


Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington  
October 14, 2020  
WILLIAM M. McCOOL, Clerk  
By  Deputy

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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

WEI QUAN WU and  
DA BIAO WU,

Defendants.

No. **CR20-173 RAJ**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Manufacture and Distribute Marihuana)**

Beginning at a time unknown and continuing until on or about October 14, 2020, in King County, within the Western District of Washington, and elsewhere, WEI QUAN WU, DA BIAO WU, and others known and unknown, did knowingly and intentionally conspire to manufacture, distribute, and possess with intent to distribute, marihuana, a substance controlled under Title 21, United States Code, Section 812, Schedule I.

With respect to WEI QUAN WU and DA BIAO WU, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 1,000 or more marihuana plants regardless of weight and 100 kilograms or more of a mixture or substance

1 containing a detectable amount of marihuana, in violation of Title 21, United States  
2 Code, Sections 841(b)(1)(A) and 841(b)(1)(B).

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

5  
6 **COUNT 2**

7 **(Possession with Intent to Distribute Marihuana)**

8 **(1755 NE 48th St, Renton, Washington)**

9 On or about February 27, 2018, in King County, within the Western District of  
10 Washington, and elsewhere, the defendant WEI QUAN WU, knowingly and  
11 intentionally possessed with intent to distribute, and did aid and abet the possession with  
12 intent to distribute, marihuana, a substance controlled under Title 21, United States Code,  
13 Section 812, Schedule I.

14 The Grand Jury further alleges that the offense involved 100 kilograms or more of  
15 a mixture or substance containing a detectable amount of marihuana.

16 The Grand Jury further alleges that this offense was committed during and in  
17 furtherance of the conspiracy charged in Count 1, above.

18 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),  
19 and Title 18, United States Code, Section 2.

20  
21 **COUNT 3**

22 **(Manufacturing and Possessing with Intent to Distribute Marihuana)**

23 **(310 Seattle Blvd S, Pacific, Washington)**

24 On or about February 27, 2018, in King County, within the Western District of  
25 Washington, and elsewhere, the defendant WEI QUAN WU, knowingly and  
26 intentionally manufactured and possessed with intent to distribute, and did aid and abet  
27 the manufacture of and possession with intent to distribute, marihuana, a substance  
28 controlled under Title 21, United States Code, Section 812, Schedule I.

1 The Grand Jury further alleges that the offense involved 100 or more marihuana  
2 plants regardless of weight.

3 The Grand Jury further alleges that this offense was committed during and in  
4 furtherance of the conspiracy charged in Count 1, above.

5 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),  
6 and Title 18, United States Code, Section 2.

7  
8 **COUNT 4**

9 **(Manufacturing and Possessing with Intent to Distribute Marihuana)**

10 **(14310 176th Ave SE, Renton, Washington)**

11 On or about February 27, 2018, in King County, within the Western District of  
12 Washington, and elsewhere, the defendant WEI QUAN WU, knowingly and  
13 intentionally manufactured and possessed with intent to distribute, and did aid and abet  
14 the manufacture of and possession with intent to distribute, marihuana, a substance  
15 controlled under Title 21, United States Code, Section 812, Schedule I.

16 The Grand Jury further alleges that the offense involved 100 or more marihuana  
17 plants regardless of weight.

18 The Grand Jury further alleges that this offense was committed during and in  
19 furtherance of the conspiracy charged in Count 1, above.

20 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),  
21 and Title 18, United States Code, Section 2.

22  
23 **COUNT 5**

24 **(Manufacturing and Possessing with Intent to Distribute Marihuana)**

25 **(3400 SE 16th Pl, Renton, Washington)**

26 On or about February 27, 2018, in King County, within the Western District of  
27 Washington, and elsewhere, the defendant WEI QUAN WU, knowingly and

28 intentionally manufactured and possessed with intent to distribute, and did aid and abet

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UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 the manufacture of and possession with intent to distribute, marihuana, a substance  
2 controlled under Title 21, United States Code, Section 812, Schedule I.

3 The Grand Jury further alleges that the offense involved 100 or more marihuana  
4 plants regardless of weight.

5 The Grand Jury further alleges that this offense was committed during and in  
6 furtherance of the conspiracy charged in Count 1, above.

7 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),  
8 and Title 18, United States Code, Section 2.

9  
10 **COUNT 6**

11 **(Manufacturing and Possessing with Intent to Distribute Marihuana)**

12 **(30114 32<sup>nd</sup> Ave S, Auburn, Washington)**

13 On or about February 27, 2018, in King County, within the Western District of  
14 Washington, and elsewhere, the defendant DA BIAO WU, knowingly and intentionally  
15 manufactured and possessed with intent to distribute, and did aid and abet the  
16 manufacture of and possession with intent to distribute, marihuana, a substance  
17 controlled under Title 21, United States Code, Section 812, Schedule I.

18 The Grand Jury further alleges that the offense involved 100 or more marihuana  
19 plants regardless of weight.

20 The Grand Jury further alleges that this offense was committed during and in  
21 furtherance of the conspiracy charged in Count 1, above.

22 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),  
23 and Title 18, United States Code, Section 2.

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Indictment

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SEATTLE, WASHINGTON 98101  
(206) 553-7970

**COUNT 7**

**(Possession with Intent to Distribute Marihuana)  
(4041 124th Ave SE, Bellevue, Washington)**

On or about February 27, 2018, in King County, within the Western District of Washington, and elsewhere, the defendant DA BIAO WU, knowingly and intentionally possessed with intent to distribute, and did aid and abet the possession with intent to distribute, marihuana, a substance controlled under Title 21, United States Code, Section 812, Schedule I.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

**ASSET FORFEITURE ALLEGATIONS**

All of the allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, the defendants WEI QUAN WU and DA BIAO WU shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes but is not limited to:

- a. the real property located at 310 Seattle Boulevard South, Pacific, Washington, titled to Wei Quan Wu; and,
- b. the real property located at 3260 South 301st Place, Auburn, Washington (*aka* 30114 32nd Avenue South, Auburn, Washington), titled to Da Biao Wu.

Upon conviction of the offense alleged in Count 3, the defendant WEI QUAN WU shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853,

1 any property that constitutes or is traceable to proceeds of the offense, as well as any  
2 property that facilitated the offense. This property includes but is not limited to:

- 3 a. the real property located at 310 Seattle Boulevard South, Pacific, Washington,  
4 titled to Wei Quan Wu.

5 Upon conviction of any of the offenses alleged in Counts 2, 4, 5, 6, and 7, the  
6 relevant defendant shall forfeit to the United States, pursuant to Title 21, United States  
7 Code, Section 853, any property that constitutes or is traceable to proceeds of the offense,  
8 as well as any property that facilitated the offense.

9 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
10 any act or omission of the relevant defendant,

- 11 a. cannot be located upon the exercise of due diligence;  
12 b. has been transferred or sold to, or deposited with, a third party;  
13 c. has been placed beyond the jurisdiction of the Court;  
14 d. has been substantially diminished in value; or,  
15 e. has been commingled with other property which cannot be divided without  
16 difficulty;

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Indictment

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SEATTLE, WASHINGTON 98101  
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1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title  
3 21, United States Code, Section 853(p).

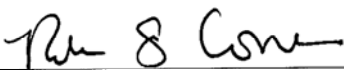
4 A TRUE BILL:

5  
6 DATED: 10/14/20

7 *Signature of the Foreperson redacted*  
8 *pursuant to the policy of the Judicial*  
9 *Conference of the United States*

10 \_\_\_\_\_  
11 FOREPERSON

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14 \_\_\_\_\_  
15 BRIANT T. MORAN  
16 United States Attorney

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19 VINCENT T. LOMBARDI  
20 Assistant United States Attorney

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22 \_\_\_\_\_  
23 NICHOLAS MANHEIM  
24 Assistant United States Attorney