

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
-v- :
:
WAYNE FRANKLYN CHINN :
a/k/a "Frank Chinn," :
:
Defendant. :
:
----- x

INFORMATION

19 Cr. 915

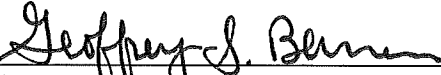
COUNT ONE
(Tax Evasion)

The United States Attorney charges:

1. From at least in or about 2001 through at least in or about January 2019, in the Southern District of New York and elsewhere, WAYNE FRANKLYN CHINN, a/k/a "Frank Chinn," the defendant, willfully and knowingly attempted to evade and defeat a substantial part of the income tax due and owing by CHINN to the United States of America for the calendar years 2001 through 2018 by various means, including, among others: (a) concealing more than \$5 million in undisclosed and untaxed income in offshore accounts at foreign banks, including Zürcher Kantonalbank and Privatbank IHAG, both based in Zurich, Switzerland; (b) utilizing nominee individuals, Liechtenstein and Panamanian foundations, and trusts to hold said offshore accounts for CHINN's benefit without disclosing the said accounts to U.S. authorities and paying income taxes on the income and assets thereon; and (c) with the help of

co-conspirators not named as defendants herein, routing CHINN's funds from undisclosed accounts at Privatbank IHAG through several nominee bank accounts outside of Switzerland, including accounts in Hong Kong, before returning the funds to IHAG in nominee accounts held in the name of a Singapore-based trust company purportedly on behalf of two foundations created by a co-conspirator as part of the scheme to continue to conceal CHINN's income and assets from U.S. authorities.

(Title 26, United States Code, Section 7201.)


GEOFFREY S. BERMAN
United States Attorney

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WAYNE FRANKLYN CHINN
a/k/a "Frank Chinn,"

Defendant.

INFORMATION

(26 U.S.C. § 7201)

GEOFFREY S. BERMAN
United States Attorney
