

CR-13 0324

JMM:DMJ
F. #2012R00168

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

UNITED STATES OF AMERICA

AUG 26 2013

INFORMATION

- against -

LONG ISLAND OFFICE

Cr. No. _____
(T. 31, U.S.C., §§ 5314
and 5322(a); T. 26,
U.S.C., § 7206(1);
T. 18, U.S.C., §§ 3551
et seq.)

MOHANBHAI RAMCHANDANI,

Defendant.

- - - - - X

BIANCO, J.

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

LINDSAY, M

1. At all times relevant to this Information:

a. Pursuant to Title 31, Code of Federal Regulations, Sections 103.24, 103.27(c), 103.27(d) and 103.59(b), recodified at 31 C.F.R. 1010.350, citizens and residents of the United States who had a financial interest in, or signature authority over, a bank, securities and other financial account in a foreign country with an aggregate value of more than \$10,000 at any time during a particular year were required to file with the United States Department of the Treasury a Report of Foreign Bank and Financial Accounts on Form TD-F 90-22.1 (the "FBAR").

b. The FBAR for a given year was due on June 30 of the following year.

2. During the calendar year 2007, the defendant, MOHANBHAI RAMCHANDANI, a resident of Queens, New York, United States of America, had a financial interest in, and signature and other authority over, one or more financial accounts, having an aggregate value exceeding \$10,000, at the following: Bank of India, a bank in India and China; CIBC, a bank in Canada; National Bank of Canada, a bank in Canada; and Canara Bank, a bank in India.

COUNT ONE

(Willful Failure to File Report
of Foreign Bank and Financial Accounts)

3. The allegations in paragraphs one and two are realleged as if fully set forth in this paragraph.

4. On or before June 30, 2008, the defendant, MOHANBHAI RAMCHANDANI, a resident of the United States, did knowingly and willfully fail to file with the United States Department of the Treasury a Report of Foreign Financial Bank Accounts on Form TD-F 90-22.1, disclosing that he had a financial interest in, and signature and other authority over, a bank, securities and other financial account in a foreign county, to wit: a bank account at Bank of India in China, which account had an aggregate value of more than \$10,000 during the year 2007.

(Title 31, United States Code, Sections 5314 and
5322(a); Title 18, United States Code, Sections 3551 et seq.)

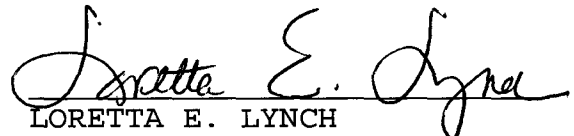
COUNTS TWO THROUGH FOUR
(Fraud and False Statements in Tax Returns)

5. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant MOHANBHAI RAMCHANDANI, a resident of Queens, New York, did willfully make and subscribe United States Individual Income Tax Returns, Forms 1040, for each of the calendar years set forth below, each of which was verified by a written declaration that it was made under penalties of perjury and which was filed with the Internal Revenue Service, which tax returns the defendant MOHANBHAI RAMCHANDANI did not believe to be true and correct as to every material matter, in that the returns omitted income that he earned in said calendar years upon which a substantial

tax was due and owing to the Internal Revenue Service for said calendar years:

COUNT	CALENDAR YEAR	UNREPORTED INCOME	APPROXIMATE TAX DUE AND OWING
TWO	2007	\$1,632,388	\$464,010
THREE	2008	\$507,536	\$171,935
FOUR	2009	\$948,349	\$100,057

(Title 26, United States Code, Section 7206(1); Title 18, United States Code, Sections 3551 et seq.)


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

SIR: Criminal Action No. _____

PLEASE TAKE NOTICE that the within will be presented for settlement and signature to the Clerk of the United States District Court in his office at the U.S. Courthouse, 610 Federal Plaza, Central Islip, New York, on the ___ day of _____, 20__, at 10:30 o'clock in the forenoon.

**UNITED STATES DISTRICT COURT
Eastern District of New York**

Dated: Central Islip, New York
_____, 20____

UNITED STATES OF AMERICA

- against-

United States Attorney,
Attorney for _____

MOHANBHAI RAMCHANDANI,

Defendant.

To: _____

Attorney for _____

INFORMATION

SIR:

PLEASE TAKE NOTICE that the within is a true copy of _____ duly entered herein on the ___ day of _____, in the office of the Clerk of the Eastern District of New York,

LORETTA E. LYNCH

United States Attorney
Eastern District of New York
United States Courthouse
610 Federal Plaza
Central Islip, New York 11722

Dated: Central Islip, New York
_____, 20____

United States Attorney,
Attorney for _____

Due Service of a copy of the within _____
_____ is hereby admitted.

Dated: _____, 20____

To: _____

Attorney for _____

Attorney for _____

Demetri M. Jones
Assistant U.S. Attorney (631)715-7840

RECEIVED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ **MAY 30 2013** ★
LONG ISLAND OFFICE