

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v. ZANTHIA WOODARD (A.K.A. ZANTHIA FINLEY) JENEA CRUZ JORDAN SHEAD SORLETTA CAPRI SHEAD</p> <p>Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>CYNTHIA COFFMAN, Attorney General MICHAEL W. MELITO* Senior Assistant Attorney General 1300 Broadway, 9th Floor Denver, CO 80203 720 508 6702 Registration Number: 36059 *Counsel of Record</p>	<p>Grand Jury Case No.: 14CR01</p> <p>Ctrlm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

Of the 2014-2015 term of the Denver District Court in the year 2015; the 2014 - 2015 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

- COUNT 1: Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering- Participation in Enterprise, §18-17-104(3) and §18-17-105 C.R.S. (F2) **37284**
- COUNT 2: Violation of the Colorado Organized Crime Control Act – Conspiracy, §18-17-104(4) C.R.S. (F2) **37285**
- COUNT 3: Identity Theft, §18-5-902(1)(a) C.R.S. (F4) **1307G**
- COUNT 4: Identity Theft, – Possess with Intent to Use, §18-5-902(1)(b) C.R.S. (F4) **1307H**
- COUNT 5: Identity Theft – Alter or Make a Written Instrument or Financial Device, §18-5-902(1)(c) C.R.S. (F4) **1307J**
- COUNT 6: Identity Theft, §18-5-902(1)(a) C.R.S. (F4) **1307G**
- COUNT 7: Conspiracy to Commit Identity Theft, §18-5-902(a) C.R.S.; §18-2-201 (F5) **CON**
- COUNT 8: Identity Theft – Possess with Intent to Use, §18-5-902(1)(b) C.R.S. (F4) **1307H**
- COUNT 9: Conspiracy to Commit Identity Theft, – Possess with Intent to Use, §18-5-902(1)(b) C.R.S.; §18-2-201 C.R.S. (F5) **CON**
- COUNT 10: Identity Theft – Alter or Make a Written Instrument or Financial Device, §18-5-902(1)(c) C.R.S. (F4) **1307J**

- COUNT 11: Conspiracy to Commit Identity Theft– Alter or Make a Written Instrument or Financial Device, §18-5-902(1)(c) C.R.S.; §18-2-201 C.R.S. (F5) **CON**
- COUNT 12: Computer Crime – Unauthorized Access, §18-5.5-102(1)(a) C.R.S. (M2) **1502I**
- COUNT 13: Identity Theft – Possess with Intent to Use, §18-5-902(1)(b) C.R.S. (F4) **1307H**
- COUNT 14: Identity Theft, C.R.S. §18-5-902(1)(a) C.R.S. (F4) **1307G**
- COUNT 15: Identity Theft – Alter or Make a Written Instrument or Financial Device, §18-5-902(1)(c) C.R.S. (F4) **1307J**
- COUNT 16: Aiding or Assisting in the Filing of a Fraudulent or False Tax Return, §39-21-118(5) C.R.S. (F5)
- COUNT 17: Filing a False Tax Return, §39-21-118(4) C.R.S. (F5) **40024**
- COUNT 18: Conspiracy to Commit Filing a False Tax Return, §39-21-118(4) C.R.S.; §18-2-201 C.R.S. (F6) **CON**
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- COUNT 21: Theft - \$20,000 Or More, §18-4-401(1),(2)(d) C.R.S. (F3) **0801V**
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COUNT 31: Computer Crime – Scheme /Defraud – More than \$20,000 but less than \$100,000,
§18-5.5-102(1)(b) C.R.S (F4) **1502T**

COUNT 32: Attempt To Influence A Public Servant, §18-8-306 C.R.S. (F4) **24051**

COUNT 33: False Statement, §8-81-101(1)(a) C.R.S. (Unclassified Misdemeanor)

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COUNT 1

Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering- Participation in Enterprise, §18-17-104(3) and §18-17-105 C.R.S. (F2) **37284**

On or about and between June 1, 2012 and March 30, 2014, in and triable in the State of Colorado, **Zanthia Woodard, Jordan Shead, Sorletta Shead, Jenea Cruz**, and others both known and unknown, while employed by or associated with an enterprise, namely a group of individuals associated in fact, although not a legal entity, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity: in violation of section 18-17-104(3) and section 18-17-105, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 2

Violation of the Colorado Organized Crime Control Act – Conspiracy, §18-17-104(4), C.R.S. (F2) **37285**

On or about and between June 1, 2012 and March 30, 2014, in and triable in the State of Colorado, **Zanthia Woodard, Jordan Shead, Sorletta Shead, Jenea Cruz** and others both known and unknown, did unlawfully, knowingly, and feloniously conspire to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity in violation of C.R.S. section 18-17-104(4) and section 18-17-104(3), C.R.S., and against the peace and dignity of the People of the State of Colorado.

Counts Three through Thirty Six (but Count 33 False Statement, § 8-81-101(1)(a) is not intended to be included as a predicate act) set forth the relevant acts of racketeering activity and are hereby incorporated in Counts One and Two, by this reference. The relevant acts of racketeering activity include any lesser-included offenses of Counts Three through Thirty Six (but Count 33 False Statement, section 8-81-101(1)(a), C.R.S. is not intended to be included as a predicate act). The offenses alleged in Counts One and Two were committed in the following manner:

The Enterprise

The enterprise alleged in Counts One and Two consist of a group of individuals, associated in fact, and multiple legal entities. The enterprise included, the following associated in fact individuals, a group of individuals, along with legal entities and/or other entities:

Zanthia Woodard, Jordan Shead, Sorletta Shead, Jenea Cruz, Charizma Beauty Salon, Joy House Daycare, Mi Popito, Casual Cuisine and Piglet's Soul Food and others both known and unknown to the Grand Jury, who were associated from time to time in the racketeering activity that was related to the conduct of the enterprise.

In general, the members of the enterprise engaged in an identity theft scheme to steal from federal and state taxing authorities and from the Colorado Department of Labor and Employment ("CDLE"). The members of the enterprise filed over one hundred fifty fraudulent federal and state tax filings using information obtained from victims under the false premise of providing a legitimate tax preparation service. With the appearance of legitimacy in place, many victims were tricked into providing the various members of the enterprise with their tax and personal identification information ("PII"). Once in the possession of the tax information and PII, the members of the enterprise

fraudulently inflated tax filings with false financial information from non-existent business entities and bogus W-2 income from these same businesses.

Specifically, members of the enterprise used bogus or dead businesses including but not limited to Charizma Beauty Salon, Joy House Daycare, Mi Popito, Casual Cuisine and Piglet's Soul Food in order to carry out their frauds on government entities including the Colorado Department of Revenue and the Colorado Department of Labor.

By filing more than one hundred and fifty false tax returns, the members of the enterprise unsuccessfully attempted to steal approximately \$94,000 from the Colorado Department of Revenue. Due to the diligence of the Department of Revenue Discovery Section staff, the group of co-conspirators largely failed in their scheme and only defrauded the Department of Revenue of funds nearing \$8,000.00. However, the members of the enterprise were substantially more successful in defrauding federal taxing authorities of over eight hundred thousand dollars.

Furthermore, at least one of the members of the enterprise used the above mentioned PII to commit further crimes including acts of fraud against Wells Fargo Bank and the CDLE. In addition to using the PII of the tax return filers, the PII of family and friends was used to file false unemployment insurance claims with the CDLE totaling over \$70,000.

The identity theft scheme and corresponding theft of public benefits and tax dollars allowed some members of the enterprise -who lived in public housing and falsely claimed low incomes- to use the proceeds of their crime to obtain high end clothing and accessories, take vacations, gamble in Black Hawk, lease vehicles, steal cable, obtain cell phone services and purchase expensive electronics.

In essence, the above persons that associated with the enterprise were involved in several illegal activities that were directly incorporated with their larger schemes including: Theft, Attempted Theft, Conspiracy to Commit Theft, Filing a False Tax Return, Aiding or Assisting in the Filing of a False Tax Return, Computer Crime, Conspiracy to Commit Computer Crime, Identity Theft, Conspiracy to Commit Identity Theft, Forgery, and Attempt to Influence a Public Servant.

Pattern of Racketeering Activity

For purposes of Counts One and Two, Zanthia Woodard, Jordan Shead, Sorletta Shead, Jenae Cruz and others both known and unknown to the Grand Jury, directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses as permitted in §18-17-103, related to the conduct of the enterprise, with at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Conspiracy to Commit the Filing of a False Tax Return, Filing a False Tax Return Aiding or Assisting in the Filing of a Fraudulent or False Tax Return, Forgery, Theft, Attempted Theft, Conspiracy to Commit Theft, Computer Crime, Conspiracy to Commit Computer Crime, Identity Theft, Conspiracy to Commit Identity Theft and Attempt to Influence a Public Servant.

RACKETEERING ACTIVITY

The acts of racketeering activity that the above named persons and/or entities committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses permitted to be used as predicates under this statute:

Counts Three through Thirty Six (but Count 33 False Statement, section 8-81-101(1)(a), C.R.S. is not included as a predicate act) set forth the essential relevant acts of racketeering and are incorporated in these Counts One and Two by this reference. The relevant acts of racketeering activity include any lesser included offenses of Counts Three through Thirty Six (but Count 33 False Statement, section 8-81-101(1)(a), C.R.S. is not included as a predicate act) and, if applicable, any other identified Predicate Acts.

COUNT 3

Identity Theft, §18-5-902(1)(a) C.R.S. (F4) **1307G**

On or about and between June 1, 2012 and March 30, 2014, in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of **SABRINA CARTER, JENNA BRYANT, FRANCIS CAMPBELL, BRANDON MOORE, KIRA WOODWARD, AUTUMN SYMONE LACROSBY, ABOUBCAR (“ALEX”) BALLO and or INDYA HENDERSON** without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 4

Identity Theft – Possess with Intent to Use, §18-5-902(1)(b) C.R.S. (F4) **1307H**

On or about and between June 1, 2012 and March 30, 2014, in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **SABRINA CARTER, JENNA BRYANT, FRANCIS CAMPBELL, BRANDON MOORE, KIRA WOODWARD, AUTUMN SYMONE LACROSBY, ABOUBCAR (“ALEX”) BALLO and or INDYA HENDERSON** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 5

Identity Theft – Alter or Make a Written Instrument or Financial Device,
§18-5-902(1)(c) C.R.S. (F4) **1307J**

On or about and between June 1, 2012 and March 30, 2014, in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of **SABRINA CARTER, JENNA BRYANT, FRANCIS CAMPBELL, BRANDON MOORE, KIRA WOODWARD, AUTUMN SYMONE LACROSBY, ABOUBCAR (“ALEX”) BALLO and or INDYA HENDERSON**; in violation of section 18-5-902(1)(c), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 6

Identity Theft, §18-5-902(1)(a), C.R.S. (F4) **1307G**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of **MIGUEL SOTO, JORGE NUNEZ and or KATHERINE KOZIK** without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 7

Conspiracy to Commit Identity Theft, §18-5-902(1)(a) C.R.S.; §18-2-201 C.R.S. (F5) **CON**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, with the intent to promote or facilitate the commission of the crime of Identity Theft, unlawfully and feloniously agreed with one another that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-5-902(a) and 18-2-201, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 8

Identity Theft – Possess with Intent to Use, §18-5-902(1)(b) C.R.S. (F4) **1307H**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **MIGUEL SOTO, JORGE NUNEZ and or KATHERINE KOZIK** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 9

Conspiracy to Commit Identity Theft, – Possess with Intent to Use,
§18-5-902(1)(b) C.R.S.; §18-2-201 C.R.S. (F5) **CON**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, with the intent to promote or facilitate the commission of the crime of Identity Theft – Possess with the Intent to Use, unlawfully and feloniously agreed with one another that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-5-902(1)(b) and 18-2-201, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 10

Identity Theft – Alter or Make a Written Instrument or Financial Device,
§18-5-902(1)(c) C.R.S. (F4) **1307J**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of **MIGUEL SOTO, JORGE NUNEZ and or KATHERINE KOZIK**; in violation of section 18-5-902(1)(c), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 11

Conspiracy to Commit Identity Theft – Alter or Make a Written Instrument or Financial Device,
§18-5-902(1)(c) C.R.S.; §18-2-201 C.R.S. (F5) **CON**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, with the intent to promote or facilitate the commission of the crime of Identity Theft – Alter or Make a Written Instrument or Financial Device, unlawfully and feloniously agreed with one another that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-5-902(1)(c) and 18-2-201, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 12

Computer Crime – Unauthorized Access, §18-5.5-102(1)(a) C.R.S. (M2) **15021**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, unlawfully and knowingly accessed, exceeded authorized access to, or used a computer, computer network, or computer system, or any part thereof without authorization or in excess of authorized access; in violation of section 18-5.5-102(1)(a) C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 13

Identity Theft – Possess with Intent to Use, §18-5-902(1)(b) C.R.S. (F4) **1307H**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard** unlawfully, feloniously, and knowingly possessed the personal identifying information, financial identifying information, or financial device of **MARTHA HERNANDEZ, THOMAS SPALDING, DORENE REESER, SUZETTE ZAMBON, STEPHANIE DE LA TORRE, DANIELLE BROWN, CHAI BLAND, DEIDRE NIEMAN, ROSALIA MIRAMONTES, JOYCE FINLEY, EDWARD THOMAS and or LATISHA GARCIA** without permission or lawful authority, with the intent to use or to aid or permit another person to use the information or device to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(b), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 14

Identity Theft, §18-5-902(1)(a) C.R.S. (F4)

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of **STEPHANIE DE LA TORRE and or ROSALIA MIRAMONTES** without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 15

Identity Theft – Alter or Make a Written Instrument or Financial Device,
§18-5-902(1)(c) C.R.S. (F4) **1307J**

On or about and between January 1, 2014 and March 30, 2014, in the State of Colorado, **Zanthia Woodard and Jenae Cruz**, unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of **STEPHANIE DE LA TORRE and or ROSALIA MIRAMONTES**; in violation of section 18-5-902(1)(c), C.R.S., and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in substantive Counts 3 through 15 include all facts referenced throughout this document, occurred in the State of Colorado, are hereby incorporated by reference as a predicate acts for Counts 1 and 2 and were committed in the following manner:

Between the years of 2010 and 2012 Jenae Cruz and Zanthia Woodard met one another while working together as employees at Echosphere (Dish Network). During the second quarter of 2012 Ms. Cruz began working at Wells Fargo Bank as a personal banker with employment duties that included opening customer accounts. The amount of accounts Ms. Cruz opened directly impacted her salary bonus and promotion potential with Wells Fargo Bank. Wells Fargo policy required Ms. Cruz to have a face to face meeting or face to face contact prior to opening the accounts for her clientele.

In the fall of 2013 until late spring of 2014 Zanthia Woodard worked in the Sprint credit department with access to Personal Identifying Information (PII) located in the company's computer systems. Handwritten notes found during the course of the search warrant execution on her house directly related to Ms. Woodard's employment at Sprint and contained PII of victims. Further, Ms. Woodard obtained several complete credit profiles while working for Sprint. Copies were also found in her residence. Lastly, bills for services obtained by fraud and through acts of identity theft were discovered at Ms. Woodard's home.

Specifically, Ms. Woodard utilized the below victims' PII without full and complete permission or in excess of any granted permission to obtain Comcast service at her residence of 224 E. 52nd Avenue. Indeed, during the execution of the search warrant investigators found: a Comcast bill dated July 5, 2012 in the name of Sabrina Carter; a Comcast bill dated January 29, 2013 found in Brandon Moore's name; a Comcast bill dated November 18, 2012 in Kira Woodard's name (but using the Social Security Number of deceased party named Wilmont Lowes); Comcast bill dated December 16, 2013 found in Jenna Bryant's name (the account had a \$1200 outstanding balance not actually attributable to Ms. Bryant's actions); a Comcast bill dated July 6, 2012 in Autumn Lacrosby's name (Lacrosby is Woodard's neice); a Comcast bill dated July 29, 2013 found in Aboubacar "Alex" Ballo's name; and a Comcast bill dated June 10, 2013 in Indya Henderson's name.

Further, the investigators connected two events involving an individual named Francis Campbell. The investigators discovered that Francis Campbell had purchased a Sprint cell phone in the fall of 2013 after speaking to a female at the Sprint credit department. The investigators learned the connection to Ms. Campbell, in that Zanthia Woodard had used the name Francis Campbell to obtain Comcast service at Woodard's residence.

In January of 2014, Ms. Jenae Cruz assisted her former co-worker Zanthia Woodard in advancing the ongoing identity theft scheme by opening accounts in various individual's names. Specifically, Ms. Cruz exceeded her authorized access to Wells Fargo's computer systems in a manner including but not limited to: creating accounts without direct consent of the account holders; violating the "in-person" meeting requirement prior to opening an account; and by violating other Wells Fargo policies designed to comply with the "USA PATRIOT Act."

At Zanthia Woodard's request Ms. Cruz opened a Wells Fargo bank account in Miguel Soto's name. The bank account for Soto is shown as being formally opened on January 8, 2014 and uses Woodard's daughter, Charisma Finley's address. As a result of Cruz's and Woodard's actions Wells Fargo issued a credit card with a \$1,000 limit. Wells Fargo sent approval documents related to this action directly to Woodard's daughter's address. However, a Barclaycard Visa credit card in Soto's name was denied on February 20, 2014. The denial correspondence was sent to Zanthia Woodard's residence.

Likewise, at Zanthia Woodard's request Ms. Cruz opened a Wells Fargo bank account in Jorge Nunez's name. The bank account for Nunez is shown as being formally opened on January 8, 2014 and uses Woodard's neice, Autumn Lacrosby's address. However, an application for a Capital One credit card was denied on the previous day of January 7th, 2014 and shortly thereafter, Capital One sent the denial correspondence to Zanthia Woodard's residence.

Furthermore, at Zanthia Woodard's request Ms. Cruz opened a Wells Fargo bank account in Katherine Kosik's name but using Zanthia Woodard's address. The bank account for Ms. Kosik is shown as being formally opened on January 8, 2014. However, both a Discover Card and a Wells Fargo credit card in Kosik's name were denied on January 7 and 8 of 2014. The denial correspondence for both credit cards was sent to Zanthia Woodard's residence. Woodard obtained

Ms. Kozik's PII information after she purchased a Sprint cell phone in December of 2013 in Santa Fe, New Mexico. Ms. Kozik observed and overheard the Sprint clerk call Sprint credit during the course of her cell phone purchase.

Once law enforcement officials executed a search warrant on the residence of Zanthia Woodard in March of 2014, they discovered handwritten notes containing PII of victims which directly related to her past employment at Sprint Credit. Those same handwritten notes contained the information of the following Sprint customers: Martha Hernandez, who purchased a Sprint cell phone in Wisconsin on February 9, 2014; Thomas Spalding, who purchased a Sprint cell phone in Orem, Utah on February 13, 2014; Dorene Reeser, who after speaking to an individual in Sprint Credit, purchased a Sprint cell phone in Omaha, Nebraska on January 24, 2014; Suzette Zambon, who purchased a Sprint cell phone in January 2014 in Illinois; Stephanie De La Torre,¹ who after speaking to a female Sprint Credit representative, purchased a Sprint cell phone on January 23, 2014 in Acton, California.

Moreover, during the search of Ms. Zanthia Woodard's home, investigators found complete credit profiles of the following individuals: Danielle Brown, Chai Bland, Deidre Nieman and Rosalia Miramontes.² The search also revealed that Zanthia Woodard obtained cell service in other people's names and possessed a large amount of notes containing her victim's PII including some identities that had not yet been used. Other victims of Zanthia Woodard's enterprise included: her own mother, Joyce Finley, whose identity was used to fraudulently obtain AT&T cell service in February of 2013; Edward Thomas, whose PII was used to open a T-Mobile account (a T-Mobile bill dated July 20, 2013 was found during the search); and Latisha Garcia whose identity was used in attempts to obtain a Target credit card. A denial of that Target credit card application dated November 5, 2013 was sent to Woodard's address.

COUNT 16

Aiding or Assisting in the Filing of a Fraudulent or False Tax Return, §39-21-118(5) C.R.S. (F5)

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, unlawfully, feloniously, and willfully aided or assisted in, or procured, counseled, or advised the preparation or presentation under, or in connection with any matter arising under any title administered by the Department of Revenue, or a return, affidavit, claim, or other document, which is fraudulent or is false as to any material matter, whether or not such falsity or fraud is with the knowledge or consent of the person authorized or required to present such return, affidavit, claim, or document, in violation of section 39-21-118(5), C.R.S., (F5), and against the peace and dignity of the People of the State of Colorado.

COUNT 17

Filing a False Tax Return, §39-21-118(4) C.R.S. (F5) **40024**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, unlawfully, feloniously, and willfully made and subscribed returns, statements, or other documents, which contained or were verified by a

¹ CitiBank MasterCard approved the issuance of a credit card with a \$500 limit in the name of Ms. De La Torre on January 25, 2014 and sent the approval documentation to Woodard's residence. Ms. De La Torre did not grant permission for the issuance of this credit card or for it to be sent to Ms. Zanthia Woodard.

² After visiting a Colorado Sprint store to purchase a cell phone, Ms. Miramontes received a call from a female claiming to be with Sprint Fraud. A short while later, she received a call from a Capital One employee advising Ms. Miramontes of an online credit request in her name that Ms. Miramontes did not make.

written declaration that they were made under the penalties of perjury, and which the defendant did not believe to be true and correct as to every material matter; in violation of section 39-21-118(4), C.R.S., (F5), and against the peace and dignity of the People of the State of Colorado.

COUNT 18

Conspiracy to Commit Filing a False Tax Return, §39-21-118(4) C.R.S.; §18-2-201 (F6) **CON**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, with the intent to promote or facilitate the commission of the crime of Filing a False Tax Return, unlawfully and feloniously agreed with one another that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 39-21-118(4) and 18-2-201, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 19

Computer Crime – Scheme /Defraud - \$20,000 or More, §18-5.5-102(1)(b) C.R.S. (F3) **1502T**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof, for the purpose of devising or executing a scheme or artifice to defraud, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was twenty thousand dollars or more; in violation of section 18-5.5-102(1)(b), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 20

Conspiracy to Commit Computer Crime – Scheme /Defraud - \$20,000 or More,
§18-5.5-102(1)(b) C.R.S.; §18-2-201 C.R.S. (F4) **CON**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, with the intent to promote or facilitate the commission of the crime of Computer Crime – Scheme /Defraud - \$20,000 or More, unlawfully and feloniously agreed with one another that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-5.5-102(1)(b) and 18-2-201, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 21

Theft - \$20,000 Or More, §18-4-401(1),(2)(d), C.R.S. (F3)

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money of Bancorp and or the United States Treasury with a value of more than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Bancorp and or the United States Treasury permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(d), C.R.S. (F-3), and against the peace and dignity of the People of the State of Colorado.

COUNT 22

Conspiracy to Commit Theft - \$20,000 Or More,
§18-4-401(1),(2)(d) C.R.S.; §18-2-201 C.R.S. (F4) **CON**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, with the intent to promote or facilitate the commission of the crime of Theft, unlawfully and feloniously agreed with one another that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1),(2)(d) and 18-2-201, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 23

Theft - \$1,000 - \$20,000, §18-4-401(1),(2)(c) C.R.S. (F4) **0801U**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money of the Colorado Department of Revenue with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Bancorp and or the United States Treasury permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 24

Conspiracy to Commit Theft - \$20,000 Or More,
§18-4-401(1),(2)(d) C.R.S.; §18-2-201 C.R.S. (F4) **CON**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, with the intent to promote or facilitate the commission of the crime of Theft, unlawfully and feloniously agreed with one another that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1),(2)(d) and 18-2-201, C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 25

Attempted Theft - \$20,000 Or More, §18-4-401(1),(2)(d) C.R.S.; §18-2-101 C.R.S. (F4) **ATT**

On or about and between January 1, 2013 and April 15, 2013 in the State of Colorado, **Zanthia Woodard, Jordan Shead and Sorletta Capri Shead**, by engaging in conduct constituting a substantial step toward the commission of Theft, unlawfully, feloniously, and knowingly attempted to obtain or exercise control over a thing of value, namely: money of the Colorado Department of Revenue with a value of more than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive the Colorado Department of Revenue permanently of its use or benefit; in violation of sections 18-4-401(1),(2)(d) and 18-2-101, C.R.S. and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in substantive Counts 16 through 25 include all facts referenced throughout this document, occurred in the State of Colorado, are hereby incorporated by reference as a predicate acts for Counts 1 and 2 and were committed in the following manner:

Zanthia Woodard, Jordan Shead, Sorletta Capri Shead and an individual known as “Arlene Bell” filed multiple fraudulent federal and state tax filings using information obtained from various victims. Zanthia Woodard, Jordan Shead, Sorletta Capri Shead and a person holding herself out as “Arlene Bell” obtained the information from various victim/taxpayers under the premise of providing a legitimate tax preparation service. Some of the known victims provided the members of the conspiracy (or other individuals acting at their request) with their personal and tax related information. Many of the victims were duped into giving over or sending photos of their Social Security cards to Zanthia Woodard and her co-conspirators via text message or email. The conspirators then prepared both state and federal tax filings that contained information from non-existent business entities and fraudulent W-2’s from these non-existent businesses. By filing more than one hundred false state tax returns, the co-conspirators attempted to steal nearly \$90,000.00 from the Colorado Department of Revenue. However, the co-conspirators were only able to defraud the Department of Revenue of \$8,626.00 because the Department of Revenue maintained certain procedural safeguards. The specifics of the fraudulently filed state returns are set forth in greater detail in Attachment A.

