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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN ARTHUR LANKFORD,  
GLEN LOUIS COZART,  
MAX SAMUEL BENNETT TURBETT, and  
MATTHEW PHILLIP HART,

Defendants.

No. 8:24-CR-00077(A)-WLH

F I R S T  
S U P E R S E D I N G  
I N D I C T M E N T

[18 U.S.C. § 1951(a): Conspiracy to Commit Extortion and Attempted Extortion; 18 U.S.C. § 241: Conspiracy Against Rights; 18 U.S.C. § 242: Deprivation of Rights Under Color of Law; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this First Superseding Indictment:

A. RELEVANT PERSONS AND ENTITIES

1. The Los Angeles County Sheriff's Department ("LASD") was a law enforcement agency within the Central District of California. Among other responsibilities, LASD provided municipal police services

1 within Los Angeles County, California, through its thousands of sworn  
2 deputies.

3 2. Defendant STEVEN ARTHUR LANKFORD was a sworn law  
4 enforcement officer and LASD deputy from approximately 1984 through  
5 approximately March 2017. At the time of his retirement, defendant  
6 LANKFORD was a detective in the LASD Homicide Bureau.

7 3. From approximately July 2017 through approximately April  
8 2020, defendant LANKFORD worked as a "hire-back" or "reserve" deputy  
9 with the LASD Homicide Bureau. As a hire-back deputy, defendant  
10 LANKFORD signed annual 120-day contracts, which permitted him to work  
11 for LASD for up to approximately 120 days or 960 hours per year. As  
12 a hire-back deputy, defendant LANKFORD was a sworn law enforcement  
13 officer subject to the same oath of duty and rules of conduct as a  
14 full-time deputy. This oath and these rules prohibited LASD  
15 personnel from using their law enforcement status and related  
16 equipment for personal use or for non-legitimate law enforcement  
17 purposes.

18 4. Defendant LANKFORD owned and operated Apollo Process Server  
19 ("Apollo"), a California corporation based in Santa Clarita and  
20 Canyon Country, California, that provided service of process for  
21 entities and individuals.

22 5. Defendant GLEN LOUIS COZART was a sworn law enforcement  
23 officer and LASD deputy from approximately 1982 through approximately  
24 1995.

25 6. Defendant COZART owned and operated Glen Cozart  
26 Investigations, Inc. ("GCI"), a California corporation based in  
27 Rancho Cucamonga and Upland, California, that provided private  
28 investigation and security services.

1           7.     Defendant MAX SAMUEL BENNETT TURBETT was a United Kingdom  
2 citizen and former member of the United Kingdom military who resided  
3 in Australia and England.

4           8.     Defendant TURBETT owned and operated Oracle Investigations  
5 Pty. Ltd. ("Oracle Investigations"), a United Kingdom entity based in  
6 Australia and the United Kingdom, that provided private investigation  
7 and asset recovery services globally.

8           9.     Defendant MATTHEW PHILLIP HART was an Australian citizen  
9 and former member of the Australian military who resided in  
10 Australia. Defendant HART owned and operated AGILIS Global Pty.  
11 Ltd., an Australia-based entity, that provided risk management  
12 services globally.

13          10.    Coconspirator A was a Chinese citizen who resided in the  
14 People's Republic of China ("China") and France. Coconspirator A was  
15 the former business partner of Victim 1.

16          11.    Individual B was a sworn law enforcement officer and LASD  
17 deputy from approximately 1989 through approximately March 2019. At  
18 the time of his retirement, Individual B was a sergeant in the LASD  
19 International Liaison Unit, where he was responsible for  
20 communicating with the Chinese Consulate regarding law enforcement  
21 issues. Individual B was fluent in English and Mandarin.

22          12.    Individual B owned and operated Company B, a California  
23 limited liability company located in Alhambra, California, that  
24 provided real estate and business development services.

25          13.    Individual C was a notary public and a resident of  
26 California.

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1           14. Individual D was an unknown white male who defendant  
2 TURBETT and/or defendant COZART hired to provide security and/or  
3 surveillance services.

4           15. Victim 1 was a businessman and resident of Irvine,  
5 California. Victim 1 was a Chinese citizen and a lawful permanent  
6 resident of the United States.

7           16. Victim 2 was a marketing executive and resident of Irvine.  
8 Victim 2 was married to Victim 1. Victim 2 was a Chinese citizen and  
9 a lawful permanent resident of the United States.

10          17. Victim 3 was Victim 1 and Victim 2's 21-year-old son and a  
11 resident of Irvine. Victim 3 was a Chinese citizen and a lawful  
12 permanent resident of the United States.

13          18. Victim 4 was Victim 1 and Victim 2's four-year-old son.  
14 Victim 4 was a resident of Irvine and a United States citizen.

15          19. Victim 1, Victim 2, Victim 3, and Victim 4 (collectively,  
16 the "victims") lived in a three-story condominium in Irvine (the  
17 "home"). The home had the following layout: (1) the first level  
18 opened onto the street and included a small foyer inside the front  
19 door, a hallway leading to the garage, a bedroom where Victim 3  
20 resided, and a staircase to the second level; (2) the second level  
21 consisted of a great room with an open kitchen and living area, with  
22 a table in the kitchen and a couch in the living area; and (3) the  
23 third floor had multiple bedrooms, including the primary bedroom  
24 where Victim 1, Victim 2, and Victim 4 resided.

25 B.    THE BUSINESS DISPUTE AND RED NOTICE

26          20. Victim 1 and Coconspirator A were shareholders in Shandong  
27 Sinorgchem Chemical Industry Co. ("Shandong") and Shanghai Sinorgchem  
28 Chemical Industry Co. ("Shanghai Sinorgchem"), which were Chinese

1 companies. In approximately 2008, Jiangsu Sinorgchem Technology Co.  
2 Ltd. ("Jiangsu Sinorgchem"), a Chinese corporation, purchased  
3 Shandong and Shanghai Sinorgchem's assets.

4 21. Victim 1 and Coconspirator A had an ongoing business  
5 dispute regarding the ownership of their shares in Jiangsu  
6 Sinorgchem. There had been at least three civil lawsuits in China  
7 and a civil lawsuit in Atlanta, Georgia (the "Georgia lawsuit"). In  
8 2019, the third civil action in China was pending.

9 22. On or about October 6, 2013, Coconspirator A stated in a  
10 civil court filing in the Georgia lawsuit that the International  
11 Criminal Police Organization ("INTERPOL") issued a "Red Notice" for  
12 Victim 1 on May 23, 2013 relating to criminal charges in China and  
13 attached to the court filing a purported copy of the "Red Notice." A  
14 Red Notice was a request issued by INTERPOL to law enforcement  
15 worldwide related to some legal action originating in the requesting  
16 nation. Victim 1 understood that the conduct alleged in the Red  
17 Notice issued for him related to his civil business dispute with  
18 Coconspirator A. Victim 1's Red Notice by itself did not authorize  
19 an arrest of Victim 1 in the United States.

20 23. Because defendants LANKFORD, COZART, TURBETT, and HART  
21 (collectively, the "defendants") were not acting in a legitimate law  
22 enforcement capacity at any time during the events described in this  
23 First Superseding Indictment, they had no legal authority to arrest  
24 or detain anyone, including Victim 1, based upon a Red Notice.

25 24. These Introductory Allegations are incorporated into each  
26 count of this First Superseding Indictment.

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1 COUNT ONE

2 [18 U.S.C. § 1951(a)]

3 [ALL DEFENDANTS]

4 A. OBJECT OF THE CONSPIRACY

5 25. Beginning on a date unknown and continuing through in or  
6 around November 2019, in Orange County, within the Central District  
7 of California, and elsewhere, defendants STEVEN ARTHUR LANKFORD, GLEN  
8 LOUIS COZART, MAX SAMUEL BENNETT TURBETT, and MATTHEW PHILLIP HART,  
9 together with others known and unknown to the Grand Jury, conspired  
10 with each other to knowingly and intentionally interfere with  
11 commerce by extortion, in violation of Title 18, United States Code,  
12 Section 1951(a).

13 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
14 ACCOMPLISHED

15 26. The object of the conspiracy was to be accomplished through  
16 the following means, among others:

17 a. Through Oracle Investigations, defendant TURBETT would  
18 provide private investigation and asset recovery services to clients  
19 around the world. Defendant TURBETT would accept jobs for clients  
20 engaged in ongoing civil litigation. As compensation for Oracle  
21 Investigation's services, defendant TURBETT typically would receive a  
22 percentage of the assets recovered on behalf of his clients.

23 Defendant TURBETT would subcontract with local private investigation  
24 ("PI") companies to carry out operations outside of Australia.

25 b. Through GCI, defendant COZART would provide private  
26 security and PI services to clients. Defendant COZART would work as  
27 a subcontractor to provide his services to companies, including  
28 Oracle Investigations. Defendant COZART would assist Oracle

1 Investigation in conducting a local operation in California,  
2 including by locating the subject, conducting surveillance, running  
3 database checks, and assembling a local team to approach and obtain  
4 assets from the subject. Defendant COZART would hire current and  
5 former law enforcement officers, interpreters, and public notaries.

6 c. To increase the likelihood of successfully recovering  
7 assets during the operation, defendants TURBETT and COZART would hire  
8 defendant LANKFORD. Defendant LANKFORD would, among other things,  
9 prepare for operations by conducting searches in law enforcement  
10 databases, including the National Crime Information Center database  
11 using his Justice Data Interface Controller terminal at LASD. During  
12 the operation, defendant LANKFORD would identify himself as a law  
13 enforcement officer, show his LASD badge and identification, drive  
14 his unmarked LASD vehicle, perform searches and other activities  
15 under the guise of conducting legitimate law enforcement operations,  
16 and use the power of his LASD badge and status as a law enforcement  
17 officer to intimidate and coerce the subject into complying with  
18 defendant LANKFORD's demands, including to relinquish assets.

19 d. Defendants LANKFORD, COZART, and TURBETT would attempt  
20 to gain entry to the subject's residence by falsely presenting  
21 themselves as law enforcement officers or other individuals engaged  
22 in a legitimate law enforcement operation. Defendants LANKFORD and  
23 COZART would identify defendant LANKFORD as a law enforcement officer  
24 and, if the subject was not a United States citizen, falsely identify  
25 defendant COZART as an "Immigration" official.

26 e. To coerce the subject into relinquishing assets and  
27 ensure the security of the operation, defendants LANKFORD, COZART,  
28 and TURBETT would conduct surveillance and employ experienced

1 security, including former law enforcement officers and foreign  
2 nationals who had been members of the military. Defendant TURBETT  
3 would hire defendant HART to provide security for the operation.  
4 Defendants TURBETT and COZART would use Individual D to conduct  
5 surveillance during the operation and provide security as needed. By  
6 using a large team of current and former law enforcement officers and  
7 former military members, defendants would increase the likelihood of  
8 successfully intimidating the subject into relinquishing assets.

9 f. Once inside a home, defendants LANKFORD, COZART,  
10 TURBETT, and HART would: (1) search the residence without a warrant;  
11 (2) seize the occupants' cell phones; (3) force the occupants into a  
12 single room; (4) refuse to allow the occupants to leave; (5) refuse  
13 to allow the occupants to contact an attorney; (6) employ the use of  
14 nonviolent threats, including arrest, deportation, turning the  
15 occupants over to hostile government authorities, and separating  
16 parents from their children permanently; (7) employ the use of  
17 threats of force, fear, or violence; and (8) use physical force.  
18 Defendant HART would use physical force and injure the occupants to  
19 prevent them from leaving. Defendant LANKFORD would threaten to  
20 arrest the occupants if they resisted force, defended themselves, or  
21 reported the incident to police.

22 g. To ensure that the extortion was successful and to  
23 avoid detection by law enforcement, defendants would: (1) threaten  
24 the victims with arrest if they reported defendants' criminal  
25 conduct; (2) leave the United States after the operation; (3) lie,  
26 omit information, and provide misleading information to legitimate  
27 law enforcement to impede the investigation into defendants' criminal  
28 conduct; (4) attempt to influence the statements of others to law



1 enforcement; and (5) lie, omit information, and provide misleading  
2 information in civil litigation relating to defendants' conduct.

3 C. OVERT ACTS

4 27. On or about the following dates, in furtherance of the  
5 conspiracy, and to accomplish the object of the conspiracy,  
6 defendants LANKFORD, COZART, TURBETT, and HART, and others known and  
7 unknown to the Grand Jury, committed and caused to be committed  
8 various overt acts within the Central District of California, and  
9 elsewhere, including the following:

10 Overt Act No. 1: On December 16, 2018, Coconspirator A  
11 emailed defendant TURBETT about assisting Coconspirator A with  
12 finding Victim 1 and recovering assets from Victim 1. Coconspirator  
13 A said she wanted "my paper he stolen [sic] from my Singapore home  
14 after he fled to the US." Coconspirator A claimed that Victim 1 was  
15 wanted by the Chinese government "for five years" and that Victim 1's  
16 "passport has already expired long time." Coconspirator A asked  
17 defendant TURBETT to "evaluate this case," which Coconspirator A  
18 described as a "very big case." Coconspirator A said that if  
19 defendant TURBETT helped her "solve this," "we both can retire."

20 Overt Act No. 2: On December 16, 2018, Coconspirator A asked  
21 defendant TURBETT via email "to try to find" Victim 1. Coconspirator  
22 A explained that she and Victim 1 had "very long litigation in China  
23 and America[]," noting, "I pay [sic] so much for the lawyers. But  
24 now I think used [sic] lawyers is not the smart way to do it . . . .  
25 So I want you to find a solution going to finish this problem. I so  
26 happy [to] know you and meet you. This for me have new way can solve  
27 the problems. I really so tired to speak all the lawyers and courts.  
28 But this time[,] it's last time in high court. If I win this case[,]

1 we'll finish. If I lost this case[,] I we'll [sic] lost everything.  
2 Because I pledge so much money in court. So just go to do everything  
3 you can. What ever all the costs[.] I want you make succeed for  
4 this case."

5 Overt Act No. 3: On June 6, 2019, defendant TURBETT emailed  
6 Coconspirator A with the subject line: "Re: Collections." In the  
7 email, defendant TURBETT requested that Coconspirator A provide "a  
8 couple of documents" to be signed by Victim 1 for the "return" of  
9 Coconspirator A's equity in a company and money, including (1) a  
10 document transferring Victim 1's equity to Coconspirator A and (2) a  
11 contract stating that Victim 1 was repaying the funds that  
12 Coconspirator A had "loaned" Victim 1 "and a justification as to  
13 why." Defendant TURBETT said, "This is essential as without it the  
14 banks will not release the funds especially because [it's] such a  
15 large transfer."

16 Overt Act No. 4: On June 6, 2019, defendant TURBETT emailed  
17 Coconspirator A with the subject line: "Contract." Defendant TURBETT  
18 wrote: "I require a contract between yourself and [Victim 1] to  
19 explain why he is repaying you the money he has taken. For  
20 example[,] he is repaying a loan or entering into a business deal.  
21 This is to ensure that the bank are [sic] happy to release the  
22 funds."

23 Overt Act No. 5: On June 7, 2019, Coconspirator A sent  
24 defendant TURBETT an email, stating, "Thank you my dear friend[.] I  
25 we'll [sic] send the contract in later. thank you so much."

26 Overt Act No. 6: On June 8, 2019, Coconspirator A forwarded  
27 defendant TURBETT an email with the subject line "Forward: Settlement  
28 Agreement [translated]" and attached a document titled "Settlement

1 Agreement [translated] 20190608-CN-EN.docx." The forwarded email was  
2 from a law firm located in Beijing, China (the "Beijing Law Firm").  
3 The document was titled "Settlement Agreement" and listed  
4 Coconspirator A and Victim 1 as the parties. The Settlement  
5 Agreement purported to "solve the dispute over the equity entrustment  
6 of the shares of" Jiangsu Sinorgchem. Per the Settlement Agreement,  
7 Victim 1 would transfer his equity in Jiangsu Sinorgchem to  
8 Coconspirator A and agree to "return" approximately \$36,972,386.51 to  
9 Coconspirator A. Defendant TURBETT responded, "Thanks," and  
10 Coconspirator A said, "The most important and exciting time we'll  
11 [sic] be coming."

12 Overt Act No. 7: In or around early June 2019, defendant  
13 TURBETT hired defendant COZART, via GCI, to help locate Victim 1 and  
14 obtain Victim 1's signature on the documents provided by  
15 Coconspirator A in order obtain equity in a company and approximately  
16 \$36,972,386.51 from Victim 1.

17 Overt Act No. 8: In or around early June 2019, defendant  
18 COZART hired defendant LANKFORD to help locate Victim 1 and obtain  
19 Victim 1's signature on the documents provided by Coconspirator A in  
20 order obtain equity in a company and approximately \$36,972,386.51  
21 from Victim 1.

22 Overt Act No. 9: On June 7, 2019, defendant LANKFORD searched  
23 for Victim 1's name and date of birth in the National Crime  
24 Information Center database using defendant LANKFORD's Justice Data  
25 Interface Controller terminal at LASD, in violation of LASD policy.  
26 The database printout defendant LANKFORD obtained stated that Victim  
27 1 was a fugitive wanted in China and provided the following warnings:  
28 "WARNING - DO NOT ARREST BASED UPON THIS FOREIGN FUGITIVE RECORD[.]

1 NOTE THAT UNDER US LAW, THE EXISTENCE [ ] OF CHARGES IN CHINA ALONE  
2 DOES NOT AUTHORIZE THE SUBJECT'S ARREST IN THE [ ] UNITED STATES[.]  
3 HOWEVER, THE FOREIGN CHARGES AND THE PRESENT CIRCUMSTANCES MAY  
4 PROVIDE A BASIS UNDER THE LAWS AND REGS APPLICABLE TO YOUR AGENCY TO  
5 DETAIN THE SUBJ, AT LEAST TEMPORARILY, IN ORDER TO OBTAIN ADDITIONAL  
6 INFO."

