

FILED
25 SEP 25 PM 4:34

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY RAWLS,

Defendant.

) INDICTMENT

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CASE NO.

JUDGE:

JUDGE ADAMS

Title 18, Sections 152(3) and 1001(a),
United States Code

COUNT 1
(False Statements)

The Grand Jury charges:

On or about April 15, 2004, in the Northern District of Ohio, Eastern Division,
ANTHONY RAWLS, defendant herein, unlawfully, willfully and knowingly, in a matter within
the jurisdiction of the executive branch of the government of the United States, specifically, the
United States Department of Housing and Urban Development, falsified, concealed, and covered
up by trick, scheme, and device material facts, and further made materially false, fictitious, and
fraudulent statements and representations; to wit: defendant ANTHONY RAWLS signed and
submitted an "Annual/Interim Reexamination Update" in which he stated that his total income

from all sources including employment, self-employment, unemployment compensation, child support, regular contributions, Social Security, SSI, retirement, disability, workmen's compensation, TANF, Veterans Benefits, rental property income, stock dividends, interest, alimony, annuities, and all other sources was \$441.00 monthly from a source described in part as "V.A." when he then and there knew that he was receiving employment income each month from the United States Postal Service in addition to monthly income in the amount of \$441.00.

All in violation of Title 18, United States Code, Section 1001(a).

COUNT 2
(False Statements)

The Grand Jury further charges:

On or about February 22, 2005, in the Northern District of Ohio, Eastern Division, ANTHONY RAWLS, defendant herein, unlawfully, willfully and knowingly, in a matter within the jurisdiction of the executive branch of the government of the United States, specifically, the United States Department of Housing and Urban Development, falsified, concealed, and covered up by trick, scheme, and device material facts, and made materially false, fictitious, and fraudulent statements and representations; to wit: defendant ANTHONY RAWLS signed and submitted a "Participant Recertification Assessment" in which he falsified, concealed, and covered up his last 12 months of work history including name, employer, and gross monthly income and his current employment, including employer's name and gross wages, when he then and there well knew that he was employed by the United States Postal Service and had been so employed during the twelve months referenced in the "Participant Recertification Assessment."

All in violation of Title 18, United States Code, Section 1001(a).

COUNT 3
(False Oath In Bankruptcy)

The Grand Jury further charges:

Between on or about November 10, 2003, and on or about November 12, 2003, ANTHONY RAWLS, defendant herein, in the Northern District of Ohio, Eastern Division, and elsewhere, knowingly and fraudulently made false oaths, declarations, verifications and statements under the penalty of perjury as permitted by Title 28, United States Code, Section 1746, as to material matters in and in relation to a case under Title 11 (the Bankruptcy Code) when he stated on "Schedule I" of his bankruptcy schedules the numbers "0.00" next to "Social Security or other government assistance" when defendant ANTHONY RAWLS then and there knew that he was receiving monthly benefits and government assistance from the Department of Veterans Affairs of the United States.

All in violation of Title 18, United States Code, Section 152(3).

A TRUE BILL.

Original document-Signatures on file with the Clerk of Courts, pursuant to E-government Act of 2002.