

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

**UNITED STATES OF AMERICA**

**v.**

**TEONA N. RODGERS**  
\_\_\_\_\_ /

**SUPERSEDING  
INDICTMENT  
4:17CR1-RH**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

Between on or about January 17, 2012, and on or about May 31, 2012, in the Northern District of Florida and elsewhere, the defendant,

**TEONA N. RODGERS,**

knowingly and willfully did receive, conceal, and retain with the intent to convert to her own use and gain, money of the United States, to wit, money of the Internal Revenue Service, an agency of the United States, in an amount greater than \$1,000, knowing such money to have been embezzled, stolen, and converted.

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

**COUNT TWO**

Between on or about January 17, 2012, and on or about November 23, 2013, in the Northern District of Florida, the defendant,

**TEONA N. RODGERS,**

knowingly and with the intent to defraud, did possess fifteen or more unauthorized access devices, namely, the social security numbers of approximately 150 persons, and by this offense did affect interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(3) and 1029(c)(1)(A)(i).

**COUNT THREE**

Between on or about February 3, 2012, and on or about February 28, 2012, in the Northern District of Florida, the defendant,

**TEONA N. RODGERS,**

knowingly and with the intent to defraud, did effect transactions with one or more access devices issued to another person, to wit, account numbers issued in the names of K.N.C. and A.M.D., to receive payments and things of value during a one-year period, the aggregate value of which was equal to or greater than \$1,000, and by this offense did affect interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5), 1029(c)(1)(A)(ii), and 2.

**COUNT FOUR**

Between on or about January 18, 2012, and on or about February 24, 2012, in the Northern District of Florida and elsewhere, the defendant,

**TEONA N. RODGERS,**

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and social security number of K.N.C., A.H.J., A.M.D., and A.N.D., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, theft of government money as charged in Count One of this Indictment and use of an access device issued to another person as charged in Count Three this Indictment.

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

**COUNT FIVE**

On or about January 29, 2013, in the Northern District of Florida and elsewhere, the defendant,

**TEONA N. RODGERS,**

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and social security number of K.N.C. and A.H.J., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, possession of fifteen or more unauthorized access devices as charged in Count Two of this Indictment.

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

**COUNT SIX**

Between on or about January 29, 2013, and on or about February 17, 2013,  
in the Northern District of Florida and elsewhere, the defendant,

**TEONA N. RODGERS,**

knowingly made and presented to the Internal Revenue Service, a department and  
agency of the United States, a materially false claim against the United States,  
knowing such claim to be false, fictitious, and fraudulent, by filing and causing to  
be filed approximately 23 fraudulent federal income tax returns seeking  
approximately \$112,321 in federal tax refunds.

In violation of Title 18, United States Code, Sections 287 and 2.

**CRIMINAL FORFEITURE**

The allegations contained in Counts One, Two, and Three of this Indictment  
are hereby realleged and incorporated by reference for the purpose of alleging  
forfeiture.

From her engagement in the violations alleged in Counts One, Two, and  
Three of this Indictment, the defendant,

**TEONA N. RODGERS,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections  
981(a)(1)(C), 982(a)(2)(B), and 1029(c)(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; and any personal property used and intended to be used to commit the offenses alleged in Counts Two and Three.

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 18, United States Code, Sections 982(b)(1) and 1029(c)(2), and 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.

A TRUE BILL:

REDACTED

~~FOREPERSON~~

DATE 3-7-17

  
CHRISTOPHER P. CANOVA  
United States Attorney

*for*   
GARY MILLIGAN  
Assistant United States Attorney