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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

MONROE DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 3:15-cr-00115-01
	*	
	*	
	*	18 U.S.C. § 1349
VERSUS	*	18 U.S.C. § 1341
	*	18 U.S.C. § 1028A
	*	
	*	DISTRICT JUDGE JAMES
SHANNON A. BRUMFIELD	*	MAGISTRATE JUDGE HAYES

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
18 U.S.C. § 1349
Conspiracy to Commit Mail Fraud

AT ALL TIMES RELEVANT HEREIN:

I. BACKGROUND

A. The Defendant, SHANNON A. BRUMFIELD, was employed as a Lieutenant with the Hinds County Sheriff's Department and assigned to the Hinds County Detention Center in Raymond, Mississippi.

B. The Jail Management System (JMS) is an electronic database utilized by the Hinds County Sheriff's Department. JMS maintains identification information for past and current inmates as well as the personal identifiers of individuals who were fingerprinted by the Hinds County Sheriff's Office for background checks.

C. The Internal Revenue Service (IRS) is an agency of the United States Department of the Treasury responsible for enforcing and administering the tax laws of the United States, and collecting taxes owed to the United States.

II. THE CONSPIRACY

Beginning on or about the 1st day of May, 2011, and continuing until on or about the 31st day of December, 2012, in the Western District of Louisiana and elsewhere, the Defendant, SHANNON BRUMFIELD, and others both known and unknown to the Grand Jury, did knowingly combine, conspire, and agree together to violate Title 18, United States Code, Section 1341, namely, to knowingly devise and intend to devise and participate in a scheme and artifice to defraud the United States and to obtain from the United States money and property by means of false and fraudulent pretenses, representations, and promises.

III. THE OBJECT OF THE CONSPIRACY

The object of the conspiracy and the scheme and artifice to defraud was to obtain IRS tax refunds to which the conspirators were not entitled.

IV. MANNER AND MEANS OF THE CONSPIRACY

The defendant, SHANNON A. BRUMFIELD, and others, engaged in numerous activities to accomplish the object of the conspiracy and the scheme and artifice to defraud, such activities included, but were not limited to:

A. It was part of the conspiracy and the scheme and artifice to defraud that SHANNON A. BRUMFIELD used her position at the Hinds County Detention Center

to access the Hind's County JMS and steal the personal identifiers of various individuals.

B. It was further a part of the conspiracy and the scheme and artifice to defraud that SHANNON A. BRUMFIELD electronically submitted or caused to be electronically submitted federal income tax returns using names and social security numbers which had been stolen from JMS and other places. Based on these fraudulent returns, the Internal Revenue Service issued refunds by mailing United States Treasury checks to United States Post Office boxes in Tallulah, Louisiana.

C. It was further a part of the conspiracy and the scheme and artifice to defraud that other persons known and unknown opened the post office boxes referenced in Paragraph B, retrieved the Treasury checks, and cashed the Treasury checks.

D. It was further part of the conspiracy and the scheme and artifice to defraud that SHANNON A. BRUMFIELD and other persons known and unknown to the Grand Jury divided up among themselves the proceeds of the Treasury checks referenced in Paragraph C.

All in violation of Title 18, United States Code, Section 1349. [18 U.S.C. § 1349]

COUNTS 2 - 12
18 U.S.C. § 1341
Mail Fraud

1. The allegations in Count 1 are incorporated by reference as though fully set forth herein as the scheme and artifice to defraud.

2. On or about the dates set forth below, in the Western District of Louisiana and elsewhere, the Defendant SHANNON A. BRUMFIELD and others known and unknown to the Grand Jury, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, did knowingly cause to be placed in an authorized depository of mail matter, to be sent, delivered, and moved by the United States Postal Service, according to the directions thereon, to a post office box in Tallulah, Louisiana, a tax refund check payable to the person named below,

COUNT	DATE	TAX YEAR	TAXPAYER
2	04/04/12	2011	AB
3	04/09/12	2011	TC
4	06/22/12	2011	SD
5	07/04/12	2011	WH
6	08/08/12	2011	DD
7	08/07/12	2011	KK
8	10/11/12	2010	MP
9	10/11/12	2010	JK
10	10/13/12	2011	AN
11	10/14/12	2011	LM
12	10/24/12	2010	KK

all in violation of Title 18, United States Code, Section 1341 [18 U.S.C. § 1341].

COUNTS 13 - 22
18 U.S.C. § 1028A(a)(1)
Aggravated Identity Theft

I. The allegations of Counts 1 through 12 are realleged and incorporated as though set forth in full herein.

II. THE OFFENSE

On or about the dates set forth below, in the Western District of Louisiana and elsewhere, the Defendant, SHANNON A. BRUMFIELD, did knowingly transfer, possess and use, and cause to be transferred, possessed and used, without lawful authority, a means of identification of another person during and in relation to an enumerated felony, that is mail fraud, in violation of Title 18, United States Code, Section 1341 [18 U.S.C. § 1341], in that the Defendant, SHANNON A. BRUMFIELD, did use the name and social security number of the person set forth below, in order to defraud the Internal Revenue Service,

COUNT	DATE	TAX YEAR	TAXPAYER
13	04/04/12	2011	AB
14	04/09/12	2011	TC
15	06/22/12	2011	SD
16	07/04/12	2011	WH
17	08/08/12	2011	DD
18	08/07/12	2011	KK
19	10/11/12	2010	MP
20	10/11/12	2010	JK
21	10/13/12	2011	AN
22	10/14/12	2011	LM

all in violation of Title 18 U.S.C. Section 1028A(a)(1) [18 U.S.C. § 1028A(a)(1)].

NOTICE OF FORFEITURE

1. The allegations contained in Counts 1 - 22 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant

to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1341 set forth in Counts 2 - 12 of this Indictment or upon a conviction of a conspiracy to violate Section 1341 as set forth in Count 1, in violation of Title 18, United States Code, Section 1349, the defendant, SHANNON A. BRUMFIELD, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 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 the offense(s). The property to be forfeited includes, but is not limited to, the following:

> **Real property and located at 450 Lake Dockery Drive, Byram, Mississippi, including all improvements thereon and appurtenances thereto, and described as follows:**
>
> **LOT 36, Lake Dockery Estates Subdivision, PART 3, a subdivision according to a map or plat thereof which is on file and of record in the office of the Chancery Clerk of Hinds County, in Jackson, Mississippi in Plat 40 at Page 2, reference to which is hereby made in aid of and as a part of this description.**

3. 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,

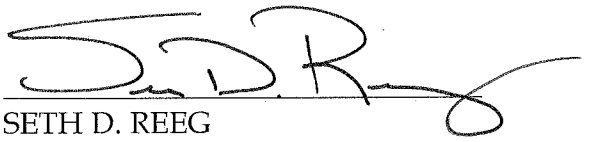
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

A TRUE BILL

GRAND JURY FOREPERSON

STEPHANIE A. FINLEY
United States Attorney



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