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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
IPPEI MIZUHARA,  
  
Defendant.

CR No. 8:24-cr-00054-JWH

I N F O R M A T I O N

[18 U.S.C. § 1344(2): Bank Fraud;  
26 U.S.C. § 7206(1): Subscribing  
to False Tax Return; 18 U.S.C.  
§ 981(a)(1)(C) and 28 U.S.C.  
§ 2461(c): Criminal Forfeiture]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. §§ 1344(2), 2(b)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Victim A was a professional baseball player from Japan who signed a contract to play baseball for a Major League Baseball team (the "Team") located in the Central District of California beginning in 2018.

2. Defendant IPPEI MIZUHARA was hired by the Team to be a Japanese-language interpreter for Victim A. Defendant MIZUHARA also drove Victim A to meetings and interpreted for Victim A outside of

1 baseball activities. Defendant MIZUHARA acted as a de facto manager  
2 and gatekeeper to Victim A.

3 3. Defendant MIZUHARA would regularly interact with Victim A's  
4 sports agents and financial advisors on behalf of Victim A because  
5 Victim A did not speak English and Victim A's agents and financial  
6 advisors did not speak Japanese.

7 4. Bank A was domestic financial institution insured by the  
8 Federal Deposit Insurance Corporation.

9 5. On March 8, 2018, defendant MIZUHARA accompanied Victim A  
10 to Bank A in Phoenix, Arizona, to assist Victim A in opening a bank  
11 account to deposit Victim A's payroll salary. Inside Bank A,  
12 defendant MIZUHARA interpreted for Victim A and assisted him in  
13 opening a bank account (the "x5848 Account"). Defendant MIZUHARA  
14 also interpreted for Victim A when the bank employee provided Victim  
15 A the login information for the x5848 Account on Bank A's website.

16 6. Beginning in or about September 2021, defendant MIZUHARA  
17 began placing bets with an illegal bookmaker. Shortly thereafter,  
18 defendant MIZUHARA began to lose bets and quickly became indebted to  
19 the bookmaker.

20 B. THE SCHEME TO DEFRAUD

21 7. Beginning no later than in or about November 2021, and  
22 continuing through in or about March 2024, in Orange County, within  
23 the Central District of California, and elsewhere, defendant  
24 MIZUHARA, knowingly and with the intent to defraud, devised,  
25 participated in, and executed a scheme and plan designed to obtain  
26 money and property owned by and in custody and control of Bank A,  
27 from the x5848 Account, by means of materially false and fraudulent  
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1 pretenses, representations, and promises, and the concealment of  
2 material facts.

3 8. The fraudulent scheme operated and was carried out, in  
4 substance, in the following manner:

5 a. Using the password for the x5848 Account that  
6 defendant MIZUHARA recalled from when he assisted Victim A in opening  
7 the account in 2018, defendant MIZUHARA successfully signed into the  
8 x5848 Account on Bank A's website in November 2021.

9 b. After obtaining access to the x5848 Account, defendant  
10 MIZUHARA changed the registered email address and phone number on the  
11 account so Bank A employees would call defendant MIZUHARA, and not  
12 Victim A, when attempting to verify wire transfers from the x5848  
13 Account.

14 c. Defendant MIZUHARA then, without the permission or  
15 authorization of Victim A, knowingly accessed the x5848 Account and  
16 transferred funds from that account to others, known and unknown to  
17 the United States Attorney, for the purpose of paying gambling debts  
18 incurred by defendant MIZUHARA.

19 9. In total, as a result of the aforementioned scheme to  
20 defraud, between in or about November 2021 and in or about March  
21 2024, defendant MIZUHARA fraudulently transferred and willfully  
22 caused to be transferred approximately \$16.5 million from the x5848  
23 Account to pay defendant MIZUHARA's gambling debts and other personal  
24 expenses.

25 C. EXECUTION OF THE FRAUDULENT SCHEME

26 10. On or about June 20, 2023, in Orange County, within the  
27 Central District of California, and elsewhere, defendant MIZUHARA  
28 committed and willfully caused others to commit an act which

1 constituted an execution of the fraudulent scheme, namely, defendant  
2 accessed the x5848 Account from the Central District of California  
3 pretending to be Victim A and conducted a wire transfer of \$500,000  
4 to an account controlled by an associate of the bookmaker.

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COUNT TWO

[26 U.S.C. § 7206(1)]

On or about February 1, 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendant IPPEI MIZUHARA willfully made and subscribed to a materially false United States Individual Income Tax Return, Form 1040, for calendar year 2022, which was filed with the Internal Revenue Service and verified by a written declaration that it was made under the penalties of perjury, and which income tax return defendant MIZUHARA did not believe to be true as to every material matter, in that, on such Form 1040, defendant MIZUHARA reported on line 15 that his taxable income for calendar year 2022 was \$136,865, when, as defendant MIZUHARA then knew, his taxable income for that year was substantially higher than he reported.

1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C) and Title 28, United States  
7 Code, Section 2461(c), in the event of the defendant's conviction of  
8 the offense set forth in Count One of this Information.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

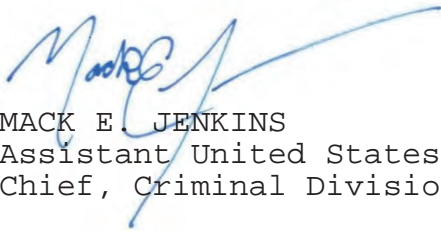
11 a. All right, title, and interest in any and all  
12 property, real or personal, constituting, or derived from, any  
13 proceeds traceable to the offense, including, but not limited to  
14 various collectible baseball cards and sports memorabilia, including  
15 associated protective containers, seized on or about March 25, 2024  
16 and April 5, 2024; and

17 b. To the extent such property is not available for  
18 forfeiture, a sum of money equal to the total value of the property  
19 described in subparagraph (a).

20 3. Pursuant to Title 21, United States Code, Section 853(p),  
21 as incorporated by Title 28, United States Code, Section 2461(c), the  
22 defendant, if so convicted, shall forfeit substitute property, up to  
23 the value of the property described in the preceding paragraph if, as  
24 the result of any act or omission of the defendant, the property  
25 described in the preceding paragraph or any portion thereof (a)  
26 cannot be located upon the exercise of due diligence; (b) has been  
27 transferred, sold to, or deposited with a third party; (c) has been  
28 placed beyond the jurisdiction of the court; (d) has been

1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

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United States Attorney

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6   
7 MACK E. JENKINS  
Assistant United States Attorney  
8 Chief, Criminal Division

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