KEVIN V. RYAN
United States Attorney

FILED
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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MJJ

UNITED STATES DISTRICT COURT FOR THE

NORTHERN DISTRICT OF CALIFORNIA

CR 05 0002

OAKLAND DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. YOGESH K. GANDHI and KRISTI M. GANDHI, Defendants.	No. VIOLATIONS: 31 USC 5324(a)(3) - Unlawful Structuring of Currency Transactions OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (31 U.S.C. § 5324(a)(3) - Unlawful Structuring of Currency Transactions)

On October 25, 2001 and October 26, 2001, all dates being approximate and inclusive, in the Northern District of California, and elsewhere, the defendants

YOGESH K. GANDHI and KRISTI M. GANDHI

did structure and assist in structuring transactions with Citibank Federal Savings Bank, which is a domestic financial institution, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a).

In violation of Title 31, United States Code, Section 5324 (a)(3).

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COUNT TWO: (31 U.S.C. § 5324(a)(3) - Unlawful Structuring of Currency Transactions)

On January 8, 2002, this date being approximate, in the Northern District of California, and elsewhere, the defendants

YOGESH K. GANDHI and KRISTI M. GANDHI,

did structure and assist in structuring transactions with Citibank Federal Savings Bank, which is a domestic financial institution, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a).

In violation of Title 31, United States Code, Section 5324 (a)(3).

COUNT THREE: (31 U.S.C. § 5324(a)(3) - Unlawful Structuring of Currency Transactions)

On January 28, 2002 and January 29, 2002, all dates being approximate and inclusive, in the Northern District of California, and elsewhere, the defendants

YOGESH K. GANDHI and KRISTI M. GANDHI,

did structure and assist in structuring with Citibank Federal Savings Bank, which is a domestic financial institution, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a).

In violation of Title 31, United States Code, Section 5324 (a)(3).

COUNT FOUR: (31 U.S.C. § 5324(a)(3) - Unlawful Structuring of Currency Transactions)

On February 20, 2002, this date being approximate, in the Northern District of California, and elsewhere, the defendants

YOGESH K. GANDHI and KRISTI M. GANDHI,

did structure and assist in structuring transactions with Citibank Federal Savings Bank, which is a domestic financial institution, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a).

In violation of Title 31, United States Code, Section 5324 (a)(3).

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COUNT FIVE: (31 U.S.C. § 5324(a)(3) - Unlawful Structuring of Currency Transactions)

On or about May 29, 2002, May 30, 2002, May 31, 2002, June 1, 2002, June 3, 2002, June 4, 2002, and June 5, 2002, all dates being approximate and inclusive, in the Northern District of California, and elsewhere, the defendant

YOGESH K. GANDHI

did structure and assist in structuring transactions with Washington Mutual Bank, FA, which is a domestic financial institution, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a).

In violation of Title 31, United States Code, Section 5324 (a)(3).

A True Bill

Dated: January 4, 2005

FOREPERSON

KEVIN V. RYAN
United States Attorney

EUMI L. CHOI
Acting Chief, Criminal Section

Approved as to Form

AUSA: THOMAS MOORE