ROBERT S. MUELLER, III (California State Bar No. 59775)
United States Attorney

Attorney for Plaintiff

FILED
01 APR -2 PM 3:47
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT FOR THE

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. ZAIN I. ALI, Defendant.	Criminal No.: CR 01-20025 SBA VIOLATIONS: 26 U.S.C. § 7201 Income Tax Evasion OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (26 U.S.C. § 7201 - Income Tax Evasion)

On or about April 17, 1995, in the Northern District of California, the defendant

ZAIN I. ALI,

then a resident of Newark, California, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the calendar year 1994, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service, wherein he stated that his taxable income for said calendar year was the sum of <$371.00>, and that the amount of tax due and owing thereon was the sum of $ -0-, whereas, as he then and there well knew

and believed, his taxable income for said calendar year was the sum of $78,743.92, upon which said taxable income there was owing to the United States of America an income tax of $17,316.00, in violation of Title 26, United States Code, Section 7201.

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COUNT TWO: (26 U.S.C. § 7201 - Income Tax Evasion)

On or about April 15, 1996, in the Northern District of California, the defendant

ZAIN I. ALI,

then a resident of Newark, California, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the calendar year 1995, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service, wherein he stated that his taxable income for said calendar year was the sum of <$495.00>, and that the amount of tax due and owing thereon was the sum of $ -0-, whereas, as he then and there well knew and believed, his taxable income for said calendar year was the sum of $110,370.72, upon which said taxable income there was owing to the United States of America an income tax of $26,601.00, in violation of Title 26, United States Code, Section 7201.

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COUNT THREE (26 U.S.C. § 7201 - Income Tax Evasion)

That during the calendar year 1996, the defendant

ZAIN I. ALI,

then a resident of Newark, California, had and received taxable income in the sum of $196,267.99 by the issuance of 40 false checks to himself from the bank account of his employer, Vic/Tal Sales, each of which he endorsed with the president's signature stamp, and which he concealed from his employer by the fabrication of false invoices which he entered into the accounts payable system of Vic/Tal Sales and which he further concealed from his employer by the removal of the fraudulent checks from the bank statements each month when they were delivered to Vic/Tal Sales; that upon said taxable income there was owing to the United States of America an income tax of $55,151.47; that well knowing and believing the foregoing facts, ZAIN I. ALI, on or about April 15, 1997, in the Northern District of California, did willfully attempt to evade and defeat the said income tax due and owing by him to the United States of America for said calendar year 1996 by failing to make an income tax return on or about April 15, 1997, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service said income tax, in violation of Title 26, United States Code, Section 7201.

DATED: April 2, 2001

A TRUE BILL.

FOREPERSON

ROBERT S. MUELLER, III
United States Attorney

DAVID W. SHAPIRO
Chief, Criminal Division

(Approved as to form: AUSA DENIER)