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8	UNITED STATES DISTRICT COURT	
9	SOUTHERN DISTRICT OF CALIFORNIA	
10	UNITED STATES OF AMERICA,	Case No. <u>13CR3487-WQH</u>
11	Plaintiff,	$ \underbrace{I \ \underline{N} \ \underline{F} \ \underline{O} \ \underline{R} \ \underline{M} \ \underline{A} \ \underline{T} \ \underline{I} \ \underline{O} \ \underline{N} }_{(Superseding)} $
12	v.	
13	JING WANG (1),	Title 15, U.S.C., Secs. 78j(b), 78ff, and Title 17, C.F.R.,
14	Defendant.	Sec. 240.10b-5 - Securities Fraud (Insider Trading); Title 18,
15		U.S.C., Sec. 1956(a)(1)(B)(i) - Money Laundering; Title 18, U.S.C., Sec. 2 - Aiding and
16		Abetting; Title 18, U.S.C., Secs. 982(a)(1) and 981(a)(1)(C), and
17 18		Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture
19	The United States Attorney charges:	
20	Count 1 - Securities Fraud (Insider Trading)	
21	(15 U.S.C. §§ 78j(b), 78ff; 17 C.F.R. § 240.10b-5)	
22	On or about December 6, 2010, within the Southern District of	
23	California and elsewhere, defendant JING WANG willfully and knowingly,	
24	directly and indirectly, by the use of the means and instrumentalities	
25	of interstate commerce and of the facilities of national securities	
26	exchanges, in connection with the purchase and sale of securities, die	
27	use and employ manipulative and deceptive devices and contrivances, in	
28	violation of Title 17, Code of Federal Regulations, Section 240.10b-5,	

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(a) employing devices and schemes to defraud; (b) making untrue by: 1 statements of material facts and omitting to state material facts; and 2 (c) engaging in acts, practices, and courses of business which 3 operated as a fraud and deceit upon any person - to wit, on the basis 4 5 of inside information that JING WANG used in breach of: (a) the fiduciary duty of trust and confidence owed directly, indirectly, and 6 derivatively to Qualcomm, Inc., its shareholders, and any other source 7 of the inside information; (b) the expectations of confidentiality of 8 Qualcomm; and (c) Qualcomm's written policies regarding the use and 9 safekeeping of confidential and material, nonpublic information, JING 10 WANG executed and caused to be executed the purchase of 10,800 shares 11 of stock in Atheros Communications, Inc., an "issuer" of securities 12 under the federal securities laws, using a secret brokerage account in 13 the name of Unicorn Global Enterprises, Ltd. 14

All in violation of Title 15, United States Code, Sections 78j(b) and
78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5,
and Title 18, United States Code, Section 2.

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Count 2 (Money Laundering)

(18 U.S.C. § 1956(a)(1)(B)(i))

On or about February 23, 2012, within the Southern District of 3 California and elsewhere, defendant JING WANG did knowingly conduct a 4 financial transaction affecting interstate commerce - that is, а 5 \$200,000 transfer from Unicorn Global Enterprises, Ltd. Account 6 Lynch to Clearview Resources, XXXX7A66 at Merrill Ltd. Account 7 XXXX2A09 at Merrill Lynch - which involved the proceeds of a specified 8 unlawful activity, to wit, wire fraud, knowing that the transaction 9 was designed in part to conceal and disguise the source, ownership, 10 and control of the proceeds of said specified unlawful activity, and 11 that while conducting such financial transaction knew that the 12 property involved in the financial transaction represented the 13 proceeds of some form of unlawful activity. 14

15 All in violation of Title 18, United States Code, 16 Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE ALLEGATION

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in Count 2 of this Superseding Information, defendant JING WANG shall forfeit to the United States of America any property, real or personal, involved in such offenses, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

1. \$529,079.50 previously held by Merrill Lynch in Account Number xxx02A09, in the name of Clearview Resources, Ltd.

If any of the property described above, as a result of any act or omission of the defendant: cannot be located upon the exercise of due

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diligence; has been transferred or sold to, or deposited with, a third 1 party; has been placed beyond the jurisdiction of the court; has been 2 substantially diminished in value; or has been commingled with other 3 property which cannot be divided without difficulty, the United States 4 of America shall be entitled to forfeiture of substitute property 5 United pursuant to Title 21, States Code, Section 853(p), as 6 incorporated by Title 18, United States Code, Section 982(b)(1) and 7 Title 28, United States Code, Section 2461(c), up to the full amount 8 of forfeitable property described above. 9 All pursuant to Title 18 United States Code, Section 982(a)(1). 10 DATED: 21 11 2014. 12 LAURA E. DUFFY JEFFREY H. KNOX United States Attorney Chief, Fraud Section 13

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BESTE TRTC 16 JOHN N. PARMLEY Assistant U.S. Attorneys 17

Criminal Division U.S. Department of Justice

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P. McDONALD TAMES fyial Attorney pecial Assistant U.S. Attorney