

FILED

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

MAY 1 2014

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

UNITED STATES OF AMERICA)	
)	CR. NO. 3:14-CR-00015-WKW
v.)	
)	
TRACY MITCHELL,)	[18 U.S.C. § 286;
LATASHA MITCHELL)	18 U.S.C. § 1343;
a/k/a "Tasha,")	18 U.S.C. § 1341;
DAMEISHA MITCHELL,)	18 U.S.C. § 1028A(a)(1), (c)(5);
a/k/a "Meisha,")	18 U.S.C. § 1029(a)(3);
TAMAICA HOSKINS,)	18 U.S.C. § 981(a)(1)(C)]
a/k/a "Tameka,")	
SHARONDRA JOHNSON,)	
CYNTHIA JOHNSON,)	
KESHIA LANIER,)	
a/k/a "Keshia Gary" and "Keshia Williams,")	
MEQUETTA SNELL-QUICK,)	<u>SUPERSEDING INDICTMENT</u>
TALARIUS PAIGE, and)	
PATRICE TAYLOR,)	
)	
Defendants.)	
_____)	

The Grand Jury charges that:

INTRODUCTION

At times relevant to this Superseding Indictment:

1. Defendant TRACY MITCHELL resided in Phenix City, Alabama, within the Middle District of Alabama. Defendant TRACY MITCHELL was employed at a hospital on Fort Benning, a United States Army post located in Columbus, Georgia. Through her employment, TRACY MITCHELL had access to the means of identification of individuals, including military personnel. Some of those military personnel were deployed to Afghanistan.

2. Defendants DAMEISHA MITCHELL, also known as “Meisha,” and LATASHA MITCHELL, also known as “Tasha,” resided in Phenix City, Alabama. Both defendants are TRACY MITCHELL’s daughters. TAMAICA HOSKINS, also known as “Tameka,” resided in Phenix City, Alabama, and dated TRACY MITCHELL’s son.

3. Defendant SHARONDRA JOHNSON and her mother, CYNTHIA JOHNSON, resided in Phenix City, Alabama. Both defendants worked at Wal-Mart in Columbus, Georgia.

4. Defendant KESHIA LANIER, also known as “Keshia Gary” and “Keshia Williams,” resided in Phenix City, Alabama, and in Columbus, Georgia. Defendant MEQUETTA SNELL-QUICK resided in Columbus, Georgia.

5. Defendant TALARIUS PAIGE resided in Phenix City, Alabama. Defendant PATRICE TAYLOR resided in Columbus, Georgia. Both TALARIUS PAIGE and PATRICE TAYLOR worked at a call center for Company A, located in Columbus, Georgia, and had access to the means of identification of individuals.

6. 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, or date of birth.

7. An “access device” was any card, plate, code, account number, electronic serial number, mobile identification number, personal identification number, or other telecommunications service, equipment, or instrument identifier, or other means of account access, that could be used alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that could be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument), such as a Social Security number.

8. The Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury responsible for enforcing and administering the tax laws of the United States, and collecting taxes owed to the United States.

COUNT ONE

(Conspiracy to Defraud the United States with Respect to Claims)

1. Beginning in or about January 2011, and continuing until in or about December 2013, within the Middle District of Alabama and elsewhere, defendants

**TRACY MITCHELL,
DAMEISHA MITCHELL,
LATASHA MITCHELL,
KESHIA LANIER,
TAMAICA HOSKINS,
SHARONDRA JOHNSON,
CYNTHIA JOHNSON,
MEQUETTA SNELL-QUICK,
TALARIUS PAIGE, and
PATRICE TAYLOR,**

as well as James Kiera, 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

2. Defendants TRACY MITCHELL, DAMEISHA MITCHELL, LATASHA MITCHELL, KESHIA LANIER, TAMAICA HOSKINS, SHARONDRA JOHNSON, CYNTHIA JOHNSON, MEQUETTA SNELL-QUICK, TALARIUS PAIGE, PATRICE TAYLOR, and others, both known and unknown to the grand jury, would and did agree to file and cause others to file false income tax returns.

3. TRACY MITCHELL, LATASHA MITCHELL, KESHIA LANIER, TALARIUS PAIGE, PATRICE TAYLOR, and others would and did obtain the means of identification of individuals, including their names and Social Security numbers.

4. TRACY MITCHELL, DAMEISHA MITCHELL, LATASHA MITCHELL, KESHIA LANIER, TAMAICA HOSKINS, SHARONDR A JOHNSON, CYNTHIA JOHNSON, MEQUETTA SNELL-QUICK, and others would and did transmit the means of identification of individuals through the use of text messages and email messages.

5. TRACY MITCHELL, KESHIA LANIER, TAMAICA HOSKINS, MEQUETTA SNELL-QUICK, and others would and did obtain Electronic Filing Identification Numbers (“EFIN”) in the names of several tax preparation businesses. On behalf of those tax preparation businesses, they would and did apply for bank products through New Capital Bank Atlas Financial and other financial institutions.

