

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v- :

INFORMATION

STANLEY S. TOLLMAN, :

S7 02 Cr. 441 (LAP)

Defendant. :

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COUNT ONE
(Tax Evasion)

The United States Attorney charges:

Background

At all times relevant to this Information, unless otherwise indicated:

1. STANLEY S. TOLLMAN, the defendant, was a United States citizen who maintained residences at: 485 Park Avenue, New York, New York; 174 Via Del Lago, Palm Beach, Florida; and 95B Eaton Square, London, England.

2. In addition to their employment by, and affiliation with, a series of United States hotel and hospitality-related companies, including Tollman-Hundley Hotels, of Valhalla, New York, STANLEY S. TOLLMAN, the defendant, and his wife participated in the operation and management of a series of Bermuda-based travel and hotel companies, including The Travel Corporation, Trafalgar Tours International, and the Red Carnation

Group of hotels.

3. In or about the late 1980s and early 1990s, STANLEY S. TOLLMAN, the defendant, and his wife caused to be opened a series of bank accounts at financial institutions in Guernsey, the Channel Islands. Those accounts were maintained by accountants, located in Guernsey and elsewhere, who took direction concerning the accounts from, among others, STANLEY TOLLMAN and his wife, who controlled and shared in the beneficial ownership of the accounts.

4. STANLEY S. TOLLMAN and his wife opened, maintained, and controlled certain of the Guernsey accounts in their own names, and the income STANLEY S. TOLLMAN and his wife received through these accounts was largely reported to the Internal Revenue Service ("IRS") on their U.S. Individual Income Tax Returns. Two of the accounts, however, were opened and maintained in the names of corporations, to wit, Buffalo Holdings and New York Investments, and virtually all of the income received through these corporate accounts was not reported to the IRS by STANLEY S. TOLLMAN and his wife.

5. During the tax years 1994 through 1999, STANLEY S. TOLLMAN and his wife received, through the Guernsey corporate bank accounts referred to in Paragraph 4 above, more than \$18,000,000 in income paid to them by or through the Travel Corporation (or one of its subsidiaries), which income they willfully failed to report on their U.S. Individual Income Tax Returns.

Statutory Allegations

6. From on or about January 1, 1994 through on or about October 15, 2000, in the Southern District of New York and elsewhere, STANLEY S. TOLLMAN, the defendant, unlawfully, wilfully and knowingly did attempt to evade and defeat a substantial part of the income tax due and owing by STANLEY S. TOLLMAN and his wife to the United States of America for the tax years 1994 through 1999, by various means, including, among others: (a) maintaining certain corporate bank accounts at financial institutions in Guernsey; (b) causing millions of dollars of income paid to STANLEY S. TOLLMAN and his wife to be deposited into these Guernsey accounts; (c) failing to report to his United States-based tax preparers the income he and his wife received from various sources, including the income referred to in affirmative act (b), interest thereon, and other income; and (d) preparing and causing to be prepared, signing and causing to be signed, and filing and causing to be filed with the IRS, false and fraudulent U.S. Individual Income Tax Returns, Forms 1040, for the calendar years 1994 through 1999, which returns fraudulently omitted the aforementioned income and thereby substantially understated STANLEY S. TOLLMAN's total income, taxable income, and tax due and owing for the 1994-1999 tax

years.

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

Michael J. Garcia

MICHAEL J. GARCIA
United States Attorney