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FILED

AUG 10 2017

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ 63
DEPUTY CLERK

6 Attorneys for Plaintiff
United States of America
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,

CASE NO. 2:17 - CR - - 136 KJM

13 v.

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to
Manufacture Marijuana; 21 U.S.C. § 841(a)(1) –
Manufacture of Marijuana (9 Counts); 18 U.S.C. §
1956 – Conspiracy to Launder Money; 18 U.S.C. §
1956 – Money Laundering (3 Counts); 21 U.S.C. §
853(a) – Criminal Forfeiture

14 XIU PING LI,
GUI WEN PAN,
15 XIU RU LI,
DAO ZHONG WEI,
YONG JIE LIU,
16 YOU AN LI,
SHUI PING ZHENG,
17 KONG LIANG LI,
GUANGZHAO LI, and
18 HUANG CHEN,

19 Defendants.
20

21 INDICTMENT

22 COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture Marijuana]

23 The Grand Jury charges: T H A T
24

25 XIU PING LI,
GUI WEN PAN,
26 XIU RU LI,
DAO ZHONG WEI,
YONG JIE LIU,
27 YOU AN LI,
SHUI PING ZHENG,
28 KONG LIANG LI,

1 GUANGZHAO LI, AND
2 HUANG CHEN,

3 defendants herein, between on or about January 14, 2016, and continuing through on or about July 26,
4 2017, in the Counties of Sacramento and Placer, State and Eastern District of California, did knowingly
5 and intentionally conspire and agree with each other and persons known and unknown to the Grand Jury
6 to manufacture marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States
7 Code, Sections 846 and 841(a)(1).

8 As to defendants XIU PING LI, and YOU AN LI, the conspiracy involved at least 1,000
9 marijuana plants.

10 As to defendants XIU RU LI, GUI WEN PAN, YONG JIE LIU, DAO ZHONG WEI, SHUI
11 ZHENG, GUANG ZHAO LI, KONG LIANG LI, and HUANG CHEN, the conspiracy involved at least
12 100 marijuana plants.

13 COUNT TWO: [21 U.S.C. §841(a)(1) – Manufacture of Marijuana]

14 The Grand Jury further charges: T H A T

15 XIU PING LI,
16 XIU RU LI, and
17 DAO ZHONG WEI,

18 defendants herein, between on or about February 22, 2016, and continuing through on or about July 26,
19 2017, at 7810 Elsie Avenue, in the County of Sacramento, State and Eastern District of California, did
20 knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I Controlled
21 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

22 COUNT THREE: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]

23 The Grand Jury further charges: T H A T

24 XIU PING LI
25 YONG JIE LIU, and
26 HUANG CHEN

27 defendants herein, between on or about October 19, 2016, and continuing through on or about July 26,
28 2017, at 8638 Bradshaw Road in the County of Sacramento, State and Eastern District of California, did

1 knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I Controlled
2 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

3 COUNT FOUR: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]
4

5 The Grand Jury further charges: T H A T

6 YOU AN LI and
7 SHUI ZHENG,

8 defendants herein, between on or about August 29, 2016, and continuing through on or about July 26,
9 2017, at 2860 Central Avenue, Roseville, in the County of Placer, State and Eastern District of
10 California, did knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I
11 Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

12 COUNT FIVE: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]
13

14 The Grand Jury further charges: T H A T

15 YOU AN LI, and
16 SHUI ZHENG,

17 defendants herein, between on or about January 13, 2017, and continuing through on or about July 26,
18 2017, at 10315 Baseline Road, Elverta, in the County of Placer, State and Eastern District of California,
19 did knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I Controlled
20 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 COUNT SIX: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]
22

23 The Grand Jury further charges: T H A T

24 XIU RU LI,

25 defendant herein, between on or about March 22, 2017, and continuing through on or about July 26,
26 2017, at 8967 Sonoma Valley Way, in the County of Sacramento, State and Eastern District of
27 California, did knowingly and intentionally manufacture, at least 100 marijuana plants, a Schedule I
28 Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

1 COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]

2 The Grand Jury further charges: T H A T

3 GUI WEN PAN,

4 defendant herein, between on or about February 16, 2017, and continuing through on or about July 26,
5 2017, at 4849 Ammolite Way, Elk Grove, in the County of Sacramento, State and Eastern District of
6 California, did knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I
7 Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).
8

9 COUNT EIGHT: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]

10 The Grand Jury further charges: T H A T

11 XIU PING LI,
12 DAO ZHONG WEI, and
13 GUANGZHAO LI,

14 defendants herein, between on or about April 4, 2017, and continuing through on or about July 26, 2017,
15 at 8114 Suarez Way, Elk Grove, in the County of Sacramento, State and Eastern District of California,
16 did knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I Controlled
17 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

18 COUNT NINE: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]

19 The Grand Jury further charges: T H A T

20 YOU AN LI, and
21 KONG LIANG LI,

22 defendants herein, between on or about September 15, 2016, and continuing through on or about July
23 26, 2017, at 3433 La Cadena Way, in the County of Sacramento, State and Eastern District of California,
24 did knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I Controlled
25 Substance, in violation of Title 21, United States Code, Section 841(a)(1).
26

27 COUNT TEN: [21 U.S.C. § 841(a)(1) – Manufacture of Marijuana]

28 The Grand Jury further charges: T H A T

1
2 GUI WEN PAN, and
DAO ZHONG WEI,

3 defendants herein, between on or about January 23, 2017, and continuing through on or about July 26,
4 2017, at 2725 52d Avenue, in the County of Sacramento, State and Eastern District of California, did
5 knowingly and intentionally manufacture at least 100 marijuana plants, a Schedule I Controlled
6 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

7 COUNT ELEVEN; [18 U.S.C. § 1956(a)(2)(A) and (h) – Conspiracy to Launder Money]

8 The Grand Jury further charges: T H A T

9 XIU PING LI

10 defendant herein, from on or about January 14, 2016 to on or about July 26, 2017, in the County of
11 Sacramento, State and Eastern District of California, and elsewhere, did knowingly combine, conspire,
12 and agree with other persons known and unknown to the Grand Jury to commit offenses against the
13 United States in violation of Title 18, United States Code, Section 1956, to wit: to transport, transmit
14 and transfer and attempt to transport, transmit and transfer a monetary instrument and funds to the
15 United States from and through a place outside the United States with the intent to promote the carrying
16 on of specified unlawful activity, that is, violations of Title 21, United States Code, Sections 841 and
17 846, Conspiracy to Manufacture Marijuana and Manufacture of Marijuana, all in violation of Title 18,
18 United States Code, Section 1956(a)(2)(A) and (h); and 18 U.S.C. § 2.

19
20 MANNER AND MEANS:

21
22 On or about January 22, 2016, XIU PING LI received a wire transfer of \$48,985.00 from account
23 number XXXX1187 at China Construction Bank in Fujian, China to XIU PING LI 's Bank of America
24 account number XXXX6819. XIU PING LI used this wire transfer as part of her down payment to buy
25 7810 Elsie Avenue, Sacramento, California, for the purpose of converting the residence into an indoor
26 marijuana grow site.

27
28 On or about January 25, 2016, XIU PING LI received a wire transfer of \$48,985.00 from account

1 number XXXX1484 at China Construction Bank in Fujian, China to XIU PING LI 's Bank of America
2 account number XXXX6819. XIU PING LI used this wire transfer as part of her down payment to buy
3 7810 Elsie Avenue, Sacramento, California, for the purpose of converting the residence into an indoor
4 marijuana grow site.

5
6 On or about May 10, 2016, XIU PING LI received a wire transfer of \$49,985.00 from account
7 number XXXX7285 at China Construction Bank in Fujian, China to XIU PING LI's Bank of America
8 account number XXXX6819. XIU PING LI used this wire transfer as part of her down payment to buy
9 13734 Montfort Road, Herald, California, for the purpose of converting the residence into an indoor
10 marijuana grow site.

11
12 COUNTS TWELVE THROUGH FOURTEEN; [18 U.S.C. § 1956(a)(2)(A) – Money Laundering]

13 The Grand Jury further charges: T H A T

14 XIU PING LI,

15
16 defendant herein, on or about the dates set forth below, in the County of Sacramento, State and Eastern
17 District of California, and elsewhere, did knowingly and intentionally transport, transmit, and transfer
18 funds and aid and abet others to transport, transmit, and transfer funds to the United States from and
19 through a place outside the United States with the intent to promote the carrying on of specified
20 unlawful activity: to wit, the manufacture of marijuana in violation of Title 21, United States Code,
21 Section 841(a)(1), as follows:

22 //

23
24 //

25 //
26
27
28

Count	Date	Amount
12	January 22, 2016	\$48,985.00
13	January 25, 2016	\$48,985.00
14	May 10, 2016	\$49,985.00

all in violation of Title 18, United States Code, Section 1956(a)(2)(A) and 18 U.S.C. § 2.

FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) and 18 U.S.C. 982(a)(1) – Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One through Ten of this Indictment, defendants XIU PING LI, GUI WEN PAN, XIU RU LI, DAO ZHONG WEI, YONG JIE LIU, YOU AN LI, SHUI PING ZHENG, KONG LIANG LI, GUANGZHAO LI, AND HUANG CHEN, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), the following property:

a. All right, title, and interest in any and all property involved in violations of Title 21, U.S.C. § 841(a)(1), or conspiracy to commit such offenses, for which defendant is convicted, and all property traceable to such property, including the following: all real or personal property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of such offenses; and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of the offenses.

b. A sum of money equal to the total amount of proceeds obtained as a result of the offenses, or conspiracy to commit such offenses, for which defendants are convicted.

2. Upon conviction of one or more of the offenses alleged in Counts Eleven through Fourteen of this Indictment, defendant XIU PING LI shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, which constitutes or is derived from proceeds traceable to such violations, and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations, including but not limited to:

a. A sum of money equal to the total amount of proceeds obtained as a result of the

1 offenses, or conspiracy to commit such offenses, for which defendant is convicted.

2 3. If any property subject to forfeiture, as a result of the offenses alleged in One through
3 Fourteen of this Indictment, for which defendants are convicted:

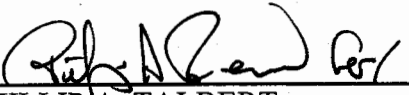
- 4 a. cannot be located upon the exercise of due diligence;
5 b. has been transferred or sold to, or deposited with, a third party;
6 c. has been placed beyond the jurisdiction of the Court;
7 d. has been substantially diminished in value; or
8 e. has been commingled with other property which cannot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

10 it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1), incorporating 21 U.S.C. § 853(p),
11 to seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

12
13 A TRUE BILL.

14 **/s/ Signature on file w/AUSA**

15
16 _____
17 FOREPERSON

18 
19 _____
20 PHILLIP A. TALBERT
21 United States Attorney
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No. _____

2:17 - CR - - 136 KJM

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

XIU PING LI
GUI WEN PAN
XIU RU LI
DAO ZHONG WEI
YONG JIE LIU
YOU AN LI
SHUI PING ZHENG
KONG LIANG LI
GUANGZHAO LI
HUANG CHEN

INDICTMENT

VIOLATION(S): 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture and to Possess with Intent to Distribute Marijuana; 21 U.S.C. § 841(a)(1) – Manufacture of Marijuana (9 Counts); 18 U.S.C. § 1956 – Conspiracy to Commit Money Laundering; 18 U.S.C. § 1956 – Money Laundering (3 Counts); 21 U.S.C. § 853(a) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 10th day

of August, A.D. 20 17

Judy Greer

Clerk.

Bail, \$

NO BAIL WARRANT

— as to Shui Ping Zheng

NO PROCESS NECESSARY

— as to remaining defendants

[Handwritten Signature]

United States v. Xiu Ping Li, et al.
Penalties for Indictment

Defendants

XIU PING LI, GUI WEN PAN, XIU RU LI, DAO ZHONG WEI, YONG JIE LIU, YOU AN LI,
SHUI PING ZHENG, KONG LIANG LI, GUANGZHAO LI, AND HUANG CHEN

COUNT 1: XIU PING LI, YONG JIE LIU, YOU AN LI,

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Manufacture Over 1,000
Plants of Marijuana

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in
prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

GUI WEN PAN, XIU RU LI, DAO ZHONG WEI, SHUI PING ZHENG, KONG LIANG LI,
GUANGZHAO LI, AND HUANG CHEN

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Manufacture Over 100 Plants
of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in
prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 2: **XIU PING LI, XIU RU LI, and DAO ZHONG WEI**

VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in
prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 3: **XIU PING LI, YONG JIE LIU, and HUANG CHEN**

VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 4: **YOU AN LI, and SHUI ZHENG,**
VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 5: **YOU AN LI, and SHUI ZHENG,**
VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 6: **XIU RU LI, and GUI WEN PAN**
VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 7: **GUI WEN PAN,**
VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or

Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 8: **XIU PING LI, DAO ZHONG WEI, and GUANGZHAO LI**
VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 9: **YOU AN LI and KONG LIANG LI**
VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 10: **GUI WEN PAN, and DAO ZHONG WEI**
VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture more than 100 plants of Marijuana

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 11-14: **XIU PING LI**

VIOLATION: 18 U.S.C. §§ 1956(a)(2)(A), 1956(h) – International Money Laundering and Conspiracy to Commit International Money Laundering

PENALTIES: Up to 20 years in prison;
Fine of up to \$500,000 or twice the value of the monetary instrument or funds involved, whichever is greater;

Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: all Defendants

VIOLATION: 21 U.S.C. § 853(a) - Criminal Forfeiture

PENALTIES: As stated in the charging document