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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUNZO SUZUKI and
PAUL SUZUKI,

Defendants.

**SUPERSEDING
CRIMINAL INDICTMENT**

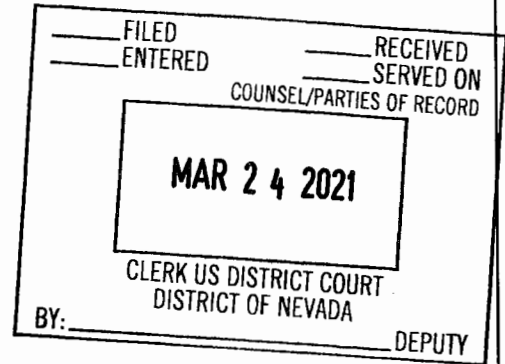
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VIOLATIONS:

Title 18, United States Code, Section 1341—
Mail Fraud (Counts One through Seven);

Title 18, United States Code, Section 1343—
Wire Fraud (Counts Eight through Fifteen);

Title 18, United States Code, Section 2—
Aiding and Abetting (Counts One through
Fifteen).



The Grand Jury Charges that at all times relevant to the Superseding Indictment:

BACKGROUND

1. Defendant Junzo SUZUKI ("J. SUZUKI") was a Japanese citizen, residing in Tokyo, Japan.

2. Defendant Paul SUZUKI ("P. SUZUKI") was a Japanese and United States citizen, residing in Tokyo, Japan.

3. Co-Schemer Edwin Fujinaga ("Fujinaga") was a United States citizen, residing in Las Vegas, Nevada.

4. MRI International Inc. ("MRI") was a Nevada Limited Liability Corporation located and operated in Las Vegas, Nevada. Fujinaga owned and controlled MRI as its President and CEO. MRI operated a Service Center located in Tokyo, Japan. Defendant J. SUZUKI was at various times MRI's Executive Vice President (Asia Pacific), and Defendant P. SUZUKI was at various times General Manager of MRI's Japan operations.

THE SCHEME AND ARTIFICE TO DEFRAUD

5. From in or about April 2012 and continuing until at least in or about April 2013, J. SUZUKI, P. SUZUKI, Fujinaga, and others known and unknown to the Grand Jury, aided and abetted by each other, made, and caused to be made, numerous material misrepresentations designed to fraudulently induce investors to transmit money to MRI.

6. As part of the scheme and artifice, the defendants and their co-schemers represented, among other things, that MRI was engaged in the business of purchasing medical accounts receivable ("MARS"), that is, debts owed by recipients of medical services or products to the individuals or entities that provided those services. MRI purported to purchase the accounts from providers at a discounted rate and then collect on the accounts

1 from the patients owing money. MRI's profit from this activity, according to the defendants
2 and their co-schemers, was generated from the difference between the price at which MRI
3 purchased the MARS and the amount MRI collected on them due to MRI's purportedly
4 superior collections capability.

5 7. As a further part of the scheme and artifice, the defendants, their co-schemers,
6 and others working with them, solicited investments in MRI by offering Certificates of
7 Investment (hereinafter "Certificates"), claiming to provide investors with consistent,
8 predictable returns resulting from MRI's superior collections ability. The defendants and their
9 co-schemers marketed and sold the Certificates primarily, if not exclusively, to Japanese
10 citizens through MRI's Service Center in Tokyo. Bearing a face value equal to the amount
11 of the initial investment, the Certificates promised a series of interest payments which would
12 accrue and be paid, along with the principal, when the Certificates reached a specified
13 maturity date. When the Certificates reached maturity, investors were given the option to
14 reinvest the total amount due and owing into a new Certificate instead of receiving a
15 "liquidation," or cash payment of the amount they were due.

