

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

<b>U.S. DISTRICT COURT</b>
<b>NORTHERN DISTRICT OF TEXAS</b>
<b>FILED</b>
MAY 25 2005
<b>CLERK, U.S. DISTRICT COURT</b>
By _____ Deputy

UNITED STATES OF AMERICA

v.

SEAN CUNG-KIM NGUYEN (01)  
a/k/a "Sean Cung Nguyen"  
DAI QUOC NGUYEN (02)  
XUYEN THI-KIM NGUYEN (03)  
a/k/a "Kim Xuyen Nguyen"  
TAM NGUYEN (04)  
MYNA TRAN (05)  
HONG THANH DUONG (06)  
CUC KIM TRAN (07)

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No. **3 05 CR 0124 - M**

File Under Seal

INDICTMENT

The Grand Jury Charges:

Introduction

At all times material to this indictment:

1. Defendant **Sean Cung-Kim Nguyen**, also known as Sean Cung Nguyen, was employed as a mortgage broker for Century Mortgage, 2410 East Arkansas Lane, Suite 342, Arlington, Texas.

2. Defendant **Dai Quoc Nguyen** was employed as a sales representative for Re/Max, 1221 Abrams Road, Suite 130, Richardson, Texas and a loan officer for United Capital Mortgage, Inc., 3733 West Walnut Street, Garland, Texas.

3. Defendant **Myna Tran** was employed as a mortgage broker for Ultima Real Estate Services, 13604 Midway, Suite 183, Dallas, Texas.

4. Asia Financial Group, 124 West Pioneer Parkway, Arlington, Texas, brokered loans, primarily for home purchases, by submitting completed loan applications to mortgage companies, including Countrywide Home Loans, d.b.a. America's Wholesale Lender.

5. ATCOD, Inc., doing business as (d.b.a.) American Title Company, with offices located at 3733 West Walnut Street, Garland, Texas, and 6029 Beltline Road, Suite 200, Dallas, Texas, served as the title company in connection with a number of mortgage loans brokered by Asia Financial Group.

6. SLTC, Inc., d.b.a. North American Title Company, with offices located at 1211 South Bowen Road, Suite 100, Arlington, Texas, and 500 North Akard, Suite 2900, Dallas, Texas, served as the title company in connection with a number of mortgage loans brokered by Asia Financial Group.

7. Countrywide Home Loans, d.b.a. America's Wholesale Lender, was headquartered in Calabasas, California, but with a branch office at 15601 Dallas Parkway, Addison, Texas. Through Asia Financial and other mortgage brokers, Countrywide Home Loans offered a "No Income No Assets" (NINA) mortgage loan program allowing qualified applicants to obtain mortgages up to \$400,000 without verifying income or assets for the home purchaser.

Count One

Conspiracy to Commit Mail Fraud, Wire Fraud, and Illegal Monetary Transactions  
(Violation of 18 U.S.C. § 371 (18 U.S.C. §§ 1341, 1343, and 1957(a)))

Beginning in or about January 2002, and continuing through on or about January 30, 2004, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Sean Cung-Kim Nguyen**, also known as “Sean Cung Nguyen,” **Dai Quoc Nguyen**, **Xuyen Thi-Kim Nguyen**, also known as “Kim Xuyen Nguyen,” **Tam Nguyen**, **Myna Tran**, **Hong Thanh Duong**, and **Cuc Kim Tran**, did knowingly and willfully combine, conspire, confederate and agree with each other, and with other persons both known and unknown to the Grand Jury, to commit the following offenses against the United States, to wit:

(a) with intent to defraud, knowingly devising and attempting to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, by placing in any post office or authorized depository materials for delivery through the United States mail and depositing and causing to be deposited materials for delivery through private and commercial interstate carriers, in violation of 18 U.S.C. § 1341;

(b) with intent to defraud, knowingly devising and attempting to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, by transmitting and causing to be transmitted certain writings by means of wire communications in interstate commerce, in violation of 18 U.S.C. § 1343; and

(c) knowingly engaging and attempting to engage in monetary transactions involving criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, in violation of 18 U.S.C. § 1957(a).

**MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that the defendants and their co-conspirators would and did:

1. locate single family residences located in and around the Dallas, Texas area offered for sale;
2. recruit straw purchasers and borrowers to apparently purchase the targeted single family residences;
3. inflate the value of the targeted single family residences to an amount substantially greater than the fair market value of the property;
4. prepare and submit false and fraudulent loan applications in the names of the straw purchasers in order to secure a mortgage loan for the targeted single family residences in an amount substantially greater than the fair market value of the purchased property;
5. obtain substantially inflated loans from Countrywide Home Loans, d.b.a. America's Wholesale Lender, based on the false and fraudulent misrepresentations about the value of the targeted single family residences; and

6. pay the original owners of the targeted single family residence and distribute the remaining fraudulently obtained loan proceeds among the coconspirators.

**OVERT ACTS**

In furtherance of the conspiracy and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed the following overt acts, among others, in the Dallas Division of the Northern District of Texas, and elsewhere:

**3349 Stoneway Drive, Grand Prairie, Texas:**

1. In or about January 2002, **Dai Nguyen** contacted E.W., the owner of the residence located at 3349 Stoneway Drive, Grand Prairie, Texas, about listing that residence for sale. In connection with this representation, **Dai Nguyen** convinced E.W. to list that residence's sale price as \$222,000.

2. On or about May 22, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 3349 Stoneway Drive, estimating the market value of that residence to be \$344,000.

3. In or about June 2002, a person unknown to the Grand Jury recruited J.P. as a straw borrower to purchase 3349 Stoneway Drive from E.W.

4. On or about June 6, 2002, **Sean Nguyen**, aided and assisted by a person unknown to the Grand Jury, provided J.P. with approximately \$25,000 in cash for use in

purchasing a cashier's check to be used as a portion of the down payment in closing the purchase of 3349 Stoneway Drive.

5. On or about June 6, 2002, J.P. executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower J.P.'s purchase of 3349 Stoneway Drive from E.W. for the inflated amount of \$342,000.

6. On or about June 6, 2002, **Sean Nguyen**, aided and assisted by a person not known to the Grand Jury, paid J.P. \$7,000 in cash for his assistance in closing the fraudulent purchase of 3349 Stoneway Drive.

7. On or about June 6, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 3349 Stoneway Drive to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$307,800.

8. On or about June 5, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender to fund and transmit by wire communication \$303,369.78 to North American Title Company in order to close straw borrower J.P.'s purchase of 3349 Stoneway Drive from E.W.

9. On or about June 7, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused North American

Title Company to pay off the original mortgage on E.W.'s house, using a portion of the loan proceeds received from Countrywide Home Loans, d.b.a. America's Wholesale Lender, by sending a check via private and commercial carrier Federal Express in the amount of \$187,180.65 to World Savings Bank in San Antonio, Texas.

10. On or about June 6, 2002, **Dai Nguyen** caused North American Title Company to transmit by wire communication excess loan proceeds in the amount of \$149,055.47 to **Dai Nguyen's** personal account, maintained at Washington Mutual Bank, account number \*\*\*\*\*5810.

11. On or about June 6, 2002, **Dai Nguyen** withdrew a portion of the loan proceeds deposited in his personal account by issuing checks payable to: a) **Sean Nguyen** for \$50,000; b) L.T. for \$30,000.00; c) M.W. (the spouse of E.W.) for \$17,185; and d) M.W. for \$2,000.

**2727 Rolling Hills Lane, Grand Prairie, Texas:**

12. In or about April 2002, **Dai Nguyen** contacted J.G., the owner of the residence located at 2727 Rolling Hills Lane, Grand Prairie, Texas, about listing that residence for sale. In connection with this representation, **Dai Nguyen** listed that residence's sale price as \$219,900.

13. On or about June 5, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 2727 Rolling Hills Lane, estimating the market value of that residence to be \$345,000.

14. In or about June 2002, a person known to the Grand Jury recruited H.K. as a straw borrower to purchase 2727 Rolling Hills Lane from J.G.

15. On or about June 18 and 20, 2002, H.K. executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower H.K.'s purchase of 2727 Rolling Hills Lane from J.G. for the inflated amount of \$345,000.

16. On or about June 18 and 20, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 2727 Rolling Hills Lane to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$327,750.

17. On or about June 18, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender to fund and transmit by wire communication \$323,915.37 to American Title Company in order to close straw borrower H.K.'s purchase of 2727 Rolling Hills Lane from J.G.

18. On or about June 20, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused American Title Company to pay off the original mortgage on J.G.'s house, using a portion of the loan proceeds received from Countrywide Home Loans, d.b.a. America's Wholesale Lender,

by sending a check via private and commercial carrier Federal Express in the amount of \$188,644.94 to Bank of America in Getzville, New York.

19. On or about June 20, 2002, **Dai Nguyen** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$153,619.21 to **Dai Nguyen's** personal account, maintained at Washington Mutual Bank, account number \*\*\*\*\*5810.

20. On or about June 19 and 21, 2002, **Dai Nguyen** withdrew a portion of the loan proceeds deposited in his Wells Fargo account by making cash withdrawals in the amounts of \$120,000 and \$6,000 and issued a check payable to J.G. for \$17,730.

**2304 Spenrock Court, Lewisville, Texas:**

21. In or about June 2002, **Dai Nguyen** contacted T.N., who had decided to sell his residence located at 2304 Spenrock Court, Lewisville, Texas. **Dai Nguyen** agreed to purchase T.N.'s residence for \$250,000.

22. On or about June 11, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 2304 Spenrock Court, estimating the market value of that residence to be \$420,000.

23. In or about June 2002, a person known to the Grand Jury recruited S.M. as a straw borrower to purchase 2304 Spenrock Court from T.N.

24. On or about June 26, 2002, a person unknown to the Grand Jury provided S.M. with a Community Credit Union Cashier's Check in the amount of \$33,198.57 to be

used as a portion of the down payment in closing the purchase of 2304 Spenrock Court.

The funds for this Cashier's Check were obtained from K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

25. On or about June 26, 2002, S.M. executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower S.M.'s purchase of 2304 Spenrock Court from T.N. for the inflated amount of \$420,000.

26. On or about June 26, 2002, **Sean Nguyen and Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 2304 Spenrock Court to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$399,000.

27. On or about June 25, 2002, **Sean Nguyen and Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender to fund and transmit by wire communication \$395,096.79 to American Title Company to in order close straw borrower S.M.'s purchase of 2304 Spenrock Court from T.N.

28. On or about June 26, 2002, **Sean Nguyen and Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused American Title Company to pay off the original mortgage on T.N.'s house, using a portion of the loan

proceeds received from Countrywide Home Loans, d.b.a. America's Wholesale Lender, by sending a check via private and commercial carrier Federal Express in the amount of \$188,203.78 to World Savings Bank in San Antonio, Texas.

29. On or about June 26, 2002, **Dai Nguyen** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$109,003 to **Dai Nguyen's** personal account, maintained at Washington Mutual Bank, account number \*\*\*\*\*5810.

30. On or about June 27, 2002, **Dai Nguyen** withdrew a portion of the loan proceeds deposited in his personal account by obtaining cashier's checks payable to: a) "Century Mortgage" for \$30,000; b) "Century Mortgage" for \$31,500; c) U.C. Financial (a company controlled by **Sean Nguyen's** partner, T.Q.) for \$30,000; and d) T.N. for \$64,000.

31. On or about June 26, 2002, **Dai Nguyen** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$119,619.82 to K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

32. On or about June 28, 2002, **Tam Nguyen**, aided and assisted by K.H., withdrew a portion of the loan proceeds deposited in K.H. and **Tam Nguyen's** personal account by obtaining cashier's checks payable to: a) **Sean Nguyen** for \$10,400; b) **Sean**

**Nguyen** for \$10,400; c) Century Mortgage for \$10,400; and d) Century Mortgage for \$10,400.

**1901 Walnut Hill Drive, Rowlett, Texas:**

33. In or about June 2002, **Dai Nguyen** agreed to help H.D. to sell his (H.D.'s) residence located at 1901 Walnut Hill Drive, Rowlett, Texas for the list price of \$195,000.

34. On or about June 20, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 1901 Walnut Hill Drive, estimating the market value of that residence to be \$420,000.

35. On or about June 20, 2002, straw borrower T.H. executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower T.H.'s purchase of 1901 Walnut Hill Drive from H.D. for the inflated amount of \$420,000.

36. On or about July 8, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 1901 Walnut Hill Drive to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$399,000.

37. On or about July 5, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender, to fund and transmit by wire communication \$393,818.44

to American Title Company in order to close straw borrower T.H.'s purchase of 1901 Walnut Hill Drive from H.D.

38. On or about July 9, 2002, **Dai Nguyen** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$308,699.43 to **Dai Nguyen's** personal account, maintained at Washington Mutual Bank, account number \*\*\*\*\*5810.

39. On or about July 9, 2002, **Dai Nguyen** withdrew a portion of the loan proceeds deposited in his personal account by obtaining cashier's checks payable to: a) **Dai Nguyen** for \$30,000; b) **Sean Nguyen** for \$40,000; c) Century Mortgage for \$40,000; d) U.C. Financial (a company controlled by **Sean Nguyen's** partner, T.Q.) for \$43,200; and e) H.D. for \$74,273.

**7605 Constitution, Plano, Texas:**

40. In or about June 2002, **Dai Nguyen**, aided and assisted by a person known to the Grand Jury, contacted K.T. and Q.T., who had decided to sell their residence located at 7605 Constitution, Plano, Texas. **Dai Nguyen** agreed to find a purchaser for K.T. and Q.T.'s residence who was willing to pay \$220,000.

41. On or about July 12, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 7605 Constitution, estimating the market value of that residence to be \$420,000.

42. In or about July 2002, a person known to the Grand Jury recruited S.C. as a straw borrower to purchase 7605 Constitution from K.T. and Q.T.

43. On or about July 12 and 22, 2002, S.C. executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower S.C.'s purchase of 7605 Constitution from K.T. and Q.T. for the inflated amount of \$418,000.

44. On or about July 22, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 7605 Constitution to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$376,200.

45. On or about July 22, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender, to fund and transmit by wire communication \$373,545.11 to American Title Company in order to close straw borrower S.C.'s purchase of 7605 Constitution from K.T. and Q.T.

