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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

September 2010 Grand Jury

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
MARIBEL RINCON, )  
 )  
Defendant. )  
 )  
 )  
 )  
 )  
 )  
 )

SA CR No. 11-2427  
**SACR 11-2427**  
I N D I C T M E N T  
[18 U.S.C. § 287: False,  
Fictitious, or Fraudulent Claims  
Against the United States; 18  
U.S.C. § 2(b): Causing an Act to  
Be Done]

**UNDER SEAL**

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 287, 2(b)]

On or about November 4, 2009, in Los Angeles County, within  
the Central District of California, and elsewhere, defendant  
MARIBEL RINCON made and presented, and caused to be made and  
presented, to the United States Treasury Department, through the  
Internal Revenue Service, a claim against the United States for  
payment of a fraudulent tax refund in the amount of \$741,584 and  
on behalf of N.D., with knowledge that such claim was false,

1 fictitious, and fraudulent because it was based upon a fictitious  
2 federal income tax withholding in the amount of \$1,130,000.

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COUNT TWO

[18 U.S.C. §§ 287, 2(b)]

On or about November 16, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant MARIBEL RINCON made and presented, and caused to be made and presented, to the United States Treasury Department, through the Internal Revenue Service, a claim against the United States for payment of a fraudulent tax refund in the amount of \$192,351 and on behalf of J.J.G., with knowledge that such claim was false, fictitious, and fraudulent because it was based upon a fictitious federal income tax withholding in the amount of \$284,197.

COUNT THREE

[18 U.S.C. §§ 287, 2(b)]

On or about February 9, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant MARIBEL RINCON made and presented, and caused to be made and presented, to the United States Treasury Department, through the Internal Revenue Service, a claim against the United States for payment of a fraudulent tax refund in the amount of \$333,285 and on behalf of S.P. and V.L.P., with knowledge that such claim was false, fictitious, and fraudulent because it was based upon a fictitious federal income tax withholding in the amount of \$490,000.

COUNT FOUR

[18 U.S.C. §§ 287, 2(b)]

On or about June 21, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant MARIBEL RINCON made and presented, and caused to be made and presented, to the United States Treasury Department, through the Internal Revenue Service, a claim against the United States for payment of a fraudulent tax refund in the amount of \$397,641 and on behalf of F.J.P. and C.P., with knowledge that such claim was false, fictitious, and fraudulent because it was based upon a fictitious federal income tax withholding in the amount of \$583,999.

A TRUE BILL

151  
Foreperson

ANDRÉ BIROTTE JR.  
United States Attorney

  
ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Criminal Division

DENNISE D. WILLETT  
Assistant United States Attorney  
Chief, Santa Ana Branch Office

CHARLES E. PELL  
Assistant United States Attorney  
Santa Ana Branch Office

IGNACIO PEREZ DE LA CRUZ  
Trial Attorney, Tax Division  
United States Department of Justice