

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

2023 SEP 22 AM 10:00

THE STATE OF OKLAHOMA, )  
Plaintiff, )  
v. )  
ZHIHUI CHEN, )  
DOB: 07/04/1976 )  
SSN: XXX-XX-7035 )  
Defendant. )

Case No. CF-2023-  
BY JSS DEPUTY  
FAM BIRTH

INDICTMENT

**FOR:**

**COUNT 1: MANUFACTURING A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

**COUNT 2: TRAFFICKING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: IN EXCESS OF TWENTY-FIVE POUNDS OF MARIJUANA ~ 63 O.S. § 2-415(C)(1)(a), a FELONY**

**COUNT 3: MANUFACTURING A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

**COUNT 4: TRAFFICKING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: IN EXCESS OF TWENTY-FIVE POUNDS OF MARIJUANA ~ 63 O.S. § 2-415(C)(1)(a), a FELONY**

**COUNT 5: MANUFACTURING A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

**COUNT 6: TRAFFICKING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: IN EXCESS OF TWENTY-FIVE POUNDS OF MARIJUANA ~ 63 O.S. § 2-415(C)(1)(a), a FELONY**

**COUNT 7: PATTERN OF CRIMINAL OFFENSES, ~ 21 O.S. § 425, a FELONY**

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

By the order of the Supreme Court of Oklahoma, the Twentieth Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from June 27, 2023, for eighteen (18) months, or until the designated presiding judge determines the Twentieth Multi-County Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That said Multi-County Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into, and true presentment make, of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath, and in the name and by the authority of the State of Oklahoma, do present and find:

**COUNT 1: MANUFACTURING A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

On or about July 25, 2023, the crime of manufacturing marijuana plants from which a controlled dangerous substance is derived was committed by **ZHIHUI CHEN**, who knowingly aided, promoted, or encouraged others, both known and unknown to the Grand Jury, to manufacture, cultivate, and/or produce a species of plant from which a controlled dangerous substance is derived, to wit: marijuana at Green Panda Cultivation Inc., 146 Sunshine Road, McAlester, Pittsburg County, Oklahoma. Which said marijuana is classified as a controlled dangerous substance in Schedule I of the Controlled Dangerous Substance Act of this State, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ( )

*Angela Fitzgerald*  
FOREMAN  
OKLAHOMA MULTICOUNTY GRAND JURY

COUNTY OF PITTSBURG } SS  
STATE OF OKLAHOMA }  
I, PAM SMITH, Court Clerk in and for Pittsburg County State of Oklahoma do hereby certify that the within and foregoing is a full, true and correct copy of the original *document* as the same appears on file and record in my office in witness whereof, I hereunto set my hand and affix the seal of said court.  
This *22* day of *Sept.*, 20*23*  
By *[Signature]* PAM SMITH, Court Clerk  
Deputy

**COUNT 2: TRAFFICKING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: IN EXCESS OF TWENTY-FIVE (25) POUNDS OF MARIJUANA, 63 O.S. § 2-415, a FELONY**

On or about July 25, 2023, the crime of **TRAFFICKING IN MARIJUANA**, a controlled dangerous substance, was committed by **ZHIHUI CHEN**, who knowingly aided, promoting, or encouraging the possession of in excess of twenty-five (25) pounds of marijuana, at Green Panda Cultivation Inc., 146 Sunshine Road, McAlester, Pittsburg County, Oklahoma, a Schedule I controlled dangerous substance, contrary to the provisions of Section 2-415(C)(1)(a) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL

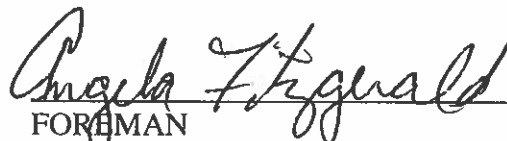
  
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FOREMAN  
OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 3: MANUFACTURING A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

On or about August 16, 2023, the crime of manufacturing marijuana plants from which a controlled dangerous substance is derived was committed by **ZHIHUI CHEN** who knowingly aided, promoted, or encouraged others, both known and unknown to the Grand Jury, to manufacture, cultivate, and/or produce a species of plant from which a controlled dangerous substance is derived, to wit: marijuana at Zhchen Farm LLC, 7960 Elder Court, Calumet, Canadian County, Oklahoma. Which said marijuana is classified as a controlled dangerous substance in Schedule I of the Controlled Dangerous Substance Act of this State, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL

  
\_\_\_\_\_  
FOREMAN  
OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 4: TRAFFICKING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: IN EXCESS OF TWENTY-FIVE (25) POUNDS OF MARIJUANA, 63 O.S. § 2-415, a FELONY**

On or about August 16, 2023, the crime of **TRAFFICKING IN MARIJUANA**, a controlled dangerous substance, was committed by **ZHIHUI CHEN** acting with others, both known and unknown to the Grand Jury, knowingly aiding, promoting, or encouraging the possession of in excess of twenty-five (25) pounds of marijuana, at Zhchen Farm LLC, 7960 Elder Court, Calumet, Canadian County, Oklahoma, a Schedule I controlled dangerous substance, contrary to the provisions of Section 2-415(C)(1)(a) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL

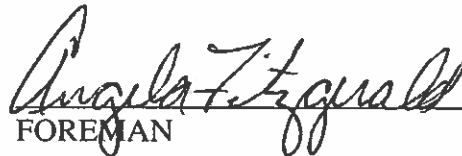
  
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FOREMAN  
OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 5: MANUFACTURING A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA ~ 63 O.S. § 2-401(G), a FELONY**

On or about August 16, 2023, the crime of manufacturing marijuana plants from which a controlled dangerous substance is derived was committed by **ZHIHUI CHEN** who knowingly aided, promoted, or encouraged others, both known and unknown to the Grand Jury, to manufacture, cultivate, and/or produce a species of plant from which a controlled dangerous substance is derived, to wit: marijuana at International Growing Company LLC, 13241 NS 3530, Maud, Seminole County, Oklahoma. Which said marijuana is classified as a controlled dangerous substance in Schedule I of the Controlled Dangerous Substance Act of this State, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL



FOREMAN

OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 6: TRAFFICKING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: IN EXCESS OF TWENTY-FIVE (25) POUNDS OF MARIJUANA, 63 O.S. § 2-415, a FELONY**

On or about August 16, 2023, the crime of **TRAFFICKING IN MARIJUANA**, a controlled dangerous substance, was committed by **ZHIHUI CHEN** acting with others, both known and unknown to the Grand Jury, knowingly aiding, promoting, or encouraging the possession of in excess of twenty-five (25) pounds of marijuana, at International Growing Company LLC, 13241 NS 3530, Maud, Seminole County, Oklahoma, a Schedule I controlled dangerous substance, contrary to the provisions of Section 2-415(C)(1)(a) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ( )

  
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FOREMAN  
OKLAHOMA MULTICOUNTY GRAND JURY

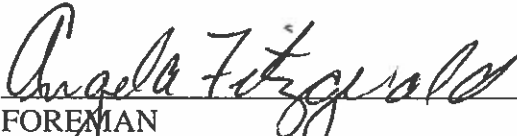


**COUNT 7: PATTERN OF CRIMINAL OFFENSES, 21 O.S. § 425, a FELONY**

On or about or between July 25, 2023, and August 16, 2023, **ZHIHUI CHEN** did commit the crime of **PATTERN OF CRIMINAL OFFENSES**, a Felony, by unlawfully, willfully and feloniously, in two or more counties of the State of Oklahoma, to-wit: Canadian County, Pittsburg County, and Seminole County manufacture and traffic marijuana, a Schedule I controlled and dangerous substance, constituting multiple transactions in the same plan, scheme or pattern contrary to the provisions of Title 21 O.S. §425 and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL

  
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FOREMAN  
OKLAHOMA MULTICOUNTY GRAND JURY

**PENALTIES**

COUNT(S) 1, 3, 5: Manufacturing a Controlled Dangerous Substance (Marijuana) – Imprisonment in the custody of the Department of Corrections for not less than seven (7) years nor more than life and by a fine of not less than Fifty Thousand Dollars (\$50,000.00), which shall be in addition to other punishment provided by law and shall not be imposed in lieu of other punishment. 63 O.S. § 2-401(G)

COUNT(S) 2, 4, 6: Trafficking in Illegal Drugs (Marijuana) - Imprisonment in the custody of the Department of Corrections not to exceed twenty (20) years and a fine of not less than Twenty-five Thousand Dollars (\$25,000.00) and not more than One Hundred Thousand Dollars (\$100,000.00). 63 O.S. § 2-415(D)(1).

COUNT(S) 7: Pattern of Criminal Offenses - Imprisonment for a term not to exceed two (years) in the Department of Corrections, or one (1) year in the County Jail, and/or \$25,000.00 fine. 21 O.S. §425(A).

**WITNESSES (Before the Grand Jury):**

Michael Hanson, Oklahoma Medical Marijuana Authority  
Lindsey Gervacio, Oklahoma Medical Marijuana Authority  
Trisha Taylor, Oklahoma Medical Marijuana Authority