

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

CR 14 295

TEA

ROBERT BRADLEY STRAHAN, a/k/a Robin Bradley, **SEALED**
a/k/a Kaola Bradley Strahan, **BY COURT ORDER**

FILED

DEFENDANT(S).

MAY 29 2014

INDICTMENT

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

Title 18 U.S.C., Section 1343 - Wire Fraud ;
Title 18 U.S.C., Section 1341 - Mail Fraud;
Title 18 U.S.C., Section 981(a)(1)(C) and
28 U.S.C. Section 2461(c) - Fraud Forfeiture

A true bill.

Nancy J. Peterson
Foreman

Filed in open court this 29th day of

May 2014.

Karen H. Hor

Clerk

Bail, \$ NO BAIL WARRANT

Jaime S

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

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

Title 18 U.S.C., Section 1343 - Wire Fraud;
Title 18 U.S.C., Section 1341 - Mail Fraud;
Title 18 U.S.C., Section 981(a)(1)(C) and
28 U.S.C. Section 2461(c) - Fraud Forfeiture

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: Please see attachment.

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

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SEALED
COURT ORDER

DEFENDANT - U.S.

ROBERT STRAHAN, a/k/a Robin Bradley, a/k/a
Kaola Bradley Strahan

DISTRICT COURT NUMBER

CR 14 295 TEH

PROCEEDING

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

Federal Bureau of Investigation

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 re prosecution 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)

Hallie M. Hoffman

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.
1) 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)

FILED

MAY 29 2014

IS IN CUSTODY

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

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

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments:

Attachment to Penalty Sheet

MAXIMUM PENALTIES (Each Count)

Counts One through Three: (Title 18, United States Code, Section 1343 - Wire Fraud)

Imprisonment: 20 years

Fine: \$250,000 (or twice the value of the property involved in the offense, whichever is greater)

Supervised Release: 3 years

Special Assessment: \$100

Restitution: To be determined by the Court

TEH

SEALED
BY COURT CLERK

FILED

MAY 29 2014

Counts Four and Five: (Title 18, United States Code, Section 1341 - Mail Fraud)

Imprisonment: 20 years

Fine: \$250,000 (or twice the value of the property involved in the offense, whichever is greater)

Supervised Release: 3 years

Special Assessment: \$100

Restitution: To be determined by the Court

HARD W. WICKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 MELINDA HAAG (CABN 132612)
United States Attorney

FILED

MAY 29 2014

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

**SEALED
BY COURT ORDER**

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

TEH

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ROBERT BRADLEY STRAHAN,
a/k/a Robin Bradley,
15 a/k/a Kaola Bradley Strahan,

16 Defendant.

NO **CR 14 295**

VIOLATIONS: Title 18 United States Code, Section 1343—Wire Fraud; Title 18 United States Code, Section 1341—Mail Fraud; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Fraud Forfeiture

SAN FRANCISCO VENUE

17
18 INDICTMENT

19 The Grand Jury charges:

20 Introductory Allegations:

21 At all times relevant to this Indictment, unless otherwise indicated:

22 1. The defendant, Robert Bradley STRAHAN, a/k/a Robin Bradley, a/k/a Kaola
23 Bradley Strahan, was employed by a non-profit trade association (whose full identity is known to the
24 Grand Jury but identified in this Indictment by the initials "M.E."), located in San Francisco, California
25 in the Northern District of California. From approximately December 2007 through April 28, 2014
26 STRAHAN worked for M.E.

27
28
INDICTMENT

1	September 14, 2012	Email from STRAHAN to M.E. Board of Directors
2	December 16, 2013	Email from STRAHAN to M.E. Board of Directors
3	March 17, 2014	Email from STRAHAN to M.E. Board of Directors

Each in violation of Title 18, United States Code, Section 1343.

COUNTS FOUR AND FIVE: (18 U.S.C. § 1341 – Mail Fraud)

11. Paragraphs 1 through 9 are realleged and incorporated as if fully set forth here.

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

ROBERT BRADLEY STRAHAN,

for the purpose of executing his material scheme and artifice to defraud, and to obtain money and property from his victims by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts, did knowingly use, and cause to be used, the mails to carry out and to attempt to carry out an essential part of his scheme, as more specifically described below:

4	April 21, 2014	Package sent from Kentucky ^{NY} to California via United Parcel Service, tracking number 1Z293E6F0379001585, paid for with a Bank of Marin credit card ending in 9871.
5	April 22, 2014	Package sent from Nevada ^{NEVADA} to California via United Parcel Service, tracking number 1Z104Y1F1390843763, paid for with a Bank of Marin credit card ending in 9871.

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

FORFEITURE ALLEGATION: (18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461)

13. The allegations contained in Counts One through Three of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

1 14. Upon conviction of any of the offenses alleged in Counts One through Three of this
2 Indictment, the defendant,

3 ROBERT BRADLEY STRAHAN,

4 shall forfeit to the United States of America pursuant to Title 18, United States Code, Section
5 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which
6 constitutes or is derived from proceeds traceable to the offense.

7 15. If, as a result of any act or omission of the defendant, any of said property

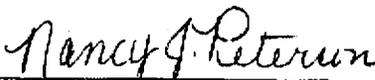
- 8 a) cannot be located upon the exercise of due diligence;
9 b) has been transferred or sold to or deposited with, a third person;
10 c) has been placed beyond the jurisdiction of the Court;
11 d) has been substantially diminished in value; or
12 e) has been commingled with other property which cannot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

14 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
15 United States Code, Section § 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1)
16 and Title 28, United States Code, Section 2461(c).

17 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
18 Code, Section 2461(c).

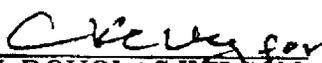
19 DATED: May 29, 2014 _____

A TRUE BILL.

21 
22 Nancy J. Peterson

FOREPERSON

23 MELINDA HAAG
United States Attorney

24
25 
26 J. DOUGLAS WILSON
Chief, Criminal Division

27 (Approved as to form: _____)
28 AUSA Hallie M. Hoffman

United States District Court
Northern District of California

SEALED
COURT ORDER

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.

TEH

Case Name:

Case Number:

USA v. ROBERT BRADLEY STRAHAN, a/k/a Robin Bradley
a/k/a Kaola Bradley Strahan

CR

14 295

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 EUR MON

Is any defendant charged with a death-penalty-eligible crime?

Yes No

Assigned AUSA (Lead Attorney):

Hallie M. Hoffman

Is this a RICO Act gang case?

Yes No

Date Submitted:

May 29, 2014

Comments:

FILED
MAY 29 2014
RICHARD W. WIERLING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Save Print Clear Form