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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER KAZUO KAMON,

Defendant.

CR No. 2:23-cr-00024-JLS

I N F O R M A T I O N

[18 U.S.C. § 1343: Wire Fraud; 18
U.S.C. § 981(a)(1)(C) and 28
U.S.C. § 2461(c): Criminal
Forfeiture]

The United States Attorney charges:

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Girardi Keese was a law firm located in Los Angeles, California, that primarily represented plaintiffs in personal injury cases. On or about December 18, 2020, after a series of civil lawsuits publicly alleged that Girardi Keese had misappropriated client funds, certain creditors of Girardi Keese commenced an involuntary petition for relief under chapter 7 of Title 11 of the United States Code against Girardi Keese. On or about January 13, 2021, the Bankruptcy Court entered an Order for Relief Under Chapter 7 and ordered the appointment of a Chapter 7 Trustee.

1 2. Defendant CHRISTOPHER KAZUO KAMON was a resident of Palos
2 Verdes and Encino, California. From in or about 2004 until in or
3 about December 2020, defendant KAMON was the Controller and Chief
4 Financial Officer ("CFO") of Girardi Keese, from which position he
5 oversaw the law firm's financial affairs, supervised its accounting
6 department, and was in charge of paying the firm's expenses. As
7 Girardi Keese's Controller and CFO, defendant KAMON had a duty to
8 keep accurate books and records of the firm.

9 3. Defendant KAMON had signatory authority on several accounts
10 maintained by Girardi Keese, including two operating accounts,
11 namely, a Torrey Pines Bank account ending in 9821 ("Account 9821")
12 and a Nano Banc account ending in 0096 ("Account 0096"). Defendant
13 KAMON used Account 9821 and Account 0096 to pay Girardi Keese's
14 operating expenses, such as payroll, rent, and other day-to-day
15 costs.

16 4. I.B. owned and controlled a construction company ("Company
17 1"). I.B. maintained and was a signatory on a Nikkei Credit Union
18 account ending in 3989 in the name of Company 1 (the "Company 1
19 Account").

20 B. THE FRAUDULENT SCHEME

21 5. Beginning at least as early as 2015 and continuing through
22 at least in or about December 2020, in Los Angeles County, within the
23 Central District of California, and elsewhere, defendant KAMON,
24 together with others known and unknown to the United States Attorney,
25 knowingly and with the intent to defraud, devised, participated in,
26 and executed a scheme to defraud Girardi Keese as to material
27 matters, and to obtain money and property from Girardi Keese by means
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1 of material false and fraudulent pretenses, representations, and
2 promises, and the concealment of material facts.

3 6. The fraudulent scheme operated, in substance, as follows:

4 a. Defendant KAMON used his position as CFO of Girardi
5 Keese to knowingly and intentionally embezzle funds in the custody
6 and control of Girardi Keese and divert those misappropriated funds
7 for his own personal enrichment and the enrichment of others.

8 b. Defendant KAMON recruited co-schemers, including I.B.,
9 to pose as "vendors" who were providing goods and services to Girardi
10 Keese.

11 c. Defendant KAMON caused the supposed vendors to issue
12 fraudulent invoices to Girardi Keese for goods and services that the
13 vendors purportedly provided to Girardi Keese.

14 d. Defendant KAMON caused Girardi Keese to pay the
15 amounts due on the fraudulent invoices to the vendors. Defendant
16 KAMON maintained the pretense and represented to Girardi Keese that
17 the payments were owed to the vendors by Girardi Keese because they
18 were payments for work purportedly performed for the benefit of
19 Girardi Keese. In fact, as defendant KAMON then knew, the payments
20 defendant KAMON was causing Girardi Keese to make to these supposed
21 vendors were not for goods or services provided to Girardi Keese but
22 instead were for goods and services for the personal benefit of
23 defendant KAMON, including for construction projects at defendant
24 KAMON's personal residences in Palos Verdes and Encino, California.

25 e. Defendant KAMON also issued unauthorized checks on the
26 Girardi Keese operating accounts, including Account 9821 and Account
27 0096, to (i) co-schemers whom defendant KAMON directed to kickback
28 portions of the checks in cash to defendant KAMON, including at times

1 in structured amounts of under \$10,000 in order to evade bank
2 reporting requirements, and (ii) third parties to directly pay for
3 defendant KAMON's personal expenses, including luxury shopping
4 purchases, travel, and escort services.

5 f. As further part of the scheme and in order to conceal
6 his embezzlements from Girardi Keese, defendant KAMON maintained the
7 pretense and falsely represented to Girardi Keese that the payments
8 on the fraudulent invoices and to pay for his personal expenses were
9 proper business expenditures by, for example, causing Girardi Keese
10 to issue IRS Forms 1099 to the co-schemers and record the payments as
11 "leasehold expenses" on the Girardi Keese general ledger.

12 7. Between in or about January 2015 and in or about December
13 2020, through this scheme, defendant KAMON and his co-schemers
14 fraudulently obtained over \$10,000,000 in funds held in the custody
15 of and belonging to Girardi Keese.

16 C. USE OF THE WIRES

17 8. On or about September 20, 2020, in Los Angeles County,
18 within the Central District of California, and elsewhere, defendant
19 KAMON, for the purpose of executing the above-described scheme to
20 defraud, transmitted and caused the transmission of an item by means
21 of wire communication in interstate commerce, namely, check #11625 in
22 the amount of approximately \$4,885.67 from Account 0096 to the
23 Company 1 Account.

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FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1 Pursuant to Rule 32.2 of the Federal Rules of Criminal
2 Procedure, notice is hereby given that the United States of America
3 will seek forfeiture as part of any sentence, pursuant to Title 18,
4 United States Code, Section 981(a)(1)(C) and Title 28, United States
5 Code, Section 2461(c), in the event of defendant CHRISTOPHER KAZUO
6 KAMON's conviction of the offense set forth in this Information.
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9 2. If defendant KAMON is so convicted, he shall forfeit to the
10 United States of America the following:

11 (a) All right, title, and interest in any and all
12 property, real or personal, constituting, or derived from, any
13 proceeds traceable to the offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c),
19 defendant KAMON shall forfeit substitute property, up to the value of
20 the property described in the preceding paragraph if, as the result
21 of any act or omission of defendant KAMON, the property described in
22 the preceding paragraph or any portion thereof (a) cannot be located
23 upon the exercise of due diligence; (b) has been transferred, sold
24 to, or deposited with a third party; (c) has been placed beyond the

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1 jurisdiction of the court; (d) has been substantially diminished in
2 value; or (e) has been commingled with other property that cannot be
3 divided without difficulty.

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