



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY CHATFIELD,

Defendant.

Criminal Case No. 10CR 4540

INFORMATION

Title 26, U.S.C. 7206(1) - Filing a False  
Income Tax Return

The United States Attorney charges, at all times material to this Information:

COUNT ONE

**Filing a False Tax Return - 26 U.S.C. § 7206(1)**

1. During the calendar years 2000 through 2008, defendant JEFFREY CHATFIELD was a resident of San Diego County, California, and a consultant advising private companies seeking to go public.

2. On or about October 20, 2004, in the Southern District of California and elsewhere, defendant JEFFREY CHATFIELD, did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, for tax year 2003, which was verified by a written declaration that the income tax return was made under penalties of perjury, and did file this income tax return with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that CHATFIELD: (a) on Line 22 (total income) of the Form 1040 failed to report income earned

1 from a bank account at UBS, AG, and (b) on Schedule B, Part II, line 7a of the Form 1040, reported  
2 that he did not have an interest in, or a signature or other authority over a financial account in a  
3 foreign country, whereas CHATFIELD then and there well knew and believed that he received  
4 income in addition to the total income reported, and had an interest in, and signature and other  
5 authority over, a financial account at UBS, AG in Switzerland.

6 All in violation of Title 26, United States Code, Section 7206(1).

7 DATED: November 10, 2010

8 Respectfully submitted,

9 LAURA E. DUFFY  
United States Attorney

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11 TIMOTHY J. STOCKWELL  
12 Special Assistant United States Attorney  
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