

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
AUG 29 2006
DAVID J. MALAND, CLERK
BY
DEPUTY _____

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

-vs-

TINA MARIE LAUER BENNETT, (01)
a.k.a. Billie Jo Goldsberry

REBEKAH K. DEAN (02)
a.k.a. Nicole A. Wilson

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Cause No. 4:06cr 68
Judge

INFORMATION

The United States Attorney Charges:

COUNT ONE

Violation: 18 U.S.C. § 371
(Conspiracy to commit Tax Evasion)

A. THE CONSPIRACY

1. During the tax year of 2004, in Denton County, Texas within the Eastern District of Texas and elsewhere, the defendant, TINA MARIE LAUER BENNETT, ("BENNETT"), and REBEKAH K. DEAN, ("DEAN") did knowingly and willfully combine, confederate, agree and conspire together, to commit certain offenses against the United States, namely:

a. to willfully attempt to evade and defeat a substantial amount of income tax due and owing by them to the United States for the calendar year 2004, by failing to file with the Director, Internal Revenue Service Center, a United States Income Tax Return, wherein

BENNETT and DEAN did not report \$684,541.71 in income, resulting in a tax loss of \$136,908.34, a violation of Title 26, United States Code, Section 7201.

B. THE MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that:

2. BENNETT and DEAN were employed in the adult entertainment business as exotic dancers and paid escorts. BENNETT and DEAN, either together or separately using their real names or alias', opened numerous bank accounts to deposit the proceeds of their employment. During the calendar year of 2004, BENNETT and DEAN deposited \$684,541.71 into these accounts with the intent to share the money between themselves. BENNETT and DEAN thereafter attempted to conceal this income and failed to file tax returns with the IRS. BENNETT and DEAN'S willful action of not reporting income resulted in a tax loss of \$136,908.34.

C. THE OVERT ACTS OF THE CONSPIRACY

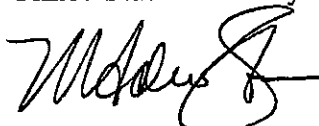
3. In furtherance of the conspiracy, and to effect its objects, BENNETT and DEAN did cause to be committed, in the calendar year of 2004, within the Eastern District of Texas and elsewhere the following overt acts:

- a. Deposits of \$478,267.50, into account number 0167-068139, with Wells Fargo Bank;
- b. Deposits of \$48,265.00, into account number 0363671, with Point Bank;
- c. Deposits of \$53,025.11, into account number 8439093808-65, with JP Morgan Chase;

- d. Deposits of \$11,120.00, into account number 634 295 729, with Bank One;
- e. Deposits of \$19,520.00, into account number 718-0711686-65, with Wells Fargo Bank;
- f. Deposits of \$1,600.00, into account number 0653-379008, with Wells Fargo Bank;
- g. Deposits of \$4,810.00, into account number 299324306, with Bank of America; and
- h. Deposits of \$67,934.10, in cash into account number 0169300, with Point Bank;

All in violation of Title 18, United States Code, Section 371.

MATTHEW D. ORWIG
United States Attorney



M. ANDREW STOVER
Assistant United States Attorney

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NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. § 371

Penalty: A fine not to exceed \$250,000.00 or imprisonment of not more than five (5) years, or both, and a term of supervised release of not more than three (3) years.

Special Assessment: \$100.00