

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
: UNITED STATES OF AMERICA :
: :
: - v. - : INFORMATION
: :
: MICHAEL GYURE, : 19 Cr.
: :
: Defendant. :
: :
- - - - - x

COUNT ONE

**(Subscribing to False Individual Income Tax Returns
for Tax Years 2012-2015)**

The United States Attorney charges:

1. Pursuant to the Internal Revenue Code and attendant regulations, individual U.S. citizens and residents are generally required to report accurately their income, tax obligations, and, where appropriate, any claim for a refund annually on a United States Individual Income Tax Return, Form 1040 ("Form 1040"), which must be filed with the Internal Revenue Service ("IRS").

2. At all times relevant to this Information, MICHAEL GYURE, the defendant, was a citizen of the United States and a resident of, among other places, New York, New York.

3. At all times relevant to this Information, MICHAEL GYURE, the defendant, was the Executive Director of a private club (the "Club"), located in New York, New York.

4. In or about 2012, MICHAEL GYURE, the defendant, entered into an agreement extending his employment as Executive Director of the Club (the "Employment Agreement"). The Employment Agreement provided, among other things, that GYURE was to be paid a salary and was entitled to receive "an auto allowance, dry cleaning, entertainment, travel and other personal expenses consistent with expenses incurred by [the] previous Executive Director of the [Club]."

5. Between in or about 2012 and in or about 2016, MICHAEL GYURE, the defendant, received more than approximately \$273,000 in the form of reimbursements and direct payments for personal expenses from the Club. For example, between in or about 2012 and in or about 2016, the Club reimbursed GYURE or paid directly for expenses related to, among other things, the purchase of wine sent to GYURE's home, personal international travel undertaken by GYURE and his family, and purchases of clothing and groceries.

6. In addition, the Club had at various points since MICHAEL GYURE, the defendant, was hired as Executive Director in or about 2007 made loans to GYURE. Between in or about 2012 and in or about 2016, the Club, at GYURE'S request, reclassified more than \$160,000 in loans to GYURE as compensation.

7. The payments of the personal expenses to MICHAEL GYURE, the defendant, and reclassification of loans to GYURE as

compensation came at a time when GYURE, as Executive Director of the Club, knew that the Club was attempting to address a reduction in revenues and related cash management issues. By in or about 2015, for example, vendors utilized by the Club in connection with the Club's day-to-day operations and the production of Club events were repeatedly asked to accept reduced or late payments on amounts due. Additionally, during the period between 2015 and 2016, the Club failed to pay several hundred thousand dollars in sales taxes to the State of New York.

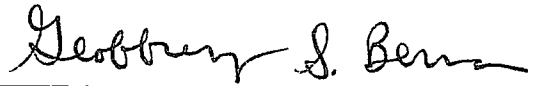
8. The Forms 1040 that MICHAEL GYURE, the defendant, caused to be filed with the IRS for tax years 2012, 2013, 2014, and 2015 failed to report both the income earned by GYURE in connection with the Club's payment of his personal expenses and the income earned as a result of the reclassification by the Club of loans previously made to Gyure as compensation. As a result, those Forms 1040 understated GYURE's income and were materially false.

Statutory Allegation

9. Between in or about 2013 and in or about 2016, in the Southern District of New York and elsewhere, MICHAEL GYURE, the defendant, willfully and knowingly did make and subscribe false and fraudulent United States Individual Income Tax Returns, Forms 1040, for the 2012, 2013, 2014, and 2015 tax

years, which returns contained and were verified by written declarations that they were made under penalties of perjury, and which returns GYURE did not believe to be true and correct as to every material matter, to wit, the Forms 1040 underreported GYURE's income by failing to disclose his employer's payment of personal expenses and reclassification of loans as compensation.

(Title 26, United States Code, Section 7206(1).)



GEOFFREY S. BERMAN
United States Attorney

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(26 U.S.C. § 7206(1).)

GEOFFREY S. BERMAN
United States Attorney.
