ROBERT S. MUELLER, III (CSBN 59775)
United States Attorney

Attorney for Plaintiff

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TAX DIVISION

IN THE UNITED STATES DISTRICT COURT FOR THE

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. RANDOLPH GEORGE, Defendant.	CRIMINAL NO. VIOLATIONS: 26 U.S.C. § 7206(1) -- Making and Subscribing False Returns; 26 U.S.C. § 7203 -- Willful Failure To File Return SAN FRANCISCO VENUE

INDICTMENT

COUNT ONE: (26 U.S.C. § 7206(1))

The Grand Jury charges:

On or about October 12, 1995, in the Northern District of California, the defendant

RANDOLPH GEORGE,

then a resident of San Francisco, California, did willfully make and subscribe an U.S. Individual Income Tax Return, for the calendar year 1991, which was filed with the Internal Revenue Service and verified by the defendant in a written declaration that it was made under the penalty of perjury, which he knew to be materially false in that said return reported gross receipts from his business in the amount of $20,000, when, in fact, he had gross receipts from his business for the calendar year 1991 in excess of $20,000.

In violation of Title 26, United States Code, Section 7206(1).

COUNT TWO: (26 U.S.C. § 7206(1))

On or about the October 12, 1995, in the Northern District of California, the defendant

RANDOLPH GEORGE,

then a resident of San Francisco, California, did willfully make and subscribe an U.S. Individual Income Tax Return, for the calendar year 1992, which was filed with the Internal Revenue Service and verified by the defendant in a written declaration that it was made under the penalty of perjury, which he knew to be materially false in that said return reported gross receipts from his business in the amount of $63,723, when, in fact, he had gross receipts from his business for the calendar year 1992 in excess of $63,723.

In violation of Title 26, United States Code, Section 7206(1).

COUNT THREE: (26 U.S.C. § 7203)

During the calendar year 1993, in the Northern District of California, the defendant

RANDOLPH GEORGE,

who was then a resident of San Francisco, California, had and received a gross income of $134,658.26; that by reason of such income he was required by law, following the close of the calendar year 1993 and on or before April 15, 1994, to make an income tax return to the District Director of Internal Revenue for the Internal Revenue District of San Francisco, at San Francisco, in the Northern District of California, or to the Director, Internal Revenue Service Center, Western Region, at Fresno, California, stating specifically the items of his gross income and any deductions and credits to which he was entitled; that knowing all of the foregoing, he willfully and knowingly failed to make an income tax return to the District Director of Internal Revenue, or to any other proper officer of the United States.

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

A TRUE BILL

DATED: _____

_____
FOREPERSON

ROBERT S. MUELLER, III
United States Attorney

DAVID W. SHAPIRO
Chief, Criminal Division

(Approved as to form:)
AUSA DENIER