

3. The IRC and associated regulations required individuals to yearly file individual income tax returns (“Forms 1040”), wherein they were required to accurately and truthfully report all income earned during a given year. On these forms, individuals were allowed to claim credits against their tax liability for taxes withheld from their income.

B. The Defendants and Their Businesses

4. At all times relevant to this Second Superseding Indictment, defendants **MINH-VU HOANG** and **THANH HOANG** were married and resided at 9101 Clewerwall Drive, Bethesda, Maryland.

5. At all times relevant to this Second Superseding Indictment, defendant **VAN THANH VU, a/k/a Van Thi Vu, a/k/a Van T Vu (“VAN THANH VU”)**, was defendant **MINH-VU HOANG**’s sister and resided at 6800 Loch Lomond Drive, Bethesda, Maryland.

6. At various times relevant to this Second Superseding Indictment, defendant **HAI DUC NGO** was the ex-husband of defendant **VAN THANH VU** and resided in Virginia.

7. Foreclosure is the legal proceeding in which a bank or other secured creditor (“the lender”) sells or repossesses a parcel of real property originally purchased by a buyer (“the borrower”) because of the borrower’s failure to comply with an agreement between the lender and borrower called a “mortgage” or “deed of trust.” In one form of foreclosure proceeding generally used in Maryland, the property is exposed to auction by a Trustee (the “foreclosure Trustee”) or other person appointed by a court for that purpose. The winning bidder at auction becomes the purchaser of the property. In that capacity, the winning bidder is typically required to provide a substantial deposit to the foreclosure Trustee at the time of the auction and must settle on the property within a short period of time, after the purchase is ratified by the court.

8. **MINH-VU HOANG** and **THANH HOANG** purchased real property at foreclosure auctions (“foreclosure properties”) and subsequently resold certain of these foreclosure properties at a profit. At various times relevant to this Second Superseding Indictment, **MINH-VU HOANG, THANH HOANG, VAN THANH VU, HAI DUC NGO** and known and unknown coconspirators caused the formation of and utilized numerous business entities, including general partnerships (“GP”), limited liability corporations (“LLC”), and limited partnerships (“LP”), to conduct real estate transactions related to the purchase and sale of foreclosure properties. These entities included the following:

a. MINBILT Realty, Inc.: On or about September 9, 1994, **MINH-VU HOANG** formed MINBILT Realty, Inc., a Maryland corporation with offices located at 9101 Clewerwall Drive, Bethesda, Maryland. At various times relevant to this Second Superseding Indictment, **MINH-VU HOANG** was president and registered agent, **THANH HOANG** was secretary and **VAN THANH VU** was acting treasurer/secretary of MINBILT Realty, Inc.

b. Segal GP: On or about July 10, 1999, **MINH-VU HOANG** and **THANH HOANG** formed Segal GP. The partnership agreement provided for **MINH-VU HOANG** and **THANH HOANG** to share equally all profits from the sale of properties made by Segal GP.

c. Isbell GP (a/k/a Isabel GP): On or about February 1, 2001, **MINH-VU HOANG** and **THANH HOANG** formed Isbell GP. The partnership agreement provided for **MINH-VU HOANG** and **THANH HOANG** to share equally all profits from the sale of properties made by Isbell GP. On or about February 3, 2001, **MINH-VU HOANG** and **THANH HOANG** formed Isabel GP. The partnership agreement provided for **MINH-VU HOANG** and **THANH HOANG** to share equally all profits from the sale of properties made by

Isabel GP. On or about January 7, 2002, **MINH-VU HOANG** and **THANH HOANG** again established Isbell GP. The partnership agreement was notarized by **VAN THANH VU** and provided for **MINH-VU HOANG** and **THANH HOANG** to share equally all profits from the sale of properties made by Isbell GP.

d. Pool GP: On or about January 2, 2002, **MINH-VU HOANG** and **THANH HOANG** formed Pool GP. The partnership agreement provided for **MINH-VU HOANG** and **THANH HOANG** to share equally all profits from the sale of properties made by Pool GP. On or about January 2, 2003, **MINH-VU HOANG**, **VAN THANH VU** and P.H. formed Pool GP and shared in profits from the sale of properties made by Pool GP.

e. Lamberton LP: On or about January 1, 2003, **VAN THANH VU** and H.V. formed Lamberton LP. The partnership agreement provided for **VAN THANH VU** and H.V. to share equally in profits from the sale of properties made by Lamberton LP. On or about August 1, 2003, **MINH-VU HOANG** and **THANH HOANG** formed Lamberton LP. The partnership agreement designated **MINH-VU HOANG** as vice-president and **THANH HOANG** as president and treasurer but did not set out the relative ownership interests of **MINH-VU HOANG** and **THANH HOANG**.

f. Phamin GP: On or about January 2, 2003, **MINH-VU HOANG** and **THANH HOANG** executed an agreement that formed Phamin GP, with each contributing 50 percent of the capital and each receiving 50 percent of the profit or loss. On or about April 4, 2005, **MINH-VU HOANG** and **THANH HOANG** executed a separate partnership resolution in the name of Phamin GP for the sale of 14007 Reverend Boucher Place, Upper Marlboro, Maryland, agreeing to split the proceeds from the sale equally. On or about April 12, 2005,

MINH-VU HOANG and **THANH HOANG** executed a document called a “Certificate of Incumbancy” [sic] reaffirming the existence of Phamin GP.

g. Cybele GP (a/k/a Cybella GP): On or about May 1, 2003, **THANH HOANG** executed an agreement that formed Cybele GP as 100 percent owner. On or about January 1, 2004, **MINH-VU HOANG** and **VAN THANH VU** executed a separate agreement that re-formed Cybele GP as their partnership, with each owning 50 percent.

h. Pacific Rim GP: On or about November 1, 2003, **VAN THANH VU** and H.V. formed Pacific Rim GP. At various times relevant to this Second Superseding Indictment, **VAN THANH VU** provided 50 percent of the capital contribution to Pacific Rim GP and shared in profits from the sale of properties made by Pacific Rim GP.

i. MU GP: On or about April 1, 2004, **VAN THANH VU** and **MINH-VU HOANG** formed MU GP, with **VAN THANH VU** to receive 90 percent of the profit or loss, and **MINH-VU HOANG** to receive 10 percent. On or about May 12, 2005, **VAN THANH VU** and **MINH-VU HOANG** executed a separate partnership agreement under the name of MU GP, for the purpose of selling the property located at 6015 Wesson Drive, Suitland, Maryland. On or about May 12, 2005, **MINH-VU HOANG** and **THANH HOANG** executed a document called a “Certificate of Incumbancy” [sic] reaffirming the existence of MU GP.

j. Bay GP: On or about April 26, 2005, E.P. and A.L. formed Bay GP, allegedly in connection with the purchase of property located at 5955 Hil Mar Drive, District Heights, Maryland. On or about April 29, 2005, **MINH-VU HOANG** created a partnership agreement identifying **MINH-VU HOANG**'s son as the sole partner for Bay GP “t/a Rocky LLC” in connection with the purchase of 1212 Chapelwood Lane, Capitol Heights, Maryland.

k. Madison Plus LLC: On or about June 5, 2005, **VAN THANH VU** formed Madison Plus LLC. At all times relevant to this Second Superseding Indictment, **VAN THANH VU** was registered agent of Madison Plus LLC, and on or about July 2, 2005 opened and retained exclusive signature authority for SunTrust Bank account no.1000032420977 in the name of Madison Plus LLC (“the Madison Plus LLC account”).

l. Arundel Garden GP: On or about June 28, 2005, **HAI DUC NGO** and Coconspirator A formed Arundel Garden General Partnership (“Arundel Garden GP”). Pursuant to a written partnership agreement, **HAI DUC NGO** provided 100 percent of the loans and received 99 percent of the profits. Coconspirator A provided services in exchange for 1 percent of the profits.

m. MVHP LLC: On or about November 1, 2005, **MINH-VU HOANG** organized and caused to be organized MVHP LLC. On or about December 12, 2005, **MINH-VU HOANG** and others set up an Operating Agreement, under which **MINH-VU HOANG** was authorized to sign settlement documents on behalf of MVHP LLC. **MINH-VU HOANG** also was the sole signator for United Bank account no. 0070022157 in the name of MVHP LLC.

n. Homestead Funding GP: On or about January 7, 2006 **MINH-VU HOANG** formed and caused to be formed Homestead Funding GP. The partnership agreement sets forth that **MINH-VU HOANG** would provide 100 percent of the loans and Coconspirator A would provide “services.” The partnership agreement further set forth that **MINH-VU HOANG** was authorized to sign necessary real estate documents and “direct distribution ... [of] all funds at settlement.” Under the partnership agreement, 1 percent of the profit was to be provided to

MINH-VU HOANG, 1 percent to Coconspirator A and 98 percent to Homestead Funding GP.

o. Sibelius LLC: On or about February 7, 2006, **MINH-VU HOANG** and Coconspirator A organized Sibelius LLC. The principal office was located at 9101 Clewerwall Drive, Bethesda, Maryland.

9. At various times relevant to this Second Superseding Indictment, **MINH-VU HOANG** and **THANH HOANG** used Gemini Title & Escrow LLC (“Gemini”) to conduct settlements on the foreclosure properties they purchased and sold. Gemini was owned by a settlement attorney whose offices were located in Bethesda, Maryland (“the Bethesda settlement attorney”). Gemini established SunTrust bank account number 1000014598857 in the name of the Bethesda settlement attorney, for the benefit of **MINH-VU HOANG** and **THANH HOANG**, which **MINH-VU HOANG** and **THANH HOANG** used for the deposit and withdrawal of funds for the purchase and sale of properties (“the **HOANG** escrow account”). The **HOANG** escrow account was utilized by **MINH-VU HOANG** and **THANH HOANG** to transfer money from the account to, among others, GPs, LPs and LLCs which they controlled, in order to conceal their financial interests in the purchase and sale of those foreclosure properties

The Conspiracy and Its Objects

10. Beginning in or about January 2000 and continuing through in or about April 2006, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG, and
THANH HOANG,**

knowingly and willfully combined, conspired, confederated and agreed with each other and others known and unknown to the Grand Jury to defraud the United States by impeding, impairing, obstructing, and defeating the lawful functions of the IRS in the ascertainment,

computation, assessment, and collection of income taxes.

Manner and Means of the Conspiracy

The manner and means of committing the conspiracy included the following:

11. **MINH-VU HOANG** and **THANH HOANG** purchased and sold hundreds of foreclosure properties during tax years 2000 to 2005.
12. **MINH-VU HOANG** and **THANH HOANG** used the names of their agents, their entities, and other nominees on certain documents related to the purchase of foreclosure properties.
13. **MINH-VU HOANG** and **THANH HOANG** recycled the names of partnerships and limited liability companies, often reforming the same company with different partners or different asset allocations to conceal their involvement in the purchase and sale of foreclosure properties.
14. **MINH-VU HOANG** and **THANH HOANG** concealed proceeds from the sale of foreclosure properties by using alter ego GPs, LPs and LLCs as the “sellers.”
15. In order to conceal the sale of their foreclosure properties and their corresponding income, **MINH-VU HOANG** and **THANH HOANG** transferred foreclosure properties to “substitute purchasers,” typically before the final foreclosure sale took place, which resulted in public records showing the foreclosed owner selling the property directly to the substitute purchaser, rather than to **MINH-VU HOANG** and **THANH HOANG**.
16. **MINH-VU HOANG** and **THANH HOANG** executed fraudulent HUD-1 forms related to the sale of foreclosure properties during tax years 2000 to 2005.
17. **MINH-VU HOANG** and **THANH HOANG** earned substantial profits from the

sale of foreclosure properties during tax years 2000 to 2005.

18. **MINH-VU HOANG** and **THANH HOANG** concealed their income from the IRS by not filing income tax returns with the IRS for tax years 2000, 2001, 2002, 2003, 2004 and 2005.

Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, **MINH-VU HOANG** and **THANH HOANG** committed and caused to be committed at least one of the following acts, among others, in the District of Maryland and elsewhere:

A. 1701 Pasture Brook Way, Potomac, Maryland

A1. On or about March 29, 2000, **THANH HOANG** purchased property located at 1701 Pasture Brook Way, Potomac, Maryland (“1701 Pasture Brook Way”).

A2. On or about August 9, 2000, **THANH HOANG** caused X.Q. and Z.F. to be substituted on foreclosure forms as the purchasers of 1701 Pasture Brook Way.

A3. On or about August 9, 2000, **THANH HOANG** sold 1701 Pasture Brook Way, resulting in a net profit of approximately \$98,179.02.

B. 6508 Eastern Avenue NE, Washington, D.C.

B1. On or about May 8, 2001, **MINH-VU HOANG** and **THANH HOANG** purchased property located at 6508 Eastern Avenue NE, Washington, D.C. (“6508 Eastern Avenue”).

B2. On or about September 26, 2001, **MINH-VU HOANG** and **THANH HOANG** sold 6508 Eastern Avenue, resulting in a net profit of approximately \$68,876.

C. 11506 Allview Drive, Beltsville, Maryland

C1. On or about June 11, 2003, Segal GP, by **MINH-VU HOANG**, purchased the property located at 11506 Allview Drive, Beltsville, Maryland (“11506 Allview Drive”).

C2. On or about November 7, 2003, **MINH-VU HOANG** caused J.A. and M.A. to be substituted for Segal GP on foreclosure forms as the purchasers of 11506 Allview Drive.

C3. On or about November 14, 2003, 11506 Allview Drive was sold, with the net profit on the sale of \$15,371 distributed to Segal GP and **MINH-VU HOANG** and **THANH HOANG**.

C4. On or about November 14, 2003, proceeds from the sale of 11506 Allview Drive were deposited directly into the **HOANG** escrow account.

D. 2603 Sheraton Street, Silver Spring, Maryland

D1. On or about January 21, 2003, **THANH HOANG** purchased the property located at 2603 Sheraton Street, Silver Spring, Maryland (“2603 Sheraton Street”).

D2. On or about March 27, 2003, “Isbell Partnership by **MINH-VU HOANG** (seller),” as specified in the general addendum to the sales contract, sold 2603 Sheraton Street, resulting in a net profit for **MINH-VU HOANG** and **THANH HOANG** of approximately \$182,550.

E. 16312 Boswell Place, Upper Marlboro, Maryland

E1. On or about March 24, 2003, **THANH HOANG** purchased the property located at 16312 Boswell Place, Upper Marlboro, Maryland (“16312 Boswell Place”) for approximately \$185,173.

E2. On or about January 28, 2004, **THANH HOANG** sold 16312 Boswell Place for

approximately \$304,305, resulting in a net profit on the sale of approximately \$89,802.

F. 4629 Governor Kent Court, Upper Marlboro, Maryland

F1. On or about July 7, 2004, Segal GP, by **MINH-VU HOANG**, purchased the property located at 4629 Governor Kent Court, Upper Marlboro, Maryland (“4629 Governor Kent Court”) for approximately \$72,000.

F2. On or about February 28, 2005, **MINH-VU HOANG** caused A.B. and J.L.R. to be substituted on foreclosure forms for Segal GP as the purchasers of 4629 Governor Kent Court.

F3. On or about March 1, 2005, Segal GP sold 4629 Governor Kent Court to A.B. and J.L.R., the substitute purchasers, for the sum of \$273,000, with the net profit on the sale of approximately \$183,929.24 distributed to Segal GP and **MINH-VU HOANG** and **THANH HOANG**.

G. Failure to File Income Tax Returns

G1. On or about April 16, 2001, **MINH-VU HOANG** and **THANH HOANG** failed to report their income and evaded income tax liability by failing to file with the IRS a Form 1040 for tax year 2000.

G2. On or about April 15, 2002, **MINH-VU HOANG** and **THANH HOANG** failed to report their income and evaded income tax liability by failing to file with the IRS a Form 1040 for tax year 2001.

G3. On or about April 15, 2003, **MINH-VU HOANG** and **THANH HOANG** failed to report their income and evaded income tax liability by failing to file with the IRS a Form 1040 for tax year 2002.

G4. On or about April 15, 2004, **MINH-VU HOANG** and **THANH HOANG** failed to report their income and evaded income tax liability by failing to file with the IRS a Form 1040 for tax year 2003.

G5. On or about April 15, 2005, **MINH-VU HOANG** and **THANH HOANG** failed to report their income and evaded income tax liability by failing to file with the IRS a Form 1040 for tax year 2004.

G6. On or about April 17, 2006, **MINH-VU HOANG** and **THANH HOANG** failed to report their income and evaded income tax liability by failing to file with the IRS a Form 1040 for tax year 2005.

18 U.S.C. § 371

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9 and 11 through 18 of Count One are incorporated here.
2. On or about April 16, 2001, in the District of Maryland and elsewhere, the

defendant,

MINH-VU HOANG,

a resident of Bethesda, Maryland, did willfully attempt to evade and defeat a substantial amount of her income tax due and owing to the United States for tax year 2000, by attempting to conceal her true income and substantial income tax liability to the United States by failing to file with the IRS on or before April 16, 2001, as required by law, Form 1040, U.S. Individual Income Tax Return, in her name for tax year 2000, to report her receipt of income and resulting in substantial income tax liability to the United States, and by engaging in certain acts of concealment as referenced in paragraphs 4 through 9 and 11 through 18 of Count One.

26 U.S.C. § 7201

18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9 and 11 through 18 of Count One are incorporated here.
2. On or about April 15, 2002, in the District of Maryland and elsewhere, the

defendants,

**MINH-VU HOANG and
THANH HOANG,**

residents of Bethesda, Maryland, did willfully attempt to evade and defeat a substantial amount of their income tax due and owing to the United States for tax year 2001, by attempting to conceal their true income and substantial income tax liability to the United States by failing to file with the IRS on or before April 15, 2002, as required by law, Form 1040, U.S. Individual Income Tax Return, in their names for tax year 2001, to report their receipt of income and resulting in substantial income tax liability to the United States, and by engaging in certain acts of concealment as referenced in paragraphs 4 through 9 and 11 through 18 of Count One.

26 U.S.C. § 7201
18 U.S.C. § 2

COUNT FOUR

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9 and 11 through 18 of Count One are incorporated here.
2. On or about April 15, 2003, in the District of Maryland and elsewhere, the

defendants,

**MINH-VU HOANG and
THANH HOANG,**

residents of Bethesda, Maryland, did willfully attempt to evade and defeat a substantial amount of their income tax due and owing to the United States for tax year 2002, by attempting to conceal their true income and substantial income tax liability to the United States by failing to file with the IRS on or before April 15, 2003, as required by law, Form 1040, U.S. Individual Income Tax Return, in their names for tax year 2002, to report their receipt of income and resulting in substantial income tax liability to the United States, and by engaging in certain acts of concealment as referenced in paragraphs 4 through 9 and 11 through 18 of Count One.

