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SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

November 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

LE THI LE (1),
aka "Chi Le,"
PHOUNG THANH BUI (2),

Defendants.

Case No. '21 CR1112H

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) -
Distribution of Methamphetamine;
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., Sec. 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

The grand jury charges:

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1 machines which were programmed with several games of chance such as
2 poker, blackjack, keno, jacks or better, and slot games.

3 c. It was a further part of the conspiracy that Defendants
4 and other co-conspirators engaged in the business of operating illegal
5 gambling establishments and maintaining drug involved premises by
6 operating the gambling establishment seven days a week, shutting down
7 in the early morning hours and starting up again in the evening.

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

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

1 in, cash out (winnings), and net gain/profit per machine, and clearing
2 the screen after each audit. Employees provided the master audit screen
3 photographs with the owners/managers. The employees would also document
4 the cash in, cash out, net gain, loans to customers, and other
5 information in paper ledgers.

6 f. It was further part of the conspiracy that Defendants and
7 other co-conspirators engaged in the business of operating illegal
8 gambling establishments and maintaining drug involved premises by
9 employing individuals in specific roles to operate the illegal gambling
10 establishments. The roles included:

11 g. A doorman who acted as an enforcer to handle disturbances
12 within the illegal gambling establishment, screened patrons for entry
13 into the illegal gambling establishment, monitored the video
14 surveillance equipment, and reacted to law enforcement presence.

15 h. A "banker" who carried the "bank roll," meaning the money
16 to provide change and winnings to customers. One or two bankers worked
17 inside each establishment at any given time.

18 i. It was a further part of the conspiracy that Defendants
19 and other co-conspirators communicated by electronic means, such as
20 cellular telephones and messaging applications, and discussed the
21 operation of illegal gambling establishments.

22 j. It was further part of the conspiracy that Defendants and
23 other co-conspirators engaged in the business of operating illegal
24 gambling establishments and maintaining drug involved premises by
25 allowing patrons to possess and use controlled substances, typically
26 methamphetamine, while gambling. The ability to consume controlled
27 substances while gambling enticed the patrons to frequent the illegal
28 gambling establishments.

1 k. It was further part of the conspiracy that Defendants and
2 other co-conspirators engaged in the business of operating illegal
3 gambling establishments and maintaining drug involved premises by
4 allowing the distribution of controlled substances inside the illegal
5 gambling establishments patrons were enticed to frequent the illegal
6 gambling establishment.

7 l. It was further part of the conspiracy that from at least
8 as early as January 2018 until October 15, 2020, defendants LE THI LE,
9 aka "Chi Le", and PHUONG THANH BUI, operated an illegal gambling
10 establishment at 4258 1/2 Euclid Avenue, San Diego, California, with
11 approximately 9 electronic gambling machines ("Gaming Den #1").

12 m. It was further part of the conspiracy that from at least
13 as early as December 2020 up to and including the date of this indictment
14 defendant LE THI LE, aka "Chi Le", operated Gaming Den #1.

15 OVERT ACTS

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

19 a. On December 30, 2020, defendant PHUONG THANH BUI worked
20 as a doorman and monitored video surveillance cameras at Gaming Den #1.

21 b. On December 30, 2020, defendant PHUONG THANH BUI sold
22 approximately 16.8 grams of methamphetamine (actual) to a cooperating
23 individual at Gaming Den #1.

24 c. On January 7, 2020, defendant LE THI LE, aka "Chi Le",
25 provided cash to a Gaming Den #1 employee, Thanh Trung Nguyen.

26 d. January 17, 2020, defendant LE THI LE, aka "Chi Le", was
27 present at Gaming Den #1 and was monitoring its operation.

28

1 e. On February 4, 2020, defendant PHUONG THANH BUI worked
2 as a doorman at Gaming Den #1.

3 f. On February 11, 2020, defendant PHUONG THANH BUI provided
4 a small amount of methamphetamine to a patron and sold a small amount
5 of methamphetamine to a cooperating individual at Gaming Den #1.

6 g. On February 11, 2020, Christian Troy Coronado sold 10.6
7 grams of methamphetamine (actual) to a cooperating individual at Gaming
8 Den #1.

9 h. On January 17, 2020, Michelle Salvador Edwards worked at
10 Gaming Den #1 as a doorman and monitored video surveillance cameras.

11 i. On October 10, 2020, Son Le worked as a doorman and
12 removed cash from electronic gambling machines at Gaming Den #1.

13 j. On March 10, 2021, Hai Dang worked as a doorman and Bay
14 LNU, cashed out patrons and provided change to patrons at Gaming Den #1.
15 All in violation of Title 18, United States Code, Section 371.

16 Count 2

17 ILLEGAL GAMBLING BUSINESS

18 [18 U.S.C. § 1955]

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

21 5. Beginning on a date unknown to the grand jury and continuing
22 up to on or about the date of this indictment, within the Southern
23 District of California and elsewhere, defendants LE THI LE, aka "Chi
24 Le", PHOUNG THANH BUI, and others, knowingly and intentionally
25 conducted, financed, managed, supervised, directed, and owned all and
26 part of an illegal gambling business involving the operation of
27 electronic gambling machines, which gambling business was a violation
28 of the law of the State of California in which it was conducted (that

1 is, in violation of California Penal Code, Sections 330a, and 330.1) and
2 which involved at least five persons who conducted, financed, managed,
3 supervised, directed, and owned all and part of the illegal gambling
4 business, and which remained in substantially continuous operation for
5 a period in excess of thirty days and had a gross revenue of at least
6 \$2,000 in any single day; in violation of Title 18, United States Code,
7 Section 1955 and Title 18, United States Code, Section 2.

8 Count 3

9 MAINTAINING A DRUG INVOLVED PREMISES

10 [21 U.S.C. § 856(a)(1)]

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

13 7. Beginning on a date unknown to the grand jury, but at least
14 as early as January 2018, and continuing up to on or about October 11,
15 2020, within the Southern District of California, defendants LE THI LE,
16 aka "Chi Le", PHOUNG THANH BUI and others known and unknown to the grand
17 jury knowingly opened, leased, rented, used and maintained any place,
18 permanently and temporarily, namely: 4258 Euclid Avenue, San Diego,
19 California; for the purpose of manufacturing, distributing, and using
20 controlled substances; all in violation of Title 21, United States Code,
21 Section 856(a)(1) and Title 18, United States Code, Section 2.

22 Count 4

23 DISTRIBUTION OF METHAMPHETAMINE

24 [21 U.S.C. § 841(a)(1)]

25 8. On or about December 30, 2020, within the Southern District
26 of California, defendant PHOUNG THANH BUI, did knowingly and
27 intentionally distribute 5 grams and more, to wit: approximately
28 16.8 grams of methamphetamine (actual), a Schedule II Controlled

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

3 FORFEITURE ALLEGATIONS

4 9. The allegations contained in Counts 1 through 4 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), and Title 28,
8 United States Code, Section 2461(c), and Title 21, United States Code
9 Section 853.

10 Forfeiture Allegation as to Count 1

11 10. 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(d), and Title 28, United States Code,
14 Section 2461(c), defendants LE THI LE, aka "Chi Le", and PHOUNG THANH
15 BUI, shall forfeit to the United States all their rights, title and
16 interest in any and all property, real or personal, which constitutes
17 or is derived from proceeds, traceable to the offense, and any property,
18 including, but not limited to, currency used in violation of the offense.

19 Forfeiture Allegation as to Count 2

20 11. Upon conviction of the offense alleged in Count 2 of this
21 Indictment, and pursuant to Title 18, United States Code,
22 Sections 981(a)(1)(C) and 1955(d), and Title 28, United States Code,
23 Section 2461(c), defendants LE THI LE, aka "Chi Le", and PHOUNG THANH
24 BUI, shall forfeit to the United States all their rights, title and
25 interest in any and all property, real or personal, which constitutes
26 or is derived from proceeds, traceable to the offense, and any property,
27 including, but not limited to, currency used in violation of the offense.

28 Forfeiture Allegation as to Counts 3 and 4

1 12. Upon conviction of any of the felony offenses alleged in
2 Counts 3 and 4 of this Indictment, said violations being punishable by
3 imprisonment for more than one year and pursuant to Title 21, United
4 States Code, Sections 853(a)(1) and 853(a)(2), defendants LE THI LE,
5 aka "Chi Le", and PHOUNG THANH BUI, shall forfeit to the United States
6 all rights, title and interest in any and all property constituting, or
7 derived from, any proceeds the defendants obtained, directly or
8 indirectly, as the result of the offenses, and any and all property used
9 or intended to be used in any manner or part to commit and to facilitate
10 the commission of the violations alleged in Counts 3 and 4 of this
11 Indictment.

12 Specific Property

13 13. Based on the above forfeiture allegations for Counts 1
14 through 4, the property to be forfeited includes, but is not limited to:
15 seven table top electronic gambling machines seized from 4258 1/2 Euclid
16 Ave, San Diego, CA; one full size electronic gambling machine seized
17 from 4258 1/2 Euclid Ave, San Diego, CA; three table top electronic
18 gambling machines seized from 4264 Euclid Ave #2, San Diego, CA; \$13,930
19 in US Currency seized from 4258 1/2 Euclid Ave, San Diego, CA; and \$693
20 in US Currency Seized from 4264 #2 Euclid Ave, San Diego, CA.

21 14. If any of the above-described forfeitable property, as a
22 result of any act or omission of the defendants:

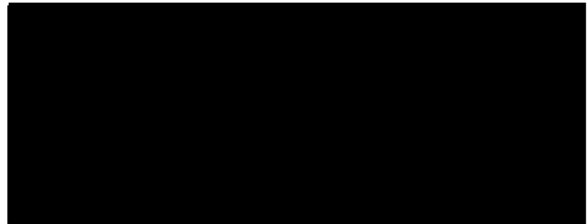
- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third
25 party;
26 c. has been placed beyond the jurisdiction of the court;
27 d. has been substantially diminished in value; or
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1 e. has been commingled with other property which cannot be
2 divided without difficulty;

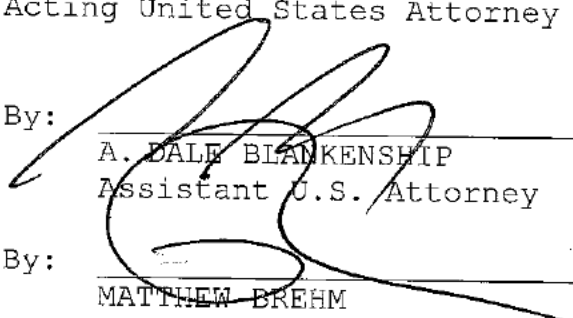
3 it is the intent of the United States, pursuant to Title 21, United
4 States Code, Section 853(p), and Title 28, United States Code,
5 Section 2461(c), to seek forfeiture of any other property of the
6 defendants up to the value of the forfeitable property described above
7 as being subject to forfeiture.

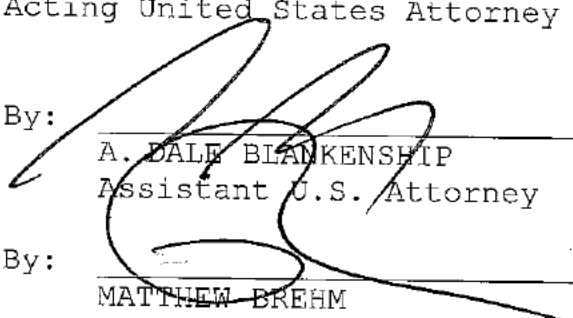
8 All pursuant to Title 21, United States Code, Section 853, Title 18,
9 United States Code, Sections 981(a)(1)(C) and 1955(d), and Title 28,
10 United States Code, Section 2461(c).

11 DATED: April 9, 2021.



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Acting United States Attorney

17
18 By: 
19 A. DALE BLANKENSHIP
Assistant U.S. Attorney

20 By: 
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