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OCT 16 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNDERSEAL

MELINDA HAAG (CABN 132612)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RS

UNITED STATES OF AMERICA

CR No. 14 527

v.

ALLEN FONG,
a/k/a "Steve Nguyen,"
a/k/a "Steve Fujimoto,"
a/k/a "John Fujimoto,"
a/k/a "David Lee,"
a/k/a "May Lee,"
a/k/a "Sakura Susa,"
a/k/a "Jeff Law," and
a/k/a "Jeff Woo,"
YA HUAI HUNG,
LEOW WAN RU VERON,
a/k/a "Brisa,"
ROBERT CHUN,
JIE MU,
a/k/a "Jane,"
LAURENCE SHU KWAN LEE,
KEVIN HARTIG,
WAYLEN FONG,
ANGELINA CHUONG, and
CHONTHICHA JAEMRATANASOPHIN,
a/k/a "Nana,"

Defendants.

) VIOLATIONS: Title 18, United States Code, Section
) 1962(d) - Conspiracy to Conduct Enterprise Affairs
) Through a Pattern of Racketeering Activity (one
) count); Title 18, United States Code, Sections 371 &
) 1952(a)(3) - Conspiracy to Use Facility in Interstate
) and Foreign Commerce to Promote Prostitution) (one
) count); Title 18, United States Code, Sections
) 1952(a)(3) and 2 - Use of Facility in Interstate
) Commerce to Promote Prostitution (eleven counts);
) Title 18, United States Code, Sections 1956(h) &
) 1956(a)(1)(A)(i) - Conspiracy to Launder Monetary
) Instruments) (one count); Title 18, United States
) Code, Sections 1956(a)(1)(A)(i) and 2 - Laundering
) Monetary Instruments (nine counts); Title 18, United
) States Code, Section 1956(h) & 1956(a)(2)(A) -
) Conspiracy to Transport Funds to Promote Unlawful
) Activity (one count); Title 18, United States Code,
) Sections 1956(a)(2)(A) and 2 - Transporting Funds to
) Promote Unlawful Activity (seven counts); Title 18,
) United States Code, Section 371, Title 18, United
) States Code, Section 2421, & Title 8, United States
) Code, Section 1328 - Conspiracy to Transport for
) Prostitution and Importation of Alien for Immoral
) Purpose (one count); Title 18, United States Code,
) Sections 981, 982, 1963, and 2428, and Title 28,
) United States Code, Section 2461 - Forfeiture
) Allegations

SAN FRANCISCO VENUE

Indictment

1 INDICTMENT

2 The Grand Jury charges:

3 COUNT ONE: (18 U.S.C. § 1962(d) – Conspiracy to Conduct Enterprise Affairs Through A Pattern of
4 Racketeering Activity)

5 A. *The Racketeering Enterprise*

6 1. At all times relevant to this Indictment, in the Northern District of California and
7 elsewhere, the defendants,

8 ALLEN FONG (a/k/a “Steve Nguyen,” a/k/a “Steve Fujimoto,” a/k/a “John Fujimoto,”
9 a/k/a “David Lee,” a/k/a “May Lee,” a/k/a “Sakura Susa,” a/k/a “Jeff Law,” and a/k/a
10 “Jeff Woo”),

11 YA HUAI HUNG,

12 LEOW WAN RU VERON (a/k/a “Brisa”),

13 ROBERT CHUN,

14 JIE MU (a/k/a “Jane”),

15 LAURENCE SHU KWAN LEE,

16 KEVIN HARTIG,

17 WAYLEN FONG,

18 ANGELINA CHUONG, and

19 CHONTHICHA JAEMRATANASOPHIN (a/k/a “Nana”),

20 together with others known and unknown to the grand jury, were members and associates of a
21 prostitution organization which operated approximately forty brothels in the greater San Francisco Bay
22 Area from at least August 2002 through at least July 29, 2014. The organization and the individuals who
23 associated with it for criminal purposes constituted an “enterprise,” as defined by Title 18, United States
24 Code, Section 1961(4) (hereinafter the “Enterprise”), that is, a group of individuals associated in fact.
25 The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for
26 the common purpose of achieving the objectives of the Enterprise. The Enterprise was engaged in, and
27 its activities affected, interstate and foreign commerce.
28

1 B. *Purposes of the Enterprise*

2 2. The purposes of the Enterprise included, but are not limited to: (i) enriching the members
3 and associates of the Enterprise through, among other things, recruiting adult females, primarily from
4 Asian countries, to work as prostitutes in the Northern District of California and elsewhere; (ii) keeping,
5 maintaining, controlling, supporting, employing, and harboring said prostitutes; (iii) collecting the
6 Enterprise's share of the prostitutes' earnings; and (iv) engaging in financial transactions in interstate
7 and foreign commerce to promote, manage, establish, carry on, and facilitate the prostitution operation.

8 C. *The Means and Methods of the Enterprise*

9 3. Defendants and their co-conspirators used the following methods and means, among
10 others, to conduct and participate in the affairs of the Enterprise:

11 a. Members and associates of the Enterprise solicited, enticed, and persuaded adult
12 females, primarily from Asian countries, to work for the Enterprise as prostitutes in the Northern District
13 of California and elsewhere. The importation of Asian women into the United States for the purpose of
14 prostitution was facilitated by various methods utilized by the Enterprise, including making the flight
15 reservations and/or purchasing airline tickets for Asian women from foreign countries and within the
16 United States, including for known prostitutes employed or associated with the Enterprise; instructing
17 Asian women entering the United States to place on their immigration entry document (I-94) a
18 residential address on 21st Avenue in San Francisco (hereafter "San Francisco Residence"), the
19 residential address of defendant YA HUAI HUNG in San Francisco, which is property owned by
20 defendant ALLEN FONG; and other addresses associated with the Enterprise, as the location they
21 intend to stay while in the United States; and transportation services from the airport to the brothels.

22 b. The Enterprise rented the apartments used as brothels through nominee lessees for
23 limited periods of time, and then opened other brothels, often with overlapping rental periods. The
24 nominee lessees included defendants ALLEN FONG, KEVIN HARTIG, WAYLEN FONG, ROBERT
25 CHUN, and ANGELINA CHUONG, co-conspirators William Sharon and Alex Chan, and other
26 associates. PG&E accounts for various Enterprise brothels were opened in the names of defendants
27 ALLEN FONG, KEVIN HARTIG, WAYLEN FONG, ROBERT CHUN, and ANGELINA CHUONG,
28 co-conspirators William Sharon and Alex Chan, and other associates. The Enterprise paid the rent,

1 deposits, and/or utilities for the brothels from money orders, cashier checks, and various banks,
2 including the joint account of defendant ALLEN FONG and co-conspirator William Sharon at the
3 United Commercial Bank ("UCB"); the Bank of America business account for Zenvision Spa and the JP
4 Morgan Chase Bank account held jointly by defendants ALLEN FONG and YA HUAI HUNG;
5 defendant ALLEN FONG's separate UCB/East West Bank account; the Bank of America account held
6 in Sakura Susa's name, but used by ALLEN FONG; and the separate bank accounts of defendants
7 KEVIN HARTIG and ANGELINA CHUONG and co-conspirator Alex Chan.

8 c. The Enterprise used social networking websites such as MyRedbook.com,
9 Craigslist.org, and Backpage.com to post advertisements for prostitution services, which included
10 contact information and photographs of nude and partially nude women assuming provocative and
11 suggestive poses.

12 d. To avoid law enforcement detection, the telephone numbers placed in the
13 Enterprise's prostitution advertisements were typically from telephone-shielding services which
14 incorporated Voice over Internet Protocol ("VoIP") technology, which immediately forwarded calls
15 coming into the VoIP numbers to cellular telephones assigned to fictitious subscribers.

16 e. The Enterprise's telephone operators such as defendant JIE MU (aka "Jane")
17 answered the calls for telephone numbers posted on the website advertisements for prostitution services,
18 coordinated the meeting place between the prostitutes and their customers ("Johns"), and directed the
19 "Johns" to a particular brothel.

20 f. The prostitutes kept approximately two-thirds of their earnings from the "Johns"
21 and paid one-third to the Enterprise, primarily through defendant ALLEN FONG.

22 g. From at least March 4, 2004, through October 3, 2013, members of the Enterprise
23 sent numerous outgoing international wire transfers to Asian countries such as Singapore, Thailand,
24 China, Hong Kong, Taiwan, Vietnam, and the Philippines, including to known Enterprise members and
25 prostitutes.

26 h. Members of the Enterprise provided logistical support for the brothels and the
27 prostitutes, including helping the prostitutes move in and out of brothels, transporting the prostitutes
28 from one brothel to another brothel, making bulk purchases of condoms from out-of-state condom

1 companies and delivering the condoms and other supplies to the brothels, and moving furniture and
2 household items into and out of the brothels.

3 i. The Enterprise expanded the scope, nature, and geographical range of its
4 prostitution activities by opening additional brothels in different cities, enlarging its operations,
5 soliciting new prostitutes to work for the Enterprise, and increasing the roles of Enterprise members to
6 promote and carry on the prostitution business.

7 *D. The Roles of the Defendants Within the Enterprise*

8 4. At various times relevant to this Indictment, the defendants' roles in the Enterprise
9 included, but were not limited to, the following:

10 a. ALLEN FONG is the head of the Enterprise. FONG was involved in the
11 recruitment of prostitutes from foreign countries and facilitated their importation into the United States;
12 the rental of apartments for use as brothels; and payments for the rent, deposits, and utilities at the
13 brothels, as well as other aspects of the operation, including online advertisements for prostitution
14 services, bulk condom purchases from out-of-state companies, and international and domestic airline
15 tickets for numerous Asian women, including for known prostitutes employed or associated with the
16 Enterprise. In addition, FONG transmitted numerous international wire transfers to Enterprise members,
17 including prostitutes, in foreign countries. FONG recruited other members and associates of the
18 Enterprise to promote its business and operations such as taking photographs of the prostitutes, posting
19 those photographs and advertisements for sexual services online, answering the telephone contact
20 numbers listed on the advertisements, and coordinating the sexual liaisons between the "Johns" and the
21 prostitutes. FONG was also involved in the day-to-day operations of the brothels such as delivering bulk
22 condoms and other supplies to the brothels, transporting prostitutes from the airport to the brothels and
23 between brothels, moving furniture and household items into and out of the brothels, and picking up the
24 Enterprise's share of the prostitutes' earnings from the brothels.

25 b. YA HUAI HUNG was ALLEN FONG's partner at the Zenvision Spa operated as
26 an Enterprise brothel. HUNG opened two joint bank accounts with ALLEN FONG at the Bank of
27 America on behalf of Zenvision Spa and JP Morgan Chase Bank. From both bank accounts, numerous
28 payments were made for the operation of the Enterprise's prostitution operation, including payments for

1 renting Zenvision Spa and other Enterprise brothels, prostitution advertisements, bulk purchase of
2 condoms, VoIP telephone-shielding services, air fare for Asian women, including known Enterprise
3 prostitutes, and wire transfers and other payments to co-conspirators and prostitutes. On August 12,
4 2013, YA HUAI HUNG and another Enterprise prostitute were present inside the brothel at 1341 David
5 Street, Apt #107, San Mateo, California, which was leased by ALLEN FONG.

6 c. LEOW WAN RU VERON (a/k/a "Brisa") recruited prostitutes in Singapore to
7 work for the Enterprise in the United States. LEOW WAN RU VERON was also a prostitute.
8 VERON was paid for her services on behalf of the Enterprise, including at least twenty-three outgoing
9 international wire transfers, totaling \$179,218.00, ranging from \$2,500.00 to \$18,000.00, sent to
10 VERON's DBS Bank Account in Singapore from on or about March 3, 2007, through June 30, 2011.
11 Those wire transfers were funded from the Zenvision Bank of America and JP Morgan Chase Bank
12 accounts held jointly by ALLEN FONG and YA HUAI HUNG; the United Commercial Bank account
13 held jointly by ALLEN FONG and co-conspirator William Sharon; the Cathay Bank account held by
14 ALLEN FONG; the United Commercial/East West Bank account held by ALLEN FONG; the Bank of
15 America and JP Morgan Chase Bank accounts held by LEOW WAN RU VERON; and the Citibank
16 account held by co-conspirator Alex Chan.

17 d. ROBERT CHUN took photographs of nude and partially nude prostitutes and
18 posted those photographs online, together with advertisements offering their sexual services. CHUN also
19 updated and revised the prostitution advertisements and assisted ALLEN FONG in updating prostitution
20 advertisements posted by FONG. CHUN's cellular telephone contained at least thirteen text messages
21 between CHUN and ALLEN FONG from approximately May 5, 2013, to July 4, 2013, where they
22 discuss taking photographs and making Internet postings for female workers. CHUN'S computers
23 contained photographs of nude and partially nude Enterprise prostitutes, including defendants YA HUAI
24 HUNG and LEOW WAN RU VERON, and co-conspirators SJ, VK, and SWO. In addition, CHUN was
25 the nominee lessee for at least two of the apartments used as brothels by the Enterprise. CHUN was
26 paid \$500.00 per month by ALLEN FONG for his services as a nominee lessee for each of the
27 apartments that he rented. CHUN was also provided with cash or cashier's checks from ALLEN FONG
28 to pay the rent for the apartments.

1 e. JIE MU (a/k/a "Jane") was a telephone operator who answered calls to the
2 telephone numbers posted on the Enterprise's online advertisements for prostitution services,
3 coordinated the meeting place between the "Johns" and the prostitutes, directed the "Johns" to a
4 particular brothel, and provided them with codes to security gates and doors to permit access to brothels
5 in secure buildings. On several occasions, JIE MU picked up prostitutes arriving from Asian countries at
6 the San Francisco International Airport. JIE MU also made cash pickups of the Enterprise's share of the
7 prostitutes' earnings from the brothels, helped prostitutes move in and out of the brothels, and
8 occasionally took some of the prostitutes sightseeing, shopping, or on other errands. JIE MU sent a
9 \$2,000.00 international wire transfer to co-conspirator SWO in Singapore, a prostitute who worked for
10 the Enterprise. When her husband LAURENCE SHU KWAN LEE assumed the role of internet
11 advertiser for the Enterprise, JIE MU provided LEE with a computer apparatus which contained data
12 related to the online prostitution advertisements provided to her by ROBERT CHUN.

13 f. LAURENCE SHU KWAN LEE posted advertisements for prostitution services
14 on various Internet websites on behalf of the Enterprise. LEE used pre-paid gift cards to pay for the
15 Internet postings and also to purchase telephone numbers from telephone-shielding services. LEE either
16 created or purchased the e-mail addresses associated with the fictitious subscribers listed in the
17 advertisements. LEE was paid \$500.00 in cash per month by ALLEN FONG for each brothel that he
18 advertised. On a number of occasions, LEE drove his wife JIE MU to the brothels where she picked up
19 the Enterprise's share of the prostitutes' earnings and also dropped off supplies and cellular telephones
20 for the prostitutes. LEE also helped prostitutes move into, and move out of, several brothels.

21 g. KEVIN HARTIG was the nominee lessee for four apartments used as brothels by
22 the Enterprise, and opened the PG&E accounts for three of those brothels. Rents, deposits, and/or
23 PG&E utility payments were made from HARTIG's Wells Fargo Bank account, the United
24 Commercial/East West Bank account of ALLEN FONG, and the JP Morgan Chase Bank account held
25 jointly by ALLEN FONG and YA HUAI HUNG.

26 h. WAYLEN FONG was the nominee lessee for two apartments used as brothels by
27 the Enterprise, and opened the PG&E accounts for both apartments. His brother ALLEN FONG paid
28 for the PG&E services at both apartments from his United Commercial/East West Bank account. The

1 rent and/or deposits for those apartments were paid directly by WAYLEN FONG, or indirectly through
2 money orders remitted in the name of "Waylen Fong."

3 i. ANGELINA CHUONG was the nominee lessee for 2759 S. Norfolk Street, Apt
4 no. 211, San Mateo, California, and was paid \$700.00 in cash per month by ALLEN FONG for her
5 services as a nominee lessee. On February 2, 2012, the date CHUONG signed the rental application for
6 Apt no. 211, she provided the leasing office with a rent deposit of \$473.65 issued from her Wells Fargo
7 Bank account. Through monies provided by ALLEN FONG, CHUONG paid the rent for Apt no. 211,
8 which included at least two money orders, totaling \$1,767.83, dated February 8, 2012, and signed by
9 CHUONG. CHUONG opened the PG&E account for Apt no. 211, and ALLEN FONG paid the PG&E
10 bills. Approximately six weeks after CHUONG signed the lease for Apt no. 211 on February 7, 2012,
11 CHUONG leased her father-in-law's house at 2401 Erin Place, South San Francisco, California, to
12 Enterprise members and gave ALLEN FONG the key to the house. On or about September 10, 2012, a
13 bulk shipment of 2,000 condoms, purchased by ALLEN FONG on August 25, 2012, was delivered via
14 the United Parcel Service to 2401 Erin Place, South San Francisco, California, and the same address was
15 used as the billing address for ALLEN FONG's purchase of an additional 2,000 condoms on March 12,
16 2013.

17 j. CHONTHICHA JAEMRATANASOPHIN (a/k/a "Nana") was a prostitute who
18 was working at the Enterprise brothel on 3 Plaza View Lane, Apt no. 309, Foster City, CA, leased by
19 ALLEN FONG, during an undercover law enforcement operation on November 22, 2013. After that
20 brothel was closed down by the Foster City Police Department on or about November 22, 2013,
21 CHONTHICHA JAEMRATANASOPHIN and ALLEN FONG, posing as a couple, went to another
22 leasing office on or about January 22, 2014, where FONG leased 2719 S. Norfolk Street, Apt no. 311,
23 San Mateo, CA. JAEMRATANASOPHIN sequentially used the addresses of approximately five
24 Enterprise brothels, and ALLEN FONG's residential address, as her residential address from November
25 2011 to February 2014, as set forth on her JP Morgan Chase Bank statements. The rental records for the
26 Enterprise brothel at 1341 David Street, Apt no. 107, San Mateo, CA, leased by ALLEN FONG, list
27 CHONTHICHA JAEMRATANASOPHIN as a "co-resident." The JP Morgan Chase Bank account held
28 by JAEMRATANASOPHIN funded twenty outgoing international wire transfers, totaling \$109,300.00,

1 ranging from \$1,800.00 to \$9,000.00, to Singapore and Thailand from December 5, 2011, through
2 October 3, 2013.

3 E. *The Racketeering Conspiracy*

4 5. Beginning from at least August 2002, and continuing to at least July 29, 2014, in the
5 Northern District of California and elsewhere, the defendants,

6 ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
7 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
8 "Jeff Woo"),

8 YA HUAI HUNG,

9 LEOW WAN RU VERON (a/k/a "Brisa"),

10 ROBERT CHUN,

11 JIE MU (a/k/a "Jane"),

12 LAURENCE SHU KWAN LEE,

13 KEVIN HARTIG,

14 WAYLEN FONG,

15 ANGELINA CHUONG, and

16 CHONTHICHA JAEMRATANASOPHIN (a/k/a "Nana"),

17 together with others known and unknown to the grand jury, being members employed by and associated
18 with the Enterprise, which enterprise was engaged in, and the activities of which affected, interstate and
19 foreign commerce, did knowingly and intentionally conspire with each other, and with other persons, to
20 violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and
21 indirectly, in the conduct of the Enterprise's affairs through a pattern of racketeering activity, as defined
22 in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity
23 consisted of multiple acts indictable under Title 18, United States Code, Section 1952 (Use of Facility in
24 Interstate and Foreign Commerce to Promote Prostitution); Title 18, United States Code, Section 1956
25 (Laundering of Monetary Instruments); Title 18, United States Code, Section 2421 (Transportation for
26 Prostitution), and Title 8, United States Code, Section 1328 (Importation of Alien for Immoral Purpose).

27 6. It was part of the conspiracy that each defendant agreed that a conspirator would commit
28 at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

1 G. Overt Acts

2 7. In furtherance of the conspiracy and to accomplish the object of the conspiracy, the
3 defendants and their co-conspirators, and others known and unknown to the Grand Jury, committed the
4 following overt acts, among others, in the Northern District of California and elsewhere, on or about the
5 dates set forth below, and as set forth in paragraphs 10, 17, 22, and 29 of this Indictment, incorporated
6 by reference herein.

7 a. As set forth in the table below, the following conspirators leased the properties used as
8 Enterprise brothels for the periods indicated below:

9

Overt Act	Brothel Location	Lease Holder(s)	Application Date	Approximate Dates of Lease	Approximate Dates Brothels Vacated
10 1	Zenvision Spa 2572 Appian Way, Pinole, CA	William Sharon	8/29/02	8/29/02 to 3/16/09	3/16/09
11 2	3144 La Selva Circle, Apt #6, San Mateo, CA	Allen Fong & unnamed co- conspirator (CC #1)	3/30/07	4/09/07 to 7/31/07	11/12/07
12 3	1315 Palos Verdes Drive, Apt #1, San Mateo, CA	William Sharon	10/08/07	10/11/07 to 10/10/08	3/31/08
13 4	701 Salt Ct, Redwood City, CA	William Sharon	10/19/07	10/24/07 to 4/30/08	12/29/07
14 5	590 Avocet Drive, Apt #7106, Redwood City, CA	William Sharon	11/03/07	11/9/07 to 2/08/08	2/08/08
15 6	247 Arriba Drive, Apt #604, Sunnyvale, CA	William Sharon	2/12/08	2/12/08 to 5/11/08	6/22/08
16 7	1145 Alameda De Las Pulgas, Apt. #9, Belmont, CA	Allen Fong & William Sharon	2/27/08	2/29/08 to 4/30/08	4/24/08
17 8	3 Avocet Drive, Apt #3-104, Redwood City, CA	William Sharon	3/12/08	3/14/08 to 6/13/08	6/23/08
18 9	3321 La Selva Circle, Apt #2, San Mateo, CA	William Sharon	4/10/08	4/10/08 to 10/08/09	11/01/09
19 10	2723 S. Norfolk Street, Apt #311, San Mateo, CA	William Sharon	5/09/08	5/10/08 to 5/09/09	5/09/09
20 11	337 S. Fremont Street, Apt #119, San Mateo, CA	William Sharon	5/24/08	5/27/08 to 8/26/08	3/20/09

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12	5624 Stevens Creek Blvd, Apt #151, San Mateo, CA	William Sharon	7/22/08	7/23/08 to 10/22/08	12/02/08
13	149 Maple Street, Apt #1306, Redwood City, CA	William Sharon	8/08/08	8/16/08 to 5/31/09	10/10/08
14	39440 Civic Center Drive, Apt #214, Fremont, CA	William Sharon	9/23/08	9/25/08 to 12/24/08	11/07/08
15	505 Shell Pkwy, Apt #1106, Redwood City, CA	William Sharon	9/30/08	10/07/08 to 4/06/09	4/30/09
16	5624 Stevens Creek Blvd, Apt #354, Cupertino, CA	Waylen Fong	11/30/08	12/02/08 to 3/01/09	10/15/09
17	1624 Hope Drive, Apt #621, Santa Clara, CA	Waylen Fong	3/23/09	3/23/09 to 7/22/09	7/22/09
18	19608 Pruneridge Ave, Apt #8105, Cupertino, CA	William Sharon	4/07/09	4/07/09 to 8/06/09	10/01/09
19	20425 Via Pavisio, Apt #D-14, Cupertino, CA	William Sharon	7/31/09	8/04/09 to 3/31/10	4/13/10
20	950 E. Hillsdale Blvd, Apt #101, Foster City, CA	William Sharon	11/10/09	11/10/09 to 5/09/10	5/20/10
21	700 Agnew Rd, Apt #210, Santa Clara, CA	William Sharon	11/19/09	11/19/09 to 3/12/10	3/12/10
22	3297 La Selva Street, Apt #2, San Mateo, CA	Alex Chan	2/04/10	2/05/10 to 6/27/10	6/29/10
23	2723 S. Norfolk Street, Apt #211, San Mateo, CA	Alex Chan	2/18/10	2/22/10 to 2/21/11	9/09/10
24	744 Edgewater Blvd, Apt #201, Foster City, CA	Alex Chan	2/19/10	3/14/10 to 9/13/10	9/13/10
25	2715 S. Norfolk St, Apt #111, San Mateo, CA	Alex Chan	8/19/10	9/09/10 to 3/08/11	1/27/12
26	5600 Stevens Creek Blvd, Apt #311, Cupertino, CA	Alex Chan	9/10/10	9/11/10 to 12/10/10	12/10/10
27	853 Commodore Drive, Apt #464, San Bruno, CA	William Sharon	10/16/10	10/16/10 to 9/15/11	9/15/11
28	1000 Foster City Blvd, Apt #4408, Foster City, CA	Robert Chun	4/19/11	5/11/11 to 2/29/12	4/09/12
29	7800 El Camino Real, Apt #122,	Robert Chun	9/20/11	9/29/11 to 12/28/11	12/28/11

