UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA v. NANJUN SONG, a/k/a Kunyu SONG, a/k/a Kun Yu SONG, JIRUI LIU, XIANG LI, XUEHAI SUN, FANGZHENG WANG, a/k/a Allen Wang, WING KIT HO, a/k/a Ricky HO, ZHENYANG XIN, a/k/a Mandown, CYNTHIA JIA SUN, Defendants.	Cr. No. 1:25-cr-00047MSM-PAS In violation of: 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Commit Wire Fraud – 18 U.S.C. § 1349)

At all times relevant to this Indictment:

1. NANJUN SONG, a/k/a Kunyu SONG, a/k/a Kun Yu SONG (SONG)

was a resident of New York and a citizen of China.

2. JIRUI LIU was a resident of Canada and a citizen of Canada and China.

3. XIANG LI was a resident of New York and a citizen of China.

4. XUEHAI SUN was a resident of New York and a citizen of China.

5. FANGZHENG WANG, a/k/a Allen WANG was a resident of New York and a citizen of China.

6. WING KIT HO, a/k/a Ricky HO was a resident of Canada and a citizen of China.

7. ZHENYANG XIN, a/k/a Mandown was a resident of Canada and a citizen of China.

8. CYNTHIA JIA SUN was a resident of California.

9. B.D.V. was a resident of Cummings, Georgia.

10. R.C. was a resident of Palm Desert, California.

11. B.B. was a resident of Chestertown, Maryland.

12. G.R. was a resident of Bristol, Rhode Island.

13. E.N. was a resident of Corona, California.

14. E.B. was a resident of Spring Hill, Tennessee.

15. J.F. was a resident of Narragansett, Rhode Island.

16. K.M.D. was resident of Kailua, Hawaii.

The Conspiracy

17. Beginning on a date unknown to the Grand Jury, but not later than on or about April 25, 2024, and continuing through on or about February 27, 2025, in the

Districts of Rhode Island, and in Alaska, Arizona, California, Connecticut, Georgia, Hawaii, Maine, Maryland, Massachusetts, Nebraska, Nevada, New Jersey, New York, North Carolina, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, Vermont, Washington, D.C., Wisconsin and elsewhere, the defendants,

NANJUNG SONG,
a/k/a Kunyu SONG a/k/a Kun Yu SONG,
JIRUI LIU,
XIANG LI,
XUEHAI SUN,
FANGZHENG WANG,
a/k/a Allen Wang,
WING KIT HO,
a/k/a Ricky HO,
ZHENYANG XIN,
a/k/a Mandown**, and**
CYNTHIA JIA SUN,

and other persons, known and unknown to the Grand Jury, did knowingly, willfully, and unlawfully combine, conspire, and agree with to commit wire fraud, in violation of 18 U.S.C. § 1343, that is, to knowingly and with intent to defraud, devise and intend to devise a scheme to defraud and to obtain money from others by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and for the purpose of executing such scheme to defraud and to obtain money, caused the transmission of wire communications in interstate and foreign commerce.

The Object of the Conspiracy

18. The object of the conspiracy was for defendants SONG, LIU, LI, X. SUN, WANG, HO, XIN, and C. SUN, and their co-conspirators to unlawfully enrich

themselves by obtaining cash, cryptocurrency, wire transfers, and gold from victims who were defrauded through misrepresentations, including, but not limited to, statements to victims that their bank accounts and assets had been compromised by fraudulent transactions; that their bank accounts and assets were subject to garnishment by the government because the victims were under investigation for criminal activity; that to protect their assets and to avoid garnishment, the victims needed to withdraw funds from their bank accounts and liquidate their assets and obtain cash, cryptocurrency, and gold; and that if the victims gave the cash, cryptocurrency, and gold to a courier or government representative, the funds from their cash, cryptocurrency, and gold would be held in a secure location, would be protected, and would not be subject to garnishment.

<u>Manner and Means of the Conspiracy</u>

19. It was part of the conspiracy that members of the conspiracy made contact with victims in Rhode Island, Alaska, Arizona, California, Connecticut, Georgia, Hawaii, Maine, Maryland, Massachusetts, Nebraska, Nevada, New Jersey, New York, North Carolina, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, Vermont, Washington, D.C., Wisconsin, the country of Canada, and elsewhere, through computer pop-up messages that directed a victim to contact a telephone number regarding allegations that the victim's computer had been compromised or had identified a compromise involving the victim. After victims called the telephone number shown on a computer pop-up message, members of the conspiracy told the victims that their bank had identified fraudulent transactions in their accounts, that the victims were under

investigation for criminal activity, and/or that their social security numbers, email addresses, cell phone numbers, or other personally identifiable information had been compromised ("the compromise").

20. It was further part of the conspiracy that members of the conspiracy would inform victims that due to the compromise and the alleged criminal activity, the victims' bank accounts and assets were not secure and/or that the government would be garnishing bank accounts and assets of the victims. Members of the conspiracy would further inform victims that a government agency could help the victims protect their bank accounts and assets and/or avoid garnishment. Alternatively, a victim would be advised that he or she should protect their funds by withdrawing funds from their allegedly compromised bank accounts and have their funds be held by a government agency for safekeeping in a secure location, including, but not limited to, the Federal Reserve Bank, the Federal Trade Commission, or Treasury Department, or transferring their funds to a third party via wire transfer or cryptocurrency transactions.

21. It was further part of the conspiracy that during phone calls and text message exchanges with the victims, members of the conspiracy would add other members of the conspiracy who would falsely present themselves as employees and representatives of banking institutions, government agencies, and other companies, including Apple, Inc., Microsoft Corporation, and Paypal.

22. It was further part of the conspiracy that members of the conspiracy would travel to victims' residences and to locations in the victims' towns or cities to retrieve cash and gold from victims, and the victims would, as directed by members of

the conspiracy, deliver the cash and gold to a member of the conspiracy who the victims believed was a government representative or a courier for a government representative.

23. It was further part of the conspiracy that members of the conspiracy would use communication applications to obtain phone numbers that would be used for communicating with victims via phone calls and text messages.

24. It was further part of the conspiracy that members of the conspiracy would communicate with one another using encrypted messaging applications, to discuss victim information, pick up and transport of the fraudulently obtained gold or cash, countersurveillance efforts, and disposition of the fraudulently obtained gold or cash.

<u>Acts in Furtherance of the Conspiracy</u>

In furtherance of the conspiracy, at least one of the following acts, among others, was committed by one or more of the co-conspirators in the Districts of Rhode Island, and in Alaska, Arizona, California, Connecticut, Georgia, Hawaii, Maine, Maryland, Massachusetts, Nebraska, Nevada, New Jersey, New York, North Carolina, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, Vermont, Washington, D.C., Wisconsin, the country of Canada, and elsewhere:

25. On multiple dates beginning on an unknown date, but not later than May 31, 2024 and continuing through September 25, 2024, LI and X. SUN communicated with SONG and LIU via messaging platforms about the coordination of and dispatch of couriers to pick up gold and cash from victims, the transport of the gold and cash to SONG, LIU, and other members of the conspiracy, the amounts owed to conspiracy

members, and the conversion of gold to cash.

26. On multiple dates, beginning on an unknown date, and continuing through September 25, 2024, LIU and XIN communicated via messaging platforms about picking up gold and cash from victims in Canada, and XIN sent LIU pictures and videos after he had picked up gold and cash from victims in Canada. LIU and XIN also talked about plans for XIN to pick up gold and cash from victims in the United States, and XIN seeking a visa for this travel. On or about November 6, 2024, XIN entered the United States from Canada via Dallas, Texas, and on or about November 30, 2024, XIN departed the United States for Canada via Los Angeles, California.

27. On or about August 28, 2024, LIU and XIN communicated about HO traveling to the United States to pick up gold and cash from victims in the United States. On multiple dates, including on or about September 3, 2024, LIU instructed XIN to give HO money, including by making deposits into HO's bank account, for the gold and cash pick ups that HO had made at LIU's direction in the United States.

B.D.V. - Cumming, Georgia

28. On or about April 25, 2024, one or more members of the conspiracy caused a pop-up message to appear on the computer of B.D.V., a resident of Cumming, Georgia. The pop-up message stated that B.D.V.'s computer was compromised and directed him to call a phone number to resolve the issue.

29. On multiple dates on and after April 25, 2025, and continuing through on or about May 22, 2024, members of the conspiracy claiming to be representatives from Microsoft and from Regions Bank, spoke with B.D.V. via phone and advised B.D.V. that

his bank accounts were compromised and that he needed to remove funds from his accounts to protect his assets from further fraudulent transactions. A member of the conspiracy further advised B.D.V. that he should purchase gold and provide it to a courier who would be sent to his residence, and that the courier to take the gold to the Federal Reserve Bank for safekeeping.

30. On May 21, 2024, SONG sent a message via an online communication platform to co-conspirator LIU with the address for B.D.V. and a time. Further, on May 22, 2024, SONG sent LIU a message with B.D.V.'s name and address, and other details, including that LIU's name was to be "Ob" and directed LIU to go to the front door.

31. On or about May 22, 2024, LIU arrived at B.D.V.'s residence, identified himself as "Ob," and picked up a one-kilogram bar and a ten-ounce bar of gold that B.D.V. had purchased for $99,504.61.

R.C. – Palm Desert, California

32. On an unknown date in May 2024, one or more members of the conspiracy caused a pop-up message to appear on the computer of R.C., a resident of Palm Desert, California. The pop-up message stated that R.C.'s computer was compromised and directed her to call a phone number to resolve the issue.

33. On multiple dates in May 2024, a member of the conspiracy claiming to be a representative from Microsoft and other members claiming to be a government representative from the Federal Reserve Bank and the Federal Trade Commission directed R.C. to send wire transfers to bank accounts and to provide cash to couriers so that R.C.'s funds would be protected.

34. On May 31, 2024, SONG sent LIU a message via an online communication platform with the address of R.C., a reference to $30,000, and instructions that LIU's name would be "Jack."

35. On May 31, 2024, a member of the conspiracy directed R.C. to provide $30,000 in cash to a courier who would arrive at her residence.

36. On May 31, 2024, LIU sent SONG a message advising that he had "picked it up" and SONG responded "Leave." Thereafter, SONG sent a message asking LIU "is the number correct," to which LIU responded that he picked up $30,000.

B.B. – Chestertown, MD

37. On an unknown date, but not later than July 26, 2024, a member of the claiming to be from the Federal Trade Commission and her personal bank, advised B.B. of Chestertown, Maryland that her bank accounts had been compromised, and that to secure her assets, B.B. should deposit cash into a Bitcoin ATM and also use her cash to purchase gold. A member of the conspiracy further advised B.B. to provide the gold to a courier who would be sent to her residence.

38. On or about July 26, 2024, SONG messaged LI and others and provided the name and address for B.B. and advised of a gold pickup. SONG also provided a name for the courier to use. Later that day, LI messaged SONG and others that the courier had received the item from B.B., and sent videos in the group message of gold coins in plastic bag.

G.R. – Bristol, Rhode Island

39. On an unknown date, but not later than July 26, 2024, a member of the

conspiracy claiming to be from the Federal Trade Commission and from Bank of America requested and obtained remote access to G.R.'s computer and directed G.R. to provide access to his bank account information to correct an alleged fraudulent purchase.

40. On an unknown date, but not later than July 26, 2024, a member of the conspiracy directed G.R. to provide $19,500 in cash to a security officer who would be sent to his residence.

41. On or about July 26, 2024, SONG, LIU, and WANG messaged each other and discussed the pickup of funds from multiple locations, including from G.R. in Bristol, RI. SONG then directed WANG to retrieve approximately $17,500 from G.R. in Bristol, RI. After picking up the cash in Bristol, RI, WANG sent a photograph of the cash via the group message.

E.N. – Corona, California

42. On an unknown date, but not later than August 1, 2024, a member of the conspiracy contacted E.N. and advised her that that her PayPal account had been compromised. Thereafter, other members of the conspiracy advised E.N. that they were representatives of the Federal Trade Commission and directed her to withdraw cash and to give the cash to couriers, for her funds to be secured by the Federal Trade Commission.

43. On or abut August 5, 2024, LIU messaged C. SUN and provided her with the name and address of E.N. and a false name that C. SUN should use when picking the cash up from E.N. On or about August 5, 2024, C. SUN traveled to E.N.'s residence

and retrieved $25,000 cash from her.

E.B. – Spring Hill, Tennessee

44. On an unknown date, but not later than August 27, 2024, a member of the conspiracy advised E.B. that her bank accounts had been compromised, and advised her that to secure her funds, she should give her money to the U.S. Treasury Department. A member of the conspiracy directed E.B. to send money to a third party via a Bitcoin ATM and to give cash couriers who would be sent to her home.

45. On or about August 27, 2024, LIU messaged X. SUN with the name and address for E.B., and provided an amount of $75,000. In the message, LIU further directed X. SUN to send a courier to pick up money from E.B. in Spring Hill, TN.

J.F. – Narragansett, Rhode Island

46. On or about August 31, 2024, a member of the conspiracy, claiming to be a representative of Apple Care, spoke with J.F. of Narragansett, Rhode Island, via phone, and advised him that he was under investigation for attempting to purchase child pornography and that he would connect him with a representative from his bank's fraud unit.

47. On or about August 31, 2024, a member of the conspiracy, claiming to be a representative of J.F.'s bank, spoke with J.F. via phone, and informed him that his social security number had been compromised and had been connected to money laundering activity. A member of the conspiracy further informed J.F. that to avoid garnishment of his assets, he should withdraw funds from his bank accounts and provide it to government representatives who would keep his funds in a secure location.

48. On or about August 31, 2024, a member of the conspiracy directed J.F., via phone calls and text messages, to use Bitcoin ATMs to deposit cash, and after J.F. was unable to use the Bitcoin ATMs, directed him to withdraw approximately $30,000 cash, and provide the cash to an individual who would arrive at J.F.'s residence.

49. On or about September 4, 2024, a member of the conspiracy directed J.F. via phone calls and text messages to purchase $130,000 in gold bars from a gold broker, and to provide the gold bars to an individual who would arrive at J.F.'s residence.

50. On or about September 24, 2024, a member of the conspiracy directed J.F. via phone calls and text messages to purchase $160,000 in gold bars from a gold broker, and to provide the gold bars to an individual who would arrive at J.F.'s residence on September 25, 2024. Later that day, LIU arrived at J.F.'s residence and left with a box containing what he believed was 2 kilograms of gold bars.

K.M.D. – Kailua, Hawaii

51. On an unknown date, but not later than September 14, 2024, a member of the conspiracy contacted K.M.D. and advised that her PayPal account had been compromised. Thereafter, another member of the conspiracy advised K.M.D. that was he was a representative of her bank and advised her that her account had been used to make unauthorized purchases. Next, K.M.D. spoke with other members of the conspiracy who directed her to purchase gold via wire transfers and to provide the gold to couriers who would be sent to her residence.

52. On or about September 14, 2024, LIU sent HO a message directing him to purchase a flight to Hawaii for a pickup of gold. After HO arrived in Hawaii, LIU

messaged him with instructions to make a pickup from K.M.D, and in the message provided K.M.D.'s name and address, and the false name that HO should use. After picking up the gold, HO messaged LIU and sent him a video of gold bars in a box.

COUNT TWO

(Conspiracy to Commit Money Laundering – 18 U.S.C. § 1956(h))

53. The allegations contained in paragraphs 1 through 52 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

The Conspiracy

54. Beginning on a date unknown to the Grand Jury, but not later than on or about April 25, 2024, and continuing through on or about February 27, 2025, in the Districts of Rhode Island, and in Alaska, Arizona, California, Connecticut, Georgia, Hawaii, Maine, Maryland, Massachusetts, Nebraska, Nevada, New Jersey, New York, North Carolina, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, Vermont, Washington, D.C., Wisconsin, and elsewhere, the defendants,

NANJUNG SONG,
a/k/a Kunyu SONG a/k/a Kun Yu SONG,
JIRUI LIU,
XIANG LI,
ZHENYANG XIN,
a/k/a Mandown,

did knowingly combine, conspire and agree with other persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of 18 U.S.C. § 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Objects of the Conspiracy

55. It was an object of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by obtaining money from individuals who were defrauded through pop-up schemes and other schemes into transferring funds out of and withdrawing funds from their bank accounts; transferring funds to third party bank accounts; transferring funds via cryptocurrency transactions; purchasing gold with withdrawn funds; and providing cash and gold to third parties presenting themselves as couriers of government agencies.

56. It was a further object of the conspiracy for the defendants to conduct financial transactions and cause others to conduct financial transactions to conceal and disguise the nature, location, source, ownership, and control of the fraud proceeds.

Manner and Means of the Conspiracy

57. The manner and means of the conspiracy include the manner and means of the conspiracy to commit wire fraud. Accordingly, paragraphs 19-24 are re-alleged and incorporated by reference as if fully set forth herein. Additional manner and means of the conspiracy include the following:

58. Members of the conspiracy also deposited the fraudulently obtained cash into bank accounts including cryptocurrency accounts, controlled by members of the conspiracy, and thereafter transferred funds from those bank accounts to other accounts.

59. Members of the conspiracy also converted the fraudulently obtained gold into currency and deposited the currency into bank accounts, including cryptocurrency accounts, controlled by members of the conspiracy, and thereafter transferred funds from those bank accounts to other accounts.

Acts in Furtherance of the Conspiracy

60. The acts in furtherance of the conspiracy include the acts in furtherance of the conspiracy to commit wire fraud. Accordingly, paragraphs 25-52 are re-alleged and incorporated by reference as if fully set forth herein. Additional acts in furtherance of the conspiracy include the following:

61. On or about May 31, 2024, LIU converted cash picked up from B.D.V. into gold, and messaged SONG about the financial transaction.

62. On or about August 20, 2024, a member of the conspiracy gave SONG gold bars that had been received from a victim and thereafter, on or about August 21, 2024, SONG converted gold, including gold bars received on August 20, 2024, into currency and directed a gold broker to transfer $98,587.88 into a bank account controlled by him.

FORFEITURE ALLEGATION

Upon conviction of the conspiracy to commit wire fraud and conspiracy to commit money laundering offenses alleged in Counts 1 or 2 of this Indictment, the defendants,

NANJUNG SONG,
a/k/a Kunyu SONG a/k/a Kun Yu SONG and

JIRIU LIU,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 1349, and a sum of money equal to the total amount of proceeds obtained as a result of the offenses, including but not limited to, the following.

From **NANJUNG SONG**, a/k/a Kunyu SONG a/k/a Kun Yu SONG:

- Dark grey colored Apple iPhone in a clear plastic case with a red and yellow ribbon inside;
- Dark grey colored Apple iPhone;
- Dark blue colored Apple iPhone;
- White colored Apple iPhone;
- $40,000 in U.S. currency;

all of which were recovered from NANJUNG SONG and a hotel room used by him in the District of Nevada on February 27, 2025; and all funds contained in the following accounts:

- OKX Cryptocurrency Exchange,

  Account Nos. XXXXXXXXXXXXXX3020 and XXXXXXXXXXXXXX 9684.

  From JIRIU LIU

  - an Apple iPhone with a black colored backing;
  - an Apple iPhone with a blue colored backing in a clear plastic case;
  - an Apple Series 10 Smartwatch;
  - a Subscriber Identity Module (SIM) card bearing the logo "ultra mobile;" and
  - $925 in U.S. currency.

all of which were recovered from JIRUI LIU on September 25, 2024;.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence, has been transferred, sold to, or deposited with a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

Upon conviction of one or more of the offenses of this Indictment, defendants,

NANJUNG SONG,
a/k/a Kunyu SONG a/k/a Kun Yu SONG,
JIRUI LIU,
XIANG LI,
XUEHAI SUN,

FANGZHENG WANG,
a/k/a Allen Wang,
WING KIT HO,
a/k/a Ricky HO,
ZHENYANG XIN,
a/k/a Mandown**, and**
CYNTHIA JIA SUN,

shall forfeit to the United States of America, pursuant to 18 U.S.C. ' 981(a)(1)(C) and 28 U.S.C. § 2461(c), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § § 1343, and a sum of money equal to the total amount of proceeds obtained as a result of the offenses.

All in accordance with 18 U.S.C. § 981(a)(1), as incorporated by 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL:

[redacted]
Grand Jury Foreperson

SARA MIRON BLOOM
Acting United States Attorney

Denise M. Barton

DENISE MARIE BARTON
Assistant U.S. Attorney

Lee Vilker

LEE H. VILKER
Assistant U.S. Attorney
Criminal Division Chief

Date: 4/30/25

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:25-cr-00047MSM-PAS-01

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added

☐ Indictment ☐ Charges/Counts Added

☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

RHODE ISLAND
Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

USA vs.

Defendant: NANJUN SONG a/k/a Kunyu SONG, a/k/a Kun Yu SONG

Address: [redacted]

☐ Interpreter Required Dialect:

Birth Date [redacted]

☑ Male ☐ Female

☐ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Atty ☐ Defense

☑ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

SHOW DOCKET NO. 1:25-cr-00030-MSM

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: RHODE ISLAND County

DEFENDANT

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date ______ or Date Transferred to Federal Custody ______

☑ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
2	18 U.S.C. § 1956(h)	Conspiracy to Commit Money Laundering	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of $500,000 or twice the funds involved;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

Submit Go

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:25-cr-00047MSM-PAS-02

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added

☐ Indictment ☐ Charges/Counts Added

☐ Information

USA vs.

Defendant: JIRUI LIU

Address: [redacted]

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

☐ Interpreter Required Dialect:

Birth Date [redacted]

☑ Male ☐ Female

☑ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Atty ☐ Defense

SHOW DOCKET NO.

☑ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

1:24-cr-00089-MSM

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: RHODE ISLAND County

DEFENDANT

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date ____ or Date Transferred to Federal Custody ____

☑ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
2	18 U.S.C. § 1956(h)	Conspiracy to Commit Money Laundering	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of $500,000 or twice the funds involved;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

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PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added

☐ Indictment ☐ Charges/Counts Added

☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

RHODE ISLAND
Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Atty ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: RHODE ISLAND County

CASE NO. 1:25-cr-00047MSM-PAS-03

USA vs.

Defendant: Xiang Li

Address: [redacted]

☐ Interpreter Required Dialect:

Birth Date [redacted]

☐ Male ☑ Alien
☐ Female (if applicable)

Social Security Number

DEFENDANT

Issue: ☑ Warrant ☐ Summons

Location Status:

Arrest Date ______ or Date Transferred to Federal Custody ______

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
2	18 U.S.C. § 1956(h)	Conspiracy to Commit Money Laundering	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of $500,000 or twice the funds involved;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

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PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:25-cr-00047MSM-PAS-4

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added

☐ Indictment ☐ Charges/Counts Added

☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

RHODE ISLAND
Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

USA vs.

Defendant: XUEHAI SUN

Address: [redacted]

☐ Interpreter Required Dialect:

Birth Date [redacted]

☐ Male ☐ Female

☑ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

SHOW DOCKET NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: RHODE ISLAND County

DEFENDANT

Issue: ☑ Warrant ☐ Summons

Location Status:

Arrest Date ____ or Date Transferred to Federal Custody ____

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

Submit Go

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:25-cr-00047MSM-PAS-5

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND
Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

USA vs.

Defendant: FANGZHENG WANG, a/k/a Allen WANG

Address: [redacted]

☐ Interpreter Required Dialect:

Birth Date [redacted]

☐ Male ☐ Female

☑ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Atty ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

MAG. JUDGE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

Place of offense: RHODE ISLAND County

DEFENDANT

Issue: ☑ Warrant ☐ Summons

Location Status:

Arrest Date ______ or Date Transferred to Federal Custody ______

☐ Currently in Federal Custody
☐ Currently in State Custody
☐ Writ Required
☐ Currently on bond
☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D
☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

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PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:25-cr-00047MSM-PAS-6

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

USA vs.

Defendant: WING KIT HO a/k/a Ricky HO

Address: [redacted]

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

☐ Interpreter Required Dialect:

Birth Date [redacted]

☐ Male ☐ Female

☑ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

SHOW DOCKET NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: RHODE ISLAND County

DEFENDANT

Issue: ☑ Warrant ☐ Summons

Location Status:

Arrest Date ______ or Date Transferred to Federal Custody ______

☐ Currently in Federal Custody
☐ Currently in State Custody
☐ Writ Required
☐ Currently on bond
☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment; fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

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PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:25-cr-00047MSM-PAS-7

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added

☐ Indictment ☐ Charges/Counts Added

☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

USA vs.

Defendant: ZHENYANG XIN, a/k/a "Mandown"

[redacted]

Address:

☐ Interpreter Required Dialect:

Birth Date [redacted]

☐ Male ☐ Female

☑ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Atty ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: RHODE ISLAND County

DEFENDANT

Issue: ☑ Warrant ☐ Summons

Location Status:

Arrest Date ____ or Date Transferred to Federal Custody ____

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☐ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
2	18 U.S.C. § 1956(h)	Conspiracy to Commit Money Laundering	☐ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of $500,000 or twice the funds involved;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

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PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:25-cr-00047MSM-PAS-8

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added

☐ Indictment ☐ Charges/Counts Added

☐ Information

USA vs.

Defendant: CYNTHIA JIA SUN

Address: [redacted]

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: SARA MIRON BLOOM

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned): DENISE M. BARTON

☐ Interpreter Required Dialect:

Birth Date 4/21/1990

☐ Male ☐ Female

☐ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations ("HSI")

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

SHOW DOCKET NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: RHODE ISLAND County

DEFENDANT

Issue: ☑ Warrant ☐ Summons

Location Status:

Arrest Date ____ or Date Transferred to Federal Custody ____

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud	☒ Felony ☐ Misdemeanor
Max	20 years imprisonment, fine of twice the gross gain/loss;	3 years supervised release; $100 special assessment	☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
	Forfeiture Allegation	Estimated Trial Days: 3	☐ Felony ☐ Misdemeanor

Submit Go