

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION  
JAN 18 PM 1:28  
CLERK, US DISTRICT COURT  
MIDDLE DISTRICT OF FL  
JACKSONVILLE FLORIDA

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(S1)-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)

**SUPERSEDING INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

On or about September 22, 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;
- f. 128 barrels pending seizure in Houston, Texas;
- g. 1,344 barrels of honey seized on November 3, 2011 in New Orleans, Louisiana;
- h. 1,536 barrels of honey seized on December 15, 2011 in New Orleans, Louisiana;
- i. 920 barrels of honey seized on January 3, 2012 in Comstock Park, Michigan;
- j. 576 barrels of honey seized on December 21, 2011 in Norfolk, Virginia;
- k. 786 barrels of honey seized on November 3, 2011 in Mobile, Alabama;
- l. 1,280 barrels of honey seized on December 20, 2011 in Los Angeles, California;
- m. 1,216 barrels of honey pending seizure in Melville, New York;
- n. 384 barrels of honey pending seizure in Eugene, Oregon;
- o. 384 barrels of honey pending seizure in San Francisco, California; and
- p. \$4,000.00 in United States currency seized from the defendant on November 16, 2011.

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 "Dott"  
WEITANG LO,  
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a/k/a "Larry Law"  
a/k/a "David Lo"

**SUPERSEDING INDICTMENT**

Violations:

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

A true bill,

*M. J. Halloran*

Foreperson

Filed in open court this 18th day

of January, 2012.

*Thomas S. Renvetti, Deputy Clerk*  
Clerk

Bail \$