

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

**FILED**

JUN 09 2014

Phil Lombardi, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,	)	Case No. 14-CR-073-CVE
	)	
Plaintiff,	)	<u>FILED UNDER SEAL</u>
	)	
v.	)	<u>SUPERSEDING INDICTMENT</u>
	)	[COUNT 1: 18 U.S.C. § 371 –
TIM MINH TRAN, a/k/a “Manh	)	Conspiracy; 18 U.S.C. § 2 – Aiding
Minh Tran”, a/k/a “Tim”,	)	and Abetting;
BAN LAM,	)	COUNTS 2 and 3: 18 U.S.C. § 545 –
JASON ERIC JOHNSON,	)	Smuggling Merchandise into the
a/k/a “Jay”,	)	United States; 18 U.S.C. § 2: Aiding
CHEN CUI FENG, a/k/a “Helen”,	)	and Abetting;
HUONG THI DAO,	)	COUNT 4: 18 U.S.C. § 1956(h) –
a/k/a “Heather”,	)	Money Laundering Conspiracy; 18
LIEM THANH VU, a/k/a “Johnny”,	)	U.S.C. § 2 – Aiding and Abetting;
MINH THANH PHAM,	)	Forfeiture Allegation: 18 U.S.C.
DUC HUY VU,	)	§§ 982(a)(2)(B) and 982(a)(1) –
a/k/a “Joe”,	)	Smuggling and Money Laundering
STANLEY WAYNE GUNTER,	)	Forfeiture]
ARIEL NICOLE ROBINSON DUNN,	)	
DENIS HENRI LANGEVIN,	)	
	)	
Defendants.	)	

**THE GRAND JURY CHARGES:**

COUNT ONE  
[18 U.S.C. §§ 371 AND 2]

INTRODUCTION

PERSONS AND ENTITIES

At all times relevant to this Superseding Indictment:

1. **TIM MINH TRAN**, a/k/a “Manh Minh Tran”, a/k/a “Tim”, hereinafter “Defendant **TRAN**”, a resident of Baton Rouge, Louisiana, owned and operated THC

ETC, LLC, Tim's Wholesale, Kush Incense, LLC, Group Construction, LLC, and Novelty Worldwide LLC, limited liability companies doing business in Baton Rouge, Louisiana, and elsewhere and engaged in activities in and affecting interstate and foreign commerce.

2. **BAN LAM**, hereinafter "Defendant **LAM**", a resident of Broken Arrow, in the Northern District of Oklahoma, owned and operated Instant Packaging, LLC, and Good Time Smoke Shop, LLC, limited liability companies that did business in Baton Rouge, Louisiana, and elsewhere and engaged in activities in and affecting interstate and foreign commerce. Defendant **LAM** controlled numerous bank accounts including checking accounts at JPMorgan Chase Bank, hereinafter "Chase Bank", those are, account number XXX2936 and account number XXX2202.

3. **JASON ERIC JOHNSON**, a/k/a "Jay", hereinafter "Defendant **JOHNSON**", a resident of Las Vegas, Nevada, owned and operated Sin City Distribution, LLC, a limited liability company that did business in Las Vegas, Nevada, and elsewhere and engaged in activities in and affecting interstate and foreign commerce.

4. **CHEN CUI FENG**, a/k/a "Helen", hereinafter "Defendant **CHEN**", a resident of Dongguan, Guangdong Province, in the People's Republic of China, hereinafter "China", engaged in activities in and affecting foreign commerce as various companies doing business in China and elsewhere, including the following: York Ming & Homedollar Company; Zhou Qunde Textiles Company; Huizhou Heng Xin Import & Export Company; Huizhou Bobilion Import & Export; Shanghai Shenghua Pharmaceutic;

Shanghai I En Guan Shi II Company; Shanghai Wanquan Shiye Company; Shanghai Wanquan Shite Company; Shanghai Huatinghuagong; and SH Chuantao Imp & Exp Trading Company Ltd.; and York Ming Int Enterprise Limited. Defendant **CHEN** controlled numerous bank accounts including accounts at Bank of China, Shanghai Bank, and Bank of Hong Kong.

5. **HUONG THI DAO**, a/k/a “Heather”, hereinafter “Defendant **DAO**”, a resident of Broken Arrow, in the Northern District of Oklahoma, owned and operated La Venus Massage and Spa, LLC, hereinafter “La Venus Massage”, a massage parlor that was located and did business in Tulsa, Oklahoma, and engaged in activities in and affecting interstate and foreign commerce. Defendant **DAO** controlled numerous bank accounts including a checking account at Bank of Oklahoma, N.A., hereinafter “BOK”, that is, account number XXX2952, and a checking account at Chase Bank, account number XXX1390.

6. **LIEM THANH VU**, a/k/a “Johnny”, hereinafter “Defendant **LIEM VU**”, resided in New Orleans, Louisiana.

7. **MINH THANH PHAM**, hereinafter “Defendant **PHAM**”, resided in Huntington Beach, California.

8. **DUC HUY VU**, a/k/a “Joe”, hereinafter “Defendant **DUC VU**”, sometimes resided in New Orleans, Louisiana, and at other times resided in Santa Ana, California

9. **STANLEY WAYNE GUNTER**, hereinafter “Defendant **GUNTER**”, a resident of Denham Springs, Louisiana, owned and operated The Attic, a business in



Baton Rouge, Louisiana, and engaged in activities in and affecting interstate and foreign commerce.

10. **ARIEL NICOLE ROBINSON DUNN**, hereinafter “Defendant **DUNN**”, a resident of Baton Rouge, Louisiana, owned and operated Kreative Kreole, LLC, a limited liability company that did business in Baton Rouge and elsewhere and engaged in activities in and affecting interstate and foreign commerce. Prior to operating Kreative Kreole, Defendant **DUNN** was employed at The Attic 2 and Herbz N Legendz, businesses in Baton Rouge, Louisiana.

11. **DENIS HENRI LANGEVIN**, hereinafter “Defendant **LANGEVIN**”, a resident of Anthony, New Mexico, engaged in activities in and affecting interstate and foreign commerce and controlled numerous bank accounts including checking accounts at: Chase Bank, account numbers XXX0570 and XXX6360; Bank of America (“BOA”), account numbers XXX3227 and XXX1915; and Wells Fargo Bank, account number XXX3893.

