

FILED

Jul 18 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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Attorney for the United States

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

11 UNITED STATES OF AMERICA,)	CASE NO. CR23-220 VC
)	
12 Plaintiff,)	<u>VIOLATIONS:</u>
)	
13 v.)	18 U.S.C. § 1349 – Conspiracy to Commit
)	Honest Services Wire Fraud;
14 ZHANG LI,)	18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
)	Forfeiture Allegations
15 Defendant.)	
)	SAN FRANCISCO VENUE
)	
)	

18 INFORMATION

19 The Attorney for the United States charges:

20 RELEVANT PARTIES AND ENTITIES

21 1. At all times relevant to this Information, Defendant ZHANG LI was the chairman, co-
22 founder, and chief executive officer of a real estate holdings and development company based in
23 Guangzhou, China. Defendant ZHANG was also the director of Z&L Properties, Inc., which was based
24 in Foster City, California. Z&L Properties managed the development of a mixed-use commercial and
25 residential property at 555 Fulton Street in San Francisco, California (“555 Fulton”).

26 2. At all times relevant to this Information, Mohammed Nuru (“Nuru”) was the Director of
27 San Francisco Public Works, also known as the Department of Public Works (“DPW”) of the City and
28 County of San Francisco. As Director of DPW, Nuru had significant authority and influence over

1 permitting and approvals for contracts and construction projects in San Francisco. Nuru also had
2 significant influence with other San Francisco city agencies and departments with authority over
3 building construction permitting and regulation, including the San Francisco Department of Building
4 Inspection (DBI). Among other things, Nuru could approve, deny, or otherwise take official actions
5 affecting building and construction permits and authorizations that would affect ZHANG and Z&L
6 Properties' project at 555 Fulton.

7 3. At all times relevant to this Information, Walter Wong was a contractor, developer and
8 "permit consultant," as that term is defined in the San Francisco Campaign and Governmental Conduct
9 Code. Wong owned and operated numerous construction and construction-related companies from his
10 offices in San Francisco. Through these companies, Wong did business with numerous San Francisco
11 agencies, including San Francisco DPW. At all times relevant to this Information, Wong served as a
12 "permit consultant" for Z&L Properties' 555 Fulton project.

13 THE HONEST SERVICES FRAUD SCHEME AND CONSPIRACY

14 4. Beginning on a date unknown, but no later than November 2018, and continuing until on
15 or about January 28, 2020, in the Northern District of California and elsewhere, ZHANG, Nuru, Wong,
16 and others participated in, devised, and intended to devise a conspiracy and a scheme and artifice to
17 defraud the public of its right to the honest services of a public official, Nuru, through bribery in breach
18 of Nuru's fiduciary duty. The scheme and conspiracy was carried out by means of materially false and
19 fraudulent pretenses, representations, and promises, and by means of omission and concealment of
20 material facts.

21 5. As part of the scheme to defraud the public of its right to the honest services of Nuru,
22 ZHANG, along with Wong and others known and unknown, helped direct a stream of benefits from
23 ZHANG to Nuru, including payments for food, drink, transportation and lodging for Nuru and another
24 individual during a trip they took to China in 2018. The purpose of this stream of payments and benefits
25 was to influence Nuru to act in ZHANG's favor as opportunities arose, and to have Nuru take official
26 action and exercise official influence in ZHANG's favor in exchange for such payments and benefits.

27 6. During the relevant time period, and in furtherance of the honest services fraud
28 conspiracy, ZHANG communicated with Nuru regarding the development of 555 Fulton by mobile

1 application messages, using interstate and foreign wire communications.

2 COUNT ONE: 18 U.S.C. § 1349 – Conspiracy to Commit Honest Services Wire Fraud

3 7. Paragraphs 1 through 6 of this Information are re-alleged and incorporated as if fully set
4 forth herein.

5 8. Beginning no later than in or about November 2018, and continuing through in or about
6 January 28, 2020, in the Northern District of California and elsewhere, the defendant,

7 ZHANG LI,

8 and Nuru, Wong, and others known and unknown, did knowingly conspire to commit honest services
9 wire fraud, that is, to devise and intend to devise a scheme and artifice to defraud as to a material matter
10 and to obtain money and property by means of materially false and fraudulent pretenses, representations,
11 and promises, and by omission and concealment of material facts, in order to deprive the people of San
12 Francisco of their right to the honest and faithful services of Nuru through bribery, and, for the purpose
13 of executing such scheme or artifice and attempting to do so, did transmit, and cause to be transmitted,
14 by means of wire communication in interstate and foreign commerce, certain writings, signs, signals,
15 pictures, and sounds, in violation of 18 U.S.C. §§ 1343, 1346.

16 All in violation of Title 18, United States Code, Section 1349.

17 FORFEITURE ALLEGATIONS: 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

18 9. The allegations contained in this Information are re-alleged and incorporated by reference
19 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
20 Title 28, United States Code, Section 2461(c).

21 10. Upon conviction for the offense set forth in this Information, the defendant,

22 ZHANG LI,

23 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
24 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
25 from proceeds the defendant obtained directly and indirectly, as the result of those violations, including
26 but not limited to a forfeiture money judgment. If any of the property described above, as a result of any
27 act or omission of the defendant:

28 a. cannot be located upon exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and (b)(1); Title 28, United States Code, Section 2461(c); and Federal Rule of Criminal Procedure 32.2.

DATED: July 18, 2023

PATRICK D. ROBBINS
Attorney for the United States

/s/ David J. Ward
DAVID J. WARD
Assistant United States Attorney