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Judge Zilly

03-CR-00187-INFO

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JUN 21 2004 MR
AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

NO. CR03-00187Z

INFORMATION

v.

(Felony)

LAURYN GALINDO,
Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Conspiracy to Commit Visa Fraud)

1. Beginning in about January 1997, and continuing through about December 2001, at Seattle, within the Western District of Washington and elsewhere, LAURYN GALINDO, and others known and unknown, knowingly conspired to possess, obtain, and receive immigrant visas, knowing that such visas were procured by means of a false claim and statement, and otherwise procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

1 false identities for adopted Cambodian children, in order to obtain Immediate
2 Relative Visas for the Cambodian children to enter the United States.

3 OVERT ACTS

4 7. During and in furtherance of the conspiracy, within the Western
5 District of Washington and elsewhere, one or more of the conspirators committed
6 one or more of the following overt acts, among others:

7 ***Immediate Relative Visa for DAR***

8 (1) In about November 1997, co-conspirator Lynn Devin told
9 Adoptive Parent #1 that an abandoned five-month-old boy, referred to hereinafter
10 as "DAR" (the first three letters of the boy's Cambodian name), was currently
11 available at a Cambodian orphanage.

12 (2) On or about November 10, 1997, co-conspirator Lynn Devin
13 caused Adoptive Parent #1 to wire transfer \$4,500 to Defendant LAURYN
14 GALINDO in Phnom Penh, Cambodia.

15 (3) On or about December 29, 1997, a co-conspirator delivered
16 DAR to Adoptive Parent #1 at the WOVA Sihanoukville Orphanage.

17 (4) On or about December 31, 1997, in Phnom Penh, after
18 Adoptive Parent #1 told Defendant LAURYN GALINDO that Adoptive Parent #1
19 no longer wanted to adopt DAR, Defendant LAURYN GALINDO encouraged
20 Adoptive Parent #1 to make a false representation on State Department Form
21 230 and INS Form I-600, to wit, that Adoptive Parent #1 intended for DAR to join
22 Adoptive Parent #1 in the United States as an immediate relative.

23 (5) On or about December 31, 1997, Defendant LAURYN
24 GALINDO and co-conspirators caused the State Department to issue an
25 Immediate Relative Visa to DAR, based upon false information contained in State
26 Department Form 230 and INS Form I-600.

27 (6) On or about December 31, 1997, Defendant LAURYN
28 GALINDO told co-conspirator Lynn Devin that DAR would reside in Cambodia

1 until a new client was located in the United States to adopt DAR.

2 (7) On or about December 31, 1997, co-conspirator Lynn Devin
3 told Adoptive Parent #2 that Adoptive Parent #1 had given DAR to Defendant
4 LAURYN GALINDO in Cambodia, and that DAR was currently available to
5 immigrate to the United States.

6 (8) On or about January 6, 1998, co-conspirator Lynn Devin
7 caused Adoptive Parent #2 to wire transfer \$8,500 to Defendant LAURYN
8 GALINDO in Phnom Penh, Cambodia.

9 (9) On or about January 6, 1998, co-conspirator Lynn Devin
10 caused Adoptive Parent #2 to pay an agency fee of \$1,250 in relation to the
11 adoption of DAR.

12 (10) On or about January 10, 1998, Defendant LAURYN GALINDO
13 entered the United States at the Honolulu International Airport with DAR.

14 (11) On or about January 10, 1998, Defendant LAURYN GALINDO
15 gave DAR to Adoptive Parent #2 at the Honolulu International Airport.

16 ***Immediate Relative Visa for SOD***

17 (12) On or about February 5, 1998, co-conspirator Lynn Devin told
18 Adoptive Parent #3 that a two-year-old girl ("SOD") was currently available for
19 adoption at a Cambodian orphanage.

20 (13) On or about February 5, 1998, co-conspirator Lynn Devin
21 caused Adoptive Parent #3 to wire transfer \$4,500 to Defendant LAURYN
22 GALINDO in relation to the adoption of SOD.

23 (14) On or about February 5, 1998, co-conspirator Lynn Devin
24 caused Adoptive Parent #3 to pay an agency fee of \$1,500 in relation to the
25 adoption of SOD.

26 (15) On or about May 8, 1998, Defendant LAURYN GALINDO
27 arranged for SOD to be delivered to Adoptive Parent #3 at the WOVA Cham
28 Chao Orphanage.

1 (16) On or about May 8, 1998, Defendant LAURYN GALINDO
2 caused Adoptive Parent #3 to pay a fee of \$3,500 in relation to the adoption of
3 SOD.

4 (17) On or about May 8, 1998, Defendant LAURYN GALINDO
5 gave Adoptive Parent #3 adoption documents falsely stating that SOD had been
6 an orphan living at the Kean Kliang Orphanage, which Adoptive Parent #3
7 presented to the State Department as supporting documentation to obtain an
8 Immediate Relative Visa for SOD.

9 (18) On or about May 8, 1998, Defendant LAURYN GALINDO
10 completed a portion of State Department Form 230 and INS Form I-600 for
11 Adoptive Parent #3, stating that SOD had no parents and that SOD was residing
12 at Kean Kliang Orphanage.

13 (19) On or about May 10, 1998, a co-conspirator informed
14 Adoptive Parent #3 that SOD's birth mother, father, and older sibling were alive.

15 (20) On or about May 11, 1998, Defendant LAURYN GALINDO
16 and co-conspirators caused the State Department to issue an Immediate Relative
17 Visa to SOD, based upon the false information contained in State Department
18 Form 230 and INS Form I-600.

19 ***Immediate Relative Visa for KAT***

20 (21) In about January 1998, a co-conspirator encouraged a birth
21 mother to give up her Cambodian four-year old daughter ("KAT") for adoption
22 instead of her older son.

23 (22) In about January 1998, co-conspirator Lynn Devin told
24 Adoptive Parent #4 that KAT was an abandoned four-year-old girl who was
25 currently available for adoption at a Cambodian orphanage.

26 (23) On or about January 6, 1998, Defendant LAURYN GALINDO
27 sent, or caused to be sent, by facsimile to co-conspirator Lynn Deviri, the medical
28 records for KAT, which contained the handwritten notation: "Father dead --

1 mother very poor -- Kampong Speu."

2 (24) On or about January 30, 1998, co-conspirator Lynn Devin
3 caused Adoptive Parent #4 to wire transfer \$4,500.00 to Defendant LAURYN
4 GALINDO in Phnom Penh, Cambodia, in relation to the adoption of KAT.

5 (25) On or about February 11, 1998, co-conspirator Lynn Devin
6 caused Adoptive Parent #4 to pay an application fee of \$2,500 in relation to the
7 adoption of KAT.

8 (26) On or about February 26, 1998, co-conspirator Lynn Devin,
9 sent, or caused to be sent, to Adoptive Parent #4, by facsimile, the medical
10 records for KAT.

11 (27) On or about May 10, 1998, Defendant LAURYN GALINDO
12 and a co-conspirator brought Adoptive Parent #4 to the Kompong Speu
13 Orphanage where KAT was delivered to Adoptive Parent #4 by KAT's biological
14 mother.

15 (28) On or about May 10, 1998, in Cambodia, Defendant
16 LAURYN GALINDO required Adoptive Parent #4 to pay her \$3,500.00 in United
17 States currency purportedly as an orphanage donation.

18 (29) On or about May 10, 1998, co-conspirator Lynn Devin spoke
19 with Adoptive Parent #4 in Cambodia, from Seattle by telephone, during which
20 call co-conspirator Lynn Devin acknowledged that Defendant LAURYN GALINDO
21 had called her and told her about Adoptive Parent #4 having met KAT's birth
22 mother in Cambodia, and during which co-conspirator Lynn Devin told Adoptive
23 Parent #4 that it would be best for KAT to go ahead with the adoption and bring
24 KAT to the United States.

25 (30) On or about May 11, 1998, Defendant LAURYN GALINDO
26 completed a portion of INS Form I-600 for Adoptive Parent #4, falsely
27 representing that KAT had no parents, and completed a portion of State
28 Department Form 230 for Adoptive Parent #3, falsely representing that the

1 parents and relatives of KAT were unknown.

2 (31) On or about May 12, 1998, Defendant LAURYN GALINDO,
3 and other members of the conspiracy, caused the State Department to issue an
4 Immediate Relative Visa to KAT, based upon the false information contained in
5 State Department Form 230 and INS Form I-600.

6 ***Immediate Relative Visa for RET***

7 (32) On or about May 12, 1998, members of the conspiracy met
8 with the birth mother of a four-year-old child ("RET") to discuss the terms of the
9 birth mother giving RET up for adoption, including the payment of money to the
10 birth mother for RET.

11 (33) On or about July 1, 1998, Defendant LAURYN GALINDO
12 completed an Affidavit Concerning Exemption From Immigrant Vaccination
13 Requirements For A Foreign Adopted Child (Affidavit), on which the Defendant
14 certified that she would file INS Form I-600 according RET status as an orphan
15 as defined in the Affidavit.

16 (34) On or about July 4, 1998, a co-conspirator accompanied
17 Adoptive Parent #5 to the Kompong Speu Orphanage where they met RET,
18 RET's birth mother, and another coconspirator.

19 (35) On or about July 4, 1998, a co-conspirator informed
20 Defendant LAURYN GALINDO that RET's birth mother met Adoptive Parent #5 at
21 the Kompong Speu Orphanage that day.

22 (36) On or about July 6, 1998, Defendant LAURYN GALINDO
23 caused Adoptive Parent #5 to pay \$4,100 in relation to the adoption of RET.

24 (37) On or about July 7, 1998, Defendant LAURYN GALINDO, and
25 other co-conspirators, caused the State Department to issue an Immediate
26 Relative Visa to RET, based upon the false information contained in State
27 Department Form 230 and INS Form I-600, that RET had no known relatives.

28 ***Immediate Relative Visa for UNK***

1 (38) On or about October 7, 1998, co-conspirator Lynn Devin told
2 Adoptive Parent #6 that a two-month-old boy ("SEI") was currently available for
3 adoption at a Cambodian orphanage

4 (39) On or about October 7, 1998, defendant co-conspirator Lynn
5 Devin caused Adoptive Parent #6 to wire transfer \$5,500 to Defendant LAURYN
6 GALINDO in relation to the adoption of SEI.

7 (40) On or about October 7, 1998, co-conspirator Lynn
8 Devin caused Adoptive Parent #6 to pay an agency fee of \$2,500 in relation to
9 the adoption of SEI.

10 (41) In about the first week of November 1998, co-conspirator Lynn
11 Devin attempted to inform Adoptive Parent #6 that SEI had recently died in
12 Cambodia.

13 (42) On or about November 6, 1998, a co-conspirator
14 delivered an unknown child ("UNK") to Adoptive Parent #6 in Cambodia.

15 (43) On or about November 6, 1998, Defendant LAURYN
16 GALINDO caused Adoptive Parent #6 to pay to pay a fee of \$3,500 in relation to
17 the adoption of UNK.

18 (44) On or about November 6, 1998, Defendant LAURYN
19 GALINDO completed a portion of State Department Form 230 and INS Form I-
20 600 for Adoptive Parent #6, using the biographical data of SEI for a different
21 infant.

22 (45) On or about November 10, 1998, Defendant LAURYN
23 GALINDO and other co-conspirators caused the State Department to issue an
24 Immediate Relative Visa to UNK, based upon the false information contained in
25 State Department Form 230 and INS Form I-600.

26 ***Immediate Relative Visa for SOP***

27 (46) On or about October 1, 1998, co-conspirator Lynn
28 Devin told Adoptive Parent #7 that an abandoned infant boy ("SOK") was

1 currently available for adoption at a Cambodian orphanage.

2 (47) On or about October 1, 1998, co-conspirator Lynn Devin
3 caused Adoptive Parent #7 to pay an agency fee of \$1,500 in relation to the
4 adoption of SOK.

5 (48) On or about October 1, 1998, co-conspirator Lynn Devin
6 caused Adoptive Parent #7 to wire transfer \$5,500 to Defendant LAURYN
7 GALINDO in relation to the adoption of SOK.

8 (49) In about November 1998, Defendant LAURYN
9 GALINDO delivered SOK to Adoptive Parent #7 at the Kompong Speu
10 Orphanage.

11 (50) In about November 1998, Defendant LAURYN
12 GALINDO informed Adoptive Parent #7 that she would be willing to replace SOK,
13 who Adoptive Parent #7 believed was ill, with a one-year-old boy ("SOP").

14 (51) In about November 1998, a co-conspirator delivered SOP to
15 Adoptive Parent #7 in Phnom Penh, Cambodia.

16 (52) On or about November 10, 1998, Defendant LAURYN
17 GALINDO completed a portion of State Department Form 230 and INS Form I-
18 600 for Adoptive Parent #7, using the biographical data of a different infant for
19 SOP.

20 (53) On or about November 13, 1998, Defendant LAURYN
21 GALINDO and co-conspirators caused the State Department to issue an
22 Immediate Relative Visa to SOP, based upon the false information contained in
23 State Department Form 230 and INS Form I-600.

24 ***Immediate Relative Visa for VOL***

25 (54) On or about October 26, 1998, co-conspirator Lynn Devin
26 told Adoptive Parent #8 that a two-month-old abandoned infant girl ("HEN") was
27 currently available for adoption at a Cambodian orphanage.

28 (55) On or about October 29, 1998, co-conspirator Lynn Devin

1 caused Adoptive Parent #8 to pay an agency fee of \$1,500 to SIA in relation to
2 the adoption of HEN.

3 (56) On or about October 29, 1998, co-conspirator Lynn Devin
4 caused Adoptive Parent #8 to wire transfer \$5,500 to a co-conspirator in relation
5 to the adoption of HEN.

6 (57) On or about November 17, 1998, co-conspirator Lynn Devin
7 caused Adoptive Parent #8 to wire transfer \$3,500 to a co-conspirator as a fee in
8 relation to the adoption of HEN.

9 (58) On or about December 2, 1998, Defendant LAURYN
10 GALINDO, knowing that HEN was ill, told Adoptive Parent #8 that she would
11 request a substitution of another baby girl ("VOL") for HEN.

12 (59) On or about December 3, 1998, Defendant LAURYN
13 GALINDO completed a portion of State Department Form 230 and INS Form I-
14 600 for Adoptive Parent #8, using the biographical data of HEN for VOL.

15 (60) On or about December 4, 1998, Defendant LAURYN
16 GALINDO and other co-conspirators caused the State Department to issue an
17 Immediate Relative Visa to VOL, based upon the false information contained in
18 State Department Form 230 and INS Form I-600.

