UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



BILL OF INFORMATION FOR FALSE STATEMENTS AND FILING FALSE TAX RETURNS

UNITED STATES OF AMERICA

CRIMINAL NO.

v.

SECTION:

JOHN M. NDANYI

* VIOLATION: 26 U.S.C. §7206(1)

* * *

The United States Attorney charges that:

COUNT ONE

MAKING FALSE STATEMENTS ON A TAX RETURN

On or about April 28, 2009, in the Eastern District of Louisiana, the defendant, **JOHN M. NDANYI**, a resident of Hammond, Louisiana, 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, which said income tax return defendant, **JOHN M. NDANYI**, did not believe to be true and

correct as to every material matter, in that defendant, JOHN M. NDANYI, did not report approximately \$105,817 of income; all in violation of Title 26, United States Code, Section 7206(1).

JIM LETTÆN

United States Attorney

Bar Roll No. 8517

JAN MASELLI MANN
First Assistant United States Attorney

Bar Roll No. 9020

Assistant United States Attorney

Illinois Bar Roll No. 6282956

New Orleans, Louisiana December 14, 2011