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CLERK, U.S. DISTRICT COURT
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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.

14 BOONE B. KHOONSRIVONG,
THONGCHONE VONGDENG,
15 DAISY SYSENGRAT,
VUTHIYA TIM,
16 MEGHAN PARADIS,
SEQUOIA VALVERDE,
17 AMBER COLLINS,
SOMALY SIV, and
18 JAFFREY BROWN,

19 Defendants.

CASE NO.

2:15 - CR - 0176 TLN

18 U.S.C. § 1029(b)(2) – Conspiracy to Commit
Access Device Fraud; 18 U.S.C. § 1029(a)(2) – Use
of Unauthorized Access Devices (9 Counts); 18
U.S.C. § 1029(a)(4) – Illegal Possession of Device
Making Equipment; 18 U.S.C. § 1028A(a)(1) –
Aggravated Identity Theft; 18 U.S.C. § 982(a)(2)(B)
and 18 U.S.C. § 1029(c)(1)(C) – Criminal Forfeiture

20 INDICTMENT

21 COUNT ONE: [18 U.S.C. § 1029(b)(2) – Conspiracy To Commit Access Device Fraud]

22 The Grand Jury charges: T H A T

23
24 BOONE B. KHOONSRIVONG,
THONGCHONE VONGDENG,
25 DAISY SYSENGRAT,
VUTHIYA TIM,
26 MEGHAN PARADIS,
SEQUOIA VALVERDE,
27 AMBER COLLINS,
SOMALY SIV, and
28 JAFFREY BROWN,

defendants herein, as follows:

1
2
3 **I. BACKGROUND**

4 At all times relevant to this Indictment:

5 1. Defendants BOONE B. KHOONSRIVONG, AMBER COLLINS, and SOMALY SIV
6 resided in the same house on Princess Avenue in Stockton, California (the "Princess Home").

7 2. Defendants THONGCHONE VONGDENG, SEQUOIA VALVERDE, and JAFFREY
8 BROWN resided in the same house on Portola Court in Stockton, California (the "Portola Home").

9 3. Defendants VUTHIYA TIM and MEGHAN PARADIS resided together in Stockton,
10 California, and other locations.

11 4. Defendant DAISY SYSENGRAT resided in Stockton, California.

12 5. Target, Inc., ("Target") was a public corporation headquartered in Minneapolis,
13 Minnesota, that operated approximately 1,700 retail stores throughout the United States, including in the
14 Eastern District of California.

15 6. In addition to its retail stores, Target also operated an online retail business through
16 which customers could make purchases using a computer or other electronic device capable of accessing
17 the Internet by visiting Target's website Target.com.

18 7. Target also permitted TD Bank USA, N.A. ("TD Bank"), a Delaware corporation, to
19 issue Target-branded credit cards, known as REDcards ("REDCards"), and Target accepted REDcards
20 from customers as payment for goods offered at Target retail outlets or at Target.com.

21 8. Target customers who desired a REDcard could complete an application that required
22 personal identification and financial information, and submit the application using an online interface at
23 Target.com. Once an application was approved, a unique account number associated with only that
24 applicant was assigned and delivered electronically to the customer. Thereafter, that account number
25 was encoded onto a magnetic strip on a REDcard, which was issued to the customer. Customers could
26 use their REDcard account numbers to purchase merchandise from Target by swiping their cards at a
27 Target register or entering their account number to make purchases at Target.com.

28 **II. THE CONSPIRACY**

9. From at least as early as in or about March 2014, up to and including in or about
September 2014, in Sacramento County, State and Eastern District of California and elsewhere, the

1 defendants willfully and knowingly did combine, conspire, confederate, and agree with each other and
2 with others known and unknown to the Grand Jury, to knowingly and with intent to defraud traffic in
3 and use unauthorized access devices, namely, Target REDcard credit card account numbers, to obtain
4 things of value aggregating \$1,000 or more, in and affecting interstate and foreign commerce, in
5 violation of Title 18, United States Code, Sections 1029(a)(2) and (b)(2).

6 **III. OBJECT OF THE CONSPIRACY**

7 10. It was the object of the conspiracy to use and traffic in unauthorized access devices for
8 the purpose of financial gain by, among other means, making fraudulent Target REDcards with
9 fraudulently obtained credit card account numbers and then using those fraudulent Target REDcards to
10 purchase electronic equipment, pre-paid gift cards, and other things of value at Target stores located in
11 the Eastern District of California and elsewhere.

12 **IV. MANNER AND MEANS**

13 In furtherance of the conspiracy, the defendants and their co-conspirators employed the
14 following ways and means, among others:

15 11. The defendants and their co-conspirators fraudulently acquired valid REDcard account
16 numbers by stealing victims' personal identification information and using that information to complete
17 and submit electronic applications to open REDcard accounts. The defendants then caused those
18 fraudulent REDcard account numbers to be delivered to a member of the conspiracy.

19 12. The defendants and their co-conspirators fraudulently acquired additional valid REDcard
20 account numbers by, among other means, generating a list of additional potential REDcard account
21 numbers.

22 13. The defendants and their co-conspirators then used the REDcard account numbers, credit
23 card device making equipment, and blank or altered cards with magnetic stripes to make fraudulent
24 REDcards with magnetic stripes encoded with authentic Target REDcard account numbers.

25 14. To avoid detection at the point of sale, the defendants and their co-conspirators also
26 encoded the magnetic stripes of the fraudulent REDcards they created with: (i) false account holder
27 names, including their own names or aliases; (ii) an empty value or forward-slash; or (iii) other
28 anonymizing entries, such as "Valued Customer," "Customer Valued," "Redcard," and "Gift Recipient."

1 15. The defendants and their co-conspirators then used the fraudulent REDcards to purchase
2 merchandise, including electronic equipment, pre-paid gift cards, and other items at Target stores.

3 16. To make the in-store purchases, the defendants and their coconspirators would travel to
4 Target stores individually or in small groups. In some cases, the defendants and their co-conspirators
5 used fraudulent REDcards at the same Target stores within minutes of one another – sometimes using
6 the same registers – and exited those stores together or separately within minutes of one another.

7 17. To test whether a fraudulent REDcard would be accepted at the point of sale, the
8 defendants and their co-conspirators sometimes conducted test-purchases of low-cost merchandise. If
9 the fraudulent REDcard was accepted, the conspirators used it again in the same and other Target stores
10 to make more expensive purchases.

11 18. On various occasions during the conspiracy, the defendants and their co-conspirators
12 attempted unsuccessfully to use one or more invalid or declined fraudulent REDcards to make
13 purchases before they successfully completed those transactions with other fraudulent REDcards linked
14 to valid account numbers.

15 19. The defendants and their co-conspirators would also recycle some of the pre-paid gift
16 cards they had purchased and used earlier in the conspiracy by encoding the magnetic stripe on the used
17 gift cards with fraudulently obtained Target REDcard account numbers. This would convert the used
18 gift cards into unauthorized access devices, which the defendants and their co-conspirators then used to
19 make additional fraudulent purchases.

20 20. The defendants and their co-conspirators created and trafficked in fraudulent REDcards
21 in the Princess Home and the Portola Home (together the “Princess and Portola Homes”). They also
22 stored in the Princess and Portola Homes dozens of unauthorized access devices, including REDcard
23 account numbers, as well as a variety of credit cards that were in the process of being converted into
24 unauthorized access devices.

25 21. The defendants and their co-conspirators also maintained, accessed, and possessed in the
26 Princess and Portola Homes stolen mail, device-making equipment, receipts from fraudulent purchases,
27 and merchandise obtained by their fraud.

28 22. In addition to Target credit card account information, the defendants and their co-

1 conspirators maintained a collection of personal identification information in the Princess and Portola
2 Homes. This information included earning statements, credit scores, driver licenses and Department of
3 Motor Vehicle documents, Social Security numbers, and taxpayers' Internal Revenue Service filings, as
4 well as credit, debit, and bank account information belonging to unknowing victims.

5 23. Between in or about March 2014 and in or about September 2014, the defendants
6 completed more than 300 successful transactions using fraudulent REDcards. In all, over 300
7 unauthorized access devices were possessed, used, procured, and trafficked by members of the
8 conspiracy in furtherance of the conspiracy. Over approximately 1,000 victims have been identified to
9 date as having had their identities compromised as a result of the conspiracy.

10 V. OVERT ACTS

11 In furtherance of the conspiracy and in order to accomplish its objects, defendants committed the
12 following acts in the Eastern District of California and elsewhere, among others:

13 24. On or about March 19, 2014, at approximately 7:07pm, at a Target store in Lodi,
14 BOONE B. KHOONSRIVONG used an unauthorized access device in the form of REDcard account
15 number xxxxxx8962, belonging to victim P.Y., to make a test purchase in the amount of approximately
16 \$3.07. On the same date, at approximately 7:16pm, BOONE B. KHOONSRIVONG used the same
17 unauthorized access device in the same Target store to make purchases totaling approximately \$256.49.
18 The name encoded on the magnetic stripe of the unauthorized access device BOONE B.
19 KHOONSRIVONG used during that transaction was "Rap Chameroun."

20 25. On or about March 23, 2014, at approximately 4:33pm, at a Target store in Manteca,
21 SEQUOIA VALVERDE used an unauthorized access device in the form of REDcard account number
22 xxxxxx5656, belonging to victim R.G., to make a test purchase in the amount of approximately \$1.75.
23 On the same date, at approximately 5:39pm, SEQUOIA VALVERDE used the same unauthorized
24 access device in the same Target store to make purchases totaling approximately \$474.12. After
25 completing those purchases, SEQUOIA VALVERDE exited that Target store with BOONE B.
26 KHOONSRIVONG. The name encoded on the magnetic stripe of the unauthorized access device
27 SEQUOIA VALVERDE used that day was "Amber Collins."

28 26. On or about March 25, 2014, at approximately 9:49am, at a Target store in El Dorado

1 Hills, MEGHAN PARADIS used an unauthorized access device in the form of REDcard account
2 number xxxxxx7222, belonging to victim M.T., to make purchases totaling approximately \$422.74.
3 During the transaction, VUTHIYA TIM stood at the register with MEGHAN PARADIS, and the two
4 exited that Target store together. The name programmed on the magnetic stripe of the unauthorized
5 access device MEGHAN PARADIS used that day was "Meghan Paridis."

6 27. On or about March 25, 2014, at approximately 9:57am, at a Target store in El Dorado
7 Hills, VUTHIYA TIM used an unauthorized access device in the form of REDcard account number
8 xxxxxx7222, belonging to victim M.T., to make purchases totaling approximately \$247.72. The name
9 programmed on the magnetic stripe of the unauthorized access device VUTHIYA TIM used that day
10 was "Meghan Paridis."

11 28. On or about March 27, 2014, at approximately 8:13am, at a Target store in Modesto, an
12 unauthorized access device in the form of REDcard account number xxxxxx6633, belonging to victim
13 S.G., was used to make a test purchase in the amount of approximately \$4.15. On the same date, at
14 approximately 8:27am, BOONE B. KHOONSRIVONG used the same unauthorized access device in the
15 same Target store to make purchases totaling approximately \$331.66. The name encoded on the
16 magnetic stripe of the unauthorized access device BOONE B. KHOONSRIVONG used during that
17 transaction was "Boone Khoonsrivong."

18 29. On or about March 27, 2014, at approximately 9:17am, at a Target store in Modesto,
19 BOONE B. KHOONSRIVONG used an unauthorized access device in the form of REDcard account
20 number xxxxxx8989, belonging to victim N.J., to make purchases totaling approximately \$481.82. The
21 name encoded on the magnetic stripe of the unauthorized access device BOONE B. KHOONSRIVONG
22 used during that transaction was "Dalee Chameroun."

23 30. On or about March 27, 2014, at approximately 8:16am, at a Target store in Modesto,
24 AMBER COLLINS used an unauthorized access device in the form of REDcard account number
25 xxxxxx8855, belonging to victim S.C., to make a test purchase in the amount of approximately \$5.16.
26 On the same date, at approximately 8:37am, AMBER COLLINS used the same unauthorized access
27 device in the same Target store to make purchases totaling approximately \$305.38. The name encoded
28 on the magnetic stripe of the unauthorized access device AMBER COLLINS used that day was "Amber

1 Cunningham.” On the same date, almost one hour later at approximately 9:18am, AMBER COLLINS
2 used the same unauthorized access device at another Target store, also in Modesto, to make purchases
3 totaling approximately \$471.49.

4 31. On or about April 1, 2014, at approximately 3:23pm, at a Target store in Stockton,
5 BOONE B. KHOONSRIVONG used an unauthorized access device in the form of REDcard account
6 number xxxxxx8282, belonging to victim D.S., to make purchases totaling approximately \$718.97. The
7 name encoded on the magnetic stripe of the unauthorized access device BOONE B. KHOONSRIVONG
8 used that day was “Bryan Oum.”

9 32. On or about May 23, 2014, at approximately 7:37pm, at a Target store in Stockton,
10 DAISY SYSENGRAT used an unauthorized access device in the form of REDcard account number
11 xxxxxx7710, belonging to victim K.P., to make purchases totaling approximately \$414.23. The name
12 encoded on the magnetic stripe of the unauthorized access device DAISY SYSENGRAT used that day
13 was “Sysen Donna.”

14 33. On or about June 26, 2014, at approximately 5:04pm, at a Target store in Lodi,
15 THONGCHONE VONGDENG used an unauthorized access device in the form of REDcard account
16 number xxxxxx3774, belonging to victim L.Z., to make purchases totaling approximately \$66.78. The
17 name programmed on the magnetic stripe of the unauthorized access device THONGCHONE
18 VONGDENG used that day was “Tim Vuthiya.”

19 34. On or about June 26, 2014, at approximately 5:05pm, at a Target store in Lodi,
20 VUTHIYA TIM used an unauthorized access device in the form of REDcard account number
21 xxxxxx8377, belonging to victim S.H., to make purchases totaling approximately \$145.99. The name
22 programmed on the magnetic stripe of the unauthorized access device VUTHIYA TIM used that day
23 was “Tim Vuthiya.”

24 35. On or about June 26, 2014, at approximately 5:14pm, at a Target store in Lodi,
25 MEGHAN PARADIS used an unauthorized access device in the form of REDcard account number
26 xxxxxx8431, belonging to victim P.P., to make purchases totaling approximately \$173.17. The name
27 programmed on the magnetic stripe of the unauthorized access device MEGHAN PARADIS used that
28 day was “Customer Valued.”

1 36. On or about July 10, 2014, between at approximately 10:01pm and 10:04pm, at a Target
2 store in Lodi, SEQUOIA VALVERDE used an unauthorized access device in the form of REDcard
3 account number xxxxxx5557, belonging to victim P.C., to make three successive purchases totaling
4 approximately \$345.07. During the purchases, DAISY SYSENGRAT stood at the register with
5 SEQUOIA VALVERDE and the two exited that Target store together. The name encoded on the
6 magnetic stripe of the unauthorized access device SEQUOIA VALVERDE used that day was "Gift
7 Recipient."

8 37. On or about July 18, 2014, between approximately 2:43pm and approximately 7:27pm, at
9 two separate Target stores in Dublin, California, JAFFREY BROWN used five different unauthorized
10 access devices in the form of REDcard account numbers, xxxxxx9223, xxxxxx9614, xxxxxx3322,
11 xxxxxx5514, and xxxxxx3551, belonging, respectively, to victims A.C., K.S., W.A., A.O., D.G., for
12 purchases totaling approximately \$438. During the purchases at approximately 5:51pm,
13 THONGCHONE VONGDENG stood at the register with JAFFREY BROWN, and the two exited both
14 Target stores together. The name encoded on the magnetic stripes of each of the five unauthorized
15 access devices JAFFREY BROWN used that day was "Customer Value."

16 38. On or about July 28, 2014, at approximately 3:09pm, at a Target store in Lodi, AMBER
17 COLLINS used an unauthorized access device in the form of REDcard account number xxxxxx0156,
18 belonging to victim M.F., to make purchases in the amount of approximately \$487.03. The name
19 programmed on the magnetic stripe of the unauthorized access device AMBER COLLINS used that day
20 was "Misty McAfee."

21 39. On or about August 8, 2014, at approximately 2:08pm, at a Target store in San Jose,
22 California, SEQUOIA VALVERDE used an unauthorized access device in the form of REDcard
23 account number xxxxxx1937, belonging to victim G.G., to make purchases in the amount of
24 approximately \$420.36.

25 40. On or about August 9, 2014, at approximately 6:36pm, at a Target store in Lathrop,
26 SOMALY SIV used an unauthorized access device in the form of REDcard account number
27 xxxxxx0342, belonging to victim J.S., to make purchases totaling approximately \$566.93. During the
28 transaction, DAISY SYSENGRAT stood at the register with SOMALY SIV and attempted to pay for

1 the transaction by swiping a card that was declined. Thereafter, SOMALY SIV completed the
2 transaction and the two exited that Target store together. The name encoded on the magnetic stripe of
3 the unauthorized access device SOMALY SIV used that day was "Gift Recipient."

4 41. On or about August 24, 2014, SOMALY SIV sent to SEQUOIA VALVERDE two text
5 messages to which were attached two separate photographs of collections of REDcard account numbers.

6 42. On or about August 28, 2014, BOONE B. KHOONSRIVONG possessed at the Princess
7 Home access device-making equipment.

8 43. On or about August 28, 2014, BOONE B. KHOONSRIVONG possessed at the Princess
9 Home unauthorized access devices in the form of REDcard account numbers associated with valid
10 victim information encoded onto the magnetic stripes of altered cards.

11 44. On or about August 28, 2014, BOONE B. KHOONSRIVONG possessed at the Princess
12 Home pages of REDcard account numbers.

13 45. On or about August 28, 2014, SEQUOIA VALVERDE possessed at the Portola Home
14 approximately twenty prepaid Target gift cards.

15 46. On or about August 28, 2014, SEQUOIA VALVERDE possessed at the Portola Home
16 blank credit cards with magnetic stripes.

17 All in violation of Title 18, United States Code, Section 1029(b)(2).

18 COUNTS TWO THROUGH TEN: [18 U.S.C. § 1029(a)(2) – Use of Unauthorized Access Devices]

19 The Grand Jury further charges: T H A T

20 BOONE B. KHOONSRIVONG,
21 THONGCHONE VONGDENG,
22 DAISY SYSENGRAT,
23 VUTHIYA TIM,
24 MEGHAN PARADIS,
SEQUOIA VALVERDE,
AMBER COLLINS,
SOMALY SIV, and
JAFFREY BROWN,

25 defendants herein, on or about the dates set forth below, in the State and Eastern District of California,
26 knowingly and with intent to defraud, used unauthorized access devices in the form of Target store
27 account numbers obtained with intent to defraud, and by such conduct, from in or about March 2014,
28 through in or about August 2014, each obtained things of value aggregating \$1,000 or more during that

period, as enumerated below, with said use affecting interstate and foreign commerce:

Count	Date(s)	Defendant	Target Account Numbers (Amounts)	Approximate Aggregate Value of Goods Obtained	Location(s)
2	3/22/2014	BOONE B. KHOONSRIVONG	xxxxxxx9608 (\$390.38)	\$1,210.67	Lodi
	4/1/2014		xxxxxxx8282 (\$506.97)		Stockton
	7/15/2014		xxxxxxx8498 (\$313.32)		Lodi
3	6/23/2014	THONGCHONE VONGDENG	xxxxxxx8865 (\$113.16)	\$1,005.24	Lodi
	6/26/2014		xxxxxxx3774 (\$66.78)		Lodi
	7/24/2014		xxxxxxx8637 (\$109.16)		Lathrop
	7/24/2014		xxxxxxx8580 (\$69.83)		Lathrop
	7/29/2014		xxxxxxx4499 (\$90.24)		Stockton
	8/4/2014		xxxxxxx9938 (\$556.07)		Modesto
4	5/23/2014	DAISY SYSENGRAT	xxxxxxx7710 (\$414.23)	\$1,270.82	Stockton
	7/14/2014		xxxxxxx0598 (\$444.31)		Lodi
	8/21/2014		xxxxxxx5565 (\$412.28)		Lathrop
5	3/25/2014	VUTHIYA TIM	xxxxxxx7222 (\$247.72)	\$1,058.42	El Dorado Hills
	3/26/2014		xxxxxxx7222 (\$229.46)		Stockton
	6/26/2014		xxxxxxx8377 (\$145.99)		Lodi
	7/3/2014		xxxxxxx7753 (\$113.16)		Lodi
	7/25/2014		xxxxxxx9548 (\$216.09)		Elk Grove
	7/26/2014		xxxxxxx6859 (\$106.00)		Davis
6	3/24/2014	MEGHAN PARADIS	xxxxxxx6315 (\$460.61)	\$1,070.63	Stockton
	3/25/2014		xxxxxxx7222 (\$422.74)		El Dorado Hills
	7/3/2014		xxxxxxx3774 (\$187.28)		Lodi
7	3/23/2014	SEQUOIA VALVERDE	xxxxxxx5656 (\$474.12)	\$1,068.75	Manteca
	7/10/2014		xxxxxxx5557 (\$163.21)		Lodi

	7/13/2014		xxxxxx5727 (\$189.40)		Lathrop
	7/17/2014		xxxxxx6976 (\$242.02)		Lathrop
8	7/28/2014	AMBER COLLINS	xxxxxx0156 (\$487.03)	\$1,004.10	Lodi
	7/28/2014		xxxxxx5999 (\$42.01)		Lathrop
	7/30/2014		xxxxxx5999 (\$42.56)		Tracy
	8/12/2014		xxxxxx2046 (\$246.24)		Lathrop
	8/12/2014		xxxxxx5046 (\$186.26)		Lathrop
9	8/5/2014	SOMALY SIV	xxxxxx9650 (\$286.61)	\$1,292.10	Stockton
	8/6/2014		xxxxxx7805 (\$544.06)		Modesto
	8/6/2014		xxxxxx9814 (\$461.43)		Modesto
10	3/19/2014	JAFFREY BROWN	xxxxxx6351 (\$365.25)	\$1,282.37	Stockton
	3/19/2014		xxxxxx5132 (\$405.86)		Lodi
	3/23/2014		xxxxxx8423 (\$511.26)		Stockton

in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT ELEVEN: [18 U.S.C. § 1029(a)(4) – Illegal Possession of Device-Making Equipment]

The Grand Jury further charges: THAT

BOONE B. KHOONSRIVONG,

defendant herein, on or about August 28, 2014, in the State and Eastern District of California, knowingly and with intent to defraud, had control and custody of and possessed certain “device-making equipment” designed and primarily used for making an access device or counterfeit access device, to wit: an MSR 606 magnetic stripe card reader/writer, with said control, custody, and possession affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(4).

COUNT TWELVE: [18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft]

The Grand Jury further charges: THAT

BOONE B. KHOONSRIVONG,

defendant herein, on or about August 19, 2014, through August 26, 2014, in the State and Eastern District of California, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name, date of birth, social security number, and an access

1 device account number of a real person, E.T., to commit a felony violation enumerated in 18 U.S.C. §
2 1028A(c), to wit 18 U.S.C. § 1029(a)(2), knowing that the means of identification belonged to another
3 actual person, all in violation of Title 18, United States Code, Section 1028A(a)(1).

4 FORFEITURE ALLEGATION: [18 U.S.C. § 982(a)(2)(B) and 18 U.S.C. § 1029(c)(1)(C) – Criminal
5 Forfeiture]

6 1. Upon conviction of one or more of the offenses alleged in Counts One through Eleven of
7 this Indictment, defendants BOONE B. KHOONSRIVONG, THONGCHONE VONGDENG, DAISY
8 SYSENGRAT, VUTHIYA TIM, MEGHAN PARADIS, SEQUOIA VALVERDE, AMBER COLLINS,
9 SOMALY SIV, and JAFFREY BROWN shall forfeit to the United States, pursuant to 18 U.S.C. §
10 982(a)(2)(B), any property constituting or derived from proceeds obtained directly or indirectly, as a
11 result of said violations, including but not limited to the following:

12 a. A sum of money equal to the amount of proceeds obtained directly or indirectly, as a
13 result of such offenses, for which defendants are convicted.

14 2. Upon conviction of one or more of the offenses alleged in Counts One through Eleven of
15 this Indictment, defendants BOONE B. KHOONSRIVONG, THONGCHONE VONGDENG, DAISY
16 SYSENGRAT, VUTHIYA TIM, MEGHAN PARADIS, SEQUOIA VALVERDE, AMBER COLLINS,
17 SOMALY SIV, and JAFFREY BROWN shall forfeit to the United States, pursuant to 18 U.S.C. §
18 1029(c)(1)(C), any personal property used or intended to be used to commit the offenses, including but
19 not limited to:

- 20 a. Metro PCS/Huawei Model M931 cellular phone, black with a cracked screen,
21 serial number: F4G29D1342417146;
- 22 b. Acer Chromebook computer, serial number: nxsheaa002416002597600;
- 23 c. Kyocera cellular phone, serial number: v65c5133;
- 24 d. Samsung cellular phone, serial number: r31d20evfde;
- 25 e. AT&T cellular phone, serial number: 327b414247a;
- 26 f. Samsung galaxy cellular phone, serial number: r38f206jr1e
- 27 g. iPad tablet computer, serial number: dlxm7mcfk11;
- 28 h. Acer laptop computer, serial number: nxm2haa007236006e0160;1

- i. Dell laptop computer, serial number: 13661154469;
- j. Epson printer, serial number: sn5y092386;
- k. Samsung printer, serial number: zevpb8kf4c00qsf;
- l. Credit card reader/writer MSR606 (serial number not visible);
- m. iPhone cellular phone, model a1533, serial number: imei013988002936855;
- n. Lenovo computer, serial number cp22490519;
- o. Asus computer, serial number: esn0bc225782227;
- p. iPhone cellular phone, serial number: bcge2642a;
- q. HP all in one personal computer, serial number: 3cr3430fd8;
- r. Samsung tablet computer, serial number: r52f6022tdf;
- s. iPhone cellular phone, black, serial number: bcga1241;
- t. Acer computer, serial number: nxmnzaa0044200312b3400;
- u. iPad tablet computer, serial number: f4qmvb6zflmq; LG tablet znfv410;
- v. Samsung galaxy S5 cellular phone, serial number: r38f40yxmkr;
- w. Nokia phone, serial number 353045061498448;
- x. Samsung tablet computer, rf2f210rvry;
- y. Acer computer, serial number: nxmkeaa001416036ff7600;
- z. HP laptop computer, serial number: cnu63326pn;
- aa. iPod touch device, serial number: ccqn3ac7fmjf;
- bb. iPod device, serial number: ccqmx2dxfmjf;
- cc. Lexmark printer/copier, serial number: 15450911645;
- dd. iPhone 4 cellular phone, white and cracked on front and back, with a white and pink case, serial number not recorded;
- ee. iPhone cellular phone with cracked back plate and Mophie battery pack, serial number not recorded;
- ff. Numerous credit cards, gift cards, access devices and financial and personal documents belonging to others and used in the scheme to defraud;

1 gg. The value, i.e., balance of funds, in each of the seized pre-paid gift cards debit
2 cards.

3 3. If any property subject to forfeiture as a result of the offenses alleged in Counts One
4 through Eleven of this Indictment, for which defendants are convicted:

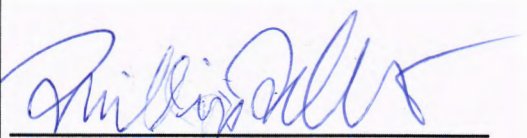
- 5 a. cannot be located upon the exercise of due diligence;
6 b. has been transferred or sold to, or deposited with, a third party;
7 c. has been placed beyond the jurisdiction of the court;
8 d. has been substantially diminished in value; or
9 e. has been commingled with other property which cannot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

11 it is the intent of the United States, pursuant to 18 U.S.C. §§ 982(b)(1) and 1029(c)(1)(C)(2),
12 incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants, up to the
13 value of the property subject to forfeiture.

14 A TRUE BILL.

15
16 **/s/ Signature on file w/AUSA**

17 FOREPERSON

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19 BENJAMIN B. WAGNER
20 United States Attorney
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