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5  
 6 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

7 -oOo-

8 UNITED STATES OF AMERICA,  
 9  
 Plaintiff,

10 vs.

11 **WEI SENG PHUA,**  
 12 **DARREN WAI KIT PHUA,**  
**SENG CHEN YONG,**  
 13 **WAI KIN YONG,**  
**HUI TANG,**  
 14 **YAN ZHANG,**  
**YUNG KEUNG FAN,**  
 15 **HERMAN CHUN SANG YEUNG,**

16 Defendants

**CRIMINAL INDICTMENT**  
**Case No. 2:14-cr- 249**

Violations: 18 U.S.C. § 1084 - Transmission  
 of Wagering Information; 18 U.S.C. § 1955 –  
 Operating An Illegal Gambling Business; and  
 18 U.S.C. § 2 – Aiding and Abetting

17 **THE GRAND JURY CHARGES THAT:**

18  
 19 **COUNT ONE**

20 **Transmission of Wagering Information**

21 Beginning on a date unknown, but not later than on or about June 6, 2014, and  
 22 continuing through July 9, 2014, in the states and federal district of Nevada, and elsewhere,  
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 24

1 WEI SENG PHUA, DARREN WAI KIT PHUA,  
2 HERMAN CHUN SANG YEUNG, SENG CHEN YONG,  
3 WAI KIN YONG, HUI TANG,  
4 YAN ZHANG, and YUNG KEUNG FAN,

5 defendants herein, aiding and abetting each other and others known and unknown, being  
6 engaged in the business of betting and wagering, did knowingly use a wire communication  
7 facility for the transmission in interstate and foreign commerce of: bets and wagers; information  
8 assisting in the placing of bets and wagers; communications entitling the recipient to receive  
9 money and credit as a result of a bet and wager; and information assisting in the placing of bets  
10 and wagers on the World Cup Soccer Tournament, a sporting event and contest, all in violation  
11 of Title 18, United States Code, Section 1084(a) and Title 18, United States Code, Section 2.

12 **COUNT TWO**

13 **Operating an Illegal Gambling Business**

14 Beginning on a date unknown, but not later than on or about June 6, 2014, and  
15 continuing through July 13, 2014, in the states and federal district of Nevada, and elsewhere,

16 WEI SENG PHUA, DARREN WAI KIT PHUA,  
17 HERMAN CHUN SANG YEUNG, SENG CHEN YONG,  
18 WAI KIN YONG, HUI TANG,  
19 YAN ZHANG, and YUNG KEUNG FAN,

20 defendants herein, aiding and abetting each other and others known and unknown, did conduct,  
21 finance, manage, supervise, direct and own all or part of an illegal gambling business, to wit: a  
22 gambling business involving sports betting, which gambling business was in violation of the  
23 laws of the State of Nevada, that is, NRS 463.010, NRS 463.160, NRS 465.092, and NRS  
24 465.093, and which involved five or more persons who conducted, financed, managed,  
supervised, directed and owed all or part of said illegal gambling business, and which remained  
in continuous operation for a period in excess of thirty days, and had a gross revenue of two

1 thousand dollars (\$2,000.00) in any single day, all in violation of Title 18, United States Code,  
2 Section 1955 and Title 18, United States Code, Section 2.

3 **FORFEITURE ALLEGATION ONE**  
4 **Transmission of Wagering Information and Operating an Illegal Gambling Business**

5 1. The allegations contained in Counts One and Two of this Criminal Indictment are  
6 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture  
7 pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code,  
8 Section 2461(c).

9 2. Upon conviction of any of the felony offenses charged in Counts One and Two of this  
10 Criminal Indictment,

11 WEI SENG PHUA, DARREN WAI KIT PHUA,  
12 HERMAN CHUN SANG YEUNG, SENG CHEN YONG,  
13 WAI KIN YONG, HUI TANG,  
14 YAN ZHANG, and YUNG KEUNG FAN,

15 defendants herein, shall forfeit to the United States of America, any property, real or personal,  
16 which constitutes or is derived from proceeds traceable to violations of Title 18, United States  
17 Code, Sections 1084(a) and 1955, specified unlawful activities as defined in Title 18, United  
18 States Code, Sections 1956(c)(7)(A), 1961(1)(A), and 1961(1)(B), or a conspiracy to commit  
19 such offenses, including an *in personam* criminal forfeiture money judgment.

20 3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
21 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission  
22 of the defendants –

- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

1 d. has been substantially diminished in value; or

2 e. has been commingled with other property that cannot be divided without  
3 difficulty;

4 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
5 853(p), to seek forfeiture of any properties of the defendants for the *in personam* criminal  
6 forfeiture money judgment.

7 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United  
8 States Code, Section 2461(c); Title 18, United States Code, Section 1084 and 1955; and Title 21,  
9 United States Code, Section 853(p).

10 **FORFEITURE ALLEGATION TWO**  
11 **Operating an Illegal Gambling Business**

12 1. The allegations contained in Count Two of this Criminal Indictment are hereby  
13 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to  
14 Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461(c).

15 2. Upon conviction of the felony offense charged in Count Two of this Criminal  
16 Indictment, the defendants,

17 WEI SENG PHUA, DARREN WAI KIT PHUA,  
18 HERMAN CHUN SANG YEUNG, SENG CHEN YONG,  
19 WAI KIN YONG, HUI TANG,  
YAN ZHANG, and YUNG KEUNG FAN,

20 defendants herein, shall forfeit to the United States of America, any property, including money,  
21 used in violation of Nevada Revised Statutes 463.010, 463.160, 465.092 and 465.093 and Title  
22 18, United States Code, Section 1955, including an *in personam* criminal forfeiture money  
23 judgment.

1 3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
2 1955(d) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
3 the defendant-

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

10 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
11 853(p), to seek forfeiture of any properties of the defendant for the *in personam* criminal  
12 forfeiture money judgment.

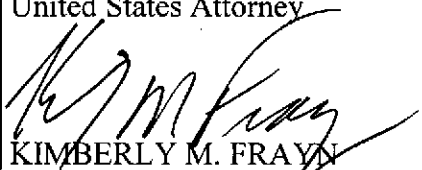
13 All in violation of Nevada Revised Statutes Nevada Revised Statutes 463.010, 463.160,  
14 465.092 and 465.093 and Title 18, United States Code, Section 1955 and Title 18, United States  
15 Code, Section 1955(d) and Title 28, United States Code, Section 2461(c).

16 **DATED:** this 29<sup>th</sup> day of July, 2014

17 **A TRUE BILL:**

18  
19 /S/  
FOREPERSON OF THE GRAND JURY

20 DANIEL G. BOGDEN  
United States Attorney

21  
22   
23 KIMBERLY M. FRAYN  
Assistant United States Attorney