

1 KEVIN V. RYAN (CSBN 118321)
2 United States Attorney

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SANDRA LEE ROSS,

15 Defendant.

CRO 2

Criminal No.

0359

VIOLATIONS:

18 U.S.C. § 1956(a)(3)(A) - Money
Laundering; 26 U.S.C. § 7203 - Failure to
File Return; 18 U.S.C. § 982(a)(1) -
Criminal Forfeiture

MMC

SAN FRANCISCO VENUE

17 INDICTMENT

18 The Grand Jury charges:

19 COUNT ONE: (18 U.S.C. § 1956(a)(3)(A) - Money Laundering)

20 On or about and between November 3, 1999, and November 30, 1999, both dates being
21 approximate and inclusive, in the Northern District of California, the defendant

22 SANDRA LEE ROSS

23 did knowingly conduct and attempt to conduct a financial transaction affecting interstate
24 commerce, to wit: the sale of an electric generator, which involved property, United States
25 currency totaling \$25,300, represented by a law enforcement officer to be the proceeds of a
26 specified unlawful activity, to wit: the manufacture and/or distribution of marijuana, with the
27 intent to promote the carrying on of the specified unlawful activity, to wit: the manufacture
28

INDICTMENT

1 and/or distribution of marijuana; in violation of Title 18, United States Code, Section
2 1956(a)(3)(A).

3 COUNTS TWO THROUGH TWENTY-NINE: (26 U.S.C. § 7203 - Failure to File Return)

4 During the calendar years 1999 and 2000, in the Northern District of California, the
5 defendant

6 SANDRA LEE ROSS

7 was the owner of a business located at 1150 Evergreen Road, Suite 7, Redway, California, under
8 the name and style of G.P.S., also known as Generators-Parts-Service, and was engaged in the
9 trade or business of selling electric generators and related equipment.

10 On or about the dates reflected below, the defendant Sandra Lee Ross, in connection with
11 twenty-eight transactions relating to the sale of electric generators and/or related equipment,
12 received cash aggregating in excess of \$10,000 for each such transaction or two or more related
13 transactions as payment for an electric generator and/or related equipment, from individuals who
14 were identified in the books and records of G.P.S. as the names appearing in the chart below.

15 By virtue of the receipt of cash in excess of \$10,000 for each such transaction, the
16 defendant Sandra Lee Ross was required by law, pursuant to Title 26, United States Codes
17 Section 6050I, and Treas. Reg. 1.6050I-1 (26 C.F.R.), to file with the Internal Revenue Service,
18 Detroit Computing Center, at Detroit, Michigan, in the Eastern District of Michigan, or to hand
19 carry to her local Internal Revenue Service Office located in the Northern District of California, a
20 return within 15 days after receiving an initial payment that exceeded \$10,000, or, if the initial
21 payment did not exceed \$10,000, within 15 days after receiving a payment that caused the
22 aggregate amount to exceed \$10,000, on IRS Form 8300, Report of Cash Payment Over \$10,000
23 Received in a Trade of Business, in the manner and form stated thereon, stating, among other
24 things, the name, address, and taxpayer identification number of the person from whom she
25 received the cash, the amount of the cash received, and the date and nature of the transaction.

26 The following is a list of the names of individuals as identified in the books and records
27 of G.P.S. from whom the cash was received with respect to the sales transaction of each electric
28 generator and/or related equipment, and the approximate dates upon which the cash was received

1 for each such transaction or two or more related transactions that caused the aggregate amount of
2 cash received to exceed \$10,000:

Count	Name of Individual from Whom Cash Received	Date Cash Received
2	David Goodman	11/02/1999
3	Steve Lewis	11/09/1999
4	Jeff Longmire	11/12/1999
5	Larry Johnson	12/06/1999
6	Arthur Tittle	12/08/1999
7	Bob Jones	12/22/1999
8	Ron Eberhardt	12/10/1999
9	George Murphy	01/18/2000
10	Mike Jensen	02/25/2000
11	James Sherman	01/26/2000
12	Stan Stroud	01/26/2000
13	Joe Weber	01/13/2000
14	Don Lee	01/25/2000
15	Danny Jackson	02/14/2000
16	Frank Moroni	02/25/2000
17	Freddie McNichols	01/27/2000
18	Ian Kohen	01/28/2000
19	Lee McDonald	02/22/2000
20	Dave Rashall	03/27/2000
21	Sam Anderson	03/17/2000
22	Isaac Reed	03/21/2000
23	Jack Thomas	04/11/2000
24	Fred Byers	04/28/2000
25	Frank Gilmore	05/03/2000
26	Doug Litty	06/02/2000
27	John Sena	06/07/2000
28	Doug Horner	06/15/2000
29	Mike Mitchell	06/20/2000

1 Well knowing all of the foregoing facts, defendant SANDRA LEE ROSS did willfully
2 fail to file the required returns with the Internal Revenue Service, or with any proper officer of
3 the United States; in violation of Title 26, United States Code, Section 7203.

4 **FORFEITURE ALLEGATION:** (18 U.S.C. § 982)

5 The allegations in Count One above, are hereby realleged and incorporated herein.

6 As a result of the offense alleged in Count One above, the defendant shall forfeit to the
7 United States \$25,300, as property involved in and traceable to said offense.

8 If, as a result of any act or omission of the defendant, any of the \$25,300

- 9 a. cannot be located upon the exercise of due diligence;
10 b. has been transferred or sold to or deposited with, a third party;
11 c. has been placed beyond the jurisdiction of the Court;
12 d. has been substantially diminished in value; or
13 e. has been commingled with other property which cannot be divided without
14 difficulty;

15 the defendant shall forfeit to the United States any and all interests the defendant has in any other
16 property (not to exceed \$25,300), including but not limited to the following: real property and
17 improvements located at 478 Redway Drive, Redway, California, identified by the Assessor as
18 Assessor's Parcel Number 077-261-16; in accordance with Title 18, United States Code, Sections
19 982(a)(1) and (b)(1).

20 A True Bill.

21 DATED: 11-12, 2002

Wilton S. Hnaga
22 FOREPERSON

23 KEVIN V. RYAN
24 United States Attorney

25 Charles B. Burch
26 CHARLES B. BURCH
27 Chief, Criminal Division

28 Approved as to Form: EJK
EJK

INDICTMENT