

22

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:2:19-cr-20128  
Judge: Friedman, Bernard A.  
MJ: Whalen, R. Steven  
Filed: 03-07-2019 At 11:55 AM  
INDI USA V. LEE (NA)

VIO: 18 U.S.C. § 1343

D-1 TARA LYNN LEE,

Defendant.

\_\_\_\_\_ /

**INDICTMENT**

THE GRAND JURY CHARGES:

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

1. TARA LYNN LEE, a resident of Macomb County, Michigan, operated under the organization names Always Hope Pregnancy Center L.L.C., Always Hope Pregnancy and Education Center Inc., and TL Pregnancy Services (collectively LEE's companies). LEE matched pregnant women with families seeking to adopt children. LEE received payment from prospective adoptive parents for her services. Couples seeking to adopt also gave LEE money intended to reimburse birth mothers for their expenses.

2. LEE and LEE's companies were not licensed child placing agencies under Michigan law.
3. M.S. and J.S. are residents of Colorado. In 2018, they were interested in adopting a child.
4. M.E. and J.E. are residents of Minnesota. In 2018, they were interested in adopting a child.
5. Jane Doe 1's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 1 was pregnant and due to deliver a baby girl in July 2018.
6. E.T. and C.T. are residents of Georgia. In 2018, they were interested in adopting a child.
7. L.C. and J.C. are residents of Michigan. In 2018, they were interested in adopting a child.
8. M.J. and N.J. are residents of Missouri. In 2018, they were interested in adopting a child.
9. Jane Doe 2 is a resident of Michigan. In 2018, she was pregnant and interested in placing her child into adoption through LEE.
10. C.L. and J.L are residents of South Carolina. In 2018, they were interested in adopting a child.
11. Jane Doe 3 is a resident of Michigan. She was not pregnant in 2018.

12. E.L. and J.L.2 are residents of Indiana. In 2018, they were interested in adopting a child.

13. S.M. and P.M. are residents are Ohio. In 2018, they were interested in adopting a child.

14. Jane Doe 4's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 4 was pregnant and due to deliver a baby boy in December 2018.

15. M.B. and J.B. are residents of Kentucky. In 2018, they were interested in adopting a child.

16. Jane Doe 5's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 5 was pregnant and due to deliver a baby in March 2019.

17. A.P. and C.P are residents of South Carolina. In 2018, they were interested in adopting a child.

18. H.C. and M.C. are residents of Kentucky. In 2018, they were interested in adopting a child.

19. Jane Doe 6 is a resident of Michigan. In 2018, she was pregnant. She met with LEE but decided that she did not want to place her child into adoption.

20. H.B. and J.B.2 are residents of Alabama. In 2018, they were interested in adopting a child.

21. Jane Doe 7's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 7 was pregnant and due to deliver a baby in March 2019.

### **SCHEME TO DEFRAUD**

22. Beginning in approximately 2014 and continuing through approximately November 2018, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE knowingly executed and attempted to execute a scheme to defraud people seeking to adopt children, and to obtain money by means of materially false and fraudulent pretenses, representations and promises.

### **MANNER AND MEANS**

23. Under Michigan law, LEE and LEE's companies were not licensed to facilitate adoptions, place children, or "match" birth mothers with adoptive parents. Yet from 2014 to 2018, LEE repeatedly paired birth mothers with adoptive parents. LEE represented herself to adoptive parents as a legitimate adoption agency.

24. LEE told birth mothers and adoptive families that she was a licensed social worker, and that she would provide birth mothers with counseling and other services during pregnancy and after adoption. LEE does not have a license to practice social work.

25. It was part of the scheme that LEE matched birth mothers and adoptive parents by first sending a description of a pregnant woman to her network of adoption connections. The description, or "opportunity," would include the pregnant

woman's first name and information about her pregnancy. Interested adoptive families responded to LEE, and sent her information about themselves. LEE then informed a set of adoptive parents that the birth mother had selected them, and requested payment.

26. On several occasions, LEE matched more than one set of adoptive parents to a birth mother. In these "double-matches," LEE collected payment from both sets of adoptive parents.

27. Other times, LEE matched adoptive parents with birth mothers that did not exist, were not pregnant, or had not decided to place their child into adoption. For these "fabricated matches," LEE collected payment from prospective adoptive parents.

28. It was part of the scheme that many of the adoptions arranged by LEE failed, either because the pregnancy was not real, the pregnancy had been matched to more than one family, the birth mother was not interested in adoption, or the birth mother changed her mind about adoption. LEE gave false information to adoptive parents when explaining why an adoption had failed.

29. It was part of the scheme that when LEE informed adoptive parents that an adoption had failed, she encouraged them to keep working with her and she quickly presented them with new birth mother opportunities. LEE would offer to "roll over" some of the funds that adoptive parents had paid for the failed adoption to a new

match. In some instances, LEE requested and obtained additional payment for subsequent birth mother matches.

**COUNTS ONE THROUGH THREE**

*Wire Fraud*  
18 U.S.C. § 1343

30. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

31. On or about February 16, 2018, M.S. and J.S. received an Always Hope adoption opportunity for Jane Doe 1. The opportunity included photographs of Jane Doe 1 and her children, and said that she was pregnant with a girl, and that her estimated due date was July 3, 2018. M.S. and J.S. presented their adoptive parent profile to LEE for consideration in the adoption of Jane Doe 1's baby.

32. On or about February 17, 2018, LEE called M.S. and told her that Jane Doe 1 had chosen M.S. and J.S. to adopt her child. On or about February 19, 2018, M.S. and J.S. paid LEE \$19,000 by giving LEE their credit card information over the phone.

33. On or about February 17, 2018, M.E. and J.E. received an Always Hope adoption opportunity for Jane Doe 1. The opportunity was the same one described above in paragraph 31. M.E. and J.E. presented their adoptive parent profile to LEE for consideration in the adoption of Jane Doe 1's baby.

34. On or about February 21, 2018, LEE called M.E. and told her that Jane Doe 1 had chosen M.E. and J.E. to adopt her child. On or about February 21, 2018 and February 23, 2018, M.E. and J.E. paid LEE \$20,000 by giving her their credit card information over the phone.

35. From March to June 2018, LEE communicated with M.S./J.S. and M.E./J.E. through text messages and phone conversations. LEE gave both sets of prospective adoptive parents occasional updates about Jane Doe 1 and her pregnancy.

36. On or about July 1, 2018, LEE called M.E. and J.E. and told them that their adoption had failed because Jane Doe 1 had delivered her baby without telling LEE, and that Jane Doe 1 had decided not to place her child into adoption. LEE presented M.E. and J.E. with other adoption opportunities, and told them that the money they had paid would “roll over” to another adoption.

37. On or about July 1, 2018, M.S. and J.S. left Colorado and began traveling to Michigan. They arrived in Michigan on or about July 3, 2018. On or about July 7, 2018, LEE told M.S. and J.S. that the adoption had failed, and that Jane Doe 1 had decided not to place her baby into adoption. LEE told M.S. and J.S. about another birth mother opportunity.

38. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs,

signals, and sounds described below for each count, each count constituting a separate count of the indictment:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION</b>	<b>TRANSACTION DETAILS</b>
1	2/23/18	Text from LEE to M.S. about Jane Doe 1	Sent from MI (586-839-XXXX) to CO (XXX-X8X-41XX)
2	2/23/18	Text from LEE to M.E. about Jane Doe 1	Sent from MI (586-839-XXXX) to MN (XXX-X2X-68XX)
3	5/10/2018	Video sent via text message from LEE to M.S. showing a pregnant woman's stomach	Sent from MI (586-839-XXXX) to CO (XXX-X8X-41XX)

All in violation of Title 18, United States Code, Section 1343.

### **COUNTS FOUR AND FIVE**

#### *Wire Fraud* 18 U.S.C. § 1343

39. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

40. On or about February 25, 2018, E.T. received an Always Hope adoption opportunity for a birth mother identified as "RaShaunda." The opportunity included a photograph of RaShaunda, and said that she was pregnant with a boy, and that her estimated due date was June 30, 2018. E.T. communicated to LEE that she was interested in the RaShaunda opportunity.



41. On or about February 25, 2018, LEE called E.T. and told her that RaShaunda had chosen E.T. and C.T. to adopt her child. On or about February 26, 2018, E.T. paid LEE \$15,000 by providing her with credit card numbers over the phone.

42. From February to June 2018, LEE communicated with E.T. through text messages and phone conversations. LEE gave E.T. occasional updates about RaShaunda and her pregnancy.

43. On or about June 12, 2018, LEE called E.T. and told her that RaShaunda had been shot and killed and that her baby had died on the way to the hospital.

44. In truth and fact, birth mother RaShaunda did not exist and she was not shot and killed. LEE fabricated RaShaunda and her pregnancy.

45. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION</b>	<b>TRANSACTION DETAILS</b>
4	4/26/18	Ultrasound image sent via text from LEE to E.T.	Sent from MI (586-839-XXXX) to GA (XXX-X6X-56XX)
5	6/2/18	Text from LEE to E.T. about RaShaunda	Sent from MI (586-839-XXXX) to GA (XXX-X6X-56XX)

All in violation of Title 18, United States Code, Section 1343.

**COUNTS SIX THROUGH NINE**

*Wire Fraud*  
18 U.S.C. § 1343

46. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

47. On or about April 26, 2018, L.C. received an Always Hope adoption opportunity for pregnant birth mother Jane Doe 2. The opportunity included Jane Doe 2's first name, and said that the sex of the baby was unknown because Jane Doe 2 was only six weeks pregnant. The opportunity stated that her estimated due date was December 17, 2018. L.C. told LEE that she and J.C. were interested in adopting Jane Doe 2's baby.

48. On or about April 27, 2018, LEE sent L.C. a text message telling her that Jane Doe 2 had chosen L.C. and J.C. to adopt her child. On or about April 27, 2018, May 1, 2018, and May 5, 2018, J.C. and L.C. paid LEE a total of \$33,000 by providing her with credit card numbers over the phone.

49. In April 2018, M.J. and N.J. saw the Always Hope adoption opportunity for Jane Doe 2 described above in paragraph 47. On or about April 27, 2018, M.J. spoke to LEE on the phone, and told her that she and N.J. were interested in adopting Jane Doe 2's baby.

50. On or about April 29, 2018, LEE sent M.J. a text message telling her that Jane Doe 2 had chosen M.J. and N.J. to adopt her child. On or about April 30, 2018, N.J. paid LEE \$25,000 by providing her with credit card numbers over the phone.

51. From April to November 2018, LEE communicated with L.C./J.C. and M.J./N.J. through text messages and phone conversations. LEE gave both sets of prospective adoptive parents occasional updates about Jane Doe 2 and her pregnancy.

52. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION</b>	<b>TRANSACTION DETAILS</b>
6	4/27/2018	Text from LEE to L.C. about Jane Doe 2	Sent from MI (586-839-XXXX) to MI (XXX-X2X-36XX)
7	4/29/2018	Text from LEE to M.J. about Jane Doe 2	Sent from MI (586-839-XXXX) to MO (XXX-X4X-63XX)
8	6/23/2018	Image sent via text message from LEE to L.C. depicting Jane Doe 2	Sent from MI (586-839-XXXX) to MI (XXX-X2X-36XX)
9	6/23/2018	Image sent via text message from LEE to M.J. depicting Jane Doe 2	Sent from MI (586-839-XXXX) to MO (XXX-X4X-63XX)

All in violation of Title 18, United States Code, Section 1343.

**COUNTS TEN AND ELEVEN**

*Wire Fraud*  
18 U.S.C. § 1343

53. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

54. On or about June 15, 2018, C.L. received an Always Hope adoption opportunity for Jane Doe 3. The opportunity stated that the baby's sex was unknown, and that Jane Doe 3's estimated due date was November 8, 2018. A photograph of Jane Doe 3 was attached to the opportunity. C.L. communicated to LEE that she and J.L. were interested in adopting Jane Doe 3's child.

55. In June 2018, S.G. and B.G. received an Always Hope adoption opportunity for Jane Doe 3. The opportunity was the same one described above in paragraph 54. S.G. communicated to LEE that she and B.G. were interested in adopting Jane Doe 3's child.

56. On or about June 16, 2018, LEE told S.G. that Jane Doe 3 had chosen S.G. and B.G. to adopt her child. On or about June 16, 2018, B.G. paid LEE \$12,000 by providing her with credit card numbers over the phone.

57. On or about June 17, 2018, LEE told J.L. that Jane Doe 3 had chosen J.L. and C.L. to adopt her child. On or about June 18, 2018, J.L. paid LEE \$18,000 by providing her with credit card numbers over the phone.

58. In truth and fact, Jane Doe 3 was not pregnant. She did not tell LEE that she was pregnant or otherwise communicate with LEE about adoption in 2018.

59. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION</b>	<b>TRANSACTION DETAILS</b>
10	6/16/2018	Text from LEE to S.G. about Jane Doe 3	Sent from MI (586-839-XXXX) to OH (XXX-X4X-47XX)
11	6/17/2018	Text from LEE to J.L. about Jane Doe 3	Sent from MI (586-839-XXXX) to SC (XXX-X1X-35XX)

All in violation of Title 18, United States Code, Section 1343.

**COUNTS TWELVE AND THIRTEEN**

*Wire Fraud*  
18 U.S.C. § 1343

60. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

61. On or about July 3, 2018, S.M. received an Always Hope adoption opportunity for Jane Doe 4. The opportunity stated that Jane Doe 4 was expecting a baby boy in

December 2018. S.M. communicated to LEE that she and P.M. were interested in adopting Jane Doe 4's child.

62. On or about July 4, 2018, LEE told S.M. that Jane Doe 4 had chosen S.M. and P.M. to adopt her baby. On or about July 4, 2018, S.M. and P.M. paid LEE \$17,000 by providing her with credit card numbers over the phone.

63. In the beginning of July 2018, LEE told E.L. about birth mother Jane Doe 4. On or about July 5, 2018, J.L.2 and E.L. communicated to LEE that they were interested in adopting Jane Doe 4's baby.

64. On or about July 7, 2018, LEE sent a text message to E.L. telling her that Jane Doe 4 had chosen her and J.L.2 to adopt her baby. On or about July 22, 2018, E.L. and J.L.2 paid LEE \$17,000 by providing her with credit card numbers over the phone.

65. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS
12	7/23/2018	Text from LEE to S.M. about Jane Doe 4	Sent from MI (586-839-XXXX) to OH (XXX-X4X-35XX)
13	7/25/2018	Text from LEE to E.L.. about Jane Doe 4	Sent from MI (586-839-XXXX) to IN (XXX-X1X-74XX)

All in violation of Title 18, United States Code, Section 1343.

### COUNT FOURTEEN

*Wire Fraud*  
18 U.S.C. § 1343

66. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

67. On or about September 21, 2018, M.B. and J.B. learned about an Always Hope adoption opportunity for Jane Doe 5. The information that they received said that Jane Doe 5 had an estimated due date of March 6, 2019, and that Jane Doe 5 had come to Always Hope “as a referral from another expectant mother.” M.B. and J.B. expressed their interest in adopting Jane Doe 5’s baby.

68. On or about September 29, 2018, LEE told J.B. that Jane Doe 5 had chosen J.B. and M.B. to adopt her baby. On or about September 29, 2018, J.B. and M.B. paid LEE \$15,000 by providing her with their credit card numbers over the phone.

69. In truth and fact, prior to accepting payment from M.B. and J.B., LEE had never met with Jane Doe 5, had not confirmed that she was pregnant, and had not

determined that Jane Doe 5 wanted to work with LEE to place her child into adoption.

70. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION</b>	<b>TRANSACTION DETAILS</b>
14	10/3/2018	Text from LEE to J.B. about Jane Doe 5	Sent from MI (586-839-XXXX) to KY (XXX-X2X-44XX)

All in violation of Title 18, United States Code, Section 1343.

**COUNTS FIFTEEN AND SIXTEEN**

*Wire Fraud*  
18 U.S.C. § 1343

71. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

72. On or about October 1, 2018, A.P. received an Always Hope adoption opportunity for Jane Doe 6. The opportunity said that Jane Doe 6 had an estimated due date of March 1, 2019. The opportunity also stated that Jane Doe 6 “came to us as a referral from another expectant mother.” A.P. also received a photograph of



Jane Doe 6. A.P. told LEE that she and C.P. wanted to be considered for Jane Doe 6's adoption.

73. On or about October 2, 2018, LEE told A.P. that Jane Doe 6 had chosen A.P. and C.P. to adopt her baby. On or about October 3, 2018, A.P. and C.P. paid LEE \$15,000 by providing her with their credit card numbers over the phone.

74. On or about October 4, 2018, A.P. found a Facebook profile for Jane Doe 6. From the profile, A.P. learned that Jane Doe 6 did not plan to place her child into adoption. A.P. contacted LEE and withdrew from the match with Jane Doe 6.

75. On or about October 31, 2018, H.C. received an Always Hope adoption opportunity for Jane Doe 6. H.C. told LEE that she and M.C. were interested in adopting Jane Doe 6's baby.

76. On or about October 31, 2018, LEE told H.C. that Jane Doe 6 had chosen H.C. and M.C. to adopt her baby. On or about October 31, 2018 and November 5, 2018, H.C. and M.C. paid LEE a total of \$15,000.

77. In truth and in fact, Jane Doe 6 was pregnant in 2018. Jane Doe 6 did not tell LEE that she wanted to place her child into adoption. Jane Doe 6 did not select A.P./C.P. or H.C./M.C. as adoptive parents for her child.

78. On or about the dates set forth below, in the Eastern District of Michigan, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and

sounds described below for each count, each count constituting a separate count of the indictment:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION</b>	<b>TRANSACTION DETAILS</b>
15	10/2/2018	Phone conversation between LEE, Jane Doe 2, and A.P.	From MI (586-839-XXXX) to SC (XXX-X9X-58XX)
16	11/1/2018	Ultrasound images sent via text message from LEE to H.C.	From MI (586-839-XXXX) to KY (XXX-X1X-29XX)

All in violation of Title 18, United States Code, Section 1343.

### **COUNTS SEVENTEEN AND EIGHTEEN**

#### *Wire Fraud* 18 U.S.C. § 1343

79. The allegations of paragraphs 1 through 29 are realleged and incorporated by reference.

80. In October 2018, H.B. and J.B.2 received an Always Hope adoption opportunity for Jane Doe 7. The opportunity said that Jane Doe 7 had an estimated due date of March 17, 2019, and that Jane Doe 7 “came to us as a referral from another expectant mother.” H.B. and J.B.2 told LEE that they wanted to be considered for Jane Doe 7’s adoption.

81. On or about October 21, 2018, LEE told H.B. that Jane Doe 7 had chosen H.B. and J.B.2 to adopt her baby. On or about October 21, 23, 24, and 25, 2018, H.B. and

J.B.2 paid LEE \$13,000 by providing her with their credit card numbers over the phone.

82. In truth and fact, prior to accepting payment from H.B. and J.B.2, LEE had never met with Jane Doe 7, had not confirmed that she was pregnant, and had not determined that she wanted to work with LEE to place her child into adoption.

83. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION</b>	<b>TRANSACTION DETAILS</b>
17	10/21/2018	Phone conversation between LEE, Jane Doe 2, and H.B.	From MI (586-839-XXXX) to AL (XXX-X7X-25XX)
18	11/2/2018	Phone conversation between LEE, Jane Doe 2, and H.B.	From MI (586-839-XXXX) to AL (XXX-X7X-25XX)

All in violation of Title 18, United States Code, Section 1343.

### **FORFEITURE ALLEGATION**

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – *Criminal Forfeiture*)

The allegations contained in Counts One through Eighteen of this Indictment are realleged and incorporated by reference to allege forfeiture under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, set forth in Counts One through Eighteen, the defendant shall forfeit to the United States of America, under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to the following real property:

**Lot 45, Weathervane Woods Subdivision, according to the plat thereof as recorded in Liber 161, Pages 17 through 21, both inclusive of Plats, Macomb County Records.**

**Commonly known as: 30370 Redford, New Haven, MI 48048**

**Parcel ID No.: 06-28-301-032**

The forfeiture in this case may also include entry of a forfeiture money judgment in an amount up to the value of the property subject to forfeiture for the violations of conviction.

If, by any act or omission of the defendant, the proceeds of the offense(s) cannot be located upon the exercise of due diligence, have been transferred, sold to, or deposited with a third party, have been placed beyond the jurisdiction of the court, have been substantially diminished in value, or have been commingled with other property which cannot be divided without difficulty, the United States of America shall seek to forfeit substitute property under Title 21, United States Code, Section

853(p), as incorporated by Title 28, United States Code, Section 2461(c).

**THIS IS A TRUE BILL.**

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER  
United States Attorney

s/John Neal  
JOHN NEAL  
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s/Sara D. Woodward  
SARA D. WOODWARD  
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March 7, 2019

Case:2:19-cr-20128  
 Judge: Friedman, Bernard A.  
 MJ: Whalen, R. Steven  
 Filed: 03-07-2019 At 11:55 AM  
 INDI USA V. LEE (NA)

United States District Court  
 Eastern District of Michigan

**Criminal Case Cover**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>SMW</i>

Case Title: USA v. Tara Lynn Lee

County where offense occurred : Macomb County

Check One:     Felony                       Misdemeanor                       Petty

Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: 19-MJ-30015 ]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**


Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

03/07/2019  
 Date

  
 Sara D. Woodward  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226-3277  
 Phone: 313-226-9180  
 Fax: 313-226-2873  
 E-Mail address: Sara.Woodward@usdoj.gov  
 Attorney Bar #: P73784

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.