

FILED
Apr 09 2021
4:08 pm
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/soniad DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

November 2019 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,

v.

TRI MINH VO, (1),
TIEN HONG HONG LE (2),
aka "Mr. Le,"
DONG VAN NGUYEN (3),
DANG VAN NGUYEN (4),
MICHELLE SALVADORE EDWARDS (5),
KHANG DINH NGUYEN (6),
aka "K-Y,"
LEETRI DANG (7),
KE VAN TRAN (8),
aka "Kevin,"
KIARA PORSHA EASLEY (9),
TO VAN LAI (10),
aka "Took,"
CU VAN HUYN (11),
aka "Cucu,"
DAPHNE NICOLE RIVERA (12),
WILLIAM VANNA BOUNSAVATH (13),
aka "Ray Ray,"
ALMA SOCORRO SILVA (14),
TONY NGUYEN (15),
aka "Lucky,"

Defendants.

Case No. 21 CR1111H

I N D I C T M E N T

Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 18, U.S.C.,
Sec. 1955 - Illegal Gambling
Business; Title 21, U.S.C.,
Sec. 856(a)(1) - Maintaining a
Drug-Involved Premises; Title 21,
U.S.C., Sec. 841(a)(1) - Possession
of Methamphetamine with Intent
Distribute; Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting;
Title 18, U.S.C., Secs. 924(d) and
981(a)(1)(C), Title 21, U.S.C.,
Section 853, Title 18, U.S.C.,
Secs. 981(a)(1)(C) and 1955(d),
and Title 28, U.S.C.,
Sec. 2461(c) - Criminal Forfeiture

1 The grand jury charges:

2 Count 1

3 CONSPIRACY

4 [18 U.S.C. § 371]

5 1. Beginning at a date unknown to the grand jury and continuing
6 up to on or about the date of this Indictment, within the Southern
7 District of California, and elsewhere, defendants TRI MINH VO, TIEN HONG
8 HOMG LE, aka "Mr. Le", DONG VAN NGUYEN, DANG VAN NGUYEN, MICHELLE
9 SALVADORE EDWARDS, KHANG DINH NGUYEN, aka "K-Y", LEETRI DANG, KE VAN
10 TRAN, aka "Kevin", KIARA PORSHA EASLEY, TO VAN LAI, aka "Took", CU VAN
11 HUYN, aka "Cucu", (collectively hereinafter "Defendants"), and others
12 known and unknown to the grand jury, did knowingly and intentionally
13 conspire to commit offenses against the United States as set forth below:

14 a. Operating an Illegal Gambling Business, in violation of
15 Title 18, United States Code, Section 1955, and,

16 b. Maintaining a Drug-Involved Premises, in violation of
17 Title 21, United States Code, Section 856(a)(1) and Title 18, United
18 States Code, Section 2.

19 MANNER AND MEANS OF CONSPIRACY

20 2. In furtherance of this conspiracy and to effect the objects
21 thereof, Defendants and other co-conspirators utilized the following
22 manner and means, among others:

23 a. It was a part of the conspiracy that the Defendants and
24 other co-conspirators engaged in the business of operating illegal
25 gambling establishments in violation of California Penal Code,
26 Sections 330a and 330.1.

27 b. It was a further part of the conspiracy that Defendants
28 and other co-conspirators engaged in business of operating illegal

1 gambling establishments and maintaining drug involved premises by
2 equipping the illegal gambling establishments with electronic gambling
3 machines which were programmed with several games of chance such as
4 poker, blackjack, keno, jacks or better, and slot games.

5 c. It was a further part of the conspiracy that Defendants
6 and other co-conspirators engaged in the business of operating illegal
7 gambling establishments and maintaining drug involved premises by
8 operating the gambling establishments 24 hours a day, seven days a week,
9 with some shutting down in the early morning hours and starting up again
10 in the afternoons.

11 d. It was a further part of the conspiracy that Defendants
12 and other co-conspirators engaged in the business of operating illegal
13 gambling establishments and maintaining drug involved premises by
14 outfitting the illegal gambling establishments with exterior and
15 interior video surveillance cameras, which were often monitored remotely
16 by the establishment owners and managers. Those locations equipped with
17 surveillance equipment often contain monitors showing live feed of the
18 video surveillance.

19 e. It was a further part of the conspiracy that Defendants
20 and other co-conspirators engaged in the business of operating illegal
21 gambling establishments and maintaining drug involved premises by
22 conducting audits of the gambling machines, which often took in more
23 than \$3000 per day. Such audits were often carried out several times in
24 a twenty-four hour period when the bank roll reached a specified amount,
25 such as \$2,000. This was done to reduce potential losses to the business
26 from robbery and law enforcement seizures. The employees kept the
27 patrons at a distance or directed them to step outside during the audits
28 to reduce the risk of patrons robbing the business. The audits were

1 conducted by trusted employees who used a key to unlock and open the
2 gambling machines, retrieved the money from inside of the machines,
3 photographed the master audit screen of each machine showing the cash
4 in, cash out (winnings), and net gain/profit per machine, and clearing
5 the screen after each audit. Employees provided the master audit screen
6 photographs with the owners/managers. The employees would also document
7 the cash in, cash out, net gain, loans to customers, and other
8 information in paper ledgers.

9 f. It was further part of the conspiracy that Defendants and
10 other co-conspirators engaged in the business of operating illegal
11 gambling establishments and maintaining drug involved premises by taking
12 actions to conceal the identity of the true owners of the gambling
13 establishments. In order to conceal their identities, the owners would
14 frequently avoid physically entering their own establishments, but
15 instead relied on trusted associates to open, operate and maintain the
16 illegal gambling dens, and to rent property and obtain utilities for
17 these establishments, to reduce the likelihood that the true owners
18 would be identified by law enforcement.

19 g. It was further part of the conspiracy that Defendants and
20 other co-conspirators engaged in the business of operating illegal
21 gambling establishments and maintaining drug involved premises by
22 employing individuals in specific roles to operate the illegal gambling
23 establishments. The roles included:

24 h. A doorman who acted as an enforcer to handle disturbances
25 within the illegal gambling establishment, screened patrons for entry
26 into the illegal gambling establishment, monitored the video
27 surveillance equipment, and reacted to law enforcement presence.

28

1 i. A "banker" who carried the "bank roll," meaning the money
2 to provide change and winnings to customers. One or two bankers worked
3 inside each establishment at any given time.

4 j. A money courier who brought additional cash to employees
5 working inside the establishments, collected money from the regular
6 audits, and transported profits to the owners. The money courier also
7 acted as a manager who directed employees' actions and made decisions
8 on behalf of the owners at these locations.

9 k. It was a further part of the conspiracy that Defendants
10 and other co-conspirators communicated by electronic means, such as
11 cellular telephones and messaging applications, and discussed the
12 operation of illegal gambling establishments.

13 l. It was further part of the conspiracy that Defendants and
14 other co-conspirators engaged in the business of operating illegal
15 gambling establishments and maintaining drug involved premises by
16 allowing patrons to possess and use controlled substances, typically
17 methamphetamine, while gambling. The ability to consume controlled
18 substances while gambling enticed the patrons to frequent the illegal
19 gambling establishments.

20 m. It was further part of the conspiracy that Defendants and
21 other co-conspirators engaged in the business of operating illegal
22 gambling establishments and maintaining drug involved premises by
23 allowing the distribution of controlled substances inside the illegal
24 gambling establishments patrons were enticed to frequent the illegal
25 gambling establishment.

26 n. It was further part of the conspiracy that from at least
27 as early as November 2019 until February 6, 2020, defendants TRI VO,
28 TIEN LE, aka "Mr. Le", DONG VAN NGUYEN, MICHELLE EDWARDS, KHANG NGUYEN,

1 aka "K-Y", and LEETRI DANG, operated an illegal gambling establishment
2 at 2575 Fairmount Ave, a two-bedroom single detached residence just
3 south of Hamilton Elementary School, with 4 - 12 electronic gambling
4 machines ("Gaming Den #1").

5 o. It was further part of the conspiracy that from at least
6 as early as October 2019 until February 14, 2020, defendants TRI VO, KE
7 TRAN, aka "Kevin", and KIARRA EASLEY, operated an illegal gambling
8 establishment at 4065 Thorn Street, San Diego, California, a three-
9 bedroom residence, with 18 electronic gambling machines ("Gaming
10 Den #2").

11 p. It was further part of the conspiracy that from on or
12 about March 2020 until May 20, 2020, defendants DONG VAN NGUYEN, DANG
13 NGUYEN, TO VAN LAI, aka "Took", CU VAN HUYN, aka "Cucu", operated an
14 illegal gambling establishment at 4212 43rd Street, San Diego,
15 California, a two-bedroom residence, with 14 electronic gambling
16 machines ("Gaming Den #3").

17 OVERT ACTS

18 3. In furtherance of this conspiracy and to effect the objects
19 thereof, the following overt acts, among others, were committed within
20 the Southern District of California, and elsewhere:

21 a. On December 23, 2019, defendant MICHELLE EDWARDS stated
22 that she is on a probationary period as an employee and "Dong" is her
23 boss at Gaming Den #1 and paid winnings to patrons at Gaming Den #1.

24 b. On December 23, 2019, defendants MICHELLE EDWARDS and
25 DAPHNE NICOLE RIVERA sold methamphetamine to a cooperating individual
26 inside Gaming Den #1 while patrons consumed methamphetamine and gambled
27 on electronic gambling machines.

28

1 c. On December 30, 2019, defendants TIEN LE, aka "Mr. Le",
2 and MICHELLE EDWARDS conducted an audit of the electronic gambling
3 machines at Gaming Den #1, while defendants DONG NGUYEN and TRI VO
4 monitored their audit.

5 d. On December 30, defendant KHANG NGUYEN, aka "K-Y", worked
6 at Gaming Den #1.

7 e. On December 31, 2019, defendants TIEN LE, aka "Mr. Le",
8 and MICHELLE EDWARDS audited and removed cash from the electronic
9 gambling machines at Gaming Den #1.

10 f. On January 15, 2020, defendant TRI VO provided \$40.00 to
11 a cooperating individual to gamble on electronic gambling machines at
12 Gaming Den #2.

13 g. On January 15, 2020, defendant KIARA EASLEY worked as a
14 doorman and monitored surveillance cameras at Gaming Den #2.

15 h. On January 15, 2020, defendant TRI VO distributed
16 approximately two ounces (55 grams) of methamphetamine to a cooperating
17 individual at Gaming Den #2.

18 i. On January 28, 2020, defendant KE TRAN, aka "Kevin",
19 worked as a doorman and paid winnings to patrons at Gaming Den #2.

20 j. On January 31, 2020, defendant TRI VO sold approximately
21 two ounces (61.6 grams) of methamphetamine to a cooperating individual
22 at Gaming Den #2.

23 k. On January 24, 2020, defendant LEETRI DANG obtained money
24 from defendant TIEN LE, aka "Mr. Le", to pay winnings to patrons at
25 Gaming Den #1.

26 l. On February 12, 2020, defendant KE TRAN, aka "Kevin",
27 pain winnings to patrons at Gaming Den #2.

28

1 m. On February 12, 2020, defendant KIARA EASLEY worked as a
2 doorman at Gaming Den #2.

3 n. On April 3, 2020, defendant DONG VAN NGUYEN was present
4 at Gaming Den #3.

5 o. On April 23, 2020, defendant DANG NGUYEN provided
6 bankroll money to defendant TO VAN LAI, aka "Took", so that he could pay
7 gambling winnings and provide to change to customers at Gaming Den
8 #3.

9 p. On April 23, 2020, defendant DANG NGUYEN provided a small
10 bindle of methamphetamine to a patron at Gaming Den #3.

11 q. On April 30, 2020, TO VAN LAI, aka "Took", paid gambling
12 winnings to patrons at Gaming Den #3.

13 r. On April 30, 2020, defendant CU VAN HUYNH, aka "Cucu",
14 audited an electronic gambling machine, took money out of an electronic
15 gambling machine, and negotiated a methamphetamine sale to a cooperating
16 individual at Gaming Den #3.

17 s. On May 14, 2020, defendant TO VAN LAI, aka "Took", sold
18 approximately one ounce (28.3 grams) of methamphetamine to a cooperating
19 individual at Gaming Den #3.

20 All in violation of Title 18, United States Code, Section 371.

21 Count 2

22 ILLEGAL GAMBLING BUSINESS

23 [18 U.S.C. § 1955]

24 4. The allegations set forth in paragraphs 2 and 3 are realleged
25 and incorporated by reference as if fully set forth herein.

