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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
v.  
YOUSEF SHEMIRANI,  
Defendant.

Case No. 20CR1895-BAS

INFORMATION

26 U.S.C. § 7206(1) – Filing a False Tax Return

The United States Attorney charges:

On or about March 28, 2013, in the Southern District of California, defendant YOUSEF SHEMIRANI did willfully make and subscribe a 2012 U.S. Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was being signed subject to the penalties of perjury and which defendant caused to be filed with the Internal Revenue Service. Defendant did not believe that the return was true and correct as to every material matter in that defendant willfully and intentionally falsely reported to have made \$52,850 in charitable donations in 2012 when in fact, as defendant knew, these charitable donations were materially false and fraudulent in that 90% of the money he purportedly donated had been secretly returned to him.

All in violation of Title 26, United States Code, Section 7206(1).

ROBERT S. BREWER, JR.  
United States Attorney



EMILY W. ALLEN  
OLEKSANDRA JOHNSON  
ANDREW P. YOUNG  
Assistant U.S. Attorneys

DATED: 7/2/2020