Through the filing of over 150 false federal returns, Zanthia Woodard, Jordan Shead, Sorletta Capri Shead and an individual known as “Arlene Bell” were able to defraud federal authorities. The United States Treasury via a financial intermediary, Bancorp, paid out \$899,819.00 in response to the

conspirators' filing of false returns. The specifics of the fraudulently filed federal returns are set forth in greater detail in Attachment B.

Lastly, this particular criminal activity required the use of various electronic devices. Devices such as computers, laptops, tablets, or internet accessible smart cell phones were used to access the internet in order to file the fraudulent tax filings (and to file for the fraudulent Unemployment Insurance claims described in greater detail below). Moreover, the computers, laptops and/or tablets were necessary to manufacture the fraudulent tax documents. These fraudulently manufactured documents include W-2's, related tax documents and Secretary of State filings.

COUNT 26

Identity Theft, §18-5-902(1)(a) C.R.S. (F4) **1307G**

On or about and between January 1, 2013 and May 1, 2014 in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of **EDWARD FINLEY, EMMA J. WELLS, TIA COLLINS, SOPHIA OWENS, STEPHANIE SILLEMON, NORMAN COLEMAN, BRANDON FINLEY, TODD SHINAULT, AUTUMN LACROSBY, SHATAKA GILMER, ERNESTINE BUTLER, CHARISMA FINLEY, WILLIAM WHITFIELD and or DEIANA LOLLIS** without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 27

Identity Theft – Use or Possess with the Intent to Obtain Government Document,
§18-5-902(1)(e) C.R.S. (F4) **1307L**

On or about and between January 1, 2013 and May 1, 2014 in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and knowingly used or possessed the personal identifying information of **EDWARD FINLEY, EMMA J. WELLS, TIA COLLINS, SOPHIA OWENS, STEPHANIE SILLEMON, NORMAN COLEMAN, BRANDON FINLEY, TODD SHINAULT, AUTUMN LACROSBY, SHATAKA GILMER, ERNESTINE BUTLER, CHARISMA FINLEY, WILLIAM WHITFIELD and or DEIANA LOLLIS** without permission or lawful authority with the intent to obtain a government-issued document; in violation of section 18-5-902(1)(e), C.R.S. and against the peace and dignity of the People of the State of Colorado.

COUNT 28

Identity Theft – Alter or Make a Written Instrument or Financial Device,
§18-5-902(1)(c), C.R.S. (F4) **1307J**

On or about and between January 1, 2013 and May 1, 2014 in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and with the intent to defraud, falsely made, completed, altered, or uttered a written instrument or financial device containing personal identifying information or financial identifying information of **EDWARD FINLEY, EMMA J. WELLS, TIA COLLINS, SOPHIA OWENS, STEPHANIE SILLEMON, NORMAN COLEMAN, BRANDON FINLEY, TODD SHINAULT, AUTUMN LACROSBY, SHATAKA GILMER, ERNESTINE BUTLER, CHARISMA FINLEY, WILLIAM WHITFIELD and or DEIANA LOLLIS**; in violation of section 18-5-902(1)(c), C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 29

Theft - More than \$20,000 but less than \$100,000,
§18-4-401(1),(2)(d), C.R.S. (F4)

On or about and between May 15, 2013 and April 1, 2014 in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money of the Colorado Department of Labor and Employment and or JPMorgan Chase with a value of more than twenty thousand dollars but less than one hundred thousand dollars, without authorization, or by threat or deception, and intended to deprive Colorado Department of Labor and Employment and or JPMorgan Chase permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(d), C.R.S. (F-3), and against the peace and dignity of the People of the State of Colorado.

COUNT 30

Attempted Theft - \$5,000 - \$20,000,
§18-4-401(1),(2)(g) C.R.S., §18-2-101 C.R.S. (F6) **ATT**

On or about and between April 1, 2014 and April 15, 2014 in the State of Colorado, **Zanthia Woodard**, by engaging in conduct constituting a substantial step toward the commission of Theft, unlawfully, feloniously, and knowingly attempted to obtain or exercise control over a thing of value, namely: money of the Colorado Department of Labor and Employment and or JPMorgan Chase with the value of five thousand dollars or more but less than twenty thousand dollars; without authorization, or by threat or deception, and intended to deprive the Colorado Department of Labor and Employment and or JPMorgan Chase permanently of its use or benefit; in violation of sections 18-4-401(1),(2)(g) C.R.S. and 18-2-101 C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 31

Computer Crime – Scheme /Defraud – More than \$20,000 but less than \$100,000,
§18-5.5-102(1)(b) C.R.S. (F4) **1502T**

On or about and between January 1, 2013 and May 1, 2014 in the State of Colorado, **Zanthia Woodard**, unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof, for the purpose of devising or executing a scheme or artifice to defraud, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was twenty thousand dollars or more; in violation of section 18-5.5-102(1)(b) C.R.S., and against the peace and dignity of the People of the State of Colorado.

COUNT 32

Attempt To Influence A Public Servant, §18-8-306 C.R.S. (F4) **24051**

On or about and between May 15, 2013 and May 1, 2014 in the State of Colorado **Zanthia Woodard**, unlawfully and feloniously attempted to influence Ellen Golombek, the Executive Director of the Colorado Department of Labor and Employment and or her subordinates, including: CDLE Customer Service Representative Jerome Nyre, Labor & Employment Specialist Rebecca Gallegos and or Latisha Suazo, a Labor & Employment Specialist with the CDLE's Rede Team who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of section 18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 33

False Statement, §8-81-101(1)(a) C.R.S. (Unclassified Misdemeanor)

On or about and between May 15, 2013 and May 1, 2014 in the State of Colorado, **Zanthia Woodard**, knowingly made a false statement or representation of a material fact knowing it to be false, or knowingly failed to disclose a material fact, with intent to defraud the Colorado Department of Labor and Employment and the People of the State of Colorado by obtaining or increasing any benefit under articles 70 to 82 of title 8; in violation of section 8-81-101(1)(a), C.R.S. and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in substantive Counts 26 through 33 include all facts referenced throughout this document, occurred in the State of Colorado, are hereby incorporated by reference as a predicate acts for Counts 1 and 2 (but Count 33 False Statement, § 8-81-101(1)(a) is not included as a predicate act) and were committed in the following manner:

Within the City and County of Denver Zanthia Woodard obtained unemployment benefits (totaling \$18,168) using her social security number³ ending in 0705. Zanthia Woodard attempted to fraudulently collect additional benefits and filed a second claim for UI benefits using her other social security number ending in 2656. On 04/16/2012 Woodard completed an internet application to open a UI claim under the name Zanthia Woodard, using her social security number ending in 0705. Woodard based her own UI claim off of a job separation from Echosphere, LLC. Woodard collected

³ The Social Security Administration erroneously issued Ms. Woodard a second social security number.

UI benefits from the week ending 06/30/2012 through the week ending 05/04/2013. Between 06/25/2012 and 05/13/2013, Woodard knowingly accessed the CDLE computer system and provided false information to conceal her employment and earnings. As a result of this deception, Zanthia Woodard knowingly obtained monies in the form of UI electronic benefit payments deposited into her account between 07/10/2012 and 05/14/2013. Zanthia Woodard through deceit caused the CDLE to issue the funds from that account with the intent to permanently deprive the CDLE of the \$18,168 in unemployment benefits.

On 05/15/2013, Zanthia Woodard provided false statements to CDLE Customer Service Representative, Jerome Nyre to open a UI claim using the identity of Sophia Owens without permission. On 05/21/2013, the CDLE received a fax from Ms. Woodard, containing a signed *Verification of Personal Information* (UIB-1) form, dated 05/20/2013, bearing the forged signature "Sophia Owens" as well as a copy of Sophia Owens' Colorado Driver's License. On 05/21/2013, the CDLE received a fax from Zanthia Woodard, containing a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 05/20/2013, bearing the forged signature "Sophia Owens." Between 05/27/2013 and 09/15/2013, Ms. Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits fraudulently using the identity of Sophia Owens. As a result of this deception, Zanthia Woodard knowingly obtained monies in the form of UI electronic benefit payments (totaling \$4,089) deposited into a JPMorgan Chase UI account in the name of Sophia Owens between 06/04/2013 and 09/03/2013. Zanthia Woodard withdrew funds from that account with the intent to permanently deprive the CDLE of the monetary value.

On 05/17/2013, Woodard filed a new UI claim over the phone with Labor & Employment Specialist Rebecca Gallegos. During the filing, Woodard (using her social security number ending in 2656) falsely reported Charizma Beauty Salon as her last employer. Woodard falsely stated she worked 40 hours a week for Charizma Beauty Salon as a hairdresser/manager from 02/16/2012 through 04/16/2013. As explained earlier, Charizma Beauty Salon is a bogus business lacking a storefront. On 05/29/2013, a fake W-2 from Charizma Beauty Salon and *Request for Correction of Wages* (form UIB-5) were faxed to the CDLE by Woodard. Additionally, there was a second copy of the W-2 that bears a handwritten note that reads in part, "you may contact me Charizma Finley @ 303-261-5864 If you have any Questions" (sic). On 06/24/2013, Woodard spoke with Latisha Suazo, a Labor & Employment Specialist with the CDLE's Rede Team. In order to continue the theft scheme, Zanthia Woodard stated that her correct social security number ended in 2656, however she did admit she worked for Echosphere, LLC who reported Woodard's wages under her social security number ending in 0705. Woodard also falsely claimed her ex-roommate used her name and social security number to work and file for unemployment. The Social Security Administration confirmed that due to a previous scheme by Woodard, both social security numbers were valid and both belonged to her. In essence, Woodard attempted to "double dip" and steal from the CDLE under two simultaneous UI claims hoping the separate but valid social security numbers would allow her to perpetrate the theft scheme against the CDLE.

On 06/24/2013, Zanthia Woodard completed and uttered an internet application to fraudulently open a UI claim using the identity of Todd Shinault without permission. On 07/01/2013, the CDLE received a fax from Zanthia Woodard containing a signed *Verification of Personal Information* (UIB-1) form, dated 06/28/2013, bearing the forged signature "T. Shinault." On 07/02/2013, the CDLE received a fax from Zanthia Woodard containing a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 06/28/2013, bearing the forged signature "T. Shinault." Between 06/24/2013 and 01/05/2014, Ms. Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits fraudulently using the identity of Todd Shinault. As a result of this deception, Zanthia Woodard knowingly obtained monies in the form of UI electronic benefit payments (totaling \$10,738) deposited into a JPMorgan Chase UI account in the name of Todd

Shinault between 07/17/2013 and 01/06/2014. Zanthia Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE of the monetary value.

On 06/24/2013, Zanthia Woodard completed an internet application to open a UI claim using the identity of Shataka Gilmer without permission. On 6/27/2013, the CDLE received a fax from Zanthia Woodard, containing a signed *Verification of Personal Information* (UIB-1) form, dated 06/26/2013, bearing the forged signature "Shataka Gilmer." On 06/27/2013, the CDLE received a fax from Zanthia Woodard containing a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 06/26/2013, bearing the forged signature "Shataka Gilmer." On 7/11/2013, the CDLE received a fax from Zanthia Woodard containing form *Request for Information about Former Employee's Employment* (UIB-290). Also on that date, the CDLE received a fax from Zanthia Woodard containing form *Notice of Unemployment Insurance Claim, Wages Reported, and Possible Charges* (UIF-290). The forms contained false information and were signed "Zanthia Woodard" on 07/09/2013. On the forms, Woodard listed her title as "Part Owner" and "Supervisor." Both of these forms were originally mailed to "Joy House Daycare, Zanthia Woodard," on Arapahoe Street in Denver. Between 06/24/2013 and 01/05/2014, Zanthia Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits (unemployment benefits totaling \$10,114) fraudulently using the identity of Shataka Gilmer. As a result of this deception, Zanthia Woodard knowingly obtained monies in the form of UI electronic benefit payments deposited into a JPMorgan Chase UI account in the name of Shataka Gilmer between 07/08/2013 and 01/06/2014. Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE.

On 06/27/2013, Zanthia Woodard completed an internet application to open a UI claim using the identity of William Whitfield without permission. On 07/09/2013, the CDLE received a fax from Zanthia Woodard containing a signed *Verification of Personal Information* (UIB-1) form, dated 07/01/2013, bearing the forged signature "William Whitfield." On 07/09/2013, the CDLE received a fax from Zanthia Woodard containing a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 07/01/2013, bearing the forged signature "William Whitfield." Between 06/27/2013 and 12/29/2013, Ms. Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits fraudulently using the identity of William Whitfield. As a result of this deception, Zanthia Woodard knowingly obtained monies (totaling \$10,721) in the form of UI electronic benefit payments deposited into a JPMorgan Chase UI account in the name of William Whitfield between 07/15/2013 and 12/30/2013. Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE. .

On 06/27/2013, Zanthia Woodard provided deceitful information to public servant Jerome Nyre, a CDLE Customer Service Representative, in order to fraudulently open an unemployment insurance ("UI") claim using the identity of Ernestine Butler without permission. On 07/12/2013, the CDLE received a fax uttered by Zanthia Woodard containing a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5) dated 07/01/2013 and bearing the forged signature "E. Butler." Between 07/14/2013 and 12/29/2013, Ms. Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits fraudulently using the identity and personal identifying information of Ernestine Butler. As a result of this deception, Zanthia Woodard knowingly obtained monies (totaling \$10,983) in the form of UI electronic benefit payments deposited into a JPMorgan Chase UI account in the name of Ernestine Butler between 07/17/2013 and 12/30/2013. Zanthia Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE of the monetary value.

On 12/19/2013, Zanthia Woodard completed an internet application to open a UI claim using the identity of Norman Coleman without permission. On 01/06/2014, the CDLE received a fax from Ms.

Woodard containing a signed *Verification of Personal Information* (UIB-1) form, dated 01/05/2014, bearing the forged signature “Norman Coleman.” On 01/07/2014, the CDLE received a fax from Zanthia Woodard containing a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 01/05/2014 and bearing the forged signature “Norman Coleman.” Between 12/19/2013 and 03/17/2014, Zanthia Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits fraudulently using the identity of Norman Coleman. As a result of this deception, Zanthia Woodard knowingly obtained monies (totaling \$3,969) in the form of UI electronic benefit payments deposited into a JPMorgan Chase UI account in the name of Norman Coleman between 01/08/2014 and 03/03/2014. Zanthia Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE.

On 12/19/2013, Zanthia Woodard completed an internet application to open a UI claim using the identity of Brandon Finley without permission. On 01/06/2014, the CDLE received a fax from Zanthia Woodard containing a signed *Verification of Personal Information* (UIB-1) form, dated 01/04/2014 and bearing the forged signature “Brandon Finley.” On 01/07/2014, the CDLE received a fax from Woodard containing a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 01/04/2014, bearing the forged signature “Brandon Finley.” Between 12/19/2013 and 03/17/2014, Zanthia Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits using the identity of Brandon Finley. As a result of this deception, Zanthia Woodard knowingly obtained monies (totaling \$3,753) in the form of UI electronic benefit payments deposited into a JPMorgan Chase UI account in the name of Brandon Finley between 01/09/2014 and 03/03/2014. Zanthia Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE.

On 12/19/2013, Zanthia Woodard completed an internet application to open a UI claim using the identity of Stephanie Sillemmon without permission. On 01/06/2014, the CDLE received a fax from Zanthia Woodard containing a signed *Verification of Personal Information* (UIB-1) form, dated 01/06/2014 and bearing the forged signature “S. Sillemmon.” On 01/15/2014, the CDLE received a fax from Zanthia Woodard at 303-997-4040 which contained a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 01/09/2014 and bearing the forged signature “S. Sillemmon.” Between 12/19/2013 and 03/17/2014, Zanthia Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits using the identity of Stephanie Sillemmon. As a result of this deception, Zanthia Woodard knowingly obtained monies (totaling \$3,411) in the form of UI electronic benefit payments deposited into a JPMorgan Chase UI account in the name of Stephanie Sillemmon between 01/28/2014 through 03/03/2014. Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE.

On 12/19/2013, Zanthia Woodard completed an internet application to open a UI claim using the identity of Tia Collins without permission. On 01/06/2014, the CDLE received a fax from Zanthia Woodard containing a signed *Verification of Personal Information* (UIB-1) form, dated 01/06/2014 and bearing the forged signature “Tia Collins.” On 01/15/2014, the CDLE received a fax from Zanthia Woodard at 303-997-4040, which contained a fictitious W-2 and a form, *Request for Correction of Wages* (UIB-5), dated 01/07/2014, bearing the forged signature “Tia Collins.” Between 12/19/2013 and 03/17/2014, Zanthia Woodard knowingly accessed the CDLE computer system and provided false information to obtain monetary benefits fraudulently using the identity of Tia Collins. As a result of this deception, Woodard knowingly obtained monies (totaling \$3,825) in the form of UI electronic benefit payments deposited into a JPMorgan Chase UI account in the name of Tia Collins 01/22/2014 through 03/10/2014. Zanthia Woodard withdrew the funds from that account with the intent to permanently deprive the CDLE.

Within the City and County of Denver Zanthia Woodard attempted to fraudulently obtain unemployment benefits using the identity of Edward Finley. On 4/8/2014, Woodard completed an internet application to open a UI claim using the identity of Edward Finley. At the time of the application Edward Finley was incarcerated at the Adams County Jail on charges unrelated to this indictment. Accordingly, the CDLE put a hold on the claim prior to proof of wages being received and prior to the payment of any benefits.

In part, Ms. Woodard used the stolen money –via a “CAP” card- obtained by deceit from CDLE to make payments on her Cadillac DTS, to gamble in Black Hawk and take vacations in Los Angeles, and Miami. Furthermore, Ms. Woodard also used the stolen funds to make purchases at nail studios, the Apple Store, various clothing stores, medical marijuana dispensaries, video game stores, designer sunglass retailers, Car Toys, Foot Locker, sports ticket vendors, sport collectible retailers, and perfume retailers. She also used the stolen money to make purchases related to calastrology (love spells, money spells & witchcraft). Additionally, Ms. Woodard used the stolen Unemployment Insurance funds to make payments on her son’s tattoo removal⁴ and to post bond for her brother when he was arrested.

