

FELONY

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**SECOND SUPERSEDING INDICTMENT FOR CONSPIRACY,
AIDING AND ASSISTING IN MAKING AND SUBSCRIBING
A FALSE RETURN, ENDEAVORING TO INTERFERE
WITH THE ADMINISTRATION OF INTERNAL
REVENUE LAWS AND OBSTRUCTION OF JUSTICE**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 11-077
v.	*	SECTION: "L" (5)
SHONDRELL CAMPBELL	*	VIOLATION: 18 U.S.C. § 2
		18 U.S.C. § 371
		18 U.S.C. § 1503
	*	26 U.S.C. §7206(2)
		26 U.S.C. §7212(a)
	* * *	

The Grand Jury charges that:

COUNT 1

CONSPIRACY

A. AT ALL TIMES MATERIAL HEREIN:

1. The Internal Revenue Service is an agency of the Treasury Department of the United States of America responsible for administering and enforcing the tax laws of the United States, including the taxes paid into the treasury of the United States by its citizens.

2. The Internal Revenue Code provides that individuals may be entitled either to deduct specific types of expenditures from their individual tax returns in certain instances or obtain refunds based on prior taxes paid, including the following: purchasing a home for the first time (“First Time Home Buyer’s Credit”), incurring student loan interest, paying for adult education, incurring expenses for having a dependent, deriving income or loss from a business, and, in tax year 2006, the Telephone Excise Tax Refund (“TETR”). TETR was a one-time credit available on 2006 income tax returns designed to refund previously-collected federal excise taxes on long-distance telephone service paid from March 2003 through June 2006.

3. From on or about November 15, 2002, through on or about the present, the defendant, **SHONDRELL CAMPBELL** owned Unlimited Tax Service, a tax preparation business located at 75 Dominican Drive, LaPlace, Louisiana 70068. **CAMPBELL** possessed and distributed business cards listing her fax number as (985) 652-6907. During the time the defendant operated Unlimited Tax Service, **SHONDRELL CAMPBELL** engaged and assisted in the preparation of false and fraudulent financial income tax returns.

4. **Individual 1** was married to **SHONDRELL CAMPBELL**, and **Individual 1** assisted his wife in the tax preparation business.

5. **Individual 2** was the sister of **SHONDRELL CAMPBELL**.

6. **Individual 3** was the sister of **SHONDRELL CAMPBELL** and resided in Grand Prairie, Texas.

7. **Individual 4** was the cousin of **SHONDRELL CAMPBELL**.

8. **Individual 5** was the aunt of **SHONDRELL CAMPBELL**

9. **Individual 6** was the mother of **SHONDRELL CAMPBELL**, as well as the mother

of **Individual 2** and **Individual 3**.

10. A tax business must obtain an Electronic Filer's Identification Number (EFIN) in order to electronically prepare and transmit, via computer, tax returns to the Internal Revenue Service. An EFIN also allows a return preparer the ability to offer a variety of tax refund products including cashier's checks, pre-paid cash cards, or debit cards.

11. In or about early 2005, agents of the Internal Revenue Service - Criminal Investigation Division, began investigating **SHONDRELL CAMPBELL** for the filing of false and fraudulent tax returns under her personal EFIN, Number 726605.

B. THE CONSPIRACY:

From on about a time unknown, but as early as January 1, 2004, to on or about April 27, 2007, in the Eastern District of Louisiana and elsewhere, the defendant, **SHONDRELL CAMPBELL**, and others known and unknown to the Grand Jury, knowingly and willfully combined, conspired, and agreed with each other to:

- a. willfully aide and assist in, and procure, counsel, and advise the preparation and production to the Internal Revenue Service of several false and fraudulent U.S. Individual Income Tax Returns, Form 1040, in violation of Title 26, United States Code, Section 7206(2); and
- b. corruptly endeavor to obstruct and impeded the due administration of the internal revenue laws, in violation of Title 26, United States Code, Section 7212(a).

C. OVERT ACTS:

In furtherance of the conspiracy, and to achieve the objects thereof, the defendant,

SHONDRELL CAMPBELL, and others known and unknown to the Grand Jury, committed at least one of the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. On or about November 26, 2002, **SHONDRELL CAMPBELL** applied for and was granted EFIN Number 726605. On her application, **CAMPBELL** represented her fax number to be (985) 651-4663.

2. Between on or about January 1, 2004, and continuing until on or around April 15, 2004, **CAMPBELL** directed **Individual 1** to approach certain individuals and purchase their names, dates of birth, and Social Security Numbers to be used to create and file fraudulent tax returns.

3. Between on or about January 1, 2004, and continuing until on or around April 15, 2004, **CAMPBELL** prepared and caused to be prepared false and fraudulent tax returns in the names of persons from whom **Individual 1** had obtained names, dates of birth, and Social Security Numbers.

4. **CAMPBELL** then filed the fraudulent returns and arranged for the fraudulent refunds to be deposited directly into bank accounts under the control of the defendant, **SHONDRELL CAMPBELL**.

5. From on or about April 11, 2005, through on or about April 27, 2011, the defendant, **SHONDRELL CAMPBELL**, directed others, including **Individual 2**, **Individual 3**, **Individual 4**, and **Individual 5**, to apply for EFINS and using bank accounts controlled by others, including **Individual 3**, **Individual 4**, and **Individual 6**, to hide from the IRS the fact that **CAMPBELL** was the ultimate recipient of the proceeds of the fraudulent returns.

6. On or about April 11, 2005, **Individual 2**, doing business as Fast Tax Unlimited, applied for and was granted EFIN Number 721355. Fast Tax Unlimited was located at 75

Dominican Drive, LaPlace, Louisiana 70068, the same address as Unlimited Tax Service. In filings with the Louisiana Secretary of State, **Individual 2** was listed as the manager of Fast Tax Unlimited, and **SHONDRELL CAMPBELL** was listed as the registered agent, as well as a member, of Fast Tax Unlimited.

7. On or about June 15, 2005, **SHONDRELL CAMPBELL** opened a bank account at Community Bank, located in Raceland, Louisiana, in the name of Fast Tax Unlimited. **SHONDRELL CAMPBELL** was the only person listed on Fast Tax Unlimited's account at Community Bank, and the only contact information listed on the account was that of **SHONDRELL CAMPBELL**.

8. On or about February 1, 2006, EFIN Number 726605, issued to the defendant, **SHONDRELL CAMPBELL**, was suspended by the Internal Revenue Service because of "unethical practices in return preparation."

9. On or about February 1, 2006, EFIN Number 721355, issued to Fast Tax Unlimited, was suspended by the Internal Revenue Service because of "unethical practices in return preparation," namely the preparation of false tax returns that contain unsubstantiated income.

10. On or about February 16, 2006, **Individual 3**, doing business as Tax by Shondrelyn, applied for and was granted EFIN Number 756824. Tax by Shondrelyn purported to be located at 2303 West Pioneer Parkway, Grand Prairie, Texas 75051. **Individual 6** was listed on the EFIN application as an alternate contact for Tax by Shondrelyn. Although the application for an EFIN was in the name of **Individual 3**, the fax number listed on the application was (985) 652-6907, a Louisiana fax number belonging to **SHONDRELL CAMPBELL**.

11. On or about February 18, 2006, **Individual 3** gave her mother, **Individual 6**, power

of attorney over a Louisiana Credit Union bank account (ending in 84332) controlled by **Individual 3**.

12. On or about December 26, 2006, EFIN Number 756824, issued to **Individual 3**, doing business as Tax by Shondrelyn, was suspended by the Internal Revenue Service for “allow[ing] a suspended tax preparer to prepare and transmit fraudulent tax returns” using EFIN Number 756824. The suspended tax preparer that caused EFIN Number 756824 to be suspended was the defendant, **SHONDRELL CAMPBELL**.

13. On or about May 19, 2006, **CAMPBELL** directed her cousin, **Individual 4**, to apply for an EFIN Number. **Individual 4** then applied for, and was granted, an EFIN Number 721972. Although the application was in the name of **Individual 4**, the fax number listed on the application was (985) 652-6907, a Louisiana fax number belonging to **SHONDRELL CAMPBELL**.

14. Between on or about January 1, 2007, and continuing until on or around April 15, 2007, the defendant, **SHONDRELL CAMPBELL**, used EFIN Number 721972, which had been applied for and obtained by her cousin, **Individual 4**, to file additional tax returns and disguise **CAMPBELL’S** involvement in the preparation and filing of tax returns.

15. Between on or about January 1, 2007, and continuing until on or around April 15, 2007, **CAMPBELL** prepared and caused to be prepared approximately 879 false and fraudulent tax returns using EFIN Number 721972, which was applied for and obtained by her cousin, **Individual 4**, for tax year 2006, including one, in the name of LG, well knowing that the information **CAMPBELL** included therein (namely the presence of a false TETR credit) was false.

16. **CAMPBELL** disguised her involvement in the filings by representing the Social Security Number of the tax preparer to be 123-456-789, even though **CAMPBELL’S** true and

correct Social Security Number was XXX-XX-4300.

17. **CAMPBELL** further arranged for the fees from the fraudulently filed tax returns filed using EFIN Number 721972, worth approximately \$108,457.00, to be deposited into **Individual 4** personal bank account and then withdrawn and paid over to **CAMPBELL** in cash.

18. **CAMPBELL** explicitly instructed **Individual 4** to pay her in cash instead of check because **CAMPBELL** did not want to be linked to the illicit filings under EFIN Number 721972.

19. On or about April 22, 2008, **Individual 4** notified the Internal Revenue Service that EFIN Number 721972 had been compromised, causing EFIN Number 721972 to be suspended and a new EFIN, Number 723862, to be issued to **Individual 4** automatically. On or about December 29, 2008, **Individual 4** cancelled EFIN Number 723862.

20. On or about June 1, 2007, **CAMPBELL** directed her aunt, **Individual 5**, to apply for and obtain an EFIN Number. **Individual 5** complied and applied for an EFIN; **Individual 5** was granted EFIN Number 722620. Although the application was in the name of **Individual 5**, the fax number listed on the application was (985) 651-4663, the same fax number **SHONDRELL CAMPBELL** listed on her application for an EFIN on or about November 26, 2002.

21. Using **Individual 5's** EFIN, Number 722620, the defendant, **SHONDRELL CAMPBELL**, submitted numerous false and fraudulent tax returns. Furthermore, **CAMPBELL** arranged for the return preparation fees generated by the EFIN **Individual 5** received, Number 722620, to be deposited into bank accounts at MidSouth Bank, N.A. and First American Bank and Trust that were controlled by the defendant, **SHONDRELL CAMPBELL**.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-18

AIDING AND ASSISTING IN THE PREPARATION AND PRODUCTION OF FALSE AND FRAUDULENT TAX RETURNS

A. AT ALL TIMES MATERIAL HEREIN:

The allegations of Parts A and C of Count 1 are hereby realleged and incorporated herein in their entirety by reference.

B. AIDING AND ASSISTING IN THE PREPARATION AND PRODUCTION OF FALSE AND FRAUDULENT TAX RETURNS:

On or about the dates herein set forth below, in the Eastern District of Louisiana and elsewhere, the defendant, **SHONDRELL CAMPBELL**, a resident of Laplace, Louisiana, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of U.S. Individual Income Tax Returns, Forms 1040, either individual or joint, for the tax payers in calendar years herein specified below which were false and fraudulent as to material matters. Specifically, the income tax returns were false and fraudulent in that they represented the said tax payers were entitled under the provisions of the Internal Revenue Laws to claim deductions for items hereinafter specified, whereas, as the defendants then and there well knew and believed, the said tax payers were not entitled to claim the deductions and said amounts, but of lesser amounts:

Count	Date Filed	Tax Payer	Tax Year	False Items	Fraudulent Amount Claimed
2	4-15-2005	ST	2004	wages, business income, and dependency exemptions	\$3,116.00
3	4-15-2005	RS	2004	wages, business income, and dependency exemptions	\$2,084.00

4	4-15-2005	SB	2004	dependency exemption and education credit	\$3,088.00
5	4-15-2005	DC & KC	2004	education credit and itemized deductions	\$2,656.00
6	4-15-2005	AE	2004	tuition and fees deductions and itemized deductions	\$5,330.00
7	4-15-2005	VM	2004	student loan interest and itemized deductions	\$6,615.00
8	4-15-2005	HM-A	2004	student loan interest, education credits and itemized deductions	\$2,055.00
9	4-15-2005	M & KS	2004	itemized deductions and education credits	\$4,104.00
10	4-15-2005	BY	2004	business income and dependency exemption	\$2,549.00
11	4-15-2005	PC	2004	wages, business income and dependency exemptions	\$2,890.00
12	4-15-2009	AL	2008	First Time Home Buyer's Credit	\$7,500.00
13	4-15-2009	BH	2008	First Time Home Buyer's Credit	\$7,500.00
14	4-15-2009	BM	2008	First Time Home Buyer's Credit	\$7,500.00
15	4-15-2009	PP	2008	First Time Home Buyer's Credit	\$7,500.00
16	4-15-2009	VD	2008	First Time Home Buyer's Credit	\$7,500.00
17	4-15-2007	AL	2006	TETR	\$1,135.00
18	4-15-2007	MM	2006	TETR	\$960.00
Total					\$74,082.00

In violation of Title 26, United States Code, Section 7206(2) and Title 18, United States Code, Section 2.

COUNT 19

**ENDEAVORING TO INTERFERE WITH
ADMINISTRATION OF INTERNAL REVENUE LAWS**

A. AT ALL TIMES MATERIAL HEREIN:

The allegations of Parts A and C of Count 1 are hereby realleged and incorporated herein in their entirety by reference.

**B. INTENTIONAL OBSTRUCTION WITH DUE ADMINISTRATION OF
INTERNAL REVENUE LAWS:**

That beginning on or about April 11, 2005, and continuing thereafter up to and including April 27, 2011, in the Eastern District of Louisiana, the defendant, **SHONDRELL CAMPBELL**, did corruptly endeavor to obstruct and impede the due administration of the internal revenue laws by:

a. Instructing **Individual 2** to apply for an EFIN fraudulently, so that **CAMPBELL** would still be able to file fraudulent tax returns electronically in the event her personal EFIN was suspended. Even though the EFIN application listed **Individual 2** as the manager of Fast Tax Unlimited, **SHONDRELL CAMPBELL** was listed as registered agent, and, further, the contact information for the bank account associated with that EFIN was that of **SHONDRELL CAMPBELL**;

b. Using fraudulently obtained EFIN Number 721355, issued to Fast Tax Unlimited, to file fraudulent tax returns;

c. Using fraudulently obtained EFIN Number 721355 to file fraudulent tax returns before that EFIN was suspended on or about February 1, 2006;

d. Causing all fees received from the fraudulent tax returns filed using fraudulently obtained EFIN Number 721355 to be deposited into a Community Bank account controlled by **SHONDRELL CAMPBELL**;

e. Directing **Individual 3** (d/b/a Tax by Shondrelyn), on or about February 9, 2006, shortly after the EFINs of **CAMPBELL** and **Individual 2** were suspended, to apply for and obtain EFIN Number 756824 fraudulently;

f. Using fraudulently obtained EFIN Number 756824 to continue filing fraudulent tax returns after her personal EFIN was suspended. **CAMPBELL** fraudulently used EFIN Number 756824 to file fraudulent tax returns for tax year 2005. **CAMPBELL** directed **Individual 3** and her mother to have the fees from the fraudulent tax returns filed using fraudulently obtained EFIN Number 756824 deposited into a bank account under the name of **Individual 3**, who lived in Texas, withdrawn by her mother, **Individual 6**, and delivered to **SHONDRELL CAMPBELL**. Fraudulently obtained EFIN Number 756824 was suspended on December 26, 2006;

