UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-

:

v. : 26 U.S.C. § 7206(2)

:

INDICTMENT

ALICIA JONES,

a/k/a "Alicia Jacobson"

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNTS 1-25

26 U.S.C. § 7206(2)

Aiding and Assisting in the Preparation of False Tax Returns

- 1. At all times relevant to this Indictment:
- (a) ALICIA JONES, a/k/a "Alicia Jacobson," the defendant (hereinafter JONES), owned and operated a tax preparation business named Rightchoice Financial & Insurance Services ("Rightchoice"), which maintained offices and conducted business in Irvington, New Jersey.
- (b) JONES's activities as owner of Rightchoice consisted of, among other things, the preparation and filing of U.S. Individual Income Tax Returns, Forms 1040, on behalf of her taxpayer clients.
- 2. At various times relevant to this Indictment, defendant JONES:
- (a) met with taxpayers at Rightchoice's office or communicated with taxpayers by facsimile to prepare their U.S. income tax returns;
 - (b) prepared false and fraudulent U.S. tax returns

for taxpayers by, among other things, fabricating and inflating Schedule A itemized deductions and education expenses, and including false taxpayer filing statuses, in order to obtain refunds for those taxpayers in amounts greater than those to which they were entitled;

- (c) presented those false and fraudulent tax returns to the Internal Revenue Service; and
- (d) received a fee for the preparation of tax returns for her clients.
- 3. On or about the dates listed below, in the District of New Jersey, and elsewhere, defendant,

ALICIA JONES, a/k/a "Alicia Jacobson,"

did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of federal income tax returns, Forms 1040, for the individuals and tax years identified below, which were false and fraudulent as to material matters, including those described below, knowing that the returns were false and fraudulent.

Count	Date of Offense (On or about)	Taxpayer (s)	Tax Year	Falsely Claimed Item(s)	Amount Claimed
1	March 5, 2009	N.L.	2008	Form 8863 - Qualified Education Expenses - line 1(c)	\$2,400

				Schedule A - Gifts by Cash or Check - line 16	\$2,156
				Schedule A - Gifts Other than by Cash or Check - line 17	\$4,500
2	March 29, 2010	N.L.	2009	Filing Status - Head of Household - line 4	
				Form 8863 - Qualified Education Expenses - line 1(c)	\$1,506
3	January 25, 2007	Т.В.	2006	Filing Status - Head of Household - line 4	
				Form 8863 - Qualified Education Expenses - line 1(c)	\$2,200
4	February 2, 2008	T.B.	2007	Filing Status - Head of Household - line 4	
				Form 8863 - Qualified Education Expenses - line 1(c)	\$2,200
5	February 18, 2009	T.B.	2008	Filing Status - Head of Household - line 4	

			_	Schedule A - Gifts by Cash or Check - line 16	\$3,950
				Schedule A - Gifts Other than by Cash or Check - line 17	\$6,500
				Form 8863 - Qualified Education Expenses - line 1(c)	\$2,400
				Schedule A - Unreimbursed Employee Expenses - line 21	\$9,669
6	31, 2010	2009	Filing Status - Head of Household - line 4		
			Form 8863 - Qualified Education Expenses - line 1(c)	\$1,986	
7			Form 8863 - Qualified Education Expenses - line 1(c)	\$2,200	
			Schedule A - Gifts by Cash or Check - line 15	\$2,000	
			Schedule A - Gifts Other than by Cash or Check - line 16	\$500	

				Schedule A - Unreimbursed Employee Expenses - line 20	\$8,187
8	January 24, 2008	J.M.	2007	Filing Status - Head of Household - line 4	
				Form 8917 - Qualified expenses - line 1(c)	\$3,250
				Schedule A - Gifts by Cash or Check - line 16	\$2,500
			Schedule A - Gifts Other than by Cash or Check - line 17	\$300	
				Schedule A - Unreimbursed Employee Expenses - line 21	\$14,754
9	January 22, 2009	J.M.	2008	Filing Status - Head of Household - line 4	
			Form 8863 - Qualified Education Expenses - line 1(c)	\$2,400	
				Schedule A - Gifts by Cash or Check - line 16	\$3,586
				Schedule A - Gifts Other than by Cash or Check - line 17	\$8,500

10	January J.M. 28, 2010	2009	Filing Status - Head of Household - line 4		
				Form 8863 - Qualified Education Expenses - line 1(c)	\$2,100
				Schedule A - Gifts by Cash or Check - line 16	\$1,896
				Schedule A - Gifts Other than by Cash or Check - line 17	\$500
11	February 5, 2007	J.Gu.	2006	Schedule A - Gifts by Cash or Check - line 15	\$3,200
				Schedule A - Gifts Other than by Cash or Check - line 16	\$500
				Schedule A - Unreimbursed Employee Expenses - line 20	\$7,261
				Form 1040 - Domestic Production Activities (Tuition) - line 35	\$4,000
12	February 13, 2008	J.Gu.	2007	Form 8917 - Qualified Education Expenses - line 1(c)	\$3,200

				Schedule A - Gifts by Cash or Check - line 16	\$1,500
				Schedule A - Gifts Other than by Cash or Check - line 17	\$500
				Schedule A - Unreimbursed Employee Expenses - line 21	\$4,550
13	March 2, 2008	J.D.	2007	Form 8863 - Qualified Education Expenses - line 1(c)	\$2,200
				Schedule A - Gifts Other than by Cash or Check - line 17	\$5,000
			Schedule A - Unreimbursed Employee Expenses - line 21	\$6,845	
14	14 March 20, J.D. 2009	2008	Form 8917 - Qualified Education Expenses - line 1(c)	\$4,000	
			Schedule A - Gifts by Cash or Check - line 16	\$2,633	
				Schedule A - Gifts Other than by Cash or Check - line 17	\$3,669

				Schedule A - Unreimbursed Employee Expenses - line 21	\$11,877
15	February 24, 2010	J.D.	2009	Form 8863 - Qualified Education Expenses - line 1(c)	\$3,000
				Schedule A - Gifts by Cash or Check - line 16	\$1,568
				Schedule A - Gifts Other than by Cash or Check - line 17	\$500
				Schedule A - Unreimbursed Employee Expenses - line 21	\$5,640
16	February T.U. 7, 2009	T.U.	2008	Schedule A - Gifts by Cash or Check - line 16	\$2,685
		·		Schedule A - Gifts Other than by Cash or Check - line 17	\$4,500
				Schedule A - Unreimbursed Employee Expenses - line 21	\$13,032
17	February 15, 2010	т. U.	2009	Schedule A - Gifts Other than by Cash or Check - line 17	\$500

				Schedule A - Unreimbursed Employee Expenses - line 21	\$8,830
19	January 27, 2008	J.Gi.	2007	Filing Status - Head of Household - line 4	
				Form 8863 - Qualified Education Expenses - line 1(c)	\$2,200
				Schedule A - Gifts by Cash or Check - line 16	\$2,560
				Schedule A - Gifts Other than by Cash or Check - line 17	\$4,000
				Schedule A - Unreimbursed Employee Expenses - line 21	\$4,105
20	January 16, 2009	J.Gi.	2008	Filing Status - Head of Household - line 4	
				Form 8863 - Qualified Education Expenses - line 1(c)	\$2,400
				Schedule A - Gifts Other than by Cash or Check - line 17	\$13,700

				Schedule A - Unreimbursed Employee Expenses - line 21	\$5,500
21	January 5, 2010	J.Gi.	2009	Filing Status - Head of Household - line 4	
				Form 8863 - Qualified Education Expenses - line 1(c)	\$3,500
22	April 11, 2007	H.S.	2006	Form 8863 - Qualified Education Expenses - line 1(c)	\$2,200
	·			Schedule A - Gifts by Cash or Check - line 15	\$1,000
				Schedule A - Gifts Other than by Cash or Check - line 16	\$500
				Schedule A - Unreimbursed Employee Expenses - line 20	\$6,475
23	March 17, 2008	H.S.	2007	Form 8917 - Qualified Education Expenses - line 1(c)	\$3,500
				Schedule A - Gifts by Cash or Check - line 16	\$2,530

				Schedule A - Gifts Other than by Cash or Check - line 17	\$3,560
				Schedule A - Unreimbursed Employee Expenses - line 21	\$6,084
24	February 25, 2009	H.S.	2008	Schedule A - Gifts by Cash or Check - line 16	\$3,000
			Schedule A - Gifts Other than by Cash or Check - line 17	\$3,000	
				Schedule A - Unreimbursed Employee Expenses - line 21	\$6,875
25	March 19, 2010	H.S.	2009	Schedule A - Gifts by Cash or Check - line 16	\$1,025
				Schedule A - Gifts Other than by Cash or Check - line 17	\$500
				Schedule A - Unreimbursed Employee Expenses - line 21	\$3,974

All in violation of Title 26, United States Code, Section 7206(2).

A TRUE BILL

FOREPERSON

PAUL J. FISHMAN

United States Attorney

United States District Court District of New Jersey

UNITED STATES OF AMERICA

v.

ALICIA JONES a/k/a "Alicia Jacobson"

INDICTMENT FOR

26 U.S.C. § 7206(2)

A True Bill,

Foreperson

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

BARBARA R. LLANES

ASSISTANT U.S. ATTORNEY
(973) 297-2051