

The United States and Defendant Jayrece Turnbull stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below in non-italic text beyond a reasonable doubt. The parties further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.

The statements set forth below in italics are facts that the United States believes it could prove beyond a reasonable doubt, but are statements which are not stipulated to by the Defendant.

Beginning no later than in or about June 2007, and continuing through in or about November 2007, in the District of Maryland and elsewhere, **JAYRECE TURNBULL**, combined, conspired, confederated and agreed with Harriette Walters and others to commit violations of Title 18, United States Code, Section 1956, to wit, knowingly to conduct and attempt to conduct financial transactions which involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and knowing that the transactions were designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

In connection with this conspiracy, on or about June 18, 2007, in the District of Maryland and elsewhere, **JAYRECE TURNBULL** received and possessed securities and money of the value of \$5,000 or more - to wit, check no. 6756040 in the amount of \$410,000, drawn from a District of Columbia government bank account - which crossed a State boundary after being stolen, unlawfully converted, or taken, knowing the same to have been stolen, unlawfully converted, or taken.

TURNBULL, is the niece of Harriette Walters, a former manager within the District of Columbia Office of Tax and Revenue. Beginning no later than 1989, Walters began embezzling monies from the District of Columbia by preparing fraudulent property refund vouchers that listed entities created by Walters' co-conspirators. Illegitimate property refund checks were then issued based on the fraudulent vouchers that were prepared by Walters.

TURNBULL never owned property in the District of Columbia.

In or about 2000, Walters approached TURNBULL and said that Walters could obtain property tax refund checks from the District of Columbia government. Walters said that Walters could arrange for TURNBULL to receive checks, but that TURNBULL had to use a business to receive the fraudulent checks.

TURNBULL and Walters discussed the mechanics of the scheme. Walters explained that TURNBULL would need to meet with someone at a bank of Walters' choosing, deposit a District of Columbia check into a business account, and let the money remain in the account for a period of time. Walters said that, after a period of time, TURNBULL could make withdrawals of up to \$5,000 each. Walters told TURNBULL that, in order for the scheme to be successful,

TURNBULL would need to send a representation to the bank, and that she would have to be polite and professional. Walters and TURNBULL were to share the proceeds of the fraudulent scheme.

Walters also explained that the scheme would be successful because the fraudulent District of Columbia checks would be made payable to a company, as opposed to an individual. Walters said that she would manipulate property records in the District of Columbia Office of Tax and Revenue in order to make the checks appear legitimate. The paperwork supporting the checks would be processed by Walters so that she could maintain control over it.

As part of this scheme, fraudulent District of Columbia checks were deposited by TURNBULL and Walters into bank accounts for which TURNBULL had signatory authority (the "Turnbull accounts"), including accounts for Legna Home Services, First American Home, and Chappa Home Services (entities created by TURNBULL in the course of this scheme). The entities First American Home and Chappa Home Services were created specifically to receive the fraudulent District of Columbia checks.

\$24,521,720.66 in fraudulent checks were deposited into the Turnbull accounts as set forth in the following table:

[table commences on following page]

Date SOAR Approved	Payee 1	Payee 2	Amount
1/18/2001	WASHINGTON I.R.E. INVESTMENT	C/O STUART TUROW, ESQ. HOLD FOR PICKUP	\$ 137,571.33
3/12/2001	PM REALTY GROUP	C/O STUART TUROW HOLD FOR PICKUP	\$ 251,270.50
4/17/2001	HORNING HOUSING CORPORATION		\$ 190,065.38
5/21/2001	JONES LAND LASALLE	ATTN: C.E. ZARNEKE HOLD FOR PICKUP	\$ 135,269.34
6/11/2001	MONUMENT REALTY GROUP	ATTN: DAVID FUSS, ESQ. HOLD FOR PICKUP	\$ 105,217.46
7/27/2001	STILLMAN GROUP		\$ 141,345.99
7/27/2001	INTREPID EYE STREET, LLC	ATTN: C.L. ALEXANDER	\$ 122,078.21
10/5/2001	DELOITTE AND TOUCHE PROPERTY MANAGEMENT	ATTN: DAVID A. FUSS, ESQ.	\$ 262,167.75
12/19/2001	INSIGNIA/ESS, INC	ATTN: JEFF NADEL, ESQ.	\$ 145,145.32
3/27/2002	JONES LANG LASALLE, INC.	C/O WILES AND ARTIS HOLD FOR PICKUP	\$ 222,303.28
4/14/2002	WYNTER AND ASSOCIATES, INC	C/O WILES AND ARTIS HOLD FOR PICKUP	\$ 74,299.20
10/18/2002	PIPER RUDRICK [SIC] PARTNERSHIP	C/O LENA HOME SERVICES HOLD FOR PICKUP	\$ 225,835.05
10/29/2002	CAPTOL COMMONS	C/O ALEXANDER POPE HOLD FOR PICKUP	\$ 134,095.89
11/8/2002	CAPMARK SERVICES, INC	LEGNAHOME TAX SERVICE CORP	\$ 271,045.02
12/20/2002	TRIZECHAHN INC, LLC	C/O LEMOSHOMES SERVICES HOLD FOR PICKUP	\$ 375,466.75
1/7/2003	LEGNAHOME SERVICES, INC	ATTN: C.L. ALEXANDER, ESQ. HOLD FOR PICKUP	\$ 179,184.72
3/1/2003	MONUMEN REALTY, LLC	C/O WILES AND ARTIS ESQ. HOLD FOR PICKUP	\$ 250,000.00
3/24/2003	BOSTON PROPERTIES, INC	LEGNAHOME SERVICES HOLD FOR PICKUP	\$ 290,646.95
3/27/2003	CHARLES E SMITH REALTY GROUP	C/O LEGNAHOMES SERVICES, INC. HOLD FOR PICKUP	\$ 242,606.00
4/23/2003	TRAMMELL CROW COMPANY	C/O LEGOHOMES SERVICES LLC. HOLD FOR PICKUP	\$ 258,590.35
5/20/2003	BERNARD S. GEMIRZ, CO	C/O LEGNAHOME SERVICES, INC. HOLD FOR PICKUP	\$ 248,801.08
6/13/2003	LEGNAHOME SERVICE, INC	C/O DAVID FUSS, ESQ.	\$ 338,088.00
7/1/2003	BELLARMINI DESIGN GROUP	C/O SHRODER R.E. ATTN: DAVID FUSS, ESQ.	\$ 284,165.00
7/21/2003	1511 K STREET PARTNERSHIP	C. [SIC] DAVID FUSS ESQ.	\$ 157,732.85
7/22/2003	18 ASSOCIATES LIMITED PARTNERSHIP	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$ 392,261.00
8/25/2003	1500 K STREET, LLC	C/O LEGNA HOMESERVICES, INC. WILES AND ARTIS/DAVID FUSS, ESQ.	\$ 176,400.00
8/29/2003	1201 F STREET, LLC	C/O WILES ARTIS/DAVID FUSS, ESQ. HOLD FOR PICKUP	\$ 379,600.10
9/15/2003	THE JDG COMPANIES	C/O STUART TUROW/WILES ARTIS. HOLD FOR PICKUP	\$ 177,665.49
10/9/2003	CAPMARK SERVICE, LP	C/O LEGNAHOME SERVICES 245 PEACH TREE CENTER	\$ 180,663.60
11/28/2003	TREMCO, LP	C/O STUART TUROW, ESQ. HOLD FOR PICKUP	\$ 241,210.77
11/28/2003	TRAMMELL CROW COMPANY	C/O STUART TUROW, ESQ. HOLD FOR PICKUP	\$ 225,686.00
12/5/2003	THE MARK WINNLER COMPANY	C/O DAVID FUSS/WILES AND ARTIS, ESQ.	\$ 127,187.56
1/9/2004	2011 LAND, LTD	WILES ARTIS, ESQ. HOLD FOR PICKUP	\$ 195,655.24
1/12/2004	KAEMPFER MANAGEMENT, LLC	C/O LEGNAHOMES SERVICES	\$ 295,359.80
1/30/2004	LEGNAHOME SERVICE	C/O DAVID FUSS, ESQ.	\$ 357,800.00

ALL NAMES ARE LISTED AS THEY APPEARED ON DISTRICT OF COLUMBIA OFFICE OF TAX AND REVENUE DOCUMENTS

2/18/2004	BELLARMI ASSOCIATES, INC	KAEMPER MGMT SVC HOLD FOR PICKUP	\$	335,000.00
3/79/2004	BTODKELFDD INC, LTD	C/O WILKES ARTIS, ESQ. HOLD FOR PICKUP	\$	346,700.00
4/13/2004	BOSTON PROPERTIES	C/O WILKES ARTIS, ESQ. HOLD FOR PICKUP	\$	271,045.02
5/28/2004	GRUBB AND ELLIS	C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$	202,263.76
5/28/2004	TROMMEL CROW CORP	C/O WILKES ARTIS, LLC HOLD FOR PICKUP	\$	324,000.00
6/23/2004	CARRREALTY GROUP, INC	C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$	368,000.00
6/23/2004	CAPTAINCO AMERICA, LLC	C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$	324,416.91
7/9/2004	PRINCIPAL FINANCIAL PARTNERS	C/O LEGNAHOME SERVICES, INC. HOLD FOR PICKUP	\$	264,429.22
7/20/2004	TOWERCONSTRUCTION CIMAONY, INC	C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$	452,620.99
8/10/2004	2001 ASSOCIATED CROW, UX	C/O LEGNAHOME SERVICES, INC. HOLD FOR PICKUP	\$	360,870.00
8/20/2004	19TH AND K VENTURE	C/O WILKES ARTIS, LLC HOLD FOR PICKUP	\$	388,200.96
10/29/2004	TRAMMEL CROW CORP	C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$	333,981.65
11/12/2004	BILKEMOR LLC REAL ESTATE, INC	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	346,700.00
12/3/2004	MONUMENT REALTY GROUP LLC	C/O LEGNAHOME SERVICES	\$	465,509.49
12/10/2004	CWC PENN, LLC	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	367,025.00
12/10/2004	PAOST MASS AVE, LLC	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	319,339.89
12/27/2004	PENN AVE PROPERTIES GROUP, LLC	C/O LEGNAHOME SERVICES HOLD FOR PICKUP	\$	369,580.16
12/27/2004	K STREET BROU, LLP	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	340,900.00
1/7/2005	MASS AVE, LLC	LEGNAHOME SERVICES, INC HOLD FOR PICKUP	\$	223,593.11
1/7/2005	SUMMITT PROPERTIES	C/O CHAPAHOME, LLC HOLD FOR PICKUP	\$	338,772.62
1/21/2005	111 13TH STREET, LLC	C/O CHAPPAHOME SERVICES, INC. HOLD FOR PICKUP	\$	397,007.00
2/25/2005	1301 LIMITED PARTNERSHIP	C/O CHAPPAHOME SERVICES, INC. HOLD FOR PICKUP	\$	350,000.00
3/27/2005	JAD ASSOCIATES, INC	C/O CHAPPAHOME SERVING HOLD FOR PICKUP	\$	379,000.00
4/15/2005	BWG, LLP	C/O WILKES AND ARTIS, LLC HOLD FOR PICKUP	\$	329,913.31
5/26/2005	FRANKLIN TOWERS, LLP	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	356,900.00
5/20/2005	LASALLE PARTNERSHIP, LLP	C/O WILKES ARTIS HOLD FOR PICKUP	\$	340,000.00
6/24/2005	CARFRTZCOMPANY	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	410,900.00
7/11/2005	BREBLACKTHORNE REALTY	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	344,625.59
7/25/2005	TRAMMEL CROW COMPANY	C/O WILKES AND ARTIS STUART TUROW, ESQ. HOLD FOR PICKUP	\$	225,686.00
9/13/2005	SECOND STREET	C/O WILKES ARTIS STRENT, TUROW ESQ. HOLD FOR PICKUP	\$	301,196.00
10/6/2005	BGEE LLP/CHAPPA HOME	C/O WILKES ARTIS HOLD FOR PICKUP	\$	329,913.31
10/6/2005	FUND III GMBH AND CO KE LLP	C/O DAVID FUSS HOLD FOR PICKUP	\$	373,005.00
11/10/2005	JACKSON-CAMPBELL, LL	CHAPPAHOME DESIGN, INC HOLD FOR PICKUP	\$	234,227.20
11/10/2005	PROPERTY DEVELOPMENT CORP, LLC	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	422,890.00
12/9/2005	COLLIER INTERNATIONAL, LLC	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP200	\$	348,000.49
12/29/2005	THIRTEEN STREET ASSOCIATES	C/O CHAPPHOME, INC HOLD FOR PICKUP	\$	380,000.00
2/5/2006	BLAKE COMPANY, LLC	CHAPPAHOME INC HOLD FOR PICKUP	\$	346,800.00

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2/6/2006 SRANN COMPANY	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	325,000.00
3/3/2006 1425 F STREET, LLC/CHAPPAHOME, LLC	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	356,900.00
4/6/2006 STOLADI PROPERTY GROUP	C/O CHAPPA HOME INC	\$	385,700.00
5/12/2006 MRL POST, LLC	C/O CHAPPAHOME LIMITED, HOLD FOR PICKUP	\$	387,900.00
6/1/2006 12TH STREET PROPERTIES	C/O BELARMIN DESIGN GROUP HOLD FOR PICKUP	\$	456,990.00
8/24/2006 1120 VERMONT STREET ASSOCIATES, LTD	C/O CHAPPAHOME LLC HILD FOR PICKUP	\$	410,000.00
9/18/2006 LINCOLN SQUARE, LLC	CHAPPAHOME DESIGN, LTD HOLD PICKUP	\$	458,670.00
2/2/2007 CHAPPAHOME INC, LLC	C/O JEFF NADEL, ESQ. HOLD FOR PICKUP	\$	465,000.00
4/21/2007 CHAPPAHOME INC	C/O WILKES ARTS, LLC HOLD FOR PICKUP	\$	398,680.00
4/5/2007 FIRST AMERICAN HOME	C/O DAVID FUSS, ESQ. HOLD FOR PICKUP	\$	410,000.00
	TOTAL:	\$	24,521,720.66

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neither she nor any of her businesses was entitled to the proceeds of the checks.

As the scheme progressed, Walters called TURNBULL to say that she needed certain information, which was code language for needing blank checks for TURNBULL's accounts into which fraudulent District of Columbia checks were deposited. TURNBULL sometimes signed blank checks from the business herself, and in other instances Walters signed TURNBULL's name on the checks. Walters and TURNBULL used the checks to move proceeds of the fraudulent scheme to other accounts.

As part of the scheme, Walters directed TURNBULL to obtain the assistance of Walter Jones, an assistant branch manager at Bank of America, whom Walters had used to conduct financial transactions with the fraudulent checks. Jones conducted both deposit and withdrawal transactions for TURNBULL, who on occasion personally took checks to Jones to negotiate. In addition, between January and September of 2005, TURNBULL wrote personal checks to Jones totaling \$226,000.

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All \$24,521,720.66 deposited into the Turnbull accounts were proceeds of a fraudulent scheme orchestrated by Harriette Walters to embezzle funds from the District of Columbia government. The majority of the funds had moved in interstate commerce because the funds were moved via checks that were generated in the District of Columbia and that were transported into Maryland prior to their deposit.

The following are selected withdrawal transactions conducted in the Turnbull accounts that involved proceeds of the scheme:

DATE	DESCRIPTION	AMOUNT	REFERENCE
3/28/2002	H.W.	\$5,000	PC 1159
3/28/2002	Bank of America	\$20,200	PC 1160
3/29/2002	Bank of America	\$25,000	PC 1161
4/17/02	Cash Withdrawal	\$12,000	Withdrawal Slip
6/11/02	Cash Withdrawal	\$1,000	Withdrawal Slip
6/20/02	Cash	\$3,586.24	PC 1163
6/28/02	Harriette M. Walters	\$9,000	PC 1164

² "PC" indicates a personal check, while "CC" indicates a cashier's check.

DATE	PAYOR NAME	AMOUNT	REFERENCE
11/15/02	B.D.M.	\$5,000	PC 1169
11/19/02	F.R.	\$8,800	PC 1170
11/27/02	Expo Design Center	\$10,161.05	PC 1171
12/2/02	Alethia Grooms	\$2,725	PC 1172
12/13/02	Parball dba Bally's Paris LV	\$1,000	Auto Check
12/13/02	Parball dba Bally's Paris LV	\$1,000	Auto Check
12/13/02	Parball dba Bally's Paris LV	\$1,000	Auto Check
12/13/02	Parball dba Bally's Paris LV	\$3,000	Auto Check
12/13/02	Parball dba Bally's Paris LV	\$3,000	Auto Check
12/13/02	Parball dba Bally's Paris LV	\$3,000	Auto Check
12/13/02	Parball dba Bally's Paris LV	\$5,000	Auto Check
12/16/02	Richard Walters	\$75,000	PC 1173
12/20/02	F.R.	\$7,800	PC 1174
1/10/03	Harriette Walters	\$9,000	PC 1179
1/10/03	Connie Alexander	\$20,000	PC 1181
1/10/03	Connie Alexander	\$20,000	PC 1182
1/16/03	Parball dba Bally's Paris LV	\$5,000	Auto Check
1/16/03	Harriette Walters	\$15,000	PC 1177
1/22/03	Harriette Walters	\$10,000	PC 1178
1/27/03	Harriette Walters	\$15,000	PC 1175
1/31/03	Adore Jewelers	\$10,000	PC 1176
2/4/03	Harriette Walters	\$5,000	PC 1180
3/21/03	J.L.	\$1,000	PC 1183
4/30/03	Richard Walters	\$39,000	CC 0020334
5/15/03	Richard Walters	\$38,900	CC 0020335

10/2002	11/2002	12/2002	1/2003
5/15/03	Richard Walters	\$38,900	CC 0020336
5/28/03	Connie Alexander	\$20,000	PC 1185
5/30/03	J.I.	\$8,000	PC 1186
6/23/03	U.S. Treasury	\$1,259	CC 0020586
1/30/04	Cash Withdrawal	\$50,000	Withdrawal Slip
2/18/04	Connie Alexander	\$51,000	PC 1202
3/2/04	Bank of America Investments	\$20,000	CC 0036042
3/16/04	Harriette Walters	\$10,000	CC 1592429
4/8/04	Connie Alexander	\$10,000	CC 1592911
5/11/04	Harriette M. Walters	\$7,500	PC 1206
5/18/04	Connie Alexander	\$25,000	CC 1593077
5/18/04	Neiman Marcus	\$12,308.84	PC 1207
5/21/04	Connie Alexander	\$20,000	CC 1593078
5/25/04	Adore Jewelers	\$33,322	PC 1208
5/27/04	Harriette M. Walters	\$35,000	PC 1210
6/7/04	Harriette M. Walters	\$49,870	PC 1209
6/8/04	Connie Alexander	\$21,000	CC 1593080
6/15/04	Connie Alexander	\$44,350	PC 1213
6/21/04	AIG Sun America	\$50,000	CC 0036149
6/30/04	Harriette M. Walters	\$65,700	PC 1214
7/12/04	Harriette M. Walters	\$10,000	CC 1575055
7/13/04	Connie Alexander	\$10,200	CC 1575006
7/22/04	H.W.	\$1,000	PC 1212
8/30/04	Harriette M. Walters	\$10,000	CC 1575264
9/9/04	Connie Alexander	\$100,000	CC 1575445

DATE	PAYEE	AMOUNT	ACCOUNT
10/4/04	Harriette M. Walters	\$30,000	PC 1221
10/4/04	Dr. Patricia Steven	\$140,000	PC 1220
10/8/04	Harriette M. Walters	\$20,000	PC 1223
10/14/04	Harriette M. Walters	\$52,000	PC 1224
10/21/04	Harriette M. Walters	\$5,000	CC 1820506
11/5/04	Harriette M. Walters	\$10,000	CC 1820530
11/19/04	Cash	\$130,000	PC 1225
12/1/04	Harriette M. Walters	\$10,000	CC 1819972
12/14/04	Harriette M. Walters	\$100,000	PC 1226
12/14/04	Harriette M. Walters	\$107,000	PC 1228
12/14/04	R.D.	\$50,000	PC 1229
12/24/04	Connie Alexander	\$100,000	PC 1231
12/27/04	Dr. Patricia Steven	\$200,000	PC 1234
12/28/04	Adore Jewelers	\$38,173	PC 1230
1/5/05	Harriette M. Walters	\$42,175.30	PC 1232
1/10/05	Jayrece Turnbull	\$150,000	CC 1820492
2/11/05	Ricardo Walters	\$4,500	PC 1236
2/11/05	Ricardo Walters	\$10,975	PC 1237
2/16/05	Harriette M. Walters	\$35,000	PC 1233
3/1/05	Jayrece Turnbull	\$25,000	CC 1820461
3/28/05	Ricardo Walters	\$10,000	PC 1238
4/8/05	Jayrece Turnbull	\$25,000	CC 1925643
4/8/05	Jayrece Turnbull	\$25,000	CC 1925644
4/8/05	Jayrece Turnbull	\$25,000	CC 1925645
4/8/05	Jayrece Turnbull	\$25,000	CC 1925646

Date	Payee	Amount	Check Number
4/19/05	Harriette M. Walters	\$40,000	PC 1244
4/22/05	Harriette M. Walters	\$50,000	PC 1243
4/25/05	Ricardo Walters	\$5,500	PC 1239
5/3/05	Adore Jewelers	\$18,690	PC 1241
5/3/05	The Bernstein Company	\$2,000	CC 0140165
5/20/05	Harriette M. Walters	\$110,000	PC 1242
5/25/05	J.I.	\$50,000	CC 0150065
5/25/05	J.I.	\$50,000	CC 0150066
5/25/05	Jayrece Turnbull	\$50,000	CC 0150067
5/25/05	Jayrece Turnbull	\$50,000	CC 0150068
5/25/05	Jayrece Turnbull	\$50,000	CC 0150069
5/25/05	Jayrece Turnbull	\$25,000	CC 0150070
5/27/05	Ricardo Walters	\$1,200	PC 1252
6/1/05	Connie Alexander	\$100,000	PC 1245
6/1/05	Neiman Marcus	\$45,000	PC 1246
6/6/05	Cash Withdrawal	\$10,000	Withdrawal Slip
6/7/05	Harriette M. Walters	\$25,000	PC 1240
6/12/05	Apex Construction	\$50,000	PC 1249
6/15/05	Harriette M. Walters	\$149,000	PC 1248
7/1/05	Harriette M. Walters	\$50,000	PC 1247
7/7/05	Cash Withdrawal	\$44,000	Withdrawal Slip
7/7/05	Cash Withdrawal	\$5,000	Withdrawal Slip
7/13/05	Ricardo Walters	\$10,000	CC 0140504
7/18/05	C.R.	\$5,000	CC 2065144

DATE	DESCRIPTION	AMOUNT	REFERENCE
7/25/05	Jayrece Turnbull	\$25,000	CC 2065143
7/25/05	Ricardo Walters	\$10,000	CC 0140505
8/1/05	Harriette M. Walters	\$25,000	PC 1253
8/1/05	Connie Alexander	\$40,000	PC 1255
9/15/05	Jayrece Turnbull	\$6,000	CC 2111047
11/7/05	Cash Withdrawal	\$193,000	Withdrawal Slip
11/30/05	Cash Withdrawal	\$47,890	Withdrawal Slip
12/22/05	Connie Alexander	\$10,000	CC 2061442
12/27/05	C.R.	\$5,000	CC 2061441
12/28/2005	Harriette Walters	\$5,000	CC 2061469
1/6/2006	Connie Alexander	\$25,000	CC 2061472
1/11/2006	Connie Alexander	\$20,000	CC 2061470
1/30/2006	Connie Alexander	\$22,000	CC 2061471
1/30/2006	Ricardo Walters	\$29,000	CC 1375566
2/9/06	Jayrece Turnbull	\$10,000	CC 1376800
2/9/06	Jayrece Turnbull	\$10,000	CC 1376801
3/15/06	Jayrece Turnbull	\$20,000	CC 1375759
3/15/06	Jayrece Turnbull	\$20,000	CC 1375760
3/15/06	Jayrece Turnbull	\$20,000	CC 1375761
3/15/06	Jayrece Turnbull	\$10,000	CC 1375762
3/15/06	Jayrece Turnbull	\$10,000	CC 1375763
3/15/06	Jayrece Turnbull	\$10,000	CC 1375764
3/15/06	Jayrece Turnbull	\$10,000	CC 1375765

DATE	NAME	AMOUNT	REFERENCE
6/19/06	Jayrece Elaine Turnbull	\$50,000	CC 2239233
6/19/06	Jayrece Elaine Turnbull	\$50,000	CC 2239234
9/6/06	Jayrece Turnbull	\$120,000	CC 1376276
10/18/2006	Jayrece Turnbull	\$30,000	CC 2355378
10/18/2006	Jayrece Turnbull	\$15,000	CC 2355379
10/19/2006	C.A.M.F.	\$45,000	CC 2355374
12/4/2006	C.A.M.F.	\$45,000	CC 2355375
12/4/2006	C.A.M.F.	\$45,000	CC 2355376
12/19/2006	C.A.M.F.	\$45,000	CC 2355377
1/25/07	Harriette M. Walters	\$10,000	CC 1377274
2/6/2007	Jayrece Turnbull	\$50,000	PC 5025
2/8/07	Harriette M. Walters	\$45,000	PC 5026
2/20/07	Harriette M. Walters	\$35,000	PC 5027
3/14/07	Harriette M. Walters	\$30,260	PC 5029
3/16/07	Cash Withdrawal	\$6,000	Withdrawal Slip
3/20/07	Jayrece Turnbull	\$10,000	CC 2573719
4/16/2007	Connie Alexander	\$5,000	CC 2359144
4/18/07	Jayrece Turnbull	\$12,067.56	CC 2492152
4/20/07	Harriette M. Walters	\$138,000	PC 5030
6/25/07	Chapa Interiors	\$200,000	PC 1002
7/9/07	Jayrece E. Turnbull	\$19,326.87	CC 6393009424
7/9/07	Jayrece E. Turnbull	\$49,418.77	CC 6393009423
7/12/07	Jayrece Turnbull	\$100,000	CC 0326011580
7/23/07	Jayrece Turnbull	\$20,000	CC 2781152

DATE	NAME	AMOUNT	REFERENCE
8/8/07	Jayrece Turnbull	\$5,000	CC 2781153

Total: \$5,222,758.63

TURNBULL received the proceeds from the transactions referenced above from June 25, 2007 through August 8, 2007 (inclusive) knowing that they were proceeds of a fraud.

TURNBULL conducted the \$5,222,758.63 in transactions from the Turnbull accounts. Specifically, of the transactions listed above, TURNBULL conducted \$202,272.29 in transactions in 2002; \$256,059 in transactions in 2003; \$1,628,423.84 in transactions in 2004; \$1,739,930.30 in transactions in 2005; \$661,000 in transactions in 2006; and \$735,073.20 in transactions in 2007. This was despite TURNBULL's reported adjusted gross income on her federal income tax return of \$57,160 in 2005 and \$65,038 in 2006.

In connection with this scheme, on or about April 5, 2007, Walters created a fraudulent property tax refund voucher (VRRE 3701) for TURNBULL in the amount of \$410,000. The taxpayer name was listed as "First American Home C/O D.F., Esq." The payee address was listed as "Hold for Pick Up." The materials attached to the voucher in purported support of the refund had no relationship with TURNBULL or her business, First American Home. On or about May 23, 2007, the District of Columbia prepared a check to pay the property tax refund associated with VRRE 3701, Bank of America check no. 6756040, drawn on District of Columbia bank account no. 2547, in the amount of \$410,000.

On or about June 18, 2007, TURNBULL deposited that check into an account under her control at a SunTrust bank branch located at the Bowie Town Center Branch in Bowie, Maryland. On or about June 27, 2007, a SunTrust employee spoke with D.F. (the "care of" addressee on District of Columbia check no. 6756040) and determined that D.F. was a real estate attorney who was engaged, in part, in obtaining refunds of property tax overpayments for clients in the District of Columbia. D.F. stated that neither "First American Home" nor TURNBULL was a client of his.

On or about July 9, 2007, a SunTrust employee met personally with TURNBULL and advised her that SunTrust needed information about her business to verify her claim to the funds from the property tax refund in check no. 6756040. TURNBULL was asked to provide copies of business tax returns, a business license, and any bank references. On or about July 10, 2007, SunTrust asked TURNBULL to provide documentation, such as articles of incorporation, to prove that she was an authorized agent of First American Home.

On or about July 11, 2007, at the Assessor's Office for the Government of Prince

George's County, Maryland, TURNBULL filed a trade name application for First American Home, wherein TURNBULL listed herself as the owner of the business. A separate form titled, "Application for Identification Number," and signed by TURNBULL stated that the First American Home business was started in April 2007. On or about July 12, 2007, TURNBULL forwarded copies of the Trade Name Application and Application for Identification Number to SunTrust. SunTrust personnel observed that the Trade Name Application and Application for Identification Number were filed after SunTrust asked for supporting documentation from TURNBULL.

On or about September 17, 2007, TURNBULL hand delivered a letter written on Government of the District of Columbia letterhead to a SunTrust bank branch in Laurel, Maryland. The letter was addressed to First American Home and purported to confirm that First American Home participated in the District of Columbia Office of Tax and Revenue's annual real property tax sale and that TURNBULL was a registered representative of First American Home. At the end of the letter, the signature "[C.H.], Real [P]roperty Tax Sale manager" had been forged. TURNBULL caused this letter to be mailed in the U.S. mail to her home, in order to give the letter and envelope the veneer of legitimacy when it was presented to SunTrust bank.

After SunTrust Bank officials began making inquiry of fraudulent check no. 6756040, TURNBULL traveled to the Dominican Republic against the wishes of Harriette Walters. Harriette Walters was extremely concerned about the potential of the scheme being discovered by bank officials and, upon TURNBULL's return, reprimanded her for her unwillingness to accept responsibility for jeopardizing the scheme and for taking the necessary steps to address the problems at SunTrust Bank.

TURNBULL engaged in conversations with certain co-conspirators about the execution of the scheme and was aware of the involvement of other co-conspirators in the scheme, including Ricardo Walters, Richard Walters, and Connie Alexander.

TURNBULL filed federal tax returns for tax years 2005 and 2006, but not for 2007.³ TURNBULL owed substantially more federal income tax for calendar year 2007 than was reported to the IRS and declared due on her tax return. TURNBULL willfully failed to file a tax return for 2007, in that she failed to report the taxable income she gained from this fraudulent scheme. TURNBULL's additional tax due and owing, based on the total, actual income she received in tax year 2007, is between \$80,000 and \$200,000.

TURNBULL owed substantially more federal income tax for calendar years 2005 and 2006 (in addition to calendar year 2007) than was reported to the IRS and declared due on her

³ Turnbull was incarcerated at the time that her 2007 federal income tax returns were due.

tax returns. TURNBULL knowingly filed false tax returns for 2005 and 2006 in that she failed to report the taxable income she gained from this fraudulent scheme. TURNBULL's additional tax due and owing, based on the total, actual income she received in tax years 2005, 2006 and 2007, is the following: (1) \$134,653 for tax year 2005; (2) \$121,969 for tax year 2006; (3) \$151,459 for tax year 2007.

TURNBULL was arrested on November 7, 2007. After her arrest, TURNBULL was advised of her Miranda rights orally and in writing. TURNBULL waived those rights in writing and agreed to an interview. TURNBULL explained that she owned three businesses: (1) Legna Home Services, a home cleaning company; (2) Chappa Interiors, an interior design business; and (3) First American Home, a project management business. TURNBULL claimed that Legna Home Services earned approximately \$100,000 in 2006, but that Chappa Interiors was not profitable and First American Home had no clients.

TURNBULL also lied on several occasions during the interview. For example, TURNBULL stated that she was the only person to have access to her bank accounts, when she knew that Harriette Walters accessed the Turnbull accounts on several occasions to deposit fraudulent D.C. checks. TURNBULL said that she had deposited only two checks from the District of Columbia into her bank accounts, when in fact she had deposited or caused to be deposited into the Turnbull accounts several dozen fraudulent District of Columbia checks totaling over \$24 million. TURNBULL specifically denied receiving large sums of money from the District of Columbia, and denied receiving more than two checks from the District of Columbia.

Agents executed a search warrant at TURNBULL's home on November 7, 2007. Among the items recovered at TURNBULL's home were: (1) a Mercedes-Benz sport utility vehicle; (2) \$10,515 in U.S. currency; (3) diamond earrings; (4) a Chanel watch, purse, earrings, and handbags; (5) Cartier, Versace, Giorgio Armani, and Salvatore Ferragamo accessories; (6) many pieces of Louis Vuitton, Chanel, Judith Leiber, Gucci and Prada luggage and handbags; (7) a Versace dining set for eight persons; (8) Rolex watches; and (9) three plasma televisions.

The following is a list of real property and personal property that were purchased with the proceeds of the aforementioned scheme or were otherwise involved in, or traceable to such property involved in JAYRECE TURNBULL's involvement in a conspiracy to commit money laundering:

United States Currency:

At least \$410,000

Real Property:

The property located at 2206 Bermondsey Drive, Bowie, MD 20721

The property located at La Urb. Maria Josefa No. 1, Calle HCA, Santo Domingo,
Dominican Republic
The property located at Casa de Play en Palmar de Ocoa Road, Santo Domingo,
Dominican Republic

Personal Property:

All funds in the following bank accounts:

Bank of America Account No. 1913062655
Bank of America Account No. 1924497785
Bank of America Account No. 1925882467
Bank of America Account No. 2011518610
Bank of America Account No. 3913191333
Bank of America Account No. 3913191346
Bank of America Account No. 3913191359
Bank of America Certificate of Deposit No. 91000077388272
Bank of America Certificate of Deposit No. 91000056445327
Bank of America Certificate of Deposit No. 91000056445330
Bank of America Certificate of Deposit No. 91000056445356
Bank of America Certificate of Deposit No. 91000056445369
Bank of America Certificate of Deposit No. 91000056445385
Bank of America Certificate of Deposit No. 91000067749070
Bank of America Certificate of Deposit No. 91000067749096
Bank of America Certificate of Deposit No. 91000067749106
Bank of America Certificate of Deposit No. 91000067749135
Bank of America Certificate of Deposit No. 91000015728849
Bank of America Certificate of Deposit No. 91000015599492
SunTrust Bank Account No. 58028316
BB&T Bank Account No. 5154602544
BB&T Bank Account No. 5154602536
BanReservas Account No. 320-000318-1
BanReservas Account No. 320-006941-0
Banc of America Investment Services Account No. W13-105155
AIG SunAmerica Account No. P79A3517957

A 2005 Mercedes Benz ML350 automobile, VIN 4JGAB57EX5A533516
\$10,515 in U.S. Currency (CATS No. 08-FBI-000641)
Three plasma televisions (CATS No. 08-FBI-000638)
Miscellaneous jewelry (CATS No. 08-FBI-000639)
Designer handbags and shoes (CATS No. 08-FBI-000640)
Versace China (CATS No. 08-FBI-000642)
Fur hats (CATS No. 08-FBI-000643)

correct.

9/26/08
Date

Jayrece turnbull
Jayrece Turnbull
Jayrece turnbull