

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
12-cr-60014-SCOLA/SNOW

Case No. _____
18 U.S.C. § 371
18 U.S.C. § 1028A(a)(1)

UNITED STATES OF AMERICA

vs.

WILSON LAU
and
KATE YUEE LAU,

Defendants.

_____ /

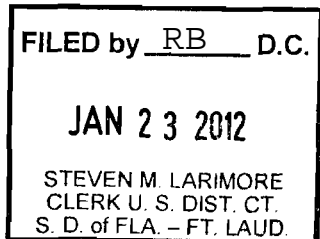
INFORMATION

The United States Attorney charges:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. American Quick Cash Depot was the fictitious business name of a check cashing store registered with and licensed by the State of Florida under various corporate business names.
2. American Quick Cash Depot was operated out of a storefront at 3591 N. Andrews Avenue, Oakland Park, Broward County, Florida.
3. WILSON LAU was the operator of American Quick Cash Depot.
4. KATE YUEE LAU was the wife of WILSON LAU, and worked with her husband at American Quick Cash Depot.



5. Pursuant to Florida Statutes, Section 560.1105, and Florida Administrative Rule 69V-560.704, licensed check cashing stores are required to maintain certain records, including but not limited to copies of the front and back of checks cashed after they are endorsed and, for checks in amounts in excess of \$1,000, a copy of the personal identification presented by the person presenting the check to the check cashing store.

COUNT 1

6. Paragraphs 1 through 5 of the General Allegations are incorporated by reference as though realleged in their entirety herein.

7. Beginning on or about January 1, 2009, the exact date being unknown to the United States Attorney, through on or about June 22, 2011, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

WILSON LAU
and
KATE YUEE LAU,

did knowingly and willfully conspire with each other and with other persons known and unknown to the United States Attorney to commit an offense against the United States, namely:

(a) to knowingly buy, sell, exchange, receive, deliver, retain and conceal, United States Treasury checks, knowing that such Treasury checks were stolen and bore falsely made and forged endorsements and signatures, in violation of Title 18, United States Code, Section 510(b); and

(b) to knowingly receive, conceal and retain any record, voucher, money and thing of value of the United States or of any department thereof, that is, United States Treasury tax refund checks and tax refund anticipation loan checks, with intent to convert them to their own use and gain,

knowing such checks to have been embezzled, stolen, purloined, and converted, and in the aggregate exceeded the sum of \$1,000, in violation of Title 18, United States Code, Section 641.

OBJECT AND PURPOSE OF THE CONSPIRACY

8. It was the object and purpose of the conspiracy for the defendants to unjustly enrich themselves by charging a fee for cashing fraudulently obtained United States Treasury tax refund checks and tax refund anticipation loan checks bearing falsely made and forged endorsements.

OVERT ACTS

9. In furtherance of the conspiracy and to achieve the object and purpose thereof, at least one of the co-conspirators committed and caused to be committed, in the Southern District of Florida, at least one of the following overt acts, among others:

(i) On or about May 11, 2011, WILSON LAU cashed a United States Treasury tax refund check bearing a falsely made and forged endorsement, check number 2310 58763722, payable to a person identified as "D.A.", in the amount of \$5,415.

(ii) On or about May 11, 2011, KATE YUEE LAU wrote the date on a photocopy of a United States Treasury tax refund check bearing a falsely made and forged endorsement, check number 2310 58763722, with a colored marker.

(iii) On or about June 22, 2011, WILSON LAU cashed a United States Treasury tax refund check bearing a falsely made and forged endorsement, check number 2310 52680878, payable to a person identified as "E.M.", in the amount of \$9,391.

(iv) On or about June 22, 2011, KATE YUEE LAU wrote the date on a photocopy of a United States Treasury tax refund check bearing a falsely made and forged endorsement, check number 2310 52680878, with a colored marker.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

10. Paragraphs 1 through 5 of the General Allegations are incorporated by reference as though realleged in their entirety herein.

11. On or about June 22, 2011, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

WILSON LAU,

during and in relation to a felony violation of Title 18, United States Code, Section 641, that is, receiving, concealing, and retaining any thing of value of the United States or of any department thereof, that is, United States Treasury tax refund check number 2310 52680878, payable to a person identified as "E.M.", with intent to convert it to his own use and gain, knowing such check to have been embezzled, stolen, purloined, and converted, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely, a social security number, xxx-xx-1407, belonging to a person identified as "E.M.", the payee of such check, in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATIONS

1. The allegations of Count 1 of this Information are re-alleged and, by this reference, fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

2. Upon conviction of a conspiracy to commit a violation of Title 18, United States Code, Section 510, pursuant to Title 18, United States Code, Section 371, as alleged in Count 1 of this Information, the defendants, WILSON LAU and KATE YUEE LAU, shall forfeit to the United States all of their respective right, title and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to such violation and any and all property used or intended to be used in any manner or part to commit or facilitate the commission of such violation, pursuant to Title 18, United States Code, Section 981(a)(2)(B), and Section 492, as incorporated by Title 28, United States Code, Section 2461(c), and the procedures set forth at Title 21, United States Code, Section 853.

A. The property subject to forfeiture includes, but is not limited to:

- (i) A money judgement in the amount of approximately \$5,262,297;
- (ii) Approximately \$53,952.01 in U.S. currency.

3. Upon conviction of a conspiracy to commit a violation of Title 18, United States Code, Section 641, pursuant to Title 18, United States Code, Section 371, as alleged in Count 1 of this Information, the defendants, WILSON LAU and KATE YUEE LAU, shall forfeit to the United States all of their respective right, title and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to such violation, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c), and the procedures set forth at Title 21, United States Code, Section 853.


A. The property subject to forfeiture includes, but is not limited to:

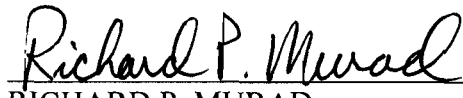
- (i) A money judgement in the amount of approximately \$5,262,297;
- (ii) Approximately \$53,952.01 in U.S. currency.

4. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants,

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.


WIFREDO A. FERRER
UNITED STATES ATTORNEY


RICHARD P. MURAD
ASSISTANT UNITED STATES ATTORNEY