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MAR 28 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

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Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CR 19 70468 MAG

UNITED STATES OF AMERICA,
Plaintiff,
v.
WEIYUN HUANG
also known as "Kelly Huang"
Defendant.

CRIMINAL NO.

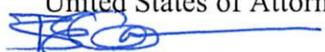
NOTICE OF PROCEEDINGS ON
OUT-OF-DISTRICT CRIMINAL
CHARGES PURSUANT TO RULES
5(c)(2) AND (3) OF THE FEDERAL RULES
OF CRIMINAL PROCEDURE

Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal
Procedure that on 3/26/19, the above-named defendant was arrested based upon an
arrest warrant (copy attached) issued upon an

Indictment Information Criminal Complaint Other _____
pending in the Northern District of Illinois, Case Number 19CR275.

In that case, the defendant is charged with a violation(s) of Title(s) 18 United States Code,
Section(s) 371.

Description of Charges: Conspiracy to commit visa fraud.

Respectfully Submitted.
United States of Attorney

Assistant U.S. Attorney

Dated: 3/28/19

DOCUMENT NO. _____
DATE _____
INITIALS DL
DISTRICT COURT
CRIMINAL CASE NO. _____

RECEIVED

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Peter S. Salib (312) 697-4092

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAR 26 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

WEIYUN HUANG,
also known as "Kelly Huang"

CASE NUMBER:
~~UNDER SEAL~~

19CR 275

CRIMINAL COMPLAINT MAGISTRATE JUDGE COLE

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about May 4, 2016, to on or about March 25, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 371	conspiracy to commit visa fraud

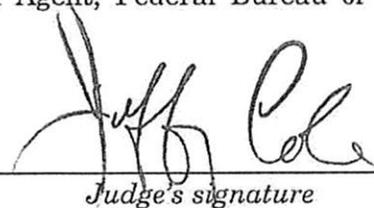
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

ANDREW K. MCKAY
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: March 26, 2019



Judge's signature

City and state: Chicago, Illinois

JEFFREY COLE, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

ss

AFFIDAVIT

I, ANDREW K. MCKAY, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since approximately August 2014. My current responsibilities include the investigation of criminal violations relating to espionage offenses, including the gathering or delivery of defense information to aid a foreign government or agent, in violation of Title 18, United States Code, Section 794(a), and individuals who act as a foreign agent without notice to the Attorney General, in violation of Title 18, United States Code, Section 951(a). I have conducted investigations involving the use of the Internet, email, and social media to further criminal activity.

2. This affidavit is submitted in support of a criminal complaint alleging that WEIYUN HUANG, also known as "Kelly Huang," has violated Title 18, United States Code, Section 371. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HUANG with conspiracy to commit visa fraud, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents the information obtained during an ongoing investigation related to the defendant and other individuals.

Background

4. Title 18, United States Code, section 1546(a) (visa fraud), makes it a criminal offense for any person that knowingly forges, counterfeits, alters, or falsely makes any immigrant or nonimmigrant visa, permit, border crossing card, alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, or utters, uses, attempts to use, possesses, obtains, accepts, or receives any such visa, permit, border crossing card, alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, knowing it to be forged, counterfeited, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained.

The U.S. Visa Program

5. The following information was obtained from the following U.S. Department of State website: travel.state.gov/content/travel/en/us-visas and the U.S. Citizenship and Immigration Services website: www.uscis.gov.

a. A citizen of a foreign country (a foreign national) who seeks to enter the United States generally must first obtain a U.S. visa, which is placed in the traveler's passport, a travel document issued by the traveler's country of citizenship.

b. An F-1 visa permits a foreign national to study in the United States at university, college, high school, elementary school, seminary, conservatory, or other academic institution. Before applying for an F-1 visa, students must first be accepted by a Student and Exchange Visitor Program (SEVP) approved school. After the SEVP-approved school accepts a foreign national as a student, the student will be registered in the Student and Exchange Visitor Information System (SEVIS). The SEVP-approved school will issue the student a Form I-20 "Certificate of Eligibility for Nonimmigrant Student Status – For Academic and Language Students." After the student receives the Form I-20 and registers in SEVIS, the student may apply at a U.S. Embassy or Consulate for a student (F or M) visa. The student must present the Form I-20 to the consular officer during the visa interview.

c. The Optional Practical Training (OPT) is temporary employment that is directly related to an F-1 student's major area of study. An F-1 student could be authorized to receive up to a total of 12 months of practical training either before and/or after completion of studies. The post-completion OPT must be directly related to the student's major area of study. F-1 students who receive science, technology, engineering, and mathematics (STEM) degrees included on the STEM Designated Degree Program List, are employed by employers enrolled in E-Verify, and who have received an initial grant of post-completion OPT related to such a degree, may apply for a 24-month extension. A student must submit a Form I-983 Training Plan for STEM OPT Students in order to apply for the post-completion STEM OPT.

d. An L-2 visa permits a foreign national to work at a branch, parent, affiliate, or subsidiary of the current employer in a managerial or executive capacity, or in a position requiring specialized knowledge. Individual must have been employed by the same employer abroad continuously for 1 year within the three preceding years.

e. A B-1 and B-2 visas are visitor visas, which are nonimmigrant visas for persons who want to enter the United States temporarily for business (visa category B-1), for tourism (visa category B-2), or for a combination of both purposes (B-1/B-2).

f. A foreign national must complete a Form DS-160 nonimmigrant visa application to apply for a visa.

Findream, LLC

6. According to the California Secretary of State records, Findream, LLC was incorporated on or about August 30, 2013, by WEIYUN HUANG, with a listed address of 800 W. El Camino Real, Suite 180, Mountain View, California. On or about July 27, 2015, Findream filed a "Statement of Information," in which HUANG listed herself as Findream's CEO, and Individual AW¹ as Findream's manager. California Corporate Agents, Inc. was listed as Findream's registered agent. On or about July

¹ Law enforcement has identified a person with the name of Individual AW who previously resided at an address associated with Findream, LLC. However, as explained in more detail below, it appears that by no later than 2018, HUANG had begun using Individual AW's name as an alias.

13, 2017, Findream filed a “Statement of No Change,” in which Kelly HUANG was listed as the CEO and preparer of the “Statement of No Change.”

7. According to information obtained from open source databases, HUANG also uses the name “Kelly HUANG.”

8. According to information published on the Worldbase Records from Dun & Bradstreet, Inc., HUANG is presently listed as the “Principal” for Findream, with the same above-listed address in Mountain View, California.

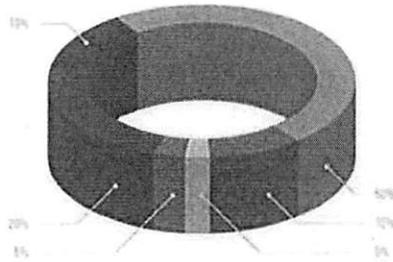
9. According to information obtained from open source databases, the address 800 W. El Camino Real, Suite 180, Mountain View, California is associated with a Regus² office space for rent.

10. On or about March 25, 2019, agents visited the website www.findream.us, and observed the following webpage:



11. When agents scrolled down on the homepage for Findream.us, the following appeared on the same homepage:

² According to Regus’s website, it provides ready-to-use office workspace and co-work space.



OUR SERVICES

We provide knowledge training, web development, software development, QA test, Data Analyst, Business Consulting, Management Consulting and Coding Platform Services.

[Read More](#)

About Us

Findream is a startup company in technology services and consulting. We enable clients in China and USA to create and execute strategies for their digital transformation. From engineering to application development, knowledge management and business process management, we help our clients find the right problems to solve, and to solve these effectively. Our team of 200+ innovators, across the globe, is differentiated by the imagination, knowledge and experience, across industries and technologies that we bring to every project we undertake.

Our services include knowledge training, web development, software development, QA test, Data Analyst, Business Consulting, and Coding Platform.

[Read More](#)



12. Under the “About” tab on the homepage, the following appears under a header entitled “Our Team” that included the photograph, name, title, and job description of each individual:



13. When agents did a Google “reverse image search”³ for each of the photographic images contained under “Our Team,” on the Findream.us website, they discovered that each of the four images of the persons on the page was a “stock image,”⁴ associated with a range of miscellaneous websites. In other words, the images did not appear to be images of the persons Findream purported them to be on its website. The following is an example of the reverse lookup search performed for the image purporting to be “[Individual AW], HR.”

³ Based on my training and experience, I know that a “reverse image search” is a search engine technology that takes an image file as an input query and returns results related to the image. Google is a search engine that offer reverse image capability.

⁴ Based on my training and experience, I know that a “stock image,” is an image that is commercially available or otherwise available on the internet and may be licensed for use.

15. When agents performed a Google search of the phone number 650-288-1224, the Findream website was the third listed result, while the first listed result was for the website www.chineselookingforjob.com.

www.chineselookingforjob.com

16. On or about March 25, 2019, agents visited the website www.chineselookingforjob.com, and discovered the website is predominately in the Chinese language. The following excerpts from the website www.chineselookingforjob.com are based upon draft English translations of the Chinese writing on the website completed by interpreters employed by the FBI:

FAQ regarding OPT affiliation (key points!)

Q: What are included in the first year OPT affiliation?

A: We charge one time membership fee of \$200, which includes *Offer*, employee admission procedure and follow up *Background Check* . . .

Q: Are you a legal entity?

A: Our company headquarters is located in New York, with branch offices in Silicon Valley, Chicago and Los Angeles. Our business is IT consultation. We maintain good tax reporting records, is Everify. We possess H1B for employees, green card (generally, some so-called affiliation companies are unable to do all these). Our customers are all over China and the U.S., [they] need large amount of workers to complete tasks. While helping students resolve status issues, we also provide qualified students work, both Paid and Unpaid, in CS, statistics and math.

Q: What is OPT affiliation?

A: The theory behind affiliation is finding a company, become an employee, and then send the company's information to the school, which will then enter your information to your SEVIS system. When you receive I20, [you] will see that this company is on I20. By doing so, USCIS will think your status is legal.

Q: Do I need affiliation?

A: Under the new 2016 policy, the school and USCIS have strict regulations for graduates. Students not working 90 days after EAD card is issued will have difficulty applying for H1B or OPT-Extension might be rejected. For security reasons, we suggest all graduates wishing to stay in the U.S. find companies to affiliate to prevent future risks.

Q: What are the benefits of affiliation?

A: Since affiliation is "pretend" work, inexperienced students usually do not write as work experience in resumes. If this part is well prepared, it will look real. We have seen some students doing so and they found satisfying job after all.

Q: Able to provide OPT Extension affiliation?

A: Yes, but number is limited. Please send resume to customer service Email: optguakaoca@gmail.com.

Our Main Goal

Chineselookingforjob.com is a branch office that mainly provides consultation to job seekers in the U.S. The company has "North American jobseekers" WeChat subscription number, media and training services. The goal is to help overseas Chinese find jobs after graduation. We have large Mentor networks in all major companies in the U.S. to provide suggestions and service to graduating Chinese students. In the past two years, CLFJ has helped more than 200 students with job related issues. We will continue providing the best service to overseas Chinese in the future.

Get Involved

Contact Us

optguakaoca@gmail.com

WeChat subscription number: (North American jobseekers)

Phone number: 650-288-1224

17. Based upon the draft translation of the website, my training and experience, and the information obtained from the investigation to date, it appears that the entire purpose of chineselookingforjob.com is to provide false verifications of employment for Chinese nationals who are F-1 visa holders seeking to continue their stay in the United States via the OPT program. Indeed, the website characterizes

OPT affiliation as “pretend” employment, and specifically indicates the intent to convince the United States Citizenship and Immigration Services (USCIS) that the individual’s status is “legal.” Further, according to Google’s “translate” feature, the term “gua kaoca” means “affiliated.” Therefore, the email address optguakaoca@gmail.com includes the words “OPT” and the Chinese word for “affiliated” in its handle.

18. Based on my training and experience, I believe that if a Chinese national sought placement services from chineselookingforjob.com, that individual would be given Findream as their “affiliated” employer to list on their relevant visa paperwork.

19. Notably, since Findream’s creation in approximately 2013, based upon a search of the SEVIS system, approximately 1,900 F-1 visa-holders have listed Findream as an employer on their OPT forms, including JI Chaoqun, discussed further below.

WEIYUN (“KELLY”) HUANG

20. According to the Department of State, on or about May 21, 2009, HUANG, was issued a 12-month F-1 visa for her to study at the University of Mississippi. She was issued additional 12-month F-1 visas for her studies at the University of Mississippi through 2014. On all of HUANG’s F-1 visa applications after 2010, HUANG listed kelly0710@gmail.com as her email address.

21. According to the Department of Homeland Security, on or about June 17, 2014, HUANG was issued a 24-month L-2 visa to accompany her husband

during his sponsored employment in the United States. On the June 2014 L-2 visa application, HUANG listed Findream as her employer.

22. According to the Google subscriber records for optguakaoca@gmail.com, the recovery email for optguakaoca@gmail.com is kelly0710@gmail.com. The kelly0710@gmail.com email account is the same one used by HUANG, as detailed above. HUANG is thus connected to both chineselookingforjob.com and Findream, the latter of which she is the founder.

23. Based upon a review of email search warrants and subpoena returns, from approximately August 2013 to approximately March 2018, Findream deposited approximately \$584,269 into its bank accounts, approximately \$317,766 of which came from accounts held by HUANG.

24. Based upon a review of email search warrants and subpoena returns, from approximately May 2013 to approximately June 2018, HUANG deposited approximately \$1.64 million into her own bank accounts, including over \$985,000 received from individuals via peer-to-peer payments services, such as PayPal and Venmo. Findream directed "employees" to submit the application fee via PayPal among other services to HUANG directly. During that same timeframe, HUANG spent over \$715,000 on credit card bills. Her credit card spending activity included significant expenditures at luxury retail stores, such as Neiman Marcus, Louis Vuitton, Hermès, Chanel, and Prada. As a result, HUANG appears to be operating Findream for her own personal gain. Based on a review of the bank records, there

appears to be only a small amount of possibly legitimate business expenses, other than payments to Regus for office space.

JI CHAOQUN

25. According to the Department of State, on or about August 28, 2013, JI CHAOQUN was born in China and arrived in the United States from Beijing, China, on a 12-month F-1 Visa, for the purpose of studying in the United States at a university in Chicago ("University A"). On or about January 30, 2015, JI was issued his second 12-month F-1 visa for continued study at University A. JI submitted the requisite I-20 Forms in support of each F-1 visa. In 2015, he received his Master's Degree in Electrical Engineering at University A.

26. In anticipation of his graduation in December 2015, on or about October 20, 2015, JI submitted an I-20 Form seeking authorization to pursue post-completion Optional Practical Training (OPT) for the time period of February 17, 2016 through February 16, 2017.

27. According to University A, on or about November 28, 2016, JI submitted a Form I-983 Training Plan for STEM OPT Students for the timeframe of February 17, 2017, through February 16, 2019, which included, but not limited to, the following information:

a. In Section 2, JI certified under penalty of perjury the accuracy of the statements contained in the Form I-983.

b. In Section 3, JI listed his employer as Findream, LLC, with an address at 800 W El Camino Real, Suite 180, Mountain View, CA, and a website

address of www.findream.us. JI listed his start date as November 14, 2016, that he was scheduled to work 25 hours per week, and that his salary was \$20 per hour, to be paid on a monthly basis.

c. In Section 4, an individual purporting to be “[Individual AW], Director of Human Resources,” certified on behalf of Findream under penalty of perjury that JI was an employee of Findream and that JI and Findream would comply with the requirements of the STEM OPT program.

d. In Section 5, JI listed his employment at Findream’s Chicago Office at 55 East Monroe Street, Suite 3800. The local Findream official listed was qxin@findreamllc.com. Under the “Student Role” portion of Section 5, the following is an excerpt of what is written: “This student works as a software engineer in our company, her⁶ job duties includes but not limited to the following, write well designed, testable, efficient code by using best software development practices”

e. In Section 6, a person purporting to be Individual AW again certified on behalf of Findream under penalty of perjury that the information contained in this STEM OPT Training Plan was true and correct.

f. On or about February 19, 2018, JI and a person purporting to be Individual AW certified under penalty of perjury an evaluation of JI’s progress to date.

⁶ This is the wrong gender for JI, which, based on my training and experience, is further evidence that Findream did not know who they were allegedly employing.

g. Based upon a review of email search warrants and subpoena returns associated with HUANG and Findream, from May 2013 to June 2018, there are no records of Individual AW receiving income from Findream or HUANG.

h. Based upon my training and experience, and records obtained via grand jury subpoena and/or court authorization, I believe HUANG uses the name of Individual AW to verify some human resources documents related to Findream in an effort to legitimize the company by appearing large enough to necessitate having a "Human Resources Manager." I also believe that HUANG is using Individual AW's name as an alias and is personally handling most of the administrative functions related to Findream. Specifically, Google records reveal that email addresses associated with HUANG are linked by cookies to email addresses associated with Individual AW. Additionally, logins to email addresses associated with HUANG and Individual AW came from the exact same IP addresses within minutes of each other.

i. An email search warrant for kelly0710@gmail.com revealed two documents related to JI Chaoqun's purported employment with Findream stored in the Google Drive⁷ for kelly0710@gmail.com. The first document is an "Employment Offer Letter" dated April 4, 2016, and purportedly signed by Individual AW. The

⁷ According to Google, Google Drive is a file storage and synchronization service developed by Google. Launched on April 24, 2012, Google Drive allows users to store files on their servers, synchronize files across devices, and share files. In addition to a website, Google Drive offers apps with offline capabilities for Windows and macOS computers, and Android and iOS smartphones and tablets. Google Drive encompasses Google Docs, Sheets, and Slides, an office suite that permits collaborative editing of documents, spreadsheets, presentations, drawings, forms, and more. Files created and edited through the office suite are saved in Google Drive.

second document is an "Employment Verification Letter" dated January 9, 2017, and purportedly signed by Individual AW.

28. According to the Department of State, on or about January 9, 2017, JI executed another I-20 Form, in which he stated that he began Post-Completion OPT employment at Findream, LLC, on April 25, 2016, and was authorized for STEM OPT employment at Findream, LLC, until February 17, 2019.

29. On or about May 1, 2018, agents visited the Findream Chicago office, purportedly located at 55 East Monroe Street, Suite 3800. The security guard/receptionist for the building was unfamiliar with any company named "Findream." The security guard stated that Suite 3800 contained a Regus office location. At the Regus office at Suite 3800, a Regus receptionist also stated that she was unfamiliar with any company named "Findream." The receptionist stated she knew most of her clients at that location and never heard of "Findream", she also conducted internal database checks and could find no records for "Findream" for the Regus office at 55 E. Monroe St., Suite 3800.

30. According to JI's Chase bank records, on or about November 17, 2016, JI paid Findream LLC \$900, which, as discussed below, appeared to be a payment for the verifications of employment contained on JI's OPT forms. A review of JI's bank account records at Chase, Citibank, and Bank of America revealed no income from Findream. Based on the investigation to date, these three bank accounts are the only U.S.-based bank accounts held by JI.

31. According to records obtained via subpoena for HUANG's Chase bank records, on or about May 4, 2016, HUANG's personal account received \$200 from JI via Chase Quickpay, which appears to be consistent with the affiliation fee. According to subpoena records for HUANG's Bank of America bank records, on or about November 17, 2016, HUANG's personal account received \$900 from JI via Chase Quickpay. These payments and timing are consistent with JI's start date listed on the I-983 of November 14, 2016, and the start date listed on the Employment Verification Letter of November 17, 2016.

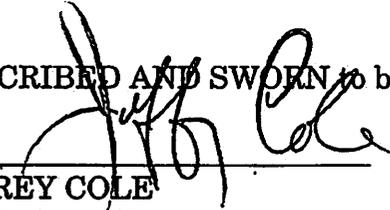
32. On or about September 25, 2018, JI was arrested and charged by complaint in this district with acting as an agent of a foreign government, namely the People's Republic of China, without prior notice to the Attorney General, in violation of Title 18, United States Code, Section 951(a) (case number 18 CR 611, Guzman, J.). JI waived his *Miranda* rights and participated in a post-arrest interview. During that interview, JI acknowledged that he paid Findream \$900, that he never actually worked for Findream, that he was never paid by Findream, and that he used the company to falsely verify his employment on the OPT form in order to fraudulently extend his stay in the United States.

33. Based on the investigation of Findream to date, Findream appears to be a company on paper only, with no actual physical presence, and was created for the sole purpose of providing false verifications of employment to F-1 visa holders seeking to extend their stay in the U.S. via the OPT program.

FURTHER AFFIANT SAYETH NOT.

ANDREW K. MCKAY
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on March 26, 2019.



JEFFREY COLE
United States Magistrate Judge

AO 442 (Rev. 11/11) Arrest Warrant

AUSA Peter S. Salib (312) 697-4092

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

WEIYUN HUANG
also known as "Kelly Huang"

WARRANT FOR ARREST

CASE NUMBER:

19CR 275

UNDER SEAL

MAGISTRATE JUDGE COLE

To: The United States Marshal and Any Authorized Officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay WEIYUN HUANG, also known as "Kelly Huang," who is accused of an offense or violation based on the following document filed with the court:

Complaint

This offense is briefly described as follows:

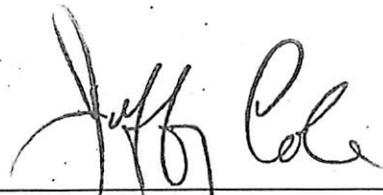
conspiracy to commit visa fraud

Title 18, United States Code, Section 371.

Date: March 26, 2019

City and state: Chicago, Illinois

Bail fixed at \$ _____ by _____



Issuing Officer's signature

JEFFREY COLE, U.S. MAGISTRATE JUDGE

Printed name and title

Name of Judicial Officer

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____

at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title