

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

FILED
12/17/14
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA
v.
TANIKA HAWKINS.

Criminal Case No. _____
In Violation of 18 U.S.C. §§ 1343, 2 and
1028A.

CR 14 138 M

INDICTMENT

The Grand Jury charges that:

Introduction

1. At all times material to this Indictment, STJ is a jewelry store located in Providence, Rhode Island whose identity is known to the Grand Jury, and CitiBank is a credit card issuer located in Sioux Falls, South Dakota.
2. At all times material to this Indictment, PDC is a jewelry store located in Cranston, Rhode Island and whose identity is known to the Grand Jury, and GE Retail Capital Bank is a credit card issuer located in Draper, Utah.
3. At all times material to this Indictment, A.B. is an individual who resides in Ohio and whose identify is known to the Grand Jury.

COUNT I
(Wire Fraud)

Object of the Scheme to Defraud

4. On or about August 2, 2014, in the District of Rhode Island, Defendant TANIKA HAWKINS knowingly and willfully devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property belonging to STJ by means of false and fraudulent pretenses, representations, and promises.
5. The object of the scheme was for Defendant TANIKA HAWKINS to obtain and attempt to obtain credit from a credit card issuer using the name A.B. and ^{to} ~~would~~ purchase and attempt to purchase merchandise from STJ with that credit.

Manner and Means

6. It was part of the scheme to defraud that Defendant TANIKA HAWKINS

presented herself to STJ as A.B.

7. It was further part of the scheme to defraud that Defendant TANIKA HAWKINS had STJ submit a credit application to CitiBank using A.B.'s personal identification information, including the name, address, and date of birth of A.B.

8. It was further part of the scheme to defraud that Defendant TANIKA HAWKINS, as part of the credit application process, presented to STJ what appeared to be an Ohio driver's license bearing an image of Defendant TANIKA HAWKINS but the name, address, and date of birth of A.B.

9. It was further part of the scheme to defraud that Defendant TANIKA HAWKINS used the credit obtained from CitiBank in the name of A.B. to purchase a Rolex watch and diamond earrings from STJ.

Execution of Scheme

10. On or about August 2, 2014, in the District of Rhode Island, for the purpose of executing the aforementioned scheme and artifice to defraud and obtain and attempt to obtain money and property by means of false statements and representations and promises Defendant TANIKA HAWKINS knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, and signals, specifically a credit application that includes the name, address, and date of birth of A.B.,

all in violation of 18 U.S.C. §§ 1343, 2

COUNT II (Aggravated Identity Theft)

11. The allegations in paragraphs 1 through 10 above are herein realleged and incorporated by reference.

12. On or about August 2, 2014, in the District of Rhode Island, Defendant TANIKA HAWKINS, during and in relation to the felony offense of wire fraud as charged in Count I, did knowingly possess and use, without lawful authority, means of

identification of another person, including the name, address, and date of birth of A.B., all in violation of 18 U.S.C. § 1028A.

COUNT III
(Wire Fraud)

Object of the Scheme to Defraud

13. On or about August 2, 2014, in the District of Rhode Island, Defendant TANIKA HAWKINS knowingly and willfully devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property belonging to PDC by means of false and fraudulent pretenses, representations, and promises.

14. The object of the scheme was for Defendant TANIKA HAWKINS to obtain and attempt to obtain credit from a credit card issuer using the name of A.B. and ~~would~~ purchase and attempt to purchase merchandise from PDC with that credit.

Manner and Means

15. It was part of the scheme to defraud that Defendant TANIKA HAWKINS presented herself to PDC as A.B.

16. It was further part of the scheme to defraud that Defendant TANIKA HAWKINS had PDC provide her a means of submitting a credit application to G.E. Retail Capital Bank and used that means to submit a credit application to the bank using A.B.'s personal identification information, including the name, address, and date of birth of A.B.

17. It was further part of the scheme to defraud that Defendant TANIKA HAWKINS, as part of the credit application process, presented to PDC what appeared to be an Ohio driver's license bearing an image of Defendant TANIKA HAWKINS but the name, address, and date of birth of A.B.

Execution of Scheme

18. On or about August 2, 2014, in the District of Rhode Island, for the purpose of executing the scheme and artifice to defraud and obtain and attempt to

obtain money and property by means of false statements and representations and promises Defendant TANIKA HAWKINS transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, and signals, specifically a credit application that includes the name, address, and date of birth of A.B.,

all in violation of 18 U.S.C. §§ 1343, 2

COUNT IV
(Aggravated Identity Theft)

19. The allegations in paragraphs 1 through 18 above are herein realleged and incorporated by reference.

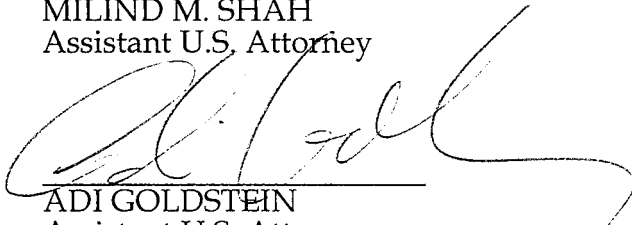
20. On or about August 2, 2014, in the District of Rhode Island, Defendant TANIKA HAWKINS, during and in relation to the felony offense of wire fraud as charged in Count III, did knowingly possess and use, without lawful authority, means of identification of another person, including the name, address, and date of birth of A.B.,

all in violation of 18 U.S.C. § 1028A.

PETER F. NERONHA,
United States Attorney



MILIND M. SHAH
Assistant U.S. Attorney



ADI GOLDSTEIN
Assistant U.S. Attorney
Chief, Criminal Division

A TRUE BILL:

REDACTED

Date: December 17, 2014

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

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO.

CR 14-138 M

Matter Sealed: Juvenile Other than Juvenile

USA vs.

Pre-Indictment Plea Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

Defendant: TANIKA HAWKINS

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM PETER F. NERONHA
 U.S. Atty Other U.S. Agency
 Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned) MILIND M. SHAH

Ad

REDACTED

B
D

Alien applicable)

S

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
United States Secret Service

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

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

this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Atty Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

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

SHOW DOCKET NO.

MAG. JUDGE CASE NO.

14-MJ-00175-PAS

Issue: Warrant Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): _____

FPD CJA RET'D

Appointed on Target Letter

Place of offense RHODE ISLAND County

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 4

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	SEE ATTACHED SHEET.		<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		ESTIMATED TRIAL DAYS: 4	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

**ATTACHMENT TO DEFENDANT INFORMATION RELATIVE TO A CRIMINAL
ACTION – IN U.S. DISTRICT COURT**

DEFENDANT: TANIKA HAWKINS

COUNT I: Wire Fraud - 18 U.S.C. § 1343, 2 – Felony.

MAXIMUM PENALTIES: 20 years imprisonment; a fine of \$250,000.00; 3 years of supervised release; and a mandatory special assessment of \$100.00.

COUNT II: Aggravated Identity Theft - 18 U.S.C. § 1028A – Felony.

MAXIMUM PENALTIES: A mandatory 2-year consecutive term of imprisonment; a fine of \$250,000.00; 3 years of supervised release; and a mandatory special assessment of \$100.00.

COUNT III: Wire Fraud - 18 U.S.C. § 1343, 2 – Felony.

MAXIMUM PENALTIES: 20 years imprisonment; a fine of \$250,000.00; 3 years of supervised release; and a mandatory special assessment of \$100.00.

COUNT IV: Aggravated Identity Theft - 18 U.S.C. § 1028A – Felony.

MAXIMUM PENALTIES: A mandatory 2-year consecutive term of imprisonment; a fine of \$250,000; 3 years of supervised release; and a mandatory special assessment of \$100.00.