

1 STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

2 THOMAS A. COLTHURST (CABN 99493)  
3 Chief, Criminal Division

4 MICHAEL G. PITMAN (DCBN 484164)  
Assistant United States Attorney  
5 150 Almaden Boulevard, Suite 900  
San Jose, CA 95113  
6 Telephone: (408) 535-5040  
Facsimile: (408) 535-5081  
7 Email: michael.pitman@usdoj.gov

8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN JOSE DIVISION

12 UNITED STATES OF AMERICA, ) Case No.: 5:21-CR-00400-BLF  
13 Plaintiff, ) Date Filed: 10/15/2021  
14 v. ) NOTICE OF RELATED CASE IN A CRIMINAL  
15 ROBERT GARY HANSEN, ) ACTION  
16 Defendant. )

17 UNITED STATES OF AMERICA, ) Case No. 5:21-CR-00454-EJD  
18 Plaintiff, ) Date Filed: 11/16/2021  
19 v. )  
20 DON M. BAKER, )  
21 Defendant. )

23 UNITED STATES OF AMERICA, ) Case No. 5:22-CR-00123-BLF  
24 Plaintiff, ) Date Filed: 3/18/2022  
25 v. )  
26 DHIRENDRA PRASAD, )  
27 Defendant. )

1 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court  
2 that the three above-captioned criminal cases are related.

3 The Information in *United States v. Robert Gary Hansen*, Case No. 5:21-CR-00400-BLF, was  
4 filed on October 15, 2021, and the case was assigned to the Honorable Beth Labson Freeman. The  
5 Information in *United States v. Don M. Baker*, Case No. 5:21-cr-00454-EJD, was filed on November 16,  
6 2021, and the case was originally assigned to the Honorable Lucy H. Koh, and subsequently reassigned  
7 to the Honorable Edward J. Davila. The government filed a Notice of Related Case with respect to these  
8 two cases on November 18, 2021, and the Court determined that the cases were not related in an Order  
9 dated November 23, 2021.

10 The Information in *United States v. Dhirendra Prasad*, Case No. 5:22-CR-00123-BLF, was filed  
11 on March 18, 2022, and the case was assigned to Judge Freeman. This case is related to both *United*  
12 *States v. Robert Gary Hansen*, Case No. 5:21-CR-00400-BLF and *United States v. Don M. Baker*, Case  
13 No. 5:21-cr-00454-EJD. Mr. Prasad was employed by Apple, Inc., from December of 2008 through  
14 December of 2018. For most of that period, Mr. Prasad was a “buyer” in Apple’s Global Service Supply  
15 Chain. As an Apple buyer, Mr. Prasad received internal orders from Apple, requested quotes for the  
16 required parts and services from vendors, reviewed the quotes, negotiated terms, selected vendors, and  
17 placed Purchase Orders using Apple’s purchasing system. Apple then paid vendors based on the invoice  
18 amounts Mr. Prasad entered into the system. The government expects that the evidence at trial will  
19 establish that Mr. Prasad used his position of trust at Apple to engage in multiple different schemes to  
20 defraud Apple, including taking kickbacks, stealing parts using false repair orders, and causing Apple to  
21 pay for items and services it never received resulting in a loss of more than \$10,000,000, and also that  
22 Mr. Prasad evaded tax on the proceeds of his schemes, which he also laundered. Mr. Baker and Mr.  
23 Hansen both owned vendor companies that did business with Apple, and they both conspired with Mr.  
24 Prasad to execute similar, although separate, fraud schemes targeting Apple.

25 As a result, all three cases are related within the meaning of Local Rule 8-1(b)(2) because all  
26 three actions appear likely to entail substantial duplication of labor if heard by different Judges, and  
27 might create conflicts and unnecessary expense if conducted before different Judges, especially with  
28 respect to the sentencings of Mr. Hansen, Mr. Baker, and Mr. Prasad (should he be convicted).

1 In addition, *United States v. Dhirendra Prasad*, Case No. 5:22-cr-00123-BLF, is also related to a  
2 civil matter currently pending in this District – *United States v. The real property located at 577 S.*  
3 *Tradition Street, Mountain House, CA; APN 254-160-340, et al.*, Case No. 5:21-cv-07461-NC. In that  
4 civil case, the government seeks to forfeit assets traced to Mr. Prasad’s crimes, including several pieces  
5 of real property, and the funds contained in several financial accounts.

6 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment  
7 of these cases to a single judge is likely to conserve judicial resources and promote an efficient,  
8 consistent determination of each action.

9  
10 DATED: March 18, 2020

Respectfully submitted,

STEPHANIE M. HINDS  
United States Attorney

s/ Michael G. Pitman  
MICHAEL G. PITMAN  
Assistant United States Attorney