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PATRICK D. ROBBINS (CABN 152288)
Attorney for the United States

FILED

Jul 18 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NO. 3:23-cr-00221 JSC
)
Plaintiff,) VIOLATIONS:
)
v.) 18 U.S.C. § 1349 – Conspiracy to Commit
) Honest Services Wire Fraud;
Z&L PROPERTIES, INC.,) 18 U.S.C. §§ 1343, 1346 – Honest Services
) Wire Fraud;
Defendant.)
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INFORMATION

The Attorney for the United States charges:

RELEVANT PARTIES AND ENTITIES

1. At all times relevant to this Information, Defendant Z&L Properties, Inc. was a real estate development company based in Foster City, California. Z&L Properties managed the development of a mixed-use commercial and residential property located at 555 Fulton Street in San Francisco, California (“555 Fulton”).

2. At all times relevant to this Information, Zhang Li was the chairman, co-founder, and chief executive officer of a real estate holdings and development company based in Guangzhou, China. In 2016, Zhang formed defendant company Z&L Properties for the purpose of managing construction and development projects in San Francisco and elsewhere, including the project at 555 Fulton.

1 3. At all times relevant to this Information, Mohammed Nuru (“Nuru”) was the Director of
2 San Francisco Public Works, also known as the Department of Public Works (“DPW”) of the City and
3 County of San Francisco. As Director of DPW, Nuru had significant authority and influence over
4 permitting and approvals for contracts and construction projects in San Francisco. Nuru also had
5 significant influence with other San Francisco city agencies and departments with authority over
6 building construction permitting and regulation, including the San Francisco Department of Building
7 Inspection. Among other things, Nuru could approve, deny, or otherwise take official actions affecting
8 building and construction permits and authorizations that would affect the project at 555 Fulton.

9 4. At all times relevant to this Information, Walter Wong was a contractor, developer and
10 “permit consultant,” as that term is defined in the San Francisco Campaign and Governmental Conduct
11 Code. Wong owned and operated numerous construction and construction-related companies from his
12 offices in San Francisco. Through these companies, Wong did business with numerous San Francisco
13 agencies, including DPW. At all times relevant to this Information, Wong served as a “permit
14 consultant” for Z&L Properties’ project at 555 Fulton.

15 THE HONEST SERVICES FRAUD SCHEME AND CONSPIRACY

16 5. Beginning on a date unknown, but no later than November 2018, and continuing until on
17 or about January 28, 2020, in the Northern District of California and elsewhere, Z&L Properties, Zhang,
18 Nuru, Wong, and others participated in, devised, and intended to devise a conspiracy and a scheme and
19 artifice to defraud the public of its right to the honest services of a public official through bribery in
20 breach of Nuru’s fiduciary duty. The scheme and conspiracy were carried out by means of materially
21 false and fraudulent pretenses, representations, and promises, and by means of omission and
22 concealment of material facts.

23 6. As part of the scheme to defraud the public of its right to the honest services of Nuru,
24 Z&L Properties, along with Zhang, Wong, and others known and unknown, helped direct a stream of
25 benefits from Z&L Properties and Zhang to Nuru, including payments for food, drink, transportation,
26 and lodging for Nuru and another individual during a trip they took to China in 2018. The purpose of
27 this stream of payments and benefits was to influence Nuru to act in Z&L Properties’ favor as
28 opportunities arose, and to have Nuru take official action and exercise official influence in Z&L

1 Properties' favor in exchange for such payments and benefits.

2 7. At all times relevant to this Information, Zhang was a director and beneficial owner of
3 Z&L Properties and acted an agent of and exerted control over Z&L Properties.

4 8. During the relevant time period, and in furtherance of the honest services wire fraud
5 scheme and conspiracy, Z&L Properties, through Zhang and others, communicated with Nuru regarding
6 the development of 555 Fulton by mobile application messages, using interstate and foreign wire
7 communications.

8 COUNT ONE: (18 U.S.C. § 1349 – Conspiracy to Commit Honest Services Wire Fraud)

9 9. Paragraphs 1 through 8 of this Information are re-alleged and incorporated as if fully set
10 forth herein.

11 10. Beginning no later than in or about November 2018, and continuing through on or about
12 January 28, 2020, in the Northern District of California and elsewhere, the defendant,

13 Z&L PROPERTIES, INC.,

14 and Nuru, Wong, Zhang, and others known and unknown, did knowingly conspire to commit honest
15 services wire fraud, that is, to devise and intend to devise a scheme and artifice to defraud as to a
16 material matter and to obtain money and property by means of materially false and fraudulent pretenses,
17 representations, and promises, and by omission and concealment of material facts, in order to deprive
18 the people of San Francisco of their right to the honest and faithful services of Nuru through bribery,
19 and, for the purpose of executing such scheme or artifice and attempting to do so, did transmit, and
20 cause to be transmitted, by means of wire communication in interstate and foreign commerce, certain
21 writings, signs, signals, pictures, and sounds, in violation of 18 U.S.C. §§ 1343, 1346.

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

23 COUNT TWO: (18 U.S.C. §§ 1343, 1346 –Honest Services Wire Fraud)

24 11. Paragraphs 1 through 8 of this Information are re-alleged and incorporated as if fully set
25 forth herein.

26 12. Beginning no later than in or about November 2018, and continuing through on or about
27 January 28, 2020, in the Northern District of California and elsewhere, the defendant,

28 Z&L PROPERTIES, INC.,

1 knowingly and with the intent to defraud participated in, devised, and intended to devise a scheme and
2 artifice to defraud as to a material matter, and to obtain money and property by means of materially false
3 and fraudulent pretenses, representations, and promises, and by means of omission and concealment of
4 material facts, in order to deprive the people of San Francisco of their right to the honest and faithful
5 services of Nuru through bribery, and for the purpose of executing the scheme and artifice to defraud did
6 knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of a wire
7 communication, certain writings, signs, signals, pictures, and sounds, specifically, a December 3, 2019
8 mobile electronic communication sent from Zhang to Nuru in which Zhang asked Nuru to arrange a city
9 inspection related to the project at 555 Fulton.

10 All in violation of Title 18, United States Code, Sections 1343 and 1346.

11
12 DATED: July 18, 2023

PATRICK D. ROBBINS
Attorney for the United States

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15 /s/ David J. Ward
DAVID J. WARD
Assistant United States Attorney
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