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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
February 2005 Grand Jury

UNITED STATES OF AMERICA,) CR No. 05-_____
)
Plaintiff,) I N D I C T M E N T
)
v.) [18 U.S.C. § 917: False
) Personation of Red Cross Members
TINO LEE,) or Agents; 18 U.S.C. § 2: Aiding
) and Abetting and Causing an Act
aka Robert Lopez, and) to be Done]
GINA LIZ NICHOLAS,)
aka Liz Nicholas,)
)
Defendants.)
)
_____)

The Grand Jury charges:
[18 U.S.C. §§ 917, 2]

On or about September 15, 2005, in Los Angeles County,
within the Central District of California, within the United
States, defendants TINO LEE, also known as ("aka") Robert Lopez,
and GINA LIZ NICHOLAS, aka Liz Nicholas, falsely and fraudulently
held themselves out as and represented and pretended

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1 to be members of and agents for the American National Red Cross
2 for the purpose of soliciting, collecting, and receiving money
3 and material.

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A TRUE BILL

Foreperson

DEBRA WONG YANG
United States Attorney

THOMAS P. O'BRIEN
Assistant United States Attorney
Chief, Criminal Division

CHRISTINE C. EWELL
Assistant United States Attorney
Chief, Major Frauds Section

DAVID K. WILLINGHAM
Assistant United States Attorney
Deputy Chief, Major Frauds Section

ELLYN MARCUS LINDSAY
Assistant United States Attorney
Major Frauds Section