UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

KENYAN SHONDRE SCOTT

Case No. 3:20-cr- 40-J-34JBT
Cts. 1-55: 26 U.S.C. § 7206(2)
Cts. 56-59: 26 U.S.C. § 7206(1)

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH FIFTY-FIVE

A. Introduction

At all times material to this Indictment, unless otherwise specified:

1. The defendant, KENYAN SHONDRE SCOTT, was a resident of Jacksonville, Duval County, Florida, and the owner and operator of Pro Resource Services, Inc., which also operated under the name Professional Resource Services, a business located in Jacksonville that offered tax return preparation services beginning in approximately 2009.

2. Pro Resource Services, Inc., was first registered with the Florida Department of State on or about August 2, 2010. Records of the Florida Department of State reflect that the defendant was the President of the company.

3. The Internal Revenue Service ("IRS") is an agency of the United States Department of the Treasury with responsibility for the ascertainment, computation, assessment, and collection of revenue, including individual income taxes.

4. A Form 1040, U.S. Individual Income Tax Return, is an IRS form that is used to report an individual's income, exemptions, deductions, credits, taxes, taxes paid, and other financial information and to determine the amount of taxes owed by the individual to the IRS or the refund due to the individual from the IRS. A Form 1040A is a shorter, more simplified version of a Form 1040 that certain individuals may use.

5. A Schedule A (Form 1040), Itemized Deductions, is an IRS form that is used to report itemized deductions from an individual's adjusted gross income, which can reduce the individual's tax liability.

6. A Schedule C (Form 1040), Profit or Loss from Business (Sole Proprietorship), is an IRS form that is used to report an individual's income or loss from a business operated or a profession practiced as a sole proprietor.

7. A Form 3800, General Business Credit, is an IRS form that is used to claim certain miscellaneous credits, such as credits related to certain investments, credits related to the use or production of certain fuels or the use of alternative fuels, and credits related to certain employer-provided employee

benefits, among many other types of credits. The General Business Credit is a non-refundable credit.

8. A Form 8863, Education Credits (American Opportunity and Lifetime Learning Credits), is an IRS form that is used to report qualified education expenses incurred by an individual to determine whether the individual is entitled to a tax credit and, if so, the amount of the credit. A Lifetime Learning Credit ("LLC") is a non-refundable education credit and an American Opportunity Credit ("AOC") is a refundable education credit.

9. A tax credit reduces an individual's income tax liability by the amount of the credit and may increase an individual's tax refund. If a tax credit is non-refundable, the amount of the credit may be used only to offset any tax owed. If a tax credit is refundable, the amount of the credit that is greater than the amount of tax owed is paid to the individual as a tax refund.

10. In preparing other individuals' income tax returns, the defendant knowingly reported false information to decrease the amount of the tax owed by the individuals to the IRS and to increase the amount of the tax refund received by the individuals from the IRS.

11. The defendant filed and caused to be filed with the IRS the tax returns of the other individuals that contained the false information.

12. The defendant's actions caused the IRS to issue refunds when tax would have been owed in the absence of the fraud and to issue larger refunds than otherwise would have been due in the absence of the fraud.

B. Charges

13. On or about the dates set forth as to each count below, in Duval County, in the Middle District of Florida, and elsewhere, the defendant,

KENYAN SHONDRE SCOTT,

did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of U.S. Individual Income Tax Returns, with accompanying schedules and forms, for the individuals identified by their initials and the tax years specified below, which were false and fraudulent as to material matters, in that the returns included the false and fraudulent statements specified below, which the defendant knew were false and fraudulent and which resulted in the individuals purportedly being entitled under the provisions of the Internal Revenue laws to claim certain deductions and credits, when, as the defendant knew, the individuals were not entitled to claim the deductions and credits, as follows:

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
ONE	March 20, 2014	2013	IRS Form 1040 and Form 8863 submitted on behalf of M.S., representing that M.S. had incurred at least $4,000 in education expenses and was entitled to an LLC of $1,500 and an AOC of $1,000
TWO	February 2, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of M.S., representing that M.S. had a business loss of $4,127 and was entitled to a general business credit of $2,850
THREE	March 5, 2016	2015	IRS Form 1040 and Form 3800 submitted on behalf of M.S., representing that M.S. was entitled to a general business credit of $3,500
FOUR	February 10, 2017	2016	IRS Form 1040 and Form 3800 submitted on behalf of M.S., representing that M.S. was entitled to a general business credit of $4,400
FIVE	February 4, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of M.S., representing that M.S. had made gifts to charity by cash or check of $1,813, had unreimbursed employee expenses of $9,850, and had other expenses of $5,054

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
SIX	February 9, 2014	2013	IRS Form 1040, Schedule C, Form 3800, and Form 8863 submitted on behalf of V.I. and D.S., representing that they had a business loss of $3,111, were entitled to a general business credit of $2,500, and had incurred at least $4,000 in education expenses and were entitled to an LLC of $1,500 and an AOC of $1,000
SEVEN	February 4, 2015	2014	IRS Form 1040, Schedule C, Form 3800, and Form 8863 submitted on behalf of V.I. and D.S., representing that they had a business loss of $2,976, were entitled to a general business credit of $1,000, and had incurred at least $8,000 in education expenses and were entitled to an LLC of $3,000 and an AOC of $2,000
EIGHT	February 5, 2016	2015	IRS Form 1040, Schedule A, and Form 3800 submitted on behalf of V.I. and D.S., representing that they had unreimbursed employee expenses of $4,789, had other expenses of $5,500, and were entitled to a general business credit of $1,688

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
NINE	February 13, 2017	2016	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of V.I. and D.S., representing that they had a business loss of $11,778 and were entitled to a general business credit of $3,700
TEN	January 29, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of V.I. and D.S., representing that they had unreimbursed employee expenses of $22,256 and had other expenses of $9,189
ELEVEN	February 21, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of T.H. and B.H., representing that they had a business loss of $7,355 and were entitled to a general business credit of $4,000
TWELVE	February 6, 2016	2015	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of T.H. and B.H., representing that they had a business loss of $7,991 and were entitled to a general business credit of $4,700
THIRTEEN	February 12, 2017	2016	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of T.H. and B.H., representing that they had a business loss of $6,132 and were entitled to a general business credit of $5,000

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
FOURTEEN	February 14, 2018	2017	IRS Form 1040, Schedule A, and Schedule C submitted on behalf of T.H. and B.H., representing that they had unreimbursed employee expenses of $10,306, had other expenses of $11,512, and had a business loss of $5,143
FIFTEEN	March 2, 2017	2016	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of F.F and H.F., representing that they had a business loss of $11,905 and were entitled to a general business credit of $4,300
SIXTEEN	February 12, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of F.F and H.F., representing that they had unreimbursed employee expenses of $7,118 and had other expenses of $12,534
SEVENTEEN	February 7, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of P.E. and R.E., representing that they had a business loss of $2,005 and were entitled to a general business credit of $1,925
EIGHTEEN	February 7, 2016	2015	IRS Form 1040 and Form 3800 submitted on behalf of P.E. and R.E., representing that they were entitled to a general business credit of $3,000

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
NINETEEN	February 14, 2017	2016	IRS Form 1040 and Form 3800 submitted on behalf of P.E. and R.E., representing that they were entitled to a general business credit of $3,550
TWENTY	February 25, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of P.E. and R.E., representing that they had paid personal property taxes of $3,000, had paid other taxes of $3,175, had made gifts to charity by cash or check of $3,446, had unreimbursed employee expenses of $9,804, and had other expenses of $9,967
TWENTY-ONE	March 5, 2014	2013	IRS Form 1040 and Form 8863 submitted on behalf of L.N., representing that L.N. had incurred at least $4,000 in education expenses and was entitled to an LLC of $718 and an AOC of $1,000
TWENTY-TWO	February 12, 2015	2014	IRS Form 1040A and Form 8863 submitted on behalf of L.N., representing that L.N. had incurred $2,855 in education expenses and was entitled to an LLC of $308 and an AOC of $886
TWENTY-THREE	February 15, 2016	2015	IRS Form 1040 and Form 3800 submitted on behalf of L.N. and S.N., representing that they were entitled to a general business credit of $2,700

