

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA)	No: 1:19-cr-57 (LO)
)	
v.)	Count 1
)	Racketeering Conspiracy
PETER LE)	18 U.S.C. § 1962(d)
(Counts 1, 3-13, 16, 21))	
)	Count 2
ANTHONY NGUYEN THANH LE)	Violent Crimes in Aid of Racketeering
(Counts 6, 11, 12))	Assault with a Deadly Weapon
)	18 U.S.C. § 1959(a)(3)
JOSEPH DUK-HYUN LAMBORN)	
(Counts 1, 3-7, 13, 17, 20))	Count 3
)	Violent Crimes in Aid of Racketeering
TONY MINH LE)	Murder
(Counts 1, 6, 14, 15))	18 U.S.C. § 1959(a)(1)
)	
SANG THANH HUYNH)	Count 4
(Counts 1, 2, 6, 18, 22-37))	Kidnapping Conspiracy
)	18 U.S.C. § 1201(c)
YOUNG YOO)	
(Counts 1-7, 13, 19))	Count 5
)	Kidnapping Resulting in Death
SASCHA AMADEUS CARLISLE)	18 U.S.C. § 1201(a)(1)
(Counts 1, 4, 6))	
)	Count 6
Defendants.)	Narcotics Conspiracy
)	21 U.S.C. §§ 841 and 846
)	
)	Count 7
)	Killing while Engaged in Drug Trafficking
)	21 U.S.C. § 848(e)
)	
)	Counts 8-10
)	Maintaining Drug-Involved Premises
)	21 U.S.C. § 856
)	
)	Counts 11-12
)	Distribution of Controlled Substances
)	21 U.S.C. § 841
)	

-) Count 13
-) Firearms Murder
-) 18 U.S.C. § 924(j)
-)
-) Counts 14-19
-) Using, Carrying, and/or Possessing
-) Firearms and Destructive Devices
-) 18 U.S.C. § 924(c)
-)
-) Count 20
-) Obstruction of Justice
-) 18 U.S.C. § 1519
-)
-) Counts 21-37
-) Money Laundering Conspiracy and
-) Money Laundering
-) 18 U.S.C. § 1956
-)
-) Forfeiture

August 2020 Term - At Alexandria

FOURTH SUPERSEDING INDICTMENT

Count 1

**Conspiracy to Conduct and Participate
in the Conduct of an Enterprise**

THE GRAND JURY CHARGES THAT:

General Allegations

1. At all times relevant to this indictment, the Reccless Tigers, including its affiliated entities, was a violent street gang and drug trafficking organization operating in the Eastern District of Virginia and elsewhere. The defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), TONY MINH LE (a/k/a Sneaks, Sneaky, T, Tiger), SANG THANH HUYNH (a/k/a Cinco), YOUNG YOO (a/k/a YG), and SASCHA AMADEUS CARLISLE (a/k/a Sosa, Wolf) were members of this organization.

2. The Reccless Tigers were formed in or about 2011 by TONY MINH LE and a co-conspirator (CC) number 1 (CC-1). The gang grew out of smaller street gangs operating primarily in Centreville, Virginia, including the Young Korean Loks (a/k/a YKL), Korean Dragon Crew (a/k/a KDC), and Sons of Gong (a/k/a SOG). As the Reccless Tigers grew and evolved, it developed a close relationship with the Asian Boyz (a/k/a ABZ), and, specifically, the West Side Asian Boyz, a Los Angeles, California, street gang. The Reccless Tigers also formed the affiliated entities Club Tiger, Tiger Side, and Lady Tigers (a/k/a Lady Ts).

3. The Reccless Tigers and its affiliated entities trafficked in illegal narcotics, particularly marijuana and marijuana products, such as vape pens and edibles containing THC. The gang also distributed cocaine, prescription medications, ecstasy, LSD, ketamine, and heroin. The Reccless Tigers had numerous drug suppliers, and many of the drugs distributed by the gang were transported or shipped from California to Northern Virginia. Money generated from these sales was sent to California through bank deposits and withdrawals, wire transfers, and vehicles. TONY MINH LE and other gang members invested in and helped operate a marijuana grow operation of more than 1,000 marijuana plants near Hayfork, California, which they called “the farm.”

4. The Reccless Tigers openly marketed the gang and its “brand” through social media postings, house parties, product labels, t-shirts, jewelry, clothing, and business cards. Gang members adopted unique gang signs, which they displayed to show their membership in, and allegiance to, the gang. Many gang members wore tiger-themed tattoos and tattoos with the gang’s initials, RT. The gang became well known throughout secondary schools in Northern Virginia as a source of marijuana, vape pens containing THC, and other drugs, and a large

number of the gang's retail distributors and drug customers were middle school, high school, and college students.

5. The Reccless Tigers adopted many traditional gang customs and rules. Gang members were required to complete an initiation process and were "jumped in" prior to joining the gang. This involved being beaten by a number of other gang members. Members were expected to participate in fights on behalf of the gang. If a gang member failed to participate, the member was punished. Gang members were also expected to go on "missions," which typically involved violence.

6. The Reccless Tigers used violence and threats of violence to promote and protect the gang, its drug trafficking operations, and its reputation and status. The gang used violence and threats of violence to command respect and obedience from its members and associates and to enforce gang rules, collect debts, and intimidate anyone perceived to be a threat to the gang. Gang members were assaulted by other gang members when they broke rules or offended the gang's leadership. The gang engaged in frequent fights with rival local gangs, which sometimes resulted in larger melees involving dozens of gang members and exchanges of gunfire. Drug debts frequently spawned violence and threats of violence. When threats and assaults proved ineffective in collecting debts, gang members escalated the violence to fire-bombing attacks (*i.e.*, Molotov cocktails) of residences.

7. Many of the Reccless Tigers used, carried, and possessed firearms, including revolvers, semi-automatic pistols, shotguns, and assault-style rifles. They frequently posted photographs of themselves on their social media accounts possessing, carrying, and brandishing firearms. Members of the gang used, carried, and possessed firearms to defend themselves and the gang, intimidate others, and protect their drug business and drug proceeds.

8. The Reccless Tigers attempted to obstruct and obstructed investigations by law enforcement into its illegal activities. Gang members were encouraged to lie and lied to investigators when questioned about the gang. Gang members attempted to destroy and destroyed evidence of their criminal activities to thwart the investigation and prosecution of gang members. The Reccless Tigers threatened potential witnesses with physical injury and death if they cooperated with law enforcement and retaliated with violence, including murder, against persons suspected of cooperating with government authorities.

The Racketeering Enterprise

9. The Reccless Tigers, including its leaders, members, and associates, constituted an “enterprise” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity, which engaged in, and the activities of which affected, interstate and foreign commerce. The Reccless Tigers constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

10. The purposes of the Reccless Tigers enterprise included the following:
- a. Enriching the members and associates of the enterprise through criminal activity, including the distribution and sale of illegal narcotics;
 - b. Enriching, preserving, expanding, and protecting the power, profits, reputation, and prestige of the enterprise through the use and threatened use of violence, including murder, assaults, assaults with dangerous weapons, arson, kidnapping, robbery, and extortion;
 - c. Promoting and enhancing the enterprise and the activities of its members through social events and social media;

- d. **Confronting and retaliating against rival gangs through the use of violence and threats of violence;**
- e. **Keeping victims and potential victims, including drug customers, in fear of the enterprise and its members and associates through violence, threats of violence, and intimidation;**
- f. **Hindering and obstructing efforts of law enforcement to identify, apprehend, and successfully prosecute offending gang members; and**
- g. **Obtaining, possessing, sharing, using, and carrying firearms and other weapons to preserve, protect, and further the purposes of the enterprise.**

Means and Methods of the Enterprise

- 11. **Among the means and methods by which the members and associates of the enterprise, including the defendants, agreed to conduct and participate in the conduct of the affairs of the enterprise, which included, but were not limited to, the following:**
 - a. **Members and associates of the enterprise committed and agreed to commit criminal acts for the benefit of the enterprise, including murder, assault, robbery, arson, kidnapping, extortion, and drug trafficking;**
 - b. **Members and associates of the enterprise obtained and distributed controlled substances;**
 - c. **Members and associates of the enterprise financed and operated marijuana grow operations in California for the purpose of distributing marijuana and THC-based products in the Eastern District of Virginia and elsewhere;**
 - d. **Members and associates of the enterprise used cellphones and messaging applications, including encrypted messaging applications, to communicate with members and associates of the enterprise and others to coordinate drug trafficking and other criminal activities;**

e. Members and associates of the enterprise promoted the enterprise and communicated with other members and associates of the enterprise through the use of social media websites by posting videos and photographs of illegal drugs, cash, firearms, gang jump-ins, gang social events, and fights with rival gangs;

f. Members and associates of the enterprise adopted hand gang signs and wore gang-themed tattoos and clothing to signify membership in the enterprise and to enhance the reputation and prestige of the enterprise;

g. Members and associates of the enterprise used intimidation, violence, and threats of violence to preserve, expand, and protect the enterprise and its criminal activities; and members and associates of the enterprise also used intimidation, violence, and threats of violence to promote and enhance their own prestige, reputation, and standing within the enterprise.

h. Members and associates of the enterprise used intimidation, violence, and threats of violence, including assaults, arson, and extortion, to collect drug debts;

i. Members and associates of the enterprise used intimidation, violence, and threats of violence against rival gangs, rival drug dealers, and others perceived to be a threat to the enterprise and its criminal activities;

j. Members and associates of the enterprise used intimidation, violence, and threats of violence to protect the enterprise from detection, apprehension, and prosecution by law enforcement; and members and associates of the enterprise used intimidation, violence, and threats of violence, including murder, assaults, arson, and extortion to dissuade potential witnesses from notifying or cooperating with authorities and to retaliate against witnesses believed to be cooperating with authorities.

k. Members and associates of the enterprise attempted to obstruct and obstructed law enforcement investigations of the enterprise by attempting to destroy and destroying evidence of their criminal activities;

l. Members and associates of the enterprise obtained, used, carried, and possessed firearms and other weapons to protect the enterprise and its members and associates and to further its unlawful activities;

m. Members and associates of the enterprise used banks and online money transfer services, couriers, and other means to collect drug money from customers, pay drug suppliers, and move money from the Eastern District of Virginia and elsewhere to other locations to acquire drugs and finance the gang's illegal activities;

n. members and associates of the enterprise leased apartments in the Eastern District of Virginia and elsewhere to store, distribute, and use narcotics and to collect money from drug sales; and members and associates of the enterprise leased Airbnb properties in Virginia, Washington, D.C., Maryland, and elsewhere to store, distribute, and use narcotics and to host social events and promote the enterprise.

The Racketeering Conspiracy

12. Beginning in or about 2011, the exact date being unknown to the Grand Jury, and continuing until on or about the date of this Fourth Superseding Indictment, in the Eastern District of Virginia and elsewhere, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), TONY MINH LE (a/k/a Sneaks, Sneaky, T, Tiger), SANG THANH HUYNH (a/k/a Cinco), YOUNG YOO (a/k/a YG), and SASCHA AMADEUS CARLISLE (a/k/a Sosa, Wolf), together with others, both known and unknown to the Grand Jury, being persons employed by and associated with the Reccless Tigers

enterprise, as previously described in this count, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1962(c), namely, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise, which was engaged in, and the activities of which affected, foreign and interstate commerce, through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Section 1961(1) and (5), which consisted of multiple:

- a. Acts involving murder, chargeable under Va. Code §§ 18.2-22, 18.2-26, and 18.2-32, and the common law of Virginia;
- b. Acts involving kidnapping, chargeable under Va. Code §§ 18.2-22, 18.2-26, 18.2-47, and the common law of Virginia.
- c. Acts involving arson, chargeable under Va. Code §§ 18.2-22, 18.2-26, and 18.2-77, and the common law of Virginia.
- d. Acts involving robbery, chargeable under Va. Code §§ 18.2-22, 18.2-26, and 18.2-58, and the common law of Virginia;
- e. Acts involving extortion, chargeable under Va. Code §§ 18.2-22, 18.2-26, and 18.2-59, and the common law of Virginia;
- f. Acts indictable under Title 18, United States Code, Section 894 (relating to extortionate credit transactions);
- g. Acts indictable under Title 18, United States Code, Sections 1503 (relating to obstruction of justice); 1512 (relating to tampering with a witness, victim, or an informant); and 1513 (relating to retaliation against a victim, witness, or an informant);

- h. Acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion);
- i. Acts indictable under Title 18, United States Code, Section 1952 (relating to racketeering);
- j. Acts indictable under Title 18, United States Code, Section 1956 (relating to the laundering of monetary instruments);
- k. Acts indictable under Title 31, United States Code, Section 5324 (relating to structuring transactions to avoid reporting requirement); and
- m. Offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance or listed chemical, as defined in section 102 of the Controlled Substances Act, in violation of Title 21, United States Code, Sections 841, 846, and 856;

13. It was further a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the enterprise's affairs.

Overt Acts

14. In furtherance of the conspiracy, and to effect the illegal object thereof, the defendants and their co-conspirators performed, participated in, and committed the following acts, among others, in the Eastern District of Virginia and elsewhere:

15. On or about September 8, 2012, in Kingsland, Georgia, while traveling between California and Virginia, TONY LE, JOSEPH LAMBORN, and two others possessed a .25 caliber handgun and small quantities of marijuana.

16. On or about September 3, 2012, on Victoria Road in Springfield, Virginia, in the Eastern District of Virginia, at the direction of TONY LE, members of the Reccless Tigers vandalized a residence. The attack was in retaliation against a drug supplier who was paid about \$11,000 by a gang member for marijuana but who instead delivered a bag of grass clippings to the gang member.

17. On or about September 15, 2012, at the direction of TONY LE, members of the Reccless Tigers again vandalized the residence on Victoria Road, in Springfield, Virginia.

18. On or about September 19, 2012, at the direction of TONY LE, members of the Reccless Tigers again vandalized the residence on Victoria Road, in Springfield, Virginia.

19. Beginning in or about 2013, in Centreville and elsewhere in northern Virginia, SASCHA CARLISLE dropped off marijuana and picked up money for TONY LE and other gang members; CARLISLE also drove to and from California and Virginia, delivering drugs and money for the Reccless Tigers.

20. On or about September 17, 2013, in Centreville, Virginia, JOSEPH LAMBORN and CC-2 assaulted an individual over a drug debt.

21. In or about October 2013, in Fairfax County, JOSEPH LAMBORN, CC-2, and another gang member used an apartment for receiving, storing, and distributing marijuana.

22. On or about October 18, 2013, in Fairfax County, JOSEPH LAMBORN, CC-2, and another gang member assaulted the lessee of an apartment because they suspected that he had stolen some of their marijuana.

23. On or about November 8, 2013, in Fairfax County, Virginia, YOUNG YOO possessed a firearm.

24. Beginning in or about 2014, in Fairfax County, Virginia, TONY LE distributed marijuana to CC-3 (a juvenile at the time), which CC-3 then distributed to his customers.

TONY LE also distributed cocaine to CC-3, which CC-3 then distributed to his customers.

25. On or about April 14, 2014, in Annandale, Virginia, CC-2 and another gang member threatened and assaulted an individual because of a drug debt owed to CC-2 and the gang.

26. On or about October 6, 2014, in Bristow, Virginia, JOSEPH LAMBORN, CC-1, and CC-2 assaulted with batons and robbed an individual in retaliation for a suspected drug rip-off.

27. Beginning in or about 2015, in Fairfax County, Virginia, PETER LE distributed marijuana to CC-4 (a juvenile at the time), which CC-4 then distributed to his customers.

28. Beginning in or about early 2015, in Fairfax County, Virginia, PETER LE distributed marijuana and other controlled substances to CC-5 (a juvenile at the time), which CC-5 then distributed to his customers.

29. Beginning in or about early 2015, in Fairfax County, Virginia, CC-5 distributed vape pens containing THC to CC-6, which CC-6 then sold to his customers.

30. Beginning in or about 2015, TONY LE distributed multi-pound quantities of marijuana to CC-7 for distribution by CC-7 to his customers in and around Springfield, Virginia.

31. Beginning in or about 2015, SASCHA CARLISLE delivered marijuana to CC-7's residence in Springfield, Virginia, for TONY LE.

32. Beginning in or about 2015, TONY LE stored approximately 30 to 50 pounds of marijuana at a time at CC-7's residence in Springfield, Virginia, which was then distributed at Tony Le's direction.

33. Beginning in or about 2015, TONY LE contacted CC-7 by text message, directing CC-7 to deliver marijuana and pick up money for TONY LE.

34. Beginning in or about 2015, CC-7 delivered marijuana to CC-1, CC-8, and others for TONY LE.

35. On or about March 17, 2015, in Lorton, Virginia, PETER LE, CC-4, CC-9, CC-10, CC-11, and CC-12, yelling "Reccless Tigers" assaulted a victim with metal batons.

36. On or about March 17, 2015, in Centreville, Virginia, YOUNG YOO, CC-1, and CC-13 assaulted an individual at a restaurant.

37. On or about April 10, 2015, in Fairfax County, Virginia, PETER LE, CC-4, and two other co-conspirators possessed marijuana and paraphernalia used to distribute marijuana, including a digital scale and several hundred small jeweler's bags.

38. On or about April 29, 2015, in Arlington County, Virginia, PETER LE and CC-4 possessed with the intent to distribute marijuana.

39. Beginning in or about the fall of 2015, in Fairfax County, Virginia, PETER LE distributed marijuana to CC-14, which CC-14 both used and resold.

40. In or about late 2015, PETER LE told CC-5 that he wanted to meet CC-6 because CC-6 was buying a large number of vape pens from CC-5.

41. Beginning in or about late 2015, in Lorton, Virginia, PETER LE distributed marijuana, vape pens, and other controlled substances to CC-6, which CC-6 then sold to his customers.

42. On or about January 8, 2016, in Fairfax County, Virginia, PETER LE, CC-4, CC-9, and other gang members assaulted an individual, believing that the person was preparing to rob PETER LE of marijuana.

43. On or about March 1, 2016, in Fairfax County, Virginia, CC-14 possessed with the intent to distribute marijuana, which CC-14 had obtained from PETER LE.

44. On or about March 23, 2016, in Fairfax County, Virginia, CC-5 and CC-15, possessed several plastic zip-lock baggies of marijuana they had received from PETER LE.

45. On or about April 18, 2016, in Fairfax County, Virginia, PETER LE distributed approximately one ounce of marijuana in exchange for \$250.

46. In or about April 2016, YOUNG YOO rented a home in Herndon, Virginia, through Airbnb, for a Reccless Tigers house party that began on April 22, 2016.

47. On or about April 22, and continuing until April 24, 2016, TONY LE and the Reccless Tigers hosted a house party at an Airbnb rental home in Herndon, Virginia; drugs and alcohol were made available to gang members and their guests at the party.

48. On or about April 22-24, 2016, a number of the Asian Boyz from California attended the house party in Herndon.

49. On or about April 24, 2016, in Herndon, Virginia, a gang member got into a fight with a guest at the house party.

50. On or about April 24, 2016, in Herndon, Virginia, several other gang members joined the fight and began punching the guest; during the fight, a gang member stabbed the guest, who then left the party. He died several hours later at his home as a result of the stabbing.

51. On or about May 8, 2016, at a restaurant in Annandale, Virginia, a member of the Reccless Tigers assaulted an individual whom the gang believed had cooperated with law enforcement.

52. On or about June 16, 2016, in Fairfax County, Virginia, PETER LE, CC-2, CC-4, CC-9, and other gang members broke into a music studio, assaulting its owner and robbing him of electronic equipment and other property.

53. On or about July 14, 2016, in Dumfries, Virginia, TONY LE and two other gang members threw Molotov cocktails at a residence, one of which broke a window and landed inside the home. The attack was in retaliation against a customer who had failed to pay for marijuana distributed to him by a gang member.

54. On or about August 20, 2016, in Fairfax County, Virginia, PETER LE possessed with the intent to distribute approximately 13 ounces of marijuana packaged in eight individual plastic sandwich bags along with \$897 in cash.

55. On or about August 24, 2016, members of the Reccless Tigers set fire to a vehicle at a residence on Victoria Road, in Springfield, Virginia.

56. In or about September 2016, PETER LE distributed marijuana to CC-14, which CC-14 then distributed to customers at or near VCU in Richmond, Virginia.

57. On or about September 28, 2016, CC-6 possessed with the intent to distribute marijuana he had obtained from PETER LE.

58. On or about October 7, 2016, in Fairfax County, Virginia, YOUNG YOO possessed marijuana and a gun.

59. On or about October 28, 2016, at the direction of TONY LE, members of the Reccless Tigers threw Molotov Cocktails at the residence on Victoria Road, in Springfield, Virginia.

60. On or about November 1, 2016, TONY LE directed members of the Reccless Tigers to fire-bomb a residence in Stafford County, Virginia, belonging to an individual believed

to have had a relationship with TONY LE's girlfriend; the gang members threw Molotov cocktails at the residence, which was occupied, setting it on fire.

61. On or about November 3, 2016, in Annandale, Virginia, TONY LE directed PETER LE and other gang members to fire-bomb the residence of the individual who had been attacked at a restaurant on May 8, 2016, and whom the gang believed had cooperated with law enforcement; they threw Molotov cocktails at the residence, which was occupied at the time, setting it on fire.

62. On or about November 17, 2016, in Fairfax County, Virginia, YOUNG YOO possessed with intent to distribute marijuana and a gun.

63. On or about November 24, 2016, SANG HUYNH posted photographs on social media in which SANG HUYNH possessed cash and two guns.

64. On or about December 1, 2016, at the direction of TONY LE, several members of the Reccless Tigers vandalized and attempted to set fire to a vehicle parked at the residence on Victoria Road in Springfield, Virginia.

65. On or about December 18, 2016, TONY LE, SANG HUYNH, CC-1, and other members of the Reccless Tigers "jumped-in" a new gang member.

66. Beginning in or about 2017, in Fairfax County, Virginia, PETER LE distributed marijuana and vape pens containing THC to CC-3, which CC-3 then distributed to his customers.

67. In or about January 2017, at an apartment in Santa Ana, California, TONY LE met with CC-16 to discuss investing in a marijuana grow operation with CC-16, after which TONY LE gave CC-16 \$80,000 in cash in partial payment for a share of the marijuana harvested from CC-16's farm near Hayfork, California.

68. In or about early 2017, TONY LE received multi-ounce shipments of cocaine for distribution by TONY LE and other gang members.

69. On or about February 10, 2017, at the direction of TONY LE, several members of the Reccless Tigers vandalized the residence on Victoria Road in Springfield, Virginia.

70. In or about March 2017, PETER LE used two apartments in Lorton, Virginia, for the purpose of receiving, storing, and distributing marijuana and other controlled substances; one of the apartments was leased by CC-17, where PETER LE lived.

71. In or about March 2017, and continuing until in or about November 2017, in Lorton, Virginia, PETER LE kept a Glock handgun at the apartment where he lived with CC-17.

72. On or about March 6, 2017, SANG HUYNH posted a video on social media in which SANG HUYNH and TONY LE possessed a wad of cash and an unidentified person possessed a gun.

73. On or about March 12, 2017, YOUNG YOO shared a video on social media showing YOUNG YOO in possession of six firearms at his residence in Centreville, Virginia, including an assault rifle, a shotgun, and several handguns.

74. On or about March 15, 2017, YOUNG YOO posted a photograph on social media of seven handguns in YOUNG YOO's bathroom in Centreville, Virginia, including three revolvers and four semi-automatic pistols.

75. On or about March 27, 2017, in Lorton, Virginia, PETER LE vandalized a residence of one of his drug customers because of a drug debt and because PETER LE believed that the customer had cooperated with law enforcement.

76. On or about March 29, 2017, in Fairfax County, Virginia, PETER LE directed other gang members to “jump-in” a new member of Club Tiger; the new member was a juvenile at the time.

77. On or about April 16, 2017, in Annandale, Virginia, during a concert at the ARA night club, members of the Reccless Tigers, including TONY LE, PETER LE, SANG HUYNH, JOSEPH LAMBORN, and YOUNG YOO, fought with rival gang members; during the fight, shots were fired.

78. On or about April 17, 2017, in Annandale, Virginia, at The Block, members of the Reccless Tigers, including TONY LE, PETER LE, and SANG HUYNH, fought with rival gang members; one of the Reccless Tigers involved in the fight brandished and discharged a semi-automatic hand-gun during the fight.

79. On or about May 6, 2017, SANG HUYNH posted a video recording on social media in which SANG HUYNH stated he was in Detroit; in the video, SANG HUYNH possessed a gun and an unidentified individual held a bag containing what appears to be drugs.

80. On or about May 24, 2017, SANG HUYNH posted a video recording on social media in which SANG HUYNH is seen with another gang member and in possession of a handgun.

81. In or about May 2017, in Richmond, Virginia, TONY LE, CC-1, and other gang members threatened, assaulted, and abducted a victim, believing that the victim’s boyfriend was planning on robbing the Reccless Tigers of marijuana and money.

82. On or about May 22, 2017, at the Eden Center in Falls Church, Virginia, SANG HUYNH and another person assaulted an individual.

83. In or about the summer of 2017, in Las Vegas, Nevada, TONY LE, JOSEPH LAMBORN, SANG HUYNH, SASCHA CARLISLE, and other gang members “jumped-in” PETER LE to Tiger Side, the off-shoot of the Reccless Tigers closely affiliated to the Asian Boyz in Southern California.

84. Beginning in or about the summer of 2017, in Fairfax County, PETER LE began distributing marijuana to CC-18 in ounce, multi-ounce, and quarter-pound quantities.

85. In or about June 2017, in Fredericksburg, Virginia, TONY LE, PETER LE, CC-16, and others met to discuss the grow operation in California, at which time TONY LE gave CC-16 \$20,000 in cash and promised to send CC-16 workers for the farm.

86. In or about June 2017, TONY LE sent drivers, including SASCHA CARLISLE, to the marijuana farm near Hayfork, California, to pick up the first harvest following TONY LE’s investment in the grow operation.

87. In or about June 2017, in Miami, Florida, TONY LE and other gang members “jumped-in” CC-3 to Tiger Side.

88. On or about June 8, 2017, SANG HUYNH posted a video recording on social media in which SANG HUYNH is seen in possession of a handgun.

89. On or about June 22, 2017, SANG HUYNH posted a video recording on social media in which SANG HUYNH is seen in possession of a handgun.

90. On or about July 18, 2017, TONY LE and other gang members “jumped-in” CC-19 to Tiger Side, a video recording of which was posted on social media by SANG HUYNH.

91. In or about July 2017, TONY LE and PETER LE sent workers to the farm in California, where they would help cut, trim, and process marijuana for shipment to Virginia and elsewhere.

92. On or about August 28, 2017, in Fairfax County, Virginia, outside of a convenience store, PETER LE, CC-2, and another gang member stabbed and robbed an individual because the victim owed them money for drugs and because they believed that the victim had cooperated with law enforcement.

93. Beginning in or about August 2017, and continuing until mid-2018, CC-7 traveled from Virginia to California on multiple occasions to work off his drug debt to TONY LE.

94. Beginning in or about August 2017, and continuing until mid-2018, in Garden Grove and other locations in southern California, TONY LE used CC-7 to pick up and deliver marijuana.

95. Beginning in or about August 2017, and continuing until mid-2018, at locations in and around Los Angeles, California, CC-7 met TONY LE, SASCHA CARLISLE, and other gang members to pick up and deliver duffel bags containing 20-30 pounds of marijuana.

96. Beginning in or about August 2017, and continuing until mid-2018, TONY LE directed CC-7 to ship boxes containing from 15 to 30 pounds of marijuana to addresses in Northern Virginia.

97. On or about September 9, 2017, SANG HUYNH posted a video recording on social media that showed SANG HUYNH using drugs and possessing a handgun.

98. Beginning on or about September 16, 2017, in Orange, California, SANG HUYNH leased a storage facility at One Stop Storage.

99. On or about September 18, 2017, CC-7 shared a video and photographs on social media with YOUNG YOO in which CC-7 showed YOUNG YOO guns that were for sale, including an assault-style rifle.

100. On or about September 23, 2017, YOUNG YOO posted a picture on social media that showed YOUNG YOO in possession of a firearm.

101. In or about October 2017, in Springfield, Virginia, PETER LE, CC-20, CC-5, CC-21, and other gang members slapped a woman whom they believed had disrespected the gang.

102. On or about October 6, 2017, in Fairfax County, Virginia, PETER LE smashed the windshield of a car belonging to one of his drug customers because of a drug debt.

103. On or about October 9, 2017, SANG HUYNH posted a video recording on social media in which SANG HUYNH is seen in possession of a handgun.

104. On or about October 17, 2017, in Fairfax County, Virginia, CC-18 possessed with intent to distribute marijuana he had obtained from PETER LE.

105. In or about November 2017, and continuing until September 2018, in Merrifield, Virginia, CC-17 leased an apartment in the Mosaic District, which PETER LE used to receive, store, and distribute marijuana and other controlled substances.

106. In or about November 2017, and continuing until September 2018, in Merrifield, Virginia, PETER LE kept a handgun at the apartment he shared with CC-17.

107. On or about November 24, 2017, SANG HUYNH posted video recordings on social media in which he acknowledged that he was a member of the Reccless Tigers and during which he brandished a handgun.

108. On or about December 18, 2017, in Washington, D.C., SANG HUYNH, CC-4, CC-3, and another gang member assaulted a rival gang member, stabbing him at least four times.

109. On or about December 27, 2017, in Springfield, Virginia, outside the Way of Ink tattoo parlor, several gang members, including SANG HUYNH and YOUNG YOO, assaulted PETER LE.

110. In or about 2018, on a regular basis from his Lorton and Mosaic apartments, PETER LE distributed thousands of vape pens containing THC with Club Tiger logos.

111. In or about 2018, on a weekly basis, PETER LE directed CC-20 to deposit over \$100,000 in cash drug proceeds into dozens of different Wells Fargo bank accounts in amounts less than \$10,000 at several Wells Fargo branches in Northern Virginia; PETER LE provided CC-20 with account information using Signal, an encrypted message application.

112. In or about early 2018, while in California, TONY LE directed CC-7 to use encrypted message applications, such as Signal, which CC-7 then used to communicate with TONY LE, PETER LE, and other gang members.

113. In or about 2018, in Garden Grove and elsewhere in southern California, TONY LE regularly carried a handgun, usually a revolver.

114. In or about 2018, in Hayfork, California, TONY LE acquired multiple sources of marijuana among marijuana growers in the area.

115. In or about 2018, in California, TONY LE arranged for the shipment of multi-pound parcels of marijuana to Virginia.

116. In or about 2018, TONY LE acquired thousands of vape pens containing THC from sources in California for shipment to Virginia.

117. On or about January 7, 2018, SANG HUYNH posted a video recording on social media in which SANG HUYNH is seen in possession of a handgun.

118. On or about January 25, 2018, in Fairfax County, Virginia, CC-5 possessed with the intent to distribute controlled substances he had recently obtained from PETER LE, including marijuana, THC Oil, THC wax, THC edibles, Adderall, and amphetamines.

119. In or about February 2018, TONY LE sent SASCHA CARLISLE, ANTHONY NGUYEN THANH LE, CC-19, CC-8, and others to the farm in Hayfork, California, to help with the marijuana grow operation.

120. On or about February 8, 2018, in Fairfax County, CC-6 possessed with the intent to distribute marijuana, including marijuana packaged in half-ounce quantities ready for sale and vape pens containing THC, all of which he had recently obtained from PETER LE.

121. On or about February 11, 2018, in Nelson County, Virginia, CC-6 possessed with the intent to distribute marijuana he had recently obtained from PETER LE.

122. In or about March 2018, SASCHA CARLISLE drove a white Mercedes from California to Northern Virginia.

123. In or about April 2018, in Prince George's County, Maryland, PETER LE purchased several handguns from an individual for \$1,400; at the same time, PETER LE paid this individual an additional \$2,000 for ten handguns to be delivered in the future.

124. On or about May 22, 2018, in Fairfax County, Virginia, PETER LE distributed over \$4,000 worth of marijuana to one of his customers.

125. On or about May 22, 2018, in Fairfax County, Virginia, PETER LE possessed over \$4000 in drug proceeds, several cell phones, and a vile of THC oil with a Club Tiger label, at which time PETER LE and CC-22 were arrested by the police.

126. On or about May 22, 2018, in Fairfax County, Virginia, PETER LE coached CC-22 on what to tell the police after they were arrested so that PETER LE would not be charged.

127. In or about early June 2018, CC-4 delivered approximately five ounces of cocaine to CC-20 for PETER LE.

128. On or about June 18, 2018, in Annandale, Virginia, PETER LE, Anthony Nguyen Thanh Le, and CC-20 distributed approximately five ounces of cocaine and three pounds of marijuana to a person working for law enforcement. During this meeting, PETER LE was paid \$10,000 in cash to repay a drug debt for cocaine and marijuana previously distributed by PETER LE to this person.

129. In or about the summer of 2018, PETER LE directed CC-6 to register several cars in CC-6's name for use by PETER LE and other gang members; CC-6 owed PETER LE money, and he registered the cars as directed, including a Mercedes Benz sedan.

130. In or about the summer of 2018, YOUNG YOO tried to find Brandon White because White owed YOO money for marijuana YOO had distributed to White.

131. On or about August 5, 2018, SANG HUYNH leased an apartment in Dunn Loring, Virginia, through a third party, which SANG HUYNH used to receive, store, and distribute marijuana.

132. On or about August 8, 2018, in Fairfax County, Virginia, CC-24 contacted YOUNG YOO by telephone, telling YOO that he was with Brandon White.

133. On or about August 8, 2018, in Fairfax County, Virginia, CC-24 asked YOUNG YOO whether he should assault Brandon White because of White's drug debt to YOO.

134. On or about August 8, 2018, in Fairfax County, Virginia, YOUNG YOO directed CC-24 to assault Brandon White.

135. On or about August 8, 2018, at or near a residence on Rosemoor Lane in Fairfax County, Virginia, CC-24 assaulted Brandon White, which resulted in White being taken to the hospital with serious injuries and CC-24 being arrested by Fairfax County police.

136. On or about August 16, 2018, in Lorton, Virginia, PETER LE directed Club Tiger members to fire-bomb another member's residence because of a drug debt.

137. In or about September 2018, and continuing until in or about February 2019, in Dunn Loring, Virginia, PETER LE used an apartment leased by CC-17 for receiving, storing, and distributing marijuana and other controlled substances.

138. In or about September 2018, and continuing until in or about February 2019, in Dunn Loring, Virginia, PETER LE kept a handgun at the apartment he shared with CC-17.

139. In or about early September 2018, several persons contacted Brandon White on behalf of YOUNG YOO to see if White would accept money if White would agree not to testify or pursue charges against CC-24. One such person told White that White's drug debt would go away and White would also receive \$5,000 if he agreed not to testify against CC-24.

140. In or about the fall of 2018, PETER LE distributed marijuana and THC products to CC-14 and CC-20, for distribution to their customers in Richmond, Virginia.

141. In or about the fall of 2018, in Richmond, Virginia, CC-14 and CC-20 distributed marijuana and THC products to students at VCU.

142. In or about the fall of 2018, PETER LE paid SASCHA CARLISLE about \$7,000 per month to pick up and deliver drugs and money.

143. On or about September 15, 2018, in an Instagram message, JOSEPH LAMBORN acknowledged that he owed TONY LE \$75,000 and told TONY LE that he will make it right.

144. On or about September 19, 2018, in Fairfax County, a person again approached White and offered him \$10,000 to settle the case against CC-24.

145. On or about September 25, 2018, in Fairfax County, a person told Brandon White that YOUNG YOO would pay him \$8,000 for his injuries and White's debt to YOUNG YOO

would go away if he refused to testify against CC-24.

146. On or about November 3, 2018, in an Instagram message, JOSEPH LAMBORN told TONY LE that he is going to begin paying off his debt to TONY LE and that he is grateful that TONY LE will not charge him interest on his debt; on the same date, JOSEPH LAMBORN posted a video of CC-24 with a gun, labeling it “free [CC-24].”

147. On or about November 6, 2018, in Fairfax County, CC-25 told Brandon White that, if White showed up in court in the “Tigers” case, White might end up dead.

148. On or about November 6, 2018, in Fairfax County, CC-26 spoke to Brandon White by telephone, informing White that, if his “boy” (CC-24) was convicted, he was coming after White and White’s grandmother, baby, and wife; CC-26 offered White money not to testify against CC-24.

149. On or about November 10, 2018, in Falls Church, Virginia, two unidentified members or associates of the Reccless Tigers knocked on the front door of White’s grandmother’s house, where White frequently stayed; when White’s grandmother looked out the window at the two men, they made gestures indicating that White was going to be killed.

150. On or about November 19, 2018, CC-24 appeared in Fairfax County court for a preliminary hearing on the charges against him for assaulting Brandon White; at that hearing, White testified that CC-24 assaulted him on August 8, 2018.

151. In or about late 2018, following Brandon White’s testimony against CC-24, in Fairfax County, Virginia, and elsewhere, YOUNG YOO attempted to locate Brandon White because White was a “snitch.”

152. Sometime prior to December 20, 2018, from the Fairfax County jail, CC-24 sent a friend a copy of a Fairfax County police report regarding CC-24’s assault on Brandon White; the

report summarized Brandon White's statements to the police and to the FBI about the assault and White's prior association with the Reccless Tigers, including his drug debt to YOUNG YOO.

153. Sometime prior to December 20, 2018, from the Fairfax County jail, CC-24 directed his friend to take a picture of the police report and send the picture to members of the Reccless Tigers to put on Instagram and Snapchat so that they would know that White was a "snitch" and should be "checked."

154. In or about January 2019, PETER LE told CC-6 to deliver money CC-6 owed PETER LE to SASCHA CARLISLE at an apartment in Forestville, Maryland, which CC-6 did.

155. In or about late January 2019, PETER LE told CC-27 that CC-27 and CC-21 could clear their drug debts to PETER LE if they could deliver Brandon White to PETER LE.

156. In or about late January 2019, a few days before the abduction of Brandon White, PETER LE contacted CC-6 using Signal, a secure mobile phone application for voice and text communication, informing CC-6 that some of his "boys" would be picking up CC-6's Mercedes Benz sedan.

157. On or about January 29, 2019, in Fairfax County, CC-27 and CC-21 discussed a plan to get Brandon White to meet them. They decided that they would tell White that they wanted to purchase Percocet if White could connect them to his source. Instead of taking White to meet White's Percocet source, CC-27 and CC-21 planned to take White to another location, where PETER LE and other members of the Reccless Tigers would be waiting for them.

158. On or about January 29, 2019, in Fairfax County, CC-21 attempted to contact Brandon White to find out if White would take CC-21 and CC-27 to purchase Percocet from White's source, but White did not respond.

159. On or about January 31, 2019, CC-21 contacted Brandon White about purchasing Percocet through White's source; White told CC-21 that his Percocet source was in Washington D.C., and White agreed to meet CC-21 later that day.

160. On or about January 31, 2019, in Fairfax County, CC-27 and CC-21 picked up a Mercedes Benz sedan from CC-6.

161. On or about January 31, 2019, CC-27 and CC-21 drove the Mercedes Benz sedan from CC-6's residence in Fairfax County to Falls Church, Virginia, to meet Brandon White.

162. On or about January 31, 2019, in and around the Woodbridge area of Fairfax County, CC-19 collected drug proceeds for PETER LE, which CC-19 was planning to deliver to PETER LE later that day.

163. On or about January 31, 2019, PETER LE told JOSEPH LAMBORN, YOUNG YOO, SASCHA CARLISLE, and CC-19 to meet him at his Dunn Loring apartment.

164. On or about January 31, 2019, SASCHA CARLISLE picked up CC-19 in Woodbridge, Virginia, and they traveled together in CARLISLE's blue Subaru sedan to PETER LE's apartment in Dunn Loring, Virginia.

165. On or about January 31, 2019, JOSEPH LAMBORN and YOUNG YOO traveled from SANG THANH HUYNH's Airbnb rental home in Ft. Washington, Maryland, to PETER LE's apartment in Dunn Loring, Virginia.

166. On or about January 31, 2019, in Dunn Loring, Virginia, PETER LE, JOSEPH LAMBORN, and YOUNG YOO discussed the plan to abduct Brandon White.

167. On or about January 31, 2019, at about 10:46 p.m., CC-27 and CC-21 picked up Brandon White near his grandmother's residence in Falls Church, Virginia.

168. On or about January 31, 2019, CC-27, CC-21, and Brandon White, drove in the Mercedes Benz sedan toward Rt. 50/Arlington Blvd. in Falls Church, Virginia, when the Mercedes Benz broke down.

169. On or about January 31, 2019, at about 10:53 p.m., CC-27 pulled into an Exxon station on Arlington Blvd. adjacent to the Loehmann's Plaza shopping center to see if they could get the Mercedes Benz running.

170. On or about January 31, 2019, CC-27 contacted PETER LE on Signal and informed him that CC-27 was stranded at Loehmann's Plaza with CC-21 and Brandon White.

171. On or about January 31, 2019, PETER LE told CC-27 to remain there and someone would be there soon to pick them up.

172. On or about January 31, 2019, at the Loehmann's Plaza shopping center in Falls Church, Virginia, CC-27, CC-21, and Brandon White spent about 20 minutes at the Exxon station trying to get the Mercedes Benz sedan running, but they failed. They then pushed the car to a parking spot and went into a McDonald's restaurant near the Exxon station to wait.

173. On or about January 31, 2019, PETER LE, JOSEPH LAMBORN, armed with a handgun, and SASCHA CARLISLE left PETER LE's Dunn Loring apartment in the blue Subaru sedan and drove to Loehmann's Plaza in Falls Church; SASCHA CARLISLE was driving the car.

174. On or about January 31, 2019, YOUNG YOO, armed with a handgun, and CC-19 drove from PETER LE's Dunn Loring apartment in a white SUV to Loehmann's Plaza in Falls Church; CC-19 was driving the SUV.

175. On or about January 31, 2019, at the Loehmann's Plaza shopping center in Falls Church, Virginia, CC-27, CC-21, and Brandon White spent about 20 minutes at the McDonald's restaurant waiting for a ride.

176. On or about January 31, 2019, PETER LE sent CC-27 a message that he was on his way to Loehmann's Plaza, and, at about 11:37 p.m., CC-27, CC-21, and Brandon White left the McDonald's restaurant and began walking across the parking lot toward the Giant grocery store.

177. On or about January 31, 2019, in Falls Church, PETER LE, JOSEPH LAMBORN, and SASCHA CARLISLE, in the blue Subaru sedan, and YOUNG YOO and CC-19, in the white SUV, arrived at Loehmann's Plaza and parked parallel to each other a short distance from the Giant grocery store.

178. On or about January 31, 2019, at Loehmann's Plaza, CC-27 walked over to where the two vehicles had parked, and he motioned for CC-21 and Brandon White, who were standing in front of the Giant grocery store, to walk over as well, which they did.

179. On or about January 31, 2019, at Loehmann's Plaza, when Brandon White got close to the two vehicles, PETER LE and JOSEPH LAMBORN got out of the blue Subaru, grabbed Brandon White, and forced him into the back seat of the blue Subaru.

180. On or about January 31, 2019, at Loehmann's Plaza, after Brandon White was shoved into the blue Subaru, CC-27 got into the white SUV with YOUNG YOO and CC-19.

181. On or about January 31, 2019, at about 11:56 p.m., PETER LE, JOSEPH LAMBORN, and SASCHA CARLISLE, in the blue Subaru sedan with Brandon White, and YOUNG YOO, CC-19, and CC-27, in the white SUV, left Loehmann's Plaza and drove south to Richmond, Virginia, on I-95 at a high rate of speed.

182. On or about February 1, 2019, during the drive to Richmond, YOUNG YOO directed CC-27 to turn off his cell phone. Later, during the drive, when the two vehicles became separated, YOUNG YOO told CC-27 to turn on his cell phone to reconnect with the blue Subaru, which they did.

183. On or about February 1, 2019, at about 1:25 a.m., PETER LE, JOSEPH LAMBORN, and SASCHA CARLISLE, in the blue Subaru sedan with Brandon White, and YOUNG YOO, CC-19, and CC-27, in the white SUV, arrived in Richmond, Virginia, and they parked both vehicles along a street in the Windsor Farms area, a residential neighborhood on the west side of the city not far from the James River and Kanawha Canal.

184. On or about February 1, 2019, after both vehicles parked, PETER LE and JOSEPH LAMBORN forced Brandon White out of the blue Subaru.

185. On or about February 1, 2019, after both vehicles parked, YOUNG YOO got out of the white SUV and walked over to the blue Subaru.

186. On or about February 1, 2019, PETER LE, JOSEPH LAMBORN, and YOUNG YOO forced Brandon White at gun point to walk into a wooded area a short distance from where the two vehicles were parked.

187. On or about February 1, 2019, in Richmond, Virginia, PETER LE, JOSEPH LAMBORN, and YOUNG YOO stabbed Brandon White several times and shot him at least twice in the back, killing him.

188. On or about February 1, 2019, after killing Brandon White, PETER LE, JOSEPH LAMBORN, and YOUNG YOO returned to the two vehicles, leaving Brandon White's body in the wooded area where they had killed him.

189. On or about February 1, 2019, after killing Brandon White, YOUNG YOO put a semi-automatic handgun and a jacket into a white trash bag after he got into the white SUV.

190. On or about February 1, 2019, shortly after 1:30 a.m., PETER LE, JOSEPH LAMBORN, and SASCHA CARLISLE, driving the blue Subaru, and YOUNG YOO, CC-27, and CC-19, driving the white SUV, left the Windsor Farms area and headed back to Northern Virginia.

191. On or about February 1, 2019, at about 3:00 a.m., YOUNG YOO and CC-19 dropped off CC-27 near an apartment in Springfield, Virginia, after which they drove to SANG HUYNH's Airbnb rental house in Ft. Washington, Maryland.

192. On or about February 1, 2019, at about 3:30 a.m., SASCHA CARLISLE, driving the blue Subaru, dropped off PETER LE at his Dunn Loring apartment.

193. On or about February 1, 2019, SASCHA CARLISLE and JOSEPH LAMBORN also went to SANG HUYNH's Airbnb rental house following the killing of Brandon White.

194. On or about February 1, 2019, in Ft. Washington, Maryland, YOUNG YOO stored the plastic bag with the handgun and jacket in his room at SANG HUYNH's Airbnb rental house.

195. On or about February 10, 2019, JOSEPH LAMBORN posted a video to his Snapchat account in which LAMBORN is seen brandishing a semi-automatic pistol, and the text accompanying the video stated, "Gift from the homie.. he said I earned it...."

196. On or about February 15, 2019, SASCHA CARLISLE delivered money to CC-28 with instructions to deliver the money to PETER LE; CC-28 tried to deliver the money to PETER LE at his Dunn Loring apartment, but PETER LE was arrested before he could make the delivery.

197. On or about February 16, 2019, in Dunn Loring, Virginia, CC-17 and CC-29 removed PETER LE's handgun and several pounds of marijuana from his apartment.

198. On or about February 17, 2019, in the City of Fairfax, Virginia, SASCHA CARLISLE picked up money from CC-6 that CC-6 owed PETER LE.

199. On or about February 17, 2019, CC-3 rented an Airbnb house in Raleigh, North Carolina for YOUNG YOO and SASCHA CARLISLE.

200. On or about February 19, 2019, JOSEPH LAMBORN contacted CC-2 for help in disposing of Brandon White's body.

201. On or about February 24 and 25, JOSEPH LAMBORN and CC-2 traveled together by bus from Dallas, Texas, to Petersburg, Virginia, to dispose of Brandon White's body.

202. On or about February 24, 2019, CC-4 told CC-3 to rent a room at the Extended stay America in Richmond, Virginia, which he did.

203. On or about February 25, 2019, CC-4, CC-3, and another gang member, CC-10, met at the Extended Stay America hotel in Richmond, Virginia.

204. On or about February 25, 2019, CC-4 and CC-10 drove to Petersburg, Virginia, to pick up JOSEPH LAMBORN and CC-2 at the bus station in Petersburg, Virginia.

205. On or about February 25, 2019, JOSEPH LAMBORN, CC-2, CC-4, and CC-10 drove to the Extended Stay America hotel in Richmond, Virginia.

206. On or about February 25, 2019, JOSEPH LAMBORN, CC-2, CC-4, and CC-10 drove to where PETER LE, JOSEPH LAMBORN, and YOUNG YOO had killed Brandon White, and JOSEPH LAMBORN, CC-2, and CC-4 searched the woods where Brandon White was killed to locate his body.

207. On or about February 25, 2019, after locating Brandon White's body, JOSEPH LAMBORN, CC-2, and CC-4 wrapped the body in a tarp and attempted to carry the body to the river. After moving White's body a short distance, they abandoned that plan and decided to leave White's body, still wrapped in the tarp, under some bushes.

208. On or about February 26, 2019, JOSEPH LAMBORN and CC-2 traveled from Richmond, Virginia, to Raleigh, North Carolina, where they joined YOUNG YOO, SASCHA CARLISLE, and CC-30, a member of the Asian Boyz.

209. On or about February 26, 2019, JOSEPH LAMBORN posted a number of videos to his Snapchat account, including a video of YOUNG YOO and another of LAMBORN flashing gang signs in a bathroom mirror.

210. In or about February 2019, TONY LE met with CC-16 to discuss the grow operation near Hayfork, California, at which time TONY LE told CC-16 that he was expecting greater yields of marijuana from the farm.

211. In or about February 2019, TONY LE sent CC-8 to the farm in California to help manage the grow operation with CC-16.

212. In or about early March 2019, SASCHA CARLISLE drove JOSEPH LAMBORN and CC-2 from North Carolina to Tennessee, where LAMBORN and CC-2 boarded a bus to Dallas, Texas.

213. On or about April 15, 2019, in Fairfax County, Virginia, SASCHA CARLISLE, while driving the blue Subaru sedan, possessed \$23,500 in cash and numerous cell phones; on one of his phones SASCHA CARLISLE kept a ledger of money he had collected for drugs distributed by the gang.

214. In or about May 2019, YOUNG YOO fled from Virginia to California.

215. In or about June 2019, TONY LE sent YOUNG YOO to the marijuana grow operation near Hayfork, California.

216. In or about June 2019, near Hayfork, California, YOUNG YOO arrived at the gang's marijuana grow operation with CC-8, where he stayed until the farm was raided by the FBI on July 24, 2019.

217. On or about July 16, 2019, TONY LE met with CC-16 at the marijuana farm near Hayfork, California, at which time TONY LE offered CC-16 \$200,000 to purchase land from CC-16 on which to grow marijuana.

218. On or about July 24, 2019, near Hayfork, California, YOUNG YOO fled from the farm shortly before the FBI executed a search warrant at the property.

219. On or about September 18, 2019, in Orange, California, SANG HUYNH possessed an Uzi semi-automatic pistol; ammunition for the Uzi; a money counter; drugs, including cocaine and Xanax; cell phones; Reccless Tigers key chains, t-shirt, and business cards; and drug ledgers.

