

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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

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 Winfred Moses (“Moses”) was a resident of East Orange, Essex County, New Jersey.
 - b. Reginald Eaford (“Eaford”), a co-conspirator not named as a defendant herein, 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.
 - 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

WINFRED MOSES

knowingly and intentionally conspired and agreed with Reginald Eaford 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 Moses, Eaford, 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 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 Moses and Eaford 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 Moses, Eaford, 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 Moses and Eaford caused federal income tax refund checks to be sent to the Essex County Jail or to defendant 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 Moses, Eaford, and others.

10. It was further part of the conspiracy that defendant Moses and Eaford 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.

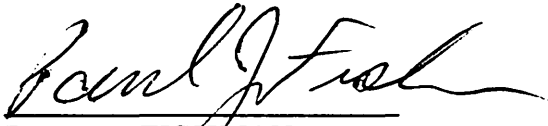
Overt Acts

11. In furtherance of the conspiracy and to effect its unlawful object, defendant Moses 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, Eaford caused a fraudulent income tax to be electronically filed with the Internal Revenue Service.

b. On or about November 2, 2013, Eaford placed a telephone call from the Essex County Jail to defendant 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-_____

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v.

WINFRED MOSES

INFORMATION FOR
18 U.S.C. § 371

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