

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

**FILED**

**OCT 15 2015**

**SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

KWOK CHEUNG CHOW,  
a/k/a "Raymond Chow,"  
a/k/a "Ha Jai,"  
a/k/a "Shrimpboy,"

*CR 14-196 CRB*

DEFENDANT(S).

## THIRD SUPERSEDING INDICTMENT

- 18 U.S.C. § 1962(d) – Conspiracy to Conduct the Affairs of an Enterprise Through a Pattern of Racketeering Activity;
- 18 U.S.C. § 1959(a) – Violent Crime in Aid of Racketeering
- 18 U.S.C. § 1956 – Money Laundering;
- 18 U.S.C. § 371 – Conspiracy;
- 18 U.S.C. § 2 – Aiding And Abetting

A true bill.



Foreman

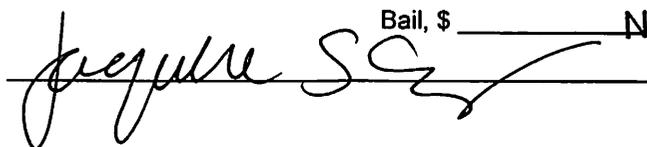
Filed in open court this 15<sup>th</sup> day of

October, 2015.

Stephen Ybana

Clerk

Bail, \$ \_\_\_\_\_ NO PROCESS



AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  COMPLAINT  INFORMATION  INDICTMENT

OFFENSE CHARGED THIRD  SUPERSEDING

Please see attached

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: Please see attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

**FILED**

▶ KWOK CHEUNG CHOW

OCT 15 2015

DISTRICT COURT NUMBER

CR 14-0196-CRB

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY  DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

14-00196-CRB

Name and Office of Person

Furnishing Information on this form BRIAN J. STRETCH

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) W. Frentzen/S.Badger/W.Hasib

**DEFENDANT**

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1)  If not detained give date any prior summons was served on above charges ▶

2)  Is a Fugitive

3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

4)  On this charge

5)  On another conviction

Federal  State

6)  Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed?  Yes  No

If "Yes" give date filed

DATE OF ARREST ▶

Month/Day/Year  
03/26/2014

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶

Month/Day/Year

This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

Arraignment  Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments:

**KWOK CHEUNG CHOW, a/k/a "Raymond Chow," a/k/a "Ha Jai," a/k/a "Shrimpboy"**

<u>Count</u>	<u>Offense</u>	<u>Maximum Penalty</u>
1	18 U.S.C. § 1962(d) – Conspiracy to Conduct the Affairs of an Enterprise Through a Pattern of Racketeering Activity	Life imprisonment 5 years supervised release \$250,000 fine \$100 special assessment
2	18 U.S.C. § 1959(a)(1) – Murder In Aid of Racketeering	Mandatory life imprisonment, or death \$250,000 fine \$100 special assessment
3	18 U.S.C. § 1959(a)(5) – Conspiracy to Commit Murder in Aid of Racketeering	10 years in prison 3 years supervised release \$250,000 fine \$100 special assessment
4-133; 139-162	18 U.S.C. § 1956 – Money Laundering	20 years in prison 3 years supervised release \$500,000 fine or twice the value of property laundered \$100 special assessment
134-138	18 U.S.C. § 371 – Conspiracy	5 years in prison 3 years supervised release \$250,000 fine \$100 special assessment

**FILED**

**OCT 15 2015**

**SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

1 BRIAN J. STRETCH (CABN 163973)  
Acting United States Attorney

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11  
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 KWOK CHEUNG CHOW,  
a/k/a "Raymond Chow,"  
16 a/k/a "Ha Jai,"  
17 a/k/a "Shrimpboy,"

18 Defendant.

) CRIMINAL NO. CR 14 0196 CRB  
)  
)  
)

**THIRD SUPERSEDING INDICTMENT**

VIOLATIONS –

) 18 U.S.C. § 1962(d) – Conspiracy to Conduct the  
) Affairs of an Enterprise Through a Pattern of  
) Racketeering Activity;  
) 18 U.S.C. § 1959(a) – Violent Crime in Aid of  
) Racketeering  
) 18 U.S.C. § 1956 – Money Laundering;  
) 18 U.S.C. § 371 – Conspiracy;  
) 18 U.S.C. § 2 – Aiding And Abetting  
)  
)

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20  
21 THIRD SUPERSEDING INDICTMENT

22 The Grand Jury charges:

23 COUNT ONE: (18 U.S.C. § 1962(d) – Conspiracy to Conduct the Affairs of an Enterprise  
24 Through a Pattern of Racketeering Activity)

25 The Racketeering Enterprise

26 1. The Chee Kung Tong, also known as "Ghee Kung Tong," also known as "Supreme  
27 Lodge Chinese Freemasons of the World," also known as the "CKT," was a predominantly Chinese  
28 American association based in Chinatown, in the City and County of San Francisco, whose members

1 operated in the City and County of San Francisco and elsewhere, and whose activities affected other  
2 parts of the United States. The members of CKT primarily conducted their activities in the Bay Area,  
3 centered in the cities of San Francisco and Oakland. CKT existed since at least the late 1800s. The  
4 roots of the CKT were the Hung Mun societies in China, which were formed largely to overthrow the  
5 Qing Dynasty in China. Members of the Hung Mun groups formed new organizations in America as  
6 their members migrated from China, including CKT. CKT was formed primarily for civic purposes to  
7 benefit the communities of Chinese immigrants and Chinese Americans and to protect them from abuse  
8 by other Americans, as well as to continue supporting overthrow of the Qing Dynasty from afar. Over  
9 the years, CKT developed both positive legal community functions and activities and criminal functions  
10 and activities. Some members of CKT were strictly involved in legal functions and activities of CKT.  
11 Other members were also involved in illegal activities. The CKT had chapters in many different North  
12 American cities so that there were chapters around the country and in other countries. The Hop Sing  
13 Tong in San Francisco's Chinatown, also known as "HST," similarly formed as a fraternal organization  
14 dedicated to the community of Chinese immigrants and Chinese Americans. The HST also maintained  
15 chapters in other North American cities. Over the years, the HST also developed both positive legal  
16 community functions and activities and criminal functions and activities. The CKT acted as an  
17 "umbrella" organization in relation to the HST such that the Dragonhead of the CKT had influence over  
18 the leadership and activities of the HST.

19 2. There were leaders of CKT. The Dragonhead of CKT was feared and respected, and the  
20 directions from the Dragonhead were followed by other members. There was a President, Vice  
21 Presidents, Directors, Supervisors, Secretaries, Officers of Finance, Society Head, Consultants, and  
22 other positions. There were leaders or "bosses," sometimes referred to as "Dai Lo," literally referring to  
23 "big brother" but signifying a boss within CKT. Below the leaders were "soldiers," those members who  
24 have been prepared and known to commit violence on behalf of the group and to protect each other.  
25 There were also CKT members who dealt narcotics or engaged in other forms of criminal activity.  
26 There were also associates of CKT who were not members, but who engaged with the members in  
27 conducting certain illegal activities. There were also leaders and officers of the HST. The Dragonhead  
28

1 of the CKT, as an umbrella organization to the HST, held a position of influence in the selection of  
2 leaders for the HST and in the activities of the HST. At one time, the Dragonhead of the CKT also held  
3 the leadership position of the HST. Some individuals were members of both Tongs. In or about August  
4 2006, KWOK CHEUNG CHOW, a/k/a "Raymond Chow," a/k/a "Hai Jai," a/k/a "Shrimpboy," became  
5 the Dragonhead of the CKT.

6 3. Leaders, members, and associates of the CKT and HST constituted an "enterprise" as  
7 defined in Title 18, United States Code, Section 1959 (b)(2) and 1961(4), that is, a group of individuals  
8 associated in fact that was engaged in, and whose activities affected, interstate and foreign commerce.  
9 The enterprise (hereafter collectively referred to as "CKT") constituted an ongoing organization whose  
10 members functioned as a continuing unit that had a common purpose of achieving the objectives of the  
11 enterprise. Members and associates of the enterprise included, but were not limited to: KWOK  
12 CHEUNG CHOW, a/k/a "Raymond Chow," a/k/a "Hai Jai," a/k/a "Shrimpboy," GEORGE NIEH,  
13 KEITH JACKSON; KEVIN SIU; ALAN CHIU; KONGPHET CHANTHAVONG; XIAO CHENG  
14 MEI, a/k/a "Michael Mei"; BRANDON JAMELLE JACKSON; MARLON DARELL SULLIVAN;  
15 ANDY LI, a/k/a "Andy Man Lai Li"; LESLIE YUN, a/k/a "Leslie Yungcheung"; YAT WA PAU, a/k/a  
16 "James Pau"; TINA YAO GUI LIANG; HUAN MING MA, a/k/a "Ming Ma," a/k/a Baak Ban";  
17 ALBERT NHINGSAVATH; SERGE GEE; and XIU YING LING LIANG, a/k/a "Elaine Liang."

18 4. Some members of CKT received titles and corresponding Triad numbers. The Triads  
19 were international criminal organizations based in China. Examples include the "Dragonhead" or  
20 "General" with a corresponding number of "489"; "red pole" or "red stick," or "enforcer" or "soldier"  
21 with a corresponding number of "426"; "white paper fan," or "organizer," with a corresponding number  
22 of "415"; and ordinary or normal members with a corresponding number of "49." Members of the CKT  
23 with corresponding Triad numbers were familiar with Triad handshakes and hand signs used to identify  
24 other individuals with Triad status.

25 5. Members of CKT were expected to protect the name, reputation, and status of the group  
26 and its individual members from harm, insult, or disrespect by members of rival groups and other  
27 persons. CKT members required that all individuals show respect and deference to the group, its  
28

1 membership and associates. To protect the group and to enhance its reputation, CKT members were  
2 expected to use any means necessary to force respect from those who showed disrespect, including acts  
3 of intimidation and violence.

4 6. Members of CKT engaged in criminal activity, including narcotics distribution, assault,  
5 robbery, extortion, collection of unlawful debt, murder for hire, money laundering, trafficking in stolen  
6 goods, illegal firearms possession, and obstruction of justice. CKT members committed and threatened  
7 to commit acts of violence to maintain and enhance membership and discipline within the enterprise,  
8 including violence against rival group members, those perceived to be rival group members, rivals in  
9 general, those who disrespected or committed violence against CKT members, as well as CKT members  
10 and associates who violated the rules of the enterprise.

11 7. CKT members communicated about activities with other CKT members using mobile  
12 telephones, telephone text messages, and other modes of electronic and wire communications.

13 Purposes of the Enterprise

14 8. The purposes of the CKT enterprise, including its members and associates, included, but  
15 were not limited to, the following:

16 a. Preserving and protecting the power, territory, reputation, and profits of the enterprise, its  
17 members, and associates, through the use of security, intimidation, violence, threats of violence, and  
18 assaults;

19 b. Organizing and carrying out shows of strength and intimidation, assaults, and other  
20 violence when perceived as necessary for the good of the enterprise and members and associates of the  
21 enterprise;

22 c. Promoting and enhancing the enterprise and the activities of its members and associates,  
23 including, but not limited to, murder, narcotics trafficking, trafficking in stolen goods, trafficking in  
24 contraband cigarettes, firearms trafficking, money laundering, extortion, and other criminal activities;

25 d. Providing financial support and information to CKT members;

26 e. Maintaining peace and stability between CKT members by resolving disputes between  
27 members; and

28

1 f. Providing assistance to other CKT members who committed crimes for and on behalf of  
2 the group, to hinder, obstruct, and prevent law enforcement officers from identifying the offenders,  
3 apprehending the offenders, and successfully prosecuting and punishing the offenders.

4 The Means and Methods of the Enterprise

5 9. The means and methods by which the defendants and other members and associates of  
6 the CKT conducted and participated in the conduct of the affairs of CKT included, but were not limited  
7 to:

8 a. Members and associates of CKT protected and expanded the enterprise's criminal  
9 operation by committing, attempting, and threatening to commit violence, including murder, solicitation  
10 to commit murder, assaults, intimidation, and threats of violence directed against those who would act  
11 against CKT and its members and associates;

12 b. Members of CKT promoted a climate of fear through intimidation, violence, and threats  
13 of violence intended to promote the authority of the enterprise and its members and associates and  
14 insulate its members and associates from prosecution for the criminal actions of the enterprise; and

15 c. Members and associates of CKT used the enterprise to commit criminal activities on  
16 behalf of the enterprise and its members and associates.

17 10. It was part of the means and methods of the enterprise that the defendants and other  
18 members and associates of CKT discussed with other members and associates of CKT, among other  
19 things, the membership and rules of CKT; the status of CKT members and associates to the enterprise;  
20 the disciplining of CKT members; CKT members' encounters with law enforcement; plans and  
21 agreements regarding the commission of future crimes, including murder, solicitation to commit murder,  
22 extortion, narcotics trafficking, trafficking in stolen goods, trafficking in contraband cigarettes, money  
23 laundering, illegal possession of firearms, pimping, and assault, as well as ways to conceal these crimes;  
24 and the enforcement of the rules of CKT.

25 11. It was further part of the means and methods of the enterprise that the defendants and  
26 other members and associates of CKT agreed that acts of violence, including murder, threats, and  
27 assault, would be committed by members and associates of CKT against those who would do harm to  
28

1 their members and associates, and others when it suited the enterprise's purposes.

2 12. It was further part of the means and methods of the enterprise that the defendants and  
3 other members and associates of CKT agreed to distribute narcotics, to commit robbery, extortion,  
4 trafficking in stolen property, trafficking in contraband cigarettes, money laundering, murder for hire,  
5 pimping, and other crimes, and to conceal their criminal activities by obstructing justice, threatening and  
6 intimidating witnesses, and other means.

7 The Racketeering Conspiracy

8 13. Beginning on a date unknown to the Grand Jury but since at least 2005, and continuing  
9 up through and including the present, in the Northern District of California and elsewhere, the  
10 defendant,

11 KWOK CHEUNG CHOW,  
12 a/k/a "Raymond Chow,"  
13 a/k/a "Ha Jai,"  
14 a/k/a "Shrimpboy,"

15 together with others known and unknown to the Grand Jury, each being a person employed by and  
16 associated with CKT, an enterprise engaged in, and the activities of which affected, interstate and  
17 foreign commerce, unlawfully, knowingly, and intentionally did conspire to violate Title 18, United  
18 States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of  
19 the affairs of the CKT enterprise through a pattern of racketeering activity, as defined in Title 18, United  
20 States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of:

- 21 a. multiple acts involving dealing in controlled substances, in violation of 21 U.S.C.  
22 Sections 841(a)(1) and 846;  
23 b. multiple acts indictable under 18 U.S.C. Section 894 (extortionate collection of unlawful  
24 debt);  
25 c. multiple acts indictable under 18 U.S.C. Section 1956 (money laundering);  
26 d. multiple acts indictable under 18 U.S.C. Sections 2314 and 2315 (interstate sale of stolen  
27 property and receipt of property stolen in interstate commerce);  
28 e. multiple acts indictable under 18 U.S.C. Sections 2342 and 2344 (dealing in contraband

1 cigarettes);

2 f. multiple acts indictable under 18 U.S.C. Section 1958 (murder for hire); and

3 g. multiple acts involving murder in violation of Cal. PC Sections 187, 188, 189 and 182.

4 14. It was part of the conspiracy that each defendant agreed that a conspirator would commit  
5 at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

6 Means and Methods of the Conspiracy

7 15. The means and methods by which the defendants and other members and associates of  
8 the CKT conducted and participated in the conspiracy included, but were not limited to:

9 a. Manufacturing, distributing, and possessing with intent to distribute narcotics including  
10 cocaine, heroin, and marijuana. Manufacturing included setting up houses and warehouses as locations  
11 to grow marijuana. Distribution included distribution both inside and outside of California.

12 b. Laundering money believed to be the proceeds of specified unlawful activity including  
13 from narcotics trafficking and gambling. Laundering the money included making deposits of cash into  
14 business or personal accounts and then transferring the money back to the original owner of the money  
15 through wire transfers and checks.

16 c. Laundering money from narcotics trafficking in order to get the money from the East  
17 Coast back to California. Laundering the money included delivering cash on the East Coast and  
18 receiving laundered cash in California.

19 d. Offering to collect unlawful debts through threats and violence.

20 e. Offering to purchase and purchasing property believed to have been stolen for resale.

21 f. Offering to purchase and purchasing contraband cigarettes for resale.

22 g. Solicitation and commission of murders, as well as offering to commit murder for  
23 payment of money.

24 h. Selling firearms and ammunition without a license.

25 i. Selling ballistic vests.

26 j. Possessing and carrying firearms by convicted felons including for protection of  
27 members and associates of the enterprise and for protection of other criminal activities.

28

1 k. Selling illegal and fraudulent access devices.

2 l. Making introductions of members, associates, and other individuals for the purpose of  
3 committing the criminal activities listed above, and otherwise facilitating the criminal activities listed  
4 above in exchange for payment.

5 All in violation of Title 18, United States Code, Section 1962(d).

6  
7 COUNT TWO: (18 U.S.C. § 1959(a)(1) – Murder in Aid of Racketeering)

8 1. The allegations contained in paragraphs 1 through 12 of Count One are repeated and  
9 realleged as though fully set forth here.

10 2. The CKT enterprise, through its members and associates, engaged in racketeering activity, as  
11 defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving  
12 dealing in controlled substances, in violation of 21 U.S.C. Sections 841(a)(1) and 846; multiple acts  
13 indictable under 18 U.S.C. Section 894 (extortionate collection of unlawful debt); multiple acts  
14 indictable under 18 U.S.C. Section 1956 (money laundering); multiple acts indictable under 18 U.S.C.  
15 Sections 2314 and 2315 (interstate sale of stolen property and receipt of property stolen in interstate  
16 commerce); multiple acts indictable under 18 U.S.C. Sections 2342 and 2344 (dealing in contraband  
17 cigarettes); multiple acts indictable under 18 U.S.C. Section 1958 (murder for hire); and multiple acts  
18 involving murder in violation of Cal. Penal Code Sections 187, 188, 189 and 182.

19 3. On or about February 27, 2006, in the Northern District of California, as consideration for  
20 the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value  
21 from the CKT, and for the purpose of gaining entrance to and maintaining and increasing position in the  
22 CKT, an enterprise engaged in racketeering activity, the defendant,

23 KWOK CHEUNG CHOW,  
24 a/k/a "Raymond Chow,"  
25 a/k/a "Ha Jai,"  
a/k/a "Shrimpboy,"

26 together with others known and unknown to the Grand Jury, and aided and abetted each by the other, did  
27 unlawfully, knowingly, and intentionally, and with malice aforethought, commit and cause the murder  
28

1 of Allen Leung, in violation of California Penal Code Sections 187, 188, 189 and 182.

2 All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

3 COUNT THREE: (18 U.S.C. § 1959(a)(5) – Conspiracy to Commit Murder in Aid of Racketeering  
4 of Jim Tat Kong)

5 1. The allegations contained in paragraphs 1 and 2 of Count Two are hereby repeated and  
6 realleged as though fully set forth here.

7 2. On or about and between November 2011 and October 17, 2013, in the Northern District of  
8 California and elsewhere, as consideration for the receipt of, and as consideration for a promise and  
9 agreement to pay, anything of pecuniary value from the CKT, and for the purpose of gaining entrance to  
10 and maintaining and increasing position in the CKT, an enterprise engaged in racketeering activity, the  
11 defendant,

12 KWOK CHEUNG CHOW,  
13 a/k/a "Raymond Chow,"  
14 a/k/a "Ha Jai,"  
15 a/k/a "Shrimpboy,"

16 together with others known and unknown to the Grand Jury, did unlawfully, knowingly, and  
17 intentionally conspire to commit the murder of Jim Tat Kong, a/k/a "Jimmy," in violation of California  
18 Penal Code Sections 187, 188, 189 and 182.

19 All in violation of Title 18, United States Code, Section 1959(a)(5).

20 COUNTS 4-133: (18 U.S.C. § 1956(a)(3)(A) and (B) -- Money Laundering)

21 1. The allegations contained in paragraphs 1 through 12 are repeated and realleged as  
22 though fully set forth here.

23 2. On or about the dates set forth below, in the Northern District of California, the defendant,

24 KWOK CHEUNG CHOW,  
25 a/k/a "Raymond Chow,"  
26 a/k/a "Ha Jai,"  
27 a/k/a "Shrimpboy,"

1 with the intent to promote the carrying on of specified unlawful activity, and with the intent to conceal  
 2 and disguise the nature, location, source, ownership, and control of property believed to be the proceeds  
 3 of specified unlawful activity, did knowingly conduct and attempt to conduct financial transactions  
 4 affecting interstate and foreign commerce involving property represented by a law enforcement officer  
 5 to be proceeds of specified unlawful activity and property used to conduct or facilitate specified  
 6 unlawful activity, to wit:

Count	Date	Amount	Description of Financial Transaction
4	3/19/2011	\$22,000	Receipt of \$22,000 in cash by Kevin SIU
5	3/19/2011	\$22,000	Receipt of \$22,000 in cash by George NIEH
6	3/25/2011	\$20,000	Payment of \$20,000 check by NIEH
7	3/25/2011	\$20,000	Wire transfer \$20,000 by SIU
8	4/12/2011	\$44,000	Receipt of \$44,000 in cash by SIU
9	4/13/2011	\$44,000	Receipt of \$44,000 in cash by NIEH
10	4/20/2011	\$15,000	Payment of \$15,000 check by NIEH
11	4/20/2011	\$15,000	Payment of \$15,000 check by NIEH
12	4/20/2011	\$10,000	Payment of \$10,000 check by NIEH
13	4/25/2011	\$40,000	Wire transfer of \$40,000 by SIU
14	5/4/2011	\$66,000	Receipt of \$66,000 in cash by NIEH
15	5/9/2011	\$20,000	Payment of \$20,000 check by NIEH
16	5/11/2011	\$20,000	Payment of \$20,000 check by NIEH
17	5/13/2011	\$20,000	Payment of \$20,000 check by NIEH
18	5/26/2011	\$110,000	Receipt of \$110,000 in cash by NIEH
19	5/26/2011	\$55,000	Receipt of \$50,000 in cash by SIU
20	6/1/2011	\$25,000	Payment of \$25,000 check by NIEH
21	6/1/2011	\$25,000	Payment of \$25,000 check by NIEH
22	6/2/2011	\$50,000	Wire transfer of \$50,000 by SIU
23	6/3/2011	\$25,000	Payment of \$25,000 check by NIEH
24	6/7/2011	\$25,000	Wire transfer of \$25,000 by NIEH
25	6/16/2011	\$110,000	Receipt of \$110,000 in cash by NIEH
26	6/16/2011	\$66,000	Receipt of \$66,000 in cash by SIU
27	6/22/2011	\$25,000	Payment of \$25,000 check by NIEH
28	6/22/2011	\$25,000	Payment of \$25,000 check by NIEH
29	6/22/2011	\$60,000	Wire transfer of \$60,000 by SIU
30	6/24/2011	\$25,000	Payment of \$25,000 check by NIEH
31	6/24/2011	\$25,000	Payment of \$25,000 check by NIEH
32	7/14/2011	\$132,000	Receipt of \$132,000 in cash by NIEH
33	7/20/2011	\$30,000	Payment of \$30,000 check by NIEH
34	7/20/2011	\$30,000	Payment of \$30,000 check by NIEH
35	7/23/2011	\$30,000	Payment of \$30,000 check by NIEH
36	7/23/2011	\$30,000	Payment of \$30,000 check by NIEH
37	8/1/11	\$110,000	Receipt of \$110,000 in cash by NIEH
38	8/1/11	\$33,000	Receipt of \$33,000 in cash by Alan CHIU
39	8/5/11	\$8,000	Payment of \$8,000 check by CHIU
40	8/5/11	\$8,000	Payment of \$9,000 check by CHIU
41	8/5/11	\$8,000	Payment of \$7,000 check by CHIU
42	8/9/11	\$30,000	Payment of \$30,000 check by NIEH

1	43	8/9/11	\$20,000	Payment of \$20,000 check by NIEH
	44	8/11/11	\$30,000	Payment of \$30,000 check by NIEH
2	45	8/11/11	\$20,000	Payment of \$20,000 check by NIEH
	46	8/17/11	\$6,000	Payment of \$6,000 check by CHIU
3	47	9/22/11	\$132,000	Receipt of \$132,000 in cash by NIEH
	48	9/22/11	\$66,000	Receipt of \$66,000 in cash by CHIU
4	49	9/29/11	\$30,000	Payment of \$30,000 check by NIEH
	50	9/29/11	\$30,000	Payment of \$30,000 check by NIEH
5	51	10/1/11	\$30,000	Payment of \$30,000 check by NIEH
	52	10/1/11	\$30,000	Payment of \$30,000 check by NIEH
6	53	10/4/11	\$60,000	Wire transfer of \$60,000 by CHIU
	54	10/19/2011	\$132,000	Receipt of \$132,000 in cash by NIEH
7	55	10/19/2011	\$44,000	Receipt of \$44,000 in cash by CHIU
	56	10/24/2011	\$40,000	Wire transfer of \$40,000 by CHIU
8	57	10/28/2011	\$30,000	Payment of \$30,000 check by NIEH
	58	10/28/2011	\$30,000	Payment of \$30,000 check by NIEH
9	59	10/31/2011	\$30,000	Payment of \$30,000 check by NIEH
	60	10/31/2011	\$30,000	Payment of \$30,000 check by NIEH
10	61	11/17/2011	\$88,000	Receipt of \$88,000 in cash by NIEH
	62	11/23/2011	\$20,000	Payment of \$20,000 check by NIEH
11	63	11/23/2011	\$20,000	Payment of \$20,000 check by NIEH
	64	11/25/2011	\$20,000	Payment of \$20,000 check by NIEH
12	65	11/25/2011	\$20,000	Payment of \$20,000 check by NIEH
	66	12/13/2011	\$88,000	Receipt of \$88,000 in cash by NIEH
13	67	12/13/2011	\$22,000	Receipt of \$22,000 in cash by CHIU
	68	12/21/2011	\$20,000	Wire transfer of \$20,000 by CHIU
14	69	12/21/2011	\$20,000	Payment of \$20,000 check by NIEH
	70	12/21/2011	\$20,000	Payment of \$20,000 check by NIEH
15	71	12/23/2011	\$20,000	Payment of \$20,000 check by NIEH
	72	12/23/2011	\$20,000	Payment of \$20,000 check by NIEH
16	73	1/25/2012	\$77,000	Receipt of \$77,000 in cash by NIEH
	74	2/3/2012	\$35,000	Payment of \$35,000 check by NIEH
17	75	2/3/2012	\$35,000	Payment of \$35,000 check by NIEH
	76	2/13/2012	\$66,000	Receipt of \$66,000 in cash by NIEH
18	77	2/13/2012	\$22,000	Receipt of \$22,000 in cash by CHIU
	78	2/21/2012	\$20,000	Wire transfer of \$20,000 by CHIU
19	79	2/17/2012	\$30,000	Payment of \$30,000 check by NIEH
	80	2/17/2012	\$30,000	Payment of \$30,000 check by NIEH
20	81	4/19/2012	\$77,000	Receipt of \$77,000 in cash by NIEH
	82	4/27/2012	\$35,000	Payment of \$35,000 check by NIEH
21	83	4/27/2012	\$35,000	Payment of \$35,000 check by NIEH
	84	5/10/2012	\$66,000	Receipt of \$66,000 in cash by NIEH
22	85	5/17/2012	\$30,000	Payment of \$30,000 check by NIEH
	86	5/17/2012	\$30,000	Payment of \$30,000 check by NIEH
23	87	5/16/2012	\$33,000	Receipt of \$33,000 in cash by YUN
	88	5/22/2012	\$30,000	Wire transfer of \$30,000 by YUN
24	89	6/20/2012	\$66,000	Receipt of \$66,000 in cash by NIEH
	90	6/20/2012	\$66,000	Receipt of \$66,000 in cash by YUN
25	91	6/22/2012	\$20,000	Payment of \$20,000 check by YUN
	92	6/28/2012	\$30,000	Payment of \$30,000 check by NIEH
26	93	6/28/2012	\$30,000	Payment of \$30,000 check by NIEH
	94	6/26/2012	\$20,000	Wire transfer of \$20,000 by YUN
27				
28				

1	95	6/27/2012	\$10,000	Wire transfer of \$10,000 by YUN
	96	6/27/2012	\$10,000	Wire transfer of \$10,000 by YUN
2	97	8/16/12	\$66,000	Receipt of \$66,000 in cash by NIEH
	98	8/16/12	\$66,000	Receipt of \$66,000 in cash by YUN
3	99	8/22/12	\$18,000	Payment of \$18,000 check by PAU
	100	8/24/12	\$30,000	Payment of \$30,000 check by NIEH
4	101	8/24/12	\$30,000	Payment of \$30,000 check by NIEH
	102	8/27/12	\$15,000	Payment of \$15,000 check by YUN
5	103	8/31/12	\$17,000	Payment of \$17,000 check by YUN
	104	9/4/12	\$10,000	Payment of \$10,000 check by YUN
6	105	10/11/2012	\$66,000	Receipt of \$66,000 in cash by NIEH
	106	10/11/2012	\$66,000	Receipt of \$66,000 in cash by YUN
7	107	10/11/2012	\$12,000	Payment of \$12,000 check by YUN
	108	10/12/2012	\$15,000	Payment of \$15,000 check by YUN
8	109	10/17/2012	\$15,000	Payment of \$15,000 check by YUN
	110	10/19/2012	\$9,000	Payment of \$9,000 check by YUN
9	111	10/19/2012	\$30,000	Payment of \$30,000 check by NIEH
	112	10/19/2012	\$30,000	Payment of \$30,000 check by NIEH
10	113	10/24/2012	\$9,000	Payment of \$9,000 check by YUN
	114	12/12/2012	\$77,000	Receipt of \$77,000 in cash by NIEH
11	115	12/19/2012	\$20,000	Payment of \$20,000 check by NIEH
	116	12/21/2012	\$20,000	Payment of \$20,000 check by NIEH
12	117	12/21/2012	\$10,000	Wire transfer of \$10,000 by NIEH
	118	12/21/2012	\$20,000	Two wire transfers of \$10,000 each by NIEH
13	119	2/14/2013	\$88,000	Receipt of \$88,000 in cash by NIEH
	120	2/22/2013	\$20,000	Payment of \$20,000 check by NIEH
14	121	2/22/2013	\$20,000	Payment of \$20,000 check by NIEH
	122	2/26/2013	\$20,000	Wire transfer of \$20,000 by NIEH
15	123	2/26-28/2013	\$20,000	Two wire transfers of \$10,000 each by NIEH
	124	4/11/2013	\$77,000	Receipt of \$77,000 by NIEH
16	125	4/11/2013	\$33,000	Receipt of \$33,000 by YUN
	126	4/12/2013	\$9,000	Payment of \$9,000 check by YUN
17	127	4/17/2013	\$12,000	Payment of \$12,000 check by YUN
	128	4/19/2013	\$9,000	Payment of \$9,000 check by YUN
18	129	4/19/2013	\$35,000	Payment of \$35,000 check by NIEH
	130	4/19/2013	\$35,000	Payment of \$35,000 check by NIEH
19	131	6/13/13	\$77,000	Receipt of \$77,000 in cash by NIEH
	132	6/22/13	\$35,000	Payment of \$35,000 check by NIEH
20	133	6/22/13	\$35,000	Payment of \$35,000 check by NIEH
21				

22 All in violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B) and Section 2.

23 COUNT 134: (18 U.S.C. § 371 – Conspiracy)

24 1. The allegations contained in paragraphs 1 through 12 of Count One are repeated and  
25 realleged as though fully set forth here.

26 2. Between on or about December 13, 2011, through and including on or about March 13,  
27 2012, in the Northern District of California, and elsewhere, the defendant,

1 KWOK CHEUNG CHOW,  
2 a/k/a "Raymond Chow,"  
3 a/k/a "Ha Jai,"  
4 a/k/a "Shrimpboy,"

5 knowingly and willfully conspired and agreed with others, known and unknown to the Grand Jury, to  
6 commit offenses against the United States: that is,

- 7 (1) to receive, possess, store, sell, and dispose of property, that is, 50 cases of Hennessey XO  
8 alcohol, of a value of \$5,000 or more which had crossed a State boundary after being stolen and  
9 subsequently brought into the State of California, knowing the same to have been stolen, in  
10 violation of Title 18, United States Code, Section 2315; and  
11 (2) to transport, transmit, and transfer in interstate and foreign commerce from the State of  
12 California to a location outside of the United States, stolen goods, wares and merchandise, that  
13 is, 50 cases of Hennessey XO alcohol, of the value of \$5,000 or more, knowing the same to have  
14 been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section  
15 2314.

16 OVERT ACTS

- 17 3. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following  
18 overt acts, among others, were committed in the Northern District of California and elsewhere:  
19 a. On or about December 13, 2011, the defendant RAYMOND CHOW discussed selling stolen  
20 liquor with an undercover employee;  
21 b. On or about January 23, 2012, the defendant RAYMOND CHOW and GEORGE NIEH  
22 discussed selling stolen liquor with an undercover employee and indicated that TINA LIANG  
23 would arrange buyers in China;  
24 c. On or about January 25, 2012, GEORGE NIEH discussed selling stolen liquor with an  
25 undercover employee;  
26 d. On or about February 6, 2012, JANE LIANG discussed selling stolen liquor with an  
27 undercover employee;  
28 e. On or about February 16, 2012, the defendant RAYMOND CHOW discussed selling stolen

1 liquor to TINA LIANG with an undercover employee;

2 f. On or about March 5, 2012, GEORGE NIEH and TINA LIANG met with an undercover  
3 employee to discuss selling stolen liquor;

4 g. On or about March 9, 2012, TINA LIANG and BRYAN TILTON purchased purportedly  
5 stolen liquor from an undercover employee.

6 h. On or about March 13, 2012, the defendant RAYMOND CHOW received payment for this  
7 transaction.

8 All in violation of Title 18, United States Code, Section 371.

9  
10 COUNT 135: (18 U.S.C. § 371 – Conspiracy)

11 1. The allegations contained in paragraphs 1 through 12 of Count One are repeated and  
12 realleged as though fully set forth here.

13 2. Between on or about June 20, 2012, through and including on or about September 19, 2012,  
14 in the Northern District of California, and elsewhere, the defendant,

15 KWOK CHEUNG CHOW,  
16 a/k/a "Raymond Chow,"  
17 a/k/a "Ha Jai,"  
a/k/a "Shrimpboy,"

18 knowingly and willfully conspired and agreed with others, known and unknown to the Grand Jury, to  
19 commit offenses against the United States: that is, to receive, possess, store, sell, and dispose of  
20 property, that is, 27 cases of Johnnie Walker Blue Label Scotch Whiskey alcohol, of a value of \$5,000  
21 or more, which had crossed a State boundary after being stolen and subsequently brought into the State  
22 of California, knowing the same to have been stolen, in violation of Title 18, United States Code,  
23 Section 2315.

24 OVERT ACTS

25 3. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following  
26 overt acts, among others, were committed in the Northern District of California and elsewhere:

27 a. On or about June 20, 2012, GEORGE NIEH discussed selling stolen liquor with an undercover  
28

1 employee;

- 2 b. On or about June 27, 2012, GEORGE NIEH, MING MA, and HON SO met at a restaurant so  
3 that MA and SO could purchase 12 cases of purportedly stolen Johnnie Walker Blue Label  
4 Scotch for \$6,480;
- 5 c. On or about June 27, 2012, the defendant RAYMOND CHOW accepted payment for facilitating  
6 the liquor sale;
- 7 d. On or about July 19, 2012, GEORGE NIEH discussed selling stolen liquor with an undercover  
8 employee;
- 9 e. On or about August 16, 2012, GEORGE NIEH discussed selling stolen liquor with an  
10 undercover employee;
- 11 f. On or about September 8, 2012, GEORGE NIEH and MING MA discussed selling stolen liquor  
12 with an undercover employee;
- 13 g. On or about September 10, 2012, GEORGE NIEH, MING MA, and HON SO met at a restaurant  
14 so that MA and SO could purchase 15 cases of purportedly stolen liquor for \$8,100;
- 15 h. On or about September 19, 2012, the defendant RAYMOND CHOW and GEORGE NIEH  
16 accepted payment for facilitating the liquor sale.

17 All in violation of Title 18, United States Code, Section 371.

18  
19 COUNT 136: (18 U.S.C. § 371 – Conspiracy)

20 1. The allegations contained in paragraphs 1 through 12 of Count One are repeated and  
21 realleged as though fully set forth here.

22 2. From on or between July 19, 2012, to August 16, 2012, in the Northern District of California,  
23 and elsewhere, the defendant,

24 KWOK CHEUNG CHOW,  
25 a/k/a "Raymond Chow,"  
26 a/k/a "Ha Jai,"  
27 a/k/a "Shrimpboy,"

28 knowingly and willfully conspired and agreed with others, known and unknown to the Grand Jury, to

1 commit offenses against the United States: that is,

2 (1) to receive, possess, store, sell, and dispose of property, that is, a quantity of more than 10,000  
3 cigarettes, of a value of \$5,000 or more which had crossed a State boundary after being stolen,  
4 knowing the same to have been stolen, in violation of Title 18, United States Code, Section  
5 2315; and

6 (2) to knowingly receive, possess, sell, distribute, and purchase contraband cigarettes, as that term is  
7 defined in Title 18, United States Code, Section 2341, to wit: a quantity of more than 10,000  
8 Marlboro cigarettes which bore no evidence of the payment of applicable State cigarette taxes in  
9 the State of New York, in violation of Title 18, United States Code, Section 2342(a) and 2344.

10 OVERT ACTS

11 3. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following  
12 overt acts, among others, were committed in the Northern District of California and elsewhere:

- 13 a. On or about July 19, 2012, GEORGE NIEH discussed with LESLIE YUN the sale of stolen  
14 cigarettes by an undercover employee.
- 15 b. On or about July 26, 2012, NIEH and YUN met with the undercover employee to coordinate the  
16 sale of stolen cigarettes. In particular, YUN instructed the undercover employee to deliver a  
17 sample of cigarettes, and that if the sample were acceptable, the full transaction would take  
18 place.
- 19 c. On or about August 3, 2012, NIEH and YUN again met with the undercover employee to  
20 discuss travel plans and logistics for the transaction. YUN wanted to know what brand the  
21 cigarettes were, and advised that her buyers would pay the undercover employee in \$20  
22 denominations.
- 23 d. On or about August 9, 2012, YUN gave the undercover employee \$96,010 for the purportedly  
24 stolen and contraband cigarettes. The cigarettes were delivered by undercover employees to an  
25 address in Brooklyn, New York, identified by YUN and her associates.
- 26 e. On or about August 16, 2012, the defendant CHOW and NIEH accepted payment for their role in  
27 facilitating the sale of the cigarettes.
- 28

1 All in violation of Title 18, United States Code, Section 371.

2 COUNT 137: (18 U.S.C. § 371 – Conspiracy)

3 1. The allegations contained in paragraphs 1 through 12 of Count One are repeated and  
4 realleged as though fully set forth here.

5 2. From on or about December 17, 2013, to January 16, 2013, in the Northern District of  
6 California, and elsewhere, the defendant,

7 KWOK CHEUNG CHOW,  
8 a/k/a "Raymond Chow,"  
9 a/k/a "Ha Jai,"  
10 a/k/a "Shrimpboy,"

11 knowingly and willfully conspired and agreed with others, known and unknown to the Grand Jury, to  
12 commit offenses against the United States: that is,

13 (1) to receive, possess, store, sell, and dispose of property, that is, a quantity of more than 10,000  
14 cigarettes, of a value of \$5,000 or more which had crossed a State boundary after being stolen,  
15 knowing the same to have been stolen, in violation of Title 18, United States Code, Section  
16 2315; and

17 (2) to knowingly receive, possess, sell, distribute, and purchase contraband cigarettes, as that term is  
18 defined in Title 18, United States Code, Section 2341, to wit: a quantity of more than 10,000  
19 Marlboro cigarettes which bore no evidence of the payment of applicable State cigarette taxes in  
20 the State of New York, in violation of Title 18, United States Code, Section 2342(a) and 2344.

21 OVERT ACTS

22 3. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following  
23 overt acts, among others, were committed in the Northern District of California and elsewhere:

24 a. On or about December 17, 2012, LESLIE YUN discussed with GEORGE NIEH and an  
25 undercover employee a proposed sale of stolen cigarettes by the undercover employee on  
26 January 10, 2013;

27 b. On or about January 7, 2013, YUN and NIEH met again with the undercover employee to  
28 coordinate the sale of stolen cigarettes. In particular, YUN and the undercover employee agreed  
to meet in a hotel in Flushing, New York; once the undercover employee received payment, the

1 undercover employee would provide YUN with the code and key to access a storage unit where  
2 the purportedly stolen cigarettes were held.

3 c. On or about January 10, 2013, James PAU visited a storage unit in Flushing, New York, with  
4 undercover employees to inspect cartons of purportedly stolen cigarettes. ZHANGHAO WU,  
5 YUN, and PAU subsequently gave undercover employees \$173,000 in exchange for the  
6 purportedly stolen cigarettes.

7 d. On or about January 16, 2013, the defendant CHOW and NIEH accepted payment for their role  
8 in facilitating the sale of the cigarettes.

9 All in violation of Title 18, United States Code, Section 371.

10  
11 COUNT 138: (18 U.S.C. § 371 – Conspiracy)

12 1. The allegations contained in paragraphs 1 through 12 of Count One are repeated and  
13 realleged as though fully set forth here.

14 2. From on or between June 19, 2013, to July 23, 2013, in the Northern District of California,  
15 and elsewhere, the defendant,

16 KWOK CHEUNG CHOW,  
17 a/k/a "Raymond Chow,"  
18 a/k/a "Ha Jai,"  
19 a/k/a "Shrimpboy,"

20 knowingly and willfully conspired and agreed with others, known and unknown to the Grand Jury, to  
21 commit offenses against the United States: that is,

22 (1) to receive, possess, store, sell, and dispose of property, that is, a quantity of more than 10,000  
23 cigarettes, of a value of \$5,000 or more which had crossed a State boundary after being stolen,  
24 knowing the same to have been stolen, in violation of Title 18, United States Code, Section  
25 2315; and

26 (2) to knowingly receive, possess, sell, distribute, and purchase contraband cigarettes, as that term is  
27 defined in Title 18, United States Code, Section 2341, to wit: a quantity of more than 10,000  
28 Marlboro cigarettes which bore no evidence of the payment of applicable State cigarette taxes in

1 the State of New York, in violation of Title 18, United States Code, Sections 2342(a) and 2344.

2 OVERT ACTS

- 3 3. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following  
4 overt acts, among others, were committed in the Northern District of California and elsewhere:
- 5 a. On or about June 19, 2013, the defendant RAYMOND CHOW discussed with JAMES PAU  
6 and LESLIE YUN facilitating the sale of stolen cigarettes with an undercover employee;
  - 7 b. On or about July 18, 2013, JAMES PAU and LESLIE YUN met with an undercover  
8 employee to arrange sales of stolen and contraband cigarettes to buyers, including  
9 ZHANGHAO WU and TONG ZAO ZHANG;
  - 10 c. On or about July 18, 2013, YUN and PAU gave the undercover employee \$150,000 for the  
11 purportedly stolen and contraband cigarettes, which was \$17,900 less than the agreed upon  
12 price;
  - 13 d. On or about July 23, 2013, GEORGE NIEH gave the undercover employee the remaining  
14 \$17,900 for the sale of the cigarettes;
  - 15 e. On or about July 23, 2013, the defendant RAYMOND CHOW and GEORGE NIEH accepted  
16 payment for their role in facilitating the sale of the cigarettes.

17 All in violation of Title 18, United States Code, Section 371.

18 COUNTS 139-162 : (18 U.S.C. § 1956(a)(1)(A)(i) and (a)(1)(B)(i) – Money Laundering)

19 1. The allegations contained in paragraphs 1 through 12 of Count One are repeated and  
20 realleged as though fully set forth here.

21 2. On or about the dates described below, in the Northern District of California and elsewhere,  
22 the defendant,

23  
24 KWOK CHEUNG CHOW,  
25 a/k/a "Raymond Chow,"  
26 a/k/a "Ha Jai,"  
27 a/k/a "Shrimpboy,"  
28

1 aided and abetted by others known and unknown to the Grand Jury, did knowingly conduct and attempt  
 2 to conduct financial transactions affecting interstate and foreign commerce which involved the proceeds  
 3 of a specified unlawful activity, that is conspiracy to distribute and distribution of narcotics in violation  
 4 of Title 21, United States Code, Sections 846 and 841, with the intent to promote the carrying on of said  
 5 specified unlawful activity, and knowing that the transaction was designed in whole and in part to  
 6 conceal and disguise the nature, location, source, ownership, and proceeds of said specified unlawful  
 7 activity, and that while conducting and attempting to conduct such financial transaction, knew that the  
 8 property involved in the financial transaction represented the proceeds of some form of unlawful  
 9 activity.

Count	Date	Amount	Description of Financial Transaction
139	5/13/13	\$99,275	Delivery of \$99,275 by Norge MASTRANGELO
140	5/14/13	\$96,275	Receipt of \$96,275 by Albert NHINGSAVATH
141	8/9/2013	\$93,870	Delivery of \$93,870 in cash by Serge GEE
142	8/11/2013	\$90,180	Receipt of \$90,180 by GEE and Elaine LIANG
143	8/26/2013	\$155,900	Delivery of \$155,900 in cash by GEE
144	8/27/2013	\$149,900	Receipt of \$149,900 in cash by GEE and LIANG
145	9/3/2013	\$76,030	Delivery of \$76,030 in cash by unindicted co-conspirators
146	9/6/2013	\$73,000	Receipt of \$73,000 in cash by GEE
147	9/9/13	\$203,000	Delivery of \$203,000 in cash by unindicted co-conspirators
148	9/10/13	\$195,000	Receipt of \$195,000 in cash by GEE and LIANG
149	9/16/13	\$107,400	Delivery of \$107,400 in cash by unindicted co-conspirators
150	9/18/13	\$103,100	Receipt of \$103,100 in cash by GEE and LIANG
151	9/26/13	\$145,020	Delivery of \$145,020 in cash by unindicted co-conspirators
152	9/26/13	\$139,200	Receipt of \$139,200 by LIANG
153	10/1/2013	\$189,780	Delivery of \$189,780 by Gary Kwong Yiu CHEN
154	10/1/2013	\$182,110	Receipt of \$182,110 by GEE and Anthony John LAI
155	10/4/2013	\$150,000	Delivery of \$150,000 in cash by GEE
156	10/8/2013	\$144,000	Receipt of \$144,000 in cash by GEE
157	10/15/2013	\$102,790	Delivery of \$102,790 in cash by CHEN
158	10/15/2013	\$98,678	Receipt of \$98,678 in cash by LAI
159	10/23/2013	\$134,145	Delivery of \$134,145 by CHEN
160	10/24/2013	\$128,800	Receipt of \$128,800 by LAI
161	12/5/13	\$199,240	Delivery of \$199,240 by CHEN

162	12/6/13	\$191,270	Receipt of \$191,270 by LAI
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All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (a)(1)(B)(i), and 2.

NOTICE OF SPECIAL SENTENCING FACTORS

Number 1: Conspiracy to Commit Murder of Allen Leung

Beginning on a date unknown to the Grand Jury but in and around 2005, and continuing up through and including February 27, 2006, in the Northern District of California and elsewhere, the defendant,

KWOK CHEUNG CHOW,  
a/k/a "Raymond Chow,"  
a/k/a "Ha Jai,"  
a/k/a "Shrimpboy,"

together with others known and unknown to the Grand Jury, each being a person employed by and associated with CKT, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, knowingly, and intentionally did conspire to commit murder, in violation of California Penal Code Sections 187, 188, 189, and 182, to wit, the defendant agreed with others to kill, with malice aforethought, Allen Leung.

Number 2: First Degree Murder of Allen Leung

On or about February 27, 2006, in the Northern District of California, the defendant,

KWOK CHEUNG CHOW,  
a/k/a "Raymond Chow,"  
a/k/a "Ha Jai,"  
a/k/a "Shrimpboy,"

aided and abetted by others known and unknown to the Grand Jury, did unlawfully, willfully and intentionally and with deliberation and premeditation, kill and cause to be killed, with malice aforethought, Allen Leung, in violation of California Penal Code Sections 187, 188, and 189.

///

///

1 Number 3: Conspiracy to Commit Murder

2 Beginning on a date unknown to the Grand Jury but in and around November of 2011, and  
3 continuing up through and including October 17, 2013, in the Northern District of California and  
4 elsewhere, the defendant,

5 KWOK CHEUNG CHOW,  
6 a/k/a "Raymond Chow,"  
7 a/k/a "Ha Jai,"  
8 a/k/a "Shrimpboy,"

9 together with others known and unknown to the Grand Jury, each being a person employed by and  
10 associated with CKT, an enterprise engaged in, and the activities of which affected, interstate and  
11 foreign commerce, unlawfully, knowingly, and intentionally did conspire to commit murder, in violation  
12 of California Penal Code Sections 187, 188, 189, and 182, to wit, the defendant agreed with others to  
13 kill, with malice aforethought, Jim Tat Kong.

14 NOTICE OF SPECIAL FINDINGS AS TO KWOK CHEUNG CHOW

15 The allegations set forth in Count Two of this Third Superseding Indictment are hereby realleged  
16 as if fully set forth herein and incorporated by reference.

17 As to Count Two of this Third Superseding Indictment, the defendant,

18 KWOK CHEUNG CHOW,  
19 a/k/a "Raymond Chow,"  
20 a/k/a "Ha Jai,"  
21 a/k/a "Shrimpboy,"

- 22 (1) was 18 years of age or older at the time of the offense (Title 18, United States Code,  
23 Section 3591(a));
- 24 (2) intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));
- 25 (3) intentionally inflicted serious bodily injury that resulted in the death of the victim (Title  
26 18, United States Code, Section 3591(a)(2)(B));
- 27 (4) intentionally participated in an act, contemplating that the life of a person would be taken  
28 or intending that lethal force would be used in connection with a person, other than one of the

1 participants in the offense, and the victim died as a direct result of the act (Title 18, United States  
2 Code, Section 3591(a)(2)(C)); and

3 (5) intentionally and specifically engaged in an act of violence, knowing that the act created  
4 a grave risk of death to a person, other than one of the participants in the offense, such that  
5 participation in the act constituted reckless disregard for human life and the victim died as a  
6 direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

7 (6) in committing the offense described in Count Two of this Third Superseding Indictment,  
8 the defendant acted after substantial planning and premeditation to cause the death of a person  
9 (Title 18, United States Code, Section 3592(c)(9)); and

10 (7) at the time of the offense described in Count Two of this Third Superseding Indictment,  
11 the defendant had previously been convicted of a Federal or State offense punishable by a term  
12 of imprisonment of more than 1 year, involving the use, attempted use, and threatened use of a  
13 firearm against another person.

14 FORFEITURE ALLEGATION:

15 1. The factual allegations contained in Counts 1-163 of this Third Superseding Indictment  
16 are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging  
17 forfeiture as set forth below.

18 2. Upon conviction of the offenses alleged in Count One of this Third Superseding  
19 Indictment, the defendant,

20 KWOK CHEUNG CHOW,  
21 a/k/a "Raymond Chow,"  
22 a/k/a "Ha Jai,"  
a/k/a "Shrimpboy,"

23 shall, pursuant to 18 U.S.C. § 1963, forfeit to the United States:

- 24 a. any interest acquired or maintained in violation of section 1962;  
25 b. any interest in, security of, claim against, or property or contractual right of any  
26 kind affording a source of influence over, any enterprise which the defendant established, operated,  
27 controlled, conducted, or participated in the conduct of, in violation of section 1962; and

28

1 c. any property constituting, or derived from, any proceeds obtained, directly or  
2 indirectly, from racketeering activity or unlawful debt collection in violation of section 1962.

3 3. The property to be forfeited includes, but is not limited to:

- 4 (1) One 5.56 caliber AR-15 rifle with no serial number or manufacturer markings on  
5 lower receiver;  
6 (2) One 5.56 caliber AR-15 rifle with no serial number or manufacturer markings on  
7 lower receiver, barrel marked "5.56 NATO 1/7 CL Palmetto", "Palmetto" marked on  
8 upper receiver and stock;  
9 (3) One .44 caliber Smith and Wesson Revolver, serial number 173514 XRF# 94590;  
10 (4) One .45 caliber Sturm Ruger handgun, serial number 661-43176;  
11 (5) One .45 caliber Taurus revolver, serial number CW930492;  
12 (6) One 9MM Calico firearm, serial number J000690;  
13 (7) One AK-47 assault rifle, serial number 1983 AE4488;  
14 (8) One 9MM Luger pistol, serial number D047677;  
15 (9) One .233 caliber Bushmaster firearm, serial number CRB003689;  
16 (10) One .45 caliber Springfield pistol, serial number N450080;  
17 (11) One 9MM Luger pistol, serial number 17094;  
18 (12) One AR-15 assault rifle with attached bipod, no serial number or manufacturing  
19 stamp;  
20 (13) One 7.62 caliber SKS rifle, serial number 24023048N;  
21 (14) One 7.62 caliber Norinco firearm, serial number 8808322;  
22 (15) One 9MM Uzi semi-automatic firearm, serial number SA41977;  
23 (16) One 9MM M-11 S.M.D. firearm, serial number 89-0007062;  
24 (17) One .22 caliber Ruger carbine, serial number 123-20766;  
25 (18) One Cobray pistol, with last six digits of serial number 007394;  
26 (19) One 12-gauge Mossberg shotgun, serial number MV60079C;  
27 (20) One .223 caliber Sturm Ruger rifle, serial number 580-75655;  
28 (21) One Smith and Wesson handgun, serial number A170243;  
(22) One Colt handgun, serial number SFA5458;  
(23) One 7.62 caliber Clayco Sports rifle, serial number 105211;  
(24) One 7.62 caliber SKS firearm, serial number 2697;  
(25) One 7.62 caliber AK-47 rifle, serial number CM0605639;  
(26) One .380 caliber Cobra M12;  
(27) One .22LR caliber Smith and Wesson firearm, serial number DZR2321;  
(28) One .45 caliber Ruger revolver, serial number 45-12226;  
(29) One .357 caliber Smith and Wesson revolver, serial number AYL5133;  
(30) One .22 caliber revolver, serial number 69874;  
(31) One .223 caliber Daewoo DR-200 rifle bearing serial number RA001216;  
(32) One .40 caliber Ruger SR40 handgun, serial number 342-08483;  
(33) One .380 caliber Cobra FS380 semi-automatic pistol;  
(34) One .223 caliber Aero Precision X15 rifle with an obliterated serial number;  
(35) One Beretta Model 92FS, serial number BER252848Z  
(35) Approximately 496 rounds of ammunition of various caliber including shotgun  
shells;  
(36) Approximately Twenty (20) magazines including "extended" and drum-style  
magazines for ammunition of various calibers;  
(37) One speed loader;  
(38) One blue ballistic vest with yellow marking "FBI" manufactured by Point Blank,  
model Gold Flex-6 IIIA, Style VNG052;  
(39) One white ballistic vest manufactured by ABA, model XT3A-2;  
(40) One bullet-proof vest manufactured by International Armor, Model Type 2A;

- (41) One AK-47 scope;
- (42) One silencer;
- (43) Real property and improvements located at 5555 Merritt Drive, Concord, Ca.;
- (44) \$61,280.75 in United States Currency, 3710 Thai Bhat, 3,635 Chinese Yuan, 66 Canadian Dollars, and 380 Hong Kong Dollars seized from 3430 Laguna Avenue, Apt. C, Oakland, CA on March 26, 2014;
- (45) \$228,420.00 seized from 133-43 37th Ave., Flushing, NY on March 25, 2014;
- (46) \$66,066.00 seized from 1370 24th Ave., San Francisco, CA on March 26, 2014;
- (47) \$98,791.00 seized from 999 87th St., Daly City, CA on March 26, 2014;
- (48) Equipment that facilitated the cultivation and distribution of marijuana seized at 5804 Highland Avenue, Richmond, CA on February 20, 2014;
- (49) Equipment that facilitated the cultivation and distribution of marijuana seized at 5176 Judsonville Avenue, Antioch, CA on October 30, 2012;
- (50) Electrical equipment, such as plant grow light bulbs, hoods, and electrical ballasts, seized from 555 Merritt Dr., Concord, CA on February 20, 2014;
- (51) \$26,786.00 seized from 225 Jules Ave., San Francisco, CA on March 26, 2014;
- (52) \$15,142.00 seized from 1116 St. Francis Dr., Concord, CA on March 26, 2014;
- (54) \$8,006.00 seized from 991 Carolina St., San Francisco, CA on March 26, 2014;
- (55) \$5,644.00 seized from 558 Broadway St., Apt. 8, San Francisco, CA on March 26, 2014;
- (56) \$3,452.00 seized from 353 King St., Apt. 720, San Francisco, CA on March 26, 2014;
- (57) \$2,717.00 seized from 128 Buxton Ave., South San Francisco, CA on March 26, 2014;
- (58) \$1,698.00 seized from James Pau at 133-43 37<sup>th</sup> Ave., Flushing, NY on March 25, 2014;
- (59) \$1,076.00 seized from Leslie Yun at 133-43 37<sup>th</sup> Ave., Flushing, NY on March 25, 2014

4. Upon conviction of any of the offenses alleged in Counts 4-133 and 139-162 of this Third Superseding Indictment, the defendant,

KWOK CHEUNG CHOW,  
a/k/a "Raymond Chow,"  
a/k/a "Ha Jai,"  
a/k/a "Shrimpboy,"

shall, pursuant to 18 U.S.C. § 982(a)(1), forfeit to the United States any property, real and personal, involved in said violations, or any property traceable to such property.

5. The property to be forfeited includes, but is not limited to:

\$8,507.32 seized from 6386 Blackwood Dr., Cupertino, CA on March 26, 2014

6. Upon conviction of any of the offenses alleged in Counts 134-138 of this Third Superseding Indictment, the defendant,

KWOK CHEUNG CHOW,  
a/k/a "Raymond Chow,"  
a/k/a "Ha Jai,"

a/k/a "Shrimpboy"

shall, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 2314, 2315, 2342, 2344, or a conspiracy to commit said offenses.

7. If, as a result of any act or omission of the defendants, any of the property subject to forfeiture

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to or deposited with, a third person;
- 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;

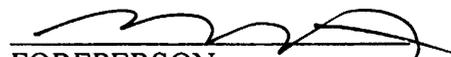
any and all interest defendants have in any other property (up to the value of the property subject to forfeiture), shall be forfeited to the United States pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

All in violation of Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), and 1963; Title 21, United States Code, Section 853; Title 28, United States Code, Section 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

DATED:

A TRUE BILL

10-15-15

  
FOREPERSON

BRIAN J. STRETCH  
Acting United States Attorney

 ASST. ASST. HASIB FOR  
DAVID R. CALLAWAY  
Chief, Criminal Division

(Approved as to form:

  
AUSA WILLIAM FRENTZEN  
AUSA SUSAN BADGER  
AUSA S. WAQAR HASIB