

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: <u>May 27, 2014</u>
AHMED KAMARA	:	VIOLATIONS:
MUSA TURAY	:	18 U.S.C. § 371 (conspiracy)
GEBAH KAMARA	:	26 U.S.C. § 7206(2) (aiding or assisting
IBRAHIM KAMARA	:	in the preparation of false federal
DAUDA KOROMA	:	income tax returns - 38 counts)
FODAY MANSARAY	:	26 U.S.C. § 7206(1) (filing false federal
	:	income tax returns - 14 counts)
	:	18 U.S.C. § 1343 (wire fraud – 6 counts)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft – 6 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Medmans Financial Services (“Medmans”) was a tax preparation business located in Philadelphia, Pennsylvania, which was owned and operated by Mohamed Mansaray, an individual known to the Grand Jury and charged elsewhere.

2. Defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY worked at Medmans, and prepared and electronically filed income tax returns, including Internal Revenue Service Forms 1040 and 1040A, for clients each year in exchange for a preparation fee of approximately \$150. Mohamed

Mansaray and defendants MUSA TURAY, IBRAHIM KAMARA, and DAUDA KOROMA worked at the Medmans office located on 65th Street in Philadelphia, known as Tax Central 1. Defendants AHMED KAMARA and FODAY MANSARAY worked at the Medmans office located on Woodland Avenue in Philadelphia, known as Tax Central 2. In addition to preparing tax returns, defendant AHMED KAMARA managed Tax Central 2.

3. In addition to preparing income tax returns through Medmans, defendants MUSA TURAY, IBRAHIM KAMARA, and FODAY MANSARAY worked as direct support professionals for the Devereux Foundation (“Devereux”) in Pennsylvania, providing care at a residential facility for persons with intellectual and developmental disabilities.

4. Defendant GEBAH KAMARA was employed as a social worker at Catholic Social Services (“CSS”) in Philadelphia, Pennsylvania until in or about November 2011. As a social worker, defendant GEBAH KAMARA managed the cases of numerous children who were referred to CSS by the Philadelphia Department of Human Services for placement with foster families. In that position, defendant GEBAH KAMARA had access to foster children’s names, dates of birth, and Social Security numbers (collectively “personal identity information”).

5. The Internal Revenue Service (“IRS”) was an agency of the United States Department of Treasury responsible for the ascertainment and collection of revenue, including income tax revenue, and the disbursement of tax refunds to clients whose tax payments in a particular year exceeded the amount of their actual tax liability.

6. The IRS Code prescribes rules, regulations, and procedures for determining entitlement to claim dependents on tax returns, which in turn enable taxpayers to claim child tax credits, including the earned income tax credit and an additional child tax credit, both of which are

refundable credits and enable the taxpayer to receive a refund. The additional child tax credit is for the taxpayer who received less than the full amount of the child tax credit.

7. The Electronic Filing Program was a program instituted, directed, and operated by the IRS under which clients and tax preparers were permitted to file income tax returns by computer, online via the internet.

8. A federal individual income tax return filed using the Electronic Filing Program was accepted and processed by the IRS so long as all Social Security numbers included on the return, including the Social Security numbers of any dependents, were legitimate and had not been included on any return previously filed and accepted by the IRS for that same tax year.

9. TaxWorks was a tax preparation software that allowed tax professionals to prepare and file online via the internet federal income tax returns using a secured server. From in or about 2009 through 2012, for the tax years 2008 through 2011, TaxWorks secured server was located in Utah. In or about 2013, for the tax year 2012, TaxWorks secured server was located in Missouri. TaxWorks electronically submitted the tax returns in batches to the IRS in Tennessee and West Virginia.

10. Defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY used TaxWorks to prepare and electronically file income tax returns for clients from the Medmans offices in Philadelphia.

11. From in or about January 2008 through at least April 2013, in Philadelphia in the Eastern District of Pennsylvania and elsewhere, defendants

**AHMED KAMARA,
MUSA TURAY,
GEBAH KAMARA,**

**IBRAHIM KAMARA,
DAUDA KOROMA, and
FODAY MANSARAY**

conspired and agreed, together with Mohamed Mansaray and others known and unknown to the grand jury, to commit offenses against the United States, that is to knowingly defraud the United States by aiding and assisting in the preparation and presentation to the Internal Revenue Service of federal Individual Income Tax Returns, Forms 1040 and 1040A, which returns were false and fraudulent as to material matters, in violation of Title 26, United States Code, Section 7206(2).

MANNER AND MEANS

It was part of the conspiracy that:

12. Defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY repeatedly falsified information on federal income tax returns that they prepared in order to generate large fraudulent tax refunds for clients.

13. Defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY falsified information about dependents and fraudulently added individuals as dependents on tax returns in order to generate fraudulent refunds, some in excess of \$9,000.

14. Defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY charged clients an additional fee of up to approximately \$800 for fraudulently including a dependent on an income tax return, or withheld the additional fee from the client's refund to pay for the fraudulent use of dependents.

15. By fraudulently adding dependents to income tax returns, defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and

FODAY MANSARAY falsely claimed on behalf of their clients a tax exemption for each dependent, and the child tax credit, and often claimed a tax credit for child and dependent care expenses and the earned income tax credit.

16. Defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY falsely claimed education credits, including the Lifetime Learning credit and the American Opportunity credit, for clients, clients' dependents, and for dependents falsely added to income tax returns.

17. To create fraudulent dependents on income tax returns, defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY used the personal identity information of children whose foster care cases were managed by CSS ("CSS foster children"), and disabled individuals who received services through the Devereux Foundation, among others.

18. Defendant GEBAH KAMARA sold the personal identity information of CSS foster children to Mohamed Mansaray and defendant AHMED KAMARA. Mohamed Mansaray and defendant AHMED KAMARA, in turn, shared the CSS foster children's personal identity information with defendants MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY to create fraudulent dependents on income tax returns.

19. Defendant AHMED KAMARA paid defendant GEBAH KAMARA for each CSS foster child's personal identity information that was used to create a dependent on a client's tax return, provided that the tax return was accepted by the IRS and a refund was generated.

OVERT ACTS

In furtherance of the conspiracy, defendants AHMED KAMARA, MUSA TURAY, GEBAH KAMARA, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY, and others known and unknown to the Grand jury, committed the following overt acts in the Eastern District of Pennsylvania:

1. On or about February 3, 2010, defendant AHMED KAMARA electronically filed a fraudulent federal individual income tax return for tax year 2009 that listed the name and Social Security number of T.B. as the dependent of tax filer E.M., knowing that T.B. was not the dependent of E.M., and generating a fraudulent refund in the amount of approximately \$7,348. Defendant GEBAH KAMARA provided the personal identity information of T.B. to be used as a fraudulent dependent on a tax return.

2. On or about January 15, 2011, defendant MUSA TURAY electronically filed a fraudulent federal individual income tax return for tax year 2010 that listed the names and Social Security numbers of B.M. and D.P. as the dependents of tax filer S.S., knowing that B.M. and D.P. were not dependents of S.S., and generating a fraudulent refund in the amount of approximately \$8,788. Defendant GEBAH KAMARA provided the personal identity information of B.M. and D.P. for use as fraudulent dependents on a tax return.

3. On or about January 15, 2011, defendant IBRAHIM KAMARA electronically filed a fraudulent federal individual income tax return for tax year 2010 that listed the name and Social Security number of J.S. as the dependent of tax filer A.K. knowing that J.S. was not the dependent of A.K., and generating a fraudulent refund in the amount of approximately

\$9,522. Defendant GEBAH KAMARA provided the personal identity information of J.S. for use as a fraudulent dependent on a tax return.

4. On or about February 8, 2011, defendant DAUDA KOROMA electronically filed a fraudulent federal individual income tax return for tax year 2010 that listed the name and Social Security number of A.W. as the dependent of tax filer C.F., knowing that A.W. was not the dependent of C.F., and generating a fraudulent refund in the amount of approximately \$5,764. Defendant GEBAH KAMARA provided the personal identity information of A.W. for use as a fraudulent dependent on a tax return.

5. On or about January 18, 2010, defendant FODAY MANSARAY electronically filed a fraudulent federal individual income tax return for tax year 2009 that listed the names and Social Security numbers of S.G. and N.G. as the dependents of tax filer I.T., knowing that S.G. and N.G. were not dependents of I.T., and generating a fraudulent refund in the amount of approximately \$8,777. Defendant GEBAH KAMARA provided the personal identity information of S.G. and N.G. for use as fraudulent dependents on a tax return.

In violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 12 through 19 and Overt Act 1 of Count One are realleged here.
2. Defendant AHMED KAMARA repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.
3. Defendant AHMED KAMARA falsified information about clients' expenses in order to generate, among other things, false education credits, including the Lifetime Learning credit and the American Opportunity credit.
4. Defendant AHMED KAMARA falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.
5. On or about the dates listed below, in Philadelphia in the Eastern District of Pennsylvania, defendant

AHMED KAMARA

willfully aided and assisted in, and procured, counseled and advised the preparation and presentation to the Internal Revenue Service of federal Individual Income Tax Returns, Forms 1040 and Forms 1040A, either individual or joint, for the clients and calendar years listed below, each constituting a separate count, which returns were false and fraudulent as to material matters,

in that they represented that the clients, whose identities are known to the Grand jury, were entitled to claim dependents, deductions and credits, whereas, as AHMED KAMARA well knew, the clients were not entitled to claim such dependents, deductions and credits:

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
2	2/3/2010	2009	E.M.	Filing status, dependent T.B., education credit for tax filer, earned income tax credit, additional child tax credit.	\$7,348
3	1/16/2011	2010	E.M.	Education credit for tax filer.	\$2,564
4	1/26/2009	2008	E.J.	Filing status, dependent M.K., education credit for tax filer, earned income tax credit, additional child tax credit.	\$6,582
5	1/15/2010	2009	E.J.	Filing status, dependents M.K. and K.T., earned income tax credit, child tax credit, additional child tax credit.	\$6,501
6	1/16/2011	2010	E.J.	Filing status, dependent K.T., education credit for tax filer, earned income tax credit, child tax credit, additional child tax credit.	\$5,416
7	3/11/2011	2010	L.A.	Education credit for tax filer.	\$2,213

All in violation of Title 26, United States Code, Section 7206(2).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10, 12 through 19 and Overt Act 1 of Count One are realleged here.

THE SCHEME

2. From in or about January 2009 through in or about April 2012, defendant

AHMED KAMARA

devised and intended to devise a scheme to defraud the IRS, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of that scheme that:

3. Defendant AHMED KAMARA repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.

4. Defendant AHMED KAMARA falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.

5. Defendant AHMED KAMARA charged clients a fee of up to approximately \$800 to include a fraudulent dependent on an income tax return.

6. Defendant AHMED KAMARA submitted, or caused to be submitted, electronically over the internet through the use of TaxWorks software clients' income tax returns

that contained false and fraudulent information. These returns were submitted interstate from the Medmans' offices in Philadelphia to the TaxWorks server in Utah. TaxWorks then submitted the returns in batches to the IRS servers located in Tennessee and West Virginia.

7. On or about the date listed below, in the Eastern District of Pennsylvania, defendant

AHMED KAMARA

for the purpose of executing the scheme described above, and aiding and abetting its execution, knowingly transmitted, or caused to be transmitted, by means of wire communication in interstate commerce the signals and sounds described below:

DATE	DESCRIPTION OF WIRE
2/3/2010	Electronically-filed federal individual income tax return for tax year 2009 of taxpayer E.M. fraudulently claiming dependent T.B.

In violation of Title 18, United States Code, Section 1343.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10, 12 through 19 and Overt Act 1 of Count One, and Paragraphs 3 through 6 of Count Eight are realleged here.

2. On or about February 3, 2010, in the Eastern District of Pennsylvania, defendant

AHMED KAMARA

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the name and Social Security number of an individual, T.B., during and in relation to wire fraud, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNTS TEN THROUGH THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2, and 5 through 8 of Count One are realleged here.
2. Defendant AHMED KAMARA repeatedly falsified information on his personal federal income tax returns, Forms 1040, in order to generate large fraudulent tax refunds.
3. Defendant AHMED KAMARA fraudulently added an individual, N.W. as a dependent on his federal tax return. By fraudulently adding a dependent to his income tax returns, defendant AHMED KAMARA falsely claimed a tax exemption for the dependent, the child tax credit, and the child and dependent care credit.
4. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

AHMED KAMARA

willfully made and subscribed federal Individual Income Tax Returns, Forms 1040, for the calendar years listed below, each constituting a separate count, which were verified by a written declaration that they were made under the penalty of perjury, which defendant AHMED KAMARA did not believe to be true and correct as to every material matter, in that the returns represented that AHMED KAMARA was entitled to claim the dependent, deductions and credits listed below, whereas, as AHMED KAMARA well knew, he was not entitled to claim such dependent, deductions and credits:

Count	Date Return Filed	Tax Year	Falsely Claimed Items	Amount of Claimed Refund
10	1/16/2009	2008	Filing status, dependent N.W., child tax credit, additional child tax credit, child and dependent care expense.	\$6,373
11	1/14/2010	2009	Filing status, dependent, N.W., child tax credit, additional child tax credit.	\$9,131
12	1/14/2011	2010	Filing status, dependent N.W., child tax credit, additional child tax credit, child and dependent care expense.	\$8,991
13	1/13/2012	2011	Filing status, dependent N.W., earned income tax credit, child tax credit additional child tax credit, child and dependent care expense.	\$5,268

All in violation of Title 26, United States Code, Section 7206(1).

COUNTS FOURTEEN THROUGH TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 12 through 19, and Overt Act 2 of Count One are realleged here.

2. Defendant MUSA TURAY repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.

3. Defendant MUSA TURAY falsified information about clients' expenses in order to generate, among other things, false education credits, including the Lifetime Learning credit and the American Opportunity credit.

