

Overview:

The information contained in this document is a collection of "open-source media" material found via Internet search. It is offered for demonstrative purposes only to help shed light on this evolving issue. There has been no independent verification of the information contained in the works cited within this document. The material and information herein can be treated as "unclassified" and "non-law enforcement sensitive".

The overall purpose of this briefing is to provide the reader an overview of information from different resources and data perspectives into the evolution of the People's Republic of China's (PRC) role in domestically produced and trafficked marijuana. (Note: The terms marijuana and cannabis are used repeatedly in the source citations for this document, as such their use and meaning herein are synonymous.)

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 illegal Chinese-labeled pesticide fumigates, 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.

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. [1] Chinese criminal groups run more than 80% of these marijuana farms, which shows a dramatic change in America's drug world. [1]

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



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. [1]

OKLAHOMA'S LICENSED GROW SITES AND DISPENSARIES 2,110 Licensed **Grow Sites** 1.443 Licensed Dispensaries

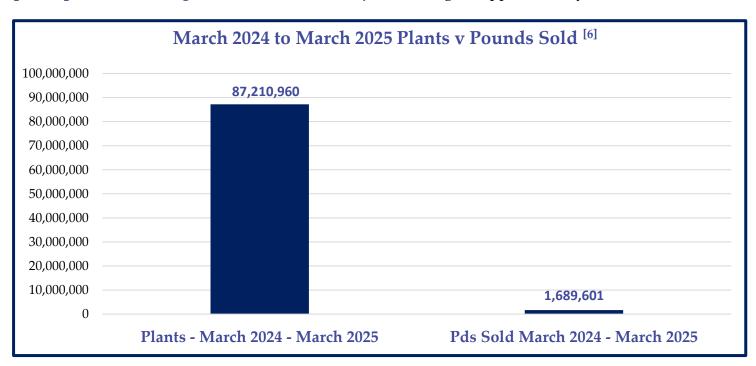
	POPULATION	LICENSED CULTIVATION /	LICENSED
STATE	OF STATE [4]	GROW SITES	DISPENSARIES/RETAILERS
CALIFORNIA	39,538,223	4,614 ^[5]	1,803 [5]
OKLAHOMA	3,959,353	2,110 ^[6]	1,443 [6]

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) [6]



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% 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. [7] 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]



<u>Chinese Marijuana Farms in Maine Under Investigation</u> - 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]



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. [10] 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 a New Mexico-based criminal organization was to target Chinese immigrants who lost work during the COVID-19 pandemic. [11] Their sophisticated recruitment strategy included:

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



<u>Living and Working Conditions</u> - 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 ^[11], 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. ^[12]

Workers often sleep in various makeshift accommodations:

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



Human Rights Violations – 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. [11] Cases have been documented where armed guards with guns and machetes patrol the premises [11], and workers face constant surveillance through cameras and security personnel. [13] The exploitation extends beyond confinement. Workers report receiving no payment for their labor, with some owed up to \$12,000 in promised wages. [11] 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. [10]

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." [12] 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. [12] 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. [12]

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		
TOTALS	23,471	27,756	52,700	78,701	23,649	235.3		

^{*}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).



Illegal Chinese Labeled Pesticide Fumigants Pose Significant Threat to Human Health and the Environment [11]

"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 95th Civil Support Team (95th CST) and determined to contain a mixture of highly toxic pesticides that pose a significant threat to human health and the environment." [14]



"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, and New York." [14]



"Chinese-labeled pesticide fumigants come in a variety of multicolored 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." [14]

"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)." [14]





Hazardous Materials

Waste (makeshift landfills)

Additional Threats and Environmental Impacts from Illegal Cultivation Activities



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

- - 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" [14]

Solid Waste Abandonments and Buried Solid

"Unpermitted and Improper Storage of

➤ Fire Hazards and Dangers of Wildfires: **Destruction of Natural Resources**



Overview of Suspected Burn Pit at Illegal Grow



Trash/Debris and Hazardous Waste/Universal Waste

<u>Law Enforcement Exposure to Active Fumigation</u> – 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. [14]

Reported Symptoms:

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



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.



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. [15]

<u>Chinese Diplomat's Visits Raise Red Flags for Law Enforcement</u> - U.S. officials grew concerned when Consul General Zhu Di visited Oklahoma cultural associations in November 2022 that were under investigation for marijuana trafficking. ^[16] The diplomat met with people who had either pleaded guilty to or faced charges for drug-related crimes. ^[16] "He's meeting with known criminals," said OBN Director Donnie Anderson. ^[16] 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. ^[16]

Utilization of WeChat by Chinese TCO's



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. [17][18]

Evidence shows that WeChat has become a major platform for transnational money laundering, particularly in the illegal drug trades involving fentanyl and marijuana.

[17][19][20][21]

Additionally, WeChat is used to share intelligence information, secure messages between coconspirators, and to transmit orders to the TCO's "workers." [17][22][23]

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. [17][22][23]

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. [17][24] In 2023, "Operation Chem Capture" led to indictments of eight companies and 12 individuals for using WeChat to facilitate illegal fentanyl precursor sales. [17][25] Recently, three members of an international money laundering organization were charged in South Carolina for using WeChat in fentanyl money laundering activities. [17][26] As one DEA agent stated, "It is all happening on WeChat." [17][27]





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 Oklahoma, where illicit cannabis sales generate \$18-44 billion annually, are Chinese-operated. [1]
- ➤ Chinese nationals are trafficked across the Mexican border and forced into debt bondage, working 14-hour shifts in dangerous conditions without pay. [10]
- ➤ Criminal networks use straw owners, shell companies, and cultural associations as fronts while maintaining connections to Chinese government officials. [7]
- ➤ Marijuana profits fund broader criminal enterprises including fentanyl trafficking, with millions being laundered through Chinese money networks. [1]
- ➤ 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. [17][19][20][21]
- ➤ The rapid expansion since 2020 demonstrates remarkable adaptability, with operations shifting between states as enforcement pressures change. [1]
- ➤ The use of banded Chinese labeled pesticide fumigants pose a potential danger to law enforcement personnel

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.



References:

- 1 Rotella, S. and Berg, K., ProPublica, and Yalch, G. and Adcock, C., The Frontier, March 14, 2024, Gangsters, Money and Murder: How Chinese Organized Crime is Dominating America's Illegal Marijuana Market, https://www.propublica.org/article/chinese-organized-crime-us-marijuana-market
- 2 Robinson, S. (January 24, 2024), Maine Wire, Triad Weed: How Chinese Marijuana Grows Took Over Rural Maine, https://www.themainewire.com/2023/11/triad-weed-illegal-chinese-marijuana-grows-are-all-over-maine/
- 3 United State's Attorney's Office, District of Massachusetts, Press Release (July 8, 2025), Seven Chinese Nationals Charged for Alleged Roles in Multi-Million-Dollar Money Laundering, Alien Smuggling and Drug Trafficking Enterprise, https://www.justice.gov/usao-ma/pr/seven-chinese-nationals-charged-alleged-roles-multi-million-dollar-money-laundering
- 4 United States Census Bureau, 2020 Decennial Census, Accessed on July 24, 2025; https://data.census.gov/
- 5 California Department of Cannabis Control, Cannabis License Summary Report, Accessed on July 24, 2025; https://cannabis.ca.gov/resources/data-dashboard/license-report/
- 6 Oklahoma Bureau of Narcotics, Marijuana Enforcement Team, Unpublished Raw Data, Accessed on July 22, 2025.
- 7 Fertig, N. (March 21, 2023), Politico, The Growing Chinese Investment in Illegal American Weed, https://www.politico.com/news/2023/03/21/illicit-cannabis-china-00086125
- 8 Mudd, L. MPH, Sofis, M. PHD, Slade, M. MPH, (June 2023), Cannabis Public Policy Consulting, *An Empirical Assessment of Oklahoma's Medical Marijuana Market*, Prepared for Oklahoma Medical Marijuana Authority, https://oklahoma.gov/content/dam/ok/en/omma/content/publications/supply-and-demand-study/EmpiricalAssessmentofOklahomasMedicalMarijuanaMarket.pdf
- 9 United States Attorney's Office, District of Massachusetts, Press Release (July 8, 2025), Seven Chinese Nationals Charged for Alleged Roles in Multi-Million-Dollar Money Laundering, Alien Smuggling and Drug Trafficking Enterprise, https://www.justice.gov/usao-ma/pr/seven-chinese-nationals-charged-alleged-roles-multi-million-dollar-money-laundering
- 10 Feng, E. (June 24, 2024), NPR, Inside the Chinese-funded and staffed marijuana farms springing up across the U.S., https://www.npr.org/2024/06/24/1238497863/chinese-marijuana-farms-new-mexico
- 11 Business & Human Rights Resource Centre (February 4, 2025), USA: Federal investigation uncovers illegal marijuana operation on Navajo land with allegations of worker exploitation and environmental violations, https://www.business-humanrights.org/en/latest-news/usa-lawsuit-alleges-trafficking-and-exploitation-of-chinese-immigrant-workers-at-illicit-marijuana-farm-on-navajo-land/
- 12 -Rotella, S., ProPublica, Yalch, G. and Adcock, C. The Frontier, (August 16, 2024), ProPublica, Escaping Oklahoma: A Worker's Story From Inside an Illegal Marijuana Operation, https://www.propublica.org/article/oklahoma-illegal-marijuana-farm-workers-inside-story-china-immigrants
- 13 -Montoya Bryan, S., and Yamat R., (September 27, 2023), Associated Press U.S. News, Chinese Immigrant Workers Sue Over Forced Labor at Illegal Marijuana Operation on Navajo Land, https://apnews.com/article/navajo-marijuana-farms-chinese-workers-trafficking-lawsuit-4b2387e2bb6d9645bf2f2e8c81482281
- 14 Javid, H. REHS/HMS (July 19, 2025), California Environmental Protection Agency, Office of the Secretary Enforcement, CalEPA Enforcement Coordinator; Unpublished Data
- 15 Tomic, E. (February 7, 2024), Maine Wire, 50 Members of Congress Sign Onto Letter Demanding Answers from DOJ on Illegal Chinese Marijuana Grows, https://www.themainewire.com/2024/02/50-members-of-congress-sign-onto-letter-demanding-answers-from-doj-on-illegal-chinese-marijuana-grows/
- 16 Rotella, S. and Berg, K., ProPublica, and Yalch, G. and Adcock, C., The Frontier, March 22, 2024, A Diplomat's Visits to Oklahoma Highlight Contacts Between Chinese Officials and Community Leaders Accused of Crimes, https://www.propublica.org/article/oklahoma-marijuana-china-diplomat-visits
- 17 Jackson, J., North Carolina Attorney General, Wilson, A., South Carolina Attorney General, Weiser, P., Colorado Attorney General, Fitch, L., Mississippi Attorney General, Formella, J., New Hampshire Attorney General, and Platkin, M., New Jersey Attorney General, (May 12, 2025), WeChat Demand Letter; https://www.scag.gov/media/fyvbafce/2025-5-07-wechat-demand-letter.pdf
- 18 Krystal Hu, WeChat U.S. ban cuts off users link to families in China, REUTERS (Aug. 7, 2020, 6:36 PM), https://www.reuters.com/article/technology/wechat-us-ban-cuts-off-users-link-to-families-in-china-idUSKCN253339/
- 19 Pub. Prosecutor v. Lim Wei Fong, No. 16-2023 (High Ct. of the Republic of Sing. Jan. 10, 2024), https://www.elitigation.sg/gd/s/2024 SGHC 3
- 20- Ben Tan, Johor Cops Bust Drug Ring Using WeChat to Cut Deals, Seize RM2.95m in Narcotics, MALAYMAIL (July 2, 202, 4:10 PM), https://www.malaymail.com/news/malaysia/2025/07/02/johor-cops-bust-drug-ring-using-wechat-to-cut-deals-seize-rm295m-in-narcotics/182573
- 21 WeChat Drug Dealer Jailed, GLOBAL TIMES (June 16, 2015, 7:13 PM), https://www.globaltimes.cn/content/927377.shtml
- 22 Lauren Greenwood & Kevin Fashola, Illicit Fentanyl from China: An Evolving Global Operation, U.S. China Econ. and Sec. Rev. Comm'n, Aug. 24, 2021, https://www.uscc.gov/sites/default/files/2021-08/Illicit Fentanyl from China-An Evolving Global Operation.pdf;
- 23 National Money Laundering Risk Assessment, U.S. Treasury Dep't 24 (2022), https://home.treasury.gov/system/files/136/2022-National-Money-Laundering-Risk-Assessment.pdf.
- 24 Indictment at ¶19, United States v. Xizhi-Li, et al., No. 1:19-cr-00334-LMB (E.D. Va. 2019) (ECF No. 1), https://insightcrime.org/wp-content/uploads/2021/08/Xizhi-Li-Indictment.pdf.
- 25 Fiscal 2025 Request for the Drug Enforcement Administration, House Committee on Appropriations Before the Subcommittee on Commerce, Justice, and Science United States House of Representatives, 118th Cong. 8 (2024) (statement of Anne Milgram, Administrator, Drug Enforcement Administration), https://www.justice.gov/ola/media/1379226/dl?inline.
- 26 Indictment at ¶22, United States v. Ullah, et al., 3:25-cr-00606-CRI (D.S.C. 2025) (ECF No. 3).
- 27 Kristen Berg & Sebastian Rotella, The Gangster Who Changed Money Laundering, PROPUBLICA (Oct. 11, 2022, 5:00 AM), https://www.propublica.org/article/china-cartels-xizhi-li-money-laundering.