UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	**CRIMINAL NO. 18-246**
v.	*	**SECTION: "G"**
PEGGY NAGELE	*	
	* * *	

FACTUAL BASIS

The defendant, **PEGGY NAGELE ("NAGELE")**, has agreed to plead guilty as charged to the one-count bill of information charging her with false statements on a tax return, in violation of 26 U.S.C. § 7206(1), False Statement on a Tax Return.

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the bill of information now pending against the defendant:

For the tax year 2011, **NAGELE** made a willful, intentional and material false statement on her tax return, filed January 2013 with the Internal Revenue Service ("IRS"), mailed and sworn to in the Eastern District of Louisiana.

Defendant Peggy **NAGELE** was employed for law firm "A," a New Orleans plaintiff's attorney who also held substantial real estate. The company which managed these assets was company "A". Peggy **NAGELE** had unfettered access to the checkbooks and financial assets of law firm A and company A. She illicitly obtained approximately $727,847.80 from law firm A by writing checks made payable to herself from the operating account of the firm. She disguised her thefts by either making the checks payable to routine vendor, for example, a utility company or office supply store, or simply did not record the check in the check register. The checks were

then deposited into either Mortgage Lending Group, a business that **NAGELE** and her family controlled, or Nagele Corporation, another business controlled by the defendant.

Her total thefts from the two entities, Firm A and Company A, amounted to $5,083,601.22. She is only being charged with undeclared thefts for the tax year 2011.

On the 2011 federal income tax return sworn to be true by **NAGELE** and mailed from the Eastern District of Louisiana, defendant declared a total income of $73,483 and taxable income of $1,345.00, when in truth and fact she failed to include the $727,847.80 she had stolen from law firm A as income.

The above facts would be proven by the testimony of employees of the Internal Revenue Service – Criminal Investigations Division, employees of various financial institutions, and forensic accountants, as well as financial records and federal tax returns.

Carter K. Guice Jr. — Jan. 24, 2019

CARTER K. D. GUICE, JR.
Assistant United States Attorney

Date

Peggy Nagele — 1/24/19

PEGGY NAGELE
Defendant

Date

1-24-19

GARY SCHWABE
Attorney for Defendant

Date