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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

February 2009 Grand Jury

09CR 3265

JAH

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JASON CAVIN (1),
15 CONNIE MARIE HOLMES (2),
16 BRANDON PETE LANDRY (3),
17 NEDRA FAY LANDRY (4),
18 GERALDO MONTAZ (5),
19 JESUS RODRIGUEZ (6),
20 MIKE WASELESKI (7),

21 Defendants.

) Criminal Case No. _____

) I N D I C T M E N T

) Title 18, U.S.C., Sec. 371 -
) Conspiracy; Title 18, U.S.C.,
) Sec. 1167 - Conspiracy to Commit
) Theft from Gaming Establishments
) on Indian Lands; Title 18,
) U.S.C., Sec. 1510 - Conspiracy
) to Obstruct a Criminal
) Investigation; Title 18, U.S.C.,
) Sec. 1952 - Conspiracy to Travel
) in Interstate and Foreign
) Commerce in Aid of Racketeering;
) Title 18, U.S.C., Sec. 2314 -
) Conspiracy to Transport Stolen
) Property in Interstate and
) Foreign Commerce; Title 18,
) U.S.C., Sec. 2315 - Conspiracy
) to Receive, Possess, Conceal,
) Store, Sell and Dispose of
) Stolen Property that has
) Traveled in Interstate and
) Foreign Commerce

24 The grand jury charges:

25 GENERAL ALLEGATIONS

26 At all times material to this Indictment:

27 //

28 //

JKW:RST:nlv(1):San Diego,
8/31/09

1 **A. Gaming Facilities**

2 1. Beau Rivage Casino was a casino licensed by the State of
3 Mississippi with gross annual revenues of over \$1,000,000 for 2004 and
4 2005. In 2004 and 2005, the casino was engaged in interstate commerce
5 and its activities affected interstate commerce.

6 2. Cache Creek Indian Bingo and Casino was an Indian gaming
7 facility operated by the Rumsey Indian Rancheria of Wintun Indians of
8 California, a federally recognized Indian Tribe. The United States
9 government holds lands in trust for the benefit of the tribe in the
10 vicinity of Brooks, California. The government of the tribe oversees
11 operation of these facilities on federal trust lands under its
12 jurisdiction. Gaming operated in the jurisdiction of the tribe was
13 authorized by tribal ordinance, which was approved by the NIGC on
14 January 28, 1994, and amended December 18, 1998, in accordance with
15 the IGRA.

16 3. The Foxwoods Resort Casino was an Indian gaming facility
17 operated by the Mashantucket Pequot Indian Tribe, a federally
18 recognized Indian Tribe. The United States government holds lands in
19 trust for the benefit of the tribe in the vicinity of Ledyard,
20 Connecticut. The government of the Tribe oversees operation of this
21 facility on federal trust lands under its jurisdiction. Gaming
22 operated in the jurisdiction of the tribe was authorized by tribal
23 ordinance, which was approved by the NIGC on February 7, 1995, in
24 accordance with the IGRA.

25 4. Harrah's Casino, located in Lake Charles, Louisiana, was a
26 casino licensed by the State of Louisiana with gross annual revenues
27 of over \$1,000,000 for 2005. In 2005, the casino was engaged in
28 interstate commerce and its activities affected interstate commerce.

1 5. Horseshoe Casino and Hotel was a casino licensed by the
2 State of Mississippi with gross annual revenues of over \$1,000,000 for
3 2006. In 2006, the casino was engaged in interstate commerce and its
4 activities affected interstate commerce.

5 6. Isle of Capri Casino, located in Westlake, Louisiana, was
6 a casino licensed by the State of Louisiana with gross annual revenues
7 of over \$1,000,000 for 2003, 2004, 2005, and 2006. In 2003, 2004,
8 2005, and 2006, the casino was engaged in interstate commerce and its
9 activities affected interstate commerce.

10 7. Mohegan Sun Casino was an Indian gaming facility operated
11 by the Mohegan Indian Tribe of Connecticut, a federally recognized
12 Indian Tribe. The United States government holds lands in trust for
13 the benefit of the tribe in the vicinity of Uncasville, Connecticut.
14 The government of the Tribe oversees operation of this facility on
15 federal trust lands under its jurisdiction. Gaming operated in the
16 jurisdiction of the tribe was authorized by tribal ordinance, which
17 was approved by the NIGC on November 8, 1994, in accordance with the
18 IGRA.

19 8. Pechanga Resort & Casino was an Indian gaming facility
20 operated by the Pechanga Band of Luiseno Mission Indians, a federally
21 recognized Indian Tribe. The United States government holds lands in
22 trust for the benefit of the tribe in the vicinity of Temecula,
23 California. The government of the tribe oversees operation of these
24 facilities on federal trust lands under its jurisdiction. Gaming
25 operated in the jurisdiction of the tribe was authorized by tribal
26 ordinance, which was approved by the NIGC on April 12, 1994, in
27 accordance with the IGRA.

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1 9. Resorts East Chicago Hotel and Casino was a casino licensed
2 by the State of Indiana with gross annual revenues of over \$1,000,000
3 for 2005. In 2005, the casino was engaged in interstate commerce and
4 its activities affected interstate commerce.

5 10. The Sycuan Resort and Casino was an Indian gaming facility
6 operated by the Sycuan Band of the Kumeyaay Nation, a federally
7 recognized Indian Tribe. The United States government holds lands in
8 trust for the benefit of the tribe in the vicinity of El Cajon,
9 California. The government of the tribe oversees operation of these
10 facilities on federal trust lands under its jurisdiction. Gaming
11 operated in the jurisdiction of the tribe was authorized by tribal
12 ordinance, which was approved by the NIGC on November 8, 1994, and
13 amended on August 30, 2006, in accordance with the IGRA.

14 **B. Description of Blackjack**

15 11. The object in the game of blackjack is for the player to
16 draw cards with a value that total twenty-one or come closer to twenty
17 one than the dealer. All cards count at face value, except for jacks,
18 queens, and kings which count as ten, and the ace which counts as
19 either one or eleven, at the player's option.

20 12. Blackjack usually is played with between one to six full
21 decks of cards, which are shuffled by a dealer and dealt from a
22 "shoe,"--a rectangular box designed to hold several decks of cards,
23 with a slot at the front that allows a dealer to quickly draw one card
24 at a time). After players have completed placing their bets, the
25 dealer will give each player two cards. The dealer will receive two
26 cards, one face up and one face down (known as the "hole card").

27 13. If the initial two cards are an ace and a ten-value card,
28 the hand is a "blackjack." A blackjack beats any other combination

1 of cards except another blackjack. If both the player and the dealer
2 have blackjack, the hand is a "push," and the player neither wins nor
3 loses.

4 14. After the players have received their initial two cards,
5 they can choose to "stand" (draw no more cards), or take a "hit" (draw
6 1 or more cards). If the player's card total exceeds twenty-one, they
7 "break" and automatically lose.

8 15. After all the players have finished drawing to their hands,
9 the dealer will expose his hole card. The dealer must draw an
10 additional card if his point total is sixteen or less and must stand
11 if he has seventeen or more.

12 16. If the dealer breaks, the remaining players who have not
13 broken automatically win. If the dealer's point total is less than
14 the player's point total, the player wins. If the dealer's point
15 total is more than the player's, the player loses. If the dealer and
16 the player have the same point total, the hand is a "push", and the
17 player neither wins nor loses.

18 17. All winning bets are paid even money (one dollar in winnings
19 for ever dollar bet) except blackjacks (point totals of twenty-one)
20 which are paid at odds of three to two.

21 18. If a blackjack player were to follow a perfect strategy, the
22 proven odds for blackjack are approximately forty-nine to fifty-one
23 in favor of the casino.

24 **C. Description of Mini-Baccarat**

25 19. In mini-baccarat, like regular baccarat, two hands are
26 dealt—one called the "banker's hand" and the other called the
27 "player's hand." Players at a table bet prior to a hand being dealt
28 and bet on which of the two hands they believe will win. The winning

1 hand is the hand that, under the rules of the game, comes closest to
2 the total of nine. The rules do not allow the player or the dealer
3 any discretion in deciding when to hold or draw on a hand.
4 Consequently, the result of each hand is in no way affected by
5 personal decisions by the dealer or players in the game.

6 20. Mini-baccarat usually is played with six to eight full decks
7 of cards, which are shuffled by a dealer and dealt from a shoe. Up
8 to nine players can be seated at the table. At some casinos,
9 additional bettors, known as "back-bettors," can stand behind players.
10 Play begins when the player's hand and banker's hand are dealt from
11 the shoe. Usually, only two hands are dealt regardless of the number
12 of players at the table. Each hand initially consists of two cards.
13 The rules of the game determine whether a third card is dealt to
14 either hand. Neither the players nor the dealer have any discretion
15 in determining whether to hold or to deal a third card to a hand.

16 21. The first four cards are dealt from the shoe in alternating
17 order, with the result being that the first and third cards are dealt
18 to the player's hand, while the second and fourth cards are dealt to
19 the banker's hand. Mini-baccarat game rules dictate whether a fifth
20 or sixth card is necessary and whether the cards are dealt to the
21 player's hand and/or banker's hand, respectively. All cards count as
22 face value except tens and face cards, which have a value of zero.
23 For example, an ace equals one and a five equals five. If the total
24 or "point count" of the cards in a hand is a two-digit number, the
25 left digit is disregarded and the right digit constitutes the point
26 count (for example, the point count for a hand consisting of the
27 following 2 cards, an 8 and a 6, would be 4 after dropping the left
28 digit from the sum total of 14).

1 22. Players bet prior to a hand being dealt and have three
2 betting options: Betting on the player's hand, betting on the
3 banker's hand, or betting on a tie. All winning bets on the player's
4 hand or banker's hand are paid at odds of one to one, while the odds
5 on a tie bet are paid at odds of nine to one. The winning hand is the
6 one under the rules of the game that comes closest to the total point
7 count of nine. The Casino provides mini-baccarat scorecards for
8 players to use. A typical and legitimate player use of a scorecard
9 is to record "runs," i.e., a series of player's or banker's winning
10 hands, for the player's use in making betting decisions. Tracking
11 play in this manner, however, has no bearing on, and provides no
12 insight, into the statistical outcome of the game.

13 23. All of the cards dealt in a hand of mini-baccarat are placed
14 into the discard rack in a specific order. The dealer slides the
15 cards from dealer's right hand to his or her left, face up with the
16 first card on the right on the bottom and the last card on the left
17 on the top. The dealer then turns the cards face down and places them
18 into the discard rack. The same procedure is followed for each hand
19 until all the cards are dealt from the shoe. Consequently, knowing
20 the order of the cards going into the discard rack allows a player who
21 is tracking cards to know the order that the tracked cards will come
22 out of the shoe if those cards are not shuffled.

23 Count 1

24 18 U.S.C. § 371

25 (Conspiracy to Commit Offenses Against the United States)

26 1. The allegations contained in paragraphs one through twenty-
27 three of the General Allegations are realleged and incorporated by
28 reference as if fully set forth herein.

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1 2. From in or about March 2002 and continuing to on or about
2 July 2006, within the Southern District of California and elsewhere,
3 defendants JASON CAVIN, CONNIE MARIE HOLMES, BRANDON PETE LANDRY,
4 NEDRA FAY LANDRY, GERALDO MONTAZ, JESUS RODRIGUEZ, and MIKE WASELESKI,
5 and the following coconspirators charged elsewhere; Phuong Quoc
6 Truong, aka "Pai Gow" John and John Truong, Van Thu Tran, Tai Khiem
7 Tran, Anh Phuong Tran, Phat Ngoc Tran, Martin Lee Aronson, aka Martin
8 Smith, Liem Thanh Lam, George Michael Lee, Tien Duc Vu, Son Hong
9 Johnson, Barry Wellford, Nam Van To, aka "Tommy", Khai Hong Tran, John
10 Tran, Willy Tran, aka "Duy", Tuan Mong Le, Duc Cong Nguyen, Han Truong
11 Nguyen, Ha Thuy Giang, aka "Thuy Ha Giang," Roderick Vang Thor, Phally
12 Ly, Sisouvanh Mounlasy, Navin Nith, Hop Nguyen, Renee Cuc Quang, Bryan
13 Arce, Khunsela Prom aka "Danny Prom," Dan Thich, James Root, Don Man
14 Duong, Thang Viet Huynh, Leap Kong aka "Lanida Kong," Qua Le, Hogan
15 Ho, Outtama Keovongsa, Darrell Saicocie, Ui Suk Weller, and Eric
16 Isbell, and the following coconspirators whose initials are H. K., J.
17 O., S. N., B. Y., and L. M., and a card dealer whose first initial is
18 G., did knowingly, willfully, and unlawfully conspire, confederate and
19 agree with each other and other persons known and unknown to the grand
20 jury, to commit the following crimes against the United States:

21 a. To abstract, purloin, and willfully misapply, and take
22 and carry away with intent to steal, money, funds, assets, and other
23 property of a value in excess of \$1,000 belonging to a gaming
24 establishment operated by and for, and licensed by an Indian Tribe
25 pursuant to an ordinance and resolution approved by the National
26 Indian Gaming Commission; in violation of Title 18, United States
27 Code, Section 1167(b);

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1 b. To use bribery to obstruct, delay, and prevent the
2 communication of information relating to a violation of any criminal
3 statute of the United States by any person to a criminal investigator;
4 in violation of Title 18, United States Code, Section 1510;

5 c. To travel and cause travel in interstate and foreign
6 commerce, and use a facility in interstate and foreign commerce, with
7 intent to promote, manage, establish, carry on, and facilitate the
8 promotion, management, establishment, and carrying on, of unlawful
9 activity, to wit: a business enterprise involving gambling, and
10 bribery; in violation of the law of the States of California,
11 Connecticut, Indiana, Louisiana, Mississippi, and thereafter perform
12 and attempt to perform said unlawful activity; in violation of
13 Title 18, United States Code, Section 1952;

14 d. To transport, transmit, and transfer in interstate and
15 foreign commerce goods, wares, merchandise, securities, and money of
16 the value of \$5,000 and more, knowing the same to have been stolen,
17 converted, and taken by fraud; in violation of Title 18, United States
18 Code, Section 2314; and

19 e. To receive, possess, conceal, store, barter, sell, and
20 dispose of goods, wares, and merchandise, securities, and money, of
21 the value of \$5,000 and more, which have crossed a state and United
22 States boundary after being stolen, unlawfully converted, and taken,
23 knowing the same to have been stolen, unlawfully converted, and taken;
24 in violation of Title 18, United States Code, Section 2315;

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

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1 **A. Purposes of the Conspiracy**

2 3. The purposes of the conspiracy included the following:

3 a. Enriching the defendants and members and associates of
4 the conspiracy through, among other things, the theft of money from
5 both Indian and non-Indian casinos and gaming establishments by
6 cheating at gambling; bribing casino employees and officials to
7 facilitate cheating at gambling; using hidden microphones and cellular
8 telephones to secretly transmit information that enabled the
9 conspiracy and its associates to cheat at gambling; transporting
10 stolen money and property worth \$5,000 and more across state and
11 international borders; receiving, possessing, concealing, and
12 disposing of such stolen money and property after it crossed state and
13 United States boundaries, knowing the same to have been stolen,
14 unlawfully converted, and taken before crossing such boundaries;

15 b. Acquiring real and personal property for the members
16 and associates of the conspiracy in the United States and abroad;

17 c. Preserving and protecting the territory and profits of
18 the conspiracy through the use of bribes and financial incentives;

19 d. Promoting and enhancing the conspiracy and its members'
20 and associates' activities; and

21 e. Impeding investigation of the card-cheating conspiracy
22 by law enforcement authorities.

23 **B. Manner and Means of the Conspiracy**

24 4. Among the manner and means by which the members and
25 associates of the Tran Organization conducted and participated in the
26 conduct of the affairs of the card-cheating conspiracy were the
27 following:

28 //

1 a. It was part of the conspiracy, that after developing
2 the card-cheating scheme, coconspirators Phuong Quoc Truong, Van Thu
3 Tran, Tai Khiem Tran, and other coconspirators, would recruit and
4 train other individuals to participate in the card-cheating scheme.
5 The table games at which the Tran Organization usually performed the
6 card-cheating schemes were mini-baccarat and blackjack.

7 b. It was further part of the conspiracy that the members
8 and associates of the conspiracy would usually execute the card-
9 cheating scheme as follows: First, a member or members of the Tran
10 Organization would recruit and bribe a dealer from a casino to perform
11 the false shuffle, that is, to fail to shuffle or interlace cards
12 properly after they have been dealt from the shoe, and before they are
13 shuffled and returned to the shoe for the next round of hands. By
14 failing to shuffle cards, the dealer would create a "slug," or group
15 of cards in the same order that they had been dealt in the previous
16 game. This enabled the members and associates of the conspiracy to
17 track the cards in the slug and predict the order in which they were
18 dealt in the next game.

19 c. It was further part of the conspiracy that the members
20 and associates of the conspiracy would offer the dealer money for each
21 successful false shuffle the dealer performed. They also would train
22 the dealer to perform the false shuffle without being detected by
23 casino security. Occasionally, members of the Tran Organization would
24 also bribe casino floor supervisors and pit bosses to assist in the
25 card-cheating scheme.

26 d. It was further part of the conspiracy that after
27 successfully bribing and training a dealer, several members of the
28 Tran Organization would go to the casino and begin to play mini-

1 baccarat or blackjack at the table where the coconspirator dealer was
2 stationed to work. One coconspirator participated in the game as a
3 player (the "card recorder"), who would record the values of at least
4 a portion of the cards dealt in the regular course of play from the
5 shoe. During mini-baccarat games, the card recorder usually would
6 record the value of the cards on a paper form the casino provided to
7 mini-baccarat players in the normal course of play. In blackjack
8 games, the card recorder would use a hidden transmitter or microphone
9 and a cellular telephone to relay the order of cards to a another
10 coconspirator, who would enter the order of the cards into a computer
11 loaded with a specially designed card-tracking computer program.

12 e. It was further part of the conspiracy that after
13 dealing all of the cards in the shoe, the dealer would create a slug
14 of cards that a member of the Tran Organization had recorded, by the
15 dealer performing a false shuffle.

16 f. It was further part of the conspiracy that the dealer
17 would next place the complete deck of cards, including the slug, back
18 into the shoe and begin dealing the next series of hands. The card
19 recorder then would look for "indicator cards" at the start of the
20 slug. After finding the slug, the card recorder would determine the
21 subsequent order of cards to be played from the shoe. The card
22 recorder then would use mini-baccarat or blackjack rules to calculate
23 the winner of the subsequent hands. The card recorder would signal
24 to other coconspirator players at the table to dramatically increase
25 the size of their bets on the predicted winning hands. Typically, the
26 players would win several successive hands during the course of one
27 card-cheating scheme at a casino. Executing the scheme in this

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1 fashion, the Tran Organization would frequently steal approximately
2 \$50,000 in approximately 10 minutes of play.

3 g. It was further part of the conspiracy that the Tran
4 Organization would not always succeed in winning money when they
5 attempted to execute the card-cheating scheme. Mistakes in executing
6 the card-cheating scheme and mistakes made by the coconspirator dealer
7 or the card recorder would cause the Tran Organization to lose large
8 amounts of money in a short period of time. Additionally, the Tran
9 Organization sometimes lost bets intentionally to avoid suspicion.

10 h. It was further part of the conspiracy that after
11 successfully cheating a casino in a blackjack or mini-baccarat game,
12 the Tran Organization would have various members and associates cash
13 out their gambling chips, often in amounts under \$10,000 to avoid
14 federally regulated casino cash transaction reporting requirements.
15 After collecting the winnings, the members and associates of the
16 conspiracy who participated in the game as players would typically
17 turn over their winnings to a member of the Tran Organization, who
18 would, in turn, pay the participating players a smaller amount of
19 money for participating in the scheme.

20 i. It was further part of the conspiracy that the members
21 and associates of the conspiracy would bribe and attempt to bribe
22 casino and gaming establishment employees and officials to execute the
23 card-cheating scheme and take actions contrary to the interests of
24 their employers.

25 j. It was further part of the conspiracy that the members
26 and associates of the Tran Organization would travel in interstate and
27 foreign commerce to facilitate and promote the affairs of their
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1 illegal gambling business and to promote and facilitate the bribery
2 of casino employees and officials.

3 k. It was further part of the conspiracy that the members
4 and associates of the Tran Organization would use bribes to deter
5 witnesses from informing casino and gaming establishment officials,
6 as well as law enforcement officials, about the activities of the
7 conspiracy and its members and associates.

8 l. It was further part of the conspiracy that the members
9 and associates of the Tran Organization would create rules and
10 procedures to be followed by all members and associates involved in
11 the card-cheating schemes, in order to maximize the effectiveness of
12 the conspiracy.

13 m. It was further part of the conspiracy that the members
14 and associates of the Tran Organization would train others in the
15 card-cheating schemes of the conspiracy and to follow the rules and
16 procedures they developed, including, but not limited to, training
17 card dealers to perform false shuffles, training card trackers to
18 track the order of cards as they were dealt from a shoe, and training
19 players to follow cues as to when and how much to bet on particular
20 hands.

21 n. It was further part of the conspiracy that the members
22 and associates of the Tran Organization would scout casinos and gaming
23 establishments in order to determine their level of vulnerability to
24 the card-cheating scheme.

25 o. It was further part of the conspiracy that the members
26 and associates of the Tran Organization would use concealed electronic
27 transmitters and specially developed software to transmit and track
28 the order of cards during blackjack and mini-baccarat games, in order

1 to predict and transmit to other members and associates the order of
2 cards as they were dealt after coconspirator dealers performed false
3 shuffles.

4 p. It was further part of the conspiracy that the members
5 and associates of the conspiracy would impede investigation of the
6 conspiracy by law enforcement authorities.

7 Overt Acts

8 In furtherance of the conspiracy and to effect and accomplish the
9 objects thereof, the following overt acts, among others, were
10 committed within the Southern District of California, and elsewhere:

11 1. On or about March of 2002, within the Southern District of
12 California, coconspirators Phuong Quoc Truong, Van Thu Tran, and Tai
13 Khiem Tran developed a false-shuffle technique designed to enable
14 them, with the assistance of corrupt casino dealers, to cheat at
15 gambling and thereby steal money from casinos.

16 2. On or about August 2002, at the direction of coconspirators
17 Phuong Quoc Truong, Van Thu Tran, and Tai Khiem Tran, a coconspirator,
18 whose initials are H. K., traveled from Canada to the Southern
19 District of California for the purpose of joining the Tran
20 Organization and engaging in the card-cheating scheme at the Pechanga
21 Resort and Casino, in Temecula, California (hereinafter "Pechanga
22 Casino"); and Cache Creek Indian Bingo and Casino, in Brooks,
23 California (hereinafter "Cache Creek Casino").

24 3. On or about August 2002, within the Southern District of
25 California, coconspirators Phuong Quoc Truong, Van Thu Tran, and Tai
26 Khiem Tran recruited coconspirator H. K. to participate in the card
27 cheating scheme at Pechanga Casino.

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1 4. On or about August 2002, at the behest of coconspirators
2 Phuong Quoc Truong, Van Thu Tran, Tai Khiem Tran, and Khai Hong Tran,
3 coconspirator H. K. and other unidentified conspirators participated
4 in a card cheat at Pechanga Casino.

5 5. Beginning on or about August 2002 through in or about
6 December 2002, coconspirator Tai Khiem Tran and other members of the
7 Tran Organization cheated at gambling at Cache Creek Casino; and
8 Sycuan Resort and Casino, located in El Cajon, California (hereinafter
9 "Sycuan Casino").

10 6. On or about October 2002, at the direction of coconspirators
11 Phuong Quoc Truong, Van Thu Tran, and Tai Khiem Tran, coconspirator
12 H. K. traveled from Canada to Sacramento, California, for the purposes
13 of cheating at gambling at Cache Creek Casino.

14 7. On or about late 2002, coconspirator Tai Khiem Tran again
15 contacted coconspirator H. K. and requested that H. K. travel to
16 San Diego, California, to participate in the Tran Organization's card
17 cheating scheme at Sycuan Casino.

18 **Isle of Capri Casino, in Westlake, Louisiana 2003 - 2005**

19 8. On several occasions, beginning in or about October 2003,
20 and continuing through in or about April 2005, coconspirators Phuong
21 Quoc Truong, Martin Lee Aronson, Tien Duc Vu, Son Hong Johnson, Tuan
22 Mong Le, Duc Cong Nguyen, Han Truong Nguyen, Hogan Ho, Hop Nguyen,
23 Thang Viet Huynh, and other unidentified coconspirators, traveled
24 across state lines, to Louisiana, for the purpose of executing the
25 card-cheating scheme at the Isle of Capri Casino, in Westlake,
26 Louisiana (hereinafter "Isle of Capri Casino Westlake").

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1 9. On or about September 27, 2003, defendant JASON CAVIN flew
2 across state lines, to San Diego, California, at the direction of
3 coconspirator Phuong Quoc Truong and other unidentified
4 coconspirators, to receive training for the card-cheating scheme, in
5 furtherance of the card-cheating scheme.

6 10. On or about September 2003, in San Diego, California, in the
7 Southern District of California, defendant JASON CAVIN received
8 training for the card-cheating scheme, at the direction of Phuong Quoc
9 Truong and other unidentified coconspirators, in furtherance of the
10 card-cheating scheme.

11 11. Prior to executing the false shuffle card-cheating scheme,
12 defendant NEDRA FAY LANDRY flew across state lines, to San Diego,
13 California, at the direction of coconspirator Phuong Quoc Truong and
14 other unidentified coconspirators, to receive training for the card-
15 cheating scheme, in furtherance of the card-cheating scheme

16 12. Prior to executing the false shuffle card-cheating scheme,
17 defendant NEDRA FAY LANDRY received training for the card-cheating
18 scheme, in San Diego, California, in the Southern District of
19 California, at the direction of coconspirator Phuong Quoc Truong and
20 other unidentified coconspirators, in furtherance of the card-cheating
21 scheme.

22 **Chart of Additional Overt Acts at Isle of Capri Casino Westlake**

23 Beginning on or about October 2003, and continuing through in or
24 about April 2005, Isle of Capri Casino Westlake dealer defendants
25 JASON CAVIN, NEDRA FAY LANDRY, and CONNIE MARIE HOLMES, and other
26 unidentified coconspirators, executed the false shuffle card-cheating
27 scheme, at the direction of coconspirators Phuong Quoc Truong, Martin
28 Lee Aronson, Tien Duc Vu, Son Hong Johnson, Tuan Mong Le, Duc Cong

1 Nguyen, Han Truong Nguyen, Hogan Ho, Hop Nguyen, Thang Viet Huynh, and
 2 other unidentified coconspirators, and enabled the coconspirators
 3 to take the following money from the Isle of Capri Casino Westlake:

