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Clerk, U.S. District and Bankruptcy Courts

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	**Case No.** 20-cr-61 (APM)
v.	
CRAVEN CASPER	**VIOLATION:** **18 U.S.C. § 1341 (Mail Fraud)**
Defendant.	

STATEMENT OF OFFENSE

Pursuant to Fed. R. Crim. P. 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant CRAVEN CASPER, with the concurrence of his attorney, hereby agree and stipulate as follows:

SCHEME TO DEFRAUD

1. From at least on or about January 2018, to on or about October 17, 2019, defendant CRAVEN CASPER, a resident of the District of Columbia, devised and intended to devise a scheme to defraud, 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 that:

a. CRAVEN CASPER obtained the names and addresses of ten or more real individuals who reside in the United States.

b. CRAVEN CASPER then obtained five or more Social Security numbers for those individuals through the use of commercially available online databases. CRAVEN CASPER obtained those individuals' Social Security numbers from those online databases by falsely affirming that he had a "permissible purpose" to obtain the Social Security numbers, and by

providing the name and date of birth as an identifier for the individual for whom he was seeking the Social Security Number from the online database.

c. CRAVEN CASPER then used those individuals' names and Social Security Numbers to create false federal W-2 tax forms and false state income tax returns for those individuals.

d. CRAVEN CASPER then filed the false and fraudulent tax returns through the U.S. mail from the District of Columbia and elsewhere to the taxing authorities of Alabama, the District of Columbia, Georgia, Illinois, Indiana, Iowa, Kentucky, Massachusetts, Maryland, New York, Ohio, South Carolina, Virginia, Vermont, West Virginia, and Wisconsin.

e. CRAVEN CASPER received tax refund checks through the U.S. mail from the taxing authorities of the District of Columbia, Georgia, Kentucky, Massachusetts, Maryland, South Carolina, and Virginia. CRAVEN CASPER received those tax refund checks at Post Office Boxes and street addresses located in the District of Columbia and North Carolina that he controlled.

f. CRAVEN CASPER successfully negotiated approximately 47 of those fraudulently-obtained tax refund checks between on or about February 2018 and on or about July 2019. CRAVEN CASPER successfully negotiated approximately $197,518.82 in fraudulently-obtained tax refund checks.

g. CRAVEN CASPER, in furtherance of the above-described scheme, also obtained more than five North Carolina drivers licenses in other peoples' names, without their knowledge or consent, and then used those drivers licenses to assist in negotiating the fraudulently obtained tax refund checks.

h. CRAVEN CASPER also submitted online fraudulent claims, in other peoples' names, to various class action settlement funds for payments of money from class action settlements that he was not entitled to receive.

i. CRAVEN CASPER submitted his fraudulent claims for class action settlement funds online from the District of Columbia and elsewhere.

j. CRAVEN CASPER received class action settlement checks in the mail at Post Office Boxes in the District of Columbia and elsewhere that he controlled. Between approximately December 2017 and February 15, 2018, CRAVEN CASPER successfully negotiated at least 120 fraudulently-obtained class action settlement checks, totaling approximately $34,487.84.

OVERT ACT IN FURTHERANCE OF THE SCHEME

3. On or about August 28, 2018, in the District of Columbia, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, the defendant, CRAVEN CASPER, knowingly caused to be delivered by mail, according to the direction thereon, the following matter: a tax refund check in the amount of $4,289.38 issued by the District of Columbia Office of Tax and Revenue.

LIMITED NATURE OF PROFFER

This proffer of evidence is not intended to constitute a complete statement of all facts known by the defendant or the government, but is a minimum statement of facts intended to provide the necessary factual predicate for the guilty plea.

Respectfully submitted,

TIMOTHY J. SHEA
United States Attorney
D.C. Bar No. 437437

By: _____

MICHAEL J. MARANDO
Assistant United States Attorney
Fraud & Public Corruption Section
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DEFENDANT'S ACKNOWLEDGMENT

The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to the charge against me. It does not include all of the facts known to me regarding this offense. I make this statement knowingly and voluntarily and because I am, in fact, guilty of the crime charged. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of Offense fully.

I have read every word of this Statement of the Offense, or have had it read to me. Pursuant to Federal Rule of Criminal Procedure 11, after consulting with my attorney, I agree and stipulate to this Statement of the Offense, and declare under penalty of perjury that it is true and correct.

Date: March 12, 2020

Craven Casper
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of Offense and have reviewed it with my client Craven Casper. I concur in my client's desire to adopt this Statement of Offense as true and accurate.

Date: 3/12/2020

Michelle Peterson
Attorney for Craven Casper