16 8. As a further part of the scheme and artifice, the defendants and their co-
17 schemers fraudulently induced investments by knowingly publishing, mailing, distributing,
18 and transmitting promotional materials that falsely represented that MRI would use any
19 money invested in the Certificates exclusively to purchase MARS, the purported profitable
20 business of MRI. Based on this and other false and fraudulent representations and promises,
21 from in or about April 2012 to in or about April 2013, the defendants and their co-schemers
22 induced over a thousand investors to invest a total exceeding \$100 million in MRI Certificates.

23 9. As a further part of the scheme and artifice, and contrary to all representations
24 the defendants and their co-schemers made to investors, MRI functioned as a Ponzi scheme,

1 that is, money solicited from new investors was used to pay the principal and interest owed
2 to prior investors.

3 10. As a further part of the scheme and artifice, the defendants and their co-
4 schemers regularly expended investor money for things other than purchasing MARS,
5 including paying themselves sales commissions.

6 11. As a further part of the scheme and artifice, the defendants and their co-
7 schemers made such other false, fraudulent, deceptive, and deceitful representations as
8 necessary to advance their fraudulent scheme, conceal their fraudulent activities from others,
9 avoid detection, enrich themselves, and cause devastating losses of over \$1.5 billion to their
10 victims.

11 **COUNTS ONE THROUGH SEVEN**

12 **Mail Fraud**

(Title 18, United States Code, Section 1341)

13 12. The allegations set forth in paragraphs 1 through 11 are incorporated herein in
14 full.

15 13. From in or about April 2012 to in or about April 2013, in the State and Federal
16 District of Nevada and elsewhere,

17 **JUNZO SUZUKI and**
18 **PAUL SUZUKI,**

19 defendants herein, with others known and unknown to the grand jury, and aided and abetted
20 by each other and Fujinaga, did devise and intend to devise a material scheme and artifice to
21 defraud and to obtain money and property by means of materially false and fraudulent
22 pretenses, representations, and promises, as set forth above, and for the purpose of executing
23 such scheme and artifice, and attempting to do so, did knowingly: (a) place in any post office
24 and authorized depository for mail matter, any matter and thing whatever to be sent and

delivered by the Postal Service; (b) deposit and cause to be deposited any matter and thing whatever to be sent and delivered by any private and commercial interstate carrier; (c) take and receive any matter and thing whatever that has been sent and delivered by any private and commercial interstate carrier; and (d) cause to be delivered by mail and by private and commercial interstate carrier any matter and thing whatever according to the direction thereon, as follows:

Count	Approximate Date	Description
1	April 26, 2012	A package containing two investment certificates for investor H.H., to be delivered from Las Vegas, Nevada, to Japan
2	July 5, 2012	A package containing four investment certificates for investor N.Y., to be delivered from Las Vegas, Nevada, to Japan
3	September 4, 2012	A package containing six investment certificates for investor I.M., to be delivered from Las Vegas, Nevada, to Japan
4	September 14, 2012	A package containing an investment certificate for investor E.U., to be delivered from Las Vegas, Nevada, to Japan
5	November 15, 2012	A package containing an investment certificate for investor T.M., to be delivered from Las Vegas, Nevada, to Japan
6	November 15, 2012	A package containing three investment certificates for investor H.H., to be delivered from Las Vegas, Nevada, to Japan
7	January 18, 2013	A package containing an investment certificate for investor F.N., to be delivered from Las Vegas, Nevada, to Vancouver, Canada

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS EIGHT THROUGH FIFTEEN

Wire Fraud

(Title 18, United States Code, Section 1343)

14. The allegations set forth in paragraphs 1 through 11 are incorporated herein in full.

15. From in or about April 2012 to in or about April 2013, in the State and Federal District of Nevada and elsewhere,

**JUNZO SUZUKI and
PAUL SUZUKI,**

defendants herein, with others known and unknown to the grand jury, and aided and abetted by each other and Fujinaga, did devise and intend to devise a material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth above, and for the purpose of executing such scheme and artifice, and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, as follows: .

Count	Approximate Date	Description
8	April 26, 2012	Wire transfer by investor H.H. of approximately \$367,242 from Shinsei Bank in Japan to Wells Fargo Bank account number XXXXXX9471 in Las Vegas, Nevada.
9	July 5, 2012	Wire transfer by investor N.Y. of approximately \$200,000 from Sumitomo Mitsui Banking Corp. in Japan to Wells Fargo Bank account number XXXXXX9471 in Las Vegas, Nevada.
10	July 5, 2012	Wire transfer by investor N.Y. of approximately \$200,000 from Sumitomo Mitsui Banking Corp. in Japan to Wells Fargo Bank account number XXXXXX9471 in Las Vegas, Nevada.
11	September 4, 2012	Wire transfer by investor I.M. of approximately \$600,000 from Shinsei Bank in Japan to Wells Fargo Bank account number XXXXXX9430 in Las Vegas, Nevada.
12	September 14, 2012	Wire transfer by investor E.U. of approximately \$190,307 from Saitama Resona Bank in Japan to Wells Fargo Bank account number XXXXXX9471 in Las Vegas, Nevada.
13	November 15, 2012	Wire transfer by investor T.M. of approximately \$93,005.96 from Japan Post Bank in Japan to Wells Fargo Bank account number XXXXXX9471 in Las Vegas, Nevada.
14	November 15, 2012	Wire transfer by investor H.H. of approximately \$300,000 from Shinsei Bank in Japan to Wells Fargo Bank account number XXXXXX9471 in Las Vegas, Nevada.
15	January 18, 2013	Wire transfer by investor F.N. of approximately \$22,047.48 from Lloyds TSB Bank in Japan to Wells Fargo Bank account number XXXXXX2169 in Las Vegas, Nevada.

All in violation of Title 18, United States Code, Sections 1343 and 2.

FORFEITURE ALLEGATION ONE
Mail Fraud

1. The allegations contained in Counts One through Seven of this Superseding Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Seven of this Superseding Criminal Indictment,

JUNZO SUZUKI and
PAUL SUZUKI,

defendants herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), on a conspiracy to commit such offense: an in personam criminal forfeiture money judgment including, but not limited to, at least an amount to be calculated pursuant to the forfeiture statute in this forfeiture allegation and Federal Rule of Criminal Procedure 32.2(b)(2)(C) ("property").

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants:

- a. cannot be located upon the 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;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants for the property listed above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 1341; and Title 21, United States Code, Section 853(p).

FORFEITURE ALLEGATION TWO
Wire Fraud

1. The allegations contained in Counts Eight through Fifteen of this Superseding Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts Eight through Fifteen of this Superseding Criminal Indictment,

JUNZO SUZUKI and
PAUL SUZUKI,

defendants herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense: an in personam criminal forfeiture money judgment including, but not limited to, at least an amount to be calculated pursuant to the forfeiture statute in this forfeiture allegation and Federal Rule of Criminal Procedure 32.2(b)(2)(C) ("property").

1 3. If any property being subject to forfeiture pursuant to Title 18, United States
2 Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c), as a result of
3 any act or omission of the defendants:

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

10 it is the intent of the United States of America, pursuant to Title 21, United States Code,
11 Section 853(p), to seek forfeiture of any other property of the defendants for the property listed
12 above.

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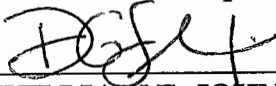
1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28,
2 United States Code, Section 2461(c); Title 18, United States Code, Section 1343; and Title
3 21, United States Code, Section 853(p).

4 **DATED:** this 24th day of March, 2021

5 **A TRUE BILL:**

6 /S/
FOREPERSON OF THE GRAND JURY

8 DANIEL S. KAHN
9 Acting Chief, Fraud Section, Criminal Division
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10 

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Assistant Chief

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17 District of Nevada

18 Attorneys for Plaintiff

UNITED STATES OF AMERICA