

S

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>4:16-cr-36 (CDL) -</u>
	:	
v.	:	VIOLATIONS:
	:	18 U.S.C. § 286
HAROLD COLEY	:	18 U.S.C. § 1341
	:	18 U.S.C. § 1028A(a)(1), (c)(5)
	:	18 U.S.C. § 1709
_____	:	18 U.S.C. § 981(a)(1)(C)

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

1. Defendant HAROLD COLEY resided in Columbus, Georgia, within the Middle District of Georgia. Coley was an employee of the United States Postal Service and worked as a mail carrier in Columbus, Georgia.

2. Keshia Lanier, also known as “Keshia Gray” and “Keshia Williams,” resided in Seale, Alabama, and in Newnan, Georgia. Mequetta Snell-Quick resided in Columbus, Georgia. Talashia Hinton, also known as “LayLay” and “LaLa,” resided in Phenix City, Alabama.

3. Tamika Floyd resided in Salem, Alabama, within the Middle District of Alabama. Between in or about 2006 and May 2013, Tamika Floyd was employed at a state agency located in Opelika, Alabama. Through her employment, Tamika Floyd had access to the means of identification of individuals.

4. 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.

5. 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 File False Claims)

1. The factual allegations contained in Paragraphs 1 through 5 of the General Allegations Section of this Indictment are realleged and incorporated herein as if copied verbatim.

2. From at least in or about January 2012 and continuing until in or about December 2013, within the Middle District of Georgia and elsewhere, Defendant

**HAROLD COLEY,**

co-conspirators Keshia Lanier, Mequetta Snell-Quick, Talashia Hinton, Tamika Floyd, and others, both known and unknown to the grand jury, unlawfully and knowingly agreed, combined, and conspired with others and each other to defraud the United States by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims.

**MANNER AND MEANS**

3. Defendant HAROLD COLEY, Keshia Lanier, Mequetta Snell-Quick, Talashia Hinton, Tamika Floyd, and others, both known and unknown to the grand jury, would and did agree to file and cause others to file false federal income tax returns in the names of third parties without their knowledge.

4. Keshia Lanier, Mequetta Snell-Quick, Talashia Hinton, Tamika Floyd, and others would and did obtain the means of identification of individuals, including their names, dates of birth, and Social Security numbers.

5. Defendant HAROLD COLEY would and did provide addresses on his postal route to Keshia Lanier and others for the purpose of having fraudulent federal income tax refund checks mailed to those addresses. Many of the addresses provided were for vacant lots or homes that were vacant.

6. Keshia Lanier, Mequetta Snell-Quick, Talashia Hinton, and others would and did use these means of identification to prepare and file false federal income tax returns claiming tax refunds to which they were not entitled. They would and did direct the federal tax refunds to be mailed to addresses located along Defendant HAROLD COLEY's normal mail delivery route in Columbus, Georgia.

7. Defendant HAROLD COLEY, for payment, would and did divert the U.S. Treasury federal income tax refund checks from the mail and provide them to Keshia Lanier, Mequetta Snell-Quick, Talashia Hinton, and others.

8. Keshia Lanier, Talashia Hinton and others would and did cause U.S. Treasury federal income tax refund checks to be cashed at several businesses located in Alabama, Georgia, and Kentucky.

9. Defendant HAROLD COLEY, Keshia Lanier, Mequetta Snell-Quick, Talashia Hinton, Tamika Floyd, and others and others would and did take steps to conceal the existence of the conspiracy.

### **ACTS IN FURTHERANCE OF THE CONSPIRACY**

10. To accomplish the objectives of the conspiracy, in the Middle District of Georgia and elsewhere, and in furtherance thereof, Defendant HAROLD COLEY and others, both known and unknown to the grand jury, committed the following acts, among others:

11. On several dates between January 2012 and December 2013, Tamika Floyd obtained means of identification of individuals from her place of employment and provided those means of identification to Keisha Lanier, Talashia Hinton, and others.

12. On several dates between January 2012 and December 2013, Defendant HAROLD COLEY provided addresses from his postal route to Keisha Lanier and others for the purpose of having fraudulent federal income tax refund checks mailed to those addresses.

13. Keshia Lanier, Mequetta Snell-Quick, Talashia Hinton, and others prepared and filed, and caused to be prepared and filed, a false federal income tax return in the name of each of the following individuals whose initials are listed below, on or about the date and claiming a refund in the amount listed below:

<b>Paragraph</b>	<b>Individual</b>	<b>Date of Filing</b>	<b>Refund Claimed</b>
14.	Z.L.	08/23/2012	\$919
15.	R.C.	08/15/2012	\$986
16.	A.R.	08/21/2012	\$977
17.	K.N.	08/21/2012	\$972
18.	L.P.	08/21/2012	\$985
19.	J.W.	08/16/2012	\$986

<b>Paragraph</b>	<b>Individual</b>	<b>Date of Filing</b>	<b>Refund Claimed</b>
20.	S.A.	08/23/2012	\$1,110
21.	T.B.	08/28/2012	\$885
22.	P.G.	09/11/2012	\$1,157
23.	M.S.	04/05/2013	\$1,112
24.	K.A.	08/13/2013	\$2,297
25.	N.A.	08/13/2013	\$2,041
26.	N.M.	08/27/2013	\$2,102
27.	A.M.	08/27/2013	\$2,041
28.	M.M.	08/27/2013	\$1,906
29.	D.T.	09/03/2013	\$2,017
30.	R.D.	09/17/2013	\$1,846
31.	J.G.	09/24/2013	\$1,925

32. On or about each date listed below, a U.S. Treasury federal tax refund check was entrusted to the United States Postal Service for delivery to the address listed below and such check was embezzled and taken by Defendant HAROLD COLEY:

<b>Paragraph</b>	<b>Date of Mailing</b>	<b>Mailed Item</b>
33.	08/31/2012	Refund check in the name of Z.L., addressed to Z.L. on Thomas St., in Columbus, Georgia
34.	08/31/2012	Refund check in the name of R.C., addressed to R.C. on 9 <sup>th</sup> St., in Columbus, Georgia
35.	08/31/2012	Refund check in the name of A.R., addressed to A.R. on 9 <sup>th</sup> St., in Columbus, Georgia

<b>Paragraph</b>	<b>Date of Mailing</b>	<b>Mailed Item</b>
36.	08/31/2012	Refund check in the name of K.N., addressed to K.N. on 9 <sup>th</sup> St., in Columbus, Georgia
37.	09/07/2012	Refund check in the name of L.P., addressed to L.P. on 9 <sup>th</sup> St., in Columbus, Georgia
38.	09/07/2012	Refund check in the name of J.W., addressed to J.W. on Thomas St., in Columbus, Georgia
39.	09/14/2012	Refund check in the name of S.A., addressed to S.A. on 9 <sup>th</sup> St., in Columbus, Georgia
40.	09/21/2012	Refund check in the name of T.B., addressed to T.B. on Benner St., in Columbus, Georgia
41.	09/21/2012	Refund check in the name of P.G., addressed to P.G. on Benner St., in Columbus, Georgia
42.	04/26/2013	Refund check in the name of M.S., addressed to M.S. on Thomas St., in Columbus, Georgia
43.	08/23/2013	Refund check in the name of K.A., addressed to K.A. on King St., in Columbus, Georgia
44.	08/23/2013	Refund check in the name of N.A., addressed to N.A. on King St., in Columbus, Georgia
45.	09/09/2013	Refund check in the name of N.M., addressed to N.M. on Thomas St., in Columbus, Georgia
46.	09/09/2013	Refund check in the name of A.M., addressed to A.M. on Thomas St., in Columbus, Georgia
47.	09/09/2013	Refund check in the name of M.M., addressed to M.M. on Thomas St., in Columbus, Georgia
48.	09/20/2013	Refund check in the name of D.T., addressed to D.T. on E. Wynnton Lane., in Columbus, Georgia
49.	09/27/2013	Refund check in the name of R.D., addressed to R.D. on Rigdon Rd., in Columbus, Georgia
50.	10/04/2013	Refund check in the name of J.G., addressed to J.G. on Colorado St. in Columbus, Georgia

51. On several dates between January 2012 and December 2013, Defendant HAROLD COLEY provided U.S. Treasury federal tax refund checks mailed to his postal route to Keisha Lanier, Mequetta Snell-Quick, Talashia Hinton, and others.

All in violation of Title 18, United States Code, Section 286.

**COUNTS TWO THROUGH NINETEEN**  
(Mail Fraud)

1. The factual allegations contained in Paragraphs 1 through 5 of the General Allegations Section of this Indictment are realleged and incorporated herein as if copied verbatim.

2. From in or about at least January 2012 through in or about December 2013, within the Middle District of Georgia and elsewhere, Defendant HAROLD COLEY and others, known and unknown, 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, U.S. Treasury federal tax refund checks, as described below.

**THE SCHEME AND ARTIFICE**

3. The allegations contained in Paragraphs 3 through 9 of Count 1 of this Indictment are realleged and incorporated herein as if copied verbatim.

**THE MAILINGS**

4. On or about each date listed below, in the Middle District of GEORGIA and elsewhere, Defendant HAROLD COLEY and others, 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, a U.S. Treasury federal tax refund check, as described below:

<b>Count</b>	<b>Date of Offense</b>	<b>Mailing</b>
<b>TWO</b>	08/31/2012	Refund check in the name of Z.L., addressed to Z.L. on Thomas St., in Columbus, Georgia
<b>THREE</b>	08/31/2012	Refund check in the name of R.C., addressed to R.C. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>FOUR</b>	08/31/2012	Refund check in the name of A.R., addressed to A.R. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>FIVE</b>	08/31/2012	Refund check in the name of K.N., addressed to K.N. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>SIX</b>	09/07/2012	Refund check in the name of L.P., addressed to L.P. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>SEVEN</b>	09/07/2012	Refund check in the name of J.W., addressed to J.W. on Thomas St., in Columbus, Georgia
<b>EIGHT</b>	09/14/2012	Refund check in the name of S.A., addressed to S.A. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>NINE</b>	09/21/2012	Refund check in the name of T.B., addressed to T.B. on Benner St., in Columbus, Georgia
<b>TEN</b>	09/21/2012	Refund check in the name of P.G., addressed to P.G. on Benner St., in Columbus, Georgia
<b>ELEVEN</b>	04/26/2013	Refund check in the name of M.S., addressed to M.S. on Thomas St., in Columbus, Georgia
<b>TWELVE</b>	08/23/2013	Refund check in the name of K.A., addressed to K.A. on King St., in Columbus, Georgia
<b>THIRTEEN</b>	08/23/2013	Refund check in the name of N.A., addressed to N.A. on King St., in Columbus, Georgia
<b>FOURTEEN</b>	09/09/2013	Refund check in the name of N.M., addressed to N.M. on Thomas St., in Columbus, Georgia

<b>Count</b>	<b>Date of Offense</b>	<b>Mailing</b>
<b>SIXTEEN</b>	09/09/2013	Refund check in the name of M.M., addressed to M.M. on Thomas St., in Columbus, Georgia
<b>SEVENTEEN</b>	09/20/2013	Refund check in the name of D.T., addressed to D.T. on E. Wynnton Lane., in Columbus, Georgia
<b>EIGHTEEN</b>	09/27/2013	Refund check in the name of R.D., addressed to R.D. on Rigdon Rd., in Columbus, Georgia
<b>NINETEEN</b>	10/04/2013	Refund check in the name of J.G., addressed to J.G. on Colorado St. in Columbus, Georgia

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

**COUNTS TWENTY THROUGH THIRTY-SEVEN**

(Aggravated Identity Theft)

1. The factual allegations contained in Paragraphs 1 through 5 of the Introduction Section of this Indictment are realleged and incorporated herein as if copied verbatim.

2. On or about each date listed below, within the Middle District of Georgia, Defendant HAROLD COLEY did knowingly possess and transfer, 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, he knowingly possessed and transferred the name 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:

<b>Count</b>	<b>Date of Offense</b>	<b>Related Count</b>	<b>Individual</b>
<b>TWENTY</b>	08/31/2012	<b>TWO</b>	Z.L.
<b>TWENTY-ONE</b>	08/31/2012	<b>THREE</b>	R.C.
<b>TWENTY-TWO</b>	08/31/2012	<b>FOUR</b>	A.R.
<b>TWENTY-THREE</b>	08/31/2012	<b>FIVE</b>	K.N.

<b>Count</b>	<b>Date of Offense</b>	<b>Related Count</b>	<b>Individual</b>
<b>TWENTY-THREE</b>	08/31/2012	<b>FIVE</b>	K.N.
<b>TWENTY-FOUR</b>	09/07/2012	<b>SIX</b>	L.P.
<b>TWENTY-FIVE</b>	09/07/2012	<b>SEVEN</b>	J.W.
<b>TWENTY-SIX</b>	09/14/2012	<b>EIGHT</b>	S.A.
<b>TWENTY-SEVEN</b>	09/21/2012	<b>NINE</b>	T.B.
<b>TWENTY-EIGHT</b>	09/21/2012	<b>TEN</b>	P.G.
<b>TWENTY-NINE</b>	04/26/2013	<b>ELEVEN</b>	M.S.
<b>THIRTY</b>	08/23/2013	<b>TWELVE</b>	K.A.
<b>THIRTY-ONE</b>	08/23/2013	<b>THIRTEEN</b>	N.A.
<b>THIRTY-TWO</b>	09/09/2013	<b>FOURTEEN</b>	N.M.
<b>THIRTY - THREE</b>	09/09/2013	<b>FIFTEEN</b>	A.M.
<b>THIRTY - FOUR</b>	09/09/2013	<b>SIXTEEN</b>	M.M.
<b>THIRTY-FIVE</b>	09/20/2013	<b>SEVENTEEN</b>	D.T.
<b>THIRTY-SIX</b>	09/27/2013	<b>EIGHTEEN</b>	R.D.
<b>THIRTY-SEVEN</b>	10/04/2013	<b>NINETEEN</b>	J.G.

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

**COUNTS THIRTY-EIGHT THROUGH FORTY-EIGHT**

(Embezzlement of Mail)

1. The factual allegations contained in Paragraphs 1 through 5 of the General Allegations Section of this Indictment are realleged and incorporated herein as if copied verbatim.
2. On or about each date listed below, within the Middle District of Georgia, Defendant HAROLD COLEY, an employee of the United States Postal Service, knowingly

embezzled a letter, package, bag, mail, and any article and thing contained therein entrusted to him and which came into his possession intended to be conveyed by mail and carried and delivered by any carrier, agent and other person employed in any department of the Postal Service, namely, he embezzled the U.S. Treasury federal tax refund check listed below, which was addressed to the individual whose initials are listed below:

<b>Count</b>	<b>Date of Offense</b>	<b>Item</b>
<b>THIRTY-EIGHT</b>	08/31/2012	Refund check in the name of Z.L., addressed to Z.L. on Thomas St., in Columbus, Georgia
<b>THIRTY-NINE</b>	08/31/2012	Refund check in the name of R.C., addressed to R.C. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>FORTY</b>	08/31/2012	Refund check in the name of A.R., addressed to A.R. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>FORTY-ONE</b>	08/31/2012	Refund check in the name of K.N., addressed to K.N. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>FORTY-TWO</b>	09/07/2012	Refund check in the name of L.P., addressed to A.W. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>FORTY-THREE</b>	09/07/2012	Refund check in the name of J.W., addressed to J.W. on Thomas St., in Columbus, Georgia
<b>FORTY-FOUR</b>	09/14/2012	Refund check in the name of S.A., addressed to S.A. on 9 <sup>th</sup> St., in Columbus, Georgia
<b>FORTY-FIVE</b>	09/21/2012	Refund check in the name of T.B., addressed to T.B. on Benner St., in Columbus, Georgia
<b>FORTY-SIX</b>	09/21/2012	Refund check in the name of P.G., addressed to P.G. on Benner St., in Columbus, Georgia
<b>FORTY-SEVEN</b>	08/23/2013	Refund check in the name of K.A., addressed to K.A. on King St., in Columbus, Georgia
<b>FORTY-EIGHT</b>	08/23/2013	Refund check in the name of N.A., addressed to N.A. on King St., in Columbus, Georgia

All in violation of Title 18, United States Code, Section 1709.

## FORFEITURE ALLEGATION

1. The allegations contained in Counts Two through Twenty of this Indictment are realleged and incorporated herein as if copied verbatim for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction for the offenses alleged in Counts Two through Nineteen, the Defendant HAROLD COLEY shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property constituting or derived from the proceeds said Defendant obtained directly or indirectly as a result of said offenses, including but not limited to:

a. A money judgment in the amount of \$924,923.

3. If any of the property subject to forfeiture, as a result of any act or omission of the Defendant,

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

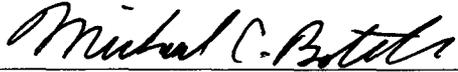
the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), up to the value of the forfeitable property described above.

A TRUE BILL.

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

G. F. PETERMAN, III  
UNITED STATES ATTORNEY

Presented by:

  
MICHAEL C. BOTELER

  
WILLIAM M. MONTAGUE  
TRIAL ATTORNEYS  
UNITED STATES DEPARTMENT OF JUSTICE  
TAX DIVISION

Filed in open court this 9th day of November, AD 2016.

  
Deputy Clerk