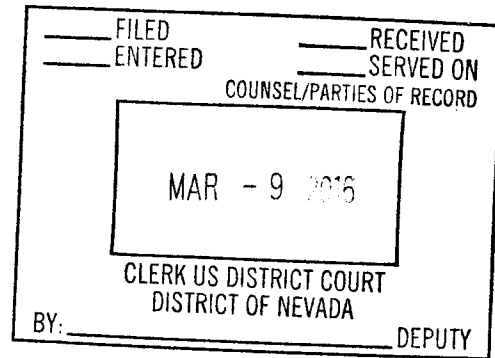


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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GARETH DAVID LONG,

Defendant.

SEALED CRIMINAL INDICTMENT

Case No.: 2:16-cr- *71*

VIOLATIONS:

18 U.S.C. § 1343

18 U.S.C. § 1028A

18 U.S.C. § 1957

At times material to this Indictment:

INTRODUCTORY ALLEGATIONS

1. Defendant GARETH DAVID LONG was a citizen of the United Kingdom residing in Cedar Hill, Texas. Defendant GARETH DAVID LONG owned and operated V Internet Corp, LLC ("V Internet"), a Nevada corporation with offices in Las Vegas, Nevada, and Cedar Hill, Texas. Defendant GARETH DAVID LONG also incorporated and controlled the Nevada corporation Pro Check, LLC.

1 2. V Internet was a third-party payment processor, which is an intermediary
2 between banks and merchants. V Internet opened bank accounts in its own name and
3 used these accounts to conduct banking activities on behalf of its merchant-clients. At
4 least as early as 2009, V Internet operated under the name Altcharge. At least as early as
5 December 2011, V Internet also operated under the name Check Process.

6 3. From December 2011 through July 2013, V Internet conducted business
7 using bank accounts at CommerceWest Bank in Irvine, California.

8 4. V Internet specialized in a payment mechanism called a remotely-created
9 check ("RCC"). An RCC was a check created not by the checking account holder but
10 rather by a third party using the account holder's name, address, and bank account
11 information. Unlike an ordinary check, an RCC was not signed by the account holder. In
12 place of the account holder's signature, an RCC contained a statement claiming that the
13 account holder had authorized the check.
14

15 5. An RCC could be deposited into the account of the payee and processed
16 through the banking system in the same manner as an ordinary check.

17 6. From April 2012 until July 2012, V Internet created and deposited RCCs
18 for a telemarketing company (Company A). In or around late July 2012, CommerceWest
19 Bank refused to allow V Internet to deposit any more RCCs on behalf of Company A due
20 to concerns that Company A was engaged in telemarketing fraud targeting the elderly.

21 7. From in or about April 2012 through in or about December 2012, V Internet
22 created and deposited RCCs for a company that purported to assist consumers with finding a
23 payday loan from an online lender (Company B). V Internet processed hundreds of
24

1 thousands of \$30 RCCs on behalf of Company B through V Internet's accounts at
2 CommerceWest Bank. In or about late December 2012, V Internet stopped processing RCCs
3 for Company B.

4 8. Because V Internet created and deposited RCCs for Company A and Company
5 B, V Internet possessed the personal and financial information of each account holder
6 charged by Company A and Company B, including names, addresses, bank account
7 numbers, and bank routing numbers necessary to create RCCs drawn on those accounts.
8

9 9. Many transactions V Internet processed for Company A and B were
10 returned. An RCC "return" refers to a transaction that was refused or reversed by the
11 account holder's bank because the check was drawn upon: (i) a bank account that was
12 nonexistent, closed, or contained insufficient funds; and/or (ii) a bank account of an
13 individual who had not agreed to purchase any product or service and did not authorize a
14 withdrawal from his or her account and alerted his or her bank in time to reverse the
15 transaction (usually within 30-60 days) thereby effectuating a return of the money to the
16 account.

17 **COUNTS 1-15**
18 **WIRE FRAUD**
19 **18 U.S.C. § 1343**

20 10. The Introductory Allegations of this Indictment are realleged and
21 incorporated by reference as though fully set forth herein.

22 11. Beginning in or about January 2013 and continuing through at least July
23 2013, in the District of Nevada and elsewhere, the defendant,

24 **GARETH DAVID LONG**

1 did knowingly, and with intent to defraud, devise and intend to devise a scheme and
2 artifice to defraud and to obtain money and property by means of materially false and
3 fraudulent pretenses, representations, and promises, knowing that the pretenses,
4 representations, and promises were false and fraudulent when made, and, for the purpose
5 of executing such scheme and artifice and attempting to do so, did knowingly transmit
6 and cause to be transmitted in interstate commerce by means of wire communications,
7 certain writings, signs, and signals.

8
9 **Object of the Scheme to Defraud**

10 12. The object of the scheme was, under the fraudulent pretext of providing
11 assistance to consumers in securing a payday loan, to defraud account holders and
12 financial institutions by debiting and attempting to debit millions of dollars from
13 hundreds of thousands of bank accounts of unwitting account holders throughout the
14 United States who did not authorize debits of their accounts.

15 **The Scheme to Defraud**

16 13. In or around late December 2012, GARETH DAVID LONG created the
17 façade that he was operating a merchant business that offered assistance to consumers in
18 finding payday loans.

19 14. In January 2013, Defendant GARETH DAVID LONG registered the
20 website www.fastloanfast.com. In February 2013, defendant GARETH DAVID LONG
21 registered the website www.loan4utoday.com. In April 2013, defendant GARETH
22 DAVID LONG registered the website www.fastloan4me.com.
23
24

1 15. Other than the different names, these three websites were largely identical.
2 The websites purported to allow consumers to apply for a payday loan and match
3 applicants with lenders.

4 16. From on or about January 8, 2013 through on or about July 12, 2013,
5 defendant GARETH DAVID LONG, through his company, V Internet, created and
6 deposited thousands of \$30 RCCs nearly every business day. These RCCs withdrew
7 money from victims' bank accounts.

8 17. But, these RCC's were not generated by visits to these websites. Rather,
9 defendant GARETH DAVID LONG charged the accounts of hundreds of thousands of
10 individuals who had never visited these websites or authorized a charge by defendant
11 GARETH DAVID LONG's company.
12

13 **How LONG Obtained Victims' Account Information**

14 18. Defendant GARETH DAVID LONG learned of many of these account
15 holders from "lead lists." From January 2013 through July 2013, using the company
16 name Pro Check LLC, defendant GARETH DAVID LONG purchased lead lists, which
17 were electronic files that each contained detailed personal and financial information of
18 thousands of bank account holders. Defendant GARETH DAVID LONG paid
19 approximately \$0.25 to \$0.35 per account holder for these lead lists.
20

21 19. Defendant GARETH DAVID LONG created and deposited hundreds of
22 thousands of \$30 RCCs using the personal and financial information contained on these
23 lead lists.
24

1 20. In addition to the RCCs created from the lead lists, defendant GARETH
2 DAVID LONG created and deposited hundreds of thousands of \$30 RCCs drawn on the
3 bank accounts of account holders who had previously been charged by V Internet's prior
4 merchants, Company A and Company B.

5 **Additional, Repeat Charges Against Victims' Accounts**

6 21. Defendant GARETH DAVID LONG created and deposited multiple,
7 additional \$30 RCCs drawn on the accounts of hundreds of thousands of his unwitting
8 victims, whether he knew the account holders' information by way of lead lists or by way
9 of Companies A and B. For tens of thousands of these account holders, defendant
10 GARETH DAVID LONG created and deposited four or more RCCs drawn on each
11 account.

12 22. V Internet's RCCs contained false statements that allowed the RCCs to be
13 processed through the banking system. Despite the fact that hundreds of thousands of
14 account holders had not authorized a payment to defendant GARETH DAVID LONG's
15 company, V Internet's RCCs contained the following statement, "NO SIGNATURE
16 REQUIRED. This payment has been authorized by your depositor," followed by the
17 account holder's typed name. Account holders' banks relied on this statement to accept
18 the RCCs as valid withdrawals from their customers' accounts.

19 23. V Internet's RCCs were made payable to one of four entities or websites
20 associated with defendant GARETH DAVID LONG. Numerous RCCs were made
21 payable to defendant GARETH DAVID LONG's payment processing entity, Check
22
23
24

1 Process. Numerous RCCs were made payable to the name of one of defendant GARETH
2 DAVID LONG's three websites: FastLoanFast, Loan4uToday, and FastLoan4me.

3 24. From January through July 2013, defendant GARETH DAVID LONG
4 created and deposited more than 750,000 RCCs, totaling more than \$22 million.
5 Approximately 50% of the RCCs created and deposited by V Internet were returned by
6 account holders' banks. Many RCCs were returned because the account holder saw the
7 debit and realized that an unauthorized charge was being imposed on his or her account.
8 Other RCCs were returned because they were drawn on accounts that were nonexistent,
9 closed or did not contain sufficient funds to cover the debit. Many victims, however, did
10 not notice the charge and therefore did not dispute it.
11

12 25. Defendant GARETH DAVID LONG operated a call center in Cedar Hill,
13 Texas. Call center employees received calls from account holders who had been charged
14 one or more times. Defendant GARETH DAVID LONG provided instructions to call
15 center employees on how to respond to complaints. Among other instructions, defendant
16 GARETH DAVID LONG instructed call center employees to falsely tell account holders
17 that they must have applied for a payday loan and authorized the \$30 fee; otherwise, V
18 Internet would not have their information.

19 26. When account holders called and complained about the charges on their
20 accounts, at times V Internet employees promised to refund account holders' money.
21 Defendant GARETH DAVID LONG had authority over whether an account holder
22 would receive a refund. V Internet rarely refunded account holders' money, even after V
23 Internet employees had promised such a refund.
24

Executions of the Scheme

27. On or about the dates specified as to each Count below, the defendant,

GARETH DAVID LONG

for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, as specified in each count below:

COUNT	APPROXIMATE DATE OF WIRE	WIRE
1	January 25, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the account of V.M., transmitted from V Internet's server in Las Vegas, Nevada
2	February 4, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, transmitted from V Internet's server in Las Vegas, Nevada
3	February 5, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, transmitted from V Internet's server in Las Vegas, Nevada
4	February 6, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, transmitted from V Internet's server in Las Vegas, Nevada
5	February 7, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, transmitted from V Internet's server in Las Vegas, Nevada
6	February 8, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, transmitted from V Internet's server in Las Vegas, Nevada
7	February 12, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the account of J.M., transmitted from V Internet's server in Las Vegas, Nevada
8	February 15, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the

		account of C.K., transmitted from V Internet's server in Las Vegas, Nevada
9	March 5, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the account of F.N., transmitted from V Internet's server in Las Vegas, Nevada
10	March 12, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the account of T.W., transmitted from V Internet's server in Las Vegas, Nevada
11	March 18, 2013	File containing thousands of \$30 RCCs, including \$30 RCCs drawn on the accounts of M.V., M.D., M.W., and C.P., transmitted from V Internet's server in Las Vegas, Nevada
12	March 19, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the account of M.D., transmitted from V Internet's server in Las Vegas, Nevada
13	March 20, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including \$30 RCCs drawn on the accounts of L.M. and H.H., transmitted from V Internet's server in Las Vegas, Nevada
14	March 21, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the account of L.G., transmitted from V Internet's server in Las Vegas, Nevada
15	March 29, 2013	Interstate transfer of a file containing thousands of \$30 RCCs, including a \$30 RCC drawn on the account of J.M., transmitted from V Internet's server in Las Vegas, Nevada

All in violation of 18 U.S.C. § 1343.

COUNTS 16-29
AGGRAVATED IDENTITY THEFT
18 U.S.C. § 1028A(a)(1)

28. Paragraphs 1-27 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

29. On or about the following dates, in the District of Nevada, and elsewhere,
the defendant,

GARETH DAVID LONG

did knowingly transfer, possess, and use, without lawful authority, a means of
identification of another person; namely, the bank account number, routing number,
name, and address of the individuals identified below, during and in relation to a felony
violation of a provision contained in chapter 63, United States Code, that is, wire fraud,
in violation of Title 18, United States Code, Section 1343, charged in Counts One
through 15 of this Indictment:

COUNT	APPROXIMATE DATE OF WIRE FRAUD OFFENSE	ACCOUNT INFORMATION
16	January 25, 2013	RCC containing the name and address of V.M., account number and bank routing number for V.M.'s account at New Generation Federal Credit Union
17	February 12, 2013	RCC containing the name and address of J.M., account number and bank routing number for J.M.'s account at Chase Bank
18	February 15, 2013	RCC containing name and address of C.K., account number and bank routing number for C.K.'s account at Chase Bank
19	March 5, 2013	RCC containing name and address of F.N., account number and bank routing number for F.N.'s account at First U.S. Community Credit Union
20	March 12, 2013	RCC containing name and address of T.W., account number and bank routing number for T.W.'s account at USAA
21	March 18, 2013	RCC containing name and address of M.V., account number and bank routing number for M.V.'s account at TD Bank
22	March 18, 2013	RCC containing name and address of M.D., account number and bank routing number for M.D.'s account at Sovereign Bank

23	March 18, 2013	RCC containing name and address of M.W., account number and bank routing number for M.W.'s account at Woodforest National Bank
24	March 18, 2013	RCC containing name and address of C.P., account number and bank routing number for C.P.'s account at Palm Beach County Credit Union
25	March 19, 2013	RCC containing name and address of M.D., account number and bank routing number for M.D.'s account at USAA
26	March 20, 2013	RCC containing name and address of L.M., account number and bank routing number for L.M.'s account at Roma Savings and Loan
27	March 20, 2013	RCC containing name and address of H.H., account number and bank routing number for H.H.'s account at Liberty Bank
28	March 21, 2013	RCC containing name and address of L.G., account number and bank routing number for L.G.'s account at One Nevada Credit Union
29	March 29, 2013	RCC containing the name and address of J.M., account number and bank routing number for J.M.'s account at Chase Bank

All in violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

COUNTS 30-39
MONEY LAUNDERING
18 U.S.C. § 1957(a)

30. Paragraphs 1-29 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

31. On or about the following dates, in the District of Nevada, and elsewhere, the defendant,

GARETH DAVID LONG

knowingly engaged in the below-listed monetary transactions, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that

is, transfers of funds in the amounts listed below, on the dates set forth below, with such funds having been derived from a specified unlawful activity, that is, the wire fraud scheme charged in Counts 1 through 15.

COUNT	APPROXIMATE DATE	MONETARY TRANSACTION
30	April 19, 2013	\$175,000 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to R.T.'s bank account at Compass Bank
31	April 19, 2013	\$40,000 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to R.T.'s bank account at Compass Bank
32	May 9, 2013	\$250,000 wire transfer from V Internet's CommerceWest Bank account ending in *7698 to K.F.'s bank account at Bank of Desoto
33	May 10, 2013	\$12,919.49 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to L.S.A.'s bank account at Wells Fargo
34	May 10, 2013	\$12,510 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to L.S.A.'s bank account at Wells Fargo
35	May 16, 2013	\$200,000 wire transfer from V Internet's CommerceWest Bank account ending *7649 to W.W.'s bank account at Bank of America
36	May 17, 2013	\$17,825 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to L.S.A.'s bank account at Wells Fargo
37	May 17, 2013	\$46,000 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to H.D.'s bank account at PlainsCapital Bank
38	June 28, 2013	\$11,648.20 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to L.S.A.'s bank account at Wells Fargo
39	July 1, 2013	\$15,901 wire transfer from V Internet's CommerceWest Bank account ending in *7649 to L.S.A.'s bank account at Wells Fargo

All in violation of 18 U.S.C. §§ 1957(a) and 2.

FORFEITURE ALLEGATION ONE

(Wire Fraud)

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

2. Upon conviction of any of the felony offenses charged in Counts One through Fifteen of this Indictment,

GARETH DAVID LONG

defendant herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, an in personam criminal forfeiture money judgment including, but not limited to, at least \$11,300,000 in United States Currency, including:

- a. \$210.32 in United States Currency;
- b. \$938.01 in United States Currency;
- c. \$60 in United States Currency;
- d. \$1,081.33 in United States Currency;
- e. \$10,225.46 in United States Currency;
- f. \$788,593.43 in United States Currency;
- g. \$2,112,673.65 in United States Currency;
- h. REAL PROPERTY LOCATED AT 1350 STONEY CREEK DRIVE, CEDAR HILL, DALLAS COUNTY, TEXAS 75104; and

1 MORE PARTICULARLY DESCRIBED AS ALL THAT REAL PROPERTY
2 SITUATED IN THE COUNTY OF DALLAS, STATE OF TEXAS: BEING A
3 10.00 ACRE TRACT OF LAND SITUATED IN THE U. MATTHUSEN 106.50
4 ACRE SURVEY, ABSTRACT NO. 1046, THE WILLIAM NEWBY 198 ACRE
5 SURVEY,

6 ABSTRACT NO. 1085, THE WILLIAM C. BILLINGSLEY 60 ACRE SURVEY,
7 ABSTRACT NO. 136, AND THE WILLIAM MASTERS 160 ACRE SURVEY,
8 ABSTRACT NO. 899, DALLAS COUNTY, TEXAS, BEING ALL THAT
9 CERTAIN TRACT OF LAND DESCRIBED IN DEED AS TRACT ONE TO
10 KELLI FREEMAN, AS RECORDED IN INSTRUMENT NO. 200503550084,
11 DEED RECORDS OF DALLAS, COUNTY, TEXAS, AND BEING MORE
12 PARTICULARLY DESCRIBED BY METES AND BOUNDS AS FOLLOWS
13 BEGINNING AT A FOUND 1/2-INCH IRON ROD AT THE COMMON
14 NORTH CORNER OF SAID TRACT ONE AND THAT CERTAIN TRACT OF
15 LAND DESCRIBED IN DEED TO DAVID WILLIS AND BARBARA WILLIS,
16 AS RECORDED IN VOLUME 96021, PAGE 2189, SAID DEED RECORDS,
17 SAID IRON ROD BEING ON THE SOUTH LINE OF STONEY CREEK
18 ESTATES, AN ADDITION TO DALLAS COUNTY, TEXAS, ACCORDING
19 TO THE PLAT THEREOF RECORDED IN VOLUME 83241, PAGE 3281,
20 MAP RECORDS, DALLAS COUNTY, TEXAS; THENCE SOUTH 05
21 DEGREES 16 MINUTES 35 SECONDS WEST, A DISTANCE OF 104.25 FEET
22 ALONG THE COMMON LINE OF SAID TRACT ONE AND SAID WILLIS
23 TRACT TO A FOUND 1/2-INCH IRON ROD; THENCE SOUTH 22 DEGREES
24 59 MINUTES 58 SECONDS EAST, A DISTANCE OF 376.97 FEET ALONG
SAID COMMON LINE TO A POINT FROM WHICH A FOUND 1/2-INCH
IRON ROD BEARS SOUTH 68 DEGREES 43 MINUTES 21 SECONDS WEST;
A DISTANCE OF 0.37 OF ONE FOOT; THENCE SOUTH 00 DEGREES 33
MINUTES 45 SECONDS WEST, A DISTANCE OF 1,073.27 FEET ALONG
SAID COMMON LINE TO A FOUND 1/2-INCH IRON ROD AT THE
COMMON, EAST CORNER OF AFORESAID TRACT ONE AND THAT
CERTAIN TRACT OF LAND DESCRIBED IN AFORESAID FREEMAN
DEED AS TRACT TWO; THENCE NORTH 52 DEGREES 04 MINUTES 37
SECONDS WEST, A DISTANCE OF 935.05 FEET ALONG THE COMMON
LINE OF SAID TRACTS ONE AND TWO TO A FOUND 1/2-INCH IRON
ROD AT THE COMMON WEST CORNER OF SAID TRACTS, SAID IRON
ROD BEING ON THE SOUTHEAST LINE OF THAT CERTAIN TRACT OF
LAND DESCRIBED IN DEED AS TRACT I TO DAVID HOELSCHER AND
WIFE, SUZANNE HOELSCHER, AS RECORDED IN INSTRUMENT NO.
201000321376, AFORESAID DEED RECORDS; THENCE NORTH 45
DEGREES 33 MINUTES 45 SECONDS EAST, A DISTANCE OF 472.27 FEET
ALONG THE COMMON LINE OF SAID TRACTS ONE AND 1 TO A POINT
FROM WHICH A FOUND 1/2-INCH IRON ROD BEARS NORTH 69
DEGREES 41 MINUTES 21 SECONDS WEST, A DISTANCE OF 0.52 OF

ONE FOOT; THENCE SOUTH 89 DEGREES 29 MINUTES 56 SECONDS EAST, A DISTANCE OF 359.26 FEET ALONG SAID COMMON LINE TO A FOUND 1/2-INCH IRON ROD; THENCE NORTH 00 DEGREES 33 MINUTES 45 SECONDS EAST, A DISTANCE OF 161.09 FEET ALONG SAID COMMON LINE TO A FOUND 1/2-INCH IRON ROD; THENCE NORTH 22 DEGREES 59 MINUTES 58 SECONDS WEST, A DISTANCE OF 379.14 FEET ALONG SAID COMMON LINE TO A FOUND 1/2-INCH IRON ROD; THENCE NORTH 05 DEGREES 16 MINUTES 35 SECONDS EAST, A DISTANCE OF 95.75 FEET ALONG SAID COMMON LINE TO A FOUND 1/2-INCH IRON ROD AT THE COMMON NORTH CORNER OF AFORESAID TRACTS ONE AND 1, SAID IRON ROD BEING ON THE AFORESAID SOUTH LINE OF STONEY CREEK ESTATES; THENCE NORTH 72 DEGREES 24 MINUTES 01 SECONDS EAST, A DISTANCE OF 54.27 FEET ALONG THE COMMON LINE OF SAID TRACT ONE AND SAID STONEY CREEK ESTATES TO THE POINT OF BEGINNING AND CONTAINING 435,593 SQUARE FEET OR 10.00 ACRES OF LAND TOGETHER WITH ANY AND ALL IMPROVEMENTS AND

APPURTENANCES THEREON, ASSESSOR'S PARCEL NUMBER 65013606010010400.

i. REAL PROPERTY LOCATED AT 1204 SOUTH CLARK ROAD, CEDAR HILL, DALLAS COUNTY, TEXAS 75104;

MORE PARTICULARLY DESCRIBED AS ALL THAT REAL PROPERTY SITUATED IN THE COUNTY OF DALLAS, STATE OF TEXAS: BEING A 13.27 ACRE TRACT OF LAND SITUATED IN THE WILLIAM C. BILLINGSLEY 160 ACRE SURVEY, ABSTRACT NO. 136, AND THE WILLIAM MASTERS 160 ACRE SURVEY, ABSTRACT NO. 899, DALLAS COUNTY, TEXAS, BEING ALL THAT CERTAIN TRACT OF LAND DESCRIBED IN DEED AS TRACT TWO TO KELLI FREEMAN, AS RECORDED IN INSTRUMENT NO. 200503550084, DEED RECORDS OF DALLAS COUNTY, TEXAS, AND BEING MORE PARTICULARLY DESCRIBED BY METES AND BOUNDS AS FOLLOWS: BEGINNING AT A FOUND 1/2-INCH IRON ROD AT THE COMMON EAST CORNER OF SAID TRACT TWO AND THAT CERTAIN TRACT OF LAND DESCRIBED AS TRACT ONE IN SAID FREEMAN DEED, SAID IRON ROD BEING ON THE WEST LINE OF THAT CERTAIN TRACT OF LAND DESCRIBED IN DEED TO DAVID WILLIS AND BARBARA WILLIS, AS RECORDED IN VOLUME 96021, PAGE 2189, SAID DEED RECORDS; THENCE SOUTH 00 DEGREES 33 MINUTES 45 SECONDS WEST, A DISTANCE OF 400.00 FEET ALONG THE COMMON LINE OF SAID TRACT TWO AND SAID WILLIS TRACT TO A FOUND 1/2-INCH IRON ROD; THENCE SOUTH 45 DEGREES 33 MINUTES 45 SECONDS WEST, PASSING A FOUND 1/2-INCH IRON ROD

1 AT A DISTANCE OF 629.94 FEET AND CONTINUING A TOTAL
2 DISTANCE OF 731.92 FEET ALONG SAID COMMON LINE TO THE
3 COMMON SOUTH CORNER OF SAID TRACT TWO AND THAT CERTAIN
4 TRACT OF LAND DESCRIBED IN DEED TO TERRY M. CAMPA, SR., AS
5 RECORDED IN INSTRUMENT NO. 200503584402, AFORESAID DEED
6 RECORDS; THENCE NORTH 67 DEGREES 19 MINUTES 24 SECONDS
7 WEST, A DISTANCE OF 50.48 FEET ALONG THE COMMON LINE OF
8 SAID TRACT TWO AND SAID CAMPA TRACT; THENCE NORTH 41
9 DEGREES 07 MINUTES 33 SECONDS EAST, A DISTANCE OF 49.34 FEET
10 ALONG SAID COMMON LINE; THENCE NORTH 04 DEGREES 40
11 MINUTES 26 SECONDS EAST, A DISTANCE OF 77.45 FEET ALONG SAID
12 COMMON LINE; THENCE SOUTH 76 DEGREES 30 MINUTES 09 SECONDS
13 EAST, A DISTANCE OF 96.76 FEET ALONG SAID COMMON LINE;
14 THENCE NORTH 25 DEGREES 33 MINUTES 58 SECONDS EAST, A
15 DISTANCE OF 87.97 FEET ALONG SAID COMMON LINE; THENCE
16 NORTH 48 DEGREES 12 MINUTES 32 SECONDS EAST, A DISTANCE OF
17 217.53 FEET ALONG SAID COMMON LINE; THENCE NORTH 07
18 DEGREES 31 MINUTES 18 SECONDS EAST, A DISTANCE OF 71.74 FEET
19 ALONG SAID COMMON LINE; THENCE NORTH 45 DEGREES 17
20 MINUTES 42 SECONDS WEST, A DISTANCE OF 47.91 FEET ALONG SAID
21 COMMON LINE TO A POINT FROM WHICH A FOUND 1/2-INCH IRON
22 ROD BEARS NORTH 58 DEGREES 41 MINUTES 01 SECONDS EAST, A
23 DISTANCE OF 0.54 OF ONE FOOT; THENCE NORTH 33 DEGREES 16
24 MINUTES 05 SECONDS WEST, A DISTANCE OF 313.56 FEET ALONG
SAID COMMON LINE TO A POINT FROM WHICH A FENCE CORNER
BEARS SOUTH 28 DEGREES 20 MINUTES EAST - 0.8 OF ONE FOOT;
THENCE NORTH 72 DEGREES 09 MINUTES 03 SECONDS WEST, A
DISTANCE OF 142.93 FEET ALONG SAID COMMON LINE TO A POINT
FROM WHICH A FOUND RAILROAD SPIKE BEARS NORTH 57 DEGREES
04 MINUTES 03

SECONDS EAST, A DISTANCE OF 0.52 OF ONE FOOT; THENCE NORTH
59 DEGREES 08 MINUTES 16 SECONDS WEST, A DISTANCE OF 131.42
FEET ALONG SAID COMMON LINE TO A POINT FROM WHICH A
FOUND 1/2-INCH IRON ROD BEARS NORTH 84 DEGREES 58 MINUTES 20
SECONDS EAST, A DISTANCE OF 0.44 OF ONE FOOT; THENCE NORTH
34 DEGREES 44 MINUTES 43 SECONDS WEST, A DISTANCE OF 66.00
FEET ALONG SAID COMMON LINE TO A POINT FROM WHICH A
FOUND 1/2-INCH IRON ROD BEARS NORTH 71 DEGREES 10 MINUTES 32
SECONDS EAST, A DISTANCE OF 0.51 OF ONE FOOT, SAID POINT
BEING THE COMMON CORNER OF AFORESAID TRACT TWO,
AFORESAID CAMPA TRACT, AND THAT CERTAIN TRACT OF LAND
DESCRIBED IN DEED TO TERRY M. CAMPA, SR. AND WIFE, LAURA L.
CAMPA, AS RECORDED IN INSTRUMENT NO. 200503602018,

1 AFORESAID DEED RECORDS; THENCE NORTH 54 DEGREES 00
 2 MINUTES 46 SECONDS WEST, A DISTANCE OF 458.48 FEET ALONG THE
 3 COMMON LINE OF SAID TRACT TWO AND SAID CAMPA TRACT
 4 (200503602018) TO A POINT FROM WHICH A FOUND 1/2-INCH IRON ROD
 5 BEARS NORTH 52 DEGREES 18 MINUTES 08 SECONDS EAST, A
 6 DISTANCE OF 0.31 OF ONE FOOT, SAID POINT BEING THE COMMON
 7 CORNER OF SAID TRACT TWO, SAID CAMPA TRACT (200503602018),
 8 AND THAT CERTAIN TRACT OF LAND DESCRIBED IN DEED AS TRACT
 9 1 TO DAVID HOELSCHER AND WIFE, SUZANNE HOELSCHER, AS
 10 RECORDED IN INSTRUMENT NO. 201000321376, SAID DEED RECORDS;
 11 THENCE NORTH 45 DEGREES 33 MINUTES 45 SECONDS EAST, A
 12 DISTANCE OF 499.46 FEET ALONG THE COMMON LINE OF SAID TRACT
 TWO AND SAID TRACT 1 TO A FOUND 1/2-INCH IRON ROD AT THE
 COMMON WEST CORNER OF SAID TRACT TWO AND AFORESAID
 TRACT ONE; THENCE SOUTH 52 DEGREES 04 MINUTES 37 SECONDS
 EAST, A DISTANCE OF 935.05 FEET ALONG THE COMMON LINE OF
 SAID TRACTS ONE AND TWO TO THE POINT OF BEGINNING AND
 CONTAINING 578,128 SQUARE FEET OR 13.27 ACRES OF LAND;
 TOGETHER WITH ANY AND ALL IMPROVEMENTS AND
 APPURTENANCES THEREON, ASSESSOR'S PARCEL NUMBER
 65013606010010000

(all of which constitutes property).

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c), 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;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendant for the property listed above and the in personam criminal forfeiture money judgment including, but not limited to, at least \$11,300,000.

1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28,
 2 United States Code, Section 2461(c); Title 18, United States Code, Section 1343; and
 3 Title 21, United States Code, Section 853(p).

4
 5 **FORFEITURE ALLEGATION TWO**
 6 (Aggravated Identity Theft)

7 1. The allegations contained in Counts Sixteen through Twenty-Nine of this
 8 Indictment are hereby realleged and incorporated herein by reference for the purpose of
 9 alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with
 10 Title 28, United States Code, Section 2461(c).

11 2. Upon conviction of any of the felony offenses charged in Counts Sixteen
 12 through Twenty-Nine of this Indictment,

13 **GARETH DAVID LONG**

14 defendant herein, shall forfeit to the United States of America, any property, real or
 15 personal, which constitutes or is derived from proceeds traceable to violations of Title 18,
 16 United States Code, Sections 1028A(a)(1), (c)(5), and 1343, a specified unlawful activity
 17 as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or a
 18 conspiracy to commit such offense, an in personam criminal forfeiture money judgment
 19 including, but not limited to, at least \$11,300,000 in United States Currency, including:

- 20 a. \$210.32 in United States Currency;
- 21 b. \$938.01 in United States Currency;
- 22 c. \$60 in United States Currency;
- 23 d. \$1,081.33 in United States Currency;
- 24 e. \$10,225.46 in United States Currency;
- f. \$788,593.43 in United States Currency;

- g. \$2,112,673.65 in United States Currency;
- h. REAL PROPERTY LOCATED AT 1350 STONEY CREEK DRIVE, CEDAR HILL, DALLAS COUNTY, TEXAS 75104, MORE PARTICULARLY DESCRIBED IN FORFEITURE ALLEGATION ONE; and
- i. REAL PROPERTY LOCATED AT 1204 SOUTH CLARK ROAD, CEDAR HILL, DALLAS COUNTY, TEXAS 75104, MORE PARTICULARLY DESCRIBED IN FORFEITURE ALLEGATION ONE

(all of which constitutes property).

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c), 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;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendant for the property listed above and the in personam criminal forfeiture money judgment including, but not limited to, at least \$11,300,000.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c); Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 1343; and Title 21, United States Code, Section 853(p).

FORFEITURE ALLEGATION THREE

(Money Laundering)

1. The allegations contained in Counts Thirty through Thirty-Nine of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(A) with Title 28, United States Code, Section 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts Thirty through Thirty-Nine of this Indictment,

GARETH DAVID LONG

defendant herein, shall forfeit to the United States of America, any property, real or personal, involved in transactions or attempted transactions in violation of Title 18, United States Code, Section 1957(a), or any property traceable to such property, an in personam criminal forfeiture money judgment including, but not limited to, at least \$11,300,000 in United States Currency, including:

- a. \$210.32 in United States Currency;
- b. \$938.01 in United States Currency;
- c. \$60 in United States Currency;
- d. \$1,081.33 in United States Currency;
- e. \$10,225.46 in United States Currency;
- f. \$788,593.43 in United States Currency;
- g. \$2,112,673.65 in United States Currency;
- h. REAL PROPERTY LOCATED AT 1350 STONEY CREEK DRIVE, CEDAR HILL, DALLAS COUNTY, TEXAS 75104, MORE PARTICULARLY DESCRIBED IN FORFEITURE ALLEGATION ONE; and

- 1 i. REAL PROPERTY LOCATED AT 1204 SOUTH CLARK ROAD,
2 CEDAR HILL, DALLAS COUNTY, TEXAS 75104, MORE
3 PARTICULARLY DESCRIBED IN FORFEITURE ALLEGATION ONE

4 (all of which constitutes property).

5 3. If any property being subject to forfeiture pursuant to Title 18, United
6 States Code, Section 981(a)(1)(A) with Title 28, United States Code, Section 2461(c), as
7 a result of any act or omission of the defendant -

- 8 a. cannot be located upon the exercise of due diligence;
9 b. has been transferred or sold to, or deposited with, a third party;
10 c. has been placed beyond the jurisdiction of the court;
11 d. has been substantially diminished in value; or
12 e. has been commingled with other property which cannot be divided without
difficulty;

13 it is the intent of the United States of America, pursuant to Title 21, United States Code,
14 Section 853(p), to seek forfeiture of any properties of the defendant for the property listed
15 above and the in personam criminal forfeiture money judgment including, but not limited
16 to, at least \$11,300,000.

17 All pursuant to Title 18, United States Code, Section 981(a)(1)(A) with Title 28,
18 United States Code, Section 2461(c); Title 18, United States Code, Section 1957(a); and
19 Title 21, United States Code, Section 853(p).

20 **FORFEITURE ALLEGATION FOUR**
21 (Money Laundering)

22 1. The allegations contained in Counts Thirty through Thirty-Nine of this
23 Indictment are hereby realleged and incorporated herein by reference for the purpose of
24 alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with
Title 28, United States Code, Section 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts Thirty through Thirty-Nine of this Indictment,

GARETH DAVID LONG

defendant herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1957(a), a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, an in personam criminal forfeiture money judgment including, but not limited to, at least \$11,300,000 in United States Currency, including:

- a. \$210.32 in United States Currency;
- b. \$938.01 in United States Currency;
- c. \$60 in United States Currency;
- d. \$1,081.33 in United States Currency;
- e. \$10,225.46 in United States Currency;
- f. \$788,593.43 in United States Currency;
- g. \$2,112,673.65 in United States Currency;
- h. REAL PROPERTY LOCATED AT 1350 STONEY CREEK DRIVE, CEDAR HILL, DALLAS COUNTY, TEXAS 75104, MORE PARTICULARLY DESCRIBED IN FORFEITURE ALLEGATION ONE; and
- i. REAL PROPERTY LOCATED AT 1204 SOUTH CLARK ROAD, CEDAR HILL, DALLAS COUNTY, TEXAS 75104, MORE PARTICULARLY DESCRIBED IN FORFEITURE ALLEGATION ONE

(all of which constitutes property).

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c), 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;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendant for the property listed above and the in personam criminal forfeiture money judgment including, but not limited to, at least \$11,300,000.

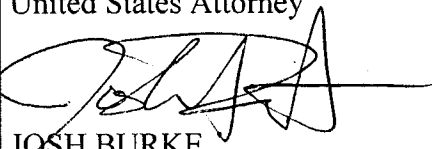
All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 1957(a); and Title 21, United States Code, Section 853(p).

DATED: this 9th day of March 2016.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney



JOSH BURKE
Trial Attorney
Consumer Protection Branch

CRANE M. POMERANTZ
Assistant United States Attorney