

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

2016 AUG 22 A 11:19

Alexandria Division

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 ISAAC LANIER AVANT, )  
 )  
 Defendant. )

Criminal Case No: 1:16-MJ-385

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

**INTRODUCTORY ALLEGATIONS**

At all times relevant to this Information:

1. Defendant ISAAC LANIER AVANT ("AVANT") was a resident of Arlington, Virginia.
2. AVANT was a staff member employed by the U.S. House of Representatives since in or about 2002.
3. For tax years 2009 through 2013, AVANT earned wages of approximately \$170,000 per year.
4. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for enforcing and administering the tax laws of the United States and collecting taxes owed to the United States.

**STATUTORY ALLEGATIONS**

5. The allegations in paragraphs 1 to 4 are realleged in each Count of this Information as if fully set forth therein.

**COUNT ONE**  
**(Class A Misdemeanor)**  
**(Failure to File Individual Tax Return)**

6. During the calendar year 2009, AVANT, who was a resident of Arlington, Virginia, had and received gross income of at least \$18,700. By reason of such gross income, he was required by law, following the close of the calendar year 2009 and on or before October 15, 2010, to make an income tax return to any proper officer of the Internal Revenue Service, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing the foregoing, AVANT did willfully fail to timely make an income tax return.

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

**COUNT TWO**  
**(Class A Misdemeanor)**  
**(Failure to File Individual Tax Return)**

6. During the calendar year 2010, AVANT, who was a resident of Arlington, Virginia, had and received gross income of at least \$18,700. By reason of such gross income, he was required by law, following the close of the calendar year 2010 and on or before April 18, 2011, to make an income tax return to the Internal Revenue Service to any proper officer of the Internal Revenue Service, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing the foregoing, AVANT did willfully fail to timely make an income tax return.

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

**COUNT THREE**  
**(Class A Misdemeanor)**  
**(Failure to File Individual Tax Return)**

7. During the calendar year 2011, AVANT, who was a resident of Arlington, Virginia, had and received gross income of at least \$19,000. By reason of such gross income, he was required by law, following the close of the calendar year 2011 and on or before April 17, 2012, to make an income tax return to the Internal Revenue Service to any proper officer of the Internal Revenue Service, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing the foregoing, AVANT did willfully fail to timely make an income tax return.

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

**COUNT FOUR**  
**(Class A Misdemeanor)**  
(Failure to File Individual Tax Return)

7. During the calendar year 2012, AVANT, who was a resident of Arlington, Virginia, had and received gross income of at least \$9,750. By reason of such gross income, he was required by law, following the close of the calendar year 2012 and on or before April 17, 2013, to make an income tax return to any proper officer of the Internal Revenue Service, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing the foregoing, AVANT did willfully fail to timely make an income tax return.

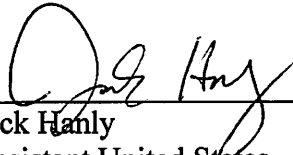
(In violation of Title 26, United States Code, Section 7203.)

**COUNT FIVE**  
**(Class A Misdemeanor)**  
**(Failure to File Individual Tax Return)**

7. During the calendar year 2013, AVANT, who was a resident of Arlington, Virginia, had and received gross income of at least \$10,000. By reason of such gross income, he was required by law, following the close of the calendar year 2012 and on or before April 15, 2014, to make an income tax return to any proper officer of the Internal Revenue Service, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing the foregoing, AVANT did willfully fail to timely make an income tax return.

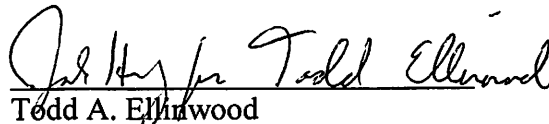
(In violation of Title 26, United States Code, Section 7203.)

Dana J. Boente  
United States Attorney



Jack Hanly  
Assistant United States  
2100 Jamieson Avenue  
Alexandria, VA 22314  
(703) XXX

Caroline D. Ciralo  
Acting Assistant Attorney General  
Department of Justice, Tax Division



Todd A. Ellwood  
Assistant Chief  
Department of Justice, Tax Division  
601 D Street, NW  
Washington, D.C. 20004  
(202)514-5145