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LJW/DEH/SRD USAO# 2018R00181

MAY 8 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY DEPUTY

UNITED STATES OF AMERICA

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UNDER SEAL

v.

Criminal No. CCB-18-0276

DARRYL DE SOUSA,

(Failure to File a Federal Return,
26 U.S.C. § 7203)

Defendant

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INFORMATION

The United States Attorney for the District of Maryland charges:

COUNT 1

(Failure to File a 2013 U.S. Individual Income Tax Return)

During calendar year 2013, the defendant,

DARRYL DE SOUSA,

who was a resident of Baltimore, Maryland, had and received gross income of at least \$93,104. By reason of such gross income, he was required by law, following the close of calendar year 2013, and on or before April 15, 2014, to make an income tax return to the Internal Revenue Service Center, at Andover, Massachusetts, to a person assigned to receive returns at the local office of the Internal Revenue Service at Baltimore, Maryland, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing all of the foregoing, he did willfully fail, on or about April 15, 2014, in the District of Maryland and elsewhere, to make an income tax return.

In violation of 26 U.S.C. § 7203.

COUNT 2
(Failure to File a 2014 U.S. Individual Income Tax Return)

During calendar year 2014, the defendant,

DARRYL DE SOUSA,

who was a resident of Baltimore, Maryland, had and received gross income of at least \$101,985. By reason of such gross income, he was required by law, following the close of calendar year 2014, and on or before April 15, 2015, to make an income tax return to the Internal Revenue Service Center, at Andover, Massachusetts, to a person assigned to receive returns at the local office of the Internal Revenue Service at Baltimore, Maryland, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing all of the foregoing, he did willfully fail, on or about April 15, 2015, in the District of Maryland and elsewhere, to make an income tax return.

In violation of 26 U.S.C. § 7203.

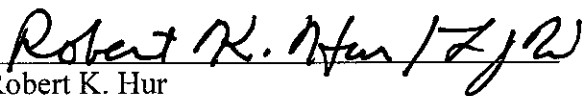
COUNT 3
(Failure to File a 2015 U.S. Individual Income Tax Return)

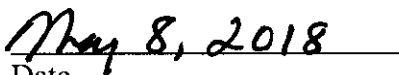
During calendar year 2015, the defendant,

DARRYL DE SOUSA,

who was a resident of Baltimore, Maryland, had and received gross income of at least \$127,089. By reason of such gross income, he was required by law, following the close of calendar year 2015, and on or before April 15, 2016, to make an income tax return to the Internal Revenue Service Center, at Andover, Massachusetts, to a person assigned to receive returns at the local office of the Internal Revenue Service at Baltimore, Maryland, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing all of the foregoing, he did willfully fail, on or about April 15, 2016, in the District of Maryland and elsewhere, to make an income tax return.

In violation of 26 U.S.C. § 7203.


Robert K. Hur
United States Attorney


Date