

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA |) | Criminal No. _____ |
| |) | |
| v. |) | Violations: |
| |) | |
| CHARLES LIEBER, |) | <u>Counts One and Two:</u> |
| |) | False Statements |
| Defendant |) | (18 U.S.C. § 1001(a)(2)) |
| |) | |

INDICTMENT

COUNT ONE

False Statements
(18 U.S.C. § 1001(a)(2))

The Grand Jury charges:

On or about April 24, 2018, in the District of Massachusetts, the defendant,

CHARLES LIEBER,

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, which LIEBER then knew to be false, that is, LIEBER told investigators from the Department of Defense, Defense Criminal Investigative Service, that he was never asked to participate in China's Thousand Talents Program, and that he "wasn't sure" how China categorized him, when, in fact, LIEBER had previously been asked by representatives of Wuhan University of Technology ("WUT") in China to participate in China's Thousand Talents Program and, in or about July 2012, signed a three-year contract with WUT entitled "Employment Contract of 'One Thousand Talent' High Level Foreign Expert."

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO
False Statements
(18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

On or about January 10, 2019, in the District of Massachusetts, the defendant,

CHARLES LIEBER,

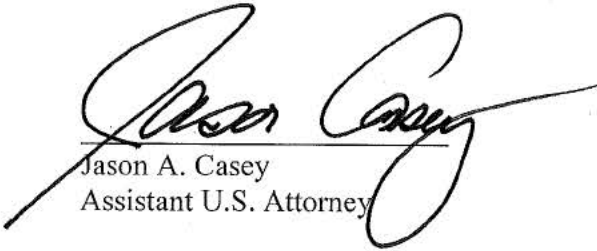
knowingly and willfully made and caused to be made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, which LIEBER then knew to be false, that is, LIEBER caused Harvard University to tell the National Institutes of Health (“NIH”) that LIEBER “[wa]s not and has never been a participant in” China’s Thousand Talents Program, when, in fact, LIEBER had signed a three-year Thousand Talents Agreement with WUT entitled “Employment Contract of ‘One Thousand Talent’ High Level Foreign Expert” in or about July 2012.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL



FOREPERSON

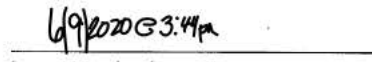


Jason A. Casey
Assistant U.S. Attorney

District of Massachusetts: June 9, 2020
Returned into the District Court by the Grand Jurors and filed.



DEPUTY CLERK



Date and Time