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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 **-oOo-**

11 UNITED STATES OF AMERICA, )  
12 Plaintiff, )  
13 v. )  
14 XU CHAOFAN, )  
15 (also known as HUI YAT FAI), )  
16 XU GUOJUN, )  
17 (also known as HUI KIT SHUN), )  
18 KUANG WAN FANG, )  
(also known as WENDY KUANG), )  
19 YU YING YI, and )  
20 KWONG WA PO, )  
Defendants. )

**SECOND SUPERSEDING  
INDICTMENT**

**2:02-CR-0674-PMP(LRL)**

- 18 U.S.C. § 1962(d), RICO Conspiracy
- 18 U.S.C. § 1956(h), Money Laundering  
Conspiracy
- 18 U.S.C. § 371, Conspiracy to Transport  
Stolen Moneys
- 18 U.S.C. § 1546(a), Visa Fraud
- 18 U.S.C. § 1542, Passport Fraud
- 18 U.S.C. § 2, Aiding and Abetting

21 **THAT GRAND JURY CHARGES THAT:**

22 At all times relevant to this Indictment:

23 **SUMMARY OF VIOLATIONS**

- 24 Count 1: RICO Conspiracy, in violation of 18 U.S.C. § 1962(d); all defendants;
- 25 Count 2: Money Laundering Conspiracy, in violation of 18 U.S.C. § 1956(h);
- 26 all defendants;
- 27 Count 3: Conspiracy to Transport Stolen Moneys, in violation of 18 U.S.C. § 371;
- 28 all defendants;

1 Counts 4-6: Use of a Fraudulently Obtained Visa, in violation of 18 U.S.C.  
2 §§ 1546(a) and 2; defendant XU CHAOFAN;

3 Counts 7-9: Use of a Fraudulently Obtained Visa, in violation of 18 U.S.C.  
4 §§ 1546(a) and 2; defendant XU GUOJUN;

5 Counts 10-12: Use of a Fraudulently Obtained Passport, in violation of  
6 18 U.S.C. §§ 1542 and 2; defendant KUANG WAN FANG; and

7 Counts 13-15: Use of a Fraudulently Obtained Passport, in violation of  
8 18 U.S.C. §§ 1542 and 2; defendant YU YING YI.

9 **COUNT ONE**  
10 (The Racketeering Conspiracy)

11 **General Allegations**

12 1. The Bank of China (the "Bank") was a financial institution operating primarily in  
13 the People's Republic of China ("China"). The Bank had various sub-branch offices located  
14 throughout China, the Hong Kong Special Administrative Region ("Hong Kong"), and Macau,  
15 including a sub-branch in Kaiping, Guangdong, China (the "Kaiping Sub-Branch").

16 2. Defendant XU CHAOFAN, also known as HUI YAT FAI, was a citizen of China.  
17 At various times material to this Indictment, defendant XU CHAOFAN was an employee at  
18 various sub-branches of the Bank, including the Kaiping Sub-Branch. At various times material  
19 to this Indictment, defendant XU CHAOFAN held management positions at the Bank.

20 3. Defendant XU GUOJUN, also known as HUI KIT SHUN, was a citizen of China.  
21 At various times material to this Indictment, defendant XU GUOJUN was an employee at various  
22 sub-branches of the Bank, including the Kaiping Sub-Branch. At various times material to this  
23 Indictment, defendant XU GUOJUN held management positions at the Bank.

24 4. On or about April 30, 1985, defendants XU GUOJUN and YU YING YI, also a  
25 citizen of China at that time, were married in Kaiping, Guangdong, China.



1 Limited; Zhong Hui (Hong Kong) Limited; and various associated,  
2 subsidiary, and related business entities.

3 8. The Enterprise constituted an ongoing organization whose members functioned as  
4 a continuing unit for a common purpose of achieving the objectives of the Enterprise.

5 **The Purposes of the Enterprise**

6 9. The purposes of the Enterprise included the following:

7 a. Enriching the members and associates of the Enterprise through, among  
8 other things, fraud, money laundering, and foreign and interstate transfers of funds; and

9 b. Enabling the members and associates of the Enterprise, through marriage,  
10 passport, and visa fraud, to travel, among other countries, between China, Hong Kong, and the  
11 United States, and to flee China and Hong Kong in the event that the criminal activity of the  
12 Enterprise was discovered.

13 **The Racketeering Conspiracy**

14 10. From in or about 1991, to on or about October 6, 2004, in the District of Nevada  
15 and elsewhere,

16 XU CHAOFAN,  
17 XU GUOJUN,  
18 KUANG WAN FANG,  
19 YU YING YI, and  
20 KWONG WA PO,

21 defendants herein, together with persons known and unknown, being persons employed by and  
22 associated with the Enterprise described above, which was engaged in, and the activities of which  
23 affected, interstate and foreign commerce, knowingly and intentionally conspired to violate  
24 Title 18, United States Code, Section 1962(c); that is, to conduct and participate, directly and  
25 indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity  
26 as that term is defined in Title 18, United States Code, Sections 1961(1) and (5).

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1 **The Pattern of Racketeering Activity**

2 11. The pattern of racketeering activity consisted of multiple acts indictable under the  
3 laws of the United States, namely:

- 4 a. 18 U.S.C. § 1957(a) (engaging in monetary transactions);  
5 b. 18 U.S.C. § 2314 (transportation of stolen moneys);  
6 c. 18 U.S.C. § 1542 (passport fraud); and  
7 d. 18 U.S.C. § 1546(a) (visa fraud).

8 12. It was part of the conspiracy that the defendants agreed that a conspirator would  
9 commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

10 **Means and Methods of the RICO Conspiracy**

11 13. Among the means and methods by which the defendants and their associates  
12 conducted and participated in the conduct of the affairs of the Enterprise were the following:

13 a. Members of the Enterprise and their associates used their positions at the  
14 Bank to obtain money through a scheme to defraud the Bank. Through this scheme, members of  
15 the Enterprise and their associates obtained at least \$485 million from the Bank through numerous  
16 wire transfers of funds, use of facsimile transmissions, telegrams, checks, and cash.

17 b. Members of the Enterprise and their associates used numerous legal entities  
18 established in China and Hong Kong for the unlawful transfers of funds from the Bank.

19 c. Members of the Enterprise and their associates transported, transmitted, or  
20 transferred to the United States and from state to state in the United States funds which were  
21 stolen, converted or obtained through the fraudulent scheme.

22 d. Members of the Enterprise and their associates conducted or caused to be  
23 conducted numerous monetary transactions including, but not limited to: wire transfers, deposits,  
24 and withdrawals in various business accounts, personal accounts, and casino credit accounts  
25 located in the United States, Canada, and elsewhere, as well as casino transactions in Las Vegas,  
26 Nevada, and elsewhere.

1 e. Members of the Enterprise and their associates obtained documents from  
2 the Chinese government under false names and used those fraudulent documents to obtain false  
3 identification and travel documents from Hong Kong.

4 f. Members of the Enterprise and their associates used false identification and  
5 travel documents from Hong Kong to obtain United States visas from a United States Consulate  
6 in China.

7 g. Members of the Enterprise and their associates created and caused the  
8 creation of false marriage and divorce records, and altered and caused the destruction of valid  
9 marriage records, maintained by the Chinese government.

10 h. Members of the Enterprise and their associates arranged and entered into  
11 fraudulent marriages with citizens of the United States and filed false documents with authorities  
12 in the United States to gain entry into the United States, to gain permanent resident status in the  
13 United States, and in some cases, eventually, citizenship in the United States and United States  
14 passports based on their fraudulent marital status.

15 I. Members of the Enterprise and their associates used falsely obtained  
16 documents, made false statements, and caused others to make false statements to the United States  
17 Immigration and Naturalization Service, the United States Department of State, and various state  
18 courts in the United States, to illegally enter and remain in the District of Nevada and other places  
19 in the United States.

20 All in violation of Title 18, United States Code, Section 1962(d).

21 **COUNT TWO**  
22 (Money Laundering Conspiracy)

23 14. The Grand Jury incorporates by reference paragraphs 1 to 6 as though fully restated  
24 and realleged herein.

25 15. From in or about 1998, to and on or about October 6, 2004, in the District of  
26 Nevada and elsewhere,

1 XU CHAOFAN,  
2 XU GUOJUN,  
3 KUANG WAN FANG,  
4 YU YING YI, and  
5 KWONG WA PO,

6 defendants herein, together with persons known and unknown, conspired to knowingly engage and  
7 attempt to engage and cause to engage and attempt to engage, in monetary transactions by, through  
8 and to a financial institution, affecting interstate and foreign commerce, in criminally derived  
9 property of a value greater than ten thousand dollars (\$10,000), including, but not limited to, wire  
10 transfers, deposits, withdrawals and casino transactions, such property having been derived from  
11 a specified unlawful activity, that is, fraud, and a scheme and attempt to defraud, against a foreign  
12 bank (as defined in paragraph 7 of section 1(b) of the International Banking Act of 1978), in  
13 violation of Title 18, United States Code, Section 1957(a).

14 **Means and Methods of the Money Laundering Conspiracy**

15 16. Among the means and methods by which the defendants and their associates sought  
16 to accomplish the objects of the conspiracy were the following:

17 a. Defendants and their associates conducted or caused to be conducted  
18 numerous monetary transactions including, but not limited to: wire transfers, deposits, and  
19 withdrawals in various business accounts, personal accounts, and casino credit accounts located  
20 in the United States, Canada, and elsewhere, as well as casino transactions in Las Vegas, Nevada,  
21 and elsewhere.

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

23 **COUNT THREE**

24 (Conspiracy to Transport Stolen Moneys)

25 17. The Grand Jury incorporates by reference paragraphs 1 through 6 as though fully  
26 restated and realleged herein.

27 18. From in or about 1998, to and on or about October 6, 2004, in the District of  
28 Nevada and elsewhere,

1 XU CHAOFAN,  
2 XU GUOJUN,  
3 KUANG WAN FANG,  
4 YU YING YI, and  
5 KWONG WA PO,

6 defendants herein, together with persons known and unknown, knowingly and willfully conspired  
7 to transport, transmit, and transfer, and cause to be transported, transmitted and transferred, in  
8 interstate and foreign commerce, any securities and money, of the value of \$5,000 or more,  
9 knowing the same to have been stolen, converted and taken by fraud, in violation of Title 18,  
10 United States Code, Section 2314.

11 **Means and Methods of the Conspiracy to Transport Stolen Moneys**

12 19. Among the means and methods by which the defendants and their associates sought  
13 to accomplish the objects of the conspiracy were the following:

14 a. Defendants and their associates transported, transmitted, or transferred or  
15 caused to be transported, transmitted, or transferred, from outside the United States to the United  
16 States and within the United States, funds which were stolen, converted or obtained through the  
17 fraudulent scheme.

18 **Overt Acts in the Conspiracy to Transport Stolen Moneys**

19 20. In furtherance of the conspiracy and to effect the illegal objects thereof defendants  
20 committed the following overt acts, among others, in the District of Nevada and elsewhere:

21 a. Cash deposit by KUANG WAN FANG at Paris Las Vegas, Las Vegas,  
22 Nevada, in the amount of approximately \$50,000 on or about October 10, 2000;

23 b. Cash deposit by YU YING YI at Paris Las Vegas, Las Vegas, Nevada,  
24 in the amount of approximately \$80,000 on or about October 10, 2000;

25 c. Cash purchase of chips by XU GUOJUN at Treasure Island, Las Vegas,  
26 Nevada, in the amount of approximately \$12,000 on or about November 7, 2000; and

27 d. Deposit of four (4) checks totaling approximately \$2 million in the name  
28 of KWONG WA PO at the Hong Kong office of the RIO Suite Hotel and Casino on or about April  
29 27, 2001.

1 e. Personal check issued to Caesars Palace Hotel and Casino in Las Vegas,  
2 Nevada, in the amount of approximately \$1 million, drawn on the Bank of America checking  
3 account (Account No. 004961720373), in the name HUI Yat Fai, dated May 7, 2001.

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

5 **COUNTS FOUR TO SIX**  
6 (Use of a Fraudulently Obtained Visa)

7 21. On or about the dates enumerated below, in the District of Nevada, defendant **XU**  
8 **CHAOFAN**, together with other individuals, known and unknown, aiding and abetting  
9 one another, knowingly uttered, used, attempted to use, and possessed, and caused to be uttered,  
10 used, attempted to be used, and possessed, a non-immigrant visa for entry into and as evidence of  
11 an authorized stay in the United States, knowing it to have been procured by means of any false  
12 claim or statement, and to have been otherwise procured by fraud and unlawfully obtained; that  
13 is, on or about the dates enumerated below, XU CHAOFAN knowing uttered, used, attempted to  
14 use, and possessed United States visas issued in the name of HUI YAT FAI on or about September  
15 20, 2000, and January 19, 2001, knowing said visas to have been procured by means of false  
16 claims, false statements, and fraud for the purposes of entering into and as evidence of an  
17 authorized stay in the United States, all in violation of Title 18, United States Code, Sections  
18 1546(a) and 2.

COUNT	DATE
4	October 4, 2000
5	October 2, 2001
6	October 15, 2001

22 **COUNTS SEVEN TO NINE**  
23 (Use of a Fraudulently Obtained Visa)

24 22. On or about the dates enumerated below, in the District of Nevada, defendant **XU**  
25 **GUOJUN**, together with other individuals, known and unknown, aiding and abetting one another,  
26 knowingly uttered, used, attempted to use, and possessed, and caused to be uttered, used,  
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1 attempted to be used, and possessed, a non-immigrant visa for entry into and as evidence of an  
2 authorized stay in the United States, knowing it to have been procured by means of any false claim  
3 or statement, and to have been otherwise procured by fraud and unlawfully obtained; that is, on  
4 or about the dates enumerated below, XU GUOJUN knowing uttered, used, attempted to use, and  
5 possessed United States visas issued in the name of HUI KIT SHUN on or about September 20,  
6 2000, and January 19, 2001, knowing said visas to have been procured by means of false claims,  
7 false statements, and fraud for the purposes of entering into and as evidence of an authorized stay  
8 in the United States, all in violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT	DATE
7	October 6, 2000
8	October 2, 2001
9	October 15, 2001

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13 **COUNTS TEN TO TWELVE**  
14 (Use of a Fraudulently Obtained Passport)

15 23. On or about the dates enumerated below, in the District of Nevada, defendant,  
16 **KUANG WAN FANG**, together with other individuals, known and unknown, aiding and abetting  
17 one another, did willfully and knowingly use and attempt to use a passport the issue of which was  
18 secured in any way by reason of any false statement; that is, on or about the dates enumerated  
19 below, defendant **KUANG WAN FANG** willfully and knowingly used and attempted to use  
20 United States Passport No. 112355996, issued on or about June 23, 2000, in the name of **KUANG**  
21 **WAN FANG**, the issue of which was secured by reason of a false statement made in **KUANG**  
22 **WAN FANG**'s passport application concerning the identity of her spouse in violation of Title 18,  
23 United States Code, Sections 1542 and 2.

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COUNT	DATE
10	October 4, 2000
11	October 10, 2000
12	October 2, 2001

**COUNTS THIRTEEN TO FIFTEEN**  
(Use of a Fraudulently Obtained Passport)

24. On or about the dates enumerated below, in the District of Nevada, defendant, **YU YING YI**, together with other individuals, known and unknown, aiding and abetting one another, did willfully and knowingly use and attempt to use a passport the issue of which was secured in any way by reason of any false statement; that is, on or about the dates enumerated below, defendant YU YING YI willfully and knowingly used and attempted to use United States Passport No. 055922471, issued on or about November 29, 1999, in the name of YU YING YI, the issue of which was secured by reason of a false statement made in YU YING YI's passport application concerning the identity of her spouse, in violation of Title 18, United States Code, Sections 1542 and 2.

COUNT	DATE
13	October 4, 2000
14	October 7, 2000
15	October 10, 2000

1 **FORFEITURE ALLEGATION ONE**

2 1. The allegations of Count One of this Indictment are realleged and  
3 incorporated by reference as if fully restated herein for the purpose of alleging that certain  
4 property is subject to forfeiture to the United States, pursuant to Title 18, United States  
5 Code, Section 1963.

6 2. As a result of their violations of Title 18, United States Code, Section 1962(d), as  
7 alleged in the foregoing Indictment,

8 **XU CHAOFAN,**  
9 **XU GUOJUN,**  
10 **KUANG WAN FANG,**  
11 **YU YING YI, and**  
12 **KWONG WA PO,**

13 defendants herein:

- 14 a. have acquired and maintained interests in violation of Title 18, United States Code,  
15 Section 1962, which interests are subject to forfeiture to the United States, pursuant  
16 to Title 18, United States Code, Section 1963(a)(1);
- 17 b. have interests in, securities of, claims against, and property and contractual rights  
18 affording sources of influence over, the Enterprise described in Count One which  
19 defendants established, operated, controlled, conducted, and participated in the  
20 conduct of, and conspired to do so, in violation of Title 18, United States Code,  
21 Section 1962, thereby making all such interests, securities, claims, and property  
22 and contractual rights subject to forfeiture to the United States of America pursuant  
23 to Title 18, United States Code, Section 1963(a)(2);
- 24 c. have property constituting and derived from proceeds obtained, directly and  
25 indirectly, from racketeering activity in violation of Title 18, United States Code,  
26 Section 1963(a)(3).

27 3. The interests of defendants subject to forfeiture to the United States, pursuant to  
28 Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3) include approximately \$485  
million United States dollars, including but are not limited to:

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a. Seized United States and foreign currency:

- US\$162,033
- Can\$5,305
- HK\$4,570
- Aus\$1,785
- NZ\$220
- Singapore\$169
- 7,202 Yuan
- 40 Macau Pataca
- 32,000 Vietnamese Dongs
- 1,706 Malaysian Ringgits
- 20 South African Rands
- 84,000 Japanese Yen
- 154,100 Indonesian Rupiahs
- 26,725 Philippine Pesos

b. Seized Jewelry:

(I) Watches:

- Men's gold and silver colored watch, "Rolex" on face
- Women's watch with a clear stone, "Audemars Piguet" on back
- Women's silver colored watch with clear stones, "Piaget" on face
- Silver colored men's watch with "Audemars Piguet" on the back
- Silver colored watch with clear stones, "Audemars Piguet"
- Silver colored women's watch, "Concord" on face
- Silver and gold colored watch, "Rolex" on face
- Gold colored watch, "Piaget" on face
- Silver colored watch with clear stones
- Gold colored watch with clear stones, "Rolex" on face
- Black watchband
- Silver colored "Bvlgari " watch
- Gold colored "Gucci " watch
- Silver colored "Cartier " watch with blue band
- Gold colored "Rolex " watch

(ii) Rings:

- Silver colored ring with clear and yellow stones
- Silver colored ring with large clear stone in the center plus small stones
- Silver colored ring with clear stone
- Silver colored ring with clear stone and off-clear stones
- Silver colored ring with clear stones
- Silver colored ring with clear stones
- Silver colored ring with blue and clear stones
- Silver colored ring with clear stones
- Twenty gold colored rings
- Four silver colored rings with clear stones

(iii) Bracelets:

- Green colored bracelet

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Silver colored bracelet with star  
Eleven gold colored bracelets

(iv) Necklaces:

Two Gold colored necklaces with cat pendants  
Gold colored necklace with a gold colored pendant with a square hole  
Gold colored necklace  
Silver colored necklace with heart shaped pendant with clear stones  
Gold colored necklace with flower shaped pendant  
Gold colored necklace with tear drop shaped pendant  
Two gold colored necklaces  
Gold colored necklace with heart shaped pendant  
Gold colored necklace with square pendant  
Gold colored necklace with green pendant  
Gold colored necklace with a flower shaped pendant  
Silver colored necklace with cross shaped pendant with clear stones  
Silver colored necklace with clear stones  
Gold colored locket with a green bead  
Four box chain necklaces with various charms

(v) Pendants, earrings, charms, and jewelry boxes:

Gold colored pendant with a rabbit on the front  
White and green colored circle  
Two green and silver colored pendants  
Gold colored pendant labeled fine gold 1 oz.  
Square gold colored pendant with a water buffalo  
Two pair of gold colored post earrings  
Gold colored figurines: three mice, two tigers, a bowl  
Gold peanut charm  
Heart shaped charm with diamonds  
Wave charm with a diamond  
Silver colored jewelry box

c. Seized Computers and Computer Equipment:

Tiger tower computer  
Sony tower computer  
Dell Dimension tower computer  
Hewlett Packard tower computer  
Four IBM laptops

d. Seized Real Property:

6171 Udy Road, Richmond, British Columbia, Canada  
6160 Udy Road, Richmond, British Columbia, Canada  
6620 Mang Road, Richmond, British Columbia, Canada

e. Seized Vehicle

2002 LEXUS SUV,  
VIN: JTJGF10U120124865



1 personal, involved in the money laundering offense and traceable to the property involved in the  
2 offense, which property is subject to forfeiture pursuant to Title 18, United States Code, Section  
3 982.

4 3. The interests of the defendants, subject to forfeiture pursuant to Title 18, United  
5 States Code, Section 982, include: all money and other property that was the subject of each  
6 transaction; all commissions, fees and other property constituting proceeds obtained as a result of  
7 those violations; and all property of the defendant used in any manner or part to commit or to  
8 facilitate the commission of those violations in the amount of approximately \$485 million in  
9 United States dollars, including, but not limited to:

10 a. Seized United States and foreign currency:

11 US\$162,033  
12 Can\$5,305  
13 HK\$4,570  
14 Aus\$1,785  
15 NZ\$220  
16 Singapore\$169  
17 7,202 Yuan  
18 40 Macau Pataca  
19 32,000 Vietnamese Dongs  
20 1,706 Malaysian Ringgits  
21 20 South African Rands  
22 84,000 Japanese Yen  
23 154,100 Indonesian Rupiahs  
24 26,725 Philippine Pesos

25 b. Seized Jewelry:

26 (I) Watches:

27 Men's gold and silver colored watch, "Rolex" on face  
28 Women's watch with a clear stone, "Audemars Piguet" on back  
Women's silver colored watch with clear stones, "Piaget" on face  
Silver colored men's watch with "Audemars Piguet" on the back  
Silver colored watch with clear stones, "Audemars Piguet"  
Silver colored women's watch, "Concord" on face  
Silver and gold colored watch, "Rolex" on face  
Gold colored watch, "Piaget" on face  
Silver colored watch with clear stones  
Gold colored watch with clear stones, "Rolex" on face  
Black watchband  
Silver colored "Bvlgari " watch  
Gold colored "Gucci " watch

- 1 Silver colored "Cartier " watch with blue band  
Gold colored "Rolex " watch
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- 3 (ii) Rings:
- 4 Silver colored ring with clear and yellow stones  
Silver colored ring with large clear stone in the center plus small stones  
Silver colored ring with clear stone  
Silver colored ring with clear stone and off-clear stones  
Silver colored ring with clear stones  
Silver colored ring with clear stones  
Silver colored ring with blue and clear stones  
Silver colored ring with clear stones  
Twenty gold colored rings  
Four silver colored rings with clear stones
- 9 (iii) Bracelets:
- 10 Green colored bracelet  
Silver colored bracelet with star  
Eleven gold colored bracelets
- 12 (iv) Necklaces:
- 13 Two Gold colored necklaces with cat pendants  
Gold colored necklace with a gold colored pendant with a square hole  
Gold colored necklace  
Silver colored necklace with heart shaped pendant with clear stones  
Gold colored necklace with flower shaped pendant  
Gold colored necklace with tear drop shaped pendant  
Two gold colored necklaces  
Gold colored necklace with heart shaped pendant  
Gold colored necklace with square pendant  
Gold colored necklace with green pendant  
Gold colored necklace with a flower shaped pendant  
Silver colored necklace with cross shaped pendant with clear stones  
Silver colored necklace with clear stones  
Gold colored locket with a green bead  
Four box chain necklaces with various charms
- 21 (v) Pendants, earrings, charms, and jewelry boxes:
- 22 Gold colored pendant with a rabbit on the front  
White and green colored circle
- 23 Two green and silver colored pendants  
Gold colored pendant labeled fine gold 1 oz.
- 24 Square gold colored pendant with a water buffalo  
Two pair of gold colored post earrings
- 25 Gold colored figurines: three mice, two tigers, a bowl  
Gold peanut charm
- 26 Heart shaped charm with diamonds
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Wave charm with a diamond  
Silver colored jewelry box

c. Seized Computers and Computer Equipment:

Tiger tower computer  
Sony tower computer  
Dell Dimension tower computer  
Hewlett Packard tower computer  
Four IBM laptops

d. Seized Real Property:

6171 Udy Road, Richmond, British Columbia, Canada  
6160 Udy Road, Richmond, British Columbia, Canada  
6620 Mang Road, Richmond, British Columbia, Canada

e. Seized Vehicle

2002 LEXUS SUV,  
VIN: JTJGF10U120124865

4. By virtue of the commission of the offense charged in Count Two of this Indictment by the defendants, all right, title or interest that defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to Title 18, United States Code, Section 982.

5. If any of the forfeitable property described above, as a result of any act or omission by 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,

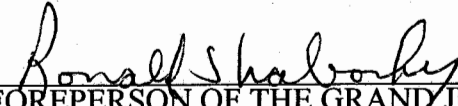
the United States of America shall be entitled to forfeiture of substitute property under the

1 provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United  
2 States Code, Section 982(b)(1).

3 All pursuant to Title 21, United States Code, Section 853.

4 **DATED:** this 31 day of January 2006.

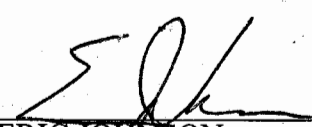
5 **A TRUE BILL:**

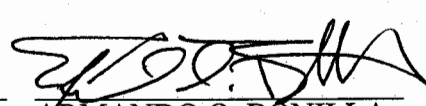
6   
FOREPERSON OF THE GRAND JURY.

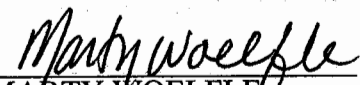
7  
8 DANIEL G. BOGDEN  
United States Attorney

ANDREW LOURIE  
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