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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

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11	UNITED STATES OF AMERICA,	)	CRIMINAL INDICTMENT
12	Plaintiff,	)	SUPERSEDING
13	vs.	)	2:05-cr-121-RCJ-RJJ
14	ROBERT D. KAHRE,	)	Violations:
15	DANNIELLE R. ALIRES,	)	18 U.S.C. § 371 - Conspiracy to Attempt to Evade
16	JOEL R. AXBERG,	)	or Defeat Tax
17	MYRA L. BUONOMO,	)	18 U.S.C. § 1014 - False Statements to a Bank
18	ENRIQUE CEBALLOS,	)	26 U.S.C. § 7201 - Attempt to Evade or Defeat
19	ROBERT J. FURMAN,	)	Tax
20	JAMES M. GULLEY,	)	26 U.S.C. § 7202 - Willful Failure to Collect or
21	DONALD J. HAMILTON,	)	Pay Over Tax
22	DONALD W. HAMILTON,	)	26 U.S.C. § 7206(1) - Filing a False U.S.
23	JOHN W. KAHRE,	)	Individual Income Tax Return
24	LORI A. KAHRE,	)	42 U.S.C. § 408(a)(7)(B) - Misuse of a Social
25	ALEXANDER C. LOGLIA,	)	Security Number
	JOSE L. G. MATEOS,	)	
	MISTY D. MORGAN,	)	
	RICHARD J. POSER, SR.,	)	
	HEIDI J. RASMUSSEN,	)	
	DEBRA A. ROSENBAUM,	)	
	STEVEN T. ROSENBAUM,	)	
	RON RUGGLES,	)	
	THERESA H. WHITNEY,	)	
	WILLIAM A. WHITNEY	)	
	Defendants.	)	

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## SUMMARY OF CHARGES

Defendant	Count(s)	Charge
ROBERT D. KAHRE	1-107 187	26 U.S.C. § 7202 - Willful Failure to Collect or Pay Over Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
DANNIELLE R. ALIRES	108 109 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 1014 - False Statements to a Bank 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
JOEL R. AXBERG	110-114 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
MYRA L. BUONOMO	115-116 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
ENRIQUE CEBALLOS	117-121 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
ROBERT J. FURMAN	122-124 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
JAMES M. GULLEY	125-128 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
DONALD J. HAMILTON	129-133 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
DONALD W. HAMILTON	134-137 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
JOHN W. KAHRE	138 139-141 187	26 U.S.C. § 7206(1) - Filing a False U.S. Individual Income Tax Return 26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
LORI A. KAHRE	142-146 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
ALEXANDER C. LOGLIA	147-150 151 152-156 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 26 U.S.C. § 7206(1) - Filing a False U.S. Individual Income Tax Return 26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
JOSE L. G. MATEOS	157-158 159-162 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 42 U.S.C. § 408(a)(7)(B) - Misuse of a Social Security Number 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
MISTY D. MORGAN	163-164 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
RICHARD J. POSER, SR.	165-167 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
HEIDI J. RASMUSSEN	168-172 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
DEBRA A. ROSENBAUM and STEVEN T. ROSENBAUM	173-177 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
RON RUGGLES	178-181 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax
THERESA H. WHITNEY and WILLIAM A. WHITNEY	182-186 187	26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax 18 U.S.C. § 371 - Conspiracy to Attempt to Evade or Defeat Tax

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1 **THE GRAND JURY CHARGES THAT:**2 **COUNTS 1 - 107**

3 (Willful Failure to Collect or Pay Over Tax)

4 On or about the dates listed in the table below, in the State and Federal District of Nevada,

5 **ROBERT D. KAHRE,**

6 the defendant herein, a resident of Las Vegas, Nevada, conducted businesses as sole proprietorships under the  
 7 names: (1) Production Air Conditioning; (2) Production Electric; (3) Production Plumbing; (4) Sherman Tile  
 8 and Marble; (5) Union Pacific Construction; and (6) Wright Painting and Drywall, all with their principal place  
 9 of business in Las Vegas, Nevada. Wright Painting and Drywall operated divisions in Nevada and Texas. The  
 10 defendant herein, who had a duty to collect, truthfully account for, and pay over Federal Income Tax  
 11 Withholdings (FITW) and Federal Insurance Contributions Act (FICA) taxes, willfully failed to collect and  
 12 truthfully account for and pay over Federal Income Tax Withholdings (FITW) and Federal Insurance  
 13 Contributions Act (FICA) taxes to the Internal Revenue Service, from taxable wages paid to the employees of  
 14 his sole proprietorships, as detailed in the table below, all in violation of Title 26, United States Code, Section  
 15 7202. Each failure constitutes a separate violation (count) against ROBERT D. KAHRE.

16	<i>Count</i>	<i>Company</i>	<i>Offense Date</i>	<i>Quarter Ending</i>	<i>Approximate Total Taxable Wages</i>	<i>Approximate FICA not Withheld or Paid Over</i>	<i>Approximate FITW not Withheld or Paid Over</i>	<i>Approximate Total Harm (FICA plus FITW)</i>
17								
18	1	Production Air Conditioning	April 30, 1999	March 31, 1999	\$106,404.50	\$16,279.89	\$29,793.26	\$46,073.15
19	2	Production Plumbing	April 30, 1999	March 31, 1999	\$45,096.00	\$6,899.69	\$12,626.88	\$19,526.57
20	3	Sherman Tile and Marble	April 30, 1999	March 31, 1999	\$85,323.42	\$13,054.48	\$23,890.56	\$36,945.04
21	4	Wright Painting and Drywall (Texas)	April 30, 1999	March 31, 1999	\$13,369.00	\$2,045.46	\$3,743.32	\$5,788.78
22	5	Wright Painting and Drywall	April 30, 1999	March 31, 1999	\$327,248.00	\$50,068.94	\$91,629.44	\$141,698.38
23	6	Production Air Conditioning	July 31, 1999	June 30, 1999	\$123,633.50	\$18,915.93	\$34,617.38	\$53,533.31
24	7	Production Plumbing	July 31, 1999	June 30, 1999	\$49,862.00	\$7,628.89	\$13,961.36	\$21,590.25
25	8	Sherman Tile and Marble	July 31, 1999	June 30, 1999	\$164,477.00	\$25,164.98	\$46,053.56	\$71,218.54
26	9	Wright Painting and Drywall (Texas)	July 31, 1999	June 30, 1999	\$10,723.00	\$1,640.62	\$3,002.44	\$4,643.06

<i>Count</i>	<i>Company</i>	<i>Offense Date</i>	<i>Quarter Ending</i>	<i>Approximate Total Taxable Wages</i>	<i>Approximate FICA not Withheld or Paid Over</i>	<i>Approximate FITW not Withheld or Paid Over</i>	<i>Approximate Total Harm (FICA plus FITW)</i>
10	Wright Painting and Drywall	July 31, 1999	June 30, 1999	\$260,731.00	\$39,891.84	\$73,004.68	\$112,896.52
11	Production Air Conditioning	October 31, 1999	September 30, 1999	\$133,591.75	\$20,439.54	\$37,405.69	\$57,845.23
12	Production Plumbing	October 31, 1999	September 30, 1999	\$51,849.00	\$7,932.90	\$14,517.72	\$22,450.62
13	Sherman Tile and Marble	October 31, 1999	September 30, 1999	\$149,943.00	\$22,941.28	\$41,984.04	\$64,925.32
14	Wright Painting and Drywall (Texas)	October 31, 1999	September 30, 1999	\$66,216.00	\$10,131.05	\$18,540.48	\$28,671.53
15	Wright Painting and Drywall	October 31, 1999	September 30, 1999	\$270,556.00	\$41,395.07	\$75,755.68	\$117,150.75
16	Production Air Conditioning	January 31, 2000	December 31, 1999	\$168,870.00	\$25,837.11	\$47,283.60	\$73,120.71
17	Production Plumbing	January 31, 2000	December 31, 1999	\$81,544.00	\$12,476.23	\$22,832.32	\$35,308.55
18	Sherman Tile and Marble	January 31, 2000	December 31, 1999	\$98,549.00	\$15,078.00	\$27,593.72	\$42,671.72
19	Wright Painting and Drywall (Texas)	January 31, 2000	December 31, 1999	\$58,226.00	\$8,908.58	\$16,303.28	\$25,211.86
20	Wright Painting and Drywall	January 31, 2000	December 31, 1999	\$467,118.00	\$71,469.05	\$130,793.04	\$202,262.09
21	Production Air Conditioning	April 30, 2000	March 31, 2000	\$149,459.00	\$22,867.23	\$41,848.52	\$64,715.75
22	Production Plumbing	April 30, 2000	March 31, 2000	\$70,791.00	\$10,831.02	\$19,821.48	\$30,652.50
23	Sherman Tile and Marble	April 30, 2000	March 31, 2000	\$63,718.00	\$9,748.85	\$17,841.04	\$27,589.89
24	Wright Painting and Drywall (Texas)	April 30, 2000	March 31, 2000	\$44,174.00	\$6,758.62	\$12,368.72	\$19,127.34
25	Wright Painting and Drywall	April 30, 2000	March 31, 2000	\$575,208.00	\$88,006.82	\$161,058.24	\$249,065.06
26	Production Air Conditioning	July 31, 2000	June 30, 2000	\$152,376.50	\$23,313.60	\$42,665.42	\$65,979.02
27	Production Electric	July 31, 2000	June 30, 2000	\$10,909.00	\$1,669.08	\$3,054.52	\$4,723.60
28	Production Plumbing	July 31, 2000	June 30, 2000	\$67,290.00	\$10,295.37	\$18,841.20	\$29,136.57
29	Sherman Tile and Marble	July 31, 2000	June 30, 2000	\$69,873.00	\$10,690.57	\$19,564.44	\$30,255.01
30	Wright Painting and Drywall (Texas)	July 31, 2000	June 30, 2000	\$87,632.00	\$13,407.70	\$24,536.96	\$37,944.66
31	Wright Painting and Drywall	July 31, 2000	June 30, 2000	\$759,827.00	\$116,253.53	\$212,751.56	\$329,005.09
32	Production Air Conditioning	October 31, 2000	September 30, 2000	\$182,628.50	\$27,942.16	\$51,135.98	\$79,078.14
33	Production Electric	October 31, 2000	September 30, 2000	\$30,948.00	\$4,735.04	\$8,665.44	\$13,400.48
34	Production Plumbing	October 31, 2000	September 30, 2000	\$72,914.00	\$11,155.84	\$20,415.92	\$31,571.76

Count	Company	Offense Date	Quarter Ending	Approximate Total Taxable Wages	Approximate FICA not Withheld or Paid Over	Approximate FITW not Withheld or Paid Over	Approximate Total Harm (FICA plus FITW)	
1								
2	35	Sherman Tile and Marble	October 31, 2000	September 30, 2000	\$93,447.00	\$14,297.39	\$26,165.16	\$40,462.55
3	36	Wright Painting and Drywall (Texas)	October 31, 2000	September 30, 2000	\$51,266.00	\$7,843.70	\$14,354.48	\$22,198.18
4	37	Wright Painting and Drywall	October 31, 2000	September 30, 2000	\$747,321.00	\$114,340.11	\$209,249.88	\$323,589.99
5	38	Production Air Conditioning	January 31, 2001	December 31, 2000	\$178,141.50	\$27,255.65	\$49,879.62	\$77,135.27
6	39	Production Electric	January 31, 2001	December 31, 2000	\$30,154.00	\$4,613.56	\$8,443.12	\$13,056.68
7	40	Production Plumbing	January 31, 2001	December 31, 2000	\$71,423.00	\$10,927.72	\$19,998.44	\$30,926.16
8	41	Sherman Tile and Marble	January 31, 2001	December 31, 2000	\$58,069.00	\$8,884.56	\$16,259.32	\$25,143.88
9	42	Wright Painting and Drywall (Texas)	January 31, 2001	December 31, 2000	\$44,069.00	\$6,742.56	\$12,339.32	\$19,081.88
10	43	Wright Painting and Drywall	January 31, 2001	December 31, 2000	\$789,944.00	\$120,861.43	\$221,184.32	\$342,045.75
11	44	Production Air Conditioning	April 30, 2001	March 31, 2001	\$182,344.50	\$27,898.71	\$51,056.46	\$78,955.17
12	45	Production Electric	April 30, 2001	March 31, 2001	\$35,646.00	\$5,453.84	\$9,980.88	\$15,434.72
13	46	Production Plumbing	April 30, 2001	March 31, 2001	\$68,434.00	\$10,470.40	\$19,161.52	\$29,631.92
14	47	Sherman Tile and Marble	April 30, 2001	March 31, 2001	\$97,881.00	\$14,975.79	\$27,406.68	\$42,382.47
15	48	Wright Painting and Drywall (Texas)	April 30, 2001	March 31, 2001	\$49,323.00	\$7,546.42	\$13,810.44	\$21,356.86
16	49	Wright Painting and Drywall	April 30, 2001	March 31, 2001	\$1,662,227.00	\$254,320.73	\$465,423.56	\$719,744.29
17	50	Production Air Conditioning	July 31, 2001	June 30, 2001	\$152,651.00	\$23,355.60	\$42,742.28	\$66,097.88
18	51	Production Electric	July 31, 2001	June 30, 2001	\$38,156.00	\$5,837.87	\$10,683.68	\$16,521.55
19	52	Production Plumbing	July 31, 2001	June 30, 2001	\$93,921.00	\$14,369.91	\$26,297.88	\$40,667.79
20	53	Sherman Tile and Marble	July 31, 2001	June 30, 2001	\$165,406.00	\$25,307.12	\$46,313.68	\$71,620.80
21	54	Wright Painting and Drywall (Texas)	July 31, 2001	June 30, 2001	\$65,497.00	\$10,021.04	\$18,339.16	\$28,360.20
22	55	Wright Painting and Drywall	July 31, 2001	June 30, 2001	\$1,275,209.00	\$195,106.98	\$357,058.52	\$552,165.50
23	56	Production Air Conditioning	October 31, 2001	September 30, 2001	\$167,370.00	\$25,607.61	\$46,026.75	\$71,634.36
24	57	Production Electric	October 31, 2001	September 30, 2001	\$34,643.00	\$5,300.38	\$9,526.83	\$14,827.20
25	58	Production Plumbing	October 31, 2001	September 30, 2001	\$83,729.00	\$12,810.54	\$23,025.48	\$35,836.01
26	59	Sherman Tile and Marble	October 31, 2001	September 30, 2001	\$69,077.00	\$10,568.78	\$18,996.18	\$29,564.96

	<i>Count</i>	<i>Company</i>	<i>Offense Date</i>	<i>Quarter Ending</i>	<i>Approximate Total Taxable Wages</i>	<i>Approximate FICA not Withheld or Paid Over</i>	<i>Approximate FITW not Withheld or Paid Over</i>	<i>Approximate Total Harm (FICA plus FITW)</i>
1								
2	60	Wright Painting and Drywall (Texas)	October 31, 2001	September 30, 2001	\$105,551.00	\$16,149.30	\$29,026.53	\$45,175.83
3	61	Wright Painting and Drywall	October 31, 2001	September 30, 2001	\$1,189,707.00	\$182,025.17	\$327,169.43	\$509,194.60
4	62	Production Air Conditioning	January 31, 2002	December 31, 2001	\$186,738.00	\$28,570.91	\$51,352.95	\$79,923.86
5	63	Production Electric	January 31, 2002	December 31, 2001	\$37,647.00	\$5,759.99	\$10,352.93	\$16,112.92
6	64	Production Plumbing	January 31, 2002	December 31, 2001	\$150,377.00	\$23,007.68	\$41,353.68	\$64,361.36
7	65	Sherman Tile and Marble	January 31, 2002	December 31, 2001	\$127,095.00	\$19,445.54	\$34,951.13	\$54,396.66
8	66	Wright Painting and Drywall (Texas)	January 31, 2002	December 31, 2001	\$184,947.00	\$28,296.89	\$50,860.43	\$79,157.32
9	67	Wright Painting and Drywall	January 31, 2002	December 31, 2001	\$1,458,757.00	\$223,189.82	\$401,158.18	\$624,348.00
10	68	Production Air Conditioning	April 30, 2002	March 31, 2002	\$127,604.00	\$19,523.41	\$34,453.08	\$53,976.49
11	69	Production Electric	April 30, 2002	March 31, 2002	\$42,322.00	\$6,475.27	\$11,426.94	\$17,902.21
12	70	Production Plumbing	April 30, 2002	March 31, 2002	\$91,514.00	\$14,001.64	\$24,708.78	\$38,710.42
13	71	Sherman Tile and Marble	April 30, 2002	March 31, 2002	\$93,957.00	\$14,375.42	\$25,368.39	\$39,743.81
14	72	Wright Painting and Drywall (Texas)	April 30, 2002	March 31, 2002	\$108,312.00	\$16,571.74	\$29,244.24	\$45,815.98
15	73	Wright Painting and Drywall	April 30, 2002	March 31, 2002	\$1,166,266.00	\$178,438.70	\$314,891.82	\$493,330.52
16	74	Production Air Conditioning	July 31, 2002	June 30, 2002	\$155,418.00	\$23,778.95	\$41,962.86	\$65,741.81
17	75	Production Electric	July 31, 2002	June 30, 2002	\$29,267.00	\$4,477.85	\$7,902.09	\$12,379.94
18	76	Production Plumbing	July 31, 2002	June 30, 2002	\$114,057.00	\$17,450.72	\$30,795.39	\$48,246.11
19	77	Sherman Tile and Marble	July 31, 2002	June 30, 2002	\$141,110.00	\$21,589.83	\$38,099.70	\$59,689.53
20	78	Wright Painting and Drywall (Texas)	July 31, 2002	June 30, 2002	\$41,850.00	\$6,403.05	\$11,299.50	\$17,702.55
21	79	Wright Painting and Drywall	July 31, 2002	June 30, 2002	\$1,256,752.00	\$192,283.06	\$339,323.04	\$531,606.10
22	80	Production Air Conditioning	October 31, 2002	September 30, 2002	\$225,111.00	\$34,441.98	\$60,779.97	\$95,221.95
23	81	Production Electric	October 31, 2002	September 30, 2002	\$77,177.00	\$11,808.08	\$20,837.79	\$32,645.87
24	82	Production Plumbing	October 31, 2002	September 30, 2002	\$165,502.00	\$25,321.81	\$44,685.54	\$70,007.35
25	83	Sherman Tile and Marble	October 31, 2002	September 30, 2002	\$89,022.00	\$13,620.37	\$24,035.94	\$37,656.31
26	84	Union Pacific Construction	October 31, 2002	September 30, 2002	\$184,816.00	\$28,276.85	\$49,900.32	\$78,177.17

<i>Count</i>	<i>Company</i>	<i>Offense Date</i>	<i>Quarter Ending</i>	<i>Approximate Total Taxable Wages</i>	<i>Approximate FICA not Withheld or Paid Over</i>	<i>Approximate FITW not Withheld or Paid Over</i>	<i>Approximate Total Harm (FICA plus FITW)</i>
1							
2	85 Wright Painting and Drywall (Texas)	October 31, 2002	September 30, 2002	\$44,117.00	\$6,749.90	\$11,911.59	\$18,661.49
3	86 Wright Painting and Drywall	October 31, 2002	September 30, 2002	\$1,389,984.00	\$212,667.55	\$375,295.68	\$587,963.23
4	87 Production Air Conditioning	January 31, 2003	December 31, 2002	\$254,486.00	\$38,936.36	\$68,711.22	\$107,647.58
5	88 Production Electric	January 31, 2003	December 31, 2002	\$98,416.00	\$15,057.65	\$26,572.32	\$41,629.97
6	89 Production Plumbing	January 31, 2003	December 31, 2002	\$212,651.00	\$32,535.60	\$57,415.77	\$89,951.37
7	90 Sherman Tile and Marble	January 31, 2003	December 31, 2002	\$79,548.00	\$12,170.84	\$21,477.96	\$33,648.80
8	91 Union Pacific Construction	January 31, 2003	December 31, 2002	\$215,397.00	\$32,955.74	\$58,157.19	\$91,112.93
9	92 Wright Painting and Drywall (Texas)	January 31, 2003	December 31, 2002	\$49,750.00	\$7,611.75	\$13,432.50	\$21,044.25
10	93 Wright Painting and Drywall	January 31, 2003	December 31, 2002	\$1,576,231.00	\$241,163.34	\$425,582.37	\$666,745.71
11	94 Production Air Conditioning	April 30, 2003	March 31, 2003	\$177,316.00	\$27,129.35	\$44,329.00	\$71,458.35
12	95 Production Electric	April 30, 2003	March 31, 2003	\$78,815.00	\$12,058.70	\$19,703.75	\$31,762.45
13	96 Production Plumbing	April 30, 2003	March 31, 2003	\$169,657.00	\$25,957.52	\$42,414.25	\$68,371.77
14	97 Sherman Tile and Marble	April 30, 2003	March 31, 2003	\$84,931.00	\$12,994.44	\$21,232.75	\$34,227.19
15	98 Union Pacific Construction	April 30, 2003	March 31, 2003	\$211,309.00	\$32,330.28	\$52,827.25	\$85,157.53
16	99 Wright Painting and Drywall (Texas)	April 30, 2003	March 31, 2003	\$132,052.00	\$20,203.96	\$33,013.00	\$53,216.96
17	100 Wright Painting and Drywall	April 30, 2003	March 31, 2003	\$971,234.00	\$148,598.80	\$242,808.50	\$391,407.30
18	101 Production Air Conditioning	July 31, 2003	June 30, 2003	\$123,937.00	\$18,962.36	\$30,984.25	\$49,946.61
19	102 Production Electric	July 31, 2003	June 30, 2003	\$42,807.00	\$6,549.47	\$10,701.75	\$17,251.22
20	103 Production Plumbing	July 31, 2003	June 30, 2003	\$121,003.00	\$18,513.46	\$30,250.75	\$48,764.21
21	104 Sherman Tile and Marble	July 31, 2003	June 30, 2003	\$71,487.00	\$10,937.51	\$17,871.75	\$28,809.26
22	105 Union Pacific Construction	July 31, 2003	June 30, 2003	\$110,747.00	\$16,944.29	\$27,686.75	\$44,631.04
23	106 Wright Painting and Drywall (Texas)	July 31, 2003	June 30, 2003	\$45,144.00	\$6,907.03	\$11,286.00	\$18,193.03
24	107 Wright Painting and Drywall	July 31, 2003	June 30, 2003	\$383,985.00	\$58,749.71	\$95,996.25	\$154,745.96
25							
26							

**COUNT 108**

(Attempt to Evade or Defeat Tax)

During the calendar year 2002, in the State and Federal District of Nevada,

**DANNIELLE R. ALIRES,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat her income tax due and owing to the United States of America, by failing to file, on or before the statutory due date, an income tax return as required by law, with any proper officer of the Internal Revenue Service for the year 2002. DANNIELLE R. ALIRES, as she then and there well knew and believed, had taxable income for the said calendar year, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. DANNIELLE R. ALIRES attempted to conceal from all proper officers of the United States of America her true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report her true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages/ Income</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
108	2002	No	None	None	-	\$37,700.00	\$24,800.00	\$2,624.00

**COUNT 109**

(False Statements to a Bank)

On or about January 13, 2003, through on or about May 30, 2003, in the State and Federal District of Nevada,

**DANNIELLE R. ALIRES,**

the defendant herein, a resident of Las Vegas, Nevada, knowingly made a material false statement and report for the purpose of influencing the action of Bank of America, N.A., an institution the accounts of which were insured by the Federal Deposit Insurance Corporation, in connection with an application and loan for the purchase of real property located at 4411 E. Boston Avenue, Las Vegas, Nevada 89104, in that the defendant represented that she was a 2 year employee of Union Pacific Construction; that her 2001

1 wages from Union Pacific Construction were \$35,100; and, that she received Form W-2 Wage and Tax  
 2 Statements for 2001 and 2002 from Union Pacific Construction, when in truth and in fact, as the defendant  
 3 well knew, she was not a 2 year employee of Union Pacific Construction; that her 2001 wages from Union  
 4 Pacific Construction were \$2,500; and, that she did not receive Form W-2 Wage and Tax Statements for  
 5 2001 and 2002 from Union Pacific Construction, all in violation of Title 18, United States Code, Section  
 6 1014.

7  
 8 **COUNTS 110 - 114**  
 9 (Attempt to Evade or Defeat Tax)

10 During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of  
 11 Nevada,

12 **JOEL R. AXBERG,**

13 the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax  
 14 due and owing to the United States of America, by filing and causing to be filed with the Director, Internal  
 15 Revenue Service, a false and fraudulent U.S. Individual Income Tax Return for the year 1998, and by failing to  
 16 file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the  
 17 Internal Revenue Service for the years 1999, 2000, 2001 and 2002. JOEL R. AXBERG, as he then and there  
 18 well knew and believed, had taxable income for the said calendar years, upon which said taxable income was  
 19 owing to the United States of America, an additional income tax as detailed in the table below. JOEL R.  
 20 AXBERG attempted to conceal from all proper officers of the United States of America his true and correct  
 21 income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his  
 22 true and correct income, all in violation of Title 26, United States Code, Section 7201.

23

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
24 110	1998	Yes	1040A	Ogden	\$5,586.09	\$10,460.00	\$16,046.09	\$3,045.75
25 111	1999	No	None	None	-	\$39,645.00	\$27,795.00	\$3,666.00
26 112	2000	No	None	None	-	\$41,740.00	\$29,690.00	\$3,951.00

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
113	2001	No	None	None	-	\$41,600.00	\$29,150.00	\$3,276.00
114	2002	No	None	None	-	\$40,033.00	\$27,133.00	\$3,569.00

**COUNTS 115 - 116**

(Attempt to Evade or Defeat Tax)

During the calendar years 2001 and 2002, in the State and Federal District of Nevada,

**MYRA L. BUONOMO,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat her income tax due and owing to the United States of America, by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 2001 and 2002. MYRA L. BUONOMO, as she then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. MYRA L. BUONOMO attempted to conceal from all proper officers of the United States of America her true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report her true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
115	2001	No	None	None	-	\$23,400	\$15,950.00	\$2,096.00
116	2002	No	None	None	-	\$23,400	\$15,700.00	\$2,059.00

**COUNTS 117 - 121**

(Attempt to Evade or Defeat Tax)

