

**DUPLICATE ORIGINAL**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Leda Dunn Wettre
	:	
v.	:	Mag. No. 20-13345
	:	
STEVEN BRYCE	:	<b><u>CRIMINAL COMPLAINT</u></b>

I, Paul J. Donahue, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Internal Revenue Service – Criminal Investigation, and that this Complaint, which is submitted, pursuant to 26 U.S.C. § 6531, to extend the six-year statute of limitations period applicable to the offense herein alleged under 26 U.S.C. §§ 7206(1), is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part of this Complaint.



Paul J. Donahue  
Special Agent, Internal Revenue  
Service – Criminal Investigation

Sworn to before me,  
and subscribed in my presence  
on the 6th day of July, 2020  
at Newark, New Jersey

THE HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

*Leda Dunn Wettre*  
Signature of Judicial Officer

\*\*\* Special Agent Paul J. Donahue, Internal Revenue Service – Criminal Investigation attested to the contents of the written affidavit submitted as Attachment B to this Criminal Complaint by telephone pursuant to Rule 4.1(b)(2)(A) of the Federal Rules of Criminal Procedure.

**ATTACHMENT A**

**(Subscribing to a False Tax Return)**

On or about July 14, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

STEVEN BRYCE

willfully did make and subscribe a U.S. Individual Income Tax Return, Form 1040, for the calendar year 2013, which contained and 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 material matters.

In violation of Title 26, United States Code, Section 7206(1).

**ATTACHMENT B**

I, Paul J. Donahue, am a Special Agent with Internal Revenue Service – Criminal Investigation. I am fully familiar with the following facts based on my conversations with law enforcement agents who have participated in the investigation and my review of documents and other items of evidence. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause. All conversations and statements described in this affidavit are related in substance and in part, unless otherwise indicated.

1. During the time period relevant to the Complaint:
  - a. Defendant STEVEN BRYCE (“defendant BRYCE”) was a resident of Monmouth County, New Jersey. Defendant BRYCE owned Reno Real Estate & Investments Limited Liability Company.
  - b. The Internal Revenue Service (“IRS”), an agency within the United States Department of Treasury, was responsible for administering and enforcing the tax laws of the United States, including the federal income tax laws.
2. According to records obtained during the investigation, which I have reviewed, and my discussions with agents who have participated in this investigation, during calendar year 2013, defendant BRYCE operated a gambling business from which he received tens of thousands of dollars in that year.
3. I have reviewed defendant BRYCE’s IRS U.S. Individual Income Tax Return, Form 1040, for the calendar year 2013, which he electronically signed on or about July 8, 2014 and which he electronically filed and caused to be filed with the IRS on his and his spouse’s behalf on or about July 14, 2014 (the “2013 Tax Return”). Based on information obtained during the investigation, defendant BRYCE caused an accountant to file the 2013 Tax Return electronically from the accountant’s office in Union, New Jersey. The 2013 Tax Return stated that defendant BRYCE and his spouse had total income in the approximate amount of \$112,899.
4. Based on my review of records obtained during the investigation and my discussions with agents who have participated in this investigation, I have learned that the 2013 Tax Return was not true and correct as to every material matter, as defendant BRYCE well knew, in that: (a) in calendar year 2013, defendant BRYCE received tens of thousands of dollars from a gambling business that he operated, and (b) as a result of his gambling business, defendant BRYCE had income substantially in excess of the amount reported on the 2013 Tax Return, which contained a written declaration that it was filed under penalties of perjury.