

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: Oakland

UNITED STATES OF AMERICA,

v.

KYLE EDWARD MOORE, (a/k/a "Cal"),  
CORTIO DETRICE WADE, (a/k/a "Tea"),  
MARCEL DEVON BRIDGES, (a/k/a "Cell"),  
DERRICKA LYNN FLUKER,

SEALED  
BY COURT ORDER

~~CR13-00555~~ JST

FILED

AUG 15 2013

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

DEFENDANT.

INDICTMENT

18 U.S.C. § 371 – Conspiracy to Commit Financial Aid Fraud  
(2 Counts); 18 U.S.C. § 1343 – Wire Fraud (19 Counts);  
18 U.S.C. § 2 – Aiding and Abetting;  
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Wire  
Fraud Forfeiture

A true bill.

  
Foreman

Filed in open court this 15 day of August, 2013

  
Clerk

  
Bail, \$ no bail warrants for all 4

1 MELINDA HAAG (CABN 132612)  
United States Attorney

2  
3  
4  
5  
6 **SEALED  
BY COURT ORDER**

**FILED**

AUG 15 2013

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

7  
8  
9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,  
14 Plaintiff,

15 v.

16 KYLE EDWARD MOORE, (a/k/a "Cal"),  
17 CORTIO DETRICE WADE, (a/k/a "Tea"),  
18 MARCEL DEVON BRIDGES, (a/k/a "Cell"),  
DERRICKA LYNN FLUKER,

19 Defendants.

NO.

**CR13-00555**

**JST**

) VIOLATIONS: 18 U.S.C. § 371 – Conspiracy to  
) Commit Financial Aid Fraud (2 Counts); 18 U.S.C. §  
) 1343 – Wire Fraud (19 Counts); 18 U.S.C. § 2 –  
) Aiding and Abetting; 18 U.S.C. § 981(a)(1)(C) and  
) 28 U.S.C. § 2461(c) – Wire Fraud Forfeiture

) OAKLAND VENUE  
)  
)

20  
21 INDICTMENT

22 The Grand Jury charges:

23 INTRODUCTORY ALLEGATIONS

24 At all times relevant to this Indictment:

25 1. The United States Department of Education (Education) was a department of the United  
26 States Government with a mission to promote student achievement and preparation for global  
27 competitiveness by fostering educational excellence and ensuring equal access to education. One of the  
28 primary functions of Education was oversight of the administration of Title IV Federal Student

*Handwritten mark*

1 Assistance (FSA) Programs authorized by the Higher Education Act of 1965. As part of its functions,  
2 Education funded and administered multiple FSA Programs for eligible students to receive funds in the  
3 form of loans and grants (hereafter collectively, "Title IV funds") to assist with costs of college  
4 education.

5 2. To be eligible to receive Title IV funds, among other pre-requisites, students generally  
6 had to: (1) hold a high school diploma or its recognized equivalent; (2) be a regular student enrolled, or  
7 accepted for enrollment, in an eligible program at an eligible academic institution; (3) certify that the  
8 funds would be used only for educational purposes; (4) not be then incarcerated in a penal institution;  
9 (5) certify that the student was the actual individual who was applying for the funds, or disclose whether  
10 a preparer assisted in completing the application; and (6) demonstrate financial need, for certain FSA  
11 Programs.

#### 12 FSA PROGRAMS

13 3. The Federal Student Loan Program awarded Title IV funds in the form of low interest  
14 loans to eligible students. Education offered several types of loans, including Stafford Loans, intended  
15 for undergraduate, graduate, and vocational students. There were two types of Stafford Loan programs:  
16 (1) the William D. Ford Federal Direct Loans Program, in which Education was the lender; and (2) the  
17 Federal Family Education Loan Program, in which a third party bank, credit union, or other financial  
18 institution was the lender. Both types of Stafford Loan programs required repayment of the loan, with  
19 interest. The interest payments could be either subsidized or unsubsidized.

20 a. Subsidized Stafford Loans were subsidized by Education and were awarded to  
21 eligible students who demonstrated financial need. Because Education subsidized the interest, student  
22 borrowers were not charged interest while they were enrolled in school at least halftime, were in a grace  
23 period, or were in a deferment period.

24 b. Unsubsidized Stafford Loans were not subsidized by Education and were awarded  
25 to eligible students regardless of financial need. Student borrowers were charged interest that accrued  
26 during any period.

27 4. The Federal Pell Grant Program awarded Title IV funds to eligible students in need of  
28 financial assistance to pursue post-secondary education at an eligible academic institution. The amount

1 depended on, among other things, the student's financial need, costs to attend school, status as a full-  
2 time or part-time student, and intent to attend school for a full academic year or less. A Federal Pell  
3 Grant, unlike a loan, did not have to be repaid by the student unless the student failed to attend, or  
4 withdrew from, school.

#### 5 FSA APPLICATION PROCESS

6 5. In order to be eligible to receive Title IV funds, a student applicant completed and  
7 submitted a Free Application for Federal Student Aid (FAFSA) via the "FAFSA on the Web" website  
8 ([www.fafsa.ed.gov](http://www.fafsa.ed.gov)). In order to electronically sign the FAFSA, each student applied online for, and  
9 received via email, a unique PIN number via the "Federal Student Aid PIN" website ([www.pin.ed.gov](http://www.pin.ed.gov)).  
10 By applying for the PIN number, the student certified that he or she was the person who was submitting  
11 the application. In turn, by signing the FAFSA, the student certified that he or she would use the  
12 financial aid only to pay the cost of attending an institution of higher education, among other things. A  
13 student's completed FAFSA would be electronically transmitted by the student to the Central Processing  
14 System (CPS) in Plano, Texas.

15 6. The CPS analyzed the student applicant's submitted FAFSA application information  
16 using the appropriate federal methodology to calculate the Estimated Family Contribution and also  
17 performed data matching with various other federal agencies to confirm eligibility for FSA Programs,  
18 including Stafford Loans and Pell Grants. Using the FAFSA application information, the CPS  
19 electronically transmitted an Institutional Student Information Record from Plano, Texas, to the schools  
20 the student listed on the FAFSA. The CPS also electronically transmitted a Student Aid Report from  
21 Plano, Texas to the email account provided by the student applicant.

22 7. To apply for a Stafford Loan, the student applicant had to complete a Master Promissory  
23 Note (MPN). By signing the MPN, the student certified that he or she would use the loan proceeds for  
24 authorized educational expenses.

25 8. To apply for a Pell Grant, the student applicant did not have to complete an MPN, but  
26 instead only needed to complete the FAFSA and meet Title IV fund eligibility pre-requisites.

27 9. In an attempt to ensure that Title IV funds were used for educational purposes, the funds  
28 were sent from Education, or from the commercial lender, directly to the academic institution where the

1 student was enrolled. The academic institution held the funds in trust for the benefit of the student and  
2 had the authority first, to apply the funds to the student's tuition balance, and second, to refund excess  
3 funds to the student for other educational expenses incurred while attending school.

4 10. Academic institutions generally disbursed excess funds to the student in the form of a  
5 check, a debit card, or an electronic fund transfer. Check and debit cards would either be mailed to the  
6 student or picked up in person, depending on the academic institution's internal procedures.

#### 7 CALIFORNIA COMMUNITY COLLEGES

8 11. The California Community College (CCC) was a system of public academic institutions  
9 whose admitted students were eligible to apply to receive Title IV funds. The CCC system allowed  
10 prospective students to apply for admission to CCC institutions online via the "CCCApply" website  
11 ([www.cccapply.org](http://www.cccapply.org)).

12 12. XAP Corporation hosted and operated the "CCCApply" website. In order to apply for  
13 online admission to a CCC institution, a prospective student created a personalized online account by  
14 providing basic application information, including name, residence address, email address, telephone  
15 number, Social Security Number, and an account password. The online account allowed a prospective  
16 student to apply to multiple CCC institutions without reentering application information, and to create  
17 an individual CCCApply email account.

18 13. Ohlone College (Ohlone) is a CCC located in Fremont, in the Northern District of  
19 California. Ohlone generally disbursed excess Title IV funds by check directly to the student after  
20 verifying the student's photo identification.

21 14. Chabot College (Chabot) is a CCC located in Hayward, in the Northern District of  
22 California. Chabot generally disbursed excess FSA loan funds by check directly to the student after  
23 verifying the student's photo identification. Chabot generally disbursed Pell Grant funds on a third-  
24 party vendor bank debit card. Chabot students could obtain their Pell Grant funds from third party  
25 vendors in three ways: (1) via a bank debit card mailed to the student; (2) via an electronic fund transfer  
26 to a bank account; or (3) via a check mailed to the student.

27 15. City College of San Francisco (CCSF) is a CCC located in San Francisco, in the Northern  
28 District of California. CCSF generally disbursed excess Title IV funds by check or electronic fund

1 transfer for the first disbursement of the school year. For subsequent disbursements during the school  
2 year, CCSF disbursed funds either in person to the student or via electronic fund transfer to a bank debit  
3 card.

4 THE SCHEME TO DEFRAUD

5 16. From on or about July 7, 2007, through on or about March 1, 2011, in the Northern  
6 District of California and elsewhere, defendants

7 KYLE MOORE (a/k/a "Cal"),  
8 CORTIO WADE (a/k/a "T"),  
9 MARCEL BRIDGES, (a/k/a "Cell"), and  
DERRICKA FLUKER,

10 and others devised and engaged in a scheme and artifice to defraud Education, Ohlone, Chabot, and  
11 CCSF out of money and property, namely Title IV funds, by means of fraudulent pretenses,  
12 representations, and promises.

13 17. In furtherance of the scheme to defraud, defendants and others knowingly and  
14 intentionally prepared, signed, and transmitted false and fraudulent student applications, MPNs, and  
15 FAFSAs. In doing so, defendants and others made false representations about the purported student  
16 applicants' eligibility to obtain Title IV funds, including that: (1) the student applicants held high school  
17 diplomas or its recognized equivalent; (2) the student applicants intended to be regular students enrolled,  
18 or accepted for enrollment, in an eligible program at an eligible academic institution; (3) the student  
19 applicants were the actual individuals who were applying for the funds; and (4) the student applicants  
20 intended to use the funds for authorized educational expenses and to only use the funds to pay the costs  
21 of attending an institution of higher education.

22 18. As a further part of the scheme to defraud, defendants and others recruited third-parties to  
23 serve as "straw students." Defendants and others assisted the straw students in preparing, signing, and  
24 transmitting fraudulent student applications, MPNs, and FAFSAs knowing that many of the straw  
25 students were not eligible to obtain Title IV funds because, among other things, the straw students had  
26 no intention of attending school or using the funds for their intended purpose. In other instances,  
27 defendants and others used the straw students' personal information to prepare, sign, and submit false  
28 and fraudulent student applications, MPNs, and FAFSAs on behalf of the straw students.

1 19. As a further part of the scheme, upon receipt of the Title IV funds, defendants and others,  
2 including straw students, would sometimes share the fraudulently obtained Title IV funds.

3 COUNT ONE: (18 U.S.C. § 371 – Conspiracy to Commit Financial Aid Fraud)

4 20. Paragraphs 1 through 19 of this Indictment are hereby re-alleged and incorporated by  
5 reference as if set forth in full herein.

6 21. Beginning on or about July 7, 2007, through on or about March 1, 2011, in the Northern  
7 District of California and elsewhere, defendants

8 KYLE MOORE (a/k/a “Cal”) and  
9 CORTIO WADE (a/k/a “T”),

10 and others did knowingly and willfully conspire to execute and attempt to execute a material scheme to  
11 commit offenses against the United States, namely to steal, and to obtain by fraud, false statements, and  
12 forgery, Title IV funds provided or insured under subchapter IV of Chapter 28 of Title 20, United States  
13 Code, and part C of subchapter I of Chapter 34 of Title 42, United States Code in violation of Title 20,  
14 United States Code, Section 1097(a).

15 OVERT ACTS

16 22. In furtherance of the conspiracy and to effect the objects of that conspiracy, in the  
17 Northern District of California and elsewhere, defendants and others committed the acts alleged in  
18 Paragraphs 1 through 19 of this Indictment, and the following additional overt acts, among others:

19 a. Between on or about July 7, 2007, and on or about January 5, 2011, MOORE and  
20 others created, and caused to be created, approximately 104 CCCApply accounts, including accounts  
21 with similar passwords such as “maubert” or “maubert2” and with similar home addresses.

22 b. Between on or about July 7, 2007, and on or about January 5, 2011, MOORE,  
23 WADE, and others used CCCApply accounts, as a means to submit admission applications for straw  
24 students to CCCs, including Ohlone, Chabot, and CCSF.

25 c. Between on or about July 7, 2007, and on or about January 5, 2011, MOORE,  
26 WADE, and others transmitted, and caused to be transmitted, FAFSAs to Education for straw students.

27 d. Between on or about July 7, 2007, and on or about January 5, 2011, MOORE,  
28 WADE, and others created, and caused to be created, online PIN numbers for straw students on

1 Education's website.

2 e. On or about May 11, 2010, MOORE, WADE, and others created, and caused to  
3 be created, an online CCCApply account for student L.J. with a password of "maubert" and a home  
4 address on 84th Avenue in Oakland, California (hereafter, "the 84th Avenue residence").

5 f. On or about May 11, 2010, MOORE, WADE, and others transmitted, and caused  
6 to be transmitted, a FAFSA for purported student L.J. with a home address at the 84th Avenue  
7 residence.

8 g. On or about May 11, 2010, MOORE, WADE, and others created, and caused to  
9 be created, an online CCCApply account for student C.W. with a password of "maubert" and a home  
10 address at the 84th Avenue residence.

11 h. On or about May 11, 2010, MOORE, WADE, and others transmitted, and caused  
12 to be transmitted, a FAFSA for purported student C.W. with a home address at the 84th Avenue  
13 residence.

14 i. On or about February 1, 2010, MOORE, WADE, and others created, and caused  
15 to be created, an online CCCApply account for student K.J. with a password of "maubert" and a home  
16 address at the 84th Avenue residence.

17 j. On or about July 8, 2010, MOORE, WADE, and others transmitted, and caused to  
18 be transmitted, a FAFSA for purported student K.J.

19 k. On or about May 11, 2010, MOORE, WADE, and others created, and caused to  
20 be created, an online CCCApply account for student Ca.W. with a password of "maubert" and a home  
21 address at the 84th Avenue residence.

22 l. On or about May 11, 2010, MOORE, WADE, and others transmitted, and caused  
23 to be transmitted, a FAFSA for purported student Ca.W. with a home address at the 84th Avenue  
24 residence.

25 m. On or about February 1, 2010, MOORE, WADE, and others created, and caused  
26 to be created, an online CCCApply account for student E.J. with a password of "maubert."

27 n. On or about February 1, 2010, MOORE, WADE, and others transmitted, and  
28 caused to be transmitted, a FAFSA for purported student E.J.



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

2 COUNT TWO: (18 U.S.C. § 371 – Conspiracy to Commit Financial Aid Fraud)

3 23. Paragraphs 1 through 19 of this Indictment are hereby re-alleged and incorporated by  
4 reference as if set forth in full herein.

5 24. Beginning in or about July 2007, through on or about March 1, 2011, in the Northern  
6 District of California and elsewhere, defendants

7 KYLE MOORE (a/k/a “Cal”),  
8 MARCEL BRIDGES (a/k/a “Cell”), and  
9 DERRICKA FLUKER,

10 and others did knowingly and willfully conspire to execute and attempt to execute a material scheme to  
11 commit offenses against the United States, namely, to steal and to obtain by fraud, false statements, and  
12 forgery, Title IV funds provided or insured under subchapter IV of Chapter 28 of Title 20, United States  
13 Code and part C of subchapter I of Chapter 34 of Title 42, United States Code, in violation of Title 20,  
14 United States Code, Section 1097(a).

15 OVERT ACTS

16 25. In furtherance of the conspiracy and to effect the objects of that conspiracy, in the  
17 Northern District of California and elsewhere, defendants and others committed the acts alleged in  
18 Paragraphs 1 through 19 of this Indictment, and the following additional overt acts, among others:

19 a. Between on or about July 7, 2007, and on or about January 5, 2011, BRIDGES,  
20 FLUKER, and others created, and caused to be created, multiple CCCApply accounts, including  
21 accounts with similar passwords and the same home address in Hayward, California (hereafter, “the  
22 Hayward, California residence”).

23 b. Between on or about July 7, 2007, and on or about January 5, 2011, BRIDGES,  
24 FLUKER, and others used CCCApply accounts, as a means to submit admission applications for straw  
25 students to CCCs, including Ohlone, Chabot, and CCSF.

26 c. Between on or about July 7, 2007, and on or about January 5, 2011, BRIDGES,  
27 FLUKER, and others transmitted, and caused to be transmitted, FAFSAs to Education for straw  
28 students.

1           d.       Between on or about July 7, 2007, and on or about January 5, 2011, BRIDGES,  
2 FLUKER, and others created, and caused to be created, online PIN numbers for straw students on  
3 Education's website.

4           e.       On or about November 19, 2010, BRIDGES, FLUKER, and others created, and  
5 caused to be created, an online CCCApply account for student FLUKER with a home address at the  
6 Hayward, California residence.

7           f.       On or about November 19, 2010, BRIDGES, FLUKER, and others transmitted,  
8 and caused to be transmitted, a FAFSA for purported student FLUKER with a home address at the  
9 Hayward, California residence.

10          g.       On or about November 23, 2010, BRIDGES, FLUKER, and others created, and  
11 caused to be created, an online CCCApply account for student F.F. with a password of "maubert" and a  
12 home address at the Hayward, California residence.

13          h.       On or about November 23, 2010, BRIDGES, FLUKER, and others transmitted,  
14 and caused to be transmitted, a FAFSA for purported student F.F. with a home address at the Hayward,  
15 California residence.

16          i.       On or about November 23, 2010, BRIDGES, FLUKER, and others created, and  
17 caused to be created, an online CCCApply account for student E.B. with a password of "maubert" and a  
18 home address at the Hayward, California residence.

19          j.       On or about November 23, 2010, BRIDGES, FLUKER, and others transmitted,  
20 and caused to be transmitted, a FAFSA for purported student E.B. with a home address at the Hayward,  
21 California residence.

22          k.       On or about November 23, 2010, BRIDGES, FLUKER, and others created, and  
23 caused to be created, an online CCCApply account for student N.K. with a home address at the  
24 Hayward, California residence.

25          l.       On or about November 23, 2010, BRIDGES, FLUKER, and others transmitted,  
26 and caused to be transmitted, a FAFSA for purported student N.K. with a home address at the Hayward,  
27 California residence.

28          m.       On or about November 23, 2010, BRIDGES, FLUKER, and others created, and

1 caused to be created, an online CCCApply account for student C.W. with a password of "maubert" and a  
2 home address at the Hayward, California residence.

3 n. On or about November 23, 2010, BRIDGES, FLUKER, and others transmitted,  
4 and caused to be transmitted, a FAFSA for purported student C.W. with a home address at the Hayward,  
5 California residence.

6 o. On or about November 23, 2010, BRIDGES, FLUKER, and others created, and  
7 caused to be created, an online CCCApply account for student S.W. with a password of "maubert."

8 p. On or about January 4, 2011, BRIDGES, FLUKER, and others transmitted, and  
9 caused to be transmitted, a FAFSA for purported student S.W.

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

11 COUNTS THREE THROUGH TWENTY ONE: (18 U.S.C. §§ 1343 & 2 – Wire Fraud; Aiding and  
12 Abetting)

13 26. Paragraphs 1 through 19 of this Indictment are hereby re-alleged and incorporated by  
14 reference as if set forth in full herein.

15 27. Beginning in or about July 2007 through on or about March 1, 2011, in the Northern  
16 District of California and elsewhere, defendants

17 KYLE MOORE (a/k/a "Cal"),  
18 CORTIO WADE (a/k/a "T"),  
19 MARCEL BRIDGES (a/k/a "Cell"), and  
DERRICKA FLUKER,

20 for the purpose of executing a scheme and artifice to defraud as to a material matter, and for obtaining  
21 money and property by means of materially false and fraudulent pretenses, representations, promises,  
22 and omissions, did knowingly transmit and cause to be transmitted the following wire communications

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 in interstate commerce from the Northern District of California to Plano, Texas:

COUNT	DEFENDANT	DATE OF WIRE	WIRE DESCRIPTION
3	BRIDGES	August 15, 2008	FAFSA for purported student BRIDGES
4	MOORE	February 19, 2009	FAFSA for purported student B.B.
5	BRIDGES	March 30, 2009	FAFSA for purported student BRIDGES
6	MOORE	June 21, 2009	FAFSA for purported student P.B.
7	MOORE	January 5, 2010	FAFSA for purported student C.N.
8	MOORE and WADE	February 1, 2010	FAFSA for purported student E.J.
9	MOORE	March 24, 2010	FAFSA for purported student C.N.
10	BRIDGES	May 7, 2010	FAFSA for purported student BRIDGES
11	MOORE and WADE	May 11, 2010	FAFSA for purported student L.J.
12	MOORE and WADE	May 11, 2010	FAFSA for purported student Ca.W.
13	MOORE and WADE	May 11, 2010	FAFSA for purported student Cl.W.
14	MOORE	May 12, 2010	FAFSA for purported student P.M.
15	MOORE and WADE	July 8, 2010	FAFSA for purported student K.J.
16	BRIDGES and FLUKER	November 19, 2010	FAFSA for purported student FLUKER
17	BRIDGES and FLUKER	November 23, 2010	FAFSA for purported student F.F.
18	BRIDGES and FLUKER	November 23, 2010	FAFSA for purported student E.B.
19	BRIDGES and FLUKER	November 23, 2010	FAFSA for purported student N.K.
20	BRIDGES and FLUKER	November 23, 2010	FAFSA for purported student C.W
21	BRIDGES and FLUKER	January 4, 2011	FAFSA for purported student S.W.

25 All in violation of Title 18, United States Code, Sections 1343 and 2.

26 ///

27 ///

28 ///

1 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Wire Fraud  
2 Forfeiture)

3 28. Paragraphs 1 through 27 of this Indictment are hereby realleged and incorporated by  
4 reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section  
5 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

6 29. Upon a conviction of any of the offenses alleged in Counts Three through Twenty One,  
7 the defendants

8 KYLE MOORE (a/k/a “Cal”),  
9 CORTIO WADE (a/k/a “T”),  
10 MARCEL BRIDGES (a/k/a “Cell”), and  
DERRICKA FLUKER,

11 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and  
12 Title 28, United States Code, Section 2461(c), all right, title, and interest in property, real and personal,  
13 constituting, derived from, or traceable to the proceeds that defendant obtained directly or indirectly as a  
14 result of the offenses.

15 30. If, as a result of any act or omission of any defendant, any of said property

- 16 a. cannot be located upon the exercise of due diligence;  
17 b. has been transferred or sold to, or deposited with, a third person;  
18 c. has been placed beyond the jurisdiction of the Court;  
19 d. has been substantially diminished in value; or  
20 e. has been commingled with other property which cannot be divided without  
21 difficulty;

22 any and all interest any defendant has in any other property, up to value of the property described above,

23 ///

24 ///

25 ///

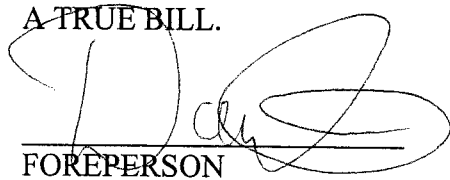
26 ///

27 ///

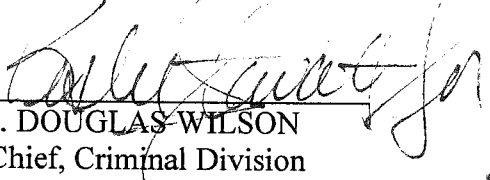
28 ///


1 shall be forfeited to the United States, pursuant to Title 21, United States Code, Section 853(p), as  
2 incorporated by Title 18, United States Code, Section 982(b)(1).

4 DATED: August 15, 2013

A TRUE BILL.  
  
FOREPERSON

7 MELINDA HAAG  
8 United States Attorney

9   
10 J. DOUGLAS WILSON  
11 Chief, Criminal Division

12 (Approved as to form:   
13 AUSA WADE M. RHYNE