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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 CONSTANTIN BOBI SANDU,
15 aka Bobi Sandu,
16 aka Ionut Mihai,
17 aka Constantin Sandu,
18 Defendant.
19
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Case No. 23cr386-LAB
23MJ0697-AHG

I N F O R M A T I O N

Title 18, U.S.C. § 1349 -
Conspiracy to Commit Wire
Fraud;

Title 18 U.S.C. § 1956(h)) -
Conspiracy to Launder Monetary
Instruments;

Title 18 U.S.C. §§ 981(a)(1)(C)
and 982(a)(1), and Title 28,
U.S.C. § 2461(c) - Criminal
Forfeiture

21 The United States Attorney charges:

22 **Count 1**

23 Beginning in or about September 2020, and continuing to in or about
24 August 2022, in the Southern District of California, and elsewhere,
25 Defendant CONSTANTIN BOBI SANDU, Aka Bobi Sandu, Aka Ionut Mihai, Aka
26 Constantin Sandu, knowingly and intentionally conspired and agreed with
27 other persons known and unknown, to commit wire fraud in violation of
28 Title 18, United States Code, Section 1343; all in violation of United
States Code Section 1349.

JSCH:San Diego
3/16/23

Count 2

Beginning in or about September 2020, and continuing to in or about August 2022, in the Southern District of California, and elsewhere, Defendant CONSTANTIN BOBI SANDU, Aka Bobi Sandu, Aka Ionut Mihai, Aka Constantin Sandu, knowingly conspired and agreed with other persons known and unknown, to commit the following money laundering offense: to transport, transmit and transfer and attempt to transport, transmit and transfer monetary instruments and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is violations of Conspiracy to Commit Wire Fraud in violation of 18 U.S.C. § 1349; all in violation of Title 18, United States Code, Section 1956(a)(2)(A).

All in violation of Title 18, United States Code, Section 1956(h).

Criminal Forfeiture Allegations

1. The allegations contained in Counts 1 and 2 are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, § 1349 set forth in Count 1 of this Information, defendant, CONSTANTIN BOBI SANDU, aka Bobi Sandu, aka Ionut Mihai, aka Constantin Sandu, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real and or personal, which constitutes and is derived from proceeds traceable to the offense. The property to be forfeited shall include but is not limited to, a money judgment in favor of the United States in an amount equal to the total amount of proceeds obtained directly or indirectly as a result of the offense.

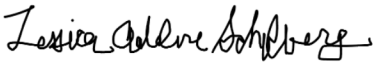
1 3. Upon conviction of the offense in violation of Title 18 U.S.C.
2 § 1956(h) as set forth in Count 2 of this Information, defendant,
3 CONSTANTIN BOBI SANDU, aka Bobi Sandu, aka Ionut Mihai, aka Constantin
4 Sandu, shall forfeit to the United States of America, pursuant to Title
5 18, United States Code, Section 982(a)(1), any property, real and
6 personal, involved in the offense and any property traceable to such
7 property.

8 4. If any of the property described above, as a result of any
9 act or omission of the defendant:

- 10 a. cannot be located upon the exercise of due diligence;
11 b. has been transferred or sold to, or deposited with, a
12 third party;
13 c. has been placed beyond the jurisdiction of the court;
14 d. has been substantially diminished in value; or
15 e. has been commingled with other property which cannot be
16 divided without difficulty, the United States of America shall be
17 entitled to forfeiture of substitute property pursuant to Title 18,
18 United States Code, Section 982(b) and Title 28, United States Code,
19 Section 2461(c).

20 DATED: 3/16/2023.

21 RANDY S. GROSSMAN
22 United States Attorney

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24 JESSICA ADELINE SCHULBERG
25 Assistant U.S. Attorney
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