

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20059-CR-ALTONAGA/REID(s)(s)
18 U.S.C. § 1001(a)(2)

UNITED STATES OF AMERICA

vs.

CHENGZHE WANG,

Defendant.

FILED BY BM D.C.

Apr 1, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

Material False Statement to Government Agency
(18 U.S.C. § 1001(a)(2))

From on or about January 14, 2025, through on or about January 15, 2025, at the Miami International Airport, in Miami-Dade County, in the Southern District of Florida, in a manner within the jurisdiction of the United States Customs and Border Protection, an agency of the executive branch of the United States Government, the defendant,

CHENGZHE WANG,

did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact, in that, he falsely represented that his employer is a privately-owned company with no ties to the Chinese government; he was no longer a member of the Communist Youth League of China; and that his 2023 trip from Seoul, South Korea, to Dallas, Texas, was for vacation and to visit a friend, when, in truth and in fact, as the defendant knew, his employer is at least partly owned by the Chinese government; he is still an active member of the Communist Youth League of China; and his 2023

trip from Seoul, South Korea, to Dallas, Texas, was for the purpose of attending business meetings in Houston, Texas, in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL



FOREPERSON

[Handwritten signature] for:

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

[Handwritten signature] for:

AJAY J. ALEXANDER
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CHENGZHE WANG

Case No: 25-20059-CR-ALTONAGA(s)(s)

Count 1

Material False Statement to Government Agency

Title 18, United States Code, Section 1001(a)(2)

* **Max. Term of Imprisonment:** 5 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 1 year

* **Max. Fine:** \$250,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.