

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

TAKABVAKO CHIWOCHA-CROWELL,

**INDICTMENT**

Defendant.

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The Grand Jury charges:

**(Conspiracy to Defraud the Government by False Claims)**

That from January 2011 to October 2011, in Ingham County, in the Southern Division of the Western District of Michigan, and other places,

**TAKABVAKO CHIWOCHA-CROWELL,**

defendant, did conspire, agree and combine with other persons, to defraud the United States to knowingly obtain and aid in obtaining the payment of false, fictitious and fraudulent claims.

In particular, defendant CHIWOCHA-CROWELL set up a company named Immediate Human Services LLC, with a registered address in Okemos, Michigan, which she represented to be a tax return preparation service. CHIWOCHA-CROWELL solicited individuals at various locations, including homeless shelters and soup kitchens, offering to get these individuals income tax refunds though they had little or no income. CHIWOCHA-CROWELL caused over six hundred false individual federal tax returns, known as IRS Form 1040's, to be filed with the Internal Revenue Service. CHIWOCHA-CROWELL used a family member's rental property located in Lansing, Michigan, as the tax filer's residential address on most of the false tax returns.

The individual federal tax returns contained various forms of false information, including inflated income amounts and non-existent payments in support of falsely-claimed credits.

The false tax returns sought payments from the United States Department of the Treasury in the form of refunds of taxes, with a combined value in excess of \$1,000,000. The Treasury paid over \$600,000 in the form of false individual tax refunds to bank accounts controlled by CHIWOCHA-CROWELL. CHIWOCHA-CROWELL was assisted by other persons, including family members and friends, in the filing of these false individual tax returns.

CHIWOCHA-CROWELL kept the majority of the false tax refund payments for her own benefit and enrichment.

**18 U.S.C. § 286**

A TRUE BILL



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GRAND JURY FOREPERSON

PATRICK A. MILES, JR.  
United States Attorney



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MICHAEL A. MACDONALD  
Assistant United States Attorney