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STEVEN M. LARIMORE
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S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

11-60166-CR-ALTONAGA/SIMONTON

CASE NO. _____
26 U.S.C. § 7201
26 U.S.C. § 7203

UNITED STATES OF AMERICA

v.

MURIEL AMANDA DAWSON, aka "Mandy"

Defendant.

Certified to be a true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By *Sandra Pineda* Deputy Clerk
Date 7-14-11

INDICTMENT

The grand jury charges that:

COUNT 1

Tax Evasion, 26 U.S.C. §7201

Tax Year 2004

During the calendar year 2004, MURIEL AMANDA DAWSON, aka "Mandy", a resident of Broward County in the Southern District of Florida, had and received taxable income in the sum of at least \$92,324. Upon that taxable income, there was owing to the United States of America an income tax of at least \$11,889. Well knowing and believing the foregoing facts, MURIEL AMANDA DAWSON, aka "Mandy", on or about August 15, 2005 in the Southern District of Florida, did willfully attempt to evade and defeat the income tax due and owing by her to the United States of America for the calendar year 2004 by failing to make an income tax return on or before

August 15, 2005 as required by law, to any proper officer of the Internal Revenue Service, by failing to pay to the Internal Revenue Service the income tax, and by concealing and attempting to conceal from all proper officers of the United States of America her true and correct income by directing payment of taxable income to a third party.

In violation of Title 26, United States Code, Section 7201.

COUNT 2

Tax Evasion, 26 U.S.C. §7201

Tax Year 2005

During the calendar year 2005, MURIEL AMANDA DAWSON, aka "Mandy", a resident of Broward County in the Southern District of Florida, had and received taxable income in the sum of at least \$102,896. Upon that taxable income, there was owing to the United States of America an income tax of at least \$12,966. Well knowing and believing the foregoing facts, MURIEL AMANDA DAWSON, aka "Mandy", on or about October 15, 2006 in the Southern District of Florida, did willfully attempt to evade and defeat the income tax due and owing by her to the United States of America for the calendar year 2005 by failing to make an income tax return on or before October 15, 2006 as required by law, to any proper officer of the Internal Revenue Service, by failing to pay to the Internal Revenue Service the income tax, and by concealing and attempting to conceal

from all proper officers of the United States of America her true and correct income by directing payment of taxable income to a third party.

In violation of Title 26, United States Code, Section 7201.

COUNT 3

Failure to File Tax Returns, 26 U.S.C. §7203

Tax Year 2006

During the calendar year 2006, MURIEL AMANDA DAWSON, aka "Mandy", a resident of Broward County in the Southern District of Florida, had and received gross income of at least \$30,732. By reason of such gross income, she was required by law, following the close of the calendar year 2006 and on or before April 15, 2007, to make an income tax return to the Internal Revenue Service Center, at Atlanta, Georgia, or to a person assigned to receive returns at the local office of the Internal Revenue Service at Ft. Lauderdale, Florida, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled. Well knowing and believing all of the foregoing, she did willfully fail, on or about April 15, 2007, in the Southern District of Florida and elsewhere, to make an income tax return.

In violation of Title 26, United States Code, Section 7203.

COUNT 4

Failure to File Tax Returns, 26 U.S.C. §7203

Tax Year 2007

During the calendar year 2007, MURIEL AMANDA DAWSON, aka "Mandy", a resident of Broward County in the Southern District of Florida, had and received gross income of at least \$31,740. By reason of such gross income, she was required by law, following the close of the calendar year 2007 and on or before April 15, 2008, to make an income tax return to the Internal Revenue Service Center, at Atlanta, Georgia, or to a person assigned to receive returns at the local office of the Internal Revenue Service at Ft. Lauderdale, Florida, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled. Well knowing and believing all of the foregoing, she did willfully fail, on or about April 15, 2008, in the Southern District of Florida and elsewhere, to make an income tax return.

In violation of Title 26, United States Code, Section 7203.

COUNT 5

Failure to File Tax Returns, 26 U.S.C. §7203

Tax Year 2008


During the calendar year 2008, MURIEL AMANDA DAWSON, aka "Mandy", a resident of Broward County in the Southern District of Florida, had and received gross income of at least \$45,104. By reason of such gross income, she was required by law, following the close of the calendar year 2008 and on or before April 15, 2009, to make an income tax return to the Internal Revenue Service Center, at Atlanta, Georgia, or to a person assigned to receive returns at the local

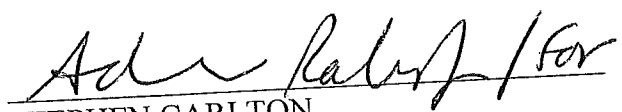
office of the Internal Revenue Service at Ft. Lauderdale, Florida, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled. Well knowing and believing all of the foregoing, she did willfully fail, on or about April 15, 2009, in the Southern District of Florida and elsewhere, to make an income tax return.

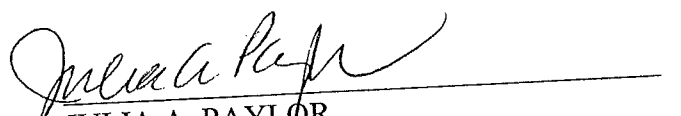
In violation of Title 26, United States Code, Section 7203.

A TRUE BILL.

~~FOREPERSON~~


WIFREDO A. FERRER
UNITED STATES ATTORNEY


STEPHEN CARLTON
ASSISTANT UNITED STATES ATTORNEY


JULIA A. PAYLOR
ASSISTANT UNITED STATES ATTORNEY