

FILED  
At Albuquerque NM

MAY 01 2014 *ed*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO MATTHEW J. DYKMAN  
CLERK

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
**EDWARD ALBERT MARQUEZ,** )  
)  
Defendant. )

CRIMINAL NO. 14-1444 JB  
Count 1: 26 U.S.C. § 7206(1): Making and  
Subscribing a False Tax Return,  
Count 2: 26 U.S.C. § 7206(2) Aiding and  
Assisting the Presentation of a False Tax  
Return

INFORMATION

The United States Attorney charges:

Count 1

On or about April 15, 2010, in the State and District of New Mexico, and elsewhere, the defendant, **EDWARD ALBERT MARQUEZ**, did willfully make and subscribe a tax return, namely, an Internal Revenue Service Form 1040 Individual Tax Return for the year 2009, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said tax return he did not believe to be true and correct as to every material matter, in that the said tax return reports no income from Club Tropicana, when in truth and in fact, as he then and there well knew and believed, the defendant, **EDWARD ALBERT MARQUEZ**, had income from Club Tropicana for the year 2009 substantially in excess of the reported amount, resulting in a tax loss to the United States in the approximate amount of \$32,701

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

Count 2

On or about April 15, 2010, in the State and District of New Mexico, and elsewhere, the defendant, **EDWARD ALBERT MARQUEZ**, did willfully aid and assist in, and procure, counsel and advise the preparation and presentation to the Internal Revenue Service, of the Internal Revenue Service Form 1040 Individual Tax Return of Toni Quintana, which was false and fraudulent as to a material matter, in that the return falsely reported gross receipts on Schedule C for Club Tropicana for the year 2009 in the amount of \$208,307, when in truth and in face, as the defendant, **EDWARD ALBERT MARQUEZ**, then and there well knew and believed, the gross receipts for Club Tropicana substantially exceeded the reported amount, resulting in a tax loss to the United States in the approximate amount of \$81,040.

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

DAMON P. MARTINEZ  
Acting United States Attorney



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