

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No.
) Violation: Title 26, United States Code,
CHRISTOPHER ZORICH) Section 7203
)

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

(a) Defendant CHRISTOPHER ZORICH was a professional football player for the Chicago Bears from 1991 through 1996 and the Washington Redskins during 1997. ZORICH graduated from the University of Notre Dame in 1991 and the University of Notre Dame Law School in 2002. ZORICH was employed by a Chicago law firm from 2002 through 2006, and by the University of Notre Dame from 2008 through 2010. He resided in the Northern District of Illinois.

(b) In 1993, ZORICH founded and served as the Executive Director of the not-for-profit Chris Zorich Foundation. The Foundation was funded through fundraisers and individual donors, and was intended to help disadvantaged families in the Chicago area and provide scholarships for disadvantaged students to attend the University of Notre Dame. The Foundation was required to file with the Internal Revenue Service on an annual basis Form 990, Return of Organization Exempt From Income Tax, accurately reporting all contributions, gifts, grants, and similar amounts received; direct expenses; and net assets or fund balances at the end of each tax year. In addition, the Foundation was required to file annual reports with the Illinois Attorney General's Office, Charitable Trusts Bureau, accurately reporting its fund-raising activities,

expenditures, and financial condition. As the Executive Director of the Foundation, it was ZORICH'S duty to ensure the tax returns and reports were timely and accurately filed with the IRS and the Attorney General's Office. The Foundation paid ZORICH rental income for use of property of approximately \$3,000 per month.

(c) In 2004, the Foundation's registration with the Attorney General's Office was cancelled after the Foundation failed to submit an annual report for calendar year 2002, which rendered the Foundation ineligible to solicit, receive, or hold funds in the State of Illinois. Nonetheless, the Foundation continued to receive contributions and make rental payments to ZORICH during the years 2006 through 2009.

(d) In tax years 2006 through 2009, the Foundation failed to file Form 990, Return of Organization Exempt From Income Tax, reporting the payment to ZORICH of rental income for use of property of approximately \$3,000 per month.

2. For the 2006 tax year, ZORICH received gross income of at least approximately \$331,625, including W-2 wage income of approximately \$137,466 from the Chicago Bears, W-2 wage income of approximately \$8,990 from a law firm where he was employed, and Schedule E rental income of approximately \$36,000 from the Foundation.

3. During the calendar year 2006, in the Northern District of Illinois, Eastern Division,

CHRISTOPHER ZORICH,

defendant herein, who was a resident of the Northern District of Illinois, had and received gross income totaling at least approximately \$331,625, and by reason of such income he was required by law, following the close of the calendar year of 2006, and on or before April 17, 2007, to make and file an income tax return to the District Director for the Internal Revenue Service of Chicago, at

Chicago in the Northern District of Illinois, Eastern Division, or to a Director of an Internal Revenue Service Center, stating specifically the items of his gross income and any deductions and credits to which he was entitled; and willfully did fail to make and file the required income tax return to the District Director, to a Director of an Internal Revenue Service Center, and any other proper officer of the United States;

In violation of Title 26, United States Code, Section 7203.

COUNT TWO

The UNITED STATES ATTORNEY further charges:

1. Paragraph one of Count One is incorporated here.
2. For the 2007 tax year, ZORICH received gross income of at least approximately \$70,996, including Schedule E rental income of approximately \$36,000 from the Foundation, and approximately \$25,250 of Schedule C income for appearance fees.
3. During the calendar year 2007, in the Northern District of Illinois, Eastern Division,

CHRISTOPHER ZORICH,

defendant herein, who was a resident of the Northern District of Illinois, had and received gross income of at least approximately \$70,996, and by reason of such income was required by law, following the close of the calendar year of 2007, and on or before April 17, 2008, to make and file an income tax return to the District Director for the Internal Revenue Service of Chicago, at Chicago in the Northern District of Illinois, Eastern Division, or to a Director of an Internal Revenue Service Center, stating specifically the items of his gross income and any deductions and credits to which he was entitled; and willfully did fail to make and file the required income tax return to the District Director, to a Director of an Internal Revenue Service Center, and any other proper officer of the United States;

In violation of Title 26, United States Code, Section 7203.

COUNT THREE

The UNITED STATES ATTORNEY further charges:

1. Paragraph one of Count One is incorporated here.
2. For the 2008 tax year, ZORICH received gross income of at least approximately \$372,448, including W-2 wage income of approximately \$274,933 from the Chicago Bears, W-2 wage income of approximately \$35,348 from the University of Notre Dame, and Schedule E rental income of approximately \$34,400 from the Foundation.

3. During the calendar year 2008, in the Northern District of Illinois, Eastern Division,

CHRISTOPHER ZORICH,

defendant herein, who was a resident of the Northern District of Illinois, had and received gross income of at least approximately \$372,448, and by reason of such income he was required by law, following the close of the calendar year of 2008, and on or before April 15, 2009, to make and file an income tax return to the District Director for the Internal Revenue Service of Chicago, at Chicago in the Northern District of Illinois, Eastern Division, or to a Director of an Internal Revenue Service Center, stating specifically the items of his gross income and any deductions and credits to which he was entitled; and willfully did fail to make and file the required income tax return to the District Director, to a Director of an Internal Revenue Service Center, and any other proper officer of the United States;

In violation of Title 26, United States Code, Section 7203.

COUNT FOUR

The UNITED STATES ATTORNEY further charges:

1. Paragraph one of Count One is incorporated here.
2. For the 2009 tax year, ZORICH received gross income of at least approximately \$242,298, including W-2 wage income of approximately \$137,466 from the Chicago Bears, W-2 wage income of approximately \$57,854 from the University of Notre Dame, and Schedule E rental income of approximately \$50,000 from the Foundation.

3. During the calendar year 2009, in the Northern District of Illinois, Eastern Division,

CHRISTOPHER ZORICH,

defendant herein, who was a resident of the Northern District of Illinois, had and received gross income of at least approximately \$242,298, and by reason of such income he was required by law, following the close of the calendar year of 2009, and on or before April 15, 2010, to make and file an income tax return to the District Director for the Internal Revenue Service of Chicago, at Chicago in the Northern District of Illinois, Eastern Division, or to a Director of an Internal Revenue Service Center, stating specifically the items of his gross income and any deductions and credits to which he was entitled; and willfully did fail to make and file the required income tax return to the District Director, to a Director of an Internal Revenue Service Center, and any other proper officer of the United States;

In violation of Title 26, United States Code, Section 7203.

UNITED STATES ATTORNEY