



3. On or about January 24, 2002, in the Eastern District of Pennsylvania,  
defendant

**KENNETH EVANS**

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2000, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant EVANS did not believe to be true and correct as to every material matter, in that the return reported "0" income, when, as defendant EVANS well knew, he had received income of approximately \$55,722 from his employment with Aventis.

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about March 28, 2002, in the Eastern District of Pennsylvania,

defendant

**KENNETH EVANS**

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2001, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant EVANS did not believe to be true and correct as to every material matter, in that the return reported "0" income, when, as defendant EVANS well knew, he had received approximately \$77,738 from his employment with Aventis.

In violation of Title 26, United States Code, Section 7206(1).

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**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about April 15, 2003, in the Eastern District of Pennsylvania,

defendant,

**KENNETH EVANS**

a resident of Kennett Square, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2002 by failing to make an income tax return on or about April 15, 2003 as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things, filing a false IRS Form W-4 with his employer which stated that he was exempt from taxation for the purpose of causing his employer to fail to withhold federal income taxes from his wages.

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

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**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about April 15, 2004, in the Eastern District of Pennsylvania,

defendant

**KENNETH EVANS**

a resident of Kennett Square, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2003 by failing to make an income tax return on or about April 15, 2005 as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things, filing a false IRS Form W-4 with his employer which stated that he was exempt from taxation for the purpose of causing his employer to fail to withhold federal income taxes from his wages.

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about April 15, 2005, in the Eastern District of Pennsylvania,

defendant

**KENNETH EVANS**

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2004, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant EVANS did not believe to be true and correct as to every material matter, in that the return reported "0" income, when, as defendant EVANS well knew, he had received approximately \$84,819 from his employment with Aventis.

In violation of Title 26, United States Code, Section 7206(1).

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**

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