

FILED **AT**
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
AUG 03 - 3 1:57
SHIRLEY A. FLEMING

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR AIDING AND
ASSISTING THE PRESENTATION OF A FALSE TAX RETURN**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

19-200

v.

*

SECTION

SECT L MAG 5

DANIELLE FRANKLIN

*

VIOLATION: 26 U.S.C. § 7206(2)

*

* * *

The Grand Jury charges that:

COUNT 1

(Aiding and Assisting the Preparation and Presentation of a False Tax Return)

A. AT ALL TIMES MATERIAL HEREIN:

1. Cutting Edge Income Tax was a tax preparation business located at 7809 Airline Drive, Metairie, Louisiana, within the Eastern District of Louisiana.

2. Defendant **DANIELLE FRANKLIN**, the owner of Cutting Edge Income Tax, resided in Orleans Parish, within the Eastern District of Louisiana.

☒ Fee **USA**
☐ Process
☒ Dkt'd
☐ ClRMDep
☐ Doc. No.

3. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the United States.

B. THE OFFENSE:

4. The general allegations in paragraphs 1-3 are realleged and incorporated by reference as though fully set forth herein.

5. On or about January 29, 2015, in the Eastern District of Louisiana and elsewhere, defendant **DANIELLE FRANKLIN** did willfully aid and assist in, and procure, counsel and advise the preparation and presentation to the IRS of a 2014 tax year U.S. Individual Income Tax Return and an IRS Form 1040 for the taxpayer N.G., which the defendant did not believe to be true and correct as to every material matter, in that the return contained false and fraudulent loss amounts in the amount of \$104,401.00 set forth as Business Losses (Schedule C), when in fact the defendant knew that N.G. had zero claimed Business Losses (Schedule C); all in violation of Title 26, United States Code, Section 7206(2).

A TRUE BILL:


FOREPERSON

PETER G. STRASSER
UNITED STATES ATTORNEY


EDWARD J. RIVERA
Assistant United States Attorney

New Orleans, Louisiana
October 3, 2019