AO 257 (Rev. 6/78)

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

BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT ☐ SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

FILED
FEB 11 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

## OFFENSE CHARGED

18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud

☐ Petty
☐ Minor
☐ Misde-meanor
☒ Felony

PENALTY: 30 years' imprisonment, $1,000,000 fine , 5 years' supervised release, $100 special assessment

E-Filing

## DEFENDANT - U.S

YASUHIRO WATANABE

DISTRICT COURT NUMBER
CR14-00071 JST

## PROCEEDING

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

FEDERAL BUREAU OF INVESTIGATION

☐ 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 reprosecution 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

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under
MAGISTRATE CASE NO. 4-13-71326 MAG

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): AUSA THOMAS E. STEVENS

## DEFENDANT

### IS *NOT* IN CUSTODY

1) ☐ Has not been arrested, pending outcome this proceeding. 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)

### 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

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:

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

THOMAS E. STEVENS (CABN 168362)
Assistant United States Attorney
1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
FAX: (510) 637-3724
Thomas.Stevens@usdoj.gov

Attorneys for United States of America

FILED
FEB 11 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

E-Filing

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

| | |
|---|---|
| UNITED STATES OF AMERICA, Plaintiff, v. YASUHIRO WATANABE, Defendant. | NO. CR14-00071 JST<br>VIOLATION: 18 U.S.C. § 1349 (Conspiracy To Commit Bank Fraud)<br>OAKLAND VENUE |

INFORMATION

The United States Attorney's Office charges that:

1. Defendant YASUHIRO WATANABE was a citizen of Japan. Compass Bank and Bank of America were federally chartered and insured banks with branches located in the Northern District of California and elsewhere.

2. From 2009 through September 4, 2013, WATANABE recruited individuals to travel with him from Japan to the United States to defraud Compass Bank and Bank of America.

3. WATANABE and his coconspirators opened bank accounts at Compass Bank and Bank of America branch offices located in the Northern District of California and in other states. Once the

accounts were opened, WATANABE funded the accounts by causing an international wire transfer to be made from bank accounts in Japan, to the newly-opened accounts.

4. WATANABE returned to Japan and used debit cards linked to the accounts to purchase goods valued in amounts in excess of the funds then on deposit, when WATANABE knew that these purchases would cause the accounts to become overdrawn and that the banks would suffer financial losses.

COUNT ONE (18 U.S.C. § 1349): Conspiracy to Commit Bank Fraud

5. The allegations in Paragraphs 1 through 4 above are re-alleged and incorporated as if fully set forth here.

6. From in or about 2009, and continuing through September 3, 2013, in the Northern District of California and elsewhere, the defendant,

YASUHIRO WATANABE,

and others known and unknown to the United States Attorney, did conspire and agree together and with one another to commit offenses against the United States, namely, bank fraud, in violation of 18 U.S.C. Section 1344.

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

MELINDA HAAG
United States Attorney

Dated: February 11, 2014

for
J. DOUGLAS WILSON
Chief, Criminal Division

Approved as to form:

THOMAS E. STEVENS
Assistant United States Attorney