

FILED

JUL 26 2017

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

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

UNITED STATES OF AMERICA)
)
 v.)
)
 TANYA LEE ENGLISH,)
 a/k/a TANYA LEE ROBERTS)
)
)
)
)

CR. NO. 2:17cr338-WKW
[18 U.S.C. § 1343;
18 U.S.C. § 1028A]

INDICTMENT

The Grand Jury charges:

INTRODUCTION

1. At all times material to this Indictment:
 - a. Regions Bank, MetaBank, Sunrise Bank, Bancorp Bank, and Central National Bank & Trust Company are all banks, which issue prepaid credit cards.
 - b. E-Bay is an e-commerce corporation that helps facilitate online consumer-to-consumer and business-to-consumer sales. E-Bay's headquarters are in San Jose, California.
 - c. PayPal is a worldwide online payments system that supports online money transfers and serves as an electronic alternative to traditional paper methods like checks and money orders. The majority of PayPal's servers used to process these electronic transactions are located between Las Vegas, Nevada; Phoenix, Arizona; and Salt Lake City, Utah. PayPal does not have any servers in the Southeast region of the United States.
 - d. Craigslist is a classified advertisements website with sections listing jobs, housing, personals, for sale, items wanted, services, community, résumés, and discussion forums. Craigslist's headquarters are in San Francisco, California.

COUNTS 1 - 10

(Wire Fraud)

THE SCHEME TO DEFRAUD

1. From on or about a date unknown to on or about February 27, 2017, the defendant

TANYA LEE ENGLISH,
a/k/a "Tanya Lee Roberts,"

devised and intended to devise a scheme to defraud individuals using PayPal, E-Bay, and Craigslist, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

2. It was part of the scheme to defraud that the defendant would and did as follows:

- a. The defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," would advertise on E-Bay or Craigslist that she had high-end baby strollers, such as "UPPAbaby Vista" and "Bugaboo Donkey" strollers for sale.

- b. In her posting, the defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," would list her contact information, a picture of the stroller, and a description of the stroller's condition. She would list the stroller at a price lower than the usual retail price or have potential buyers bid on the stroller.

- c. When the defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," and a potential buyer agreed on the terms of the sale, the defendant would require them to make payment using PayPal's "Friends and Family" payment option.

- d. After the buyer deposited the money into the defendant's, PayPal account, the defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," would not ship the stroller to the buyer and have no further contact with them. PayPal would eventually refund the

buyers' money because they were a victim of fraudulent activity.

e. The defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," deposited the money she received from the buyers in her PayPal account onto prepaid credit cards, also referred to as General Purpose Reloadable (GPR) cards, and used these to make ATM withdrawals or make purchases.

f. The defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," would also use PayPal accounts created with stolen personal identification information of unsuspecting individuals as part of her scheme.

3. On or about the dates listed below, in Montgomery County, in the Middle District of Alabama, and elsewhere for the purpose of executing or attempting to execute the previously described scheme to defraud, the defendant,

TANYA LEE ENGLISH,

a/k/a

"Tanya Lee Roberts,"

knowingly caused or attempted to cause to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds as described below:

Count	Date of Wire Transaction	Description of Wire Communication
One	August 29, 2016	The defendant opened a Sunrise Bank account online.
Two	November 11, 2016	\$475 payment for UPPAbaby Stroller received into PayPal account ending in 91332 created under the name of K.H.
Three	November 12, 2016	PayPal account ending in 91332 created under the name of K.H. used to purchase a Men's Distressed Denim Jeans on E-Bay for \$428.01.
Four	November 16, 2016	\$500 PayPal payment by N.F. for a 2015 UPPAbaby Vista Stroller with Rumble Seat and accessories.
Five	November 28, 2016	\$550 PayPal payment by H.W. for an UPPAbaby Vista Stroller.
Six	December 11, 2016,	E-Bay Member to Member Message sent by buyer regarding a Bugaboo Donkey Duo stroller for twins, Item #282288185618.
Seven	December 12, 2016	\$725 payment for 2015 Bugaboo Donkey Duo stroller received into PayPal account ending in 88302 created under the name of J.N.
Eight	December 12, 2016	PayPal account ending in 88302 created under the name of J.N.

		used to purchase a pair of Nike Air Jordans on E-Bay for \$369.
Nine	December 14, 2016	E-Bay Member to Member Message sent by defendant to buyer regarding a Bugaboo Donkey Duo stroller for twins, Item #282288185618.
Ten	January 29, 2017	Approximately \$300 payment by R.B. to defendant for an UPPAbaby Vista Stroller.

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

COUNT ELEVEN

(Aggravated Identity Theft)

On or about November 11, 2016, in the Middle District to Alabama, and elsewhere the defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," did knowingly transfer, possess and use a means of identification of an actual person known to the grand jury, as K.H., without lawful authority, during and in relation to the offense charged in this Indictment as Count Two, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1028A.

COUNT TWELVE

(Aggravated Identity Theft)

On or about December 12, 2016, in the Middle District to Alabama, and elsewhere the defendant, TANYA LEE ENGLISH, a/k/a "Tanya Lee Roberts," did knowingly transfer, possess and use a means of identification of an actual person known to the grand jury, as J.N., without lawful authority, during and in relation to the offense charged in this Indictment as Count Seven, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Sections 1028A.

FORFEITURE ALLEGATION - 1

A. The allegations contained in Counts 1 through 10 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

B. Upon conviction of the offense in violation of Title 18, United States Code, Section 1343, set forth in Counts 1 through 10 of this indictment, the Defendant,

TANYA LEE ENGLISH,
a/k/a "Tanya Lee Roberts,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said violation, including, but not limited to, the following:

Judgment in the amount of 119,550.51.

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

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

the United States shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c).

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

A TRUE BILL:



Foreperson

A. CLARK MORRIS
ACTING UNITED STATES ATTORNEY



Denise O. Simpson
Assistant United States Attorney



Kevin P. Davidson
Assistant United States Attorney