Mark B. Busby CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO

United States District Court

FOR THE NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

CR25-00207 CRB

UNITED STATES OF AMERICA,

V.

CANKUN HE,
HAILONG MA,
YUXIANG WEI,
JORDAN CANTIE, and
ROBERT MAYNARD,

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1951(a) - Conspiracy to Commit Hobbs Act Robbery

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 22nd day of

July 2025

Clerk

Bail, \$ No Process

Hon. Nathanael Cousins, United States Magistrate Judge

FILED July 22, 2025 CRAIG H. MISSAKIAN (CABN 125202) 1 Mark B. Busby United States Attorney CLERK, U.S. DISTRICT COURT 2 NORTHERN DISTRICT OF CALIFORNIA 3 SAN FRANCISCO 4 5 6 7 UNITED STATES DISTRICT COURT 8 9 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 10 CASE NO. CR25-00207 CRB UNITED STATES OF AMERICA, 11 **VIOLATION:** 12 ٧. 18 U.S.C. § 1951(a) – Conspiracy to Commit CANKUN HE, 13 Robbery Affecting Interstate Commerce; HAILONG MA, 18 U.S.C. §§ 924(d)(1), 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation YUXIANG WEI, JORDAN CANTIE, and 15 ROBERT MAYNARD, SAN FRANCISCO VENUE Defendants. 16 17 18 INDICTMENT 19 The Grand Jury charges: 20 Introductory Allegations 21 At all times relevant to this Indictment: 22 Faith Fly International ("FFI") was a reshipping business located at 11034 NE Marx 1. 23 Street in Portland, Oregon. 24 2. Premier Packaging is a reshipping business located at 3510 NE 79th Avenue, Hillsboro, 25 Oregon. 26 Packages shipped by FFI are received by them from across the country and delivered 27 across the country and internationally. 28 FFI and Premier Packaging were businesses engaged in interstate commerce. 4. INDICTMENT 1

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Case 3:25-cr-00207-CRB

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Object of the Conspiracy

- 5. Beginning on a date unknown to the Grand Jury, but no later than April 14, 2025, the defendants created a plan and agreed to rob FFI in Portland, Oregon. In particular, the defendants conspired to take by force Apple iPhones that were being shipped by FFI.
- 6. HE, MA, and WEI participated in planning the robbery. HE recruited CANTIE to conduct the robbery itself, and CANTIE in turn recruited MAYNARD to participate in the robbery with CANTIE.

Method and Means of the Conspiracy

- 7. MA, WEI, CANTIE, and MAYNARD then traveled from the Northern District of California to Portland, Oregon. MA arranged to provide CANTIE and MAYNARD with supplies for the robbery, including jackets falsely marked with "FBI," bulletproof vests, zip ties, and radios.
- 8. On April 14, 2025, MA, WEI, CANTIE, and MAYNARD went to FFI. MA and WEI waited nearby in a white truck.
- 9. CANTIE and MAYNARD, driving in a black Dodge Durango, followed a vehicle driven by an FFI employee into FFI's parking lot.
- 10. CANTIE and MAYNARD turned on blue-and-red flashing lights similar to police vehicle lights and exited their vehicle.
- 11. At some point, CANTIE brandished a firearm, and CANTIE and MAYNARD issued verbal threats to the employee and his associates.
- 12. CANTIE and MAYNARD then forced the FFI employees inside FFI's building, where they used zip ties to bind the hands of the employees.
- 13. CANTIE and MAYNARD proceeded to steal approximately 200 Apple iPhones and 5 cameras, and loaded them into their vehicle before driving away.
- 14. CANTIE and MAYNARD then drove back to California and, along the way, met with HE and other unindicted co-conspirators to deliver the stolen iPhones to HE, which HE accepted.
- 15. On or about May 19, 2025, MA, WEI, MAYNARD, and others again agreed to rob another reshipping business, Premier Packaging, located at 3510 NE 79th Avenue, Hillsboro, Oregon, and drove to Oregon to do so.

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- 16. On May 19, 2025, agents detained MAYNARD and four unindicted co-conspirators on suspicion that they conspired to commit armed robbery.
- 17. Agents searched a Dodge Ram and U-Haul van associated with the co-conspirators and later determined that the Dodge Ram was registered to WEI.
- The following items were seized from the Dodge Ram: a wallet containing MA's driver's 18. license and other various cards; two government-issued identifications with WEI's photo; an immigration document with WEI's name; an Allstate insurance document with WEI's name; zip ties; a wig in a plastic bag; plastic gloves; a pair of blue/grey gardening-style gloves; a Charter Arms .38 special revolver; a Zoraki 9mm pistol; a magazine containing one blank round; a black Equate ear loop face mask; two small containers with white powder residue; and rolled paper money with suspected drug residue.
- 19. The following items were seized from the U-Haul van: a pair of orange gardening-style gloves; a large black zip tie; a set of body armor; a suspected drug pipe; a small battery-powered scale; mismatched fabric gloves; and a Powerline BB pistol.

Overt Acts

In furtherance of the conspiracy, and to accomplish the object of the conspiracy, on or about the following dates, defendants HE, MA, WEI, CANTIE, MAYNARD, and others known and unknown to the Grand Jury, committed various overt acts within the Northern District of California, including, but not limited to, the following:

- 20. On or about April 14, 2025, MA, WEI, CANTIE, and MAYNARD drove from the Northern District of California to FFI in Portland, Oregon, to rob FFI of Apple iPhones.
- 21. On or about April 15, 2025, CANTIE and MAYNARD met with HE and other unindicted co-conspirators to deliver the iPhones to HE, which HE accepted.
- 22. On or about May 19, 2025, MA, WEI, and MAYNARD again drove from the Northern District of California to Oregon to rob another reshipping business.

(18 U.S.C. § 1951(a) - Conspiracy to Engage in Robbery Affecting Interstate COUNT ONE: Commerce)

23. From a date unknown to the Grand Jury but at least as early as April 14, 2025, to on or

INDICTMENT

about May 19, 2025, in the Northern District of California, the defendants,

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Cankun HE, Hailong MA, Yuxiang WEI, Jordan CANTIE, and Robert MAYNARD,

and others known and unknown to the Grand Jury, unlawfully, willfully, and intentionally did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in 18 U.S.C. § 1951, and thereby would obstruct, delay, and affect commerce and the movement of articles and commodities in interstate commerce.

All in violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION: (18 U.S.C. §§ 924(d)(1), 981(a)(1)(C) and 28 U.S.C. § 2461(c))

- 24. The allegations contained Paragraphs 1 through 22 of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
 - 25. Upon conviction of the offense set forth in Count One of this Indictment, the defendants,

Cankun HE, Hailong MA, Yuxiang WEI, Jordan CANTIE, and Robert MAYNARD,

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in that violation, and any property, real or personal, which constitutes or is derived from proceeds traceable to the violations, including but not limited to a forfeiture money judgment. The property to be forfeited includes, but is not limited to:

- 200 Apple iPhones taken from FFI on April 14, 2025;
- b. 5 cameras taken from FFI on April 14, 2025;
- c. One firearm and any ammunition carried by MAYNARD on April 14, 2025;

1	d. One Charter Arms .38 special revolver seized on May 19, 2025;
2	e. One Zoraki 9mm pistol seized on May 19, 2025;
3	f. One a magazine containing one blank round seized on May 19, 2025;
4	g. One Powerline BB pistol seized on May 19, 2025; and
5	h. One white Dodge Ram truck bearing California license plate 13992U3.
6	29. If any of the property described above, as a result of any act or omission of the
7	defendants:
8	a. cannot be located upon exercise of due diligence;
9	b. has been transferred or sold to, or deposited with, a third party;
10	c. has been placed beyond the jurisdiction of the court;
11	d. has been substantially diminished in value; or
12	e. has been commingled with other property which cannot be divided
13	without difficulty,
14	the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
15	United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).
16	All pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C), Title 28, United
17	States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.
18	DATED: July 22, 2025 A TRUE BILL.
19	<u>/s/ Grand Jury Foreperson</u> FOREPERSON
20	CRAIG H. MISSAKIAN
21	United States Attorney
22	<u>/s/ Kevin Yeh</u> KEVIN YEH
23	Assistant United States Attorney
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INDICTMENT