

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

UNITED STATES OF AMERICA

v.

JENNIFER MALDONADO
JORGE MALDONADO
SHARON GLOVER
and
DIANE WHITE

SEALED
INDICTMENT

4:15cr44-MW

THE GRAND JURY CHARGES:

COUNT ONE


A. INTRODUCTION

At all times material to this Indictment:

1. **JORGE MALDONADO** owned and operated Maldonado Tax Service, a tax preparation business located in Oviedo, Florida.
2. **JENNIFER MALDONADO**, the daughter of **JORGE MALDONADO**, was a tax preparer for Maldonado Tax Service.
3. **JENNIFER MALDONANDO** was an office manager and tax preparer for tax preparation businesses identified as "Tax Lady," "Tax Lady Two," and "Tax Lady 2," which used business addresses in Oviedo, Florida, and Longwood, Florida.

CERTIFIED A TRUE COPY
Jessica J. Lyublanovits

By: 
Deputy Clerk


Filed 110315 USDC Fl 4 PM 0419

4. The Internal Revenue Service (IRS) issued tax preparation businesses unique Electronic Filing Identification Numbers (EFINs) that were used by these businesses to electronically submit federal tax returns directly to the IRS.

5. Maldonado Tax Service was assigned an EFIN number ending in -332, which was used by **JORGE MALDONADO** and **JENNIFER MALDONADO** to electronically file federal tax returns directly with the IRS.

6. Tax Lady was assigned an EFIN number ending in -969, which was used by **JORGE MALDONADO** and **JENNIFER MALDONADO** to electronically file federal tax returns directly with the IRS.

7. The IRS issued refunds on returns electronically filed under EFIN -332: (a) in the form of U.S. Treasury checks that were mailed to addresses identified on the returns, and (b) in the form of electronic deposits made to an account at Ohio Valley Bank.

8. The IRS issued refunds on returns electronically filed under EFIN -969: (a) in the form of U.S. Treasury checks that were mailed to addresses identified on the returns, and (b) in the form of electronic deposits made to accounts at J.P. Morgan Chase Bank and University Bank.

9. **JORGE MALDONADO** and **JENNIFER MALDONADO** withdrew funds from the bank accounts described in paragraphs 7 and 8 above by means of cashier's checks drawn on those accounts.

10. **JORGE MALDONADO** maintained and had signature authority on an account at Bank of America ending in -0668.

11. **JENNIFER MALDONADO** maintained and had signature authority on an account at Bank of America ending in -1396.

B. THE CHARGE

Between on or about February 5, 2009, and on or about October 30, 2011, in the Northern District of Florida and elsewhere, the defendants,

**JENNIFER MALDONADO,
JORGE MALDONADO,
SHARON GLOVER,
and
DIANE WHITE,**

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons to devise, and intend to devise, a scheme to defraud and for obtaining money and property by means of material false and fraudulent pretenses, representations, and promises, and to cause wire communications to be transmitted in interstate commerce for the purpose of executing such scheme, in violation of Title 18, United States Code, Section 1343.

C. MANNER AND MEANS

The manner and means by which this conspiracy was committed included the following:

1. The conspirators caused false and fraudulent federal income tax returns (“fraudulent returns”) to be prepared for the purpose of generating and obtaining the payment of tax refunds.
2. These fraudulent returns falsely reported the taxpayer’s income, withholding, credits, and the refund due.

3. **JORGE MALDONADO** and **JENNIFER MALDONADO** caused the fraudulent returns to be filed using tax preparation software, including Intuit, and to be filed directly with the IRS using EFINs ending in -332 and -969.

4. **JORGE MALDONADO** and **JENNIFER MALDONADO** obtained refunds issued by the IRS in connection with these fraudulent returns by causing the IRS to mail United States Treasury checks to addresses designated by the conspirators on the fraudulent returns.

5. **JORGE MALDONADO** and **JENNIFER MALDONADO** fraudulently obtained refunds issued by the IRS in connection with these fraudulent returns by causing the IRS to deposit the refunds into accounts at Ohio Valley Bank, J.P. Morgan Chase Bank, and University Bank, and by withdrawing funds from these bank accounts by means of cashier's checks.

6. **SHARON GLOVER** and **DIANE WHITE** obtained forged and fraudulent powers of attorney that falsely stated that the taxpayers identified on the fraudulent returns had authorized **SHARON GLOVER** and **DIANE WHITE** to cash checks on the taxpayers' behalf.

7. **SHARON GLOVER** and **DIANE WHITE** obtained letters falsely stating that they were assisting taxpayers and tax preparation firms in the preparation of tax returns and in the cashing of refund checks issued in connection with those returns.

8. Using these letters and powers of attorney as proof that the taxpayers named in the fraudulent returns had authorized their conduct, **SHARON GLOVER** and

DIANE WHITE cashed refund checks issued in connection with the fraudulent returns at a convenience store in Tallahassee, Florida.

9. **SHARON GLOVER** and **DIANE WHITE** deposited a portion of the cash proceeds they obtained by cashing refund checks issued in connection with the fraudulent returns into Bank of America accounts ending in -0668 and -1396.

10. **SHARON GLOVER** and **DIANE WHITE** retained as payment for their role in the conspiracy a portion of the fraudulently obtained refunds.

11. By this conduct, the conspirators obtained and attempted to obtain approximately \$815,990 in tax refunds to which they were not entitled.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH TWELVE

A. INTRODUCTION

The allegations of Count One are hereby realleged and incorporated by reference as if fully set forth herein.

B. THE CHARGE

On or about the dates listed below, in the Northern District of Florida and elsewhere, the defendants,

**JENNIFER MALDONADO,
JORGE MALDONADO,
SHARON GLOVER,
and
DIANE WHITE,**

did knowingly and willfully devise, and intend to devise, a scheme to defraud and for obtaining money and property by means of material false and fraudulent pretenses,

representations, and promises, and for the purpose of executing such scheme, did cause wire communications to be transmitted in interstate commerce.

C. SCHEME TO DEFRAUD

It was part of the scheme to defraud that:

1. The defendants caused false and fraudulent federal income tax returns (“fraudulent returns”) to be prepared for the purpose of generating and obtaining the payment of tax refunds.
2. These fraudulent returns falsely reported the taxpayer’s income, withholding, credits, and the refund due.
3. **JORGE MALDONADO** and **JENNIFER MALDONADO** caused the fraudulent returns to be filed using tax preparation software, including Intuit, and to be filed directly with the IRS using EFINs ending in -332 and -969.
4. **JORGE MALDONADO** and **JENNIFER MALDONADO** obtained refunds issued by the IRS in connection with these fraudulent returns by causing the IRS to mail United States Treasury checks to addresses designated by the defendants on the fraudulent returns.
5. **JORGE MALDONADO** and **JENNIFER MALDONADO** fraudulently obtained refunds issued by the IRS in connection with these fraudulent returns by causing the IRS to deposit the refunds into accounts at Ohio Valley Bank, J.P. Morgan Chase Bank, and University Bank, and by withdrawing funds from these bank accounts by means of cashier’s checks.

6. **SHARON GLOVER** and **DIANE WHITE** obtained forged and fraudulent powers of attorney that falsely stated that the taxpayers identified on the fraudulent returns had authorized **SHARON GLOVER** and **DIANE WHITE** to cash checks on the taxpayers' behalf.

7. **SHARON GLOVER** and **DIANE WHITE** obtained letters falsely stating that they were assisting taxpayers and tax preparation firms in the preparation of tax returns and in the cashing of refund checks issued in connection with those returns.

8. Using these letters and powers of attorney as proof that the taxpayers named in the fraudulent returns had authorized their conduct, **SHARON GLOVER** and **DIANE WHITE** cashed refund checks issued in connection with the fraudulent returns at a convenience store in Tallahassee, Florida.

9. **SHARON GLOVER** and **DIANE WHITE** deposited a portion of the cash proceeds they obtained by cashing refund checks issued in connection with the fraudulent returns into Bank of America accounts ending in -0668 and -1396.

10. **SHARON GLOVER** and **DIANE WHITE** retained as payment for their role in the conspiracy a portion of the fraudulently obtained refunds.

11. By this conduct, the defendants obtained and attempted to obtain approximately \$815,990 in tax refunds to which they were not entitled.

D. WIRE COMMUNICATIONS

On or about the following dates, for the purpose of executing the scheme to defraud, the defendants,

**JENNIFER MALDONADO,
JORGE MALDONADO,
SHARON GLOVER,
and
DIANE WHITE,**

knowingly did cause wire communications to be transmitted in interstate commerce as set forth below:

COUNTS	DATE	COMMUNICATION
TWO	March 10, 2011	Cashing of a University Bank cashier's check in the name of H.W. \$1,420.05
THREE	March 10, 2011	Cashing of a University Bank cashier's check in the name of E.W. \$1,109.05
FOUR	March 15, 2011	Cashing of a United States Treasury check in the name of B.D.G. \$2,110.00
FIVE	March 15, 2011	Cash deposit of \$12,640.00 into Bank of America account ending in -1396
SIX	May 6, 2011	Cashing of a University Bank cashier's check in the name of A.M. \$1,347.05
SEVEN	May 6, 2011	Cashing of a University Bank cashier's check in the name of J.M.G. \$2,284.05
EIGHT	July 22, 2011	Cashing of a United States Treasury check in the name of M.C. \$9,500.00
NINE	August 5, 2011	Cashing of a University Bank cashier's check in the name of N.R.O. \$2,877.05
TEN	September 23, 2011	Cashing of a United States Treasury check in the name of T.C. \$9,830.00
ELEVEN	September 26, 2011	Cashing of a University Bank cashier's check in the name of D.J. \$9,442.69
TWELVE	September 30, 2011	Cashing of a United States Treasury check in the name of J.F. \$9,166.00

