

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 286 - Conspiracy to File False Claims

E-filing

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

18 U.S.C. § 286 - 10 years prison, \$250,000 fine, 3 years supervised release, \$100 assessment

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

MELINDA HAAG U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) THOMAS NEWMAN, AUSA, TAX DIV.

Name of District Court, and/or Judge/Magistrate Location NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

DEFENDANT - U.S.

CHARLESZETTA BROWN, aka CANDICE TRAYLOR

DISTRICT COURT NUMBER

CR 12 0267

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
5) On another conviction
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount:

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

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Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S. **CLEXTON WARD**

DISTRICT COURT NUMBER
CR 12 0267 EMC

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction
 - 6) Awaiting trial on other charges
- } Fed'l State
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST _____
Month/Day/Year

Or... if Arresting Agency & Warrant were not _____
Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY _____

This report amends AO 257 previously submitted

PROCEEDING

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MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM
MELINDA HAAG

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) THOMAS NEWMAN, AUSA, TAX DIV.

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If Summons, complete following:

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Defendant Address: _____

**Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment*

Date/Time: _____

Before Judge: _____

Comments:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

E-filing

VENUE: SAN FRANCISCO

CR 12 0267

FILED
2012 APR 17 P 3:30
RICHARD WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

v.

EMC

CHARLESZETTA BROWN, aka
CANDICE TAYLOR, and
CLEXTON WARD,

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 286 - Conspiracy to File False Claims

A true bill.

[Signature]

Foreman

Filed in open court this 17th day of

April, 2012

[Signature]

Clerk

Bail, \$ _____

[Signature]

*Brown: No bail warrant
Ward: No bail warrant*

MELINDA HAAG (CABN 132612)
United States Attorney

E-filing

FILED
2012 APR 17 P 3:30
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CR 12 0267

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHARLESZETTA BROWN, aka
CANDICE TAYLOR, and
CLEXTON WARD,
Defendants.

VIOLATION: 18 U.S.C. § 286 - Conspiracy
to File False Claims

SAN FRANCISCO VENUE

EMC

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 286 - Conspiracy to File False Claims)

1. Beginning in or about June 2008, and continuing until in or about February 2009,
within the Northern District of California and elsewhere, the defendants

CHARLESZETTA BROWN aka CANDICE TAYLOR, and
CLEXTON WARD,

and others, both known and unknown to the grand jury, entered into an agreement, combination
and conspiracy with others and each other to defraud the Internal Revenue Service ("IRS"), an
agency of the United States, by obtaining and aiding to obtain the payment and allowance of
false, fictitious, and fraudulent claims.

INDICTMENT
CR-12-

MANNER AND MEANS OF THE CONSPIRACY

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2. CHARLESZETTA BROWN (BROWN), CLEXTON WARD (WARD), and others, both known and unknown to the Grand Jury, filed, or helped others file, false claims with the IRS requesting refunds in their own names or in the names of others.

3. BROWN, WARD, or their co-conspirators procured the names and identities of individual taxpayers, through illegal means or by agreement with participants in the scheme.

4. BROWN, WARD, or their co-conspirators electronically filed with the IRS, or assisted in filing with the IRS, false federal income tax returns for these taxpayers.

5. The false federal income tax returns filed by BROWN, WARD, or their co-conspirators requested refunds from the IRS to which the taxpayers listed on the federal income tax returns were not entitled.

6. As part of the scheme, BROWN, WARD, or their co-conspirators opened personal bank accounts, and solicited personal bank account information from others. BROWN, WARD, and their co-conspirators reported, or assisted in reporting, this personal bank account information on the fraudulent federal income tax returns as the bank account into which the fraudulent refunds from the IRS were to be deposited.

7. After a fraudulent refund was deposited into one of these accounts, BROWN, WARD, and their co-conspirators agreed to divide the proceeds from the fraudulent refund among themselves.

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

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Dated: April 17, 2012

A True Bill
John M. ...
FOREPERSON

MELINDA HAAG
United States Attorney

J. Song Cas W. ...
MIRANDA KANE
Chief, Criminal Division

Approved as to Form
M. J. Kluge
MATTHEW J. KLUGE
Trial Attorney
THOMAS M. NEWMAN
Assistant United States Attorney
Tax Division