IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	
	:	**Criminal No.**
v.	:	
	:	
THOMAS G. EHR,	:	**VIOLATIONS:**
	:	
Defendant.	:	**18 U.S.C. § 371 (Conspiracy to Defraud the United States)**
	:	**26 U.S.C. § 7203 (Willful Failure to File)**

INFORMATION

The United States of America charges that:

COUNT ONE

1. From at least in or about December 2010, through in or about October 2020, in the District of Columbia and elsewhere, the defendant, THOMAS G. EHR, a resident of the United Kingdom, China, Serbia, and Ibiza and/or Mallorca, Spain, knowingly, voluntarily, and intentionally agreed with Douglas Edelman ("Edelman"), Delphine Le Dain ("Le Dain"), and others to defraud the United States of America by concealing Edelman's ownership and control of Mina Corp. and Red Star Enterprises Ltd. (collectively, "Mina/Red Star") and other businesses funded with Mina/Red Star profits, in order to obstruct the Internal Revenue Service from assessing and collecting Edelman's federal income taxes—including taxes Edelman owed on profits he made from contracts with the United States Department of Defense. Through various means such as using nominees and providing false information to third parties, EHR and others took steps to conceal Edelman's identity as the owner of entities, bank accounts, and

interests in businesses. Specifically, EHR committed the following overt acts in furtherance of the conspiracy, among others:

a. In June 2016, EHR witnessed Le Dain's signature on a "deed of gift" for $4 million, falsely purporting to be a gift from Le Dain to Edelman for the payment of Edelman's U.S. tax liabilities, when EHR knew that Edelman controlled the flow of funds and did not need a "gift" to make any payments;

b. In June 2020, EHR contacted a Gibraltar corporate services business to ask that the public registration information for Mina Corp. and Red Star Enterprises Ltd. be changed to reflect, falsely, that the 50% owner of the companies was Le Dain, not Edelman, when EHR knew that Edelman had been the owner of the companies from the beginning but that Edelman wanted the record changed in order to conceal the truth.

c. In October 2020, after a financial institution inquired about the ownership of Mina/Red Star, EHR helped draft a response asserting, falsely, that Edelman never had any ownership interest in Mina/Red Star.

(Title 18, United States Code, Section 371)

COUNT TWO

2. From at least June 15, 2011, through in or about June 15, 2024, in the District of Columbia and elsewhere, the defendant, THOMAS G. EHR, a resident of the United Kingdom, China, Serbia, and Ibiza and/or Mallorca, Spain, willfully failed to file Forms 1040, U.S. Individual Income Tax Returns ("Forms 1040") and pay any tax due and owing for tax years 2010 to 2015, and willfully failed to pay any of the tax due and owing for tax years 2016 to 2023, knowing that he was required to file timely Forms 1040 and make full payments to the Internal Revenue Service.

(Title 26, United States Code, Section 7203)

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By: ________________________

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