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DISTRICT OF UTAH
BY: _____
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UN SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN LEE MOWER

Defendant.

FILED UNDER SEAL

Case: 1:19-cr-00101
Assigned To : Benson, Dee
Assign. Date : 10/11/2019
Description: SEALED v. SEALED

FELONY INFORMATION

COUNTS 1-5: 26 U.S.C. § 7206(1)
(Making and Subscribing a False Return)

The United States Attorney charges:

COUNT I
26 U.S.C. § 7206(1)
(Making and Subscribing a False Return)

On or about March 12, 2014, in the Northern Division of the District of Utah,

RYAN LEE MOWER,

defendant herein, a resident of Bountiful, Utah, did willfully make and subscribe a U.S.

Individual Income Tax Return, Form 1040, which was verified by a written declaration that

it was made under the penalties of perjury and which MOWER did not believe to be true

and correct as to every material matter. That U.S. Individual Income Tax Return, Form 1040, which was prepared and signed in the Central Division of the District of Utah and was electronically filed with the Internal Revenue Service, stated that MOWER's joint total adjusted gross income for the 2013 tax year was \$89,278, whereas, as he then knew and believed, he had received at least \$46,372.56 in additional income and used that money as personal income, all in violation of Title 26, United States Code, Section 7206(1).

COUNT II
26 U.S.C. § 7206(1)
(Making and Subscribing a False Return)

On or about March 22, 2015, in the Northern Division of the District of Utah,

RYAN LEE MOWER,

defendant herein, a resident of Bountiful, Utah, did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which MOWER did not believe to be true and correct as to every material matter. That U.S. Individual Income Tax Return, Form 1040, which was prepared and signed in the Central Division of the District of Utah and electronically filed with the Internal Revenue Service, stated that MOWER's total adjustable gross income for the 2014 tax year was \$96,869, whereas, as he then knew and believed, he had received at least \$116,088.04 in additional income and used that money as personal income, all in violation of Title 26, United States Code, Section 7206(1).

COUNT III

26 U.S.C. § 7206(1)

(Making and Subscribing a False Return)

On or about February 10, 2016, in the Northern Division of the District of Utah,

RYAN LEE MOWER,

defendant herein, a resident of Bountiful, Utah, did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which MOWER did not believe to be true and correct as to every material matter. That U.S. Individual Income Tax Return, Form 1040, which was prepared and signed in the Central Division of the District of Utah and electronically filed with the Internal Revenue Service, stated that MOWER's total adjustable gross income for the 2015 tax year was \$112,113, whereas, he then knew and believed, he had received at least \$223,088.64 in additional income and used that money as personal income, all in violation of Title 26, United States Code, Section 7206(1).

COUNT IV

26 U.S.C. § 7206(1)

(Making and Subscribing a False Return)

On or about April 11, 2017, in the Northern Division of the District of Utah,

RYAN LEE MOWER,

defendant herein, a resident of Bountiful, Utah, did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which MOWER did not believe to be true and correct as to every material matter. That U.S. Individual Income Tax Return, Form 1040, which was prepared and signed in the Central Division of the District of Utah and

electronically filed with the Internal Revenue Service, stated that MOWER's total adjustable gross income for the 2016 tax year was \$111,835, whereas, as he then knew and believed, he had received at least \$348,877.85 in additional income and used that money as personal income, all in violation of Title 26, United States Code, Section 7206(1).

COUNT V
26 U.S.C. § 7206(1)
(Making and Subscribing a False Return)

On or about March 10, 2018, in the Northern Division of the District of Utah,

RYAN LEE MOWER,

defendant herein, a resident of Bountiful, Utah, did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which MOWER did not believe to be true and correct as to every material matter. That U.S. Individual Income Tax Return, Form 1040, which was prepared and signed in the Central Division of the District of Utah and electronically filed with the Internal Revenue Service, stated that MOWER's total adjustable gross income for the 2017 tax year was \$114,104, whereas, as he then knew and believed, he had received at least \$178,850.00 in additional income and used that money as personal income, all in violation of Title 26, United States Code, Section 7206(1).

JOHN W. HUBER
United States Attorney



JAMIE Z. THOMAS
Assistant United States Attorney