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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY: *W* DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

April 2018 Grand Jury

**18 CR 3070 JLS**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 LUKE CHRISTOPHER ZOUVAS,  
15 Defendant.

Case No. \_\_\_\_\_  
I N D I C T M E N T  
Title 18, U.S.C.,  
Sec. 1956(a)(3)(B) - Money  
Laundering; Title 18, U.S.C.,  
Secs. 982(a)(1) and 982(b) -  
Criminal Forfeiture

18 The grand jury charges:

19 INTRODUCTORY ALLEGATIONS

20 1. The defendant LUKE CHRISTOPHER ZOUVAS, (ZOUVAS), is a licensed  
21 attorney and operates a law office in San Diego, California. ZOUVAS  
22 maintains a client trust account and a client escrow account with Wells  
23 Fargo Bank.

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28 // CE: PRETRIAL

*1 NAH*

Counts 1-8

18 U.S.C. § 1956(a)(3)(B)

2. On or about the dates indicated below, within the Southern District of California and elsewhere, the defendant LUKE CHRISTOPHER ZOUVAS, with the intent to conceal and disguise the nature, location, source, ownership and control, of property believed to be the proceeds of specified unlawful activity, did knowingly conduct the following financial transactions affecting interstate commerce involving property represented by a person at the direction of, and with the approval of, a law enforcement officer, to be proceeds of specified unlawful activity, to wit: fraud in the sale of securities:

Count	Date	Transaction	Amount
1	November 13, 2017	Wire transmission from City National Bank account x-8609 to Wells Fargo Zouvas Client Account	\$40,000
2	November 17, 2017	Wire transmission from City National Bank account x-8609 to Wells Fargo Zouvas Client Account	\$60,000
3	November 28, 2017	Wire transmission from Wells Fargo Zouvas Client Account to City National Bank account x-7084	\$81,000
4	December 1, 2017	Wire transmission from Wells Fargo Zouvas Client Account to City National Bank account x-7084	\$81,000
5	December 7, 2017	Wire transmission from City National Bank account x-8609 to Wells Fargo Zouvas Client Account	\$90,000

Count	Date	Transaction	Amount
6	December 19, 2017	Wire transmission from City National Bank account x-8609 to Wells Fargo Zouvas Client Account	\$100,000
7	January 5, 2018	Wire transmission from Wells Fargo Zouvas Client Account to City National Bank account x-7084	\$74,700
8	March 5, 2018	Wire transmission from City National Bank account x-6797 to Wells Fargo Zouvas Client Account	\$60,000

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

FORFEITURE ALLEGATION

3. Upon conviction of one or more of the offenses alleged in Counts 1 through 8, and pursuant to Title 18, United States Code, Section 982(a)(1), the defendant LUKE CHRISTOPHER ZOUVAS shall forfeit to the United States all rights, title and interest in any and all property involved in such offenses, and any property traceable to such property, including but not limited to \$64,300.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant -

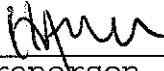
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

1 it is the intent of the United States, pursuant to Title 18, United  
2 States Code, Section 982(b), to seek forfeiture of any other property  
3 of the defendant up to the value of the said property listed above as  
4 being subject to forfeiture.


5 All pursuant to Title 18, United States Code, Sections 982(a)(1)  
6 and 982(b).


7 DATED: June 29, 2018.

8 A TRUE BILL:

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10 \_\_\_\_\_  
Foreperson

11 ADAM L. BRAVERMAN  
12 United States Attorney

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14 By:   
AARON P. ARNZEN  
15 Assistant U.S. Attorney

16  
17 By:   
ANDREW J. GALVIN  
18 Assistant U.S. Attorney

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