g. Directing her aunt, **Individual 5**, to apply for and obtain EFIN Number 722620 fraudulently, on or about June 1, 2007, so that **CAMPBELL** could use fraudulently obtained EFIN Number 722620 to file additional fraudulent tax returns and disguise her involvement in the preparation and filing of fraudulent tax returns beginning on or about December 29, 2008, less than three weeks after **Individual 4's** fraudulently obtained EFINs were cancelled;

h. Using fraudulently obtained EFIN Number 722620 between January 17, 2009, and April 27, 2011, to file fraudulent tax returns for tax years 2008, 2009 and 2010; and

i. Arranging to have the fees from the fraudulent tax returns filed using a fraudulently obtained EFIN Number 722620, worth approximately \$189,161.90, deposited into banks accounts under **CAMPBELL'S** control located at MidSouth Bank, N.A. and First American Bank and Trust.

All in violation of Title 26, United States Code, Section 7212(a).

COUNT 20

OBSTRUCTION OF JUSTICE

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations of Parts A and C of Count 1 are hereby realleged and incorporated herein in their entirety by reference.

B. OBSTRUCTION OF JUSTICE:

Beginning at a time unknown, but prior to and continuing to on or about December 7, 2011, the defendant, **SHONDRELL CAMPBELL**, did corruptly endeavor to influence, obstruct, and impede the due administration of justice in the Federal Grand Jury in the United States District Court for the Eastern District of Louisiana, in that **SHONDRELL CAMPBELL**, knowing that a Federal Grand Jury had been and was currently investigating possible violations of federal law relating to **SHONDRELL CAMPBELL'S** fraudulent preparation of Federal tax returns, did knowingly and willfully counsel and attempt to influence **Individual 2**, to avoid service of a grand jury subpoena for December 8, 2011, and did further counsel **Individual 2** to refuse to testify before the Federal Grand Jury in the United States District Court for the Eastern District of Louisiana.

It was further a part of defendant **SHONDRELL CAMPBELL'S** attempt to corruptly endeavor to influence, obstruct, and impede the due administration of justice that the defendant,

SHONDRELL CAMPBELL, knew that **Individual 2** would give inculpatory evidence against defendant, **SHONDRELL CAMPBELL**, by testifying to the following:

1. The Form 8633 application for an electronic filing identification number (EFIN) was signed by **Individual 2**, and contained her identification information, but had **SHONDRELL CAMPBELL'S** post office box number as the contact address for the IRS.
2. A bank account at Community Bank opened in the name of Fast Tax was opened and controlled by the defendant, **SHONDRELL CAMPBELL**, to avoid detection of fees earned on fraudulent activities. **Individual 2** never had any control over the account and never made any deposits or withdrawals, and did not know of the existence of the account.
3. That the defendant, **SHONDRELL CAMPBELL**, had provided the address of P.O. Box 431, St. Rose, Louisiana 70087 as the contact address for the IRS.
4. That when **Individual 2's** EFIN was suspended for fraudulent activity, the suspension letter was sent to the defendant, **SHONDRELL CAMPBELL**, at the St. Rose, Louisiana post office box, therefore concealing the suspension from **Individual 2**.
5. That the defendant, **SHONDRELL CAMPBELL**, registered Fast Tax with the Louisiana Secretary of State with her contact information.
6. That **Individual 2** never filed any electronic tax returns on behalf of others.

7. **Individual 2** was unaware that any tax returns had been prepared and filed using the EFIN for which **Individual 2** applied.

All in violation of Title 18, United States Code, Sections 2 and 1503.

A TRUE BILL:

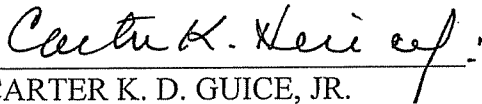
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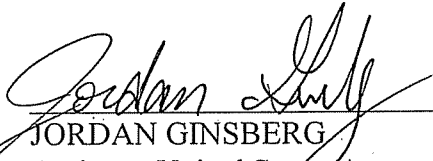
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New Orleans, Louisiana
January 26, 2012