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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

GUIA CABACTULAN,
MARISSA DUENAS, and
AMANDA ESTOPARE,

Defendants.

No. **LA CR20-00079-TJH**

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy; 18
U.S.C. § 981(a)(1)(C) and 28
U.S.C. § 2461(c): Criminal
Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

A. THE ORGANIZATIONS

1. The Kingdom of Jesus Christ, The Name Above Every Name ("KOJC") was a church that was founded on or about September 1, 1985 in Davao, Philippines. KOJC claimed to have approximately six million members in approximately 200 countries.

2. In or around 1998, KOJC developed the Children's Joy Foundation ("CJF"). According to the website <https://cjfusa.org/about/>, CJF was "a nonprofit organization helping

1 children around the world through school sponsorships, feeding and
2 housing programs."

3 3. According to information filed with the Internal Revenue
4 Service, in or around 2007, KOJC began operating CJF in the United
5 States as a registered non-profit charity under Title 26, United
6 States Code, Section 501(c)(3). CJF was registered in the state of
7 California as a foreign non-profit with its principal office located
8 at 127 South Brand Boulevard, Glendale, California 91204.

9 4. KOJC owned and operated the property that included its
10 church and main office within the United States, located at the 14400
11 block of Vanowen Street, Van Nuys, California 91405 ("KOJC
12 Compound"). KOJC also maintained an office located at 14500 Roscoe
13 Boulevard, Fourth Floor, Office #20, Panorama City, California 91402
14 and a storage unit located at 6900 Van Nuys Boulevard, Unit 3103, Van
15 Nuys, California 91405.

16 5. Inside the KOJC Compound was an office operated by KOJC
17 administrators, including defendants GUIA CABACTULAN, MARISSA DUENAS,
18 and AMANDA ESTOPARE (collectively the "defendants").

19 B. THE DEFENDANTS

20 6. The defendants were the main KOJC administrators in the
21 United States and were in charge of organizing the solicitation
22 activities of KOJC workers in the United States. The defendants
23 lived and worked at the KOJC Compound, where they held the following
24 responsibilities for KOJC:

25 a. Defendant CABACTULAN was the lead KOJC administrator
26 in the United States and, along with other KOJC administrators
27 located in the Philippines, directed the activities of both
28 defendants DUENAS and ESTOPARE. Defendant CABACTULAN operated the

1 KOJC Compound and maintained direct communication with KOJC
2 leadership in the Philippines. Defendant CABACTULAN was previously
3 in charge of tracking and reporting the money raised by KOJC workers
4 in the United States to KOJC administrators located in the
5 Philippines until in or around 2015, when defendant ESTOPARE took
6 over this role for her.

7 b. Defendant DUENAS was the human resources leader of
8 KOJC in the United States and was responsible for collecting and
9 securing the passports and immigration-related documents from KOJC
10 workers in order to prevent KOJC workers from freely accessing their
11 passports and immigration-related documents. Defendant DUENAS also
12 handled fraudulent immigration-related documents for KOJC workers,
13 including applying for sham marriages and student visas obtained on
14 behalf of KOJC workers in order to allow the workers to remain in the
15 United States to solicit on behalf of KOJC.

16 c. Defendant ESTOPARE was in charge of tracking and
17 reporting the money raised by KOJC workers in the United States to
18 KOJC administrators located in the Philippines. Defendant ESTOPARE
19 provided daily solicitation quotas for KOJC workers to meet and would
20 direct the flow of solicited funds from the United States to KOJC
21 administrators in the Philippines.

22 C. NONIMMIGRANT VISAS

23 7. A citizen of a foreign country who wished to enter the
24 United States generally was required to first obtain a visa from the
25 United States Government: either a nonimmigrant visa for temporary
26 stay, or an immigrant visa for permanent residence. Visitor visas
27 were nonimmigrant visas for persons who wanted to enter the United
28 States temporarily for business (visa category B-1), for tourism,

1 pleasure, or visiting (B-2), for both purposes (B-1/B-2), or to
2 attend school in the United States (F or M). An individual in the
3 United States on a visitor visa (B-1/B-2) was not permitted to accept
4 employment or work in the United States.

5 8. In order to apply for a nonimmigrant business and/or
6 tourist visa, an applicant was required to complete and submit a
7 Nonimmigrant Visa Application and schedule an appointment for a visa
8 interview. Generally, the visa interview would take place at a
9 United States Embassy/Consulate in a foreign country.

10 9. In order to apply for a student visa, an applicant was
11 required to have a foreign residence and must intend to return to
12 that residence upon completion of his or her studies. While on a
13 student visa, the student was required to study at the academic
14 institution through which the visa was granted. In general, student
15 visa holders were allowed to hold off-campus employment only if the
16 employment was related to his or her area of study and was approved
17 by United States Customs and Immigration Services.

18 10. Receiving a nonimmigrant visa from the United States
19 Government was a privilege, not a right. In order to be granted a
20 nonimmigrant visa to visit the United States, applicants were
21 required to overcome the presumption in the United States Immigration
22 and Nationality Act that all visa applicants are immigrants who
23 intend to remain in the United States.

24 11. These Introductory Allegations are incorporated into the
25 sole count of this Indictment.
26
27
28

1 [18 U.S.C. § 371]

2 [ALL DEFENDANTS]

3 A. OBJECTS OF THE CONSPIRACY

4 12. Beginning on a date unknown, but no later than in or around
5 May 2010, and continuing to on or about January 29, 2020, in Los
6 Angeles County, within the Central District of California, and
7 elsewhere, defendants GUIA CABACTULAN, MARISSA DUENAS, and AMANDA
8 ESTOPARE, and others known and unknown to the Grand Jury, conspired
9 with each other to knowingly and intentionally commit offenses
10 against the United States, namely:

11 a. Trafficking with Respect to Forced Labor, in violation
12 of Title 18, United States Code, Section 1590(a);

13 b. Document Servitude, in violation of Title 18, United
14 States Code, Section 1592(a)(3);

15 c. Immigration Fraud, in violation of Title 18, United
16 States Code, Section 1546(a); and

17 d. Marriage Fraud, in violation of Title 8, United States
18 Code, Section 1325(c).

19 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE

20 ACCOMPLISHED

21 13. The objects of the conspiracy were to be accomplished, in
22 substance, as follows:

23 a. Defendants CABACTULAN, DUENAS, and ESTOPARE, and
24 others known and unknown to the Grand Jury, would knowingly recruit,
25 harbor, and obtain KOJC workers for labor and services by concealing,
26 removing, confiscating, and possessing the passports and other
27 immigration and identification documents, of such KOJC workers.

28 b. Defendants CABACTULAN, DUENAS, and ESTOPARE, and

1 others known and unknown to the Grand Jury, would do so to prevent
2 and restrict, and attempt to prevent and restrict, without lawful
3 authority, KOJC workers' liberty to move and travel in order to
4 maintain the labor and services of KOJC workers, some of whom were
5 and had been a victim of a severe form of trafficking in persons
6 through fraud and coercion for the purpose of subjection to
7 involuntary servitude and peonage, as defined in Section 103 of the
8 Trafficking Victims Protection Act of 2000.

9 c. Defendants CABACTULAN, DUENAS, and ESTOPARE, and
10 others known and unknown to the Grand Jury, would coordinate to have
11 KOJC workers, who were previously recruited as KOJC members from the
12 Philippines, admitted into the United States by obtaining United
13 States nonimmigrant visas under false pretenses. Specifically,
14 defendants CABACTULAN, DUENAS, and ESTOPARE, and others known and
15 unknown to the Grand Jury, would instruct KOJC workers to state to
16 immigration authorities and in immigration-related documents that
17 they were traveling to the United States to perform in church-related
18 concerts, when in fact, the primary purpose of the travel to the
19 United States was for KOJC workers to beg for and solicit donations
20 across the country under the guise of being CJF "volunteers."

21 d. Defendants CABACTULAN and DUENAS, and others known and
22 unknown to the Grand Jury, would provide KOJC workers with prepared
23 responses and letters to provide to immigration authorities upon
24 arrival into the United States in an effort to avoid detection. The
25 prepared responses and letters stated, in substance, that the KOJC
26 workers would be performing as vocalists or instrumentalists at KOJC
27 concerts, and did not reference soliciting on behalf of KOJC. At the
28 time KOJC workers received the prepared responses and letters, some

1 of the KOJC workers were aware that their purpose for entering into
2 the United States was to solicit on behalf of KOJC, while other KOJC
3 workers were unaware of the actual purpose until they were forced by
4 defendants CABACTULAN, DUENAS, and ESTOPARE to solicit on the streets
5 nearly every day, year-round, working very long hours, and often
6 sleeping in cars overnight, without normal access to over-the-counter
7 medicine or even clothes.

8 e. Once KOJC workers arrived in the United States,
9 defendants CABACTULAN and DUENAS, and others known and unknown to the
10 Grand Jury, would confiscate the passports and other immigration-
11 related documentation from them and store the documents at, among
12 other locations, the KOJC Compound. KOJC workers were allowed to
13 access their immigration-related documents only if traveling on
14 behalf of KOJC or if KOJC workers provided a justification for
15 needing their immigration-related documents that defendants
16 CABACTULAN and DUENAS, and others known and unknown to the Grand
17 Jury, found acceptable. Defendants CABACTULAN, DUENAS, and ESTOPARE,
18 and others known and unknown to the Grand Jury, would confiscate all
19 forms of identification from each KOJC worker and provide the KOJC
20 worker with a badge that identified the worker as a "volunteer" with
21 CJF.

22 f. Defendants CABACTULAN, DUENAS, and ESTOPARE, and
23 others known and unknown to the Grand Jury, would transport KOJC
24 workers across the country to solicit donations as CJF "volunteers."
25 These "volunteers" were referred to as Full Time Workers, or "FTWs."
26 KOJC workers fundraised on behalf of KOJC nearly every day, year-
27 round, working very long hours, and often sleeping in cars overnight,
28 despite many of the KOJC workers being prohibited from doing so by

1 the terms and conditions of their visas.

2 g. Defendants CABACTULAN, DUENAS, and ESTOPARE arranged
3 for KOJC workers to be housed in communal living conditions at the
4 KOJC Compound and in other locations across the United States, with
5 multiple KOJC workers housed in shared rooms and under poor
6 conditions.

7 h. Defendants CABACTULAN, DUENAS, and ESTOPARE, and
8 others known and unknown to the Grand Jury, instructed KOJC workers
9 to solicit on behalf of CJF, but not to mention KOJC. Defendants
10 CABACTULAN, DUENAS, and ESTOPARE, and others known and unknown to the
11 Grand Jury, provided KOJC workers with CJF pamphlets, and instructed
12 KOJC workers to falsely inform the public that the money was used to
13 aid impoverished Filipino children.

14 i. Defendants CABACTULAN and ESTOPARE, and others known
15 and unknown to the Grand Jury, would set daily cash solicitation
16 quotas for KOJC workers. These daily quotas were increased during
17 the months of September/October through January/February of the
18 following year for a period referred to as the Month of Blessings or
19 MOB. KOJC workers who failed to meet their daily solicitation quota
20 were often punished by KOJC administrators, including defendant
21 ESTOPARE, by being yelled at, shamed, berated, physically abused, or
22 forced to fast, i.e., abstain from food, while being locked in a room
23 at the KOJC Compound. KOJC workers in the United States would be
24 organized into fundraising groups across the United States. While
25 soliciting, any expenses, such as food, lodging, and medical
26 expenses, came out of the group's fundraising quota for that day.
27 For that reason, KOJC workers often skipped meals and slept in their
28 vehicles while fundraising on behalf of KOJC.

1 j. KOJC workers reported their fundraising totals to
2 their group leader, who then reported the totals to defendant
3 ESTOPARE through text message, Facebook, or other means of
4 communication. Defendant ESTOPARE would also receive updates from
5 group leaders on the performance of individual KOJC workers and steps
6 that were being taken for KOJC workers to meet their solicitation
7 quotas.

8 k. Defendant ESTOPARE provided instructions via text
9 message, Facebook, or other means of communication, regarding what to
10 do with the solicited money collected each day. Defendant ESTOPARE
11 would often instruct KOJC workers to deposit the cash into accounts
12 and then wire transfer the money to other KOJC workers located in the
13 Philippines who were designated to receive the money by KOJC
14 administrators.

15 l. Defendants CABACTULAN, DUENAS, and ESTOPARE, and
16 others known and unknown to the Grand Jury, would seek to maintain
17 United States immigration status for KOJC workers who proved capable
18 of meeting the cash solicitation quotas by obtaining student visas
19 for such KOJC workers, or by arranging for such KOJC workers to enter
20 into sham marriages with other KOJC workers who had already obtained
21 United States citizenship, for the purpose of evading the immigration
22 laws.

23 m. Defendants CABACTULAN and DUENAS arranged for KOJC
24 workers who entered into such fraudulent marriages to then apply for
25 United States legal permanent residence status and citizenship based
26 on the fraudulent marriages. Defendants CABACTULAN and DUENAS
27 completed and filed fraudulent marriage paperwork on behalf of KOJC
28 workers and arranged for the KOJC workers to be transported to a set

1 location for a sham marriage ceremony. Defendants CABACTULAN,
2 DUENAS, and ESTOPARE paid legal and document-processing fees for the
3 fraudulent immigration filings, using funds drawn from KOJC accounts.
4 After KOJC workers who had entered into fraudulent marriages obtained
5 United States citizenship, defendants CABACTULAN and DUENAS arranged
6 for KOJC workers to divorce their respective spouses, so that they
7 could then enter into fraudulent marriages with other KOJC workers
8 who had not obtained United States permanent residency or
9 citizenship.

10 n. In order to perpetuate the appearance of legitimacy
11 for the fraudulent marriages, defendant DUENAS possessed ATM cards to
12 show immigration authorities that KOJC workers in the fraudulent
13 marriages had joint banking accounts, and defendants CABACTULAN and
14 DUENAS possessed male and female wedding rings for KOJC workers to
15 use during fraudulent marriage ceremonies.

16 o. Defendants CABACTULAN and DUENAS enrolled other KOJC
17 workers at colleges in the United States. Defendants CABACTULAN and
18 DUENAS then applied for such KOJC workers to obtain United States
19 student visas in order for the KOJC workers to remain in the United
20 States. Defendants CABACTULAN and DUENAS, and other known and
21 unknown to the Grand Jury, completed and filed the college enrollment
22 paperwork for those student visas. Defendants CABACTULAN, DUENAS,
23 and ESTOPARE paid the tuition for those KOJC workers, using funds
24 drawn from KOJC bank accounts. KOJC workers attended college
25 approximately one day a week, but would otherwise spend their time
26 soliciting money on behalf of KOJC.

27 p. Defendants CABACTULAN and DUENAS, and others known and
28 unknown to the Grand Jury, would coordinate the transfer of money

1 raised by KOJC workers to the KOJC Compound by either physically
2 picking up the money at locations across the country, or by arranging
3 for the money to be wire transferred to a KOJC member in the
4 Philippines. Defendant ESTOPARE instructed KOJC workers to make cash
5 deposits of less than \$9,000 into bank accounts used for the wire
6 transfers, in order to avoid detection from banks.

7 q. For the money that was physically transferred to the
8 KOJC Compound, defendant ESTOPARE, and others known and unknown to
9 the Grand Jury, would provide KOJC workers approximately \$9,000 in
10 cash to carry when they returned to the Philippines. The money would
11 be rolled into socks and placed in the luggage and on the person of
12 KOJC members flying on commercial aircraft to the Philippines from
13 the United States, or in bulk amounts stored in private jets operated
14 by KOJC members.

15 r. Money solicited in the United States, although
16 advertised by KOJC and CJF as designated to aid impoverished Filipino
17 children, would be used to directly finance KOJC operations in the
18 Philippines and United States, as directed by certain individuals
19 associated with KOJC, and the lavish lifestyle of KOJC leaders.

20 C. OVERT ACTS

21 14. In furtherance of the conspiracy, and to accomplish its
22 objects, on or about the following dates, defendants CABACTULAN,
23 DUENAS, and ESTOPARE, and others known and unknown to the Grand Jury,
24 committed various overt acts within the Central District of
25 California, and elsewhere, including, but not limited to, the
26 following:

27 Overt Act No. 1: In or around May 2010, defendant CABACTULAN
28 confiscated the passports of Victim C and her two children and stored

1 the documents at the KOJC Compound upon Victim C joining KOJC.

2 Overt Act No. 2: In or around 2013, defendant CABACTULAN
3 confiscated the passport of Victim A and stored the document at the
4 KOJC Compound upon Victim A's arrival in the United States to solicit
5 donations as a KOJC worker.

6 Overt Act No. 3: On or about September 25, 2014, defendant
7 DUENAS sent an email to other KOJC members, in which defendant DUENAS
8 stated, "[A]ttached herewith is the list of FTW's [full time workers]
9 bound to USA via LAX and SF and List of FTW's bound USA via JFK New
10 York. I already sent to the tickets for FTW's via LAX and SF to
11 [names omitted] . . . We will also send [yo]u later a series of
12 probable questions and answers; just in case they will be ask by the
13 immigration officer upon entry. Their answers must coincide with the
14 office, just in case we receive an inquiry or call. We are finishing
15 it now because [defendant CABACTULAN] will be answering the phone."

16 Overt Act No. 4: On or about October 24, 2014, defendant
17 ESTOPARE sent an email titled "format" containing a Microsoft Excel
18 spreadsheet for KOJC workers to report the amount of money raised.

19 Overt Act No. 5: On or about August 7, 2015, defendant DUENAS
20 sent an email containing an attached document titled "MULTIPLE VISA
21 FTMWS and THEIR AVE.docx" that included columns titled "Name in USA,"
22 "Status," "Ave.Income," and "Area." The columns contained a list of
23 93 KOJC workers, each KOJC worker's status in the United States, and
24 the average money raised by each KOJC worker per day.

25 Overt Act No. 6: On or about October 11, 2015, defendant
26 ESTOPARE sent an email to other KOJC members titled "2015 mob plan"
27 that contained guidance for KOJC workers who were involved in
28 soliciting funds for KOJC, including the drivers, coordinators, and

1 solicitors.

2 Overt Act No. 7: On or about October 24, 2015, defendant
3 ESTOPARE received an email from a KOJC group leader, with the subject
4 line "OCTOBER2302115FR," providing a daily tally of money raised by
5 KOJC workers of \$2,777.

6 Overt Act No. 8: On or about December 27, 2015, defendant
7 ESTOPARE sent an email titled "names send thru moneygram" that
8 provided the names of KOJC workers located in the Philippines that
9 other KOJC workers were to wire transfer money to.

10 Overt Act No. 9: On or about January 20, 2016, defendant
11 DUENAS sent a template letter on KOJC letterhead to other KOJC
12 members via email, addressed to the "Honorable Consul, United States
13 of America." The "RE" line read, "RE: Invitation for [blank] as
14 GUEST for the LIVE Concert Crusade in UNITED STATES OF AMERICA." The
15 body of the letter stated that the person named in the "RE" line was
16 "one of our special guest for this Kingdom's Concert Crusade, [and]
17 his presence in the concert schedule is deemed important. Thus, the
18 Kingdom's USA Chapter is sponsoring his stay in the country from
19 [blank] to [blank] covering food and travel accommodation for the
20 whole duration of the event."

21 Overt Act No. 10: On or about March 28, 2016, defendant DUENAS
22 applied for a United States F1 student visa on behalf of Victim H and
23 enrolled her in college at the California University of Business and
24 Technology in order for Victim H to remain in the United States and
25 solicit on behalf of KOJC.

26 Overt Act No. 11: In or around December 2016, defendants
27 CABACTULAN and DUENAS, and others known and unknown to the Grand
28 Jury, arranged for Victim B to marry another KOJC worker, who was a

1 United States citizen and with whom Victim B had no romantic
2 relationship, for the sole purpose of enabling Victim B to obtain
3 legal permanent resident status based on the marriage. In order to
4 effectuate the marriage, defendant DUENAS, and others known and
5 unknown to the Grand Jury, facilitated the completion of marriage
6 paperwork on behalf of Victim B and arranged for Victim B to attend a
7 marriage ceremony in Los Angeles, California.

8 Overt Act No. 12: On or about April 26, 2017, defendant
9 DUENAS, and others known and unknown to the Grand Jury, facilitated
10 the completion of a Form I-130, Petition for Alien Relative, on
11 behalf of Victim B, based on Victim B's fraudulent marriage, in order
12 for Victim B to obtain legal permanent resident status.

13 Overt Act No. 13: On or about March 27, 2018, defendants
14 CABACTULAN and DUENAS refused to provide Victim C with her Green Card
15 until Victim C wrote and signed a letter stating, among other things,
16 that all of her work at KOJC was voluntary.

17 Overt Act No. 14: On or about June 19, 2018, defendant
18 ESTOPARE, using a bank account in the name of "The Executive Pastor
19 of the Kingdom of Jesus Christ TNAEN," paid \$1,200 to Francis
20 University for the tuition of Victim N.

21 Overt Act No. 15: On or about June 26, 2018, defendant
22 CABACTULAN, using a bank account in the name of "The Executive Pastor
23 of the Kingdom of Jesus Christ TNAEN," paid \$2,450 to California
24 University of Business and Technology for "Praya tuition fee."

25 Overt Act No. 16: On or about August 17, 2018, defendant
26 CABACTULAN, using a bank account in the name of "The Executive Pastor
27 of the Kingdom of Jesus Christ TNAEN," paid \$1,375 to Liberty Legal
28 Document Services for "[Victim O] - citizenship."

1 Overt Act No. 17: On or about September 26, 2018, defendant
2 ESTOPARE, using a bank account in the name of "The Executive Pastor
3 of the Kingdom of Jesus Christ TNAEN-TN," paid \$2,435 to Liberty
4 Legal Document Services for the processing of immigration-related
5 documents.

6 Overt Act No. 18: On or about April 12, 2019, defendant
7 DUENAS, using a bank account in the name of "Marissa A Duenas," paid
8 \$1,500 to Liberty Legal Document Services for "lawyers representation
9 fee" for Victims N and P.

10 Overt Act No. 19: On or about November 18, 2019, defendant
11 DUENAS, using a bank account in the name of "KLC of Kern County,"
12 paid \$400 to Francis University for the tuition of Victim N.

13 Overt Act No. 20: On or about January 29, 2020, defendants
14 CABACTULAN and DUENAS possessed approximately 72 Filipino passports,
15 seven United States passports, and one Ukrainian passport in names
16 other than the defendants, in an office at the KOJC Compound.

17 Overt Act No. 21: On or about January 29, 2020, defendant
18 DUENAS possessed approximately four male wedding rings and
19 approximately three female wedding rings in an office at the KOJC
20 Compound.

21 Overt Act No. 22: On or about January 29, 2020, defendant
22 DUENAS possessed a memorandum, dated March 6, 2018, titled "Financial
23 Goal for 2018," that listed the total fundraising goal for KOJC in
24 the United States as 23,050,000 Philippine Pesos.

25 Overt Act No. 23: On or about January 29, 2020, defendant
26 DUENAS possessed a file titled "Traitor" that contained information
27 on KOJC members who fled from KOJC.
28

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offense set forth the sole count of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) all right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any defendant so convicted shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property

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1 described in the preceding paragraph or any portion thereof (a)
2 cannot be located upon the exercise of due diligence; (b) has been
3 transferred, sold to, or deposited with a third party; (c) has been
4 placed beyond the jurisdiction of the court; (d) has been
5 substantially diminished in value; or (e) has been commingled with
6 other property that cannot be divided without difficulty.

7
8 A TRUE BILL

9
10
11 Foreperson */s/*

12 NICOLA T. HANNA
United States Attorney

13 *Brandon Fox*

14 BRANDON D. FOX
15 Assistant United States Attorney
16 Chief, Criminal Division

17 BENJAMIN R. BARRON
Assistant United States Attorney
18 Chief, Santa Ana Branch Office

19 DANIEL H. AHN
Assistant United States Attorney
20 Deputy Chief, Santa Ana Branch
Office

21 JAKE D. NARE
Assistant United States Attorney
22 Santa Ana Branch Office