

FILED

DEC 09 2025

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

v.

TIANZHU CHEN,
JINGLIU CHEN,
KANGHUA CHEN,
YONG CHEN,
XIAN QUAN GUO,
JIAN XIN HUANG,
JIANFA HUANG,
BEN QIU LIN,
FUKANG WANG,
FUTAO WANG,
JIA ZHOU WANG,
JIE WANG,
XIANGJING WANG,
DANRONG ZHANG,
JIE ZHU,
CHANG YONG ZOU,
CHANGXU ZOU,
CHANGYU ZOU, and
WENRONG ZOU,

Defendants.

Criminal No. 4:25-cr-148

INDICTMENT

T. 18 U.S.C. § 2
T. 18 U.S.C. § 371
T. 18 U.S.C. § 1956(a)(1)(A)(i)
T. 18 U.S.C. § 1957
T. 18 U.S.C. § 1962(d)
T. 18 U.S.C. § 1963
T. 18 U.S.C. § 2314

Western District of Oklahoma
MJ-25-675-STE

THE GRAND JURY CHARGES:

INTRODUCTION

The Enterprise

1. At various times relevant to this Indictment, the defendants,

TIANZHU CHEN,
KANGHUA CHEN,
YONG CHEN,
XIAN QUAN GUO,
JIAN XIN HUANG,
JIANFA HUANG,

BEN QIU LIN,
FUKANG WANG,
FUTAO WANG,
JIE WANG,
XIANGJING WANG,
JIE ZHU,
CHANG YONG ZOU, and
CHANGYU ZOU,

and others known and unknown to the Grand Jury, were members and associates of a criminal organization whose members and associates engaged in the interstate transportation of stolen property, money laundering, and other criminal activities, and which was based in, and operated throughout Iowa, Alabama, Illinois, Ohio, Tennessee, and elsewhere. The organization stole and sold used cooking oil (UCO), which can be converted to other uses such as bio-diesel fuel, and transported and caused to be transported stolen UCO of a value of \$5,000 or more in interstate commerce. The proceeds of the sale of stolen UCO were deposited into bank accounts from which the organization conducted financial and monetary transactions.

2. The organization, including its leaders, members, and associates constituted an “enterprise” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, that engaged in, and the activities of which affected, interstate and foreign commerce (hereinafter “ENTERPRISE”). The ENTERPRISE constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the ENTERPRISE.

Purposes of the Enterprise

3. The purposes of the ENTERPRISE included, but were not limited to:
 - a. enriching members and associates of the ENTERPRISE;
 - b. protecting the ENTERPRISE, its members, and associates by engaging methods to avoid detection;
 - c. promoting and enhancing the ENTERPRISE and its members' and associates' activities; and
 - d. providing support to ENTERPRISE members and associates who were charged with, or incarcerated for, theft-related activities.

Means and Methods of the Enterprise

4. Among the means and methods by which the members and associates of the ENTERPRISE conducted and participated in the conduct of the affairs of the ENTERPRISE were the following:
 - a. forming corporations and establishing bank accounts through which the proceeds of the ENTERPRISE flowed;
 - b. leasing facilities and obtaining tanks and equipment for storage of UCO;
 - c. providing food and housing for members and associates of the ENTERPRISE;
 - d. providing transportation to and from the storage facilities and other locations for members and associates of the ENTERPRISE;

- e. providing and maintaining box trucks¹ and equipment for use in stealing UCO;
- f. changing registered ownership of box trucks as needed to avoid detection;
- g. relocating storage facilities and residences to avoid detection;
- h. arranging for the transport and sale of stolen UCO;
- i. withdrawing large sums of cash proceeds from accounts to enrich the ENTERPRISE, and its members and associates; and
- j. conducting financial and monetary transactions to promote and enrich the ENTERPRISE.

THE GRAND JURY FURTHER CHARGES:

COUNT 1
(Racketeering Conspiracy)

5. Paragraphs 1 through 4 are hereby alleged and incorporated as if set forth fully herein.

6. From at least in or about August 2020, through on or about December 8, 2025, in the Southern District of Iowa and elsewhere, the defendants,

TIANZHU CHEN,
KANGHUA CHEN,
YONG CHEN,
XIAN QUAN GUO,
JIAN XIN HUANG,
JIANFA HUANG,
BEN QIU LIN,

¹ Freightliner and International are brands of commercial box trucks identified below in this Indictment.