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
TWENTY-FOUR	March 15, 2017	2016	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of L.N. and S.N., representing that they had a business loss of $4,585 and were entitled to a general business credit of $2,500
TWENTY-FIVE	February 4, 2018	2017	IRS Form 1040, Schedule A, and Schedule C submitted on behalf of L.N. and S.N., representing that they had paid other taxes of $2,510, had made gifts to charity by cash or check of $3,525, had unreimbursed employee expenses of $9,812, had other expenses of $9,225, and had a business loss of $8,540
TWENTY-SIX	March 10, 2014	2013	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of M.C., representing that M.C. had a business loss of $5,891 and was entitled to a general business credit of $4,133
TWENTY-SEVEN	February 6, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of M.C., representing that M.C. had a business loss of $12,190 and was entitled to a general business credit of $5,500

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
TWENTY-EIGHT	February 7, 2016	2015	IRS Form 1040, Schedule A, Schedule C, and Form 3800 submitted on behalf of M.C., representing that M.C. had paid mortgage interest of $11,044, had a business loss of $6,079, and was entitled to a general business credit of $3,000
TWENTY-NINE	February 1, 2017	2016	IRS Form 1040, Schedule A, and Form 3800 submitted on behalf of M.C., representing that M.C. had paid other taxes of $3,010, had unreimbursed employee expenses of $10,394, had other expenses of $8,000, and was entitled to a general business credit of $1,131
THIRTY	January 29, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of M.C., representing that M.C. had unreimbursed employee expenses of $9,815 and had other expenses of $6,266
THIRTY-ONE	February 5, 2014	2013	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of A.S., representing that A.S. had a business loss of $18,338 and was entitled to a general business credit of $3,000
THIRTY-TWO	February 2, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of A.S., representing that A.S. had a business loss of $16,350 and was entitled to a general business credit of $4,500

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
THIRTY-THREE	January 19, 2016	2015	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of A.S., representing that A.S. had a business loss of $14,625 and was entitled to a general business credit of $4,133
THIRTY-FOUR	February 1, 2017	2016	IRS Form 1040 and Form 3800 submitted on behalf of A.S., representing that A.S. was entitled to a general business credit of $6,351
THIRTY-FIVE	February 4, 2018	2017	IRS Form 1040, Schedule A, and Schedule C submitted on behalf of A.S., representing that A.S. had unreimbursed employee expenses of $9,758, had other expenses of $9,401, and had a business loss of $13,530
THIRTY-SIX	April 9, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of S.D., representing that S.D. had a business loss of $5,134 and was entitled to a general business credit of $4,000
THIRTY-SEVEN	February 19, 2016	2015	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of S.D., representing that S.D. had a business loss of $4,498 and was entitled to a general business credit of $4,500

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
THIRTY-EIGHT	March 5, 2017	2016	IRS Form 1040 and Form 3800 submitted on behalf of S.D., representing that S.D. was entitled to a general business credit of $3,500
THIRTY-NINE	April 16, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of S.D., representing that S.D. had paid other taxes of $3,547, had unreimbursed employee expenses of $3,550, and had other expenses of $7,371
FORTY	February 25, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of J.Q. and M.Q., representing that they had a business loss of $13,414 and were entitled to a general business credit of $4,363
FORTY-ONE	February 13, 2016	2015	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of J.Q. and M.Q., representing that they had a business loss of $14,242 and were entitled to a general business credit of $5,000
FORTY-TWO	April 12, 2017	2016	IRS Form 1040, Schedule A, and Schedule C submitted on behalf of J.Q. and M.Q., representing that they had unreimbursed employee expenses of $9,610, had other expenses of $10,545, and had a business loss of $27,106

