

NS:NEM/DEL
F. #2020R00580/OCDETF#NY-NYE-890

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

I N D I C T M E N T

1:22-cr-00208(WFK)(TAM)

- against -

Ct. No. _____
(T. 18, U.S.C., §§ 981(a)(1)(C), 1958(a),
2 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

QING MING YU,
also known as "Allen Yu,"
ANTONY ABREU,
also known as "Anthony,"
YOU YOU,
also known as "Eddie," and
ZHE ZHANG,
also known as "Zack,"

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE
(Murder-for-Hire Conspiracy)

1. In or about and between August 2018 and February 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants QING MING YU, also known as "Allen Yu," ANTONY ABREU, also known as "Anthony," YOU YOU, also known as "Eddie," and ZHE ZHANG, also known as "Zack," together with others, did knowingly and intentionally conspire to use and cause another to use one or more facilities of interstate commerce, to wit: one or more cellular telephones, the Internet and a rental vehicle, with intent that a murder be committed in violation of New York Penal Law Section 125.25, to wit: the murder of Xin Gu, as consideration for the

receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, and the death of Xin Gu did result.

(Title 18, United States Code, Sections 1958(a) and 3551 et seq.)

COUNT TWO
(Murder-for-Hire)

2. On or about February 12, 2019, within the Eastern District of New York and elsewhere, the defendants QING MING YU, also known as “Allen Yu,” ANTONY ABREU, also known as “Anthony,” YOU YOU, also known as “Eddie,” and ZHE ZHANG, also known as “Zack,” together with others, did knowingly and intentionally use and cause another to use one or more facilities of interstate commerce, to wit: one or more cellular telephones, the Internet and a rental vehicle, with intent that a murder be committed in violation of New York Penal Law Section 125.25, to wit: the murder of Xin Gu, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, and the death of Xin Gu did result.

(Title 18, United States Code, Sections 1958(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendants that, upon their conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON


BREON PEACE /
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2020R00580/OCDETF#NY-NYE-0890
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

QING MING YU, also known as "Allen Yu," ANTONY ABREU,
also known as "Anthony," YOU YOU, also known as "Eddie," and
ZHE ZHANG, also known as "Zack,"

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 1958(a), and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Devon Lash, Assistant U.S. Attorney (718) 254-6014