

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.  
2019 JAN 28 P 1:41  
WILLIAM W. BLEVINS  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR HARBORING  
ALIENS AND UNLAWFUL EMPLOYMENT OF ALIENS

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

19-00009

v.

\*

SECTION:

SECT. 7 MAG. 1

THAI THAI, LLC.

\*

VIOLATION(s): 8 U.S.C. § 1324(a)(1)(A)(iii)

d/b/a Sticky Rice Thai Cuisine

8 U.S.C. § 1324a(a)(1)(A)

SOMPHON CHIWABANDIT

\*

\* \* \*

The United States Attorney charges that:

COUNT 1

Beginning not later than on or about May 3, 2018, and continuing until on or about December 6, 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **THAI THAI, LLC., d/b/a Sticky Rice Thai Cuisine**, knowing and in reckless disregard of the fact that aliens, namely, two employees at the restaurant in Covington, Louisiana, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection such aliens, all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

X Fee USA \_\_\_\_\_  
Process \_\_\_\_\_  
X Dkt \_\_\_\_\_  
CIRmDep \_\_\_\_\_  
Doc. No. \_\_\_\_\_

**COUNT 2**

Beginning not later than on or about May 3, 2018, and continuing until on or about December 6, 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **SOMPHON CHIWABANDIT**, knowingly hired and recruited for employment in Covington, Louisiana, two unauthorized aliens, who at the time were not lawfully admitted for permanent residence or who were not authorized to be so employed by the Immigration and Naturalization Act or the Attorney General, all in violation of Title 8, United States Code, Section 1324a(a)(1)(A).

**NOTICE OF FORFEITURE**

1. The allegations of Count 1 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Section 982(a)(6).

2. As a result of the offense alleged in Count 1, defendant, **THAI THAI, LLC. d/b/a Sticky Rice Thai Cuisine**, shall forfeit to the United States, all conveyances used in the commission of the violation, all property, real and/or personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offenses, and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate the commission of the offenses, including but not limited to:

- a. \$24,640 in United States Currency and all interest and proceeds traceable thereto.

The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

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

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendant.

All in violation of Title 18, United States Code, Section 982(a)(6).

PETER G. STRASSER  
UNITED STATES ATTORNEY



JON MAESTRI  
Assistant United States Attorney

New Orleans, Louisiana  
January 28, 2019