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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 ROGER TAM, and  
D-2 ADA MEI LEI,

Defendants.

Case:2:16-cr-20118  
Judge: Battani, Marianne O.  
MJ: Stafford, Elizabeth A.  
Filed: 02-25-2016 At 03:24 PM  
INDI USA V. TAM ET AL (NA)

**VIOLATIONS:**  
8 U.S.C. § 1324(a)(1)(A)(iii)  
8 U.S.C. § 1324(a)(1)(A)(v)(I)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

*(8 U.S.C. § 1324(a)(1)(A)(iii) – Harboring Illegal Aliens)*

D-1 ROGER TAM  
D-2 ADA MEI LEI

From an unknown date until on or about January 31, 2016, in the Eastern District of Michigan, defendants, ROGER TAM and ADA MEI LEI, knowing and in reckless disregard of the fact that an alien, namely, Brayan Medina-Contreras, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other

places for the purpose of commercial advantage and private financial gain, in violation 8 U.S.C. § 1324(a)(1)(A)(iii) and 8 U.S.C. § 1324(a)(1)(B)(i).

**COUNT TWO**

*(8 U.S.C. § 1324(a)(1)(A)(iii) – Harboring Illegal Aliens)*

D-1 ROGER TAM  
D-2 ADA MEI LEI

From an unknown date until on or about January 31, 2016, in the Eastern District of Michigan, defendants, ROGER TAM and ADA MEI LEI, knowing and in reckless disregard of the fact that an alien, namely, Leonel Alvarado-Rodriguez, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain, in violation 8 U.S.C. § 1324(a)(1)(A)(iii) and 8 U.S.C. § 1324(a)(1)(B)(i).

**COUNT THREE**

*(8 U.S.C. § 1324(a)(1)(A)(iii) – Harboring Illegal Aliens)*

D-1 ROGER TAM  
D-2 ADA MEI LEI

From an unknown date until on or about January 31, 2016, in the Eastern District of Michigan, defendants, ROGER TAM and ADA MEI LEI, knowing and in

reckless disregard of the fact that an alien, namely, Simeon Diaz-Nunez, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain, in violation 8 U.S.C. § 1324(a)(1)(A)(iii) and 8 U.S.C. § 1324(a)(1)(B)(i).

**COUNT FOUR**

*(8 U.S.C. § 1324(a)(1)(A)(iii) – Harboring Illegal Aliens)*

D-1 ROGER TAM  
D-2 ADA MEI LEI

From an unknown date until on or about January 31, 2016, in the Eastern District of Michigan, defendants, ROGER TAM and ADA MEI LEI, knowing and in reckless disregard of the fact that an alien, namely, Miguel Nunez-Diaz, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain, in violation 8 U.S.C. § 1324(a)(1)(A)(iii) and 8 U.S.C. § 1324(a)(1)(B)(i).

**COUNT FIVE**

*(8 U.S.C. § 1324(a)(1)(A)(iii) – Harboring Illegal Aliens)*

D-1 ROGER TAM  
D-2 ADA MEI LEI

From an unknown date until on or about January 31, 2016, in the Eastern District of Michigan, defendants, ROGER TAM and ADA MEI LEI, knowing and in reckless disregard of the fact that an alien, namely, Pablo Alvaro-Encino, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain, in violation 8 U.S.C. § 1324(a)(1)(A)(iii) and 8 U.S.C. § 1324(a)(1)(B)(i).

**COUNT SIX**

*(8 U.S.C. § 1324(a)(1)(A)(v)(I) – Conspiracy to Harbor Illegal Aliens)*

D-1 ROGER TAM  
D-2 ADA MEI LEI

From an unknown date until on or about January 31, 2016, in the Eastern District of Michigan and elsewhere, defendants, ROGER TAM and ADA MEI LEI, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together and with each other, and agree with other persons whose names are known and unknown to the grand jury, to commit the following offense against the United States, to wit: harboring illegal aliens for the purpose of commercial advantage and private financial gain, contrary to 8 U.S.C. § 1324(a)(1)(A)(iii), all in violation of 8 U.S.C. § 1324(a)(1)(A)(v)(I) and 8 U.S.C. § 1324(a)(1)(B)(i).

**FORFEITURE ALLEGATIONS**

Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby provides notice to the defendants of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in this Indictment.

**THIS IS A TRUE BILL.**

**s/GRAND JURY FOREPERSON**  
Grand Jury Foreperson

BARBARA L. McQUADE  
United States Attorney

**s/GARY M. FELDER**  
GARY M. FELDER  
Deputy Chief, National Security Unit  
Assistant United States Attorney

**s/BRANDON M. BOLLING**  
BRANDON M. BOLLING  
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Date:           **FEB 25**          , 2016

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United States District Court Eastern District of Michigan	<b>Criminal Case Cov</b>
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <i>BMB</i>

Case Title: USA v. Roger Tam, and Ada Mei Lei

County where offense occurred : Oakland

Check One:       **Felony**                       **Misdemeanor**                       **Petty**

- Indictment/  Information --- no prior complaint.
- Indictment/  Information --- based upon prior complaint [Case number: ] 16-mj-30059
- Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

February 25, 2016  
Date

*Brandon M. Bolling*  
 \_\_\_\_\_  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated. 10/13/09