6. TRACY MITCHELL, LATASHA MITCHELL, KESHIA LANIER, MEQUETTA SNELL-QUICK and others would and did use these means of identification to prepare and electronically file false income tax returns and directed anticipated tax refunds to prepaid debit cards, to U.S. Treasury Checks, and to financial institutions which in turn issued the refunds via checks or prepaid debit cards. The Defendants and others would and did file over 7,000 2011 and 2012 fraudulent federal income tax returns that claimed over \$20 million in tax refunds.

7. TRACY MITCHELL, DAMEISHA MITCHELL, LATASHA MITCHELL, KESHIA LANIER, TAMAICA HOSKINS, SHARONDR A JOHNSON, CYNTHIA JOHNSON,

MEQUETTA SNELL-QUICK, and others would and did obtain federal income tax refund checks from the mail.

8. TRACY MITCHELL, DAMEISHA MITCHELL, LATASHA MITCHELL, KESHIA LANIER, TAMAICA HOSKINS, SHARONDR A JOHNSON, CYNTHIA JOHNSON, MEQUETTA SNELL-QUICK, James Kiera, and others caused federal income tax refund checks and refund checks issued through financial institutions to be cashed at several businesses located in Alabama, Georgia, and Kentucky.

9. The conspirators would and did take steps to conceal the existence of the conspiracy.

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, the Defendants and others, both known and unknown to the grand jury, committed, among others, the following acts:

11. On several dates on or after January 1, 2011, with the precise dates being unknown to the grand jury, KESHIA LANIER obtained from individuals, who are unknown to the grand jury and who had access to inmate's information from the Alabama Department of Corrections, the means of identification of individuals, including their names, dates of birth, and Social Security numbers.

12. On or about September 13, 2011, KESHIA LANIER obtained EFIN xxx515 in the name of S & D Tax Service.

13. On or about each date listed below, KESHIA LANIER prepared and filed, and caused to be prepared and filed, a false 2011 federal income tax return in the name of each of the following individuals listed by their initials and claiming a refund in the amount listed below:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
14.	D.Pa.	02/07/2011	\$4,075
15.	J.Ya.	02/21/2011	\$4,148
16.	M.Ya.	02/21/2011	\$4,674

17. On or about September 27, 2011, MEQUETTA SNELL-QUICK obtained EFIN xxx538 in the name of M & Q Tax Service.

18. On or after September 27, 2011, MEQUETTA SNELL-QUICK gave EFIN xxx538 in the name of M & Q Tax Service to KEISHA LANIER.

19. On or about July 9, 2012, KESHIA LANIER sent an email to MEQUETTA SNELL-QUICK listing account numbers and the personal information of H.La. and B.Wa.

20. On or about July 9, 2012, MEQUETTA SNELL-QUICK filed false 2011 federal income tax returns in the names of H.La. and B.Wa.

21. On or about August 12, 2012, MEQUETTA SNELL-QUICK filed a false 2011 federal income tax return in the name of Z.Lo., claiming a refund in the amount of \$919, and directed the tax refund to be mailed to MEQUETTA SNELL-QUICK's home.

22. On several dates between September 1, 2012 and January 8, 2013, TALARIUS PAIGE obtained the means of identification of individuals through her employment with Company A, including the following:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>
23.	J.Cu.	09/18/2012
24.	V.De.	09/18/2012
25.	D.Tu.	09/18/2012
26.	C.Da.	12/10/2012
27.	W.Fr.	12/21/2012

28. On several dates between September 1, 2012 and January 8, 2013, PATRICE TAYLOR obtained the means of identification of individuals through her employment with Company A, including the following:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>
29.	L.Do.	12/25/2012
30.	M.Sc.	12/27/2012
31.	T.Su.	12/27/2012
32.	P.Ho.	12/28/2012

33. Between in or about September 2012 and in or about January 2013, with the precise dates being unknown to the grand jury, TALARIUS PAIGE provided the names obtained by her and PATRICE TAYLOR to others.

34. On several dates on or after September 1, 2012, with the precise dates being unknown to the grand jury, TRACY MITCHELL, LATASHA MITCHELL, and others obtained from individuals, who are unknown to the grand jury and who had access to personal information from a database maintained by an Alabama state agency, the means of identification of individuals, including their names, dates of birth, and Social Security numbers.

35. On several dates on or after September 1, 2012, with the precise dates being unknown to the grand jury, TRACY MITCHELL obtained the means of identification of military personnel and their families from her employer at Fort Benning.

36. On a date unknown to the grand jury, TRACY MITCHELL obtained EFIN xxx577 in the name of Harris Financial for the purpose of filing false tax returns.

37. On a date unknown to the grand jury, KESHIA LANIER and others provided to TRACY MITCHELL EFIN xxx515 in the name of S & D Tax Service and EFIN xxx538 in the name of M & Q Tax Service for the purpose of filing false tax returns.

38. On or about September 5, 2012, D.C. obtained from the IRS EFIN xxx934 in the name of Datsher Tax Office.

39. On a date unknown to the grand jury, KESHIA LANIER received EFIN xxx934 in the name of Datsher Tax Office for the purpose of filing false tax returns.

40. On or about October 31, 2012, KESHIA LANIER rented a mailbox from Pak Mail Center in Newnan, Georgia.

41. On or about January 3, 2013, C.C. obtained EFIN xxx118 in the name of C.C.

42. On or about January 16, 2013, C.C. obtained EFIN xxx501 in the name of C.C.

43. C.C. provided the EFINs xxx118 and xxx501 to TAMAICA HOSKINS.

44. On a date unknown to the grand jury, TAMAICA HOSKINS provided EFINS xxx118 and xxx501 to TRACY MITCHELL.

45. On or about October 29, 2013, KESHIA LANIER applied on behalf of S & D Tax Office for bank products through New Capital Bank Atlas Financial.

46. On or after October 29, 2013, New Capital Bank Atlas Financial mailed blank New Capital Bank check stock to the mailbox rented by KESHIA LANIER in Newnan, Georgia.

47. On or about November 1, 2012, MEQUETTA SNELL-QUICK on behalf of M & Q Tax Service applied for bank products through New Capital Bank Atlas Financial.

48. On or after November 1, 2012, New Capital Bank Atlas Financial mailed blank New Capital Bank check stock to MEQUETTA SNELL-QUICK's home.

49. On or about November 5, 2012, KESHIA LANIER applied on behalf of Lanier Tax Service for bank products through New Capital Bank Atlas Financial.

50. TRACY MITCHELL prepared and filed, and caused to be prepared and filed, a false 2012 federal income tax return in the name of each of the following individuals whose initials are listed below, on or about the date and claiming a refund in the amount listed below:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
51.	E.To.	02/23/2013	\$2,652
52.	Je.Co.	02/23/2013	\$2,652
53.	G.Be.	03/05/2013	\$1,905
54.	A.Re.	03/05/2013	\$2,279
55.	C.Ro.	03/05/2013	\$2,321
56.	C.In.	03/05/2013	\$2,287
57.	J.Ca.	03/05/2013	\$2,312

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
58.	T.Br.	03/09/2013	\$1,890
59.	N.Su.	03/10/2013	\$2,295
60.	T.Co.	03/10/2013	\$2,209
61.	D.Tu.	03/11/2013	\$2,804
62.	J.Cu.	03/11/2013	\$2,966
63.	V.De.	03/11/2013	\$5,954
64.	M.Go.	03/16/2013	\$5,079
65.	M.Na.	03/16/2013	\$2,132
66.	C.Cu.	03/17/2013	\$2,214
67.	F.Sh.	07/10/2013	\$2,180
68.	L.Sm.	07/10/2013	\$2,291
69.	D.Pu.	08/13/2013	\$2,662
70.	K.Pe.	08/13/2013	\$2,584
71.	C.Po.	8/13/2013	\$2,603
72.	A.St.	11/12/2013	\$2,662

73. LATASHA MITCHELL prepared and filed, and caused to be prepared and filed, a false 2012 federal income tax return in the name of each of the following individuals whose initials are listed below, on or about the date and claiming a refund in the amount listed below:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
74.	B.Sc.	07/23/2013	\$3,225
75.	S.Sm.	07/23/2013	\$3,255
76.	M.Sp.	07/23/2013	\$3,390
77.	J.Sc.	07/23/2013	\$3,306
78.	K.St.	07/23/2013	\$3,306

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
79.	I.Sa.	07/23/2013	\$3,606
80.	R.Ca.	07/23/2013	\$3,225

81. KESHIA LANIER prepared and filed, and caused to be prepared and filed, a false 2012 federal income tax return in the name of each of the following individuals whose initials are listed below, on or about the date and claiming a refund in the amount listed below:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
82.	L.No.	02/02/2013	\$1,924
83.	A.Gr.	02/06/2013	\$2,306
84.	G. Em.	02/17/2013	\$1,586
85.	J.He.	05/01/2013	\$3,305
86.	W.He.	05/01/2013	\$3,133
87.	L.Do.	05/05/2013	\$3,724
88.	M.Sc.	05/05/2013	\$3,454
89.	T.Su.	05/05/2013	\$3,475

90. KESHIA LANIER and MEQUITTA SNELL-QUICK prepared and filed, and caused to be prepared and filed, a false 2012 federal income tax return in the name of each of the following individuals whose initials are listed below, on or about the date and claiming a refund in the amount listed below:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
91.	P.Fl.	02/08/2013	\$2,036

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
92.	J. An.	02/24/2013	\$1,447
93.	M.An.	02/24/2013	\$1,447
94.	K.Hu.	03/16/2013	\$1,000
95.	D.Hu.	03/16/2013	\$1,000
96.	A.Ho.	03/16/2013	\$1,000
97.	D.Ea.	04/07/2013	\$1,066
98.	A.Ra.	04/07/2013	\$1,102
99.	C.Ec.	04/07/2013	\$1,069
100.	P.Ho.	04/19/2013	\$2,250
101.	A.Me.	08/27/2013	\$2,041
102.	L.Ma.	08/27/2013	\$1,951
103.	M.Ma.	08/27/2013	\$1,906
104.	N.Ma.	08/27/2013	\$2,102

105. On or about the dates listed below, James Keira cashed the following federal income tax refund checks at a store in Kentucky:

<u>Paragraph</u>	<u>Initials</u>	<u>Date</u>	<u>Refund Claimed</u>
106.	L.Ma.	10/24/2013	\$1,951
107.	M.Ma.	10/25/2013	\$1,906
108.	N.Ma.	10/25/2013	\$2,102
109.	A.Me.	10/28/2013	\$2,041

110. On or about October 19, 2013, CYNTHIA JOHNSON caused to be cashed a federal income tax refund check in the name of J.So. and in the amount of \$2,489 and a federal income tax refund check in the name of A.Mi. and in the amount of \$2,558.

111. On or about October 19, 2013, SHARONDRA JOHNSON sent a text message to TRACY MITCHELL stating that: "Ok my mommy have the two that was 2489 and 2558 after everything was taking out one is 1663 and 1620 I Meisha was telling me to give the money to her cousin but I don't want to give your money to nobody but you are meisha." SHARONDRA JOHNSON sent a second text message stating that: "My mommy said she will meet you."

112. On or about October 19, 2013, CYNTHIA JOHNSON provided the proceeds from cashing federal income tax refund checks to TRACY MITCHELL.

113. On or about October 23, 2013, SHARONDRA JOHNSON provided the proceeds from cashing federal income tax refund checks to DAMEISHA MITCHELL and others.

114. On or about October 26, 2013, TRACY MITCHELL sent and received text messages from KESHIA LANIER regarding a federal tax refund check in the name of D.Wa. and in the amount of \$2,455.

115. On or about November 1, 2013, TRACY MITCHELL received text messages from TAMAICA HOSKINS regarding federal tax refund checks for S.Pe. in the amount of \$2,612, for J.Co. in the amount of \$2,729, for D.Ch. in the amount of \$3,335, and for K.Po. in the amount of \$3,135.

116. On or about November 1, 2013, TRACY MITCHELL forwarded text messages received from TAMAICA HOSKINS to KESHIA LANIER.

117. On or about November 14, 2013, TRACY MITCHELL received text messages from TAMAICA HOSKINS regarding federal tax refund checks for A.Co. in the amount of \$3,094 and for Ju.Co. in the amount of \$3,141.

118. On or about November 25, 2013, TRACY MITCHELL forwarded text messages to KESHIA LANIER regarding federal tax refund checks for M.Fa. in the amount of \$2,964 and for C.Ba. in the amount of \$2,992.

119. On or about November 25, 2013, TRACY MITCHELL forwarded text messages to KESHIA LANIER regarding a federal tax refund check for H.Gu. in the amount of \$3,267.

120. On or about December 5, 2013, LATASHA MITCHELL sent a text message to TRACY MITCHELL listing L.Le.'s name, date of birth, Social Security number, and tax refund amount.

121. On or about December 17, 2013, TRACY MITCHELL possessed fifteen or more unauthorized access devices, namely the names, social security numbers, and dates of birth of individuals.

122. On or about December 17, 2013, DAMEISHA MITCHELL possessed fifteen or more unauthorized access devices, namely the names, social security numbers, and dates of birth of individuals.

123. On or about December 17, 2013, TRACY MITCHELL stored over \$300,000 in illicit proceeds at her residence.

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

COUNTS TWO THROUGH THIRTY-THREE
(Wire Fraud)

1. The factual allegations contained in Paragraphs 1 through 8 of the Introduction Section of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

2. From in or about January 2011 through in or about December 2013, within the Middle District of Alabama and elsewhere, the defendants listed below, having knowingly and intentionally devised and intended to devise a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses, representations, and promises, caused to be transmitted by means of wire communication in interstate commerce, communications, signals, and writings, to wit: electronically filed tax returns.

THE SCHEME AND ARTIFICE

3. The allegations contained Paragraphs 1 through 9 of Count 1 of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

THE WIRE COMMUNICATIONS

4. On or about each date listed below, in the Middle District of Alabama, the defendants listed below, for the purpose of executing the scheme and artifice to defraud, and to aid and abet the same, transmitted, and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds as described for each count below:

Count	Defendants	Date of Offense	Wire Communication
2	TRACY MITCHELL KESHIA LANIER MEQUETTA SNELL- QUICK	02/23/2013	Electronically Filed Tax Return in the name of E.To. claiming a tax refund of \$2,652
3	TRACY MITCHELL KESHIA LANIER MEQUETTA SNELL- QUICK	02/23/2013	Electronically Filed Tax Return in the name of Je.Co. claiming a tax refund of \$2,652
4	TRACY MITCHELL	03/05/2013	Electronically Filed Tax Return in the name of A.Re. claiming a tax refund of \$2,279
5	TRACY MITCHELL	03/05/2013	Electronically Filed Tax Return in the name of C.Ro. claiming a tax refund of \$2,321
6	TRACY MITCHELL	03/05/2013	Electronically Filed Tax Return in the name of C.In. claiming a tax refund of \$2,287
7	TRACY MITCHELL	03/05/2013	Electronically Filed Tax Return in the name of J.Ca. claiming a tax refund of \$2,312
8	TRACY MITCHELL	03/09/2013	Electronically Filed Tax Return in the name of T.Br. claiming a tax refund of \$1,890
9	TRACY MITCHELL	03/10/2013	Electronically Filed Tax Return in the name of N.Su. claiming a tax refund of \$2,295
10	TRACY MITCHELL	03/10/2013	Electronically Filed Tax Return in the name of T.Co. claiming a tax refund of \$2,209
11	TRACY MITCHELL TALARUIS PAIGE	03/11/2013	Electronically Filed Tax Return in the name of D.Tu. claiming a tax refund of \$2,804
12	TRACY MITCHELL TALARUIS PAIGE	03/11/2013	Electronically Filed Tax Return in the name of J.Cu. claiming a tax refund of \$2,966

Count	Defendants	Date of Offense	Wire Communication
13	TRACY MITCHELL TALARUIS PAIGE	03/11/2013	Electronically Filed Tax Return in the name of V.De. claiming a tax refund of \$5,954
14	TRACY MITCHELL	03/16/2013	Electronically Filed Tax Return in the name of M.Go. claiming a tax refund of \$5,079
15	KESHIA LANIER MEQUETTA SNELL- QUICK	03/16/2013	Electronically Filed Tax Return in the name of K.Hu. claiming a tax refund of \$1,000
16	KESHIA LANIER MEQUETTA SNELL- QUICK	03/16/2013	Electronically Filed Tax Return in the name of D.Hu. claiming a tax refund of \$1,000
17	KESHIA LANIER MEQUETTA SNELL- QUICK	03/16/2013	Electronically Filed Tax Return in the name of A.Ho. claiming a tax refund of \$1,000
18	KESHIA LANIER MEQUETTA SNELL- QUICK	04/07/2013	Electronically Filed Tax Return in the name of D.Ea. claiming a tax refund of \$1,066
19	KESHIA LANIER MEQUETTA SNELL- QUICK	04/07/2013	Electronically Filed Tax Return in the name of A.Ra. claiming a tax refund of \$1,102
20	KESHIA LANIER MEQUETTA SNELL- QUICK	04/07/2013	Electronically Filed Tax Return in the name of C.Ec. claiming a tax refund of \$1,069
21	TRACY MITCHELL	07/10/2013	Electronically Filed Tax Return in the name of F.Sh. claiming a tax refund of \$2,180
22	TRACY MITCHELL	07/10/2013	Electronically Filed Tax Return in the name of I.Sm. claiming a tax refund of \$2,291
23	LATASHA MITCHELL	07/23/2013	Electronically Filed Tax Return in the name of B.Sc. claiming a tax refund of \$3,225
24	LATASHA MITCHELL	07/23/2013	Electronically Filed Tax Return in the name of S.Sm. claiming a tax refund of \$3,255
25	LATASHA MITCHELL	07/23/2013	Electronically Filed Tax Return in the name of M.Sp. claiming a tax refund of \$3,390

Count	Defendants	Date of Offense	Wire Communication
26	LATASHA MITCHELL	07/23/2013	Electronically Filed Tax Return in the name of J.Sc. claiming a tax refund of \$3,306
27	LATASHA MITCHELL	07/23/2013	Electronically Filed Tax Return in the name of K.St. claiming a tax refund of \$3,306
28	LATASHA MITCHELL	07/23/2013	Electronically Filed Tax Return in the name of I.Sa. claiming a tax refund of \$3,606
29	LATASHA MITCHELL	07/23/2013	Electronically Filed Tax Return in the name of R.Ca. claiming a tax refund of \$3,225
30	TRACY MITCHELL	08/13/2013	Electronically Filed Tax Return in the name of D.Pu. claiming a tax refund of \$2,662
31	TRACY MITCHELL	08/13/2013	Electronically Filed Tax Return in the name of K.Pe. claiming a tax refund of \$2,584
32	TRACY MITCHELL	08/13/2013	Electronically Filed Tax Return in the name of C.Po. claiming a tax refund of \$2,603
33	TRACY MITCHELL	11/12/2013	Electronically Filed Tax Return in the name of A.St. claiming a tax refund of \$2,662

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

COUNTS THIRTY-FOUR THROUGH FIFTY-SEVEN

(Mail Fraud)

1. The factual allegations contained in Paragraphs 1 through 8 of the Introduction Section of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

2. From in or about January 2011 through in or about December 2013, within the Middle District of Alabama and elsewhere, the defendants listed below having knowingly and intentionally devised and participated in a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses, representations, and promises, caused to be placed in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the United States Postal Service (“Postal Service”), and did take and receive matters and things that had been delivered by the Postal Service, namely federal income tax refund checks, as described below.

THE SCHEME AND ARTIFICE

3. The allegations contained Paragraphs 1 through 9 of Count 1 of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

THE MAILINGS

4. On or about each date listed below, in the Middle District of Alabama and elsewhere, the defendants listed below, for the purpose of executing the scheme and artifice to defraud, and to aid and abet the same, caused to be placed in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service and did take and receive matters and things that had been delivered by the Postal Service, namely, federal income tax refund checks, as described below:

Count	Defendant	Date of Offense	Mailing
34	DAMEISHA MITCHELL	07/19/2013	A United States Treasury Check in the name of A.Hu., addressed to A.Hu., on Stadium Drive, in Phenix City, Alabama

Count	Defendant	Date of Offense	Mailing
35	DAMEISHA MITCHELL	07/19/2013	A United States Treasury Check in the name of J.Hu., addressed to J.Hu., on Stadium Drive, in Phenix City, Alabama
36	DAMEISHA MITCHELL	07/19/2013	A United States Treasury Check in the name of J.Ho., addressed to J.Ho., on Stadium Drive, in Phenix City, Alabama
37	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	A United States Treasury Check in the name of S.Pe., addressed to S.Pe., on Ponderosa Drive, in Phenix City, Alabama
38	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	A United States Treasury Check in the name of Jo.Co., addressed to Jo.Co., on Ponderosa Drive, in Phenix City, Alabama
39	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	A United States Treasury Check in the name of D.Ch., addressed to D.Ch., on Ponderosa Drive, in Phenix City, Alabama
40	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	A United States Treasury Check in the name of K.Po., addressed to K.Po., on Ponderosa Drive, in Phenix City, Alabama
41	TRACY MITCHELL DAMEISHA MITCHELL	08/16/2013	A United States Treasury Check in the name of V.Pa., addressed to V.Pa., on Ponderosa, in Phenix City, Alabama
42	TRACY MITCHELL KESHIA LANIER	08/23/2013	A United States Treasury Check in the name of H.Gu., addressed to H.Gu., on Forrest Drive, in Phenix City, Alabama
43	TRACY MITCHELL KESHIA LANIER	09/09/2013	A United States Treasury Check in the name of M.Fa., addressed to M.Fa., on Skylark Drive, in Phenix City, Alabama
44	TRACY MITCHELL LATASHA MITCHELL	09/09/2013	A United States Treasury Check in the name of L.Le., addressed to L.Le., on Armour Drive, in Phenix City, Alabama
45	TRACY MITCHELL KESHIA LANIER	09/13/2013	A United States Treasury Check in the name of C.Ba., addressed to C.Ba., on Skylark Drive, in Phenix City, Alabama

Count	Defendant	Date of Offense	Mailing
46	TRACY MITCHELL DAMEISHA MITCHELL SHARONDRA JOHNSON CYNTHIA JOHNSON	09/20/2013	A United States Treasury Check in the name of J.So., addressed to J.So., on Ladonia Drive, in Phenix City, Alabama
47	TRACY MITCHELL DAMEISHA MITCHELL SHARONDRA JOHNSON CYNTHIA JOHNSON	09/20/2013	A United States Treasury Check in the name of A.Mi., addressed to A.Mi., on Ladonia Drive, in Phenix City, Alabama
48	TRACY MITCHELL DAMEISHA MITCHELL SHARONDRA JOHNSON	09/20/2013	A United States Treasury Check in the name of J.Sa., addressed to J.Sa., on Ladonia Drive, in Phenix City, Alabama
49	TRACY MITCHELL DAMEISHA MITCHELL SHARONDRA JOHNSON	09/20/2013	A United States Treasury Check in the name of D.Da., addressed to D.Da., on Ladonia Drive, in Phenix City, Alabama
50	TRACY MITCHELL TAMAICA HOSKINS	10/25/2013	A United States Treasury Check in the name of A.Co., addressed to A.Co., on Lake Drive, in Phenix City, Alabama
51	TRACY MITCHELL TAMAICA HOSKINS	10/25/2013	A United States Treasury Check in the name of Ju.Co., addressed to Ju.Co., on Lake Drive, in Phenix City, Alabama
52	TRACY MITCHELL DAMEISHA MITCHELL SHARONDRA JOHNSON	10/25/2013	A United States Treasury Check in the name of A.Ba., addressed to A.Ba., on Gunsmoke Trail, in Phenix City, Alabama
53	TRACY MITCHELL DAMEISHA MITCHELL SHARONDRA JOHNSON	10/25/2013	A United States Treasury Check in the name of Z.Ya., addressed to Z.Ya., on Gunsmoke Trail, in Phenix City, Alabama
54	DAMEISHA MITCHELL	11/22/2013	A United States Treasury Check in the name of H.Lo., addressed to H.Lo., on Juniper Drive, in Phenix City, Alabama
55	DAMEISHA MITCHELL	12/02/2013	A United States Treasury Check in the name of A.Wi., addressed to A.Wi., on Ladonia Drive, in Phenix City, Alabama

Count	Defendant	Date of Offense	Mailing
56	DAMEISHA MITCHELL	12/02/2013	A United States Treasury Check in the name of J.Lo., addressed to J.Lo., on Juniper Drive, in Phenix City, Alabama
57	DAMEISHA MITCHELL	12/02/2013	A United States Treasury Check in the name of A.Pi., addressed to A.Pi., on Juniper Drive, in Phenix City, Alabama

All in violation of Title 18, United States Code, Section 1341.

COUNTS FIFTY-EIGHT THROUGH ONE HUNDRED THIRTEEN
(Aggravated Identity Theft)

1. The factual allegations contained in Paragraphs 1 through 8 of the Introduction Section of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

2. On or about the dates listed below, within the Middle District of Alabama and elsewhere, the Defendants listed below did knowingly use the means of identification of other persons without lawful authority during and in relation to the offenses in this Indictment identified as Related Counts below, that is, she knowingly used the names and Social Security numbers of actual persons known to the grand jury, listed by their initials below, to commit wire and mail fraud:

Count	Defendants	Date of Offense	Related Count	Individual
58	TRACY MITCHELL KESHIA LANIER MEQUETTA SNELL-QUICK	02/23/2013	2	E.To.
59	TRACY MITCHELL KESHIA LANIER MEQUETTA SNELL-QUICK	02/23/2013	3	Je.Co.
60	TRACY MITCHELL	03/05/2013	4	A.Re.

Count	Defendants	Date of Offense	Related Count	Individual
61	TRACY MITCHELL	03/05/2013	5	C.Ro.
62	TRACY MITCHELL	03/05/2013	6	C.In.
63	TRACY MITCHELL	03/05/2013	7	J.Ca.
64	TRACY MITCHELL	03/09/2013	8	T.Br.
65	TRACY MITCHELL	03/10/2013	9	N.Su.
66	TRACY MITCHELL	03/10/2013	10	T.Co.
67	TRACY MITCHELL TALARUIS PAIGE	03/11/2013	11	D.Tu.
68	TRACY MITCHELL TALARUIS PAIGE	03/11/2013	12	J.Cu.
69	TRACY MITCHELL TALARUIS PAIGE	03/11/2013	13	V.De.
70	TRACY MITCHELL	03/16/2013	14	M.Go.
71	KESHIA LANIER MEQUETTA SNELL-QUICK	03/16/2013	15	K.Hu.
72	KESHIA LANIER MEQUETTA SNELL-QUICK	03/16/2013	16	D.Hu.
73	KESHIA LANIER MEQUETTA SNELL-QUICK	03/16/2013	17	A.Ho.
74	KESHIA LANIER MEQUETTA SNELL-QUICK	04/07/2013	18	D.Ea.
75	KESHIA LANIER MEQUETTA SNELL-QUICK	04/07/2013	19	A.Ra.
76	KESHIA LANIER MEQUETTA SNELL-QUICK	04/07/2013	20	C.Ec.
77	TRACY MITCHELL	07/10/2013	21	F.Sh.
78	TRACY MITCHELL	07/10/2013	22	I.Sm.
79	LATASHA MITCHELL	07/23/2013	23	B.Sc.
80	LATASHA MITCHELL	07/23/2013	24	S.Sm.
81	LATASHA MITCHELL	07/23/2013	25	M.Sp.
82	LATASHA MITCHELL	07/23/2013	26	J.Sc.
83	LATASHA MITCHELL	07/23/2013	27	K.St.

Count	Defendants	Date of Offense	Related Count	Individual
84	LATASHA MITCHELL	07/23/2013	28	I.Sa.
85	LATASHA MITCHELL	07/23/2013	29	R.Ca.
86	TRACY MITCHELL	08/13/2013	30	D.Pu.
87	TRACY MITCHELL	08/13/2013	31	K.Pe.
88	TRACY MITCHELL	08/13/2013	32	C.Po.
89	TRACY MITCHELL	11/12/2013	33	A.St.
90	DAMEISHA MITCHELL	07/19/2013	34	A.Hu.
91	DAMEISHA MITCHELL	07/19/2013	35	J.Hu.
92	DAMEISHA MITCHELL	07/19/2013	36	J.Ho.
93	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	37	S.Pe.
94	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	38	Jo.Co.
95	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	39	D.Ch.
96	TRACY MITCHELL TAMAICA HOSKINS	08/16/2013	40	K.Po.
97	TRACY MITCHELL DAMEISHA MITCHELL	08/16/2013	41	V.Pa.
98	TRACY MITCHELL KESHIA LANIER	08/23/2013	42	H.Gu.
99	TRACY MITCHELL KESHIA LANIER	09/09/2013	43	M.Fa.
100	TRACY MITCHELL LATASHA MITCHELL	09/09/2013	44	L.Le
101	TRACY MITCHELL KESHIA LANIER	09/13/2013	45	C.Ba.

Count	Defendants	Date of Offense	Related Count	Individual
102	TRACY MITCHELL DAMEISHA MITCHELL SHARONDR A JOHNSON CYNTHIA JOHNSON	09/20/2013	46	J.So.
103	TRACY MITCHELL DAMEISHA MITCHELL SHARONDR A JOHNSON CYNTHIA JOHNSON	09/20/2013	47	A.Mi.
104	TRACY MITCHELL DAMEISHA MITCHELL SHARONDR A JOHNSON	09/20/2013	48	J.Sa.
105	TRACY MITCHELL DAMEISHA MITCHELL SHARONDR A JOHNSON	09/20/2013	49	D.Da.
106	TRACY MITCHELL TAMAICA HOSKINS	10/25/2013	50	A.Co.
107	TRACY MITCHELL TAMAICA HOSKINS	10/25/2013	51	Ju.Co.
108	TRACY MITCHELL DAMEISHA MITCHELL SHARONDR A JOHNSON	10/25/2013	52	A.Ba.
109	TRACY MITCHELL DAMEISHA MITCHELL SHARONDR A JOHNSON	10/25/2013	53	Z.Ya.
110	DAMEISHA MITCHELL	11/22/2013	54	H.Lo.
111	DAMEISHA MITCHELL	12/02/2013	55	A.Wi.
112	DAMEISHA MITCHELL	12/02/2013	56	J.Lo.
113	DAMEISHA MITCHELL	12/02/2013	57	A.Pi.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5).

COUNT ONE HUNDRED FOURTEEN
(Possession of Unauthorized Access Devices)

1. The factual allegations contained in Paragraphs 1 through 8 of the Introduction Section of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

2. On or about December 17, 2013, in the Middle District of Alabama, defendant TRACY MITCHELL, knowingly and with intent to defraud, possessed fifteen or more unauthorized access devices, namely, Social Security numbers belonging to third-parties, without their knowledge or consent, the possession of which affected interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

COUNT ONE HUNDRED FIFTEEN
(Possession of Unauthorized Access Devices)

1. The factual allegations contained in Paragraphs 1 through 8 of the Introduction Section of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

2. On or about December 17, 2013, in the Middle District of Alabama, defendant DAMEISHA MITCHELL, knowingly and with intent to defraud, possessed fifteen or more unauthorized access devices, namely, Social Security numbers belonging to third-parties, without their knowledge or consent, the possession of which affected interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

COUNT ONE HUNDRED SIXTEEN
(Possession of Unauthorized Access Devices)

1. The factual allegations contained in Paragraphs 1 through 8 of the Introduction Section of this Superseding Indictment are realleged and incorporated herein as if copied verbatim.

2. On or about April 10, 2014, in the Middle District of Alabama, defendant KESHIA LANIER, knowingly and with intent to defraud, possessed fifteen or more unauthorized access devices, namely, Social Security numbers belonging to third-parties, without their knowledge or consent, the possession of which affected interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

FORFEITURE ALLEGATION - 1

A. The allegations contained in Counts 2 through 57 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

B. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1343, set forth in Counts 2 through 33, and Section 1341, set forth in Counts 34 through 57, of this Superseding Indictment, the Defendants,

**TRACY MITCHELL,
DAMEISHA MITCHELL,
LATASHA MITCHELL,
KESHIA LANIER,
TAMAICA HOSKINS,
SHARONDR A JOHNSON,
CYNTHIA JOHNSON,
MEQUETTA SNELL-QUICK, and
TALARIUS PAIGE,**

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 property, real or personal, which constitutes or is derived from proceeds of said violations, including, but not limited to, the following:

JUDGMENT

A Judgment in the amount of approximately \$20,000,000.00.

CURRENCY

United States currency in the amount of \$329,242.00 seized from Tracy Mitchell, at 106 Richburg Street, Phenix City, Alabama, on or about December 17, 2013.

C. If any of the property described in this forfeiture allegation, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third-party
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) 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 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

FORFEITURE ALLEGATION - 2

A. The allegations contained in Counts 114 through 116 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(B), and 1029(c)(1)(C).

B. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1029 set forth in Counts 114 through 116 of this Superseding Indictment, the defendants,

**TRACY MITCHELL,
DAMEISHA MITCHELL, and
KESHIA LANIER,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations; and pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to facilitate and commit the offenses. The property includes, but is not limited to the following,

JUDGMENT

A Judgment in the amount of approximately \$20,000,000.00.

CURRENCY

United States currency in the amount of \$329,242.00 seized from Tracy Mitchell, at 106 Richburg Street, Phenix City, Alabama, on or about December 17, 2013.

PERSONAL PROPERTY

Computers
Approximately eight cellular phones.

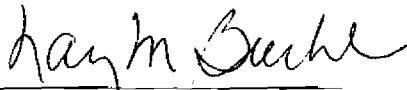
C. If any of the property described above, as a result of any act or omission of the defendants:

- (1). cannot be located upon the exercise of due diligence;
- (2). has been transferred or sold to, or deposited with, a third-party;
- (3). has been placed beyond the jurisdiction of the court;
- (4). has been substantially diminished in value; or
- (5). has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

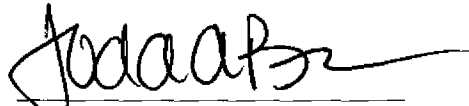
All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C).

TRUE BILL:




Foreperson

GEORGE L. BECK, JR.
United States Attorney



Todd A. Brown
Tommie Brown Hardwick
Assistant United States Attorneys



Michael C. Boteler
Trial Attorney
United States Department of Justice
Tax Division