

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**SHAWN SISCO** : **VIOLATIONS:**  
: **26 U.S.C. § 7206(2) (aiding and assisting**  
: **in the filing of a false tax returns - 31**  
: **counts)**

**INDICTMENT**

**COUNTS ONE THROUGH THIRTY-ONE**

**Introduction**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. The Internal Revenue Service was an agency within the United States Treasury Department charged with, among other things, enforcing the tax laws of the United States.

2. Income earners within the United States, who realized income at or beyond an amount established by law, were required to file federal income tax returns which reported the income received by the taxpayer.

**The Standard Deduction**

3. In determining the extent to which income received by a taxpayer was subject to federal income taxation, the taxpayer had the option of deducting a pre-determined amount of money from the taxpayer's gross income in computing the amount of income that was

subject to taxation. This particular option was known as the standard deduction, which was defined under United States tax law, as a dollar amount that a taxpayer who does not itemize deductions could subtract from their income which was based upon the taxpayer's filing status.

4. The standard deduction was available to US citizens and resident aliens (for tax purposes) who were individuals, married persons, and head of household.

5. The standard deduction was not available to nonresident aliens residing in the United States. Additional amounts were available for persons who were blind and/or were at least 65 years of age.

#### **Itemized Deductions**

6. In lieu of using the standard deduction, a taxpayer could add all statutorily approved income expense deductions together and report the totality of these expenses on IRS Schedule A and IRS Form 2106. This method of computing taxable income was known as itemizing deductions as opposed to using the standard deduction.

#### **False Returns**

7. Defendant SHAWN SISCO, the owner of SISCO ACCOUNTING, was a federal income tax preparer using her home as her place of business.

8. For tax years 2006 through 2009, defendant SHAWN SISCO prepared 31 tax returns on behalf of clients. The returns defendant SISCO prepared and caused to be filed included itemized deductions on IRS Form Schedule A which stated that the filers had claimed the following materially false expense deductions which were either non-existent or inflated: (a) medical and dental expenses; (b) charitable contributions, (d) mortgage interest, (e) cell phone

expenses, (f) property tax expenses (g) clothing and shoe expenses; and (h) laundry and maintenance expense.

9. The creation and inflation of the false Schedule A itemized deductions on the 31 tax returns prepared by defendant SHAWN SISCO resulted in an understatement of taxes owed of approximately \$165,648.

10. On or about the dates listed in the chart below, in the Eastern District of Pennsylvania and elsewhere, defendant

**SHAWN SISCO**

willfully aided, assisted, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of U.S. Individual Income Tax Returns, Forms 1040 and accompanying Schedules A, for taxpayers who are known to the Grand Jury, and who are identified below by initials, when defendant SISCO then and there knew and believed that the returns and accompanying schedules were materially false as described in the counts listed below:

<b><u>Count</u></b>	<b><u>Date Return Filed</u></b>	<b><u>Tax Filer's Initials</u></b>	<b><u>Tax Filing Year</u></b>	<b><u>Material False Matter</u></b>
1	02/19/2007	L.E.	2006	IRS Form 1040's Schedule A containing false itemized deductions
2	02/05/2008	L.E.	2007	IRS Form 1040's Schedule A containing false itemized deductions
3	01/27/2009	L.E.	2008	IRS Form 1040's Schedule A containing false itemized deductions

<b><u>Count</u></b>	<b><u>Date Return Filed</u></b>	<b><u>Tax Filer's Initials</u></b>	<b><u>Tax Filing Year</u></b>	<b><u>Material False Matter</u></b>
4	03/17/2007	T.I.	2006	IRS Form 1040's Schedule A containing false itemized deductions
5	02/15/2008	T.I.	2007	IRS Form 1040's Schedule A containing false itemized deductions
6	04/10/2009	T.I.	2008	IRS Form 1040's Schedule A containing false itemized deductions
7	02/19/2007	L.N.	2006	IRS Form 1040's Schedule A containing false itemized deductions
8	01/18/2008	L.N.	2007	IRS Form 1040's Schedule A containing false itemized deductions
9	01/24/2009	L.N.	2008	IRS Form 1040's Schedule A containing false itemized deductions
10	01/26/2007	T.L.	2006	IRS Form 1040's Schedule A containing false itemized deductions
11	01/30/2008	T.L.	2007	IRS Form 1040's Schedule A containing false itemized deductions
12	02/15/2009	T.L.	2008	IRS Form 1040's Schedule A containing false itemized deductions
13	02/24/2010	T.L.	2009	IRS Form 1040's Schedule A containing false itemized deductions
14	02/26/2007	D.Y.	2006	IRS Form 1040's Schedule A containing false itemized deductions

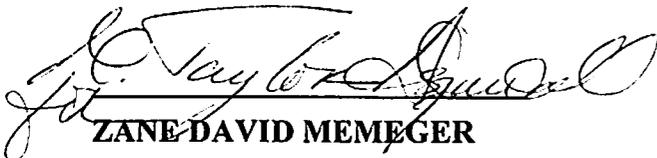
<u>Count</u>	<u>Date Return Filed</u>	<u>Tax Filer's Initials</u>	<u>Tax Filing Year</u>	<u>Material False Matter</u>
15	01/28/2008	D.Y.	2007	IRS Form 1040's Schedule A containing false itemized deductions
16	04/14/2009	D.Y.	2008	IRS Form 1040's Schedule A containing false itemized deductions
17	01/29/2007	C.S.	2006	IRS Form 1040's Schedule A containing false itemized deductions
18	02/01/2008	C.S.	2007	IRS Form 1040's Schedule A containing false itemized deductions
19	02/01/2009	C.S.	2008	IRS Form 1040's Schedule A containing false itemized deductions
20	01/29/2010	C.S.	2009	IRS Form 1040's Schedule A containing false itemized deductions
21	02/10/2007	R.M.	2006	IRS Form 1040's Schedule A containing false itemized deductions
22	02/02/2008	R.M.	2007	IRS Form 1040's Schedule A containing false itemized deductions
23	03/23/2009	R.M.	2008	IRS Form 1040's Schedule A containing false itemized deductions
24	02/02/2010	R.M.	2009	IRS Form 1040's Schedule A containing false itemized deductions
25	02/12/2009	U.J.	2008	IRS Form 1040's Schedule A containing false itemized deductions

<u>Count</u>	<u>Date Return Filed</u>	<u>Tax Filer's Initials</u>	<u>Tax Filing Year</u>	<u>Material False Matter</u>
26	02/04/2008	S.W.	2007	IRS Form 1040's Schedule A containing false itemized deductions
27	02/13/2009	S.W.	2008	IRS Form 1040's Schedule A containing false itemized deductions
28	01/28/2010	S.W.	2009	IRS Form 1040's Schedule A containing false itemized deductions
29	03/25/2007	T.D. & M.V.	2006	IRS Form 1040's Schedule A containing false itemized deductions
30	03/27/2009	T.D. & M.V.	2007	IRS Form 1040's Schedule A containing false itemized deductions
31	04/14/2009	T.D. & M.V.	2008	IRS Form 1040's Schedule A containing false itemized deduction.

All in violation of Title 26, United States Code, Section 7206(2).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**