

UNITED STATES DISTRICT COURT FILED 15 NOV '18 16:32 USDC-ORP
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:18-cr- 557 SI

v.

INDICTMENT

HUI LING SUN,

18 U.S.C. § 1952(a)(3)

Defendant.

Forfeiture Allegation

UNDER SEAL

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Use of Interstate Facilities to Promote, Manage, Establish, Carry on
or Facilitate a Racketeering Enterprise)
(18 U.S.C. § 1952(a)(3))

On or about and between, August 21, 2015, the exact date being unknown to the grand jury, and continuing until on or about November 15, 2018, in the District of Oregon, defendant HUI LING SUN, did knowingly use a facility in interstate and foreign commerce, specifically computers and cellular telephones, with intent to promote, manage, establish, and carry on acts to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a business enterprise involving prostitution offenses in violation of the laws of the State in which they are committed, to-wit prostitution in violation of Oregon Revised Statute 167.007, and of the United States, and thereafter performed and attempted to perform an act to promote,

Indictment

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity;

In violation of Title 18, United States Code, Section 1952(a)(3).

FORFEITURE ALLEGATION

Upon conviction of the offense in Count 1, defendant **HUI LING SUN** shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property constituting or derived from proceeds traceable to the violation, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offense in the form of a money judgment.

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

- (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 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.


Dated: November 15, 2018

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney


SCOTT M. KERIN, OSB # 965128
Assistant United States Attorney