

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA

2020 AUG 25 P 2:23

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CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR MAKING FALSE
DECLARATION AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

20-00082

v.

*

SECTION:

SECT. T MAG. 2

PENH KANG

*

VIOLATION: 18 U.S.C. § 152(3)

* * *

The United States Attorney charges that:

COUNT 1

On or about the 12th day of September 2017, in the Eastern District of Louisiana, **PENH KANG**, defendant herein, knowingly and fraudulently made a material false declaration, certificate and verification under the penalty of perjury, as permitted under Section 1746 of Title 28, in and in relation to a case under Title 11, *In re Pehn Kang*, No.17-12431, by submitting Schedules of Assets and Liabilities and a Statement of Financial Affairs, in which the defendant fraudulently answered questions 15 in part 6, 20 in part 8, and 31 in part 4, in that **KANG** failed to disclose gambling losses of approximately \$40,000 to \$60,000, an interest in two Capital One Bank accounts, and a \$50,000 life insurance policy.

All in violation of Title 18, United States Code, Section 152(3).

K Fee USA
Process _____
Dktd _____
ClRmDep _____
Doc. No. _____

NOTICE OF FORFEITURE

1. The allegations of Count 1 are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

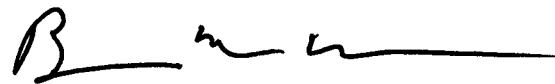
2. As a result of the offenses alleged in Count 1, defendant, **PENH KANG**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offense.

3. If any of the above-described property, 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, 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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

PETER G. STRASSER
UNITED STATES ATTORNEY



BRIAN M. KLEBBA
Assistant United States Attorney

New Orleans, Louisiana
August 25, 2020