

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	
)	Violation: Title 26, United States Code,
REGINA EVANS and)	Section 7206(1)
RONALD EVANS)	

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. Prime Time Transportation and Security, Inc., doing business as “Prime Time Limousine,” was a Chicago company that provided transportation and security services. Defendants REGINA EVANS and RONALD EVANS lived in County Club Hills and jointly owned and operated Prime Time.

b. Defendants REGINA EVANS and RONALD EVANS owned Prime Time as a sole proprietorship. They filed United States Individual Income Tax Returns (Forms 1040) in which they included Schedule C forms that set forth the gross receipts, expenses, and net profit or loss of Prime Time, with the net profit or loss being reported as part of the total income on those returns.

c. In 2007, Prime Time’s gross receipts totaled more than approximately \$360,649.

2. On or about June 5, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

REGINA EVANS and
RONALD EVANS,

defendants herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2007, which return was filed with the Internal Revenue Service and was verified by an electronic return originator personal identification number that it was made under the penalties of perjury, and which income tax return defendants did not believe to be true and correct as to every material matter, in that said return reported on line 1 of Schedule C that Prime Time's gross receipts were approximately \$205,290, when defendants knew and believed that Prime Time's gross receipts for 2007 substantially exceeded that amount;

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

COUNT TWO

The UNITED STATES ATTORNEY further charges:

1. Subparagraphs 1(a) and (b) of Count One are incorporated here.
2. At times material to this information:
 - a. In 2008, Prime Time's gross receipts totaled more than approximately \$291,414.
3. On or about May 19, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

REGINA EVANS and
RONALD EVANS,

defendants herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2008, which return was filed with the Internal Revenue Service and was verified by a written declaration that it was made under the penalties of perjury, and which income tax return defendants did not believe to be true and correct as to every material matter, in that said return reported on line 1 of Schedule C that Prime Time's gross receipts were approximately \$150,630, when defendants knew and believed that Prime Time's gross receipts for 2008 substantially exceeded that amount;

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

COUNT THREE

The UNITED STATES ATTORNEY further charges:

1. Paragraphs 1(a) and (b) of Count One are incorporated here.

2. At times material to this information:

a. In 2009, Prime Time's gross receipts totaled more than approximately \$201,297.

b. Defendant REGINA EVANS founded and ran an organization called We Are Our Brother's Keeper that, in or about 2009, received a \$1,250,000 employment-opportunities grant from the Illinois Department of Commerce and Economic Opportunity for the purpose of providing pre-apprenticeship educational and vocational training for certain people employed in building trades, such as bricklayers and electricians.

c. Defendants REGINA EVANS and RONALD EVANS used more than approximately \$500,000 of the grant money for non-grant-related personal purposes, thereby converting that money to personal income.

3. On or about May 12, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

REGINA EVANS and
RONALD EVANS,

defendants herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Individual Income Tax Return (Form 1040 with schedules and attachments), for

the calendar year 2009, which return was filed with the Internal Revenue Service and was verified by an electronic return originator personal identification number that it was made under the penalties of perjury, and which income tax return defendants did not believe to be true and correct as to every material matter, in that: (1) said return reported on line 1 of a Schedule C that Prime Time's gross receipts were approximately \$150,000, when defendants knew and believed that Prime Time's gross receipts for 2009 substantially exceeded that amount; and (2) said return reported on line 21 of Form 1040 that defendants did not have other income for tax year 2009, when defendants knew and believed that they had other income based on their conversion of at least approximately \$500,000 in grant money;

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY