

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
) Case No.
)
)
) Violations: Title 26, United States
EDWARD ACEVEDO) Code, Sections 7201 and 7203

COUNT ONE

THE SPECIAL JANUARY 2019 GRAND JURY charges:

1. At times material to this indictment:

a. The Internal Revenue Service was an agency of the United States Department of Treasury, responsible for administering and enforcing the tax laws of the United States. Under these laws, individuals were required to accurately report income to the Internal Revenue Service on individual income tax return forms (Form 1040 with schedules and attachments) and pay all income tax and tax penalties due and owing. If a taxpayer failed accurately to report or pay his or her tax liability, the Internal Revenue Service could calculate, assess, and attempt to collect the correct tax liability.

b. Company A was a limited liability company organized under the laws of the State of Illinois that maintained a bank account at JP Morgan Chase Bank, in Chicago, Illinois.

c. Defendant EDWARD ACEVEDO was a resident of the Northern District of Illinois and maintained a personal bank account at Chicago Patrolmen's

Federal Credit Union in Chicago, Illinois. ACEVEDO was associated with Company A.

2. During calendar year 2017, ACEVEDO received gross income of approximately \$130,775, which included approximately \$82,533 in income received from Company A or purportedly paid to ACEVEDO on account of work performed by Company A. On this gross income, after accounting for withholding, ACEVEDO owed to the United States federal income tax of approximately \$19,852. ACEVEDO was required by law, following the close of calendar year 2017, and on or before October 15, 2018, to file a Form 1040 individual income tax return with the Internal Revenue Service and to pay such income tax.

3. ACEVEDO failed to file a Form 1040 individual income tax return for the calendar year 2017 on or before October 15, 2018.

4. Throughout calendar year 2017, and continuing thereafter until the date of this indictment, in the Northern District of Illinois, Eastern Division,

EDWARD ACEVEDO,

defendant herein, did willfully attempt to evade and defeat the federal income tax due and owing by him to the United States for the calendar year 2017 by committing the following affirmative acts, among others:

- a. receiving payments in cash to conceal his gross income;
- b. making cash deposits into his personal bank account to conceal the nature and source of payments made to him;

c. directly depositing checks into his personal bank account that were made in payment for services purportedly rendered by Company A;

d. handling his affairs in a manner so as to avoid the creation and maintenance of customary business and accounting records concerning actual revenues received and expenses incurred; and

e. causing his accountant to file a Form 4868 (application for automatic extension of time to file U.S. individual income tax return) with the Internal Revenue Service for calendar year 2017 that provided ACEVEDO's estimated tax liability was \$0 and included no payment of estimated taxes.

In violation of Title 26, United States Code, Section 7201.

COUNT TWO

THE SPECIAL JANUARY 2019 GRAND JURY further charges:

1. Paragraph one of Count One is incorporated here by reference.
2. During calendar year 2018, ACEVEDO received gross income of approximately \$127,708, which included approximately \$65,000 in income received from Company A or purportedly paid to ACEVEDO on account of work performed by Company A. On this gross income, after accounting for withholding, ACEVEDO owed to the United States federal income tax of approximately \$15,498. ACEVEDO was required by law, following the close of calendar year 2018, and on or before October 15, 2019, to file a Form 1040 individual income tax return with the Internal Revenue Service and to pay such income tax.
3. ACEVEDO failed to file a Form 1040 individual income tax return for the calendar year 2018 on or before October 15, 2019.
4. Throughout calendar year 2018, and continuing thereafter until the date of this indictment, in the Northern District of Illinois, Eastern Division,

EDWARD ACEVEDO,

defendant herein, did willfully attempt to evade and defeat the federal income tax due and owing by him to the United States for the calendar year 2018 by committing the following affirmative acts, among others:
 - a. receiving payments in cash to conceal his gross income;

- b. making cash deposits into his personal bank account to conceal the nature and source of payments made to him;
- c. directly depositing checks into his personal bank account that were made in payment for services purportedly rendered by Company A;
- d. handling his affairs in a manner so as to avoid the creation and maintenance of customary business and accounting records concerning actual revenues received and expenses incurred;
- e. causing his accountant to file a Form 4868 (application for automatic extension of time to file U.S. individual income tax return) with the Internal Revenue Service for calendar year 2018 that provided ACEVEDO's estimated tax liability was \$0 and included no payment of estimated taxes; and
- f. providing false and incomplete information to his accountant for purposes of preparing a 2018 individual income tax return.

In violation of Title 26, United States Code, Section 7201.

COUNT THREE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 15, 2016, in the Northern District of Illinois,

EDWARD ACEVEDO,

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return, and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of the calendar year 2015 and on or before October 15, 2016, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

COUNT FOUR

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 15, 2017, in the Northern District of Illinois,

EDWARD ACEVEDO,

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return, and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of the calendar year 2016 and on or before October 15, 2017, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

COUNT FIVE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 15, 2018, in the Northern District of Illinois,

EDWARD ACEVEDO,

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return, and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of the calendar year 2017 and on or before October 15, 2018, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

COUNT SIX

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 15, 2019, in the Northern District of Illinois,

EDWARD ACEVEDO,

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return, and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of the calendar year 2018 and on or before October 15, 2019, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY