

Introduction

At all times material to this indictment:

1. Allen A. Rad & Associates, P.C., was a law firm licensed to practice in the State of Texas and maintained offices at 12900 Preston Road, Suite 900, Dallas, TX 75230; 1600 East Pioneer Parkway, Suite 335, Arlington, TX 76010; and 2001 Beach Street, Suite 600, Fort Worth, TX 76103. Allen A. Rad & Associates, P.C., formerly known as Rad & Associates, P.C., was established to offer legal services to the general public and including the representation of clients claiming to have suffered personal injuries resulting from motor vehicle accidents. Allen A. Rad & Associates, P.C. (hereinafter referred to as the Rad Law Firm), litigated the personal injury cases by filing claims against insurance companies for physical injuries, medical expenses, loss of wages, and motor vehicle property damages allegedly suffered by their clients.
2. Trey Allen, P.C. was a law firm licensed to practice in the State of Texas and maintained an office at 4514 Cole Avenue, Suite 705, Dallas, TX 75204. Trey Allen, P.C., formerly known as the Law Office of John H. Allen III, PC, was established to offer legal services to the general public and included the representation of clients claiming to have suffered personal injuries resulting from motor vehicle accidents. Trey Allen, P.C. (hereinafter referred to as the Trey Allen Law Firm), litigated the personal injury cases by filing claims against insurance companies for physical injuries, medical expenses, loss of wages, and property damages allegedly suffered by their clients.
3. Law Offices of de Kirby & Associates, P.C., was a law firm licensed to practice in the State of Texas and maintained offices at 2150 E. Pioneer Parkway, Suite 110, Arlington, TX 76010 and 165 N. Plano Road, Richardson, TX 75081. Law Offices of de Kirby and Associates, P.C., was established to offer legal services to the general public and included the representation of clients claiming to have suffered personal injuries resulting from motor vehicle accidents. Law Offices of de Kirby and Associates, P.C. (hereinafter referred to as the de Kirby Law Firm), litigated the personal injury cases by filing claims against insurance companies for physical injuries, medical expenses, loss of wages, and property damages allegedly suffered by their clients.
4. Brandt & Brandt, P.C., was a law firm licensed to practice in the State of Texas and maintained offices at 2150 E. Pioneer Parkway, Suite 108, Arlington, TX 76010 and 10560 Walnut Street, Suite 550, Dallas, TX 75243. Brandt & Brandt, P.C., was established to offer legal services to the general public and

included the representation of clients claiming to have suffered personal injuries resulting from motor vehicle accidents. Brandt & Brandt, P.C. (hereinafter referred to as the Brandt Law Firm), litigated the personal injury cases by filing claims against insurance companies for physical injuries, medical expenses, loss of wages, and property damages allegedly suffered by their clients.

5. Pham & Associates was a law firm licensed to practice in the State of Texas and maintained offices at 8350 North Central Expressway, Suite 789, Dallas, TX 75206. Pham & Associates, P.C. was established to offer legal services to the general public and included the representation of clients claiming to have suffered personal injuries resulting from motor vehicle accidents. Pham & Associates, P.C. (hereinafter referred to as the Pham Law Firm), litigated the personal injury cases by filing claims against insurance companies for physical injuries, medical expenses, loss of wages, and property damages allegedly suffered by their clients.
6. Law Offices of T. Rick Frazier was a law firm licensed to practice law in the State of Texas and maintained offices at 5495 Beltline, Suite 100, Dallas, TX 75254. Law Offices of T. Rick Frazier was established to offer legal services to the general public and included the representation of clients claiming to have suffered personal injuries resulting from motor vehicle accidents. Rick Frazier and defendant Law Offices of T. Rick Frazier (hereinafter referred to as the Frazier Law Firm), litigated the personal jury cases by filing claims against insurance companies for physical injuries, medical expenses, loss of wages, and motor vehicle property damages allegedly suffered by their clients.
7. Accident Injury Care Center & Associates, Inc., (also known as Injury Care Center) a chiropractic facility licensed to practice in the State of Texas, maintained offices at 1334 East Pioneer Parkway, Suite A, Arlington, TX. Accident Injury Care Center was primarily operated to provide treatment to patients reporting they suffered personal injuries, and to generate medical billing records for defendants to submit with insurance claims.
8. **Tinh Tim Ngo (Tim Ngo)** was a Doctor of Chiropractic medicine licensed to practice in the State of Texas and maintained offices under the following names and addresses:
 - a. Pain & Injury/Rehab P.C.
2525 E. Arkansas, Suite 201
Arlington, TX
 - b. Chirocare Pain Injury Clinic

2540 E. Arkansas
Arlington, TX

Tim Ngo's chiropractic clinics were primarily operated by **Tim Ngo** to provide treatment to patients reporting they suffered personal injuries, and to generate medical billing records for defendants to submit with insurance claims.

9. Injury Plus Pain Clinic, a chiropractic facility licensed to practice in the State of Texas, maintained offices under the following name and addresses:

a. Injury Plus Pain Clinic
787 E. Park Row
Arlington, TX

b. Injury Plus Pain Clinic
AKA First Injury Clinic
3159 Denton Highway
Haltom City, TX

These chiropractic clinics were primarily operated to provide treatment to patients reporting they suffered personal injuries, and to generate medical billing records for defendants to submit with insurance claims.

10. Gentle Care Chiropractic, a Chiropractic medicine facility licensed to practice in the State of Texas, maintained offices at 10544 West Walnut Street, Suite 101, Dallas, TX. Gentle Care Chiropractic was primarily operated to provide treatment to patients reporting they suffered personal injuries, and to generate medical billing records for defendants to submit with insurance claims.

11. M & D Chiropractic, a Chiropractic medicine facility licensed to practice in the State of Texas, maintained offices at 100 W. Pioneer Parkway, Suite 108, Arlington, Texas. M & D Chiropractic was primarily operated to provide treatment to patients reporting they suffered personal injuries, and to generate medical billing records for defendants to submit with insurance claims.

12. Defendants **Tuan (Andy) Nguyen (Andy Nguyen), Dorina Buriman, Gabriel Buriman, Benjamin Covaci, Daniel Covaci, Jose Manuel Herrera (Manuel Herrera), Jesus Huerta, Tinh Tim Ngo (Tim Ngo), To Xuan Ngo (To Ngo), Anh Linh Nguyen (Anh Nguyen), Cindy Tu Nguyen (Cindy Nguyen), Joe Ngoc Nguyen (Joe Nguyen), Lanh Jackson Nguyen (Jackson Nguyen), Toan Ngoc Nguyen (Toan Nguyen), Clement Oancea, Tereza Oancea, Daniel Pascu, Nona Magdalena Taut (Nona Taut), Ovidiu Taut, Nhat Huy Tran (Huy Tran), Tay Ngoc Tran (Tay Tran), and Phuong Thi**

Truong (Phuong Truong) resided in the Dallas/Fort Worth Metroplex Area and participated in the staging of automobile accidents, recruitment of other individuals to participate in staged accidents, and the submissions of false and fraudulent insurance claims for injuries and damages allegedly caused by the accidents. Further, the defendants directed other participants to certain medical clinics for treatment and to certain law firms to file fraudulent insurance claims.

13. The insurance companies specified herein were in the business of issuing insurance policies and providing payment of claims to and on behalf of insured individuals in settlement of injuries and damages allegedly sustained in a motor vehicle collision. The insurance companies, [Health Care Benefit Companies per 18 U.S.C. § 24(b)] are in the business of making payments in connection with the delivery of health care benefits, items and services. The insurance companies included the following entities:

- a. A-Affordable Insurance Company (Old American)
- b. Allstate Insurance Co.
- c. American Century Casualty Co.
- d. Amica Mutual Insurance Co.
- e. Coast National Insurance Company (Bristol West)/Home State Mutual Insurance Co.
- f. Farmers Insurance Group of Companies
- g. Geico Direct / Colonial County Mutual Insurance Co.
- h. Liberty Mutual Group
- i. Nationwide Insurance Co.
- j. Old American County Mutual Fire Insurance Co.
- k. Progressive County Mutual Insurance Co.
- l. The Republic Group/Southern County Mutual Insurance Co.
- m. Safeco Property & Casualty Mutual Insurance Co.
- n. State Farm Insurance Companies
- o. Texas Farm Bureau Insurance Companies
- p. Unitrin County Mutual Insurance Co.
- q. Young American Insurance Co.

Count One
Conspiracy to Commit Mail Fraud and Health Care Fraud
(Violation of 18 U.S.C. § 1349 [18 U.S.C. § 1341; 1347])

The Grand Jury re-alleges and incorporates the Introduction of this Indictment as fully set forth herein.

Beginning on a date unknown to the grand jury but continuing from on or about January 2000, to the present, within the Dallas Division of the Northern District of Texas and elsewhere, **Andy Nguyen, Dorina Buriman, Gabriel Buriman, Benjamin Covaci, Daniel Covaci, Manuel Herrera, Jesus Huerta, Tim Ngo, To Ngo, Anh Nguyen, Cindy Nguyen, Joe Nguyen, Jackson Nguyen, Toan Nguyen, Clement Oancea, Tereza Oancea, Daniel Pascu, Nona Taut, Ovidiu Taut, Huy Tran, Tay Tran, and Phuong Truong**, aided and abetted by others named and not named herein, knowingly, willfully and unlawfully combined, conspired, confederated and agreed with each other to commit certain offenses against the United States, to wit:

- (a) mail fraud, that is, to devise a scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing such scheme or artifice or attempting to do so, knowingly caused mail matter to be sent and delivered by the United States Postal Service according to the directions thereon, in violation of 18 U.S.C. § 1341; and

(b) healthcare fraud, that is, to knowingly and willfully execute, and attempt to execute a scheme and artifice to defraud and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the control of Medicare, a healthcare benefit program, as defined in 18 U.S.C. § 24(b), in connection with the delivery of and payment for health care benefits, items, and services, in violation of 18 U.S.C. § 1347.

Staged Accident Scheme and Artifice to Defraud

On or about January 2000 to the present, defendants **Andy Nguyen, Dorina Buriman, Gabriel Buriman, Benjamin Covaci, Daniel Covaci, Manuel Herrera, Jesus Huerta, Tim Ngo, To Ngo, Anh Nguyen, Cindy Nguyen, Joe Nguyen, Jackson Nguyen, Toan Nguyen, Clement Oancea, Tereza Oancea, Daniel Pascu, Nona Taut, Ovidiu Taut, Huy Tran, Tay Tran, and Phuong Truong** entered into a scheme and artifice to defraud numerous insurance companies. The scheme and artifice to defraud involved the staging of multiple motor vehicle accident scenes to fraudulently depict either the collision of two previously damaged vehicles, or to intentionally cause the planned collision of two vehicles. Fraudulent claims were filed with the insurance companies by the insured or by a law firm retained to represent the insured. These claims included fraudulent bills for the damage incurred by the vehicles in the staged accidents and claims for injuries that never occurred or were negligible but medical bills had been created by willing chiropractors for the specific purpose of inflating the

number of treatments and the severity of the injuries. As a result of the scheme and artifice to defraud, numerous insurance companies paid the perpetrators of the scheme and artifice to defraud hundreds of thousands of dollars based on fraudulent claims.

Manner and Means of the Conspiracy

It was part of the conspiracy and the scheme and artifice to defraud that one or more of the defendants and others would and did the following:

1. Organizers of the staged accidents would and did recruit individuals to participate in the reported accidents;
2. Organizers of the staged accidents would and did obtain salvaged vehicles to be used in the reported accidents;
3. Organizers of the staged accidents re-titled vehicles in the state of Arkansas as a way of removing the "salvaged vehicle" designation and for the specific purpose of fraudulently increasing the vehicle's book value;
4. Organizers of the staged accidents would and did obtain insurance on vehicles used in the reported accidents and on the individuals allegedly driving or owning the vehicles;
5. Organizers of the staged accidents would and did create accident scenes to fraudulently depict the collision of two previously damaged vehicles and to feign personal injuries by individuals participating in the scheme;
6. Organizers of the staged accidents would and did create intentional and controlled collisions of two vehicles to cause actual property damages and to feign personal injuries by individuals participating in the scheme;
7. Organizers of the staged accidents would and did obtain medical treatment, and referred other coconspirators to obtain treatment, at clinics owned and operated by willing chiropractors, for the specific purpose of obtaining medical bills that inflated the number of treatments and the severity of the injuries;

8. Some of the Chiropractors and their employees would and did generate false medical and billing records for submission to the victim insurance companies when no treatments were provided or required;
9. Organizers of the staged accidents would and did obtain the services of specific law firms to aid in the submission and settlement of their fraudulent claims against victim insurance companies;
10. The law firms and their employees would and did cause insurance companies to settle the defendants' accident claims based on the false and fraudulent medical and property damage information submitted;
11. The law firms and their employees would and did cause insurance companies to deposit settlement checks into the mail stream to be delivered by the U.S. Postal Service in payment of the false claims;
12. The law firms and their employees would and did distribute the insurance settlement checks to the defendants and thereby allowed the defendants to unlawfully profit from the fraudulent scheme; and
13. As a result of the conspiracy and scheme to defraud, the coconspirators would and did defraud victim insurance companies of in excess of one million dollars (\$1,000,000).

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy and scheme and artifice to defraud, and in order to affect its objects, the defendants and their coconspirators committed and caused to be committed the following overt acts, among others, in the Dallas Division of the Northern District of Texas and elsewhere:

Staged Accident A (June 22, 2002)

1. Sometime prior to the alleged accident, defendant **Andy Nguyen** recruited defendant **Gabriel Buriman** to participate in the staged accident scheme.
2. On or about March 5, 2002, defendant **Gabriel Buriman** purchased a 1998 Ford Escort.

3. On or about March 11, 2002, defendant **Gabriel Buriman** titled the 1998 Ford Escort in Arkansas.
4. On or about April 9, 2002, defendant **Toan Nguyen** obtained State Farm Insurance policy #421560-D09-43, to insure a 2000 Jaguar.
5. On or about April 29, 2002, defendant **Andy Nguyen** gave a 2000 Jaguar to defendant **Toan Nguyen**, and titled the vehicle in Texas.
6. On or about June 15, 2002, defendant **Gabriel Buriman** obtained Nationwide Insurance policy, #63C567388, to insure the 1998 Ford Escort.
7. On or about June 22, 2002, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1998 Ford Escort and the 2000 Jaguar and five (5) participants, including himself and defendants **Phuong Truong, Jackson Nguyen, Toan Nguyen, and Gabriel Buriman**.
8. During the period of on or about June 25, 2002 through August 26, 2002, employee's of Injury Plus Pain Clinic, caused medical and billing records to be prepared on defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, and Toan Nguyen** and submitted the records to the Brandt Law Firm and/or the de Kirby Law Firm.
9. On or about June 26, 2002, the Brandt Law Firm caused a representation letter to be sent to the State Farm Insurance Company advising them of the representation of defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen and Toan Nguyen**.
10. During the period of on or about July 3, 2002 through October 2, 2002, **Tim Ngo**, and other persons associated with Chirocare Pain & Injury, caused medical and billing records to be prepared on defendant **Gabriel Buriman** and submitted the records to the Nationwide Insurance Company.
11. On or about July 11, 2002, **Gabriel Buriman** caused the Nationwide Insurance Company to mail a settlement check in the amount of \$5,500 in settlement of medical claims.
12. On or about August 23, 2002, the de Kirby Law Firm caused a representation letter to be sent to the Nationwide Insurance Company advising them of the representation of defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen and Toan Nguyen**.

13. On or about September 5, 2002, the de Kirby Law Firm caused a representation letter to be sent to the State Farm Insurance Company advising them of the representation of defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, and Toan Nguyen.**
14. On or about September 30, 2002, the de Kirby Law Firm caused an insurance claim, #43-R965-537, and demand letters to be sent the State Farm Insurance Company on behalf of defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, and Toan Nguyen.**
15. On or about October 7, 2002, the de Kirby Law Firm caused an insurance claim, #6303C567388, to be sent to Nationwide Insurance Company.
16. On or about October 21, 2002, the de Kirby Law Firm caused an insurance claim, #6303C567388, and demand letters to be sent to the Nationwide Insurance Company on behalf of defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, and Toan Nguyen.**
17. During the period of on or about July 11, 2002 through December 20, 2002, the de Kirby Law Firm caused the Nationwide Insurance Company to mail settlement checks to the de Kirby law firm in settlement of the fraudulent claims filed by defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, Toan Nguyen,** and others.
18. On or about October 10, 2002, the de Kirby Law Firm caused the State Farm Insurance Company to mail settlement checks for defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, and Toan Nguyen** to the de Kirby Law Firm.
19. On or about October 21, 2002, the de Kirby Law Firm caused the Nationwide Insurance Company to mail settlement checks to the de Kirby law firm in settlement of the fraudulent claims filed by defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, and Toan Nguyen.**
20. On or about October 24, 2002, the State Farm and Nationwide Insurance Company settlement checks were deposited into the de Kirby Law Firm Interest on Lawyer Trust Account (IOLTA) maintained at Bank of America.
21. During the period of on or about October 31, 2002 through November 1, 2002, the de Kirby Law Firm distributed payments to defendants **Andy Nguyen, Phuong Truong, Jackson Nguyen, and Toan Nguyen** in

settlement of their fraudulent claims, by issuing checks drawn on the de Kirby Law Firm IOLTA account.

22. On or about October 31, 2002, the de Kirby Law Firm prepared and gave checks payable to Injury Plus Pain Clinic, in payment of the fraudulent medical bills, by issuing the checks out of their de Kirby Law Firm IOLTA account.
23. On or about October 31, 2002, the de Kirby Law Firm issued four checks out of the de Kirby IOLTA account, payable to Injury Pain Clinic or Injury + Pain Clinic, totaling \$8,400.00, as settlement of the medical expense allegedly incurred by defendants **Andy Nguyen, Jackson Nguyen, Phuong Truong,** and **Toan Nguyen.**

Staged Accident B (October 8, 2002)

1. Sometime prior to the alleged accident, defendant **Andy Nguyen** recruited coconspirator **Tay Tran** to participant in the staged accident scheme.
2. On or about February 27, 2002, defendant **Andy Nguyen** purchased a 1999 Dodge Caravan Van for \$300 and titled the vehicle in Texas.
3. On or about July 15, 2002, defendant **Andy Nguyen** gave a 1999 Dodge Caravan Van to an unindicted coconspirator known to the Grand Jury who titled the vehicle in Texas.
4. On or about July 24, 2002, defendant **Ovidiu Taut**, under Mihai Taut's Buyer's License, purchased from CoPart a salvaged 1999 Dodge Dakota Pickup, the previous owner of which was Progressive County Mutual Insurance.
5. On or about July 24, 2002, defendant **Ovidiu Taut** sold the 1999 Dodge Dakota Pickup to Fly N Buy, in Hot Springs, Arkansas.
6. On or about August 28, 2002, defendant **Daniel Pascu** purchased the 1999 Dodge Dakota Pickup from Fly N Buy, in Hot Springs, Arkansas.
7. On or about August 30, 2002, the 1999 Dodge Dakota Pickup was titled in the state of Arkansas, in the name of defendant **Daniel Pascu**, 505 Richard Street, Hot Springs, Arkansas.
8. On or about September 30, 2002, defendant **Daniel Pascu** obtained a Farmers Insurance policy, #68447464, for the 1999 Dodge Dakota Pickup.

9. On or about October 8, 2002, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1999 Dodge Caravan and the 1999 Dodge Dakota and seven (7) participants, including himself and defendants **Phuong Truong, Tay Tran, Daniel Pascu, Ovidiu Taut**, and two unindicted coconspirators known to the Grand Jury.
10. On or about October 10, 2002, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the Farmers Insurance Company, advising them of the representation of two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran**.
11. On or about October 16, 2002, the Trey Allen Law Firm caused a representation letter to be sent to the State Farm Insurance Company advising them of the representation of two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran**.
12. During the period of on or about October 9, 2002 through December 30, 2002, Injury Plus Pain Clinic, and other persons associated with the clinic, caused medical and billing records to be prepared on two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran** and submitted the records to the Trey Allen Law Firm.
13. On or about March 4, 2003, an employee of the Trey Allen Law Firm caused an insurance claim, #43-S034-559, and demand letters to be sent to the State Farm Insurance Company on behalf of two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran**.
14. On or about March 4, 2003, the Trey Allen Law Firm caused an insurance claim, #H1256313, and demand letters, to be sent to the Farmers Insurance Company on behalf of two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran**.
15. On or about March 12, 2003, the Trey Allen Law Firm caused the State Farm Insurance Company to mail checks to the Allen law firm in settlement of the fraudulent claims filed by two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran**.

16. On or about March 19, 2003, the Trey Allen Law Firm endorsed and caused the distribution of the State Farm Insurance Company settlement checks to the two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran**.
17. During the period of on or about October 15, 2002 through June 4, 2003, the Trey Allen Law Firm caused the Farmers Insurance Company to mail settlement checks to the Allen law firm and other locations in settlement of the fraudulent claims filed by two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, Tay Tran, Daniel Pascu and Ovidiu Taut**.
18. On or about June 17, 2003, the Trey Allen Law Firm deposited the Farmers Insurance settlement checks, into the Trey Allen Law Firm Compass Bank, IOLTA.
19. On or about June 17, 2003, the Trey Allen Law Firm caused the distribution of settlement checks, drawn on the Trey Allen Law Firm IOLTA account, to two unindicted coconspirators known to the Grand Jury and defendants **Andy Nguyen, Phuong Truong, and Tay Tran**, as settlement of their fraudulent claims.

Accident C (November 17, 2002)

1. Sometime prior to the alleged accident, defendant **Andy Nguyen** recruited defendants **Nona Taut and Clement Oancea** to participant in the staged accident scheme.
2. On or about May 24, 2002, defendants **Ovidiu Taut and Nona Taut** purchased a 1998 Nissan Pathfinder and titled the vehicle in Texas.
3. On or about August 22, 2002, a 1994 Mercedes 320E was obtained and titled in Texas, in the name of defendant **Toan Nguyen**.
4. On or about October 28, 2002, defendant **Toan Nguyen** obtained Farmers Insurance policy, #H1-260460 to insure the 1994 Mercedes.
5. On or about November 17, 2002, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1998 Nissan Pathfinder and the 1994 Mercedes and four participants, including defendants **Nona Taut, Clement Oancea, Toan Nguyen, and To Ngo**.

6. During the period of on or about November 18, 2002 through January 18, 2003, employee's of Injury Plus Pain Clinic caused medical and billing records to be prepared on defendants **Toan Nguyen** and **To Ngo**, and submitted the records to the Trey Allen Law Firm.
7. During the period of on or about November 18, 2002 through February 12, 2003, **Tim Ngo**, and other persons associated with Chirocare Pain & Injury, caused medical and billing records to be prepared on defendants **Nona Taut** and **Clement Oancea**, and submitted the records to the State Farm Insurance Company.
8. On or about November 20, 2002, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the State Farm Insurance Company advising them of the representation of defendants **Toan Nguyen** and **To Ngo**.
9. On or about November 22, 2002 through April 25, 2003, the Trey Allen Law Firm caused the State Farm Insurance Company to mail checks to them and other locations in settlement of the fraudulent claims filed by defendants **Toan Nguyen** and **To Ngo**.
10. On or about March 13, 2003, **Nona Taut** caused the State Farm Insurance Company to mail a settlement check in the amount of \$7,343 in settlement of her accident claim.
11. On or about March 31, 2003, an employee of the Trey Allen Law Firm caused an insurance claim #1002323555, to be sent to Farmers Insurance Company on behalf of **Toan Nguyen** and **To Ngo**.
12. On or about April 1, 2003, an employee of the Trey Allen Law Firm caused a representation letter to be sent to Farmers Insurance Company advising them of the representation of defendants **Toan Nguyen** and **To Ngo**.
13. On or about April 1, 2003, the Trey Allen Law Firm caused an insurance claim #43-S054-949 and demand letters to be sent to the State Farm Insurance Company on behalf of **Toan Nguyen** and **To Ngo**.
14. On or about April 25, 2003, the Trey Allen Law Firm caused the State Farm Insurance Company to mail settlement checks, each in the amount of \$7,000, in settlement of **Toan Nguyen's** and **To Ngo's** medical claims.

15. On or about April 30, 2003, the State Farm Insurance settlement checks were deposited into the Trey Allen Law Firm IOLTA account maintained at Compass Bank.
16. On or about May 2, 2003, the Trey Allen Law Firm distributed payments from their IOLTA account to defendant **Toan Nguyen**, in the amount of \$4,668 in settlement of his fraudulent claims.
17. On or about June 19, 2003, the Trey Allen Law Firm caused Farmers Insurance Company to mail settlement checks to defendant **Toan Nguyen** in the amount of \$3,072, and to defendant **To Ngo** in the amount of \$3,366, in settlement of their fraudulent claims.

Staged Accident D (May 18, 2003)

1. On or about November 1, 2000, defendant **Clement Oancea** purchased a 1995 Pontiac Grand AM, a flood damaged salvaged vehicle, and insured the vehicle with the State Farm Insurance Company, policy #202353-E17-43I, falsely asserting that the vehicle did not have prior damage.
2. On or about January 4, 2003, a 2000 Honda Passport was purchased from AAMO Auto Sales and titled in the name of defendant **Cindy Nguyen**.
3. On or about January 13, 2003, defendant **Cindy Nguyen** added the 2000 Honda Passport to her Farmers insurance policy, #68358310.
4. On or about May 18, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1995 Pontiac Grand AM and the 2000 Honda Passport and six participants, including defendants **Cindy Nguyen**, **Anh Nguyen**, **Tereza Oancea**, **Clement Oancea**, and two persons known to the Grand jury.
5. During the period of on or about May 19, 2003 through July 23, 2003, Injury Plus Pain Clinic and other persons associated with the clinic, caused medical and billing records to be prepared on an unindicted coconspirator known to the Grand Jury, **Cindy Nguyen**, and **Anh Nguyen** and submitted the records to Trey Allen, P.C to be forwarded to State Farm and Farmers insurance companies.
6. During the period of on or about May 21, 2003 through August 26, 2003, Pain & Injury Rehab and others associated with the clinic, caused medical and billing records to be prepared on defendants **Tereza Oancea**, **Clement**

Oancea, and a person known to the Grand Jury, and submitted the records to the State Farm Insurance Company.

7. On or about May 22, 2003, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the State Farm Insurance Company advising them of the representation of an unindicted coconspirator known to the Grand Jury and defendants **Cindy Nguyen** and **Anh Nguyen**.
8. On or about June 9, 2003, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the Farmers Insurance Company advising them of the representation of an unindicted coconspirator known to the Grand Jury and defendants **Cindy Nguyen** and **Anh Nguyen**.
9. On or about August 26, 2003, defendant **Clement Oancea** signed a State Farm Insurance Company "Application for Benefits" form fraudulently claiming expenses resulting from the May 18, 2003, accident.
10. On or about September 4, 2003, Pain & Injury Rehab, and others associated with the clinic, submitted the medical treatment and billing records to the State Farm Insurance Company for defendants **Tereza Oancea**, **Clement Oancea**, and a person known to the Grand Jury.
11. During the period of on or about September 10, 2003 through September 15, 2003, defendants **Tereza Oancea**, **Clement Oancea** and a person known to the Grand Jury caused the State Farm Insurance Company to mail them checks in settlement of the fraudulent claims filed for the May 18, 2003 staged accident.
12. On or about September 19, 2003, an employee of the Trey Allen Law Firm caused an insurance claim, #1003257320, and demand letters to be sent to the Farmers Insurance Company on behalf of an unindicted coconspirator known to the Grand Jury and defendants **Cindy Nguyen** and **Anh Nguyen**.
13. On or about September 19, 2003, the Trey Allen Law Firm caused an insurance claim, #43-S162-355, and demand letters to be sent to the State Farm Insurance Company on behalf of an infant, and defendants **Cindy Nguyen** and **Anh Nguyen**.
14. On or about June 2, 2003 through November 14, 2003, the Trey Allen Law Firm caused the State Farm Insurance Company to mail checks to them and other locations in settlement of the fraudulent claims file by defendants **Cindy Nguyen** and **Anh Nguyen**.

15. During the period of on or about October 21, 2003 through December 8, 2003, the Trey Allen Law Firm caused the Farmers Insurance Company to mail checks to them in settlement of the fraudulent claims filed by an unindicted coconspirator known to the Grand Jury and defendants **Cindy Nguyen** and **Anh Nguyen**.
16. During the period of on or about November 19, 2003 through December 15, 2003, the Trey Allen Law Firm deposited the Farmers Insurance checks into the Trey Allen Law Firm Compass Bank IOLTA account.
17. During the period of on or about November 19, 2003 through December 15, 2003, the Trey Allen Law Firm caused the distribution of checks, drawn on the Trey Allen Law Firm IOLTA account to defendants **Cindy Nguyen** and **Anh Nguyen**.

Staged Accident E (May 21, 2003)

1. Sometime prior to the alleged accident, defendant **Andy Nguyen** recruited an unindicted coconspirator known to the Grand Jury to participate in the staged accident scheme.
2. On or about January 8, 2003, AAMO obtained a 2001 Mazda MPV that had been salvaged in Nebraska.
3. On or about March 11, 2003, defendant **Andy Nguyen** purchased the 2001 Mazda MPV from AAMO Auto Sales for \$2,150.
4. On or about March 24, 2003, defendant **Andy Nguyen** titled the 2001 Mazda MPV in Arkansas.
5. On or about April 14, 2003, Mihai Taut allegedly transferred the title of a 2000 Ford Crown Victoria to an unindicted coconspirator known to the Grand Jury.
6. On or about May 5, 2003, an unindicted coconspirator known to the Grand Jury obtained Safeco Insurance policy #Y6905617, for the 2000 Ford Crown Victoria.
7. On or about May 19, 2003, (2 days prior to accident), defendant **Andy Nguyen** obtained Republic Group/Southern County Mutual Insurance policy #RNA1025569, for the 2001 Mazda MPV.

8. On or about May 21, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2001 Mazda MPV and the 2000 Ford Crown Victoria and three participants including himself, defendant **Jackson Nguyen**, and an unindicted coconspirator known to the Grand Jury.
9. On or about May 23, 2003, the Rad Law Firm caused a representation letter to be sent to the Safeco Insurance Company advising them of the representation of defendants **Andy Nguyen** and **Jackson Nguyen**.
10. During the period of on or about May 22, 2003 through August 5, 2003, Injury Plus Pain Clinic and others associated with the clinic caused medical and billing records to be prepared on defendants **Andy Nguyen** and **Jackson Nguyen**.
11. On or about June 5, 2003, the Rad Law Firm caused a representation letter to be sent to the Republic Group/Southern County Mutual Insurance advising them of the representation of defendants **Andy Nguyen** and **Jackson Nguyen**.
12. On or about August 5, 2003, an employee of the Rad Law Firm caused a claim to be sent to the Safeco Insurance Company on behalf of defendant **Andy Nguyen's** car rental expenses.
13. On or about August 12, 2003, the Rad Law Firm caused insurance claim #99214548 and demand letters to be sent to the Republic Group/Southern County Mutual Insurance on behalf of defendants **Andy Nguyen** and **Jackson Nguyen**.
14. On or about August 13, 2003, the Rad Law Firm caused insurance claim #761690802020, and demand letters to be sent to the Safeco Insurance Company on behalf of defendants **Andy Nguyen** and **Jackson Nguyen**.
15. On or about August 19, 2003, the Rad Law Firm caused Republic Group/Southern County Mutual Insurance to mail checks to them in settlement of the fraudulent claims filed by defendants **Andy Nguyen** and **Jackson Nguyen**.
16. On or about September 5, 2003, an employee of the Rad Law Firm caused medical records to be sent to the Safeco Insurance Company on behalf of defendant **Jackson Nguyen**.

17. On or about November 3, 2003, an employee of the Rad Law Firm caused claim release forms, signed by defendants **Andy Nguyen** and **Jackson Nguyen**, to be sent to the Safeco Insurance Company.
18. During the period of on or about July 2, 2003 through October 28, 2003, the Rad Law Firm caused the Safeco Insurance Company to mail checks to them and other locations in settlement of the fraudulent claims filed by defendants **Andy Nguyen** and **Jackson Nguyen**.
19. On or about October 27, 2003, the Rad Law Firm caused the distribution of checks, drawn on the Rad Law Firm Bank of America IOLTA account to defendants **Andy Nguyen** and **Jackson Nguyen** as settlement of their fraudulent insurance claims.

Staged Accident F (September 13, 2003)

1. Sometime prior to the alleged accident, defendant **Andy Nguyen** recruited a person known to the Grand Jury to participate in the staged accident scheme.
2. On or about July 9, 2002, a 2000 Mazda Protégé was purchased from CoPart Auto Auction under Mihai Taut's Buyer's License.
3. Sometime prior to the accident, defendant **Andy Nguyen** provided a salvaged vehicle, the 2000 Mazda Protégé, to a person known to the Grand Jury to be used in the planned accident scheme.
4. On or about August 21, 2003, the 2000 Mazda Protégé, was titled in Arkansas in the name of a second person known to the Grand Jury.
5. On or about September 3, 2003, a 2000 Mitsubishi Galant was titled in Texas in the name of defendant **Joe Nguyen**.
6. On or about September 9, 2003, an unindicted coconspirator known to the Grand Jury obtained Progressive Insurance policy, #41783655-0, for the 2000 Mazda Protégé.
7. On or about September 11, 2003, defendant **Joe Nguyen** obtained Safeco Insurance policy, #Y6967228, for the 2000 Mitsubishi Galant.
8. On or about September 13, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2000 Mitsubishi Galant and the 2000 Mazda Protégé and eight participants including defendants **Joe**

Nguyen, Ovidiu Taut, Nona Taut, Daniel Pascu, and four persons known to the Grand Jury.

9. During the period of on or about September 15, 2003 through November 25, 2003, Injury Plus Pain Clinic, and others associated with the clinic caused medical and billing records to be prepared on defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu**, and sent the records to Trey Allen, P.C.
10. During the period of on or about September 16, 2003 through November 26, 2003, Chirocare Pain & Injury, and others associated with the clinic caused fraudulent medical and billing records to be prepared on four persons known to the Grand Jury, and then sent the records to the Progressive Insurance Company.
11. On or about September 19, 2003, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the Progressive Insurance Company advising them of the representation of defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu**.
12. During the period of on or about September 30, 2003 through January 28, 2004, the Trey Allen Law Firm caused the Progressive Insurance Company to mail checks to defendant **Joe Nguyen** and others in settlement of their fraudulent claims.
13. On or about November 12, 2003, a letter purportedly signed by an unindicted coconspirator known to the Grand Jury was sent to the Progressive Insurance Company falsely representing the title history of the 2000 Mazda Protégé.
14. On or about November 24, 2003, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the Safeco Insurance Company advising them of the representation of defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu**.
15. On or about January 7, 2004, an employee of the Trey Allen Law Firm caused a representation, an insurance claim, #Y6967228, and demand letter for benefits, to be sent to the Safeco Insurance Company on behalf of defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu**.
16. On or about January 7, 2004, the Trey Allen Law Firm caused an insurance claim, #031464870, and demand letters to be sent to the Progressive

Insurance Company on behalf of defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu.**

17. On or about February 4, 2004, the Trey Allen Law Firm withdrew from representing defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu.**
18. On or about February 6, 2004, an employee of the Pham Law Firm caused representation letters to be sent to the Progressive Insurance Company and the Safeco Insurance Company, advising them of the representation of defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu.**
19. On or about February 10, 2005, the Pham Law Firm caused the Safeco Insurance Company to mail checks to them as settlement of the fraudulent claims filed by defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu.**
20. During the period of on or about February 16, 2005 through March 14, 2005, the Pham Law Firm deposited the Safeco Insurance checks into the Pham Law Firm Comerica Bank IOLTA account.
21. On or about February 16, 2004, defendant **Tim Ngo**, owner/operator of Chirocare Pain & Injury caused a letter to be sent to the Progressive Insurance Company demanding the payment of medical treatment allegedly rendered to four persons known to the Grand Jury.
22. On or about February 23, 2004, defendant **Tim Ngo** caused Progressive Insurance Company to mail a check to Chirocare Pain & Injury, in the amount of \$5,018, as settlement of the fraudulent medical expenses of a person known to the Grand Jury.
23. On or about March 23, 2004, the Pham Law Firm caused Progressive Insurance Company to mail checks to them as settlement of the fraudulent claims filed by defendants **Joe Nguyen, Ovidiu Taut, Nona Taut, and Daniel Pascu.**
24. On or about April 1, 2004, the Pham Law Firm deposited Progressive Insurance checks into the Pham Law Firm IOLTA account at the Comerica Bank.

Staged Accident G (October 19, 2003)

1. Sometime prior to the accident, defendant **Andy Nguyen** recruited a person known to the Grand Jury who then recruited a second person known to the Grand Jury to participate in the staged accident.
2. On or about July 11, 2002, a person known to the Grand Jury purchased a 1999 Mitsubishi Galant, allegedly from an unindicted coconspirator known to the Grand Jury, for \$200 and titled the vehicle in Texas.
3. On or about August 25, 2003, defendant **Jackson Nguyen** allegedly purchased a 2003 Chevy Cavalier from AAMO for approximately \$500 and titled the vehicle in Texas.
4. On or about October 19, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1999 Mitsubishi Galant and the 2003 Chevy Cavalier and three participants, including defendant **Jackson Nguyen** and two persons known to the Grand Jury.
5. During the period of on or about October 20, 2003 through January 12, 2004, employee's of Injury Plus Pain Clinic caused medical and billing records to be prepared on defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury, and submitted the records to the Trey Allen Law Firm.
6. On or about October 21 2003, the Trey Allen Law Firm caused a representation letter to be sent to the State Farm Insurance Company advising them of the representation of defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury.
7. On or about November 5, 2003, the Trey Allen Law Firm caused a representation letter to be sent to the Farmers Insurance Company advising them of the representation of defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury.
8. On or about March 9, 2004, the Trey Allen Law Firm caused an insurance claim, #1004004499, and demand letters to be sent to the Farmers Insurance Company on behalf of defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury.
9. On or about March 9, 2004, the Trey Allen Law Firm caused an insurance claim, #43-S255-175, and demand letters to be sent to the State Farm

Insurance Company on behalf of defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury.

10. During the period of on or about October 24, 2003 through April 23, 2004, the Trey Allen law Firm caused the State Farm Insurance Company to mail settlement checks to them and others in settlement of the fraudulent claims filed by defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury.
11. During the period of on or about April 12, 2004, the Trey Allen Law Firm caused the Farmers Insurance Company to mail settlement checks to them and others in settlement of the fraudulent claims filed by defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury.
12. On or about April 28, 2004, the State Farm Insurance Company settlement checks were deposited into the Trey Allen Law Firm Compass Bank IOLTA account.
13. During the period of on or about April 28, 2004 through June 24, 2004, the Trey Allen law Firm distributed payments to defendant **Jackson Nguyen** and an unindicted coconspirator known to the Grand Jury, in settlement of their fraudulent claims, by issuing checks drawn on the Trey Allen Law Firm IOLTA account.

Staged Accident H (November 1, 2003)

1. Sometime prior to the accident defendant **Andy Nguyen** recruited an unindicted coconspirator known to the Grand Jury.
2. On or about May 14, 2003, a 2002 BMW 745L was purchased from CoPart Auto Auction, under the Mihai Taut Buyer's License.
3. On or about July 16, 2003, the 2002 BMW 745L was titled in Arkansas.
4. On or about September 15, 2003, Mihai Taut sold the vehicle to AAMO.
5. On or about September 30, 2003, defendant **Toan Nguyen** purchased the BMW from AAMO, allegedly for \$40,000, and titled the 2002 BMW 745L in Texas.
6. On or about October 9, 2003, a Ford F150 Pickup was purchased from CoPart Auto Auction, under the Mihai Taut Buyer's License.

7. On or about October 22, 2003, an unindicted coconspirator known to the Grand Jury obtained insurance for his Ford F150 with the Progressive Insurance Company.
8. On or about November 1, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2002 BMW 745L and the Ford F150 allegedly driven by an unindicted coconspirator known to the Grand Jury. Five participants were involved in the staged accident including defendants **Toan Nguyen**, **Huy Tran**, along with two unindicted coconspirators known to the Grand Jury, and a person known to the Grand Jury.
9. During the period of on or about November 3, 2004 through January 17, 2005, Injury Plus Pain and others associated with the clinic, caused medical and billing records to be prepared on two unindicted coconspirators known to the Grand Jury and defendants **Toan Nguyen** and **Huy Tran**, and submitted the records to the Trey Allen Law firm.
10. On or about February 12, 2004, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the Progressive Insurance Company advising them of the representation of defendants **Toan Nguyen** and **Huy Tran**.
11. During the period of on or about February 23, 2004 through March 30, 2004, the Trey Allen Law Firm caused the Progressive Insurance Company to mail settlement checks to them in settlement of the fraudulent claims filed by defendants **Toan Nguyen** and **Huy Tran**.
12. On or about April 8, 2004, the Trey Allen Law Firm deposited the Progressive Insurance settlement checks, payable to defendants **Toan Nguyen** and **Huy Tran**, into the Trey Allen Law Firm Compass Bank IOLTA account.
13. During the period of on or about March 7, 2004 through April 7, 2004, the Trey Allen Law Firm caused the distribution of settlement checks, drawn on the Trey Allen Law Firm IOLTA account, to defendants **Toan Nguyen** and **Huy Tran** as settlement of their fraudulent claims.

Staged Accident I (November 5, 2003)

1. On or about June 27, 2003, defendant **Phuong Truong**, on behalf of defendant **Andy Nguyen**, using proceeds from Accident C, purchased a

2003 Nissan Xterra from CoPart Auto Auction, under the Mihai Taut Buyer's License.

2. On or about July of 2003, Mihai Taut allegedly sold the 2003 Nissan to AAMO, and AAMO allegedly sold the 2003 Nissan Xterra to defendant **Phuong Truong**.
3. On or about July 25, 2003, defendant **Phuong Truong** titled the vehicle in Arkansas without the salvage designation.
4. On or before September 16, 2003, an unindicted coconspirator known to the Grand Jury included the 2003 Nissan Xterra on her State Farm Insurance policy.
5. On or about October 8, 2003, a person known to the Grand Jury allegedly purchased a salvaged 1993 Isuzu Rodeo from AAMO.
6. On or about October 13, 2003, a person known to the Grand Jury obtained a Texas driver license.
7. On or about October 20, 2003, a person known to the Grand Jury, with the assistance of defendant **Andy Nguyen**, obtained insurance coverage on the 1993 Isuzu with the Coast National Insurance Company (Bristol West).
8. On or about November 5, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2003 Nissan Xterra and the 1993 Isuzu Rodeo and three participants including defendants **Tay Tran**, **To Ngo**, and a person known to the Grand Jury.
9. On or about November 10, 2003, the Trey Allen law Firm caused a representation letter to be sent to Coast National Insurance Company (Bristol West) advising them of the representation of defendants **Tay Tran** and **To Ngo**.
10. During the period of on or about November 11, 2003 through January 13, 2004, Injury Plus Pain Clinic, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Tay Tran** and **To Ngo** and submitted the records to the Trey Allen law Firm.
11. On or about February 12, 2004, the Trey Allen Law Firm caused a representation letter, insurance claim, #43-S273-047, and demand letters to be sent to the State Farm Insurance Company on behalf of defendants **Tay Tran** and **To Ngo**.

12. On or about February 12, 2004, the Trey Allen Law Firm caused an insurance claim, #2003-111997, and demand letters to be sent to Coast National Insurance Company (Bristol West) on behalf of defendants **Tay Tran** and **To Ngo**.
13. On or about February 22, 2004, the Trey Allen Law Firm caused State Farm Insurance to mail them checks in settlement of the fraudulent claims filed by defendants **Tay Tran** and **To Ngo**.

Staged Accident J (November 14, 2003)

1. On or about April 24, 2003, an Infiniti QX4 was purchased from CoPart Auto Auction, under the Mihai Taut Buyer's License.
2. On or about May 28, 2003, the 2000 Infinity QX4 was titled in Arkansas.
3. On or about November 5, 2003, Mihai Taut transferred title of the 2000 Infinity QX4 to defendant **Daniel Pascu** and titled the vehicle in Texas.
4. On or about November 5, 2003, defendant **Daniel Pascu** obtained Progressive Insurance policy #41928781-0, for the 2000 Infinity QX4.
5. On or about November 5, 2003, an unindicted coconspirator known to the Grand Jury allegedly purchased a 2000 Chrysler Cirrus.
6. On or November 14, 2003, (1:00 pm, 6 hours before the accident) an unindicted coconspirator known to the Grand Jury obtained Coast National Insurance Company (Bristol West) policy #A06376711000, for the Chrysler Cirrus.
7. On or about November 14, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2000 Infinity QX4 and the 2000 Chrysler Cirrus and five (5) participants, including defendants **Daniel Pascu**, **Nona Taut**, **Ovidiu Taut**, and two unindicted coconspirators known to the Grand Jury.
8. During the period of on or about November 17, 2003 through February 24, 2004, Chirocare Pain & Injury, and others associated with the clinic, caused medical and billing records to be prepared on two unindicted coconspirators known to the Grand Jury, and then sent the records to Coast National Insurance Company (Bristol West) for payment.

9. On or about November 21, 2003, defendant **Daniel Pascu** rented a replacement vehicle and charged the cost of the rental to a Rad Law Firm American Express account.
10. On or about November 24, 2003, the Rad Law Firm caused a representation letter to be sent to Home State & County Mutual, an insurance company administrated by the Coast National Insurance Company (Bristol West), advising them of the representation of defendants **Daniel Pascu**, **Nona Taut**, and **Ovidiu Taut**.
11. During the period of on or about November 24, 2003 through December 3, 2003, Injury Care Center, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Daniel Pascu**, **Nona Taut**, and **Ovidiu Taut** and sent the records to the Rad Law Firm.
12. On or about April 1, 2004, the Rad Law Firm caused an insurance claim, #2003-114166, and demand letters to be sent to Coast National Insurance Company (Bristol West), a company administrated by Coast National Insurance Company (Bristol West), on behalf of defendants **Daniel Pascu**, **Nona Taut**, and **Ovidiu Taut**.
13. During the period of on or about April 23, 2004 through September 7, 2004, the Rad Law Firm caused Coast National Insurance Company (Bristol West) to mail checks to them and to other locations, in settlement of the fraudulent claims filed by defendants **Daniel Pascu**, **Nona Taut**, and **Ovidiu Taut**.
14. On or about April 1, 2004, the Rad Law Firm caused an insurance claim, #042-342-724, and demand letters to be sent to the Progressive Insurance Company on behalf of defendants **Daniel Pascu**, **Nona Taut**, and **Ovidiu Taut**.
15. During the period of on or about April 27, 2004 through June 25, 2004, Chirocare Pain & Injury, and others associated with the clinic, caused medical and billing records to be prepared on an unindicted coconspirator known to the Grand Jury, and the records, along with a demand letter for reimbursement of the medical treatment cost, to be sent to Coast National Insurance Company (Bristol West).
16. During the period of on or about May 4, 2004 through October 8, 2004, the Rad Law Firm caused the distribution of settlement checks, drawn on the Rad Law Firm North Dallas Bank IOLTA account, to defendants **Daniel**

Pascu, Nona Taut, and Ovidiu Taut as settlement of their fraudulent claims.

17. During the period of on or about May 10, 2004 through October 7, 2004, the Rad Law Firm deposited the Coast National Insurance Company (Bristol West) settlement checks into the Rad Law Firm North Dallas Bank IOLTA account.
18. On or about June 28, 2004, Chirocare Pain & Injury caused the Coast National Insurance Company (Bristol West) to mail a settlement check to them as settlement of the medical treatment allegedly provided to an unindicted coconspirator known to the Grand Jury.
19. On or about September 7, 2004, the Rad Law Firm caused the distribution of settlement checks, drawn on the Rad Law Firm IOLTA account, to Injury Care Center, as payment of the fraudulent medical bills for defendants **Daniel Pascu, Nona Taut, and Ovidiu Taut**.

Staged Accident K (November 21, 2003)

1. On or about November 19, 2003, defendant **Gabriel Buriman** allegedly purchased a 2001 Dodge Caravan from defendant **Phuong Truong** and titled the vehicle in Arkansas using P.O. Box 34416, Little Rock, AR 72203.
2. On or about November 21, 2003, at approximately 6:21 pm, defendant **Gabriel Buriman** obtained Progressive insurance policy #41968380-0, to insure the 2001 Dodge Caravan.
3. On or about November 21, 2003, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2001 Dodge Caravan and a U-Haul truck. The U-Haul truck was rented by an unindicted coconspirator and the Caravan was allegedly occupied by two defendants, **Gabriel Buriman** and **Dorina Buriman**.
4. During the period of November 24, 2003 through December 9, 2003, Chirocare Pain & Injury Clinic and others associated with the clinic caused medical and billing records to be prepared on an unindicted coconspirator.
5. During the period of on or about December 1, 2003 through March 9, 2004, Injury Care Center and others associated with the clinic caused medical and billing records to be prepared on defendants **Gabriel Buriman** and **Dorina Buriman**.

6. On or about June 4, 2004, defendants **Gabriel Buriman** and **Dorina Buriman** submitted insurance claim, #042731626, to the Progressive Insurance Company fraudulently claiming medical injuries resulting from the staged accident.
7. On or about June 4, 2004, defendants **Gabriel Buriman** and **Dorina Buriman** caused the Progressive Insurance Company to mail checks to them totaling approximately \$10,036, in settlement of their fraudulent medical expenses.

Staged Accident L (June 29, 2004)

1. Sometime prior to the alleged accident, defendant **Andy Nguyen**, through defendant Manuel Herrera, recruited a person known to the Grand Jury to participate in the staged accident scheme.
2. At the time of the staged accident, the vehicle driven by the person known to the Grand Jury, a 1987 Cadillac Seville, was not titled in his name.
3. On or about May 19, 2004, a 2001 Isuzu Trooper was purchased from CoPart Auto Auction, under the Mihai Taut Buyer's License.
4. On or about June 11, 2004, an unindicted coconspirator known to the Grand Jury allegedly purchased a 2001 Isuzu Trooper from Mihai Taut.
5. On or about June 21, 2004, an unindicted coconspirator known to the Grand Jury added the 2001 Isuzu Trooper to his Farmers Insurance policy.
6. On or about June 28, 2004, (the day before the accident) defendants **Manuel Herrera** and **Andy Nguyen**, paid for an A-Affordable Insurance Company (Old American) insurance policy, #TXB-12872490, for the 1987 Cadillac driven by a person known to the Grand Jury.
7. On or about June 29, 2004, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1987 Cadillac Seville and the 2001 Isuzu Trooper and five participants, including defendants **Phuong Truong**, **Huy Tran**, and three unindicted coconspirators known to the Grand Jury.
8. During the period of on or about June 30, 2004 through September 30, 2004, M & D Chiropractic, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Phuong Truong** and **Huy Tran** and sent the records to the Trey Allen Law Firm.

9. On or about July 1, 2004, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the A-Affordable Insurance Company (Old American) Claims Department, advising them of the representation of defendants **Phuong Truong, Huy Tran**, along with two unindicted coconspirators known to the Grand Jury.
10. On or about July 19, 2004, the Trey Allen Law Firm caused a representation letter to be sent to the Farmers Insurance Company, advising them of the representation of defendants **Huy Tran, Phuong Truong**, and two unindicted coconspirators known to the Grand Jury.
11. On or about October 22, 2004, the Trey Allen Law Firm caused an insurance claim, #1005197992, and demand letter to be sent to the Farmers Insurance Company on behalf of defendants **Phuong Truong and Huy Tran**.
12. On or about November 23, 2004, the Trey Allen Law Firm caused the Farmers Insurance Company to mail checks to them as settlement of the fraudulent claims filed by defendants **Phuong Truong, Huy Tran**, and two unindicted coconspirators known to the Grand Jury.
13. During the period of on or about January 5, 2005 through January 13, 2005, the Trey Allen Law Firm caused the Old American Insurance Company to mail checks to them as settlement of the fraudulent claims filed by defendants **Phuong Truong, Huy Tran** and two unindicted coconspirators known to the Grand Jury.
14. On or about January 21, 2005, the Trey Allen Law Firm deposited the Old American settlement checks into the Trey Allen Law Firm Compass Bank IOLTA account.
15. During the period of on or about January 20, 2005 through January 27, 2005, the Trey Allen Law Firm distributed checks drawn on the Trey Allen Law Firm IOLTA account to defendants **Phuong Truong, Huy Tran** and two unindicted coconspirators known to the Grand Jury, as settlement of their fraudulent claims.

Staged Accident M (August 16, 2004)

1. Sometime prior to the alleged accident defendant **Andy Nguyen**, through the assistance of a person known to the Grand Jury, recruited another person known to the Grand Jury to participate in the staged accident.

2. On or about June 1, 2004, defendant **Andy Nguyen** purchased a 2004 Infinity G35 from Nationwide Salvage.
3. On or about June 29, 2004, defendant **Andy Nguyen** sold the 2004 Infinity to defendant **Toan Nguyen** and the vehicle was titled in Texas.
4. On or about August 9, 2004, defendant **Toan Nguyen** added the 2004 Infinity to his Farmers Insurance policy.
5. On or about August 10, 2004, a person known to the Grand Jury obtained Old American insurance policy #TXB12918980, to insure his 1995 GMC Jimmy.
6. On or about August 16, 2004, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1995 GMC and the 2004 Infinity and three participants, including himself and defendant **Toan Nguyen** and a person known to the Grand Jury.
7. During the period of on or about August 17, 2004 through November 5, 2004, M&D Chiropractic, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Andy Nguyen**, and **Toan Nguyen** and submitted the records to the Trey Allen Law Firm
8. On or about August 20, 2004, the Trey Allen Law Firm caused representation letters to be sent to A-Affordable Insurance Company (Old American) advising them of the representation of defendants **Andy Nguyen** and **Toan Nguyen**.
9. On or about August 30, 2004, the Trey Allen Law Firm caused a representation letter to be sent to the Farmers Insurance Company advising them of the representation of defendants **Andy Nguyen** and **Toan Nguyen**.
10. On or about November 30, 2004, the Trey Allen Law firm caused an insurance claim, #1005401184, to be sent to the Farmers Insurance Company on behalf of defendants **Andy Nguyen** and **Toan Nguyen**.
11. During this same time frame the Trey Allen Law firm caused an insurance claim, #TXB12918980401, to be sent to A-Affordable Insurance Company (Old American) on behalf of defendants **Andy Nguyen** and **Toan Nguyen**.
12. During the period of on or about October 5, 2004 through February 18, 2005, the Trey Allen Law Firm caused the Farmers Insurance Company to

mail settlement checks to defendants **Andy Nguyen** and **Toan Nguyen** in settlement of their fraudulent claims.

13. On or October 5, 2004, the Farmers Insurance Company mailed a settlement check, in the amount of \$9,791.56, payable to defendant **Toan Nguyen** c/o the Trey Allen Law Firm, as settlement of **Toan Nguyen's** fraudulent claim.
14. On or about November 22, 2004, a person known to the Grand Jury cashed a \$2,671.41 Farmers Insurance Company check at Dallas Check Cashers.
15. On or about January 21, 2005, the Farmers Insurance Company mailed a settlement check, in the amount of \$3,949, payable to defendant **Andy Nguyen** c/o the Trey Allen Law Firm, as settlement of **Andy Nguyen's** fraudulent claim.
16. On or about February 10, 2005, defendant **Andy Nguyen** cashed the \$3,949 Farmers Insurance check at Dallas Check Cashers.

Staged Accident N (September 8, 2004)

1. On or about July 6, 2004, a 2000 Ford Focus was purchased from CoPart Auto Auction, under the Mihai Taut Buyer's License.
2. On or about August 25, 2004, Mihai Taut sold the 2000 Ford Focus to defendant **Jackson Nguyen**.
3. On or about September 5, 2004, defendant **Jackson Nguyen** sold the 2000 Ford Focus to defendant **Andy Nguyen** and titled the vehicle in Texas.
4. On or about September 6, 2004, defendant **Andy Nguyen** obtained a Coast National Insurance Company (Bristol West) insurance policy on the 2000 Ford Focus.
5. On or about September 8, 2004, defendant **Andy Nguyen** staged an automobile accident allegedly involving a 1989 Dodge Shadow and the 2000 Ford Focus and four participants including himself, defendants **Daniel Pascu**, **Daniel Covaci**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury.
6. During the period of on or about September 9, 2004 through December 10, 2004, Chirocare Pain & Injury Clinic, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Andy**

Nguyen, Daniel Pascu, Daniel Covaci and a person known to the Grand Jury, and sent the records to a Law Office representing them in that matter.

7. On or about November 10, 2004, State Farm Insurance Company mailed a settlement check to defendant **Jackson Nguyen**, (last registered owner of the Ford Focus) in the amount of \$7,233.78, in settlement of the vehicle property damage.
8. On or about November 17, 2004, the State Farm check was cashed at Dallas Check Cashing by defendant **Jackson Nguyen**.
9. On or about November 2, 2005, Coast National Insurance Company (Bristol West) mailed settlement checks, to defendants **Andy Nguyen, Daniel Pascu, Daniel Covaci** and a person known to the Grand Jury, each in the amount of \$5,011.00 in settlement of their fraudulent claims.

Staged Accident O (December 18, 2004)

1. Sometime prior to the alleged accident, defendants **Manuel Herrera** and **Andy Nguyen** recruited a person known to the Grand Jury to participate in the staged accident scheme.
2. On or about November 15, 2003, a person known to the Grand Jury purchased a 2004 Dodge Ram Pickup, and titled the vehicle in Texas.
3. On or about November 24, 2004, unindicted coconspirator known to the Grand Jury gave a 2001 Isuzu Trooper (the same vehicle used in accident N) to defendant **Toan Nguyen**.
4. On or about December 3, 2004, defendant **Toan Nguyen** obtained State Farm Insurance policy, #072723943, for the 2001 Isuzu Trooper.
5. On or about December 18, 2004, defendant **Andy Nguyen**, staged an automobile accident allegedly involving the 2001 Isuzu Trooper and the 2004 Dodge Ram Pickup and five participants, including defendants **Phuong Truong, Toan Nguyen**, an unindicted coconspirator known to the Grand Jury, and two persons known to the Grand Jury.
6. On or about December 30, 2004, the De Kirby Law Firm caused a representation letter to be sent to the Allstate Insurance Company advising them of the representation of defendants **Phuong Truong** and **Toan Nguyen**

7. On or about January 20, 2005, a paralegal for the de Kirby Law Firm caused a representation letter to be sent to the State Farm Insurance Company advising them of the representation of defendants **Phuong Truong** and **Toan Nguyen**.
8. During the period of on or about December 23, 2004 through March 7, 2005, Gentle Care Chiropractic, and others associated with the clinic, caused medical and billing records to be prepared on a person known to the Grand Jury, and sent the records to the de Kirby Law Firm.
9. During the period of on or about December 20, 2004 through March 15, 2005, Injury Plus Pain Clinic, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Phuong Truong** and **Toan Nguyen** and then they sent the records to the de Kirby Law Firm.
10. On or about April 19, 2005, the de Kirby Law Firm caused an insurance claim, #4530607524, and demand letter for defendant **Phuong Truong** to be mailed to the Allstate Insurance Company.
11. On or about April 27, 2005, the de Kirby Law Firm caused an insurance claim, #4530607524, and demand letter for defendant **Toan Nguyen**, to be sent to the Allstate Insurance Company.
12. During the period of on or about January 21, 2005 through July 14, 2005, the de Kirby Law Firm caused the Allstate Insurance Company to send checks to them and other locations, in settlement of the fraudulent claims filed by defendants **Phuong Truong** and **Toan Nguyen**.
13. During the period of on or about May 17, 2005 through July 25, 2005, the de Kirby Law Firm deposited the Allstate Insurance Company settlement checks into the de Kirby Law Firm Bank of America IOLTA account.
14. During the period of on or about May 10, 2005 through July 29, 2005, the de Kirby Law Firm distributed checks drawn on the de Kirby Law Firm IOLTA account to the defendants **Phuong Truong** and **Toan Nguyen** as settlement of their fraudulent claims.

Staged Accident P (January 22, 2005)

1. Sometime prior to the accident, defendant **Andy Nguyen** recruited a person known to the Grand Jury to participate in the accident scheme.

2. Sometime prior to the accident, defendant **Andy Nguyen** recruited a second person known to the Grand Jury to participate in the accident scheme.
3. On or about January 5, 2005, defendant **Andy Nguyen** sold a 1998 BMW 4-door sedan, Model 740, to defendant **Ovidiu Taut** for \$800.
4. On or about January 12, 2005, defendant **Ovidiu Taut** obtained a Republic Group/Southern County Mutual Insurance policy, #1044037-99, for the 1998 BMW.
5. On or about January 21, 2005, one of the persons known to the Grand Jury obtained an insurance policy, #782060911, for his four-door Saturn with the Nationwide Insurance Company.
6. On or about January 22, 2005, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1998 BMW and the Saturn and five participants, including defendants **Ovidiu Taut**, **Daniel Covaci**, an unindicted coconspirator known to the Grand Jury, and two persons known to the Grand Jury.
7. On or about January 26, 2005, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the Nationwide Insurance Company, advising them of the representation of defendants **Ovidiu Taut** and **Daniel Covaci**.
8. On or about January 26, 2005, an employee of the Trey Allen Law Firm caused an additional representation letter to be sent to the Nationwide Insurance Company concerning the other accident participants and the subject 1998 BMW.
9. During the period of on or about January 24, 2005 through April 29, 2005, Chirocare Pain & Injury Clinic, and others associated with the clinic, caused medical and billing records to be prepared on a person known to the Grand Jury, an unindicted coconspirator known to the Grand Jury, and defendants **Ovidiu Taut** and **Daniel Covaci**, and sent the records to the Trey Allen Law Firm.
10. On or about June 13, 2005, the Trey Allen Law Firm caused an insurance claim, #99222868, and demand letters to be sent to Republic Group/Southern County Mutual Insurance, on behalf of a person known to the Grand Jury, and unindicted coconspirator known to the Grand Jury, and defendants **Ovidiu Taut** and **Daniel Covaci**.

11. On or about June 14, 2005, the Trey Allen Law Firm caused an insurance claim, #060911, and demand letters to be sent to the Nationwide Insurance Company, on behalf of a person known to the Grand Jury, an unindicted coconspirator known to the Grand Jury, and defendants **Ovidiu Taut** and **Daniel Covaci**.
12. During the period of on or about January 31, 2005, through January 11, 2006, the Trey Allen Law Firm caused the Nationwide Insurance Company to mail checks to them as settlement of the fraudulent claims filed by defendants **Ovidiu Taut** and **Daniel Covaci**.
13. On or about July 12, 2005, the Trey Allen Law Firm caused the Republic Group/Southern County Mutual Insurance to mail checks to them in settlement of the fraudulent claims filed by defendants **Ovidiu Taut**, **Daniel Covaci**, and a person known to the Grand Jury.
14. On or about August 4, 2005, the Trey Allen Law Firm deposited Republic Group/Southern County Mutual Insurance checks into the Trey Allen Law Firm Compass Bank IOLTA account.
15. On or about August 2, 2005, an employee of the Trey Allen Law Firm distributed checks drawn on the Trey Allen Law Firm IOLTA account, to defendant **Tim Ngo**, owner of Chirocare Pain & Injury Clinic, in payment of fraudulent medical bills prepared for defendants **Ovidiu Taut**, **Daniel Covaci**, and a person known to the Grand Jury.

Staged Accident Q (March 12, 2005)

1. On or about August 30, 2004, a 2002 Pontiac Grand Prix was purchased from CoPart Auto Auction, under the Mihai Taut Buyer's License.
2. On or about January 5, 2005, Mihai Taut allegedly sold the 2002 Pontiac to defendant **Daniel Pascu**.
3. On or about January 15, 2005, defendant **Daniel Pascu** obtained insurance policy #G00-0779127-00 with the Coast National Insurance Company (Bristol West) for the 2002 Pontiac.
4. Sometime before February 15, 2005, a person known to the Grand Jury obtained a 1984 Honda Accord.

5. On or about February 15, 2005, a person known to the Grand Jury obtained insurance policy #RDY439704 with the Young American Insurance Company for the 1984 Honda Accord.
6. On or about March 12, 2005, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2002 Pontiac Grand Prix and the 1984 Honda Accord that included defendant **Daniel Pascu** and a person known to the Grand Jury.
7. During the period of on or about March 14, 2005 through July 14, 2005, Chirocare Pain & Injury, and others associated with the clinic, caused medical and billing records to be prepared on defendant **Daniel Pascu** and sent the records to Trey Allen, P.C.
8. On or about March 14, 2005, an employee of the Trey Allen Law Firm caused a representation letter to be sent to Rodney D. Young (Young American Insurance) advising them of the representation of defendant **Daniel Pascu**.
9. On or about August 19, 2005, an employee of the Trey Allen Law Firm caused a representation letter, advising them of the representation of defendant **Daniel Pascu** and demand for medical reimbursement to be sent to Coast National Insurance Company (Bristol West).
10. On or about September 16, 2005, the Trey Allen Law Firm caused Bristol West Insurance to mail them a settlement check, payable to Trey Allen and **Daniel Pascu**, in the amount of \$3,963 in settlement of defendant **Daniel Pascu's** fraudulent medical claims.
11. On or about September 27, 2005, the Trey Allen Law Firm issued a check, from the Trey Allen Law Firm IOLTA account, in the amount of \$1,585, and gave the check to defendant **Daniel Pascu** in settlement of his fraudulent claims.
12. On or about September 28, 2005, the Trey Allen Law Firm deposited the Bristol West settlement check into the Trey Allen Law Firm Compass Bank IOLTA account.
13. On or about October 17, 2005, defendant **Daniel Pascu** cashed the Trey Allen Law Firm IOLTA account settlement check at Compass Bank.

Staged Accident R (March 17, 2005)

1. Sometime prior to the alleged accident, defendant **Andy Nguyen** recruited a person known to the Grand Jury to participate in the staged accident scheme.
2. On or about June 14, 2003, Mihai Taut purchased a salvaged 1996 Dodge Caravan.
3. On or about June 30, 2003, Mihai Taut allegedly sold the 1996 Dodge Caravan to Auto Auctions.
4. On or about July 1, 2003, defendant **Andy Nguyen** purchased the 1996 Dodge Caravan from Auto Auctions and titled the vehicle in Arkansas using defendant **Gabriel Buriman's** Little Rock Arkansas Post Office box.
5. On or about August 10, 2004, defendant **Andy Nguyen** gave the 1996 Dodge Caravan to an unindicted coconspirator known to the Grand Jury.
6. Sometime prior to the alleged accident, a person known to the Grand Jury was given money by defendant **Andy Nguyen**, and was instructed to use the money to purchase insurance for his 1988 Chevy Suburban.
7. On or about March 1, 2005, defendant **Manuel Herrera** drove a person known to the Grand Jury to obtain American Century insurance policy #TXP3032724-1 for the 1988 Chevy Suburban.
8. On or about March 7, 2005, defendant **Jackson Nguyen** obtained Unitrin insurance policy #CGNCNT1816179-00 for the 1996 Dodge Caravan.
9. On or about March 17, 2005, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 1996 Dodge Caravan and the 1988 Chevy Suburban and five participants, including himself and defendants **Jackson Nguyen**, an unindicted coconspirator known to the Grand Jury, and two persons known to the Grand Jury.
10. During the period of on or about March 18, 2005 through June 3, 2005, Chirocare Pain & Injury, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Andy Nguyen**, **Jackson Nguyen**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury.

11. On or about March 21, 2005, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the American Century Insurance Company advising them of the representation of defendants **Andy Nguyen, Jackson Nguyen**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury.
12. On or about April 29, 2005, American Century Insurance Company (ACCC General) mailed a settlement check, payable to an unindicted coconspirator known to the Grand Jury, in the amount of \$3,687 in settlement of the damages caused to the 1988 Dodge Caravan.
13. On or about June 1, 2005, representatives of Unitrin SIU met with Trey Allen Law Firm employees and defendant **Andy Nguyen** to discuss the accident. At the conclusion of the discussion, the representatives met with attorney Trey Allen, and advised Trey Allen that **Andy Nguyen** had been involved in nine other accidents.
14. On or about July 21, 2005, the Trey Allen Law Firm caused an insurance claim, #P0600446-9, and demand letters to be sent to the American Century Insurance Company on behalf of defendants **Andy Nguyen, Jackson Nguyen**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury.
15. On or about October 31, 2005, the Trey Allen Law Firm caused the American Century Insurance Company to mail settlement checks to them, payable to Trey Allen and defendants **Andy Nguyen, Jackson Nguyen**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury, in settlement of their fraudulent claims.
16. On or about November 4, 2005, an employee of the Trey Allen Law Firm caused a representation letter to be sent to Unitrin Insurance Company advising them of the representation of defendants **Andy Nguyen, Jackson Nguyen**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury.
17. On or about November 4, 2005, the Trey Allen law Firm caused an insurance claim, #500139295, and demand letters to be sent to Unitrin Insurance Company on behalf of defendants **Andy Nguyen, Jackson Nguyen**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury.
18. On or about November 4, 2005, the Trey Allen Law Firm caused settlement checks to be issued from the Trey Allen Law Firm IOLTA account, payable

to an unindicted coconspirator known to the Grand Jury in the amount of \$2,000; to defendants **Andy Nguyen**, \$1,680; **Jackson Nguyen**, \$2,000; and a person known to the Grand Jury, \$1,550 in settlement of their fraudulent claims.

19. On or about November 11, 2005, the Trey Allen Law Firm caused the American Century checks to be deposited into the Trey Allen Law Firm Compass Bank IOLTA account

Staged Accident S (May 8, 2005)

1. On or about November 23, 2004, defendant **Andy Nguyen** purchased a salvaged 2004 Hyundai Accent and titled the vehicle in Texas.
2. On or about April 20, 2005, an unindicted coconspirator known to the Grand Jury obtained a Texas driver license.
3. On or about April 23, 2005, defendant **Andy Nguyen** sold the 2004 Hyundai to defendant **Daniel Covaci** for \$1,000.
4. On or about May 2, 2005, defendant **Daniel Covaci** obtained Texas County Mutual (State Farm) insurance policy #6878-75-65 for the 2004 Hyundai.
5. On or about May 3, 2005, an unindicted coconspirator known to the Grand Jury obtained an A-Affordable Insurance Company (Old American) insurance policy #TXB13264900, for a 1982 Dodge Ram van.
6. On or about May 8, 2005, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2004 Hyundai and the 1982 Dodge Ram and five participants, including himself, defendants **Daniel Covaci**, **Benjamin Covaci**, a person known to the Grand Jury and an unindicted coconspirator known to the Grand Jury.
7. During the period of on or about May 9, 2005 through August 11, 2005, M&D Chiropractic, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Andy Nguyen**, **Daniel Covaci**, **Benjamin Covaci**, and a person known to the Grand Jury, and sent the records to the Trey Allen law firm.
8. On or about May 11, 2005, an employee of the Trey Allen Law Firm caused a representation letter to be sent to the A-Affordable Insurance Company (Old American), advising them of the representation of

defendants **Andy Nguyen, Daniel Covaci, Benjamin Covaci**, and a person known to the Grand Jury.

9. On or about June 9, 2005, the Trey Allen Law Firm caused Old American Insurance Company to mail a settlement check to them payable to the Trey Allen Law Firm and **Daniel Covaci**, in the amount of \$8,266.48, in settlement of defendant **Daniel Covaci's** fraudulent damages caused to the 2004 Hyundai.
10. On or about September 12, 2005, the Trey Allen Law Firm caused an insurance claim, #TXB13264900-501 and demand letters to be sent to the A-Affordable Insurance Company (Old American) on behalf of defendants **Andy Nguyen, Daniel Covaci, Benjamin Covaci**, and a person known to the Grand Jury.
11. On or about April 6, 2006, the Trey Allen Law Firm caused a letter to be sent to the A-Affordable Insurance Company (Old American) withdrawing from the case.

Staged Accident T (January 18, 2006)

1. On or about November 18, 2005, defendant **Daniel Covaci**, purchased (\$1,050) a 2000 Ford Windstar from an unindicted coconspirator known to the Grand Jury.
2. On or about November of 2005, defendant **Daniel Covaci** obtained a Farmers Insurance policy for the 2000 Ford Windstar.
3. On or about January 17, 2006, defendant **Jesus Huerta** obtained an Allstate Insurance policy, #4531657379, for his 2005 GMC Sierra.
4. On or about the morning of January 18, 2006, defendant **Jesus Huerta** cancelled his previously held insurance policy on his 2005 GMC Sierra, issued by State Farm Insurance Company.
5. On or about January 18, 2006, defendant **Andy Nguyen** staged an automobile accident allegedly involving the 2000 Ford Windstar and the 2005 GMC Sierra and five participants, including himself, defendants **Daniel Covaci, Jesus Huerta**, and two persons known to the Grand Jury.
6. During the period of on or about January 20, 2006 through February 16, 2006, defendant **Daniel Covaci** rented a replacement vehicle from

defendant **Nona Taut** for \$170 per week, and submitted the receipt to the State Farm Insurance Company for reimbursement.

7. During the period of on or about January 19, 2006 through April 3, 2006, Injury Plus Pain Clinic, and others associated with the clinic, caused medical and billing records to be prepared on defendants **Andy Nguyen**, **Daniel Covaci**, and a person known to the Grand Jury, and then sent the records to the Abbott Law Firm.
8. On or about June 23, 2006, The Abbott Law Firm caused representation letters to be sent to the State Farm Insurance Company advising them of the representation of defendants **Andy Nguyen**, **Daniel Covaci**, and a person known to the Grand Jury.
9. During the period of on or about February 27, 2006 through March 8, 2006, the Abbott Law Firm caused the State Farm Insurance Company to mail checks to them in settlement of the fraudulent claims filed by defendants **Andy Nguyen**, **Daniel Covaci**, and a person known to the Grand Jury .

In addition, the Grand Jury hereby realleges and incorporates, by reference herein, all of the allegations set forth in Counts two through seventy-two of this Indictment, as overt acts of this conspiracy.

In violation of 18 U.S.C. § 1349 [18 U.S.C. §§ 1341 and 1347].

Counts Two thru Forty-Two
Mail Fraud; Aiding and Abetting
(Violations of 18 U.S.C. §§ 1341 and 2)

The Grand Jury re-alleges and incorporates the Introduction and the allegations in Count 1 of this Indictment as if fully set forth herein.

On or about the dates indicated below for each count listed below, in the Northern District of Texas, the defendants listed below, aided and abetted by each other and persons known and unknown to the Grand Jury, having devised a scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing and attempting to execute such scheme, knowingly caused the matters listed below to be sent and delivered by mail, within the Northern District of Texas, according to the directions thereon:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>DESCRIPTION OF MATTER MAILED</u>	<u>ACC.</u>
2	10/21/2002	Phuong Truong Andy Nguyen	Nationwide Insurance settlement check in the amount of \$6,500, payable to Phuong Truong Andy Nguyen and Vaughan de Kirby.	A
3	10/21/2002	Toan Nguyen Andy Nguyen	Nationwide Insurance settlement check in the amount of \$6,500, payable to Toan Nguyen and Vaughan de Kirby.	A
4	10/21/2002	Jackson Nguyen Andy Nguyen	Nationwide Insurance settlement check in the amount of \$7,500, payable to Jackson Nguyen , an unindicted coconspirator and Vaughan de Kirby.	A

5	10/21/2002	Andy Nguyen Phuong Truong	Nationwide Insurance settlement check in the amount of \$7,500, payable to Andy Nguyen Phuong Truong and Vaughan de Kirby.	A
6	10/29/2002	Gabriel Buriman Andy Nguyen	Nationwide Insurance settlement check in the amount of \$6,273, payable to Gabriel Buriman .	A
7	11/22/2002	Toan Nguyen Andy Nguyen Phuong Truong	State Farm Insurance Settlement check in the amount of \$17,986.63, payable to John Allen and Toan Nguyen .	C
8	3/12/2003	Phuong Truong Andy Nguyen	State Farm Insurance settlement check in the amount of \$4,084, payable to Phuong Truong and John Allen III.	B
9	3/12/2003	Tay Tran Andy Nguyen	State Farm Insurance settlement check in the amount of \$3,735, payable to Tay Tran and John Allen III.	B
10	3/12/2003	Andy Nguyen	State Farm Insurance settlement check in the amount of \$3,842, payable to Andy Nguyen and John Allen III.	B
11	3/13/2003	Nona Taut Andy Nguyen	State Farm Insurance Settlement check in the amount of \$7,343, payable to Nona Taut .	C
12	6/19/2003	To Ngo Andy Nguyen	Farmers Insurance settlement check in the amount of \$3,366, payable to To Ngo and John Allen III.	C
13	9/10/2003	Tereza Oancea Andy Nguyen	State Farm Insurance settlement check in the amount of \$8,973.13, payable to Tereza Oancea .	D
14	9/10/2003	Clement Oancea Andy Nguyen	State Farm Insurance settlement check in the amount of \$7,802, payable to Clement Oancea .	D
15	10/11/2003	Jackson Nguyen Andy Nguyen	Safeco Insurance settlement check in the amount of \$20,000, payable to Rad Law Firm and Jackson Nguyen .	E
16	10/11/2003	Andy Nguyen	Safeco Insurance settlement check in the amount of \$8,500, payable to Rad Law Firm	E

and **Andy Nguyen**.

17	11/14/2003	Cindy Nguyen Andy Nguyen	State Farm Insurance settlement check in the amount of \$6,000, payable to John H. Allen, III and Cindy Nguyen .	D
	11/14/2003	Anh Nguyen Andy Nguyen	State Farm Insurance settlement check in the amount of \$10,000, payable to John H. Allen, III and Anh Nguyen .	D
18	2/22/2004	Andy Nguyen To Ngo	State Farm Insurance settlement check in the amount of \$5,000, payable to the Law Office of John H. Allen, III and To Ngo .	I
19	2/23/2004	Tim Ngo Andy Nguyen	Progressive Insurance settlement check in the amount of \$5,018, payable to Chirocare Pain & Injury Clinic.	F
20	3/30/2004	Huy Tran Andy Nguyen	Progressive Insurance settlement check in the amount of \$7,000, payable to Huy Tran and John H. Allen, III.	H
21	3/30/2004	Toan Nguyen Andy Nguyen	Progressive Insurance settlement check in the amount of \$7,000, payable to Toan Nguyen and John H. Allen, III.	H
22	4/23/2004	Jackson Nguyen Andy Nguyen	State Farm Insurance settlement check in the amount of \$6,000, payable to Law Office of John H. Allen, III and Jackson Nguyen .	G
23	6/4/2004	Gabriel Buriman Andy Nguyen	Progressive Insurance settlement check in the amount of \$5,018, payable to Gabriel Buriman .	K
24	6/4/2004	Dorina Buriman Andy Nguyen	Progressive Insurance settlement check in the amount of \$5,018, payable to Dorina Buriman .	K
25	9/7/2004	Ovidiu Taut Nona Taut Andy Nguyen	Coast National Insurance Company (Bristol West) settlement check in the amount of \$2,250, payable to Rad Law Firm and Ovidui Taut and Nona Taut .	J

	9/7/2004	Nona Taut Ovidiu Taut Andy Nguyen	Coast National Insurance Company (Bristol West) settlement check in the amount of \$2,050, payable to Rad Law Firm and Nona Taut and Ovidiu Taut .	J
	9/7/2004	Daniel Pascu Andy Nguyen	Coast National Insurance Company (Bristol West) settlement check in the amount of \$2,000, payable to Rad Law Firm and Daniel Pascu .	J
26	10/5/2004	Toan Nguyen Andy Nguyen	Farmers Insurance settlement check in the amount of \$9,791.56, payable to Toan Nguyen and Law Offices of Trey Allen.	M
27	1/10/2005	Phuong Truong Andy Nguyen	A-Affordable Insurance Company (Old American) settlement check in the amount of \$6,600, payable to Phuong Truong and Trey Allen.	L
	1/10/2005	Huy Tran Andy Nguyen	A-Affordable Insurance Company (Old American) settlement check in the amount of \$5,500, payable to Huy Tran and Trey Allen.	L
28	1/21/2005	Andy Nguyen	Farmers Insurance settlement check in the amount of \$3,949, payable to Andy Nguyen and Trey Allen.	M
29	2/10/2005	Joe Nguyen Andy Nguyen	Safeco Insurance settlement check in the amount of \$5,028, payable to Pham & Associates and Joe Nguyen .	F
30	2/10/2005	Daniel Pascu Andy Nguyen	Safeco Insurance settlement check in the amount of \$5,028, payable to Pham & Associates and Daniel Pascu .	F
31	2/10/2005	Nona Taut Andy Nguyen	Safeco Insurance settlement check in the amount of \$5,028, payable to Pham & Associates and Nona Taut .	F
32	2/10/2005	Ovidiu Taut Andy Nguyen	Safeco Insurance settlement check in the amount of \$5,028, payable to Pham & Associates and Ovidiu Taut .	F

33	4/19/2005	Phuong Truong Andy Nguyen	de Kirby & Associates caused a demand letter to be mailed to the Allstate Insurance Company in reference to Phuong Truong .	O
34	4/27/2005	Toan Nguyen Andy Nguyen	de Kirby & Associates caused a demand letter to be mailed to the Allstate Insurance Company in reference to Toan Nguyen .	O
35	7/12/2005	Ovidiu Taut Andy Nguyen	Republic Group/Southern County Mutual Insurance settlement check in the amount of \$4,908, payable to Trey Allen and Ovidiu Taut .	P
36	7/12/2005	Daniel Covaci Andy Nguyen	Republic Group/Southern County Mutual settlement check in the amount of \$5,058, payable to Trey Allen and Daniel Covaci .	P
37	7/12/2005	Andy Nguyen Tim Ngo	Republic Group/Southern County Mutual Insurance settlement check in the amount of \$5,115, payable to Trey Allen and a person known to the Grand Jury.	P
38	9/12/2005	Benjamin Covaci Andy Nguyen	The Trey Allen Law firm caused a demand letter to be mailed to A-Affordable Insurance Company in reference to Benjamin Covaci .	S
39	9/16/2005	Daniel Pascu Andy Nguyen	Coast National Insurance Company (Bristol West) settlement check in the amount of \$3,963, payable to Trey Allen PC and Daniel Pascu .	Q
40	10/31/2005	Andy Nguyen	American Century Insurance (ACCC General) settlement check in the amount of \$4,200, payable to Andy Nguyen and Law Offices of Trey Allen.	R
41	11/2/2005	Andy Nguyen	Coast National Insurance Company (Bristol West) settlement check in the amount of \$5,011, payable to Chris Yu and Andy Nguyen .	N
	11/2/2005	Daniel Pascu Andy Nguyen	Coast National Insurance Company (Bristol West) settlement check in the amount of \$5,011, payable to Chris Yu and Daniel Pascu .	N

	11/2/2005	Daniel Covaci Andy Nguyen	Coast National Insurance Company (Bristol West) settlement check in the amount of \$5,011, payable to Chris Yu and Daniel Covaci .	N
42	3/1/2006	Jesus Huerta Andy Nguyen	State Farm Insurance settlement check in the amount of \$34,912.09, payable to GMAC.	T

Each in violation of 18 U.S.C. § 1341 and 2.

Count Forty-Three
Conspiracy to Launder Money
(Violations of 18 U.S.C. § 1956(h))

The Grand Jury re-alleges and incorporates the Introduction and the allegations in Count 1 of this Indictment as if fully set forth herein.

Beginning on a date unknown to the Grand Jury, but continued from or about January 2000, to the present date, in the Dallas Division of the Northern District of Texas and elsewhere defendants **Andy Nguyen, Gabriel Buriman, To Ngo, Anh Nguyen, Cindy Nguyen, Joe Nguyen, Jackson Nguyen, Toan Nguyen, Tereza Oancea, Daniel Pascu, Ovidiu Taut, Tay Tran, Huy Tran, Phuong Truong,** and others known and unknown to the Grand Jury, knowingly, willfully and unlawfully combined, conspired, confederated and agreed with each other to commit certain offenses against the United States, to wit: to knowingly and willfully conduct and attempt to conduct financial transactions, with the knowledge that the property used in these financial transactions represented the proceeds of some form of unlawful activity, and which in fact represented the proceeds of a specified unlawful activity, to wit: mail fraud with the intent to a) promote the carrying on of such specified unlawful activity, and b) to conceal and disguise the nature, source, location, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

Manner and Means of the Conspiracy

It was part of the conspiracy to launder money that one or more of the defendants and others would and did the following:

1. Defendant **Andy Nguyen** was the principal architect of the staged accident activity. Defendant **Andy Nguyen**, aided and abetted by other coconspirators, planned the accident activity, recruited and paid accident participants, provided automobiles, and funding for automobile insurance, arranged for chiropractic doctors and chiropractic facilities to be utilized by the accident participants, made arrangements with paralegals and law firms for legal representation for the accident participants, and controlled the funds generated by the activity and the participants.
2. Defendant **Andy Nguyen**, knowing that the property involved in a financial transaction represented the proceeds of an unlawful activity, conducted financial transactions involving the proceeds of an unlawful activity with the intent to promote the carrying on of the unlawful activity and/or knowing the transaction was designed to conceal or disguise the nature, the location, the source, the ownership, or control of the proceeds of the unlawful activity, directed coconspirator defendants **Phuong Truong, Cindy Nguyen, Gabriel Buriman, Ovidiu Taut, Tay Tran, Jackson Nguyen**, and others, known and unknown to the Grand Jury, to unlawfully utilize their personal checking accounts as part of the conspiracy to launder money.
3. The coconspirators would and did conduct various transactions through their personal checking accounts in order to divide among themselves fraudulently obtained insurance proceeds, to promote the scheme to defraud insurance companies, and to conceal the fraudulently obtained insurance proceeds.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, and in order to affect its objects, the defendants and their coconspirators committed the following overt acts in the Dallas Division of the Northern District of Texas and elsewhere:

1. Prior to January 1, 2000, defendant **Tereza Oancea** opened a regular checking account #004778404565 at Bank of America.
2. Prior to January 1, 2000, defendants **Ovidiu** and **Nona Taut** opened a regular checking account #004773500341 at Bank of America.
3. Prior to January 1, 2000, defendant **Tay Tran** and an unindicted coconspirator known to the Grand Jury opened a checking account #001631300474 with NationsBank, which subsequently became Bank of America.
4. Prior to January 1, 2000, an unindicted coconspirator known to the Grand Jury opened a Gold Star checking account #78078007 at the Educational Employee's Credit Union (EECU).
5. On or about March 2, 2000, defendant **Cindy Nguyen** opened a student personal checking account #001631862317 at Bank of America.
6. On or about September 7, 2001, defendant **Phuong Truong** opened a regular savings account #004792659710 at Bank of America.
7. On or about September 10, 2001, defendants **Gabriel** and **Dorina Buriman** opened a joint checking account #0393-069606-4 at Washington Mutual Bank.
8. On or about April 13, 2002, an unindicted coconspirator known to the Grand Jury opened a savings account #96083116 at EECU.
9. On or about December 3, 2002, defendant **Cindy Nguyen** opened a regular checking account #004799128671 at Bank of America.
10. On or about March 19, 2003, defendant **Phuong Truong** opened a regular checking account #004793967692 at Bank of America.

Staged Accident A (June 22, 2002)

1. On or about August 8, 2002, defendant **Toan Nguyen** endorsed a State Farm settlement check in the amount of \$17,328.27, and defendant **Phuong Truong** deposited the State Farm check into her checking account #004792659710 at Bank of America.
2. On or about August 14, 2002, defendant **Phuong Truong** withdrew \$5,500 from her Bank of America account on behalf of defendant **Andy Nguyen**.

3. On or about August 15, 2002, defendant **Phuong Truong** withdrew \$5,300 from her Bank of America account on behalf of defendant **Andy Nguyen**.
4. On or about August 21, 2002, defendant **Phuong Truong** withdrew \$5,000 from her Bank of America account on behalf of defendant **Andy Nguyen**.
5. On or about October 28, 2002, defendants **Andy Nguyen, Jackson Nguyen, and Phuong Truong** endorsed de Kirby & Associates IOLTA checks totaling \$22,984, and **Phuong Truong** deposited the checks into her Bank of America checking account #004792659710.
6. On or about November 4, 2002, defendant **Gabriel Buriman** endorsed a Nationwide Insurance settlement check in the amount of \$6,273 and deposited the check into his checking account #393-069606-4 at Washington Mutual. **Gabriel Buriman** then withdrew \$5,300 from the account on behalf of defendant **Andy Nguyen**.
7. On or about December 5, 2002, defendant **Phuong Truong** withdrew \$13,410 from her Bank of America checking account and purchased 3 cashier's checks for defendant **Andy Nguyen**. The cashier's checks were in the amounts of \$4,670, \$4,170, and \$4,570; totaled \$13,410 and were payable to Co Part.
8. On or about December 5, 2002, defendant **Andy Nguyen** used the cashier's check in the amount of \$4,670, to purchase a 2000 Honda Passport from CoPart auto Auction. This vehicle was subsequently used in Staged Accident D.
9. On or about December 5, 2002, defendant **Andy Nguyen** used the cashier's check in the amount of \$4,170, to purchase a 2003 Mitsubishi Eclipse from CoPart auto Auction.
10. On or about December 5, 2002, defendant **Andy Nguyen** used the cashier's check in the amount of \$4,570, to purchase a 2000 Mitsubishi Eclipse from CoPart auto Auction.
11. On or about December 12, 2002, defendant **Phuong Truong** gave a check, drawn on her personal Bank of America checking account, in the amount of \$1,761.00, to defendant **Gabriel Buriman**, the driver of the other vehicle involved in the staged accident.

Staged Accident B (October 8, 2002)

1. On or about March 19, 2003, an unindicted coconspirator known to the Grand Jury and defendants **Phuong Truong** and **Andy Nguyen**, endorsed State Farm settlement checks totaling \$12,926, and defendant **Phuong Truong** deposited the checks into her Bank of America checking account #004792659710.
2. On or about March 26, 2003, defendant **Phuong Truong** withdrew \$13,000 from her Bank of America account and purchased a cashier's check payable to CoPart, on behalf of defendant **Andy Nguyen**.
3. On or about March 26, 2003, defendant **Andy Nguyen** used the \$13,000 cashier's check to purchase a 2002 Isuzu Axiom from CoPart Auto Auction, under the Mihai Taut Buyer's License.
4. On or about June 19, 2003, defendant **Tay Tran** and an unindicted coconspirator known to the Grand Jury endorsed and deposited two Trey Allen Law Firm settlement checks, in the amounts of \$1,816 and \$1,664 respectively, which totaled \$3,480, into their Bank of America account #001631300474.
5. On or about June 24, 2003, an unindicted coconspirator known to the Grand Jury wrote check #1058, in the amount of \$2,080, payable to defendant **Phuong Truong**. **Phuong Truong** negotiated for cash and then deposited the cash into her Bank of America account 004792659710.

Staged Accident C (November 17, 2002)

1. On or about June 27, 2003, defendant **Toan Nguyen** endorsed, and defendant **Phuong Truong** deposited, a Farmers Insurance settlement check in the amount of \$3,072, into her Bank of America account #004792659710.
2. On or about June 30, 2003, defendant **To Ngo** endorsed and defendant **Phuong Truong** deposited a Farmers Insurance settlement check, in the amount of \$3,366, into her Bank of America account #004792659710.
3. On or about June 30, 2003, defendant **Phuong Truong** withdrew \$1,510 from the Bank of America account and purchased a \$1,510 cashier's check payable to CoPart on behalf of defendant **Andy Nguyen**.

4. On or about June 30, 2003, defendant **Andy Nguyen** used the \$1,510 cashier's check to purchase a 2003 Nissan Xterra from CoPart Auto Auction, under the Mihai Taut Buyer's License, which was subsequently used in Staged Automobile Accident I.
5. On or about July 7, 2003, defendant **Phuong Truong** withdrew \$4,065 from the Bank of America account and purchased a \$3,045 cashier's check payable to CoPart on behalf of defendant **Andy Nguyen**, and also received \$1,020 in currency on behalf of **Andy Nguyen**.
6. On or about July 7, 2003, defendant **Andy Nguyen** used the \$3,045 cashier's check to purchase a 2000 Chrysler Town & Country van from CoPart Auto Auction.

Staged Accident D (May 18, 2003)

1. On or about June 2, 2003, defendant **Cindy Nguyen** endorsed and deposited a State Farm settlement check, in the amount of \$16,991.99, into her Bank of America bank account.
2. On or about June 10, 2003, defendant **Cindy Nguyen** withdrew \$7,000 from her Bank of America checking account by issuing check #650, made payable to defendant **Andy Nguyen**.
3. On or about June 10, 2003, defendant **Andy Nguyen** negotiated check #650 for cash.
4. On or about June 12, 2003, defendant **Phuong Truong** withdrew \$6,345 from her Bank of America checking account and purchased a cashier's check in the amount of \$6,345, payable to CoPart, on behalf of defendant **Andy Nguyen**.
5. On or about June 12, 2003, defendant **Andy Nguyen** used the cashier's check to purchase a 2001 Dodge Caravan from CoPart Auto Auction, under the Mihai Taut Buyer's License, which was subsequently used in staged Accident K.
6. On or about June 13, 2003, defendant **Cindy Nguyen** withdrew \$7,000 from her Bank of America checking account by issuing check #651, made payable to defendant **Andy Nguyen**.

7. On or about June 13, 2003, defendant **Andy Nguyen** endorsed check #651 and defendant **Phuong Truong** deposited \$6,500 of the check into her Bank of America checking account #004792659710.
8. On or about September 16, 2003, defendants **Clement Oancea** and **Tereza Oancea** endorsed and deposited three State Farm Insurance settlement checks, totaling \$11,653, into **Tereza Oancea's** Bank of America account #004778404565.
9. On or about September 16, 2003, defendant **Tereza Oancea** endorsed and deposited a State Farm Insurance settlement check, in the amount of \$8,973.13, into **Tereza Oancea's** Bank of America account #004778404565.
10. On or about September 24, defendant **Tereza Oancea** wrote check #754 in the amount of \$15,000, payable to cash, which she negotiated for cash.
11. On or about November 24, 2003; defendant **Anh Nguyen** endorsed a John Allen, P.C. IOLTA settlement check, in the amount of \$9,000, and defendant **Cindy Nguyen** deposited the check into her Bank of America checking account #004799128671.
12. On or about November 24, 2003, defendant **Cindy Nguyen** withdrew \$3,000 from her Bank of America checking account by issuing check #726, made payable to defendant **Phuong Truong**.
13. On or about November 24, 2003, defendant **Phuong Truong** negotiated check #726 on behalf of defendant **Andy Nguyen**.
14. On or about November 25, 2003, defendant **Cindy Nguyen** withdrew \$6,000 from her Bank of America checking account by issuing check #727, made payable to defendant **Andy Nguyen**, which **Andy Nguyen** negotiated for cash.

Staged Accident E (May 21, 2003)

1. On or about July 30, 2003, defendant **Andy Nguyen** endorsed a Safeco Insurance settlement check, in the amount of \$10,000 and defendant **Cindy Nguyen** deposited the check into her Bank of America checking account.
2. On or about July 31, 2003, defendant **Cindy Nguyen** withdrew \$1,000 from her Bank of America checking account by issuing check #674, made payable to defendant **Andy Nguyen**.

3. On or about July 31, 2003, defendant **Andy Nguyen** negotiated check #674 for cash.
4. On or about August 4, 2003, defendant **Cindy Nguyen** withdrew \$4,000 from her Bank of America checking account by issuing check #675, made payable to defendant **Phuong Truong**.
5. On or about August 4, 2003, defendant **Phuong Truong** negotiated check #675 on behalf of defendant **Andy Nguyen**.
6. On or about August 4, 2003, defendant **Cindy Nguyen** withdrew \$4,200 from her Bank of America checking account by issuing check #676, made payable to defendant **Phuong Truong**.
7. On or about August 4, 2003, defendant **Phuong Truong** negotiated check #676 on behalf of defendant **Andy Nguyen**.
8. On or about August 4, 2003, defendant **Cindy Nguyen** withdrew \$800 from her Bank of America checking account by issuing check #677, made payable to defendant **Phuong Truong**.
9. On or about August 4, 2003, defendant **Phuong Truong** deposited check #677 into her Bank of America checking account.
10. On or about August 14, 2003, defendant **Andy Nguyen** endorsed a Safeco Insurance settlement check in the amount of \$6,445 and defendant **Cindy Nguyen** deposited the Safeco check into her Bank of America checking account 004799128671.
11. On or about August 15, 2003, defendant **Cindy Nguyen** withdrew \$6,445 from her Bank of America checking account by issuing check #683, made payable to defendant **Andy Nguyen**.
12. On or about August 18, 2003, defendant **Andy Nguyen** negotiated check #683 and received \$3,445 in cash and a \$3,000 cashier's check made payable to **Andy Nguyen**.
13. On or about October 31, 2003, defendants **Jackson Nguyen** and **Andy Nguyen** endorsed John Allen IOLTA settlement checks, totaling \$7,587.15, and defendant **Phuong Truong** deposited the John Allen checks into her Bank of America checking account #004793967692.

14. On or about November 5, 2003, defendant **Phuong Truong** withdrew \$5,037 in cash, from her Bank of America checking account on behalf of defendant **Andy Nguyen**.
15. On or about November 17, 2003, defendants **Tay Tran** and **Andy Nguyen** endorsed a Safeco settlement check, in the amount of \$1,675, and defendant **Cindy Nguyen** deposited the check into her Bank of America checking account #4799128671.
16. November 18, 2003, defendant **Cindy Nguyen** issued check #597, from her Bank of America account, in the amount of \$1,675, payable to cash, and negotiated the check on behalf defendant **Andy Nguyen**.

Staged Accident F (September 13, 2003)

1. On or about September 30, 2003, defendant **Joe Nguyen** endorsed a Progressive Insurance settlement check, in the amount of \$7,331.00, and defendant **Ovidiu Taut** deposited the Progressive check into his Bank of America checking account #004773500341.
2. On or about October 1, 2003, defendant **Ovidiu Taut** transferred \$3,897 from his Bank of America checking account into another Bank of America account maintained by **Ovidiu Taut**.
3. During the period of on or about October 2, 2003 through October 6, 2003, defendant **Ovidiu Taut** withdrew cash, in amounts totaling \$3,400, from his Bank of America bank checking account, on behalf of defendant **Andy Nguyen**.
4. On or about March 4, 2005, defendant **Nona Taut** endorsed and deposited a Pham & Associates, P.C. settlement check into her Bank of America checking account #004773500341.
5. On or about March 7, 2005, a \$3,200 cash withdrawal was made from account #004773500341 on behalf of defendant **Andy Nguyen**.

Staged Accident G (October 19, 2003)

1. On or about October 30, 2003, State farm Insurance Company mailed a settlement check, in the amount of \$11,336.34, to defendant **Jackson Nguyen** in settlement of his fraudulent claim on the 2003 Chevy Cavalier.

2. On or about October 30, 2003, defendant **Cindy Nguyen** deposited the State Farm check into her Bank of America checking account #004799128671, and issued checks #717 in the amount of \$8,000 and #718 in the amount of \$3,000, both payable to defendant **Phuong Truong**.
3. On or about November 3, 2003, defendant **Phuong Truong** negotiated the two checks written by defendant **Cindy Nguyen**, on behalf of defendant **Andy Nguyen**.

Staged Accident H (November 1, 2003)

1. On or about January 9, 2004, defendants **Toan Nguyen** and **Phuong Truong** endorsed a Trey Allen IOLTA settlement check in the amount of \$13,004.14, and **Phuong Truong** deposited the check into her Bank of America checking account #4793967692.
2. On or about January 13, 2004, defendant **Phuong Truong** withdrew \$12,700 from her checking account and purchased a cashier's check in the amount of \$12,700, payable to CoPart on behalf of **Andy Nguyen**.
3. On or about January 13, 2004, defendant **Andy Nguyen** used the cashier's check to purchase a 2004 Acura TSX from CoPart Auto Auction, under the Mihai Taut Buyer's License.

Staged Accident I (November 5, 2003)

1. On or about March 9, 2004, defendant **Tay Tran** provided his Texas driver license to defendant **Andy Nguyen** and/or defendant **Phuong Truong** so that the Trey Allen IOLTA check #1055, payable to **Tay Tran**, in the amount of \$5,000 could be negotiated for cash on behalf of **Andy Nguyen**.

Staged Accident J (November 14, 2003)

1. On or about February 25, 2004, defendant **Daniel Pascu** endorsed a Coast National Insurance Company (Bristol West) settlement check, in the amount of \$4,573.12, and defendant **Cindy Nguyen** deposited the Coast National Insurance Company (Bristol West) check into her Bank of America checking account 004799128671.
2. On or about March 2, 2004, defendant **Cindy Nguyen** withdrew \$4,500 from her Bank of America checking account by issuing check #758, made payable to defendant **Phuong Truong**.

3. On or about March 2, 2004, defendant **Phuong Truong** negotiated check #758 for cash, and gave the money to defendant **Andy Nguyen**.

Staged Accident L (June 29, 2004)

1. On or about December 1, 2004, defendant **Huy Tran** endorsed a Farmers Insurance settlement check, in the amount \$3,840.00 and defendant **Phuong Truong** deposited the Farmers' check into her Bank of America checking account 004793967692.
2. On or about December 2, 2004, defendant **Phuong Truong** deposited a Farmers Insurance settlement check, in the amount of \$4,931.88, into her Bank of America checking account 004793967692.
3. During the period of on or about December 3, 2004 through December 14, 2004, defendant **Phuong Truong** withdrew \$6,800.00 in cash, from her Bank of America checking account, and gave the funds to defendant **Andy Nguyen**.

Staged Accident M (August 16, 2004)

1. On or about October 14, 2004, defendant **Toan Nguyen** endorsed a Farmers Insurance settlement check in the amount of \$9,791.56. Defendant **Phuong Truong** deposited the check into her Bank of America account #004793967692.
2. On or about October 21, 2004, defendant **Phuong Truong** withdrew \$5,000 in cash from her Bank of America account on behalf of defendant **Andy Nguyen**.
3. On or about October 25, 2004, defendant **Phuong Truong** withdrew \$4,000 in cash from her Bank of America account on behalf of defendant **Andy Nguyen**.

Stage Accident R (March 17, 2005)

1. On or about May 4, 2005, an unindicted coconspirator known to the Grand Jury endorsed an American Century (ACCC General) settlement check in the amount of \$3,687. Defendant **Phuong Truong** negotiated the check, deposited \$1,000 into the unindicted coconspirator's EECU account, and received \$2,687 in cash.

2. On or about May 5, 2005, defendant **Phuong Truong** deposited \$2,260 in cash into the same EECU account and obtained a cashier's check in the amount of \$3,660, payable to IAA (Insurance Auto Auctions) on behalf of Andy Auto Sales (defendant **Andy Nguyen**).

In violation of 18 U.S.C. § 1956(h).

Counts Forty-Four thru Seventy
 Money Laundering; Aiding and Abetting
 (Violations of 18 U.S.C. §§ 1956(a)(1)(A)(i); 1956(a)(1)(B)(i) and 2)

The Grand Jury re-alleges and incorporates the Introduction and the allegations in Count 1 of this Indictment as if fully set forth herein.

On or about the dates listed below corresponding to each Count, in the Northern District of Texas and elsewhere, the defendants listed below, aided and abetted by each other and by persons known and unknown to the Grand Jury, did knowingly and willfully conduct and attempt to conduct financial transactions, with the knowledge that the property used in these financial transactions represented the proceeds of some form of unlawful activity, and which in fact represented the proceeds of a specified unlawful activity, to wit: mail fraud with the intent to a) promote the carrying on of such specified unlawful activity, and b) to conceal and disguise the nature, source, location, ownership, and control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i):

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>DESCRIPTION OF ACTIVITY</u>	<u>ACC</u>
44	8/8/2002	Toan Nguyen Phuong Truong Andy Nguyen	Toan Nguyen endorsed a State Farm settlement check in the amount of \$17,328.27 and Phuong Truong deposited the check into her checking account #004792659710.	A
45	8/14/2002	Andy Nguyen Phuong Truong	Phuong Truong withdrew \$5,500 from the account on behalf of Andy Nguyen .	A

46	10/28/2002	Andy Nguyen Jackson Nguyen Phuong Truong	Andy Nguyen, Jackson Nguyen, and Phuong Truong endorsed de Kirby Law Firm IOLTA checks totaling \$22,984, and Phuong Truong deposited the checks into her checking account #004792659710.	A
47	12/5/2002	Andy Nguyen Phuong Truong	Andy Nguyen used a cashier's check in the amount of \$4,670, payable to CoPart for the purchase of a 2000 Honda Passport used in accident D.	A
48	12/12/2002	Gabriel Buriman Phuong Truong	Phuong Truong wrote check #644 from her Bank of America account #004793967692, in the amount of \$1,761, payable to Gabriel Buriman , which Gabriel Buriman negotiated.	A
49	3/26/2003	Phuong Truong Andy Nguyen	Andy Nguyen used a cashier's check in the amount of \$13,000, payable to CoPart for the purchase of a 2002 Isuzu Axiom.	B
50	6/10/2003	Cindy Nguyen Andy Nguyen	Cindy Nguyen wrote check #650, in the amount of \$7,000, payable to Andy Nguyen , which Andy negotiated for cash.	D
51	6/12/2003	Phuong Truong Andy Nguyen	Andy Nguyen used the cashier's check, payable to CoPart to purchase a 2001 Dodge Caravan used in accident K.	D
52	6/13/2003	Cindy Nguyen Andy Nguyen	Cindy Nguyen wrote check #651, in the amount of \$7,000, payable to Andy Nguyen .	D
53	6/19/2003	Tay Tran Andy Nguyen Phuong Truong	Tay Tran and an unindicted coconspirator known to the Grand Jury endorsed Trey Allen IOLTA checks, in the amounts of \$1,816, and \$1,664, respectively, and the unindicted coconspirator deposited the checks into their checking account #1631300474.	B
54	6/24/2003	Andy Nguyen Phuong Truong	Phuong Truong deposited \$2,080 in cash into her checking account #4792659710, on behalf of Andy Nguyen.	B
55	6/27/2003	Toan Nguyen	Toan Nguyen endorsed and Phuong Truong	C

		Phuong Truong Andy Nguyen	deposited a Farmers settlement check in the amount of \$3,072 into her checking account #004792659710.	
56	6/30/2003	To Ngo Phuong Truong Andy Nguyen	To Ngo endorsed and Phuong Truong deposited a Farmers settlement check in the amount of \$3,366 into her checking account #004792659710.	C
57	6/30/2003	Andy Nguyen Phuong Truong	Andy Nguyen used the \$1,510 cashier's check to purchase a 2003 Nissan Xterra from CoPart Auto Auction.	C
58	7/7/2003	Andy Nguyen Phuong Truong	Andy Nguyen used the \$3,045 cashier's check to purchase a 2000 Chrysler Town & Country from CoPart Auto Auction.	C
59	7/31/2003	Cindy Nguyen Andy Nguyen	Andy Nguyen negotiated, for cash, check # 674 in the amount of \$1,000, payable to Andy Nguyen , drawn on the Cindy Nguyen account #004799128671.	E
60	8/4/2003	Phuong Truong Cindy Nguyen Andy Nguyen	Phuong Truong negotiated, for cash, check # 675 in the amount of \$4,000, payable to Phuong Truong , drawn on the Cindy Nguyen account #004799128671.	E
61	9/30/2003	Joe Nguyen Ovidiu Taut	Joe Nguyen endorsed a Progressive settlement check, in the amount of \$7,331, and Ovidiu Taut deposited the check into his checking account #004773500341.	F
62	10/30/2003	Jackson Nguyen Andy Nguyen Cindy Nguyen	Jackson Nguyen endorsed a State Farm settlement check in the amount of \$11,336.34 and Cindy Nguyen deposited the check into her checking account #004799128671.	G
63	10/30/2003	Cindy Nguyen Phuong Truong Andy Nguyen	Cindy Nguyen wrote check #717 in the amount of \$8,000 payable to Phuong Truong , who negotiated the check for cash on behalf of Andy Nguyen .	G
64	11/24/2003	Anh Nguyen	Anh Nguyen endorsed a Trey Allen Law Firm	D

		Cindy Nguyen Andy Nguyen	settlement check in the amount of \$9,000 and Cindy Nguyen deposited the check into her checking account #004799128671.	
65	11/25/2003	Andy Nguyen Cindy Nguyen	Cindy Nguyen wrote check #727, in the amount of \$6,000, payable to Andy Nguyen , which Andy Nguyen negotiated for cash.	D
66	1/9/2004	Andy Nguyen Phuong Truong Toan Nguyen	Toan Nguyen and Phuong Truong endorsed a Trey Allen IOLTA check in the amount of \$13,004.14 Phuong Truong deposited the check into her checking account #4793967692.	H
67	1/13/2004	Andy Nguyen Phuong Truong	Andy Nguyen used the cashier's check to purchase a 2004 Acura TSX from CoPart Auto Auction.	H
68	2/25/2004	Cindy Nguyen Andy Nguyen Daniel Pascu	Daniel Pascu endorsed a Coast National Insurance Company (Bristol West) settlement check, in the amount of \$4,573.12, and Cindy Nguyen deposited the check into her checking account #004799128671.	J
69	10/14/2004	Andy Nguyen Phuong Truong	A Farmers settlement check, in the amount of \$9,791.56, was deposited into Phuong Truong's checking account #004793967692.	M
70	12/1/2004	Huy Tran Phuong Truong Andy Nguyen	Huy Tran endorsed a Farmers settlement check, in the amount of \$3,840, and Phuong Truong deposited the check into her checking account #004793967692.	L

Each in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i) and 2.

Count Seventy-One
Money Laundering; Aiding and Abetting
(Violations of 18 U.S.C. §§ 1957 and 2)

The Grand Jury hereby realleges and incorporates the allegations in Count 1 of the indictment as though fully set forth herein.

On or about dates set forth below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant **Tereza Oancea**, aided and abetted by others known to the Grand Jury, did knowingly engage and attempt to engage in the following monetary transactions by, through, and to financial institutions, affecting interstate commerce, involving criminally derived property of a value greater than \$10,000:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>DESCRIPTION OF ACTIVITY</u>	<u>ACC</u>
71	9/24/2003	Tereza Oancea	Tereza Oancea wrote check #754 in the amount of \$15,000, payable to cash.	D

The above transaction involved property having been derived from a specified unlawful activity, that is mail fraud and health care fraud, in violation of 18 U.S.C. §§ 1341 and 1347,
In violation of 18 U.S.C. §§ 1957 and 2.

A TRUE BILL

FORWARDED

RICHARD B. ROPER
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "ERIN NEALY COX", written over the printed name below.

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