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7 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA
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10 The United States Attorney charges:

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

Case No. 23CR0386-LAB

I N F O R M A T I O N
Superseding

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

Title 18 U.S.C. § 1956(a)(2)(A) -
Laundering 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

20
21 Count 1

22 Beginning in or about September 2020, and continuing to in or about
23 August 2022, in the Southern District of California, and elsewhere,
24 Defendant CONSTANTIN BOBI SANDU, Aka Bobi Sandu, Aka Ionut Mihai, Aka
25 Constantin Sandu, knowingly conspired and agreed with other persons
26 known and unknown, to commit the following money laundering offense: to
27 transport, transmit and transfer and attempt to transport, transmit and
28 transfer monetary instruments and funds from a place in the United

JSCH:San Diego
6/28/23

1 States to and through a place outside the United States with the intent
2 to promote the carrying on of specified unlawful activity, that is
3 violations of Conspiracy to Commit Wire Fraud in violation of 18 U.S.C.
4 § 1349; all in violation of Title 18, United States Code, Sections
5 1956(a)(2)(A) and (h).

6 Count 2

7 Beginning in or about July 2020, and continuing to in or about
8 August 2022, in the Southern District of California, and elsewhere,
9 Defendant CONSTANTIN BOBI SANDU, aka Bobi Sandu, Aka Ionut Mihai, Aka
10 Constantin Sandu, knowingly and intentionally conspired and agreed with
11 other persons known and unknown, to commit wire fraud in violation of
12 Title 18, United States Code, Section 1343; all in violation of United
13 States Code Section 1349.

14 Count 3

15 On or about August 10, 2021, defendant CONSTANTIN BOBI SANDU, aka
16 Bobi Sandu, Aka Ionut Mihai, Aka Constantin Sandu, transported,
17 transmitted, and transferred a monetary instrument and funds from a
18 place in the United States to a place outside the United States—
19 approximately \$2,367.15 USD from a bank account in the United States to
20 a bank account controlled, managed, supervised, directed, and owned by
21 I.T. in Romania—with the intent to promote the carrying on of specified
22 unlawful activity, to wit, Wire Fraud in violation of Title 18, United
23 States Code, Section 1343; all in violation of Title 18, United States
24 Code, Section 1956(a)(2)(A).

25 **Criminal Forfeiture Allegations**

26 1. The allegations contained in Counts 1-3 are re-alleged and
27 incorporated by reference for the purpose of alleging forfeiture to the
28 United States pursuant to Title 18, United States Code, Sections

1 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section
2 2461(c).

3 2. Upon conviction of the offenses set forth in Counts 1 or 3 of
4 this Superseding Information, defendant, CONSTANTIN BOBI SANDU, aka Bobi
5 Sandu, aka Ionut Mihai, aka Constantin Sandu, shall forfeit to the United
6 States of America all their rights, title, and interest, pursuant to
7 Title 18, United States Code, Section 982(a)(1), in any property, real
8 and personal, involved in the offense and any property traceable to such
9 property.

10 3. Upon conviction of the offense set forth in Count 2 of this
11 Superseding Information, defendant, CONSTANTIN BOBI SANDU, aka Bobi
12 Sandu, aka Ionut Mihai, aka Constantin Sandu, shall forfeit to the United
13 States of America all their rights, title, and interest, pursuant to
14 Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United
15 States Code, Section 2461(c), in any property, real and personal, which
16 constitutes and is derived from proceeds traceable to the offense.

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

- 19 a. cannot be located upon the exercise of due diligence;
20 b. has been transferred or sold to, or deposited with, a
21 third party;
22 c. has been placed beyond the jurisdiction of the court;
23 d. has been substantially diminished in value; or
24 e. has been commingled with other property which cannot be
25 divided without difficulty, the United States of America shall be
26 entitled to forfeiture of substitute property pursuant to Title 21,
27 United States Code, Section 853(p), Title 18, United States Code, Section
28 982(b) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 21, United States Code, Sections 981(a)(1)(C),
982(a)(1), and 982(b), and Title 28, United States Code, Section 2461(c).

DATED: 7/8/2023 .

RANDY S. GROSSMAN
United States Attorney



JESSICA ADELINE SCHULBERG
Assistant U.S. Attorney