

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

**UNITED STATES OF AMERICA**

**v.**

**INDICTMENT**

**ROOSEVELT WILLIAMS**  
\_\_\_\_\_ /

4:16cr 31-MW-CAS

**THE GRAND JURY CHARGES:**

**COUNT ONE**

Between on or about October 12, 2011, and on or about December 16, 2011,  
in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of  
another, and without authority did convey and dispose of money of the United  
States of a value of more than \$1,000, to wit, money of the Internal Revenue  
Service, namely, a fraudulently obtained federal income tax refund in the name of  
F.H., in the approximate amount of \$3,500.

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

**COUNT TWO**

Between on or about October 15, 2011, and on or about December 19, 2011,  
in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of  
another, and without authority did convey and dispose of money of the United  
States of a value of more than \$1,000, to wit, money of the Internal Revenue  
Service, namely, a fraudulently obtained federal income tax refund in the name of  
R.A., in the approximate amount of \$7,065.

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

**COUNT THREE**

Between on or about October 10, 2011, and on or about November 21, 2011,  
in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of  
another, and without authority did convey and dispose of money of the United  
States of a value of more than \$1,000, to wit, money of the Internal Revenue  
Service, namely, a fraudulently obtained federal income tax refund in the name of  
M.R., in the approximate amount of \$5,208.

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

**COUNT FOUR**

Between on or about October 10, 2011, and on or about December 16, 2011,  
in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of  
another, and without authority did convey and dispose of money of the United  
States of a value of more than \$1,000, to wit, money of the Internal Revenue  
Service, namely, a fraudulently obtained federal income tax refund in the name of  
L.P., in the approximate amount of \$3,500.

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

**COUNT FIVE**

Between on or about October 10, 2011, and on or about November 18, 2011,  
in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of  
another, and without authority did convey and dispose of money of the United  
States of a value of more than \$1,000, to wit, money of the Internal Revenue  
Service, namely, a fraudulently obtained federal income tax refund in the name of  
A.C., in the approximate amount of \$3,500.

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

**COUNT SIX**

Between on or about October 15, 2011, and on or about December 29, 2011,  
in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of  
another, and without authority did convey and dispose of money of the United  
States of a value of more than \$1,000, to wit, money of the Internal Revenue  
Service, namely, a fraudulently obtained federal income tax refund in the name of  
R.B., in the approximate amount of \$3,500.

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

**COUNT SEVEN**

Between on or about October 10, 2011, and on or about December 29, 2011,  
in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

did knowingly possess and use, without lawful authority, a means of identification  
of another person, to wit, the name of F.H., R.A., M.R., L.P., A.C., and R.B.,  
during and in relation to a felony violation enumerated in Title 18, United States  
Code, Section 1028A(c), that is, theft of government money, as charged in Counts  
One through Six of this Indictment.

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

**COUNT EIGHT**

Between on or about June 5, 2013, and on or about June 13, 2013, in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of another, and without authority did convey and dispose of money of the United States of a value of more than \$1,000, to wit, money of the Internal Revenue Service, namely, a fraudulently obtained federal income tax refund in the names of B.W.J. and C.J., in the approximate amount of \$8,047.

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

**COUNT NINE**

Between on or about June 5, 2013, and on or about June 13, 2013, in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of another, and without authority did convey and dispose of money of the United States of a value of more than \$1,000, to wit, money of the Internal Revenue Service, namely, a fraudulently obtained federal income tax refund in the names of J.H. and J.H., in the approximate amount of \$8,573.

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

**COUNT TEN**

Between on or about June 5, 2013, and on or about June 13, 2013, in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of another, and without authority did convey and dispose of money of the United States of a value of more than \$1,000, to wit, money of the Internal Revenue Service, namely, a fraudulently obtained federal income tax refund in the names of D.G. and H.G., in the approximate amount of \$1,544.78.

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

**COUNT ELEVEN**

Between on or about June 5, 2013, and on or about June 13, 2013, in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of another, and without authority did convey and dispose of money of the United States of a value of more than \$1,000, to wit, money of the Internal Revenue Service, namely, a fraudulently obtained federal income tax refund in the names of D.K. and L.K., in the approximate amount of \$8,047.

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

**COUNT TWELVE**

Between on or about June 5, 2013, and on or about June 13, 2013, in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of another, and without authority did convey and dispose of money of the United States of a value of more than \$1,000, to wit, money of the Internal Revenue Service, namely, a fraudulently obtained federal income tax refund in the names of B.L. and J.L., in the approximate amount of \$8,573.

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

**COUNT THIRTEEN**

Between on or about June 5, 2013, and on or about June 13, 2013, in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

knowingly and willfully did steal and convert to his own use and the use of another, and without authority did convey and dispose of money of the United States of a value of more than \$1,000, to wit, money of the Internal Revenue Service, namely, a fraudulently obtained federal income tax refund in the names of G.R. and L.R., in the approximate amount of \$8,047.

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

**COUNT FOURTEEN**

Between on or about June 5, 2013, and on or about June 13, 2013, in the Northern District of Florida and elsewhere, the defendant,

**ROOSEVELT WILLIAMS,**

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name of B.W.J. and C.J., J.H. and J.H., D.G. and H.G., D.K. and L.K., B.L. and J.L., and G.R. and L.R., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), that is, theft of government money, as charged in Counts Eight through Thirteen 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 Six and Eight through Thirteen of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

From his engagement in the violations alleged in Counts One through Six and Eight through Thirteen of this Indictment, the defendant,

**ROOSEVELT WILLIAMS,**

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

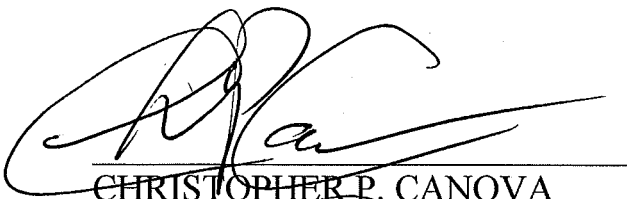


defendant's right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offenses.

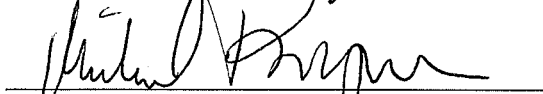
If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendant:

- 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 defendant up to the value of the forfeitable property.



CHRISTOPHER P. CANOVA  
United States Attorney



MICHAEL T. SIMPSON  
Assistant United States Attorney

Redacted  
FC

07-05-16  
DATE