#### **IMPORTATION PROCEDURES**

12. Shipments of goods arriving at any port of the United States had to be granted “entry,” or clearance, by the Department of Homeland Security, United States Customs and Border Protection, hereinafter “Customs”, prior to the goods being allowed to move beyond the port.

13. Statutes and regulations governing the importation process, including but not limited to Title 18, United States Code, Sections 541 and 542, required persons

bringing merchandise into the United States to provide truthful and complete statements to Customs about the merchandise.

14. Merchandise could enter the United States via an "informal entry." Informal entries were permitted for merchandise meeting certain criteria, including having a value of \$2,000 or less. The importer was required to accurately list the contents of the package, country of origin, and value of the contents on a shipping label. Customers of commercial carriers, such as express mail services, commonly imported merchandise via informal entry procedures.

15. Due to the large volume of cargo that arrived at United States ports each day, Customs sometimes cleared shipments without manually inspecting the contents of the shipments. In such instances, Customs relied entirely on information provided in a shipping label for an informal entry. When Customs cleared an informal entry shipment, the carrier for the package resumed possession of the package for delivery to the addressee.

#### **THE CONSPIRACY AND ITS OBJECTS**

16. Beginning as early as some time in or about April 2011, a more exact date being unknown to the Grand Jury, and continuing to the date of this Superseding Indictment, in the Northern District of Oklahoma and elsewhere, **TIM MINH TRAN**, a/k/a "Manh Minh Tran", a/k/a "Tim", **BAN LAM, JASON ERIC JOHNSON**, a/k/a "Jay", **CHEN CUI FENG**, a/k/a "Helen", **HUONG THI DAO**, a/k/a "Heather", **LIEM THANH VU**, a/k/a "Johnny", **MINH THANH PHAM, DUC HUY VU**, a/k/a "Joe",

STANLEY WAYNE GUNTER, ARIEL NICOLE ROBINSON DUNN, and DENIS HENRI LANGEVIN, the defendants, knowingly, intentionally, and willfully combined, conspired, confederated, and agreed together, each with the other, and with others known and unknown to the Grand Jury to:

a. Defraud the United States by impairing, impeding, obstructing, and defeating through deceitful and dishonest means the lawful government functions of Customs; and

b. Commit offenses against the United States in violation of Title 18, United States Code, Section 545, as follows:

i. Willfully and knowingly, and with intent to defraud the United States, smuggle and clandestinely introduce into the United States merchandise which should have been truthfully invoiced;

ii. Willfully and knowingly, and with intent to defraud the United States, pass through the customhouse false and fraudulent invoices and other documents and papers; and

iii. Fraudulently and knowingly receive, conceal, buy, sell, and in any manner facilitate the transportation, concealment, and sale of merchandise imported contrary to law after the importation thereof, then knowing that said merchandise had been imported and brought into the United States contrary to law.

#### **PURPOSE OF THE CONSPIRACY**

17. It was a purpose of the conspiracy that the defendants, and others known and unknown to the Grand Jury, would and did enrich themselves through smuggling.



### MANNER AND MEANS

18. The conspirators used the following manner and means, among others, to accomplish the objects of the conspiracy:

19. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did order merchandise from China by email.

20. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did create invoices, and cause invoices to be created that falsely and fraudulently described the merchandise to be shipped and their value.

21. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did create documents and air waybills and caused documents and air waybills to be created that falsely and fraudulently described the merchandise and their value.

22. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did purposefully use erroneous zip codes on air waybills for parcels from China.

23. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did subsequently provide information to replace the erroneous zip codes after the shipments cleared Customs.

24. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did receive smuggled merchandise at residences, businesses, and other

locations in the Northern District of Oklahoma and elsewhere, including Oklahoma, Nevada, Louisiana, California and New Jersey.

25. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did communicate using text messages to discuss payments, tracking numbers, and their smuggling activities.

26. Defendants and their Coconspirators, known and unknown to the Grand Jury, would and did sell and distribute the smuggled merchandise, from which they derived significant proceeds.

#### **OVERT ACTS**

27. To effect the objects of the conspiracy and to accomplish its purposes and objectives, Defendants and their Coconspirators, known and unknown to the Grand Jury, committed the following overt acts, among others, in the Northern District of Oklahoma and elsewhere:

28. In or about April 2011, Defendant **TRAN** ordered merchandise from York Ming Int Enterprise Limited to be smuggled into the United States from China.

29. In or about July 2011, Defendant **TRAN** ordered a shipment of merchandise from Hang Zhou Jin Chin Co., Ltd. in China to be delivered to Defendant **TRAN** at Tim's Wholesale, 4000 Florida Blvd in Baton Rouge, Louisiana. The merchandise which was falsely and fictitiously described on the air waybill actually contained AM-2201. The parcel was identified by tracking number EE405278208CN.



30. On or about December 29, 2011, Defendant **TRAN** deposited \$95,300.04 to Regions Bank account, number XXX7076, in the name of Tim M. Tran. Proceeds of the deposit were received from S & S Wholesale for the purchase of merchandise to be smuggled at later date into the United States from China.

31. On or about January 13, 2012, Defendant **TRAN** faxed his Commercial Rental Application from Tim's Wholesale fax number 225-302-5383 in Baton Rouge, Louisiana, to fax number 918-369-9315 in Tulsa, Oklahoma, for the purpose of renting a commercial property at 8222 E. 103<sup>rd</sup> Street, Tulsa, Oklahoma, a property in which the storefront for La Venus Massage would be located.

32. On or about March 13, 2012, Defendant **TRAN** authorized the repair of a machine owned by Instant Packaging, a company owned and controlled by Defendant **LAM**, for the purpose of packaging merchandise smuggled into the United States from China.

33. In or about May 2012, Defendant **LAM** ordered a shipment of merchandise from China for delivery to Defendant **LAM**. The merchandise which was falsely and fictitiously described on the air waybill as "Calcium Stearate", commonly used as a surface conditioner in hard candies, actually contained XLR11. The parcel was identified by tracking number 9747321345.

34. In or about July 2012, Defendant **LAM** received smuggled merchandise from China which was then delivered to Defendant **GUNTER** at The Attic 2 in Baton Rouge, Louisiana.

35. In or about late September 2012, Defendant **PHAM** ordered a shipment of merchandise from China for delivery to his residence. The merchandise which was falsely and fictitiously described on the air waybill as "Sodium Alginate", commonly used as a food stabilizer for dairy products, actually contained 5F-AKB48, an analogue of AKB-48. The parcel was identified by tracking number 9966112656.

36. On or about the dates stated in the chart below, Defendants **LAM** and **MINH** used the text messages identified below to discuss where and when packages should be shipped:

Date	Text From	Message
09/07/12	MINH	"2 cuc to... Mountains Edge Distribution 64 Honors Course Las Vegas, NV 89148"
09/07/12	LAM	"Ok"
09/07/12	MINH	"Friday delivery...?"
09/07/12	LAM	"I'll check"

37. On or about the dates stated in the chart below, Defendants **LAM** and **JOHNSON** used the text messages identified below to discuss tracking numbers for shipments, destination addresses, and amounts of cash deposited and to be deposited in bank accounts:

<b>Date</b>	<b>Text From</b>	<b>Message</b>
10/01/12	JOHNSON	"Got 2"
10/01/12	LAM	"Ok"
10/01/12	JOHNSON	"Your money is there."
10/01/12	LAM	"Thank you"
10/05/12	JOHNSON	"?"
10/05/12	LAM	"Yes, they will ship it tonite"
10/05/12	LAM	"I am sending them money right now"
10/05/12	LAM	"Have u put money in my account yet?"
10/05/12	JOHNSON	"Going now"
10/05/12	LAM	"Ok"
10/05/12	JOHNSON	"Just got home"
10/05/12	JOHNSON	"I'll have it tomorrow?"
10/05/12	LAM	"Yes, that's what they told me"
10/05/12	JOHNSON	"Ok"

38. On or about September 10, 2012, Defendant **TRAN** wired \$5,000, drawn on Regions Bank account, number XXX7076, in the name of Tim M. Tran, to La Venus Massage Bank of Oklahoma account number XXXX-2952 to Defendant **DAO**.

39. In or about October 2012, Defendant **LAM** received at least eight parcels shipped from China to his residence, with the merchandise falsely and fictitiously described on the air waybills as "Sodium Alginate", commonly used as a food stabilizer for dairy products, with the parcels bearing the following tracking numbers:

- a. 8069923805;
- b. 8071490453;
- c. 8074652762;
- d. 8078245571;
- e. 8082930076;
- f. 8085106304;
- g. 8086699526; and
- h. 9967664630.



40. On or about the dates stated in the chart below, Defendant **LAM** and “Person A”, an individual whose identity is known to the Grand Jury, used the text messages identified below to discuss using Defendant **GUNTER**’s credit card to pay for a misleading lab report:

Date	Text From	Message
10/04/12	LAM	“Ai biotech going to call u for Stanley’s New credit card # for the lab report”
10/04/12	PERSON “A”	“They just called and we gave them ok for the funds. Test be ready tomorrow night. Thanks”
10/04/12	LAM	“Thank you”

41. On or about October 15, 2012, Defendants **LAM** and **DUNN** used the text messages identified below to discuss and coordinate the delivery of smuggled merchandise:

Date	Text From	Message
10/15/12	LAM	“Do you have anyone that can sit at the attic for a package?”
10/15/12	DUNN	“Shawn”
10/15/12	LAM	“Ok”
10/15/12	DUNN	“I’m actually gonna send jena”
10/15/12	LAM	“Ok”

42. On or about the dates stated in the chart below, Defendants **LAM** and **LIEM VU** used the text messages identified below to discuss changing false zip codes after smuggled merchandise cleared Customs:

<b>Date</b>	<b>Text From</b>	<b>Message</b>
10/19/12	LIEM VU	"Can you check your email?"
10/19/12	LAM	"Ok"
10/19/12	LAM	"Placed the order"
10/19/12	LIEM VU	"Cool thanks when it lands I can meet you in br and pay if your in town"
10/19/12	LAM	"Ok"
10/19/12	LAM	"When I give you the tracking#, you'll have to call dhl to change the zip code. I gave her an NY zip code to get them here"
10/19/12	LIEM VU	"Oh can you still call n change? Or you gave ny zip on purpose?"
10/19/12	LAM	"In purpose, gets thru custom a lot easier"
10/19/12	LAM	"East coast"
10/22/12	LIEM VU	"When do I call in change zip code?"
10/22/12	LAM	"Just call dhl when u see them get to the us"
10/22/12	LIEM VU	"Oh once it gets in?"
10/22/12	LAM	"Yes"
10/23/12	LAM	"808 699 9526 is CA, 808 699 6726 for CA, both is FAK"

43. On or about October 25, 2012, Defendant **DUNN** sent a text message to Defendant **LAM** to confirm that smuggled merchandise had been shipped to a lab to obtain a misleading lab report.

44. On or about the dates stated in the chart below, Defendants **LAM** and **JOHNSON** used the text messages identified below to discuss tracking numbers for shipments, destination addresses and zip codes, and deposits of cash into bank accounts:

Date	Text From	Message
10/22/12	LAM	"808 5098 534 to NV"
10/22/12	LAM	"I am also overnight ua box"
10/22/12	JOHNSON	"Which address?"
10/22/12	JOHNSON	"Let's not send to boulder high way anymore"
10/22/12	LAM	"Ok"
10/22/12	LAM	"Check it and you can also give them a whole new address"
10/22/12	JOHNSON	"Just deposit \$9500 personal account."
10/30/12	JOHNSON	"I'll deposit tomorrow."
10/30/12	LAM	"Ok thanks"
10/30/12	JOHNSON	"I have more coming?"
10/30/12	LAM	"Did u get any today?"
10/30/12	JOHNSON	"Other day."
10/30/12	JOHNSON	"4 went to kellyberry"
10/30/12	LAM	"U should be getting some in a couple of days"
10/30/12	LAM	"But some got held in ny"
10/30/12	LAM	"She'll send more"
10/30/12	JOHNSON	"What's up with dhl ?"
10/30/12	LAM	"Nothing yet"
10/30/12	LAM	"She's sending more"
10/30/12	JOHNSON	"4805.east Montara circle las vegas 89121 Sin city distribution inc."
10/30/12	LAM	"Ok"
10/30/12	JOHNSON	"7272 Plushstone ave Las Vegas nv 89148 Ted Johnson"
10/30/12	JOHNSON	"I'm going to call DHL."
10/30/12	LAM	"Ok kool"

45. In or about late October 2012, Defendant **LAM** ordered a shipment of merchandise from China for delivery to his residence. The merchandise which was falsely and fictitiously described on the air waybill as "Sodium Alginate", commonly used as a food stabilizer for dairy products, actually contained XLR-11. The parcel was identified by tracking number 9967664630.



46. On or about November 16, 2012, Defendants **LAM** and **LIEM VU** used the text messages identified below to discuss shipments and cash to be deposited into bank accounts:

Date	Text From	Message
11/16/12	LIEM VU	"Hey you called?"
11/16/12	LAM	"Yeah, I emailed u a tracking that was delivered on the 14 <sup>th</sup> for one akb"
11/16/12	LIEM VU	"Ok. Joe receive your email all ten ur came in and signed so he will deposit some today and the rest tomorrow"
11/16/12	LAM	"Ok, kool"

47. On or about November 17, 2012, Defendants **LAM** and **DUC VU** used the text messages identified below to discuss payments made and additional packages to be shipped:

Date	Text From	Message
11/17/12	DUC VU	"Hey this is joe johnnys brother"
11/17/12	LAM	"What up"
11/17/12	DUC VU	"Deposited 8 yesterday and 8 today"
11/17/12	LAM	"Yes thank you"
11/17/12	DUC VU	"Can u ship another 10 monday"
11/17/12	LAM	"Yes, ok"

48. As stated in the chart below, the merchandise descriptions used by Defendants and their Coconspirators had diverse common uses. In or about November 2012, Defendants caused approximately twenty-nine parcels identified by the FedEx tracking numbers and addressees as stated in the chart below, to enter the United States from China, with the falsely stated merchandise description named below:

<b>Air Waybill Number</b>	<b>Falsely Stated Description of Merchandise</b>	<b>Common Use</b>	<b>Addressee:</b>
546490247010	"Silicon Dioxide"	Food Additive	Kreative Kreole LLC: Baton Rouge, LA
800745193772	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	F Johnson: Las Vegas, NV
802112839448	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Sin City Distribution: Las Vegas, NV
802112839459	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Ted Johnson: Las Vegas, NV
546490247752	"Silicon Dioxide"	Food Additive	Ham: Huntington Beach, CA
546490248082	"Silicon Dioxide"	Food Additive	Sin City Distribution: Las Vegas, NV
546490248093	"Silicon Dioxide"	Food Additive	Ted Johnson: Las Vegas, NV
802112839460	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Ted Johnson: Las Vegas, NV
546490248060	"Silicon Dioxide"	Food Additive	Ham: Huntington Beach, CA
546490248299	"Silicon Dioxide"	Food Additive	Ham: Huntington Beach, CA
546490248288	"Silicon Dioxide"	Food Additive	Sin City Distribution: Las Vegas, NV
802112839470	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Sin City Distribution: Las Vegas, NV
546490248704	"Silicon Dioxide"	Food Additive	Ham: Huntington Beach, CA
546490249505	"Silicon Dioxide"	Food Additive	General Merchandise: Patterson, NJ
800745193886	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Jamil Car Care: Fullerton, CA
802112839518	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Mead Valley Feed: Perris, CA
546490249479	"Silicon Dioxide"	Food Additive	Mead Valley Feed: Perris, CA
802112839507	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	General Merchandise: Patterson, NJ



<b>Air Waybill Number</b>	<b>Falsely Stated Description of Merchandise</b>	<b>Common Use</b>	<b>Addressee:</b>
800745193875	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Lam: Broken Arrow, OK
546490249480	"Silicon Dioxide"	Food Additive	Sin City Distribution: Las Vegas, NV
546490249490	"Silicon Dioxide"	Food Additive	Ted Johnson: Las Vegas, NV
802112839492	"Hydroxypropyl Methylcellulose"	Coating Agent/File Former	Sin City Distribution : Las Vegas, NV
546490249516	"Silicon Dioxide"	Food Additive	Ham: Huntington Beach, CA
802112839779	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	Sin City Distribution: Las Vegas, NV
546490250060	"Silicon Dioxide"	Food Additive	Sin City Distribution: Las Vegas, NV
802112839780	"Hydroxypropyl Methylcellulose"	Coating Agent/Film Former	LAM: Broken Arrow, OK
546490250050	"Silicon Dioxide"	Food Additive	LAM: Broken Arrow, OK
802112839746	"Vinyl Acelate Ethylen Copolymer Redisersible powder"	Glue Sticks/Soccer Cleats	LAM: Broken Arrow, OK
802112839757	"Vinyl Acelate Ethylen Copolymer Redisersible powder"	Glue Sticks/Soccer Cleats	Ted Johnson: Broken Arrow, OK

49. From in or about January 2013 to in or about March 2013, Defendant **DAO** received at least twelve parcels, shipped from China to La Venus Massage. The merchandise which was falsely and fictitiously described on the fraudulent air waybills, containing smuggled merchandise described as "Acrylic Paint", "Boron Nitride",



commonly used in cosmetics, and "Potassium Carbonate", commonly used to make soap.

The parcels were identified by the following tracking numbers:

- a. 7756448453;
- b. 802114227874;
- c. 9436327935;
- d. 9437827103;
- e. 801684284110;
- f. 801684284186;
- g. 9409533453;
- h. 9411694224;
- i. 802114228057;
- j. 9424925963;
- k. 9426689403; and
- l. 9428467403.

50. In or about late March 2013, Defendant **DAO** ordered a shipment of merchandise from China for delivery to her business, La Venus Massage. The merchandise which was falsely and fictitiously described on the air waybill as "Acrylic Paint", actually contained XLR-11. The parcel was identified by tracking number 9426689403.

All in violation of Title 18, United States Code, Sections 371 and 2.

**COUNT TWO**  
**[18 U.S.C. §§ 545 and 2]**

51. The allegations contained in paragraphs one through fifty-three of Count One of this Superseding Indictment are realleged and incorporated as if fully set forth in this paragraph.

52. On or about November 15, 2012, in the Northern District of Oklahoma, **TIM MINH TRAN**, a/k/a “Manh Minh Tran”, a/k/a “Tim”, **BAN LAM, JASON ERIC JOHNSON**, a/k/a “Jay”, **CHEN CUI FENG**, a/k/a “Helen”, **HUONG THI DAO**, a/k/a “Heather”, **LIEM THANH VU**, a/k/a “Johnny”, **MINH THANH PHAM, DUC HUY VU**, a/k/a “Joe”, **STANLEY WAYNE GUNTER, ARIEL NICOLE ROBINSON DUNN**, and **DENIS HENRI LANGEVIN**, fraudulently and knowingly received, concealed, bought, and sold merchandise, and in any manner facilitated the transportation, concealment, and sale of such merchandise, after importation, knowing that such merchandise had been imported and brought into the United States contrary to law, including but not limited to violations of Title 18, United States Code, Sections 541 and 542; Title 19, United States Code, Sections 1436(a) and 1592(a).

All in violation of Title 18, United States Code, Sections 545 and 2.

**COUNT THREE**  
**[18 U.S.C. §§ 545 and 2]**

53. The allegations contained in paragraphs one through fifty-three of Count One of this Superseding Indictment are realleged and incorporated as if fully set forth in this paragraph.

54. On or about February 4, 2013, in the Northern District of Oklahoma, **TIM MINH TRAN**, a/k/a "Manh Minh Tran", a/k/a "Tim", **BAN LAM, JASON ERIC JOHNSON**, a/k/a "Jay", **CHEN CUI FENG**, a/k/a "Helen", **HUONG THI DAO**, a/k/a "Heather", **LIEM THANH VU**, a/k/a "Johnny", **MINH THANH PHAM, DUC HUY VU**, a/k/a "Joe", **STANLEY WAYNE GUNTER, ARIEL NICOLE ROBINSON DUNN**, and **DENIS HENRI LANGEVIN**, the defendants, fraudulently and knowingly received, concealed, bought, and sold merchandise, and in any manner facilitated the transportation, concealment, and sale of such merchandise, after importation, knowing that such merchandise had been imported and brought into the United States contrary to law, including violations of, but not limited to, Title 18, United States Code, Sections 541 and 542; Title 19, United States Code, Sections 1436(a) and 1592(a).

All in violation of Title 18, United States Code, Sections 545 and 2.



**COUNT FOUR**  
**[18 U.S.C. §§ 1956(h) and 2]**

**THE CONSPIRACY**

55. The allegations contained in paragraphs one through fifty-three of Count One of this Superseding Indictment are realleged and incorporated as if fully set forth in this paragraph.

56. From at least as early as some time in or about April 2011 and continuing thereafter until the date of this Superseding Indictment, in the Northern District of Oklahoma and elsewhere, **TIM MINH TRAN**, a/k/a “Manh Minh Tran”, a/k/a “Tim”, **BAN LAM**, **JASON ERIC JOHNSON**, a/k/a “Jay”, **CHEN CUI FENG**, a/k/a “Helen”, **HUONG THI DAO**, a/k/a “Heather”, **LIEM THANH VU**, a/k/a “Johnny”, **MINH THANH PHAM**, **DUC HUY VU**, a/k/a “Joe”, **STANLEY WAYNE GUNTER**, and **DENIS HENRI LANGEVIN**, the defendants, knowingly and intentionally combined, conspired, confederated, and agreed together, each with the other, and with others known and unknown to the Grand Jury, to commit the following offenses in violation Title 18, United States Code, Sections 1956 and 1957:

- (a) To conduct financial transactions which involve the proceeds of specified unlawful activity, namely, smuggling in violation of Title 18, United States Code, Section 545, with the intent to promote the carrying on of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);
- (b) To conduct financial transactions which involve the proceeds of specified unlawful activity, namely, smuggling in violation of Title 18, United States Code, Section 545, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the

ownership, and the control of the proceeds of specified unlawful activity, a violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

- (c) To transport, transmit, and transfer monetary instruments and funds from a place inside the United States to a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, namely smuggling in violation of Title 18, United States Code, Section 545, a violation of Title 18, United States Code, Section 1956(a)(2)(A);
- (d) To conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, smuggling, in violation of Title 18, United States Code, Section 545, knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under federal law and that while conducting and attempting to conduct such financial transactions knowing that the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(ii); and
- (e) To engage in monetary transactions by, through and to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property that was of a value greater than \$10,000, that is, the deposit, withdrawal, transfer, and exchange of United States currency, funds, and monetary instruments, such property having been derived from specified unlawful activity, namely, smuggling in violation of Title 18, United States Code, Section 545, in violation of Title 18, United States Code, Section 1957.

#### **MANNER AND MEANS**

57. The manner and means by which Defendants and their Coconspirators sought to accomplish the objects of the conspiracy included, among other things, the following:

58. It was a part of the conspiracy that Defendants and their Coconspirators, while in the Northern District of Oklahoma and elsewhere, would and did cause wire



transfers of funds from bank accounts in the United States to bank accounts in China designated by Defendant **CHEN**.

59. It was a further part of the conspiracy that Defendants and their Coconspirators would and did obtain significant proceeds, including currency, from smuggling activities.

60. It was a further part of the conspiracy that Defendants and their Coconspirators would and did count, store, and hide the proceeds of their smuggling activities so as to evade detection by law enforcement, and use the proceeds so derived to promote additional smuggling.

61. It was a further part of the conspiracy that Defendants and their Coconspirators would and did use nominee bank account holders to conceal the source of the funds they wired to China.

62. It was a further part of the conspiracy that Defendant **LAM** would and did use Chase Bank account number XXX2936 in the name of Instant Packaging to receive from others cash deposits which were proceeds of previously smuggled merchandise.

63. It was a further part of the conspiracy that Defendant **LAM** would and did use Chase Bank account number XXX2936 in the name of Instant Packaging to wire funds to Defendant **CHEN** and bank accounts she designated in China for payment of smuggled merchandise.

64. It was a further part of the conspiracy that Defendant **DAO** would and did use nominee Chase Bank account number XXX1390, opened by a person known to the



Grand Jury and hereinafter referred to as "Person B", to receive cash deposits derived from the sales of previously smuggled merchandise from China.

65. It was a further part of the conspiracy that Defendant **JOHNSON** would and did deposit cash into various bank accounts, including bank accounts controlled by Defendants **LAM, DAO and LANGEVIN**, to promote smuggling of merchandise into the United States from China.

66. It was a further part of the conspiracy that Defendants **LIEM VU** and **DUC VU** would and did make, and cause to be made, cash deposits into a bank account controlled by Defendant **LAM** to promote smuggling of merchandise into the United States from China.

67. It was a further part of the conspiracy that Defendants **LAM, JOHNSON, LIEM VU, DUC VU** and **PHAM** used text messages to discuss cash deposits as payment for merchandise smuggled into the United States from China.

#### **OVERT ACTS**

68. To effect the objects of the conspiracy and to accomplish its purposes and objectives, Defendants and their Coconspirators committed the following overt acts, among others, in the Northern District of Oklahoma and elsewhere:

69. On or about April 8, 2011, Defendant **TRAN** wired \$33,700 to York Ming Int Enterprise Limited, to pay for merchandise to be smuggled at a later date into the United States from China.

70. On or about April 8, 2011, Defendant **TRAN** wired \$33,000 to Global United Holdings to pay for merchandise, "for 10 kilos of 122" to be smuggled at later date into the United States from China.

71. On or about April 21, 2011, Defendant **TRAN** wired \$69,048.07 to Hong Kong and Shanghai Banking to pay for merchandise, "for Proforma Invoice No. KI110421" to be smuggled at later date into the United States from China.

72. On or about February 1, 2012, Defendant **TRAN** wired \$5,000 to La Venus Massage for the purpose of opening La Venus Massage.

73. On or about February 2, 2012, Defendant **TRAN** received a wire transfer of \$15,000 from Wells Fargo Bank account number XXX8782 in the name of Purity Brokers, LLC, to pay for a "machine".

74. On or about February 3, 2012, Defendant **TRAN** mailed check number 1023 in the amount of \$8,475, drawn on Regions Bank account number XXX7076 in the name of Tim M. Tran, to Palazzo Shopping Center, LLC, to pay for rent of La Venus Massage.

75. On or about February 23, 2012, Defendant **TRAN** mailed check number 1039 in the amount of \$10,000, drawn on Regions Bank account number XXX7076 in the name of Tim M. Tran, to La Venus Massage for the purpose of loaning money to Defendant **DAO**.

76. On or about May 16, 2012, Defendant **TRAN** wired \$23,558 to Hui Zhou Qunde Textiles Co., Ltd, in China to pay for merchandise to be smuggled at a later date into the United States from China.

77. On or about May 17, 2012, \$10,000 in cash was deposited to Bank of Oklahoma ("BOK") account, number XXX2952, the bank account of "Huong Dao DBA La Venus Massage and Spa", an account controlled by Defendant **DAO**.

78. On or about May 17, 2012, Defendant **DAO** wired \$8,723 to Hui Zhou Qunde Textiles Co., Ltd, in China to pay for merchandise to be smuggled at a later date into the United States from China.

79. On or about May 18, 2012, \$49,000 in cash was deposited into Chase Bank account, number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**.

80. On or about May 18, 2012, Defendant **LAM** wired \$50,182 from Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to a bank account in China to pay for merchandise to be smuggled at a later date into the United States from China.

81. On or about May 21, 2012, \$100,000 was transferred between accounts of Purity Brokers, LLC, with a notation that the funds were for "Tim T".

82. On or about May 22, 2012, \$100,000 was wired from Wells Fargo Bank account number XXX8782 in the name of Purity Brokers, LLC, into Chase Bank account



number XXX2936 in the name of Instant Packaging for Defendant **LAM** to pay for merchandise to be smuggled at a later date into the United States from China.

83. On or about May 29, 2012, \$43,003 was wired from Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to a bank account in China to pay for merchandise to be smuggled at a later date into the United States from China.

84. On or about June 28, 2012, Defendant **LAM** deposited \$20,000 in cash into Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**.

85. On or about June 28, 2012, \$16,490 was wired from Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to a bank account in China to pay for merchandise to be smuggled at a later date into the United States from China.

86. On or about July 10, 2012, Defendant **TRAN** wired \$4,365.60 to Zhong Kun in Hong Kong to pay for merchandise to be smuggled at a later date into the United States from China.

87. On or about September 7, 2012, Defendant **LAM** wired \$9,150 from Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to Defendant **CHEN**, through "York Ming & Homedollar Co." to pay for merchandise to be smuggled at a later date into the United States from China.

88. On or about September 7, 2012, Defendants **LAM** and **MINH** used the text messages identified below to discuss where money should be deposited for the benefit of Defendant **LAM**:

<b>Date</b>	<b>Text From</b>	<b>Message</b>
09/07/12	MINH	"Acc #"
09/07/12	LAM	"Chase"
09/07/12	LAM	"Ban Lam"
09/07/12	LAM	"403832202"
09/07/12	MINH	"K"

89. On or about September 17, 2012, Defendant **TRAN** wired \$9,734 to Zhong Kun in Hong Kong to pay for merchandise to be smuggled at a later date into the United States from China.

90. On or about September 17, 2012, \$3,400 in cash was deposited into Bank of America account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**. Defendant **GUNTER** made cash deposits into Defendant **LAM**'s accounts for the purchase of merchandise to be smuggled at a later date into the United States from China.

91. On or about the September 22, 2012, Defendants **LAM** and **LIEM VU** used the text messages identified below to discuss cash deposited as payment for merchandise smuggled into the United States:

Date	Text From	Message
9/22/12	LIEM VU	"Check your bank account right now and text me back"
9/22/12	LAM	"Thanks"
9/22/12	LAM	"How many is that for?"
9/22/12	LIEM VU	"The 3 that came in."
9/22/12	LIEM VU	"The 3 that came in."
9/22/12	LAM	"Ok, thanks"

92. On September 26, 2012, Defendant **LAM** wired \$20,000 from Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to Defendant **CHEN** through "York Ming & Homedollar Co." for the purchase of merchandise to be smuggled at a later date into the United States from China.

93. On or about October 1, 2012, Defendant **TRAN** wired \$10,000 to "York Ming & Ho" in China, for the purchase of merchandise to be smuggled at later date into the United States from China.

94. On or about October 25, 2012, Defendant **LAM** wired \$16,320 from Chase Bank account number XXX2936 in the name of Instant Packaging, a bank account controlled by Defendant **LAM**, to Defendant **CHEN** through "York Ming & Homedollar Co." for the purchase of merchandise to be smuggled at a later date into the United States from China.

95. On or about November 7, 2012, \$15,000 was transferred from Chase Bank account number XXX2202 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**.



96. On or about November 7, 2012, Defendant **LAM** wired \$15,000 from Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to Defendant **CHEN** through "York Ming & Homedollar Co." for the purchase of merchandise to be smuggled at a later date into the United States from China.

97. On November 13, 2012, Defendants **LAM** and **JOHNSON** used text messaging to discuss depositing cash into bank accounts to pay for smuggled merchandise as requested by Defendant **CHEN**:

Date	Text From	Message
11/13/12	LAM	"Have you deposit anything yet?"
11/13/12	JOHNSON	"The other day \$9500"
11/13/12	JOHNSON	"Banks were closed yesterday but putting another \$9500 today"
11/13/12	LAM	"Ok, kool"
11/13/12	LAM	"Thanks, China's asking for money"
11/13/12	JOHNSON	"Anything else coming?"
11/13/12	LAM	"Yes, but no tracking yet"
11/13/12	LAM	"I talked to them last night"
11/13/12	JOHNSON	"Ok"

98. On or about November 15, 2012, Defendant **LAM** wired \$20,000 from Chase Bank account number XXX2936 in the name of Instant Packaging, an account controlled by Defendant **LAM**, to Defendant **CHEN** through "York Ming & Homedollar Co." for the purchase of merchandise to be smuggled at a later date into the United States from China.

99. On or about November 16, 2012, Defendant **DUC VU** deposited and caused to be deposited \$8,000, including \$6,000 in cash, into Instant Packaging's Chase Bank account, number XXX2936, an account controlled by Defendant **LAM**.

100. On or about November 19, 2012, Defendant **DUC VU**, deposited and caused to be deposited \$8,000, including \$5,700 cash, into Instant Packaging's Chase Bank account, number XXX2936, an account controlled by Defendant **LAM**.

101. On or about November 26, 2012, \$9,900 in cash was deposited to Chase Bank account number XXX1390, the bank account opened by Person B and controlled by Defendant **DAO**.

102. On or about December 3, 2012, \$9,900 in cash was deposited to Chase Bank account number XXX1390, the bank account opened by Person B and controlled by Defendant **DAO**.

103. On or about December 5, 2012, Defendant **TRAN** wired \$5,930 to "York Ming & Ho" in China, for the purchase of merchandise to be smuggled at later date into the United States from China.

104. On December 11, 2012, \$9,000 in cash was withdrawn from Chase Bank account number XXX1390, the bank account opened by Person B and controlled by Defendant **DAO**.

105. On or about December 12, 2012, \$9,000 in cash was deposited to Chase Bank nominee account, number XXX6360, the bank account of Defendant **LANDEVIN**.

106. On or about January 4, 2013, Defendant **TRAN** wired \$4,666.66 to a property management business in Tulsa, Oklahoma, to pay for rent of La Venus Massage.

107. On or about January 14, 2013, Defendant **TRAN** wired \$2,000 to La Venus Massage.

108. On or about January 30, 2013, Defendant **TRAN** wired \$2,000 to La Venus Massage to fund employee payroll.

109. On or about February 1, 2013, Defendant **DAO** deposited \$4,400 in cash into Chase Bank nominee account number XXX0570 in the name of and controlled by Defendant **LANGEVIN**.

110. On or about February 1, 2013, \$60,000 was wired from Chase Bank nominee account number XXX0570 in the name of Defendant **LANGEVIN**, an account controlled by Defendant **CHEN**, to pay for merchandise to be smuggled at a later date into the United States from China.

111. From in or about January 2013 through in or about July 2013, Defendant **LANGEVIN** used Bank of America nominee account, number XXX3227, in the name of Denis H. Langevin Sole Prop dba Cuifeng Exports, an account he controlled, to receive approximately \$434,052 in cash deposits to pay for merchandise to be smuggled at a later date into the United States from China.

112. From in or about January 2013 through in or about July 2013, Defendant **LANGEVIN** wired approximately \$421,883 from Bank of Oklahoma nominee account



number XXXX3227 in the name of Denis H. Langevin to Defendant **CHEN** to pay for merchandise to be smuggled at a later date into the United States from China.

All in violation of Title 18, United States Code, Sections 1956(h) and 2.

**FORFEITURE ALLEGATION**  
**[18 U.S.C. §§ 982(a)(2)(B) and 982(a)(1)]**

113. The allegations contained in Counts One through Four of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 982(a)(1).

114. Upon conviction of any of the smuggling and money laundering conspiracies alleged in Counts One through Four of this Superseding Indictment, as part of their sentence, Defendants **TIM MINH TRAN**, a/k/a "Manh Minh Tran", a/k/a "Tim", **BAN LAM**, **JASON ERIC JOHNSON**, a/k/a "Jay", **CHEN CUI FENG**, a/k/a "Helen", **HUONG THI DAO**, a/k/a "Heather", **LIEM THANH VU**, a/k/a "Johnny", **MINH THANH PHAM**, **DUC HUY VU**, a/k/a "Joe", **STANLEY WAYNE GUNTER**, **ARIEL NICOLE ROBINSON DUNN**, and **DENIS HENRI LANGEVIN**, shall forfeit to the United States any property which constitutes or is derived from proceeds obtained directly or indirectly, as a result of such smuggling offenses and any property, real or personal, involved in the money laundering conspiracy, or any property traceable to such property, including but not limited to:

**MONEY JUDGMENT**

A sum of money in an amount representing proceeds of such offenses and property involved in money laundering, for which the defendants shall be jointly and severally liable.

**CURRENCY AND PRECIOUS METALS**

- a. \$79,350 in United States Currency seized from 1345 N. Umbrella, Broken Arrow, Oklahoma, on or about November 20, 2012;

- b. One (1) gold bar seized from 1345 N. Umbrella, Broken Arrow, Oklahoma, on or about November 20, 2012;
- c. One (1) silver bar seized from 1345 N. Umbrella, Broken Arrow, Oklahoma, on or about November 20, 2012;
- d. Approximately \$10,000 in United States Currency;
- e. Approximately \$642,000 in United States Currency; and
- f. \$168,923 seized from Baton Rouge, Louisiana.

#### **PROCEEDS OF FINANCIAL ACCOUNTS**

- a. Proceeds of JPMorgan Chase Bank, N.A., Account #XXXXXXXXXX2202 seized on or about November 20, 2012, in the amount of \$24,458.20;
- b. Proceeds of JPMorgan Chase Bank, N.A., Account #XXXXXXXXXX2936 seized on or about November 20, 2012, in the amount of \$44,783.99;
- c. Proceeds of Wells Fargo Bank, Account # XXXX3893, seized on or about November 20, 2013, in the amount of \$25,695.16; and
- d. Proceeds of Wells Fargo Bank, Account # XXXX3893 seized on or about November 20, 2013, in the amount of \$19,615.03.

#### **REAL PROPERTY WITH ALL BUILDINGS, IMPROVEMENTS AND APPURTENANCES THEREON**

- a. Real property commonly known as 4000 Florida Blvd., Baton Rouge, Baton Rouge Parish, Louisiana, more particularly described as:  
  
Ward 1-3 #9822, Lot: 5, Square: 1, Subdiv: EAST WILSON PLACE.
- b. Real property commonly known as 10390 Mollylea Drive, Baton Rouge, Baton Rouge Parish, Louisiana, more particularly described as:



Ward 1-4 #18998, Lot: 1-A, Subdiv: SHARP, EDWARD R., SR. Tract. Lot A-1 situated in Sec. 86,T7S, R1E, Meas 100 ft. front on the South side of Mollylea Dr. X 320.56 ft. on the East & 93.2 ft. on the rear & 318.1 ft. on the West line. 1955. LESS & EXCEPT .22 acres sold to Darrys Rhett Anderson.

- c. Real property commonly known as 16426 Centurion Avenue, Baton Rouge, Baton Rouge Parish, Louisiana, more particularly described as:

Ward 3-0 #43181, Lot: 149, Subdiv: CENTURION PLACE. 2nd Filing Resub. 1980. 2010 (218-12275).

- d. Real property described as: Ward 1-5 #1502, Lot: 7, Square: 8, Subdiv: NORTH BATON ROUGE. 2010 (193-12265), East Baton Rouge Parrish, Louisiana.
- e. Real property described as: Ward 1-5 #1503, Lot: 2, Square: 8, Subdiv: NORTH BATON ROUGE. 2010 (212-12265), East Baton Rouge Parish, Louisiana.
- f. Real property described as: Ward 1-3 #9819, Lot: 2, Square: 1, Subdiv: EAST WILSON PLACE, East Baton Rouge Parish, Louisiana.
- g. Real property described as: Ward 1-3 #9820, Lot: 3, Square: 1, Subdiv: EAST WILSON PLACE, East Baton Rouge Parish, Louisiana.
- h. Real property described as: Ward 1-3 #9821, Lot: 4, Square: 1, Subdiv: EAST WILSON PLACE, East Baton Rouge Parish, Louisiana.
- i. Real property described as: Ward 1-3 #9823, Lot: 6, Square: 1, Subdiv: EAST WILSON PLACE, East Baton Rouge Parish, Louisiana.
- j. Real property described as: Ward 1-3 #9818, Lot: 1, Square: 1, Subdiv: EAST WILSON PLACE, East Baton Rouge Parish, Louisiana.

- k. Real property described as: Ward 1-5 #1501, Lot: 3, Square: 8, Subdiv: NORTH BATON ROUGE, 2010 (793-12279); 2013 (66-12533), East Baton Rouge Parish, Louisiana.
- l. Real property commonly known as 820 Voorhies Drive, Baton Rouge, East Baton Rouge Parish, Louisiana, more particularly described as:  
  
Ward 1-4 #18970, Lot: 294, Subdiv: WEST SHERWOOD FOREST. 8TH FILING, 2002 (820-11330), East Baton Rouge Parish, Louisiana.
- m. Real Property commonly known as 12003 Newbrook Drive., Houston, Texas, more particularly described as:  
  
Lot Seven (7), Block Sixteen (16), CATALINA SQUARE, SECTION 5, Harris County, Texas.

**AUTOMOBILES:**

- a. One (1) 2009 Honda Accord (Black), VIN 1HGCS22859A003765;
- b. 2007 Mercedes S550, VIN WDDNG71X77A143690;
- c. 2007 Lamborghini Gallardo, VIN ZHWGU22T07LA05322;
- d. 2007 Ferrari 599 GTB FIORANO, VIN ZFFFC60A370153562;
- e. 2004 Case Bobcat with Trailer;
- f. 2011 BMW 550i;
- g. 2009 Mercedes S550, VIN WDDNG86X99A239970;
- h. 2007 Cadillac Escalade;
- i. 2013 Toyota Sienna XLE/Limited, VIN 5TDYK3DC0DS385405;
- j. 2010 Polaris Ranger RZR4, VIN 4XAXH76A6AD085606;
- k. 2009 Trailer, VIN 5VTBU12139RBB5825;

- l. 2013 Haul Mark IND, VIN 16HGB202XDT026882;
- m. 2012 Ford F350 Super Duty, VIN 1FT8W3BT9CEC65727;
- n. 2008 Isuzu NPR; Tilt Cab, VIN JALC4W16587002707;
- o. 2006 International 4000 Series 4200, VIN 1HTMPAFM86H241637;
- p. 2007 Kenworth T2000, VIN 1XKTDU8X57J203341;
- q. 2007 Kenworth T2000, VIN 1XKTDU8X27J203314; and
- r. 2007 Kenworth T2000, VIN 1XKTDU8X17J203353.

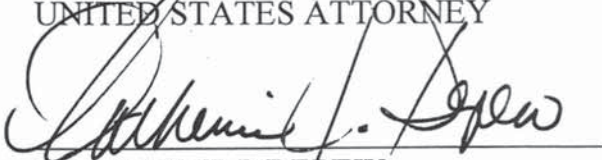
115. Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 18, United States Code, Section 982(b), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially



diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 982(a)(1).

DANNY C. WILLIAMS, SR.  
UNITED STATES ATTORNEY

  
CATHERINE J. DEPEW  
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson  
Grand Jury Foreperson