2010R01075

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 15-
	:	
v.	:	18 U.S.C. § 1001(a)(2)
	:	
ABDUS MIAN	:	

INFORMATION

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

BACKGROUND

1. At all times relevant to this Information:

a. Defendant ABDUS MIAN was the bookkeeper for a business located in Atlantic City, New Jersey (the "Business"). Defendant ABDUS MIAN resided in Atlantic County, New Jersey.

b. William Boland was a one-third owner of the Business.

c. Co-Conspirator-1 ("CC-1") was a one-third owner of the Business.

d. Co-Conspirator-2 ("CC-2") was a one-third owner of the Business, who acquired an ownership share of the Business in the early part of 2007. CC-2's share of the Business was in the name of a nominee owner, Individual-1.

e. As owners of the Business, William Boland, CC-1, and CC-2 were responsible for accurately reporting income received by the Business to the Internal Revenue Service ("IRS"). William Boland, CC-1, and CC-2 also were each responsible for accurately reporting their respective personal income to the IRS each year.

2. As co-owners of the Business, William Boland, CC-1, and CC-2 concealed gross

cash receipts from the operation of the Business from the IRS.

3. As the bookkeeper for the Business, defendant ABDUS MIAN prepared a second set of books for the Business, which tracked the unreported cash removed from the Business and received by William Boland, CC-1, and Individual-1.

FALSE STATEMENTS

4. On or about June 9, 2011, in Atlantic City, New Jersey, defendant ABDUS MIAN was interviewed by Special Agents from the IRS and the Federal Bureau of Investigation ("FBI"), at which time defendant ABDUS MIAN falsely stated, among other things, that the Business only maintained one set of books, that he never prepared a second set of books for the Business, and that he was unaware of any of the owners removing cash from the Business.

5. On or about June 9, 2011, in Atlantic County, in the District of New Jersey and elsewhere, defendant

ABDUS MIAN

knowingly and willfully made materially false, fictitious and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the IRS and the FBI, knowing that such statements and representations were materially false, fictitious, and fraudulent.

In violation of Title 18, United States Code, Section 1001(a)(2).

Paul J. Fishman

PAUL J. FISHMAN
United States Attorney

CASE NUMBER:_____

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

ABDUS MIAN

INFORMATION FOR

18 U.S.C. § 1001(a)(2)

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