

CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT	CENTRAL DISTRICT OF CALIFORNIA
UNITED STATES OF AMERICA v. JIMMY KHA, aka Vinh Kha, FELIX KHA, and MAI NGUYEN, and WADE STEFFEN	DOCKET NO. 12-401M MAGISTRATE'S CASE NO. W: 12-47M

Class A
Misd
1 yr \$100,000 fine
25 sa
4 yr TSE

Complaint for a violation of Title 16, United States Code, Sections 3372(a)(1), 3373(d)(1)(B), 1538(a)(1)(E), 1538(a)(1)(F), 1540(b) (knowing transportation, sale, receipt, acquisition, or purchase of endangered species with a market value in excess of \$350 with knowledge that the endangered species were delivered, sold, carried, transported, or shipped in the course of commercial activity and/or were sold or offered for sale in interstate commerce) [COUNTS 2-4]; and Title 18, United States Code, Section 371 (conspiracy to engage in violations of the aforementioned statutes) [COUNT 1]

5yr \$100
250,000 3yr TSE

NAME OF MAGISTRATE JUDGE JAY C. GANDHI	UNITED STATES MAGISTRATE JUDGE	LOCATION Los Angeles, CA
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DATE OF OFFENSE 8/11 - 2/12	PLACE OF OFFENSE Los Angeles/Orange and San Bernardino Counties	ADDRESS OF ACCUSED (IF KNOWN)
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COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:
SEE AFFIDAVIT AND COUNTS LABELED AS ATTACHMENT A

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:
See attached affidavit which is incorporated herein as part of this complaint.

MATERIAL WITNESSES IN RELATION TO THIS CHARGE:

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT LIZZ DARLING
	OFFICIAL TITLE SPECIAL AGENT - U.S. FISH & WILDLIFE SERVICE

Sworn to before me and subscribed in my presence,

SIGNATURE OF MAGISTRATE JUDGE (1) Jay C. Gandhi	DATE February 16, 2012
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1.) See Federal Rules of Criminal Procedure rules 3 and 54.
[AUSA D. MITCHELL] REC: (1) DETENTION FOR JIMMY KHA, FELIX KHA, and MAI NGUYEN
(2) \$100,000 Bond Secured by AOS by Third Party for WADE STEFFEN

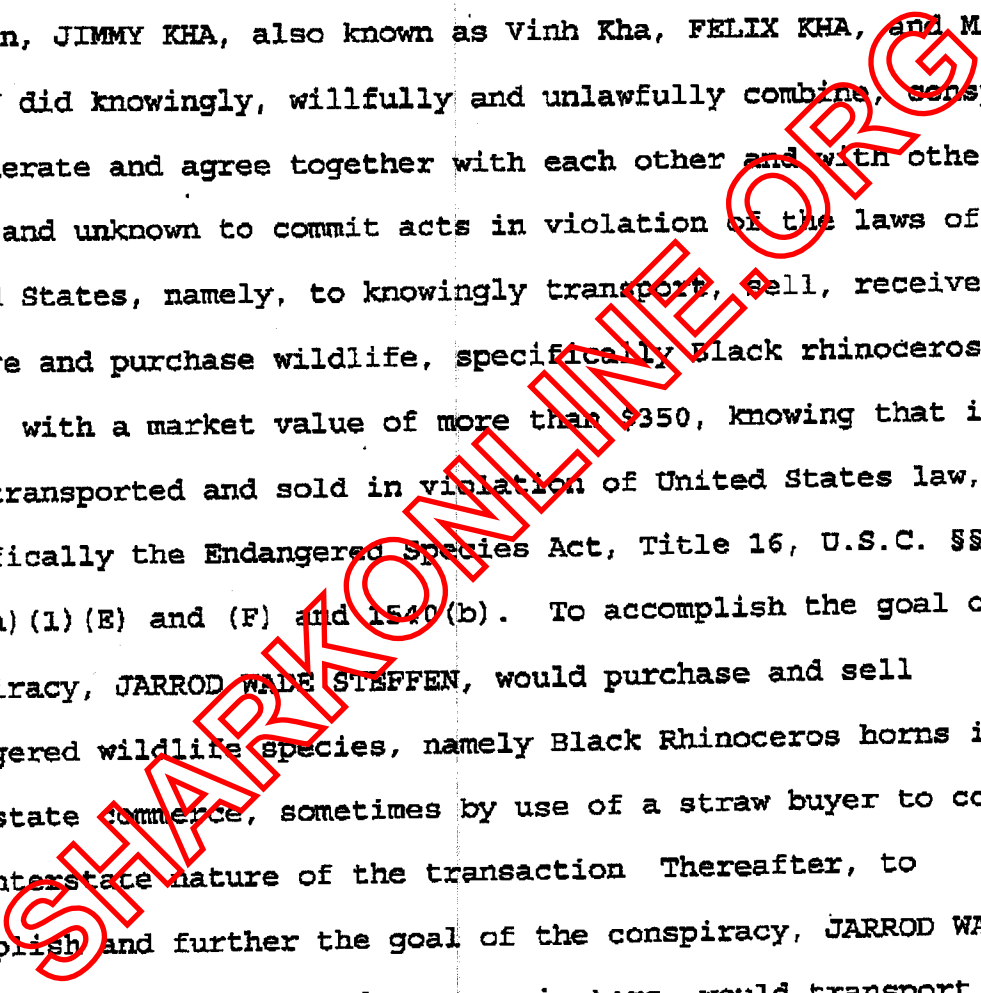
ATTACHMENT "A"

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COUNT ONE

[18 U.S.C. § 371; 16 U.S.C. §§ 1538(a)(1)(E) and (F), 1540(b), 3372(a)(1), 3373(d)(1)(B)]

Between on or about August 2011, and February 2012, in Orange County, within the Central District of California, and elsewhere, defendants JARROD WADE STEFFEN, also known as Wade Steffen, JIMMY KHA, also known as Vinh Kha, FELIX KHA, and MAI NGUYEN did knowingly, willfully and unlawfully combine, conspire, confederate and agree together with each other and with others known and unknown to commit acts in violation of the laws of the United States, namely, to knowingly transport, sell, receive, acquire and purchase wildlife, specifically Black rhinoceros horns, with a market value of more than \$350, knowing that it had been transported and sold in violation of United States law, specifically the Endangered Species Act, Title 16, U.S.C. §§ 1538(a)(1)(E) and (F) and 1540(b). To accomplish the goal of the conspiracy, JARROD WADE STEFFEN, would purchase and sell endangered wildlife species, namely Black Rhinoceros horns in interstate commerce, sometimes by use of a straw buyer to conceal the interstate nature of the transaction. Thereafter, to accomplish and further the goal of the conspiracy, JARROD WADE STEFFEN, and other unnamed co-conspirators, would transport or arrange for the interstate transportation of the wildlife to JIMMY KHA and FELIX KHA, sometimes via MAI NGUYEN. JIMMY KHA and FELIX KHA would purchase the wildlife from JARROD WADE STEFFEN



COUNT TWO

[16 U.S.C. §§ 3372(a)(1), 3373(d)(1)(B); 18 U.S.C. § 2]

On or about October 26, 2011, in Orange County, within the Central District of California, and elsewhere, defendant JARROD WADE STEFFEN, also known as Wade Steffen, did knowingly transport and sell wildlife, namely Black Rhinoceros horns with a market value in excess of \$350, knowing that the horns had been first sold to him in interstate commerce by use of an unnamed straw buyer on or about October 14 and 15, 2011, in violation of federal law, namely, the Endangered Species Act, Title 16 United States Code, Sections 1538(a)(1)(F), 1540(k)(2), which prohibit the offering for sale and sale of endangered species of wildlife, including Black Rhinoceros, in interstate commerce. Specifically, defendant JARROD WADE STEFFEN traveled in interstate commerce from Illinois to Forth Worth, Texas, purchased the Black Rhinoceros horns on or about October 14 and 15, 2011, through an unnamed straw buyer he used for the purpose of concealing the fact that he was not a resident of the State of Texas, and thereafter transported and on approximately October 26, 2011, re-sold the illegally sold wildlife.

COUNT THREE

[16 U.S.C. §§ 3372(a)(1), 3373(d)(1)(B); 18 U.S.C. §§ 2]

On or about November 1, 2011, in Orange County, within the Central District of California, and elsewhere, defendant JARROD WADE STEFFEN, also known as Wade Steffen, did knowingly transport and sell wildlife, namely Black Rhinoceros horns with a market value in excess of \$350, knowing that the horns had been sold to him in violation of federal law, namely, the Endangered Species Act, Title 16 United States Code, Sections 1538(a)(1)(F), 1540(b)(1), which prohibit the offering for sale and sale of endangered species, including Black Rhinoceros, in interstate commerce. Specifically, defendant JARROD WADE STEFFEN traveled in interstate commerce from Illinois to Forth Worth, Texas, purchased the Black Rhinoceros horns on or about October 14 and 15, 2011, through an unnamed straw buyer he used for the purpose of concealing the fact that he was not a resident of the State of Texas, and thereafter transported and on approximately November 1, 2011, re-sold the illegally sold wildlife.

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COUNT FOUR

[16 U.S.C. §§ 3372(a)(1), 3373(d)(1)(B); 18 U.S.C. §§ 2]

Between on or about October 26, 2011, and on or about November 1, 2011, in Orange County, within the Central District of California, and elsewhere, defendants JIMMY KHA, also known as Vinh Kha, FELIX KHA, and MAI NGUYEN, did knowingly acquire and transport wildlife, namely Black Rhinoceros horns with a market value in excess of \$350, knowing that the wildlife had been sold and transported in violation of federal law, namely, the Endangered Species Act, Title 16 United States Code Sections 1538(a)(1)(E) and (F), 1540(b)(1), which prohibit, in interstate commerce, the delivery, receipt, carriage, transport, and shipment in the course of commercial activity, and the offering for sale and sale of endangered species, including Black Rhinoceros. Specifically, between on or about October 26, 2011, and on or about November 1, 2011, defendants JIMMY KHA, FELIX KHA, and MAI NGUYEN were sold and had transported, shipped, carried and delivered to MAI NGUYEN in California, from Texas, Black Rhinoceros horns for which he paid more than \$350. Thereafter, knowing that the Black Rhinoceros horns had been illegally sold, transported, shipped, carried and delivered in interstate commerce, between on or about October 26, 2011, and on or about November 1, 2011, defendant MAI NGUYEN transported the horns to the residence of defendants JIMMY and FELIX KHA. Thereafter, defendants JIMMY and FELIX KHA transported, and

caused to be transported, the horns from their residence to their business at Win Lee Porcelain.

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