

may be used to manufacture a controlled substance, knowing, intending, and having reasonable cause to believe, that it will be used to manufacture a controlled substance, in violation of Title 21, United States Code, Sections 846 and 843(a)(7).

COUNT TWO

(21 U.S.C. §§ 846 and 843(a)(5))

Beginning on or about May 19, 2015, and continuing through on or about October 29, 2024, in the Western District of Texas, the Southern District of Florida, and elsewhere,

XIAOFEI CHEN

a/k/a “Sophie Chen” and “陈晓飞”

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to commit an offense against the United States, in violation of Title 21, United States Code, Section 846, that is, the Defendant conspired to distribute any die and other thing designed to print, imprint and reproduce the trademark, trade name, and other identifying mark and imprint of another and any likeness of any of the foregoing upon any drug and labeling thereof so as to render such drug a counterfeit substance, in violation of Title 21, United States Code, Sections 846 and 843(a)(5).

COUNT THREE

(18 U.S.C. § 1956(h) and (a)(2)(A))

Beginning on or about May 19, 2015, continuing through on or about October 29, 2024, in the Western District of Texas, the Southern District of Florida, and elsewhere,

XIAOFEI CHEN

a/k/a “Sophie Chen” and “陈晓飞”

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to commit an offense against the United States, in violation of Title 18, United States Code, Section 1956(h), that is, the Defendant conspired to transport, transmit, and transfer, and attempted to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, to wit the violation

of Title 21, United States Code, Sections 846, 843(a)(5), and 843(a)(7), in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(h).

NOTICE OF GOVERNMENT’S DEMAND FOR FORFEITURE

[See Fed. R. Crim. 32.2]

I.

Drug Violation and Forfeiture Statutes

**[Title 21 U.S.C. §§ 846, 843(a)(5) and 843(a)(7), subject to forfeiture
pursuant to Title 21 U.S.C. §§ 853(a)(1) and (2)]**

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States gives notice to Defendant **XIAOFEI CHEN** a/k/a “Sophie Chen” and “陈晓飞” of its intent to seek the forfeiture of the property described below upon conviction pursuant to Fed R. Crim. P. 32.2 and Title 21 U.S.C. §§ 853(a)(1) and (2), which state:

Title 21 U.S.C. § 853. Criminal Forfeitures

(a) Property subject to criminal forfeiture

- (1)** any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2)** any of the person’s property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

II.

Money Laundering Violation and Forfeiture Statutes

**[Title 18 U.S.C. §§ 1956(a)(2)(A) and 1956(h),
subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1)]**

As a result of the criminal violations set forth in Count Three, the United States gives notice to Defendant **XIAOFEI CHEN** a/k/a “Sophie Chen” and “陈晓飞” of its intent to seek the forfeiture of the property described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 982(a)(1), which state:

18 U.S.C. § 982. Criminal Forfeiture.


- (a)(1)** The court, in imposing sentence on a person convicted of an offense in violation of section 1956 . . . of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the Property described in Paragraph III.

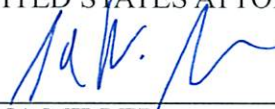
III.
Property

1. Apple iPhone 15 Pro, which bears the IMEI: 358301855756151;
2. Any and all property, real or personal involved in or used in the commission of the criminal offense; and
3. Any and all accessories involved in or used in the commission of the criminal offenses.

AMANDA LISKAMM
DIRECTOR
U.S. DEPARTMENT OF JUSTICE
CONSUMER PROTECTION BRANCH

By: 
COLIN W. TRUNDLE
EDWARD E. EMOKPAE
SCOTT B. DAHLQUIST
CADESBY COOPER
KAITLIN SAHNI
Trial Attorneys

MARGARET F. LEACHMAN
ACTING UNITED STATES ATTORNEY

BY: 
DONNA MILLER
LAURA GREGORY
STEVEN SPITZER
Assistant United States Attorneys