

UNITED STATES OF AMERICA : CRIMINAL NO. _____

THOMAS CITRO : VIOLATIONS: 18 U.S.C. §1512(b)(1)
(Obstruction of Justice - 1 count)
26 U.S.C. §7201
(Attempt to Evade or Defeat
Tax - 2 counts)

COUNT ONE

3. From in or about December 9, 1998 to in or about February 22, 1999, at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

corruptly persuaded and attempted to corruptly persuade J.C. with the intent to influence the testimony of J.C. in an official proceeding, that is, a federal grand jury sitting in the Eastern District of Pennsylvania, investigating the attempt to evade or defeat tax, by attempting to have

J.C. provide a fake document and false testimony to the grand jury relating to defendant **CITRO'S** rental of a property at the New Jersey shore.

In violation of Title 18, United States Code, Section 1512(b)(1).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. During calendar year 1996, defendant **THOMAS CITRO** received substantial taxable income from his work as an expediter for clients with matters pending before the Philadelphia Department of Licenses and Inspection or the Philadelphia Zoning Board of Adjustment.

2. On or about April 15, 1997, in the Eastern District of Pennsylvania and elsewhere, defendant,

THOMAS CITRO,

whose principal business was in Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for calendar year 1996 by failing to make and file an income tax return on or before April 15, 1997, as required by law, to any proper officer of the Internal Revenue Service; by failing to pay to the Internal Revenue Service this income tax; by failing to keep books and records; by dealing extensively in cash; and, by encouraging certain clients of his expediting business to conceal the nature and extent of their business dealings with defendant **CITRO** from an Internal Revenue agent and the federal grand jury.

In violation of Title 26, United States Code, Section 7201.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. During calendar year 1997, defendant **THOMAS CITRO** received substantial taxable income from his work as an expediter for clients with matters pending before the Philadelphia Department of Licenses and Inspection or the Philadelphia Zoning Board of Adjustment.

2. On or about April 15, 1998, in the Eastern District of Pennsylvania and elsewhere, defendant,

THOMAS CITRO,

whose principal business was in Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for calendar year 1997 by failing to make and file an income tax return on or before April 15, 1998, as required by law, to any proper officer of the Internal Revenue Service; by failing to pay to the Internal Revenue Service this income tax; by failing to keep books and records; by dealing extensively in cash; and, by encouraging certain clients of his expediting business to conceal the nature and extent of their business dealings with defendant **CITRO** from an Internal Revenue agent and the federal grand jury.

In violation of Title 26, United States Code, Section 7201.

PATRICK L. MEEHAN
United States Attorney

