



1 **COUNT 1**

2 **OREGON PERSONAL INCOME TAX EVASION**

3 **ORS 314.075/314.991 (F/C)**

4 The defendant on or about April 15, 2009, did unlawfully and knowingly, and with intent  
5 to evade the requirements of law imposing taxes upon or measured by net income, fail to make,  
6 sign, verify a return, or supply any information required, to wit: Oregon Individual Income Tax  
7 Return for the year 2008. Said acts or omissions constituting a crime committed against the  
8 Oregon Department of Revenue located in Marion County, Oregon.

9  
10 **COUNT 2**

11 **OREGON PERSONAL INCOME TAX EVASION**

12 **ORS 314.075/314.991 (F/C)**

13 In an act of the same or similar character as alleged in count 1 above, but in a separate  
14 criminal episode, the defendant on or about April 15, 2008, did unlawfully and knowingly, and  
15 with intent to evade the requirements of law imposing taxes upon or measured by net income,  
16 fail to make, sign, or verify a return, or supply any information required, to wit: Oregon  
17 Individual Income Tax Return for the year 2007. Said acts or omissions constituting a crime  
18 committed against the Oregon Department of Revenue located in Marion County, Oregon.

19  
20 **COUNT 3**

21 **OREGON PERSONAL INCOME TAX EVASION**

22 **ORS 314.075/314.991 (F/C)**

23 In an act of the same or similar character as alleged in counts 1 and 2 above, but in a  
24 separate criminal episode, the defendant on or about April 15, 2007, did unlawfully and  
25 knowingly, and with intent to evade the requirements of law imposing taxes upon or measured  
26 by net income, fail to make, sign, or verify a return, or supply any information required, to wit:

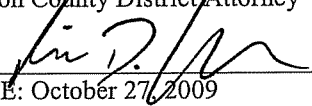
1 Oregon Individual Income Tax Return for the year 2006. Said acts or omissions constituting a  
2 crime committed against the Oregon Department of Revenue located in Marion County, Oregon.

3  
4 WITNESSES: All Witnesses appeared  
in person unless otherwise noted.  
5 T. Stinnette – OR, DOR

A TRUE BILL

  
Grand Jury Foreperson

6 WALTER M. BEGLAU  
7 Marion County District Attorney

8 By   
DATE: October 27, 2009

9 ADC/OSB #022647: DM

10 IT IS ORDERED that a warrant be issued for  
the arrest of the defendant, bail being set in the  
amount of:

11 \$ \_\_\_\_\_

12 \_\_\_\_\_  
Date

13 \_\_\_\_\_  
Judge

14 Arresting Agency Name: DOJ

Case #: COC0009-09

15 IDENTIFIERS: W/M Ht: 602 Wt: 239 Hair: Brown Eyes: Blue DOB: 06/02/1951

16 \_\_\_\_\_  
Clerk of the Circuit Court

17 By: \_\_\_\_\_  
18 Deputy