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U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR
MAKING FRAUDULENT STATEMENTS ON A TAX
RETURN AND WILLFUL FAILURE TO FILE TAX RETURNS**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

13-181

v.

*

SECTION:

SECT. H MAG. 4

GIROD JACKSON

*

**VIOLATION: 26 U.S.C. §7206(1)
26 U.S.C. §7203**

* * *

The United States Attorney charges that:

COUNT 1
FRAUDULENT STATEMENT ON A FEDERAL TAX RETURN

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **GIROD JACKSON**, was a resident of Marrero, Louisiana, a location within the Eastern District of Louisiana.
2. The defendant, **GIROD JACKSON**, was the sole owner and operator of Diversified Ventures, LLC, a construction and project management company located in Marrero, Louisiana.
3. In and around 2006, Diversified Ventures received gross receipts in excess of

approximately \$600,000 as a result of contracts the company had with several private and public entities to perform a variety of construction and construction-related services.

4. In and around 2007, the defendant, **GIROD JACKSON**, filed a joint federal tax return with his wife. The tax return for 2006 income included only a portion of the actual gross receipts for Diversified Ventures in its Schedule C.

B. THE OFFENSE

On or about August 27, 2007, in the Eastern District of Louisiana, the defendant, **GIROD JACKSON**, a resident of Marrero, Louisiana, did willfully make and subscribe a federal tax return, which was filed jointly with his wife, and which was verified by a written declaration that it was made under the penalties of perjury and which the defendant, **GIROD JACKSON**, did not believe to be true and correct as to every material matter, in that the federal tax return stated that the defendant's company, Diversified Ventures, received gross receipts totaling approximately \$108,000 and that the defendant, **GIROD JACKSON**, was due a tax refund of approximately \$185, whereas, as he then and there knew, the actual gross receipts received by Diversified Ventures in the calendar year exceeded approximately \$600,000 and that as a result, the defendant, **GIROD JACKSON**, had tax due and owing of approximately \$79,486.

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

COUNT 2
FAILURE TO FILE FEDERAL TAX RETURN

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations as set forth in Section A, Count 1, above are re-alleged and incorporated herein.

2. In and around 2007, Diversified Ventures received gross receipts in excess of approximately \$436,000 as a result of contracts the company had with several private and public entities to perform a variety of construction and construction-related services.

3. On or before April 15, 2008, the defendant, **GIROD JACKSON**, requested and received a filing extension for his 2007 federal tax return. After receiving this extension, the defendant was obligated to file his federal tax return on or before October 15, 2008.

4. After being contacted by the Internal Revenue Service, in and around November 2011, the defendant, **GIROD JACKSON**, filed a federal tax return for the 2007 year in which he attested under penalty of perjury that the gross receipts for Diversified Ventures was approximately \$113,000.

B. THE OFFENSE

During the calendar year 2007, the defendant, **GIROD JACKSON**, who was a resident of Marrero, Louisiana, had and received gross income of approximately \$116,605. By reason of such gross income, he was required by law, following the close of the calendar year 2007 and on or before October 15, 2008 to make an income tax return to the Internal Revenue Service Center, at New Orleans, Louisiana, to a person assigned to receive returns at the local office of the Internal Revenue Service at New Orleans, Louisiana, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing all of the foregoing, he did willfully fail, on or about October 15, 2008, in the Eastern District of Louisiana and elsewhere, to make an income tax return.

In violation of Title 26, United States Code, Section 7203.

COUNT 3
FAILURE TO FILE FEDERAL TAX RETURN

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations as set forth in Sections A, Counts 1 and 2, above are re-alleged and incorporated herein.
2. In and around 2008, Diversified Ventures received gross receipts in excess of approximately \$423,000 as a result of contracts the company had with several private and public entities to perform a variety of construction and construction-related services.
3. In and around the fall of 2007, the defendant, **GIROD JACKSON**, ran unopposed for and was elected to the position of State Representative for the 87th Louisiana Congressional District. As a result of his employment in and around 2008 as the elected Louisiana State Representative for District 87, in and around 2009, the State of Louisiana issued the defendant, **GIROD JACKSON**, a Form W-2 with wages of approximately \$37,806.
4. On or before April 15, 2009, the defendant, **GIROD JACKSON**, requested and received a filing extension for his 2008 federal tax return. After receiving this extension, the defendant was obligated to file his federal tax return on or before October 15, 2009.

B. THE OFFENSE

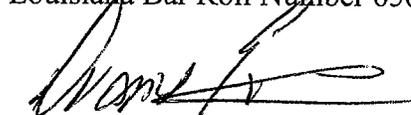
During the calendar year 2008, the defendant, **GIROD JACKSON**, who was a resident of Marrero, Louisiana, had and received gross income of approximately \$142,999. By reason of such gross income, he was required by law, following the close of the calendar year 2008 and on or before October 15, 2009 to make an income tax return to the Internal Revenue Service Center, at New Orleans, Louisiana, to a person assigned to receive returns at the local office of the Internal

Revenue Service at New Orleans, Louisiana, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing all of the foregoing, he did willfully fail, on or about October 15, 2009, in the Eastern District of Louisiana and elsewhere, to make an income tax return

In violation of Title 26, United States Code, Section 7203.


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New Orleans, Louisiana
August 22, 2013