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**FILED**  
Clerk  
District Court

**AUG 01 2019**

for the Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN MARIANA ISLANDS**

10 **UNITED STATES OF AMERICA,**

11 Plaintiff,

12 vs.

13 **LIWEN WU (a/k/a "Peter Wu"),**  
**JIANMIN XU, and YAN SHI,**

14 Defendants.

Criminal Case No. 1:18-cr-00008

**SUPERSEDING**  
**INDICTMENT**

**Count One:**

Title 18, U.S.C. § 1962(d), RICO Conspiracy

**Count Two:**

Title 8, U.S.C. § 1324(a)(1)(A)(iii) and (v)(I),  
Conspiracy to Harbor Illegal Aliens

**Counts Three to Thirty-Four:**

Title 8, U.S.C. § 1324(a)(1)(A)(iii),  
Harboring Illegal Aliens

**Counts Thirty-Five to Sixty-Six:**

Title 8, U.S.C. § 1324a, and Title 18, U.S.C. §  
2, Unlawful Employment of Aliens

**Counts Sixty-Seven to Seventy-One:**

Title 18, U.S.C. §§ 1956 and 2, International  
Promotional Money Laundering

1 THE GRAND JURY CHARGES THAT:

2 **INTRODUCTION**

3 Private Entities

4 At all times relevant to this Superseding Indictment:

5 1. Imperial Pacific International (CNMI), LLC (“IPI”) was a company incorporated  
6 and doing business in the Commonwealth of the Northern Mariana Islands (“CNMI”). IPI was  
7 wholly-owned by Imperial Pacific International Holdings Limited (“IPI HK”), a business  
8 registered in Bermuda and with its principal place of business in Hong Kong, People’s Republic  
9 of China.

10 2. MCC International Saipan Ltd. Co. (“MCC CNMI”) was a company incorporated  
11 and doing business in the CNMI. MCC CNMI was a wholly-owned subsidiary of China  
12 Metallurgical Group Corporation (“MCC China”), a state-owned business incorporated in the  
13 People’s Republic of China.

14 3. Marianas Enterprises Limited (“MEP”) was a company incorporated and doing  
15 business in the CNMI. MEP was wholly-owned by IPI and performed services for IPI and its  
16 contractors, including recruitment, importation, housing, and transportation of foreign workers.

17 4. Worldwide Asia Engineering Limited (“WWA”) was a company incorporated and  
18 doing business in Hong Kong. In August 2015, WWA contracted with IPI to recruit and supply  
19 workers for a casino construction project.

20 Government Agencies

21 At all times relevant to this Superseding Indictment:

22 5. The United States Department of Homeland Security (“DHS”) Citizenship and  
23 Immigration Services (“CIS”) was an agency of the United States responsible for processing and  
24 reviewing applications for immigration benefits and employment-based visa petitions pursuant to

1 the Immigration and Nationality Act.

2 6. The United States Customs and Border Protection (“CBP”) was an agency of the  
3 United States responsible for managing, securing, and controlling the country’s borders, a task  
4 which includes ensuring foreign visitors have lawful authority to enter the United States.

5 Co-conspirators

6 At all times relevant to this Superseding Indictment:

7 7. LIWEN WU (a/k/a “Peter Wu”) was a citizen of the Republic of China (Taiwan),  
8 and was a senior executive for IPI and WWA, and manager of MEP.

9 8. JIANMIN XU was a citizen of the People’s Republic of China and acted as a  
10 senior executive for IPI.

11 9. YAN SHI was a citizen of the People’s Republic of China and was a project  
12 supervisor for MCC CNMI.

13 10. Unindicted Co-conspirator No. 1 was a citizen of the People’s Republic of China  
14 and was a senior executive for IPI and WWA.

15 11. Unindicted Co-conspirator No. 2 was a citizen of the People’s Republic of China  
16 and was a senior executive for IPI HK.

17 12. Unindicted Co-conspirator No. 3 was a citizen of the People’s Republic of China  
18 and was a senior executive for MCC China.

19 13. Unindicted Co-conspirator No. 4 was a citizen of the People’s Republic of China  
20 and was a senior executive for MCC CNMI. On September 25, 2017, Unindicted Co-conspirator  
21 No. 4 pled guilty to one count of a pattern and practice of Unlawful Employment of Aliens, in  
22 violation of Title 8, United States Code, Sections 1324a(a)(1)(A), 1324a(a)(2), and 1324a(f)(1).

23 LIWEN WU, JIANMIN XU, Unindicted Co-conspirator No. 1, and Unindicted Co-  
24 conspirator No. 2 are referred to collectively as “IPI Defendants”; YAN SHI, Unindicted Co-

1 conspirator No. 3, and Unindicted Co-conspirator No. 4 are referred to collectively as “MCC  
2 Defendants”; LIWEN WU, JIANMIN XU, and YAN SHI are referred to collectively as  
3 “Defendants.”

4 Other Individuals

5 14. Individual 1 was a citizen of the People’s Republic of China employed by MEP  
6 and was subordinate to LIWEN WU and JIANMIN XU.

7 15. Individual 2 was a citizen of the People’s Republic of China employed by MCC  
8 China and was subordinate to Unindicted Co-conspirator No. 3.

9 16. Individual 3 was a citizen of the People’s Republic of China employed by MCC  
10 CNMI and was subordinate to Unindicted Co-conspirators No. 3 and No. 4.

11 17. Individual 4 was a citizen of the People’s Republic of China employed by MEP  
12 and IPI and was subordinate to LIWEN WU and Unindicted Co-conspirator No. 2.

13 18. Individual 5 was an unidentified employee of either IPI or MEP.

14 Background

15 19. The United States assumed control of the CNMI’s borders on November 28,  
16 2009, pursuant to the Consolidated Natural Resources Act of 2008. To ease the transition from  
17 CNMI to federal control of immigration, the United States introduced two temporary programs  
18 unique to the CNMI. First, the CNMI-Only Transitional Worker program, or “CW-1 Program,”  
19 enabled eligible employers conducting legitimate business in the CNMI to hire qualified alien  
20 workers, provided there were no qualified U.S. resident workers to fill those jobs. The number  
21 of CW-1 workers could not exceed a numerical limitation in a given year. The regulations  
22 governing the CW-1 Program are set forth in 8 C.F.R. § 214.2(w). Second, by exercise of the  
23 Secretary of Homeland Security’s parole authority, the United States created a conditional parole  
24 program, or “CP Program,” which permitted Chinese and Russian nationals visa-free entry into

1 the CNMI for “business or pleasure” only. The CP Program limited stays in the CNMI to a  
2 maximum of forty-five days and explicitly prohibited recipients from engaging in “local  
3 employment or labor for hire.”

4 20. In August 2014, the CNMI government granted IPI exclusive rights to build a  
5 large hotel and casino in Garapan, the primary business and tourism district on the island of  
6 Saipan. The license agreement imposed deadlines for completing various phases of the project;  
7 failure to meet those deadlines would result in monetary penalties payable to the CNMI.

8 21. Construction began on the worksite in July of 2015. IPI contracted with several  
9 Chinese construction companies for the project, including MCC China. MCC China then formed  
10 MCC CNMI as its U.S. subsidiary.

11 22. Availing of the CW-1 Program, as well as the jurisdiction’s comparably low wage  
12 rates, IPI, MCC CNMI, and the other contractors chose to import nearly all of their employees  
13 from China instead of hiring U.S. citizens or otherwise eligible foreign nationals. However,  
14 DHS and CIS limited the number of CW-1 visas for the project’s companies to several hundred.

15 23. Beginning as early as September 2015, Defendants LIWEN WU and JIANMIN  
16 XU and Unindicted Co-conspirator No. 1 pressured MCC CNMI to accelerate work, threatening  
17 to impose fines if the contractors failed to meet deadlines. As part of this pressure, Defendants  
18 LIWEN WU and JIANMIN XU and Unindicted Co-conspirator No. 1 implicitly and explicitly  
19 ordered MCC CNMI to hire unauthorized alien workers, referred to informally as “heigong,”  
20 Mandarin for “black worker.”

21 24. In addition to hiring workers who were already present in the CNMI, living either  
22 illegally or present with non-working visas, IPI Defendants encouraged, authorized, and  
23 instructed MCC CNMI to import workers from China using the CP Program.

1           25.    To do this, IPI Defendants, MCC Defendants, and other foreign contractors  
2 instigated a plan to deceive CBP by instructing prospective hires in China to lie to immigration  
3 inspectors, claiming they wished to enter the CNMI as tourists under the CP Program.

4           26.    Over the next year, in response to heightened scrutiny by CBP inspectors,  
5 Defendants and Unindicted Co-Conspirators No. 1, No. 2, No. 3, and No. 4 promulgated  
6 increasingly elaborate schemes of deception, including but not limited to, providing costumes  
7 and backstories to hired workers, as well as pairing them with existing female employees in  
8 China.

9           27.    The female employees posed as the illegal foreign workers' spouses or girlfriends  
10 in exchange for paid vacations to the CNMI. In addition to reimbursing MCC CNMI and other  
11 contractors for the illegal workers' salaries, IPI Defendants also purchased plane tickets and paid  
12 other expenses for the illegal workers and their fake spouses or girlfriends.

13           28.    Once in the CNMI, the aliens worked without authorization, receiving their wages  
14 either in cash or via electronic transfer between bank accounts in China. Most remained in the  
15 CNMI long after their CP status expired.

16           29.    MCC CNMI and other contractors invoiced IPI to pay their workers, both legal  
17 and illegal. These invoices distinguished legal and illegal workers, with illegal workers  
18 receiving wages lower than legal workers, and almost always below the minimum wage.

19           30.    Upon receiving an invoice, IPI or IPI HK reimbursed MCC CNMI by check or  
20 wire transfer to and from accounts in China and the CNMI.

21           31.    IPI HK and IPI also wired money to MEP to transport, feed, and house legal and  
22 illegal foreign workers together at a compound in Tanapag village, as well as in hotels and other  
23 rented properties around the island of Saipan.



**PURPOSES OF THE ENTERPRISE**

- 1
- 2 36. The purposes of the Enterprise included the following:
- 3 a. To reduce labor costs by inducing aliens to travel to the United States for the
- 4 purpose of encouraging them to enter and remain in the United States in violation
- 5 of the laws of the United States.
- 6 b. To avoid complying with the immigration and labor laws of the United States
- 7 through the use of fraud and deceit.
- 8 c. To avoid taxes and penalties that would be imposed by the Federal and CNMI
- 9 governments for violating the immigration, labor, and other laws through fraud
- 10 and deceit.

**MEANS AND METHODS OF THE ENTERPRISE**

11 37. Among the means and methods used by Defendants, members, and associates of

12 the Enterprise in conducting and participating in the conduct of the affairs of the Enterprise, were

13 the following:

- 14 a. Members and associates of the Enterprise hired, employed, harbored, and induced
- 15 foreign workers to enter the United States illegally for the purpose of completing
- 16 construction of the casino project.
- 17 b. Members and associates of the Enterprise evaded and violated wage and labor
- 18 laws by directing illegal foreign workers to obtain and turn over information for
- 19 bank accounts in China. In this way, wage payments could be made entirely
- 20 within China and thereby evade United States regulators.
- 21 c. Members and associates of the Enterprise concealed the location of illegal foreign
- 22 workers for the purpose of defrauding the United States as to their true
- 23 immigration status.
- 24 d. Members and associates of the Enterprise encouraged and trained illegal foreign
- workers for the purpose of deceiving agencies of the United States.
- e. Members and associates of the Enterprise financed the illegal foreign workers' travel from China to the CNMI, transportation within the CNMI, accommodations, food, and other expenses.

**COUNT ONE**

**RICO Conspiracy**

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2  
3 38. Paragraphs 1 through 37 of the Superseding Indictment are re-alleged as if fully  
4 incorporated in this Count.

5 39. Beginning in or around September 2015, and continuing through on or about  
6 March 31, 2017, in the District of the Northern Mariana Islands, and elsewhere, Defendants  
7 LIWEN WU, JIANMIN XU, and YAN SHI, and others known and unknown to the grand jury,  
8 being persons employed by and associated with the Enterprise, which was engaged in, and the  
9 activities of which affected, interstate and foreign commerce, did knowingly and intentionally  
10 combine, conspire, confederate, and agree with one another to violate Title 18, United States  
11 Code, Section 1962(c); that is, to conduct and participate, directly and indirectly, in the conduct  
12 of the affairs of the Enterprise through a pattern of racketeering activity, as defined in Title 18,  
13 United States Code, Sections 1961(1) and (5), consisting of multiple acts indictable under:

- 14 (1) 8 U.S.C. § 1324, acts committed for the purpose of financial gain  
(relating to bringing in and harboring certain aliens); and  
15 (2) 18 U.S.C. § 1956 (relating to the laundering of monetary instruments).

16 **Overt Acts**

17 40. In furtherance of the racketeering conspiracy, and to effect the object thereof,  
18 Defendants and others committed and caused to be committed the following overt acts, among  
19 others, in the District of the Northern Mariana Islands, and elsewhere:

20 a. On or about September 17, 2015, JIANMIN XU signed “agree” to a  
21 written request from MCC CNMI to use construction workers with tourist visas on the  
22 casino construction project, and to have IPI reimburse MCC CNMI for related expenses.

23 b. In or before February 2017, Defendants and Unindicted Co-Conspirators  
24 No. 1, No. 2, No. 3, and No. 4 created a scheme to deceive CBP by recruiting men from

1 China who would travel to Saipan, along with female companions provided by the  
2 companies in China, by posing as tourist couples.

3 c. On or about February 23, 2017, Defendants, Unindicted Co-Conspirators  
4 No. 1, No. 2, No. 3, and No. 4, and other associates of the Enterprise created a WeChat  
5 page titled “MEP Visa Arrangement Trip,” the purpose of which was to plan and  
6 facilitate the entry of thirty-five illegal workers from China into the CNMI using the CP  
7 Program.

8 d. On or about February 24, 2017, using the WeChat MEP Visa Arrangement  
9 Trip page, Defendants and Unindicted Co-Conspirators No. 1, No. 2, No. 3, and No. 4  
10 caused to be transmitted and shared plane itineraries for twenty-nine illegal foreign  
11 workers and their paid companions.

12 e. On or about February 24, 2017, LIWEN WU purchased an airplane ticket  
13 for one of the illegal foreign worker using an American Express corporate credit card  
14 ending in 2008.

15 f. On or about February 25, 2017, using the WeChat MEP Visa Arrangement  
16 Trip page, Unindicted Co-conspirator No. 2 gave an illegal foreign worker instructions on  
17 how to transit through Je Ju Island airport, and attached templates for completing United  
18 States and CNMI customs and immigration forms, directing: “Here is a sample of the  
19 customs form. Have everyone store it in his/her cell phone so that he/she can refer to it  
20 while filling out the form on the plane.”

21 g. On or about February 25, 2017, using the WeChat MEP Visa Arrangement  
22 Trip page, Unindicted Co-conspirator No. 3 sent a list of illegal foreign workers and their  
23 female companions to Individual 4, along with pictures of their passports, and wrote:  
24

1 [Individual 4], thanks. Also, I am planning to send you information on the second  
2 group of workers (20 persons) and the passport information of our female  
3 compatriots. (The first pages of workers' passports have been collected and their  
4 past foreign visa page are being scanned.) In this case, please kindly confirm  
your selection so that I can notify the workers to come to Shanghai on 2/27  
(Monday), provide training and start booking their tickets. They will fly to  
Saipan on 2/28.

5 h. On or about February 25, 2017, using the WeChat MEP Visa Arrangement  
6 Trip page, Unindicted Co-conspirator No. 3 directed Individual 1 and Individual 2 to  
7 estimate the airfares for twenty workers and to remit the amount to a designated account  
8 in China. Individual 1 estimated the amount at 150,000 Chinese Renminbi; Unindicted  
9 Co-conspirator No. 3 then directed Individual 2 to remit that amount.

10 i. On or about February 25, 2017, using the WeChat MEP Visa Arrangement  
11 Trip page, Unindicted Co-conspirator No. 2 directed Individual 5 to transmit and share  
12 plane itineraries for twenty-three illegal workers and their paid companions.

13 j. On or about February 26, 2017, using the WeChat MEP Visa Arrangement  
14 Trip page, Unindicted Co-conspirator No. 3 transmitted to Individual 3 a chart identifying  
15 fifteen illegal foreign workers and their paid companions, instructed Individual 3 to  
16 review the groupings, and if appropriate, make them hotel reservations in the CNMI.

17 k. On or about February 26, 2017, using the WeChat MEP Visa Arrangement  
18 Trip page, Defendants and Unindicted Co-Conspirators No. 1, No. 2, No. 3, and No. 4  
19 caused to be transmitted and shared plane itineraries for thirty-one illegal workers and  
20 their paid companions.

21 l. On or about February 27, 2017, LIWEN WU purchased an airplane ticket  
22 for two of the illegal foreign workers and two paid companions, using an American  
23 Express corporate credit card ending in 2008.

1 m. On or about February 27, 2017, using the WeChat MEP Visa Arrangement  
2 Trip page, Defendants and Unindicted Co-Conspirators No. 1, No. 2, No. 3, and No. 4  
3 caused to be transmitted and shared return-trip plane itineraries for eleven illegal workers  
4 and their paid companions.

5 n. On or about February 28, 2017, using the WeChat MEP Visa Arrangement  
6 Trip page, Unindicted Co-conspirator No. 2 transmitted to Unindicted Co-conspirator No.  
7 3 and Individual 1 a chart, noting a problem with certain return dates, which were  
8 highlighted.

9 o. On or about February 28, 2017, using the WeChat MEP Visa Arrangement  
10 Trip page, LIWEN WU asked YAN SHI and Individual 3 “is the lodging in Saipan  
11 okay?” to which, YAN SHI responded “I am about to report to you, we’re looking for  
12 hotels now” and “[n]eed two living quarters for the workers by afternoon.”

13 p. On or about February 28, 2017, using the WeChat MEP Visa Arrangement  
14 Trip page, Individual 3 noted they still needed ten room reservations, to which LIWEN  
15 WU replied: “Short ten, how [many] rooms are the females actually staying in?”  
16 Individual 3 responded: “Actually need six,” and then queried whether it would work to  
17 make a few reservations, and if asked, falsely claim that additional reservations had been  
18 made. LIWEN WU responded: “Yes.”

19 q. On or about March 6, 2017, using the WeChat MEP Visa Arrangement  
20 Trip page, Unindicted Co-conspirator No. 3 instructed Individual 1 to book a return ticket  
21 for one of the paid female companions.

22 r. On or about March 7, 2017, YAN SHI invited members and associates of  
23 the Enterprise to a group chat and warned “To all, please pay high attention. If the  
24

1 workers do not have status, please don't let them go to a doctor at the local hospital. The  
2 project department will think about a solution.”

3 In violation of Title 18, United State Code, Section 1962(d).

4  
5 **COUNT TWO**

6 **Conspiracy to Harbor Illegal Aliens**

7 41. Beginning on or about February 24, 2017, and continuing to on or about February  
8 28, 2017, in the District of the Northern Mariana Islands, and elsewhere, Defendants LIWEN  
9 WU, JIANMIN XU, and YAN SHI did unlawfully, knowingly, and intentionally combine,  
10 confederate, conspire, and agree together and with others, known and unknown to grand jury, to  
11 knowingly and in reckless disregard for the fact that aliens had come to, entered, and remained in  
12 the United States in violation of law, concealed, harbored, and shielded from detection such  
13 aliens in any place, for the purpose of commercial advantage and private gain, in violation of  
14 Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (v)(I).

15 **COUNTS THREE THROUGH THIRTY-FOUR**

16 **Harboring Illegal Aliens**

17 42. Beginning on or about and continuing to on or about the below dates, in the  
18 District of the Northern Mariana Islands. and elsewhere, Defendants LIWEN WU, JIANMIN  
19 XU, and YAN SHI, and others known and unknown to the grand jury, aiding and abetting each  
20 other, did knowingly and in reckless disregard of the fact that an alien, as named below, came to,  
21 entered, and remained in the United States in violation of law, concealed, harbored, and shielded  
22 from detection, such alien in any place, and attempted to do so, for the purpose of commercial  
23 advantage and private financial gain:  
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<u>Count</u>	<u>Illegal Alien</u>	<u>Dates of Harboring</u>	
		<u>From</u>	<u>To</u>
3.	D.C.	Feb. 26, 2017	Mar. 31, 2017
4.	X. W.	Feb. 26, 2017	Mar. 31, 2017
5.	H. W.	Feb. 26, 2017	Mar. 31, 2017
6.	L. C.	Feb. 26, 2017	Mar. 31, 2017
7.	M. J.	Feb. 26, 2017	Mar. 31, 2017
8.	Y. T.	Feb. 26, 2017	Mar. 31, 2017
9.	G. Y.	Feb. 26, 2017	Mar. 31, 2017
10.	H. J.	Feb. 26, 2017	Mar. 31, 2017
11.	C. C.	Feb. 26, 2017	Mar. 31, 2017
12.	W. H.	Feb. 26, 2017	Mar. 31, 2017
13.	H. M.	Feb. 26, 2017	Mar. 31, 2017
14.	C. D.	Feb. 27, 2017	Mar. 31, 2017
15.	J. Y.	Feb. 27, 2017	Mar. 31, 2017
16.	X. L.	Feb. 27, 2017	Mar. 31, 2017
17.	Q. C.	Feb. 27, 2017	Mar. 31, 2017
18.	H. Y.	Feb. 28, 2017	Mar. 31, 2017
19.	S. X.	Feb. 28, 2017	Mar. 31, 2017
20.	Z. B.	Feb. 28, 2017	Mar. 31, 2017
21.	C. X.	Mar. 1, 2017	Mar. 4, 2017
22.	J. J.	Feb. 28, 2017	Mar. 31, 2017
23.	Z. B.	Feb. 28, 2017	Mar. 31, 2017
24.	H. C.	Mar. 1, 2017	Mar. 31, 2017
25.	H. G.	Feb. 28, 2017	Mar. 31, 2017
26.	L. Z.	Feb. 28, 2017	Mar. 31, 2017
27.	L. K.	Mar. 1, 2017	Mar. 31, 2017
28.	W. Z.	Mar. 1, 2017	Mar. 31, 2017
29.	J. F.	Mar. 1, 2017	Mar. 31, 2017
30.	W. L.	Feb. 28, 2017	Mar. 31, 2017
31.	Y. M.	Feb. 28, 2017	Mar. 31, 2017
32.	S. G.	Feb. 28, 2017	Mar. 31, 2017
33.	G. X.	Mar. 1, 2017	Mar. 31, 2017
34.	C. G.	Feb. 28, 2017	Mar. 31, 2017

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (v)(II).

**COUNTS THIRTY-FIVE THROUGH SIXTY-SIX****Unlawful Employment of Aliens**

43. Beginning on or about and continuing to on or about the below dates, in the District of the Northern Mariana Islands, and elsewhere, Defendants LIWEN WU, JIANMIN XU, and YAN SHI, and others known and unknown to the grand jury, aiding and abetting each other, as part of a pattern and practice, hired and continued to employ the below identified aliens who the Defendants knew were not authorized to be employed in the United States, as described in Title 8, United States Code, Sections 1324a(a)(1)(A), (2), and (h)(3):

<b><u>Count</u></b>	<b><u>Unauthorized Alien</u></b>	<b><u>Dates of Employment</u></b>	
		<b><u>From</u></b>	<b><u>To</u></b>
35.	D.C.	Feb. 26, 2017	Mar. 31, 2017
36.	X. W.	Feb. 26, 2017	Mar. 31, 2017
37.	H. W.	Feb. 26, 2017	Mar. 31, 2017
38.	L. C.	Feb. 26, 2017	Mar. 31, 2017
39.	M. J.	Feb. 26, 2017	Mar. 31, 2017
40.	Y. T.	Feb. 26, 2017	Mar. 31, 2017
41.	G. Y.	Feb. 26, 2017	Mar. 31, 2017
42.	H. J.	Feb. 26, 2017	Mar. 31, 2017
43.	C. C.	Feb. 26, 2017	Mar. 31, 2017
44.	W. H.	Feb. 26, 2017	Mar. 31, 2017
45.	H. M.	Feb. 26, 2017	Mar. 31, 2017
46.	C. D.	Feb. 27, 2017	Mar. 31, 2017
47.	J. Y.	Feb. 27, 2017	Mar. 31, 2017
48.	X. L.	Feb. 27, 2017	Mar. 31, 2017
49.	Q. C.	Feb. 27, 2017	Mar. 31, 2017
50.	H. Y.	Feb. 28, 2017	Mar. 31, 2017
51.	S. X.	Feb. 28, 2017	Mar. 31, 2017
52.	Z. B.	Feb. 28, 2017	Mar. 31, 2017
53.	C. X.	Mar. 1, 2017	Mar. 4, 2017
54.	J. J.	Feb. 28, 2017	Mar. 31, 2017
55.	Z. B.	Feb. 28, 2017	Mar. 31, 2017
56.	H. C.	Mar. 1, 2017	Mar. 31, 2017
57.	H. G.	Feb. 28, 2017	Mar. 31, 2017
58.	L. Z.	Feb. 28, 2017	Mar. 31, 2017

1	59.	L. K.	Mar. 1, 2017	Mar. 31, 2017
	60.	W. Z.	Mar. 1, 2017	Mar. 31, 2017
2	61.	J. F.	Mar. 1, 2017	Mar. 31, 2017
	62.	W. L.	Feb. 28, 2017	Mar. 31, 2017
3	63.	Y. M.	Feb. 28, 2017	Mar. 31, 2017
	64.	S. G.	Feb. 28, 2017	Mar. 31, 2017
4	65.	G. X.	Mar. 1, 2017	Mar. 31, 2017
5	66.	C. G.	Feb. 28, 2017	Mar. 31, 2017

6 In violation of Title 8, United States Code, Sections 1324a(a)(1)(A), (2), and (f)(1); and Title 18,  
7 United States Code, Section 2.

8 **COUNTS SIXTY-SEVEN TO SEVENTY-ONE**

9 **International Promotional Money Laundering**

10 44. On or about the dates below, in the District of the Northern Mariana Islands, and  
11 elsewhere, Defendants LIWEN WU, JIANMIN XU, and YAN SHI, and others known and  
12 unknown to the grand jury, aiding and abetting each other, knowingly transported, transmitted,  
13 and transferred, and willingly caused the transportation, transmission, and transfer of, and  
14 procured another person to transport, transmit, and transfer the funds listed below to a place in  
15 the United States from and through a place outside the United States with the intent to promote  
16 the carrying on of specified unlawful activity, specifically, acts committed for the purpose of  
17 financial gain (relating to the bringing in and harboring certain aliens) and indictable under Title  
18 8, United States Code, Section 1324:

19	<u>Count</u>	<u>Date</u>	<u>Description</u>
20	67.	October 17, 2016	Transfer of \$6,068,475.98 from an IPI HK bank 21 account in Hong Kong ending in 3269, to an MCC CNMI bank account in Saipan ending in 8684.
22	68.	November 4, 2016	Transfer of \$2,647,516.80 from an IPI HK bank 23 account in Hong Kong ending in 3269, to an MCC CNMI bank account in Saipan ending in 8684.

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- 69. March 3, 2017 Transfer of \$1,999,978.00 from an IPI HK bank account in Hong Kong ending in 3269, to an MCC CNMI bank account in Saipan ending in 8684.
- 70. November 3, 2016 Transfer of \$9,999,988.00 from an IPI HK bank account in Hong Kong ending in 3269, to an IPI bank account in Saipan ending in 2023.
- 71. February 2, 2017 Transfer of \$3,569,978.00 from an IPI HK bank account in Hong Kong ending in 3269, to an IPI bank account in Saipan ending in 2023.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

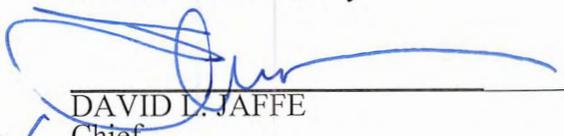
Respectfully submitted on August 1, 2019.

A TRUE BILL

Signature of foreperson has been  
**REDACTED** pursuant to the Privacy Policy of the  
Judicial Conference of the United States.



SHAWN N. ANDERSON  
United States Attorney



DAVID L. JAFFE  
Chief  
Organized Crime and Gang Section

For