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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

v.

BRUCE BAKER,

Defendant.

Case No. 20CR1912-BAS

INFORMATION

18 U.S.C. § 371 – Conspiracy to Defraud
the United States and File False Tax
Returns

The United States Attorney charges, at all times material:

1. Beginning in at least the mid-1980s and continuing up to and including at least October 2018, within the Southern District of California and elsewhere, defendant BRUCE BAKER knowingly and intentionally conspired and agreed with Y.G. and others to: (1) defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful functions of the Internal Revenue Service (“IRS”) in the ascertainment, computation, assessment, and collection of revenue; and (2) file false tax returns in violation of 26 U.S.C. § 2706(1).

2. The purpose of the conspiracy was to fraudulently obtain hundreds of thousands of dollars for defendant’s and Y.G.’s personal use and benefit by using false information and fabricated records to pretend to be eligible for tax deductions for millions

1 of dollars in fictitious charitable donations, when in fact defendant knew and intended that
2 the “gifts to charity” he reported on his tax returns, which he made and signed under penalty
3 of perjury, were materially false and fraudulent, and knew that he was not entitled to these
4 tax deductions.

5 3. In furtherance of the conspiracy, defendant and Y.G. took a number of overt
6 acts, including that on around September 13, 2018, defendant made and subscribed to a
7 2017 U.S. Individual Income Tax Return, Form 1040, which was verified by a written
8 declaration that it was being signed subject to the penalties of perjury and which defendant
9 caused to be filed with the IRS. Defendant did not believe that the return was true and
10 correct as to every material matter in that defendant willfully and intentionally falsely
11 reported to have made approximately \$250,126 in charitable donations in 2017. In fact,
12 defendant knew that these “gifts to charity” were materially false and fraudulent in that the
13 director of the charity had secretly returned the purported “donations” to defendant (keeping
14 10% as his fee), and defendant was not entitled to the deduction.

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

16 ROBERT S. BREWER, JR.
17 United States Attorney

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19 EMILY W. ALLEN
20 OLEKSANDRA JOHNSON
21 ANDREW P. YOUNG
22 Assistant U.S. Attorneys

19 DATED: 7/2/2020