

SEALED BY ORDER
OF COURT

UNITED STATES DISTRICT COURT

E-filing

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

CR - 17 00379 LHK FILED NC

JUL 13 2017
SUSAN Y. SCONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

JORGE VISSANI,
JACQUELINE RAMOS
A/K/A JACKIE ACOSTA,
ANA BAJO A/K/A ANA COBRAUBIAS,
NORMA MORFIN, AND
ANTONIO AHUMADA

INDICTMENT

- COUNT 1: 18 U.S.C. § 286 – Conspiracy to Submit False Claims
- COUNTS 2-3: 18 U.S.C. § 1344(2) – Bank Fraud
- COUNTS 4-5: 18 U.S.C. § 1344(2) – Bank Fraud

A true bill.

Chr Dubs

Foreperson

Filed in open court this 13 day of July A.D. 2017

[Signature]

United States Magistrate Judge

Bail. \$ No bail, arrest warrants as to all defendants

DOCUMENT NO. 1e CSA'S INITIALS
DISTRICT COURT
CRIMINAL CASE PROCESSING

~~SEALED BY ORDER
OF COURT~~

E-filing

FILED

JUL 13 2017
CLERK SUSAN Y. SOONG
U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

LHK
NC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CR-17 00379

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE VISSANI,
JACQUELINE RAMOS A/K/A
JACKIE ACOSTA,
ANA BAJO A/K/A ANA COBRAUBIAS,
NORMA MORFIN, AND
ANTONIO AHUMADA,

Defendants.

Case No.

VIOLATIONS: 18 U.S.C. § 286 – Conspiracy
to Submit False Claims; 18 U.S.C. § 1344(2) –
Bank Fraud; 18 U.S.C. §§ 981(a)(1)(C),
982(a)(2)(A) and 28 U.S.C. § 2461(c) –
Forfeiture

SAN JOSE VENUE

UNDER SEAL

INDICTMENT

The Grand Jury charges:

Introduction

At all times material to this Indictment:

1. Defendant JORGE VISSANI (“VISSANI”) was a resident of Salinas, California.

2. Defendant JACQUELINE RAMOS a/k/a JACKIE ACOSTA (“RAMOS”) was a resident
of Salinas, California.

3. Defendant ANA BAJO a/k/a ANA COBRAUBIAS (“BAJO”) was a resident of Salinas,
California.

1 4. Defendant NORMA MORFIN (“MORFIN”) was a resident of Salinas, California.

2 5. Defendant ANTONIO AHUMADA (“AHUMADA”) was a resident of Salinas, California

3 6. The Internal Revenue Service (“IRS”) is an agency of the United States within the
4 Department of the Treasury of the United States responsible for enforcing and administering the tax laws
5 of the United States.

6 7. Individual Federal Income Tax Returns can be submitted to the IRS on Forms 1040 or
7 1040A.

8 8. Individuals who work and earn income above a certain threshold amount in the United
9 States are required to file an income tax return regardless of whether they are citizens or non-citizens.

10 9. Individuals filing Forms 1040 are required by law to provide on such returns an
11 appropriate identification number. Citizens typically use a social security number for this purpose.
12 However, certain individuals who are required to file an annual Form 1040 are not eligible to receive
13 social security numbers.

14 10. In the 1990s, the IRS initiated the Individual Taxpayer Identification Number (“ITIN”)
15 program to provide identification numbers to individuals who could not legally obtain social security
16 numbers. Through the ITIN program, individuals can file Forms 1040 using an ITIN rather than a social
17 security number. An ITIN is a nine-digit number in the same format as a social security number.

18 11. To obtain an ITIN, an individual must submit a completed IRS Form W-7 with required
19 documentary evidence to the IRS. If an ITIN application is approved, the resulting ITIN may be used to
20 file Forms 1040.

21 COUNT ONE: (18 U.S.C. § 286 – Conspiracy to Submit False Claims)

22 12. Beginning at least in or about June 2011, and continuing until at least in or about
23 December 2012, within the Northern District of California, the defendants,

24 JORGE VISSANI,
25 JACQUELINE RAMOS a/k/a JACKIE ACOSTA,
26 ANA BAJO a/k/a ANA COBRAUBIAS,
NORMA MORFIN, and
ANTONIO AHUMADA,

27 and others known and unknown to the Grand Jury, knowingly agreed, combined, and conspired with
28 others and each other to defraud the United States by obtaining and aiding to obtain the payment or

1 allowance of false, fictitious, and fraudulent claims.

2 Manner and Means of the Conspiracy

3 13. It was part of the conspiracy that defendants VISSANI, RAMOS, BAJO, MORFIN,
4 AHUMADA, and others known and unknown to the Grand Jury, embarked upon a scheme through
5 which they knowingly sought to steal money from the United States Department of Treasury through the
6 IRS by various means, including by preparing materially false and fraudulent Forms 1040 using ITIN's,
7 and/or fraudulent Forms W-2 or Forms 4852, and/or claiming fraudulent dependents, education expenses,
8 and/or credits, resulting in claims for fraudulent federal income tax refunds, and also including, among
9 other things, the means described in paragraphs 14 through 23, below.

10 14. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
11 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, caused the fraudulent returns
12 to be filed, some electronically and some by U.S. Mail, with the IRS, thereby claiming and attempting to
13 claim tax refunds, while knowing that such tax refund claims were false and fraudulent.

14 15. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
15 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, procured identification
16 documents of individuals not in the United States or subject to the tax laws of the United States for
17 purposes of obtaining ITINs, filed and caused to be filed Forms W-7 with the IRS to obtain ITINs, and
18 used or caused to be used ITINs to prepare and file fraudulent Forms 1040, which caused fraudulent tax
19 refunds to be disbursed.

20 16. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
21 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, procured social security
22 numbers of individuals without those individuals' knowledge, and used or caused to be used such social
23 security numbers to prepare and file fraudulent Forms 1040, which caused fraudulent tax refunds to be
24 disbursed.

25 17. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
26 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, procured social security
27 numbers of individuals with those individuals' knowledge, and used or caused to be used such social
28 security numbers to prepare and file fraudulent Forms 1040, which caused fraudulent tax refunds to be

1 disbursed.

2 18. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
3 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, used or caused to be used
4 actual Employer Identification Numbers of legitimate companies to create materially false and fraudulent
5 Forms W-2 or Forms 4852, and used or caused to be used fraudulent Forms W-2 or Forms 4852 to
6 prepare and file fraudulent Forms 1040, which caused fraudulent tax refunds to be disbursed.

7 19. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
8 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, used or caused to be used
9 legitimate Forms W-2 or Forms 4852 to prepare and file fraudulent Forms 1040, which caused fraudulent
10 tax refunds to be disbursed.

11 20. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
12 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, created and filed fraudulent
13 Forms 1040 claiming fraudulent dependents, education expenses, and/or credits, resulting in claims for
14 fraudulent federal income tax refunds, which caused fraudulent tax refunds to be disbursed.

15 21. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
16 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, directed the IRS to
17 electronically transfer amounts fraudulently claimed as income tax refunds to bank accounts controlled
18 by members of the conspiracy.

19 22. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
20 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, directed the IRS to send
21 fraudulent U.S. Treasury refund checks to addresses controlled by members of the conspiracy.

22 23. It was further part of the conspiracy that defendants VISSANI, RAMOS, BAJO,
23 MORFIN, AHUMADA, and others known and unknown to the Grand Jury, caused fraudulent U.S.
24 Treasury refund checks to be deposited with financial institutions, or cashed at businesses, located in the
25 Northern District of California.

26 All in violation of Title 18, United States Code, Section 286.

27 COUNTS TWO & THREE: (18 U.S.C. § 1344(2) – Bank Fraud)

28 24. Paragraphs 1 through 23 are re-alleged and incorporated by reference as though fully set

1 forth herein.

2 25. Beginning at least in or about August 2011, and continuing until at least in or about
3 December 2011, within the Northern District of California and elsewhere, the defendant,
4 JACQUELINE RAMOS a/k/a JACKIE ACOSTA,
5 and others known and unknown to the Grand Jury, knowingly and with the intent to defraud, executed a
6 scheme and artifice to defraud Wells Fargo Bank, N.A., and to obtain moneys, funds, credits, assets,
7 securities, and other property owned by, and under the custody and control of, Wells Fargo Bank, N.A.,
8 by means of material false and fraudulent pretenses, representation, promises, and concealment of
9 material facts.

10 26. At all times pertinent to this Indictment, Wells Fargo Bank, N.A., was a federally-insured
11 financial institution.

12 27. The fraudulent scheme operated in substance in the following manner:

13 a. Defendant RAMOS, and others known and unknown to the Grand Jury, would
14 obtain and cause to be obtained fraudulent U.S. Treasury refund checks which defendant RAMOS knew
15 to have been issued in response to fraudulent Forms 1040 filed with the IRS;

16 b. Defendant RAMOS, and others known and unknown to the Grand Jury, would
17 deposit and cause to be deposited fraudulent U.S. Treasury refund checks, bearing forged endorsements,
18 into bank accounts at Wells Fargo Bank, N.A., that RAMOS owned or controlled; and

19 c. Defendant RAMOS would withdraw from the Wells Fargo Bank, N.A., accounts
20 funds from the deposit of the fraudulent U.S. Treasury refund checks.

21 28. On or about the following dates, within the Northern District of California and elsewhere,
22 defendant RAMOS, and others known and unknown to the Grand Jury, committed and willfully caused
23 others to commit the following acts, each count constituting an execution of the fraudulent scheme:

Count	Date	Act
Two	8/19/2011	Deposit of \$2,966 check payable to Y.N.B.O. into defendant RAMOS' Wells Fargo Bank account (#XXXX4516)
Three	11/10/2011	Deposit of \$4,483 check payable to M.V.R. & C.F.B. into defendant RAMOS' Wells Fargo Bank account (#XXXX2791)

1 All in violation of Title 18, United States Code, Section 1344(2).

2 COUNTS FOUR & FIVE: (18 U.S.C. § 1344(2) – Bank Fraud)

3 29. Paragraphs 1 through 23 are re-alleged and incorporated by reference as though fully set
4 forth herein.

5 30. Beginning at least in or about November 2011, and continuing until at least in or about
6 April 2012, within the Northern District of California and elsewhere, the defendant,

7 ANTONIO AHUMADA,

8 and others known and unknown to the Grand Jury, knowingly and with the intent to defraud, executed a
9 scheme and artifice to defraud Wells Fargo Bank, N.A., and to obtain moneys, funds, credits, assets,
10 securities, and other property owned by, and under the custody and control of, Wells Fargo Bank, N.A.,
11 by means of material false and fraudulent pretenses, representation, promises, and concealment of
12 material facts.

13 31. At all times pertinent to this Indictment, Wells Fargo Bank, N.A., was a federally-insured
14 financial institution.

15 32. The fraudulent scheme operated in substance in the following manner:

16 a. Defendant AHUMADA, and others known and unknown to the Grand Jury, would
17 obtain and cause to be obtained fraudulent U.S. Treasury refund checks which defendant AHUMADA
18 knew to have been issued in response to fraudulent Forms 1040 filed with the IRS;

19 b. Defendant AHUMADA, and others known and unknown to the Grand Jury, would
20 deposit and cause to be deposited the fraudulent U.S. Treasury refund checks, bearing forged
21 endorsements, into bank accounts at Wells Fargo Bank, N.A., that AHUMADA owned or controlled; and

22 c. Defendant AHUMADA would withdraw from the Wells Fargo Bank, N.A.,
23 accounts funds from the deposit of the fraudulent U.S. Treasury refund checks.

24 33. On or about the following dates, within the Northern District of California and elsewhere,
25 defendant AHUMADA, and others known and unknown to the Grand Jury, committed and willfully
26 caused others to commit the following acts, each count constituting an execution of the fraudulent
27 scheme:

28 //

Count	Date	Act
Four	11/16/2011	Deposit of \$3,425 check payable to A.M. into defendant AHUMADA'S Wells Fargo Bank account (#XXXX0317)
Five	1/31/2012	Deposit of \$5,096 check payable to J.A.O.B. into defendant AHUMADA'S Wells Fargo Bank account (#XXXX0317)

All in violation of Title 18, United States Code, Section 1344(2).

FORFEITURE ALLEGATION: (18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A) and 28 U.S.C. § 2461(c) – Forfeiture)

34. The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(A) and Title 21, United States Code, Section 2461(c).

35. Upon conviction of any of the offenses alleged in Counts Two through Five of this Indictment, defendants,

JACQUELINE RAMOS a/k/a JACKIE ACOSTA, and
ANTONIO AHUMADA,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(A), and Title 21, United States Code, Section 2461(c), any property constituting or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s). The property to be forfeited includes, but is not limited to, a money judgment.

36. If, as a result of any act or omission of defendant RAMOS or defendant AHUMADA, any of such 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

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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, Sections 981(a)(1)(C), 982(a)(2)(A) and Title 28, United States Code, Section 2461(c).

July 13, 2017
DATE

A TRUE BILL
Ch Oaks
FOREPERSON

BRIAN J. STRETCH
United States Attorney

Elise Becker
ELISE BECKER
Deputy Chief, Criminal Division

Approved as to Form
Michael G. Pitman
MICHAEL G. PITMAN
Assistant United States Attorney
Tax Division

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

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

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

NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

OFFENSE CHARGED

Count One: 18 U.S.C. § 286 - Conspiracy to Submit False Claims

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 assessment fee

DEFENDANT - U.S.

JORGE VISSANI

DISTRICT COURT NUMBER

CR-17 00379 LHK

DEFENDANT

NC

PROCEEDING

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

IRS S/A Scott Geissler

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 BRIAN J. STRETCH

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

AUSA Michael Pitman

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- If not detained give date any prior summons was served on above charges
Is a Fugitive
Is on Bail or Release from (show District)

IS IN CUSTODY

- On this charge
On another conviction
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: None

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:

Delta 1

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

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

OFFENSE CHARGED

COUNT ONE: 18 U.S.C. § 286 - Conspiracy to Submit False Claims Petty
COUNTS 2-3: 18 U.S.C. § 1344(2) - Bank Fraud Minor Misdemeanor Felony
PENALTY: Count One: 10 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 special assessment fee
Counts 2-3: 30 years imprisonment, \$1,000,000 fine, 5 years supervised release, \$100 special assessment fee

DEFENDANT - U.S.

JACQUELINE RAMOS A/K/A JACKIE ACOSTA

DISTRICT COURT NUMBER

CR-17 00379 FILED JUL 13 2017 LHK

PROCEEDING

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

IRS S/A Scott Geissler

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:

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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 BRIAN STRETCH

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA Michael Pitman

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

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

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Bail Amount: None

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:

Δ2

FILED BY ORDER OF COURT

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

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

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

NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

OFFENSE CHARGED

Count One: 18 U.S.C. § 286 - Conspiracy to Submit False Claims

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 assessment fee

DEFENDANT - U.S.

ANA BAJO aka ANA COBRAUBIAS

DISTRICT COURT NUMBER

CR-17 00379

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)

LHK
FILED NC

JUL 13 2017

IS IN CUSTODY

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

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

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

PROCEEDING

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

IRS S/A Scott Geissler

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:

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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 BRIAN J. STRETCH

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA Michael Pitman

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: None

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Date/Time: Before Judge:

Comments:

Delta 3

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

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

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

OFFENSE CHARGED

Count One: 18 U.S.C. § 286 - Conspiracy to Submit False Claims

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 assessment fee

DEFENDANT - U.S.

NORMA MORFIN

DISTRICT COURT NUMBER

CR-17 00379 DEFENDANT

PROCEEDING

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

IRS S/A Scott Geissler

person is awaiting trial in another Federal or State Court, give name of court

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Name and Office of Person Furnishing Information on this form BRIAN J. STRETCH

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA Michael Pitman

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
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

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Defendant Address:

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Comments:

Handwritten signature/initials

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SEALED BY ORDER OF COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

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SAN JOSE DIVISION

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COUNTS 4-5: 18 U.S.C. § 1344(2) - Bank Fraud Minor
 Misdemeanor
 Felony
PENALTY: Count One: 10 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 special assessment fee
Counts 4-5: 30 years imprisonment, \$1,000,000 fine, 5 years supervised release, \$100 special assessment fee

DEFENDANT - U.S.

ANTONIO AHUMADA

DISTRICT COURT NUMBER

CR-17 00379

LHK

DEFENDANT

IS NOT IN CUSTODY

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- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

FILED
JUL 13 2017

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

IS IN CUSTODY

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- 5) On another conviction } Federal State
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If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

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

IRS S/A Scott Geissler

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U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA Michael Pitman

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Bail Amount: None

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Defendant Address:

Date/Time: Before Judge:

Comments:

Δ5

SEALED BY ORDER
OF COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FILED
JUL 13 2017

CRIMINAL COVER SHEET

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE, CALIFORNIA

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CR-17 00379

CASE NAME:

USA v. JORGE VISSANI, et al.

CASE NUMBER:

CR

LHK

Is This Case Under Seal?

Yes No

NC

Total Number of Defendants:

1 2-7 8 or more

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 potential high-cost case?

Yes No

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

Yes No

Is this a RICO Act gang case?

Yes No

Assigned AUSA

(Lead Attorney): AUSA MICHAEL PITMAN Date Submitted: 7/13/17

Comments: