UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	**Criminal No.** 08-147
	:	Mag. No. 08-203-M-1
v.	:	**VIOLATIONS:**
	:	
TIJANI AHMED SAANI,	:	**26 U.S.C. § 7206(1)**
Defendant	:	**(Filing a False Income Tax Return)**
	:	

MAY 16 2008

LEON, J. RJL

INDICTMENT

THE GRAND JURY CHARGES:

A

Introduction

At all times material to the Indictment:

1. TIJANI A. SAANI, a Department of the Air Force civilian employee, worked as a contracting officer on detail to Camp Arifjan, Kuwait between 2002 and 2007. During this time SAANI was responsible for awarding and administering contracts for goods and services on behalf of the United States in support of Operation Iraqi Freedom and on behalf of the United States Embassy in Kuwait. SAANI's, along with his wife BARBARA SAANI's, and two adopted minor children's, last known residence was in Kuwait.

2. On April 21, 2006, SAANI and BARBARA SAANI signed and caused to be signed, under the penalty of perjury, a U.S. Individual Income Tax Return for the 2005 tax year. Schedule B of their 2005 tax return included in Part III, 7a the question: "At any time during 2005, did you have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account, or other financial account?" SAANI

and BARBARA SAANI checked "No" in response to this question. They left blank Part III, 7b, which asked for the name of the foreign country in which the account existed if the question in Part III, 7a had been answered affirmatively.

3. Bank records produced by HSBC Bank plc and HSBC Bank International Limited show that on January 26, 2003, SAANI completed an Offshore Account Application Form for HSBC in Jersey, a self-governing British Crown dependency located in the English Channel. On his application, SAANI listed his home address as the American Embassy in Kuwait. He also provided to HSBC a copy of his United States Passport to confirm his identity.

4. In April 2003, HSBC accepted SAANI's application and established two accounts for him in Jersey. SAANI later opened three additional accounts at HSBC in Jersey. Bank and wire transfer records revealed that between March 2003 and July 2007, when HSBC closed these accounts, SAANI made and caused to be made frequent deposits, withdrawals, and other transfers. In total, between 2003 and 2007, TIJANI SAANI and BARBARA SAANI wired at least $700,000 to SAANI's HSBC accounts in Jersey.

COUNT ONE
Filing a False Income Tax Return
26 U.S.C. § 7206(1)

5. Paragraphs 1-4 are hereby re-alleged and incorporated by reference as though set forth in full in Count One.

6. On or about April 21, 2006, TIJANI SAANI, a United States citizen and resident of Kuwait, did knowingly and willfully make and subscribe, and cause to be made and subscribed, a joint U.S. Individual Income Tax Return for the calendar year 2005, which was verified by a written declaration that it was made under the penalties of perjury and was filed

with the Internal Revenue Service, which said income tax return he did not believe to be true and correct as to every material matter in that the said income tax return reported "No" on Schedule B, Part III, line 7a in response to the question, "At any time during 2005, did you have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account, or other financial account?", whereas, as defendant TIJANI SAANI then and there well knew and believed, he had an interest in and signature and other authority over a financial account at HSBC in Jersey, Channel Islands.

All in violation of Title 26, United States Code, Section 7206(1), and pursuant to the extraterritorial venue provisions in Title 18, United States Code, Section 3238.

A True Bill.

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Foreperson

DATED: May ___, 2008, at Washington, D.C.

FOR THE UNITED STATES

By: _____

Lisa Phelan, Chief
National Criminal Enforcement Section
Antitrust Division

By: _____

Mark Fletcher, Trial Attorney
Emily Allen, Trial Attorney
Ryan Danks, Trial Attorney

National Criminal Enforcement Section
United States Department of Justice
Antitrust Division
450 5th Street NW, 11th Floor
Washington, DC 20001

FOR THE UNITED STATES

By: _____

William M. Welch II, Chief
Public Integrity Section
Criminal Division

By: _____

Ann C. Brickley, Trial Attorney
Kathryn H. Abrecht, Trial Attorney
Richard B. Evans, Trial Attorney

Public Integrity Section
United States Department of Justice
Criminal Division
1400 New York Ave., NW
Washington, DC 20005