

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

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

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

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

E-Filing

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

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

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

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

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 Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☒ On this charge5) ☐ 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)
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Attorneys for United States of America

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

YASUHIRO WATANABE,

Defendant.

) NO.

) VIOLATION: 18 U.S.C. § 1349 (Conspiracy To
) Commit Bank Fraud)

) OAKLAND VENUE
)

CR14-00071 JST

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

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

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

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

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

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

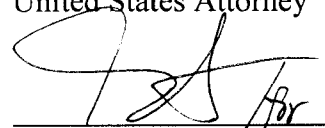
11 YASUHIRO WATANABE,

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

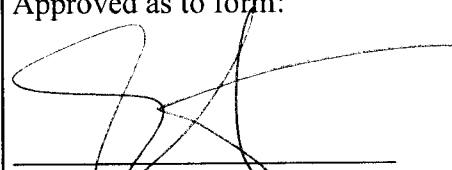
15 All in violation of Title 18, United States Code, Section 1349.

16 MELINDA HAAG
17 United States Attorney

18 Dated: February 11, 2014

19 
20 J. DOUGLAS WILSON
21 Chief, Criminal Division

22 Approved as to form:

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24 THOMAS E. STEVENS
25 Assistant United States Attorney

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CR _____