46. On or about July 24, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused American Title Company to pay off the original mortgage on K.T. and Q.T.'s house, using a portion of the loan proceeds received from Countrywide Home Loans, d.b.a. America's Wholesale

Lender, by sending a check via private and commercial carrier Federal Express in the amount of \$46,491.62 to Chase Manhattan Mortgage Corp. in Columbus, Ohio.

47. On or about July 24, 2002, **Dai Nguyen** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$203,180.33 to **Dai Nguyen's** personal account, maintained at Washington Mutual Bank, account number \*\*\*\*\*5810.

48. On or about July 24, 2002, **Dai Nguyen** withdrew a portion of the loan proceeds deposited in his personal account by obtaining cashier's checks payable to: a) **Tam Nguyen** for \$30,000; b) **Tam Nguyen** for \$30,000; c) **Tam Nguyen** for \$30,000; d) **Sean Nguyen** for \$36,290; e) **Sean Nguyen** for \$36,290; and f) FS Remarketing for \$37,246.21.

49. On or about July 24, 2002, **Tam Nguyen** deposited one of the Washington Mutual Bank Cashier's Checks received from **Dai Nguyen** (Check No. 589528012) in the amount of \$30,000 into K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

50. On or about July 24, 2002, **Tam Nguyen** obtained a Community Credit Union Cashier's Check in the amount of \$50,946, which was used as a portion of the down payment in closing the purchase of 7605 Constitution. The funds for this Cashier's Check were obtained from K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

**421 Ivan Drive, Lewisville, Texas:**

51. In or about July 2002, **Dai Nguyen** spoke with H.N., who had decided to sell his residence located at 421 Ivan Drive, Lewisville, Texas. **Dai Nguyen** agreed to purchase H.N.'s residence for \$195,000.

52. On or about July 11, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 421 Ivan Drive, estimating the market value of that residence to be \$400,000.

53. In or about July 2002, **Xuyen Nguyen** recruited **Hong Duong** as a straw borrower to purchase 421 Ivan Drive from H.N.

54. On or about July 25 and August 1, 2002, **Duong** and a person unknown to the Grand Jury executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower **Duong's** purchase of 421 Ivan Drive from H.N. for the inflated amount of \$398,000.

55. On or about August 1, 2002, **Tam Nguyen** deposited one of the Washington Mutual Bank Cashier's Checks previously received from **Dai Nguyen** (Check No. 589528013) in the amount of \$30,000 into K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

56. On or about August 1, 2002, **Tam Nguyen** obtained a Community Credit Union Cashier's Check in the amount of \$29,000, which was used as a portion of the down payment in closing the purchase of 421 Ivan Drive. The funds for this Cashier's

Check were obtained from K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

57. On or about August 1, 2002, **Tam Nguyen** obtained a Community Credit Union Cashier's Check in the amount of \$15,000 made payable to **Duong**. The funds for this Cashier's Check were obtained from K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

58. On or about August 1, 2002, **Xuyen Nguyen** provided **Duong** with the Community Union Cashier's Check in the amount of \$15,000 as payment for **Duong's** assistance in the 421 Ivan Drive transaction, which was later deposited in **Duong's** personal account, maintained at US Bank, account number \*\*\*\*\*5605.

59. On or about August 1, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 421 Ivan Drive to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$378,100.

60. On or about August 2, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender to fund and transmit by wire communication \$372,683.24 to American Title Company in order to close straw borrower **Duong's** purchase of 421 Ivan Drive from H.N.

61. On or about August 2, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused American Title Company to pay off the original mortgage on H.N.'s house, using a portion of the loan proceeds received from Countrywide Home Loans, d.b.a. America's Wholesale Lender, by sending a check via private and commercial carrier Federal Express in the amount of \$101,974.23 to Wells Fargo Home Mortgage in Des Moines, Iowa.

62. On or about August 2, 2002, **Dai Nguyen** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$212,200.76 to **Dai Nguyen's** personal account, maintained at Washington Mutual Bank, account number \*\*\*\*\*8155.

63. On or about August 2, 2002, **Dai Nguyen** withdrew a portion of the loan proceeds deposited in his personal account by obtaining cashier's checks payable to: a) **Tam Nguyen** for \$26,333; b) **Tam Nguyen** for \$26,333; c) **Sean Nguyen** for \$23,333; d) **Sean Nguyen** for \$23,333; and e) **Sean Nguyen** for \$23,333.

**4010 Ridgecrest Trail, Carrollton, Texas:**

64. On or about June 6, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 4010 Ridgecrest Trail, Carrollton, Texas, estimating the market value of that residence to be \$350,000.

65. In or about May 2002, **Xuyen Nguyen** recruited **Cuc Tran** as a straw borrower to purchase 4010 Ridgecrest Trail from P.N.

66. On or about July 29 and August 7, 2002, **Cuc Tran** and a person unknown to the Grand Jury executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower **Cuc Tran's** purchase of 4010 Ridgecrest Trail from P.N. for the inflated amount of \$350,000.

67. On or about August 7, 2002, **Tam Nguyen** deposited one of the Washington Mutual Bank Cashier's Checks previously received from **Dai Nguyen** in the amount of \$26,333 into K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

68. On or about August 7, 2002, **Tam Nguyen** obtained a Community Credit Union Cashier's Check in the amount of \$25,946, which was used as a portion of the down payment in closing the purchase of 4010 Ridgecrest Trail. The funds for this Cashier's Check were obtained from K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

69. On or about August 7, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 4010 Ridgecrest Trail to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$332,500.

70. On or about August 7, 2002, **Sean Nguyen** and **Dai Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide

Home Loans, d.b.a. America's Wholesale Lender to fund and transmit by wire communication \$326,618.63 to American Title Company in order to close straw borrower **Cuc Tran's** purchase of 4010 Ridgecrest Trail from P.N.

71. On or about August 9, 2002, **Dai Nguyen** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$146,436.65 to **Dai Nguyen's** personal account, maintained at Washington Mutual Bank, account number \*\*\*\*\*8155.

72. On or about August 9, 2002, **Dai Nguyen** withdrew a portion of the loan proceeds deposited in his personal account by obtaining cashier's checks payable to: a) Century Mortgage for \$10,333.33; b) Century Mortgage for \$10,333.33; c) Century Mortgage for \$10,333.33; d) **Tam Nguyen** for \$21,702.66; e) **Tam Nguyen** for \$21,702.66; and f) **Tam Nguyen** for \$21,702.66.

73. On or about August 10, 2002, **Tam Nguyen** obtained a Community Credit Union Cashier's Check in the amount of \$8,000 and made payable to straw borrower **Cuc Tran**. The funds for this Cashier's Check were obtained from K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

74. On or about August 10, 2002, **Xuyen Nguyen** provided **Cuc Tran** with the Community Union Cashier's Check in the amount of \$8,000 as partial payment for **Cuc Tran's** assistance in the 4010 Ridgecrest Trail transaction, which was later deposited in **Tran's** personal account, maintained at US Bank, account number \*\*\*\*\*9986.

**6319 Fox Hunt Drive, Arlington, Texas:**

75. In or about September 2002, **Myna Tran** spoke with A.N., who had decided to sell her residence located at 6319 Fox Hunt Drive, Arlington, Texas. **Myna Tran** agreed to list A.N.'s residence for sale at the price of \$239,000 and claimed to have a buyer for the residence from California.

76. On or about September 16, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 6319 Fox Hunt Drive, estimating the market value of that residence to be \$440,000.

77. In or about September 2002, a person unknown to the Grand Jury recruited P.H. as a straw borrower to purchase 6319 Fox Hunt Drive from A.N.

78. On or about October 3, 2002, P.H. executed fraudulent loan documents to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, for financing to close straw borrower P.H.'s purchase of 6319 Fox Hunt Drive from A.N. for the inflated amount of \$440,000.

79. On or about October 3, 2002, a person unknown to the Grand Jury obtained and submitted a payment in the amount of \$50,882.59 as a portion of the down payment in closing the purchase of 6319 Fox Hunt Drive.

80. On or about October 3, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for

the purchase of 6319 Fox Hunt Drive to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$396,000.

81. On or about October 3, 2002, **Sean Nguyen** and **Myna Tran**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender, to fund and transmit by wire communication \$391,299.72 to American Title Company in order to close straw borrower P.H.'s purchase of 6319 Fox Hunt Drive from A.N.

82. On or about October 3, 2002, **Myna Tran**, aided and assisted by other persons unknown to the Grand Jury, caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$225,037.77 to A.N.'s personal account, maintained at Bank One, account number \*\*\*\*\*9283.

83. On or about October 3, 2002, A.N. met **Myna Tran** at the Bank One, located at 1600 East Pioneer Parkway, Arlington, Texas. Following **Myna Tran's** instructions, A.N. signed check number 2043 which was used to draw \$186,288.00 from A.N.'s personal account, maintained at Bank One, account number \*\*\*\*\*9283.

84. On or about October 3, 2002, **Myna Tran**, aided and assisted by other persons unknown to the Grand Jury, used the funds withdrawn from A.N.'s account to obtaining approximately \$80,000 in cash and cashier's checks payable to: a) J.T. for \$21,000; b) A.D. for \$21,000; c) J&A for \$11,000; d) Roxy for \$5,000; e) P.T. for

\$11,500; f) P.N. for \$21,000; g) L.D. for \$3,288; h) L.D. for \$10,000; and i) D.C. for \$2,500.

85. On or about October 9, 2002, **Sean Nguyen** deposited the cashier's check made out to A.D. for \$21,000 into the Century Mortgage account, maintained at Bank One, account number \*\*\*\*\*5555.

86. In or about October 2002, **Myna Tran**, when confronted by A.N., further concealed the theft scheme by claiming that the large amount of money had been transferred to A.N.'s personal account because of the type of loan that the buyer used to purchase A.N.'s house.

**6727 Silvercrest Drive, Arlington, Texas:**

87. In or about October 2002, **Sean Nguyen** spoke with L.P., who had decided to sell her residence located at 6727 Silvercrest Drive, Arlington, Texas. **Sean Nguyen** claimed to have located a buyer interested in purchasing L.P.'s residence for \$184,900.

88. On or about October 11, 2002, a person unknown to the Grand Jury prepared a fraudulent Uniform Residential Appraisal Report for 6727 Silvercrest Drive, Arlington, Texas, estimating the market value of that residence to be \$425,000.

89. In or about October 2002, **Xuyen Nguyen** recruited M.M. as a straw borrower to purchase 6727 Silvercrest Drive from L.P.

90. On or about October 24, 2002, M.M. and a person unknown to the Grand Jury executed fraudulent loan documents to be submitted to Countrywide Home Loans,

d.b.a. America's Wholesale Lender, for financing to close straw borrower M.M.'s purchase of 6727 Silvercrest Drive from L.P. for the inflated amount of \$425,000.

91. On or about October 24, 2002, **Tam Nguyen** obtained a Community Credit Union Cashier's Check in the amount of \$16,600.68, which was used as a portion of the down payment in closing the purchase of 6727 Silvercrest Drive. The funds for this Cashier's Check were obtained from K.H. and **Tam Nguyen's** personal account, maintained at Community Credit Union, account number \*\*\*\*\*0190.

92. On or about October 24, 2002, **Tam Nguyen** obtained a Washington Mutual Bank Cashier's Check in the amount of \$43,399.32, which was used as a portion of the down payment in closing the purchase of 6727 Silvercrest Drive.

93. On or about October 24, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused the fraudulent loan documents for the purchase of 6727 Silvercrest Drive to be submitted to Countrywide Home Loans, d.b.a. America's Wholesale Lender, seeking a loan in the amount of \$318,750.

94. On or about October 25, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused Countrywide Home Loans, d.b.a. America's Wholesale Lender, to fund and transmit by wire communication \$318,871.43 to American Title Company in order to close straw borrower M.M.'s purchase of 6727 Silvercrest Drive from L.P.

95. On or about October 25, 2002, **Sean Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused American Title Company to pay off the original mortgage on L.P.'s house, using a portion of the loan proceeds received from Countrywide Home Loans, d.b.a. America's Wholesale Lender, by sending a check via private and commercial carrier Federal Express in the amount of \$25,201.38 to Compass Bank in Birmingham, Alabama.

96. On or about October 25, 2002, **Tam Nguyen**, aided and assisted by other persons known and unknown to the Grand Jury, caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$104,000.00 to B. Yi, Inc., d.b.a. Simple-CMS', business account, maintained at Bank of America, account number \*\*\*\* \* 3084, such business being owned by **Tam Nguyen**.

97. On or about October 25, 2002, **Sean Nguyen** and **Myna Tran** caused American Title Company to transmit by wire communication excess loan proceeds in the amount of \$128,995.44 to **Myna Tran's** personal account, maintained at Bank One, account number \*\*\*\*\*6626.

98. On or about October 25, 2002, **Myna Tran** withdrew a portion of the loan proceeds deposited in her personal account by obtaining cashier's checks payable to: a) P.T. for \$31,500; b) A.T. for \$31,500; c) ABC for \$31,500; and d) ABC for \$31,500.

99. On or about January 30, 2004, **Sean Nguyen** deposited a check in the amount of \$87,345.73, such funds derived from the sale of the "ABC Market" building

owned by P.T. and A.T., into the Century Mortgage account, maintained at Bank One, account number \*\*\*\*\*5555.

100. As Overt Acts of this conspiracy, the Grand Jury adopts, realleges, and incorporates by reference herein the allegations set forth in Counts 2 through 44 of this Indictment.

In violation of 18 U.S.C. § 371 (18 U.S.C. §§ 1341, 1343 and 1957(a)).

Counts Two through Twenty-One  
Wire Fraud and Aiding and Abetting  
(Violations of 18 U.S.C. §§ 1343 and 2)

1. The Grand Jury realleges and incorporates by reference the allegations contained both in the Introduction section and Manner and Means portion of the conspiracy charge in Count One of this indictment, as if fully set forth herein.
  
2. On or about the dates set forth below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Sean Cung-Kim Nguyen**, also known as “Sean Cung Nguyen,” **Dai Quoc Nguyen**, **Xuyen Thi-Kim Nguyen**, also known as “Kim Xuyen Nguyen,” **Tam Nguyen**, **Myna Tran**, **Hong Thanh Duong**, and **Cuc Kim Tran**, aided and abetted by one another and by other persons known and unknown to the Grand Jury, with the intent to defraud and for the purpose of executing a scheme and artifice to defraud and to obtain money and property from Countrywide Home Loans, d.b.a. America’s Wholesale Lender, through materially false representations, specifically, fraudulent mortgage loan applications submitted by straw purchasers, did knowingly cause to be transmitted, in interstate commerce, by means of wire and radio communications, certain writings, signs, signals and sounds constituting a wire transfer of money and funds associated with the home mortgage transactions described below:

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendants</b>	<b>Residence</b>	<b>Amount of Wire Transfer</b>	<b>Origin of Wire Transfer</b>	<b>Wire Transfer Destination</b>
<b>2</b>	June 5, 2002	<b>Sean Nguyen, Dai Nguyen</b>	3349 Stoneway Drive, Grand Prairie, Texas	\$303,369.78	<i>Bank of New York, New York City, New York</i>	<i>Bank of America, Dallas, Texas (North American Title Company's account no. *****5039)</i>
<b>3</b>	June 6, 2002	<b>Sean Nguyen, Dai Nguyen</b>	3349 Stoneway Drive, Grand Prairie, Texas	\$149,055.47	<i>Bank of America, Dallas, Texas</i>	<i>Washington Mutual Bank, Seattle, Washington (Dai Nguyen's account no. *****5810)</i>
<b>4</b>	June 18, 2002	<b>Sean Nguyen, Dai Nguyen</b>	2727 Rolling Hills Lane, Dallas, Texas	\$323,915.37	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank, Houston, Texas (American Title Company's account no. *****2300)</i>
<b>5</b>	June 20, 2002	<b>Sean Nguyen, Dai Nguyen</b>	2727 Rolling Hills Lane, Dallas, Texas	\$153,619.21	<i>Compass Bank, Birmingham, Alabama</i>	<i>Washington Mutual Bank, Seattle, Washington (Dai Nguyen's account no. *****5810)</i>
<b>6</b>	June 25, 2002	<b>Sean Nguyen, Dai Nguyen, Tam Nguyen</b>	2304 Spenrock Ct., Lewisville, Texas	\$395,096.79	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank, Houston, Texas (American Title Company's account no. *****2300)</i>

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendants</b>	<b>Residence</b>	<b>Amount of Wire Transfer</b>	<b>Origin of Wire Transfer</b>	<b>Wire Transfer Destination</b>
7	June 26, 2002	<b>Sean Nguyen, Dai Nguyen, Tam Nguyen</b>	2304 Spenrock Ct., Lewisville, Texas	\$109,003.00	<i>Compass Bank,</i> Birmingham, Alabama	<i>Washington Mutual Bank,</i> Seattle, Washington ( <b>Dai Nguyen's</b> account no. *****5810)
8	June 26, 2002	<b>Sean Nguyen, Dai Nguyen, Tam Nguyen</b>	2304 Spenrock Ct., Lewisville, Texas	\$119,619.82	<i>Compass Bank,</i> Birmingham, Alabama	<i>Community Credit Union,</i> Plano, Texas ( <b>K.H. and Tam Nguyen's</b> account no. *****0190)
9	July 5, 2002	<b>Sean Nguyen, Dai Nguyen</b>	1901 Walnut Hill Drive, Rowlett, Texas	\$393,818.44	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank,</i> Houston, Texas ( <b>American Title Company's</b> account no. *****2300)
10	July 9, 2002	<b>Sean Nguyen, Dai Nguyen</b>	1901 Walnut Hill Drive, Rowlett, Texas	\$308,699.43	<i>Compass Bank,</i> Birmingham, Alabama	<i>Washington Mutual Bank,</i> Seattle, Washington ( <b>Dai Nguyen's</b> account no. *****5810)
11	July 22, 2002	<b>Sean Nguyen, Dai Nguyen, Tam Nguyen</b>	7605 Constitution, Plano, Texas	\$373,545.11	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank,</i> Houston, Texas ( <b>American Title Company's</b> account no. *****2300)

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendants</b>	<b>Residence</b>	<b>Amount of Wire Transfer</b>	<b>Origin of Wire Transfer</b>	<b>Wire Transfer Destination</b>
<b>12</b>	July 24, 2002	<b>Sean Nguyen, Dai Nguyen, Tam Nguyen</b>	7605 Constitution, Plano, Texas	\$203,180.33	<i>Compass Bank,</i> Birmingham, Alabama	<i>Washington Mutual Bank,</i> Seattle, Washington ( <b>Dai Nguyen's</b> account no. *****5810)
<b>13</b>	August 2, 2002	<b>Sean Nguyen, Dai Nguyen, Xuyen Nguyen, Tam Nguyen, Hong Duong</b>	421 Ivan Drive, Lewisville, Texas	\$372,683.24	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank,</i> Houston, Texas (American Title Company's account no. *****2300)
<b>14</b>	August 2, 2002	<b>Sean Nguyen, Dai Nguyen, Xuyen Nguyen, Tam Nguyen, Hong Duong</b>	421 Ivan Drive, Lewisville, Texas	\$212,200.76	<i>Compass Bank,</i> Birmingham, Alabama	<i>Washington Mutual Bank,</i> Seattle, Washington ( <b>Dai Nguyen's</b> account no. *****5810)
<b>15</b>	August 7, 2002	<b>Sean Nguyen, Dai Nguyen, Xuyen Nguyen, Tam Nguyen, Cuc Tran</b>	4010 Ridgecrest Tr., Carrollton, Texas	\$326,618.63	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank,</i> Houston, Texas (American Title Company's account no. *****2300)
<b>16</b>	August 7, 2002	<b>Sean Nguyen, Dai Nguyen, Xuyen Nguyen, Tam Nguyen, Cuc Tran</b>	4010 Ridgecrest Tr., Carrollton, Texas	\$146,436.65	<i>Compass Bank,</i> Birmingham, Alabama	<i>Washington Mutual Bank,</i> Seattle, Washington ( <b>Dai Nguyen's</b> account no. *****5810)

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendants</b>	<b>Residence</b>	<b>Amount of Wire Transfer</b>	<b>Origin of Wire Transfer</b>	<b>Wire Transfer Destination</b>
17	October 3, 2002	<b>Sean Nguyen, Myna Tran</b>	6319 Fox Hunt Dr., Arlington, Texas	\$391,299.72	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank, Houston, Texas (American Title Company's account no. *****2300)</i>
18	October 3, 2002	<b>Sean Nguyen, Myna Tran</b>	6319 Fox Hunt Dr., Arlington, Texas	\$225,037.77	<i>Compass Bank, Birmingham, Alabama</i>	<i>Bank One, Dallas, Texas (A.N.'s account no. *****9283)</i>
19	October 25, 2002	<b>Sean Nguyen, Xuyen Nguyen, Tam Nguyen, Myna Tran</b>	6727 Silvercrest Dr., Arlington, Texas	\$318,871.43	<i>Bank of New York, New York City, New York</i>	<i>Compass Bank, Houston, Texas (American Title Company's account no. *****2300)</i>
20	October 25, 2002	<b>Sean Nguyen, Xuyen Nguyen, Tam Nguyen, Myna Tran</b>	6727 Silvercrest Dr., Arlington, Texas	\$104,000.00	<i>Compass Bank, Birmingham, Alabama</i>	<i>Bank of America, Dallas, Texas (B. Yi., Inc. d.b.a. Simple-CMS' account no. **** * 3084</i>
21	October 25, 2002	<b>Sean Nguyen, Xuyen Nguyen, Tam Nguyen, Myna Tran</b>	6727 Silvercrest Dr., Arlington, Texas	\$128,995.44	<i>Compass Bank, Birmingham, Alabama</i>	<i>Bank One, Dallas, Texas (Myna Tran's account no. *****6626)</i>

All in violation of 18 U.S.C. §§ 1343 and 2.

Count Twenty-Two through Twenty-Five  
Mail Fraud and Aiding and Abetting  
(Violations of 18 U.S.C. §§ 1341 and 2)

1. The Grand Jury realleges and incorporates by reference the allegations contained both in the Introduction section and Manner and Means portion of the conspiracy charge in Count One of this indictment, as if fully set forth herein.
  
2. On or about the dates set forth below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Sean Cung-Kim Nguyen**, also known as “Sean Cung Nguyen,” **Dai Quoc Nguyen**, **Xuyen Thi-Kim Nguyen**, also known as “Kim Xuyen Nguyen,” **Tam Nguyen**, **Myna Tran**, and **Hong Thanh Duong**, aided and abetted by one another and by other persons known and unknown to the Grand Jury, with intent to defraud and for the purpose of executing a scheme and artifice to defraud and to obtain money and property from Countrywide Home Loans, d.b.a. America’s Wholesale Lender, through materially false representations, specifically, fraudulent mortgage loan applications submitted by straw purchasers, did knowingly cause to be deposited matters and things, to wit, the loan payoff proceeds required for satisfying original mortgages in connection with closing proceedings on targeted residences, to be sent and delivered by Federal Express, a private and commercial interstate carrier, in the manner described below:

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendants</b>	<b>Residence</b>	<b>Amount of Money Sent</b>	<b>Origin of Federal Express Package</b>	<b>Federal Express Package Destination</b>
<b>22</b>	June 20, 2002	<b>Sean Nguyen, Dai Nguyen</b>	2727 Rolling Hills Lane, Dallas, Texas	\$188,644.94	<i>American Title Company, Garland, Texas</i>	<i>Bank of America, Getzville, New York</i>
<b>23</b>	July 24, 2002	<b>Sean Nguyen, Dai Nguyen</b>	7605 Constitution, Plano, Texas	\$46,491.62	<i>American Title Company, Garland, Texas</i>	<i>Chase Manhattan Mortgage Corp., Columbus, Ohio</i>
<b>24</b>	August 2, 2002	<b>Sean Nguyen, Dai Nguyen, Xuyen Nguyen, Tam Nguyen, Hong Duong</b>	421 Ivan Drive, Lewisville, Texas	\$101,974.23	<i>American Title Company, Garland, Texas</i>	<i>Wells Fargo Home Mortgage, Des Moines, Iowa</i>
<b>25</b>	October 25, 2002	<b>Sean Nguyen, Xuyen Nguyen, Tam Nguyen, Myna Tran</b>	6727 Silvercrest Dr., Arlington, Texas	\$25,201.38	<i>American Title Company, Garland, Texas</i>	<i>Compass Bank, Birmingham, Alabama</i>

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

Counts Twenty-Six through Forty-Four  
Engaging in Monetary Transaction in Property  
Derived From Specified Unlawful Activity  
(Violations of 18 U.S.C. § 1957(a) and 2)

On or about the dates set forth below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Sean Cung-Kim Nguyen**, also known as “Sean Cung Nguyen,” **Dai Quoc Nguyen**, **Tam Nguyen**, and **Myna Tran**, aided and abetted by one another and by other persons known and unknown to the Grand Jury, did knowingly engage in and attempt to engage in monetary transactions by, through, and to financial institutions, affecting interstate commerce, involving criminally derived property of a value greater than \$10,000, derived from specified unlawful activities, namely wire fraud, in violation of 18 U.S.C. § 1343, each such transaction set out below constituting a separate count of this Indictment:

<b>Count</b>	<b>Date (on or about)</b>	<b>Amount of Transaction</b>	<b>Description of Transaction</b>
<b>26</b>	June 6, 2002	\$50,000.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier’s check number 589527821 payable to <b>Sean Nguyen</b> using funds from the sale of 3349 Stoneway Drive, Grand Prairie, Texas.
<b>27</b>	June 27, 2002	\$30,000.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier’s check number 589527903 payable to “Century Mortgage” using funds from the sale of 2304 Spenrock Court, Lewisville, Texas.
<b>28</b>	June 27, 2002	\$31,500.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier’s check number 589527904 payable to “Century Mortgage” using funds from the sale of 2304 Spenrock Court, Lewisville, Texas.

<b>Count</b>	<b>Date (on or about)</b>	<b>Amount of Transaction</b>	<b>Description of Transaction</b>
<b>29</b>	June 27, 2002	\$30,000.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier's check number 589527901 payable to "UC Financial" using funds from the sale of 2304 Spenrock Court, Lewisville, Texas.
<b>30</b>	June 28, 2002	\$10,400.00	Defendant <b>Tam Nguyen</b> , aided and assisted by K.H., purchased Community Credit Union cashier's check number 299171 payable to <b>Sean Nguyen</b> using funds from the sale of 2304 Spenrock Court, Lewisville, Texas.
<b>31</b>	June 28, 2002	\$10,400.00	Defendant <b>Sean Nguyen</b> deposited Community Credit Union cashier's check number 299171 (referenced in Count 30) into Wells Fargo Bank account number *****0237.
<b>32</b>	June 28, 2002	\$10,400.00	Defendant <b>Tam Nguyen</b> , aided and assisted by K.H., purchased Community Credit Union cashier's check number 299172 payable to <b>Sean Nguyen</b> using funds from the sale of 2304 Spenrock Court, Lewisville, Texas.
<b>33</b>	June 28, 2002	\$10,400.00	Defendant <b>Sean Nguyen</b> deposited Community Credit Union cashier's check number 299172 (referenced in Count 32) into Wells Fargo Bank account number *****8701.
<b>34</b>	July 9, 2002	\$40,000.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier's check number 589527959 payable to <b>Sean Nguyen</b> using funds from the sale of 1901 Walnut Hill Drive, Rowlett, Texas.
<b>35</b>	July 9, 2002	\$40,000.00	Defendant <b>Sean Nguyen</b> deposited Washington Mutual Bank cashier's check number 589527959 (referenced in Count 34) into Wells Fargo Bank account number *****8701.
<b>36</b>	July 24, 2002	\$36,290.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier's check number 589528015 payable to <b>Sean Nguyen</b> using funds from the sale of 7605 Constitution, Plano, Texas.
<b>37</b>	July 24, 2002	\$36,290.00	Defendant <b>Sean Nguyen</b> deposited Washington Mutual Bank cashier's check number 589528015 (referenced in Count 36) into Bank One account number *****5555.

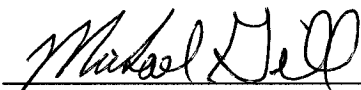
<b>Count</b>	<b>Date (on or about)</b>	<b>Amount of Transaction</b>	<b>Description of Transaction</b>
<b>38</b>	July 24, 2002	\$30,000.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier's check number 589528013 payable to <b>Tam Nguyen</b> using funds from the sale of 7605 Constitution, Plano, Texas.
<b>39</b>	August 1, 2002	\$30,000.00	Defendant <b>Tam Nguyen</b> deposited Washington Mutual Bank cashier's check number 589528013 (referenced in Count 38) into Community Credit Union account number *****0190.
<b>40</b>	July 24, 2002	\$36,290.00	Defendant <b>Dai Nguyen</b> purchased Washington Mutual Bank cashier's check number 589528016 payable to <b>Sean Nguyen</b> using funds from the sale of 7605 Constitution, Plano, Texas.
<b>41</b>	August 1, 2002	\$36,290.00	Defendant <b>Sean Nguyen</b> deposited Washington Mutual Bank cashier's check number 589528016 (referenced in Count 40) into Wells Fargo Bank account number *****0237.
<b>42</b>	October 3, 2002	\$21,000.00	Defendant <b>Myna Tran</b> , aided and assisted by A.N., purchased Bank One cashier's check number 559801904 payable to A.D. using funds from the sale of 6319 Fox Hunt Drive, Arlington, Texas.
<b>43</b>	October 9, 2002	\$21,000.00	Defendant <b>Sean Nguyen</b> deposited Bank One cashier's check number 549801904 (referenced in Count 42) into Bank One account number *****5555.
<b>44</b>	October 25, 2002	\$31,500.00	Defendant <b>Myna Tran</b> purchased Bank One cashier's check number 924472819 payable to P.T. using funds from the sale of 6727 Silvercrest Drive, Arlington, Texas.

All in violation of 18 U.S.C. §§ 1957(a) and 2.



A TRUE BILL

RICHARD B. ROPER  
UNITED STATES ATTORNEY



MICHAEL R. GILL

Assistant United States Attorney  
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Dallas, Texas 75242  
Telephone: 214.659.8600  
Facsimile: 214.659.8803

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment:  Yes  No      New Defendant:  Yes  No

Pending CR Case in NDTX:  Yes  No      If Yes, number: \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20 from District of **3 05 CR 0124 - M**

Magistrate Case Number \_\_\_\_\_

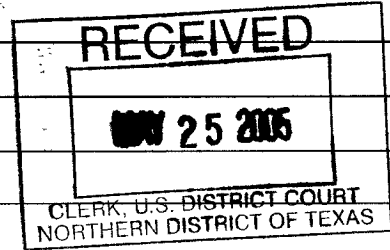
**1. Defendant Information**

Juvenile:  Yes  No  
 If Yes, Matter to be sealed:  
 Yes  No

Defendant Name SEAN CUNG-KIM NGUYEN (01)

Alias Name a/k/a Sean Cung Nguyen

Address \_\_\_\_\_



County in which offense was committed: Dallas

**2. U.S. Attorney Information**

AUSA MICHAEL R. GILL

Bar # Texas Bar # 24002138

**3. Interpreter**

Yes  No      If Yes, list language and/or dialect:

**4. Location Status**

Arrest Date: Issue Arrest Warrant

Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 37       Petty       Misdemeanor       Felony

Citation	Description of Offense Charged	Count(s)
Title 18 U.S.C. §371 [18 U.S.C. §§ 1341, 1343 and 1957(a)]	Conspiracy to Commit Mail Fraud Wire Fraud, and Illegal Monetary Transactions	1
Title 18 U.S.C. §§ 1343 and 2	Wire Fraud and Aiding and Abetting	2-21
Title 18 U.S.C. §§ 1341 and 2	Mail Fraud and Aiding and Abetting	22-25
Title 18 U.S.C. § 1957(a) and 2	Engaging in Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting	26, 30-37 40-41, 43

Date : May 24, 2005

Signature of AUSA: Michael R. Gill  
**MICHAEL R. GILL**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment:  Yes  No    New Defendant:  Yes  No  
 Pending CR Case in NDTX:  Yes  No    If Yes, number: \_\_\_\_\_  
 Search Warrant Case Number **3 05 CR 0124 - M**  
 R 20 from District of \_\_\_\_\_  
 Magistrate Case Number \_\_\_\_\_

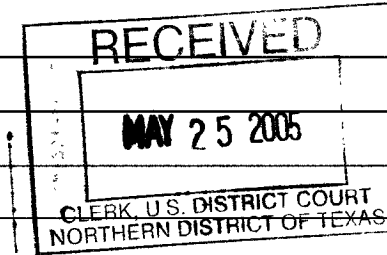
**1. Defendant Information**

Juvenile:  Yes  No  
 If Yes, Matter to be sealed:  
 Yes  No

Defendant Name DAI QUOC NGUYEN (02)

Alias Name \_\_\_\_\_

Address \_\_\_\_\_



County in which offense was committed: Dallas

**2. U.S. Attorney Information**

AUSA MICHAEL R. GILL

Bar # Texas Bar # 24002138

**3. Interpreter**

Yes  No    If Yes, list language and/or dialect:

**4. Location Status**

Arrest Date: Issue Arrest Warrant

Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 27     Petty     Misdemeanor     Felony

Citation	Description of Offense Charged	Count(s)
Title 18 U.S.C. §371 [18 U.S.C. §§ 1341, 1343 and 1957(a)]	Conspiracy to Commit Mail Fraud Wire Fraud, and Illegal Monetary Transactions	1
Title 18 U.S.C. §§ 1343 and 2	Wire Fraud and Aiding and Abetting	2-16
Title 18 U.S.C. §§ 1341 and 2	Mail Fraud and Aiding and Abetting	22-24
Title 18 U.S.C. § 1957(a) and 2	Engaging in Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting	26-29, 34, 36, 38, 40

Date : May 24, 2005

Signature of AUSA: \_\_\_\_\_

*Michael R. Gill*

**MICHAEL R. GILL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment:  Yes  No New Defendant:  Yes  No  
Pending CR Case in NDTX:  Yes  No If Yes, number: \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20 from District of \_\_\_\_\_  
Magistrate Case Number **3 0 5 C R 0 1 2 4 - M**

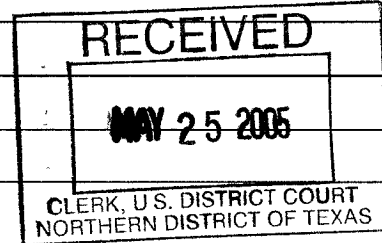
1. Defendant Information

Juvenile:  Yes  No  
If Yes, Matter to be sealed:  
 Yes  No

Defendant Name XUYEN THI-KIM NGUYEN (03)

Alias Name a/k/a Kim Xuyen Nguyen

Address \_\_\_\_\_



County in which offense was committed: Dallas

2. U.S. Attorney Information

AUSA MICHAEL R. GILL

Bar # Texas Bar # 24002138

3. Interpreter

Yes  No If Yes, list language and/or dialect:

4. Location Status

Arrest Date: Issue Arrest Warrant

Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 10  Petty  Misdemeanor  Felony

Citation	Description of Offense Charged	Count(s)
Title 18 U.S.C. §371 [18 U.S.C. §§ 1341, 1343 and 1957(a)]	Conspiracy to Commit Mail Fraud Wire Fraud, and Illegal Monetary Transactions	1
Title 18 U.S.C. §§ 1343 and 2	Wire Fraud and Aiding and Abetting	13-16, 19-21
Title 18 U.S.C. §§ 1341 and 2	Mail Fraud and Aiding and Abetting	24-25

Date: May 24, 2005

Signature of AUSA:

Michael R. Gill  
**MICHAEL R. GILL**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment:  Yes  No      New Defendant:  Yes  No

Pending CR Case in NDTX:  Yes  No      If Yes, number: \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20 from District of **3 0 5 C R 0 1 2 4 - M**

Magistrate Case Number \_\_\_\_\_

**1. Defendant Information**

Juvenile:  Yes  No

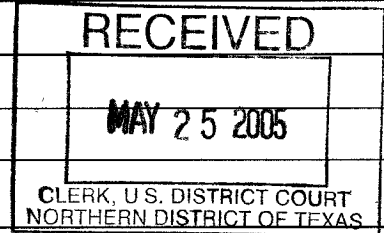
If Yes, Matter to be sealed:  
 Yes  No

Defendant Name TAM NGUYEN (04)

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

County in which offense was committed: Dallas



**2. U.S. Attorney Information**

AUSA MICHAEL R. GILL

Bar # Texas Bar # 24002138

**3. Interpreter**

Yes  No      If Yes, list language and/or dialect:

**4. Location Status**

Arrest Date: Issue Arrest Warrant

Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_

Already in State Custody

On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 19       Petty       Misdemeanor       Felony

Citation	Description of Offense Charged	Count(s)
Title 18 U.S.C. §371 [18 U.S.C. §§ 1341, 1343 and 1957(a)]	Conspiracy to Commit Mail Fraud Wire Fraud, and Illegal Monetary Transactions	1
Title 18 U.S.C. §§ 1343 and 2	Wire Fraud and Aiding and Abetting	6-8, 11-16, 19-21
Title 18 U.S.C. §§ 1341 and 2	Mail Fraud and Aiding and Abetting	24-25
Title 18 U.S.C. § 1957(a) and 2	Engaging in Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting	30, 32, 38-39

Date : May 24, 2005

Signature of AUSA: *Michael R. Gill*  
**MICHAEL R. GILL**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment:  Yes  No      New Defendant:  Yes  No

Pending CR Case in NDTX:  Yes  No      If Yes, number: \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20 from District of 3 05 CR 0124 - M

Magistrate Case Number \_\_\_\_\_

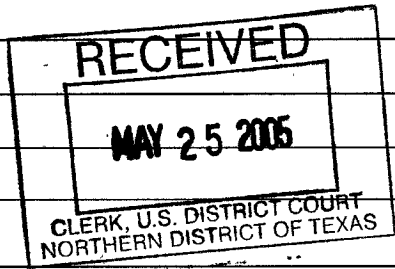
**1. Defendant Information**

Juvenile:  Yes  No  
 If Yes, Matter to be sealed:  
 Yes  No

Defendant Name MYNA TRAN (05)

Alias Name \_\_\_\_\_

Address \_\_\_\_\_



County in which offense was committed: Dallas

**2. U.S. Attorney Information**

AUSA MICHAEL R. GILL

Bar # Texas Bar # 24002138

**3. Interpreter**

Yes  No      If Yes, list language and/or dialect:

**4. Location Status**

Arrest Date: Issue Arrest Warrant

Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 9       Petty       Misdemeanor       Felony

Citation	Description of Offense Charged	Count(s)
Title 18 U.S.C. §371 [18 U.S.C. §§ 1341, 1343 and 1957(a)]	Conspiracy to Commit Mail Fraud Wire Fraud, and Illegal Monetary Transactions	1
Title 18 U.S.C. §§ 1343 and 2	Wire Fraud and Aiding and Abetting	17-21
Title 18 U.S.C. §§ 1341 and 2	Mail Fraud and Aiding and Abetting	25
Title 18 U.S.C. § 1957(a) and 2	Engaging in Monetary Transaction in Property Derived from Specified Unlawful Activity and Aiding and Abetting	42, 44

Date : May 24, 2005

Signature of AUSA: *Michael R. Gill*  
**MICHAEL R. GILL**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment:  Yes  No      New Defendant:  Yes  No

Pending CR Case in NDTX:  Yes  No      If Yes, number: \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20 from District of **3 05 CR 0124 - M**

Magistrate Case Number \_\_\_\_\_

**1. Defendant Information**

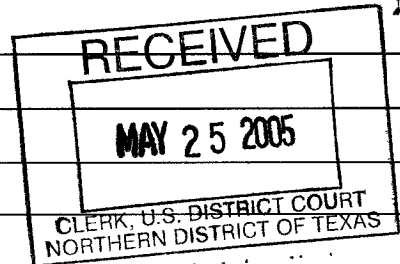
Juvenile:  Yes  No

If Yes, Matter to be sealed:  
 Yes  No

Defendant Name HONG THANH DUONG (06)

Alias Name \_\_\_\_\_

Address \_\_\_\_\_



County in which offense was committed: Dallas

**2. U.S. Attorney Information**

AUSA MICHAEL R. GILL

Bar # Texas Bar # 24002138

**3. Interpreter**

Yes  No      If Yes, list language and/or dialect:

**4. Location Status**

Arrest Date: Issue Arrest Warrant

Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_

Already in State Custody

On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 4       Petty       Misdemeanor       Felony

Citation	Description of Offense Charged	Count(s)
Title 18 U.S.C. §371 [18 U.S.C. §§ 1341, 1343 and 1957(a)]	Conspiracy to Commit Mail Fraud Wire Fraud, and Illegal Monetary Transactions	1
Title 18 U.S.C. §§ 1343 and 2	Wire Fraud and Aiding and Abetting	13, 14
Title 18 U.S.C. §§ 1341 and 2	Mail Fraud and Aiding and Abetting	24

Date : May 24, 2005

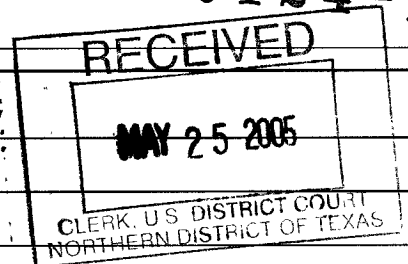
Signature of AUSA: *Michael R. Gill*

**MICHAEL R. GILL**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment:  Yes  No    New Defendant:  Yes  No  
Pending CR Case in NDTX:  Yes  No    If Yes, number: \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20 from District of 3 05 CR 0124-M  
Magistrate Case Number \_\_\_\_\_



**1. Defendant Information**

Juvenile:  Yes  No  
If Yes, Matter to be sealed:  
 Yes  No

Defendant Name CUC KIM TRAN (07)

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

County in which offense was committed: Dallas

**2. U.S. Attorney Information**

AUSA MICHAEL R. GILL

Bar # Texas Bar # 24002138

**3. Interpreter**

Yes  No    If Yes, list language and/or dialect:

**4. Location Status**

Arrest Date: Issue Arrest Warrant

Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 3     Petty     Misdemeanor     Felony

Citation	Description of Offense Charged	Count(s)
Title 18 U.S.C. §371 [18 U.S.C. §§ 1341, 1343 and 1957(a)]	Conspiracy to Commit Mail Fraud Wire Fraud, and Illegal Monetary Transactions	1
Title 18 U.S.C. §§ 1343 and 2	Wire Fraud and Aiding and Abetting	15-16

Date : May 24, 2005

Signature of AUSA: *Michael R. Gill*

**MICHAEL R. GILL**