

JUDGE KAPALA
MAGISTRATE JUDGE JUANSTON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
)
 v.)
)
 SHAMEKA CARR)

No. 16 CR 50009
Violations: Title 18, United States Code,
Sections 1341, 1028A and
1029

COUNTS ONE THROUGH SIX
(Mail Fraud)

The NOVEMBER 2015 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant SHAMEKA CARR resided in Poplar Grove, Illinois, within the Northern District of Illinois.

b. 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, Social Security number, date of birth, or an access device.

c. A "prepaid debit card" was a card linked to an account at a financial institution, which could be used to receive deposits electronically, like a traditional bank account, and to make purchases and cash withdrawals with funds in the account, like a traditional debit card.

d. The Internal Revenue Service was an agency of the United States Department of the Treasury and, among other things, was responsible for administering the tax laws of the United States, collecting income taxes from individuals and entities, and providing income tax refunds to eligible individuals and entities.

e. An “access device” was any card, plate, code, account number, electronic serial number, mobile identification number, personal identification number, or other telecommunications service, equipment, or instrument identifier, or other means of account access, that could be used alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that could be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument), such as a prepaid debit card.

2. From in or about December 2012 through in or about January 2014, within the Northern District of Illinois and elsewhere, Defendant SHAMEKA CARR having knowingly and intentionally devised and participated in a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses, representations, and promises, caused to be placed in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the United States Postal Service (“Postal Service”), and did take and receive matters and things that had been delivered by the Postal Service, namely, prepaid debit cards and federal income tax refund checks, as described below.

The Scheme

3. It was part of the scheme that the Defendant SHAMEKA CARR would and did obtain the means of identification of individuals, including names, dates of birth, and Social Security numbers, without their authorization.

4. It was further part of the scheme that Defendant SHAMEKA CARR would and did use these means of identification to file fraudulent federal individual income tax returns without the knowledge or consent of the taxpayers listed on the tax returns and directed anticipated tax refunds to prepaid debit cards and to United States Treasury Checks.

5. It was further part of the scheme that Defendant SHAMEKA CARR would and did cause these prepaid debit cards and United States Treasury checks to be mailed to addresses within the Northern District of Illinois and elsewhere.

6. It was further part of the scheme that Defendant SHAMEKA CARR would and did use these prepaid debit cards to enrich herself.

7. It was further part of the scheme that Defendant SHAMEKA CARR would and did take steps to conceal and misrepresent the existence and purpose of the scheme.

Mailings

8. On or about each date listed below, in the Northern District of Illinois and elsewhere, Defendant SHAMEKA CARR, for the purpose of executing the scheme and artifice to defraud, and to aid and abet the same, caused to be placed in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service and did take and receive matters and things that had been delivered by the Postal Service, namely, prepaid debit cards and federal tax refund checks, as described below:

Count	Date of Offense	Mailing
1	12/21/12	Prepaid Debit Card in the name of C.A. with card number ending in 0508 addressed to C.A. on 6th Street, Belvidere, IL
2	12/23/12	Prepaid Debit Card in the name of M.C. with card number ending in 9229 addressed to M.C. on N. Hinkley Avenue, Rockford, IL
3	12/28/12	Prepaid Debit Card in the name of J.B. with card number ending in 8001 addressed to J.B. on N. Hinkley Avenue, Rockford, IL
4	1/30/13	Prepaid Debit Card in the name of K.C. with card number ending in 4273 addressed to K.C. on Wilson Street, Carpentersville, IL

Count	Date of Offense	Mailing
5	3/08/13	United States Treasury Check addressed to M.R. on Cardinal Lane, Carpentersville, IL in the amount of \$5716.00
6	1/26/14	Prepaid Debit Card in the name of S.D. with card number ending in 6236 addressed to S.D. on W. Locust Street, Belvidere, IL

All in violation of Title 18, United States Code, Section 1341.

COUNTS SEVEN THROUGH TWELVE
(Aggravated Identity Theft)

The NOVEMBER 2015 GRAND JURY further charges:

9. The allegations in paragraphs 1 through 8 of Counts One through Six are realleged and reincorporated herein.

10. On or about each date listed below, within the Northern District of Illinois and elsewhere, Defendant SHAMEKA CARR did knowingly possess, transfer, and use, without lawful authority, the means of identification of another person during and in relation to the offense in this Indictment identified as a Related Count below, that is, she knowingly possessed, transferred, and used the name, Social Security number, and account number of an actual person known to the grand jury, listed by his or her initials below, during and in relation to committing the offense of mail fraud in violation of 18 U.S.C. § 1341:

Count	Date of Offense	Individual	Related Count
7	12/21/12	C.A.	1
8	12/23/12	M.C.	2
9	12/28/12	J.B.	3
10	1/30/13	K.C.	4

Count	Date of Offense	Individual	Related Count
11	3/08/13	M.R.	5
12	1/26/14	S.D.	6

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5).

COUNT THIRTEEN
(Access Device Fraud)

The NOVEMBER 2015 GRAND JURY further charges:

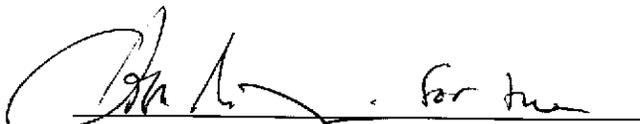
1. The allegations in paragraphs 1 through 8 of Counts One through Six are realleged and reincorporated herein.

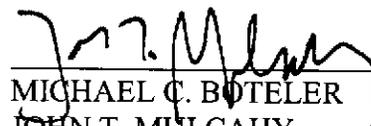
2. On or about August 27, 2014, in the Northern District of Illinois and elsewhere, Defendant SHAMEKA CARR, knowingly and with intent to defraud, possessed fifteen or more unauthorized access devices, namely prepaid debit cards, said possession affecting interstate commerce.

All in violation of Title 18, United States Code, Section 1029(a)(3).

TRUE BILL

FOREPERSON


UNITED STATES ATTORNEY


MICHAEL C. BOTELER
JOHN T. MULCAHY
TRIAL ATTORNEYS
TAX DIVISION
UNITED STATES DEPARTMENT OF JUSTICE