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SEALED
BY COURT ORDER

UNSEALED BY ORDER
OF MAGISTRATE JUDGE
NATHANAEL COUSINS
MARCH 26, 2013

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

NC

3 14 70421

IN RE: CRIMINAL COMPLAINT	AFFIDAVIT OF SPECIAL AGENT EMMANUEL V. PASCUA IN SUPPORT OF COMPLAINT
	FILED UNDER SEAL

I, Emmanuel V. Pascua, Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state that:

I. BACKGROUND

A. AGENT QUALIFICATIONS

I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since August 2004. During my employment as a Special Agent, I have been tasked with domestic terrorism and organized crime investigations. Based on these investigations, I have gained experience in the use

of law enforcement techniques including the use of confidential sources, undercover operations, physical surveillance tools such as pole cameras, recorders, and global position satellite enabled tracking devices, and other electronic surveillance tools such as body wires and transmitters. Additionally, I have gained experience in analyzing telephone toll records, financial records and utility records. I have been involved in operations and investigations involving drug evidence and the utilization of buy/bust techniques since 2004. I have received additional training on financial investigations, specifically investigations dealing with money laundering activities.

As a result of my experience, I have encountered and become familiar with the day to day operations and the various practices of individuals involved in organized crime. I have also consulted and discussed these types of investigations with federal agents, state and local police officers, and attorneys who are experienced in investigations involving organized crime. I have discussed the topic of firearms trafficking with two FBI Firearms Instructors, specifically on the topic of items indicative of firearms trafficking.

I have been an affiant on one Title III affidavit involving subjects named in section II of this affidavit engaged in organized crime activity and have participated in at least three other investigations involving the interception of communications pursuant to Title III. As a result of this experience, I am familiar with the use of wiretaps as an investigative technique.

I have been an affiant on at least 13 search warrants for residences, vehicles, electronic devices, DNA and cellular telephone GPS information. The majority of these search warrants involved the investigation of organized criminal activity.

I am an investigative or law enforcement officer of the United States, within the meaning of 18 U.S.C. § 2510(7), and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

I am making this affidavit in support of a complaint for the issuance of arrest warrants for the

Targets included in Part B of this Section of the affidavit, for violations of the Statutes included in Part C of this Section of the affidavit.

B. COMPLAINANTS

Kwok Cheung CHOW, a/k/a Raymond Chow, a/k/a Shrimp Boy, a/k/a Ha Jai (hereinafter CHOW) is a 54-year old Chinese citizen who is believed to reside in San Francisco, California. Based on publicly available information as well as information from confidential human sources and other sources of information, CHOW is currently the Dragonhead, or leader, of the San Francisco-based Chee Kung Tong organization (herein "CKT").[1] CHOW's criminal history includes a guilty plea in federal court for racketeering, involving murder for hire, conspiracy to distribute heroin, arson, and conspiracy to collect extensions of credit. He also has state felony convictions for robbery using a firearm and assault with a firearm on a person, and served time in state prison on both charges. He is currently in this country while awaiting resolution of an application to U.S. Immigration and Customs Enforcement (ICE) to obtain an S-visa (which is a type of visa issued to witnesses in criminal proceedings). As a

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[1] The CKT is believed to be an offshoot of the Hung Mun. Based on my review of open source information, I am aware that the Hung Mun, also referred to as a Chinese secret society and the Chinese Freemasons, among other names, began in China sometime in the mid-17th century as a result of a revolutionary movement to overthrow the Manchu-ruled Qing Dynasty in China. The Qing Dynasty lasted roughly from 1644 to 1911. The Hung Mun were aggressively pursued and punished by the Qing Dynasty rulers throughout their existence. This persecution, along with cultural and economic influences drove these societies underground, causing them to adopt secretive customs, rules, ceremonies and operating procedures. Hung Mun members who emigrated from China throughout the world in the mid-late 19th century brought their Hung Mun customs and rituals with them to their new homes abroad and numerous organizations sprung from these Hung Mun roots. Many of these organizations became known as Tongs in the United States. Many of the Tongs maintained their secretive hierarchies, rituals and ceremonies but were able to operate much more openly outside China without the threat of government persecution and retribution. Most Tongs shared the political goal of overthrowing the Manchu dynasty that ruled China; however, some were purely social groupings that focused on mutual aid and recreation for members. Others served administrative and judicial functions within the community, allocating business locations and cemetery sites, settling disputes, and enforcing the payment of debts. Still others engaged in criminal activities: protection rackets, extortion, and strong-arm methods for controlling such tolerated vices as gambling and prostitution.
One such organization which later became one of the strongest and most influential in North America is the Chee Gung Tong, or Chee Kung Tong, also known as the CKT, headquartered in San Francisco. The CKT and its criminal activities have been of interest to law enforcement since at least as early as 2006, when the CKT's previous Dragonhead, Allen Leung, was murdered in San Francisco.

result of this application, CHOW currently wears an ankle bracelet and is under the supervision of an ICE deportation officer. According to a plea agreement that CHOW signed when pleading guilty to federal racketeering charges in 2000, CHOW was at that time an admitted member of the San Francisco-based Hop Sing Tong (herein "HST")[2] and one of the leaders of criminal activities engaged in by the underlings of this organization. As part of his role in this organization, CHOW engaged in such activities as heroin and cocaine trafficking, attempted murder, arson, robbery, gambling and extortionate credit transactions. CHOW was sentenced to a total of 160 months on these charges, but ultimately served a shorter sentence after receiving consideration for cooperating in United States v. Chong, CR-92-00260-DLJ. In August of 2006, after being released from federal incarceration, CHOW was sworn in as the new Dragonhead, or leader, of the CKT, soon after the murder of the previous Dragonhead, Allen Ngai Leung; that murder remains unsolved. News of CHOW's rise to the Dragonhead position was reported in local Chinese media sources, and was also reported to the FBI by multiple confidential sources; as a result, both the San Francisco Police Department and the FBI conducted surveillance at his swearing-in. Based on information that has been received by FBI agents from confidential human sources, as CKT Dragonhead CHOW holds a "489" position in the Triad, which is an internationally-based Chinese organized crime group. The "489" position signifies supreme authority within the Triad, and is consistent with CHOW's position as Dragonhead of the CKT. Also according to confidential human sources, CHOW is believed to have ties with Triad members in China and Hong Kong. Also, according to information received by the FBI, CHOW is currently, or was until recently, the leader of the Hop Sing Gang, a local San Francisco street gang that has approximately 200-300 members. As discussed in further detail below, CHOW has used his position in these

[2]My review of information relating to the HST leads me to believe that, much like the CKT, it was at one time a civic organization within the Chinese community that became involved in criminal activity as a result of Asian organized crime influences. The HST and its criminal activities have been of interest to law enforcement since at least as early as the 1990s, when the HST was being investigated for its connections to Asian organized crime.

organizations to sanction and encourage George NIEH and other Target Subjects to engage in money laundering and possibly other criminal activities with an undercover employee (UCE) of the FBI. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that CHOW has violated the following criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity); Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce); and Title 18, United States Code, Sections 371, 2342 and 2344 (Conspiracy to Traffic and Trafficking in Contraband Cigarettes).

Leland Yin YEE, a/k/a California State Senator Leland Yee, a/k/a Uncle Leland (hereinafter SENATOR YEE) is a 65 year-old U.S. citizen believed to reside in San Francisco, California. SENATOR YEE currently represents California legislative District 8, which encompasses San Mateo County and part of San Francisco County. Senator YEE's term will end on December 16, 2014. SENATOR YEE unsuccessfully ran for Mayor of San Francisco in the election held on November 8, 2011, and is currently running for California Secretary of State in an election to be held in November 2014. As further detailed below, SENATOR YEE and KEITH JACKSON were involved in a scheme to defraud the citizens of California of their rights to honest services, and SENATOR YEE, LIM and KEITH JACKSON were involved in a conspiracy to traffic firearms. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that SENATOR YEE has violated the following criminal statutes: Title 18, United States Code, Section 1343 and 1346 (Wire Fraud of Honest Services); Title 18, United States Code, Sections 371, 922(a)(1) and 922(l) (Conspiracy to Deal Firearms Without a License and to Illegally Import Firearms).

Keith JACKSON (hereinafter KEITH JACKSON) is a 49 year-old United States citizen, believed to reside in San Francisco, California. KEITH JACKSON works as a political consultant.

KEITH JACKSON has no known criminal convictions. As further detailed below, KEITH JACKSON was involved in a scheme to defraud of honest services, a murder for hire conspiracy, gun trafficking, and drug trafficking conspiracy. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that KEITH JACKSON has violated the following criminal statutes: Title 18, United States Code, Section 1343 and 1346 (Wire Fraud of Honest Services); Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); Title 18, United States Code, Sections 371, 922(a)(1) and 922(l) (Conspiracy to Deal Firearms Without a License and to Illegally Import Firearms); and Title 18, United States Code, Section 1958 (Murder for Hire).

Kevin SIU, a/k/a Dragon Tin Loong Siu (hereinafter SIU). SIU is a 30 year-old U.S. citizen who is believed to reside in Daly City, California. SIU has two prior arrests; one for prostitution and another related to loitering to commit prostitution. He is believed to own a business which is involved in the sale of electronic cigarettes. As described in further detail below, CHOW and NIEH introduced SIU to a UCE as someone who could launder money. Since then, SIU engaged in several money laundering transactions with a UCE. SIU also told a UCE that SIU was a member of the CKT, or possibly the CKT's secretary; however, as described in further detail below, SIU and CHOW have since had a falling-out. Accordingly, SIU's current relationship to the CKT is unknown. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that SIU has violated the following criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity).

George NIEH, a/k/a Heng Nieh, a/k/a Ah Fei (hereinafter NIEH) is a 44 year-old U.S. citizen who is believed to reside in San Francisco, California. According to California state employment records, he has no known employment records for the last three years. NIEH has a previous California state felony conviction for assault. NIEH has told a UCE that NIEH is a member of the CKT. NIEH

has claimed to a UCE that he is the leader of the Wah Ching, a local street gang, with approximately 60 members. NIEH claims to be a close associate and driver of CHOW. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that NIEH has violated the following criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity); Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce); Title 18, United States Code, Sections 371, 2342 and 2344 (Conspiracy to Traffic and Trafficking in Contraband Cigarettes); Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title 18, United States Code, Section 922(g)(1) (Felon in Possession of a Firearm).

Alan CHIU, a/k/a Alan Shiu (hereinafter CHIU) is a 58 year-old U.S. citizen who is believed to reside in San Francisco, California. He has no known criminal history. He is believed to currently be employed by Men's Wearhouse, Inc. Based on representations made to a UCE by CHIU, NIEH and others, CHIU is believed to be a member of the CKT and a close associate of CHOW. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that CHIU has violated the following criminal statute: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity).

Xiao Cheng MEI, a/k/a Michael Mei (hereinafter MEI) is a 30 year-old U.S. citizen, believed to reside in Daly City, California. MEI has no known criminal history. MEI is a close associate of CHOW and NIEH, and is also believed to be a CKT member. NIEH stated to UCE 4599 that MEI would be a potential business associate regarding marijuana cultivation and distribution. NIEH has further stated to UCE 4599 that MEI is vying for a position within the CKT similar to the position SIU previously held. NIEH advised UCE 4599 that MEI may also be a supplier for firearms. As described

in further detail below, a search warrant was executed at a residence in Antioch and was suspected to be a marijuana grow house belonging to MEI. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that SIU has violated the following criminal statute: Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Andy LI, a/k/a Andy Man Lai LI, a/k/a Andy M. LI (hereinafter LI) is a 40 year-old U.S. citizen, believed to reside in South San Francisco, California. LI has a misdemeanor conviction for arson dating from June 1992 in California. LI also has a felony conviction for being an accessory to robbery in July 1993 in California. LI also has federal felony convictions for theft from interstate shipments, in violation of 18 U.S.C. § 659. LI in past was a close associate of CHOW, but recently had an altercation with CHOW causing their relationship to end. LI may no longer be a CKT member. As described in further detail below, LI has engaged in money laundering (proceeds are believed to be from illegal drug trafficking), sold controlled substances to a FBI UCE, conspired to distribute controlled substances with an FBI UCE, facilitated the sale of a firearm to an FBI UCE and provided a ballistic vest to an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that LI has violated the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title 18, United States Code, Section 922(g)(1) (Felon in Possession of a Firearm).

Kongphet CHANTHAVONG, a/k/a Joe (hereinafter CHANTHAVONG) is a 36 year old Thailand citizen who is believed to reside in San Francisco, California. U.S. Immigration records show that CHANTHAVONG has an outstanding warrant of deportation; however, country conditions preclude deportation. CHANTHAVONG's criminal history includes two state felony convictions for the possession and/or purchase of cocaine base for sale, and a felony conviction for conspiracy to export

stolen vehicles. CHANTHAVONG was at one time a CKT member and close associate of CHOW, but because of his affiliation with LI, it is believed that CHANTHAVONG no longer has a relationship with CHOW, nor is he a member of the CKT. CHANTHAVONG was recently introduced by NIEH to a FBI UCE as a marijuana trafficker. As described in further detail below, CHANTHAVONG has distributed controlled substances, conspired to distribute controlled substances with an FBI UCE and firearms trafficking. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that CHANTHAVONG has violated the following criminal statutes: Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics); Title 21, United States Code, Section 841 (Possession with Intent to Distribute Narcotics); Title 18, United States Code, Section 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title 18, United States Code, Section 922(g)(1) (Felon in Possession of a Firearm).

Jane Miao Xhen LIANG, a/k/a Jane LIANG (hereinafter JANE LIANG) is a 35 year-old U.S. citizen, believed to reside in Daly City, California. JANE LIANG does not have a criminal history. As detailed further below, JANE LIANG has facilitated a purported stolen liquor transaction with an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that JANE LIANG has violated the following criminal statutes: Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce).

Tina Yao Gui LIANG, a/k/a Tina LIANG (hereinafter TINA LIANG) is a 39 year-old U.S. citizen, believed to reside in Concord, CA. TINA LIANG has no known criminal history. TINA LIANG is an associate of CHOW. CHOW directly introduced TINA LIANG to an FBI UCE to conduct criminal activity. As detailed further below, TINA LIANG participated in a purportedly stolen liquor transaction with an FBI UCE and is believed to be involved in cultivating and distributing marijuana. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that TINA

LIANG has violated the following criminal statutes: Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce) and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Bryan TILTON (hereinafter TILTON) is a 37 year-old U.S. citizen, believed to reside in Daly City, California. TILTON has no known criminal convictions. TILTON is an associate of TINA LIANG and JANE LIANG. As detailed further below, TILTON participated in a purportedly stolen liquor transaction with an FBI UCE and is believed to be involved in cultivating and distributing marijuana. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that TILTON has violated the following criminal statutes: Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce) and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Huan Ming MA, a/k/a Ming MA, a/k/a Bak Baan (hereinafter MA) is a 29 year-old U.S. Legal Resident, believed to reside at in San Francisco, California. MA has no known criminal convictions. MA is a member of the CKT and holds the position of Enforcer. Detailed further below, MA facilitated the purchase of purportedly stolen liquor with an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that MA has violated the following criminal statutes: Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce).

Hon Keung SO, a/k/a Hon SO (hereinafter SO) is a 55 year-old United States Legal Resident, believed to reside in Alameda, California and to own the New Asian Restaurant in San Francisco, California. SO was state convicted of driving under the influence (DUI) in February 2003. SO is known to host many of the CKT events at the New Asia Restaurant and has purchased purportedly stolen liquor from an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that MA has violated the following criminal statutes: Title 18, United States

Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce).

Albert NHINGSAVATH, a/k/a Al NHINGSAVATH (hereinafter NHINGSAVATH) is a 32 year-old U.S. citizen, believed to reside in San Francisco, California. NHINGSAVATH's criminal history includes one federal felony conviction for distribution of MDMA, in violation of 21 U.S.C. § 846 in May 2005. NHINGSAVATH is a close associate of LI and CHANTHAVONG. As detailed further below, NHINGSAVATH engaged in money laundering (proceeds are believed to be from illegal drug trafficking) and conspired to distribute controlled substances with an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that CHANTHAVONG has violated the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Norge Ronald MASTRANGELO (hereinafter MASTRANGELO) is a 37 year-old United States citizen, believed to reside in San Francisco, California. MASTRANGELO's criminal history includes a state misdemeanor conviction for criminal possession of a Controlled Substance – 7th degree in New York. As further detailed below, MASTRANGELO was involved in money laundering with an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that MASTRANGELO has violated the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering).

Anthony John LAI, a/k/a AJ (hereinafter LAI) is a 26 year-old U.S. citizen, believed to reside in Daly City, California. LAI is an associate of GEE and ELAINE LIANG. LAI has no known criminal convictions. As detailed further below, LAI was involved in money laundering (proceeds are believed to be from illegal drug trafficking) with an FBI UCE and conspired to distribute illegal drugs. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that LAI has violated

the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Serge GEE, a/k/a John (hereinafter GEE) is a 28 year-old United States citizen, believed to reside in Cupertino, California. GEE's criminal history includes battery as a juvenile with no disposition. As further detailed below, GEE was involved in money laundering with an FBI UCE and the distribution of illegal drugs. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that GEE has violated the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Gary Kwong Yiu CHEN, a/k/a Gary CHEN, a/k/a Jimmy, a/k/a David (hereinafter CHEN) is a 25 year-old U.S. citizen, believed to reside in San Francisco, California. CHEN has no criminal convictions. CHEN is the associate of GEE and ELAINE LIANG. As detailed further below, CHEN was involved with money laundering (proceeds are believed to be from illegal drug trafficking) with an FBI UCE and a conspiracy to distribute illegal drugs. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that CHEN has violated the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering); and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Xiu Ying Ling LIANG, a/k/a Elaine LIANG (hereinafter ELAINE LIANG) is a 51 year-old U.S. Legal Resident, believed to reside in Cupertino, California. ELAINE LIANG's criminal history is a DUI state misdemeanor. As detailed further below, ELAINE LIANG was involved in money laundering with an FBI UCE. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that ELAINE LIANG has violated the following criminal statutes: Title 18, United States Code, Section 1956(a)(1)(A) and (B) (Money Laundering).

Leslie YUN, a/k/a Leslie Yuncheung, a/k/a Leslie Yuong (hereinafter YUN) is a 42 year old United States Citizen, believed to reside in Oakland, California. YUN was federally convicted on 3 counts of forgery in January of 1996. YUN is a close associate of CHOW and is a director for the Ghee Kung Tong Supreme Lodge Chinese Freemasons of the World (a/k/a CKT) in a 2012 tax filing.1 As described in further detail below, YUN was involved in conducting money laundering transactions, purchased purportedly stolen cigarettes and known to traffic marijuana. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that YUN has violated the following criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity); Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy to Receive and Transport Stolen Property in Interstate Commerce); Title 18, United States Code, Sections 371, 2342 and 2344 (Conspiracy to Traffic and Trafficking in Contraband Cigarettes); and Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics).

Yat Wah PAU, a/k/a James PAU (hereinafter PAU) is a 55 year-old Naturalized United States citizen, believed to reside in Oakland, California. PAU has no known criminal convictions. PAU is a director for the Ghee Kung Tong Supreme Lodge Chinese Freemasons of the World (a/k/a CKT) in a 2012 tax filing. PAU is a long time CKT member and associate of CHOW. As described in further detail below, PAU was involved in conducting money laundering transactions and purchasing purportedly stolen cigarettes. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that YUN has violated the following criminal statutes: Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 (Money Laundering of Funds Believed to be Proceeds of Specified Unlawful Activity); Title 18, United States Code, Sections 371, 2314, and 2315 (Conspiracy

1 The Ghee Kung Tong Supreme Lodge is commonly referenced as the Chee Kung Tong (CKT). The Chee Kung Tong spelling or reference is often considered the transliteration of the Ghee Kung Tong spelling. Any references in section II of this affidavit to the Ghee Kung Tong is synonymous to the Chee Kung Tong.

to Receive and Transport Stolen Property in Interstate Commerce); Title 18, United States Code, Sections 371, 2342 and 2344 (Conspiracy to Traffic and Trafficking in Contraband Cigarettes).

Brandon Jamelle JACKSON (hereinafter BRANDON JACKSON) is a 28 year-old United States citizen, believed to reside in San Francisco, California. BRANDON JACKSON has no criminal convictions. BRANDON JACKSON is the son and criminal associate of KEITH JACKSON and the associate of Marlon SULLIVAN. As detailed further below, BRANDON JACKSON was involved in a murder for hire conspiracy, gun trafficking, and drug trafficking conspiracy. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that BRANDON JACKSON has violated the following criminal statutes: Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title 18, United States Code, Section 1958 (Murder for Hire).

Marlon Darrell SULLIVAN (hereinafter SULLIVAN) is a 29 year-old U.S. citizen, believed to reside in Oakland, California. SULLIVAN works as a sports agent. SULLIVAN has no known criminal convictions. SULLIVAN is an associate of KEITH JACKSON and BRANDON JACKSON. As detailed further below, SULLIVAN was involved in a murder for hire conspiracy, gun trafficking, drug trafficking conspiracy and the sale of fraudulent credit cards. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that SULLIVAN has violated the following criminal statutes: Title 21, United States Code, Section 846 (Conspiracy to Distribute Narcotics); Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title 18, United States Code, Section 1958 (Murder for Hire).

Rinn ROEUN (hereinafter ROEUN) is a 30 year-old United States Legal Resident, believed to reside in San Francisco, California. ROEUN's criminal history includes multiple state felony arrests as a juvenile with no disposition on record. As further detailed below, ROEUN was involved in selling multiple firearms to an FBI UCE and conspired to commit a murder for hire for an FBI UCE. I believe

that the facts detailed below are sufficient to demonstrate probable cause to believe that ROEUN has violated the following criminal statutes: Title 18, United States Code, Section 922(a)(1) and 2 (Dealing in Firearms Without a License); and Title 18, United States Code, Section 1958 (Murder for Hire).

Wilson Sy LIM, a/k/a Dr. Lim (hereinafter LIM) is a 60 year-old U.S.citizen, believed to reside in Daly City, California. LIM has no known criminal record. LIM is an associate of SENATOR YEE and KEITH JACKSON. As further detailed below, LIM, SENATOR YEE and KEITH JACKSON were involved in a conspiracy to traffic firearms. I believe that the facts detailed below are sufficient to demonstrate probable cause to believe that LIM has violated the following criminal statutes: Title 18, United States Code, Sections 371, 922(a)(1) and 922(l) (Conspiracy to Deal Firearms Without a License and to Illegally Import Firearms).

C. STATUTES VIOLATED

Title 18, United States Code, Section 1956(a)(3)(A) and (B) provides:

"Whoever, with the intent . . . to promote the carrying on of specified unlawful activity; [or] to conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity . . . conducts or attempts to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity, or property used to conduct or facilitate specified unlawful activity, shall be fined under this title or imprisoned for not more than 20 years, or both. For the purposes of this paragraph . . . the term 'represented' means any representation made by a law enforcement officer or by another person at the direction of, or with the approval of, a Federal official authorized to investigate or prosecute violations of this section."

Title 18, United States Code, Section 1956(a)(1)(A) and (B) provides:

"Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity . . . with the intent to promote the carrying on of specified unlawful activity; or . . . knowing that the transaction is designed in whole or in part . . . to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity . . . shall be sentenced to a fine of not more than $500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than twenty years, or both."

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Title 18, United States Code, Section 371 provides:

"If two or more persons conspire . . . to commit any offense against the United States . . . and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both."

Title 18, United States Code, Section 2314 provides:

"Whoever transports, transmits, or transfers in interstate or foreign commerce any goods, wares, merchandise, securities or money, of the value of $5,000 or more, knowing the same to have been stolen, converted or taken by fraud . . . shall be fined under this title or imprisoned not more than ten years, or both."

Title 18, United States Code, Section 2315 provides:

"Whoever receives, possesses, conceals, stores, barters, sells, or disposes of any goods, wares or merchandise, securities or money of the value of $5,000 or more . . . which have crossed a State or United States boundary after being stolen, unlawfully converted, or taken, knowing the same to have been stolen, unlawfully converted, or taken . . . [s]hall be fined under this title or imprisoned not more than ten years, or both."

Title 21, United States Code, Section 841(a)(1) provides:

"[I]t shall be unlawful for any person knowingly or intentionally to manufacture, distribute . . . or possess with intent to manufacture, [or] distribute . . . a controlled substance" and penalties depend on type and quantities of controlled substance.

Title 21, United States Code, Section 846 provides:

"Any person who attempts or conspires to commit any offense defined in this subchapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy."

Title 18, United States Code, Section 922(a)(1) provides:

"It shall be unlawful for any person except a licensed importer, licensed manufacturer, or licensed dealer, to engage in the business of importing, manufacturing, or dealing in firearms, or in the course of such business to ship, transport, or receive any firearm in interstate or foreign commerce" and penalties are provided pursuant to 924(a)(1)(D) for willful violations of being "fined under this title, imprisoned not more than five years, or both."

Title 18, United States Code, Section 922(g)(1) provides:

"It shall be unlawful for any person who has been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year . . . to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate commerce."

Title 18, United States Code, Section 924(c) provides:

"[A]ny person who, during and in relation to any crime of violence or drug trafficking crime . . . for which the person may be prosecuted in a court of the United States, uses or carries a firearm, or who, in furtherance of any such crime, possesses a firearm, shall, in addition to the punishment provided for such crime of violence or drug trafficking crime . . . be sentenced to a term of imprisonment of not less than 5 years . . . [and] no term of imprisonment imposed on a person under this subsection shall run concurrently with any other term of imprisonment imposed on the person, including any term of imprisonment imposed for the crime of violence or drug trafficking crime during which the firearm was used, carried, or possessed."

Title 18, United States Code, Section 2342(a) provides:

"It shall be unlawful for any person knowingly to ship, transport, receive, possess, sell, distribute, or purchase contraband cigarettes." Contraband cigarettes are defined as "a quantity in excess of 10,000 cigarettes, which bear no evidence of the payment of applicable State or local cigarette taxes in the State or locality where such cigarettes are found, if the State or local government requires a stamp, impression, or other indication to be placed on packages or other containers of cigarettes to evidence payment of cigarette taxes, and which are in the possession of any person other than" a manufacturer or warehouse proprietor exempted from the law, a common carrier with a proper bill of lading, a person licensed and in compliance with the State, or a government employee. Section 2344 provides that "Whoever knowingly violates section 2342(a) of this title shall be fined under this title or imprisoned not more than five years, or both." I am aware that New York law requires tax stamps affixed to cigarettes sold in New York.

Title 18, United States Code, Section 1958 provides:

"Whoever travels in or causes another . . . to travel in interstate or foreign commerce, or uses or causes another . . . to use the mail or any facility of interstate or foreign commerce, with intent that a murder be committed in violation of the laws of any State or the United States as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value, or who conspired to do so, shall be fined under this title or imprisoned not more than ten years, or both . . . ."

Title 18, United States Code, Section 922(l) provides:

"[I]t shall be unlawful for any person knowingly to import or bring into the United States or any possession thereof any firearm or ammunition; and it shall be unlawful for any person knowingly to receive any firearm or ammunition which has been imported or brought into the United States or any possession thereof in violation of the provisions of this chapter."

Title 18, United States Code, Section 1343 provides:

"Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire . . . communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both." And Section 1346 provides: "For

the purposes of this chapter, the term 'scheme or artifice to defraud' includes a scheme or artifice to deprive another of the intangible right of honest services."

II. PROBABLE CAUSE

A. SUMMARY OF INVESTIGATION

At some point in the last five years, an undercover FBI agent (herein "UCE 4527") was introduced to a high-level member of the CKT. As a result of this introduction, in May 2010, another undercover FBI agent (herein "UCE 4599") was introduced to target subject Raymond CHOW. CHOW then introduced UCE 4599 to many of the target subjects, referenced in Section I of this Affidavit.

As FBI UCEs continued to infiltrate the CKT through introductions made by CHOW and NIEH, it became apparent that CHOW was in charge of a criminal element of the CKT, which will be referred to as the CHEE KUNG TONG CRIMINAL ENTERPRISE (herein CKTCE). In particular, during a meeting with UCE 4599, while seated in a booth in a karaoke bar, CHOW whispered into UCE 4599's ear that although CHOW was no longer involved in criminal activity, CHOW knew of and approved all criminal activities within his organization. Moreover, CHOW has described himself to UCE 4599 as a judge within his organization. According to CHOW, when there is a dispute between the organization's members and if one member kills another member, CHOW decides if the killing was justified. NIEH has explained to UCE 4599 that he, meaning NIEH, is also considered a leader within the organization, but that NIEH still reports to CHOW, whom NIEH described as the equivalent of a general. On another occasion, during a discussion between CHOW and NIEH in a court authorized T-III intercept, CHOW acknowledged that the activities between UCE 4599 and officials who hold positions in the CKT (YUN and PAU) can be interpreted as organized crime and that NIEH needed to take care when involving YUN in such activity [money laundering] because of her [YUN's] financial responsibilities and ties to the CKT and CHOW's company [believed to be CHOW ENTERPRISES, LLC]. Additionally, NIEH explained to UCE 4599 that CHOW has sacrificed himself by being a target of law enforcement and that has enabled other members of his organization to conduct criminal activity "freely" because law

enforcement was focused on CHOW. From this investigation, activities of CHOW and members of the CKTCE show a pattern of racketeering activity.

During the course of multiple undercover operations, UCE 4599 was brought into a criminal relationship with many of the Targets. The purpose of this criminal relationship was for CHOW, NIEH, SIU, and CHIU to launder UCE 4599's money, purported by UCE 4599 to have been derived from illegal activities, specifically illegal gambling, bookmaking, sports betting, drugs, and outdoor marijuana grows. In further support of UCE 4599's legend, UCE 4599 portrayed himself to CHOW and others as an east coast member of La Cosa Nostra, an Italian organized crime syndicate. CHOW, as the Dragonhead of the CKT, was the supervisor of the criminal relationship with UCE 4599. In support, both NIEH and SIU and other Targets have stated to UCE 4599 that CHOW sanctioned them to engage in criminal activities with UCE 4599. Eventually, in March of 2012, UCE 4599 was inducted into the CKT at an event, and given the title of Consultant to the CKT.

Through subsequent undercover operations, UCE 4599 conveyed to NIEH his interest in laundering money with other associates of NIEH and CHOW. NIEH then introduced YUN and PAU to UCE 4599 for the purpose of laundering money for UCE 4599. UCE 4599 explained to YUN and PAU the source of this money was from outdoor marijuana grows.

From March 2011 through December 2013, CHOW, NIEH, SIU, CHIU, YUN and PAU collectively laundered $2,290,000, in purportedly illicit funds, for UCE 4599. Specifically, NIEH laundered $1,720,000, SIU laundered $160,000, CHIU laundered $170,000, YUN and PAU laundered a total of $240,000. They were paid a 10% fee for laundering the money.

As the criminal relationship continued to develop among UCE 4599, CHOW and the Targets, UCE 4599 advised that he was interested in generating income from any illegal schemes in which they are involved.

In response, NIEH, CHOW and UCE 4599 engaged in a scheme to transport stolen liquor to

China. It was at that time, CHOW directly introduced TINA LIANG, who is an associate of TILTON and JANE LIANG. UCE 4599 subsequently conducted a purportedly stolen liquor transaction with TINA LIANG, TILTON and JANE LIANG, where they paid UCEs $30,000 for purportedly stolen liquor. Later in the investigation, it was revealed that the purportedly stolen liquor was shipped to Vietnam in lieu of being shipped to China. CHOW and NIEH were each paid $5,000 for facilitating this transaction.

Subsequently, NIEH introduced MA and SO. SO owns a restaurant located in San Francisco where many of the CKT events have been held. UCE 4599 on two occasions sold purportedly stolen liquor to MA and SO totaling approximately $14,500. CHOW and NIEH were both paid $6,000 each for facilitating these purportedly stolen liquor transactions. MA was paid $900 for his role.

Through consultations with CHOW, NIEH continued to help UCE 4599 build his criminal relationships with members of the CKTCE. In particular, NIEH, YUN and PAU expressed interest in facilitating the sale of purportedly stolen cigarettes without proper tax stamps (contraband cigarettes) to CKTCE associates located in New York. In New York, on three occasions, UCEs sold in total 250 master cases of cigarettes to YUN, PAU, CHAN and ZHANG, and others yet to be identified, for $431,910.

YUN and PAU profited $36,010 from the purportedly stolen and contraband cigarette transactions. CHOW and NIEH received $17,000 each as part of their profits.

NIEH has also introduced UCE 4599 to CHANTHAVONG, for the purpose of allowing UCE 4599 to assist CHANTHAVONG in a San Francisco-based marijuana trafficking operation that CHANTHAVONG operated. After furthering the relationship with CHANTHAVONG, UCE 4599 was introduced to CHANTHAVONG'S criminal associates LI, and NHINGSAVATH, who solicited UCE 4599's help in laundering drug proceeds from the east coast to San Francisco. UCE 4599 purported that he and his criminal associates on the east coast would accommodate their request in exchange for a

money laundering fee. LI and NHINGSAVATH agreed, and later involved criminal associates MASTRANGELO and others, who facilitated multiple money laundering transactions by dropping off drug proceeds in the form of cash to FBI UCEs on the east coast.

From March 2011 to December 2013, CHANTHAVONG, LI, NHINGSAVATH, MASTRANGELO and others with the permission of CHOW, have money laundered drug proceeds with UCE 4599 totaling $1,048,764. Additionally, both LI and CHANTHAVONG have sold multiple firearms illegally, as well providing as a ballistic vest to UCE 4599. LI and CHANTHAVONG have also provided processed marijuana to UCE 4599 in exchange for cash.

In October 2012, local law enforcement conducted state search warrants at CHANTHAVONG's residence and a warehouse associated to CHANTHAVONG. At the residence, officers and federal agents seized 91 marijuana plants, a loaded firearm, and approximately 1.785 kilograms of cocaine (one pressed into a brick form), among other items. At the warehouse associated to CHANTHAVONG, officers and federal agents seized 496 marijuana plants and a press with wood form attachments which appeared to be used as a tool to press material into a brick shape. The press and wood forms had trace amounts of a white powdery substance that tested positive for cocaine.

Through CHOW and NIEH, UCE 4599 was also introduced to MICHAEL MEI, another member of the CKTCE, who was involved in drug trafficking. In October 2012, local law enforcement conducted state search warrants at a location associated to MICHAEL MEI. At this location, officers and federal agents seized 803 marijuana plants, to include indicia from a vehicle located in the house, among other items. The indicia included a map of Northern California with a location circled that corresponds to 33 Woodland Avenue, Daly City, CA. MEI's insurance documents were also found in one of the vehicles at this indoor marijuana location and MEI later discussed this location with UCE 4599.

As UCE 4599 continued to purport his interest in seeking profits from criminal activity, CHOW

and NIEH then introduced ELAINE LIANG who requested that UCE 4599 launder drug proceeds from the east coast to San Francisco, CA. ELAINE LIANG then introduced GEE who revealed to UCE 4599 their extensive drug network that extends to Georgia, New York, and Massachusetts. UCE 4599 purported that he and his criminal associates on the east coast would accommodate their request in exchange for a money laundering fee. ELAINE LIANG and SERGE GEE agreed and later introduced LAI, CHEN, and others, who facilitated money laundering transactions in cities located in Georgia, New Jersey and Massachusetts.

From August 2013 to December 2013, ELAINE LIANG, GEE, LAI, CHEN and others, with the support of CHOW, have successfully laundered drug proceeds with UCE 4599 totaling $1,557,085.

CHOW was paid approximately $30,000 for facilitating these money laundering operations through his support as the leader of the CKTCE.

CHOW also introduced KEITH JACKSON to UCE 4599. KEITH JACKSON is a Consultant to the CKT, similar to the position of UCE 4599 who was inducted into the CKT.

Since this introduction, KEITH JACKSON, BRANDON JACKSON and SULLIVAN have committed and conspired to commit several criminal schemes. In particular, UCE 4599 purported to KEITH JACKSON his need for a large amount of weapons to arm his purported associates who tended to marijuana grows located in northern California. KEITH JACKSON responded by stating his son, BRANDON JACKSON and his associate SULLIVAN would be able to accommodate his request. Subsequently, KEITH JACKSON, BRANDON JACKSON and SULLIVAN sold various types of firearms, and two ballistic vests, to UCE 4599 in parking lots located in San Francisco. Additionally, KEITH JACKSON, BRANDON JACKSON and SULLIVAN, have conspired to commit a purported murder for hire scheme requested by UCE 4599. On another occasion, SULLIVAN provided multiple fraudulent credit cards to UCE 4599 using a fictitious name provided by UCE 4599 to SULLIVAN. During the investigation, there have been multiple conversations with UCE 4599 about the details of the

drug operation of KEITH JACKSON, BRANDON JACKSON and SULLIVAN involving the interstate distribution of drugs. One particular conspiracy involved the purported sale of cocaine to KEITH JACKSON, BRANDON JACKSON and SULLIVAN, from UCE 4599's purported drug connection on the east coast.

The criminal relationship further developed between UCE 4599 and KEITH JACKSON, BRANDON JACKSON, SULLIVAN. BRANDON JACKSON then introduced one of his sources of supply for firearms, later identified as Rinn ROEUN.

ROEUN sold multiple firearms to UCE 4599 and, during a series of conversations, told UCE 4599 he [ROEUN] was willing to commit murder for a fee at the request of UCE 4599.

In addition to his relationship with CHOW and the CKT, KEITH JACKSON is also a close associate of, and has a long-time relationship with, SENATOR YEE. KEITH JACKSON owns and runs a business called "Jackson Consultancy," a San Francisco based consulting firm. During the time frame from at least May 2011 through the present, KEITH JACKSON has been involved in raising campaign funds for SENATOR YEE. This includes raising funds for SENATOR YEE's campaign during SENATOR YEE's run in the San Francisco mayoral election held on November 8, 2011; to retire SENATOR YEE's debt from the mayoral campaign; and for SENATOR YEE's current campaign in the California Secretary of State election to be held in November 2014.

Starting in May 2011, and continuing for several months, KEITH JACKSON solicited UCE 4599 to make contributions to SENATOR YEE's San Francisco mayoral campaign. These solicitations included asking UCE 4599 for donations in excess of the $500 individual donation limit. UCE 4599 declined to make any donations to SENATOR YEE, but introduced KEITH JACKSON and SENATOR YEE to a purported business associate, UCE 4773, another undercover FBI agent. KEITH JACKSON and SENATOR YEE then solicited UCE 4773 for campaign contributions, and UCE 4773 made at least one personal donation in the amount of $5,000 to SENATOR YEE's mayoral campaign.

After SENATOR YEE lost the November 8, 2011 election, he had at least $70,000 in debt from that campaign. The same $500 limit on individual donations applied to donations to retire that debt. After losing the election, and in anticipation of the expiration of his term as State Senator in December 2014, SENATOR YEE decided to run for election in the California Secretary of State race to be held in November 2014. In order to retire the mayoral debt before starting to raise funds for the Secretary of State campaign, beginning in early 2012 SENATOR YEE and KEITH JACKSON sought to raise money, and did raise money, in order to retire the mayoral campaign debt. This included soliciting UCE 4773 for additional donations and in the course of doing so, SENATOR YEE and KEITH JACKSON agreed that SENATOR YEE would perform certain official acts in exchange for the donations from UCE 4773.

In connection with efforts to retire the mayoral campaign debt, SENATOR YEE and KEITH JACKSON agreed that SENATOR YEE would make a telephone call to a manager with the California Department of Public Health in support of a contract under consideration with UCE 4773's purported client, and would provide an official letter of support for the client, in exchange for a $10,000 campaign donation. SENATOR YEE made the call on October 18, 2012 and provided the letter on or about January 13, 2013. On November 19, 2012, KEITH JACKSON accepted the $10,000 cash donation from UCE 4599, who was paying KEITH JACKSON and SENATOR YEE the money on behalf of UCE 4773.

In addition, over the course of 2012 and continuing to the present time, SENATOR YEE and KEITH JACKSON have raised money and campaign funds for Senator YEE's Secretary of State campaign by soliciting donations from UCE 4599 and another FBI undercover agent, UCE 4180. They agreed that in exchange for donations from UCE 4599 and UCE 4180, SENATOR YEE would perform certain official acts requested by UCE 4599 and UCE 4180.

In connection with efforts to raise funds for the Secretary of State campaign, SENATOR YEE

and KEITH JACKSON agreed to UCE 4599's request that SENATOR YEE provide an official State Senate proclamation honoring the CKT in exchange for a $6,800 campaign donation, the maximum individual donation amount allowed by law. SENATOR YEE arranged to provide the proclamation and one of his staff members made the official presentation of the proclamation on SENATOR YEE's behalf at a CKT anniversary celebration on March 29, 2013. On May 6, 2013, UCE 4599 provided a $5,000 check payable to "Leland Yee Secretary of State" to KEITH JACKSON; on July 11, 2013, UCE 4599 provided a second check to KEITH JACKSON, this time for $1,800, made payable to "Leland Yee Secretary of State."

Also as part of SENATOR YEE's and KEITH JACKSON's efforts to raise money for the Secretary of State race, SENATOR YEE and KEITH JACKSON agreed that in exchange for campaign donations, SENATOR YEE would introduce a donor to state legislators who had influence over pending and proposed medical marijuana legislation, an area in which the donor purportedly had significant business interests. The donor was another FBI undercover agent, UCE 4180, who was posing as a businessman involved in medical marijuana in Arizona and who wanted to expand his business interests to California. On June 20, 2013, SENATOR YEE made one such introduction and in payment for that introduction, UCE 4180 delivered $11,000 cash to SENATOR YEE and KEITH JACKSON on June 22, 2013. On August 26, 2013, SENATOR YEE introduced UCE 4180 to another legislator, and on September 17, 2013, UCE 4180 gave SENATOR YEE and JACKSON $10,000 in cash as payment for that introduction.

In a further attempt of KEITH JACKSON and SENATOR YEE to gain more money from UCE 4599, in August 2013, KEITH JACKSON told UCE 4599 that SENATOR YEE, had a contact who deals in arms trafficking. This purported arms dealer was later identified. JACKSON requested UCE 4599 to provide a campaign donation on behalf of SENATOR YEE, for SENATOR YEE to facilitate a meeting with the arms dealer with the intent of UCE 4599 to purportedly purchase a large number of

weapons to be imported through the Port of Newark, New Jersey. During a meeting with UCE 4599, SENATOR YEE, and KEITH JACKSON, SENATOR YEE discussed certain details of the specific types of weapons UCE 4599 was interested in buying and importing.

It should be noted that throughout this investigation, CHOW has made several exculpatory statements about how he strives to become legitimate and no longer participates in criminal activity.

For example, CHOW has previously discussed how he had $50,000 in his bank account that he set aside to get his book published. CHOW stressed that those funds were absolutely legitimate. Further into the conversation, CHOW stated that he now promoted "grand ideas." CHOW stated that law enforcement was looking to put CHOW away, and that there were "snitches" out there who were using CHOW to direct law enforcement attention onto CHOW. CHOW said that he did not care, because what was happening "out there" had nothing to do with him.

As another example, CHOW stated that he had a potential book deal and movie proposition regarding his life. CHOW stated the deal was for $3 million. CHOW said he did not want to sign the deal, because he wanted control of production of the story. CHOW added that community leaders from Sacramento asked CHOW to give lectures on the evils of alcohol and drugs, and that CHOW earned $200 each time he gave such a lecture.

In addition, during multiple meetings with UCE 4599, CHOW has repeatedly referred to "legitimate" business, including the possibility of publishing an autobiography and possibly producing a movie regarding his life.

Similarly, in October of 2011, CHOW said that he was broke, but that people did not believe him. UCE 4599 responded that for a broke person, CHOW had a lot of nice clothes and jewelry. CHOW explained that he did not understand why people gave him things all the time.

In February of 2012, in regards to the transportation and sale of a shipment of stolen liquor, CHOW told UCE 4599 that he did not know that UCE 4599 did not have a liquor license. UCE 4599

explained that he did not have a liquor license, and that the only license he had was to do whatever business he wanted to. CHOW explained he didn't want to know the details of the liquor deal and said that UCE 4599 and NIEH were outlaws. CHOW asked "How am I hanging out with outlaws like this?" NIEH pointed to CHOW and said "you are an outlaw too." CHOW laughed and replied "I'm innocent, I don't have no knowledge of the crimes you commit to pay for my meal, that is very bad." (However, it should be noted that CHOW continued to say, "I'm still eating though, I'm hungry." CHOW then asked NIEH, "What side are you on man, are you on the prosecutor's side or something?" NIEH explained that he was in the middle. CHOW replied "I'm good with the outlaw thing man.")

CHOW has also been portrayed in many Chinese newspapers as being involved in community affairs and has been photographed posing with local politicians and other community leaders. For example, in August of 2006, CHOW was photographed holding a Certificate of Honor from the San Francisco Board of Supervisors for community service of the CKT.

Nonetheless, while making these self-exculpatory statements and references to apparently legitimate business activity, CHOW also frequently makes inculpatory statements confirming his knowledge of and involvement in criminal activity, as further detailed below. CHOW's involvement in illegal activity is discussed in further detail below, but in sum, CHOW has repeatedly accepted payments from UCE 4599 as a fee for allowing UCE 4599 to engage in money laundering with NIEH, CHIU, SIU and others, and has told UCE 4599 that while he, CHOW, does not engage in criminal activity himself, he knows what is going on in his organization and approves of all criminal activity. Using his influence and position within the CKTCE, CHOW continued to sanction introductions and criminal activity between UCE 4599 and CHOW's associates and continued to receive payments from UCE 4599 for his involvement in facilitating those criminal activities. CHOW continued to introduce multiple individuals to UCE 4599. Early in the investigation, CHOW approached UCE 4599 and others about schemes to illegally ship what CHOW described as "military-grade" tungsten between the United

States and China. CHOW also helped to arrange a deal to sell and ship purportedly stolen liquor from the United States to China.

It should also be noted that in the course of the investigation, SENATOR YEE has made exculpatory statements about how he is not interested in making money for himself, and complaining about the way UCE 4180 openly discussed how much he was willing to pay SENATOR YEE for certain official acts. In terms of the latter, SENATOR YEE periodically complained to KEITH JACKSON and others that talk like that is "pay to play," and said that he could not do that. He also added that contributions could not be linked to any items, bills, or amendments.

Despite complaining about UCE 4180's tendency to speak frankly and tie payment to performance, and threatening to cut off contact with UCE 4180, SENATOR YEE and KEITH JACKSON continued to deal with UCE 4180 and never walked away from quid pro quo requests made by UCE 4180. In fact, SENATOR YEE provided the introductions sought by UCE 4180 and accepted cash payments which UCE 4180 expressly tied to the making of the introductions.

Below I describe in detail undercover operations involving UCE 4599 and Targets identified in Section I of this Affidavit, along with others that were recorded either using body wire recorders, closed circuit television (herein "CCTV"), or via court authorized T-III intercepts. Unless otherwise noted, the facts detailed below were recorded and/or observed by UCE 4599 and/or other UCEs during conversations and interactions with CHOW, YEE, and/or their associates.

B. EARLY CONVERSATIONS WITH CHOW AND ASSOCIATES

In some of the earliest meetings, CHOW discussed illegal activities and making introductions for the UCEs to commit illegal acts. CHOW stated that he could not be involved in committing any of the acts, but that he could make introductions. At the very first meeting between CHOW and UCE 4527, CHOW boasted that he could move hundreds of kilos of drugs if he wanted to, but that he did not.

On June 28, 2010, CHOW went on a chartered fishing boat with UCE 4527 and 4599 off of the North Shore of Oahu. During the boating trip, they discussed potential business. CHOW indicated that he could get "military grade" Tungsten from China for cheap. He was also interested in exporting high end alcohol (like Remy or Hennessey) to China through contacts. These offers were not followed up on by the UCEs.

On July 23, 2010, UCE 4599 had dinner with CHOW and George NIEH. CHOW and NIEH discussed what types of guns they prefer. CHOW described how he used to carry two 9mm and a .45 caliber. CHOW described that a .22 caliber is an assassin's gun, but he liked carrying something that had real power and would stop someone if you had to use it on the street. He described shootings and pistol whippings that he had done in the past.

On August 5, 2010, UCE 4599 was introduced by CHOW to Keith JACKSON and others. CHOW told UCE 4599 that JACKSON has a lot of political influence and can do "inside deals" with the City. CHOW explained that he met Keith JACKSON when JACKSON approached CHOW to try to get support for the development in the Bayview/Hunter's Point area of the City. Later that same night, CHOW asked UCE 4599 about distributing illegal diesel that CHOW stated he could get for "under market prices" from China.

On December 16, 2010, UCE 4527 talked with CHOW. UCE 4527 vouched for UCE 4599 to do business with CHOW's people, like Kevin SIU. CHOW asked about what sort of business, and UCE 4527 talked about illegal cigarette trafficking. CHOW warned against that business, since they were already doing so well. CHOW said he had turned down similar deals in the past.

On February 10, 2011, SIU and UCE 4599 met in Las Vegas, Nevada. During that meeting, SIU stated that CHOW had approved for SIU to do business with UCE 4599. SIU and UCE 4599 discussed trafficking in marijuana and cocaine. SIU said that he wanted to make it clear that CHOW had nothing to do with their discussions about drug trafficking. UCE 4599 told SIU that he better take care of

CHOW out of respect and SIU said "a deal is a deal." SIU said CHOW gave the okay to work with UCE 4599, but that CHOW had nothing to do with any illegal activities. SIU pulled out a gun and put it on the table while giving UCE 4599 a sample of cocaine to test. They discussed SIU laundering money for UCE 4599, for a 10% profit.

C. CONVERSATIONS REGARDING THE CKT AND HST

Through his lengthy relationship with CHOW, NIEH, SIU, CHIU, and others, UCE 4599 has been exposed to many conversations regarding the conduct, organization, membership, and operation of the Chee Kung Tong (CKT) and the Hop Sing Tong (HST). Almost all of those conversations were recorded and are repeated throughout this memorandum. In March of 2012, UCE 4599 was also inducted into the CKT as a "Consultant" to the enterprise. He was, from that point on, further entrusted with conversations regarding the membership and conduct of the enterprise. UCE 4599 has also attended and recorded many CKT events, including their annual banquets. UCE 4599 also bribed California State SENATOR LELAND YEE and KEITH JACKSON to obtain a proclamation from the California Senate on behalf of the CKT. UCE 4599 was present at a CKT function when the proclamation was presented by one of SENATOR YEE's staff members.

CHOW has described himself, and been described by others, as the Dragonhead of the CKT. He uses the numeric title of "489." George NIEH has described himself as a soldier in the organization, but has also stated that he will not take an officer's role due to his active criminal activities. James PAU described his position within the CKT as an organizer, and the number "415." Leslie YUN also described herself, and was described by others, as a bookkeeper for the CKT. Kongphet "Joe" CHANTHAVONG described himself as the Head of Security. Andy LI described himself, and was described by others, as the head of enforcement for the CKT. Ming MA has described himself, and gave UCE 4599 a business card, showing his position as a soldier in the CKT. KEITH JACKSON was sworn into the CKT as a Consultant, the same position given to UCE 4599.

On March 19, 2011, the day following an annual CKT banquet, CHOW described to UCE 4599 that the placing of a black lion outside of the banquet restaurant was to send a message of intimidation to all other organizations that CHOW's organization was the oldest and strongest.

On April 13, 2011, NIEH described his history and CHOW's history as gang leaders. NIEH said he was in charge of the Wah Ching gang and CHOW was in charge of the Hop Sing gang. NIEH said they used to be enemies, but banded together instead. CHOW described that he had nothing to prove as a tough guy any longer, but that if anything happened to him, the person who did it would pay a tremendous price and their life would disappear. CHOW said he always had a group to shadow him for protection. At one point while music was loud in a club, CHOW told UCE 4599 that while he, CHOW, does not engage in criminal activity himself, he knows what is going on in his organization and approves of all activity.

On May 6, 2011, NIEH told UCE 4599 that he and CHOW believed that SIU was a rat and was cooperating with the police. NIEH stated that if they thought someone was a rat they would kill them or chop off their tail.

On May 25, 2011, UCE 4599 went to dinner with CHOW, NIEH and KEITH JACKSON. CHOW spoke about his position as the Dragonhead and explained that if one of his members had an argument and killed another member, CHOW would act as a judge to see if the killing was justified, and then make a ruling. During dinner, KEITH JACKSON requested that UCE 4599 contribute $500 to SENATOR YEE's campaign for Mayor of San Francisco. CHOW explained that SENATOR YEE only realizes now the influence CHOW has on the Chinese community. CHOW later stated that he helped SENATOR YEE enough already. NIEH explained that SENATOR YEE made a big mistake by not supporting CHOW on one occasion.

On September 22, 2011, NIEH described CHOW as a member of the Triad and that he had to do everything "under the table." NIEH described himself as a gangster.

On October 19, 2011, CHOW stated that he had not felt threatened in a long time. CHOW said he did feel threatened about five years earlier. CHOW said that the last time someone posed a threat to CHOW, CHOW "dropped him." CHOW also described his loyalty to his Dai Lo earlier in his career and compared CHANTHAVONG's current loyalty to CHOW. I am aware that "Dai Lo" is a term meaning "Big Brother." In the context of Asian organized crime, it is a term indicating a higher rank in the organization, or a boss, and is a term of respect.

On November 17, 2011, NIEH described to UCE 4599 a run in at the HST headquarters between CHOW's people and people who supported a rival Hop Sing Tong member. NIEH told UCE 4599 that NIEH and CHANTHAVONG were positioned outside of the headquarters and carrying firearms to protect CHOW. When they saw SFPD officers at the event, they then hid their guns across the street in a restaurant bathroom. Later that night, CHOW described to UCE 4599 the animosity between himself and the rival and that CHOW was removing his protection from that rival so that the rival could be killed by anyone. CHOW said that he received a call after the HST meeting from a supposed follower of his rival, who told CHOW that his rival was not the real Dai Lo; CHOW was the real Dai Lo.

On January 18, 2012, while traveling in Las Vegas, NIEH told UCE 4599 that he stabbed a man in Hong Kong in order to gain admission into the gang. NIEH also told UCE 4599 that CHOW was considering leaving the HST in an effort to determine who CHOW's real allies were. NIEH told UCE 4599 that he would be sworn into the CKT on March 16, 2012, at the annual CKT dinner event. NIEH said that he and CHOW would show up to the event late to avoid any potential encounters with law enforcement. NIEH told UCE 4599 that CHOW had asked for a favor – CHOW wanted to know if UCE 4599 would ask UCE 4773 to ask SENATOR YEE to assist in removing CHOW's ankle monitor. NIEH described the history of the Chinese Tongs.

On January 25, 2012, CHOW discussed how the U.S. Department of Justice is waiting for him to slip up so that they can charge him, but that it will not work because CHOW knows what they are doing.

CHANTHAVONG later talked to UCE 4599 and explained that Andrew LI, a/k/a Andy LI, is a little higher than CHANTHAVONG in the CKT. CHANTHAVONG described CHOW as the boss of LI and CHANTHAVONG. CHANTHAVONG said he had five people hand-picked under him. CHANTHAVONG said that when CHOW was elected Dragonhead, he made CHANTHAVONG his personal security. Later that night, CHOW described to UCE 4599 that, although he was not involved in any criminal activity, he had some pretty rough people in the city if he needed them. CHOW described that he was aware of what was happening in the streets and if his members have problems with each other, then CHOW mediates. CHOW said members come to him to discuss his opinions on how to handle situations. In a discussion with LI, LI told UCE 4599 that he came back to the Bay Area to handle CHOW's problems with his rival in the HST. LI said that he would pretend that there was a falling out between LI and CHOW so that he could get close to CHOW's rival and then "get rid of the bugs."

On February 16, 2012, CHOW discussed with UCE 4599 that CKT members from New York would be attending the March 2012 CKT event in San Francisco. CHOW said the New York members were asking CHOW for promotions. CHOW said each had to explain to CHOW what they had done in the past three years that would get them a promotion. CHOW said the New York members needed to "earn their stripes." CHOW explained that the CKT in San Francisco is the original CKT in the United States.

On March 16, 2012, UCE 4599 attended an annual event sponsored by the CKT. During that event, UCE 4599 and KEITH JACKSON were both inducted into the CKT as Consultants. CHOW presented UCE 4599 with a certificate signifying his role in the CKT as Consultant. CHANTHAVONG was there and said that "when Old Man [CHOW] says you are family, then you are family." CHANTHAVONG said that if UCE 4599 ever needed anything, CHANTHAVONG would have his "guys take care of it." CHANTHAVONG described that he had five guys who were a "Black

Operations Team" that swore loyalty to CHANTHAVONG only but that CHANTHAVONG's loyalty is to CHOW. CHANTHAVONG described getting into fights and talked about selling guns to UCE 4599. CHANTHAVONG said it would be hard to get UCE 4599 a "clean" gun and he didn't want to supply one with "four or five bodies on it."

On April 19, 2012, NIEH described that they should stop working on money laundering deals with Alan CHIU since CHIU was dropping out of the CKT. NIEH said that "if we are not together then I don't trust you." NIEH said he was seeking CHOW's authority to prevent CHIU from working with UCE 4599 since CHIU would not be CKT any longer.

On April 20, 2012, CHOW described to UCE 4599 that if he ever got "hit," there would be a lot of people to avenge his death.

On May 3, 2012, NIEH, James PAU and Leslie YUN described that they needed CHOW's authorization to work with UCE 4599 on laundering money. PAU described how he had left the CKT and then re-joined the organization after 10 years.

On May 6, 2012, CHOW and NIEH talked with a recording device in NIEH's vehicle, authorized by Court Order. CHOW described the need for YUN and PAU to be very careful when working with UCE 4599. CHOW described that everyone close to CHOW had an official position in the CKT. CHOW described that even if CHOW didn't do anything, he and the CKT would be stuck at the end and dragged into it because of the CKT relationship. CHOW said that was why he didn't want the officials close to him doing any of this stuff. CHOW said he was afraid of the CKT being tagged as an "underworld society" and "participating in organized crime." CHOW said whenever members of the CKT get together they would be "participating in organized crime." CHOW said that's all he was worried about, but, of course, he wanted to make money. CHOW said he didn't want the CKT involved. NIEH pointed out that SIU and CHIU were already working on it [laundering money with UCE 4599]. CHOW said that those two didn't hold important positions, but YUN is in charge of the CKT bank

accounts and holds the books. CHOW said law enforcement would try to press YUN to get to CHOW. CHOW said people who "rat" on him would be safe in the end and that CHIU was someone who would "rat" anyone out. CHOW said that if he got ratted out, he would claim that he had only introduced the relationship, and that he did not know what they were doing. CHOW said even if he knew what they were doing, he never witnessed the transactions. CHOW said he would claim that he knew those people talked to each other, that's all. CHOW said that is why CHOW says not to tell CHOW anything when giving a report of what is happening. CHOW did not want to know anything because he would not be guilty if he did not know anything. NIEH said he told UCE 4599 not to say too much on the phone also. CHOW said his associates made that mistake by using phones and that was what got them in trouble.

On July 19, 2012, NIEH and UCE 4599 talked about the CKT. NIEH said because he had a criminal history, he couldn't take a position with the CKT or else law enforcement could classify the CKT as a "mafia" organization. UCE 4599 asked why that didn't keep CHOW from taking an official position. NIEH said that if NIEH would stop committing crimes then he could take a position. NIEH said the Hung Moon is a criminal organization in China, but not in the United States. UCE 4599 said it walks a fine line between legitimate and illegitimate and NIEH agreed.

On July 26, 2012, UCE 4599 talked to NIEH and said whatever crimes he committed with the CKT, he would take care of CHOW and NIEH. NIEH told UCE 4599 to be careful talking with CHOW openly about criminal activities because CHOW was afraid of being overheard by law enforcement. NIEH said CHOW did not know about the stolen cigarette deals with YUN. UCE 4599 disagreed that CHOW did not know since NIEH had previously told CHOW that UCE 4599 "rips off trucks." UCE 4599 agreed to try to keep CHOW out of conversations. NIEH said that CHOW serves a purpose by attracting attention from law enforcement and allowing everyone else to commit crimes. NIEH said he pays half of what he makes to CHOW.

On September 7, 2012, UCE 4599 talked with NIEH about a disagreement between CHOW and

YUN over a CKT event. YUN thought CHOW needed to treat people better. YUN also accused NIEH of only hanging around CHOW, but not helping to run the CKT. NIEH explained how hard it was to hang out with CHOW and that NIEH could take a bullet at any time protecting CHOW. NIEH told UCE 4599 that CHOW had summoned "gangsters" of the CKT to help run the event.

On September 8, 2012, UCE 4599 attended the CKT event in a restaurant in San Francisco Chinatown. At the dinner, UCE 4599 saw CHOW, NIEH, YUN, MA, PAU, MEI, and SIU. UCE 4599 sat at a table with KEITH JACKSON and his son, BRANDON JACKSON. UCE 4599 agreed to meet with the JACKSONS regarding sale and transportation of narcotics.

On September 20, 2012, UCE 4599 talked to NIEH about whether another individual was a Triad member. The other person was interested in paying UCE 4599 to smuggle bulk cash from Canada into the United States. NIEH said he could "smell a Triad." NIEH showed UCE 4599 the Triad hand shake. UCE 4599 said he had seen CHOW do that same hand shake with certain people. NIEH confirmed that CHOW's Triad number was "489" and that all Triad ranks have a corresponding number. As UCE 4599 was negotiating with the other person, NIEH explained that the other person could trust UCE 4599 to transport large sums of money because "our Tong [the CKT] will be the middle person to watch out for both sides," meaning that the CKT would insure the transaction. NIEH said about NIEH and UCE 4599, "we know each other because of the Tong."

On January 10, 2013, PAU described the following: PAU said CHOW's position as Dragonhead was a lifetime position. PAU said CHOW would work on his book and take care of "family business and community business." PAU said "we do all the work for him." PAU explained it was CHOW's responsibility to support his people when they conducted illegal business. UCE 4599 described how in a prior cigarette deal, UCE 4599 and his people could have easily robbed the people buying the cigarettes. PAU said his associates trusted UCE 4599 because his associates trusted CHOW. PAU said "they trust Dai Lo, that's why he's worth so much, that's why he don't have to do nothing." PAU told the UCE he

and CHOW were recruited into the HST together. PAU explained everyone within the HST had a role and responsibility within their organization. PAU talked about the importance of having a good Dai Lo. PAU and CHOW's original Dai Lo within the HST allowed CHOW and PAU to engage in as much criminal activity as they could handle. When they were successful, they were promoted and were given a "crew." PAU talked about CHOW's rise to power as the Dragonhead of the CKT. PAU told the UCE that CHOW's predecessor as the head of the CKT, Allen Leung, was murdered and CHOW stepped up to be the new leader of the CKT. UCE 4599 told PAU from what he heard on the street, Leung deserved to be murdered. PAU smiled and said "no comment." PAU showed UCE-4599 the official handshake for members of Triad Societies. PAU explained known members of Triad Societies in Hong Kong could be imprisoned for up to three years because of their affiliation with the Triad. PAU told the UCE, CHOW's official number within the Triad was "489." PAU explained his number within the Triad was "415". PAU demonstrated the hand sign for "415" and explained his duties within the Triad were focused on planning and gathering resources. For example, if CHOW asked for the assistance of 30 soldiers within the CKT, PAU would be responsible for recruiting the help needed for the operation. An individual classified as number "49" within the Triad was considered an ordinary or basic member. PAU stated that he believed the FBI had opened many organized crime cases against Triad members over the years. Since that time, many secrets of the Triad Societies have been revealed. PAU explained there are a legitimate side and an illegitimate side of the CKT. The legitimate side of the CKT focused on serving the Chinese community and its members. The illegitimate side of the CKT focused on illegal activities that made the CKT and its members money. PAU believed Italian organized crime families only had an illegitimate side.

On January 19, 2013, NIEH and CHOW had a telephone call that was intercepted pursuant to Court Order. During the call, CHOW referenced giving others, including CHIU, directions and kicking people out of the "Association," demonstrating CHOW's control over others. They also discussed a

recent trip that NIEH took to Las Vegas where he met with an associate of UCE 4599, another UCE, who posed as a member of the entertainment industry who also laundered money for UCE 4599.

On January 19, 2013, NIEH had a conversation in his car with another person, intercepted pursuant to Court Order. During the conversation, NIEH related that CHOW was upset about management issues in both the CKT and HST.

On March 29, 2013, UCE 4599 attended an annual CKT dinner event. Present at the event were CHOW, YUN, LI, Albert NHINGSAVATH, NIEH, CHANTHAVONG, KEITH JACKSON, Michael MEI, PAU, BRANDON JACKSON, and Marlon SULLIVAN. A representative for SENATOR YEE attended and presented a Senate proclamation to recognize the CKT. CHANTHAVONG told UCE 4599 that LI was the new "enforcer" for the CKT. LI discussed different ways to kill people and described that he had a crew of people. LI discussed that CHOW had taught him to keep people you wanted to kill close to you. CHANTHAVONG told UCE 4599 that if he ever needed someone taken care of, that CHANTHAVONG had "niggas that can take you out from 500-1000 yards."

On April 17, 2013, CHOW discussed with NIEH and UCE 4599 how people used to be able to get away with a lot more crimes because law enforcement did not have the same sophisticated techniques as they have now. CHOW explained that there were a lot of smaller criminal crews in the Bay Area with their own leaders. CHOW described that he was not the leader of these smaller crews, but when CHOW "calls them out" they all come out to support CHOW. CHOW said "if anyone fucks with me, they are done for." CHOW told UCE 4599 that if UCE 4599 had any issues with any of CHOW's associates, UCE 4599 should let CHOW know.

On July 18, 2013, UCE 4599 met with YUN and PAU in Flushing, New York. PAU reiterated that his position in the CKT was "415," the "white paper fan." PAU said that YUN was the bookkeeper for the Tong. PAU described that NIEH and CHANTHAVONG were responsible to protect CHOW. LI was "426" within the Tong, which made him a fighter, and made the shape of a gun with his hand. PAU

said that he, PAU, would be responsible for making the call on a hit and LI would be responsible for carrying it out. PAU said that CHOW encouraged them to grow their illegal business by working with cultures outside of the Chinese community. PAU said that LI works directly with CHOW.

On August 11, 2013, NIEH and UCE 4599 discussed doing business with the 14K Triad. NIEH told UCE 4599 to be careful and said the 14K and the CKT were very similar in the sense that they were both Triad organizations. NIEH further described that he told CHOW about every illegal business opportunity that UCE 4599 had conducted with NIEH. NIEH said CHOW wanted to know and engaged by making calls on behalf of UCE 4599. UCE 4599 said that CHOW, as Dragonhead, needed to know what was going on, but be protected from law enforcement. NIEH said "exactly, clean his image."

D. CRIMINAL ACTS COMMITTED BY THE TARGETS

In late February 2011, both SIU and NIEH discussed laundering money for UCE 4599, for 10% profit. UCE 4599 described to SIU and to NIEH that his money on the West Coast came from illegal gambling and from marijuana trafficking.

On February 24, 2011, UCE 4599 had dinner with CHOW, SIU, and NIEH. SIU picked UCE 4599 up and told UCE 4599 that he was setting up a fictitious Limited Liability Company (LLC) through which he could launder UCE 4599's money, up to $50,000 per month. SIU also volunteered to make collections of money for UCE 4599. During dinner, at a point, SIU and CHOW got up to go to the bathroom, leaving NIEH and UCE 4599 at the table. NIEH told UCE 4599 that, if they had opportunities to work together, that would help out CHOW. Later, at a bar, NIEH told UCE 4599 that NIEH would be willing to launder money for UCE 4599. NIEH said that CHOW gave NIEH instructions to work with UCE 4599. NIEH said he would take care of CHOW and kick some of the profits from laundering money up to CHOW.

During a dinner banquet for the CKT on March 18, 2011, NIEH said that he would kick up a portion of his fees for money laundering to CHOW, because CHOW was the "Big Brother" and had to

be taken care of. UCE 4599 told NIEH that he had an envelope for CHOW for giving him the opportunity to work together. Immediately following that dinner, UCE 4599 gave an envelope with $1000 cash to CHOW and told CHOW that it was for the opportunity to work with NIEH and SIU. CHOW took the envelope and hugged UCE 4599 and told him that he loved him. CHOW said that all of his brothers would take a bullet for CHOW. UCE 4599 told CHOW that he would take a bullet for CHOW as well.

On March 19, 2011, UCE 4599 conducted a reverse money laundering deal with both NIEH and SIU for $20,000 each. A reverse money laundering deal is a phrase referring to the targets "laundering" money, that is conducting a financial transaction with funds that a UCE represents to the targets is proceeds of specified unlawful activity – here, gambling and narcotics trafficking – with the intent to conceal or disguise the true nature, source and ownership of the funds and/or to promote the carrying on of the underlying specified criminal activity. Such an act violates Title 18 United States Code, Section 1956(a)(3)(A) and (B).

On March 19, 2011, each NIEH and SIU were paid $2,000 for conducting the transactions (10% of the amount laundered). UCE 4599 gave NIEH $2,000 in cash as a fee, and then gave NIEH $20,000 more in cash to be laundered. In exchange, NIEH wrote a personal check made payable to a fictitious business account for UCE 4599 in the amount of $20,000 and postdated the check. The check was written on an account at East West Bank, a financial institution under Title 18, United States Code, Section 1956(c)(6). NIEH told UCE 4599 that he would set up a fictitious company to conduct future money laundering transactions. Separately on that same date, UCE 4599 met with SIU. UCE 4599 gave SIU $2,000 in cash as payment. UCE 4599 then gave SIU $20,000 in cash and an extra $400 cash to cover SIU having to set up a fictitious company. SIU explained that he would do a series of deposits with the cash, and then return UCE 4599's money within five days. On March 25, 2011, the check from NIEH was successfully deposited into UCE 4599's fictitious account and on March 28, 2011, $20,000

was wire transferred into UCE 4599's fictitious account from an account in the name of Dynamic Investment Consultant Company. The sole proprietor of Dynamic Investment Consultant Company is SIU.

On March 29, 2011, UCE 4599 discussed money laundering with NIEH and NIEH encouraged UCE 4599 to keep giving CHOW money as tribute for allowing them to work together. NIEH said he also would kick money up to CHOW as things progressed and that CHOW knew what the money was for.

On April 12, 2011, UCE 4599 conducted a reverse money laundering deal with SIU for $40,000 and paid SIU $4,000 for conducting the transaction. On April 12, 2011, UCE 4599 paid SIU $44,000 in cash. On April 25, 2011, SIU sent a $40,000 wire transfer from a Bank of America account for a fictitious LLC set up by SIU – Dynamic Investments – to UCE 4599's fictitious business account. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B) by SIU.**

On April 13, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for $40,000 and paid NIEH $4,000 for conducting the transaction. NIEH told UCE 4599 that NIEH had set up a fictitious company for the purpose of laundering UCE 4599's money and that had cost him $495. UCE 4599 gave NIEH another $500 cash to cover the expense. NIEH told UCE 4599 that the company he set up was called G&S Consulting Company. NIEH wrote three separate checks to UCE 4599's fictitious company, two for $15,000 and one for $10,000. All three checks were from an account with East West Bank. On April 20, 2011, the three checks were deposited into the account of UCE 4599's fictitious bank account and cleared. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B) by NIEH.**

On May 4, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for $60,000 and paid NIEH $6,000 for conducting the transaction.

On May 25, 2011, UCE 4599 paid CHOW $1,000 for allowing him to work with NIEH and SIU. Specifically, UCE 4599 said that things were good between NIEH and UCE 4599 and handed CHOW a white envelope with cash. CHOW immediately placed the envelope in the pocket of his sport coat, then told UCE 4599, "no no no, you guys don't have to do that." CHOW then hugged UCE 4599. UCE 4599 repeated that everything was good. CHOW asked, "what do you guys have going? It must be something bad." CHOW looked at NIEH; NIEH nodded affirmatively.

On May 26, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for $110,000 and paid NIEH $11,000 for conducting the transaction. On the same date, UCE 4599 conducted a reverse money laundering deal with SIU for $50,000 and paid SIU $5,000 for conducting the transaction.

On June 16, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for $110,000 and paid NIEH $11,000 for conducting the transaction. On the same date, UCE 4599 conducted a reverse money laundering deal with SIU for $60,000 and paid SIU $6,000 for conducting the transaction.

On July 14, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for $120,000 and paid NIEH $12,000 for conducting the transaction. UCE 4599 reiterated that the source of the money was gambling and marijuana trafficking. UCE 4599 gave NIEH $132,000 in cash. NIEH counted the money and UCE 4599 stated that $12,000 was the fee for laundering. NIEH provided UCE 4599 with four postdated $30,000 checks made out to UCE 4599's fictitious business account. Two of the checks were from a Bank of America account and did not have a name of an account holder. Two of the checks were from an East West Bank account, in the name of George NIEH and another person. On July 22, 2011, checks provided to UCE 4599 by NIEH were deposited into UCE 4599's fictitious business account and subsequently cleared for deposit. Following the transaction, UCE paid CHOW $1,000 for allowing him to work with NIEH. UCE 4599 gave CHOW an envelope containing $1,000 in

cash. CHOW immediately said "no, no, no," but opened his sports coat to reveal an inside pocket. UCE 4599 placed the envelope in the inside pocket of CHOW's sports coat. CHOW then hugged UCE 4599. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1956(a)(3)(A) and (B) and 2 by NIEH and CHOW.**

Also on July 14, 2011, NIEH told UCE 4599 that CHOW preferred that UCE 4599 work with Alan CHIU to conduct future deals, not with SIU any longer, as they were concerned that SIU was a "rat." UCE 4599 met with CHIU and described that his money comes from gambling and marijuana transactions. CHIU agreed to launder money for UCE 4599.

On August 1, 2011, UCE 4599 conducted a reverse money laundering deal with CHIU for $30,000 and paid CHIU $3,000 for conducting the transaction. UCE 4599 provided CHIU with $33,000 cash and advised CHIU that $3,000 was CHIU's fee for laundering the money. CHIU wrote out four checks totaling $30,000 from a Bank of the West account held by Alan CHIU and one other person to UCE 4599's fictitious business account. On the same date, UCE 4599 conducted a reverse money laundering deal with NIEH for $100,000 and paid NIEH $10,000 for conducting the transaction. On the same date, UCE 4599 paid CHOW $2,000 for allowing him to work with CHOW's people. CHOW stated "no, no, no" but took the envelope of cash and placed it in his sports jacket pocket. On August 5, 2011, three of the checks written by CHIU were deposited into UCE 4599's fictitious business account and subsequently cleared for deposit. On August 17, 2011, the last check from CHIU for $6,000 was deposited and subsequently cleared. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B) and 2 by CHIU and CHOW.**

On September 22, 2011, UCE 4599 conducted reverse money laundering deals with NIEH and CHIU. The deal with NIEH was for $120,000 and UCE 4599 paid NIEH $12,000 for conducting the transaction. The deal with CHIU was for $60,000 and UCE 4599 paid CHIU $6,000 for the transaction. On the same date, UCE 4599 paid CHOW $2,000 for allowing him to work with NIEH and CHIU.

UCE 4599 provided CHOW with an envelope that contained $2,000. CHOW placed the cash on the inside pocket of his sports coat and thanked UCE 4599.

On October 19, 2011, UCE 4599 conducted reverse money laundering deals with NIEH and CHIU. The deal with NIEH was for $120,000 and UCE 4599 paid NIEH $12,000 for conducting the transaction. The deal with CHIU was for $40,000 and UCE 4599 paid CHIU $4,000 for the transaction.

On November 17, 2011, UCE 4599 conducted a reverse money laundering deal with NIEH for $80,000 and paid NIEH $8,000 for conducting the transaction. On the same date, UCE 4599 paid CHOW $2,000 for allowing UCE 4599 to work with NIEH and CHIU. UCE 4599 handed CHOW an envelope containing $2,000. CHOW put the money on the inside pocket of his coat. UCE 4599 explained everything was going well for UCE 4599 and NIEH, and thanked CHOW. CHOW hugged UCE 4599. CHOW then said that NIEH was a really loyal brother.

On December 13, 2011, UCE conducted reverse money laundering deals with NIEH and CHIU. The deal with NIEH was for $80,000 and UCE 4599 paid NIEH $8,000 for conducting the transaction. The deal with CHIU was for $20,000 and UCE 4599 paid CHIU $2,000 for conducting the transaction. On the same date, UCE 4599 paid CHOW $2,000 for allowing UCE 4599 to work with NIEH and CHIU. UCE 4599 handed a white envelope containing $2,000 to CHOW and thanked CHOW for the opportunity to work with NIEH and CHIU. During dinner, CHOW inquired about UCE 4599's ability to get large amounts of liquor, referring to UCE 4599 previously stating that he could get liquor cheap as it was stolen. CHOW had a call with an unknown individual and asked if that other person wanted a container of Hennessey.

On January 23, 2012, UCE 4599 discussed CHOW setting up buyers of purportedly stolen alcohol with NIEH and then with CHOW. NIEH said that CHOW had made the introductions. CHOW explained that Tina [later identified as Tina LIANG] was lining up buyers in China.

On January 25, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for $70,000 and paid NIEH $7,000 for conducting the transaction. UCE 4599 discussed the potential liquor deal with NIEH. NIEH said CHOW wanted to know if UCE 4599 had given a quote for the liquor to TINA LIANG. UCE 4599 explained that the liquor was "hot," meaning stolen. NIEH said CHOW did not want any money from the liquor deal. UCE 4599 said CHOW always says that until he gets the money. NIEH laughed and said that when CHOW sees the money, it is different. NIEH and UCE 4599 went to examine a warehouse where CHANTHAVONG was getting ready to set up a marijuana grow. On the same date, UCE 4599 paid CHOW $2,000 for allowing UCE 4599 to work with NIEH and others. During a car ride to the Starlight Room, a nightclub in San Francisco, with CHOW and NIEH, UCE 4599 gave CHOW an envelope containing $2,000. UCE 4599 told CHOW that NIEH and UCE 4599 had a good year and thanked CHOW for the opportunity to work with NIEH. CHOW said thank you and that he knew NIEH and UCE 4599 had a good year. CHOW jokingly advised the UCE that NIEH is trouble maker. NIEH explained he was a "silencer" and he doesn't talk about business. UCE 4599 concurred and explained he is loyal to NIEH and CHOW and thanked CHOW again for the opportunity to work with NIEH. CHOW said he loved the UCE.

On February 2, 2012, CHOW, NIEH and UCE 4599 met for lunch. UCE 4599 told CHOW he had talked to Jane LIANG about selling purportedly stolen liquor. UCE 4599 expressed displeasure with how Jane LIANG negotiated. CHOW told UCE 4599 he should talk with Jane LIANG because Tina LIANG was in China and wanted Jane LIANG to follow up. UCE 4599 said he was not a liquor store and that they needed to have the money up front. NIEH said the LIANGs should know better than that, and if they wanted to get liquor legally, they should go to the liquor store. CHOW said "I don't need to know all this, you guys trouble, nothing but trouble makers." UCE 4599 said he would try to keep CHOW out of the deal as much as possible. CHOW said Tina LIANG needed to know the price since she was setting up buyers in China. CHOW told UCE 4599 he didn't know UCE 4599 didn't have

a liquor license and laughed. UCE 4599 said the only license he needed was to do what he wanted. CHOW said he didn't want to know details and that UCE 4599 and NIEH were outlaws. NIEH said to CHOW "you are an outlaw too." CHOW said "I'm innocent. I don't have no knowledge of the crimes you commit to pay for my meal, that is very bad. But I'm still eating though, I'm hungry." CHOW said to NIEH "are you on the prosecutor's side or something?" CHOW said "I'm good with the outlaw thing man."

On February 6, 2012, UCE 4599 and NIEH met with TINA LIANG. UCE 4599 told Tina LIANG that the liquor he had "fell off a truck," meaning it was stolen. TINA LIANG said she understood. UCE 4599 said he could sell it for $100 per bottle, including his costs for transporting it to California from New Jersey. TINA LIANG asked what other goods UCE 4599 could get. UCE 4599 told her it depended on what "fell off the truck." TINA LIANG said she understood. After they left, JANE LIANG called to discuss the name of the liquor and the size of the bottle. UCE 4599 said to NIEH that they would all make money off of the liquor deal. NIEH said that if CHOW didn't want a share, NIEH would take it. UCE 4599 said CHOW says he doesn't want a share until it comes time to pay and that CHOW allowed him to do the deal by making introductions. UCE 4599 said CHOW pretends that he doesn't know the liquor is stolen. NIEH said he told CHOW several times that the liquor was stolen, including once in front of UCE 4599.

On February 12, 2012, NIEH and CHOW were intercepted, pursuant to Court Order, talking in NIEH's vehicle. NIEH said he wanted to test if UCE 4599 was a "snitch." CHOW said NIEH wouldn't be able to tell and that if UCE 4599 was a snitch, he was a very good one. CHOW said if they drove UCE 4599 away, they would just make less money. NIEH said that UCE 4599 was interested in doing business with LI and CHANTHAVONG. CHOW said that if UCE 4599 thought he could set a bait through LI to catch CHOW, CHOW would isolate himself from UCE 4599's contacts with LI and

CHANTHAVONG and let them deal with themselves. CHOW said he did not want to know what they did and he could claim that he was not in that business.

On February 13, 2012, UCE 4599 conducted reverse money laundering deals with NIEH and CHIU. The deal with NIEH was for $60,000 and UCE 4599 paid NIEH $6,000 for conducting the transaction. The deal with CHIU was for $20,000 and UCE 4599 paid CHIU $2,000.

On February 14, 2012, NIEH assisted UCE 4599 in purchasing 4 pounds of marijuana from Kongphet CHANTAVONG for $5,000. CHANTHAVONG was introduced to UCE 4599 as a member of the CKT by CHOW and NIEH. **I believe this demonstrates probable cause for a violation of Title 21, United States Code, Sections 841 and 846 by NIEH and CHANTHAVONG.**

On February 16, 2012, NIEH and CHOW were intercepted talking about the liquor deal and CHOW advised NIEH how to steer the negotiations.

On February 16, 2012, UCE 4599 paid CHOW $2,000 for allowing him to work with his people. UCE 4599 presented CHOW with an envelope containing $2,000. UCE 4599 explained they had a good week with the outcome of the Super Bowl. CHOW stated he would not argue with UCE 4599 and said he loved UCE 4599. UCE 4599 told CHOW he could no longer get 100 cases of the liquor for Tina LIANG because he couldn't "sit on" it, and now it would be 50 cases of liquor. They discussed negotiating the deal with Tina and Jane LIANG.

On March 5, 2012, UCE 4599 and NIEH met with TINA LIANG to negotiate the sale of 50 cases of Hennessey XO. TINA LIANG stated she talked with CHOW on several occasions about the deal. TINA LIANG said she was concerned that the alcohol would be counterfeit, but that CHOW reassured her that the alcohol was not counterfeit and that UCE 4599 could be trusted. TINA LIANG then asked UCE 4599 if he could help her with bulk cash smuggling from New York to San Francisco.

On March 9, 2012, UCE 4599 sold purportedly stolen liquor to TINA LIANG, JANE LIANG, and Brian TILTON. The deal was set up by NIEH and CHOW. CHOW demonstrated that he believed

the liquor was stolen by talking to NIEH and scolding NIEH for talking about it over the phone when NIEH described it as liquor from the black market. The deal was 50 cases of Hennessey XO, purportedly stolen in New Jersey, and then transported to California, for $30,000 cash. TILTON assisted by paying the money to UCE 4599 and by testing the Hennessey XO to make sure that it was not counterfeit. On March 13, 2012, UCE 4599 gave CHOW $5,000 in cash as a payment for assisting in the liquor deal. They discussed TINA LIANG and her businesses. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 371, 2314, 2315 and 2 by Tina LIANG, Jane LIANG, Brian TILTON, NIEH and CHOW.**

On April 19, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for $70,000 and UCE 4599 paid NIEH $7,000 for the transaction. NIEH also provided UCE 4599 with a Rossi Firearms .22 caliber revolver and seven rounds of .22 caliber ammunition, free of charge.

On April 20, 2012, UCE 4599 paid CHOW $2,000. UCE 4599 presented CHOW with a white envelope containing $2,000. UCE 4599 informed CHOW he and NIEH had a great quarter and thanked CHOW for the opportunity to work with NIEH. CHOW said he would not argue with UCE 4599. UCE 4599 thanked CHOW again for the opportunity to work with NIEH. CHOW responded by saying, "I didn't give you that much opportunity, did I?" UCE 4599 and CHOW laughed.

On May 10, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for $60,000 and paid NIEH $6,000 for conducting the transaction.

As indicated above, CHOW had previously expressed that he did not trust CHIU to continue laundering money with UCE 4599. On May 2, 2012, CHOW was intercepted pursuant to Court Order talking with NIEH about whom to steer UCE 4599 to within the organization to launder money. CHOW expressed concern about using YUN because she was close to NIEH and had a lot of bank accounts. They discussed using James PAU, YUN's husband.

On May 3, 2012, UCE 4599 and NIEH met with YUN and PAU. During the ride to the meeting, NIEH and UCE 4599 discussed that CHOW didn't want UCE 4599 to use YUN to launder money because she handled CHOW's personal finances and for the CKT. NIEH recommended PAU to launder money. At lunch, when PAU and CHOW had walked away, UCE 4599 described to YUN that his money came from a Mendocino County marijuana operation and illegal gambling businesses. PAU joined the conversation after and UCE 4599 asked YUN how she would launder money with UCE 4599 and they discussed setting up a company. YUN and PAU expressed interest in laundering money for UCE 4599, but reiterated that they would need to get CHOW's permission to do it. YUN and PAU shook hands with UCE 4599. UCE 4599 asked YUN if she and PAU were going to approach the relationship with UCE 4599 as a team and YUN replied "yeah." NIEH then received a call from CHOW and handed the phone to YUN. YUN walked outside to speak with CHOW but the call was intercepted pursuant to Court order. CHOW told YUN she had a huge responsibility. YUN said she acknowledged that and that's why she would let PAU handle it. CHOW said they would discuss it later on. YUN said that she thought CHOW approved working with UCE 4599 early on and that's why she pursued it. CHOW said he did not approve. YUN said that NIEH told YUN that he had told CHOW. CHOW said there was nothing for him to say since it does not involve him. CHOW told YUN to call him when she is done with the matter. YUN returned to the table and UCE 4599 said he was buying lunch for his two new business partners (YUN and PAU). YUN told UCE 4599 that his sales pitch had worked. During the ride after, they discussed people in a real estate scam getting caught. PAU said people who use their brains to steal as opposed to a gun are his "heroes." UCE 4599 told PAU they would get along fine. PAU said "big cut, big risk" and advised UCE 4599 to keep everything under the radar. Later, NIEH told UCE 4599 that everything CHOW asked PAU and YUN to do was a favor to CHOW and that PAU and YUN did not receive payment for services. NIEH said CHOW was playing dumb when he talked to YUN at lunch and did not want to implicate himself.

On May 6, 2012, NIEH and CHOW were intercepted in NIEH's car discussing allowing YUN and PAU to launder money for UCE 4599. CHOW discussed how he stays out of the transactions, but that YUN is CKT and if she got caught, it would be bad for all of them. CHOW discussed his defense is that he doesn't really know what the rest of them were doing. On May 16, 2012, UCE 4599 conducted a reverse money laundering deal with Leslie YUN for $30,000 and paid her $3,000 for conducting the transaction. NIEH picked up UCE 4599 in his car and drove to Millenium Therapeutics, a massage parlor where YUN had an office. UCE 4599 provided YUN with $33,000 cash -- $30,000 to launder and $3,000 as payment for laundering. On May 22, 2012, $30,000 was wired from a Bank of America account held by YUN into UCE 4599's fictitious business account. On May 24, 2012, UCE 4599 paid CHOW $2,000 for allowing him to work with YUN and PAU. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B) and 2 by YUN, PAU, NIEH, and CHOW.**

On June 20, 2012, UCE 4599 conducted a reverse money laundering deal with YUN and PAU, with NIEH present. The deal was for $60,000 and UCE 4599 paid them $6,000 for conducting the transaction. NIEH told UCE 4599 that CHOW knew about the deals with YUN and PAU and that CHOW said "good luck." NIEH also discussed selling firearms to UCE 4599.

On June 27, 2012, UCE 4599 sold purportedly stolen liquor to Ming MA and Hon SO with assistance from NIEH. UCE 4599 sold 12 cases of Johnnie Walker Blue Label Scotch for $6,480 to MA and SO at the New Asia Restaurant in Chinatown, San Francisco. UCE 4599 paid MA $400 for his assistance in setting up the sale. UCE 4599 paid NIEH $500 for his assistance.

On June 27, 2012, UCE 4599 paid CHOW $2,500. UCE 4599 asked CHOW to take a brief walk with him before dinner with NIEH and Keith JACKSON. During the walk, UCE 4599 handed CHOW an envelope containing $2,500. UCE 4599 explained to CHOW there was a little extra money in the envelope because UCE 4599 worked with Ming MA selling stolen liquor to the New Asia Restaurant.

UCE 4599 told CHOW he appreciated the opportunity to work with CHOW's people. CHOW repeatedly said "no, no, no", but took the envelope out of UCE 4599's hand immediately.

On July 6, 2012, NIEH picked up UCE 4599 and drove him to meet CHANTHAVONG. In Daly City, CHANTHAVONG gave UCE 4599 approximately 4 pounds of marijuana.

On July 19, 2012, UCE talked with NIEH. NIEH said CHOW wanted to know if UCE 4599 had access to cigarette filters. UCE 4599 said he couldn't just get filters. NIEH stated he assumed that UCE 4599 did not have access to filters and that NIEH had told CHOW that UCE 4599 only had access to "finished product." NIEH also said he told CHOW that UCE 4599 "just rips off trucks." NIEH and UCE 4599 met with YUN and YUN said she had a customer in New York lined up for 50 master cases of cigarettes at $32 per carton. YUN said she might have another customer for another 50 master cases. UCE 4599 expressed concern about being robbed and YUN said she was well protected in New York and that YUN would handle all the cash. YUN warned UCE 4599 to be careful since dealing in tobacco was a more serious offense.

On August 9, 2012, UCE 4599 conducted a sale of 50 Master Cases of purportedly stolen cigarettes (in excess of 10,000 cigarettes) without any tax stamps on them with the assistance of YUN and NIEH. The cigarettes were exchanged for the money -- $96,010 in cash – with YUN and other individuals in Flushing, New York. UCE 4599 paid YUN $12,010 for her part in setting up the sale and paid NIEH $5,000 for his part.

On August 16, 2012, UCE 4599 conducted a reverse money laundering deal with YUN and NIEH for $60,000 each. YUN and NIEH were each paid $6,000 for conducting the transaction.

On August 16, 2012, UCE 4599 paid $7,000 to CHOW for allowing him to work with his people and for the cigarette deal with YUN. The UCE presented CHOW with a white envelope containing $7,000. The UCE informed CHOW he sold some cigarettes in New York with some people in CHOW's organization. The UCE thanked CHOW for the opportunity to work with his people. CHOW said "I

didn't do anything." CHOW then said "any of our friends is your friends." CHOW repeatedly said "no, no, no" while taking the envelope of cash. The UCE told CHOW on two occasions not to take the envelope of cash if he felt uncomfortable. CHOW said "you guys are doing good." CHOW took the envelope and put it in his jacket pocket. CHOW said he would pay the UCE back once CHOW's book deal was signed. The UCE told CHOW he didn't have to pay the UCE back. The UCE explained if it weren't for CHOW and his people the UCE would not have had the opportunity to conduct illegal business in San Francisco. During that night, KEITH JACKSON informed UCE 4599 that his son, later identified as BRANDON JACKSON, was shipping approximately 300 pounds of marijuana to Memphis, Tennessee per month. KEITH JACKSON advised his son was making approximately $50,000 per week. KEITH JACKSON advised his son was looking for a contact who could get large amounts of prescription medication like Oxycotin or Hydrocodone. UCE 4599 told KEITH JACKSON he may have someone who could facilitate the request.

On September 8, 2012, UCE 4599 attended a CKT dinner. UCE 4599 walked into the restaurant and observed CHOW, NIEH, YUN, MA, PAU, MEI, and SIU all working at the event by performing a variety of functions. UCE 4599 sat at a table with KEITH JACKSON and BRANDON JACKSON. UCE 4599 agreed to set up a follow up meeting with BRANDON JACKSON and KEITH JACKSON to discuss the sale and transportation of narcotics. At one point in the evening, NIEH and MA pulled UCE 4599 aside to discuss the previously arranged shipment of 15 cases of stolen liquor scheduled for September 10, 2012. NIEH and MA told UCE 4599 not to worry about off-loading the liquor in front of the restaurant. MA told UCE 4599 he would be interested in future shipments of any high end liquor UCE 4599 could procure. UCE 4599 sat down with LI and CHANTHAVONG. LI informed UCE 4599 he forgot to bring a previously discussed bullet resistant vest for UCE 4599. LI also talked about procuring a gun for UCE 4599. LI had a .357 revolver he referred to as "Big Bertha" but UCE 4599 declined the offer. LI told UCE 4599 if you run out of bullets you could use the gun as a hammer. LI

talked about getting UCE 4599 a .45 caliber gun.

On September 10, 2012, UCE 4599 sold purportedly stolen liquor to Han SO with the assistance of Ming MA and NIEH. The sale was for $8,100 for 15 cases of Johnnie Walker Blue Label Scotch. UCE 4599 had previously told MA and NIEH that the liquor had been stolen. The delivery was to Hon SO at New Asia Restaurant. During the delivery, UCE 4599 told SO to be careful with the liquor and SO told UCE 4599 that he would be careful. UCE 4599 paid MA $500 for his assistance. On September 19, 2012, UCE 4599 paid CHOW $500 for the liquor deal. The UCE gave CHOW a white envelope containing $500. The UCE paid CHOW $500 for his assistance in the sale of purportedly stolen liquor on September 08, 2012 to MING MA, a.k.a. Bak Ban and Hon SO. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 371, 2315 and 2 by MA, SO, NIEH, and CHOW.** CHOW said he "could use this." CHOW said he wanted to introduce the UCE to his narcotics connection. CHOW talked about "honest mistakes." CHOW said he doesn't allow people around him to make "honest mistakes". CHOW mentioned people that were involved in the drug trade, and said that they were not very careful. CHOW told the UCE to be very careful when dealing with people. On the ride back to the UCE's apartment, CHOW and the UCE talked about the corrupt nature of politics in San Francisco. CHOW commented how San Francisco has changed over the years. While the city itself looks clean, CHOW believed San Francisco was dirtier because of public corruption. CHOW expressed his dislike for politicians and said "If I'm into the game, I would step on them, I would nail those guys." CHOW said "all the people, they play the little dirty shit around me." CHOW further added "Oh, I'm dirty too, you know, but I'm not dirty to my people."

On September 20, 2012, UCE 4599 had dinner with KEITH JACKSON, BRANDON JACKSON, and Marlon SULLIVAN. BRANDON JACKSON and SULLIVAN described their narcotics trafficking including transporting marijuana to the East Coast and Tennessee. BRANDON JACKSON and SULLIVAN were interested in UCE 4599 assisting them by providing transportation

assistance and supplying them with cocaine and/or other "hard drugs" to sell on their established routes. UCE 4599 began telling them that was a dangerous business and that they had to be very careful and ready for it. They described that they saw UCE 4599 as a potential mentor and that when he was ready to supply them, they would get into the larger business. For the next year and a half, KEITH JACKSON, BRANDON JACKSON, and SULLIVAN solicited UCE 4599 frequently to provide cocaine for them to sell. This is the inception of the narcotics conspiracy between these three as it relates to trafficking narcotics with UCE 4599. **I believe this and subsequent conduct demonstrates probable cause for a violation of Title 21, United States Code, Section 846 by Keith JACKSON, Brandon JACKSON, and SULLIVAN.**

On September 26, 2012, CHANTHAVONG, LI, and NIEH facilitated the sale of a firearm to UCE 4599 for $600. The firearm was a Rossi .22 caliber, serial number 69874. CHANTHAVONG gave the firearm to UCE 4599 in his vehicle. LI told UCE 4599 that he had given the gun to CHANTHAVONG to sell to UCE 4599. All three, CHANTHAVONG, LI, and NIEH, were convicted felons at the time of the sale. According to contacts with the Bureau of Alcohol, Tobacco, Firearms and Explosives (hereafter "ATF"), and their records checks, none were licensed firearms dealers. The .22 caliber firearm had "Made in Brazil" stamped on it. Research of information available on open source websites shows that the weapon was not manufactured in California. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 922(a)(1), 922(g) and 2 by CHANTHAVONG, LI, and NIEH.**

On October 2, 2012, CHANTHAVONG and NIEH sold a firearm to UCE 4599 for $1,000. The firearm was a Daewoo DR-200 .223 caliber rifle, serial number RA001216. Both CHANTHAVONG and NIEH were convicted felons at the time of the sale. According to ATF records checks, neither was a licensed firearms dealer. I have conducted research and determined that the Daewoo rifle was

manufactured by Kimber in Oregon. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 922(a)(1), 922(g) and 2 by CHANTHAVONG, and NIEH.**

On October 11, 2012, UCE 4599 conducted reverse money laundering deals with NIEH and YUN, each for $60,000. UCE 4599 paid $6,000 each for conducting the transactions.

On October 18, 2012, UCE 4599 paid $2,000 to CHOW. UCE 4599 told CHOW that UCE 4599 was doing good business with NIEH. CHOW took the money and said thank you.

On October 24, 2012, Oakland Police Department and FBI executed searches pursuant to state search warrant at CHANTHAVONG's residence in Daly City. Inside, they found a grow with 91 marijuana plants, scales, a pressed brick of approximately 1.78 kilos of cocaine, a Taurus semi-automatic pistol, .45 caliber, Model PT 145, and 18 rounds of ammunition. CHANTHAVONG was present in the home. They also found keys to a warehouse and, pursuant to search warrant, searched a warehouse at 2715 Magnolia Street in Oakland. There they found 496 marijuana plants, grow lights, other growing equipment, a red hydraulic press to press kilograms of powder narcotics with trace amounts of cocaine on it, a digital scale with trace amounts of cocaine on it, and other items. The drugs were tested by DEA Laboratory. **I believe this demonstrates probable cause for a violation of Title 21, United States Code, Sections 841(a)(1)(B) and a violation of Title 18, United States Code, 924(c) by CHANTHAVONG.**

On October 30, 2012, Antioch Police Department and FBI Agents conducted a search at a warehouse in Antioch, California. Law enforcement found a grow throughout the warehouse with 803 marijuana plants, currency, indicia, and a map with the area of Michael MEI's house circled. Inside the grow, working, were Michael MEI's parents. The parents were arrested and then released. The plants tested positive as marijuana. On November 14, 2012, NIEH talked to UCE 4599 about the search and said that MEI's parents were arrested, but that the grow was actually MEI's grow. On December 12, 2012, NIEH told UCE 4599 that MEI was YUN's supplier for marijuana. On March 29, 2013, UCE

4599 talked to MEI. UCE 4599 told MEI that he had heard about the search on MEI's grow and MEI responded "it was hectic, it was crazy, it was crazy. Everything is good." **I believe this demonstrates probable cause for a violation of Title 21, United States Code, Sections 841(a)(1)(B) by MEI.**

On November 19, 2012, UCE 4599 met with KEITH JACKSON and discussed Senator YEE. During the meeting, UCE 4599 and KEITH JACKSON discussed getting UCE 4599 back together with BRANDON JACKSON to discuss narcotics trafficking and money laundering.

On December 12, 2012, UCE 4599 conducted a reverse money laundering deal with NIEH for $70,000 and paid NIEH $7,000 for conducting the transaction. On the same date, UCE 4599 paid CHOW $2,000. UCE 4599 handed CHOW a white envelope containing $2,000. UCE 4599 told CHOW he had a very successful year working with members of CHOW's organization. Specifically, UCE 4599 thanked CHOW for the opportunity to work with NIEH and YUN. CHOW said "you are doing good." UCE 4599 told CHOW "we are all doing good." UCE 4599 expressed his gratitude to CHOW for introducing UCE 4599 to good friends and trusted brothers. UCE 4599 told CHOW he had an upcoming meeting with SENATOR LELAND YEE to discuss having CHOW's ankle monitoring device removed. UCE 4599 told CHOW he introduced an individual through KEITH JACKSON who helped Senator YEE a great deal. UCE 4599 told CHOW that SENATOR YEE owes UCE 4599 and his family. UCE 4599 talked to CHOW about growing new illegal business opportunities over the following year. They discussed CHANTHAVONG being arrested for drugs and UCE 4599 wanting to launder money for TINA LIANG.

On January 10, 2013, UCE 4599 sold purportedly stolen cigarettes without tax stamps, with the assistance of James PAU and Leslie YUN. UCE 4599 met YUN and PAU in Flushing, New York. The cigarettes (in excess of 10,000 cigarettes) were sold for $192,000. YUN and PAU received $24,000 for setting up the deal.

On January 16, 2013, UCE 4599 paid both NIEH and CHOW $7,000 for facilitating the cigarette deal in New York. UCE 4599 told NIEH and CHOW he was with JAMES PAU and LESLIE YUN the previous week. UCE 4599 sold purportedly stolen cigarettes to YUN and PAU's associates. UCE 4599 presented CHOW with two white envelopes each containing $7,000. UCE 4599 asked CHOW to pick an envelope. CHOW picked an envelope and said "that look like bigger one." NIEH took and envelope and said "thanks [UCE 4599]." UCE 4599 told CHOW and NIEH he was very impressed on how well PAU managed the stolen cigarette transaction. NIEH replied "PAU is no joke, man." UCE 4599 told CHOW he wouldn't have the opportunity to do business without CHOW's permission. CHOW said he didn't know PAU and YUN were in New York. UCE 4599 told CHOW it was better to keep CHOW out of the transaction because he was the Dai Lo. CHOW said "you guys are doing bad things." The UCE told CHOW that's how they make a living. CHOW jokingly replied "I'm rehabilitated. You are very, very bad." UCE 4599 told CHOW and NIEH he was surrounded by good people and trusted brothers. NIEH replied "Good people doing bad things." UCE 4599 told CHOW he would be meeting with Senator Leland YEE in the near future. The UCE told CHOW he would speak to YEE about having CHOW's ankle monitor removed. CHOW thought YEE would be scared to talk the UCE because of the UCE's criminal background. UCE 4599 explained YEE would have to earn the UCE's friendship by doing favors for UCE 4599. UCE 4599 told CHOW he was a loyal brother to CHOW and a good earner for CHOW's organization. UCE 4599 told CHOW he had a vested interest in having CHOW's ankle monitor removed because CHOW would have the ability to introduce UCE 4599 to more people. UCE 4599 told CHOW he had made UCE 4599 a lot of money because of CHOW's introductions to the right people. CHOW thought SENATOR YEE could not be trusted. UCE 4599 agreed with CHOW. UCE 4599 told CHOW and NIEH he was very impressed with the way PAU managed the stolen cigarette transaction. The last time UCE 4599 sold stolen cigarettes to YUN's associates in New York it took over six hours. The cigarette deal on January 10, 2013, took slightly

over one hour. UCE 4599 told CHOW he trusted PAU so much, he didn't even bother counting the money owed for the stolen cigarettes. UCE 4599 explained details of the stolen cigarette transaction to CHOW and NIEH. Shortly after, NIEH asked UCE 4599 if he was able to obtain stolen liquor. UCE 4599 told NIEH he would check with his associates in New Jersey. UCE 4599 said he believed there wasn't a lot of profit margin in the sale of the stolen liquor but would do it as a favor to CHOW and NIEH's associates. UCE 4599 told CHOW and NIEH he was supposed to meet with Al NHINGSAVATH on his most recent trip to New York City. NHINGSAVATH wanted UCE 4599 to exchange smaller denominations of U.S. currency for one-hundred dollar bills. UCE 4599 advised he was unsuccessful meeting with NHINGSAVATH while he was in New York. After lunch, CHOW, NIEH and UCE 4599 stood outside of the restaurant. CHOW talked about the CKT being a "secret society." CHOW wanted to focus on bringing attention to the positive things the CKT was doing in the community. UCE 4599 agreed with CHOW but told him there is also the other side of the CKT that had to "take care of business," referring to criminal activity. CHOW told UCE 4599 s/he, UCE 4599, was the "bad part" of the CKT. NIEH and CHOW drove UCE 4599 back to his apartment. During the ride, NIEH asked what type of stolen liquor UCE 4599 had available. NIEH also asked the UCE when the next round of "coffee" would be. The term coffee is code for money laundering. UCE 4599 told NIEH within a few weeks. CHOW advised UCE 4599 to slow down. UCE 4599 talked about being careful when choosing the right criminal activity to get involved with. UCE 4599 told CHOW he wanted to be safe and utilize the resources around him. CHOW told UCE 4599 he tries not to think about criminal activity but when he does, it's "nothing but trouble." UCE 4599 told CHOW he, CHOW, surrounds himself with good people. UCE 4599 hoped CHOW thought of him as a trusted brother. CHOW told UCE 4599 he was family and was a "good brother."

On January 23, 2013, UCE 4599 purchased a firearm from CHANTHAVONG and LI for $1,000. The firearm was a Ruger SR40, serial number 342-084-83, with two magazines and 28 rounds

of ammunition. According to Ruger, it manufactures firearms in New Hampshire and in Arizona and does not manufacture firearms in California. LI offered to get whatever weapons UCE 4599 wanted and asked UCE 4599 to put together a list. LI offered that he and CHANTHAVONG would do "collections" for UCE 4599, meaning that they would collect unlawful debts for UCE 4599, through a "good guy, bad guy" routine. LI said that when he scratched his head, that would be the signal for CHANTHAVONG to slap the guy in the face. UCE 4599 said he would consider it. They discussed one of LI's associates in his marijuana business who was arrested in Pennsylvania with 50 pounds of marijuana and asked UCE 4599 about his marijuana prices. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 922(a)(1), 922(g) and 2 by CHANTHAVONG and LI.**

On February 5, 2013, UCE 4599 met with Tina LIANG. Tina LIANG asked if UCE 4599 was still charging five percent to launder money. UCE 4599 told Tina LIANG that he charged 4% to launder quantities under $100,000 and 3% for quantities in excess of $100,000. Tina LIANG stated that her associate was recently pulled over in a traffic stop and lost approximately $170,000. Tina LIANG said another associate lost about the same amount. UCE 4599 told Tina LIANG that it was very risky to transport money from New York to San Francisco. Tina LIANG said she believed that members of CHOW's organization were transporting marijuana and selling it to people in Flushing, New York. Tina LIANG asked about any more access to stolen liquor. UCE 4599 told Tina LIANG that the profit margin wasn't big enough in stolen liquor. UCE 4599 told Tina LIANG that he preferred to sell stolen cigarettes. Tina LIANG said people recently got arrested for that in New York City and asked what brand of cigarettes UCE 4599 could get. Tina LIANG asked if UCE 4599 could assist in recovering the $170,000 that was taken by law enforcement. Tina LIANG stated she was paying approximately $1,800 for a pound of marijuana. Tina LIANG told UCE 4599 that her associates were looking to launder approximately $500,000 per week from New York to San Francisco. Tina LIANG said that she met someone in CHOW's organization named "Kevin" and that she trusted CHOW, but didn't trust "Kevin."

Tina LIANG said "Kevin" tried to sell Tina LIANG purportedly "Sour Diesel" grade marijuana. Tina LIANG said she found out that the purported "Sour Diesel" was actually marijuana of lesser quality.

On February 14, 2013, UCE 4599 conducted a reverse money laundering deal with NIEH for $80,000 and paid NIEH $8,000 for conducting the transaction. On the same date, UCE 4599 paid CHOW $2,000. UCE 4599 gave CHOW an envelope containing $2,000. UCE 4599 told CHOW s/he would be doing some illegal business with NIEH later in the day. The UCE thanked CHOW for the opportunity to work with his people. CHOW laughed and said "No, no, I didn't give you the opportunity; you make your own opportunity. Damn, that is bribery money dude, that's not good." CHOW thanked UCE 4599 and told the UCE he was a good friend and a trusted brother. NIEH drove CHOW to the Chinatown section of San Francisco. The UCE and CHOW joked about the UCE's relationship with NIEH. The UCE asked what CHOW thought NIEH and the UCE did at the UCE's apartment. CHOW responded "That's terrible dude, I don't want to know, that's illegal stuff, I don't want to know."

On March 29, 2013, UCE 4599 attended the CKT annual event. There, a member of SENATOR YEE's staff presented a proclamation from the California State Senate, provided by SENATOR YEE, for the CKT. UCE 4599 discussed conducting money laundering transactions for CHANTHAVONG, LI, and Albert NHINGSAVATH. CHANTHAVONG and Michael MEI described recent law enforcement busts of their marijuana grow operations. CHANTHAVONG said he was transporting 100 pounds of marijuana to the East Coast per week and that he needed help laundering the funds. LI also discussed committing violence against others for the benefit of the CKT and for his own personal enjoyment. It was described to UCE 4599 that CHANTHAVONG and NHINGSAVATH reported to LI. LI, CHANTHAVONG and NHINGSAVATH asked about UCE 4599 laundering their drug money from the East Coast. UCE 4599 told them he would charge 4% for anything smaller than $100,000 and 3% for anything more than $100,000.

On April 11, 2013, UCE 4599 conducted reverse money laundering deals with NIEH and YUN. The deal with NIEH was for $70,000 and UCE 4599 paid NIEH $7,000 for conducting the transaction. The deal with YUN was for $30,000 and UCE 4599 paid YUN $3,000 for conducting the transaction.

On April 16, 2013, UCE 4599 engaged with LI and Albert NHINGSAVATH to launder their money, traditional money laundering, by having an associate (another UCE) pick up cash in New Jersey, launder it through UCE 4599's "legitimate" business, and deliver cash in San Francisco to NHINGSAVATH. When I use the phrase "traditional" money laundering, I am referring to the UCE laundering actual proceeds of specified unlawful activity from the targets, which violates 18 U.S.C. Section 1956(a)(1), as contrasted with "reverse" money laundering where the targets agree to launder funds that the UCE has represented to be proceeds of specified unlawful activity, which violates 18 U.S.C. Section 1956(a)(3). The money came from LI and NHINGSAVATH's illegal narcotics business, trafficking from the West Coast to the East Coast. UCE 4599's associate picked up $50,000 in cash from an associate of LI and NHINGSAVATH later identified as Norge MASTRANGELO in New Jersey. The money was then laundered through UCE 4599's "accounts" and delivered – minus a 4% laundering fee – by UCE 4599 to NHINGSAVATH in San Francisco. These transactions promoted the illegal business as well as concealing the true nature and source of the funds. On April 17, 2013, UCE 4599 paid $2,500 to CHOW. UCE 4599 gave CHOW an envelope containing $2,500. UCE 4599 thanked CHOW for the opportunity to do business with NIEH, YUN, LI, and NHINGSAVATH. CHOW told UCE 4599 "Thank you." UCE 4599 told CHOW the envelope was open and to be careful not to drop it. CHOW replied, "I drop it in my pocket" then laughed. UCE 4599 thanked CHOW for smoothing over the relationship between Andy LI and Albert NHINGSAVATH. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1956(a)(1)(A) and (B) and 2 by LI, NHINGSAVATH, MASTRANGELO, and CHOW.** CHOW later told UCE 4599 how to share emails as "drafts" with other people so that law enforcement can't find them as "sent"

emails. CHOW asked UCE 4599 about his recent activity. UCE 4599 told CHOW his illegal gambling business was starting to slow down but was encouraged by the new opportunity to launder drug proceeds with Andy LI and Albert NHINGSAVATH. UCE 4599 told CHOW in the past, LI and NHINGSAVATH were having people transport large amounts of cash by strapping it to their bodies to avoid detection by airport security. CHOW told UCE 4599 back in the old days that was an acceptable way to transport cash but not by today's standards. UCE 4599 told CHOW he offered an expedited safe service in laundering their drug proceeds. UCE 4599 told CHOW that LI and NHINGSAVATH were laundering small amounts of cash. UCE 4599 told CHOW he would give CHOW a big portion of UCE 4599's profit from the laundered money. UCE 4599 was hoping LI and NHINGSAVATH would start to launder larger sums of money with UCE 4599. CHOW told UCE 4599 he should let LI and NHINGSAVATH know UCE 4599's expectations. CHOW explained there are lots of smaller criminal crews in the San Francisco Bay Area. Each crew has their own leader. CHOW was not the leader of the smaller crews but when CHOW "calls them out" they all come out to support CHOW. CHOW said "If anyone fucks with me, they are done for." If one day CHOW needed the criminal crews he expected they would be there for him. CHOW told UCE 4599 if UCE 4599 had any problems with any of CHOW's associates UCE 4599 should let CHOW know. UCE 4599 asked ANDY LI if he was happy with the money laundering services provided by UCE 4599. LI and NHINGSAVATH were happy with UCE 4599's services. LI thought it was more about "getting your toes wet" and creating a trusting relationship with UCE 4599. If something happened to the money entrusted to UCE 4599, LI told UCE 4599 he would "come after your ass."

On April 29, 2013, UCE 4599 conducted a money laundering transaction with LI, NHINGSAVATH, and MASTRANGELO. The money, $80,314, had been picked up from NHINGSAVATH and MASTRANGELO in New Jersey on April 25, 2013. UCE 4599 returned $77,100 to NHINGSAVATH and MASTRANGELO in San Francisco.

On May 6, 2013, UCE 4599 purchased a Smith and Wesson, Model M&P 15-22, and eight rounds of .22 LR ammunition from KEITH JACKSON and BRANDON JACKSON. They discussed a cocaine deal. UCE 4599 also provided a $5,000 check for "Leland Yee for Secretary of State" in exchange for the proclamation to the CKT.

On May 14, 2013, UCE 4599 completed a money laundering transaction with Albert NHINGSAVATH, MASTRANGELO, and LI. MASTRANGELO had delivered $99,275 in New Jersey and UCE 4599 provided $96,275 to NHINGSAVATH in San Francisco.

On May 15, 2013, UCE 4599 paid $1,000 to CHOW. UCE 4599 thanked CHOW for fostering the relationship between LI, NHINGSAVATH, and UCE 4599. CHOW asked how LI and NHINGSAVATH were doing. UCE 4599 stated that they were doing well and he was laundering a lot of their money. UCE 4599 told CHOW he thought he would launder over one million dollars of drug proceeds with LI and NHINGSAVATH during the next 6 or 7 months. UCE 4599 also said he was unable to come to an agreement with YUN on the sale of cigarettes. NIEH was present during these conversations.

On June 14, 2013, NIEH drove UCE 4599 to meet with YUN. During the drive, NIEH told UCE 4599 that Xiu Ling LIANG, a/k/a Elaine LIANG, wanted UCE 4599 to launder money from Boston to San Francisco. NIEH called Elaine LIANG from his car phone. LIANG asked how much UCE 4599 charged and NIEH said 10% for money laundering, 4% for exchanging money. Elaine LIANG said she usually does it twice a week for $200,000 each time. CHOW called and NIEH described them trying to meet with Elaine LIANG. Later that day, UCE 4599 conducted a reverse money laundering deal with NIEH for $77,000 and paid NIEH $7,000.

On June 19, 2013, UCE 4599 paid CHOW $2,000 and told CHOW that he and NIEH had conducted business last week. CHOW told UCE 4599 he wouldn't say much other than "thank you." CHOW commented that UCE 4599 does nothing but conduct illegal business all day. They discussed

CHOW protecting associates with his security. They also discussed UCE 4599 doing business with Elaine LIANG. UCE 4599 told CHOW he was going to New York to conduct another cigarette deal with YUN and PAU. Later, CHOW asked what type of business UCE 4599 wanted to conduct with Elaine LIANG. UCE 4599 said money laundering, the same as with LI and NHINGSAVATH. CHOW said he would look into it for UCE 4599.

On June 24, 2013, UCE 4599 conducted a purchase of firearms from BRANDON JACKSON, KEITH JACKSON, and Marlon SULLIVAN. UCE 4599 paid $3,400 and received 3 firearms. They discussed UCE 4599 setting them up with a source of cocaine for their narcotics trafficking business.

On June 25, 2013, UCE 4599 conducted a purchase of firearms from BRANDON JACKSON, KEITH JACKSON, and SULLIVAN. UCE 4599 paid KEITH JACKSON $5,300 and SULLIVAN $1,400. According to ATF records checks, none of the three are licensed to deal in firearms. KEITH JACKSON told UCE 4599 that he was hoping that UCE 4599 could raise more money for SENATOR YEE. They provided UCE 4599 with one .22 caliber Ruger Model 10/22 carbine; one Cobray machinegun pistol; one Mossberg Maverick pump-type shotgun and 12 gauge rounds; one Smith and Wesson, Model 59 handgun; one Colt model MK IV series 80 handgun; one 7.62mm Clayco Sports AKS rifle; 38 rounds of ammunition; and two ballistic vests (including one that was stolen from FBI). They also discussed prices of kilograms of cocaine that they were soliciting UCE 4599 to allow them to purchase for trafficking. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 922(a)(1) and 2 by Keith JACKSON, Brandon JACKSON, and SULLIVAN.**

On July 12, 2013, UCE finished a traditional money laundering transaction involving LI, NHINGSAVATH, and MASTRANGELO. MASTRANGELO had delivered $92,860 in New Jersey, and UCE 4599 gave MASTRANGELO $89,160 in San Francisco. NHINGSAVATH asked if it would be okay to introduce another member of his organization to drop off money, named "Brian."

On July 18, 2013, UCE 4599 conducted a deal of purportedly stolen and contraband cigarettes arranged by YUN and PAU. UCE 4599 met with YUN and PAU in Flushing, New York. The deal was for 100 master cases which is 120,000 cigarettes (far more than the 10,000 required to trigger the contraband cigarette statute). YUN agreed to pay $168,000 for the 100 master cases. PAU and YUN met the UCEs in New York and went to confirm the merchandise. UCE 4599 wanted to know how PAU wanted his cut. PAU said to talk to YUN since she was responsible for finances. PAU said "I just do the work, and George [NIEH] takes care of the Old Man [CHOW]." PAU reiterated that his position in the CKT was "415," the "white paper fan." PAU said that YUN was the bookkeeper for the Tong. PAU described that NIEH and CHANTHAVONG were responsible to protect CHOW. LI was "426" within the Tong, which made him a fighter, and made the shape of a gun with his hand. PAU said that he, PAU, would be responsible for making the call on a hit and LI would be responsible for carrying it out. PAU said that CHOW encouraged them to grow their illegal business by working with cultures outside of the Chinese community. PAU said that LI works directly with CHOW. PAU discussed the occasional need to kill people by the CKT. The cigarettes were sold for $167,900. The money delivered was short $17,900, but later paid by NIEH to UCE 4599.

On July 22, 2013, UCE 4599 conducted a traditional money laundering deal with LI, NHINGSAVATH, and MASTRANGELO. MASTRANGELO had delivered $45,000 on July 19, 2013 in New Jersey and UCE 4599 delivered $43,200 to NHINGSAVATH in San Francisco.

On July 23, 2013, UCE 4599 collected $17,900 from NIEH that was still owed on the cigarette deal. UCE 4599 said he was surprised YUN shorted him. CHOW said "you guys are bad people." UCE 4599 counted $5,000 from the cash and gave it to CHOW and thanked him. UCE 4599 said they would not have the opportunity to make money without CHOW's permission. UCE 4599 told CHOW that the cigarette deal with PAU and YUN was successful. CHOW thanked UCE 4599 and said "I never did anything." NIEH laughed and said "well, I did." UCE 4599 also gave $5,000 to NIEH. UCE 4599

reminded CHOW that CHOW had previously said that "I am successful when my brothers are successful." UCE 4599 reiterated that the cigarette deal went well and that PAU managed the transaction in New York. CHOW agreed that it was important to handle illegal business in a different location well. UCE 4599 said that he had faith in PAU and YUN. CHOW said "you're lucky you know people." **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 371, 2315, 2342, 2344, and 2 by PAU, YUN, NIEH, and CHOW.** UCE 4599 and CHOW discussed Elaine LIANG following up to get money laundered by UCE 4599. UCE 4599 said he wasn't worried about getting shorted on the money for the cigarette deal because YUN's associates knew that UCE 4599 was affiliated with CHOW. CHOW smiled and said "are you sure?" They talked about a heroin deal proposed by LI to UCE 4599. CHOW asked UCE 4599 if he'd ever dealt in heroin before and UCE 4599 said his associates in New Jersey have. CHOW said it was a very tempting proposition. UCE 4599 asked for CHOW to vouch for him with the 14K Triad. CHOW said he would when he met them. CHOW boasted about all the different criminal enterprises that he knew, including motorcycle gangs. CHOW said "China White" [high grade heroin] is a scandalous market and it is hard to succeed. CHOW said he had been approached, but declined and described how to deal in heroin. CHOW told UCE 4599 not to deal in heroin. UCE 4599 said he would not, but just make the right introductions between other people, like CHOW does for UCE 4599.

On August 2, 2013, UCE 4599 met with BRANDON JACKSON and KEITH JACKSON to discuss purchasing firearms. They discussed that BRANDON's source was "Rinn," later identified as Rinn ROEUN. KEITH JACKSON stated that SENATOR YEE was also associated with a person who was an international arms dealer who was shipping large stockpiles of weapons into a foreign country. KEITH JACKSON described that SENATOR YEE met the arms dealer a long time ago and had been working with him to ship weapons to a foreign country.

On August 5, 2013, UCE 4599 met KEITH JACKSON and BRANDON JACKSON to purchase

weapons. UCE 4599 paid them $2,000 to purchase several weapons – Norinco 7.62mm x 39mm SKS rifle with a magazine; Norinco 7.62mm x 39mm rifle with a high capacity drum magazine; one semi-automatic 9mm Uzi pistol, Model 8 with a magazine; two additional magazines; 78 rounds of 7.62mm x 39mm ammunition. During the meeting, KEITH JACKSON said that he talked to SENATOR YEE about introducing UCE 4599 to the arms dealer they had previously discussed. According to KEITH JACKSON, SENATOR YEE requested that UCE 4599 raise additional campaign contributions for SENATOR YEE's campaign for California Secretary of State. UCE 4599 said he would make a contribution for an initial meeting and that, if it was successful, UCE 4599 would provide SENATOR YEE with a lot more money. KEITH JACKSON stated that SENATOR YEE also has friends who are trying to move weapons into a foreign country. KEITH JACKSON said he would try to meet with the arms dealer over the next couple days.

On August 8, 2013, UCE 4599 met with KEITH JACKSON and BRANDON JACKSON to purchase four weapons for $6,900. The weapons were one AR-15 type rifle with no serial number or manufacturer stamp; one black Intratec 9mm Luger Mod. Tec 9 assault pistol; one Springfield Armory, Model 1911-A1 .45 caliber pistol; one Bushmaster Carbon-15, .223 caliber rifle; 16 rounds of .223 ammunition and miscellaneous gun parts.

On August 9, 2013, in Atlanta, Georgia, Serge GEE dropped off $93,780 to a UCE for laundering. On August 11, 2013, UCE 4599 completed the money laundering transaction involving GEE, Xiu Ling LIANG, and NIEH. NIEH told UCE 4599 that he had discussed the transaction with CHOW and that CHOW had said that UCE 4599 should have charged for airline tickets. NIEH and UCE 4599 met with Elaine LIANG and GEE. UCE 4599 asked what type of marijuana GEE was selling and GEE said it was indoor grows for $3,800 per pound. GEE said he was nervous about flying with a lot of cash. GEE said he sends several hundred pounds of marijuana per week to the east coast. UCE 4599 provided GEE with $90,180. GEE offered to sell Molly (powder MDMA) to UCE 4599 for

$18,000 per unit. GEE described having regular drivers and that he also sold kilos of cocaine for $38,000. GEE said he trafficked about 200-300 pounds of marijuana per week in Atlanta. UCE 4599 provided NIEH with $1,000 for his assistance. NIEH told UCE 4599 "you got to thank the Old Man [CHOW] that he went to put his name out there." NIEH told UCE 4599 that he, NIEH, told CHOW about every criminal business opportunity that UCE 4599 has conducted. NIEH said CHOW wanted to know about it.

Later on August 11, 2013, UCE 4599 arranged a meeting with KEITH JACKSON, BRANDON JACKSON, and SULLIVAN to discuss firearms purchases and cocaine trafficking.

On August 16, 2013, Norge MASTRANGELO and another individual dropped off $199,900 to a UCE in New Jersey to be laundered. On August 19, 2013, UCE 4599 delivered $194,000 to NHINGSAVATH in San Francisco.

On August 26, 2013, UCE 4599 met with KEITH JACKSON, BRANDON JACKSON and SULLIVAN to purchase a firearm for $600. The firearm was a Luger 9mm Model Tec 9 assault pistol with an extended magazine and 50 rounds of Remington 9mm Luger ammunition.

On August 27, 2013, UCE 4599 completed a traditional money laundering deal with GEE, and Elaine LIANG. On August 26, 2013, GEE delivered $155,900 to a UCE in Atlanta. On August 27, 2013, UCE 4599 delivered a box of cash to GEE and ELAINE LIANG, with approximately 4% retained.

On August 27, 2013, UCE 4599 met with BRANDON JACKSON and Rinn ROEUN to discuss purchasing additional firearms. UCE 4599 told ROEUN he was arming his marijuana grows in Mendocino County. ROEUN also offered mines, hand grenades and C4. ROEUN discussed firearms for sale and also offered to perform protection services for UCE 4599. ROEUN also offered services to UCE 4599 "if you want somebody gone." UCE 4599 asked how much ROEUN charged for killing someone. ROEUN said $10,000. UCE 4599 told ROEUN he had someone in mind and would pay

$25,000 for it. ROEUN said he would keep that extra $15,000 then. UCE 4599 began describing the fictitious person who he wanted killed. ROEUN left the table to go to the bathroom. UCE 4599 asked if ROEUN was the person that BRANDON JACKSON was referring to when he told UCE 4599 that he, BRANDON JACKSON, had the capabilities to kill someone if needed. BRANDON JACKSON replied, "he could do it, or I could do it too." After returning to the table, ROEUN acknowledged that he had provided the last batch of guns for UCE 4599. ROEUN said he just needed the "specs" for the murder for hire, "is there an alarm, how many people are in the house?" ROEUN also confirmed he had provided the ballistic vests that UCE 4599 bought. ROEUN said they were straight from SFPD, but BRANDON JACKSON corrected him that they were from FBI and ROEUN said "oh yeah, yeah."

On August 28, 2013, UCE 4599 was in Las Vegas, Nevada and called ROEUN from his cellular telephone, after missing a call from ROEUN's cellular telephone earlier. ROEUN said, in connection with the murder for hire, he had spoken to "the guy" and asked UCE 4599 to provide a photograph and address of the victim. ROEUN said his guy needed two to three weeks to do his "homework" on the victim and then the "job will get done." ROEUN said he would pick up the picture and address of the intended victim from UCE 4599. UCE 4599 told ROEUN he wanted to give the victim another chance to redeem himself but if it did not work out, then UCE 4599 would hire ROEUN. ROEUN said "okay, I mean, I got you." **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Section 1958 by ROEUN.**

On August 30, 2013, an associate of NHINGSAVATH dropped off $114,860 with a UCE in New Jersey. On September 3, 2013, UCE 4599 completed a traditional money laundering deal with MASTRANGELO, LI, and NHINGSAVATH. On September 3, 2013, UCE 4599 arranged with NHINGSAVATH to drop off $111,415 in a brown paper bag with an individual known to be associated with NHINGSAVATH. After the transaction, UCE 4599 confirmed the drop off with NHINGSAVATH via a telephone call between UCE 4599 and NHINGSAVATH.

On September 3, 2013, GEE had arranged with a UCE in Atlanta, Georgia, to pick up $76,030 in cash from two unknown individuals. GEE directed the UCE to the two individuals via phone calls and text messages. The two individuals were a white male and white female who let the UCE talk to GEE on the phone while handing the UCE a bag with cash in it, and GEE stated that it was "76" in the bag. On September 6, 2013, UCE 3322 completed a traditional money laundering deal with GEE and Elaine LIANG. On September 6, 2013, UCE 3322 delivered $73,000 to GEE. GEE then left with an individual later identified as Gary CHEN.

On September 9, 2013, in Atlanta, Georgia, GEE arranged for an unknown person to deliver $203,000 in shrink-wrapped packages to a UCE. On September 10, 2013, UCE 4599 completed a traditional money laundering deal involving NIEH, GEE and Elaine LIANG in Millbrae, California. On September 10, 2013, UCE 4599 delivered a FedEx box with $195,000 to GEE and Elaine LIANG. GEE took out some of the money and gave it to LIANG and said "pay the rent." GEE discussed paying UCE 4599 monthly to launder $3,000,000 per month. GEE said he was distributing approximately 800 pounds of marijuana per month. UCE 4599 paid NIEH $1,000 for his assistance. NIEH described that CHOW had a fight with LI and had a falling out with LI and CHANTHAVONG. NIEH said CHOW had ordered NIEH to "pop" LI the next time he saw him, but NIEH was hoping they would work out their problems in a civil way. On September 12, 2013, UCE 4599 met with NIEH and CHOW. CHOW told UCE 4599 that he was a "hustler." UCE 4599 gave CHOW an envelope with $3,000 and apologized for not getting it to CHOW sooner. CHOW thanked UCE 4599 and told him not to worry about the delay. UCE 4599 told CHOW he was making a lot of money working with Elaine LIANG and would not have had that opportunity if CHOW had not talked to Elaine LIANG on UCE 4599's behalf. CHOW laughed and told UCE 4599 to stop "doing illegal stuff." UCE 4599 told CHOW that LIANG and her son, GEE, were transporting large amounts of drugs to the east coast and making a lot of money. CHOW warned UCE 4599 to be careful. UCE 4599 asked if CHOW knew GEE and CHOW said "of

course." CHOW said not to trust anyone. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1956(a)(1)(A) and (B) and 2 by Elaine LIANG, GEE, NIEH, and CHOW.**

On September 13, 2013, UCE 4599 met with LI and NHINGSAVATH in San Francisco to conclude a traditional money laundering deal. On September 11, 2013, MASTRANGELO and an associate had delivered $262,435 to a UCE in New Jersey. On September 13, 2013, UCE 4599 delivered $200,000 to NHINGSAVATH in a FedEx box. UCE 4599 told LI he was looking to purchase 3-5 pounds of indoor marijuana. LI said it would cost $2,600 per pound. LI described that he fought CHOW because CHOW never owned up to ordering the 1991 arson committed by LI where LI was severely burned. LI said it was a "chain of command" issue. LI wanted to "smash" people who spread rumors about his fight with CHOW. UCE 4599 told LI that his people in New Jersey were not as reliable as they should be. LI said he would fix that. On September 17, 2013, UCE 4599 met with NHINGSAVATH and delivered the remaining $55,125.

On September 13, 2013, UCE 4599 met with KEITH JACKSON and said he was skeptical of SENATOR YEE's ability or desire to introduce him to the arms dealer. KEITH JACKSON said it was a real opportunity and that it was SENATOR YEE who approached JACKSON with the opportunity. JACKSON said that the trafficker was "the real deal" but wanted to move at a slower pace.

On September 13, 2013, UCE 4599 met with ROEUN to purchase firearms. ROEUN delivered a TAPCO AK-47 assault rifle with a scope and flashlight and a magazine for $2,000. UCE 4599 told ROEUN that he had decided to follow through with the murder for hire after the holidays and would pay $25,000. UCE 4599 said he would provide a photo and an address and ROEUN said "the job will get done."

On September 18, 2013, UCE 4599 completed a traditional money laundering deal with GEE and ELAINE LIANG. On September 16, 2013, a UCE had picked up $107,400 in shrink-wrapped

packages from an associate of GEE. The associate stated that he would likely be the person making future cash transactions. On September 18, 2013, UCE 4599 rode with NIEH to meet GEE and ELAINE LIANG to deliver the cash minus 4% transaction fee. After the meeting, GEE and ELAINE LIANG left and GEE kept the FedEx box and got into a car registered to Anthony LAI.

On September 18, 2013, UCE 4599 met with LI and CHANTHAVONG in San Francisco. LI delivered a brown cardboard box and said it had five pounds of "Sour Diesel" [marijuana]. UCE 4599 paid LI $13,000. They walked to talk to CHANTHAVONG. CHANTHAVONG said that law enforcement was trying to eradicate large scale outdoor grows. A presumptive test showed positive for marijuana. **I believe this demonstrates probable cause for a violation of Title 21, United States Code, Section 846 by CHANTHAVONG and LI.**

On September 20, 2013, UCE 4599 met with ROEUN in San Francisco. ROEUN provided UCE 4599 with a Calico, Model M-951, 9mm pistol with a threaded barrel fitted with a silencer. ROEUN stated that the silencer was homemade but that it was operational.

On September 26, 2013, UCE 4599 completed a traditional money laundering deal started earlier that day in Atlanta. GEE met with a UCE in Atlanta and delivered $150,000 to that UCE in a white plastic garbage back inside of a brown leather bag. On the same date, UCE 4599 and NIEH met with Elaine LIANG at a restaurant in Millbrae, California. UCE 4599 provided Elaine LIANG with a FedEx box containing $139,200.

On October 1, 2013, UCE 4599 completed a traditional money laundering deal with GEE. Earlier that day, CHEN had delivered $189,780 in cash to a UCE in New Jersey. Later, NIEH picked up UCE 4599 and UCE 4599 delivered $182,110 to GEE in Millbrae. GEE's driver was identified as Anthony LAI.

On October 2, 2013, UCE 4599 arranged to meet CHOW and NIEH to provide a payment to CHOW for recent money laundering transactions with Elaine LIANG and GEE. UCE 4599 was picked

up by NIEH and CHOW and driven to Yank Sing Restaurant. The UCE gave CHOW an envelope which contained $1,500. UCE 4599 told CHOW the business with Elaine LIANG and GEE was going well. UCE 4599 surmised LIANG was the "Dragon Lady"(Boss). CHOW replied "She is." The UCE told CHOW that GEE was sending 800 pounds of marijuana per month to the east coast. CHOW thought there were a lot of confidential informants (CI) who were reporting derogatory information against CHOW. CHOW thought CI's used CHOW's name as a get out of jail free card. According to CHOW, there have been several large organized crime busts within the last ten years which may have contributed to law enforcement's suspicion of CHOW. CHOW admitted to associating with people who were involved in illegal activities. According to CHOW, he made a point never to ask these individuals about their criminal business. UCE 4599 told CHOW that when he conducts illegal business with NIEH they purposefully kept CHOW out of it. The UCE then explained the concept of La Cosa Nostra (This Thing Of Ours) and the principles of organized crime. CHOW thought establishing roles within a criminal organization was "common sense."

On October 4, 2013, UCE 4872 arranged a meeting with an associate of GEE in a parking lot of a coffee shop located in Atlanta, Georgia to conduct a money laundering transaction. The cash total was later confirmed to be $150,000. The associate provided the cash to UCE 4599. On October 8, 2013, NIEH picked up UCE 4599 in San Francisco and drove to meet GEE. UCE 4599 delivered $144,000 cash. GEE said he would be traveling to China and asked UCE 4599 to conduct future deals with Anthony LAI. UCE 4599 paid NIEH $600 for facilitating this money laundering deal.

On October 8, 2013, UCE 4599 arranged a meeting with RINN ROEUN at his place of employment, an automobile glass repair shop, located in San Francisco, California, to purchase a firearm. UCE 4599 drove to 863 Bryant Street, San Francisco to meet with ROEUN. Once at the location, ROEUN entered UCE 4599's vehicle. UCE 4599 provided ROEUN with $1,000. ROEUN gave the handgun to UCE 4599. ROEUN told the UCE he had several other assault rifles that would be

available for purchase in the near future. Upon inspection, the handgun was a Taurus, Model Judge, .45 caliber.

On October 10, 2013, UCE 4599 arranged a meeting with LI and CHANTHAVONG at a restaurant in San Francisco. The purpose of the meeting was to discuss illegal business opportunities with LI and CHANTHAVONG. LI asked UCE 4599 if he had the capability to launder drug proceeds in a similar fashion as to what UCE 4599 was doing in New Jersey with NHINGSAVATH. LI advised he was looking to launder approximately $80,000 on a routine basis. UCE 4599 told LI he would charge a higher percentage fee to launder the money because it was a smaller amount than UCE 4599 usually dealt with. UCE 4599 told CHANTHAVONG he spoke with his associates in New Jersey and would be able to produce large quantities of Johnny Walker Black for $22.00 per bottle. CHANTHAVONG said he would check with his associates to see if they would be interested. LI, CHANTHAVONG and UCE 4599 discussed ways to hide assets so they could not be detected by government authorities. UCE 4599 thought it was a bad idea to hide assets by putting them in their girlfriend's name. LI told UCE 4599 that CHOW hides his assets by putting them under his girlfriend's name.

On October 15, 2013, UCEs 3010 and UCE 3129 arranged a meeting with "Jimmy" [later identified as Gary CHEN] and another individual in a parking lot at a retail store located in Saugus, Massachusetts, to conduct a money laundering transaction. At the meeting location, GARY CHEN was in the front passenger seat. CHEN approached the UCE vehicle with a gray backpack retrieved from the trunk and entered the front passenger area of the UCE vehicle. GARY CHEN introduced himself as "Jimmy". UCE 3129 admonished GARY CHEN for being late. GARY CHEN apologized. GARY CHEN stated he had $102,500 and noted there was a paper note in the bag indicating such. UCE 3010 told GARY CHEN that it was nice doing business with GARY CHEN and hoped that the relationship would continue. All parties depart the area in the vehicles they arrived in. The cash amount was later confirmed to be $102,790.

On October 16, 2013, UCE 4599 arranged to meet with LAI at a restaurant in San Francisco. The purpose of the meeting was to provide LAI with $98,678 in laundered drug proceeds. LAI met with UCE 4599 on behalf of GEE, who was in China at the time. UCE 4599 provided LAI with a Federal Express Box containing $98,678. LAI told UCE 4599 he operated an indoor marijuana cultivation operation in Oakland. The aforementioned marijuana grow was robbed and subsequently shut down. LAI did not bypass the power and owed PG&E approximately $22,000. LAI told UCE 4599 when he first met UCE 4599 he thought UCE 4599 looked like a "narc" (undercover narcotics officer). UCE 4599 dismissed the notion and told LAI he had been associated with CHOW for almost four years and was time tested when it came to trust. UCE 4599 and LAI discussed the next money laundering opportunity in Boston scheduled for the following week. Both departed from the restaurant at the conclusion of the meeting. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1956(a)(1)(A) and (B) and 2 by Elaine LIANG, GEE, CHEN, and LAI.**

On October 17, 2013, UCE 4599 arranged to meet KEITH JACKSON and MARLON SULLIVAN at a restaurant located in San Francisco. The purpose of the meeting was to discuss illegal activities with SULLIVAN and KEITH JACKSON. SULLIVAN and KEITH JACKSON were upset with the lack of progress regarding a purported cocaine transaction with UCE 4599's fictitious source of supply (SOS) for cocaine. UCE 4599 told SULLIVAN and KEITH JACKSON that due to a recent interdiction by law enforcement, UCE 4599's SOS was revamping his cocaine distribution strategy. According to KEITH JACKSON, they had money already allocated for the deal and were disappointed in the lack of progress. SULLIVAN asked UCE 4599 if he had the ability and resources to transport narcotics. UCE 4599 asked SULLIVAN if he still had the Postmaster contact in Memphis, Tennessee who facilitated the transportation of marijuana though the USPS. SULLIVAN acknowledged he still had the Postmaster contact.

During the meeting, KEITH JACKSON told UCE 4599 he needed to talk to SENATOR YEE, a.k.a. Uncle Leland, about brokering a meeting with an individual who trafficked in weapons. According to KEITH JACKSON, the arms trafficker was attempting to ship weapons to the Philippines because there was an ongoing war between an unidentified Philippine Muslim rebel group and the Philippine Government. KEITH JACKSON told UCE 4599 "That's a good one for us" and further added "I will make it happen." UCE 4599 stated he believed SENATOR YEE was all about taking money from people and not delivering on his promises. SULLIVAN told UCE 4599 he had been trafficking narcotics for six to seven years. According to SULLIVAN, BRANDON JACKSON, was an "intermediary" who acted on SULLIVAN's behalf.

On October 23, 2013, two UCEs arranged a meeting with GARY CHEN in Everett, Massachusetts to conduct a money laundering operation. At the meeting location, GARY CHEN arrived in a GMC SUV with Massachusetts plates. GARY CHEN retrieved a plastic bag from the vehicle and walked towards the UCEs vehicle. CHEN sat in the front passenger seat of the UCEs vehicle. CHEN told the UCEs that the plastic bag contained $135,000 in bundles of cash. CHEN described that he was from San Francisco. The cash total was later confirmed to be $134,145.

On October 24, 2013, UCE 4599 arranged to meet with LAI at a coffee shop in San Francisco. The purpose of the meeting was to provide LAI with laundered drug proceeds to conclude the money laundering transaction on October 23, 2013 in Everett, Massachusetts with CHEN. UCE 4599 handed LAI a Federal Express box which contained $128,800. UCE 4599 and LAI discussed setting up another money laundering deal in Boston for the following week. UCE 4599 requested the amount be no greater than $200,000 at a time.

On October 30, 2013, UCE 4599 arranged a meeting with CHOW at a restaurant in San Francisco. The purpose of the meeting was to discuss illegal business opportunities with CHOW. CHOW advised he had a conversation with CHOW's associate about conducting illegal

business with UCE 4599. According to CHOW, CHOW's associate was apprehensive about conducting any type of illegal activity with UCE 4599 because UCE 4599 was not Chinese. CHOW was still upset with Andy LI over their recent physical altercation and advised that he had cut all ties with LI and CHANTHAVONG. CHOW discouraged UCE 4599 from doing any business with Andy LI. CHOW's associate entered the restaurant and sat down for lunch with CHOW and UCE 4599. UCE 4599 handed CHOW and two white envelopes which contained a total of $2,500. UCE 4599 told CHOW the envelope marked with a "G" was for George NIEH. UCE 4599 told CHOW things were going well with Elaine LIANG and Serge GEE. CHOW thanked UCE 4599.

On November 1, 2013 two UCEs arranged to meet with NHINGSAVATH and another individual in a parking lot in a mall located in Paramus, New Jersey to conduct a money laundering transaction. At the meeting location, a black Jeep pulled next to the UCE vehicle. NHINGSAVATH exited from the passenger side. NHINGSAVATH retrieved a box from the rear driver's side compartment and gave the box to one of the UCEs. Both parties departed from the parking lot. The cash amount was later confirmed to be $104,220.

On November 4, 2013, UCE 4599 arranged for NHINGSAVATH to meet with UCE 3322 at Beale and Howard Streets in San Francisco. UCE 3322 provided NHINGSAVATH with $101,150. NHINGSAVATH wanted to know if they could continue to launder money while UCE 4599 was on vacation. UCE 3322 told him he was not sure and they both left.

On December 3, 2013, UCE 4599 arranged to meet KEITH JACKSON at a hotel in San Francisco. The purpose of the meeting was to discuss illegal business opportunities with JACKSON. UCE 4599 provided KEITH JACKSON with an update on the previously discussed sale of cocaine to BRANDON JACKSON and SULLIVAN. According to KEITH JACKSON, SULLIVAN and BRANDON JACKSON had enough money for 10 kilograms of cocaine. UCE 4599 told KEITH JACKSON the approximate price for the cocaine would be $26,500 per kilogram. According to KEITH

JACKSON, BRANDON JACKSON owed CHANTHAVONG approximately $9,000 for an unpaid drug debt. KEITH JACKSON was trying to negotiate with CHANTHAVONG on behalf of BRANDON JACKSON. KEITH JACKSON told UCE 4599 that he spoke with SENATOR YEE about the opportunity to traffic firearms. KEITH JACKSON told the UCE the weapons source of supply (SOS) was the "Real Deal." KEITH JACKSON said that SENATOR YEE gave KEITH JACKSON the permission to pursue the opportunity with UCE 4599. Specifically, KEITH JACKSON and SENATOR YEE were going to meet with the SOS to hash out a plan. SENATOR YEE requested that KEITH JACKSON broker all of the conversations regarding weapons trafficking with the SOS. UCE 4599 told KEITH JACKSON he would be compensated for his assistance. KEITH JACKSON believed SENATOR YEE needed to develop a level of comfort with UCE 4599. According to KEITH JACKSON, SENATOR YEE thought there would be an opportunity to launder the proceeds from the sales of future weapons.

During the same meeting, KEITH JACKSON told UCE 4599 he recently met with Barry HOUSE. KEITH JACKSON pointed to his bicep muscle and told UCE 4599 if s/he ever needed anything from HOUSE let him know. UCE 4599 told KEITH JACKSON he wanted one of his associates killed and asked if HOUSE could assist. KEITH JACKSON asked the race of the intended target and his location. KEITH JACKSON told UCE 4599 he would talk to HOUSE in person. KEITH JACKSON said if he didn't get HOUSE to commit the murder he would ask ROEUN. UCE 4599 told KEITH JACKSON he would prefer to work with HOUSE. UCE 4599 told KEITH JACKSON he would pay HOUSE $25,000 for the murder. KEITH JACKSON told UCE 4599 he would talk to HOUSE the following day. KEITH JACKSON reiterated that ROEUN and his associates had the capabilities to kill people at a cheaper price than what the UCE was willing to pay.

On December 5, 2013, two UCEs met with CHEN in a parking lot in Saugus, Massachusetts. CHEN was driven by another individual. CHEN exited his vehicle and got into the UCE vehicle.

CHEN placed a white plastic bag on the floor and removed several stacks of cash. CHEN said the bag contained a "flat 200," meaning $200,000. On further inspection, it contained $199,240. The UCE asked CHEN where he earned the money. CHEN stated he earned it "on the street" by "pushin' and everything." CHEN said it was from selling "weed." CHEN said that the area was a "pretty good market." The UCE asked CHEN if CHEN would consider partnering to sell drugs. CHEN said he understood and that they could discuss it in the future. CHEN then left.

On December 6, 2013, UCE 4599 arranged to meet NIEH and LAI at a café in Millbrae, California. The purpose of the meeting was to provide $191,270 in laundered drug proceeds to LAI to conclude the money laundering transaction on December 5, 2013. NIEH picked up UCE 4599 at 388 Beale Street, San Francisco and drove to Peter's Café, Millbrae, California. According to NIEH, PAU owned an apartment in the vicinity of Hyde Street and Broadway in San Francisco which was currently being utilized by CHOW. NIEH and UCE 4599 met with LAI inside Peter's Café. UCE 4599 gave LAI a Federal Express box containing $191,270. LAI asked UCE 4599 when his associates in Boston could be ready for another money laundering transaction. According to LAI, GEE was currently vacationing in the Maldives. LAI worked directly for GEE and was being paid for his services while GEE was away. After lunch, NIEH drove UCE 4599 back to San Francisco. During the ride back, UCE 4599 asked if Ming MA could provide any firearms. NIEH told UCE 4599 guns were hard to get at the moment. NIEH pulled out a Beretta 9MM handgun from the center console. NIEH paid $1,200 for the gun. NIEH advised he also kept a 9MM handgun in the trunk portion of his vehicle. UCE 4599 provided NIEH with $800.00 for his assistance during the money laundering transaction with LAI. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1956(a)(1)(A) and (B) and 2 by CHEN, LAI, GEE, Elaine LIANG, and NIEH.**

On December 10, 2013, UCE 4599 met with Keith JACKSON, Brandon JACKSON, and SULLIVAN at a restaurant. They discussed that they were ready with money to purchase up to 10 kilos

of cocaine from UCE 4599's source of supply. UCE 4599 said they could do the deal in mid-January and the cocaine would cost $26,500 per kilo. SULLIVAN later showed UCE 4599 several fraudulent credit cards out of his wallet.

On December 13, 2013, UCE 4599 met with KEITH JACKSON and BRANDON JACKSON at Roy's Restaurant, San Francisco, California. KEITH JACKSON said he had spoken to SENATOR YEE about setting up a meeting with a weapons trafficker. According to KEITH JACKSON, SENATOR YEE was going to call the trafficker the same day. KEITH JACKSON also advised that SENATOR YEE had an unidentified Filipino associate who was supplying "heavy" weapons to rebel groups in the Philippines. UCE 4599 handed KEITH JACKSON a white envelope containing $1,000. UCE 4599 told KEITH JACKSON the $1,000 was motivation for setting up the meeting with the weapons trafficker. According to KEITH JACKSON, the weapons trafficker had access to cargo containers full of weapons. UCE 4599 asked BRANDON JACKSON if the fraudulent credit cards that were being produced by SULLIVAN were reliable. BRANDON JACKSON confirmed they were reliable. KEITH JACKSON advised they could be used for gas and food. BRANDON JACKSON and KEITH JACKSON talked to UCE 4599 about a previously discussed cocaine transaction with UCE 4599's purported source of supply for cocaine. KEITH JACKSON asked if UCE 4599 could assist in laundering the profits from the purported cocaine deal. BRANDON JACKSON advised that he and SULLIVAN would reinvest their initial profit from the first cocaine deal to buy more narcotics. KEITH JACKSON and UCE 4599 talked about a previously discussed murder for hire contract involving SULLIVAN and his associates. With reference to the contract for murder, KEITH JACKSON told UCE 4599 "I want to keep that with us." KEITH JACKSON told UCE 4599 that an individual (later identified as Dr. Wilson LIM), was working to ship weapons to the Philippines. BRANDON JACKSON received a text on his cellular telephone from SULLIVAN requesting a name or an address for the intended target of UCE 4599's plan for murder. According to BRANDON JACKSON,

SULLIVAN had a contact within the California Department of Motor Vehicles who could procure a photograph of the intended target. BRANDON JACKSON told UCE 4599 they wanted to gather as much intelligence on the intended target to include his daily routine.

On December 17, 2013, UCE 4599 arranged a meeting with KEITH JACKSON and SULLIVAN at a restaurant located in San Francisco, California. UCE 4599 provided KEITH JACKSON with a $5,000 check from another fictitious company belonging to UCE 4599, made out to Leland Yee, Secretary of State. KEITH JACKSON advised that he and SENATOR YEE would be meeting with an international weapons trafficker within the next few days. According to KEITH JACKSON, SENATOR YEE understood UCE 4599 wanted to meet with the arms dealer. KEITH JACKSON told UCE 4599 he would make sure the meeting would happen.

According to KEITH JACKSON, SENATOR YEE fully understood the check being provided to SENATOR YEE's campaign was solely for the purpose of getting an introduction to the arms dealer. KEITH JACKSON said "we just talked about that today."

UCE 4599 told KEITH JACKSON he wanted to receive a call from SENATOR YEE to acknowledge receiving the check. KEITH JACKSON received a call from SENATOR YEE in the presence of UCE 4599 and handed the phone to UCE 4599. UCE 4599 told SENATOR YEE he had raised $5,000 for his campaign and looked forward to meeting their "mutual friends." UCE 4599 told SENATOR YEE he was looking forward to immediate opportunities with SENATOR YEE. After the call with SENATOR YEE, KEITH JACKSON inquired about a purported cocaine deal with SULLIVAN and BRANDON JACKSON. KEITH JACKSON advised that SULLIVAN and BRANDON JACKSON would pay KEITH JACKSON a percentage from the profits of the cocaine deal. SULLIVAN provided the following counterfeit credit cards to UCE 4599: one Bank of America Visa; two Bank of America MasterCards; one Patelco MasterCard. All credit cards were under the name Joseph Viso, a fictitious name provided by UCE 4599.

On January 9, 2014, UCE 4599 met with CHOW and NIEH. NIEH and CHOW picked up UCE 4599 at 388 Beale Street, San Francisco and drove to Yank Sing restaurant, San Francisco. UCE 4599 provided CHOW with a white envelope containing $1,500. UCE 4599 told CHOW the money was payment for previous money laundering deals with Elaine LIANG and Serge GEE. UCE 4599 complained about the lack of communication between UCE 4599 and LAI. UCE 4599 told CHOW and NIEH they would be missing out on approximately $4,000 per month if the relationship with GEE and LIANG was discontinued. CHOW was trying to recall if he ever met LAI. UCE 4599 gave NIEH $500 and requested NIEH to get his phone issues fixed.

On January 22, 2014, UCE 4599 arranged to meet KEITH JACKSON and SENATOR YEE at a coffee shop located in San Francisco to discuss details of an international weapons trafficking transaction with SENATOR YEE and KEITH JACKSON. While waiting for SENATOR YEE to arrive, KEITH JACKSON told UCE 4599 he, KEITH JACKSON, was confident the weapons deal would happen but it would require KEITH JACKSON's involvement every step along the way. According to KEITH JACKSON, the source of supply for the weapons was extremely cautious about meeting UCE 4599. KEITH JACKSON encouraged UCE 4599 to talk to SENATOR YEE about the timeline and specifics of the weapons deal because the arms dealer was SENATOR YEE's contact. UCE 4599 told KEITH JACKSON he gave $5,000 to SENATOR YEE for the sole purpose of meeting the arms dealer. KEITH JACKSON understood that the arms dealer was SENATOR YEE's contact and encouraged UCE 4599 to broach that conversation with SENATOR YEE.

KEITH JACKSON continued the conversation by telling UCE 4599, SULLIVAN was in the process of manufacturing fake credit cards for UCE 4599. UCE 4599 told KEITH JACKSON that he would get in touch with SULLIVAN over the next few days.

UCE 4599 and KEITH JACKSON were greeted by SENATOR YEE. UCE 4599 understood SENATOR YEE had some recent discussions with the arms dealer. SENATOR YEE explained he has

known the arms dealer for a number of years and has developed a close relationship with him. SENATOR YEE told UCE 4599 that the arms dealer "Has things that you guys want." SENATOR YEE cautioned that doing business with people like the arms dealer was not easy and told UCE 4599 this was not a business for "the faint of heart." SENATOR YEE explained the arms dealer was very cautious about who he conducted business with. SENATOR YEE would tell the arms dealer to work with KEITH JACKSON because SENATOR YEE trusted KEITH JACKSON.

UCE 4599 explained he understood the complexity of trafficking weapons and the importance of remaining safe. While UCE 4599 had confidence in KEITH JACKSON, he wasn't sure KEITH JACKSON would able to address any of the arms dealer's issues without direct input from UCE 4599. The arms dealer was willing to "surface himself" at SENATOR YEE's request. According to SENATOR YEE, the arms dealer advised YEE on how the weapons deal would unfold. According to SENATOR YEE the arms dealer is "low-key" and has been trafficking weapons for quite a while. According to SENATOR YEE, the arms dealer sourced the weapons from Russia. SENATOR YEE thought the ability to traffic weapons with the arms dealer would be based on trust and would take time. SENATOR YEE said "We're interested" in arranging the weapons deal and thought the arms dealer would go back to talk to "his folks." SENATOR YEE said of the arms dealer, "He's going to rely on me, because ultimately it's going to be me."

UCE 4599 stated he would compensate SENATOR YEE for brokering the relationship and arms deal with the arms dealer. UCE 4599 stated he had made a monetary commitment to SENATOR YEE and wanted assurance the weapons deal was a real opportunity. SENATOR YEE told UCE 4599 he was right to be suspicious and cautious but assured UCE 4599 he wasn't going to let him go on a "wild goose chase." SENATOR YEE assured UCE 4599 the opportunity to purchase weapons from the arms dealer was real. SENATOR YEE said "I know what he could do. I have seen what he has done in the

past on other products and this guy has the relationships." SENATOR YEE emphasized that the arms dealer took baby steps and was very careful.

According to SENATOR YEE, the arms dealer had contacts in Russia, Ukraine, Boston and Southern California. UCE 4599 asked SENATOR YEE for his commitment. SENATOR YEE said "Do I think we can make some money? I think we can make some money. Do I think we can get the goods? I think we can get the goods." SENATOR YEE thought it was more about the timing and who was going to get directly involved. SENATOR YEE said he believed KEITH JACKSON had to be committed to making the deal happen. KEITH JACKSON told SENATOR YEE "I'm in man."

SENATOR YEE said that he wanted KEITH JACKSON and UCE 4599 to understand what they were about to get into. SENATOR YEE cautioned UCE 4599 and KEITH JACKSON and recounted a story of the last time he was in the Philippines. According to SENATOR YEE, he was surrounded by "armed guards with machine guns." SENATOR YEE said "Because, I'm getting a little more into this, it's not just Russia; the Muslim countries have sources too. And so, that has been brought to my attention recently."

KEITH JACKSON asked UCE 4599 "You know what you want right?" UCE 4599 told SENATOR YEE and KEITH JACKSON he wanted any type of "shoulder fired" weapons or missiles. SENATOR YEE asked UCE 4599 if he wanted "automatic weapons" as opposed to semi-automatic weapons. UCE 4599 confirmed with SENATOR YEE he wanted automatic weapons. KEITH JACKSON asked UCE 4599 about the quantity. UCE 4599 told SENATOR YEE and KEITH JACKSON anywhere between $500,000 - $2,500,000 worth of weapons.

With regards to the specific weapons and quantity, SENATOR YEE directed UCE 4599 to let KEITH JACKSON know. KEITH JACKSON would communicate with SENATOR YEE who in turn would communicate with the arms dealer directly. SENATOR YEE further added "I don't think we need to worry about that. I think we ought to focus our attention on developing this relationship."

UCE 4599 told SENATOR YEE he appreciated the opportunity with the arms dealer and that he had contributed directly and indirectly to SENATOR YEE's campaign [referencing campaign contributions to SENATOR YEE made in exchange for official action by other associates of UCE 4599]. SENATOR YEE told UCE 4599 he saw their relationship as tremendously beneficial. When SENATOR YEE became Secretary of State he wanted UCE 4599 and KEITH JACKSON to make all the money because he didn't "want to go to jail." UCE 4599 promised SENATOR YEE he would take care of those who took care of him and would pay SENATOR YEE and KEITH JACKSON "hundreds of thousands of dollars." SENATOR YEE instructed UCE 4599 to tell his family that when he won the election for California Secretary of State he would appoint UCE 4599 to a Russian delegation. UCE 4599 told SENATOR YEE he was looking for something more immediate. UCE 4599 asked SENATOR YEE for a direct introduction to the arms dealer. SENATOR YEE refused but said "Look, he knows what I want. I have opened the discussion. What I got to help him understand is that KEITH [JACKSON] is a conduit to other people." UCE 4599 told SENATOR YEE depending on the size of the first deal he would pay SENATOR YEE and KEITH JACKSON $100,000. SENATOR YEE said "Alright, take care." The meeting ended.

On January 24, 2014, UCE 4599 arranged to meet KEITH JACKSON at a restaurant in San Francisco. The purpose of the meeting was to discuss illegal activities with KEITH JACKSON. UCE 4599 provided KEITH JACKSON with a white envelope containing $1,000. UCE 4599 told KEITH JACKSON he wanted a meeting with the arms dealer by February 12, 2014. KEITH JACKSON told UCE 4599 he would put off other requests made by SENATOR YEE until SENATOR YEE acquiesced and set up the meeting with the arms dealer. According to KEITH JACKSON, SENATOR YEE was afraid of being cut out of the opportunity to make money on the weapons trafficking deal if UCE 4599 struck a relationship with the arms dealer directly. UCE 4599 assured KEITH JACKSON he would pay SENATOR YEE at least $100,000 upon completion of the first weapons transaction.

KEITH JACKSON also advised there was an opportunity to procure weapons through a "Filipino connection." According to KEITH JACKSON, one of the "Filipinos" had a nephew in the Philippines who was supplying weapons to Muslim Rebel Groups in the Philippines. KEITH JACKSON thought SENATOR YEE was nervous about introducing UCE 4599 to the first arms dealer because of UCE 4599's connection to Raymond CHOW. KEITH JACKSON said SENATOR YEE liked CHOW but didn't trust him. UCE 4599 told KEITH JACKSON he paid SENATOR YEE $5,000 to set up the meeting with the arms dealer and he expected SENATOR YEE to deliver on his promise. KEITH JACKSON said that SENATOR YEE brought the opportunity to traffic weapons to KEITH JACKSON during a trip to Los Angeles. KEITH JACKSON said he picked up SENATOR YEE and the arms dealer at the airport, and SENATOR YEE directed KEITH JACKSON to work with the arms dealer on trafficking weapons.

UCE 4599 told KEITH JACKSON he was supposed to meet with SULLIVAN regarding the purchase of fraudulent credit cards. KEITH JACKSON also advised that Rinn ROEUN had access to approximately 50 weapons. According to KEITH JACKSON, when SENATOR YEE told UCE 4599 he went to the Philippines and was surrounded with 15 armed guards, it was the same Muslim Rebel Group being supplied by the nephew of the aforementioned Filipino. KEITH JACKSON stated he was going to meet with the owner of a marijuana dispensary in San Francisco to pick up a campaign donation on behalf of SENATOR YEE. KEITH JACKSON surmised this would be a good year for medical marijuana legislation. KEITH JACKSON told UCE 4599 that CHOW and his girlfriend recently broken up. CHOW was living at an apartment on Hyde Street in San Francisco.

On January 28, 2014, UCE 4599 met with NIEH and YUN. NIEH picked UCE 4599 up in his car and they drove to Millennium Therapeutics to meet with YUN. UCE 4599 and YUN discussed the sale of approximately 200 master cases (12,000 cartons) of purportedly stolen cigarettes in New York

City in the future. The price per carton to YUN would be $28 per carton and YUN would sell them for $32 per carton. YUN also offered to sell pounds of Snowberry Kush (a type of marijuana).

On January 28, 2014, UCE 4599 met with Keith JACKSON and Brandon JACKSON at a restaurant in San Francisco, California. Brandon JACKSON provided UCE 4599 with an envelope containing 25 fraudulent credit cards. UCE 4599 gave Brandon JACKSON a white envelope containing $1,250 as payment for the credit cards.

On February 3, 2014, UCE 4599 arranged to meet with BRANDON JACKSON and SULLIVAN at a hotel in San Francisco. At the meeting, SULLIVAN stated that he had spent $15,000 preparing for a 10 kilogram transaction with UCE 4599's associates. SULLIVAN also stated that he got an apartment to use as a stash house in Hartford, Connecticut, and a vehicle with a concealment compartment. SULLIVAN stated that while he was conducting the cocaine transaction with UCE 4599 and his associates, BRANDON JACKSON would wait at the apartment in Hartford. SULLIVAN also stated that he sent a cocaine press and other equipment from San Francisco to Hartford. UCE 4599 told SULLIVAN to be careful transporting the cocaine from New Jersey to Hartford. SULLIVAN said if he were pulled over by law enforcement, he would be able to talk his way out of it because he was not "hood." UCE 4599 told SULLIVAN that the fraudulent credit cards SULLIVAN provided worked very well. SULLIVAN produced a fraudulent American Express Bluebird card in another person's name. They discussed the murder for hire proposed earlier. UCE 4599 told SULLIVAN he would bring the intended target to a restaurant in San Francisco so that SULLIVAN could get a good physical description of the intended target. UCE 4599 told SULLIVAN that the intended target was living in Reno, Nevada, and travelling to the Bay Area to visit someone. UCE 4599 asked SULLIVAN not to kill the target in the presence of UCE 4599. SULLIVAN and BRANDON JACKSON assured UCE 4599 that would not happen.

SULLIVAN asked if UCE 4599 would be able to launder proceeds from SULLIVAN's cocaine deal. UCE 4599 said that he could. SULLIVAN stated that he was prepared to do 10 years in prison at any time, that he had a clean criminal record, and that "Ten is the max I'll get." SULLIVAN told UCE 4599 that living a criminal lifestyle was more of a "power and challenge thing," that SULLIVAN didn't have to manufacture fraudulent credit cards, but "it was fun."

SULLIVAN and UCE 4599 discussed diluting or "stepping on" the cocaine to maximize profit. SULLIVAN stated he used Inositol as a cutting agent for the cocaine. SULLIVAN paid for the bill from the restaurant with a fraudulent credit card and SULLIVAN showed UCE 4599 a fraudulent California driver's license. UCE 4599 asked if SULLIVAN had the stuff to make fraudulent credit cards at his residence and SULLIVAN replied "I got another spot." SULLIVAN advised UCE 4599 to "always get another spot for different operations." SULLIVAN said he purchased the electronic keys for the fraudulent credit cards from an unknown individual in Russia who was identified as "The President." SULLIVAN stated he used web sites to include ICQ to contact sellers of electronic keys and that SULLIVAN paid for the electronic keys with the virtual currency, Bitcoin.

On the murder for hire, SULLIVAN stated "it's easy work" and added "I will put eyes on the guy and have my boy knock him down." UCE 4599 stated he thought that SULLIVAN would bring someone from the East Coast to murder the intended target. SULLIVAN replied "I got a hundred niggas, I still got my ties to the street. I got young boys who love me."

On February 5, 2014, UCE 4599 met with LI at a restaurant in San Francisco. LI said NHINGSAVATH was a victim of a home invasion robbery and that he and his girlfriend were zip tied and assaulted. NHINGSAVATH supposedly lost 50 pounds of processed marijuana, jewelry, clothes, electronics, and cash. LI thought NHINGSAVATH was targeted after bringing a stripper home a week before the home invasion. LI said the home invasion crew was Mexican and did not wear masks. LI thought they were inexperienced since they didn't wear masks and they didn't kill NHINGSAVATH or

his girlfriend. LI said he reached out to a ranking member of a Mexican gang to get information on who did the home invasion. LI discussed his rift with CHOW. According to LI, CHOW introduced CHANTHAVONG to people in New York and CHANTHAVONG had been conducting business with them. After the altercation between LI and CHOW, CHOW told the New York associates not to do any more business with CHANTHAVONG. LI asked if UCE 4599 wanted to purchase pounds of marijuana. UCE 4599 said he would get back to LI.

On February 5, 2014, UCE 4599 sent text messages from UCE 4599's cell phone to SULLIVAN's cell phone in preparation for SULLIVAN identifying the murder for hire victim. The following are the text messages, beginning at 10:30 a.m.:

UCE 4599: tomorrow 6PM at [restaurant] in SF

UCE 4599: big open floor plan

UCE 4599: You can probably get a good look from the bar

UCE 4599: can you make it?

At approximately 10:40 a.m., SULLIVAN responded via text with: "Okay."

On February 6, 2014, UCE 4599 and UCE 4684 (posing as the intended murder victim) staged a meeting at a restaurant in San Francisco. At approximately 5:21 p.m., UCE 4599 sent a text to SULLIVAN letting him know that the UCEs were at the restaurant. At approximately 5:44 p.m., agents observed SULLIVAN enter the restaurant wearing a black grey spotted sweater, green pants, and a red knit ball cap with a black stripe. SULLIVAN scanned the area and took a seat at the bar facing the dining area where UCE 4599 and UCE 4684 sat, with a clear view of UCE 4684. At approximately 6:13 p.m., SULLIVAN left the restaurant. Later, they exchanged these texts from cell phone to cell phone:

February 6, 2014

At 6:23 p.m., UCE 4599: Get what you needed?

February 7, 2014

At 12:04 a.m., SULLIVAN: All good.

At 8:49 a.m., UCE 4599: Cool, when you walked into the restaurant I thought you were going to jack the place

March 3, 2014

At 12:06 p.m., UCE 4599: I still owe you $10,000 for that matter [referring to murder for hire] I didn't forget

At 12:16 p.m., SULLIVAN: Been waiting on you. I never will tell you what can be done if it really can't.

I believe that this demonstrates probable cause for a violation of Title 18, United States Code, Section 1958 by SULLIVAN, Keith JACKSON, and Brandon JACKSON.

On February 11, 2014, two UCEs met MASTRANGELO and another individual in a parking lot in Paramus, New Jersey to pick up money for laundering. They arrived in a blue BMW. MASTRANGELO exited the car and delivered a white box. MASTRANGELO said it contained $100,000. It was later confirmed to contain $99,930. On February 12, 2014, UCE 4599 met with NHINGSAVATH at Howard and Beale Streets in San Francisco. UCE 4599 handed NHINGSAVATH a FedEx box containing $97,000. NHINGSAVATH discussed the home invasion robbery where he was a victim.

On February 12, 2014, UCE 4599 met with KEITH JACKSON and BRANDON JACKSON at Howard and Beale Streets in San Francisco. UCE 4599 told BRANDON JACKSON that the arranged cocaine deal for the following week would be delayed until KEITH JACKSON could arrange a meeting between UCE 4599 and the arms dealer. KEITH JACKSON and UCE 4599 then headed to a sporting event together.

At the event, they continued to discuss meeting with the arms dealer. KEITH JACKSON said that SENATOR YEE also had a Filipino connection for weapons that SENATOR YEE was already "down with." KEITH JACKSON said that SENATOR YEE had dealt with the Filipino's "plenty of times." KEITH JACKSON said that SENATOR YEE asked to raise $50,000 for his Secretary of State campaign. UCE 4599 told KEITH JACKSON that he would be willing to give SENATOR YEE more money once the first shipment of weapons was complete.

On February 18, 2014, UCE 4599 arranged a meeting with NIEH and YUN to purchase pounds of marijuana. NIEH picked up UCE 4599 and they traveled to Millennium Therapeutic. UCE 4599 and NIEH met YUN and went to a restaurant. They discussed a previously arranged cigarette deal, and agreed that it would happen one month later than they had planned. YUN told UCE 4599 that she had four one pound samples of different strains of indoor marijuana for purchase. NIEH had three pounds in his car and YUN had one pound at Millennium. YUN stated her source of supply would be able to provide 50 pounds of marijuana at a time. They walked to Millennium and went into a storage area. YUN provided UCE 4599 with one pound of "Sour Diesel" marijuana. YUN confirmed that she previously gave NIEH three pounds and that it was in NIEH's vehicle. UCE 4599 paid YUN $8,200 for the marijuana. NIEH drove back to San Francisco where NIEH parked his car and opened his trunk. NIEH gave the remaining three pounds of marijuana to UCE 4599. Presumptive tests were positive for marijuana.

On February 18, 2014, UCE 4599 arranged a meeting with ROEUN at ROEUN's place of employment. ROEUN stated that his marijuana grow was robbed and that ROEUN was able to identify where the robbers lived but that it was not worth retribution. ROEUN told UCE 4599 that he would be providing UCE 4599 with two ARs, one fully automatic AK, and two handguns. UCE 4599 paid ROEUN $9,000 in cash as pre-payment for the firearms.

On February 20, 2014, Oakland Police Department (OPD) Officers, FBI and IRS Special Agents, executed a State Search Warrant issued by the Superior Court of California, County of Contra Costa, at a residence located at 5555 Merritt Drive, Concord, California (hereinafter Merritt).

Earlier, in January, 2014, an investigation began pertaining to Merritt, a residence suspected of being a site for an indoor marijuana cultivation operation. Public records showed the residence was owned by TILTON, and purchased on April 27, 2012 after foreclosure proceedings. A Special Agent of the Internal Revenue Service, reviewed mortgage documents and bank records for TILTON and found that TILTON purchased the property in cash for $342,764.87. Multiple individuals were found to deposit cash into the escrow pertaining to the purchase of Merritt, to include Tina LIANG in the amount of $100,000, Jane LIANG in the amount of $29,764.87, TILTON in the amount of $73,000, and three other associated individuals in the amounts of $70,000, $30,000 and $10,000.

On January 2, 2014, TILTON and another male were observed arriving at the Merritt address in a grey Toyota pickup. Both TILTON and the other individual entered Merritt and were seen moving a large tray from the pickup truck to the garage of the residence. TILTON and the other individual also loaded multiple large black bags from the residence into the truck.

At the Merritt search warrant location on February 20, 2014, Officers and Agents discovered an indoor marijuana grow inside the residence. No persons were present at the time the search warrant was executed. The residence had no obvious sleeping quarters as it was apparent the home was converted completely into an indoor marijuana grow site. Among items seized at the location, included 503 marijuana plants (354 with root balls and 149 without), indicia for Brian Seiki TILTON (to include a tax refund check). A representative from the Pacific Gas and Electricity (PG&E), the company that services provides power to Merritt, arrived at the residence and indicated the electricity used to power the marijuana grow equipment was supplied by stolen electricity. From my training and experience, I know it is typical for individuals involved in operating illegal marijuana grows in residences to bypass

electricity to avoid the scrutiny of law enforcement. **I believe that this demonstrates probable cause for a violation of Title 21, United States Code, Section 846 by Tina LIANG and Bryan TILTON.**

On February 25, 2014, UCE 4599 met with KEITH JACKSON at a restaurant located in San Francisco, California and planned to meet SENATOR YEE soon after at the same restaurant. During the discussion prior to the arrival of SENATOR YEE, KEITH JACKSON told UCE 4599 that SENATOR YEE was the driving force behind making the introduction between UCE 4599 and the arms dealer. By delaying the meet with the arms dealer, KEITH JACKSON felt SENATOR YEE was hindering the progress of a purported cocaine deal between UCE 4599, SULLIVAN and BRANDON JACKSON. KEITH JACKSON continued by saying the arms dealer was the "real deal" and was SENATOR YEE's "guy." According to JACKSON, SENATOR YEE was in control of introducing UCE 4599 to the arms dealer.

KEITH JACKSON stressed the importance of completing a purported cocaine transaction with SULLIVAN and BRANDON JACKSON. KEITH JACKSON told UCE 4599 he met with one of SULLIVAN's associates (not further identified) during SULLIVAN's father's funeral. The unknown associate asked KEITH JACKSON if the cocaine transaction would come to fruition. KEITH JACKSON told the unknown associate he would "make it happen." According to KEITH JACKSON, BRANDON JACKSON was currently living with his mother and was planning to move at the end of March (2014). UCE 4599 told KEITH JACKSON he owed SULLIVAN $10,000 for a previously negotiated murder for hire plot against one of UCE 4599's associates. When it came to criminal matters, KEITH JACKSON stated he preferred UCE 4599 work with "people in our circle." When SENATOR YEE arrived to the restaurant, UCE 4599 asked SENATOR YEE for some clarification on how to progress with matters related to the arms dealer. SENATOR YEE advised he needed to be careful because of the recent indictment and conviction of another California State Senator. SENATOR YEE was referring to the arrest and indictment of a California State Senator who allegedly was involved in

public corruption. SENATOR YEE believed the other State Senator was wearing a "wire" for the FBI. SENATOR YEE thought the other State Senator was a classic example of involving too many people in illegal activities. SENATOR YEE believed his arms dealer connection could in fact provide weapons to UCE 4599. SENATOR YEE took an "agnostic" stance on UCE 4599 and the dealer's purported weapons deal. SENATOR YEE said "People want to get whatever they want to get. Do I care? No, I don't care. People need certain things." SENATOR YEE recognized UCE 4599 needed assurance the weapons deal was in fact a real opportunity. According to SENATOR YEE, it was the "Real deal." SENATOR YEE encouraged UCE 4599 to start off doing small deals with the arms dealer. However, SENATOR YEE emphasized the arms dealer would not engage with UCE 4599 unless SENATOR YEE was involved. SENATOR YEE told UCE 4599 he had other sources of supply for weapons.

SENATOR YEE advised the weapons deal would probably not happen until the end of the year. SENATOR YEE would do everything he could to ensure the connection was comfortable in dealing with UCE 4599. At some point last year, SENATOR YEE wanted to move forward with facilitating conversations with the arms dealer and UCE 4599 but the arms dealer wasn't ready. SENATOR YEE was "in-sync," meaning on board, with UCE 4599 when it came to the opportunity to traffic firearms. UCE 4599 understood SENATOR YEE was in control of setting up the meeting with the arms dealer. SENATOR YEE asked what it would take to make UCE 4599 feel comfortable. UCE 4599 responded by saying he wanted to have a dialogue with the arms dealer about the logistical issues associated with trafficking firearms internationally. UCE 4599 continued by saying, he also wanted to know what type of firearms the dealer could supply. UCE 4599 specifically told SENATOR YEE he was looking to obtain weapons that were mobile, light and powerful. SENATOR YEE responded by saying he did not believe the arms dealer would openly discuss the types of weapons during the first meeting. SENATOR YEE continued by saying he thought the arms dealer would suspect UCE 4599 of

being an "agent," meaning law enforcement, if specific weapons were discussed at the initial meeting. UCE 4599 advised he anticipated spending $2,000,000 for the first shipment of weapons. UCE 4599 specifically told SENATOR YEE he was looking to obtain a container of weapons. According to SENATOR YEE, the arms dealer was "doing stuff" in a foreign country and warned that the arms dealer was a very serious person to do business with. SENATOR YEE would see what he could do to facilitate the meeting with the arms dealer.

UCE 4599 asked SENATOR YEE what he [SENATOR YEE] needed to make the meeting happen. SENATOR YEE said he believed the more people involved in the weapons deal, the greater the chances that SENATOR YEE would be implicated. UCE 4599 responded by saying he had as much to lose as SENATOR YEE if UCE 4599 was caught. UCE 4599 told SENATOR YEE he had a great life and would not do anything to jeopardize his lifestyle. SENATOR YEE stated he was unhappy with his life and said "There is a part of me that wants to be like you. You know how I'm going to be like you? Just be a free-agent out there." SENATOR YEE told UCE 4599 he wanted to hide out in the Philippines. JACKSON reiterated the importance of having UCE 4599 meet with the arms dealer. SENATOR YEE attributed his long career in public office to being careful and cautious. SENATOR YEE advised if the arms dealer was ever caught by law enforcement, he may implicate UCE 4599. UCE 4599 requested a high level meeting to talk about the fundamentals of working together. UCE 4599 assured SENATOR YEE he would not talk about specific weapons like Hell-Fire Missiles during his initial meeting with the arms dealer. UCE 4599 assured SENATOR YEE he would continue to provide him with the support he needed to be successful. SENATOR YEE said he would figure out a way for UCE 4599 to meet with the arms dealer. At the conclusion of the meeting, all departed from the restaurant.

On February 26, 2014, UCE 4599 returned to ROEUN's place of employment in San Francisco. ROEUN provided UCE 4599 with the following weapons: one silver Strum P90 .45 ACP; one black

Smith and Wesson, .44 Magnum revolver; one black AR-15 pattern rifle (with no serial number or manufacturing markings on the lower receiver, the upper receiver marked Palmetto), with a magazine marked "5.56 x 45 PMAG30"; one black and green AR-15 pattern rifle (with no serial number or manufacturing markings), with a magazine marked "5.56 x 45 PMAG30". ROEUN discussed his source of supply for firearms. **I believe that this demonstrates probable cause for a violation of Title 18, United States Code, Section 922(a)(1) by ROEUN.**

On February 28, 2014, SFPD conducted surveillance on an annual HST dinner at New Asia Restaurant in Chinatown. Among the attendees were CHOW, SENATOR YEE, [redacted] Ming MA, George NIEH, Kevin SIU, Leslie YUN, and James PAU. According to SFPD Gang Task Force surveillance, SENATOR YEE gave a speech at the event.

On March 4, 2014, KEITH JACKSON contacted UCE 4599 by telephone. JACKSON reported that YEE wanted to shift to another source to get weapons for UCE 4599 – Dr. Wilson LIM. KEITH JACKSON offered to set up a meeting for UCE 4599 with SENATOR YEE on March 5, 2014, to discuss this new potential source of supply. UCE 4599 asked about logistics and told KEITH JACKSON that UCE 4599 intends to bring any weapons back through the Port of Newark, New Jersey.

On March 5, 2014, UCE 4599 met with KEITH JACKSON and SENATOR YEE at a hotel restaurant located in San Francisco, California to discuss firearms trafficking. At the restaurant, prior to the arrival of SENATOR YEE, KEITH JACKSON advised that a person later identified as Dr. Wilson LIM, would be the point of contact in the United States for the weapons deal in the Philippines. One of LIM's relatives would be the contact in the Philippines. KEITH JACKSON and BRANDON JACKSON met with LIM the previous Sunday. According to KEITH JACKSON, LIM was excited to meet UCE 4599. LIM's associates in the Philippines were trying to overthrow the current government and needed

money. KEITH JACKSON advised that the prior source of weapons was currently tied up with matters related to world affairs. Later at the restaurant, SENATOR YEE arrived. UCE 4599 told SENATOR YEE his family in New Jersey wanted to give their full support to SENATOR YEE's bid for California Secretary of State. UCE 4599 told SENATOR YEE his family controlled a large portion of the Port of Newark, New Jersey and was currently establishing companies in support of a weapons trafficking deal. SENATOR YEE told UCE 4599 he appreciated UCE 4599's father's perspective and support and continued by saying "I can be of help to you for 10 months or I can be of help to you for eight years. I think eight years is a lot better than 10 months." SENATOR YEE hoped that he would win his bid for Secretary of State but if he didn't, SENATOR YEE wanted to move into the private sector and exploit all the relationships he had in Asia for various kinds of activities.

SENATOR YEE was rapidly depleting his campaign funds and asked UCE 4599 to contribute money to his Secretary of State campaign. UCE 4599 reiterated his support and asked for their plan, SENATOR YEE and LIM, on the weapons trafficking deal. SENATOR YEE explained LIM was originally from the Mindanao region of the Philippines. According to SENATOR YEE, Mindanao was largely populated by Muslim rebel groups who were fighting the federal government. SENATOR YEE continued by saying the Muslim rebels had no problem "kidnapping individuals, killing individuals and extorting them for ransom." SENATOR YEE recalled a trip approximately two years ago where SENATOR YEE visited Mindanao at the invitation of the Mindanao government. SENATOR YEE said when he arrived, he was surrounded by numerous armed guards carrying automatic rifles.

SENATOR YEE stated that LIM's SOS for the weapons was a Philippine citizen who previously sold guns to individuals (not further identified) from Florida. LIM's SOS delivered a shipment of weapons to the port of Cagayan de Oro. The weapons were picked up by the unidentified individuals from Florida and shipped to an unknown location. SENATOR YEE stated he thought that was "The ideal way of handling it." UCE 4599 explained he had holding companies established the Port of

Newark, New Jersey. UCE 4599 told SENATOR YEE he would pick up the weapons in the Philippines and ship them back to the Port of Newark. From there, a portion of the weapons would be shipped to Sicily and then on to North Africa. UCE 4599 asked SENATOR YEE if the SOS could ship the weapons directly to the United States. SENATOR YEE explained it would be easier if UCE 4599 picked up the weapons in the Philippines.

According to SENATOR YEE, the SOS for weapons was surprised to hear UCE 4599 wanted to spend $2,000,000 for the initial purchase of weapons. SENATOR YEE thought $2,000,000 was a lot of money and said "We can't catch attention to any of this stuff." UCE 4599 reiterated they would pick up the weapons and bring it back to New Jersey. UCE 4599 told SENATOR YEE he understood the importance of practicing discretion and not garnering any unwanted attention. SENATOR YEE told UCE 4599 he "Wanted to protect the entire enterprise" to include the SOS and UCE 4599. SENATOR YEE talked about the lifecycle of the weapons deal from the initial pick-up in Cagayan de Oro to the transfer the weapons back to "U.S. territories." UCE 4599 told SENATOR YEE he was least worried about getting the weapons back to the United States.

SENATOR YEE advised the Philippines was a very corrupt country and UCE 4599 needed to be prepared to pay people at every level during the lifecycle of the deal. UCE 4599 told SENATOR YEE his family controlled a big portion of the Port of Newark and was accustomed to paying people off. SENATOR YEE told UCE 4599 he visited New Jersey and felt like he was back in the 1950s.

UCE 4599 asked SENATOR YEE what type of weapons the SOS in the Philippines had access to. Specifically, UCE 4599 asked about shoulder fired automatic weapons. SENATOR YEE responded by saying the automatic weapons are the equivalent to the "M16" Automatic Service Weapon. SENATOR YEE told UCE 4599 when you move a lot of "stuff" people notice you. SENATOR YEE said he told LIM if he were UCE 4599, he would not send a boat to the Philippines for 50 rifles. UCE 4599 asked about the availability of shoulder fire missiles or rockets. SENATOR YEE responded "I told him about

rocket launchers and things like that." SENATOR YEE asked UCE 4599 to provide an inventory list of desired weapons and he would see what they can do. According to SENATOR YEE, LIM wanted to know how UCE 4599 planned on remitting payment. UCE 4599 told SENATOR YEE he would deliver $2,000,000 cash. UCE 4599 asked about larger scale weapons systems like artillery. SENATOR YEE explained Mindanao is a "war zone." SENATOR YEE stated he had a conversation with his other proposed source of supply about the illegality of U.S. citizens purchasing weapons overseas. SENATOR YEE told UCE 4599 to be careful because this was "major stuff." SENATOR YEE asked if this was the first time UCE 4599 had ever engaged in a weapons deal. UCE 4599 told SENATOR YEE his family used to source Russian made weapons through Canada. UCE 4599 told SENATOR YEE he understood the importance and impact of having SENATOR YEE as California Secretary of State to his family's business. SENATOR YEE stated he thought there were multiple opportunities to help. SENATOR YEE continued by saying he thought Africa was a largely untapped market for trade. SENATOR YEE surmised by utilizing his position, UCE 4599 would be able to ship weapons directly to Africa.

UCE 4599 asked SENATOR YEE what the next steps were. SENATOR YEE replied by saying LIM would figure out if his SOS in the Philippines could provide the kinds of weapons UCE 4599 was looking to obtain. UCE 4599 reiterated his support for SENATOR YEE's campaign. UCE 4599 stressed the importance of completing the first weapons transaction. UCE 4599 told SENATOR YEE he was successful when his friends were successful. UCE 4599 reassured SENATOR YEE he would pay SENATOR YEE for his assistance in addition to the previously promised campaign donations. SENATOR YEE appreciated UCE 4599's gesture and to focus on the election first. UCE 4599 reiterated he would be picking the weapons up in the Philippines and shipping them back to the United States before ultimately sending them to North Africa. SENATOR YEE told UCE 4599 there are approximately 100 rifles currently available.

SENATOR YEE advised the Muslims in Mindanao had access to a lot of money and were being financed by Muammar Gaddafi before his death.

UCE 4599 asked to have a direct conversation with LIM. SENATOR YEE was hesitant and advised there wasn't anything that SENATOR YEE had told UCE 4599 that wasn't the truth. SENATOR YEE said LIM was a "gun lover" and had no moral arguments of selling weapons. SENATOR YEE reiterated he had been to Mindanao and had an opportunity to shoot some of the weapons discussed with UCE 4599. SENATOR YEE departed from the area. KEITH JACKSON and UCE 4599 had dinner at the restaurant within the hotel.

On March 11, 2014, UCE 4599 met with KEITH JACKSON, SENATOR YEE and LIM at a restaurant in San Francisco, California, to discuss an arms trafficking transaction. At the restaurant, SENATOR YEE introduced LIM to UCE 4599 and described him as highly trusted individual. UCE 4599 stressed the importance remaining safe during all aspects of the weapons trafficking deal. LIM told UCE 4599 the weapons could be shipped to Manila or to the Port of Cagayan de Oro, Philippines. LIM believed Manila would be the safest option. LIM said UCE 4599's contact in the Philippines would be LIM's nephew (not further identified). LIM continued by saying a Captain in the Philippine military (not further identified) would provide the weapons to LIM's nephew. LIM indicated he would prefer UCE 4599 put together a list of desired weapons. SENATOR YEE told UCE 4599 the weapons deal would not happen until after the California Secretary of State election. LIM and SENATOR YEE encouraged UCE 4599 to deal in smaller amounts of weapons to avoid unwanted attention in the Philippines. UCE 4599 asked about the major Muslim organizations in the Mindanao region of the Philippines. SENATOR YEE responded by saying "M.I.L.F." UCE 4599 understood M.I.L.F. to be an acronym for the MORO ISLAMIC LIBERATION FRONT. SENATOR YEE went on to explain there were several factions within the M.I.L.F. Regarding the M.I.L.F., LIM told UCE 4599 they are his friends but he does not personally associate with them.

UCE 4599 asked LIM about what specific weapons he had access to. LIM told UCE the Israeli made Tavor assault rifle was very common in the Philippines. LIM described the Tavor as being the equivalent of the "M16" assault rifle. UCE 4599 asked LIM if he had access to anything else "bigger." LIM responded by saying "All kinds of things, we just have to look for it." LIM was afraid to relay UCE 4599's request for weapons over the phone. UCE 4599 asked LIM if he would accompany UCE 4599 to the Philippines. LIM asked UCE 4599 if he was wanted by law enforcement. LIM and SENATOR YEE warned UCE 4599 to be careful in the Philippines. SENATOR YEE believed there was a high probability of being kidnapped in the Philippines.

UCE 4599 told LIM he would provide a list of desired weapons to KEITH JACKSON. LIM in turn, would hand deliver the letter to his nephew in the Philippines. SENATOR YEE said LIM would not go to the Philippines without SENATOR YEE and SENATOR YEE wasn't ready to go to the Philippines until November. SENATOR YEE explained "Once things start to move, it's going to attract attention. We just got to be extra-extra careful." While SENATOR YEE agreed with LIM's assessment of Manila being a safer location to pick up the weapons, SENATOR YEE said "We have more control in Cagayan de Oro than Manila. LIM asked if UCE 4599 could bring the money to the Philippines. UCE 4599 assured LIM it would not be a problem to transport the money to the Philippines. LIM advised UCE 4599 would meet with a head of a Muslim group.

UCE 4599 asked about a recent peace treaty signed between the Philippine government and the Muslim rebel groups. According to SENATOR YEE, the Philippine government was secretly funding some of the Muslim rebel groups in an effort to create a distraction so people would not focus on all the corruption within the Philippine government itself. SENATOR YEE explained there are several factions within the M.I.L.F. who did not agree with the peace treaty. LIM reiterated the weapons would be provided by the Philippine military. UCE 4599 asked for weapons that were light, mobile and devastating.

UCE 4599 would provide LIM with a list of desired weapons. If LIM could not hand deliver the list to the Philippines himself he would have an associate from the San Francisco Bay Area deliver the letter. SENATOR YEE advised he and LIM needed time to set up the infrastructure necessary to complete the weapons deal. SENATOR YEE didn't want LIM to get too involved because he was a United States citizen. UCE 4599 reiterated a previous statement made by SENATOR YEE on March 5, 2014, when SENATOR YEE said "I want to protect the entire enterprise." SENATOR YEE stated he wanted to build in several layers of protection to shield LIM and anyone else who may be involved with the weapons deal. SENATOR YEE was also worried about anybody detecting any "revenue streams" that may lead back to SENATOR YEE. UCE 4599 told SENATOR YEE he had a way to insulate any type of transaction associated with the weapons deal. LIM asked if UCE 4599 would have the capabilities to bring a ship over to the Philippines. UCE 4599 told LIM his family was in control of a large portion of the Port of Newark in New Jersey. LIM asked if UCE 4599 was in the Mafia. UCE 4599 confirmed he was associated with the Mafia in New Jersey.

On March 14, 2014, UCE 4599 met with SENATOR YEE, KEITH JACKSON and KEITH JACKSON's associate at a restaurant in San Francisco, California. During the meeting, SENATOR YEE and KEITH JACKSON openly discussed how they would break up a large sum of cash provided by UCE 4599 into legitimate campaign donations. UCE 4599 told SENATOR YEE he was prepared to give him $6,800 in cash and a list of weapons for him to give to LIM. YEE told UCE 4599 he would take the cash and have one of his children write out a check. Later in the evening, UCE 4599 walked with SENATOR YEE, and SENATOR YEE told UCE 4599 he would make a "Xerox" copy of the list and provide it to LIM. SENATOR YEE stated, LIM would in turn mail the list to his Philippine source of supply for weapons. **I believe that this demonstrates probable cause for a violation of Title 18, United States Code, Sections 371, 922(a)(1) and 922(l) by SENATOR YEE, KEITH JACKSON, and LIM.**

E. SCHEME TO DEFRAUD BY SENATOR YEE AND JACKSON

During a substantial portion of the time that the criminal activities described above were taking place, that is from approximately May 2011 through the present, SENATOR YEE and KEITH JACKSON were engaged in campaign fundraising activities for SENATOR YEE. These activities included agreements by SENATOR YEE and KEITH JACKSON that SENATOR YEE would engage in official acts requested by donor undercover agents, UCE 4599, UCE 4773, and UCE 4180 in exchange for campaign donations and money.

Background Pertaining to the Honest Services Fraud

As mentioned above, UCE 4599 and KEITH JACKSON met at a social gathering with CHOW on May 25, 2011. At this time, SENATOR YEE was serving as a State Senator for the California Eighth Senate District, which includes San Mateo County and part of San Francisco County. SENATOR YEE was also running for election in the San Francisco mayoral election to be held on November 8, 2011. KEITH JACKSON, who had purportedly known SENATOR YEE for many years, was raising money for SENATOR YEE's mayoral campaign, and solicited a $500 donation from UCE 4599 at the May 25, 2011 event. Five hundred dollars was the maximum allowed for a donation by an individual. KEITH JACKSON described his long-standing relationship with SENATOR YEE and how much money SENATOR YEE would control in the San Francisco budget once elected mayor. KEITH JACKSON explained that if UCE-4599 wanted to invest $5,000 in SENATOR YEE, UCE-4599 would get credit for it.

UCE 4599 declined to make the requested donation, but on several more occasions in mid-2011, KEITH JACKSON continued to solicit UCE-4599 for contributions to the campaign. Each time, UCE-4599 responded that he was not interested, and eventually told KEITH JACKSON that he had a business associate from the East Coast who might be interested in making a contribution.

On September 20, 2011, KEITH JACKSON invited UCE-4599 to a fundraiser for SENATOR YEE. UCE-4599 said he would check with UCE-4773. UCE-4773 was an FBI undercover agent who was posing as a business associate of UCE-4599 who lived and worked in Atlanta. The following day, UCE 4773 spoke with KEITH JACKSON over the telephone. KEITH JACKSON told UCE 4773 that he wanted him to come to a fundraiser that night so that KEITH JACKSON could introduce UCE 4773 to "a good friend of mine who's running for mayor, Senator YEE, LELAND YEE." UCE 4773 agreed to attend the event.

From the beginning of the investigation, and continuing throughout the investigation, UCE 4773 presented himself as a businessman engaged in real estate development who also represents a variety of investors and clients. UCE 4773 has represented himself as particularly being interested in expanding his business interests to California in general, and the San Francisco Bay Area in particular, and in making business and political contacts who could facilitate that expansion.

On September 21, 2011, UCE 4773 met KEITH JACKSON and SENATOR YEE in person at a fundraising event in San Francisco. In SENATOR YEE's presence, UCE-4773 wrote out a check for $500 as a campaign contribution.

Starting with their first meeting with UCE 4773, SENATOR YEE and KEITH JACKSON vigorously courted UCE 4773 as a potential campaign donor and fundraiser. On September 22, 2011, while located in Atlanta, UCE 4773 received a voicemail from SENATOR YEE stating that he "appreciate[d] the conversation and then hopefully, um, you know, there are things that uh, we can do to be of help uh, to you, and uh, but anyway just wanted to reach out and say thank you very, very much." On September 23, 2011, UCE 4773 received two calls from SENATOR YEE. During the first call, SENATOR YEE said he would like to discuss affordable housing with UCE 4773 – one of UCE 4773's purported business interests – "particularly" once SENATOR YEE was elected mayor. During the

second call, SENATOR YEE said that he could not talk policy at the same time he asked for money. At this point, SENATOR YEE asked UCE 4773 to raise $5,000 to $10,000 for SENATOR YEE's campaign. Senator YEE acknowledged the $500 individual donation limit during the conversation.

Over the course of their relationship and dealings for the remainder of the mayoral election, UCE 4773 made it clear to both KEITH JACKSON and SENATOR YEE that he was prepared to assist them, but expected consideration in exchange in terms of furthering his own business interests.

In response to SENATOR YEE's and KEITH JACKSON's requests for campaign donations, on October 11, 2011, UCE 4773 hand-delivered to KEITH JACKSON a $5,000 personal check made payable to "JACKSON CONSULTANCY." In response to UCE 4773's concerns that SENATOR YEE would know that UCE 4773 had made the contribution and would get credit for it, KEITH JACKSON said that SENATOR YEE would be aware because JACKSON planned to tell him.

On October 13, 2011, SENATOR YEE and KEITH JACKSON and others attended a meet and greet event attended by UCE 4773 and ten other undercover FBI agents. UCE 4773 arranged for each of the ten undercover agents to make a donation to SENATOR YEE of $500 each, thereby raising $5,000 for SENATOR YEE's campaign.

The following day, October 14, 2011, KEITH JACKSON called UCE 4773 and they discussed additional donations to SENATOR YEE's mayoral campaign. JACKSON hinted at wanting UCE 4773 to contribute additional funds. UCE 4773 said he was interested in donating more money, but he would not do so without knowing what he would get in return.

Later in the evening of October 14, 2011, following a telephonic invitation from SENATOR YEE, UCE 4773 met with SENATOR YEE at the coffee shop in the Marriot Marquis hotel in San Francisco. UCE 4773 discussed the fact that he had already provided $11,000 to the campaign, and told

SENATOR YEE, "it's too much money ... not to get something." UCE 4773 was not necessarily seeking specifics from SENATOR YEE at this time, but was seeking assurance that consideration would be forthcoming. SENATOR YEE immediately responded: "Right, right, right." SENATOR YEE told UCE 4773 about all the money he had raised over the years in connection with his career in the state Senate and his positions in the Senate: "...it gave me a lot of cachet in terms of being able to raise money, and also to be helpful when, you know, it was the right thing to do." At one point in the conversation, SENATOR YEE added that he had a lot of friends in Sacramento; he understood there was a lot that UCE 4773 wanted to do both at the state and local level; and said "there's tremendous opportunity in local levels, ... because whoever's gonna be the mayor controls everything."

During this conversation, UCE 4773 mentioned "the five" raised [through the "investors"] at the meet-and-greet the night before. UCE 4773 then referred to "the five that I gave KEITH [JACKSON], the separate five," and referred to worries raised by an article he saw in the newspaper about people getting caught donating over the $500 limit to another mayoral candidate. UCE-4773 expressed concern about the risk he was running in being exposed and investigated. SENATOR YEE responded, "[Y]ou're right ... we gotta be careful." He added, "... you ought to be careful too." SENATOR YEE then said, "we've gotta get the money, but, you know, to the extent that you could find a way to do it, ... you know I would appreciate that." When UCE-4773 continued to express concern about putting a large sum into the campaign, SENATOR YEE said that the campaign was going to get audited "because we took public financing." He said that would include looking at where the money comes from, "and you just gotta be careful about that." SENATOR YEE added, "I would simply say that as long as you cover your tracks ... you're fine ... [b]ut if you don't think you can do that, don't do it."

When UCE 4773 asked if there was some way that he could contribute money "outside the campaign," and not have to be worried, SENATOR YEE said that UCE 4773 could contribute unlimited

sums to a committee supporting a ballot measure for school funding that SENATOR YEE also supported. SENATOR YEE explained that the ads for the measure would feature SENATOR YEE in a positive piece supporting schools and education. At the end of the conversation, SENATOR YEE said that he wanted UCE 4773 to be comfortable with whatever he did, because for SENATOR YEE, "this is about a long term relationship." SENATOR YEE then mentioned that if he won the mayoral position, "we control 6.8 billion man, shit." SENATOR YEE told UCE 4773 that he had no interest in making money for himself, but was happy to have his friends make money. UCE 4773 recounted that "I'm at 11,000 dollars," and said that there was no problem getting the money, he just did not want to get caught doing something stupid. SENATOR YEE responded, "[r]ight, and, like I said, you know, you get ten thousand into the campaign ... and then the other ten, you know, you can write it and dump it in the ballot measure, I don't care."

On several more occasions before the November 8, 2011 election, SENATOR YEE and KEITH JACKSON asked UCE 4773 for more money. UCE 4773 did not make any additional donations. Senator YEE lost the mayoral election on November 8, 2011.

Bribe Involving Well Tech

During a meeting with SENATOR YEE and KEITH JACKSON on January 18, 2012, SENATOR YEE told UCE 4773 that he was considering running for Secretary of State in the November 2014 election. SENATOR YEE said that he could not get started on fundraising for the Secretary of State election until he retired the $70,000 debt from the San Francisco mayoral campaign. SENATOR YEE asked UCE 4773 to raise $10,000 in order to retire the mayoral debt and also asked UCE 4773 to also donate to the Secretary of State campaign. UCE 4773 did not make any commitment.

On April 7, 2012, UCE 4773 met with SENATOR YEE and KEITH JACKSON at the Starbucks located inside the Marriott Marquis hotel in San Francisco. They discussed UCE 4773's business interests, including a software consulting business client. UCE 4773 said he wanted to expand the client's business into California.

On April 27, 2012, in response to continuing requests from KEITH JACKSON for donations to retire SENATOR YEE's mayoral campaign debt, UCE 4773 sent a personal check to KEITH JACKSON via Federal Express. The check was for $5,000 and made payable to KEITH JACKSON.

On June 2, 2012, UCE 4773 spoke with KEITH JACKSON over the phone. JACKSON told UCE 4773 that SENATOR YEE would like to meet with UCE 4773 the next time UCE 4773 was in town. According to JACKSON, SENATOR YEE's attitude was "whatever [UCE-4773] need[s] from him ...he's open to help as much as he can." The two discussed UCE 4773's software consulting company client, Well Tech, and JACKSON suggested using SENATOR YEE's contacts in San Mateo County to assist Well Tech. Well Tech was the name of the software consulting company client that UCE 4773 was seeking to expand to the San Francisco Bay Area. JACKSON stated, "just consider that an easy ask for Leland to kind of, you know, help identify, you know, especially in San Mateo County, where there's plenty of opportunities there..."

On June 6, 2012, UCE 4773 spoke on the phone again with KEITH JACKSON. JACKSON advised that SENATOR YEE's mayoral campaign debt was down to around $31,000. JACKSON said that SENATOR YEE needed UCE 4773's help and wanted help by June 22, 2012. JACKSON stated that whatever UCE 4773 could do to help clear up the debt, "it'll be greatly, greatly appreciated." UCE 4773 responded that he knew JACKSON could not discuss the subject on the phone, but UCE 4773 was going to need something very specific before giving more money. UCE 4773 added that he would need to meet and talk to SENATOR YEE directly. JACKSON asked UCE-4773 to call SENATOR YEE.

UCE 4773 and KEITH JACKSON spoke again by phone on June 19, 2012, at which time JACKSON told UCE 4773 that SENATOR YEE needed $40,000 and that SENATOR YEE's deadline to clear his debt was June 30. JACKSON asked UCE 4773 for $10,000. When UCE4773 asked what SENATOR YEE's response was to UCE 4773 saying he would need to get something out of it, JACKSON said SENATOR YEE was fine with that.

On June 26, 2012, UCE 4773, a Confidential Human Source (CHS #12), and UCE-4212 met with SENATOR YEE, KEITH JACKSON, and others at an office in Sacramento, California. UCE 4212 was an FBI undercover agent posing as "SONJA SCHMIDT." CHS #12 was posing as an individual who runs a software consulting business. CHS #12 told SENATOR YEE that her business does information technology (IT) and management consulting in the area of business systems support and advised that her company has contracts with federal agencies. UCE 4773 explained to SENATOR YEE that he and his investors were providing funding to assist CHS #12 in expanding and competing for contracts in the state of California. UCE 4773 explained that UCE 4212 has a strong business background and would be helping CHS #12as a business development manager in California. UCE 4773 told SENATOR YEE that he was seeking to position CHS #12 to compete for contracts throughout the state of California and the City of San Francisco. UCE 4773 said that anyone could compete for contracts, but CHS #12 was "still going to need [to] access the relationships." SENATOR YEE discussed potential opportunities in San Mateo County and in the state of California, noting that certain state-wide computer systems, such as that of the courts, needed improvement. SENATOR YEE said that there were "two elements of Secretary of State that may be of interest to you." He explained that one was business development and another is in elections, where the computer system was antiquated.

CHS #12 and UCE-4212 left the meeting and UCE 4773 continued to meet with SENATOR YEE and the others. UCE 4773 told SENATOR YEE that he and his investors planned to put $500,000

into CHS #12's company over the next five years. He added that he wanted to "identify opportunities for [CHS #12] to grow." In response to that statement, SENATOR YEE said, "Okay, let, let me just tell you my situation. My situation is that um, you know, we, we want to raise 40,000 and we've just been having a dog of a time. ... [y]ou know I know you've helped with 5,000 and so on. You know, what we're looking at is if you can help with another 10." SENATOR YEE said, "we were hoping to close by the end of the month." SENATOR YEE added if he did not close the mayoral debt by the end of the month, he was going to have to delay the announcement for Secretary of State. At the close of the meeting, SENATOR YEE told UCE-4773, "if you could be helpful, it would be really good."

KEITH JACKSON telephoned UCE 4773 on July 2, 2012 and told him that SENATOR YEE was setting up meetings for Well Tech with a state public official involved in technology and with some individuals at the local level involved in transportation. JACKSON told UCE 4773 that SENATOR YEE "is moving forward; he gets it," and that SENATOR YEE said he will "make some things happen."

On September 4, 2012, UCE 4773 met with SENATOR YEE and KEITH JACKSON in the cafeteria in the State Building at 455 Golden Gate Avenue in San Francisco. When UCE 4773 asked SENATOR YEE if he had announced for Secretary of State yet, SENATOR YEE replied "we're 32 out now. $32,000 out ... from paying off the debt." SENATOR YEE then added, "[S]o, um, if you could do another 10, that would be good." UCE 4773 said that he had a meeting the next day with the state health department. UCE 4773 explained that he was meeting with the person in procurement who was "going to help [CHS #12] set up with at least the lead on a couple of contracts." UCE 4773 added, "I know we're gonna need a phone call or two on [CHS #12]'s behalf. I'll give you a call, um, to work out the details." SENATOR YEE responded: "Just let me know." SENATOR YEE also added that he planned to set up a meeting with UCE-4773 and [CHS #12] with the state-level technology person and mentioned that he, Senator YEE, had already met with this individual. UCE 4773 said that at the

meeting with the health department the next day, UCE 4773 would be pushing Well Tech and anticipated moving fast with the health department. UCE 4773 told SENATOR YEE, "[i]f you can do that, then 10 is no problem at all. I don't have a problem with that at all." SENATOR YEE responded by saying, "[s]o just let me know who you guys are meeting with and, uh, you know, uh, get that information to me so I'll make the call right away." UCE 4773 said, "[s]ounds good." A short time later in the conversation, UCE 4773 said he would call SENATOR YEE the next day after he found out to whom calls would need to be made. He then asked how soon SENATOR YEE needed "the 10," and SENATOR YEE responded "as soon as possible."

On September 10, 2012, SENATOR YEE left a voicemail for UCE 4773 asking for the name of the person at the California Department of Health whom UCE 4773 needed SENATOR YEE to call.

On September 19, 2012, UCE 4773 spoke again with SENATOR YEE by telephone and said that Well Tech was looking to do business with the state Health Department and UCE 4773 needed a letter from SENATOR YEE talking about the efforts Well Tech had been making in the state. SENATOR YEE responded, "why don't you do this? Why don't you draft something for me? And then what I will do, is, is I will play with uh some of the words so that I can [unintelligible]. And what I'll do is, in a letter, I'll indicate the fact that, uh, you know, I, I met with whatever that gal's name was, and I was really impressed with her credentials, and the potential of her helping out individuals in my district, San Mateo County. And encouraging her to pursue ideas in the county, but in California, and try and help streamline the process and save us money."

On September 20, 2012, UCE 4773 sent a proposed draft letter via e-mail to the e-mail account provided by SENATOR YEE. On the same date, UCE 4773 called SENATOR YEE and they discussed the letter. SENATOR YEE stated he would print the letter out, get it to his staff, and then get it back to UCE 4773 sometime next week with revisions.

When KEITH JACKSON and UCE 4773 spoke on September 24, 2012, JACKSON told UCE 4773 that SENATOR YEE was all over him to clean up the debt. UCE 4773 said later in the conversation that if SENATOR YEE could get him the letter, UCE 4773 would "hook" JACKSON up. JACKSON explained that SENATOR YEE wanted to move forward with UCE 4773, but he also wanted to be safe. UCE 4773 said he would not put any more money out there unless he was getting something. JACKSON agreed, stating, "I understand that and I think he understands that too."

UCE 4773 and KEITH JACKSON spoke by phone again on September 26, 2012. JACKSON said, "I just ... you know, the Senator, I talked to him yesterday, uh, in regards to the letter. So, what he thought was that, you know, keep the letter as is, and whatever phone calls he needs to make ...". JACKSON stated, "'[c]ause he [Senator YEE] said he's comfortable making calls, whatever he needs to do. Uh, he said, it's just the letter thing is once you put it in writing, you just he, he, he didn't want it to seem like he's telling somebody, another state employee, that he just, they have to give you guys the contract. Just in case somebody else got upset about that, then it's public information .... And so he said, phone calls, whatever he needs to do, he, he'll, he'll do that. And he also wanted me to tell you that, he, he said he told me to tell you that, whatever, whatever you want, [UCE 4773], you got it. And so he just, he wants you to feel comfortable with that. You know, he just, he sees this as a long-term relationship and he don't, he don't you know, he don't want to fuck things up." UCE 4773 was located in Georgia, and JACKSON was located in San Francisco, California, during this call. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and JACKSON.**

UCE-4773 and SENATOR YEE spoke by phone on September 27, 2012, at which time SENATOR YEE again asked UCE 4773 for money, and asked for it sooner rather than later. On

October 1, 2012, KEITH JACKSON called UCE 4773 and told UCE 4773 that SENATOR YEE was "blowing me up every day" with telephone calls and was on JACKSON's "ass" to get more money.

On October 18, 2012, UCE 4773 telephoned SENATOR YEE from Georgia and told SENATOR YEE that the contact at the California Department of Public Health who was helping UCE 4773 was named "RAVI." SENATOR YEE was located in San Francisco, California, during this call. UCE 4773 told SENATOR YEE that RAVI worked on the administration of grants, including a grant involving immunization services, and this was a great opportunity for Well Tech. UCE 4773 told SENATOR YEE that Well Tech does not have a strong presence in California and one of the things that would help would be for SENATOR YEE to call and vouch for SENATOR YEE's relationship with CHS #12, SONJA [UCE 4212], and Well Tech, and state what SENATOR YEE thought they are capable of accomplishing. SENATOR YEE agreed and asked that UCE 4773 text him the name of the person to whom he would be speaking. UCE 4773 said that all he was asking for today was that SENATOR YEE participate in a conference call. UCE 4773 said he would set up the conference call and introduce the senator. Senator YEE agreed. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and JACKSON.**

Shortly thereafter on October 18, 2012, a conference call took place between SENATOR YEE, UCE 4773, and UCE 4138. UCE 4138 was an FBI agent acting in an undercover capacity and posing as RAVI. UCE 4138 was located in Hawaii; UCE 4773 was located in Georgia; and SENATOR YEE was located in San Francisco, California, during this call. UCE 4138 said that he was a staff services manager with the Department of Public Health in Richmond, California. SENATOR YEE told "RAVI" that he had had an opportunity to meet with [CHS #12] and he understood that one of the challenges in California is dealing with technology. SENATOR YEE said that when UCE 4773 introduced him to [CHS #12] and her company's abilities, that was pretty intriguing to SENATOR YEE. SENATOR YEE

told RAVI that "if we can try and look at [CHS#12's] capacity in her company and whatnot, I think that would be a tremendous boon for the state of California." SENATOR YEE said that he understood that RAVI was working with Well Tech on an immunization program, and said, "we should be supportive of that, uh, and hopefully it will be a fruitful, uh, relationship from them and California, and maybe there are other, uh, projects that we can engage them in." RAVI responded that this was just the question he wanted to ask and he was glad to hear that SENATOR YEE has a positive experience on this issue. SENATOR YEE said that he thought there were many other projects that [CHS#12] and her folks could really be working on, "so let's just see how that goes." SENATOR YEE thanked RAVI for his time. While RAVI and UCE 4773 were still on the line, SENATOR YEE asked UCE 4773 if UCE 4773 was okay. UCE 4773 said that he was and would call the senator back. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and JACKSON.**

After the call with Ravi ended, UCE 4773 called SENATOR YEE and thanked him. UCE 4773 stated that Ravi had been trying to help them but that it had been moving slowly and Ravi had told him that anything to move it along would help. When UCE 4773 asked SENATOR YEE how everything else was going, SENATOR YEE said he was still trying to take care of the debt and it was taking a lot of time. SENATOR YEE then added that anything UCE 4773 could do would help with that.

UCE 4773 did not provide a campaign donation to SENATOR YEE immediately after the October 18, 2012 phone call. Between November 14, 2012 and November 16, 2012, SENATOR YEE and KEITH JACKSON spoke on several occasions. During these conversations, SENATOR YEE complained about UCE 4773 asking for favors, but not giving anything in return. In a phone conversation between SENATOR YEE and KEITH JACKSON on November 14, 2012, JACKSON mentioned that he had just spoken to UCE 4773 and SENATOR YEE responded, "oh, good luck on that

one then, shit." KEITH JACKSON explained that the letter for Well Tech was important to UCE 4773 and asked SENATOR YEE for the letter, as a favor. SENATOR YEE responded that he talked to the guy [from the Public Health Department] and we're "still not fine. Now he wants the letter and we're still not going to be fine. There's always going to be something else." SENATOR YEE said that at this point, they would just raise the money without UCE 4773. When KEITH JACKSON pressed SENATOR YEE for the letter, SENATOR YEE asked what guarantees they had that UCE 4773 was not going to screw them again. SENATOR YEE went on to say, "but this guy is just jerking us around, man. Two months and [unintelligible] nothing. And then later he says okay, talk to the guy ... I already talked to the guy and then now, uh, you know, then the letter. When it is going to end?" KEITH JACKSON continued to press for the letter, and SENATOR YEE said he would work on it.

During a telephone conversation between SENATOR YEE and KEITH JACKSON on November 16, 2012, JACKSON asked about the letter and SENATOR YEE said it had to go through the "rules people." JACKSON said if they could just get the letter, then UCE 4773 would do what he needs to do. SENATOR YEE responded, "[y]eah, well, you just tell [UCE 4773] to just do it. Come on, [UCE 4773]." SENATOR YEE complained that he was busy and "there's got to be some trust around here man, shit." He compared it to dating a woman, saying that you do this and I'll do that. SENATOR YEE wondered whether UCE 4773 understood that if SENATOR YEE did not succeed, then UCE 4773 would not have access. SENATOR YEE then referred to the eight years he would be in charge if he becomes Secretary of State.

During a phone conversation with KEITH JACKSON on November 16, 2012, UCE 4773 that he could not transfer enough money so he would have UCE 4599 give the money to JACKSON for SENATOR YEE.

On November 19, 2012, KEITH JACKSON met with UCE 4599 at the Waterbar restaurant in San Francisco. UCE 4599 paid JACKSON $10,000 cash on behalf of UCE 4773. JACKSON stated that the money would be helpful in retiring SENATOR YEE's campaign debt. UCE 4599 told JACKSON that UCE 4773 called him and asked him to do this favor. UCE 4599 said that UCE 4773 wanted to remind JACKSON that he was still waiting on "some letter." JACKSON responded, "[y]eah I got it." JACKSON reassured UCE 4599 that he had spoken with SENATOR YEE several times over the previous days and the letter was forthcoming.

On November 23, 2012, SENATOR YEE spoke to an aide who was keeping track of and accounting for campaign donations. SENATOR YEE verified that the aide had received the $10,000 from [UCE 4773].

On January 13, 2013, KEITH JACKSON sent via e-mail to UCE 4773 the final version of the letter on behalf of Well Tech from SENATOR YEE. JACKSON's e-mail message to UCE 4773 stated: "Hi [UCE 4773], Please find the letter attached from the Senator and feel free to contact me for any questions or comments. Thanks, Keith" The letter attached to the e-mail message was on the California State Senate letterhead of Senator Leland Y. Yee, Ph.D., Eighth Senate District; dated January 11, 2013; and addressed to Sonja Schmidt at Well Tech. The letter read as follows:

Dear Ms. Schmidt,

I was pleased to meet you and your associates again. I am also excited that you have located your business in California.

As I said in our meeting, your technology expertise is most needed in the State. Your ability to have computer systems communicate across agencies, departments, and jurisdictions increases the utility of information.

As a small and woman owned business, I encourage you to bring your skills to address the various challenges in California by competing for various government contracts.

I wish you the best. Please call if I can be of further assistance.

Sincerely,

Senator Leland Y. Yee, Ph.D.

California State Senate

A handwritten signature appeared below the word "Sincerely."

The Bribe Involving a State Senate Proclamation for the Chee Kung Tong

At the November 19, 2012 meeting between UCE 4599 and KEITH JACKSON, UCE 4599 not only paid the $10,000 campaign donation requested by SENATOR YEE and KEITH JACKSON of UCE 4773. During the meeting, UCE 4599 raised an issue relating to Raymond "Shrimpboy" CHOW and an ankle monitoring device that CHOW was wearing. UCE 4599 said he wanted to help CHOW have the monitoring device removed, and asked KEITH JACKSON if he knew anyone in Sacramento who could assist. KEITH JACKSON said he thought SENATOR YEE could make a call on CHOW's behalf, but CHOW would also need a good attorney. KEITH JACKSON told UCE 4599 that the $10,000 he just provided would be helpful in paying off SENATOR YEE's campaign debt. KEITH JACKSON said he had asked if UCE 4773 could assist in paying off the remaining $5,000 in debt, but UCE 4773 declined. UCE 4599 told KEITH JACKSON that he – UCE 4599 -- would be willing to assist SENATOR YEE in retiring the remainder of his debt if Senator YEE was willing to assist CHOW. JACKSON said he would discuss it with SENATOR YEE.

SENATOR YEE and KEITH JACKSON spoke by telephone later the same day. JACKSON told SENATOR YEE that "our friend Raymond" needed some help. They agreed to talk the next day.

The following day, November 20, 2012, KEITH JACKSON and SENATOR YEE spoke by telephone again. SENATOR YEE told JACKSON that on the following Monday, "we're going to put out a statement saying that we're going to run, we're going to open the account on Monday, and, um, and we're gonna start raising money for the Secretary of State. And your guys man, shit, they better

hurry up because we met with that technology guy. Shit." JACKSON advised SENATOR YEE that he received the money the previous day.

KEITH JACKSON told SENATOR YEE that he had a guy who wanted to help out CHOW by having SENATOR YEE put a call in for him. SENATOR YEE asked who JACKSON's guy was and JACKSON responded that it was a business partner of UCE 4773, [UCE 4599]. JACKSON stated that somebody, maybe the FBI, had CHOW "by the balls." JACKSON then asked SENATOR YEE if he could talk on his private line, and SENATOR YEE called JACKSON back on one of his home telephone lines. JACKSON advised SENATOR YEE that UCE 4599 would clear up the rest of the debt, but wanted to know if SENATOR YEE could put in a good word for CHOW somewhere down the line. SENATOR YEE expressed concern because CHOW wanted to publicize and glamorize his life through a book and movie, and added, "[y]ou know, some people still think that he killed that Allen Leung guy." In a follow-up telephone conversation between SENATOR YEE and JACKSON later the same day, SENATOR YEE said that CHOW is a gangster, part of a Tong, and should lay low. SENATOR YEE finally said, "shit, as much as I want that five thousand, I can't do that man. Shit. Fuck. Shit."

During a phone conversation on December 3, 2012, KEITH JACKSON spoke to UCE 4599 about the prospect of SENATOR YEE helping CHOW. JACKSON told UCE 4599 that SENATOR YEE believed CHOW should "just chill" right now. Then, if things calm down for a while, SENATOR YEE would "be ready to step in."

On December 7, 2012, KEITH JACKSON met with UCE 4599 in San Francisco. JACKSON stated that he had a conversation with SENATOR YEE in which JACKSON described UCE 4599 as a "good guy" and advised SENATOR YEE that he should meet UCE 4599. JACKSON said that he hoped to quickly raise $50,000 for SENATOR YEE's Secretary of State campaign, and wanted UCE 4599's assistance. Later in the conversation, while discussing CHOW, JACKSON apologized for SENATOR YEE being unable to assist CHOW pursuant to UCE 4599's request. JACKSON stated, "[h]e wants to

help. Leland, uh, he tries to be so conservative sometimes." UCE 4599 told JACKSON that he understood the request may be too risky for SENATOR YEE.

On January 22, 2013, UCE 4599, SENATOR YEE, and KEITH JACKSON had drinks at the Waterbar restaurant in San Francisco. This was SENATOR YEE's first introduction to UCE 4599. UCE 4599 described himself as being in private wealth management. SENATOR YEE asked UCE 4599 how he knew CHOW and UCE 4599 answered that he had met CHOW through a close associate in New York and that his organization was thinking about bankrolling CHOW's book and movie deals. SENATOR YEE stated that CHOW needed to stay low-key. UCE 4599 told SENATOR YEE that he wanted to get a proclamation from SENATOR YEE's office acknowledging the CHEE KUNG TONG's 165th anniversary. SENATOR YEE said he could do that for the association. He added that he was concerned CHOW would hold a press conference about it. JACKSON assured SENATOR YEE that CHOW would not do that. SENATOR YEE stated "what we have to do on our side is be careful ... you know, because uhm, this guy [CHOW] told on his friends." [This was likely a reference to an earlier federal prosecution of CHOW during which CHOW cooperated with the authorities in exchange for a reduced sentence]. After SENATOR YEE left the meeting, JACKSON told UCE 4599 that SENATOR YEE "wants to be safe." UCE 4599 told JACKSON if SENATOR YEE provided the proclamation on behalf of the Tong, UCE 4599 would write a check.

On February 12, 2013, SENATOR YEE and KEITH JACKSON spoke on the telephone. SENATOR YEE instructed JACKSON to "start collecting the checks" from UCE 4599 "now."

On February 14, 2013, KEITH JACKSON called UCE 4599 and told him that SENATOR YEE was going to do the proclamation and bring it to the CHEE KUNG TONG celebration dinner which was being held on March 29, 2013. UCE 4599 responded, "[y]ou told him I'll give him a check then, right? Or shortly thereafter?" JACKSON stated "yeah, whatever, we'll do something afterwards. I just wanta try to do a fundraiser for him."

SENATOR YEE and KEITH JACKSON spoke on the morning of February 26, 2013 and discussed the fact that SENATOR YEE's competitor in the Secretary of State race was ahead in fundraising. JACKSON discussed UCE-4599 having "three guys that would do $6,800." SENATOR YEE replied, "[s]o if he if he can get, if he can get ten man, that would be 60,000, that would be great, that would really help us." When JACKSON asked what Senator YEE meant, SENATOR YEE clarified that he would like UCE 4599 to get "ten individuals at 6,800 each."

Later the same day, KEITH JACKSON spoke to UCE 4599 on the telephone. UCE 4599 asked, "[g]ot that cat up in Sacramento working for me or what? Is he going to do that thing?" JACKSON responded, "[g]ot the proclamation, put it in a nice little glass kind of thing. He [SENATOR YEE] won't be there because he has a fundraiser in LA, but he's going to send it [unintelligible] with [a staff member] and [he'll/she'll] present it. Is that cool?" UCE 4599 responded, "[h]ey man, that's all right with me."

Later on February 26, 2013, KEITH JACKSON and SENATOR YEE spoke again and SENATOR YEE said, "[o]n Shrimpboy ... [y]ou just got to be careful, [UCE-4599] supports him. That's okay, I don't care. But, you know, let's not get too close, okay?" JACKSON responded, "[y]eah, just ah, you do a proclamation, right?" SENATOR YEE said, "No, we're going to do a proclamation, don't tell anybody, but we're going to do a proclamation not to Shrimpboy, but to the organization." JACKSON said, "[y]eah, that's what he wants." SENATOR YEE then said, "No, no, but, but, I mean, in general, because he's still hot stuff. I just talked to some of the you know people who, you know, in the families, and, you know, he's still hot stuff. So we just gotta be careful, man."

On March 6, 2013, KEITH JACKSON spoke on the phone with CHOW. CHOW said, "I heard Leland is going to be busy. He cannot come to my function." JACKSON replied, "Yeah, I know. He's going to be out of town. He's going to send his staff. He's going to give a plaque to the organization." CHOW said, "Oh, ok." JACKSON added, "Yeah. You don't want it to you, right? You don't want it

to you. You just want it to the organization right?" CHOW responded, "Yeah, to my organization and also to my members from New York."

On March 29, 2013, one of SENATOR YEE's staff members attended the CHEE KUNG TONG anniversary celebration dinner at the New Asia Restaurant in Chinatown and presented a framed proclamation on California State Senate letterhead. In presenting the proclamation, the staff member said that he/she was officially presenting the proclamation from SENATOR YEE. CHOW was one of the attendees at the dinner.

During April 2013, SENATOR YEE and KEITH JACKSON continued to have telephone discussions about the money they expected from UCE 4599. On April 30, 2013, JACKSON and SENATOR YEE discussed to whom UCE 4599 should make the check payable. SENATOR YEE said it should be made payable to "Leland Yee Secretary of State."

On April 30, 2013, UCE 4599 and KEITH JACKSON exchanged text messages in order to coordinate a meeting so that UCE 4599 could deliver the check. The following day, on May 1, 2013, JACKSON texted UCE 4599 and advised him to make the check out to "Leland Yee. For Secretary of State." JACKSON sent and received these text messages via his T-Mobile account. T-Mobile has confirmed that any such text messages would have been routed electronically through the state of Washington. JACKSON was located in San Francisco when he sent the May 1, 2013 text. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and JACKSON.**

On May 6, 2013, UCE 4599 met with KEITH JACKSON and his son, BRANDON JACKSON. During the meeting, UCE 4599, KEITH JACKSON, and BRANDON JACKSON discussed a weapons deal. In addition, UCE 4599 delivered a check to JACKSON for $5,000 made payable to "Leland Yee Secretary of State." UCE 4599 told JACKSON he believed CHOW was happy with the presentation of the proclamation to the CHEE KUNG TONG.

On May 9, 2013, KEITH JACKSON called UCE 4599 and then handed the phone to SENATOR YEE. SENATOR YEE thanked UCE 4599 for the donation, and said they should sit down together and keep the relationship. UCE 4599 told SENATORYEE that he was welcome and added that if he could do anything else for SENATOR YEE, SENATOR YEE should let him know. SENATOR YEE responded that he wanted to make sure UCE 4599 was comfortable working with JACKSON. UCE 4599 said that he was.

On June 6, 2013, UCE 4599 had dinner with KEITH JACKSON and SENATOR YEE. During a conversation about CHOW and CHOW's desire to make a movie and/or book about his life, UCE 4599 told SENATOR YEE that he appreciated the proclamation, saying it was a "nice gesture." The following day, JACKSON and SENATOR YEE spoke on the telephone about UCE 4599 and why he wanted to stay invisible. SENATOR YEE joked that UCE 4599 must have drug money. JACKSON told SENATOR YEE that UCE 4599 wanted to do more, "he wants to help you." SENATOR YEE responded, "yeah, man, yeah, so you should just tell him to start getting us the money man, that's all."

During a telephone conversation with KEITH JACKSON on July 4, 2013, SENATOR YEE asked if UCE 4599 had given JACKSON "more stuff yet." SENATOR YEE then clarified: "I mean checks and so on?"

On July 11, 2013, UCE 4599 gave KEITH JACKSON a check for $1,800 made payable to "Leland Yee for Secretary of State." That same day, JACKSON told SENATOR YEE about UCE 4599's check.

Bribe Involving Medical Marijuana Legislation

During the course of the investigation, another undercover FBI agent, UCE 4180 was introduced to SENATOR YEE and KEITH JACKSON. UCE 4180 represented himself as a businessman involved in the medical marijuana business in Arizona. He told SENATOR YEE and JACKSON that he was seeking to expand to California and was particularly interested in statewide legislation in California that

would regularize the industry and contain provisions that would be favorable to his business model. UCE 4180 told SENATOR YEE and JACKSON that he was prepared to make contributions to SENATOR YEE's Secretary of State campaign in exchange for SENATOR YEE introducing UCE 4180 to state legislators who had a role in medical marijuana legislation and for SENATOR YEE's support of UCE-4180's interests.

On March 14, 2013, an FBI confidential human source (CHS#11) who was posing as a business associate of UCE 4773, introduced UCE 4180 to SENATOR YEE at a face-to-face meeting in a Starbucks at the Marriott Marquis hotel in San Francisco. UCE 4180 told SENATOR YEE and JACKSON, who was also present, that he wanted to be the "Anheuser-Busch" of medical marijuana. UCE 4180 said he wanted to be able to come to California and operate legally under legislation allowing him to do so. SENATOR YEE said that he knew Asian farmers who grew marijuana and Vietnamese individuals who sold to dispensaries. SENATOR YEE said that he was pessimistic that any legislation would happen this year. However, if it did, it would be by ballot initiative, and as Secretary of State, he could help with ballot initiatives. CHS#11 mentioned that JACKSON asked him about retiring some of SENATOR YEE's debt. UCE 4180 stated that he would like to see something done about the debt so that SENATOR YEE could focus his efforts on UCE 4180's concerns.

In a follow-up call later the same day, KEITH JACKSON told CHS #11 that if UCE 4180 wanted to help retire SENATOR YEE's mayoral campaign debt, CHS #11 could put money in JACKSON's account, and then JACKSON would take care of it. JACKSON said that SENATOR YEE would know the money came from UCE 4180.

On March 20, 2013, UCE 4180 arranged for a cash deposit of $2,500 to KEITH JACKSON's bank account. That same day, CHS #11 talked with JACKSON and JACKSON indicated he knew the money was from UCE 4180 to help clear Senator YEE's mayoral debt and have Senator YEE focus on UCE-4180's needs.

On April 6, 2013, KEITH JACKSON, UCE 4180, and CHS #11 met at a fundraiser for SENATOR YEE at a banquet hall in San Francisco. JACKSON acknowledged UCE 4180's payment and stated "he greatly appreciates it," referring to SENATOR YEE. UCE 4180 stated that "the state is going to have to take a stand" regarding medicinal marijuana legislation, to which JACKSON replied "and he's willing to play the game," again referring to SENATOR YEE. UCE 4180 responded that that was the statement he was looking for, and it meant "we can get into business together."

As people left the fundraiser, SENATOR YEE joined the group and ushered them to a table at the end of the banquet hall. UCE 4180 explained to SENATOR EE his long-term operation plan and his interest in state legislation. SENATOR YEE stated that since their last meeting, he met with his friend who is the executive director of a marijuana dispensary and learned all about how it works. SENATOR YEE told UCE-4180 that a state legislator, hereafter referred to as State Senator 1, was in an oversight position on the issue of medical marijuana legislations. During this meeting, SENATOR YEE said that he did not want to gain personally or financially from any venture with UCE 4180, but rather he was in it to help his friends. At one point, UCE 4180 asked SENATOR YEE, "how do we get you elected?" SENATOR YEE responded, "I'm going to leave that to what you think you can handle. But whatever fundraising you can do, I would appreciate it." After SENATOR YEE left the conversation, UCE 4180 asked what he gets for his money, and JACKSON responded "access to him," referring to SENATOR YEE. CHS #11 told UCE 4180 that he had been asked for $50,000 for SENATOR YEE's campaign. JACKSON told UCE 4180 that he needed somebody on the state level who can push the legislation, someone "who is not afraid to push it."

On April 8, 2013, KEITH JACKSON spoke with CHS #11 and told him that SENATOR YEE thought UCE 4180 was a great guy and SENATOR YEE was ready to move forward. JACKSON stated he was in SENATOR YEE's office at the time. Later in the day, during another conversation between JACKSON and CHS #11, JACKSON stated that SENATOR YEE wanted to see if UCE 4180 could

raise $20,000 for the Secretary of State campaign. JACKSON said UCE 4180 would have to "float" the money through JACKSON and then JACKSON would "do what I do."

On April 24, 2013, UCE 4180 spoke with KEITH JACKSON and asked if JACKSON had a bank account where he could deposit a small donation to SENATOR YEE to show "good faith." JACKSON stated he would text an account number and also assured UCE 4180 that his name would never be associated with Senator YEE's campaign. UCE-4180 asked if he made a large donation, "what are the deliverables ... associated with that?" JACKSON advised UCE 4180 that SENATOR YEE was ready and willing to grab the issue of medical marijuana. JACKSON said he would provide specific outcomes when UCE 4180 came to California. Later that day, FBI agents observed SENATOR YEE and JACKSON meeting.

The next day, April 25, 2013, KEITH JACKSON sent a text-message to UCE-4180 via JACKSON's T-Mobile account which read, "Good Morning, [UCE 4180], per your request, here is my account info ... Jackson Consultancy Bank of America [account number] ..." and also provided his business address in San Francisco. 2075 California Street San Francisco Ca, 94109." Per information received from T-Mobile, transmission of this text message would have been routed through Washington state. JACKSON was located in San Francisco, California when he sent the text. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and JACKSON.**

Later the same day, KEITH JACKSON advised UCE 4180 that SENATOR YEE wanted to have a private conversation with UCE 4180 when UCE 4180 came out to visit in May. JACKSON stated that he had spoken with SENATOR YEE and SENATOR YEE was going to be as helpful as he could. During this call, UCE 4180 also confirmed that he had received JACKSON's text message with his bank account information.

On April 29, 2013, UCE 4180 made a direct cash deposit of $3,000 into KEITH JACKSON's bank account.

On May 9, 2013, CHS #11 met with KEITH JACKSON and SENATOR YEE at the Starbucks in the Marriott Marquis hotel in San Francisco. During the meeting, CHS #11 asked to speak with SENATOR YEE privately, at which point JACKSON got up and left the table for a few minutes. When CHS #11 mentioned to Senator YEE that UCE 4180 had given a total of $5,500 intended for SENATOR YEE, SENATOR YEE replied, "I haven't gotten any of that." Regarding UCE 4180, Senator YEE stated that he is a politician, he is not going to jail, he is going to play strictly by the rules, and the rules say that he cannot make money. Senator YEE added that the donation is to help get him elected. Senator YEE told CHS #11: "By helping me get elected means, I'm gonna take actions on your behalf. That's one thing you gotta understand."

On May 10, 2013, CHS #11 spoke on the telephone with SENATOR YEE. Due to technical issues, this call was not recorded. CHS #11 asked SENATOR YEE to contact State Senator 1 in order to express SENATOR YEE's support for legislation which would require medical marijuana dispensaries to have a medical doctor on staff. CHS #11 informed SENATOR YEE that it would benefit UCE 4180 if state legislation set high barriers of entry, such as requiring a medical doctor on staff, that would make it more difficult for small operators to open a business. CHS #11 offered SENATOR YEE $10,000 to $15,000 if SENATOR YEE was willing to make the call to State Senator 1. According to CHS #11, SENATOR YEE agreed although he said that he could not make money for himself as part of the arrangement.

On May 11, 2013, KEITH JACKSON and SENATOR YEE spoke on the telephone and discussed SENATOR YEE's meeting with CHS #11. JACKSON asked SENATOR YEE if he had made a call to State Senator 1 yet. Senator YEE responded, "[s]hit. That's pay to play and you can't do that.

You cannot connect. You could go to jail for that. ... They got to understand, it's about the long term. It's not about the short term."

On May 14, 2013, SENATOR YEE and KEITH JACKSON spoke on the phone again. SENATOR YEE told JACKSON that he had not talked to State Senator 1 yet, but asked if UCE 4180 [or CHS 11] was "going to give us the, the stuff or not." JACKSON responded, "[y]eah, yeah, I think once, once he gets, you know, that the first issue [State Senator 1]. The second issue, I think he, after that he'll do whatever he needs to do. And so, he was still confused, so Leland, I think the best thing for these guys to do is go ahead and just write a check for 6,800 bucks." SENATOR YEE responded, "[y]eah, yeah, they should, they should be doing that, right? ... That's what we want them to do." Later in the discussion, SENATOR YEE mentioned CHS #11 again and said: "Just give me the goddam money, man shit," ... "you should just tell them, write some fucking checks, man." At one point in the conversation, JACKSON asked Senator YEE, "[i]s that hard to do with [State Senator 1]?" Senator YEE responded: "No, I mean, I, I, I can ask him, you know, um, about the, uh, you know when we're going to do uh, what uh, these uh medicinal marijuana, you know we got to have doctors there, and I'll just ask, and he says yeah, that's fine, I'll just yeah ... But I need to see him." Senator YEE said that he expected to see State Senator 1 that day.

On May 16, 2013, SENATOR YEE again instructed KEITH JACKSON to get money out of CHS #11 and UCE 4180. SENATOR YEE told JACKSON that SENATOR YEE thought what he could do regarding UCE 4180 is "be sorta the bad guy and say, look, you know [UCE 4180], you know, I can't do pay to play. You know, I mean, this is a long-term investment, uhm, you know, I wanna work with you. I think you're a great guy, I think we can really help each other, but the only way you're gonna, I'm gonna be able to help you, long-term, is if I become Secretary of State."

On May 17, 2013, UCE 4180 and another FBI undercover employee, UCE-3357, posing as UCE 4180's business partner, met with KEITH JACKSON, SENATOR YEE, and a guest of SENATOR YEE

for dinner at Alexander's Steakhouse in San Francisco. During the dinner, UCE 4180 discussed CHS #11's offer to pay $10,000 to SENATOR YEE to reach out to State Senator 1. SENATOR YEE stated he was not interested in money, but rather wanted his friends to benefit from his work. Not long after SENATOR YEE made that statement, UCE 4180 gave SENATOR YEE an envelope containing $5,000 in cash. SENATOR YEE asked, "[i]s there a check?" and UCE 4180 stated, "[i]t's not a check . . . I thought we already discussed that. I don't do checks." SENATOR YEE and JACKSON then went on to discuss UCE 4180's interests in medical marijuana legislation in California. UCE 4180 provided JACKSON and Senator YEE with a written proposal purported to have been prepared by a political consulting agency that suggested provisions UCE 4180 wanted to see in medical marijuana legislation, such as having a doctor available for consultation on-site.

On the evening of May 20, 2013, SENATOR YEE and JACKSON spoke on the phone and arranged to meet at a coffee shop in San Francisco. Approximately thirty minutes later, JACKSON telephoned UCE 4180 and told UCE 4180 that he was with SENATOR YEE. JACKSON then gave the phone to SENATOR YEE. SENATOR YEE told UCE 4180 that he wanted to give UCE 4180 "the update," and went on to inform UCE 4180 about the status of two bills pertaining to medical marijuana pending in the California Assembly and Senate. UCE 4180 was located in Phoenix, Arizona during this call. During the evening of the same day, FBI agents observed JACKSON and Senator YEE meeting at a coffee shop in San Francisco. **I believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and JACKSON.**

On May 27, 2013, SENATOR YEE and KEITH JACKSON spoke on the telephone about how they could set up some meetings for UCE 4180 in Sacramento. JACKSON and SENATOR YEE agreed to discuss the subject further in person. Later that evening, at approximately 6:55 p.m., FBI agents observed JACKSON and SENATOR YEE meeting at a Starbucks in San Francisco.

On June 4, 2013, the FBI conducted a search warrant at the Senate office of California State Senator Ron Calderon in Sacramento. The same day, SENATOR YEE and KEITH JACKSON spoke on the phone about the search. SENATOR YEE told JACKSON, "[y]eah man, got to be really, real careful. Got to double check, triple check everything." The next day, SENATOR YEE again instructed JACKSON to be careful and that they needed to talk to UCE 4180 and instruct him: "[y]ou gotta be careful about this stuff. This big stuff."

On June 7, 2013, UCE 4180 sent an e-mail to KEITH JACKSON stating that he was frustrated with JACKSON and what JACKSON had produced so far. UCE-4180 wrote that he had paid money to JACKSON and SENATOR YEE and so far there was nothing motivating UCE 4180 to pay more. UCE 4180 asked JACKSON to have SENATOR YEE set up a meeting with other legislators on the medical marijuana issue.

Later the same day, KEITH JACKSON e-mailed UCE 4180 to let him know that SENATOR YEE had set up a meeting with State Senator 1 in Sacramento on June 20, 2013 to discuss the issue of medical marijuana.

On June 9, 2013, SENATOR YEE and KEITH JACKSON had a conference call with UCE 4180. Senator YEE stated that it was tense in the Capitol right now and that you had to assume everyone was "wearing a wire." SENATOR YEE went on to say that he was going to try to keep helping UCE 4180, and added that medical marijuana was a long-term issue and would probably be dealt with by the next generation of legislators. UCE 4180 asked that SENATOR YEE set up a meeting with a specific legislator, to which SENATOR YEE responded that he would see what he could do. However, SENATOR YEE discouraged UCE 4180 from meeting that particular legislator because that legislator lacked the political clout to make a difference. Alternatively, SENATOR YEE offered to set up a meeting with State Senator 1.

On June 20, 2013, UCE 4180, UCE 3357, SENATOR YEE, and KEITH JACKSON met in SENATOR YEE's Senate office in Sacramento, California. During the meeting, SENATOR YEE discussed the difficulty of passing medical marijuana legislation in California. SENATOR YEE stated he had set up a meeting with State Senator 1.

At the meeting on June 20, 2013, UCE 4180 told SENATOR YEE he was willing to make campaign contributions to secure the support of legislators. SENATOR YEE responded by stating, "[y]ou can't do that, man, you go to jail for that." SENATOR YEE explained that you cannot link contributions with any items, bills or amendments. At the end of the meeting, SENATOR YEE asked UCE 3357 to keep UCE 4180 in check because he could get them all in trouble. SENATOR YEE then accompanied UCE 4180, UCE 3357 and JACKSON on the walk to a nearby café to meet with State Senator 1. During the walk, SENATOR YEE stated, "I'm just trying to run for Secretary of State, I hope I don't get indicted."

On June 20, 2013, UCE 4180, UCE 3357, SENATOR YEE and KEITH JACKSON met with State Senator 1 at a café in Sacramento. SENATOR YEE told State Senator 1 that the UCEs were interested in the medical marijuana issue, and were seeking high barriers to entry. SENATOR YEE explained how he was "warming up" to the issue of medical marijuana because sick people in his community needed it.

The next day, on June 21, 2013, KEITH JACKSON met with UCE 4180 and UCE 3357 in the UCEs' hotel room in San Francisco. JACKSON told UCE 4180 that SENATOR YEE was nervous about discussing money in front of the people with whom they had meetings. UCE 4180 said he understood and asked if he could talk money with SENATOR YEE directly, in private. JACKSON responded, "[a]s long as we have it among ourselves, we're cool." JACKSON said SENATOR YEE wanted to be helpful, and JACKSON would have to spend a lot of time in Sacramento having meetings. JACKSON also agreed to attempt to set up meetings with additional legislators. UCE 4180 stated that

he would give cash commensurate with performance. Later in the meeting, UCE 4180 declared that he only wanted to give cash in exchange for SENATOR YEE's actions [as opposed to checks], because "it's not legitimate money." UCE 4180 told JACKSON that he would provide additional money in order to assist in breaking up the cash donations. JACKSON responded, "I'll have a conversation with him tonight," but advised "[t]hey watch everything you do and how you document it." JACKSON stated "I've got to talk to [SENATOR YEE's] guy and figure it out." JACKSON stated, "Leland will play, but he gets kinda nervous in conversations around certain people."

The following day, June 22, 2013, SENATOR YEE and KEITH JACKSON met with UCE 4180 and UCE 3357 in the UCEs' hotel room in San Francisco. This meeting was consensually recorded on both audio and video. The group discussed the status of medical marijuana policy and the politics of state marijuana regulation. UCE 4180 took an envelope containing $11,000 in cash and put it on the table in front of SENATOR YEE and JACKSON. UCE 4180 stated, "[t]his is a campaign donation and Keith and you can talk about that. That's for the meeting with [State Senator 1]." UCE 4180 said his contributions were "not coming in the form of checks." The envelope remained on the table for the duration of the meeting. The conversation during the meeting focused for the most part on a pending bill on another topic in which SENATOR YEE thought UCE 4180 would be interested. As SENATOR YEE and JACKSON got up to leave, SENATOR YEE made a gesture to JACKSON toward the envelope of cash, but JACKSON did not see the gesture. SENATOR YEE then walked over to JACKSON, tapped him on the back, again gestured to the envelope, and said, "[t]ake that." JACKSON picked up the envelope. SENATOR YEE said that JACKSON would walk him to his car and return.

When KEITH JACKSON returned to the room, he advised the UCEs that SENATOR YEE was willing to move forward and be helpful, including arranging to set up a meeting with the legislator with whom UCE 4180 had requested a meeting. UCE 4180 stated that he was willing to make campaign donations for meetings that will help his agenda. JACKSON responded, "on that note..." and continued

by saying that SENATOR YEE was asking for a little bit more; they were trying to reach $45,000. UCE 4180 said he understood, but added that they only had one meeting with someone of value.

During a telephone conversation on July 4, 2013, SENATOR YEE complained to KEITH JACKSON about UCE 4180 nickel and diming them, and that it was too close to pay to play. JACKSON asked whether they should just let UCE 4180 go. SENATOR YEE asked whether UCE 4599 had produced any more checks. SENATOR YEE then told JACKSON that he should get his son [BRANDON JACKSON] to open a dispensary so that if UCE 4180 does what he says he wants to do in California, UCE 4180 could then buy out JACKSON's son. SENATOR YEE stated that $20,000 to $40,000 in campaign contributions is chump change when there is millions of dollars to make and invest in. SENATOR YEE concluded by telling JACKSON to tell UCE-4180,"[t]ime's ticking away, you know, I mean, we need to get the dollars now so that we can get those checks out man."

On July 13, 2013, SENATOR YEE, KEITH JACKSON, UCE 4180, and UCE 3357 attended an event at which SENATOR YEE briefly introduced the UCEs to another legislator, referred to herein as Legislator 1.

During a telephone conversation on July 15, 2013, SENATOR YEE complained to KEITH JACKSON that UCE 4180 came all the way out to California – referring to the meeting on July 13 -- and "he didn't give us anything," and "[t]hat's so wrong, man." The same day, JACKSON spoke with UCE 4180 and expressed frustration. UCE 4180 stated he was used to results and therefore, from this point forward, he would pay on a per-meeting basis.

After KEITH JACKSON spoke with UCE 4180, he spoke with SENATOR YEE on the telephone. SENATOR YEE complained about all the time he wasted with UCE 4180 and said they should go their separate ways. JACKSON then stated that he also thought he was going to walk away from UCE 4180, to which SENATOR YEE told him to do what he needed to do. SENATOR YEE continued, "[i]t's just that, you know, the guy's just dragged, for all the stuff we've done, huh? What

have we come up with, $15,000? ... $15,000 man, shit. For what we did man? Shit. You know, we got him close to uh, [State Senator 1]. We got him close to [Legislator 1].

On July 21, 2013, KEITH JACKSON told UCE 4180 that SENATOR YEE wanted to continue to work with UCE 4180, but that SENATOR YEE was concerned because UCE 4180 did not pay anything on his most recent trip to California. UCE 4180 pointed out that he has paid $30,000 for one meeting and one introduction that did not count. JACKSON explained that SENATOR YEE did not want money every time UCE 4180 comes out to California, but UCE 4180 committed to $50,000 and SENATOR YEE wanted to make sure "we get there." JACKSON stated if UCE 4180 gave $25,000 in August, everyone would be happy.

On August 26, 2013, UCE 4180, UCE 3357, SENATOR YEE and KEITH JACKSON met with State Senator 2 in Sacramento. SENATOR YEE introduced UCE 4180 and explained what UCE 4180's interests were. UCE 4180 also explained his interests. During the meeting, SENATOR YEE advocated for UCE 4180's position of heavy regulation of medical marijuana, saying at one point, if medical marijuana is going to become mainstream, "[y]ou've got to have those kind of barriers" that UCE-4180 wants.

On September 17, 2013, KEITH JACKSON met with UCE 4180 at the Marriott Marquis Hotel in San Francisco. JACKSON said that SENATOR YEE was upset because UCE 4180 had not paid for the meeting with State Senator 2. In response, UCE 4180 showed JACKSON $10,000 cash which he said was for the meeting. UCE 4180 wanted to meet SENATOR YEE to pay him the money. UCE 4180 told JACKSON that he also wanted to offer SENATOR YEE and JACKSON ownership in UCE 4180's medical marijuana business in exchange for introducing a new marijuana bill. UCE 4180 explained that the stock would be worthless without the bill being introduced and passed. JACKSON and UCE-4180 then arranged to meet Senator YEE later that evening.

On the evening of the same day, September 17, 2013, SENATOR YEE and KEITH JACKSON met with UCE 4180 at a restaurant in San Francisco's Chinatown. UCE 4180 told SENATOR YEE that he was paying for the meetings and handed an envelope with $10,000 cash to JACKSON while telling SENATOR YEE that the playing field was now level (referring to the meeting with State Senator 2). UCE 4180 asked SENATOR YEE how much he would want to introduce marijuana legislation. SENATOR YEE said that he would have to think about the number. UCE 4180 proposed giving SENATOR YEE and JACKSON stock in his company for the legislation and that SENATOR YEE's stock would be in JACKSON's name. SENATOR YEE said he thought that UCE 4180 wanted SENATOR YEE to navigate the political landscape and not introduce legislation. SENATOR YEE described the legislation as a "heavy lift," and asked for time to think about it.

On December 18, 2013, UCE 4180 spoke to KEITH JACKSON on the phone. JACKSON told UCE 4180 that JACKSON had not forgotten about UCE 4180 and the legislative session was about to start up. JACKSON said, "we need to come up with some strategy" because a lot of things are moving and there will be some new "political people" in charge. UCE 4180 asked JACKSON why he had not heard from JACKSON or SENATOR YEE for several months and JACKSON responded that the issue with Senator Calderon had caused people to lay low.

III. CONCLUSION

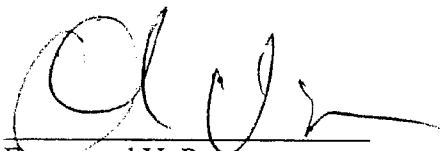
Based on the foregoing, I request that a Criminal Complaint issue for the Targets listed in Part B of Section I of this Affidavit, based upon Probable Cause as described in Section II of this Affidavit. In summary, as follows:

Defendant	Date	Offense	Penalty
SIU	April 12, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; $250,000 fine; $100 assessment
NIEH	April 13, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; $250,000 fine; $100 assessment
CHOW, NIEH	July 14, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; $250,000 fine;

			$100 assessment
CHOW, CHIU	August 1, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; $250,000 fine; $100 assessment
CHOW, NIEH, JANE LIANG, TINA LIANG, TILTON	December 13, 2011 to March 9, 2012	18 USC 371, 2315, 2314	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
NIEH, CHANTHAVONG	February 14, 2012	21 USC 841, 846	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
CHOW, NIEH, PAU, YUN	May 22, 2012	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; $250,000 fine; $100 assessment
CHOW, NIEH, MA, SO	September 8, 2012 to September 10, 2012	18 USC 371, 2315	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
NIEH, CHANTHAVONG, LI	September 26, 2012	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
NIEH, CHANTHAVONG, LI	September 26, 2012	18 USC 922(g)(1)	Up to 10 years prison; 3 years supervised release; $250,000 fine; $100 assessment
NIEH, CHANTHAVONG	October 2, 2012	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
NIEH, CHANTHAVONG	October 2, 2012	18 USC 922(g)(1)	Up to 10 years prison; 3 years supervised release; $250,000 fine; $100 assessment
CHANTHAVONG	October 24, 2012	21 USC 841(a)(1)(B)	From 5 to 40 years; 4 years supervised release; $5,000,000 fine; $100 assessment
CHANTHAVONG	October 24, 2012	18 USC 924(c)	From 5 years to life consecutive; 5 years supervised release; $250,000 fine; $100 assessment
MEI	October 30, 2012	21 USC 841(a)(1)(B)	From 5 to 40 years; 4 years supervised release; $5,000,000 fine; $100 assessment
CHANTHAVONG, LI	January 23, 2013	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
CHANTHAVONG, LI	January 23, 2013	18 USC 922(g)(1)	Up to 10 years prison; 3 years supervised release; $250,000 fine; $100 assessment
LI, NHINGSAVATH, MASTRANGELO, CHOW	April 16, 2013 to April 17, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; $500,000 fine; $100 assessment
KEITH JACKSON, BRANDON JACKSON, SULLIVAN	September 20, 2012 to March 26, 2014	21 USC 846	From 10 years to life prison; at least 5 years supervised release; $10,000,000 fine; $100 assessment
KEITH JACKSON, BRANDON JACKSON,	June 25, 2013	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment

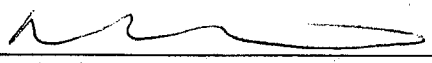
SULLIVAN			
CHOW, NIEH, PAU, YUN	July 18, 2013 to July 23, 2013	18 USC 371, 2315, 2342(a) and 2344	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
ROEUN	August 28, 2013	18 USC 1958	Up to 10 years prison; 3 years supervised release; $250,000 fine; $100 assessment
CHOW, NIEH, ELAINE LIANG, GEE	September 9, 2013 to September 12, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; $500,000 fine; $100 assessment
LI, CHANTHAVONG	September 18, 2013	21 USC 846	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
ELAINE LIANG, GEE, CHEN, LAI	October 15, 2013 to October 16, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; $500,000 fine; $100 assessment
CHEN, LAI, GEE, ELAINE LIANG, NIEH	December 5, 2013 to December 6, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; $500,000 fine; $100 assessment
KEITH JACKSON, BRANDON JACKSON, SULLIVAN	December 13, 2013 to March 3, 2014	18 USC 1958	Up to 10 years prison; 3 years supervised release; $250,000 fine; $100 assessment
TINA LIANG, TILTON	February 20, 2014	21 USC 846	From 5 to 40 years; 4 years supervised release; $5,000,000 fine; $100 assessment
ROUEN	February 26, 2014	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
LELAND YEE, KEITH JACKSON, LIM	August 5, 2013 to March 26, 2014	18 USC 371, 922(a)(1), 922(l)	Up to 5 years prison; 3 years supervised release; $250,000 fine; $100 assessment
LELAND YEE, KEITH JACKSON	September 26, 2012	18 USC 1343, 1346, 2	Up to 20 years in prison; 3 years supervised release; $250,000 fine; $100 special assessment
LELAND YEE, KEITH JACKSON	October 18, 2012	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; $250,000 fine; $100 special assessment
LELAND YEE, KEITH JACKSON	October 18, 2012	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; $250,000 fine; $100 special assessment
LELAND YEE, KEITH JACKSON	April 25, 2013	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; $250,000 fine; $100 special assessment
LELAND YEE, KEITH JACKSON	May 1, 2013	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; $250,000 fine; $100 special assessment
LELAND YEE, KEITH JACKSON	May 20, 2013	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; $250,000 fine; $100 special assessment

Under penalty of perjury, I swear that the foregoing is true and correct to the best of my knowledge, information, and belief.



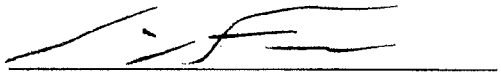
Emmanuel V. Pascua
Special Agent
Federal Bureau of Investigation

SWORN BEFORE ME
ON MARCH 23, 2014.



HONORABLE NATHANAEL M. COUSINS
UNITED STATES MAGISTRATE JUDGE

Approved as to form:



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