

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

		Cr. No.
UNITED STATES OF AMERICA	:	Violations:
	:	18 U.S.C. § 1343 (Wire Fraud)
	:	18 U.S.C. § 1956(h) (Conspiracy To
v.	:	Commit Money Laundering)
	:	18 U.S.C. § 2 (Causing An Act To Be Done,
	:	And Aiding And Abetting)
	:	26 U.S.C. § 7201 (Federal Tax Evasion)
HARRIETTE MONICA WALTERS,	:	47 D.C. Code § 4101(a) (District of
	:	Columbia Tax Evasion)
Defendant.	:	22 D.C. Code § 1805 (Aiding And
	:	Abetting)
	:	18 U.S.C. § 982 (Criminal Forfeiture)
	:	18 U.S.C. § 981(a)(1)(C) (As Incorporated
	:	By 28 U.S.C. § 2461(c) (Criminal
	:	Forfeiture)

STATEMENT OF THE OFFENSES

Pursuant to Rule 11 of the Federal Rules of Criminal Procedure, defendant HARRIETTE MONICA WALTERS (hereinafter “WALTERS”) agrees and stipulates as follows:

INTRODUCTION

At times material to this Statement of the Offenses:

INDIVIDUALS INVOLVED IN OR RELATED TO THE SCHEME

1. WALTERS lived in the District of Columbia. In or around 1981, WALTERS began working for the District of Columbia government in the Department of Finance and Revenue, which later became the Office of Tax and Revenue (hereinafter “OTR”). OTR’s offices are located in the District of Columbia. In or about 2001, WALTERS became Manager of the Real Property Tax Administration Adjustments Unit (hereinafter “RPTAAU”) in OTR. As of in or about November 2007, WALTERS was a Grade 13, Step 7 level employee who was paid an annual salary of \$85,860 plus benefits.

2. Participant Five was a colleague of WALTERS in the District of Columbia government in or about the 1980s.

3. Individual Four was a close relative of WALTERS.

4. ALETHIA OLIVIA GROOMS (hereinafter "GROOMS") lived in the District of Columbia and Clinton, Maryland. GROOMS also used the names ALETHIA COVINGTON, ALETHIA MACK, and ALETHIA SLOAN. GROOMS was a real estate agent. WALTERS met GROOMS in or about the late 1980s, while the two attended an accounting class at the University of the District of Columbia. In or about 2004, GROOMS founded a company, AWESOME GRAPHIC DESIGNS, that was used in the scheme with WALTERS described below. As a participant in WALTERS's scheme, from in or about 1989 to in or about November 2007, and in addition to other proceeds of the scheme GROOMS received from WALTERS, GROOMS received \$433,710.61 through eleven fraudulently obtained District of Columbia property tax refund checks.

5. Participant Three was a friend of GROOMS. As a participant in WALTERS's scheme, in or about 1989, Participant Three received one fraudulently obtained District of Columbia property tax refund check in the amount of \$3,707.27.

6. Participant Four was a friend of GROOMS who lived in Maryland. As a participant in WALTERS's scheme, from in or about 1989 to in or about 1991, Participant Four received five fraudulently obtained District of Columbia property tax refund checks totaling \$26,211.31.

7. Individual Five was a close relative of GROOMS.

8. PATRICIA ANNE STEVEN, née FLOOD (hereinafter "PATRICIA STEVEN") lived in the District of Columbia and in Annapolis and Harwood, Maryland. PATRICIA STEVEN held herself out to be a doctor even though she had no medical training. PATRICIA STEVEN met

WALTERS in or about 1978, when WALTERS was working as a cook at a carry-out restaurant on Massachusetts Avenue, NW, near where PATRICIA STEVEN lived in an apartment with her husband. PATRICIA STEVEN became WALTERS's friend and mentor, advising WALTERS (who was approximately twenty years younger than PATRICIA STEVEN) on culture and fashion.

9. ROBERT OCHS STEVEN (hereinafter "ROBERT STEVEN") was married to PATRICIA STEVEN and lived in the District of Columbia and in Annapolis and Edgewater, Maryland. ROBERT STEVEN worked for the Internal Revenue Service from in or about 1975 to in or about December 2007.

10. PATRICIA STEVEN and ROBERT STEVEN formed a company called BELLARMINE DESIGNS (hereinafter "BELLARMINE") and opened bank accounts for that corporate entity. BELLARMINE was used in the scheme with WALTERS described below. As participants in WALTERS's scheme, from in or about 1990 to in or about November 2007, and in addition to other proceeds of the scheme they received from WALTERS, PATRICIA STEVEN and ROBERT STEVEN received \$7,893,310.32 through sixty-four fraudulently obtained District of Columbia property tax refund checks.

11. Individual Six was a close relative of PATRICIA and ROBERT STEVEN.

12. SAMUEL EARL POPE (hereinafter "POPE") lived in the District of Columbia. POPE operated a beauty salon, Head to Toe Salon, from in or about the late 1980s to in or about 2003. POPE opened the salon in the Waterside Mall and later moved it nearby to Fourth Street, in Southwest Washington, D.C. In or about the late 1980s, WALTERS started having her hair done at POPE's salon. POPE and WALTERS became good friends, and WALTERS came to trust POPE. In or about 1990, POPE obtained a chauffeur's license and began to operate a car service. POPE

opened a number of bank accounts for his businesses, including one under the name EARL POPE & ASSOCIATES, which was used in the scheme with WALTERS described below. As a participant in WALTERS's scheme, from in or about 1991 to in or about November 2007, and in addition to other proceeds of the scheme POPE received from WALTERS, POPE received \$1,174,204.67 through twenty-one fraudulently obtained District of Columbia property tax refund checks.

13. CONNIE LORRAINE ALEXANDER (hereinafter "ALEXANDER") lived in Bowie, Maryland, and worked in the District of Columbia as a technical support specialist for a labor organization. ALEXANDER met WALTERS in or about 1992, when ALEXANDER was working in Prince George's County, Maryland as a dealer at a volunteer fire department's "Casino Nights" and WALTERS came to gamble. WALTERS and ALEXANDER became close friends. In or about 2007, ALEXANDER created a corporation called AURORA R.E. ENTERPRISES that was used in the scheme with WALTERS described below. As a participant in WALTERS's scheme, from in or about 1998 to in or about November 2007, and in addition to other proceeds of the scheme ALEXANDER received from WALTERS, ALEXANDER received \$2,209,672.98 through thirteen fraudulently obtained District of Columbia property tax refund checks.

14. WALTER ROBERT EDWARD JONES, JUNIOR (hereinafter "JONES") lived in Essex, Maryland. Beginning in or about 1994, JONES was employed by NationsBank, which became Bank of America (hereinafter "BOA"). JONES worked as a banking center service manager and assistant manager at BOA branches in the District of Columbia and Maryland. JONES was a participant in WALTERS's scheme from in or about 2000 to in or about November 2007. As of on or about February 2, 2007, the date he was fired by BOA, JONES had assisted WALTERS in laundering the proceeds of the scheme by depositing or cashing \$17,941,817.30 in fraudulently

obtained District of Columbia property refund checks. JONES allowed WALTERS and her co-conspirators to deposit fraudulently obtained District of Columbia property tax refund checks at BOA even when the accounts did not match the payee names on the refund checks.

15. RICHARD JUDE WALTERS (hereinafter “RICHARD WALTERS”) lived in Bowie, Maryland. RICHARD WALTERS is WALTERS’s younger brother. RICHARD WALTERS had a plumbing business, HELMET’S PLUMBING & HEATING COMPANY (hereinafter “HELMET’S PLUMBING”), that was used to further the scheme with WALTERS described below. As a participant in WALTERS’s scheme, from in or about October 2000 to in or about November 2007, and in addition to other proceeds of the scheme RICHARD WALTERS received from WALTERS, RICHARD WALTERS received \$5,668,880.50 through eighteen fraudulently obtained District of Columbia property tax refund checks.

16. JAYRECE ELAINE TURNBULL (hereinafter “TURNBULL”) lived in Bowie, Maryland. TURNBULL was WALTERS’s niece. TURNBULL created several business entities, including FIRST AMERICAN HOME, CHAPA INTERIORS, and LEGNA HOME SERVICES, a home cleaning service. The primary purpose of these businesses was to further the scheme with WALTERS, as described below. As a participant in WALTERS’s scheme, from in or about 2001 to in or about November 2007, and in addition to other proceeds of the scheme TURNBULL received from WALTERS, TURNBULL received \$23,996,595.54 through eighty fraudulently obtained District of Columbia property tax refund checks.

17. RICARDO RUIZ WALTERS (hereinafter “RICARDO WALTERS”) lived in the District of Columbia and Fort Washington, Maryland. RICARDO WALTERS was WALTERS’s nephew. In or about 1992, when he was eighteen years of age, RICARDO WALTERS came to the

continental United States from the United States Virgin Islands and lived with WALTERS and WALTERS's sister in an apartment building near the Waterside Mall, in Southwest Washington, D.C. WALTERS sent her nephew to POPE's salon, Head To Toe, for haircuts. Over time, POPE became a role model and mentor to RICARDO WALTERS. RICARDO WALTERS owned a home cleaning business called PROVIDENT HOME SERVICES that was used in the scheme with WALTERS described below. As a participant in WALTERS's scheme, from no later than in or about March 2006 to in or about November 2007, and in addition to other proceeds of the scheme RICARDO WALTERS received from WALTERS, RICARDO WALTERS received \$4,205,319.07 through ten fraudulently obtained District of Columbia property tax refund checks.

18. MARILYN HAEJIN YOON (hereinafter "YOON") lived in Derwood, Maryland. YOON met WALTERS in or about 2000, when YOON was selling Louis Vuitton merchandise in Tysons Corner, Virginia. WALTERS regularly used YOON as her personal shopper at Neiman Marcus, and WALTERS and YOON became friends. YOON was paid on a commission basis and directly benefitted from WALTERS's purchases. As a participant in WALTERS's scheme, in or about 2007, and in addition to other proceeds of the scheme YOON received from WALTERS, YOON received two fraudulently obtained District of Columbia property tax refund checks totaling \$758,940.00. She had one of those checks, in the amount of \$275,000.00, deposited.

19. Individual Seven is a relative of YOON. Individual Seven owned a company, Corporation Two. YOON used Corporation Two's bank account in the scheme with WALTERS.

PROPERTY TAXES IN THE DISTRICT OF COLUMBIA

20. OTR is part of the Office of the Chief Financial Officer. OTR administers and enforces the District of Columbia's tax laws, collects revenues, distributes property tax refunds, and records deeds and other written instruments affecting interests in real or personal property.

21. The District of Columbia annually receives in excess of \$10,000.00 under federal programs involving grants, contracts, subsidies, loans, guarantees, and other forms of assistance.

22. Washington, D.C., which comprises roughly 61.4 square miles of land area, is organized into various parcels called squares. Generally speaking, each city block is one square. Thus, for the portion of the District that is criss-crossed by numbered and lettered streets, one square represents the area between two adjacent numbered streets and two adjacent lettered streets. For example, square 531 is in Northwest and is bounded by Third and Fourth Streets, and E and F Streets. Period maps demonstrate that this block has been square 531 since in or about 1792.

23. Within each square, the block may be divided into various parcels called lots. For example, the Verizon Center, located at 641 F Street, NW, is at Lot 47 of Square 455. The Washington Shakespeare Theatre Company's Sidney Harman Hall, which is located across the street from the Verizon Center, at 610 F Street, NW, is at Lot 829 of Square 456.

24. There are three classes of real property in the District of Columbia. Class I comprises residential real property, including multifamily units. Class II comprises commercial and industrial real property, including hotels and motels. Class III comprises vacant and abandoned real property.

25. Class I properties are taxed at the rate of \$.85 on each \$100 of assessed value. Class II properties are taxed at the rate of \$1.85 on each \$100 of assessed value. With certain exceptions, Class III properties are taxed at the rate of \$5.00 on each \$100 of assessed value.

26. The OTR Assessment Division has assessors who are responsible for estimating the market value of each property in the District on an annual basis. The estimated market value of a property is the most probable price a buyer would pay a willing seller on the open market.

27. The Assessment Division notifies taxpayers of a property's assessment on or before March 1 of each year. If a taxpayer disagrees with the assessment, the taxpayer must appeal by April 1. The appeal process has three levels. First, the taxpayer may seek relief from an assessor or file a written appeal to the Assessment Division. Second, if the Assessment Division does not change the assessment, the taxpayer may appeal to the Board of Real Property Assessment and Appeals (hereinafter "BRPAA"). Third, if the taxpayer is not satisfied with the BRPAA's decision, the taxpayer may challenge the assessment in the District of Columbia Superior Court Tax Division.

28. If a taxpayer does not pay taxes owed on a property for over a year, the District of Columbia may seek to sell the tax liability by sending the taxpayer a final delinquency notice and publishing its intent to place the property up for tax sale auction. At the auction, bidders seek the right to purchase the outstanding tax liability. The winning bidder must wait six months before filing an action in the District of Columbia Superior Court to foreclose on the property. The taxpayer may retain ownership of the property by paying all outstanding taxes and costs before a judge issues a foreclosure order; this process is called redemption. Most tax sale properties are ultimately redeemed by the original owner.

29. There are two primary rationales for a property tax refund: the assessment was reduced or property taxes were paid by both the owner of the property and the mortgage company.

30. The median District of Columbia property tax refund check in 2007 was less than \$6,000.00. Six-figure property tax refund checks are uncommon but not inconceivable. For

example, the owner of a Class II commercial office building assessed at \$100,000,000.00 would owe \$1,850,000.00 in annual District of Columbia property taxes.¹ If the owner won a ten percent reduction in assessment in the Superior Court Tax Division, there would be a refund of \$185,000.00. Moreover, if a year elapsed between the filing of the challenge and the date the check was issued, the property owner would be entitled to \$11,100.00 in interest, for a total refund of \$196,100.00.

31. To keep track of property tax refunds, OTR assigns each individual property tax refund a specific number. That number, in the nomenclature of OTR, is called the VRRE number.

32. During portions of the scheme, OTR had two primary programs for processing property tax refunds: the System of Account and Reporting (hereinafter “SOAR”) and the Integrated Tax System (hereinafter “ITS”).²

33. Property tax refunds processed through SOAR required two forms and supporting documentation. Ordinarily, an RPTAAU staff member prepared a handwritten Refund Research Form that listed the following data: (1) square and lot numbers of the property or properties; (2) the tax due for each year; (3) the amount and date of taxes paid; and (4) the refund amount. The staff member attached supporting documentation, such as court orders from the Superior Court Tax Division, cancelled checks, and letters requesting a refund. The staff member signed the Refund Research Form and then brought it to a manager for verification. If the manager verified the data, the staff member prepared the second form, the SOAR Revenue Refund Voucher. This form was available on RPTAAU staff members’ computers. Staff members entered on the form (1) the payee’s name; (2) mailing information, including whether the check should be mailed or held for

¹ In or about 2007, 260 properties were assessed at \$100,000,000.00 or more in value.

² The majority of the fraudulent property tax refund vouchers created by WALTERS were processed through SOAR.

pickup; (3) a description of the reason for the refund; (4) the fiscal year in which the refund would be paid; and (5) the refund amount. When staff members opened the word-processing program that generated the SOAR Revenue Refund Voucher, the program assigned the voucher a four-digit VRRE number. When staff members completed the SOAR Revenue Refund Voucher, the voucher was dated and authorized by the manager of the RPTAAU, who returned the paperwork to the RPTAAU staff member. The staff member made copies of the voucher, the Refund Research Form, and the supporting documentation. One packet of materials—consisting of the original Refund Research Form and the supporting documentation—was kept in the RPTAAU unit. Another packet of the materials—consisting of a copy of the supporting documentation and Refund Research Form—was attached to the original SOAR voucher and sent to the Revenue Accounting Administration (hereinafter “Revenue Accounting”), where an employee in Revenue Accounting entered the information from the SOAR voucher into the OTR database for payment.

34. Property tax refunds processed through SOAR had to be signed or initialed by four OTR employees: (1) the RPTAAU employee who prepared the Refund Research Form signed the form and generally prepared the SOAR Revenue Refund Voucher form;³ (2) the RPTAAU manager, who was charged with verifying the Refund Research Form and approving the voucher, signed the Refund Research Form and the SOAR Revenue Refund Voucher; (3) an employee in Revenue Accounting who entered the data on the SOAR Revenue Refund Voucher form into the computer systems initialed the form; and (4) a Revenue Accounting manager, who verified that the data were entered correctly, also initialed the form. Under the practice followed during her scheme, only the

³ The name of the employee who generated a SOAR Revenue Refund Voucher is generally typed on the form, but there is no safeguard to prevent someone from typing in another employee’s name.

first two employees' signatures related to actual review and approval of the tax refund request; the latter two signatures related only entry and verification of data.

35. At relevant times, OTR policy required the Director of Real Property Tax Administration (who supervises the manager of RPTAAU) to approve refunds of \$100,000.00 or more and required the Deputy Chief Financial Officer to approve refunds of \$250,000.00 or more. The approval amounts increased over time, but property tax vouchers were often not reviewed (or were not reviewed with any degree of care) by the officials made responsible for approving large refunds under OTR policy.

36. After Revenue Accounting entered the data, a check was generally created within fourteen days. Checks were mailed to the name and address of the payee unless an RPTAAU employee typed "hold for pickup" on the SOAR Revenue Refund Voucher form or used a code—50—on the form that indicated to Revenue Accounting that the check should held for pickup.

37. RPTAAU employees could hasten payment of a property tax refund voucher by sending a memorandum to Revenue Accounting requesting that a particular voucher be expedited. If the request was granted, the check was processed in one to three days.

38. OTR also processed property tax refunds through ITS. Refunds processed through ITS did not go through Revenue Accounting. Rather, a member of RPTAAU would access ITS, determine whether a refund was due based on data already in ITS, and essentially instruct ITS to issue a refund to the taxpayer who owned the particular property. Unlike SOAR returns, RPTAAU employees could not have ITS refunds held for pickup; instead, all ITS checks were mailed directly to the name and address in ITS that were associated with the particular property.

THE ROOTS OF THE SCHEME

39. In or about December 1981, WALTERS began working for the District of Columbia Department of Finance and Revenue (which later became OTR) as a temporary employee. WALTERS's first responsibilities involved work on records for the annual tax sales. WALTERS also was trained in processing property tax adjustments and refunds.

40. In or about 1984, WALTERS became a full-time employee.

41. In or about the mid-1980s, WALTERS became aware of improprieties in her division. Taxpayers who had not timely paid their property tax bills owed extra charges in the form of interest and penalties. Employees had the discretion to waive such charges, which was a significant benefit to financial institutions that routinely made property tax payments on behalf of multiple properties. WALTERS noticed that employees who waived interest and penalties for such repeat players or for individual taxpayers with large tax debts received fruit baskets, gifts, and cash during the holidays. Holiday cards often contained cash in amounts ranging from \$150 to \$300. WALTERS also heard employees and taxpayers bargaining over the amount of money it would take to waive interest and penalties. For example, employees told taxpayers it would be possible to waive the extra charges, but that it would cost a certain amount; given that the amount was much less than the extra charges, the taxpayers often agreed to pay and did so by handing employees envelopes containing cash.

42. Participant Five showed WALTERS how to remove interest and penalty charges and how to get taxpayers to give things of value in return for waiving the extra charges.

43. Participant Five also showed WALTERS another method of obtaining funds. Participant Five pulled checks written to deceased taxpayers and returned to the government, cashed the checks at a check cashing store, and retained the proceeds. At Participant Five's direction,

WALTERS pulled returned checks from the mail and gave them to Participant Five. Participant Five shared proceeds from the stolen checks with WALTERS.

44. Most significantly, WALTERS learned that Participant Five and others were creating fraudulent property tax refunds when she recognized the name of one of Participant Five's friends on a property tax refund voucher. WALTERS confronted Participant Five, and Participant Five agreed to show WALTERS how to create fraudulent refunds. The process was relatively easy at that time, given that property tax records were on microfiche or handwritten in ledger books.

45. The basic scheme learned by WALTERS involved several steps. First, WALTERS created a "case," or package of materials designed to show that a taxpayer was entitled to a credit. Second, WALTERS created a fraudulent refund request. She did this by (1) cutting the letterhead off a genuine letter from an attorney or mortgage company and pasting it onto a letter she wrote seeking a refund in the name of the person she wanted to receive the refund, (2) photocopying the forged letter multiple times to make it appear genuine, and (3) attaching cancelled property tax payment checks from the mortgage company or attorney. Third, WALTERS prepared a voucher in triplicate, typing in the name of the attorney or mortgage company. Fourth, after the voucher was approved, WALTERS erased the mortgage company or attorney name on each of the three triplicate sheets and wrote in the name of the individual to whom she was giving the refund. Fifth, WALTERS picked up the check and delivered it to the person she wanted to cash or deposit it.⁴

46. Before embarking on her own scheme, WALTERS created a small number of fraudulent property tax refund cases for Participant Five and for Participant Five's friends.

⁴ Although the process changed over time, particularly with increased use of computer technology at OTR, the basic method remained largely the same.

THE SCHEME

47. Having learned from Participant Five how successfully to create false and fraudulent property tax refunds, WALTERS decided to use that knowledge to embezzle District of Columbia funds for herself and for friends and family.

48. Between no later than in or about June 1989 and continuing through in or about November 2007, WALTERS stole \$48,115,451.09 from the District of Columbia by using her experience and her knowledge of the property tax refund process to prepare 236 fraudulent property tax refund vouchers and shepherd such vouchers through the approval process.

49. WALTERS used her knowledge of OTR policies to exploit weaknesses in the review process for vouchers. For example, WALTERS knew that policies requiring high level management approval for refunds over \$100,000.00, \$250,000.00, and even \$500,000.00 were not being followed. WALTERS also knew that vouchers would be less likely to face scrutiny if they bore the names of payees that frequently received property tax refunds, particularly given that the District of Columbia on occasion issued large property tax refund checks to owners of large commercial office buildings who successfully appealed their property tax assessments. WALTERS attempted to make her fraudulent property tax vouchers appear legitimate by attaching cancelled property tax payment checks from actual property owners and asserting that the taxpayers on her fraudulent vouchers were owed the amounts on the cancelled property tax checks.

50. It was WALTERS's responsibility as the manager of RPTAAU to review and approve property tax refund voucher applications and ensure that only those taxpayers who were owed refunds received them and that they received only the amounts to which they were entitled. Instead, WALTERS used her public office to enrich herself and her co-conspirators.

51. When WALTERS contemplated creating a fraudulent voucher, and for the purpose of executing her scheme, WALTERS called one of her co-conspirators from OTR or from her cellular telephone while in the District of Columbia. WALTERS spoke in code, telling her co-conspirators that she was thinking of “doing another one.” WALTERS then secured the fraudulently obtained property tax refund checks and gave them to co-conspirators to deposit or cash and then provide WALTERS her share of the proceeds. WALTERS alerted her co-conspirators that a fraudulent property tax refund check was coming by calling them from OTR or from her cellular telephone while in the District of Columbia. WALTERS again used code, telling her co-conspirators that “the package was ready.” Most of WALTERS’s co-conspirators lived in Maryland during at least part of the scheme. Thus, the vast majority of these calls in furtherance of the scheme involved communications in interstate commerce over the wires. WALTERS also routinely used phones in the District of Columbia to call JONES at various BOA branches in Maryland to let JONES know that a co-conspirator would be bringing a check for him to deposit or cash or to instruct him to move funds among or between her accounts.

52. The breadth and scope of the scheme significantly increased over time.

53. At the beginning of the scheme, WALTERS prepared individual fraudulent property tax refund vouchers that were in amounts just over \$4,000.00. By the end of the scheme, in or about 2007, WALTERS prepared a fraudulent property tax voucher that was in an amount that exceeded \$500,000.00. As a consequence, the amount WALTERS stole each year also generally increased, from \$31,734.57 in or about 1989 to a high of \$8,641,750.34 in or about 2004.

54. WALTERS did not want to raise suspicions among co-workers or supervisors. She never put a fraudulent voucher in her own name, and she never deposited a fraudulently obtained

refund check into an account in her name. WALTERS used other people who agreed to lend their names as payees and who were willing to deposit checks into their personal and corporate accounts.

55. At the beginning of the scheme, WALTERS generally used individuals' names as payees for the fraudulently obtained refund checks. WALTERS determined that she could more easily deposit larger fraudulently obtained checks into corporate accounts than into personal accounts. Accordingly, WALTERS began to use corporate accounts opened by her co-conspirators for real or sham companies. WALTERS used the company names as payees for the checks.

56. At the beginning of the scheme, WALTERS used her friends as co-conspirators. As the scheme continued, WALTERS added her family members as co-conspirators.

57. WALTERS continued to distribute proceeds of her scheme to co-conspirators even if they were not actively depositing fraudulently obtained property tax refund checks.

58. WALTERS was aided in her ability to deposit the fraudulently obtained property tax refund checks and distribute the proceeds of her scheme among and between the conspirators by bringing a BOA employee into the conspiracy.

59. When her methods for successfully creating fraudulent property tax vouchers appeared to be in jeopardy because of inquiries from a bank, in or about the summer of 2007, WALTERS took active steps to avoid being apprehended. After the bank questioned OTR about the legitimacy of two property tax refund checks, WALTERS forged an OTR memorandum declaring that the checks were legitimate, had a co-conspirator scan documents to help defraud the bank, and forged a letter from OTR to mislead the bank.

60. WALTERS used proceeds of her fraudulent scheme to finance a lavish lifestyle. WALTERS shopped at high-end stores and purchased expensive items, including designer clothes,

purses, fur coats, and shoes. WALTERS also purchased large amounts of jewelry. WALTERS spent a significant portion of the proceeds of her scheme on gambling trips to Las Vegas, Nevada, and Atlantic City, New Jersey, among other places. Finally, WALTERS gave large amounts of the proceeds to friends, family members, and co-workers at OTR.

61. Finally, WALTERS did not report all of her income on her federal and District of Columbia tax returns between for the tax years 2002 through 2007. Thus, WALTERS had a substantial unpaid tax due and owing in each of those years.

1989

62. WALTERS and GROOMS grew to be friends after meeting in or about the late 1980s as students in the same accounting class at the University of the District of Columbia.

63. In or about 1989, WALTERS informed GROOMS that she was able to obtain fraudulent District of Columbia property tax refund checks and inquired whether GROOMS knew anyone who could cash them. GROOMS agreed to participate in the scheme with WALTERS. GROOMS also brought two friends, Participant Three and Participant Four, into the scheme.

64. In or about 1989, WALTERS used her position as a government employee to create false property tax refund vouchers for GROOMS, Participant Three, and Participant Four, and cause the issuance of fraudulent District of Columbia checks in their names. Both the vouchers and the checks were marked “Hold for Pick Up” so that the checks would not be mailed. WALTERS delivered the fraudulent District of Columbia checks personally to GROOMS. GROOMS, Participant Three, and Participant Four cashed the checks—sometimes using a specific teller at a Riggs Bank branch in Washington, D.C.—and then split the remaining proceeds with WALTERS.

65. WALTERS was aware that her unit had monthly and annual audits.⁵ To avoid raising suspicions, WALTERS often varied the name of the payee in slight but significant ways.

66. In or about 1989, WALTERS and GROOMS embezzled a total of \$8,908.66 from the District of Columbia through two fraudulently obtained property tax refunds:

Date	Voucher	Check No.	Payee	Amount
6/27/89	VRRE 9579	099034	ALETHIA GROOMS	\$4,060.00
8/1/89	VRRE 9670	019944	ALETHIA GROOMS	\$4,848.66

67. In or about 1989, WALTERS and GROOMS's friend, Participant Four, embezzled a total of \$19,118.64 from the District of Columbia through three fraudulently obtained property tax refunds:

Date	Voucher	Check No.	Payee	Amount
8/16/89	VRRE 9715	030866	Participant Four	\$9,678.63
8/16/89	VRRE 9719	030867	Participant Four	\$4,525.33
10/5/89	VRRE 9845	074152	Participant Four ⁶	\$4,914.68

68. In or about 1989, WALTERS and GROOMS's friend, Participant Three, embezzled a total of \$3,707.27 from the District of Columbia through one fraudulently obtained property tax refund:

⁵ On at least one occasion, one of WALTERS's fraudulent vouchers was chosen for review by an outside auditor. The fraud was not discovered, and the scheme continued.

⁶ WALTERS used Participant Four's full name on the first two refunds; for the third check, WALTERS abbreviated Participant Four's first and middle names.

Date	Voucher	Check No.	Payee	Amount
12/13/89	VRRE 1003	116031	Participant Three	\$3,707.27

69. In sum, in or about 1989, WALTERS created at least six fraudulent property tax refund vouchers. As a result, in or about 1989, WALTERS and her co-conspirators embezzled at least \$31,734.57 from the District of Columbia through their scheme.

1990

70. In or about the spring of 1990, WALTERS spoke to PATRICIA STEVEN about WALTERS's ability to embezzle District of Columbia property tax refund checks. WALTERS explained the scheme, including how PATRICIA STEVEN would obtain checks in her name or those related to her and why WALTERS believed they would not be apprehended.⁷

71. PATRICIA STEVEN agreed to participate in WALTERS's scheme. As a result, in or about 1990, WALTERS and PATRICIA STEVEN embezzled a total of \$31,068.33 from the District of Columbia through seven fraudulently obtained property tax refunds:

Date	Voucher	Check No.	Payee	Amount
5/14/90	VRRE 1575	233942	PATRICIA FLOOD ⁸	\$4,359.79
6/18/90	VRRE 1648	264975	Individual Six ⁹	\$4,739.26
7/23/90	VRRE 1735	291660	PAT A FLOOD	\$4,719.70
7/23/90	VRRE 1743	291668	MRS ROBERT R. STEVENS [sic]	\$4,844.94
9/11/90	VRRE 1805	323987	P A STEVENS [sic]	\$4,219.30

⁷ WALTERS believed that property tax refund records were destroyed after three years.

⁸ PATRICIA STEVEN's maiden name was FLOOD.

⁹ Individual Six is a close relative of PATRICIA STEVEN and ROBERT STEVEN.

11/19/90	VRRE 1928	370421	Individual Six ¹⁰	\$4,056.00
12/14/90	VRRE 2241	385245	P. ANN FLOOD	\$4,129.34

72. In or about 1990, WALTERS and GROOMS embezzled a total of \$13,650.59 from the District of Columbia through three fraudulently obtained property tax refunds:

Date	Voucher	Check No.	Payee	Amount
1/10/90	VRRE 1119	131938	ALETHIA O. GROOMS	\$4,628.40
6/13/90	VRRE 1653	264980	A.O. GROMES [sic]	\$4,236.44
12/11/90	VRRE 2232	385241	Individual Five	\$4,785.75

73. In or about 1990, WALTERS and GROOMS's friend, Participant Four, embezzled \$2,297.87 from the District of Columbia through one fraudulently obtained property tax refund:

Date	Voucher	Check No.	Payee	Amount
8/14/90	VRRE 1790	311542	Participant Four	\$2,297.87

74. In sum, in or about 1990, WALTERS created at least eleven fraudulent property tax refunds. As a result, in or about 1990, WALTERS and her co-conspirators embezzled at least \$47,016.79 from the District of Columbia through their scheme.

1991

75. In or about 1991, WALTERS and GROOMS embezzled a total of \$13,049.56 from the District of Columbia through three fraudulently obtained property tax refunds:

¹⁰ For the first check, WALTERS used initials for Individual Six's first and middle names; for the second, she used an initial for the first name and spelled out the full middle name.

Date	Voucher	Check No.	Payee	Amount
2/4/91	VRRE 2784	409003	OLIVIA GROOMS	\$4,932.30
12/17/91	VRRE 4051	622855	A OILIVIA [sic] GROOMES [sic]	\$4,602.75
12/17/91	VRRE 4050	622854	ALETHIA MACK	\$3,514.51

76. In or about 1991, WALTERS and GROOMS's friend, Participant Four, embezzled \$4,794.80 from the District of Columbia through one fraudulently obtained property tax refund:

Date	Voucher	Check No.	Payee	Amount
6/15/91	VRRE 3508	534431	Participant Four ¹¹	\$4,794.80

77. WALTERS wanted to increase the amounts of the fraudulent property tax refunds she could create, and WALTERS saw an advantage to adding co-conspirators with business accounts: WALTERS believed that fewer suspicions would be raised when large checks were deposited into business accounts than into individuals' personal accounts.

78. POPE, as the owner of Head to Toe Salon, had business accounts.

79. Thus, in or about the months leading up to May 1991, when POPE shared with WALTERS his concerns about rent increases and other business expenses, WALTERS told POPE about a method she had for embezzling funds from the District of Columbia government.

80. WALTERS explained to POPE that she could get District of Columbia property tax refund checks through her work at OTR. POPE agreed to participate in WALTERS's scheme.

81. Accordingly, in or about May 1991, POPE began receiving fraudulently obtained District of Columbia property refunds checks from WALTERS. POPE typically deposited the

¹¹ WALTERS varied the spelling of Participant Four's first name on this voucher.

checks into his accounts at the Waterside Mall branch of the National Bank of Washington (a predecessor of SunTrust); at WALTERS’s direction, POPE let the money stay in his account for a period of time to avoid suspicions; POPE withdrew cash to provide WALTERS her share of the proceeds; and POPE typically withdrew less than \$10,000.00 at one time to avoid raising suspicions.

82. As she had done previously with other co-conspirators, WALTERS varied the spelling of the payee name on the District of Columbia property tax refund checks given to POPE to avoid raising any suspicions that the same payee was receiving multiple property tax refunds in the same year or across a number of years. WALTERS used the names of POPE’s businesses; WALTERS also used sham business names that sufficiently matched account names held by POPE for POPE to be able to deposit the checks into his accounts.

83. By bringing POPE into the scheme, and being able to use his corporate account, WALTERS was able to increase the amounts of the fraudulent property tax checks she could create. Thus, for the first sixteen fraudulent property tax refunds created by WALTERS, WALTERS used individuals’ names on the payee line of the checks. Those checks ranged in value from \$2,297.87 to \$9,678.68. The first fraudulent property tax refund check for POPE—in the amount of \$37,639.00 to “Earl Pope & Associates Inc”—was nearly four times larger than the next largest check WALTERS had created before bringing POPE into the scheme.

84. In or about 1991, WALTERS and POPE embezzled a total of \$60,972.52 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payee	Amount
5/3/91	VRRE 3281	483154	EARL POPE & ASSOCIATES INC	\$37,639.00
9/16/91	VRRE 3561	586512	EARL POPE AND ASSOCIATES INC	\$23,333.52

85. Having successfully used POPE's corporate account to increase the amounts of the fraudulent property tax refunds she was creating, WALTERS began to use a corporate account, BELLARMINE, that was controlled by PATRICIA STEVEN and ROBERT STEVEN.

86. In or about 1991, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$58,250.41 from the District of Columbia through one fraudulent property tax refund using BELLARMINE:

Date	Voucher	Check No.	Payee	Amount
10/22/91	VRRE 3672	060144	RIVERSIDE/BELLARIME [sic]	\$58,250.41

87. WALTERS, PATRICIA STEVEN, and ROBERT STEVEN also embezzled a total of \$14,791.01 from the District of Columbia in or about 1991 by putting a fraudulent property tax refund check in the name of a sham corporation based on PATRICIA STEVEN's maiden name:

Date	Voucher	Check No.	Payee	Amount
7/9/91	VRRE 3449	523164	FLOOD AND ASSOCIATES	\$14,791.01

88. Finally, in or about 1991, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN continued embezzling additional funds by putting checks in the latter two individuals' names. Thus, in or about 1991, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$8,294.78 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payee	Amount
2/23/91	VRRE 862	427078	R.O.& P.A. STEPHENS [sic]	\$4,735.50
12/4/91	VRRE 4022	620352	PAT STEPHENS [sic]	\$3,559.28

89. In sum, in or about 1991, WALTERS created at least ten fraudulent property tax refunds. As a result, in or about 1991, WALTERS and her co-conspirators embezzled at least \$160,153.08 from the District of Columbia through their scheme.

1992

90. In or about 1992, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$4,711.29 from the District of Columbia by putting a fraudulent property tax refund check in PATRICIA STEVEN's maiden name:

Date	Voucher	Check No.	Payee	Amount
2/27/92	VRRE 4864	678059	PATRICIA FLOOD	\$4,711.29

91. In sum, in or about 1991, WALTERS created at least one fraudulent property tax refund. As a result, in or about 1992, WALTERS and her co-conspirators embezzled at least \$4,711.29 from the District of Columbia through their scheme.

1993

92. Having seen that she could steal larger amounts with co-conspirators' corporations as the payees for the fraudulent property tax refunds, WALTERS largely stopped using individuals' names as payees without adding a sham or genuine corporate payee as an additional payee.

93. In or about 1993, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$174,212.51 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payee	Amount
6/8/93	VRRE 6913	195742	BELLARMINE DESIGNS	\$62,478.20
7/20/93	VRRE 8016	231045	BELLAMINE [sic] ASSOCIATES	\$58,250.41
10/1/93	VRRE 7417	283624	RIVERSIDE- BELLARMINE & ASSOCS	\$53,483.90

94. In or about 1993, WALTERS and POPE embezzled a total of \$72,088.64 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payee	Amount
7/20/93	VRRE 8010	231044	WALKER-POPE & ASSOCS	\$28,656.01
10/1/93	VRRE 7699	295081	POPE AND ASSOCIATES	\$43,432.63

95. In sum, in or about 1993, WALTERS created at least five fraudulent property tax refunds. As a result, in or about 1993, WALTERS and her co-conspirators embezzled at least \$246,301.15 from the District of Columbia through their scheme.

1994

96. In or about 1994, having successfully operated the scheme for nearly five years, WALTERS continued to increase the size and volume of the fraudulent property tax refunds.

97. Thus, in or about 1994, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$815,205.43 from the District of Columbia through twelve fraudulent property tax refunds:

Date	Voucher	Check No.	Payee	Amount
1/11/94	VRRE 8410	312565	BELLAMARMINE [sic] INC	\$53,784.02
1/31/94	VRRE 7820	323619	RIVERSIDE- BELLARMINE & ASSOC	\$84,959.80
3/21/94	VRRE 9411	356113	RIVERSIDE- BELLARMINE & ASSOC	\$72,990.00
4/8/94	VRRE 9417	372254	BELLARMINE & ASSOCIATES INC.	\$52,784.66
4/28/94	VRRE 0014	420794	RIVERSIDE- BELLARMINE INC	\$66,560.00
5/3/94	VRRE 0722	399176	RIVERSIDE- BELLARMINE & ASSOCS	\$69,843.94
5/20/94	VRRE 0010	407827	BELLARMINE & ASSOCS, INC.	\$68,495.84
7/8/94	VRRE 0021	460772	BELLARMINE, INC AND ASSOCS	\$64,782.09
7/8/94	VRRE 0017	433514	RIVERSIDE- BELLARMINE & ASSOCS	\$77,990.43
9/1/94	VRRE 0012	455277	RIVERSIDE- BELLARMINE & ASSOCS	\$72,548.54
11/2/94	VRRE 0018	404689	BELLARMINE & ASSOCS INC	\$72,340.12
11/29/94	VRRE 0024	527541	BELLARMINE- RIVERSIDE & ASSOC	\$58,125.99

98. In or about 1994, WALTERS and POPE embezzled a total of \$422,219.69 from the District of Columbia through eight fraudulent property tax refunds:

Date	Voucher No.	Check No.	Payee	Amount
1/31/94	VRRE 7821	323620	WALKER-POPE INC	\$52,963.00
3/2/94	VRRE 8905	349977	POPE AND ASSOCS INC	\$46,880.00
4/28/94	VRRE 0015	420795	POPE AND ASSOCIATES, INC	\$58,020.90
5/3/94	VRRE 0721	399175	WALKER-POPE ASSOCIATES	\$48,900.00
7/8/94	VRRE 0022	459922	POPE-WALKER AND ASSOCS	\$48,321.79
9/1/94	VRRE 0011	455310	WALKER-POPE & ASSCOS [sic] INC	\$55,820.69
11/2/94	VRRE 0019	404690	WALKER-POPE & ASSOCS	\$58,670.98
11/29/94	VRRE 0023	527540	POPE AND ASSOCIATES, INC	\$52,642.33

99. On or about the following dates, WALTERS created one fraudulent voucher for POPE and at least one fraudulent voucher for PATRICIA STEVEN and ROBERT STEVEN: January 31, 1994; April 28, 1994; May 3, 1994; July 8, 1994; September 1, 1994; November 2, 1994; and November 29, 1994.

100. In sum, in or about 1994, WALTERS created at least twenty fraudulent property tax refunds. As a result, in or about 1994, WALTERS and her co-conspirators embezzled at least \$1,237,425.12 from the District of Columbia through their scheme.

1995

101. In or about 1995, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$1,117,034.94 from the District of Columbia through fourteen fraudulent property tax refunds:

Date	Voucher	Check No.	Payee	Amount
1/24/95	VRRE 2029	558027	RIVERSIDE– BELLARMINE INC	\$68,320.23
2/23/95	VRRE 2031	570579	STEVENS [sic] MANAGEMENT INC	\$66,509.18
3/31/95	VRRE 2034	575890	BELLARMINE & ASSOCIATES, INC	\$76,045.90
5/11/95	VRRE 2038	593585	STEVENS [sic]-OCHS ¹² AND ASSOCS	\$74,002.50
5/15/95	VRRE 3803	609737	BELLARMINE & ASSOCS INC	\$82,674.89
5/15/95	VRRE 3800	609175	STEVEN & ASSOCS. INC	\$78,941.01
6/15/95	VRRE 3004	622979	BELLARMINE & ASSOCIATES INC	\$89,673.24
6/15/95	VRRE 3001	622981	STEVENS [sic] AND ASSOCIATES INC	\$76,900.90
7/24/95	VRRE 3015	625442	FLOOD-STEVEN & ASSOCS INC	\$84,977.09
8/24/95	VRRE 3018	646546	RIVERSIDE- BELLARMINE & ASSOC I	\$87,983.23
8/28/95	VRRE 3012	647822	STEVEN WALKER JONES ASSOCS	\$63,090.23
11/17/95	VRRE 3024	018211	RIVERSIDE– BELLARMINE & ASSOC’	\$88,906.23

¹² ROBERT STEVEN was given the name Robert Ochs at birth.

12/1/95	VRRE 3028	040358	STEVEN & ASSOC INC	\$86,423.86
12/7/95	VRRE 1101	056810	STEVEN-FLOOD ASSOCS INC	\$92,586.45

102. In or about 1995, WALTERS and POPE embezzled a total of \$306,202.65 from the District of Columbia through five fraudulent property tax refunds:

Date	Voucher No.	Check No.	Payee	Amount
1/24/95	VRRE 2028	558029	WALKER-POPE & ASSOC INC	\$46,874.98
3/31/95	VRRE 2030	575892	POPE AND ASSOCIATES, INC	\$63,729.89
5/15/95	VRRE 3811	609741	POPE AND ASSOCIATES	\$57,929.09
6/15/95	VRRE 3003	622982	WALKER-POPE & ASSOCIATES INC	\$63,375.67
8/28/95	VRRE 3011	647987	POPE MANAGEMENT INC	\$74,293.02

103. In or about 1995, WALTERS continued her pattern of creating multiple fraudulent vouchers on the same day. Thus, on or about the following dates, WALTERS created one fraudulent voucher for POPE and at least one fraudulent voucher for PATRICIA STEVEN and ROBERT STEVEN: January 24, 1995; March 31, 1995; May 15, 1995 (one for POPE and two for PATRICIA STEVEN and ROBERT STEVEN); and June 15, 1995 (one for POPE and two for PATRICIA STEVEN and ROBERT STEVEN).

104. In sum, in or about 1995, WALTERS created at least nineteen fraudulent property tax refunds. As a result, in or about 1995, WALTERS and her co-conspirators embezzled at least \$1,423,237.59 from the District of Columbia through their scheme.

1996

105. In or about 1996, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$181,925.25 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payee	Amount
2/22/96	VRRE 1124	064102	FLOOD STEVEN INC ASSOC	\$92,864.83
2/22/96	VRRE 1126	064387	BELLARMINE & ASSOCIATES INC	\$89,060.42

106. In or about 1996, WALTERS and POPE embezzled a total of \$61,499.36 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher No.	Check No.	Payee	Amount
2/2/96	VRRE 1125	064393	POPE-WALKER INC	\$61,499.36

107. In sum, in or about 1996, WALTERS created at least three fraudulent property tax refunds. As a result, in or about 1996, WALTERS and her co-conspirators embezzled at least \$243,424.61 from the District of Columbia through their scheme.

1997

108. In or about 1997, WALTERS and her co-conspirators embezzled a total of \$543,423.50 from the District of Columbia through their scheme:

Date	Voucher	Check No.	Payee	Amount
7/10/97	VRRE 6049	277891	STEVEN ASSOCS INC	\$543,423.50

109. The one fraudulent property tax voucher in 1997—for \$543,423.50—was larger than any other fraudulent voucher created by WALTERS during the roughly eighteen years of her scheme.

1998

110. In or about 1998, WALTERS brought ALEXANDER into her scheme. After spending time gambling together, WALTERS and ALEXANDER became close friends and WALTERS began giving ALEXANDER cash gifts, often in amounts of \$5,000 or more.

111. In or about 1998, WALTERS explained to ALEXANDER that she could get District of Columbia property tax refund checks through her work at OTR; that the checks would be in ALEXANDER's name; and that ALEXANDER would deposit the checks and then split the proceeds with WALTERS. ALEXANDER agreed to participate in WALTERS's scheme.

112. In or about 1998, WALTERS and ALEXANDER embezzled a total of \$53,992.14 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher	Check No.	Payees¹³	Amount
12/2/98	VRRE 7420	524243	C. L. Alexander, Inc C/O Charles Camailier [sic], Esq Hold For Pick Up	\$53,992.14

113. The square and lot number combination referenced on VRRE 7420—Square 113, Lot 53—does not exist in District of Columbia property records.

114. In or about 1998, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$221,901.76 from the District of Columbia through one fraudulent property tax refund:

¹³ This column lists names as prepared by WALTERS. On occasion, employees in Revenue Accounting fixed errors when entering the information. The columns herein mark obvious spelling and grammar errors with a “[sic].” Other errors, including extra spaces, are left unnoted.

Date	Voucher	Check No.	Payees	Amount
11/25/98	VRRE 7419	524244	Bellarmine and Associates, Inc C/O Jeff NADEL, Esq HOLD FOR PICKUP	\$221,901.76

115. In or about 1998, WALTERS began using two payee names on checks. One payee name typically, but not always, was associated with an account controlled by a co-conspirator; this made it easier to deposit the fraudulent property tax refund checks. The second payee name was chosen to give the fraudulent property tax refund vouchers the veneer of legitimacy in case they were reviewed at OTR. Thus, for secondary payees, WALTERS often used the names of lawyers and law firms who were known in OTR as routinely practicing before the BRPAA and the District of Columbia Superior Court Tax Division in the area of real property assessment appeals: such litigation could result in large property tax refund checks like those WALTERS was creating. WALTERS also used the names of prominent properties, real estate companies, and other related corporations as secondary payees: it would not appear suspicious for such entities to receive large property tax refund checks.

116. The 1998 voucher created by WALTERS for PATRICIA STEVEN and ROBERT STEVEN—VRRE 7419—used their company, BELLARMINE. The check further stated that it was in care of a secondary payee who was an attorney.

117. In sum, in or about 1998, WALTERS created at least two fraudulent property tax refunds. As a result, in or about 1998, WALTERS and her co-conspirators embezzled at least \$275,893.90 from the District of Columbia through their scheme.

1999

118. In or about 1999, WALTERS and POPE embezzled a total of \$92,779.88 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher No.	Check No.	Payee	Amount
3/25/99	VRRE 7747	575257	WALKER-POPE	\$92,779.88

119. In or about 1999, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$842,945.11 from the District of Columbia through five fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
3/25/99	VRRE 7750	575110	BELLARNINE & ASSOC. C/O AMERICAN REALTY GROUP 4400 MASS AVE, N.W.	\$190,230.00
6/24/99	VRRE 1834	631944	BELLARMINE CORPORATION PREM MALKANI, ESQ 1625 1 MASSACNUE [sic] AVE SUITE #11042 HERNDON, VA 22070	\$113,412.56
6/24/99	VRRE 1846	631945	TALIAFARO, INC R.O. STEPHEN ONE ADVANTAGE WAY NASVILLE [sic], TN 37228	\$122,413.73

8/11/99	VRRE 1924	667935	THE WINKLER COMPANY STEVEN-CAMPBELL ¹⁴ 4900 SEMINARY ROAD #900 ALEXANDRIA, VA 22311	\$187,167.50
10/12/99	VRRE 2090	710412	254 LIMITED PARTNERSHIP STEVEN CAMPBELL 1001 G STREET, N.W. #700W WASHINGTON, DC 20001	\$229,721.32

120. None of the square and lot combinations used by WALTERS on VRRE 7750, VRRE 1834, VRRE 1846, VRRE 1924, or VRRE 2090 existed in District of Columbia property records.

121. In or about 1999, WALTERS and ALEXANDER embezzled a total of \$51,510.16 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher	Check No.	Payees	Amount
3/25/99	VRRE 7748	575259	C. L. ALEXANDER, ETC C/O CENTURY MORTGAGE, INC. 4701 BEE RIDGE ROAD	\$51,510.16

122. WALTERS successfully embezzled the funds through these vouchers even though the payee names on the SOAR Revenue Refund Vouchers contained obvious misspellings and errors such as “NASVILLE.”

¹⁴ The handwritten Refund Research Form attached to VRRE 1924 lists the payee as the “Winkler Company, Attn: R.O. Steven” (emphasis added).

123. In or about 1999, WALTERS also embezzled \$257,287.28 from the District of Columbia by creating another fraudulent property tax voucher, VRRE 2089:

Date	Voucher No.	Check No.	Payee	Amount
10/12/99	VRRE 2089	710405	GREYROCK CAPITAL GROUP, INC DOROTHY INGALLS 201 BROAD STREET STANFORD [sic], CT 06901	\$257,287.28

124. The refund check for VRRE 2089 was not mailed to Connecticut. Instead, WALTERS used a code—50—on the SOAR voucher to ensure that it would be held for pickup. WALTERS used the SOAR system to generate this fraudulent property tax refund voucher. The SOAR voucher itself purported to be a refund for Square 1431, Lot 2003. That square and lot combination does not exist in District of Columbia property records.

125. To provide support for the \$257,287.28 refund sought by VRRE 2089, WALTERS created a phony letterhead from the law firm Proskauer, Rose, Geotz & Mendelsohn LLP on a dot-matrix printer; the resulting letterhead had blurry lines. WALTERS used this forged letterhead to forge a letter dated August 16, 1999, purporting to be from Dorothy M. Ingalls. Ms. Ingalls had been an attorney at Proskauer; but, as of August 16, 1999, she was no longer affiliated with the firm.

126. The letter forged by WALTERS purported to be addressed to WALTERS's supervisor. The letter also purported to be "Re: Square 1431 Lot 2003[,] 450 7th Street, N.W."—an impossible combination. As noted above, Square 1431, Lot 2003 does not exist. Moreover, 450 7th Street, NW is at Square 431, not 1431; Square 1431 is bounded by Loughboro Road, Overlook Lane, Overlook Road, and Glenbrook Road, in Upper Northwest Washington, D.C.

127. The body of the letter stated:

“This letter comes as a request for a tax refund in regards to the above reference [sic] property. I represent Greyrock Capital Group, Inc. as General Counsel and have been trying to clarify the company’s tax payments towards the real estate taxes as they relate to a tax exemption [sic] that was granted.

“After a conversation with Ms. Harriette Walters, Manager of the real [sic] Property Tax Adjustment Unit concerning our request for refund, she recommended that I contact you directly to authorize the refund of our monies from tax year 1995. We are requesting that this overpayment be refunded to us no later than November 5, 1999 to ensure the year end report of Greyrock Capital Group will be accurate. Ms. Walters have [sic] indicated that the processing of this refund would take six to eight weeks before a check will be mailed to us; we are therefore requesting your assistance in ensuring that our request is process [sic] expeditiously.

“I have enclosed copies of our cancelled checks for tax years 1994 and 1995 and anticipate the receipt of our check by the aforementioned date.”

128. In or about 1999, and throughout the scheme, WALTERS frequently created multiple fraudulent property tax refund vouchers simultaneously. This can be seen in the sequential VRRE numbers and in the dates the fraudulent vouchers were actually approved. WALTERS hid her fraudulent vouchers by including them in packets sent to Revenue Accounting that included large, legitimate refund vouchers.

129. On or about March 25, 1999, WALTERS created three fraudulent vouchers for three sets of co-conspirators:

- VRRE 7747, which fraudulently obtained a \$92,779.88 check for POPE;
- VRRE 7748, which fraudulently obtained a \$51,510.16 check for ALEXANDER; and
- VRRE 7750, which fraudulently obtained a \$190,230.00 check for PATRICIA STEVEN and ROBERT STEVEN.

130. WALTERS frequently chose fraudulent square and lot combinations that were often similar to legitimate combinations. With VRRE 2089, WALTERS added a “1” to the beginning of

the legitimate square number for 450 Seventh Street in Northwest. On other occasions, WALTERS used legitimate numbers on paperwork seen by some of her subordinates and improper numbers on paperwork that would be forwarded to Revenue Accounting (which, at the time, only checked to see if numbers were added correctly, not whether the refund was justified). WALTERS switched around square and lot numbers to hide her scheme: if an OTR employee ran a search in ITS to determine whether a tax refund was owed, and found that the square and lot number did not correspond to a property, WALTERS could retrieve the fraudulent voucher and claim the numbers were reversed; she would then resubmit the fraudulent voucher at another time.

131. In sum, in or about 1999, WALTERS created at least seven fraudulent property tax refunds. As a result, in or about 1999, WALTERS and her co-conspirators embezzled at least \$1,244,522.43 from the District of Columbia through their scheme.

2000

132. In or about October 2000, WALTERS brought her younger brother, RICHARD WALTERS, into her scheme. She brought RICHARD WALTERS into the scheme, in part, because he had a corporate account for his plumbing business, HELMET'S PLUMBING, that could be used to deposit large, fraudulently obtained District of Columbia property tax refund checks. As she had done with her other co-conspirators, WALTERS explained to RICHARD WALTERS that she could get District of Columbia property tax refund checks through her work at OTR even when no refund was due; that the checks would be in RICHARD WALTERS's company's name; and that RICHARD WALTERS would deposit the checks and then split the proceeds with WALTERS. RICHARD WALTERS agreed to participate in WALTERS's scheme.

133. In or about 2000, WALTERS and RICHARD WALTERS embezzled a total of \$124,829.01 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher No.	Check No.	Payees	Amount
10/6/00	VRRE 3024	5233322	HELMET-CROW COMPANY ATTN: JEFF NADEL, ESQ HOLD FOR PICK UP	\$124,829.01

134. The square and lot number combination used by WALTERS on VRRE 3024 does not exist in District of Columbia property records.

135. In or about 2000, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$1,762,016.41 from the District of Columbia through eight fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/29/00	VRRE 2514	5077420	QUADRANGLE DEVELOPMENT, INC ATTN: DAVID SAFFERN, ESQ HOLD FOR PICK UP	\$363,382.25
5/31/00	VRRE 2681	5129147	BELLARMINE AND ASSOCIATES ATTN: JEFF NADEL, ESQ 8707 GEORGIA AVENUE #807 SILVER SPRING, MD 20910	\$181,054.08

5/31/00	VRRE 2682	5129146	NINJA [sic] JO ASSOCIATES ¹⁵ CAMPBELL [sic] ¹⁶ - STEVEN, INC 11501 HUFF COURT KENNSINGTON [sic], MD 20895	\$223,001.38
6/29/00	VRRE 2814	5169275	PRIVATE PROPERTIES MANAGEMENT C/O PA STEVEN AND ASSOCIATES 1818 18TH STREET NW WASHINGTON, DC 20009	\$176,784.40
7/18/00	VRRE 2828	5169537	1250 EYE STREET AND ASSOCIATES C/O KWP STEVEN, AGENT, ¹⁷ HOLD FOR PICK UP	\$194,135.00
9/14/00	VRRE 2973	5235513	STEVENS PROPERTY MANAGEMENT C/O P. A. STEVEN, ESQ ¹⁸ 465 MAPLE AVENUE VIENNA, VA 22180	\$290,646.95
12/28/00	VRRE 3241	5279603	NORWEST CORPORATION C/O P.A. STEVEN,ESQ HOLD FOR PICK UP	\$222,640.01

¹⁵ The handwritten Refund Research Form attached to VRRE 2682 stated that the refund is for “Nina Jo Associates c/o Campbell Contst, Inc.” The SOAR voucher listed “Ninja” rather than “Nina,” added a third “l” to “Campbell,” and added “STEVEN.”

¹⁶ An employee in Revenue Accounting changed “CAMPBELL” to “CAMPBELL” before the check was issued.

¹⁷ The Refund Research Form did not list the name “Steven.” WALTERS added “KWP Steven, Agent” to the SOAR voucher.

¹⁸ PATRICIA STEVEN was not an attorney.

12/28/00	VRRE 3248	5279604	PRIVATE PROPERTIES, INC C/ABN-AMRO 1818 18TH STREET, N. E. WASHINGTON, DC 20009	\$110,372.34
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136. Of those eight fraudulent property tax refund vouchers created by WALTERS for PATRICIA STEVEN and ROBERT STEVEN, only one—VRRE 3241—used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records.

137. District of Columbia Check No. 5279604—the \$110,372.34 property tax refund check for VRRE 3248 to Private Properties, Inc., C/ABN-AMRO—was deposited into the BELLARMINE account at BOA controlled by PATRICIA STEVEN and ROBERT STEVEN even though the payee name on the check did not match any name associated with the BELLARMINE account.

138. In or about 2000, WALTERS and ALEXANDER embezzled a total of \$446,999.25 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
5/31/00	VRRE 2680	5129144	MEDICA;L [sic] ¹⁹ PROPERTIES, LLC ATTN: C.L. ALEXANDER, ESQ ²⁰ 1150 CONN AVE, N.W. #701 WASHINGTON, DC 20006	\$85,430.00

¹⁹ An employee in Revenue Accounting changed “MEDICA;L” to “MEDICAL” before the check was issued.

²⁰ ALEXANDER was not an attorney.

6/28/00	VRRE 2813	5169276	I & G CAPITOL [sic], INC C/O C.L. ALEXANDER, ESQ 8807 GEORGIA AVE, Suite 700 SILVER SPRING, MD 20910	\$125,069.25
12/28/00	VRRE 3240	5266626	WILLICO CONSTRU AND ASSOCIATES ATTN: C. L. ALEXANDER,ESQ HOLD FOR PICK UP	\$236,500.00

139. Of the three fraudulent property tax refund vouchers created by WALTERS for ALEXANDER, only one—VRRE 2680—used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records.

140. In or about 2000, WALTERS also embezzled \$823,498.86 from the District of Columbia by creating five additional fraudulent property tax vouchers:

Date	Voucher No.	Check No.	Payees	Amount
8/2/00	VRRE 2838	5181787	1800 INVESTORS LP C/O STUART A TUROW HOLD FOR PICK UP	\$47,255.28
9/11/00	VRRE 2974	5207892	AEGIS COMPANY, LLC ATTN: MAHT ACCOUNT HOLD FOR PICKUP	\$158,558.20

9/14/00	VRRE 2976	5221015	CSN DEVELOPMENTAL GROUP FINANCE GROUP /ATO- 01 808 17TH STREET, N.W. WAHSINGTON [sic], ²¹ DC 20006	\$287,581.85
11/6/00	VRRE 3089	5250736	MODERN MANAGEMENT CORP ATTN: CAFRITZ CO, AGENT HOLD FOR PICK UP	\$258,325.58
11/21/00	VRRE 3178	5244591	FIRST AMERICAN COMPANY ATTN: TAMMIE JOHNSON HOLD FOR PICK UP	\$71,777.95

141. Of these five additional fraudulent property tax refund vouchers created by WALTERS, only two—for VRRE 2838 and VRRE 3178—used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records. With respect to VRRE 3089, the SOAR Revenue Refund Voucher cited a non-existent square and lot combination but the Refund Research Form attached to the voucher cited a legitimate square and lot combination.

142. WALTERS’s scheme was only as effective as her ability actually to obtain the money from the fraudulently obtained District of Columbia property tax refunds: unless she had a way to cash or deposit the checks, the scheme would not succeed. WALTERS had long cultivated relationships with various tellers at BOA. Just as WALTERS had seen repeat players offer gratuities and holiday and birthday gifts to employees in WALTERS’s unit in the 1980s, in what was then the

²¹ An employee in Revenue Accounting changed “WAHSINGTON” to “WASHINGTON” before the check was issued.

Department of Finance and Revenue, WALTERS gave gifts to tellers and bank managers over the years. WALTERS's goal was to earn the trust of bank employees, so they would not question amounts or payee names of checks that were being deposited as a result of her scheme.

143. WALTERS met JONES in or about 1994, when she was a bank customer at a BOA branch at which JONES was working. WALTERS and JONES developed a friendship, and WALTERS began to ask JONES for assistance with many of her banking transactions when she visited his branch. As their friendship progressed, WALTERS offered \$100 for JONES's assistance with a transaction. After initially declining WALTERS's offer, JONES began routinely to accept gratuities from WALTERS, and the amounts quickly rose from \$100 per visit to \$1,000 per visit.

144. At WALTERS's request, and beginning in or about no later than September 2000, JONES deposited checks issued by the District of Columbia government into accounts controlled by WALTERS and her co-conspirators. WALTERS often called JONES to let him know that one of the co-conspirators would be coming with a check.

145. One of JONES's critical functions was to deposit the fraudulently obtained District of Columbia property tax refund checks, even when the payee names on the check bore no relationship to the name(s) or account holder(s) of the account into which the check was being deposited. JONES also cashed fraudulently obtained District of Columbia property tax refund checks for WALTERS and her co-conspirators even when he knew that the individuals presenting the checks had no right to the funds drawn on the check.

146. Thus, on or about September 27, 2000, while JONES worked as a teller at the Minnesota Avenue branch of BOA, in Northeast Washington, D.C., JONES cashed Check No. 5207892, a \$158,558.20 District of Columbia property tax refund check drawn on BOA Account No.

2547²² that listed the payee as “AEGIS COMPANY, LLC[,] ATTN:MAHT ACCOUNT.” JONES cashed this check even though he knew that neither WALTERS nor her co-conspirators had any right to the funds drawn on that check. In this way, JONES aided WALTERS in obtaining the proceeds of the fraudulently obtained property tax refund voucher denominated VRRE 2974.

147. In or about 2000, WALTERS continued her practice of simultaneously creating multiple fraudulent property tax vouchers. Thus, on or about May 31, 2000, WALTERS created one fraudulent voucher for ALEXANDER (VRRE 2680), and two for PATRICIA STEVEN and ROBERT STEVEN (VRRE 2681 and VRRE 2682). The sequential numbers of the VRRE numbers on those three vouchers demonstrate that they were prepared at the same time: the computer program that was used to prepare SOAR vouchers generated VRRE numbers in numerical order. On June 28, 2000, and June 29, 2000, WALTERS created one fraudulent voucher for ALEXANDER (VRRE 2813) and one for PATRICIA STEVEN and ROBERT STEVEN (VRRE 2814). On September 14, 2000, WALTERS created two fraudulent vouchers (VRRE 2973 and VRRE 2976). Finally, on December 28, 2000, WALTERS created three fraudulent property tax vouchers: one was for ALEXANDER (VRRE 3240) and two were for PATRICIA STEVEN and ROBERT STEVEN (VRRE 3241 and VRRE 3248).

148. In or about 2000, WALTERS continued to use legitimate cancelled property tax payment checks from property owners in creating fraudulent voucher packets. WALTERS attached legitimate checks to make it appear as if a refund was owed to the taxpayer based on what WALTERS attached to her fraudulent voucher packets. WALTERS collected legitimate cancelled checks that were circulating in RPTAAU and saved them for her use in her scheme. For example,

²² Only the last four digits are provided for bank accounts described herein.

in or about September 2000, WALTERS created VRRE 2974—a fraudulent \$158,558.20 property tax refund voucher to “AEGIS COMPANY, LLC[,] ATTN:MAHT ACCOUNT”—by attaching what purported to be a cancelled \$158,558.20 check dated September 14, 1999, from “AEGIS TITLE COMPANY, LLC[,] MAHT ACCOUNT.” The actual check was not from Aegis Title Company; WALTERS cut and pasted a mailing label from that company over the real payor name on the check.

149. The mailing label WALTERS attached to the check had a different background from the underlying check; and, rather than being lined up with other print on the check, the label was pasted on at an angle. Part of the label extended beyond the area of the check.

150. WALTERS successfully embezzled \$236,500.00 through the same cut and paste methodology for VRRE 3240. WALTERS attached a check purportedly from Standard Mortgage Corporation of Georgia in the amount of \$236,500.00. But, as with the check WALTERS attached to VRRE 2974, the payor information was cut from some other source—a source with a different background than the underlying check—and pasted on the check at an angle that did not line up with the other print on the check.

151. In sum, in or about 2000, WALTERS created at least seventeen fraudulent property tax refunds. As a result, in or about 2000, WALTERS and her co-conspirators embezzled at least \$3,157,343.53 from the District of Columbia through their scheme.

152. As noted above, WALTERS did not deposit the fraudulently obtained District of Columbia property tax refund checks into her own accounts. Instead, co-conspirators agreed to help her obtain access to the funds. Thus, for example, JONES cashed the fraudulently obtained property tax refund or deposited them into a co-conspirator’s personal or corporate banking account.

153. Once the checks were deposited or cashed, WALTERS received her share of the illicit proceeds through (1) checks written to WALTERS for deposit into her account, (2) account transfers from one of the co-conspirators' accounts at BOA or another banking institution into one of WALTERS's accounts, or (3) through both methods.

154. Although WALTERS had active bank accounts at a number of different banking institutions, her primary account—the one out of which she conducted the largest number and size of transactions—was her personal checking account at BOA, Account No. 5677. From in or about November 1999 to in or about November 2007—a period in which Walters and her co-conspirators embezzled \$42,657,607.06 from the District of Columbia—approximately \$9,840,184.31 was deposited into WALTERS's Account No. 5677.²³ Earlier bank records generally do not exist.

155. In or about 2000, \$691,787.19 was deposited into WALTERS's primary banking account, Account No. 5677 at BOA.

156. In or about 2000, WALTERS withdrew \$668,431.53 from Account No. 5677 through ATM withdrawals, cash out transactions, personal checks, check card purchases, electronic bill payments, and counter withdrawals. Of that amount, \$527,711.89 or nearly 79 percent of the withdrawals were through personal checks written by WALTERS.

157. In or about 2000, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$20,417.33 on her Nordstrom's credit

²³ Also during that period, \$524,844.05 was deposited into WALTERS's savings account at BOA, Account No. 6430; \$428,816.21 was deposited into WALTERS's account at Provident Bank, Account No. 3727; \$329,236.58 was deposited into WALTERS's checking account at PNC Bank, Account No. 1398; \$7,703.76 was deposited into another of WALTERS's checking accounts at BOA, Account No. 5278; and \$12,390.16 was deposited into WALTERS's savings account at the District Government Employees Federal Credit Union, Account No. 1327.

card. In or about 2002, WALTERS gambled during at least six trips to Las Vegas and one trip to Atlantic City.

2001

158. In or about 2001, WALTERS brought her niece, TURNBULL, into her scheme. As she had done with her other co-conspirators, WALTERS explained to TURNBULL that she could get District of Columbia property tax refund checks through her work at OTR even when no refund was due; and that TURNBULL would deposit the checks into bank accounts she controlled and then split the proceeds with WALTERS. TURNBULL agreed to participate in WALTERS's scheme.

159. For the first few months of 2001, TURNBULL deposited the fraudulently obtained District of Columbia property tax refund checks into a personal checking account she controlled at BOA, Account No. 2665. In or about November 2001, to avoid the suspicions likely to be raised by such large checks going into her personal account, TURNBULL opened a business account at BOA for her home cleaning business, LEGNA HOME SERVICES, Account No. 2655. TURNBULL thereafter deposited fraudulently obtained District of Columbia property tax refund checks into the LEGNA HOMES SERVICES account.

160. In or about 2001, WALTERS and TURNBULL embezzled a total of \$1,344,985.96 from the District of Columbia through eight fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
1/18/01	VRRE 3279	5286890	WASHINGTON I [sic] ²⁴ R.E. INVESTMENT C/O STUART TUROW, ESQ HOLD FOR PICKUP	\$137,571.33

²⁴ An employee in Revenue Accounting changed "WASHINGTON I R.E." TO "WASHINGTON R.E. INVESTMENT" before the check was issued.

3/14/01	VRRE 3405	5309460	PM REALTY GROUP C/O STUART TUROW, ESQ HOLD FOR PICK UP	\$251,270.50
4/17/01	VRRE 3463	5331272	HORNING HOUSING CORPORATION ²⁵ 1350 CONN AVE #808 WASHINGTON, DC 20038	\$190,065.38
5/21/01	VRRE 3557	5352849	JONES LAND [sic] LASALLE ATTN: C. E. ZARNEKE HOLD FOR PICK UP	\$135,269.34
6/11/01	VRRE 3558	5368457	MONUMENT REALTY GROUP ATTN: DAVID FUSS, ESQ HOLD FOR PICK UP	\$105,217.46
7/27/01	VRRE 3696	5403135	STILLMAN GROUP, INC 670 WHITE PLAINS ROAD SCARSDALE, NY 10563	\$141,345.99
7/27/01	VRRE 3727	5403136	INTREPID EYE STREET, LLC ATTN: C.L. ALEXANDER ²⁶ 1720 EYE STREET NW WASHINGTON, DC 20004-3704	\$122,078.21

²⁵ The handwritten Refund Research Form stated that the payee was “Horning Housing Corporation, c/o Helmet-Crow, LLC.”

²⁶ This voucher listed ALEXANDER as the payee, but it was deposited into Account No. 2665, TURNBULL’s personal checking account at BOA.

10/5/01	VRRE 3899	5445809	DELOITTE [sic] AND TOUCHE PROPERTY MANAGEMENT ATTN: DAVID A. FUSS, ESQ 1150 18TH STREET, NW #400 WASHINGTON, DC 20036-3841	\$262,167.75
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161. Of the eight fraudulent property tax refund vouchers created by WALTERS for TURNBULL in or about 2001, only one—VRRE 3463—used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records. However, for five of the vouchers, the Refund Research Form referenced a legitimate square and lot combination, but the SOAR voucher form itself had an illegitimate combination. For example, the Refund Research Form for VRRE 3899 referenced Square 1661, Lot 0817—a valid combination that pertains to a large commercial office building at 5301 Wisconsin Avenue, in Northwest Washington, D.C. By contrast, the SOAR Revenue Refund Voucher for VRRE 3899 referenced Square 1601, Lot 817—a combination that does not exist. The documents attached to VRRE 3899 as purported support for the refund did not pertain to the property at 5301 Wisconsin Avenue.

162. WALTERS used false square and lot combinations to ensure that if anyone from Revenue Accounting checked to see if the information on one of her SOAR vouchers was actually reflected in the system, the Revenue Accounting employee would find no information on the property rather than finding that no refund was due on a particular property. WALTERS believed that, if she were ever asked about an invalid square and lot combination, she blame a subordinate and promise to look into the matter.

163. Even though none of those eight vouchers listed TURNBULL as a payee, all eight checks were successfully deposited into TURNBULL's personal checking account at BOA, Account No. 2665.

164. In or about 2001, WALTERS and ALEXANDER embezzled a total of \$365,025.99 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
9/14/01	VRRE 3847	5445810	JBS VENTURE ATTN:C. L ALEXANDER, INC P.O. BOX 75 CABIN JOHN, MD 20818	\$126,000.00
11/15/01	VRRE 4068	5475732	FEDDISTRICT, LLC/TRAMMELL ATTN: ALEXANDER LEMONS,ESQ BOX 300060 RICHMOND, VA 22316	\$124,829.01
12/28/01	VRRE 4192	5492166	DC 17TH STREET CORPORATION ATTN: C. L. LEMOS, ESQ 700 BRAND BLVD 300 SILVER SPRING, MD 20787	\$114,196.98

165. Of the three fraudulent property tax refund vouchers created by WALTERS for ALEXANDER in or about 2001, none used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records. However, for two of the vouchers—VRRE 4068 and VRRE 4192, the respective Refund Research Form referenced a legitimate square and lot combination, but the SOAR voucher form itself had an illegitimate combination.

166. In or about 2001, WALTERS and RICHARD WALTERS embezzled a total of \$513,311.82 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/23/01	VRRE 3387	5300293	LASOLANA DC, INC ATTN: HELMET-CROW, AGENT HOLD FOR PICK UP	\$168,163.08
5/2/01	VRRE 3474	5342850	DEVELOPMENT RESOURCES C/O 799 NINTH STREET LP II HOLD FOR PICK UP	\$95,148.74
6/11/01	VRRE 3618	5378404	STOLADI PROPERTY , INC 13434 PT PLEASANT DRIVE CHANTITLY [sic], ²⁷ VA 20151-2454	\$250,000.00

167. Of the three fraudulent property tax refund vouchers created by WALTERS for RICHARD WALTERS in or about 2001, only one—VRRE 3387—used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records. By contrast, VRRE 3474 did not have a legitimate square and lot combination on either the SOAR voucher or the Refund Research Form; and VRRE 3618 had an illegitimate combination on the SOAR voucher but a legitimate combination on the Research Form.

168. All three of those fraudulently obtained property tax refund checks were deposited into the corporate bank account of RICHARD WALTERS’s plumbing company, HELMET’s

²⁷ Someone at OTR hand-corrected the typed word “CHANTITLY” to read “CHANTILLY.”

PLUMBING, which was BOA Account No. 1389. Two of the checks—for VRRE 3474 and VRRE 3618—were successfully deposited even though the payee names did not match any names associated with the account.

169. In or about 2001, WALTERS, PATRICIA STEVEN, and ROBERT STEVEN embezzled a total of \$986,511.51 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
3/20/01	VRRE 3388	5316912	CARR REAL ESTATE SERVUCES [sic] ²⁸ ATTN: P.A STEVEN, ESQ 1850 STREET [sic], N.W. WASHINGTON, DC 20008	\$347,068.49
5/2/01	VRRE 3412	5342849	900 F ST ASSOCIATE, LLC C/O GMACC [sic] MORTGAGE CORPORATION 650 DRESTER ROAD HERSHAM [sic], PA 19044-0809	\$201,867.11
9/7/01	VRRE 3765	5424874	ACQUIPORT FOUR ATTNI [sic] DAVID FUSS, ESQ 1666 K STREET, N. W., WASHINGTON, DC 20006	\$437,575.91

²⁸ Someone at OTR hand-corrected the typed word “SERVUCES” to read “SERVICES.”

170. Of those three fraudulent property tax refund vouchers, only one—VRRE 3412—used a square and lot combination that appears in District of Columbia property records.

171. All three of those checks were deposited into the BELLARMINE corporate bank account controlled by PATRICIA STEVEN and ROBERT STEVEN, which was BOA Account No.

1745. Two of the checks—for VRRE 3412 and VRRE 3765—were successfully deposited even though the payee names did not match any names associated with the account.

172. In or about 2001, WALTERS also embezzled \$305,836.57 from the District of Columbia by creating two additional fraudulent property tax vouchers:

Date	Voucher No.	Check No.	Payees	Amount
10/30/01	VRRE 3936	5461532	PRUDENTIAL ASSET RESOURCES C/O BRENDA SMITH 2200 ROSS AVENUE SUITE 4200E DALLAS, TX 75201	\$160,691.25
12/14/01	VRRE 4149	5482442	INSIGNIA/ESG, INC ATTN: JEFF NADEL, ESQ 7507 GEORGIA AVENUE SILVER SPRING, MD 20786	\$145,145.32

173. In or about 2001, WALTERS continued preparing vouchers simultaneously. On or about June 11, 2001, WALTERS created two fraudulent vouchers: VRRE 3558, a \$105,217.46 check deposited into TURNBULL’s personal account at BOA, and VRRE 3618, a \$250,000 check deposited into RICHARD WALTERS’s HELMET’S PLUMBING account at BOA. On or about July 27, 2001, WALTERS prepared two fraudulent vouchers, both of which were deposited into TURNBULL’s personal account: VRRE 3696, for \$141,345.99, and VRRE 3727, for \$122,078.21.

174. In or about 2001, at least three of the fraudulently obtained property tax refund checks—for VRRE 4068, VRRE 4149, and VRRE 4192—were cashed at the Minnesota Avenue branch of BOA, where JONES was a banking center service manager.

175. In or about 2001, WALTERS continued to create fraudulent voucher packets by using legitimate cancelled property tax payment checks from property owners. For VRRE 3696, WALTERS re-used the same check purporting to be from Standard Mortgage Corporation of Georgia that she attached to VRRE 2974 in or about September 2000.

176. In sum, in or about 2001, WALTERS created at least nineteen fraudulent property tax refunds. As a result, in or about 2001, WALTERS and her co-conspirators embezzled at least \$3,515,671.85 from the District of Columbia through their scheme.

177. In or about 2001, \$728,937.20 was deposited into WALTERS's primary banking account, Account No. 5677 at BOA.

178. In or about 2001, WALTERS withdrew \$749,564.26 from Account No. 5677 through ATM withdrawals, cash out transactions, personal checks, check card purchases, electronic bill payments, and counter withdrawals.²⁹ Of that amount, \$629,195.75 or nearly 84 percent of the withdrawals were through personal checks written by WALTERS.

179. In or about 2001, WALTERS gave significant amounts of cash and other items of value to OTR employees. In addition, in or about 2001, WALTERS wrote at least \$9,954.00 in checks from Account No. 5677 to OTR co-workers.

²⁹ WALTERS was able to withdraw more from Account No. 5677 than what she deposited into that account in 2001 because of her remaining balance on December 31, 2000.

180. In or about 2001, and in addition to purchases she made with cash, check, or other financial instruments at Neiman Marcus, WALTERS charged \$153,627.93 on her Neiman Marcus credit card. Also in or about 2001, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$18,721.83 on her Nordstrom's credit card. Also in or about the last four months of 2001, WALTERS charged \$36,319.34 on her American Express card. In or about 2001, WALTERS made at least six gambling trips to Las Vegas.

2002

181. Having brought two relatives—RICHARD WALTERS and TURNBULL—into her scheme, WALTERS began to reduce her use of non-family members to deposit the fraudulently obtained District of Columbia property tax refund checks. WALTERS believed she could better trust family members, and she wanted to share more of the proceeds of her scheme with family.

182. In or about 2002, WALTERS and ALEXANDER embezzled a total of \$486,655.44 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/15/02	VRRE 4319	5520825	GRUBB AND ELLIS C/O LEMOS HOME SERVICES ATTN: CHERI DELANEY, RPA	\$185,627.02
4/14/02	VRRE 4458	5551194	JENCO GROUP, INC ATTN: LEMOSHUME [sic] SERVICES 730 11TH STREET N. W. #700 WASHINGTON, DC 2001 [sic] ³⁰	\$86,576.42

³⁰ An employee in Revenue Accounting changed “2001” to “20001” before the check was issued.

8/9/02	VRRE 4882	5629026	AVALONBAY COMMUNITIES, INC C/O C. L. ALEXANDER, ESQ HOLD FOR PICK UP	\$214,452.00
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183. None of these three vouchers used a genuine square and lot combination that appears in District of Columbia property records. However, the Refund Research Form accompanying one of the vouchers—VRRE 4458—used a legitimate square and lot combination.

184. In or about 2002, WALTERS and RICHARD WALTERS embezzled a total of \$634,360.06 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
6/19/02	VRRE 4198	5600590	ARENT FOX KINTNER ATTN: KATHERINE KELLY [sic] 1050 CONN AVENUE, NW WASHINGTON, DC 20036-5339	\$393,852.06
11/21/02	VRRE 8304	5711176	L AND B 1775 I STREET GROUP C/O WILKES AND ARTIS HOLD FOR PICK-UP	\$240,508.00

185. RICHARD WALTERS deposited or cashed both checks even though neither his name nor the name HELMET'S PLUMBING appeared on either check.

186. The SOAR Revenue Refund Voucher for VRRE 4198 purported to be a property tax refund for the owner of the property located at square 465, lot 879. There is no such property in District of Columbia property records. Moreover, the secondary payee name on the voucher misspelled the surname of an attorney who was working at the law firm, Arent Fox, the primary

payee. The Refund Research form for VRRE 4198 cited a different plot: square 456, lot 879. There is no such property in District of Columbia property records. Finally, attached to the voucher as purported support for the refund was a cancelled check from the American Association of Retired Persons, which owns the property at 601 E Street, in Northwest, Washington, D.C. That property had the same square number as what was listed on the Refund Research Form—456—but the lot number for the AARP building is not 879, it is 2001 et seq.

187. In or about 2002, WALTERS and TURNBULL embezzled a total of \$1,303,049.19 from the District of Columbia through six fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
3/27/02	VRRE 4421	5541933	JONES LANG LASALLE, INC C/O WILES [sic] AND ARTIS HOLD FOR PICK UP	\$222,303.28
4/14/02	VRRE 4459	5551193	WIYNTER [sic] AND ASSOCIATES, INC C/O WILKES AND ARTIS HODL [sic] ³¹ FOR PICKUP	\$74,299.20
10/18/02	VRRE 8082	5677198	PIPER RUDRICK [sic] PARTNERSHIP C/O LENA HOME SERVICES HOLD FOR PICK UP	\$225,835.05
10/29/02	VRRE 8166	5692048	CAPITOL COMMONS C/O ALEXADER [sic] POPE, HOLD FOR PICK UP	\$134,099.89

³¹ An employee in Revenue Accounting changed “HODL” to “HOLD” before the check was issued.

11/8/02	VRRE 8212	5702628	CAPMARK SERVICES, INC LENAHOME [sic] TAX SERVICE CORP 1717 H ST N. W WASHINGTON, DC 2006 [sic]	\$271,045.02
12/20/02	VRRE 8457	5719968	TRIZECHAHN INC, LLC C/O LEMOSHOMES [sic] SERVICES HOLD FOR PICK UP	\$375,466.75

188. None of those five vouchers used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records. However, the Refund Research Form for four of the vouchers—VRRE 8082, VRRE 8166, VRRE 8212, and VRRE 8457—used legitimate square and lot combinations.

189. In or about 2002, WALTERS also embezzled \$872,216.11 from the District of Columbia by creating four additional fraudulent property tax vouchers:

Date	Voucher No.	Check No.	Payees	Amount
2/5/02	VRRE 4368	5508908	NEHEMIAH LTD PARTNERSHIP JEFF NADEL, ESQ 2400 14TH STREET, N. W. WASHINGTON, DC 20036	\$190,065.38
4/25/02	VRRE 4475	5564180	KAEMPFER MANAGEMENT, SER [sic] ATTN: TANYA CASTRO 1501 K STREET, N.W. #300 WASHINGTON, DC 20006	\$347,392.12

5/9/02	VRRE 4517	5574039	J. R. MORRISS AND ASSOCIATES. LLC JEFF NADEL, ESQ 9805 KIRKTREE COURT FAIRFAX, VA 22032	\$105,382.11
7/3/02	VRRE 4786	5606267	HUNSON PAIGE ASSOCIATES, LTD C/O WILKES AND ARTIS, ESQ 1660 K STREET, NW WASHINGTON, DC 20009	\$229,376.50

190. Of the four additional fraudulent property tax refund vouchers created by WALTERS, only one—VRRE 4786—used a square and lot combination that applied to a genuine parcel of land in District of Columbia property records. However, the Refund Research Form for one of the three additional vouchers—VRRE 4368—used a legitimate square and lot combination.

191. At the direction of WALTERS, JONES distributed proceeds of the scheme among and between the co-conspirators and to other beneficiaries. For example, on or about Friday, May 17, 2002, the \$347,392.12 check associated with VRRE 4475, Check No. 5564180, was not directly deposited into one of the co-conspirators' accounts but was instead cashed by JONES at the Minnesota Avenue branch of BOA. Thereafter, on or about May 17, 2002, JONES conducted the following transactions with the \$347,392.12 in District of Columbia funds:³²

³² \$5,000 of the \$347,392.12 cannot be traced.

