

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.:** 11-_____

v. : **DATE FILED:** September 30, 2011

MOHAMAD KOUBAISSI : **VIOLATIONS:**
: **26 U.S.C. § 7203 (failure to file a federal**
: **income tax return - 5 counts)**

I N F O R M A T I O N

COUNTS ONE THROUGH FIVE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. During 2004 through 2008, defendant MOHAMAD KOUBAISSI received gross income from his employment with Bare Feet Shoes in excess of the amounts which required him to file income tax returns: \$7,950 during 2004; \$8,200 during 2005; \$8,450 during 2006; \$8,750 during 2007; and \$8,950 during 2008.

2. During calendar years 2004 through 2008, as set forth below, in the Eastern District of Pennsylvania, defendant

MOHAMAD KOUBAISSI,

a resident of Philadelphia, Pennsylvania, had and received gross income substantially in excess of the minimum filing requirement, as set forth above, and that by reason of such gross income was required by law, following the close of each calendar year and on or before April 15 of the following year, to make an income tax return to the Director, Internal Revenue Service Center, at Philadelphia, Pennsylvania, or other proper officer of the United States, stating specifically the items of his gross income and any deductions and credits to which he was entitled; that knowing

this, he willfully failed to make an income tax return to the Director of the Internal Revenue Service Center, or to any other proper officer of the United States:

<u>COUNT</u>	<u>YEAR</u>	<u>APPROXIMATE GROSS INCOME</u>
One	2004	\$14,400
Two	2005	\$32,517
Three	2006	\$42,666
Four	2007	\$52,556
Five	2008	\$54,091

All in violation of Title 26, United States Code, Section 7203.

ZANE DAVID MEMEGER
United States Attorney