

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington

October 14, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

WOBIAO LEI,
XINMING WU,
YI JUN CHEN,
GUO GUI YU,
CHEE CHOONG NG
GUOLONG LI, and
LINGFENG LEI,

Defendants.

No. **CR20-171 JCC**

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Manufacture and Distribute Marihuana)

Beginning at a time unknown and continuing until on or about October 14, 2020, in King County, within the Western District of Washington, in Illinois, Oregon, Pennsylvania, and elsewhere, WOBIAO LEI, XINMING WU, YI JUN CHEN, GUO GUI YU, CHEE CHOONG NG, GUOLONG LI, LINGFENG LEI, and others known and unknown, did knowingly and intentionally conspire to manufacture, distribute, and

1 possess with intent to distribute, marihuana, a substance controlled under Title 21, United
2 States Code, Section 812, Schedule I.

3 With respect to WOBIAO LEI, XINMING WU, YI JUN CHEN, GUO GUI YU,
4 CHEE CHOONG NG, GUOLONG LI, and LINGFENG LEI, their conduct as members
5 of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct
6 of other members of the conspiracy charged in Count 1, involved 1000 kilograms or more
7 of a mixture or substance containing a detectable amount of marihuana and 100 or more
8 marihuana plants regardless of weight, in violation of Title 21, United States Code,
9 Sections 841(b)(1)(A) and 841(b)(1)(B).

10 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
11 841(b)(1)(B), and 846.

12
13 **COUNT 2**

14 **(Possession with Intent to Distribute Marihuana)**

15 On or about February 27, 2018, in King County, within the Western District of
16 Washington, and elsewhere, the defendants WOBIAO LEI and XINMING WU,
17 knowingly and intentionally possessed with intent to distribute, and did aid and abet the
18 possession with intent to distribute, marihuana, a substance controlled under Title 21,
19 United States Code, Section 812, Schedule I.

20 The Grand Jury further alleges that this offense was committed during and in
21 furtherance of the conspiracy charged in Count 1, above.

22 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D),
23 and Title 18, United States Code, Section 2.

24
25 **COUNT 3**

26 **(Manufacturing and Possessing with Intent to Distribute Marihuana)**

27 On or about May 18, 2020, in King County, within the Western District of
28 Washington, and elsewhere, the defendant WOBIAO LEI, knowingly and intentionally

1 manufactured and possessed with intent to distribute, and did aid and abet the
2 manufacture of and possession with intent to distribute, marihuana, a substance
3 controlled under Title 21, United States Code, Section 812, Schedule I.

4 The Grand Jury further alleges that the offense involved 100 or more marihuana
5 plants regardless of weight.

6 The Grand Jury further alleges that this offense was committed during and in
7 furtherance of the conspiracy charged in Count 1, above.

8 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),
9 and Title 18, United States Code, Section 2.

10 **ASSET FORFEITURE ALLEGATIONS**

11 All of the allegations contained in this Indictment are hereby realleged and
12 incorporated by reference for the purpose of alleging forfeiture.

13 Upon conviction of the offense alleged in Count 1, the defendants WOBIAO LEI,
14 XINMING WU, YI JUN CHEN, GUO GUI YU, CHEE CHOONG NG, GUOLONG LI,
15 and LINGFENG LEI shall each forfeit to the United States, pursuant to Title 21, United
16 States Code, Section 853, any property that constitutes or is traceable to proceeds of the
17 offense, as well as any property that facilitated the offense.

18 Upon conviction of the offense alleged in Count 2, the defendants WOBIAO LEI
19 and XINMING WU shall each forfeit to the United States, pursuant to Title 21, United
20 States Code, Section 853, any property that constitutes or is traceable to proceeds of the
21 offense, as well as any property that facilitated the offense.

22 Upon conviction of the offense alleged in Count 3, the defendant WOBIAO LEI
23 shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853,
24 any property that constitutes or is traceable to proceeds of the offense, as well as any
25 property that facilitated the offense.

26 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
27 any act or omission of the relevant defendant,

28 a. cannot be located upon the exercise of due diligence;

- 1 b. has been transferred or sold to, or deposited with, a third party;
- 2 c. has been placed beyond the jurisdiction of the Court;
- 3 d. has been substantially diminished in value; or,
- 4 e. has been commingled with other property which cannot be divided without
- 5 difficulty;

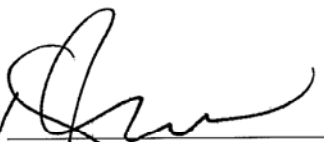
6 it is the intent of the United States to seek the forfeiture of any other property of the
 7 defendant, up to the value of the above-described forfeitable property, pursuant to Title
 8 21, United States Code, Section 853(p).

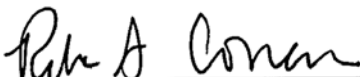
9 A TRUE BILL:

10 DATED: 10/14/2020

11 *Signature of the Foreperson redacted*
 12 *pursuant to the policy of the Judicial*
 13 *Conference of the United States*

14 _____
 15 FOREPERSON

16
 17 
 18 _____
 19 BRIAN T. MORAN
 20 United States Attorney

21
 22 
 23 _____
 24 VINCENT T. LOMBARDI
 25 Assistant United States Attorney

26
 27 
 28 _____
 29 NICHOLAS MANHEIM
 30 Assistant United States Attorney