

United States District Court  
District of Connecticut  
FILED AT NEW HAVEN

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

11-8  
Roberta D. Tabora, Clerk  
By *[Signature]*  
Deputy Clerk  
2016  
3:16CR001 (JAM)

UNITED STATES OF AMERICA

CRIMINAL NO. 3:16CR001 (JAM)

v.

VIOLATIONS:

CHRISTIAN MEISSENN

18 U.S.C. Section 1349  
(Conspiracy to Commit Mail and Wire  
Fraud)

26 U.S.C. Section 7201  
(Tax Evasion)

INFORMATION

The United States Attorney charges:

COUNT ONE

(Conspiracy to Commit Mail and Wire Fraud)

1. From in or about January 2009 until in or about July 2016, in the District of Connecticut and elsewhere, the defendant, CHRISTIAN MEISSENN, willfully and knowingly did combine, conspire, confederate, and agree with others known to the United States Attorney to commit mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343.

2. The object and purpose of the conspiracy was for MEISSENN and his co-conspirators to enrich themselves by knowingly and willfully devising and intending to devise a scheme to defraud investors and to obtain money from these investors by means of materially false and fraudulent pretenses, representations, and promises, and to use the mails and interstate wires in execution of that scheme.

3. The manner and means by which MEISSENN and his co-conspirators executed the conspiracy and scheme to defraud included: (a) inducing investors to purchase securities by making false and misleading representations concerning the securities and the issuing companies; (b) causing the price of those securities to become falsely inflated; (c) causing to be sold the positions in those securities of conspirators and their designees at those falsely inflated prices, thereby enriching the members of the conspiracy; and (d) thereafter allowing the price of the securities to fall, leaving investors with worthless and unsalable stock.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO  
(Tax Evasion)

4. At all relevant times, MEISSENN was a resident of Suffield, Connecticut.

5. Substantially all of MEISSENN's income was the proceeds of criminal activity, namely the conspiracy to commit mail and wire fraud described in Count One of this Information.

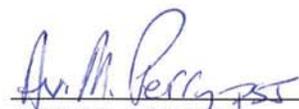
6. MEISSENN willfully attempted to evade federal income taxes he owed the United States of America for calendar year 2013 by, among other means, (a) diverting his share of the scheme's proceeds into the trust account of an attorney, rather than into a bank account in his own name; (b) directing the attorney to withdraw cash from the trust account for MEISSENN's personal use; (c) directing the attorney to wire funds and issue checks drawn on the trust account for the benefit of MEISSENN and various shell entities under the control of MEISSENN and his

family members; (d) falsely signing and submitting to the State of Connecticut Department of Banking a notarized affidavit on November 4, 2013, stating that he had a negative net worth and did not file taxes due to lack of income; and (e) failing to file with the Internal Revenue Service a U.S. Individual Income Tax Return, Form 1040, for calendar year 2013. As a result of these affirmative steps, MEISSENN reported no income and paid no federal income taxes in calendar year 2013. In fact, as MEISSENN then and there knew, in 2013 his total taxable income was approximately \$1,230,840, and he owed the United States of America approximately \$461,236 in federal income taxes.

All in violation of Title 26, United States Code, Section 7201.

UNITED STATES OF AMERICA

  
\_\_\_\_\_  
DEIRDRE M. DALY  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
AVI M. PERRY  
ASSISTANT UNITED STATES ATTORNEY

  
\_\_\_\_\_  
PETER S. JONGBLOED  
ASSISTANT UNITED STATES ATTORNEY