7 Overt Act No. 10: On June 8, 2019, defendant COZART emailed  
8 Individual B about needing "a Chinese speaker" to "help on a case for  
9 a few days" and said, "Pay is good." Individual B agreed to assist  
10 defendant COZART with translation services.

11 Overt Act No. 11: On June 9, 2019, Coconspirator A forwarded  
12 defendant TURBETT an email with the subject line "final" and wrote:  
13 "All the lawyers have checked again . . . make sure for the money[.]  
14 Thank you so much for your everything."

15 Overt Act No. 12: On June 10, 2019, defendant TURBETT traveled  
16 from Sydney, Australia, to Los Angeles, California, and entered the  
17 United States on a tourist visa.

18 Overt Act No. 13: On June 12, 2019, defendant HART traveled  
19 from Sydney to Los Angeles.

20 Overt Act No. 14: On June 12, 2019, defendants LANKFORD,  
21 COZART, TURBETT, and HART, as well as Individual B, met at a Holiday  
22 Inn in Santa Ana, California, to discuss the plan for obtaining  
23 Victim 1's signature.

24 Overt Act No. 15: On June 12, 2019, defendant COZART  
25 instructed Individual C to stand by at a Starbucks near the victims'  
26 home to provide notary services. A few hours later, defendant COZART  
27 informed Individual C that her services were not needed that day.

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1           Overt Act No. 16:    On June 15, 2019, defendants LANKFORD,  
2 COZART, and TURBETT, as well as Individual B, met at a hotel in  
3 Orange County, California, to discuss the plan for obtaining Victim  
4 1's signature. During that meeting, defendant TURBETT said that the  
5 team would meet at the Holiday Inn in Santa Ana on June 17, 2019 and  
6 then go to the victims' house.

7           Overt Act No. 17:    On June 17, 2019, around 8:00 a.m.,  
8 defendants LANKFORD, COZART, TURBETT, and HART, as well as Individual  
9 B and Individual D, met at the Holiday Inn in Santa Ana.

10          Overt Act No. 18:    On June 17, 2019, around 8:30 a.m., the team  
11 drove from the Holiday Inn in Santa Ana to the victims' home.  
12 Defendant LANKFORD transported defendant TURBETT and/or defendant  
13 COZART to the victims' home in his LASD vehicle, in violation of LASD  
14 policy. Individual B rode with Individual D, who was tall and  
15 muscular. Once they arrived at the victims' home, Individual B and  
16 Individual D waited in their vehicle on the perimeter of the home,  
17 while defendants LANKFORD and TURBETT approached the front door.

18          Overt Act No. 19:    On June 17, 2019, around 8:30 a.m., as  
19 Victim 1 was leaving from his front door, defendants LANKFORD and  
20 COZART approached Victim 1. Defendant COZART falsely identified  
21 himself as an official with "Immigration," that is, Immigration and  
22 Customs Enforcement, and introduced defendant LANKFORD as a police  
23 officer. Defendant LANKFORD showed Victim 1 his LASD badge and LASD  
24 identification card and identified himself as a detective. Defendant  
25 COZART asked Victim 1 to identify himself, which Victim 1 did.  
26 Defendants COZART and LANKFORD asked to speak with Victim 1 inside  
27 the home.

28

1           Overt Act No. 20:    On June 17, 2019, after Victim 1 agreed to  
2 talk to defendants LANKFORD and COZART and directed them to the  
3 second floor of his home, defendants TURBETT and HART entered the  
4 home. Defendant TURBETT introduced himself as "Max Turbett."  
5 Defendant HART, who was wearing a backpack, did not identify himself.  
6 Defendant LANKFORD told Victim 1 that the men were with him, falsely  
7 suggesting they were law enforcement.

8           Overt Act No. 21:    On June 17, 2019, defendant LANKFORD seized  
9 Victim 1's phone without Victim 1's permission. Defendant LANKFORD  
10 asked Victim 1 if there were any guns in the home, to which Victim 1  
11 responded there were not. Defendant LANKFORD asked if anyone else  
12 was present, to which Victim 1 responded his wife and two sons were  
13 present.

14           Overt Act No. 22:    On June 17, 2019, defendants LANKFORD and  
15 HART told Victim 1 they were going to search the home for other  
16 occupants for safety reasons and began searching the home. Without  
17 permission, defendants LANKFORD and HART entered the third-level  
18 bedroom where they found Victim 2, who was still in her pajamas, with  
19 her young child, Victim 4. Defendant LANKFORD introduced himself as  
20 a police officer, showed his LASD badge or identification card, and  
21 directed Victim 2 to go downstairs. Defendant LANKFORD said they  
22 were there about Victim 2's husband.

23           Overt Act No. 23:    On June 17, 2019, defendant HART searched  
24 Victim 2's bedroom and an adjoining bathroom. Defendants LANKFORD  
25 and HART located and seized Victim 2's cellphone.

26           Overt Act No. 24:    On June 17, 2019, when Victim 2 arrived on  
27 the second floor, one of the defendants demanded that Victim 2 not  
28

1 speak Chinese, only English, after Victim 2 told Victim 1 in Mandarin  
2 that the men had taken her phone.

3 Overt Act No. 25: On June 17, 2019, at defendant COZART's  
4 direction, Individual B entered the home on the first floor to  
5 provide translation services if needed. Individual D stayed in the  
6 car.

7 Overt Act No. 26: On June 17, 2019, after Victim 3 discovered  
8 Individual B standing outside Victim 3's bedroom door, and after  
9 Victim 3 asked Individual B who he was, Individual B responded,  
10 "Don't worry about it." Defendant HART ordered Victim 3 to get  
11 dressed and come upstairs.

12 Overt Act No. 27: On June 17, 2019, when Victim 3's phone  
13 alarm went off, Individual B told Victim 3 not to answer the phone  
14 and to turn it off. One or more defendants directed Victim 3 to sit  
15 on the couch in the living area with Victim 2 and Victim 4 and seized  
16 Victim 3's phone. Defendant LANKFORD introduced himself to Victim 3  
17 as "Detective Lankford." One or more defendants held the victims'  
18 phones on a table near the kitchen.

19 Overt Act No. 28: On June 17, 2019, defendants TURBETT and  
20 COZART told Victim 1 that he was not allowed to leave the kitchen  
21 table. Defendant LANKFORD showed Victim 1 a printout containing  
22 information about the Red Notice from China. When Victim 1 tried to  
23 explain that the charges were not true and asked for a lawyer,  
24 defendant LANKFORD said something to the effect of, "Not right now."

25 Overt Act No. 29: On June 17, 2019, defendant TURBETT told  
26 Victim 1 that they were there to get Victim 1's signature on various  
27 settlement agreements relating to the dispute with Coconspirator A.  
28 When Victim 1 explained that he had prevailed in all legal actions

1 against Coconspirator A, defendant TURBETT indicated that things  
2 could go much harder for Victim 1 if he did not cooperate and claimed  
3 that the men in the home had been watching and following Victim 1 for  
4 years. Defendant TURBETT said that Coconspirator A would not bother  
5 Victim 1 or his family if Victim 1 signed the documents.

6 Overt Act No. 30: On June 17, 2019, defendant COZART told  
7 Victim 1 that he and Victim 2 would be deported and separated from  
8 their family, including their four-year-old son, Victim 4, unless  
9 Victim 1 signed the documents.

10 Overt Act No. 31: On June 17, 2019, when Victim 1 asked to see  
11 defendant COZART's badge, defendant COZART refused and said, "I work  
12 for him," referring to defendant LANKFORD.

13 Overt Act No. 32: On June 17, 2019, defendant LANKFORD said  
14 that if Victim 1 and Victim 2 were deported, Victim 4 would be placed  
15 into foster care and that Victim 1 and Victim 2 would never see him  
16 again. Due to the open layout of the living area and proximity of  
17 the kitchen table to the couch, defendants were aware that Victim 2,  
18 Victim 3, and Victim 4 could overhear their threats to Victim 1  
19 regarding his and Victim 2's deportation and loss of parental rights.

20 Overt Act No. 33: On June 17, 2019, defendants made clear to  
21 the victims that they did not intend to leave and that the victims  
22 were not allowed to leave until Victim 1 signed the documents.  
23 Defendants HART and LANKFORD took turns standing in the middle of the  
24 room between the victims and the stairway that led downstairs to an  
25 exit. When Victim 1 told defendants that Victim 3 needed to leave  
26 for a job opportunity, defendant HART stepped towards Victim 3 and  
27 demanded that he sit back down.

28



1           Overt Act No. 34:    On June 17, 2019, when Victim 1 attempted to  
2 escape by running down the stairs, defendant HART grabbed Victim 1 by  
3 the neck and shirt, yanked Victim 1 backwards up the stairs with such  
4 force that he ripped Victim 1's shirt, slammed Victim 1 against the  
5 wall, and choked Victim 1. Defendant HART then threatened, "Don't  
6 fuck with me. I'm not the police." When Victim 3 tried to pull  
7 defendant HART off his father, defendant HART shoved Victim 3 hard on  
8 his shoulder and collarbone, causing Victim 3 to fall backwards and  
9 hit his head on the wall. Victim 1 grabbed a knife and screamed, "If  
10 you aren't police, why are you in my house?" and told defendants to  
11 leave his home. Defendant TURBETT yelled for defendant LANKFORD to  
12 assist, shouting, "Officer, officer, he has a knife!" Defendant  
13 LANKFORD returned to the second floor and threatened to arrest Victim  
14 1 for brandishing the knife.

15           Overt Act No. 35:    On June 17, 2019, after defendant HART  
16 violently assaulted Victim 1 and Victim 3, defendants LANKFORD and  
17 TURBETT continued to threaten Victim 1 to obtain his signature on the  
18 documents. Defendant TURBETT said he wanted to resolve everything  
19 peacefully, but "those guys" had been chasing Victim 1 for a long  
20 time, from New York, to Georgia, to New York, and then to California,  
21 which were the cities where Victim 1 had lived since moving to the  
22 United States.

23           Overt Act No. 36:    On June 17, 2019, defendant LANKFORD  
24 threatened to take Victim 1 to the Chinese Consulate in Los Angeles  
25 unless Victim 1 signed the documents. When Victim 1 asked why  
26 defendant LANKFORD would take him to the Chinese Consulate since he  
27 was a lawful permanent resident, defendant LANKFORD grabbed Victim 1  
28 by the arm, brandished a pair of handcuffs, and said, "Let's go."

1 Defendant LANKFORD told Victim 1 that he was not a "dirty cop," but  
2 that unless Victim 1 signed the documents in five minutes, he would  
3 take Victim 1 to the Chinese Consulate.

4 Overt Act No. 37: On June 17, 2019, when Victim 1 still had  
5 not signed the documents, defendant LANKFORD falsely stated that  
6 "Homeland Security" was waiting. When Victim 1 pointed out that the  
7 Red Notice said, "Do not arrest," defendant LANKFORD got angry and  
8 pointed to the language that said, "However, can temporarily hold and  
9 require additional information." Defendant LANKFORD said something  
10 to the effect of: "You think I didn't do my homework? I'll put you  
11 in the car and bring you to the Chinese Consulate, and I'll just  
12 leave you there."

13 Overt Act No. 38: On June 17, 2019, defendant TURBETT  
14 presented various settlement agreements to Victim 1. In fear for the  
15 safety of his family and himself following several hours of  
16 defendants' threats and violence, Victim 1 began reviewing and  
17 discussing the documents with defendant TURBETT.

18 Overt Act No. 39: On June 17, 2019, defendant TURBETT called  
19 Coconspirator A on the phone to help provide Victim 1 assurances that  
20 Coconspirator A would no longer threaten Victim 1 and his family's  
21 safety if he signed the documents. During the call, a portion of  
22 which defendant TURBETT put on speaker phone, Coconspirator A  
23 confirmed that she had sent the team to Victim 1's house and that  
24 defendant TURBETT was acting on her behalf. Following the phone  
25 call, defendant TURBETT assured Victim 1 that Coconspirator A would  
26 help Victim 1 get his passport back by removing the criminal charges  
27 and the Red Notice in China. When Victim 1 requested that they write  
28 down those agreements, defendant TURBETT agreed and allowed Victim 3

1 to go downstairs to get a piece of paper to memorialize those  
2 agreements. When Victim 3 went downstairs to get the paper, he ran  
3 into defendant HART who said, "There are a lot of people behind this  
4 that are less peaceful than us. You don't want anything to happen to  
5 your family, right?"

6 Overt Act No. 40: On June 17, 2019, around 11:00 a.m., through  
7 the use of force, threats of force, fear, and violence, and  
8 nonviolent threats, defendants pressured Victim 1 to agree to sign a  
9 document titled "Settlement Agreement," which (1) transferred Victim  
10 1's shares in Jiangsu Sinorgchem to Coconspirator A and (2) withdrew  
11 the lawsuit pending against Coconspirator A in China (the "Equity  
12 Agreement").

13 Overt Act No. 41: On June 17, 2019, between approximately 9:00  
14 to 10:00 a.m., Individual C arrived at a Starbucks near the victims'  
15 home to stand by in case her notary services were required, per  
16 defendant COZART's instructions.

17 Overt Act No. 42: On June 17, 2019, around 11:00 a.m.,  
18 defendant COZART picked up Individual C from the Starbucks and drove  
19 her to the victims' home.

20 Overt Act No. 43: On June 17, 2019, around 11:00 a.m.,  
21 defendant COZART brought Individual C inside the victims' home.  
22 Individual C waited in the entryway for approximately 15 minutes. In  
23 the entryway, Individual C saw two large men and heard a baby crying.

24 Overt Act No. 44: On June 17, 2019, Victim 1 signed the Equity  
25 Agreement, which transferred Victim 1's disputed shares to  
26 Coconspirator A and dismissed the pending lawsuit in China, and  
27 defendant LANKFORD, defendant TURBETT acting on behalf of  
28 Coconspirator A, and Victim 1 signed the handwritten agreement, which

1 stated, among other things, that "the Interpol notice issued by China  
2 will be withdrawn" by Coconspirator A, "After signing the Settlement  
3 Agreement[,] [Coconspirator A] will guarantee she will withdraw the  
4 criminal case in China [and] withdraw the Interpol Red Notice," and  
5 "the USA authorities will not persue [sic] [Victim 1] for Interpol  
6 Red Notice" (collectively, the "Agreements").

7 Overt Act No. 45: On June 17, 2019, around 11:30 a.m.,  
8 defendant LANKFORD texted defendant COZART: "Max [TURBETT] is talking  
9 to [Victim 1] at front door. I'm outside. We will be leaving in a  
10 few minutes. [Victim 1] now wants to talk a lot. He totally  
11 understand [sic] and wanted this issues [sic] to go away. [unicorn  
12 emojis]."

13 Overt Act No. 46: On June 17, 2019, around when defendant  
14 LANKFORD left the victims' home, defendant LANKFORD told Victim 1  
15 that if Victim 1 reported the incident to authorities, the  
16 authorities would immediately arrest Victim 1.

17 Overt Act No. 47: On the afternoon of June 17, 2019,  
18 defendants LANKFORD, TURBETT, and COZART, as well as Individual B,  
19 went to lunch at a hotel to celebrate the successful completion of  
20 their mission to get Victim 1 to sign Coconspirator A's documents.  
21 During the lunch, one of the defendants mentioned that Victim 1 had  
22 pulled a knife and that either defendant LANKFORD or defendant  
23 TURBETT had been involved in a physical altercation with Victim 1.  
24 The attendees then discussed the physical altercation briefly.

25 Overt Act No. 48: On June 17, 2019, after Victim 1 had  
26 reported the incident to the Irvine Police Department ("IPD"),  
27 defendant LANKFORD spoke to an IPD officer via telephone. The IPD  
28 officer told defendant LANKFORD that Victim 1 had reported that

1 people claiming to be with LASD and "Immigration" had entered his  
2 home, forced Victim 1 to sign documents forfeiting his assets to  
3 someone in China, and were very physical with him. To prevent the  
4 IPD officer from investigating Victim 1's claims, defendant LANKFORD  
5 said he was a homicide detective with LASD and falsely stated to the  
6 IPD officer: (1) Victim 1 "consented to all parties" entering his  
7 home; (2) defendant LANKFORD was present at the victims' home to  
8 "keep the peace"; and (3) no force was used. Defendant LANKFORD also  
9 claimed that Victim 1 was "wanted" in China. Although IPD had no  
10 record of an LASD operation in IPD's jurisdiction that day, based in  
11 part on defendant LANKFORD's false statements and derogatory  
12 information about Victim 1 being "wanted," defendant LANKFORD  
13 convinced the IPD officer that defendant LANKFORD was at Victim 1's  
14 home for a legitimate law enforcement purpose. As a result, the IPD  
15 officer took a report but did not investigate the incident further  
16 and referred Victim 1 to LASD for further inquiries.

17 Overt Act No. 49: On June 17, 2019, following the incident,  
18 defendant COZART called Individual B and asked him to travel to China  
19 with the signed Agreements in exchange for \$25,000 plus expenses.  
20 Individual B accepted defendant COZART's offer.

21 Overt Act No. 50: On June 18, 2019, Individual B picked up the  
22 Agreements from defendant COZART and transported them to Guangzhou,  
23 China.

24 Overt Act No. 51: On June 18, 2019, defendant HART traveled  
25 from Los Angeles to Melbourne, Australia

26 Overt Act No. 52: On June 19, 2019, Individual B met with  
27 Coconspirator A and one of her associates in Guangzhou. During the  
28 meeting, Coconspirator A signed the Agreements.

