

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No.
ALIDU DRAMANI : 18 U.S.C. § 286

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information, defendant ALIDU DRAMANI was a resident of Irvington, New Jersey, and was employed as a nurse at the North Jersey Developmental Center in Totowa, New Jersey, a mental health institution operated by the State of New Jersey.

2. At all times relevant to this Information, the Internal Revenue Service was an agency of the United States within the Department of Treasury, responsible for administering and enforcing the tax laws of the United States, and collecting the taxes that are due and owing to the Treasury of the United States, including federal income taxes

3. From in or around 2010 to in or around early August 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

ALIDU DRAMANI

did knowingly and intentionally agree, combine and conspire with others to defraud the United States and a department and agency thereof, specifically the United States Department of the Treasury, Internal Revenue Service, by obtaining and aiding to obtain the payment and allowance

of false, fictitious and fraudulent claims, namely, fraudulent income tax returns claiming refunds for the tax years 2010 and 2011.

Object of the Conspiracy

4. It was the object of the conspiracy for defendant ALIDU DRAMANI and his coconspirators to enrich themselves by submitting fraudulent federal income tax returns that claimed tax refunds to which they were not entitled.

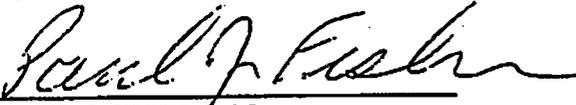
Means and Methods of the Conspiracy

5. It was part of the conspiracy that defendant ALIDU DRAMANI would steal identity information, i.e., names and social security numbers, belonging to patients confined to the North Jersey Developmental Center (the "Developmental Center").

6. It was a further part of the conspiracy that defendant ALIDU DRAMANI would provide the stolen identity information to a coconspirator, who was a tax preparer, to file false tax returns in the names and social security numbers of the patients without their knowledge, seeking federal tax refunds to which the coconspirators were not entitled.

7. It was a further part of the conspiracy that, as a result of defendant ALIDU DRAMANI'S participation in the conspiracy, tax preparers filed, attempted and intended to file false tax returns for the tax years 2010 through 2011 seeking approximately \$340,026 in tax refunds.

In violation of Title 18, United States Code, Section 286.


PAUL J. FISHMAN
UNITED STATES ATTORNEY

Criminal Number: 13-

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Title 18, United States Code, Section 286

PAUL J. FISHMAN

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