

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 12-  
 :  
 v. : 18 U.S.C. §§ 286, 641 and 2  
 :  
 PATRICIAH OMARI :  
 : I N D I C T M E N T

The Grand Jury, in and for the District of New Jersey,  
sitting in Newark, charges:

COUNT ONE  
(Conspiracy to File False Claims)

1. At all times relevant to this Indictment:
  - a. Defendant Patriciah Omari was a resident of Middlesex County, New Jersey.
    - a. The Department of the Treasury, Internal Revenue Service was an agency of the United States responsible for the processing of individual income tax returns and collecting income tax payable to the United States.

The Conspiracy

2. From at least as early as in or about April 2010 through in or about June 2010, in the District of New Jersey, and elsewhere, defendant

PATRICIAH OMARI  
did knowingly and intentionally enter into an agreement, combination and conspiracy with other persons to defraud the

United States and a department or agency thereof, namely the United States Department of the Treasury, Internal Revenue Service ("IRS"), by obtaining and aiding to obtain the payment and allowance of a false, fictitious and fraudulent claim, namely an individual income tax refund.

Object of the Conspiracy

3. The object of the conspiracy was for defendant Patriciah Omari and her co-conspirators to obtain income tax refunds that were generated through the filing of a materially false and fraudulent income tax return with the IRS, and to use the illicit cash proceeds - totaling in excess of \$72,000 - for their personal benefit.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that beginning at least as early as in or about April 2010 through in or about June 2010, defendant Patriciah Omari and her co-conspirators prepared at least one false United States Individual Income Tax Return in the name of another person for tax year 2009, which included the following false information and documents:

- a. False address, which did not correspond with the actual address of the person whose name and social security number was used on the fraudulent return;
- b. False statement concerning income;

- c. False W-2 Form from an employer who did not employ the person whose name was used to file the fraudulent return;
- d. False information about income tax purportedly withheld from income; and
- e. False claim for a refund.

5. It was further part of the conspiracy that, thereafter, Omari and her co-conspirators mailed the false return and supporting documentation to an IRS service center.

6. It was further part of the conspiracy that the false tax return filed by Omari and her co-conspirators claimed a \$72,859 tax refund. As a result of this return and claimed refund, the IRS processed the false return as if it were legitimate, and the IRS issued an actual refund in the amount of approximately \$72,859.

7. It was further part of the conspiracy that defendant Patriciah Omari and her co-conspirators provided the routing number and bank account information of a Bank of America savings account held solely in the name of and under the custody and control of Omari on the false return, which caused the IRS to deposit the refund into that bank account. The proceeds were thereafter withdrawn.

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

COUNT TWO

(Stealing Public Money, Property and Records)

1. Paragraphs 1 and 3 through 7 of Count One of this Indictment are realleged and incorporated as if set forth herein.

2. From at least as early as in or about April 2010 through in or about June 2010, in the District of New Jersey and elsewhere, defendant

PATRICIAH OMARI

did knowingly embezzle, steal, purloin, and convert to her use and the use of others, money and things of value to which she was not entitled, namely an income tax refund in the approximate amount of \$72,859, of the United States and of a department or agency thereof, namely the Department of the Treasury, Internal Revenue Service, and did receive, conceal and retain the same with intent to convert it to her use or gain, knowing it to have been embezzled, stolen, purloined or converted

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

FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of Count Two of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendant that, upon conviction of the offense charged in Count Two of this Indictment, the government will seek forfeiture, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 641, alleged in Count Two of this Indictment.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

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 will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

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FOREPERSON



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PAUL J. FISHMAN  
United States Attorney

CASE NUMBER:

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

PATRICIAH B. OMARI

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INDICTMENT FOR

18 U.S.C. §§ 286, 641, and 2

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A True Bill,

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Foreperson

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PAUL J. FISHMAN

U. S. ATTORNEY

NEWARK, NEW JERSEY

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JACQUES S. PIERRE

ASSISTANT U. S. ATTORNEY

973-645-2716

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