

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNDER SEAL

UNITED STATES OF AMERICA

3:15-CR-00026-SI

v.

INDICTMENT

KIET ANH VO
VINH TUONG NGUYEN, aka "Vince"
QUAN ANH HO
TAN QUOC TRAN
DUY HUYNH
NHAT LUU
HOA NGUYEN
THAI VIET HUYNH,

18 U.S.C. § 1956(a)(1)(A)(i),
(a)(1)(B)(i), (h)

Forfeiture Allegations
18 U.S.C. § 982(a)(1)

UNDER SEAL

Defendants.

THE GRAND JURY CHARGES:

COUNT 1
(Conspiracy to Commit Money Laundering)
(18 U.S.C. § 1956(a)(1)(A)(i) ,(h))

From in or about April, 2014 through the date of this indictment, in the District of Oregon and elsewhere, the defendants KIET ANH VO, VINH TUONG NGUYEN, QUAN ANH HO, TAN QUOC TRAN, DUY HUYNH, NHAT LUU, HOA NGUYEN, and THAI VIET HUYNH, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is operating an illegal gambling business in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful

activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

MANNER AND MEANS

The manner and means used to accomplish the objective of the conspiracy included among others, the following:

1. It was part of the conspiracy that defendant KIET ANH VO financed, managed, supervised and directed a gambling business that violated the laws of the State of Oregon, involved multiple sub-agents or "bookies" who financed, managed, supervised and directed the illegal gambling business, and said illegal gambling business was in continuous operation since at least April 2014.
2. It was part of the conspiracy that defendant KIET ANH VO employed sub-agents or "bookies," including defendants QUAN AHN HO, TAN QUOC TRAN, DUY HUYNH, NHAT LUU, HOA NGUYEN and THAI HUYNH to take bets from customers off-line (over the phone or in person) and on-line via the organization's gambling web site www.vnbets.net.
3. It was part of the conspiracy that defendant KIET ANH VO and the sub agents working for him, including defendants QUAN ANH HO, TAN QUOC TRAN, DUY HUYNH, NHAT LUU, HOA NGUYEN and THAI HUYNH , would charge and collect a percentage fee for each bet placed and the amount would vary based upon the individual gambler and the amount of the wager.
4. It was part of the conspiracy that the sub agents working for defendant KIET ANH VO, including defendants QUAN ANH HO, TAN QUOC TRAN, DUY HUYNH, NHAT

LUU, HOA NGUYEN and THAI HUYNH, would and did collect gambling losses from customers who placed bets on sporting events and pay out gambling winnings to customers on a weekly basis.

5. It was part of the conspiracy that the sub agents working for defendant KIET ANH VO, including defendant QUAN ANH HO would and did deposit gambling proceeds in conspirator bank accounts to pay gambling winnings.
6. It was part of the conspiracy that the sub agents, including defendants QUAN ANH HO, TAN QUOC TRAN, DUY HUYNH, NHAT LUU, HOA NGUYEN and THAI HUYNH, working for defendant KIET ANH VO would and did access individual accounts on the gambling website www.vnbets.net with a username and password authorized by defendant KIET ANH VO.
7. It was part of the conspiracy that defendant KIET ANH VO had the authority to authorize increased wager limits for specific gamblers as requested by sub agents working for VO.
8. It was part of the conspiracy that the U.S. currency that represented the gambling winnings and losses off-line and on line via the gambling web site www.vnbets.net were paid out to and collected from customers in person often through defendant VINH TUONG NGUYEN.
9. It was part of the conspiracy that defendants KIET ANH VO and VINH TUONG NGUYEN used illegal gambling proceeds to operate their business the Lava Café in Portland, Oregon.
10. It was part of the conspiracy that members of the conspiracy would and did meet at defendant KIET ANH VO and VINH TUONG NGUYEN's business, Lava Café, to place off-line bets, and to drop off and pick up currency that represented gambling proceeds.

11. It was part of the conspiracy that defendant KIET ANH VO would place "lay-off" bets with third party sub agents, such as defendant THAI VIET HUYNH, to balance the books and mitigate the risk to VO's illegal gambling business.

All in Violation of Title 18, United States Code, Section 1956(h).

COUNT 2
(Conspiracy to Commit Money Laundering)
(18 U.S.C. § 1956(a)(1)(A)(i), (a)(1)(B)(i), (h))

From in or about January 2014 through the date of this indictment, in the District of Oregon and elsewhere, the defendants KIET AHN VO and VINH TUONG NGUYEN, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 21, United States Code, Section 841(a)(1), to wit:

- (a) to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is distribution of a controlled substance in violation of Title 21, United States Code, Section 841(a)(1) of the Controlled Substance Act, with the intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and
- (b) to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is distribution of a controlled substance in violation of Title 21, United States Code, Section 841(a)(1) of the Controlled Substance Act, knowing that the

transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. It was part of the conspiracy that defendants KIET ANH VO and VINH TUONG NGUYEN would and did purchase bulk marijuana from wholesale distributors on the west coast and ship quantities of bulk marijuana to locations in the eastern United States such as Knoxville, Tennessee and Charlotte, North Carolina.
2. It was part of the conspiracy that the recipients of the bulk marijuana would deposit cash proceeds into various bank accounts belonging to defendant NGUYEN and other associates and relatives to pay for the marijuana shipped.
3. It was part of the conspiracy that defendant NGUYEN would travel to locations in the eastern United States to collect drug proceeds in person and transport the proceeds back to the District of Oregon on commercial airlines.
4. It was part of the conspiracy that on August 28, 2014, defendant NGUYEN possessed \$69,785 in proceeds from the illegal distribution of marijuana when he arrived on a flight from North Carolina to Portland, Oregon.

All in violation of Title 18, United States Code, Section 1956(h).

FIRST FORFEITURE ALLEGATION

Upon conviction of the money laundering offense alleged in Count 1 of this indictment, defendants KIET AHN VO, VINH TUONG NGUYEN, QUAN ANH HO, TAN QUOC TRAN, DUY HUYNH, NHAT LUU, HOA NGUYEN, and THAI VIET HUYNH shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1), any and all property, real or personal, involved in the money laundering offense and all property traceable to such property, including but not limited to the following:

A money judgment for a sum of money equal to the amount of property involved in the conspiracy, for which the defendants are jointly and severally liable.

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

SECOND FORFEITURE ALLEGATION

Upon conviction of the money laundering offense alleged in Count 2 of this indictment, defendants KIET AHN VO and VINH TUONG NGUYEN shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1), any and all property, real or personal, involved in the money

laundering offense and all property traceable to such property, including but not limited to the following:

A money judgment for a sum of money equal to the amount of property involved in the conspiracy, for which the defendants are jointly and severally liable.

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

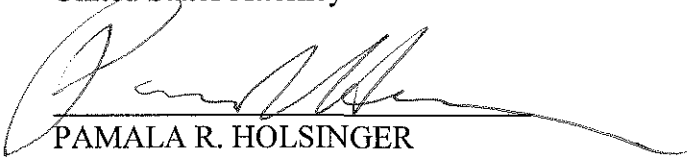
Dated this 21 day of January 2015.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney


PAMALA R. HOLSINGER
GEOFFREY A. BARROW
Assistant United States Attorneys

Indictment