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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
June 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

BOBBY NUNEZ,

Defendants.

CR 2:25-cr-00779-FLA

I N D I C T M E N T

[18 U.S.C. § 641: Theft of Government Property in Excess of \$1,000; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 641]

On or about August 15, 2025, in Los Angeles County, within the Central District of California, defendant BOBBY NUNEZ, knowingly and willfully stole, purloined, and converted to his own use, property of the Department of Homeland Security ("DHS"), a department and agency of the United States, having a value in excess of \$1,000, namely, a vehicle used by DHS law enforcement agents, with the intent to deprive DHS of the use and benefit of the vehicle.

FORFEITURE ALLEGATION

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

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3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 981(a)(1)(C) and Title 28, United States
7 Code, Section 2461(c), in the event of the defendant's conviction of
8 the offenses set forth in this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting, or derived from, any proceeds
13 traceable to any such 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), as
18 incorporated by Title 28, United States Code, Section 2461(c), the
19 defendant, if so convicted, shall forfeit substitute property, up to
20 the total value of the property described in the preceding paragraph
21 if, as the result of any act or omission of said defendant, the
22 property described in the preceding paragraph, or any portion
23 thereof: (a) cannot be located upon the exercise of due diligence;
24 (b) has been transferred, sold to or deposited with a third party;
25 (c) has been placed beyond the jurisdiction of the court; (d) has

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

3
4 A TRUE BILL

5
6 /s/
7 Foreperson

8 BILAL A. ESSAYLI
9 Acting United States Attorney

10 JOSEPH T. MCNALLY
11 Assistant United States Attorney
12 Acting Chief, Criminal Division



13 FRANCES S. LEWIS
14 Assistant United States Attorney
15 Chief, General Crimes Section

16 SHAWN T. ANDREWS
17 Assistant United States Attorney
18 Deputy Chief, General Crimes
19 Section

20 KALI M. YALLOURAKIS
21 Assistant United States Attorney
22 General Crimes Section
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