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UNITED STATES DISTRICT COURT 2010 SEP 26 PM 5: 30 MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION CLERK, US 1 STRICT COURT MIDDLE DISTRICT COURT MIDDLE DISTRICT COURT MIDDLE DISTRICT COURT

UNITED STATES OF AMERICA

V.

AUGUSTIN DALUSMA

CASE NO. 2:18-cr- 159 - F+M-99CM 18 U.S.C. § 287 18 U.S.C. § 2 26 U.S.C. § 7206(I)

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH TWELVE (False Claims)

On or about the dates listed below, in the Middle District of Florida, and elsewhere, the defendant,

AUGUSTIN DALUSMA,

knowingly and intentionally made and presented, and caused to be made and presented, to the Internal Revenue Service, an agency of the United States

Department of the Treasury, claims against the United States for payment, which defendant knew to be false, fictitious, and fraudulent and which were based on false and fraudulent material facts, by preparing and causing to be prepared U.S. Individual Income Tax Returns, which requested refunds on behalf of the individuals named below in the amounts indicated below:

Count	APPROXIMATE DATE OF FILING	TAX YEAR	NAME ON RETURN	REFUND CLAIMED
ONE	February 1, 2014	2013	G.A.R.	\$9,716
TWO	February 4, 2014	2013	J.R.O.C.	\$5,790
THREE	February 5, 2014	2013	V.P.P.	\$5,112
FOUR	February 5, 2014	2013	V.M.R.	\$6,667
FIVE	February 8, 2014	2013	S.A.R.	\$6,794
SIX	February 8, 2014	2013	R.D.R.C.	\$6,743
SEVEN	February 8, 2014	2013	S.L.M.	\$7,268
EIGHT	February 12, 2014	2013	Y.M.N.	\$7,664
NINE	February 15, 2014	2013	W.C.P.	\$6,908
TEN	February 21, 2014	2013	W.S.S.	\$6,381
ELEVEN	February 12, 2015	2014	A.E.M.	\$8,143
TWELVE	February 17, 2015	2014	L.R.H.	\$4,508

All in violation of 18 U.S.C. §§ 287 and 2.

COUNT THIRTEEN (False Tax Return for 2012)

On or about June 6, 2013, in the Middle District of Florida, and elsewhere, the defendant,

AUGUSTIN DALUSMA,

willfully made and subscribed to a joint U.S. Individual Income Tax Return, Form 1040, for the calendar year 2012, 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 he did not believe to be true and correct as to every material matter in that the said return reported total income in the amount of \$63,150, whereas, as he then and there well knew and believed, he received income in addition to that heretofore stated.

In violation of 26 U.S.C. § 7206(1).

COUNT FOURTEEN (False Tax Return for 2013)

On or about April 15, 2014, in the Middle District of Florida, and elsewhere, the defendant,

AUGUSTIN DALUSMA,

willfully made and subscribed to a joint U.S. Individual Income Tax Return, Form 1040, for the calendar year 2013, 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 he did not believe to be true and correct as to every material matter in that the said return reported total income in the amount of \$70,823, whereas, as he then and there well knew and believed, he received income in addition to that heretofore stated.

In violation of 26 U.S.C. § 7206(1).

COUNT FIFTEEN (False Tax Return for 2014)

On or about February 17, 2015, in the Middle District of Florida, and elsewhere, the defendant,

AUGUSTIN DALUSMA,

willfully made and subscribed to a joint U.S. Individual Income Tax Return, Form 1040, for the calendar year 2014, 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 he did not believe to be true and correct as to every material matter in that the said return reported total income in the amount of \$76,187, whereas, as he then and there well knew and believed, he received income in addition to that heretofore stated.

In violation of 26 U.S.C. § 7206(1).

A TRUE BILL,

Muline Munoruh
Foreperson

MARIA CHAPA LOPEZ United States Attorney

By:

Simon R ETZ

Simon R. Eth

Assistant United States Attorney

Bv:

Jesus M. Casas

Assistant United States Attorney Chief, Fort Myers Division FORM OBD-34