

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA

v.

**RHASHEMA DERAMUS,
a/k/a Rhashema Shackelford**

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CR. NO. 2:11-cr-198-MEF

MOTION TO AMEND

Comes now the United States of America, by and through George L. Beck, Jr., United States Attorney for the Middle District of Alabama, and respectfully moves this Court to amend Document 18, an Order issued by this Court in response to the Government's Motion By United States On Procedure To Provide Victim Notice ("Motion") (Doc. 17).

As grounds for this motion, the Government asserts that, its Motion contained ads it intended to run in various newspapers in an attempt to notify unidentified victims in this case. This Court granted the Government's Motion (Doc. 18) and those ads were run in the various newspapers this week. Following the publication of the ads, the Government was informed that the contact phone number listed in the ads is incorrect. The Government moves this Honorable Court to order it to publish the ads containing the correct phone number.

The United States intends to publish the following notice in the legal notices sections of the Dothan Eagle and the Troy Messenger:

ATTENTION: FORMER PATIENTS OF TROY HOSPITAL: The United States Attorney's Office is currently prosecuting cases which allege, among other things, theft of personal identifying information of former patients of Troy Hospital and the use of that information to prepare fraudulent tax returns. These alleged thefts of that information occurred between January 17, 2011 and March 25, 2011. If you feel that you may be a victim of these alleged crimes and would like to obtain current information about these cases, please call the toll-free

Victim Hotline at 1-866-699-0840 or visit our website at www.justice.gov/usao/alm/. An indictment is merely an accusation. A defendant is presumed innocent unless and until proven guilty.

The United States intends to publish the following notice in the legal notices section of the Montgomery Advertiser:

ATTENTION: CLIENTS OF THE STATE OF ALABAMA DEPARTMENT OF HUMAN RESOURCES, FORMER PATIENTS OF JACKSON HOSPITAL, EMPLOYEES OF VINSON GUARD SERVICE, INC., AND PARENTS OF STUDENTS IN JEFFERSON DAVIS HIGH SCHOOL DURING THE 2009-2010 SCHOOL YEAR: The United States Attorney's Office is currently prosecuting cases which allege, among other things, theft of personal identifying information of clients of the State of Alabama Department of Human Resources, former patients of Jackson Hospital, employees of Vinson Guard Service, Inc., and students who attended Jefferson Davis High School during the 2009-2010 school year and the use of that personal identifying information to prepare fraudulent tax returns. These alleged thefts of that information occurred between January 1, 2009 and March 25, 2011. If you feel that you may be a victim of these alleged crimes and would like to obtain current information about this case, please call the toll-free Victim Hotline at 1-866-699-0840 or visit our website at www.justice.gov/usao/alm/. An indictment is merely an accusation. A defendant is presumed innocent unless and until proven guilty.

The United States intends to publish the following notice in the legal notices section of the Champion, which is published in DeKalb County, Georgia:

ATTENTION: FORMER PATIENTS OF DEKALB MEDICAL CENTER: The United States Attorney's Office for the Middle District of Alabama is currently prosecuting cases which allege, among other things, theft of personal identifying information of former patients of the DeKalb Medical Center and the use of that information to prepare fraudulent tax returns. The theft of that information allegedly occurred between January 1, 2009 and March 25, 2011. If you feel that you may be a victim of these alleged crimes and would like to obtain current information about this case, please call the toll-free Victim Hotline at 1-866-699-0840 or visit our website at www.justice.gov/usao/alm/. An indictment is merely an accusation. A defendant is presumed innocent unless and until proven guilty.

The Government intends to publish each notice for one day, preferably during the week of April 1, 2012. Upon receiving the Court's order authorizing this procedure, contact with the publishers will be made for publication of the notice.

Premises considered, the United States respectfully moves that this Court enter an order requiring and allowing individual notice and notice by publication as requested and moved in this motion. The United States has included a proposed order as Attachment A to this motion.

Respectfully submitted this the 23rd day of March, 2012,

GEORGE L. BECK, JR.
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2012, I electronically filed the foregoing with the Clerk of Court, using the CM/ECF system, which will send notification of such filing to all attorneys of record.

GEORGE L. BECK, JR.
UNITED STATES ATTORNEY

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