

FILED

11-18-11

CLERK, U. S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

CHIN SHIH CHOU
a/k/a "Jeff"
QIAO CHU
a/k/a "Dott"
WEI TANG LO
a/k/a "Danny"
a/k/a "Larry Law"
a/k/a "David Lo"

CASE NO. 3:11-cr-286-J-34TEM
Ct. 1: 18 U.S.C. §§ 545 and 2
Forfeiture: 18 U.S.C. § 982(a)(2)(B),
18 U.S.C. § 545 and
28 U.S.C. §2461(c)

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning at a time unknown, but at least by August 2011, and continuing until on or about November 16, 2011, in Duval county, Middle District of Florida, and elsewhere,

CHIN SHIH CHOU,
a/k/a "Jeff,"
QIAO CHU,
a/k/a "Dott,"
WEI TANG LO,
a/k/a "Danny"
a/k/a "Larry Law,"
a/k/a "David Lo,"

the defendants herein, knowingly and willfully and with intent to defraud the United States, did smuggle and clandestinely introduce into the United States merchandise which should have been invoiced; that is, honey with a country of origin of China, of an

approximate value exceeding \$1 million.

All in violation of Title 18, United States Code, Sections 545 and 2.

FORFEITURE

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(B) and Title 18, United States Code, Section 545 and 28 U.S.C. § 2461(c).

2. Upon conviction of one or more of the offenses alleged in Count One of this Indictment, the defendants, CHIN SHIH CHOU, a/k/a "Jeff," QIAO CHU, a/k/a "Dott," WEI TANG LO, a/k/a "Danny," a/k/a Larry Law, a/k/a David Lo, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the smuggling offense, including, but not limited to, the following:

- a. A sum of money representing the amount of proceeds obtained as a result of the smuggling offense, 18 U.S.C. § 545.

3. Upon conviction of one or more of the offense alleged in Count One of this Indictment the defendants, CHIN SHIH CHOU, a/k/a "Jeff," QIAO CHU, a/k/a "Dott," WEI TANG LO, a/k/a "Danny," a/k/a Larry Law, a/k/a David Lo, shall forfeit, pursuant to 18 U.S.C. § 545 and 28 U.S.C. § 2461(c), any merchandise introduced into the United States in violation of 18 U.S.C. § 545, or the value thereof, including but not limited to the following:

- a. 1,600 barrels of honey seized on November 15, 2011 in Jacksonville, Florida;
- b. 1,728 barrels of honey seized on November 10, 2011 in Savannah,

Georgia;

- c. 640 barrels of honey seized on November 14, 2011 in Wilmington, North Carolina;**
- d. 128 barrels of honey pending seizure in Miami, Florida;**
- e. 320 barrels pending seizure in Jacksonville, Florida; and**
- f. 128 barrels pending seizure in Houston, Texas.**

4 If any of the property described above, 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;**

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson


ROBERT E. O'NEILL
United States Attorney

By:



RUSSELL C. STODDARD
Assistant United States Attorney

By:



MAC D. HEAVENER, III
Assistant United States Attorney
Deputy Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division
THE UNITED STATES OF AMERICA

VS.

CHIN SHIH CHOU,
a/k/a "Jeff"
QIAO CHU,
a/k/a "Dot"
WEITANG LO,
a/k/a "Danny"
a/k/a "Larry Law"
a/k/a "David Lo"

INDICTMENT

Violations:

Count One: Title 18, United States Code, Sections 545 and 2

A true bill,

Foreperson



Filed in open court this 18th day

of November, 2011.

Thomas S. Perry, Deputy Clerk
Clerk

Bail \$