

Department of Law, Criminal Division
310 K Street Suite 601, Anchorage, AK 99501
Phone: (907) 269-6250 Fax: (907) 269-7939
Email: LawOSP@alaska.gov

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IN THE DISTRICT COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT BETHEL

STATE OF ALASKA,

Plaintiff,

vs.

SEUNG KYU JANG
DOB: 04/28/1971
APSIN ID: 7793784
DMV NO.: 7453275 AK
ATN: 114673311

JONATHAN CHA
DOB: 02/14/1954
APSIN ID: 8493874
DMV NO.: 7571120 AK
ATN: 114673302

SANG LEE
DOB: 01/13/1960
APSIN ID: 8667732
DMV NO.: 7607925 AK
ATN: 114673293

MYOUNG K LEE
DOB: 02/15/1954
APSIN ID: 8539159
DMV NO.: 7579762 AK
ATN: 114673284

IL KWON KIM
DOB: 03/01/1948
APSIN ID: 7647073
DMV NO.: 7403471 AK
ATN: 114673275

POK IM KIM
DOB: 07/07/1951
APSIN ID: 8503381
DMV NO.: 7573130 AK

FILED IN THE TRIAL COURTS
STATE OF ALASKA
BETHEL SERVICE AREA

SEP 07 2017

By _____
DEPUTY CLERK

SEP 07 2017

By _____
DEPUTY CLERK

1 ATN: 114673266
2 JOUNG AI LEE
3 DOB: 01/27/1955
4 APSIN ID: 7725331
5 DMV NO.: 7431104 AK
6 ATN: 114673257
7 SANG HO KIM
8 DOB: 12/10/1953
9 APSIN ID: 8223165
10 DMV NO.: 7511532 AK
11 ATN: 114673248
12 BONGSUN LEE
13 DOB: 09/30/1959
14 APSIN ID: 7638499
15 DMV NO.: 7399845 AK
16 ATN: 114673239
17 KYUNG SIN LEE
18 DOB: 02/07/1963
19 APSIN ID: 8650761
20 DMV NO.: 7603513
21 ATN: 114673509

Defendants.

22 No. 4BE-17- 637 CR (Seung Kyu Jang)
23 No. 4BE-17- 638 CR (Jonathan Cha)
24 No. 4BE-17- 639 CR (Sang Lee)
25 No. 4BE-17- 640 CR (Myoung K Lee)
26 No. 4BE-17- 641 CR (IL Kwon Kim)
27 No. 4BE-17- 642 CR (Pok Im Kim)
28 No. 4BE-17- 644 CR (Joung Ai Lee)
29 No. 4BE-17- 645 CR (Sang Ho Kim)
30 No. 4BE-17- 646 CR (Bongsun Lee)

Information
State v. Seung Kyu Jang,
Jonathan Cha,
Sang Lee,
Myoung K Lee,
IL Kwon Kim,
Pok Im Kim,
Joung Ai Lee,
Sang Ho Kim,
Bongsun Lee,
Kyung Sin Lee
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SEP 07 2017

1 No. 4BE-17- 647 CR (Kyung Sin Lee)

By _____
DEPUTY CLERK

2 INFORMATION

3 I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2)
4 residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a
5 crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court
6 The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: None

7 Count I - AS 04.11.010(a)(misdA)
8 Trafficking In Liquor Without A License In Local Option Area
9 Bongsun Lee - 001

10 Count II - AS 04.11.010(a)(misdA)
11 Trafficking In Liquor Without A License In Local Option Area
12 Sang Ho Kim- 001

13 Count III - AS 04.11.010(a)(misdA)
14 Trafficking In Liquor Without A License In Local Option Area
15 Bongsun Lee - 002

16 Count IV - AS 04.11.010(a)(misdA)
17 Trafficking In Liquor Without A License In Local Option Area
18 Sang Ho Kim - 002

19 Count V - AS 04.11.010(a)(misdA)
20 Trafficking In Liquor Without A License In Local Option Area
21 Sang Ho Kim - 003

22 Count VI - AS 04.11.010(a)(misdA)
23 Trafficking In Liquor Without A License In Local Option Area
24 Sang Ho Kim - 004

25 Count VII - AS 04.11.010(a)(misdA)
26 Trafficking In Liquor Without A License In Local Option Area
27 Joung Ai Lee - 001

Count VIII - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area

Information
State v. Seung Kyu Jang,
Jonathan Cha,
Sang Lee,
Myoung K Lee,
IL Kwon Kim,
Pok Im Kim,
Joung Ai Lee,
Sang Ho Kim,
Bongsun Lee,
Kyung Sin Lee
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Joung Ai Lee - 002

Count IX - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Pok Im Kim - 001

Count X - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Il Kwon Kim - 001
Myoung Lee - 001

Count XI - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Pok Im Kim - 002

Count XII - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Joung Ai Lee - 003

Count XIII - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Sang Yur Lee - 001

Count XIV - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Jonathan Cha - 001

Count XV - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Pok Im Kim - 003

Count XVI - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Joung Ai Lee - 004

Count XVII - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Jonathan Cha - 002

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Count XVIII - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Sang Yur Lee - 002

Count XIX - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Seung Jang - 001
Kyung Sin Lee - 001

Count XX - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Joung Ai Lee - 005

Count XXI - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Sang Yur Lee - 003

Count XXII - AS 04.11.010(a)(misdA)
Trafficking In Liquor Without A License In Local Option Area
Seung Jang - 002
Kyung Sin Lee - 002

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Trafficking In Liquor Without A License In Local Option Area
Jonathan Cha - 003

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THE OFFICE OF SPECIAL PROSECUTIONS CHARGES:

COUNT I

That in the Fourth Judicial District, State of Alaska, on or about December 29, 2015, at or near Bethel, BONGSUN LEE knowingly sold, offered for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

COUNT II

That in the Fourth Judicial District, State of Alaska, on or about February 2, 2016, at or near Bethel, SANG HO KIM knowingly sold, offered for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

COUNT III

That in the Fourth Judicial District, State of Alaska, on or about February 2, 2016, at or near Bethel, BONGSUN LEE knowingly sold, offered for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

COUNT IV

1 That in the Fourth Judicial District, State of Alaska, on or about February 3,
2 2016, at or near Bethel, SANG HO KIM knowingly sold, offered for sale, possessed for
3 sale or barter, or trafficked in, an alcoholic beverage without a license.

4 All of which is a Class A Misdemeanor offense being contrary to and in
5 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

6 **COUNT V**

7 That in the Fourth Judicial District, State of Alaska, on or about February 10,
8 2016, at or near Bethel, SANG HO KIM knowingly sold, offered for sale, possessed for
9 sale or barter, or trafficked in, an alcoholic beverage without a license.

10 All of which is a Class A Misdemeanor offense being contrary to and in
11 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

12 **COUNT VI**

13 That in the Fourth Judicial District, State of Alaska, on or about March 9, 2016,
14 at or near Bethel, SANG HO KIM knowingly sold, offered for sale, possessed for sale or
15 barter, or trafficked in, an alcoholic beverage without a license.

16 All of which is a Class A Misdemeanor offense being contrary to and in
17 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

18 **COUNT VII**

19 That in the Fourth Judicial District, State of Alaska, on or about March 9, 2016,
20 at or near Bethel, JOUNG AI LEE knowingly sold, offered for sale, possessed for sale or
21 barter, or trafficked in, an alcoholic beverage without a license.
22

1 All of which is a Class A Misdemeanor offense being contrary to and in
2 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

3
4 **COUNT VIII**

5 That in the Fourth Judicial District, State of Alaska, on or about March 16, 2016,
6 at or near Bethel, JOUNG AI LEE knowingly sold, offered for sale, possessed for sale or
7 barter, or trafficked in, an alcoholic beverage without a license.

8 All of which is a Class A Misdemeanor offense being contrary to and in
9 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

10 **COUNT IX**

11 That in the Fourth Judicial District, State of Alaska, on or about March 16,
12 2016, at or near Bethel, POK IM KIM knowingly sold, offered for sale, possessed for
13 sale or barter, or trafficked in, an alcoholic beverage without a license.

14 All of which is a Class A Misdemeanor offense being contrary to and in
15 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

16 **COUNT X**

17 That in the Fourth Judicial District, State of Alaska, on or about March 17,
18 2016, at or near Bethel, IL KWON KIM AND MYOUNG LEE knowingly sold, offered
19 for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a
20 license.

21 All of which is a Class A Misdemeanor offense being contrary to and in
22 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

COUNT XI

That in the Fourth Judicial District, State of Alaska, on or about March 17, 2017, at or near Bethel, POK IM KIM knowingly sold, offered for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

COUNT XII

That in the Fourth Judicial District, State of Alaska, on or about March 17, 2017, at or near Bethel, JOUNG AI LEE knowingly sold, offered for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

COUNT XIII

That in the Fourth Judicial District, State of Alaska, on or about March 30, 2016, at or near Bethel, SANG YUR LEE knowingly sold, offered for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

COUNT XIV

That in the Fourth Judicial District, State of Alaska, on or about March 30, 2016, at or near Bethel, JONATHAN CHA knowingly sold, offered for sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

1 All of which is a Class A Misdemeanor offense being contrary to and in
2 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

3
4 COUNT XV

5 That in the Fourth Judicial District, State of Alaska, on or about March 30, 2016,
6 at or near Bethel, POK IM KIM knowingly sold, offered for sale, possessed for sale or
7 barter, or trafficked in, an alcoholic beverage without a license.

8 All of which is a Class A Misdemeanor offense being contrary to and in
9 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

10
11 COUNT XVI

12 That in the Fourth Judicial District, State of Alaska, on or about March 30,
13 2016, at or near Bethel, JOUNG AI LEE knowingly sold, offered for sale, possessed for
14 sale or barter, or trafficked in, an alcoholic beverage without a license.

15 All of which is a Class A Misdemeanor offense being contrary to and in
16 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

17
18 COUNT XVII

19 That in the Fourth Judicial District, State of Alaska, on or about March 31,
20 2016, at or near Bethel, JONATHAN CHA knowingly sold, offered for sale, possessed
21 for sale or barter, or trafficked in, an alcoholic beverage without a license.

22 All of which is a Class A Misdemeanor offense being contrary to and in
23 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

24
25 COUNT XVIII

1 That in the Fourth Judicial District, State of Alaska, on or about MARCH 31,
2 2016, at or near Bethel, SANG YUR LEE knowingly sold, offered for sale, possessed for
3 sale or barter, or trafficked in, an alcoholic beverage without a license.

4 All of which is a Class A Misdemeanor offense being contrary to and in
5 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.
6

7 **COUNT XIX**

8 That in the Fourth Judicial District, State of Alaska, on or about March 31, 2016,
9 at or near Bethel, SEUNG JANG and KYUNG SIN LEE knowingly sold, offered for
10 sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

11 All of which is a Class A Misdemeanor offense being contrary to and in
12 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.
13

14 **COUNT XX**

15 That in the Fourth Judicial District, State of Alaska, on or about March 31,
16 2016, at or near Bethel, JOUNG AI LEE knowingly sold, offered for sale, possessed for
17 sale or barter, or trafficked in, an alcoholic beverage without a license.

