

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : SUPERSEDING INFORMATION

-v.- : S1 11 Cr. 866 (LTS)

DANIELA CASADEI, :

Defendant. :

- - - - -x

COUNT ONE
(Conspiracy)

1. From at least in or about the 1990s through at least in or about 2010, in the Southern District of New York and elsewhere, DANIELA CASADEI, the defendant, together with others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other, to defraud the United States of America and an agency thereof, to wit, the Internal Revenue Service ("IRS"), and to commit offenses against the United States, to wit, violations of Title 26, United States Code, Section 7201, and Title 26, United States Code, Section 7206(1).

2. It was a part and an object of the conspiracy that DANIELA CASADEI, the defendant, together with others known and unknown, willfully and knowingly would and did defraud the United States of America and the IRS for the purpose of impeding, impairing, obstructing, and defeating the lawful

governmental functions of the IRS in the ascertainment, computation, assessment, and collection of revenue, to wit, federal income taxes.

3. It was further a part and an object of the conspiracy that DANIELA CASADEI, the defendant, together with others known and unknown, willfully and knowingly would and did attempt to evade and defeat a substantial part of the income tax due and owing to the United States of America from clients of CASADEI who were U.S. taxpayers, in violation of Title 26, United States Code, Section 7201.

4. It was further a part and an object of the conspiracy that DANIELA CASADEI, the defendant, together with others known and unknown, willfully and knowingly would and did make and subscribe returns, statements, and other documents, which contained and were verified by written declarations that they were made under the penalties of perjury, and which CASADEI, together with others known and unknown, did not believe to be true and correct as to every material matter, in violation of Title 26, United States Code, Section 7206(1).

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, DANIELA CASADEI, the defendant, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about the summer of 2008, CASADEI opened a new undeclared account for a U.S. taxpayer-client at a Swiss bank ("Swiss Bank No. 1") under the name "Conto Green-White-House."

b. In or about 2008, a U.S. lawyer based in Florida (the "U.S. Lawyer") sent CASADEI an email, which pertained to undeclared accounts that the U.S. Lawyer had opened for U.S. taxpayer-clients at Swiss Bank No. 1.

c. In or about June 2009, CASADEI advised a U.S. taxpayer-client that the client could maintain an undeclared account at Swiss Bank No. 1 if the client agreed to the formation of a corporate entity that would then become the account holder of the client's undeclared account at Swiss Bank No. 1.

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



PREET BHARARA
United States Attorney

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(18 U.S.C. § 371)

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United States Attorney.
