

1 ROBERT S. MUELLER, III (CSBN 59775)
United States Attorney

2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11
12 UNITED STATES OF AMERICA,)
13 Plaintiff,)
14 v.)
15 STEVEN FRANCIS GIANANDREA,)
16 Defendant.)

No.

VIOLETIONS: 18 U.S.C. § 152(1)-
Concealment of Property in Bankruptcy
Proceeding; 18 U.S.C. § 152(3) - False
Statement in Bankruptcy Proceeding;
18 U.S.C. § 2 - Aiding and Abetting

17 SAN FRANCISCO VENUE

18
19 INDICTMENT

20 The Grand Jury charges:

21 COUNT ONE: (18 U.S.C. § 152(1) and 2)

22 On or about and between February 19, 1998, and March 27, 1998, both dates being
23 approximate and inclusive, in the Northern District of California, the defendant
24 STEVEN FRANCIS GIANANDREA
25 knowingly and fraudulently concealed and caused to be concealed, in connection with a case
26 under Title 11, from creditors and the United States Trustee, property belonging to the estate of
27 the debtor, namely his ownership interest in real property known as 2592 San Jose Avenue, San
28 Francisco, California, in violation of Title 18, United States Code, Sections 152(1) and 2.

INDICTMENT

1 COUNT TWO: (18 U.S.C. § 152(1) and 2)

2 On or about and between February 19, 1998 and June 12, 1998, both dates being
3 approximate and inclusive, in the Northern District of California, the defendant

4 STEVEN FRANCIS GIANANDREA

5 knowingly and fraudulently concealed and caused to be concealed, in connection with a case
6 under Title 11, from creditors and the United States Trustee, property belonging to the estate of
7 the debtor, namely his ownership interest in real property known as 535 Spencer Avenue, Santa
8 Rosa, California, in violation of Title 18, United States Code, Sections 152(1) and 2.

9
10 COUNT THREE: (18 U.S.C. § 152(1) and 2)

11 On or about and between February 19, 1998 and June 12, 1998 both dates being
12 approximate and inclusive, in the Northern District of California, the defendant

13 STEVEN FRANCIS GIANANDREA

14 knowingly and fraudulently concealed and caused to be concealed, in connection with a case
15 under Title 11, from creditors and the United States Trustee, property belonging to the estate of
16 the debtor, namely his ownership interest in real property known as 2301 Flores Avenue, San
17 Mateo, California, in violation of Title 18, United States Code, Section 152(1) and 2.

18
19 COUNT FOUR: (18 U.S.C. §§ 152(3) and 2)

20 On or about March 16, 1998, in the Northern District of California, the defendant

21 STEVEN FRANCIS GIANANDREA

22 knowingly and fraudulently made and caused to be made material false statements under penalty
23 of perjury in and in relation to a case under Title 11, by filing and causing to be filed with the
24 Clerk of the United States Bankruptcy Court in Case No. 98-30706-BTC-13 Schedules and a
25 Statement of Financial Affairs in which he falsely stated that he owned no interest in real property,
26 when in truth as he knew, he owned an interest in parcels of real property known as 2592 San

27 ///

28 ///

1 Jose Avenue, San Francisco, California; 535 Spencer Avenue, Santa Rosa, California; and 2301
2 Flores Avenue, San Mateo, California, in violation of Title 18, United States Code, Sections
3 152(3) and 2.

4
5 COUNT FIVE: (18 U.S.C. § 152(3))

6 On or about March 27, 1998, in the Northern District of California, the defendant

7 **STEVEN FRANCIS GIANANDREA,**

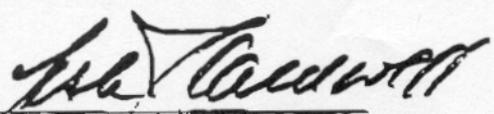
8 at a creditors' meeting in Bankruptcy Case Number 98-30706-BTC-13, knowingly and
9 fraudulently made material false statements under penalty of perjury in and in relation to a case
10 under Title 11, by falsely stating that: (1) he owned and had owned no real property that he had
11 not disclosed, other than the property known as 2592 San Jose Avenue, San Francisco, California,
12 when in truth as he knew, he owned interests in parcels of real property known as 535 Spencer
13 Avenue, Santa Rosa, California and 2301 Flores Avenue, San Mateo, California; and (2) that he
14 had never owned any ownership interest in the real property known as 2301 Flores Avenue, San
15 Mateo, California, when in truth as he knew, he had owned and still owned an ownership interest
16 in that real property, in violation of Title 18, United States Code, Section 152(3).

17
18 DATED:

A TRUE BILL.

19
20 FOREPERSON

21
22 ROBERT S. MUELLER, III
23 United States Attorney

24 
25 DAVID W. SHAPIRO
26 Chief, Criminal Division

27 (Approved as to form: )

AUSA A.M. SCOBLE