

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.
 :
 v. :
 :
 SOON AH KOW : 18 U.S.C. §§ 371, 545, 2320,
 : 2342(a) & 2
 : 21 U.S.C. §§ 952(a), 960 & 963
 :
 :
 :
 : I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT 1

From at least as early as in or about December 2010 through
in or about December 2011, in the Philippines, in Essex County,
in the District of New Jersey and elsewhere, defendant

SOON AH KOW

did knowingly and intentionally conspire and agree with H.S.S.,
H.L.C., and others to import into the United States from a place
outside thereof, namely, Taiwan, 50 grams or more of
methamphetamine, its salts, isomers, and salts of its isomers,
contrary to Title 21, United States Code, Sections 952(a) and
960(b)(1)(H).

In violation of Title 21, United States Code, Section 963.

COUNT 2

In or about August 2011, in Essex County, in the District of New Jersey and elsewhere, defendant

SOON AH KOW

did knowingly and intentionally import into the United States from a place outside thereof, namely, Taiwan, 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers.

In violation of Title 21, United States Code, Sections 952(a) and 960(b)(1)(H) and Title 18, United States Code, Section 2.

COUNT 3

From at least as early as in or about August 2008 through in or about December 2011, in Essex County, in the District of New Jersey and elsewhere, defendant

SOON AH KOW

did knowingly ship, transport, receive, possess, sell, distribute, and purchase contraband cigarettes, in violation of Title 18, United States Code, Section 2342(a) and Section 2.

COUNTS 4 THROUGH 8

On or about the dates set forth below, in Essex County, in the District of New Jersey and elsewhere, defendant

SOON AH KOW

did fraudulently and knowingly import and bring into the United States any merchandise contrary to law -- namely, cigarettes and footwear -- and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise after importation, knowing the same to have been imported and brought into the United States contrary to law, each constituting a separate count of this Indictment:

Count	Approximate Date	Goods
4	May 19, 2009	Cigarettes
5	May 4, 2010	Cigarettes
6	June 10, 2010	Footwear
7	August 31, 2010	Footwear
8	September 23, 2010	Footwear

All in violation of Title 18, United States Code, Section 545 and Section 2.

COUNT 9

From at least as early as in or about August 2008 through in or about December 2011, in Essex County, in the District of New Jersey and elsewhere, defendant

SOON AH KOW

did knowingly and intentionally conspire and agree with N.G. and others to intentionally traffic or attempt to traffic in goods and services -- namely, footwear and cigarettes -- and knowingly used a counterfeit mark on or in connection with such goods, the use of which was likely to cause confusion, to cause mistake, and to deceive, contrary to Title 18, United States Code, Section 2320(a).

In violation of Title 18, United States Code, Section 371.

COUNTS 10 THROUGH 14

On or about the dates set forth below, in Essex County, in the District of New Jersey and elsewhere, defendant

SOON AH KOW

did knowingly and intentionally traffic or attempt to traffic in goods and services -- namely, footwear and cigarettes -- and knowingly used a counterfeit mark on or in connection with such goods, the use of which was likely to cause confusion, to cause mistake, and to deceive, each constituting a separate count of this Indictment:

Count	Approximate Date	Goods
10	May 19, 2009	Cigarettes
11	May 4, 2010	Cigarettes
12	June 10, 2010	Footwear
13	August 31, 2010	Footwear
14	September 23, 2010	Footwear

All in violation of Title 18, United States Code, Section 2320(a).

FIRST FORFEITURE ALLEGATION

1. The United States hereby gives notice to the defendant charged in Count One that, upon his conviction of such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, including but not limited to the following:

A sum of money equal to at least \$2,000,000 in United States currency, representing the amount of proceeds obtained as a result of the drug trafficking offense alleged in Count One.

2. If by any act or omission of the defendant the property subject to forfeiture described in paragraph 1:

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

it is the intent of the United States, pursuant to 21 U.S.C. §853(p), to seek forfeiture of any other property of said defendant up to the value of the property described above in paragraph 2.

Pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
United States Attorney

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

SOON AH KOW

INDICTMENT FOR

18 U.S.C. §§ 371, 545, 2320, 2342 & 2
21 U.S.C. §§ 952(A), 960 & 963

A True Bill,

Foreperson

PAUL J. FISHMAN

UNITED STATES ATTORNEY

NEWARK, NEW JERSEY

ZACH INTRATER

ASSISTANT U.S. ATTORNEY

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