UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	Criminal No.: 16Cr 384 (VB)
v.	:	Filed:
JOHN SIMONLACAJ,	:	Violation: 26 U.S.C. § 7206(2)
Defendant.	:	

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INFORMATION

The United States of America, acting through its attorneys, charges:

1. JOHN SIMONLACAJ ("SIMONLACAJ") is hereby made a Defendant on the charge stated below.

AIDING AND ASSISTING IN THE PREPARATION AND PRESENTATION OF A FALSE AND FRAUDULENT TAX RETURN
(26 U.S.C. § 7206(2))

During the period covered by this Count:

2. SIMONLACAJ resided in Westchester County, New York.

3. INDIVIDUAL-1, a relative of SIMONLACAJ, resided in the Bronx, New York. INDIVIDUAL-1 did business as COMPANY-1. COMPANY-1's income and expenses were reported on a Schedule C that was filed with INDIVIDUAL-1's 2010 U.S. Individual Income Tax Return, Form 1040.

4. SIMONLACAJ exercised control over COMPANY-1 in 2010. SIMONLACAJ engaged an accountant to prepare INDIVIDUAL-1's 2010 U.S. Individual Income Tax Return, Form 1040, including a Schedule C, which is used by a

taxpayer to report the gross receipts, expenses, and profit or loss from a business operated by the taxpayer. SIMONLACAJ was the individual who caused to be provided to the accountant the information required by the accountant to complete INDIVIDUAL-1's 2010 U.S. Individual Income Tax Return, Form 1040. Subsequently, INDIVIDUAL-1's tax return was electronically filed by the accountant.

DESCRIPTION OF THE OFFENSE

5. On or about the date set forth below, within the Southern District of New York and elsewhere, SIMONLACAJ, the defendant, willfully and knowingly did aid and assist in, and procure, counsel and advise the preparation and presentation under, and in connection with matters arising under, the internal revenue laws of the United States, of a return, affidavit, claim, and other documents, to wit, a U.S. Individual Income Tax Return Form 1040, and accompanying forms and schedules, for the taxpayer listed below, and for the tax year listed below, which return was false and fraudulent as to material matters, in that, among other things, the return fabricated and/or falsely overstated items on Schedule C such as cost of goods sold, contract labor, wages to employees and supply expenses, as set forth below:

Taxpayer	**Tax Year**	**Approx Filing Date of Return**	**Nature of Fabricated and/or Inflated Item(s)**	**Approximate Amount of Fabricated and/or Inflated Item(s)**

Individual-1	2010	04/14/2011	Cost of Goods Sold Contract Labor Supply Expenses Wages to Employees	$301,558 $ 60,170 $ 10,000 $ 31,849

IN VIOLATION OF TITLE 26, UNITED STATES CODE, SECTION 7206(2).

Dated: June 3, 2016

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