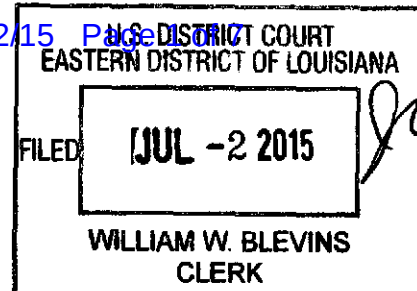


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA



UNITED STATES OF AMERICA * CRIMINAL NO. 15-94
v. * SECTION: "A"
ANGELA CHANEY * MAGISTRATE: 1

* * *

FACTUAL BASIS

The defendant, **ANGELA CHANEY**, (hereinafter "**CHANEY**") has agreed to plead guilty as charged to Count One, that is, conspiracy to defraud the United States and to commit mail fraud and theft of public money, in violation of Title 18, United States Code, Section 371, and Count Twenty-Three, that is, aggravated identity theft, in violation of Title 18, United States Code, Section 1028A.

This Factual Basis does not attempt to set forth all of the facts known to the United States at this time. The limited purpose of this Factual Basis is to demonstrate that there exists a sufficient legal basis for **CHANEY**'s guilty plea. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea that the defendant will tender pursuant to the plea agreement. The parties also agree that this Factual Basis may, but need not, be used by the United States Probation Office and the Court in determining the applicable advisory guideline range under the United States Sentencing Guidelines or the appropriate sentence under 18 U.S.C. § 3553(a). The defendant agrees not to object to any fact set forth below being used by the Court or the United States Probation Office to determine the applicable advisory guideline range or the appropriate sentence under 18 U.S.C. § 3553(a). The parties' agreement does not preclude either party from hereafter presenting the Court with additional facts which do not contradict facts to

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which the parties have agreed not to object and which are relevant to the Court's guideline computations, to the 18 U.S.C. § 3553 factors, or to the Court's overall sentencing decision.

The United States and **CHANEY** do hereby stipulate and agree that the allegations in the indictment and the following facts are true and correct and that, should this matter have proceeded to trial, the government would have proven them beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible and documentary exhibits.

At all times material to the indictment, defendant **CHANEY** resided in Tangipahoa Parish, which is within the Eastern District of Louisiana.

At all times material to the indictment, the Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the United States.

At all times material to the indictment, a "means of identification" was any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a name, signature, Social Security number, or date of birth.

At all times material to the indictment, a check casher was a person that accepted checks in return for currency or a combination of currency and other monetary instruments, in an amount greater than \$1,000 for any person on any day in one or more transactions.

Beginning in approximately 2002 and continuing through at least April 10, 2015, in the Eastern District of Louisiana and elsewhere, defendants **COREY LEWIS**, **ANGELA CHANEY**, **THADDEUS RICHARDSON**, **CEDRICK MITCHELL**, **CRAIG LEWIS**, **BRAD LEWIS**, **MARTIN JACKSON, SR.**, and others, unlawfully, voluntarily, intentionally, and knowingly did conspire, combine, confederate, and agree together and with each other:

- a. to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS in the ascertainment, computation, assessment, and collection of federal income taxes; and
- b. to commit offenses against the United States, to wit, mail fraud, in violation of Title 18, United States Code, Section 1341, and theft of public money, in violation of Title 18, United States Code, Section 641.

Defendant **CHANEY** and others devised and intended to devise a scheme to defraud and to obtain money and property by means of false pretenses, promises, and representations. It was part of the scheme to defraud that defendant **CHANEY** and others would and did obtain the means of identification of individuals, including their names and Social Security numbers.

It was further part of the scheme to defraud that defendant **CHANEY**, COREY LEWIS, CRAIG LEWIS, BRAD LEWIS, CEDRICK MITCHELL, and others would and did use these means of identification to prepare and file false federal income tax returns that fraudulently claimed large refunds.

It was further part of the scheme to defraud that defendant **CHANEY**, COREY LEWIS, CRAIG LEWIS, BRAD LEWIS, CEDRICK MITCHELL, and others would and did direct that refunds anticipated from false federal income tax returns be paid via U.S. Treasury check and mailed to addresses in Louisiana.

It was further part of the scheme to defraud that defendant **CHANEY**, COREY LEWIS, CRAIG LEWIS, BRAD LEWIS, CEDRICK MITCHELL, and others would and did cause Post Office Boxes to be opened and used to receive fraudulent tax refund checks.

It was further part of the scheme to defraud that defendant **CHANEY**, COREY LEWIS, CRAIG LEWIS, BRAD LEWIS, CEDRICK MITCHELL, and others would and did falsely endorse, and cause to be falsely endorsed, fraudulently obtained U.S. Treasury checks.

It was further part of the scheme to defraud that defendant **CHANEY**, COREY LEWIS, CRAIG LEWIS, BRAD LEWIS, CEDRICK MITCHELL, THADDEUS RICHARDSON, MARTIN JACKSON, SR. and others would and did cause fraudulently obtained U.S. Treasury checks to be converted to cash, including by depositing the checks into bank accounts; withdrawing the funds in cash; and writing checks payable to cash or to other members of the conspiracy.

Defendant **CHANEY** brought, or caused to be brought, fraudulently obtained tax refund checks to defendants THADDEUS RICHARDSON and MARTIN JACKSON, SR., often at their respective business locations. Defendants THADDEUS RICHARDSON and MARTIN JACKSON, SR. each agreed with defendant **CHANEY** to convert the fraudulent tax refund checks into cash, less a fee that they charged for cashing the checks. The fees were typically negotiated at each transaction and represented a portion of the checks' face value. Defendant THADDEUS RICHARDSON provided defendant **CHANEY** with her portion of the fraud proceeds in cash or in the form of business checks drawn on RICHARDSON's business bank account, which defendant **CHANEY** then cashed. Defendant MARTIN JACKSON, SR. provided **CHANEY** with her portion of the fraud proceeds in cash.

It was further part of the scheme to defraud that defendant **CHANEY**, COREY LEWIS, ANGELA CHANEY, BRAD LEWIS, CEDRICK MITCHELL, and others would and did conduct financial transactions involving funds derived from fraudulent income tax refunds, including by negotiating checks provided to them by defendant THADDEUS RICHARDSON.

On or about the dates listed below, defendant **CHANEY** opened the following Post Office Boxes and later caused them to be used in furtherance of the conspiracy:

Date Opened	Post Office Box	Post Office Box Holder
03/28/2003	P.O. Box 742, Hammond, LA	ANGELA CHANEY
02/26/2008	P.O. Box 664, Natalbany, LA	ANGELA CHANEY

07/28/2009	P.O. Box 4033, Hammond, LA	ANGELA CHANEY
12/28/2009	P.O. Box 832, Hammond, LA	ANGELA CHANEY
12/28/2009	P.O. Box 1323, Natalbany, LA	ANGELA CHANEY

On or about the dates listed below, defendant **CHANEY** and others caused to be filed with the IRS via U.S. Mail the following false federal income tax returns, identified by the taxpayer initials and home address listed on the returns:

Date Mailed	Taxpayer	Tax Year	Address
04/08/2010	D.G.	2008	P.O. Box 742, Hammond, LA
04/10/2010	M.F.	2008	P.O. Box 2306, Hammond, LA
09/09/2011	K.R.	2010	P.O. Box 4033, Hammond, LA

On or about June 15, 2010, defendant **CHANEY** caused money of the United States, to wit, a federal income tax refund in the form of U.S. Treasury check #***1914 in the amount of \$4845.72 and made payable to M.F., to be deposited into a bank account under her control, which money she knew she was not entitled to receive.

On or about the dates listed below, defendant **CHANEY** and others conducted, among others, the following financial transactions:

Date of Transaction	Description of Transaction
04/19/2011	Defendant THADDEUS RICHARDSON wrote business check #1252 in the amount of \$4821.00 payable to ANGELA CHANEY.
04/19/2011	Defendant ANGELA CHANEY cashed business check #1252 in the amount of \$4821.00 payable to ANGELA CHANEY.

On or about the date listed below, in the Eastern District of Louisiana and elsewhere, defendant **CHANEY** and others, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, knowingly caused to be delivered by mail according to the direction thereon the following matters:

Date	Description
04/10/2010	A 2008 Form 1040 bearing the name M.F. and Post Office Box 2306, Hammond, LA, mailed to the IRS.
06/11/2010	U.S. Treasury check #***1914 payable to M.F. mailed to P.O. Box 2306,

	Hammond, LA.
09/09/2011	A 2010 Form 1040 bearing the name K.R. and Post Office Box 4033, Hammond, Louisiana, mailed to the IRS.
10/07/2011	U.S. Treasury check #***4321 payable to K.R. mailed to P.O. 4033, Hammond, LA.
10/21/2011	U.S. Treasury check #***2292 payable to K.R. mailed to P.O. 4033, Hammond, LA.
12/23/2011	U.S. Treasury check #***2222 payable to K.R. mailed to P.O. 4033, Hammond, LA.

On or about April 10, 2010, defendant **CHANEY** did knowingly transfer, possess, and use, in the Eastern District of Louisiana, the means of identification of another person, without lawful authority, during and in relation to the offense of mail fraud, in violation of 18 U.S.C. § 1341, knowing that the means of identification belonged to actual person, identified by the initial M.F.

The parties agree to recommend to the Court that the loss amount attributable to **CHANEY's** participation in Count One, based on the information known to the Government as of June 3, 2015, is greater than \$400,000 and less than \$1,000,000. There are no other agreements among the parties regarding sentencing factors in this case.

Various records, including income tax returns, IRS filing records, bank records, audio and video recordings, and documents and tangible objects would be introduced at trial to prove the facts as set forth above. In addition, the testimony of employees and agents of the Internal Revenue Service, and other competent witnesses would be introduced at trial to prove the facts set forth above.

APPROVED AND AGREED TO:

Dall Kammer by: Hayden Proctor
G. DALL KAMMER
Assistant United States Attorney

Date 7/2/15

Marion B. Farmer
MARION FARMER, Esq.
Bar Roll No.
Attorney for Defendant CHANEY

Date July 2, 2015

ANGELA CHANEY
Defendant

Date _____