IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	**:**	**CRIMINAL NO. 26-**
v.	**:**	**DATE FILED:**
TIMEEKA LOUD	**:**	**VIOLATIONS:**
	:	**26 U.S.C. § 7206(2) (aiding and assisting in the preparation of false tax returns – 9 counts)**
	:	**18 U.S.C. § 1341 (mail fraud – 25 counts)**
	:	**18 U.S.C. § 641 (theft of government money – 1 count)**
		Notice of forfeiture

INFORMATION

COUNTS ONE THROUGH NINE
(Aiding and Assisting in the Preparation of False Tax Returns)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

INTRODUCTION

1. Defendant TIMEEKA LOUD was a resident of Philadelphia, Pennsylvania, who worked as a tax return preparer.

2. At times, defendant TIMEEKA LOUD prepared tax returns for clients at her home. From in or about June 2022 to in or about late 2023, defendant LOUD was employed at TNT Tax Professionals ("TNT"), where she prepared tax returns for clients of TNT and its owner, Latisha Dudley, charged elsewhere.

3. Among other individuals, defendant TIMEEKA LOUD prepared and filed employment tax returns on behalf of Tinisha Loud, Ann Grice, and Hasiyna Carroll, all of whom are charged elsewhere.

The COVID-19 Relief Tax Credits

4. The Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act"), enacted on March 27, 2020, provided for an employee retention credit ("ERC") designed to encourage businesses to retain employees on their payroll during the COVID-19 pandemic. The Taxpayer Certainty and Disaster Tax Relief Act of 2020 and the American Rescue Plan Act ("ARPA") modified and extended the ERC.

5. For calendar year 2020, eligible employers were authorized to claim an ERC offsetting certain employment taxes that could not exceed 50 percent of up to $10,000 of qualified wages paid to each employee from March 13, 2020 through December 31, 2020. The maximum ERC was $5,000 per employee for calendar year 2020. For calendar year 2021, eligible employers were authorized to claim an ERC offsetting certain employment taxes that could not exceed 70 percent of up to $10,000 of qualified wages paid to each employee during each quarter. The maximum ERC was $7,000 per employee per quarter for calendar year 2021.

6. Generally, businesses and tax-exempt organizations that qualified for the ERC were those that: (a) were shut down during 2020 or the first three calendar quarters of 2021 by government order due to the COVID-19 pandemic; (b) experienced a specified decline in gross receipts during the eligibility periods during 2020 or the first three calendar quarters of 2021; or (c) qualified as a recovery startup business for the third or fourth quarters of 2021.

7. The Families First Coronavirus Response Act provided for eligible employers to receive refundable tax credits for wages paid to employees while on sick leave to recover from any injury, disability, illness, or condition resulting from COVID-19 or wages paid to employees while on family leave to care for a family member who was injured, disabled, ill,

or otherwise suffering from a condition due to COVID-19. These credits were called the Qualified Sick and Family Leave ("QSFL") credit.

8. Employers were entitled to receive a dollar-for-dollar QSFL credit for qualified wages paid to an employee, plus allocable health plan expenses and the employer's share of Medicare taxes, while the employee was on sick leave resulting from COVID-19. This QSFL credit was limited to up to ten days of sick leave per employee for the period ending March 31, 2021. That resulted in a maximum credit of $5,110 per employee for that period. The ARPA provided an identical credit for the period from April 1, 2021 through September 31, 2021, with an identical maximum of $5,110 in credits per employee.

9. Employers were also entitled to receive a QSFL credit of up to two-thirds of the qualified wages paid to an employee while the employee was on family leave to care for a family member suffering from a condition resulting from COVID-19, plus allocable health plan expenses and the employer's share of Medicare taxes. For the period ending March 31, 2021, this credit was limited to up to $200 per day for up to ten weeks, resulting in a maximum eligible credit of $10,000 per employee. The ARPA provided an identical credit for the period April 1, 2021 through September 30, 2021, and extended the length of family leave to twelve weeks, thereby raising the maximum eligible QSFL credit for this period to $12,000 per employee.

Form 941 Filings

10. ERC and QSFL credits (referred to collectively as "COVID-19 related tax credits") were claimed by employers by filing an Employer's Quarterly Federal Tax Return, Form 941, or an Adjusted Employer's Quarterly Federal Tax Return or Claim of Refund, Form 941X (collectively and interchangeably, "Form 941," "Forms 941," or "Form 941s"), with the Internal Revenue Service ("IRS") for the relevant quarter or quarters.

11. Forms 941 reported the business name, its address, and the employer's Employer Identification Number ("EIN"), also known as the Federal Employer Identification Number or the Federal Tax Identification Number. The Form 941s also reported the number of employees the business had (line 1) and the wages paid by the business (line 2) during that quarter.

12. Critically, in order to qualify for the ERC and related QSFL credit, the filing business must have paid employees during certain quarters during the COVID-19 pandemic. Moreover, for the QSFL credit, the filing business must have paid sick or family leave wages. Employers were not eligible to receive both the ERC and QSFL credit with respect to the same wages.

13. Employers that paid sick and family leave wages in quarters in 2020, 2021, 2022, and 2023 for leave that employees took after March 31, 2020, and before October 1, 2021, were eligible to claim a credit for qualified sick and family leave wages on Forms 941 for the quarters in which those qualified wages were paid.

14. For the COVID-19 related credits, based on the numbers reported on the Form 941, the U.S. Treasury issued a check in the name of the employer identified on the Form 941 and mailed the check to the employer's address as it appeared on the Form 941. Each Form 941 represented a separate claim to the government.

15. The IRS relied on the information reported on the Form 941 filed for each quarter, or for each quarter in the event Form 941 was filed late, about the purported business' existence, number of employees, and wages paid to the employees to make the credit payments to employers.

16. Forms 941 can be electronically filed with the IRS using tax preparation

software, such as, in this case, TaxBandits.

17. TaxBandits was a legitimate commercially available tax preparation software provided by SPAN Enterprises. TaxBandits was an online application primarily used to file Forms 941 with the IRS. The TaxBandits program captured a range of information about each Form 941 user and transaction. TaxBandits records identified: (i) the nature of each individual activity (*e.g.*, creating an account; updating information; adding credit card information; and transmitting to IRS); (ii) the dates and time stamps of the activity; (iii) the Internet Protocol ("IP") address from which the activity originated; and (iv) the type of device and web browser used to access the TaxBandits software.

18. Upon receipt of each Form 941, TaxBandits sent an email to the submitter of the Form 941 and to the individual/entity that was identified as the employer on each Form 941 containing a link to a copy of the Form 941, a copy of Form 8453 (E-File Declaration for Employment Tax Return), an online filing acceptance letter, and a receipt for payment of the TaxBandits filing fee.

THE SCHEME

19. From in or about early 2022 through in or about late 2023, defendant TIMEEKA LOUD devised and implemented a scheme to defraud the IRS by filing numerous fraudulent Forms 941 claiming false COVID-19 related tax credits, specifically ERC and QSFL credits, for purported companies in order to obtain undeserved refund payments from the IRS.

20. As part of the scheme, defendant TIMEEKA LOUD prepared and filed false Forms 941 for her own business entity called Eternity Properties Investment, LLC seeking fraudulent refunds.

21. In addition, defendant TIMEEKA LOUD recruited numerous individuals, including her friends and family, to pose as the operators of businesses, most of which had no or minimal actual operations, so that she could file Forms 941 in the names of these businesses and seek fraudulent refunds.

22. Defendant TIMEEKA LOUD recruited individuals who had already formed business entities and possessed an EIN for this business entity from the IRS.

23. As part of her recruitment, defendant TIMEEKA LOUD frequently told the recruited individuals that she would obtain money from the government in connection with their business entities, charge the individuals approximately $1,500 for every tax return filed with the IRS, and charge the individuals a percentage of all refunds obtained in the name of their business entities, usually between 20 and 30 percent.

24. After recruiting an individual to participate in the scheme, defendant TIMEEKA LOUD obtained the individual's personal and business information, if defendant LOUD did not have this information already.

25. Defendant TIMEEKA LOUD used this personal and business information to prepare and cause the preparation of fraudulent Forms 941 in the name of the recruited individuals' business entities claiming false COVID-19 related tax credits. These Forms 941 were prepared in the business entity names that defendant LOUD obtained from the recruited individuals. For the address of these entities, these Forms 941 used the home address of the recruited individual.

26. The fraudulent Forms 941 that defendant TIMEEKA LOUD prepared for herself and the recruited individuals claimed false and inflated numbers of employees of the businesses (line 1) and false and inflated wages, tips, and other compensation (line 2). Based

upon these and other false figures in the Forms 941, these fraudulent tax returns also claimed false and inflated ERC and QSFL credits for the applicable quarter (lines 11b, 11c, 13c, 13d, and/or 13e), as well as false and inflated overpayment amounts (line 15).. Where there is an overpayment amount, Form 941 gives the filer an option to "apply [the overpayment] to next return" or "send a refund" (line 15). The fraudulent Forms 941 had the "send a refund" box checked in order to obtain a fraudulent refund payment.

27. When preparing and causing to be prepared these fraudulent Forms 941 for the recruited individuals, defendant TIMEEKA LOUD included the name of the recruited individuals as the owner of the business entity for each Form 941. Defendant LOUD, however, omitted her own name as the paid preparer of the return, even though she served in this role.

28. Defendant TIMEEKA LOUD then filed and caused the filing of these fraudulent Forms 941 for both herself and the recruited individuals with the IRS. Defendant LOUD used TaxBandits to file these tax returns electronically. Defendant LOUD often charged the recruited individuals approximately $1,500 for filing each of these returns.

29. Defendant TIMEEKA LOUD usually filed fraudulent Forms 941 for the business entity of a recruited individual in small groups of two to three returns, significantly after the deadline for the filing of these tax returns (which was one month after the last day of the appliable quarter).

30. From in or about January 2022 to in or about late 2023, defendant TIMEEKA LOUD caused to be prepared and filed approximately 131 fraudulent Form 941s, which collectively claimed a total of approximately $23 million in fraudulent refunds for COVID-19 related tax credits.

31. As a result of the fraudulent Forms 941 that defendant TIMEEKA LOUD caused to be prepared and filed, defendant LOUD successfully caused the IRS to issue refund checks in connection with many of these fraudulent Forms 941. These refund checks were issued in the names of the business entities in whose name defendant LOUD prepared fraudulent Forms 941. As directed, the IRS sent these refunds checks via U.S. mail to the addresses on the fraudulent Forms 941, which were normally the home addresses of the recruited individuals or addresses that they controlled.

32. In anticipation of their receipt of IRS refund checks, defendant TIMEEKA LOUD suggested that the recruited individuals deposit the refund checks that they received in the mail into business bank accounts in the name of their business entities. In many instances, because these entities were not operating, the recruited individuals had to open business bank accounts shortly before or when they received the checks.

33. When the recruited individuals received the mailed checks, they deposited them into business bank accounts in the name of their business entities.

34. Defendant TIMEEKA LOUD instructed the recruited individuals to transfer to her a significant percentage of all refunds that they received, usually 20 to 30 percent, shortly after they deposited the fraudulent IRS refunds. If the recruited individuals did not transfer this fee to defendant LOUD quickly, defendant LOUD sometimes charged the recruited individuals a higher percentage fee.

35. Pursuant to her fraudulent scheme, defendant TIMEEKA LOUD caused the U.S. Treasury to mail approximately 25 refund checks totaling at least $4.5 million to the recruited individuals. As a result of the issuance of these fraudulent refund checks, defendant LOUD received fee payments of at least $1.2 million.

36. For defendant TIMEEKA LOUD's business alone, defendant LOUD filed fraudulent Forms 941 claiming approximately $2.1 million in fraudulent COVID-19 related tax credits. As a result of these filings, defendant LOUD caused the U.S. Treasury to issue over $400,000 in unwarranted refund checks in the name of defendant LOUD's business, even though, as defendant LOUD knew, the number of employees and wages reported on these Forms 941 were materially false.

37. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

TIMEEKA LOUD

willfully aided and assisted in, and procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of Employer's Quarterly Federal Tax Returns, Forms 941, for the taxpayer businesses and tax periods set forth below, which were false and fraudulent as to a material matter, each filing constituting a separate count. The tax returns reported that the taxpayer businesses had certain numbers or amounts of (i) employees (line 1); (ii) wages, tips, and other compensation (line 2); (iii) refundable portion of credit for qualified sick and family leave wages (line 13c); (iv) refundable portion of employee retention credit (line 13d); and (v) overpayment (line 15), whereas, as defendant LOUD knew, these numbers and amounts were materially false and inflated.

Count	Taxpayer Business	Tax Period	Date	Associated Individual
1	Eternity Properties Investment, LLC	2Q21	2/5/22	Defendant TIMEEKA LOUD
2	Eternity Properties Investment, LLC	4Q21	2/5/22	Defendant TIMEEKA LOUD
3	Meeka Care, LLC	1Q21	1/23/22	Tinisha Loud
4	Nataerocelline, LLC	2Q22	10/13/22	Tinisha Loud
5	AMG Development	4Q21	2/5/22	Ann Grice
6	Gifted Queen	1Q21	6/26/22	Hasiyna Carroll

Count	Taxpayer Business	Tax Period	Date	Associated Individual
7	Uzuri by Nature LLC	3Q22	10/19/22	Hasiyna Carroll
8	Ariel View Construction & Realty, LLC	1Q22	10/19/22	Person 1
9	Nicole's Doin the Most Boutique	4Q21	2/5/22	Person 2

All in violation of Title 26, United States Code, Section 7206(2).

COUNTS TEN THROUGH THIRTY-FOUR
(Mail Fraud)

1. Paragraphs 1 through 18 of Counts One through Nine are incorporated here.

THE SCHEME

2. From in or about early 2022 to in or about late 2023, in the Eastern District of Pennsylvania, and elsewhere, defendant

TIMEEKA LOUD

devised and intended to devise a scheme to defraud the IRS and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was a part of the scheme that:

3. Paragraphs 20 through 36 of Counts One through Nine are incorporated here.

MAILINGS

4. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TIMEEKA LOUD,

for the purpose of executing the scheme described above, knowingly caused to be delivered by mail according to the directions thereon the mailings described below for each count, each mailing constituting a separate count, delivered from Kansas City, Missouri, to Philadelphia or Yeadon, Pennsylvania:

Count	Tax Period	Approx. Mailing Date of U.S. Treasury Check	Business Entity	Approx. Amount of Check Issued
10	2Q21	5/24/22	Eternity Properties Investment	$205,027.25
11	4Q21	5/24/22	Eternity Properties Investment	$205,111.53
12	1Q21	7/5/22	Meeka Care	$258,954.85
13	2Q21	7/5/22	Meeka Care	$205,553.83
14	3Q21	7/5/22	Meeka Care	$205,553.83
15	2Q22	11/15/22	Nataetrocelline, LLC	$193,291.76
16	2Q21	5/24/22	AMG Development Investments	$200,239.55
17	4Q21	5/24/22	AMG Development Investments	$200,321.86
18	2Q22	11/8/22	AMG Development Investments	$198,393.93
19	3Q22	11/2/22	AMG Development Investments	$193,393.93
20	2Q20	10/4/22	Gifted Queen	$128,079.61
21	3Q20	10/4/22	Gifted Queen	$128,079.61
22	4Q20	10/4/22	Gifted Queen	$128,079.61
23	1Q21	10/4/22	Gifted Queen	$166,678.86
24	2Q21	10/4/22	Gifted Queen	$132,448.20
25	3Q21	10/4/22	Gifted Queen	$132,448.20
26	3Q22	11/29/22	Uzuri by Nature, LLC	$184,481.00
27	1Q22	5/24/22	Ariel View Construction & Realty, LLC	$174,076.48
28	2Q22	5/24/22	Ariel View Construction & Realty, LLC	$174,076.48
29	3Q22	11/8/22	Ariel View Construction & Realty, LLC	$174,076.48
30	2Q21	5/31/22	Nicole’s Doin the Most Boutique	$196,634.20
31	4Q21	5/31/22	Nicole’s Doin the Most Boutique	$196,715.02
32	1Q22	11/8/22	Nicole’s Doin the Most Boutique	$194,672.42
33	2Q22	11/15/22	Nicole’s Doin the Most Boutique	$194,672.42
34	3Q22	11/22/22	Nicole’s Doin the Most Boutique	$194,672.42

All in violation of Title 18, United States Code, Section 1341.

COUNT THIRTY-FIVE
(Theft of Government Money)

1. Paragraphs 1 through 36 of Counts One through Nine are incorporated here.

2. From in or about early 2022 through in or about late 2023, in the Eastern District of Pennsylvania and elsewhere, defendant

TIMEEKA LOUD

stole, purloined, and knowingly converted to her own use a thing of value of the United States in the amount of over $1,000, that is, U.S. Treasury checks totaling approximately $4.5 million.

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1341 and 641, as set forth in this information, defendant

TIMEEKA LOUD

shall forfeit to the United States of America any property, real or personal, constituting, or derived from, proceeds obtained traceable to such violations, including, but not limited to $4,570,730.24, and:

(a) 601 W. Chelten Avenue, Philadelphia, Pennsylvania 19126; and

(b) the proceeds listed in Attachment A.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(c) cannot be located upon the exercise of due diligence;

(d) has been transferred or sold to, or deposited with, a third party;

(e) has been placed beyond the jurisdiction of the Court;

(f) has been substantially diminished in value; or

(g) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

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

DAVID METCALF
UNITED STATES ATTORNEY

ATTACHMENT A

1.	LV Reykjavik Scarf, with tag in LV box
2.	Chanel black Lace-Up boots, Size 42 in Chanel box
3.	LV Isla Flat Mule, Size 41in LV bags in LV box
4.	Dolce & Gabbana Cropped Script Print Puffer Jacket
5.	Dior D-Connect Sandal, Chartreuse, Size 42 in Dior bags in Dior box
6.	Chanel white/golden/black Lambskin Lace-up Boots, size 42, in Chanel bags in Chanel box
7.	Hermes White Oran Sandal, Size 42, in Hermes bag
8.	Versace Pink Medusa Heels, Size 39.5 in Versace box
9.	Balenciaga Purple Track Sneaker, Size 38
10.	Versace Gold Chain belt
11.	Chanel Gold Tone Pearl & Crystal Coco Charm Choker
12.	Chanel Square Pearl CC Earrings
13.	2 Unknown Gold Chain Bracelets
14.	LV Sunset Comfort Flat Sandal (1), in LV bag in LV box, with Receipt
15.	LV Monogram Shearling Espadrilles
16.	LV Monogram Petite Valise, in LV bag in LV Box
17.	Gucci Cosmos Softy Leather Sandals, Black, Size 41, in Gucci Bag in Gucci Box
18.	Versace Yellow Fluo Dark Grey Sunglasses in case in Versace Box in Versace Bag
19.	LV Cherry Blossom Retro Sac Shoulder Bag, Tinisha Loud SSN card inside
20.	Dior Neo Prene Rubber Sneakers in Dior bag in Dior box, Size 41.5
21.	Chanel Rare Vintage 1997 Floral Turquoise Quilted Logo CC Classic Kelly Flip Bag in Chanel Bag w/ authenticity card
22.	Chanel Vintage 90s Maxi Jumbo Quilted Denim CC Logo Turnlock Bag in Rebag bag
23.	Chanel 2014 Supermarket Candy Long Pastel Multicolor Necklace
24.	Chanel Resin CC Dangle No 5 Clip on Drop Earrings Gold/Pink
25.	Chanel Sports Set Accessories (Beach Bath Towel, 2 wrist bands, hairband)
26.	Chanel Shealing Lambskin Mules size 41 w/ receipt in Chanel Box
27.	Chanel Cashmere Leggings size 4; in dry clean bag with tag
28.	Chanel 21A Black Stretch Velvet CC Logo Symbol Leggings size 48; in dry clean bag with tag
29.	Chanel Ensemble Chanel Cuir Violet coat
30.	Gucci Women's Blouse
31.	Fendi Intero Shiny Lycra
32.	LV S/Less T-shirt Dress W/ Shoulder Chain
33.	Fendi Orange Embossed FF Crop Top w/ dry clean tag
34.	Balenciaga Crystal Embellished Printed Wool Top size L
35.	Givenchy Stretch Lace Pants Baby Blue size L with Saks 5h Ave tag
36.	Gucci Velvet Jacket
37.	LV L/S Masculine Pajama Shirt

38.	LV Mini Sports Shorts size 42
39.	LV Monogram Windbreaker
40.	Dolce & Gabbana Spandex Top and Bottom Set
41.	Versace Jeans Couture Leggings purple/crimson
42.	Versace Jeans Couture Black Mesh/Knitted Shirt
43.	Chanel Sunvisor
44.	Chanel Iconic Vintage 1996 Pink Velour CC Logo Jacket w/ Sleeveless Dress Set
45.	Versace Black Biker Shorts
46.	Chanel 22P Mademoiselle Coco Sling Blue Denim Slingback Ballet Flat in Chanel Box
47.	LV Brown Vinyl Plus Cruise Tote with Receipt from 'WGACA"
48.	Chanel Orange Logo Terrycloth Shoulder Bag in Chanel Box
49.	Chanel Visor, in Chanel bag in Chanel Box
50.	Chanel Multi Vinyl Flap Maxi bag, in Chanel bag in Chanel Box
51.	Chanel Black Wool Handwarmer and Headband in Chanel bag
52.	Chanel Purple bag with WGACA Receipt in Chanel bag
53.	Chanel Straw Raffia Newsboy Cap, in Chanel bag in Chanel Box
54.	Chanel Red Alligator Half Flap Jumbo Bag, in Chanel bag in Chanel Box with Receipt and Authenticity
55.	Fendi Hot Pink Logo Leggings
56.	Chanel Gold Metalic Logo Leggings, with Dry Cleaning Tag
57.	Chanel Pink Jumpsuit, with Dry Cleaning Tag
58.	Chanel Black Swimsuit with Chanel Bag with Tag
59.	Chanel Fuschia Knitted Pants with Tag
60.	Chanel Fuschia/Pink/White Swim Top, with Tag
61.	Chanel Cashmere Logo Scarf Multi-color on Dry cleaning hanger
62.	Chanel Wool Cardigan Blue
63.	Chanel Vintage XL Jumbo Stitch Flap Bag Yellow Patent Leather
64.	Chanel Black High Boots in Chanel bags in Chanel Box
65.	Chanel Tweed and Calfskin Black/Pink/Ecru High Boots, in Chanel bag in Chanel Box Size 42
66.	Chanel Racket Holder Bag Pink in Chanel bag in Chanel Box with Tag
67.	Gucci Satin Shawana Flower Sandals Shine Yellow , Size 42, in Gucci bags in Gucci Box
68.	Hermes Brown Oran Sandal, in Hermes bag in Hermes Box, Size 42
69.	Versace Leggings Multi-color
70.	Chanel Clutch Paris Hamburg Lucite Shipping Container Shoulder Bag in Chanel Bag
71.	Versace Vintage Tank Top Marilyn Monroe Print
72.	Versace Vintage Jacket Marilyn Monroe Print
73.	Chanel Vintage Logo Swimwear Dress One-Piece
74.	Gucci Black One Piece Swimsuit with Dry Cleaning Tag
75.	Chanel Vintage Logo Neon Yellow Romper with Drycleaning Tag
76.	Chanel Black/White Cashmere Shawl with Drycleaning Tag
77.	Versace Greca Pleated Tennis Skirt Black

78.	Versace Greca Gym Tank Top Black
79.	Fendi Rama Embossed Logo Fitness Top
80.	Chanel Black/White Nautical Top
81.	Chanel Mary Janes Short Boots Black/Silver, Size 42, in Chanel Bag in Chanel Box
82.	Chanel Perforated Jumbo Easy Flap Bag, in WGACA Bag in Chanel Box with Certificate
83.	Chanel Red/Purple Resin CC Dangle Earrings
84.	Chanel Leather Mules/Clogs, Black, Size 42, in Chanel bags in Chanel Box
85.	Chanel Ivory/Black/Red Cloche Hat in Chanel Box
86.	Chanel Mules Perles, Size 42, in Chanel Bags in Chanel Box with Neiman Marcus Invoice
87.	Chanel Rose Mules, Size 42, in Chanel Bags in Chanel Box with Saks 5th Ave Invoice
88.	LV Isola Flat Mule, Size 41, in LV Bags in LV Box with LV Receipt
89.	Dolce & Gabbana Beachwear Gomma, Pink, Size 41, in DG Bag in DG Box
90.	Chanel Light Blue Vest with Logo, Size 42, with Tags
91.	Chanel Yellow Dress, Size 40, with Tags
92.	Chanel Cardigan Green/Black/Burgendy, Size 38,with Tags on Chanel Hanger in Chanel Garment Bag
93.	Chanel 2021 Silk Blouse, Size 50
94.	4 Chanel Garment Bags
95.	Chanel 1 Piece Swimsuit Black/Gold Stars, Size 48, with Chanel Tag in Chanel Garment Bag
96.	Chanel Charcoal/Silvery Dress, Size 40, with Chanel Tag in Chanel Garment Bag
97.	Versace Jeans Couture Pink Tote
98.	Saks 5th Ave Shopping Bag
99.	LV 2021 Straight Leg Pink/Purple Jeans, Size 36, in LV Bag
100.	Neiman Marcus Make the Moment Christmas Book 2022 in LV Bag
101.	Gucci Vintage 2003 Fur Jacket
102.	Versace Ventagli-Print Fitted Single Breasted Blazer
103.	Gucci Red Logo Velvet Wristlet
104.	Chanel Espadrilles Lambskin Black, Size 42, in Chanel Bag in Chanel Box
105.	Balenciaga Pink Hoodie
106.	Chanel Pink Python Milk Carton Clutch in Chanel Bag in Chanel Box with WGACA Tag and Authenticity Card
107.	Fendi Reversible One Piece Swimsuit, Size 48, with Fendi Tag in Fendi Bag
108.	Dolce & Gabbana Football One Piece Swimsuit
109.	Dolce & Gabbana Football Beach Hat
110.	Chanel Shopping Bags and Wrapping Accessories
111.	Chanel Mules Beige, Size 41.5, in Chanel Bags in Chanel Box with Bergdorf Goodman Receipt
112.	Chanel Lace-up Boots in Chanel Bags in Chanel Box
113.	LV Bom Dia Flat Mules
114.	Chanel Multi-Color Knit Fabric/Suede Sneakers, Size 38
115.	Balenciaga Triple S Sneakers, Beige, Size 38 in Balenciaga Bags in Balenciaga Box

116.	LV Limited Edition LV Twist Wallet
117.	Gucci Keyring Eyewear, with Gucci Bag in Glasses Holder with Authenticity Card
118.	Chanel Vintage Strass Magnifying Necklace in Chanel Box in WGACA Bag in Chanel Shopping Bag
119.	Chanel Shield Sunglasses, Black/Pink, in Chanel Case, in Chanel Bag in Chanel Box
120.	LV 2023 Cyclone Sunglasses in LV bag in LV Box
121.	Chanel Caviar Long Wallet
122.	LV Nanogram Cuff Bracelet in LV Bag in LV Box
123.	Chanel Vintage Barrette in Chanel Box in WGACA Bag
124.	Fendi Graphy Oval Sunglasses in Fendi Bag
125.	Christian Dior Alek Shield Sunglasses in Christian Dior Case
126.	Chanel 2022 Interlocking CC Logo Sunglasses in Chanel Case
127.	Chanel Interlocking CC Logo Square Sunglasses in Chanel Case
128.	Cartier Eyewear Sunglasses in Cartier Case in Cartier Bag in Cartier Box
129.	Christian Dior Princess Ring- Makeup Jewel
130.	Fendi Swimsuit Bag
131.	Chanel Accesory
132.	Chanel Crochet Black Hat with Tag in Chanel Box
133.	Chanel 2019 Transparent Resin Beads Layered Necklace in Chanel Box
134.	Chanel 2022 Leather Belt in Chanel Box
135.	Balenciaga Sneakers in Balenciaga Bag in Balenciaga Box with Saks 5th Ave Receipt
136.	LV Maya Metalic Gold Sneakers in LV Box
137.	LV Gold Mirror Alma MM Purse with WGACA Tag inside
138.	Chanel Mary Janes Short Boots Black/White, Size 42, in Chanel Box
139.	2 Empty Chanel Boxes
140.	Gucci X Disney Fedora
141.	LV YaYoi Kusana Archlight Chunky Sneakers
142.	Gucci Leather Upper and Rubber Soul Apollo in Gucci Box
143.	Chanel Tweed Pattern Lace-up Boots in Chanel Bags
144.	Chanel White Caviar New Classic Jumbo Bag with WGACA Receipt and Authneticty Card in WGACA Bag
145.	Chanel Silvery Shorts with Tag Wrapped in Tissue Paper
146.	LV & Takashi Murakami Purse in LV Bag
147.	Chanel Sneakers, White/Silver/Blue, Size 42, in Chanel Box
148.	Chanel Classic Jumbo Doubleflap Bag, Turqoiuse, in Chanel Bag in Chanel Box with Authenticity Card
149.	Nataetroceline LLC Bulk Advertisements & Business Stamp
150.	Valuation Report Documents from the Real Real for LV Jewlery
151.	Christian Dior Vintage Pink/White Oblique Canvas Trotter Bag
152.	LV Multi-color Monogram Jumbo Bag
153.	LV Vintage Multi-Color Leonore Bag, with 2 Debit Cards (TD Bank for Nataetroceline/Tinisha Loud & Citizens for Meeka Care/Tinisha Loud) and State of PA EBT Card for Tinisha Loud and Netspend Pre-paid Debit Card in Tinisha Loud's name

154.	LV Monogram Vernis Spring Street Vintage Bag
155.	Chanel Black Leather Snow Boots, Size 41-a43, with Vestiaire Collective Tag
156.	LV Keepall Bandouliere 55 Bag
157.	Chanel Vintage 1994 Waist Belt
158.	Chanel Coco Mark Sneakers Suede Fabric Ivory/Black, Size 38
159.	Versace Purple Medusa Ankle Strap High Heel Pumps, Size 38.5 in Versace Box
160.	Versace Wide Leather Waist Belt
161.	LV 1.1 Millionaires Sunglasses
162.	LV Monogram Canvas Sneakers
163.	LV Ruby Flat Ankle Boot, Size 38
164.	LV Ceintura Reverseable Belt in LV Box
165.	Christian Dior Silk Shirt
166.	Christian Dior D-wander Slide, Size 38, in Dior Box
167.	LV Blooming Supple Brass Charm Bracelet
168.	Chanel Tweed and Patent Calfskin Light Purple, Pink ans Red Sandals in Chanel Box with Saks 5th Ave Receipt
169.	LV Small Handbag
170.	Chanel Calfskin White/Black Ankle Boots, Size 38, in Chanel Bag in Chanel Box
171.	Gucci Wool Beanie, Grey with Red/Navy Stripe in Gucci Box
172.	Chanel Vintage Necklace Cocomark Resin Multi-color in Box
173.	Rolex Blu SS Oysprptl Watch, Model # 277200, with Certificate in Rolex Box
174.	Chanel Pearl Necklace in Chanel Necklace Holder
175.	Chanel CC Logo Earrings in Box
176.	Chanel Iridescent CC Logo Earrings, Turquoise, in Box
177.	Chanel Coco Monogram and Coin Chainlink Bracelet with Leather Cord in Chanel Box
178.	Chanel Paris Couture 1990's Extra Long Black Enamel Bows Camellia Pearl Earrings in Chanel Box
179.	Chanel Vintage Earrings in Chanel Box
180.	Hermes Clic Space H Bracelet in Chanel Box
181.	Cartier Jewlery & Watch Lotion in Cartier Box, Empty Cartier Box
182.	Chanel Rare Black/Gold Leather Chain Necklace in Chanel Box
183.	Chanel Fall 2004 Perfume & Cosmetic Charms Sautoir Necklace in Chanel Box
184.	Chanel Iridescent CC Logo Earrings, Red, in Chanel Box
185.	Chanel Dark Blue Classic Flap Card Holder in Chanel Pouch in Chanel Box with Tag
186.	Chanel Strass Glitter CC Logo Resin Earrings in Chanel Box
187.	Chanel Gold/Black/Crystal Brooch in Chanel Pouch in Chanel Box with Tag
188.	Chanel CC Logo Lucite Pink XL Earrings in Chanel Box
189.	Chanel CC Logo Iridescent Light Pink in Chanel Box
190.	Unknown Chanel Earrings - one piece each - in Chanel Box
191.	Chanel CC Disc Earrings in Chanel Box
192.	Chanel CC Logo White Resin Earrings XL in Case
193.	Chanel CC Logo Black Resin Earrings XL in Case
194.	Chanel Vinatge Rare Lips & Kisses Jumbo Maxi Flap in Chanel Bag
195.	Chanel 08A CC Logo Knit Gloves, Black, in WGACA Bag

196.	Chanel Throw Blank with CC Logo
197.	Chanel Lace-up Boots, Pink/Black in Chanel Bags in Chanel Box with Saks 5th Ave Receipt
198.	LV Pink Sandals in LV Bag
199.	Chanel Baby Blue Lego Clutch in Chanel Bag
200.	Chanel Glass N5 Perfume Bottle Snow Globe in Chanel Bag
201.	Chanel Embroidered Clutch with Chain, Black/Gold in LV Bag with Certificate of Authenticty & Tag
202.	Chanel Vinatge 93P Large Letter Logo Runway Belt
203.	Chanel Nylon Canvas 2Way Waist Bag with Certificate of Authenticity in Chanel Bag
204.	Dolce & Gabbana Calfskin Nappa Daymaster Sneakers, Customed with "Natae" on back, in DG Bag in DG Box
205.	Chanel Caviar Quilted Large Clutch
206.	Balenciaga Metallic Arena Silver Sandals, Size 42, in Balenciaga Bag in Balenciaga Box
207.	Fendi Baguette Mink Fur Slides, Size 41, in Fendi Bags, in Fendi Box
208.	Fendi FF Logo Toggle Slides, One Shoe, in Fendi Bag in Fendi Box
209.	Hermes Clic H Bracelet in Hermes Box
210.	Hermes Oran Sandals, Blue, Size 42.5, in Hermes Bag in Hermes Box
211.	Hermes Shearling Sandal, Orange, Size 41 in Hermes Bags in Hermes Box
212.	Hermes Oran Woolskin Sandal, Size 41, in Hermes Box
213.	Chanel Gold Hairclip with WGACA Tag in Chanel Box
214.	Chanel Lambskin Light Pink Sandals, Size 41.5, in Chanel Box with Chanel Bags with Chanel Receipt
215.	Chanel Patent Leather Espadrilles, White, Size 42, in Chanel Box
216.	Chanel Raffia & Strass Black with Rhinestone CC Logo Mules, Size 42, in Chanel Box with Chanel Bags
217.	Chanel Raffia & Strass White with Rhinestone CC Logo Mules, Size 42, in Chanel Box with Chanel Bags
218.	Chanel Shearling Lambskin Black Mules, Size 42, in Chanel Box with Chanel Bags
219.	Chanel Dad Camellia Sandals , Black/White
220.	Chanel Pink/Black Gaiters, in Chanel Box with Tag
221.	Chanel Resin Long CC Bead Necklace in Chanel Necklace Holder
222.	Chanel Knit Dad Sandals, Pink, Size 41, in Chanel Box
223.	Chanel Fabric & Laminated Black/Purple/Burgundy Sneakers, Size s41,5, in Chanel Box
224.	Chanel Black Stole with Multicolor CC Logo wrapped in Chanel Box with Bergdorf Goodman Receipt
225.	LV Fiction Mask Mens Sunglasses Silver with Saks 5th Ave Receipt
226.	Chanel Blouse, Light Yellow with Chanel Tag
227.	Chanel Cardigan Ecru with Chanel Tag in Chanel Garment Bag
228.	Chanel One-Piece Swimsuit Black/White with Chanel Tag
229.	Chanel Long Cardigan Red, Size 40
230.	Chanel 2022 Trench Coat

