

**SEALED**

**ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U.S. DISTRICT COURT.  
NORTHERN DISTRICT OF TEXAS  
**FILED**  
AUG 16 2016  
CLERK, U.S. DISTRICT COURT  
By \_\_\_\_\_ Deputy

UNITED STATES OF AMERICA

v.

ALLEN NASH, a.k.a. "A-1" (01)  
CONNIE SU MOSER, a.k.a. "VIVIAN,"  
a.k.a. SONG YE HONG" (02)  
KUM SHUGARS (03)

**FILED UNDER SEAL** Deputy

NO. 3:15-CR-478 -B  
(Supersedes Indictment Filed on October 21,  
2015)

SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One  
Sex Trafficking of Children  
(Violation of 18 U.S.C. § 1591(a) and (b)(2))

From on or about October 4, 2014 through on or about October 7, 2014, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Allen Nash, a.k.a "A-1,"** knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained and maintained by any means, and benefitted, financially and by receiving anything of value, from participating in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained, Jane Doe, who had not attained the age of 18 years, knowing or in reckless disregard of the fact that Jane Doe had not attained the age of 18 years and that Jane Doe would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. § 1591(a) and (b)(2).

Count Two

Transportation of a Minor to Engage in Commercial Sex Acts  
(Violation of 18 U.S.C. § 2423(a))

From on or about October 4, 2014 through on or about October 7, 2014, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Allen Nash, a.k.a "A-1,"** knowingly transported, in interstate commerce from Texas to Louisiana, Jane Doe, who had not attained the age of 18 years, knowing or in reckless disregard of the fact that Jane Doe had not attained the age of 18 years and intending that Jane Doe would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. § 2423(a).

Count Three  
Felon in Possession of Ammunition  
(18 U.S.C. §§ 922(g)(1) and § 924(e))

From on or about October 4, 2014 through on or about October 7, 2014, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Allen Nash, a.k.a “A-1,”** having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate and foreign commerce ammunition, to wit: four rounds of 9 millimeter Federal Premium 135 grain ammunition.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(e).

Count Four  
Sex Trafficking Through Force, Fraud or Coercion  
(Violation of 18 U.S.C. § 1591(a) and (b)(1))

From on or about April 1, 2014 through on or about January 1, 2015, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Allen Nash, a.k.a "A-1,"** knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, victim R.J., knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause victim R.J. to engage in a commercial sex act.

In violation of 18 U.S.C. § 1591(a) and (b)(1).

Count Five  
Conspiracy to Commit Sex Trafficking  
(Violation of 18 U.S.C. §1594(c))

From on or about April 1, 2014 through on or about December 9, 2014, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Allen Nash, a.k.a “A-1,”** and **Connie Su Moser, a.k.a. “Vivian,” a.k.a. “Song Ye Hong”** knowingly entered into an agreement to recruit, entice, harbor, transport, provide, obtain and maintain by any means, in an affecting interstate commerce, victim R.J., knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause victim R.J. to engage in a commercial sex act, and **Allen Nash, a.k.a “A-1,”** and **Connie Su Moser, a.k.a. “Vivian,” a.k.a. “Song Ye Hong”** knew of the unlawful purpose of the agreement, and they joined into the agreement willfully, that is, with the intent to further its unlawful purpose.

In violation of 18 U.S.C. §1594(c).

Count Six

Use of a Facility of Interstate Commerce in Aid of a Racketeering Enterprise  
(Violation of 18 U.S.C. §§ 1952(a)(3) and (A))

From on or about June 1, 2012 through on or about March 1, 2015, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Connie Su Moser, a.k.a. "Vivian," a.k.a. "Song Ye Hong"** and **Kum Shugars** used facilities of interstate commerce, namely cellular phones and the internet among others, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is a business enterprise involving prostitution in violation of Texas Penal Code Sec. 43.02, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

In violation of 18 U.S.C. §§ 1952(a)(3) and (A).

Forfeiture Notice  
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

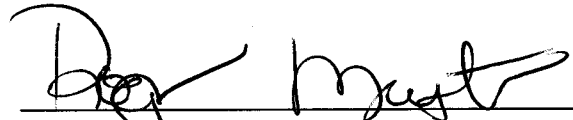
Upon conviction for the offenses alleged in Counts One, Four and Five of this Superseding Indictment and pursuant to 18 U.S.C. § 1594(d), defendants **Allen Nash a.k.a. "A-1"** and **Connie Su Moser, a.k.a. "Vivian," a.k.a. "Song Ye Hong"** shall forfeit to the United States any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations and any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violations.

Upon conviction for the offense alleged in Count Three of this Indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the defendant, **Allen Nash a.k.a. "A-1,"** shall forfeit to the United States of America, all ammunition involved or used in the respective offense.

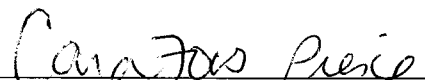
The above-referenced property includes, but is not limited to, the following:

1. Four rounds of 9 millimeter Federal Premium 135 grain ammunition

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

JOHN R. PARKER  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
CARA FOOS PIERCE  
Assistant United States Attorney  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

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A.K.A. SONG YE HONG" (02)  
KUM SHUGARS (3)

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SEALED SUPERSEDING INDICTMENT

18 U.S.C. § 1591(a) and (b)(2)  
Sex Trafficking of Children

18 U.S.C. § 2423(a)  
Transportation of a Minor to Engage in Commercial Sex Acts

18 U.S.C. §§ 922(g)(1) and § 924(e)  
Felon in Possession of Ammunition

18 U.S.C. § 1591(a) and (b)(1)  
Sex Trafficking Through Force, Fraud or Coercion

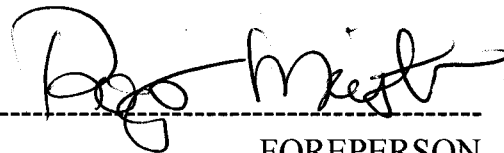
18 U.S.C. §1594(c)  
Conspiracy to Commit Sex Trafficking

18 U.S.C. §§ 1952(a)(3) and (A)  
Use of a Facility of Interstate Commerce in Aid of a Racketeering Enterprise

18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)  
Forfeiture Notice

6 Counts

A true bill rendered



DALLAS

FOREPERSON

Filed in open court this 16th day of August, 2016.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE

Criminal Case Pending: 3:15-CR-478-B