

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 13-_____**
v. : **DATE FILED : August 29, 2013**
HORNG DAI, : **VIOLATIONS:**
a/k/a "James Dai" : **18 U.S.C. § 215(a)(2) (receipt by a bank
employee of gifts for procuring loans -
7 counts)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HORNG DAI,
a/k/a "James Dai,"**

an employee of Asian Bank, a financial institution insured by the Federal Deposit Insurance Corporation, corruptly solicited, demanded and accepted for the benefit of himself, a \$500 check from T.H., a person known to the grand jury, made payable to the defendant, intending to be influenced and rewarded in connection with a transaction and the business of Asian Bank, in that, the defendant solicited, received, and converted for his own use, a \$500 check, made payable to the defendant, by leading T.H. to believe that the \$500 check was for bank fees in connection with a loan received by T.H. from Asian Bank.

In violation of Title 18, United States Code, Section 215(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 27, 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HORNG DAI,
a/k/a "James Dai,"**

an employee of Asian Bank, a financial institution insured by the Federal Deposit Insurance Corporation, corruptly solicited, demanded and accepted for the benefit of himself, a \$1,200 check from J.L., a person known to the grand jury, made payable to the defendant, intending to be influenced and rewarded in connection with a transaction and the business of Asian Bank, in that, the defendant solicited, received, and converted for his own use, a \$1,200 check, made payable to the defendant, by leading J.L. to believe that the \$1,200 check was for a mortgage processing fee in connection with a mortgage received by J.L. from Asian Bank.

In violation of Title 18, United States Code, Section 215(a)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HORNG DAI,
a/k/a "James Dai,"**

an employee of Asian Bank, a financial institution insured by the Federal Deposit Insurance Corporation, corruptly solicited, demanded and accepted for the benefit of himself, a \$1,000 check from M.L. and X.Y, persons known to the grand jury, made payable to the defendant, intending to be influenced and rewarded in connection with a transaction and the business of Asian Bank, in that, the defendant solicited, received, and converted for his own use, a \$1,000 check, made payable to the defendant, by leading M.L. and X.Y. to believe that the \$1,000 check was for bank fees in connection with a mortgage loan received by M.L. and X.Y. from Asian Bank.

In violation of Title 18, United States Code, Section 215(a)(2).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 15, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HORNG DAI,
a/k/a "James Dai,"**

an employee of Asian Bank, a financial institution insured by the Federal Deposit Insurance Corporation, corruptly solicited, demanded and accepted for the benefit of himself, a \$1,300 check from E.K., a person known to the grand jury, made payable to the defendant, intending to be influenced and rewarded in connection with a transaction and the business of Asian Bank, in that, the defendant solicited, received, and converted for his own use, a \$1,300 check, made payable to the defendant, by leading E.K. to believe that the \$1,300 check was for bank fees in connection with a loan and line of credit received by E.K. from Asian Bank.

In violation of Title 18, United States Code, Section 215(a)(2).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 20, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HORNG DAI,
a/k/a "James Dai,"**

an employee of Asian Bank, a financial institution insured by the Federal Deposit Insurance Corporation, corruptly solicited, demanded and accepted for the benefit of himself, a \$300 check from T.K., a person known to the grand jury, made payable to the defendant, intending to be influenced and rewarded in connection with a transaction and the business of Asian Bank, in that, the defendant solicited, received, and converted for his own use, a \$300 check, written by T.K.'s wife O.K., made payable to the defendant, by leading T.K. to believe that the \$300 check was for bank fees in connection with a loan received by T.K. from Asian Bank.

In violation of Title 18, United States Code, Section 215(a)(2).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 26, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HORNG DAI,
a/k/a "James Dai,"**

an employee of Asian Bank, a financial institution insured by the Federal Deposit Insurance Corporation, corruptly solicited, demanded and accepted for the benefit of himself, a \$200 check from C.A., a person known to the grand jury, on which the defendant's name was inserted as payee, intending to be influenced and rewarded in connection with a transaction and the business of Asian Bank, in that, the defendant solicited, received, and converted for his own use, a \$200 check, on which the defendant's name was inserted as payee, by leading C.A. to believe that the \$200 check was for bank fees in connection with a loan received by C.A. from Asian Bank.

In violation of Title 18, United States Code, Section 215(a)(2).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 11, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HORNG DAI,
a/k/a "James Dai,"**

an employee of Asian Bank, a financial institution insured by the Federal Deposit Insurance Corporation, corruptly solicited, demanded and accepted for the benefit of himself, a \$600 check from W.K., a person known to the grand jury, made payable to the defendant, intending to be influenced and rewarded in connection with a transaction and the business of Asian Bank, in that, the defendant solicited, received, and converted for his own use, a \$600 check, made payable to the defendant, by leading W.K. to believe that the \$600 check was for bank fees in connection with a loan received by W.K. from Asian Bank.

In violation of Title 18, United States Code, Section 215(a)(2).

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney