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U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR WILLFULLY MAKING
AND SUBSCRIBING A FALSE INCOME TAX RETURN**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

15-264

v.

*

SECTION:

SECT. C MAG. 5

ROMMEL CORDOVA
SAUL RAMIREZ

*

VIOLATION: 26 U.S.C. § 7206(1)

* * *

The United States Attorney charges that:

COUNT 1

(Willfully Making and Subscribing a False Income Tax Return)

A. AT ALL TIMES MATERIAL HEREIN

1. Defendant **ROMMEL CORDOVA** resided in Luling, Louisiana, which is within the Eastern District of Louisiana.

2. Defendant **SAUL RAMIREZ** resided in Kenner, Louisiana, which is within the Eastern District of Louisiana.

3. Defendants **ROMMEL CORDOVA** and **SAUL RAMIREZ** owned and operated Skill Labor Provider, Inc. ("Skill Labor"), which was a Louisiana corporation that operated a labor services business in and around Metairie, Louisiana.

4. Defendants **ROMMEL CORDOVA** and **SAUL RAMIREZ** were each fifty-percent owners of Skill Labor and shared equally in its net income.

5. For tax years 2010-2012, defendants **ROMMEL CORDOVA** and **SAUL RAMIREZ** caused corporate income tax returns, Forms 1120, for Skill Labor to be prepared and signed within the Eastern District of Louisiana. These corporate income tax returns did not accurately report the gross receipts, labor expense deductions, or net income of Skill Labor.

6. During calendar years 2010 and 2011, defendants **ROMMEL CORDOVA** and **SAUL RAMIREZ** cashed, and caused to be cashed, checks made payable to Skill Labor and other business checks at a check cashing business in Kenner, Louisiana.

7. Defendants **ROMMEL CORDOVA** and **SAUL RAMIREZ** caused their respective individual federal income tax returns to be prepared, signed, and filed in the Eastern District of Louisiana. These individual income tax returns did not accurately report the amounts of business income the defendants received from Skill Labor.

B. THE OFFENSE

1. On or about March 20, 2012, in the Eastern District of Louisiana and elsewhere, defendant **ROMMEL CORDOVA** did willfully make and subscribe a 2011 Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury, and which he did not believe to be true and correct as to every material matter, in that, among other things, it reported the amount of total income on Line 22 was \$97,324, whereas, as he then and there well knew and believed, the amount of total income was substantially greater than the amount reported.

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

COUNT 2
(Willfully Making and Subscribing a False Tax Return)

A. AT ALL TIMES MATERIAL HEREIN

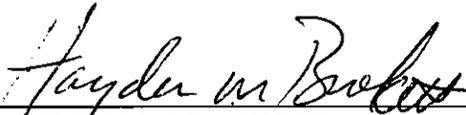
1. The allegations contained in Section A of Count 1 above are realleged and incorporated as if set forth fully herein.

B. THE OFFENSE

2. On or about March 20, 2012, in the Eastern District of Louisiana and elsewhere, defendant **SAUL RAMIREZ** did willfully make and subscribe a 2011 Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury, and which he did not believe to be true and correct as to every material matter, in that, among other things, it reported the amount of total income on Line 22 was \$41,985, whereas, as he then and there well knew and believed, the amount of total income was substantially greater than the amount reported.

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

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY


HAYDEN M. BROCKETT
Assistant United States Attorney
MICHAEL HATZIMICHALIS
Trial Attorney
Department of Justice, Tax Division

New Orleans, Louisiana
November 4, 2015