt acts, among others, were committed in the Middle District of Florida, and elsewhere:

(a) On or about the dates set forth below, each of which constitutes a separate overt act, defendants RASHIA WILSON and MAURICE J. LARRY electronically filed fraudulent 2011 U.S. Individual Income Tax Returns using the names set forth below from a hotel located in the Middle District of Florida:

Date	Initials
April 20, 2012	S.W.
April 21, 2012	M.B.
April 23, 2012	M.C.
April 23, 2012	G.T.
April 24, 2012	J.D.

(b) On or about the dates set forth below, each of which constitutes a separate overt act, defendants RASHIA WILSON and MAURICE J. LARRY electronically filed fraudulent 2011 U.S. Individual Income Tax Returns using the names set forth below from WILSON's residence in the Middle District of Florida:

Date	Initials
May 8, 2012	I.Z.
May 8, 2012	J.Z.
May 10, 2012	E.D.

Date	Initials
May 10, 2012	B.D.

(c) On or about the dates set forth below, each of which constitutes a separate overt act, defendants RASHIA WILSON and MAURICE J. LARRY and others known and unknown to the Grand Jury used or attempted to use fraudulent tax refunds for the following purposes in the Middle District of Florida:

Date	Purpose	Source of Funds
April 25, 2012	Charge in the amount of \$976.16 at the Chase Suites Hotel, in Tampa, Florida	Fraudulent tax refund in the name E.N.
May 3, 2012	Withdrawals in the amounts of \$803.00 and \$503.00 from a Fifth Third Bank ATM	Fraudulent tax refund in the name M.C.
May 16, 2012	Charge in the amount of \$1,444.48 at Ashley Furniture, in Brandon, Florida	Fraudulent tax refund in the name K.S.
June 30, 2012	Charge in the amount of \$1,700.00 at Action Promos and Events	Fraudulent tax refunds in the names G.T. and Ma.S.

(d) On or about May 3, 2012, defendant RASHIA WILSON purchased and caused to be purchased a 2013 Audi A8L using a cashier's check for \$92,682.67, which funds were proceeds of fraudulent U.S. Income Tax Returns and refunds.

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

COUNTS TWO THROUGH TEN
(WIRE FRAUD)

A. The Scheme and Artifice

1. Beginning on an unknown date, but as early as in or about April 2009, and continuing thereafter, through and including September 19, 2012, in the Middle District of Florida and elsewhere,

**RASHIA WILSON and
MAURICE J. LARRY,**

the defendants herein, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, utilizing transmissions by means of wire and radio communication in interstate and foreign commerce of any writings, signs, signals and sounds.

B. Manner and Means of the Scheme

2. The Grand Jury hereby realleges Paragraph 2 of Count One of this Indictment and incorporates such paragraph by this reference as though fully set forth herein.

C. Interstate Wire Transmissions

3. On or about the dates listed below, in the Middle District of Florida and elsewhere,

**RASHIA WILSON and
MAURICE J. LARRY,**

the defendants herein, for the purpose of executing the aforementioned scheme and

artifice to defraud and attempting to do so, transmitted and caused to be transmitted by wire in interstate commerce the following electronically filed federal income tax returns:

Count	Victim	Date	From	To
TWO	S.W.	April 20, 2012	Tampa, FL	IRS Service Center, Austin, TX
THREE	M.B.	April 21, 2012	Tampa, FL	IRS Service Center, Austin, TX
FOUR	M.C.	April 23, 2012	Tampa, FL	IRS Service Center, Austin, TX
FIVE	G.T.	April 23, 2012	Tampa, FL	IRS Service Center, Austin, TX
SIX	J.D.	April 24, 2012	Tampa, FL	IRS Service Center, Philadelphia, PA
SEVEN	I.Z.	May 8, 2012	Wimauma, FL	IRS Service Center, Philadelphia, PA
EIGHT	J.Z.	May 8, 2012	Wimauma, FL	IRS Service Center, Philadelphia, PA
NINE	E.D.	May 10, 2012	Wimauma, FL	IRS Service Center, Austin, TX
TEN	B.D.	May 10, 2012	Wimauma, FL	IRS Service Center, Austin, TX

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS ELEVEN AND TWELVE
(FILING FALSE CLAIMS)

On or about the dates listed below, in the Middle District of Florida, and elsewhere,

RASHIA WILSON,

the defendant herein, knowingly made and presented, and caused to be made and presented, to the Internal Revenue Service, an agency of the U.S. Department of the Treasury, claims against the United States for payment, which she knew to be false, fictitious, and fraudulent with respect to material facts, by preparing and causing to be prepared U.S. Individual Income Tax Returns, which were filed with the Internal Revenue Service and claimed refunds on behalf of the individuals named below on the dates indicated below:

Count	Tax Payer	Filing Date	Refund Claimed
ELEVEN	S.M.W.	April 15, 2009	\$7,524.00
TWELVE	J.H.	April 21, 2009	\$7,977.00

All in violation of Title 18, United States Code, Sections 287 and 2.

COUNTS THIRTEEN THROUGH TWENTY-NINE
(FILING FALSE CLAIMS)

On or about the dates listed below, in the Middle District of Florida, and elsewhere,

RASHIA WILSON and
MAURICE J. LARRY,

the defendants herein, knowingly made and presented, and caused to be made and

presented, to the Internal Revenue Service, an agency of the U.S. Department of the Treasury, claims against the United States for payment, which they knew to be false, fictitious, and fraudulent with respect to material facts, by preparing and causing to be prepared U.S. Individual Income Tax Returns, which were filed with the Internal Revenue Service and claimed refunds on behalf of the individuals named below on the dates indicated below:

Count	Tax Payer	Filing Date	Refund Claimed
THIRTEEN	E.N.	April 10, 2012	\$3,500.00
FOURTEEN	S.W.	April 20, 2012	\$9,987.00
FIFTEEN	M.B.	April 21, 2012	\$9,987.00
SIXTEEN	M.C.	April 23, 2012	\$9,987.00
SEVENTEEN	G.T.	April 23, 2012	\$9,987.00
EIGHTEEN	K.S.	April 27, 2012	\$9,987.00
NINETEEN	I.Z.	May 8, 2012	\$3,500.00
TWENTY	J.Z.	May 8, 2012	\$3,500.00
TWENTY-ONE	E.D.	May 10, 2012	\$9,987.00
TWENTY-TWO	B.D.	May 10, 2012	\$9,987.00
TWENTY-THREE	Ma.S.	June 12, 2012	\$6,666.00
TWENTY-FOUR	G.C.	July 17, 2012	\$5,774.00
TWENTY-FIVE	K.W.	July 24, 2012	\$7,497.00
TWENTY-SIX	M.S.	August 17, 2012	\$9,361.00
TWENTY-SEVEN	P.L.	August 17, 2012	\$9,109.00
TWENTY-EIGHT	M.F.	August 20, 2012	\$7,497.00
TWENTY-NINE	B.C.	August 20, 2012	\$7,715.00

All in violation of Title 18, United States Code, Sections 287 and 2.

COUNT THIRTY
(THEFT OF GOVERNMENT PROPERTY)

On or about the dates listed below, in the Middle District of Florida and elsewhere,

RASHIA WILSON,

the defendant herein, did knowingly and willfully steal, embezzle, purloin and convert to her own use and the use of others, more than \$1,000 in United States currency with the intent to deprive the owner of the use and benefit of the property so taken, said funds being tax refunds fraudulently issued in the names of the victim listed below, on the dates listed below, which were the property of the United States Treasury, and of the United States of America:

Count	Tax Payer	Date of Refund	Refund Amount
THIRTY	S.M.W.	April 24, 2009	\$7,524.00

In violation of Title 18, United States Code, Sections 641 and 2.

COUNTS THIRTY-ONE THROUGH FORTY-THREE
(THEFT OF GOVERNMENT PROPERTY)

On or about the dates listed below, in the Middle District of Florida and elsewhere,

RASHIA WILSON and
MAURICE J. LARRY,

the defendants herein, did knowingly and willfully steal, embezzle, purloin and convert to their own use and the use of others, more than \$1,000 in United States currency with the intent to deprive the owner of the use and benefit of the property so taken, said funds being tax refunds fraudulently issued in the names of the victim

listed below, on the dates listed below, which were the property of the United States Treasury, and of the United States of America:

