



COUNT 1

(Conspiracy to Transport and Harbor Aliens)

The Grand Jury charges:

1. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, aka TOM NGUYEN, AN QUOC NGUYEN, aka ANDREW NGUYEN, HON VUONG, aka HON YOUNG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, aka ALEX ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, aka TERRY NGUYEN, HV CONNECT INC., aka HV CONNECT INC. OF OHIO, aka HV CONNECT INC. OF OHIO #1, aka HV CONNECT USA, aka HV CONNECT STAFFING LTD., aka HV CONNECTION OF OHIO, aka TNTUSVN TRADING CO., and TN JOB SERVICE, INC., along with other persons whose identities are known and unknown to the Grand Jury, did knowingly and willfully conspire together and with each other to commit offenses against the United States, hereafter described, that is:

(a) knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, to transport and move, and attempt to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii); and

(b) knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, to conceal, harbor, and shield from detection, and attempt to conceal, harbor, and shield from detection, such alien in any place, including a building and any means of transportation, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

OBJECTS OF THE CONSPIRACY

2. The objects of the conspiracy were to:

(a) hire and employ aliens who were present in the United States in violation of law;

(b) hire and employ aliens who, though legally present, had no authorization to work in the United States;

(c) transport and arrange for the transportation of said aliens;

(d) house and arrange for the housing of said aliens;

(e) assist said aliens in procuring false and fraudulent documents to create the appearance that said aliens were lawfully in the United States and had authorization to work in the United States; and

(f) to make money through the employment of said aliens.

MANNER AND MEANS

3. Defendants and their co-conspirators employed the following manner and means to attain the objective of the conspiracy:

(a) Defendants HON VUONG, TRUNG Q. NGUYEN, AN QUOC NGUYEN, and MSHENGA ABDY NASSEB, operated HV CONNECT INC., aka HV CONNECT INC. OF OHIO, aka HV CONNECT INC. OF OHIO #1, aka HV CONNECT USA, aka HV CONNECT STAFFING LTD., aka HV CONNECTION OF OHIO, aka TNTUSVN TRADING CO. (hereafter "HV CONNECT INC."), a temporary employment agency in Philadelphia, Pennsylvania, and Canton, Ohio;

(b) Defendants TRUNG Q. NGUYEN, AN QUOC NGUYEN, TAI VAN NGUYEN, and MSHENGA ABDY NASSEB operated TN JOB SERVICE, INC., a temporary employment agency in Philadelphia, Pennsylvania; Pennsauken, New Jersey; Canton, Ohio; and New Philadelphia, Ohio;

(c) Defendant ASHRAF M. ABDELWAHED operated the Alexandria Employment Agency, a temporary employment agency in New York, New York. ASHRAF M. ABDELWAHED and Alexandria Employment Agency recruited aliens and assigned them to work for HV CONNECT INC., in Ohio. ASHRAF M. ABDELWAHED and Alexandria Employment Agency assisted the aliens in finding transportation from New York to the Northern District of Ohio and instructed the aliens to contact TRUNG Q. NGUYEN and HV CONNECT INC. when they arrived in Ohio;

(d) Defendants and conspirators employed MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, and ABDULRAHMAN A. MTUMWA to work in a supervisory capacity over aliens employed in the Northern District of Ohio by HV CONNECT INC. and TN JOB SERVICE, INC.;

(e) Defendants and conspirators contracted and agreed with various client company businesses in the Northern District of

Ohio to supply the client companies with temporary workers. Defendants and conspirators falsely represented to the client companies that all HV CONNECT INC. and TN JOB SERVICE, INC., employees had valid and proper authorization to work in the United States, that HV CONNECT INC. and TN JOB SERVICE, INC., would collect and pay payroll taxes for all of the alien employees, and that HV CONNECT INC. and TN JOB SERVICE, INC., would collect and pay Ohio Bureau of Workers Compensation premiums for all of the alien employees;

(f) Defendants TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, HV CONNECT INC., and TN JOB SERVICE, INC., employed aliens to work for client companies in the Northern District of Ohio. Most of these aliens were in the United States without authorization, and most of these aliens had no authorization to work in the United States;

(g) Defendants TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, HV CONNECT INC., and TN JOB SERVICE, INC., provided housing for the alien employees in various rental locations in the Northern District of Ohio;

(h) Defendants TRUNG Q. NGUYEN, AN QUOC NGUYEN, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., transported and arranged for transportation for the alien employees from rental housing to client company job sites in the Northern District of

Ohio;

(i) Defendants and conspirators failed to obtain proper work authorization for the alien employees;

(j) Defendants and conspirators failed to properly complete and maintain Immigration and Naturalization Service Forms I-9 (hereafter "Forms I-9"), which are required by law to be completed for each employee to verify identity and employment eligibility, for each alien employee working for HV CONNECT INC. and TN JOB SERVICE, INC., in the Northern District of Ohio.

(k) Defendants and conspirators assisted alien employees in obtaining false and fraudulent documents, including purported Social Security account cards, purported drivers licenses, purported identification cards, and purported Alien Registration Cards (hereafter "green cards") to create the false appearance that the alien employees were permitted to work in the United States;

(l) Defendants and conspirators maintained a computer internet website that falsely and fraudulently represented that all alien employees had proper documentation, and that work authorization would be obtained and provided;

(m) Defendants and conspirators received payments by wire transfers and by checks deposited to business bank accounts of HV CONNECT INC., from which TRUNG Q. NGUYEN, AN QUOC NGUYEN, TAI VAN NGUYEN, MSHENGA A. NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, and other conspirators and employees then obtained cash in order to pay alien HV CONNECT INC. employees.

(n) After relocating from Ohio, TRUNG Q. NGUYEN instructed client companies in the Northern District of Ohio to mail payments in the forms of checks payable to HV CONNECT INC. and later TN JOB SERVICE, INC., at P.O. Box 3878, Philadelphia, Pennsylvania. Rather than deposit these checks into a business bank account, TRUNG Q. NGUYEN, TAI VAN NGUYEN, and other persons whose identities are unknown to the Grand Jury, then cashed these checks through check-cashing businesses in eastern Pennsylvania and New Jersey;

(o) Defendants and conspirators did not collect or pay over federal employment taxes, including Social Security taxes and Medicare premiums, on behalf of alien employees of HV CONNECT INC. and TN JOB SERVICE, INC.;

(p) Defendants and conspirators did not collect nor pay over to the Ohio Bureau of Workers Compensation premiums on behalf of alien employees of HV CONNECT INC. and TN JOB SERVICE, INC.;

(q) Defendants and conspirators paid alien employees in cash from the proceeds of payments received from client companies in the Northern District of Ohio;

(r) In response to inquiries from client companies for proper work authorization, defendants and conspirators failed to provide valid Forms I-9 for alien employees. Defendants and conspirators provided some Forms I-9 that had been issued by other purported employers;

(s) Defendants and conspirators used the United States mails and directed client companies to use the United States mails in

order to carry out the alien employment scheme in the Northern District of Ohio;

(t) Defendants and conspirators used and directed others to use wire communications in interstate commerce, including interstate telefax transmissions, a computer internet website, and interstate and international wire transfers of money in furtherance of the alien employment scheme in the Northern District of Ohio; and

(u) Defendants and conspirators used the proceeds obtained from client companies to promote the business of the alien employment scheme in the Northern District of Ohio, in particular by using the proceeds to pay for rental housing and transportation for the alien employees.

OVERT ACTS

4. In furtherance of the conspiracy and to effect its object, defendants and their co-conspirators committed the following overt acts:

(a) On or about January 27, 2000, TRUNG Q. NGUYEN and HON VUONG applied to the Ohio Bureau of Workers Compensation for a policy in the name of HV CONNECT INC., 4904 South Boulevard N.W., Apt. 19, Canton, Ohio. The Ohio Bureau of Workers Compensation policy for HV CONNECT INC. remained in effect until on or about March 1, 2002.

(b) On or about February 3, 2000, TRUNG Q. NGUYEN applied with the Ohio Secretary of State for a foreign corporation license for HV CONNECT INC., 415 South 49th Street, Philadelphia,

Pennsylvania.

(c) On or about February 14, 2000, TRUNG Q. NGUYEN and HON VUONG entered into a contract authorizing TRUNG Q. NGUYEN to operate HV CONNECT INC. in Ohio for two years.

(d) On or about March 4, 2000, TRUNG Q. NGUYEN and HON VUONG sent a telefax to Case Foods, Inc., Winesburg, Ohio, including copies of the Pennsylvania drivers licenses of TRUNG Q. NGUYEN and HON VUONG.

(e) On or about June 14, 2000, TRUNG Q. NGUYEN filed a request with the Immigration and Naturalization Service to extend the visa of Yunus F., an employee of HV CONNECT, INC.

(f) On or about the following dates, TRUNG Q. NGUYEN filed a fraudulent payroll report with the Ohio Bureau of Workers Compensation, falsely representing that HV CONNECT INC. had five employees, that all of the employees were engaged exclusively in sales, and that HV CONNECT INC. had approximately \$25,000 in total sales business during the following time periods:

<u>Overt Act</u>	<u>Date Report Filed</u>	<u>Time Period Covered by Report</u>
(f)(1)	7/31/2000	January 2000 through July 2000
(f)(2)	2/27/2001	August 2000 through February 2001
(f)(3)	9/11/2001	February 2001 through August 2001

(g) Between on or about the following dates, the following defendants presented for payment checks, drawn on the bank accounts of HV CONNECT INC. and frequently in amounts greater

than \$10,000, and obtained cash with which to pay alien laborers on behalf of HV CONNECT INC.:

<u>Overt Act</u>	<u>Dates</u>	<u>Defendant</u>
(g)(1)	3/9/2000- 3/6/2002	TRUNG Q. NGUYEN
(g)(2)	8/14/2000- 12/13/2001	MSHENGAS NASSEB
(g)(3)	9/18/2000- 12/10/2001	RIDHA BOUGHALMI
(g)(4)	7/12/2001- 8/15/2002	ABDULRAHMAN MTUMWA
(g)(5)	6/21/2001- 10/12/2001	AN QUOC NGUYEN
(g)(6)	2/1/2002- 5/7/2002	TAI VAN NGUYEN

(h) On or about the following dates, TRUNG Q. NGUYEN and HV CONNECT INC. wrote checks in the following approximate amounts, payable to the Alexandria Employment Agency as follows:

<u>Overt Act</u>	<u>Date</u>	<u>Account No.</u>	<u>Check No.</u>	<u>Amount</u>	<u>Notes</u>
(h)(1)	8/11/2000	XXXXXX6959	1176	\$1,850	
(h)(2)	8/18/2000	XXXXXX6959	1190	\$500	
(h)(3)	8/26/2000	XXXXXX6959	1200	\$50	
(h)(4)	9/2/2000	XXXXXX6959	1203	\$100	
(h)(5)	10/22/2000	XXXXXX6959	1241	\$50	Driver License
(h)(6)	11/4/2000	XXXXXX7064	1003	\$260	5 licenses and Express Mail
(h)(7)	11/14/2000	XXXXXX7064	1011	\$60	4 drivers licenses
(h)(8)	1/31/2001	XXXXXX7064	1072	\$60	International Drivers License
(h)(9)	4/10/2001	XXXXXX7064	1177	\$60	

<u>Overt Act</u>	<u>Date</u>	<u>Account No.</u>	<u>Check No.</u>	<u>Amount</u>	<u>Notes</u>
(h)(10)	9/11/2001	XXXXXX7652	1005	\$65	Service fee

(i) On or about November 4, 2000, TRUNG Q. NGUYEN, AN QUOC NGUYEN, and HV CONNECT INC. sent a telefax from the Eastern District of Pennsylvania to Case Foods, Inc., in Winesburg, Ohio, including a purported Resident Alien Card ("green card"), a purported Social Security card, and a purported I-9 Form for an HV CONNECT INC. employee. TRUNG Q. NGUYEN, AN QUOC NGUYEN, and HV CONNECT INC. falsely represented that the Resident Alien Card and Social Security Account Number and were valid and accurate when in fact the Resident Alien Card and Social Security Account Number were false. The I-9 Form had not been completed by HV CONNECT INC. The I-9 Form purported to have been completed by Job Assistant of Pennsylvania.

(j) Between on or about May 1, 2001, and on or about November 23, 2001, TRUNG Q. NGUYEN, AN QUOC NGUYEN, and HV CONNECT INC., convinced the owner of Custom Design Technologies in Canton, Ohio, to allow some of Custom Design Technologies' employees to become employees of HV CONNECT INC. During this period of time, Custom Design Technologies paid HV CONNECT INC. In turn, TRUNG Q. NGUYEN, AN QUOC NGUYEN, and HV CONNECT INC., paid certain employees of Custom Design Technologies, but failed to pay over Social Security or Ohio Bureau of Workers Compensation premiums on behalf of those employees.

(k) On or about July 26, 2001, AN QUOC NGUYEN and HV CONNECT INC. mailed a letter by priority mail to Owner's Management

Company in Bedford Heights, Ohio, regarding the lease at 25400 Rockside Road, Apartment 615A.

(l) On or about September 14, 2001, TRUNG Q. NGUYEN and MSHENGA A. NASSEB established a business partnership in the name HV CONNECT STAFFING LTD., 231 2nd Street N.E., New Philadelphia, Ohio and recorded the business entity with the Ohio Secretary of State.

(m) On or about September 27, 2001, HV CONNECT INC. had at least seventeen illegal aliens assigned to work at Case Foods, Inc., Winesburg, Ohio.

(n) On or about October 7, 2001, at the Maple Heights Detention Facility in Maple Heights, Ohio, RIDHA A. BOUGHALMI visited an alien employee of HV CONNECT INC. who had been arrested on immigration violations.

(o) On or about October 18, 2001, AN QUOC NGUYEN sent a telefax to the Biery Cheese Company in Louisville, Ohio, including Forms I-9 for fifteen HV CONNECT INC. employees to begin work on October 22, 2001. None of the Forms I-9 had been completed by HV CONNECT INC. The Forms I-9 purported to have been completed by Pacific Job of Norristown, Pennsylvania.

(p) On or about October 31, 2001, TRUNG Q. NGUYEN verified the employment of Omar S. Alli with HV CONNECT INC. for the purposes of Omar S. Alli obtaining a "green card" from the Immigration and Naturalization Service.

(q) Between on or about November 4, 2001 and on or about November 6, 2001, TRUNG Q. NGUYEN converted approximately

\$28,096.62 in checks from client companies made payable to HV CONNECT INC. by presenting them to Samuel and Betya Girlya, proprietors of Sybig Construction and Sambe Construction companies in Cherry Hill, New Jersey, as partial down payment for a personal residence at 9 Ruth Court, Absecon, New Jersey, which checks were then deposited into Betya Girlya's personal account at Sun National Bank as follows:

<u>Maker</u>	<u>Check No.</u>	<u>Payee</u>	<u>Amount</u>	<u>Endorsement</u>
Cooper Farms-Processing	107141	HV CONNECT INC. OF OHIO 1	\$12,656.52	TRUNG Q. NGUYEN
Hertzfeld Poultry Farms	21503	HV CONNECT USA	\$9,235.21	TRUNG Q. NGUYEN
Waste Parchment	2557	HV CONNECT INC.	\$6,195.89	TRUNG Q. NGUYEN

(r) On or about November 14, 2001, TRUNG Q. NGUYEN converted a check made by Amish Door Inc., Wilmot, Ohio, payable to HV CONNECT USA in the approximate amount of \$2,602.28 directly into First Union Visa credit card account number XXXXXXXXXXXXX0922, in the name of TRUNG Q. NGUYEN, P.O. Box 80487, Canton, Ohio.

(s) On or about November 26, 2001, TRUNG Q. NGUYEN applied to the Ohio Bureau of Workers Compensation for a policy in the name of HV CONNECT STAFFING LTD., 231 2nd Street N.E., New Philadelphia, Ohio. The Ohio Bureau of Workers Compensation policy for HV CONNECT STAFFING LTD. remained in effect until on or about March 1, 2002.

(t) Between on or about November 26, 2001, and on or about March 1, 2002, TRUNG Q. NGUYEN failed to file payroll reports on behalf of HV CONNECT STAFFING LTD. with the Ohio Bureau of

Workers Compensation.

(u) On or about December 5, 2001, TAI VAN NGUYEN applied to the Ohio Bureau of Workers Compensation for a policy in the name of TN JOB SERVICE, INC., 5043 Westfield Avenue, Apt. B, Pennsauken, New Jersey. The Ohio Bureau of Workers Compensation policy for TN JOB SERVICE, INC., remained in effect until on or about August 31, 2002.

(v) Between on or about December 5, 2001, and on or about August 31, 2002, TAI VAN NGUYEN failed to file payroll reports on behalf of TN JOB SERVICE, INC., with the Ohio Bureau of Workers Compensation.

(w) Between on or about December 18, 2001, and February 6, 2002, TRUNG Q. NGUYEN, AN QUOC NGUYEN, and HV CONNECT INC. notified client companies in the Northern District of Ohio to forward payments to HV CONNECT INC. at P.O. Box 3878, Philadelphia, Pennsylvania.

(x) Between on or about January 23, 2002, and on or about March 12, 2002, HV CONNECT INC. instructed client companies to remit payment by check payable to TN JOB SERVICE, INC., P.O. Box 3878, Philadelphia, Pennsylvania.

(y) On or about July 10, 2002, in response to a request from Cooper Farms-Processing in St. Henry, Ohio, for TN JOB SERVICE, INC., to produce valid Forms I-9, TAI VAN NGUYEN, AN QUOC NGUYEN, and TN JOB SERVICE, INC., provided approximately fifteen purported Forms I-9 to Cooper Farms-Processing. None of the Forms I-9 had been completed by TN JOB SERVICE, INC. The Forms

I-9 were incomplete and purported to have been prepared by Pacific Job of New York, New York.

(z) On or about August 14, 2002, TRUNG Q. NGUYEN, TAI VAN NGUYEN, AN QUOC NGUYEN, and TN JOB SERVICE, INC., sent a telefax to Cooper Farms-Processing, St. Henry, Ohio, including copies of seven false and fraudulent Social Security cards for TN JOB SERVICE, INC., employees, falsely purporting that the cards were valid.

(aa) On or about October 2, 2002, AN QUOC NGUYEN and MSHENGA A. NASSEB, on behalf of TRUNG Q. NGUYEN and TN JOB SERVICE, INC., met with a representative of Cooper Farms-Processing to discuss the false and fraudulent documentation TN JOB SERVICE, INC., had submitted to Cooper Farms-Processing.

(bb) On or about October 3, 2002, TAI VAN NGUYEN, AN QUOC NGUYEN, and TN JOB SERVICE, INC., provided approximately eight illegal alien workers to L&W Egg Products Inc. in Millersburg, Ohio.

(cc) Between on or about the following dates, the following defendants supplied alien laborers to the following client companies in the Northern District of Ohio:

<u>Overt Act</u>	<u>Dates</u>	<u>Defendants</u>	<u>Client Company</u>
(cc)(1)	2/14/2000- 11/29/2001	TRUNG Q. NGUYEN HON VUONG AN QUOC NGUYEN MSHENGA A. NASSEB RIDHA BOUGHALMI HV CONNECT INC.	Case Foods Inc. Winesburg OH

<u>Overt Act</u>	<u>Dates</u>	<u>Defendants</u>	<u>Client Company</u>
(cc)(2)	4/1/2000- 12/4/2001	TRUNG Q. NGUYEN HON VUONG AN QUOC NGUYEN HV CONNECT INC.	Custom Design Technologies/Nexxstep Canton OH
(cc)(3)	8/17/2000- 6/18/2001	TRUNG Q. NGUYEN AN QUOC NGUYEN HV CONNECT INC.	Renewable Energy Products Inc. Canton OH
(cc)(4)	11/3/2000- 12/12/2000	TRUNG Q. NGUYEN HV CONNECT INC.	Gerber's Poultry Inc. Kidron OH
(cc)(5)	12/1/2000- 8/30/2001	TRUNG Q. NGUYEN AN QUOC NGUYEN HV CONNECT INC.	International Packaging Specialties Millersburg OH
(cc)(6)	12/13/2000- 1/25/2002	TRUNG Q. NGUYEN MSHENG A. NASSEB HV CONNECT INC.	Waste Parchment Inc. Millersburg OH
(cc)(7)	1/4/2001- 10/26/2001	TRUNG Q. NGUYEN AN QUOC NGUYEN MSHENG A. NASSEB HV CONNECT INC.	Cicchini/Avanti Corp. Canton OH
(cc)(8)	1/8/2001- 6/30/2001	TRUNG Q. NGUYEN HV CONNECT INC.	Baglieri Enterprises Hudson OH
(cc)(9)	2/19/2001- 10/12/2002	TRUNG Q. NGUYEN MSHENG A. NASSEB HV CONNECT INC. TAI VAN NGUYEN TN JOB SERVICE	Hertzfeld Poultry Farms Inc. Waterville OH
(cc)(10)	3/3/2001- 6/1/2001	TRUNG Q. NGUYEN AN QUOC NGUYEN HV CONNECT INC.	Anderson-Dubose Solon OH
(cc)(11)	3/13/2001- 10/18/2002	TRUNG Q. NGUYEN AN QUOC NGUYEN HV CONNECT INC. TAI VAN NGUYEN TN JOB SERVICE	Cooper Farms- Processing St. Henry OH
(cc)(12)	4/2/2001- 10/15/2001	TRUNG Q. NGUYEN AN QUOC NGUYEN HV CONNECT INC.	Amish Door Inc. Wilmot OH

<u>Overt Act</u>	<u>Dates</u>	<u>Defendants</u>	<u>Client Company</u>
(cc)(13)	4/20/2001- 10/3/2002	TRUNG Q. NGUYEN AN QUOC NGUYEN HV CONNECT INC. TAI VAN NGUYEN TN JOB SERVICE	L&W Egg Products Inc. Millersburg OH
(cc)(14)	6/5/2001- 10/5/2002	TRUNG Q. NGUYEN AN QUOC NGUYEN MSHENG A. NASSEB HV CONNECT INC. TAI VAN NGUYEN TN JOB SERVICE	Cooper Farms- Hatchery Oakwood OH
(cc)(15)	7/9/2001- 10/8/2002	AN QUOC NGUYEN TRUNG Q. NGUYEN MSHENG A. NASSEB HV CONNECT INC. TAI VAN NGUYEN TN JOB SERVICE	Biery Cheese Co. Louisville OH

(dd) Between on or about the following dates, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HV CONNECT INC., and other defendants and conspirators induced the following client companies to make payments to HV CONNECT INC. in the following approximate amounts:

<u>Overt Act</u>	<u>Dates</u>	<u>Client Company</u>	<u>Total Amount Paid to HV CONNECT INC.</u>
(dd)(1)	2/19/2000- 12/6/2001	Case Foods Inc. Winesburg OH	\$2,336,628.96
(dd)(2)	4/11/2000- 12/4/2001	Custom Design Technologies/Nexxstep Canton OH	\$118,729.35
(dd)(3)	8/17/2000- 6/18/2001	Renewable Energy Products Inc. Canton OH	\$2,952.23
(dd)(4)	11/14/2000- 12/12/2000	Gerber's Poultry Kidron OH	\$21,514.35
(dd)(5)	12/13/2000- 1/25/2002	Waste Parchment Inc. Millersburg OH	\$251,414.51

<u>Overt Act</u>	<u>Dates</u>	<u>Client Company</u>	<u>Total Amount Paid to HV CONNECT INC.</u>
(dd)(6)	12/15/2000-8/30/2001	International Packaging Specialties Millersburg OH	\$201,782.13
(dd)(7)	1/4/2001-10/31/2001	Cicchini/Avanti Corp. Canton OH	\$35,638.07
(dd)(8)	1/15/2001-7/11/2001	Baglieri Enterprises Hudson OH	\$33,371.39
(dd)(9)	4/6/2001-1/11/2002	Cooper Farms-Processing St. Henry OH	\$433,592.41
(dd)(10)	4/12/2001-1/28/2002	Hertzfeld Poultry Farms Inc. Waterville OH	\$358,129.44
(dd)(11)	4/16/2001-6/1/2001	Anderson-Dubose Solon OH	\$11,084.72
(dd)(12)	4/26/2001-3/6/2002	L&W Egg Products Inc. Millersburg OH	\$144,454.87
(dd)(13)	5/29/2001-10/29/2001	Amish Door Inc. Wilmot OH	\$37,982.79
(dd)(14)	6/12/2001-2/26/2002	Cooper Farms-Hatchery Oakwood OH	\$56,334.21
(dd)(15)	7/16/2001-1/23/2002	Biery Cheese Co. Louisville OH	\$162,504.08
		<b>Total Amount Paid to HV CONNECT INC.</b>	\$4,206,113.51

(ee) Between on or about the following dates, TRUNG Q. NGUYEN, AN QUOC NGUYEN, TAI VAN NGUYEN, TN JOB SERVICE, INC., and other defendants and conspirators induced the following client companies to make payments to TN JOB SERVICE, INC., in the following approximate amounts:

<u>Overt Act</u>	<u>Dates</u>	<u>Client Company</u>	<u>Total Amount Paid to TN JOB SERVICE</u>
(ee)(1)	1/25/2002-10/8/2002	Biery Cheese Co. Louisville OH	\$193,874.69
(ee)(2)	1/30/2002-10/23/2002	Hertzfeld Poultry Farms Inc. Waterville OH	\$377,701.52
(ee)(3)	2/1/2002-10/18/2002	Cooper Farms-Processing St. Henry OH	\$461,484.77
(ee)(4)	3/1/2002-10/15/2002	Cooper Farms-Hatchery Oakwood OH	\$21,554.95
(ee)(5)	3/8/2002-9/19/2002	L&W Egg Products Inc. Millersburg OH	\$108,578.98
		<b>Total Amount Paid to TN JOB SERVICE</b>	\$1,163,194.91

(ff) Between on or about March 28, 2000, and on or about September 1, 2001, TRUNG Q. NGUYEN, AN QUOC NGUYEN, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, and HV CONNECT INC. leased dwellings in Canton, Celina, Bedford Heights, Wilmot, and Defiance, Ohio, in which to house alien laborers in the Northern District of Ohio.

(gg) Between on or about March 10, 2000, and on or about September 20, 2002, in the Northern District of Ohio, TRUNG Q. NGUYEN, MSHENGA ABDY NASSEB, THAO T. NGUYEN, and HV CONNECT INC. made payments for the purchase of vehicles, repairs to vehicles, and transportation services, all for the purpose of transporting aliens in the Northern District of Ohio.

(hh) Between on or about the following dates, the following defendants maintained the following accounts at the following financial institutions:

<u>Overt Act</u>	<u>Dates</u>	<u>Defendants</u>	<u>Financial Institution</u>	<u>Account Number</u>
(hh)(1)	2/23/2000-5/31/2001	TRUNG Q. NGUYEN HON VUONG HV CONNECT INC.	Bank One	XXXXX6959
(hh)(2)	3/10/2000-3/26/2002	MSHENG A. NASSEB HV CONNECT INC.	Bank One	XXXXX5563
(hh)(3)	3/30/2000-4/13/2001	TRUNG Q. NGUYEN	Key Bank	XXXXXXXXX0604
(hh)(4)	10/19/2000-8/30/2002	TRUNG Q. NGUYEN HV CONNECT INC.	Bank One	XXXXX7064
(hh)(5)	1/31/2001-3/31/2001	TRUNG Q. NGUYEN HV CONNECT INC.	Key Bank	XXXXXXXXX1571
(hh)(6)	4/20/2001-5/8/2002	TRUNG Q. NGUYEN	First Merit	XXXXXX7652
(hh)(7)	6/5/2001-4/16/2002	THAO THI NGUYEN	Bank One	XXXXX8514
(hh)(8)	6/19/2001-9/18/2002	ABDULRAHMAN A. MTUMWA HV CONNECT INC.	Bank One	XXXX6759
(hh)(9)	1/28/2002-10/23/2002	THAO THI NGUYEN	Commerce Bank	XXXXXX9024

(ii) On or about the following dates, the following defendants made payments to the Immigration and Naturalization Service in the following approximate amounts:

<u>Overt Act</u>	<u>Date</u>	<u>Defendant</u>	<u>Amount</u>
(ii)(1)	2/29/2000	TRUNG Q. NGUYEN MSHENG ABDY NASSEB HV CONNECT INC.	\$120.00
(ii)(2)	4/11/2000	TRUNG Q. NGUYEN HV CONNECT INC.	\$120.00 (for Yunus)
(ii)(3)	4/11/2000	TRUNG Q. NGUYEN HV CONNECT INC.	\$120.00 (for Saleh)

<u>Overt Act</u>	<u>Date</u>	<u>Defendant</u>	<u>Amount</u>
(ii)(4)	12/6/2000	TRUNG Q. NGUYEN HV CONNECT INC.	\$120.00
(ii)(5)	2/14/2001	TRUNG Q. NGUYEN HV CONNECT INC.	\$245.00

(jj) On or about the following dates, the following defendants made and caused to be made wire transfers of funds in the following approximate amounts:

<u>Overt Act</u>	<u>Date</u>	<u>Defendants</u>	<u>Amount</u>	<u>From</u>	<u>To</u>
(jj)(1)	3/16/2000	HV CONNECT INC.	\$800	Bank One XXXXX6959	Dorkas Bomas Jakarta, Indonesia
(jj)(2)	4/3/2000	TRUNG Q. NGUYEN THAO THI NGUYEN HV CONNECT INC.	\$2000	Key Bank XXXXXXXXX- XX0604	THAO THI NGUYEN Vietnam
(jj)(3)	6/12/2000	HV CONNECT INC.	\$2,156	Bank One XXXXX6959	Visa First Union Bankcard
(jj)(4)	6/28/2000	HV CONNECT INC.	\$2,000	Key Bank XXXXXXXXX- XX0604	Leong Ying Singapore
(jj)(5)	7/10/2000	HV CONNECT INC.	\$6,000	Bank One XXXXX6959	Visa First Union Bankcard
(jj)(6)	7/14/2000	HV CONNECT INC.	\$7,000	Bank One XXXXX6959	Visa First Union Bankcard
(jj)(7)	7/24/2000	HV CONNECT INC.	\$2,000	Bank One XXXXX6959	Visa First Union Bankcard
(jj)(8)	7/25/2000	HV CONNECT INC.	\$1,600	Bank One XXXXX6959	Visa First Union Bankcard
(jj)(9)	8/24/2000	TRUNG Q. NGUYEN HV CONNECT INC.	\$1,200	Bank One XXXXX6959	Lee Ying Malaysia

<u>Overt Act</u>	<u>Date</u>	<u>Defendants</u>	<u>Amount</u>	<u>From</u>	<u>To</u>
(jj)(10)	10/19/2000	TRUNG Q. NGUYEN THAO THI NGUYEN HV CONNECT INC.	\$500	Key Bank XXXXXXXXX- XX0604	THAO THI NGUYEN Vietnam
(jj)(11)	10/19/2000	HV CONNECT INC.	\$6,500	Bank One XXXXX6959	Visa First Union Bankcard
(jj)(12)	12/14/2000	TRUNG Q. NGUYEN THAO THI NGUYEN HV CONNECT INC.	\$500	Key Bank XXXXXXXXX- XX0604	THAO THI NGUYEN Vietnam
(jj)(13)	12/27/2000	TRUNG Q. NGUYEN THAO THI NGUYEN HV CONNECT INC.	\$1,000	Key Bank XXXXXXXXX- XX0604	THAO THI NGUYEN Vietnam
(jj)(14)	8/22/2001	MSHENGA A. NASSEB	\$3,500	Bank One XXXXX5563	Issa Saroko Makarani Tanzania
(jj)(15)	9/11/2001	MSHENGA A. NASSEB ABDULRAHMAN A. MTUMWA	\$3,550	Bank One XXXX6759	MSHENGA A. NASSEB Tanzania
(jj)(16)	9/14/2001	MSHENGA A. NASSEB	\$3,500	Bank One XXXXX5563	Issa Saroko Makarani Tanzania
(jj)(17)	10/10/2001	MSHENGA A. NASSEB ABDULRAHMAN A. MTUMWA	\$3,500	Bank One XXXX6759	MSHENGA A. NASSEB Tanzania
(jj)(18)	11/6/2001	MSHENGA A. NASSEB	\$2,700	Bank One XXXXX5563	Mwatanga Nadoda Tanzania
(jj)(19)	3/4/2002	MSHENGA A. NASSEB ABDULRAHMAN A. MTUMWA	\$5,500	Bank One XXXX6759	MSHENGA A. NASSEB Tanzania
(jj)(20)	4/2/2002	MSHENGA A. NASSEB ABDULRAHMAN A. MTUMWA	\$5,500	Bank One XXXX6759	MSHENGA A. NASSEB Tanzania

<u>Overt Act</u>	<u>Date</u>	<u>Defendants</u>	<u>Amount</u>	<u>From</u>	<u>To</u>
(jj)(21)	4/3/2002	ABDULRAHMAN A. MTUMWA	\$3,250	Bank One XXXX6759	Feis Ali Feis Oman
(jj)(22)	5/28/2002	MSHENGA A. NASSEB ABDULRAHMAN A. MTUMWA	\$4,200	Bank One XXXX6759	MSHENGA A. NASSEB Tanzania
(jj)(23)	8/15/2002	MSHENGA A. NASSEB ABDULRAHMAN A. MTUMWA	\$4,250	Bank One XXXX6759	MSHENGA A. NASSEB Tanzania

(kk) Between on or about the following dates, utilizing check-cashing business entities in Pennsylvania and New Jersey, conspirators cashed checks written by the following client companies in the Northern District of Ohio in the following approximate total amounts, which payments represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>Overt Act</u>	<u>Date(s)</u>	<u>Total Amount</u>	<u>Client Company</u>
(kk)(1)	10/1/2001	\$1,524.02	Amish Door Inc. Wilmot, Ohio
(kk)(2)	10/1/2001	\$51,872.93	Waste Parchment Inc. Millersburg, Ohio
(kk)(3)	10/1/2001- 10/23/2002	\$572,705.74	Cooper Farms-Processing St. Henry, Ohio
(kk)(4)	12/27/2001- 10/15/2002	\$24,489.12	Cooper Farms-Hatchery Oakwood OH
(kk)(5)	12/27/2001- 9/24/2002	\$151,299.22	L&W Egg Products Inc. Millersburg OH
(kk)(6)	1/3/2002- 10/7/2002	\$209,134.94	Biery Cheese Co. Louisville OH
(kk)(7)	1/13/2002- 10/23/2002	\$468,199.26	Hertzfeld Poultry Farms Inc. Waterville OH

<u>Overt Act</u>	<u>Date(s)</u>	<u>Total Amount</u>	<u>Client Company</u>
		<b>\$1,479,225.23</b>	<b>Total Amount Through Check-Cashing Businesses</b>

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(i) and 1324(a)(1)(B)(i).

COUNT 2

(Harboring Aliens)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1, except those contained in Paragraph 1 thereof.

2. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection, such alien in any place, including a building and any means of transportation, all for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

COUNT 3

(Employing Ten and More Unauthorized Aliens)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1, except those contained in Paragraph 1 thereof.

2. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., during any 12-month period, knowingly hired for employment at least ten individuals with actual knowledge that the individuals were unauthorized aliens as defined in Title 8, United States Code, Section 1324a(h)(3), that is, with respect to the employment of those aliens at a particular time, that the aliens were not at that time either: (A) aliens lawfully admitted for permanent residence, or (B) authorized to be so employed by the Attorney General.

All in violation of Title 8, United States Code, Sections 1324(a)(3)(A) and Title 18, United States Code, Section 2.

COUNT 4

(Conspiracy to Commit Offenses Against the United States)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1, except those contained in Paragraph 1 thereof.

2. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., along with other persons whose identities are known and unknown to the Grand Jury, did knowingly and willfully conspire together and with each other to commit offenses against the United States, hereafter described, that is:

(a) Mail Fraud, in violation of Title 18, United States Code, Section 1341; and

(b) Wire Fraud, in violation of Title 18, United States Code, Section 1343.

OBJECTS OF THE CONSPIRACY

3. The objects of the conspiracy were to:

(a) defraud client companies in the Northern District of Ohio through false and fraudulent representations regarding the work eligibility status of alien employees;

(b) defraud the Ohio Bureau of Workers Compensation by failing to accurately report the number of employees, hours worked, and type of work performed;

(c) make use of false and fraudulent Alien Registration Cards;

(d) make use of false and fraudulent Social Security Account Numbers;

(e) use the United States mail and common carriers in carrying out the fraudulent scheme;

(f) use interstate wire communications, including interstate telephone calls and telefax transmissions, interstate and international wire transfers of money, and a computer internet website to carry out the fraudulent scheme; and

(g) make money which the defendants and conspirators could use for any purpose.

MANNER AND MEANS

4. Defendants and their co-conspirators employed the following manner and means to attain the objective of the conspiracy:

(a) The Grand Jury realleges, as if fully set forth herein, all of the allegations of Paragraph 3 of Count 1 of this Indictment;

(b) Defendants and conspirators presented false and fraudulent Alien Registration Cards and Social Security Account Numbers, falsely representing to client companies in the Northern District of Ohio that the Alien Registration Cards and Social

Security Account Numbers were valid and assigned to certain employees;

(c) Defendants and conspirators used the United States mail and common carriers to carry out the fraudulent scheme;

(d) Defendants and conspirators assisted alien employees in obtaining and using false means of identification.

OVERT ACTS

5. In furtherance of the conspiracy and to effect its object, defendants and their co-conspirators committed the following overt acts:

(a) The Grand Jury realleges, as if fully set forth herein, all of the allegations of Paragraph 4 of Count 1 of this Indictment; and

(b) On or about the following dates, TRUNG Q. NGUYEN and HV CONNECT INC. made payments to the Ohio Bureau of Workers Compensation in the following approximate amounts, which payments significantly underrepresented the amount HV CONNECT INC. owed the Ohio Bureau of Workers Compensation at that time:

<u>Overt Act</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount Paid</u>
(b)(1)	2/27/2001	1105	\$76.10
(b)(2)	5/2/2001	1228	\$62.11
(b)(3)	9/17/2001	1707	\$46.66

All in violation of Title 18, United States Code, Section 371.

COUNT 5

(Mail Fraud)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1, except those contained in Paragraph 1 thereof.

2. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., along with other persons whose identities are known and unknown to the Grand Jury, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, placed and caused to be placed, in a post office and authorized depository for mail matter, correspondence, to be sent and delivered by the Postal Service, and took and received therefrom said items, and knowingly caused said items to be delivered by mail according to the directions thereon.

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT 6

(Wire Fraud)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1, except those contained in Paragraph 1 thereof.

2. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., along with other persons whose identities are known and unknown to the Grand Jury, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, and pictures to-wit: fax transmissions of documents; interstate and international wire transfers of money; and maintenance of an internet website.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 7

(Money Laundering Conspiracy)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1, except those contained in Paragraph 1 thereof.

2. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., along with other persons whose identities are known and unknown to the Grand Jury, did knowingly and willfully conspire together and with each other to:

(a) conduct and attempt to conduct financial transactions involving property that represented the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

(b) conduct and attempt to conduct financial transactions involving property that represented the proceeds of specified unlawful activity, knowing that the property involved in the

financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(c) to knowingly engage and attempt to engage, in the United States, in monetary transactions affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957(a).

3. For the purpose of the preceding paragraph, the specified unlawful activity consisted of:

(a) conspiracy to transport and harbor aliens, in violation of Section 274 of the Immigration and Nationality Act (Title 8, United States Code, Section 1324(a)(1)(A)(v)(i));

(b) harboring aliens, in violation of Section 274 of the Immigration and Nationality Act (Title 8, United States Code, Section 1324(a)(1)(A)(iii));

(c) employing ten and more unauthorized aliens, in violation of in violation of Section 274 of the Immigration and Nationality Act (Title 8, United States Code, Section 1324(a)(3)(A));

(d) mail fraud, in violation of Title 18, United States Code, Section 1341; and

(e) wire fraud, in violation of Title 18, United States Code, Section 1343.

OBJECTS OF THE CONSPIRACY

4. The objects of the conspiracy were to:

(a) convert the proceeds of immigration violations, mail fraud, and wire fraud into cash that could be used to pay rents, utility bills, and transportation expenses for alien workers in order to further promote and carry on the immigration violations, mail fraud, and wire fraud;

(b) convert the proceeds of immigration violations, mail fraud, and wire fraud into cash and to conceal it within several different bank accounts so that the immigration violations, mail fraud, and wire fraud would not be detected; and

(c) convert the proceeds of immigration violations, mail fraud, and wire fraud into amounts of money greater than \$10,000 that the defendants and their co-conspirators could use for any purpose.

MANNER AND MEANS

5. Defendants and their co-conspirators employed the following manner and means to attain the objectives of the conspiracy:

(a) The Grand Jury realleges, as if fully set forth herein, all of the allegations of Paragraph 4 of Count 4 of this Indictment.

(b) During the time period referred to in paragraph 2, TRUNG Q. NGUYEN, HV CONNECT INC., and other defendants and conspirators provided aliens to work as temporary employees at various client company businesses in the Northern District of Ohio.

(c) During the time period referred to in paragraph 2, these various client companies provided payments in the form of cash and wire transfers to TRUNG Q. NGUYEN, HV CONNECT INC., and other defendants and conspirators, said payments representing the wages earned by the alien temporary employees.

(d) During the time period referred to in paragraph 2, TRUNG Q. NGUYEN, HV CONNECT INC., and other defendants and conspirators deposited the aforementioned payments into business bank accounts of HV CONNECT INC., including Bank One account numbers XXXXX6959 and XXXXX7064.

(e) During the time period referred to in Paragraph 2, the defendants and their co-conspirators and employees promoted the scheme by writing checks on the business bank accounts of HV CONNECT INC. to pay rents, utility bills, and transportation expenses for alien workers of HV CONNECT INC. and TN JOB SERVICE, INC.

(f) Defendants and their co-conspirators caused client companies to use the United States Postal Service, to mail checks and correspondence to HV CONNECT INC. and TN JOB SERVICE, INC.

(g) Defendants and their co-conspirators made and caused to be made, in interstate and foreign commerce, wire transfers of funds that represented the proceeds of immigration violations, mail fraud, and wire fraud.

(h) Defendants and their co-conspirators then deposited and caused to be deposited checks into the business bank accounts of HV CONNECT INC., as well as other bank accounts, with the intent

to disguise the nature, location, source, ownership, and control of the proceeds of immigration violations, mail fraud, and wire fraud.

(i) Defendants and their co-conspirators then withdrew and caused to be withdrawn from the business bank accounts of HV CONNECT INC. and other bank accounts funds in amounts greater than \$10,000.

(j) Defendants and their co-conspirators then wrote checks on the business bank accounts of HV CONNECT INC. and other bank accounts to obtain cash to pay alien employees to further promote the immigration violations, mail fraud, and wire fraud.

(k) Between on or about January 27, 2000, and on or about October 23, 2002, defendants TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., and their co-conspirators laundered approximately \$5,380,914.96 of the unlawfully obtained proceeds of immigration violations, mail fraud, and wire fraud through various business and personal bank accounts.

OVERT ACTS

6. In furtherance of the conspiracy and to effect its objects, in the Northern District of Ohio, Eastern Division, defendants TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., acting on their own and on behalf of HV CONNECT

INC. and TN JOB SERVICE, INC., and other conspirators committed the following overt acts:

(a) The Grand Jury realleges, as if fully set forth herein, all of the allegations of Paragraph 5 of Count 4 of this Indictment.

(b) Defendants and other conspirators engaged in the monetary transaction(s) as described in Count 8, incorporated by reference herein, which transactions were disbursements of the proceeds of immigration violations, mail fraud, and wire fraud.

(c) Between on or about the following dates, in the Northern District of Ohio, Eastern Division, conspirators wrote checks on the HV CONNECT INC. Bank One account number XXXXX6959 in the following approximate total amounts, which checks represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>Overt Act</u>	<u>Date(s)</u>	<u>Total Amount</u>	<u>Payee</u>	<u>Notes</u>
(c)(1)	3/6/2000-4/22/2000	\$18,695	First Union	TRUNG Q. NGUYEN Visa account
(c)(2)	3/6/2000	\$1,000	Navy Federal Credit Union	Deposited TRUNG Q. NGUYEN 247852700
(c)(3)	3/10/2000-10/11/2000	\$182,855	HON VUONG	
(c)(4)	6/22/2000-9/2/2000	\$34,000	Lexus Financial Services	Lexus LX470
(c)(5)	10/24/2000	\$5,000	Bank One	Open Account XXXXX7064

(d) Between on or about May 31, 2000, and on or about October 12, 2000, conspirators engaged in transactions for personal expenses, including restaurant expenses in Vietnam, casinos, and

liquor stores, using the HV CONNECT INC. Bank One account number XXXXX6959, which transactions involved the proceeds of immigration violations, mail fraud, and wire fraud.

(e) Between on or about the following dates, conspirators wrote checks on the HV CONNECT INC. Bank One account number XXXXX7064 in the following approximate total amounts, which checks represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>Overt Act</u>	<u>Date</u>	<u>Amount</u>	<u>Payee</u>	<u>Notes</u>
(e)(1)	11/4/2000-4/10/2001	\$440.00	Alexandria Employment Agency	Drivers licenses and Express Mail
(e)(2)	12/12/2000-11/1/2001	\$27,376.09	First Union	TRUNG Q. NGUYEN Visa account
(e)(4)	3/1/2001-9/27/2001	\$2,446.56	Lexus Financial Services	Lexus LX470
(e)(5)	6/23/2001-10/19/2001	\$24,000	Sybig Construction	9 Ruth Court, Absecon NJ
(e)(6)	9/14/2001	\$125.00	Ohio Secretary of State	Cert. Limited Partnership

(f) Between on or about December 4, 2000, and on or about December 2, 2001, conspirators engaged in transactions for personal expenses, including jewelry, clothing, vacation theme parks, casinos, and liquor stores, using the HV CONNECT INC. Bank One account number XXXXX7064, which transactions involved the proceeds of immigration violations, mail fraud, and wire fraud.

(g) On or about the following dates, in the Northern District of Ohio, Eastern Division, TRUNG Q. NGUYEN wrote checks on First Merit Bank account number XXXXXX7652 in the following approximate

amounts, which checks represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>Overt Act</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>	<u>Notes</u>
(g)(1)	8/10/2001	1001	\$2,000.00	Sambe Construction	Deposit on 9th Ruth, NJ
(g)(2)	9/5/2001	1002	\$15,000.00	Cash	Cashier Check
(g)(3)	9/11/2001	1004	\$119.09	Treasurer, State of Ohio	Renew 3 vehicles
(g)(5)	10/3/2001	1008	\$1,012.00	Sybig Construction	Deposit, 9th Ruth Court, Absecon NJ
(g)(6)	11/4/2001	1010	\$547.38	Sam Girlya	Deposit, 9th Ruth Court, Absecon NJ
(g)(7)	12/12/2001	1012	\$1,788.00	Illusions Custom Mirrors	Mirror installation

(h) On or about the following dates, in the Northern District of Ohio, Eastern Division, TRUNG Q. NGUYEN and THAO THI NGUYEN wrote checks on Bank One account number XXXXX8514 in the following approximate amounts, which checks represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>Overt Act</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>	<u>Notes</u>
(h)(1)	8/17/2001	103	\$3,000.00	Sybig Construction	Deposit 9th Ruth property
(h)(2)	11/23/2001	114	\$3,506.00	Sam Girlya	Deposit, 9th Ruth Court, Absecon NJ
(h)(3)	12/4/2001	116	\$14,714.92	Lexus Financial Services	Payoff Account

<u>Overt Act</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>	<u>Notes</u>
(h)(4)	12/5/2001	117	\$1,000.00	Illusions Custom Mirrors	Deposit
(h)(5)	12/19/2001	127	\$13,000.00	Cash	

(i) On or about the following dates, in the Northern District of Ohio, Eastern Division, TRUNG Q. NGUYEN and THAO THI NGUYEN wrote checks on Commerce Bank account number XXXXXX9024 in the following approximate amounts, which checks represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>Overt Act</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>	<u>Notes</u>
(i)(1)	3/1/2002	108	\$2,353.20	World Savings Bank	Mar. and April payments
(i)(2)	4/25/2002	118	\$2,000.00	World Savings Bank	Loan #XXXX1201
(i)(3)	5/22/2002	128	\$2,000.00	World Savings Bank	Loan #XXXX1201
(i)(4)	6/11/2002	134	\$96.62	Ameritech	330-491-9698 7542
(i)(5)	6/25/2002	139	\$2,000.00	World Savings Bank	Loan #XXXX1201
(i)(6)	7/9/2002	142	\$716.20	Lexus Financial Services	Acct #XXXXXX3136
(i)(7)	7/19/2002	150	\$2,000.00	World Savings Bank	Loan #XXXX1201
(i)(8)	7/30/2002	155	\$716.20	Lexus Financial Services	Acct #XXXXXX3136
(i)(9)	8/17/2002	158	\$1,176.60	World Savings Bank	

<u>Overt Act</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>	<u>Notes</u>
(i)(10)	9/6/2002	162	\$1,976.60	World Savings Bank	Loan #XXXX1201
(i)(11)	9/9/2002	164	\$716.20	Lexus Financial Services	Acct #XXXXXX3136
(i)(12)	9/20/2002	171	\$147.24	Ohio Dept. of Treasury	Renew license plates
(i)(13)	9/25/2002	173	\$2,000.00	World Savings Bank	Loan #XXXX1201
(i)(14)	10/2/2002	363	\$1,176.60	World Savings Bank	#XXXX1201
(i)(15)	10/16/2002	354	\$716.20	Lexus Financial Services	Acct #XXXXXX3136

(j) Between on or about June 23, 2001, and on or about January 4, 2002, TRUNG Q. NGUYEN and THAO THI NGUYEN contracted with Sybig C.F.S., Inc., and Sambe Construction to build a personal residence at 9 Ruth Court, Absecon, New Jersey. TRUNG Q. NGUYEN and THAO THI NGUYEN used proceeds of immigration violations, mail fraud, and wire fraud to partially pay for this residence.

(k) On or about September 25, 2001, in an application to World Savings Bank for a mortgage loan for 9 Ruth Court, Absecon, New Jersey, TRUNG Q. NGUYEN represented that: TRUNG Q. NGUYEN was the owner of TNTUSVN TRADING CO., P.O. Box 80487, Canton, Ohio and had been for four years; TRUNG Q. NGUYEN's monthly income from TNTUSVN TRADING CO. was approximately \$11,250; TRUNG Q. NGUYEN held Bank One account number XXXXX7064, which then contained approximately \$50,000; and TRUNG Q. NGUYEN held First Merit Bank

account number XXXXXX7652, which then contained approximately \$150,000. TRUNG Q. NGUYEN provided World Savings Bank with a copy of check number 1743 from the HV CONNECT INC. Bank One account number XXXXX7064, as proof of his business affiliation with HV CONNECT INC.

(1) On or about the following dates, TRUNG Q. NGUYEN and THAO THI NGUYEN wrote checks in the following approximate amounts to Sybig Construction for costs related to the construction and purchase of the personal residence at 9 Ruth Court, Absecon, New Jersey, which checks represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>Overt Act</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>	<u>Notes</u>
(1)(1)	10/5/2001	1008	\$1,012.00	Sybig Construction	Deposit, 9th Ruth Court, Absecon NJ
(1)(2)	10/19/2001	1804	\$9,200	Sybig Construction	Deposit
(1)(3)	10/19/2001	1805	\$1,700	Sybig Construction	Deposit

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 8

(Money Laundering)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, all of the allegations of Count 1, except those contained in Paragraph 1 thereof.

2. Beginning on or about January 27, 2000, the exact date being unknown to the Grand Jury, and continuing through on or about October 23, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., along with other persons whose identities are known and unknown to the Grand Jury, knowingly engaged in and attempted to engage in a monetary transaction affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity, in that on or about the following dates, the following defendants made deposits and wrote checks, and caused deposits to be made and checks to be written in the following approximate amounts, which deposits and checks represented the proceeds of immigration violations, mail fraud, and wire fraud:

<u>No.</u>	<u>Date</u>	<u>Defendant</u>	<u>Acct No.</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>
(a)	6/22/00	TRUNG Q. NGUYEN HV CONNECT INC.	Bank One XXXXX6959	1112	\$17,000.00	Lexus of Akron- Canton
(b)	6/23/01	TRUNG Q. NGUYEN HV CONNECT INC.	Bank One XXXXX7064	1525	\$13,100.00	Sybig Constr.
(c)	9/5/01	TRUNG Q. NGUYEN	First Merit XXXXXXX7652	1002	\$15,000.00	Cashiers check
(d)	11/6/01	TRUNG Q. NGUYEN HV CONNECT INC.	Sun National Bank	Deposit	\$28,096.62	Deposit to Girlyya account

<u>No.</u>	<u>Date</u>	<u>Defendant</u>	<u>Acct No.</u>	<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>
(e)	12/4/01	TRUNG Q. NGUYEN THAO THI NGUYEN	Bank One XXXXX8514	116	\$14,714.92	Lexus Financial Services
(f)	12/19/01	TRUNG Q. NGUYEN THAO THI NGUYEN	Bank One XXXXX8514	127	\$13,000.00	Cash

All in violation of Title 18, United States Code, Sections 1957(a) and 2.

**FORFEITURE ALLEGATIONS**

**IMMIGRATION VIOLATION FORFEITURE ALLEGATION**

The Grand Jury further charges:

1. The allegations contained in Counts 1 through 3 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 8, United States Code, Section 1324(b) and Title 28, United States Code, Section 2461(c).

Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that, in the event of any defendant's conviction under Counts 1 through 3 of this indictment, the United States will seek the forfeiture of the following properties as part of any sentence: a.) all conveyances [including any vehicles] that were used in the commission of the violations contained in Counts 1 through 3; b.) the gross proceeds of such violations; and, c.) all property traceable to such conveyances and proceeds.

2. **Money judgment.** The defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., shall forfeit property, including but not limited to, a sum of money equal to the gross proceeds [approximately \$5,380,914.96] of each offense set forth in Counts 1 through 3 for which the defendant is convicted.

3. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 8, United States Code, Section 1324(b) and Title 28, United States Code, Section 2461(c).

MAIL FRAUD/WIRE FRAUD FORFEITURE ALLEGATION

The Grand Jury further charges:

1. The allegations contained in Counts 4 through 6 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that, in the event of any defendant's conviction under Counts 4 through 6 of this indictment, the United States will seek the forfeiture of the following property as part of any sentence: all property, real and personal, which constitutes or is derived from proceeds traceable

to the violations contained in Counts 4 through 6.

2. **Money judgment.** The defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., shall forfeit property, including but not limited to, a sum of money equal to the gross proceeds [approximately \$5,380,914.96] of each offense set forth in Counts 4 through 6 for which the defendant is convicted.

3. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

MONEY LAUNDERING FORFEITURE ALLEGATION

The Grand Jury further charges:

1. The allegations contained in Counts 7 and 8 of this indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1). Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that, in the event of any defendant's conviction under Counts 7 and 8 of this indictment, the United States will seek the forfeiture of the following property as part of any sentence: all property, real and personal, involved in the violations contained in Counts 7 and 8.

2. **Money Judgment.** The defendants, TRUNG Q. NGUYEN, AN QUOC NGUYEN, HON VUONG, MSHENGA ABDY NASSEB, RIDHA BOUGHALMI, ASHRAF M. ABDELWAHED, ABDULRAHMAN A. MTUMWA, THAO THI NGUYEN, TAI VAN NGUYEN, HV CONNECT INC., and TN JOB SERVICE, INC., shall forfeit property, including but not limited to, a sum of money equal to the total amount of money [approximately \$5,380,914.96] involved in each offense set forth in Counts 7 and 8 for which the defendant is convicted.

3. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

SUBSTITUTE PROPERTY

1. Pursuant to Title 21, United States Code, Section 853(p), each defendant shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant, the property described above, or any portion thereof:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

United States v. Trung Q. Nguyen, et al.

A TRUE BILL.

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FOREPERSON

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CRAIG S. MORFORD  
ACTING UNITED STATES ATTORNEY