26 U.S.C. § 7201
18 U.S.C. § 2

COUNT FIVE

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9 and 11 through 18 of Count One are incorporated here.
2. On or about April 15, 2004, in the District of Maryland and elsewhere, the

defendants,

MINH-VU HOANG and THANH HOANG,

residents of Bethesda, Maryland, did willfully attempt to evade and defeat a substantial amount of their income tax due and owing to the United States for tax year 2003, by attempting to conceal their true income and substantial income tax liability to the United States by failing to file with the IRS on or before April 15, 2004, as required by law, Form 1040, U.S. Individual Income Tax Return, in their names for tax year 2003, to report their receipt of income and resulting in substantial income tax liability to the United States, and by engaging in certain acts of concealment as referenced in paragraphs 4 through 9 and 11 through 18 of Count One.

26 U.S.C. § 7201

18 U.S.C. § 2

COUNT SIX

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9 and 11 through 18 of Count One are incorporated here.
2. On or about April 15, 2005, in the District of Maryland and elsewhere, the

defendants,

**MINH-VU HOANG and
THANH HOANG,**

residents of Bethesda, Maryland, did willfully attempt to evade and defeat a substantial amount of their income tax due and owing to the United States for tax year 2004, by attempting to conceal their true income and substantial income tax liability to the United States by failing to file with the IRS on or before April 15, 2005, as required by law, Form 1040, U.S. Individual Income Tax Return, in their names for tax year 2004, to report their receipt of income and resulting in substantial income tax liability to the United States, and by engaging in certain acts of concealment as referenced in paragraphs 4 through 9 and 11 through 18 of Count One.

26 U.S.C. § 7201
18 U.S.C. § 2

COUNT SEVEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9 and 11 through 18 of Count One are incorporated here.
2. On or about April 17, 2006, in the District of Maryland and elsewhere, the

defendants,

**MINH-VU HOANG and
THANH HOANG,**

residents of Bethesda, Maryland, did willfully attempt to evade and defeat a substantial amount of their income tax due and owing to the United States for tax year 2005, by attempting to conceal their true income and substantial income tax liability to the United States by failing to file with the IRS on or before April 17, 2006, as required by law, Form 1040, U.S. Individual Income Tax Return, in their names for tax year 2005, to report their receipt of income and resulting in substantial income tax liability to the United States, and by engaging in certain acts of concealment as referenced in paragraphs 4 through 9 and 11 through 18 of Count One.

26 U.S.C. § 7201
18 U.S.C. § 2

COUNT EIGHT

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One are incorporated here.

A. The Bankruptcy Code

2. At all times relevant to this Second Superseding Indictment, bankruptcy filings made in the United States Bankruptcy Court were governed by Title 11 of the United States Code, commonly known as the Bankruptcy Code. The bankruptcy process is designed to achieve the orderly distribution of payments to creditors from available assets truthfully disclosed, and provide a “fresh start” to honest debtors in need of relief from insolvency by allowing them to discharge their debts.

3. In a proceeding under Chapter 11 of the Bankruptcy Code, in most cases the debtor initiates the bankruptcy process by filing a voluntary petition for bankruptcy with the Bankruptcy Court in order to be afforded the opportunity to propose a “Plan” for the repayment of his/her creditors over a period of time. The filing of the petition invokes an automatic stay of all debt collection activities by debtors. The assets and interests of the debtor are collectively referred to as an “estate,” which comes into existence automatically upon filing the petition. After filing the petition, the debtor files “schedules,” which are documents that require the debtor to identify, among other things, real and personal property, whether the property is secured or unsecured, and whether the debtor believes such property is exempt or nonexempt from creditors. Among the schedules a debtor is required to file are “Schedule A – Real Property” and “Schedule B – Personal Property.” Debtors also are required to report in a separate “Statement of Financial Affairs” interests in, and transfers of, property that occurred within two

years prior to the date of the filing of the bankruptcy petition. Debtors or their principals sign these schedules under penalty of perjury, and declare that they are true. A similar process exists for debtors under Chapter 7 of the Bankruptcy Code, although Chapter 7 contemplates a liquidation of all the debtor's non-exempt assets by a Bankruptcy Trustee appointed for that purpose ("the Appointed Bankruptcy Trustee"). In fact, proceedings under Chapter 11 are frequently converted to proceedings under Chapter 7 upon motion of the creditors, the Appointed Bankruptcy Trustee, the United States Trustee or *sua sponte* by the bankruptcy court. A debtor also may voluntarily convert a Chapter 11 case to a Chapter 7 proceeding.

B. The Defendants and the Bankruptcy Process

4. On or about May 10, 2005, **MINH-VU HOANG** filed for a voluntary petition under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Maryland. The case was docketed as *In re Minh-Vu Hoang*, Bankruptcy No. 05-21078-TJC. On or about May 27, 2005, **MINH-VU HOANG** filed several schedules and a Statement of Financial Affairs. When filing her schedules and Statement of Financial Affairs with the Bankruptcy Court, pursuant to her voluntary petition, **MINH-VU HOANG** declared under penalty of perjury that the information contained in her schedules and Statement of Financial Affairs was true and correct. On or about October 28, 2005, the Bankruptcy Court converted the Chapter 11 proceeding into a Chapter 7 liquidation.

5. On or about July 13, 2005, **THANH HOANG** filed for a voluntary petition under Chapter 11 of the Bankruptcy Code. The case was docketed as *In re Thanh Hoang*, Bankruptcy No. 05-25738-TJC. **THANH HOANG** did not file any additional schedules with his voluntary petition.

6. On or about July 21, 2005, **VAN THANH VU** filed for a voluntary petition under Chapter 11 of the Bankruptcy Code. The case was docketed as *In re Van T. Vu*, Bankruptcy No. 05-26521-TJC. On or about August 25, 2005, **VAN THANH VU** filed accompanying schedules and her Statement of Financial Affairs. When filing her schedules in Bankruptcy Court, pursuant to her voluntary petition, **VAN THANH VU** declared under penalty of perjury that the information contained in her schedules was true and correct.

7. At various times relevant to this Second Superseding Indictment, the United States Trustee acted in its statutory capacity pursuant to 28 U.S.C. § 586 to supervise the administration of the bankruptcy cases commenced by **MINH-VU HOANG, THANH HOANG** and **VAN THANH VU**. Attorney G.R. was designated as the Appointed Bankruptcy Trustee in the bankruptcy case commenced by **MINH-VU HOANG**.

The Conspiracy and Its Objects

8. Beginning in or about January 2004 and continuing through in or about October 2007, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG,
THANH HOANG,
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu, and
HAI DUC NGO,**

knowingly and willfully combined, conspired, confederated and agreed with each other and others known and unknown to the Grand Jury to commit an offense against the United States, to wit, to knowingly and fraudulently conceal from a custodian, trustee, marshal, and other officer of the court charged with the control and custody of property, and, in connection with a case under Title 11, from creditors and the United States Trustee, any property belonging to the estate

of the debtor, in violation of 18 U.S.C. § 152(1).

Manner and Means of the Conspiracy

The manner and means of committing the conspiracy included the following:

9. **MINH-VU HOANG, THANH HOANG, VAN THANH VU, HAI DUC NGO** and others known and unknown to the Grand Jury concealed **MINH-VU HOANG**'s receipt of substantial income and control of substantial assets from the Bankruptcy Court.

10. **THANH HOANG, VAN THANH VU** and **HAI DUC NGO** purchased and sold foreclosure properties using GPs, LPs and LLCs to conceal **MINH-VU HOANG**'s financial interest in those properties.

11. **MINH-VU HOANG** and **THANH HOANG** used third parties to create fictitious LLCs and LLC bank accounts, into which they deposited and caused to be deposited the proceeds of the sale of properties in which they had an interest, so as to conceal from the Bankruptcy Court their interest in the properties and the proceeds generated from the sales of such properties.

12. **MINH-VU HOANG** and **THANH HOANG** used the **HOANG** escrow account to conceal **MINH-VU HOANG**'s financial interest in those properties.

13. **MINH-VU HOANG** filed a bankruptcy petition, schedules and statement of financial affairs that concealed her and **THANH HOANG**'s joint financial interest and their interest in foreclosure properties omitting numerous foreclosure properties from their bankruptcy schedules.

Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendants **MINH-VU HOANG, THANH HOANG, VAN THANH VU** and **HAI DUC NGO** and coconspirators committed and caused to be committed at least one of the following acts, among others, in the District of Maryland and elsewhere:

A. Bankruptcy Schedules

A1. On or about May 27, 2005, **MINH-VU HOANG** filed Schedule A – Real Property in Bankruptcy Co. 05-21078-TJC and listed six properties, including 9101 Clewerwall Drive, Bethesda, Maryland, but failed to disclose her ownership interest in parcels of real property, including but not limited to:

- a. 9807 Moreland Street, Fort Washington, Maryland;
- b. 1836 Metzert Road #101, Adelphi, Maryland;
- c. 14007 Reverend Boucher Place, Upper Marlboro, Maryland;
- d. 6015 Wesson Drive, Suitland, Maryland; and
- e. 7333 Carved Stone, Columbia, Maryland.

A2. On or about May 27, 2005, **MINH-VU HOANG** filed Schedule B – Personal Property in Bankruptcy No. 05-21078-TJC and failed to disclose her ownership interest in general partnerships, limited partnerships and limited liability corporations, including but not limited to Segal GP, Pool GP, Pacific Rim GP, Cybele GP, Sibelius LLC, and MVHP LLC, and further failed to disclose her financial interest in the proceeds of the sale of certain properties, such as 8413 Potomac Avenue, College Park, Maryland, sold shortly before her bankruptcy. **MINH-VU HOANG** also was required to provide monthly reporting of her assets related to her

original Chapter 11 petition, before it was converted to Chapter 7 in October 2005. **MINH-VU HOANG** either failed to file such reports or filed reports that did not disclose her ownership interest in general partnerships, limited partnerships and limited liability corporations, or her financial interest in proceeds from the sales of properties sold at or around the time of the filing of the Schedule B.

A3. On or about May 27, 2005, **MINH-VU HOANG** filed Statement of Financial Affairs in Bankruptcy No. 05-21078-TJC in which she falsely reported income of \$96,000 for 2003 and \$96,000 for 2004, when she well knew that her taxable income those two years exceeded \$15 million.

A4. On or about August 25, 2005, **VAN THANH VU** filed in Bankruptcy No. 05-26521-TJC, among other things, a Statement of Financial Affairs and her Schedule B – Personal Property in which she failed to disclose her interest in Madison Plus LLC, and further failed to disclose her position as signatory on the Madison Plus LLC account, which she used to deposit and withdraw monies for the purchase and sale of foreclosure properties for the benefit of **MINH-VU HOANG**, after **MINH-VU HOANG** filed her bankruptcy petition.

A5. On or about September 13, 2006, **HAI DUC NGO** filed a false affidavit in Bankruptcy No. 05-26521-TJC in the name of **VAN THANH VU** claiming, among other things, that all the funds in the Madison Plus LLC account were his exclusive contributions and not the contributions of any other person (“the **HAI DUC NGO** affidavit”).

B. 8413 Potomac Avenue, College Park, Maryland

B1. On or about March 3, 2005, **MINH-VU HOANG** and **THANH HOANG** caused approximately \$264,465.85 to be withdrawn from the **HOANG** escrow account to purchase

8413 Potomac Avenue, College Park, Maryland (“8413 Potomac Avenue”) in the name of MU GP.

B2. On or about May 9, 2005, Mubilt GP sold 8413 Potomac Avenue for approximately \$365,951.99. **MINH-VU HOANG** and **VAN THANH VU** caused the proceeds of the sale to be disbursed between on or about May 9, 2005 and on or about May 18, 2005 in numerous checks and at least one wire transmission, including check no. 18976 in the amount of \$253,625.46, dated May 17, 2005, made payable to “**VAN THI VU**,” which **VAN THANH VU** failed to deposit until on or about July 6, 2005. **MINH-VU HOANG** failed to disclose her interest in such property or receipt of the proceeds from the sale of such property in her original Petition or accompanying Schedules.

B3. On or about July 6, 2005, **VAN THANH VU** converted check no. 18976 in the amount of \$253,625.46 into eight cashier’s checks of varying amounts. Six of those checks were SunTrust Official Check nos. 4958009144 in the amount of \$50,000; 4958009145 in the amount of \$50,000; 4958009146 in the amount of \$50,000; 4958009147 in the amount of \$25,000; 4958009148 in the amount of \$15,000; and, 4958009149 in the amount of \$15,000.

B4. On or about January 23, 2006, **VAN THANH VU** endorsed SunTrust Official Check no. 4958009144 in the amount of \$50,000 and deposited it into Chevy Chase bank account no. 3073269304 in the name of **HAI DUC NGO**.

B5. On or about January 23, 2006, **VAN THANH VU** endorsed SunTrust Official Check no. 4958009145 in the amount of \$50,000 and deposited it into Bank of America account no. 003928030612 in the name of **HAI DUC NGO** and N.V.N.

B6. On or about February 7, 2006, **VAN THANH VU** endorsed SunTrust Official Check no. 4958009147 in the amount of \$25,000 and deposited it into Bank of America account no. 003928030612 in the name of **HAI DUC NGO** and N.V.N.

B7. On or about February 8, 2006, **VAN THANH VU** endorsed SunTrust Official Check no. 4958009146 in the amount of \$50,000 and deposited it into Chevy Chase bank account no. 3073269304 in the name of **HAI DUC NGO**.

B8. On or about February 14, 2006, **VAN THANH VU** endorsed SunTrust Official Check no. 4958009148 in the amount of \$15,000 and deposited it into Chevy Chase bank account no. 3073269304 in the name of **HAI DUC NGO**.

B9. On or about February 24, 2006, **HAI DUC NGO** wrote check no. 1067 in the amount of \$70,000, made payable to BB&T Bank and drawn on Chevy Chase account no. 3073269304 in the name of **HAI DUC NGO** for the purpose of paying down a personal line of credit.

C. 9807 Moreland Street, Fort Washington, Maryland

C1. On or about May 10, 2005, **MINH-VU HOANG** and **THANH HOANG** caused approximately \$226,000 to be withdrawn from the **HOANG** escrow account to purchase the property located at 9807 Moreland Street, Fort Washington, Maryland (“9807 Moreland Street”) in the name of Cybele GP.

C2. On or about May 26, 2005, **MINH-VU HOANG** prepared a deed to transfer the property at 9807 Moreland Street to L.Q.S., which she backdated to April 26, 2005, a date prior to her bankruptcy petition.

C3. On or about July 6, 2005, **THANH HOANG** executed an Assignment of Funds for “Cybele G.P.,” resulting from the sale of 9807 Moreland Street on June 28, 2005, in which he requested the settlement processor to remit the “Cash to Seller” balance of \$294,814.98 to the Madison Plus LLC account.

C4. On or about July 11, 2005, **MINH-VU HOANG** obtained a state court order substituting purchaser L.Q.S. for Cybele GP for the sale of 9807 Moreland Street.

D. 1836 Metzerott Road #101, Adelphi, Maryland

D1. On or about March 3, 2005, **MINH-VU HOANG** and **THANH HOANG** caused approximately \$91,000 to be withdrawn from the **HOANG** escrow account to purchase 1836 Metzerott Road #101, Adelphi, Maryland (“1836 Metzerott Road #101”) in the name of Cybele GP.

D2. On or about June 28, 2005, Coconspirator A paid a deposit of \$15,000 on behalf of Arundel Garden GP towards the purchase for \$202,500 of property located at 723 Hammonds Lane, Brooklyn Park, Maryland (“723 Hammonds Lane”).

D3. On or about July 29, 2005, Cybele GP sold 1836 Metzerott Road #101 for approximately \$165,000. **MINH-VU HOANG** failed to disclose her interest in such property in her original Petition or accompanying Schedules. Bay GP used some of the proceeds from the sale of 1836 Metzerott Road #101 to purchase 1212 Chapelwood Lane, Capitol Heights, Maryland (“1212 Chapelwood Lane”) on or about August 5, 2005.

D4. Between on or about July 1, 2005 and on or about August 23, 2005, **HAI DUC NGO**, as partner of Arundel Garden GP, purchased 723 Hammonds Lane from the foreclosure Trustee. Among the checks used to purchase was check no. 1004, dated August 23, 2005, from

Magazine & Hilman, P.C., made payable to Bay GP at 9101 Clewerwall Drive, Bethesda, Maryland, in the amount of \$51,352.23 from an overpayment for the purchase of 1212 Chapelwood Drive. Settlement on 723 Hammonds Lane occurred on or about September 15, 2005.

D5. On or about August 25, 2005, **HAI DUC NGO** executed a purchase money deed of trust to Arundel Garden GP and Homestead Funding GP for 723 Hammonds Lane.

D6. On or about September 13, 2006, **HAI DUC NGO** filed a sworn Affidavit with the U.S. Bankruptcy Court in Greenbelt, Maryland, stating that he supplied the funds maintained in the Madison Plus LLC account and that he had instructed **VAN THANH VU** to make withdrawals from that account solely for his benefit.

D7. On or about December 7, 2005, **HAI DUC NGO** signed the Deed for 723 Hammonds Lane.

D8. On or about January 7, 2006, **MINH-VU HOANG** obtained federal tax identification no. 20-4059525 and formed Homestead Funding GP. The Partnership Agreement reflected that the Homestead Funding GP partners were **MINH-VU HOANG** and Conspirator A.

D9. On or about April 27, 2006, **MINH-VU HOANG** opened bank account no. 1401036501 in the name of Homestead Funding GP at Sandy Spring Bank, Olney, Maryland (“the Homestead Funding GP account”).

D10. On or about April 27, 2006, **HAI DUC NGO**, as seller of 723 Hammonds Lane, authorized the sales proceeds of \$204,575 from the sale of 723 Hammonds Lane, to be wired to the Homestead Funding GP account at Sandy Spring Bank.

D11. On or about May 1, 2006, Global Title, as settlement agent for the purchasers of 723 Hammonds Lane, paid \$61,354.06 to **HAI DUC NGO** and \$204,775.50 to Homestead Funding GP as the first mortgage lienholder, in order to pay off the purported first mortgage.

D12. On or about May 8, 2006, **MINH-VU HOANG** wrote check no. 0092 for \$200,000, drawn on the Homestead Funding GP account at Sandy Spring Bank, which she used to purchase Official Check no. 246240807 in the amount of \$200,000 and made payable to “Shapiro and Burson” for the purchase of 5501 Trent Street, Clinton, Maryland by MVHP LLC.

E. 14007 Reverend Boucher Place, Upper Marlboro, Maryland

E1. On or about January 7, 2005, **MINH-VU HOANG** and **THANH HOANG** caused approximately \$218,884.18 to be withdrawn from the **HOANG** escrow account to purchase the property located at 14007 Reverend Boucher Place, Upper Marlboro, Maryland (“14007 Reverend Boucher Place”) in the name of Phamin GP. On or about July 15, 2005, 14007 Reverend Boucher Place was sold for approximately \$290,000.

E2. On or about July 15, 2005, **THANH HOANG** executed an Assignment of Funds for “Phamin G.P.,” resulting from the sale of 14007 Reverend Boucher Place, in which he directed that the net proceeds from the sale be wired to the Madison Plus LLC account.

E3. On or about July 19, 2005, **THANH HOANG** caused a wire transfer of \$280,571.57 to be made into the Madison Plus LLC account from the proceeds of the sale of 14007 Reverend Boucher Place.

E4. On or about July 27, 2005, **VAN THANH VU** signed and endorsed check no. 81, made payable to cash in the amount of \$105,238.86, drawn on the Madison Plus LLC account,

and used it to purchase SunTrust Official Check no. 4834009911, made payable to trustee “Samuel I. White, P.C. File No. 0855-05” for the purchase of 6611 Jupiter Hills Circle #21-I, Alexandria, Virginia.

F. 6015 Wesson Drive, Suitland, Maryland

F1. On or about February 18, 2004, **MINH-VU HOANG** and **THANH HOANG** caused approximately \$152,700.00 to be withdrawn from the **HOANG** escrow account to purchase the property located at 6015 Wesson Drive, Suitland, Maryland (“6015 Wesson Drive”) in the name of MU GP. On or about May 31, 2005, 6015 Wesson Drive was sold for approximately \$290,000.

F2. On or about May 31, 2005, **MINH-VU HOANG** and **VAN THANH VU** signed the Form HUD-1 for the sale of 6015 Wesson Drive.

F3. On or about July 5, 2005, **VAN THANH VU** endorsed check no. 12780, made payable to “Van T. Vu, partner MU GENERAL PARTNERSHIP,” drawn on the account of “Settlement Escrow & Abstract Solutions, Inc.” at Mercantile Potomac Bank in the amount of \$253,427.32, which was deposited into the Madison Plus LLC account.

F4. On or about June 2, 2005, check no. 12791, **MINH-VU HOANG** and **VAN THANH VU** caused “Settlement Escrow & Abstract Solutions, Inc.” to issue to “MINH-VU HOANG, partner MU GENERAL PARTNERSHIP” in the amount of \$28,158.59.

F5. On or about July 27, 2005, **VAN THANH VU** signed and endorsed an unnumbered check, made payable to cash in the amount of \$452,298.33, drawn on the Madison Plus LLC account, and used it to purchase SunTrust Official Check no. 4834009910, made payable to trustee “Samuel I. White, P.C. File No. 1152-05” for the purchase of 5512 Cherokee

Avenue, Alexandria, Virginia.

F6. On or about September 22, 2005, **MINH-VU HOANG** endorsed check no. 12791 in the amount of \$28,158.59 to P.Z.

G. 7333 Carved Stone, Columbia, Maryland

G1. On or about November 16, 2004, **MINH-VU HOANG** and **THANH HOANG** caused approximately \$209,000.00 to be withdrawn from the **HOANG** escrow account to purchase the property located at 7333 Carved Stone, Columbia, Maryland (“7333 Carved Stone”) in the name of Cybele GP. On or about July 11, 2005, 7333 Carved Stone was sold for approximately \$285,000.

G2. On or about August 11, 2005, **VAN THANH VU** deposited into the Madison Plus LLC account check no. 30296, drawn on the account of “Central Processing Center LLC” at Access National Bank in the amount of \$272,359.05, representing the net proceeds from the sale of 7333 Carved Stone.

H. The Madison Plus LLC Account

H1. On or about July 18, 2005, **VAN THANH VU** withdrew \$188,888 from the Madison Plus LLC account, and purchased two SunTrust Official Checks, nos.4834009869 and 4834009870, in the amounts of \$175,000 and \$13,888, respectively, both payable to M.N. On or about the same date, **MINH-VU HOANG** gave those checks to M.N. in exchange for jewelry.

18 U.S.C. § 371

COUNT NINE

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One, paragraphs 2 through 7 and 9 through 13 of Count Eight, and Overt Acts A1 through H1 of Count Eight are incorporated here.
2. Between on or about May 10, 2005 and on or about the date of this Indictment, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG,
THANH HOANG,
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu, and
HAI DUC NGO,**

did knowingly and fraudulently conceal from a custodian, trustee, marshal, and other officer of the court charged with the control and custody of property, and, in connection with a case under Title 11, from creditors and the United States Trustee, property belonging to the estate of the debtor **MINH-VU HOANG**, including:

a.. her ownership interests in parcels of real property, including but not limited to:

1. 9807 Moreland Street, Fort Washington, Maryland;
2. 14007 Reverend Boucher Place, Upper Marlboro, Maryland;
3. 1836 Metzert Road #101, Adelphi, Maryland;
4. 6015 Wesson Drive, Suitland, Maryland; and
5. 7333 Carved Stone, Columbia, Maryland; and

b. her ownership interest in general partnerships and limited liability corporations and limited partnerships, including but not limited to, Segal GP, Pool GP, Pacific Rim GP, Cybele GP, Sibelius LLC and MVHP LLC.

18 U.S.C. § 152(1)

18 U.S.C. § 2

COUNT TEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.

2. On or about May 27, 2005, in the District of Maryland, the defendant,

MINH-VU HOANG,

knowingly and fraudulently made material false declarations under penalty of perjury as permitted under section 1746 of title 28, in and in relation to a case under title 11, in that defendant caused to be submitted to the Bankruptcy Court:

a. Schedule A – Real Property, in which she listed six properties, including 9101 Clewerwall Drive, Bethesda, Maryland, but failed to disclose her ownership interest in parcels of real property, including but not limited to:

1. 9807 Moreland Street, Fort Washington, Maryland;
2. 1836 Metzert Road #101, Adelphi, Maryland;
3. 14007 Reverend Boucher Place, Upper Marlboro, Maryland;
4. 6015 Wesson Drive, Suitland, Maryland; and
5. 7333 Carved Stone, Columbia, Maryland.

b. Schedule B – Personal Property, in which she failed to disclose her ownership interest in general partnerships, limited partnerships and limited liability corporations, including but not limited to Segal GP, Pool GP, Pacific Rim GP, Cybele GP, Sibelius LLC, MVHP LLC, and her interest in proceeds of properties sold, including 8413 Potomac Avenue, College Park, Maryland; and,

c. Statement of Financial Affairs, in which she failed to disclose her ownership interest in general partnerships, limited partnerships and limited liability corporations, including but not limited to Segal GP, Pool GP, Pacific Rim GP, Cybele GP, Sibelius LLC and MVHP LLC, and real property owned by these entities.

18 U.S.C. § 152(3)

18 U.S.C. § 2

COUNT ELEVEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.

2. On or about July 21, 2005, in the District of Maryland, the defendant,

**VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu,**

knowingly and fraudulently made material false declarations under penalty of perjury as permitted under section 1746 of title 28, in and in relation to a case under title 11, in that defendant caused to be submitted to the Bankruptcy Court a Schedule B (Personal Property) and a Statement of Financial Affairs in which she failed to disclose

a. her interest in Madison Plus LLC; and

b. her position as signatory on the Madison Plus LLC account, which she used to deposit and withdraw monies for the purchase and sale of foreclosure properties for the benefit of **MINH-VU HOANG** after **MINH-VU HOANG** filed her bankruptcy petition.

18 U.S.C. § 152(3)

18 U.S.C. § 2

COUNT TWELVE

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.

2. On or about September 13, 2006, in the District of Maryland, the defendant,

HAI DUC NGO,

knowingly and fraudulently made a material false oath and account in and in relation to a case under title 11, to wit, filing a sworn Affidavit with the U.S. Bankruptcy Court in Greenbelt, Maryland stating that he had contributed the proceeds that were deposited into the Madison Plus LLC account and that he had instructed **VAN THANH VU** to make withdrawals from that account solely for his benefit, when in truth and in fact, as he well knew, the funds deposited to the Madison Plus LLC account were not his and were for the benefit of others, including **MINH-VU HOANG.**

18 U.S.C. § 152(2)

18 U.S.C. § 2

COUNT THIRTEEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about July 6, 2005, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG,
THANH HOANG,
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu, and
HAI DUC NGO,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that defendants caused the execution of an Assignment of Funds for “Cybele G.P.,” resulting from the sale of the property located at 9807 Moreland Street, Ft. Washington, Maryland on June 28, 2005, and in which **THANH HOANG** requested the settlement processor to remit the “Cash to Seller” balance of \$294,814.98 to the Madison Plus LLC account.

18 U.S.C. § 1957(a)
18 U.S.C. § 2

COUNT FOURTEEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about July 18, 2005, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG,
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu, and
HAI DUC NGO,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that **MINH-VU HOANG, VAN THANH VU** and **HAI DUC NGO** caused to be withdrawn and transferred \$175,000, more or less, from the Madison Plus LLC account to M.N.

18 U.S.C. § 1957(a)
18 U.S.C. § 2

COUNT FIFTEEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about July 18, 2005, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG,
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu, and
HAI DUC NGO,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that **MINH-VU HOANG, VAN THANH VU** and **HAI DUC NGO** caused to be withdrawn and transferred \$13,888, more or less, from the Madison Plus LLC account to M.N.

18 U.S.C. § 1957(a)

18 U.S.C. § 2

COUNT SIXTEEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about July 27, 2005, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG, and
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that **MINH VU-HOANG** and **VAN THANH VU** caused an unnumbered check, dated July 27, 2005, made payable to cash in the amount of \$452,298.32, to be withdrawn from the Madison Plus LLC account, which was then used to purchase SunTrust Official Check no. 4834009910, dated July 27, 2005, made payable to “Samuel I. White, P.C. File No. 1152-05” for the purchase of property located at 5112 Cherokee Avenue, Alexandria, Virginia.

18 U.S.C. § 1957(a)
18 U.S.C. § 2

COUNT SEVENTEEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about February 8, 2006, in the District of Maryland and elsewhere, the defendants,

**HAI DUC NGO, and
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that **HAI DUC NGO** caused to be deposited in Chevy Chase account no. 3073269304 SunTrust Official Check no. 4958009146 in the amount of \$50,000, more or less, provided to him by **VAN THANH VU** as proceeds from the sale of 8413 Potomac Avenue, College Park, Maryland.

18 U.S.C. § 1957(a)

18 U.S.C. § 2

COUNT EIGHTEEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about February 24, 2006, in the District of Maryland and elsewhere, the defendants,

**HAI DUC NGO, and
VAN THANH VU,
a/k/a Van Thi Vu,
a/k/a Van T Vu,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that **VAN THANH VU** provided SunTrust Official Check nos. 4958009144 in the amount of \$50,000, 4958009146 in the amount of \$50,000, and, 4958009148 in the amount of \$15,000, as proceeds from the sale of 8413 Potomac Avenue, College Park, Maryland, to **HAI DUC NGO**, who wrote check no. 1067, drawn on Chevy Chase account no. 3073269304 and made payable to BB&T Bank in the amount of \$70,000.

18 U.S.C. § 1957(a)
18 U.S.C. § 2

COUNT NINETEEN

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about May 8, 2006, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG, and
THANH HOANG,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that **MINH VU-HOANG** wrote check no.0092 for \$200,000, drawn on the Homestead Funding GP account at Sandy Spring Bank, which she used to purchase Official Check no. 246240807 in the amount of \$200,000 and made payable to “Shappiro and Burson” for the purchase of 5501 Trent Street, Clinton, Maryland in the name of MVHP LLC.

18 U.S.C. § 1957(a)
18 U.S.C. § 2

COUNT TWENTY

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 4 through 9 of Count One and paragraphs 2 through 7 and 9 through 13 of Count Eight are incorporated here.
2. On or about October 4, 2006, in the District of Maryland and elsewhere, the defendants,

**MINH-VU HOANG, and
THANH HOANG,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, concealment of property in a bankruptcy proceeding, in violation of 18 U.S.C. § 152(1), and conspiracy to commit such offense, in violation of 18 U.S.C. § 371 – in that **MINH-VU HOANG** and **THANH HOANG** caused to be withdrawn from Bank of America account no. 004468917498 in the name of Noda LLC the amount of \$21,596.84 for payments on American Express account no. ending in 62002 in the name of **THANH HOANG** and American Express account no. ending in 62028 in the name of **MINH-VU HOANG**.

18 U.S.C. § 1957(a)
18 U.S.C. § 2

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson

Date: May 28, 2008