4. Defendant MUSA TURAY falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.

5. On or about the dates listed below, in Philadelphia in the Eastern District of Pennsylvania, defendant

MUSA TURAY

willfully aided and assisted in, and procured, counseled and advised the preparation and presentation to the Internal Revenue Service of federal Individual Income Tax Returns, Forms 1040 and Forms 1040A, either individual or joint, for the clients and calendar years listed below, each constituting a separate count, which returns were false and fraudulent as to material matters, in that they represented that the clients, whose identities are known to the Grand jury, were entitled

to claim dependents, deductions and credits, whereas, as MUSA TURAY well knew, the clients were not entitled to claim such dependents, deductions and credits:

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
14	1/15/2011	2010	A.T.	Filing status, dependents J.P. and Q.P., education credits for false dependents, earned income tax credit, additional child tax credit.	\$8,576
15	1/18/2009	2008	S.S	Filing status, dependents W.C. and K.G., education expenses for false dependents, earned income tax credit, child tax credit, additional child tax credit.	\$7,056
16	1/23/2010	2009	S.S	Filing status, dependents B.M. and D.P., earned income tax credit, child tax credit, additional child tax credit.	\$7,151
17	1/15/2011	2010	S.S.	Filing status, dependents B.M. and D.P., education expenses for dependents, earned income tax credit, additional child tax credit.	\$8,788
18	1/31/2011	2010	S.C.	Filing status, dependent Q.B., education credit for tax filer and dependent, additional child tax credit, child and dependent care expenses.	\$7,542
19	1/17/2009	2008	Z.W.	Filing status, dependent E.B., earned income tax credit.	\$3,702
20	1/15/2010	2009	Z.W.	Filing status, dependents S.O. and M.S., additional child tax credit, earned income tax credit.	\$7,288

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
21	1/14/2011	2010	Z.W.	Filing status, dependent S.O., earned income tax credit, additional child tax credit.	\$4,829

All in violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10, 12 through 19 and Overt Act 2 of Count One are realleged here.

THE SCHEME

2. From in or about January 2009 through in or about April 2012, defendant

MUSA TURAY

devised and intended to devise a scheme to defraud the IRS, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of that scheme that:

3. Defendant MUSA TURAY repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.

4. Defendant MUSA TURAY falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.

5. Defendant MUSA TURAY charged clients a fee of up to approximately \$800 to include a fraudulent dependent on an income tax return.

6. Defendant MUSA TURAY submitted, or caused to be submitted, electronically over the internet through the use of TaxWorks software clients' income tax returns that contained false and fraudulent information. These returns were submitted interstate from the

Medmans' offices in Philadelphia to the TaxWorks server in Utah. TaxWorks then submitted the returns in batches to the IRS servers located in Tennessee and West Virginia.

7. On or about the date listed below, in the Eastern District of Pennsylvania, defendant

MUSA TURAY

for the purpose of executing the scheme described above, and aiding and abetting its execution, knowingly transmitted, or caused to be transmitted, by means of wire communication in interstate commerce the signals and sounds described below:

DATE	DESCRIPTION OF WIRE
1/15/2011	Electronically-filed federal individual income tax return for tax year 2010 of taxpayer A.T. fraudulently claiming dependents Q.P. and J.P.

In violation of Title 18, United States Code, Section 1343.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

3. Paragraphs 1 through 10, 12 through 19 and Overt Act 2 of Count One, and Paragraphs 3 through 6 of Count Twenty-Two are realleged here.

4. On or about January 15, 2011, in the Eastern District of Pennsylvania, defendant

MUSA TURAY

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the names and Social Security numbers of two individuals, Q.P. and J.P., during and in relation to wire fraud, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNTS TWENTY-FOUR THROUGH TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2, and 5 through 8 of Count One are realleged here.
2. Defendant MUSA TURAY repeatedly falsified information on his personal federal income tax returns, Forms 1040 and 1040A, in order to generate large fraudulent tax refunds.
3. Defendant MUSA TURAY fraudulently added individuals as dependents on his federal income tax return. By fraudulently adding dependents to his income tax returns, defendant MUSA TURAY falsely claimed a tax exemption for dependents, the child tax credit, the child and dependent care expenses credit, and the earned income tax credit. Defendant MUSA TURAY also fraudulently claimed education expenses for the fraudulent dependent.
4. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

MUSA TURAY

willfully made and subscribed federal Individual Income Tax Returns, Forms 1040 and 1040A, for the calendar years listed below, each constituting a separate count, which were verified by a written declaration that they were made under the penalty of perjury, which defendant MUSA TURAY did not believe to be true and correct as to every material matter, in that the returns represented that MUSA TURAY was entitled to claim the dependent, deductions and credits listed below, whereas, as MUSA TURAY well knew, he was not entitled to claim such dependent, deductions and credits:

Count	Date Return Filed	Tax Year	Falsely Claimed Items	Amount of Claimed Refund
24	1/27/2009	2008	Filing status, dependents M.B. and F.N., earned income tax credit, education expenses for one dependent, additional child tax credit, child and dependent care expenses.	\$5,556
25	1/31/2010	2009	Filing status, dependents M.B. and G.M., earned income tax credit, education expenses for two dependents, additional child tax credit, child and dependent care expenses.	\$7,504
26	1/27/2011	2010	Filing status, dependents M.B. and N.S., earned income tax credit, education expenses for one dependent, additional child tax credit, child and dependent care expenses.	\$7,907
27	4/9/2012	2011	Filing status, dependents M.D. and A.S., earned income tax credit, education expenses for dependents, additional child tax credit, child and dependent care expenses.	\$7,971

All in violation of Title 26, United States Code, Section 7206(1).

COUNTS TWENTY-EIGHT THROUGH THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 12 through 19, and Overt Act 3 of Count One are realleged here.
2. Defendant IBRAHIM KAMARA repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.
3. Defendant IBRAHIM KAMARA falsified information about clients' expenses in order to generate, among other things, false education credits, including the Lifetime Learning credit and the American Opportunity credit.
4. Defendant IBRAHIM KAMARA falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.
5. On or about the dates listed below, in Philadelphia in the Eastern District of Pennsylvania, defendant

IBRAHIM KAMARA

willfully aided and assisted in, and procured, counseled and advised the preparation and presentation to the Internal Revenue Service of federal Individual Income Tax Returns, Forms 1040 and Forms 1040A, either individual or joint, for the clients and calendar years listed below, each constituting a separate count, which returns were false and fraudulent as to material matters,

in that they represented that the clients, whose identities are known to the Grand jury, were entitled to claim dependents, deductions and credits, whereas, as IBRAHIM KAMARA well knew, the clients were not entitled to claim such dependents, deductions and credits:

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
28	3/2/2009	2008	I.T.	Filing status, dependent A.E., education expenses for tax filer and dependent.	\$5,176
29	3/30/2010	2009	I.T.	Filing status, dependent J.Z., education expenses for tax filer, child tax credit, child and dependent care expenses.	\$5,981
30	1/31/2011	2010	I.T.	Filing status, dependent J.Z., education expenses for tax filer and dependent, child tax credit, additional child tax credit.	\$6,591
31	2/6/2012	2011	I.T.	Filing status, dependent W.F., education expenses for tax filer and dependent.	\$6,573
32	1/31/2009	2008	A.T	Education credits for tax filer and dependent, child and dependent care expenses.	\$1,805

All in violation of Title 26, United States Code, Section 7206(2).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10, 12 through 19 and Overt Act 3 of Count One are realleged here.

THE SCHEME

2. From in or about January 2009 through in or about April 2012, defendant

IBRAHIM KAMARA

devised and intended to devise a scheme to defraud the IRS, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of that scheme that:

3. Defendant IBRAHIM KAMARA repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.

4. Defendant IBRAHIM KAMARA falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.

5. Defendant IBRAHIM KAMARA charged clients a fee of up to approximately \$800 to include a fraudulent dependent on an income tax return.

6. Defendant IBRAHIM KAMARA submitted, or caused to be submitted, electronically over the internet through the use of TaxWorks software clients' income tax returns

that contained false and fraudulent information. These returns were submitted interstate from the Medmans' offices in Philadelphia to the TaxWorks server in Utah. TaxWorks then submitted the returns in batches to the IRS servers located in Tennessee and West Virginia.

7. On or about the date listed below, in the Eastern District of Pennsylvania, defendant

IBRAHIM KAMARA

for the purpose of executing the scheme described above, and aiding and abetting its execution, knowingly transmitted, or caused to be transmitted, by means of wire communication in interstate commerce the signals and sounds described below:

DATE	DESCRIPTION OF WIRE
1/14/2011	Electronically-filed federal individual income tax return for tax year 2010 of taxpayer A.K. fraudulently claiming dependent J.S.

In violation of Title 18, United States Code, Section 1343.

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

5. Paragraphs 1 through 10, 12 through 19 and Overt Act 3 of Count One, and Paragraphs 3 through 6 of Count Thirty-Three are realleged here.

6. On or about January 15, 2011, in the Eastern District of Pennsylvania,
defendant

IBRAHIM KAMARA

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the name and Social Security number of an individual, J.S., during and in relation to wire fraud, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNTS THIRTY-FIVE THROUGH THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2, and 5 through 8 of Count One are realleged here.
2. Defendant IBRAHIM KAMARA repeatedly falsified information on his personal federal income tax returns, Forms 1040 and 1040A, in order to generate large fraudulent tax refunds.
3. Defendant IBRAHIM KAMARA fraudulently added individuals as dependents on his federal income tax return. By fraudulently adding dependents to his income tax returns, defendant IBRAHIM KAMARA falsely claimed a tax exemption for dependents, the child tax credit, the child and dependent care credit, and the earned income tax credit.
4. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

IBRAHIM KAMARA

willfully made and subscribed federal Individual Income Tax Returns, Forms 1040 and 1040A, for the calendar years listed below, each constituting a separate count, which were verified by a written declaration that they were made under the penalty of perjury, which defendant IBRAHIM KAMARA did not believe to be true and correct as to every material matter, in that the returns represented that IBRAHIM KAMARA was entitled to claim the dependent, deductions and credits listed below, whereas, as IBRAHIM KAMARA well knew, he was not entitled to claim such dependent, deductions and credits:

Count	Date Return Filed	Tax Year	Falsely Claimed Items	Amount of Claimed Refund
35	1/16/2009	2008	Filing status, dependents H.S. and I.S., child tax credit.	\$6,411
36	1/22/2010	2009	Filing status, dependents H.S. and I.S., additional child tax credit, child tax credit, child and dependent care expenses.	\$8,833
37	1/16/2011	2010	Filing status, dependents Z.S. and K.S., additional child tax credit, child tax credit, child and dependent care expenses.	\$9,294
38	1/20/2012	2011	Filing status, dependents Z.S. and K.S., additional child tax credit, child tax credit, child and dependent care expenses.	\$7,253

All in violation of Title 26, United States Code, Section 7206(1).

COUNTS THIRTY-NINE THROUGH FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 12 through 19, and Overt Act 4 of Count One are realleged here.

2. Defendant DAUDA KOROMA repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.

3. Defendant DAUDA KOROMA falsified information about clients' expenses in order to generate, among other things, false education credits, including the Lifetime Learning credit and the American Opportunity credit.

4. Defendant DAUDA KOROMA falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.

5. On or about the dates listed below, in Philadelphia in the Eastern District of Pennsylvania, defendant

DAUDA KOROMA

willfully aided and assisted in, and procured, counseled and advised the preparation and presentation to the Internal Revenue Service of federal Individual Income Tax Returns, Forms 1040 and Forms 1040A, either individual or joint, for the clients and calendar years listed below, each constituting a separate count, which returns were false and fraudulent as to material matters,

in that they represented that the clients, whose identities are known to the Grand jury, were entitled to claim dependents, deductions and credits, whereas, as DAUDA KOROMA well knew, the clients were not entitled to claim such dependents, deductions and credits:

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
39	1/14/2010	2009	D.K.	Dependents C.D. and Q.R., charitable contribution, child tax credit, child and dependent care expenses.	\$7,698
40	1/18/2011	2010	D.K.	Education expenses for tax filer's wife and dependent.	\$8,746
41	4/11/2011	2010	D.J.	Education credit for tax filer.	\$2,163
42	1/20/2010	2009	J.D.	Filing status, dependent K.D. additional child tax credit, education credit for tax filer and dependent, earned income tax credit.	\$4,330
43	2/8/2012	2011	J.D.	Filing status, dependent D.S. additional child tax credit, education credit for dependent, earned income tax credit.	\$5,696
44	2/8/2013	2012	J.D.	Filing status, dependent C.P. child tax credit, additional child tax credit, earned income tax credit.	\$4,858
45	1/20/2010	2009	C.F.	Filing status, dependent Z.M., earned income tax credit, additional child and tax credit, child and dependent care expenses.	\$5,697

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
46	2/8/2011	2010	C.F.	Filing status, dependent A.W., earned income tax credit, additional child and tax credit, education credit for dependent.	\$5,764
47	1/25/2012	2011	C.F.	Filing status, dependent J.K., earned income tax credit, additional child and tax credit.	\$5,860

All in violation of Title 26, United States Code, Section 7206(2).

COUNT FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10, 12 through 19 and Overt Act 4 of Count One are realleged here.

THE SCHEME

2. From in or about January 2009 through in or about April 2013, defendant

DAUDA KOROMA

devised and intended to devise a scheme to defraud the IRS, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of that scheme that:

3. Defendant DAUDA KOROMA repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.

4. Defendant DAUDA KOROMA falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.

5. Defendant DAUDA KOROMA charged clients a fee of up to approximately \$800 to include a fraudulent dependent on an income tax return.

6. Defendant DAUDA KOROMA submitted, or caused to be submitted, electronically over the internet through the use of TaxWorks software clients' income tax returns

that contained false and fraudulent information. These returns were submitted interstate from the Medmans' offices in Philadelphia to the TaxWorks server in Utah. TaxWorks then submitted the returns in batches to the IRS servers located in Tennessee and West Virginia.

7. On or about the date listed below, in the Eastern District of Pennsylvania, defendant

DAUDA KOROMA

for the purpose of executing the scheme described above, and aiding and abetting its execution, knowingly transmitted, or caused to be transmitted, by means of wire communication in interstate commerce the signals and sounds described below:

DATE	DESCRIPTION OF WIRE
2/8/2013	Electronically-filed federal individual income tax return for tax year 2012 of taxpayer J.D. fraudulently claiming dependent C.P.

In violation of Title 18, United States Code, Section 1343.

COUNT FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

7. Paragraphs 1 through 10, 12 through 19 and Overt Act 2 of Count One, and Paragraphs 3 through 6 of Count Forty-Eight are realleged here.

8. On or about February 8, 2013, in the Eastern District of Pennsylvania,
defendant

DAUDA KOROMA

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the name and Social Security number of an individual, C.P., during and in relation to wire fraud, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNTS FIFTY THROUGH FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 12 through 19, and Overt Act 5 of Count One are realleged here.
2. Defendant FODAY MANSARAY repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.
3. Defendant FODAY MANSARAY falsified information about clients' expenses in order to generate, among other things, false education credits, including the Lifetime Learning credit and the American Opportunity credit.
4. Defendant FODAY MANSARAY falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.
5. On or about the dates listed below, in Philadelphia in the Eastern District of Pennsylvania, defendant

FODAY MANSARAY

willfully aided and assisted in, and procured, counseled and advised the preparation and presentation to the Internal Revenue Service of federal Individual Income Tax Returns, Forms 1040 and Forms 1040A, either individual or joint, for the clients and calendar years listed below, each constituting a separate count, which returns were false and fraudulent as to material matters,

in that they represented that the clients, whose identities are known to the Grand jury, were entitled to claim dependents, deductions and credits, whereas, as FODAY MANSARAY well knew, the clients were not entitled to claim such dependents, deductions and credits:

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
50	1/2/2009	2008	I.T	Filing status, dependents D.P. and S.G., education credit for one false dependent, child tax credit.	\$6,896
51	1/18/2010	2009	I.T.	Filing status, false dependents S.G. and N.G., education credit for one false dependent, child tax credit.	\$8,777
52	1/30/2011	2010	I.T.	Filing status, false dependents S.G. and N.G., education credit for tax filer, child tax credit.	\$7,318
53	2/16/2012	2011	I.T.	Filing status, false dependent A.B., child tax credit.	\$5,860

All in violation of Title 26, United States Code, Section 7206(2).

COUNT FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10, 12 through 19 and Overt Act 5 of Count One are realleged here.

THE SCHEME

2. From in or about January 2009 through in or about April 2012, defendant

FODAY MANSARAY

devised and intended to devise a scheme to defraud the IRS, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of that scheme that:

3. Defendant FODAY MANSARAY repeatedly falsified information on federal income tax returns that he prepared and electronically filed for clients in order to generate large fraudulent tax refunds.

4. Defendant FODAY MANSARAY falsified information about clients' dependents, and added dependents on the returns of clients who otherwise had no legitimate dependent to claim, in order to falsely claim a tax exemption for each dependent, the child tax credit, the child and dependent care credit, the earned income tax credit, and education credits for the dependents.

5. Defendant FODAY MANSARAY charged clients a fee of up to approximately \$800 to include a fraudulent dependent on an income tax return.

6. Defendant FODAY MANSARAY submitted, or caused to be submitted, electronically over the internet through the use of TaxWorks software clients' income tax returns

that contained false and fraudulent information. These returns were submitted interstate from the Medmans' offices in Philadelphia to the TaxWorks server in Utah. TaxWorks then submitted the returns in batches to the IRS servers located in Tennessee and West Virginia.

7. On or about the date listed below, in the Eastern District of Pennsylvania, defendant

FODAY MANSARAY

for the purpose of executing the scheme described above, and aiding and abetting its execution, knowingly transmitted, or caused to be transmitted, by means of wire communication in interstate commerce the signals and sounds described below:

DATE	DESCRIPTION OF WIRE
1/18/2010	Electronically-filed federal individual income tax return for tax year 2009 of taxpayer I.T. fraudulently claiming dependents S.G. and N.G.

In violation of Title 18, United States Code, Section 1343.

COUNT FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10, 12 through 19 and Overt Act 5 of Count One, and Paragraphs 3 through 6 of Count Fifty-Four are realleged here.

2. On or about January 18, 2010, in the Eastern District of Pennsylvania,
defendant

FODAY MANSARAY

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the names and Social Security numbers of two individuals, S.G. and N.G., during and in relation to wire fraud, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNTS FIFTY-SIX THROUGH FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2, and 5 through 8 of Count One are realleged here.
2. Defendant FODAY MANSARAY repeatedly falsified information on his personal federal income tax returns, Forms 1040 and 1040A, in order to generate large fraudulent tax refunds.
3. Defendant FODAY MANSARAY fraudulently added individuals as dependents on his federal income tax return. By fraudulently adding dependents to his income tax returns, defendant FODAY MANSARAY falsely claimed a tax exemption for dependents, the child tax credit, the child and dependent care credit, and the earned income tax credit.
4. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

FODAY MANSARAY

willfully made and subscribed federal Individual Income Tax Returns, Forms 1040 and 1040A, for the calendar years listed below, each constituting a separate count, which were verified by a written declaration that they were made under the penalty of perjury, which defendant FODAY MANSARAY did not believe to be true and correct as to every material matter, in that the returns represented that FODAY MANSARAY was entitled to claim the dependent, deductions and credits listed below, whereas, as FODAY MANSARAY well knew, he was not entitled to claim such dependent, deductions and credits:

Count	Date Return Filed	Tax Year	Falsely Claimed Items	Amount of Claimed Refund
56	2/19/2009	2008	Filing status, dependents C.K. and J.S., child tax credit, education credit.	\$5,233
57	2/17/2012	2011	Filing status, dependents T.C. and C.C., child tax credit, additional child tax credit, earned income tax credit.	\$8,071

All in violation of Title 26, United States Code, Section 7206(1).

COUNTS FIFTY-EIGHT THROUGH SIXTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 12 through 19, and Overt Acts 1 through 5 of Count One are realleged here.

