

Betty

United States District Court
Northern District of California

CRIMINAL COVER SHEET

FILED
2013 AUG 20 P 2:00
RICHARD W. WIEKING
CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JST

Instructions: Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

Case Name:

USA v. Jessika Green, Khyber Law and Starkisha Benson

Case Number:

CR 13 560

Total Number of Defendants:

1 2-7 8 or more

Is This Case Under Seal?

Yes No

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes No

Venue (Per Crim. L.R. 18-1):

SF OAK SJ EUR MON

Is any defendant charged with a death-penalty-eligible crime?

Yes No

Assigned AUSA (Lead Attorney):

THOMAS NEWMAN, AUSA

Is this a RICO Act gang case?

Yes No

Date Submitted:

8/20/13

Comments:

Save Print Clear Form

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 286 - Conspiracy to File False Claims; 18 U.S.C. § 1343 - Wire Fraud; 18 U.S.C. § 641 - Theft of Public Money; 18 U.S.C. § 287 - Filing False Claims; 18 U.S.C. § 1028A - Aaarvated Identity Theft

Petty Minor Misdemeanor Felony

PENALTY:

PLEASE SEE ATTACHMENT

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

INTERNAL REVENUE SERVICE

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM MELINDA HAAG

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) THOMAS NEWMAN, AUSA, Tax Division

Name of District Court, and/or Judge/Magistrate Location NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

DEFENDANT - U.S.

JESSIKA GREEN

DISTRICT COURT NUMBER

FILED

2013 AUG 20 P 2:19

RICHARD W. WIEKING DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

JST

CR 13 560

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
5) On another conviction
6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: _____

If Summons, complete following:

Arralgnment Initial Appearance

Defendant Address: _____

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments:

[Redacted]

Attachment to Indictment Penalty Sheet
JESSIKA GREEN

FILED

2013 AUG 20 P 2:19

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JST

18 U.S.C. § 286 - Conspiracy to File False Claims

- 10 years prison
- \$250,000 fine
- 3 years supervised release
- \$100 special assessment

18 U.S.C. § 1343 - Wire Fraud

- 20 years prison
- \$250,000 fine
- 5 years supervised release
- \$100 special assessment

CR 13 560

18 U.S.C. § 641 - Theft of Public Money

- 10 years prison
- \$ 250,000 fine
- 3 year supervised release
- \$100 special assessment

18 U.S.C. § 287 - Filing False Claims

- 5 years prison
- \$250,000 fine
- 3 years supervised release
- \$100 special assessment

18 U.S.C. § 1028A - Aggravated Identity Theft

- 2 years prison, consecutive to underlying felony
- \$250,000 fine
- 2 years supervised release
- \$100 special assessment

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Petty Minor Misdemeanor Felony

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Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

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SHOW DOCKET NO.

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prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on THIS FORM MELINDA HAAG

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) THOMAS NEWMAN, AUSA, Tax Division

Name of District Court, and/or Judge/Magistrate Location NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

DEFENDANT - U.S.

KHYBER LAW

DISTRICT COURT NUMBER

CR 13 560

FILED 2013 AUG 20 P 2 JUST CLERK OF U.S. DISTRICT COURT RICHARD W. WIEKING

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
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IS IN CUSTODY

- 4) On this charge
5) On another conviction
6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes", show name of institution

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Defendant Address:

Date/Time:

Before Judge:

Comments:

[Redacted comment box]

Attachment to Indictment Penalty Sheet
KHYBER LAW

18 U.S.C. § 286 - Conspiracy to File False Claims

- 10 years prison
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- 3 years supervised release
- \$100 special assessment

18 U.S.C. § 1343 - Wire Fraud

- 20 years prison
- \$250,000 fine
- 5 years supervised release
- \$100 special assessment

18 U.S.C. § 287 - Filing False Claims

- 5 years prison
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18 U.S.C. § 1028A - Aggravated Identity Theft

- 2 years prison, consecutive to underlying felony
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- \$100 special assessment

CR 13 560

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2013 AUG 20 P 2:19
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIF.
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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

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18 U.S.C. § 286 - Conspiracy to File False Claims; 18 U.S.C. § 1343 - Wire Fraud; 18 U.S.C. § 641 - Theft of Public Money; 18 U.S.C. § 1028A - Aggravated Identity Theft; 18 U.S.C. § 1029(a)(5)

Petty Minor Misdemeanor Felony

PENALTY:

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person is awaiting trial in another Federal or State Court, give name of court

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MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

MELINDA HAAG U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) THOMAS NEWMAN, AUSA, Tax Division

Name of District Court, and/or Judge/Magistrate Location NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

DEFENDANT - U.S.

