

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF STETSON
WESTVIEW DIVISION

UNITED STATES,

v.

CASE NO. 1:21-cr-36

WANDA MAXIMOFF
a/k/a “Scarlet”

_____ /

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

1. The Department of Homeland Security, the United States Immigration and Customs Enforcement (“ICE”), and Homeland Security Investigations (“HIS”) are agencies of the executive branch of the government of the United States.

2. An Order of Supervision (“OSUP”), DHS Form I-220B, is a document issued by ICE to aliens who have been ordered removed from the United States, pursuant to a final order of removal, and who could not be removed due to qualifying conditions.

3. Aliens qualified for an OSUP, if for instance, they are: (1) nationals of countries that did not have diplomatic relations with the

United States; (2) single parents of children who were United States citizens; or (3) suffering from a significant health condition.

4. An OSUP authorizes the release of an alien to the community under prescribed reporting conditions. An OSUP affords certain benefits, including the ability to apply for and receive a Stetson Driver's License and an Employment Authorization Card, among other things.

5. Defendant **WANDA MAXIMOFF** is a national of the former Socialist Federal Republic of Yugoslavia and a naturalized United States citizen residing in Westview, Stetson.

COUNT ONE

Between May 31, 2007, and July 24, 2010, in the District of Stetson, the defendant,

WANDA MAXIMOFF
a/k/a "Scarlet"

did conspire to knowingly encourage and induce an alien (I.M., T.D., S.D., H.P., S.P., A.T., J.C., and R.B.) to reside in the United States, knowing and in reckless disregard of the fact that such residence is and will be in violation of law, namely by manufacturing and selling false and fraudulent OSUPs to the aliens illegally present in the United

States who did not qualify to receive an OSUP for the purpose of illegally obtaining a Stetson Driver's License and an Employment Authorization Card.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), (v).

A TRUE BILL

Karli Morgenthau

Foreperson

John Walker

John Walker
United States Attorney

Sharon Carter

Sharon Carter
First Assistant United States Attorney

Samuel Wilson

Samuel Wilson
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Dated: September 21, 2021