

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

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

FILED
AUG - 2 2012

DEFENDANT - U.S.

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

▶ KRISTIE GALE MEYER

DISTRICT COURT NUMBER

CR12-00599 ^{PJH}

PROCEEDING

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

Internal Revenue Service

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

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) WADE M. RHYNE AUSA

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction } Federal State
- 6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

} If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

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: 08/20/2012 @ 9:30 am Before Judge: Kandis A. Westmore

Comments:

**PENALTY SHEET ATTACHMENT
DEFENDANT KRISTIE GALE MEYER**

COUNTS ONE THROUGH TEN: (18 U.S.C. § 1341 - Mail Fraud)

PENALTY: Statutory Penalty Generally:
Maximum Imprisonment: 20 Years
Maximum Fine: \$250,000
Maximum Supervised Release: 3 Years
Special Assessment: \$100 (per count)

COUNTS ELEVEN THROUGH THIRTEEN: (26 U.S.C. § 7201– Tax Evasion)

PENALTY:
Maximum Imprisonment: 5 Years
Maximum Fine: \$100,000
Maximum Supervised Release: 3 Years
Special Assessment: \$100 (per count)

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: Oakland

~~CR12-00599~~ PJH

UNITED STATES OF AMERICA,

v.

KRISTIE GALE MEYER,

FILED

AUG - 2 2012

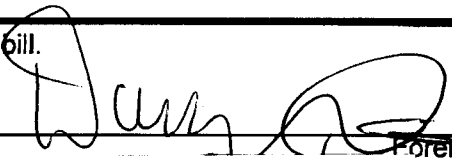
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

DEFENDANT.

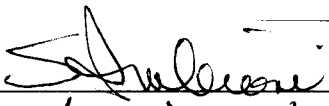
INDICTMENT

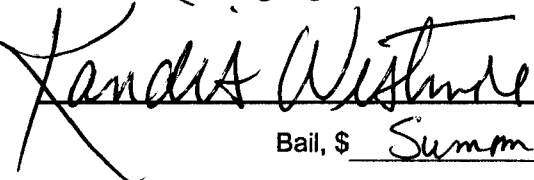
18 U.S.C. § 1341 – Mail Fraud; 26 U.S.C. § 7201 – Tax
Evasion; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
Mail Fraud Forfeiture

A true bill.


Foreman

Filed in open court this 9 day of
AUGUST


Clerk


Bail, \$ Summons 8/20/12

1 MELINDA HAAG (CABN 132612)
United States Attorney

FILED

AUG - 2 2012

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

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

CR12-00599

PJH

12 UNITED STATES OF AMERICA,)
13 Plaintiff,)
14 v.)
15)
16 KRISTIE GALE MEYER,)
17 Defendant.)

Criminal No.:
VIOLATIONS: 18 U.S.C. § 1341 – Mail Fraud
(10 Counts); 26 U.S.C. § 7201 – Tax Evasion
(3 Counts); 18 U.S.C. § 981(a)(1)(C) and 28
U.S.C. § 2461(c) – Mail Fraud Forfeiture
OAKLAND VENUE

18 _____)
19 INDICTMENT

20 The Grand Jury charges:

21 INTRODUCTORY ALLEGATIONS

22 At all times relevant to this Indictment:

23 1. The defendant, KRISTIE GALE MEYER (“MEYER”), worked as a secretary,
24 office manager, and bookkeeper for Ansil Realty & Investment Co. Inc. (“ANSIL”) from in or
25 about 1991 through in or about January 2009.

26 2. ANSIL was a real estate investment company that purchased and managed real
27 estate properties in California and elsewhere. ANSIL owned and managed its real estate
28 properties through multiple business entities. ANSIL was most recently located in Lafayette,

INDICTMENT

1 California, and formerly located in Oakland, California.

2 3. KLP Properties, Inc. (“KLP”) was a commercial real estate management and
3 leasing company that was a joint owner and managing tenant in common of several investment
4 properties located in northern California and the Pacific Northwest, together with ANSIL, and
5 others.

6 4. MEYER’s duties and responsibilities included managing the books, records, and
7 bank accounts, along with creating financial accounting reports and reconciliations for ANSIL,
8 and for certain properties jointly owned by ANSIL and KLP. Over time, MEYER gained more
9 responsibility and was trusted to handle her duties with minimal or no supervision by ANSIL and
10 KLP (hereafter collectively, “the victims”).

11 THE SCHEME TO DEFRAUD

12 5. From in or about April 2002, and continuing through in or about January 2009, in
13 the Northern District of California and elsewhere, the defendant,

14 KRISTIE GALE MEYER,

15 did knowingly devise and intentionally devise a scheme and artifice to defraud, and did
16 knowingly and intentionally obtain money and property by means of materially false and
17 fraudulent pretenses, representations, promises, and omissions of material facts, and, for the
18 purpose of executing such scheme and artifice to defraud, did knowingly deposit and cause to be
19 deposited matters to be sent and delivered by mail and by private and commercial interstate
20 carrier.

21 6. As part of the scheme to defraud, defendant MEYER embezzled, stole, and
22 defrauded the victims of money by several means, including: (a) without authorization, paying
23 her credit card bills with checks drawn on the victims’ bank accounts, and using those funds for
24 her personal benefit, including taking cash advances on her credit card accounts and making
25 payments to online gambling websites, among other unauthorized transactions; and (b) without
26 authorization, writing checks drawn on the victims’ bank accounts, depositing those checks
27 directly into her personal bank account, and using those funds for her personal benefit, among
28 other unauthorized transactions.

1 7. Defendant MEYER concealed her scheme to defraud by several means,
 2 including: (a) making false accounting entries in the victims' accounting system to make her
 3 fraudulent transactions appear to be legitimate business expenditures; and (b) destroying copies
 4 of the cancelled checks she embezzled to prevent the victims from detecting the actual payees on
 5 the checks.

6 COUNTS ONE THROUGH TEN: (18 U.S.C. § 1341 – Mail Fraud)

7 8. Paragraphs 1 through 7 are realleged and incorporated herein by reference.

8 9. On or about the dates set forth below, in the Northern District of California and
 9 elsewhere, the defendant,

10 KRISTIE GALE MEYER,

11 to execute the material scheme and artifice to defraud the victims, and to obtain money and
 12 property by means of materially false and fraudulent pretenses, representations, promises, and
 13 omissions of material facts, did knowingly deposit and cause to be deposited matters to be sent
 14 from the Northern District of California and delivered by mail and by private and commercial
 15 interstate carrier to Chase Card Services in Elgin, Illinois, as set forth below:

| COUNT | DATE | MAILING |
|-------|-------------------|--|
| 1 | March 20, 2008 | Check # 4891 in the amount of \$20,000 |
| 2 | April 16, 2008 | Check # 5965 in the amount of \$9,500 |
| 3 | May 30, 2008 | Check # 1571 in the amount of \$9,500 |
| 4 | June 18, 2008 | Check # 4970 in the amount of \$7,500 |
| 5 | July 22, 2008 | Check # 6588 in the amount of \$9,500 |
| 6 | August 1, 2008 | Check # 6602 in the amount of \$9,000 |
| 7 | September 2, 2008 | Check # 5554 in the amount of \$4,500 |
| 8 | December 12, 2008 | Check # 5109 in the amount of \$6,750 |
| 9 | December 15, 2008 | Check # 5113 in the amount of \$9,179.74 |
| 10 | December 24, 2008 | Check # 5122 in the amount of \$7,000 |

26 Each in violation of Title 18, United States Code, Section 1341.

27 ///

28 ///

1 COUNT ELEVEN: (26 U.S.C. § 7201 – Tax Evasion)

2 10. Paragraphs 1 through 7 are realleged and incorporated herein by reference.

3 11. On or about March 29, 2007, in the Northern District of California, the
4 defendant,

5 KRISTIE GALE MEYER,

6 then a resident of Concord, California, who during the calendar year 2006 was married, did
7 willfully attempt to evade and defeat a large part of the income tax due and owing by her and her
8 spouse to the United States of America for the calendar year 2006, by filing and causing to
9 be filed with the Director, Internal Revenue Service Center, a false and fraudulent joint United
10 States Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, as that
11 false return stated that the joint taxable income of MEYER and her spouse for the calendar year
12 2006 was the sum of \$69,053, when, in fact, as MEYER then and there knew, their joint taxable
13 income for the calendar year was substantially in excess of the amount stated on the return, and,
14 upon the additional taxable income, a substantial additional tax was due and owing to the United
15 States of America, in violation of Title 26, United States Code, Section 7201.

16 COUNT TWELVE: (26 U.S.C. § 7201 – Tax Evasion)

17 12. Paragraphs 1 through 7 are realleged and incorporated herein by reference.

18 13. On or about February 17, 2008, in the Northern District of California, the
19 defendant,

20 KRISTIE GALE MEYER,

21 then a resident of Concord, California, who during the calendar year 2007 was married, did
22 willfully attempt to evade and defeat a large part of the income tax due and owing by her and her
23 spouse to the United States of America for the calendar year 2007, by filing and causing to
24 be filed with the Director, Internal Revenue Service Center, a false and fraudulent joint United
25 States Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, as that
26 false return stated that the joint taxable income of MEYER and her spouse for the calendar year
27 2007 was the sum of \$55,443, when, in fact, as MEYER then and there knew, their joint taxable
28 income for the calendar year was substantially in excess of the amount stated on the return, and,

1 upon the additional taxable income, a substantial additional tax was due and owing to the United
2 States of America, in violation of Title 26, United States Code, Section 7201.

3 COUNT THIRTEEN: (26 U.S.C. § 7201 – Tax Evasion)

4 14. Paragraphs 1 through 7 are realleged and incorporated herein by reference.

5 15. On or about April 11, 2009, in the Northern District of California, the
6 defendant,

7 KRISTIE GALE MEYER,

8 then a resident of Concord, California, who during the calendar year 2008 was married, did
9 willfully attempt to evade and defeat a large part of the income tax due and owing by her and her
10 spouse to the United States of America for the calendar year 2008, by filing and causing to
11 be filed with the Director, Internal Revenue Service Center, a false and fraudulent joint United
12 States Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, as that
13 false return stated that the joint taxable income of MEYER and her spouse for the calendar year
14 2008 was the sum of \$63,771, when, in fact, as MEYER then and there knew, their joint taxable
15 income for the calendar year was substantially in excess of the amount stated on the return, and,
16 upon the additional taxable income, a substantial additional tax was due and owing to the United
17 States of America, in violation of Title 26, United States Code, Section 7201.

18 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Mail
19 Fraud Forfeiture)

20 16. The factual allegations contained in Counts One through Ten of this Indictment
21 are hereby realleged and by this reference fully incorporated herein for the purpose of alleging
22 forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United
23 States Code, Section 2461(c).

24 17. Upon a conviction of any of the offenses alleged in Counts One through Ten, the
25 defendant,

26 KRISTIE GALE MEYER,

27 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C)
28 and Title 28, United States Code, Section 2461(c), all right, title, and interest in property, real

1 and personal, constituting, derived from, or traceable to the proceeds that defendant obtained
2 directly or indirectly as a result of the offenses.

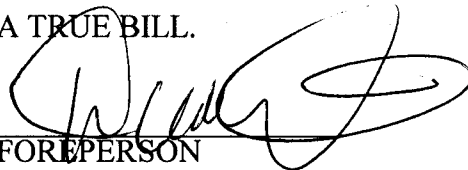
3 18. If, as a result of any act or omission of the defendant, any of said property

- 4 a. cannot be located upon the exercise of due diligence;
- 5 b. has been transferred or sold to or deposited with, a third person;
- 6 c. has been placed beyond the jurisdiction of the Court;
- 7 d. has been substantially diminished in value; or
- 8 e. has been commingled with other property which cannot be divided without
9 difficulty;

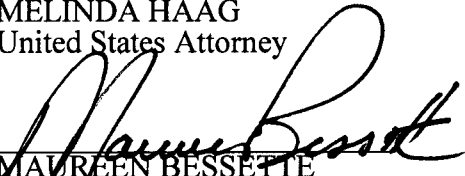
10 any and all interest defendant has in any other property, up to value of the property described
11 above, shall be forfeited to the United States, pursuant to Title 21, United States Code, Section
12 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

14 DATED: August 2, 2012

A TRUE BILL.


FOREPERSON

17 MELINDA HAAG
United States Attorney

18 
19 MAUREEN BESSETTE
20 Chief, Oakland Branch

21 (Approved as to form: 
22 AUSA WADE M. RHYNE
23
24
25
26
27
28

United States District Court
Northern District of California

FILED

AUG - 2 2012

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

CRIMINAL COVER SHEET

Instructions: Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case. Please place this form on top of the Defendant Information Form.

Case Name:

USA v. KRISTIE GALE MEYER

Case Number:

CR12-00599

PJH

Total Number of Defendants:

1 2-7 _____ 8 or more _____

Is This Case Under Seal?

Yes _____ No

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes _____ No

Venue (Per Crim. L.R. 18-1):

SF _____ OAK SJ _____

Is this a death-penalty-eligible RICO Act gang case?

Yes _____ No

Assigned AUSA (Lead Attorney):

WADE M. RHYNE

Comments:

[Empty rectangular box for comments]

Date Submitted:

08/02/2012