STARKISHA BENSON

DISTRICT COURT NUMBER

CR 13 560

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
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IS IN CUSTODY

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5) On another conviction
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This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

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Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

Attachment to Indictment Penalty Sheet
STARKISHA BENSON

FILED

2013 AUG 20 P 2:19

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

18 U.S.C. § 286 - Conspiracy to File False Claims

- 10 years prison
- \$250,000 fine
- 3 years supervised release
- \$100 special assessment

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18 U.S.C. § 1343 - Wire Fraud

- 20 years prison
- \$250,000 fine
- 5 years supervised release
- \$100 special assessment

18 U.S.C. § 641 - Theft of Public Money

- 10 years prison
- \$ 250,000 fine
- 3 year supervised release
- \$100 special assessment

18 U.S.C. § 1028A - Aggravated Identity Theft

- 2 years prison, consecutive to underlying felony
- \$250,000 fine
- 2 years supervised release
- \$100 special assessment

18 U.S.C. § 1029(a)(5) - Effecting Fraudulent Transactions with Access Device

- 15 years prison
- \$250,000 fine
- 3 years supervised release
- \$100 special assessment

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED
2013 AUG 20 P 2:19
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JST

UNITED STATES OF AMERICA,

v.

CR 13 560

JESSIKA GREEN, KHYBER LAW and
STARKISHA BENSON

DEFENDANT(S).

INDICTMENT

- 18 U.S.C. § 1343 - Wire Fraud
- 18 U.S.C. § 286 - Conspiracy to File False Claims
- 18 U.S.C. § 287 - Filing False Claims
- 18 U.S.C. § 1029(a)(5) - Effecting Fraudulent Transactions with
Access Device
- 18 U.S.C. § 641 - Theft of Public Money
- 18 U.S.C. § 1028A - Aggravated Identity Theft

A true bill.

[Signature]

Foreman

Filed in open court this 20 day of

Aug 2013

[Signature]

Clerk

Bail, \$ no process needed

[Signature]

Nathanael Cousins
United States Magistrate Judge

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MELINDA HAAG (CABN 132612)
United States Attorney

FILED
2013 AUG 20 P 2:19
RICHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JST

OAKLAND DIVISION **CR 13 560**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JESSIKA GREEN,
KHYBER LAW, and
STARKISHA BENSON,
Defendants.

No. CR-
VIOLATIONS: 18 U.S.C. § 1343 – Wire
Fraud; 18 U.S.C. § 286 – Conspiracy to File
False Claims; 18 U.S.C. § 287 – Filing False
Claims; 18 U.S.C. § 1029(a)(5) – Effecting
Fraudulent Transactions with Access
Device; 18 U.S.C. § 641 – Theft of Public
Money; and 18 U.S.C. § 1028A –
Aggravated Identity Theft
OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. JESSIKA GREEN (hereinafter GREEN), resided in Oakley, California, at all relevant times.
2. KHYBER LAW (hereinafter LAW), resided at various addresses in Berkeley, California, and elsewhere in the Northern District of California at all relevant times.
3. STARKISHA BENSON (hereinafter BENSON), resided in Antioch, California, at all relevant times.
4. A “means of identification” includes any name or number that may be used, alone

INDICTMENT

1 or in conjunction with other information, to identify a specific individual, including a name,
2 Social Security number, or date of birth.

3 5. A "prepaid debit card" is a card linked to an account at a financial institution that
4 can be used to receive deposits electronically, like a traditional bank account, and can be used to
5 make purchases and cash withdrawals with funds in the account, like a traditional debit card.

6 6. An "access device" means any card, plate, code, account number, electronic serial
7 number, mobile identification number, personal identification number, or other
8 telecommunications service, equipment, or instrument identifier, or other means of account
9 access that can be used, alone or in conjunction with another access device, to obtain money,
10 goods, services, or any other thing of value, or that can be used to initiate a transfer of funds
11 (other than a transfer originated solely by paper instrument).

12 7. The amount of tax that is reported as "withheld" on a federal income tax return is
13 the amount of income tax that employers are required to deduct from employees' wages pursuant
14 to 26 U.S.C. § 3402.

15 8. The Internal Revenue Service ("IRS") is an agency of the United States within the
16 Department of the Treasury of the United States responsible for enforcing and administering the
17 tax laws of the United States.

18 9. The electronically filed federal income tax returns identified below were
19 transmitted to the IRS's transmission centers located in either Memphis, Tennessee, or in
20 Martinsburg, West Virginia.

21 COUNT ONE: (18 U.S.C. § 286 - Conspiracy to File False Claims)

22 10. Beginning in or about January 2011, and continuing until in or about April 2011,
23 within the Northern District of California and elsewhere,

24 JESSIKA GREEN,
25 KHYBER LAW,
26 STARKISHA BENSON,

27 and others, both known and unknown to the grand jury, entered into an agreement, combination
28 and conspiracy with others and each other to defraud the IRS, an agency of the United States, by
obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent

1 claims.

2 MANNER AND MEANS OF THE CONSPIRACY
3 AND THE SCHEME TO DEFRAUD

4 11. GREEN, LAW, BENSON, and others, both known and unknown to the Grand
5 Jury, filed, or helped others file, false claims with the IRS requesting refunds in the names of
6 others.

7 12. As part of the scheme, GREEN, LAW, BENSON, and their co-conspirators
8 procured the names and identities of individual taxpayers, through illegal means or by agreement
9 with participants in the scheme.

10 13. GREEN, LAW, and BENSON electronically filed with the IRS, or assisted in
11 filing with the IRS, false federal income tax returns using the identities obtained as part of the
12 scheme.

13 14. The tax returns that GREEN, LAW, and BENSON filed, or assisted in filing,
14 falsely claim that the individuals listed on the returns earned wages in amounts specified on a
15 fictitious Form W-2 that was filed with the tax return.

16 15. As part of the scheme, GREEN and LAW or their co-conspirators recorded the
17 names and other personal identifying information used in the scheme in notebooks along with
18 various employers' information used to create fictitious Forms W-2.

19 16. The false federal income tax returns filed by GREEN, LAW, and their co-
20 conspirators requested refunds, including claims for withheld taxes, from the IRS to which the
21 taxpayers listed on the federal income tax returns were not entitled.

22 17. As part of the scheme, GREEN, LAW, BENSON, and their co-conspirators
23 requested that the IRS transmit the fraudulent refunds into accounts linked to debit cards used to
24 access the proceeds derived from the conspiracy.

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

26 COUNTS TWO THROUGH THREE: (18 U.S.C. § 1343 and § 2(b) – Wire Fraud)

27 18. Paragraphs 1 through 17 above are realleged and by this reference fully
28 incorporated herein.

1 19. On or about the dates listed below, in the Northern District of California and
2 elsewhere, the defendants,

3 JESSIKA GREEN, and
4 STARKISHA BENSON,

5 did knowingly and intentionally devise a material scheme and artifice to defraud, and to obtain
6 money, by means of material false and fraudulent pretenses, and representations made on false
7 claims filed with the IRS, and for the purpose of executing such scheme and artifice did transmit
8 and cause to be transmitted, by means of wire communications in interstate commerce, certain
9 writings, signs, signals, and sounds, including the interstate wires transmitting false federal
10 income tax returns as described below:

Count	Date of Filing	Amount of Requested Wire Payment	Initials of Individual Listed on False Claim
2	4/18/2011	\$2,727	D.A.
3	4/18/2011	\$2,609	P.L.

11 All in violation of Title 18, United States Code, Sections 1343 and 2.

12 COUNTS FOUR THROUGH FIVE: (18 U.S.C. § 1343 and § 2(b) – Wire Fraud)

13 20. Paragraphs 1 through 17 above are realleged and by this reference fully
14 incorporated herein.

15 21. On or about the dates listed below, in the Northern District of California and
16 elsewhere, the defendants,

17 JESSIKA GREEN, and
18 KHYBER LAW,

19 did knowingly and intentionally devise a material scheme and artifice to defraud, and to obtain
20 money, by means of material false and fraudulent pretenses, and representations made on false
21 claims filed with the IRS, and for the purpose of executing such scheme and artifice did transmit
22 and cause to be transmitted, by means of wire communications in interstate commerce, certain
23 writings, signs, signals, and sounds, including the interstate wires transmitting false federal
24 income tax returns as described below:
25
26
27
28

Count	Date of Filing	Amount of Requested Wire Payment	Initials of Individual Listed on False Claim
4	3/08/2011	\$2,500	D.W.
5	3/01/2011	\$3,837	L.M.

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

COUNTS SIX THROUGH SEVEN: (18 U.S.C. § 641 and § 2(b) – Theft of Government Property)

22. On or about the dates listed below, in the Northern District of California and elsewhere, the defendant,

JESSIKA GREEN, and
STARKISHA BENSON,

did knowingly and willfully (1) embezzle, steal, purloin, and convert to GREEN's and BENSON's own use things of value of the United States and a department and agency thereof, namely United States Treasury tax refunds of a value in excess of \$1,000 to which GREEN and BENSON were not entitled, and did (2) receive, conceal, and retain the same with the intent to convert it to her use and gain, knowing it to have been embezzled, stolen, and purloined in the names of the individuals with the initials listed as follows:

Count	Date of Filing	Amount of Deposit Requested	Initials of Individual Listed on Claim
6	4/18/2011	\$2,727	D.A.
7	4/18/2011	\$2,609	P.L.

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNTS EIGHT THROUGH ELEVEN: (18 U.S.C. § 287 – False Claims)

23. Paragraphs 1 through 17 above are realleged and by this reference fully incorporated herein.

24. On or about the date listed below, in the Northern District of California, the defendant,

JESSIKA GREEN,

1 made and presented to the United States Treasury Department a claim against the United States
 2 for payment of a refund of taxes, which she then and there knew to be false, fictitious, and
 3 fraudulent. GREEN made the claims by preparing and causing to be prepared, false 2010 U.S.
 4 Individual Income Tax Returns, Forms 1040, which were presented to the United States Treasury
 5 Department, through the IRS as follows:

Count	Date of Filing	Amount of Claim	Initials of Individual Listed on False Claim
8	1/19/2011	\$8,599	J.G.
9	1/19/2011	\$5,720	K.L.
10	4/18/2011	\$2,727	D.A.
11	4/18/2011	\$2,609	P.L.

12 All in violation of Title 18, United States Code, Section 287.

13 COUNTS TWELVE THROUGH FOURTEEN: (18 U.S.C. § 1029(a)(5), (b)(1) – Effecting
 14 Fraudulent Transactions with Access Device)

15 25. On or about the dates listed below, in the Northern District of California and
 16 elsewhere, the defendant,

17 STARKISHA BENSON,

18 did knowingly and with intent to defraud, effect, and attempt to effect transactions, that affected
 19 interstate commerce, with one or more access devices issued to another person or persons, to
 20 receive payment and any other thing of value during any one-year period, the aggregate value was
 21 at least \$1,000, namely a prepaid Green Dot bank card issued in the name of the individuals with
 22 the initials listed below:

Count	Date Card Was Issued	Deposit Requested Onto Card	Initials of Individual Listed on Card
12	4/18/2011	\$2,727	D.A.
13	4/18/2011	\$2,609	P.L.
14	8/10/2011	\$4,934	S.H.

28 All in violation of Title 18, United States Code, Section 1029(a)(5), (b)(1).

1 COUNT FIFTEEN: (18 U.S.C. § 1028A – Aggravated Identity Theft)

2 26. On or about April 18, 2011, in the Northern District of California, the defendant,
3 STARKISHA BENSON,
4 did knowingly possess and use, without lawful authority, a means of identification of another
5 person, specifically, P.L.'s name and Social Security number, during and in relation to a felony
6 violation of Title 18, United States Code, Section 641.

7 All in violation of Title 18, United States Code, Section 1028A(a)(1).

8 COUNT SIXTEEN: (18 U.S.C. § 1028A – Aggravated Identity Theft)

9 27. On or about April 18, 2011, in the Northern District of California, the defendant,
10 STARKISHA BENSON,
11 did knowingly possess and use, without lawful authority, a means of identification of another
12 person, specifically, D.A.'s name and Social Security number, during and in relation to a felony
13 violation of Title 18, United States Code, Section 641.

14 All in violation of Title 18, United States Code, Section 1028A(a)(1).

15 COUNT SEVENTEEN: (18 U.S.C. § 1028A – Aggravated Identity Theft)

16 28. On or about August 10, 2011, in the Northern District of California, the
17 defendant,

18 STARKISHA BENSON,

19 did knowingly possess and use, without lawful authority, a means of identification of another
20 person, specifically, S.H.'s name and Social Security number, during and in relation to a felony
21 violation of Title 18, United States Code, Section 641.

22 All in violation of Title 18, United States Code, Section 1028A(a)(1).

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

24 29. On or about April 18, 2011, in the Northern District of California, the defendant,
25 JESSIKA GREEN,
26 did knowingly possess and use, without lawful authority, a means of identification of another
27 person, specifically, P.L.'s name and Social Security number, during and in relation to a felony
28 violation of Title 18, United States Code, Section 1343.

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

2 COUNT NINETEEN: (18 U.S.C. § 1028A – Aggravated Identity Theft)

3 30. On or about April 18, 2011, in the Northern District of California, the defendant,

4 JESSIKA GREEN,

5 did knowingly possess and use, without lawful authority, a means of identification of another
6 person, specifically, D.A.'s name and Social Security number, during and in relation to a felony
7 violation of Title 18, United States Code, Section 1343.

8 All in violation of Title 18, United States Code, Section 1028A(a)(1).

9 COUNT TWENTY: (18 U.S.C. § 1028A – Aggravated Identity Theft)

10 31. On or about August 10, 2011, in the Northern District of California, the
11 defendant,

12 JESSIKA GREEN,

13 did knowingly possess and use, without lawful authority, a means of identification of another
14 person, specifically, S.H.'s name and Social Security number, during and in relation to a felony
15 violation of Title 18, United States Code, Section 1343.

16 All in violation of Title 18, United States Code, Section 1028A(a)(1).

17 COUNT TWENTY-ONE: (18 U.S.C. § 1028A – Aggravated Identity Theft)

18 32. On or about March 10, 2011, in the Northern District of California, the defendant,

19 KHYBER LAW,

20 did knowingly possess and use, without lawful authority, a means of identification of another
21 person, specifically, T.L.'s name and Social Security number, during and in relation to a felony
22 violation of Title 18, United States Code, Section 1343.

23 All in violation of Title 18, United States Code, Section 1028A(a)(1).

24 COUNT TWENTY-TWO: (18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

25 33. On or about March 8, 2011, in the Northern District of California, the defendant,

26 KHYBER LAW,

27 did knowingly possess and use, without lawful authority, a means of identification of another
28 person, specifically, D.W.'s name and Social Security number, during and in relation to a felony

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

2 All in violation of Title 18, United States Code, Section 1028A(a)(1).

3 A True Bill

4 Dated: 8-20-13

J. Schun
FOREPERSON

5
6 MELINDA HAAG
United States Attorney

7
8 J. Douglas Wilson
9 J. DOUGLAS WILSON
Chief, Criminal Section

10
11 Approved as to Form:

12 Tom Newman
13 THOMAS M. NEWMAN
Assistant United States Attorney
14 Tax Division

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