

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA     )     No.  
  )  
  )     Violations: Title 18, United States  
  )     Code, Sections 287 and 1028(a)(7)  
CRYSTAL S. JACKSON             )

COUNT ONE

The JULY 2014 GRAND JURY charges:

1. At all times material to this indictment:

(a) The Internal Revenue Service (“IRS”) provided that taxpayers who were single or joint filers without any dependents and were entitled to a refund of federal individual income taxes could claim that refund by filing a Form 1040EZ United States Individual Income Tax Return (“Form 1040EZ”) either by signing and filing Form 1040EZ in person or by mail, or by participating in the Electronic Filing program and filing Form 1040EZ electronically.

(b) The Form 1040EZ required the taxpayer to provide included the taxpayer’s name and address, social security number, total income for the tax year, the amount of federal income tax withheld during the tax year, earned income credits, the amount of federal income tax, and the amount of tax due or refund claimed.

(c) The IRS relied upon information from the Form 1040EZ in determining and issuing taxpayer refunds. After receiving this information, the IRS would issue a refund to the taxpayer if there were no outstanding tax liabilities

or other federally authorized deductions on record with the IRS.

2. Between in or about August 1, 2011 and on or about February 5, 2013, defendant CRYSTAL S. JACKSON knowingly and willfully prepared and caused to be filed electronically and by mail with the IRS 45 Form 1040EZ individual income tax returns in the names of other individuals without their permission thereby causing false and fraudulent claims for refunds to be made against the United States Treasury in the amount of approximately \$189,237.

3. On or about February 4, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer D.D., claiming a \$1,915 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWO**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 4, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer T.W., claiming a \$1,915 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THREE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer Q.F., claiming a \$1,915 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT FOUR

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 4, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer M.S., claiming a \$1,915 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FIVE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.S., claiming a \$1,456 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT SIX

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer S.J., claiming a \$1,456 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT SEVEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.G., claiming a \$1,915 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT EIGHT

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer A.M., claiming a \$1,456 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT NINE

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.J., claiming a \$1,456 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT TEN

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer T.B., claiming a \$1,456 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT ELEVEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 5, 2013, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer H.P., claiming a \$1,915 federal income tax refund for tax year 2012, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT TWELVE

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about October 17, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer K.B., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTEEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about October 17, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.H., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT FOURTEEN

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about October 17, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.K., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FIFTEEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about October 17, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer C.K., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT SIXTEEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer T.S., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT SEVENTEEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer S.B., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT EIGHTEEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer L.C., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT NINETEEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.H., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer W.R., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-ONE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer B.F., claiming a \$5,782 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-TWO**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer S.K., claiming a \$5,782 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-THREE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer A.F., claiming a \$5,782 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-FOUR**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about September 8, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer D.A., claiming a \$4,974 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-FIVE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 14, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer B.M., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-SIX**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 14, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer T.S., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-SEVEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about October 12, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.B., claiming a \$5,439 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

## COUNT TWENTY-EIGHT

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about February 7, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer T.C., claiming a \$5,021 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT TWENTY-NINE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 11, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer Q.F., claiming a \$4,466 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

### **COUNT THIRTY**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about February 7, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer C.L., claiming a \$5,021 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-ONE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 11, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer C.G., claiming a \$4,459 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-TWO**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 11, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer M.B., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-THREE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 8, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer D.B., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-FOUR**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about September 10, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer D.C., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-FIVE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 11, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer E.C., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-SIX**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about August 1, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer G.H., claiming a \$2,988 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-SEVEN**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about September 11, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.M., claiming a \$3,400 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-EIGHT**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about September 8, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer R.P., claiming a \$4,594 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT THIRTY-NINE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about August 29, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer C.W., claiming a \$5,572 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FORTY**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 12, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer W.W., claiming a \$5,422 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FORTY-ONE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 9, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer J.H., claiming a \$5,407 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FORTY-TWO**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 17, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer B.M., claiming a \$4,404 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FORTY-THREE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 23, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer T.B., claiming a \$4,618 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FORTY-FOUR**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about September 23, 2011, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer S.D., claiming a \$4,538 federal income tax refund for tax year 2010, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FORTY-FIVE**

The JULY 2014 GRAND JURY further charges:

1. The government realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about January 18, 2012, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

CRYSTAL S. JACKSON,

defendant herein, made, presented and caused to be presented to the IRS, an agency of the United States, a claim upon and against the United States Department of Treasury, IRS, that is, a Form 1040EZ United States Individual Income Tax Return in the name of Taxpayer A.M., claiming a \$5,036 federal income tax refund for tax year 2011, knowing that the claim was false, fictitious and fraudulent;

In violation of Title 18, United States Code, Section 287.

**COUNT FORTY-SIX**

The JULY 2014 GRAND JURY further charges:

On or about February 13, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CRYSTAL S. JACKSON,

defendant herein, did knowingly possess and use in or affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, the name and social security number of T.W., knowing that the means of identification belonged to another actual person, in connection with unlawful activity that constitutes a violation of federal law, namely, the making of a false, fictitious and fraudulent claim to the United States as charged in Count 2 of this indictment, and as a result of the offense, the defendant obtained anything of value aggregating \$1,000 or more during any 1 year period;

In violation of Title 18, United States Code, Section 1028(a)(7) and (b)(1)(D).

**COUNT FORTY-SEVEN**

The JULY 2014 GRAND JURY further charges:

On or about February 13, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CRYSTAL S. JACKSON,

defendant herein, did knowingly possess and use in or affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, the name and social security number of M.S., knowing that the means of identification belonged to another actual person, in connection with unlawful activity that constitutes a violation of federal law, namely, the making of a false, fictitious and fraudulent claim to the United States as charged in Count 4 of this indictment, and as a result of the offense, the defendant obtained anything of value aggregating \$1,000 or more during any 1 year period;

In violation of Title 18, United States Code, Section 1028(a)(7) and (b)(1)(D).

**COUNT FORTY-EIGHT**

The JULY 2014 GRAND JURY further charges:

On February 7, 2012, at Rockford, in the Northern District of Illinois,  
Western Division,

**CRYSTAL S. JACKSON,**

defendant herein, did knowingly possess and use in or affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, 9 access devices, knowing that the means of identification belonged to other actual persons, in connection with unlawful activity that constitutes a violation of federal law, namely, the making of false, fictitious and fraudulent claims to the United States in violation of Title 18, United States Code, Section 287;

In violation of Title 18, United States Code, Section 1028(a)(7) and (b)(2)(B).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY