

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>12-539</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: March 11, 2014</b>
<b>TANIKA VICTORIA LITTLE</b>	<b>:</b>	<b>VIOLATION:</b>
	<b>:</b>	<b>18 U.S.C. § 656 (bank</b>
	<b>:</b>	<b>embezzlement – two counts)</b>
	<b>:</b>	<b>26 U.S.C. § 7201 (tax evasion – 1</b>
	<b>:</b>	<b>count)</b>
		<b>Notice of forfeiture</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this Indictment:

1. Brink's Inc. was an armored truck service which contracted with Bank of America, whose deposits are insured by the Federal Deposit Insurance Corporation, to transport bags of currency by armored vehicle from Brink's Inc. on Holstein Avenue in Philadelphia to various nearby Bank of America branches.

2. Defendant TANIKA VICTORIA LITTLE was employed full-time as a messenger for Brink's Inc. In 2011, she reported that her yearly earnings as a messenger for Brink's Inc. was \$41,106. Her duties included accepting and distributing the currency and cargo entrusted to Brink's Inc. by Bank of America.

3. On or about February 15, 2011, defendant TANIKA VICTORIA LITTLE received sealed bags containing United States currency that were to be delivered to Bank of

America, 3100 Garrett Road, Drexel Hill, PA. Part of that delivery was an incorrectly routed bag containing \$18,000 in United States currency in \$20 denominations. At the termination of the route, defendant LITTLE returned the Brink's Inc. delivery manifest to her employer indicating that the bag containing \$18,000 had been delivered to the Drexel Hill branch.

4. On or about March 1, 2011, defendant TANIKA VICTORIA LITTLE again received sealed bags containing United States currency that were to be delivered to Bank of America, 3100 Garrett Road, Drexel Hill, PA. Part of that delivery was an incorrectly routed bag containing \$92,000 in United States currency in \$20 denominations. At the termination of the route, defendant LITTLE returned the Brink's Inc. delivery manifest to her employer indicating that the bag containing \$92,000 had been delivered to the Drexel Hill branch.

5. On or about March 1, 2011, Bank of America Drexel Hill branch employees discovered that the bag reportedly delivered to the branch on February 15, 2011, containing \$18,000 was missing and, other than the manifest, could not find any evidence that it had been delivered. Later in the month, the same employees discovered that the bag reportedly delivered to the branch on March 1, 2011, containing \$92,000 was missing and, other than the manifest, could not find any evidence that it had been delivered. Thus, a total of \$110,000 missing from Bank of America's Drexel Hill branch could be traced directly to deliveries that were to be made by defendant TANIKA VICTORIA LITTLE.

6. Between March 2, 2011 and June 1, 2011, defendant TANIKA VICTORIA LITTLE deposited approximately \$41,840 in cash in \$20 denominations into three different bank accounts, many while driving a blue 2010 Jeep Cherokee, PA tag HLT-1071, VIN 1J4PR4GK7AC143007, registered to defendant LITTLE.

7. On or about April 15, 2011, defendant TANIKA VICTORIA LITTLE prepared a written statement for her tax return preparer and questioned whether she could “claim work done on my house,” including “remodel bathroom \$2000.00,” “remodel kitchen \$4300.00,” “Basement \$8500.00,” and “front of house rebricked \$9000.00.” In 2011, defendant LITTLE had improvements performed to her home’s exterior and interior.

8. On June 29, 2011, within an eight-hour period, defendant TANIKA VICTORIA LITTLE purchased 27 money orders, totaling approximately \$13,000, with cash from eight different retail establishments in South Philadelphia, PA.

9. On or about February 15, 2011, in the Eastern District of Pennsylvania, defendant

**TANIKA VICTORIA LITTLE,**

being an agent of and connected to a federally insured bank in her capacity as an employee of Brink’s, Inc., an armored truck service responsible for delivering United States currency for and to Bank of America, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, with intent to injure and defraud Bank of America, embezzled, purloined, and misapplied the sum of approximately \$18,000.00 of the moneys entrusted to the custody or care of the defendant, in that the defendant stole the bag of cash.

In violation of Title 18, United States Code, Section 656.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs One through Eight of Count One are realleged here.
2. On or about March 1, 2011, in the Eastern District of Pennsylvania,

defendant

**TANIKA VICTORIA LITTLE,**

being an agent of and connected to a federally insured bank in her capacity as an employee of Brink's, Inc., an armored truck service responsible for delivering United States currency for and to Bank of America, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, with intent to injure and defraud Bank of America, embezzled, purloined, and misapplied the sum of approximately \$92,000.00 of the moneys entrusted to the custody or care of the defendant, in that the defendant stole the bag of cash.

In violation of Title 18, United States Code, Section 656.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs One through Eight of Count One are realleged here.
2. On or about April 16, 2012, in the Eastern District of Pennsylvania,

defendant

**TANIKA VICTORIA LITTLE,**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged here.
2. On or about April 16, 2012, in the Eastern District of Pennsylvania,

defendant

**TANIKA VICTORIA LITTLE,**

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat a large part of the tax due and owing by her to the United States of America for the calendar year 2011 by:

(1) filing and causing to be filed with the Director, Internal Revenue Service Center, at Philadelphia, Pennsylvania, a false and fraudulent United States individual income tax return, Form 1040, as head of household, in which it was stated that her total gross income was \$28,870, but, as she then well knew and believed that her total gross income was approximately \$138,870, and that upon \$138,870 income there was owing to the United States of America an additional tax of approximately \$25,902; and,

(2) concealing sources and amounts of her true and correct income by making false and deceptive statements to the tax return preparer who prepared and filed her

income tax return.

In violation of Title 26, United States Code, Section 7201.

## **NOTICE OF FORFEITURE**

1. As a result of the violations of Title 18, United States Code, Sections 656 set forth in this Superseding Indictment, defendant

### **TANIKA VICTORIA LITTLE**

shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- (a) a \$14,999.99 interest in the real property and all improvements commonly known as 2041 S. Opal Street, Philadelphia, PA 19145, as proceeds derived from or traceable to the bank embezzlement offenses;
- (b) a \$14,000 interest in personal property and all improvements commonly known as a blue 2010 Jeep Cherokee, PA tag HLT-1071, VIN 1J4PR4GK7AC143007, as proceeds derived from or traceable to the bank embezzlement offenses;
- (c) the sum of \$110,000 in United States currency (forfeiture money judgment).

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(1) and (a)(2)(A).

**A TRUE BILL:**

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**FOREPERSON**

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**ZANE DAVID MEMEGER**  
United States Attorney