

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
 :  
 - v. - :  
 :  
STEPHAN FELLMANN, :  
 :  
 Defendant. :  
----- x

**SUPERSEDING**  
**INFORMATION**

S2 12 Cr. 962 (JPO)

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED AUG 13 2018

**COUNT ONE**  
**(Conspiracy)**

The United States Attorney charges:

1. From at least in or about 2008 up to and including in or about 2009, in the Southern District of New York and elsewhere, STEPHAN FELLMANN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, a violation of Title 26, United States Code, Section 7203.

2. It was a part and an object of the conspiracy that STEPHAN FELLMANN, the defendant, together with others known and unknown, including persons required to pay taxes, and persons required to make returns, keep records, and supply information, willfully and knowingly would and did fail to pay such taxes, make such returns, keep such records, and supply such information, at times required by law and regulations, to

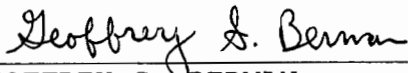
wit, FELLMANN agreed with U.S. taxpayer-clients to open and maintain bank accounts at Zürcher Kantonalbank ("ZKB") and conceal the existence of these bank accounts from the IRS by willfully failing to report them to the IRS as required.

Overt Acts

3. In furtherance of this conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about 2008, STEPHAN FELLMANN, the defendant, in his capacity as an employee of ZKB, opened a bank account at ZKB on behalf of a U.S. taxpayer-client, with the understanding that the taxpayer-client did not plan to disclose the existence of this account to the IRS as required.

(Title 18, United States Code, Section 371.)

  
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GEOFFREY S. BERMAN  
United States Attorney  
Southern District of New York

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

STEPHAN FELLMANN,

Defendant.

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(18 U.S.C. § 371.)

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GEOFFREY S. BERMAN  
United States Attorney.

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20 min

8/13/2018. Filed Misdemeanor Information .

Defendant present with attorney James Walden and Johnson Lin, AUSA Sarah Paul, Andrew Beaty, Noah Solowiejczyk present. German interpreter present. Court reporter present.

Defendant is sworn and the Court accepts the defendant's change of plea to Guilty as to count S2. The sentencing date is set for November 30, 2018 at 3:00 pm. The defendant's sentencing submission is due by November 16, 2018 and the Government's submission is due November 21, 2018. The PSR was ordered and bail is continued. (See transcript)

Oetken, J

