

1 MELINDA HAAG (CABN 132612)
United States Attorney

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,)	No.
12 Plaintiff,)	
13 v.)	VIOLATIONS: 18 U.S.C. § 641–Theft
14 SHERRY L. HENDER,)	of Government Property; 18 U.S.C. §
15 Defendant.)	1028A–Aggravated Identity Theft
)	OAKLAND VENUE

16
17 INDICTMENT

18 The Grand Jury Charges:

19 COUNTS ONE THROUGH SEVENTEEN: (18 U.S.C. § 641 – Theft of Government
20 Property)

21 From on or about January 18, 2012, to February 21, 2012, within the Northern
22 District of California and elsewhere, the defendant,

23 SHERRY L. HENDER,

24 did knowingly and willfully (1) embezzle, steal, purloin, and convert to her own use
25 things of value of the United States and a department and agency thereof, namely United
26 States Treasury tax refunds of a value in excess of \$1,000 to which she was not
27 entitled, and did (2) receive, conceal, and retain the same with the intent to convert it to
28 her use and gain, knowing it to have been embezzled, stolen, purloined, and converted:

Count	Taxpayer	Tax Return Year	Amount
1	A. W.	2011	\$4,908
2	A. M.	2011	\$1,464
3	B. B.	2011	\$5,094
4	D. L.	2011	\$1000
5	D. B.	2011	\$3,094
6	J. M.	2011	\$1,464
7	K. M.	2011	\$4,094
8	M. C.	2011	\$1,000
9	M. S.	2011	\$1,464
10	M. L.	2011	\$1,464
11	P. B.	2011	\$1,464
12	R. M.	2011	\$8,446
13	R. W.	2011	\$1,464
14	S. L.	2011	\$1,000
15	T. C.	2011	\$7,105
16	T. B.	2011	\$1,464
17	Y. J.	2011	\$1,000
Total			\$46,989

All in violation of Title 18, United States Code, Section 641.

COUNTS EIGHTEEN: (18 U.S.C. § 1028A – Aggravated Identity Theft)

On or about January 18, 2012, within the Northern District of California, the defendant,

SHERRY L. HENDER,

knowingly transferred, possessed, and used without lawful authority a means of identification of another person during and in relation to a violation of Title 18, United States Code Section 641, as stated in Count 3 of this Indictment, that is, she knowingly

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1 transferred, possessed and used the name and Social Security number of B.B. to violate 18,
2 United States Code Section 641.

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

4 A True Bill

5 Dated: _____
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FOREPERSON _____

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8 MELINDA HAAG
United States Attorney

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MIRANDA KANE
Chief, Criminal Section

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12 Approved as to Form

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THOMAS MOORE
Assistant United States Attorney
15 Chief, Tax Division

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