

AO 257 (Rev. 6/78)

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

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

Count 1: 18 U.S.C. § 1956(h) - Conspiracy to Launder Monetary Instruments Petty Minor
Counts 2-6: 18 U.S.C. § 1956(a)(3)(B) - Money Laundering Misdemeanor Felony
PENALTY: 20 years prison; a \$250,000 fine; at 3 years on supervised release; a \$100 special assessment

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

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

Anthony Keslinke

DISTRICT COURT NUMBER

CRI4-00237

FILED
APR 24 2014
RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND
PJH

PROCEEDING

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

INTERNAL REVENUE SERVICE

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 re prosecution 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

4-14-70145

Name and Office of Person Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AARON D. WEGNER

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 2/10/14

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

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

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

Defendant Address: _____

Date/Time: _____ Before Judge: _____

Comments: _____

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: Oakland

FILED
APR 24 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES OF AMERICA,

v.

ANTHONY KESLINKE,

CR14-00237

PJH

DEFENDANT.

INDICTMENT

18 U.S.C. § 1956(h) - Conspiracy to Launder Monetary Instruments;
18 U.S.C. § 1956(a)(3)(B) - Money Laundering;
18 U.S.C. § 982(a)(1) - Criminal Forfeiture

A true bill.

Alan Wang Foreman

Filed in open court this 24th day of
April, 2014

Juliana Clerk

Bail, \$ no process
Kandis Wisthal

1 MELINDA HAAG (CABN 132612)
United States Attorney

FILED
APR 24 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11
12 UNITED STATES OF AMERICA,)

13 Plaintiff,)

14 v.)

15 ANTHONY KESLINKE,)

16 Defendant.)

No. **CR14-00237**

VIOLATIONS: 18 U.S.C. § 1956(h) –
Conspiracy to Launder Monetary Instruments;
18 U.S.C. § 1956(a)(3)(B) – Money
Laundering; 18 U.S.C. § 982(a)(1) – Criminal
Forfeiture

OAKLAND VENUE

17)
18)
19 INDICTMENT

20 The Grand Jury charges:

21 COUNT ONE: (18 U.S.C. § 1956(h) – Conspiracy to Launder Monetary Instruments)

22 Beginning at a time unknown to the Grand Jury, but no later than June 20, 2013, and continuing
23 through and including February 10, 2014, in the Northern District of California, the defendant,

24 ANTHONY KESLINKE,

25 did knowingly and intentionally conspire with persons known and unknown to the Grand Jury to
26 conduct and attempt to conduct financial transactions affecting interstate commerce involving property
27 represented by law enforcement to be proceeds of specified unlawful activity and property used to
28 conduct or facilitate specified unlawful activity, with the intent to conceal and disguise the nature, the

INDICTMENT

1 location, the source, the ownership, and the control of the property, and that while conspiring to conduct
2 and attempt to conduct such financial transactions, believed the property involved in the financial
3 transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United
4 States Code, Section 1956(h).

5 COUNT TWO: (18 U.S.C. § 1956(a)(3)(B) – Money Laundering)

6 On or about August 27, 2013, in the Northern District of California, the defendant,

7 ANTHONY KESLINKE,

8 with the intent to conceal and disguise the nature, location, source, ownership, and control of property
9 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct
10 a financial transaction affecting interstate and foreign commerce involving property represented by law
11 enforcement to be proceeds of specified unlawful activity and property used to conduct or facilitate
12 specified unlawful activity, to wit: accepting \$55,000 in U.S. currency in exchange for sending a wire
13 transfer of \$50,000 from a financial institution to an account of an undercover federal agent.

14 All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

15 COUNT THREE: (18 U.S.C. § 1956(a)(3)(B) – Money Laundering)

16 On or about September 30, 2013, in the Northern District of California, the defendant,

17 ANTHONY KESLINKE,

18 with the intent to conceal and disguise the nature, location, source, ownership, and control of property
19 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct
20 a financial transaction affecting interstate and foreign commerce involving property represented by law
21 enforcement to be proceeds of specified unlawful activity and property used to conduct or facilitate
22 specified unlawful activity, to wit: accepting \$109,000 in U.S. currency in exchange for sending a wire
23 transfer of \$100,000 from a financial institution to an account of an undercover federal agent.

