

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 11- _____
 :
 JERRY JULIAN : 26 U.S.C. § 7206(2)
 :

INFORMATION

The Defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information, defendant JERRY JULIAN was a prisoner in the custody of the State of New Jersey and an inmate in Riverfront State Prison in Camden, New Jersey.

2. For the tax years 2003 through 2005, defendant JERRY JULIAN :

a. met with fellow inmates and prisoners (the "Inmates") at Riverfront State Prison in order to prepare and/or to assist in the preparation of the Inmates' U.S. individual income tax returns (Forms 1040EZ) in exchange for a fee;

b. told the Inmates that the Federal Government paid the prison minimum wage for the labor of the Inmates, that employment taxes were withheld from those amounts, and that the Inmates were entitled to claim a refund on their income tax return of the amounts withheld, when in fact the Inmates made no more than \$5 per day from which no taxes were withheld;

c. prepared or assisted in the preparation of more than 110 false U.S. individual income tax returns for more than 60 Inmates by fabricating and falsifying both the Inmates' wages and salaries and their employment taxes withholdings in order to obtain refunds

greater than that to which the Inmates were entitled; and

d. filed or assisted in the filing with the Internal Revenue Service the false U.S. individual income tax returns for the Inmates.

3. On or about November 24, 2006, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

JERRY JULIAN,

did knowingly and willfully aid, assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of a 2005 U.S. Individual Income Tax Return, Form 1040EZ for a taxpayer identified herein as "A.B.," which return was false and fraudulent as to material matters, in that the return contained false and fraudulent wage and salary information and withholding information for "A.B." that the defendant well knew and believed were fraudulent and wholly fictitious in order to generate a refund for "A.B." of more than \$2,100 that "A.B." was not entitled to receive.

In violation of Title 26, United States Code, Section 7206(2).



PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: 200800549

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v.

JERRY JULIAN

INFORMATION FOR

Title 26 United States Code
Section 7206(2)

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