220. Paragraphs 259 through 315 of this indictment are re-alleged and incorporated as if fully set forth herein.

All in violation of Title 18, Section 1962(d)

Count 2

Assault with a Dangerous Weapon in Aid of Racketeering Activity

THE GRAND JURY FURTHER CHARGES THAT:

221. Paragraphs 1 through 11 of Count 1 of this indictment are re-alleged and incorporated as if fully set forth herein.

222. At all times relevant to this indictment, the Reccless Tigers, including its leaders, members, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

223. At all times relevant to this indictment, the Reccless Tigers, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving murder, kidnapping, arson, robbery, and extortion in violation of Virginia law; acts indictable under Title 18, United States Code, Sections 894, 1503, 1512, 1513, 1951, 1952, and 1956, and Title 31, United States Code, 5324; and offenses involving the distribution of controlled substances in violation of the laws of the United States, including Title 21, United States Code, Sections 841, 846, and 856.

224. On or about December 27, 2017, in Springfield, Virginia, in the Eastern District of Virginia, the defendants, SANG THANH HUYNH (a/k/a Cinco) and YOUNG YOO (a/k/a YG), for the purpose of gaining entrance to and maintaining and increasing position in the Reccless Tigers, an Enterprise engaged in racketeering activity, did unlawfully and knowingly assault PETER LE with a dangerous weapon, in violation of Va. Code Ann. Va. Code Ann. §§ 18.2-18 and 18.2-57.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2

Count 3

Murder in Aid of Racketeering Activity

THE GRAND JURY FURTHER CHARGES THAT:

225. Paragraphs 1 through 11 of Count 1 and paragraphs 222 and 223 of Count 2 of this indictment are re-alleged and incorporated as if fully set forth herein.

226. On or about February 1, 2019, in Richmond, Virginia, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), and YOUNG YOO (a/k/a YG), for the purpose of gaining entrance to and maintaining and increasing position in the Reccless Tigers, an Enterprise engaged in racketeering activity, did unlawfully and knowingly murder Brandon White, in violation of Va. Code Ann. §§ 18.2-18 and 18.2-32.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2

Count 4

Conspiracy to Kidnap

THE GRAND JURY FURTHER CHARGES THAT:

227. On or about January 31, 2019, and continuing thereafter on February 1, 2019, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), YOUNG YOO (a/k/a YG), and SASCHA AMADEUS CARLISLE (a/k/a Sosa, Wolf), using facilities and instrumentalities in interstate commerce, did unlawfully and knowingly combine, conspire, confederate, and agree with each other and with others, known and unknown to the Grand Jury, to unlawfully and willfully seize, inveigle, decoy, kidnap, abduct, and carry away and hold Brandon White for ransom, reward, and otherwise, that is, for the purpose of transporting him to a secure location where he could be assaulted and killed, in violation of Title 18, United States Code, Section 1201(a)(1).

228. On or about January 31, 2019, and continuing thereafter on February 1, 2019, in the Eastern District of Virginia, to effect the object of this conspiracy, the defendants, PETER LE, JOSEPH LAMBORN, YOUNG YOO, and SASCHA CARLISLE, and their co-conspirators committed overt acts, including the following:

a. On or about January 31, 2019, the defendants, PETER LE, JOSEPH LAMBORN, YOUNG YOO, and SASCHA CARLISLE, traveled by car from PETER LE's apartment in Merrifield, Virginia, to Loehmann's Plaza in Falls Church, Virginia, for the purpose of abducting Brandon White.

b. On or about January 31, 2019, in Falls Church, Virginia, the defendants, PETER LE, JOSEPH LAMBORN, YOUNG YOO, and SASCHA CARLISLE, abducted Brandon White from the parking lot of Loehmann's Plaza, forcing him into a vehicle.

c. On or about January 31, 2019, in Falls Church, Virginia, the defendants, PETER LE, JOSEPH LAMBORN, YOUNG YOO, and SASCHA CARLISLE, departed from Loehmann's Plaza in two vehicles, one of which held Brandon White.

d. Beginning on or about January 31, 2019, in Falls Church, Virginia, and continuing into the early morning of February 1, 2019, the defendants, PETER LE, JOSEPH LAMBORN, YOUNG YOO, and SASCHA CARLISLE, traveled in two vehicles to Richmond, Virginia, while holding Brandon White in one of the vehicles.

e. On or about February 1, 2019, in Richmond, Virginia, the defendants, PETER LE, JOSEPH LAMBORN, and YOUNG YOO, forcibly removed Brandon White from a vehicle, taking him into a wooded area.

f. On or about February 1, 2019, in Richmond, Virginia, the defendants, PETER LE, JOSEPH LAMBORN, and YOUNG YOO, killed Brandon White.

g. On or about February 1, 2019, in Richmond, Virginia, the defendants, PETER LE, JOSEPH LAMBORN, YOUNG YOO, and SASCHA CARLISLE, returned to Northern Virginia in two vehicles.

h. From on or about January 31, 2019, and continuing on February 1, 2019, the defendants, PETER LE, JOSEPH LAMBORN, YOUNG YOO, and SASCHA CARLISLE, communicated with each other and with other co-conspirators using cellular telephones for the purpose of abducting and killing Brandon White.

All in violation of Title 18, United States Code, Section 1201(a) and (c)

Count 5

Kidnapping Resulting in Death

THE GRAND JURY FURTHER CHARGES THAT:

229. Paragraph 226 of Count 4 of this indictment is re-alleged and incorporated as if fully set forth herein.

230. On or about January 31, 2019, and continuing thereafter on February 1, 2019, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), and YOUNG YOO (a/k/a YG), using facilities and instrumentalities in interstate commerce, did unlawfully and willfully seize, inveigle, decoy, kidnap, abduct, and carry away and hold Brandon White for ransom, reward, and otherwise, that is, for the purpose of transporting him to a secure location where he could be assaulted and killed, which resulted in the death of Brandon White, and did aid, abet, counsel, command, induce, and cause the commission of the offense,.

In violation of Title 18, United States Code, Section 1201(a)(1) and 2

Count 6

Conspiracy to Distribute Controlled Substances

THE GRAND JURY FURTHER CHARGES THAT:

231. Beginning in or about 2011, the exact date being unknown to the Grand Jury, and continuing until on or about the date of this Fourth Superseding Indictment, in the Eastern District of Virginia and elsewhere, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), ANTHONY NGUYEN THANH LE (a/k/a Ant), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), TONY MINH LE (a/k/a Sneaks, Sneaky, T, Tiger), SANG THANH HUYNH (a/k/a Cinco), YOUNG YOO (a/k/a YG), and SASCHA AMADEUS CARLISLE (a/k/a Sosa, Wolf), did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and with other persons, both known and unknown to the grand jury, to commit the following offenses:

a. to unlawfully, knowingly, and intentionally distribute five kilograms or more of a mixture and substance containing of a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

b. to unlawfully, knowingly, and intentionally distribute one thousand kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

c. to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of tetrahydrocannabinol (THC), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

d. to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of alprazolam (Xanax), a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

e. to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of 3,4-Methylenedioxy methamphetamine (a/k/a MDMA, ecstasy, molly), a Schedule I controlled substance;

f. to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of lysergic acid diethylamide (a/k/a LSD), a Schedule I controlled substance;

g. to unlawfully knowingly, and intentionally manufacture, distribute, and possess with the intent to manufacture and distribute 1,000 or more marijuana plants, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

h. to unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using controlled substances, in violation of Title 21, United States Code, Section 856;

i. to unlawfully, knowingly, and intentionally distribute controlled substances to persons under the age of twenty-one, in violation of Title 21, United States Code, Section 859;

j. to unlawfully, knowingly, and intentionally distribute controlled substances within 1,000 feet of a public school, in violation of Title 21, United States Code, Section 860;

k. to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to violate the provisions of Title 21 of the United States Code, including Title 21, United States Code, Sections 841, 856, 859, and 860;

l. to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to assist in avoiding detection for any such offense, all in violation of Title 21, United States Code, Section 861; and

m. to unlawfully, knowingly, and intentionally sell drug paraphernalia and to use the mails and other facilities of interstate commerce to transport drug paraphernalia, that is, devices for use in compounding, converting, concealing, producing, processing, preparing, ingesting, inhaling, or otherwise introducing into the human body unlawful controlled substances, including THC and marijuana and products derived from marijuana, in violation of Title 21, United States Code, Section 863.

All in violation of Title 21, United States Code, Section 846

Count 7

Killing While Engaged in Drug Trafficking

THE GRAND JURY FURTHER CHARGES THAT:

232. Paragraph 231 of Count 6 of this indictment is re-alleged and incorporated as if fully set forth herein.

233. On or about February 1, 2019, in Richmond, Virginia, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), and YOUNG YOO (a/k/a YG), while engaged in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), to wit: the conspiracy to distribute controlled substances, as set forth in Count 6 of this indictment, did knowingly, intentionally and unlawfully kill and counsel, command, induce, procure, and cause the intentional killing of Brandon White, and such killing did result.

In violation of Title 21, United States Code, Section 848(e)(1)(A)
and Title 18, United States Code, Section 2

Count 8

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

234. From in or about March 2017, and continuing until in or about January 2018, in Lorton, Virginia, in the Eastern District of Virginia, the defendant, PETER LE, did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

In violation of Title 21, United States Code, Section 856,
and Title 18, United States Code, Section 2

Count 9

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

235. From in or about November 2017, and continuing until in or about September 2018, in Merrifield, Virginia, in the Eastern District of Virginia, the defendant, PETER LE (a/k/a Savage, Loki, and Lorton King), did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

In violation of Title 21, United States Code, Section 856,
and Title 18, United States Code, Section 2

Count 10

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

236. From in or about September 2018, and continuing until in or about March 2019, in Dunn Loring, Virginia, in the Eastern District of Virginia, the defendant, PETER LE, (a/k/a Savage, Loki, and Lorton King), did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

In violation of Title 21, United States Code, Section 856,
and Title 18, United States Code, Section 2

Count 11

Distribution of Cocaine

THE GRAND JURY FURTHER CHARGES THAT:

237. On or about June 12, 2018, in Annandale, Virginia, in the Eastern District of Virginia, the defendant, PETER LE (a/k/a Savage, Loki, and Lorton King) and ANTHONY NGUYEN THANH LE (a/k/a Ant), did unlawfully, knowingly, and intentionally distribute approximately five ounces (138 grams) of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),
and Title 18, United States Code, Section 2

Count 12

Distribution of Marijuana

THE GRAND JURY FURTHER CHARGES THAT:

238. On or about June 12, 2018, in Annandale, Virginia, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King) and ANTHONY NGUYEN THANH LE (a/k/a Ant), did unlawfully, knowingly, and intentionally distribute approximately three pounds (1,332 grams) of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),
and Title 18, United States Code, Section 2

Count 13

Using, Carrying, Brandishing, and Discharging a Firearm Resulting in Death

239. On or about February 1, 2019, in Richmond, Virginia, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), and YOUNG YOO (a/k/a YG), did unlawfully and knowingly use, carry, brandish, and discharge a firearm during and in relation to a drug trafficking crime, to wit: conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841 and 846, as set forth in Count 6 of this indictment, and a crime of violence, to wit: murder in aid of racketeering activity, in violation of Title 18, United States Code, Section 1959(a)(1), as set forth in Count 3 of this indictment, each of which is incorporated herein, and in the course of said offenses, caused the death of Brandon White through the use of a firearm, and the killing constituted murder, as defined in Title 18, United States Code, Section 1111(a), in that the defendants, with malice aforethought, did unlawfully, willfully, and deliberately kill Brandon White by shooting him with a firearm and did aid, abet, and assist each other in the commission of the offense.

All in violation of Title 18, United States Code, Sections 924(c)(1) and (j), and 2

Count 14

Possessing a Destructive Device in Furtherance of a Drug Trafficking Offense

THE GRAND JURY FURTHER CHARGES THAT:

240. On or about July 14, 2016, in Dumfries, Virginia, in the Eastern District of Virginia, the defendant, TONY LE (a/k/a Sneaks, Sneaky, T, Tiger), did unlawfully and knowingly possess a destructive device, as defined by Title 26, United States Code, Section 5845(f), that is, an incendiary bomb, commonly known as a Molotov cocktail, in furtherance of a drug trafficking crime, that is, the conspiracy to distribute controlled substances, as set forth and charged in Count 6 of this indictment, which is re-alleged and incorporated herein by reference, and did aid, abet, and assist in the commission of this offense.

All in violation of Title 18, United States Code, Sections 924(c) and 2

Count 15

Possessing a Destructive Device in Furtherance of a Drug Trafficking Offense

THE GRAND JURY FURTHER CHARGES THAT:

241. On or about October 28, 2016, in Springfield, Virginia, in the Eastern District of Virginia, the defendant, TONY LE (a/k/a Sneaks, Sneaky, T, Tiger), did unlawfully and knowingly possess a destructive device, as defined by Title 26, United States Code, Section 5845(f), that is, an incendiary bomb, commonly known as a Molotov cocktail, in furtherance of a drug trafficking crime, that is, the attempted possession with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841, and did aid, abet, and assist in the commission of this offense.

All in violation of Title 18, United States Code, Sections 924(c) and 2

Count 16

Using, Carrying, and Possessing a Firearm during a Drug Trafficking Offense

THE GRAND JURY FURTHER CHARGES THAT:

242. On or about February 15, 2019, in Dunn Loring, Virginia, in the Eastern District of Virginia, the defendant, PETER LE, did unlawfully and knowingly use and carry a firearm, that is, a handgun, during and in relation to a drug trafficking crime, and did unlawfully and knowingly possess said firearm in furtherance of a drug trafficking crime, that is, the conspiracy to distribute controlled substances, as set forth and charged in Count 6 of this indictment, which is re-alleged and incorporated herein by reference.

All in violation of Title 18, United States Code, Section 924(c)

Count 17

Using, Carrying, and Possessing a Firearm during a Drug Trafficking Offense

THE GRAND JURY FURTHER CHARGES THAT:

243 On or about February 10, 2019, in the Eastern District of Virginia and elsewhere within the jurisdiction of this court, the defendant, JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), did unlawfully and knowingly use and carry a firearm, that is, a handgun, during and in relation to a drug trafficking crime, and did unlawfully and knowingly possess said firearm in furtherance of a drug trafficking crime, that is, the conspiracy to distribute controlled substances, as set forth and charged in Count 6 of this indictment, which is re-alleged and incorporated herein by reference.

All in violation of Title 18, United States Code, Section 924(c)

Count 18

Using, Carrying, and Possessing a Firearm during a Drug Trafficking Offense

THE GRAND JURY FURTHER CHARGES THAT:

244. On or about September 18, 2019, in the Eastern District of Virginia and elsewhere within the jurisdiction of this court, the defendant, SANG THANH HUYNH (a/k/a Cinco), did unlawfully and knowingly use and carry a firearm, that is, an Uzi semi-automatic pistol, during and in relation to a drug trafficking crime, and did unlawfully and knowingly possess said firearm in furtherance of a drug trafficking crime, that is, the conspiracy to distribute controlled substances, as set forth and charged in Count 6 of this indictment, which is re-alleged and incorporated herein by reference

All in violation of Title 18, United States Code, Section 924(c)

Count 19

Using, Carrying, and Possessing a Firearm during a Drug Trafficking Offense

THE GRAND JURY FURTHER CHARGES THAT:

245. On or about March 12, 2017, in the Eastern District of Virginia, the defendant, YOUNG YOO, did unlawfully and knowingly use and carry a firearm, that is, a handgun, during and in relation to a drug trafficking crime, and did unlawfully and knowingly possess said firearm in furtherance of that drug trafficking crime, that is, the conspiracy to distribute controlled substances, as set forth and charged in Count 6 of this indictment, which is re-alleged and incorporated herein by reference.

All in violation of Title 18, United States Code, Section 924(c)

Count 20

Obstruction of Justice

THE GRAND JURY FURTHER CHARGES THAT:

246. On or about February 26, 2019, in Richmond, Virginia, in the Eastern District of Virginia, the defendant, JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), did unlawfully and knowingly alter, destroy, mutilate, conceal, and cover up a tangible object, that is, the body of Brandon White, with the intent to impede, obstruct, and influence the investigation of a matter within the jurisdiction of a department and agency of the United States, that is, the investigation into the murder of Brandon White by JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga) and others.

In violation of Title 18, United States Code, Sections 1519 and 2

Count 21

Conspiracy to Commit Money Laundering

THE GRAND JURY FURTHER CHARGES THAT:

247. From a date unknown, but by at least in or around January 2017 and continuing through in and around February 2019, the exact dates being unknown to the Grand Jury, in Fairfax County, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, PETER LE (a/k/a Savage, Loki, and Lorton King), did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with CC-17 and others, both known and unknown to the Grand Jury, to commit an offense against the United States, in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is a conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as alleged in Count 6 of this Fourth Superseding Indictment, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Purposes and Objects of the Conspiracy

248. The primary objects of the conspiracy were for the conspirators to collect and spend cash proceeds earned from the unlawful sale of marijuana and other controlled substances in such a way as to avoid detection, seizure, and forfeiture by the United States, and to conceal and disguise the true nature, location, source, ownership and control of the drug proceeds.

Ways, Manners, and Means

249. The ways, manners, and means by which the defendant and his co-conspirators carried out the primary objects of the conspiracy included, but were not limited to, the following:

250. It was part of the conspiracy that PETER LE and his co-conspirators obtained over 1,000 kilograms of marijuana in California and then redistributed this marijuana in the Eastern District of Virginia and elsewhere.

251. It was further part of the conspiracy that PETER LE and his co-conspirators generated hundreds of thousands of dollars in drug proceeds from the unlawful sale of marijuana and other controlled substances in the Eastern District of Virginia and elsewhere.

252. It was further part of the conspiracy that PETER LE, his co-conspirators, and other individuals deposited cash proceeds obtained from selling marijuana and other controlled substances into various bank accounts at bank branches located in the Eastern District of Virginia and elsewhere.

253. It was further part of the conspiracy that some co-conspirators collected drug debts owed to PETER LE and other co-conspirators.

254. It was further part of the conspiracy that PETER LE directed co-conspirators to deposit cash proceeds obtained from selling marijuana and other controlled substances into various bank accounts at bank branches located in the Eastern District of Virginia and elsewhere.

255. It was further part of the conspiracy that PETER LE directed co-conspirators to deliver cash proceeds obtained from selling marijuana and other controlled substances to CC-17, who he then directed to deposit the cash drug proceeds into bank accounts held in her name.

256. It was further part of the conspiracy that CC-17 used her bank account with BB&T Bank to conduct financial transactions on behalf of PETER LE, in order to conceal the location, source, and ownership of the drug proceeds.

257. It was further part of the conspiracy that CC-17 and other co-conspirators used Venmo, a mobile payment service owned by PayPal, to receive payments for marijuana and other controlled substances.

258. It was further part of the conspiracy that CC-17 and other co-conspirators used drug proceeds to purchase cryptocurrency, in order to conceal the location, source, and ownership of the drug proceeds.

Overt Acts

259. In furtherance of the conspiracy, and to effect the objects thereof, PETER LE and his co-conspirators committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

260. Between in and around January 2017 and on or about February 15, 2019, PETER LE directed CC-17 to use her bank account ending in 5310 at BB&T Bank (the BB&T account) to conduct financial transactions with drug proceeds. This account was in the name of CC-17.

261. Between in and around January 2017 and on or about February 15, 2019, PETER LE directed CC-17 to use her Venmo account to receive payments for marijuana and other controlled substances and to conduct financial transactions with the drug proceeds. The Venmo account was in the name of CC-17.

262. Between in and around January 2017 and March 2019, CC-17 used her Venmo account to transfer approximately \$92,000 in drug proceeds to the BB&T account.

263. Between in and around January 2017 and March 2019, approximately \$68,000 in cash drug proceeds were deposited into the BB&T account.

264. Between in and around January 2017 and March 2019, CC-17 used approximately \$24,000 in drug proceeds deposited in the BB&T account to purchase bitcoin through Coinbase, which is a digital currency exchange.

265. On or about March 17, 2017, \$1,520 in cash drug proceeds were deposited into the BB&T account.

266. On or about March 23, 2017, \$2,410 in cash drug proceeds were deposited into the BB&T account.

267. On or about May 1, 2017, CC-17 transferred \$1,425 in drug proceeds from her Venmo account to the BB&T account.

268. On or about May 10, 2017, in Fairfax County, Virginia, within the Eastern District of Virginia, \$600 in cash drug proceeds were deposited into BB&T account.

269. On or about May 10, 2017, in Fairfax County, Virginia, \$1,000 in cash drug proceeds were deposited into BB&T account.

270. On or about June 15, 2017, CC-17 transferred \$540 in drug proceeds from her Venmo account to the BB&T account.

271. On or about June 19, 2017, CC-17 transferred \$350 in drug proceeds from her Venmo account to the BB&T account.

272. On or about June 28, 2017, CC-17 transferred \$150 in drug proceeds from her Venmo account to the BB&T account.

273. On or about June 28, 2017, CC-17 transferred \$600 in drug proceeds from her Venmo account to the BB&T account.

274. On or about July 10, 2017, CC-17 transferred \$800 in drug proceeds from her Venmo account to the BB&T account.

275. On or about July 13, 2017, CC-17 transferred \$300 in drug proceeds from her Venmo account to the BB&T account.

276. On or about July 14, 2017, CC-17 transferred \$200 in drug proceeds from her Venmo account to the BB&T account.

277. On or about July 14, 2017, CC-17 transferred \$500 in drug proceeds from her Venmo account to the BB&T account.

278. On or about July 31, 2017, \$3,020 in cash drug proceeds were deposited into the BB&T account.

279. On or about August 2, 2017, CC-17 transferred \$430 in drug proceeds from her Venmo account to the BB&T account.

280. On or about August 11, 2017, \$900 in cash drug proceeds were deposited into the BB&T account.

281. On or about September 5, 2017, CC-17 transferred \$450 in drug proceeds from her Venmo account to the BB&T account.

282. On or about September 26, 2017, CC-17 transferred \$330 in drug proceeds from her Venmo account to the BB&T account.

283. On or about October 2, 2017, in the Eastern District of Virginia, \$2,000 in cash drug proceeds were deposited into the BB&T account.

284. On or about October 4, 2017, CC-17 transferred \$1,000 in drug proceeds from her Venmo account to the BB&T account.

285. On or about October 31, 2017, CC-17 transferred \$400 in drug proceeds from her Venmo account to the BB&T account.

286. On or about November 1, 2017, CC-17 transferred \$850 in drug proceeds from her Venmo account to the BB&T account.

287. On or about December 1, 2017, \$2,770 in cash drug proceeds were deposited into the BB&T account.

288. On or about December 8, 2017, \$2,160 in cash drug proceeds were deposited into the BB&T account.

289. On or about December 11, 2017, CC-17 transferred \$109 in drug proceeds from her Venmo account to the BB&T account.

290. On or about December 11, 2017, CC-17 transferred \$250 in drug proceeds from her Venmo account to the BB&T account.

291. On or about December 11, 2017, CC-17 transferred \$500 in drug proceeds from her Venmo account to the BB&T account.

292. On or about December 11, 2017, CC-17 transferred \$1,435 in drug proceeds from her Venmo account to the BB&T account.

293. On or about December 11, 2017, CC-17 transferred approximately \$4,000 in drug proceeds from the BB&T account to Coinbase, in order to purchase cryptocurrency.

294. On or about January 3, 2018, \$2,900 in cash drug proceeds were deposited into the BB&T account.

295. On or about January 5, 2018, \$2,157 in cash drug proceeds were deposited into the BB&T account.

296. On or about February 14, 2018, CC-17 transferred \$1,000 in drug proceeds from her Venmo account to the BB&T account.

297. On or about February 15, 2018, CC-17 transferred \$500 in drug proceeds from her Venmo account to the BB&T account.

298. On or about February 16, 2018, CC-17 transferred \$500 in drug proceeds from her Venmo account to the BB&T account.

299. On or about February 26, 2018, CC-17 transferred \$1,000 in drug proceeds from her Venmo account to the BB&T account.

300. On or about April 30, 2018, CC-17 transferred \$4,585.53 in drug proceeds from the BB&T account to Coinbase, in order to purchase cryptocurrency.

301. On or about May 2, 2018, \$3,000 in cash drug proceeds were deposited into the BB&T account.

302. On or about May 7, 2018, in the Eastern District of Virginia, \$5,997 in cash drug proceeds were deposited into the BB&T account in three separate transactions.

303. On or about May 10, 2018, CC-17 transferred \$700 in drug proceeds from her Venmo account to the BB&T account.

304. On or about May 10, 2018, in the Eastern District of Virginia, \$2,600 in cash drug proceeds were deposited into the BB&T account.

305. On or about May 11, 2018, CC-17 transferred \$725 in drug proceeds from her Venmo account to the BB&T account.

306. On or about May 14, 2018, CC-17 transferred \$2,050 in drug proceeds from the BB&T account to Coinbase, in order to purchase cryptocurrency.

307. On or about June 6, 2018, \$3,570 in cash drug proceeds were deposited into the BB&T account.

308. On or about June 12, 2018, \$3,807 in cash drug proceeds were deposited into the BB&T account.

309. On or about June 14, 2018, \$4,000 in cash drug proceeds were deposited into the BB&T account.

310. On or about June 18, 2018, in the Eastern District of Virginia, \$2,000 in cash drug proceeds were deposited into the BB&T account in two separate transactions.

311. On or about September 25, 2018, \$2,000 in cash drug proceeds were deposited into the BB&T account.

312. On or about October 2, 2018, \$2,000 in cash drug proceeds were deposited into the BB&T account.

313. On or about December 10, 2018, CC-17 transferred \$4,500 in drug proceeds from the BB&T account to Coinbase, in order to purchase cryptocurrency.

314. On or about February 6, 2019, in Vienna, Virginia, within the Eastern District of Virginia, \$3,000 in cash drug proceeds were deposited into the BB&T account.

In violation of Title 18, United States Code, Section 1956(h)

Counts 22-37**Money Laundering****THE GRAND JURY FURTHER CHARGES THAT:**

315. On or about the following dates, within the Eastern District of Virginia and elsewhere, the defendant, SANG THANH HUYNH (a/k/a Cinco), did knowingly conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is a conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as alleged in Count 6 of this Fourth Superseding Indictment, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and to avoid a transaction reporting requirement under State and Federal law, and that while conducting and attempting to conduct such financial transactions, the defendant knew that the property involved in the financial transactions, represented the proceeds of some form of unlawful activity.

Count	Date	Description of Transaction	Amount
22	October 11, 2016	Cash deposit into Wells Fargo account ending in 5566	\$7,300
23	October 11, 2016	Cash deposit into Wells Fargo account ending in 5566	\$7,000
24	October 11, 2016	Cash withdrawal from Wells Fargo account ending in 5566	\$9,500
25	October 12, 2016	Cash withdrawal from Wells Fargo account ending in 5566	\$5,000
26	August 16, 2016	Cash deposit into Navy Federal Credit Union account ending in 6745	\$7,860
27	August 17, 2016	Cash deposit into Navy Federal Credit Union account ending in 6745	\$9,000
28	August 22, 2016	Cash withdrawal from Navy Federal Credit Union account ending in 6745	\$9,000
29	August 22, 2016	Cash withdrawal from Navy Federal Credit Union account ending in 6745	\$8,000

Count	Date	Description of Transaction	Amount
30	March 28, 2017	Cash deposit into Bank of America account ending in 8004	\$9,400
31	March 29, 2017	Cash deposit into Bank of America account ending in 8004	\$9,900
32	March 30, 2017	Cash withdrawal from Bank of America account ending in 8004	\$9,800
33	April 3, 2017	Cash withdrawal from Bank of America account ending in 8004	\$9,210
34	April 4, 2017	Cash deposit into Bank of America account ending in 8004	\$9,900
35	April 5, 2017	Cash deposit into Bank of America account ending in 8004	\$7,000
36	April 6, 2017	Cash withdrawal from Bank of America account ending in 8004	\$9,800
37	April 7, 2017	Cash withdrawal from Bank of America account ending in 8004	\$9,800

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (B)(ii) and 2

Notice of Forfeiture

THE GRAND JURY FURTHER ALLEGES THAT:

316. The Grand Jury finds that there is probable cause that the property described in this NOTICE OF FORFEITURE is subject to forfeiture pursuant to the statutes described herein.

317. The defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), ANTHONY NGUYEN THANH LE (a/k/a Ant), JOSEPH DUK-HYUN LAMBORN (a/k/a Joe Yu, Trigga), TONY MINH LE (a/k/a Sneaks, Sneaky, T, Tiger), SANG THANH HUYNH (a/k/a Cinco), YOUNG YOO (a/k/a YG), and SASCHA AMADEUS CARLISLE (a/k/a Sosa, Wolf), are hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of any of the offenses set forth in this Fourth Superseding Indictment, they shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition used in or involved in the violation.

318. Defendants are hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of the offense set forth in Count 1 this Fourth Superseding Indictment, they shall forfeit to the United States, pursuant to 18 U.S.C. § 1963, the following: (1) any interest acquired or maintained in violation of 18 U.S.C. § 1962; (2) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over any enterprise which they have established, operated, controlled, conducted, or participated in the conduct of, in violation of 18 U.S.C. § 1962; and (3) any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 18 U.S.C. § 1962.

319. Defendants are hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of either of the offenses set forth in Counts 4 and 5 of this Fourth

Superseding Indictment, they shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

320. Defendants are hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of any of the offenses set forth in Counts 6 through 12 of this Fourth Superseding Indictment, they shall forfeit to the United States, pursuant to 21 U.S.C. § 853, the following: (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation; and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation.

321. Defendants are hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of any of the offenses set forth in Counts 21 through 38 of this Fourth Superseding Indictment, they shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the violation, or any property traceable to such property.

322. The assets subject to forfeiture include, but are not limited to, a monetary judgment in the amount that each defendant obtained from the violations set forth in Counts 1 and 4 through 12 of this Fourth Superseding Indictment, as well as in an amount corresponding to any property involved in the violations set forth in Counts 21 through 37 of this Fourth Superseding Indictment.

323. As to Count 1 of this Fourth Superseding Indictment, pursuant to 18 U.S.C. § 1963(m), the defendants shall forfeit substitute property, if, by any act or omission of the defendants, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the

jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

324. As to Counts 2 through 37 of this Fourth Superseding Indictment, pursuant to 21 U.S.C. § 853(p), the defendants shall forfeit substitute property, if, by any act or omission of the defendants, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Sections 924(d), 981(a)(1)(C), 982(a)(1) and 1963; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461(c)

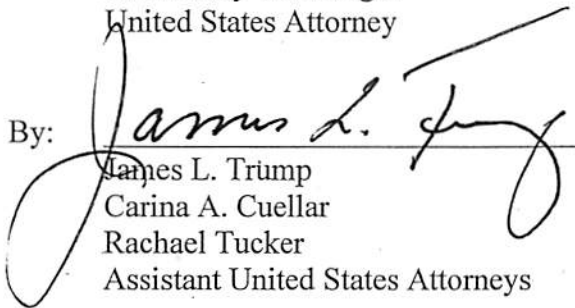
A TRUE BILL:

Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

G. Zachary Terwilliger
United States Attorney

By:


James L. Trump
Carina A. Cuellar
Rachael Tucker
Assistant United States Attorneys