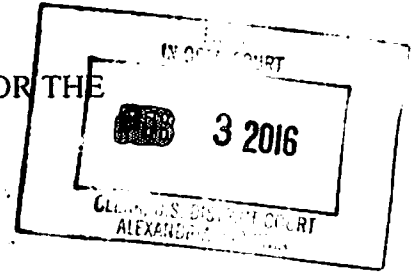


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 1:15CR362
)	
v.)	Count 1: 26 U.S.C. § 7206(1)
)	(Willfully Make and Subscribe a False Tax
)	Return))
ALBERT K. CAMBATA)	
)	Hon. Claude M. Hilton
Defendant.)	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT ONE
(Willfully Make and Subscribe a False Tax Return)**

At all times relevant to this information:

1. The defendant, ALBERT KERSHI CAMBATA, was a United States citizen from birth until September 14, 2012.
2. On or about October 23, 2006, the defendant established or caused to be established a Hong Kong corporate entity named Dragonflyer Ltd. ("Dragonflyer"), created by Swiss Banker 1 and Swiss Attorney 1.
3. On or about October 25, 2006, the defendant opened or caused to be opened an account at Swiss Bank 1 in Switzerland in the name of Dragonflyer ("the Swiss Financial Account"). On the financial account opening documents, Swiss Attorney 1 and another person are identified as the Directors and authorized signatories of Dragonflyer. On Swiss Bank 1's Form A, "Verification of the Beneficial Owner's Identity," the defendant is identified as the beneficial owner of the Dragonflyer account.

4. In 2006, the defendant received \$12 million from Hummingbird Holdings Ltd., a Belizean company. The \$12 million originated from a Panamanian aviation management company called Cambata Aviation, S.A., and ultimately was deposited to the Dragonflyer bank account at Swiss Bank 1 in November 2006.

5. Since 2007, the defendant has resided in Switzerland.

6. On or about April 3, 2008, the defendant signed a U.S. Individual Income Tax Return, IRS Form 1040, for tax year 2007. The defendant failed to report on his 2007 Form 1040 that he received gross taxable interest (not inclusive of bank fees) from his Swiss Financial Account of \$77,298.

7. In April 2008, the defendant caused Swiss Attorney 1 to request that Swiss Bank 1 send five million Euros from the Swiss Financial Account to an account he controlled at the Monaco branch of Swiss Bank 3 (“the Monaco Financial Account”).

8. In June 2008, the defendant closed his Swiss Financial Account with Swiss Bank 1 in the name of Dragonflyer and moved or caused to be moved funds to an account he controlled at the Singapore branch of Swiss Bank 2 (“the Singapore Financial Account”).

9. On or about March 31, 2009, the defendant electronically filed or caused to be electronically filed a U.S. Individual Income Tax Return, IRS Form 1040, for tax year 2008. The defendant failed to report on his 2008 Form 1040 that he received gross taxable interest (not inclusive of bank fees) from his Swiss Financial Account of \$206,408.

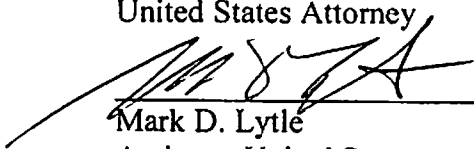
10. On or about September 14, 2012, the defendant went to the U.S. Embassy in Bratislava, Slovakia to renounce his United States citizenship. In the process of renouncing his United States citizenship, he informed the U.S. Department of State that he had acquired the nationality of St. Kitts and Nevis by virtue of naturalization.

11. On or about March 31, 2009, within the Eastern District of Virginia and elsewhere, the defendant did make and subscribe a 2008 Individual Income Tax Return, IRS Form 1040, which was verified by a written declaration that it was made under penalties of perjury and was filed with the IRS, which tax return he did not believe to be true and correct as to every material matter in that the tax return reported total income on line 22 in the amount of \$502,000 whereas, as he then and there well knew and believed, the income was substantially greater.

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

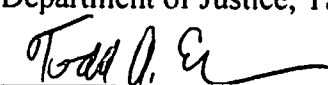
Respectfully submitted,

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