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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. LIZHEN CHEN, Defendant.	CASE NO. 2:96-CR-0350-13 WBS GOVERNMENT'S MOTION TO DISMISS SPECIFIC COUNTS OF THE SUPERSEDING INDICTMENT AND [PROPOSED] ORDER DISMISSING SPECIFIC COUNTS OF THE SUPERSEDING INDICTMENT

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States, by and through its undersigned attorney, hereby files this motion and proposed order dismissing specific counts of the Superseding Indictment against defendant LIZHEN CHEN.

Defendant is charged by the Superseding Indictment in this case with: Count 39 and Count 87, in violation of Title 18, United States Code, Section 1956(h)- conspiracy to launder monetary instruments; Count 49, Count 52, Count 53 and Count 54, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i)- laundering of monetary instruments; Count 59, Count 61, Count 62 and Count 63, in violation of Title 18, United States Code, Section 1957(a) - engaging in

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monetary transactions in property derived from specified unlawful activity; Count 101, in violation of Title 18, United States Code, Section 371 - conspiracy to submit false loan application; and Count 103, in violation of Title 18, United States Code, Section 1014 - false loan application.

In the interest of justice, and as a part of the resolution of co-defendant Mady Chan's case, the government therefore requests that the Court dismiss these specific counts in the Superseding Indictment in this case.

DATED: February 28, 2012

BENJAMIN B. WAGNER
United States Attorney

By: /s/ William S. Wong
WILLIAM WONG
Assistant U.S. Attorney

ORDER

The Government's request to dismiss the specific counts in the Superseding Indictment is APPROVED AND SO ORDERED.

DATE: February 28, 2012

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE