

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term  
Grand Jury Sworn in on July 6, 2017**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
	:	<b>CRIMINAL NO.</b>
<b>v.</b>	:	
	:	
<b>ISSAC LANIER AVANT</b>	:	<b>VIOLATION:</b>
	:	
<b>Defendant.</b>	:	<b>18 U.S.C. § 1001(a)(2) (False Statements)</b>
	:	<b>18 U.S.C. § 2 (Aiding and Abetting)</b>
	:	
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**INDICTMENT**

The Grand Jury charges that:

**INTRODUCTION**

At all relevant times, unless otherwise indicated:

1. Defendant **ISSAC LANIER AVANT** was a staff member employed by the U.S. House of Representatives since approximately 2000. Since approximately 2002, AVANT has been the Chief of Staff for a Member of Congress. In approximately December 2006, he began an additional position for the House Committee on Homeland Security, including Deputy Staff Director and Staff Director. During this time, Defendant **ISSAC LANIER AVANT** resided in Arlington, Virginia.

2. In May, 2005, **ISSAC LANIER AVANT** caused an Internal Revenue Service (“IRS”)

Form W-4, Employee's Withholding Allowance Certificate, to be filed with his employer that claimed he was exempt from federal income taxes. Upon receipt of the Form W-4, the U.S. House of Representatives stopped withholding federal income tax from Defendant **ISSAC LANIER AVANT**'s monthly paycheck. Defendant **ISSAC LANIER AVANT** did not have any federal tax withheld from his paycheck from May, 2005 until the IRS mandated that his employer begin withholding federal tax from Defendant **ISSAC LANIER AVANT** in January, 2013.

3. For calendar years 2008 through 2012, Defendant **ISSAC LANIER AVANT** earned wages of approximately \$170,000 per year. For each of these years, Defendant **ISSAC LANIER AVANT** failed to timely file an income tax return with the IRS.

4. In or around April, 2013, the IRS started to garnish Defendant **ISSAC LANIER AVANT**'s pay for approximately \$1,500 per month to repay his tax debt for tax year 2008.

5. Standard Form 86 ("SF-86"), entitled "Questionnaire for National Security Positions," is a form used by the federal government in conducting background investigations for job applicants and employees requiring a security clearance.

6. In 2008 and again in 2013, for his position with the Committee on Homeland Security, Defendant **ISSAC LANIER AVANT** completed a SF-86 in order to receive a Top Secret security clearance.

**COUNT ONE**  
**(False Statements)**

7. Paragraphs 1 through 6 of this Indictment are re-alleged and incorporated as if fully set forth herein.

8. On or about September 18, 2013, in the District of Columbia, in a matter within the

jurisdiction of the executive branch of the Government of the United States, defendant **ISSAC LANIER AVANT** did willfully and knowingly make and cause to be made a materially false, fictitious, and fraudulent statement and representation, by responding “no” to the following question on a Questionnaire for National Security Positions, Form SF-86: “In the past seven (7) years have you failed to file or pay Federal, state, or other taxes when required by law or ordinance?” The statement and representation were false because, as defendant **ISSAC LANIER AVANT** then and there knew, he had failed to file and pay his federal taxes within the previous seven year period.

**(All in violation of 18 U.S.C. §§ 1001(a)(2) and 2)**

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
DATE

  
\_\_\_\_\_