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ORDERED UNSEALED on 4/30/2025 s/ scottweede

FILED
Apr 04 2025
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/ A Cortez DEPUTY

~~SEALED~~
s/ scottweede

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
August 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUA WANG,

Defendant.

Case No. '25 CR1097 TWR

I N D I C T M E N T

Title 18, U.S.C., Secs. 1349 and 2326 - Conspiracy to Commit Mail and Wire Fraud; Title 18, U.S.C., Secs. 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) - Conspiracy to Launder Monetary Instruments; Title 18, U.S.C., Secs. 981(a)(1)(C), 982(a)(1), 982(a)(2)(A), 2328(a) and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

At all times relevant to this Indictment:

INTRODUCTION

1. A technical support scam, or tech support scam, was a fraud scheme where criminals claimed to offer technical support service. The criminals contacted victims in a variety of ways, including through electronic instant messages on computers and phones or via fake "help lines" advertised on websites owned by the criminals. The criminals used social engineering and confidence tricks to falsely persuade victims that there were problems on their computer or mobile device and to purchase products or services to fix the fictitious "problems."

1 b. wire fraud, in violation of Title 18, United States Code,
2 Section 1343.

3 MANNER AND MEANS

4 7. The objects of the conspiracy were carried out, and were to
5 be carried out, in substance in the following manner:

6 8. Members of the conspiracy operated tech support, bank
7 impersonation, government impersonation, and refund scams targeting
8 elderly victims throughout the United States, including in the Southern
9 District of California.

10 9. Members of the conspiracy contacted potential victims through
11 unsolicited interstate and foreign wire communications, including pop-
12 up ads, emails and phone calls. These unsolicited communications caused
13 victims to call the co-conspirators at a call center operating tech
14 support, government impersonation, bank impersonation, and refund scams.

15 10. Members of the conspiracy used social engineering techniques
16 to build trust with victims. In many instances, conspirators had victims
17 download commercially available remote desktop software, which
18 conspirators used to access victims' computers.

19 11. Using one or more of the scams above, members of the conspiracy
20 induced victims to send monies to other members of the conspiracy
21 throughout the United States and the Southern District of California,
22 including defendant HUA WANG.

23 12. Members of the conspiracy targeted potential victims over the
24 age of 55 with a campaign that included electronic messages, telephone
25 calls, and text messages to induce the purchase of goods and services
26 and victimized more than 10 persons over the age of 55.

27 13. Through their fraudulent representations, members of the
28 conspiracy caused the withdrawal of funds on deposit from financial

1 institutions, which resulted in financial institutions not having
2 additional funds on deposit for business and income purposes. These
3 affected financial institutions included federally insured banks in the
4 Southern District of California.

5 All in violation of Title 18, United States Code, Sections 1349 and 2326.

6 Count 2

7 (Conspiracy to Launder Monetary Instruments)

8 [18 U.S.C. § 1956(h)]

9 14. Beginning on a date unknown to the grand jury, but at least
10 since 2019, and continuing up to and including 2023, within the Southern
11 District of California, and elsewhere, defendant HUA WANG and others
12 known and unknown to the grand jury, knowingly and intentionally
13 conspired:

14 a. to conduct a financial transaction affecting interstate
15 and foreign commerce, which involved the proceeds of a specified unlawful
16 activity, that is conspiracy to commit wire and mail fraud, with the
17 intent to promote the carrying on of the specified unlawful activity,
18 knowing that the property involved in the financial transactions
19 represented the proceeds of some form of unlawful activity, in violation
20 of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

21 b. to conduct a financial transaction affecting interstate
22 commerce and foreign commerce, which involved the proceeds of specified
23 unlawful activity, that is, conspiracy to commit wire and mail fraud,
24 knowing that the transaction was designed in whole and in part to conceal
25 and disguise the nature, location, source, ownership, and control of the
26 proceeds of specified unlawful activity, knowing that the property
27 involved in the financial transaction represented the proceeds of some

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1 form of unlawful activity, in violation of Title 18, United States Code,
2 Section 1956(a)(1)(B)(i).

3 All in violation of Title 18, United States Code, Section 1956(h).

4 **FORFEITURE ALLEGATIONS**

5 15. The allegations contained in Counts 1 and 2 are realleged
6 herein and incorporated for purposes of seeking forfeiture to the United
7 States pursuant to Title 18, United States Code, Sections 981(a)(1)(C),
8 982(a)(1), 982(a)(2)(A), and 2328(a), and Title 28, United States Code,
9 Section 2461(c).

10 16. Upon conviction of the offense set forth in Count 1 of this
11 Indictment, and pursuant to Title 18, United States Code,
12 Sections 981(a)(1)(C) and 2328(a)(1), and Title 28, United States Code,
13 Section 2461(c), defendant HUA WANG shall forfeit to the United States
14 of America all property, real and personal, which constitutes and is
15 derived from proceeds traceable to the violation.

16 17. Upon conviction of the offense set forth in Count 1 of this
17 Indictment, and pursuant to Title 18, United States Code,
18 Section 2328(a)(2), defendant HUA WANG shall forfeit to the United
19 States of America all equipment, software, and other technology used and
20 intended to be used to commit and to facilitate the commission of the
21 violation.

22 18. Upon conviction of the offense set forth in Count 2 of this
23 Indictment, defendant HUA WANG shall forfeit to the United States of
24 America, pursuant to Title 18, United States Code, Section 982(a)(1),
25 any property, real and personal, involved in the offense, and any
26 property traceable to such property.

27 19. If any of the above-described forfeitable property, as a
28 result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the property listed above as being subject to forfeiture.


All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), 982(a)(2)(A), and 2328(a), and Title 28, United States Code, Section 2461(c).

DATED: April 4, 2025.

A TRUE BILL.



ANDREW R. HADEN
Acting United States Attorney

By: 
P. KEVIN MOKHTARI
Assistant U.S. Attorney