24 All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

25 COUNT FOUR: (18 U.S.C. § 1956(a)(3)(B) – Money Laundering)

26 On or about October 25, 2013, and November 1, 2013, in the Northern District of California, the
27 defendant,

28 ///

INDICTMENT

1 ANTHONY KESLINKE,

2 with the intent to conceal and disguise the nature, location, source, ownership, and control of property
3 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct
4 a financial transaction affecting interstate and foreign commerce involving property represented by law
5 enforcement to be proceeds of specified unlawful activity and property used to conduct or facilitate
6 specified unlawful activity, to wit: accepting \$108,500 in U.S. currency in exchange for sending two
7 wire transfers totalling \$100,000 from a financial institution to an account of an undercover federal
8 agent.

9 All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

10 COUNT FIVE: (18 U.S.C. § 1956(a)(3)(B) – Money Laundering)

11 Between December 4, 2013, and December 16, 2013, in the Northern District of California, the
12 defendant,

13 ANTHONY KESLINKE,

14 with the intent to conceal and disguise the nature, location, source, ownership, and control of property
15 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct
16 financial transactions affecting interstate and foreign commerce involving property represented by law
17 enforcement to be proceeds of specified unlawful activity and property used to conduct or facilitate
18 specified unlawful activity, to wit: accepting \$109,000 in U.S. currency in exchange for purchasing 23
19 separate cashier's checks and one money order, cumulatively totalling \$100,000, which were purchased
20 from various financial institutions, and then sent through the United States mail to an address provided
21 by an undercover federal agent.

22 All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

23 COUNT SIX: (18 U.S.C. § 1956(a)(3)(B) – Money Laundering)

24 On or about February 6, 2014, in the Northern District of California, the defendant,

25 ANTHONY KESLINKE,

26 with the intent to conceal and disguise the nature, location, source, ownership, and control of property
27 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct
28 financial transactions affecting interstate and foreign commerce involving property represented by law

1 enforcement to be proceeds of specified unlawful activity and property used to conduct or facilitate
2 specified unlawful activity, to wit: accepting \$218,000 in U.S. currency in exchange for sending a wire
3 transfer of \$200,000 from a financial institution to an account of an undercover federal agent.

4 All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

5 FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(1) – Money Laundering Forfeiture Allegation)

6 1. The allegations contained in Counts One through Six of this Indictment are hereby
7 realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18,
8 United States Code, Sections 982(a)(1).

9 2. Upon a conviction for any of the offenses alleged in Counts One through Six, the
10 defendant,

11 ANTHONY KESLINKE,

12 shall forfeit to the United States of America any property, real or personal, involved in such offense, and
13 any property traceable to such property. The property to be forfeited includes, but is not limited to, the
14 following:

- 15 a. \$55,585.95 seized from Fremont Bank account number 12XXX174 on February
16 10, 2014;
- 17 b. \$9,677.14 seized from Fremont Bank account number 12XXX206 on February
18 10, 2014;
- 19 c. \$1,333,254.79 seized from Merrill Lynch account number 29F-XXX494 on
20 February 10, 2014, plus accrued interest; and
- 21 d. \$323,910.00 in United States currency seized from 951 La Gonda Way, Danville,
22 California, on February 10, 2014;
- 23 e. 500 American Silver Eagle coins seized from 951 La Gonda Way, Danville,
24 California, on February 10, 2014; and
- 25 f. One Tiffany diamond solitaire ring seized from 951 La Gonda Way, Danville,
26 California, on February 10, 2014.

27 3. If, as a result of any act or omission of the defendants, any of said property

- 28 a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to or deposited with, a third person;
- 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, without difficulty cannot be subdivided;

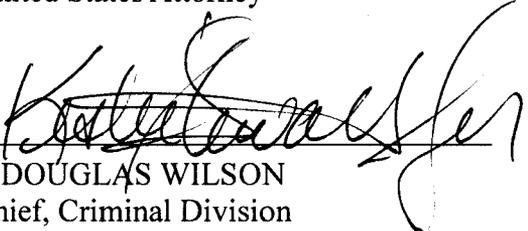
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

DATED: April 24, 2014

A TRUE BILL.


 FOREPERSON

MELINDA HAAG
 United States Attorney


 J. DOUGLAS WILSON
 Chief, Criminal Division

(Approved as to form: 
 AUSA AARON D. WEGNER