

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 15-83</b>
<b>VERSUS</b>	*	<b>SECTION: "B" (4)</b>
<b>CHRISTIE ROBINSON</b>	*	
	*	*
	*	*

**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, **CHRISTIE ROBINSON**. The Defendant has agreed to plead guilty in the Indictment charging her with four counts of false statements in violation of Title 26, United States Code, Section 7206(1).

The Internal Revenue Service is an agency of the Treasury Department of the United States of America responsible for administering and enforcing the tax laws of the United States, including the taxes paid into the treasury of the United States by its citizens.

**CHRISTIE ROBINSON** was the owner and operator of a tax return preparation business in Kenner, Louisiana called CRR Services, LLC. **CHRISTIE ROBINSON** received fees charged for the preparation of individuals' tax returns.

On or about April 22, 2009, April 12, 2010, April 15, 2011 and April 15, 2012 in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTIE ROBINSON**, then a resident of Kenner, Louisiana did willfully make and subscribe an Amended Form 1040 for 2007 and Form 1040 for 2009, 2010 and 2011 which was verified by a written declaration that it was made under the penalties of perjury and which **CHRISTIE ROBINSON** did not believe to be true and correct as to every material matter, as set out below:

AMOUNT DECLARED		GROSS RECEIPTS	DIFFERENCE
2007	\$80,789	\$276,501	\$195,712
2009	\$100,898	\$129,111	\$28,213
2010 <i>Call ac</i>	<del>\$71,456</del> 76,500	\$158,672	\$82,172
2011 <i>Call ac</i>	<del>\$170,728</del> 175,762	\$184,668	\$8,906
TOTAL <i>Call ac</i>	<del>\$423,871</del> 433,949	\$748,953	\$315,004

The tax loss resulting from failure to include the full amount of received is \$104,481.40.

The facts would have been proven with testimony of employees of the Internal Revenue Service, Criminal Investigation, as well as witness and documents from various financial institutions.

**READ AND APPROVED:**

*Carter K. Guice, Jr.*  
CARTER K. D. GUICE, JR.  
Assistant United States Attorney  
Louisiana Bar #16771

MAY, 18, 2016  
DATE

*[Signature]*  
CHRISTIE ROBINSON  
Defendant

5/18/16  
DATE

*[Signature]*  
CHRISTEN CHAPMAN, ESQ.  
Assistant Federal Public Defender  
Attorney for Defendant

5-18-16  
DATE