

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DEPUTY CLERK

NT

UNITED STATES OF AMERICA

V.

ALBERT SHIH-DER CHANG (1)

NO.

3-16CR0329-L

INDICTMENT

The Grand Jury Charges:

INTRODUCTION

1. One Technologies is a technology company located at 8144 Walnut Hill Lane in Dallas, Texas, in the Northern District of Texas.
2. One Technologies maintained a Wells Fargo Bank business checking account, last four digits 6362. The local branch used by One Technologies was located in the Dallas Division of the Northern District of Texas.
3. Wells Fargo Bank is a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.
4. One Technologies maintained an American Express Card business account (AmEx account), which included cards, last four digits 2041 and 1011.
5. From on or about October 4, 2004, through on or about August 15, 2014, Albert Shih-Der Chang worked for One Technologies, initially as its Network/Systems Administrator and later as its Lead Systems Engineer.

6. On or about November 4, 2007, Albert Shih-Der Chang opened PayPal account, last four digits 3460. Between July 31, 2008, and May 1, 2014, One Technologies' AmEx account transferred \$1,389,631.42 to Chang's PayPal account #3460. One Technologies made monthly payments on the AmEx account from its Wells Fargo Bank, last four digits 6362.

7. On or about February 19, 2009, Albert Chang and DL, a name known to the Grand Jury, contracted with Earth Class Mail located at 14525 SW Millikan Way, Beaverton, Oregon, to obtain a virtual address and mail-forwarding services in the name of A1 Discount Printer Supplies. Earth Class Mail closed the account on May 19, 2009.

8. On or about August 8, 2009, Chang sold a residence located at 123 Sherwood Dr., Murphy, Texas. On or about August 7, 2009, Albert S. Chang purchased a 3,418 square foot single family residence located at 3001 Provine Rd., McKinney, Texas. Chang sold the Provine residence on or about May 20, 2014.

9. On or about October 26, 2012, Albert Shih-Der Chang presented his Texas Driver License and his One Technologies Cigna health insurance card, and rented mailbox #147 at The UPS Store at 4100 W. Eldorado Pkwy, Suite 100, McKinney, Texas. Chang did not include a company name on the application but referenced his type of business as IT Consulting. Chang provided albsc81-pmb@yahoo.com as his contact e-mail account.

10. PC-Direct LLC was a Texas limited liability corporation created on or about November 1, 2012, with a business address on W. Eldorado Pkwy, McKinney, Texas 75070. Albert Chang was its managing member and registered agent. On April 15, 2014, Chang changed the registered agent to SK, an individual known to the Grand Jury.

11. IT Connection LLC was a Texas limited liability corporation created on or about November 6, 2012, with a business address of 7909 Greenhollow, Dallas, Texas 75240.

Albert Chang was its managing member and registered agent.

12. On or about April 16, 2013, Albert Shih-Der Chang presented his Texas Driver License and his One Technologies Cigna health insurance card, and rented mailbox #185 at The UPS Store at 11700 Preston Road, Suite 660, Dallas, Texas. On the application, Chang provided a corporate name of PC Direct at Chang's Provine address, and described the business as IT Consulting.

13. On or about May 31, 2013, Albert Chang and JGWC, an individual known to the Grand Jury, purchased a 5,721 square foot single family residence located 100 Stone Hinge Drive, Fairview, Texas.

14. 7909 Greenhollow Lane, Dallas, Texas, was a residence occupied by SK, and was purchased by SK in late 2007.

COUNTS ONE THROUGH TEN

Mail Fraud
(18 U.S.C. § 1341)

1. The allegations contained in the Introduction to this Indictment are hereby realleged and incorporated by reference.
2. From in or about July 2008, and continuing through in or about August 2014, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant Albert Shih-Der Chang, knowingly and with the intent to defraud, devised a scheme and artifice to defraud and to obtain money and property by means of property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

3. The purpose of the scheme and artifice to defraud was to cause One Technologies (a) to transfer funds based on material misrepresentations to financial accounts controlled by defendant Albert Shih-Der Chang, or (b) to purchase products purportedly for One Technologies' use, that Chang thereafter would convert to his own use.
4. It was part of the scheme and artifice to defraud that defendant Albert Shih-Der Chang made material misrepresentations to One Technologies, leading One Technologies to believe that (a) the transferred funds constituted payments to legitimate suppliers for products provided to One Technologies, or (b) that the products purchased were for the benefit and use of One Technologies.
5. To facilitate the scheme and artifice to defraud, defendant Albert Shih-Der Chang, aided and abetted by others known and unknown to the Grand Jury, did
 - a. Create fictitious companies;

- b. Open or use bank accounts or PayPal accounts for the fictitious companies;
 - c. Rent mailboxes for the fictitious companies at UPS Stores;
 - d. Contract for virtual offices with mail forwarding services for the fictitious companies;
 - e. Create fictitious purchase requisitions orders, invoices, and receipts;
 - f. Submit the fictitious purchase requisitions orders, invoices, and receipts to One Technologies by U.S. mail, hand delivery, or by e-mail;
 - g. Cause One Technologies to issue company checks from its Wells Fargo Bank account #6362 payable to the fictitious companies;
 - h. Cause One Technologies to pay the invoices from its company AmEx account;
 - i. Cause One Technologies to transfer funds through the ACH¹ Network from its Wells Fargo Bank account #6362 to its AmEx account;
6. Between in or about July 2008, and continuing to in or about August 2014, One Technologies paid in excess of \$2,400,000.00 as a result of the false and fraudulent pretenses, representations, and promises made by Albert Shih-Der Chang.
7. On or about the following dates in the Dallas Division of the Northern District of Texas and elsewhere, the defendant Albert Shih-Der Chang, for the purpose of carrying on the aforesaid scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, did knowingly cause One Technologies from its offices at 8144 Walnut Hill Lane,

¹ ACH stands for Automated Clearing House. The ACH Network facilitates the electronic transfer of funds from one financial institution to another.

Dallas, Texas, to place and cause to be placed in any post office and authorized depository for mail matter, the following checks drawn on One Technologies' Wells Fargo Bank account #6362, to be sent and delivered by the United States Postal Service to PC Direct LLC, at 11700 Preston Road, Ste 660-185, Dallas, Texas, as payment on fraudulent invoices submitted by Albert Shih-Der Chang, doing business as PC Direct LLC, and said conduct affected a financial institution, namely Wells Fargo Bank, N.A.:

Count	PC Direct LLC Invoice			One Technologies Wells Fargo Bank Account #6362		
	Invoice Date(s)	Invoice Number(s)	Invoice Amount(s)	Check Date	Check Number	Check Amount
1	04/16/2013	#4866	\$40,413.38	04/18/2013	#9667	\$40,413.38
2	04/17/2013	#4872	\$52,829.82	04/24/2013	#9797	\$52,829.82
3	04/17/2013	#4786 #4874 #4881	\$21,704.45 \$57,297.52 \$14,788.24	05/08/2013	#9859	\$93,790.21
4	05/13/2013	#5120	\$38,262.69	05/16/2013	#9915	\$38,262.69
5	05/01/2013	#4867 #4994 #5002	\$40,413.38 \$15,064.07 \$52,743.22	05/23/2013	#10017	\$108,220.67
6	06/06/2013	#5931	\$14,746.50	07/03/2013	#10366	\$14,746.50
7	04/22/2014	#106502	\$ 8,992.93	05/15/2014	#12709	\$ 8,992.93

8	04/30/2014	#106590 #106588	\$ 1,217.68 \$ 1,890.05	05/22/2014	#12797	\$ 3,107.73
9	05/02/2014 05/05/2014 05/12/2014	#106643 #106613 #106673	\$ 5,100.55 \$ 603.21 \$ 6,702.65	05/29/2014	#12844	\$12,406.41
10	05/19/2014	#106688	\$ 4,813.50	06/12/2014	#12914	\$ 4,813.50

In violation of 18 U.S.C. § 1341.

COUNT ELEVEN
Money Laundering
(18 U.S.C. § 1957)

1. The allegations contained in the Introduction to this Indictment and in Counts One Through Five are hereby realleged and incorporated by reference.

2. From at least on or about April 15, 2013, until on or about May 30, 2013, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant Albert Shih-Der Chang did knowingly engage and attempt to engage in a financial transaction in and affecting interstate commerce in criminally derived property of a value greater than \$10,000.00, to wit, on May 30, 2013, Chang wire transferred \$296,335.97 from Chang and JGWC's Chase Bank Account, last four digits 6335, to Allegiance Title Company's Grand Bank account located in the Northern District of Texas, to purchase the single family residence located at 100 Stone Hinge Drive, Fairview, Texas, and said wire transfer involved the proceeds of a specified unlawful activity, that being mail fraud in violation of 18 U.S.C. § 1341, specifically Chang engaged in multiple acts leading up to the financial transaction, that being (a) between April 15, 2013 and May 23, 2013, Chang caused One Technologies to rely on material misrepresentations to issue the checks identified in Counts One through Five made payable to PC Direct, which Chang thereafter deposited into PC Direct's Chase Bank account #8390, and (b) between May 29, 2013, Chang transferred \$215,000 from PC Direct's Chase Bank account #8390 to Chang and JGWC's Chase Bank account #6335.

In violation of 18 U.S.C. § 1957.

FORFEITURE NOTICE

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

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. 2461(c), upon conviction of 18 U.S.C. § 1341 in Counts One through Ten, the defendant, Albert Shih-Der Chang, shall forfeit to the United States, any property, real or personal, which constitutes or is derived from proceeds traceable to such violations. The property to be forfeited includes, but is not limited to, the following:

- a. 100 Stone Hinge Drive, Fairview, Texas.


Pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), if any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or 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,

the United States intends to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

A TRUE BILL:


FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



CANDINA S. HEATH
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Northern District of Texas
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INDICTMENT

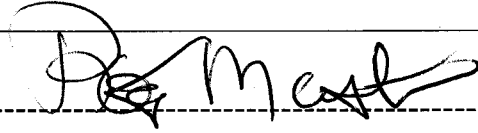
18 USC § 1341
Mail Fraud

18 USC §§ 1957
Money Laundering

18 USC §§ 981(a)(1)(C) and 28 U.S.C. 2461(c)
Forfeiture Notice

11 Counts

A true bill rendered



DALLAS

FOREPERSON

Filed in open court this 20th day of July, 2016.

Warrant to be Issued



UNITED STATES DISTRICT JUDGE
No Criminal Matter Pending