While executing a search warrant at Ms. Woodard’s residence, investigators observed there appeared to be newer furniture throughout the home including: large flat screen televisions in most of the rooms, many luxury appliances/devices such as a home security system, counter-top ice maker, wine chiller, iPad mini, Blu-ray player and other evidence of expensive items. The bedrooms of the home contained at least one hundred pairs of women’s shoes, high dollar wigs, and a large collection of what appeared to be designer purses throughout (Coach, Prada, Juicy Couture, Louis Vuitton, Chanel, and Gucci). The investigators also observed a large amount of jewelry, some of it high end including several boxes from Tiffany & Co.

At that time of the execution of the search warrant Ms. Woodard’s wage earning history had been as follows:

Year	Reported Earnings from ECHOSPHERE	Reported Earnings from SPRINT
2008	\$26,566.50	
2009	\$29,479.73	
2010	\$34,833.53	
2011	\$32,190.97	
2012	\$10,891.79	
2013		\$5552.08
2014		\$7248.22

⁴ The procedure involved the removal of the script name “Zanthia” from the son’s neck so that he could enter the military. At that time Army regulations prohibited service members from displaying tattoos on designated areas of the body.

COUNT 34

Attempt To Influence A Public Servant, §18-8-306 C.R.S. (F4) **24051**

On or about and between June 25, 2013 and July 23, 2013 in the State of Colorado **Zanthia Woodard**, unlawfully and feloniously attempted to influence Investigator Manuella Larsen of the Denver Department of Social Services who is a public servant, by means of deceit, with the intent thereby to alter or affect those public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

The offense alleged in substantive Count 34 includes all previous referenced facts above, occurred in the State of Colorado, is hereby incorporated by reference as a predicate act for Counts 1 and 2 and was committed in the following manner:

On June 25, 2013 Denver Department of Social Services (DDSS) Investigator Manuella Larsen interviewed Zanthia Woodard at the DDSS office on 1200 Federal Boulevard about Ms. Woodard's multiple applications for Colorado Works, Food and Medicaid Assistance. Investigator Larsen questioned why Ms. Woodard had two social security numbers associated with her name. In response, Ms. Woodard stated her twin sister "Finley" stole her personal identifying information and applied for assistance without her knowledge. Moreover, Woodard signed a written statement acknowledging the existence of a twin sister "Finley" who had stolen Ms. Woodard's identity.

Shortly after the interview, Investigator Larsen researched various databases and discovered Ms. Woodard's Georgia birth certificate. The birth certificate listed Ms. Woodard as a single birth. Further, the investigator also learned that Ms. Woodard had somehow established a second social security number connected to herself. Realizing the ruse of Ms. Woodard, Investigator Larsen interviewed Ms. Woodard again on July 23, 2013. Investigator Larsen showed Ms. Woodard the birth certificate and Ms. Woodard then admitted to receiving public assistance under both social security numbers. Ms. Woodard verbally agreed to pay back the moneys. No money has been paid back to DDSS by Ms. Woodard.

COUNT 35

Attempt To Influence A Public Servant, §18-8-306 C.R.S. (F4) **24051**

On or about April 7, 2014 in the State of Colorado **Jenae Cruz**, unlawfully and feloniously attempted to influence Labor and Employment Specialist Catherine Isaac of the Colorado Department of Labor and Employment, who is a public servant, by means of deceit, with the intent thereby to alter or affect those public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 36

Attempt To Influence A Public Servant, §18-8-306 C.R.S. (F4) **24051**

On or about August 28, 2014 in the State of Colorado **Jenae Cruz**, unlawfully and feloniously attempted to influence Criminal Tax Investigator Charlie Schlaufman of the Colorado

Department of Revenue, who is a public servant, by means of deceit, with the intent thereby to alter or affect those public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in substantive Counts 35 and 36 include all previous referenced facts above, occurred in the State of Colorado, are hereby incorporated by reference as predicate acts for Counts 1 and 2 and were committed in the following manner:

In March of 2014, bank investigators from Wells Fargo learned Jenae Cruz had exceeded her authorized access to the Wells Fargo computer system when opening accounts. The investigators questioned Ms. Cruz and learned of her behavior of improperly accessing their computer network. During the course of the questioning Ms. Cruz made deceitful statements to hide her role in the enterprise and to maintain her employment. One of the several deceitful statements involved Ms. Cruz telling the Wells Fargo Investigators that the driver's licenses were "on file" and that they were inside her desk. Wells Fargo Investigators immediately checked this assertion by Ms. Cruz. However, no driver's licenses or signature cards were located inside the desk as Ms. Cruz had claimed. Likewise, no driver's licenses or signature cards were ever found. As a result of this violation of Wells Fargo's corporate policy and law, Wells Fargo terminated Ms. Cruz's employment.

Shortly after her termination from Wells Fargo, Ms. Jenae Cruz contacted the Colorado Department of Labor and Employment to apply for unemployment insurance benefits. After completing an online application for unemployment, Ms. Cruz spoke to Labor and Employment Specialist Catherine Isaac on April 7, 2014 and provided deceitful information. Ms. Cruz relayed pressure at Wells Fargo exists on "personal bankers", like herself, to open new accounts. Ms. Cruz also explained that if a personal banker fails to meet their daily goals, then management encourages calls to family and friends in efforts to open new accounts and meet the daily quota. Ms. Cruz then deceitfully stated that she, Ms. Cruz, called her cousin and it was a friend of her cousin who opened the account.⁵ Ms. Cruz falsely added that the "friend of the cousin" faxed a copy of their ID to the bank and she opened the account. Amongst other statements, Ms. Cruz concluded her fictitious story to Ms. Isaac by mentioning that her manager allowed Ms. Cruz to open the one account in question with faxed identification (in contravention of Wells Fargo policy).

Due to the circumstances of her firing, had Ms. Cruz not provided deceitful information to Ms. Isaac, Ms. Cruz may not have been eligible to receive unemployment benefits.

In August of 2014 Investigator Charlie Schlaufman interviewed Ms. Cruz about her overall role in the enterprise and specifically her role in the identity theft scheme of Zanthia Woodard. Ms. Cruz, in attempts to deceive Investigator Schlaufman and in efforts to minimize her role in the enterprise, informed the investigator that she kept the driver license copies on file because she "saves everything". In actuality, Ms. Cruz received the driver's license factual information from Zanthia Woodard via text and Facebook messages, but not copies of the licenses themselves. Further, Ms. Cruz deceitfully relayed that her former supervisor and other former co-workers had found copies of the driver's licenses.

⁵ The reader should also note that several accounts were opened by Ms. Cruz. Yet Ms. Cruz claims her firing involved only one account in her conversation with Ms. Isaac.

