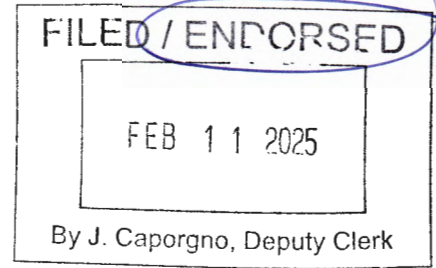


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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SACRAMENTO

13 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

16
17 **WEI HUANG,**
(DOB: 09/03/1974; Xref: 5383252)

18 **LIN ZHANG,**
19 **(DOB: 10/15/1996; Xref: 5560991)**

20 **GUO YANG,**
(DOB: 08/20/1989; Xref: 4521477)

21 **XIAOMEI XIN,**
22 **(DOB 02/03/1987; Xref: 5382876)**

23 Defendants.
24

Case No. 25F002580

FELONY COMPLAINT

Date:

Time:

Dept:

Judge:

25 The Attorney General of the State of California by this complaint hereby accuses
26 DEFENDANTS WEI HUANG, LIN ZHANG, GUO YANG, and XIAOMEI XIN of the
27 following offenses:
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**COUNT ONE
(CONSPIRACY)**

On or about and between, April 19, 2022 and February 13, 2025, in the County of Sacramento, DEFENDANTS WEI HUANG, LIN ZHANG, GUO YANG, and XIAOMEI XIN did unlawfully commit the crime of CONSPIRACY, in violation of section 182(a)(1) of the PENAL CODE, a felony, in that said Defendants did unlawfully conspire together with each other to commit the crime of Pandering, in violation of Section 266i of the PENAL CODE, a felony; and/or Pimping, in violation of Section 266h of the PENAL CODE, a felony; and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy the said Defendants committed the following overt acts throughout the alleged time period:

Overt Act 1

Defendants WEI HUANG, LIN ZHANG, GUO YANG, and XIAOMEI XIN in the furtherance of the conspiracy and to effect its object, on or about and between April 19, 2022 and February 13, 2025, and December 21, 2023 and February 13, 2025, did manage and operate illegal brothel operations at 6811 Bowling Drive, Sacramento, California, and/or 7415 Patero Circle, Sacramento, California.

Overt Act 2

Defendants WEI HUANG, GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to effect its object, on or about and between May 6, 2022 and April 23, 2024, facilitated the maintenance of a website, <https://cuttie2735.wixsite.com/newcar>, where prostitution advertisements were posted.

Overt Act 3

Defendants WEI HUANG, GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to effect its object, on or about and between April 23, 2024 and February 13, 2025, facilitated the maintenance of a website, <https://happy916.com>, where prostitution advertisements were posted.

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Overt Act 4

Defendant WEI HUANG in the furtherance of the conspiracy and to effect its object, on or about and between April 28, 2022 and April 29, 2022, facilitated the entrance of male individuals believed to be sex purchasers at 6811 Bowling Drive, Sacramento, California. Additionally, WEI HUANG picked up a female, believed to be a sex worker, from a hotel and transported her to 6811 Bowling Drive. WEI HUANG facilitated a male individual, believed to be a sex purchaser, enter 6811 Bowling Drive.

Overt Act 5

On or about May 5, 2022 and May 12, 2022, trash collections at 6811 Bowling Drive, Sacramento, California showed the following items in the trash: over 200 used condoms and condom wrappers.

Overt Act 6

Defendants WEI HUANG and XIAOMEI XIN in the furtherance of the conspiracy and to effect its object, on or about May 17, 2022, a male individual, believed to be a sex purchaser, went inside 6811 Bowling Drive, Sacramento, California. During this incident, XIAOMEI XIN's vehicle, a 2019 white Porsche SUV (license plate 8XMF094) was parked in the driveway.

Overt Act 7

Defendants WEI HUANG, GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to effect its object, on or about July 6, 2022, facilitated a commercial sex act at 6811 Bowling Drive, Sacramento, California.

Overt Act 8

Defendant WEI HUANG in the furtherance of the conspiracy and to effect its object, on or about and between July 26, 2022 to July 28, 2022, facilitated entrance and exit of individuals, believed to be sex purchasers, into 6811 Bowling Drive, Sacramento, California.

Overt Act 9

Defendant WEI HUANG in the furtherance of the conspiracy and to effect its object, on or about September 1, 2022, WEI HUANG met with an Asian female who arrived by taxi at 6811

1 Bowling Drive, Sacramento, California, and escorted the female into the residence.

2 Overt Act 10

3 Defendant XIAOMEI XIN in the furtherance of the conspiracy and to effect its object, on
4 or about September 4, 2022, around midnight, delivered two boxes to 6811 Bowling Drive,
5 Sacramento, California.

6 Overt Act 11

7 Defendants GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to
8 effect its object, on or about and between April 19, 2022 and February 13, 2025, and December
9 21, 2023 and February 13, 2025, using the telephone 916-829-0657, communicated with
10 individuals believed to be sex purchasers via text message regarding appointments and entry into
11 6811 Bowling Drive and 7415 Patero Circle.

12 Overt Act 12

13 Defendant WEI HUANG in the furtherance of the conspiracy and to effect its object, on or
14 about and between April 19, 2022 and February 13, 2025, facilitated the entrance of individuals
15 believed to be sex purchasers at 6811 Bowling Drive, Sacramento, California.

16 Overt Act 13

17 Defendants GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to
18 effect its object, on or about and between February 21-22, 2024 using the telephone number 916-
19 829-0657, communicated with a sex purchaser via text message regarding sexual services at 6811
20 Bowling Drive or 7415 Patero Drive, Sacramento and arranged an appointment with a sex
21 purchaser for a commercial sex act.

22 Overt Act 14

23 Defendants GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to
24 effect its object, on or about February 22, 2024 using the telephone number 916-829-0657, sent a
25 text detailing the pricing list for commercial sex services and relayed payment information as
26 payable to XIN'S telephone number 669-226-7473 via Zelle.

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1 Overt Act 15

2 Defendant WEI HUANG in the furtherance of the conspiracy and to effect its object, on or
3 about February 22, 2024, met with a sex purchaser at the door of 6811 Bowling Drive,
4 Sacramento, California and required the sex purchaser to provide a known phone number before
5 he allowed him to enter. Once the sex purchaser provided the known phone number, WEI
6 HUANG led the sex purchaser to a bedroom where sex worker, Jane Doe 1, was located.

7 Overt Act 16

8 Defendants GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to
9 effect its object, on or about February 22, 2024 using the telephone number 916-829-0657,
10 communicated with the sex worker, Jane Doe 1, while sex purchaser was in the room to negotiate
11 a price for commercial sex services.

12 Overt Act 17

13 On or about February 22, 2024, in the furtherance of the conspiracy and to effect its object,
14 the sex purchaser paid \$200 for commercial sexual services to XIN'S Zelle account.

15 Overt Act 18

16 Defendants GUO YANG, and XIAOMEI XIN in the furtherance of the conspiracy and to
17 effect its object, on March 27, 2024, were present when individuals, believed to be sex
18 purchasers, entered and exited 7415 Patero Circle, Sacramento, California.

19 Overt Act 19

20 On April 25, 2024, Defendants GUO YANG, and XIAOMEI XIN in the furtherance of the
21 conspiracy and to effect its object, were at 7415 Patero Circle when a male individual ran from
22 the house to his car parked on the street.

23 Overt Act 20

24 On May 2, 2024, a trash collection at 7415 Patero Circle, Sacramento, California showed
25 the following items in the trash: used condoms, condom wrappers, empty Listerine bottles, and a
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1 deposit receipt from April 24, 2024 showing a \$30,000 into the joint account for GUO YANG
2 and XIAOMEI XIN at JP Morgan Chase bank.

3 Overt Act 21

4 Defendants GUO YANG, LIN ZHANG and XIAOMEI XIN in the furtherance of the
5 conspiracy and to effect its object, on or about May 8, 2024, were at 7415 Patero Circle,
6 Sacramento, California when multiple male individuals entered and exited the residence after
7 about twenty minutes each in a two hour period. Defendant GUO YANG arrived at the residence
8 with an unknown female.

9 Overt Act 22

10 Defendant LIN ZHANG in the furtherance of the conspiracy and to effect its object, on or
11 about and between May 8, 2024 and February 13, 2025, facilitated the entrance of individuals
12 believed to be sex purchasers at 7415 Patero Circle, Sacramento, California.

13 Overt Act 23

14 On June 5, 2024, the website <https://happy916.com> advertised 4 women, believed to be sex
15 workers, at 6811 Bowling Drive, Sacramento, California. Defendant WEI HUANG in the
16 furtherance of the conspiracy and to effect its object, on that same date, maintained the location at
17 6811 Bowling Drive while various male individuals entered and exited the residence for fifteen to
18 twenty minute increments within a 6 hour time period.

19 Overt Act 24

20 Defendants GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to
21 effect its object, on or about August 6, 2024 using the telephone number 916-829-0657,
22 communicated with a sex purchaser via text message regarding sexual services posted on the
23 brothel website <https://happy916.com>.

24 Overt Act 25

25 Defendants GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to
26 effect its object, on or about August 7, 2024 using the telephone number 916-829-0657, arranged
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1 an appointment with a sex purchaser via text message for a commercial sex act at 7415 Patero
2 Circle, Sacramento, California.

3 Overt Act 26

4 Defendant LIN ZHANG in the furtherance of the conspiracy and to effect its object, on or
5 about August 7, 2024, met with a sex purchaser at the door of 7415 Patero Circle, Sacramento,
6 California and sex purchaser showed Defendant LIN ZHANG the text string regarding his
7 appointment and directed the sex purchaser to Room 5 in the brothel where sex worker, Jane Doe
8 2, was located.

9 Overt Act 27

10 On or about August 7, 2024, in the furtherance of the conspiracy and to effect its object, the
11 sex purchaser paid \$200 for sexual services with Jane Doe 2 to a Venmo account Jane Doe 2
12 showed to the sex purchaser.

13 Overt Act 28

14 Defendants GUO YANG, LIN ZHANG, and XIAOMEI XIN in the furtherance of the
15 conspiracy and to effect its object, on or about October 17, 2024, were present at 7415 Patero
16 Circle, Sacramento, California when a male individual entered and exited the residence after
17 about thirty minutes.

18 Overt Act 29

19 Defendants GUO YANG and XIAOMEI XIN in the furtherance of the conspiracy and to
20 effect its object, on October 24, 2024 purchased items from Costco for use at 6811 Bowling Drive
21 and 7415 Patero Circle including, baby oil, Kleenex, and bottled water.

22 Overt Act 30

23 Defendants WEI HUANG, LIN ZHANG, GUO YANG and XIAOMEI XIN in the
24 furtherance of the conspiracy and to effect its object, on October 24, 2024 unloaded the Costco
25 goods for use at 6811 Bowling Drive and 7415 Patero Circle.

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1 Overt Act 31

2 Defendants XIAOMEI XIN in the furtherance of the conspiracy and to effect its object, on
3 October 24, 2024, was observed having control and possession of a cellphone with the number
4 916-829-0657, and answered a telephone call to that number.

5 Overt Act 32

6 Defendants WEI HUANG, GUO YANG and XIAOMEI XIN in the furtherance of the
7 conspiracy and to effect its object, on or about October 29, 2024, facilitated a commercial sex act
8 for \$160 at 6811 Bowling Drive, Sacramento, California.

9 Overt Act 33

10 On December 19, 2024, a trash collection at 7415 Patero Circle, Sacramento, California
11 showed the following items in the trash: used condoms, soiled Kleenex, mouthwash cups, empty
12 Listerine bottles, and an empty 1008 count box of condoms.

14 **COUNT TWO**
15 **(PANDERING)**

16 On or about February 22, 2024, in the County of Sacramento, defendants WEI HUANG,
17 GUO YANG, and XIAOMEI XIN committed the crime of PANDERING, in violation of PENAL
18 CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a place for Jane Doe 1,
19 another person, in a house of prostitution located at 6811 Bowling Drive, Sacramento, California.

20 **COUNT THREE**
21 **(PIMPING)**

22 On or about February 22, 2024, in the County of Sacramento, defendants WEI HUANG,
23 GUO YANG, and XIAOMEI XIN committed the crime of PIMPING, in violation of Penal Code
24 section 266h(a), a Felony, in that they did unlawfully, and knowing, Jane Doe 1, to be a
25 prostitute, live or derive support or maintenance in whole or in part from the earnings or proceeds
26 of said person's prostitution, or from money loaned or advanced to or charged against said
27 prostitute by a keeper, manager, or inmate of a house or other place where prostitution was
28 practiced or allowed, or did solicit or receive compensation for soliciting said prostitute.

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**COUNT FOUR
(PANDERING)**

On or about August 7, 2024, in the County of Sacramento, defendants LIN ZHANG, GUO YANG, and XIAOMEI XIN committed the crime of PANDERING, in violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a place for Jane Doe 2, another person, in a house of prostitution located at 7415 Patero Circle, Sacramento, California.

**COUNT FIVE
(PANDERING)**

On or about October 24, 2024, in the County of Sacramento, defendants WEI HUANG, GUO YANG, and XIAOMEI XIN committed the crime of PANDERING, in violation of PENAL CODE SECTION 266i(a)(4), a Felony, in that they did unlawfully induce, encourage, or persuade an inmate in a house of prostitution, located at 6811 Bowling Drive, Sacramento, California, to remain there.

