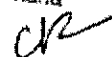


CHAD C. SPRAKER
Assistant U.S. Attorney
U.S. Attorney's Office
JOHN T. MULCAHY
Trial Attorney
U.S. Department of Justice, Tax Division
901 Front Street, Suite 1100
Helena, MT 59626
Phone: (406) 457-5120
FAX: (406) 457-5130
Emails: chad.spraker@usdoj.gov
john.t.mulcahy@usdoj.gov

FILED

MAY 23 2016

Clerk, U S District Court
District Of Montana
Billings



**ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEVEN DON PJEVACH,

Defendant.

CR 16- 24 -M- DUC

INDICTMENT

**CORRUPT INTERFERENCE WITH THE
ADMINISTRATION OF THE INTERNAL
REVENUE LAWS**

Title 26 U.S.C. § 7212(a)

(Count I)

**(Penalty: Three years imprisonment,
\$250,000 fine, and three years supervised
release)**

THEFT OF GOVERNMENT MONEY

Title 18 U.S.C. § 641

(Counts II through XI)

**(Penalty: Ten years imprisonment,
\$250,000 fine, and three years supervised
release)**

	AGGRAVATED IDENTITY THEFT Title 18 U.S.C. § 1028A (Counts XII through XVII) (Penalty: Mandatory two years imprisonment, \$250,000 fine, and three years supervised release)
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THE GRAND JURY CHARGES:

At times relevant to this Indictment:

Introductory Allegations

1. Defendant STEVEN DON PJEVACH was a resident of Montana and Nevada.
2. STEVEN DON PJEVACH solicited and obtained individuals' names and social security numbers through advertisements on the Craigslist website.
3. STEVEN DON PJEVACH used the names and social security numbers of other individuals to file false and fraudulent tax returns requesting refunds from the Internal Revenue Service, an agency of the United States Department of the Treasury.
4. STEVEN DON PJEVACH kept or caused to be kept detailed notes regarding the filing of false and fraudulent tax returns, including, but not limited to, the following information: the name and social security number of the identity used, the date of filing, the refund amount and the date of the refund deposit into the bank.

COUNT I

(26 U.S.C. § 7212(a) – Corrupt Interference with
the Administration of the Internal Revenue Laws)

5. Paragraphs 1-4 are re-alleged and incorporated by reference as though fully set forth herein.

6. From in or about March 2010 through at least September 2014, in the District of Montana and elsewhere, Defendant STEVEN DON PJEVACH, did corruptly endeavor to obstruct and impede the administration of the internal revenue laws, by committing acts including, but not limited to, the following:

(a) Posting and causing to be posted false help-wanted advertisements on Craigslist to obtain individuals' names and social security numbers.

(b) Using the names and social security numbers of those individuals solicited through Craigslist to file false and fraudulent tax returns.

(c) Opening and causing to be opened bank accounts in other individuals' names for receiving fraudulently obtained tax refunds.

(d) Using and causing to be used bank accounts in other individuals' names to receive fraudulently obtained tax refunds.

- (e) Using his own bank account at Glacier Bank to receive fraudulently obtained tax refunds.
- (f) Providing false information to those individuals whose bank accounts he used regarding the reason that he was using their bank accounts.
- (g) Advising one of these individuals to disregard or not pay attention to correspondence from the bank regarding the bank account being used for the fraudulently obtained tax refunds.
- (h) Debiting and causing to be debited money from a bank account that was used to receive fraudulently obtained tax refunds.
- (i) Creating and causing to be created false and fraudulent W-2s.

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

COUNTS II - XI
(18 U.S.C. § 641 – Theft of Government Money)

7. Paragraphs 1-4 are re-alleged and incorporated by reference as though fully set forth herein.

8. On or about each of the dates listed below, in the District of Montana and elsewhere, Defendant STEVEN DON PJEVACH did knowingly steal, purloin, and convert to his own use and the use of another money of the United States Department of the Treasury, namely federal income tax refunds which, in the aggregate exceed the sum of \$1,000, using the names and social security numbers

of those individuals listed by their initials below, which funds Defendant was not entitled to receive:

Count	Date of Deposit	Individual	Amount	Bank	Account Number
II	6/24/2011	T.H.	\$949	Park Side Federal Credit Union	XXX3076
III	9/2/2011	W.C.	\$948	Park Side Federal Credit Union	XXX3076
IV	9/9/2011	A.D.	\$2389	Park Side Federal Credit Union	XXX3076
V	10/14/2011	K.M.	\$1487	Park Side Federal Credit Union	XXX3076
VI	10/14/2011	A.M.	\$1048	Park Side Federal Credit Union	XXX3076
VII	10/21/2011	V.B.	\$1773	Park Side Federal Credit Union	XXX3076
VIII	2/29/2012	W.C.	\$819	Glacier Bank	XXXXXXXXX5776
IX	3/7/2012	H.N-A.	\$992	Glacier Bank	XXXXXXXXX5776
X	3/7/2012	A.M.	\$1008	Glacier Bank	XXXXXXXXX5776
XI	3/7/2012	C.H.	\$1298	Glacier Bank	XXXXXXXXX5776

All in violation of Title 18, United States Code, Section 641.

COUNTS XII - XVII

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

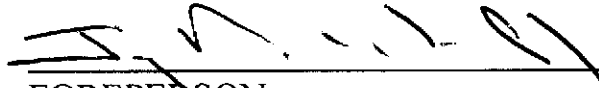
9. Paragraphs 1-4 are re-alleged and incorporated by reference as though fully set forth herein.

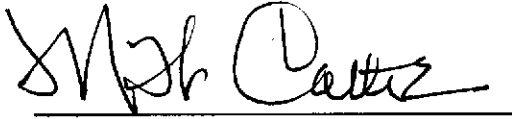
10. On or about each of the dates listed below, in the District of Montana and elsewhere, Defendant STEVEN DON PJEVACH did knowingly possess, transfer, and use without lawful authority the means of identification of another person, knowing that the means of identification belonged to another person, during and in relation to an offense in this Indictment identified as the related count below; that is, he knowingly transferred, possessed, and used the names and social security numbers of actual people, listed by their initials below, during and in relation to the offense of theft of government money in violation of 18 U.S.C. § 641:

Count	Date of Offense	Related Count	Individual
XII	8/27/2011	IV	A.D.
XIII	10/1/2011	V	K.M.
XIV	10/3/2011	VI	A.M.
XV	10/11/2011	VII	V.B.
XVI	2/25/2012	X	A.M.
XVII	2/28/2012	XI	C.H.

All in violation of Title 18, United States Code, Section 1028A(a)(1) & (c)(1).

A TRUE BILL.


FOREPERSON



MICHAEL W. COTTER
United States Attorney
Attorney for Plaintiff



JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney
Attorney for Plaintiff

Crim. Summons _____

Warrant: _____

Rail: _____