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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

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8
9 UNITED STATES OF AMERICA,)
10 Plaintiff,)
11 vs.)
12 ARANTZAZU ATORRASAGASTI,)
13 Defendant)

Case No.: 2:17-cr- 00089- APG-VCF

CRIMINAL INFORMATION

VIOLATIONS:

18 U.S.C. § 1349 – Conspiracy to Commit
Mail and Wire Fraud;
Forfeiture Allegations

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15 **THE UNITED STATES ATTORNEY CHARGES THAT:**

16 **COUNT ONE**

(Conspiracy to Commit Mail Fraud and Wire Fraud)

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18 A. From in or about October 2010, to in or about April 2012, in the State and Federal
19 District of Nevada and elsewhere,

20 **ARANTZAZU ATORRASAGASTI,**

21 defendant herein, did agree and conspire together with D.M.B., also known as “Wolf,” P.M.M.,
22 S.M.S., D.A.L., A.M.Y., A.Z., B.N., B.S.L., C.T.B., D.R.T., H.R.P., J.A.L., J.Y.F., L.L., L.C.G.,
23 M.P., R.I.M., R.J.C., T.T., and others known and unknown:
24

1 protection and law enforcement agencies and other entities and to evade detection and apprehension
2 by law enforcement.

3 2. Defendant and her coconspirators induced and attempted to induce victims to
4 send money and property to the fraudulent corporations by making materially false and fraudulent
5 pretenses, representations, and promises to them, including but not limited to: (1) the names of
6 defendant and her coconspirators; (2) the geographic location of each of the various companies; (3)
7 that the various companies were actively engaged in business, were licensed and authorized by law
8 to arrange the sale of time share properties, and were in fact arranging the sale of timeshare
9 properties, when in fact the companies were operated primarily as a means to defraud investors;
10 (4) that a buyer had offered to purchase the victim's timeshare property, when in fact no buyer
11 existed; and (5) that the various companies would close the sale of the victim's timeshare property
12 within 90 days of the victim's payment, when in fact each of the fictitious companies was operated
13 for no more than 90 days in order to dissociate the scheme from complaints made to consumer
14 protection and law enforcement agencies and other entities and to evade detection and apprehension
15 by law enforcement.

16 3. Defendant and her coconspirators made and caused to be made interstate
17 wire communications to customers to induce the victims to part with money and to lull victims into
18 believing that their investments were sound and that their funds would be recovered.

19 4. Defendant and her coconspirators sent and caused to be sent victim funds and
20 documents by means of U.S. Mail, interstate commercial carriers, and interstate wire
21 communications to complete the transactions.

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

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1 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section
2 853(p), to seek forfeiture of any properties of the defendant for the in personam criminal forfeiture
3 money judgment including, but not limited to, at least \$220,968.

4 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United
5 States Code, Section 2461(c); Title 18, United States Code, Sections 1341, 1343, and 1349; and
6 Title 21, United States Code, Section 853(p).

7 **FORFEITURE ALLEGATION TWO**
8 **(Conspiracy to Commit Mail Fraud and Wire Fraud)**

9 1. The allegations contained in Count One of this Criminal Information are hereby
10 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to
11 Title 18, United States Code, Section 982(a)(8)(B).

12 2. Upon conviction of the felony offense charged in Count One of this Criminal
13 Information,

14 **ARANTZAZU ATORRASAGASTI,**

15 defendant herein, shall forfeit to the United States of America, any real or personal property
16 constituting, derived from, or traceable to the gross proceeds obtained directly or indirectly as a
17 result of violations of Title 18, United States Code, Sections 1341 and 1343, or of Title 18, United
18 States Code, Section 1349, conspiracy to commit such offenses, an in personam criminal forfeiture
19 money judgment including, but not limited to, at least \$220,968 (property).

20 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
21 Section 982(a)(8)(B), as a result of any act or omission of the defendant -

- 22 a. cannot be located upon the exercise of due diligence;
23 b. has been transferred or sold to, or deposited with, a third party;
24 c. has been placed beyond the jurisdiction of the court;

- 1 d. has been substantially diminished in value; or
- 2 e. has been commingled with other property which cannot be divided without
- 3 difficulty;

4 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section
5 853(p), to seek forfeiture of any properties of the defendant for the in personam criminal forfeiture
6 money judgment including, but not limited to, at least \$220,968.

7 All pursuant to Title 18, United States Code, Section 982(a)(8)(B); Title 18, United States
8 Code, Sections 1341, 1343, and 1349; and Title 21, United States Code, Section 853(p).

9 DATED: March 20, 2017

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11 STEVEN W. MYHRE
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14 DANIEL J. COWHIG
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