

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR FALSE STATEMENTS ON TAX RETURNS
AND AGGRAVATED IDENTITY THEFT**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
VERSUS	*	SECTION:
CHRISTIE ROBINSON	*	VIOLATIONS: 18 U.S.C. § 2 18 U.S.C. § 1028A(a)(1) 26 U.S.C. § 7206(1)
	*	*

The Grand Jury charges that:

COUNT 1
(False Statements on a 2007 Tax Return)

A. AT ALL TIMES MATERIAL HEREIN:

1. The Internal Revenue Service is an agency of the Treasury Department of the United States of America responsible for administering and enforcing the tax laws of the United States, including the taxes paid into the treasury of the United States by its citizens.

2. **CHRISTIE ROBINSON** was the owner and operator of a tax return preparation business in Kenner, Louisiana called CRR Services, LLC.

3. **CHRISTIE ROBINSON** received fees charged for the preparation of individuals' tax returns.

B. THE FALSE STATEMENT:

4. On or about April 22, 2009, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTIE ROBINSON**, then a resident of Kenner, Louisiana did willfully make and subscribe an Amended 2007 U.S. Individual Tax Return Form 1040 which was verified by a written declaration that it was made under the penalties of perjury and which **CHRISTIE ROBINSON** did not believe to be true and correct as to every material matter. That the Amended 2007 tax return Form 1040 which was filed with the Internal Revenue Service stated and contained an amount of gross receipts received on the Amended 2007 Form 1040 Schedule C of \$80,789 which said amount was not in fact the amount of money she received as gross receipts on the Amended 2007 Form 1040 Schedule C, as **CHRISTIE ROBINSON** then and well knew this figure reported actually should have been \$276,501, the amount of money actually received as fees for tax return preparation for the year 2007, all in violation of Title 26, United States Code, Section 7206(1).

COUNT 2
(False Statements on a 2009 Tax Return)

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations contained in Paragraph A of Count 1 are hereby re-alleged and incorporated as if fully set forth herein.

B. THE FALSE STATEMENT:

2. On or about April 15, 2010, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTIE ROBINSON**, then a resident of Kenner, Louisiana did willfully make and subscribe a 2009 U.S. Individual Tax Return Form 1040 which was verified by a written declaration that

it was made under the penalties of perjury and which **CHRISTIE ROBINSON** did not believe to be true and correct as to every material matter. That the 2009 tax return Form 1040 which was filed with the Internal Revenue Service stated and contained an amount of gross receipts received on the 2009 Form 1040 Schedule C of \$100,898 which said amount was not in fact the amount of money she received as gross receipts on the 2009 Form 1040 Schedule C, as **CHRISTIE ROBINSON** then and well knew this figure reported actually should have been \$168,605, the amount of money actually received as fees for tax return preparation for the year 2009, all in violation of Title 26, United States Code, Section 7206(1).

COUNT 3
(False Statements on a 2010 Tax Return)

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations contained in Paragraph A of Count 1 are hereby re-alleged and incorporated as if fully set forth herein.

B. THE FALSE STATEMENT:

2. On or about April 15, 2011, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTIE ROBINSON**, then a resident of Kenner, Louisiana did willfully make and subscribe a 2010 U.S. Individual Tax Return Form 1040 which was verified by a written declaration that it was made under the penalties of perjury and which **CHRISTIE ROBINSON** did not believe to be true and correct as to every material matter. That the 2010 tax return Form 1040 which was filed with the Internal Revenue Service stated and contained an amount of gross receipts received on the 2010 Form 1040 Schedule C of \$71,456 which said amount was not in fact the amount of money she received as gross receipts on the 2010 Form 1040 Schedule C, as **CHRISTIE ROBINSON** then and well knew this figure reported actually should have been \$221,417, the amount of money actually received as fees for tax return preparation for the year 2010, all in violation of Title 26, United States Code, Section 7206(1).

COUNT 4
(False Statements on a 2011 Tax Return)

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations contained in Paragraph A of Count 1 are hereby re-alleged and incorporated as if fully set forth herein.

B. THE FALSE STATEMENT:

2. On or about April 15, 2012, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTIE ROBINSON**, then a resident of Kenner, Louisiana did willfully make and subscribe a 2011 U.S. Individual Tax Return Form 1040 which was verified by a written declaration that it was made under the penalties of perjury and which **CHRISTIE ROBINSON** did not believe to be true and correct as to every material matter. That the 2011 tax return Form 1040 which was filed with the Internal Revenue Service stated and contained an amount of gross receipts received on the 2011 Form 1040 Schedule C of \$170,728 which said amount was not in fact the amount of money she received as gross receipts on the 2011 Form 1040 Schedule C, as **CHRISTIE ROBINSON** then and well knew this figure reported actually should have been \$231,090, the amount of money actually received as fees for tax return preparation for the year 2011, all in violation of Title 26, United States Code, Section 7206(1).

COUNTS 5-7
(Aggravated Identity Theft)

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations contained in Paragraph A of Count 1 are incorporated as though full set forth herein.

B. AGGRAVATED IDENTITY THEFT:

2. On or about each of the dates listed below, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTIE ROBINSON**, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, during and in relation to wire fraud, in

violation of Title 18, United States Code, Section 1343, knowing that the means of identification belonged to an actual person known to the Grand Jury, identified by the initials below:

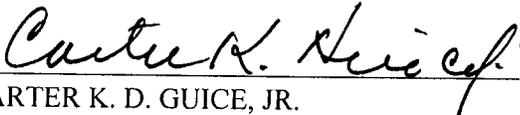
<u>Count</u>	<u>Date</u>	<u>Individual</u>
5	01-20-2011	WW
6	02-22-2011	RB
7	03-23-2011	JG

In that she specifically used personal identification information such as date of birth, social security number and name in filing tax returns wired on the date noted above without the victims' knowledge or permission, all in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY


CARTER K. D. GUICE, JR.
ASSISTANT UNITED STATES ATTORNEY
LA BAR #16771

New Orleans, Louisiana
April 2, 2015