FUKANG WANG,
FUTAO WANG,
JIE WANG,
XIANGJING WANG,
JIE ZHU,
CHANG YONG ZOU, and
CHANGYU ZOU,

together with others known and unknown to the Grand Jury, each being persons employed by and associated with the ENTERPRISE, which engaged in, and the activities of which affected interstate commerce, knowingly and intentionally conspired to violate 18 U.S.C. § 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the ENTERPRISE through a pattern of racketeering activity, as that term is defined by 18 U.S.C. § 1961(1) and (5). The pattern of racketeering activity through which defendants and others agreed to conduct the affairs of the enterprise consisted of multiple acts indictable under 18 U.S.C. § 2314 (relating to interstate transportation of stolen property), 18 U.S.C. § 1956 (relating to laundering of monetary instruments), and 18 U.S.C. § 1957 (relating to engaging in monetary transactions in property derived from specified unlawful activity).

7. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the ENTERPRISE.

Overt Acts

8. In furtherance of the racketeering conspiracy, and to achieve the object thereof, the defendants and others known and unknown committed, and caused to be

committed, the following acts, among others, in the Southern District of Iowa and elsewhere.

9. On or about October 7, 2019, TIANZHU CHEN filed articles of incorporation for Cleancycle Inc., in Iowa.

10. On or about August 14, 2020, TIANZHU CHEN and FUKANG WANG using a 2015 Freightliner, VIN²: 3ALACWDTXFDGF9886, registered owner TIANZHU CHEN, stole and attempted to steal UCO from a restaurant in Coralville, Iowa. On August 17, 2020, the 2015 Freightliner, VIN: 3ALACWDTXFDGF9886, was retitled to JIA ZHOU WANG.

11. On or about August 30, 2021, TIANZHU CHEN entered a lease agreement for a warehouse on E. Church Street, Lewisburg, Tennessee.

12. On or about November 5, 2021, FUKANG WANG entered a lease agreement for a unit of a duplex on Old Columbia Road, Lewisburg, Tennessee.

13. On or about December 6, 2021, FUKANG WANG entered into a lease agreement for a unit of a duplex on Old Columbia Road, Lewisburg, Tennessee.

14. On or about April 6, 2022, KANGHUA CHEN purchased a 2016 Freightliner, VIN: 3ALACWDT2GDGX2945.

15. On or about May 1, 2022, JIAN XIN HUANG and another transported stolen UCO near Cedar Rapids, Iowa, using a 2015 Freightliner, VIN: 3ALACWDTXFDGF9886, registered owner TIANZHU CHEN.

² Vehicle Identification Number (hereinafter "VIN").

16. On or about May 11, 2022, TIANZHU CHEN purchased a 2013 Ford F150, VIN: 1FTFW1ET8DFB98816.

17. On or about July 15, 2022, CHANGYU ZOU made a down payment of \$3,700 for the purchase of a 2017 International 4300, VIN 1HTMMMML5HH471739.

18. On or about July 19, 2022, KANGHUA CHEN paid the balance of \$34,241.95 for the purchase of a 2017 International 4300, VIN 1HTMMMML5HH471739.

19. On or about July 20, 2022, TIANZHU CHEN entered into a lease agreement for a warehouse on Lincoln Highway, Nevada, Iowa.

20. On or about July 31, 2022, co-conspirators who resided in a residence rented by FUKANG WANG stole UCO at a restaurant in East Ridge, Tennessee using a 2016 Freightliner, VIN: 3ALACWDT8GDHN5893, registered owner CHANGYU ZOU, with the warehouse address on E. Church Street, Lewisburg, Tennessee.

21. On or about August 11, 2022, TIANZHU CHEN paid rent for a warehouse on Lincoln Highway, Nevada, Iowa.

22. On or about September 6, 2022, co-conspirators, in a 2016 Freightliner, VIN: 3ALACWDT2GDGX2945, owned by KANGHUA CHEN, in the course of stealing UCO in Hendersonville, Tennessee, intimidated and attempted to intimidate a victim company representative with contractual rights to the UCO.

23. On or about November 28, 2022, CHANG YONG ZOU and another stole UCO from a restaurant in Chattanooga, Tennessee using a 2016 Freightliner, VIN:

3ALACWDT8GDHN5893, registered owner CHANGYU ZOU, with the warehouse address on E. Church Street, Lewisburg, Tennessee.

24. On or about November 29, 2022, XIAN QUAN GUO and JIAN XIN HUANG, using a 2015 Freightliner, VIN: 3ALACWDTXFDGF9886, registered owner TIANZHU CHEN, stole UCO from a restaurant in Cedar Rapids, Iowa.

25. On or about December 5, 2022, YONG CHEN and another, using a 2018 International 4000, VIN: 1HTMMMML1JH330575, stole UCO from a restaurant in Baxley, Georgia.

26. On or about December 5, 2022, KANGHUA CHEN attempted to retrieve YONG CHEN's wallet after YONG CHEN's arrest for theft of UCO in Baxley, Georgia.

27. On or about January 2, 2023, FUKANG WANG renewed leases for two units of a duplex on Old Columbia Road, Lewisburg, Tennessee.

28. On or about February 4, 2023, CHANGYU ZOU and another, using a 2016 Freightliner, VIN: 3ALACWDT8GDHN5893, registered owner CHANGYU ZOU, with the warehouse address on E. Church Street, Lewisburg, Tennessee, stole UCO from a restaurant in Hendersonville, Tennessee.

29. On or about March 23, 2023, DANRONG ZHANG filed articles of incorporation for Clearcycle, Inc., in Iowa.

30. On or about May 8, 2023, DANRONG ZHANG and TIANZHU CHEN used and aided and abetted the use of TD debit card *0991, for a purchase in the amount of \$853.82 for equipment including hoses, couplers, and clamps, to be shipped

to “Clean Cycle Inc.,” at the warehouse address on E. Church Street, Lewisburg, Tennessee.

31. On or about June 15, 2023, TIANZHU CHEN paid the fine imposed upon XIAN QUAN GUO in connection with theft of UCO in Cedar Rapids, Iowa, on November 29, 2022.

32. On or about June 20, 2023, JIA ZHOU WANG incorporated King Oil Recycling, Inc., in New York.

33. On or about July 10, 2023, JIE ZHU filed a certificate of incorporation for Jiechen Oil Recycling, Inc., in New York.

34. On or about September 25, 2023, YONG CHEN and JIE WANG, using a 2015 Freightliner, VIN: 3ALACWDTXFDGF9886, registered owner XIAN QUAN GUO, with an address on Maple Avenue, Nevada, Iowa, attempted to steal UCO from a restaurant in Albert Lea, Minnesota.

35. On or about October 6, 2023, TIANZHU CHEN and XIAN QUAN GUO were operating the storage facility in Nevada, Iowa.

36. On or about November 4, 2023, JIAN XIN HUANG and another, using a 2016 Freightliner, VIN: 3ALACWDT1GDHH1963, registered owner YONG CHEN, with an address on Brockton Drive, Cincinnati, Ohio, attempted to steal UCO at a restaurant in Taylorsville, Indiana.

37. On or about December 8, 2023, TIANZHU CHEN and others moved the Iowa warehouse to an address on N.E. 70th Avenue, Ankeny, Iowa.

38. On or about March 19, 2024, JIAN XIN HUANG and JIANFA HUANG, using a 2015 Freightliner, VIN: 3ALACWDTXFDGF9886, registered owner XIAN QUAN GUO, with an address on Maple Avenue, Nevada, Iowa, stole UCO at multiple restaurants in the Des Moines, Iowa, metro area.

39. On or about April 12, 2024, JIE ZHU paid \$1,688.99 for service and repairs to a 2015 Freightliner, VIN: 3ALACWDTXFDGF9886, registered owner XIAN QUAN GUO, with an address on Maple Ave, Nevada, Iowa.

40. On or about May 16, 2024, XIANGJING WANG and JIANFA HUANG, using a 2015 Freightliner, VIN: 3ALACWDTXFDGF9886, registered owner TIANZHU CHEN, with an address on Maple Avenue, Nevada, Iowa, transported stolen UCO from Nebraska to Iowa.

41. On or about May 16, 2024, JIANFA HUANG sent TIANZHU CHEN photos of citations issued to XIANGJING WANG in connection with a traffic stop in Avoca, Iowa, that occurred while transporting UCO from Nebraska to Iowa.

42. On or about May 29, 2024, JIE ZHU paid rent for a residence on N.W. Cedarwood Drive, Ankeny, Iowa, (hereinafter "Ankeny crew residence") and forwarded proof of payment to TIANZHU CHEN. On or about the following dates, JIE ZHU also paid the rent for this residence in Ankeny, Iowa: July 1, 2024; July 29, 2024; August 30, 2024; September 30, 2024; October 31, 2024; November 27, 2024; December 27, 2024; and January 28, 2025.

43. On or about August 3, 2024, JINGLIU CHEN changed title, registration, and license plates on the 2013 International, VIN: 3HAMMAAL2DL236030, to JINGLIU CHEN, with an address on Maple Avenue, Nevada, Iowa.

44. On or about November 24, 2024, XIAN QUAN GUO and another, using a 2017 Freightliner, VIN: 1FVACWCY1HHHW7263, registered owner TIANZHU CHEN, with an address on N.W. Cedarwood Drive, Ankeny, Iowa, transported stolen cooking oil in Cedar County, Iowa.

45. On or about December 9, 2024, JINGLIU CHEN incorporated TDR Harmony Trading Corp. in Alabama.

46. On or about December 16, 2024, JIAN XIN HUANG and XIANGJING WANG, using a 2017 Freightliner, VIN: 1FVACWCY1HHHW7263, registered owner TIANZHU CHEN, with an address on N.W. Cedarwood Drive, Ankeny, Iowa, stole UCO from a restaurant in Cedar Falls, Iowa.

47. On or about January 10, 2025, in Graysville, Alabama, XIAN QUAN GUO, using a 2017 Freightliner, VIN: 3ALACWDT3HDJG5885, registered owner TIANZHU CHEN, with an address on Twain Circle, Ames, Iowa, transported stolen cooking oil, during which he hit a guardrail and rolled the box truck spilling stolen UCO onto the highway.

48. On or about February 12, 2025, YONG CHEN and another, using a 2016 Freightliner, VIN: 3ALACWDT6GDHT7778, registered owner JIE ZHU, with an address on Brockton Drive, Cincinnati, Ohio, stole UCO from a restaurant in Gahanna, Ohio.

49. On or about February 20, 2025, CHANG YONG ZOU and XIAN QUAN GUO operated the Dora, Alabama, warehouse and were in possession of a 2013 International, VIN: 1HTMMAAL0DH481141, registered owner CHANG YONG ZOU, with an address on Maple Avenue, Nevada, Iowa, which was involved in the theft of UCO from a restaurant in Cullman, Alabama, on February 18, 2025.

50. On or about March 6, 2025, CHANGXU ZOU and WENRONG ZOU, using a 2017 International, VIN: 1HTMMMML5HH471739, registered owner CHANGYU ZOU, with an address on Twain Circle, Ames, Iowa, stole UCO from a restaurant in Springfield, Illinois.

51. On or about March 10, 2025, CHANGXU ZOU attempted to retrieve a 2017 International, VIN: 1HTMMMML5HH471739, from impound in Illinois after it was seized by law enforcement during the arrest of CHANGXU ZOU and WENRONG ZOU for UCO theft on March 6, 2025.

52. On or about March 17, 2025, WENRONG ZOU obtained a 2017 International, VIN: 1HTMMMML5HH471739, from impound in Illinois after it was seized by law enforcement during the arrest of CHANGXU ZOU and WENRONG ZOU for UCO theft on March 6, 2025.

53. On or about March 22, 2025, XIAN QUAN GUO and another, using a 2013 International, VIN: 3HAMMAAL2DL236030, register owner TIANZHU CHEN, with an address of N.W. Cedarwood Drive, Ankeny, Iowa, stole UCO from a restaurant in Ames, Iowa.

54. On or about March 26, 2025, CHANG YONG ZOU was operating the warehouse in Dora, Alabama.

55. On or about April 8, 2025, JIAN XIN HUANG and XIAN QUAN GUO used a 2013 Ford F-150, VIN: 1FTFW1ET8DFB98816, registered owner YONG CHEN, with an address on N.W. Cedarwood Drive, Ankeny, Iowa, to travel to a vehicle dealership in Ames, Iowa, to pick up a 2007 Lexus, VIN: JTHBJ46G472076271, which was titled with a register owner JIAN XIN HUANG, with an address on N.W. Cedarwood Drive, Ankeny, Iowa, which operated similarly to the 2013 Ford F-150 to support the activities of the ENTERPRISE.

56. On or about April 30, 2025, XIAN QUAN GUO and FUTAO WANG traveled to Ohio in a 2013 Ford F-150, VIN: 3HAMMAAL2DL236030, to assist in the move of the Ohio warehouse from Harrison to Tipp City, Ohio.

57. On or about May 3, 2025, JIE ZHU used 2013 Ford F-150, VIN: 3HAMMAAL2DL236030, to pull a trailer containing multiple large storage tanks, used to store stolen UCO, out of the Harrison, Ohio, storage facility bound for the Tipp City, Ohio, warehouse when a large tank rolled off the trailer striking the vehicle of an innocent motorist. JIE WANG and FUTAO WANG were with JIE ZHU on this occasion assisting with the warehouse move.

58. On or about May 8, 2025, DANRONG ZHANG paid for an American Airlines plane ticket for TIANZHU CHEN, from LaGuardia Airport, in New York, to Des Moines International Airport, in Iowa, and aided and abetted the same. TIANZHU CHEN went to the Ankeny crew residence upon arrival.

59. On or about May 9, 2025, TIANZHU CHEN went to the Story County administration building in Nevada, Iowa, and changed the title, registration, and plates of the 2017 International, VIN: 1HTMMMML5HH471739, to registered owner TIANZHU CHEN, with an address on Twain Circle, Ames, Iowa.

60. On or about May 20, 2025, TIANZHU CHEN drove a 2013 Ford F-150, VIN: 3HAMMAAL2DL236030, to the Story County administration building in Nevada, Iowa, and changed the title, registration, and plates of the 2013 International, VIN: 1HTMMAAL0DH481141, to registered owner TIANZHU CHEN, with an address on Twain Circle, Ames, Iowa.

61. On or about May 22, 2025, JIANFA HUANG and BEN QIU LIN, using a 2013 International, VIN: 1HTMMAAL0DH481141, registered owner TIANZHU CHEN, with an address on Twain Circle, Ames, Iowa, stole UCO in the Des Moines, Iowa, metro area and nearby communities.

62. On or about May 28, 2025, JIA ZHOU WANG paid \$5,190.35 for repairs to a 2017 International, VIN: 1HTMMMML5HH471739, registered owner TIANZHU CHEN, with an address on Twain Circle, Ames, Iowa.

63. On or about August 1, 2025, JIAN XIN HUANG and JIANFA HUANG, using a 2017 Freightliner, VIN: 1FVACWCY1HHHW7263, registered owner TIANZHU CHEN, with an address on N.W. Cedarwood Drive, Ankeny, Iowa, stole UCO at multiple restaurants in Des Moines, Iowa.

64. On or about September 12, 2025, XIAN QUAN GUO, FUTAO WANG, and TIANZHU CHEN traveled to the warehouse in Dora, Alabama, and in the week

that followed, they and JIAN XIN HUANG, used the 2017 freightliner, VIN: 1FVACWCY1HHHW7263, registered owner TIANZHU CHEN, with an address on N.W. Cedarwood Drive, Ankeny, Iowa, to move UCO equipment to a location in Trenton, Kentucky.

65. On or about September 19, 2025, TIANZHU CHEN and JIAN XIN HUANG traveled to the Story County administration building in Nevada, Iowa, and changed the title, registration, and plates of the 2017 freightliner, VIN: 1FVACWCY1HHHW7263, from TIANZHU CHEN to JIAN XIN HUANG, with an address on Twain Circle, Ames, Iowa.

66. On or about September 20, 2025, YONG CHEN and BEN QIU LIN, using 2015 Freightliner, VIN: 3ALACWDT1GDHH1963, registered owner JIE ZHU, with an address on Brockton Drive, Cincinnati, Ohio, stole UCO from a restaurant in Florence, Kentucky.

67. On or about September 25, 2025, TIANZHU CHEN rented a Volkswagen Jetta from a car rental business in Ankeny, Iowa, for use in retrieving the 2017 freightliner, VIN: 1FVACWCY1HHHW7263, from Trenton, Kentucky.

68. On or about September 26, 2025, JIAN XIN HUANG and XIAN QUAN GUO traveled from Ankeny, Iowa, to Trenton, Kentucky, in the rented Volkswagen Jetta, returned the rented Volkswagen Jetta to a rental business in Clarksville, Tennessee, and drove the 2017 freightliner, VIN: 1FVACWCY1HHHW7263, to a warehouse on N.E. 70th Avenue, Ankeny, Iowa.

69. On or about October 9, 2025, XIAN QUAN GUO and another person using the 2017 International, VIN: 1HTMMMML5HH471739, registered owner TIANZHU CHEN, with an address on Twain Circle, Ames, Iowa, conducted overnight UCO thefts at approximately twenty restaurants in Marshalltown, Ames, and Huxley, Iowa.

70. On or about October 27, 2025, XIANGJING WANG, FUTAO WANG, JIANFA HUANG, and XIAN QUAN GUO removed UCO storage tanks from three box trucks, the 2017 Freightliner, VIN: 1FVACWCY1HHHW7263; the 2017 International, VIN: 1HTMMMML5HH471739; and the 2013 International, VIN: 1HTMMAAL0DH481141, and placed the tanks in the warehouse on N.E. 70th Avenue, Ankeny, Iowa.

71. On or about October 29, 2025, XIAN QUAN GUO removed the UCO storage container from the 2013 International, VIN: 3HAMMAAL2DL236030, and placed the container in the warehouse on N.E. 70th Avenue, Ankeny, Iowa.

72. On or about November 7, 2025, JINGLIU CHEN and XIANGJING WANG traveled to the Story County administration building in Nevada, Iowa, where JINGLIU CHEN changed the title, registration, and plates of the 2017 International, VIN: 1HTMMMML5HH471739, and the 2013 International, VIN: 1HTMMAAL0DH481141, to JINGLIU CHEN, with an address on Twain Circle, Ames, Iowa.

73. On or about November 10, 2025, JINGLIU CHEN traveled to Boone County, Iowa, and changed the title, registration, and plates of a 2007 Lexus E350,

VIN: JTHBJ46G472076271, to JINGLIU CHEN, with an address on Twain Circle, Ames, Iowa.

74. On or about November 14 thru 15, 2025, XIAN QUAN GUO, XIANGJING WANG, and FUTAO WANG using the 2017 International, VIN: 1HTMMMML5HH471739, moved the contents of the Ankeny crew to a residence on N.E. 11th Court, Des Moines, Iowa.

75. The allegations in Counts 3 through 9 are incorporated and alleged herein as further overt acts.

This is a violation of Title 18, United States Code, Section 1962(d).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

(Conspiracy - Interstate Transportation of Stolen Property)

76. Beginning by at least as early as on or about August 2020, and continuing to on or about December 8, 2025, in the Southern District of Iowa and elsewhere, defendants,

TIANZHU CHEN,
JINGLIU CHEN,
KANGHUA CHEN,
YONG CHEN,
XIAN QUAN GUO,
JIAN XIN HUANG,
JIANFA HUANG
BEN QIU LIN,
FUKANG WANG,
FUTAO WANG,
JIA ZHOU WANG,
JIE WANG
XIANGJING WANG,
DANRONG ZHANG,

JIE ZHU,
CHANG YONG ZOU,
CHANGXU ZOU,
CHANGYU ZOU, and
WENRONG ZOU

together with other persons known and unknown to the Grand Jury, knowingly and willfully conspired and agreed to commit offenses against the United States, those being interstate transportation of stolen property, in violation of Title 18, United States Code, Section 2314.

Manner and Means of the Conspiracy

77. The manner and means by which the objects of the conspiracy were accomplished included, but were not limited to, the following.

78. It was a part of the conspiracy that one or more of the defendants and others known and unknown to the Grand Jury would identify locations from which to steal UCO.

79. It was part of the conspiracy that one or more of the defendants and others known and unknown to the Grand Jury would travel to the warehouse, gain access to a box truck, and drive to the theft location.

80. It was a part of the conspiracy that one or more of the defendants and others known and unknown to the Grand Jury would steal UCO, secure it in a tank in the back of a box truck, and offload the stolen UCO in storage tanks at a warehouse.

81. It was a part of the conspiracy that one or more of the defendants and others known and unknown to the Grand Jury would arrange for the sale and

transport of the stolen UCO to a third party for recycling during the process of which stolen UCO with a value of \$5,000 or more was transported in interstate commerce.

Overt Acts

82. On or about the alleged dates, in furtherance of the conspiracy, and to effect the objects thereof, the defendants, and their co-conspirators and agents, in the Southern District of Iowa, and elsewhere, committed and caused to be committed the overt acts as set forth in paragraphs, 9 through 74 and Counts 3 through 9 of this Indictment, which are incorporated and alleged herein as overt acts, among others.

This is a violation of Title 18, United States Code, Section 371.

THE GRAND JURY FURTHER CHARGES:

COUNT 3
(Interstate Transportation of Stolen Property)

From on or about December 20, 2024, to on or about February 4, 2025, in the Southern District of Iowa and elsewhere, the defendants, TIANZHU CHEN, JIA ZHOU WANG, JIE ZHU, and JIAN XIN HUANG, did transport and transfer and cause to be transported and transferred in interstate commerce, goods, that is, UCO, with a value of \$5,000 or more, knowing the same to have been stolen, and aided and abetted same.

This is a violation of Title 18, United States Code, Sections 2314 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 4

(Interstate Transportation of Stolen Property)

From on or about February 6, 2025, to on or about February 26, 2025, in the Southern District of Iowa and elsewhere, the defendants, FUTAO WANG, XIANGJING WANG, TIANZHU CHEN, JIA ZHOU WANG, YONG CHEN, JIE ZHU, and JIAN XIN HUANG, did transport and transfer and cause to be transported and transferred in interstate commerce, goods, that is, UCO, with a value of \$5,000 or more, knowing the same to have been stolen, and aided and abetted same.

This is a violation of Title 18, United States Code, Sections 2314 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 5

(Interstate Transportation of Stolen Property)

From in or about March 13, 2025, to on or about April 10, 2025, in the Southern District of Iowa and elsewhere, the defendants, JIANFA HUANG, XIANGJING WANG, YONG CHEN, TIANZHU CHEN, JIA ZHOU WANG, JIE ZHU, and JIAN XIN HUANG, did transport and transfer and cause to be transported and transferred in interstate commerce, goods, that is, UCO, with a value of \$5,000 or more, knowing the same to have been stolen, and aided and abetted same.

This is a violation of Title 18, United States Code, Sections 2314 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 6
(Money Laundering)

On or about April 10, 2023, in the Southern District of Iowa and elsewhere, defendant TIANZHU CHEN, did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce in criminally derived property, having been derived from one or more specified unlawful activities, that is interstate transportation of stolen property (18 U.S.C. § 2314), that is, the issuance of a check in the amount of \$1,800 from account *3948 at US Bank, into which account said criminally derived proceeds had been deposited, which check was negotiated, with an intent to promote the carrying on of the crime of interstate transportation of stolen property.

This is a violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

THE GRAND JURY FURTHER CHARGES:

COUNT 7
(Money Laundering)

On or about May 3, 2023, in the Southern District of Iowa and elsewhere, defendant DANRONG ZHANG did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce in criminally derived property, having been derived from one or more specified unlawful activities, that is interstate transportation of stolen property (18 U.S.C. § 2314), that is, the issuance of a check in the amount of \$1,800 from account *4864 at US Bank, into which account said criminally derived proceeds had been deposited, which check was negotiated, with an

intent to promote the carrying on of the crime of interstate transportation of stolen property, and aided and abetted same.

This is a violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 8
(Money Laundering)

On or about February 9, 2024, in the Southern District of Iowa and elsewhere, defendant JIA ZHOU WANG did knowingly engage and attempt to engage in a monetary transaction by and through a financial institution, and affecting interstate commerce, in criminally derived property of a value greater than \$10,000 having been derived from one or more specified unlawful activities, that is interstate transportation of stolen property (18 U.S.C. § 2314), in that the defendant JIA ZHOU WANG issued a check in the amount of \$20,867 from Bank of America account *6526 into which account said criminally derived proceeds had been deposited, which check was negotiated.

This is a violation of Title 18, United States Code, Section 1957.

THE GRAND JURY FURTHER CHARGES:

COUNT 9
(Money Laundering)

On or about March 20, 2025, in the Southern District of Iowa and elsewhere, defendants JIA ZHOU WANG and TIANZHU CHEN, did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce in criminally

derived property, having been derived from one or more specified unlawful activities, that is interstate transportation of stolen property (18 U.S.C. § 2314), that is, a debit card payment in the amount of \$2,455.81 from account *6526 at Bank of America, into which account said criminally derived proceeds had been deposited, which check was negotiated, with an intent to promote the carrying on of the crime of interstate transportation of stolen property, and aided and abetted same.

This is a violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

THE GRAND JURY FINDS:

NOTICE OF FORFEITURE

1. The allegations contained in Count 1 of this Indictment, charging RICO conspiracy, are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1963.

2. Upon conviction of the offense alleged in Count 1 of this Indictment, the defendants,

TIANZHU CHEN,
KANGHUA CHEN,
YONG CHEN,
XIAN QUAN GUO,
JIAN XIN HUANG,
JIANFA HUANG,
BEN QIU LIN,
FUKANG WANG,
JIE WANG,
XIANGJING WANG,
JIE ZHU,
CHANG YONG ZOU, and
CHANGYU ZOU,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963:

- a. any interest acquired or maintained in violation of Section 1962;
- b. any interest in, security of, claim against, and property and contractual right of any kind affording a source of influence over, the enterprise which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Section 1962; and
- c. any property constituting and derived from, any proceeds which the defendants obtained, directly or indirectly, from racketeering activity in violation of Section 1962.

3. The property to be forfeited includes, but is not limited to:

- a. 2017 Freightliner, VIN: 1FVACWCY1HHHW7263;
- b. 2013 International, VIN: 3HAMMAAL2DL236030;
- c. 2013 Ford F-150, VIN: 1FTFW1ET8DFB98816;
- d. 2017 International, VIN: 1HTMMMML5HH471739;
- e. 2013 International, VIN: 1HTMMAAL0DH481141;
- f. 2016 Freightliner, VIN: 3ALACWDT1GDHH1963;
- g. 2016 Freightliner, VIN: 3ALACWDT6GDHT7778;
- h. 2011 Toyota Rav4, VIN: 2T3BF4DV0BW176209;
- i. 2007 Lexus E350, VIN: JTHBJ46G472076271;
- j. Bank of America Account *3389, titled Jiechen Oil Recycling, Inc., owned by JIE ZHU;

- k. Property inside of box trucks described in 3(a) – 3(g) used to collect and store UCO including storage tanks, gas powered pumps, hoses and attachments;
- l. Property inside the properties described below, used to collect and store UCO including storage tanks, gas powered pumps, hoses, and attachments,
 - i. 1471 NE 70th Avenue, Unit 101 and 102, Ankeny, Iowa;
 - ii. 4240 Lisa Drive, Unit C, Tipp City, Ohio; and
 - iii. 455 Penchem Road, Trenton, Kentucky.

4. To the extent that property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 1963, as a result of any act or omission by 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 subdivided without difficulty;

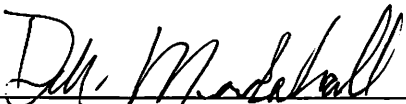
it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendant(s) up to the value of the property described above as being subject to forfeiture.

All pursuant to Title 18, United States Code, Section 1963, and Fed. R. Crim.
P. 32.2.

A TRUE BILL.

~~FOREPERSON~~

David C. Waterman
United States Attorney

By: 
Debra Mendenhall
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

Southern District of Iowa

UNITED STATES OF AMERICA
v.

CHANGYU ZOU

Defendant

Case No. 4:25-cr- 148

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) CHANGYU ZOU,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Ct 1: Racketeering Conspiracy, in violation of T. 18 U.S.C. § 1962(d);

Ct 2: Conspiracy – Interstate Transportation of Stolen Property, in violation of T. 18 U.S.C. § 371



WARRANT ISSUED

CHANDLOR G. COLLINS, Clerk

By: Chandall Platt
DEPUTY CLERKDate: 12/09/2025City and state: Des Moines, IowaWilliam P. Kelly, United states Magistrate Judge*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*