1           Overt Act No. 53:    On June 20, 2019, Individual B transported  
2 the signed Agreements from Guangzhou to Los Angeles.

3           Overt Act No. 54:    On June 17, 2019, defendants TURBETT and  
4 LANKFORD had the following exchange via WhatsApp:

5           Defendant TURBETT: No answer. Will try again.

6           Defendant TURBETT: Any news?

7           Defendant LANKFORD: No. The first time I spoke with the  
8                                   officer, I told him to call me if he needed  
9                                   to ask me anymore [sic] question. He said  
10                                  he would. So, I'm guessing everything was  
11                                  resolved. Have you tried to call [Victim  
12                                  1]??

13          Defendant TURBETT: I tried but no answer, will try again in the  
14                                  morning.

15          Defendant LANKFORD: Copy.

16          Overt Act No. 55:    On June 18, 2019, Coconspirator A forwarded  
17 defendant TURBETT an email from the Beijing Law Firm with the subject  
18 line "letter."

19          Overt Act No. 56:    On June 18, 2019, defendant TURBETT sent  
20 defendant LANKFORD Victim 1's contact information via WhatsApp.  
21 Defendant LANKFORD responded: "Just called [Victim 1]. He did not  
22 answer and his voicemail was not set up to leave a message. I will  
23 call [the IPD officer] from Irvine this afternoon to see how his  
24 contact with [Victim 1] ended." A few hours later, defendant  
25 LANKFORD said, "Max can you call me."

26          Overt Act No. 57:    On June 21, 2019, defendant LANKFORD said to  
27 defendant TURBETT via WhatsApp, "Max, please give me a call. Thx."  
28 Defendant TURBETT responded by sending defendant TURBETT a phone

1 number with area code 714 and ending in 8699. Defendant LANKFORD  
2 responded, "Got it. That's an Orange County #. I [W]ill call it."

3 Overt Act No. 58: On June 21, 2019, defendant TURBETT  
4 forwarded a message to defendant LANKFORD: "Max, thanks for speaking  
5 with me. [FBI Special Agent] is my name. Just want to follow up  
6 about the red notice information. We can grab coffee at 8163 e  
7 Kaiser Blvd c, Anaheim 92808. Let me know what time works."

8 Overt Act No. 59: On June 21, 2019, defendant LANKFORD told  
9 defendant TURBETT via WhatsApp that he had reached out to a "friend"  
10 who "knows [FBI Special Agent]" and "will call." Defendant LANKFORD  
11 later said, "Max, I don't see a problem talking [to the] agent," but  
12 cautioned, "I would not answer any financial question regarding what  
13 you received for your service or what you paid for help here in  
14 California." Defendant LANKFORD told defendant TURBETT to "drop"  
15 defendant LANKFORD's "name and number" to the FBI Special Agent "if  
16 needed."

17 Overt Act No. 60: On June 21, 2019, Individual B recertified  
18 the Agreements at the California Secretary of State and the Chinese  
19 Consulate in Los Angeles.

20 Overt Act No. 61: On June 22, 2019, Individual B met defendant  
21 TURBETT in Palm Springs, California, and delivered the signed and  
22 certified Agreements to him.

23 Overt Act No. 62: On June 22, 2019, at approximately 8:00  
24 p.m., defendant TURBETT met with the FBI to discuss the incident with  
25 Victim 1 and his family.

26 Overt Act No. 63: On June 22, 2019, at approximately 9:02  
27 p.m., defendant TURBETT called defendant LANKFORD.

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1           Overt Act No. 64:    On June 22, 2019, at approximately 9:25  
2 p.m., defendant LANKFORD sent defendant COZART a text message that  
3 said: "Just talked to Max. He said everything is good. He spoke  
4 with the Agents and told them how it went down. The Agents were  
5 interested if any Chinese people from China were involved. I'll give  
6 you a call tomorrow. Going to bed. I had a very strenuous day  
7 hitting golf balls (total of 12 balls). I need sleep. Refresh my  
8 body and mind. Talk to you tomorrow. I was a little worried the  
9 Agents might hit my house looking for my Unicorn, but that's not the  
10 case. [three unicorn emojis][.]"

11           Overt Act No. 65:    On June 23, 2019, defendant TURBETT left the  
12 United States and traveled to Sydney.

13           Overt Act No. 66:    On an unknown date, defendant TURBETT sent  
14 the signed and certified Agreements to Coconspirator A via a courier.

15           Overt Act No. 67:    On July 13 through July 15, 2019, defendants  
16 LANKFORD and TURBETT had the following exchange via WhatsApp:

17           Defendant TURBETT: Steve, I need someone to visit [Victim 1]  
18                                   ASAP. Would you be happy to?

19           Defendant LANKFORD: Sure. Does he know I'm coming??

20           Defendant LANKFORD: Need to know what's up. Is [Victim 1] now a  
21                                   friendly??

22           Defendant LANKFORD: Max, Today I went by [Victim 1]'s home  
23                                   around 3:00 pm. No one answered the door.  
24                                   I waited around 30 mins and saw no activity.  
25                                   Steve

26           Overt Act No. 68:    On July 15, 2019, defendant TURBETT asked  
27 defendant LANKFORD if he had visited "the Irvine address or Pelican  
28 Hill," the latter of which refers to a gated community in Irvine.



1 Defendant LANKFORD responded that he had visited the Irvine address  
2 but offered, "If you have the Pelican Hill address send it be [sic].  
3 Thx." Defendant LANKFORD then asked, "Have you recently talked to  
4 [Victim 1]???" Defendant TURBETT responded, "I will find it. No, I  
5 have messaged him but not [sic] reply," to which defendant LANKFORD  
6 said, "Ok. Thanks. I will swing by the Pelican loc," that is, the  
7 Pelican Hill location.

8 Overt Act No. 69: On June 22, 2019, GCI billed Oracle  
9 Investigations a total of \$133,140 for the operation. The subject of  
10 the invoice was "Eagle." For defendant COZART, the GCI bill listed  
11 \$4,400 for daily investigation, \$37,500 for "bonus pay," and \$15,390  
12 for advance pay. For defendant LANKFORD, the GCI bill listed \$4,400  
13 for daily investigation and \$37,500 for "bonus pay." For Individual  
14 B, the GCI bill listed \$7,150 for daily investigation and \$25,000 for  
15 "bonus pay." For notary services, the GCI bill listed \$1,800 for  
16 "Docs prepared."

17 Overt Act No. 70: On July 4, 2019, defendant TURBETT emailed  
18 Coconspirator A and the Beijing Law Firm with the subject line  
19 "[Victim 1] contract details." In the email, defendant TURBETT  
20 provided Victim 1's telephone number and two residential addresses in  
21 California.

22 Overt Act No. 71: On July 5, 2019, GCI received a wire  
23 transfer of approximately \$133,140 from Oracle Investigations. The  
24 wire transfer included the reference "Eagle."

25 Overt Act No. 72: On July 15, 2019, GCI made an online payment  
26 of approximately \$28,000 to Apollo.

27 Overt Act No. 73: In or around June or July 2019, defendant  
28 COZART paid defendant LANKFORD approximately \$10,000 in cash.

1           Overt Act No. 74:    On July 30, 2019, Individual B deposited a  
2 check in the amount of approximately \$29,500 from GCI into Company  
3 B's bank account.

4           Overt Act No. 75:    On July 19, 2019, Individual B received a  
5 wire transfer from Oracle Investigations to Individual B's personal  
6 bank account of approximately \$6,406.

7           Overt Act No. 76:    On July 31, 2019, Oracle Investigations  
8 received a payment from Coconspirator A via "YMX Co. Ltd." in the  
9 amount of approximately \$419,813.33.

10          Overt Act No. 77:    On November 29, 2019, Coconspirator A  
11 emailed defendant TURBETT with the subject line "Good." In the  
12 email, Coconspirator A wrote: "Your done very good jobs[.] Thank you  
13 so much for everything."

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COUNT TWO

[18 U.S.C. §§ 1951(a), 2(a), 2(b)]

[ALL DEFENDANTS]

28. Beginning on a date unknown and continuing through in or around November 2019, in Orange County, within the Central District of California, and elsewhere, defendants STEVEN ARTHUR LANKFORD, GLEN LOUIS COZART, MAX SAMUEL BENNETT TURBETT, and MATTHEW PHILLIP HART, and others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and with intent to obtain property, attempted and willfully caused others to attempt to obstruct, delay, and affect interstate commerce by committing extortion, in that defendants LANKFORD, COZART, TURBETT, and HART, and others known and unknown to the Grand Jury, attempted to obtain property from Victim 1, namely, equity in a company and money, including approximately \$36,972,386.51, with his consent, by the wrongful use of actual or threatened force, violence, and fear, including by nonviolent threats of arrest, deportation, and loss of parental rights, and under color of official right.



1 limited to, Overt Acts numbered 1 through 77, as set forth in  
2 Paragraph 27 of Count One of this First Superseding Indictment, which  
3 are realleged and incorporated here.

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COUNT FOUR

[18 U.S.C. §§ 242, 2(a), 2(b)]

[ALL DEFENDANTS]

32. Beginning on a date unknown and continuing through in or around November 2019, in Orange County, within the Central District of California, and elsewhere, defendants STEVEN ARTHUR LANKFORD, GLEN LOUIS COZART, MAX SAMUEL BENNETT TURBETT, and MATTHEW PHILLIP HART, and others known and unknown to the Grand Jury, each aiding and abetting the other, while acting under color of the laws of the State of California, willfully deprived, and willfully caused to be deprived, Victim 1, Victim 2, Victim 3, and Victim 4 of rights secured and protected by the Constitution and laws of the United States, namely, the right to be free from unreasonable searches and seizures and the right to be from deprivation of property without due process of law by one acting under color of law.

In the commission of the said offense, defendants LANKFORD, COZART, TURBETT, and HART, and others known and unknown to the Grand Jury, each aiding and abetting the other, caused bodily injury to Victim 1 and Victim 3.

1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C) and Title 28, United States  
7 Code, Section 2461(c), in the event of any defendant's conviction of  
8 the offenses set forth in any of Counts One through Four of this  
9 First Superseding Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 (a) All right, title, and interest in any and all  
13 property, real or personal, constituting, or derived from, any  
14 proceeds traceable to the offenses;

15 (b) All right, title, and interest in any firearm or  
16 ammunition involved in or used in any such offense; and

17 (c) To the extent such property is not available for  
18 forfeiture, a sum of money equal to the total value of the property  
19 described in subparagraphs (a) and (b).

20 3. Pursuant to Title 21, United States Code, Section 853(p),  
21 as incorporated by Title 28, United States Code, Section 2461(c), any  
22 defendant so convicted shall forfeit substitute property, up to the  
23 value of the property described in the preceding paragraph if, as the  
24 result of any act or omission of said defendant, the property  
25 described in the preceding paragraph or any portion thereof

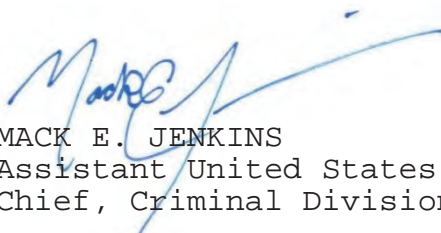
26 (a) cannot be located upon the exercise of due diligence; (b) has  
27 been transferred, sold to, or deposited with a third party; (c) has  
28 been placed beyond the jurisdiction of the court; (d) has been

1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

3  
4 A TRUE BILL

5  
6           /s/            
7 Foreperson

8 E. MARTIN ESTRADA  
9 United States Attorney

10   
11 MACK E. JENKINS  
12 Assistant United States Attorney  
13 Chief, Criminal Division

14 LINDSEY GREER DOTSON  
15 Assistant United States Attorney  
16 Chief, Public Corruption  
17 and Civil Rights Section

18 CASSIE D. PALMER  
19 Assistant United States Attorney  
20 Deputy Chief, Public Corruption  
21 and Civil Rights Section  
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