	Colma, CA				
30	1000 Foster City Blvd, Apt #2109, Foster City, CA	Kevin Hartig	12/31/11	1/27/12 to 7/31/12	9/28/12
31	1000 Foster City Blvd, Apt #3208, Foster City, CA	Unnamed CC #2	1/31/12	1/31/12 to 10/05/12	10/05/12
32	2759 S. Norfolk St, Apt #211, San Mateo, CA	Angelina Chuong	2/02/12	2/07/12 to 11/06/12	8/10/12
33	2401 Erin Place, South San Francisco, CA (lessor Angelina Chuong)	Enterprise members	On or about 3/19/12	3/19/12 to at least 9/30/12	On or about 9/30/12
34	2759 S. Norfolk St, Apt #103, San Mateo, CA	Kevin Hartig	8/06/12	8/08/12 to 6/07/13	6/07/13
35	1175 Park Place, Apt #103, San Mateo, CA	Kevin Hartig	10/03/12	10/04/12 to 4/03/13	2/18/13
36	2187 Vista Del Mar, San Mateo, CA	Kevin Hartig & Unnamed CC #2	10/12/12	10/12/12 to 10/11/13	8/26/13
37	1341 David Street, Apt #107, San Mateo, CA	Allen Fong	2/07/13	2/15/13 to 8/14/13	8/31/13
38	700 Agnew Road, Apt #134, Santa Clara, CA	Allen Fong	3/18/13	3/18/13 to 8/10/13	6/01/13
39	3 Plaza View Ln, Apt # 309 Foster City, CA 94404	Allen Fong	6/07/13	6/07/13 to 3/01/14	11/30/13
40	2719 S. Norfolk St, Apt #311, San Mateo, CA	Allen Fong	1/10/14	1/22/14 to 1/21/15	7/29/14

b. The following additional overt acts, among others, were committed by the defendants and their co-conspirators, and others known and unknown to the Grand Jury, in the Northern District of California and elsewhere, on or about the dates set forth below:

Overt Act	Approximate Date	
41	8/29/02	William Sharon and an associate signed the lease for the Enterprise brothel at Zenvision Spa.
42	4/21/05	A "Registration Form for Commercial Employers" dated 4/21/05, and signed by ALLEN FONG, was filed with the California Employment Development Department ("EDD") identifying YA HUAI HUNG as the "individual owner" of Zenvision Spa and ALLEN FONG as its "manager."
43	2/20/08	An Enterprise prostitute sexually solicited an undercover police officer at 1315 Palos Verdes Drive, Apt #1, San Mateo, CA, leased by William Sharon.

1	44	5/08/08	ALLEN FONG initiated the rental of 2723 S. Norfolk Street, Apt #311, San Mateo, CA, and asked to complete the lease in the name of his
2			"father-in-law" William Sharon.
3	45	5/09/08	ALLEN FONG and William Sharon arrived together to rent 2723 S. Norfolk Street, Apt #311, San Mateo, CA, and Sharon signed the lease.
4			
5	46	5/10/08	Using a pickup truck, ALLEN FONG moved household items into 2723 S. Norfolk Street, Apt #311, San Mateo, CA.
6	47	5/24/08	ALLEN FONG and William Sharon arrived together to lease 337 S. Fremont Street, Apt # 119, San Mateo, CA, and Sharon signed the rental application.
7			
8	48	6/30/08	JIE MU sent an outgoing international wire transfer for \$2,000.00 to co-conspirator SWO in Singapore funded from MU's Bank of America account (ending 66425).
9			
10	49	7/22/08	ALLEN FONG initiated the rental of 5624 Stevens Creek Blvd, Apt #151, Cupertino, CA, on behalf of William Sharon, whom ALLEN FONG described as his "father-in-law."
11			
12	50	7/23/08	ALLEN FONG brought William Sharon into the leasing office to sign the lease for 5624 Stevens Creek Blvd, Apt #151, Cupertino, CA.
13			
14	51	9/09/08	YA HUI HUNG sent an outgoing international wire transfer for \$3,500.00 to co-conspirator ELG in Singapore.
15	52	10/07/08	While posing as William Sharon's son-in-law, ALLEN FONG attempted to rent 505 Shell Pkwy, Apt #1106, Redwood City, in Sharon's name.
16			
17	53	10/07/08	ALLEN FONG brought William Sharon to the leasing office, where Sharon signed the rental documents for 505 Shell Pkwy, Apt #1106, Redwood City, CA.
18			
19	54	10/27/08	An Enterprise prostitute sexually solicited an undercover police officer at 337 S. Fremont Street, Apt #119, San Mateo, CA, leased by William Sharon.
20			
21	55	11/30/08	WAYLEN FONG provided the leasing staff with a \$99.00 deposit to rent 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA.
22	56	12/02/08	WAYLEN FONG opened the PG&E account for 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA.
23			
24	57	2/13/09	An Enterprise prostitute sexually solicited an undercover police officer at 337 S. Fremont Street, Apt #119, San Mateo, CA, leased by William Sharon.
25			
26	58	2/25/09	JIE MU and LAURENCE SHU KWAN LEE met with Enterprise prostitute SWO, and then drove SWO to the Washington Mutual Bank.
27			
28	59	2/25/09	In a recorded conversation inside his vehicle, LAURENCE SHU KWAN LEE asked SWO if she had withdrawn more than \$10,000.00 from the bank.

1			
2	60	3/23/09	WAYLEN FONG provided the rent payment, totaling \$2,304.52, to the leasing staff for 1624 Hope Drive, Apt #621, Santa Clara, CA.
3	61	3/23/09	WAYLEN FONG opened the PG&E account for 1624 Hope Drive, Apt #621, Santa Clara, CA.
4			
5	62	4/03/09	ALLEN FONG entered 505 Shell Pkwy, Apt # 1106, Redwood City, CA, leased by William Sharon.
6	63	4/06/09	ALLEN FONG entered 3321 La Selva Circle, Apt #2, San Mateo, CA, leased by William Sharon.
7			
8	64	4/06/09	ALLEN FONG delivered supplies to 1624 Hope Drive, Apt # 621, Santa Clara, CA, leased by WAYLEN FONG.
9	65	4/06/09	ALLEN FONG delivered supplies to 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA, leased by WAYLEN FONG.
10			
11	66	4/8/09	ALLEN FONG traveled to 2723 S. Norfolk Street, Apt #311, San Mateo, CA, leased by William Sharon.
12	67	4/23/09	Co-conspirator VK sexually solicited an undercover police officer at 2723 S. Norfolk Street, Apt #311, San Mateo, CA, leased by William Sharon.
13			
14	68	8/04/09	ALLEN FONG drove William Sharon and an Asian female to 5624 Stevens Creek Blvd, Cupertino, CA, and escorted the Asian female into Apt #354, leased by WAYLEN FONG.
15			
16	69	8/04/09	ALLEN FONG and William Sharon arrived together to renew the lease for the Enterprise brothel at 19608 Pruneridge Avenue, Apt # 8105, Cupertino, CA, leased by William Sharon.
17			
18	70	7/21/09	JIE MU cleaned 1624 Hope Drive, Apt #621, Santa Clara, CA, leased by WAYLEN FONG, and moved items out of that apartment.
19	71	7/21/09	JIE MU told leasing staff that she was cleaning and helping WAYLEN FONG move out of 1624 Hope Drive, Apt #621, Santa Clara, CA.
20			
21	72	7/21/09	JIE MU attempted to retrieve WAYLON FONG's mail for 1624 Hope Drive, Apt #621, Santa Clara, CA.
22			
23	73	7/21/09	JIE MU told leasing staff that WAYLEN FONG would come to the leasing office on "Friday" and retrieve his mail for 1624 Hope Drive, Apt #621, Santa Clara, CA.
24			
25	74	6/22/09	WAYLEN FONG submitted a notice of intent to vacate 1624 Hope Drive, Apt #621, Santa Clara, CA.
26	75	11/19/09	ALLEN FONG and William Sharon met with a leasing staff member for the purpose of renting 700 Agnew Road, Apt #210, Santa Clara, CA.
27			
28	76	11/20/09	ALLEN FONG provided a copy of William Sharon's driver's license to the leasing office for the rental of 700 Agnew Road, Apt #210, Santa Clara, CA.

1			
2	77	12/02/09	ALLEN FONG and William Sharon together entered 700 Agnew Road, Apt #210, Santa Clara, CA.
3	78	12/18/09	ALLEN FONG entered 20425 Via Pavisio, Apt #D-14, Cupertino, CA, leased by William Sharon, with a prostitute.
4			
5	79	12/19/09	Inside the brothel at 20425 Via Pavisio, Apt #D-14, Cupertino, CA, in a recorded conversation, ALLEN FONG told a prostitute how much money FONG needed to be paid from her prostitution earnings.
6			
7	80	2/22/10	An Enterprise prostitute sexually solicited an undercover police officer at 20425 Via Pavisio, Apt #D-14, Cupertino, CA, leased by William Sharon.
8	81	2/22/10	After an undercover officer was sexually solicited by an Enterprise prostitute at 20425 Via Pavisio, Apt #D-14, Cupertino, CA, another prostitute at that brothel, SJ, called "Jane" [JIE MU], who told SJ to standby and she would have "the boss" call her.
9			
10			
11	82	2/22/10	A few minutes after JIE MU told SJ that the "boss" would call her, ALLEN FONG called SJ and pressed for details about the police operation.
12			
13	83	3/11/10	Using his pick-up truck, ALLEN FONG and laborers moved items out of 700 Agnew Road, Apt #210, Santa Clara, CA, leased by William Sharon, and transported them to a Public Storage unit.
14			
15	84	6/28/10	ALLEN FONG made an ATM cash deposit of \$1,200.00 into the Bank of America account (ending 8321) held by LEOW WAN RU VERON.
16	85	7/07/10	ALLEN FONG made an ATM cash deposit of \$2,300.00 into the Bank of America account (ending 8321) held by LEOW WAN RU VERON.
17			
18	86	7/12/10	ALLEN FONG made an ATM cash deposit of \$1,000.00 into the Bank of America account (ending 8321) held by LEOW WAN RU VERON.
19			
20	87	7/17/10	ALLEN FONG made ATM cash deposits of \$1,700.00 and \$900.00, totaling \$2,600.00, into the Bank of America account (ending 8321) held by LEOW WAN RU VERON.
21			
22	88	7/19/10	ALLEN FONG made an ATM cash deposit of \$900.00 into the Bank of America account (ending 8321) held by LEOW WAN RU VERON.
23	89	8/17/10	ALLEN FONG exited 1030A Balboa Street, San Francisco, CA, with an Asian female, and transported the female to 2723 S. Norfolk Street, Apt #211, San Mateo, CA, leased by Alex Chan.
24			
25	90	8/17/10	ALLEN FONG entered the building of 744 Edgewater Blvd, Foster City, CA, where Apt #201 was leased by Alex Chan.
26			
27	91	9/03/10	ALLEN FONG drove an Asian female from 2723 S. Norfolk Street, Apt #211, San Mateo, CA, to 744 Edgewater Blvd, Foster City, CA.
28	92	9/03/10	ALLEN FONG exited 744 Edgewater Blvd, Foster City, CA, and escorted another Asian female, and carried her luggage, into his vehicle.

1			
2	93	9/03/10	ALLEN FONG drove the two Asian females to the Bank of America, where they made ATM transactions.
3	94	9/09/10	ALLEN FONG and Alex Chan together entered the building at 2715 S. Norfolk, San Mateo, CA, leased by Alex Chan.
4	95	9/09/10	ALLEN FONG moved items from 2723 S. Norfolk, Apt # 211, San Mateo, CA, leased by Alex Chan, to 2715 S. Norfolk Street, Apt # 111, San Mateo, CA, also leased by Alex Chan.
5	96	3/23/11	An Enterprise prostitute sexually solicited an undercover police officer at 2715 S. Norfolk Street, Apt #111, San Mateo, CA, leased by Alex Chan.
6	97	4/13/11	ALLEN FONG toured 1000 Foster City Blvd, Apt #4408, Foster City, CA, which was then leased by ROBERT CHUN beginning on 5/11/11.
7	98	9/28/11	ROBERT CHUN paid \$2,833.67 in rent for 7800 El Camino Real, Apt #122, Colma, CA, via a Citibank official check #311823166.
8	99	9/29/11	ROBERT CHUN opened the PG&E account for 7800 El Camino Real, Apt #122, Colma, CA.
9	100	12/13/11	An Enterprise prostitute sexually solicited an undercover police officer at 1000 Foster City Blvd, Apt #4408, Foster City, CA, leased by ROBERT CHUN.
10	101	1/24/12	KEVIN HARTIG opened the PG&E account for 1000 Foster City Blvd, Apt #2109, Foster City, CA.
11	102	1/28/12	KEVIN HARTIG paid \$3,005.48 in rent for 1000 Foster City Blvd, Apt #2109, Foster City, CA, from his Wells Fargo account (ending 2282).
12	103	2/2/12	ANGELINA CHUONG provided the leasing office with a deposit of \$473.65 for 2759 S. Norfolk Street, Apt #211, San Mateo, CA, from her Wells Fargo Bank account (ending 2741).
13	104	2/08/12	ANGELINA CHUONG submitted two money orders, totaling \$1,767.83, and signed by CHUONG, to the leasing office for rent payment for 2759 S. Norfolk Street, Apt #211, San Mateo, CA.
14	105	2/09/12	ANGELINA CHUONG opened the PG&E account for 2759 S. Norfolk Street, Apt #211, San Mateo, CA.
15	106	3/19/12	ANGELINA CHUONG leased 2401 Erin Place, South San Francisco, CA, to Enterprise members.
16	107	3/19/12	ANGELINA CHUONG gave ALLEN FONG the key to 2401 Erin Place, South San Francisco, CA.
17	108	8/08/12	KEVIN HARTIG opened the PG&E account for 2759 S. Norfolk Street, Apt #103, San Mateo, CA.
18	109	8/09/12	KEVIN HARTIG paid \$2,007.48 in rent for 2759 S. Norfolk Street, Apt #103, San Mateo, CA, from his Wells Fargo account (ending 2282).

1			
2	110	10/04/12	KEVIN HARTIG opened the PG&E account for 1175 Park Place, Apt #103, San Mateo, CA.
3	111	10/04/12	KEVIN HARTIG paid \$2,648.26 in rent for 1175 Park Place, Apt #103, San Mateo, CA, from his Wells Fargo account (ending 2282).
4	112	10/16/12	An Enterprise prostitute sexually solicited an undercover police officer at 2759 S. Norfolk Street, Apt #103, San Mateo, CA, leased by KEVIN HARTIG.
5	113	4/10/13	ALLEN FONG entered 2187 Vista Del Mar, San Mateo, CA, leased by KEVIN HARTIG and unnamed CC #2.
6	114	4/10/13	ALLEN FONG escorted an Asian female from 2759 S. Norfolk Street, Apt #103, San Mateo, CA, leased by KEVIN HARTIG, and carried her luggage, into his vehicle.
7	115	4/10/13	ALLEN FONG drove an Asian female from 2759 S. Norfolk Street, Apt #103, San Mateo, CA, to 1341 David Street, San Mateo, CA, where Apt #107 was leased by ALLEN FONG.
8	116	5/3/13	ALLEN FONG delivered supplies to 2759 S. Norfolk Street, Apt #103, San Mateo, CA, leased by KEVIN HARTIG.
9	117	5/3/13	ALLEN FONG delivered supplies to 1341 David Street, Apt #107, San Mateo, CA, leased by ALLEN FONG.
10	118	8/12/13	During the execution of a federal search warrant at 1341 David Street, Apt #107, San Mateo, CA, leased by ALLEN FONG, YA HUAI HUNG and another Enterprise prostitute were present inside that brothel.
11	119	8/12/13	ALLEN FONG possessed approximately 1,088 condoms inside his vehicle.
12	120	8/12/13	ALLEN FONG possessed approximately eleven bank cards, including the Bank of America bank card (ending 0914) issued from the Bank of America account (ending 77382) opened in the name of Sakura Susa.
13	121	10/03/13	CHONTHICHA JAEMRATANASOPHIN sent an outgoing international wire transfer for \$7,000.00 to her bank account in Singapore.
14	122	11/22/13	CHONTHICHA JAEMRATANASOPHIN and another prostitute were present inside the Enterprise brothel at 3 Plaza View Lane, Apt #309, Foster City, CA, leased by ALLEN FONG, during an undercover law enforcement operation.
15	123	1/22/14	ALLEN FONG and CHONTHICHA JAEMRATANASOPHIN, posing as a couple, went together to a leasing office, where ALLEN FONG rented 2719 S. Norfolk Street, Apt #311, San Mateo, CA.

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

1 COUNT TWO: (18 U.S.C. §§ 371 and 1952(a)(3) – Conspiracy to Use Interstate and Foreign
2 Commerce in Aid of Racketeering Enterprise)

3 8. The factual allegations contained in paragraphs one through four and seven are realleged
4 and incorporated by reference as though fully set forth herein.

5 9. Beginning from at least October 24, 2006, and continuing to at least November 22, 2013,
6 2014, in the Northern District of California and elsewhere, the defendants,

7 ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
8 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
9 "Jeff Woo"),

10 LEOW WAN RU VERON (a/k/a "Brisa"),

11 ROBERT CHUN,

12 JIE MU (a/k/a "Jane"),

13 LAURENCE SHU KWAN LEE, and

14 YA HUAI HUNG,

15 knowingly conspired with each other, and with other persons known and unknown to the grand jury, to
16 travel in interstate and foreign commerce, and use the mail and a facility in interstate commerce,
17 namely, the telephone, the Internet, the United Parcel Service ("UPS"), and the United States Postal
18 Service ("USPS"), with the intent to promote, manage, establish, carry on, and facilitate the promotion,
19 management, establishment and carrying on of an unlawful activity, that is, a business enterprise
20 involving prostitution offenses in violation of the laws of the State in which they are committed and of
21 the United States described in paragraph five above, and thereafter did perform an act to promote,
22 manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying
23 on of such unlawful activity, to wit: Internet purchases of condoms, delivery of condoms across state
24 lines by UPS and USPS, posting of prostitution advertisements online, answering calls for telephone
25 numbers posted on the online advertisements, and making telephone calls for the purpose of
26 coordinating sexual activity between prostitutes and customers in exchange for money.

27 10. In furtherance of the conspiracy and to accomplish the object of the conspiracy, the
28 defendants and their co-conspirators, and others known and unknown to the Grand Jury, committed the
following overt acts, among others, in the Northern District of California and elsewhere, on or about the

1 dates set forth below:

Overt Acts	Approximate Date	
1	10/24/06	LEOW WAN RU VERON ("BRISA") entered the United States at the San Francisco International Airport ("SFO") from Singapore.
2	10/26/06	Two days after LEOW WAN RU VERON entered the United States on 10/24/06, ROBERT CHUN made an online Craigslist posting (#226080485) of a prostitution advertisement for a Singaporean female named "Veron" entitled "Sexy Singaporeans or Busty YoYo."
3	10/30/06	ROBERT CHUN made an online Craigslist posting (#228061711) of a prostitution advertisement for a Singaporean female named "Veron."
4	11/04/06	ROBERT CHUN made an online Craigslist posting (#230165966) of a prostitution advertisement for a Singaporean female named "Veron."
5	11/09/06	ROBERT CHUN made an online Craigslist posting (#232455818) of a prostitution advertisement for a Singaporean female named "Brisa."
6	11/13/06	ROBERT CHUN made an online Craigslist posting (#234502112) of a prostitution advertisement for a Singaporean female named "Brisa."
7	11/18/06	ROBERT CHUN made an online Craigslist posting (#236883950) of a prostitution advertisement for a Singaporean female named "Brisa."
8	11/23/06	ROBERT CHUN made an online Craigslist posting (#238990139) of a prostitution advertisement for a Singaporean female named "Brisa."
9	11/28/06	ROBERT CHUN made an online Craigslist posting (#241148836) of a prostitution advertisement for a Singaporean female named "Brisa."
10	12/03/06	ROBERT CHUN made an online Craigslist posting (#243577115) of a prostitution advertisement for a Singaporean female named "Brisa."
11	12/07/06	ROBERT CHUN made an online Craigslist posting (#245768302) of a prostitution advertisement for a Singaporean female named "Brisa."
12	12/12/06	ROBERT CHUN made an online Craigslist posting (#248147040) of a prostitution advertisement for a Singaporean female named "Brisa."
13	12/13/06	ROBERT CHUN made an online Craigslist posting (#248759947) of a prostitution advertisement for a Singaporean female named

		"Brisa."
14	12/17/06	ROBERT CHUN made an online Craigslist posting (#250395936) of a prostitution advertisement for a Singaporean female named "Brisa."
15	1/22/07	LEOW WAN RU VERON departed the United States from SFO to Singapore.
16	4/19/07	LEOW WAN RU VERON entered the United States at SFO from Singapore.
17	4/19/07	On her I-94 immigration entry document ("I-94"), LEOW WAN RU VERON listed the Enterprise brothel at 3144 La Selva Circle, Apt #6, San Mateo, CA, leased by Allen Fong & unnamed CC #1, as the location where she would be staying while in the United States.
18	7/17/07	LEOW WAN RU VERON departed the United States from SFO to Singapore.
19	10/29/07	Based upon flight reservations made by LEOW WAN RU VERON, co-conspirators VK and SHG entered the United States on the same flight from Singapore (through Taipei) to the San Francisco International Airport.
20	10/29/07	On her I-94, co-conspirator VK listed 3144 La Selva Circle, San Mateo, CA, leased by ALLEN FONG & unnamed CC #1, as the location where she would be staying while in the United States.
21	10/29/07	On her I-94, co-conspirator SHG listed 3144 La Selva Circle, San Mateo, CA, leased by ALLEN FONG & unnamed CC #1, as the location where she would be staying while in the United States.
22	11/05/07	Based upon flight reservations made by LEOW WAN RU VERON, two Asian women and LEOW WAN RU VERON entered the United States on the same flight from Singapore (through Taipei) to the Los Angeles International Airport ("LAX").
23	11/05/07	From LAX, LEOW WAN RU VERON and two Asian women who took the same flight from Singapore to LAX on 11/05/07 also took the same flight from Burbank, CA, to Oakland, CA, on 11/05/07 based upon domestic airline tickets purchased by ALLEN FONG on 11/04/07 via his UCB/East West Bank account (ending 8930).
24	2/02/08	LEOW WAN RU VERON departed the United States from SFO to Singapore.
25	2/20/08	ROBERT CHUN made an online Craigslist posting (#579810942) of a prostitution advertisement for "Mina," which was used by a "John" to arrange for sexual services at the Enterprise brothel on 1315 Palos Verdes Dr, Apt # 101, San Mateo, CA, leased by William Sharon, on 2/20/08.
26	5/13/08	ALLEN FONG made an Internet purchase of 1,000 condoms from Go Live, Inc. located in Florida, and the condoms were shipped via

		United Parcel Service to the San Francisco Residence.
27	5/27/08	LEOW WAN RU VERON entered the United States at SFO from Singapore.
28	6/12/08	ALLEN FONG made an Internet purchase of 2,000 condoms from Okamoto USA, Inc. located in Connecticut, and the condoms were shipped via Federal Express to the San Francisco residence.
29	10/10/08	ALLEN FONG made an Internet purchase of 2,000 condoms from Go Live, Inc. located in Florida, and the condoms were shipped via United Parcel Service to the San Francisco Residence.
30	11/11/08	ALLEN FONG made an Internet purchase of 6,000 condoms from Go Live, Inc. located in Florida, and the condoms were shipped via United Parcel Service to the San Francisco Residence.
31	12/20/08	LEOW WAN RU VERON departed the United States from SFO to Singapore.
32	2/11/09	LAURENCE LEE made an online Craigslist posting (#1031226572) of a prostitution advertisement for "Nora," which was used by an undercover officer to arrange for sexual services on 2/13/09 at the Enterprise brothel on 337 S. Fremont St, Apt #119, San Mateo, CA, leased by William Sharon.
33	2/13/09	JIE MU was the telephone operator who arranged prostitution services for an undercover officer on 2/13/09 at the Enterprise brothel located on 337 S. Fremont St, Apt #119, San Mateo, CA, leased by William Sharon.
34	4/22/09	LEOW WAN RU VERON entered the United States at SFO from Singapore.
35	4/22/09	On her I-94, LEOW WAN RU VERON listed 1030A Balboa St, San Francisco, CA, which was YA HUAI HUNG's residence owned by ALLEN FONG, as the location where she would be staying while in the United States.
36	4/23/09	JIE MU was the telephone operator who arranged prostitution services for an UC officer on 4/23/09 at the Enterprise brothel located on 2723 S. Norfolk St, Apt #311, San Mateo, CA, leased by William Sharon.
37	4/23/09	LAURENCE LEE made an online Craigslist posting (#1136671465) of a prostitution advertisement for "Luisa," which was used by an undercover officer to arrange for sexual services on 4/23/09 at the Enterprise brothel on 2723 S. Norfolk St, Apt #311, San Mateo, CA, leased by William Sharon.
38	6/11/09	ALLEN FONG made an Internet purchase of 6,000 condoms from Go Live, Inc. located in Florida, and the condoms were shipped via United Parcel Service to the San Francisco residence.
39	7/18/09	LEOW WAN RU VERON departed the United States from SFO to

1		Singapore.	
2	40	9/15/09	JIE MU was the telephone operator who arranged prostitution services for a "John" at 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA, leased by WAYLEN FONG.
3			
4	41	9/15/09	JIE MU was the telephone operator who arranged prostitution services for a second "John" at 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA, leased by WAYLEN FONG.
5			
6	42	9/15/09	JIE MU was the telephone operator who arranged prostitution services for a third "John" at 19608 Pruneridge Ave, Apt #8105, Cupertino, CA, leased by William Sharon.
7			
8	43	9/15/09	LAURENCE LEE made an online Craigslist posting (#1375728560) of a prostitution advertisement for "Lisa," which was used by a "John" on 9/15/09 to arrange for sexual services at the Enterprise brothel on 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA, leased by WAYLEN FONG.
9			
10			
11	44	9/15/09	LAURENCE LEE made an online MyRedbook.com posting (#178449) of a prostitution advertisement for "Tina," which was used on 9/15/09 by a different "John" to arrange for sexual services at the Enterprise brothel on 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA, leased by WAYLEN FONG.
12			
13			
14	45	9/22/09	JIE MU was the telephone operator who arranged prostitution services for an undercover officer on 9/22/09 at the Enterprise brothel located on 19608 Pruneridge Ave, Apt #8105, Cupertino, CA, leased by William Sharon.
15			
16			
17	46	9/22/09	JIE MU was the telephone operator who arranged prostitution services for a fourth "John" at 19608 Pruneridge Ave, Apt #8105, Cupertino, CA, on 9/22/09.
18			
19	47	2/22/10	JIE MU was the telephone operator who arranged prostitution services for an undercover officer on 2/22/10 at the Enterprise brothel located on 20425 Via Pavisio, Apt # D-14, Cupertino, CA, leased by William Sharon.
20			
21	48	2/22/10	An Enterprise member made an online MyRedbook.com posting (#144120) of a prostitution advertisement for "Kate," which was used by an undercover officer on 2/22/10 to arrange for sexual services at the Enterprise brothel on 20425 Via Pavisio, Apt # D-14, Cupertino, CA, leased by William Sharon.
22			
23			
24	49	5/05/10	LEOW WAN RU VERON entered the United States at SFO from Singapore.
25			
26	50	5/27/10	ALLEN FONG made an Internet purchase of 5,040 condoms from Go Live, Inc. located in Florida, and the condoms were shipped via United States Postal Service to the residence of YA HUAI HUNG in San Francisco, CA.
27			
28	51	8/02/10	LEOW WAN RU VERON departed the United States from SFO to

		Singapore.
52	2/15/11	ALLEN FONG made an Internet purchase of 2,000 condoms from Go Live, Inc. located in Florida, and the condoms were shipped via United Parcel Service to the residence of YA HUAI HUNG in San Francisco, CA.
53	8/02/11	ALLEN FONG made Internet purchase of 3,124 condoms from Go Live, Inc. located in Florida, and the condoms were shipped via United Parcel Service to 1030A Balboa Street, San Francisco, CA.
54	7/03/12	An Enterprise member posted a prostitution advertisement (#377258) for sex with "Mika" on MyRedbook.com.
55	7/03/12	An Enterprise member posted a prostitution advertisement (#378653) for sex with "Mika" on MyRedbook.com.
56	8/25/12	Using Visa credit card (ending 0914) issued from a Bank of America account (ending 77382) opened in Sakura Susa's name, ALLEN FONG made an Internet purchase of 2,000 condoms from Global Protection Corp. located in Massachusetts, and the condoms were shipped via United Parcel Service to 2401 Erin Place, South San Francisco, CA.
57	3/12/13	Using Visa credit card (ending 0914), ALLEN FONG made an Internet purchase of 2,000 condoms from Global Protection Corp. located in Massachusetts, and the condoms were shipped via United Parcel Service to "YA HUAI HUNG" at 1030A Balboa Street, San Francisco, CA.
58	9/25/13	Using Visa credit card (ending 0564), ALLEN FONG made an Internet purchase of 3,000 condoms from Global Protection Corp. located in Massachusetts, with the billing contact as "Sakura Susa" at 1030A Balboa Street, San Francisco, CA.
59	11/21/13	An Enterprise member posted a prostitution advertisement (#582161) for sex with "Nana" on MyRedbook.com.
60	11/22/13	An Enterprise member posted a prostitution advertisement (#559330) for sex with "Nana" on MyRedbook.com.

All in violation of Title 18, United States Code, Section 371 and 1952(a)(3).

COUNTS THREE THROUGH SEVEN: (18 U.S.C. §§ 1952(a)(3) and 2 – Use of Interstate Commerce in Aid of Racketeering Enterprise)

11. The factual allegations contained in paragraphs one through four and seven are realleged and incorporated by reference as though fully set forth herein.

12. On or about the dates listed below, in the Northern District of California and elsewhere, the defendant,

Indictment

1 ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
2 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
"Jeff Woo"),

3 knowingly used the mail and a facility in interstate commerce, namely, the telephone, with the intent to
4 promote, manage, establish, carry on, and facilitate the promotion, management, establishment and
5 carrying on of an unlawful activity, that is, a business enterprise involving prostitution offenses in
6 violation of the laws of the State in which they are committed and of the United States described in
7 paragraph five, and thereafter did perform an act to promote, manage, establish and carry on, and to
8 facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit:
9 use of telephones to arrange sexual activity between prostitutes and customers in exchange for money,
10 as set forth below:

Count	Approximate Date	Telephone No.	Account Provider for Telephone No.	Billing Contact for Account	Use of Telephone Number
3	2/22/10	(408) 731-9034	Telusion, Inc. d/b/a TossableDigits.com	Lily Go Asswe123@gmail.com Acct # 6330	UC officer arranged appointment with prostitute at 20425 Via Pavisio, Apt # D-14, Cupertino, CA, by calling (408) 731-9034.
4	3/23/11	(650) 241-3583	Phone.com	Allen Fong, 1030A Balboa St, San Francisco, CA 94118 (650) 630-1528 may1bobo@hotmail.com	UC officer arranged appointment with prostitute at 2715 S. Norfolk Street, Apt #111, San Mateo, CA, by calling (650) 241-3583.
5	12/13/11	(650) 241-3583	Phone.com	Allen Fong, 1030A Balboa St, San Francisco, CA 94118 (650) 630-1528 may1bobo@hotmail.com	UC officer arranged appointment with prostitute at 1000 Foster City Blvd, Apt # 4408, Foster City, CA, by calling (650) 241-3583.
6	10/16/12	(650) 264-7568	Phone.com	Steve Fujimoto, 512 22 nd Ave, San Francisco, CA 94118 (650) 630-1528 may1bobo@hotmail.com	UC officer arranged appointment with prostitute at 2759 S. Norfolk Street, Apt #103, San Mateo, CA, by calling (650) 264-7568.
7	11/21/13	(408) 643-1217	AT&T Wireless	William F. Sharon 1624 Hope Dr, Santa Clara, CA (650) 483-5756 may1bobo@hotmail.com	UC officer arranged appointment with prostitute at 3 Plaza View Lane, Apt # 309, Foster City, CA, by calling (408) 643-1217.

1 All in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

2 COUNTS EIGHT THROUGH THIRTEEN: (18 U.S.C. §§ 1952(a)(3) and 2 – Use of Interstate
3 Commerce in Aid of Racketeering Enterprise)

4 13. The factual allegations contained in paragraphs one through four and seven are realleged
5 and incorporated by reference as though fully set forth herein.

6 14. On or about the dates listed below, in the Northern District of California and elsewhere,
7 the defendant,

8 ALLEN FONG (a/k/a “Steve Nguyen,” a/k/a “Steve Fujimoto,” a/k/a “John Fujimoto,”
9 a/k/a “David Lee,” a/k/a “May Lee,” a/k/a “Sakura Susa,” a/k/a “Jeff Law,” and a/k/a
10 “Jeff Woo”),

11 knowingly used the mail and a facility in interstate commerce, namely, the Internet, with the intent to
12 promote, manage, establish, carry on, and facilitate the promotion, management, establishment and
13 carrying on of an unlawful activity, that is, a business enterprise involving prostitution offenses in
14 violation of the laws of the State in which they are committed and of the United States described in
15 paragraph five, and thereafter did perform an act to promote, manage, establish and carry on, and to
16 facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit:
17 the defendant made Internet postings of prostitution advertisements, as set forth below:

Count	Approximate Date Prostitution Advertisement (“Ad”) Posted on Internet	MyRedbook.com Ad Posting No.	Names Used to Post Ads	AT&T Unique IP Address Used to Post Ads	Name and Address of AT&T Customer Assigned Unique IP Address	Phone No. Linked to Ad Posting & Contact/Subscriber
8	3/23/11	# 210337 for sex with “Pamela”	“springfling” captured IP address 76.220.54.254	76.220.54.254	Allen Fong with his listed residential address in San Mateo	(650) 241-3583 Phone.com Allen Fong 1030A Balboa Street, San Francisco, CA (650) 630-1528 may1bobo@hotmail.com
9	12/13/11	# 285615 for sex with “Cookie”	“violeteyes” captured IP address 76.220.54.254	76.220.54.254	Allen Fong with his listed residential address in San Mateo	(650) 241-3583 Phone.com Allen Fong 1030A Balboa Street, San Francisco, CA (650) 630-1528

						maylbobo@hotmail.com
10	7/03/12	# 178017 for sex with "Mika"	"discrete_lover" captured IP address 76.220.54.254	76.220.54.254	Allen Fong with his listed residential address in San Mateo	(650) 241-3583 Phone.com Allen Fong 1030A Balboa Street, San Francisco, CA (650) 630-1528 maylbobo@hotmail.com
11	10/16/12	# 414190 for sex with "Yuki"	"asianlust88" captured IP address 76.220.54.254	76.220.54.254	Allen Fong with his listed residential address in San Mateo	(650) 264-7568 Phone.com "Steve Fujimoto" (650) 630-1528 maylbobo@hotmail.com
12	11/21/13	# 582161 for sex with "Nana"	"zen-vision" captured IP address 76.220.54.254	76.220.54.254	Allen Fong with his listed residential address in San Mateo	(408) 643-1217 AT&T William F. Sharon 1624 Hope Dr, Santa Clara, CA (650) 483-5756 maylbobo@hotmail.com
13	11/22/13	# 559330 for sex with "Nana"	"asianxtacy" captured IP address 76.220.54.254	76.220.54.254	Allen Fong with his listed residential address in San Mateo	(408) 643-1217 AT&T William F. Sharon 1624 Hope Dr, Santa Clara, CA (650) 483-5756 maylbobo@hotmail.com

All in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNT FOURTEEN: (18 U.S.C. §§ 1956(h) & 1956(a)(1)(A)(i) – Conspiracy to Launder Monetary Instruments)

15. The factual allegations contained in paragraphs one through four and seven are realleged and incorporated by reference as though fully set forth herein.

16. Beginning from at least August 2002, and continuing to at least July 29, 2014, in the Northern District of California and elsewhere, the defendants,

ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto," a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a "Jeff Woo"),

YA HUAI HUNG,

WAYLEN FONG,

1 KEVIN HARTIG,
 2 ROBERT CHUN, and
 3 ANGELINA CHUONG,
 4

5 knowingly conspired with each other, and with other persons known and unknown to the grand jury, to
 6 conduct and attempt to conduct financial transactions representing the proceeds of unlawful activity, to
 7 wit: prostitution, knowing that the property involved in the financial transactions represented the
 8 proceeds of unlawful activity, with the intent to promote the carrying on of a specified unlawful activity,
 9 to wit: Use of Interstate Commerce in Aid of Racketeering Enterprise, in violation of 18 U.S.C. § 1952;
 10 Transportation for Prostitution, in violation of 18 U.S.C. § 2421; and Importation of Alien for Immoral
 11 Purpose, in violation of 8 U.S.C. § 1328.

12 17. In furtherance of the conspiracy and to accomplish the objects of the conspiracy, the
 13 defendants and their co-conspirators, and others known and unknown to the Grand Jury, committed the
 14 following overt acts, among others, in the Northern District of California and elsewhere, involving rent
 15 and utility payments for Enterprise's brothels on or about the dates set forth below:

Overt Act	Date of Financial Transaction	Amount	Purpose of Transaction	Method of Payment	Account Holder(s) or Remitter	Nominee Lessee of Apartment Used as Brothel
1	11/30/08	\$99.00	Deposit for 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA	Safeway Money Order #68079718399	Waylen Fong	Waylen Fong
2	3/23/09	\$239.00	Security Deposit (\$199) plus Application Fee (\$40) for 1624 Hope Drive, Apt #621, Santa Clara, CA	Online Payment	Waylen Fong	Waylen Fong
3	3/23/09	\$2,304.52	Rent payment for 1624 Hope Drive, Apt #621, Santa Clara, CA	Washington Mutual Bank Money Orders #1092402234, #1092402235, & #1092402236	Waylen Fong	Waylen Fong
4	6/02/09	\$1,000.00	Rent payment for 5624 Stevens Creek Blvd, Apt #354,	Washington Mutual Money Order #1092402524	Waylen Fong	Waylen Fong

			Cupertino, CA			
5	10/02/09	\$288.93	PG&E payment for 19608 Pruneridge Ave, Apt #8105, Cupertino, CA	UCB account (ending 9185)	Allen Fong & William Sharon	William Sharon
6	10/02/09	\$222.09	PG&E payment for 20425 Via Pavisio, Apt #D-14, Cupertino, CA	UCB account (ending 9185)	Allen Fong & William Sharon	William Sharon
7	11/16/09	\$ 173.75	PG&E payment for 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Waylen Fong
8	1/06/10	\$2,047.37	Rent payment for 700 Agnew Rd, Apt #210, Santa Clara, CA	UCB account (ending 9185)	Allen Fong & William Sharon	William Sharon
9	2/03/10	\$2,100.00	Rent payment for 20425 Via Pavisio, Apt #D-14, Cupertino, CA	UCB account (ending 9185)	Allen Fong & William Sharon	William Sharon
10	2/05/10	\$2,073.56	Rent payment for 700 Agnew Road, Apt #210, Santa Clara, CA	UCB account (ending 9185)	Allen Fong & William Sharon	William Sharon
11	7/08/10	\$1,924.00	Rent payment for 744 Edgewater Blvd, Apt #201, Foster City, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Alex Chan
12	11/23/10	\$306.38	PG&E payment for 2715 S. Norfolk St, Apt #111, San Mateo, CA	Bank of America account (ending 77382)	Sakura Susa	Alex Chan
13	7/08/11	\$ 116.62	PG&E payment for 1000 Foster City, Apt #4408, Foster City, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Robert Chun
14	8/01/11	\$2,350.17	Rent payment for 853 Commodore Dr., Apt #464, San Bruno, CA	Bank of America account (ending 77382)	Sakura Susa	William Sharon
15	9/28/11	\$2,833.67	Rent Payment for 7800 El Camino Real, Apt #122, Colma, CA	Citibank Official Check #311823166	Robert Chun	Robert Chun

1	16	1/25/12	\$107.50	PG&E payment for 7800 El Camino Real, Apt #122, Colma, CA	Bank of America account (ending 77382)	Sakura Susa	Robert Chun
2	17	1/25/12	\$252.44	PG&E payment for 2715 S. Norfolk St, Apt #111, San Mateo, CA	Bank of America account (ending 77382)	Sakura Susa	Alex Chan
3	18	2/02/12	\$ 473.65	Deposit for 2759 S. Norfolk St, Apt #211, San Mateo, CA	Check # 1036 from Wells Fargo account (ending 2741) held by Angelina Chuong	Angelina Chuong	Angelina Chuong
4	19	2/08/12	\$1,767.83	Rent Payment for 2759 S. Norfolk St, Apt #211, San Mateo, CA	U.S. Postal Service Money Orders (#19422006930 & 19422006941)	Angelina Chuong	Angelina Chuong
5	20	4/12/12	\$ 65.72	PG&E payment for 2759 S. Norfolk St, Apt #211, San Mateo, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Angelina Chuong
6	21	7/06/12	\$2,169.00	Rent payment for 2759 S. Norfolk St, Apt #211, San Mateo, CA	Bank of America account (ending 77382)	Sakura Susa	Angelina Chuong
7	22	8/09/12	\$2,007.48	Rent payment for 2759 S. Norfolk St, Apt #103, San Mateo, CA	Wells Fargo account (ending 2282)	Kevin Hartig	Kevin Hartig
8	23	8/31/12	\$2,607.42	Rent payment for 1000 Foster City, Apt #2109, Foster City, CA	Wells Fargo account (ending 2282)	Kevin Hartig	Kevin Hartig
9	24	10/26/12	\$ 50.00	PG&E payment for 2759 S. Norfolk St, Apt # 103, San Mateo, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Kevin Hartig
10	25	1/28/13	\$ 275.66	PG&E payment for 2759 S. Norfolk St, Apt #103, San Mateo, CA	JPMC account (ending 04425)	Allen Fong & Ya Huai Hung	Kevin Hartig
11	26	1/29/13	\$3,068.09	Rent payment for 1175 Park Place, Apt #103, San Mateo, CA	Wells Fargo account (ending 2282)	Kevin Hartig	Kevin Hartig

27	4/03/13	\$2,759.00	Rent payment for 700 Agnew Road, Apt #134, Santa Clara, CA	Bank of America account (ending 8519)	Allen Fong	Allen Fong
28	6/04/13	\$ 600.00	Deposit for 3 Plaza View Lane, Apt #309, Foster City, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Allen Fong

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

COUNTS FIFTEEN THROUGH TWENTY-THREE: (18 U.S.C. §§ 1956(a)(1)(A)(i) and 2 – Laundering of Monetary Instruments)

18. The factual allegations contained in paragraphs one through four and seven are realleged and incorporated by reference as though fully set forth herein.

19. On or about the dates listed below, in the Northern District of California and elsewhere, the defendant,

ALLEN FONG (a/k/a “Steve Nguyen,” a/k/a “Steve Fujimoto,” a/k/a “John Fujimoto,” a/k/a “David Lee,” a/k/a “May Lee,” a/k/a “Sakura Susa,” a/k/a “Jeff Law,” and a/k/a “Jeff Woo”),

knowingly conducted, and attempted to conduct, financial transactions representing the proceeds of unlawful activity, to wit: prostitution, knowing that the property involved in the financial transactions represented the proceeds of unlawful activity, with the intent to promote the carrying on of a specified unlawful activity, to wit: Use of Interstate Commerce in Aid of Racketeering Enterprise, in violation of 18 U.S.C. § 1952; Transportation for Prostitution, in violation of 18 U.S.C. § 2421; and Importation of Alien for Immoral Purpose, in violation of 8 U.S.C. § 1328.

Count	Date of Financial Transaction	Amount	Purpose of Transaction	Method of Payment	Account Holder(s) or Remitter	Nominee Lessee of Apartment Used as Brothel
15	11/16/09	\$ 173.75	PG&E payment for 5624 Stevens Creek Blvd, Apt #354, Cupertino, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Waylen Fong
16	7/08/10	\$1,924.00	Rent payment for 744 Edgewater Blvd, Apt #201, Foster City, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Alex Chan
17	10/15/10	\$240.72	Fees for 853 Commodore Dr., Apt #464, San Bruno, CA	UCB/East West Bank account (ending 8930)	Allen Fong	William Sharon

18	4/06/12	\$ 946.70	Rent payment for 1000 Foster City, Apt #4408, Foster City, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Robert Chun
19	4/12/12	\$ 65.72	PG&E payment for 2759 S. Norfolk St, Apt #211, San Mateo, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Angelina Chuong
20	3/19/13	\$642.00	Fees for 700 Agnew Road, Apt #134, Santa Clara, CA	Bank of America account (ending 8519)	Allen Fong	Allen Fong
21	3/21/13	\$1,068.00	Rent payment for 700 Agnew Road, Apt #134, Santa Clara, CA	Bank of America account (ending 8519)	Allen Fong	Allen Fong
22	4/03/13	\$2,759.00	Rent payment for 700 Agnew Road, Apt #134, Santa Clara, CA	Bank of America account (ending 8519)	Allen Fong	Allen Fong
23	6/04/13	\$ 600.00	Deposit for 3 Plaza View Lane, Apt #309, Foster City, CA	UCB/East West Bank account (ending 8930)	Allen Fong	Allen Fong

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

COUNT TWENTY-FOUR: (18 U.S.C. §§ 1956(h) & 1956(a)(2)(A) – Conspiracy to Transport Funds to Promote Unlawful Activity)

20. The factual allegations contained in paragraphs one through four and seven are realleged and incorporated by reference as though fully set forth herein.

21. Beginning from at least March 4, 2004, and continuing to at least October 3, 2013, in the Northern District of California and elsewhere, the defendants,

ALLEN FONG (a/k/a “Steve Nguyen,” a/k/a “Steve Fujimoto,” a/k/a “John Fujimoto,” a/k/a “David Lee,” a/k/a “May Lee,” a/k/a “Sakura Susa,” a/k/a “Jeff Law,” and a/k/a “Jeff Woo”),

YA HUAI HUNG,

LEOW WAN RU VERON (a/k/a “Brisa”),

CHONTHICHA JAEMRATANASOPHIN (a/k/a “Nana”), and

JIE MU (a/k/a “Jane”),

knowingly conspired with each other, and with other persons known and unknown to the grand jury, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument

1 and funds from the United States to and through a place outside the United States, with the intent to
 2 promote the carrying on of a specified unlawful activity, to wit: Use of Interstate and Foreign Commerce
 3 in Aid of Racketeering Enterprise, in violation of 18 U.S.C. § 1952; Transportation for Prostitution, in
 4 violation of 18 U.S.C. § 2421; and Importation of Alien for Immoral Purpose, in violation of 8 U.S.C.
 5 § 1328.

6 22. In furtherance of the conspiracy and to accomplish the object of the conspiracy, the
 7 defendants and their co-conspirators, and others known and unknown to the Grand Jury, committed the
 8 following overt acts, among others, in the Northern District of California and elsewhere, involving
 9 international wire transfers sent by Enterprise members from the United States to foreign countries,
 10 including to known Enterprise members and prostitutes on or about the dates set forth below:

Overt Act	Date of Wire Transfer sent from the United States	Amount of Wire Transfer	Method of Payment	Account Holder(s) or Issuer	Receiving Location Outside the United States	Beneficiary
1	7/02/06	\$2,000.00	Western Union	Allen Fong	Canada	Jie Mu
2	3/09/07	\$1,000.00	Zenvision Bank of America account (ending 40008)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
3	5/03/07	\$8,000.00	Cathay Bank account (ending 5745)	Allen Fong	Singapore	Leow Wan Ru Veron
4	5/22/07	\$9,000.00	Cathay Bank account (ending 5745)	Allen Fong	Singapore	Leow Wan Ru Veron
5	9/04/07	\$3,810.00	Zenvision Bank of America account (ending 40008)	Allen Fong & Ya Huai Hung	Singapore	SWO
6	9/18/07	\$5,000.00	UCB/East West account (ending 8930)	Allen Fong	Singapore	Leow Wan Ru Veron
7	10/10/07	\$6,500.00	UCB/East West account (ending 8930)	Allen Fong	Singapore	Leow Wan Ru Veron
8	12/07/07	\$6,000.00	UCB account (ending 9185)	Allen Fong & William Sharon	Singapore	Leow Wan Ru Veron
10	1/25/08	\$18,000.00	UCB account (ending 9185)	Allen Fong & William Sharon	Singapore	Leow Wan Ru Veron
11	2/22/08	\$14,308.00	UCB account (ending 9185)	Allen Fong & William Sharon	Singapore	Leow Wan Ru Veron
12	5/22/08	\$6,000.00	UCB account (ending 9185)	Allen Fong & William Sharon	Singapore	Leow Wan Ru Veron
13	6/30/08	\$2,000.00	Bank of America account (ending	Jie Mu	Singapore	SWO

			66425)			
14	7/14/08	\$6,600.00	UCB/East West account (ending 8930)	Allen Fong	Singapore	SBH
15	7/30/08	\$5,600.00	Zenvision Bank of America account (ending 40008)	Allen Fong & Ya Huai Hung	Singapore	ELG
16	7/31/08	\$8,000.00	Citibank account (ending 7310)	Alex Chan	Singapore	Leow Wan Ru Veron
17	8/29/08	\$6,600.00	UCB account (ending 9185)	Allen Fong & William Sharon	Singapore	SBH
18	9/9/08	\$3,500.00	Zenvision Bank of America account (ending 40008)	Allen Fong & Ya Huai Hung	Singapore	ELG
19	10/15/08	\$9,900.00	Bank of America account (ending 68419)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
20	10/24/08	\$4,000.00	Zenvision Bank of America account (ending 40008)	Allen Fong & Ya Huai Hung	Singapore	NBH
21	3/20/09	\$2,500.00	JPMC account (ending 0442-5)	Allen Fong & Ya Huai Hung	Singapore	NBH
22	6/22/09	\$9,500.00	JPMC account (ending 7464)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
23	7/09/09	\$9,500.00	JPMC account (ending 7464)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
24	7/13/09	\$9,000.00	Bank of America account (ending 68419)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
25	8/18/09	\$1,500.00	JPMC account (ending 0442-5)	Allen Fong & Ya Huai Hung	Singapore	NBH
26	9/08/09	\$2,000.00	JPMC account (ending 0442-5)	Allen Fong & Ya Huai Hung	Singapore	NBH
27	10/26/09	\$2,610.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
28	2/02/10	\$1,800.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	NBH
29	2/13/10	\$1,700.00	Western Union	Allen Fong	Singapore	SBH
30	2/18/10	\$4,500.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
31	6/03/10	\$9,000.00	JPMC account (ending 7464)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
32	7/13/10	\$9,900.00	Bank of America account (ending 68419)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
33	10/26/10	\$2,500.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
34	1/25/11	\$4,000.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
35	6/30/11	\$9,000.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
36	12/05/11	\$5,000.00	JPMC account (ending 5066)	Chonthicha Jaemratanasophin	Singapore	Chonthicha Jaemratanasophin
37	1/17/12	\$4,800.00	JPMC account (ending 5066)	Chonthicha Jaemratanasophin	Singapore	Chonthicha Jaemratanasophin
38	8/06/12	\$2,500.00	JPMC account (ending 40442-5)	Chonthicha Jaemratanasophin	Singapore	Chonthicha Jaemratanasophin

39	3/05/13	\$9,000.00	JPMC account (ending 40442-5)	Chonthicha Jaemratanasophon	Thailand	Chonthicha Jaemratanasophon
40	7/01/13	\$8,000.00	JPMC account (ending 40442-5)	Chonthicha Jaemratanasophon	Thailand	Chonthicha Jaemratanasophon
41	10/03/13	\$7,000.00	JPMC account (ending 40442-5)	Chonthicha Jaemratanasophon	Thailand	Chonthicha Jaemratanasophon

All in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(2)(A).

COUNTS TWENTY-FIVE THROUGH THIRTY-ONE: (18 U.S.C. §§ 1956(a)(2)(A) and 2 – Transportation of Funds to Promote Unlawful Activity)

23. The factual allegations contained in paragraphs one through four and seven are realleged and incorporated by reference as though fully set forth herein.

24. On or about the dates listed below, in the Northern District of California and elsewhere, the defendants,

ALLEN FONG (a/k/a “Steve Nguyen,” a/k/a “Steve Fujimoto,” a/k/a “John Fujimoto,” a/k/a “David Lee,” a/k/a “May Lee,” a/k/a “Sakura Susa,” a/k/a “Jeff Law,” and a/k/a “Jeff Woo”),

YA HUAI HUNG, and

LEOW WAN RU VERON (a/k/a “Brisa”),

knowingly transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds from the United States to and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, to wit: Use of Interstate and Foreign Commerce in Aid of Racketeering Enterprise, in violation of 18 U.S.C. § 1952; Transportation for Prostitution, in violation of 18 U.S.C. § 2421; and Importation of Alien for Immoral Purpose, in violation of 8 U.S.C. § 1328, as set forth below:

Count	Date of Wire Transfer sent from the United States	Amount of Wire Transfer	Method of Payment	Account Holder(s) or Issuer	Receiving Location Outside the United States	Beneficiary
25	10/26/09	\$2,610.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
26	2/18/10	\$4,500.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
27	6/03/10	\$9,000.00	JPMC account (ending 7464)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
28	7/13/10	\$9,900.00	Bank of America account (ending 68419)	Leow Wan Ru Veron	Singapore	Leow Wan Ru Veron
29	10/26/10	\$2,500.00	JPMC account	Allen Fong & Ya	Singapore	Leow Wan Ru Veron

			(ending 40442-5)	Huai Hung		
30	1/25/11	\$4,000.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron
31	6/30/11	\$9,000.00	JPMC account (ending 40442-5)	Allen Fong & Ya Huai Hung	Singapore	Leow Wan Ru Veron

All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT THIRTY-TWO: (18 U.S.C. §§ 371 & 2421, and 8 U.S.C. § 1328 – Conspiracy to Transport for Prostitution and Importation of Alien for Immoral Purpose)

25. The factual allegations contained in paragraphs one through four and seven are realleged and incorporated by reference as though fully set forth herein.

26. Beginning from at least October 24, 2006, and continuing to at least November 22, 2013, in the Northern District of California and elsewhere, the defendants,

ALLEN FONG (a/k/a “Steve Nguyen,” a/k/a “Steve Fujimoto,” a/k/a “John Fujimoto,” a/k/a “David Lee,” a/k/a “May Lee,” a/k/a “Sakura Susa,” a/k/a “Jeff Law,” and a/k/a “Jeff Woo”),

YA HUAI HUNG,

LEOW WAN RU VERON (a/k/a “Brisa”), and

JIE MU (a/k/a “Jane”),

knowingly conspired with each other, and with other persons known and unknown to the grand jury, to transport an individual in interstate and foreign commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2421, and import an alien into the United States for the purpose of prostitution and to keep, maintain, control, support, employ, and harbor such alien in a house and other place for the purpose of prostitution in pursuance of such illegal importation, in violation of Title 8, United States Code, Section 1328.

27. It was a part and an object of the conspiracy that the defendants,

ALLEN FONG (a/k/a “Steve Nguyen,” a/k/a “Steve Fujimoto,” a/k/a “John Fujimoto,” a/k/a “David Lee,” a/k/a “May Lee,” a/k/a “Sakura Susa,” a/k/a “Jeff Law,” and a/k/a “Jeff Woo”),

YA HUAI HUNG,

LEOW WAN RU VERON (a/k/a “Brisa”), and

JIE MU (a/k/a “Jane”),

knowingly transported, and attempted to transport, a person in interstate and foreign commerce with the

1 intent that such person engage in prostitution and any sexual activity for which any person can be
2 charged with a criminal offense, in violation of Title 18, United States Code, Section 2421.

3 28. It was further a part and an object of the conspiracy that the defendants,

4 ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
5 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
6 "Jeff Woo"),

7 YA HUAI HUNG,

8 LEOW WAN RU VERON (a/k/a "Brisa"), and

9 JIE MU (a/k/a "Jane"),

10 directly and indirectly imported, and attempted to import, into the United States, an alien for the purpose
11 of prostitution and for other immoral purpose, and to keep, maintain, control, support, employ, and
12 harbor such alien in a house and other place, for the purpose of prostitution and other immoral purpose
13 in pursuance of such illegal importation, in violation of Title 8, United States Code, Section 1328.

14 29. In furtherance of the conspiracy and to accomplish the objects of the conspiracy, the
15 defendants and their co-conspirators, and others known and unknown to the Grand Jury, committed the
16 following overt acts, among others, in the Northern District of California and elsewhere, on or about the
17 dates set forth below:

Overt Act	Approximate Date	
1	10/24/06	LEOW WAN RU VERON entered the United States at SFO from Singapore.
2	10/26/06	Two days after LEOW WAN RU VERON entered the United States on 10/24/06, ROBERT CHUN posted a Craigslist prostitution advertisement (#226080485) for a Singaporean female named "Veron" entitled "Sexy Singaporeans or Busty YoYo."
3	3/09/07	An outgoing international wire transfer for \$1,000.00 was sent to LEOW WAN RU VERON in Singapore from the Zenvision Bank account (ending 40008) held jointly by ALLEN FONG and YA HUAI HUNG.
4	4/19/07	LEOW WAN RU VERON entered the United States at SFO from Singapore.
5	4/19/07	On her I-94 immigration entry document ("I-94"), LEOW WAN RU VERON listed the Enterprise brothel at 3144 La Selva Circle, Apt # 6, San Mateo, CA (leased by ALLEN FONG & unnamed CC #1), as the location where she would be staying while in the United States.
6	5/03/07	ALLEN FONG sent an outgoing international wire transfer for \$8,000.00 to LEOW WAN RU VERON in Singapore from FONG's Cathay Bank

1			account (ending 5745).
2	7	5/22/07	ALLEN FONG sent an outgoing international wire transfer for \$9,000.00 to LEOW WAN RU VERON in Singapore from FONG's Cathay Bank account (ending 5745).
3			
4	8	7/06/07	Co-conspirator ELG entered the United States from Singapore.
5	9	7/06/07	On her I-94, co-conspirator ELG listed ALLEN FONG's property at 1030A Balboa Street, San Francisco, CA, as the location where she would be staying while in the United States.
6			
7	10	8/11/07	Co-conspirator SWO entered the United States from Singapore.
8	11	9/04/07	An outgoing international wire transfer for \$3,810.00 was sent to co-conspirator SWO in Singapore from the Zenvision Bank of America account (ending 40008) held jointly by ALLEN FONG and YA HUAI HUNG.
9			
10	12	9/18/07	ALLEN FONG sent an outgoing international wire transfer for \$5,000.00 to LEOW WAN RU VERON in Singapore from FONG's UCB/East West Bank account (ending 8930).
11			
12	13	10/10/07	ALLEN FONG sent an outgoing international wire transfer for \$6,500.00 to LEOW WAN RU VERON in Singapore from FONG's UCB/East West Bank account (ending 8930).
13			
14	14	10/29/07	Based upon flight reservations made by LEOW WAN RU VERON, co-conspirators VK and SHG entered the United States on the same flight from Singapore (through Taipei) to the San Francisco International Airport.
15			
16	15	10/29/07	On her I-94, co-conspirator VK listed the Enterprise brothel at 3144 La Selva Circle, San Mateo, CA (leased by ALLEN FONG & unnamed CC #1), as the location where she would be staying while in the United States.
17			
18	16	10/29/07	On her I-94, co-conspirator SHG listed the Enterprise brothel at 3144 La Selva Circle, San Mateo, CA (leased by ALLEN FONG & unnamed CC #1), as the location where she would be staying while in the United States.
19			
20	17	11/05/07	Based upon flight reservations made by LEOW WAN RU VERON, two Asian women and LEOW WAN RU VERON entered the United States on the same flight from Singapore (through Taipei) to the Los Angeles International Airport ("LAX").
21			
22	18	11/05/07	From LAX, LEOW WAN RU VERON and two Asian women who took the same flight from Singapore to LAX on 11/5/07 also took the same flight from Burbank, CA, to Oakland, CA, on 11/05/07 based upon the domestic airline tickets purchased by ALLEN FONG via his UCB/East West Bank account (ending 8930).
23			
24	19	12/07/07	An outgoing international wire transfer for \$6,000.00 was sent to LEOW WAN RU VERON in Singapore from the UCB account (ending 9185) held jointly by ALLEN FONG and William Sharon.
25			
26			
27			
28			

1	20	1/25/08	An outgoing international wire transfer for \$18,000.00 was sent to LEOW WAN RU VERON in Singapore from the UCB account (ending 9185) held jointly by ALLEN FONG and William Sharon.
2			
3	21	2/22/08	An outgoing international wire transfer for \$14,308.00 was sent to LEOW WAN RU VERON in Singapore from the UCB account (ending 9185) held jointly by ALLEN FONG and William Sharon.
4			
5	22	2/28/08	Co-conspirator SPL entered the United States from Hong Kong.
6	23	2/28/08	On her I-94, co-conspirator SPL listed the San Francisco Residence as the location where she would be staying while in the United States.
7			
8	24	3/08/08	Co-conspirator ELG entered the United States from Singapore.
9	25	3/08/08	On her I-94, co-conspirator ELG listed the San Francisco Residence as the location where she would be staying while in the United States.
10	26	3/15/08	Co-conspirator TMC entered the United States from Singapore.
11	27	3/15/08	On her I-94, co-conspirator TMC listed the San Francisco Residence as the location where she would be staying while in the United States.
12			
13	28	5/22/08	An outgoing international wire transfer for \$6,000.00 was sent to LEOW WAN RU VERON in Singapore from the UCB account (ending 9185) held jointly by ALLEN FONG and William Sharon.
14			
15	29	5/26/08	Co-conspirator SWO entered the United States at LAX from Singapore.
16	30	5/27/08	LEOW WAN RU VERON entered the United States at LAX from Singapore.
17	31	6/30/08	JIE MU sent an outgoing international wire transfer for \$2,000.00 to co-conspirator SWO in Singapore funded from MU's Bank of America account (ending 66425).
18			
19	32	7/30/08	An outgoing international wire transfer for \$5,600.00 was sent to co-conspirator ELG in Singapore from the Zenvision Bank account (ending 40008) held jointly by ALLEN FONG and YA HUAI HUNG.
20			
21	33	7/31/08	Alex Chan sent an outgoing international wire transfer for \$8,000.00 to LEOW WAN RU VERON in Singapore from Chan's Citibank account (ending 7310).
22			
23	34	9/09/08	An outgoing international wire transfer for \$3,500.00 was sent to co-conspirator ELG in Singapore from the Zenvision Bank account (ending 40008) held jointly by ALLEN FONG and YA HUAI HUNG.
24			
25	35	9/16/08	Co-conspirator TMC entered the United States from Singapore.
26	36	9/16/08	On her I-94, co-conspirator TMC listed the San Francisco Residence as the location where she would be staying while in the United States.
27			
28	37	9/16/08	Co-conspirator TMH entered the United States from Singapore.

1	38	9/16/08	On her I-94, co-conspirator TMH listed the San Francisco Residence as the location where she would be staying while in the United States.
2	39	9/19/08	Co-conspirator PYY entered the United States from Singapore.
3	40	9/19/08	On her I-94, co-conspirator PYY listed the San Francisco Residence as the location where she would be staying while in the United States.
4	41	9/20/08	On or about 9/20/08, co-conspirator TMC was present inside the Enterprise brothel at 337 S. Fremont Street, Apt #311, San Mateo, CA, leased by William Sharon, when encountered by a leasing staff member.
5	42	10/23/08	Co-conspirator TMH and another prostitute were present inside the Enterprise brothel at 39440 Civic Center Drive, Apt # 214, Fremont, CA, leased by William Sharon, during a law enforcement investigation.
6	43	10/24/08	An outgoing international wire transfer for \$4,000.00 was sent to co-conspirator NBH in Singapore from the Zenvision Bank of America account (ending 40008) held jointly by ALLEN FONG and YA HUAI HUNG.
7	44	11/23/08	Co-conspirator NBH entered the United States from Singapore.
8	45	11/23/08	On her I-94, co-conspirator NBH listed the Enterprise brothel at 247 Arriba Street, Apt # 4, Sunnyvale, CA, leased by William Sharon, as the location she would be staying while in the United States.
9	46	11/27/08	Co-conspirator SWO entered the United States at SFO from Singapore.
10	47	11/27/08	On her I-94, co-conspirator SWO listed the San Francisco Residence as the location where she would be staying while in the United States.
11	48	12/20/08	LEOW WAN RU VERON departed the United States from SFO to Singapore.
12	49	2/13/09	Co-conspirator SWO was present inside the Enterprise brothel at 337 S. Fremont Street, Apt #119, San Mateo, CA, leased by William Sharon, during an undercover law enforcement operation.
13	50	3/20/09	An outgoing international wire transfer for \$2,500.00 was sent to co-conspirator NBH in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
14	51	4/08/09	In a recorded telephone conversation on 4/08/09, ALLEN FONG told a prostitute that he had to pick up a woman from the airport on 4/08/09, and that the woman would start working on 4/10/09, the day his "new place" in Cupertino would be open.
15	52	4/08/09	ALLEN FONG picked up co-conspirator TTN, who was arriving from Singapore, at SFO, and drove her to the Enterprise brothel at 505 Shell Parkway, Apt #1106, Redwood City, CA, leased by William Sharon.
16	53	4/22/09	LEOW WAN RU VERON entered the United States at SFO from Singapore.
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1	54	4/22/09	On her I-94, LEOW WAN RU VERON listed 1030A Balboa St, San Francisco, CA, which was YA HUAI HUNG's residence owned by ALLEN FONG, as the location where she would be staying while in the United States.
2			
3	55	4/23/09	Co-conspirator VK sexually solicited an undercover officer inside the Enterprise brothel on 2723 S. Norfolk Street, Apt #311, San Mateo, CA (leased by William Sharon).
4			
5	56	6/01/09	JIE MU was at SFO to pick up co-conspirator HCS, who was entering the United States from China.
6			
7	57	6/01/09	Co-conspirator HCS provided Customs & Border Protection officers with the address of 19608 Pruneridge Road, Cupertino, CA, leased by William Sharon, as the location where she would be staying while in the United States.
8			
9			
10	58	8/18/09	An outgoing international wire transfer for \$1,500.00 was sent to co-conspirator NBH in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
11			
12	59	9/08/09	An outgoing international wire transfer for \$2,000.00 was sent to co-conspirator NBH in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
13			
14	60	9/22/09	Co-conspirator HCS was present inside the Enterprise brothel at 19608 Pruneridge Avenue, Apt #8105, Cupertino, CA, leased by William Sharon, during an undercover law enforcement operation.
15			
16	61	10/26/09	An outgoing international wire transfer for \$2,610.00 was sent to LEOW WAN RU VERON in Singapore from the JPMC account (ending 40442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
17			
18	62	12/18/09	In a recorded telephone conversation on 12/18/09, ALLEN FONG told a prostitute that "tons" of girls were arriving "next month" from "Singapore, Taiwan, and Hong Kong," and that he is "international."
19			
20	63	2/02/10	An outgoing international wire transfer for \$1,800.00 was sent to co-conspirator NBH in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
21			
22	64	2/18/10	An outgoing international wire transfer for \$4,500.00 was sent to LEOW WAN RU VERON in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
23			
24	65	5/05/10	LEOW WAN RU VERON entered the United States at SFO from Singapore.
25			
26	66	10/26/10	An outgoing international wire transfer for \$2,500.00 was sent to LEOW WAN RU VERON in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
27			
28	67	12/01/10	Co-conspirator BHS entered the United States from Beijing, China.
	68	12/01/10	As part of her entry into the United States, co-conspirator BHS declared

		that she was visiting her friend "Steve Fujimoto," an alias used by ALLEN FONG.
69	12/01/10	On her I-94, co-conspirator BHS listed the San Francisco Residence as the location where she would be staying while in the United States.
70	1/25/11	An outgoing international wire transfer for \$4,000.00 was sent to LEOW WAN RU VERON in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
71	6/30/11	An outgoing international wire transfer for \$9,000.00 was sent to LEOW WAN RU VERON in Singapore from the JPMC account (ending 0442-5) held jointly by ALLEN FONG and YA HUAI HUNG.
72	10/26/11	CHONTHICHA JAEMRATANASOPHIN entered the United States from Hong Kong.
73	11/16/11	Beginning on 11/16/11, CHONTHICHA JAEMRATANASOPHIN used 2715 S. Norfolk Street, Apt #111, San Mateo, CA, leased by Alex Chan, as her residential address on her JP Morgan Chase bank statements.
74	3/13/12	Beginning on 3/13/12, CHONTHICHA JAEMRATANASOPHIN used 2759 S. Norfolk Street, Apt #211, San Mateo, CA, leased by ANGELINA CHUONG, as her residential address on her JP Morgan Chase bank statements.
75	4/12/12	Beginning on 4/12/12, CHONTHICHA JAEMRATANASOPHIN used 2401 Erin Place, South San Francisco, CA, leased by Enterprise members, as her residential address on her JP Morgan Chase bank statements.
76	10/12/12	Beginning on 10/12/12, CHONTHICHA JAEMRATANASOPHIN used Allen Fong's residential address in San Mateo, CA, as her residential address on her JP Morgan Chase bank statements.
77	1/12/13	Beginning on 1/12/13, CHONTHICHA JAEMRATANASOPHIN used 2759 S. Norfolk Street, Apt #103, San Mateo, CA, leased by KEVIN HARTIG, as her residential address on her JP Morgan Chase bank statements.
78	6/13/13	Beginning on 6/13/13, CHONTHICHA JAEMRATANASOPHIN used 3 Plaza View Lane, Apt # 309, Foster City, CA, leased by ALLEN FONG, as her residential address on her JP Morgan Chase bank statements.
79	11/22/13	CHONTHICHA JAEMRATANASOPHIN and another prostitute were present inside the Enterprise brothel at 3 Plaza View Lane, Apt # 309, Foster City, CA, leased by ALLEN FONG, during an undercover law enforcement operation.

All in violation of Title 18, United States Code, Sections 371 & 2421, and Title 8, United States Code, Section 1328.

1 FORFEITURE ALLEGATIONS: (18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), 1963, 2428, and 28 U.S.C.
2 § 2461)

3 30. The factual allegations contained in Count One of this Indictment are hereby realleged
4 and by this reference fully incorporated herein for the purpose of alleging forfeiture as set forth below.

5 31. Upon conviction of the offense alleged in Count One of this Indictment, the defendants,
6 ALLEN FONG (a/k/a "Steve Nguyen" a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
7 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
8 "Jeff Woo"),

9 YA HUAI HUNG,

10 LEOW WAN RU VERON (a/k/a "Brisa"),

11 ROBERT CHUN,

12 JIE MU (a/k/a "Jane"),

13 LAURENCE SHU KWAN LEE,

14 KEVIN HARTIG,

15 WAYLEN FONG,

16 ANGELINA CHUONG, and

17 CHONTHICHA JAEMRATANASOPHIN (a/k/a "Nana"),

18 shall, pursuant to 18 U.S.C. § 1963, forfeit to the United States:

19 a. any interest acquired or maintained in violation of section 1962;

20 b. any interest in, security of, claim against, or property or contractual right of any kind
21 affording a source of influence over, any enterprise which the defendants established, operated,
22 controlled, conducted, or participated in the conduct of, in violation of section 1962; and

23 c. any property constituting, or derived from, any proceeds obtained, directly or indirectly,
24 from racketeering activity or unlawful debt collection in violation of section 1962.

25 32. Upon conviction of the offense alleged in Count Two of this Indictment, the defendants,

26 ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
27 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
28 "Jeff Woo"),

LEOW WAN RU VERON (a/k/a "Brisa"),

ROBERT CHUN,

JIE MU (a/k/a "Jane"),

1 LAURENCE SHU KWAN LEE, and

2 YA HUAI HUNG,

3 shall, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), forfeit to the United States any
4 property, real or personal, which constitutes or is derived from proceeds traceable to said offense, or a
5 conspiracy to commit said offense.

6
7 33. Upon conviction of any of the offenses alleged in Counts Three through Thirteen of this
8 Indictment, the defendant,

9 ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
10 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
11 "Jeff Woo"),

12 shall, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), forfeit to the United States any
13 property, real or personal, which constitutes or is derived from proceeds traceable to said offenses, or a
14 conspiracy to commit said offenses.

15 34. Upon conviction of the offense alleged in Count Fourteen of this Indictment, the
16 defendants,

17 ALLEN FONG (a/k/a "Steve Nguyen," a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
18 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
19 "Jeff Woo"),

20 YA HUAI HUNG,

21 WAYLEN FONG,

22 KEVIN HARTIG,

23 ROBERT CHUN, and

24 ANGELINA CHUONG,

25 shall, pursuant to 18 U.S.C. § 982(a)(1), forfeit to the United States any property, real and personal,
26 involved in said offense, or any property traceable to such property.

27 35. Upon conviction of any of the offenses alleged in Count Fifteen through Twenty-Three of
28 this Indictment, the defendant,

ALLEN FONG (a/k/a "Steve Nguyen" a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
"Jeff Woo"),

1 shall, pursuant to 18 U.S.C. § 982(a)(1), forfeit to the United States any property, real and personal,
2 involved in said offenses, or any property traceable to such property.

3 36. Upon conviction of the offense alleged in Count Twenty-Four of this Indictment, the
4 defendants,

5 ALLEN FONG (a/k/a "Steve Nguyen" a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
6 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
"Jeff Woo"),

7 YA HUAI HUNG,

8 LEOW WAN RU VERON (a/k/a "Brisa"),

9 CHONTHICHA JAEMRATANASOPHIN (a/k/a "Nana"), and

10 JIE MU (a/k/a "Jane"),

11 shall, pursuant to 18 U.S.C. § 982(a)(1), forfeit to the United States any property, real and personal,
12 involved in said offense, or any property traceable to such property.

13 37. Upon conviction of any of the offenses alleged in Counts Twenty-Five through Thirty-
14 One of this Indictment, the defendants,

15 ALLEN FONG (a/k/a "Steve Nguyen" a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
16 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
"Jeff Woo"),

17 YA HUAI HUNG, and

18 LEOW WAN RU VERON (a/k/a "Brisa"),

19 shall, pursuant to 18 U.S.C. § 982(a)(1), forfeit to the United States any property, real and personal,
20 involved in said offenses, or any property traceable to such property.

21 38. Upon conviction of the offense alleged in Count Thirty-Two, the defendants,

22 ALLEN FONG (a/k/a "Steve Nguyen" a/k/a "Steve Fujimoto," a/k/a "John Fujimoto,"
23 a/k/a "David Lee," a/k/a "May Lee," a/k/a "Sakura Susa," a/k/a "Jeff Law," and a/k/a
"Jeff Woo"),

24 YA HUAI HUNG,

25 LEOW WAN RU VERON (a/k/a "Brisa"), and

26 JIE MU (a/k/a "Jane"),

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

1 offense, or a conspiracy to commit said offense; and shall, pursuant to 18 U.S.C. §2428 forfeit to the
2 United States any property, real or personal, that was used or intended to be used to commit or to
3 facilitate the commission of such violation; and any property, real or personal, constituting or derived
4 from any proceeds that such person obtained, directly or indirectly, as the result of such violation.

5 39. If, as a result of any act or omission of the defendants, any of the property subject to
6 forfeiture

7 a. cannot be located upon the exercise of due diligence;

8 b. has been transferred or sold to or deposited with, a third person;

9 c. has been placed beyond the jurisdiction of the Court;

10 d. has been substantially diminished in value; or

11 e. has been commingled with other property which cannot be divided without difficulty;

12 any and all interest defendants have in any other property (up to the value of the property subject to
13 forfeiture), shall be forfeited to the United States pursuant to 18 U.S.C. § 1963(m) and 21 U.S.C.
14 § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

15 All in violation of 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), 1963, 2428; 21 U.S.C. § 853; 28 U.S.C
16 § 2461(c); and Rule 32.2 of the Federal Rules of Criminal Procedure.

17 DATED: October 16, 2014

A TRUE BILL.

18
19 Nancy J. Peterson
20 FOREPERSON

21
22 MELINDA HAAG
United States Attorney

23 J. Douglas Wilson
24 J. DOUGLAS WILSON
Chief, Criminal Division

25
26 (Approved as to form: DRD)
27 Deborah R. Douglas
Assistant United States Attorney