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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. JIA BEI ZHU, AKA JESSE ZHU, QIANG HE, AND DAVID HE, Defendants.	CASE NO. 1:23-CR-00219-DAD-EPG GOVERNMENT'S EXHIBIT LIST DATE: April 21, 2026 TIME: 8:30 a.m. COURT: Hon. Dale A. Drozd

The government submits the following list of exhibits that it intends to introduce in its case-in-chief. The government attempted to meet and confer with the defense but was unsuccessful. The government requests permission to supplement this list as needed during trial.

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
1	**UMI Bank of America Account Ending 9664 August 2020 Statement**	ZHU_00049569-ZHU_00049572		
2	**UMI Bank of America Account Ending 9664 December 2020 Statement**	ZHU_00049593-ZHU_00049598		
3	**UMI Bank of America Account Ending 9345 January 2022 Statement**	ZHU_00051475-ZHU_00051486		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
4	**Bank of America wire withdraw dated January 26, 2022**	ZHU_00010200		
5	**Bank of America wire withdraw dated January 26, 2022**	ZHU_00010201		
6	**UMI Bank of America Account Ending 9664 May 2020 Statement**	ZHU_00049551-ZHU_00049558		
7	**Bank of America Signature Card Account Ending 9345**	ZHU_00086302-ZHU_00086315		
8	**Bank of America Signature Card Account Ending 9664**	ZHU_00086320-ZHU_00086327		
9	**Bank of America 902(11)**	ZHU_00000854-ZHU_00000856		
10	**Invoice between Berryku and Vapetro Technology LLC dated Janaury 6, 2022 to January 23, 2022**	ZHU_00084917-ZHU_00084919 and ZHU_00084926-ZHU_00084927		
11	**Invoice between Berryku and Vapetro Technology LLC dated Janaury 12, 2022 to January 19, 2022**	ZHU_00084920-ZHU_00084922 and ZHU_00084924		
12	**FedEx receipt and shipping labels for UMI with Vapetro Technology LLC**	ZHU_00122369, ZHU_00122358-ZHU_00122367		
13	**FedEx Shipping labels for UMI with Vapetro Technology LLC**	ZHU_00122322-ZHU_00122331		
14	**Jim Wu text message with Vapetro Technology LLC dated January 26, 2022**	ZHU_00122377		
15	**Translation to Jim Wu text message with Vapetro Technology LLC dated January 26, 2022_Redacted**	ZHU_00138834		
16	**Vapetro Technology LLC text message with Berryku dated January 15, 2022**	ZHU_00122404		
17	**Invoice between Vapetro Technology LLC and Sunshine Easy dated January 26, 2022**	ZHU_00010199		
18	**Development Supplemental Agreement between Cormeum Lab Services LLC and UMI_Redacted**	ZHU_00006058-ZHU_00006060		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
19	**Cormeum Lab Services LLC and UMI Invoice dated December 24, 2020_Redacted**	ZHU_00006440		
20	**Cormeum Lab Services LLC and UMI Invoice dated December 24, 2020**	ZHU_00015894		
21	**Cormeum Lab Services LLC and UMI Purchase Order dated January 8, 2021**	ZHU_00028233		
22	**Cormeum Lab Services LLC and UMI Purchase Order dated January 28, 2021_Redacted**	ZHU_00006055		
23	**Cormeum Lab Services LLC and UMI Letter Agreement Amending Purchase Order dated March 4, 2021_Redacted**	ZHU_00006056-ZHU_00006057		
24	**UMI and Cormeum Lab Services LLC Quantity Shipping Schedule**	ZHU_00129297		
25	**UMI Invoice to COVID Scan LLC dated August 10, 2020**	ZHU_00086483		
26	**Intentionally left blank**			
27	**Email between Karekin Khatchadoorian and Christopher Nagle dated January 18, 2022**	ZHU_00135345-ZHU_00135346 ZHU_00135344		
28	**Intentionally left blank**			
29	**Intentionally left blank**			
30	**Photograph of Skippack Box Design Approved by Christopher Nagle**	ZHU_00135329		
31	**Exclusive Manufacturing Supply Agreement between Skippack and UMI**	ZHU_00085249-ZHU_00085276		
32	**UMI Invoice to Skippack dated January 25, 2022**	ZHU_00135406		
33	**GOMD Packing List dated May 22, 2020**	ZHU_00138259		
34	**T-1 Liberty Inc. Office Invoices**	ZHU_00027519-ZHU_00027527		
35	**Vapetro Technology LLC Invoice to T-1 Financial Inc dated January 12, 2022**	ZHU_00027680		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
36	**Donovan Blackney Photograph during Initial Site Visit Buffer in Water Bottle**	ZHU_00132914		
37	**Cormeum-Sensiva Inspection Photos**	ZHU_00126543		
38	**Cormeum-Sensiva Inspection Photos**	ZHU_00126546		
39	**Cormeum-Sensiva Inspection Photos**	ZHU_00126549		
40	**Cormeum-Sensiva Inspection Photos**	ZHU_00126552		
41	**Cormeum-Sensiva Inspection Photos**	ZHU_00126584		
42	**Cormeum-Sensiva Inspection Photos**	ZHU_00126665		
43	**Cormeum-Sensiva Inspection Photos**	ZHU_00126666		
44	**Cormeum-Sensiva Inspection Photos**	ZHU_00126669		
45	**Cormeum-Sensiva Inspection Photos**	ZHU_00126670		
46	**Cormeum-Sensiva Inspection Photos**	ZHU_00126684		
47	**Cormeum-Sensiva Inspection Photos**	ZHU_00126685		
48	**Cormeum-Sensiva Inspection Photos**	ZHU_00126688		
49	**Cormeum-Sensiva Inspection Photos**	ZHU_00126720		
50	**Cormeum-Sensiva Inspection Photos**	ZHU_00126721		
51	**Cormeum-Sensiva Inspection Photos**	ZHU_00126723		
52	**Cormeum-Sensiva Inspection Photos**	ZHU_00126759		
53	**Cormeum-Sensiva Inspection Photos**	ZHU_00126760		
54	**Cormeum-Sensiva Inspection Photos**	ZHU_00126770		
55	**Cormeum-Sensiva Inspection Photos**	ZHU_00126794		
56	**Cormeum-Sensiva Inspection Photos**	ZHU_00126813		
57	**Cormeum-Sensiva Inspection Photos**	ZHU_00126814		
58	**Cormeum-Sensiva Inspection Photos**	ZHU_00126815		
59	**Cormeum-Sensiva Inspection Photos**	ZHU_00126816		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
60	**Cormeum-Sensiva Inspection Photos**	ZHU_00126818		
61	**Cormeum-Sensiva Inspection Photos**	ZHU_00126825		
62	**Cormeum-Sensiva Inspection Photos**	ZHU_00126831		
63	**Cormeum-Sensiva Inspection Photos**	ZHU_00126832		
64	**Cormeum-Sensiva Inspection Photos**	ZHU_00126833		
65	**Cormeum-Sensiva Inspection Photos**	ZHU_00126836		
66	**Cormeum-Sensiva Inspection Photos**	ZHU_00126837		
67	**Cormeum-Sensiva Inspection Photos**	ZHU_00126838		
68	**Cormeum-Sensiva Inspection Photos**	ZHU_00126839		
69	**Cormeum-Sensiva Inspection Photos**	ZHU_00126843		
70	**Cormeum-Sensiva Inspection Photos**	ZHU_00126844		
71	**Cormeum-Sensiva Inspection Photos**	ZHU_00126856		
72	**Cormeum-Sensiva Inspection Photos**	ZHU_00126868		
73	**Cormeum-Sensiva Inspection Photos**	ZHU_00126870		
74	**Cormeum-Sensiva Inspection Photos**	ZHU_00126872		
75	**Cormeum-Sensiva Inspection Photos**	ZHU_00126880		
76	**Cormeum-Sensiva Inspection Photos**	ZHU_00126881		
77	**Cormeum-Sensiva Inspection Photos**	ZHU_00126882		
78	**Cormeum-Sensiva Inspection Photos**	ZHU_00126885		
79	**Cormeum-Sensiva Inspection Photos**	ZHU_00126889		
80	**Cormeum-Sensiva Inspection Photos**	ZHU_00126890		
81	**Cormeum-Sensiva Inspection Photos**	ZHU_00126906		
82	**Cormeum-Sensiva Inspection Photos**	ZHU_00126973		
83	**Cormeum-Sensiva Inspection Photos**	ZHU_00126987		
84	**Cormeum-Sensiva Inspection Photos**	ZHU_00126990		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
85	**Cormeum-Sensiva Inspection Photos**	ZHU_00127044		
86	**Cormeum-Sensiva Inspection Photos**	ZHU_00127048		
87	**Cormeum-Sensiva Inspection Photos**	ZHU_00127049		
88	**Cormeum-Sensiva Inspection Photos**	ZHU_00127080		
89	**Cormeum-Sensiva Inspection Photos**	ZHU_00127083		
90	**Cormeum-Sensiva Inspection Photos**	ZHU_00127084		
91	**Cormeum-Sensiva Inspection Photos**	ZHU_00127092		
92	**Cormeum-Sensiva Inspection Photos**	ZHU_00127093		
93	**Cormeum-Sensiva Inspection Photos**	ZHU_00127096		
94	**Cormeum-Sensiva Inspection Photos**	ZHU_00127105		
95	**Cormeum-Sensiva Inspection Photos**	ZHU_00127123		
96	**Cormeum-Sensiva Inspection Photos**	ZHU_00127126		
97	**Cormeum-Sensiva Inspection Photos**	ZHU_00127178		
98	**Cormeum-Sensiva Inspection Photos**	ZHU_00127179		
99	**Cormeum-Sensiva Inspection Video- :21 seconds**	ZHU_00127205		
100	**Cormeum-Sensiva Inspection Video- :28 seconds**	ZHU_00127209		
101	**Cormeum-Sensiva Inspection Video- 1:49**	ZHU_00127315		
102	**Cormeum-Sensiva Inspection Video- 1:07**	ZHU_00127317		
103	**Cormeum-Sensiva Inspection Video- 4:03**	ZHU_00127319		
104	**Cormeum-Sensiva Inspection Video- 9:05**	ZHU_00127347		
105	**Cormeum-Sensiva Inspection Video- 2:50**	ZHU_00127389		
106	**Cormeum-Sensiva Inspection Video- 2:00 Clip 1**	ZHU_00127391		
107	**Cormeum-Sensiva Inspection Video- :20 seconds Clip 2**	ZHU_00127391		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
108	**Cormeum-Sensiva Inspection Video- 4:07**	ZHU_00127403		
109	**Cormeum-Sensiva Inspection Video- 5:45**	ZHU_00127545		
110	**Emergency Authorization Use Application dated May 15, 2020**	ZHU_00000426		
111	**Emergency Authorization Use Application dated May 27, 2020**	ZHU_00000001-ZHU_00000002		
112	**Emergency Authorization Use Acknowledgement Letter dated May 28, 2020**	ZHU_00000034-ZHU_00000035		
113	**Box Design submitted on May 27, 2020 with Emergency Authorization Use Application**	ZHU_00000656 and ZHU_00000659		
114	**Fact Sheet submitted on May 27, 2020 with Emergency Authorization Use Application**	ZHU_00000463-ZHU_00000466		
115	**FDA Denial Memo dated October 28, 2020**	ZHU_00085447-ZHU_00085448-		
116	**FDA Emergency Use Authorization Denial Letter dated October 28, 2020**	ZHU_00085451-ZHU_00085452		
117	**Data concerns re Emergency Use Authorization Application**	ZHU_00085444-ZHU_00085446		
118	**Email between Karekin Khatchadoorian and Adam Ruben dated March 31, 2022**	ZHU_00136626-ZHU_00136627		
119	**Email between Karekin Khatchadoorian and Adam Ruben dated March 11, 2022**	ZHU_00010181-ZHU_00010185		
120	**COVID Test Kit LABEL FROM City of Reedley Inspection on April 21, 2023**	ZHU_00013521		
121	**Prestige Biotech Inc. Letter dated May 12, 2023**	ZHU_00009540		
122	**Photo of COVID-19 Test Kit Brochure found May 2023**	ZHU_00009569		
123	**Photos of COVID Test Kits Cassettes found May 2023**	ZHU_00009793-ZHU_00009795		
124	**Photos of disorganization found May 2023**	ZHU_00009642-ZHU_00009659		
125	**Photos of Skippack Tests found May 2023**	ZHU_00009786-ZHU_00009787		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
126	**UMI Product Sales Records Provided to FDA on May 16, 2023**	ZHU_00009338-ZHU_00009339		
127	**Intentionally left blank**			
128	**Defendant California Driver License**	ZHU_00008993		
129	**Video of walk-through of Reedley Lab on**	ZHU_00016631		
130	**FDA COVID Test Policy Found during Federal Search Warrant**	ZHU_00016689		
131	**FDA Q&A re Sell COVID Test to Clinical Labs while Emergency Use Authorization Application while Pending**	ZHU_00016672		
132	**Photograph of International Newtech Development Inc. Bank Statement from Bank of Montreal dated October 30, 2015**	ZHU_00016634		
133	**Photograph of IND Diagnostic Inc. check dated October 08, 2014**	ZHU_00016632		
134	**Defendant Canadian Driver License**	ZHU_00016668		
135	**Skippack Purple Box**	ZHU_00136333		
136	**Skippack Purple Box Inside**	ZHU_00136334		
137	**DiagnosUS White with Yellow Box**	ZHU_00136335		
138	**DiagnosUS White with Yellow Box Inside**	ZHU_00136336		
139	**Skippack all White Box Top**	ZHU_00136342		
140	**Skippack all White Box Side**	ZHU_00136344		
141	**Skippack all White Box Inside**	ZHU_00136345		
142	**IND Pharmaceuticals Inc. 2014 Consent to Act as Director and Officer**	ZHU_00136459		
143	**IND Pharmaceuticals Inc. 2014 Consent Resolutions of All Directors**	ZHU_00136461		
144	**IND Pharmaceuticals Inc. 2014 Registrar of Directors**	ZHU_00136465		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
145	**Skippack Box**	ZHU_00138447		
146	**2003 CBP Prints Clean Version**	ZHU_00138448		
147	**USMS 2023 Prints Clean Version**	ZHU_00027236		
148	**Berryku-Vapetro text**	ZHU_00122384		
149	**Berryku-Vapetro text**	ZHU_00122397		
150	**Translation for Berryku - Vapetro text_Redacted**	ZHU_00138832		
151	**Translation for Berryku-Vapetro text_Redacted**	ZHU_00138833		
152	**Intentionally left blank**			
153	**Vapetro Text with Berryku Box Photo saying Made in USA**	ZHU_00122403		
154	**Intentionally left blank**			
155	**Intentionally left blank**			
156	**Emergency Use Authorization Acknowledgment Letter dated May 18, 2020**	ZHU_00138144		
157	**Intentionally left blank**			
158	**Cover email attached Emergency Use Authorization Acknowledgment Letter**	ZHU_00138185		
159	**Email between Karekin Khatchadoorian and Cormeum dated January 3, 2021_Redacted**	ZHU_00026576-ZHU_00026579		
160	**Email between Karekin Khatchadoorian and Cormeum re 100k test made at UMI dated December 9, 2020_Redacted**	ZHU_00006071-ZHU_00006076		
161	**Text between Karekin Khatchadoorian and TJ on December 4-5, 2020_Redacted**	ZHU_00006096-ZHU_00006097		
162	**Text between Karekin Khatchadoorian and TJ on December 5, 2020_Redacted**	ZHU_00006101		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
163	**Jim Wu Dated January 25, 2021**	ZHU_00087170		
164	**Email from Kymlee Guan re Made in USA dated August 17, 2021 Redacted**	ZHU_00122274		
165	**Kymlee Guan January 26, 2022**	ZHU_00087190		
166	**Intentionally left blank**			
167	**Kymlee Guan January 12, 2022**	ZHU_00087183		
168	**Kymlee Guan January 16, 2022**	ZHU_00087185		
169	**Kymlee Guan January 16-24, 2022**	ZHU_00087188		
170	**Kymlee Guan January 26, 2022**	ZHU_00087197		
171	**Kymlee Guan January 12-16, 2022**	ZHU_00087184		
172	**Kymlee Guan January 16, 2022**	ZHU_00087186		
173	**Kymlee Guan January 26, 2022**	ZHU_00087193		
174	**Translation for Sunshine Easy texts with Kymlee Guan_Redacted**	ZHU_00138822 ZHU_00138824- ZHU_00138830		
175	**Intentionally left blank**			
176	**Skippack CLIA Certified Screenshot sent to Berryku**	ZHU_00084901		
177	**Skippack CLIA Certified Screenshot sent to Berryku**	ZHU_00084900		
178	**Skippack CLIA Certified Screenshot sent to Joanna Cosmetics**	ZHU_00084936- ZHU_00084937		
179	**Skippack Made in USA sent to Berryku**	ZHU_00084899		
180	**Three boxes received by Adam Ruben**	ZHU_00010262		
181	**UMI handout saying Made in USA given to Joanna Cosmetics and Berryku**	ZHU_00084910- ZHU_00084915		
182	**Text message between Karekin Khatchadoorian and Covid Scan LLC with June 3, 2020 Invoice_Redacted**	ZHU_00087774- ZHU_00087776		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
183	**FedEx Shipping Records showing China Supply 2020**	ZHU_00134858-ZHU_00134859, ZHU_00134871, ZHU_00134873, ZHU_00134881-ZHU_00134882, ZHU_00134901-ZHU_00134902, ZHU_00134911-ZHU_00134915, ZHU_00134892-ZHU_00134893		
184	**FedEx 902 (11) Certification**	ZHU_00126133		
185	**Intentionally left blank**			
186	**Bill of Landing with sample Dolphin Logistics Invoice**	ZHU_00129297		
187	**COVID test labels saying made by AIDE in China**	ZHU_00129297		
188	**Dolphin Logistics Sample Invoice**	ZHU_00129297		
189	**Email of Karekin Khatchadoorian re photo of USA test kits to UMI dated April 30, 2021**	ZHU_00129297		
190	**Kym Lee email re 700,000 test kits production order from China**	ZHU_00129297		
191	**Kym Lee production order 700,000 test kits from China**	ZHU_00129297		
192	**Translation for Kym Lee email re 700,000 test kits production order from China and Kym Lee production order 700,000 test kits from China_Redacted**	ZHU_00138835-ZHU_00138837		
193	**Kym Lee email from AIDE with photo of USA test kits**	ZHU_00129297		
194	**Translation for Kym Lee email from AIDE with photo of USA test kits_Redacted**	ZHU_00138838-ZHU_00138840		
195	**Nippon Express Sample Invoice**	ZHU_00129297		
196	**Brochure given to Joanna and Berryku**	ZHU_00122446-ZHU_00122451		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
197	**Draft Ad sent to Karekin Khatchadoorian for approval on April 2, 2021 re "Sales pitch"**	ZHU_00129297		
198	**UMI Jogchat Ad on July 15, 2023**	ZHU_00136314		
199	**Intentionally left blank**			
200	**DiagnosUS website**	ZHU_00136620		
201	**Documents for translation from 2024 FDA AIDE inspection in China**	ZHU_00127594-ZHU_00127597		
202	**Translation for 2024 FDA AIDE inspection Redacted**	ZHU_00138265 ZHU_00138266		
203	**Email between Zhu and Cormeum re relationship with China companies dated September 11, 2020_Redacted**	ZHU_00006127		
204	**David He Chinese Passport given to Joanna Zhong**	ZHU_00122452		
205	**Zhu Personal Statement Declaration for Asylum Application_Redacted**	ZHU_00139044, ZHU_00138660-ZHU_00138664		
206	**Photograph of He Mailbox Application**	ZHU_00122453		
207	**I-589 Application for Asylum and for Withholding of Removal_Redacted**	ZHU_00139044, ZHU_00138622-ZHU_00138633		
208	**I-765 Application for Employment Authorization**	ZHU_00138634-ZHU_00138640		
209	**I-765 Application for Employment Authorization**	ZHU_00139044, ZHU_00138641-ZHU_00138647		
210	**Photographs of AI DE Diagnostic Co., Ltd in China inspection on May 27, 2024_Redacted**	ZHU_00126502-ZHU_00126503		
211	**Inspection of Reedley Lab on May 02, 2023 Video**	ZHU_00005802		
212	**Inspection of Reedley Lab on May 02, 2023 Video A**	ZHU_00005803		
213	**Inspection of Reedley Lab on May 02, 2023 Video B**	ZHU_00005803		
214	**Inspection of Reedley Lab on May 02, 2023 Video C**	ZHU_00005803		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
215	**Inspection of Reedley Lab on May 02, 2023 Video D**	ZHU_00005803		
216	**Inspection of Reedley Lab on May 02, 2023 Video E**	ZHU_00005803		
217	**Inspection of Reedley Lab on May 02, 2023 Video F**	ZHU_00005803		
218	**Inspection of Reedley Lab on May 03, 2023 Video A**	ZHU_00005806		
219	**Inspection of Reedley Lab on May 03, 2023 Video B**	ZHU_00005806		
220	**Inspection of Reedley Lab on May 03, 2023 Video C**	ZHU_00005806		
221	**Inspection of Reedley Lab on May 03, 2023 Video**	ZHU_00005807		
222	**Inspection of Reedley Lab on May 03, 2023 Video**	ZHU_00005808		
223	**Inspection of Reedley Lab on May 15, 2023 Video**	ZHU_00005809		
224	**Email between Sensiva and Mrs. Zhaoyan Wang re Purchase and Sales of Antigen LFD dated December 30, 2020**	ZHU_00028210		
225	**Email between Karekin Khatchadoorian and Tarun Jolly dated November 10, 2020**	ZHU_00028205		
226	**Pregnancy and Covid kit photograph**	ZHU_00136366		
227	**Pregnancy and Covid kit photograph 2**	ZHU_00136367		
228	**Pregnancy and Covid kit photograph 3**	ZHU_00136368		
229	**Intentionally left blank**			
230	**Bar graph visual of UMI sales vs. COVID test sales (Demonstrative)**	ZHU_00138843		
231	**Customer COVID Test Sales (Demonstrative)**	ZHU_00138844		
232	**Fed Ex China to US (Demonstrative)**	ZHU_00138845		
233	**Test Kit Flow 2 (Demonstrative)**	ZHU_00138847		
234	**Intentionally left blank**			
235	**Intentionally left blank**			
236	**About UMI website screenshot**	ZHU_00132937-ZHU_00132938		

EX. NO.	DESCRIPTION	BATES RANGE	IDENTIFIED	ADMITTED
237	**Federal Reserve Wire Transfers**	ZHU_00121531 and ZHU_00139066-ZHU_00139075		
238	**Axon body camera transcript_Redacted**	ZHU_00138400-ZHU_00138446		

ERIC GRANT
United States Attorney

Dated: April 10, 2026

By: */s/ Joseph Barton*
Joseph Barton
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