

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

CHAOJIE CHEN,
a/k/a "Chao Jie Chen,"
a/k/a "Cao Jie Chen,"
a/k/a "Jay,"
a/k/a "Jie"
a/k/a "Jimmy,"
a/k/a "Tim,"
a/k/a "Justin,"
a/k/a "Kelvin,"

Defendant.

Case No. 1:24-cr-169

Count 1: Conspiracy to Launder
Monetary Instruments
(18 U.S.C. § 1956(h))

Forfeiture Notice

CRIMINAL INFORMATION

COUNT ONE

(Conspiracy to Launder Monetary Instruments)

THE UNITED STATES ATTORNEY CHARGES THAT:

From at least April 2019 and continuing thereafter up to and including April 18, 2024, within the Eastern District of Virginia and elsewhere, the defendant, CHAOJIE CHEN, did knowingly and intentionally combine, conspire, confederate, and agree with others, both known and unknown, to commit offenses against the United States, in violation of 18 U.S.C. § 1956, to wit: (1) to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the distribution of controlled substances and conspiracy to do the same, in violation of Title 21, United States Code, Sections

841(a)(1) and 846, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and (2) to conduct financial transactions affecting interstate and foreign commerce, which involved property represented to be the proceeds of specified unlawful activity, that is, the distribution of controlled substances and conspiracy to do the same, in violation of Title 21, United States Code, Section 841(a)(1) and 846, with the intent to conceal and disguise the nature, location, source, ownership, and control of the property believed to be the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

(In violation of Title 18, United States Code, Section 1956(h))

FORFEITURE NOTICE

The defendant, CHAOJIE CHEN, is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of the offense alleged in Count One of the Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense or any property traceable to such property.

The defendant, CHAOJIE CHEN, is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of the offense alleged in the Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms or ammunition used in or involved in the violation.

Pursuant to Title 21, United States Code, Section 853(p), the defendant, CHAOJIE CHEN, shall forfeit substitute property, if, by any act or omission of the defendant, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(Pursuant to Title 18, United States Code, Section 982(a)(1); Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853; Title 28, United States Code, Section 2461(c); and Federal Rule of Criminal Procedure 32.2(a).)

Respectfully submitted,

Jessica D. Aber
United States Attorney

Date: August 5, 2024

By: _____ /s/
Edgardo J. Rodriguez
Assistant United States Attorney

Margaret A. Moeser
Chief, Money Laundering and Asset Recovery Section

By: _____ /s/
Mary K. Daly
Trial Attorney