Count	Tax Payer	Date of Refund	Refund Amount
THIRTY-ONE	E.N.	April 18, 2012	\$3,500.00
THIRTY-TWO	S.W.	May 2, 2012	\$4,055.09
THIRTY-THREE	M.B.	May 2, 2012	\$9,987.00
THIRTY-FOUR	M.C.	May 2, 2012	\$9,987.00
THIRTY-FIVE	G.T.	May 2, 2012	\$5,332.93
THIRTY-SIX	K.S.	May 16, 2012	\$9,987.00
THIRTY-SEVEN	Ma.S.	June 27, 2012	\$6,666.00
THIRTY-EIGHT	G.C.	July 25, 2012	\$5,774.00
THIRTY-NINE	K.W.	August 22, 2012	\$7,497.00
FORTY	M.S.	August 27, 2012	\$9,361.00
FORTY-ONE	P.L.	August 29, 2012	\$9,109.00
FORTY-TWO	M.F.	September 14, 2012	\$7,497.00
FORTY-THREE	B.C.	September 14, 2012	\$7,715.00

In violation of Title 18, United States Code, Sections 641 and 2.

COUNT FORTY-FOUR
(AGGRAVATED IDENTITY THEFT)

On or about the dates listed below, in the Middle District of Florida and elsewhere,

RASHIA WILSON,

the defendant herein, did knowingly transfer, possess and use without lawful authority, means of identification of another person, during and in relation to the felony offense of theft of government property, in violation of 18 U.S.C. § 641:

Count	Tax Payer	Date	Description
FORTY-FOUR	S.M.W.	April 24, 2009	Use of victim's name and Social Security Number to file federal income tax return for 2008 tax year

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNTS FORTY-FIVE THROUGH FIFTY-SEVEN
(AGGRAVATED IDENTITY THEFT)

On or about the dates listed below, in the Middle District of Florida and elsewhere,

RASHIA WILSON, and
MAURICE J. LARRY,

the defendants herein, did knowingly transfer, possess and use without lawful authority, means of identification of another person, during and in relation to the felony offense of theft of government property, in violation of 18 U.S.C. § 641:

Count	Tax Payer	Date	Description
FORTY-FIVE	E.N.	April 10, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FORTY-SIX	S.W.	April 20, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FORTY-SEVEN	M.B.	April 21, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FORTY-EIGHT	M.C.	April 23, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FORTY-NINE	G.T.	April 23, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year

Count	Tax Payer	Date	Description
FIFTY	K.S.	April 27, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FIFTY-ONE	Ma.S.	June 12, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FIFTY-TWO	G.C.	July 17, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FIFTY-THREE	K.W.	July 24, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FIFTY-FOUR	M.S.	August 17, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FIFTY-FIVE	P.L.	August 17, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FIFTY-SIX	M.F.	August 20, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year
FIFTY-SEVEN	B.C.	August 20, 2012	Use of victim's name and Social Security Number to file federal income tax return for 2011 tax year

In violation of Title 18, United States Code, Sections 1028A and 2.

FORFEITURE

1. The allegations contained in Counts One through Ten and Thirty through Forty-Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the violations of Title 18, United States Code,

Sections 371 (conspiracy to violate sections 1343 and 641), 1343, and 641 alleged in Counts One through Ten and Thirty through Forty-Three of this Indictment, defendants RASHIA WILSON and MAURICE J. LARRY shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(c) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to those violations.


3. The property to be forfeited includes, but is not limited to a forfeiture money judgment of at least \$1,176,787.00, representing the total amount of proceeds obtained as a result of the violations.

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

- 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 under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,


Foreperson

ROBERT E. O'NEILL
United States Attorney

By:


SARA C. SWEENEY
Assistant United States Attorney

By:


ROBERT A. MOSAKOWSKI
Assistant United States Attorney
Chief, Economic Crimes Section

No. _____

UNITED STATES DISTRICT COURT

Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA
vs.

RASHIA WILSON
and
MAURICE J. LARRY

INDICTMENT

Violations:

Title 18, United States Code, Section 371 - Conspiracy - Count One
Title 18, United States Code, Section 1343 - Wire Fraud - Counts Two through Ten
Title 18, United States Code, Section 287 - Filing False Claims - Counts Eleven through Twenty-Nine
Title 18, United States Code, Section 641 - Theft of Government Property - Counts Thirty through Forty-Three
Title 18, United States Code, Section 1028A - Aggravated Identity Theft - Counts Forty-Four through Fifty Seven

A true bill,



Foreperson

Filed in open court this 18th day

of December, 2012.

Clerk

Bail \$ _____