

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

:

SEALED INFORMATION

-v.-

:

19 CRIM ) 344

SALMAN RAMI HAIM,

:

Defendant.

:

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COUNT ONE  
(Conspiracy)

The United States Attorney charges:

1. From in or about 2001 through in or about 2016, in the Southern District of New York and elsewhere, SALMAN RAMI HAIM, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, violations of Title 26, United States Code, Section 7202.

2. It was a part and an object of the conspiracy that SALMAN RAMI HAIM, the defendant, and others known and unknown, being persons required under Title 26 to collect, account for, and pay over any tax imposed by Title 26, willfully and knowingly would and did fail to collect and truthfully account for and pay over such tax, to wit, at least approximately \$7,864,744 in payroll taxes, in violation of Title 26, United States Code, Section 7202.

3. The following overt act, among others, was committed and caused to be committed, in the Southern District of New York and elsewhere, by SALMAN RAMI HAIM, the defendant, and his co-conspirators in furtherance of the conspiracy and to effect its illegal object:

a. On or about May 29, 2012, HAIM assisted other individuals in opening bank accounts for nominee companies at a bank branch located in New York, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO  
(Tax Evasion)

The United States Attorney further charges:

4. From at least in or about 2009 through at least in or about 2017, in the District of New Jersey and elsewhere, SALMAN RAMI HAIM, the defendant, willfully and knowingly did attempt to evade and defeat a substantial part of the income tax due and owing by HAIM to the United States of America for the calendar years 2009 through 2016, by various means, including, among others, receiving income in cash and failing to report it to the Internal Revenue Service ("IRS"), paying personal expenses with unreported income, and preparing and causing to be prepared, signing and causing to be signed, and filing and causing to be filed with the

IRS, U.S., Individual Income Tax Returns, Forms 1040, which falsely and fraudulently omitted substantial amounts of income.

(Title 26, United States Code, Section 7201.)

COUNT THREE

(Conspiracy to Produce False Identification Documents)

The United States Attorney further charges:

5. Between in or about 1999 and in or about 2016, in the Southern District of New York and elsewhere, SALMAN RAMI HAIM, the defendant, and others known and unknown, unlawfully, willfully, knowingly did combine, conspire, and confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1028(a)(1).

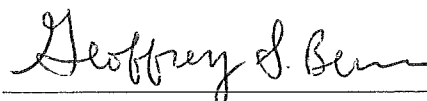
6. It was a part and object of the conspiracy that SALMAN RAMI HAIM, the defendant, together with others known and unknown, knowingly did produce, without lawful authority, in and affecting interstate commerce, one or more identification documents, authentication features, and false identification documents.

7. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt act, among others,

were committed and caused to be committed in the Southern District of New York and elsewhere:

a. In or about 2016, SALMAN RAMI HAIM, the defendant, signed invoices authorizing cash withdrawals from the company for which he worked to be used to procure false driver's licenses.

(Title 18, United States Code, Section 1028.)



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GEOFFREY S. BERMAN  
United States Attorney

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INFORMATION

19 Cr. ( )

(Title 18, United States Code, Sections  
371 and 1028; Title 26, United States  
Code, Section 7201)

GEOFFREY S. BERMAN

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United States Attorney.

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