

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Criminal No. 19-20128

Plaintiff,

Hon. Bernard A. Friedman

v.

VIO: 18 U.S.C. § 1343

18 U.S.C. § 2

D-1 TARA LYNN LEE,

18 U.S.C. § 1028A(a)(1)

D-2 ENHELICA NIEVES WIGGINS,

Defendants.

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FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. TARA LYNN LEE, a resident of Macomb County, Michigan, operated under the organization names Always Hope Pregnancy Center L.L.C., Always Hope Pregnancy and Education Center Inc., and TL Pregnancy Services (collectively LEE's companies). LEE matched pregnant women with families seeking to adopt children. LEE received payment from prospective adoptive parents for her services. Couples seeking to adopt also gave LEE money intended to reimburse birth mothers for their expenses.

2. ENHELICA NIEVES WIGGINS is a resident of Michigan. In 2018, she claimed to be interested in placing her child into adoption through LEE. WIGGINS also referred other birth mothers purportedly interested in adoption to LEE. On occasion, WIGGINS impersonated some of these women during phone calls with LEE and potential adoptive parents.

3. LEE and LEE's companies were not licensed child placing agencies under Michigan law.

4. M.S. and J.S. are residents of Colorado. In 2018, they were interested in adopting a child.

5. M.E. and J.E. are residents of Minnesota. In 2018, they were interested in adopting a child.

6. Jane Doe 1's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 1 was pregnant and due to deliver a baby girl in July 2018.

7. E.T. and C.T. are residents of Georgia. In 2018, they were interested in adopting a child.

8. L.C. and J.C. are residents of Michigan. In 2018, they were interested in adopting a child.

9. M.J. and N.J. are residents of Missouri. In 2018, they were interested in adopting a child.

10. C.L. and J.L. are residents of South Carolina. In 2018, they were interested in adopting a child.

11. Jane Doe 3 is a resident of Michigan. She was not pregnant in 2018.

12. E.L. and J.L.2 are residents of Indiana. In 2018, they were interested in adopting a child.

13. S.M. and P.M. are residents are Ohio. In 2018, they were interested in adopting a child.

14. Jane Doe 4's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 4 was pregnant and due to deliver a baby boy in December 2018.

15. M.B. and J.B. are residents of Kentucky. In 2018, they were interested in adopting a child.

16. Jane Doe 5's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 5 was pregnant and due to deliver a baby in March 2019.

17. A.P. and C.P are residents of South Carolina. In 2018, they were interested in adopting a child.

18. H.C. and M.C. are residents of Kentucky. In 2018, they were interested in adopting a child.

19. Jane Doe 6 is a resident of Michigan. In 2018, she was pregnant and due to deliver a baby in March 2019. In October 2018, she met with LEE but decided that she did not want to place her child into adoption.

20. H.B. and J.B.2 are residents of Alabama. In 2018, they were interested in adopting a child.

21. Jane Doe 7's identity is unknown. In 2018, LEE told potential adoptive parents that Jane Doe 7 was pregnant and due to deliver a baby in March 2019.

22. K.T. and A.T. are residents of Michigan. In 2018, they were interested in adopting a child.

23. E.J. is a resident of Wisconsin. In 2018, she was interested in adopting a child.

24. Jane Doe 8 is a resident of Michigan.

25. H.B.2 and C.B. are residents of Virginia. In 2018, they were interested in adopting a child.

26. Jane Doe 9 is a resident of Michigan. In June 2018, LEE told potential adoptive parents that Jane Doe 9 was pregnant and interested in placing her child into adoption. Jane Doe 9 was not pregnant in June 2018.

27. A.R. and J.R. are residents of Illinois. In 2018, they were interested in adopting a child.

SCHEME TO DEFRAUD

28. Beginning in approximately 2014 and continuing through approximately November 2018, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE knowingly executed and attempted to execute a scheme to defraud people seeking to adopt children, and to obtain money by means of materially false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

29. Under Michigan law, LEE and LEE's companies were not licensed to facilitate adoptions, place children, or "match" birth mothers with adoptive parents. Yet from 2014 to 2018, LEE repeatedly paired birth mothers with adoptive parents. LEE represented herself to adoptive parents as a legitimate adoption agency.

30. LEE told birth mothers and adoptive families that she was a licensed social worker, and that she would provide birth mothers with counseling and other services during pregnancy and after adoption. LEE does not have a license to practice social work.

31. It was part of the scheme that LEE matched birth mothers and adoptive parents by first sending a description of a pregnant woman to her network of adoption connections. The description, or "opportunity," would include the pregnant woman's first name and information about her pregnancy. Interested adoptive families responded to LEE, and sent her information about themselves. LEE then

informed a set of adoptive parents that the birth mother had selected them, and requested payment.

32. On several occasions, LEE matched more than one set of adoptive parents to a birth mother. In these “double-matches,” LEE collected payment from both sets of adoptive parents.

33. Other times, LEE matched adoptive parents with birth mothers that did not exist, were not pregnant, or had not decided to place their child into adoption. For these “fabricated matches,” LEE collected payment from prospective adoptive parents.

34. On several occasions, in order to further her scheme to defraud, LEE had women, including WIGGINS, impersonate birth mothers on the telephone with prospective adoptive parents.

35. It was part of the scheme that many of the adoptions arranged by LEE failed, either because the pregnancy was not real, the pregnancy had been matched to more than one family, the birth mother was not interested in adoption, or the birth mother changed her mind about adoption. LEE gave false information to adoptive parents when explaining why an adoption had failed.

36. It was part of the scheme that when LEE informed adoptive parents that an adoption had failed, she encouraged them to keep working with her and she quickly presented them with new birth mother opportunities. LEE would offer to “roll over”

some of the funds that adoptive parents had paid for the failed adoption to a new match. In some instances, LEE requested and obtained additional payment for subsequent birth mother matches.

COUNTS ONE THROUGH THREE

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

37. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

38. On or about February 16, 2018, M.S. and J.S. received an Always Hope adoption opportunity for Jane Doe 1. The opportunity included photographs of Jane Doe 1 and her children, and said that she was pregnant with a girl, and that her estimated due date was July 3, 2018. M.S. and J.S. presented their adoptive parent profile to LEE for consideration in the adoption of Jane Doe 1's baby.

39. On or about February 17, 2018, LEE called M.S. and told her that Jane Doe 1 had chosen M.S. and J.S. to adopt her child. On or about February 19, 2018, M.S. and J.S. paid LEE \$19,000 by giving LEE their credit card information over the phone.

40. On or about February 17, 2018, M.E. and J.E. received an Always Hope adoption opportunity for Jane Doe 1. The opportunity was the same one described

above in paragraph 38. M.E. and J.E. presented their adoptive parent profile to LEE for consideration in the adoption of Jane Doe 1's baby.

41. On or about February 21, 2018, LEE called M.E. and told her that Jane Doe 1 had chosen M.E. and J.E. to adopt her child. On or about February 21, 2018 and February 23, 2018, M.E. and J.E. paid LEE \$20,000 by giving her their credit card information over the phone.

42. From March to June 2018, LEE communicated with M.S./J.S. and M.E./J.E. through text messages and phone conversations. LEE gave both sets of prospective adoptive parents occasional updates about Jane Doe 1 and her pregnancy.

43. On or about July 1, 2018, LEE called M.E. and J.E. and told them that their adoption had failed because Jane Doe 1 had delivered her baby without telling LEE, and that Jane Doe 1 had decided not to place her child into adoption. LEE presented M.E. and J.E. with other adoption opportunities, and told them that the money they had paid would "roll over" to another adoption.

44. On or about July 1, 2018, M.S. and J.S. left Colorado and began traveling to Michigan. They arrived in Michigan on or about July 3, 2018. On or about July 7, 2018, LEE told M.S. and J.S. that the adoption had failed, and that Jane Doe 1 had decided not to place her baby into adoption. LEE told M.S. and J.S. about another birth mother opportunity.

45. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
1	2/23/18	Text from LEE to M.S. about Jane Doe 1	Sent from MI (586-839-XXXX) to CO (XXX-X8X-41XX)	D-1 LEE
2	2/23/18	Text from LEE to M.E. about Jane Doe 1	Sent from MI (586-839-XXXX) to MN (XXX-X2X-68XX)	D-1 LEE
3	5/10/2018	Video sent via text message from LEE to M.S. showing a pregnant woman's stomach	Sent from MI (586-839-XXXX) to CO (XXX-X8X-41XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNTS FOUR AND FIVE

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

46. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

47. On or about February 25, 2018, E.T. received an Always Hope adoption opportunity for a birth mother identified as “RaShaunda.” The opportunity included a photograph of RaShaunda, and said that she was pregnant with a boy, and that her estimated due date was June 30, 2018. E.T. communicated to LEE that she was interested in the RaShaunda opportunity.

48. On or about February 25, 2018, LEE called E.T. and told her that RaShaunda had chosen E.T. and C.T. to adopt her child. On or about February 26, 2018, E.T. paid LEE \$15,000 by providing her with credit card numbers over the phone.

49. From February to June 2018, LEE communicated with E.T. through text messages and phone conversations. LEE gave E.T. occasional updates about RaShaunda and her pregnancy.

50. On or about June 12, 2018, LEE called E.T. and told her that RaShaunda had been shot and killed and that her baby had died on the way to the hospital.

51. In truth and fact, birth mother RaShaunda did not exist and she was not shot and killed. LEE fabricated RaShaunda and her pregnancy.

52. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
4	4/26/18	Ultrasound image sent via text from LEE to E.T.	Sent from MI (586-839-XXXX) to GA (XXX-X6X-56XX)	D-1 LEE
5	6/2/18	Text from LEE to E.T. about RaShaunda	Sent from MI (586-839-XXXX) to GA (XXX-X6X-56XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNTS SIX THROUGH NINE

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

53. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

54. On or about April 26, 2018, L.C. received an Always Hope adoption opportunity for ENHELICA WIGGINS. The opportunity included WIGGINS's first name, and said that the sex of the baby was unknown because WIGGINS was only six weeks pregnant. The opportunity stated that WIGGINS's estimated due date was December 17, 2018. L.C. told LEE that she and J.C. were interested in adopting WIGGINS's baby.

55. On or about April 27, 2018, LEE sent L.C. a text message telling her that WIGGINS had chosen L.C. and J.C. to adopt her child. On or about April 27, 2018,

May 1, 2018, and May 5, 2018, J.C. and L.C. paid LEE a total of \$33,000 by providing her with credit card numbers over the phone.

56. In April 2018, M.J. and N.J. saw the Always Hope adoption opportunity for WIGGINS described above in paragraph 47. On or about April 27, 2018, M.J. spoke to LEE on the phone, and told her that she and N.J. were interested in adopting WIGGINS's baby.

57. On or about April 29, 2018, LEE sent M.J. a text message telling her that WIGGINS had chosen M.J. and N.J. to adopt her child. On or about April 30, 2018, N.J. paid LEE \$25,000 by providing her with credit card numbers over the phone.

58. From April to November 2018, LEE communicated with L.C./J.C. and M.J./N.J. through text messages and phone conversations. LEE gave both sets of prospective adoptive parents occasional updates about WIGGINS and her pregnancy.

59. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
6	4/27/2018	Text from LEE to L.C. about WIGGINS	Sent from MI (586-839-XXXX) to MI (XXX-X2X-36XX)	D-1 LEE
7	4/29/2018	Text from LEE to M.J. about WIGGINS	Sent from MI (586-839-XXXX) to MO (XXX-X4X-63XX)	D-1 LEE
8	6/23/2018	Image sent via text message from LEE to L.C. depicting WIGGINS	Sent from MI (586-839-XXXX) to MI (XXX-X2X-36XX)	D-1 LEE
9	6/23/2018	Image sent via text message from LEE to M.J. depicting WIGGINS	Sent from MI (586-839-XXXX) to MO (XXX-X4X-63XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNTS TEN AND ELEVEN

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

60. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

61. On or about June 15, 2018, C.L. received an Always Hope adoption opportunity for Jane Doe 3. The opportunity stated that the baby's sex was unknown, and that Jane Doe 3's estimated due date was November 8, 2018. A photograph of

Jane Doe 3 was attached to the opportunity. C.L. communicated to LEE that she and J.L. were interested in adopting Jane Doe 3's child.

62. In June 2018, S.G. and B.G. received an Always Hope adoption opportunity for Jane Doe 3. The opportunity was the same one described above in paragraph 61. S.G. communicated to LEE that she and B.G. were interested in adopting Jane Doe 3's child.

63. On or about June 16, 2018, LEE told S.G. that Jane Doe 3 had chosen S.G. and B.G. to adopt her child. On or about June 16, 2018, B.G. paid LEE \$12,000 by providing her with credit card numbers over the phone.

64. On or about June 17, 2018, LEE told J.L. that Jane Doe 3 had chosen J.L. and C.L. to adopt her child. On or about June 18, 2018, J.L. paid LEE \$18,000 by providing her with credit card numbers over the phone.

65. In truth and fact, Jane Doe 3 was not pregnant. She did not tell LEE that she was pregnant or otherwise communicate with LEE about adoption in 2018.

66. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
10	6/16/2018	Text from LEE to S.G. about Jane Doe 3	Sent from MI (586-839-XXXX) to OH (XXX-X4X-47XX)	D-1 LEE
11	6/17/2018	Text from LEE to J.L. about Jane Doe 3	Sent from MI (586-839-XXXX) to SC (XXX-X1X-35XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNTS TWELVE AND THIRTEEN

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

67. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

68. On or about July 3, 2018, S.M. received an Always Hope adoption opportunity for Jane Doe 4. The opportunity stated that Jane Doe 4 was expecting a baby boy in December 2018. S.M. communicated to LEE that she and P.M. were interested in adopting Jane Doe 4's child.

69. On or about July 4, 2018, LEE told S.M. that Jane Doe 4 had chosen S.M. and P.M. to adopt her baby. On or about July 4, 2018, S.M. and P.M. paid LEE \$17,000 by providing her with credit card numbers over the phone.

70. In the beginning of July 2018, LEE told E.L. about birth mother Jane Doe 4. On or about July 5, 2018, J.L.2 and E.L. communicated to LEE that they were interested in adopting Jane Doe 4's baby.

71. On or about July 7, 2018, LEE sent a text message to E.L. telling her that Jane Doe 4 had chosen her and J.L.2 to adopt her baby. On or about July 22, 2018, E.L. and J.L.2 paid LEE \$17,000 by providing her with credit card numbers over the phone.

72. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
12	7/23/2018	Text from LEE to S.M. about Jane Doe 4	Sent from MI (586-839-XXXX) to OH (XXX-X4X-35XX)	D-1 LEE
13	7/25/2018	Text from LEE to E.L.. about Jane Doe 4	Sent from MI (586-839-XXXX) to IN (XXX-X1X-74XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNT FOURTEEN

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

73. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

74. On or about September 21, 2018, M.B. and J.B. learned about an Always Hope adoption opportunity for Jane Doe 5. The information that they received said that Jane Doe 5 had an estimated due date of March 6, 2019, and that Jane Doe 5 had come to Always Hope “as a referral from another expectant mother.” M.B. and J.B. expressed their interest in adopting Jane Doe 5’s baby.

75. On or about September 29, 2018, LEE told J.B. that Jane Doe 5 had chosen J.B. and M.B. to adopt her baby. On or about September 29, 2018, J.B. and M.B. paid LEE \$15,000 by providing her with their credit card numbers over the phone.

76. In truth and fact, prior to accepting payment from M.B. and J.B., LEE had never met with Jane Doe 5, had not confirmed that she was pregnant, and had not determined that Jane Doe 5 wanted to work with LEE to place her child into adoption.

77. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs,

signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
14	10/3/2018	Text from LEE to J.B. about Jane Doe 5	Sent from MI (586-839-XXXX) to KY (XXX-X2X-44XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNT FIFTEEN

Wire Fraud
18 U.S.C. §§ 1343, 2

D-1 TARA LYNN LEE
D-2 ENHELICA NIEVES WIGGINS

78. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

79. In October 2018, LEE and WIGGINS met with Jane Doe 6. During this meeting, LEE discussed adoption with Jane Doe 6, who was pregnant and due to deliver a baby in March 2019. LEE tried to convince Jane Doe 6 to place her baby into adoption. Jane Doe 6 told LEE that she was not interested in adoption.

80. On or about October 1, 2018, A.P. received an Always Hope adoption opportunity for Jane Doe 6. The opportunity said that Jane Doe 6 had an estimated due date of March 1, 2019. The opportunity also stated that Jane Doe 6 “came to us as a referral from another expectant mother.” A.P. also received a photograph of

Jane Doe 6. A.P. told LEE that she and C.P. wanted to be considered for Jane Doe 6's adoption.

81. On or about October 2, 2018, LEE and WIGGINS had a three-way phone call with A.P. During the phone call, WIGGINS pretended to be Jane Doe 6.

82. On or about October 2, 2018, LEE told A.P. that Jane Doe 6 had chosen A.P. and C.P. to adopt her baby. On or about October 3, 2018, A.P. and C.P. paid LEE \$15,000 by providing her with their credit card numbers over the phone.

83. On or about October 4, 2018, A.P. found a Facebook profile for Jane Doe 6. From the profile, A.P. learned that Jane Doe 6 did not plan to place her child into adoption. A.P. contacted LEE and withdrew from the match with Jane Doe 6.

84. In truth and in fact, Jane Doe 6 was pregnant in 2018. Jane Doe 6 did not tell LEE that she wanted to place her child into adoption. Jane Doe 6 did not select A.P./C.P. as adoptive parents for her child.

85. On or about the dates set forth below, in the Eastern District of Michigan, TARA LYNN LEE and ENHELICA NIEVES WIGGINS, aided and abetted by one another, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
15	10/2/2018	Phone conversation between LEE, WIGGINS, and A.P.	From MI (586-839-XXXX) to SC (XXX-X9X-58XX)	D-1 LEE D-2 WIGGINS

All in violation of Title 18, United States Code, Sections 1343, 2.

COUNT SIXTEEN

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

86. The allegations of paragraphs 1 through 36 and 79 through 85 are realleged and incorporated by reference.

87. On or about October 31, 2018, H.C. received an Always Hope adoption opportunity for Jane Doe 6. H.C. told LEE that she and M.C. were interested in adopting Jane Doe 6's baby.

88. On or about October 31, 2018, LEE told H.C. that Jane Doe 6 had chosen H.C. and M.C. to adopt her baby. On or about October 31, 2018 and November 5, 2018, H.C. and M.C. paid LEE a total of \$15,000.

89. In truth and in fact, Jane Doe 6 did not select H.C./M.C. as adoptive parents for her child.

90. On or about the dates set forth below, in the Eastern District of Michigan, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
16	11/1/2018	Ultrasound image sent via text message from LEE to H.C.	From MI (586-839-XXXX) to KY (XXX-X1X-29XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNT SEVENTEEN

Aggravated Identity Theft
18 U.S.C. § 1028A(a)(1)

D-1 TARA LYNN LEE

Between on or about October 1, 2018 to on or about November 14, 2018, in the Eastern District of Michigan and elsewhere, the defendant, TARA LYNN LEE, did knowingly transfer and use, without lawful authority, a means of identification of another person, to wit: Jane Doe 6, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: wire fraud in violation of 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person, in violation of 18 U.S.C. § 1028A(a)(1).

COUNTS EIGHTEEN AND NINETEEN

Wire Fraud
18 U.S.C. §§ 1343, 2

D-1 TARA LYNN LEE

D-2 ENHELICA NIEVES WIGGINS

91. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

92. In October 2018, WIGGINS told LEE that Jane Doe 7 was pregnant and wanted to place her child into adoption.

93. In October 2018, H.B. and J.B.2 received an Always Hope adoption opportunity for Jane Doe 7. The opportunity said that Jane Doe 7 had an estimated due date of March 17, 2019, and that Jane Doe 7 “came to us as a referral from another expectant mother.” H.B. and J.B.2 told LEE that they wanted to be considered for Jane Doe 7’s adoption.

94. On or about October 21, 2018, LEE and WIGGINS had a three-way phone call with H.B. During the phone call, WIGGINS pretended to be Jane Doe 7.

95. On or about October 21, 2018, LEE told H.B. that Jane Doe 7 had chosen H.B. and J.B.2 to adopt her baby. On or about October 21, 23, 24, and 25, 2018, H.B. and J.B.2 paid LEE \$13,000 by providing her with their credit card numbers over the phone.

96. On or about November 2, 2018, LEE and WIGGINS had a three-way phone call with H.B. During the phone call, WIGGINS pretended to be Jane Doe 7.

97. In truth and fact, prior to accepting payment from H.B. and J.B.2, LEE never met with Jane Doe 7, did not confirm that she was pregnant, and did not determine that Jane Doe 7 wanted to work with LEE to place her child into adoption.

98. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE and ENHELICA NIEVES WIGGINS, aided and abetted by one another, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
18	10/21/2018	Phone conversation between LEE, WIGGINS, and H.B.	From MI (586-839-XXXX) to AL (XXX-X7X-25XX)	D-1 LEE D-2 WIGGINS
19	11/2/2018	Phone conversation between LEE, WIGGINS, and H.B.	From MI (586-839-XXXX) to AL (XXX- X7X-25XX)	D-1 LEE D-2 WIGGINS

All in violation of Title 18, United States Code, Sections 1343, 2.

COUNTS TWENTY AND TWENTY-ONE

Wire Fraud
18 U.S.C. §§ 1343, 2

D-1 TARA LYNN LEE

99. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

100. On or about April 20, 2018, LEE sent information about birth mother Jane Doe 8 to prospective adoptive parent E.J. LEE sent a photograph of Jane Doe 8 to E.J. via Facebook messenger. E.J. told LEE that she was interested in adopting Jane Doe 8's baby. LEE requested payment for E.J.'s match to Jane Doe 8.

101. On or about April 23, 2018, E.J.'s relative paid LEE \$13,300 by providing LEE with credit card numbers.

102. In or about May 2018, LEE sent information about Jane Doe 8 to prospective adoptive parents K.T. and A.T.; K.T. and A.T. told LEE that they were interested in adopting Jane Doe 8's baby. LEE requested and received payment from K.T. and A.T. for their match with Jane Doe 8. On or about May 13, 2018, K.T. paid LEE \$15,000.

103. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs,

signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
20	4/20/18	Photograph of Jane Doe 8 sent by LEE to E.J.	From MI to WI, via Facebook	D-1 LEE
21	5/12/2018	Screenshots of Facebook messages between LEE and Jane Doe 8 sent by LEE to K.T.	From MI (586-839-XXXX) to MI (XXX- X7X-27XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNT TWENTY-TWO

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

104. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

105. In or about June 2018, LEE sent information about birth mother Jane Doe 9 to her network of adoption contacts. The opportunity said that Jane Doe 9 had an estimated due date of November 28, 2018, and that Jane Doe 9 and her boyfriend

were “working very hard on their sobriety and just got their son back from after he was in CPS care.”

106. On or about June 8, 2018, LEE informed prospective adoptive parents H.B.2 and C.B. that Jane Doe 9 had chosen them to adopt her baby. LEE requested and received payment from H.B.2 and C.B. On or about June 9, 2018, H.B. 2 and C.B. paid LEE \$19,000 by providing her with credit card numbers over the phone.

107. In truth and in fact, Jane Doe 9 was not pregnant in June 2018, and she did not tell LEE that she was pregnant or select H.B.2 and C.B. as adoptive parents.

108. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
22	7/13/2018	Photograph of Jane Doe 9 sent by LEE to H.B.2	From MI (586-839-XXXX) to VA (XXX-X7X-71XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

COUNTS TWENTY-THREE AND TWENTY-FOUR

Wire Fraud
18 U.S.C. § 1343

D-1 TARA LYNN LEE

109. The allegations of paragraphs 1 through 36 are realleged and incorporated by reference.

110. On or about August 13, 2018, LEE sent information about birth mother “Devein” to prospective adoptive parents A.R. and J.R. On or about August 14, 2018, LEE told A.R. and J.R. that “Devein” had chosen them to adopt her baby.

111. On or about August 15, 2018, A.R. and J.R. paid LEE \$15,000 for the match with “Devein” by providing LEE with their credit card information over the phone.

112. On or about August 26, 2018, LEE arranged a three-way call between herself, A.R., and “Devein.” The phone call lasted for approximately seven minutes. In truth and in fact, LEE had another woman, who was not pregnant, impersonate “Devein” during the phone call with A.R.

113. On or about October 4, 2018, LEE sent A.R. screenshots of a conversation between LEE and “Devein” about her pregnancy, and about A.R.’s request to see an ultrasound photograph. In truth and in fact, the text conversation was between LEE’s personal cellular phone and another cellular phone belonging to LEE.

114. On or about October 28, 2018, LEE sent A.R. a photograph depicting a pregnant woman from the neck down. The photograph was accompanied with the

text: “I had d over for dinner tonight,” and “There’s your baby.” In truth and in fact, the photograph that LEE sent to A.R. depicted another pregnant woman that LEE had matched to another couple, and was not “Devein.”

115. On or about the dates set forth below, in the Eastern District of Michigan and elsewhere, TARA LYNN LEE, for the purpose of executing the scheme set forth above, did knowingly cause interstate wire transmission of the writings, signs, signals, and sounds described below for each count, each count constituting a separate count of the indictment:

COUNT	APPROX. DATE	DESCRIPTION	TRANSACTION DETAILS	DEFENDANT
23	10/04/2018	Screenshot of conversation between LEE and “Devein” sent to A.R.	From MI (586-839-XXXX) to IL (XXX-X0X-55XX)	D-1 LEE
24	10/28/2018	Photograph sent by LEE to A.R.	From MI (586-839-XXXX) to IL (XXX-X0X-55XX)	D-1 LEE

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)
Criminal Forfeiture

The allegations contained in Counts One through Sixteen and Eighteen through Twenty-four of this First Superseding Indictment are realleged and

incorporated by reference to allege forfeiture under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, set forth in Counts One through Sixteen and Eighteen through Twenty-four, the convicted defendant shall forfeit to the United States of America, under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to the real property located at 30370 Redford, New Haven, MI 48048 (Parcel ID No.: 06-28-301-032) and/or any proceeds derived, directly or indirectly, from the identified real property.

The forfeiture in this case may also include entry of a forfeiture money judgment in an amount up to the value of the criminal proceeds personally obtained by each defendant for the violations of conviction and any violations that are part of the same fraudulent scheme.

If, by any act or omission of the defendant, the proceeds of the offense(s) cannot be located upon the exercise of due diligence, have been transferred, sold to, or deposited with a third party, have been placed beyond the jurisdiction of the court, have been substantially diminished in value, or have been commingled with other

property which cannot be divided without difficulty, the United States of America shall seek to forfeit substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

s/ John K. Neal
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s/ Sara D. Woodward
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ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 19-cr-20128
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>SPW</u>

Case Title: USA v. Tara Lynn Lee

FILED USDC - CLRK DET
2019 JUL 18 PM4:34

County where offense occurred : Macomb

Check One: **Felony** **Misdemeanor** **Petty**

- Indictment/ Information --- no prior complaint.
- Indictment/ Information --- based upon prior complaint [Case number: 19-mj-30248]
- Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

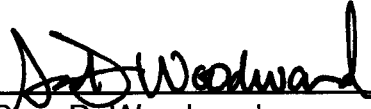
Superseding to Case No: 19-cr-20128 Judge: Bernard A. Friedman

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
D-2 ENHELICA NIEVES WIGGINS	18 U.S.C. §§ 1343, 2	19-mj-30248

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

July 18, 2019
Date



Sara D. Woodward
Assistant United States Attorney
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Attorney Bar #: 73784

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.