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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERTO CITTADINI,

Defendant.

CR09 0344 RSM

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

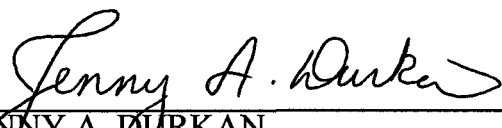
COUNT ONE
(Willfully Filing a False Tax Return)

On or about April 15, 2003, in the Western District of Washington and elsewhere, the defendant ROBERTO CITTADINI, a resident of Bellevue, Washington, did willfully make and subscribe a United States Individual Income Tax Return, IRS Form 1040 and accompanying schedules, for calendar year 2002, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, that he did not believe to be true and correct as to every material matter in that the tax return included false items, to wit: on Schedule B, Part III, line 7a of the 2002 tax return, defendant ROBERTO CITTADINI failed to report that he had an interest in or a signature or other authority over a financial account at UBS AG in Switzerland,

1 and on Line 22 of the Form 1040 of the 2002 tax return, defendant ROBERTO
2 CITTADINI failed to report income earned on his UBS AG Swiss bank accounts.

3 In violation of Title 26, United States Code, Section 7206(1).

4 DATED this 2nd day of October, 2009.

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7 JENNY A. DURKAN
UNITED STATES ATTORNEY

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10 MICHAEL J. WATLING
TRIAL ATTORNEY, TAX DIVISION

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12 
13 MATTHEW D. DIGGS
ASSISTANT UNITED STATES ATTORNEY