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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREE ELECTRIC APPLIANCES, INC.
OF ZHUHAI,
HONG KONG GREE ELECTRIC
APPLIANCES SALES CO., LTD.,
and
GREE USA, INC.,

Defendants.

CR No. 2:21-cr-00498-MCS

I N F O R M A T I O N

[15 U.S.C. §§ 2068(a)(4), 2070:
Knowing and Willful Failure to
Report Information Regarding
Consumer Product Safety Defects,
Hazards, and Risks; 15 U.S.C.
§ 2070(c)(1), 18 U.S.C.
§ 981(a)(1)(C), 21 U.S.C. § 853,
28 U.S.C. § 2461(c): Criminal
Forfeiture]

The United States Department of Justice's Consumer Protection
Branch and the Acting United States Attorney for the Central District
of California charge:

[15 U.S.C. §§ 2068(a)(4), 2070]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

1. By at least September 2012, in Los Angeles County, within
the Central District of California, and elsewhere, defendants GREE
ELECTRIC APPLIANCES, INC. OF ZHUHAI, HONG KONG GREE ELECTRIC
APPLIANCES SALES CO., LTD., and GREE USA, INC., obtained information

1 which reasonably supported the conclusion that dehumidifiers
2 manufactured, distributed, and sold in interstate commerce by the
3 defendants contained a defect that caused those dehumidifiers to
4 overheat and catch fire, creating a substantial product hazard, and
5 created an unreasonable risk of serious injury and death to United
6 States consumers who operated the dehumidifiers in their homes and
7 businesses.

8 2. Despite knowing that they were required immediately to
9 inform the United States Consumer Product Safety Commission of the
10 defects and risks of those dehumidifiers they manufactured,
11 distributed, and sold in interstate commerce, defendants GREE
12 ELECTRIC APPLIANCES, INC. OF ZHUHAI, HONG KONG GREE ELECTRIC
13 APPLIANCES SALES CO., LTD., and GREE USA, INC., knowingly and
14 willfully failed to inform the United States Consumer Product Safety
15 Commission of those dehumidifiers' defects and risks until in or
16 about June 2013.

17 B. KNOWING AND WILLFUL FAILURE TO REPORT INFORMATION REGARDING
18 CONSUMER PRODUCT SAFETY DEFECTS, HAZARDS, AND RISKS

19 3. From on or about September 19, 2012, through at least on or
20 about June 2013, in Los Angeles County, within the Central District
21 of California, and elsewhere, defendants GREE ELECTRIC APPLIANCES,
22 INC. OF ZHUHAI, HONG KONG GREE ELECTRIC APPLIANCES SALES CO., LTD.,
23 and GREE USA, INC., knowingly and willfully failed to immediately
24 report to the United States Consumer Product Safety Commission upon
25 receiving information that reasonably supported the conclusion that
26 the Chinese dehumidifiers contained a defect that could create a
27 substantial product hazard, and created an unreasonable risk of
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1 serious injury and death, as required by Title 15, United States
2 Code, Section 2064(b) (3) and (4).

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FORFEITURE ALLEGATIONS

[15 U.S.C. § 2070(c)(1); 18 U.S.C. § 981(a)(1)(C); 21 U.S.C. § 853;
28 U.S.C. § 2461(c)]

4. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 15, United States Code, Section 2070(c)(1) and Title 28, United States Code, Section 2461(c) in the event of any defendant's conviction under the sole count of this Information:

5. Defendants shall forfeit the following property to the United States of America:

a. all right, title, and interest in any and all property associated with any violation of the sole count of this Information; and

b. to the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subsection a.

7. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), each defendant shall forfeit substitute property, up to the total value of the property described in the preceding paragraph, if, as a result of

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1 any act or omission of a defendant, the property described in the
2 preceding paragraph, or any portion thereof: (a) cannot be located
3 upon the exercise of due diligence; (b) has been transferred or sold
4 to, or deposited with a third party; (c) has been placed beyond the
5 jurisdiction of the court; (d) has been substantially diminished in
6 value; or (e) has been commingled with other property that cannot be
7 divided without difficulty.

8 TRACY L. WILKISON
Acting United States Attorney

GUSTAV W. EYLER
Director
Consumer Protection Branch

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11 SCOTT M. GARRINGER
12 Assistant United States Attorney
13 Chief, Criminal Division

ALLAN GORDUS
NATALIE N. SANDERS
MARYANN N. MCGUIRE
Trial Attorneys
Consumer Protection Branch
Civil Division
U.S. Department of Justice

14 JOSEPH O. JOHNS
15 DENNIS MITCHELL
Assistant United States Attorneys
Environmental & Community Safety
Crimes Section