**COUNT SIX
(PANDERING)**

On or about October 24, 2024, in the County of Sacramento, defendants LIN ZHANG, GUO YANG, and XIAOMEI XIN committed the crime of PANDERING, in violation of PENAL CODE SECTION 266i(a)(4), a Felony, in that they did unlawfully induce, encourage, or persuade an inmate in a house of prostitution, located at 7415 Patero Circle, Sacramento, California, to remain there.

**COUNT SEVEN
(MONEY LAUNDERING)**

On or about or between May 15, 2022 and June 13, 2022, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$25,000 or more within a thirty day period, to wit: \$39,500, ParkWest Casino Lotus Patron ID Number #T31_57420, with the knowledge the monetary instrument represented the proceeds of criminal activity.

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**COUNT EIGHT
(MONEY LAUNDERING)**

On or about or between June 21, 2022 and July 18, 2022, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$25,000 or more within a thirty day period, to wit: \$39,310, ParkWest Casino Lotus Patron ID Number #T31_57420, with the knowledge the monetary instrument represented the proceeds of criminal activity.

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**COUNT NINE
(MONEY LAUNDERING)**

On or about or between August 22, 2022 and August 30, 2022, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$25,000 or more within a thirty day period, to wit: \$38,600, Sky River Casino Patron ID Number #20097794, with the knowledge the monetary instrument represented the proceeds of criminal activity.

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**COUNT TEN
(MONEY LAUNDERING)**

On or about or between August 27, 2022 and September 21, 2022, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$25,000 or more within a thirty day period, to wit: \$32,740, ParkWest Casino Lotus Patron ID Number #T31_57420, with the knowledge the monetary instrument represented the proceeds of criminal activity.

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**COUNT ELEVEN
(MONEY LAUNDERING)**

On or about or between June 20, 2023 and June 26, 2023, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to

1 conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$6,640,
2 Bank of America Account Number Ending #1890 and JP Morgan Chase Bank Account Number
3 Ending #0331, with the knowledge the monetary instrument represented the proceeds of criminal
4 activity.

5
6 **COUNT TWELVE**
(MONEY LAUNDERING)

7 On or about July 7, 2023, in the county of Sacramento, defendant GUO YANG committed
8 the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony,
9 in that he did willfully and unlawfully conduct or attempt to conduct financial transactions
10 totaling \$5,000 or more within a seven day period, to wit: \$6,000, JP Morgan Chase Bank
11 Account Number Ending #0331, with the knowledge the monetary instrument represented the
12 proceeds of criminal activity.

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14 **COUNT THIRTEEN**
(MONEY LAUNDERING)

15 On or about or between December 11, 2023 and December 14, 2023, in the county of
16 Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in
17 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
18 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
19 period, to wit: \$5,300, Bank of America Account Number Ending #1890 and JP Morgan Chase
20 Bank Account Number Ending #0331, with the knowledge the monetary instrument represented
21 the proceeds of criminal activity.

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23 **COUNT FOURTEEN**
(MONEY LAUNDERING)

24 On or about or between January 2, 2024 and January 8, 2024, in the county of Sacramento,
25 defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal
26 Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to
27 conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$8,500,
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1 Bank of America Account Number Ending #1890, with the knowledge the monetary instrument
2 represented the proceeds of criminal activity.

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4 **COUNT FIFTEEN**
5 **(MONEY LAUNDERING)**

6 On or about or between February 1, 2024 and February 5, 2024, in the county of
7 Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in
8 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
9 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
10 period, to wit: \$5,202, Bank of America Account Number Ending #1890, with the knowledge the
11 monetary instrument represented the proceeds of criminal activity.

12 **COUNT SIXTEEN**
13 **(MONEY LAUNDERING)**

14 On or about or between May 28, 2024 and June 26, 2024, in the county of Sacramento,
15 defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal
16 Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to
17 conduct financial transactions totaling \$25,000 or more within a thirty day period, to wit:
18 \$29,180, Bank of America Account Number Ending #1890, with the knowledge the monetary
19 instrument represented the proceeds of criminal activity.

20 **COUNT SEVENTEEN**
21 **(MONEY LAUNDERING)**

22 On or about or between July 10, 2024 and July 16, 2024, in the county of Sacramento,
23 defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal
24 Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to
25 conduct financial transactions totaling \$5,000 or more within a seven day period, to wit:
26 \$8,838.85, Bank of America Account Number Ending #1890 and East West Bank Account
27 Number Ending #8210, with the knowledge the monetary instrument represented the proceeds of
28 criminal activity.

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**COUNT EIGHTEEN
(MONEY LAUNDERING)**

On or about or between August 16, 2024 and August 20, 2024, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$5,600, Bank of America Account Number Ending #1890, with the knowledge the monetary instrument represented the proceeds of criminal activity.

**COUNT NINETEEN
(MONEY LAUNDERING)**

On or about or between September 3, 2024 and September 9, 2024, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$6,490, Bank of America Account Number Ending #1890, with the knowledge the monetary instrument represented the proceeds of criminal activity.

**COUNT TWENTY
(MONEY LAUNDERING)**

On or about or between September 9, 2024 and September 12, 2024, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$5,478.88, Bank of America Account Number Ending #1890, with the knowledge the monetary instrument represented the proceeds of criminal activity.

**COUNT TWENTY-ONE
(MONEY LAUNDERING)**

On or about or between September 16, 2024 and October 15, 2024, in the county of Sacramento, defendant GUO YANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully

1 conduct or attempt to conduct financial transactions totaling \$25,000 or more within a thirty day
2 period, to wit: \$32,526, Bank of America Account Number Ending #1890, with the knowledge
3 the monetary instrument represented the proceeds of criminal activity.

4 **COUNT TWENTY-TWO**
5 **(MONEY LAUNDERING)**

6 On or about October 10, 2024, in the county of Sacramento, defendant GUO YANG
7 committed the crime of MONEY LAUNDERING, in violation of Penal Code section
8 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct
9 financial transactions totaling \$25,000 or more within a thirty day period, to wit: \$260,000, East
10 West Bank Account Number Ending #8210, with the knowledge the monetary instrument
11 represented the proceeds of criminal activity.

12 **COUNT TWENTY-THREE**
13 **(MONEY LAUNDERING)**

14 On or about October 10, 2024, in the county of Sacramento, defendant GUO YANG
15 committed the crime of MONEY LAUNDERING, in violation of Penal Code section
16 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct
17 financial transactions totaling \$25,000 or more within a thirty day period, to wit: \$90,000, Bank
18 of America Account Number Ending #1890, with the knowledge the monetary instrument
19 represented the proceeds of criminal activity.

20 **COUNT TWENTY-FOUR**
21 **(MONEY LAUNDERING)**

22 On or about or between June 26, 2023 and June 29, 2023, in the county of Sacramento,
23 defendant XIAOMEI XIN committed the crime of MONEY LAUNDERING, in violation of
24 Penal Code section 186.10(a)(2), a Felony, in that she did willfully and unlawfully conduct or
25 attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to
26 wit: \$6,700, Bank of America Account Number Ending #5183 and JP Morgan Chase Bank
27 Account Number Ending #0331, with the knowledge the monetary instrument represented the
28 proceeds of criminal activity.

1 **COUNT TWENTY-FIVE**
2 **(MONEY LAUNDERING)**

3 On or about or between July 3, 2023 and July 7, 2023, in the county of Sacramento,
4 defendant XIAOMEI XIN committed the crime of MONEY LAUNDERING, in violation of
5 Penal Code section 186.10(a)(2), a Felony, in that she did willfully and unlawfully conduct or
6 attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to
7 wit: \$7,100, Bank of America Account Number Ending #5183 and JP Morgan Chase Bank
8 Account Number Ending #0331, with the knowledge the monetary instrument represented the
9 proceeds of criminal activity.

10 **COUNT TWENTY-SIX**
11 **(MONEY LAUNDERING)**

12 On or about or between September 5, 2023 and September 7, 2023, in the county of
13 Sacramento, defendant XIAOMEI XIN committed the crime of MONEY LAUNDERING, in
14 violation of Penal Code section 186.10(a)(2), a Felony, in that she did willfully and unlawfully
15 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
16 period, to wit: \$6,032.26, Bank of America Account Number Ending #5183 and JP Morgan
17 Chase Bank Account Number Ending #0331, with the knowledge the monetary instrument
18 represented the proceeds of criminal activity.

19 **COUNT TWENTY-SEVEN**
20 **(MONEY LAUNDERING)**

21 On or about or between December 14, 2023 and December 20, 2023, in the county of
22 Sacramento, defendant XIAOMEI XIN committed the crime of MONEY LAUNDERING, in
23 violation of Penal Code section 186.10(a)(2), a Felony, in that she did willfully and unlawfully
24 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
25 period, to wit: \$5,180, Bank of America Account Number Ending #5183 and JP Morgan Chase
26 Bank Account Number Ending #0331, with the knowledge the monetary instrument represented
27 the proceeds of criminal activity.

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1 **COUNT TWENTY-EIGHT**
2 **(MONEY LAUNDERING)**

3 On or about or between March 28, 2024 and April 2, 2024, in the county of Sacramento,
4 defendant XIAOMEI XIN committed the crime of MONEY LAUNDERING, in violation of
5 Penal Code section 186.10(a)(2), a Felony, in that she did willfully and unlawfully conduct or
6 attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to
7 wit: \$5,560, Bank of America Account Number Ending #5183, with the knowledge the monetary
8 instrument represented the proceeds of criminal activity.

9 **COUNT TWENTY-NINE**
10 **(MONEY LAUNDERING)**

11 On or about or between June 11, 2024 and June 17, 2024, in the county of Sacramento,
12 defendant XIAOMEI XIN committed the crime of MONEY LAUNDERING, in violation of
13 Penal Code section 186.10(a)(2), a Felony, in that she did willfully and unlawfully conduct or
14 attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to
15 wit: \$5,920, Bank of America Account Number Ending #5183 and East West Bank Account
16 Number Ending #8228, with the knowledge the monetary instrument represented the proceeds of
17 criminal activity.

18 **COUNT THIRTY**
19 **(MONEY LAUNDERING)**

20 On or about or between October 11, 2022 and October 17, 2022, in the county of
21 Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in
22 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
23 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
24 period, to wit: \$5,150, Bank of America Account Number Ending #6543, with the knowledge the
25 monetary instrument represented the proceeds of criminal activity.

26 **COUNT THIRTY-ONE**
27 **(MONEY LAUNDERING)**

28 On or about or between October 26, 2022 and November 1, 2022, in the county of
Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in

1 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
2 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
3 period, to wit: \$5,240, Bank of America Account Number Ending #6543, with the knowledge the
4 monetary instrument represented the proceeds of criminal activity.

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6 **COUNT THIRTY-TWO**
(MONEY LAUNDERING)

7 On or about December 30, 2022, in the county of Sacramento, defendant WEI HUANG
8 committed the crime of MONEY LAUNDERING, in violation of Penal Code section
9 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct
10 financial transactions totaling \$5,000 or more within a seven day period, to wit: \$5,500, Bank of
11 America Account Number Ending #6543, with the knowledge the monetary instrument
12 represented the proceeds of criminal activity.

13 **COUNT THIRTY-THREE**
14 **(MONEY LAUNDERING)**

15 On or about and between May 30, 2023 and June 5, 2023, in the county of Sacramento,
16 defendant WEI HUANG committed the crime of MONEY LAUNDERING, in violation of Penal
17 Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to
18 conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$6,140,
19 Bank of America Account Number Ending #6543, with the knowledge the monetary instrument
20 represented the proceeds of criminal activity.

21 **COUNT THIRTY-FOUR**
22 **(MONEY LAUNDERING)**

23 On or about and between September 7, 2023 and September 12, 2023, in the county of
24 Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in
25 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
26 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
27 period, to wit: \$5,900, Bank of America Account Number Ending #6543, with the knowledge the
28 monetary instrument represented the proceeds of criminal activity.

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**COUNT THIRTY-FIVE
(MONEY LAUNDERING)**

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On or about and between December 12, 2023 and December 18, 2023, in the county of Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$5,180, Bank of America Account Number Ending #6543, with the knowledge the monetary instrument represented the proceeds of criminal activity.

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**COUNT THIRTY-SIX
(MONEY LAUNDERING)**

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On or about or between January 16, 2024 and January 22, 2024, in the county of Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$5,300, Bank of America Account Number Ending #6543, with the knowledge the monetary instrument represented the proceeds of criminal activity.

**COUNT THIRTY-SEVEN
(MONEY LAUNDERING)**

On or about or between April 1, 2024 and April 3, 2024, in the county of Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$5,470, Bank of America Account Number Ending #6543, with the knowledge the monetary instrument represented the proceeds of criminal activity.

**COUNT THIRTY-EIGHT
(MONEY LAUNDERING)**

On or about or between April 30, 2024 and May 6, 2024, in the county of Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully conduct or attempt to

1 conduct financial transactions totaling \$5,000 or more within a seven day period, to wit: \$9,600,
2 Bank of America Account Number Ending #6543, with the knowledge the monetary instrument
3 represented the proceeds of criminal activity.

4 **COUNT THIRTY-NINE**
5 **(MONEY LAUNDERING)**

6 On or about or between September 3, 2024 and September 4, 2024, in the county of
7 Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in
8 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
9 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
10 period, to wit: \$7,510, Bank of America Account Number Ending #6543 and JP Morgan Chase
11 Bank Account Number Ending #2363, with the knowledge the monetary instrument represented
12 the proceeds of criminal activity.

