

**FILED**

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

APR 17 2013

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 BRIDGETTE RIVERS, )  
 )  
 )  
 )  
 Defendant. )

Case No. 2:13-cr- *63-MHT*  
[18 U.S.C. § 286;  
18 U.S.C. § 641;  
18 U.S.C. § 2;  
18 U.S.C. § 981(a)(1)(C)]

**CLERK  
U.S. DISTRICT COURT  
MIDDLE DIST. OF ALA.**

**INDICTMENT**

**The Grand Jury charges that:**

**INTRODUCTION**

At all times relevant to this Indictment:

1. Defendant BRIDGETTE RIVERS resided in Montgomery County, Alabama, within the Middle District of Alabama.
2. A “means of identification” was any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a name, Social Security number, and date of birth.
3. The Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury responsible for enforcing and administering the federal tax laws of the United States, and collecting taxes owed to the United States.

**COUNT ONE**

(Conspiracy to Defraud the Government with Respect to Claims)

1. The factual allegations contained in Paragraphs 1 through 3 of the Introduction Section of this Indictment are realleged and incorporated herein as if copied verbatim.

2. From in or about June 2011 and continuing until in or about April 2012, within the Middle District of Alabama and elsewhere, Defendant BRIDGETTE RIVERS, along with Veronica Temple, Yolanda Moses, Barbara Murry, and others, both known and unknown to the grand jury, unlawfully and knowingly agreed, combined, and conspired with others and each other to defraud the United States by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims.

#### **MANNER AND MEANS**

3. Defendant BRIDGETTE RIVERS, along with Veronica Temple, Yolanda Moses, Barbara Murry, and others, both known and unknown to the grand jury, would and did agree to file and cause others to file false federal income tax returns in the names of third parties without the third parties' knowledge or consent.

4. Defendant BRIDGETTE RIVERS would and did obtain the means of identification of individuals, including their names, dates of birth, and Social Security numbers.

5. Defendant BRIDGETTE RIVERS would and did provide these means of identification to Veronica Temple, Yolanda Moses, and Barbara Murry.

6. Veronica Temple and Yolanda Moses would and did use these means of identification, as well as other means of identification, to prepare and file false federal income tax returns and directed the tax refunds to be deposited into bank accounts controlled by the conspirators.

7. Veronica Temple, Yolanda Moses, and Barbara Murry would and did pay Defendant BRIDGETTE RIVERS for providing means of identification.

8. Defendant BRIDGETTE RIVERS would and did recruit “L.H.,” an individual known to the grand jury, to permit her bank account to be used for receiving tax refunds.

9. Defendant BRIDGETTE RIVERS would and did direct L.H. to make cash withdrawals of the tax refunds from her bank account and to provide Defendant BRIDGETTE RIVERS with the cash.

**ACTS IN FURTHERANCE OF THE CONSPIRACY**

10. To accomplish the objectives of the conspiracy, in the Middle District of Alabama and elsewhere, and in furtherance thereof, Defendant BRIDGETTE RIVERS, along with Veronica Temple, Yolanda Moses, Barbara Murry, and others, both known and unknown to the grand jury, committed, among other acts, the following acts in furtherance of the conspiracy:

11. On several dates between June and August 2011, the precise dates being unknown to the grand jury, Defendant BRIDGETTE RIVERS provided means of identification to Veronica Temple, Yolanda Moses, and Barbara Murry.

12. On several dates in or after June 2011, the precise dates being unknown to the grand jury, Veronica Temple, Yolanda Moses, and Barbara Murry paid Defendant BRIDGETTE RIVERS for providing the means of identification.

13. On or about the date listed below, Veronica Temple and Yolanda Moses prepared and filed, and caused to be prepared and filed, a false federal income tax return in the name of the individual whose initials are listed below and claiming a tax refund for the amount listed below:

<b>Paragraph</b>	<b>Date of Filing</b>	<b>Individual</b>	<b>Refund Claimed</b>
13a	September 6, 2011	J.D.	\$950
13b	September 12, 2011	J.H.	\$1,400

<b>Paragraph</b>	<b>Date of Filing</b>	<b>Individual</b>	<b>Refund Claimed</b>
13c	October 14, 2011	A.H.	\$1,400
13d	October 14, 2011	D.L.	\$1,400

14. In or around September 2011, Defendant BRIDGETTE RIVERS obtained permission from L.H., an individual known to the grand jury, to have tax refunds sent to L.H.'s bank account, number xx6607, at MAX Federal Credit Union ("MAX").

15. On or about September 23, 2011, L.H.'s bank account at MAX, number xx6607, received a tax refund in the name of J.H. in the amount of \$1,400.

16. On or about October 7, 2011, L.H.'s bank account at MAX, number xx6607, received a tax refund in the name of J.D. in the amount of \$950.

17. On or about October 14, 2011, L.H.'s bank account at MAX, number xx6607, received a tax refund in the name of D.W. in the amount of \$1,400.

18. On or about October 27, 2011, L.H.'s bank account at MAX, number xx6607, received a tax refund in the name of A.H. in the amount of \$1,400.

19. On or about October 27, 2011, L.H.'s bank account at MAX, number xx6607, received a tax refund in the name of D.L. in the amount of \$1,400.

20. On or about October 27, 2011, L.H., acting at Defendant BRIDGETTE RIVERS' direction, withdrew cash from her bank account at MAX, number xx6607, by receiving cash back on various retail purchases.

All in violation of Title 18, United States Code, Section 286.

**COUNTS TWO THROUGH FIVE**  
(Theft of Public Money)

1. The factual allegations contained in Paragraphs 1 through 3 of the Introduction Section of this Indictment are realleged and incorporated herein as if copied verbatim.

2. On or about each date listed below, within the Middle District of Alabama, Defendant BRIDGETTE RIVERS did steal, purloin, and knowingly convert to her own use and the use of another, money of the United States, namely, funds administered by the Department of the Treasury in the form of a federal tax refund in the amount and name of the individual whose initials are listed below, which was deposited into MAX Federal Credit Union bank account number xx6607:

<b>Count</b>	<b>Date of Deposit</b>	<b>Individual</b>	<b>Amount</b>
<b>TWO</b>	September 23, 2011	J.H.	\$1,400
<b>THREE</b>	October 14, 2011	D.W.	\$1,400
<b>FOUR</b>	October 27, 2011	A.H.	\$1,400
<b>FIVE</b>	October 27, 2011	D.L.	\$1,400

All in violation of Title 18, United States Code, Sections 641 and 2.

**FORFEITURE ALLEGATION**

1. The allegations contained in Counts Two through Five of this Indictment are realleged and incorporated herein as if copied verbatim for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction for the offenses alleged in Counts Two through Five, Defendant BRIDGETTE RIVERS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all


property constituting or derived from the proceeds said Defendant obtained directly or indirectly as a result of said offenses.

3. 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,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), up to the value of the forfeitable property described above.

A TRUE BILL:

  
Foreperson

GEORGE L. BECK, JR.  
United States Attorney



Todd Brown  
Assistant United States Attorney



Jason Pogle  
Michael Boteler  
Trial Attorneys  
United States Department of Justice  
Tax Division