

1 MELINDA HAAG (CABN 132612)
United States Attorney

2
3 UNITED STATES DISTRICT COURT
4 NORTHERN DISTRICT OF CALIFORNIA
5 SAN FRANCISCO DIVISION

FILED
APR - 3 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CR 14 196
CRIMINAL NO.

CRB

7 UNITED STATES OF AMERICA,)

8 v.)

INDICTMENT

9 KWOK CHEUNG CHOW, a/k/a "Raymond)
Chow", a/k/a "Hai Jai", a/k/a "Shrimpboy";)
10 LELAND YEE, a/k/a Senator Leland Yee;)
GEORGE NIEH, a/k/a "Heng Nieh";)
11 KEITH JACKSON;)
KEVIN SIU, a/k/a "Dragon Tin Loong Siu";)
12 ALAN CHIU, a/k/a "Alan Shiu";)
KONGPHET CHANTHAVONG, a/k/a "Joe,")
13 a/k/a "Fat Joe";)
XIAO CHENG MEI, a/k/a "Michael Mei";)
14 BRANDON JAMELLE JACKSON;)
MARLON DARRELL SULLIVAN;)
15 RINN ROEUN;)
ANDY LI, a/k/a "Andy Man Lai Li";)
16 LESLIE YUN, a/k/a "Leslie Yuncheung";)
YAT WA PAU, a/k/a "James Pau";)
17 JANE MIAO XHEN LIANG;)
TINA YAO GUI LIANG;)
18 BRYAN TILTON;)
HUAN MING MA, a/k/a "Ming Ma," a/k/a)
19 "Baak Ban";)
HON KEUNG SO, a/k/a "Hon So";)
20 NORGE MASTRANGELO;)
ALBERT NHINGSAVATH;)
21 SERGE GEE;)
XIU YING LING LIANG, a/k/a "Elaine)
22 Liang";)
GARY KWONG YIU CHEN, a/k/a "Gary)
23 Chen," a/k/a "Jimmy," a/k/a "David";)
ANTHONY JOHN LAI, a/k/a "AJ";)
24 TONG ZAO ZHANG;)
ZHANGHAO WU, a/k/a "Jason";)
25 BARRY BLACKWELL HOUSE, a/k/a "Barry)
Black";)
26 WILSON SY LIM, a/k/a "Dr. Lim";)

VIOLATIONS -
18 U.S.C. § 1956 - Money Laundering;
18 U.S.C. § 922(a) - Dealing Firearms Without a
License;
18 U.S.C. § 922(l) - Illegal Importation of Firearms;
18 U.S.C. § 922(g) - Felon in Possession of
Firearm;
21 U.S.C. § 841 - Manufacture and Possession with
Intent to Distribute Narcotics;
21 U.S.C. § 846 - Narcotics Conspiracy;
18 U.S.C. § 924(c) - Possession of Firearm in
Furtherance of Drug Trafficking Crime;
18 U.S.C. §§ 2342 & 2344 - Trafficking in
Contraband Cigarettes;
18 U.S.C. § 1958 - Murder for Hire;
18 U.S.C. § 371 - Conspiracy;
18 U.S.C. § 1349 - Honest Services Conspiracy;
18 U.S.C. §§ 1343, 1346 - Honest Services Fraud;
18 U.S.C. § 2 - Aiding And Abetting

27 Defendants.
28

1 INDICTMENT

2 The Grand Jury charges:

3 COUNT ONE: (18 U.S.C. § 1956(a)(3)(A) -- Money Laundering)

4 On or about April 12, 2011, in the Northern District of California, the defendant,
5 KEVIN SIU,
6 with the intent to promote the carrying on of specified unlawful activity, did knowingly conduct and
7 attempt to conduct a financial transaction affecting interstate or foreign commerce involving property
8 represented by a law enforcement officer to be proceeds of specified unlawful activity and property used
9 to conduct or facilitate specified unlawful activity, to wit: accepting \$44,000 in U.S. Currency in
10 exchange for sending a wire transfer of \$40,000 from a financial institution account to an account of a
11 fictitious business.

12 All in violation of Title 18, United States Code, Sections 1956(a)(3)(A).

13
14 COUNT TWO: (18 U.S.C. § 1956(a)(3)(A) – Money Laundering)

15 On or about April 13, 2011, in the Northern District of California, the defendant,
16 GEORGE NIEH,
17 with the intent to promote the carrying on of specified unlawful activity, did knowingly conduct and
18 attempt to conduct a financial transaction affecting interstate or foreign commerce involving property
19 represented by a law enforcement officer to be proceeds of specified unlawful activity and property used
20 to conduct or facilitate specified unlawful activity, to wit: accepting \$44,000 in U.S. Currency in
21 exchange for issuing three checks from financial institutions in the amount of \$40,000 total.

22 All in violation of Title 18, United States Code, Sections 1956(a)(3)(A).

23
24 COUNT THREE: (18 U.S.C. § 1956(a)(3)(A) – Money Laundering)

25 On or about July 14, 2011, in the Northern District of California, the defendants,

26 RAYMOND CHOW and
27 GEORGE NIEH,

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1 each aided and abetted by the other, with the intent to promote the carrying on of specified unlawful
2 activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or
3 foreign commerce involving property represented by a law enforcement officer to be proceeds of
4 specified unlawful activity and property used to conduct or facilitate specified unlawful activity, to wit:
5 issuing four checks from financial institutions in the amount of \$120,000 total in exchange for \$132,000
6 U.S. Currency.

7 All in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and 2.
8

9 COUNT FOUR: (18 U.S.C. § 1956(a)(3)(A) – Money Laundering)

10 On or about August 1, 2011, in the Northern District of California, the defendants,

11 RAYMOND CHOW and
12 ALAN CHIU,

13 each aided and abetted by the other, with the intent to promote the carrying on of specified unlawful
14 activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or
15 foreign commerce involving property represented by a law enforcement officer to be proceeds of
16 specified unlawful activity and property used to conduct or facilitate specified unlawful activity, to wit:
17 accepting \$33,000 in U.S. Currency in exchange for issuing four checks from a financial institution
18 totaling \$30,000.

19 All in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and 2.
20

21 COUNT FIVE: (21 U.S.C. § 846 – Narcotics Conspiracy)

22 On or about February 14, 2012, in the Northern District of California and elsewhere, the
23 defendants,

24 GEORGE NIEH and
25 KONGPHET CHANTHAVONG,

26 knowingly and intentionally combined, conspired, confederated and agreed together and with each
27 other, and with other persons known and unknown to the Grand Jury, to commit the following offense
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1 against the United States: to possess with intent to distribute and to distribute marijuana, a Schedule I
2 narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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

5 COUNT SIX: (18 U.S.C. § 371 – Conspiracy)

6 Between on or about December 13, 2011, through and including on or about March 13, 2012, in
7 the Northern District of California, and elsewhere, the defendants,

8 RAYMOND CHOW,
9 GEORGE NIEH,
10 JANE LIANG,
11 TINA LIANG, and
12 BRIAN TILTON,

13 knowingly and willfully conspired and agreed with each other and with others, known and unknown to
14 the Grand Jury, to commit offenses against the United States: that is,

- 15 (1) to receive, possess, store, sell, and dispose of property, that is, 50 cases of Hennessey XO
16 alcohol, of a value of \$5,000 or more which had crossed a State boundary after being stolen and
17 subsequently brought into the State of California, knowing the same to have been stolen, in
18 violation of Title 18, United States Code, Section 2315; and
19 (2) to transport, transmit, and transfer in interstate and foreign commerce from the State of
20 California to a location outside of the United States, stolen goods, wares and merchandise, that
21 is, 50 cases of Hennessey XO alcohol, of the value of \$5,000 or more, knowing the same to have
22 been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section
23 2314.

24 OVERT ACTS

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

- 27 1. On or about December 13, 2011, the defendant RAYMOND CHOW discussed selling stolen
28 liquor with an undercover employee;
2. On or about January 23, 2012, the defendants RAYMOND CHOW and GEORGE NIEH

1 discussed selling stolen liquor with an undercover employee and indicated that defendant TINA
2 LIANG would arrange buyers in China; .

- 3 3. On or about January 25, 2012, the defendant GEORGE NIEH discussed selling stolen liquor
4 with an undercover employee;
- 5 4. On or about February 6, 2012, the defendant JANE LIANG discussed selling stolen liquor with
6 an undercover employee;
- 7 5. On or about February 16, 2012, the defendant RAYMOND CHOW discussed selling stolen
8 liquor to TINA LIANG with an undercover employee;
- 9 6. On or about March 5, 2012, the defendants GEORGE NIEH and TINA LIANG met with an
10 undercover employee to discuss selling stolen liquor;
- 11 7. On or about March 9, 2012, the defendants TINA LIANG and BRYAN TILTON purchased
12 purportedly stolen liquor from an undercover employee.
- 13 8. On or about March 13, 2012, the defendant RAYMOND CHOW received payment for this
14 transaction.

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

16
17 COUNT SEVEN: (18 U.S.C. § 1956(a)(3)(A) – Money Laundering)

18 On or about May 16, 2012, in the Northern District of California, the defendants,

19 RAYMOND CHOW,
20 GEORGE NIEH,
21 JAMES PAU, and
LESLIE YUN,

22 each aided and abetted by the other, with the intent to promote the carrying on of specified unlawful
23 activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or
24 foreign commerce involving property represented by a law enforcement officer to be proceeds of
25 specified unlawful activity and property used to conduct or facilitate specified unlawful activity, to wit:
26 accepting \$33,000 in U.S. Currency in exchange for sending two wire transfers totaling \$30,000 from a
27 financial institution to an account of a fictitious business.

28 All in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and 2.

1 COUNT EIGHT: (18 U.S.C. § 371 – Conspiracy)

2 Between on or about June 20, 2012, through and including on or about September 19, 2012, in
3 the Northern District of California, and elsewhere, the defendants,

4 RAYMOND CHOW,
5 GEORGE NIEH,
6 MING MA, and
7 HON SO,

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

13 OVERT ACTS

14 In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt
15 acts, among others, were committed in the Northern District of California and elsewhere:

- 16 1. On or about June 20, 2012, the defendant GEORGE NIEH discussed selling stolen liquor with an
17 undercover employee;
- 18 2. On or about June 27, 2012, the defendants GEORGE NIEH, MING MA and HON SO met at a
19 restaurant so that MA and SO could purchase 12 cases of purportedly stolen Johnnie Walker
20 Blue Label Scotch for \$6,480;
- 21 3. On or about June 27, 2012, the defendant RAYMOND CHOW accepted payment for facilitating
22 the liquor sale;
- 23 4. On or about July 19, 2012, the defendant GEORGE NIEH discussed selling stolen liquor with an
24 undercover employee;
- 25 5. On or about August 16, 2012, the defendant GEORGE NIEH discussed selling stolen liquor with
26 an undercover employee;
- 27 6. On or about September 8, 2012, the defendants GEORGE NIEH and MING MA discussed
28 selling stolen liquor with an undercover employee;

1 7. On or about September 10, 2012, the defendants GEORGE NIEH, MING MA, and HON SO met
2 at a restaurant so that MA and SO could purchase 15 cases of purportedly stolen liquor for
3 \$8,100;

4 8. On or about September 19, 2012, the defendants RAYMOND CHOW and GEORGE NIEH
5 accepted payment for facilitating the liquor sale.

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

7
8 COUNT NINE: (21 U.S.C. § 846 – Narcotics Conspiracy)

9 Beginning on or about September 20, 2012, and continuing to on or about April 4, 2013, in the
10 Northern District of California and elsewhere, the defendants,

11 KEITH JACKSON,
12 BRANDON JACKSON, and
13 MARLON SULLIVAN,

14 knowingly and intentionally combined, conspired, confederated, and agreed together and with each
15 other, and with other persons known and unknown to the Grand Jury, to commit the following offense
16 against the United States: to possess with intent to distribute and to distribute five (5) kilograms or more
17 of a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation
18 of Title 21, United States Code, Section 841(a)(1).

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

20 COUNT TEN: (18 U.S.C. § 922(a)(1) – Dealing Firearms Without a License)

21 On or about September 26, 2012, in the Northern District of California, the defendants,

22 GEORGE NIEH,
23 KONGPHET CHANTHAVONG, and
24 ANDY LI,

25 each aided and abetted by the other, and not being a licensed dealer of firearms within the meaning of
26 Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

27 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

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1 COUNT ELEVEN: (18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm)

2 On or about September 26, 2012, in the Northern District of California, the defendants,

3 GEORGE NIEH,
4 KONGPHET CHANTHAVONG, and
5 ANDY LI,

6 each aided and abetted by the other, having previously been convicted of an offense punishable by more
7 than one year imprisonment, did knowingly possess in interstate and foreign commerce a firearm, that is,
8 a .357 Magnum Smith and Wesson revolver, serial number AYL5133.

