

**INVASION OF THE HOMELAND: HOW CHINA IS  
USING ILLEGAL MARIJUANA TO BUILD A CRIMI-  
NAL NETWORK ACROSS AMERICA**

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**HEARING**

BEFORE THE

**SUBCOMMITTEE ON  
OVERSIGHT, INVESTIGATIONS,  
AND ACCOUNTABILITY**

OF THE

**COMITTEE ON HOMELAND SECURITY**

**HOUSE OF REPRESENTATIVES**

ONE HUNDRED NINETEENTH CONGRESS

FIRST SESSION

SEPTEMBER 18, 2025

**Serial No. 119-27**

Printed for the use of the Committee on Homeland Security



Available via the World Wide Web: <http://www.govinfo.gov>

U.S. GOVERNMENT PUBLISHING OFFICE

62-705 PDF

WASHINGTON : 2026

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# INVASION OF THE HOMELAND: HOW CHINA IS USING ILLEGAL MARIJUANA TO BUILD A CRIMINAL NETWORK ACROSS AMERICA

Thursday, September 18, 2025

U.S. HOUSE OF REPRESENTATIVES,  
COMMITTEE ON HOMELAND SECURITY,  
SUBCOMMITTEE ON OVERSIGHT, INVESTIGATIONS,  
AND ACCOUNTABILITY,  
*Washington, DC.*

The subcommittees met, pursuant to notice, at 10:14 a.m., in room 310, Cannon House Office Building, Hon. Josh Brecheen (Chairman of the subcommittee) presiding.

Present: Representatives Brecheen, Greene, Strong, Ogles, Knott, Thanedar, Ramirez, Carter, and Green.

Chairman BRECHEEN. All right. Good morning. The Committee on Homeland Security, Oversight, Investigations, Accountability under the broader Homeland Security Committee will come to order. The purpose of today's hearing is to examine how China is using illegal marijuana to build a criminal network across America. Without objection, the Chair is authorized to declare the committee in recess at any point.

I now recognize myself for an opening statement.

Today the Oversight Investigations Accountability Committee is holding this hearing on how the use of illegal marijuana has tied into the criminal network tracing to China is impacting the United States.

First, for order of business, an announcement, the gentleman from Texas, Al Green, will, from this point forward, be serving on the Oversight, Investigations, and Accountability Subcommittee for the remainder of the 119th Congress, and we look forward to working with him.

We are here today to talk about an important issue, significant national security implications. This issue has been prevalent not just in Oklahoma, my home State, but in many other States, Maine, California, and all across our homeland. Let's paint the picture together.

A group of Chinese nationals affiliated with a foreign criminal organization crosses the Southern Border, makes their way into rural Oklahoma. With them are workers who have been lured under the false promise of good jobs in the United States. Once in Oklahoma, these Chinese nationals approach a local resident with an offer they cannot refuse. They offer the resident several hundreds of thousands of dollars purchasing—using their time, their identity to

purchase a nearby tract of land. In return, the resident gets to keep a share of the money with no questions asked. The deal is quick and it is simple.

In a matter of days, this newly-purchased land becomes the site of a large-scale illegal marijuana grow operation. The workers find themselves forced to work 14-hour days under the watch of armed guards, all while being confined to small living quarters, minimal running water, or air conditioning. The smell of toxic fumes, fumigation from pesticides that are lit on fire that we know have caused major health consequences, banned in this country, are utilized for these grow operations. Hundreds of pounds of illegal contaminated marijuana is then produced, ends up in the hands of people all over the United States, from Oklahoma to New York.

This is just one example of how Chinese grow operations come to operation in communities all across the country. Oklahoma has had thousands of these operations activate at one time. Sadly, as we learned today, this is only scratching the surface of what these Chinese-affiliated criminal groups are doing. Many Chinese illegal operations serve as fronts for a wider criminal enterprise, including human and drug trafficking, prostitutions, weapons smuggling, and money laundering.

While the example I highlighted takes place in our home State of Oklahoma, similar patterns are repeated in other States like Maine, Massachusetts, California. In fact, there are thousands of these grow operations dispersed through our entire country, including Tribal lands and national parks.

We have a really excellent panel of expert witnesses before us today who are going to walk us through this issue and how it affects the homeland security posture. Specifically, I would like to focus our conversation on the serious crimes taking place inside of these illegal grow sites, as well as how Chinese transnational criminal organizations, or TCOs, many with ties to the—directly ties to the Chinese Communist Party, are setting up these sites all across the United States as they expand an underground criminal network in our backyard.

We are holding this hearing today because we have enabled these foreign organizations with potential links to the CCP, to build up a sophisticated network throughout the United States, which facilitates a wide range of other criminal activity and presents a national security threat. This is a convergence of organized crime, human and drug trafficking, public health risks, all operating at scale and sophistication, crossing State and national lines beyond the normal capabilities of State and local law enforcement to combat. These agencies need the help of Federal law enforcement to unravel these criminal networks. In fact, some of the foreign nationals running these grow operations are more heavily armed than local law enforcement.

One of my field reps in Oklahoma heard from a journeyman electrician, who was hired to do some work on a rural property. When he arrived at the site, he found what appeared to be a large, foreign-run marijuana grow house and he personally observed an armory of dozens of assault rifles and ammunition crates. This network must be uncovered and eliminated from our homeland, and it is really that simple. The potential threat that comes from hav-

ing a fully operational criminal network associated with top foreign adversary on our soil is too great to ignore. I look forward to an informative and productive discussion.

[The statement of Chairman Brecheen follows:]

STATEMENT OF CHAIRMAN JOSH BRECHEEN

SEPTEMBER 18, 2025

Good afternoon and welcome to the Subcommittee on Oversight, Investigations, and Accountability hearing on how China is using illegal marijuana to build a criminal network across the United States.

First, I would like to welcome the gentleman from Texas, Mr. Al Green, who will serve on the Oversight, Investigations, and Accountability subcommittee for the remainder of the 119th Congress. I look forward to working with you.

We are here today to talk about an important issue with potentially significant national security implications. This issue has been prevalent not just in my State of Oklahoma, but in many other States from Maine to California, all across our homeland.

Let me paint you a picture: A group of Chinese nationals affiliated with a criminal organization cross the Southern Border and make their way to rural Oklahoma. With them are workers who have been lured under false promises of good jobs in the United States.

When in Oklahoma, some Chinese nationals approach a local resident with an offer they can't refuse. The Chinese nationals offer the resident several hundred thousand dollars in cash to purchase a nearby tract of land under the resident's name. In return, the resident gets to keep a share of the money with no questions asked. The deal is quick and simple.

In a matter of days, the newly-purchased land becomes the site of a large-scale, illegal marijuana grow operation.

The workers find themselves forced to work 14-hour days under the watch of armed guards—all while being confined to small living quarters with minimal running water or air conditioning.

The smell of toxic, illegally-smuggled Chinese pesticides used to grow the marijuana fills the air—causing serious health issues.

Hundreds of pounds of illegal—and potentially contaminated—marijuana is produced and eventually ends up in our communities, anywhere from Oklahoma to New York.

This is just one hypothetical example of a Chinese grow operation in my State of Oklahoma—a State that has had up to 12,000 of these operations on-going at one time.

Sadly, as we will learn today, this is only scratching the surface of these Chinese criminal enterprises. Many Chinese-operated illegal grow operations serve as fronts for a wider criminal enterprise, including human and drug trafficking, prostitution, weapons smuggling, and money laundering.

And while the example I highlighted takes place in my home State of Oklahoma, similar patterns are repeated in other States like Maine, Massachusetts, and California. In fact, there are thousands of these grow operations dispersed throughout our entire country—including in our national parks and tribal lands.

We have an excellent panel of expert witnesses before us today who are going to walk us through how this issue affects the homeland. Before we get to their testimony, I want to offer an important point of clarification.

The goal of today's hearing is not to debate the issue of decriminalizing or rescheduling marijuana at the Federal level. Everyone has opinions on that, but I want to focus our conversation on the serious crimes taking place inside of these illegal grow sites, as well as how Chinese transnational criminal organizations, many with ties to the Chinese Communist Party (CCP), are setting up these sites across the homeland as they expand an underground criminal network right here in our backyard.

We are holding this hearing today because we have enabled potential agents of the Chinese Communist Party to build a sophisticated and concerted criminal network, under the guise of these marijuana grow operations, throughout the United States, which enables a wide range of criminal activity and presents unique threats to our national security.

This is a convergence of organized crime, human and drug trafficking, and public health risks, which all operate at a scale and sophistication that crosses State and national lines and is beyond the normal capabilities of State and local law enforce-

ment. These agencies need the help of Federal law enforcement to unravel these criminal networks.

This network must be uncovered and eliminated from our homeland. It's really that simple. The potential threats associated with having a fully operational criminal network from our No. 1 foreign adversary on our soil are too great to ignore.

I look forward to an informative and productive discussion with our witnesses today, and I now turn it over to the Ranking Member for his opening remarks.

Chairman BRECHEEN. I now turn it over to Ranking Member Thanedar for his opening remarks.

Mr. THANEDAR. Good morning and thank you, Chairman. Good morning to all of our witnesses here. I want to welcome my colleague Congressman Al Green from Texas on this committee and look forward to his contribution to our proceedings here.

Now, if you take a stroll through the District of Columbia's neighborhoods, you are likely to encounter the National Guard planting flowers or picking up trash and Federal agents making traffic stops. This supposed crackdown on crime has also played out in Los Angeles, is unfolding in Chicago, soon coming to Memphis, and being threatened by the Vice President that they are on their way or coming to Detroit if needed. Trump's occupation of America's largest city is reducing the Federal Government's ability to pursue serious complex crimes. HSI agents have paused pursuing human traffickers, DEA agents are not uncovering drug rings, and FBI agents stopping investigating financial fraud. Instead, they issue citations for open containers of alcohol, fare evasion, and traffic offenses. The same Federal agents who investigate money laundering and organized crime are also being deployed to Home Depot parking lots to arrest migrants looking for work.

Who is investigating the thousands of illegal marijuana farms that currently exist in this country? I am not talking about someone who is growing a handful of pot plants consistent with their State's law and regulations. I am referring to marijuana that is being grown by organized crime in our Federal forests, business districts, and suburban neighborhoods, perhaps even at the house next door. These illegal grow sites are run by Mexican cartels, Cuban drug traffickers, and, increasingly, Chinese organized crime.

Just a few months ago, in my home State of Michigan, local law enforcement arrested 4 Chinese nationals after discovering over 5,000 marijuana plants worth around \$5 million in a warehouse. The billions of dollars in proceeds from illegal marijuana help finance China's Belt and Road Initiatives, a plan to wrestle global influence away from the United States through foreign investment in developing nations that the Trump administration has cut aid to. The illegal marijuana proceeds also fuel Mexican cartels that traffic deadly fentanyl to the United States.

The marijuana black market is riddled with human trafficking, human smuggling, and forced labor. All too often, migrants are lured to farm with the promise of decent work. Once they arrive, their identification is taken away and they are forced to work 16 hours a day and live in substandard conditions. Illegal marijuana cultivation sites are also stealing our scarce resources, such as water and electricity, while poisoning public lands and banned toxic chemicals and pesticides. Illegal marijuana farms are a threat to our national security, human rights, and the environment.

The Federal Government has had some successes through the Organized Crime Drug Enforcement Task Force. For example, in January 2024, a Federal jury found 2 Chinese nationals guilty of possessing and distributing marijuana. Over a 7-month period, they shipped 56,000 pounds of marijuana from Oklahoma to the East Coast. In June 2024, the Justice Department charged associates of Mexico's Sinaloa drug cartel for conspiring with groups linked to Chinese underground banking to launder drug trafficking proceeds.

Despite these wins and others, the Trump administration has proposed eliminating funding for the OCDETF. I am leery that OCDETF is being replaced with Homeland Security Task Force that will further elevate immigration enforcement at the expense of other law enforcement missions, including those best suited to tackle illegal marijuana. The multifaceted threats posed by illegal marijuana farms run by organized crime require a coordinated national strategy and the resources to carry out that strategy.

I look forward to hearing from today's witnesses about the resources required of the Federal Government to snuff our illegal marijuana.

Thank you all. I yield back, Mr. Chair.  
[The statement of Ranking Member Thanedar follows:]

STATEMENT OF RANKING MEMBER SHRI THANEDAR

SEPTEMBER 18, 2025

If you take a stroll through the District of Columbia's neighborhoods, you're likely to encounter the National Guard planting flowers or picking up trash, and Federal agents making traffic stops. This supposed crackdown on crime has also played out in Los Angeles, is unfolding in Chicago, and soon coming to Memphis.

Trump's occupation of America's largest city is reducing the Federal Government's ability to pursue serious, complex crimes. HSI agents have paused pursuing human traffickers. DEA agents are not uncovering drug rings. And FBI agents stopped investigating financial fraud. Instead, they issue citations for open containers of alcohol, fare evasion, and traffic offenses. These same Federal agents who investigate money laundering and organized crime are also being deployed to Home Depot parking lots to arrest migrants looking for work.

Who is investigating the thousands of illegal marijuana farms that currently exist in this country? And I'm not talking about someone who is growing a handful of pot plants consistent with their State's laws and regulations. I'm referring to marijuana that is being grown by organized crime in our Federal forests, business districts, and suburban neighborhoods—perhaps even at the house next door.

These illegal grow sites are run by Mexican cartels, Cuban drug traffickers, and increasingly, Chinese organized crime. Just a few months ago, in my home State of Michigan, local law enforcement arrested 4 Chinese nationals after discovering over 5,000 marijuana plants, worth around \$5 million, in a warehouse.

The billions of dollars in proceeds from illegal marijuana help finance China's Belt and Road Initiative—a plan to wrestle global influence away from the United States through foreign investment in developing nations that the Trump administration has cut aid to. The illegal marijuana proceeds also fuel Mexican cartels that traffic deadly fentanyl to the United States. The marijuana black market is riddled with human trafficking, human smuggling, and forced labor.

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I look forward to hearing from today's witnesses about the resources required of the Federal Government to snuff out illegal marijuana.

Chairman BRECHEEN. The Ranking Member yields. Thank you. To the other Members of the committee, you are reminded that opening statements may be submitted for the record.

[The statement of Ranking Member Thompson follows:]

STATEMENT OF RANKING MEMBER BENNIE G. THOMPSON

SEPTEMBER 18, 2025

Despite the extreme title of today's hearing, the topic is a serious one. Illegal marijuana farms operated by foreign criminal organizations are a threat to security, human rights, and the environment. Almost no State has been untouched by illegal marijuana farms. From Maine to Oklahoma to Colorado and California, authorities have played a sophisticated game of whack-a-mole with illegal marijuana farms and the criminal organizations who operate them.

Mexican cartels, Cuban gangs, Chinese organized crime, and American locals have established themselves throughout the country to make low-risk, fast money by growing illicit marijuana. But Chinese organized crime quietly became the money launderers for Mexican cartels and other criminal actors, then they invested those proceeds in the illegal marijuana trade. Today, Chinese organized crime is the dominant player in a field of illegal marijuana growers. The threat is not just from the illegally grown and unregulated marijuana that is entering the black market covered in chemicals and virtually untraceable. The international criminal organizations that have taken over the illegal marijuana trade are stealing water from critical sources in drought-ridden States.

They are covering marijuana plants and the ground around them with rodenticide, insecticide, and other poisons that enter water supplies, destroy farmland, and end up in the final product these gangs sell on the black market. They rely on human trafficking and forced labor to grow, cultivate, and tend these illegal marijuana grows. And their ill-gotten gains are reinvested in criminal activities that undermine American security at home and abroad. It is clear that illegal marijuana farms pose a complex threat that requires a coordinated national strategy to combat.

Sadly, at a time when the United States needs a coordinated national strategy to fight back against Chinese criminal organizations, Mexican cartels, and other illicit marijuana growers, the Trump administration is eliminating the Organized Crime Drug Enforcement Task Force (OCADETF). At the same time, the Trump administration is myopically focusing law enforcement resources on deporting people rather than investigating the illegal marijuana grows that are funneling money to international crime and enabling human trafficking.

I look forward to hearing from today's witnesses about the illegal marijuana farms that are fueling international criminal organizations in our communities. I hope my Republican colleagues will take the lessons we learn to heart and work with Democrats to ensure the Federal Government has the resources and capability to combat this crime.

Chairman BRECHEEN. I am pleased to have a panel of witnesses expert in their field before us today to speak to this very important topic. I ask that our witnesses please stand and raise their right hand.

[Witnesses sworn.]

Chairman BRECHEEN. Let the record reflect the witnesses have answered in the affirmative. Thank you and please be seated.

I would now like to formally introduce our witnesses. Mr. Donnie Anderson is director of the Oklahoma Bureau of Narcotics. A native of Oklahoma, he has served in law enforcement for nearly 3 decades. Mr. Paul Larkin is a senior legal research fellow at the Heritage Foundation. He has worked in Federal Government at the Department of Justice and the EPA's Criminal Investigative Division, as well as the private sector as a public policy researcher. Our third witness, Mr. Chris Urben, is a managing director of Nardello & Company, a global investigations consulting firm, and previously served as a special agent senior official at the Drug Enforcement Administration for 24 years. Thank you to all the witnesses for being here today.

I now recognize Director Anderson for 5 minutes for his opening statement. I think that you traveled the longest from Oklahoma, Mr. Anderson, to be here. Thank you for being here.

**STATEMENT OF DONNIE ANDERSON, DIRECTOR, OKLAHOMA BUREAU OF NARCOTICS**

Mr. ANDERSON. Thank you, Mr. Chairman, Ranking Members, and Members of the committee for inviting me to participate in today's hearings and your interest in Chinese-owned marijuana farms. This topic is not of only a public safety interest, but also the interest of America's national security.

My name is Donnie Anderson. I am the director of the Oklahoma Bureau of Narcotics. I've dedicated over 34 years of my life to public safety and drug enforcement in the State of Oklahoma.

I can say without hesitation that the impact of black market marijuana in Oklahoma is unlike anything I've ever encountered in my career. What is even more alarming is the growing influence and involvement of the Chinese Communist Party in this illicit industry. Please understand that what I share today represents only a fraction of the broader threat we face. Several investigations remain open and I am unable to comment on them further without jeopardizing the integrity, endangering the brave men and women at the Bureau who are investigating these cases, or violating the laws to prohibit disclosure of active investigations.

In 2018, Oklahoma voters approved Medical Marijuana State Question 788, drafted by marijuana advocates. Unfortunately, the law imposed no limits on the number of grow operations or the quantity of plants each could cultivate. This lack of regulations led to a staggering oversupply. Between March 2024 to March 2025, licensed grow sites reported 87,210,960 plants in the State of Oklahoma. Yet dispensaries sold just a little over 1.6 million pounds of marijuana in a dispensary. Given that one plant typically yields 1 pound of processed marijuana, over 85 million plants are unaccounted for, representing an estimated \$153 billion in missing product and proceeds. To put this in perspective, as of September 9, 2025, Oklahoma has 324,850 licensed medical marijuana patients.

The scale of unreported inventory is deeply troubling, especially considering the black market producers routinely underreport their plant count. Oklahoma's medical marijuana framework has inadvertently opened the door to international organized crime. Criminal actors exploit the system to produce high-potency marijuana for

black market distribution, fueling what is now estimated to be \$153 billion illicit industry. A particular concern is a high prevalence of Chinese nationals involved in these operations. Their presence has a profound effect on both our State and national security. Consider the following examples.

In 2022, 4 Chinese nationals were executed in an illegal marijuana farm near Hennessey, Oklahoma. A fifth individual was seriously injured. The operation used a fraudulent license obtained via a straw ownership. April 2024, law enforcement arrested multiple suspects in connection with a robbery and homicide at a grove site in Okfuskee County in Oklahoma. The victim, 53-year-old Harry Dam, was fatally shot. July 2025, a Canadian national was found murdered execution-style at a grow operation near Lake Thunderbird, just east of Norman, Oklahoma. The death is believed to be the result of a targeted robbery. The investigation remains ongoing currently.

These incidents are just a few among many. Beyond these murders, State authorities have documented a sharp rise in violent crime linked to black market marijuana operations masquerading as legal enterprises. The Oklahoma Bureau of Narcotics reports associated crimes, including human and sex trafficking, money laundering, illegal gambling, extortion, theft of water and electricity. Our agency currently employs 1 Mandarin-speaking agent. However, this is insufficient when suspects communicate in Cantonese and Fujianese, languages that Mandarin speakers cannot reliably translate.

Compounding this issue is the wide-spread use of WeChat, a Chinese-owned platform used for both communication and financial transactions. Because WeChat is based in mainland China and encrypted, U.S. law enforcement cannot serve legal process or conduct electronic surveillance as we would with domestic platforms. These apps fall outside the scope of the Communication Act of 1996 and Electronic Communications Privacy Act of 1986, making them a major obstacle in our investigations.

Oklahoma law requires marijuana business owners to be State residents with at least 2 years of residency. Yet nearly all Chinese-operated grows circumvent this requirement through fraud and straw ownership. In one instance, a single Oklahoman was listed as the owner of approximately 300 marijuana farms in Oklahoma. This wide-spread fraud is facilitated by consulting firms, real estate agents, and attorneys who help establish these shell operations.

Alarmingly, many of these groves are located near critical infrastructure, including military bases and pipelines. For example, in an on-going investigation, the Department of Defense reported suspicious activity at a marijuana grow operated by an ethnic Chinese group located adjacent to the McAlester Ammunition Plant. This ammunition plant is the largest in the United States that is also responsible for manufacturing the MOAB, Massive Ordnance Air Blast bomb, and houses close to the third of the Department—it maintains a third of the Department of Defense's munitions stockpile. That's where it's at in McAlester, Oklahoma.

This is no doubt the Chinese government has shown interest in Oklahoma's marijuana authority. We have documented financial

transfers to the bank of China and connections to businesses owned by the Chinese government. These concerns have amplified by recent reports of CCP activity in operations, like Salt Typhoon, which my agency was directly affected. Regardless of property ownership, it is my belief that the CCP maintains access to these sites, particularly through its known practices of controlling expatriates via so-called police stations.

Thank you for your time and attention to this critical issue. I'm available to answer any questions you may have or to provide additional information as needed.

[The prepared statement of Mr. Anderson follows:]

PREPARED STATEMENT OF DONNIE ANDERSON

SEPTEMBER 18, 2025

Thank you Mr. Chairman, Ranking Members, and Members of the committee for inviting me to participate in today's hearing and your interest in Chinese-owned marijuana farms. This topic is of not only a public safety interest, but also the interest of America's national security. My name is Donnie Anderson, and I am the director of the Oklahoma Bureau of Narcotics (OBN). I have dedicated over 34 years to public safety and narcotics enforcement, and I can say without hesitation that the impact of black-market marijuana in Oklahoma is unlike anything I have encountered in my career. What is even more alarming is the growing influence and involvement of the Chinese Communist Party (CCP) in this illicit industry.

Please understand that what I share today represents only a fraction of the broader threat we face. Several investigations remain open, and I am unable to comment on them further without jeopardizing their integrity, endangering the brave men and women working these cases, or violating laws that prohibit disclosure of active investigations.

In 2018, Oklahoma voters approved medical marijuana State Question 788 drafted by marijuana advocates. Unfortunately, the law imposed no limits on the number of grow operations or the quantity of plants each could cultivate. This lack of regulation has led to a staggering oversupply.

Between 2024 and 2025, licensed grow sites reported 87,210,960 plants. Yet dispensaries sold only 1,689,601 pounds of marijuana. Given that one plant typically yields 1 pound of processed marijuana, over 85 million plants are unaccounted for—representing an estimated \$153 billion in missing product and proceeds.

To put this in perspective, as of September 9, 2025, Oklahoma has 324,850 licensed medical marijuana patients. The scale of unreported inventory is deeply troubling, especially considering that black-market producers routinely underreport their plant counts.

Oklahoma's medical marijuana framework has inadvertently opened the door to international organized crime. Criminal actors exploit the system to produce high-potency marijuana for black-market distribution, fueling what is now estimated to be a \$153 billion illicit industry.

Of particular concern is the high prevalence of Chinese nationals involved in these operations. Their presence has had a profound effect on both our State and national security. Consider the following examples:

- *2022*.—Four Chinese nationals were executed at an illegal marijuana farm near Hennessey, OK. A fifth individual was seriously injured. The operation used a fraudulent license obtained via a straw owner.
- *April 2024*.—Law enforcement arrested multiple suspects in connection with a robbery and homicide at a grow site in Okfuskee County. The victim, 53-year-old Harry Dam, was fatally shot.
- *July 2025*.—A Canadian national was found murdered execution-style at a grow operation near Lake Thunderbird. The death is believed to be the result of a targeted robbery. The investigation remains ongoing.

These incidents are just a few among many. Beyond these murders, State authorities have documented a sharp rise in violent crime linked to black-market marijuana operations masquerading as legal enterprises. The Oklahoma Bureau of Narcotics (OBN) reports associated crimes including:

- Human and sex trafficking
- Money laundering
- Illegal gambling

- Extortion
- Theft of water and electricity.

Our agency currently employs one Mandarin-speaking agent. However, this is insufficient when suspects communicate in Cantonese or Fujianese—languages that Mandarin speakers cannot reliably translate. Compounding this issue is the widespread use of WeChat, a Chinese-owned platform used for both communication and financial transactions.

Because WeChat is based in mainland China and encrypted, U.S. law enforcement cannot serve legal process or conduct electronic surveillance as we would with domestic platforms. These apps fall outside the scope of the Communications Act of 1996 and the Electronic Communications Privacy Act of 1986, making them a major obstacle in our investigations.

Oklahoma law requires marijuana business owners to be State residents with at least 2 years of residency. Yet nearly all Chinese-operated grows circumvent this requirement through fraud and straw ownership. In one instance, a single Oklahoman was listed as the owner of approximately 300 farms.

This wide-spread fraud is facilitated by consulting firms, real estate agents, and attorneys who help establish these shell operations. Alarming, many of these grows are located near critical infrastructure, including military bases and pipelines.

For example, in an on-going investigation, the Department of Defense has reported suspicious activity at a marijuana grow operated by an ethnic Chinese group located adjacent to the McAlester ammunition plant. This ammunition plant is the largest in the United States that is also responsible for manufacturing the MOAB (Massive Ordnance Air Blast) bomb, and houses close to one-third of the Department of Defense's munitions stockpile.

There is no doubt that the Chinese government has shown interest in Oklahoma's marijuana industry. We have documented financial transfers to the Bank of China and connections to businesses owned by the Chinese government.

These concerns are amplified by recent reports of CCP activity in operations like Salt Typhoon. Regardless of property ownership, it is my belief that the CCP maintains access to these sites, particularly through its known practice of controlling expatriates via so-called "police stations."

Thank you for your time and attention to this critical issue. I am available to answer any questions you may have or to provide additional information as needed.

Chairman BRECHEEN. Thank you, Mr. Anderson.

I now recognize Director Larkin for 5 minutes for his opening statement.

**STATEMENT OF PAUL J. LARKIN, JOHN, BARBARA, AND VICTORIA RUMPEL SENIOR LEGAL RESEARCH FELLOW, EDWIN MEESE III CENTER FOR LEGAL AND JUDICIAL STUDIES, THE HERITAGE FOUNDATION**

Mr. LARKIN. For 60 years, one of the primary arguments made in favor of the legalization of cannabis is that it will eliminate the black market. The rationale given was that people would prefer to avoid criminal prosecution for using cannabis and they would like to purchase it from a store with a quality reputation and a quality product. Over the last 5 to 10 years. We now know that that argument is a fugazi. The black market has not disappeared even though a majority of States in the United States now have approved either medical or recreational use marijuana programs. In fact, the problem that you have taken up is a matter not just of public health, which is the way cannabis issues are normally thought of. It's a matter of domestic or homeland and national security.

Why? The businesses that we see across the Nation selling cannabis for medical or recreational purposes are not run by 1950's-era beatniks or 1960's-era hippies. They are run by Chinese organized crime with a tacit knowledge and acquiescence by the People's Republic of China and the Chinese Communist Party, two en-

tities that are sworn enemies of the United States. That raises a clear homeland and national security aspect of this problem that has been under-discussed in all the debates over cannabis legalization.

This is a serious problem. According to the Whitney Economics Organization, the cannabis market is a \$100 billion industry, 75 percent of it is the illegal market and two-thirds of the cannabis sold in the United States is grown domestically. So we're talking not just about somebody who is growing 5 plants in a home in connection and as authorized by a State law. We're talking about people growing massive quantities who are part of an organization that has nothing but the worst interests of people in our neighborhoods in mind.

I mean, the existence of this black market is recognized by numerous parties. Senator Joni Ernst and 49 other Members of Congress sent a letter to then-Attorney General Merrick Garland asking him to look into this. There have been numerous other organizations and think tanks that have written about it. There are beaucoup media stories, written, print, or in the TV media on this. They all agree that this is a serious problem because it is not simply the illegal distribution of controlled substances that is at issue. It is all of the associated crimes that occur. As the Ranking Member pointed out, we will see money laundering, human trafficking, prostitution, fraud, and various types of violent crimes, including homicides, as my colleague has pointed out. All of these damage our local communities.

But it's not just that. The money that Chinese organized crime made from illegal fentanyl sales has helped underwrite their cannabis business in the United States. The money that they make in the current operations can be used to spread those operations into other States and other areas as well as for other purposes that do not have the best interests of the United States in mind. Now, if this were just simply a small-scale matter rather than a coast-to-coast matter, it might not merit the attention of anything other than the legislatures, the Executive branch, and law enforcement in those States and neighborhoods. But it is, in fact, from coast to coast, from Maine to California. Oklahoma, which is probably halfway between, has seen a very serious problem as for the reasons my colleague gave because there is unlimited grows allowed in that State.

Now, as I mentioned before, this is not simply a problem of domestic people that have broke bad. The Chinese organized crime elements are working with the tacit knowledge and acquiescence of the PRC and CCP. Now, that does—the law does not require a formal agreement amongst those parties in order for them to be held criminally liable. As I have explained in some of my writings, the conspiracy laws allow someone to put together a case based on various types of circumstantial evidence of which there is an ample amount here.

What we have is a national problem involving a drug that, unfortunately, is seen as being milder in some ways than others and, pharmacologically, in many respects it is. But cannabis is very harmful if you use it on a long-term basis or in very serious doses.

I am glad that you're holding this hearing and I'm glad to answer your questions.

[The prepared statement of Mr. Larkin follows:]

PREPARED STATEMENT OF PAUL J. LARKIN

SEPTEMBER 18, 2025

Thank you for the opportunity to submit a written statement and testify at this hearing.<sup>1</sup> As the Rumpel Senior Legal Fellow at The Heritage Foundation, much of my recent scholarship has focused on drug policy and the involvement of foreign countries, including China, in the illicit drug trade.<sup>2</sup> I will draw from them here.

#### INTRODUCTION

Most debates over the rescheduling, decriminalization, or legalization of cannabis, known in the lingo as “marijuana,” focus on the public health question of whether it is a relatively harmless intoxicant or a medically hazardous drug.<sup>3</sup> This hearing, by contrast addresses a homeland security aspect of the controversy over cannabis: namely, the problem of control by Chinese organized crime elements (or Triads) of the unlawful medical and recreational cannabis markets in the United States.<sup>4</sup>

It would be troublesome if any foreign nation gained a dominant position in any criminal market in the United States. But the subject of this hearing concerns a far, far more severe problem. The People's Republic of China (PRC) and the Chinese Communist Party (CCP) are committed enemies of the United States.<sup>5</sup> They seek to displace the United States as the world's dominant military and economic power by no later than 2049, the centennial anniversary of the founding of the PRC. For that reason, it is a matter of paramount and urgent concern for the Nation's secu-

<sup>1</sup>The Heritage Foundation is a public policy, research, and educational organization recognized as exempt under section 501(c)(3) of the Internal Revenue Code. It is privately supported and receives no funds from any government at any level, nor does it perform any government or other contract work. The Heritage Foundation is the most broadly supported think tank in the United States. During 2024, it had hundreds of thousands of individual, foundation, and corporate supporters representing every State in the U.S. Its 2024 operating income came from the following sources: Individuals 81 percent; Foundations 14 percent; Corporations 2 percent; Program revenue and other income 3 percent. The top five corporate givers provided The Heritage Foundation with 1 percent of its 2024 income. The Heritage Foundation's books are audited annually by the national accounting firm of RSM US, LLP. Members of The Heritage Foundation staff testify as individuals discussing their own independent research. The views expressed are their own and do not reflect an institutional position of The Heritage Foundation or its board of trustees.

<sup>2</sup>For the subcommittee's convenience, I have attached as appendices two relevant Heritage Foundation publications of mine: (1) Paul J. Larkin, *China and Cannabis*, HERITAGE FOUND., Legal Memorandum No. 380 (2025) [hereafter Larkin, *China and Cannabis*], and (2) Paul J. Larkin, *Twenty-First Century Illicit Drugs and Their Discontents: The Failure of Cannabis Legalization to Eliminate an Illicit Market*, HERITAGE FOUND. Legal Memorandum No. 326 (2023).

<sup>3</sup>I have written on that subject. See, e.g., Bertha K. Madras & Paul J. Larkin, *Rescheduling Cannabis—Medicine or Politics?*, 82 JAMA PSYCHIATRY 934 (2025); Paul J. Larkin, *Driving While Stoned in Virginia*, 59 AM. CRIM. L. REV. ONLINE 1 (2022); Paul J. Larkin, *Reconsidering Federal Marijuana Regulation*, 18 OHIO ST. J. CRIM. L. 99 (2020).

<sup>4</sup>Unless the context dictates otherwise, references to “China,” “Chinese,” the “People's Republic of China (PRC),” or the “Chinese Communist Party (CCP)” should be read as referring to Chinese organized crime elements. That is an important subject worth serious consideration.

<sup>5</sup>“The Chinese government has made no secret of its ambition to surpass the West both militarily and economically by the regime's 100th anniversary in 2049 in the hope that the 21st Century will be dominated by China in the same way that the 20th Century was dominated by the United States. According to a popular saying in Chinese mythology, ‘there is only one sun in the sky.’ . . . What is worrisome is how China achieves and maintains that wealth and power within the increasingly interdependent global environment and its effects on the security and well-being of the Western democracies.” JOHN A. CASSARA, *MONEY LAUNDERING AND ILLICIT FINANCIAL FLOWS: FOLLOWING THE MONEY AND VALUE TRAILS* 193 (2020) (footnote omitted); see also, e.g., Tom Porter, *China Waging New Cold War to Topple U.S. as World's Leading Superpower, Says CIA Official*, NEWSWEEK, July 22, 2018; <https://www.newsweek.com/china-waging-new-cold-war-topple-us-worlds-leading-superpower-says-cia-1036226> (“Michael Collins, the deputy assistant director of the CIA's East Asia Mission Center stated in 2018 that Beijing's tactics to achieve its ambitions fit the definition of a cold war: ‘I would argue by definition what they're waging against us is fundamentally a cold war . . . A country that exploits all avenues of power licit and illicit, public and private, economic and military, to undermine the standing of your rival relative to your own standing without resorting to conflict.’”); Larkin, *China and Cannabis*, supra note 2, at 10 n.2 (collecting authorities).

urity that Chinese organized crime elements have infiltrated the American States that have legalized cannabis for medical or recreational purposes.

#### I. CHINESE ORGANIZED CRIME’S INVOLVEMENT IN THE U.S. DOMESTIC CANNABIS INDUSTRY

According to the U.S. Drug Enforcement Administration (DEA), “Chinese and other Asian [Transnational Criminal Organizations, or TCOs] have taken control of the marijuana trade” in the United States.<sup>6</sup> Over 10 years, “Chinese TCOs have come to dominate the cultivation and distribution of marijuana across the United States,” a development seen from California to Oklahoma to Maine.<sup>7</sup> Most of the Chinese TCOs’ cannabis cultivation occurs in States that have legalized cannabis production under State law, although the TCOs often relocate to other States once

<sup>6</sup>DRUG ENFT ADMIN, U.S. DEPT OF JUST., *2025 National Drug Threat Assessment*, DEA-DCT-DIR-007-25, at 51 (May 2025) [hereafter *2025 DEA Threat Assessment*].

<sup>7</sup>2025 DEA Threat Assessment, *supra* note 6, at 49; *id.*: The purchase of real estate for both indoor and outdoor grows, and for the storage of needed equipment, is often initially funded through family and community connections, both in China and in the United States, as many seek to skirt restrictions on the movement of currency from Chinese banks to foreign countries. Undocumented Chinese immigrants, many of whom spent years in Mexico and were lured to the United States with offers of legal employment, staff many of the grow sites alongside undocumented Mexican immigrants in similar circumstances. The undocumented migrants are closely monitored by the Chinese TCO members who own and manage the grows. Most of the grow sites are located in States where the cannabis industry is “legal,” though most do not follow the established licensure process or have obtained their licenses through falsified means. They face little prison time, if any, when caught, and often move to a new location in the same State or to another “legal” State once discovered. The Chinese TCOs are producing the most potent form of marijuana in the history of drug trafficking, with a THC content averaging 25 to 30 percent, compared to a national average of 16 percent. The grow sites use pesticides and fertilizers shipped from China, including many chemicals banned in the United States for decades because of adverse health and environmental consequences. Not only are these chemicals entering the water, soil, and air around the grow sites, some quantity of these chemicals also remains on the processed marijuana that is ingested by users.

Oklahoma seems to have been targeted because there is no effective limit on the amount of cannabis that can be grown. See NATL STRATEGIC ANALYSIS INITIATIVE, HIGH INTENSITY DRUG TRAFFICKING AREAS, *Briefing Report—Chinese Nationals and Marijuana in the United States 2-3* (2025) [hereafter *HIDTA Report on China and Cannabis*] (“Oklahoma became a hotspot for Chinese marijuana operations after voters said ‘yes’ to medicinal marijuana in 2018. The State stood out because it did not limit the number of dispensaries or growing operations . . . In Oklahoma, the lack of regulations to limit the number of dispensaries or grow operations created opportunistic conditions for illegal activities. State investigators found connections between foreign criminal networks and over 3,000 illegal grows—more than 80 percent of these were Chinese-run. The Oklahoma Bureau of Narcotics (OBN) shut down more than 800 farms in 2 years. About 75 percent of these had links to Chinese investors and organized crime.”) (footnotes omitted); Terry Gross, *How the Chinese Mafia Came to Control Much of the Illicit Marijuana Trade in the U.S.*, NPR, Mar. 21, 2024, <https://www.npr.org/2024/03/21/1239854106/how-the-chinese-mafia-came-to-control-much-of-the-illicit-marijuana-trade-in-the> (last accessed Aug. 1, 2025) (“You have remarkable scenes of private planes flying from rural airstrips in California to Oklahoma with couriers carrying suitcases full of cash to go out and buy farms in Oklahoma, where land is cheap, and setting up new operations in the new hotspot where they can make even more money because there’s really no limits on how big these farms are and how much marijuana they can grow . . . GROSS: . . . [W]hy Oklahoma? You mentioned that land is cheap there. Is that the main reason why Oklahoma has become such a big State for the illicit growth of marijuana? [¶] ROTELLA: It’s partly because the land is cheap. It’s also because that medical marijuana law they passed made it particularly easy just to move in, set up and grow. In other States, there are limits on how much you can grow. In Oklahoma, there are basically no limits. So you have these huge operations and thousands of farms growing marijuana and, you know, law enforcement kind of overwhelmed and trying to keep up with it and prevent what is kind of wholesale trafficking to other States.”); *id.* (“ROTELLA: What has happened is there have just been a great deal of—an overwhelming number of farms—at one point, there were 10,000 growing operations in Oklahoma—and systematic abuse and violation of those laws, particularly criminal groups paying, illegally, Oklahoma residents to be straw owners and farms that are producing far more marijuana than could be consumed in Oklahoma for medical purposes. And most of that marijuana is going around the country, particularly the East Coast, to be sold illegally. [¶] GROSS: So organized crime gets people to front for them and get a license, and then organized crime can move in and grow. And it looks legal. [¶] ROTELLA: And it has the facade of legality. And what’s happening is then taking advantage of the fact that you can get a lot more money, say, if you’re selling the dope in New York or on the East Coast. There’s smuggling of, you know, truck-loads of marijuana and huge profits—you know, billions of dollars being made in this marijuana that’s grown in Oklahoma and being trafficked and sold elsewhere.”).

they are discovered.<sup>8</sup> According to a recent report by the Federal High Intensity Drug Trafficking Areas entitled *Chinese Nationals and Marijuana in the United States*, “[a]n unprecedented expansion of Chinese-operated marijuana farms has been tracked across the United States, with operations from California to Maine,” meaning that “Chinese marijuana operations now dominate the U.S. illegal drug market at levels never seen before.”<sup>9</sup> Various other parties—including Federal, State, and local law enforcement officers, Members of Congress, and investigative journalists—have reached the same conclusion.<sup>10</sup>

<sup>8</sup>See Gross, *supra* note 7 (“When States started legalizing marijuana, one of the hopes was that it would cut down on crime because people could buy it legally from licensed sellers. But in some States, including Oklahoma, legalization inadvertently helped organized crime, especially the Chinese mafia, exploit new opportunities. Chinese organized crime has come to dominate much of the illicit marijuana trade in the Nation, from California to Maine[.]”).

<sup>9</sup>*HIDTA Report on China and Cannabis*, *supra* note 7, at 2; see also *id.* at 1 (“Oklahoma’s illegal marijuana production alone ranges between \$18 billion and \$44 billion each year . . . Chinese marijuana operations have spread across America in a clear pattern. They started in California over a decade ago and have now expanded to States that have favorable growing conditions with less oversight. Oklahoma became a hotspot for Chinese marijuana operations after voters said ‘yes’ to medicinal marijuana in 2018. The State stood out because it did not limit the number of dispensaries or growing operations.”); *id.* (“Oklahoma saw its licensed marijuana grows reach almost 10,000 by late 2021, which provided perfect cover for illegal operations.”) (footnote omitted); *id.* at 2 (“State investigators found connections between foreign criminal networks and over 3,000 illegal grows—more than 80 percent of these were Chinese-run. The Oklahoma Bureau of Narcotics (OBN) shut down more than 800 farms in 2 years. About 75 percent of these had links to Chinese investors and organized crime.”) (footnotes omitted).

<sup>10</sup>See, e.g., U.S. DEPT OF JUST., *Press Release, Seven Chinese Nationals Charged for Alleged Roles in Multi-Million-Dollar Money Laundering, Alien Smuggling and Drug Trafficking Enterprise*, July 8, 2025 [hereafter DOJ, *Seven Chinese Nationals Charged*], <https://www.justice.gov/usao-ma/pr/seven-chinese-nationals-charged-alleged-roles-multi-million-dollar-money-laundering> (“Seven Chinese nationals were charged today in connection with a multi-million-dollar conspiracy to cultivate and distribute marijuana across the Northeast that used interconnected grow houses concealed inside single-family properties in Massachusetts and Maine. It is alleged that Chinese nationals were smuggled into the United States to work in these grow houses without access to their passports until they repaid their smuggling debts . . . Data extracted from Chen’s [Jianxiong Chen, the accused ringleader of this organization] cell phone allegedly revealed that he helped smuggle Chinese nationals into the United States—putting the aliens to work at one of the grow houses he controlled while keeping possession of their passports until they repaid him for the cost associated with smuggling them into the country.”); *Letter from U.S. Senator Jodi Ernst and 49 Other Members of Congress to U.S. Attorney Gen’l Merrick Garland Regarding Chinese Nationals and Organized Crime Cultivation of Cannabis in the United States 1* (Feb. 2, 2024) [hereafter *Ernst Letter*], [https://www.ernst.senate.gov/imo/media/doc/ernst\\_works\\_to\\_shut\\_down\\_cop-linked\\_marijuana\\_farms.pdf](https://www.ernst.senate.gov/imo/media/doc/ernst_works_to_shut_down_cop-linked_marijuana_farms.pdf) (last accessed Sept. 10, 2025) (“We are deeply concerned with reports from across the country regarding Chinese nationals and organized crime cultivating marijuana on United States farmland. In some cases, the grow operators were also engaged in human trafficking, forced labor, drug trafficking, and violent crime. These farms are most commonly in States with legal marijuana programs where illicit growers try to disguise their operations in communities where law-abiding Americans live and work. The thousands of illicit Chinese marijuana growing operations pose a direct threat to public safety, human rights, national security, and the addiction crisis gripping our Nation.”) (footnotes omitted); Emily Feng, *Marijuana Farms Are Increasingly Chinese-Run. Why?*, NPR, Mar. 13, 2024, <https://www.npr.org/2024/03/23/1240510436/marijuana-farms-are-increasingly-chinese-run-why> (last accessed Aug. 1, 2025) (“37,000 Chinese people . . . crossed into the country this way last year alone [i.e., 2023]. U.S. border authorities say this number is more than the past 10 years combined.”); Natalie Fertig, *The Growing Chinese Investment in Illegal American Weed*, POLITICO, Mar. 21, 2023, [www.politico.com/news/2023/03/21/illicit-cannabis-china-00086125](http://www.politico.com/news/2023/03/21/illicit-cannabis-china-00086125) (last accessed Sept. 8, 2025) (“In California, the Department of Cannabis Control says Chinese triads have been nominally involved in illegal cannabis production for decades, but that there’s been a recent increase in the number of actors and money that may have originated in China. The DCC also said that some—but not all—of the Chinese-funded grows they’ve encountered are operated by Chinese triads. ‘This notion that you now have Chinese actual funding for illicit cannabis, it’s definitely new, and it cuts directly across the interests of Mexican drug trafficking groups,’ said [Vanda] Felbab Brown. ‘It’s interesting to see whether it continues growing, [and] how that’s going to affect relations between the Mexicans and the Chinese [criminal groups].’”); *id.* (“A few days before Christmas, a joint law enforcement task force found nearly 9,000 pounds of cannabis worth almost \$15 million during a raid in a suburban neighborhood in Antioch, Calif. . . . The California Department of Cannabis Control believes that the 4 houses searched in the bedroom community 45 minutes outside San Francisco were linked to China.”); *id.* (“Law enforcement in southern Oregon in 2021 reported as many as 20 different nationalities linked to illegal grows. But the increasing amount of Chinese funding—and what lawmakers and some experts say is the potential influence of the Chinese Communist Party—has caught the attention of legislators and law enforcement alike.”); Liyan Qi, *How Chinese Marijuana Operations Cropped Up in Small-Town America*, WALL ST. J., Nov. 30, 2023, [https://www.wsj.com/us-news/law/how-chinese-marijuana-operations-cropped-up-in-small-town-america-45b7b598?mod=Searchresults\\_pos2&page=1](https://www.wsj.com/us-news/law/how-chinese-marijuana-operations-cropped-up-in-small-town-america-45b7b598?mod=Searchresults_pos2&page=1) (last accessed Aug. 1, 2025) (“Following the legalization of

Chinese organized crime has been able to move into the American cannabis industry because—contrary to what cannabis reform advocates have told us for the last 60-plus years—the legalization of cannabis has not eliminated a black (or grey) market for that plant.<sup>11</sup> Since the 1960’s, cannabis reform proponents have argued that a black market will always exist to meet the consumer demand for illegal cannabis, so the best way to eliminate that market is to legalize and regulate its cultivation, distribution, and sale. The availability of legally sold cannabis, we were told, would eliminate the black market for two reasons. The average person wants both to avoid arrest, prosecution, and imprisonment for purchasing cannabis and also prefers doing so from an above-board store with a reputation for selling a safe, reliable, and uniform product instead of buying a potentially dangerous substance with an unknown effect. Accordingly, the argument concluded, the illicit cannabis market would disappear through the ordinary work of basic economics and consumer choice in a legitimate market.

That is not what happened. As I explained in my article *China and Cannabis*:

“History has proved the reformers wrong; illicit markets are still with us today, nearly 30 years after California rolled the first cannabis snowball downhill. According to estimates made by Whitney Economics, which analyzes the cannabis industry, the illegal markets constitute approximately 75 percent of the \$100 billion industry, and two-thirds of the cannabis sold in these markets is grown domestically. Even the Supreme Court of the United States has acknowledged that ‘there is an established, albeit illegal, interstate market’ for cannabis in the United States. Parties who grow and sell cannabis without a license have continued to prosper in States where it may be lawfully distributed under State law. The illicit industry in some States—California, where the contemporary cannabis revolution began, is a prime example—is larger than the lawful one that was supposed to drive the former out of business.

“The reason for the black market’s survival is Economics 101 ‘with a dose of convenience thrown in.’ Unlicensed growers do not pay the taxes that licensed businesses pay, nor do they comply with the environmental and labor regulations that increase the operating costs for regulated firms. The result is that they can sell cannabis at a lower price than State-licensed stores can charge. Additionally, some people will fear being ‘outed’ as users because it could cost them their jobs or damage their reputation, so they will continue to purchase cannabis on the sly. Cannabis grown for medical or personal uses, which are not subject to any business taxes and regulations, can be sold locally in competition with retail stores. Finally, cannabis has been grown illegally in Federal and State parks, which adds to the amount available for sale to the public. Illicit sales have become a fixture of the cannabis market, and there is no evidence that cannabis’s thriving black market will disappear, whether soon or ever.”<sup>12</sup>

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marijuana in many States, Chinese-run marijuana farms have emerged across the U.S. Some are run by investor groups with a commercial growing license. But just as illegal marijuana shops have proliferated, so have unlicensed growing operations.”); id. (“In California, Chinese networks have seized on the highly lucrative black market in marijuana growing, said Lt. Raymond Framstad of the Merced County Sheriff’s Office, who has investigated more than 20 cases involving unlicensed Chinese-run operations.”); Gross, *supra* note 7 (“Marijuana has been legalized in some States, but ProPublica’s Sebastian Rotella says there’s still a thriving illicit market, dominated by criminals connected to China’s authoritarian government.”); id. (“In California, Chinese networks have seized on the highly lucrative black market in marijuana growing, said Lt. Raymond Framstad of the Merced County Sheriff’s Office, who has investigated more than 20 cases involving unlicensed Chinese-run operations.”); id. (“Many Chinese networks have enough equipment for several large residential operations . . . They find the house that they want, equip it to grow marijuana a year or longer before the police crackdown, then fix the property up and sell it at a profit . . . A residential black-market growing operation can be set up for as many as six harvests a year, bringing in an annual profit of several million dollars depending on the size, said [Lieutenant] Framstad, who oversees the marijuana enforcement team at the sheriff’s office.”); Sebastian Rotella et al., *A Diplomat’s Visits to Oklahoma Highlight Contacts Between Chinese Officials and Community Leaders Accused of Crimes*, PROPUBLICA, Mar. 22, 2024, [www.propublica.org/article/oklahoma-marijuana-china-diplomat-visits](http://www.propublica.org/article/oklahoma-marijuana-china-diplomat-visits) (last accessed Sept. 120,[sic] 2025) (“‘These diaspora associations are tools of the Chinese state,’ said Donald Im, a former senior official at the Drug Enforcement Administration. ‘The presence of criminal elements in the leadership suggests an alliance, directly or indirectly, between the Chinese state and organized crime.’”).

<sup>11</sup> In a “black market,” any sale of cannabis is illegal. A “grey market” is one where cannabis may be sold but is regulated and taxed, and sales occur outside the regulatory and tax regime.

<sup>12</sup> Larkin, *China and Cannabis*, *supra* note 2, at 3 (footnotes omitted).

II. THE POTENTIAL SYMBIOTIC RELATIONSHIP BETWEEN CHINESE ORGANIZED CRIME AND THE GOVERNMENT OF THE PEOPLE’S REPUBLIC OF CHINA AND THE CHINESE COMMUNIST PARTY

There is reason to believe that Chinese Organized Crime is acting with the knowledge of, and tacit acceptance by, the government of the People’s Republic of China (PRC) and the Chinese Communist Party (CCP). U.S. Senator Joni Ernst and 49 other Members of Congress made that point in a February 2, 2024, letter to then-U.S. Attorney General Merrick Garland.<sup>13</sup> According to a 2024 report by ProPublica, “U.S. and foreign national security officials have alleged that the Chinese state maintains a tacit alliance with Chinese organized crime in the U.S. and across the world.”<sup>14</sup> Brookings Institution drug policy expert Vanda Felbab-Brown concluded that “[t]he Chinese government has a complicated relationship with organized crime.”<sup>15</sup> The PRC ostensibly condemns the Triads, but seems to acquiesce in their global fentanyl and methamphetamine drug trafficking networks. In addition, Chinese mobsters “overtly support pro-Beijing causes and covertly provide services overseas,” ProPublica noted, “engaging in political influence work, moving illicit funds offshore for the Chinese elite and helping persecute dissidents, according to Western officials, court cases and human rights groups,” and even provide “extra-legal” muscle for the PRC “to curry favor with the CCP.”<sup>16</sup> Finally, there is evidence that a Chinese diplomat met with members of a suspected Chinese criminal network in Oklahoma.<sup>17</sup>

It is important to realize that the PRC and CCP cannot escape responsibility for the actions of Chinese organized crime by arguing that there is no express agreement between the former two entities and the latter. In a criminal prosecution, the jury may “rely on inferences drawn from the course of conduct of the alleged conspirators.”<sup>18</sup> As the Supreme Court of the United States has made clear, “[t]he doctrine of willful blindness is well established in criminal law.”<sup>19</sup> as is the principle

<sup>13</sup>Ernst Letter, supra note 10, at 1 (“Chinese nationals—including those with potential ties to the Chinese Communist Party (CCP)—are reportedly operating thousands of illicit marijuana farms across the country . . . Experts believe there is substantial evidence implicating the CCP in directly supporting illicit marijuana grow operations across the United States.”) (footnotes omitted).

<sup>14</sup>Rotella et al., supra note 10 (referencing U.S. Senate Comm. on Armed Services Hearing on U.S. Southern & Northern Commands (Mar. 16, 2021) (testimony of Admiral Craig Faller, Commander, U.S. Southern Command) [hereafter Admiral Faller testimony], <https://www.youtube.com/watch?v=0lu5Bdxr8QI&t=4765s> (last accessed Sept. 10, 2025).

<sup>15</sup>Fertig, supra note 10.

<sup>16</sup>Id.

<sup>17</sup>Rotella et al., supra note 10 (“The photos look like a routine encounter between a senior Chinese diplomat and immigrants in the American heartland: dutiful smiles, casual clothes, a teapot on a table, Chinese and U.S. flags on the wall. [¶] But behind the images, there is a potentially concerning story. During two trips to Oklahoma, Consul General Zhu Di of the Chinese embassy visited a cultural association that has been a target of investigations into Chinese mafias that dominate the State’s billion-dollar marijuana industry. And the community leaders posing with him in the photos? A number of them have pleaded guilty or been prosecuted or investigated for drug-related crimes, according to court documents, public records, photos and social media posts. [¶] ‘He’s meeting with known criminals, said Donnie Anderson, the director of the Oklahoma Bureau of Narcotics and Dangerous Drugs Control, in an interview.’); id. (“After a mass murder at a marijuana farm, a Chinese diplomat visited an organization that has been the subject of investigations. The meetings reflect an international pattern of contacts between Chinese officials and suspected criminal networks. [¶] . . . During two trips to Oklahoma, Consul General Zhu Di of the Chinese embassy visited a cultural association that has been a target of investigations into Chinese mafias that dominate the State’s billion-dollar marijuana industry. And the community leaders posing with him in the photos? A number of them have pleaded guilty or been prosecuted or investigated for drug-related crimes, according to court documents, public records, photos and social media posts. [¶] ‘He’s meeting with known criminals,’ said Donnie Anderson, the director of the Oklahoma Bureau of Narcotics and Dangerous Drugs Control, in an interview. [¶] There is no indication of wrongdoing by the consul general, who is one of China’s top diplomats in the United States. Still, the encounters in Oklahoma reflect a pattern of contacts around the world between China’s authoritarian government and diaspora leaders linked to criminal activity—a subject of increasing concern among Western national security officials, human rights groups and Chinese dissidents.”).

<sup>18</sup>*Ianelli v. United States*, 420 U.S. 770, 777 (1975). See generally Paul J. Larkin, *The Criminal Responsibility of Parties Who Traffic in Fentanyl Precursor Chemicals*, HERITAGE FOUND. Special Report No. 320, at 5 & 26 nn.55–60 (2025).

<sup>19</sup>*Global-Tech Appliances, Inc. v. SEB S.A.*, 563 U.S. 754, 766 (2011).

that the government may establish proof of a conspiracy entirely through circumstantial evidence,<sup>20</sup> which appears to be in ample supply on this point.<sup>21</sup>

### III. STEPS THAT THE FEDERAL GOVERNMENT MAY TAKE TO ARREST AND CLAW BACK THE INFILTRATION OF CHINESE ORGANIZED CRIME IN THE STATE-LEGAL CANNABIS INDUSTRY

#### A. *Actions that the States and Federal Executive Branch Can Take Without the Need for New Substantive Federal Legislation*

There are various steps that the States and the Executive Branch can take to address this problem.<sup>22</sup> For example, if a State has not yet adopted a medical- or recreational use cannabis regime, the State should not do so. In addition, States can take various actions to protect the Nation against the PRC's interest in acquiring real estate for spying or illegal drug activity, such as requiring real estate purchasers and lessees to identify all foreign individuals and foreign-owned or foreign-controlled companies with a legal or financial interest in their purchases or rentals. That would help to prevent the PRC from using third parties or sham corporations to obtain property for use as an indoor cultivation or production site for cannabis.

The U.S. Department of Justice also should undertake aggressive criminal investigations into, and prosecution of, the actions of Chinese organized crime elements for violations of one or more of several Federal criminal laws. The most obvious place to start is with the Controlled Substances Act of 1970. Cannabis is a Schedule I drug, the category for drugs that lack a current medical use, have a high potential for abuse, and are dangerous even when used under a physician's supervision.<sup>23</sup> The cultivation and distribution of cannabis is a felony under Federal law punishable by a lengthy term of imprisonment<sup>24</sup> that depends on the weight of a "mixture or substance" containing a detectable amount of delta-9-tetrahydrocannabinol (THC).<sup>25</sup> The Department charged the parties in Maine and Massachusetts cases noted above with such drug offenses, for example.<sup>26</sup>

But that is not all. From media reports and elsewhere, there appears to be evidence worth pursuing regarding the commission of other Federal crimes that are ancillary to Chinese organized crime's cannabis trafficking.<sup>27</sup> Those offenses might in-

<sup>20</sup> See *Holland v. United States*, 348 U.S. 121, 140 (1954) ("Circumstantial evidence in this respect is intrinsically no different from testimonial evidence. Admittedly, circumstantial evidence may in some cases point to a wholly incorrect result. Yet this is equally true of testimonial evidence. In both instances, a jury is asked to weigh the chances that the evidence correctly points to guilt as against the possibility of inaccuracy or ambiguous inference. In both, the jury must use its experience with people and events in weighing the probabilities. If the jury is convinced beyond a reasonable doubt, we can require no more.")

<sup>21</sup> For example, evidence that the PRC government is aware of and might be complicit in money laundering was found on encrypted cell phones seized in a DEA investigation. See Sebastian Rotella & Kirsten Berg, *How a Chinese American Gangster Transformed Money Laundering for Drug Cartels*, PROPUBLICA, Oct. 11, 2022, <https://www.propublica.org/article/china-cartels-xizhi-li-money-laundering> (last accessed Aug. 3, 2025) ("There is no question there is interconnectivity between Chinese organized crime and the Chinese state, said [former senior FBI Official Frank] Montoya, Jr.]. 'The party operates in organized crime-type fashion. There are parallels to Russia, where organized crime has been co-opted by the Russian government and Putin's security services.'"); id. ("Looking at Chen's smartphones, the agents were able for the first time to read the suspects' most sensitive conversations on WeChat, an application for messaging and commerce. WeChat is ubiquitous in China and the Chinese diaspora and impenetrable to U.S. law enforcement. Because it uses a form of partial encryption allowing the company access to content, WeChat is closely monitored by the Chinese state, according to U.S. national security veterans. [¶] U.S. officials view the brazen use of WeChat for money laundering as another suggestive piece of evidence that authorities in Beijing know what is going on. [¶] 'It is all happening on WeChat,' Cindric said. 'The Chinese government is clearly aware of it. The launderers are not concealing themselves on WeChat.'")

<sup>22</sup> See Larkin, *China and Cannabis*, supra note 2, at 6–7.

<sup>23</sup> 21 U.S.C. §§ 801, 802, 841(6), (10)–(12), (15)–(16), (22), 812(a), (b) & Schedule I (West 2025).

<sup>24</sup> A term that can include life imprisonment without the possibility of parole if an offender is convicted for violating the Continuing Criminal Enterprise Act, 21 U.S.C. § 848 (West 2025).

<sup>25</sup> 21 U.S.C. § 841; see *Chapman v. United States*, 500 U.S. 453, 456–64 (1991).

<sup>26</sup> DOJ, *Seven Chinese Nationals Charged*, supra note 10.

<sup>27</sup> *HIDTA Report on China and Cannabis*, supra note 7, at 4 ("One tactic discovered to be utilized by a New Mexico-based criminal organization was to target Chinese immigrants who lost work during the COVID–19 pandemic. Their sophisticated recruitment strategy included: Social media advertisements promising \$200 daily wages; False job descriptions of legitimate agricultural work, i.e. 'gardening' and 'flower cutting'; Guaranteed housing and meals.] . . . The reality these workers face stands in stark contrast to the promises made. It was documented in New Mexico that workers were being forced to endure 14-hour workdays, while living in deplorable conditions. In another operation in Oklahoma, 20–30 people were found crammed into a single room with just one bathroom and no air conditioning. Workers often sleep in various makeshift accommodations: Wooden sheds with dirt floors; Trailers without basic utilities;

Continued

clude money laundering, involuntary servitude, human trafficking, prostitution, fraud, and other Federal offenses, such as violent crimes.<sup>28</sup> Those offenses might already be under investigation by the Federal Government. If not, they should be.

#### B. Actions that Congress Can Take

Congress should consider whether Federal legislation is necessary to protect uniquely national interests. The Federal Government has a surpassing interest in preventing any foreign power or nationals from purchasing or renting property that enables it or them to spy on sensitive Federal locations (such as military bases), to commit Federal offenses, or to generate illegal funds that can be used to undermine

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Greenhouse floors; Fields and ditches, exposed to the elements[.]” (punctuation omitted); id. at 5 (“The New Mexico and Oklahoma investigations have revealed severe human rights violations, and the similarities between the operations have identified a suspected pattern of activity. Upon arrival, workers often have their phones and car keys confiscated. Cases have been documented where armed guards with guns and machetes patrol the premises, and workers face constant surveillance through cameras and security personnel. The exploitation extends beyond confinement. Workers report receiving no payment for their labor, with some owed up to \$12,000 in promised wages. Numerous cases were encountered where workers were exposed to dangerous chemicals, resulting in visible burns on their hands and arms. Many appeared malnourished and showed signs of physical abuse. [¶] Perhaps most disturbing is the discovery of human trafficking elements. Evidence has been found of workers being smuggled directly to farms through Mexican border crossings, with farm owners paying approximately \$20,000 per worker to trafficking networks. These workers are then forced to work for 2 years to pay off their “debt.” When workers attempt to demand their wages, they can face violent retaliation. In one instance, a worker who requested payment found himself being threatened by a guard armed with an AK-47 semi-automatic rifle. The presence of drugs, cash, and weapons has created an environment where violence is commonplace, and workers live in constant fear of retaliation if they speak out or attempt to escape.”) (footnotes omitted).

<sup>28</sup> See, e.g., id. at 4 (“One tactic discovered to be utilized by a New Mexico-based criminal organization was to target Chinese immigrants who lost work during the COVID-19 pandemic. Their sophisticated recruitment strategy included: Social media advertisements promising \$200 daily; wages; False job descriptions of legitimate agricultural work, i.e. ‘gardening’ and ‘flower cutting’; Guaranteed housing and meals[.] . . . The reality these workers face stands in stark contrast to the promises made. It was documented in New Mexico that workers were being forced to endure 14-hour workdays, while living in deplorable conditions. In another operation in Oklahoma, 20-30 people were found crammed into a single room with just one bathroom and no air conditioning. Workers often sleep in various makeshift accommodations: Wooden sheds with dirt floors; Trailers without basic utilities; Greenhouse floors; Fields and ditches, exposed to the elements[.]”) (footnotes and punctuation omitted); Ernst Letter, supra note 10 (“In some cases, the grow operators were also engaged in human trafficking, forced labor, drug trafficking, and violent crime.”); Admiral Faller Testimony, supra note 11, at 63 (“The money-laundering connection is the most significant, where Chinese money laundering underwrites TCOs [to] a significant proportion, and that is something that we are tracking as part of all interagency effort here in the United States.”) JOHN A. CASSARA, *CHINA-SPECIFIED UNLAWFUL ACTIVITIES: CCP INC., TRANSNATIONAL CRIME AND MONEY LAUNDERING* 34 (2023) (“According to the FBI, Chinese criminal enterprises conduct traditional racketeering activities normally associated with organized crime including extortion, murder, kidnapping, illegal gambling, prostitution, and loansharking. They engage in human trafficking, traffic heroin and methamphetamine, commit financial frauds, engage in auto theft, deal in illicit tobacco products, trade in counterfeit goods, and other criminal activities. They launder the proceeds of the crime.”); id. (noting that a “defining characteristic” of Chinese criminal enterprises is violence); Nolan Clay, *He Ran a Brothel for Oklahoma Marijuana Farms. Now He’s Going to Prison*, THE OKLAHOMAN, July 15, 2025, [www.oklahoman.com/story/news/crime/2025/07/11/a-pimp-for-oklahomas-medical-marijuana-farms-sentenced-to-prison/84620520007/](http://www.oklahoman.com/story/news/crime/2025/07/11/a-pimp-for-oklahomas-medical-marijuana-farms-sentenced-to-prison/84620520007/) (“The boss of a brothel for Oklahoma’s pot farms has been sentenced to 20 years in prison for sex trafficking.”); Feng, supra note 10 (“Last summer, New Mexico State special agents inspecting a farm found thousands more cannabis plants than State laws allow. Then on subsequent visits, they made another unexpected discovery: dozens of underfed, shell-shocked Chinese workers. The workers said they had been trafficked to the farm in Torrance County, N.M., were prevented from leaving and never got paid.”); Tom James, *The Failed Promise of Legal Pot*, ATLANTIC, May 9, 2016, <https://www.theatlantic.com/politics/archive/2016/05/legal-pot-and-the-black-market/481506/> (quoting Oklahoma Assistant Attorney General Emily Grossnicklaus: “These women are treated as property rather than human beings.”); Qi, supra note 10 (“According to a social-media post by the Oklahoma Narcotics Bureau, the State indicted two Chinese men on human-trafficking charges, alleging that they operated an Oklahoma City brothel where between late last year and early this year, approximately a dozen women were trafficked. [¶] ‘Evidence from the investigation shows many of the clients of the brothel were managers and administrators of commercial marijuana farms,’ the post said. The men couldn’t be reached for comment.”); Nicole Sganga et al., *Black Market Marijuana Tied to Chinese Criminal Networks Infiltrates Maine*, CBS NEWS, Apr. 26, 2024, <https://www.cbsnews.com/news/black-market-marijuana-tied-to-chinese-criminal-networks-infiltrates-maine/> (“Donovan told CBS News that some of the people working in marijuana grow operations around the country are Chinese nationals who are victims of labor trafficking. [¶] ‘[They’re] brought here under the auspices that they’re working under a legit business,’ he said. ‘And they’re often kept unwillingly in these locations and told what to do to oversee the cultivation of these marijuana plants.’”) (last accessed Aug. 1, 2025).

American interests in other ways. States cannot adopt domestic laws that interfere with the Nation's foreign policy, which is a uniquely Federal interest, as the Supreme Court recognized in *Zschernig v. Miller*.<sup>29</sup> As the Supreme Court explained in *Haig v. Agee*, “[i]t is ‘obvious and unarguable’ that no governmental interest is more compelling than the security of the Nation.” Accordingly, Congressional actions would be entirely appropriate.

1. *Congress could establish a uniform property acquisition rule across the States.*

Zschernig makes it clear that the President and Congress have broad power to define the Nation's foreign policy and protect its residents against harms resulting from foreign powers. Cannabis use, particularly by military age men and women, can weaken our national security by reducing, perhaps greatly, the number of potential soldiers, sailors, airmen, and Marines who are qualified and fit to serve. Congress therefore could regulate the acquisition of property, whether by purchase or leasehold, by anyone who is acting on behalf of, at the instigation of, or for the benefit of a foreign party, particularly the PRC or CCP. At a minimum, Congress could require that property owners notify the U.S. Department of Homeland Security whenever a Chinese national buys or leases real property.<sup>30</sup>

2. *Congress could expand the authority of the Committee on Foreign Investment in the United States.*

Established by President Gerald Ford pursuant to the Defense Production Act (DPA) of 1950, the Committee on Foreign Investment in the United States (CFIUS) is an interagency committee authorized to review certain transactions involving domestic foreign investment, including certain real estate transactions by foreign parties.<sup>31</sup> The committee has the authority to review such deals and advise the President as to whether to prohibit the transaction or allow it to go forward under whatever conditions he deems appropriate if he finds “credible evidence” that the transaction “threatens to impair the national security of the United States.”<sup>32</sup>

Nevertheless, the CFIUS screen is not impermeable. Not every type of real estate transaction must be reported. CFIUS has decided that it lacks jurisdiction over so-called greenfield or start-up investments, and some parties have not made the necessary disclosures even for a “covered transaction,” which deprives CFIUS and the President of the information needed to decide whether to allow a particular transaction to go forward. Accordingly, Congress could revise the DPA to make it clear that there is no greenfield exception to CFIUS's jurisdiction.

#### CONCLUSION

The High Intensity Drug Task Forces recently concluded that the problem discussed above “represent[s] a critical national security threat requiring coordinated Federal response, specialized investigative units, and comprehensive legislative action to close regulatory loopholes that enable these criminal enterprises to operate.”<sup>33</sup> There are steps that Congress can take to expose those enterprises and their illegal activities. The Homeland Security Committee and its Subcommittee on Oversight, Investigations, and Accountability has done the public a great service by exposing what is happening today. With luck, Congress will move forward to stem these problems.

#### APPENDIX

[The supplemental documents referred to may be found at <https://www.heritage.org/china/report/china-and-cannabis> and <https://www.heritage.org/crime-and-justice/report/twenty-first-century-illicit-drugs-and-their-discontents-the-failure>.]

Chairman BRECHEEN. Thank you, Mr. Larkin.  
Mr. Urben, you are now recognized for your 5 minutes.

<sup>29</sup> 389 U.S. 429 (1968); see Larkin, *China and Cannabis*, supra note 2, at 8 (discussing the Zschernig case).

<sup>30</sup> Other nations potentially subject to the same treatment would be Iran, North Korea, and Russia.

<sup>31</sup> Larkin, *China and Cannabis*, supra note 2, at 9; see also Bryan Burack, *China's Land Grab: The Sale of U.S. Real Estate to Foreign Adversaries Threatens National Security*, HERITAGE FOUND. Backgrounder No. 3825 (2024).

<sup>32</sup> 50 U.S.C. ch. 55, §§ 4501–4518.

<sup>33</sup> *HIDTA Report on China and Cannabis*, supra note 7, at 9.

**STATEMENT OF CHRISTOPHER URBEN, MANAGING DIRECTOR,  
NARDELLO & CO.**

Mr. URBEN. Committee Chairman Garbarino, Committee Ranking Member Thompson, Ranking Member Thanedar, and distinguished Members of this subcommittee, thank you for the opportunity today to address you on the growth of Chinese organized crime in the United States and the role of marijuana cultivation and distribution in facilitating that growth.

During my 24-year career with the DEA as an agent and executive, I saw first-hand the damage done by transnational criminal organizations, TCOs and the increasingly significant operations of Chinese transnational criminal organizations. Over the last 5 years of my career, I led a team at DEA's Special Operations Division, SOD, dedicated to an operation called Project Sleeping Giant, which sought to understand, identify, target Chinese organized crime operating in the United States and abroad. We were particularly concerned about the rise of Chinese money-laundering networks which have transformed narcotics trafficking by offering dramatically lower rates, lower risk, and quicker return of funds than the networks that had previously laundered those funds.

Project Sleeping Giant's objectives included understanding the Chinese organized crime threat, developing intelligence on it, and designing enforcement operations to mitigate it. As a result of the investigative and intelligence-gathering operation, we learned that Chinese organized crime was involved in a wide range of criminal activity globally, including being the Chinese suppliers of precursor chemicals used in fentanyl production in Mexico, becoming the primary money launderers for the Mexican cartels which have been recently designated as FTOs, human trafficking networks, global operations that corrupt government authorities, wildlife trafficking networks, and, of course, Chinese-controlled marijuana cultivation within the United States.

So what have the Chinese money launderers done with the proceeds of their criminal activity? Starting in 2017, when a wave of marijuana legalization was sweeping through the United States, we started seeing the profits of the laundering of Mexican cartel proceeds get invested into marijuana cultivation and distribution operations by Chinese money launderers. The speed and organization in which the Chinese-controlled marijuana grows were established was nothing short of remarkable.

As the Chinese money launderers provided the funding for the grows, trafficked Chinese citizens into the United States to live at the grow locations, tending to the plants on a 24/7 basis, they then trafficked the marijuana to cities for sale. All of this happened seamlessly. It was extremely well-organized because it was being managed by Chinese organized crime and Chinese money launderers at the leadership and command-and-control level.

What is the best way to combat the threat? First, there is a critical need for local, State, and Federal officials to recognize that activities, including Chinese marijuana grows and distribution operations, are not just weed cases. They are harmful in and of themselves and they also help fuel Chinese money launderers and organize crime-linked activity, such as human trafficking, fentanyl distribution, and other dangerous harmful activities. These cases

should be prioritized as they are linked to the larger criminal networks.

State and local governments individually do not have the necessary resources and authorities to attack and dismantle Chinese marijuana trafficking networks. State and local governments typically lack the subject-matter experts, language skills, data scientists, confidential sources, and other law enforcement capabilities that are needed to address the threat. Federal funding, coordination, and authority, combined with State and local resources, intelligence, and their authorities, is desperately needed. It is essential to use the Federal racketeering, money laundering, continuing criminal enterprise prosecutions to target the leadership and command-and-control levels of these operations, similar to what we did in the late 1980's and 1990's against Italian organized crime for organized crime leaders.

Chinese organized crime leaders need to understand that the Federal Government will aggressively target them with severe consequences. Using other Federal authorities to target the related crimes such as human trafficking, money laundering, tax evasion, mortgage fraud, as well as State and local laws and regulations governing the cultivation operations themselves and those governing land, power use, and water violations will have a material impact.

Last, even at the Federal level, specialized task forces are needed to effectively target Chinese money launderers and Chinese organized crime engaged in marijuana trafficking activity. A fully-funded intergovernmental platform will allow for law enforcement to better identify the criminal networks and dismantle them State by State. Congress can play a vital role in providing resources, incentives, and authority to the Federal Government.

Thank you for the opportunity today to engage in this conversation.

[The prepared statement of Mr. Urben follows:]

PREPARED STATEMENT OF CHRISTOPHER URBEN

SEPTEMBER 18, 2025

Committee Chairman Garbarino, Subcommittee Chairman Brecheen, Committee Ranking Member Thompson, Subcommittee Ranking Member Thanedar, and distinguished Members of this subcommittee, thank you for the opportunity to address you today on the growth of Chinese organized crime in the United States, and the role of marijuana cultivation and distribution in facilitating that growth.

During my 24-year career as an agent and executive with the DEA, I saw firsthand the damage done by transnational criminal organizations ("TCOs") and the increasingly significant operations of Chinese transnational criminal organizations. Over the last 5 years of my career, I led a team at DEA's Special Operations Division dedicated to Project Sleeping Giant, which sought to understand, identify, and target Chinese TCOs operating in the United States. We were particularly concerned about the rise of Chinese money-laundering networks ("CMLNs"), which have transformed narcotics trafficking by offering dramatically lower rates, lower risk, and quicker return of funds than the networks that had laundered money for TCOs previously. Project Sleeping Giant's objectives included understanding the Chinese organized crime threat, developing intelligence on it, and designing enforcement operations to mitigate it.

As a result of this investigative and intelligence-gathering operation, we learned that CMLNs launder money for a wide range of criminal organizations, including Chinese suppliers of precursor chemicals used in fentanyl production in Mexico; Mexican cartels that manufacture fentanyl and other narcotics for U.S. consumption; human trafficking networks; global operations that corrupt government au-

thorities; wildlife traffickers; and Mexican and other growers and distributors of black-market marijuana within the United States.

I have been privileged to testify previously before Congress about the growth of CMLNs and why they have been so effective in laundering crime proceeds. Just weeks ago, on August 28, 2025, the U.S. Department of Treasury's Financial Crimes Enforcement Network ("FinCEN") officially raised the alarm on the growth of CMLNs in the United States and the threat they pose to the U.S. financial system.<sup>1</sup> In connection with that announcement, FinCEN issued an Advisory to U.S. financial institutions and a Financial Trend Analysis highlighting the scope and breadth of CMLN activity in the United States. The statistics cited by FinCEN are eye-opening: in the past 5 years, over \$312 billion in transactions flagged as potentially tied to CMLN activity moved through U.S. financial institutions. This statistic does not include funds moved through the informal economy or through other means, including cryptocurrency, which have not been subject to formal FinCEN oversight.

So, what have CMLNs done with the proceeds of their criminal activity? Starting in 2017, when a wave of marijuana legalization was sweeping the country, we started seeing the proceeds get invested into marijuana cultivation and distribution operations. The CMLNs (i) established grow operations ("grows") in suburban homes they purchased and outfitted for indoor cultivation of high-end marijuana; (ii) grew marijuana outdoors in rural, agricultural settings; and (iii) distributed the marijuana and laundering the proceeds through existing networks.

The speed and organization in which the Chinese-controlled marijuana grows were established was remarkable, as the CMLNs provided the funding for the grows, trafficked Chinese citizens into the United States to live at the grow locations, tending to the plants on a 24/7 basis. They then trafficked the marijuana to cities for sale. All of this happened seamlessly. It was extremely well-organized because it was being managed by Chinese organized crime and Chinese money launderers at the leadership and command/control level. In fact, Chinese OC began to establish "legitimate" supply stores to sell the equipment needed to grow marijuana on an industrial scale.

Since leaving the DEA and joining the global investigative firm of Nardello & Co., I have seen CMLNs, and marijuana grows linked to CMLNs or other TCOs, grow significantly larger. Fueled by the increased power and scale of CMLNs, these grow operations have taken advantage of additional legalization efforts around the country and the increased demand for marijuana. They earn billions of dollars in revenue that in turn feeds the other criminal activities that CMLNs support.

Legalization by States has been tied to the growth of illicit Chinese-linked grow and distribution operations for several reasons. First, legalization efforts have imposed high taxes and strict growing, testing, and licensing requirements on government-approved growers and sellers of marijuana. This has allowed the black market for the drug to persist, as it offers a less expensive product—untaxed marijuana grown without regulation—delivered more conveniently, via street transactions or unlicensed channels, and quickly than government-approved alternatives. Second, legalization reduced penalties for unlawful possession and distribution of the drug at the same time it created a lawful channel for it to be possessed and distributed. This reduced the risks to criminal actors, including CMLNs, of severe criminal sanctions as a result of their unlawful operations, freeing them to invest their illicit proceeds in marijuana grow and distribution operations. As a result, illicit marijuana production and distribution, especially when run by TCOs, will always have a competitive advantage over any licensed marijuana businesses.

Third, legalization increased marketplace demand by making it more acceptable for consumers to use marijuana. This helps support the legal market for the drug, but it also increases the supply of potential customers for black-market marijuana that is distributed by CMLNs and other TCOs.

The effects of Chinese TCOs' involvement in marijuana cultivation and distribution have been extensive. Demand for land and structures suitable for marijuana cultivation and distribution are affecting real estate values in many locations in the country. The growth techniques used in marijuana cultivation are harming the environment. The proceeds are undermining banking laws and regulations while supplying income to some of the most violent gangs.

My work in the DEA and subsequent investigative efforts, have confirmed the existence of Chinese-controlled marijuana growing operations in numerous States, including Arizona, California, Colorado, Maine, Massachusetts, New Hampshire, New Mexico, Oklahoma, Oregon, Rhode Island, and Washington. In the many other

<sup>1</sup> <https://www.fincen.gov/news/news-releases/fincen-issues-advisory-and-financial-trend-analysis-chinese-money-laundering>.

States that likely host similar operations, State and local law enforcement have yet been detected their existence or understand their links to national and TCOs.

What is the best way to combat this threat? First, there is a critical need for local, State, and Federal officials to recognize that activities involving Chinese TCO-linked marijuana grow and distribution operations are not “just weed cases.” They are harmful in and of themselves, and they also help fuel CMLNs and other Chinese TCO-linked activity such as human trafficking, fentanyl distribution, and other dangerous and harmful activities. These cases should be prioritized as they are linked to larger criminal networks and activities, including prosecutable money-laundering schemes.

My time at DEA’s Special Operations Division and my work at Nardello & Co. have led me to conclude that the U.S. law enforcement community and the U.S. financial system needs significant new authority, guidance, and resources to understand and combat the threat posed by Chinese organized crime and CMLOs. Recently, Congress and the Executive branch designated the Mexican Cartels as foreign terrorist organizations, and it is clear that—as recognized by FinCEN in its recent guidance—CMLNs are key facilitators for the Mexican cartels. While Congress has passed legislation like the FEND OFF Fentanyl Act and the HALT Act and provided funding and authority to restrict cross-border smuggling activity that facilitates the movement of marijuana and crime proceeds, and FinCEN’s recent guidance will help financial institutions understand the scale and operations of CMLNs, more help is needed.

State and local governments individually do not have the necessary resources and authorities to attack and dismantle Chinese marijuana trafficking networks. State and local governments typically lack the subject-matter experts, language skills, data scientists, confidential sources, and other law enforcement capabilities that are needed to address this threat. Federal funding, coordination, and authority, combined with State and local resources and authorities, are desperately needed. It is essential to use Federal racketeering, money laundering, and continuing criminal enterprise prosecutions to target the leadership and command-and-control levels of these operations so that their leaders understand the Federal Government will not be lenient with them merely because they are selling drugs that have been legalized in places, and under circumstances, that do not apply to them. Using other Federal authorities to target related crimes such as human smuggling, money laundering, tax evasion, and mortgage fraud, as well as State and local laws and regulations governing cultivation operations, including those governing land use and power and water violations, will have a material impact on these criminal organizations.

Even at the Federal level, more subject-matter experts, data scientists, translators of Mandarin and other Chinese dialects, and specialized task forces are needed to effectively target CMLNs and other Chinese TCOs engaged in marijuana trafficking activity. A fully-funded intergovernmental platform would allow law enforcement to better identify criminal networks and dismantle them—State by State. Congress can play a vital role by providing resources, incentives and authority for the Federal Government to engage in intensive enforcement operations to combat this threat.

Thank you for the opportunity to engage in this discussion today.

Chairman BRECHEEN. Thank you, Mr. Urben.

Members will be recognized by seniority for 5 minutes of questioning. Additional rounds of questioning may be called after all Members had the opportunity.

I now recognize myself for 5 minutes of questioning.

Director Anderson, can you describe how Oklahoma has become a hotbed for illegal marijuana grow operations and can you put that in the context as it is compared against the other 49 States?

Mr. ANDERSON. Well, what happened with Oklahoma was, No. 1, Oklahoma is a very rural State, has a very—has a lack of resources when it comes to public safety. We also have very cheap farmland. So we also have the most liberal marijuana laws in the Union. So whenever Oklahoma enacted the medical marijuana statute that we passed, it opened up Pandora’s box for Oklahoma. So what you had, you had a very organized group of Chinese nationals who actually—this isn’t just in the United States, they’re global with what they’re doing, but they own the market of marijuana. They actually

took a market that was the No. 1 cash drug crop for the cartel and they own that and they've owned that for a few several years now.

They moved those operations because of crackdowns that were going on in New Mexico and California to Oklahoma. No. 1, because it is rural to, No. 2, the land is very, very cheap. What you can buy 80 acres in Oklahoma, what you can buy a block for in California. Commonly, with our lax laws, that is exactly what happened in Oklahoma.

Chairman BRECHEEN. Mr. Urben, you mentioned a minute ago, if I remember hearing you correctly, 300 billion is what you all have seen is the 2025 number of illicit marijuana being moved across the United States. Did I understand that stat correctly, 300 billion?

Mr. URBEN. I believe that's correct. It was in my written statements. In the time period, it's a massive amount of money.

Chairman BRECHEEN. In tandem with what Mr. Anderson is talking about, when they are looking at the amount of plants in Oklahoma compared—that they have registration on, compared to what they know they are able to produce and what has been unreported, Oklahoma alone believes they have \$150 billion per year illicit marijuana industry. To put that in context, the State budget of Oklahoma to run all areas of governance from the State level in Oklahoma is 13 billion. Ten times the State budget is the illegal activity of marijuana. It is why it has sadly become, and I hate this for my State, a leading exporter of marijuana in this Nation, illegal marijuana export. It is almost half of the number that I think the DEA is looking at. That is just astounding.

Director Anderson, what kind of response are we getting in Oklahoma in terms of knowing that—what has opened this thing up? What do you think that it is going to take for the average person in Oklahoma to realize this is such a problem and that this is not something that we can—as you cite the homicides in Hennessey, we have got McAlester Ammunition Plant that there is some activity adjacent to it, where one-third of all munitions for this country come for in McAlester, Oklahoma, the Congressional district that I represent, munitions for our national defense and Chinese nationalists adjacent to it, that there is some concern about illicit activity. What is it going to take for Oklahoma, for the grassroots that ultimately drives—manifest itself where the legislature then makes some changes? What does the law enforcement have to do to get the attention of Oklahoma officials?

Mr. ANDERSON. Thank you for the question. I wish I knew the answer to that because I've been trying for 5 years. I will say we are starting to gain traction now as far as global—or nationwide what's going on in Oklahoma. Because literally, what's going on in Oklahoma, whenever I talk about the 85 million pounds that's unaccounted for, that's going across the United States. Understand that's what we know is there. There's no telling how much that really is. Because if we know there's 85 million unaccounted for, is there another 85 million or 100 billion that we don't know about? Because typically, when we go into these operations, they don't have metric tags on them. They tag a few. You may have 30,000 plants, they may have a thousand of those tagged. So there's a lot more that's not tagged in there than there is tagged. But I do think

we're making some headway as far as letting people know what's going on.

For me, this isn't about—I want to be very clear, this isn't just about marijuana. I'm not talking about mom-and-pop operations or even about people who utilize marijuana for whatever medical purpose they use it for. I'm talking about real organized transnational criminals who do not have our best interests at heart. When I say our best interests, I'm talking about the American people as a whole. So that is my biggest concern with what's going on with this whole catastrophe in Oklahoma.

Chairman BRECHEEN. I now recognize Mr. Thanedar for his 5 minutes of questions.

Mr. THANEDAR. Thank you, Chairman. Look, drug cartels and criminal organizations, including those from Mexico, Cuba, and China, are illegally cultivating marijuana across the United States. They often disguise their illegal operations by hiding in States where law-abiding growers operate. But these illegal marijuana grows are dangerous. They rely on human trafficking for cheap labor and sexual exploitation. They steal water and energy from surrounding communities. They sow the grounds with pesticides and chemicals that seep or run off into our water. They spray the marijuana with chemicals that end up being consumed by people here in the United States.

Mr. Urben, how should the Federal Government respond to illegal marijuana cultivation, especially when it comes to combating international criminal organization that are operating across the United States? What does a whole-of-Government approach look like from your experience?

Mr. URBEN. So from my experience, sir, I mean, you laid out all the variety of crimes and activity that was taking place in these cultivation areas. I think it's very simply we need to mandate a solution from the Federal Government. We need to provide the funding, for example, Mr. Anderson, in Oklahoma. What I would suggest is we need to target the network and defeat the whole network. So you can use Chinese organized crime as an example, but you could also lay, you know, other organized crime elements in this, but we'll stick with Chinese organized crime right now.

Federal funding a task force that would target that entire network operating in the United States abroad. The funding is expensive for personnel and overtime, as Mr. Anderson would probably attest to. There's air and land assets that you need, but we need a Federal task force comprised of DEA, HSI, FBI to include their counterintelligence side because there is a counterintelligence component to this IRS, Fish and Wildlife, and then, again, successes that we've had in the past, partnering with State and locals who have the expertise and intelligence and know-how on the ground and using their authorities.

It's a national security issue. The task force funding would employ essentially a platform of these Federal agencies combined with subject-matter experts, translators of various Chinese dialects in this example, data scientists and targeters, funding to recruit confidential sources, and also coordination with State and local prosecutors. The mandated task force would target them with Federal prosecutors as well.

Mr. THANEDAR. Thank you. Thank you, Mr. Urben.

The Chinese have become the dominant players in illegal marijuana cultivation, but they are not the only players. How do we make sure the Federal Government is able to help State, local, Tribal, and territorial law enforcement combat the big guys, the Chinese criminal organizations as well as the smaller players?

Look, in Michigan, earlier this week, a 50-year-old man was arraigned on charges of tax evasion related to an illegal marijuana grow operation that he ran for 2 years. When his home was searched, police found more than 1,000 marijuana plants and 50 pounds of processed marijuana. Just 2 months ago, Michigan State Police seized more than 10 million worth of marijuana at an illegal marijuana grow operation. That grow operation was in a 17,000-square-foot warehouse situated on 19 acres. In June, 4 Chinese nationals were arrested in Michigan for growing \$5 million worth of illegal marijuana.

Mr. Urben, clearly illegal marijuana grow operations are profitable business and they are hidden in plain sight. What obstacles do Federal, State, and local law enforcement face when trying to combat illegal marijuana grows? What can Congress do to help find, prosecute these farms and those who operate them?

Mr. URBEN. It's great question. Continuing on from the first question, the establishment of this task force would be paralleled by Federal and State prosecutors that would utilize, like I mentioned earlier, the racketeering, continuing criminal enterprise, and money-laundering laws to target command-and-control leadership at the highest levels in terms of the organized crime groups, the Chinese operating in this area. The task force would also have tactical ability to move from State to State and enforce the law.

Mr. THANEDAR. Thank you Mr. Urben. My time is up. Chairman, I yield back.

Chairman BRECHEEN. The gentleman yields.

I now recognize Ms. Greene from Georgia for her 5 minutes of questioning.

Ms. GREENE. Before my 5 minutes, Mr. Chairman, ask unanimous consent to enter for the record this article, "Triad Weed: How Chinese Marijuana Grows Took Over Rural Maine." This is an article that highlights how Chinese TCOs are basically taking over Maine via these illegal grow farms.

Chairman BRECHEEN. Without objection, so ordered.

TRIAD WEED: HOW CHINESE MARIJUANA GROWS TOOK OVER RURAL MAINE

*By Steve Robinson, November 8, 2023*

*Updated: January 24, 2024*

<https://www.themainewire.com/2023/11/triad-weed-illegal-chinese-marijuana-grows-are-all-over-maine/>

Illegal Chinese marijuana grows have taken over much of rural Maine.

The government is either incapable—or unwilling—to do anything about it.

The Maine Wire has identified more than 100 properties that are part of a sprawling network of Chinese-owned sites operating as unlicensed, illicit cannabis growing operations in rural Maine.

According to an unclassified memo from the U.S. Department of Homeland Security (DHS) obtained by the Maine Wire, the illicit grows are operated by Asian Transnational Criminal Organizations (TCOs).

The properties cover Somerset County, Penobscot County, Kennebec County, Franklin County, Androscoggin County, and Oxford County.

The sites were purchased over the past 3 years by single adults, primarily from New York and Massachusetts, using cash or financing arranged through a handful of mortgage companies.

The Maine Wire investigation began following the leak of a separate DHS memo that revealed the existence of more than 270 such sites in Maine.

That memo, first reported by Jennie Taer of the Daily Caller News Foundation, offered the first public confirmation of what law enforcement officials have long known, but what neighbors to these properties and legal marijuana entrepreneurs have only suspected.

Namely, that Chinese foreign nationals are exploiting Maine's lax marijuana laws, the Biden Administration's immigration policies, and cheap real estate in rural Maine to grow a fortune using exploited illegal alien laborers.

Nationwide, there are approximately 749 properties that DHS has linked to Asian TCOs.

The leaked memo included a spreadsheet, which has not been made public, that identified "270 properties within [Maine] that are actively used by the Chinese in relation to their operations."

Local, State, county, and Federal officials, speaking mostly on the condition of anonymity, have confirmed to the Maine Wire that various law enforcement agencies have known about this foreign network of illicit drug manufacturing and distribution for more than two years.

On Sept. 15, DHS sent the following memo to Maine law enforcement asking for help gathering intel on the properties:

We are requesting a response by State, county, and/or local law enforcement officials with any information regarding illegal marijuana grows being operated in their areas by suspected Asian Transnational Criminal Organizations (TCO). This collection effort is supporting a national intelligence gathering initiative to identify a comprehensive picture of the threat posed to national security by Asian TCOs operating illegally in the United States.

A typical response may include:

- confirmation that this activity is occurring
- the number of suspected grows in your area of responsibility
- reports by concerned citizens or local officials relating to illegal grow operations by Asian TCOs or any other information respondents may deem of value.

"There are hundreds of these operations occurring throughout the State. It's upsetting to those who live near these operations, and even those who are following Maine laws and procedures," Penobscot County Sheriff Troy Morton told the DCNF.

Maine's congressional delegation has called upon the Department of Justice to shutter the operation, but Attorney General Merrick Garland has yet to respond in writing.

Most of the properties were acquired after Maine legalized the sale of recreational pot in 2020.

According to the DHS memos, the sites are operated by Chinese foreign nationals, some who are in the U.S. illegally. DHS believes the network earns an estimated total income of \$4.37 billion per year, some of which is returned to entities in the People's Republic of China.

The locations of the sites—and the names of their owners—have not been publicly released.

#### *Triad Weed in Rural Maine*

Marijuana grown at these sites is notorious in Maine's legal cannabis industry as "Triad weed."

"When I say they function like a mafia, it is absolutely true," one longtime veteran of Maine's medicinal and recreational pot industry told the Maine Wire. "They have a very intricate network."

Scrupulous dispensaries avoid purchasing or selling marijuana from the illicit grows because it has a reputation for containing pesticides, fungicides, and other banned or harmful contaminants.

But legal growers all agree that at least some Triad weed is entering Maine markets.

"I would say most of their product ends up skipping across the border," the industry veteran said. "But the shit that stays in Maine is what is helping to contribute to the collapse of flower prices."

The operators of these foreign-owned sites are also notorious around grow supply shops in Maine, where they are often found buying thousands of dollars in cultivation supplies.

Speaking little to no English, the operators acquire supplies by pointing at images on their phones or by having someone out-of-state translate over the phone.

According to DHS, the Asian TCOs use the proceeds of the marijuana grows to fund other illegal activities, including narcotics trafficking and human trafficking.

The DCNF reported, based on Maine and Federal sources, that many of the participants in the operation are either in the U.S. illegally or have applied for asylum status or permanent residency.

Morton, the sheriff of Penobscot County, told DCNF most individuals under investigation for being involved in illegal marijuana grows aren't U.S. citizens.

"Regardless of where the individuals are from, the true problem involves conflicting State and Federal laws. We also have little to no oversight, allowing for criminal activity to occur at a high degree," Morton said.

Morton declined to elaborate on those comments, instead referring the Maine Wire to the U.S. Attorney of Maine.

A spokesperson for the U.S. Attorney of Maine declined to comment for this story.

A spokesperson for U.S. Customs and Border Patrol, the agency that published the original leaked memo, declined to comment on the memo.

"The US Border Patrol coordinates closely with our interagency partners when conducting investigations and when taking enforcement actions," the spokesperson said. "It would not be appropriate for the USBP to comment on behalf of other agencies."

"Furthermore, Border Patrol does not publicly disclose sources of information, investigative methods, or other information that may jeopardize the safety of witnesses or otherwise compromise any investigation," said the spokesperson.

The Maine Wire offered to provide the U.S. Attorney of Maine and the Maine State Police with a list of illicit foreign-owned marijuana grows in Maine prior to the publication of this story, but both declined.

The Federal Bureau of Investigation, which has been investigating illegal Chinese marijuana grows in Maine for at least 2 years, declined to comment for this story.

#### *Finding Maine's Illegal Grow Sites—and Their Owners*

A review of real estate records, physical site inspections, and interviews with hundreds of Mainers has identified more than 100 Chinese-owned properties in Maine—all purchased by single men and women from out-of-state, primarily Brooklyn and Staten Island, over the past 3 years.

The buyers often pay cash, but dozens of the properties carry mortgages from just a few finance companies.

The sites are almost all in rural Maine and show evidence of active or recently active marijuana grow operations, including grow supplies and the obvious smell of marijuana even at a considerable distance.

Almost all of the sites have had extensive modifications to houses, garages, and outbuildings to support marijuana growing, including the installation of 300- or 400-amp commercial grade electricity service, consumer-owned utility poles, and multiple heat pumps.

Neighbors confirm that the houses frequently smell of marijuana and several times a year, a white van with New York or Massachusetts plates will arrive and depart. Neighbors also reported, in some cases, seeing tractor-trailer trucks delivering grow supplies.

The properties the Maine Wire has identified account for thousands of acres of land in rural Maine and tens of millions of dollars worth of real estate. Marijuana industry experts said a standard 2,500-square-foot house in Maine could, if properly renovated into a marijuana grow, generate \$1 million to \$3 million in marijuana per year.

Although most of the properties are owned under the names of Chinese men and women from New York or Massachusetts, some of them are owned through LLCs.

The Maine Wire was not able to independently confirm the immigration or citizenship status of the owners of these properties; however, nothing in U.S. or Maine law would prevent a Chinese national from purchasing a property in Maine, even if they were in the country illegally.

The Maine Wire has also discovered records tying multiple sites together, including car registrations, municipal waste permits, real estate records, and other public records, which, taken together, support the determination that the grow sites are connected and centrally controlled under an umbrella organization.

At a grow site in Fairfield, for example, there was a Toyota Corolla registered to the owner of a separate site in Garland. That same vehicle was later observed at the site in Garland.

At a different Fairfield site, there was a truck with Mass. plates that had a dump permit sticker for Dexter (40 miles East) and a dump sticker for Wilton (40 miles West).

Law enforcement sources confirmed that they are aware of the existence of multiple sites in both Dexter and Wilton.

Several of the properties that show obvious signs of active or recently active marijuana growing operations have been purchased by Chinese individuals from New York or Massachusetts only to be resold shortly after to other Chinese individuals from New York or Brooklyn.

#### *Indoor Marijuana Cultivation 101*

Before we get to the sites the Maine Wire identified, it will be helpful to go over some basics of growing marijuana indoors.

The chief necessity is abundant electricity. That electricity is used to power the grow lights, which consume substantially more energy than your average LED lighting.

But because those lights also generate a tremendous amount of heat, the grow rooms require cooling and ventilation equipment.

The ideal temperature for growing marijuana is 75–80 degrees Fahrenheit. Without significant air conditioning, the lighting would make a grow room too hot.

The primary way the sites in Maine cool their grow rooms and control humidity is through heat pumps.

The combined electricity consumption of the lighting and the heat pumps requires robust upgrades to electrical infrastructure at a typical residential property.

Most of the sites identified by the Maine Wire show evidence of recent electrical upgrades and the addition of multiple heat pumps.

Linesmen from Central Maine Power and local electricians both shared, on the condition of anonymity, stories about being asked to upgrade residential buildings with the power capacity typically only needed by energy-intensive businesses.

“Usually it’s like a 10 KVA transformer that they overload out of a, like a regular house. You won’t even be able to tell,” said a CMP Linesman. “And so we gotta go upgrade and usually one person will come out and stare at us the whole time. They usually don’t know any English.”

One electrician in central Maine was asked to install commercial grade service to a mobile home—a job he refused because he found the customers, who did not speak English, too sketchy.

“I met with them one time a couple years back but didn’t like what I was seeing,” the electrician said.

The two most common electrical upgrades encountered at these sites are new 300- or 400-amp breaker boxes and consumer-owned utility poles.

Without such upgrades, running a grow operation on common residential wiring risks starting a fire, as has happened at sites in Canaan, Winterport, and Vassalboro.

In addition to electricity, the indoor grow rooms need to seal out ambient light, which is why all of the windows are boarded up at these locations.

Ambient light during a dark-cycle can cause young marijuana plants to turn into hermaphrodites, which decreases the potency of the flower.

Here are some more in-depth looks at sites the Maine Wire has identified based on real estate records, photographs provided by sources, public records, and interviews with law enforcement and residents of the towns.

#### *629 Norridgewock Road, Fairfield*

This 4-bed, 2-bath house was purchased by 32-year-old Juan Lin on July 30, 2021, according to Somerset Registry of Deeds records.

The windows are obscured, not with curtains or blinds, but with a type of foil foam board used to keep out ambient light.

On the back of the house, there are three active heat pumps, two on the main house and one on the semi-detached garage.

The home also boasts an electrical entrance that far exceeds the standard residential electrical equipment.

In 2021, prior to Lin’s purchase, the home did not have any heat pumps or commercial grade electricity.

A master electrician licensed to work in Maine said the electrical equipment on the side of the home appeared to be a 400-amp service with two 200-amp manual disconnects—an expensive arrangement that is rare to install on a residential property.

In layman’s terms, the house is consuming far more energy than your average Maine home.

It also reeks of pot, according to neighbors.

Inside the home, photos show clear evidence of a marijuana growing operation. (Note: these were provided by a source who asked to remain anonymous.)

Legal Maine cultivators consulted by the Maine Wire assessed that this is what a standard grow operation looks like, noting the chemical containers, the newly installed benching on either side of the room, and and wiring.

This picture shows the same room prior to 2021.

At the time the more recent photos were taken, there were two vehicles on the property. A charcoal gray truck with Massachusetts license plates and a large white cargo van, also with Mass. plates.

According to public records, the only other address associated with Lin is in Quincy, Mass., where he appears to live with several family members.

Though Lin owns the property, there is no evidence that he has himself participated in the cultivation or trafficking of marijuana.

The Maine Wire has identified more than 100 similar sites in Maine that all fit many elements of the same pattern: (1) purchased in the past 3 years by a single Chinese man or woman from New York or Massachusetts; (2) strong odor of marijuana even from a distance of 100's of feet; (3) rubbish from commercial grow products; (4) massive upgrades to the electrical capacity of the property; (5) property has large garage, outbuilding, or barn; (6) all windows are completely blacked out; (7) multiple security cameras; and (8) multiple heat pumps running constantly.

#### *4 Smith Road & 43 Cape Cod Hill Road, New Sharon*

In New Sharon (population: 1,500), the Maine Wire identified two obvious marijuana grows purchased within the last 3 years.

A property at 4 Smith Road was purchased in July 2021 by Wen Bin Zhao, 34, of Brooklyn.

The house bears the tell-tale signs: all the windows boarded up, electrical upgrades, and, most tellingly, an overpowering odor of marijuana that could be easily detected from hundreds of feet away.

Similarly, this massive property at 43 Cape Cod Hill Road was purchased in June 2021 by Muhua Chen, 38, of Staten Island, N.Y.

During a visit in October, windows visible from the public road and the neighbors driveway appeared completely boarded up and the odor of marijuana was powerful (though that could have been because the site is about 200 yards from 5 Smith Road).

Although Chen and Zhao's names appear on the deeds of these properties, there is no evidence that they have themselves cultivated or trafficked illicit marijuana.

#### *Madison: Golf Course Road and Lakewood Road*

Madison is host to at least three active indoor marijuana growing operations. The operations are at 383 Lakewood Road, 288 Golf Course Road, and 21 Golf Course Road.

When the Maine Wire visited these three properties attempting to interview the occupants, we observed the tell-tale signs of marijuana grows—blacked out windows, electrical upgrades, multiple heat pumps, and the obvious odor of marijuana.

The 21 Golf Course Road is owned by Changju Wu and was previously owned by Joe Hao Liang, who also owns 383 Lakewood Road.

The house at 288 Golf Course Road was owned by Yanyi Wu, 30.

Wu, who previously lived in Brooklyn, purchased the property in Oct. 2020 and sold it this September to Jamie Yajing Chen, also previously from Brooklyn.

Wu is also the owner of a house in Embden. Although Wu obtained financing for the Embden location, the two Madison properties were purchased in cash.

Like the Fairfield location, the property at 383 Lakewood Rd. has undergone significant renovations since it was purchased.

Photos available on Zillow from before Wu acquired the property show it had no heat pumps installed on the front of the building.

While attempting to contact Wu at the house for an interview, the Maine Wire observed three heat pumps on the front of the building and one on the back. Comparing the before and after pictures also shows that the garage has had new power service installed within the past 3 years.

When the Maine Wire visited, every window was blacked out with sheet rock and blankets, and the smell of marijuana was apparent.

A roughly 5 minute drive from the Lakewood Road properties brings you to Golf Course Road.

At 288 Golf Course Road, the house smelled strongly marijuana when the Maine Wire attempted to contact the owner.

A vent on the side of the garage was pumping hot air that smelled strongly of marijuana.

Although a woman came out of the house to talk, conducting an interview was impossible because she only spoke Mandarin.

The occupant, a middle-aged Chinese woman, called an unidentified person who attempted to translate and conveyed that they were uninterested in talking.

The windows on the house and the garage were all boarded up with either foam insulation or sheetrock, and the home had commercial grade electrical service. The home also had multiple security cameras.

Like with other properties, before and after pictures show significant changes to the electrical equipment on the house following its purchase.

On the same road is another site that a neighbor described as a Chinese-owned marijuana growing operation.

The neighbor, who asked not to be named, said it was common knowledge on the road that the house was being used to grow marijuana. The aroma left little reason to doubt his opinion.

Comparing older pictures of the property to how it appears now shows significant modifications to the five car garage, including window covers to exclude ambient light.

#### *169 Baker Road, Winterport*

Fires are not uncommon at these sites.

This house in Winterport was purchased in August 2021 by Wanzhen Huang, 50, of Brooklyn, N.Y. The purchase price was \$182,000, and Zillow currently estimates it at \$348,900, but Zillow might not know about the unrepaired fire damage. This is how the home looks now.

A neighbor took this picture shortly after the Winterport house caught fire.

When the Maine Wire visited the home seeking an interview with the occupants, it appeared abandoned.

#### *346 Ohio Hill Road Rt 23, Fairfield*

This dilapidated Ohio Hill Road house was purchased by Yifeng Yu, 38, of El Monte, Calif., in February 2020. Images provided to the Maine Wire by a source who asked to remain anonymous show marijuana growing equipment littering the property, including plant pots, fertilizer containers, and soil supplements.

#### *195 West Road, Chesterville*

In Chesterville, the Maine Wire observed the strong odor of marijuana at this property.

A source, who asked to remain anonymous, said CBP has visited this property and even used a hidden camera to photograph it over a period of months.

A CBP agent declined to comment when asked about this property.

#### *Harming Legal Growers*

Legal marijuana cultivators told the Maine Wire that licensed operators have long believed that at least some weed grown illegally at sites controlled by Chinese organized crime is making into Maine's legal marijuana market.

The influx of cheap Chinese weed—which cannabis aficionados have dubbed “Triad Weed”—is, they believe, depressing prices.

“[Marijuana prices] went from \$2,800 during COVID and right before COVID,” said one medicinal grower. “Now, for a good pound of flower, it’s like \$1,250. So your profit on that after your CMP bill, your profit on that is like, you know, \$600.”

“All these little guys and all these caregivers that are doing the right thing are getting shut out and shutting down,” they said.

The plummeting price for legal cannabis in Maine coincides well with when Chinese buyers began scooping up rural Maine properties and converting them into grow operations.

#### *How Much Money Are These Sites Making?*

First off: How much marijuana could each site produce?

According to industry experts the Maine Wire consulted, the amount of marijuana produced at a given spot would depend on the skill of the growers, the resources at their disposal, and how much of the home and garage has been dedicated to grow rooms.

Assuming maximum efficiency, a 2,500 square-foot house could accommodate 50 grow lights, which would produce 100 pounds of processed marijuana per harvest. Such an operation could expect four to 12 harvests per year, or 400 to 1,200 pounds of marijuana flower.

How much is that in U.S. dollars? That depends on where the flower is ultimately sold. If the flower is sold into Maine's barely regulated medicinal market, it's almost certainly being sold for less than \$800 per pound. However, if the flower is being trafficked back to NYC, the black market price is closer to \$3,000 per pound.

Although there are a considerable range of factors, multiple individuals told the Maine Wire that it was realistic to conclude that an operation of this type could fetch \$1.2M to \$3.6M, not including the considerable costs of electricity, fertilizers, pesticides, fungicides, and, in some cases, mortgage payments.

This will be the first in a series of stories from the Maine Wire concerning Chinese organized crime in Maine.

Future articles in this series will focus on the financial arrangements that have allowed Chinese buyers to purchase so much real estate in Maine, the political response to this problem from Augusta, how the Office of Cannabis Policy understands the problem, and what steps law enforcement is taking.

Edward Tomic and Graham Pollard contributed to this report.

Ms. GREENE. Thank you, Mr. Chairman.

According to—I apologize. CBP encountered record numbers of Chinese nationals crossing the border under the previous Democrat administration. During the last 4 years there were over 170,000 Chinese nationals who were encountered nationwide, most of whom were caught crossing between the ports of entry. This does not include the potential Chinese nationals that are among the 2 million gotaways who completely evaded U.S. authorities are now—and now are roaming American communities. Open-border policies have consequences and America is paying the price.

In 2024 alone there were nearly 79,000 Chinese nationals encountered at the border. This is up from an average of only 1,500 a year over the previous decade. The majority of Chinese illegally entering the United States were single military-age men. One hundred seventy thousand people, Chinese nationals, is equivalent to more than 176 U.S. Army battalions. Or put it another way, they total more than 35 Army brigades or nearly 12 divisions or nearly 4 corps or 3 field armies. That is how we can translate that just for people's understanding.

According to the DEA, Chinese TCOs have become dominant in the U.S. illicit marijuana market, establishing highly sophisticated multi-State operations. In New Mexico, a recent Federal indictment exposed a 25-acre farm, 400-acre cultivation scheme on Navajo Nation lands tied to Chinese investors in recruited labor resulting in the seizure of more than 260,000 plants, 60,000 pounds of marijuana. The networks integrate profits from cannabis into fentanyl trafficking, human smuggling, and global money-laundering schemes creating significant national security challenges just as our witnesses have stated today.

The American people don't know about this. This is, you know, largely believed, especially in younger generations, that marijuana is a good thing, that it helps relieve stress, helps them sleep at night. Then there is also people that use it for PTSD and have success with it. There is medical uses of marijuana. But the American people have no idea that Chinese transnational criminal organizations are involved and that it is leading to other extremely terrible and dangerous crimes and fentanyl, honestly.

Director Anderson, how do these Chinese-backed illegal marijuana operations run? For the regular American, they are going, well, how is a crime organization from China able to run a marijuana farm?

Mr. ANDERSON. These are very, very sophisticated. When I say sophisticated, this is at a level that law enforcement across the Nation has never seen before because they are that sophisticated and that complex. They're layered and they're hidden under many,

many layers of LLCs and ownerships. When you begin to—for example, in Oklahoma, you may have a John Smith who is the owner, the 75 percent owner of the marijuana grove. As you dig through that thing, you'll find out that John Smith has never even been to the marijuana grove. John Smith was paid \$3,500 to put his name on a license because the Chinese national can't do that in the State of Oklahoma. That's how that happened in Oklahoma.

But these—you have people in Flushing, New York, and in California that run a lot of stuff across the whole United States that may not ever step foot in the State of Oklahoma other than to make a visit every once in a while. But these are very well organized, very sophisticated. It's not—whenever I talk about this, this is really a global thing that's going on with the Chinese nationals. If you look at what's going on down in Latin America, what the Chinese are doing down in Latin America, even to the Caribbean, they're building roads. I mean, they're really investing in stuff. But there's a reason why this is going on. Once again, this comes right back to the United States, to the national security and what's going on in—as well as to Oklahoma.

But you're right, I don't think the majority of the people in the United States realize what's going on. People in the marijuana industry really hate on me. They think I'm just against marijuana.

Ms. GREENE. Right.

Mr. ANDERSON. I'm not—it hasn't—for me it has nothing to do with marijuana. If someone wants to ingest marijuana, that's their business. For me, it has everything to do with the transnational criminal organizations who are doing things such as trafficking in very large amounts of marijuana. They are laundering billions, not millions. Oklahoma is probably over 100—well over \$100 billion just for Oklahoma. The murders, the sex trafficking, which is probably one of the most deplorable things that we have to deal with. How we treat other humans like this, I just don't get it. But the rest of the United States probably don't know really what's going on.

It's not just Oklahoma. Yes, Oklahoma is kind-of the epicenter of kind-of what's going on right now because we do have such a liberal marijuana law. But the sex trafficking, the violent crimes, the underground casinos, the underground banking is going on all across the United States.

Ms. GREENE. Wow. Thank you. I am sorry, I am out of time. Mr. Chairman, we need to explore how we can help some State and Federal work together to trace the money and track this down. Thank you.

Chairman BRECHEEN. The gentlelady yields.

I now recognize Mrs. Ramirez for her 5 minutes of questioning.

Mrs. RAMIREZ. Thank you, Chair and Ranking Member. Before we get started, Chairman, I want to ask unanimous consent to include into the record, "Children of Couple Taken by ICE in Cicero Road Stop Speak out," and, "What Happened to Silverio Villegas Gonzalez."

Chairman BRECHEEN. So sorry.

Mrs. RAMIREZ. I can do it again.

Chairman BRECHEEN. Without objection, so ordered.

## ARTICLES SUBMITTED BY HON. DELIA C. RAMIREZ

'HEARTBROKEN AND DEVASTATED,' CHILDREN OF CICERO COUPLE ARRESTED BY ICE IN TRAFFIC STOP ASK FOR THEIR RELEASE

By Adriana Pérez / [adperez@chicagotribune.com](mailto:adperez@chicagotribune.com) / *Chicago Tribune*

PUBLISHED: September 17, 2025 at 10:53 AM CDT

<https://www.chicagotribune.com/2025/09/17/heartbroken-and-devastated-children-of-couple-arrested-by-ice-in-cicero-traffic-stop-ask-for-their-release/>

On their youngest son's 10th birthday, Federal immigration agents detained a couple who immigrated from Mexico and have lived in Cicero for 18 years, family and lawyers said Tuesday.

U.S. Immigration and Customs Enforcement agents arrested Moises Enciso Trejo, 41, and Constantina Ramirez Meraz, 43, during a traffic stop Sunday at Cicero Avenue and Pershing Road on the Chicago-Cicero border. They had been driving with one of their four children, their eldest son, to his university to drop off school materials and later meet the rest of the family in church.

"The children are heartbroken and devastated by these arrests," said Shelby Vcelka, managing partner at Victory Law Office, which is representing the Enciso-Ramirez family. "They are deeply concerned about the well-being of their parents and want them to come home."

The son, 22, was also detained but released 2 hours later, according to Vcelka. Citizenship requests for the eldest son and a daughter, 19, under the Deferred Action for Childhood Arrivals program are currently pending approval, the family said.

A spokesperson for ICE did not confirm when the couple would be deported, citing "operational security."

"What we can tell you though is that both are in the country illegally, in violation of Federal immigration law and are expected to remain in ICE custody, pending immigration proceedings," the spokesperson said Wednesday.

Viral videos shared on social media showed the daughter and two underage siblings—both U.S. citizens, according to the family—on the scene as well. Lawyers later clarified that the three of them had not been in the vehicle at the time of the traffic stop, but rather showed up shortly afterward when they received a call with "the unthinkable news" about the arrests, Vcelka said.

According to a family statement, the ICE agents pressured the younger siblings, 12 and 10, with questions and, without verifying her age, they handed the car keys to the older sister, leaving her and the children with two abandoned vehicles on the side of the road.

"Their 10-year-old son watched helplessly as his parents were taken away on his birthday—a day meant for joy, not fear," the statement reads. "Moises Enciso and Constantina Ramirez do not have a criminal background. They are beloved parents and valuable members of the community."

A search of court records for Cook and collar counties did not turn up any criminal history for anyone with matching birthdays named Enciso Trejo and Ramirez Meraz.

Family said that Ramirez, the mother, works at a local restaurant, and that Enciso, the father, is a construction worker known to be friendly and outgoing among neighbors. He was anxiously waiting to reunite with his mother, who was going to visit from Mexico for the first time in two decades, this coming Sunday—plans that, like his son's birthday celebration, were also put on hold when Enciso was taken into custody.

"The uncertainty and fear of not knowing when their parents will be released has been agonizing," the family statement said.

According to lawyers, the children are currently under the care of relatives.

"Our office will pursue every available option to fight for Moises and Constantina's release and to protect their rights under the law," Vcelka said.

*Chicago Tribune's Caroline Kubzansky contributed.*

## WHAT HAPPENED TO SILVERIO VILLEGAS GONZÁLEZ

*An immigration agent shot and killed an unarmed 38-year-old father outside Chicago on Friday—and their initial narrative of events was quickly disproven by videos captured by witnesses.*

*by Steve Held, Raven Geary, Dave Byrnes, and Shawn Mulcahy*

*September 15, 2025*

*<https://chicagoreader.com/news/ice-shooting-silverio-villegas-gonzalez-franklin-park/>*

Less than 1 week into President Donald Trump’s surge of deportation arrests in Chicago, an immigration agent shot and killed a man during a traffic stop on a near suburban street Friday morning.

The Department of Homeland Security (DHS) identified the man as Silverio Villegas González, confirmed by the Mexican consulate as a 38-year-old Mexican citizen from the state of Michoacán. An unidentified Immigration and Customs Enforcement (ICE) agent fatally shot him in the heavily Latine Chicago suburb of Franklin Park during what DHS described as a “vehicle stop,” according to an official statement.

The statement, which was immediately quoted by media outlets, places much of the blame on Villegas González for his own death. The agency also claimed Villegas González drove his car at ICE agents conducting the vehicle stop, resulting in serious injuries.

“He refused to follow law enforcements [sic] commands and drove his car at law enforcement officers,” the statement reads. “One of the ICE officers was hit by the car and dragged a significant distance. Fearing for his own life, the officer fired his weapon.”

Bystander videos and eyewitness accounts, however, tell a different story.

Security footage near the scene in Franklin Park, as reported by CBS News, shows two plainclothes agents approaching a silver sedan that had been blocked from moving by an unmarked SUV. The sedan eventually reverses away from the two agents, and the officer on the passenger side points his firearm at the vehicle.

As Villegas González drives away from the agents—not toward them, as DHS claimed—the agent on the passenger side aims his weapon at the back of Villegas González’s car. Two gunshots can be heard in a separate security video. The second agent is not visible during the shooting, and it remains unclear which agent fired their weapon.

Other footage that circulated on social media following the shooting, recorded by on-scene witnesses, shows two men in body armor pulling Villegas González out of his vehicle after it crashed into the undercarriage of a semi truck about 100 feet away from the initial traffic stop.

The pair of agents, who appear to be operating alone, are then seen laying Villegas González’s bloodied body on the ground and providing first aid. One can be heard yelling for bystanders to call 9–1–1. Neither appears seriously injured.

“He got blood . . . all over his neck and his head,” said a local witness, who asked not to be identified, of Villegas González’s condition when an ambulance arrived. The witness emerged from her apartment building to see plainclothes agents in body armor with no agency lettering wrapping Villegas González’s gunshot wounds in gauze.

Villegas González was pronounced dead after being taken to the nearby Loyola University Medical Center, according to a Friday evening statement from the Village of Franklin Park.

DHS reports the allegedly injured officer is in stable condition.

Witness video obtained by Unraveled appears to show no other agents present in the immediate aftermath of the shooting.

A search of Cook County court records shows the beloved father and community member was cited for four minor vehicle violations between 2010 and 2019. Just one involved a moving violation—speeding—more than 12 years ago in May 2013.

Verified ICE sightings around the greater Chicago area in the last week already show a pattern of traffic stops that have led to immigration enforcement arrests. A mix of plainclothes agents and members of the Chicago field office’s special response team (SRT), in fully militarized gear, have been spotted pulling over drivers.

This so-called “jump out” maneuver has been used for years by the Chicago Police Department’s tactical teams. Police departments in urban areas will often use an unmarked SUV to quickly cut off a target vehicle in traffic, as plainclothes officers jump out and bark orders at the vehicle’s occupants. The tactic is predominantly

used to stop Black and Latine drivers, and the stops cause confusion and panic for drivers boxed in their cars, frequently leading to violent police encounters.

A similar maneuver led to the death of Dexter Reed in Chicago in March 2024. Officers involved in Reed's death have since received suspensions for violating multiple department policies in how they conducted traffic stops.

ICE agents are rarely seen wearing body cameras, and municipal police department policies do not apply to any of their law enforcement activities. Likewise, Federal agencies are not mandated to identify agents who fire their service weapon. There is no set time frame in which they have to release relevant records via the Freedom of Information Act, and no policy Unraveled is aware of mandates time off-duty for Federal agents involved in a shooting.

Agents with the Federal Bureau of Investigation (FBI) were seen processing the crime scene. As of press time, it remains unclear if the Illinois State Police or any other local law enforcement will be involved in the investigation into the incident.

There is a short history of State police investigating fatal shootings by Federal agents—in 2024, the Arkansas State Police investigated the shooting death of a local official by agents with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and in 2021, the Connecticut State Police investigated a shooting involving an FBI agent. Prosecutors declined to prosecute either case.

The incident has sparked uproar in the community amid the Trump administration's targeting of Chicago for heightened immigration enforcement.

"This blood that was spilled today will be a stain on the history of our Nation," said Illinois State senator Karina Villa of Villegas González's killing at a press conference on Friday afternoon.

#### *Community remains defiant*

Also on Friday, only a few miles south of where Villegas González was killed, protesters demonstrated for more than 12 hours outside an ICE processing facility in the suburb of Broadview.

The demonstration overlapped with a long-running weekly prayer service for migrants detained inside the facility.

Protesters, armed with handmade signs and sidewalk chalk, repeatedly confronted heavily armored Federal agents in face coverings as the agents moved vehicles in and out of the facility over the course of the day. These included a transit van with captives banging from the inside.

According to a September 2 statement from Broadview mayor Katrina Thompson, ICE will continue operating out of the Broadview facility as part of a "large-scale enforcement campaign"—part of the Trump administration's so-called Operation Midway Blitz—until at least mid-October.

Immigration rights organizations are unable to provide an accurate estimate of the number of people snatched by Federal agents over the last several days, surely in part due to the chaotic and dispersed nature of the ICE operation.

"I don't have a sense of a number except to say that it is certainly higher than what ICE is reporting publicly," said a spokesperson for the Illinois Coalition for Immigrant and Refugee Rights in a statement. "We know ICE's history of exploiting personal tragedies to conduct broad and unnecessary operations with increasingly aggressive, and now fatal, tactics. We also know that our partners have conducted legal intake for individuals who are not among those on DHS's press release from earlier this week, and that abductions are still happening into the weekend."

Before dawn, protesters blocked the main vehicle entrance to the ICE facility. Agents shifted to using a separate garage attached to the building after sunrise, repeatedly sending out teams to guard vehicle transfers. Local police from Broadview and Maywood, who were also on scene, joined with the agents' line on at least one occasion, and at other times formed a loose line in front of the facility itself.

At multiple points over the course of the day, agents took to the facility's roof, some armed with long guns and others seemingly recording the crowd with smartphones. One agent also appeared to be piloting a drone over the crowd around 10:30 AM.

Video captured by witnesses shows the agents becoming more aggressive as the day wore on and the crowd thinned.

Hours after an ICE agent fatally shot Villegas González in Franklin Park, SRT agents deployed projectile chemical munitions on the crowd. These included chemical gas, as well as pepper balls fired at a protester who was using a mobility aid.

"They are hurting families, and they need to stop," said one protester at the Broadview facility, who asked not to be named, of the immigration agents' activity in the Chicago area. "We don't want them in Chicago. We don't want them here in the United States."

*Editor's note (9/16/25, 3:30 PM): Official communications immediately following Silverio Villegas González's killing incorrectly identified him as Silverio Villegas-Gonzalez. This story has been updated to reflect the correct spelling.*

Mrs. RAMIREZ. Thank you, Chairman.

This is our oversight committee, and I think it is important to use every opportunity here to do the oversight work. I want to thank the panelists that are here, but I need to talk about what is happening here, right now, all over the country. I want to start by saying that the Department of Homeland Security is a national security threat. I call it a force terrorizing communities with good reason. Men in masks, unmarked cars, no badges, no body cameras, and arrests without valid warrants all result in fear, chaos, and harm.

Given that this is a subcommittee on oversight, I want to show 2 clips today. One clip shows DHS agents engaging children whose family members were just abducted. The second clip you are going to see today shows the murder of Silverio Villegas Gonzalez by DHS agents. Let's watch the footage.

[Videos shown.]

Mrs. RAMIREZ. Shot. Let's break it down. In the first video, ICE says the lie. ICE encountered a mother and her 2 children who weren't detained and then kept asking, are they citizens? If you have a warrant, if you know that they are not citizens, why are you asking if they are citizens? Here is the facts: ICE detained a mother, a father, and their son, a college student, that is a dreamer. They encountered the couple's 3 other children and aggressively questioned a 12- and 10-year-old. Given that we know that the parents had no public criminal record, how did DHS agents know to pull them over? We know. It is because they are Brown.

I cannot imagine a parent in this room who would accept their children being questioned without an adult. If any of my colleagues are at peace with watching that little girl cry, you know what? Miss me with your family values.

In the second video, the lie? That ICE statement, he dragged an ICE officer. The footage, the fact? No one was dragged. The lie? He drove at agents. The fact? He drove away from agents. The lie? Used appropriate force. The fact? The agent shot Silverio dead. The lie? Silverio had a history of reckless driving. Are the cameras not on? The camera should be on. I mean, I know we are filming. The fact is, he had just one moving violation in May 2023. A traffic violation should never amount to a death sentence. We need a full and thorough investigation into what happened.

One moment. Is the public seeing this, Chairman? Chairman, is the public seeing this? Are the cameras on? OK. If you can go ahead and return my time. I think I was at about 30 seconds when I asked about the camera. I will wait. If it is OK, Chairman, I'll finish my 30 seconds in here.

Chairman BRECHEEN. The gentlelady will hurry.

Mrs. RAMIREZ. I want you to look at that face. Silverio was shot. He was the father with full custody of these 2 children. He was shot after he was followed dropping off his child at daycare. We need a full, thorough investigation and every single death and separation, every orphan created is Kristi Noem's responsibility. It is

why, Mr. Chair, pursuant to clause 2(k)(6) of rule XI(1), I move that the committee subpoena Secretary Kristi Noem.

Chairman BRECHEEN. I now recognize Representative Strong for his—

Mrs. RAMIREZ. Mr. Chairman, I—

Mr. STRONG. Thank you, Chairman Brecheen, for holding these hearings today. I have already seen how this—

Mrs. RAMIREZ. Mr. Chairman, I need a response to my request of a subpoena. I didn't get a response.

Chairman BRECHEEN. The gentlelady will state her motion again.

Mrs. RAMIREZ. Mr. Chair, pursuant to clause 2(k)(6) of rule XI, I move that the committee subpoena Secretary Kristi Noem.

Chairman BRECHEEN. All right. The committee will stand in recess.

[Recess.]

Chairman BRECHEEN. All right. The committee will be in order resuming.

The gentlelady had a motion on the table.

Mr. STRONG. Mr. Chairman, motion to table.

Chairman BRECHEEN. The gentleman has now indicated his desire to table that motion.

Ms. GREENE. I second.

Chairman BRECHEEN. The gentlelady has seconded.

All those in favor of tabling the motion, signify by saying aye.

All opposed?

The ayes have it.

Mrs. RAMIREZ. Mr. Chairman, I request a recorded vote.

Chairman BRECHEEN. A recorded vote is requested. The Clerk will call the roll.

The CLERK. Ms. Greene.

Ms. GREENE. Aye.

The CLERK. Ms. Greene votes aye.

Mr. Strong.

Mr. STRONG. Aye.

The CLERK. Mr. Strong votes aye.

Mr. Ogles.

Mr. OGLES. Aye.

The CLERK. Mr. Ogles votes aye.

Mr. Knott.

Mr. KNOTT. Aye.

The CLERK. Mr. Knott votes aye.

Mr. Garbarino.

[No response.]

The CLERK. Mr. Thanedar.

Mr. THANEDAR. No.

The CLERK. Mr. Thanedar votes no.

Mrs. Ramirez.

Mrs. RAMIREZ. No.

The CLERK. Mrs. Ramirez votes no.

Mr. Carter.

[No response.]

Chairman BRECHEEN. How is the Chairman recorded?

The CLERK. The Chairman has not yet been recorded.

Chairman BRECHEEN. The Chairman votes aye.

The CLERK. Chairman Brecheen votes aye.

Mr. CARTER. Mr. Chair, how am I recorded?

The CLERK. Mr. Carter is not recorded.

Mr. CARTER. Mr. Carter votes no.

The CLERK. Mr. Carter votes no.

Mr. Green of Texas.

[No response.]

The CLERK. Ranking Member Thompson.

[No response.]

Chairman BRECHEEN. Any other Members not voted?

The Clerk will report.

The CLERK. Mr. Chairman, on that vote, there were 5 ayes and 3 noes.

Chairman BRECHEEN. The ayes have it. The motion to table is adopted.

All right. We are back on the agenda. I now recognize the gentleman from Alabama for his 5 minutes of questioning.

Mr. STRONG. Thank you, Chairman Brecheen, for holding this hearing today.

We have already seen how the CCP took advantage of the open-border policies of the previous administration to provide precursors to fentanyl that have wreaked havoc all over this Nation and all over the world in an effort to kill a generation of Americans, not Republicans, not Democrats, but Americans. The Mexican cartel cannot make fentanyl without the precursor from China. These illegal marijuana farms are another example of how brazen the CCP will be. Earlier this week, we talked about how foreign adversaries see U.S. agriculture not only as an economic target, but also a homeland security vulnerability.

Mr. Larkin, how significant is land acquisition to the broader strategy of Chinese criminal groups operating in America?

Mr. LARKIN. It's helpful to them in 2 very different ways. First, it allows them to use the property to grow illicit drugs, to process them, and then use that site as a distribution point. But it's also possible to do that in places that would allow them to try to use that area for spying on nearby facilities. For example, if you had an indoor rather than an outdoor grow, you could not only use that as a basis for developing marijuana that you can then ship elsewhere in the State or across the Nation, you can also use that as a place perhaps for spying on nearby Americans or American bases or other sensitive targets. So it's a very dangerous sort of circumstance we have.

Mr. STRONG. I think you are exactly right. You start thinking about it, I asked the State Department, how many acres does China own or lease in America sometime back, might have been a year or 2. I remember they said, we will get back with you. Then all of a sudden we found out 380,000 acres are either owned or leased by China of American soil.

Then we peeled the onion back a little further. What did it say? We found out that where is this property located? It is around our largest military installations in America. What is unbelievable, we actually got a bipartisan bill, had Democrats that crossed over because they know that this is a threat to America.

When your agents do uncover these foreign back-grow operations, what obstacles do you face in proving the criminal ties and actually shutting them down?

Mr. LARKIN. Is that still to me?

Mr. STRONG. Yes, sir.

