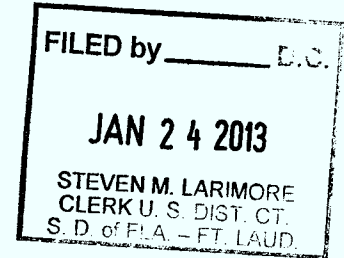


SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 13-60018-CR-ROSENBAUM

- 18 U.S.C. § 1029(a)(3)
- 18 U.S.C. § 1028(a)(7)
- 18 U.S.C. § 641
- 18 U.S.C. § 1028A(a)(1)
- 18 U.S.C. § 1708
- 42 U.S.C. § 1320d-6
- 18 U.S.C. § 286



UNITED STATES OF AMERICA

vs.

TANISHA WRIGHT
and
SHALAMAR MAJOR,

Defendants.

_____ /

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Access Device Fraud, 18 U.S.C. § 1029(a)(3))

On or about June 27, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did, knowingly and with intent to defraud, possess fifteen or more unauthorized access devices, affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT 2

(Identity Theft, 18 U.S.C. § 1028(a)(7))

On or about May 8, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did knowingly possess, without lawful authority, in and affecting interstate commerce, a means of identification of another person, that is, the name, date of birth, and social security number of an individual bearing the initials "E.E.," any one of which would constitute a violation, with the intent to commit, and to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, that is, Theft of Public Money, in violation of Title 18, United States Code, Section 641, and as a result of the offense obtained anything of value aggregating \$1,000 or more during any one year period, all in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT 3

(Theft of Public Money - 18 U.S.C. § 641)

On or about May 16, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did knowingly and willfully receive, conceal and retain stolen property of the United States, that is, a \$6,433.00 United States income tax refund issued by the Department of the Treasury, a department of the United States government, with the intent to convert it to her use or gain, in violation of Title 18, United States Code, Section 641.

COUNT 4

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

On or about May 16, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

during and in relation to a felony violation of Title 18, United States Code, Section 641, that is, Theft of Public Money, as charged in Count 3 of this Indictment, did knowingly possess and use without lawful authority a means of identification of another person, that is, the name and account number of an individual bearing the initials "J.R.," any one of which would constitute a violation, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 5

(Identity Theft, 18 U.S.C. § 1028(a)(7))

On or about May 18, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did knowingly possess, without lawful authority, in and affecting interstate commerce, a means of identification of another person, that is, the name, date of birth, and social security number of an individual bearing the initials "G.V.," any one of which would constitute a violation, with the intent to commit, and to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, that is, Theft of Public Money, in violation of Title 18, United States Code, Section 641, and as a result of the offense obtained anything of value aggregating \$1,000 or more during any one year period, all in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT 6

(Theft of Public Money - 18 U.S.C. § 641)

On or about May 31, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did knowingly and willfully receive, conceal and retain stolen property of the United States, that is, a \$5,097.00 United States income tax refund issued by the Department of the Treasury, a department of the United States government, with the intent to convert it to her use or gain, in violation of Title 18, United States Code, Section 641.

COUNT 7

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

On or about May 31, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

during and in relation to a felony violation of Title 18, United States Code, Section 641, that is, Theft of Public Money, as charged in Count 6 of this Indictment, did knowingly possess and use without lawful authority a means of identification of another person, that is, the name and account number of an individual bearing the initials "L.S.," any one of which would constitute a violation, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 8

(Identity Theft, 18 U.S.C. § 1028(a)(7))

On or about May 27, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did knowingly possess, without lawful authority, in and affecting interstate commerce, a means of identification of another person, that is, the name, date of birth, and social security number of an individual bearing the initials "C.S.," any one of which would constitute a violation, with the intent to commit, and to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, that is, Theft of Public Money, in violation of Title 18, United States Code, Section 641, and as a result of the offense obtained anything of value aggregating \$1,000 or more during any one year period, all in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT 9

(Theft of Public Money - 18 U.S.C. § 641)

On or about June 6, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did knowingly and willfully receive, conceal and retain stolen property of the United States, that is, a \$8,083.00 United States income tax refund issued by the Department of the Treasury, a department of the United States government, with the intent to convert it to her use or gain, in violation of Title 18, United States Code, Section 641.

COUNT 10

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

On or about June 6, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

during and in relation to a felony violation of Title 18, United States Code, Section 641, that is, Theft of Public Money, as charged in Count 9 of this Indictment, did knowingly possess and use without lawful authority a means of identification of another person, that is, the name and account number of an individual bearing the initials "A.W.," any one of which would constitute a violation, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 11

(Theft of Mail - 18 U.S.C. § 1708)

On or about June 27, 2012, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TANISHA WRIGHT,

did unlawfully have in her possession, any letter and mail and any article contained therein, which had been stolen and taken, knowing the same to have been stolen and taken, in violation of Title 18, United States Code, Section 1708.

COUNT 12

(HIPAA - 42 U.S.C. § 1320d-6)

Beginning in or about January 2012, through at least June 27, 2012, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

SHALAMAR MAJOR,

then an employee of a health care provider, knowingly and without authorization, disclosed and caused to be disclosed to another person individually identifiable health information relating to an individual, that is, patient names, dates of birth, and Social Security numbers, with the intent to sell, transfer, use, and cause to be used, individually identifiable health information, for personal gain, in violation of Title 42, United States Code, Sections 1320d-6(a)(3) and (b)(3) and Title 18, United States Code, Section 2.

COUNT 13

(CONSPIRACY TO COMMIT FALSE CLAIMS - 18 U.S.C. § 286)

Beginning in or about January, 2012 and continuing until in or about June 27, 2012, the exact dates being unknown to the Grand Jury, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**TANISHA WRIGHT
and
SHALAMAR MAJOR,**

did knowingly and willfully combine, conspire, confederate and agree with each other to defraud the United States by obtaining and aiding to obtain the payment or allowance of false, fictitious, and fraudulent claims.

OBJECT OF THE CONSPIRACY

1. It was the object of the conspiracy that the defendants, **TANISHA WRIGHT** and **SHALAMAR MAJOR**, would and did unjustly enrich and attempt to enrich themselves, by obtaining, possessing, and utilizing stolen personal identifying information to file and submit to the Internal Revenue Service (IRS), an agency of the United States government, false, fictitious, and fraudulent federal income tax returns claiming tax refunds to which they were not entitled.

MANNER AND MEANS

The manner and means by which the defendants sought to accomplish the object of the conspiracy, included the following:

2. Defendant **SHALAMAR MAJOR** was employed as a scheduler at the Boca Raton Regional Hospital in Boca Raton, Florida. As a scheduler, she had access to personal identification information of Boca Raton Regional Hospital patients, including their names, dates of birth, social security numbers, and other sensitive personal information.

3. In exchange for the promise of future payments, **SHALAMAR MAJOR** unlawfully provided **TANISHA WRIGHT** sensitive personal identifying information, including names, dates of birth, and social security numbers, of numerous Boca Raton Regional Hospital patients.

4. **TANISHA WRIGHT**, upon receipt of the sensitive personal identifying information of the Boca Raton Regional Hospital patients, utilized this information to file false, fictitious, and fraudulent federal income tax returns without the knowledge or authorization of the Boca Raton Regional Hospital patients, utilizing on-line tax preparation software via the internet, through either the internet connection located at her residence or other unsecured or


public wireless access points, and thereafter claimed refunds to which she was not entitled from the IRS.

5. **TANISHA WRIGHT** thereafter directed the IRS that the fraudulently claimed refunds be direct deposited onto pre-paid reloadable debit cards that were already in her possession. Once the debit cards had been funded by the Department of the Treasury, **TANISHA WRIGHT** would thereafter convert the funds on the debit cards to cash by making withdrawals at local automated teller machines (ATM's) or would utilize the debit cards herself to make personal purchases at various local businesses.

6. Once **TANISHA WRIGHT** obtained cash from the fraudulently funded debit cards, she would split the proceeds with **SHALAMAR MAJOR**.

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

A TRUE BILL



WIFREDO A. FERRER
UNITED STATES ATTORNEY



MARC S. ANTON
ASSISTANT U.S ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

TANISHA WRIGHT and
SHALAMAR MAJOR,

Defendants.

_____ /

Superseding Case Information:

Court Division: (Select One)

X Miami _____ Key West _____
FTL _____ WPB _____ FTP _____

New Defendant(s) Yes _____ No _____
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) NO
List language and/or dialect English

4. This case will take 4 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u>X</u>	Petty _____
II 6 to 10 days _____	Minor _____
III 11 to 20 days _____	Misdem. _____
IV 21 to 60 days _____	Felony <u>X</u>
V 61 days and over _____	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: _____ Case No. _____

(Attach copy of dispositive order)
Has a complaint been filed in this matter? (Yes or No) No

If yes:
Magistrate Case No. _____
Related Miscellaneous numbers: _____
Defendant(s) in federal custody as of _____
Defendant(s) in state custody as of _____
Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? _____ Yes X No



MARC S. ANTON
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No./Court No. 0148369

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TANISHA WRIGHT **Case No:** _____

Count #: 1

Access Device Fraud;

In violation of Title 18, United States Code, Section 1029(a)(3)

*** Max. Penalty:** 10 years' Imprisonment; \$250,000 fine or not more than the greater of twice the gross gain or twice the gross loss ; and 3 years' supervised release

Count #: 2, 5, 8

Identity Theft;

In violation of Title 18, United States Code, Section 1028(a)(7)

*** Max. Penalty:** 15 years' Imprisonment; \$250,000 fine or not more than the greater of twice the gross gain or twice the gross loss; and 3 years' supervised release

Count #: 3, 6, 9

Theft of Public Money;

In violation of Title 18, United States Code, Section 641

*** Max. Penalty:** 10 years' Imprisonment; \$250,000 fine or not more than the greater of twice the gross gain or twice the gross loss; and 3 years' supervised release

Count #: 4, 7, 10

Aggravated Identity Theft;

In violation of Title 18, United States Code, Section 1028A

*** Max. Penalty:** 2 years' Imprisonment consecutive to any other sentence imposed; \$250,000 fine; and 1 years' supervised release

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TANISHA WRIGHT **Case No:** _____

Count #: 11

Theft of Mail;

In violation of Title 18, United States Code, Section 1708

*** Max. Penalty:** 5 years' Imprisonment; \$250,000 fine; and 3 years' supervised release

Count #: 13

Conspiracy to Commit False Claims;

In violation of Title 18, United States Code, Section 286

*** Max. Penalty:** 10 years' Imprisonment; \$250,000 fine or not more than the greater of twice the gross gain or twice the gross loss; and 3 years' supervised release

Count #:

*** Max. Penalty:** _____

Count #:

*** Max. Penalty:** _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SHALAMAR MAJOR **Case No:** _____

Count #: 12

Unauthorized HIPAA Disclosures;

In violation of Title 42, United States Code, Section 1320d-6

*** Max. Penalty:** 10 years' Imprisonment; \$250,000 fine; and 3 years' supervised release

Count #: 13

Conspiracy to Commit False Claims;

In violation of Title 18, United States Code, Section 286

*** Max. Penalty:** 10 years' Imprisonment; \$250,000 fine or not more than the greater of twice the gross gain or twice the gross loss; and 3 years' supervised release

Count #:

***Max. Penalty:** _____

Count #:

***Max. Penalty:** _____

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**