

1 JOSEPH P. RUSSONIELLO (CABN 44332)  
2 United States Attorney

FILED  
09 APR -3 AM 9:50  
RICHARD  
CLERK U.S.  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 CR 09  
13 No.

0350

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ALEXANDER JAMES TRABULSE,

17 Defendant.

VIOLATION:

18 18 U.S.C. § 1341 (Mail Fraud).

**JSW**

19 SAN FRANCISCO VENUE

20 INFORMATION

21 The United States Attorney charges:

22 1. At all relevant times, ALEXANDER JAMES TRABULSE resided in Daly City,  
23 California.

24 2. Between in or about 1997 and 2007, ALEXANDER JAMES TRABULSE managed  
25 so-called hedge funds known as Fahey Hedge Fund and Fahey Financial Group, Inc. located in  
26 San Francisco, California (collectively the "Fahey Funds").

27 3. By in or about 2006, ALEXANDER JAMES TRABULSE persuaded approximately  
28 165 investors to invest a total net principal amount of approximately \$17.6 million.

INFORMATION

1 4. ALEXANDER JAMES TRABULSE misled investors into believing their  
2 investments in the Fahey Funds were worth a total of approximately \$50 million.

3 5. ALEXANDER JAMES TRABULSE misled investors by mailing fraudulent  
4 periodic account statements that made materially false representations about the true disposition  
5 of their funds and the value of the assets held by the Fahey Funds using the mail.

6 6. ALEXANDER JAMES TRABULSE further misled investors about how Fahey  
7 Funds would manage the money they invested. Instead, ALEXANDER JAMES TRABULSE  
8 stole or otherwise diverted millions of dollars in investor money for the defendant's own  
9 personal benefit or the benefit of others related to the defendant.

10 7. Investors in the Fahey Funds have lost millions of dollars as a result of the  
11 defendant's scheme to defraud.

12  
13 COUNT ONE: 18 U.S.C. § 1341 (Mail Fraud)

14 8. Paragraphs 1 through 7 are realleged as if fully set forth herein.

15 9. From in or about 1997 through in or about 2007, in the Northern District of  
16 California and elsewhere, the defendant

17 ALEXANDER JAMES TRABULSE,

18 having devised and intending to devise a scheme and artifice to defraud, and for obtaining money  
19 and property by means of false and fraudulent pretenses, representations, and promises, and to  
20 sell, dispose of, loan, exchange, alter, give away, distribute, supply, and furnish and procure for  
21 unlawful use counterfeit and spurious coins, obligations, securities, and other articles, and having  
22 represented and intimated and held out things to be such counterfeit and spurious articles, for the  
23 purpose of executing such scheme and artifice and attempting so to do, placed in a post office  
24 and authorized depository for mail matter, documents and other matter and things to be sent and  
25 delivered by the Postal Service, and deposited and caused to be deposited documents and other  
26 matters and things to be sent and delivered by private and commercial interstate carrier, and took  
27 and received therefrom, documents and other matter and things, and knowingly caused to be

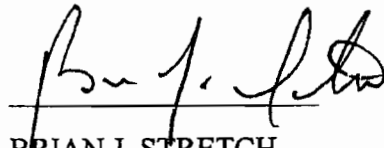
28 INFORMATION

1 delivered by mail and such carrier according to the direction thereon, and at the place at which it  
2 was directed to be delivered by the person to whom it was addressed, documents and other matter  
3 and things, in violation of Title 18, United States Code, Section 1341.

4 All in violation of Title 18, United States Code, Section 1341.

5  
6 DATED: April 3, 2009

7 JOSEPH P. RUSSONIELLO  
8 United States Attorney

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11 BRIAN J. STRETCH  
12 Chief, Criminal Division

13 Approved as to form:

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16 ADAM A. REEVES  
17 Assistant United States Attorney

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28 INFORMATION

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING

**OFFENSE CHARGED**

**VIOLATION:**

18 U.S.C. § 1341 (Mail Fraud)

- Petty
- Minor
- Misdemeanor
- Felony

**PENALTY:**

20 years imprisonment (Class c: 18 U.S.C. § 3581(b)(3))  
\$250,000 fine (18 U.S.C. § 3571(b)(3))  
3 years supervised release (18 U.S.C. § 3583(b)(2))  
\$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

Name of District Court and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

ALEXANDER JAMES TRABULSE

DISTRICT COURT NUMBER

CR 09

0350

JSW

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY  DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

09-3-70004 MAG

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) ADAM A. REEVES

This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

Arraignment  Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: