

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

AUG - 7 2014

UNITED STATES OF AMERICA,
V.

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

ROBERT BRADLEY STRAHAN,
a/k/a ROBIN BRADLEY,
a/k/a KAOLA BRADLEY STRAHAN,

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1343 - Wire Fraud;
18 U.S.C. § 1341 - Mail Fraud;
26 U.S.C. § 7201 - Tax Evasion; and
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) - Fraud Forfeiture

A true bill.

Nancy J. Peterson
Foreman

Filed in open court this 7th day of

August 2014
[Signature]
Clerk

Bail, \$ no process required

[Signature]
Nathaniel Cousins
United States Magistrate Judge

AO 257 (Rev. 8/78)

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

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

- 18 U.S.C. § 1343 - Wire Fraud; Petty
- 18 U.S.C. § 1341 - Mail Fraud; Minor
- 26 U.S.C. § 7201 - Tax Evasion; and Misdemeanor
- 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) - Fraud Forfeiture Felony

PENALTY: Please see attachment.

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

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

ROBERT BRADLEY STRAHAN, a/k/a ROBIN BRADLEY STRAHAN, a/k/a KAOLA BRADLEY STRAHAN

DISTRICT COURT NUMBER CR 14-00295 TEH

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NORTHERN DISTRICT OF CALIFORNIA

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)

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
05/30/14

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: _____ Before Judge: _____

Comments:

United States v. Robert Bradley Strahan

Attachment to Penalty Sheet

MAXIMUM PENALTIES (Each Count)

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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

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

Counts Six and Seven:(Title 26, United States Code, Section 7201 - Tax)

Imprisonment: 5 years
Fine: \$250,000 (or twice the value of the property involved in the offense,
whichever is greater)

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MELINDA HAAG (CABN 132612)
United States Attorney

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,) NO. 14-295 TEH
)
v.)
)
ROBERT BRADLEY STRAHAN,)
a/k/a Robin Bradley,)
a/k/a Kaola Bradley Strahan,)
Defendant.)
)

VIOLATIONS: Title 18 United States Code, Section 1343—Wire Fraud; Title 18 United States Code, Section 1341—Mail Fraud; Title 26 United States Code, Section 7201—Tax Evasion; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Fraud Forfeiture

SAN FRANCISCO VENUE

SUPERSEDING INDICTMENT

The Grand Jury charges:

Introductory Allegations:

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

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

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 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 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.

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

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

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

ROBERT BRADLEY STRAHAN,

a resident of San Francisco, California, who during the calendar year 2009, did willfully attempt to

1 evade and defeat a part of the income tax due and owing by him to the United States of America for the
2 calendar year 2009, by filing and causing to be filed with the Director, Internal Revenue Service Center,
3 a false and fraudulent United States Individual Income Tax Return, Form 1040EZ, on behalf of himself,
4 as that false return, it was stated that STRAHAN's taxable income for the calendar year 2009 was the
5 sum of \$53,126, when in fact, as STRAHAN then and there knew, his taxable income for the calendar
6 year was substantially in excess of the amount stated on the return, and upon the additional taxable
7 income, a substantial additional tax was due and owing to the United States of America.

8 All in violation of Title 26, United States Code, Section 7201.

9 COUNT SEVEN: (26 U.S.C. § 7201 – Tax Evasion)

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

11 16. On or about April 15, 2011, in the Northern District of California, the defendant,

12 ROBERT BRADLEY STRAHAN,

13 a resident of San Francisco, California, who during the calendar year 2010, did willfully attempt to
14 evade and defeat a part of the income tax due and owing by him to the United States of America for the
15 calendar year 2010, by filing and causing to be filed with the Director, Internal Revenue Service Center,
16 a false and fraudulent United States Individual Income Tax Return, Form 1040, on behalf of himself, as
17 that false return, it was stated that STRAHAN's taxable income for the calendar year 2010 was the sum
18 of \$68,443, when in fact, as STRAHAN then and there knew, his taxable income for the calendar year
19 was substantially in excess of the amount stated on the return, and upon the additional taxable income, a
20 substantial additional tax was due and owing to the United States of America.

21 All in violation of Title 26, United States Code, Section 7201.

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

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

27 18. Upon conviction of any of the offenses alleged in Counts One through Three of this
28 Superseding Indictment, the defendant,

ROBERT BRADLEY STRAHAN,

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

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

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

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

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

DATED: August 7, 2014

A TRUE BILL.

Nancy J. Peterson
FOREPERSON

MELINDA HAAG
United States Attorney

J. Douglas Wilson
J. DOUGLAS WILSON
Chief, Criminal Division

(Approved as to form: *[Signature]*
AUSA Hallie M. Hoffman)