19 ***Immediate Relative Visa for CHAN***

20 (61) On or about November 2, 1998, co-conspirator Lynn Devin
21 told Adoptive Parent #9 that an infant girl ("VOL") was currently available for
22 adoption at a Cambodian orphanage.

23 (62) On or about November 9, 1998, co-conspirator Lynn Devin
24 caused Adoptive Parent #9 to wire transfer \$5,500 to Defendant LAURYN
25 GALINDO in relation to the adoption of VOL.

26 (63) On or about November 13, 1998, co-conspirator Lynn Devin
27 caused Adoptive Parent #9 to pay an agency fee of \$1,500 in relation to the
28 adoption of VOL.

1 (64) On or about January 10, 1999, Defendant LAURYN
2 GALINDO, knowing that VOL had already been adopted by Adoptive Parent #8,
3 faxed co-conspirator Lynn Devin a medical report for a six-month-old female
4 ("CHAN").

5 (65) On or about January 20, 1999, Defendant LAURYN
6 GALINDO arranged to deliver CHAN to Adoptive Parent #9, and completed a
7 portion of State Department Form 230 and INS Form I-600 for Adoptive Parent
8 #9, using the biographical data of VOL for CHAN.

9 (66) On or about January 21, 1999, Defendant LAURYN GALINDO
10 and other co-conspirators caused the State Department to issue an Immediate
11 Relative Visa to CHAN, based upon the false information contained in State
12 Department Form 230 and INS Form I-600.

13 ***Immediate Relative Visa for NIR***

14 (67) On or about January 22, 1999, a co-conspirator sent a fax to
15 co-conspirator Lynn Devin from Cambodia informing her that a three-month-old
16 boy ("NIR"), living at the WOVA Cham Chao Orphanage, had been mistakenly
17 identified as a three-month old girl.

18 (68) On or about March 31, 1999, a co-conspirator delivered an
19 infant girl ("UNK2") to Adoptive Parent #10 at the WOVA Cham Chao Orphanage.

20 (69) On or about March 31, 1999, Defendant LAURYN
21 GALINDO, gave a co-conspirator adoption documents falsely stating that UNK2
22 (utilizing the female identity of NIR) had been an orphan living at the Kean Kiang
23 Orphanage.

24 (70) On or about April 1, 1999, Defendant LAURYN GALINDO and
25 co-conspirators caused the State Department to issue an Immediate Relative
26 Visa to UNK2, based upon the false information contained in State Department
27 Form 230 and INS Form I-600.

28 ***Immediate Relative Visa for THEA***

1 (71) On or about February 11, 1999, co-conspirator Lynn Devin
2 told Adoptive Parent #11 that a one-month-old abandoned infant girl ("VIM") was
3 currently available for adoption at a Cambodian orphanage.

4 (72) On or about March 5, 1999, co-conspirator Lynn Devin
5 caused Adoptive Parent #11 to wire transfer \$5,500 to a co-conspirator in relation
6 to the adoption of VIM.

7 (73) On or about March 25, 1999, co-conspirator Lynn Devin
8 caused Adoptive Parent #11 to pay an agency fee of \$2,500 in relation to the
9 adoption of VIM.

10 (74) On or about June 2, 1999, co-conspirator Lynn Devin had a
11 phone conversation with Adoptive Parent #11 concerning the feasibility of
12 completing an adoption of a four-month-old infant girl ("THEA") using VIM's
13 identity and Cambodian documents.

14 (75) On or about June 9, 1999, a co-conspirator delivered THEA to
15 Adoptive Parent #11 at an unknown Cambodian residence.

16 (76) On or about June 14, 1999, Defendant LAURYN GALINDO
17 caused Adoptive Parent #11 to pay \$3,500 in relation to the adoption of VIM.

18 (77) On or about June 14, 1999, Defendant LAURYN GALINDO
19 completed a portion of State Department Form 230 and INS Form I-600 for
20 Adoptive Parent #11, using the biographical data of VIM for THEA.

21 (78) On or about June 15, 1999, Defendant LAURYN GALINDO
22 and other co-conspirators caused the State Department to issue an Immediate
23 Relative Visa to THEA, based upon the false information contained in State
24 Department Form 230 and INS Form I-600.

25 ***Immediate Relative Visa for MIT***

26 (79) On or about February 10, 1999, Defendant LAURYN
27 GALINDO faxed a medical report for a two-month-old boy ("MIT") to co-
28 conspirator Lynn Devin indicating that MIT had a father, and that MIT currently

1 lived at the WOVA Cham Chao Orphanage.

2 (80) On or about February 12, 1999, co-conspirator Lynn Devin told
3 Adoptive Parent #12 that MIT was currently available for adoption at a
4 Cambodian orphanage.

5 (81) On or about February 12, 1999, co-conspirator Lynn Devin
6 caused Adoptive Parent #12 to wire transfer \$5,500 to Defendant LAURYN
7 GALINDO in relation to the adoption of MIT.

8 (82) On or about February 12, 1999, co-conspirator Lynn Devin
9 caused Adoptive Parent #12 to pay an agency fee of \$2,500 in relation to the
10 adoption of MIT.

11 (83) On or about February 12, 1999, co-conspirator Lynn Devin
12 informed Adoptive Parent #12 that Adoptive Parent #12 still owed a final cash
13 payment of \$3,500 to Defendant LAURYN GALINDO in relation to the adoption of
14 MIT.

15 (84) On or about June 16, 1999, a co-conspirator delivered MIT to
16 Adoptive Parent #12 in Cambodia.

17 (85) On or about June 16, 1999, Defendant LAURYN
18 GALINDO completed for Adoptive Parent #12 those portions of State Department
19 Form 230 and INS Form I-600 which state that the parents are unknown.

20 (86) On or about June 16, 1999, Defendant LAURYN GALINDO
21 and co-conspirators caused the State Department to issue an Immediate Relative
22 Visa to MIT, based upon the false information contained in State Department
23 Form 230 and INS Form I-600.

24 ***Immediate Relative Visa for DAL***

25 (87) On or about June 11, 1999, a co-conspirator conducted a
26 physical exam on a three-month-old baby girl ("KOL") in Cambodia.

27 (88) On or about June 14, 1999, co-conspirator Lynn Devin told
28 Adoptive Parent #13 that KOL was currently available for adoption at a

1 Cambodian orphanage.

2 (89) On or about June 14, 1999, co-conspirator Lynn Devin caused
3 Adoptive Parent #13 to pay an agency fee of \$2,500 in relation to the adoption of
4 KOL.

5 (90) On or about June 15, 1999, co-conspirator Lynn Devin caused
6 Adoptive Parent #13 to wire transfer \$5,500 to Defendant LAURYN GALINDO in
7 relation to the adoption of KOL.

8 (91) On or about June 15, 1999, co-conspirator Lynn Devin caused
9 Adoptive Parent #13 to sign a "Child Acceptance and Medical Release" for a child
10 named "KOL."

11 (92) On or about August 23, 1999, a co-conspirator conducted a
12 physical exam on a one-month-old baby girl ("DAL").

13 (93) On or about August 24, 1999, a co-conspirator instructed
14 Adoptive Parent #13 how to complete a portion of State Department Form 230
15 and INS Form I-600 for KOL.

16 (94) On or about August 24, 1999, a co-conspirator delivered KOL
17 to Adoptive Parent #13 at the WOVA Cham Chao Orphanage.

18 (95) On or about August 25, 1999, a co-conspirator informed
19 Adoptive Parent #13 that she would be willing to replace KOL with DAL on the
20 condition that DAL assumed the identity of KOL.

21 (96) On or about August 25, 1999, a co-conspirator delivered DAL
22 to Adoptive Parent #13 at the WOVA Cham Chao Orphanage.

23 (97) On or about August 27, 1999, co-conspirator Lynn Devin
24 witnessed a "Child Acceptance and Medical Release" form being signed by
25 Adoptive Parent #13 in Cambodia that contained the name "KOL a/k/a DAL."

26 (98) On or about August 30, 1999, Defendant LAURYN GALINDO
27 completed a portion of State Department Form 230 and INS Form I-600, using
28 the biographical data of KOL for DAL.

1 (99). On or about August 30, 1999, Defendant LAURYN GALINDO
2 and other co-conspirators caused the State Department to issue an Immediate
3 Relative Visa to DAL, based upon the false information contained in State
4 Department Form 230 and INS Form I-600.

5 (100) On or about August 31, 1999, Defendant LAURYN
6 GALINDO caused Adoptive Parent #13 to pay a fee of \$3,500 in relation to the
7 adoption of DAL.

8 ***Immediate Relative Visa for VEH***

9 (101) On or about June 11, 1999, a co-conspirator conducted a
10 physical exam on a six-day-old baby boy ("VIT").

11 (102) On or about June 14, 1999, co-conspirator Lynn Devin told
12 Adoptive Parent #14 that VIT was currently available for adoption at a Cambodian
13 orphanage

14 (103) On or about June 15, 1999, co-conspirator Lynn Devin caused
15 Adoptive Parent #14 to wire transfer \$5,500 to a co-conspirator in relation to the
16 adoption of VIT.

17 (104) On or about June 17, 1999, co-conspirator Lynn Devin caused
18 Adoptive Parent #14 to pay an agency fee of \$2,500 in relation to the adoption of
19 VIT.

20 (105) On or about the first week of July 1999, co-conspirator Lynn
21 Devin informed Adoptive Parent #14 that VIT had died while living at a private
22 residence in Cambodia.

23 (106) On or about July 6, 1999, a co-conspirator faxed co-
24 conspirator Lynn Devin a copy of test results for a ten-day-old baby boy ("VEH").

25 (107) On or about July 13, 1999, a co-conspirator faxed co-
26 conspirator Lynn Devin a copy of VEH's medical exam that the co-conspirator
27 had performed on July 12, 1999.

28 (108) During July 1999, co-conspirator Lynn Devin had several

1 | phone conversations with Adoptive Parent #14 concerning the feasibility of
2 | completing an adoption of VEH using VIT's identity and Cambodian documents.

3 | (109) On or about October 18, 1999, a co-conspirator delivered VEH
4 | to Adoptive Parent #14 at the WOVA Cham Chao Orphanage.

5 | (110) On or about October 19, 1999, Defendant LAURYN
6 | GALINDO completed a portion of State Department Form 230 and INS Form I-
7 | 600 for Adoptive Parent #14 who was adopting VEH, using the biographical data
8 | of VIT for VEH.

9 | (111) On or about October 19, 1999, Defendant LAURYN
10 | GALINDO caused Adoptive Parent #14 to pay a fee of \$3,500 in relation to the
11 | adoption of VIT.

12 | (112) On or about October 20, 1999, Defendant LAURYN GALINDO
13 | and other co-conspirators caused the State Department to issue an Immediate
14 | Relative Visa to VEH, based upon the false information contained in State
15 | Department Form 230 and INS Form I-600.

16 | ***Immediate Relative Visa for SON***

17 | (113) On or about September 9, 1999, a co-conspirator
18 | approached two adult Cambodians in a village near Siem Reap, and offered to
19 | send their five-year-old sister ("SON") to the United States.

20 | (114) On or about September 11, 1999, a co-conspirator conducted
21 | a physical exam on SON.

22 | (115) On or about September 16, Defendant LAURYN
23 | GALINDO faxed co-conspirator Lynn Devin a copy of medical test results for
24 | SON.

25 | (116) On or about September 24, 1999, co-conspirator Lynn Devin
26 | told Adoptive Parent #15 that SON was currently available for adoption at a
27 | Cambodian orphanage.

28 | (117) On or about September 24, 1999, co-conspirator Lynn Devin

1 caused Adoptive Parent #15 to wire transfer \$5,000 to Defendant LAURYN
2 GALINDO in relation to the adoption of SON.

3 (118) On or about September 24, 1999, co-conspirator Lynn Devin
4 caused Adoptive Parent #15 to pay an agency fee of \$2,500 in relation to the
5 adoption of SON.

6 (119) In late November 1999, Defendant LAURYN GALINDO
7 arranged to deliver SON to Adoptive Parent #15 at her apartment in Phnom
8 Penh, Cambodia.

9 (120) On or about December 1, 1999, Defendant LAURYN
10 GALINDO advised Adoptive Parent #15 to go ahead with the adoption of SON
11 and bring her to the United States, even though SON had siblings in Cambodia
12 and had never lived at the orphanage.

13 (121) On or about December 1, 1999, Defendant LAURYN
14 GALINDO completed a portion of State Department Form 230 and INS Form I-
15 600 for Adoptive Parent #15, falsely stating that SON had no relatives living in
16 Cambodia and that SON was residing at the Siem Reap Orphanage.

17 (122) On or about December 1, 1999, Defendant LAURYN
18 GALINDO and co-conspirators caused the State Department to issue an
19 Immediate Relative Visa to SON, based upon the false information contained in
20 State Department Form 230 and INS Form I-600.

21 (123) On or about December 1, 1999, Defendant LAURYN
22 GALINDO caused Adoptive Parent #15 to pay a fee of \$2,000 in relation to the
23 adoption of SON.

24 ***Immediate Relative Visa for SEY***

25 (124) On or about December 4, 1999, a co-conspirator conducted a
26 physical exam of a two-year old boy ("SEY") at the Siem Reap Orphanage while
27 SEY's birth mother was present in the room.

28 (125) On or about December 4, 1999, a co-conspirator ordered

1 Adoptive Parent #15 to leave Siem Reap Orphanage after Adoptive Parent #15
2 informed the co-conspirator that the woman holding SEY was SEY's birth mother
3 and that SEY was living in a building behind the Siem Reap Orphanage with both
4 his birth parents.

5 (126) On or about December 6, 1999, Defendant LAURYN
6 GALINDO faxed to co-conspirator Lynn Devin a copy of medical test results for
7 SEY that had been conducted on December 4, 1999, by a co-conspirator.

8 (127) On or about December 6, 1999, co-conspirator Lynn Devin
9 told Adoptive Parent #16 that SEY was currently available for adoption at a
10 Cambodian orphanage.

11 (128) On or about December 6, 1999, co-conspirator Lynn Devin
12 caused Adoptive Parent #16 to wire transfer \$5,500 to Defendant LAURYN
13 GALINDO in relation to the adoption of SEY.

14 (129) On or about December 6, 1999, co-conspirator Lynn Devin
15 caused Adoptive Parent #16 to pay an agency fee of \$2,500 in relation to the
16 adoption of SEY.

17 (130) On or about January 16, 2000, a co-conspirator delivered SEY
18 to Adoptive Parent #16 at the Sunway Hotel in Phnom Penh, Cambodia, while
19 SEY's birth mother was present in the hotel room.

20 (131) On or about January 18, 2000, Defendant LAURYN
21 GALINDO caused Adoptive Parent #16 to pay a fee of \$2,000 in relation to the
22 adoption of SEY.

23 (132) On or about January 18, 2000, Defendant LAURYN
24 GALINDO advised Adoptive Parent #16 to go ahead with the adoption of SEY
25 and bring him to the United States, in deliberate ignorance of the fact that SEY
26 had living parents and had never lived at the orphanage.

27 (133) On or about January 18, 2000, Defendant LAURYN
28 GALINDO advised Adoptive Parent #16 how to complete State Department Form

1 230 and INS Form I-600.

2 (134) On or about January 24, 2000, Defendant LAURYN GALINDO
3 and co-conspirators caused the State Department to issue an Immediate Relative
4 Visa to SEY, based upon the false information contained in State Department
5 Form 230 and INS Form I-600.

6 ***Immediate Relative Visa for DARI***

7 (135) On or about January 19, 2000, a co-conspirator conducted a
8 physical examination of a one-month-old boy ("SER") in Cambodia.

9 (136) On or about January 24, 2000, co-conspirator Lynn Devin told
10 Adoptive Parent #17 that SER was currently available for adoption at a
11 Cambodian orphanage.

12 (137) On or about February 7, 2000, co-conspirator Lynn Devin
13 caused Adoptive Parent #17 to pay an agency fee of \$2,500 in relation to the
14 adoption of SER.

15 (138) On or about February 16, 2000, co-conspirator Lynn Devin
16 caused Adoptive Parent #17 to wire transfer \$5,500 to Defendant LAURYN
17 GALINDO in relation to the adoption of SER.

18 (139) On or about February 27, 2000, a co-conspirator conducted a
19 physical examination of a two-month-old boy ("DARI") in Cambodia.

20 (140) On or about March 3, 2000, co-conspirator Lynn Devin had a
21 phone conversation with Adoptive Parent #17 concerning the feasibility of
22 completing an adoption of DARI using SER's identity and Cambodian documents.

23 (141) On or about March 4, 2000, Defendant LAURYN
24 GALINDO had a phone conversation with Adoptive Parent #17 concerning
25 completing an adoption of DARI using SER's identity and Cambodian documents,
26 and told Adoptive Parent #17 that birth dates and names are randomly assigned
27 at the orphanage and that DARI has only had his name and date of birth for a few
28 days.

1 (142) On or about March 15, 2000, co-conspirator Lynn Devin
2 caused Adoptive Parent #17 to fax a notarized "Child Acceptance & Medical
3 Release" to Seattle International Adoptions that listed the name of the child that
4 Adoptive Parent #17 was planning to adopt in Cambodia as, "SER, formerly
5 known as DARI."

6 (143) On or about March 21, 1999, a co-conspirator delivered DARI
7 to Adoptive Parent #17 at the WOVA Cham Chao Orphanage.

8 (144) On or about March 21, 2000, Defendant LAURYN
9 GALINDO caused Adoptive Parent #17 to pay a fee of \$3,500 in relation of the
10 adoption of DARI.

11 (145) On or about March 21, 2000, Defendant LAURYN
12 GALINDO completed a portion of State Department Form 230 and INS Form I-
13 600 for Adoptive Parent #17 who was adopting DARI, using the biographical data
14 of SER for DARI.

15 (146) On or about March 23, 2000, Defendant LAURYN GALINDO
16 and other co-conspirators caused the State Department to issue an Immediate
17 Relative Visa to DARI, based upon the false information contained in State
18 Department Form 230.

19 ***Immediate Relative Visa for PHO***

20 (147) On or about October 6, 2000, a co-conspirator told Adoptive
21 Parent #18 that a healthy eight-month old girl ("KES") was currently available for
22 adoption at a Cambodian orphanage.

23 (148) On or about October 16, 2000, a co-conspirator conducted a
24 physical examination of a six-week-old girl ("PHO") in Cambodia.

25 (149) On or about October 20, 2000, a co-conspirator sent co-
26 conspirator Lynn Devin a fax that contained the message that KES was "definitely
27 not an infant girl" and that they needed a replacement child.

28 (150) On or about October 22, 2000, a co-conspirator faxed co-

1 conspirator Lynn Devin a report marked "True Physical Exam Report" for PHO
2 that contained a handwritten message that PHO had been renamed KES since
3 the paperwork had already been started.

4 (151) On or about October 24, 2000, co-conspirator Lynn Devin
5 caused Adoptive Parent #18 to wire transfer \$5,500 to Defendant LAURYN
6 GALINDO in relation to the adoption of KES.

7 (152) On or about October 27, 2000, co-conspirator Lynn Devin
8 caused Adoptive Parent #18 to pay an agency fee of \$1,500 in relation to the
9 adoption of KES.

10 (153) On or about November 8, 2000, a co-conspirator informed
11 Adoptive Parent #18 that PHO was going to be substituted for KES, and that the
12 date of birth would be switched from February 7, 2000, to July 2, 2000.

13 (154) On or about December 11, 2000, a co-conspirator delivered
14 PHO to Adoptive Parent #18 at the WOVA Cham Chao Orphanage.

15 (155) On or about December 11, 2000, Defendant LAURYN
16 GALINDO caused Adoptive Parent #18 to pay a fee of \$3,500 in relation to the
17 adoption of PHO.

18 (156) On or about December 11, 2000, a co-conspirator advised
19 Adoptive Parent #18 who was adopting PHO, how to complete a portion of State
20 Department Form 230 and INS Form I-600, using the biographical data of KES
21 for PHO.

22 (157) On or about December 13, 2000, Defendant LAURYN
23 GALINDO and other co-conspirators caused the State Department to issue an
24 immediate Relative Visa to PHO, based upon the false information contained in
25 State Department Form 230 and INS Form I-600.

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

27 FORFEITURE

28 8. Upon conviction of the offense alleged in Count 1 of this Information,

1 Defendant LAURYN GALINDO, and others known and unknown, shall forfeit to
2 the United States of America, pursuant to Title 18, United States Code, Section
3 982(a)(6)(A), any and all property, real or personal, constituting, derived from, or
4 traceable to, the proceeds obtained, directly or indirectly, from the commission of
5 the offense, or that was used to facilitate the commission of the offense,
6 including, but not limited to, the following property:

- 7
- 8 a. The residence and real property located at 5409 Weke Road,
Hanalei, Hawaii, owned under the name of K-4 Partners, and
any additional properties purchased by K-4 Partners;
- 9
- 10 b. All United States currency, funds, or other monetary
instruments credited to account number 2410011189 in the
11 name of K-4 Partners, located at Northwest Bank (formerly
Interwest Bank) in Mercer Island, Washington, over which
Lynn Devin and her husband had signatory authority;
- 12
- 13 c. All United States currency, funds, or other monetary
instruments credited to account number 84003299 in the name
14 of K-4 Partners, located at the First Hawaiian Bank in
Honolulu, Hawaii, over which Lynn Devin and her husband
had signatory authority;
- 15
- 16 d. All United States and foreign currency, funds, or other
monetary instruments credited to account number
17 800032144670, in the name of the Defendant and Lynn Devin,
located at the Cambodian Commercial Bank, in Phnom Penh,
Cambodia;
- 18
- 19 e. All United States and foreign currency, funds, or other
monetary instruments credited to account number
20 44710547903, in the name of Lakshmi, Ltd, located at the
Standard Chartered Bank in Hong Kong, over which the
Defendant and Lynn Devin had signatory authority;
- 21
- 22 f. All United States and foreign currency, funds, or other
monetary instruments credited to account number
23 243032208270, in an unknown name, located at the Hong
Kong/Shanghai Bank in Tanglin, Singapore, over which the
Defendant and Lynn Devin had signatory authority;
- 24
- 25 g. All United States and foreign currency, funds, or other
monetary instruments credited to account number
26 #260207980600, in an unknown name, located at the Hong
Kong/Shanghai Bank in Tanglin, Singapore, over which the
Defendant and Lynn Devin had signatory authority; and
- 27
- 28 h. A 2000 Jaguar XKB Convertible with VIN number
SAJJA42CXNA01756, registered to Lakshmi, Ltd., a Samoan

1 company owned by the Defendant.

2 9. If any of the property described above as being subject to forfeiture
3 as a result of any act or omission of the Defendant:

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

13 it is the intent of the United States, pursuant to Title 21, United States Code,
14 Section 853(p), as incorporated by Title 18, United States Code, Section
15 982(b)(1), to seek forfeiture of any other property of said Defendant up to the
16 value of the above forfeitable property.

17 COUNT 2

18 (Conspiracy to Launder Money)

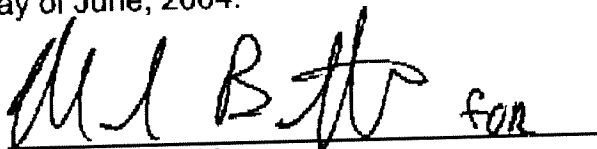
19 1. The allegations set forth in Count One of this Information are re-
20 alleged and incorporated herein by reference.

21 2. Beginning in about 1997, and continuing through about December
22 2001, in the Western District of Washington and elsewhere, Defendant LAURYN
23 GALINDO, and others known and unknown, knowingly conspired to transport,
24 transmit, and transfer funds, and to cause other persons to do so, from a place in
25 the United States to a place outside the United States, with the intent to promote
26 the carrying on of specified unlawful activity, to wit, acts chargeable as visa fraud
27 under Title 18, United States Code, Section 1546, in violation of Title 18, United
28 States Code, Section 1956(a)(2)(A).


All in violation of Title 18, United States Code, Section 1956(h).

All in violation of Title 18, United States Code, Section 982(a)(1).


DATED this 22nd day of June, 2004.




JOHN MCKAY
United States Attorney



DOUGLAS B. WHALLEY
Assistant United States Attorney



JAMES M. LORD
Assistant United States Attorney



MICHAEL E. BARR
Trial Attorney, Domestic Security Section
Department of Justice

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