Date	Amount	Type/Purpose	Payable to/ Deposit to	Remitter	Check No.
5/17/02	\$2,000.00	Deposit into TURNBULL BOA CD Account No. 4501	TURNBULL	n/a	n/a
5/17/02	\$55,000.00	Deposit into TURNBULL BOA Account No. 2655	TURNBULL	n/a	n/a
5/17/02	\$10,000.00	Deposit into TURNBULL BOA Account No. 4488	TURNBULL	n/a	n/a
5/17/02	\$92,000.00	Cashier's check purchase	WALTERS	WALTERS	222434
5/17/02	\$92,000.00	Cashier's check purchase	RICHARD WALTERS	WALTERS	222435
5/17/02	\$10,000.00	Cashier's check purchase	ALEXANDER	WALTERS	222436
5/17/02	\$10,000.00	Cashier's check purchase	Individual Four	WALTERS	222437
5/17/02	\$10,000.00	Cashier's check purchase	TURNBULL	WALTERS	222438
5/17/02	\$61,392.12	Cashier's check purchase	WALTERS	WALTERS	222440

192. To conceal the proceeds of the original \$347,392.12 even further, WALTERS conducted additional transactions the following week, on or about Tuesday, May 21, 2002. Thus, at WALTERS's direction, JONES cashed Cashier's Check No. 222434, the \$92,000 check made payable to WALTERS, and then conducted several transactions:

Date	Amount	Type/Purpose	Payable to/ Deposit to	Remitter	Check No.
5/21/02	\$9,000.00	Deposit into WALTERS BOA Account 5677	WALTERS	n/a	n/a
5/21/02	\$5,000.00	Deposit	Individual Four	n/a	n/a
5/21/02	\$12,500.00	Cashier's check purchase	ALEXANDER	WALTERS	222484
5/21/02	\$12,500.00	Cashier's check purchase	ALEXANDER	WALTERS	222485
5/21/02	\$15,000.00	Cashier's check purchase	WALTERS	WALTERS	222486
5/21/02	\$33,000.00	Cashier's check purchase	WALTERS	WALTERS	222487

193. Similarly, on or about May 21, 2002, to conceal the provenance of his proceeds, and with the assistance of JONES, the following transactions were conducted with the \$92,000 cashier's check made payable to RICHARD WALTERS, Check No. 222435:

Date	Amount	Type/Purpose	Payable to/ Deposit to	Remitter	Check No.
5/21/02	\$43,000.00	Deposit into RICHARD WALTERS BOA Account No. 7747	RICHARD WALTERS	n/a	n/a
5/21/02	\$5,000.00	Cashier's check purchase	RICHARD WALTERS	RICHARD WALTERS	222475
5/21/02	\$5,000.00	Cashier's check purchase	RICHARD WALTERS	RICHARD WALTERS	222476
5/21/02	\$17,000.00	Cashier's check purchase	RICHARD WALTERS	RICHARD WALTERS	222477
5/21/02	\$17,000.00	Cashier's check purchase	RICHARD WALTERS	RICHARD WALTERS	222478

194. In or about 2002, at least six of the fraudulently obtained checks—for VRRE 4319, VRRE 4517, VRRE 4786, VRRE 4882, VRRE 8166, VRRE 8212—were deposited or cashed at the Minnesota Avenue branch of BOA, where JONES was a banking center service manager.

195. JONES also took complex steps to disguise the connection or link of checks (which indicated the payee name and account information) to his fellow co-conspirators' accounts.

196. Ordinarily, when a customer enters a bank to deposit a check, the customer uses a deposit slip indicating the amount of the check being deposited (and often the routing number of the check), endorses the check, and hands the check and deposit slip to the teller. The teller gives the customer a receipt for the deposit. A bank (or government) official looking at that transaction would be able to see the deposit slip and the check itself. The process ensures that a bank (or government) official may determine the source of funds being deposited into the customer's account.

197. JONES took steps to obfuscate the process and thereby hide the source of funds. On occasion, JONES substituted a cash-in-ticket—i.e., a slip indicating that the customer was depositing currency—for the actual check to make it appear that the customer deposited cash, not the check that was the true source of the funds.

198. Hiding the source of the funds in this fashion required at least three steps. First, JONES used the check brought in by one of his co-conspirators to be the offset for a cash-out ticket. That made it appear that the person cashed the check even though no cash left the bank. Second, JONES used a cash-in ticket to offset the cash-out ticket. Third, he attached the cash-in ticket to the co-conspirator's deposit slip.

199. For example, on or about July 5, 2002, JONES engaged in a transaction that purported to be a cash-in transaction in the amount of \$342,852.06 into RICHARD WALTERS's HELMET's

PLUMBING account at BOA, Account No. 1389. One of the co-conspirators did not deposit \$342,852.06 in cash and coins at a teller window on that day. Instead, JONES disguised that he was actually cashing Check No. 5600590, a \$393,852.06 District of Columbia property tax refund check dated July 2, 2002, made payable to “ARENT FOX KINTNER[,] ATTN: KATHERINE KELLY [sic][,] 1050 CONN AVENUE, NW[,] WASHINGTON, DC 20036-5339.”

200. On a number of occasions, JONES also followed this cash-in, cash-out process to hide the source of other large transactions among and between the co-conspirators that involved proceeds of the scheme. Even though the transactions involved checks or cashier’s checks, JONES created a paper trail to suggest falsely that, for example, TURNBULL had come into the Minnesota Avenue branch of BOA on or about March 31, 2002, with \$80,000.00 in cash to deposit.

201. If any of those transactions had in fact been cash deposits of that magnitude, JONES would have been required to file a Currency Transaction Report, pursuant to Title 31, United States Code, Section 5311 et seq. JONES did not file any CTRs with respect to any of the cash transactions exceeding \$10,000 made by one of his co-conspirators.

202. In sum, in or about 2002, WALTERS created at least fifteen fraudulent property tax refunds. As a result, in or about 2002, WALTERS and her co-conspirators embezzled at least \$3,296,280.80 from the District of Columbia through their scheme.

203. In or about 2002, \$672,675.02 was deposited into WALTERS’s primary banking account, Account No. 5677 at BOA.

204. In or about 2002, WALTERS withdrew \$678,620.72 from Account No. 5677 through ATM withdrawals, cash-out transactions, personal checks, check card purchases, electronic bill

payments, and counter withdrawals.³³ Of that amount, \$462,002.48 or 68 percent of the withdrawals were through personal checks written by WALTERS.

205. In or about 2002, WALTERS gave significant amounts of cash and other items of value to OTR employees. In addition, in or about 2002, WALTERS wrote at least \$29,605.00 in checks from Account No. 5677 to OTR co-workers.

206. In or about 2002, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$19,854.81 on her Nordstrom's credit card. In or about 2002, and in addition to purchases she made with cash, check, or other financial instruments at Neiman Marcus, WALTERS charged \$136,521.90 on her Neiman Marcus credit card. In or about 2002, WALTERS also charged \$124,834.42 on her American Express card. In or about 2002, WALTERS gambled on at least four trips to Las Vegas and two trips to Atlantic City.

2003

207. In or about July 2003, JONES moved from the Minnesota Avenue branch of BOA to the Iverson Mall branch of BOA, in Temple Hills, Maryland.

208. In or about 2003, all but two of the fraudulently obtained District of Columbia property tax refund checks were deposited into TURNBULL's LEGNA HOME SERVICES account at BOA, Account No. 4539.

209. In or about 2003, WALTERS and TURNBULL embezzled a total of \$4,771,776.55 from the District of Columbia through seventeen fraudulent property tax refunds:

³³ WALTERS was able to withdraw more from Account No. 5677 than what she deposited into that account in 2002 because of her remaining balance on December 31, 2001.

Date	Voucher	Check No.	Payees	Amount
1/27/03	VRRE 8593	5743022	LEGNAHOME SERVICES, INC ATTN: C. L. ALEXANDER, ESQ ³⁴ HOLD FOR PICKUP	\$179,184.72
3/7/03	VRRE 8771	5767324	MONUMEN [sic] REALTY, LLC C/O WILKES AND ARTIS ESQ. HOLD FOR PICK UP	\$250,000.00
3/24/03	VRRE 8799	5785189	BOSTOM [sic] ³⁵ PROPERTIES, INC LEGNAHOME SERVICES HOLD FOR PICK UP	\$290,646.95
3/27/03	VRRE 8814	5789326	CHARLES E. SMITH REALTY GROUP C/O LEGNAHOMES ERVICES [sic], INC HOLD FOR PICP [sic] UP	\$242,609.00
4/23/03	VRRE 8885	5805385	TRAMMELL CROW COMPANY C/O LEGHOME [sic] SERVICES, LLC HOLD FOR PICK UP	\$258,990.35
5/20/03	VRRE 9042	5817354	BERNARD S. GEWIRZ, CO C/O LEGNAHOME SERVICES, INC HOLD FOR PICK [sic]	\$248,801.08

³⁴ This check listed ALEXANDER as the second payee, but it was deposited into TURNBULL's Legna Home Services account at BOA, Account No. 4539.

³⁵ Someone at OTR hand-corrected the typed word "BOSTOM" to read "BOSTON."

6/13/03	VRRE 9213	5836060 ³⁶	LEGNAHOME SERVICE, INC C/O DAVID FUSS, ESQ 1666 K STREET, NW WASHINGTON, DC 20006	\$339,088.00
7/3/03	VRRE 9279	5845816	BELLARMINE DESIGN GROUP ³⁷ C/O SHRODER R.E. ATTN: DAVID FUSS, ESQ	\$284,165.00
7/21/03	VRRE 9446	5864049	1511 K STREET PARTNERSHIP C. [sic] DAVID FUSS, ESQ 1911 K STREET, N. W. #650 WASHINGTON, DC 20006	\$157,732.85
7/22/03	VRRE 9445	5864048	IB ASSOCIATES LIMITED PARTNERSHIP C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$392,261.00
8/29/03	VRRE 9608	5883858	1201 F STREET, LLC C/O WILKES ARTIS/ DAVID FUSS, ESQ HOLD FOR PICK UP	\$379,600.10
8/29/03	VRRE 9609	5883857	1500 K STREET, LLC C/O LEGNA HOMESERVICES, INC WILKES AND ARTIS/DAVID FUSS, ESQ	\$176,400.00

³⁶ The check for VRRE 9213 did not list DAVID FUSS, ESQ as a secondary payee, which means that line was not entered by employees in Revenue Accounting.

³⁷ Even though this check listed the payee as BELLARMINE, it was deposited into TURNBULL's LEGNA HOME SERVICES account at BOA, Account No. 4539.

9/15/03	VRRE 9717	5902139	THE JDG COMPANIES C/O STUART TUROW/WILKES ARTIS HOMD [sic] FOR PICK UP	\$177,655.49
10/9/03	VRRE 9736	5908142	CAPMARK SERVICE , LP C/O LEGNAHOME SERVICES 245 PEACH TREE CENTER ATLANTA, GA30303- 1231	\$180,663.60
11/28/03	VRRE 0294	5942249	TREMCO, LP C/O STUART TUROW, ESQ HOLD FOR PICKUP	\$241,210.77
11/28/03	VRRE 0298	5942250	TRAMMELL CROW COMPANY C/O STUART TUROW, ESQ HOLD FOR PICKUP	\$225,686.00
12/5/03	VRRE 0364	5950262	THE MARK WINKLER COMPANY C/O DAVID FUSS/WILKES AND ANTIS [sic], ESQ	\$187,167.56

210. Nine of those fraudulently obtained District of Columbia property tax refund checks—for VRRE 8771, VRRE 9279, VRRE 9445, VRRE 9446, VRRE 9608, VRRE 9717, VRRE 0294, VRRE 0298, and VRRE 0364—were successfully deposited into TURNBULL’s LEGNA HOME SERVICES account at BOA, Account No. 4539, even though the payee information on the refund checks did not match any names associated with TURNBULL’s account.

211. Between in or about January 2003 and in or about May 2003, while JONES was still at the Minnesota Avenue branch of BOA, at least four of the fraudulently obtained District of

Columbia property tax refund checks—for VRRE 8771, VRRE 8799, VRRE 8885, and VRRE 9042—were deposited into TURNBULL’s account through a transaction at the Minnesota Avenue branch of BOA. The check for VRRE 0364 was deposited into TURNBULL’s LEGNA HOME SERVICES account on or about December 17, 2003, at the Iverson Mall branch of BOA, after JONES began working at that branch.

212. Only three of the seventeen additional fraudulent property tax refund vouchers created by WALTERS for TURNBULL—VRRE 8814, VRRE 8885, and VRRE 9213—used a square and lot combination that appears in District of Columbia property records. However, the Refund Research Form for five of the remaining TURNBULL vouchers—VRRE 9446, VRRE 9609, VRRE 9736, VRRE 0294, and VRRE 0298—used legitimate square and lot combinations.

213. In or about 2003, WALTERS and RICHARD WALTERS embezzled a total of \$270,896.00 from the District of Columbia through one fraudulent property tax refund:³⁸

Date	Voucher	Check No.	Payees	Amount
10/9/03	VRRE 9791	5908139	555 11TH LLP C/O STUART TURNE [sic]/ WILKES AND ANTIS [sic]	\$270,896.00

214. The fraudulently obtained District of Columbia property tax refund check associated with VRRE 9791—Check No. 5908139—was successfully deposited into RICHARD WALTERS’s HELMET’s PLUMBING account at BOA, Account No. 1389, even though the payee names on the check bore no relation to any names on RICHARD WALTERS’s account.

³⁸ Neither the SOAR Revenue Refund Voucher nor the Refund Research Worksheet associated with VRRE 9791 referenced a legitimate square and lot number.

215. In or about 2003, WALTERS and PATRICIA STEVEN and ROBERT STEVEN embezzled a total of \$289,018.08 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher	Check No.	Payees	Amount
2/11/03	VRRE 8693	5749754	THE WASHINGTON DEVELOPMENT , LLC C/O BELLARMINE GROUP HOLD FOR PICK UP	\$289,018.08

216. The SOAR Revenue Refund Voucher and the Refund Research Worksheet associated with VRRE 8693 cited a legitimate square and lot number, square 247, lot 873, which corresponded to 1155 14th Street, in Northwest Washington, D.C. WALTERS attached copies of three cancelled checks paid from the owner of the property at that square and lot number: Washington D.C. Hotel Partners, LP, dba Holiday Inn Downtown. However, neither BELLARMINE, PATRICIA STEVEN, nor ROBERT STEVEN was entitled to any refund owed to Hotel Partners or the Holiday Inn.

217. Although in or about 2002 WALTERS spread out the fraudulent property tax refund vouchers through the year,³⁹ in or about 2003 WALTERS returned to her practice of simultaneously creating multiple fraudulent vouchers. Thus, on or about August 29, 2003, WALTERS created VRRE 9608 and VRRE 9609: the fraudulently obtained property tax refund check for the former voucher was deposited into one of TURNBULL's LEGNA HOME SERVICES accounts at BOA, Account No. 4539; the check for the second voucher that day was deposited into another of TURNBULL's LEGNA HOME SERVICES accounts at BOA, Account No. 3993. Both checks were deposited into TURNBULL's accounts on or about the same day: September 4, 2003. Moreover,

³⁹ On or about April 14, 2002, WALTERS created VRRE 4458 and 4459.

on or about October 9, 2003, WALTERS created two fraudulent vouchers: VRRE 9736 and VRRE 9791. The check for VRRE 9736 was deposited into TURNBULL's Account No. 4539. The check for VRRE 9791 was deposited into RICHARD WALTERS's HELMET'S PLUMBING account, Account No. 1389. Both checks were deposited on or about the same day: October 16, 2003. Finally, on or about November 28, 2003, WALTERS created VRRE 0294 and VRRE 0298. On or about December 3, 2003, the check for VRRE 0294 was deposited into TURNBULL's Account No. 4539, and the check for VRRE 0298 was deposited into TURNBULL's Account No. 3993. The relatively short amount of time between the creation of each of these six vouchers and the deposit of the checks demonstrates that WALTERS expedited the payment on the vouchers.

218. In sum, in or about 2003, WALTERS created nineteen fraudulent property tax refunds. As a result, in or about 2003, WALTERS and her co-conspirators embezzled at least \$4,771,776.55 from the District of Columbia through their scheme.

219. In or about 2003, \$852,301.98 was deposited into WALTERS's primary banking account, Account No. 5677 at BOA.

220. In or about 2003, WALTERS withdrew \$847,890.43 from Account No. 5677 through ATM withdrawals, cash-out transactions, personal checks, check card purchases, electronic bill payments, and counter withdrawals. Of that amount, \$680,015.54 or 80 percent of the withdrawals were through personal checks written by WALTERS.

221. In or about 2003, WALTERS gave significant amounts of cash and other items of value to OTR employees. In addition, in or about 2003, WALTERS wrote at least \$63,457.00 in checks from Account No. 5677 to OTR co-workers.

222. In or about 2003, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$28,865.58 on her Nordstrom's credit card. In or about 2003, and in addition to purchases she made with cash, check, or other financial instruments at Neiman Marcus, WALTERS charged \$153,345.62 on her Neiman Marcus credit card. In or about 2003, WALTERS also charged \$70,964.24 on her American Express card. In or about 2003, WALTERS gambled during at least two trips to Las Vegas and one trip to Atlantic City.

2004

223. In or about 2004, WALTERS and TURNBULL embezzled a total of \$7,029,428.09 from the District of Columbia through twenty-one fraudulent property tax refund checks, all of which were deposited into one of TURNBULL's LEGNA HOME SERVICES accounts:

Date	Voucher	Check No.	Payees	Amount
1/7/04	VRRE 491	5964693	KAEMPFER MANAGEMENT, SER [sic] C/O LEGNAHOME SERVICES 1501 K STREET NW #300 WASHINGTON, DC 20005	\$295,359.80
1/9/04	VRRE 493	5971993	2011 LAND, LTD WILKES ARTIS, ESQ HOLD FOR PICKUP	\$195,655.24
1/30/04	VRRE 678	5980626	LEGNAHOME SERVICE, LLC C/O DAVID FUSS, ESQ HOLD FOR PICK UP	\$357,800.00

2/18/04	VRRE 776	6002425	BELLARMINE ASSOCIATES, INC ⁴⁰ KAEMPFER MGMT SVC HOLD FOR PICKUP	\$335,000.00
3/29/04	VRRE 929	6025808	BTODKELFD [sic] INC, LTD C/O WILKES ARTIS, ESQ HODL [sic] FOR PICK UP	\$346,700.00
4/13/04	VRRE 987	6036567	BOSTON PROPERTIES C/O WILKES ARTIS, ESQ HOLD FOR PICK UP	\$271,045.02
5/28/04	VRRE 1260	6063571	GRUBB AND ELLIS C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$202,263.76
5/28/04	VRRE 1261	6063572	TROMMEL [sic] CROW COPR [sic] C/O WILKES ARITS [sic], LLC HOLD FOR PICK UO [sic]	\$324,000.00
6/23/04	VRRE 1415	6079987	CARRREALTY [sic] GROUP, INC C/O LEGNAHOME SERVICES HOLD FOR PICK UP	\$368,000.00
6/23/04	VRRE 1416	6079986	CAPTAINCO AMERICA, LLC C/O LEGNAHOME SERVICES, INC HOLD FOR PICK UP	\$324,416.91
7/9/04	VRRE 1491	6084637	PRINCIPAL FINANCIAL PARTNERS C/O LEGNAHOME SERVICES, INC HOLD FOR PICK UP	\$264,429.22

⁴⁰ This check was deposited into TURNBULL's LEGNA HOME SERVICES account at BOA, Account No. 3993, even though it was made out to BELLARMINE.

7/20/04	VRRE 1537	6098561	TOWER CONSTRUCTION [sic] CIMOANY [sic], INC C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$452,650.99
8/10/04	VRRE 1597	6108893	2001 ASSOCIATED CROW, LLX [sic] C/O LEGNAHOME SERVICES, INC HOLD FOR PICK UP	\$360,870.00
8/27/04	VRRE 1648	6119737	19TH AND K VENTURE C/O WILKES ARTIS, LLC HOLD FOR PICKUP	\$388,200.96
10/29/04	VRRE 1889	6159697	TRAMMELCROW CORP C/O LEGNAHOMW [sic] WERVICES [sic] HOLD FOR PICKUP	\$333,981.65
11/12/04	VRRE 1981	6177668	BILKEMOR [sic] LLC REAL ESTAE [sic], INC C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$346,700.00
11/29/04	VRRE 2045	6182292	MONUMENT REALTY GROUP C/O LENA [sic] HOME SERVICES HOLD FOR PICK-UP	\$465,509.49
12/10/04	VRRE 2088	6189970	CSC PENN, LLC C/O DAVID FUSS, ESQ HOLD FOR PICK UP	\$367,025.00
12/10/04	VRRE 2089	6189969	PAOST MASS AVE, LLC C/O DAVID FUSS, ESQ HOLD FOR PICK UP	\$319,339.89
12/27/04	VRRE 2124	6200532	K STREET BROUP [sic], LLC C/O DAVID FUSS, ESQ HOLD FOR PIICK [sic] UP	\$340,900.00

12/27/04	VRRE 2125	6199183	PENN AVE PROPERTIES GROUP, LLC C/O LEGNAHOME SERVICES INC HOLD FOR PICKUP	\$369,580.16
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224. Ten of those twenty-one checks—for VRRE 678, VRRE 776, VRRE 929, VRRE 987, VRRE 1261, VRRE 1648, VRRE 1981, VRRE 2088, VRRE 2089, VRRE 2124—were successfully deposited into one of TURNBULL’s LEGNA HOME SERVICES accounts at BOA, Account No. 4539 or Account No. 3993, even though the payee information on the refund checks did not match any names associated with TURNBULL’s accounts.

225. At least nine of the checks—for VRRE 929, VRRE 987, VRRE 1261, VRRE 1537, VRRE 1597, VRRE 1648, VRRE 1889, VRRE 1981, and VRRE 2088—were deposited at the Iverson Mall branch of BOA, where JONES was either a banking center service manager or, as of in or about September 2004, an assistant manager of the branch.

226. Fourteen of the twenty-one vouchers referenced non-existent square and lot combinations on the SOAR Revenue Refund Voucher.

227. In or about 2004, WALTERS and RICHARD WALTERS embezzled a total of \$1,612,322.25 from the District of Columbia through five fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/25/04	VRRE 796	6005773	BEERS AND CUTLER C/O CAROLYN WIDNER HOLD FOR PICK UP	\$245,900.00
3/29/04	VRRE 928	6025807	2020 F STREET JOINT VENTURE, LLC C/O WILKES ARTIS , ESQ HOLD FOR PICKUP	\$317,147.25

5/14/04	VRRE 1161	6058185	EQUITY PROPERTY GROUP, LLC C/O LEGNAHOMW ⁴¹ [sic] SERVICES HOLD FOR PICKUP	\$297,615.00
8/27/04	VRRE 1647	6119738	225 VIRGINAI [sic]/ TREMONT, LLC C/O LEGNAHOME SERVICE, INC ⁴² HOLD FOR PICKUP	\$425,660.00
11/29/04	VRRE 2046	6182291	TRIZECHAHN LLC C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$326,000.00

228. All five of those checks were successfully deposited into RICHARD WALTERS’S HELMET’S PLUMBING account at BOA, Account No. 1389, even though the payee name on the checks did not match any names associated with RICHARD WALTERS’S account.

229. At least three of the five fraudulently obtained District of Columbia property tax refund checks—for VRRE 1161, VRRE 1647, and VRRE 2046—were deposited at the Iverson Mall branch of BOA, where JONES was an assistant manager.

230. The SOAR Revenue Refund Voucher for four of the five refunds used a square and lot combination that does not exist in District of Columbia property records. All four showed a legitimate square and lot combination on the attached Refund Research Form.

⁴¹ Check No. 6058185 was deposited into RICHARD WALTERS’S HELMET’S PLUMBING account, Account No. 1389, even though LEGNA HOME SERVICES, albeit misspelled, is a payee.

⁴² Check No. 6119738 was deposited into RICHARD WALTERS’S HELMET’S PLUMBING account even though LEGNA HOME SERVICES was a payee.

231. On seven occasions in or about 2004, WALTERS created two fraudulent property tax refund vouchers on the same day.

Date Created	Vouchers	Date(s) Checks Issued	Depositor Account(s)	Date(s) Deposited
3/29/04	VRRE 928	4/13/04	HELMET'S PLUMBING 1389	4/15/04
	VRRE 929		LEGNA HOME 3993	4/28/04
5/28/04	VRRE 1260	6/14/04	LEGNA HOME 3993	6/29/04
	VRRE 1261		LEGNA HOME 4539	
6/23/04	VRRE 1415	7/6/04	LEGNA HOME 3993	7/7/04
	VRRE 1416			7/9/04
8/27/04	VRRE 1647	9/10/04	HELMET'S PLUMBING 1389	9/15/04
	VRRE 1648		LENGA HOME 3993	9/24/04
11/29/04	VRRE 2045	12/3/04	LEGNA HOME 4539	12/16/04
	VRRE 2046		HELMET'S PLUMBING 1389	12/10/04
12/10/04	VRRE 2088	12/17/04	LEGNA HOME 3993	12/20/04
	VRRE 2089			12/30/04
12/27/04	VRRE 2124	12/29/04	LEGNA HOME 3993	1/5/05
	VRRE 2125	1/3/05		12/30/04

232. In or about 2004, WALTERS continued using legitimate cancelled checks that she found in RPTAAU. For VRRE 1491, WALTERS attached as support a \$264,429.22 check to the District of Columbia Treasurer from SASS Muni IV, LLC, dated June 14, 2004. The memo line of that check referred to "Square 0695[,] Lot 0817," which pertains to an industrial warehouse at 82 I Street, in Southeast. The SOAR Revenue Refund Voucher referred to a different square and lot number—square 5369, lot 2006—that does not exist in District of Columbia property records.

233. Similarly, on or about August 10, 2004, WALTERS submitted VRRE 1597—a fraudulent \$360,870.00 property tax refund voucher—for a property purportedly located at square 78, lot 40, which was located at 2001 Pennsylvania Avenue, in Northwest. However, as supporting documentation for VRRE 1597, WALTERS attached a property tax bill and cancelled check for a different property—square 78, lot 847—that was located at 2020 K Street, in Northwest.

234. On or about November 12, 2004, WALTERS successfully embezzled \$346,700.00 through VRRE 1981 even though it used the name “BILKEMOR [sic] LLC REAL ESTAE [sic], Inc.” as the primary payee. The SOAR Revenue Refund Voucher for VRRE 1981 purported to be for a property at square 581, lot 42—a combination that does not exist in District of Columbia property records. The Refund Research Form accompanying VRRE 1981 referred to a different property, at square 185, lot 828. Moreover, the voucher packet for BILKEMOR [sic] LLC REAL ESTAE [sic] contained two checks as supporting documentation, neither of which lists that company: (1) a March 22, 2000, check for \$930,309.04 from Transamerica Real Estate Tax Service, and (2) an August 18, 2003, check for \$681,021.48 check from Wells Fargo Home Mortgage. Finally, the Refund Research Form for VRRE 1981, which is supposed to show the taxes paid, taxes owed, and any refund due, did not reflect payments in the amounts on the attached checks.

235. In sum, in or about 2004, WALTERS created twenty-six fraudulent property tax refunds. As a result, in or about 2004, WALTERS and her co-conspirators embezzled at least \$8,641,750.34 from the District of Columbia through their scheme.

236. In or about 2004, \$1,050,617.84 was deposited into WALTERS’s primary banking account, Account No. 5677 at BOA.

237. In or about 2004, WALTERS withdrew \$1,032,262.74 from Account No. 5677 through ATM withdrawals, cash-out transactions, personal checks, check card purchases, electronic bill payments, and counter withdrawals. Of that amount, \$772,959.63 or nearly 75 percent of the withdrawals were through personal checks written by WALTERS.

238. In or about 2004, WALTERS gave significant amounts of cash and other items of value to OTR employees. In addition, in or about 2004, WALTERS wrote at least \$122,829.00 in checks from Account No. 5677 to OTR co-workers.

239. In or about 2004, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$53,503.47 on her Nordstrom's credit card. Also in or about 2004, and in addition to purchases she made with cash, check, or other financial instruments at Neiman Marcus, WALTERS charged \$201,880.58 on her Neiman Marcus credit card. In or about 2004, WALTERS charged \$111,722.34 on her American Express card. In or about 2004, WALTERS gambled on at least two trips to Las Vegas and one trip to Atlantic City.

2005

240. By in or about December 2004, WALTERS had created at least twenty-two fraudulent property tax refund vouchers that listed LEGNA HOME SERVICES or a variant as a payee. Many of those checks were deposited into accounts TURNBULL had created at BOA for LEGNA HOME SERVICES. WALTERS was concerned about raising suspicions at OTR or BOA with one company name appearing so many times on property tax refunds. Thus, in or about December 2004, with the cooperation of JONES and at the direction of WALTERS, TURNBULL opened a new account at BOA for a sham company, CHAPA INTERIORS, which was Account No. 7785. In or about September 2005, TURNBULL opened a second account at BOA for CHAPA INTERIORS, Account

No. 2467. In or about October 2005, TURNBULL closed her Account No. 4539 for LEGNA HOMES SERVICES.

241. In or about April 2005, JONES transferred from the Iverson Mall branch of BOA to the Johns Hopkins branch of BOA, in Baltimore, Maryland. Given that all of his co-conspirators lived in or near Washington, D.C., not in the Baltimore, Maryland area, JONES’s transfer to the Johns Hopkins branch made transactions through him less convenient. The number of checks JONES deposited for his co-conspirators decreased from 2004 to 2005.

242. In or about 2005, WALTERS and TURNBULL embezzled a total of \$6,085,629.63 from the District of Columbia through eighteen fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
1/7/05	VRRE 2156	6207432	MASS AVE, LLC LEGNAHOME SERVICES, INC HOLD FOR PICKUP	\$223,593.11
1/7/05	VRRE 2157	6209376	SUMMITT PROPERTIES C/O CHAPAHOME LLC ⁴³ HOLD FOR PICK UP	\$338,772.62
1/21/05	VRRE 2233	6219483	111 13TH STREET, LLC C/O CHAPPAHOME SERVICES, INC HOLD FOR PICK UP	\$397,007.00
2/25/05	VRRE 2337	6243600	1301 LIMITED PARTNERSHIP C/O CHAPPAHOME SERVICES, INC HOLD FOR PICK UO [sic]	\$350,000.00

⁴³ Even though TURNBULL opened this under the name CHAPA HOME SERVICES, the fraudulent property tax refund vouchers and checks vary between calling the sham company “Chappa” and “Chapa.”

3/17/05	VRRE 2358	6258376	JAD ASSOCIATES, INC C/O CHAPPAHOME SERVICING HOLD FOR PICKUP	\$379,000.00
4/15/05	VRRE 2431	6282221	BGW, LLP C/O WILKES AND ARTIS , LLC HOLD FOR PICK UP	\$329,913.31
5/20/05	VRRE 2525	6299390	FRANKLIN TOWERS, LLP C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$356,900.00
5/20/05	VRRE 2526	6299389	LASALLE PARTNERSHIP, LLP C/I [sic] ⁴⁴ WILKES ARTIS HOLD FOR PICKUP	\$340,000.00
6/24/05	VRRE 2587	6325292	CARFRTZCOMPANY [sic] ⁴⁵ C/O DAVID FUSS, ESQ HOLD FOR PICK UP	\$410,900.00
7/21/05	VRRE 2654	6351562	BREBLACKTHORNE REAL TY C/O DAVID FUSS, ESQ HOLD FOR PICK UP	\$344,625.59
7/25/05	VRRE 2655	6355418	TRAMMEL CROW COMPANY C/O WILKES AND ARTIS STUART TUROW,ESQ HOLD FOR PICK UP	\$225,686.00

⁴⁴ An employee in Revenue Accounting changed “C/I” to “C/O” before the check was issued.

⁴⁵ An employee in Revenue Accounting changed “CARFRTZCOMPANY” to “CAR FRTZ COMPANY” before the check was issued.

9/13/05	VRRE 2776	6372324	SECOND STREET C/O WILKES ARTIS STRENT [sic], TUROW ESQ HOLD FOR PICK-UP	\$301,196.00
10/6/05	VRRE 2822	6394635	BGEE LLP/CHAPPA HOME C/O WILKES ARTIS HOLD FOR PICK UP	\$329,913.31
10/6/05	VRRE 2823	6394634	FUND III GMBHAND CO KE, LLP C/O DAVID FUSS HOLD FOR PICKUP	\$373,005.00
11/10/05	VRRE 2871	6440366	JACKSON-CAMPBELL, LL [sic] CHAPPAHOME DESIGN, INC HOLD FOR PICK UP	\$234,227.20
11/10/05	VRRE 2872	6415377	PROPERTY DEVELOPMENT CORP. LLC C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$422,890.00
12/9/05	VRRE 2908	6434068	COLLIER INTERNATIONAL, LLC C/O DAVID FUSS, ESQ HOLD FOR PICK UP200 [sic]	\$348,000.49
12/29/05	VRRE 2936	6446678	THIIRTEEN [sic] STREET ASSOCIATES C/O CHAPPAHOME, INC HOLD FOR PICKUP	\$380,000.00

243. Eleven of those checks—for VRRE 2431, VRRE 2525, VRRE 2526, VRRE 2587, VRRE 2654, VRRE 2655, VRRE 2776, VRRE 2823, VRRE 2872, VRRE 2908, and VRRE 2936—were successfully deposited into one of TURNBULL’s CHAPA INTERIORS accounts at

BOA, Account No.7785 or Account No. 2467, even though the payee information on those refund checks did not match any names associated with one of TURNBULL’s accounts.

244. At least one of the eighteen checks—for VRRE 2337—was deposited at the Iverson Mall branch of BOA, while JONES was still at the branch; and at least two of the checks—for VRRE 2654 and VRRE 2822—were deposited at the Johns Hopkins branch of BOA, after JONES had transferred to that branch.

245. Only two of the SOAR Revenue Refund Vouchers for these eighteen fraudulently obtained property tax refunds—for VRRE 2655 and VRRE 2823—used a square and lot combination that exists in District of Columbia property records. For twelve of the eighteen vouchers, the Refund Research Form cited square and lot numbers that applied to actual properties.

246. In or about 2005, WALTERS and RICHARD WALTERS embezzled a total of \$1,021,500.08 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
1/21/05	VRRE 2234	6219484	TISHMANSPEYER PROPERTIES C/O LEGNAHOMES SERVICES HOLD FOR PPICKUP [sic]	\$362,000.00
6/24/05	VRRE 2588	6325291	WASHINGTON REALTY CGOUPR [sic] ⁴⁶ C/O WILKES ARTIS, LLcHOLD [sic] FOR PICKUP	\$349,600.00

⁴⁶ An employee in Revenue Accounting changed “CGOUPR” to “GROUP” before the check was issued.

12/9/05	VRRE 2909	6434067	FIFTEEN STREET LTD PARTNERSHIP C/O CHAPPAHOME ⁴⁷ CORPORATIONC/ [sic] HOLD FOR PICKUP	\$309,900.08
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247. All three of those fraudulently obtained District of Columbia property tax refund checks were successfully deposited into RICHARD WALTERS's HELMET'S PLUMBING account at BOA, Account No. 1389, even though the payee information on the refund checks did not match any names associated with RICHARD WALTERS's account.

248. At least one of those three checks—for VRRE 2588—was deposited at the Johns Hopkins branch of BOA during the time when JONES was an assistant manager at that branch.

249. None of the SOAR Revenue Refund Vouchers for these three vouchers used a square and lot combination that exists in District of Columbia property records. However, for two of the three vouchers, the attached Refund Research Form cited legitimate square and lot combinations.

250. On seven occasions in or about 2005, WALTERS created two fraudulent property tax refund vouchers on the same day:

Date Created	Date(s) Vouchers	Date(s) Checks Issued	Depositor Account(s)	Date(s) Deposited
1/7/05	VRRE 2156	1/21/05	LEGNA HOME 3993	1/21/05
	VRRE 2157		CHAPA INTERIORS 7785	
1/21/05	VRRE 2233	2/3/05	CHAPA INTERIORS 7785	2/16/05
	VRRE 2234		HELMET'S PLUMBING 1389	2/8/05

⁴⁷ This check was deposited into RICHARD WALTERS's HELMET'S PLUMBING account, Account No. 1389, even though it was made out to Chappahome, a TURNBULL account.

5/20/05	VRRE 2525	5/26/05	LEGNA HOME 3993	6/17/05
	VRRE 2526			6/1/05
6/24/05	VRRE 2587	7/6/05	CHAPA INTERIORS 7785	7/7/05
	VRRE 2588		HELMET'S PLUMBING 1389	7/15/05
10/6/05	VRRE 2822	10/19/05	CHAPA INTERIORS 2467	10/25/05
	VRRE 2823		CHAPA INTERIORS 7785	11/7/05
11/10/05	VRRE 2871	11/15/05	CHAPA INTERIORS 2467	11/30/07
	VRRE 2872	12/28/05		1/6/06
12/9/05	VRRE 2908	12/20/05	CHAPA INTERIORS 2467	12/22/05
	VRRE 2909		HELMET'S PLUMBING 1389	12/23/05

251. In or about 2005, WALTERS continued to attempt to hide her scheme by varying square and lot numbers on the paperwork that would be submitted to Revenue Accounting for entry into the computer system. Thus, for example, the SOAR Revenue Refund Voucher created by WALTERS for VRRE 2233 on or about January 21, 2005, produced a \$397,007.00 refund check to “111 13TH STREET, LLC[,] C/O CHAPPAHOME SERVICES, INC[,] HOLD FOR PICK UP.” The SOAR voucher for VRRE 2233 purported to be for square 237, lot 841—a square and lot combination that does not exist in District of Columbia property records. However, the Refund Research Form attached to VRRE 2233 cited square 327 and lots 840 and 841. Lot 840 is a commercial office building at 500 Twelfth Street, and lot 841 is a commercial office building at 550 Twelfth Street; both properties are in Southwest Washington, D.C.

252. The documents attached to VRRE 2233 as support for the \$397,007.00 property tax refund were unrelated to or in conflict with the information available in the voucher itself and in District of Columbia property records. One of the documents was a \$465,509.49 check from

Monument Realty LLC to the District of Columbia Treasurer dated August 31, 2004. The memo line of the check cited square 247, lot 0097, which is a commercial office building at 1100 13th Street, in Northwest, not “111 13th Street.” The Refund Research Form, which is supposed to indicate dates and amounts of property tax payments by the taxpayer seeking the refund, did not indicate a payment on or about August 31, 2004. A second check attached as support for VRRE 2233, a \$901,202.52 check from the John Hancock Real Estate Investment Group bore handwriting that noted “Sq 0327[,] Lot 0841.” WALTERS added that handwritten information to make it appear that the unrelated check was paid by the taxpayer seeking the refund in VRRE 2233.

253. The SOAR Revenue Refund Voucher for VRRE 2525 purported to be a refund for the owner of a property at square 271, lot 52; but that is not a square and lot combination in District of Columbia property records. The Refund Research Form for VRRE 2525 cited a square number, 217, but no lot number. Square 217, however, refers to the block that is bordered by Fourteenth, K, and L Streets, and Vermont Avenue, in Northwest. As to the primary payee name for VRRE 2525, there is a property called Franklin Towers; but it is located at 1401 I Street. Most importantly, WALTERS attached a copy of a \$417,743.03 check from TC Midatlantic Development, Inc. to the District of Columbia Treasurer. The memo line for that check cited “Sq 537, Lot 811 Property Taxes.” Lot 811 in square 537 is a commercial office building at 410 Fourth Street, in Southwest.

254. When WALTERS created fraudulent vouchers, she used large, legitimate, cancelled property tax checks that she found in RPTAAU. She tried to tailor the fraudulent vouchers in a way that bore some relationship to the cancelled checks, so that a cursory glance at the voucher packet would not lead to any suspicions. WALTERS recycled legitimate property tax payment checks from commercial lenders and property owners in her fraudulent voucher packets. WALTERS attached

the same legitimate check—a \$1,253,642.02 check dated September 1, 2005, from Prudential Asset Resources to the District of Columbia Treasurer—to the fraudulent voucher packets for both VRRE 2872, in November 2005, and VRRE 2936, in December 2005.

255. In sum, in or about 2005, WALTERS created twenty-one fraudulent property tax refunds. As a result, in or about 2005, WALTERS and her co-conspirators embezzled at least \$7,107,129.71 from the District of Columbia through their scheme.

256. In or about 2005, \$2,099,346.89 was deposited into WALTERS's primary banking account, Account No. 5677 at BOA.

257. In or about 2005, WALTERS withdrew \$2,108,623.55 from Account No. 5677 through ATM withdrawals, cash-out transactions, personal checks, check card purchases, electronic bill payments, and counter withdrawals.⁴⁸ Of that amount, \$1,573,213.99 or nearly 75 percent of the withdrawals were through personal checks written by WALTERS.

258. In or about 2005, WALTERS gave significant amounts of cash and other items of value to OTR employees. In addition, in or about 2005, WALTERS wrote at least \$402,987.25 in checks from Account No. 5677 to OTR co-workers.

259. In or about 2005, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$70,150.28 on her Nordstrom's credit card. Also in or about 2005, and in addition to purchases she made with cash, check, or other financial instruments at Neiman Marcus, WALTERS charged \$271,507.38 on her Neiman Marcus credit card. In or about 2006, WALTERS charged \$178,468.46 on her American Express card. In

⁴⁸ WALTERS was able to withdraw more from Account No. 5677 than what she deposited into that account in 2005 because of her remaining balance on December 31, 2004.

or about 2005, WALTERS gambled during at least three trips to Atlantic City and one trip to Las Vegas. In or about August 2005, WALTERS also paid for a group of her friends and family to join her on a vacation to Paris, France.

2006

260. In or about January 2006, JONES transferred from the Johns Hopkins branch of BOA to the Eastpoint Mall branch, in Baltimore, Maryland.

261. In or about 2006, WALTERS brought her nephew, RICARDO WALTERS, into her scheme. As she had done with her other co-conspirators, WALTERS explained to RICARDO WALTERS that she could get District of Columbia property tax refund checks through her work at OTR even when no refund was due; and that RICARDO WALTERS would deposit the checks into bank accounts he controlled and then split the proceeds with WALTERS. RICARDO WALTERS agreed to participate in WALTERS's scheme.

262. To participate in the scheme, and at the direction of WALTERS, RICARDO WALTERS opened two corporate checking accounts at BOA in the name of PROVIDENT HOME SERVICES. In or about December 2005, RICARDO WALTERS opened Account No. 0064 for PROVIDENT HOME SERVICES, and in or about January 2006, he opened Account No. 6409 for that company. RICARDO WALTERS used only Account No. 0064 of PROVIDENT HOME SERVICES to deposit fraudulently obtained District of Columbia property tax refund checks; he did not directly deposit such checks into Account No. 6409.

263. WALTERS suggested "Provident" because it sounded like a firm that might receive large property tax refund checks. PROVIDENT HOME SERVICES was a home cleaning business.

264. In or about 2006, WALTERS and RICARDO WALTERS embezzled a total of \$2,887,137.17 from the District of Columbia through seven fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
3/3/06	VRRE 3024	6481288	111 13TH STREET, LLC C/O POVIDENT [sic] HOME INC HOLD FOR PICK UP	\$385,500.36
4/6/06	VRRE 3069	6502674	BPCRF AVE, LLC C/O PROVIDENT HOME INC 901 NEW YORK AVE UNIT #400 WASHINGTON, DC 20001-4413	\$420,540.90
5/26/06	VRRE 3134	6543366	1401 H STREET LLC C/O PROVIDENTHOME , INC HOLD FOR PICK UP	\$468,000.00
6/1/06	VRRE 3142	6554423	BOWEN BUILDNG [sic] , LLC PROVIDENT HOME, INC HOLD FOR PICK UP	\$485,680.91
8/24/06	VRRE 3297	6588507	1919 M STREET ASSOCIATES, LLC C/O PROVIDENTHOME HOLD FOR PICK UP	\$375,815.00
9/18/06	VRRE 3362	6608809	LINCON [sic] SQUARE , LLC C/O PROVIDENT HOME LTD HOLD FOR PICK UP	\$375,800.00
10/16/06	VRRE 3395	6622187	COMMERCE BULIDING [sic] ASSOC C/O BELLARMINE CORPATION [sic], LLP HOLD FOR PICK UP	\$375,800.00

265. At least six of those checks—for VRRE 3024, VRRE 3069, VRRE 3134, VRRE 3142, VRRE 3362, and VRRE 3395—were deposited at the Eastpoint Mall branch of BOA, where JONES was an assistant manager.

266. Only one of the seven vouchers—for VRRE 3134—cited a square and lot combination that exists in District of Columbia property records. All but one of the Refund Research Forms accompanying the vouchers—for VRRE 3069—cited an existing square and lot combination.

267. In or about 2006, WALTERS and TURNBULL embezzled a total of \$3,127,960.00 from the District of Columbia through eight fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/6/06	VRRE 2971	6463505	BBLAKE [sic] COMPANY, LLC CHAPPAHOME INC HOLD FOR PICKUP	\$346,800.00
2/6/06	VRRE 2973	6468798	SRANN COMPANY C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$325,000.00
3/3/06	VRRE 3025	6480869	1425 F STREET, LLC/CHAPPAHOME, LLC C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$356,900.00
4/6/06	VRRE 3071	6502673	STOLADI PROPERTY, GROUP C/O CHAPPA HOME INC.	\$385,700.00
5/12/06	VRRE 3118	6521637	MRL POST, LLC C/O CHAPPAHOME LIMITED, HOLD FOR PICK UP	\$387,900.00

6/1/06	VRRE 3143	6540925	12TH STREET PROPERTIES C.O BELLARMIN [sic] DESIGN GROUP HOLD FOR PICKUP	\$456,990.00
8/24/06	VRRE 3296	6588506	1120 VERMONT STREET ASSOCIATES, LTD C./O CHAPPAHOME LLC HILD [sic] FOR PICJUP [sic]	\$410,000.00
9/18/06	VRRE 3363	6608808	LINCOLN SQUARE , LLC CHAPPAHOME DESIGN, LTD HOLD PICJUP [sic]	\$458,670.00

268. At least six of those eight checks—for VRRE 2973, VRRE 3071, VRRE 3118, VRRE 3143, VRRE 3296, and VRRE 3363—were deposited at the Eastpoint Mall branch of BOA, where JONES was an assistant manager. The check for VRRE 2973, Check No.6468798, was successfully deposited into one of TURNBULL’s CHAPA INTERIORS accounts at BOA, Account No. 2467, even though the payee name bore no relation to any names on TURNBULL’s account.

269. Only one of the eight vouchers—for VRRE 3071—cited an actual square and lot combination that exists in District of Columbia property records. However, four of the eight Refund Research Forms accompanying the vouchers—for VRRE 2971, VRRE 2973, VRRE 3118, and VRRE 3296—cited an existing square and lot combination.

270. In or about 2006, WALTERS and PATRICIA STEVEN and ROBERT STEVEN embezzled a total of \$842,000.00 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
5/12/06	VRRE 3117	6521636	POTOMANC [sic] ASSOCIATES, LLP C/O BELLARMINE DESIGN HOLD FOR PICK UP	\$352,000.00
6/30/06	VRRE 3194	6554424	BELLARMINE HOME. LLC C/O WILKES, ARTIS. ESQ HOLD FOR PICK UO [sic]	\$490,000.00

271. Both of those fraudulently obtained District of Columbia property tax refund checks were deposited at the Eastpoint Mall branch of BOA, where JONES was an assistant manager.

272. Neither voucher cited a square and lot combination on either the SOAR Revenue Refund Voucher or the Refund Research Form that existed in District of Columbia property records.

273. In or about 2006, WALTERS and RICHARD WALTERS embezzled a total of \$460,000.00 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher	Check No.	Payees	Amount
10/16/06	VRRE 3396	6622186	1118 LO ASSOC C/O HELMETCORPORATION HOLD FOR PICK UP	\$460,000.00

274. That fraudulently obtained District of Columbia property tax refund check was deposited at the Eastpoint Mall branch of BOA, where Jones was an assistant manager.

275. The SOAR Revenue Refund Voucher for VRRE 3396 did not refer to an existing square and lot combination in District of Columbia property records, although the Refund Research Form did cite an existing square and lot combination.

276. In or about 2006, WALTERS continued to reuse legitimate checks that she found in RPTAAU. Attached to VRRE 3024 was the same \$465,509.49 check from Monument Realty LLC that WALTERS attached to VRRE 2233 on or about January 21, 2005. Even though the memo line of that check cited “Sq 0247 Lot 0097,” and the SOAR Revenue Refund Voucher for VRRE 3024 purported to be for the property at square 327, lot 814, and even though square 327, lot 814 does not exist in District of Columbia property records, WALTERS succeeding in getting the District of Columbia to create a \$385,500.36 property tax refund check for VRRE 3024.

277. Similarly, for VRRE 3296, a \$410,000.00 fraudulent refund, WALTERS attached as supporting documentation the same \$417,743.03 check from TC Midatlantic Development, Inc. to the District of Columbia Treasurer that she attached to VRRE 2525. The memo line for that check cited “Sq 537, Lot 811 Property Taxes.” Lot 811 in square 537 is a commercial office building at 410 Fourth Street, in Southwest. By contrast, VRRE 3296 purported to be for the owner of the property at square 412, lot 109, a combination that does not exist in District of Columbia property records. WALTERS also attached to VRRE 3296 a \$145,145.32 cancelled check from DC 17th Street Corporation, c/o Insignia/ESG, Inc., even though the check bore a handwritten reference to an entirely different property: “1100 17th St[,] Lot # 0093 — Sq # 0162.”

278. WALTERS was able to embezzle \$458,670.00 through VRRE 3363 by attaching the same legitimate, cancelled check—a \$1,253,642.02 check dated September 14, 2005, from Prudential Asset Resources to the District of Columbia Treasurer—that she attached to the fraudulent voucher packets for VRRE 2872, in November 2005, and VRRE 2936, in December 2005.

279. Similarly, WALTERS was able, through VRRE 3117, to create a fraudulent \$352,000.00 property tax refund for the purported owner of a property at square 534, lot 7000: “POTOMANC [sic] ASSOCIATES, LLP[,] C/O BELLARMINE DESIGN” even though (a) there is no square 534, lot 7000 in District of Columbia property records, and (b) the Refund Research Form attached to VRRE 3117 cites a different property, at square 4435, lot 7000—another combination that does not exist in property records. Most significantly, however, WALTERS was able successfully to embezzle \$352,000.00 through VRRE 3117 even though WALTERS attached as supporting documentation for the fraudulent voucher a copy of a tax bill to Potomac Creek Associates that specifically lists a different property: square 387, lot 866.

280. On eight occasions in or about 2006, WALTERS created two fraudulent property tax refund vouchers on the same day:

Date Created	Vouchers	Date(s) Checks Issued	Depositor Account(s)	Date(s) Deposited
2/6/06	VRRE 2971	2/10/06	CHAPA INTERIORS 2467	2/17/06
	VRRE 2973	2/22/06		2/24/06
3/3/06	VRRE 3024	3/13/06	PROVIDENT HOME 0064	3/16/06
	VRRE 3025	3/10/06	CHAPA INTERIORS 2467	3/24/06
4/6/06	VRRE 3069	4/13/06	PROVIDENT HOME 0064	4/14/06
	VRRE 3071		CHAPA INTERIORS 2467	
5/12/06	VRRE 3117	5/16/06	BELLARMINE 1745	5/19/06
	VRRE 3118		CHAPA INTERIORS 2467	
6/1/06	VRRE 3142	7/7/06	PROVIDENT HOME 0064	7/10/06
	VRRE 3143	6/16/06	CHAPA INTERIORS 2467	6/21/06

8/24/06	VRRE 3296	8/28/06	CHAPA INTERIORS 2467	9/1/06
	VRRE 3297		PROVIDENT HOME 0064	
9/18/06	VRRE 3362	9/27/06	PROVIDENT HOME 0064	9/29/06
	VRRE 3363		CHAPA INTERIORS 2467	
10/16/06	VRRE 3395	10/19/06	PROVIDENT HOME 0064	12/7/06
	VRRE 3396		HELMET'S PLUMBING 1389	10/23/06

281. In sum, in or about 2006, WALTERS created eighteen fraudulent property tax refunds. As a result, in or about 2006, WALTERS and her co-conspirators embezzled at least \$7,317,097.17 from the District of Columbia through their scheme.

282. In or about 2006, \$2,182,725.93 was deposited into WALTERS's primary banking account, Account No. 5677 at BOA.

283. In or about 2006, WALTERS withdrew \$2,116,342.31 from Account No. 5677 through ATM withdrawals, cash-out transactions, personal checks, check card purchases, electronic bill payments, and counter withdrawals. Of that amount, \$1,509,538.25 or 71 percent of the withdrawals were through personal checks written by WALTERS.

284. In or about 2006, WALTERS gave significant amounts of cash and other items of value to OTR employees. In addition, in or about 2006, WALTERS wrote at least \$431,782.92 in checks from Account No. 5677 to OTR co-workers. In or about 2006, WALTERS also wrote at least \$7,526.00 in checks to OTR co-workers from her checking account at Provident Bank, Account No. 3727.

285. In or about 2006, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$71,133.45 on her Nordstrom's credit

card. Also in or about 2006, and in addition to purchases she made with cash, check, or other financial instruments at Neiman Marcus, WALTERS charged \$232,142.62 on her Neiman Marcus credit card. In or about 2006, WALTERS charged \$143,967.58 on her American Express card. In or about 2006, WALTERS gambled during at least five trips to Las Vegas. In or about June 2006, ALEXANDER was married at the Paris Hotel, in Las Vegas. WALTERS paid for the wedding reception and for a number of the guests' hotel rooms.

2007

286. In or about February 2007, BOA learned that JONES was making a large number of high-dollar withdrawal transactions in TURNBULL's BOA accounts when TURNBULL was not present. When he was interviewed by BOA, JONES said TURNBULL authorized him to conduct withdrawal transactions on her behalf. Accordingly, JONES withdrew money from TURNBULL's accounts without obtaining TURNBULL's signature on the withdrawal paperwork, and, instead, JONES would write "per customer request" on the signature line. After obtaining the funds, JONES would wait for TURNBULL or one of TURNBULL's designees to pick up the funds, or he would deliver the funds personally to TURNBULL.

287. JONES told BOA that TURNBULL gave him \$145,000.00 to assist him in paying off some debts. He also provided to BOA a signed statement, dated February 2, 2007:

"All transactions I, Walter Jones, have done for Ms. Jayrece Turnbull, was [sic] authorized by the customer. I have done w/d [withdrawal] and other transactions without the customer being present in the office. She have [sic] given me monies (\$145,000 in three months) as gifts."

288. Shortly after interviewing JONES, BOA spoke with TURNBULL, who insisted that she had authorized JONES to conduct the transactions. TURNBULL also stated that BOA did not need to know why she had given JONES money.

289. BOA terminated JONES on February 2, 2007 for violating employee standards of conduct by accepting gifts from customers.

290. With JONES unable to help his co-conspirators deposit fraudulently obtained checks and distribute the proceeds of the scheme, it was considerably more difficult for WALTERS to gain access to funds from fraudulent property tax refund vouchers.

291. WALTERS tried to adapt to JONES's ouster in at least three ways. First, compared with the immediately preceding years, she expanded the group of people to whom she gave fraudulent property tax refund checks. Second, WALTERS decreased the average dollar amount of the fraudulent property tax vouchers she was creating. Third, WALTERS instructed co-conspirators to open new corporate accounts into which property tax refund checks could be deposited.

292. Thus, on or about May 25, 2007, at WALTERS's direction, ALEXANDER opened an account at SunTrust Bank in the name of AURORA RE ENTERPRISES, Inc., Account No. 1382. WALTERS instructed ALEXANDER to give the company that name because a company with the letters RE (which suggest "real estate") could be expected to receive large property tax refunds.

293. Similarly, on or about June 7, 2007, at WALTERS's direction, TURNBULL opened an account at SunTrust Bank in the name of FIRST AMERICAN HOME, Account No. 8316. WALTERS believed that few suspicions would be raised at OTR or a bank if a company entitled FIRST AMERICAN HOME received a large property tax refund check.

294. On or about June 6, 2007, GROOMS opened another bank account for AWESOME GRAPHIC DESIGNS, Account No. 3639 at Manufacturers and Traders Trust Company (hereinafter "M&T Bank").

295. In or about 2007, WALTERS and GROOMS embezzled a total of \$398,101.80 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/2/07	VRRE 3537	6694230	ALETHIA GROOMS C/O JEFF NADEL, ESQ HOLD FOR PICK UP	\$84,101.80
5/30/07	VRRE 3782	6764650	AWSOMGRAPHICS [sic] GROUP ATTN: A. GROOMS/CARFRITZ REALTY HOLD FOR PICK UP	\$125,000.00
7/24/07	VRRE 3841	6805520	AWSOMEGRAPHICS, ENTERPRISES C/O GEF F NADEL, ESQ ⁴⁹ HOLD FOR PICJ [sic] UP	\$189,000.00

296. None of those three fraudulent vouchers cited legitimate square and lot combinations found in District of Columbia property records.

297. In or about 2007, WALTERS and ALEXANDER embezzled a total of \$805,490.00 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
5/31/07	VRRE 3787	6770965	AURORA RE ENTERPRISES, LLC C/O WILKES ARTIS, ESQ HOLD FOR PICK UP	\$459,990.00

⁴⁹ An employee in Revenue Accounting changed “GEFF” to “JEFF” before the check was issued.

7/24/07	VRRE 3842	6805521	AURORA R.E. ENTERPRISES, INC CC/O ⁵⁰ JEFF NADEL, ESQ 8700 GEORGIA AVENUE SILVER SPRING, MD 20815	\$345,500.00
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298. In or about February 2007, WALTERS brought YOON into the scheme. WALTERS had met YOON in or about 2000, when YOON was selling Louis Vuitton merchandise in Tysons Corner, Virginia, where WALTERS was a frequent customer. WALTERS and YOON developed a friendship above and beyond YOON's role as WALTERS's personal shopper at Neiman Marcus. Between June 2005 and May 2006, WALTERS gave YOON approximately \$251,130.00 in gifts. Those funds were proceeds of WALTERS's scheme.

299. In or about February 2007, having created another fraudulent property tax refund voucher, VRRE 3513, WALTERS gave YOON a \$483,940.00 District of Columbia check, Check No. 6685162, that was made payable to RL Real Estate Corp. The secondary payee on the check was Corporation Two, a company owned by Individual Seven, a close relative of YOON. YOON attempted to cash the check at a branch of Chevy Chase Bank in Rockville, Maryland. However, given that the check had two payee names, and that Corporation Two had no relationship to RL Real Estate Corp, officials at Chevy Chase Bank refused to accept the check for deposit.

300. In or about April 2007, WALTERS gave YOON a second check, Check No. 6741805, in the amount of \$275,000.00, that was made payable to Corporation Two. Individual Seven deposited the check into Corporation Two's account.

⁵⁰ An employee in Revenue Accounting changed "CC/O" to "C/O" before the check was issued.

301. In or about June 2007, WALTERS directed YOON to use \$125,000.00 of the \$275,000.00 to purchase a cashier's check made payable to HELMET'S PLUMBING. YOON did as WALTERS asked, purchasing Cashier's Check No. 200125291 from Chevy Chase Bank. On or about August 1, 2007, the cashier's check was deposited into RICHARD WALTERS's HELMET'S PLUMBING account at BOA, Account No. 1389.

302. Thus, in or about 2007, WALTERS and YOON embezzled a total of \$275,000.00 from the District of Columbia through one fraudulent property tax refund:

Date	Voucher	Check No.	Payees	Amount
4/21/07	VRRE 3716	6741805	Corporation Two c/o Individual Seven, President	\$275,000.00

303. In or about 2007, WALTERS and RICHARD WALTERS embezzled a total of \$1,031,661.28 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/9/07	VRRE 3515	6694229	HHELMET [sic] COMPANY., INC C/O DAVID FUSS, ESQ HOLD FOR PICKUP	\$490,560.54
5/11/07	VRRE 3755	6756039	HELMET INC, COP [sic] C/O DAVID FUSS, ESQ HOLD FOR PICK UP	\$541,100.74

304. In or about 2007, WALTERS and RICARDO WALTERS embezzled a total of \$1,318,181.90 from the District of Columbia through three fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
1/19/07	VRRE 3514	6685161	SECOND STREET FUNDING C/O PROVIDENTHOME, INC HOLD FOR PICK UP	\$450,683.90

4/5/07	VRRE 3700	6741803	PROVIDENT HOME INC C/O 1440 K STREET, LLC HOLD FOR PICKUP	\$468,000.00
5/31/07	VRRE 3788	6770966	PROVIDENT HOME, LLC C/O JEFF NADEL, ESQ HOLD FOR PICK UP	\$399,498.00

305. In or about 2007, WALTERS and TURNBULL embezzled a total of \$863,680.00 from the District of Columbia through two fraudulent property tax refunds:

Date	Voucher	Check No.	Payees	Amount
2/2/07	VRRE 3538	6727030	CHAPPAHOME. INC, LLC C/O JEFF NADEL ESQ HOLD FOR PICK UP	\$465,000.00
4/21/07	VRRE 3715	6741804	CHAPPAHOME INC C/O WILKES ARTIS, LLC HOLD FOR PICK UP	\$398,680.00

WALTERS’S EFFORTS TO DEFUSE AN INQUIRY FROM SUNTRUST

306. In or about April 2007, WALTERS successfully created another fraudulent property tax refund voucher that was intended for TURNBULL. On or about April 5, 2007, WALTERS prepared and approved VRRE 3701, a fraudulent \$410,000 property tax refund voucher made payable to “FIRST AMERICAN HOME[,] C/O DAVID FUSS, ESQ[,] HOLD FOR PICKUP.” As a result of WALTERS’s fraudulent acts, on or about May 23, 2007, the District of Columbia issued Check No. 6756040, a \$410,000.00 check to those payees.

307. On or about June 18, 2007, TURNBULL deposited Check No. 6756040 into her FIRST AMERICAN HOME account at SunTrust, Account No. 8316.

308. Officials at SunTrust were suspicious of this check and placed a hold on it because they had inadequate documentation of the relationship between the primary payee, TURNBULL's FIRST AMERICAN HOME, and the secondary payee, David Fuss, Esquire. On or about June 20, 2007, and thereafter on June 27, 2007, a SunTrust employee spoke with Mr. Fuss and determined that he litigated property tax assessment challenges for commercial property owners. Fuss informed SunTrust that neither FIRST AMERICAN HOME nor TURNBULL was one of his clients.

309. On or about June 25, 2007, TURNBULL wrote a check from her FIRST AMERICAN HOME account in the amount of \$200,000.00 and attempted to deposit it into one of her CHAPA INTERIORS accounts at BOA, Account No. 2467.

310. On or about June 26, 2007, and June 27, 2007, when a SunTrust employee spoke with TURNBULL to ask for business documentation, TURNBULL responded that she would be "on vacation" until September and that she would provide the documents when she returned.

311. On or about June 27, 2007, a SunTrust employee spoke with a representative of BOA to determine whether TURNBULL was a legitimate bank customer of BOA. When asked about the \$410,000.00 check to FIRST AMERICAN HOME, the BOA official stated that TURNBULL had deposited a similar check into her CHAPA INTERIORS account at BOA, Account No. 2467. That check, Check No. 6741804, was, like the \$410,000 check, a District of Columbia check drawn on BOA Account No. 2547. Check No. 6741804 was in a similar amount—\$398,680.00—but for a different payee: "Chappahome Inc. C/O Wilkes Artis, LLC."

312. On or about June 27, 2007, SunTrust contacted OTR and inquired about the legitimacy of Bank of America Check No. 6756040 and Check No. 6741804. An employee in OTR's Customer Service Center left a voicemail for WALTERS asking why FIRST AMERICAN

HOME and CHAPPAHOME received District of Columbia checks. WALTERS later responded to the OTR Customer Service Center employee that these companies were involved in tax sales.

313. WALTERS became concerned that her scheme to steal funds from the District of Columbia government would be discovered.

314. On or about June 29, 2007, WALTERS forged a memorandum on official stationery from the District of Columbia Office of the Chief Financial Officer, Office of Tax and Revenue. The forged memorandum, which purported to be from one of WALTERS's supervisors, represented that, on the basis of research, the two checks questioned by SunTrust were in fact legitimate:

“[U]pon receiving the request for research the office of [WALTERS's supervisor] has completed research for the two items listed below our findings are:

“In reference to check number 6756040 in the amount of \$410,000.00 and check number 6741804 in the amount of \$398,680.00 along with the supporting documentation shows that these two items were correctly processed in a timely [sic] to the payees on record in which they represent the two entities. Further it was indicated that the payee would be different on the second item which was also confirmed by the Revenue Accounting Administration.”

WALTERS ordered a secretary to sign the memorandum on behalf of WALTERS's supervisor.

WALTERS gave a copy of the memorandum to a member of OTR's Customer Service Center.

315. As a result of WALTERS's forged memorandum, on or about June 29, 2007, an OTR employee informed SunTrust that Bank of America Check No. 6756040 originated from OTR and was a “good check payable to First American Home.” Notwithstanding this information, SunTrust maintained the hold on this check given TURNBULL's failure to provide sufficient documentation establishing TURNBULL's connection to FIRST AMERICAN HOME.

316. On or about July 9, 2007, a SunTrust employee advised TURNBULL that SunTrust needed copies of business tax returns, a business license, and bank references to verify her claim to the funds from the property tax refund in Check No. 6756040. On or about July 10, 2007, SunTrust asked TURNBULL to provide articles of incorporation to prove that she was an authorized agent of FIRST AMERICAN HOME.

317. On or about July 11, 2007, at the Assessor's Office for the Government of Prince George's County, Maryland, and at WALTERS's direction, TURNBULL filed a trade name application for FIRST AMERICAN HOME. On a separate form, TURNBULL represented that FIRST AMERICAN HOME was formed in April 2007. On or about July 12, 2007, TURNBULL forwarded copies of the documents to SunTrust.

318. WALTERS recognized that the problem with SunTrust was not going away, despite WALTERS's efforts to resolve the issue with her phony June 29, 2007, memorandum. On or about September 14, 2007, WALTERS drafted a letter on the same District of Columbia government letterhead used for the forged June 29, 2007, memorandum. The September 14, 2007, letter was addressed to FIRST AMERICAN HOME. It stated:

“Ms. Jayrece Turnbull, representative for First American Home, has been registered as a tax sale purchaser for several years with the Office of Tax and Revenue, Real Property Tax Administration.”

WALTERS forged the signature of the manager of the OTR tax sale unit.

319. On or about September 14, 2007, WALTERS mailed the OTR tax sale letter in an official District of Columbia government envelope to TURNBULL's home in Maryland. The outside of the envelope read “Official Business Penalty for Misuse.” On or about September 17, 2007, TURNBULL hand delivered the OTR tax sale letter to a SunTrust branch in Laurel, Maryland.

On or about September 25, 2007, a SunTrust employee asked TURNBULL for further documentation for FIRST AMERICAN HOME, such as a tax sale contract or corporate documents that pre-dated the \$410,000.00 check.

320. WALTERS wanted to know if her efforts with respect to the two BOA checks had been successful. In or about the summer of 2007, WALTERS visited Revenue Accounting and OTR's Customer Service Center and inquired about the investigation into these fraudulent checks.

321. WALTERS used GROOMS's graphics expertise in WALTERS's efforts to mislead SunTrust about the fraudulent \$410,000.00 District of Columbia check. In or about September 2007, in an effort to make it appear that TURNBULL's company had made a large deposit for the annual tax sale auction (an amount that TURNBULL could then represent was refunded to FIRST AMERICAN HOME), WALTERS faxed GROOMS a District of Columbia Government Real Property Tax Sale form with writing on it and asked GROOMS to remove the writing. The fax was sent from Washington, D.C. to GROOMS's home in Maryland. WALTERS explained that she needed a blank form for TURNBULL. GROOMS scanned the form onto a computer and deleted the writing from the scanned document. GROOMS delivered the blank form to TURNBULL for TURNBULL to use in connection with the \$410,000.00 check deposit at SunTrust.

322. On or about October 23, 2007, WALTERS and TURNBULL continued to attempt to apply pressure to SunTrust to force the bank to release the funds from the \$410,000.00 fraudulently obtained property tax refund check. On or about October 25, an attorney representing TURNBULL mailed a letter to the manager of SunTrust. The letter stated, in part:

“This letter is to advise you that Ms. Turnbull has gone above and beyond reasonable ability in trying to meet your demands to prove that the funds deposited into her recently opened business account belong to her and her business. * * *

“You are penalizing Ms. Turnbull for a mistake that occurred due [sic] a Sun Trust’s employee’s error. Ms. Turnbull in good faith opened a business account in one of your branches. She did so based on an expectation of good customer service which she has failed to receive. You either need to allow Ms. Turnbull access to the funds in her account or need to return to her the check that was deposited into her account and close the account. * * *

“Ms. Turnbull is a legitimate sole proprietorship with a federal tax identification number. This matter has gone on long enough. You have no legal reason to continue to refuse to release the funds you are holding in Ms. Turnbull’s account. If Ms. Turnbull’s funds are not released to her within five days from the date of this letter, I will advise her what further legal remedies she may pursue against you, including the filing of a complaint with the state and federal agencies that regulate banking institutions. She may also choose to file a lawsuit against you seeking the return of the check and the damages she has suffered.”

WALTERS’S DISCOVERY OF A NEW METHOD FOR EMBEZZLING FUNDS

323. In or about 2007, WALTERS discovered a new way to create fraudulent property tax refunds. In the past, WALTERS used the SOAR system to create fraudulent vouchers, rather than ITS, because ITS only allowed refunds where the credit was already available because data showed that the taxpayer had in fact paid more than what was owed in property taxes. SOAR refunds did not depend on pre-existing credits.

324. The new method WALTERS discovered involved “credit remits,” which involved a process in ITS designed to allow credits that had not been carried over automatically from the preceding computer system to be made available to taxpayers under the new system, ITS. Instead of creating paperwork for a SOAR refund designed to make it appear that a taxpayer was owed a refund based on a court decision or overpayment or change in assessment, WALTERS could use the credit-remit process to give a taxpayer a fraudulent credit and either have the fraudulently obtained refund check mailed directly to a co-conspirator or create a SOAR voucher to draw on the credit.

325. WALTERS used the credit remit process in 2007 to create two fraudulent property tax refunds for POPE.

326. In or about 2005 to 2006, POPE put his name on the mortgage of a property on Otis Place, in Northeast Washington, D.C. that belonged to a friend. In or about 2007, POPE received in the mail at his home on Barnaby Terrace, in Southeast, a District of Columbia property tax bill for his friend's Otis Place address. POPE spoke with WALTERS about the bill.

327. On or about March 6, 2007, WALTERS, using her authority as the manager of RPTAAU in OTR, created false entries in OTR's computer system, ITS, to create a false tax credit for the Otis Place address. Specifically, WALTERS altered the computer entries in ITS to make it appear that a credit of \$83,199.62 was due on the Otis Place address as of October 1, 2003—a period of time when a predecessor computer system to ITS was in place. There was no such credit due on the Otis Place address. Given the changes made by WALTERS, however, the ITS system therefore treated the October 1, 2003, credit as being available on the Otis Place address in 2007.

328. On or about March 7, 2007, the day after WALTERS created the fraudulent ITS credit for the Otis Place address, POPE faxed a letter to OTR requesting a property tax refund for the Otis Place address and requesting that the refund be mailed to his Barnaby Terrace address.

329. POPE's March 7, 2007, letter referenced the square and lot number for the Otis Place property and stated: "I spoke with Ms. Harriet [sic] Walters, Manager, concerning the property referenced above [the Otis Place property], specifically the 2007 assessment. This is a request to have any overage mailed to me, at my address listed below, after payment has been satisfied." The address listed below in the letter was POPE's Barnaby Terrace address.

330. On or about March 14, 2007, WALTERS approved a fraudulent property tax voucher for the Otis Place property—VRRE 3663—in the amount of \$83,199.62. The payee on the voucher was listed as “Samuel Earl Pope,” and the voucher listed the mailing address as POPE’s Barnaby Terrace address. However, WALTERS listed a special code on the voucher to ensure that the resulting refund check would be held for pick up, rather than mailed. WALTERS attached to VRRE 3663 POPE’s March 7, 2007, letter as supporting documentation for the refund request.

331. On or about March 16, 2007, the District of Columbia issued Check No. 6714098 on Bank of America Account No. 2547, a check in the amount of \$83,199.62 made out to POPE and that included his home address on Barnaby Terrace. On or about March 21, 2007, POPE deposited the \$83,199.62 check into BOA Account No. 5864, his personal account.

332. On or about March 16, 2007, the same day the District of Columbia issued a check for the fraudulent property tax refund on the Otis Place property, WALTERS, again using her authority as the manager of RPTAAU, created a false tax credit for POPE’s Barnaby Terrace address. Specifically, she altered the computer entries in ITS fraudulently to create a credit of \$75,000.00 due from the District of Columbia to POPE on his Barnaby Terrace address as of October 1, 2002—a period of time when a predecessor computer system to ITS was in place. There was no such credit due on POPE’s Barnaby Terrace address. Given the changes made by WALTERS, however, the ITS system reflected the October 1, 2002, credit as being available to POPE on the Barnaby Terrace address as of 2007. As discussed below, WALTERS never drew upon this \$75,000 credit.

333. On or about March 28, 2007, despite having created a fraudulent credit in ITS directly for POPE’s Barnaby Terrace address, WALTERS used her authority as the manager of RPTAAU to create a false tax credit for another address on Barnaby Terrace (hereinafter “the Other Barnaby

Terrace address”), a home fewer than 400 yards down the street from POPE’s Barnaby Terrace address. Specifically, WALTERS altered the computer entries in ITS to make it appear that a credit of \$75,242.31 was due from the District of Columbia to the owner of the Other Barnaby Terrace address as of October 1, 2002—a period of time when a predecessor computer system to ITS was in place. There was no such credit due on the Other Barnaby Terrace address. Given the changes made by WALTERS, however, the ITS system therefore treated the October 1, 2002, credit as being available on the Other Barnaby Terrace address in 2007.

334. On or about April 5, 2007, WALTERS created a property tax refund voucher in ITS—Voucher No. 07R1398—in the amount of \$75,242.31 for the other Barnaby Terrace address.

335. As a result of WALTERS’s creation of the false credit for the Other Barnaby Terrace address and Voucher No. 07R1398, on or about April 6, 2007, the District of Columbia issued Check No. 1714924 on Bank of America Account No. 2547, a check in the amount of \$75,242.31 made out to the last name and known address of the taxpayer associated with the Other Barnaby Terrace address. Thus, on or about April 6, 2007, Check No. 1714924 was mailed by the United States Postal Service to an address in Silver Spring, Maryland—the address on file in ITS for the owner of the Other Barnaby Terrace address. That mailing was foreseeable to WALTERS and POPE.

336. Rather than cashing the check, on or about April 17, 2007, the owner of the Other Barnaby Terrace address came to OTR with a copy of Check No. 1714924 and stated that the owner was not owed a property tax refund of \$75,242.31 from the District of Columbia.

337. On or about April 23, 2007, one of the employees WALTERS supervised completed a District of Columbia government form titled, “Application for Stop Check Payment (Statement of Claimant).” The form has handwritten notes stating “Reissue check” and “Stop check sent to wrong address.” The form reflects the name of the property owner for the Other Barnaby Terrace address.

338. Check No. 1714924 to the owner of the Other Barnaby Terrace address was cancelled, and the \$75,242.31 credit for that address was reinstated and available in ITS for a refund.

339. On or about May 1, 2007, WALTERS approved a second fraudulent property tax voucher for POPE in 2007—VRRE 3734. This fraudulent refund was in the amount of \$75,242.31.⁵¹ The payee on the voucher was listed as “Samuel Pope[,] HOLD-FOR-PICK-UP.”

340. Significantly, although VRRE 3734 listed POPE as the taxpayer, the voucher drew on the \$75,242.31 credit listed in ITS for the Other Barnaby Terrace address, not the \$75,000 fraudulent credit WALTERS had created for POPE’s Barnaby Terrace address on March 16, 2007.

341. As a result of WALTERS’s creation of the false credit for the Other Barnaby Terrace address, and her creation of VRRE 3734, on or about May 2, 2007, the District of Columbia issued Check No. 6744522 on Bank of America Account No. 2547, a check in the amount of \$75,242.31 made out to “Samuel Pope.” On or about July 2, 2007, POPE deposited the \$75,242.31 District of Columbia property tax refund check into BOA Account No. 4667, his Southwest Business Center account. The back of the negotiated check bears POPE’s signature.

342. In or about 2007, WALTERS and POPE thus embezzled a total of \$158,441.93 from the District of Columbia through two fraudulent property tax refunds:

⁵¹ The original version of VRRE 3734 typed by WALTERS states that the amount owed to POPE was \$7,524,231.00. That amount was crossed out, and \$75,242.31 was handwritten on the form.

Date	Voucher	Check No.	Payees	Amount
3/14/07	VRRE 3663	6714098	SAMUEL EARL POPE	\$83,199.62
5/12/07	VRRE 3734	6744522	SAMUEL POPE	\$75,242.31

* * *

343. On six occasions in or about 2007, WALTERS created two fraudulent property tax refund vouchers on the same day:

Date Created	Vouchers	Date(s) Checks Issued	Depositor Account(s)	Date(s) Deposited
1/19/07	VRRE 3513	1/26/07	(Rejected by Chevy Chase Bank)	n/a
	VRRE 3514		PROVIDENT HOME 0064	2/6/07
2/2/07	VRRE 3537	2/13/07	AWESOME GRAPHICS 3639	2/16/07
	VRRE 3538	4/5/07	CHAPA INTERIORS 2467	4/10/07
4/5/07	VRRE 3700	4/26/07	PROVIDENT HOME 0064	5/9/07
	VRRE 3701	5/23/07	FIRST AMERICAN HOME 8316	6/19/07
4/21/07	VRRE 3715	4/26/07	CHAPA INTERIORS 2467	5/4/07
	VRRE 3716		Corporation Two 0175	5/2/07
5/31/07	VRRE 3787	6/15/07	AURORA RE 1382	6/18/07
	VRRE 3788		PROVIDENT HOME 0064	6/17/07
7/24/07	VRRE 3841	8/9/07	AWESOME GRAPHICS 3639	8/16/07
	VRRE 3842		AURORA RE 1382	8/16/07

344. In sum, in or about 2007, WALTERS created seventeen fraudulent property tax refunds.⁵² As a result, in or about 2007, WALTERS and her co-conspirators embezzled at least \$4,850,556.91 from the District of Columbia through their scheme.

345. In or about 2007, \$1,468,090.92 was deposited into WALTERS's primary banking account, Account No. 5677 at BOA.

346. In or about 2007, WALTERS withdrew \$1,592,741.83 from Account No. 5677 through ATM withdrawals, cash-out transactions, personal checks, check card purchases, electronic bill payments, and counter withdrawals.⁵³ Of that amount, \$981,665.21 or nearly 62 percent of the withdrawals were through personal checks written by WALTERS.

347. In or about 2007, WALTERS gave significant amounts of cash and other items of value to OTR employees. In addition, in or about 2007, WALTERS wrote at least \$129,705.00 in checks from Account No. 5677 to OTR co-workers. In or about 2007, WALTERS also wrote at least \$15,000.00 in checks to OTR co-workers from her checking account at Provident Bank, Account No. 3727. Finally, in or about 2007, WALTERS wrote at least \$8,300.00 in checks to OTR co-workers from her checking account at PNC Bank, Account No. 1398.

348. In or about 2007, and in addition to purchases she made with cash, check, or other financial instruments at Nordstrom's, WALTERS charged \$80,144.62 on her Nordstrom's credit card. Also in or about 2007, and in addition to purchases she made with cash, check, or other financial instruments at Neiman Marcus, WALTERS charged \$120,065.40 on her Neiman Marcus

⁵² As noted above, the checks for VRRE 3701 (\$410,000.00 to FIRST AMERICAN HOME) and VRRE 3513 (\$483,940.00 to R.L. Real Estate Corp, c/o Corporation Two) were not successfully deposited.

⁵³ WALTERS was able to withdraw more from Account No. 5677 than what she deposited into that account in 2007 because of her remaining balance on December 31, 2006.

credit card. In or about 2007, WALTERS charged \$79,455.68 on her American Express card. In or about 2007, WALTERS gambled during at least two trips to Las Vegas, five trips to Atlantic City, and one trip to Charlestown, West Virginia.

349. Following conversations in or about 1990 with PATRICIA STEVEN, whose husband, ROBERT STEVEN, was an IRS employee, WALTERS knew that she had to report on her federal and District of Columbia income tax returns the moneys she was embezzling from the District of Columbia through her scheme.

350. For tax years 2002 through 2007, WALTERS willfully attempted to evade and defeat her federal income taxes due and owing. To hide her scheme, WALTERS failed to declare all her income on her federal income tax returns by not reporting the income she was receiving through fraudulent property tax refund vouchers. Thus, in those years, WALTERS had significant tax payments due and owing:

- For tax year 2002, WALTERS reported \$72,976.00 in income for federal tax purposes. WALTERS's actual taxable income was \$3,376,310.00. Her federal tax due and owing was thus \$1,243,579.00.⁵⁴
- For tax year 2003, WALTERS reported \$57,198.00 in income for federal tax purposes. WALTERS's actual taxable income was \$4,853,667.00. Her federal tax due and owing was thus \$1,654,363.00.
- For tax year 2004, WALTERS reported \$80,412.00 in income for federal tax purposes. WALTERS's actual taxable income was \$8,390,319.00. Her federal tax due and owing was thus \$2,879,685.00.
- For tax year 2005, WALTERS reported \$73,786.00 in income for federal tax purposes. WALTERS's actual taxable income was \$7,163,131.00. Her federal tax due and owing was thus \$2,453,747.00.

⁵⁴

These numbers do not include any interest or penalties.

- For tax year 2006, WALTERS reported \$81,320.00 in income for federal tax purposes. WALTERS's actual taxable income was \$7,792,074.00. Her federal tax due and owing was thus \$2,669,491.63.
- For tax year 2007, WALTERS's actual taxable income was \$5,804,246.00.⁵⁵ Her federal tax due and owing was thus \$1,996,899.00.

351. In sum, for tax years 2002 through 2007, WALTERS willfully attempted to evade and defeat \$12,993,181.00 in federal taxes due and owing.

352. For tax years 2002 through 2007, WALTERS willfully attempted to evade and defeat her District of Columbia income taxes due and owing. To hide her scheme, WALTERS failed to declare all her income on her District of Columbia income tax returns by failing to report the income she was receiving through fraudulent property tax refund vouchers. Thus, in those years, WALTERS had significant tax payments due and owing:

- For tax year 2002, WALTERS reported \$85,875.00 in income for District of Columbia tax purposes. WALTERS's actual taxable income was \$3,377,639.64. Her District of Columbia tax due and owing was thus \$299,886.48.
- For tax year 2003, WALTERS reported \$88,395.00 in income for District of Columbia tax purposes. WALTERS's actual taxable income was \$4,835,474.55. Her District of Columbia tax due and owing was thus \$438,637.13.
- For tax year 2004, WALTERS reported \$96,108.00 in income for District of Columbia tax purposes. WALTERS's actual taxable income was \$8,388,332.34. Her District of Columbia tax due and owing was thus \$764,624.90.
- For tax year 2005, WALTERS reported \$101,892.00 in income for District of Columbia tax purposes. WALTERS's actual taxable income was \$7,149,371.71. Her District of Columbia tax due and owing was thus \$629,505.36.
- For tax year 2006, WALTERS reported \$106,101.00 in income for District of Columbia tax purposes. WALTERS's actual taxable income was \$7,786,122.17. Her District of Columbia tax due and owing was thus \$662,832.62.

⁵⁵ WALTERS, who has been confined since in or about November 2007, did not file a tax return for 2007.

- For tax year 2007, WALTERS's actual taxable income was \$5,806,728.26. Her District of Columbia tax due and owing was thus \$487,941.78.

353. In sum, for tax years 2002 through 2007, WALTERS willfully attempted to evade and defeat \$3,283,428.27 in District of Columbia taxes due and owing.

354. SunTrust, BOA, Provident Bank, PNC Bank, M&T Bank, Chevy Chase Bank, and their respective predecessor companies were financial institutions insured by the Federal Deposit Insurance Corporation.

DEFENDANT'S ACCEPTANCE

I have read every word of this 114-page Statement of the Offenses. Pursuant to Rule 11 of the Federal Rules of Criminal Procedure, and after consulting with my attorney, I agree and stipulate to this Statement of the Offenses. Furthermore, I declare under penalty of perjury that the facts in the foregoing Statement of the Offenses are true and correct. For all but a very small number of background facts described herein, I have personal knowledge; I have come to learn about the remaining facts by reviewing documents and other evidence.

Executed on: _____, __, 2008 _____/copy/_____
Harriette M. Walters
Defendant

I have discussed this Statement of the Offenses with my client, Harriette M. Walters. I concur with her decision to stipulate to this Statement of the Offenses.

Date: _____ _____/copy_____
Steven C. Tabackman, Esquire
Counsel for Ms. Walters