

ORIGINAL

FILED IN CHAMBERS
U.S.D.C. Atlanta

APR 08 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEN, Clerk
By  Deputy Clerk

UNITED STATES OF AMERICA	:	
	:	CRIMINAL INDICTMENT
v.	:	
	:	NO. 1 08 - CR - 132
JERRY ROBERT LAHR and	:	
JACQUELINE ANN DEMER	:	UNDER SEAL
a/k/a Jessica Dalton	:	

THE GRAND JURY CHARGES THAT:

COUNT ONE

CONSPIRACY

1. From in or about November 2001, the exact date being unknown to the Grand Jury, and continuing thereafter up to and including the date of this indictment, in the Northern District of Georgia and elsewhere, defendants JERRY ROBERT LAHR and JACQUELINE ANN DEMER, also known as Jessica Dalton, did knowingly and willfully conspire, combine, confederate, and agree, together and with each other and with other individuals both known and unknown to the Grand Jury, to defraud the United States of America by impeding, impairing, obstructing, and defeating the lawful government functions of the Internal Revenue Service ("IRS") of the United States Department of Treasury in the ascertainment, computation, assessment, and collection of the revenue, specifically, individual income taxes of JERRY ROBERT LAHR.

assessment and payment of said income tax by failing to make an income tax return on or before the dates listed in Column D, as required by law, to any proper officer of the IRS; by failing to pay to the IRS said income taxes; and by committing the following affirmative acts of evasion, the likely effect of which would be to mislead or conceal his true and correct income and taxes due thereon from proper officers of the United States of America: using nominee entities and nominee bank accounts to receive income, hold assets, and pay expenses; dealing in currency and other untraceable items; and removing funds from the United States and concealing these funds in foreign banks:

A	B	C	D
Count	Year	Gross Income	Date
3	2001	\$903,369.84	4-15-2002
4	2002	\$545,218.56	4-15-2002
5	2003	\$148,806.03	4-15-2003

All in violation of Title 26, United States Code, Section 7201.

COUNTS SIX THROUGH TEN

FICTITIOUS OBLIGATIONS

9. The allegations set forth in Paragraph 2A through 2M, as set forth in Count One, are incorporated herein by reference as if set forth in full below.

10. On or about the dates listed in Column B, in the Northern District of Georgia and elsewhere, the defendants JERRY ROBERT LAHR and JAQUELINE ANN DEMER, using the alias Jessica Dalton, with the intent to defraud the United States of America, did pass, utter, present, offer, and attempt and cause the same, to the United States Department of Treasury, IRS, as purported payment of tax debts owed by defendant JERRY ROBERT LAHR, false and fictitious instruments and other items appearing, representing, and purporting to be actual securities and other financial instruments issued under the authority of the United States, that is fictitious "Bond[s] to discharge attachment for debt," purporting to be issued under the authority of the United States Department of Treasury in the amounts listed in Column C for the purported payment of federal tax liability, penalties, and interest for the years listed in Column D:

A	B	C	D
Count	Date	Amount	Tax Year
6	10-03-2003	\$74,697.33	1996
7	10-03-2003	\$98,827.94	1997
8	10-03-2003	\$112,022.72	1998
9	10-03-2003	\$168,062.65	1999
10	10-03-2003	\$346,004.32	2000

All in violation of Title 18, United States Code, Sections
514(a)(2) and 2.

A TRUE BILL
Rhonda J. Mills
FOREPERSON

DAVID E. NAHMIAS
UNITED STATES ATTORNEY

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