

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

APR 21 2026

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

LI SHUN CHEN,

a/k/a San Ge,

YING WANG,

HONG TAO ZHANG,

a/k/a Yi Di,

HAIJIAO LIN,

MEI JIN ZHOU,

a/k/a Sister Rong,

JIANDE LIN,

a/k/a Brother De,

GUANG ZHONG XIANG,

a/k/a Brother Zhong,

SHAO WEI NI,

a/k/a White Hair,

JUNTING LIU,

FENG PAN,

XIN XIANG CHEN,

a/k/a Fa Xing,

LI ZHONG ZHENG,

a/k/a Ah Di Mo,

REN AI ZHENG,

a/k/a Zheng Ren Ai,

GANGRONG CHEN,

RONGDI ZHENG,

a/k/a Ah Shou,

LIN FENG KE,

a/k/a Yi Kua,

WEIJING LIU,

a/k/a Sister Yi Kua,

MEIRONG HE,

a/k/a Michelle,

a/k/a Mi Xue,

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY aaa, DEPUTY

No.

CR 26-177

Violations: 21 U.S.C. § 846

21 U.S.C. § 856(a)(1)

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

21 U.S.C. § 843(b)

21 U.S.C. § 853

28 U.S.C. § 2461(c)

HUA CHEN,)
a/k/a Amy,)
JIN FU LIU,)
a/k/a Pang Pang,)
WENJIE YE,)
XIANG LING LIN,)
KONGJIE NI,)
MING ZHONG LIN,)
a/k/a Yi Zhong,)
WENZHI JIANG,)
XIAOFENG HUANG,)
XUI LONG LIN,)
JOHN LE,)
ALLEN MCGUIRE,)
JEAN BATISTA,)
TAYLOR OGLETREE,)
OMAR BENNETT,)
HENRY ALFARO,)
ALEJANDRO ALONSO,)
AMAYA VALDEZ,)
DYLAN RANGEL,)
BRADLEY RAY RICHARD,)
JERONIMO CRENSHAW,)
ARIEL SMITH-GREEN,)
JAMARIUS DAVIS,)
ZIYUAN LI,)
WENPING CHEN,)
GUOHUI DONG,)
DINGFU YANG,)
a/k/a Brother Fu,)
KEVIN ZHENG,)
SONG LIN,)
JING LIN,)
MENGJIN LIN,)
CHENGLONG DAI,)
HAI FENG CHEN, and)
MICHAEL BERHANE,)
Defendants.)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Drug Conspiracy)

From in or about March 2025, and continuing thereafter through on or about April 21, 2026, the exact timeframe being unknown to the Grand Jury, in the Western District of Oklahoma and elsewhere,

----- **LI SHUN CHEN,**
 a/k/a San Ge,
YING WANG,
HONG TAO ZHANG,
 a/k/a Yi Di,
HAIJIAO LIN,
MEI JIN ZHOU,
 a/k/a Sister Rong,
JIANDE LIN,
 a/k/a Brother De,
GUANG ZHONG XIANG,
 a/k/a Brother Zhong,
SHAO WEI NI,
 a/k/a White Hair,
JUNTING LIU,
FENG PAN,
XIN XIANG CHEN,
 a/k/a Fa Xing,
LI ZHONG ZHENG,
 a/k/a Ah Di Mo,
REN AI ZHENG,
 a/k/a Zheng Ren Ai,
GANGRONG CHEN,
RONGDI ZHENG,
 a/k/a Ah Shou,
LIN FENG KE,
 a/k/a Yi Kua,
WEIJING LIU,
 a/k/a Sister Yi Kua,
MEIRONG HE,

a/k/a Michelle,
a/k/a Mi Xue,
HUA CHEN,
a/k/a Amy,
JIN FU LIU,
a/k/a Pang Pang,
WENJIE YE,
XIANG LING LIN,
KONGJIE NI,
MING ZHONG LIN,
a/k/a Yi Zhong,
WENZHI JIANG,
XIAOFENG HUANG,
XUI LONG LIN,
JOHN LE,
ALLEN MCGUIRE,
JEAN BATISTA,
TAYLOR OGLETREE,
OMAR BENNETT,
HENRY ALFARO,
ALEJANDRO ALONSO,
AMAYA VALDEZ,
DYLAN RANGEL,
BRADLEY RAY RICHARD,
JERONIMO CRENSHAW,
ARIEL SMITH-GREEN,
JAMARIUS DAVIS,
ZIYUAN LI,
WENPING CHEN,
GUOHUI DONG,
DINGFU YANG,
a/k/a Brother Fu,
KEVIN ZHENG,
SONG LIN,
JING LIN,
MENGJIN LIN,
CHENGLONG DAI,
HAI FENG CHEN, and
MICHAEL BERHANE -----

knowingly and intentionally conspired, combined, confederated, and agreed with each other and with others, both known and unknown to the Grand Jury, to interdependently

manufacture, distribute, and possess with intent to distribute a controlled substance, including 1,000 or more marihuana plants and 1,000 kilograms or more of a mixture or substance containing a detectable amount of marihuana, both Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were accomplished by the following means, among others:

1. During the period of the conspiracy, **YING WANG** was a transporter and distributor of black-market marihuana who worked with multiple marihuana “brokers” who coordinated with black-market marihuana farms, that is farms operating outside of Oklahoma’s Medical Marihuana Regime, in order to distribute large quantities of marihuana on the black market, both inside and outside the state of Oklahoma.

2. These brokers included, but were not limited to, **LI SHUN CHEN, HONG TAO ZHANG, MING ZHONG LIN, XIANG LING LIN, KONGJIE NI, JIN FU LIU,** and **WENJIE YE** (collectively “the brokers”). The brokers sourced marihuana from various grows throughout the state and coordinated with individuals responsible for the grows in order to obtain the marihuana. The brokers worked with **YING WANG**, and other transporters, to deliver marihuana from grows to them, or directly to their customers for further distribution. Additionally, **YING WANG** transported directly for some individuals who operated marihuana grows, who did not utilize one of the brokers.

3. The owners/operators of the black-market marihuana grows included, but were not limited to, **JIANDE LIN, REN AI ZHENG, XIN XIANG CHEN, SHAO WEI**

NI, HAIJIAO LIN, MEI JIN ZHOU, GUANG ZHONG XIANG, FENG PAN, LI ZHONG ZHENG, and JUNTING LIU (collectively the “grow owners and operators”). During the course of the conspiracy, the grow owners and operators were responsible for the following grows: **JIANDE LIN** owned, operated, and managed Oscar Green LLC; **REN AI ZHENG** owned, operated, and managed Xing Ning LLC; **XIN XIANG CHEN** owned, operated, and managed DIHOW LLC; **SHAO WEI NI** owned, operated, and managed Organics Rising Sun LLC; **HAIJIAO LIN** and **MEI JIN ZHOU** owned, operated, and managed Kenny Lin LLC; **GUANG ZHONG XIANG** owned, operated, and managed DHA Enterprises LLC; **FENG PAN** owned, operated, and managed, HWY 7 Farm LLC; **JUNTING LIU** owned, operated, and managed Gecco Group LLC; and **LI ZHONG ZHENG** owned, operated, and managed KKT Grow LLC.

4. During the period of the conspiracy, the brokers and owners utilized transporters, including **YING WANG, XUI LONG LIN, WENZHI JIANG, and XIAOFENG HUANG** to deliver bulk marihuana to stash houses, including but not limited to 2305 Northwest 162nd Street, Edmond, Oklahoma and 16713 Autumnwood Drive, Edmond Oklahoma, or directly to customers. Occasionally, brokers would meet with transporters at public locations, switch vehicles, and the broker would deliver the marijuana to the stash house. Conversely, some customers utilized transporters that reported directly to them or personally traveled to meet with a broker and receive marihuana.

5. During the period of the conspiracy, **JOHN LE, ALLEN MCGUIRE, JEAN BATISTA, TAYLOR OGLETREE, OMAR BENNETT, HENRY ALFARO, ALEJANDRO ALONSO, AMAYA VALDEZ, DYLAN RANGEL, BRADLEY RAY**

RICHARD, JERONIMO CRENSHAW, ARIEL SMITH-GREEN, JAMARIUS DAVIS, ZIYUAN LI, WENPING CHEN, GUOHUI DONG, DINGFU YANG, KEVIN ZHENG, SONG LIN, JING LIN, MENGJIN LIN, CHENGLONG DAI, HAI FENG CHEN, and MICHAEL BERHANE were all customers who either acquire or intended to acquire marihuana in bulk to distribute to others, both inside and outside the state of Oklahoma. **JEAN BATISTA, HENRY ALFARO, and JERONIMO CRENSHAW** were out-of-state customers who directed others, including **TAYLOR OGLETREE, OMAR BENNETT, ALEJANDRO ALONSO, AMAYA VALDEZ, DYLAN RANGEL, and ARIEL SMITH-GREEN** to travel to Oklahoma to coordinate transporting or shipping the marihuana back to North Carolina, Texas, and Mississippi. **JOHN LE, ZIYUAN LI, GUOHUI DONG, and MICHAEL BERHANE** all traveled to Oklahoma at the direction of coconspirators, both known and unknown to the Grand Jury, in order to acquire marihuana and transport it out of the state for further distribution. **ALLEN MCGUIRE, BRADLEY RAY RICHARD, and JAMARIUS DAVIS** all traveled to Oklahoma in order to acquire marihuana and transport it out of the state for further distribution. **DINGFU YANG, KEVIN ZHENG, SONG LIN, JING LIN, MENGJIN LIN, CHENGLONG DAI, and HAI FENG CHEN** all acquired marihuana and intended to distribute it to others.

6. During the period of the conspiracy, **LI SHUN CHEN, HONG TAO ZHANG, GANGRONG CHEN, RONGDI ZHENG, WEIJING LIU, LIN FENG KE, MEIRONG HE, and HUA CHEN** shared in the profits from the illegal distribution of marihuana, and coordinated to transport and conceal the proceeds of the illegal distribution,

including through transporting bulk cash, and utilizing front businesses to disguise the nature of the proceeds.

7. During the period of the conspiracy, numerous coconspirators utilized electronic devices, including cellular telephones, to further the objectives of the conspiracy. Many of these conversations were intercepted by law enforcement over TT1, a phone belonging to **LI SHUN CHEN** and TT2, a phone belonging to **YING WANG**.

The Grand Jury incorporates by reference all statements and allegations contained in Counts 2 through 67, inclusive, as though fully set forth herein.

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 2
(Maintaining a Drug-Involved Premises)

From a date unknown to the grand jury, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **XIN XIANG CHEN,**
a/k/a Fa Xing, -----

knowingly and intentionally rented, used, and maintained a place at 19701 West South Avenue, Tonkawa, Oklahoma, for the purpose of unlawfully manufacturing, storing, and distributing marihuana plants and processed marihuana, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 3
(Maintaining a Drug-Involved Premises)

From a date unknown to the grand jury, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **SHAO WEI NI,**
a/k/a White Hair, -----

knowingly and intentionally rented, used, and maintained a place at 12482 U.S. Highway 177, Stratford, Oklahoma, for the purpose of unlawfully manufacturing, storing, and distributing marihuana plants and processed marihuana, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 4
(Maintaining a Drug-Involved Premises)

From a date unknown to the grand jury, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **HAIJIAO LIN and**
MEI JIN ZHOU,
a/k/a Sister Rong, -----

knowingly and intentionally rented, used, and maintained a place at 5821 Jesse Lane, Stillwater, Oklahoma, for the purpose of unlawfully manufacturing, storing, and distributing marihuana plants and processed marihuana, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 5
(Maintaining a Drug-Involved Premises)

From a date unknown to the grand jury, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **GUANG ZHONG XIANG,**
a/k/a Brother Zhong, -----

knowingly and intentionally rented, used, and maintained a place at 6925 U.S. Highway 81, Hennessey, Oklahoma, for the purpose of unlawfully manufacturing, storing, and distributing marihuana plants and processed marihuana, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 6
(Maintaining a Drug-Involved Premises)

From a date unknown to the grand jury, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **FENG PAN** -----

knowingly and intentionally rented, used, and maintained a place at 287128 State Highway 7, Duncan, Oklahoma, for the purpose of unlawfully manufacturing, storing, and distributing marihuana plants and processed marihuana, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 7
(Maintaining a Drug-Involved Premises)

From a date unknown to the grand jury, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **JUNTING LIU** -----

knowingly and intentionally rented, used, and maintained a place at 2099 County Street 2840, Chickasha, Oklahoma, for the purpose of unlawfully manufacturing, storing, and distributing marihuana plants and processed marihuana, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 8
(Maintaining a Drug-Involved Premises)

From a date unknown to the grand jury, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **LI ZHONG ZHENG,**
a/k/a Ah Di Mo, -----

knowingly and intentionally rented, used, and maintained a place at 11840 South Sooner Road, Edmond, Oklahoma, for the purpose of unlawfully manufacturing, storing, and distributing marihuana plants and processed marihuana, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 9
(Distribution of Marihuana)

On or about March 8, 2025, in the Western District of Oklahoma,

-----**LI SHUN CHEN,**
a/k/a San Ge, -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **ALLEN MCGUIRE**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 10
(Possession of Marihuana with Intent to Distribute)

On or about March 8, 2025, in the Western District of Oklahoma,

-----**ALLEN MCGUIRE** -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 11
(Distribution of Marihuana)

On or about September 19, 2025, in the Western District of Oklahoma,

-----**LI SHUN CHEN,**

**a/k/a San Ge, and
WENZHI JIANG** -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **BRADLEY RAY RICHARD**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 12
(Possession of Marihuana with Intent to Distribute)

On or about September 19, 2025, in the Western District of Oklahoma,

----- **BRADLEY RAY RICHARD** -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 13
(Distribution of Marihuana)

On or about January 18, 2026, in the Western District of Oklahoma,

----- **YING WANG and
XIANG LING LIN** -----

knowingly and intentionally distributed 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **GUOHUI DONG**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 14
(Possession of Marihuana with Intent to Distribute)

On or about January 18, 2026, in the Western District of Oklahoma,

----- **GUOHUI DONG** -----
knowingly and intentionally possessed with intent to distribute 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 15
(Distribution of Marihuana)

On or about January 21, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, -----
knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **TAYLOR OGLETREE**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 16
(Distribution of Marihuana)

On or about January 21, 2026, in the Western District of Oklahoma,

----- **TAYLOR OGLETREE** -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **OMAR BENNETT**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 17
(Possession of Marihuana with Intent to Distribute)

On or about January 21, 2026, in the Western District of Oklahoma,

----- **OMAR BENNETT** -----

knowingly and intentionally possessed with intent to distribute 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 18
(Unlawful Use of a Communication Facility)

From on or about January 28, 2026, through on or about January 29, 2026, in call numbers 3096, 3100, 3104, 3105, 3125, 3133, 3149, 3167, 3175, 3197, 3208, 3210, 3212, 3214, 3216, 3219, 3221, 3227, and 3229, intercepted on TT1, in the Western District of

Oklahoma,

**LI SHUN CHEN,
a/k/a San Ge,
YING WANG,
HONG TAO ZHANG,
a/k/a Yi Di, and
MING ZHONG LIN,
a/k/a Yi Zhong, ---**

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 19
(Distribution of Marihuana)

On or about January 29, 2026, in the Western District of Oklahoma,

**LI SHUN CHEN,
a/k/a San Ge,
YING WANG, and
HONG TAO ZHANG,
a/k/a Yi Di, -----**

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **MING ZHONG LIN**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 20
(Possession of Marihuana with Intent to Distribute)

On or about January 29, 2026, in the Western District of Oklahoma,

----- **MING ZHONG LIN,**
a/k/a Yi Zhong, -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 21
(Unlawful Use of a Communication Facility)

On or about February 5, 2026, in call numbers 20 and 43, intercepted on TT2, in the Western District of Oklahoma,

----- **YING WANG,**
WENJIE YE, and
WENPING CHEN -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 22
(Distribution of Marihuana)

On or about February 5, 2026, in the Western District of Oklahoma,

----- **YING WANG and**
WENJIE YE -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance to **WENPING CHEN**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 23
(Possession of Marihuana with Intent to Distribute)

On or about February 5, 2026, in the Western District of Oklahoma,

----- **WENPING CHEN** -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 24
(Unlawful Use of a Communication Facility)

On or about February 7, 2026, in call sessions 4316, 4343, 4346, 4347, 4349, 4354, 4356, 4359, 4370, 4388, and 4398, intercepted on TT1, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge,
HONG TAO ZHANG,
a/k/a Yi Di,
MING ZHONG LIN,
a/k/a Yi Zhong, and
XIAOFENG HUANG -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to

facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 25
(Distribution of Marihuana)

On or about February 7, 2026, in the Western District of Oklahoma,

----- **XIAOFENG HUANG** -----

knowingly and intentionally distributed 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **LI SHUN CHEN**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 26
(Possession of Marihuana with Intent to Distribute)

On or about February 7, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, -----

knowingly and intentionally possessed with intent to distribute 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 27
(Unlawful Use of a Communication Facility)

From on or about February 7, 2026, through on or about February 8, 2026, in call sessions 181, 223, 235, and 314, intercepted on TT2, in the Western District of Oklahoma,

----- **JUNTING LIU and**
YING WANG -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 28
(Distribution of Marihuana)

On or about February 8, 2026, in the Western District of Oklahoma,

----- **JUNTING LIU and**
YING WANG -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 29
(Distribution of Marihuana)

On or about February 12, 2026, in the Western District of Oklahoma,

----- **YING WANG** -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 30
(Possession of Marihuana with Intent to Distribute)

On or about February 18, 2026, in the Western District of Oklahoma,

----- **SONG LIN,**
JING LIN,
MENGJIN LIN,
CHENGLONG DAI, and
HAI FENG CHEN -----

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

COUNT 31
(Maintaining a Drug-Involved Premises)

From a date unknown to the Grand Jury, through on or about February 18, 2026, in the Western District of Oklahoma,

----- **SONG LIN,**
JING LIN,
MENGJIN LIN,
CHENGLONG DAI, and
HAI FENG CHEN -----

knowingly and intentionally rented, used, and maintained a place at 2701 South Ann Arbor Avenue, Oklahoma City, Oklahoma, for the purpose of unlawfully storing and distributing marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 32
(Unlawful Use of a Communication Facility)

From on or about February 11, 2026, through on or about February 12, 2026, in call sessions 5048, 5125, 5175, 5181, 5187, 5193, and 5197, intercepted on TT1, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, and
JAMARIUS DAVIS -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 33
(Distribution of Marihuana)

On or about February 12, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **JAMARIUS**

DAVIS.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 34
(Possession of Marihuana with Intent to Distribute)

On or about February 12, 2026, in the Western District of Oklahoma,

----- **JAMARIUS DAVIS** -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 35
(Unlawful Use of a Communication Facility)

From on or about February 8, 2026, through on or about February 13, 2026, in call sessions 4558, 5385, 5445, 5448, 5474, 5482, 5489, 5492, 5498, 5505, 5520, and 5542, intercepted on TT1, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, and
JERONIMO CRENSHAW -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 36
(Distribution of Marihuana)

On or about February 13, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **ARIEL SMITH-GREEN.**

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 37
(Possession of Marihuana with Intent to Distribute)

On or about February 13, 2026, in the Western District of Oklahoma,

----- **ARIEL SMITH-GREEN** -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 38
(Unlawful Use of a Communication Facility)

On or about February 13, 2026, in call sessions 5461, 5472, 5477, 5514, 5546, 5554, 5562, 5576, and 5579, intercepted on TT1, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge,

**HONG TAO ZHANG,
a/k/a Yi Di, and
XUI LONG LIN -----**

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

**COUNT 39
(Distribution of Marihuana)**

On or about February 13, 2026, in the Western District of Oklahoma,

----- **XUI LONG LIN** -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **LI SHUN CHEN**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

**COUNT 40
(Possession of Marihuana with Intent to Distribute)**

On or about February 13, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 41
(Unlawful Use of a Communication Facility)

On or about February 15, 2026, in call sessions 932, 980, 982, and 984, intercepted on TT2, in the Western District of Oklahoma,

----- **YING WANG,**
WENJIE YE, and
KEVIN ZHENG -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 42
(Distribution of Marihuana)

On or about February 15, 2026, in the Western District of Oklahoma,

----- **YING WANG and**
WENJIE YE -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **KEVIN ZHENG**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 43
(Possession of Marihuana with Intent to Distribute)

On or about February 15, 2026, in the Western District of Oklahoma,

----- **KEVIN ZHENG** -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 44
(Unlawful Use of a Communication Facility)

From on or about February 13, 2026, through on or about February 21, 2026, in call sessions 5548, 6663, 6695, 6698, 6716, 6755, 6861, 6867, 6869, 6871, 6873, and 6875, intercepted on TT1, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge,
HONG TAO ZHANG,
a/k/a Yi Di,
HENRY ALFARO, and
AMAYA VALDEZ -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 45
(Distribution of Marihuana)

On or about February 21, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge,
HONG TAO ZHANG,
a/k/a Yi Di, -----

knowingly and intentionally distributed 50 kilograms or more of a mixture or substance

containing a detectable amount of marihuana, a Schedule I controlled substance, to
AMAYA VALDEZ.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 46
(Possession of Marihuana with Intent to Distribute)

On or about February 21, 2026, in the Western District of Oklahoma,

----- **AMAYA VALDEZ** -----

knowingly and intentionally possessed with intent to distribute 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 47
(Unlawful Use of a Communication Facility)

On or about February 21, 2026, in call sessions 6726, 6736, 6744, 6772, 6813, and 6816, intercepted on TT1, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge,
HONG TAO ZHANG,
a/k/a Yi Di, and
MING ZHONG LIN,
a/k/a Yi Zhong, -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to

facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 48
(Distribution of Marihuana)

On or about February 21, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **MING ZHONG LIN**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 49
(Possession of Marihuana with Intent to Distribute)

On or about February 21, 2026, in the Western District of Oklahoma,

----- **MING ZHONG LIN,**
a/k/a Yi Zhong, -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 50
(Unlawful Use of a Communication Facility)

On or about February 23, 2026, in call sessions 7088, 7090, 7107, 7132, 7134, 7137, 7139, 7144, and 7151, intercepted on TT1, in the Western District of Oklahoma,

LI SHUN CHEN,
a/k/a San Ge,
HONG TAO ZHANG,
a/k/a Yi Di, and
ZIYUAN LI -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 51
(Distribution of Marihuana)

On or about February 23, 2026, in the Western District of Oklahoma,

ZIYUAN LI

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **LI SHUN CHEN**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 52
(Possession of Marihuana with Intent to Distribute)

On or about February 23, 2026, in the Western District of Oklahoma,

LI SHUN CHEN,
a/k/a San Ge, --

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 53
(Unlawful Use of a Communication Facility)

On or about February 24, 2026, in call sessions 1789, 1791, 1794, 1802, 1803, and 1814, intercepted on TT2, in the Western District of Oklahoma,

----- **YING WANG,**
JIN FU LIU,
a/k/a Pang Pang,
XIANG LING LIN, and
KONGJIE NI -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 54
(Distribution of Marihuana)

On or about February 24, 2026, in the Western District of Oklahoma,

----- **YING WANG,**
JIN FU LIU,
a/k/a Pang Pang, and
XIANG LING LIN -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **KONGJIE NI**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 55
(Possession of Marihuana with Intent to Distribute)

On or about February 24, 2026, in the Western District of Oklahoma,

----- **KONGJIE NI** -----
knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 56
(Unlawful Use of a Communication Facility)

On or about February 26, 2026, in call sessions 2012, 2015, 2022, and 2027, intercepted on TT2, in the Western District of Oklahoma,

----- **YING WANG,**
WENJIE YE, and
DINGFU YANG,
a/k/a Brother Fu, -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 57
(Distribution of Marihuana)

On or about February 26, 2026, in the Western District of Oklahoma,

----- **YING WANG and**
WENJIE YE -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **DINGFU YANG**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 58
(Possession of Marihuana with Intent to Distribute)

On or about February 26, 2026, in the Western District of Oklahoma,

----- **DINGFU YANG,**
a/k/a Brother Fu, -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 59
(Distribution of Marihuana)

On or about February 27, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, -----

knowingly and intentionally distributed a quantity of a mixture or substance containing a

detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 60
(Possession of Marihuana with Intent to Distribute)

On or about February 27, 2026, in the Western District of Oklahoma,

----- **JOHN LE** -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(D).

COUNT 61
(Unlawful Use of a Communication Facility)

From on or about March 5, 2026, through on or about March 7, 2026, in call sessions 2320, 2394, 2426, 2432, 2433, 2455, and 2459, intercepted on TT2, in the Western District of Oklahoma,

----- **YING WANG and**
XIANG LING LIN -----

knowingly and intentionally used a communication facility, that is a cellular telephone, to facilitate the distribution of marihuana, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 62
(Distribution of Marihuana)

On or about March 7, 2026, in the Western District of Oklahoma,

----- **YING WANG and**
XIANG LING LIN -----

knowingly and intentionally distributed 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, to **MICHAEL BERHANE**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 63
(Possession of Marihuana with Intent to Distribute)

On or about March 7, 2026, in the Western District of Oklahoma,

----- **MICHAEL BERHANE** -----

knowingly and intentionally possessed with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

COUNT 64
(Possession of Marihuana with Intent to Distribute)

On or about March 13, 2026, in the Western District of Oklahoma,

----- **WENPING CHEN** -----

knowingly and intentionally possessed with intent to distribute 50 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 65
(Maintaining a Drug-Involved Premises)

On or about March 13, 2026, in the Western District of Oklahoma,

----- **WENPING CHEN** -----

knowingly and intentionally rented, used, and maintained a place at 4317 Northwest 39th Street, Units 112 and 212, Oklahoma City, Oklahoma, for the purpose of unlawfully storing and distributing marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 66
(Maintaining a Drug-Involved Premises)

From in or around January 2026, through on or about April 21, 2026, in the Western District of Oklahoma,

----- **LI SHUN CHEN,**
a/k/a San Ge, and
HONG TAO ZHANG,
a/k/a Yi Di, -----

knowingly and intentionally rented, used, and maintained a place at, 2305 NW 162nd Street, Edmond, Oklahoma, for the purpose of unlawfully storing and distributing

marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

COUNT 67
(Maintaining a Drug-Involved Premises)

From in or around January 2026, through on or about April 21, 2026, in the Western District of Oklahoma,

-----LI SHUN CHEN,
a/k/a San Ge, and
HONG TAO ZHANG,
a/k/a Yi Di, -----

knowingly and intentionally rented, used, and maintained a place at 16713 Autumnwood Drive, Edmond, Oklahoma, for the purpose of unlawfully storing and distributing marihuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1), the penalty for which is found at Title 21, United States Code, Section 856(b).

FORFEITURE

The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of any of the offenses alleged in Counts 1, 9, 11, 15, 18, 19, 24, 26, 32, 33, 35, 36, 38, 40, 44, 45, 47, 48, 50, 52, 59, 66, and 67 of this Indictment, **LI SHUN CHEN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission

of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 13, 18, 19, 21, 22, 27, 28, 29, 41, 42, 53, 54, 56, 57, 61, and 62 of this Indictment, **YING WANG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 18, 19, 24, 38, 44, 45, 47, 50, 66, and 67 of this Indictment, **HONG TAO ZHANG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 4 of this Indictment, **HAIJIAO LIN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 4 of this Indictment, **MEI JIN ZHOU** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of the offense alleged in Count 1 of this Indictment, **JIANDE LIN**

shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of any of the offenses alleged in Counts 1 and 5 of this Indictment, **GUANG ZHONG XIANG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 3 of this Indictment, **SHAO WEI NI** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 7, 27, and 28 of this Indictment, **JUNTING LIU** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 6 of this Indictment, **FENG PAN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property

used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 2 of this Indictment, **XIN XIANG CHEN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 8 of this Indictment, **LI ZHONG ZHENG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of the offense alleged in Count 1 of this Indictment, **REN AI ZHENG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 1 of this Indictment, **GANGRONG CHEN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 1 of this Indictment, **RONGDI ZHENG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 1 of this Indictment, **LIN FENG KE** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 1 of this Indictment, **WEIJING LIU** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 1 of this Indictment, **MEIRONG HE** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 1 of this Indictment, **HUA CHEN** shall forfeit to the United States any property constituting or derived from any proceeds

obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of any of the offenses alleged in Counts 1, 53, and 54 of this Indictment, **JIN FU LIU** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 21, 22, 41, 42, 56, and 57 of this Indictment, **WENJIE YE** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 13, 53, 54, 61, and 62 of this Indictment, **XIANG LING LIN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 53, and 55 of this Indictment, **KONGJIE NI** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to

facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 18, 20, 24, 47, and 49 of this Indictment, **MING ZHONG LIN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 11 of this Indictment, **WENZHI JIANG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 24, and 25 of this Indictment, **XIAOFENG HUANG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 38, and 39 of this Indictment, **XUI LONG LIN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 60 of this Indictment,

JOHN LE shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 10 of this Indictment, **ALLEN MCGUIRE** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of the offense alleged in Count 1 of this Indictment, **JEAN BATISTA** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of any of the offenses alleged in Counts 1 and 16 of this Indictment, **TAYLOR OGLETREE** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 17 of this Indictment, **OMAR BENNETT** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any

property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 44 of this Indictment, **HENRY ALFARO** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of the offense alleged in Count 1 of this Indictment, **ALEJANDRO ALONSO** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of any of the offenses alleged in Counts 1, 44, and 46 of this Indictment, **AMAYA VALDEZ** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of the offense alleged in Count 1 of this Indictment, **DYLAN RANGEL** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of any of the offenses alleged in Counts 1 and 12 of this Indictment, **BRADLEY RAY RICHARD** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 35 of this Indictment, **JERONIMO CRENSHAW** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 27 of this Indictment, **ARIEL SMITH-GREEN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 32, and 34 of this Indictment, **JAMARIUS DAVIS** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 50, and 51 of this Indictment, **ZIYUAN LI** shall forfeit to the United States any property constituting or

derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 21, 23, 64, and 65 of this Indictment, **WENPING CHEN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 14 of this Indictment, **GUOHUI DONG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 56, and 58 of this Indictment, **DINGFU YANG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 41, and 43 of this Indictment, **KEVIN ZHENG** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to

facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 30, and 31 of this Indictment, **SONG LIN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 30, and 31 of this Indictment, **JING LIN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 30, and 31 of this Indictment, **MENGJIN LIN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 30, and 31 of this Indictment, **CHENGLONG DAI** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1, 30, and 31 of this

Indictment, **HAI FENG CHEN** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Upon conviction of any of the offenses alleged in Counts 1 and 63 of this Indictment, **MICHAEL BERHANE** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense(s), and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense(s).

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), **LI SHUN CHEN, YING WANG, HONG TAO ZHANG, HAIJIAO LIN, MEI JIN ZHOU, JIANDE LIN, GUANG ZHONG XIANG, SHAO WEI NI, JUNTING LIU, FENG PAN, XIN XIANG CHEN, LI ZHONG ZHENG, REN AI ZHENG, GANGRONG CHEN, RONGDI ZHENG, LIN FENG KE, WEIJING LIU, MEIRONG HE, HUA CHEN, JIN FU LIU, WENJIE YE, XIANG LING LIN, KONGJIE NI, MING ZHONG LIN, WENZHI JIANG, XIAOFENG HUANG, XUI LONG LIN, JOHN LE, ALLEN MCGUIRE, JEAN BATISTA, TAYLOR OGLETREE, OMAR BENNETT, HENRY ALFARO, ALEJANDRO ALONSO, AMAYA VALDEZ, DYLAN RANGEL, BRADLEY RICHARD, JERONIMO CRENSHAW, ARIEL SMITH-GREEN, JAMARIUS DAVIS, ZIYUAN LI, WENPING CHEN, GUOHUI DONG, DINGFU YANG, KEVIN ZHENG, SONG LIN, JING LIN, MENGJIN LIN, CHENGLONG DAI, HAI**

FENG CHEN, and **MICHAEL BERHANE** shall forfeit any other property belonging to them, up to the value of the property described above which was obtained by the defendant(s) as a result of the offense(s), if, by any act or omission of the defendant(s), the property described above, or any portion thereof, cannot be located upon the exercise of due diligence, has been transferred, sold to, or deposited to a third party; has been placed beyond the jurisdiction of the court, has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

The property subject to forfeiture includes, but is not limited to:

1. real property located at 8220 North Classen Boulevard, Oklahoma City, Oklahoma;
2. real property located at 2116 South Woody Guthrie Street, Okemah, Oklahoma;
3. real property located at 2405 South Woody Guthrie Street, Okemah, Oklahoma;
5. real property located at 5821 Jesse Lane, Stillwater, Oklahoma;
6. real property located at 6925 U.S. Highway 81, Hennessey, Oklahoma;
7. real property located at 897 County Road 1310, Chickasha, Oklahoma;
8. real property located at 12482 U.S. Highway 177, Stratford, Oklahoma;
9. real property located at 13783 County Road 3295, Pauls Valley, Oklahoma;
10. real property located at 23946 East County Road 1630, Elmore City, Oklahoma;
11. real property located at 7865 Hornbeam Road, Henryetta, Oklahoma;

12. real property located at 106191 North 3800 Road, Okemah, Oklahoma;
13. real property located at 19701 West South Avenue, Tonkawa, Oklahoma;
14. real property located at 338181 East Highway 105, Tryon, Oklahoma;
15. real property located at 99170 North 3620 Road, Paden, Oklahoma;
16. real property located at 35512 EW 1170 Road, Seminole, Oklahoma;
17. real property located at 16901 Box Road, Lexington, Oklahoma;
18. real property located at 366021 U.S. Highway 62, Boley, Oklahoma;
19. real property located at 2099 County Street 2840, Chickasha, Oklahoma;
20. real property located at 287128 State Highway 7, Duncan, Oklahoma 73533;
21. real property located at 11840 South Sooner Road, Edmond, Oklahoma;
22. real property located at 35900 East Highway 270, Seminole, Oklahoma;
23. real property located at 4260 Diagonal 3828 Road, Stuart, Oklahoma;
24. real property located at 9721 Red Gate Ranch Road, Wynnewood, Oklahoma;
25. real property located at 6513 Northwest 150th Terrace, Oklahoma City, Oklahoma; and
26. real property located at 11774 North 3570 Road, Seminole, Oklahoma.

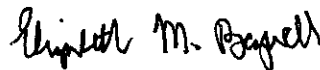
All pursuant to Title 21, United States Code, Section 853 and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

A handwritten signature, likely of the foreperson of the grand jury, consisting of a stylized 'N' followed by a long, wavy horizontal line.

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
United States Attorney


ELIZABETH M. BAGWELL
Assistant United States Attorney