

SA CR 07-

1
I N D I C E M E N T
2

3 [21 U.S.C. § 846:
4 Conspiracy to Distribute
Methamphetamine, MDMA, and

M na, 21 U.S.C. § 841(a):
a Distribution of MDMA; and 18
r U.S.C. § 1956(h): Conspiracy
i to Launder Monetary
j Instruments; 18 U.S.C. § 2:
u Aiding and Abetting]
a
)

5
The Grand Jury charges:

6

7

8

9

CRL:crl

10

COUNT ONE

11

[21 U.S.C. § 846]

12

A. OBJECTS OF THE CONSPIRACY

13

Beginning on a date unknown to the Grand Jury and continuing

14

to on or about October 15, 2007, in Orange County, within the

15

Central District of California, and elsewhere, defendants MINH

16

TAN LE, also known as (a.k.a.) "Tan," ("MINH LE"), THAI PHI DO,

17

a.k.a. "Tommy," a.k.a. "Tony" ("THAI DO"), LUAN NGUYEN, a.k.a.

18

"Loni," a.k.a. "Lonely" ("LUAN NGUYEN"), VINH HOANG TRAN, a.k.a.

19

"Junior" ("VINH TRAN"), TRANG THUY NGUYEN, a.k.a. "Moon" ("TRANG

20

NGUYEN"), TRUONG LAM NGO, a.k.a. "Lam" ("TRUONG NGO"), JOSHUA LEE

21

CLARK, a.k.a. "Mr. J." ("CLARK"), and JINFANG WANG ("WANG") and

22

others known and unknown to the Grand Jury, knowingly and

23

intentionally conspired and agreed with each other to:

24

(1) knowingly and intentionally distribute 500 grams or more

25

of a mixture or substance containing a detectable amount of

26

27

28

methamphetamine, approximately 8,910 grams, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1);

42) knowingly and intentionally distribute approximately 25,000 grams of a mixture or substance containing a detectable amount of 3,4-methylenedioxymethamphetamine (also known as "MDMA"), a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and

93) knowingly and intentionally distribute a mixture or substance containing a detectable amount of marijuana, less than 50 kilograms, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished in substance as follows:

17 Defendant THAI DO would purchase MDMA, methamphetamine, and marijuana from defendant MINH LE, a resident of Canada, who would make arrangements with defendant THAI DO for the delivery of the drugs to drug buyers residing in the United States and Australia.

22 Defendant LUAN NGUYEN would purchase MDMA and marijuana from defendants THAI DO and MINH LE and would redistribute the drugs to other drug buyers.

25 Defendant VINH TRAN would assist defendant LUAN NGUYEN to distribute drugs.

27

28

4. Defendant TRANG NGUYEN would assist defendant Thai DO to distribute drugs, collect the proceeds of drug sales, and delivered drug proceeds to money couriers.

5. Defendant TRUONG NGO, a resident of Australia, would purchase methamphetamine from defendant THAI DO and would arrange for the delivery of the methamphetamine in Australia for redistribution.

8. Defendant CLARK would purchase from defendants LUAN NGUYEN and THAI DO marijuana and would sell to LUAN NGUYEN marijuana.

11. Defendant WANG would pick-up MDMA pills from defendant TRANG NGUYEN.

C. OVERT ACTS

14 furtherance of the conspiracy and to accomplish the objects of the conspiracy, on or about the following dates, defendants MINH LE, THAI DO, LUAN NGUYEN, VINH TRAN, TRANG NGUYEN, TRUONG NGO, CLARK, and WANG and other co-conspirators known and unknown to the Grand Jury, committed various overt acts within the Central District of California and elsewhere, including but not limited to, the following:

31 On or about May 10, 2006, defendants LUAN NGUYEN and VINH TRAN caused a third party to transport approximately 35,000 MDMA pills from Orange County, California, to Minnesota.

24 On or about December 4, 2006, defendant THAI DO told defendant LUAN NGUYEN that THAI DO expected to receive 60,000 MDMA pills and gave defendant LUAN NGUYEN instructions on the

distribution of the pills.

20. On or about December 5, 2006, defendant THAI DO told defendant LUAN NGUYEN that THAI DO expected to receive 100,000 MDMA pills and needed defendant's LUAN NGUYEN's assistance in storing the pills.

21. On or about December 6, 2006, in Westminster, California, defendant CLARK delivered suspected marijuana to defendant LUAN NGUYEN.

22. On or about December 17, 2006, defendants LUAN NGUYEN and CLARK discussed the delivery of marijuana to CLARK.

23. On or about December 17, 2006, defendant CLARK went to the residence of defendant LUAN NGUYEN, in Westminster, California, and backed his vehicle into the gated area of LUAN NGUYEN's driveway.

24. On or about December 17, 2006, defendant LUAN NGUYEN spoke with defendant MINH LE about the marijuana transaction with defendant CLARK.

25. On or about December 18, 2006, defendant THAI DO asked defendant LUAN NGUYEN if LUAN NGUYEN wanted to buy marijuana from defendant THAI DO.

26. On or about December 19, 2006, defendants LUAN NGUYEN and MINH LE discussed the marijuana transaction proposed by defendant THAI DO during the December 18th telephone conversation and defendant LUAN NGUYEN agreed to assist defendants MINH LE and THAI DO to distribute the marijuana.

27. On or about December 22, 2006, defendant CLARK agreed

27

28

to meet with defendant LUAN NGUYEN to pick-up drugs.

18. On or about December 28, 2006, defendant VINH TRAN told defendant LUAN NGUYEN that he was on his way to pick-up drugs.

49. On or about January 30, 2007, defendant LUAN NGUYEN told defendant VIHN TRAN that defendant LUAN NGUYEN was returning drugs to "Chau."

20. In March 2007, defendants THAI DO, MINH LE, and TRUONG NGO arranged for the shipment of methamphetamine from Vancouver, Canada, to defendant TRUONG NGO in Sidney, Australia.

20. Between March 23, 2007, and April 5, 2007, defendants THAI DO and MINH LE sent to Sidney, Australia, approximately 8,910 grams of methamphetamine.

22. On or about May 11, 2007, defendants THAI DO and MINH LE discussed the distribution of drugs in Australia and the collection of proceeds from drug sales.

26. On or about May 12, 2007, defendant MINH LE told defendant THAI DO to expect a person to call THAI DO to arrange for the pick-up of 20,000 MDMA pills.

29. On or about May 14, 2007, defendant THAI DO told defendant TRANG NGUYEN that a person would contact her to pick-up MDMA from defendant TRANG NGUYEN.

25. On or about May 15, 2007, defendant TRANG NGUYEN delivered approximately 20,000 MDMA pills to defendant WANG.

24. On or about May 15, 2007, defendant THAI DO called defendant MINH LE and confirmed that the 20,000 MDMA pills had been delivered.

27

28

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

COUNT TWO

17

[18 U.S.C. § 1956(h)]

A. OBJECTS OF THE CONSPIRACY

18 Beginning on a date unknown and continuing until on or about
19 October 15, 2007, in Orange County, within the Central District
20 of California, and elsewhere, defendants MINH TAN LE, also known
21 as (a.k.a.) "Tan," ("MINH LE"), THAI PHI DO, a.k.a. "Tommy,"
22 a.k.a. "Tony" ("THAI DO"), TRANG THUY NGUYEN, a.k.a. "Moon"
23 ("TRANG NGUYEN"), HUY ICH NGUYEN, a.k.a. "Uncle Huy" ("HUY
24 NGUYEN"), MARCO ANTONIO GARCIA, a.k.a. "Seca," a.k.a. "Soca," and
25 other
26 known and unknown to the Grand Jury, knowingly and

27

28

intentionally conspired and agreed with each other to conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions would involve the proceeds of specified unlawful activity, that is, a violation of 21 U.S.C. § 856, conspiracy to distribute controlled substances, knowing the transaction is designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of said proceeds, and that while conducting and attempting to conduct such financial transactions, defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B).

13

14

15

16

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished in substance as follows:

21 Defendant THAI DO would purchase MDMA, methamphetamine, and marijuana from defendant MINH LE, a resident of Canada, who would make arrangements with defendant THAI DO for the delivery of the drugs to drug buyers residing in the United States and Australia.

26 Defendant MINH LE would arrange for defendant THAI DO

27

28

to deliver to defendant GARCIA large quantities of U.S. currency representing the proceeds of drug sales.

3. Defendant TRANG NGUYEN would assist defendant THAI DO to collect the proceeds of drug sales and deliver drug proceeds to money couriers.

4. Defendant GARCIA would meet with defendant TRANG NGUYEN to receive large quantities of U.S. currency representing the proceeds of drug sales.

9. Defendants HUY NGUYEN would receive from defendant THAI DO proceeds from drug sales and would invest those funds in a business known as The Orchid Depot, located in Los Angeles, California.

C. OVERT ACTS

14 furtherance of the conspiracy, and to accomplish the objects of conspiracy, defendants MINH LE, THAI DO, TRANG NGUYEN, HUY NGUYEN, GARCIA, and others co-conspirators known and unknown to the Grand Jury, committed the following over acts, among others within the Central District of California and elsewhere:

19 The allegations in paragraphs eight through twenty-six in count one of the indictment are realleged as if set forth in full here.

22 On or about May 12, 2007, defendants MINH LE and THAI DO arranged for defendant GARCIA to pick-up drug proceeds in THAI DO's possession.

25 On or about May 12, 2007, defendant GARCIA called defendant THAI DO and arranged to pick-up drug proceeds.

27

28

9. On or about May 12, 2007, in Westminster, California, defendant TRANG NGUYEN met with defendant GARCIA and delivered drug proceeds.

40. On or about May 18, 2007, defendant THAI DO arranged for defendant TRANG NGUYEN to deliver to defendant GARCIA drug proceeds.

71. On or about May 18, 2007, in Westminster, California, defendant TRANG NGUYEN met with defendant GARCIA and delivered to GARCIA drug proceeds.

10. On or about May 22, 2007, defendant THAI DO instructed defendant TRANG NGUYEN to deliver to defendant GARCIA drug proceeds.

13. On or about May 23, 2007, in Westminster, California defendant TRANG NGUYEN met with defendant GARCIA and delivered to GARCIA drug proceeds.

14. On or about June 5, 2007, defendants THAI DO and HUY NGUYEN opened a business joint account, in the name of "Orchid Depot" at First Vietnamese American Bank, in Westminster, California, account number xxxx3680 (the "Orchid Account") and deposited approximately \$30,000.00 representing drug proceeds.

15. On or about June 1, 2007, in Fontana, California, defendant GARCIA met with a co-conspirator and delivered approximately \$754,410.00 in U.S. currency to the co-conspirator.

14. On or about June 15, 2007, in Fontana, California, defendant GARCIA met with a co-conspirator and delivered approximately \$199,870.00 in U.S. currency to the co-conspirator.

17. On or about June 28, 2007, in Fontana, California, defendant GARCIA met with a co-conspirator and delivered approximately \$1,147,285.00 in U.S. currency to the co-conspirator.

18. On or about October 7, 2007, defendant HUY NGUYEN met with a co-conspirator, in Westminster, California, and received approximately \$59,400.000 in U.S. currency which belonged to defendant THAI DO.

19. On or about October 7, 2007, defendant HUY NGUYEN called defendant THAI DO and notified THAI DO that the police seized THAI DO's money.

12

13

14

15

16

17

18

19

20

COUNT THREE

21

[21 U.S.C. § 841(a)]

22 or about May 10, 2006, in Los Angeles County, within the Central District of California, and elsewhere, defendants LUAN NGUYEN and VINH HOANG TRAN, a.k.a. "Junior," knowingly and intentionally distributed approximately 10,000 grams of a mixture or substance containing a detectable amount of 3,4-

27

28

methylenedioxymethamphetamine (also known as "MDMA"), a schedule I controlled substance.

3

4

A TRUE BILL

5

6

Foreperson

7

8

9

THOMAS P. O'BRIEN
United States Attorney

11

CHRISTINE C. EWELL
Assistant United States Attorney
Chief, Criminal Division

13

ROBB ADKINS
Assistant United States Attorney
Chief, Santa Ana Branch Office

16

17

18

19

20

21

22

23

24

25

26

27

28