

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

2013 OCT -3 P 3:15

U.S. DISTRICT COURT  
SAN FRANCISCO, CALIFORNIA

UNITED STATES OF AMERICA,

v.

**TEH**

**CR 13**

**663**

SANDRA LYNN VITORELO

DEFENDANT(S).

## INDICTMENT

26 U.S.C. § 7206(1) - False Tax Return

A true bill.

*Nancy J. Peterson*  
Foreman

Filed in open court this 3<sup>rd</sup> day of

October, 2013.

*Katon*

~~KAREN L. PER~~

JOSEPH C. SPERO

Clerk

UNITED STATES MAGISTRATE JUDGE

Bail, \$

summons for 10/8/2013

1 MELINDA HAAG (CABN 132612)  
2 United States Attorney

FILED

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U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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

TEH

11 UNITED STATES OF AMERICA,

CR 13

663

12 Plaintiff,

VIOLATIONS: 26 U.S.C. § 7206(1) -  
False Tax Return

13 v.

14 SANDRA LYNN VITORELO,

SAN FRANCISCO VENUE

15 Defendant.  
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17 I N D I C T M E N T

18 The Grand Jury charges:

19 COUNT ONE: (26 U.S.C. § 7206(1) - Filing False Tax Return)

20 On or about October 19, 2007, in the Northern District of California, the defendant,  
21 SANDRA LYNN VITORELO,  
22 a resident of Sonoma County, California, did willfully and knowingly make and subscribe a U.S.  
23 Individual Income Tax Return, Form 1040, for the calendar year 2006, which was filed with the  
24 Internal Revenue Service and verified by the defendant in a written declaration that it was made  
25 under the penalties of perjury, which income tax return she did not believe to be true and correct  
26 as to every material matter, in that it reported \$94,858 in total income, whereas, as the defendant  
27 then and there knew, her total income was greater than the amount reported.

28 All in violation of Title 26, United States Code, Section 7206(1).

1 COUNT TWO: (26 U.S.C. § 7206(1) - Filing False Tax Return)

2 On or about June 2, 2008, in the Northern District of California, the defendant,

3 SANDRA LYNN VITORELO,

4 a resident of Sonoma County, California, did willfully and knowingly make and subscribe a U.S.  
5 Individual Income Tax Return, Form 1040, for the calendar year 2007, which was filed with the  
6 Internal Revenue Service and verified by the defendant in a written declaration that it was made  
7 under the penalties of perjury, which income tax return she did not believe to be true and correct  
8 as to every material matter, in that it reported \$87,221 in total income, whereas, as the defendant  
9 then and there knew, her total income was greater than the amount reported.

10 All in violation of Title 26, United States Code, Section 7206(1).

11 COUNT THREE: (26 U.S.C. § 7206(1) - Filing False Tax Return)

12 On or about March 10, 2009, in the Northern District of California, the defendant,

13 SANDRA LYNN VITORELO,

14 a resident of Sonoma County, California, did willfully and knowingly make and subscribe a U.S.  
15 Individual Income Tax Return, Form 1040, for the calendar year 2008, which was electronically  
16 filed with the Internal Revenue Service and verified by the defendant in a written declaration that  
17 it was made under the penalties of perjury, which income tax return she did not believe to be true  
18 and correct as to every material matter, in that it reported \$117,084 in total income, whereas, as  
19 the defendant then and there knew, her total income was greater than the amount reported.

20 All in violation of Title 26, United States Code, Section 7206(1).

21 COUNT FOUR: (26 U.S.C. § 7206(1) - Filing False Tax Return)

22 On or about April 15, 2010, in the Northern District of California, the defendant,

23 SANDRA LYNN VITORELO,

24 a resident of Sonoma County, California, did willfully and knowingly make and subscribe a U.S.  
25 Individual Income Tax Return, Form 1040, for the calendar year 2009, which was filed with the  
26 Internal Revenue Service and verified by the defendant in a written declaration that it was made  
27 under the penalties of perjury, which income tax return she did not believe to be true and correct  
28 as to every material matter, in that it reported \$131,952 in total income, whereas, as the

1 defendant then and there knew, her total income was greater than the amount reported.

2 All in violation of Title 26, United States Code, Section 7206(1).

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A True Bill

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Dated: *October 3, 2013*

*Nancy J. Peterson*  
FOREPERSON

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MELINDA HAAG  
United States Attorney

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*J. Douglas Wilson*

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J. DOUGLAS WILSON  
Chief, Criminal Division

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Approved as to Form

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*Cynthia Stier*

CYNTHIA STIER  
Assistant United States Attorney  
Tax Division

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