26 5. Beginning on a date unknown to the grand jury and continuing
27 up to on or about the date of this indictment, within the Southern
28 District of California and elsewhere, defendants TRI MINH VO, TIEN HONG

1 HONG LE, aka "Mr. Le", DONG VAN NGUYEN, DANG VAN NGUYEN, MICHELLE
2 SALVADORE EDWARDS, KHANG DINH NGUYEN, aka "K-Y", LEETRI DANG, KE VAN
3 TRAN, aka "Kevin", KIARA PORSHA EASLEY, TO VAN LAI, aka "Took", CU VAN
4 HUYN, aka "Cucu", and others, knowingly and intentionally conducted,
5 financed, managed, supervised, directed, and owned all and part of an
6 illegal gambling business involving the operation of electronic gambling
7 machines, which gambling business was a violation of the law of the
8 State of California in which it was conducted (that is, in violation of
9 California Penal Code, Sections 330a, and 330.1) and which involved at
10 least five persons who conducted, financed, managed, supervised,
11 directed, and owned all and part of the illegal gambling business, and
12 which remained in substantially continuous operation for a period in
13 excess of thirty days and had a gross revenue of at least \$2,000 in any
14 single day; in violation of Title 18, United States Code, Section 1955
15 and Title 18, United States Code, Section 2.

16 Count 3

17 MAINTAINING A DRUG INVOLVED PREMISES

18 [21 U.S.C. § 856(a)(1)]

19 6. The allegations set forth in paragraphs 2 and 3 are realleged
20 and incorporated by reference as if fully set forth herein.

21 7. Beginning on a date unknown to the grand jury, but at least
22 as early as November 2019, and continuing up to on or about February 6,
23 2020, within the Southern District of California, defendants TRI MINH
24 VO, TIEN HONG HONG LE, aka "Mr. Le", DONG VAN NGUYEN, MICHELLE SALVADORE
25 EDWARDS, KHANG DINH NGUYEN, aka "K-Y", LEETRI DANG, and others known
26 and unknown to the grand jury knowingly opened, leased, rented, used and
27 maintained any place, permanently and temporarily, namely: 2575
28 Fairmount Avenue, San Diego, California; for the purpose of

1 manufacturing, distributing, and using controlled substances; all in
2 violation of Title 21, United States Code, Section 856(a)(1).

3 Count 4

4 MAINTAINING A DRUG INVOLVED PREMISES

5 [21 U.S.C. § 856(a)(1)]

6 8. The allegations set forth in paragraphs 2 and 3 are realleged
7 and incorporated by reference as if fully set forth herein.

8 9. Beginning on a date unknown to the grand jury, but at least
9 as early as October 2019, and continuing up to on or about February 14,
10 2020, within the Southern District of California, defendants TRI MINH
11 VO, KE VAN TRAN, aka "Kevin", KIARA PORSHA EASLEY, and others known and
12 unknown to the grand jury knowingly opened, leased, rented, used and
13 maintained any place, permanently and temporarily, namely: 4065 Thorn
14 Street, San Diego, California; for the purpose of manufacturing,
15 distributing, and using controlled substances; all in violation of Title
16 21, United States Code, Section 856(a)(1).

17 Count 5

18 MAINTAINING A DRUG INVOLVED PREMISES

19 [21 U.S.C. § 856(a)(1)]

20 10. The allegations set forth in paragraphs 2 and 3 are realleged
21 and incorporated by reference as if fully set forth herein.

22 11. Beginning on a date unknown to the grand jury, but at least
23 as early as December 2019, and continuing up to on or about October 15,
24 2020, within the Southern District of California, defendants DONG VAN
25 NGUYEN, DANG VAN NGUYEN, TO VAN LAI, aka "Took", CU VAN HUYN, aka
26 "Cucu", and others known and unknown to the grand jury knowingly opened,
27 leased, rented, used and maintained any place, permanently and
28 temporarily, namely: 4212 43rd Street, San Diego, California; for the

1 purpose of manufacturing, distributing, and using controlled substances;
2 all in violation of Title 21, United States Code, Section 856(a)(1) and
3 Title 18, United States Code, Section 2.

4 Count 6

5 DISTRIBUTION OF METHAMPHETAMINE

6 [21 U.S.C. § 841(a)(1)]

7 12. On or about, December 23, 2019, within the Southern District
8 of California, defendants MICHELLE SALVADORE EDWARDS and DAPHNE NICOLE
9 RIVERA, did knowingly and intentionally distribute 50 grams and more,
10 to wit: approximately 79.9 grams of methamphetamine (actual), a Schedule
11 II Controlled Substance; in violation of Title 21, United States Code,
12 Section 841(a)(1), and Title 18, United States Code, Section 2.

13 Count 7

14 DISTRIBUTION OF METHAMPHETAMINE

15 [21 U.S.C. § 841(a)(1)]

16 13. On or about January 31, 2020, within the Southern District
17 of California, defendant TRI MINH VO did knowingly and intentionally
18 distribute 50 grams and more, to wit: approximately 61.6 grams of
19 methamphetamine (actual), a Schedule II Controlled Substance; in
20 violation of Title 21, United States Code, Section 841(a)(1).

21 Count 8

22 DISTRIBUTION OF METHAMPHETAMINE

23 [21 U.S.C. § 841(a)(1)]

24 14. On or about April 23, 2020, within the Southern District of
25 California, defendant WILLIAM VANNA BOUNSAVATH, aka "Ray Ray", did
26 knowingly and intentionally distribute 5 grams and more, to wit:
27 approximately 12.8 grams of methamphetamine (actual), a Schedule II
28

1 Controlled Substance; in violation of Title 21, United States Code,
2 Section 841(a)(1) and Title 18, United States Code, Section 2.

3 Count 9

4 DISTRIBUTION OF METHAMPHETAMINE

5 [21 U.S.C. § 841(a)(1)]

6 15. On or about April 30, 2020, within the Southern District of
7 California, defendants ALMA SOCORRO SILVA and TONY NGUYEN, aka "Lucky",
8 did knowingly and intentionally distribute 5 grams and more, to wit:
9 approximately 45 grams of methamphetamine (actual), a Schedule II
10 Controlled Substance; in violation of Title 21, United States Code,
11 Sections 841(a)(1), and Title 18, United States Code, Section 2.

12 Count 10

13 DISTRIBUTION OF METHAMPHETAMINE

14 [21 U.S.C. § 841(a)(1)]

15 16. On or about May 14, 2020, within the Southern District of
16 California, defendants TO VAN LAI, aka "Took", and TONY NGUYEN, aka
17 "Lucky" did knowingly and intentionally distribute 5 grams and more, to
18 wit: approximately 28.3 grams of methamphetamine (actual), a
19 Schedule II Controlled Substance; in violation of Title 21, United
20 States Code, Section 841(a)(1), and Title 18, United States Code,
21 Section 2.

22 Count 11

23 POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE

24 [21 U.S.C. § 841(a)(1)]

25 17. On or about February 24, 2021, within the Southern District
26 of California, defendant WILLIAM VANNA BOUNSAVATH, aka "Ray Ray", did
27 knowingly and intentionally possess with intent to distribute 5 grams
28 and more, to wit: approximately 22.0 grams of methamphetamine (actual),

1 a Schedule II Controlled Substance; in violation of Title 21, United
2 States Code, Section 841(a)(1).

3 FORFEITURE ALLEGATIONS

4 18. The allegations contained in Counts 1 through 11 are realleged
5 and by their reference fully incorporated herein for the purpose of
6 alleging forfeiture to the United States of America pursuant to Title 18,
7 United States Code, Sections 981(a)(1)(c) and 1955(d), Title 28, United
8 States Code, Section 2461(c), and Title 21, United States Code,
9 Section 853.

10 Forfeiture Allegation as to Count 1

11 19. Upon conviction of the offense alleged in Count 1 of this
12 Indictment, and pursuant to Title 18, United States Code,
13 Sections 981(a)(1)(c) and 1955, and Title 28, United States Code,
14 Section 2461(c), defendants TRI VO, TIEN LE, aka "Mr. Le", DONG VAN
15 NGUYEN, DANG NGUYEN, MICHELLE EDWARDS, KHANG NGUYEN, aka "K-Y", LEETRI
16 DANG, KE TRAN, aka "Kevin", KIARA EASLEY, TO VAN LAI, aka "Took", CU VAN
17 HUYN, aka "Cucu", shall forfeit to the United States all their rights,
18 title and interest in any and all property, real or personal, which
19 constitutes or is derived from proceeds, traceable to the offense, and
20 any property, including but not limited to, currency used in the
21 violation of the offense.

