

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 287 - False Claims
(14 counts)

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

18 U.S.C. § 287 - 5 years prison, \$250,000 fine, 3 years supervised release, \$100 assessment



PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCP 20, 21 or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) CYNTHIA L. STIER, AUSA, Tax Division

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

**Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment*

Comments:

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DEFENDANT - U.S. CLERK, U.S. DISTRICT COURT
DENISE LASHAWN REED

DISTRICT COURT NUMBER

CR 12 878

DEFENDANT

IS NOT IN CUSTODY

YGR

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges

Fed'l State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Date/Time:

Before Judge:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED

DEC 18 P 3:30

U.S. DISTRICT COURT
OAKLAND, CALIF.

Handwritten scribbles and marks on the left margin.

[REDACTED]

UNITED STATES OF AMERICA,

v.

DENISE LASHAWN REED,
a/k/a Brooke Nicholson, Lauren Roberts,
Denise Berry, Savana Jones, Neyce
Roberts,

CR 12 878

DEFENDANT(S).

YGR

INDICTMENT

18 U.S.C. § 287 - False Claims

A true bill.

J. Scha

Foreman

Filed in open court this 18 day of

Dec 20 2012
J. Cousins

Clerk

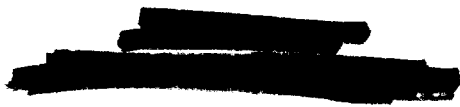
Bail, \$ no bail arrest warrant

Nathanael Cousins

Nathanael Cousins
United States Magistrate Judge

MELINDA HAAG (CABN 132612)
United States Attorney

FILED
2012 DEC 18 P 3:30
RICHARD W. WIERING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
DENISE LASHAWN REED,)
a/k/a Brooke Nicholson, Lauren Roberts,)
Denise Berry, Savana Jones, Neyce Roberts,)
Defendant.)

CR 12 878

VIOLATIONS: 18 U.S.C. § 287 - False
Claims to United States Agency

OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 287 - Filing False Claim)

1. On or about January 28, 2009, in the Northern District of California, the
defendant,

DENISE LASHAWN REED,
a/k/a Brooke Nicholson,
a/k/a Lauren Roberts,
a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
of the United States Department of Treasury, a claim against the United States for payment of a

1 refund of taxes in the amount of \$6,097, which she then and there knew to be false, fictitious, and
2 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
3 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
4 year 2008 in the name of S.C. that requested a refund to which the defendant knew she was not
5 entitled.

6 All in violation of Title 18, United States Code, Section 287.

7 COUNT TWO: (18 U.S.C. § 287 - Filing False Claim)

8 2. On or about January 16, 2010, in the Northern District of California, the
9 defendant,

10 DENISE LASHAWN REED,
11 a/k/a Brooke Nicholson,
12 a/k/a Lauren Roberts,
13 a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

14 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
15 of the United States Department of Treasury, a claim against the United States for payment of a
16 refund of taxes in the amount of \$6,337, which she then and there knew to be false, fictitious, and
17 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
18 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
19 year 2009 in the name of S.C. that requested a refund to which the defendant knew she was not
20 entitled.

21 All in violation of Title 18, United States Code, Section 287.

22 COUNT THREE: (18 U.S.C. § 287 - Filing False Claim)

23 3. On or about May 12, 2009, in the Northern District of California, the
24 defendant,

25 DENISE LASHAWN REED,
26 a/k/a Brooke Nicholson,
27 a/k/a Lauren Roberts,
28 a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

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1 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
2 of the United States Department of Treasury, a claim against the United States for payment of a
3 refund of taxes in the amount of \$5,702, which she then and there knew to be false, fictitious, and
4 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
5 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
6 year 2008 in the name of J.D. that requested a refund to which the defendant knew she was not
7 entitled.

8 All in violation of Title 18, United States Code, Section 287.

9 COUNT FOUR: (18 U.S.C. § 287 - Filing False Claim)

10 4. On or about January 21, 2010, in the Northern District of California, the
11 defendant,

12 DENISE LASHAWN REED,
13 a/k/a Brooke Nicholson,
14 a/k/a Lauren Roberts,
15 a/k/a Denise Berry,
16 a/k/a Savana Jones,
17 a/k/a Neyce Roberts,

18 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
19 of the United States Department of Treasury, a claim against the United States for payment of a
20 refund of taxes in the amount of \$6,717, which she then and there knew to be false, fictitious, and
21 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
22 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
23 year 2009 in the name of J.D. that requested a refund to which the defendant knew she was not
24 entitled.

25 All in violation of Title 18, United States Code, Section 287.

26 COUNT FIVE: (18 U.S.C. § 287 - Filing False Claim)

27 5. On or about May 21, 2009, in the Northern District of California, the
28 defendant,

DENISE LASHAWN REED,
a/k/a Brooke Nicholson,
a/k/a Lauren Roberts,
a/k/a Denise Berry,

1 a/k/a Savana Jones,
2 a/k/a Neyce Roberts,

3 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
4 of the United States Department of Treasury, a claim against the United States for payment of a
5 refund of taxes in the amount of \$6,000, which she then and there knew to be false, fictitious, and
6 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
7 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
8 year 2008 in the name of J.F. that requested a refund to which the defendant knew she was not
9 entitled.

10 All in violation of Title 18, United States Code, Section 287.

11 COUNT SIX: (18 U.S.C. § 287 - Filing False Claim)

12 6. On or about May 29, 2009, in the Northern District of California, the
13 defendant,

14 DENISE LASHAWN REED,
15 a/k/a Brooke Nicholson,
16 a/k/a Lauren Roberts,
17 a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

18 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
19 of the United States Department of Treasury, a claim against the United States for payment of a
20 refund of taxes in the amount of \$7,566, which she then and there knew to be false, fictitious, and
21 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
22 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
23 year 2008 in the name of R.J. that requested a refund to which the defendant knew she was not
24 entitled.

25 All in violation of Title 18, United States Code, Section 287.

26 COUNT SEVEN: (18 U.S.C. § 287 - Filing False Claim)

27 7. On or about February 1, 2010, in the Northern District of California, the
28 defendant,

DENISE LASHAWN REED,
a/k/a Brooke Nicholson,
a/k/a Lauren Roberts,
a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency of the United States Department of Treasury, a claim against the United States for payment of a refund of taxes in the amount of \$4,496, which she then and there knew to be false, fictitious, and fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the year 2009 in the name of R.J. that requested a refund to which the defendant knew she was not entitled.

All in violation of Title 18, United States Code, Section 287.

COUNT EIGHT: (18 U.S.C. § 287 - Filing False Claim)

8. On or about May 4, 2009, in the Northern District of California, the defendant,

DENISE LASHAWN REED,
a/k/a Brooke Nicholson,
a/k/a Lauren Roberts,
a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency of the United States Department of Treasury, a claim against the United States for payment of a refund of taxes in the amount of \$7,611, which she then and there knew to be false, fictitious, and fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the year 2008 in the name of R.K. that requested a refund to which the defendant knew she was not entitled.

All in violation of Title 18, United States Code, Section 287.

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1 COUNT NINE: (18 U.S.C. § 287 - Filing False Claim)

2 9. On or about January 25, 2010, in the Northern District of California, the
3 defendant,

4 DENISE LASHAWN REED,
5 a/k/a Brooke Nicholson,
6 a/k/a Lauren Roberts,
7 a/k/a Denise Berry,
8 a/k/a Savana Jones,
9 a/k/a Neyce Roberts,

10 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
11 of the United States Department of Treasury, a claim against the United States for payment of a
12 refund of taxes in the amount of \$9,360, which she then and there knew to be false, fictitious, and
13 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
14 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
15 year 2009 in the name of R.K. that requested a refund to which the defendant knew she was not
16 entitled.

17 All in violation of Title 18, United States Code, Section 287.

18 COUNT TEN: (18 U.S.C. § 287 - Filing False Claim)

19 10. On or about April 16, 2009, in the Northern District of California, the
20 defendant,

21 DENISE LASHAWN REED,
22 a/k/a Brooke Nicholson,
23 a/k/a Lauren Roberts,
24 a/k/a Denise Berry,
25 a/k/a Savana Jones,
26 a/k/a Neyce Roberts,

27 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
28 of the United States Department of Treasury, a claim against the United States for payment of a
refund of taxes in the amount of \$8,326, which she then and there knew to be false, fictitious, and
fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
year 2008 in the name of J.O. that requested a refund to which the defendant knew she was not

1 entitled.

2 All in violation of Title 18, United States Code, Section 287.

3 COUNT ELEVEN: (18 U.S.C. § 287 - Filing False Claim)

4 11. On or about March 11, 2009, in the Northern District of California, the
5 defendant,

6 DENISE LASHAWN REED,
7 a/k/a Brooke Nicholson,
8 a/k/a Lauren Roberts,
9 a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

10 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
11 of the United States Department of Treasury, a claim against the United States for payment of a
12 refund of taxes in the amount of \$4,124, which she then and there knew to be false, fictitious, and
13 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
14 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
15 year 2008 in the name of D.R. that requested a refund to which the defendant knew she was not
16 entitled.

17 All in violation of Title 18, United States Code, Section 287.

18 COUNT TWELVE: (18 U.S.C. § 287 - Filing False Claim)

19 12. On or about July 14, 2009, in the Northern District of California, the
20 defendant,

21 DENISE LASHAWN REED,
22 a/k/a Brooke Nicholson,
23 a/k/a Lauren Roberts,
24 a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

25 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
26 of the United States Department of Treasury, a claim against the United States for payment of a
27 refund of taxes in the amount of \$8,424, which she then and there knew to be false, fictitious, and
28 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and

1 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
2 year 2008 in the name of L.W. that requested a refund to which the defendant knew she was not
3 entitled.

4 All in violation of Title 18, United States Code, Section 287.

5 COUNT THIRTEEN: (18 U.S.C. § 287 - Filing False Claim)

6 13. On or about January 27, 2010, in the Northern District of California, the
7 defendant,

8 DENISE LASHAWN REED,
9 a/k/a Brooke Nicholson,
10 a/k/a Lauren Roberts,
11 a/k/a Denise Berry,
12 a/k/a Savana Jones,
13 a/k/a Neyce Roberts,

14 a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
15 of the United States Department of Treasury, a claim against the United States for payment of a
16 refund of taxes in the amount of \$8,424, which she then and there knew to be false, fictitious, and
17 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
18 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
19 year 2009 in the name of L.W. that requested a refund to which the defendant knew she was not
20 entitled.

21 All in violation of Title 18, United States Code, Section 287.

22 COUNT FOURTEEN: (18 U.S.C. § 287 - Filing False Claim)

23 14. On or about January 27, 2010, in the Northern District of California, the
24 defendant,

25 DENISE LASHAWN REED,
26 a/k/a Brooke Nicholson,
27 a/k/a Lauren Roberts,
28 a/k/a Denise Berry,
a/k/a Savana Jones,
a/k/a Neyce Roberts,

a resident of Dublin, California, made and presented to the Internal Revenue Service, an agency
of the United States Department of Treasury, a claim against the United States for payment of a

1 refund of taxes in the amount of \$7,818, which she then and there knew to be false, fictitious, and
2 fraudulent. REED made the claim by preparing and causing to be prepared, and presenting and
3 causing to be presented to said agency, a U.S. Individual Income Tax Return, Form 1040, for the
4 year 2009 in the name of M.M. that requested a refund to which the defendant knew she was not
5 entitled.

6 All in violation of Title 18, United States Code, Section 287.

7
8 A True Bill

9
10 Dated: 12-18-12

J. Scha
11 FOREPERSON

12 MELINDA HAAG
13 United States Attorney

J. Joseph Cas Wilton for
14 MIRANDA KANE
15 Chief, Criminal Division

16
17 Approved as to Form

18
19 Cynthia Stier
20 CYNTHIA STIER
21 Assistant United States Attorney
22 Tax Division
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United States District Court
Northern District of California

FILED
DEC 18 P 3:30
RECEIVED
U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CRIMINAL COVER SHEET

Instructions: Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case. Please place this form on top of the Defendant Information Form.

Case Name:

[REDACTED]

CR

Case Number:

12

878

USA v. DENISE LASHAWN REED

Total Number of Defendants:

1 2-7 _____ 8 or more _____

Is This Case Under Seal?

Yes No _____

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes _____ No

Venue (Per Crim. L.R. 18-1):

SF _____ OAK SJ _____

Is this a death-penalty-eligible RICO Act gang case?

Yes _____ No

Assigned AUSA (Lead Attorney):

CYNTHIA L. STIER, AUSA, TAX DIV.

Comments:

[Empty box for comments]

Date Submitted:

12/18/12