IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLIN

UNITED STATES OF AMERICA	:	SUPERSEDING
	:	
v.	:	1:15CR379-1
	:	
PAUL DOUGLAS THARP,	:	
also known as Doug Tharp		

The Grand Jury charges:

COUNT ONE

On or about November 10, 2010, in the County of Davidson, in the Middle District of North Carolina, in a matter within the jurisdiction of the Department of Transportation, a component of the executive branch of the United States government, PAUL DOUGLAS THARP, also known as Doug Tharp, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, in that on aircraft maintenance records of aircraft N2354H, an ERCO Model 415-C, Serial Number 2979, PAUL DOUGLAS THARP, also known as Doug Tharp, did forge the signature in the name of J.H., the holder of a mechanic certificate with airframe and power plant ratings and inspection authorization, when in fact PAUL DOUGLAS THARP, also known as Doug Tharp, knew that J.H. had not performed any maintenance or repairs on that aircraft on or about November 10, 2010, and that he himself had performed the maintenance and repairs on that

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aircraft; in violation of Title 18, United States Code, Section 1001.

COUNT TWO

On or about November 10, 2010, in the County of Davidson, in the Middle District of North Carolina, PAUL DOUGLAS THARP, also known as Doug Tharp, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit: making a false statement and false entry in a matter within the jurisdiction of the Department of Transportation, in violation of Title 18, United States Code, Section 1001, as alleged in Count One and incorporated by reference herein, knowing that the means of identification belonged to a person with the initials J.H.; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE

From on or about August 1, 2012, continuing up to and including on or about August 2, 2012, the exact dates to the Grand Jurors unknown, in the County of Davidson, in the Middle District of North Carolina, and elsewhere, PAUL DOUGLAS THARP, also known as Doug Tharp, knowingly and willfully served as an airman without an airman's certificate authorizing him to serve in that capacity; in violation of Title 49, United States Code, Section 46306(b)(7).

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COUNT FOUR

From on or about September 1, 2012, continuing up to and including on or about September 3, 2012, the exact dates to the Grand Jurors unknown, in the County of Davidson, in the Middle District of North Carolina, and elsewhere, PAUL DOUGLAS THARP, also known as Doug Tharp, knowingly and willfully served as an airman without an airman's certificate authorizing him to serve in that capacity; in violation of Title 49, United States Code, Section 46306(b)(7).

COUNT FIVE

On or about August 5, 2012, in the County of Davidson, in the Middle District of North Carolina, and elsewhere, PAUL DOUGLAS THARP, also known as Doug Tharp, knowingly and willfully served as an airman without an airman's certificate authorizing him to serve in that capacity; in violation of Title 49, United States Code, Section 46306(b)(7).

COUNT SIX

On or about November 25, 2012, in the County of Davidson, in the Middle District of North Carolina, and elsewhere, PAUL DOUGLAS THARP, also known as Doug Tharp, knowingly and willfully served as an airman without an airman's certificate authorizing him to serve in that capacity; in violation of Title 49, United States Code, Section 46306(b)(7).

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COUNT SEVEN

From in or about October, 2011, continuing up to and including in or about October, 2014, the exact dates to the Grand Jurors unknown, in the County of Davidson, in the Middle District of North Carolina, and elsewhere, PAUL DOUGLAS THARP, also known as Doug Tharp, willfully attempted to evade and defeat the payment of income tax due and owing by him to the United States of America for the calendar years 2004 through 2007 by committing the following affirmative acts, among others:

(a) Filing and causing to be filed a false Collection
Information Statement for Wage Earners and Self-Employed
Individuals, IRS Form 433-A;

(b) Filing and causing to be filed a false U.S. Individual Income Tax Return, IRS Form 1040, for calendar year 2010;

(c) Filing and causing to be filed a false joint U.S.Individual Income Tax Return, IRS Form 1040, for calendar year2011;

(d) Filing and causing to be filed a false joint U.S. Individual Income Tax Return, IRS Form 1040, for calendar year 2012; and

(e) Filing and causing to be filed a false joint U.S. Individual Income Tax Return, IRS Form 1040, for calendar year 2013.

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All in violation of Title 26, United States Code, Section 7201.

COUNT EIGHT

On or about August 8, 2012, in the County of Davidson, in the Middle District of North Carolina, PAUL DOUGLAS THARP, also known as Doug Tharp, a resident of Thomasville, North Carolina, did willfully make and subscribe a false joint U.S. Individual Income Tax Return, IRS Form 1040, for the calendar year 2011, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter, in that he failed to disclose that he was engaged in the operation of a business activity from which he derived gross receipts or sales and received income; in violation of Title 26, United States Code, Section 7206(1).

COUNT NINE

On or about October 15, 2014, in the County of Davidson, in the Middle District of North Carolina, PAUL DOUGLAS THARP, also known as Doug Tharp, a resident of Thomasville, North Carolina, did willfully make and subscribe a false joint U.S. Individual Income Tax Return, IRS Form 1040, for the calendar year 2012, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter, in that he

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failed to disclose that he was engaged in the operation of a business activity from which he derived gross receipts or sales and received income; in violation of Title 26, United States Code, Section 7206(1).

COUNT TEN

On or about October 15, 2014, in the County of Davidson, in the Middle District of North Carolina, PAUL DOUGLAS THARP, also known as Doug Tharp, a resident of Thomasville, North Carolina, did willfully make and subscribe a false joint U.S. Individual Income Tax Return, IRS Form 1040, for the calendar year 2013, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter, in that he failed to disclose that he was engaged in the operation of a business activity from which he derived gross receipts or sales

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and received income; in violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL:

FOREPERSON

ANAND P. RAMASWAMY ASSISTANT UNITED STATES ATTORNEY

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NATHAN P. BROOKS TRIAL ATTORNEY

PLEY RAN

UNITED STATES ATTORNEY