

2009R01053

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

LEONID ZALTSBERG

:
:
:
:
:

Hon.

Criminal No. 10-

437 (SRC)

26 U.S.C. § 7206(1)

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

Willful Subscription to a False Tax Return

26 U.S.C. § 7206(1)

1. At all times relevant to this Information, defendant Leonid Zaltsberg, a resident of Milltown, New Jersey, had a financial interest in, and signature and other authority over, at least one financial account, having an aggregate value exceeding \$10,000, at UBS AG, a bank in Switzerland.

2. On or about April 15, 2004, defendant Leonid Zaltsberg signed, filed, and caused to be filed with the Internal Revenue Service ("IRS") a United States Individual Income Tax Return, IRS Form 1040 for calendar year 2003.

3. The tax return was signed by defendant Leonid Zaltsberg and contained a written declaration that it was signed under the penalties of perjury.

4. The tax return was not true and correct as to every material matter in that the tax return included false items, to wit: (a) on Schedule B, Part III, line 7a of the 2003 tax return, defendant Leonid Zaltsberg failed to report that he had an interest in and signature and other authority over a financial account at UBS AG in Switzerland; and (b) on Line 22 of the Form 1040 of the 2003 tax return, defendant Leonid Zaltsberg under-reported his total income by omitting income earned on his UBS AG Swiss bank account.

5. On or about April 15, 2004, in the District of New Jersey, and elsewhere,
defendant

LEONID ZALTSBERG

did knowingly and willfully make and subscribe to a United States Individual Income Tax
Return, IRS Form 1040, as described in paragraphs 2 and 3, which he did not believe to be true
and correct as to every material matter, as described in paragraph 4.

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



PAUL J. FISHMAN
UNITED STATES ATTORNEY