

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 JING WANG (1),
14 Defendant.

Case No. 13CR3487-WQH

I N F O R M A T I O N
(Superseding)

Title 15, U.S.C., Secs. 78j(b),
78ff, and Title 17, C.F.R.,
Sec. 240.10b-5 - Securities Fraud
(Insider Trading); Title 18,
U.S.C., Sec. 1956(a)(1)(B)(i) -
Money Laundering; Title 18,
U.S.C., Sec. 2 - Aiding and
Abetting; Title 18, U.S.C., Secs.
982(a)(1) and 981(a)(1)(C), and
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, did
27 use and employ manipulative and deceptive devices and contrivances, in
28 violation of Title 17, Code of Federal Regulations, Section 240.10b-5,

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

15 All in violation of Title 15, United States Code, Sections 78j(b) and
16 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5,
17 and Title 18, United States Code, Section 2.

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

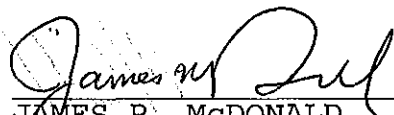
10 All pursuant to Title 18, United States Code, Section 982(a)(1).

11 DATED: July 21, 2014.

12 LAURA E. DUFFY
13 United States Attorney

JEFFREY H. KNOX
Chief, Fraud Section
Criminal Division
U.S. Department of Justice

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16 ERIC BESTE
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17 Trial Attorney
Special Assistant U.S. Attorney