

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR PROHIBITION OF
ILLEGAL GAMBLING BUSINESS AND TAX EVASION**

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO.
v. * SECTION:
JOSEPH A. SCHILLACE, IV * VIOLATIONS: 18 U.S.C. § 1955
* 26 U.S.C. § 7201
* * *

The United States Attorney charges that:

COUNT 1
(Prohibition of Illegal Gambling Business)

From on or about January, 1999, and continuously thereafter up to and including April 7, 2011, in the Eastern District of Louisiana, the defendant, JOSEPH A. SCHILLACE, IV did conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, to wit: a gambling business involving sports betting, which gambling business was a violation of the laws of the State of Louisiana, to wit: La. R.S. 14:90, and which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of said illegal gambling

business, and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000.00 in any single day, all in violation of Title 18, United States Code, Section 1955.

COUNT 2
(Tax Evasion)

For the calendar year 2006, in the Eastern District of Louisiana, the defendant, JOSEPH A. SCHILLACE, IV, a resident of Madisonville, Louisiana, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of his income by intentionally preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent Form 1040, U.S. Individual Income Tax Return, on his behalf, which was filed with the Internal Revenue Service and which said return reported amounts of his taxable income and income taxes due and owing thereon which the defendant then and there well knew and believed

were substantially less than his actual taxable income and income taxes due and owing for the 2006 calendar year, as set forth below:

Year	Reported Taxable Income	Additional Taxable Income	Additional Taxes Owing
2006	\$ 0	\$246,705	\$ 66,690

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

NOTICE OF GAMBLING FORFEITURE

1. The allegations contained in Count 1 of this Bill of Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461(c) .

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1955, the defendant, JOSEPH A. SCHILLACE, IV, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense and, pursuant to Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461(c), any property, including money, used in violation of the offense including, but not limited to, the following:


- a. 2008 Infiniti, bearing Vehicle Identification Number: JNKCV64E78M113051;
- b. 2007 Chevrolet Tahoe, bearing Vehicle Identification Number: 1GNFCL3J47R162349; and
- c. 2005 Titan Pickup Truck, bearing Vehicle Identification Number: 1N6AA07A75N537858.

3. If any of the property described above, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



JIM LETTEN
United States Attorney
La. Bar. Roll No. 8517



JAN MASELLI MANN
Chief, Criminal Division
First Assistant United States Attorney
La. Bar Roll No. 9020



BRIAN P. MARCELLE
Assistant United States Attorney
La. Bar Roll No. 25156

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