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

8 IN THE UNITED STATES DISTRICT COURT FOR THE  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 ZAIN I. ALI,

15 Defendant.  
16

Criminal No.:

CR

01-40040 SBA

VIOLATIONS: 26 U.S.C. § 7201  
Income Tax Evasion

OAKLAND VENUE

17 INDICTMENT

18 The Grand Jury charges:

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

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

21 ZAIN I. ALI,

22 then a resident of Newark, California, did willfully attempt to evade and defeat a large part of the  
23 income tax due and owing by him to the United States of America for the calendar year 1994, by  
24 preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent  
25 U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service,  
26 wherein he stated that his taxable income for said calendar year was the sum of <\$371.00>, and that the  
27 amount of tax due and owing thereon was the sum of \$ -0-, whereas, as he then and there well knew  
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1 and believed, his taxable income for said calendar year was the sum of \$78,743.92, upon which said  
2 taxable income there was owing to the United States of America an income tax of \$17,316.00, in  
3 violation of Title 26, United States Code, Section 7201.

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

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

3 ZAIN I. ALI,

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

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

2 That during the calendar year 1996, the defendant


3 ZAIN I. ALI,

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

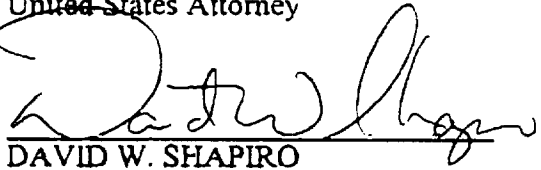
17  
18 DATED:

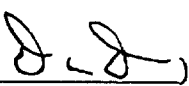
A TRUE BILL.

19 *April 2, 2001*

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FOREPERSON

21 ROBERT S. MUELLER, III  
22 United States Attorney

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24 DAVID W. SHAPIRO  
25 Chief, Criminal Division

26 (Approved as to form: )  
27 AUSA DENIER  
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INDICTMENT