

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **CRIMINAL DOCKET NO. 13-171**

v. * **SECTION: "R"**

ANIL C. PATEL *

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* * *

FACTUAL BASIS

If this case were to proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts:

Witnesses would testify that the defendant **ANIL C. PATEL** was the owner of the Trade Winds and La Village motels, which were located in Metairie, Louisiana. On or about August 6, 2009, in the Eastern District of Louisiana, the defendant **ANIL C. PATEL**, did willfully make and subscribe a 2008 United States Individual Income Tax Return, Form 1040 which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service (an agency of the United States Department of Treasury), which said income tax return defendant **ANIL C. PATEL** did not believe to be true and correct as to every material matter in that defendant **ANIL C. PATEL** did not report approximately \$426,744 of income.

During the calendar year 2008, **ANIL C. PATEL**, had and received taxable income in the amount of \$426,744 as opposed to the taxable income he stated on his return as a loss of \$39,306. The additional unreported taxable income resulted in an additional \$111,378 that was due and owing to the United States of America.

ANIL C. PATEL had previously filed tax returns in the past and knew of his responsibility to accurately report income. **ANIL C. PATEL** signed this 2008 tax return, under the penalty of perjury, knowing that it contained a false accounting of his taxable income for the 2008 tax year.

In summary, all of the evidence introduced at trial would establish the elements of the offenses charged in the indictment and prove the defendant's guilt beyond a reasonable doubt.

READ AND APPROVED:

ANIL C. PATEL DATE
Defendant

JON MAESTRI DATE
Assistant U.S. Attorney

TIMOTHY MECHE DATE
Counsel for Defendant