During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**ENRIQUE CEBALLOS,**

1 the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax  
 2 due and owing to the United States of America, by filing and causing to be filed with the Director, Internal  
 3 Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1998, 1999, 2000,  
 4 2001 and 2002. ENRIQUE CEBALLOS, as he then and there well knew and believed, had taxable income for  
 5 the said calendar years, upon which said taxable income was owing to the United States of America, an  
 6 additional income tax as detailed in the table below. ENRIQUE CEBALLOS attempted to conceal from all  
 7 proper officers of the United States of America his true and correct income by conducting employment payroll  
 8 transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of  
 9 Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
117	1998	Yes	1040	Ogden	\$4,555.00	\$262,517.00	\$276,451.00	\$84,607.00
118	1999	Yes	1040	Ogden	\$14,890.00	\$307,536.00	\$334,142.00	\$104,250.00
119	2000	Yes	1040	Ogden	\$1,078.00	\$415,201.00	\$429,255.00	\$144,133.00
120	2001	Yes	1040EZ	Fresno	\$10,311.00	\$1,060,863.00	\$1,074,074.00	\$395,524.00
121	2002	Yes	1040EZ	Fresno	\$2,073.00	\$784,069.00	\$789,142.00	\$280,700.00

17  
 18 **COUNTS 122 - 124**

(Attempt to Evade or Defeat Tax)

19 During the calendar years 2000, 2001 and 2002, in the State and Federal District of Nevada,

20 **ROBERT J. FURMAN,**

21 the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax  
 22 due and owing to the United States of America, by filing and causing to be filed with the Director, Internal  
 23 Revenue Service, a false and fraudulent U.S. Individual Income Tax Return for the year 2000, and by failing to  
 24 file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the  
 25 Internal Revenue Service for the years 2001 and 2002. ROBERT J. FURMAN, as he then and there well knew  
 26 and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the

United States of America, an additional income tax as detailed in the table below. ROBERT J. FURMAN attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
122	2000	Yes	1040	Ogden	\$13,376.00	\$18,965.00	\$32,341.00	\$2,843.00
123	2001	No	None	None	-	\$22,292.00	\$15,592.00	\$2,026.00
124	2002	No	None	None	-	\$32,207.00	\$25,282.00	\$3,722.00

**COUNTS 125 - 128**

(Attempt to Evade or Defeat Tax)

During the calendar years 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**JAMES M. GULLEY,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by filing and causing to be filed with the Director, Internal Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1999, 2000, 2001 and 2002. JAMES M. GULLEY, as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. JAMES M. GULLEY attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
125	1999	Yes	1040X	Ogden	\$(231.00)	\$47,134.00	\$46,903.00	\$7,543.00
126	2000	Yes	1040A	Ogden	\$(9,139.00)	\$32,102.00	\$22,963.00	\$3,446.00

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
127	2001	Yes	1040EZ	Ogden	\$(1,883.00)	\$27,503.00	\$25,620.00	\$3,844.00
128	2002	Yes	1040EZ	Ogden	\$10,089.00	\$4,740.00	\$14,829.00	\$616.00

**COUNTS 129 - 133**

(Attempt to Evade or Defeat Tax)

During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**DONALD J. HAMILTON,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by filing and causing to be filed with the Director, Internal Revenue Service, a false and fraudulent U.S. Individual Income Tax Return for the year 1999, and by failing to file, on or before the statutory due date, tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 1998, 2000, 2001 and 2002. DONALD J. HAMILTON, as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. DONALD J. HAMILTON attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
129	1998	No	None	None	-	\$22,385.00	\$15,435.00	\$2,314.00
130	1999	Yes	1040	Ogden	\$3,856.00	\$25,608.00	\$29,464.00	\$3,840.00
131	2000	No	None	None	-	\$25,351.00	\$18,876.00	\$2,040.00
132	2001	No	None	None	-	\$27,059.00	\$20,360.00	\$2,042.00
133	2002	No	None	None	-	\$28,639.00	\$21,714.00	\$2,959.00

**COUNTS 134 - 137**

(Attempt to Evade or Defeat Tax)

During the calendar years 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**DONALD W. HAMILTON,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by filing and causing to be filed with the Director, Internal Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1999 and 2000, and by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 2001 and 2002. DONALD W. HAMILTON, as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. DONALD W. HAMILTON attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
134	1999	Yes	1040PC	Ogden	\$14,199.00	\$10,749.00	\$24,948.00	\$1,613.00
135	2000	Yes	1040EZ	Ogden	(\$7,200)	\$23,793.00	\$16,593.00	\$2,486.00
136	2001	No	None	None	-	\$34,302.00	\$26,852.00	\$3,731.00
137	2002	No	None	None	-	\$39,441.00	\$31,741.00	\$4,912.00

**COUNT 138**

(Fraud and False Statement)

On or about April 15, 2000, in the State and Federal District of Nevada,

**JOHN W. KAHRE,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully make and subscribe a 1999 U.S. Individual Income Tax Return, Form 1040A, which was verified by a written declaration that it was made

under the penalties of perjury, and was filed with the Director, Internal Revenue Service, at Ogden, Utah, which said 1999 U.S. Individual Income Tax Return, Form 1040A, JOHN W. KAHRE did not believe to be true and correct as to every material matter in that the said 1999 U.S. Individual income Tax Return, Form 1040A, reported wages on line 7, of \$130, whereas, as he then and there well knew and believed, his wages on Form 1040A, line 7, should have been in truth and in fact at least \$27,130, all in violation of title 26, United States Code, Section 7206(1).

**COUNTS 139 - 141**  
(Attempt to Evade or Defeat Tax)

During the calendar years 2000, 2001 and 2002, in the State and Federal District of Nevada,

**JOHN W. KAHRE,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 2000, 2001 and 2002. JOHN W. KAHRE, as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. JOHN W. KAHRE attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
139	2000	No	None	None	-	\$31,250.00	\$16,400.00	\$1,464.00
140	2001	No	None	None	-	\$32,300.00	\$16,950.00	\$846.00
141	2002	No	None	None	-	\$36,463.00	\$20,563.00	\$1,986.00

**COUNTS 142 - 146**

(Attempt to Evade or Defeat Tax)

During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**LORI A. KAHRE,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat her income tax due and owing to the United States of America, by filing and causing to be filed with the Director, Internal Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1998 and 1999, and by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 2000, 2001 and 2002. LORI A. KAHRE, as she then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. LORI A. KAHRE attempted to conceal from all proper officers of the United States of America her true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report her true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
142	1998	Yes	1040	Ogden	\$32,384.00	\$25,752.00	\$58,322.00	\$5,970.00
143	1999	Yes	1040	Ogden	\$25,766.00	\$28,985.00	\$54,751.00	\$5,875.00
144	2000	No	None	None	-	\$31,800.00	\$24,600.00	\$3,694.00
145	2001	No	None	None	-	\$31,200.00	\$23,750.00	\$3,266.00
146	2002	No	None	None	-	\$31,200.00	\$23,500.00	\$3,229.00

**COUNT 147**

(Attempt to Evade or Defeat Tax)

From on or about October 10, 1997, to on or about May 20, 2003, in the State and Federal District of Nevada,

**ALEXANDER C. LOGLIA,**

1 the defendant herein, a resident of Las Vegas, Nevada, knowing that he owed federal income tax, did willfully  
2 attempt to evade and defeat the payment of the income tax due and owing by him to the United States of  
3 America for the calendar year 1993, in the amount of \$4,383, by concealing and attempting to conceal from the  
4 Internal Revenue Service his income earned for the years 1997 through 2003, by conducting employment  
5 payroll transactions in gold, silver and/or cash, and by filing a frivolous U.S. Individual Income Tax Return for  
6 the calendar year 1993 that reported zero income, all in violations of Title 26, United States Code, Section  
7 7201.

**COUNT 148**

(Attempt to Evade or Defeat Tax)

8  
9  
10 From on or about October 10, 1997, to on or about May 20, 2003, in the State and Federal District of  
11 Nevada,

**ALEXANDER C. LOGLIA,**

12  
13 the defendant herein, a resident of Las Vegas, Nevada, knowing that he owed federal income tax, did willfully  
14 attempt to evade and defeat the payment of the income tax due and owing by him to the United States of  
15 America for the calendar year 1994, in the amount of \$6,796, by concealing and attempting to conceal from the  
16 Internal Revenue Service his income earned for the years 1997 through 2003, by conducting employment  
17 payroll transactions in gold, silver and/or cash, and by filing a frivolous U.S. Individual Income Tax Return for  
18 the calendar year 1994 that reported zero income, all in violations of Title 26, United States Code, Section  
19 7201.

**COUNT 149**

(Attempt to Evade or Defeat Tax)

20  
21  
22 From on or about October 10, 1997, to on or about May 20, 2003, in the State and Federal District of  
23 Nevada,

**ALEXANDER C. LOGLIA,**

24  
25 the defendant herein, a resident of Las Vegas, Nevada, knowing that he owed federal income tax, did willfully  
26 attempt to evade and defeat the payment of the income tax due and owing by him to the United States of

1 America for the calendar year 1995, in the amount of \$8,640, by concealing and attempting to conceal from the  
2 Internal Revenue Service his income earned for the years 1997 through 2003, by conducting employment  
3 payroll transactions in gold, silver and/or cash, and by filing a frivolous U.S. Individual Income Tax Return for  
4 the calendar year 1995 that reported zero income, all in violations of Title 26, United States Code, Section  
5 7201.

6 **COUNT 150**

7 (Attempt to Evade or Defeat Tax)

8 From on or about October 10, 1997, to on or about May 20, 2003, in the State and Federal District of  
9 Nevada,

10 **ALEXANDER C. LOGLIA,**

11 the defendant herein, a resident of Las Vegas, Nevada, knowing that he owed federal income tax, did willfully  
12 attempt to evade and defeat the payment of the income tax due and owing by him to the United States of  
13 America for the calendar year 1996, in the amount of \$8,699, by concealing and attempting to conceal from the  
14 Internal Revenue Service his income earned for the years 1997 through 2003, by conducting employment  
15 payroll transactions in gold, silver and/or cash, and by filing a frivolous U.S. Individual Income Tax Return for  
16 the calendar year 1996 that reported zero income, all in violations of Title 26, United States Code, Section  
17 7201.

18 **COUNT 151**

19 (Fraud and False Statement)

20 On or about August 11, 2004, in the State and Federal District of Nevada,

21 **ALEXANDER C. LOGLIA,**

22 the defendant herein, a resident of Las Vegas, Nevada, did willfully make and subscribe a 1997 U.S.  
23 Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made  
24 under the penalties of perjury and was received by the Internal Revenue Service, at Fresno, California,  
25 which said 1997 U.S. Individual Income Tax Return, Form 1040, ALEXANDER C. LOGLIA did not  
26 believe to be true and correct as to every material matter in that the said 1997 U.S. Individual income Tax  
Return, Form 1040, reported wages on line 7, of \$43,267, whereas, as he then and there well knew and

believed, his wages on Form 1040, line 7, should have been in truth and in fact at least \$50,923, all in violation of title 26, United States Code, Section 7206(1).

**COUNTS 152 - 156**

(Attempt to Evade or Defeat Tax)

During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**ALEXANDER C. LOGLIA,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 1998, 1999, 2000, 2001 and 2002. ALEXANDER C. LOGLIA, as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. ALEXANDER C. LOGLIA attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
152	1998	No	None	None	-	\$38,896.00	\$31,946.00	\$5,644.00
153	1999	No	None	None	-	\$54,744.00	\$47,694.00	\$10,002.00
154	2000	No	None	None	-	\$60,333.00	\$53,133.00	\$11,463.00
155	2001	No	None	None	-	\$62,492.00	\$55,042.00	\$11,451.00
156	2002	No	None	None	-	\$72,424.00	\$64,724.00	\$13,822.00

**COUNTS 157 - 158**

(Attempt to Evade or Defeat Tax)

During the calendar years 2001 and 2002, in the State and Federal District of Nevada,

**JOSE L.G. MATEOS,**  
 aka, Jose L. Gonzalez,  
 aka, Chilango Gonzalez, and,  
 aka Luis Gonzalez

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 2001 and 2002. JOSE L.G. MATEOS, as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. JOSE L. G. MATEOS attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
157	2001	No	None	None	-	\$120,874.00	\$107,372.00	\$27,101.00
158	2002	No	None	None	-	\$374,655.00	\$369,955.00	\$119,001.00

**COUNTS 159 - 162**

(Misuse of a Social Security Number)

During the calendar years 2000, 2001, 2002 and 2004, in the State and Federal District of Nevada,

**JOSE L.G. MATEOS,**  
 aka, Jose L. Gonzalez,  
 aka, Chilango Gonzalez, and,  
 aka Luis Gonzalez

the defendant herein, a resident of Las Vegas, Nevada, for the purpose of obtaining something of value, as listed in the table below, and for other purposes, and with the intent to deceive, falsely represented, to the

1 entities listed in the table below, that number XXX-XX-1627 was the Social Security Number assigned to him  
 2 by the Commissioner of Social Security, when in fact, as he well knew, such number was not the Social  
 3 Security Number assigned to him by the Commissioner, all in violation of Title 42, United States Code, Section  
 4 408(a)(7)(B).  
 5 . . . .

Count	Date (on or about)	Social Security Number	Name	Entity	Approximate Amount of Loan
159	July 26, 2000	XXX-XX-1627	Jose Luis Mateos	Universal Mortgage Corporation/ Bank of America Mortgage	\$119,716.00
160	March 08, 2001	XXX-XX-1627	Jose Luis Mateos	Toyota Motor Credit Company	\$34,144.00
161	March 30, 2002	XXX-XX-1627	Jose Luis Gonzalez	Ford Motor Credit	\$20,483.00
162	October 23, 2004	XXX-XX-1627	Jose Luis Gonzalez	Ford Motor Credit	\$21,933.00

11  
 12 **COUNTS 163 - 164**  
 13 (Attempt to Evade or Defeat Tax)

14 During the calendar years 1998 and 1999, in the State and Federal District of Nevada,

15 **MISTY D. MORGAN,**

16 the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat her income tax  
 17 due and owing to the United States of America, by filing and causing to be filed with the Director, Internal  
 18 Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1998 and 1999.  
 19 MISTY D. MORGAN, as she then and there well knew and believed, had taxable income for the said calendar  
 20 years, upon which said taxable income was owing to the United States of America, an additional income tax as  
 21 detailed in the table below. MISTY D. MORGAN attempted to conceal from all proper officers of the United  
 22 States of America her true and correct income by conducting employment payroll transactions in gold, silver  
 23 and/or cash, and by failing to report her true and correct income, all in violation of Title 26, United States Code,  
 24 Section 7201.

Count	Year	Return Filed	Form	IRS Service Center	Taxable Income Per Return	Approximate Unreported Wages	Approximate Corrected Taxable Income	Approximate Tax Due and Owing
163	1998	Yes	1040EZ	Ogden	\$3,802.00	\$16,136.00	\$19,938.00	\$2,415.00

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
164	1999	Yes	1040	Ogden	\$27,360.00	\$8,992.00	\$36,352.00	\$1,588.00

**COUNTS 165 - 167**

(Attempt to Evade or Defeat Tax)

During the calendar years 2000, 2001 and 2002, in the State and Federal District of Nevada,

**RICHARD J. POSER, SR.,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 2000, 2001 and 2002. RICHARD J. POSER, SR., as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. RICHARD J. POSER, SR. attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
165	2000	No	None	None	-	\$32,125.00	\$24,925.00	\$3,739.00
166	2001	No	None	None	-	\$51,792.00	\$44,342.00	\$8,508.00
167	2002	No	None	None	-	\$54,066.00	\$46,366.00	\$8,867.00

**COUNTS 168 - 172**

(Attempt to Evade or Defeat Tax)

During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**HEIDI J. RASMUSSEN,**

1 the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat her income tax  
 2 due and owing to the United States of America, by filing and causing to be filed with the Director, Internal  
 3 Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1998, 1999, 2000,  
 4 2001 and 2002. HEIDI J. RASMUSSEN, as she then and there well knew and believed, had taxable income for  
 5 the said calendar years, upon which said taxable income was owing to the United States of America, an  
 6 additional income tax as detailed in the table below. HEIDI J. RASMUSSEN attempted to conceal from all  
 7 proper officers of the United States of America her true and correct income by conducting employment payroll  
 8 transactions in gold, silver and/or cash, and by failing to report her true and correct income, all in violation of  
 9 Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
168	1998	Yes	1040	Ogden	\$21,020.00	\$24,694.00	\$45,714.00	\$4,144.00
169	1999	Yes	1040	Ogden	\$20,037.00	\$30,340.00	\$50,377.00	\$5,505.00
170	2000	Yes	1040	Ogden	\$24,783.00	\$33,280.00	\$58,729.00	\$7,027.00
171	2001	Yes	1040	Ogden	\$16,250.00	\$33,330.00	\$50,246.00	\$5,721.00
172	2002	Yes	1040	Ogden	\$12,522.00	\$35,320.00	\$48,549.00	\$5,619.00

**COUNTS 173 - 177**

(Attempt to Evade or Defeat Tax)

During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**DEBRA A. ROSENBAUM and  
STEVEN T. ROSENBAUM,**

the defendants herein, residents of Las Vegas, Nevada, did willfully attempt to evade and defeat their income tax due and owing to the United States of America, by filing and causing to be filed with the Director, Internal Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1998, 1999, 2000, 2001 and 2002. DEBRA A. ROSENBAUM and STEVEN T. ROSENBAUM, as they then and there well knew

and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. DEBRA A. ROSENBAUM and STEVEN T. ROSENBAUM attempted to conceal from all proper officers of the United States of America their true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report their true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
173	1998	Yes	1040	Ogden	\$60,254.00	\$26,856.00	\$87,110.00	\$7,518.00
174	1999	Yes	1040	Ogden	\$60,988.00	\$32,265.00	\$93,253.00	\$9,044.00
175	2000	Yes	1040	Ogden	\$42,420.00	\$36,520.00	\$79,645.00	\$10,431.00
176	2001	Yes	1040	Ogden	\$56,966.00	\$35,880.00	\$93,564.00	\$10,065.00
177	2002	Yes	1040	Ogden	\$64,124.00	\$38,033.00	\$102,157.00	\$10,768.00

**COUNTS 178 - 181**  
(Attempt to Evade or Defeat Tax)

During the calendar years 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**RON RUGGLES,**

the defendant herein, a resident of Las Vegas, Nevada, did willfully attempt to evade and defeat his income tax due and owing to the United States of America, by failing to file, on or before the statutory due date, income tax returns as required by law, with any proper officer of the Internal Revenue Service for the years 1999, 2000, 2001 and 2002. RON RUGGLES, as he then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. RON RUGGLES attempted to conceal from all proper officers of the United States of America his true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report his true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
178	1999	No	None	None	-	\$18,520.00	\$12,170.00	\$1,826.00
179	2000	No	None	None	-	\$25,583.00	\$19,108.00	\$2,869.00
180	2001	No	None	None	-	\$34,318.00	\$27,618.00	\$4,472.00
181	2002	No	None	None	-	\$36,390.00	\$29,465.00	\$4,856.00

**COUNTS 182 - 186**

(Attempt to Evade or Defeat Tax)

During the calendar years 1998, 1999, 2000, 2001 and 2002, in the State and Federal District of Nevada,

**THERESA H. WHITNEY and  
WILLIAM A. WHITNEY,**

the defendants herein, residents of Las Vegas, Nevada, did willfully attempt to evade and defeat their income tax due and owing to the United States of America, by filing and causing to be filed with the Director, Internal Revenue Service, false and fraudulent U.S. Individual Income Tax Returns for the years 1998, 1999, 2000, 2001 and 2002. THERESA H. WHITNEY and WILLIAM A. WHITNEY, as they then and there well knew and believed, had taxable income for the said calendar years, upon which said taxable income was owing to the United States of America, an additional income tax as detailed in the table below. THERESA H. WHITNEY and WILLIAM A. WHITNEY attempted to conceal from all proper officers of the United States of America their true and correct income by conducting employment payroll transactions in gold, silver and/or cash, and by failing to report their true and correct income, all in violation of Title 26, United States Code, Section 7201.

<i>Count</i>	<i>Year</i>	<i>Return Filed</i>	<i>Form</i>	<i>IRS Service Center</i>	<i>Taxable Income Per Return</i>	<i>Approximate Unreported Wages</i>	<i>Approximate Corrected Taxable Income</i>	<i>Approximate Tax Due and Owing</i>
182	1998	Yes	1040A	Ogden	\$(13,350.00)	\$52,257.00	\$44,708.00	\$7,018.00
183	1999	Yes	1040A	Ogden	\$(13,550.00)	\$57,286.00	\$53,956.00	\$9,517.00
184	2000	Yes	1040	Ogden	\$(11,800.00)	\$66,712.00	\$71,594.00	\$14,341.00
185	2001	Yes	1040	Ogden	\$9,594.00	\$78,844.00	\$105,064.00	\$21,687.00
186	2002	Yes	1040	Fresno	\$(14,750.00)	\$87,193.00	\$90,181.00	\$18,143.00

**COUNT 187**

(Conspiracy to Attempt to Evade or Defeat Tax)

That from at least on or about October 10, 1997, through and including April 4, 2006, within the State and Federal District of Nevada, and elsewhere, the defendants,

**ROBERT D. KAHRE,  
DANNIELLE R. ALIRES,  
JOEL R. AXBERG,  
MYRA L. BUONOMO,  
ENRIQUE CEBALLOS,  
ROBERT J. FURMAN,  
JAMES M. GULLEY,  
DONALD J. HAMILTON,  
DONALD W. HAMILTON,  
JOHN W. KAHRE,  
LORI A. KAHRE,  
ALEXANDER C. LOGLIA,  
JOSE L. G. MATEOS,  
MISTY D. MORGAN,  
RICHARD J. POSER, SR.,  
HEIDI J. RASMUSSEN,  
DEBRA A. ROSENBAUM,  
STEVEN T. ROSENBAUM,  
RON RUGGLES,  
THERESA H. WHITNEY, and  
WILLIAM A. WHITNEY**

together and with each other and with other persons both known and unknown to the Grand Jury, did unlawfully, willfully, and knowingly combine, conspire, confederate and agree among themselves and each other to commit certain offenses against the United States as follows: to willfully attempt in any manner to evade or defeat any tax imposed by this title [Title 26 Internal Revenue Code] or the payment thereof, in violation of 26 U.S.C. § 7201.

**MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that defendant, **ROBERT D. KAHRE**, during calendar years 1997 through 2003, paid wages to his employees, and to employees of other businesses with which he contracted to handle their payroll, in gold, silver and/or cash, which was taxable income to said employees when received; that upon said taxable income there was owing to the United States of America an income tax; and that the defendants,



1 (c) Defendant JOEL R. AXBERG received approximately \$190,338 in cash wages from  
defendant ROBERT D. KAHRE between the years 1998 through 2003.

2 (d) Defendant MYRA L. BUONOMO received approximately \$106,836 in cash wages from  
3 defendant ROBERT D. KAHRE between the years 1998 through 2003.

4 (e) Defendant ENRIQUE CEBALLO, received approximately \$3,131,519 in cash wages from  
5 defendant ROBERT D. KAHRE between the years 1998 through 2003.

6 (f) Defendant ROBERT J. FURMAN received approximately \$157,488 in cash wages from  
7 defendant ROBERT D. KAHRE between the years 2000 through 2003.

8 (g) Defendant JAMES M. GULLEY received approximately \$119,540 in cash wages from  
9 defendant ROBERT D. KAHRE between the years 1999 through 2003.

10 (h) Defendant DONALD J. HAMILTON received approximately \$146,726 in cash wages  
11 from defendant ROBERT D. KAHRE between the years 1998 through 2003.

12 (i) Defendant DONALD W. HAMILTON received approximately \$122,923 in cash wages  
13 from defendant ROBERT D. KAHRE between the years 1999 through 2003.

14 (j) Defendant JOHN W. KAHRE received approximately \$137,720 in cash wages from  
15 defendant ROBERT D. KAHRE between the years 1998 through 2003.

16 (k) Defendant LORI A. KAHRE received approximately \$160,937 in cash wages from  
17 defendant ROBERT D. KAHRE between the years 1998 through 2003.

18 (l) Defendant ALEXANDER C. LOGLIA received approximately \$326,348 in cash wages  
19 from defendant ROBERT D. KAHRE between the years 1997 through 2003.

20 (m) Defendant , JOSÉ L. G. MATEOS received approximately \$628,674 in cash wages from  
21 defendant ROBERT D. KAHRE between the years 2000 through 2003.

22 (n) Defendant MISTY D. MORGAN received approximately \$25,128 in cash wages from  
23 defendant ROBERT D. KAHRE between the years 1998 through 1999.

24 (o) Defendant RICHARD J. POSER, SR. received approximately \$161,916 in cash wages  
25 from defendant ROBERT D. KAHRE between the years 2000 through 2003.  
26

1 (p) Defendant HEIDI J. RASMUSSEN received approximately \$170,964 in cash wages from  
2 defendant ROBERT D. KAHRE between the years 1998 through 2003.

3 (q) Defendants DEBRA A. ROSENBAUM and STEVEN T. ROSENBAUM, received  
4 approximately \$184,554 in cash wages from defendant ROBERT D. KAHRE between the years 1998  
5 through 2003.

6 (r) Defendant RON RUGGLES received approximately \$227,017 in cash wages from  
7 defendant ROBERT D. KAHRE between the years 1999 through 2003.

8 (s) Defendant THERESA H. WHITNEY received approximately \$87,955 in cash wages from  
9 defendant ROBERT D. KAHRE between the years 1998 through 2003.

10 (t) Defendant WILLIAM A. WHITNEY received approximately \$295,088 in cash wages  
11 from defendant ROBERT D. KAHRE between the years 1998 through 2003.

12 All in violation of 18, United States Code, Section 371 and 26, United States Code, Section  
13 7201.

14 **DATED:** this 4<sup>th</sup> day of April 2006.

15 **A TRUE BILL:**

16 /s/  
17 FOREPERSON OF THE GRAND JURY

18 DANIEL G. BOGDEN  
19 United States Attorney

20 

21 J. GREGORY DAMM  
22 Assistant United States Attorney  
23 Organized Crime Strike Force  
24  
25  
26