

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 GUI YOU WU, :
 a/k/a "David," :
 a/k/a "Michael," :
 YOUMEI CHEN, :
 a/k/a "Ah Mei," :
 a/k/a "You Mei Chen," :
 GUIXIA WU, and :
 HONG ZHONG, :
 a/k/a "5023," :
 a/k/a "023," :
 :
 Defendants. :
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SEALED INDICTMENT

18 Cr. 159

COUNT ONE

(Mann Act and Travel Act Conspiracy)

The Grand Jury Charges:

1. Between in or about 2013 and in or about 2017, in the Southern District of New York and elsewhere, GUI YOU WU, a/k/a "David," a/k/a "Michael," YOUMEI CHEN, a/k/a "Ah Mei," a/k/a "You Mei Chen," GUIXIA WU, and HONG ZONG, a/k/a "5023," a/k/a "023," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other, to commit an offense against the United States, to wit, violations of Title 18, United States Code, Sections 2421(a) and 1952(a)(3).

2. It was a part and object of the conspiracy that GUI YOU WU, a/k/a "David," a/k/a "Michael," YOUMEI CHEN, a/k/a "Ah Mei," a/k/a "You Mei Chen," GUIXIA WU, and HONG ZONG, a/k/a "5023," a/k/a "023," the defendants, and others known and unknown, would and did knowingly transport an individual or individuals in interstate commerce with intent that such persons engage in prostitution, or any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421(a).

3. It was a part and object of the conspiracy that GUI YOU WU, a/k/a "David," a/k/a "Michael," YOUMEI CHEN, a/k/a "Ah Mei," a/k/a "You Mei Chen," GUIXIA WU, and HONG ZONG, a/k/a "5023," a/k/a "023," the defendants, and others known and unknown, would and did travel in interstate commerce, or cause someone else to travel in interstate commerce, or use or cause to be used the mail and facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, prostitution and promotion of prostitution, in violation of New York Penal Law §§ 230.00, 230.20, and 230.25, and thereafter would and did perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of

said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

Manner and Means of the Conspiracy

4. At all times relevant to this Indictment, GUI YOU WU, a/k/a "David," a/k/a "Michael," was the manager of a business engaged in the interstate trafficking of women, primarily Chinese nationals, for the purposes of prostitution (the "Prostitution Business").

5. As part of the Prostitution Business, GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, and others known and unknown, transported women for the purposes of prostitution to and from hotels and motels in multiple states, including New York, Connecticut, Delaware, Maryland, Virginia, Colorado, Missouri, and elsewhere, by means of vehicles and through the purchase of airline tickets.

6. The Prostitution Business recruited customers through the placement and purchase of advertisements for escort services on classified websites such as Backpage.com.

7. At all times relevant to this Indictment, YOUMEI CHEN, a/k/a "Ah Mei," a/k/a "You Mei Chen," GUIXIA WU, and HONG ZONG, a/k/a "5023," a/k/a "023," the defendants, assisted GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, in the promotion and management of the Prostitution Business through, among other things, payment for hotels and other business expenses,

placement of advertisements, coordination of travel, communication with women working as prostitutes, and the movement and receipt of proceeds from the Prostitution Business.

8. GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, employed several individuals as telephone operators for the Prostitution Business (the "Operators"). The Operators placed advertisements to recruit customers for the Prostitution Business and used cellphones to coordinate between the customers and the prostitutes.

9. At all times relevant to this Indictment, HONG ZONG, a/k/a "5023," a/k/a "023," the defendant, worked as an Operator for the Prostitution Business.

Overt Acts in Furtherance of the Conspiracy

10. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts were committed in the Southern District of New York and elsewhere:

a. On or about April 9, 2015, GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, transported a woman for the purposes of prostitution to a hotel located in Newburgh, New York.

b. On or about May 9, 2016, GUI YOU WU, a/k/a "David," a/k/a "Michael," and HONG ZHONG, a/k/a "5023," a/k/a "023," had a phone conversation in which they discussed, in substance and in part, how many customers the Prostitution

Business had in Manassas, Virginia; in Connecticut; and in St. Louis, Missouri. WU instructed ZHONG, in substance and in part, to place advertisements for the Prostitution Business.

c. On or about May 14, 2016, GUIXIA WU, the defendant, and GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, had a phone conversation in which GUIXIA WU told GUI YOU WU about a woman coming from China who could work as a prostitute for the Prostitution Business.

d. On or about June 2, 2016, YOUMEI CHEN, "Ah Mei," a/k/a "You Mei Chen," the defendant, informed GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, in substance and in part, that an individual working as a prostitute for the Prostitution Business was getting off the airplane and that WU should send her the address for the hotel. WU then sent a text message to CHEN containing the address for a hotel in Aurora, Colorado.

(Title 18, United States Code, Section 371).

COUNT TWO

(Mann Act)

The Grand Jury further charges:

11. The allegations set forth in paragraphs 1 through 10 of this Indictment are incorporated herein by reference and realleged as though fully set forth herein.

12. On or about February 25, 2016, in the Southern District of New York and elsewhere, GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, knowingly transported an individual in interstate commerce with the intent that said individual engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and aided and abetted such conduct, to wit, WU drove a woman from Flushing, New York, through the Southern District of New York, to a hotel in Chantilly, Virginia, with the intent that the woman would engage in prostitution.

(Title 18, United States Code, Sections 2421 and 2).

FORFEITURE ALLEGATIONS

13. As the result of committing the offense alleged in Count One of this Indictment, GUI YOU WU, a/k/a "David," a/k/a "Michael," YOUMEI CHEN, a/k/a "Ah Mei," a/k/a "You Mei Chen," GUIXIA WU, and HONG ZONG, a/k/a "5023," a/k/a "023," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2428, and Title 28, United States Code, Section 2461(c), any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitation the commission of said offense, including but not limited to a sum

of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendants personally obtained.

14. As the result of committing the offense alleged in Count Two of this Indictment, GUI YOU WU, a/k/a "David," a/k/a "Michael," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitation the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

Substitute Assets Provision

15. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

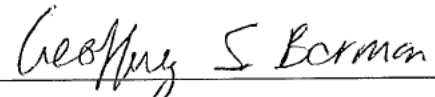
- d. has been substantially diminished in value; or
- e. has been commingled with other property which

cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

(Title 18, United States Code, Sections 981 and 2428;
Title 21, United States Code, Section 853;
Title 28, United States Code, Section 2461.)


FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

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"Michael," YOUMEI CHEN, a/k/a "Ah Mei,"
a/k/a "You Mei Chen," GUIXIA WU, and
HONG ZONG, a/k/a "5023," a/k/a "023,"


Defendants.

INDICTMENT

18 Cr.

(18 U.S.C. §§ 371, 1952, 2421, and 2.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson
