

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS**

UNITED STATES OF AMERICA)	No.
)	
)	26 U.S.C. § 7206(2)
V.)	42 U.S.C. § 408(a)(8)
)	18 U.S.C. § 1028A(a)(1)
)	18 U.S.C. § 3013
SHARON MEYERS-WASHINGTON)	18 U.S.C. § 3571

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNTS 1-24

1. At all times material herein:

(a) SHARON MEYERS-WASHINGTON was an employee of the Social Security Administration, Office of Disability, Adjudication and Review, and served as a Case Intake Specialist. SHARON MEYERS-WASHINGTON also worked as a tax return preparer for Jackson Hewitt for tax years 2005 and 2006, and for JBL Rapid Refunds for the tax year 2007.

(b) In the course of preparing tax returns for others, SHARON MEYERS-WASHINGTON made and caused to be made material false statements, among which are the following:

- (1) Falsely claiming/inflating Schedule A deductions;
- (2) Falsely claiming a filing status;
- (3) Falsely claiming a dependent;
- (4) Falsely claiming/increasing the earned income credit;
- (5) Falsely claiming/increasing the child tax credit;
- (6) Falsely claiming/increasing the additional child tax credit;
- (7) Falsely claiming child care expense;
- (8) Falsely claiming education credit.

2. On or about the dates hereinafter set forth, in the Eastern District of Arkansas, and elsewhere, the defendant, SHARON MEYERS-WASHINGTON, 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 taxpayers and calendar years hereinafter specified. The returns were false and fraudulent as to material matters, in that they represented that the taxpayers were entitled under the provisions of the Internal Revenue laws to claim deductions and credits for items and in amounts hereinafter specified, whereas, as the defendant then and there knew, the taxpayers were not entitled to claim deductions in the claimed amounts, each tax return constituting a separate charge:

COUNT	DATE OF OFFENSE	TAXPAYER	CALENDAR YEAR	FALSELY CLAIMED ITEM	TAX LOSS
1	January 24, 2007	DB	2006	1.(b)(1)	\$2,094.00
2	January 17, 2007	CD	2006	1.(b)(2);(3);(4)	\$3,986.00
3	February 2, 2008	CD	2007	1.(b)(2);(3);(4); (6)	\$5,731.00
4	February 5, 2007	MF	2006	1.(b)(1);(8)	\$2,270.00
5	February 4, 2008	MF	2007	1.(b)(1);(2);(3);(4);(5);(6);(7)	\$4,931.00
6	February 1, 2008	JG	2007	1.(b)(1);(2);(3);(4);(6);(7)	\$6,606.00
7	January 31, 2008	BG	2007	1.(b)(1);(3);(5);(6)	\$4,490.00
8	January 31, 2008	CG	2007	1.(b)(1);(3);(5);(6)	\$2,924.00
9	January 13, 2007	RH	2006	1.(b)(2);(3);(4);(5);(6)	\$6,265.00
10	January 18, 2007	DJ	2006	1.(b)(1);(2);(3);(4);(5);(6)	\$4,375.00
11	January 22, 2008	DJ	2007	1.(b)(1);(2);(3);(5);(6);(7)	\$4,806.00
12	February 8, 2007	WJ	2006	1.(b)(2);(3);(4);(5); (6)	\$5,512.00

COUNT	DATE OF OFFENSE	TAXPAYER	CALENDAR YEAR	FALSELY CLAIMED ITEM	TAX LOSS
13	January 29, 2008	WJ	2007	1.(b)(2);(3);(4)	\$5,010.00
14	February 10, 2007	DL	2006	1.(b)(2);(3);(4);(5); (6)	\$5,808.00
15	February 5, 2008	JM	2007	1.(b)(1);(3)	\$778.00
16	February 10, 2007	FM	2006	1.(b)(2);(3);(4);(8)	\$4,872.00
17	January 24, 2008	FM II	2007	1.(b)(2);(3);(4);(5); (6)	\$6,399.00
18	February 6, 2008	SR	2007	1.(b)(1);(2);(4);(6); (7)	\$3,130.00
19	February 12, 2007	CS	2006	1.(b)(1);(8)	\$2,660.00
20	January 31, 2008	MT	2007	1.(b)(2);(3);(4);(6)	\$3,310.00
21	January 18, 2007	ST	2006	1.(b)(1);(2);(3)	\$5,479.00
22	January 25, 2008	ST	2007	1.(b)(1);(2);(3);(5);(6);(7)	\$7,089.00
23	February 1, 2008	Y&CT	2007	1.(b)(1)	\$2,705.00
24	January 30, 2008	TW	2007	1.(b)(2);(3);(4);(6); (7)	\$6,706.00
			TOTAL:		\$107,936.00

All in violation of Title 26, United States Code, Section 7206(2).

COUNTS 25-58

1. The Grand Jury realleges each allegation contained in paragraphs 1(a) and (b)(3) of Counts 1-24 and incorporates them as if fully set forth herein.

2. The Social Security Administration is an independent agency of the Federal Government that administers Social Security, a social insurance program consisting of retirement, disability, and survivors' benefits.

3. A Social Security number (SSN) is a nine-digit number issued to U.S. citizens, permanent residents, and temporary (working) residents under section 205(c)(2) of the Social Security Act, codified as 42 U.S.C. 405(c)(2). The number is issued to an individual by the Social Security Administration. Its primary purpose is to track individuals for taxation purposes. Disclosure of Social Security numbers is limited or prohibited by law, pursuant to Title 42 United States Code Section .

4. In the performance of her work, SHARON MEYERS-WASHINGTON had authorization to look at and retrieve certain Social Security numbers relating to her work. From in or about January 2007 through in or about June of 2008, SHARON MEYERS-WASHINGTON looked and retrieved certain Social Security numbers which exceeded her authority.

5. On or about the dates listed below, in the Eastern District of Arkansas, the defendant,

SHARON MEYERS-WASHINGTON

did knowingly use and attempt to use without lawful authority, a means of identification of the below-listed individuals, that is the corresponding Social Security number, with the intent to commit a violation of law, that is, the corresponding violation of Title 26, United States Code, Section 7206(2), aiding and abetting false statement in a tax document:

COUNT	DATE	INDIVIDUAL	SOCIAL SECURITY NUMBER	CORRESPONDING TAX COUNT
25	January 17, 2007	KJ	xxx-xx-6520	2
26	January 17, 2007	VR	xxx-xx-8584	2
27	February 2, 2008	PF	xxx-xx-1622	3
28	February 2, 2008	SRM	xxx-xx-0013	3
29	February 4, 2008	MB	xxx-xx-2195	5
30	February 1, 2008	SE	xxx-xx-8215	6
31	February 1, 2008	MM	xxx-xx-1793	6
32	January 31, 2008	JW	xxx-xx-4498	7
33	January 31, 2008	TW	xxx-xx-9312	7
34	January 31, 2008	TA	xxx-xx-0610	8

35	January 13, 2007	JM	xxx-xx-2295	9
36	January 13, 2007	MM	xxx-xx-1793	9
37	January 18, 2007	AH	xxx-xx-0911	10
38	January 18, 2007	CH	xxx-xx-1399	10
39	January 22, 2008	LB	xxx-xx-3166	11
40	February 8, 2007	BW	xxx-xx-7659	12
41	February 8, 2007	KYW	xxx-xx-7825	12
42	January 29, 2008	LM	xxx-xx-8728	13
43	January 29, 2008	LM	xxx-xx-4622	13
44	February 10, 2007	CD	xxx-xx-9481	14
45	February 10, 2007	JD	xxx-xx-2562	14
46	February 5, 2008	CM	xxx-xx-6396	15
47	February 10, 2007	MB	xxx-xx-4981	16
48	February 10, 2007	RL	xxx-xx-4544	16
49	January 24, 2008	BB	xxx-xx-6548	17

50	January 24, 2008	BB	xxx-xx-8167	17
51	January 31, 2008	DS	xxx-xx-6859	20
52	January 31, 2008	VR	xxx-xx-8584	20
53	January 18, 2007	CJ	xxx-xx-9337	21
54	January 18, 2007	YR	xxx-xx-0672	21
55	January 25, 2008	JM	xxx-xx-2295	22
56	January 25, 2008	DJ	xxx-xx-9078	22
57	January 30, 2008	AM	xxx-xx-3943	24
58	January 30, 2008	JR	xxx-xx-9521	24

All in violation of Title 42, United States Code, Section 408(a)(8).

COUNT 59

1. The Grand Jury realleges each allegation contained in paragraphs 1(a) and (b)(3) of Counts 1-24, and paragraphs 2-4 of Counts 25-58, and incorporates them as if fully set forth herein.

2. On or about February 4, 2008, in the Eastern District of Arkansas, the defendant, SHARON MEYERS-WASHINGTON, did knowingly transfer, possess, and use, without

lawful authority, a means of identification of another person, during and in relation to those acts constituting a violation of Title 42, United States Code, Section 408(a)(8), charged in Count 29 above.

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

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A TRUE BILL

FOREPERSON

JANE W. DUKE
United States Attorney

GEORGE C. VENA
Assistant U.S. Attorney
AR BAR NO. 80155
george.vena@usdoj.gov
P.O. Box 1229
Little Rock, AR 72203
(501) 340-2624