


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.

RAYMOND NG and QIFANG CHEN,

Defendant.

No. **CR20-172 RSL**

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, and elsewhere, RAYMOND NG, QIFANG CHEN, and others known and unknown, did knowingly and intentionally conspire to manufacture, distribute, and possess with intent to distribute, marihuana, a substance controlled under Title 21, United States Code, Section 812, Schedule I.

With respect to RAYMOND NG and QIFANG CHEN, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 1,000 or more

1 marihuana plants regardless of weight, in violation of Title 21, United States Code,
2 Section 841(b)(1)(A).

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

5 **ASSET FORFEITURE ALLEGATIONS**

6 The allegations contained in Count 1 of this Indictment are hereby realleged and
7 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the
8 offense alleged in Count 1, the defendants RAYMOND NG and QIFANG CHEN shall
9 each forfeit to the United States, pursuant to Title 21, United States Code, Section 853,
10 any property that constitutes or is traceable to proceeds of the offense, as well as any
11 property that facilitated the offense. This property includes but is not limited to:

- 12 a. the real property located at 7603 South 115th Street, Seattle, Washington, titled
13 to Qifang Chen;
14 b. the real property located at 25715 18th Avenue South, Des Moines,
15 Washington, titled to Qifang Chen; and,
16 c. sums of money reflecting the proceeds each of the defendants personally
17 obtained from the offense.

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

- 20 a. cannot be located upon the exercise of due diligence;
21 b. has been transferred or sold to, or deposited with, a third party;
22 c. has been placed beyond the jurisdiction of the Court;
23 d. has been substantially diminished in value; or,
24 e. has been commingled with other property which cannot be divided without
25 difficulty;

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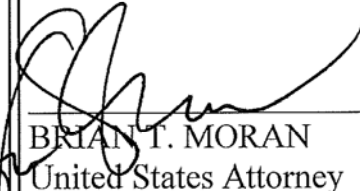
1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title
3 21, United States Code, Section 853(p).


4 A TRUE BILL:

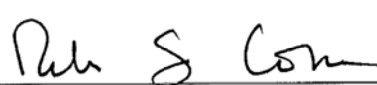
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6 DATED: 10/14/2020

7 *Signature of the Foreperson redacted*
8 *pursuant to the policy of the Judicial*
9 *Conference of the United States*

10 _____
11 FOREPERSON

12
13 
14 _____
15 BRIAN T. MORAN
16 United States Attorney

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19 _____
20 VINCENT T. LOMBARDI
21 Assistant United States Attorney

22
23 
24 _____
25 NICHOLAS MANHEIM
26 Assistant United States Attorney
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