22 Forfeiture Allegation as to Count 2

23 20. Upon conviction of the offense alleged in Count 2 of this
24 Indictment, and pursuant to Title 18, United States Code,
25 Section 981(a)(1)(c) and 1955, and Title 28, United States Code, Section
26 2461(c), defendants TRI VO, TIEN LE, aka "Mr. Le", DONG VAN NGUYEN, DANG
27 NGUYEN, MICHELLE EDWARDS, KHANG NGUYEN, aka "K-Y", LEETRI DANG, KE
28 TRAN, aka "Kevin", KIARA EASLEY, TO VAN LAI, aka "Took", CU VAN HUYN,

1 aka "Cucu", shall forfeit to the United States all their rights, title
2 and interest in any and all property, real or personal, which constitutes
3 or is derived from proceeds, traceable to the offense, and any property,
4 including but not limited to, currency used in the violation of the
5 offense.

6 Forfeiture Allegation as to Counts 3 through 11

7 21. Upon conviction of any of the felony offenses alleged in
8 Counts 3 through 11 of this Indictment, said violations being punishable
9 by imprisonment for more than one year and pursuant to Title 21, United
10 States Code, Section 853(a)(1) and 853(a)(2), defendants TRI VO, TIEN
11 LE, aka "Mr. Le", DONG VAN NGUYEN, MICHELLE EDWARDS, KHANG NGUYEN, aka
12 "K-Y", LEETRI DANG, KE TRAN, aka "Kevin", KIARA EASLEY, DANG VAN NGUYEN,
13 TO VAN LAI, aka "Took", CU VAN HUYN, aka "Cucu", DAPHNE NICOLE RIVERA,
14 WILLIAM BOUNSAVATH, aka "Ray Ray", ALMA SOCORRO SILVA, and TONY NGUYEN,
15 aka "Lucky", shall forfeit to the United States all rights, title and
16 interest in any and all property constituting, or derived from, any
17 proceeds the defendants obtained, directly or indirectly, as the result
18 of the offenses, and any and all property used or intended to be used
19 in any manner or part to commit and to facilitate the commission of the
20 violations alleged in Counts 3 through 11 of this Indictment.

21 Specific Property

22 22. Based on the above forfeiture allegations for Counts 1
23 through 11, the property to be forfeited includes, but is not limited
24 to: one gambling machine labeled #5, one gambling machine labeled #7,
25 one gambling machine labeled #8, and one stand up gambling machine
26 numbered 9 seized from 2575 Fairmount Avenue, San Diego, CA; twenty-
27 four electronic gambling machines seized from 4065 Thorn Street,
28 San Diego, CA; and twenty-one electronic gambling machines seized from

1 4212 43rd Street, San Diego, CA.

2 //

3 23. If any of the above-described forfeitable property, as a
4 result of any act or omission of the defendants:

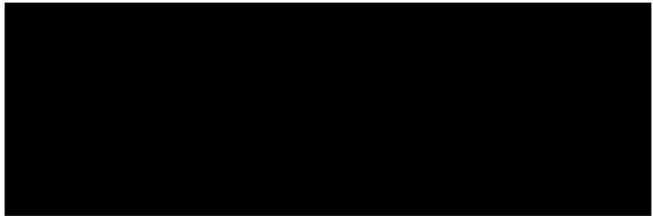
- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a
7 third party;
- 8 c. has been placed beyond the jurisdiction of the court;
- 9 d. has been substantially diminished in value; or
- 10 e. has been commingled with other property which cannot be

11 divided without difficulty;

12 it is the intent of the United States, pursuant to Title 21, United
13 States Code, Section 853(p), and Title 28, United States Code,
14 Section 2461(c), to seek forfeiture of any other property of the
15 defendants up to the value of the forfeitable property described above
16 as being subject to forfeiture.

17 All pursuant to Title 21, United States Code, Section 853, Title 18,
18 United States Code, Sections 981(a)(1)(C) and 1955(d), and Title 28,
19 United States Code, Section 2461(c).

20 DATED: April 9, 2021.



21
22
23 RANDY S. GROSSMAN
Acting United States Attorney

24 By: _____
25 A. DALE BLANKENSHIP
26 Assistant U.S. Attorney

27 By: _____
28 MATTHEW BREHM
Assistant U.S. Attorney