

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO. 18-246

v.

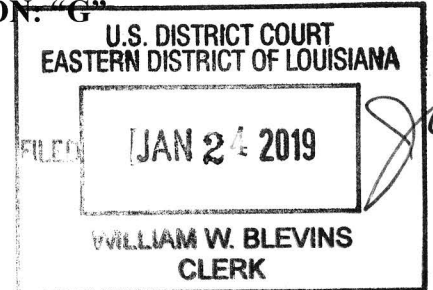
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SECTION: "G"

PEGGY NAGELE

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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

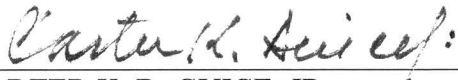
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then deposited into either Mortgage Lending Group, a business that **NAGELE** and her family controlled, or Nagele Corporation, another business controlled by the defendant.

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.



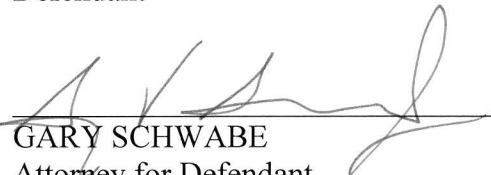
CARTER K. D. GUICE, JR.
Assistant United States Attorney

Jan. 24, 2019
Date



PEGGY NAGELE
Defendant

1/24/19
Date



GARY SCHWABE
Attorney for Defendant

1-24-19
Date