

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ZORANA THERESA CHARLESTON-
BLACK, also known as "T"

UNDER SEAL

Violations: Title 18, United States
Code, Sections 287, 641, and
1028A(a)(1)

COUNTS ONE THROUGH TWENTY

The SPECIAL SEPTEMBER 2011 GRAND JURY charges:

1. At times material to this indictment:

(a) The Internal Revenue Service provided that taxpayers who were entitled to a refund of federal individual income taxes could claim that refund either by signing and filing in person or by mailing a United States Individual Income Tax Return Form 1040, 1040A, 1040EZ, or by participating in the "Electronic Filing" program.

(b) Form 1040 required taxpayers to provide information that included, but was not limited to, the taxpayer's name and address, social security number, number of dependents, total income for the tax year, the amount of federal income tax withheld during the tax year, the amount of federal income tax, and the amount of tax due or refund claimed.

(c) Subject to certain conditions, taxpayers were permitted to deduct from their taxable income certain of their expenses, including but not limited to expenses related to medical treatment; interest paid on home mortgage loans;

charitable deductions; state and local taxes; unreimbursed business expenses; withheld federal income, social security, and Medicare taxes; and deductions for dependents.

(d) Income or loss from a business a taxpayer operated or a profession the taxpayer practiced as a sole proprietor was required to be set forth in a Schedule C, an attachment to the taxpayer's Form 1040. The IRS used the information contained on the Schedule C, along with other provided information, to determine the amount of the taxpayer's federal income tax and the amount of tax or refund due, if any.

(e) Every employer engaged in a trade or business who paid remuneration for services provided by an employee, if that employee was a person from whom income, social security, or Medicare tax was withheld, was required to file with the government and provide to each employee a copy of a Wage and Tax Statement, referred to as a Form W2 or, more simply, a W2. Each W2 would include the total compensation provided to the employee for the tax year, along with the amounts withheld for federal income tax, social security tax, and Medicare tax. The IRS used the information contained on the W2, along with other provided information, to determine the amount of the taxpayer's federal income tax and the amount of tax or refund due, if any.

(f) The IRS relied upon information from the Form 1040, including, but not limited to, the Schedule C and W2, in determining and issuing taxpayer refunds. After receiving this information, the IRS issued a refund to the taxpayer if there were no outstanding tax liabilities or other federally authorized deductions on record with the IRS.

(g) Taxpayers entitled to a refund could request that the Department of the Treasury issue the refund in one of several ways, including: (i) by United States Savings Bonds or paper check mailed to the taxpayer's address listed on the Form 1040; (ii) by direct deposit into a financial institution account identified by the taxpayer on the Form 1040; or (iii) the balance could be applied to the following year's income tax.

2. Taxpayers A through R were actual persons residing in the State of Illinois.

3. For tax years 2005 through 2008, defendant ZORANA CHARLESTON-BLACK caused to be prepared and filed approximately 293 federal income tax returns. These returns claimed approximately \$1,313,835 due in refunds, for which the IRS issued refunds totaling approximately \$403,697. No fewer than 200 of these returns included false, fictitious, and fraudulent information in either a Schedule C or W2, including but not limited to false wages and income tax withholding and false business income and expenses. Each of the returns that included false, fictitious, and fraudulent information claimed a tax refund to which the listed taxpayer was not entitled.

4. On or about the dates set forth below, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ZORANA THERESA CHARLESTON-BLACK,
also known as "T",

defendant herein, made and presented and caused to be presented to the Internal Revenue Service, an agency of the Department of the Treasury, a claim upon and

against the United States, namely, an individual income tax return as set forth below, each such filing constituting a separate count of this indictment, and each return claiming a federal income tax refund in the amount set forth below, knowing that such claim was false, fictitious, and fraudulent:

Count	Date Filed	Taxpayer	Tax Year	Refund Claimed
1	January 12, 2007	Taxpayer A	Tax Year 2006	\$5,361
2	January 16, 2007	Taxpayer B	Tax Year 2006	\$5,291
3	April 17, 2007	Taxpayer C	Tax Year 2006	\$2,454
4	May 31, 2007	Taxpayer D	Tax Year 2006	\$7,294
5	June 4, 2007	Taxpayer E	Tax Year 2006	\$11,205
6	June 6, 2007	Taxpayer F	Tax Year 2006	\$12,389
7	June 7, 2007	Taxpayer G	Tax Year 2006	\$9,500
8	June 7, 2007	Taxpayer H	Tax Year 2006	\$11,717
9	June 8, 2007	Taxpayer I	Tax Year 2006	\$9,985
10	June 14, 2007	Taxpayer J	Tax Year 2006	\$9,025
11	June 18, 2007	Taxpayer K	Tax Year 2006	\$10,859
12	June 20, 2007	Taxpayer L	Tax Year 2006	\$7,000
13	June 28, 2007	Taxpayer M	Tax Year 2006	\$9,935
14	June 28, 2007	Taxpayer N	Tax Year 2006	\$9,305
15	July 2, 2007	Taxpayer O	Tax Year 2006	\$9,305
16	July 16, 2007	Taxpayer P	Tax Year 2006	\$8,612
17	January 22, 2008	Taxpayer P	Tax Year 2007	\$2,483
18	July 12, 2007	Taxpayer Q	Tax Year 2006	\$9,584
19	May 19, 2008	Taxpayer Q	Tax Year 2007	\$5,257
20	January 15, 2008	Taxpayer R	Tax Year 2007	\$2,483

In violation of Title 18, United States Code, Section 287.

COUNT TWENTY-ONE

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

Beginning on or about April 3, 2008, and continuing until on or about December 3, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ZORANA THERESA CHARLESTON-BLACK,
also known as "T",

defendant herein, did steal, purloin, and knowingly convert to her own use money of the United States, namely, approximately \$26,246 in funds administered by the Social Security Administration as part of its Retirement and Survivors Insurance Benefits program, which funds defendant was not entitled to receive;

In violation of Title 18, United States Code, Section 641.

COUNT TWENTY-TWO

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

Beginning on or about April 3, 2008, and continuing until on or about December 3, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ZORANA THERESA CHARLESTON-BLACK,
also known as "T",

defendant herein, during and in relation to the commission of a felony, namely, theft, as charged in Count Twenty-One of this Indictment, knowingly possessed and used, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security account number of Individual A;

In violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

The SPECIAL SEPTEMBER 2011 GRAND JURY further alleges:

1. The allegations contained in Count Twenty-One of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of her violation of Title 18, United States Code, Section 641, as alleged in Count Twenty-One of this Indictment,

ZORANA THERESA CHARLESTON-BLACK,
also known as "T",

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest she may have in any property, real and personal, which constitutes or is derived from proceeds traceable, directly or indirectly, to a violation of Title 18, United States Code, Section 641.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), include but are not limited to approximately \$26,246.

4. If any of the property subject to forfeiture and 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 subdivided 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);

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY