

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 26- 2 Erie
)	
SHUHUA QIU)	(18 U.S.C. §§ 371, 1952(a)(3),
CHUNLONG LIN)	1957(a), 2421, and 2424(a))
LIJUAN ZHAO)	
MING ZHAI)	[UNDER SEAL]

INDICTMENT

FILED

The grand jury charges:

JAN 20 2026

COUNT ONE

CLERK U.S. DISTRICT COURT
WEST DIST OF PENNSYLVANIA

1. At all times relevant to this Indictment, unless otherwise indicated:

a. Defendants SHUHUA QIU, CHUNLONG LIN, LIJUAN ZHAO, and MING ZHAI engaged in conduct relevant to the offenses described herein in the Western District of Pennsylvania, the Eastern District of New York, and elsewhere.

b. Beginning on a date unknown to the grand jury but at least since in and around November 2023, the defendants owned, managed, promoted, carried on, and facilitated illicit massage businesses (IMBs), massage parlors, and spas that served as fronts for unlawful businesses in which persons promoted and engaged in commercial sex, including the following, collectively referred to as the QIU/LIN IMBs:

i. Beginning in at least November 2023 and continuing to on or about August 20, 2025, SHUHUA QIU owned, and SHUHUA QIU and LIJUAN ZHAO managed, a business called “Sunny Spa,” located at 4615 Buffalo Road, Erie, Pennsylvania;

ii. Beginning in at least January 2024 and continuing to on or about the date of this Indictment, CHUNLONG LIN owned and managed a business called “Point Spa,” located at 4432 Peach Street, Erie, Pennsylvania; and

iii. Beginning on or about August 20, 2025, and continuing to on or about the date of this Indictment, LIJUAN ZHAO owned and managed “Sunny Spa,” located at 4615 Buffalo Road, Erie, Pennsylvania.

c. The defendants opened, managed, and otherwise used bank accounts in connection with the operation of QIU/LIN IMBs, including accounts at JPMorgan Chase Bank, Huntington Bank, and Bank of America.

Relevant State Prostitution Laws

2. As relevant to this Indictment, the Commonwealth of Pennsylvania criminalizes the following prostitution offenses: Pennsylvania Consolidated Statutes, Title 18, Sections 5902(a) (Prostitution), 5902(b)(1)-(8) (Promoting prostitution), and 5902(d) (Living off prostitutes).

Facilities of Interstate and Foreign Commerce

3. The following constitute some, but not all, of the facilities of interstate and foreign commerce that were used by the defendants to promote, manage, establish, carry on, or otherwise facilitate the business of the QIU/LIN IMBs:

a. The Internet, including but not limited to advertisement websites, including “skipthegames.com,” where individuals and businesses posted classified-type advertisements;

b. Internet service providers, including Charter Communications, Breezeline, and Spectrum;

c. National telephone and cellular networks and global communication

companies, including AT&T and T-Mobile;

d. Smartphone applications, including WeChat, multi-purpose instant messaging, social media, and mobile payment applications that provide, among other services, text messaging, voice messaging, broadcast messaging, video conferencing, and sharing of photographs, videos, and documents globally. Users of WeChat can promote the business of IMBs, including by facilitating communication about jobs at, and the management of, IMBs;

e. Automated teller machines (ATMs), devices that permit bank-account holders to withdraw or deposit money throughout the country, regardless of where the holder's account is located;

f. Merchant processing services and credit card processing equipment, which are services and devices that permit businesses and individuals to process debit and credit card payments and receive those payments into bank accounts;

g. Mobile payment services, including those offered through Zelle, which permit users to utilize smartphones, wireless service, and the Internet to make payments and transfer money;

h. Financial institutions, as defined by 18 U.S.C. § 1956(c)(6), including JPMorgan Chase Bank, Huntington Bank, and Bank of America; and

i. The mail, which can be used to send and receive correspondence and records associated with the IMBs.

The Conspiracy and its Objects

4. Beginning at a time unknown to the grand jury, but at least no later than in and around November 2023, and continuing thereafter to on or about the date of this Indictment, in the Western District of Pennsylvania and elsewhere, the defendants, SHUHUA QIU, CHUNLONG LIN, LIJUAN ZHAO, and MING ZHAI, together and with others known and

unknown to the grand jury, knowingly conspired, confederated, and agreed to commit offenses against the United States, in violation of the following:

a. Title 18, United States Code, Section 1952(a)(3), which makes it a crime to use a facility of interstate or foreign commerce to facilitate, promote, manage, establish, or carry on an unlawful activity;

b. Title 18, United States Code, Section 2421, which makes it a crime to transport any individual in interstate or foreign commerce with the intent that the individual engages in prostitution or any sexual activity for which any person can be charged; and

c. Title 18, United States Code, Section 2424(a), which makes it a crime for anyone to fail to file a factual statement concerning an alien person kept, harbored, or controlled for prostitution.

Manner and Means of the Conspiracy

5. It was a part of the conspiracy that, in the Western District of Pennsylvania and elsewhere:

a. Members of the conspiracy did travel in interstate and foreign commerce, and did use the mail and any facility in interstate and foreign commerce, with the intent to distribute the proceeds of, and to otherwise promote, manage, establish, and carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, to wit, prostitution offenses in violation of the laws of the Commonwealth of Pennsylvania.

b. Members of the conspiracy unlawfully and knowingly would and did transport individuals in interstate and foreign commerce, with intent that such individuals engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense.

c. Members of the conspiracy would and did fail to file with the

Commissioner of Immigration and Naturalization a statement in writing setting forth certain information after commencing to keep, maintain, control, support, and harbor in a house and place for the purpose of prostitution and other immoral purposes individuals, knowing or in reckless disregard of the fact that said individuals were aliens.

d. Members of the conspiracy established, owned, and managed business enterprises involving prostitution, including Sunny Spa, Point Spa, and Fun Spot, purporting said business enterprises to be legitimate massage parlors.

e. Members of the conspiracy charged customers “house fees,” initial fees paid to IMBs, which enabled customers to meet with a “masseuse,” and customers paid “tips” in exchange for commercial sex acts they engaged in with IMB employees. In many instances, the “tips” were paid in amounts between 100% and 400% of the initial “house fee.”

f. Members of the conspiracy applied for, used, and caused others to use credit card processing equipment and merchant services processing services to process and collect QIU/LIN IMB customers' credit and debit card payments related to the “house fees” and “tips.”

g. Members of the conspiracy also accepted cash from QIU/LIN IMB customers as payments related to the “house fees” and “tips.”

h. Members of the conspiracy created and maintained records related to QIU/LIN IMB customers to promote and carry on the businesses.

i. Members of the conspiracy leased commercial properties and paid for the utilities and Internet connectivity at those properties for the purposes of facilitating and promoting the QIU/LIN IMBs.

j. Members of the conspiracy caused individuals engaged in prostitution to

be housed and reside within the commercial properties leased by the QIU/LIN IMBs and within efficiencies located adjacent to the commercial properties leased by the QIU/LIN IMBs.

k. Members of the conspiracy leased apartments and commercial locations for the purpose of housing employees of the QIU/LIN IMBs.

l. Members of the conspiracy used the Internet, cellular telephones, smartphone applications, and e-mail accounts to pay for, post, and cause to be posted advertisements to facilitate and promote the business of the QIU/LIN IMBs.

m. Members of the conspiracy used the Internet, cellular telephones, smartphone applications, and e-mail accounts to communicate with each other, with employees of the QIU/LIN IMBs, with QIU/LIN IMB customers and prospective customers, and with others, to manage, promote, carry on, facilitate, and profit from the business of the QIU/LIN IMBs.

n. Members of the conspiracy used the Internet, cellular telephones, smartphone applications, and e-mail accounts to promote, carry on, and facilitate the business of the QIU/LIN IMBs by, among other things, communicating with members of the conspiracy and individuals associated with other suspected IMBs about the management of employees, commercial sex, and IMB customers; receiving and paying bills for advertisements, utilities, rent, and other services related to the QIU/LIN IMBs and related residential properties; communicating directly with QIU/LIN customers and prospective customers; and managing finances associated with the QIU/LIN IMBs.

o. Members of the conspiracy used financial institutions to deposit proceeds derived from the QIU/LIN IMBs into bank accounts controlled by members of the conspiracy.

p. Members of the conspiracy used QIU/LIN IMB-related bank accounts and

online banking services to hold and transfer proceeds between the QIU/LIN IMBs and to facilitate, carry on, and promote the business enterprises involving prostitution by paying for rent, utilities, Internet connectivity, telephone services, and supplies for the QIU/LIN IMBs and related residential properties where IMB employees lived.

q. Members of the conspiracy used the mail to promote the business of the QIU/LIN IMBs, including by sending checks to pay for rent and utilities at the QIU/LIN IMBs and related residential properties.

Overt Acts

6. In furtherance of the conspiracy, and to achieve the objects of the conspiracy, the defendants, SHUHUA QIU, CHUNLONG LIN, LIJUAN ZHAO, and MING ZHAI, did commit and cause to be committed, the following overt acts, among others, in the Western District of Pennsylvania and elsewhere:

a. On or about November 20, 2023, SHUHUA QIU filed articles of incorporation with the Commonwealth of Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations detailing the formation of Sunny Spa, Inc., and paid an incorporation fee.

b. On or about January 26, 2024, CHUNLONG LIN filed articles of incorporation with the Commonwealth of Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations detailing the formation of Point Spa, Inc., and paid an incorporation fee.

c. On or about June 16, 2024, CHUNLONG LIN and MING ZHAI transported a female QIU/LIN IMB employee from Sunny Spa to Point Spa and then across the state line into New York.

d. On or about May 2, 2025, SHUHUA QIU filed an annual report with the

Commonwealth of Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations, and paid a report fee.

e. On or about August 13, 2025, MING ZHAI drove a female QUI/LIN IMB employee from Flushing, New York into the Western District of Pennsylvania.

f. On or about August 20, 2025, LIJUAN ZHAO filed articles of amendment with the Commonwealth of Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations amending the business owner of Sunny Spa, Inc. to LIJUAN ZHAO and paid a filing fee.

g. On or about the dates below, members of the conspiracy opened bank accounts, which they, and others known and unknown to the grand jury, used, along with online banking services, to pay for rent, utilities, supplies, and maintenance at the QIU/LIN IMBs and related residential properties, where IMB employees lived, to receive, transfer between and among accounts they controlled, and to spend or withdraw proceeds of the QIU/LIN IMBs, which facilitated the business of the QIU/LIN IMBs:

i. On or about December 18, 2023, SHUHUA QIU opened the account ending in 0169 in the name of Sunny Spa, Inc., at JPMorgan Chase Bank.

ii. On or about January 1, 2024, CHUNLONG LIN opened the account ending in 6147 in the name of Point Spa, Inc., at Huntington Bank.

iii. On or about March 18, 2025, CHUNLONG LIN opened the account ending in 5998 in the name of Point Spa, Inc., at JPMorgan Chase Bank.

iv. On or about August 10, 2025, LUJUAN ZHAO opened the account ending in 1410 in the name of Sunny Spa, Inc., at Bank of America.

h. On or about the dates below, members of the conspiracy paid for and

caused to be posted online advertisements facilitating and promoting the business of the QIU/LIN IMBs, including advertisements on “skipthegames.com,” where individuals and businesses could post classified-type advertisements, managed through the third-party advertising agency Caliaart Ad, Inc., including, but not limited to the following payments:

i. A payment by CHUNLONG LIN of \$400.00 from a Huntington Bank account ending in 6147, in the name of Point Spa, Inc., on or about May 1, 2024;

ii. A payment by CHUNLONG LIN of \$200.00 from a Huntington Bank account ending in 6147, in the name of Point Spa, Inc., on or about June 6, 2024;

iii. A payment by SUHUA QIU of \$200.00 from a JPMorgan Chase Bank account ending in 0169, in the name of Sunny Spa Inc., on or about July 10, 2024;

iv. A payment by CHUNLONG LIN of \$200.00 from a Huntington Bank account ending in 6147, in the name of Point Spa, Inc., on or about August 10, 2024;

v. A payment by CHUNLONG LIN of \$400.00 from a Huntington Bank account ending in 6147, in the name of Point Spa, Inc., on or about September 11, 2024;

and

vi. A payment by SUHUA QIU of \$300.00 from a JPMorgan Chase Bank account ending in 0169, in the name of Sunny Spa Inc., on or about April 14, 2025.

i. On or about the dates below, members of the conspiracy entered and assumed leases, and paid regular financial obligations for those leases, for commercial properties located in Pennsylvania from which they operated the QIU/LIN IMBs and promoted, facilitated, and carried on business enterprises involving prostitution, including the following specific payments:

i. A payment by CHUNLONG LIN of \$2182.35 from a Huntington Bank account ending in 6147, in the name of Point Spa, Inc., payable to “Wayward Tattoo,” on or about October 30, 2024;

ii. A payment by CHUNLONG LIN of \$2,181.00 from a Huntington Bank account ending in 6147, in the name of Point Spa, Inc., payable to “Wayward Tattoo,” on or about December 30, 2024;

iii. A payment by SUHUA QIU of \$1500.00 from a JPMorgan Chase Bank account ending in 0169, in the name of Sunny Spa Inc., payable to “Prosper Properties,” on or about January 22, 2025;

iv. A payment by SUHUA QIU of \$1500.00 from a JPMorgan Chase Bank account ending in 0169, in the name of Sunny Spa Inc., payable to “Prosper Properties,” on or about February 22, 2025;

v. A payment by LIJUAN ZHAO of \$1500.00 from a Bank of America account ending in 1410, in the name of Sunny Spa Inc., payable to “Prosper Properties,” on or about October 22, 2025; and

vi. A payment by LIJUAN ZHAO of \$700.00 from a Bank of America Bank account ending in 1410, in the name of Sunny Spa Inc., payable to “Prosper Properties,” on or about November 1, 2025.

In violation of Title 18, United States Code, Section 371.

COUNTS TWO - FOUR

The grand jury further charges that:

7. The factual allegations contained in paragraphs 1 through 6 of this Indictment are incorporated herein by reference.

8. On the dates set forth below, in the Western District of Pennsylvania, the defendants did knowingly use and cause to be used a facility in interstate and foreign commerce, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, that is, business enterprises involving prostitution, in violation of the laws of the Commonwealth of Pennsylvania, and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity:

COUNT	DEFENDANT(S)	USE OF FACILITY
2	SHUHUA QIU	On or about November 20, 2023, SHUHUA QIU used the Internet to file articles of incorporation with the Commonwealth of Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations detailing the formation of Point Spa, Inc., and to pay an incorporation fee.
3	CHUNLONG LIN	On or about January 26, 2024, CHUNLONG LIN used the Internet to file articles of incorporation with the Commonwealth of Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations detailing the formation of Point Spa, Inc., and to pay an incorporation fee.
4	LIJUAN ZHAO	On or about August 20, 2025, LIJUAN ZHAO used the Internet to file articles of amendment with the Commonwealth of Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations amending the business owner of Sunny Spa, Inc. to LIJUAN ZHAO and pay a filing fee.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT FIVE

The grand jury further alleges:

9. The factual allegations contained in paragraphs 1 through 8 of this Indictment are incorporated herein by reference.

10. Between on or about November 20, 2023, and the date of this Indictment, in the Western District of Pennsylvania, the defendants, SHUHUA QIU and LIJUAN ZHAO, did keep, maintain, control, support, and harbor in any house and place; to wit: Sunny Spa, 4615 Buffalo Road, Erie, Pennsylvania, for the purpose of prostitution, and for any other immoral purpose, individuals, knowing and in reckless disregard of the fact that the individuals were aliens, and did fail to file within five business days after commencing to keep, maintain, control, support, and harbor in said house and place, a written statement with the Commissioner of Immigration and Naturalization, and his successor, setting forth the names of such individuals, the place at which the individuals are kept, and all the facts as to the date of the individuals' entry into the United States, the port through which the individuals entered, the individuals' ages, nationality, and parentage, and concerning the individuals' procurement to come to this country within the knowledge of the defendants, SHUHUA QIU AND LIJUAN ZHAO.

In violation of Title 18, United States Code, Section 2424(a).

COUNT SIX

The grand jury further alleges:

11. The factual allegations contained in paragraphs 1 through 10 of this Indictment are incorporated herein by reference.

12. Between on or about January 26, 2024, and the date of this Indictment, in the Western District of Pennsylvania, the defendant, CHUNLONG LIN, did keep, maintain, control, support, and harbor in any house and place; to wit: Point Spa, 4432 Peach Street, Erie, Pennsylvania, for the purpose of prostitution, and for any other immoral purpose, individuals, knowing and in reckless disregard of the fact that the individuals were aliens, and did fail to file within five business days after commencing to keep, maintain, control, support, and harbor in said house and place, a written statement with the Commissioner of Immigration and Naturalization, and his successor, setting forth the names of such individuals, the place at which the individuals are kept, and all the facts as to the date of the individuals' entry into the United States, the port through which the individuals entered, the individuals' ages, nationality, and parentage, and concerning the individuals' procurement to come to this country within the knowledge of the defendant, CHUNLONG LIN.

In violation of Title 18, United States Code, Section 2424(a).

COUNT SEVEN

The grand jury further charges:

13. The factual allegations contained in paragraphs 1 through 12 of this Indictment are incorporated herein by reference.

14. On or about August 13, 2025, in the Western District of Pennsylvania and elsewhere, the defendant, MING ZHAI, unlawfully and knowingly transported an individual in interstate commerce, with intent that such individual engage in prostitution and in sexual activity for which any person can be charged with a criminal offense, and attempted so to do, to wit, the defendant, MING ZHAI, transported a woman from Flushing, New York, to the Western District of Pennsylvania for the purpose of engaging in prostitution.

In violation of Title 18, United States Code, Section 2421.

COUNTS EIGHT – NINE

The grand jury further alleges:

15. The factual allegations contained in paragraphs 1 through 14 of this Indictment are incorporated herein by reference.

16. On or about the following dates, in the Western District of Pennsylvania, the defendant, SHUHUA QIU, did knowingly engage in the following monetary transactions, each such transaction affecting interstate commerce, and each in criminally derived property with a value greater than \$10,000, which property was derived from specified unlawful activity, in that the defendant, SHUHUA QIU, did engage in the following monetary transactions knowing that the funds were derived from criminal offenses, when in fact said funds were derived from the offense at Count One; each such transaction being its own count of this Indictment:

COUNT	DEFENDANT	TRANSACTION
8	SHUHUA QIU	Transfer of a check in the amount of \$20,000, on or about March 28, 2024, from an account at JPMorgan Chase Bank ending in 7777 to an account at East West Bank ending in 3926 in payment of the outstanding loan balance on the real estate located at 14065 Beech Avenue, Unit 6P, Flushing, New York, 11355.
9	SHUHUA QIU	Transfer of a check in the amount of \$40,000, on or about November 6, 2024, from an account at JPMorgan Chase Bank ending in 7777 to an account at East West Bank ending in 3926 in payment of the outstanding loan balance on the real estate located at 14065 Beech Avenue, Unit 6P, Flushing, New York, 11355.

All in violation of Title 18, United States Code, Section 1957(a).

FORFEITURE ALLEGATIONS

17. The United States hereby gives notice to the defendants charged in Counts One through Nine that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 2428, and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses, including, but not limited to, the following described property:

a. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 14065 Beech Avenue, Apartment 6P, Flushing, New York, 11355.

b. A Black Honda Civic, bearing Florida registration 14BIRR, with the vehicle identification number 2HGFE2F58NH529145.

c. All United States currency, funds or other monetary instruments credited to account number ending in 0169 in the name of Sunny Spa, Inc., located at JP Morgan Chase Bank.

d. All United States currency, funds or other monetary instruments credited to account number ending in 6147 in the name of Point Spa, Inc., located at Huntington Bank.

e. All United States currency, funds or other monetary instruments credited to account number ending in 5998 in the name of Point Spa, Inc., located at JP Morgan Chase Bank.

f. All United States currency, funds or other monetary instruments credited to account number ending in 1410 in the name of Sunny Spa, Inc., located at Bank of America.

g. All United States currency, funds or other monetary instruments credited

to account number ending in 7777, located at JP Morgan Chase Bank.

18. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

A True Bill,


FOREPERSON



TROY RIVETTI
First Assistant United States Attorney
PA ID No. 56816



PAUL S. SELLERS
Assistant United States Attorney
PA ID No. 316175

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

SHUHUA QIU

Criminal No. 26-2 Erie

[UNDER SEAL]

CERTIFICATION AND NOTICE FOR FILING PRETRIAL MOTIONS

I hereby certify that I have been notified by the United States Magistrate Judge that all pretrial motions must be filed within fourteen (14) days of Arraignment unless the Court extends the time upon written application made within said fourteen (14) day period.

Date

Attorney for Defendant
SHUHUA QIU

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

SHUHUA QIU

Criminal No. 26-2 Erie

[UNDER SEAL]

ARRAIGNMENT PLEA

Defendant SHUHUA QIU

being arraigned, pleads _____

in open Court this _____ day of

_____, 20 _____

(Defendant's Signature)

(Attorney for Defendant)

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 26-2 Erie

SHUHUA QIU

[UNDERSEAL]

CRIMINAL CASE INFORMATION SHEET

Division: Erie

County in which first offense cited occurred: Erie

Related to No. _____

Judge: _____

- CATEGORY: 1. Narcotics and Other Controlled Substances (Defs: 1-2 3-9 10+)
2. Fraud and Property Offenses (Defs: 1-2 3-9 10+)
3. Crimes of Violence
4. Sex Offenses
5. Firearms and Explosives
6. Immigration
7. All Others

Previous Proceedings before Magistrate Judge: _____

Case No.: _____

PLEASE INCORPORATE MAGISTRATE CASE WITH CRIMINAL CASE

Defendant is in custody is not in custody

Custody is State Federal Name of Institution: _____

Defendant is is not serving a term of Supervised Release

Case No. _____ Judge: _____

I certify that to the best of my knowledge the above entries are true and correct.

DATE: 01/20/2026

/s/ Paul S. Sellers
PAUL S. SELLERS
Assistant U.S. Attorney
PA ID No. 316175

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CHUNLONG LIN

Criminal No. *26-7* Erie

[UNDER SEAL]

CERTIFICATION AND NOTICE FOR FILING PRETRIAL MOTIONS

I hereby certify that I have been notified by the United States Magistrate Judge that all pretrial motions must be filed within fourteen (14) days of Arraignment unless the Court extends the time upon written application made within said fourteen (14) day period.

Date

Attorney for Defendant
CHUNLONG LIN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CHUNLONG LIN

Criminal No. 26-2 Erie

[UNDER SEAL]

ARRAIGNMENT PLEA

Defendant CHUNLONG LIN

being arraigned, pleads _____

in open Court this _____ day of

_____, 20 _____

(Defendant's Signature)

(Attorney for Defendant)

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 26-2 Erie

CHUNLONG LIN

[UNDERSEAL]

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DATE: 01/20/2026

/s/ Paul S. Sellers

PAUL S. SELLERS

Assistant U.S. Attorney

PA ID No. 316175

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

LIJUAN ZHAO

Criminal No. *26-2* Erie

[UNDER SEAL]

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Date

Attorney for Defendant
LIJUAN ZHAO

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

LIJUAN ZHAO

Criminal No. 26-2 Erie

[UNDER SEAL]

ARRAIGNMENT PLEA

Defendant LIJUAN ZHAO

being arraigned, pleads _____

in open Court this _____ day of

_____, 20 _____

(Defendant's Signature)

(Attorney for Defendant)

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 26-2 Erie

LIJUAN ZHAO

[UNDERSEAL]

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DATE: 01/20/2026

/s/ Paul S. Sellers

PAUL S. SELLERS

Assistant U.S. Attorney

PA ID No. 316175

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

MING ZHAI

Criminal No. 26-2 Erie

[UNDER SEAL]

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Attorney for Defendant
MING ZHAI

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

MING ZHAI

Criminal No. 26-2 Erie

[UNDER SEAL]

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being arraigned, pleads _____

in open Court this _____ day of

_____, 20 _____

(Defendant's Signature)

(Attorney for Defendant)

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

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MING ZHAI

[UNDERSEAL]

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Previous Proceedings before Magistrate Judge: _____

Case No.: _____

PLEASE INCORPORATE MAGISTRATE CASE WITH CRIMINAL CASE

Defendant is in custody is not in custody

Custody is State Federal Name of Institution: _____

Defendant is is not serving a term of Supervised Release

Case No. _____ Judge: _____

I certify that to the best of my knowledge the above entries are true and correct.

DATE: 01/20/2026

/s/ Paul S. Sellers
PAUL S. SELLERS
Assistant U.S. Attorney
PA ID No. 316175