Overt Act	Date, on or about	Name	Approximate Dollar Amount
13.	10/10/03	Son Hong Johnson	\$16,500
14.	10/10/03	Han Truong Nguyen	\$16,700
15.	10/18/03	Han Truong Nguyen	\$20,000
16.	11/1/03	Hogan Ho	\$18,200
17.	11/1/03	Son Hong Johnson	\$26,825
18.	12/20/03	Son Hong Johnson	\$20,700
19.	12/20/03	Han Truong Nguyen	\$27,800
20.	12/20/03	Thang Viet Huynh	\$13,130
21.	12/25/03	Hogan Ho	\$19,875
22.	12/28/03	Son Hong Johnson	\$18,455
23.	12/28/03	Thang Viet Huynh	\$17,375
24.	1/11/04	Son Hong Johnson	\$17,300
25.	1/11/04	Thang Viet Huynh	\$11,775
26.	1/23/04	Hogan Ho	\$19,050
27.	1/23/04	Han Truong Nguyen	\$14,650
28.	2/18/04	Son Hong Johnson	\$35,815
29.	2/19/04	Thang Viet Huynh	\$11,835

1	30.	2/19/04	Hogan Ho	\$27,775
2	31.	2/21/04	Han Truong Nguyen	\$19,650
3	32.	3/3/04	Son Hong Johnson	\$22,650
4	33.	3/18/04	Han Truong Nguyen	\$15,675
5	34.	3/20/04	Thang Viet Huynh	\$24,400
6	35.	4/2/04	Son Hong Johnson	\$43,105
7	36.	4/2/04	Han Truong Nguyen	\$24,295
8	37.	4/2/04	Thang Viet Huynh	\$16,225
9	38.	4/2/04	Hogan Ho	\$23,610
10	39.	5/15/04	Han Truong Nguyen	\$22,600
11	40.	5/15/04	Thang Viet Huynh	\$20,015
12	41.	5/16/04	Son Hong Johnson	\$29,300
13	42.	5/18/04	Duc Cong Nguyen	\$13,500
14	43.	8/31/04	Hop Nguyen	\$35,900
15	44.	9/10/04	Hop Nguyen	\$15,088
16	45.	9/13/04	Duc Cong Nguyen	\$16,320
17	46.	9/15/04	Hop Nguyen	\$36,200
18	47.	10/2/04	Duc Cong Nguyen	\$23,850
19	48.	1/17/05	Tien Duc Vu	\$20,000
20	49.	2/6/05	Tuan Mong Le	\$14,100
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50.	2/6/05	Tien Duc Vu	\$26,000
51.	2/28/05	Martin Lee Aronson	\$10,400
52.	4/11/05	Tuan Mong Le	\$30,660

Beau Rivage Casino, in Biloxi, Mississippi

53. On or about September 2004, defendant JASON CAVIN introduced coconspirator Phuong Quoc Truong to a coconspirator, whose initials are J. O., to assist with the recruitment of dealers employed at Beau Rivage Casino, located in Biloxi, Mississippi (hereinafter "Beau Rivage Casino"), in furtherance of the card-cheating scheme.

54. On or about September 2004, coconspirator Phuong Quoc Truong caused a coconspirator, whose initials are J. O., to recruit a Beau Rivage Casino card dealer, whose initials are S. N., to perform false shuffles.

55. Between on or about September 2004, and in or about February 2005, defendant BRANDON PETE LANDRY executed the card-cheating scheme, at the direction of coconspirator Phuong Quoc Truong and other unidentified coconspirators, to take money from Beau Rivage Casino.

56. On or about February 4, 2005, coconspirators Phuong Quoc Truong, Phat Ngoc Tran, Willy Tran, Tien Duc Vu, Eric Isbell, and other unidentified coconspirators caused card dealer S. N. to perform a false shuffle at blackjack table #13, pit #1, at a Beau Rivage Casino, creating a slug of approximately fifty-one cards, that enabled coconspirator Eric Isbell and another coconspirator, whose initials are M. M., and at least two other unidentified coconspirators, to execute the card-cheating scheme and take approximately \$56,100 from the casino.

1 57. On or about February 4, 2005, coconspirator Tien Duc Vu
2 cashed out gambling chips for approximately \$66,000 at Beau Rivage
3 Casino.

4 **Mohegan Sun Casino, in Uncasville, Connecticut**
5 **and Foxwoods Resort Casino, in Ledyard,--Connecticut**

6 58. On several occasions, beginning in or about January 2005,
7 and continuing through in or about April 2005, defendant BRANDON PETE
8 LANDRY and coconspirators Phuong Quoc Truong, Tien Duc Vu, Son Hong
9 Johnson, Duc Cong Nguyen, Han Truong Nguyen, and other unidentified
10 coconspirators, traveled across state lines, to Connecticut, for the
11 purpose of executing the card-cheating scheme at the Mohegan Sun
12 Casino, in Uncasville, Connecticut (hereinafter "Mohegan Sun Casino")
13 and the Foxwoods Resort Casino in Ledyard, Connecticut (hereinafter
14 "Foxwoods Casino").

15 59. Between on or about January 2005, and in or about April
16 2005, defendant BRANDON PETE LANDRY executed the card-cheating scheme,
17 at the direction of coconspirator Phuong Quoc Truong and other
18 unidentified coconspirators, to take money from Foxwoods Casino.

19 60. Beginning on or about January 2005, and continuing through
20 in or about April 2005, Mohegan Sun Casino dealers defendants GERALDO
21 MONTAZ and JESUS RODRIGUEZ, executed the false shuffle card-cheating
22 scheme, at the direction of coconspirators Phuong Quoc Truong, Tien
23 Duc Vu, Son Hong Johnson, Duc Cong Nguyen, Han Truong Nguyen, and
24 other unidentified coconspirators, and enabled the coconspirators to
25 take the following money from Mohegan Sun Casino:

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Overt Act	Date, on or about	Name	Approximate Dollar Amount
61.	January 11, 2005	Duc Cong Nguyen	\$28,200
62.	February 1, 2005	Duc Cong Nguyen	\$104,325
63.	February 22, 2005	Son Hong Johnson	\$60,375
64.	March 8, 2005	Tien Duc Vu	\$78,000
65.	March 8, 2005	Duc Cong Nguyen	\$70,200
66.	March 28, 2005	Tien Duc Vu	\$126,600
67.	April 2, 2005	Han Truong Nguyen	\$69,200
68.	April 5, 2005	Han Truong Nguyen	\$35,225

Harrah's Casino in Lake Charles, Louisiana

69. On or about May 2005, defendant BRANDON PETE LANDRY recruited a card dealer, with a first initial "G" (hereinafter "Card Dealer G"), employed by Harrah's Casino, located in Lake Charles, Louisiana (hereinafter "Harrah's Casino"), at the direction of coconspirator Phuong Quoc Truong, in furtherance of the card-cheating scheme.

70. On or about May 2005, coconspirator Son Hong Johnson purchased an airline ticket for Card Dealer G, to travel across state lines to San Diego, California.

71. On or about May 2005, Card Dealer G flew across state lines, to San Diego, California, for the purpose of being trained, by coconspirator Martin Lee Aronson and other unidentified coconspirators, to perform the false shuffle, in furtherance of the card-cheating scheme.

1 72. On or about May 2005, coconspirator Phuong Quoc Truong and
2 unidentified coconspirators paid Card Dealer G approximately \$1,000.

3 **Resorts East Chicago Hotel and Casino, East Chicago, Indiana**

4 73. On several occasions, beginning in or about May 2005, and
5 continuing through in or about October 2005, coconspirators Phuong
6 Quoc Truong, Martin Lee Aronson, Son Hong Johnson, Duc Cong Nguyen,
7 Han Truong Nguyen, Thang Viet Huynh, and other unidentified
8 coconspirators, traveled across state lines, to Indiana, for the
9 purpose of executing the card-cheating scheme at Resorts East Chicago
10 Hotel and Casino in East Chicago, Indiana (hereinafter "Resorts East
11 Chicago Casino").

12 74. Prior to executing the false shuffle card-cheating scheme,
13 defendant MIKE WASELESKI flew across state lines, to Houston, Texas,
14 at the direction of coconspirator Phuong Quoc Truong and other
15 unidentified coconspirators, to receive training for the card-cheating
16 scheme, in furtherance of the card-cheating scheme.

17 75. Prior to executing the false shuffle card-cheating scheme,
18 defendant MIKE WASELESKI received training for the card-cheating
19 scheme, in Houston, Texas, at the direction of coconspirator Phuong
20 Quoc Truong and other unidentified coconspirators, in furtherance of
21 the card-cheating scheme.

22 76. Beginning on or about May 2005, and continuing through in
23 or about August 2005, Resorts East Chicago Casino card dealer
24 defendant MIKE WASELESKI, and other unidentified coconspirators,
25 executed the false shuffle card-cheating scheme, at the direction of
26 coconspirators Phuong Quoc Truong, Martin Lee Aronson, Son Hong
27 Johnson, Duc Cong Nguyen, Han Truong Nguyen, Thang Viet Huynh,

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1 and other unidentified coconspirators, and enabled the coconspirators
2 to take the following money from Resorts East Chicago Casino:

Overt Act	Date, on or about	Name	Approximate Dollar Amount
77.	May 31, 2005	Duc Cong Nguyen	\$61,100
78.	June 16, 2005	Han Truong Nguyen	\$102,650
79.	July 5, 2005	Duc Cong Nguyen	\$106,100

9 80. On or about August 7, 2005, defendant MIKE WASELESKI
10 performed a false shuffle at the direction of coconspirators Phuong
11 Quoc Truong, Son Hong Johnson, Thang Viet Huynh and other unidentified
12 coconspirators, at mini-baccarat table #506, at Resorts East Chicago
13 Casino, creating a slug that enabled coconspirators Phuong Quoc
14 Truong, Thang Viet Huynh, and Son Hong Johnson, to execute the card-
15 cheating scheme and take approximately \$376,200 from the casino.

16 81. On or about August 7, 2005, coconspirator Thang Viet Huynh
17 cashed out gambling chips for approximately \$132,200 at Resorts East
18 Chicago Casino.

19 82. On or about August 7, 2005, coconspirator Son Hong Johnson
20 cashed out gambling chips for approximately \$300,000 at Resorts East
21 Chicago Casino.

22 **Isle of Capri Casino, in Westlake, Louisiana 2006**

23 83. On or about June 15, 2006, coconspirators Phuong Quoc
24 Truong, Liem Thanh Lam, Barry Wellford, and Willy Tran, and other
25 unidentified coconspirators drove from coconspirator Phuong Quoc
26 Truong's and Van Thu Tran's house in Houston, Texas, to Westlake,
27 Louisiana, for the purpose of executing the card-cheating scheme.

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1 84. On or about June 15, 2006, just before midnight,
2 coconspirator Phuong Quoc Truong caused a card dealer, whose initials
3 are B. Y., to perform a false shuffle at blackjack table #201, at the
4 Isle of Capri Casino, in Westlake, Louisiana (hereinafter "Isle of
5 Capri Casino Westlake"), in furtherance of the card-cheating scheme.

6 85. On or about June 15, 2006, through June 16, 2006,
7 coconspirators Phuong Quoc Truong, Liem Thanh Lam, Barry Wellford,
8 Willy Tran, and Renee Cuc Quang, and other unidentified coconspirators
9 unsuccessfully attempted to execute the false shuffle card-cheating
10 scheme at blackjack table #201, at the Isle of Capri Casino, causing
11 the Tran Organization to lose approximately \$50,000, including
12 expenses.

13 86. On or about June 25, 2006, defendant NEDRA FAY LANDRY agreed
14 to assist coconspirator Phuong Quoc Truong in recruiting dealers,
15 employed at the Isle of Capri Casino Westlake, to participate in the
16 card-cheating scheme.

17 87. On or about June 28, 2006, defendant NEDRA FAY LANDRY agreed
18 to assist coconspirator Phuong Quoc Truong in recruiting a dealer,
19 employed at the Isle of Capri Casino Westlake, to participate in the
20 card-cheating scheme.

21 **Horseshoe Casino and Hotel, in Tunica, Mississippi**

22 88. On July 14, 2006, coconspirator Phuong Quoc Truong flew from
23 San Diego, California, to Houston, Texas, for the purpose of executing
24 the false shuffle card-cheating scheme at the Horseshoe Casino in
25 Tunica, Mississippi (hereinafter "Horseshoe Casino").

26 89. On July 15, 2006, coconspirators Martin Lee Aronson and Son
27 Hong Johnson flew from San Diego, California, to Houston, Texas,

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1 aboard Southwest Airlines flight 1162, for the purpose of executing
2 the false shuffle card-cheating scheme at the Horseshoe Casino.

3 90. On July 16, 2006, coconspirator Willy Tran flew from
4 San Diego, California, to Houston, Texas, aboard Southwest Airlines
5 flight 1162, for the purpose of executing the false shuffle
6 card-cheating scheme at the Horseshoe Casino.

7 91. On July 18, 2006, defendant BRANDON PETE LANDRY and
8 coconspirators Phuong Quoc Truong, Son Hong Johnson, Phat Ngoc Tran,
9 Willy Tran, Barry Wellford, Martin Lee Aronson, and other unidentified
10 coconspirators, caused card dealer L. M. to perform a false shuffle
11 at a blackjack table, at the Horseshoe Casino, creating a slug that
12 enabled defendant BRANDON PETE LANDRY and coconspirators Phuong Quoc
13 Truong, Son Hong Johnson, Phat Ngoc Tran, Willy Tran, Barry Wellford,
14 Martin Lee Aronson, and other unidentified coconspirators, to execute
15 the false shuffle card-cheating scheme and take money from the casino.

16 92. On or about July 18, 2006, coconspirator Son Hong Johnson
17 cashed out gambling chips for approximately \$19,000 at Horseshoe
18 Casino.

19 93. On or about July 19, 2006, coconspirator Phuong Quoc Truong
20 instructed coconspirator Phat Ngoc Tran to pay card dealer L. M.
21 approximately \$500 for participating in the false shuffle
22 card-cheating scheme executed at the Horseshoe Casino on or about
23 July 18, 2006.

24 94. On or about July 19, 2006, coconspirator Phat Ngoc Tran paid
25 card dealer L. M. approximately \$500 for participating in the false
26 shuffle card-cheating scheme executed at the Horseshoe Casino on or
27 about July 18, 2006.

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Additional Recruiting Overt Acts

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95. On or about May 2, 2006, defendant CONNIE MARIE HOLMES agreed to assist coconspirator Phuong Quoc Truong in recruiting dealers, to participate in the card-cheating scheme.

96. On or about May 2, 2006, defendant CONNIE MARIE HOLMES agreed to assist coconspirator Phuong Quoc Truong in the card-cheating scheme as a card dealer.

97. On or about June 14, 2006, defendant CONNIE MARIE HOLMES agreed to assist coconspirators Phuong Quoc Truong and Phat Ngoc Tran in recruiting a dealer, to participate in the card-cheating scheme.

98. On or about June 18, 2006, defendant JASON CAVIN agreed to assist coconspirator Phuong Quoc Truong in recruiting a dealer, to participate in the card-cheating scheme.

99. Prior to June 24, 2006, defendant BRANDON PETE LANDRY recruited an unidentified coconspirator cousin to participate in the card-cheating scheme.

100. On or about July 13, 2006, defendant BRANDON PETE LANDRY agreed to assist coconspirator Phuong Quoc Truong in recruiting a dealer, to participate in the card-cheating scheme.

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1 101. Prior to July 18, 2006, defendant NEDRA FAY LANDRY attempted
2 to recruit a dealer to participate in the card-cheating scheme.

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

4 DATED: September 1, 2009.

5 A TRUE BILL:-

6
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8
9
10 KAREN P. HEWITT
United States Attorney

11 BRUCE G. OHR
12 Chief, Organized Crime
and Racketeering Section
13 Department of Justice

14 
15 JOSEPH K. WHEATLEY
Trial Attorney, Department of Justice

16 
17 ROBERT S. TULLY
18 Trial Attorney, Department of Justice

19
20
21
22 I hereby attest and certify on 09-01-09
23 That the foregoing document is a full, true and correct
24 copy of the original on file in my office and in my legal
custody.

25 CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

26 By  Deputy
27
28