

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

v.

HAO TONG CHEN  
DOB: 11/04/1991  
SSN: XXX-XX-4811

QIU CHENG CHEN  
DOB: 10/05/1981  
SSN: XXX-XX-5590

CHU XIN ZENG  
DOB: 12/13/1993  
SSN: XXX-XX-2334

YI ZHAO  
DOB: 2/25/1976  
SSN: XXX-XX-3043

FA SEN OU  
DOB: 04/18/1972  
SSN: XXX-XX-3470

WENJING SHI  
DOB: 07/14/1984  
SSN: XXX-XX-1931

FENG FENG LIU  
DOB: 05/07/1985  
SSN: XXX-XX-9565

HUI LI  
DOB: 10/01/1988  
SSN: XXX-XX-0291

DAN LIU  
DOB: 12/16/1982  
SSN: XXX-XX-6861

JING YAN  
DOB: 10/25/1971

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Case No. CF-2025-

CF - 2025 • 5462

KATHRYN R. SAVAGE

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FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

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SSN: XXX-XX-2599 )  
ERIN WILLIAMS-REAM )  
DOB: 10/10/1978 )  
SSN: XXX-XX-1018 )  
WILLIAM RANDALL ROBINSON )  
DOB: 12/30/1976 )  
SSN: XXX-XX-2227 )  
BEVERLY ANN ROBINSON )  
DOB: 02/14/1953 )  
SSN: XXX-XX-5500 )  
MICHELLE ANN ROBINSON )  
DOB: 06/21/1974 )  
SSN: XXX-XX-9703 )  
JOSEPH WADE HYDE )  
DOB: 10/07/1971 )  
SSN: XXX-XX-0140 )  
KENNETH DALE REAM )  
DOB: 8/31/1982 )  
SSN: XXX-XX-7840 )  
MIRI LORENE SNEAD )  
DOB: 06/17/1984 )  
SSN: XXX-XX-5747 )  
KRISTENA LYNN LANDIS )  
DOB: 1/24/1992 )  
SSN: XXX-XX-8948 )  
VERONICA GUZMAN MAGUIRE )  
DOB: 10/08/1972 )  
SSN: XXX-XX-1165 )  
Defendants. )

INDICTMENT

*FOR:*

**COUNT 1: RACKETEERING ~ 22 O.S. § 1403, a FELONY**

**COUNT 2: CONSPIRACY TO DEFRAUD THE STATE ~ 21 O.S. § 424, a FELONY**

**COUNT 3: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 4: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 5: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 6: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 7: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 8: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 9: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 10: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 11: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 12: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

**COUNT 13: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS  
SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

**COUNT 14: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS  
SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

**COUNT 15: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS  
SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

**COUNT 16: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS  
SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

**COUNT 17: UNLAWFUL PROCEEDS ~ 21 O.S. § 2001, a FELONY**

**COUNT 18: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. § 425,  
a FELONY**

*IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:*

By the order of the Supreme Court of Oklahoma, the Twenty-First Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from December 16, 2024, for eighteen (18) months, or until the designated presiding judge determines the Twenty-First Multi-County Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That said Multi-County Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into, and true presentment make, of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath, and in the name and by the authority of the State of Oklahoma, do present and find:

**COUNT 1: RACKETEERING ~ 22 O.S. § 1403, a FELONY**

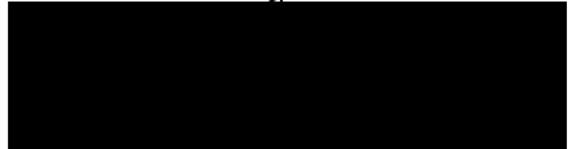
Beginning on or about November 17, 2021, and continuing until on or about October 3, 2025, while acting in concert with one or more of each other and others unknown to the Multi-County Grand Jury, **HAO TONG CHEN, QIU CHENG CHEN, CHU XIN ZENG, YI ZHAO, FA SEN OU, WENJING SHI, FENG FENG LIU, HUI LI, DAN LIU, JING YAN, ERIN WILLIAMS-REAM, WILLIAM RANDALL ROBINSON, BEVERLY ANN ROBINSON, MICHELLE ANN ROBINSON, JOSEPH WADE HYDE, KENNETH DALE REAM, MIRI LORENE SNEAD, KRISTENA LYNN LANDIS, and VERONICA GUZMAN MAGUIRE**, were employed by or associated with an enterprise, referred to herein as the “**HAO CHEN ORGANIZATION**,” and while so employed or associated, did conduct and / or participate in, directly or indirectly, the affairs of that enterprise through a pattern of racketeering activity.

That the Defendants committed said pattern of racketeering activity through their conduct described more fully below, the allegations of which are incorporated herein as if fully printed, that their acts of racketeering activity were related to the affairs of the **HAO CHEN ORGANIZATION**, that this pattern of racketeering included certain felony offenses, to wit: Conspiracy to Defraud the State, in violation of Section 424 of Title 21, violation of the Oklahoma Computer Crimes Act, at Section 1953 of Title 21; Furnishing false or fraudulent material information in an application or document required to be kept or filed under the Uniform Dangerous Substances Act, in violation of Section 2-406(A)(4) of Title 63; Proceeds Derived from Illegal Drug Activity, in violation of Section 2-503.1(B) of Title 63, and Unlawful Proceeds, in violation of Section 2001 of Title 21, and that as a result of these activities, marijuana was unlawfully manufactured, in violation of Section 2-401(G) of Title 63 at marijuana grows, including but not limited to, Golden Farmer LLC in Grady County, Bridge Creek Farms LLC in

Grady County, Rich Cultivation LLC in Blaine County, Healthy Cultivation LLC in Blaine County, FnH Wealth LLC in Payne County, Feugene Farm LLC in Pottawatomie County, Natural Herbal LLC in Kingfisher County, Ream Farm LLC in Canadian County, Portland Farm LLC in Logan County, Snead Farm LLC in Creek County, Produce Green LLC in Pawnee County, Eagle Budz LLC in Logan County, AM Green Leaves LLC in Logan County, and Antarctic Ocean LLC in Garvin County, contrary to the form of the Statutes in such cases made and provided and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN	(X)
TRUE BILL AS TO QIU CHENG CHEN	(X)
TRUE BILL AS TO CHU XIN ZENG	(X)
TRUE BILL AS TO YI ZHAO	(X)
TRUE BILL AS TO FA SEN OU	(X)
TRUE BILL AS TO WENJING SHI	(X)
TRUE BILL AS TO FENG FENG LIU	(X)
TRUE BILL AS TO HUI LI	(X)
TRUE BILL AS TO DAN LIU	(X)
TRUE BILL AS TO JING YAN	(X)
TRUE BILL AS TO ERIN WILLIAMS-REAM	(X)
TRUE BILL AS TO WILLIAM RANDALL ROBINSON	(X)
TRUE BILL AS TO BEVERLY ANN ROBINSON	(X)
TRUE BILL AS TO MICHELLE ANN ROBINSON	(X)
TRUE BILL AS TO JOSEPH WADE HYDE	(X)
TRUE BILL AS TO KENNETH DALE REAM	(X)

TRUE BILL AS TO MIRI LORENE SNEAD (X)  
TRUE BILL AS TO KRISTENA LYNN LANDIS (X)  
TRUE BILL AS TO VERONICA GUZMAN MAGUIRE (X)  
NO BILL ( )



OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 2: CONSPIRACY TO DEFRAUD THE STATE ~ 21 O.S. § 424, a FELONY**

Between on or about September 28, 2021, and on or about October 3, 2025, the crime of **CONSPIRACY TO DEFRAUD THE STATE**, was committed by **HAO TONG CHEN, QIU CHENG CHEN, CHU XIN ZENG, YI ZHAO, FA SEN OU, WENJING SHI, FENG FENG LIU, HUI LI, DAN LIU, JING YAN, ERIN WILLIAMS-REAM, WILLIAM RANDALL ROBINSON, BEVERLY ANN ROBINSON, MICHELLE ANN ROBINSON, JOSEPH WADE HYDE, KENNETH DALE REAM, MIRI LORENE SNEAD, KRISTENA LYNN LANDIS, and VERONICA GUZMAN MAGUIRE** who, acting conjointly together and with others, knowingly and feloniously conspired to defraud the State of Oklahoma through obtaining or renewing medical marijuana commercial grower licenses from the Oklahoma Medical Marijuana Authority and / or obtaining or attempting to obtain medical marijuana manufacturing registrations from the Oklahoma Bureau of Narcotics and Dangerous Drugs Control, and in furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

From 2021 to 2025, **HAO TONG CHEN**, also known as “Bryan” Chen and “Andy” Chen, orchestrated a fraudulent “straw owner” scheme in which he and his associates unlawfully obtained licenses and registrations for marijuana grower facilities, known as “grows,” across the State of Oklahoma, in violation of Oklahoma’s residency requirement and the law requiring that every application for a grower license or registration disclose the true and accurate ownership interest of every marijuana grow.

In this scheme, **HAO TONG CHEN** fraudulently set up marijuana grows by recruiting straw owners and submitting fraudulent Articles of Incorporation to the Oklahoma Secretary of State to form limited liability companies, purporting to have been submitted by those straw owners. These straw owners, who joined the conspiracy, included, but were not limited to, **ERIN WILLIAMS-REAM, WILLIAM RANDALL ROBINSON, William Helbert Robinson, BEVERLY ANN ROBINSON, MICHELLE ANN ROBINSON, JOSEPH WADE HYDE, KENNETH DALE REAM, MIRI LORENE SNEAD, KRISTENA LYNN LANDIS, VERONICA GUZMAN MAGUIRE, Raymond Eugene Ferguson, and Jeremiah Bond.**

After obtaining straw owners, **HAO TONG CHEN**, acting through the **HAO CHEN ORGANIZATION**, submitted fraudulent grower license applications to the Oklahoma

Medical Marijuana Authority and fraudulent registration applications to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control, which falsely represented that these Oklahoma residents were the owners of the marijuana grows. These applications included false assertions, material misrepresentations, deceptive limited liability company operating agreements, forged signatures, falsified affidavits, and other fraudulent documents.

**HAO TONG CHEN**, acting through the HAO CHEN ORGANIZATION, continued to facilitate the illegal manufacture of marijuana by renewing the licenses through the same fraudulent scheme, concealing the fraud from State authorities, creating fraudulent bank accounts to finance the grows, managing and manipulating their online “Seed-to-Sale” or METRC inventory tracking accounts, paying their electric bills, and by facilitating and concealing the unlawful distribution of marijuana from these illegal grows onto the illicit or black-market for that drug.

**HAO TONG CHEN**, acting through the HAO CHEN ORGANIZATION, paid the straw owners, or caused them to be paid, in exchange for using their identity for fraudulent applications and for their continued cooperation to perpetuate fraud against the State of Oklahoma.

**HAO TONG CHEN** was joined and aided in this conspiracy by his associates in the HAO CHEN ORGANIZATION, which included, among others, **QIU CHENG CHEN**, **CHU XIN ZENG**, **YI ZHAO**, **FA SEN OU**, **WENJING SHI**, **FENG FENG LIU**, **HUI LI**, **DAN LIU**, and **JING YAN**.

To conceal this conspiracy from the State of Oklahoma, the above defendants, as part of the HAO CHEN ORGANIZATION, operated through multiple limited liability companies, including those owned and managed by **HAO TONG CHEN** and those managed by his subordinates. These defendants operated these companies out of various office spaces in Oklahoma County.

**ERIN WILLIAMS-REAM** agreed with **HAO TONG CHEN** and **FA SEN OU**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of Golden Farmer LLC, which obtained and renewed a medical marijuana grower’s license from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about November 17, 2021, October 17, 2022, December 6, 2023, and December 12, 2024, and which obtained a registration from the Oklahoma Bureau of Narcotics and Dangerous Drugs Control through a fraudulent application submitted on or about December 6, 2021. **ERIN WILLIAMS-REAM** provided her driver’s license and personal information to **HAO TONG CHEN**, knowing they would be used in fraudulent applications and received monthly payments for serving as the straw owner of Golden Farmer LLC.

Additionally, **ERIN WILLIAMS-REAM** recruited other straw owners for the HAO CHEN ORGANIZATION in exchange for money. The straw owners she recruited or helped recruit included, among others, **WILLIAM RANDALL ROBINSON**, William Helbert Robinson, **BEVERLY ANN ROBINSON**, **MICHELLE ANN ROBINSON**, **KENNETH DALE REAM**, **MIRI LORENE SNEAD**, **KRISTENA LYNN LANDIS**,

**VERONICA GUZMAN MAGUIRE**, Raymond Eugene Ferguson, and Jeremiah Bond.

**FA SEN OU**, on behalf of the HAO CHEN ORGANIZATION, obtained the corporate charter for Golden Farmer LLC, made its reinstatement payments to the Secretary of State, and aided and abetted the submission of fraudulent license and registration applications for Golden Farmer LLC. **FA SEN OU** paid expenses for Golden Farmer LLC, managed that grow, illegally manufactured marijuana there, and made payments to its straw owner **ERIN WILLIAMS-REAM**.

**WILLIAM RANDALL ROBINSON** agreed with **HAO TONG CHEN**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of Healthy Cultivation LLC, which obtained and renewed a medical marijuana grower's license from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about May 11, 2022 and April 28, 2023, and which submitted a fraudulent application for registration to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control on or about May 31, 2022. **WILLIAM RANDALL ROBINSON** provided his driver's license, personal information, and tax records to **HAO TONG CHEN**, knowing they would be used in fraudulent applications, and he received monthly payments for serving as the straw owner of Healthy Cultivation LLC.

Additionally, **WILLIAM RANDALL ROBINSON** opened an account at First Enterprise Bank that was used to pay the electric bills of Healthy Cultivation LLC and helped recruit other straw owners for the HAO CHEN ORGANIZATION, including William Helbert Robinson, **BEVERLY ANN ROBINSON**, **MICHELLE ANN ROBINSON**, **KRISTENA LYNN LANDIS**, **VERONICA GUZMAN MAGUIRE**, and Raymond Eugene Ferguson.

William Helbert Robinson agreed with **HAO TONG CHEN**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of Rich Cultivation LLC, which obtained and renewed a medical marijuana grower's license from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about May 11, 2022 and April 30, 2023, and which submitted a fraudulent application for registration to the Oklahoma Bureau of Narcotics and Dangerous Drugs on or about May 31, 2022. William Helbert Robinson provided his driver's license and personal information to **HAO TONG CHEN**, knowing they would be used in fraudulent applications, and he received monthly payments for serving as the straw owner of Rich Cultivation LLC.

**QIU CHENG CHEN**, also known as "Sam" CHEN, on behalf of the HAO CHEN ORGANIZATION, paid expenses for Healthy Cultivation LLC and Rich Cultivation LLC, managed them, unlawfully manufactured marijuana at these grows, and was a point of contact between the HAO CHEN ORGANIZATION and their straw owners, William Helbert Robinson and **WILLIAM RANDALL ROBINSON**. **QIU CHENG CHEN** made numerous payments to those straw owners.

**BEVERLY ANN ROBINSON** agreed with **HAO TONG CHEN**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of FnH Wealth LLC, which

renewed its medical marijuana grower's license through fraudulent applications submitted to the Oklahoma Medical Marijuana Authority on or about September 29, 2022 and August 30, 2023, and which obtained a registration from the Oklahoma Bureau of Narcotics and Dangerous Drugs Control through a fraudulent application submitted on or about July 29, 2022. **BEVERLY ANN ROBINSON** provided her driver's license and personal information to **HAO TONG CHEN**, knowing they would be used in fraudulent applications, opened an account at Valliance Bank which the HAO CHEN ORGANIZATION used to pay the expenses of FnH Wealth LLC, and received monthly payments for serving as its straw owner.

**FENG FENG LIU**, on behalf of the HAO CHEN ORGANIZATION, aided and abetted the submission, on or about September 29, 2022, of a fraudulent license renewal application of FnH Wealth LLC to the Oklahoma Medical Marijuana Authority and paid the \$2,500 application fee for that submission. **FENG FENG LIU** formed and then managed FnH Wealth LLC, paid its electric bills, served as its registered agent and maintained its corporate charter with the Oklahoma Secretary of State.

**MICHELLE ANN ROBINSON** agreed with **HAO TONG CHEN**, **ERIN WILLIAMS-REAM**, and **WILLIAM RANDALL ROBINSON**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of a marijuana grow, provided her driver's license and personal information to **HAO TONG CHEN** for that purpose, and used her account at BancFirst to make tax payments on behalf of FnH Wealth LLC. Using the driver's license and personal information of **MICHELLE ANN ROBINSON**, the HAO CHEN ORGANIZATION submitted a fraudulent medical marijuana grower license renewal application for Bridge Creek Farms LLC to the Oklahoma Medical Marijuana Authority, on or about November 16, 2023.

Raymond Eugene Ferguson agreed with **HAO TONG CHEN** and **WENJING SHI**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of Feugene Farm LLC, which obtained and renewed a medical marijuana grower license from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about July 29, 2022, September 22, 2023, and February 19, 2025, and which submitted a fraudulent registration application to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control on or about September 22, 2022, and Ferguson provided his driver's license and personal information to **HAO TONG CHEN**, knowing they would be used in fraudulent applications.

**WENJING SHI**, as part of the HAO CHEN ORGANIZATION, paid the \$2,500 application fees to the Oklahoma Medical Marijuana Authority on behalf of Feugene Farm LLC for its fraudulent license renewal applications, on or about September 22, 2023 and January 10, 2025, helped manage Feugene Farm LLC, and served as a point of contact between its straw owner, Raymond Eugene Ferguson, and the HAO CHEN ORGANIZATION.

**JOSEPH WADE HYDE** agreed with **HAO TONG CHEN** and his associates, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of Natural Herbal LLC,

which obtained and renewed a medical marijuana grower license from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about May 13, 2022, April 3, 2023, and May 20, 2024, and which submitted a fraudulent application for registration to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control on or about June 2, 2022, by providing his driver's license and personal information to the HAO CHEN ORGANIZATION, knowing they would be used in fraudulent applications and received payments for serving as the straw owner of Natural Herbal LLC.

**KENNETH DALE REAM** agreed with **HAO TONG CHEN** and **ERIN WILLIAMS-REAM**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of a marijuana grow, and for that purpose, provided **HAO TONG CHEN** with his driver's license and personal information, which were used by the HAO CHEN ORGANIZATION to obtain a grower license for Portland Farm LLC from the Oklahoma Medical Marijuana Authority through a fraudulent application submitted on or about April 4, 2022, to submit a fraudulent application for registration to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control for that company on April 14, 2022, to obtain a grower license from the Oklahoma Medical Marijuana Authority for Ream Farm LLC through a fraudulent application submitted on or about July 6, 2022, to submit a fraudulent application to transfer the ownership of that license on or about July 26, 2023, and to submit a fraudulent application for registration for Ream Farm LLC to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control on August 2, 2022.

**JING YAN**, as part of the HAO CHEN ORGANIZATION, aided and abetted the submission of a fraudulent application for registration to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control for Ream Farm LLC, on or about August 2, 2022, paid the Oklahoma Medical Marijuana Authority a \$500 fee for a fraudulent person of interest change request on or about May 23, 2023, and submitted a fraudulent application to that agency to renew the grower license for Ream Farm LLC, on or about July 26, 2023.

**MIRI LORENE SNEAD** agreed with **HAO TONG CHEN**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of Snead Farm LLC and Produce Green LLC, which obtained medical marijuana grower licenses from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about July 14, 2022 and July 21, 2022, and which submitted fraudulent applications for registration to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control. **MIRI LORENE SNEAD** provided her driver's license and personal information to **HAO TONG CHEN**, knowing they would be used in fraudulent applications and she received monthly payments for serving as the straw owner of those grows.

**KRISTENA LYNN LANDIS** agreed with **HAO TONG CHEN**, on behalf of the HAO CHEN ORGANIZATION, to serve as the straw owner of Eagle Budz LLC, which obtained and renewed a medical marijuana grower license from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about June 8, 2022, May 18, 2023, and April 9, 2025, and which obtained a registration from the Oklahoma Bureau of Narcotics and Dangerous Drugs Control through a fraudulent application submitted on or about July 8, 2022. **KRISTENA LYNN LANDIS** provided her driver's licenses and

personal information to **HAO TONG CHEN**, knowing they would be used in fraudulent applications, and she received monthly payments for serving as the straw owner of Eagle Budz LLC.

**YI ZHAO**, also known as “Joy” ZHAO, as part of the HAO CHEN ORGANIZATION, aided and abetted the submission of a fraudulent medical marijuana grower license renewal application for Eagle Budz LLC to the Oklahoma Medical Marijuana Authority on or about May 18, 2023, served as a point of contact between its straw owner, **KRISTENA LYNN LANDIS** and the HAO CHEN ORGANIZATION, coordinated monthly payments to Landis, paid the \$2,500 fee for the May 18, 2023 license renewal application of Eagle Budz LLC, paid the \$2,500 fee for the license renewal application of Ream Farm LLC, on or about July 26, 2023, and furthered the conspiracy through her company, Joy Luck Services LLC.

**HUI LI**, as part of the HAO CHEN ORGANIZATION, managed Eagle Budz LLC during 2023 and 2024, paid its electric bills, deposited \$20,000 into its fraudulently-created account at Valliance Bank on or about September 28, 2023, and made monthly payments to its straw owner, **KRISTENA LYNN LANDIS**.

**DAN LUI**, as part of the HAO CHEN ORGANIZATION, managed Eagle Budz LLC during 2024 and 2025, paid its electric bills, made monthly payments to its straw owner, **KRISTENA LYNN LANDIS**, and instructed her on how to conceal the fraud from State authorities.

**VERONICA GUZMAN MAGUIRE** agreed with **HAO TONG CHEN**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of Antarctic Ocean LLC, which obtained and renewed a medical marijuana grower license from the Oklahoma Medical Marijuana Authority through fraudulent applications submitted on or about June 9, 2022, July 12, 2023, and July 11, 2024. **VERONICA GUZMAN MAGUIRE** provided her driver’s license and personal information to **HAO TONG CHEN**, knowing they would be used in fraudulent applications and she received monthly payments for serving as the straw owner of Antarctic Ocean LLC.

Jeremiah Bond agreed with **HAO TONG CHEN**, as part of the HAO CHEN ORGANIZATION, to serve as the straw owner of AM Green Leaves LLC, which renewed its medical marijuana grower’s license through a fraudulent application submitted to the Oklahoma Medical Marijuana Authority on or about June 19, 2023, and which submitted a fraudulent application for registration to the Oklahoma Bureau of Narcotics and Dangerous Drugs Control on or about October 10, 2023. Jeremiah Bond provided his driver’s license and personal information to **HAO TONG CHEN**, knowing they would be used for fraudulent applications. **HAO TONG CHEN** made monthly payments to Jeremiah Bond and instructed him on how to conceal the fraud from State authorities.

**CHU XIN ZENG**, also known as “Sherry Tsang,” as part of the HAO CHEN ORGANIZATION, aided and abetted the submission of fraudulent applications to the Oklahoma Medical Marijuana Authority to obtain or renew grower licenses for, among

other companies, Golden Farmer LLC, Healthy Cultivation LLC, Rich Cultivation LLC, FnH Wealth LLC, Bridge Creek Farms LLC, Feugene Farm LLC, Natural Herbal LLC, Portland Farm LLC, Ream Farm LLC, Snead Farm LLC, Produce Green LLC, Eagle Budz LLC, Antarctic Ocean LLC and AM Green Leaves LLC.

**CHU XIN ZENG**, as part of the HAO CHEN ORGANIZATION, managed TCY Consulting LLC to further the conspiracy, paid the \$2,500 application fee to the Oklahoma Medical Marijuana Authority for fraudulent applications to obtain or renew marijuana grower licenses, served as a point of contact between the HAO CHEN ORGANIZATION and the straw owner of FnH Wealth LLC, **BEVERLY ANN ROBINSON**, made and coordinated monthly payments to **BEVERLY ANN ROBINSON**, fraudulently created an account at Prism Bank for FnH Wealth LLC, and helped manage illegal marijuana grows, including among others, FnH Wealth LLC, Natural Herbal LLC and Portland Farm LLC.

TRUE BILL AS TO HAO TONG CHEN	(X)
TRUE BILL AS TO QIU CHENG CHEN	(X)
TRUE BILL AS TO CHU XIN ZENG	(X)
TRUE BILL AS TO YI ZHAO	(X)
TRUE BILL AS TO FA SEN OU	(X)
TRUE BILL AS TO WENJING SHI	(X)
TRUE BILL AS TO FENG FENG LIU	(X)
TRUE BILL AS TO HUI LI	(X)
TRUE BILL AS TO DAN LIU	(X)
TRUE BILL AS TO JING YAN	(X)
TRUE BILL AS TO ERIN WILLIAMS-REAM	(X)
TRUE BILL AS TO WILLIAM RANDALL ROBINSON	(X)
TRUE BILL AS TO BEVERLY ANN ROBINSON	(X)
TRUE BILL AS TO MICHELLE ANN ROBINSON	(X)
TRUE BILL AS TO JOSEPH WADE HYDE	(X)
TRUE BILL AS TO KENNETH DALE REAM	(X)

TRUE BILL AS TO MIRI LORENE SNEAD (X)  
TRUE BILL AS TO KRISTENA LYNN LANDIS (X)  
TRUE BILL AS TO VERONICA GUZMAN MAGUIRE (X)  
NO BILL ( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 3: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about December 6, 2023 and/or December 12, 2024, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN, FA SEN OU, and ERIN WILLIAMS-REAM**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower license for Golden Farmer LLC, containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN (X)