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
FORTY-THREE	February 10, 2018	2017	IRS Form 1040, Schedule A, and Schedule C submitted on behalf of J.Q. and M.Q., representing that they had paid personal property taxes of $3,225, had paid other taxes of $6,329, had unreimbursed employee expenses of $18,184, had other expenses of $9,400, and had a business loss of $9,010
FORTY-FOUR	April 22, 2014	2013	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of J.D. and T.D., representing that they had a business loss of $16,733 and were entitled to a general business credit of $2,825
FORTY-FIVE	February 26, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of J.D. and T.D., representing that they had a business loss of $9,762 and were entitled to a general business credit of $3,000
FORTY-SIX	March 2, 2016	2015	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of J.D. and T.D., representing that they had a business loss of $16,200 and were entitled to a general business credit of $3,105

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
FORTY-SEVEN	March 30, 2017	2016	IRS Form 1040, Schedule A, and Schedule C submitted on behalf of J.D. and T.D., representing that they had paid other taxes of $2,594, had paid home mortgage interest not reported on Form 1098 of $3,415, had made gifts to charity by cash or check of $4,249, had unreimbursed employee expenses of $9,776, had other expenses of $2,871, and had a business loss of $15,814
FORTY-EIGHT	April 29, 2018	2017	IRS Form 1040, Schedule A, and Schedule C submitted on behalf of J.D. and T.D., representing that they had paid other taxes of $4,620, had paid home mortgage interest not reported on Form 1098 of $3,415, had made gifts to charity by cash or check of $1,500, had unreimbursed employee expenses of $8,125, had other expenses of $7,250, and had a business loss of $10,854
FORTY-NINE	March 14, 2015	2014	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of C.J., representing that C.J. had a business loss of $16,013 and was entitled to a general business credit of $3,000

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
FIFTY	February 11, 2016	2015	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of C.J., representing that C.J. had a business loss of $7,697 and was entitled to a general business credit of $3,700
FIFTY-ONE	February 12, 2017	2016	IRS Form 1040, Schedule C, and Form 3800 submitted on behalf of C.J., representing that C.J. had a business loss of $8,299 and was entitled to a general business credit of $5,500
FIFTY-TWO	March 11, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of C.J., representing that C.J. had paid personal property taxes of $2,349, had paid other taxes of $3,447, had unreimbursed employee expenses of $9,813, and had other expenses of $9,800
FIFTY-THREE	April 5, 2016	2015	IRS Form 1040 and Form 3800 submitted on behalf of R.D., representing that R.D. was entitled to a general business credit of $2,500
FIFTY-FOUR	February 27, 2017	2016	IRS Form 1040 and Form 3800 submitted on behalf of R.D., representing that R.D. was entitled to a general business credit of $4,000

Count	Date Tax Return Prepared	Tax Year	Description of Documents and False and Fraudulent Statements
FIFTY-FIVE	February 19, 2018	2017	IRS Form 1040 and Schedule A submitted on behalf of R.D., representing that R.D. had paid other taxes of $1,991, had made gifts to charity by cash or check of $3,071, had unreimbursed employee expenses of $9,803, and had other expenses of $10,971

All in violation of 26 U.S.C. § 7206(2).

COUNT FIFTY-SIX

On or about April 3, 2014, in Duval County, in the Middle District of Florida, the defendant,

KENYAN SHONDRE SCOTT,

who was a resident of Jacksonville, Florida, did willfully make and subscribe a 2013 Form 1040, U.S. Individual Income Tax Return, which contained a written declaration that it was made under penalties of perjury and which the defendant did not believe to be true and correct as to every material matter, in that the defendant stated in the Tax Return that his filing status was single, that he had earned wages, salaries, and tips of $12,325, that he had net business income of $29,554, that he was entitled to a general business credit of $4,300, and that he had federal income tax withheld of $4,532, when, as the defendant knew, his filing status was either married filing jointly or married filing separately, he had not earned any wages, salaries, or tips, he had net business income of approximately $113,960, he was not entitled to a general business credit, and he had not had any federal income tax withheld, and did file the Tax Return with the Internal Revenue Service.

In violation of 26 U.S.C. § 7206(1).

COUNT FIFTY-SEVEN

On or about August 25, 2015, in Duval County, in the Middle District of Florida, the defendant,

KENYAN SHONDRE SCOTT,

who was a resident of Jacksonville, Florida, did willfully make and subscribe a 2014 Form 1040, U.S. Individual Income Tax Return, which contained a written declaration that it was made under penalties of perjury and which the defendant did not believe to be true and correct as to every material matter, in that the defendant stated in the Tax Return that his filing status was single, that he had earned wages, salaries, and tips of $12,875, that he had net business income of $28,467, that he was entitled to a general business credit of $3,500, and that he had federal income tax withheld of $4,532, when, as the defendant knew, his filing status was either married filing jointly or married filing separately, he had not earned any wages, salaries, or tips, he had net business income of approximately $297,110, he was not entitled to a general business credit, and he had not had any federal income tax withheld, and did file the Tax Return with the Internal Revenue Service.

In violation of 26 U.S.C. § 7206(1).

COUNT FIFTY-EIGHT

On or about August 27, 2016, in Duval County, in the Middle District of Florida, the defendant,

KENYAN SHONDRE SCOTT,

who was a resident of Jacksonville, Florida, did willfully make and subscribe a 2015 Form 1040, U.S. Individual Income Tax Return, which contained a written declaration that it was made under penalties of perjury and which the defendant did not believe to be true and correct as to every material matter, in that the defendant stated in the Tax Return that his filing status was single, that he had earned wages, salaries, and tips of $12,885, that he had net business income of $26,963, that he was entitled to a general business credit of $3,000, and that he had federal income tax withheld of $4,542, when, as the defendant knew, his filing status was either married filing jointly or married filing separately, he had not earned any wages, salaries, or tips, he had net business income of approximately $170,760, he was not entitled to a general business credit, and he had not had any federal income tax withheld, and did file the Tax Return with the Internal Revenue Service.

In violation of 26 U.S.C. § 7206(1).

COUNT FIFTY-NINE

On or about October 27, 2017, in Duval County, in the Middle District of Florida, the defendant,

KENYAN SHONDRE SCOTT,

who was a resident of Jacksonville, Florida, did willfully make and subscribe a 2016 Form 1040, U.S. Individual Income Tax Return, which contained a written declaration that it was made under penalties of perjury and which the defendant did not believe to be true and correct as to every material matter, in that the defendant stated in the Tax Return that his filing status was single, that he had earned wages, salaries, and tips of $12,889, that he had net business income of $16,337, and that he had federal income tax withheld of $4,547, when, as the defendant knew, his filing status was either married filing jointly or married filing separately, he had not earned any wages, salaries, or tips, he had net business income of approximately $211,429, and he had not had any federal income tax withheld, and did file the Tax Return with the Internal Revenue Service.

In violation of 26 U.S.C. § 7206(1).

A TRUE BILL,

Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By:
ARNOLD B. CORSMEIER
Assistant United States Attorney

By:
for KELLY S. KARASE
Assistant United States Attorney
Deputy Chief, Jacksonville Division

FORM OBD-34
APR 1991

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

KENYAN SHONDRE SCOTT

INDICTMENT

Violations:

26 U.S.C. § 7206(1) & (2)

A true bill,

Foreperson

Filed in open court this 4th day

of March, 2020.

Clerk

Bail $__________