

1 KEVIN V. RYAN (CASBN 118321)
2 United States Attorney

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FILED

AUG 15 2006

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

SEALED
BY COURT ORDER

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

SI

11
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 PRISCILLA HUNTER,
16 MICHELLE CAMPBELL,
17 IRIS MARTINEZ,
18 MICHAEL HUNTER,
19 DARLENE CRABTREE, and
20 ALLAN CRABTREE, and
21 FRED NAREDO,

22 Defendants.

CR 06

0565

VIOLATIONS: 18 U.S.C. § 371 –
Conspiracy;
18 U.S.C. § 1167(b) – Misapplication of
Funds Belonging to a Gaming Establishment
on Indian Lands;
18 U.S.C. § 1519 – Obstruction of Justice;
26 U.S.C. § 7201 – Tax Evasion;
26 U.S.C. § 7203 – Failure to File Tax
Return;
18 U.S.C. § 2 – Aiding and Abetting

SAN FRANCISCO VENUE

23 INDICTMENT

24 The Grand Jury charges:

25 INTRODUCTORY ALLEGATIONS

26 At all times relevant to the charges set forth in this Indictment:

27 1. The Coyote Valley Band of Pomo Indians (hereafter “the Tribe”) was a tribe, band
28 and community of Indians subject to the laws of the United States relating to Indian affairs and
recognized by the Bureau of Indian Affairs as a “Federally Acknowledged Tribe.” The Tribe’s

1 reservation was located in Mendocino County, California.

2 2. The Tribe's governing body, the Tribal Council, was comprised of seven
3 members: the Chairperson, Vice-Chairperson, Secretary, Treasurer, Historian, and two Members-
4 at-Large.

5 3. Between January 1995 and December 2004:

6 a. Defendant PRISCILLA HUNTER was the Chairperson of the Tribe.

7 b. Defendant IRIS MARTINEZ was the Vice-Chairperson of the Tribe.

8 c. Defendant DARLENE CRABTREE was the Secretary of the Tribe.

9 d. Defendant MICHELLE CAMPBELL was the Treasurer of the Tribe.

10 e. Defendant MICHAEL HUNTER was the Historian of the Tribe.

11 f. Defendant FRED NAREDO was a Member-at-Large of the Council.

12 g. Defendant ALLAN CRABTREE was a Member-at-Large of the Council.

13 4. Coyote Valley Shodakai Casino (hereafter "the Casino") was a casino located on
14 the Tribe's reservation. The Casino was a gaming establishment operated by the Tribe pursuant
15 to an ordinance and resolution (the "Gaming Ordinance") approved by the National Indian
16 Gaming Commission ("NIGC").

17 5. At all relevant times, the Tribe's use of revenue generated by the Casino was
18 governed by Title 25, United States Code, Section 2710, Title 25, Code of Federal Regulations,
19 Section 522.4(b)(2), and by the Gaming Ordinance. These authorities prohibited the use of net
20 revenues from any tribal gaming for any purpose other than to fund tribal government operations
21 or programs; to provide for the general welfare of the Tribe and its members; to promote tribal
22 economic development; to donate to charitable organizations; or to help fund operations of local
23 government agencies.

24 6. The Gaming Ordinance required fifty percent of the Tribe's net gaming revenue
25 generated by the Casino to be distributed periodically to the Tribe's membership in the form of
26 per capita payments, with the other fifty percent to be allocated for designated purposes.

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1 COUNT ONE: (18 U.S.C. § 371 – Conspiracy to Steal and Misapply Tribal and Casino Funds)

2 7. Paragraphs 1 through 6 are realleged and incorporated here as if they were set
3 forth in full.

4 8. Beginning on a date unknown to the grand jury, but no later than May 2001, and
5 continuing to in or around December 2004, in the Northern District of California and elsewhere,
6 the defendants

7 PRISCILLA HUNTER,
8 MICHELLE CAMPBELL,
9 IRIS MARTINEZ, and
MICHAEL HUNTER,

10 and others known and unknown to the grand jury, did knowingly and intentionally conspire to
11 commit an offense against the United States, specifically, theft and misapplication of funds of a
12 value in excess of \$1,000 from an Indian tribal organization, in violation of Title 18, United
13 States Code, Section 1163, and theft and misapplication of funds of a value in excess of \$1,000
14 belonging to a gaming establishment on Indian lands, in violation of Title 18, United States
15 Code, Section 1167(b).

16 Background Allegations

17 A. American Express Accounts and NIGC Settlement

18 9. In 1997, each member of the Tribal Council was issued an American Express
19 Corporate (“AMEX”) credit card in the name of the Casino. Between 1997 and July of 2000, the
20 monthly AMEX bill for each Tribal Council member’s purchases on his or her card was paid out
21 of the Casino’s operating account.

22 10. In May 2001, the NIGC and the Tribe reached a Settlement Agreement (the
23 “Agreement”). In the Agreement, the Tribe and NIGC determined that deficiencies in the Tribe’s
24 accounting system, internal controls and policies and procedures contributed to the improper uses
25 of gaming revenues by the Tribal Council. The Agreement included an acknowledgment that
26 Casino assets had been diverted before they were distributed according to the Tribe’s revenue
27 distribution plan. The Agreement also included an acknowledgment that, among other things,
28 “[f]rom 1997 until February of 2000, members of the Tribal Council used the Casino-issued

1 American Express Corporate Cards for personal expenditures such as vacations and personal
2 items such as gifts, clothing, toys and automobile tires.”

3 11. Under the Agreement, the Tribe agreed to implement changes to remedy the
4 problems identified by the NIGC. Specifically, the Agreement provided in part that “[n]o
5 personal loans or advances shall be made to members of the Tribal Council . . . from Casino
6 assets.” The Agreement further provided that:

7 Casino expenditures that do not benefit the gaming operation are prohibited.
8 Casino expenditures are authorized only if they are considered gaming operating
9 expenses in accordance with GAAP. Casino expenditures must be made in
accordance with good business practices. Casino expenditures made for the
benefit of individuals or the Tribe are prohibited.

10 12. Under the Agreement, the Tribe agreed to “comply fully with the NIGC’s
11 monitoring efforts and inform the general membership [of the Tribe]” of the Agreement.

12 13. The Agreement reflects that PRISCILLA HUNTER, as Chairwoman of the Tribal
13 Council, signed the Agreement on the Tribe’s behalf on May 18, 2001.

14 14. MICHELLE CAMPBELL, ALLAN CRABTREE, and DARLENE CRABTREE
15 signed promissory notes, incorporated by reference into the Agreement, under which they agreed
16 to repay the Casino for the amount each was found to have owed. PRISCILLA HUNTER,
17 MICHAEL HUNTER and IRIS MARTINEZ also acknowledged owing money to the Casino, and
18 repaid the Casino such amounts prior to the execution of the Agreement.

19 B. Wells Fargo Debit Cards

20 15. In or about October of 2002, the Tribe’s Chief Financial Officer established a
21 debit card account at Wells Fargo Bank for each of the members of the Tribal Council, including
22 defendants PRISCILLA HUNTER, MICHELLE CAMPBELL, IRIS MARTINEZ and
23 MICHAEL HUNTER.

24 16. The Tribe’s policies and procedures, approved and signed on August 27, 2002 by
25 defendants PRISCILLA HUNTER as Tribal Chairwoman and DARLENE CRABTREE as
26 Secretary, stipulated that “[t]he use of ATM credit cards for personal items is not an allowable
27 expense,” and that “[a] personal purchase will be considered an unauthorized advance.”

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The Tribal Funds Conspiracy

17. PRISCILLA HUNTER, MICHELLE CAMPBELL, IRIS MARTINEZ, and MICHAEL HUNTER would and did steal and misapply Tribal funds by using credit and debit cards issued to them and paid or funded by the Tribe to purchase personal items for their own benefit, in contravention of the Settlement Agreement and the Tribe's and Casino's fiscal policies and procedures.

18. In furtherance of the conspiracy and to accomplish the objects thereof, the defendants committed the following overt acts, among others, in the Northern District of California, and elsewhere:

a. On or about September 16, 2001, defendant PRISCILLA HUNTER misapplied Tribal funds by making personal expenditures totaling approximately \$ 2,178 at the Willard Inter-Continental Hotel in Washington, D.C., using the American Express card paid by the Tribe.

b. On or about November 15, 2002, defendant PRISCILLA HUNTER misapplied Tribal funds by purchasing for personal use art costing approximately \$ 268 from an artist in New Mexico, using the Wells Fargo debit card funded by the Tribe.

c. On or about December 19, 2002, defendant PRISCILLA HUNTER misapplied Tribal funds by purchasing for personal use merchandise costing approximately \$ 338 from Radio Shack, using the Wells Fargo debit card funded by the Tribe.

d. On or about January 6, 2003, defendant PRISCILLA HUNTER misapplied Tribal funds by making personal expenditures totaling approximately \$ 352 at the Hotel Continental in Cancun, Mexico, using the Wells Fargo debit card funded by the Tribe.

e. On or about March 16, 2003, defendant PRISCILLA HUNTER misapplied Tribal funds by purchasing for personal use merchandise costing approximately \$ 216 at the Build-A-Bear Workshop in Sacramento, California, using the American Express card paid by the Tribe.

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1 f. On or about September 13, 2003, defendant PRISCILLA HUNTER
2 misapplied Tribal funds by purchasing for personal use DirecTV services costing approximately
3 \$ 154, using the Wells Fargo debit card funded by the Tribe.

4 g. On or about September 16, 2001, defendant IRIS MARTINEZ misapplied
5 Tribal funds by making personal expenditures totaling approximately \$ 1,077 at the Willard
6 Inter-Continental Hotel in Washington, D.C., using the American Express card paid by the Tribe.

7 h. On or about July 27, 2002, defendant IRIS MARTINEZ misapplied Tribal
8 funds by purchasing for personal use merchandise costing approximately \$ 387 from Made in
9 Oregon, using the American Express card paid by the Tribe.

10 i. On or about June 11, 2001, defendant MICHELLE CAMPBELL
11 misapplied Tribal funds by purchasing for personal use DirecTV services costing approximately
12 \$ 430, using the American Express card paid by the Tribe.

13 j. On or about November 5, 2001, defendant MICHELLE CAMPBELL
14 misapplied Tribal funds by purchasing for personal use DirecTV services costing approximately
15 \$267, using the American Express card paid by the Tribe.

16 k. On or about February 3, 2003, defendant MICHELLE CAMPBELL
17 misapplied Tribal funds by purchasing for personal use New York Islanders hockey tickets
18 costing approximately \$ 372, using the American Express card paid by the Tribe.

19 l. On or about March 13, 2003, defendant MICHELLE CAMPBELL
20 misapplied Tribal funds by purchasing for a friend an airline ticket costing approximately \$ 279,
21 using the American Express card paid by the Tribe.

22 m. On or about April 10, 2003, defendant MICHAEL HUNTER misapplied
23 Tribal funds by making personal expenditures totaling approximately \$308 at the Phoenician
24 Hotel in Scottsdale, Arizona, using the Wells Fargo debit card funded by the Tribe.

25 All in violation of Title 18, United States Code, Section 371.

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COUNTS TWO THROUGH SEVENTEEN: (18 U.S.C. § 1167(b) and § 2 – Willful Misapplication of Casino Funds; Aiding and Abetting)

19. Paragraphs 1 through 16 are hereby realleged and incorporated here as if they were set forth in full.

The First-Class Airfare Scheme

20. Defendants PRISCILLA HUNTER and IRIS MARTINEZ embezzled, knowingly converted and wilfully misapplied the Casino's funds by causing first-class travel to be booked and paid for them when traveling on business, rather than following the Tribe's and Casino's fiscal policies and procedures and federal regulations requiring all air travel to be booked at coach or economy government rates. As set forth below, the difference between the first-class and coach or economy airfares resulted in significant expense to the Casino and the Tribe.

21. On or about the dates set forth below, in the Northern District of California and elsewhere, the defendants did abstract, purloin, willfully misapply and take with intent to steal money, funds and property of a value in excess of \$1,000 belonging to the Shodakai Coyote Valley Casino, a gaming establishment operated and licensed by an Indian tribe pursuant to an ordinance and resolution approved by the National Indian Gaming Commission, in violation of Title 18, United States Code, Sections 1167(b) and 2.

COUNT	DEFENDANTS	APPROXIMATE DATE OF TRAVEL	MISAPPLICATION
Two	PRISCILLA HUNTER IRIS MARTINEZ	September 10, 2001	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$3,200 per ticket.
Three	PRISCILLA HUNTER IRIS MARTINEZ	January 2, 2002	Round-trip first-class travel between Sacramento and Washington, D.C., at an additional cost of over \$3,400 per ticket.
Four	PRISCILLA HUNTER IRIS MARTINEZ	March 1, 2002	Round-trip first-class travel between Sacramento and Washington, D.C., at an additional cost of over \$3,600 per ticket.

Five	PRISCILLA HUNTER IRIS MARTINEZ	April 15, 2002	Round-trip first-class travel between Sacramento and Washington, D.C., at an additional cost of over \$3,600 per ticket.
Six	IRIS MARTINEZ	June 14, 2002	One-way first-class travel from Chicago to Ontario, California, at an additional cost of over \$1,400.
Seven	PRISCILLA HUNTER IRIS MARTINEZ	October 6, 2002	Round-trip first class travel between Sacramento and Washington, D.C., at an additional cost of over \$3,300 per ticket.
Eight	PRISCILLA HUNTER IRIS MARTINEZ	February 10, 2003	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$3,600 per ticket.
Nine	PRISCILLA HUNTER IRIS MARTINEZ	February 24, 2003	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$3,200 per ticket.
Ten	PRISCILLA HUNTER IRIS MARTINEZ	June 16, 2003	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$3,600 per ticket.
Eleven	IRIS MARTINEZ	July 15, 2003	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$2,800.
Twelve	IRIS MARTINEZ	July 18, 2003	One-way first-class travel between Washington, D.C. and Sacramento, at an additional cost of over \$1,700.
Thirteen	PRISCILLA HUNTER	July 28, 2003	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$3,200.
Fourteen	PRISCILLA HUNTER IRIS MARTINEZ	August 13, 2003	Round-trip first-class travel between Sacramento and Washington, D.C., at an additional cost of over \$3,400 per ticket.

Fifteen	PRISCILLA HUNTER IRIS MARTINEZ	August 15, 2003	One-way first-class travel from Washington, D.C. to Sacramento, at an additional cost of over \$1,700 per ticket.
Sixteen	PRISCILLA HUNTER IRIS MARTINEZ	February 8, 2004	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$1,000 per ticket.
Seventeen	IRIS MARTINEZ	March 22, 2004	Round-trip first-class travel between San Francisco and Washington, D.C., at an additional cost of over \$3,000.

COUNT EIGHTEEN: (18 U.S.C. § 371 – Conspiracy to Misapply Casino Funds)

22. Paragraphs 1 through 6 are realleged and incorporated here as if they were set forth in full.

23. In or around and between April 2002 and March 2004, the defendants

PRISCILLA HUNTER,
MICHELLE CAMPBELL,
IRIS MARTINEZ,
MICHAEL HUNTER,
DARLENE CRABTREE,
ALLAN CRABTREE, and
FRED NAREDO, SR.,

and others known and unknown to the grand jury, did knowingly and intentionally conspire to commit an offense against the United States, specifically, willful misapplication and taking of funds of a value in excess of \$1,000 belonging to a gaming establishment on Indian lands, in violation of Title 18, United States Code, Section 1167(b).

Background Allegations

24. The Casino maintained a checking account with an account number ending in 045634 at Savings Bank of Mendocino County in Redwood Valley, California (hereafter “the Casino’s account”). Under the Tribe’s and Casino’s policies, two Tribal Council members had to sign a check before it could be issued from the Casino’s account. The Casino account contained only gaming revenues.

25. The Settlement Agreement prohibited charitable or other gifts from being made from Casino funds. The Agreement also provided that “[i]f the Tribe wishes to make charitable

1 gifts, it may do so as a government in conformance with the approved uses of net gaming
2 revenues, after such revenues have moved from the gaming operation to the Tribe.”

3 26. The Gaming Ordinance required fifty percent of the Tribe’s net gaming revenue
4 generated by the Casino to be distributed periodically to the Tribe’s membership in the form of
5 per capita payments, with the other fifty percent to be allocated for designated purposes.

6 The Political Contribution Conspiracy

7 27. The defendants conspired to misapply and take funds belonging to the Casino by
8 improperly using Casino funds to make contributions to several federal and California politicians
9 and political organizations.

10 28. In furtherance of the conspiracy and to accomplish the objects thereof, the
11 defendants committed the following overt acts, among others, in the Northern District of
12 California, and elsewhere:

13 a. On or about April 2, 2002, defendants ALLAN CRABTREE and FRED
14 NAREDO, SR. signed a check in the amount of \$2,500 drawn on the Casino’s general account
15 and made payable to “[State Politician A] Comm.”

16 b. On or about June 20, 2002, defendants ALLAN CRABTREE and
17 MICHAEL HUNTER signed a check in the amount of \$1,000 drawn on the Casino’s general
18 account and made payable to “Friends of [Congressperson B].”

19 c. On or about August 12, 2002, defendant PRISCILLA HUNTER, in her
20 capacity as the Tribe’s Chairwoman, signed a “Friends of [Congressperson B] Contribution
21 Response Form” regarding the \$1,000 contribution made on June 20, 2002.

22 d. On or about August 23, 2002, defendants FRED NAREDO, SR. and
23 DARLENE CRABTREE signed a check in the amount of \$5,000 drawn on the Casino’s general
24 account and made payable to “[State Politician A] Committee.”

25 e. On or about September 19, 2002, defendants ALLAN CRABTREE and
26 MICHAEL HUNTER signed a check in the amount of \$5,000 drawn on the Casino’s general
27 account and made payable to “[State Politician A] Comm.”

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1 f. On or about September 24, 2003, defendants PRISCILLA HUNTER and
2 IRIS MARTINEZ signed a check in the amount of \$10,000 drawn on the Tribal Council's
3 operating account and made payable to "Yes on [State Politician A]."

4 g. On or about September 29, 2003, defendants ALLAN CRABTREE and
5 IRIS MARTINEZ signed a check in the amount of \$7,000 drawn on the Casino's general account
6 and made payable to "Coyote Valley Tribal Council." In the Casino's fiscal records, the
7 "Description" entry for this check is "[State Politician A] Campaign 2003."

8 h. On or about March 12, 2004, defendants MICHELLE CAMPBELL and
9 DARLENE CRABTREE signed a check in the amount of \$500 drawn on the Casino's general
10 account and made payable to "[Candidate C] for Congress."

11 i. On or about March 17, 2004, defendants MICHELLE CAMPBELL and
12 DARLENE CRABTREE signed a check in the amount of \$3,800 drawn on the Casino's general
13 account and made payable to "[State Politician D] 2004."

14 All in violation of Title 18, United States Code, Section 371.

15 COUNTS NINETEEN THROUGH TWENTY-FIVE: (18 U.S.C. § 1167(b) and § 2 – Willful
16 Misapplication of Casino Funds; Aiding and Abetting)

17 29. Paragraphs 1 through 6 and 22 through 28 are realleged and incorporated here as
18 if they were set forth in full.

19 30. On or about the dates set forth below, in the Northern District of California and
20 elsewhere, the defendants did willfully misapply money, funds and property of a value in excess
21 of \$1,000 belonging to the Shodakai Coyote Valley Casino, a gaming establishment operated and
22 licensed by an Indian tribe pursuant to an ordinance and resolution approved by the National
23 Indian Gaming Commission, in violation of Title 18, United States Code, Sections 1167(b) and

24 2.

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COUNT	DEFENDANTS	APPROXIMATE DATE	MISAPPLICATION
Nineteen	ALLAN CRABTREE FRED NAREDO, SR.	April 2, 2002	Signed a check in the amount of \$2,500 drawn on the Casino's general account and made payable to "[State Politician A] Comm."
Twenty	ALLAN CRABTREE MICHAEL HUNTER	June 20, 2002	Signed a check in the amount of \$1,000 drawn on the Casino's general account and made payable to "Friends of [Congressperson B]."
Twenty-One	PRISCILLA HUNTER	August 12, 2002	Signed a "Friends of [Congressperson B] Contribution Response Form" regarding the \$1,000 contribution made on June 20, 2002.
Twenty-Two	FRED NAREDO, SR. DARLENE CRABTREE	August 23, 2002	Signed a check in the amount of \$5,000 drawn on the Casino's general account and made payable to "[State Politician A] Committee."
Twenty-Three	ALLAN CRABTREE MICHAEL HUNTER	September 19, 2002	Signed a check in the amount of \$5,000 drawn on the Casino's general account and made payable to "[State Politician A] Comm."
Twenty-Four	ALLAN CRABTREE IRIS MARTINEZ	September 29, 2003	Signed a check in the amount of \$7,000 drawn on the Casino's general account and made payable to "Coyote Valley Tribal Council."
Twenty-Five	MICHELLE CAMPBELL DARLENE CRABTREE	March 17, 2004	Signed a check in the amount of \$3,800 drawn on the Casino's general account and made payable to "[State Politician D] 2004."

1 COUNT TWENTY-SIX: (18 U.S.C. § 371 – Conspiracy to Obstruct Justice)

2 31. Paragraphs 1 through 30 are realleged and incorporated here as if they were set
3 forth in full.

4 Background Allegations

5 32. Under the Agreement, the Tribe agreed to “comply fully with the NIGC’s
6 monitoring efforts and inform the general membership [of the Tribe]” of the Agreement.

7 33. The Agreement reflects that PRISCILLA HUNTER, as Chairwoman of the Tribal
8 Council, signed the Agreement on the Tribe’s behalf on May 18, 2001.

9 34. Under Title 28, United States Code, Sections 2704 and 2706, the NIGC is
10 established within the United States Department of the Interior and is charged, among other
11 things, with monitoring certain gaming activities conducted on Indian lands.

12 The Obstruction Conspiracy

13 35. In or around July 2003, in the Northern District of California and elsewhere, the
14 defendants

15 PRISCILLA HUNTER,
16 MICHELLE CAMPBELL, and
IRIS MARTINEZ,

17 and others known and unknown to the grand jury, did knowingly and intentionally conspire to
18 commit an offense against the United States, specifically, obstruction of justice in violation of
19 Title 18, United States Code, Section 1519.

20 36. The defendants, having been informed that NIGC planned to conduct an
21 investigation regarding the Tribe’s and Casino’s compliance with the Agreement, conspired to
22 participate in the alteration and destruction of Tribal and Casino records, with the intent to
23 impede, obstruct and influence the NIGC investigation.

24 37. In furtherance of the conspiracy and to accomplish the objects thereof, the
25 defendants committed and caused to be committed the following overt acts, among others, in the
26 Northern District of California and elsewhere:

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1 a. In or around July 2003, defendant PRISCILLA HUNTER directed a Tribal
2 employee to blacken out American Express account information in financial records maintained
3 by the Tribe and the Casino.

4 b. In or around July 2003, defendants PRISCILLA HUNTER, MICHELLE
5 CAMPBELL, and IRIS MARTINEZ, and others, met to alter, mutilate, conceal, cover up, falsify
6 and make false entries in Tribal and Casino financial and business records.

7 c. In or around July 2003, a Casino employee shredded certain Tribal
8 business records.

9 All in violation of Title 18, United States Code, Section 371.

10 COUNT TWENTY-SEVEN: (18 U.S.C. §§ 1519 and 2 – Obstruction of Justice; Aiding and
11 Abetting)

12 38. Paragraphs 1 through 37 are realleged and incorporated here as if they were set
13 forth in full.

14 39. In or around July 2003, in the Northern District of California and elsewhere, the
15 defendants

16 PRISCILLA HUNTER,
17 MICHELLE CAMPBELL, and
18 IRIS MARTINEZ,

19 and others known and unknown to the grand jury, did participate in a scheme to knowingly alter,
20 destroy, mutilate, conceal, cover up, falsify and make a false entry in Tribal and Casino records,
21 documents and tangible objects, with the intent to impede, obstruct and influence the
22 investigation and proper administration of a matter within the jurisdiction of the NIGC, a
23 department and agency of the United States, and in relation to and contemplation of such matter,
24 in violation of Title 18, United States Code, Section 1519.

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1 COUNT TWENTY-EIGHT: (26 U.S.C. § 7201 – Tax Evasion)

2 40. During the calendar year 1999, the defendant

3 PRISCILLA HUNTER,

4 a resident of Redwood Valley, California, had and received taxable income in excess of the
5 threshold amount triggering the requirement to pay income tax; that upon said taxable income
6 there was income tax owing to the United States of America; that well-knowing and believing
7 the foregoing facts, PRISCILLA HUNTER, on or about August 15, 2000, in the Northern
8 District of California, did willfully attempt to evade and defeat the said income tax due and
9 owing by her to the United States of America for said calendar year by failing to make an income
10 tax return on or before August 15, 2000, as required by law, to any proper officer of the Internal
11 Revenue Service, by failing to pay to the Internal Revenue Service said income tax, and by
12 providing falsely incomplete income data for that year to her tax return preparer, in concealing
13 and attempting to conceal from all proper officers of the United States of America her true and
14 correct income.

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

16 COUNT TWENTY-NINE: (26 U.S.C. § 7201 – Tax Evasion)

17 41. During the calendar year 2000, the defendant

18 PRISCILLA HUNTER,

19 a resident of Redwood Valley, California, had and received taxable income in excess of the
20 threshold amount triggering the requirement to pay income tax; that upon said taxable income
21 there was income tax owing to the United States of America; that well-knowing and believing
22 the foregoing facts, PRISCILLA HUNTER, on or about April 16, 2001, in the Northern District
23 of California, did willfully attempt to evade and defeat the said income tax due and owing by her
24 to the United States of America for said calendar year by failing to make an income tax return on
25 or before April 16, 2001, as required by law, to any proper officer of the Internal Revenue
26 Service, by failing to pay to the Internal Revenue Service said income tax, and by providing
27 falsely incomplete income data for that year to her tax return preparer, in concealing and
28 attempting to conceal from all proper officers of the United States of America her true and

1 correct income.

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

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

4 42. During the calendar year 2002, the defendant

5 PRISCILLA HUNTER,

6 a resident of Redwood Valley, California, had and received taxable income in excess of the
7 threshold amount triggering the requirement to pay income tax; that upon said taxable income
8 there was income tax owing to the United States of America; that well-knowing and believing
9 the foregoing facts, PRISCILLA HUNTER, on or about August 15, 2003, in the Northern
10 District of California, did willfully attempt to evade and defeat the said income tax due and
11 owing by her to the United States of America for said calendar year by failing to make an income
12 tax return on or before August 15, 2003, as required by law, to any proper officer of the Internal
13 Revenue Service, by failing to pay to the Internal Revenue Service said income tax, and by filing
14 an application for an automatic extension of time to file a tax return in which she falsely
15 estimated her anticipated tax liability for that year to be zero dollars, in concealing and
16 attempting to conceal from all proper officers of the United States of America her true and
17 correct income.

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

19 COUNT THIRTY-ONE: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

20 43. During the calendar year 1999, the defendant

21 PRISCILLA HUNTER,

22 then a resident of Redwood Valley, California, received sufficient gross income that the law
23 required her to file with the Internal Revenue Service a federal individual income tax return on or
24 before August 15, 2000, but defendant PRISCILLA HUNTER willfully failed to file her return in
25 the Northern District of California or elsewhere on or before that date.

26 All in violation of Title 26, United States Code, Section 7203.

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1 COUNT THIRTY-TWO: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

2 44. During the calendar year 2000, the defendant

3 PRISCILLA HUNTER,

4 then a resident of Redwood Valley, California, received sufficient gross income that the law
5 required her to file with the Internal Revenue Service a federal individual income tax return on or
6 before April 16, 2001, but defendant PRISCILLA HUNTER willfully failed to file her return in
7 the Northern District of California or elsewhere on or before that date.

8 All in violation of Title 26, United States Code, Section 7203.

9 COUNT THIRTY-THREE: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

10 45. During the calendar year 2001, the defendant

11 PRISCILLA HUNTER,

12 then a resident of Redwood Valley, California, received sufficient gross income that the law
13 required her to file with the Internal Revenue Service a federal individual income tax return on or
14 before April 15, 2002, but defendant PRISCILLA HUNTER willfully failed to file her return in
15 the Northern District of California or elsewhere on or before that date.

16 COUNT THIRTY-FOUR: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

17 46. During the calendar year 2002, the defendant

18 PRISCILLA HUNTER,

19 then a resident of Redwood Valley, California, received sufficient gross income that the law
20 required her to file with the Internal Revenue Service a federal individual income tax return on or
21 before August 15, 2003, but defendant PRISCILLA HUNTER willfully failed to file her return in
22 the Northern District of California or elsewhere on or before that date.

23 All in violation of Title 26, United States Code, Section 7203.

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1 COUNT THIRTY-FIVE: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

2 47. During the calendar year 2003, the defendant

3 PRISCILLA HUNTER,

4 then a resident of Redwood Valley, California, received sufficient gross income that the law
5 required her to file with the Internal Revenue Service a federal individual income tax return on or
6 before April 15, 2004, but defendant PRISCILLA HUNTER willfully failed to file her return in
7 the Northern District of California or elsewhere on or before that date.

8 All in violation of Title 26, United States Code, Section 7203.

9 COUNT THIRTY-SIX: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

10 48. During the calendar year 2000, the defendant

11 MICHELLE CAMPBELL,

12 then a resident of Redwood Valley, California, received sufficient gross income that the law
13 required her to file with the Internal Revenue Service a federal individual income tax return on or
14 before April 16, 2001, but defendant MICHELLE CAMPBELL willfully failed to file her return
15 in the Northern District of California or elsewhere on or before that date.

16 All in violation of Title 26, United States Code, Section 7203.

17 COUNT THIRTY-SEVEN: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

18 49. During the calendar year 2001, the defendant

19 MICHELLE CAMPBELL,

20 then a resident of Redwood Valley, California, received sufficient gross income that the law
21 required her to file with the Internal Revenue Service a federal individual income tax return on or
22 before April 15, 2002, but defendant MICHELLE CAMPBELL willfully failed to file her return
23 in the Northern District of California or elsewhere on or before that date.

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1 COUNT THIRTY-EIGHT: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

2 50. During the calendar year 2002, the defendant

3 MICHELLE CAMPBELL,

4 then a resident of Redwood Valley, California, received sufficient gross income that the law
5 required her to file with the Internal Revenue Service a federal individual income tax return on or
6 before April 15, 2003, but defendant MICHELLE CAMPBELL willfully failed to file her return
7 in the Northern District of California or elsewhere on or before that date.

8 All in violation of Title 26, United States Code, Section 7203.

9 COUNT THIRTY-NINE: (26 U.S.C. § 7203 – Failure to File Income Tax Return)

10 51. During the calendar year 2003, the defendant

11 MICHELLE CAMPBELL,

12 then a resident of Redwood Valley, California, received sufficient gross income that the law
13 required her to file with the Internal Revenue Service a federal individual income tax return on or
14 before April 15, 2004, but defendant MICHELLE CAMPBELL willfully failed to file her return
15 in the Northern District of California or elsewhere on or before that date.

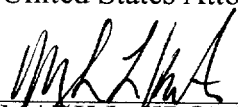
16 All in violation of Title 26, United States Code, Section 7203.

17
18 DATED:

A TRUE BILL.

19
20 FOREPERSON

21 KEVIN V. RYAN
22 United States Attorney

23 
24 MARK L. KROTOSKI
Chief, Criminal Division

25 (Approved as to form: )
26 AUSA Gilliam
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