

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Criminal Case No. 09-cr-00269-WYD

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DAN KHAU TANG,

Defendant

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INFORMATION

CHARGING STATUTES

18 U.S.C. §982(a)(1)  
18 U.S.C. §1956(a)(1)(B)(i)  
18 U.S.C. §1956(h)

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THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**

On or about and between January 1, 2007, and February 16, 2008, within the State and District of Colorado, the defendant DAN KHUA TANG, and others, did knowingly and intentionally conspire to conduct and attempt to conduct a series of financial transactions affecting interstate commerce, which financial transactions involved the proceeds from a specified unlawful activity, to wit, the cultivation and distribution of marijuana, knowing that the series of financial transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds from the specified unlawful activity and knowing that property

involved in the financial transactions represented the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h).

**COUNT TWO**

**FORFEITURE ALLEGATION**

The allegations contained in Count One of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

Upon conviction of the violations alleged in Count One of this Information involving violations of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h), the defendant

DAN TANG

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1) any and all of the defendant's right, title and interest in the following below specified property which is traceable to or involved in the offense:

- a. \$17,797.00 in United States currency;
- b. \$529,550.00 in United States currency;
- c. \$320,120.00 in United States currency;
- d. \$170,000.00 in United States currency;
- e. \$2,000.00 in United States currency;
- f. \$400,100.00 in United States currency;
- g. \$44,583.75 check converted to cash:

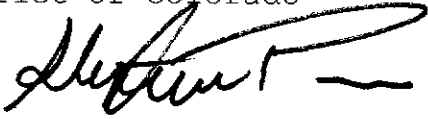
- h. \$1,151.26 seized from Bank of the West  
Account # 915072557;
- i. \$49,671.01 seized from Bank of the West  
Account # 915001374;
- j. \$17,356.51 seized from Bank of the West  
Account # 915059729;
- k. \$40,000.00 seized from Wells Fargo  
Account # 3393125673;
- l. \$47,534.00 seized from Wells Fargo  
Account # 5737570217;
- m. \$59,526.66 seized from Wells Fargo  
Account # 5737570688;
- n. \$1,472.26 seized from Wells Fargo  
Account # 6299055696; and
- o. \$160,162.85 seized from Wells Fargo  
Account # 1342733224.

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

- a) cannot be located upon the exercise of due  
diligence;
- b) has been transferred or sold to, or deposited  
with, a third party;
- c) has been placed beyond the jurisdiction of the  
Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which  
cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18,  
United States Code, Section 982(b) to seek forfeiture of any  
other property of said defendants up to the value of the  
forfeitable property.

DAVID M. GAQUETTE  
Acting United States Attorney  
District of Colorado



By: STEPHANIE PODOLAK

s/STEPHANIE PODOLAK  
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Attorney for the Government

(Rev. 04/07)

DATE: June 17, 2009

DEFENDANT: DAN KHAU TANG

YOB: 1962

ADDRESS (CITY/STATE): Thornton, CO

COMPLAINT FILED?  YES  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?  YES  NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: Count 1: Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h) - Conspire to conduct and attempt to conduct a series of financial transactions affecting interstate commerce, which financial transactions involved the proceeds from a specified unlawful activity

Count 2: Title 18, United States Code, Section 982(a)(1) - Forfeiture allegation

LOCATION OF OFFENSE (COUNTY/STATE): Adams County, CO

PENALTY: Count 1: NMT 20 years imprisonment, \$500,000.00 fine, or twice the value of the property involved in the money laundering transactions which were the overt acts in the conspiracy, 3 years supervised release, and \$100.00 special assessment fee

AGENT: Special Agent Mike Marshall  
Drug Enforcement Administration

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less  over five days  other

THE GOVERNMENT

will seek detention in this case  will not seek detention in this case

The statutory presumption of detention is applicable to this defendant.

OCDETF CASE:  Yes  No