Mr. LARKIN. The problem is Federal law doesn't require in detail identification of all the different organizations, entities, companies, or people that have an interest in particular property. You can obscure it in that way. One way this Congress could address this problem is by making clear that you have to identify any and all foreign nationals, particularly Chinese foreign nationals, who are potentially associated with the PRC or the CCP as being real parties of interest in either acquisitions of property by purchase or by leasing. So that you can then with the onus on the people who are the property owners as well as the real estate people to make them help the Federal Government identify when the PRC and the CCP is involved.

Mr. THANEDAR. Thank you, Mr. Larkin.

Our national security strategy says China is the only country with both the intent and the ability to reshape the international order. It also calls China the Pentagon's top challenge. While our military has been focused on China for some time, do you think other departments like DHS need to increase their focus on China's influence here at home?

Mr. LARKIN. I do. I think one of the problems is the American public doesn't understand the role that China plays in the illicit drug trafficking and other activities that are damaging to the Nation.

Mr. STRONG. Thank you.

Mr. Urben, you have spent years investigating transnational money-laundering networks. How significant a threat are Chinese networks to our financial system compared to other global actors?

Mr. URBEN. Chinese money launderers, their networks over the last 7 years, they've become the dominant money launderers for transnational organized crime around the world. They are the primary launderers for the Mexican drug cartels. For example, when they became the dominant money launderers 2017, 2018, or 2019, they increased the net profits of the Mexican cartels, the designated terrorist organizations, by our estimation of 3 to 5 percent of their bottom line.

The way to attack those networks is with high-level prosecutions against command and control. FinCEN several weeks ago came out with additional guidance on compliance, AML, red flag, in terms of Chinese money laundering within the United States. We need to attack it with significant authorities and funding.

Mr. STRONG. If you could recommend one Federal action that would immediately disrupt Chinese TCO operations in the United States, what would that be and why?

Chairman BRECHEEN. Quickly.

Mr. URBEN. Proper funding and authority and mandate for the Federal Government through a task force to go after those networks aggressively in the next year with racketeering-type charges.

Mr. STRONG. Thank you. Mr. Chairman, I yield back.

Chairman BRECHEEN. The gentleman yields.

I now recognize Representative Carter for his 5 minutes of question.

Mr. CARTER. Thank you, Mr. Chairman. Thank you to our witnesses for being here.

For decades, the Federal Government's decision to criminalize marijuana has been nothing short of disastrous for our communities, for our economy, and for justice in America. The failed war against cannabis has especially devastated Black and Brown communities. Arrest and incarceration rates for marijuana offenses have been wildly disproportionate, with people of color far more likely to be targeted despite using marijuana at similar rates as white Americans. These policies have fueled mass incarceration, separating families, stripping people of opportunities, and saddling them with criminal records that create life-long barriers to housing, education, and employment. This has entrenched cycles of poverty and inequality, all in the name of a policy that the American people increasingly reject.

Beyond the human costs, prohibition has created a lucrative illicit market. By outlawing marijuana, rather than regulating it, the Federal Government allowed billions of dollars to flow through the underground economy. That money could have gone toward tax revenue, community investments, and public health, but instead it has enriched criminal enterprise and fueled violence.

Today, with most Americans supporting legalization, it is past time that we acknowledge the truth: marijuana prohibition has failed. The regulated cannabis industry is not the same as what we were discussing today. The state of legal cannabis industry employs over 425,000 people and operate in 40 States, including my home State of Louisiana. State-regulated cannabis programs require rigorous product testing for contaminants, pesticides and alterants, and potency, sometimes entirely absent from the illicit marketplace.

Mr. Chairman, I would like to enter into the record this letter from the United States Cannabis Roundtable, the advocacy organization for the regulated State-licensed cannabis industry. This letter includes more details about how legalization can combat foreign criminal cartels.

Chairman BRECHEEN. Without objection, so ordered.

LETTER FROM THE US CANNABIS ROUNDTABLE

*September 18, 2025.*

The Honorable JOSH BRECHEEN,  
*Homeland Security Committee, Subcommittee on Oversight, Investigations, and Accountability, 310 Cannon House Office Building, Washington, DC 20510.*

The Honorable SHRI THANEDAR,  
*Homeland Security Committee, Subcommittee on Oversight, Investigations, and Accountability, 310 Cannon House Office Building, Washington, DC 20510.*

*Re: Statement for the Record on the Subcommittee on Oversight, Investigations, and Accountability will hold a hearing titled, "Invasion of the Homeland: How China is Using Illegal Marijuana to Build a Criminal Network Across America."*

DEAR CHAIRMAN BRECHEEN AND RANKING MEMBER THANEDAR: The United States Cannabis Roundtable ("USCR") appreciates the opportunity to submit this statement for the record for the hearing entitled "Invasion of the Homeland: How China is Using Illegal Marijuana to Build a Criminal Network Across America." USCR is the voice of America's regulated and State-licensed cannabis industry. Our members include the nation's leading cannabis operators and ancillary businesses and operate

in all 40 States where cannabis is legal for medical use, and the 24 States where cannabis is legal for adults over the age of 21 without medical supervision. USCR strongly supports efforts to combat the illicit cultivation of and diversion of marijuana, and we are grateful to the committee for holding a hearing on this important issue.

Over the past several years, we have seen that foreign criminal enterprises have infiltrated States like California, Maine and Oklahoma,<sup>1</sup> diverting products to where cannabis remains illegal and subverting strict State regulations on public health and safety. According to the DEA's 2025 National Drug Threat Assessment, Chinese and Mexican transnational criminal organizations are associated with violence, have committed serious immigration and labor violations and have engaged in human-trafficking in addition to failing to comply with State regulations.<sup>2</sup> There is no doubt that additional enforcement is needed.

The State-licensed cannabis industry takes regulation, product track and trace, age-gating and public safety seriously, and our members follow State laws and work well with our regulators to provide medical and adult-use products safely within the framework of State-regulated programs.

Our industry employs 425,000 full-time equivalent individuals and has paid over \$24.7 billion dollars in State taxes.<sup>3</sup> <sup>4</sup> Because of strict age-gating and our adherence to State marketing restrictions, States that have legalized cannabis have actually seen a decrease in adolescent use.<sup>5</sup>

In each State that our member companies operate, strict regulations dictate permissible conduct for cannabis businesses. This includes the seed to sale tracking, which creates a detailed record of the regulated cannabis supply chain,<sup>6</sup> age-gating and ID checks, plain package that does not appeal to children, and product testing to ensure that cannabis products are free from contaminants, mold, pesticides, and other adulterants that could be harmful to consumer health and safety.<sup>7</sup> Of course, cartels and criminal organizations by their very nature adhere to none of these safeguards, and they undermine State-legal markets, and State tax revenue, while selling dangerous, oftentimes tainted products.

Currently, the Trump administration is considering reclassifying cannabis from a Schedule I to a Schedule III drug. USCR strongly supports this decision as it will further help combat against the influence of cartels and criminal enterprises. Rescheduling cannabis could reduce cartel revenue by \$1 to \$2 billion dollars annually.<sup>8</sup> Rescheduling cannabis also creates greater financial transparency, and allows for better prioritization of Federal enforcement dollars. Rescheduling, however, would not hinder law enforcement's ability to prosecute illegal actors, nor does it change the legal status of State-licensed businesses.

During President Trump's first term, he recognized the role the illicit market plays in fulfilling demand for substances by saying, "If you don't give it to them, it's going to come here illegally."<sup>9</sup> Since States have begun to legalize cannabis, seizures of the plant at our Nation's Southern Border have greatly decreased. Border Patrol confiscated 78 percent less cannabis in 2018 than they did in 2013 largely because of wider availability of cannabis in the U.S. from legal sources.<sup>10</sup> In 2019, former Mexican President Vicente Fox acknowledged that the best way to combat the presence of cartels in Mexico was to legalize cannabis.<sup>11</sup>

Thank you again for organizing this hearing, and USCR stands ready to be a cooperative partner in the effort to eradicate illicit cannabis cultivation across the

<sup>1</sup> <https://www.newsnationnow.com/us-news/immigration/border-coverage/chinese-mexican-crime-rings-marijuana/>.

<sup>2</sup> [https://www.dea.gov/sites/default/files/2025\\_05/2025%20National%20Drug%20Threat%20Assessment\\_Web%205-12-2025.pdf](https://www.dea.gov/sites/default/files/2025_05/2025%20National%20Drug%20Threat%20Assessment_Web%205-12-2025.pdf).

<sup>3</sup> <https://www.nsc.org/cannabis-regulations?srsltid=AfmBOopbc5LiBKBHiRcrW4-Yh8Gik-GYGP2pNss00sZLTClJtYhRd0Y2>.

<sup>4</sup> <https://www.forbes.com/sites/javierhasse/2025/06/22/legal-weed-is-working-data-suggests-24-7-billion-in-taxes-teen-use-down-in-most-states/#>.

<sup>5</sup> <https://www.mpp.org/issues/legalization/adult-use-legalization-corresponds-with-drop-in-teen-marijuana-use>.

<sup>6</sup> <https://reason.org/commentary/batch-tracking-the-next-wave-of-marijuana-tracking-systems/>.

<sup>7</sup> <https://www.nsc.org/cannabis-regulations?srsltid=AfmBOopbc5LiBKBHiRcrW4-Yh8Gik-GYGP2pNss00sZLTClJtYhRd0Y2>.

<sup>8</sup> [https://www.rand.org/pubs/occasional\\_papers/OP325.html](https://www.rand.org/pubs/occasional_papers/OP325.html).

<sup>9</sup> <https://trumpwhitehouse.archives.gov/briefings-statements/remarks-president-trump-listening-session-youth-vaping-electronic-cigarette-epidemic>.

<sup>10</sup> <https://www.cato.org/sites/cato.org/files/pubs/pdf/pa-860-revised.pdf>.

<sup>11</sup> <https://www.cbc.com/2019/10/22/vicente-fox-legalizing-drugs-is-the-way-to-combat-cartels.html>.

country. Please do not hesitate to reach out with any questions you may have via our website at [www.uscr.org](http://www.uscr.org).

Sincerely,

THE UNITED STATES CANNABIS ROUNDTABLE.

Mr. CARTER. The real choice isn't cannabis or no cannabis? It is whether we let foreign criminal networks run the show or rather we empower regulated American businesses that test, track, and play by the rules. If we want to dismantle foreign criminal networks and protect American communities, then we need to strengthen, not weaken, regulated markets. That means financial transparency, clear rules, and a Federal framework that allows law enforcement to focus on fentanyl and other real threats to our community.

Mr. Larkin, in a recent report from the Heritage Foundation, you have recommended against rescheduling cannabis, but even President Trump has expressed support for rescheduling. Like President Trump, I believe we should end endless arrests for cannabis conduct and focus on the real bad guys, those who are pushing fentanyl and other deadly forms of drugs. Why do you oppose President Trump's support for rescheduling, especially since that means we can both recognize medical uses and better-aligned law enforcement priorities?

Mr. LARKIN. It would be a mistake legally, medically, and from a policy perspective to reschedule cannabis from 1 to 3. It would also be a mistake, even more so, to legalize it. I wrote in an article in the *Journal of the American Medical Association Psychiatry* multiple reasons why legally, medically, and policy-wise, the rescheduling would be a mistake.

Mr. CARTER. Mr. Larkin, have you expressed—

Mr. LARKIN. I can give you one in particular.

Mr. CARTER. Just a second. Have you expressed your concern with the Trump administration?

Mr. LARKIN. I published it in the *Journal of the American Medical Association*. That's the way think tanks do things. I haven't talked to anybody in the Trump administration. But I can tell you one thing that is absolutely true. For 80-plus years, the United States has trusted the Food and Drug Administration with the responsibility to decide what is a drug and what whether it's safe and effective.

Mr. CARTER. I am going to reclaim my time because I only got 25 seconds. You argue in your testimony that State legalization has not eliminated the illicit black market. But isn't it true that we have legalized cannabis in most of our States? It remains illegal at the Federal level, which is why, despite paying millions of dollars in taxpayer dollars, licensed operators are often shut out of traditional banking services and are forced to operate in cash. When a legitimate operator is shut out of banking, it makes it harder for law enforcement to trace transactions, determine who is compliant and who is not. Wouldn't law enforcement and public safety be better served by a Federally-regulated system to track the flow of marijuana businesses' processing and distribution, thus making it clear who the real operators are versus the Chinese, who are inundating our communities with marijuana that may, in fact, be tainted?

Mr. LARKIN. No. The Chinese will also take advantage of any legally sellable cannabis product. They make money not only from illicit sales, but from lawful sales. They actually try to focus on States that have medical or recreational programs so that they can have lawful sales, big outdoor grows and the like. Ask my colleague from Oklahoma.

Mr. CARTER. The Chairman has been very generous. My time is up, but I will ask you a final question as I part. Is it your assertion that all marijuana should be illegal?

Chairman BRECHEEN. Hurry, please.

Mr. CARTER. Is it your assertion that all cannabis should be illegal, medicinal, and/or recreational?

Mr. LARKIN. Yes, because the Food and Drug Administration—

Mr. CARTER. Just yes or no.

Mr. LARKIN. No, the Food and Drug Administration—

Mr. CARTER. No, I reclaim my time, sir.

Chairman BRECHEEN. The gentleman's time has expired.

I now recognize Representative Ogles for his 5 minutes of questioning.

Mr. OGLES. Thank you, Mr. Chairman. I ask unanimous consent to submit for the record Resolution Number 25109 from Siskiyou County, California Board of Supervisors, requesting that Governor Newsom of California proclaim a state of emergency regarding illegal pesticides and illicit cannabis operations.

Chairman BRECHEEN. So ordered.

RESOLUTION NO. 25-109

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SISKIYOU  
PROCLAIMING A LOCAL EMERGENCY  
AND  
REQUESTING THE GOVERNOR TO PROCLAIM A STATE OF EMERGENCY  
REGARDING ILLEGAL PESTICIDES AND ILLICIT CANNABIS OPERATIONS

**WHEREAS**, California Government Code section 8630 empowers the Board of Supervisors ("Board") to proclaim the existence of a local emergency when Siskiyou County is threatened or likely to be threatened by conditions of extreme peril to the safety of persons and property that are or are likely to be beyond the control of the services, personnel, equipment, and facilities of this County; and,

**WHEREAS**, the illegal importation and distribution of foreign-manufactured pesticides circumvent federal and state regulatory oversight and constitute a transnational criminal threat; and,

**WHEREAS**, conditions of extreme peril to the health and safety of the public, first responders, property, and the environment have arisen in Siskiyou County due to the widespread presence of illegal pesticides related to illicit cannabis cultivation and processing operations; and,

**WHEREAS**, illegal cannabis cultivators in Siskiyou County are increasingly using illegal, highly toxic pesticides unlawfully as fumigants by igniting sawdust-like materials infused with a cocktail of insecticides (organophosphates, carbamates, pyrethroids, chlorinated hydrocarbons), fungicides, and herbicides in aluminum cans placed throughout enclosed grows structures, creating thick, poisonous smoke; and,

**WHEREAS**, multiple certified laboratories have identified the presence of at least twenty-seven pesticides in various mixtures saturated in the sawdust-like materials of which nine behave similar to chemical warfare nerve agents by attacking the central nervous system (i.e., acetylcholinesterase inhibitors), three are listed as California Toxic Air Contaminants; six are listed by California state agencies as groundwater pollutants; and nine are listed as California Proposition 65 carcinogens; and,

**WHEREAS**, since 2023, approximately 176 investigations conducted by the County's Code Enforcement and Environmental Health divisions, and associated enforcement actions, have revealed the widespread blatant misuse of highly toxic Chinese-labeled pesticides, as well as other less frequently observed Thai-labeled and Spanish-labeled pesticide products (see Exhibit A). According to the California Environmental Protection Agency (CalEPA), the Chinese-labeled pesticide fumigant

products have been found in eighteen counties throughout California with Siskiyou County taking the lead on quantity, variety, and frequency of observation. These illicit products are often imported outside of legal regulatory channels and lack English-language label information required under federal and state law; and,

**WHEREAS**, these illegal pesticide fumigant products have been routinely discovered at illegal cannabis cultivation sites and include pesticides that have never been approved for use in the United States, such as chlothiophos, diafenthiuron, fenobucarb, fluberidazole, isoprocarb, procymidone, and tridemorph, along with other pesticides that were once approved for use but cancelled due to health and safety concerns, such as dinoseb and hexachlorobenzene. Additionally, according to CalEPA, it is unknown at this time what thermal decomposition products (i.e., toxic gases) are produced by burning a mixture of highly toxic and illegal pesticides that are not permitted to be used as fumigants; and,

**WHEREAS**, these unregulated, foreign-labeled, carcinogenic, teratogenic, genotoxic, and cytotoxic agents, including known Persistent Organic Pollutants that are not authorized for use by any federal or state agencies, pose an immediate and severe threat to human health, including but not limited to acute poisoning, long-term genetic abnormalities, disruption of cellular metabolism, respiratory and reproductive harm, and neurological damage, as well as long-term environmental threats of contamination to soil, air quality, groundwater, surface waters, and wildlife ecosystems; and,

**WHEREAS**, under the Sustainable Groundwater Management Act (SGMA), four of the County's groundwater basins have been designated as medium priority basins, including the Shasta, Scott, and Butte Valley groundwater subbasins, which are sustainably managed by the Siskiyou County Flood Control and Water Conservation District acting as the Groundwater Sustainability Agency (GSA). Water Quality is a required sustainable management criterion that the GSA must monitor and report on annually to the Department of Water Resources (DWR). If the GSA does not meet the water quality standards and goals set forth in its Groundwater Sustainability Plans (GSPs), it risks having a GSP deemed "inadequate" by DWR. This could trigger state intervention by the State Water Resources Control Board (SWRCB), potentially shifting groundwater jurisdiction from the local community to the SWRCB; and,

**WHEREAS**, first responders, including deputies from the Sheriff's Office, taskforce members, game wardens, county officials, firefighters, emergency medical personnel, and environmental response teams, are increasingly encountering these illicit substances during the course of their duties, often without sufficient warning, appropriate personal protective equipment (PPE), and proper safety protocols for this new emerging public health threat. Additionally, medical personnel are not equipped or

trained to properly handle exposures or suspected exposures to these illicit products, which lack the required safety label language that registered pesticide products are required to have per federal and state law; and,

**WHEREAS**, several documented incidents across the state and within the county demonstrate how the smugglers/distributors of these illegal pesticide products continue to disregard state and federal regulatory requirements set forth by Cal/OSHA, the California Food and Agricultural Code (FAC), and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), resulting in worker safety concerns to cultivators and exploited workers at these illegal grow sites in addition to increased threats to first responders, resulting in serious medical consequences and occupational hazards for those exposed to these chemicals during eradication operations conducted by law enforcement personnel and firefighters during emergency response operations; and,

**WHEREAS**, many illicit cannabis operations are hostile to responders, booby-trapped, structurally unsound, or deliberately designed to evade detection, creating volatile and life-threatening conditions for personnel entering such sites; and,

**WHEREAS**, in recent weeks, responses from local and state fire departments have increased within the contaminated sites, during which pesticide-laced plastics, wood, structures, and fuel were actively burning, creating volatile organic compounds (VOCs) resulting in hazardous materials incidents, which endanger both first responders and nearby residents. This recurring pattern of toxic exposures demands immediate intervention to address the escalating local emergency; and,

**NOW THEREFORE BE IT RESOLVED** that due to the imminent and ongoing threat posed by unmonitored and unregulated illegal pesticides in conjunction with illicit cannabis operations to the health and safety of the public, the environment, waterways, and first responders within the County of Siskiyou, the Siskiyou County Board of Supervisors proclaims a "local emergency" and orders that said local emergency shall be deemed to continue to exist until its termination is proclaimed by the Board of Supervisors.

**BE IT FURTHER RESOLVED** that the Siskiyou County Board of Supervisors pursuant to Government Code section 8260(c) shall continue to review the need for maintaining the local emergency at least once every 60 days until its termination is proclaimed by the Board.

**BE IT FURTHER RESOLVED** that the Siskiyou County Board of Supervisors hereby proclaims and orders that during the existence of this local emergency, the powers, functions and duties of the Director of Emergency Services and the emergency

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organizations of this county shall be those prescribed by state law, ordinances, and resolutions of this county approved by the Board of Supervisors.

**BE IT FURTHER RESOLVED** that a copy of this proclamation shall be forwarded to the Secretary of the Governor's Office of Emergency Services (Cal OES) with a request that the Secretary of Cal OES confirm a Secretary's concurrence.

**BE IT FURTHER RESOLVED** that a copy of this declaration shall be forwarded to the Governor of California with a request that he proclaim the County of Siskiyou to be in a state of emergency.

**IT IS FURTHER ORDERED THAT:**

1. A coordinated, multi-agency and departmental emergency response task force shall be established to identify, mitigate, and remediate contaminated sites and illegal operations.
2. Emergency resources shall be allocated to equip and train first responders with appropriate HAZMAT protective equipment and protocols to reduce the risk of exposure in accordance with National Fire Protection Association and Occupational Safety and Health Administration guidelines.
3. The County Office of Emergency Services shall collaborate with the Sheriff's Office, Environmental Health, fire departments, and state and federal partners, including, but not limited to, the DEA, EPA, and CalEPA.
4. The County shall seek mutual aid, technical assistance, and emergency funding from state and federal sources to support enforcement, clean-up, and public education efforts.
5. Siskiyou County Public Health and the Siskiyou County Agriculture Commissioner will develop an outreach and communication plan to raise awareness among residents, workers, and landowners about the hazards associated with illegal pesticide use and unpermitted cannabis operations.
6. All relevant county agencies, including but not limited to, Siskiyou County Public Health, Siskiyou County Environmental Health, Siskiyou County Agriculture Commissioner, Siskiyou County Sheriff, and Siskiyou County Office of Emergency Services are authorized and ordered to take immediate and necessary actions to protect life, property, and the environment under this emergency proclamation, and to coordinate with the Siskiyou County Flood Control and Water Conservation District (acting as the GSA) to that end.

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**PASSED AND ADOPTED** by the Siskiyou County Board of Supervisors at a regular meeting of said Board, held on the 1st day of July, by the following vote:

AYES: Supervisors Valenzuela, Haupt, Harris, Kobseff and Ogren  
NOES: None  
ABSENT: None  
ABSTAIN: None

Signed by: Nancy Ogren  
Nancy Ogren, Chair  
Siskiyou County Board of Supervisors

ATTEST:  
LAURA BYNUM, COUNTY CLERK

By: Mandy Birmingham  
Deputy

Concurrence by  
Jeremiah LaRue  
Jeremiah LaRue, Siskiyou County Sheriff

Concurrence by  
Bryan Schenone  
Bryan Schenone, Director of Emergency Services

## EXHIBIT A – EXAMPLES OF CHINESE-LABELED PESTICIDES

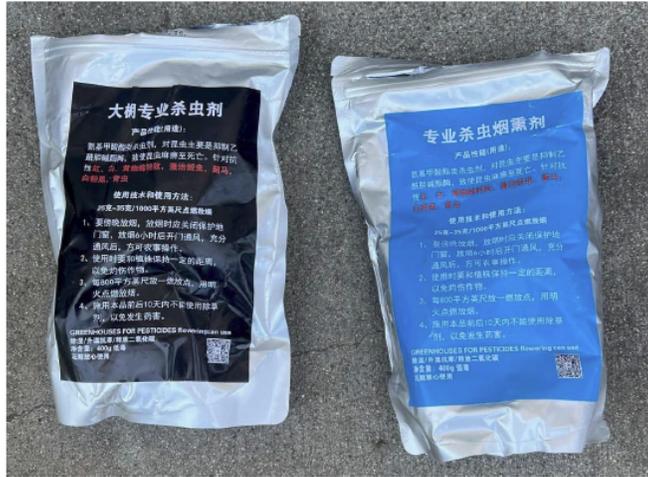
## Field Reference Guide

Package	Product Registration Certificate number (upper right on package)	Photo	Active Ingredient and Information
1	PD20130759		<u>Isoprocarb</u> Chinese characters: 异丙 Chinese simplified: Yi bing wei
2	PD20096840		<u>Isoprocarb</u> Chinese characters: 异丙 Chinese simplified: Yi bing wei
3	Not listed		<u>Pyridaben</u> This package does not have a registered certificate number, the primary ingredient is considered 'toxic if inhaled,' and tested positive in high concentrations for several chemicals listed as 'fatal if inhaled'. <b>Extreme caution should be exercised.</b>
4	PD20130759		<u>Isoprocarb</u> Chinese characters: 异丙 Chinese simplified: Yi bing wei
6	Not listed		<u>Unknown primary ingredient</u> This package does not have a registered certificate number and, while the primary ingredient could not be determined, the sample tested positive in high concentrations for several chemicals listed as 'fatal if inhaled'. <b>Extreme caution should be exercised.</b>
7	PD20180597		<u>Beta-cypermethrin</u> (translated) Chinese characters: 高效氯氟菊酯 Chinese simplified: Gaoxiao lüqingjuzhi

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Pesticides Identified in the Chinese Listed Pesticide Fungicide Products							
Based on lab analysis conducted thus far, the 2017 products contain a mixture of at least 3 to 2.2 off/perm (pesticides listed below)							
CAS	Pesticide	Pesticide Class	Acetylcholinesterase Inhibitor	DOE Pesticide List (EPCO 4874)	Prep 69 Listed	Trade Act Commodity (DOE 4874)	GW Pesticide (EPCO 4874)
28121-62-0	D-Phenylphosphorylcholine	Insecticide of Insect-Neurotoxin					
22453-73-6	Chloranil	Pyrethroid Insecticide		Yes, Category I Residual Pesticide			
2887-45-6	Chlorobutol (Dichlorobutylphosphorotriester)	Fungicide, Organic compound			Yes		Yes
21023-22-9	Chlorobutol	Organophosphorus Insecticide. Not registered for use in the United States	Yes				
22215-07-6	Cypermethrin (Salt and acid)	Pyrethroid Insecticide	Yes	Yes, Category II Residual Pesticide			
8050-09-9	Diazinuron	Not registered for use in the United States. (FAO group 1B, Neurotoxic organophosphate)					
62-73-7	Dichlorvos	Organophosphorus Insecticide	Yes	Yes, Category I Residual Pesticide	Yes	Yes	
88-80-7	Dinoseb	Organophosphorus Insecticide. Registration cancelled in 1974. Registered when applied, stored, or in use in certain circumstances. Not registered for use in the United States.					
2766-43-2	Fenitrothion (FIPIC)	Organophosphorus Insecticide. Not registered for use in the United States.	Yes				
28121-62-0	Fenprophos	Pyrethroid Insecticide	Yes		Yes		
8850-46-3	Fenprothion	Organophosphorus Insecticide	Yes				Yes
2876-18-1	Fenprothion	Fungicide. Not registered for use in the United States.					
118-74-1	Fenprothion	Organophosphorus Insecticide. Considered a pesticide of concern. Considered listed for use in the United States.			Yes		
28734-19-7	Gamma-HCH	Systemic Fungicide, Fights root rot, bacterial, viral, and viral diseases. Former registered in US.			Yes		Yes
2821-40-6	Gamma-HCH	Systemic Fungicide. Not registered for use in the United States.	Yes				
21465-08-6	Gamma-HCH	Pyrethroid Insecticide	Yes				
28752-77-6	Gamma-HCH	Systemic Fungicide. Registered Material (EPCO 4874)	Yes	Yes, Category II Residual Pesticide			Yes
20200-49-0	Gamma-HCH	Systemic Fungicide. Registered in 1974 and 1975. Not registered for use in the United States.					
288-86-0	Gamma-HCH	Systemic Fungicide. Registered in 1974 and 1975. Not registered for use in the United States.			Yes		
208-81-6	Gamma-HCH	Systemic Fungicide. Registered Material (EPCO 4874)				Yes	
22-48-6	Gamma-HCH	Organophosphorus Insecticide	Yes				
200-76-5	Gamma-HCH	Organophosphorus Insecticide	Yes	Yes, Category II Residual Pesticide	Yes		
20201-49-3	Gamma-HCH	Organophosphorus Insecticide					
22-48-6	Gamma-HCH	Organophosphorus Insecticide		Yes, Category II Residual Pesticide		Yes	
22809-10-0	Gamma-HCH	Organophosphorus Insecticide. Not registered for use in the United States.			Yes		
21138-08-7	Gamma-HCH	Organophosphorus Insecticide	Yes				
26500-71-3	Gamma-HCH	Organophosphorus Insecticide		Yes, Category II Residual Pesticide			
21112-28-0	Gamma-HCH	Organophosphorus Insecticide					
28734-19-7	Gamma-HCH	Systemic Fungicide		Yes, Category II Residual Pesticide			Yes
28734-19-7	Gamma-HCH	Systemic Fungicide. Registered in 1974 and 1975. Not registered for use in the United States.			Yes		Yes
21412-43-3	Gamma-HCH	Organophosphorus Insecticide. Not registered for use in the United States.					

Mr. OGLES. Now, I want to be clear, the CCP is the existential threat to the United States of America. CCP has set up operations to leverage cannabis operations, both illegal and, as you say, Mr. Larkin, legal operations in this country. They work hand-in-hand with the cartels in Mexico to undermine this country. So what is, in fact, a threat to the United States is not Homeland Security, but it is China and the Mexican cartels.

Unfortunately, instead of having a hearing on the CCP and illicit activities in our country, some of my colleagues on the other side of the aisle are more interested in protecting their suppliers for their personal use than they are of fulfilling their duty and protecting this country. I for one have had enough of this nonsense.

We need to recognize the truth that the CCP is setting up operations in this country. They want to destroy this country. They want to see us on bended knee. I say hell no. So whether it is 1, 3 on the schedule, whether it is legal or illegal, we have to recognize the fact that the CCP is within our borders, they are buying our farmland, and they are growing whatever they can grow that they can make money off of. My colleagues need to wake up and have an honest conversation about those facts instead of grandstanding and, again, protecting their own suppliers.

Mr. Urben, are Chinese TCOs laundering money in connection to these illicit marijuana grow operations? To what extent are they relying on preexisting China money-laundering networks in the United States?

Mr. URBEN. So the preexisting Chinese money-laundering networks, those networks funded this substantial increase in Chinese organized crime cultivation marijuana operations. They're the ones that funded it and stood this up on a massive basis. For example,

I never focused on marijuana trafficking during my career in DEA prior to this. What got my attention is when Chinese money launderers took over money laundering for the Mexican cartels in approximately 2018.

As we stood up this intelligence-gathering effort to understand Chinese organized crime, we were shocked at the marijuana grows that were in Northern California, exploiting the land, exploiting our money—our banking laws, our mortgage laws, taking water, taking electricity, the theft of it was just unbelievable. So we recognized that not only do we have to attack the Chinese money-laundering network, but we also had an opportunity, right, and a need to attack the Chinese cultivation grows that were happening throughout the United States: Colorado, Oklahoma, California, Maine, and elsewhere. The Chinese money launderers are the ones that funded this and set this up. That's why you saw so much money and the scale happen so quickly.

Mr. OGLES. Mr. Urben, just a few weeks ago, the Department of Treasury's Financial Crimes Enforcement Network, FinCEN, I am on Financial Services with which regulates that organization, highlighted the role of Chinese money-laundering networks in partnering with the Mexican drug cartels to launder drug profits. How does the earned money from illegal marijuana trafficking facilitate their money-laundering activities? Quite frankly, when you look at the supply chain that they are setting up, what other illicit goods may also be, such as human trafficking, are part of that supply chain?

Mr. URBEN. So one component of the organized crime revenue feeds the other. So, for example, the money launderers and the ability to purchase land and goods throughout the United States for cultivation assist the money launderers, the human trafficking component.

Getting back to the national security component to this, all of these revenue streams that is benefiting Chinese organized crime promotes and provides access points throughout our U.S. Government, promotes access to different places that they can corrupt, financial institutions that they can undermine.

Mr. OGLES. FinCEN recently warned the Chinese money-laundering networks pushed over 300 billion through U.S. financial institutions in just 5 years. How much of that volume do you believe is linked directly or indirectly to illicit marijuana operations?

Mr. URBEN. The majority or the significant component to that was the proceeds of Mexican cartel drug trafficking. A significant material component to that, I'm not going to put a percentage on it, but you're talking billions of dollars, was the illicit marijuana trade. It essentially put on steroids Chinese organized crime within the United States, the money they made off marijuana cultivation.

Mr. OGLES. I want to thank the witnesses. I apologize, I didn't have questions for you, and I thank you to the Chairman.

Chairman BRECHEEN. The gentleman yields.

I now recognize Representative Knott for his 5 minutes of questioning.

Mr. KNOTT. Thank you, Mr. Chairman.

Mr. Urben, I want to talk to you quickly about some of the misconceptions out there, but criminal organizations, the best ones,

are the hardest to catch. They have a proficiency of layering in camouflage, making it very difficult to apprehend, to investigate. In my time with law enforcement, there is some easy pickings. The guys that are walking around the sidewalk with an AK-47, that is easy. But it is the folks who are moving the currency, who are masking illegal with legal activities, so on, and so forth.

I want you to talk to us a little bit about how the Chinese criminals have successfully hidden in polite society. Because when I investigated marijuana cultivation that was illegal, they had a very intricate network of legal front businesses that enabled them to move millions of dollars that looked legitimate. But when you started to peel the onion back, it was a pretty harrowing viewpoint. So talk to us about how they are successful in betting in polite society.

Mr. URBEN. So they become so successful as to exactly what you said because they're being controlled by the top echelon of Chinese organized crime, some of the most sophisticated operators in the world. They're very sophisticated and disciplined in the sense that they engage in what we would view as low-risk criminal activities. the money laundering. The violent component to what Mr. Anderson stated, that's only more recently. They try to stay away from violence or what would, you know, have Federal prosecutors become interested in prosecuting them, hence marijuana trafficking, money laundering, human smuggling. They also rely on this network in the Chinese underground banking system that's been around for years. Last, we touched upon on this, it's very difficult to recruit confidential sources to engage these networks and wiretap these networks on WeChat is impossible.

Mr. KNOTT. Yep. In terms of the State structures, the State legalities, we were promised, if you legalize it, you will see less illegal marijuana. If you legalize it, there won't be nearly as many incidents with toxicities and so forth. In my experience prosecuting these cases, they used a sloppy legalization effort to almost balloon the amount of marijuana they were able to traffic. It was illegal in many instances, but the sloppy legal structures has brought about a greater problem in many respects.

Mr. URBEN. So we don't have the regulatory component to this in place that would negate subsidizing or allowing organized crime on a national basis to exploit the marijuana market.

Mr. KNOTT. In your—one of the things that is often misstated, it is framed as though you have a marijuana dealer and then every other type of criminal. In my experience, organized crime touches the full spectrum when they get to a certain level: methamphetamine, heroin, fentanyl. Marijuana is just one component of it. So to splice it out is often an inaccurate assumption. Is that your experience?

Mr. URBEN. Absolutely.

Mr. KNOTT. Mr. Larkin, briefly, you mentioned, I will give you a chance to answer the question that Mr. Carter asked, would it be wise, yes or no, to legalize marijuana in the country, in your opinion?

Mr. LARKIN. No, it would not.

Mr. KNOTT. Why?

Mr. LARKIN. It is a problematic drug when you use it heavily or on a long-term basis. What I was going to say in response to the

answer is we have not only the Controlled Substances Act at work here, we also have the Food, Drug, and Cosmetic Act. For 80 years we've trusted the FDA with deciding what is a drug and whether it is safe, effective, and uniformly made. The FDA could not say the cannabis plant is safe, effective, and uniformly made because it's not.

Mr. KNOTT. Well, one of the mistruths that proponents say is that there really isn't any problematic effects to marijuana. It was interesting because when I was prosecuting organized crime, I only had a few cases, but they were really big cases in terms of quantity, in terms of sophistication, dealing with marijuana, but they targeted young people. Please describe the effects that young people suffer when they are exposed to high levels of marijuana on a continued basis.

Mr. LARKIN. The juvenile brain is in a labile state, particularly in men. It doesn't come fully formed until early in the 20's. The problem is the THC content of cannabis today is not what it was back in the days of Woodstock. Back then it was 3 to 6 percent THC. Now in the plants it can be up to 40 percent and in processed forms it can be 90 percent.

Mr. KNOTT. Has there been a successful State system that controls the supply of marijuana to deliver only safe product to the consumer?

Mr. LARKIN. Not to my knowledge. The problem is there is too great an amount of disuniformity in the product that's being sold. A few years ago, Nora Volkow, the director of the National Institute on Drug Abuse, said, we don't have in place the mechanisms to make sure that what is being sold lacks the pesticides that we know are coming from China and that are creating problems and will create even bigger problems 10 to 20 years down the road when we start seeing spikes in areas where there is a greater incidence of cancer because of it.

Well, thank you witnesses for your testimony. I am sorry I am out of time. Mr. Anderson, I had a lot of questions for you lined up, but maybe we will get a second round if we are fortunate. If not, I hope to have you back.

Mr. Chairman, I do have a UC request. I have got an example here. It is a Department of Justice press release detailing 7 Chinese nationals and their roles in money laundering millions of dollars and smuggling kilograms of illegal marijuana.

Chairman BRECHEEN. The gentlemen asked it be put in the record. Without objection—

Mr. KNOTT. Thank you.

Chairman BRECHEEN [continuing]. So ordered. The gentleman yields.

[The information follows:]

PRESS RELEASE, U.S. ATTORNEY'S OFFICE, DISTRICT OF MASSACHUSETTS

TUESDAY, JULY 8, 2025

SEVEN CHINESE NATIONALS CHARGED FOR ALLEGED ROLES IN MULTI-MILLION-DOLLAR MONEY LAUNDERING, ALIEN SMUGGLING AND DRUG TRAFFICKING ENTERPRISE

*Defendants allegedly smuggled Chinese nationals into the United States to work at grow houses in suburban neighborhoods, cultivating and distributing kilogram-sized quantities of marijuana*

**BOSTON.**—Seven Chinese nationals were charged today in connection with a multi-million-dollar conspiracy to cultivate and distribute marijuana across the Northeast that used interconnected grow houses concealed inside single-family properties in Massachusetts and Maine. It is alleged that Chinese nationals were smuggled into the United States to work in these grow houses without access to their passports until they repaid their smuggling debts.

The following individuals have been indicted on one count each of conspiracy to manufacture, distribute and possess with intent to distribute marijuana, as well as additional charges listed respectively:

1. Jianxiong Chen, 39, of Braintree, Mass. also indicted on one count of money laundering conspiracy, 11 counts of money laundering and one count of bringing aliens into the United States;
2. Yuxiong Wu, 36, of Weymouth, Mass. also indicted on one count of money laundering conspiracy and four counts of money laundering;
3. Dinghui Li, 38, of Braintree, Mass. also indicted on one count of money laundering conspiracy and two counts of money laundering;
4. Dechao Ma, 35, of Braintree, Mass. also indicted on one count of money laundering conspiracy and two counts of money laundering;
5. Peng Lian Zhu, 35, of Melrose, Mass. also indicted on one count of money laundering conspiracy;
6. Hongbin Wu, 35, of Quincy, Mass.; and
7. Yanrong Zhu, 47, of Greenfield, Mass. and Brooklyn, N.Y.

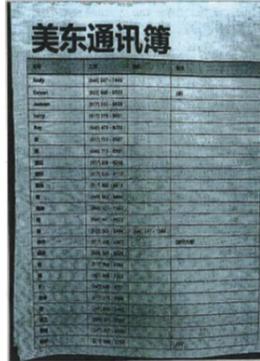
Six defendants were arrested this morning. Yanrong Zhu remains a fugitive.

*"This case pulls back the curtain on a sprawling criminal enterprise that exploited our immigration system and our communities for personal gain. These defendants allegedly turned quiet homes across the Northeast into hubs for a criminal enterprise—building a multi-million-dollar black-market operation off the backs of an illegal workforce and using our neighborhoods as cover. That ends today," said United States Attorney Leah B. Foley.*

"Today, we arrested members of an alleged Chinese-run drug trafficking organization who are accused of running a massive marijuana cultivation and distribution scheme that has raked in millions and contributed widely to the illegal drug trade here in the Northeast," said Ted E. Docks, Special Agent in Charge of the FBI's Boston Division. "Equally disturbing is that Jianxiong Chen—the accused ringleader of this organization—is charged with paying to smuggle a Chinese national across the Mexican border to work at his grow houses. This takedown highlights the need for a sustained law enforcement effort, across all levels, to shut down and thoroughly investigate the organized criminal enterprises behind these unlicensed and illegal operations."

"The Massachusetts State Police share the resolve of our Federal and local partners to support safer communities across the Commonwealth," said Colonel Geoffrey D. Noble, Superintendent of the Massachusetts State Police. "Troopers assigned to our Special Services Section used their training and skill in this Operation to respond to the concerns of our neighbors, disrupt these illicit growing activities, and improve the quality of life across Massachusetts. Each of these properties can now return to their intended purpose as homes which our communities desperately need."

According to the charging documents, from in or about January 2020, the defendants allegedly owned, operated or partnered with a network of interconnected grow houses in Massachusetts and Maine to cultivate and distribute kilogram-sized quantities of marijuana in bulk. Specifically, the enterprise allegedly operated grow houses in Braintree, Mass.; Melrose, Mass.; and Greenfield, Mass., among other locations in Massachusetts, Maine and elsewhere. It is alleged that the grow house operators maintained contact with each other through a list of marijuana cultivators and distributors from or with ties to China in the region called the "East Coast Contact List."



It is alleged that Chen controlled several grow houses in Maine as well as a home in Braintree, Mass., which served as a base of operations for the enterprise. Marijuana manufactured by the interconnected grow house network, as well as bulk cash from dealers, was allegedly delivered to and redistributed by Chen at this Braintree residence. It is further alleged that co-conspirators concealed the marijuana and cash they were delivering to Chen inside the engine compartments of their vehicles. During a search of the home in October 2024, over \$270,000 in cash was allegedly recovered from the house and from a Porsche in the driveway, as well as several Chinese passports and other identification documents inside a safe.

An alleged grow house located in Braintree, Mass., where Dechao Ma resided. It is alleged that during an October 2024 search of the residence, approximately 30 kilograms of marijuana and almost \$30,000 in cash were seized.



An alleged grow house located in Braintree, Mass., where Dechao Ma resided. It is alleged that during an October 2024 search of the residence, approximately 30 kilograms of marijuana and almost \$30,000 in cash were seized.

Data extracted from Chen's cell phone allegedly revealed that he helped smuggle Chinese nationals into the United States—putting the aliens to work at one of the grow houses he controlled while keeping possession of their passports until they repaid him for the cost associated with smuggling them into the country.

It is alleged that profits from the marijuana sales, which totaled in the millions of dollars, were used to purchase luxury homes, automobiles, jewelry and other items in Massachusetts including to expand the enterprise through the purchase of real estate.

Additional October 2024 searches of grow houses located in Braintree and Melrose where Maand Zhu resided, respectively, allegedly resulted in the seizure of over 109 kilograms of marijuana, nearly \$200,000 in cash and numerous luxury items including a gold Rolex watch with a \$65,000 price tag still on it.



Over 50 kilograms of marijuana allegedly seized from Zhu's residence in Melrose.

It is further alleged that the enterprise conducted bulk cash transactions with operators located in the Eastern District of New York. According to court documents, in June 2023, Hongbin Wu and Yanrong Zhu were stopped by law enforcement after leaving a grow house in Greenfield, Mass., during which \$36,900 in cash was seized from the defendants.



\$36,900 allegedly seized during June 2023 traffic stop.



Hongbin Wu allegedly wearing a "money laundering" t-shirt.

The charge of conspiracy to manufacture, distribute and possess with intent to distribute marijuana provides for a sentence of up to 5 years in prison, at least 2 years of supervised release and a fine of up to \$250,000. The charge of money laundering conspiracy provides for a sentence of up to 20 years in prison, up to 3 years of supervised release and a fine of up to \$500,000, or twice the amount involved, whichever is greater. The charges of money laundering each provide for a sentence of up to 10 years in prison, up to 3 years of supervised release and a fine of up to \$500,000, or twice the amount involved, whichever is greater. The charge of bringing aliens into the United States provides for a mandatory minimum sentence of 3 years and up to 10 years in prison, 3 years of supervised release and a fine of up to \$250,000. Sentences are imposed by a Federal district court judge based upon the U.S. Sentencing Guidelines and statutes which govern the determination of a sentence in a criminal case.

U.S. Attorney Foley, FBI SAC Docks and MSP Superintendent Colonel Noble made the announcement today. Valuable assistance was provided by the Drug Enforcement Administration; New York State Police; Maine State Police; and the Braintree, Westchester County and New York Police Departments. Assistant U.S. Attorney Christopher J. Pohl of the Narcotics & Money Laundering Unit is prosecuting the case.

This case is part of Operation Take Back America, a nationwide initiative that marshals the full resources of the Department of Justice to repel the invasion of illegal immigration, achieve the total elimination of cartels and transnational criminal organizations and protect our communities from the perpetrators of violent crime. Operation Take Back America streamlines efforts and resources from the Department's Organized Crime Drug Enforcement Task Forces (OCDETF) and Project Safe Neighborhood (PSN).

The details contained in the charging documents are allegations. The defendants are presumed innocent unless and until proven guilty beyond a reasonable doubt in a court of law.

Updated July 9, 2025.

Chairman BRECHEEN. I now recognize Mr. Green for his 5 minutes of questioning.

Mr. GREEN. Thank you, Mr. Chairman. I thank the Ranking Member as well.

The Chinese money laundering that is taking place, why is it so difficult for us to understand how it is being done and to prevent it from being done?

Mr. URBEN. Thank you, sir. They came to dominate the industry for several reasons. No. 1, in the past, there was always a certain cost to money laundering. It was 7 to 10 percent certainly to get those funds back to the Mexican cartel. The Chinese money launderers changed the game in that, No. 1, they absorbed all the risk of laundering those funds; No. 2, they did it for 1 to 2 percent; No. 3, the funds that are collected, the bulk cash from sales of narcotics in this country that they take ownership or custody of, they began to sell to Chinese nationals that wanted to invest in the United States. They do this globally with a trusted network with what's called the Chinese underground banking system.

Last but certainly not least, they utilize the encrypted app called WeChat, which is controlled and monitored in mainland China that U.S. law enforcement cannot have any judicial process, we can't wiretap it. So what it allows for is that organized crime network globally to communicate with trust and speed. No other organized crime group in the world has ever had a communication system similar to this.

Mr. GREEN. Are they using cryptocurrency? Explain, please.

Mr. URBEN. Yes. So certainly in the last 2 years, the crypto component of the money-laundering cycle has taken on a much more substantial role. As crypto is being used more and more globally, it's actually taken on more of a role in the money laundering process because the Mexican cartels would like to receive those funds in crypto. So it's part of the process now.

Mr. GREEN. How do you recommend we deal with this, given that we now have these electronic transfers? It makes it rather difficult to—I want to stop it. I am just trying to get a sense from you as experts as to how we can do it.

Mr. URBEN. So the networks that exist right here within the United States, those Chinese money launderers on a daily basis pick up that bulk cash. So when we were talking about earlier of this interagency task force that was designed to go after Chinese organized crime with severe penalties such as the racketeering laws, it should be stood up and funded. That's the first thing.

The second thing is in terms of what we saw last couple weeks ago from FinCEN, that directive to the banking industry to enhance compliance, red flag reporting on the money-laundering transactions.

Last, WeChat itself needs to be impacted. It cannot be utilized by Chinese money launderers on an on-going basis, again, in this trusted network where they can communicate and move money.

Mr. GREEN. The suspicious activity reports are not enough for this large sum of money?

Mr. URBEN. It's not enough in the sense that financial institutions, crypto companies, wire emitters, need to enhance and increase the suspicious activity reporting and their AML compliance to focus on Chinese money-laundering networks.

Mr. GREEN. Well, let me just close with this. I am new to this money laundering and I am trying to make sure that I get a better understanding of it. I believe that my understanding of what is

happening in financial services can help me with what is happening here in Homeland Security. Is there any piece of legislation that you would call to my attention that might be helpful? Is there anything that you would have us do in terms of legislation?

Mr. URBEN. Over the last 18 months, the FEND Off Act and the HALT Act were good examples of successes in terms of legal legislative process. What I would suggest is this interagency task force that needs to be stood up nationally with the mandate to go after Chinese organized crime, fully funded, data scientists, Mandarin translators, everything that's needed on that task force to attack the network.

The second part is the racketeering laws need to be imposed on Chinese organized crime. There needs to be a legislative or some sort of Executive branch solution with the Chinese government when it comes to WeChat, so it's not utilized on a global basis by Chinese organized crime. Again, through legislative process that allows law enforcement to wiretap it or some negotiated strategy with the Chinese government where they negate the ability of WeChat to be utilized.

Mr. GREEN. Yes, sir. If the Chair would permit.

Chairman BRECHEEN. Go ahead.

Mr. LARKIN. It's also worth looking into the problem that people are obscuring, as your colleague said, through a lot of different layers of dummy corporations, who the real parties and interests are. We need to start requiring that the real parties and interests be identified before whenever they are part of Chinese organized crime or a foreign government that is adverse to our interests. Because the easier you make it for law enforcement to try to see who really is owning this property and, therefore, what's going on at it, the easier it might be for law enforcement to take steps to stop the money laundering and the ultimate activity itself.

Mr. GREEN. Thank you, Mr. Chairman.

Chairman BRECHEEN. The gentleman yields.

If our panel of experts would be willing, you know, given the inability to dive a little deeper, I wish we had gotten to in the middle of this, there is going to be a few of us that stick around and ask a few more questions. If the panel, if you have got time to expedite this, for your sake and ours, I am going to ask the committee Members limit their time to 3 minutes.

So with that, I am going to go out of order here. I am going to let Representative Ogles go first. I will follow through with anybody on the Democrat side and then—Democratic side. If, Mr. Knott, you want to follow him and then I will go last and I will watch my time because I have got a time constraint.

All right. So with that said, Representative Ogles, you are recognized for 3 minutes.

Mr. OGLES. Again, thank you, Mr. Chairman, and to the witnesses.

Director Anderson, it seems like these illegal grow operations are run by a core criminal element that oversee low-level workers who are often victims of trafficking. Is this an accurate description based on your experience?

Mr. ANDERSON. Yes, sir, you absolutely hit the nail on the head, it is. You have upper management, very well-organized

transnational criminal organizations. But with that comes every other crime with it, which is the human trafficking, the labor trafficking, the sex trafficking, and the violent crime and every other crime that follows underneath it.

Mr. OGLES. Now, is there, from your experience, a difference that you have seen between the immigration status of the low-level workers versus the higher-level criminals that are actually operating these networks?

Mr. ANDERSON. Well, there's a definite difference between the two. So your high-level transnational criminal organization, your person who's running operations, they look different, they dress different, they drive different vehicles. Then your migrant worker comes in, you know, once again, they look different, they dress different, they—how they dress, how they speak to, to even how they address you, meaning me in law enforcement, is totally different. But there is a big significant difference between the two. Yes, sir.

Mr. OGLES. So is it fair to say when you look at the complexity of this problem, that the high-level organizers, the traffickers, the low-level individuals that they are using in these illicit activities, they are literally throwaways; that if they get caught, they get incarcerated, they will just replace them with someone else?

Mr. ANDERSON. Those are basically what we call victims. True.

Mr. OGLES. Mr. Larkin, to what extent is the CCP tied to these Chinese TCOs operating in the United States? Do you believe that the CCP is aware of the Chinese nationals who leave China to establish criminal operations in the United States?

Mr. LARKIN. China is the most heavily surveilled nation in the world. It's difficult to believe that the CCP is unaware of people who are engaged in criminal activities in other nations, like what's happening here with Chinese organized crime. Keep in mind, you don't have to prove an affirmative agreement between them. All you have to do is show through circumstantial evidence that the CCP is aware of and is helping out the organized crime measures.

If you look at the statements the three of us have submitted, you'll see there are various types of evidence that points to knowledge by the CCP and the PRC of what is going on in Chinese organized crime. That's the sort of evidence that the Supreme Court has said would be sufficient to justify a guilty verdict for conspiracy to engage in this activity.

Mr. OGLES. Well, thank you to the witnesses. Thank you to the Chairman. I yield back.

Chairman BRECHEEN. The gentleman yields.

I now recognize Representative Thanedar for 3 minutes for his questions.

Mr. THANEDAR. Thank you, Chairman.

Illegal marijuana grows are a threat. Marijuana grown illegally can be saturated with chemicals that are dangerous to humans. The money generated by selling illegal marijuana on the black market funds criminal organizations and the illegal grows bring all sorts of crime and destruction into American communities. The Federal Government needs a coordinated strategy to do all it can to shut down these illegal marijuana grows. I think we can all agree on that.

Nevertheless, the Trump administration is eliminating the Organized Crime Drug Enforcement Task Force, which is the largest anti-crime task force in the country. For 40 years, OCDETF has helped disrupt and dismantle criminal networks with a drug-centric focus until Donald Trump. First Trump wrongly expanded OCDETF's mission to focus on illegal immigration. Now President Trump has a budget request that eliminates OCDETF entirely.

Mr. Urben, in your experience at the DEA, how would you describe the role of OCDETF plays in combating illegal drug trafficking? Do you think that eliminating OCDETF will help combat illegal marijuana cultivation, particularly by the Chinese criminal organizations?

Mr. URBEN. So during my career, I called it "OCDEF," So I'll refer it as OCDEF, sorry. There was a tremendous benefit for OCDETF. No. 1, it synchronized manpower and the agencies to work together. It designated the targets, the top levels of organized crime that we were going to target collectively, and then it also funded that. So it was a mechanism to synchronize Federal law enforcement. It was very successful. I would suggest, A, you either utilize OCDETF or you bring the equivalent and successes of OCDETF that are necessary to go after Chinese organized crime, the Mexican cartels, et cetera.

Mr. KNOTT. Will the gentleman yield?

Mr. THANEDAR. Yes, sure.

Mr. KNOTT. What does that acronym stand for? Do you know?

Mr. THANEDAR. Organized Crime Drug Enforcement Task Force.

Mr. KNOTT. Thank you, sir.

Mr. THANEDAR. Chairman, I yield back.

Mr. OGLES [presiding]. Thank you.

Recognize the gentleman, Mr. Knott, for 3 minutes.

Mr. KNOTT. Mr. Anderson, I have got a question for you. In terms of your experience in local law enforcement, what effect over the last 20 years-plus of your career has international criminal activity had on the local law enforcement community? You, yep.

Mr. ANDERSON. I'm sorry. Well, the international crime has had a huge impact on our local law enforcement community. So understand almost every precursor used to manufacture methamphetamine, fentanyl, or any other illicit manufactured drug like that comes from China to the cartels to across the rest of the United States—

Mr. KNOTT. Yes.

Mr. ANDERSON [continuing]. Which that's a fact in every community across the United States.

Mr. KNOTT. Yes.

Mr. ANDERSON. But also with that is the underlying crime, such as the homicides, the sex trafficking, all the other crimes that come along—right along with it, which it affects every community in the United States.

Mr. KNOTT. Right.

Mr. ANDERSON. So it affects absolutely everyone. No one's immune from it. Oklahoma is a very rural State of 4 million people and we're devastated by transnational criminal organizations.

Mr. KNOTT. In terms of the open border of the last 4 years, how did that affect organized crime in your local communities?

Mr. ANDERSON. So I understand, and I got to say this, first off, I'm not a politician. I'm not even a political appointee.

Mr. KNOTT. I'm not asking. I was in law enforcement before I ran here.

Mr. ANDERSON. But I have to say that because it's going to sound like I am.

Mr. KNOTT. Nope, I'm asking you that—your perspective.

Mr. ANDERSON. I'm telling you, and I've seen it both ways—

Mr. KNOTT. Yep.

Mr. ANDERSON [continuing]. I've seen when we couldn't get anything. I mean, we—as matter of fact, we were on a T3 and we was purchasing kilos of methamphetamine. Trump closed the border down during COVID, nothing.

Mr. KNOTT. Yes.

Mr. ANDERSON. I mean, it was 6 months.

Mr. KNOTT. Cocaine—

Mr. ANDERSON. Anything.

Mr. KNOTT [continuing]. And heroin—

Mr. ANDERSON. Anything.

Mr. KNOTT [continuing]. And crack, all of it. Yes.

Mr. ANDERSON. Then we leave, we change administrations, we're flooded, we're inundated with controlled dangerous substances. Once again, I'm not making a political statement. I'm telling you what I've seen.

Mr. KNOTT. What effect does that have on law enforcement? Can you successfully fight crime with an open border?

Mr. ANDERSON. With an open border?

Mr. KNOTT. Yes.

Mr. ANDERSON. No.

Mr. KNOTT. Yes.

Mr. ANDERSON. Absolutely not.

Mr. KNOTT. In regards to the task force model linking Federal and State law enforcement, have you had any kind of experiences with that in your career?

Mr. ANDERSON. I have. I'm actually a task force guy. I operated a task force for many years. On that task force was including Federal agents and local agents.

Mr. KNOTT. Yes.

Mr. ANDERSON. We still currently operate with our Federal partners on task forces.

Mr. KNOTT. In terms of force multiplication, on the good side of the ledger, in my opinion, there is no greater way than task forcing Federal and local jurisdictions together. Do you agree with that?

Mr. ANDERSON. I absolutely agree with it, and we do it every day. Whenever I came into the bureau, 6 years ago, we were down to approximately 50 agents. We're up to around 130 now. That's primarily because we TFO, task forcing.

Mr. KNOTT. Yep. I have long been an advocate, sir, that every Federal law enforcement agency should utilize and grow their task force program because international crime affects every community large and small across the country. Isn't that true?

Mr. ANDERSON. That is absolutely correct.

Mr. KNOTT. Well, Mr. Anderson, thank you. I am glad I got a second round to ask you questions. To all the witnesses, please come back and talk to us about this important topic.

Mr. Chairman, I yield back.

Mr. OGLES. The gentleman yields.

We're concluding here. Last thoughts, we have 3 minutes, so essentially a minute each. Mr. Urben, final thought.

Mr. URBEN. We've demonstrated what the effect is on the communities. We have the intelligence. I would ask that you fully fund a task force to attack these networks.

This is not that hard. It's tough work. It's difficult. It's challenging. But fund a task force and give them the mandate to attack these networks with individuals like Mr. Anderson, please.

Mr. OGLES. Mr. Larkin.

Mr. LARKIN. In the short run, the most important thing to do is educate the people in your communities about these problems. I think when people think of drug problems, they think of Mexico. They don't think of China. They have some idea that China is involved in selling fentanyl precursors, but they don't realize the full extent of the tentacles that China has extended into the United States. The public needs to know this.

Holding this hearing is important, but it is also important that you tell the people in your communities about what is happening. Remember, the Chinese are playing the long game. They can do this for decades, for centuries. They don't care. But we can't do that. We have to act now.

Mr. OGLES. Mr. Anderson.

Mr. ANDERSON. I think it is imperative that we educate the public on what's going on in the Nation, especially when it comes to the CCP and the rest of the world, and the movement that we know that we are seeing that is going on and transpiring. When you're talking about the long game, they're in the long game. They've been doing this for many, many years. When you talk about what's going on with the money laundering between—and the precursors, since we can go all the way back to 2007, that's what we know for sure. Whenever the cartels started reaching out to the people in China and making these deals, that's when—that's how far back it's been. So we're already into the long game.

One thing I would ask legislation to do and to seriously look at, I do think we're better whenever we bring all of our resources together and we combat a problem, because you're talking about a really huge global network. We have to bring our people together. We have to bring our experts together, and we have to fight this within.

I would also ask that this legislation looks at the Communication Act of 1996. If you look at, and you've been a Federal prosecutor, you look at how we've dismantled criminal organizations across the United States, we've done it through that act. That act is outdated. The criminal element has surpassed us. We can't do the cases like we used to because of all these encrypted apps that are floating around on everyone's phones. So I would ask that you look at that as well.

Thank you for your time. I really appreciate you inviting us to be here today.

Mr. OGLES. It's clear from this hearing that the CCP is in a coordinated attack against the United States of America. Whether it is through their trafficking network, the cyber attacks, or facilitation of the Mexican cartels, they have declared an asymmetric war on this country, and it is time that we fight back with all the tools and resources that we have at our disposal.

I thank the witnesses for their valuable testimony and the Members for their questions. The Members of the subcommittee may have additional questions for the witnesses, and we ask the witnesses to respond to these in writing. Pursuant to committee rule VII(E), the hearing record will be open for 10 days.

Without objection, we are adjourned.

[Whereupon, at 12:12 p.m., the subcommittee was adjourned.]



# APPENDIX I

SUPPLEMENTAL MATERIAL SUBMITTED BY DONNIE ANDERSON



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

### Chinese Nationals and Marijuana in the United States - Introduction

An unprecedented expansion of Chinese-operated marijuana farms has been tracked across the United States, with operations stretching across the country from California to Maine. Investigations have revealed a sophisticated network that has rapidly become the dominant force in America's illicit cannabis trade. Through these investigations, black-market activities have been uncovered, stretching far beyond simple illegal grows. These operations involve the use of hazardous materials to fertilize the marijuana, sophisticated money laundering schemes, human trafficking, and organized crime networks that challenge law enforcement. Throughout this briefing report, how these criminal enterprises operate, their impact on legal cannabis markets, and why they have proven so difficult to shut down will be examined.



Source: KGW News Oregon

### The Scale of Chinese Black-Market Cannabis Operations

Chinese marijuana operations now dominate the U.S. illegal drug market at levels never seen before. Oklahoma's illegal marijuana production alone ranges between \$18 billion and \$44 billion each year.<sup>[1]</sup> Chinese criminal groups run more than 80% of these marijuana farms, which shows a dramatic change in America's drug world.<sup>[1]</sup>

These Chinese criminal networks have grown faster since early 2020 and set up sophisticated marijuana farms across the country. Oklahoma saw its licensed marijuana grows reach almost 10,000 by late 2021, which provided perfect cover for illegal operations.<sup>[1]</sup> Maine has become the latest target for this trade, with hundreds of suspected unlicensed grow houses now operating in the state.<sup>[2]</sup> The operations have become more complex, as shown by recent Department of Justice charges. Seven Chinese nationals face accusations of running a multi-million dollar marijuana trafficking ring that focused on Massachusetts and Maine.<sup>[3]</sup> What was perceived as a few isolated cases has turned into a coordinated criminal network that spans multiple states. This poses new challenges that American law enforcement and policymakers have never faced before.

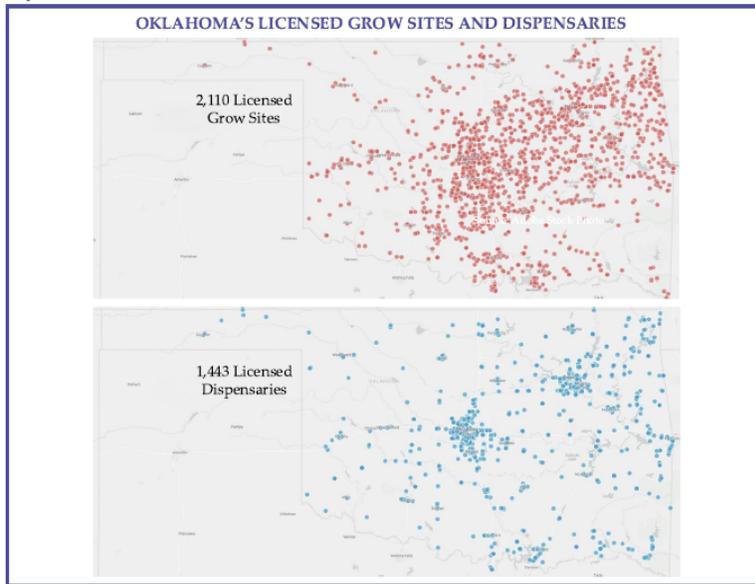
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**BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES**

**The Spread of Chinese Marijuana Farms Across the United States**

From California to Oklahoma: the Migration of Chinese Marijuana Growers - Chinese marijuana operations have spread across America in a clear pattern. They started in California over a decade ago and have now expanded to states that have favorable growing conditions with less oversight. Oklahoma became a hotspot for Chinese marijuana operations after voters said “yes” to medicinal marijuana in 2018. The state stood out because it did not limit the number of dispensaries or growing operations. <sup>[1]</sup>



STATE	POPULATION OF STATE <sup>[4]</sup>	LICENSED CULTIVATION / GROW SITES	LICENSED DISPENSARIES/RETAILERS
CALIFORNIA	39,538,223	4,614 <sup>[5]</sup>	1,803 <sup>[5]</sup>
OKLAHOMA	3,959,353	2,110 <sup>[6]</sup>	1,443 <sup>[6]</sup>

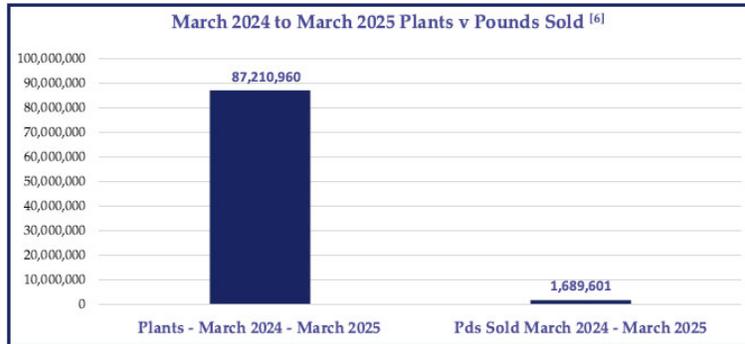
Oklahoma has approximately 10% of California's population, yet it has approximately 46% the number of licensed marijuana cultivation/grow sites as California (2,110 to 4,614), and approximately 80% the number of licensed dispensaries/retailers (1,443 to 1,803) <sup>[6]</sup>



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

The lack of regulations limiting the number of dispensaries or grow operations created opportunistic conditions for illegal activities. State investigators found connections between foreign criminal networks and over 3,000 illegal grows— more than 80% of these were Chinese-run. [1] The Oklahoma Bureau of Narcotics (OBN) shut down more than 800 farms in two years. About 75% of these had links to Chinese investors and organized crime. [2] Several economic factors drew operations to Oklahoma: land costs were nowhere near California prices, law enforcement resources were stretched thin, and legal gaps let “straw owners” hide foreign investment. [1]

In 2023, licensed cannabis production in Oklahoma exceeded licensed medical marijuana demand by at least 32 times, with enough capacity to meet total state needs 4.5 times. [8] From March 2024 to March 2025, there were 87,210,960 marijuana plants reported at licensed grow sites, but only 1,689,601 pounds sold at dispensaries. With 1-plant equaling approximately 1 lb. of processed marijuana, 85.5 million plants are unaccounted for, which in turn equates to \$153 billion in plants/proceeds missing, with black market marijuana selling for approximately \$1,800 lb. [6]



Chinese Marijuana Farms in Maine Under Investigation - Maine has become the latest target for illegal Chinese marijuana operations. Since 2020, prosecutors say hundreds of single-family homes across Maine were bought by Chinese nationals. These homes were stripped down and turned into large-scale illegal cannabis farms. [2] In Maine, a typical 2,500-square-foot operation can produce 100 pounds per harvest, with 4 to 12 harvests annually. [2] The production efficiency is impressive, as a single property can generate between \$1 million to \$3 million in annual revenue. [2]

In August 2023, the Department of Homeland Security (DHS) documented approximately 749 properties in Maine and Washington state connected to Asian Transnational Criminal Organizations (TCOs), with 270 properties in Maine actively engaged with Chinese operations. [2] Federal authorities recently charged seven Chinese nationals for their alleged roles in a “multi-million-dollar money laundering, alien smuggling and drug trafficking enterprise.” [9]



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

### Labor Trafficking and Worker Exploitation

Throughout the course of multiple extensive investigations into illegal Chinese marijuana operations, a disturbing pattern of systematic labor exploitation has been uncovered, that preys on vulnerable immigrants. The findings reveal a calculated recruitment scheme that has trapped thousands of Chinese workers in abusive conditions across multiple states. United States (U.S.) border authorities found 37,000 Chinese nationals crossing the southern border without proper documentation in 2023.<sup>[10]</sup> This number surpasses the total from the previous decade. Many of these migrants ended up working at marijuana farms throughout the country.

One tactic discovered to be utilized by criminal organizations, was Chinese immigrants who lost work during the COVID-19 pandemic, were specifically being targeted.<sup>[11]</sup> Their sophisticated recruitment strategy includes:

- Social media advertisements promising \$200 daily wages<sup>[11]</sup>
- False job descriptions of legitimate agricultural work, i.e. "gardening" and "flower cutting"<sup>[11]</sup>
- Guaranteed housing and meals<sup>[11]</sup>



**Living and Working Conditions** - The reality these workers face stands in stark contrast to the promises made. It was documented that workers were being forced to endure 14-hour workdays<sup>[11]</sup>, while living in deplorable conditions. In one operation, 20-30 people were found crammed into a single room with just one bathroom and no air conditioning.<sup>[12]</sup>

Workers sleep in various makeshift accommodations:

- Wooden sheds with dirt floors<sup>[10]</sup>
- Trailers without basic utilities<sup>[10]</sup>
- Greenhouse floors<sup>[11]</sup>
- Fields and ditches, exposed to the elements<sup>[11]</sup>



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

**Human Rights Violations** - Investigations have revealed severe human rights violations across these operations. Upon arrival, workers often have their phones and car keys confiscated.<sup>[11]</sup> Cases have been documented where armed guards with guns and machetes patrol the premises<sup>[11]</sup>, and workers face constant surveillance through cameras and security personnel.<sup>[13]</sup> The exploitation extends beyond confinement. Workers report receiving no payment for their labor, with some owed up to \$12,000 in promised wages.<sup>[11]</sup> Numerous cases were encountered where workers were exposed to dangerous chemicals, resulting in visible burns on their hands and arms. Many appeared malnourished and showed signs of physical abuse.<sup>[10]</sup>

Perhaps most disturbing is the discovery of human trafficking elements. Evidence has been found of workers being smuggled directly to farms through Mexican border crossings, with farm owners paying approximately \$20,000 per worker to trafficking networks. These workers are then forced to work for two years to pay off their "debt."<sup>[12]</sup> When workers attempt to demand their wages, they can face violent retaliation. In one instance, a worker who requested payment found himself being threatened by a guard armed with an AK-47 semi-automatic rifle.<sup>[12]</sup> The presence of drugs, cash, and weapons has created an environment where violence is commonplace, and workers live in constant fear of retaliation if they speak out or attempt to escape.<sup>[12]</sup>

### Border Encounters – Individuals with Chinese Citizenship

The following information obtained from the United States Customs and Border Protection, illustrates the significant rise in encounters with individuals identified with People's Republic of China citizenship. These encounters are nationwide numbers, and include the northern and southern land borders of the U.S.

United States Customs and Border Protection - Chinese Citizenship Encounters						
	2021	2022	2023	2024	2025*	2021 to 2024 % Increase
Accompanied Minors	43	146	206	229	108	432.6
Family Unit Aliens**	249	1,151	6,645	13,081	3,194	5,153.4
Single Adults	23,172	26,447	45,769	65,209	20,289	181.4
UC / Single Minors	7	12	80	182	58	2,500
<b>TOTALS</b>	<b>23,471</b>	<b>27,756</b>	<b>52,700</b>	<b>78,701</b>	<b>23,649</b>	<b>235.3</b>

\*Fiscal Year 2025 data is current as of June 4, 2025

United States Customs and Border Protection's encounters with "single adult" individuals identified with Peoples of Republic of China citizenship increased 181.4 percent (23,172 to 65,209) from fiscal year 2021 to 2024. During that same time frame, encounters with Chinese "family unit aliens" increased 5,153.4 percent (249 to 13,081). However, thus far during fiscal year 2025, specifically the months from January to May, there has been a 66 percent decrease (32,901 to 11,170) in encounters with those identifying as Chinese nationals.

\*\*In the context of the United States government and immigration, a "family unit" is typically defined as a group of two or more aliens, including at least one minor and their parent(s) or legal guardian(s).



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

### Illegal Chinese Labeled Pesticide Fumigants Pose Significant Threat to Human Health and the Environment<sup>[11]</sup>

"In May 2023, Siskiyou County Sheriff notified the California Environmental Protection Agency (CalEPA) about the Chinese labeled pesticides law enforcement and regulatory personnel have been unknowingly encountering at illicit marijuana grows in the unincorporated areas of Siskiyou County. This launched an investigation into these illegal/unregistered foreign pesticide products.

'Health and Safety' samples of various Chinese labeled pesticide products were analyzed by the National Guard's 95<sup>th</sup> Civil Support Team (95<sup>th</sup> CST) and determined to contain a mixture of highly toxic pesticides that pose a significant threat to human health and the environment."<sup>[14]</sup>

"To date, a total of 20 counties in California have discovered these illegal pesticide products at licensed and unlicensed cannabis grows within their respective jurisdictions. In addition to California, these illicit products have been distributed and/or observed in Oklahoma, Washington, Oregon, New Mexico, Maine, Maryland, and New York."<sup>[14]</sup>



"Chinese-labeled pesticide fumigants come in a variety of multi-colored mylar packaging with labels in Chinese writing. These illegal foreign pesticide products consist of individual packets of combustible treated saw dust mixed with small white granules of ammonium nitrate. The sawdust is impregnated with numerous toxic pesticide compounds classified as, but not limited to, carbamates, organophosphates, pyrethroids, and fungicides. These illicit products also contain a packet of "wicks" made up of sulfur and other contaminants. The sawdust is placed in an open container (e.g., an aluminum food or soda can cut in half), and the "wick" is placed in the center."<sup>[14]</sup>

"The 'fumigation cans' are then placed on the ground throughout the hoop house or other enclosed structure and the wicks are lit. As these materials burn, they release highly toxic fumes. The primary routes of exposure are inhalation and dermal contact. To date, a total of twenty-seven (27) pesticides have been identified. Of the twenty-seven (27) pesticides, nine (9) are not registered for use in the United States; none of the pesticides are registered/approved for use as fumigants, and nine (9) are acetylcholinesterase inhibitors (i.e., substances that attack the central nervous system)."<sup>[14]</sup>





## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

### Additional Threats and Environmental Impacts from Illegal Cultivation Activities



Dolan Fire in Big Sur, California (2020) – Started by Marijuana Grower

- “Unpermitted and Improper Storage of Hazardous Materials
- Fire Hazards and Dangers of Wildfires: Destruction of Natural Resources
- Solid Waste Abandonments and Buried Solid Waste (makeshift landfills)
- Soil and Groundwater Contamination
- Water Theft – Increased Impacts Due to Drought
- Additional Impacts include Sewage Waste Discharged into the Ground, Illegal Disposal and Unlawful Incineration of Hazardous Wastes”<sup>[14]</sup>



Overview of Suspected Burn Pit at Illegal Grow



Trash/Debris and Hazardous Waste/Universal Waste

**Law Enforcement Exposure to Active Fumigation** – Following a search warrant on May 13, 2025, in Siskiyou County, California, six law enforcement officers were hospitalized due to their being exposed to active fumigation of Chinese labeled pesticides.<sup>[14]</sup>

Reported Symptoms:

- Skin and throat irritation, chest pain, and persistent headaches<sup>[14]</sup>
- Uncontrollable sweating and nose bleeds – reported within 24 hours of exposure<sup>[14]</sup>
- Extreme fatigue and intermittent nose bleeds were ongoing symptoms subsequent to the exposure<sup>[14]</sup>



NOTE: Due to this being an emerging threat, the information presented is continuously changing as more is learned about the chemical hazards these products present.



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

### Criminal Networks Operate Under Diplomatic and Political Cover

Evidence points to a troubling connection between Chinese marijuana operations and political networks. Criminal groups appear to operate with diplomatic protection at various levels. In 2024 fifty U.S. legislators sent their concerns to then Attorney General Merrick Garland about Chinese nationals with possible ties to the Chinese Communist Party running thousands of illicit marijuana farms across America. <sup>[15]</sup>

**Chinese Diplomat's Visits Raise Red Flags for Law Enforcement** - U.S. officials grew concerned when Consul General Zhu Di visited Oklahoma cultural associations in November 2022 that were under investigation for marijuana trafficking. <sup>[16]</sup> The diplomat met with people who had either pleaded guilty to or faced charges for drug-related crimes. <sup>[16]</sup> "He's meeting with known criminals," said OBN Director Donnie Anderson. <sup>[16]</sup> This fits into China's "framework of influence that covers cultural associations, diaspora groups, and in some cases, organized crime networks," according to human rights organization Freedom House. <sup>[16]</sup>

### Utilization of WeChat by Chinese TCO's



Source: KGW News Oregon

WeChat, a Chinese owned messaging service, launched in 2011, is used by over a billion people in China and 19 million in the United States. <sup>[17][18]</sup>

Evidence shows that WeChat has become a major platform for transnational money laundering, particularly in the illegal drug trades involving fentanyl and marijuana. <sup>[17][19][20][21]</sup>

Additionally, WeChat is used to share intelligence information, secure messages between co-conspirators, and to transmit orders to the TCO's "workers." <sup>[17][22][23]</sup>

Law enforcement investigations have revealed that Chinese underground banking networks, working with Mexican cartels, use WeChat's encrypted messaging to transfer illegal funds across borders. They coordinate cash pickups in U.S. cities and arrange currency swaps between drug traffickers and Chinese money brokers through complex, hard-to-trace transactions. <sup>[17][24][25]</sup>

Multiple cases highlight WeChat's role in drug money laundering. In 2021, Xizhi Li was convicted for running a criminal network using WeChat to coordinate cash movements. <sup>[17][24]</sup> In 2023, "Operation Chem Capture" led to indictments of eight companies and 12 individuals for using WeChat to facilitate illegal fentanyl precursor sales. <sup>[17][25]</sup> Recently, three members of an international money laundering organization were charged in South Carolina for using WeChat in fentanyl money laundering activities. <sup>[17][26]</sup> As one DEA agent stated, "It is all happening on WeChat." <sup>[17][27]</sup>



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES



Dayton Oregon Illegal Marijuana Grow Operation

Source: Yamhill County Sheriff's Office

### Conclusion - Key Takeaways

Chinese criminal networks have established a massive illegal marijuana operation across the United States, generating billions in profits while exploiting trafficked workers and evading law enforcement through sophisticated organizational structures.

- Over 80% of illegal marijuana farms in the U.S. are Chinese-operated, with Oklahoma alone generating \$18-44 billion annually in illicit cannabis revenue.<sup>[1]</sup>
- Chinese nationals are trafficked across the Mexican border and forced into debt bondage, working 14-hour shifts in dangerous conditions without pay.<sup>[10]</sup>
- Criminal networks use straw owners, shell companies, and cultural associations as fronts while maintaining connections to Chinese government officials.<sup>[7]</sup>
- Marijuana profits fund broader criminal enterprises including fentanyl trafficking, with millions being laundered through Chinese money networks.<sup>[1]</sup>
- Law enforcement faces overwhelming challenges due to language barriers, jurisdictional limits, and the sophisticated coordination of these transnational operations, including through the use of WeChat.<sup>[17][19][20][21]</sup>
- The rapid expansion since 2020 demonstrates remarkable adaptability, with operations shifting between states as enforcement pressures change.<sup>[1]</sup>

This represents a critical national security threat requiring coordinated federal response, specialized investigative units, and comprehensive legislative action to close regulatory loopholes that enable these criminal enterprises to operate.



## BRIEFING REPORT: CHINESE NATIONALS AND MARIJUANA IN THE UNITED STATES

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### ARTICLE—"GANGSTERS, MONEY AND MURDER: HOW CHINESE ORGANIZED CRIME IS DOMINATING AMERICA'S ILLEGAL MARIJUANA MARKET"

[The article has been retained in committee files and is available at [https://www.propublica.org/article/chinese-organized-crime-us-marijuana-market.](https://www.propublica.org/article/chinese-organized-crime-us-marijuana-market)]

### ARTICLE—"A DIPLOMAT'S VISITS TO OKLAHOMA HIGHLIGHT CONTACTS BETWEEN CHINESE OFFICIALS AND COMMUNITY LEADERS ACCUSED OF CRIMES"

[The article has been retained in committee files and is available at [https://www.propublica.org/article/oklahoma-marijuana-china-diplomat-visits.](https://www.propublica.org/article/oklahoma-marijuana-china-diplomat-visits)]

ARTICLE—“A MARIJUANA BOOM LED HER TO OKLAHOMA. THEN ANTI-DRUG AGENTS SEIZED HER MONEY AND RAIDED HER HOME”

[The article has been retained in committee files and is available at <https://www.propublica.org/article/marijuana-oklahoma-chinese-immigrant-arrests-asset-seizure-2>.]

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ARTICLE—“INSIDE OUR INVESTIGATION OF CHINA’S INFLUENCE CAMPAIGNS”

[The article has been retained in committee files and is available at <https://www.nytimes.com/2025/08/25/insider/investigating-china.html>.]

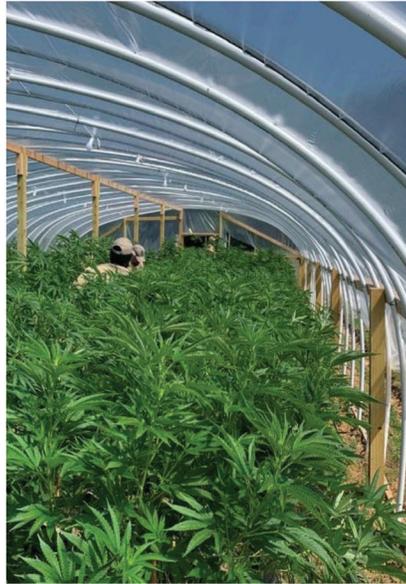
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PHOTOS SUBMITTED BY DONNIE ANDERSON

## Marijuana grow site in Edmond, OK



**Plants in  
different  
phases of  
growth**

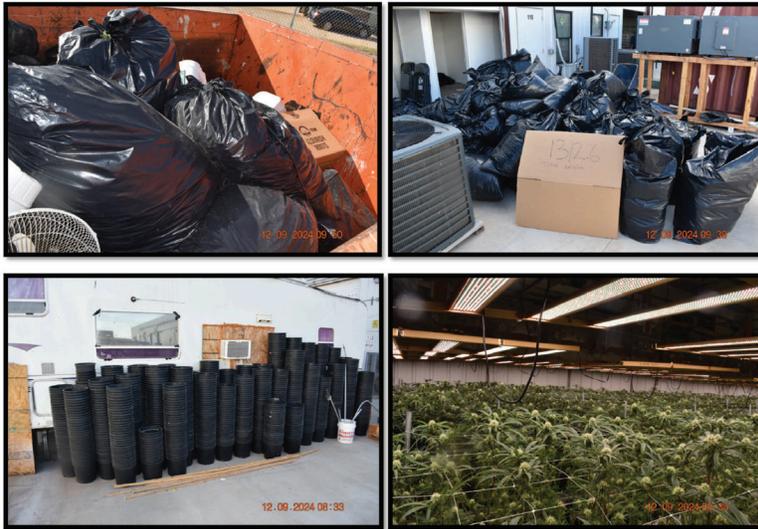




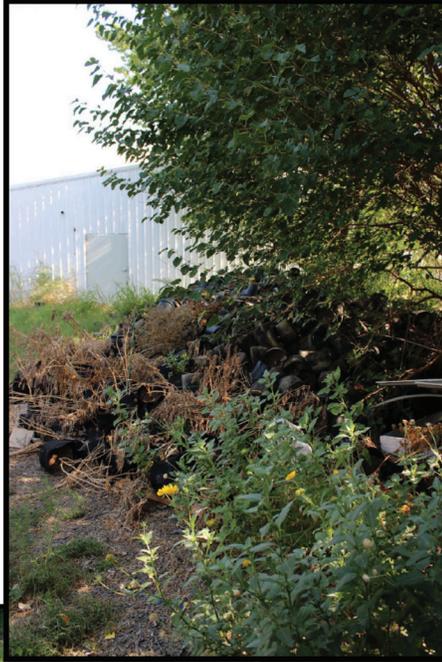
**Molding  
marijuana  
plants**



## Marijuana grow under a straw ownership in Cleveland County, Oklahoma



**Garbage  
and debris  
common to  
marijuana  
grows**





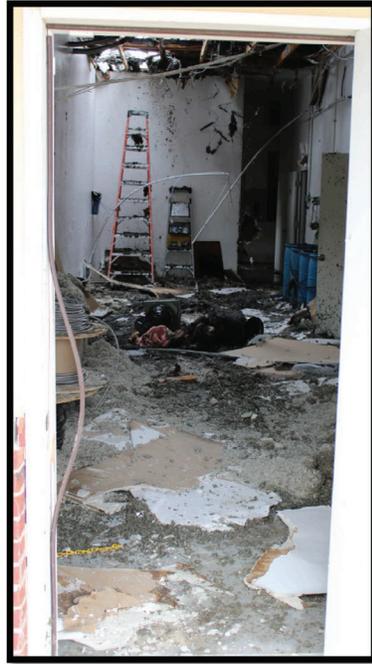
## Marijuana grow site in Edmond





**Example of hazards at grows**





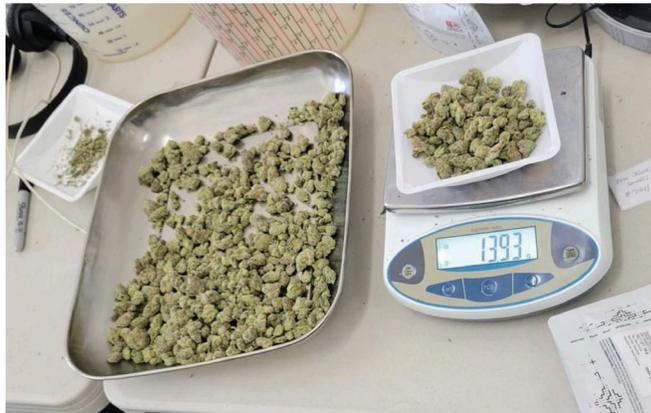


**Guns and  
cash  
found**



## Recovered product





## **Makeshift housing in a tractor trailer**



## Gummies at a grow



## Storage of product



**Product at  
dispensaries**



ARTICLE SUBMITTED BY DONNIE ANDERSON

9/10/25, 2:47 PM

Oklahoma AG Files Charges Against Attorneys Accused Of Helping Illegal Medical Marijuana Grow Operations



NEWS WEATHER

LIVE Tulsa, OK 84°

ELECTION RESULTS

## OKLAHOMA AG FILES CHARGES AGAINST ATTORNEYS ACCUSED OF HELPING ILLEGAL MEDICAL MARIJUANA GROW OPERATIONS

Oklahoma's attorney general announced criminal charges against two Tulsa-based attorneys Wednesday.

Thursday, June 16th 2022, 5:32 pm

By: Jennifer Pierce

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OKLAHOMA CITY -



<https://www.news6.com/story/62ab96f4ad48a9012d0c6b97/oklahoma-ag-files-charges-against-attorneys-accused-of-helping-illegal-medical-marijuana...>

9/10/25, 2:47 PM

Oklahoma AG Files Charges Against Attorneys Accused Of Helping Illegal Medical Marijuana Grow Operations

Oklahoma's attorney general announced criminal charges against two Tulsa-based attorneys Wednesday.

The AG's office accused them of running an illegal medical marijuana scheme that involved hundreds of marijuana grow operations.

Oklahoma Bureau of Narcotics director Donnie Anderson said the charges were a result of a 14-month investigation and multi-county grand jury indictments.

Logan Jones and Eric Brown of the Jones Brown law firm in Tulsa are at the center of the investigation. The OBN was tipped off that the two were illegally obtaining state licenses for out-of-state medical marijuana business owners.

"Directed medical marijuana businesses to sign consulting agreements with Jones Brown's employees who would act as ghost owners of the medical marijuana operations," state attorney general John O'Connor said.

The attorneys charged \$3,000 per year for the "ghost owner" to act as an Oklahoma resident. According to state law, an operation has to be 75 percent owned by a state resident. The false information was filed with the Oklahoma Medical Marijuana Authority and the OBN.

"People are getting these licenses," Anderson said. "On face value, they look legitimate."

But state authorities said red flags went up when Jones and Brown had hundreds of licenses in their name. During the investigation, OBN agents shut down three illegal operations linked back to the law firm.

"They're national and international organizations coming into Oklahoma and setting up shop to exploit our laws," Anderson said. ^

Anderson said the implications of the illegal scheme will be far reaching.

"It doesn't matter what part of this organization you fall under," Anderson said.

"If you participate, if you aid or abet anyone in this operation to further this criminal organization whether laundering money, sex trafficking, human traf-



9/10/25, 2:47 PM

Oklahoma AG Files Charges Against Attorneys Accused Of Helping Illegal Medical Marijuana Grow Operations

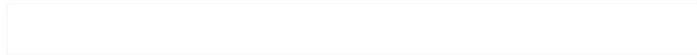
The two attorneys each face eight charges. OBN officials said they have hundreds more cases agents are investigating.



**Jennifer Pierce**



Jennifer Pierce has been on staff with News 9 since 2017. She's an Emmy Award-winning reporter often covering crime in the metro and court cases. A proud member of the Choctaw Nation and a member of the Indigenous Journalists Association, Jennifer also enjoys telling the stories of Native Americans in Oklahoma.



OKLAHOMA COURT RECORDS SUBMITTED BY DONNIE ANDERSON



IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

FILED  
SUPREME COURT BAR DOCKET  
STATE OF OKLAHOMA

STATE OF OKLAHOMA *ex rel.* )  
OKLAHOMA BAR ASSOCIATION )  
Complainant, )  
v. )  
LOGAN MICHAEL JONES, )  
Respondent. )

**Rule 8.1 DISCIPLINARY** DEC 11 2024  
**RESIGNATION** JOHN D. HADDEN  
CLERK

OBAD No. 2490

SCBD No.

**7819**

**APPLICATION FOR ORDER APPROVING  
RESIGNATION PENDING DISCIPLINARY PROCEEDINGS**

COMES NOW the Complainant, State of Oklahoma *ex rel.* Oklahoma Bar Association, by and through General Counsel Gina L. Hendryx, and hereby moves this Honorable Court to enter an Order approving the Resignation Pending Disciplinary Proceedings of LOGAN MICHAEL JONES, OBA No. 30391. In support of this application, Complainant submits the following:

1. Rule 8.2, Rules Governing Disciplinary Proceedings, ("RGDP") 5 O.S. 2021, ch. 1, app. 1-A, provides:

Upon receipt of the required affidavit, the Commission shall file it with the Clerk of the Supreme Court and the Supreme Court may enter an order approving the resignation pending disciplinary proceedings . . .

2. Attached and marked as Exhibit "A", incorporated herein and made a part of this Application, is the affidavit executed by LOGAN MICHAEL JONES stating his free and voluntary resignation from membership in the Oklahoma Bar Association. The

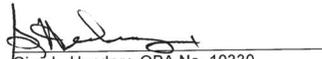
Resignation Pending Disciplinary Proceedings was executed in conformity with the requirements of Rule 8.1, RGDP.

3. The current, official roster address of Respondent, as shown by the records maintained by the Oklahoma Bar Association is 3808 East 51<sup>st</sup> Street, Tulsa, OK 74135.

4. The Complainant has not incurred any costs in the investigation of this matter.

WHEREFORE, premises considered, Complainant, Oklahoma Bar Association, prays that an order be entered approving the Resignation Pending Disciplinary Proceedings executed by LOGAN MICHAEL JONES and make the effective date of the resignation retroactive to the date of its execution.

Respectfully submitted this the 11<sup>th</sup> day of December, 2024.

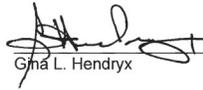


Gina L. Hendryx, OBA No. 10330  
General Counsel  
Oklahoma Bar Association  
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P.O. Box 53036  
Oklahoma City, OK 73152  
(o) 405.416.7083 (f) 405.416.7003  
ginah@okbar.org

ATTORNEY FOR COMPLAINANT

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 11<sup>th</sup> day of December, 2024, service of a true and correct copy of the foregoing Application for Order Approving Resignation Pending Disciplinary Proceedings was made by first-class mail, postage prepaid, to: Gary Rife, Attorney for Respondent, 301 East Eufaula, Norman, OK 73069.

  
Gha L. Hendryx

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

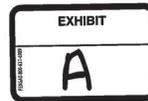
STATE OF OKLAHOMA <i>ex rel.</i>	)	
OKLAHOMA BAR ASSOCIATION	)	<u>Rule 8.1 DISCIPLINARY</u>
	)	<u>RESIGNATION</u>
Complainant,	)	
	)	
v.	)	
	)	SCBD #
LOGAN MICHAEL JONES,	)	
	)	
Respondent.	)	

AFFIDAVIT OF LOGAN MICHAEL JONES REGARDING  
RESIGNATION PENDING DISCIPLINARY PROCEEDINGS

STATE OF OKLAHOMA	)	
COUNTY OF <u>Tulsa</u>	)	ss

LOGAN MICHAEL JONES, of lawful age, comes upon oath and deposes and states:

1. My name is Logan Michael Jones, OBA member ID 30391, and I was admitted to membership in the Oklahoma Bar Association on April 21, 2011. My official Oklahoma Bar Association roster address is 3808 East 51<sup>st</sup> Street, Tulsa, OK 74135. My current bar membership status is active and in good standing.
2. I am submitting this affidavit pursuant to Rule 8.1, Rules Governing Disciplinary Proceedings ("RGDP"), 5 O.S. 2021, ch. 1, app. 1-A.
3. I desire to resign and:
  - (a) I am tendering my resignation freely and voluntarily;
  - (b) I am not being subjected to coercion or duress;



- (c) I am aware of the consequences of submitting this resignation; and,
- (d) I am aware that this resignation is subject to the approval of the Supreme Court of the State of Oklahoma; however, I intend that it be effective from the date and time of its execution, and I will conduct my affairs accordingly.

4. I am aware that a grievance has been filed against me and is being investigated by the Office of the General Counsel, Oklahoma Bar Association, in the following matter:

**DC-22-82:** Grievance alleging that I was charged with 11 felony counts including Count 1: Conspiracy to Defraud the State; Counts 2-7: Offering False or Forged Instrument For record; Counts 8 – 10: Manufacturing CDS,

To Wit: Marijuana; and Count 11: Pattern of Criminal Offenses. On December 2, 2024, I entered a plea of no contest to Counts 1 through 7 and received a 10 year suspended sentence. Counts 8 through 11 were dismissed. See *State of Oklahoma vs. Jones, Logan Michael*, CF-2022-00137, In the District Court In and For Garvin County, Oklahoma.

5. I am aware that, if proven, the allegations concerning my conduct as set forth in the above-referenced grievance, would constitute violations of Rules 8.4(a), 8.4(b), 8.4(c), and 8.4(d) of the Oklahoma Rules of Professional Conduct (ORPC), 5 O.S. 2021, ch. 1, app. 3-A, Rule 1.3, RGDP, and my oath as an attorney.

6. I am aware that the burden of proof regarding the allegations set forth herein rests upon the Oklahoma Bar Association. However, I hereby waive any and all right to contest the allegations.

7. I am aware that, pursuant to Rule 8.2, RGDP, either the approval or disapproval of this resignation is within the discretion of the Supreme Court of Oklahoma.

8. I have familiarized myself with the provisions of Rule 9.1, RGDP, and do hereby agree to comply with all provisions of Rule 9.1 within twenty (20) days following the date of this resignation.

9. I acknowledge and agree I may be reinstated to the practice of law only upon full compliance with the conditions and procedures prescribed by Rule 11, RGDP, and I may make no application for reinstatement prior to the expiration of five (5) years from the effective date of the Order approving this Resignation Pending Disciplinary Proceedings.

10. I acknowledge that, as a result of my conduct, the Client Security Fund may receive claims from my former clients.

11. I agree that, should the Oklahoma Bar Association approve and pay such Client Security Fund claims, I will reimburse the fund the principal amounts and the applicable statutory interest prior to the filing of any application for reinstatement.

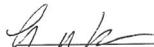
12. I hereby affirm I will tender my Oklahoma Bar Association membership card to the Office of the General Counsel.

13. I acknowledge and agree that I am to cooperate with the Office of the General Counsel in the task of identifying any active client cases wherein documents and files need to be returned or forwarded to new counsel, and in any client case where fees or refunds are owed by me.

14. I acknowledge the Oklahoma Bar Association may have incurred costs in the investigation of this matter and agree that I am responsible to reimburse the same upon the filing of an application to assess costs by the Complainant in this matter.

15. Having so stated and affirmed, I hereby request I be allowed to resign my membership in the Oklahoma Bar Association and relinquish my right to practice law.

AFFIANT FURTHER STATES, under penalty of perjury under the laws of the state of Oklahoma, that the foregoing is true and correct, this the 6<sup>th</sup> day of December, 2024.

  
Logan Michael Jones

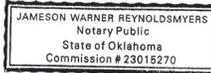
SUBSCRIBED AND SWORN to before me, this 6<sup>th</sup> day of December, 2024, in Tulsa County, Oklahoma.

  
Notary Public

Commission Number: 23015270

My Commission Expires: 11/20/27

(AFFIX SEAL/STAMP)



APPROVED AS TO FORM:

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Oklahoma Bar Association  
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garife@garyrifelaw.com

ATTORNEY FOR RESPONDENT



**ORIGINAL**

2025 OK 1

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA <i>ex rel.</i>	)	FILED
OKLAHOMA BAR ASSOCIATION,	)	SUPREME COURT BAR DOCKET
	)	STATE OF OKLAHOMA
Complainant,	)	JAN 13 2025
v.	)	JOHN D. HADDEN
	)	CLERK
LOGAN MICHAEL JONES,	)	SCBD 7819
Respondent.	)	FOR OFFICIAL PUBLICATION

**ORDER APPROVING RESIGNATION  
PENDING DISCIPLINARY PROCEEDINGS**

¶1 Before this Court is (1) the affidavit of Respondent Logan Michael Jones filed pursuant to Rule 8.1 of the Rules Governing Disciplinary Proceedings (RGDP), 5 O.S.2021, ch. 1, app. 1-A, requesting that this Court allow him to resign his membership in the Oklahoma Bar Association (OBA) and relinquish his right to practice law, and (2) the OBA's Application for Order Approving Resignation Pending Disciplinary Proceedings.

**Decision of the Court**

¶2 On April 21, 2011, the OBA admitted Jones to membership. On December 11, 2024, Jones filed with this Court his affidavit of resignation pending disciplinary proceedings.

Rec'd (date)	1-13-25
Posted	JM
Mailed	JM
Distrib.	JM
Publish	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no

¶3 Jones's affidavit of resignation reflects that (a) he freely and voluntarily renders his resignation, (b) he was not subject to coercion or duress, and (c) he is fully aware of the consequences of submitting his resignation.

¶4 Jones is aware the OBA opened an investigation into a grievance filed against him in the following matter:

DC-22-82: A grievance regarding eleven felony charges brought against Jones, including Count 1: Conspiracy to Defraud the State; Counts 2-7: Offering False or Forged Instrument for Record; Counts 8-10: Manufacturing CDS, To Wit: Marijuana; and Court 11: Pattern of Criminal Offenses. On December 2, 2024, Jones entered a plea of no contest to Counts 1 through 7 and received a 10-year deferred sentence. Counts 8 through 11 were dismissed. *See State of Oklahoma v. Jones, Logan Michael*, CF-2022-00137, in the District Court of Garvin County, Oklahoma.

¶5 Jones is aware that these allegations, if proven, would constitute at a minimum a violation of Rules 8.4(a), 8.4(b), 8.4(c), and 8.4(d) of the Oklahoma Rules of Professional Conduct (ORPC), 5 O.S.2021, ch. 1, app. 3-A, and Rule 1.3 of the RGDP, as well as his oath as an attorney.

¶6 Jones's affidavit of resignation further states:

- a. Jones is aware that the OBA has the burden of proving the allegations against him, but he waives any and all rights to contest the allegations.
- b. He is aware that approval of his resignation is discretionary with this Court.
- c. He is familiar with and agrees to comply with Rule 9.1 of the RGDP within twenty (20) days following the date of his resignation, to comply with

Rule 11 of the RGDP as a prerequisite to reinstatement, and to make no application for reinstatement prior to the expiration of five (5) years from the effective date of his resignation.

d. He acknowledges that the Client Security Fund may receive claims from his former clients and agrees to reimburse the fund for the principal amounts and statutory interest for claims that it approves and pays as a prerequisite to his reinstatement to the practice of law.

e. He acknowledges and agrees to cooperate with the Office of General Counsel in the task of identifying any active client cases wherein documents and files need to be returned or forwarded to new counsel and to cooperate in any client cases where Jones owes fees or refunds.

f. He acknowledges that the OBA has not incurred any costs in the investigation of this matter.

g. He will tender his OBA membership card to the Office of the General Counsel.

¶7 We determine the effective date of Jones's resignation to be January 13, 2025.

¶8 This Court finds Jones's resignation pending disciplinary proceedings is in compliance with all the requirements outlined in Rule 8.1 of the RGDP and is accepted.

¶9 Jones's OBA number is 30391, and his official roster address, as shown by OBA records, is 3808 East 51st Street, Tulsa, Oklahoma 74315.

¶10 IT IS THEREFORE ORDERED that the OBA's Application for Order Approving Resignation Pending Disciplinary Proceedings is approved.

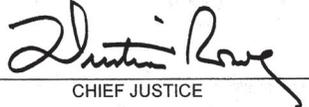
¶11 IT IS FURTHER ORDERED that Jones's name be stricken from the Roll of Attorneys and that he make no application for reinstatement to membership in the OBA prior to the expiration of five (5) years from the effective date of his resignation. See RGDP Rules 8.2 and 11.1.

¶12 IT IS FURTHER ORDERED that Jones comply with Rule 9.1 of the RGDP, return all client files, and refund unearned fees.

¶13 IT IS FURTHER ORDERED that as a condition of reinstatement, Jones shall reimburse the Client Security Fund for any monies expended because of his malfeasance or nonfeasance. See RGDP Rule 11.1(b).

¶14 IT IS FURTHER ORDERED that the OBA has not sought reimbursement of costs associated with the investigation of this matter, and therefore, no reimbursement is ordered.

DONE BY ORDER OF THE SUPREME COURT IN CONFERENCE this  
13th day of January, 2025.

  
CHIEF JUSTICE

CONCUR: ROWE, C.J., KUEHN, V.C.J., WINCHESTER, EDMONDSON, COMBS  
(BY SEPARATE WRITING), GURICH, DARBY, AND KANE, J.J.



ORIGINAL

2025 OK 1  
IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA ex rel. )  
OKLAHOMA BAR ASSOCIATION, )  
Complainant, )  
v. )  
LOGAN MICHAEL JONES, )  
Respondent. )

FILED  
SUPREME COURT BAR DOCKET  
STATE OF OKLAHOMA  
JAN 13 2025  
JOHN D. HADDEN  
CLERK

SCBD No. 7819

Rec'd (date)	1-13-25
Posted	JM
Mailed	JM
Distrib.	JM
Publish	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no

COMBS, J., concurring specially:

¶1 I concur in the approval of Respondent's resignation pending disciplinary proceedings pursuant to Rule 8.2 of the Rules Governing Disciplinary Proceedings (RGDP), 5 O.S.2021, ch. 1, app. 1-A. I write separately to express my surprise at the Bar Association's decision not to file a Rule 6 disciplinary proceeding against Respondent so that it could seek an emergency interim suspension of Respondent's license to practice law pursuant to Rule 6.2A of the RGDP, 5 O.S.2021, ch. 1, app. 1-A.<sup>1</sup> Instead, it appears from the date of the grievance (i.e., Grievance

<sup>1</sup> This matter wasn't even commenced as a Rule 7 disciplinary proceeding, even though it was filed shortly after Respondent's change of plea in his criminal case on December 2, 2024, see Plea of Nolo Contendere 1, *State v. Jones*, No. CF-2022-0137 (Garvin Cty. Dist. Ct. filed Dec. 2, 2024). The Bar Association initiated this matter on December 11, 2024, as a Rule 8 disciplinary proceeding when it filed its Application for Order Approving Resignation Pending Disciplinary Proceedings. The matter was presumably handled this way because the State made the "surrender

No. DC-22-82, meaning it was filed in 2022) that the Bar Association sat on this matter for two years, essentially giving Respondent the opportunity to continue practicing law for those two years despite his indictment by a multicounty grand jury for crimes demonstrating dishonesty and unfitness to practice law (i.e., six felony counts of offering false or forged instruments for recordation in violation of 21 O.S.2021, § 463).<sup>2</sup> It also appears Respondent took advantage of that opportunity to

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[of Respondent's] law license by 12/9/24" a condition of his plea agreement. *See id.* at 5. It is unclear whether that aspect of the plea agreement was included at the behest of the Bar Association or not. Regardless, the prosecutorial authorities in the criminal case do not have the prerogative to dictate what happens to a convicted attorney's license to practice law. That power lies in this Court. "The maintenance of strict integrity among the members of our bar is one of this Court's constitutional, non-delegable duties," *State ex rel. OBA v. Gassaway*, 2008 OK 60, ¶ 3, 196 P.3d 495, 498 (citing *State ex rel. OBA v. Colston*, 1989 OK 74, ¶ 19, 777 P.2d 920, 925), and this Court should not abdicate its disciplinary authority or duties in favor of the Attorney General's Office or local district attorneys.

<sup>2</sup> Rule 8.4(b) of the Oklahoma Rules of Professional Conduct (ORPC), 5 O.S.2021, ch. 1, app. 3-A, provides that "[i]t is professional misconduct for a lawyer to: . . . (b) commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects." Comment 2 to Rule 8.4 further states that "[m]any kinds of illegal conduct reflect adversely on fitness to practice law, *such as offenses involving fraud* . . . . Although a lawyer is personally answerable to the entire criminal law, *a lawyer should be professionally answerable only for offenses that indicate lack of those characteristics relevant to law practice. Offenses involving violence, dishonesty, breach of trust, or serious interference with the administration of justice are in that category. A pattern of repeated offenses, even ones of minor significance when considered separately, can indicate indifference to legal obligation.*" ORPC 8.4 cmt. 2, 5 O.S.2021, ch. 1, app. 3-A (emphasis added). Here, the offenses set forth in Respondent's indictment involve fraud and dishonesty and demonstrate a repeated pattern that indicates Respondent's indifference to legal obligation.

practice law on several occasions since his indictment in June of 2022.<sup>3</sup> If our goals truly are “to protect the interests of the public and to preserve the integrity of the courts and the legal profession,” *State ex rel. OBA v. Abdoveis*, 2024 OK 55, ¶ 7, 551 P.3d 320, 326, then the Bar Association should have asked this Court to suspend Respondent’s license two years ago.

¶ 2 I also have grave concerns regarding the status of any disciplinary action against Respondent’s co-defendant, Eric Brandon Brown, who is also an attorney licensed to practice law in Oklahoma. At the same time Respondent was indicted, Mr. Brown was indicted for the very same crimes. At this point, it appears his criminal case has already concluded and been expunged.<sup>4</sup> That shouldn’t

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<sup>3</sup> See, e.g., Def.’s Answer & Affirmative Defenses to Pl.’s Compl. 3, *Citibank, N.A. v. Rosser*, No. CJ-2024-0081 (Custer Cty. Dist. Ct. filed Sept. 27, 2024) (the appearance docket for this matter reveals Respondent advised the judge on December 2, 2024—the same day Respondent entered the *nolo contendere* plea in his criminal case!—that this matter had settled); Def.’s Answer & Affirmative Defenses to Pl.’s Compl. 3, *Tinker Fed. Credit Union v. Johns*, No. CJ-2024-0278 (Comanche Cty. Dist. Ct. filed Aug. 26, 2024) (the appearance docket for this matter reveals the parties submitted an agreed journal entry resolving this case in September of 2024); Def.’s Answer & Affirmative Defenses to Pl.’s Compl. 4, *Am. Express Nat’l Bank v. Shipley*, No. CS-2024-1105 (Canadian Cty. Dist. Ct. filed Aug. 29, 2024).

<sup>4</sup> A search of OSCN does not return any criminal cases for Mr. Brown. The State filed two criminal cases against Respondent, i.e., *State v. Jones*, No. CF-2022-0137 (Garvin Cty. Dist. Ct. filed June 16, 2022), and *State v. Jones*, No. CF-2022-0138 (Garvin Cty. Dist. Ct. filed June 16, 2022). Case Nos. CF-2022-0139 and CF-2022-0140, which would have been filed the same day in Garvin County District Court, seem to have been expunged because they no longer exist. Those case numbers presumably concerned Mr. Brown.

necessarily mean that he is immune from professional discipline pursuant to Rule 6 of the RGDP. Yet he has continued to practice law with impunity ever since his indictment in June of 2022.<sup>5</sup> The Bar Association should have filed a Rule 6

<sup>5</sup> By my count, Mr. Brown has appeared in thirty-eight cases since his indictment in June of 2022, **including one appearance in the same county where his criminal case presumably was pending**. See Pet. 3, *Puente-Martinez v. Rivera*, No. CJ-2024-4050 (Tulsa Cty. Dist. Ct. filed Oct. 25, 2024); Pet. for Personal Injury 3, *Watkins v. Estate of Bean*, No. CJ-2024-0220 (Bryan Cty. Dist. Ct. filed Oct. 15, 2024); Pet. for Letters of Admin., Appointment of Personal Rep. & for Determination of Heirs at Law 2, *In re Estate of Walton*, No. PB-2024-0023 (Coal Cty. Dist. Ct. filed Sept. 3, 2024); Pet. 2, *Shannon v. Johnson*, No. CJ-2024-3694 (Okla. Cty. Dist. Ct. filed June 6, 2024); Pet. for Interpleader 2, *Juarez Reyes v. Stillwater Med. Ctr. Auth.*, No. CJ-2024-0278 (Payne Cty. Dist. Ct. filed May 15, 2024); Pet. 3, *Jones v. Wooley*, No. CJ-2024-0213 (Comanche Cty. Dist. Ct. filed Apr. 26, 2024); Pet. 3, *Bowen v. Dillahunty*, No. CJ-2024-0002 (Greer Cty. Dist. Ct. filed Mar. 20, 2024); Pet. for Letters of Admin., Appointment of Personal Rep. & for Determination of Heirs at Law 3, *In re Estate of Tate*, No. PB-2023-0150 (Carter Cty. Dist. Ct. filed Nov. 17, 2023); Pet. 3, *Garcia v. Kauffman*, No. CJ-2023-3402 (Tulsa Cty. Dist. Ct. filed Sept. 22, 2023); Pet. for Ct. Restricted Minor Account 2, *Machado Moreno ex rel. D.Y.E.M. v. Old Am. Indem. Co.*, No. CS-2023-5028 (Tulsa Cty. Dist. Ct. filed Sept. 21, 2023); Pet. for Personal Injury & Wrongful Death 3, *Gonzalez-Lopez v. Britton*, No. CJ-2023-3365 (Tulsa Cty. Dist. Ct. filed Sept. 21, 2023); Pet. for Personal Injury 3, *Weary v. Tinnin*, No. CJ-2023-5352 (Okla. Cty. Dist. Ct. filed Sept. 18, 2023); Pet. 2, *Verde Posas ex rel. J.M. v. Kurin*, No. CJ-2023-3197 (Tulsa Cty. Dist. Ct. filed Sept. 7, 2023); Pet. for Interpleader 2, *Gil v. EMSA*, No. CJ-2023-3188 (Tulsa Cty. Dist. Ct. filed Sept. 6, 2023); Pet. 2, *Camacho Viruete ex rel. J.C.C. v. Rogers*, No. CJ-2023-3186 (Tulsa Cty. Dist. Ct. filed Sept. 6, 2023); Pet. for Personal Injury 3, *Radford v. Woodcrest Tavern*, No. CJ-2023-0145 (Logan Cty. Dist. Ct. filed July 11, 2023); Pet. for Personal Injury 3, *Mamah v. Skonezny*, No. CJ-2023-2361 (Tulsa Cty. Dist. Ct. filed July 10, 2023); Pet. for Personal Injury 3, *Lovings v. Ashley*, No. CJ-2023-3546 (Okla. Cty. Dist. Ct. filed June 27, 2023); Pet. for Letters of Admin., Appointment of Personal Rep. & for Determination of Heirs at Law 2-3, *In re Estate of Brockman*, No. PB-2023-0068 (Creek Cty. Dist. Ct. filed June 19, 2023); Pet. 3, *Bradford v. Brierton*, No. CJ-2023-2762 (Okla. Cty. Dist. Ct. filed May 15, 2023); Pet. for Personal Injury 3, *Anderson v. Aguilar Regalado*, No. CJ-2023-2769 (Okla. Cty. Dist. Ct. filed May 15, 2023); Pet. 3, *Clemons v. Hernandez*, No. CJ-2023-0304

disciplinary proceeding against Mr. Brown and sought his interim suspension pursuant to Rule 6.2A of the RGDP; and if circumstances developed to suggest that Mr. Brown should not be subject to ultimate discipline, the Bar Association could have so informed this Court. As it stands, we are left to wonder what, if anything, has transpired.

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(Canadian Cty. Dist. Ct. filed May 1, 2023); Pet. for Letters of Admin., Appointment of Personal Rep. & for Determination of Heirs at Law 3, *In re Estate of Moore*, No. PB-2023-0043 (**Garvin Cty. Dist. Ct. filed Apr. 3, 2023**); Pet. for Personal Injury 3, *Martinez v. Troutt*, No. CJ-2023-1143 (Tulsa Cty. Dist. Ct. filed Mar. 31, 2023); Pet. for Personal Injury 3, *Farrell v. Merz*, No. CJ-2023-1359 (Okla. Cty. Dist. Ct. filed Mar. 13, 2023); Pet. 3, *Stinchcomb v. Rotramel*, No. CJ-2023-0811 (Tulsa Cty. Dist. Ct. filed Mar. 9, 2023); Pet. 3, *Wamego v. Steed*, No. CJ-2023-0675 (Tulsa Cty. Dist. Ct. filed Feb. 27, 2023); Pet. 3, *Karloh v. Hopper*, No. CJ-2023-0421 (Tulsa Cty. Dist. Ct. filed Feb. 3, 2023); Pet. 3, *Wilkerson v. Morrison*, No. CJ-2022-3634 (Tulsa Cty. Dist. Ct. filed Nov. 30, 2022); Pet. 3, *Hayes v. Ivy*, No. CJ-2022-3612 (Tulsa Cty. Dist. Ct. filed Nov. 29, 2022); Entry of Appearance 1, *State Farm Mut. Auto. Ins. Co. v. Moffett*, No. CV-2022-0157 (Delaware Cty. Dist. Ct. filed Nov. 8, 2022); Pet. 3, *Carroll v. Wigginton*, No. CJ-2022-0405 (Rogers Cty. Dist. Ct. filed Nov. 4, 2022); Pet. 3, *Rhodes v. Huddleston*, No. CJ-2022-5414 (Okla. Cty. Dist. Ct. filed Nov. 3, 2022); Pet. for Letters of Admin., Appointment of Personal Rep. & for Determination of Heirs at Law 3, *In re Estate of Barrett*, No. PB-2022-1106 (Tulsa Cty. Dist. Ct. filed Oct. 20, 2022); Final Accounting & Req. for Discharge as Personal Rep. 3, *In re Estate of Lemay*, No. PB-2020-0021 (Okfuskee Cty. Dist. Ct. filed Oct. 12, 2022); Pet. 3, *Salinas-Chavez v. Cole*, No. CJ-2022-2777 (Tulsa Cty. Dist. Ct. filed Sept. 8, 2022); Pet. for Personal Injury 3, *Jennings v. Rodriguez-Torres*, No. CJ-2022-0085 (Ottawa Cty. Dist. Ct. filed July 28, 2022); Pet. 3, *Olvera-Patlan v. Chard*, No. CJ-2022-3560 (Okla. Cty. Dist. Ct. filed July 26, 2022).



## APPENDIX II

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STATEMENT OF ALEXANDER B. GRAY, CEO, AMERICAN GLOBAL STRATEGIES,  
SUBMITTED BY CHAIRMAN JOSH BRECHEEN

Chairman Brecheen, Ranking Member Thanedar, and Members of the committee, thank you for allowing me to submit remarks for the record on a topic of such exceptional importance to American national and economic security.

I have spent the majority of my professional career focused on issues of national security and foreign policy, primarily at the Federal level. Most recently, I served as deputy assistant to the President and chief of staff of the White House National Security Council (NSC) from 2019 to 2021. Earlier, I served as special assistant to the President for the defense industrial base at the White House National Economic Council (NEC) and as director for Oceania & Indo-Pacific security at the NSC. I am also a fourth-generation Oklahoman, who cares deeply about the safety of my home State.

During my tenure at the White House, I had a front-row seat to the efforts the CCP is undertaking, in the United States and around the world, to subvert governments and societies and seek to gain economic, political, and military advantage. Unfortunately, in just the time since I left public service in January 2021, the threat posed by the CCP to the United States has only grown. The CCP threat is no longer only a distant military and cyber threat in the Indo-Pacific but is now one that involves substantial personal and economic risks to American citizens, at home.

As Americans ponder their response to the CCP's predations, it is essential to understand the reality that no company or entity in China is truly private, in the sense that Americans would understand it. Beijing exerts top-down control over all Chinese companies and commercial enterprises, regardless of whether the State officially owns a stake in the company or not. In fact, this is enshrined in China's legal system. China has numerous national security laws that require all businesses and individuals to use their resources to support the CCP if called upon to do so in support of China's security apparatus and strategic objectives. In essence, if a Chinese citizen or company fails to assist the CCP, they are actually violating the law.

Given the implications of this top-down authoritarian business environment, we must recognize that when it comes to Chinese-owned businesses, all roads lead to Beijing. Recently, we have seen an uptick in agricultural land purchases in the United States by Chinese-linked entities. This represents a grave threat to rural communities and to the whole country who depend on American agriculture. Already, hundreds of thousands of acres of American farmland have been bought up by Chinese entities, often through a maze of shell companies and LLCs. If we even just take one step back from the immediate national security risk, we can also see the immense risk to State economies and to America's economic security if the land our food is grown and raised on is controlled by a foreign adversary. Though restrictions on foreign land purchases exist at the Federal level, they have proven incredibly difficult to enforce, as shell companies and difficult-to-trace entities continually pop up to aid in these transactions. Additional measures are needed, including greater collaboration between the Federal Government and State governments, to ensure that American farmland stays in the hands of American farmers, protecting both our national and economic security.

CCP leaders are constantly prodding to identify opportunities to bring a potential conflict to the U.S. homeland. In 1999, two senior Chinese colonels wrote "Unrestricted Warfare," which took stock of perceived American weaknesses in a potential conflict between China and the United States. They described a new kind of conflict in which "all the boundaries lying between the two worlds of war and non-war, of military and non-military, will be totally destroyed, and it also means that many of the current principles of combat will be modified, and even that the rules of war may need to be rewritten." They note the vulnerability of the U.S. homeland, specifi-

cally to economic coercion and even biological attacks and lay out a series of spheres in which the United States has failed to focus sufficient attention. Twenty-five years and voluminous examples later, the United States should take the CCP at its word and understand that a potential conflict with China would indeed be “unrestricted” and the U.S. homeland would not be off-limits.

In wartime, CCP depredations facing the homeland could include cyber attacks on critical infrastructure, producing significant damage to civilian populations. These attacks could also include disruption of the food supply facilitated by CCP control of key pieces of agricultural land across the United States, and traditional sabotage operations. With the Federal Government focused on a conventional conflict in the Indo-Pacific of unprecedented scale and scope, States and localities will be forced to address these challenges at home with limited Federal resources. It is incumbent upon policy makers, in Washington, including Congress, to begin the hard work of educating their constituents and hardening their jurisdictions against the CCP’s unrestricted warfare.

We are currently giving our chief geopolitical adversary and economic rival critical leverage over our country and its citizens. As tensions rise so do the risks. If a war, or even a low-intensity conflict were to break out between China and the United States in the far-away seas and islands of the Pacific, very quickly, Americans would realize this conflict is not so far away at all. Beijing would no doubt use every available tool they can, including their “private” companies in the United States to harm our economy and our citizens. It has become apparent that our country needs a national strategy and response to sufficiently protect American citizens and keep our economy secure.

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SUPPLEMENTAL MATERIAL SUBMITTED BY STEVEN ROBINSON, EDITOR-IN-CHIEF, THE MAINE WIRE; DIRECTOR, “HIGH CRIMES: HOW CHINESE MAFIA TOOK OVER RURAL AMERICA”

*Re: PRC-linked illicit cannabis and trafficking networks in Maine and New England*

Chairman BRECHEEN: Chinese human-trafficking and drug-trafficking networks have exploited cannabis laws and lax enforcement in New England to grow and distribute vast quantities of marijuana nationwide. The foreign drug trafficking organizations have imposed heavy costs on law-abiding Americans forced to live beside ruthless organized crime. In Maine we have documented murder,<sup>1</sup> human and sex trafficking,<sup>2</sup> dangerous neurotoxic chemicals at grow sites,<sup>3</sup> and fraud/financial crimes tied to black-market Chinese drug gangs.<sup>4</sup> We have also identified clear, concrete connections between Chinese cartels operating in Maine and Chinese Communist Party (CCP) United Front-aligned associations—including at drug properties within walking distance of a U.S. military facility.<sup>5 6</sup>

These conclusions arise from 2 years of reporting at *TheMaineWire.com* and my documentary *High Crimes: How Chinese Mafia Took Over Rural America*. Across Maine and New England we identified a sprawling, inter-State network of illicit cultivation and trafficking infrastructure. Subsequent county and Federal actions now corroborate 5 core truths: (1) these are interconnected networks, not isolated houses; (2) the networks are run by Chinese drug organizations with ties to PRC-aligned associations; (3) they rely on human trafficking and sophisticated money laundering coordinated using WeChat and front organizations; (4) most illicit cannabis grown in Maine is shipped out of State into eastern U.S. markets exploiting the so-called “Hemp Loophole;” and (5) the phenomenon is wrecking housing stock, poisoning markets and consumers with illicit pesticides, undermining small businesses that

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<sup>1</sup> Steve Robinson, “Suspect Arrested in Connection with Homicide Tied to Chinese Gang’s Marijuana Grow in Turner,” *The Maine Wire*, January 7, 2025.

<sup>2</sup> Edward Tomic, “Numerous Chinese Massage Parlors in Maine, Some Run by Illegal Aliens, Busted for Sex Trafficking,” *The Maine Wire*, April 18, 2025.

<sup>3</sup> Steve Robinson, “Illicit Chinese Toxins Discovered at Somerset County Triad Cannabis Operation,” *The Maine Wire*, March 4, 2025.

<sup>4</sup> Steve Robinson, “New York Men Strike Plea Deals Over Bank Fraud Conspiracy Tied to Chinese Cannabis Cartels in Maine,” *The Maine Wire*, September 3, 2025.

<sup>5</sup> Steve Robinson, “Illicit Marijuana Grow Near U.S. Army Base in Maine Tied to Chinese Communist Party’s NYC Consulate,” *The Maine Wire*, May 15, 2024.

<sup>6</sup> Philip Lenczycki, “DCNF EXCLUSIVE: Web Of Illegal Marijuana Grows Tied To Chinese Communist Party Front Group,” *The Maine Wire* (repub.), May 1, 2025.

try to operate legally, and creating a culture of lawlessness that is forcing Mainers to either go bankrupt or embrace the same illegal behavior.<sup>7 8</sup>

Our investigation began when a leaked Department of Homeland Security (DHS) assessment identified approximately 270 Maine properties tied to Asian transnational criminal organizations, many along the I-95 corridor used for cash, narcotics, and the movement of illegal aliens from China. That July 2023 memo drastically underestimated the foothold Chinese organized crime has since established in Maine. Our investigation mapped these properties and probed the common ownership, financing, and operational links among them.<sup>9</sup> Our investigation had found more than 350 Maine properties connected to the Chinese drug cartels, including residential and commercial facilities converted to marijuana growing, boarding houses for illegal alien workers, cash stash houses and seemingly legitimate business fronts. These include a former church in Wynn, a former middle school in Mattawamkeag, a doctor's office in Fayette, a shoe factory in Wilton, a sardine cannery in Eastport, and hundreds of houses that no longer belong to middle-class Maine families or business owners.

Operationally, the same electricians, lenders, straw owners, and “helpers” appear repeatedly at different sites; WeChat functions as the nervous system for procurement, logistics, payments, and the distribution of illicit fumigant chemicals; and restaurants, seafood ventures, massage parlors, and other cash-intensive businesses serve as fronts to commingle funds and provide camouflage.<sup>10 11 12 13</sup>

The networks also exhibit demonstrable ties to PRC-aligned organizations. At a Dexter, Maine, site less than a mile from a U.S. Army Reserve facility, we found apparel linking the location to the Sijiu Association of New York, an overseas-Chinese civic group documented as working with the PRC consulate and United Front entities. Subsequent reporting identified Sijiu officials—one a senior leader—as among Chinese traffickers arrested in Maine.<sup>5 6</sup>

Human trafficking and money laundering are integral to the model. In July 2025, the U.S. Attorney for the District of Massachusetts charged 7 Chinese nationals in a multi-million-dollar cultivation, distribution, laundering, and alien-smuggling enterprise spanning Massachusetts and Maine—alleging smuggled Chinese laborers whose passports were withheld until smuggling debts were repaid, bulk cash logistics, and laundering into real estate and luxury goods.<sup>7</sup> According to the indictment, these ringleaders were reading our reporting from the very first article we published exposing Chinese organized crime in Maine. Parallel to labor trafficking, Maine police have exposed sex- and labor-trafficking at Chinese-run massage parlors in Rockland, Lewiston, Portland, and Ellsworth, including cases involving illegal aliens, forced labor, recording equipment, cash hoards, coercion, and deceptive recruitment via Chinese-language job boards.<sup>2</sup>

Most illicit cannabis grown in Maine leaves the State. Maine Office of Cannabis Policy (OCP) Director John Hudak told lawmakers that individuals tied to these networks seek State medical licenses as “Get-Out-of-Jail-Free” cards to shield ongoing illegal operations—“by and large, directing product out-of-State.”<sup>8</sup> As with cannabis cultivation in California and Oklahoma, the sheer volume alone is enough to infer that the cannabis is being sold and consumed mostly out-of-State, with evidence mounting in prohibition States that black-market cannabis is being sold as “hemp” at tobacco shops and head shops throughout the United States.

The social, cultural, and economic toll is acute. Chinese-controlled conversions destroy housing stock: once purchased, properties are removed from the market and frequently ruined by black mold, neurotoxic chemicals, and heavy abuse. We documented a Maine family who developed respiratory symptoms after touring a Mon-

<sup>7</sup> U.S. Attorney's Office, District of Massachusetts, “Seven Chinese Nationals Charged for Alleged Roles in Multi-Million-Dollar Money Laundering, Alien Smuggling and Drug Trafficking Enterprise,” press release, July 9, 2025.

<sup>8</sup> Steve Robinson, “Maine Pot Czar Admits State Is Licensing Foreign Criminal Orgs to Grow Cannabis, Says Hands Tied,” *The Maine Wire*, January 15, 2025.

<sup>9</sup> Jennie Taer, “EXCLUSIVE: Illegal Chinese Marijuana Grow Operations Are Taking Over Blue State, Leaked Memo Says,” *Daily Caller News Foundation*, August 16, 2023; and Steve Robinson, “Triad Weed: How Chinese Marijuana Grows Took Over Rural Maine,” *The Maine Wire*, November 8, 2023.

<sup>10</sup> Steve Robinson, “The Triad's Electrician: Meet the 87-Year-Old ‘Frontman’ for Chinese Marijuana Grows in Maine,” *The Maine Wire*, April 16, 2024.

<sup>11</sup> Steve Robinson, “The Restaurateur: Bangor Business Owner Linked to Illicit Marijuana Grows,” *The Maine Wire*, May 16, 2024.

<sup>12</sup> Steve Robinson, “Welcomed to Maine by LePage, Eastport Seafood Biz Devolved Into Illicit Marijuana Trafficking Operation with Ties to Hong Kong,” *The Maine Wire*, May 8, 2024.

<sup>13</sup> Steve Robinson, “Illegal Chinese Neurotoxins Are Coming to Maine's Black-Market Cannabis Grows: Maine Threat Brief,” *The Maine Wire*, August 29, 2024 (on WeChat-based logistics and payments).

mouth property used as a shipping node for Chinese-made pesticides; the listing was quietly pulled after our reporting. Many converted properties present serious risks of electrical fires, chemical exposure, and carbon-monoxide or propane poisoning due to uninspected equipment and bypassed meters.<sup>14 15 16</sup>

Illicit Chinese fumigants and pesticides (including organophosphates and novel blends) are being imported and applied in unregulated grows. Most cannabis testing panels in Maine do not screen for many of these agents, meaning contaminated product can pass “safety” screens; meanwhile, warrant executions frequently occur without hazmat protocols, exposing officers to unknown chemical threats. The result is adulterated cannabis moving along this interstate pipeline to end-users throughout the eastern United States.<sup>3</sup>

Maine’s legal cannabis businesses are being undercut by foreign criminal organizations that flood supply, evade taxes and compliance costs, pay illegal wages, and launder profits into more properties—collapsing legitimate margins and pushing local operators toward insolvency.<sup>17</sup> The enterprise also leverages illegal border crossings, asylum claims, and permissive identity regimes to move both workers and money; in February 2024, 3 Chinese nationals were caught illegally entering Maine from Canada, and our records work has documented Chinese nationals obtaining out-of-State driver’s licenses and surfacing repeatedly in Maine property records tied to grows.<sup>18 19</sup>

Maine’s experience is now a case study in how PRC-linked criminal networks exploit U.S. real estate, financial blind spots, and regulatory seams; convert homes into industrial drug sites; export the product to neighboring States; and leave Mainers with gutted houses, fires, toxic residues, and collapsing lawful markets. The record is no longer anecdotal; it is documented, cross-corroborated, and charged in Federal court.<sup>7</sup>

Thank you for your leadership and for the opportunity to place this record before the subcommittee. I am available to brief staff, provide property-level datasets, and connect you with Maine’s long-suffering cannabis entrepreneurs. I am also submitting, for the record, copies of our investigative work detailing the individuals, businesses, and financial institutions implicated in this conspiracy.



<sup>14</sup> Steve Robinson, “Maine Family Sickened After Exposure to Illicit Cannabis House Linked to Chinese-Made Toxins,” *The Maine Wire*, December 5, 2024.

<sup>15</sup> Steve Robinson, “At Rural Maine Marijuana Grow, Cops Find Asian Passports, Plane Tickets from China, and Stolen Electricity,” *The Maine Wire*, January 8, 2024.

<sup>16</sup> Dylan Tusinski, “How Cheap Weed from ‘Gray Market’ Growers Ends Up on Maine Dispensary Shelves,” *Portland Press Herald*, August 17, 2025 (market harms and undercutting).

<sup>17</sup> Steve Robinson, “Three Chinese Nationals Caught Sneaking Into Maine from Canada Amid Asian Organized Crime Epidemic,” *The Maine Wire*, February 28, 2024.

<sup>18</sup> Steve Robinson, “Sheriff Docs Show Chinese Illegal Aliens Got NY Drivers Licenses Before Carbon Monoxide Poisoning in Freedom,” *The Maine Wire*, July 22, 2025; and Steve Robinson, “Maine Cops Warn BMV Issuing Driver’s Licenses to Individuals with Bogus Social Security Numbers,” *The Maine Wire*, May 30, 2024; and Steve Robinson, “Chinese Impostor Points Up Mortgage Scheme Leveraged by Cannabis Cartels in Maine,” *The Maine Wire*, August 27, 2025.

<sup>19</sup> [Sic]