9 All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

10 COUNT TWELVE: (18 U.S.C. § 922(a)(1) – Dealing Firearms Without a License)

11 On or about October 2, 2012, in the Northern District of California, the defendants,

12 GEORGE NIEH and
13 KONGPHET CHANTHAVONG,

14 each aided and abetted by the other and not being a licensed dealer of firearms within the meaning of
15 Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

16 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

17
18 COUNT THIRTEEN: (18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm)

19 On or about October 2, 2012, in the Northern District of California, the defendants,

20 GEORGE NIEH and
21 KONGPHET CHANTHAVONG,

22 each aided and abetted by the other, having previously been convicted of an offense punishable by more
23 than one year imprisonment, did knowingly possess in interstate and foreign commerce a firearm, that is,
24 a .223 caliber Daewoo DR-200 rifle bearing serial number RA001216.

25 All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

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1 COUNT FOURTEEN: (21 U.S.C. § 841(a)(1)(B) – Possession with Intent to Distribute Cocaine)

2 On or about October 24, 2012, in the Northern District of California and elsewhere, the
3 defendant,

4 KONGPHET CHANTHAVONG,

5 knowingly and intentionally possessed with intent to distribute five hundred grams or more of a mixture
6 and substance containing a detectable amount of cocaine, its salts, isomers, and salts of isomers, a
7 Schedule II controlled substance.

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

10 COUNT FIFTEEN: (21 U.S.C. § 841(a)(1)(B) – Manufacture and Possession
11 With Intent to Distribute Marijuana)

12 On or about October 24, 2012, in the Northern District of California and elsewhere, the
13 defendant,

14 KONGPHET CHANTHAVONG,

15 knowingly and intentionally manufactured and possessed with intent to distribute 100 or more marijuana
16 plants, a Schedule I controlled substance.

17 All in violation of Title 21, United States Code, Section 841(a)(1)(B).
18

19 COUNT SIXTEEN: (18 U.S.C. § 924(c)(1)(A) – Possession of a Firearm
20 In Furtherance of a Drug Trafficking Crime)

21 On or about October 24, 2012, in the Northern District of California, the defendant,

22 KONGPHET CHANTHAVONG,

23 did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be
24 prosecuted in a court of the United States, that is, the possession with intent to distribute cocaine, as
25 charged in Count Fourteen of this Indictment, and the manufacture and possession with intent to
26 distribute marijuana, as charged in Count Fifteen of this Indictment.

27 All in violation of Title 18, United States Code, Section 924(c)(1)(A).
28 //

1 COUNT SEVENTEEN: (21 U.S.C. § 841(a)(1)(B) – Manufacture and Possession
2 With Intent to Distribute Marijuana)

3 On or about October 30, 2012, in the Northern District of California and elsewhere, the
4 defendant,

5 MICHAEL MEI,

6 knowingly and intentionally manufactured and possessed with intent to distribute 100 or more marijuana
7 plants, a Schedule I controlled substance.

8 All in violation of Title 21, United States Code, Section 841(a)(1)(B).

9
10 COUNT EIGHTEEN: (18 U.S.C. § 922(a)(1) – Dealing Firearms Without a License)

11 On or about January 23, 2013, in the Northern District of California, the defendants,

12 KONGPHET CHANTHAVONG and
13 ANDY LI,

14 each aided and abetted by the other and not being a licensed dealer of firearms within the meaning of
15 Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

16 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

17
18 COUNT NINETEEN: (18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm)

19 On or about January 23, 2013, in the Northern District of California, the defendants,

20 KONGPHET CHANTHAVONG and
21 ANDY LI,

22 each aided and abetted by the other, having previously been convicted of an offense punishable by more
23 than one year imprisonment, did knowingly possess in interstate and foreign commerce a firearm, that is,
24 a .40 caliber Ruger SR40 handgun, serial number 342-08483.

25 All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

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1 COUNT TWENTY: (18 U.S.C. § 1956(a)(1)(A)(i) – Money Laundering)

2 On or about April 15, 2013, in the Northern District of California and elsewhere, the defendants,

3 ANDY LI,
4 ALBERT NHINGSAVATH, and
5 NORGE MASTRANGELO,

6 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
7 transaction affecting interstate and foreign commerce, to wit delivery of \$49,810 in U.S. Currency,
8 which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and
9 distribution of narcotics in violation of Title 21, United States Code, Sections 846 and 841, with the
10 intent to promote the carrying on of specified unlawful activity, to wit: conspiracy to distribute and
11 distribution of narcotics in violation of 21 United States Code Sections 846 and 841, and that while
12 conducting and attempting to conduct such financial transaction, knew that the property involved in the
13 financial transaction represented the proceeds of some form of unlawful activity.

14 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

15 COUNT TWENTY-ONE: (18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering)

16 On or about April 15, 2013, in the Northern District of California and elsewhere, the defendants,

17 ANDY LI,
18 ALBERT NHINGSAVATH, and
19 NORGE MASTRANGELO,

20 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
21 transaction affecting interstate and foreign commerce, to wit, delivery of \$49,810 U.S. Currency, which
22 involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and distribution of
23 narcotics in violation of Title 21, United States Code, Sections 846 and 841, knowing that the
24 transaction was designed in whole and in part to conceal and disguise, the nature, location, source,
25 ownership, and control of the proceeds of said specified unlawful activity and that while conducting and
26 attempting to conduct such financial transaction knew that the property involved in the financial
27 transaction represented the proceeds of some form of unlawful activity.

28 All in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

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1 COUNT TWENTY-TWO: (18 U.S.C. § 1956(a)(1)(A)(i) – Money Laundering)

2 On or about April 16, 2013, in the Northern District of California and elsewhere, the defendants,

3 ANDY LI,
4 ALBERT NHINGSAVATH, and
5 NORGE MASTRANGELO,

6 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
7 transaction affecting interstate and foreign commerce, to wit transfer, delivery, and receipt of \$48,000 in
8 U.S. Currency, which involved the proceeds of a specified unlawful activity, that is conspiracy to
9 distribute and distribution of narcotics in violation of Title 21, United States Code, Sections 846 and
10 841, with the intent to promote the carrying on of specified unlawful activity, to wit: conspiracy to
11 distribute and distribution of narcotics in violation of 21 United States Code Sections 846 and 841, and
12 that while conducting and attempting to conduct such financial transaction, knew that the property
13 involved in the financial transaction represented the proceeds of some form of unlawful activity.

14 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

15 COUNT TWENTY-THREE: (18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering)

16 On or about April 16, 2013, in the Northern District of California and elsewhere, the defendants,

17 ANDY LI,
18 ALBERT NHINGSAVATH, and
19 NORGE MASTRANGELO,

20 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
21 transaction affecting interstate and foreign commerce, to wit, transfer, delivery, and receipt of \$48,000
22 U.S. Currency, which involved the proceeds of a specified unlawful activity, that is conspiracy to
23 distribute and distribution of narcotics in violation of Title 21, United States Code, Sections 846 and
24 841, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature,
25 location, source, ownership, and control of the proceeds of said specified unlawful activity and that
26 while conducting and attempting to conduct such financial transaction knew that the property involved
27 in the financial transaction represented the proceeds of some form of unlawful activity.

28 All in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

1 COUNT TWENTY-FOUR: (18 U.S.C. § 922(a)(1) – Dealing Firearms Without a License)

2 On or about June 24, 2013, in the Northern District of California, the defendants,

3 KEITH JACKSON,
4 BRANDON JACKSON, and
5 MARLON SULLIVAN,

6 each aided and abetted by the other and not being a licensed dealer of firearms within the meaning of
7 Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

8 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

9 COUNT TWENTY-FIVE: (18 U.S.C. § 922(a)(1) – Dealing Firearms Without a License)

10 On or about June 25, 2013, in the Northern District of California, the defendants,

11 KEITH JACKSON,
12 BRANDON JACKSON, and
13 MARLON SULLIVAN,

14 each aided and abetted by the other and not being a licensed dealer of firearms within the meaning of
15 Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

16 All done in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

17 COUNT TWENTY-SIX: (18 U.S.C. § 371 – Conspiracy)

18 From on or between June 19, 2013, to July 23, 2013, in the Northern District of California, and
19 elsewhere, the defendants,

20 RAYMOND CHOW,
21 GEORGE NIEH,
22 ZHANGHAO WU,
23 TONG ZAO ZHANG,
24 JAMES PAU, and
25 LESLIE YUN,

26 knowingly and willfully conspired and agreed with each other and with others, known and unknown to
27 the Grand Jury, to commit offenses against the United States: that is,

28 (1) to receive, possess, store, sell, and dispose of property, that is, a quantity of more than 10,000
cigarettes, of a value of \$5,000 or more which had crossed a State boundary after being stolen,

1 knowing the same to have been stolen, in violation of Title 18, United States Code, Section
2 2315; and

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

7 OVERT ACTS

8 In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt
9 acts, among others, were committed in the Northern District of California and elsewhere:

- 10 1. On or about June 19, 2013, the defendant RAYMOND CHOW discussed with JAMES PAU and
11 LESLIE YUN facilitating the sale of stolen cigarettes with an undercover employee;
- 12 2. On or about July 18, 2013, the defendants JAMES PAU and LESLIE YUN met with an
13 undercover employee to arrange sales of stolen and contraband cigarettes to buyers, including
14 defendants ZHANGHAO WU and TONG ZAO ZHANG;
- 15 3. On or about July 18, 2013, the defendants YUN and PAU gave the undercover employee
16 \$150,000 for the purportedly stolen and contraband cigarettes, which was \$17,900 less than the
17 agreed upon price;
- 18 4. On or about July 23, 2013, the defendant GEORGE NIEH gave the undercover employee the
19 remaining \$17,900 for the sale of the cigarettes;
- 20 5. On or about July 23, 2013, the defendants RAYMOND CHOW and GEORGE NIEH accepted
21 payment for their role in facilitating the sale of the cigarettes.

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

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1 COUNT TWENTY-SEVEN: (18 U.S.C. 1958 – Murder for Hire)

2 On or about August 28, 2013, in the Northern District of California and elsewhere, the
3 defendant,

4 RINN ROEUN,

5 knowingly and intentionally combined, conspired, confederated and agreed with other persons known
6 and unknown to the Grand Jury, to use, and did use a facility of interstate commerce, and caused another
7 to use a facility of interstate commerce with intent that the murder of Fictitious Victim 1 be committed
8 in violation of the laws of California, as consideration for the receipt of, and as consideration for a
9 promise and agreement to pay, things of pecuniary value, to wit: \$25,000 in U.S. Currency.

10 All in violation of Title 18, United States Code, Section 1958.

11
12 COUNT TWENTY-EIGHT: (18 U.S.C. § 1956(a)(1)(A)(i) – Money Laundering)

13 On or about September 9, 2013, in the Northern District of California and elsewhere, the
14 defendants,

15 RAYMOND CHOW,
16 GEORGE NIEH,
17 ELAINE LIANG, and
18 SERGE GEE,

19 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
20 transaction affecting interstate and foreign commerce, to wit delivery of \$203,000 U.S. Currency, which
21 involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and distribution of
22 narcotics in violation of Title 21, United States Code, Sections 846 and 841, with the intent to promote
23 the carrying on of specified unlawful activity, to wit: conspiracy to distribute and distribution of
24 narcotics in violation of 21 United States Code Sections 846 and 841, and that while conducting and
25 attempting to conduct such financial transaction, knew that the property involved in the financial
26 transaction represented the proceeds of some form of unlawful activity.

27 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

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1 COUNT TWENTY-NINE: (18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering)

2 On or about September 9, 2013, in the Northern District of California and elsewhere, the
3 defendants,

4 RAYMOND CHOW,
5 GEORGE NIEH,
6 ELAINE LIANG, and
7 SERGE GEE,

8 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
9 transaction affecting interstate and foreign commerce, to wit, delivery of \$203,000 in U.S. Currency,
10 which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and
11 distribution of narcotics in violation of Title 21, United States Code, Sections 846 and 841, knowing that
12 the transaction was designed in whole and in part to conceal and disguise, the nature, location, source,
13 ownership, and control of the proceeds of said specified unlawful activity and that while conducting and
14 attempting to conduct such financial transaction knew that the property involved in the financial
15 transaction represented the proceeds of some form of unlawful activity.

16 All in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

17 COUNT THIRTY: (18 U.S.C. § 1956(a)(1)(A)(i) – Money Laundering)

18 On or about September 10, 2013, in the Northern District of California and elsewhere, the
19 defendants,

20 RAYMOND CHOW,
21 GEORGE NIEH,
22 ELAINE LIANG, and
23 SERGE GEE,

24 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
25 transaction affecting interstate and foreign commerce, to wit transfer, delivery, and receipt of \$195,000
26 in U.S. Currency, which involved the proceeds of a specified unlawful activity, that is conspiracy to
27 distribute and distribution of narcotics in violation of Title 21, United States Code, Sections 846 and
28 841, with the intent to promote the carrying on of specified unlawful activity, to wit: conspiracy to
distribute and distribution of narcotics in violation of 21 United States Code Sections 846 and 841, and

1 that while conducting and attempting to conduct such financial transaction, knew that the property
2 involved in the financial transaction represented the proceeds of some form of unlawful activity.

3 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.
4

5 COUNT THIRTY-ONE: (18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering)

6 On or about September 10, 2013, in the Northern District of California and elsewhere, the
7 defendants,

8 RAYMOND CHOW,
9 GEORGE NIEH,
10 ELAINE LIANG, and
11 SERGE GEE,

12 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
13 transaction affecting interstate and foreign commerce, to wit, transfer, delivery, and receipt of \$195,000
14 U.S. Currency, which involved the proceeds of a specified unlawful activity, that is conspiracy to
15 distribute and distribution of narcotics in violation of Title 21, United States Code, Sections 846 and
16 841, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature,
17 location, source, ownership, and control of the proceeds of said specified unlawful activity and that
18 while conducting and attempting to conduct such financial transaction knew that the property involved
19 in the financial transaction represented the proceeds of some form of unlawful activity.

20 All in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.
21

22 COUNT THIRTY-TWO: (21 U.S.C. § 846 – Narcotics Conspiracy)

23 From on or about March 29, 2013, to on or about September 18, 2013, in the Northern District of
24 California and elsewhere, the defendants,

25 ANDY LI, and
26 KONGPHET CHANTHAVONG,

27 knowingly and intentionally combined, conspired, confederated, and agreed together and with each
28 other, and with other persons known and unknown to the Grand Jury, to commit the following offense

1 against the United States: to manufacture, to possess with intent to distribute and to distribute 100 or
2 more marijuana plants, a Schedule I narcotic controlled substance, in violation of Title 21, United States
3 Code, Section 841(a)(1)(B).

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

5
6 COUNT THIRTY-THREE: (18 U.S.C. § 1956(a)(1)(A)(i) – Money Laundering)

7 On or about October 15, 2013, in the Northern District of California and elsewhere, the
8 defendants,

9 GARY CHEN,
10 SERGE GEE,
11 ANTHONY LAI, and
12 ELAINE LIANG,

13 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
14 transaction affecting interstate and foreign commerce, to wit delivery of \$102,500 in U.S. Currency,
15 which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and
16 distribution of narcotics in violation of Title 21, United States Code, Sections 846 and 841, with the
17 intent to promote the carrying on of specified unlawful activity, to wit: conspiracy to distribute and
18 distribution of narcotics in violation of 21 United States Code Sections 846 and 841, and that while
19 conducting and attempting to conduct such financial transaction, knew that the property involved in the
20 financial transaction represented the proceeds of some form of unlawful activity.

21 All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 2.

22 COUNT THIRTY-FOUR: (18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering)

23 On or about October 15, 2013, in the Northern District of California and elsewhere, the
24 defendants,

25 GARY CHEN,
26 SERGE GEE,
27 ANTHONY LAI, and
28 ELAINE LIANG,

1 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
2 transaction affecting interstate and foreign commerce, to wit, delivery of \$102,500 in U.S. Currency,
3 which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and
4 distribution of narcotics in violation of Title 21, United States Code, Sections 846 and 841, knowing that
5 the transaction was designed in whole and in part to conceal and disguise, the nature, location, source,
6 ownership, and control of the proceeds of said specified unlawful activity and that while conducting and
7 attempting to conduct such financial transaction knew that the property involved in the financial
8 transaction represented the proceeds of some form of unlawful activity.

9 All in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

10
11 COUNT THIRTY-FIVE: (18 U.S.C. § 1956(a)(1)(A)(i) – Money Laundering)

12 On or about October 16, 2013, in the Northern District of California and elsewhere, the
13 defendants,

14 GARY CHEN,
15 SERGE GEE,
16 ANTHONY LAI, and
ELAINE LIANG,

17 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
18 transaction affecting interstate and foreign commerce, to wit transfer, delivery, and receipt of \$98,678
19 U.S. Currency, which involved the proceeds of a specified unlawful activity, that is conspiracy to
20 distribute and distribution of narcotics in violation of Title 21, United States Code, Sections 846 and
21 841, with the intent to promote the carrying on of specified unlawful activity, to wit: conspiracy to
22 distribute and distribution of narcotics in violation of 21 United States Code Sections 846 and 841, and
23 that while conducting and attempting to conduct such financial transaction, knew that the property
24 involved in the financial transaction represented the proceeds of some form of unlawful activity.

25 All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 2.

26 ///

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1 COUNT THIRTY-SIX: (18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering)

2 On or about October 16, 2013, in the Northern District of California and elsewhere, the
3 defendants,

4 GARY CHEN,
5 SERGE GEE,
6 ANTHONY LAI, and
7 ELAINE LIANG,

8 each aided and abetted by the other, did knowingly conduct and attempt to conduct a financial
9 transaction affecting interstate and foreign commerce, to wit, transfer, delivery, and receipt of \$98,678
10 in U.S. Currency, which involved the proceeds of a specified unlawful activity, that is conspiracy to
11 distribute and distribution of narcotics in violation of Title 21, United States Code, Sections 846 and
12 841, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature,
13 location, source, ownership, and control of the proceeds of said specified unlawful activity and that
14 while conducting and attempting to conduct such financial transaction knew that the property involved
15 in the financial transaction represented the proceeds of some form of unlawful activity.

16 All in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

17 COUNT THIRTY-SEVEN: (18 U.S.C. 1958 – Murder for Hire)

18 On or about December 13, 2013, in the Northern District of California and elsewhere, the
19 defendants,

20 KEITH JACKSON,
21 BRANDON JACKSON, and
22 MARLON SULLIVAN,

23 each aided and abetted by the other, used a facility of interstate commerce and caused another to use a
24 facility of interstate commerce with intent that the murder of Fictitious Victim 2 be committed in
25 violation of the laws of California, as consideration for the receipt of, and as consideration for a promise
26 and agreement to pay, things of pecuniary value, to wit: \$25,000 in U.S. Currency.

27 All in violation of Title 18, United States Code, Sections 1958 and 2.

28 ///

1 COUNT THIRTY-EIGHT: (21 U.S.C. § 846 – Narcotics Conspiracy)

2 On or about February 20, 2014, in the Northern District of California and elsewhere, the
3 defendants,

4 TINA LIANG and
5 BRIAN TILTON,

6 knowingly and intentionally combined, conspired, confederated, and agreed together and with each
7 other, and with other persons known and unknown to the Grand Jury, to commit the following offense
8 against the United States: to manufacture, to possess with intent to distribute and to distribute 100 or
9 more marijuana plants, a Schedule I narcotic controlled substance, in violation of Title 21, United States
10 Code, Section 841(a)(1)(B).

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

12
13 COUNT THIRTY-NINE: (18 U.S.C. § 922(a)(1) – Dealing Firearms Without a License)

14 On or about February 26, 2014, in the Northern District of California, the defendant,

15 RINN ROEUN,

16 not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
17 did willfully engage in the business of dealing in firearms.

18 All in violation of Title 18, United States Code, Sections 922(a)(1)(A).

19
20 COUNT FORTY: (18 U.S.C. § 922(a)(1) – Dealing Firearms Without a License)

21 On or about March 20, 2014, in the Northern District of California, the defendants,

22 KEITH JACKSON and
23 BARRY HOUSE,

24 each aided and abetted by the other and not being a licensed dealer of firearms within the meaning of
25 Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

26 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

27 ///

28 ///

1 COUNT FORTY-ONE: (18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm)

2 On or about March 20, 2014, in the Northern District of California, the defendant,

3 BARRY HOUSE,

4 having previously been convicted of an offense punishable by more than one year imprisonment, did
5 knowingly possess in interstate and foreign commerce a firearm, that is, a .380 caliber Cobra FS380
6 semi-automatic pistol.

7 All in violation of Title 18, United States Code, Sections 922(g)(1).
8

9 COUNT FORTY-TWO: (18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm)

10 On or about March 20, 2014, in the Northern District of California, the defendant,

11 BARRY HOUSE,

12 having previously been convicted of an offense punishable by more than one year imprisonment, did
13 knowingly possess in interstate and foreign commerce a firearm, that is, a .223 caliber Aero Precision
14 X15 rifle with an obliterated serial number.
15

16 All in violation of Title 18, United States Code, Sections 922(g)(1).
17

18 COUNT FORTY-THREE: (18 U.S.C. § 1349 – Honest Services Conspiracy)

19 INTRODUCTORY ALLEGATIONS

20 At all times relevant to this indictment:

21 The Defendants, Relevant Individuals, and Entities

22 1. Defendant LELAND YEE (hereafter “YEE”) was an elected California State Senator
23 who owed a fiduciary duty and a duty of honest services to the citizens of California, including his
24 constituents in the Eighth Senate District, which included San Mateo County and part of San Francisco
25 County.

26 2. YEE was a candidate in the San Francisco mayoral election held on November 8,
27 2011. YEE did not win the election.

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1 3. In November 2012, YEE publicly announced his intention to run for the position of
2 Secretary of State of California in the election to be held in November 2014.

3 4. Defendant KEITH JACKSON (hereafter "JACKSON") was the owner and managing
4 partner of Jackson Consultancy, a consulting company located in San Francisco, California. JACKSON
5 was a fund-raiser for Senator YEE's California Secretary of State and San Francisco mayoral
6 campaigns. JACKSON was also an associate of defendant RAYMOND CHOW, and was inducted into
7 the Chee Kung Tong in March of 2012.

8 5. RAYMOND CHOW, a/k/a Hai Jai, a/k/a "Shrimpboy," (hereafter "CHOW") was the
9 Dragonhead of the Chee Kung Tong. As such, he was responsible for mediating disputes between
10 members of the Chee Kung Tong and had supervisory responsibilities involving the Hop Sing Tong.

11 6. The Chee Kung Tong and the Hop Sing Tong were Chinese Benevolent Associations
12 with branches in San Francisco, California. The Chee Kung Tong and Hop Sing Tong carried out legal
13 functions within the community in San Francisco. The Chee Kung Tong and Hop Sing Tong also had
14 illegal factions that engaged in criminal activities.

15 7. UCE-4599 was an undercover agent for the Federal Bureau of Investigation (hereafter the
16 "FBI") who held himself out to defendants JACKSON, CHOW, and others as an East Coast organized
17 crime member of La Cosa Nostra with interests in illegal gambling, bookmaking, money laundering,
18 drug trafficking, dealing in stolen goods, and illegal firearms trafficking. UCE-4599 was inducted into
19 the Chee Kung Tong in March 2012.

20 8. UCE-4773 was an undercover agent for the FBI who held himself out to defendants
21 YEE, JACKSON, and others as a business associate of UCE-4599 who lived and worked in Atlanta,
22 Georgia. UCE-4773 represented himself as a businessman engaged in real estate development who also
23 represented a variety of investors and clients.

24 9. UCE-4180 was an undercover agent for the FBI who held himself out to defendants
25 YEE, JACKSON, and others as a businessman involved in the medical marijuana business in Arizona.
26 UCE-4180 represented that he was seeking to expand his business to California and was particularly
27 interested in statewide legislation in California that would include provisions favorable to his business
28 model.

1 UCE-4599 to make contributions to YEE's mayoral campaign, including soliciting UCE-4599 to make
2 donations in excess of the \$500 maximum individual donation amount set by law. UCE-4599 declined
3 to make any contributions, but introduced JACKSON to his purported business associate, UCE-4773.

4 15. Beginning in or about September 2011, YEE and JACKSON solicited UCE-4773 to
5 make individual contributions to, and raise money for, YEE's San Francisco mayoral campaign.
6 JACKSON solicited UCE-4773 to make donations in excess of the \$500 maximum individual donation
7 amount set by law. In response to solicitations for campaign donations by both YEE and JACKSON, on
8 or about October 11, 2011, UCE-4773 provided JACKSON with a \$5,000 personal check made payable
9 to "Jackson Consultancy."

10 16. On or about January 18, 2012, after losing the San Francisco mayoral campaign, YEE
11 solicited UCE-4773 to make additional donations toward, and raise money for, the retirement of the debt
12 from YEE's mayoral campaign. YEE also asked UCE-4773 to donate to YEE's planned campaign for
13 California Secretary of State in the election to be held in 2014.

14 17. During the next several months, JACKSON also solicited UCE-4773 to make donations
15 in order to retire YEE's debt from the mayoral campaign. In response to the solicitations from YEE and
16 JACKSON, on or about April 27, 2012, UCE-4773 mailed a \$5,000 personal check to JACKSON.

17 18. On or about June 26, 2012, UCE-4773 introduced YEE to two individuals acting in an
18 undercover capacity who were purportedly affiliated with UCE-4773's software consulting company
19 client, Well Tech. UCE-4773 explained to YEE that he was seeking to position Well Tech to compete
20 for grants and contracts, including public grants and contracts, in the State of California. YEE discussed
21 how the Secretary of State office might be of interest to UCE-4773 in furthering his goals for Well Tech.
22 During the same conversation, YEE acknowledged UCE-4773's "help with 5,000 and so on," and asked
23 for UCE-4773's "help with another 10."

24 19. During a meeting between UCE-4773, YEE, and JACKSON on or about September 4,
25 2012, YEE told UCE-4773 that he needed to retire the \$32,000 in debt from the mayoral race, could not
26 announce for Secretary of State until the debt was reduced, and asked UCE-4773 to "do another 10."
27 UCE-4773 said that he would need YEE to make a telephone call or two on behalf of Well Tech to the
28 state health department. YEE agreed to make the call.

1 20. On or about September 19, 2012, UCE-4773 spoke again with YEE and told YEE that he
2 needed a letter from YEE to the state health department on behalf of Well Tech. YEE agreed to write a
3 letter and told UCE-4773 to send him a draft.

4 21. On or about September 24, 2012, JACKSON and UCE-4773 spoke on the telephone, and
5 JACKSON again asked UCE-4773 for money to clear up YEE's mayoral campaign debt. UCE-4773
6 told JACKSON that he would do so once he received the letter on behalf of Well Tech from YEE. In a
7 subsequent conversation, on September 26, 2012, JACKSON told UCE-4773 that YEE was more
8 comfortable making telephone calls than with putting things in writing.

9 22. On or about October 18, 2012, YEE and UCE-4773 spoke on the telephone and UCE-
10 4773 explained that an individual with the California Department of Public Health was considering Well
11 Tech for a grant. UCE-4773 asked YEE to participate in a telephone call with UCE-4773 and this
12 individual and vouch for Well Tech. YEE agreed to participate in the telephone call.

13 23. Later the same day, October 18, 2012, YEE participated in a conference call with UCE-
14 4773 and UCE-4138. UCE-4138 was an undercover FBI agent posing as a staff services manager with
15 the California Department of Public Health who was considering Well Tech for a state grant. During the
16 call, YEE expressed his familiarity with and support for Well Tech.

17 24. On or about November 19, 2012, UCE-4599 met with JACKSON at a restaurant in San
18 Francisco and paid JACKSON \$10,000 cash on behalf of UCE-4773. UCE-4599 asked about the letter
19 from YEE on behalf of Well Tech that was still outstanding. JACKSON said the letter would be
20 forthcoming.

21 25. On or about November 23, 2012, YEE had a conversation with a member of his State
22 Senate staff about the \$10,000 that had been received by the campaign from UCE-4773.

23 26. On or about January 13, 2013, JACKSON sent to UCE-4773 a letter dated January 11,
24 2013 on the California State Senate letterhead of "Senator Leland Y. Yee, Ph.D., Eighth Senate
25 District." The letter, which appeared to be signed by YEE, was addressed to Well Tech and expressed
26 YEE's support for Well Tech's expansion to California.

27 Bribes Involving a State Senate Proclamation for the Chee Kung Tong

28 27. During the November 19, 2012 meeting when UCE-4599 paid JACKSON the \$10,000

1 campaign donation from UCE-4773, UCE-4599 and JACKSON discussed YEE's remaining mayoral
2 campaign debt of \$5,000. UCE-4599 asked JACKSON if he knew anyone who could assist CHOW in
3 getting CHOW's ankle monitoring device removed. JACKSON said he would ask YEE. UCE-4599
4 told JACKSON that he would pay off the remainder of the debt if YEE would assist CHOW.

5 28. JACKSON and YEE subsequently discussed UCE-4599's request and offer. YEE
6 discussed his knowledge of CHOW's criminal reputation and told JACKSON that as much as he wanted
7 the \$5,000, he could not agree to UCE-4599's request.

8 29. JACKSON introduced YEE to UCE-4599 at a restaurant in San Francisco on or about
9 January 22, 2013. UCE-4599 and YEE discussed CHOW and CHOW's criminal reputation. UCE-4599
10 asked YEE instead to provide an official proclamation to the Chee Kung Tong at an upcoming
11 celebration of the Chee Kung Tong's anniversary. YEE agreed to the request.

12 30. On or about February 14, 2013, JACKSON told UCE-4599 that YEE would be doing the
13 proclamation for the Chee Kung Tong. UCE-4599 told JACKSON that he would provide YEE a check
14 at the celebration or shortly thereafter.

15 31. On or about March 29, 2013, a staff member from one of YEE's district offices appeared
16 at the Chee Kung Tong anniversary celebration dinner in San Francisco and presented a framed
17 proclamation on California State Senate letterhead to the Chee Kung Tong. The staffer said she was
18 officially presenting the proclamation from Senator YEE.

19 32. On or about May 1, 2013, JACKSON sent a text message to UCE-4599 telling him to
20 make his check out to "Leland Yee. For Secretary of State."

21 33. On or about May 6, 2013, UCE-4599 provided JACKSON with a \$5,000 check made
22 payable to "Leland Yee Secretary of State." During a phone conversation with UCE-4599 on or about
23 May 9, 2013, YEE thanked UCE-4599 for his donation.

24 34. During a telephone conversation between YEE and JACKSON on or about July 4, 2013,
25 YEE expressed his expectation that UCE-4599 would provide more money to the Secretary of State
26 campaign.

27 35. On or about July 11, 2013, UCE-4599 provided JACKSON with a \$1,800 check made
28 payable to "Leland Yee Secretary of State."

1 Bribes Involving Medical Marijuana Legislation

2 36. In the spring of 2013, UCE-4180 met YEE and JACKSON and discussed his interest in
3 statewide legislation in California that would regularize the laws pertaining to medical marijuana. UCE-
4 4180 discussed particular provisions he wanted to see in statewide legislation that were consistent with
5 UCE-4180's business model. During these discussions, UCE-4180 also told YEE and JACKSON that
6 he would be willing to make donations to YEE's Secretary of State campaign in exchange for YEE's
7 efforts on UCE-4180's behalf.

8 37. On or about April 24, 2013, UCE-4180 told JACKSON that he wanted to make a small
9 donation to YEE's Secretary of State campaign to show good faith. The next day, April 25, 2013,
10 JACKSON sent a text message to UCE-4180 providing the account information for the Jackson
11 Consultancy bank account.

12 38. On or about April 29, 2013, UCE-4180 made a direct cash deposit of \$3,000 to
13 JACKSON's bank account.

14 39. In May 2013, CHS #11, a confidential human source working in an undercover capacity
15 for the FBI, asked YEE to contact another State Senator, hereafter referred to as State Senator 1, to
16 express support for medical marijuana legislation that would include features that would be helpful to
17 UCE-4180. CHS #11 offered to make a campaign donation in exchange for the contact.

18 40. During a subsequent telephone conversation between YEE and JACKSON, YEE told
19 JACKSON that he could make the call to State Senator 1. YEE instructed JACKSON to get campaign
20 donations from UCE-4180 and CHS #11.

21 41. During a meeting between YEE, JACKSON, UCE-4180, and others at a restaurant in
22 San Francisco on May 17, 2013, UCE-4180 reiterated the request that YEE contact State Senator 1.
23 YEE stated that he was not interested in making money, but wanted his friends to benefit from his work.
24 UCE-4180 gave YEE an envelope containing \$5,000 in cash.

25 42. On May 20, 2013, UCE-4180 spoke on the telephone with JACKSON and YEE, and
26 YEE provided UCE-4180 with an update on the status of two bills pertaining to medical marijuana that
27 were pending in the state legislature.

28 43. On June 20, 2013, in Sacramento, California, YEE introduced UCE-4180 to State

1 Senator 1 at a meeting also attended by JACKSON. YEE explained UCE-4180's interest in certain
2 provisions of statewide medical marijuana legislation and expressed support for the issue of medical
3 marijuana.

4 44. On June 22, 2013, YEE and JACKSON met with UCE-4180 in a hotel room in San
5 Francisco. UCE-4180 delivered an envelope containing \$11,000 cash and said that it was for the
6 meeting with State Senator 1. Before leaving the room, YEE prompted JACKSON to pick up the
7 envelope and take it with them.

8 45. During a conversation between YEE and JACKSON on July 15, 2013, YEE complained
9 to JACKSON about the small amount of money received from UCE-4180 "for all we've done," and
10 mentioned having set up the meeting for UCE-4180 with State Senator 1.

11 46. When JACKSON had a follow-up telephone conversation with UCE-4180 and asked for
12 more money, UCE-4180 expressed concern that he had not received much for his money thus far.

13 47. On August 26, 2013, YEE introduced UCE-4180 to another State Senator, hereafter
14 referred to as State Senator 2, whom YEE represented as having influence over medical marijuana
15 legislation. JACKSON was also present for the meeting. During the meeting, YEE advocated for the
16 provisions UCE-4180 wanted in the legislation.

17 48. On September 17, 2013, JACKSON and UCE-4180 met YEE at a restaurant in San
18 Francisco. UCE-4180 told YEE he was paying for the meetings and handed an envelope containing
19 \$10,000 cash to JACKSON.

20 All in violation of Title 18, United States Code, Section 1349.

21
22 COUNTS FORTY-FOUR THROUGH FORTY-NINE: (18 U.S.C. § § 1343, 1346 – Honest Services
23 Fraud)

24 1. Paragraphs 1 through 10 and paragraphs 13 through 48 of Count Forty-Two of this
25 indictment are hereby incorporated herein by reference into each of Counts Forty-Three through Forty-
26 Eight as if set forth fully herein.

27 2. On or about the respective dates shown below, each such date constituting a separate
28 count of this indictment, within the Northern District of California and elsewhere, the defendants,

1 LELAND YEE and
2 KEITH JACKSON,

3 and others known and unknown to the Grand Jury, knowingly and intentionally, having devised and
4 intending to devise a scheme and artifice to defraud the citizens of California of their right to the honest
5 services of State Senator LELAND YEE through bribery, for purposes of executing such scheme and
6 artifice, transmitted and caused to be transmitted by means of wire communication in interstate
7 commerce writings, signs, signals, pictures, and sounds, that is, the following:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE COMMUNICATION</u>
8 44	9/26/2012	Telephone call between JACKSON in the Northern District of California and UCE-4773 in Georgia
9 45	10/18/2012	Telephone call between YEE in the Northern District of California and UCE-4773 in Georgia
10 46	10/18/2012	Telephone call between YEE in the Northern District of California, UCE-4773 in Georgia, and UCE-4138 in Hawaii
11 47	4/25/2013	Text message between JACKSON, in the Northern District of California and UCE-4180 in Arizona
12 48	5/1/2013	Text message from JACKSON, in the Northern District of California, to UCE-4599 in California, routed through the state of Washington
13 49	5/20/13	Telephone call between YEE and JACKSON, in the Northern District of California, and UCE-4180 in Arizona

14 All in violation of Title 18, United States Code, Section 1343, 1346, and 2.

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22 COUNT FIFTY: (18 U.S.C. § 371 – Conspiracy)

23 From on or between March 4, 2014, to March 26, 2014, in the Northern District of California,
24 and elsewhere, the defendants,

25 LELAND YEE,
26 KEITH JACKSON, and
27 WILSON LIM,

28 knowingly and willfully conspired and agreed with each other and with others, known and unknown to

1 the Grand Jury, to commit offenses against the United States: that is,

- 2 (1) to engage in the business of dealing in firearms, not being a licensed dealer within the meaning
3 of Chapter 44, Title 18, United States Code, in violation of Title 18, United States Code, Section
4 922(a)(1); and
5 (2) to knowingly import or bring into the United States any firearm or ammunition, except as
6 provided in section 925(d) of Chapter 44 of Title 18, United States Code, in violation of Title 18,
7 United States Code, Section 922(l).

8 OVERT ACTS

9 In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt
10 acts, among others, were committed in the Northern District of California and elsewhere:

- 11 1. On or about March 4, 2014, the defendant KEITH JACKSON discussed LELAND YEE and
12 WILSON LIM providing weapons for sale and importation to the United States with an
13 undercover employee;
14 2. On or about March 5, 2014, the defendants LELAND YEE and KEITH JACKSON met with an
15 undercover employee and discussed defendant WILSON LIM as a source to sell weapons for
16 importation to the United States;
17 3. On or about March 11, 2014, the defendants LELAND YEE, KEITH JACKSON, and WILSON
18 LIM met with an undercover employee to discuss purchasing weapons from the Philippines to
19 import into the United States;
20 4. On or about March 14, 2014, the defendants LELAND YEE and KEITH JACKSON met with an
21 undercover employee and defendant LELAND YEE accepted \$6,800 in U.S. Currency along
22 with a list of weapons to pass to defendant WILSON LIM;

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1 5. On or about March 15, 2014, the defendant KEITH JACKSON accepted a copy of a list of
2 weapons to pass to defendant WILSON LIM.

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

4
5 DATED:

A TRUE BILL

6 *April 3, 2014*

7 *Nancy J. Peterson*
8 FOREPERSON

9 MELINDA HAAG
10 United States Attorney

11 *J. Douglas Wilson*
12 J. DOUGLAS WILSON
13 Chief, Criminal Division

14 (Approved as to form:

15 *SSB*
16 AUSA William Frentzen
AUSA Susan Badger
AUSA Waqar Hasib