

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

SEP 07 2022

U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 TUONG QUOC HO,)
 A/K/A "ROBERT PARKER",)
 A/K/A "HOQUOCTUONG",)
)
 Defendant.)

CAUSE NO.: 1:20-CR-00056-JRS-TAB

SUPERSEDING INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS FOR ALL COUNTS

At times material to all Counts of this Superseding Indictment:

The Defendant

1. TUONG QUOC HO, A/K/A "ROBERT PARKER", A/K/A "HOQUOCTUONG" ("HO"), was a dual citizen of the United States and Vietnam, who resided in Carmel, Indiana. HO was also associated with two other residences in Indianapolis, Indiana.
2. Beginning in or about 2013 and continuing until at least on or about February 20, 2020, HO, along with others known and unknown to the Grand Jury, devised and intended to devise a scheme or artifice to defraud, and to obtain money or property by means of false or fraudulent pretenses, representations, and promises, from individuals and entities worldwide, including PayPal, eBay, eBay buyers, suppliers, financial institutions and credit card companies,

credit card holders, and identity theft victims (the “Scheme”).

3. To carry out the Scheme, HO obtained unauthorized personally identifiable information (“PII”) of other persons, including but not limited to, their names, addresses, dates of birth, and social security numbers, and credit card numbers. HO used that PII to create accounts with PayPal, a payment processor, and eBay, an online auction site, all of which were in the names of other persons. In multiple instances, items sold at auction to eBay buyers were purchased with unauthorized credit cards and shipped directly from the true supplier to the eBay buyer.

4. HO also used that PII to generate and submit to PayPal fraudulent documents in the names of those other persons, including identification documents (driver’s licenses, passports, social security cards), proof of address documents (utility bills, bank statements), and proof of sales documents (invoices, receipts). This was intended to mislead PayPal about the identity of the person who opened and maintained the accounts, as well as the true source of the items being sold on eBay.

5. These fraudulent representations to PayPal enabled HO to continue to use PayPal as a platform to obtain and transfer money.

6. HO was responsible for maintaining and controlling the bank accounts linked to the false and fraudulent PayPal accounts. These bank accounts received deposits from over 500 PayPal accounts, totaling over \$2 million.

PayPal and eBay

7. PayPal was a worldwide payments system that supported online money transfers and served as an electronic alternative to traditional paper methods, such as checks and money orders. PayPal operated as a payment processor for online vendors, auction sites, and many

other commercial users, including eBay, an online auction site.

8. PayPal offered two different types of accounts – personal and business accounts. A personal account was recommended for individuals who shop and pay online. Personal accounts include premier accounts, which were recommended for casual sellers or non-businesses who wished to get paid online and who also made online purchases. A business account was recommended for merchants who operated under a company/group name.

9. A PayPal user could create a PayPal account by entering an email address and password. PayPal would then verify the email address.

10. A PayPal user would then register the account by using personal information, such as a name, address, and phone number. PayPal required the user to provide a social security number under certain circumstances.

11. To open an account, a PayPal user must agree to comply with PayPal's policies, including a User Agreement and Privacy Statement.

12. If a PayPal user wished to receive or transfer money through PayPal, that user was required to link a bank account to the PayPal account.

- a. If the user's bank was one listed on the PayPal registration website, the PayPal users had the option to enter their online banking login information to automatically link the bank account to the PayPal account.
- b. If the user's bank was not listed on the PayPal website, the PayPal users had to enter a bank account number and routing number. PayPal would then confirm the bank account by making two small deposits into the account, totaling less than a dollar. The PayPal user would need to enter those two values in order to confirm the identity of user was the owner or has authority to use that bank

account.

13. PayPal could also be used to manage credit cards, debit cards, and prepaid gift cards, allowing the user to checkout from websites without having to enter their card information each time. The PayPal user would link the card number, expiration date, and security code to the PayPal account. PayPal required that the name on the card matched the legal name entered when the user created their PayPal account.

14. eBay was an online auction and shopping platform that allowed individuals and businesses to buy and sell a wide variety of goods and services worldwide.

15. eBay buyers placed bids on items that the buyer wanted to purchase. Once the eBay buyer placed a bid on an item, that buyer entered a contractual agreement to buy the item if the buyer won the auction.

16. If an eBay buyer won the auction, the buyer could pay for the item on eBay's website using a variety of methods, including electronic payment services like PayPal. If the eBay seller used PayPal as a method of payment, the buyer's funds would be transferred to the seller's PayPal account after the buyer won the action.

17. The seller could then transfer the money to the seller's linked bank account, have a check mailed from PayPal, or spend the money directly from the PayPal account.

18. Uploading documents to PayPal used facilities of interstate or foreign commerce and was in or affecting such commerce.

Definitions

19. The term "PII", as used herein, was any information related to identifying a person, including but not limited to their names, social security numbers, dates and places of birth, and addresses.

20. The term “means of identification” was defined as “any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including any name, social security number, date of birth, official State or government issued driver’s license or identification number . . .”. 18 U.S.C. § 1028(d)(7).

21. The term “access device” was defined as “any card, plate, code, account number, electronic serial number, mobile identification number, personal identification number, or other telecommunications service, equipment, or instrument identifier, or other means of account access that can be used, alone or in conjunction with another access device to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument)”. 18 U.S.C. § 1029(e)(1).

22. Skype was an online social media messaging application and platform. Communications through Skype and email used facilities of interstate or foreign commerce and were in or affecting such commerce.

The Scheme

A. Possession and Use of PII

23. From in or about 2013 through on or about February 20, 2020, HO unlawfully obtained PII through the Internet of hundreds of persons located throughout the United States and worldwide (the “PII Victims”). This PII included, among other things, their names, addresses, dates of birth, telephone numbers, and social security account numbers. The PII was all in the names of other persons.

24. HO used PII of others, including their social security account numbers, to open PayPal and eBay accounts in the names of those other persons, including PII Victims.

25. In furtherance of the Scheme, HO linked his personal bank accounts to these

PayPal accounts to receive and transfer payments made to those accounts. HO represented to PayPal that the bank accounts were opened in the name of the PayPal account. However, the bank accounts were actually registered in HO's true name.

26. HO's personal bank accounts were linked to over five hundred (500) PayPal accounts.

27. PayPal verified the bank accounts linked to the PayPal accounts by making the two small deposits into the account totaling less than a dollar. HO was required to provide the deposit amount information to PayPal to verify the account. PayPal confirmed a majority of those linked bank accounts.

B. Possession and Use of Unauthorized Credit Cards

28. The eBay accounts advertised and sold a variety of items through the online auction site, including, but not limited to, sporting goods, handbags, electronics, and health equipment, such as Hydro Flask water bottles, Vera Bradley handbags, Superfeet insoles, PlayStation 4 controllers/accessories, American Girl dolls, and blood pressure monitoring devices. Most of the items were sold at prices lower than market value.

29. In multiple instances, the sellers used unauthorized or stolen credit card numbers to purchase the items sold from the eBay accounts. Those items were then shipped directly from the actual supplier to the buyer.

30. From in or about 2013 through on or about February 20, 2020, HO obtained credit card information of thousands of individuals located throughout the United States and worldwide from individuals on the internet. HO also obtained this credit card information from unlawful websites that sell credit card information of other persons. All of the credit card information that HO obtained was in the names of other persons.

31. HO shared this credit card information with others on the Internet through Skype, email, and other social media applications.

32. HO communicated with co-conspirators over Skype about obtaining and using unauthorized credit cards to purchase items sold through the eBay auctions. On at least one occasion, HO asked another individual to purchase items with unauthorized credit cards and have some of those items shipped to HO's residence. HO disclosed that he could re-sell the items. HO also requested that the packages be shipped to his residence in names other than himself.

33. On or about October 24, 2018, HO possessed over 400 packages of merchandise in residences that HO controlled and accessed.

34. HO signed for many of those packages in other names, including "Robert Parker".

35. At least \$78,000 of those items were confirmed to be purchased with unauthorized credit cards of others.

C. Receipt and Upload of False and Fraudulent Documents

36. PayPal received complaints from individuals who purchased items from the eBay accounts. For instance, in one complaint, the buyer alleged that the eBay seller purchased the items being sold on eBay with stolen credit card information. In another complaint, the buyer alleged that the eBay seller shipped the purchased items to the buyer directly from the actual supplier.

37. PayPal restricted or limited many of the PayPal accounts because of suspicious activity on the accounts, the complaints, and other reasons.

