

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Criminal No. 16-166 (RJL)
	:	
v.	:	Violations:
	:	
PATRICIA DRISCOLL,	:	26 U.S.C. § 7203
	:	(Willful Failure to Keep Records)
Defendant	:	
	:	

SUPERSEDING INFORMATION

The United States charges:

1. At all relevant times, defendant PATRICIA DRISCOLL was the President of the Armed Forces Foundation (AFF), a non-profit charitable organization founded to help military veterans and their families, and was also the owner of a for-profit limited liability company, Frontline Defense Systems, LLC (FDS). Both AFF and FDS operated out of the same address in Washington, D.C.

COUNT ONE

2. Paragraph 1 is incorporated herein.

3. During the calendar year 2013, defendant PATRICIA DRISCOLL, who was a resident of Maryland and person required under Title 26 of the United States Code and any regulations issued under the authority thereof to pay tax, to make a return, to keep any records, or to supply any information, willfully failed to keep such records, that is, on or about June 12, 2013, PATRICIA DRISCOLL made personal purchases from EBay using AFF's credit card to pay the \$512.84 of charges but willfully failed to keep records, by not ensuring that such amount was included in a list of personal charges on AFF's credit card to be repaid by offsetting loan or otherwise, all in violation of Title 26, United States Code, Section 7203.

COUNT TWO

4. Paragraph 1 is incorporated herein.

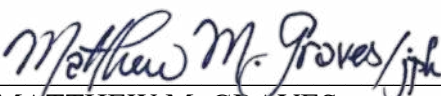
5. During the calendar year 2012, defendant PATRICIA DRISCOLL, who was a resident of Maryland and person required under Title 26 of the United States Code and any regulations issued under the authority thereof to pay tax, to make a return, to keep any records, or to supply any information, willfully failed to keep such records, that is, between at least January and August 2012, regarding charges totaling \$3,600 made to Driscoll's FDS credit card related to Driscoll's son's school, PATRICIA DRISCOLL failed to keep adequate records of the nature of those payments so that they would be treated properly on Schedule C of her 2012 tax return, all in violation of Title 26, United States Code, Section 7203.

COUNT THREE

6. Paragraph 1 is incorporated herein.

7. During the calendar year 2013, defendant PATRICIA DRISCOLL, who was a resident of Maryland and person required under Title 26 of the United States Code and any regulations issued under the authority thereof to pay tax, to make a return, to keep any records, or to supply any information, willfully failed to keep such records, that is, between at least October 18 and November 1, 2013, regarding about \$1,661.94 in FDS checks that paid an attorney who had performed mediation services related to Driscoll's child custody dispute with her ex-husband, PATRICIA DRISCOLL failed to keep adequate records of the nature of those payments so that they would be treated properly on Schedule C of her 2013 tax return, all in violation of Title 26, United States Code, Section 7203.

DATED: July 7, 2023


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