

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

UNITED STATES OF AMERICA

v.

INDICTMENT

TANGELA LAWSON-BROWN
_____ /

4:17cr40-MW

THE GRAND JURY CHARGES:

COUNTS ONE AND TWO

A. THE CHARGE

Between on or about January 1, 2010, and on or about December 31, 2013,
in the Northern District of Florida and elsewhere, the defendant,

TANGELA LAWSON-BROWN,

did knowingly and willfully devise and intend to devise a scheme to defraud and
for obtaining money and property by means of materially false and fraudulent
pretenses, representations, and promises, and for the purpose of executing such
scheme, did cause wire communications to be transmitted in interstate commerce.

B. SCHEME TO DEFRAUD

It was a part of this scheme that:

1. The defendant caused false and fraudulent federal income tax returns
("fraudulent returns") to be prepared for the purpose of generating and obtaining
the payment of tax refunds.

2. In order to prepare fraudulent returns, the defendant collected the personal identifying information of other persons, including names, dates of birth, and social security numbers from patients at nursing homes where she worked.

3. In order to prepare and track the fraudulent returns, the defendant maintained a notebook containing: the personal identifying information of other persons, including names, dates of birth, and social security numbers; notations reflecting the dates the fraudulent returns were filed, the amount of refunds sought, other return information, addresses and e-mail addresses used in the returns, and that some named taxpayers were deceased.

4. The defendant caused refunds issued on fraudulent returns to be deposited into her personal bank account.

5. The defendant caused fraudulent returns to be filed in her own name and in the names of others.

6. The defendant converted to her own use and benefit and that of others, proceeds obtained from the filing of fraudulent income tax returns.

C. WIRE COMMUNICATIONS

On or about the following dates, for the purpose of executing this scheme to defraud, the defendant,

TANGELA LAWSON-BROWN,

knowingly did cause wire communications to be transmitted in interstate commerce as set forth below:

COUNT	DATE	VICTIM	COMMUNICATION
ONE	July 5, 2012	K.C.	Deposit of \$1,033 into defendant's bank account
TWO	September 4, 2012	M.J.	Filing of 2011 federal income tax return

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THREE

On or about July 5, 2012, in the Northern District of Florida, the defendant,

TANGELA LAWSON-BROWN,

knowingly and willfully did receive, conceal, and retain with intent to convert to her own use and gain, money of the United States, to wit, money of the Internal Revenue Service, an agency of the United States, in an amount greater than \$1,000, knowing such money to have been embezzled, stolen, and converted.

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

COUNT FOUR

Between on or about August 1, 2012, and on or about January 22, 2013, in the Northern District of Florida, the defendant,

TANGELA LAWSON-BROWN,

knowingly and with the intent to defraud, did possess fifteen or more unauthorized access devices, to wit, social security numbers, and by this offense did affect interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(3) and 1029(c)(1)(A)(i).

COUNT FIVE

Between on or about July 5, 2012, and on or about January 22, 2013, in the Northern District of Florida, the defendant,

TANGELA LAWSON-BROWN,

did knowingly possess and use, without lawful authority, means of identification of another person, to wit, the name, date of birth, and social security number of M.J., and the social security number of K.C., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely wire fraud as charged in Counts One and Two of this Indictment, theft of government funds as charged in Count Three of this Indictment, and possession of fifteen or more unauthorized access devices as charged in Count Four of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

CRIMINAL FORFEITURE

The allegations contained in Counts One through Four of this Indictment are

hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

From her engagement in the violations alleged in Counts One through Four of this Indictment, the defendant,

TANGELA LAWSON-BROWN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c), any and all of the defendant's right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offenses; and any personal property used and intended to be used to commit Count Four, pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

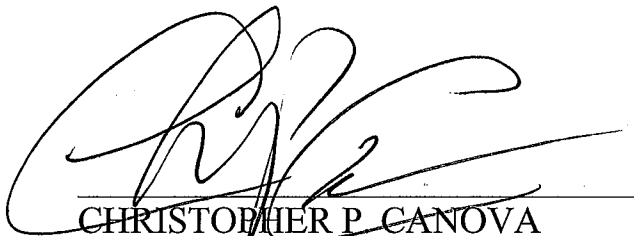
If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendants:

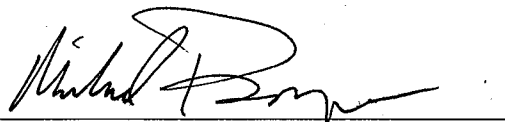
- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

6-7-17
DATE


CHRISTOPHER P. CANOVA
United States Attorney


MICHAEL T. SIMPSON
Assistant United States Attorney