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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MEI XING
aka "Xing Mei,"
"Anna," and
"Boss,"

Defendant.

CR 20-228(B)-FMO

S E C O N D
S U P E R S E D I N G
I N D I C T M E N T

[18 U.S.C. §§ 1591(a)(1), (a)(2),
(b)(1): Sex Trafficking; 18 U.S.C.
§ 1594(d); and 28 U.S.C. § 2461:
Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1)]

Beginning in or around February 2017, through on or about April 2018, in Los Angeles County, within the Central District of California, defendant MEI XING, also known as ("aka") "Xing Mei," "Anna," and "Boss," in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture

1 that recruited, enticed, harbored, transported, provided, obtained,
2 and maintained by any means, Victim 2, knowing and recklessly
3 disregarding that threats of force, fraud, and coercion, as defined
4 in Title 18, United States Code, Section 1591(e)(2), and any
5 combination of such means, would be used to cause Victim 2 to engage
6 in a commercial sex act.

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COUNT TWO

[18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1)]

Beginning in or around July 2016, but no later than on or about May 2017, in Los Angeles County, within the Central District of California, defendant MEI XING, aka "Xing Mei," "Anna," and "Boss," in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture that recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, Victim 5, knowing and recklessly disregarding that threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 5 to engage in a commercial sex act.

COUNT THREE

[18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1)]

Beginning in or around December 2016, through on or about January 2017, in Los Angeles County, within the Central District of California, defendant MEI XING, aka "Xing Mei," "Anna," and "Boss," in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture that recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, Victim 4, knowing and recklessly disregarding that threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 4 to engage in a commercial sex act.

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COUNT FOUR

[18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1)]

Beginning in or around January 2017, through on or about October 23, 2018, in Los Angeles County, within the Central District of California, defendant MEI XING, aka "Xing Mei," "Anna," and "Boss," in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture that recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, Victim 3, knowing and recklessly disregarding that threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 3 to engage in a commercial sex act.

COUNT FIVE

[18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1)]

Beginning in or around January 2017, through on or about October 2018, in Los Angeles County, within the Central District of California, defendant MEI XING, aka "Xing Mei," "Anna," and "Boss," in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture that recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, Victim 6, knowing and recklessly disregarding that threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 6 to engage in a commercial sex act.

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FORFEITURE ALLEGATION

[18 U.S.C. § 1594(d) and 28 U.S.C. § 2461]

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3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 1594(d), and Title 28, United States
7 Code, Section 2461(c), in the event of any defendant's conviction of
8 the offenses set forth in any of Counts One through Five of this
9 Second Superseding Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) Any property, real or personal, that was involved in,
13 used, or intended to be used to commit or to facilitate the
14 commission of such violation, and any property traceable to such
15 property;

16 (b) Any property, real or personal, constituting or
17 derived from, any proceeds that such person obtained, directly or
18 indirectly, as a result of such violation, or any property traceable
19 to such property; and

20 (c) In the event such property is not available for
21 forfeiture, a sum of money equal to the total value of the property
22 described in subparagraphs (a) and (b).

23 3. Pursuant to Title 21, United States Code, Section 853(p),
24 as incorporated by Title 28, United States Code, Section 2461(c), any
25 defendant so convicted shall forfeit substitute property, up to the
26 total value of the property described in the preceding paragraph if,
27 as the result of any act or omission of said defendant, the property
28 described in the preceding paragraph, or any portion thereof (a)

1 cannot be located upon the exercise of due diligence; (b) has been
2 transferred, sold to or deposited with a third party; (c) has been
3 placed beyond the jurisdiction of the court; (d) has been
4 substantially diminished in value; or (e) has been commingled with
5 other property that cannot be divided without difficulty.

6 A TRUE BILL

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8 /s/

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Foreperson

10 E. MARTIN ESTRADA
11 United States Attorney

12 
13 *Scott M. Garringer*
14 *Deputy Chief, Criminal Division For:*

15 MACK E. JENKINS
16 Assistant United States Attorney
17 Chief, Criminal Division

18 JEFFREY M. CHEMERINSKY
19 Assistant United States Attorney
20 Chief, Violent & Organized Crime
21 Section

22 SCOTT M. LARA
23 DAMARIS DIAZ
24 Assistant United States Attorneys
25 Violent & Organized Crime Section
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