2. Defendant GEBAH KAMARA obtained and sold the personal identity information of CSS foster children to Mohamed Mansaray and defendant AHMED KAMARA for use as fraudulent dependents in federal individual income tax returns.

3. Defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY, and other tax preparers, used the CSS foster children's personal identity information provided by defendant GEBAH KAMARA to create false dependents on federal income tax returns that were electronically filed with the IRS.

4. On or about the dates listed below, in Philadelphia in the Eastern District of Pennsylvania, defendant

GEBAH KAMARA

willfully aided and assisted in the preparation and presentation to the Internal Revenue Service of federal individual income tax returns, Forms 1040 and 1040A, for the taxpayers and calendar years listed below, which returns were false and fraudulent as to material matters, in that they falsely represented that the taxpayers, whose identities are known to the Grand jury, were entitled to claim the dependents, deductions, and credits listed below:

Count	Date Return Filed	Tax Year	Tax Filer	Falsely Claimed Items	Amount of Claimed Refund
58	1/16/2009	2008	J.C.	Dependents A.C.1 and A.C.2, additional child tax credit, earned income tax credit.	\$5,865
59	1/14/2010	2009	D.K.	Dependents C.D. and Q.R., charitable contribution, child tax credit, child and dependent care expenses.	\$7,698
60	1/18/2010	2009	I.T.	Filing status, false dependents S.G. and N.G., education credit for one false dependent, child tax credit.	\$8,777
61	2/3/2010	2009	E.M.	Filing status, dependent T.B., education credit for tax filer, earned income tax credit, additional child tax credit.	\$7,348
62	1/15/2011	2010	A.T.	Filing status, dependent Q.P. education credits for false dependent, earned income tax credit, additional child tax credit.	\$8,576
63	1/15/2011	2010	A.K.	Filing status, dependent J.S., child tax credit, child and dependent care expenses, education credit for tax filer's spouse.	\$9,522

All in violation of Title 26, United States Code, Section 7206(2).

COUNT SIXTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 10 through 17, and Overt Acts 1 through 5 of Count One are realleged here.

THE SCHEME

2. From in or about January 2009 through in or about April 2011, defendant

GEBAH KAMARA

devised and intended to devise a scheme to defraud the IRS, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of that scheme that:

3. Defendant GEBAH KAMARA agreed to participate in, and did participate in, a scheme to obtain large fraudulent refunds from the IRS through the filing of false federal income tax returns by providing the personal identity information of CSS foster children to fraudulently be used as dependents on income tax returns.

4. Defendant GEBAH KAMARA misappropriated the personal identity information of numerous CSS foster children, and sold that information to Mohamed Mansaray and defendant AHMED KAMARA.

5. Mohamed Mansaray and defendants AHMED KAMARA, MUSA TURAY, IBRAHIM KAMARA, DAUDA KOROMA, and FODAY MANSARAY used the personal identity information of the CSS foster children provided by defendant GEBAH KAMARA to prepare false federal income tax returns and generate large fraudulent refunds for clients.

8. The fraudulent federal income tax returns that contained the CSS foster children's personal identity information were submitted from the Medmans' offices in Philadelphia electronically over the internet to the IRS through the use of TaxWorks software. TaxWorks then submitted the returns in batches from its server in Utah to the IRS servers located in Tennessee and West Virginia.

9. On or about each of the dates listed below, in the Eastern District of Pennsylvania, defendant

GEBAH KAMARA,

for the purpose of executing the scheme described above, and aiding and abetting its execution, knowingly transmitted, or caused to be transmitted, by means of wire communication in interstate commerce the signals and sounds described below:

DATE	DESCRIPTION OF WIRE
1/14/2010	Electronically-filed federal individual income tax return for tax year 2009 of taxpayer D.K. fraudulently claiming dependents C.D. and Q.R.

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

COUNT SIXTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8, 10 through 17, and Overt Acts 1 through 5 of Count One, and Paragraphs 3 through 6 of Count Sixty-Four are realleged here.

2. On or about January 14, 2010, in the Eastern District of Pennsylvania, defendant

GRBAH KAMARA

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the names and Social Security numbers of two individuals, C.D. and Q.R., during and in relation to wire fraud, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343 described in this indictment, defendants

**AHMED KAMARA,
MUSA TURAY,
GEBAH KAMARA,
IBRAHIM KAMARA,
DAUDA KOROMA, and
FODAY MANSARAY**

shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to violations, including, but not limited to the sum of up to \$6 million.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

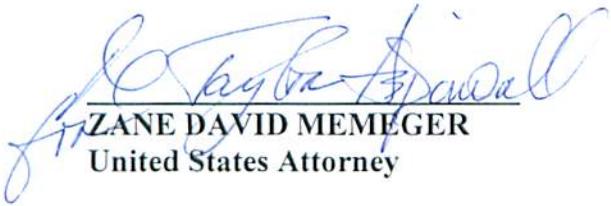
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28,
United States Code, Section 2461(c).

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
United States Attorney