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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

CHAU FANG LAM,  
aka CHAU FANG,  
aka QIU FANG LIN,  
aka CHAO FONG LAM,  
aka CHAU FONG HSU LAM,  
aka CHAU FAND LAM HSU,  
RUI XU, aka XU, aka RAY,  
XIN HSU, aka CINDY,  
ZHUO QIANG ZOU, aka KEN,  
  
Defendants.

) INDICTMENT  
)  
)  
)  
)  
) JUDGE

5 : 15 CR 179

CASE NO. \_\_\_\_\_  
Title 8, Sections  
1324(a)(1)(A)(iii),  
1324(a)(1)(A)(v)(I),  
1324(a)(1)(A)(v)(II),  
1324(a)(1)(B)(i), and Title 18,  
Section 982, United States Code

COUNT 1

**JUDGE LIOI**

The Grand Jury charges:

1. From in or about January 2003, and continuing until in or about November 2014, in the Northern District of Ohio, Eastern Division, CHAU FANG LAM, aka CHAU FANG, aka, aka QIU FANG LIN, aka CHAU FONG LAM, aka CHAU FONG HSU LAM, aka CHAU FAND LAM HSU, ("CHAU LAM"), RUI XU, aka XU, aka RAY ("RUI XU"), XIN HSU, aka CINDY ("XIN HSU"), and ZHUO QIANG ZOU, aka KEN ("ZHUO ZOU"), and other persons

known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree together and with each other to commit the following offense against the United States: knowingly and in reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law did conceal, harbor, and shield from detection such alien, to wit: CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU owned, operated, and managed the Royal Buffet and Grill located on Buchholzer Boulevard, Akron, Ohio, and at that restaurant employed at least ten undocumented and illegally present aliens, shielding them from detection and harboring them with knowledge of their illegal status through improper bookkeeping practices and failing to report their identities to the Ohio Department of Job and Family Services, and providing housing for multiple aliens at various locations and transportation, for the purpose of commercial advantage and private financial gain, in violation of Title 8, Section 1324(a)(1)(A)(iii), United States Code.

MANNER AND MEANS

2. It was part of the conspiracy that CHAU LAM had ownership interests in the Royal Buffet and Grill in Akron, Ohio, a restaurant specializing in Asian cuisine,.
3. It was further part of the conspiracy that CHAU LAM operated and managed the Royal Buffet and Grill through managers who were relatives, close friends and associates of CHAU LAM, including RUI XU, XIN HSU, and ZHUO ZOU, and others known and unknown to the Grand Jury.
4. It was further part of the conspiracy that CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU employed undocumented and illegally present aliens at the restaurant, routinely paying less than minimum wage or requiring the aliens to work for tips only.

5. It was further part of the conspiracy that CHAU LAM and RUI XU procured and paid for housing for illegally present and undocumented aliens employed at the restaurant.

6. It was further part of the conspiracy that CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU did not require employees at the restaurant to fill out Employment Eligibility Verification forms (I-9 forms) and present documents evidencing identity and employment authorization.

7. It was further part of the conspiracy that CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU employed both legal and illegal Asian employees as wait staff and chefs and illegal Hispanic employees as dishwashers.

8. It was further part of the conspiracy that RUI XU and ZHUO ZOU transported the illegally present aliens to and from \*\*\*5 Annapolis Avenue and the Royal Buffet and Grill, using a Maroon minivan registered to XIN HSU.

9. It was further part of the conspiracy that CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU paid employees with valid work authorization by check and employees, including the illegally present aliens, without valid work authorization in cash.

10. It was further part of the conspiracy that CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU, engaged in actions designed to harbor and shield illegally present and undocumented alien employees from detection by immigration authorities including, placing such aliens on the payroll using fraudulent identifications, paying such aliens in cash, by maintaining two payroll systems, and failing to accurately report all employees to the Ohio Department of Job and Family Services.

11. It was further part of the conspiracy that CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU committed the acts detailed in paragraphs 1 through 10 for the purpose of commercial advantage and private financial gain.

ACTS IN FURTHERANCE OF THE CONSPIRACY

12. In furtherance of the aforementioned conspiracy and to effect the objectives thereof, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU, and other members of the conspiracy performed the following overt acts, among others, in the Northern District of Ohio, Eastern Division:

A. In or about January 2003, Y.L., a person known to the Grand Jury, opened the Royal Buffet and Grill restaurant in Akron, Ohio.

B. On or about August 12, 2003, CHAU LAM purchased a single family residence located at \*\*\*5 Annapolis Avenue, Akron, Ohio.

C. On or about September 15, 2003, A.H., a person known to the Grand Jury, purchased a single family residence for CHAU LAM located at \*\*3 Annapolis Avenue, Akron, Ohio.

D. From in or about 2003 through 2014, XIN HSU paid and caused others to pay the First Energy electric bills for the residence at \*\*\*5 Annapolis Avenue with checks drawn on the business account of Royal Buffet.

E. From in or about 2003 through 2014, CHAU LAM paid and caused others to pay the City of Akron for utilities, including trash, water and sewer, for\*\*\*5 Annapolis Avenue under the aliases Chau Fand Lam Hsu and Chaufand Lam Hsu.

F. From in or about 2003 through November 2014, XIN HSU was employed at the Royal Buffet and Grill in Akron, Ohio, as an Assistant Manager.

G. From in or about January 2004 through September 2013, CHAU LAM was employed at the Royal Buffet and Grill in Akron, Ohio, in a managerial position.

H. From in or about January 2005 through January 2013, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU submitted Quarterly Wage Reports to the Ohio Department of Job and Family Services which falsely reported the name and identifiers of Yu H., a legally present alien, as an active employee of the Royal Buffet and Grill, when Yu H. was not so employed, in an effort to conceal the identities of illegal aliens that were employed at the Royal Buffet and Grill.

I. From in or about April 2008 through September 2014, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU, listed only Asian employees on the Quarterly Wage Reports to the Ohio Department of Job and Family Services and failed to list any Hispanic employees despite employing multiple Hispanic employees during those times at the Royal Buffet and Grill.

J. In or about October 2008, CHAU LAM took over ownership of the Royal Buffet and Grill in Akron, Ohio, from Y.L.

K. From in or about January 2009 through November 2014, ZHUO ZOU, an illegally present alien, was employed at the Royal Buffet and Grill in Akron, Ohio, in a managerial position.

L. In or about January 2010, ZHUO ZOU transported six Asian employees from \*\*3 Annapolis Avenue to the Royal Buffet and Grill.

M. In or about February 2010, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU, housed approximately 11 alien employees at \*\*3 Annapolis Avenue, a single

family dwelling, with approximately eight Asian employees living in the main living area of the home and three Hispanic employees living in the basement/garage.

N. From in or about October 2010 through February 2013, CHAU LAM paid and caused others to pay the Dominion Ohio gas bills for the residence at \*\*\*5 Annapolis Avenue with checks drawn on the business account of Royal Buffet.

O. From in or about January 2011 through June 2011, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU falsely reported the names of Fu P., Xiao Z., and Dehang Z., legally present aliens, on the payroll records submitted to the U.S. Department of Labor, as active employees of the Royal Buffet and Grill when those individuals were not so employed, in an effort to conceal the identities of illegal aliens that were employed at the Royal Buffet and Grill.

P. In or about January 2011, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU, housed approximately 14 alien employees at \*\*3 Annapolis Avenue, a single family dwelling with approximately 12 Asian employees living in the main living area of the home and approximately two Hispanic employees living in the basement/garage.

Q. In or about May 2011, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU moved the alien employees from \*\*3 Annapolis Avenue to \*\*\*5 Annapolis Avenue.

R. From in or about April 2012 through November 2014, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU failed to report illegally present alien ZHUO ZOU as an employee at the Royal Buffet and Grill in Akron, Ohio, on the Quarterly Wage Report to the Ohio Department of Job and Family Services.

S. From in or about January 2013 through February 2013, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU employed Ming W., a Chinese citizen with valid work authorizations, at the Royal Buffet and Grill but failed to report Ming W.'s employment on the Quarterly Wage Report to the Ohio Department of Job and Family Services.

T. From in or about January 2013 through February 2013, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU, employed You C., a Chinese citizen with valid work authorizations, at the Royal Buffet and Grill but failed to report You C.'s employment on the Quarterly Wage Report to the Ohio Department of Job and Family Services.

U. In or about January 2013, ZHUO ZOU hired Cooperating Witness 1 ("CW 1"), an illegally present alien, to work at the Royal Buffet and Grill in Akron, Ohio, and did not inquire as to CW 1's status as an illegal alien or require CW 1 to fill out the required I-9 form.

V. In or about January 2013 through November 2014, CHAU LAM, XIN HSU, and ZHUO ZOU paid cash to illegally present aliens for wages earned from employment at the Royal Buffet and Grill in Akron, Ohio.

W. In or about February 2013, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU employed illegally present aliens Ling Z., Tiancai L., Jose G., Juan G., Jesus G., and Anselmo M. at the Royal Buffet and Grill, in Akron, Ohio.

X. In or about April 2013, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU failed to report illegally present aliens Ling Z., Tiancai L., Jose G., Juan G., Jesus G., and Anselmo M. as employees at the Royal Buffet and Grill in Akron, Ohio, on the Quarterly Wage Report to the Ohio Department of Job and Family Services.

Y. In or about April 2013, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU failed to report legally present aliens Ming W. and You C. as employees at the Royal Buffet and Grill in Akron, Ohio, on the Quarterly Wage Report to the Ohio Department of Job and Family Services.

Z. On or about June 10, 2013, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU had A.H., a person known to the Grand Jury, complete a false and fraudulent I-9 citizenship form for Raymond S.

AA. In or about November 2013, ZHUO ZOU hired Cooperating Witness 2 ("CW 2"), an illegally present alien, to work at the Royal Buffet and Grill in Akron, Ohio, and did not inquire as to CW 2's status as an illegal alien or require CW 2 to fill out the required I-9 form.

BB. From in or about November 2013 through November 2014, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU employed CW 2 at the Royal Buffet and Grill in Akron, Ohio, and required CW 2 to work six days a week for 11 hours per day and paid CW 2 \$1,600 per month in cash.

CC. From in or about November 2013 through November 2014, ZHUO ZOU transported CW 2 to and from his employment at the Royal Buffet and Grill and \*\*\*5 Annapolis Avenue, Akron, Ohio.

DD. In or about August 2014, ZHUO ZOU hired Cooperating Witness 3 ("CW 3"), an illegally present alien, to work at the Royal Buffet and Grill in Akron, Ohio, and did not inquire as to CW 3's status as an illegal alien or require CW 3 to fill out the required I-9 form.



EE. From in or about August 2014 through November 2014, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU employed CW 3 at the Royal Buffet and Grill in Akron, Ohio, and required CW 3 to work six days a week for 11 hours per day and paid CW 3 \$1,500 per month in cash.

FF. From in or about August 2014 through November 2014, ZHUO ZOU transported CW 3 to and from his employment at the Royal Buffet and Grill and \*\*\*5 Annapolis Avenue, Akron, Ohio.

GG. On or about October 8, 2014, CHAU LAM sold the house located at \*\*\*5 Annapolis Avenue, Akron, Ohio, to RUI XU.

HH. In or about November 2014, CHAU LAM, RUI XU, XIN HSU, and ZHUO ZOU employed illegally present aliens Enrique U., Ernesto T., and Arturo T. at the Royal Buffet and Grill in Akron, Ohio.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

## COUNT 2

The Grand Jury further charges:

From in or about February 2013, to in or about October 2014, in the Northern District of Ohio, Eastern Division, CHAU FANG LAM, aka CHAU FANG, aka QIU FANG LIN, aka CHAO FONG LAM, aka CHAU FONG HSU LAM, aka CHAU FAND LAM HSU ("CHAU LAM") knowingly and in reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien, to wit: CHAU LAM allowed undocumented and illegally present aliens who were employees of the Royal Buffet and Grill, located on Buchholzer Boulevard, Akron, Ohio, to

reside in the single family home located at \*\*\*5 Annapolis Avenue, Akron, Ohio, knowing that the aliens were undocumented and illegally present and citizens of another country, shielding them from detection and harboring them through improper bookkeeping practices and failing to accurately report their identity to the Ohio Department of Job and Family Services, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

COUNT 3

The Grand Jury further charges:

From in or about October 2014, to in or about November 2014, in the Northern District of Ohio, Eastern Division, RUI XU, aka XU, aka RAY knowingly and in reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien, to wit: RUI XU allowed undocumented and illegally present aliens who were employees of the Royal Buffet and Grill, located on Buchholzer Boulevard, Akron, Ohio, to reside in the single family home located at \*\*\*5 Annapolis Avenue, Akron, Ohio, knowing that the aliens were undocumented and illegally present and citizens of another country, shielding them from detection and harboring them through improper bookkeeping practices and failing to accurately report their identity to the Ohio Department of Job and Family Services, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

COUNT 4

The Grand Jury further charges:

From in or about July 2014, to in or about November 2014, in the Northern District of Ohio, Eastern Division, XIN HSU, aka CINDY (“XIN HSU”), and RUI XU, aka XU, aka RAY (“RUI XU”), knowingly and in reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien, to wit: XIN HSU permitted illegally present aliens to be transported and RUI XU transported illegally present aliens to and from their work at the Royal Buffet and Grill, located on Buchholzer Boulevard, Akron, Ohio, in a 2006 Dodge Caravan, Ohio license plate DUU5428, a vehicle owned and registered to XIN HSU, knowing that the aliens were undocumented and illegally present and citizens of another country, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

FORFEITURE

The Grand Jury further charges:

The allegations of Counts 1 through 4, inclusive are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 8 U.S.C. § 1324(b), 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). As a result of the foregoing offenses, CHAU FANG LAM, aka CHAU FANG, aka QUI FANG LIN, aka CHAU FONG LAM, aka CHAU FONG HSU LAM, aka CHAU FAND LAM HSU; RUI XU, aka XU, aka RAY; XIN HSU, aka CINDY; and ZHUO QIANG ZOU, aka KEN, shall forfeit to the United States any property real or personal, which constitutes or is derived from proceeds traceable to a violation of the charges set forth herein and/or any conveyance that has been or is being used in the commission of a

violation of Title 8, United States Code, Section 1324(a), the gross proceeds of such violation, and any property traceable to such conveyance or proceeds, including, but not limited to the following:

- a. \$85,790.00 in U.S. Currency; and,
- b. \$7,000.00 in U.S. Currency.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.