

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney

FILED
Jun 23 2020
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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

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12 UNITED STATES OF AMERICA,) CASE NO. CR 20-257 JD
13 Plaintiff,) **UNDER SEAL**
14 v.) VIOLATIONS:
15 WING LOK “WALTER” WONG,) 18 U.S.C. §§ 1343, 1346 and 1349– Conspiracy to
16 Defendant.) Commit Honest Services Wire Fraud; 18 U.S.C. §
17) 1956(h) – Conspiracy to Commit Money Laundering;
18) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
19) Criminal Forfeiture
20) **SAN FRANCISCO VENUE**

21 INFORMATION

22 The United States Attorney charges:

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

24 1. Beginning at an unknown date, but as early as in or about 2004 and continuing through in
25 or about January 2020, in the Northern District of California and elsewhere, the defendant,

26 WING LOK “WALTER” WONG

27 did knowingly and intentionally conspire with Mohammed NURU and others, including other public
28 officials for the City and County of San Francisco (the “City”), known and unknown to the United States

INFORMATION

1 Attorney, to commit wire fraud, that is, having devised and intending to devise a material scheme and
2 artifice to defraud the City, and the citizens of San Francisco of their right to the honest and faithful
3 services of Mohammed NURU and other City officials through bribery, kickbacks, and the concealment
4 of material information, to transmit and cause to be transmitted by means of wire communication in
5 interstate commerce writings, signs, signals, pictures and sounds for the purpose of executing such
6 scheme and artifice, in violation of Title 18, United States Code, Sections 1343 and 1346. All in
7 violation of Title 18, United States Code, Section 1349.

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9 COUNT TWO: (18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering)

10 2. Beginning at an unknown date, but as early as in or about 2008 and continuing through in
11 or about January 2020, in the Northern District of California and elsewhere, the defendant,

12 WING LOK “WALTER” WONG

13 did knowingly combine, conspire, and agree with Mohammed NURU and with other persons known and
14 unknown to the United States Attorney, to knowingly conduct and attempt to conduct financial
15 transactions affecting interstate commerce and foreign commerce, which transactions involved the
16 proceeds of specified unlawful activity, that is, wire fraud, knowing that the transactions were designed
17 in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the
18 proceeds of specified unlawful activity, and that while conducting and attempting to conduct such
19 financial transactions, knew that the property involved in the financial transactions represented the
20 proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section
21 1956(a)(1)(B)(i). All in violation of Title 18, United States Code, Section 1956 (h).

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

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

27 4. Upon conviction for any of the offenses set forth in this Information , the defendant,

28 “WING LOK” WALTER WONG,

1 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
2 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
3 from proceeds the defendant obtained directly and indirectly, as the result of those violations.

4 If any of the property described above, as a result of any act or omission of the defendant:


- 5 a. cannot be located upon exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the court;
- 8 d. has been substantially diminished in value; or
- 9 e. has been commingled with other property which cannot be divided without
10 difficulty,

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

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

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16 DATED:

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18 DAVID L. ANDERSON
United States Attorney

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21 SCOTT D. JOINER
S. WAQAR HASIB
22 Assistant United States Attorneys
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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

COUNT ONE: 18 U.S.C. §§ 1343, 1346 and 1349- Conspiracy to Commit Honest Services Wire Fraud; Petty
 Minor
COUNT TWO: 18 U.S.C. § 1956(h) - Conspiracy to Commit Money Laundering Misdemeanor
 Felony
PENALTY: PLEASE SEE PENALTY SHEET ATTACHMENT

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

▶ WING LOK "WALTER" WONG

DISTRICT COURT NUMBER

CR 20-257 JD

FILED

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SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. ATTORNEY DEFENSE } SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant } MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under }

Name and Office of Person Furnishing Information on this form David L. Anderson

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Scott D. Joiner

DEFENDANT

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
1) If not detained give date any prior summons was served on above charges ▶
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
5) On another conviction } Federal State
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET ATTACHMENT

Count One:

18 U.S.C. §§ 1343, 1346, 1349 – Conspiracy to Commit Honest Services Wire Fraud

Maximum Penalties: 20 years imprisonment
\$250,000 fine or not more than the greater of twice the gross gain
or twice the gross loss
3 years supervised release
\$100 special assessment
Forfeiture

Count Two:

18 U.S.C. § 1956(h) – Money Laundering Conspiracy

Maximum Penalties: 20 years imprisonment
\$500,000 or twice the value of the monetary instrument or funds
involved in the transaction
3 years supervised release
\$100 special assessment
Forfeiture