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

COUNT THIRTEEN

On or about March 10, 2011, in the Northern District of Florida and elsewhere,
the defendant,

DIANE WHITE,

did knowingly and willfully steal and convert to her own use and the use of another,
money of the United States, that is, a United States tax refund in the approximate amount
of \$1,420.05.

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

COUNT FOURTEEN

On or about March 10, 2011, in the Northern District of Florida and elsewhere,
the defendant,

DIANE WHITE,

did knowingly and willfully steal and convert to her own use and the use of another,
money of the United States, that is, a United States tax refund in the approximate amount
of \$1,109.05.

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

COUNT FIFTEEN

On or about March 23, 2011, in the Northern District of Florida and elsewhere,
the defendant,

SHARON GLOVER,

did knowingly and willfully steal and convert to her own use and the use of another, money of the United States, that is, a United States tax refund in the approximate amount of \$1,542.05.

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

COUNT SIXTEEN

On or about May 6, 2011, in the Northern District of Florida and elsewhere, the defendants,

**JENNIFER MALDONADO,
JORGE MALDONADO,
and
SHARON GLOVER,**

did knowingly and willfully steal and convert to their own use and the use of another, money of the United States, that is, a United States tax refund in the approximate amount of \$1,347.05.

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

COUNT SEVENTEEN

On or about May 6, 2011, in the Northern District of Florida and elsewhere, the defendants,

**JENNIFER MALDONADO,
JORGE MALDONADO,
and
SHARON GLOVER,**

did knowingly and willfully steal and convert to their own use and the use of another, money of the United States, that is, a United States tax refund in the approximate amount of \$2,284.05.

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

COUNT EIGHTEEN

On or about March 10, 2011, in the Northern District of Florida, the defendant,

DIANE WHITE,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name of H.W. and the name of E.W., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, Theft of Government Property, as charged in Count Thirteen and Count Fourteen of this Indictment.

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

COUNT NINETEEN

On or about March 23, 2011, in the Northern District of Florida, in the Northern District of Florida, the defendant,

SHARON GLOVER,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name of T.A., and the name and notary seal of B.R., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, Theft of Government Property, as charged in Count Fifteen of this Indictment.

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

COUNT TWENTY

On or about August 5, 2011, in the Northern District of Florida, the defendants

**JENNIFER MALDONADO,
JORGE MALDONADO,
and
SHARON GLOVER,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name of N.R.O., and the name and notary seal of R.C., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, Wire Fraud, as charged in Count Nine of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT TWENTY-ONE

Between on or about March 1, 2011, and on or about November 30, 2011, in the Northern District of Florida and elsewhere, the defendants,

**JENNIFER MALDONADO,
JORGE MALDONADO,
SHARON GLOVER,
and
DIANE WHITE,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name and notary seal of F.J.B., J.J., C.S., and S.V. during and in relation to felony violations enumerated in Title 18, United States

Code, Section 1028A(c), namely, Conspiracy to Commit Wire Fraud, as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

CRIMINAL FORFEITURE

The allegations contained in Counts One through Seventeen of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. From their engagement in the violations alleged in Counts One through Seventeen of this Indictment, the defendants,

**JENNIFER MALDONADO,
JORGE MALDONADO,
SHARON GLOVER,
and
DIANE WHITE,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the defendants' right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offenses.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendants:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or

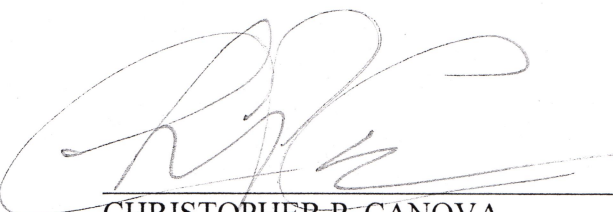
v. has been commingled with other property that cannot be subdivided without difficulty,

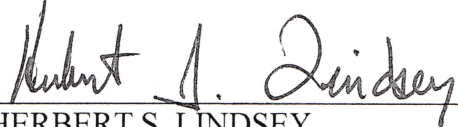
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A TRUE BILL:

Redacted

11-3-15
DATE


CHRISTOPHER P. CANOVA
Acting United States Attorney


HERBERT S. LINDSEY
Assistant United States Attorney