

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION
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SOUTHERN DISTRICT
OF INDIANA
AMRA A. BRIGGS

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 TONY MICHAEL,)
 AMBER MORGAN, and)
 BARBARA DUNCAN,)
)
 Defendants.)

Cause No.: 1:15-cr-00195-SEB-DKL

-01
-02
-03

SUPERSEDING INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

1. In or about March 2015, at a hotel in Columbus, Indiana, defendants TONY MICHAEL, AMBER MORGAN, and BARBARA DUNCAN were in possession of mail stolen from victims in Columbus, Bloomington, Seymour, Indianapolis, and other Indiana cities.
2. In or about February and March 2015, defendants TONY MICHAEL, AMBER MORGAN, and BARBARA DUNCAN used credit cards and other items in victims' names contained in the stolen mail. The defendants used these items at gas stations and banks in Seymour, Indiana.
3. Defendant AMBER MORGAN also used the stolen mail to research personal information about victims on the Internet.
4. Defendants AMBER MORGAN and TONY MICHAEL used the personal information about victims to, among other things, open online accounts with internet retailers and submitted fraudulent tax returns in the victims' names, using the victims' Social Security

Numbers. At least one of these submissions was accepted and paid by the Internal Revenue Service. AMBER MORGAN listed addresses of vacant homes as the victims' purported addresses on the fraudulent tax returns, and cell phone numbers belonging to AMBER MORGAN and TONY MICHAEL were listed as the victims' purported phone numbers.

Count 1
18 U.S.C. §§ 1708 and 2
(Possession of Stolen Mail Matter)

5. Paragraphs 1 through 4 of the General Allegations section of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

6. On or about March 6, 2015, within the Southern District of Indiana,

**TONY MICHAEL,
AMBER MORGAN, and
BARBARA DUNCAN,**

defendants herein, unlawfully possessed any letter, postal card, package, bag, or mail, or any article or thing contained therein, knowing the same to be stolen, taken, embezzled, or abstracted.

In violation of Title 18, United States Code, Sections 1708 and 2.

Counts 2-6
18 U.S.C. §§ 1029(a)(5) and 2
(Use of Access Devices Issued to Others & Aiding and Abetting)

7. Paragraphs 1 through 4 of the General Allegations section of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

8. On or about the dates specified below, within the Southern District of Indiana,

**TONY MICHAEL and
AMBER MORGAN,**

defendants herein, knowingly and with intent to defraud, effected transactions as detailed below, with an access device issued to other persons, to receive payment and things of value in aggregate of \$1,000 or more, with said conduct affecting interstate and foreign commerce.

COUNT	DATE	DEFENDANT	ACCESS DEVICE	AMOUNT
2	2/17/2015	MORGAN	Tax return submitted in victim B.B.'s name and Social Security Number	\$2,666
3	2/19/2015	MORGAN	Tax return submitted in victim J.D.'s name and Social Security Number	\$9,602
4	3/3/2015	MORGAN	Tax return submitted in victim E.S.'s name and Social Security Number	\$5,038
5	3/5/2015	MICHAEL	Tax return submitted in victim C.A.'s name and Social Security Number	\$3,405
6	3/1/2015	MICHAEL	Tax return submitted in victim E.C.'s name and Social Security Number	\$3,405

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

Count 7
18 U.S.C. §§ 1028A and 2
(Aggravated Identity Theft & Aiding and Abetting)

9. Paragraphs 1 through 4 of the General Allegations section of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

10. On or about March 3, 2015, in relation to Count 4 charged above,

AMBER MORGAN,

the defendant herein, within the Southern District of Indiana, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person.

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

Count 8
18 U.S.C. §§ 1028A and 2
(Aggravated Identity Theft & Aiding and Abetting)

11. Paragraphs 1 through 4 of the General Allegations section of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

12. On or about March 5, 2015, in relation to Count 5 charged above,

TONY MICHAEL,

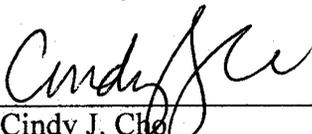
the defendant herein, within the Southern District of Indiana, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person.

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

A TRUE BILL:


FOR PERSON

JOSH J. MINKLER
United States Attorney

By: 
Cindy J. Cho
Bradley P. Shepard
Assistant United States Attorneys