2010R00127/JSP

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No 12-67 (FSH)
v.	:	26 U.S.C. § 7206(2)
PATRICIAH OMARI	:	**SUPERSEDING INFORMATION**

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Superseding Information:

   a. Defendant PATRICIAH OMARI was a resident of Middlesex County, New Jersey.

   b. The Department of the Treasury, Internal Revenue Service was an agency of the United States responsible for the processing of individual income tax returns and collecting income tax payable to the United States.

2. At all times relevant to this Superseding Information, another individual not charged as a defendant herein, prepared and filed at least one false United States Individual Income Tax Return, Form 1040, in the name of an individual with the initials V.K. for tax year 2009. The filed tax return included the following false information and documents:

   a. False address, which did not correspond with the actual address of V.K., the person whose name and social security number was used on the fraudulent return;

   b. False statement concerning income;

   c. False W-2 Form from an employer who did not employ V.K.;

d. False information about income tax purportedly withheld from income; and

e. False claim for a refund.

3. At all times relevant to this Superseding Information, the fraudulent tax return claimed a $72,859 tax refund. As a result of the filed tax form and claimed refund, the IRS processed the false return as if it were legitimate, and the IRS issued an actual refund in the amount of approximately $72,859.

4. In reality, V.K. was not entitled to the tax refund described in Paragraph 3 of this Information on V.K.'s 2009 U.S. Individual Income Tax Return, and V.K. did not authorize anyone to file a return on his/her behalf.

5. At all times relevant to this Superseding Information, defendant PATRICIAH OMARI provided the other individual with the routing number and bank account information of the Bank of America savings account held solely in the name of and under the custody and control of PATRICIAH OMARI. The bank information was provided on the false return, which caused the IRS to deposit the refund into the bank account of PATICIAH OMARI. The proceeds were thereafter withdrawn and wired to an account in Kenya.

6. From at least as early as in or about April 2010 through in or about June 2010, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

PATRICIAH OMARI

knowingly and willfully did aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of a 2009 U.S. Individual Income Tax Return, Form 1040, described in paragraph 2 of this Superseding Information, which was fraudulent and false as to material matters, as described in paragraph 2 of this Superseding Information, knowing that the return was false and fraudulent.

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

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 12-67 (FHS)

United States District Court
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UNITED STATES OF AMERICA

v.

PATRICIAH B. OMARI

SUPERSEDING INFORMATION FOR

26 U.S.C. § 7206(2)

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