13 **COUNT FORTY**
14 **(MONEY LAUNDERING)**

15 On or about or between September 5, 2024 and September 9, 2024, in the county of
16 Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in
17 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
18 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
19 period, to wit: \$5,800, Bank of America Account Number Ending #6543, with the knowledge the
20 monetary instrument represented the proceeds of criminal activity.

21 **COUNT FORTY-ONE**
22 **(MONEY LAUNDERING)**

23 On or about or between October 29, 2024 and November 4, 2024, in the county of
24 Sacramento, defendant WEI HUANG committed the crime of MONEY LAUNDERING, in
25 violation of Penal Code section 186.10(a)(2), a Felony, in that he did willfully and unlawfully
26 conduct or attempt to conduct financial transactions totaling \$5,000 or more within a seven day
27 period, to wit: \$5,800, Bank of America Account Number Ending #6543 and JP Morgan Chase
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1 Bank Account Number Ending #2363, with the knowledge the monetary instrument represented
2 the proceeds of criminal activity.

3 **COUNT FORTY-TWO**
4 **(MORTGAGE FRAUD)**

5 On or about and between September 8, 2024 and September 9, 2024, in the County of
6 Sacramento, defendant XIAOMEI XIN committed the crime of MORTGAGE FRAUD, in
7 violation of Penal Code section 532f(a)(1), a Felony, in that she did willfully and unlawfully
8 make a misstatement, misrepresentation, or omission during the mortgage lending process with
9 the intention that it be relied on by a mortgage lender, borrower, or any other party to the
10 mortgage lending process.

11 **COUNT FORTY-THREE**
12 **(FAILED TO FILE INCOME TAX RETURN OR FILED FALSE TAX RETURN WITH**
13 **INTENT TO EVADE)**

14 On or about April 12, 2023, in the County of Sacramento, GUO YANG, person who, within
15 the time required, willfully and with like intent, made, rendered, signed, or verified any false or
16 fraudulent return or statement or supplied any false or fraudulent information, with intent to evade
17 any tax, in violation of Revenue and Taxation Code section 19706, a felony, to wit: underreported
18 income on his 2022 California income tax return by \$320,274 resulting in taxes and penalties
19 owed to the California Franchise Tax Board in the amount of \$49,274.

20 **COUNT FORTY-FOUR**
21 **(FAILED TO FILE INCOME TAX RETURN OR FILED FALSE TAX RETURN WITH**
22 **INTENT TO EVADE)**

23 On or about March 29, 2024, in the County of Sacramento, GUO YANG, person who,
24 within the time required, willfully and with like intent, made, rendered, signed, or verified any
25 false or fraudulent return or statement or supplied any false or fraudulent information, with intent
26 to evade any tax, in violation of Revenue and Taxation Code section 19706, a felony, to wit:
27 underreported income on his 2023 California income tax return by \$134,972.40 resulting in taxes
28 and penalties owed to the California Franchise Tax Board in the amount of \$14,767.

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COUNT FORTY-FIVE
(FAILED TO FILE INCOME TAX RETURN OR FILED FALSE TAX RETURN WITH INTENT TO EVADE)

On or about April 15, 2023, in the County of Sacramento, XIAOMEI XIN, person who, within the time required, willfully failed to file a return, with intent to evade any tax, in violation of Revenue and Taxation Code section 19706, a felony, to wit: failed to file her 2022 California income tax return and unreported income in the amount of \$22,594 resulting in taxes and penalties owed to the California Franchise Tax Board in the amount of \$187.

COUNT FORTY-SIX
(FAILED TO FILE INCOME TAX RETURN OR FILED FALSE TAX RETURN WITH INTENT TO EVADE)

On or about April 15, 2023, in the County of Sacramento, XIAOMEI XIN, person who, within the time required, willfully failed to file a return, with intent to evade any tax, in violation of Revenue and Taxation Code section 19706, a felony, to wit: failed to file her 2023 California income tax return and unreported income in the amount of \$123,355.47 resulting in taxes and penalties owed to the California Franchise Tax Board in the amount of \$13,094.

COUNT FORTY-SEVEN
(FAILED TO FILE INCOME TAX RETURN OR FILED FALSE TAX RETURN WITH INTENT TO EVADE)

On or about February 25, 2023, in the County of Sacramento, WEI HUANG, person who, within the time required, willfully and with like intent, made, rendered, signed, or verified any false or fraudulent return or statement or supplied any false or fraudulent information, with intent to evade any tax, in violation of Revenue and Taxation Code section 19706, a felony, to wit: underreported income on his 2022 California income tax return by \$83,458 resulting in taxes and penalties owed to the California Franchise Tax Board in the amount of \$6,595.

COUNT FORTY-EIGHT
(FAILED TO FILE INCOME TAX RETURN OR FILED FALSE TAX RETURN WITH INTENT TO EVADE)

On or about February 17, 2024, in the County of Sacramento, WEI HUANG, person who, within the time required, willfully and with like intent, made, rendered, signed, or verified any false or fraudulent return or statement or supplied any false or fraudulent information, with intent

1 to evade any tax, in violation of Revenue and Taxation Code section 19706, a felony, to wit:
2 underreported income on his 2023 California income tax return by \$82,753 resulting in taxes
3 owed to the California Franchise Tax Board in the amount of \$6,232.

4 **SPECIAL ALLEGATION**

5 **(AGGRAVATED WHITE COLLAR CRIME WITH LOSS OVER \$100,000)**

6 It is further alleged as to Counts 24 through 29, 42, and 45 through 46, that the offenses are
7 related felonies, a material element of which is fraud, which involved a pattern of related felony
8 conduct, and the pattern of related felony conduct resulted in the loss by the California Franchise
9 Tax Board, the State of California and General Mortgage Capital Corporation of more than five
10 hundred thousand dollars (\$500,000), thus subjecting XIAOMEI XIN to the additional
11 punishment provided for in Penal Code section 186.11(a)(2).

12 **SPECIAL ALLEGATION**

13 **(SEX OFFENSES)**

14 It is further alleged, as to Counts one through six that in the commission or attempted
15 commission of the above felony offenses, the defendants, are ineligible for probation or
16 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

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18 **NOTICE:** As to Counts one through six, committed by the said defendants, GUO YANG, LIN
19 ZHANG, XIAOMEI XIN, and WEI HUANG, it is further alleged, pursuant to California Rules of
20 Court 4.421(a)(3), the victim or victims was/were particularly vulnerable.

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22 **NOTICE:** As to Counts one through forty-eight, committed by the said defendants, GUO
23 YANG, LIN ZHANG, XIAOMEI XIN, and WEI HUANG, it is further alleged, pursuant to
24 California Rules of Court 4.421(a)(8), that the manner in which the crimes were carried out
25 indicate planning sophistication, or professionalism.

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1 **NOTICE:** As to Counts one through six, committed by the said defendants, GUO YANG and
2 XIAOMEI XIN, it is further alleged, pursuant to California Rules of Court 4.421(a)(4) the
3 defendants induced others to participate in the commission of the crime or occupied a position of
4 leadership or dominance of other participants in its commission.
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6 **NOTICE:** It is further alleged that prison custody time for counts one through six is to be served
7 in state prison pursuant to Penal Code section 1170.1(a).
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9 **NOTICE:** Conviction of any of these offenses for counts one through forty-eight will require the
10 defendants to provide specimens and samples pursuant to Penal Code section 296. Willful refusal
11 to provide the samples and impressions is a crime.
12

13 **NOTICE:** Pursuant to Penal Code section 1170(f), any allegation making a defendant ineligible
14 to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to
15 Penal Code section 1385.
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17 **NOTICE:** As to Counts one through forty-one, committed by the said defendants, GUO YANG,
18 LIN ZHANG, XIAOMEI XIN, and WEI HUANG, it is further alleged, pursuant to Penal Code
19 sections 186.2(a)(12) and 186.2(a)(22), 186.2(a)(25), and 186.3(a), that having engaged in at least
20 two incidents of criminal profiteering, are subject to the forfeiture of all proceeds of criminal
21 profiteering including any property interest, whether tangible or intangible, and all things of value
22 that may have been received in exchange from proceeds derived from the pattern of criminal
23 profiteering activity.
24

25 **NOTICE:** Pursuant to Revenue and Taxation Code section 17282; in computing taxable income,
26 deductions, including deductions for cost of goods sold, shall not be allowed to any taxpayer from
27 any of his or her gross income directly derived from any act or omission of criminal profiteering
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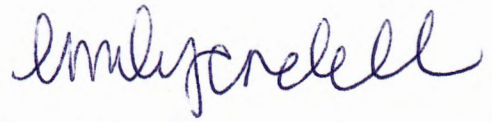
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activity, as defined in Section 186.2 of the Penal Code, to include acts of pimping, pandering and money laundering.

Dated: 2/10/2025

Respectfully submitted,

ROB BONTA
Attorney General of California
TIFFANY J. SUSZ
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