38. PayPal required the users of those restricted/limited PayPal accounts to provide PayPal with additional documents or information to re-establish the account. PayPal sometimes required the account holders to provide additional documentation for other reasons, such as when

the account reached a total transaction limit.

39. The documentation requested included copies of valid identification documents (i.e., driver's license, passport, social security cards), proof of address documents (i.e., utility bills, telephone bills), and proof of sales documents (i.e., invoices, receipts). Invoices and receipts would assist PayPal in verifying that the seller had the items the seller was purporting to sell.

40. In furtherance of the Scheme, HO obtained fraudulent documents on the Internet to attempt to re-establish PayPal accounts that were either limited or restricted by PayPal, or that required additional documentation. The documents HO obtained included false and fraudulent driver's licenses, passports, social security cards, utility bills, telephone bills, bank statements, receipts, and invoices in the name of the PayPal accountholders.

41. HO also modified and altered authentic documents, such as his personal utility bills, to make them appear to be for the PayPal accountholders.

42. HO uploaded and caused to be uploaded many of these false and fraudulent documents to PayPal through the Internet, in or affecting interstate or foreign commerce.

43. On occasions, PayPal lifted the restriction, and enabled HO to continue using those PayPal accounts.

44. HO and others controlled and shared access to the PayPal and eBay accounts. HO and others used various methods to obscure the location and identity of the person accessing the PayPal and eBay accounts.

D. Receipt of the Proceeds of the Scheme

45. The proceeds from the sales in those eBay accounts flowed through to the PayPal accounts.

46. HO and others who had access to the PayPal accounts periodically transferred the money from the PayPal accounts to HO's linked personal bank accounts in HO's custody and control. HO also received checks directly from PayPal and made payments from the PayPal accounts.

47. HO had access to, shared, wrote to, and maintained spreadsheets to keep track of the payments, sales, tracking numbers, and money transfers pertaining to the activity in many of the PayPal accounts.

48. Between 2014 and 2018, over \$2 million was transferred from the PayPal accounts and deposited into HO's personal bank accounts.

49. HO wired approximately \$1.2 million of that money overseas to HO's family members and other individuals in Vietnam, including co-conspirators.

50. HO personally used a portion of those PayPal deposits for his own benefit, including the purchase of his residence in Carmel, Indiana for \$335,442.47.

COUNTS 1 – 20
Wire Fraud
18 U.S.C. §§ 1343 and 2

51. Beginning in or about 2013 and continuing until at least on or about February 20, 2020, as specified in each separate Count below, within the Southern District of Indiana and elsewhere,

TUONG QUOC HO,
A/K/A “ROBERT PARKER”,
A/K/A “HOQUOCTUONG”,

the Defendant herein, having devised and intended to devise a scheme or artifice to defraud, and to obtain money or property by means of false or fraudulent pretenses, representations, and promises, to wit: the Scheme described herein, knowingly and with the intent to defraud, transmitted and caused to be transmitted by means of wire communications in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing the Scheme, including the following wire communications:

HO Uploaded False and Fraudulent Documentation to PayPal:

Count	Date Uploaded (on or about)	PayPal Account Number (last 4 digits)	Name on PayPal Account	Types of Documents Uploaded
1	3/30/15	5949	R.B.	Social Security Card Passport Kreg Supplier Contact Kreg Invoices Plantronics Invoice
2	7/16/15 – 7/22/15	5131	C.A.	IPL Bill Passport
3	9/25/15	3407	M.M.	Passport AT&T Bill

4	12/3/15	0108	F.C.	AMEX Statement Business License Parrot Store Invoice Anki Invoice Florida Am Water Bill Driver's License
5	4/21/16	2289	J.L.	Verizon Statement Driver's License TRX Invoices Academy Invoices
6	4/27/16	4426	K.H.	Driver's License TD Bank Statement Yeti Invoice Verizon Statement
7	7/26/16	0666	J.B.	Hyperice Invoice Social Security Card Maxi Clumber Invoice Driver's License ASG Security Statement
8	11/12/16 – 11/29/16	7760	W.L.	Business Information Sprint Bills Driver's Licenses Worx Invoice Cabela's Invoice
9	11/26/16	6701	J.Z.	Driver's License Social Security Card Verizon Statement Proof of Shipping Supplier Information Business Information
10	1/18/17 – 1/19/17	5620	H.H.	Verizon Bill OnTrac Tracking Supplier Information Amazon Invoice SSN Driver's License Proof of Shipping
11	1/22/17 – 1/25/17	3125	M.K.	Driver's License Verizon Statement Bankcorp Bank Statement Bank of America Statement Amazon Invoice Proof of Shipping Information Business Information

12	2/15/17 – 3/18/17	2551	P.F.	Driver’s License Social Security Card Verizon Statement Supplier Information UPS Tracking Information
13	3/18/17	4929	N.B.	Driver’s License Verizon Statements FedEx Tracking Information UPS Tracking Information Supplier Information Business Information
14	3/18/17 – 3/20/17	2623	C.M.	Driver’s License Social Security Card Verizon Statement Supplier Contact
15	4/5/17	9393	I.M.	Passport AT&T Statement
16	4/15/17	1223	M.L.	Passport
17	5/30/17 6/2/17	5011	Q.F.	Social Security Card Passport Proof of Shipping Business Information
18	5/31/17	8658	K.J.	Passport AT&T Bill Shipping Labels Galls Invoice

HO Transferred Money From PayPal to His Personal Bank Accounts:

Count	Transfer Date (on or about)	Wire
19	8/11/15	HO transferred \$4,439.75 from the D.S. PayPal account to HO’s personal bank account at Old National Bank in Evansville, ending in 6887.
20	11/7/17	HO transferred \$2,198.00 from the J.C. PayPal account to HO’s personal bank account at BMO Harris Bank, N.A., ending in 9178.

Each Count of which is a separate violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 21
Aggravated Identity Theft
18 U.S.C. §§ 1028A(a)(1) and (c)(5)

52. On or about July 16, 2015, and July 22, 2015, within the Southern District of Indiana and elsewhere,

TUONG QUOC HO,
A/K/A “ROBERT PARKER”,
A/K/A “HOQUOCTUONG”,

the Defendant herein, during and in relation to the foregoing felony violation of Title 18, United States Code, Section 1343 (wire fraud) as alleged in Count 2 above, knowingly possessed and used, without lawful authority, a means of identification of another person, in and affecting interstate commerce, that is, the Defendant possessed false and fraudulent identification documents containing the name, address, and date of birth of Victim C.A., a resident of Muncie, Indiana, and uploaded those documents to the fraudulent PayPal account in Victim C.A.’s name so that HO could continue using the fraudulent PayPal account.

All of which is a violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5).

COUNT 22
Aggravated Identity Theft
18 U.S.C. §§ 1028A(a)(1) and (c)(5)

53. On or about April 27, 2016, within the Southern District of Indiana and elsewhere,

TUONG QUOC HO,
A/K/A “ROBERT PARKER”,
A/K/A “HOQUOCTUONG”,

the Defendant herein, during and in relation to the foregoing felony violation of Title 18, United States Code, Section 1343 (wire fraud) as alleged in Count 6 above, knowingly possessed and used, without lawful authority, a means of identification of another person, in and affecting interstate commerce, that is, the Defendant possessed false and fraudulent identification documents containing the name, address, and date of birth of Victim K.H., a resident of Mt. Zion, Illinois, and uploaded those documents to the fraudulent PayPal account in Victim K.H.’s name so that HO could continue using the fraudulent PayPal account.

All of which is a violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5).

COUNT 23
Possession of Multiple Unauthorized Access Devices
18 U.S.C. §§ 1029(a)(3) and (c)(1)(A)(i)

54. Between on or about October 24, 2018, and on or about August 23, 2019, within the Southern District of Indiana and elsewhere,

TUONG QUOC HO,
A/K/A “ROBERT PARKER”,
A/K/A “HOQUOCTUONG”,

the Defendant herein, knowingly and with intent to defraud, possessed fifteen or more unauthorized access devices, in and affecting interstate commerce, that is, the Defendant possessed files on his computers and email accounts containing hundreds of credit card account numbers of others, many of which were compromised, including the following files, among many others:

Device/ Location	File(s)/Email Subjects Containing Access Devices
Apple Macbook Pro (SN C02L67LJFFT0)	0BF81186-CEF3-4E56-8F8A-8.txt
	1C4FED28-7D8C-446E-8112-9.txt
	25FA85A6-D9CB-4F85-A61C-9.rtf
	100c.txt
	7601FCC9-63C2-4295-A716-4.txt
	9664F490-0546-4972-BE14-C.rtf
	E5000478-790B-4C8E-972F-C.txt
Apple Macbook Pro (SN CO2t2af2gtf1)	1kTUONG1.txt
	eee.txt
	24 visa.txt
	10 59.txt
	10ok.txt
	8.txt
	1kTUONG.txt

KittySell2012 Email Account	New Text Document (4).txt
	New Text Document (5).txt
	2013-10-21 anhheo p1.txt
	New Text Document (3).txt
	656871196 – 50 amex – 18-2.txt
	New Text Document (5).txt
	50visa15-1.txt
	100c.txt
	30dis2-3.txt
	50random29-3-2019.txt
	50random30-9-2018.txt
	50random21-10-2018.txt
	Change-Jun.txt
	200ccn-200dis1-1.txt
	20dis19-6.txt
	ccv 16-7.txt
	100disco12-7.txt
Email Subject: "Fwd: ffffffff"	
RobertfParker1 Email Account	Email Subject "fffffff"
	100c.txt

All of which is a violation of Title 18, United States Code, Sections 1029(a)(3) and (c)(1)(A)(i).

COUNT 24

**Unlawful Transfer, Possession, or Use of a Means of Identification
18 U.S.C. §§ 1028(a)(7), (b)(2)(A), (b)(2)(B), and (c)(3)(A)**

55. Between on or about October 24, 2018 and on or about August 23, 2019, within the Southern District of Indiana and elsewhere,

**TUONG QUOC HO,
A/K/A "ROBERT PARKER",
A/K/A "HOQUOCTUONG",**

the Defendant herein, did knowingly transfer, possess, and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person knowing that the means of identification belonged to another actual person, with the intent to commit, and

in connection with, any unlawful activity that constitutes a violation of Federal law or a felony under any applicable State or local law, that is, the Defendant possessed files on his computers, cellular telephones, and thumb drives, and within his email accounts, containing thousands of social security numbers, with the intent to commit, and in connection with, the wire fraud Scheme described herein, including the following files, among others:

Location	File Name Containing Means of Identification	
Apple Macbook Pro (SN C02L67LJFFT0)	9E792853-EC57-4302-8044-E.txt	
	A89924B6-FAE9-4520-9DE6-1.txt	
	full 1.txt	
	full 2.txt	
	Untitled.rtf	
Silver NW3C National White Collar Crime Center Thumb drive	info.txt	
	info-1.txt	
Rose gold Apple iPhone (SN 357277090317325) Rose gold Apple iPhone S model A1688 (IMEI No. 353270078690825) Black Apple iPhone with red case, Model A1784 (IMEI No. 353810081448750)	iNotes.pdf	
KittySell2012 email account		New Text Document (4).txt
		Hemoi.txt
	50vis+50mc9-3.txt	

All of which is a violation of Title 18, United States Code, Sections 1028(a)(7), (b)(2)(A), (b)(2)(B), and (c)(3)(A).

COUNTS 25 – 26
Money Laundering
18 U.S.C. § 1957

56. On or about April 20, 2018, within the Southern District of Indiana and elsewhere,

TUONG QUOC HO ,
A/K/A “ROBERT PARKER”,
A/K/A “HOQUOCTUONG”,

the Defendant herein, knowingly engaged in monetary transactions in criminally derived property of a value greater than \$10,000, derived from a specified unlawful activity, to wit: wire fraud as charged above, through or to a financial institution, affecting interstate or foreign commerce, for the purchase of his residence, that is, the Defendant did transfer and cause to be transferred, in and affecting interstate commerce, the funds drawn on a checking account maintained at a financial institution, said funds having been derived from the wire fraud Scheme described herein, as follows:

Count	Date (on or about)	Description of Transaction
25	4/20/18	Wire transfer of \$102,442.47 from HO’s Huntington National Bank Account ending in 2468 to National Title Agency of MI for the purchase of the HO’s residence in Carmel, Indiana
26	4/20/18	Wire transfer of \$233,000.00 from TUONG’s PNC Bank account ending in 1828 to National Title Agency of MI for the purchase of HO’s residence in Carmel, Indiana.

Each Count of which is a separate violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 through 20 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1343, the Defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. all items seized by the Carmel Indiana Police Department (CPD) from HO's person, vehicles, and residences on October 24, 2018;
- b. all bank accounts seized by the CPD pertaining to this investigation in about October 2018 through in or about December 2018, all PayPal accounts seized by CPD in about October 2018 through in or about December 2018, 11593 Mansfield Place, Carmel, Indiana;
- c. Asset Identification Number 20-FBI-006528:
 - (i) R.M. Williams Leather Jacket, Size Small
 - (ii) R.M. Williams Comfort Craftsman Chestnut/Yearling shoes, US Size 2
 - (iii) The Kooples Black Leather Sport Jacket, Size Small
 - (iv) Salvatore Ferragamo Navy Leather Belt, Model LG-679054
 - (v) Salvatore Ferragamo Brown Leather Belt, Model CI-679068
 - (vi) Salvatore Ferragamo MS 77146 D, Black Loafers, Size 8 ½
 - (vii) Dr. Martens Sawyer, Black, Size 9 USM
 - (viii) Dr. Martens The Original, Black, Size 9 USM
 - (ix) Dr. Martens 1672760, Black and Tan, Size 7 USM
 - (x) Dr. Martens Elmer, Elmer, Size 9 USM
 - (xi) Dr. Martens 1461, Black, Size 7
 - (xii) Salvatore Ferragamo LLC 12754, Black, Size 8 1/2
 - (xiii) Cole Haan Hamilton Grnd Pln Ox, Black, Size 8.5 M;

- d. Asset Identification Number 20-FBI-006546:
 - (i) Omega Speedmaster Men's Watch
 - (ii) Shinola Men's Watch
 - (iii) Breitling Men's Watch, NAV1 GMT 46;

- e. Asset Identification Number 20-FBI-006547:
 - (i) Herman Miller Grey Office Chair
 - (ii) Herman Miller Grey Office Chair
 - (iii) Noble House Home Furnishing LLC Fire Pit, Model 59241.00 WHI-50K
 - (iv) Charbroil Signature Infrared Grill, Model 463276016
 - (v) Lovesac Outdoor Sectional
 - (vi) 10 piece Am Autonomous Adjustable White Top Desk, Model JSET-3
 - (vii) Am Autonomous Adjustable Brown Top Desk, Model JSET-3
 - (viii) Live Edge Custom Dining Table With Tabletop, Two Legs, and Bag of Hardware;

- f. Asset Identification Number 20-FBI-006551:
 - (i) Troy-Bilt Zero Turn Lawn Mower Model 17ARCACS001; and

- g. Asset Identification Number 20-FBI-0031560:
 - (i) Two Bank of America accounts: XXXXXXXXX7849 and XXXXXXXXX7852 (\$25,755.97)

Additionally, the United States of America will seek an order of forfeiture for a sum of money equal to the total amount of the proceeds the defendants obtained as the result of the offenses set forth in the offenses of which the Defendant is convicted and the total value of the property involved in these offenses.

3. The allegations contained in Counts 23 and 24 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 1028(b)(5), and 1029(c)(1)(C).

4. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1028 and 1029, the Defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and any personal property used or intended to be used to commit the offense. The property to be forfeited includes, but is not limited to:

- a. Asset Identification Number 20-FBI-006519:
 - (i) Apple iPhone 11 Pro
 - (ii) Cyanogen Cell Phone
 - (iii) Apple iPhone X
 - (iv) Apple MacBook Pro with power adapter and video adapter
 - (v) Samsun SM-J337P Cell Phone

5. The allegations contained in Counts 25 and 26 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1).

6. Upon conviction of an offense in violation of Title 18, United States Code, Section 1957, the Defendant shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes but is not limited to: Any and all property listed in Paragraph 2 of this forfeiture allegation.

7. If any of the property described above, 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 party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



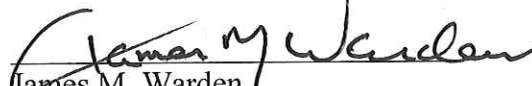
FOREPERSON

ZACHARY A. MYERS
UNITED STATES ATTORNEY

by:


MaryAnn T. Mindrum
Assistant United States Attorney

by:


James M. Warden
Assistant United States Attorney