

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Crim. No. 16-
v.	:	
	:	18 U.S.C. § 371
REGINALD EAFORD	:	
	:	

**INFORMATION**

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
  - a. Defendant Reginald Eaford (“Eaford”) was a resident of Essex County, New Jersey. Eaford was an inmate in the Essex County Correctional Facility (“Essex County Jail”) from on or about May 20, 2013 through February 12, 2014.
  - b. Winfred Moses (“Moses”), a co-conspirator not named as a defendant herein, was a resident of East Orange, Essex County, New Jersey.
  - c. The Internal Revenue Service was a part of the Department of the Treasury and an agency of the United States of America.

### **The Conspiracy**

2. From at least in or around 2013, through on or about August 5, 2014, in Essex County, in the District of New Jersey and elsewhere, defendant

REGINALD EAFORD

knowingly and intentionally conspired and agreed with Winfred Moses and others, to make and present false, fictitious, and fraudulent claims to the Internal Revenue Service of the Department of the Treasury, an agency of the United States, contrary to Title 18, United States Code, Section 287.

### **Object of the Conspiracy**

3. The object of the conspiracy was to fraudulently obtain money and other things of value from the Internal Revenue Service of the Department of the Treasury.

### **Manner and Means**

4. It was part of the conspiracy that defendant Eaford, Moses, and others conspired with each other and others to submit false federal income tax returns to the Internal Revenue Service in order to fraudulently obtain federal income tax refunds.

5. It was further part of the conspiracy that defendant Eaford obtained social security numbers, dates of birth, and other information from inmates at the Essex County Jail.

6. It was further part of the conspiracy that defendant Eaford and Moses would generate false Internal Revenue Service Form W-2s indicating

that inmates at the Essex County Jail had earned income during the relevant tax year and that federal income tax had been withheld from their paychecks.

7. It was further part of the conspiracy that defendant Eaford, Moses, and others would then file false federal income tax returns on behalf of the inmates and others.

8. It was further part of the conspiracy that defendant Eaford and Moses caused federal income tax refund checks to be sent to the Essex County Jail or to Moses's residence in East Orange, New Jersey.

9. It was further part of the conspiracy that the proceeds from the fraudulent scheme were split among defendant Eaford, Moses, and others.

10. It was further part of the conspiracy that defendant Eaford and Moses caused approximately 112 fraudulent federal income tax returns to be filed for the tax years 2011, 2012, and 2013. In total, the fraudulent federal income tax returns claimed approximately \$670,206 in federal income tax refunds.

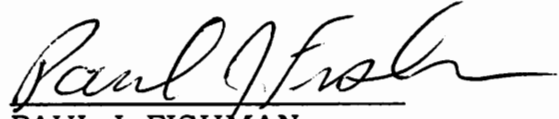
#### **Overt Acts**

11. In furtherance of the conspiracy and to effect its unlawful object, defendant Eaford and his co-conspirators committed, and caused to be committed, the following overt acts in the District of New Jersey and elsewhere:

a. On or about March 3, 2013, defendant Eaford caused a fraudulent income tax return to be electronically filed with the Internal Revenue Service.

b. On or about November 2, 2013, defendant Eaford placed a telephone call from the Essex County Jail to Moses to discuss the refund status for a fraudulent tax return.

All in violation of Title 18, United States Code, Section 371.

  
PAUL J. FISHMAN  
United States Attorney

**CASE NUMBER: 16-**

---

---

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

---

---

**UNITED STATES OF AMERICA**

**v.**

**REGINALD EAFORD**

---

---

**INFORMATION FOR  
18 U.S.C. § 371**

---

---

**PAUL J. FISHMAN  
*UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY***

---

---

**Francisco J. Navarro  
*ASSISTANT UNITED STATES ATTORNEY  
973-645-2515***

---

---