18 All of which is a Class A Misdemeanor offense being contrary to and in
19 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.
20

21 **COUNT XXI**

22 That in the Fourth Judicial District, State of Alaska, on or about April 26, 2016,
23 at or near Bethel, SANG YUR LEE knowingly sold, offered for sale, possessed for sale
24 or barter, or trafficked in, an alcoholic beverage without a license.

1 All of which is a Class A Misdemeanor offense being contrary to and in
2 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

3
4 COUNT XXII

5 That in the Fourth Judicial District, State of Alaska, on or about April 27, 2016,
6 at or near Bethel, SEUNG JANG and KYUNG SIN LEE knowingly sold, offered for
7 sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

8 All of which is a Class A Misdemeanor offense being contrary to and in
9 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

10
11 COUNT XIII

12 That in the Fourth Judicial District, State of Alaska, on or about March 17, 2016,
13 at or near Bethel, IL KWON KIM AND MYOUNG LEE knowingly sold, offered for
14 sale, possessed for sale or barter, or trafficked in, an alcoholic beverage without a license.

15 All of which is a Class A Misdemeanor offense being contrary to and in
16 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

17
18 COUNT XIV

19 That in the Fourth Judicial District, State of Alaska, on or about March 30, 2016,
20 at or near Bethel, SANG YUR LEE knowingly sold, offered for sale, possessed for sale
21 or barter, or trafficked in, an alcoholic beverage without a license.

22 All of which is a Class A Misdemeanor offense being contrary to and in
23 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.

24
25 COUNT XV

1 That in the Fourth Judicial District, State of Alaska, on or about March 31, 2016,
2 at or near Bethel, JONATHAN CHA knowingly sold, offered for sale, possessed for sale
3 or barter, or trafficked in, an alcoholic beverage without a license.

4 All of which is a Class A Misdemeanor offense being contrary to and in
5 violation of AS 04.11.010 and against the peace and dignity of the State of Alaska.
6

7 The undersigned swears under oath this Information is based upon a review of
8 police report AK1501799 and associated audio files, photographs, documents, and search
9 warrant affidavits submitted to date.
10

11 **General Information**

12 For several years the Alaska State Troopers, Western Alaska Alcohol and
13 Narcotics Team (WAANT) has received tips stating that many Bethel cab drivers are
14 illegally selling alcohol out of their cabs.

15 WAANT investigators began an investigation by inspecting the written bush
16 order information that is reported to the Alcohol Beverage Control Board. In essence,
17 liquor stores around the state are required to report any sales of more than 36.5L of liquor
18 that are purchased through the bush written order process.

19 WAANT compared information regarding large alcohol purchasers in Bethel
20 with a list of taxi cab drivers obtained through the City of Bethel Taxi Database.
21 Through this comparison the WAANT investigators could see that many taxi cab drivers
22 had a history of unusually large alcohol purchases in the last year. Several drivers
23 purchased more than 100L of liquor in the year 2015.
24

25 Information
State v. Seung Kyu Jang,
Jonathan Cha,
Sang Lee,
26 *Myoung K Lee,*
IL Kwon Kim,
Pok Im Kim,
27 *Joung Ai Lee,*
Sang Ho Kim,
Bongsun Lee,
Kyung Sin Lee
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1 In December of 2015, WAANT began an undercover operation using three
2 undercover officers (UC's) to purchase alcohol from cab drivers. Over several months
3 the undercover officers purchased alcohol from drivers working for several major Bethel
4 cab companies: Taxi Cab, Alaska Cab, Quyana Cab, and Kusko Cab. This particular
5 charging document only charges drivers from the Alaska and Taxi Cab companies.

6 Taxi Cab is a sole proprietorship owned by Chris Son. Alaska Cab is a sole
7 proprietorship owned by Il Kwon Kim. They are registered as separate companies.
8 However, an undercover officer posing as an employee of the Department of Commerce,
9 Community and Economic Development spoke with the owners of both companies and
10 learned that they share a single dispatch system and a single office in Trailer #41. In
11 addition, investigation revealed that multiple people live in Trailer #41, including
12 Jonathan Sungjoo Cha, who sold alcohol to the UC officers. The written order database
13 also shows that Cha ordered 188.25 liters of liquor in 2015. However, in a conversation
14 with a UC officer Cha stated that "the guy" in trailer #41 keeps a ledger tracking alcohol
15 sales and that "the guy" in trailer #41 keeps most of the money from the alcohol sales.
16 Cha also told the UC that the company would continue to sell alcohol after the liquor
17 store opened, but that they would mainly sell alcohol after hours once the store was open.

18 In total the UC officers purchased alcohol from Alaska/Taxi Cab drivers on
19 twenty-five separate occasions. In each instance, the UC's purchased alcohol from an on-
20 duty driver. Additionally, in each instance the drivers sold the UC's one or two 750ml
21 bottles of R&R for \$50 per bottle.

22 After each purchase the UC gave the WAANT investigators the purchased bottle
23 of alcohol and then did a debrief about the sale. The UC was also shown a photo lineup
24 containing six photographs, one of which was a photo of the suspected driver or other

1 involved persons. After the UC confirmed the identity of the driver, WAANT petitioned
2 the Court for Glass Warrants to record additional alcohol purchases from the agents.

3 At the time of the alleged sales, neither Taxi Cab, Alaska Taxi, nor the
4 individual drivers named in this information possessed a valid license to sell alcohol in
5 Bethel.

6 **Specific UC Purchases**

7 *(1) 12/29/15 purchase from Bongsun Lee, Taxi Cab #72*

8 On 12/29/2015, TAM1-15-12 and TAM1-15-13 entered cab #72. They
9 requested a bottle of alcohol from the driver (later identified as Bongsun Lee). Lee
10 agreed to sell the UC's a bottle of R&R for \$50. Lee drove them to trailer #15 where she
11 went inside with \$50 that Tam1-15-12 had given her. Lee returned a few moments later
12 with a bottle of R&R which she gave to the UC. The UC's were dropped off and
13 required to pay a \$10 cab fare. Both UC's described these facts during a debrief with
14 Inv. Moehring, and they both identified Lee through separate photo lineups.

15 The ABC Board revealed LEE ordered 176.5 liters of liquor in 2015, and 178
16 liters through June of 2016

17 *(2) 2/2/16 purchase from Sang Ho Kim, Taxi Cab #89*

18 On 2/2/16 the on-duty manager for Tundra Suites called a cab for TAM1-15-12.
19 Tam 1-15-12 entered cab #89 and asked the driver (later identified as Sang Ho Kim) if
20 he/she could buy a bottle of alcohol. The driver told TAM1-15-12 that it would cost \$50.
21 TAM1-15-12 paid \$50. Kim then provided the driver with a bottle of R&R, which Kim
22 kept inside the car. Kim dropped off the driver and required \$10 for the cab fare.
23

24 Information
25 *State v. Seung Kyu Jang,*
Jonathan Cha,
Sang Lee,
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IL Kwon Kim,
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27 *Joung Ai Lee,*
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Bongsun Lee,
Kyung Sin Lee
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1 TAM1-15-12 described these events in a debrief with Inv. Moehring. TAM1-15-12 also
2 identified Kim through a photo lineup.

3 A check of the ABC Board bush order service database showed that Kim
4 purchased 426 liters of liquor in 2015 and 318 liters of liquor through June of 2016.

5 (3) *2/2/16 Purchase from Bongsun Lee, Taxi Cab #72*

6 On 2/2/16 at approximately 2304 hours Inv. Moehring dropped TAM1-15-13 off
7 at the AC QuickStop where TAM1-15-13 entered Alaska Cab #72. The cab drove to
8 trailer #15, and parked outside. A few minutes later the cab left the area. At 2323 Inv.
9 Moehring picked up TAM1-15-13, and conducted a debrief. TAM1-15-13 provided a
10 bottle of R&R. TAM1-15-13 stated that he/she got into cab #72 operated by LEE.
11 TAM1-15-13 remembered LEE from the prior purchase. TAM1-15-13 asked to get a
12 bottle. LEE initially said no. But after TAM1-15-13 persisted, LEE stated a bottle would
13 cost \$60. LEE drove to trailer #15 where she parked outside. An older Korean male
14 came outside and handed LEE a bottle of R&R. LEE sold the bottle to TAM1-15-13 for
15 \$60.

16 (4) *2/3/2016 purchased from Sang Ho Kim, Alaska Cab #89*

17 On 2/3/2016 at approximately 1629 hours TAM1-15-12 called SANG HO KIM,
18 whose personal number he/she had obtained during a prior alcohol purchase, asking to be
19 picked up from the AC store. KIM told him to wait at the handy cap area of the AC
20 store. TAM1-15-12 asked KIM if he could buy another one. KIM said that he could and
21 drove the UC to the Ptarmigan quick stop store. KIM handed the UC a bottle of R&R,
22 and the UC paid \$50 for it. TAM1-15-12 asked KIM if he could give KIM's number to
23

1 other people who wanted to buy alcohol, and KIM said that this was OK. Afterwards,
2 TAM1-15-12 described these events with Inv. Evan in a recorded debrief.

3
4 (5) *2/10/2016: Sang Ho Kim, Taxi Cab #89*

5 On 2/10/16 at 1941 hours TAM1-15-12 called SANG HO KIM asking to buy
6 alcohol. KIM picked up TAM1-15-12 in taxi #89. Inv. Evan followed as KIM drove the
7 UC to the Long house and dropped him/her off. TAM1-15-12 showed Inv. Evan a bottle
8 of R&R which TAM1-15-12 purchased from KIM for \$50 plus \$5 for the cab fare.
9 TAM1-15-12 explained that KIM already had the alcohol in his car. TAM1-15-12 also
10 stated that he/she recognized KIM from prior purchases.

11 (6) *3/9/16 Purchase from Sang Ho Kim, Taxi Cab #89*

12 On 3/9/16 Inv. Evan watched as TAM1-16-01 entered cab #89 outside the VFW
13 building. Inv. Evan followed as the cab drove around town, eventually dropping off
14 TAM1-16-01 at the AC Store. Inv. Evan picked up the UC and took him/her to the
15 trooper post. TAM1-16-01 was debriefed by Inv. Moehring. TAM1-16-01 described
16 that the driver said his name was Sam. TAM1-15-12 had also previously reported that
17 KIM called himself "Sam." TAM1-16-01 stated that "Sam" sold him a bottle of R&R for
18 \$50 in the car and that the cab ride was \$5. TAM1-16-01 identified KIM in a photo
19 lineup.

20 (7) *3/9/16 Purchase from Joung Ai Lee, Alaska Cab #93*

21 On 3/9/17 at 2330 hours, TAM1-16-01 was dropped off at the hospital where
22 he/she called Alaska Cab to arrange for a ride with cab #92. Instead, cab #93 arrived.
23 The cab drove around town before dropping TAM1-16-01 off at the Allnavik Hotel. Inv.

1 Moehring picked TAM1-16-01 at the hotel. TAM1-16-01 described that the driver
2 identified herself as "Lynn." TAM1-16-01 asked for a bottle of alcohol. "Lynn" stated
3 that it would cost \$50. "Lynn" drove to Alder Street where she parked. She went up a
4 set of stairs and came back with a bottle of alcohol which she sold to TAM1-16-01.

5 "Lynn" gave TAM1-16-01 her number in case he wanted to buy more alcohol.

6 "Lynn" was later identified as Joung Ai Lee through a photo lineup.

7 (8) *3/16/16 Purchase from Joung Ai Lee, Alaska Cab #93*

8 On 3/16/16 at 2112 hours, TAM1-15-12 entered cab #93 parked in front of the
9 AC Quick Stop. At 2118 he/she was dropped back off at the Quick Stop. Inv. Moehring
10 debriefed the UC. He/she stated that LEE sold him/her a bottle of R&R for \$50. LEE
11 told TAM1-15-12 that he could call her number if he wanted more alcohol. TAM1-15-12
12 identified LEE through a photo lineup.

13 (9) *3/16/16 Purchase from Pok Im Kim, Alaska Cab #92*

14 Inv. Moehring had previously received a tip that POK IM KIM sold alcohol
15 while driving Cab #92. The tip stated that KIM does not keep alcohol in the cab, but
16 retrieves it from 410 6th Ave. in Bethel.

17 On 3/16/17 Inv. Moehring dropped TAM1-15-12 off at VFW and instructed
18 him/her to get in Alaska Cab #92 and attempt to purchase alcohol. Inv. Moehring
19 watched as TAM1-15-12 got into the cab. Inv. Moehring recognized POK IM KIM as
20 the driver.

21 At the conclusion of the cab ride, Inv. Moehring debriefed TAM1-15-12.
22 TAM1-15-12 stated that KIM sold him/her a bottle of R&R for \$50. KIM called herself
23

1 "Candy" and gave TAM1-15-12 her number in case he wanted to buy more alcohol.
2 TAM1-15-12 identified KIM through a photo lineup.

3
4 *(10) 3/17/16 Purchase from Il Kwon Kim and Myoung Kuen Lee, Alaska Cab #102
and Taxi Cab #86*

5 On 3/17/16 at 1715 hours Inv. Moehring dropped TAM1-15-13 off at YKHC.
6 One minute later the UC got into cab #102. The cab drove to the Long House. TAM1-
7 15-12 exited the cab and then entered cab #86, which had just arrived. Then TAM1-15-
8 13 got out of cab #86 and both cabs departed the area.

9 Inv. Moehring debriefed TAM1-15-13. He/she said that he/she asked the first
10 driver (later identified through a photo lineup as IL KWON KIM) how to get alcohol.
11 KIM made a phone call. TAM1-15-13 could see the screen of the phone and could see
12 that the call was made to MYOUNG LEE. KIM then drove to the Long House where
13 they met with LEE in cab #86. TAM1-15-12 paid LEE \$50 for a bottle of R&R.
14 TAM1-15-12 identified both drivers through a photo lineup.

15 IL KWON KIM is the owner of Alaska Taxi. KIM and LEE repeated this same
16 scheme for selling alcohol a few hours later when TAM1-15-12 asked KIM for alcohol.
17 This is described in count 23 (see below).

18
19 *(11) 3/17/17 Purchase from Pok Im Kim, Alaska Cab #92*

20 On 3/17/17 at 2149 hours, TAM1-15-12 called POK IM KIM at the number she
21 provided during the 3/16/16 buy. TAM1-15-12 was picked up at 2156 hours by Alaska
22 Cab #92 at the Lions Club and dropped off at 2202 hours at the Ptarmigan QuickStop.
23 During a debrief TAM1-15-12 explained the information below.

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1 TAM1-15-12 called KIM on the number she provided to TAM1-16-01, asking
2 for a ride. KIM arrived. TAM1-15-12 asked for a bottle of alcohol. KIM pulled a bottle
3 from the front driver's area of the cab. She then handed the bottle to TAM1-15-12.
4 TAM1-15-12 provided her \$50 in prerecorded buy funds for the bottle of alcohol.
5 TAM1-15-12 was dropped off, requiring \$5 for the cab fare. TAM1-15-12 identified
6 KIM through a photo lineup as the driver of cab #92, and the one who sold them the
7 alcohol.

8 The ABC Board database indicates that KIM ordered 307.5L of liquor between
9 January 1, 2016 and June 1, 2016.

10 *(12) 3/17/16 Purchase from Joung Ai Lee, Alaska Cab #93*

11 On 3/17/16 at 2245 hours TAM1-15-13 was picked up from YKHC in Alaska
12 Taxi #93. TAM1-15-13 was dropped off at the Long House Hotel at 2256 hours. During
13 a debrief TAM1-15-13 explained that he/she entered cab #93 and requested a bottle of
14 alcohol. LEE arranged the sale. LEE told TAM1-15-13 that her name was "Joann".
15 LEE drove to 271 Alder St where she parked by unit B or C. LEE met a Korean male
16 from 271A. The male handed her a bottle of alcohol after she provided the male money.
17 LEE returned to the cab, and gave the bottle of alcohol to TAM1-15-13. TAM1-15-13
18 then provided LEE with \$50 in prerecorded buy funds, as well as \$5 for the cab ride.
19 TAM1-15-13 was dropped off. TAM1-15-13 identified LEE through a photo lineup.
20 TAM1-15-13 was later driven to the location where he/she confirmed 271A was the sales
21 location.

22 *(13) 3/30/16 Purchase from Sang Yur Lee, Alaska Cab #104*

1 TAM1-15-12 called Alaska/Taxi Cab dispatch for a ride. A few minutes later
2 cab #104 showed up. TAM1-15-12 asked for a bottle of alcohol. LEE pulled a bottle of
3 alcohol from inside his jacket, which he then handed to TAM1-15-12. TAM1-15-12 then
4 provided LEE with \$50 in prerecorded buy funds. TAM1-15-12 was able to see a cab
5 permit on the dash board with the name Sang Yur Lee printed on it. LEE also provided
6 TAM1-15-12 with a piece of paper containing the name "Lee" and a phone number. LEE
7 told TAM1-15-12 to call if he/she needed more alcohol. TAM1-15-12 was then dropped
8 off requiring \$5 for the cab fare. TAM1-15-12 identified LEE through a photo lineup.

9 *(14) 3/30/16 Purchase from Jonathan SungJoon Cha, Alaska Cab #90*

10 On 30/30/16 at approximately 2148 hours TAM1-16-01 entered cab #90 from
11 the AC Store. The cab drove to Q2, then to trailer #41, the business headquarters for
12 Alaska and Taxi Cab. The cab then drove to the longhouse where TAM1-16-1 was
13 dropped off.

14 Inv. Moehring debriefed the UC. He/she stated that he/she entered the cab and
15 asked for a bottle of alcohol. The driver then asked for \$50, which TAM1-16-1 provided.
16 The driver drove to trailer #41. The driver came out with a bottle of alcohol, which was
17 sold for \$50. The driver identified himself as "Jay Jay." Additional information revealed
18 that JONATHAN CHA is the registered owner of cab #90 and that he lists his address as
19 trailer #41. However, TAM1-16-01 was not able to identify CHA as the driver.
20 However, the next day TAM1-15-12 purchased alcohol from the same cab and did
21 identify CHA through a photo lineup.

22 *(15) 3/30/16: Pok Im Kim, Alaska Cab #92*

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1 On 3/30/16 at 2231 hours, TAM1-15-12 called POK IM KIM on the number she
2 had provided. KIM did not initially pick up initially, but she called TAM1-15-12 back.
3 He/she asked for a ride. KIM picked up TAM1-15-12 at the Long House. She was
4 driving cab #92. Inv. Moehring followed as KIM drove around town, eventually
5 dropping TAM1-15-12 off at the Long House. Inv. Moehring debriefed TAM1-15-12.
6 TAM1-15-12 described that when he/she got in the cab KIM asked if he/she wanted a
7 bottle. KIM then sold TAM1-15-12 a bottle of R&R for \$50. TAM1-15-12 also paid
8 \$10 for the cab ride. TAM1-15-12 stated that he/she recognized KIM from a prior cab
9 ride.

10 *(16) 3/30/16 Purchase from Joung Ai Lee, Alaska Cab #93*

11 On 3/30/16 at approximately midnight, Inv. Moehring debriefed TAM1-16-1
12 regarding a purchase he/she had made earlier in the night. TAM1-16-01 stated that
13 he/she called "Lynn" of cab #93 for a ride. TAM1-16-1 had previously purchased alcohol
14 from "Lynn" on 3/9/2016. Once in the cab, TAM1-16-01 recognized the driver from
15 their previous alcohol buy. TAM1-16-01 asked for a bottle of alcohol. TAM1-16-01
16 provided Lynn with \$50 in prerecorded buy funds. Lynn then pulled a bottle of alcohol
17 from under the driver's seat. Lynn provided TAM1-16-01 the bottle of alcohol. TAM1-
18 16-01 was then dropped off, requiring \$5 in cab fare.

19 TAM1-16-01 was not able to identify the driver through a photo lineup.
20 However, another UC had previously identified LEE as the driver of #93 who sold
21 alcohol. In addition, through physical surveillance, Inv. Moehring has observed that LEE
22 is the nighttime driver of cab #93, while Wan Jae Hwang is the daytime driver of cab
23 #93. Further, the ABC board revealed that LEE ordered 120 liters of liquor between
24 January 1 and June 1 of 2016.

1
2 (17) 3/31/16: Purchase from Jonathan SungJoon Cha, Alaska Cab #90

3 At 2039 hours TAM1-16-01 was dropped off at the AC Store. He/she was
4 picked up by cab #90. Inv. Moehring followed the cab. The cab dropped TAM1-16-01
5 off at the Q2 store near the trailer court. The cab then drove to trailer #41. At 2046 hours
6 the cab returned to Q2 and TAM1-16-01 entered the cab. The cab then dropped TAM1-
7 16-01 off at the hospital.

8 TAM-1-16-01 stated that the driver called himself "Jay Jae." The UC asked for
9 alcohol. The driver drove to the Q2 store, dropped off the UC, and stated that he would
10 be right back. The driver returned with a bottle of R&R, which he sold to the UC for
11 \$50. The driver also provided TAM1-16-01 with a personal number to call for future
12 rides. TAM1-16-01 also paid \$5 for the cab ride. TAM1-16-01 was unable to identify the
13 driver in a photo lineup. However, a different UC made a purchase from the same cab
14 about two hours later, and did identify the driver as JONATHAN CHA (see COUNT 25
15 below). CHA had also been identified as a seller of alcohol in cab #90 one day earlier
16 (see COUNT 14 above).

17 (18) 3/31/16 Purchase from Sang Yur Lee, Alaska Cab #104

18 On 3/31/16 at approximately 1636 hours, Inv. Evan watched as TAM1-15-12
19 was picked up outside the AC Store by cab #104, then dropped off at the Alanavik Hotel.
20 Inv. Moehring debriefed the UC. He/she stated that he/she asked for a bottle of alcohol.
21 LEE pulled a bottle of alcohol from inside his jacket, which he then handed to TAM1-15-
22 12. TAM1-15-12 then provided LEE with \$50. TAM1-15-12 was dropped off. LEE did
23 not require a cab fare from TAM1-15-12. TAM1-15-12 recognized LEE from the
24 previous purchase, and LEE seemed to recognize TAM1-15-12.

1
2 (19) 3/31/16 Purchase from Seung Kyu Jang and Kyung Sin Lee, Taxi Cab #88

3 On 3/31/16 TAM1-15-12 was dropped off at the Long House. Inv. Moehring
4 watched as Cab #88 picked him/her up at 1837 hours. The cab dropped TAM1-15-12 off
5 at the AC Quick Stop. Inv. Evan picked him up. Inv. Moehring debriefed TAM1-15-12.

6 TAM1-15-12 stated that he/she called Alaska/Taxi Cab dispatch for a ride. Cab
7 #88 came and picked him/her up. TAM1-15-12 identified the driver as SEUNG JANG
8 through a photo lineup. TAM1-15-12 also said that there was a female passenger. The
9 passenger was later identified as KYUNG SIN LEE.

10 TAM1-15-12 stated that he/she asked for alcohol. The female pulled a bottle of
11 R&R from her seat and sold it to the UC for \$50. TAM1-15-12 asked for a number to
12 call to buy alcohol in the future, however the driver told him just to call dispatch.

13 ABC Board records show that JANG ordered 186 liters of liquor in 2016.
14 KYUNG SIN LEE ordered 101 liters of liquor through June of 2016.

15 At the time of the sale and debrief neither the UC nor the WAANT investigators
16 knew who the female passenger (LEE) was and thus could not engage the UC in a photo
17 lineup. Inv. Moehring contacted a transportation official at the City of Bethel and learned
18 that there is a woman who is always with JANG for any inspection or taxi related
19 business. However, the official did not know the woman's name. Inv. Moehring began
20 watching cab #88 and eventually identified the woman as LEE.

21 Then on 4/26/16, TAM1-16-01 entered cab #88. TAM1-16-01 was told that the
22 cab was out of alcohol. However, TAM1-16-01 was able to note that there was a female
23 passenger (which is consistent with what Inv. Moehring had observed by watching the
24 cab over the prior weeks). TAM1-16-01 identified the female as LEE through a photo
25 lineup.

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1
2 (20) 3/31/16 Purchase from Joung Ai Lee, Alaska Cab #93

3 On 3/31/16 at approximately 2235 hours TAM1-16-01 was dropped off at the
4 AC Store. He/she was directed to call "Lynn" for a pickup. At 2243 hours Inv.
5 Moehring watched as cab #93 arrived. TAM1-16-01 entered the cab and the cab drove to
6 the Alanavik Hotel where TAM1-16-01 was dropped off. Inv. Evan picked him up.

7 Inv. Moehring debriefed the UC. The UC stated that he/she called "Lynn" for a
8 ride. "Lynn" arrived and there was a female in the passenger seat. The UC gestured that
9 he/she wanted a bottle of alcohol. "Lynn" then pulled a bottle of R&R out from under
10 the seat and sold it to TAM1-16-01 for \$50. "Lynn" said that the drivers would continue
11 to sell alcohol after the liquor store opened.

12 TAM1-16-01 could not identify "Lynn" in a photo lineup. However, JOUNG AI
13 LEE had been identified as the driver of cab #93 through photo lineups after multiple
14 other buys. In addition, LEE had used the name "Lynn" while driving cab #93 during
15 those other buys.

16 (21) 4/26/17 Purchase from Sang Yur Lee, Alaska Cab #104

17 On 4/26/17, Inv. Moehring watched as TAM1-16-01 got into cab #88 at the AC
18 Store. TAM1-16-01 immediately got out of cab #88 and got into cab #104. The cab then
19 drove to the Kusko Inn. In a debrief, TAM1-16-01 explained that the driver of cab#88
20 said that he was out of alcohol and that cab #104 would have alcohol. TAM1-16-01 then
21 got into cab #104. The driver sold him a bottle of R&R for \$50. The driver gave TAM1-
22 16-01 a business card identifying himself as SANG YUR LEE.

23 TAM1-16-01 identified the female passenger of cab #88 as KYUNG SIN LEE
24 through a photo lineup.

1
2 (22) 4/27/16: *Seung Kyu Jang and Kyung Sin Lee, Taxi Cab #88*

3 On 4/27/16 at 2034 hours, TAM1-16-01 entered cab #88 from the AC Store.
4 Inv. Moehring followed as the cab drove to the trailer park and parked on the side of
5 Ravn Road, near the backside of trailer #79. The cab then went to the Kusko Inn where
6 TAM1-16-01 was dropped off.

7 Inv. Moehring debriefed TAM1-16-01. He/she said that the driver and
8 passenger were the same people that were in cab #88 the previous day. The female
9 passenger recognized him/her and called him/her by name. TAM1-16-01 asked for
10 alcohol. The passenger told the UC to pay \$50 which he/she did. The cab then drove to
11 Ravn Road. The driver got out and came back with a bottle of R&R which he gave to the
12 UC.

13 TAM1-16-01 identified the driver as SEUNG KYU JANG and the passenger as
14 KYUNG SIN LEE through a photo lineup.

15 (23) 3/17/16 *Purchase from Il Kwon Kim and Myoung Kuen Lee, Alaska Cab #102*
16 *and Taxi Cab #86*

17 On 3/17/16 at approximately 1753 hours TAM1-15-12 entered cab #102 from
18 the AC Store. Inv. Moehring watched as the cab drove to Yute Air. TAM1-15-12 exited
19 the cab and entered the terminal. A few minutes later he/she reentered the cab. The cab
20 drove back to Bethel. Then cab #102 and #86 pulled up next to each other along the
21 roadway on the TWC parking lot. TAM1-15-12 exited cab #102 and entered cab #86.
22 Cab #86 then drove to the Long House where it dropped off TAM1-15-12.

23 Inv. Evan picked up TAM1-15-12. He/she was debriefed and stated that he/she
24 asked the driver of #102 for alcohol. The driver said he would call someone. The driver

1 sent TAM1-15-12 inside while the call was made. The driver then took TAM1-15-12 to
2 cab #86 in order to purchase alcohol. The driver of #86 sold him/her a bottle of R&R for
3 \$50. Through photo lineups, TAM1-15-12 identified both IL KWON KIM and
4 MYOUNG LEE as the drivers of cabs #102 and #86 respectively. IL KWON KIM is the
5 owner of Alaska Cab.

6 (24) *3/30 Purchase from Sang Yur Lee, Alaska Cab #104*

7 On 30/30/16 at approximately 1928 hours Inv. Moehring watched TAM1-16-01
8 enter cab #104 from the AC Store. Inv. Moehring and Inv. Evan followed the cab. A
9 few minutes later the cab dropped TAM1-16-01 off at the Long House. Inv. Evan picked
10 up him/her up.

11 During a debrief, TAM1-16-01 explained that he/she asked the driver (later
12 identified as SANG YUR LEE for a bottle of alcohol. LEE had a bottle of R&R in his
13 car. He sold it to the UC for \$50. LEE also gave TAM1-16-01 a business card with his
14 name on it. TAM1-16-01 paid \$5 for the cab fare when he/she exited the vehicle.

15 TAM1-16-01 identified LEE as the driver through a photo lineup.

16 (25) *3/31/16 Purchase from Jonathan SungJoon Cha, Alaska Cab #90*

17 On 3/31/16 at 22014 hours, TAM1-15-12 called the driver of cab #90 using the
18 number that the driver had previously provided to TAM1-16-01. The driver picked
19 TAM1-15-12 up from the bingo hall. TAM1-15-12 got in the cab and Inv. Moehring
20 followed as it went directly to trailer #41. The driver went into the trailer, then returned to
21 the cab. The cab then drove to the Long House where TAM1-15-12 was dropped off.

22 Inv. Moehring debriefed TAM1-15-12. He/she described that the driver agreed
23 to sell a bottle of R&R. The driver drove to trailer #41, went inside, and came back with

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1 a bottle of R&R. TAM1-15-12 paid \$50 for the bottle. The driver told TAM1-15-12 that
2 "the guy" in trailer #41 keeps a ledger of alcohol sales and that "the guy" keeps most of
3 the money from the alcohol that is sold. The driver also stated that the company would
4 continue to sell alcohol after the liquor store opened, but that they would mainly sell
5 alcohol after hours once the store was open. TAM1-15-12 identified CHA as the driver
6 through a photo lineup.

7 **Additional Information from Search Warrants**

8 In June, 2016, AST served search warrants on several residences that had been
9 used as stash houses during this investigation. The troopers seized significant quantities
10 of alcohol and cash during these searches. The information below highlights a small
11 selection of what the troopers found.

12 Inside Trailer #79 troopers found forty-two 750ml bottles of liquor and \$46,000
13 cash inside a purse. Inside 217 Alder St., Unit B, the troopers found fifty-one 750ml
14 bottles of liquor. Inside Trailer #83 the troopers found approximately \$9,000 in cash.

16 **List of Search Warrants Related to this Investigation**

17 *Glass Warrants*

18 3AN-15-3088SW

19 3AN-15-3089SW

20 3AN-15-3090SW

21 3AN-16-314SW

22 3AN-16-314SW

23 3AN-15-534SW

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Department of Law, Criminal Division

310 K Street Suite 601, Anchorage, AK 99501

Phone: (907) 269-6250 Fax: (907) 269-7939

Email: LawOSP@alaska.gov

- 1 4BE-16-07SW
- 2 4BE-16-09SW
- 3 4BE-16-11SW
- 4 4BE-16-13SW
- 4 4BE-16-14SW
- 5 4BE-16-15SW
- 6 4BE-16-16SW
- 7 4BE-16-27SW
- 8 4BE-16-27SW
- 9 4BE-16-36SW
- 10 4BE-16-37SW
- 11 4BE-16-43SW
- 12 4BE-16-44SW
- 13 4BE-16-45SW
- 14 4BE-16-46SW
- 15 4BE-16-60SW
- 16 4BE-16-61SW
- 17 4BE-16-65SW
- 18 4BE-16-66SW
- 19 4BE-16-67SW

20 *Warrants for Vehicles and Locations*

- 21 3AN-16-1529SW
- 22 3AN-16-1530SW
- 23 3AN-16-1531SW

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- 1 3AN-16-1532SW
- 2 3AN-16-1533SW
- 3 3AN-16-1534SW
- 4 3AN-16-1535SW
- 5 3AN-16-1536SW
- 6 3AN-16-1537SW
- 7 3AN-16-1538SW
- 8 3AN-16-1539SW
- 9 3AN-16-1540SW
- 10 3AN-16-1541SW
- 11 3AN-16-1542 SW
- 12 3AN-16-1543 SW
- 13 3AN-16-1544 SW
- 14 3AN-16-1545 SW
- 15 3AN-16-1546 SW
- 16 3AN-16-1580SW
- 17 4BE-16-88SW

BAIL INFORMATION


APSIN does not list any prior convictions for the named defendants. The State is requesting a summons in this case. The State will request that all defendants who appear at arraignment be released on their own recognizance. In addition to standard bail conditions, the State will request conditions not to consume or possess alcohol and to submit to a portable breath test upon probable cause.

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Dated at Anchorage, Alaska, this 6th day of September, 2017.

JAHNA LINDEMUTH
ATTORNEY GENERAL

By: 

John H. Haley
Assistant Attorney General
Alaska Bar No. 1402010