TRUE BILL AS TO FA SEN OU (X)

TRUE BILL AS TO ERIN WILLIAMS-REAM (X)

NO BILL ( )

OKLAHOMA MULTI-COUNTY GRAND JURY

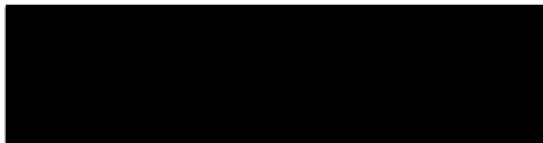
**COUNT 4: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about April 28, 2023, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN** and **WILLIAM RANDALL ROBINSON**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower license for Healthy Cultivation LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN 

TRUE BILL AS TO WILLIAM RANDALL ROBINSON 

NO BILL 



OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 5: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about August 30, 2023, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN, CHU XIN ZENG, and BEVERLY ANN ROBINSON**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting an application to that public office to renew the medical marijuana grower license for FnH Wealth LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN

TRUE BILL AS TO CHU XIN ZENG

TRUE BILL AS TO BEVERLY ANN ROBINSON

NO BILL

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 6: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about November 16, 2023, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN, CHU XIN ZENG, and MICHELLE ANN ROBINSON**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower license for Bridge Creek Farms LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN

TRUE BILL AS TO CHU XIN ZENG

TRUE BILL AS TO MICHELLE ANN ROBINSON

NO BILL

  
OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 7: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about February 19, 2025, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN** and **WENJING SHI**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting an application to that public office to renew the medical marijuana grower license for Feugene Farm LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN

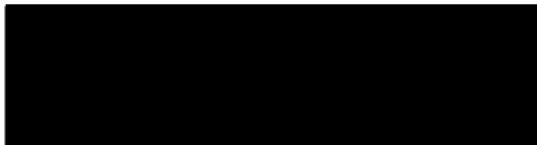
(X)

TRUE BILL AS TO WENJING SHI

(X)

NO BILL

( )



OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 8: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about April 3, 2023 and/or May 20, 2024, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN, CHU XIN ZENG** and **JOSEPH WADE HYDE**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower's license for Natural Herbal LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN (X)

TRUE BILL AS TO CHU XIN ZENG (X)

TRUE BILL AS TO JOSEPH WADE HYDE (X)

NO BILL ( )



OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 9: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

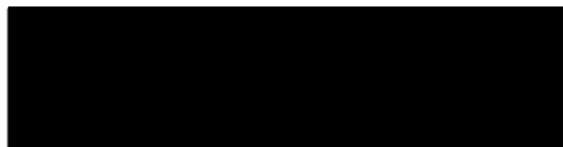
On or about May 18, 2023, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN, YI ZHAO** and **KRISTENA LYNN LANDIS**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower license for Eagle Budz LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN (X)

TRUE BILL AS TO YI ZHAO (X)

TRUE BILL AS TO KRISTENA LYNN LANDIS (X)

NO BILL ( )



OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 10: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about July 12, 2023 and/or July 11, 2024, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN** and **VERONICA GUZMAN MAGUIRE**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower license for Antarctic Ocean LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN (A)

TRUE BILL AS TO VERONICA GUZMAN MAGUIRE (A)

NO BILL [REDACTED] ( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 11: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about June 19, 2023, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN** and **CHU XIN ZENG**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower license for AM Green Leaves LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN

(K)

TRUE BILL AS TO CHU XIN ZENG

(X)

NO BILL

( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 12: OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD ~ 21  
O.S. § 463, a FELONY**

On or about July 26, 2023, the crime of **OFFERING A FALSE OR FORGED INSTRUMENT FOR RECORD** was committed by **HAO TONG CHEN** and **JING YAN**, who knowingly procured or offered a false or forged instrument to be filed, registered, or recorded at the Oklahoma Medical Marijuana Authority, a public office headquartered in Oklahoma County, by submitting to that public office an application to renew the medical marijuana grower license for Ream Farm LLC containing false information, or who otherwise aided, promoted or encouraged the same by act or counsel, contrary to the provisions of Section 463 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN 

TRUE BILL AS TO YING YAN 

NO BILL 

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 13: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

On or about May 21, 2024, at the Rich Cultivation LLC marijuana grow, at or near 249114 E. 820 Road, Watonga, in Blaine County, State of Oklahoma, **HAO TONG CHEN** and **QIU CHENG CHEN** committed the crime of **AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA**, by knowingly manufacturing one thousand (1,000) or more marijuana plants, with marijuana being a Schedule I controlled dangerous substance, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN

(X)

TRUE BILL AS TO QIU CHENG CHEN

(X)

NO BILL

( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 14: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

On or about January 21, 2025, at the AM Green Leaves LLC marijuana grow, at or near 1199 East Way Drive, Guthrie, Logan County, State of Oklahoma, **HAO TONG CHEN** committed the crime of **AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA**, by knowingly manufacturing one thousand (1,000) or more marijuana plants, with marijuana being a Schedule I controlled dangerous substance, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL (K)

NO BILL ( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 15: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

On or about April 8, 2025, at the Feugene Farm LLC marijuana grow, at or near 10796 S. Hwy. 99, Prague, Pottawatomie County, State of Oklahoma, **HAO TONG CHEN** and **WENJING SHI** committed the crime of **AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA**, by knowingly manufacturing one thousand (1,000) or more marijuana plants, with marijuana being a Schedule I controlled dangerous substance, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN

(X)

TRUE BILL AS TO WENJING SHI

(X)

NO BILL

( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 16: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

On or about May 29, 2025, at the Natural Herbal LLC marijuana grow, at or near 6085 E. 780 Road, Kingfisher, in Kingfisher County, State of Oklahoma, **HAO TONG CHEN, CHU XIN ZENG, and JOSEPH WADE HYDE** committed the crime of **AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA**, by knowingly manufacturing one thousand (1,000) or more marijuana plants, with marijuana being a Schedule I controlled dangerous substance, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL AS TO HAO TONG CHEN

(X)

TRUE BILL AS TO CHU XIN ZENG

(X)

TRUE BILL AS TO JOSEPH WADE HYDE

(X)

NO BILL

( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 17: UNLAWFUL PROCEEDS ~ 21 O.S. § 2001, a FELONY**

From between 2021 and 2025, in Oklahoma County and other counties in the State of Oklahoma, **HAO TONG CHEN**, as part of the **HAO CHEN ORGANIZATION**, unlawfully gave and/or transferred a thing of value, to wit: over \$10,000 in United States currency, through electronic payments and cash deliveries, to various straw owners of medical marijuana grows, which **HAO TONG CHEN** knew was intended to be used to commit or further the commission of unlawful activities, to wit: defrauding the state of Oklahoma, in violation of Section 424 of Title 21, and/or furnishing false or fraudulent information to the Oklahoma Bureau of Narcotics in violation of 2-406(A)(4) of Title 63, and/or attempting or endeavoring to obtain a license and registration through the use of a straw person, in violation of Section 2-406(A)(6) of Title 63, and/or offering a false or forged instrument for record, in violation of Section 463 of Title 21, contrary to the provisions of Section 2001 of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ( )

OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 18: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. § 425,  
a FELONY**

On or about between May 21, 2024, and May 29, 2025, the crime of **ENGAGING IN A PATTERN OF CRIMINAL OFFENSES** was committed by **HAO TONG CHEN**, as part of the **HAO CHEN ORGANIZATION**, by unlawfully, willfully and feloniously in two or more counties of the State of Oklahoma, to-wit: Blaine County, and/or Canadian County, and/or Comanche County, and/or Creek County, and/or Garvin County, and/or Grady County, and/or Kingfisher County, and/or Logan County, and/or Oklahoma County, and/or Pawnee County, and/or Payne County, and/or Pottawatomie County, illegally aiding, promoting or encouraging the manufacture of plants from which a controlled dangerous substance is derived, specifically marijuana, each of which was proceeding from an incident or pattern of fraud committed by **HAO TONG CHEN** through the submission of false information and fraudulent license and registration applications to the Oklahoma Medical Marijuana Authority and the Oklahoma Bureau of Narcotics and Dangerous Drugs Control, both of which are in Oklahoma County, and which constituted the same plan, scheme or adventure, contrary to the provisions of Section 425 of Title 21 and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ( )

OKLAHOMA MULTI-COUNTY GRAND JURY

WITNESSES (Before the Grand Jury):

[REDACTED]

CERTIFIED COPY  
AS FILED OF RECORD  
IN DISTRICT COURT

NOV 21 2025

RICK WARREN COURT CLERK  
Oklahoma County  
*Rick Warren*