

**ORIGINAL**

FILED IN OPEN COURT  
U.S.D.C. - Atlanta

APR 25 2017

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

By: JAMES N. HATTEN, Clerk  
Deputy Clerk

UNITED STATES OF AMERICA

*v.*

STEPHANIE PARKER

Criminal Indictment

No. **1 :17 - CR - 143**

THE GRAND JURY CHARGES THAT:

**Counts One through Five**

**(Wire Fraud - 18 U.S.C. §§ 1343 and 2)**

At times relevant to this Indictment:

1. Defendant STEPHANIE PARKER resided in Atlanta, Georgia, in the Northern District of Georgia. Since November 2010, defendant STEPHANIE PARKER was an employee of the Internal Revenue Services ("IRS") and worked in the Chamblee, Georgia office, in the Northern District of Georgia. Through her employment, defendant STEPHANIE PARKER had access to the means of identification of individuals.

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, date of birth, or address.

3. The IRS was an agency of the United States Department of the Treasury responsible for administering the tax laws of, and collecting taxes owed to, the United States.

4. From at least in or about September 2012, and continuing through at least in or about April 2013, in the Northern District of Georgia and elsewhere, defendant STEPHANIE PARKER, aided and abetted by others known and unknown to the Grand Jury, knowingly devised and intended to devise a scheme and artifice to defraud the IRS, and to obtain money from the IRS by means of materially false and fraudulent pretenses, representations, promises, and by omission of material facts, well knowing and having reason to know that said pretenses, representations, and promises were false and fraudulent when made and caused to be made and that said omissions were and would be material.

#### **Scheme and Artifice to Defraud**

5. It was part of the scheme and artifice that defendant STEPHANIE PARKER would and did, through her IRS employment, access taxpayer information, including their means of identification.

6. It was further part of the scheme and artifice that defendant STEPHANIE PARKER would and did take the means of identification of taxpayers for her own use.

7. It was further part of the scheme and artifice that defendant STEPHANIE PARKER and others, both known and unknown to the Grand Jury, would and did prepare and electronically file fraudulent income tax returns in the names of those taxpayers and directed anticipated tax refunds to bank accounts held in the name of S.B. and C.H. Those tax returns were electronically filed from defendant STEPHANIE PARKER's residence in Atlanta, Georgia and the returns were transmitted across state lines to be processed by the IRS.

| COUNT | RELATED COUNT | DATE      | ACTUAL PERSON |
|-------|---------------|-----------|---------------|
| Six   | One           | 1/31/2013 | J.C.          |
| Seven | Two           | 3/6/2013  | B.C.          |
| Eight | Three         | 2/28/2013 | E.C.          |
| Nine  | Four          | 2/26/2013 | J.J.          |
| Ten   | Five          | 3/13/2013 | S.O.          |

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

A True BILL  
Donna Kuhl  
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