

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

UNITED STATES OF AMERICA	:	CRIMINAL NO. 4:16-CR- <u>16</u>
	:	
v.	:	VIOLATIONS:
	:	18 U.S.C. § 371
TONYA ALEXANDER	:	18 U.S.C. §§ 641 & 2
_____	:	

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**GENERAL ALLEGATIONS**

At all times material to this Indictment:

1. The Defendant TONYA ALEXANDER resided in Columbus, Georgia, within the Middle District of Georgia, and worked as a bank teller at SunTrust Bank in Columbus, Georgia. Vicky Wheeler resided in Columbus, Georgia and worked as a bank teller at SunTrust Bank in Columbus, Georgia. The Defendant TONYA ALEXANDER and Vicky Wheeler received and cashed over 500 U.S. Treasury tax refund checks that claimed in excess of \$1,000,000 in fraudulent tax refunds.

2. 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, or date of birth.

3. 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.

**COUNT ONE**

(Conspiracy to Commit Theft of Public Money)

4. The factual allegations contained in Paragraphs 1 through 3 of the General Allegations Section of this Indictment are realleged and incorporated herein as if copied verbatim.

5. Beginning on or about June 2012 and continuing until on or about December 2013, in the Middle District of Georgia and elsewhere, the Defendant TONYA ALEXANDER, Vicky Wheeler, Person A, Person B, and others, known and unknown to the grand jury, did unlawfully, voluntarily, intentionally, and knowingly conspire, combine, confederate, and agree together and with each other to commit the offense of theft of public money, in violation of Title 18, United States Code, Section 641.

**MANNER AND MEANS**

6. To accomplish the objects of this scheme, the Defendant TONYA ALEXANDER and others used the following manners and means, among others:

7. Tracy Mitchell, Keshia Lanier, and others, known and unknown to the grand jury, would and did unlawfully obtain the means of identification of individuals, including their names and Social Security numbers.

8. Tracy Mitchell, Keshia Lanier, Latasha Mitchell and others, known and unknown to the grand jury, would and did use these means of identification to prepare and electronically file fraudulent income tax returns. These tax returns would and did direct anticipated tax refunds to prepaid debit cards, to United States ("U.S.") Treasury federal income tax refund checks, and to financial institutions which in turn issued the refunds via checks.

9. Tracy Mitchell, Keshia Lanier, and others, known and unknown to the grand jury, would and did obtain the U.S. Treasury federal income tax refund checks and tax refund checks from financial institutions and provided those checks to other individuals, including Person A and Person B, to cash.

10. Person A, Person B, and others, known and unknown to the grand jury, would and did provide those tax refund checks to the Defendant TONYA ALEXANDER for her to cash at SunTrust Bank. In exchange, the Defendant TONYA ALEXANDER would and did receive a portion of the checks.

11. The Defendant TONYA ALEXANDER would and did cash some of the tax refund checks. The Defendant TONYA ALEXANDER would and did provide some of those tax refund checks to Vicky Wheeler to cash.

12. The Defendant TONYA ALEXANDER and Vicky Wheeler would and did cash tax refund checks in violation of SunTrust Bank policy.

13. The Defendant TONYA ALEXANDER would and did provide the proceeds of the tax refund checks to Person A, Person B, and others.

14. The Defendant TONYA ALEXANDER and others would and did take steps to conceal the existence of the conspiracy.

#### **OVERT ACTS**

15. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed by or caused to be committed by one or more members of the conspiracy, in the Middle District of Georgia and elsewhere:

16. On several dates between June 2012 and December 2013, Person A provided to the Defendant TONYA ALEXANDER U.S. Treasury federal income tax refund checks and tax refund checks from financial institutions.

17. On several dates between June 2012 and December 2013, Person B provided to the Defendant TONYA ALEXANDER U.S. Treasury federal income tax refund checks and tax refund checks from financial institutions.

18. On or about each date listed below, the Defendant TONYA ALEXANDER cashed a U.S. Treasury federal income tax refund check in the amount and in the name of the individual whose initials are listed below:

<b>Paragraph</b>	<b>Date of Offense</b>	<b>Individual</b>	<b>Amount</b>
19.	11/27/2012	H.P.	\$1,626
20.	11/27/2012	Z.P.	\$1,621
21.	07/26/2013	A.A.	\$2,094
22.	08/13/2013	J.S.	\$1,466
23.	08/16/2013	M.C.	\$2,708
24.	08/21/2013	B.B.	\$2,096
25.	08/28/2013	C.C.	\$2,697
26.	09/27/2013	K.A.	\$2,297
27.	10/03/2013	T.S.	\$2,310
28.	10/25/2013	C.P.	\$2,485

29. On several dates between June 2012 and December 2013, the Defendant TONYA ALEXANDER provided the proceeds from the tax refund checks to Person A and Person B.

30. In or about late 2012, the Defendant TONYA ALEXANDER recruited Vicky Wheeler to cash tax refund checks.

31. On several dates in 2013, the Defendant TONYA ALEXANDER provided United States Treasury federal income tax refund checks to Vicky Wheeler for cashing.

32. On several dates in 2013, Wheeler would and did cash the tax refund checks and provide the proceeds to the Defendant TONYA ALEXANDER.

All in violation of Title 18, United States Code, Section 371.

**COUNTS TWO THROUGH ELEVEN**  
(Theft of Public Money)

33. The factual allegations contained in Paragraphs 1 through 3 of the General Allegations Section of this Indictment are realleged and incorporated herein as if copied verbatim.

34. On or about each date listed below, within the Middle District of Georgia, the Defendant TONYA ALEXANDER did steal, purloin, and knowingly convert to her own use and the use of another, money of the United States, namely, funds administered by the Department of the Treasury in the form of a federal income tax refund check in the amount and in the name of the individual whose initials are listed below:

<b>Count</b>	<b>Date of Offense</b>	<b>Individual</b>	<b>Amount</b>
<b>TWO</b>	11/27/2012	H.P.	\$1,626
<b>THREE</b>	11/27/2012	Z.P.	\$1,621
<b>FOUR</b>	07/26/2013	A.A.	\$2,094
<b>FIVE</b>	08/13/2013	J.S.	\$1,466
<b>SIX</b>	08/16/2013	M.C.	\$2,708
<b>SEVEN</b>	08/21/2013	B.B.	\$2,096
<b>EIGHT</b>	08/28/2013	C.C.	\$2,697
<b>NINE</b>	09/27/2013	K.A.	\$2,297
<b>TEN</b>	10/03/2013	T.S.	\$2,310
<b>ELEVEN</b>	10/25/2013	C.P.	\$2,485

All in violation of Title 18, United States Code, Sections 641 and 2.

A TRUE BILL

s/Foreperson of the Grand Jury  
FOREPERSON OF THE GRAND JURY

Presented by:

G.F. PETERMAN, III  
ACTING UNITED STATES ATTORNEY

Michael C. Boteler  
Michael C. Boteler  
Trial Attorney  
United States Department of Justice  
Tax Division, Southern Criminal Enforcement Section

Crawford L. Seals  
Assistant United States Attorney

Filed in open court this 12<sup>th</sup> day of May, 2016

Crawford L. Seals  
Deputy Clerk