

ORIGINAL
FILED

03 MAR -3 PM 1:12

WILLIAM L. WILKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 KEVIN V. RYAN
2 United States Attorney
3 Attorney for Plaintiff
4
5
6
7

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

12 UNITED STATES OF AMERICA,)
13)

14 Plaintiff,)

15 v.)

16 SANDRA MASCARENHAS,)

17 Defendant.)

Criminal No. CR-01-0129-MMC

VIOLATIONS: 26 U.S.C. § 7212(A) -
Obstruction of the Due Administration of
the Internal Revenue Laws

SAN FRANCISCO VENUE

18 SUPERSEDING INFORMATION
19

20 The United States Attorney charges:

21 COUNT ONE: (26 U.S.C. § 7212(a))

22 That beginning on or about April 17, 1998, in the Northern District of California, the
23 defendant

24 SANDRA MASCARENHAS

25 a resident of Menlo Park, California, did corruptly endeavor to obstruct or impede the due
26 administration of the internal revenue laws by: (1) Forging the signature of her husband, David
27 Gainer, on their joint U.S. Individual Income Tax Return, Form 1040, for the calendar year 1995;
28 and (2) filing with the Internal Revenue Service the false and fraudulent joint U.S. Individual

SUPERSEDING INFORMATION
CR-01-0129 MMC

1 Income Tax Return for the calendar year 1995, which was verified by a written declaration that it
2 was made under the penalties of perjury, which income tax return the defendant did not believe
3 to be true and correct as to every material matter in that the defendant thereon forged the
4 signature of her husband, David Gainer.

5 In violation of Title 26, United States Code, Section 7212(a).

6

7

KEVIN V. RYAN
United States Attorney

8

9

Charles B. Burch 2/27/03

10

CHARLES B. BURCH
Chief, Criminal Division

11

12

13

Approved as to Form:

[Signature]
(AUSA Kingston)

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

SUPERSEDING INFORMATION
CR-01-0129 MMC