

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	Criminal No. 25-
v.	:	
	:	26 U.S.C. § 7201
JOSE CAMILO PEREZ, JR.	:	

**INFORMATION**

The defendant having waived in open court prosecution by Indictment and any objection based on venue, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
  - a. Defendant JOSE CAMILO PEREZ, JR. was a resident of Gloucester County, New Jersey.
  - b. Scan Group, Inc. was a Pennsylvania company. While Individual-1 was the nominal owner of Scan Group, Inc., defendant JOSE CAMILO PEREZ, JR. controlled Scan Group Inc. from his residence in Gloucester County, New Jersey and received all payments to, and profits from, Scan Group, Inc.
  - c. The Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury, responsible for administering and enforcing the tax laws of the United States and collecting the taxes that were due and owing to the Treasury of the United States by its citizens and businesses.

d. A U.S. Individual Income Tax Return (“Form 1040”) was the form filed by a taxpayer and used by the IRS to assess liability for personal income tax and eligibility for refunds.

e. Generally, individuals were required by law to prepare and file Form 1040 income tax returns with the IRS by April 15 of the year following the year when the income was earned unless an extension was granted. If those income tax returns showed that income taxes were due and owing, then the taxpayer was obligated by law to pay that sum of money to the IRS.

2. From in or about 2016 through in or about 2023, Scan Group, Inc. received checks and other business receipts totaling more than \$8,000,000.

3. From in or about 2016 through in or about 2023, defendant PEREZ attempted to evade the assessment of federal income taxes by, among other things, cashing checks payable to Scan Group, Inc. at a check cashing business in Philadelphia, Pennsylvania rather than depositing those checks into either his personal bank account or into Scan Group’s bank account. Defendant PEREZ then used some of the money for personal expenses. Defendant PEREZ also used the cash to pay payroll.

4. Defendant PEREZ was required to report and pay federal income taxes on the income that he received through Scan Group, Inc. For tax year 2016 and each tax year from 2018 through 2023, defendant PEREZ did not file a Form 1040 individual income tax return or pay any personal income taxes despite the fact that he received millions of dollars through Scan Group, Inc. during those years.

5. Defendant PEREZ filed a Form 1040 for tax year 2017, in 2022. The 2017 Form 1040 that defendant PEREZ filed significantly underreported his income for tax year 2017.

6. Defendant PEREZ attempted to evade detection by the IRS by, among other things, cashing the checks payable to Scan Group, Inc. at a check cashing business rather than using a bank and using Individual-1 as the nominal owner of Scan Group, Inc. to hide his control of Scan Group, Inc.


7. From tax year 2016 through tax year 2023, defendant PEREZ evaded more than \$3,000,000 of personal income taxes.

8. On or about April 15, 2023, in Gloucester County, in the District of New Jersey, and elsewhere, defendant

JOSE CAMILO PEREZ, JR.

did willfully attempt to evade and defeat a substantial personal income tax due and owing by him to the United States, for the tax year 2022, by cashing checks payable to Scan Group Inc. at a check cashing business to hide the business receipts, by using the funds to pay for his personal expenses, and by failing to file a U.S. Individual Income Tax Return, IRS Form 1040, for tax year 2022, thereby concealing and attempting to conceal from the IRS his true and correct income. As a result of such, there was a tax due and owing to the United States, of approximately \$808,514.

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

  
VIKAS KHANNA  
Acting United States Attorney

**CASE NUMBER: 25-CR-**

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**v.**

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**INFORMATION FOR**

**26 U.S.C. § 7201**

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VIKAS KHANNA  
ACTING UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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