KEVIN V. RYAN (CSBN 118321)
United States Attorney

ORIGINAL
FILED
AUG 12 2004
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CRB

UNITED STATES OF AMERICA, Plaintiff, v. RANDOLPH S. BRONTE, Defendant.	CR No. 04-0259 VIOLATIONS: 26 USC § 7201 - Tax Evasion SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (26 U.S.C. § 7201)

On or about August 10, 1999, in the Northern District of California, the defendant

RANDOLPH S. BRONTE

then a resident of Tiburon, California and doing business as Stephen Bronte Partners, did willfully and knowingly attempt to evade and defeat the income tax due and owing by defendant to the United States of America for the calendar year 1998 by preparing, signing, and mailing or otherwise delivering, and causing to be prepared, signed and mailed or otherwise delivered, a false and fraudulent individual income tax return, which return was filed with the Internal Revenue Service, wherein it was stated that the tax due to the United States for the calendar year 1998 was " zero" whereas, as he then and there well knew and believed, the tax due and owing to the United States for the calendar year was in truth

and in fact $198,813.00

In violation of Title 26, United States Code, Section 7201.

COUNT TWO: (26 U.S.C. § 7201)

On or about October 15, 2000, in the Northern District of California, the defendant

RANDOLPH S. BRONTE

then a resident of Tiburon, California and doing business as Stephen Bronte Partners, did willfully and knowingly attempt to evade and defeat the income tax due and owing by defendant to the United States of America for the calendar year 1999 by preparing, signing, and mailing or otherwise delivering, and causing to be prepared, signed and mailed or otherwise delivered, a false and fraudulent individual income tax return, which return was filed with the Internal Revenue Service, wherein it was stated that the tax due to the United States for the calendar year 1999 was " zero" whereas, as he then and there well knew and believed, the tax due and owing to the United States for the calendar year was in truth and in fact $,1,591,152.00.

In violation of Title 26, United States Code, Section 7201.

COUNT THREE: (26 U.S.C. § 7201)

On or about October 15, 2001, in the Northern District of California, the defendant

RANDOLPH S. BRONTE

then a resident of Tiburon, California and doing business as Stephen Bronte Partners, did willfully and knowingly attempt to evade and defeat the income tax due and owing by defendant to the United States of America for the calendar year 2000 by preparing, signing, and mailing or otherwise delivering, and causing to be prepared, signed and mailed or otherwise delivered, a false and fraudulent individual income tax return, which return was filed with the Internal Revenue Service, wherein it was stated that the tax due to the United States for the calendar year 2000 was "zero" whereas, as he then and there well knew and believed, the tax due and owing to the United States for the calendar year was in truth and in fact $222,943.00.

In violation of Title 26, United States Code, Section 7201..

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SENTENCING ENHANCEMENT ALLEGATIONS

With respect to all counts of the Indictment

(A) The tax loss exceeds $2,000,000.00 and is composed of the following amounts of tax loss:

Count	Tax Loss
1	$198,813.00
2	$1,591,152.00
3	$222,943.00

(B) Sophisticated means were used to impede discovery of the existence or extent of the offenses charged in the Indictment

A True Bill

FOREPERSON

KEVIN V. RYAN
United States Attorney

ROSS W. NADEL
Chief, Criminal Section

Approved as to Form

AUSA JAY R. WEILL