

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. \_\_\_\_\_

v.

THU PHAN DINH,  
TRAN KHANH,  
NGUYEN DUY TOAN,

all of whom are doing business as  
“www.zerostore.site” and other domains  
identified in Attachment A,

Defendants.

\_\_\_\_\_/

**UNITED STATES OF AMERICA’S COMPLAINT FOR  
TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY AND PERMANENT INJUNCTIONS**

Plaintiff, the United States of America (“United States”), through its undersigned counsel, hereby sues Defendants THU PHAN DINH, TRAN KHANH, and NGUYEN DUY TOAN, all of whom are doing business as “[www.zerostore.site](http://www.zerostore.site)” and other domains (“Defendants”) and alleges as follows:

**INTRODUCTION**

1. Defendants are engaging in a wire fraud scheme that defrauds consumers in the United States and exploits the current COVID-19 pandemic.

2. Defendants are using hundreds of websites, multiple PayPal accounts, and various email addresses to effectuate the scheme. The fraudulent websites operated by Defendants are listed in Attachment A.

3. Defendants create and operate websites that appear to be online retail stores offering products for sale, including health and safety products that are in high demand during the COVID-19 pandemic, such as hand sanitizer, disinfecting wipes, and hand soap.

4. To accept funds from the fraudulent website sales, Defendants create multiple email addresses tied to various names, then use these email addresses to open multiple PayPal accounts. Consumers who place orders for products on the websites submit payment via PayPal, and Defendants receive the payments for the orders. Defendants do not, however, send any of the purchased products.

5. In response to consumer complaints, Defendants provide consumers and PayPal false UPS and/or USPS tracking numbers purporting to show that products were actually delivered.

6. Defendants also falsify the contact information on their websites, including “customer service” phone numbers belonging to unaffiliated individuals and companies, causing these entities to receive disruptive complaint calls about the fraudulent websites.

7. After reaching a high volume of customer complaints and/or the attention of the web hosting company and/or law enforcement, Defendants will

close certain websites and move their online “stores” to other web domains they own to continue to profit from the scheme.

8. Defendants also rotate the PayPal accounts they use in order to avoid drawing PayPal’s attention by having high volumes of disputed charges and consumer complaints linked to a specific account.

9. Since at least December 2019, Defendants have opened multiple websites purporting to sell a variety of products, including toys, cosmetics, beauty supplies, and cooking tools. Defendants modified some of their websites in early 2020 to purportedly offer health and safety items that were scarce as a result of the COVID-19 pandemic, including hand sanitizer and disinfecting wipes.

10. The claims made on the Defendants’ websites are false, and are designed to induce victims to pay Defendants for non-existent products, and/or to obtain personal information from victims for purposes of engaging in fraudulent purchases and/or identity theft.

11. The United States of America (“the United States”) seeks to prevent continuing and substantial injury to the victims of this fraudulent scheme by bringing this action for a temporary restraining order, preliminary and permanent injunctions, and other equitable relief, pursuant to 18 U.S.C. § 1345 in order to enjoin the ongoing commission of wire fraud in violation of 18 U.S.C. § 1343 and conspiracy to commit wire fraud under 18 U.S.C. § 1349.

**JURISDICTION AND VENUE**

12. The Court has subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

13. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(3).

**PARTIES**

14. Plaintiff is the United States of America.

15. Defendants reside outside of the United States. Defendants have taken steps to conceal their identities and physical addresses.

16. In furtherance of their fraudulent scheme, Defendants have had extensive contacts with the United States. Defendants have created and maintained websites containing numerous false and misleading statements directed at potential victims throughout the United States. Defendants provide false business addresses on their websites, claiming to be located in the Middle District of Florida, and other locations in the United States. Defendants also provide false “customer service” phone numbers that actually belong to people and companies in the United States. Defendants’ victims are throughout the United States, including within the Middle District of Florida.

17. Defendant Thu Phan DINH has created PayPal accounts and received payments in connection with the fraudulent websites. DINH has also registered website domains used to carry out the scheme. DINH resides outside of the United States. Acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set

forth in this Complaint doing business as “www.zerostore.site” and other domains as listed in Attachment A. DINH is subject to personal jurisdiction in this Court pursuant to Fed. R. Civ. P. Rule 4(k)(2) based on his aggregate contacts with the United States.

18. Defendant Tran KHANH has created PayPal accounts and received payments in connection with the fraudulent websites. KHANH has also registered website domains used to carry out the scheme. KHANH resides outside of the United States. Acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint doing business as “www.zerostore.site” and other domains as listed in Attachment A. KHANH is subject to personal jurisdiction in this Court pursuant to Fed. R. Civ. P. Rule 4(k)(2) based on his aggregate contacts with the United States.

19. Defendant Nguyen Duy TOAN has created PayPal accounts and received payments in connection with the fraudulent websites. TOAN has also registered website domains used to carry out the scheme. TOAN resides outside of the United States. Acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint doing business as “www.zerostore.site” and other domains as listed in Attachment A. TOAN is subject to personal jurisdiction in this Court pursuant to Fed. R. Civ. P. Rule 4(k)(2) based on his aggregate contacts with the United States.

**DEFENDANTS' ONGOING FRAUDULENT SCHEME**

20. The COVID-19 pandemic has caused unusually high demand for certain health-related items and cleaning supplies, such as hand sanitizer and disinfectant wipes, that are useful to help prevent the spread of the virus. This unusually high demand has caused shortages which have made these products difficult to find, both on the shelves of brick and mortar stores and on e-commerce websites.

21. Defendants' wire fraud scheme has targeted American consumers who are searching for health and safety items that have become scarce due to the COVID-19 pandemic.

22. In furtherance of their scheme, Defendants created websites fraudulently purporting to be online e-commerce stores. In December 2019, Defendants' websites were purporting to sell various consumer goods, including toys and gym equipment. Beginning around March 2020, when the COVID-19 pandemic began to intensify in the United States, Defendants modified many of their websites to purport to sell health and safety items that had become scarce in the U.S. market.

23. Each of Defendants' websites directs consumers to pay for the items they wish to purchase through PayPal. PayPal directs the consumer to pay the listed purchase price of the item(s) to the PayPal account that Defendants have associated with the website.

24. Once consumers make their payment, however, Defendants keep the consumers' money, but never send the products.

25. When victims file complaints with PayPal, Defendants provide fraudulent UPS tracking numbers to demonstrate that they supposedly shipped the victims' purchased items. In some instances, these UPS tracking numbers have caused PayPal to refuse to refund victims' money.

26. To carry out their scheme, the Defendants have registered hundreds of website domains with the registrar GoDaddy.com ("GoDaddy"). The Defendants re-use much of the structure and content of the websites, allowing them to open numerous websites with little additional time and effort. Defendants shut down some websites when they receive a high volume of complaints, shift their scheme to other website domains, then re-open the websites after some time has passed.

27. Defendants have also opened hundreds of PayPal accounts to accept payments from their fraudulent websites. To create the PayPal accounts, Defendants have opened hundreds of email accounts that they use to create an identity to register with the associated PayPal account. Many of these identities are either fake or stolen from real people.

28. Defendants have falsified their contact information on the websites, causing unrelated individuals and entities in the United States to receive complaints relating to Defendants' fraudulent conduct.

29. At least tens of thousands of victims, residing in all 50 states, have been defrauded by Defendants' scheme.

30. Defendants have collected personal and financial information for hundreds of individuals in the United States obtained via the fraudulent website sales.

31. Victims have suffered, and will continue to suffer, financial losses and identity theft from the fraudulent scheme engaged in and facilitated by Defendants.

32. Defendants' fraudulent scheme is ongoing. Absent injunctive relief by this Court, Defendants' conduct will continue to cause injury to victims.

**COUNT I**  
**(U.S.C. § 1345 – Injunctive Relief)**

33. The United States re-alleges and incorporates by reference Paragraphs 1 through 32 of this Complaint as though fully set forth herein.

34. By reason of the conduct described herein, Defendants violated, are violating, and are about to violate 18 U.S.C. §§ 1343 and 1349 by executing schemes and artifices to defraud for obtaining money or property by means of false or fraudulent representations with the intent to defraud, and, in so doing, use wire communications.

35. Upon a showing that Defendants are committing or about to commit wire fraud, the United States is entitled, under 18 U.S.C. § 1345, to a temporary restraining order, a preliminary injunction, and a permanent injunction restraining all future fraudulent conduct and any other action that this Court deems just in order to prevent a continuing and substantial injury to the victims of fraud.

36. As a result of the foregoing, Defendants' conduct should be enjoined pursuant to 18 U.S.C. § 1345.



**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, United States of America, requests of the Court the following relief:

A. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a hearing and determination of the United States' application for a preliminary injunction, that Defendants, their agents, officers, and employees, and all other persons or entities in active concert or participation with them, are temporarily restrained from:

- (1) committing wire fraud,
- (2) maintaining and doing business through the use of the domain "zerostore.site" and the other domains listed in Attachment A,
- (3) using the domain "zerostore.site" and the other domains listed in Attachment A for any purpose,
- (4) using wire communications to make any false representations relating to the sale of consumer goods or to transmit any materials that contain false or misleading statements relating to the sale of consumer goods,
- (5) destroying business records related to Defendants' business, financial, or accounting operations, and
- (6) taking actions designed to interfere with any additional Court orders regarding these domains.

B. That the Court issue an order requiring the registries, CentralNic Registry and Verisign, Inc., and the registrar, GoDaddy Inc., for

“www.zerostore.site” and the domains listed in Attachment A to take the necessary steps to prevent further use of the websites in Defendants’ fraudulent scheme.

C. That the Court issue a preliminary injunction on the same basis and to the same effect.

D. That the Court issue a permanent injunction on the same basis and to the same effect.

E. That the Court order such other and further relief as the Court shall deem just and proper.

Dated: August 3, 2020

Respectfully submitted,

MARIA CHAPA LOPEZ  
United States Attorney

*/s/ Carolyn B. Tapie*

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**Attachment A**  
to United States'  
Complaint for  
Temporary  
Restraining Order and  
Preliminary and  
Permanent Injunctions

**Internet Domains by Which Defendants are Doing Business**

businessstore.xyz  
guideshop.site  
guideshop.online  
fungoshop.site  
shoeshop.club  
shortsstore.xyz  
babeshop.site  
babestore.site  
lalastore.site  
vintastore.site  
vinsunstore.site  
sadoystore.site  
monstore.site  
kangtastore.site  
doffystore.site  
camzystore.site  
tikidstore.site  
tadastore.site  
zalistore.site  
zerostore.site  
kaylestore.site  
jangstore.site  
padastore.site  
junzestore.site  
kiddstore.site  
sarastore.site  
zindstore.site  
lilastore.site  
nizestore.site  
saramstore.site  
theplaystore.site  
cocastore.site  
seastore.site  
ps3store.site  
uzistore.site  
dracostore.site  
bambostore.site  
tacastore.site  
fackstore.site  
bistore.site  
kangstore.site  
alidastore.site  
atcstore.site

keelinstore.site  
ulastore.site  
neilstore.site  
mushop.site  
tutstore.site  
mabelstore.site  
sugarn.site  
zeldastore.site  
binkystore.site  
bellestore.site  
kiddostore.site  
soulstore.site  
hotstore.site  
azustore.site  
gemstore.site  
nemostore.site  
tomshop.site  
bazone.site  
avastore.site  
delestore.site  
celinatv.site  
selinastore.site  
utrastore.site  
bellami.site  
neala.site  
winifreds.site  
kaneweb.site  
goldwin.site  
thedoris.site  
jocasta.site  
elatifah.site  
pandoratv.site  
vincents.site  
kiddu.site  
zeldas.site  
lucasta.site  
takadas.site  
zinzin.site  
paizin.site  
longka.site  
itaewon.site  
acaciatoy.s.site  
zalata.site  
adeletoys.site  
viviantoy.s.site  
rowantoy.s.site

songtow.site  
kakalot.site  
kangtewon.site  
jangza.site  
lovekids.site  
boxtoys.site  
giselletoys.site  
siennatoys.site  
amitytoys.site  
kerenzatoys.site  
beatrixstore.site  
hildastore.site  
edanatoys.site  
sarahtoys.site  
alicetoys.site  
jessestore.site  
helenstore.site  
roxanatoys.site  
stellatoys.site  
latifahtoys.site  
skybershop.com  
shoestyleone.com  
vallitomart.com  
flacicostore.com  
flamigostore.com  
fugomart.com  
papatimart.com  
fugokids.com  
kidstorepro.com  
globalkidpro.com  
tummykids.com  
ardenkids.com  
tonimart.site  
hobokid.site  
jonikid.site  
kidstore.site  
kidsplaza.site  
habak.site  
skyberstore.site  
katastore.site  
havadstore.site  
paracostore.site  
pacorato.site  
ronnystore.site  
rafastore.site  
babiestore.site

pukastore.site  
haviestore.site  
campustore.site  
cyberstore.site  
fantasticstore.site  
thebluestore.site  
kansestore.site  
kaiserstore.site  
pinkstore.site  
franciastore.site  
ezoza.site  
gilber.site  
flyder.site  
hyberstore.site  
mjsxstore.site  
jinos.site  
zanus.site  
geishies.site  
zavara.site  
tinokitty.site  
kopakids.site  
babyloves.site  
kidstoyshop.site  
vivinostore.site  
lalastore.site  
grandkids.site  
bobie.site  
tikidstore.site  
padastore.site  
junzestore.site  
lilastore.site  
faberstore.site  
garadostore.site  
zanta.site  
ronnyshop.site  
lolykids.site  
grandopa.site  
jannito.site  
nanostore.site  
brainmart.site  
lionkingstore.site  
zarisstore.site  
donystore.site  
donystar.site  
mibstore.site  
mygoodideas.site



frankstore.site  
ronalstore.site  
jinas.site  
nanokids.site  
bibokids.site  
kristinamart.site  
tinoplaza.site  
miomart.site  
greystore.site  
galaxymart.site  
mamostore.site  
catinostore.site  
ridkids.site  
navastore.site  
piomart.site  
ciaostore.site  
riverstore.site  
dallastore.site  
jinofarm.site  
liaviastore.site  
galaco.site  
kajito.site  
kappaus.site  
habaktee.site  
rozistore.site  
grabielstore.site  
rinostore.site  
galadostore.site  
nicolastore.site  
kristinastore.site  
vatinastore.site  
rinostores.site  
zalatastore.site  
dragostore.site  
greenzstore.site  
hallmarkstore.site  
linastore.site  
nanokidz.site  
uggone.site  
kidseven.site  
kidnice.site  
kidfour.site  
zeerabe.site  
rotoskipper.site  
piurared.site  
millystore.s ite

gitasstore.site  
braidfamily.site  
sootgear.site  
umamistore.site  
cubestores.site  
parisvice.site  
victostore.site  
luckysamuend.com  
toygameshophouse.com  
tomeshoponline.com  
beautyshophouse.com  
bestshoptopseller.com  
hotdealshoes.com  
hotdealshoe.com  
myshoestoday.com  
bestshoptophouse.com  
gamehotfriday.com  
tmacmart.com  
hudduti.com  
rainsocker.com  
petmartsuka.com  
pethotsuka.com  
gooddytmart.com  
shophotsocker.com  
cookegoodmart.com  
tmartproshop.com  
jonygocker.com  
buillingshop.com  
ultamartshop.com  
bootdytoys.com  
vivamartjooday.com  
rainsocker.site  
kulistore.shop  
shopforone.site  
kulistoreshop.site  
dadastore.site  
clockforshop.site  
lakeshopzakin.site  
zinzinstore.site  
kisdmartzonzon.site  
sublivestoreshop.site  
tomtomstoreshop.site  
amamashop.site  
shopforone.online  
zinstoreforone.online  
clockforshop.online

clockforshop.xyz  
cuckustore.xyz  
overliveshophouse.site  
zinstorehucklay.site  
daddyshopstore.site  
storeriverstite.site  
fugostoreacnet.site  
ohmyshop.site  
zinstoreforone.site  
cuckustore.site  
myliverever.site  
mylivereversite.site  
themanorcenter.site  
parkviewstore.site  
surishop.site  
babihouseshop.site  
tattooshop.site  
bulerstore.site  
jerrivershop.site  
vendershop.site  
killssuristore.site  
pracudashop.site  
ivectorshop.site  
scubidustore.site  
savilashop.site  
kanlulushop.site  
midustore.site  
tabookshop.site  
microlabshop.site  
redbukk.site  
julyashop.site  
producttopshop.site  
rokostore.site  
stargonstore.site  
megahock.site  
sopheaashop.site  
pdcookshop.site  
packingshop.site  
beolashop.site