231.	Chanel Dad Sandals , Blue, Size 42, in Chanel Box
232.	Gucci Calfskin Ayers Web Crystal Loved Sneakers in Gucci Bags in Gucci Box
233.	Chanel Towel Bag Black with Pouch and Towel
234.	Chanel Vintage 1995 Barbie Blue Patent Heart Mirror Vanity Case Bag in Chanel Bag
235.	Various Shopping Receipts
236.	Chanel White Marble Crossbody Bag in Chanel Bag
237.	Balenciaga Glitter Handbag in Balenciaga Bag
238.	Christian Dior White Letter Newsprint Mini Bag with WGACA Tag in WGACA Bag
239.	Chanel Vintage Limited Edition Red Lucite Heart Clutch
240.	Chanel Velvet Medium Double Flap Bag with Certificate of Authenticity
241.	Chanel Vintage Graffiti Crème & Multicolor Mini Square CC Logo Bag in Chanel Bag
242.	LV Silk Monogram Scarf
243.	Chanel 1995 Vintage Heart Handle Bag Quilted Patent Leather Pink with Certificate of Authenticity
244.	Chanel Headwear with Beads in Fashtionphile Bag
245.	Dior Limited Edition Vintage Coi Satin Saddle Bag in LXY Boutique Bag
246.	LV High-Top Denim Monogram Sneakers in LV Bags
247.	Gucci Black Leather Fur Mules in Gucci Bag
248.	Chanel Terry Cotton CC Beach Towel Set in WGACA Bag
249.	Chanel Reversible CC Throw Blanket
250.	Chanel Velvet & Shiny Calfskin Blue/Black Lace-up Boots, Size 42, in Chanel Bags in Chanel Box
251.	Chanel White/Black Short Boots, Size 42, in Chanel Box with Saks 5th Ave Shipping Receipt
252.	Chanel Canvas CC Hightop Sneakers Black/White, Size 41, in Chanel Box with Chanel Bag
253.	Chanel Vintage 90's Vanity Case Mini in Chanel Bag in Chanel Box
254.	Chanel Metallic Lambskin LED Small Boy Flap Silver Handbag in Chanel Bag in Chanel Box
255.	Chanel Lambskin White Lace-up Shoes, Size 42, in Chanel Box with Chanel Bags with Bergdorf Goodman Receipt
256.	Chanel Funny Tweed Patchwork Tote Pink with The Real Real Tag
257.	Chanel No. 5 Canvas Chain Tote with The Real Real Tag
258.	Chanel Coral/Pink/Ivory Leather Caviar Skin Tote
259.	Chanel Certificate of Authenticity for Green Caviar Petite Shopping Tote
260.	Chanel Beige Quilted Lambskin Old Medium Double Flap Gold Hardware w/ authenticity card #17429150
261.	Red Chanel Patent Leather Trainers in Chanel bags in Chanel box size 41.5
262.	(1) Fendi Feel Fabric Brown Slide 42 in Chanel box
263.	Chanel Multicolor Thong Sandals in Chanel Box
264.	Chanel Cropped Jacket Black
265.	Chanel Vintage 2009 Red Patch Velour Sweater Top size 44
266.	Chanel Tanktop Multicolor size 40

267.	Chanel Gray Linen Straight Pants size 38
268.	Chanel 2021 Polka Dot Print Evening Shirt
269.	Chanel Multicolor Polyster Top
270.	Chanel Tan Biker Shorts w/dry clean tag
271.	Chanel 2023 Printed Denim Jacket size size 42
272.	Chanel Pink Dress size 42 w/ Chanel tag
273.	Chanel Dark Grey Pants size 40 w/ Chanel Tag
274.	Chanel Ivory/Pink/Fuchsia/Burgandy Jacket Size 50 w/ Chanel Tag
275.	Chanel Ivory/Pink/Fuchsia/Burgandy Pants size 40 w/ Chanel Tag
276.	Chanel 2019 Paris New York Graphic Tshirt size 50
277.	Chanel 2021 Orange Loungeware size 38
278.	Chanel Pink 2019 La Pausa size 50
279.	Chanel White and Orange Tshirt size 42/44 w/ Chanel Tag
280.	Chanel Black/Silvery Tshirt size XL w/ Chanel Tag
281.	Chanel Pink Silk Puffer
282.	Chanel 2021 Printed Polo Black/Pink size XL
283.	Chanel White Top size 50 w/ Chanel Tag
284.	Chanel 2023 Paris Monte Carlo Coat size 50
285.	Chanel Legwarmers
286.	Chanel Black/Multicolor size 42 w/ Chanel Tag
287.	Chanel 2023 Graphic Print Crop Top size large
288.	Chanel Vintage Metallic/Silver CC Logo Longsleeve Top
289.	Chanel Black Leggings size XL w/ Chanel Tag
290.	Versace Fruit and Butterfly Print Mini Dress
291.	Chanel 2021 Wide Leg Black Pant size 48
292.	Chanel Blue Denim 1991 Hip Hop Collection Runway Jacket size 42
293.	Chanel Preowned 1990-2000s Oversized Yellow Jacket size 42
294.	Chanel X Pharrell Tshirt w/ Chanel and The Luxury Closet Tags
295.	Chanel Silk Shirt size 36
296.	Chanel Multicolor Quilted Printed Pullover
297.	Chanel Authentic Dress size 38
298.	Chanel Light Pink Iridescent Shirt size 40 w/ Chanel Tag
299.	Chanel White and Black Tshirt size XL w/ Chanel Tag
300.	Chanel 1996 Printed Rogue Shirt Button Up size 49
301.	Chanel Black White Dove Ruffel Blouse size 42
302.	Chanel 1989 Baseball Jersey size 38
303.	Chanel Multicolor Print Shirt size 42
304.	Chanel White/Black Robe size M w/ Chanel Tag in Chanel garmet bet
305.	Chanel Black Lace-Up boots, size 42 in Chanel bags in Chanel box
306.	Chanel Red Access Handbag w/ Saks 5th Ave Receipt
307.	Chanel (8) empty boxes; (1) bag
308.	Chanel Green/Pink/Blue Sandals size 41 in Chanel Box
309.	Chanel Multicolor/Black Sandals size 41 in Chanel Box

*No.*_ _ _ _ _ _ _ _ _ _

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

TIMEEKA LOUD

INFORMATION

Counts

26 U.S.C. § 7206(2) (aiding and assisting in the preparation of false tax returns – 9 counts)
18 U.S.C. § 1341 (mail fraud – 25 counts)
18 U.S.C. § 641 (theft of government money – 1 count) Notice of forfeiture

A true bill.

_____
Foreperson

Filed in open court this _____day,
Of _____A.D. 20_____

_____
Foreperson

Bail, $_____