

**FILED**  
Mar 08 2021  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

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

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

10 UNITED STATES OF AMERICA, ) CASE NO. 3:21-cr-00096 EMC  
11 )  
Plaintiff, )  
12 ) VIOLATIONS:  
v. ) 18 U.S.C. § 1956(h) – Conspiracy to Commit Money  
13 ) Laundering  
SANDRA ANN ZUNIGA, ) 18 U.S.C. §§ 982(a)(1)(A) and 28 U.S.C. § 2461(c) –  
14 ) Criminal Forfeiture  
Defendant. )  
15 ) SAN FRANCISCO VENUE

16 INFORMATION

17 The United States Attorney charges:

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

19 1. Beginning at an unknown date, but at least as early as 2010, and continuing through in  
20 or about January 2020, in the Northern District of California and elsewhere, the defendant,  
21 SANDRA ANN ZUNIGA  
22 did knowingly combine, conspire, and agree with Mohammed NURU and with other persons known and  
23 unknown to the United States Attorney, to knowingly conduct and attempt to conduct financial  
24 transactions affecting interstate commerce and foreign commerce, which transactions involved the  
25 proceeds of specified unlawful activity, that is, wire fraud, knowing that the transactions were designed  
26 in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the  
27 proceeds of specified unlawful activity, and that while conducting and attempting to conduct such  
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1 financial transactions, knew that the property involved in the financial transactions represented the  
2 proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section  
3 1956(a)(1)(B)(i). All in violation of Title 18, United States Code, Section 1956 (h).

4 FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(1)(A)) and 28 U.S.C. § 2461(c)

5 The allegations contained in this Information are re-alleged and incorporated by reference for the  
6 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1)(A) and Title 28,  
7 United States Code, Section 2461(c).

8 Upon conviction for the offense set forth in this Information, the defendant,  
9  
10 SANDRA ANN ZUNIGA,  
11 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(A) and  
12 Title 28, United States Code, Section 2461(c), any property, real or personal, involved in such offense,  
13 and any property traceable to such property.

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

- 15 a. cannot be located upon exercise of due diligence;
- 16 b. has been transferred or sold to, or deposited with, a third party;
- 17 c. has been placed beyond the jurisdiction of the court;
- 18 d. has been substantially diminished in value; or
- 19 e. has been commingled with other property which cannot be divided without  
20 difficulty,

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

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**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING

**OFFENSE CHARGED**

18 U.S.C. 1956(h) -- Conspiracy to launder money  Petty  
 Minor  
 Misdemeanor  
 Felony

PENALTY: Up to 20 yrs. imprisonment; \$500,000 fine or twice the value of the property involved in the transaction; 3 yrs. supervised release; \$100 mandatory special assessment.

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

NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

SANDRA ANN ZUNIGA

DISTRICT COURT NUMBER  
3:21-cr-00096 EMC

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SAN FRANCISCO

**PROCEEDING**

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

FBI

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 } 20-mj-70698 JCS

Name and Office of Person Furnishing Information on this form Stephanie M. Hinds

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Alexandra Shepard

**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)

NORTHERN DISTRICT OF CALIFORNIA

**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: