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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

APR 06 2023

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CLERK U.S. DISTRICT COURT - DNJ

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|--------------------------|---|------------------------------|
| UNITED STATES OF AMERICA | : | Crim. No. <u>23-280 (GC)</u> |
|                          | : |                              |
| v.                       | : | 26 U.S.C. § 7201             |
|                          | : |                              |
| RAYMOND J. SALANI, JR.   | : | <u>INDICTMENT</u>            |
|                          | : |                              |

The Grand Jury in and for the District of New Jersey, sitting at  
Trenton, charges:

**COUNT ONE**  
**(Tax Evasion)**

1. At all times relevant to this Indictment, unless otherwise indicated:
  - a. The Internal Revenue Service ("IRS") was an agency of the United States within the Department of Treasury, responsible for administering and enforcing the tax laws of the United States.
  - b. The tax laws of the United States required every citizen and resident of the United States who received income in excess of the minimum filing amount established by law for a particular tax year to make and file annually a U.S. Individual Income Tax Return ("Form 1040"), in which a taxpayer reported items including income, deductions, and tax due and owing. Generally, individuals were required by law to prepare and file a Form 1040 with the IRS, and pay any tax liability, by on or about April 15 of each year for the preceding calendar year unless the taxpayer obtained an extension to file the return.
  - c. As a citizen and resident of the United States who received income in excess of the minimum filing amount established by law for tax years

2016 and 2017, Defendant RAYMOND J. SALANI, JR. ("SALANI") was required to make and file annually a Form 1040. SALANI was responsible for accurately reporting on the Form 1040, among other items, his total income from whatever sources derived.

d. SALANI resided in Morganville, New Jersey, and was the owner and president of Medical Nutrition, Inc. ("Medical Nutrition"), located in West Long Branch, New Jersey, which purportedly provided management services to Lifestyles Medical, LLC ("Lifestyles Medical"), a medical practice also controlled by SALANI and located in the same office as Medical Nutrition.

e. SALANI was not a licensed physician and, therefore, was prohibited under New Jersey law from owning or controlling a medical practice and employing licensed physicians. To conceal his ownership and control of Lifestyles Medical, SALANI employed a licensed physician ("Doctor-1") to work at Lifestyles Medical on a part-time basis and act as nominee owner of Lifestyles Medical. However, Doctor-1 did not have access to or control over the business records and financial accounts of Lifestyles Medical. At all relevant times, SALANI acted as the true owner of Lifestyles Medical, managed the day-to-day operations of Lifestyles Medical, and exercised control over the business bank accounts of both Lifestyles Medical and Medical Nutrition.

2. From in or about January 2016 through in or about May 2017, SALANI attempted to conceal his income from the IRS and evade the assessment of federal income taxes by transferring income earned by Lifestyles Medical from the business bank account for Lifestyles Medical into the

business bank account for Medical Nutrition, purportedly as payments to Medical Nutrition for management services rendered to Lifestyles Medical, which SALANI used primarily to pay for personal expenses.

3. From in or about January 2016 through in or about December 2017, SALANI attempted to conceal his income from the IRS and evade the assessment of federal income taxes by using the business bank account of Medical Nutrition to pay for personal expenses, including, but not limited to, the following:

- a. Over \$80,000 for mortgage and related expenses on real estate property that SALANI owned or in which he had a financial interest;
- b. Over \$160,000 in payments to pay down balances on a personal credit card account in the name of SALANI's spouse; and
- c. Over \$10,000 in payments for a personal vehicle leased by SALANI.

4. For the tax year 2016, SALANI had and received taxable income through Medical Nutrition in the sum of approximately \$137,254. Upon that taxable income, an income tax of approximately \$52,080 was owed to the United States of America. Well knowing of the foregoing facts, SALANI purposely failed to file a Form 1040 for the tax year 2016, as required by law, and purposely failed to report as income the funds from the business bank account for Medical Nutrition that he used to pay for personal expenses.

5. On or about April 15, 2017, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

RAYMOND J. SALANI, JR.,

did willfully attempt to evade and defeat a substantial income tax due and owing by him to the United States of America, for the tax year 2016, by committing the affirmative acts set forth in paragraphs 1 through 4 above, among others.

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

**COUNT TWO**  
**(Tax Evasion)**

1. The allegations contained in paragraphs 1 through 3 of Count One of this Indictment are re-alleged and incorporated as if set forth in full herein.

2. For tax year 2017, SALANI utilized the tax preparation services of Tax Preparer-1.

3. Tax Preparer-1 prepared SALANI's Form 1040 for tax year 2017 using information supplied by SALANI.

4. For the tax year 2017, SALANI had and received taxable income through Medical Nutrition in the sum of approximately \$95,485. Upon that taxable income, there was owing to the United States of America an income tax of approximately \$35,555. Well knowing of the foregoing facts, SALANI did not inform Tax Preparer-1 of the taxable income SALANI had and received through Medical Nutrition for the tax year 2017.

5. SALANI willfully caused the preparation of a materially false Form 1040, for himself and his spouse, which did not disclose the existence of the taxable income SALANI had and received through Medical Nutrition for the tax year 2017.

6. SALANI signed his Form 1040 for tax year 2017, which had been prepared by Tax Preparer-1 using information supplied by SALANI, declaring under penalty of perjury that his tax return was true, correct, and complete.

7. On or about February 25, 2021, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

RAYMOND J. SALANI, JR.,

who during the tax year 2017 was married, did willfully attempt to evade and defeat a substantial part of the income tax due and owing by him and his spouse to the United States of America for the tax year 2017, by preparing and causing to be prepared, signing and causing to be signed, and mailing and causing to be mailed a false and fraudulent joint United States Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service, knowing it to be false and fraudulent with respect to the amount of reported income on which the tax was due and owing.

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

A TRUE BILL



FOREPERSON

*Philip R. Sellinger*

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PHILIP R. SELLINGER  
United States Attorney

CASE NUMBER: 23-280 (GC)

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

RAYMOND J. SALANI, JR.

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INDICTMENT FOR

26 U.S.C. § 7201

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PHILIP R. SELLINGER  
UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY

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IAN D. BRATER  
ASSISTANT UNITED STATES ATTORNEY  
TRENTON, NEW JERSEY

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