

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on May 11, 2006

UNITED STATES OF AMERICA

v.

ZHENLI YE GON

Defendant.

CRIMINAL NO. **07-181**
Mag No. 07-301
GRAND JURY ORIGINAL

VIOLATIONS:

-) 21 U.S.C. §963 and 959
-) Conspiracy to Aid and Abet
-) The Manufacture of 500
-) Grams or More of
-) Methamphetamine
-) Knowing or
-) Intending that It Will
-) Be Unlawfully Imported
-) Into The United States
-) 18 U.S.C. §2
-) 21 U.S.C. §853
-) 21 U.S.C. §970
-) (Forfeiture)

SULLIVAN, J. EGS

The Grand Jury charges that:

INDICTMENT

FILED IN OPEN COURT

COUNT ONE

JUL 26 2007

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

From in or about 1999, the exact date being unknown to the Grand Jury, and continuing thereafter up to and including the date of the filing of this Indictment, in the countries of Mexico, El Salvador, the United States, and elsewhere, the defendant, ZHENLI YE GON, and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other, and with other co-conspirators unknown to the Grand Jury, to commit the following

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offense against the United States: to aid and abet in the manufacture of 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, intending and knowing that it would be unlawfully imported into the United States from Mexico, and elsewhere, outside of the United States, in violation of Title 21, United States Code, Sections 959 and 960. All in Violation of Title 21, United States Code, Sections 959, 963 and 960, and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

Upon conviction of the criminal violations alleged in Count 1 of this Indictment, said offenses being punishable by imprisonment for more than one year, the defendant, ZHENLI YE GON, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all respective right, title, or interest which the defendant may have in:

- (1) any and all money and/or property constituting, or derived from, any proceeds which said defendants obtained, directly or indirectly, as the result of the violations alleged in Count 1 of this Indictment; and
- (2) any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations alleged in Count 1 of this Indictment, together with all interest and proceeds traceable thereto, in that said property constitutes or was derived from proceeds said defendants obtained as a result of the violations charged in Count 1 of the Indictment, and is property which was used or intended to be used to facilitate said violations:

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

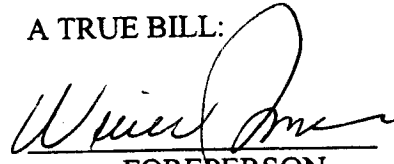
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraphs 1 and 2 above.

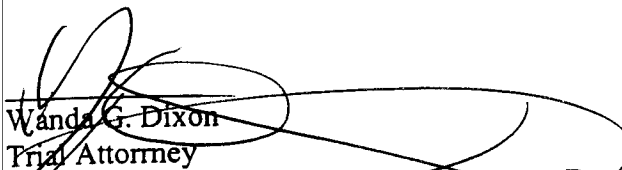
(Criminal Forfeiture, pursuant to Title 21, United States Code, Sections 853 and 970).

A TRUE BILL:

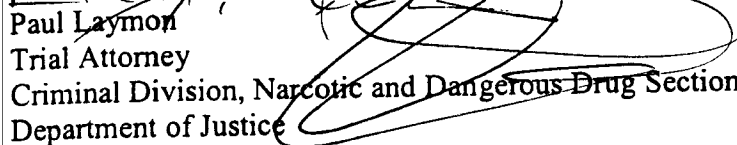

FOREPERSON.

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