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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)
14 v.)
15 CUONG MACH BINH TIEU, et. al.,)
16 Defendants.)
17

No. CR 11 0097 CRB

**MOTION TO UNSEAL REDACTED
INDICTMENT**

18 The United States of America respectfully moves this Court for an order unsealing
19 the attached redacted Indictment in this matter. The indictment is redacted to remove the
20 name of a single defendant who has not yet been located or contacted by law
21 enforcement. The United States requests that the redacted indictment be made part of the
22 record in this case.

24 DATED: March 3, 2011

Respectfully submitted,

MELINDA HAAG
United States Attorney


AARON D. WEGNER
ROBERT DAVID REES
Assistant United States Attorneys

**ORIGINAL
FILED**

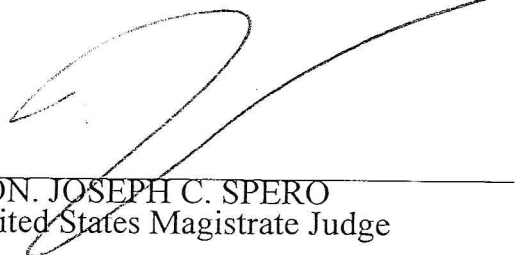
MAR - 3 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

[Faint stamp: Filed in accordance with...]
[Handwritten signature]
Date 3-3-11

ORDER

Good cause appearing therefor, it is hereby ordered that the attached redacted indictment, in the above-captioned case be unsealed and made part of the record. The Court finds good cause for the United States to redact a single individual from the indictment, and that person's identity shall remain sealed, as shall the unredacted indictment. The Clerk of the Court shall make the attached redacted indictment part of the record in the above-captioned case.



HON. JOSEPH C. SPERO
United States Magistrate Judge

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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

See Attachments (Forty Eight Total Counts, Three Forfeiture Counts)

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: See Attachments

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any) FBI & DEA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

MAGISTRATE CASE NO.

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form Melinda Haag

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Rees and Wegner

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments: PLEASE FILE UNDER SEAL

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT

See Attachments

DISTRICT COURT NUMBER

CR 11 0097

DEFENDANT

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
1) If not detained give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
5) On another conviction
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes/No

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 provided the original is in my office.

I hereby certify that the annexed instrument is a true and correct copy of the original filed in my office.

RICHARD W. WIEKING
Clerk, U.S. District Court
Northern District of California

By: Deputy Clerk

Date:

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
CUONG MACH BINH TIEU (10 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 3, 7, and 21: Drug Conspiracy—§ 846 (50+g methamphetamine; 5+kg cocaine)
10 Years–Life Imprisonment
5 Years–Life Supervised Release
\$4,000,000 Fine

COUNT 4: Drug Distribution/Manufacture—§ 841(a) (50+g methamphetamine)
10 Years–Life Imprisonment
5 Years–Life Supervised Release
\$4,000,000 Fine

COUNT 5: Drug Conspiracy—§ 846 (listed chemicals)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 6: Listed Chemicals—§ 841(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 8: Drug Distribution/Manufacture—§ 841(a) (methamphetamine)
20 Years Imprisonment
3 Years–Life Supervised Release
\$1,000,000 Fine

COUNT 22: Drug Distribution/Manufacture—§ 841(a) (500+g cocaine)
5–40 Years Imprisonment
4 Years–Life Supervised Release
\$2,000,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
LAP THE CHUNG (12 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 9, 13, 17, and 18: Drug Distribution—§ 841(a) (MDMA)
20 Years Imprisonment
3 Years–Life Supervised Release
\$1,000,000 Fine

COUNTS 12 and 16: Drug Conspiracy—§ 846 (MDMA)
20 Years Imprisonment
3 Years–Life Supervised Release
\$1,000,000 Fine

COUNTS 10, 11, 28, & 29: Extortionate Credit/Conspiracy—§ 892(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
BOB YUEN (16 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 10, 11, 14, 15, 28, 29, 30, 31, 32, 38, 39, and 42: Extortionate Credit/Conspiracy—§ 892(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 46 and 47: Extortionate Collection/Conspiracy—§ 894(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
██████████(6 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 10 and 11: Extortionate Credit/Conspiracy—§ 892(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 46 and 47: Extortionate Collection/Conspiracy—§ 894(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
DING LIN (12 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 5: Drug Conspiracy—§ 846 (listed chemicals)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 6: Listed Chemicals—§ 841(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 7: Drug Conspiracy—§ 846 (50+g methamphetamine)
10 Years–Life Imprisonment
5 Years–Life Supervised Release
\$4,000,000 Fine

COUNT 8: Drug Distribution/Manufacture—§ 841(a) (methamphetamine)
20 Years Imprisonment
3 Years–Life Supervised Release
\$1,000,000 Fine

COUNTS 33, 34, 40, 41, and 45: Extortionate Credit/Conspiracy—§ 892(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 48: Extortionate Collection—§ 894(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
SKYLER CHANG (8 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 3 and 7: Drug Conspiracy—§ 846 (50+g methamphetamine; 5+kg cocaine)
10 Years–Life Imprisonment
5 Years–Life Supervised Release
\$4,000,000 Fine

COUNT 4: Drug Distribution/Manufacture—§ 841(a) (50+g methamphetamine)
10 Years–Life Imprisonment
5 Years–Life Supervised Release
\$4,000,000 Fine

COUNT 5: Drug Conspiracy—§ 846 (listed chemicals)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 6: Listed Chemicals—§ 841(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 8: Drug Distribution/Manufacture—§ 841(a) (methamphetamine)
20 Years Imprisonment
3 Years–Life Supervised Release
\$1,000,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
CHEA BOU (8 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 12 and 16: Drug Conspiracy—§ 846 (MDMA)
20 Years Imprisonment
3 Years–Life Supervised Release
\$1,000,000 Fine

COUNTS 13, 17, 27, and 35: Drug Distribution—§ 841(a) (MDMA)
20 Years Imprisonment
3 Years–Life Supervised Release
\$1,000,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
BAO PHUNG (1 Count)

COUNT 43: Extortionate Credit—§ 892(a)

20 Years Imprisonment

3 Years Supervised Release

\$250,000 Fine

\$100 Special Assessment

Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
MAY CHUNG (8 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 10, 11, 14, 15, 31, and 32: Extortionate Credit/Conspiracy—§ 892(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
THANH CHU (2 Counts)

COUNTS 31 and 32: Extortionate Credit/Conspiracy—§ 892(a)

20 Years Imprisonment

3 Years Supervised Release

\$250,000 Fine

\$100 Special Assessment

Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
HUNG TIEU (10 Counts)

COUNT 1: RICO Conspiracy—§ 1962(d)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNT 2: RICO—§ 1962(c)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

COUNTS 19, 20, 23, 24, 25, 26, 36, and 37: Extortionate Credit/Conspiracy—§ 892(a)
20 Years Imprisonment
3 Years Supervised Release
\$250,000 Fine

As to all Counts: \$100 Special Assessment
Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
KWAI WONG (6 Counts)

COUNTS 19, 20, 33, 34, 36, and 37: Extortionate Credit/Conspiracy—§ 892(a)

20 Years Imprisonment

3 Years Supervised Release

\$250,000 Fine

\$100 Special Assessment

Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
JOHN CHEW (4 Counts)

COUNTS 23, 24, 40, and 41: Extortionate Credit/Conspiracy—§ 892(a)

20 Years Imprisonment

3 Years Supervised Release

\$250,000 Fine

\$100 Special Assessment

Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
BAO TRAN (4 Counts)

COUNTS 23, 24, 25, and 26: Extortionate Credit/Conspiracy—§ 892(a)

20 Years Imprisonment

3 Years Supervised Release

\$250,000 Fine

\$100 Special Assessment

Potential Immigration and Deportation Consequences

PENALTY SHEET ATTACHMENT (Charges and Maximum Penalties by Defendant)
BILLY KET CHAU (1 Count)

COUNT 44: Extortionate Credit/Conspiracy—§ 892(a)

20 Years Imprisonment

3 Years Supervised Release

\$250,000 Fine

\$100 Special Assessment

Potential Immigration and Deportation Consequences

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
BY COURT ORDER
3:42
RICHARD W. WILSON
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

v.

CR 11 0097

CRB

CUONG MACH BINH TIEU, et al.,
a/k/a Steve Hak Se Wui, Ah Keung

DEFENDANT(S).

REDACTED

INDICTMENT

18 U.S.C. § 1962 (d)- RICO Conspiracy; 18 U.S.C. § 1962 (c)- RICO
21 U.S.C. § 846 - Conspiracy to Violate Controlled Substances Act
21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute, Distribution, and
Manufacture of Controlled Substance
21 U.S.C. § 841(c)(2) - Possession and Distribution of Listed Chemicals to
Manufacture a Controlled Substance; 18 U.S.C. § 892(a) -Extortionate Extension of
Credit Conspiracy; 18 U.S.C. § 892(a) - Extortionate Extension of Credit
18 U.S.C. § 894(a) -Collection of Credit by Extortionate Means Conspiracy
18 U.S.C. § 894(a) -Collection of Credit by Extortionate Means
Three Forfeiture Allegations

A true bill.

[Signature]

Foreman

Filed in open court this 29 day of

Feb 2011

[Signature]

Brenda Tolbert

Clerk

NO BAIL ARREST WARRANT

Bail, \$
[Signature]
Timothy J. Bommer
United States Magistrate Judge

1 MELINDA HAAG (CABN 132612)
2 United States Attorney

FILED
2011 FEB 23 BY COURT ORDER
SEAL
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

CRB

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CUONG MACH BINH TIEU,
15 a/k/a Steve, Hak Se Wui, Ah Keung,
16 LAP THE CHUNG,
17 a/k/a Lap Gor, Larry,
18 BOB YUEN,
19 a/k/a Ah Buk, Buk Fung Loh,

20 DING LIN,
21 a/k/a Jeffrey, Phi, Bald Headed Guy,
22 SKYLER CHANG,
23 a/k/a Long Hair,

24 CHEA BOU,
25 BAO HUNG PHUNG,
26 a/k/a Ah Bao, Monkey Face,

27 MAY CHUNG,
28 THANH THE CHU,
a/k/a Sai Sing,

HUNG TIEU,
a/k/a Dave, Ah Hung,

KWAI PING WONG,
a/k/a Sam,

JOHN HINYU CHEW,
BAO TRAN, and

BILLY KET CHAU,
a/k/a Tommy, Dei,

Defendants.

No. CR 11 0097

VIOLATIONS:

18 U.S.C. § 1962(d)—RICO Conspiracy

18 U.S.C. § 1962(c)—RICO

21 U.S.C. § 846—Conspiracy to Violate
Controlled Substances Act

21 U.S.C. § 841(a)(1)—Possession with
Intent to Distribute, Distribution, and
Manufacture of a Controlled Substance

21 U.S.C. § 841(c)(2)—Possession and
Distribution of Listed Chemical to
Manufacture a Controlled Substance

18 U.S.C. § 892(a)—Extortionate
Extension of Credit Conspiracy

18 U.S.C. § 892(a)—Extortionate
Extension of Credit

18 U.S.C. § 894(a)—Collection of Credit
by Extortionate Means Conspiracy

18 U.S.C. § 894(a)—Collection of Credit
by Extortionate Means

Three Forfeiture Allegations

INDICTMENT

1 INDICTMENT

2 The Grand Jury charges:

3 **Introductory Allegations**

4 1. At all times relevant to this indictment:

5 a. Oaks Card Club was located at 4097 San Pablo Avenue, Emeryville,
6 California.

7 b. Artichoke Joe's Casino was located at 659 Huntington Avenue, San
8 Bruno, California.

9 c. Collectively, they were "the casinos."

10 d. Each casino had an Asian gaming section where tables with banking
11 games such as pai gow tiles were assembled.

12 e. Each casino had a main cashier area where customers exchanged
13 chips and money. Additionally, each casino had a satellite podium which contained a set
14 of drawers in their Asian gaming sections where chips and cash were also exchanged
15 during legitimate operations at the casino.

16 COUNT ONE: (18 U.S.C. § 1962(d): Conspiracy to Conduct the Affairs of a
17 Racketeer-Influenced Corrupt Organization)

18 **The Racketeering Conspiracy**

19 2. From a time unknown to the Grand Jury, but no later than in or about
20 February 2008 until the date of the filing of this indictment, in the Northern District of
21 California and elsewhere,

22 **CUONG MACH BINH TIEU,**

23 **LAP THE CHUNG,**

24 **BOB YUEN,**

25 
26 **DING LIN,**

27 **SKYLER CHANG,**

28 **CHEA BOU,**

1 MAY CHUNG, and

2 HUNG TIEU,

3 defendants herein, together with other individuals known and unknown to the Grand Jury,
4 being persons employed by and associated with an enterprise as set forth below, which
5 was engaged in, and the activities of which affected, interstate and foreign commerce,
6 knowingly and intentionally conspired to conduct and participate, directly and indirectly,
7 in the conduct of the affairs of the below described enterprise through a pattern of
8 racketeering activity, as defined by Title 18, United States Code, Sections 1961(1) and
9 1961(5), consisting of racketeering acts one through twenty six as alleged below.

10 It was further part of the conspiracy that each defendant agreed that a conspirator
11 would commit at least two acts of racketeering activity in the conduct of the affairs of the
12 enterprise.

13 **The Racketeering Enterprise**

14 3. The enterprise, including its leadership, membership, and associates
15 constituted an "enterprise" as defined by Title 18, United States Code, Section 1961(4),
16 that is, a group of individuals associated in fact. The enterprise was engaged in, and its
17 activities affected, interstate and foreign commerce. The enterprise constituted an
18 ongoing organization whose members functioned as a continuing unit that had a common
19 purpose of achieving the objectives of the enterprise.

20 a. The defendants named above and their associates have used the
21 casinos' facilities and assets to enrich themselves through the extension and collection of
22 extortionate and unlawful credit ("loansharking"); and (2) manufacturing and distributing
23 illegal narcotics.

24 b. The defendants referred to the satellite drawers in the Asian gaming
25 sections of the casinos as the "kwei tungs," and commingled illegal profits from
26 loansharking and drug dealing with the legitimate casino funds otherwise found in the
27 "kwei tungs." Certain members of the conspiracy were able to access these "kwei tungs"
28 and the funds therein.

1 **Purposes of the Enterprise**

2 4. The purposes of the enterprise included the following:

3 a. Preserving and controlling the facilities of the casinos as a base of
4 criminal operations and a profit center for the enterprise.

5 b. Promoting and enhancing the enterprise and the activities of its
6 members and associates, including loansharking and drug dealing.

7 c. Keeping and maintaining a reputation for the use of extortionate
8 means, as that term is defined 18 U.S.C. § 891(7), to collect credit members of the
9 enterprise had extended.

10 d. Providing information, assistance, and support to members of the
11 enterprise to ensure its overall success, including avoiding the disruption of the enterprise
12 by law enforcement.

13 **Manners and Means of the Racketeering Conspiracy**

14 5. It was part of the racketeering conspiracy that various of the defendants
15 would enrich the enterprise and themselves by: (1) extending extortionate and unlawful
16 credit to gamblers and customers of the casinos; and (2) manufacturing and distributing
17 illegal narcotics.

18 a. *Loansharking*

19 Members of the conspiracy engaged in and facilitated the extension
20 and collection of extortionate credit and unlawful loans. Most of the conspirators who
21 extended loansharking loans (the "loansharks"), did not work for the casinos, but spent
22 substantial amounts of time at the casinos several days a week. The loansharks lent
23 money to customers and usually charged 10% interest per week on the extortionate loan
24 until the loan was paid back in full. The loansharks relied upon and were directly assisted
25 by casino employees in these endeavors. A loan obtained at one casino could be paid
26 back at the other. The loansharks used threats and their reputation for violence to ensure
27 repayment of the loans.

28 b. *Drug Dealing*

1 Certain members of the conspiracy engaged in the distribution of
2 illegal drugs. Members of the conspiracy who sold illegal drugs used funds maintained in
3 the kwei tung to purchase drugs and used the casinos' premises to facilitate their drug
4 trafficking activity.

5 6. Although the defendants referred to themselves as one family and the
6 enterprise worked collectively out of the Asian gaming sections of the two casinos, most
7 members of the enterprise primarily worked at and through one casino or the other.

8 **Roles of the Defendants**

9 7. The defendants performed various roles in conducting and participating,
10 directly and indirectly, in the conduct of the affairs of the enterprise, including but not
11 limited to the following:

12 a. **CUONG MACH BINH TIEU** was a member of the enterprise that
13 was not employed by either casino. He engaged in drug trafficking through both casinos.
14 **SKYLER CHANG** and **DING LIN** also were not employed by either casino. They
15 assisted **CUONG MACH BINH TIEU**'s drug trafficking and acted on behalf of and
16 under his direction.

17 b. *Defendants Primarily Working at and Through Oaks Card Club*

18 i. **LAP THE CHUNG** and **BOB YUEN** made and collected
19 extortionate and illegal loans at Oaks Card Club and directed others to do so. **LAP THE**
20 **CHUNG** also directed others to obtain, manufacture, sell, and distribute controlled
21 substances both at Oaks Card Club and elsewhere. **BOB YUEN** was not employed by
22 either casino, while **LAP THE CHUNG** was directly employed by Oaks Card Club as a
23 manager of the Asian gaming section.

24 ii. **MAY CHUNG** and **CHEA BOU** were employed by Oaks
25 Card Club as a chip runner and a card dealer, respectively. They facilitated racketeering
26 activities within Oaks Card Club such as providing gambling chips for extortionate and
27 illegal loans, accepted repayment of interest and principal on these loans, and, in **CHEA**
28 **BOU**'s case, distributed controlled substances. **MAY CHUNG** was **LAP THE**

1 CHUNG's sister. [REDACTED] worked with the enterprise by assisting BOB YUEN at
2 Oaks Card Club in extending and collecting extortionate and illegal debts.

3 c. *Defendants Primarily Working at and Through Artichoke Joe's*

4 DING LIN and HUNG TIEU worked with the enterprise at
5 Artichoke Joe's Casino extending and collecting extortionate and illegal debts. Neither
6 was employed by Artichoke Joe's Casino. HUNG TIEU was CUONG MACH BINH
7 TIEU's brother.

8 **Pattern of Racketeering Activity**

9 8. The pattern of racketeering activity through which the defendants CUONG
10 MACH BINH TIEU, LAP THE CHUNG, BOB YUEN, [REDACTED], DING LIN,
11 SKYLER CHANG, CHEA BOU, MAY CHUNG, HUNG TIEU, and others known
12 and unknown to the Grand Jury, agreed to conduct and participate, directly and indirectly,
13 in the conduct of the affairs of the enterprise, consisted of the acts set forth below:

14 Racketeering Act One

15 The defendants named below committed the following acts, either of which alone
16 constitutes the commission of Racketeering Act One:

17 (A) Between in or about February 2008 and in or about April 2008, in the Northern
18 District of California, CUONG MACH BINH TIEU, SKYLER CHANG, and others
19 known and unknown to the Grand Jury, knowingly and intentionally conspired to possess
20 with intent to distribute and to distribute a controlled substance, namely 50 grams or more
21 of methamphetamine, its salts, isomers, and salts of its isomers, and did aid and abet the
22 same, in violation of 21 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. § 2.

23 (B) Between in or about February 2008 and in or about April 2008, in the Northern
24 District of California, CUONG MACH BINH TIEU, SKYLER CHANG, and others
25 known and unknown to the Grand Jury, knowingly and intentionally possessed with intent
26 to distribute and distributed a controlled substance, namely 50 grams or more of
27 methamphetamine, its salts, isomers, and salts of its isomers, and did aid and abet the
28 same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

1 Racketeering Act Two

2 The defendants named below committed the following acts, any one of which
3 alone constitutes the commission of Racketeering Act Two:

4 (A) Between in or about March 2009 and in or about November 2009, in the Northern
5 District of California, **CUONG MACH BINH TIEU, SKYLER CHANG, DING LIN,**
6 and others known and unknown to the Grand Jury, knowingly and intentionally conspired
7 unlawfully to possess and distribute a listed chemical, namely ephedrine, knowing and
8 having reasonable cause to believe that the listed chemical would be used to manufacture
9 a controlled substance, namely methamphetamine, its salts, isomers, and salts of its
10 isomers, and did aid and abet the same, in violation of 21 U.S.C. §§ 846, 841(c)(2), and
11 18 U.S.C. § 2.

12 (B) Between in or about March 2009 and in or about November 2009, in the Northern
13 District of California, **CUONG MACH BINH TIEU, SKYLER CHANG, DING LIN,**
14 and others known and unknown to the Grand Jury, knowingly, intentionally, and
15 unlawfully possessed and distributed a listed chemical, namely ephedrine, knowing and
16 having reasonable cause to believe that the listed chemical would be used to manufacture
17 a controlled substance, namely methamphetamine, its salts, isomers, and salts of its
18 isomers, and did aid and abet the same, in violation of 21 U.S.C. § 841(c)(2) and 18
19 U.S.C. § 2.

20 (C) Between in or about March 2009 and in or about November 2009, in the Northern
21 District of California, **CUONG MACH BINH TIEU, SKYLER CHANG, DING LIN,**
22 and others known and unknown to the Grand Jury, knowingly and intentionally conspired
23 to manufacture a controlled substance, namely 50 grams or more of methamphetamine, its
24 salts, isomers, and salts of its isomers, and did aid and abet the same, in violation of 21
25 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. § 2.

26 (D) Between in or about March 2009 and in or about November 2009, in the Northern
27 District of California, **CUONG MACH BINH TIEU, SKYLER CHANG, DING LIN,**
28 and others known and unknown to the Grand Jury, knowingly and intentionally

1 manufactured a controlled substance, namely methamphetamine, its salts, isomers, and
2 salts of its isomers, and did aid and abet the same, in violation of 21 U.S.C. § 841(a)(1)
3 and 18 U.S.C. § 2.

4 Racketeering Act Three

5 On or about October 7, 2009, in the Northern District of California, **LAP THE**
6 **CHUNG** knowingly and intentionally possessed with intent to distribute and distributed a
7 controlled substance, namely 3,4-Methylenedioxymethamphetamine (hereafter
8 “MDMA”), in violation of 21 U.S.C. § 841(a)(1).

9 Racketeering Act Four

10 The defendants named below committed the following acts, either of which alone
11 constitutes the commission of Racketeering Act Four:

12 (A) On or about October 14, 2009, in the Northern District of California, **LAP THE**
13 **CHUNG, BOB YUEN, MAY CHUNG,** and [REDACTED] knowingly and intentionally
14 conspired to make an extortionate extension of credit, namely a \$5,000 loan at 10%
15 interest per week, wherein it was the understanding of the creditor(s) and the debtor at the
16 time the credit was extended that delay in making repayment or failure to make repayment
17 could result in the use of violence and other criminal means to cause harm to the person,
18 reputation, and property of any person, and did aid and abet the same, in violation of 18
19 U.S.C. §§ 892(a) and 2.

20 (B) On or about October 14, 2009, in the Northern District of California, **LAP THE**
21 **CHUNG, BOB YUEN, MAY CHUNG,** and [REDACTED] knowingly and intentionally
22 made an extortionate extension of credit, namely a \$5,000 loan at 10% interest per week,
23 wherein it was the understanding of the creditor(s) and the debtor at the time the credit
24 was extended that delay in making repayment or failure to make repayment could result in
25 the use of violence and other criminal means to cause harm to the person, reputation, and
26 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
27 and 2.

28 Racketeering Act Five

1 The defendants named below committed the following acts, either of which alone
2 constitutes the commission of Racketeering Act Five:

3 (A) On or about October 14, 2009, in the Northern District of California, **LAP THE**
4 **CHUNG** and **CHEA BOU** knowingly and intentionally conspired to possess with intent
5 to distribute and to distribute a controlled substance, namely MDMA, and did aid and
6 abet the same, in violation of 21 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. § 2.

7 (B) On or about October 14, 2009, in the Northern District of California, **LAP THE**
8 **CHUNG** and **CHEA BOU** knowingly and intentionally possessed with intent to
9 distribute and distributed a controlled substance, namely MDMA, and did aid and abet the
10 same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

11 Racketeering Act Six

12 The defendants named below committed the following acts, either of which alone
13 constitutes the commission of Racketeering Act Six:

14 (A) On or about October 20, 2009, in the Northern District of California, **BOB YUEN**
15 and **MAY CHUNG** knowingly and intentionally conspired to make an extortionate
16 extension of credit, namely a \$10,000 loan at 10% interest per week, wherein it was the
17 understanding of the creditor(s) and the debtor at the time the credit was extended that
18 delay in making repayment or failure to make repayment could result in the use of
19 violence and other criminal means to cause harm to the person, reputation, and property
20 of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

21 (B) On or about October 20, 2009, in the Northern District of California, **BOB YUEN**
22 and **MAY CHUNG** knowingly and intentionally made an extortionate extension of credit,
23 namely a \$10,000 loan at 10% interest per week, wherein it was the understanding of the
24 creditor(s) and the debtor at the time the credit was extended that delay in making
25 repayment or failure to make repayment could result in the use of violence and other
26 criminal means to cause harm to the person, reputation, and property of any person, and
27 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

28 Racketeering Act Seven

1 The defendants named below committed the following acts, either of which alone
2 constitutes the commission of Racketeering Act Seven:

3 (A) On or about October 20, 2009, in the Northern District of California, **LAP THE**
4 **CHUNG** and **CHEA BOU** knowingly and intentionally conspired to possess with intent
5 to distribute and to distribute a controlled substance, namely MDMA, and did aid and
6 abet the same, in violation of 21 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. §2.

7 (B) On or about October 20, 2009, in the Northern District of California, **LAP THE**
8 **CHUNG** and **CHEA BOU** knowingly and intentionally possessed with intent to
9 distribute and distributed a controlled substance, namely MDMA, and did aid and abet the
10 same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

11 Racketeering Act Eight

12 On or about January 13, 2010, in the Northern District of California, **LAP THE**
13 **CHUNG** knowingly and intentionally possessed with intent to distribute and distributed a
14 controlled substance, namely MDMA, in violation of 21 U.S.C. § 841(a)(1).

15 Racketeering Act Nine

16 The defendants named below committed the following acts, either of which alone
17 constitutes the commission of Racketeering Act Nine:

18 (A) On or about January 14, 2010, in the Northern District of California, **HUNG TIEU**
19 and an Artichoke Joe's Casino employee knowingly and intentionally conspired to make
20 an extortionate extension of credit, namely a \$5,000 loan at 10% interest per week,
21 wherein it was the understanding of the creditor(s) and the debtor at the time the credit
22 was extended that delay in making repayment or failure to make repayment could result in
23 the use of violence and other criminal means to cause harm to the person, reputation, and
24 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
25 and 2.

26 (B) On or about January 14, 2010, in the Northern District of California, **HUNG TIEU**
27 and an Artichoke Joe's Casino employee knowingly and intentionally made an
28 extortionate extension of credit, namely a \$5,000 loan at 10% interest per week, wherein

1 it was the understanding of the creditor(s) and the debtor at the time the credit was
2 extended that delay in making repayment or failure to make repayment could result in the
3 use of violence and other criminal means to cause harm to the person, reputation, and
4 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
5 and 2.

6 Racketeering Act Ten

7 The defendant named below committed the following acts, either of which alone
8 constitutes the commission of Racketeering Act Ten:

9 (A) Between in or about February 2010 and in or about April 2010, within the Northern
10 District of California, **CUONG MACH BINH TIEU** and others known and unknown to
11 the Grand Jury knowingly and intentionally conspired to possess with intent to distribute
12 and to distribute a controlled substance, namely 5 kilograms or more of cocaine, its salts,
13 isomers, and salts of its isomers, and did aid and abet the same, in violation of 21 U.S.C.
14 §§ 846, 841(a)(1), and 18 U.S.C. § 2.

15 (B) Between in or about February 2010 and in or about April 2010, within the Northern
16 District of California, **CUONG MACH BINH TIEU** and others known and unknown to
17 the Grand Jury knowingly and intentionally possessed with intent to distribute and
18 distributed a controlled substance, namely 500 grams or more of cocaine, its salts,
19 isomers, and salts of its isomers, and did aid and abet the same, in violation of 21 U.S.C.
20 § 841(a)(1) and 18 U.S.C. § 2.

21 Racketeering Act Eleven

22 The defendants named below committed the following acts, either of which alone
23 constitutes the commission of Racketeering Act Eleven:

24 (A) On or about February 1, 2010, in the Northern District of California, **HUNG TIEU**
25 and two Artichoke Joe's Casino employees knowingly and intentionally conspired to
26 make an extortionate extension of credit, namely a \$5,000 loan at 10% interest per week,
27 wherein it was the understanding of the creditor(s) and the debtor at the time the credit
28 was extended that delay in making repayment or failure to make repayment could result in

1 the use of violence and other criminal means to cause harm to the person, reputation, and
2 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
3 and 2.

4 (B) On or about February 1, 2010, in the Northern District of California, **HUNG TIEU**
5 and two Artichoke Joe's Casino employees knowingly and intentionally made an
6 extortionate extension of credit, namely a \$5,000 loan at 10% interest per week, wherein
7 it was the understanding of the creditor(s) and the debtor at the time the credit was
8 extended that delay in making repayment or failure to make repayment could result in the
9 use of violence and other criminal means to cause harm to the person, reputation, and
10 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
11 and 2.

12 Racketeering Act Twelve

13 The defendants named below committed the following acts, either of which alone
14 constitutes the commission of Racketeering Act Twelve:

15 (A) On or about February 4, 2010, in the Northern District of California, **HUNG TIEU**
16 and an Artichoke Joe's Casino employee knowingly and intentionally conspired to make
17 an extortionate extension of credit, namely a \$5,000 loan at 10% interest per week,
18 wherein it was the understanding of the creditor(s) and the debtor at the time the credit
19 was extended that delay in making repayment or failure to make repayment could result in
20 the use of violence and other criminal means to cause harm to the person, reputation, and
21 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
22 and 2.

23 (B) On or about February 4, 2010, in the Northern District of California, **HUNG TIEU**
24 and an Artichoke Joe's Casino employee knowingly and intentionally made an
25 extortionate extension of credit, namely a \$5,000 loan at 10% interest per week, wherein
26 it was the understanding of the creditor(s) and the debtor at the time the credit was
27 extended that delay in making repayment or failure to make repayment could result in the
28 use of violence and other criminal means to cause harm to the person, reputation, and

1 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
2 and 2.

3 Racketeering Act Thirteen

4 On or about March 18, 2010, in the Northern District of California, **CHEA BOU**
5 knowingly and intentionally possessed with intent to distribute and distributed a
6 controlled substance, namely MDMA, in violation of 21 U.S.C. § 841(a)(1).

7 Racketeering Act Fourteen

8 The defendants named below committed the following acts, either of which alone
9 constitutes the commission of Racketeering Act Fourteen:

10 (A) On or about April 29, 2010, in the Northern District of California, **LAP THE**
11 **CHUNG** and **BOB YUEN** knowingly and intentionally conspired to make an
12 extortionate extension of credit, namely a \$3,000 loan at 5% interest per day, wherein it
13 was the understanding of the creditor(s) and the debtor at the time the credit was extended
14 that delay in making repayment or failure to make repayment could result in the use of
15 violence and other criminal means to cause harm to the person, reputation, and property
16 of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

17 (B) On or about April 29, 2010, in the Northern District of California, **LAP THE**
18 **CHUNG** and **BOB YUEN** knowingly and intentionally made an extortionate extension
19 of credit, namely a \$3,000 loan at 5% interest per day, wherein it was the understanding
20 of the creditor(s) and the debtor at the time the credit was extended that delay in making
21 repayment or failure to make repayment could result in the use of violence and other
22 criminal means to cause harm to the person, reputation, and property of any person, and
23 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

24 Racketeering Act Fifteen

25 On or about May 13, 2010, in the Northern District of California, **BOB YUEN**
26 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
27 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
28 debtor at the time the credit was extended that delay in making repayment or failure to

1 make repayment could result in the use of violence and other criminal means to cause
2 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
3 892(a).

4 Racketeering Act Sixteen

5 The defendants named below committed the following acts, either of which alone
6 constitutes the commission of Racketeering Act Sixteen:

7 (A) On or about May 20, 2010, in the Northern District of California, **MAY CHUNG**,
8 **BOB YUEN**, and an Oaks Card Club employee knowingly and intentionally conspired to
9 make an extortionate extension of credit, namely a \$3,000 loan at 10% interest per week,
10 wherein it was the understanding of the creditor(s) and the debtor at the time the credit
11 was extended that delay in making repayment or failure to make repayment could result in
12 the use of violence and other criminal means to cause harm to the person, reputation, and
13 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
14 and 2.

15 (B) On or about May 20, 2010, in the Northern District of California, **MAY CHUNG**,
16 **BOB YUEN**, and an Oaks Card Club employee knowingly and intentionally made an
17 extortionate extension of credit, namely a \$3,000 loan at 10% interest per week, wherein
18 it was the understanding of the creditor(s) and the debtor at the time the credit was
19 extended that delay in making repayment or failure to make repayment could result in the
20 use of violence and other criminal means to cause harm to the person, reputation, and
21 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
22 and 2.

23 Racketeering Act Seventeen

24 The defendants named below committed the following acts, either of which alone
25 constitutes the commission of Racketeering Act Seventeen:

26 (A) On or about June 3, 2010, in the Northern District of California, **DING LIN** and an
27 Artichoke Joe's Casino employee knowingly and intentionally conspired to make an
28 extortionate extension of credit, namely a \$3,000 loan at 10% interest per week, wherein

1 it was the understanding of the creditor(s) and the debtor at the time the credit was
2 extended that delay in making repayment or failure to make repayment could result in the
3 use of violence and other criminal means to cause harm to the person, reputation, and
4 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
5 and 2.

6 (B) On or about June 3, 2010, in the Northern District of California, **DING LIN** and an
7 Artichoke Joe's Casino employee knowingly and intentionally made an extortionate
8 extension of credit, namely a \$3,000 loan at 10% interest per week, wherein it was the
9 understanding of the creditor(s) and the debtor at the time the credit was extended that
10 delay in making repayment or failure to make repayment could result in the use of
11 violence and other criminal means to cause harm to the person, reputation, and property
12 of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

13 Racketeering Act Eighteen

14 On or about June 8, 2010, in the Northern District of California, **CHEA BOU**
15 knowingly and intentionally possessed with intent to distribute and distributed a
16 controlled substance, namely N-Benzylpiperazine ("BZP"), in violation of 21 U.S.C. §
17 841(a)(1).

18 Racketeering Act Nineteen

19 The defendants named below committed the following acts, either of which alone
20 constitutes the commission of Racketeering Act Nineteen:

21 (A) On or about June 23, 2010, in the Northern District of California, **HUNG TIEU** and
22 an Artichoke Joe's Casino employee knowingly and intentionally conspired to make an
23 extortionate extension of credit, namely a \$2,000 loan at 10% interest per week, wherein
24 it was the understanding of the creditor(s) and the debtor at the time the credit was
25 extended that delay in making repayment or failure to make repayment could result in the
26 use of violence and other criminal means to cause harm to the person, reputation, and
27 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
28 and 2.

1 (B) On or about June 23, 2010, in the Northern District of California, **HUNG TIEU** and
2 an Artichoke Joe's Casino employee knowingly and intentionally made an extortionate
3 extension of credit, namely a \$2,000 loan at 10% interest per week, wherein it was the
4 understanding of the creditor(s) and the debtor at the time the credit was extended that
5 delay in making repayment or failure to make repayment could result in the use of
6 violence and other criminal means to cause harm to the person, reputation, and property
7 of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

8 Racketeering Act Twenty

9 On or about July 29, 2010, in the Northern District of California, **BOB YUEN**
10 knowingly and intentionally made an extortionate extension of credit, namely a \$10,000
11 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
12 debtor at the time the credit was extended that delay in making repayment or failure to
13 make repayment could result in the use of violence and other criminal means to cause
14 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
15 892(a).

16 Racketeering Act Twenty One

17 On or about August 2, 2010, in the Northern District of California, **BOB YUEN**
18 knowingly and intentionally made an extortionate extension of credit, namely two
19 \$10,000 loans at 10% interest per week, for a total of \$20,000 in loaned money, wherein
20 it was the understanding of the creditor(s) and the debtor at the time the credit was
21 extended that delay in making repayment or failure to make repayment could result in the
22 use of violence and other criminal means to cause harm to the person, reputation, and
23 property of any person, in violation of 18 U.S.C. § 892(a).

24 Racketeering Act Twenty Two

25 The defendants named below committed the following acts, either of which alone
26 constitutes the commission of Racketeering Act Twenty Two:

27 (A) On or about August 3, 2010, in the Northern District of California, **DING LIN** and
28 an Artichoke Joe's Casino employee knowingly and intentionally conspired to make an

1 extortionate extension of credit, namely a \$5,000 loan at 10% interest per week, wherein
2 it was the understanding of the creditor(s) and the debtor at the time the credit was
3 extended that delay in making repayment or failure to make repayment could result in the
4 use of violence and other criminal means to cause harm to the person, reputation, and
5 property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a)
6 and 2.

7 (B) On or about August 3, 2010, in the Northern District of California, **DING LIN** and
8 an Artichoke Joe's Casino employee knowingly and intentionally made an extortionate
9 extension of credit, namely a \$5,000 loan at 10% interest per week, wherein it was the
10 understanding of the creditor(s) and the debtor at the time the credit was extended that
11 delay in making repayment or failure to make repayment could result in the use of
12 violence and other criminal means to cause harm to the person, reputation, and property
13 of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

14 Racketeering Act Twenty Three

15 On or about August 24, 2010, in the Northern District of California, **BOB YUEN**
16 knowingly and intentionally made an extortionate extension of credit, namely a \$10,000
17 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
18 debtor at the time the credit was extended that delay in making repayment or failure to
19 make repayment could result in the use of violence and other criminal means to cause
20 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
21 892(a).

22 Racketeering Act Twenty Four

23 On or about August 30, 2010, in the Northern District of California, **DING LIN**
24 knowingly and intentionally made an extortionate extension of credit, namely a \$1,000
25 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
26 debtor at the time the credit was extended that delay in making repayment or failure to
27 make repayment could result in the use of violence and other criminal means to cause
28 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §

1 892(a).

2 Racketeering Act Twenty Five

3 Between in or about August 2010 and continuing until the date of the filing of this
4 indictment, in the Northern District of California, BOB YUEN and [REDACTED]
5 knowingly and intentionally conspired to and did participate in the use of extortionate
6 means to collect and attempt to collect extensions of credit, namely two \$10,000 loans at
7 10% interest per week, for a total of \$20,000 in loaned money, as described more fully
8 above in Racketeering Act Twenty One, and did aid and abet the same, in violation of 18
9 U.S.C. §§ 894(a) and 2.

10 Racketeering Act Twenty Six

11 Between in or about August 2010 and continuing until the date of the filing of this
12 indictment, in the Northern District of California, DING LIN knowingly and
13 intentionally participated in the use of extortionate means to collect and attempt to collect
14 an extension of credit, namely a \$5,000 loan at 10% interest per week, as described more
15 fully above in Racketeering Act Twenty Two, in violation of 18 U.S.C. § 894(a).

16 All in violation of 18 U.S.C. §§ 1962(d).

17
18 COUNT TWO: (18 U.S.C. § 1962(c): Conducting the Affairs of a Racketeer-
19 Influenced Corrupt Organization)

20 1. The allegations contained in paragraphs One, and Three through Seven of
21 Count One of this indictment are realleged in this Count and are incorporated by
22 reference as if fully set forth herein.

23 2. From a time unknown to the Grand Jury, but no later than in or about
24 February 2008 until the date of the filing of this indictment, in the Northern District of
25 California and elsewhere,

26 CUONG MACH BINH TIEU,

27 LAP THE CHUNG,

28 BOB YUEN,

1 [REDACTED]
2 DING LIN,
3 SKYLER CHANG,
4 CHEA BOU,
5 MAY CHUNG, and
6 HUNG TIEU,

7 defendants herein, together with other individuals known and unknown to the Grand Jury,
8 being persons employed by and associated with the enterprise described in paragraphs
9 One, and Three through Seven of Count One, which was engaged in, and the activities of
10 which affected, interstate and foreign commerce, knowingly and intentionally conducted
11 and participated, directly and indirectly, in the conduct of the affairs of the above
12 described enterprise through a pattern of racketeering activity as defined by Title 18,
13 United States Code, Sections 1961(1) and 1961(5), that is, through the commission of
14 racketeering acts One through Twenty Six as set forth in paragraph 8 of Count One
15 above.

16 All in violation of 18 U.S.C. §§ 1962(c).

17
18 COUNT THREE: (21 U.S.C. § 846: Conspiracy to Violate the Controlled Substances
19 Act)

20 Between in or about February 2008 and in or about April 2008, within the
21 Northern District of California,

22 CUONG MACH BINH TIEU,
23 SKYLER CHANG,

24 and others known and unknown to the Grand Jury, knowingly and intentionally conspired
25 to possess with intent to distribute and to distribute a controlled substance, namely 50
26 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and did
27 aid and abet the same, in violation of 21 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. § 2.
28

1 COUNT FOUR: (21 U.S.C. § 841(a)(1): Possession with Intent to Distribute and
2 Distribution of a Controlled Substance)

3 Between in or about February 2008 and in or about April 2008, within the
4 Northern District of California,

5 **CUONG MACH BINH TIEU,**
6 **SKYLER CHANG,**

7 and others known and unknown to the Grand Jury, knowingly and intentionally possessed
8 with intent to distribute and distributed a controlled substance, namely 50 grams or more
9 of methamphetamine, its salts, isomers, and salts of its isomers, and did aid and abet the
10 same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

11
12 COUNT FIVE: (21 U.S.C. § 846: Conspiracy to Violate the Controlled Substances
13 Act)

14 Between in or about March 2009 and in or about November 2009, in the Northern
15 District of California,

16 **CUONG MACH BINH TIEU,**
17 **SKYLER CHANG,**

18 **DING LIN,**

19 and others known and unknown to the Grand Jury, knowingly and intentionally conspired
20 unlawfully to possess and distribute a listed chemical, namely ephedrine, knowing and
21 having reasonable cause to believe that the listed chemical would be used to manufacture
22 a controlled substance, namely methamphetamine, its salts, isomers, and salts of its
23 isomers, and did aid and abet the same, in violation of 21 U.S.C. §§ 846, 841(c)(2), and
24 18 U.S.C. § 2.

25
26 COUNT SIX: (21 U.S.C. § 841(c)(2): Possession and Distribution of Listed
27 Chemical to Manufacture a Controlled Substance)

28 Between in or about March 2009 and in or about November 2009, in the Northern

1 District of California,

2 **CUONG MACH BINH TIEU,**

3 **SKYLER CHANG,**

4 **DING LIN,**

5 and others known and unknown to the Grand Jury, knowingly, intentionally, and
6 unlawfully possessed and distributed a listed chemical, namely ephedrine, knowing and
7 having reasonable cause to believe that the listed chemical would be used to manufacture
8 a controlled substance, namely methamphetamine, its salts, isomers, and salts of its
9 isomers, and did aid and abet the same, in violation of 21 U.S.C. § 841(c)(2) and 18
10 U.S.C. §2.

11
12 COUNT SEVEN: (21 U.S.C. § 846: Conspiracy to Violate the Controlled Substances
13 Act)

14 Between in or about March 2009 and in or about November 2009, in the Northern
15 District of California,

16 **CUONG MACH BINH TIEU,**

17 **SKYLER CHANG,**

18 **DING LIN,**

19 and others known and unknown to the Grand Jury, knowingly and intentionally conspired
20 to manufacture a controlled substance, namely 50 grams or more of methamphetamine, its
21 salts, isomers, and salts of its isomers, and did aid and abet the same, in violation of 21
22 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. § 2.

23
24 COUNT EIGHT: (21 U.S.C. § 841(a)(1): Manufacture of a Controlled Substance)

25 Between in or about March 2009 and in or about November 2009, in the Northern
26 District of California,

27 **CUONG MACH BINH TIEU,**

28 **SKYLER CHANG,**

1 **DING LIN,**

2 and others known and unknown to the Grand Jury, knowingly and intentionally
3 manufactured a controlled substance, namely methamphetamine, its salts, isomers, and
4 salts of its isomers, and did aid and abet the same, in violation of 21 U.S.C. § 841(a)(1)
5 and 18 U.S.C. § 2.

6
7 COUNT NINE: (21 U.S.C. § 841(a)(1): Possession with Intent to Distribute and
8 Distribution of a Controlled Substance)

9 On or about October 7, 2009, in the Northern District of California,

10 **LAP THE CHUNG**

11 knowingly and intentionally possessed with intent to distribute and distributed a
12 controlled substance, namely MDMA, in violation of 21 U.S.C. § 841(a)(1).


13
14 COUNT TEN: (18 U.S.C. §.892(a): Extortionate Extension of Credit Conspiracy)

15 On or about October 14, 2009, in the Northern District of California,

16 **LAP THE CHUNG,**

17 **BOB YUEN,**

18 **MAY CHUNG, and**

19 
20 knowingly and intentionally conspired to make an extortionate extension of credit,
21 namely a \$5,000 loan at 10% interest per week, wherein it was the understanding of the
22 creditor(s) and the debtor at the time the credit was extended that delay in making
23 repayment or failure to make repayment could result in the use of violence and other
24 criminal means to cause harm to the person, reputation, and property of any person, and
25 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

26
27 COUNT ELEVEN: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

28 On or about October 14, 2009, in the Northern District of California,

1 **LAP THE CHUNG,**
2 **BOB YUEN,**
3 **MAY CHUNG, and**

4 **[REDACTED]**

5 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
6 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
7 debtor at the time the credit was extended that delay in making repayment or failure to
8 make repayment could result in the use of violence and other criminal means to cause
9 harm to the person, reputation, and property of any person, and did aid and abet the same,
10 in violation of 18 U.S.C. §§ 892(a) and 2.

11
12 COUNT TWELVE: (21 U.S.C. § 846: Conspiracy to Violate the Controlled Substances
13 Act)

14 On or about October 14, 2009, in the Northern District of California,

15 **LAP THE CHUNG and**
16 **CHEA BOU**

17 knowingly and intentionally conspired to possess with intent to distribute and to distribute
18 a controlled substance, namely MDMA, and did aid and abet the same, in violation of 21
19 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. § 2.

20
21 COUNT THIRTEEN: (21 U.S.C. § 841(a)(1): Possession with Intent to Distribute
22 and Distribution of a Controlled Substance)

23 On or about October 14, 2009, in the Northern District of California,

24 **LAP THE CHUNG and**
25 **CHEA BOU**

26 knowingly and intentionally possessed with intent to distribute and distributed a
27 controlled substance, namely MDMA, and did aid and abet the same, in violation of 21
28 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

1 COUNT FOURTEEN: (18 U.S.C. § 892(a): Extortionate Extension of Credit
2 Conspiracy)

3 On or about October 20, 2009, in the Northern District of California,

4 **BOB YUEN** and

5 **MAY CHUNG**

6 knowingly and intentionally conspired to make an extortionate extension of credit,
7 namely a \$10,000 loan at 10% interest per week, wherein it was the understanding of the
8 creditor(s) and the debtor at the time the credit was extended that delay in making
9 repayment or failure to make repayment could result in the use of violence and other
10 criminal means to cause harm to the person, reputation, and property of any person, and
11 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

12
13 COUNT FIFTEEN: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

14 On or about October 20, 2009, in the Northern District of California,

15 **BOB YUEN** and

16 **MAY CHUNG**

17 knowingly and intentionally made an extortionate extension of credit, namely a \$10,000
18 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
19 debtor at the time the credit was extended that delay in making repayment or failure to
20 make repayment could result in the use of violence and other criminal means to cause
21 harm to the person, reputation, and property of any person, and did aid and abet the same,
22 in violation of 18 U.S.C. §§ 892(a) and 2.

23
24 COUNT SIXTEEN: (21 U.S.C. § 846: Conspiracy to Violate the Controlled
25 Substances Act)

26 On or about October 20, 2009, in the Northern District of California,

27 **LAP THE CHUNG** and

28 **CHEA BOU**

1 knowingly and intentionally conspired to possess with intent to distribute and to distribute
2 a controlled substance, namely MDMA, and did aid and abet the same, in violation of 21
3 U.S.C. §§ 846, 841(a)(1), and 18 U.S.C. § 2.

4
5 COUNT SEVENTEEN: (21 U.S.C. § 841(a)(1): Possession with Intent to Distribute
6 and Distribution of a Controlled Substance)

7 On or about October 20, 2009, in the Northern District of California,

8 **LAP THE CHUNG** and

9 **CHEA BOU**

10 knowingly and intentionally possessed with intent to distribute and distributed a
11 controlled substance, namely MDMA, and did aid and abet the same, in violation of 21
12 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

13
14 COUNT EIGHTEEN: (21 U.S.C. § 841(a)(1): Possession with Intent to Distribute
15 and Distribution of a Controlled Substance)

16 On or about January 13, 2010, in the Northern District of California,

17 **LAP THE CHUNG**

18 knowingly and intentionally possessed with intent to distribute and distributed a
19 controlled substance, namely MDMA, in violation of 21 U.S.C. § 841(a)(1).

20
21 COUNT NINETEEN: (18 U.S.C. § 892(a): Extortionate Extension of Credit
22 Conspiracy)

23 On or about January 14, 2010, in the Northern District of California,

24 **HUNG TIEU** and

25 **KWAI WONG**

26 knowingly and intentionally conspired to make an extortionate extension of credit,
27 namely a \$5,000 loan at 10% interest per week, wherein it was the understanding of the
28 creditor(s) and the debtor at the time the credit was extended that delay in making

1 repayment or failure to make repayment could result in the use of violence and other
2 criminal means to cause harm to the person, reputation, and property of any person, and
3 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

4
5 COUNT TWENTY: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

6 On or about January 14, 2010, in the Northern District of California,

7 **HUNG TIEU** and

8 **KWAI WONG**

9 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
10 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
11 debtor at the time the credit was extended that delay in making repayment or failure to
12 make repayment could result in the use of violence and other criminal means to cause
13 harm to the person, reputation, and property of any person, and did aid and abet the same,
14 in violation of 18 U.S.C. §§ 892(a) and 2.

15
16 COUNT TWENTY ONE: (21 U.S.C. § 846: Conspiracy to Violate the Controlled
17 Substances Act)

18 Between in or about February 2010 and in or about April 2010, within the
19 Northern District of California,

20 **CUONG MACH BINH TIEU**

21 and others known and unknown to the Grand Jury knowingly and intentionally conspired
22 to possess with intent to distribute and to distribute a controlled substance; namely 5
23 kilograms or more of cocaine, and did aid and abet the same, in violation of 21 U.S.C. §§
24 846, 841(a)(1), and 18 U.S.C. § 2.

25
26 COUNT TWENTY TWO: (21 U.S.C. § 841(a)(1): Possession with Intent to Distribute
27 and Distribution of a Controlled Substance)

28 Between in or about February 2010 and in or about April 2010, within the

1 Northern District of California,

2 **CUONG MACH BINH TIEU**

3 and others known and unknown to the Grand Jury knowingly and intentionally possessed
4 with intent to distribute and distributed a controlled substance, namely 500 grams or more
5 of cocaine, and did aid and abet the same, in violation of 21 U.S.C. § 841(a)(1) and 18
6 U.S.C. § 2.

7
8 COUNT TWENTY THREE: (18 U.S.C. § 892(a): Extortionate Extension of Credit
9 Conspiracy)

10 On or about February 1, 2010, in the Northern District of California,

11 **HUNG TIEU,**

12 **BAO TRAN, and**

13 **JOHN CHEW**

14 knowingly and intentionally conspired to make an extortionate extension of credit,
15 namely a \$5,000 loan at 10% interest per week, wherein it was the understanding of the
16 creditor(s) and the debtor at the time the credit was extended that delay in making
17 repayment or failure to make repayment could result in the use of violence and other
18 criminal means to cause harm to the person, reputation, and property of any person, and
19 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

20
21 COUNT TWENTY FOUR: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

22 On or about February 1, 2010, in the Northern District of California,

23 **HUNG TIEU,**

24 **BAO TRAN, and**

25 **JOHN CHEW**

26 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
27 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
28 debtor at the time the credit was extended that delay in making repayment or failure to

1 make repayment could result in the use of violence and other criminal means to cause
2 harm to the person, reputation, and property of any person, and did aid and abet the same,
3 in violation of 18 U.S.C. §§ 892(a) and 2.

4
5 COUNT TWENTY FIVE: (18 U.S.C. § 892(a): Extortionate Extension of Credit
6 Conspiracy)

7 On or about February 4, 2010, in the Northern District of California,

8 **HUNG TIEU and**

9 **BAO TRAN**

10 knowingly and intentionally conspired to make an extortionate extension of credit,
11 namely a \$5,000 loan at 10% interest per week, wherein it was the understanding of the
12 creditor(s) and the debtor at the time the credit was extended that delay in making
13 repayment or failure to make repayment could result in the use of violence and other
14 criminal means to cause harm to the person, reputation, and property of any person, and
15 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

16
17 COUNT TWENTY SIX: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

18 On or about February 4, 2010, in the Northern District of California,

19 **HUNG TIEU and**

20 **BAO TRAN**

21 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
22 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
23 debtor at the time the credit was extended that delay in making repayment or failure to
24 make repayment could result in the use of violence and other criminal means to cause
25 harm to the person, reputation, and property of any person, and did aid and abet the same,
26 in violation of 18 U.S.C. §§ 892(a) and 2.

27
28 COUNT TWENTY SEVEN: (21 U.S.C. § 841(a)(1): Possession with Intent to

Distribute and Distribution of a Controlled Substance)

On or about March 18, 2010, in the Northern District of California,

CHEA BOU

knowingly and intentionally possessed with intent to distribute and distributed a controlled substance, namely MDMA, in violation of 21 U.S.C. § 841(a)(1).

COUNT TWENTY EIGHT: (18 U.S.C. § 892(a): Extortionate Extension of Credit Conspiracy)

On or about April 29, 2010, in the Northern District of California,

LAP THE CHUNG and

BOB YUEN

knowingly and intentionally conspired to make an extortionate extension of credit, namely a \$3,000 loan at 5% interest per day, wherein it was the understanding of the creditor(s) and the debtor at the time the credit was extended that delay in making repayment or failure to make repayment could result in the use of violence and other criminal means to cause harm to the person, reputation, and property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

COUNT TWENTY NINE: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

On or about April 29, 2010, in the Northern District of California,

LAP THE CHUNG and

BOB YUEN

knowingly and intentionally made an extortionate extension of credit, namely a \$3,000 loan at 5% interest per day, wherein it was the understanding of the creditor(s) and the debtor at the time the credit was extended that delay in making repayment or failure to make repayment could result in the use of violence and other criminal means to cause harm to the person, reputation, and property of any person, and did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

1 COUNT THIRTY: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

2 On or about May 13, 2010, in the Northern District of California,

3 **BOB YUEN**

4 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
5 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
6 debtor at the time the credit was extended that delay in making repayment or failure to
7 make repayment could result in the use of violence and other criminal means to cause
8 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
9 892(a).

10
11 COUNT THIRTY ONE: (18 U.S.C. § 892(a): Extortionate Extension of Credit
12 Conspiracy)

13 On or about May 20, 2010, in the Northern District of California,

14 **THANH CHU,**

15 **MAY CHUNG, and**

16 **BOB YUEN**

17 knowingly and intentionally conspired to make an extortionate extension of credit,
18 namely a \$3,000 loan at 10% interest per week, wherein it was the understanding of the
19 creditor(s) and the debtor at the time the credit was extended that delay in making
20 repayment or failure to make repayment could result in the use of violence and other
21 criminal means to cause harm to the person, reputation, and property of any person, and
22 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

23
24 COUNT THIRTY TWO: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

25 On or about May 20, 2010, in the Northern District of California,

26 **THANH CHU,**

27 **MAY CHUNG, and**

28 **BOB YUEN**

1 knowingly and intentionally made an extortionate extension of credit, namely a \$3,000
2 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
3 debtor at the time the credit was extended that delay in making repayment or failure to
4 make repayment could result in the use of violence and other criminal means to cause
5 harm to the person, reputation, and property of any person, and did aid and abet the same,
6 in violation of 18 U.S.C. §§ 892(a) and 2.

7
8 COUNT THIRTY THREE: (18 U.S.C. § 892(a): Extortionate Extension of Credit
9 Conspiracy)

10 On or about June 3, 2010, in the Northern District of California,

11 **DING LIN** and

12 **KWAI WONG**

13 knowingly and intentionally conspired to make an extortionate extension of credit,
14 namely a \$3,000 loan at 10% interest per week, wherein it was the understanding of the
15 creditor(s) and the debtor at the time the credit was extended that delay in making
16 repayment or failure to make repayment could result in the use of violence and other
17 criminal means to cause harm to the person, reputation, and property of any person, and
18 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

19
20 COUNT THIRTY FOUR: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

21 On or about June 3, 2010, in the Northern District of California,

22 **DING LIN** and

23 **KWAI WONG**

24 knowingly and intentionally made an extortionate extension of credit, namely a \$3,000
25 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
26 debtor at the time the credit was extended that delay in making repayment or failure to
27 make repayment could result in the use of violence and other criminal means to cause
28 harm to the person, reputation, and property of any person, and did aid and abet the same,

1 in violation of 18 U.S.C. §§ 892(a) and 2.

2
3 COUNT THIRTY FIVE: (21 U.S.C. § 841(a)(1): Possession with Intent to Distribute
4 and Distribution of a Controlled Substance)

5 On or about June 8, 2010, in the Northern District of California,

6 **CHEA BOU**

7 knowingly and intentionally possessed with intent to distribute and distributed a
8 controlled substance, namely N-Benzylpiperazine (“BZP”), in violation of 21 U.S.C. §
9 841(a)(1).

10
11 COUNT THIRTY SIX: (18 U.S.C. § 892(a): Extortionate Extension of Credit
12 Conspiracy)

13 On or about June 23, 2010, in the Northern District of California,

14 **HUNG TIEU and**

15 **KWAI WONG**

16 knowingly and intentionally conspired to make an extortionate extension of credit,
17 namely a \$2,000 loan at 10% interest per week, wherein it was the understanding of the
18 creditor(s) and the debtor at the time the credit was extended that delay in making
19 repayment or failure to make repayment could result in the use of violence and other
20 criminal means to cause harm to the person, reputation, and property of any person, and
21 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

22
23 COUNT THIRTY SEVEN: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

24 On or about June 23, 2010, in the Northern District of California,

25 **HUNG TIEU and**

26 **KWAI WONG**

27 knowingly and intentionally made an extortionate extension of credit, namely a \$2,000
28 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the

1 debtor at the time the credit was extended that delay in making repayment or failure to
2 make repayment could result in the use of violence and other criminal means to cause
3 harm to the person, reputation, and property of any person, and did aid and abet the same,
4 in violation of 18 U.S.C. §§ 892(a) and 2.

5
6 COUNT THIRTY EIGHT: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

7 On or about July 29, 2010, in the Northern District of California,

8 **BOB YUEN**

9 knowingly and intentionally made an extortionate extension of credit, namely a \$10,000
10 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
11 debtor at the time the credit was extended that delay in making repayment or failure to
12 make repayment could result in the use of violence and other criminal means to cause
13 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
14 892(a).

15
16 COUNT THIRTY NINE: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

17 On or about August 2, 2010, in the Northern District of California,

18 **BOB YUEN**

19 knowingly and intentionally made an extortionate extension of credit, namely two
20 \$10,000 loans at 10% interest per week, for a total of \$20,000 in loaned money, wherein
21 it was the understanding of the creditor(s) and the debtor at the time the credit was
22 extended that delay in making repayment or failure to make repayment could result in the
23 use of violence and other criminal means to cause harm to the person, reputation, and
24 property of any person, in violation of 18 U.S.C. § 892(a).

25
26 COUNT FORTY: (18 U.S.C. § 892(a): Extortionate Extension of Credit Conspiracy)

27 On or about August 3, 2010, in the Northern District of California,

28 **DING LIN and**

JOHN CHEW

1
2 knowingly and intentionally conspired to make an extortionate extension of credit,
3 namely a \$5,000 loan at 10% interest per week, wherein it was the understanding of the
4 creditor(s) and the debtor at the time the credit was extended that delay in making
5 repayment or failure to make repayment could result in the use of violence and other
6 criminal means to cause harm to the person, reputation, and property of any person, and
7 did aid and abet the same, in violation of 18 U.S.C. §§ 892(a) and 2.

8
9 COUNT FORTY ONE: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

10 On or about August 3, 2010, in the Northern District of California,

11 **DING LIN** and

12 **JOHN CHEW**

13 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
14 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
15 debtor at the time the credit was extended that delay in making repayment or failure to
16 make repayment could result in the use of violence and other criminal means to cause
17 harm to the person, reputation, and property of any person, and did aid and abet the same,
18 in violation of 18 U.S.C. §§ 892(a) and 2.

19
20 COUNT FORTY TWO: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

21 On or about August 24, 2010, in the Northern District of California,

22 **BOB YUEN**

23 knowingly and intentionally made an extortionate extension of credit, namely a \$10,000
24 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
25 debtor at the time the credit was extended that delay in making repayment or failure to
26 make repayment could result in the use of violence and other criminal means to cause
27 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
28 892(a).

1 COUNT FORTY THREE: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

2 On or about August 24, 2010, in the Northern District of California,

3 **BAO PHUNG**

4 knowingly and intentionally made an extortionate extension of credit, namely a \$5,000
5 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
6 debtor at the time the credit was extended that delay in making repayment or failure to
7 make repayment could result in the use of violence and other criminal means to cause
8 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
9 892(a).

10
11 COUNT FORTY FOUR: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

12 On or about August 26, 2010, in the Northern District of California,

13 **BILLY KET CHAU**

14 knowingly and intentionally made an extortionate extension of credit, namely a \$3,000
15 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
16 debtor at the time the credit was extended that delay in making repayment or failure to
17 make repayment could result in the use of violence and other criminal means to cause
18 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §
19 892(a).

20
21 COUNT FORTY FIVE: (18 U.S.C. § 892(a): Extortionate Extension of Credit)

22 On or about August 30, 2010, in the Northern District of California,

23 **DING LIN**


24 knowingly and intentionally made an extortionate extension of credit, namely a \$1,000
25 loan at 10% interest per week, wherein it was the understanding of the creditor(s) and the
26 debtor at the time the credit was extended that delay in making repayment or failure to
27 make repayment could result in the use of violence and other criminal means to cause
28 harm to the person, reputation, and property of any person, in violation of 18 U.S.C. §

1 892(a).

2
3 COUNT FORTY SIX: (18 U.S.C. § 894(a): Collection of Credit by Extortionate
4 Means Conspiracy)

5 Between in or about August 2010 and continuing until the date of the filing of this
6 indictment, in the Northern District of California,


7 **BOB YUEN and**

8 
9 knowingly and intentionally conspired to participate in the use of extortionate means to
10 collect and attempt to collect extensions of credit, namely two \$10,000 loans at 10%
11 interest per week, for a total of \$20,000 in loaned money, as described more fully above
12 in Count Thirty Nine, and did aid and abet the same, in violation of 18 U.S.C. §§ 894(a)
13 and 2.

14
15 COUNT FORTY SEVEN: (18 U.S.C. § 894(a): Collection of Credit by Extortionate
16 Means)

17 Between in or about August 2010 and continuing until the date of the filing of this
18 indictment, in the Northern District of California,

19 **BOB YUEN and**

20 
21 knowingly and intentionally participated in the use of extortionate means to collect and
22 attempt to collect extensions of credit, namely two \$10,000 loans at 10% interest per
23 week, for a total of \$20,000 in loaned money, as described more fully above in Count
24 Thirty Nine, and did aid and abet the same, in violation of 18 U.S.C. §§ 894(a) and 2.

25
26 COUNT FORTY EIGHT: (18 U.S.C. § 894(a): Collection of Credit by Extortionate
27 Means)

28 Between in or about August 2010 and continuing until the date of the filing of this

1 indictment, in the Northern District of California,

2 **DING LIN**

3 knowingly and intentionally participated in the use of extortionate means to collect and
4 attempt to collect an extension of credit, namely a \$5,000 loan at 10% interest per week,
5 as described more fully above in Count Forty One, in violation of 18 U.S.C. § 894(a).

6
7 FIRST FORFEITURE ALLEGATION: (18 U.S.C. § 1963: Proceeds and Property
8 Involved in RICO)


9 1. The allegations contained in Counts One and Two of this Indictment are
10 hereby realleged and incorporated by reference for the purpose of alleging forfeitures
11 pursuant Title 18, United States Code, Section 1963.

12 2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of
13 an offense in violation of Title 18, United States Code, Section 1962, the defendants,

14 **CUONG MACH BINH TIEU,**

15 **LAP THE CHUNG,**

16 **BOB YUEN,**

17 
18 **DING LIN,**

19 **SKYLER CHANG,**

20 **CHEA BOU,**

21 **MAY CHUNG, and**

22 **HUNG TIEU**

23 shall forfeit to the United States of America:

- 24 a. any interest acquired and maintained in violation of section 1962;
25 b. any interest in, security of, claim against, and property and
26 contractual right of any kind affording a source of influence over, any enterprise which
27 the defendants established, operated, controlled, conducted, and participated in the
28 conduct of, in violation of section 1962; and

1 c. any property constituting, and derived from, any proceeds obtained,
2 directly and indirectly, from racketeering activity and unlawful debt collection in
3 violation of 1962.

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

- 6 a. cannot be located upon the exercise of due diligence;
- 7 b. has been transferred or sold to, or deposited with, a 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 divided
11 without difficulty,

12 the United States of America shall be entitled to forfeiture of substitute property pursuant
13 to Title 18, United States Code, Section 1963(m).

14
15 SECOND FORFEITURE ALLEGATION: (21 U.S.C. § 853: Drug Forfeiture)

16 1. The factual allegations contained in Counts One and Two of this indictment
17 are realleged and by this reference fully incorporated herein for the purpose of alleging
18 forfeiture pursuant to the provisions of 21 U.S.C. §§ 853(a)(1) and (2).

19 2. Upon conviction of one and more of the controlled substance offenses
20 alleged in Counts Three, Four, Five, Six, Seven, Eight, Nine, Eleven, Twelve, Fourteen,
21 Fifteen, Sixteen, Eighteen, Nineteen, Twenty Two, and Twenty Seven of this indictment,
22 the defendants,

23 **CUONG MACH BINH TIEU,**

24 **LAP THE CHUNG,**

25 **DING LIN,**

26 **SKYLER CHANG, and**

27 **CHEA BOU**

28 shall forfeit to the United States all right, title, and interest in property constituting, and

1 derived from any proceeds, defendants obtained, directly and indirectly, as a result of said
2 violations, and any property used and intended to be used, in any manner and part, to
3 commit, and to facilitate the commission of the said violations.

- 4 3. If, as a result of any act and omission of the defendants, any of said property
5 a. cannot be located upon the exercise of due diligence;
6 b. has been transferred or sold to or deposited with, a third person;
7 c. has been placed beyond the jurisdiction of the Court;
8 d. has been substantially diminished in value; or
9 e. has been commingled with other property which cannot be divided
10 without difficulty;

11 any and all interest defendants have in any other property (not to exceed the value of the
12 above forfeitable property) shall be forfeited to the United States.

13 All pursuant to 21 U.S.C. §§ 853(a)(1) and (2), (p) and Rule 32.2 of the Federal
14 Rules of Criminal Procedure.

15
16 THIRD FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) & 28 U.S.C. § 2461:
17 Extortionate Credit Transactions Proceeds)

18 1. The allegations contained in Counts One and Two of this indictment are
19 hereby realleged and incorporated by reference for the purpose of alleging forfeitures
20 pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
21 Code, Section 2461(c).

22 2. Upon conviction of one or more of the extortionate credit offenses in
23 violation of Title 18, United States Code, Sections 892 and 894 set forth in Counts Ten,
24 Thirteen, Seventeen, Twenty, Twenty One, Twenty Three, Twenty Four, Twenty Five,
25 Twenty Six, Twenty Eight, Twenty Nine, Thirty, Thirty One, Thirty Two, Thirty Three,
26 Thirty Four, Thirty Five, Thirty Six, and Thirty Seven of this indictment, the defendants,

27 **LAP THE CHUNG,**

28 **BOB YUEN,**

[REDACTED]

DING LIN,
BAO PHUNG,
MAY CHUNG,
THANH CHU,
HUNG TIEU,
KWAI WONG,
JOHN CHEW,
BAO TRAN, and
BILLY KET CHAU

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real and personal, which constitutes and is derived from proceeds traceable to the offenses.

3. If any of the property described above, as a result of any act and 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); and Rule 32.2

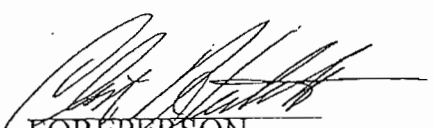
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1 of the Federal Rules of Criminal Procedure.

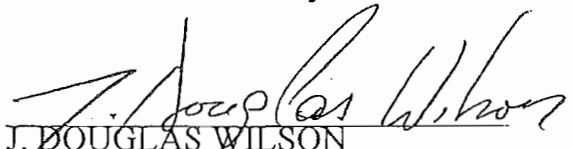
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DATED: *February 24, 2011*

A TRUE BILL.


FOREPERSON

MELINDA HAAG
United States Attorney


J. DOUGLAS WILSON
Deputy Chief, Criminal Division

(Approved as to form: )
AUSA REES
AUSA WEGNER
AUSA FRENTZEN