

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MATTHEW BLAKE MORROW-WU,
a/k/a "Matthew Blake Morrow,"
a/k/a "Matthew Wu,"
a/k/a "Matthew Morrow-Wu,"
a/k/a "Blake Wu," and

SHANGZHEN WU,
a/k/a "Daniel Wu,"

Defendants.

INDICTMENT

23 Cr.

COUNT ONE

(Conspiracy to Commit Wire Fraud and Mail Fraud)

The Grand Jury charges:

1. From at least in or about January 2022 up to and including at least in or about October 2022, in the Southern District of New York and elsewhere, MATTHEW BLAKE MORROW-WU, a/k/a "Matthew Blake Morrow," a/k/a "Matthew Wu," a/k/a "Matthew Morrow-Wu," a/k/a "Blake Wu," and SHANGZHEN WU, a/k/a "Daniel Wu," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree, together and with each other, to commit wire fraud, in violation of Title 18, United States Code, Section 1343, and mail fraud, in violation of Title 18, United States Code, Section 1341.

2. It was a part and object of the conspiracy that MATTHEW BLAKE MORROW WU, a/k/a "Matthew Blake Morrow," a/k/a "Matthew Wu," a/k/a "Matthew Morrow-Wu," a/k/a "Blake Wu," and SHANGZHEN WU, a/k/a "Daniel Wu," the defendants, and others known and

unknown, knowingly having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

3. It was further a part and object of the conspiracy that MATTHEW BLAKE MORROW-WU, a/k/a "Matthew Blake Morrow," a/k/a "Matthew Wu," a/k/a "Matthew Morrow-Wu," a/k/a "Blake Wu," and SHANGZHEN WU, a/k/a "Daniel Wu," the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did take and receive therefrom, such matters and things, and would and did cause to be delivered by mail and such carriers according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Wire Fraud)

The Grand Jury further charges:

4. From at least in or about January 2022 up to and including at least in or about March 2022, in the Southern District of New York and elsewhere, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” the defendants, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” engaged in a scheme to defraud an architectural firm located in Manhattan, New York (“Company-1”) at which SHANGZHEN WU, a/k/a “Daniel Wu,” was employed as a business manager by attempting to embezzle at least \$91,980 from Company-1’s bank account, including through the use of wire transmissions to further the embezzlement scheme.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE
(Mail Fraud)

The Grand Jury further charges:

5. From at least in or about January 2022 up to and including at least in or about October 2022, in the Southern District of New York and elsewhere, MATTHEW BLAKE

MORROW WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive therefrom, such matters and things, and did cause to be delivered by mail and such carriers, according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, to wit, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” caused a fictitious letter falsely purporting to be from the United States Attorney for the Southern District of New York to be sent and delivered by the Postal Service to Company-1’s offices in Manhattan, New York on or about October 24, 2022 in furtherance of a scheme to defraud Company-1.

(Title 18, United States Code, Sections 1341 and 2.)

COUNT FOUR
(Impersonating a Federal Officer)

The Grand Jury further charges:

6. In or about October 2022, in the Southern District of New York and elsewhere, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,”

the defendants, falsely assumed and pretended to be officers and employees acting under the authority of the United States and a department, agency and officer thereof, and acted as such, to wit, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” caused a fictitious letter falsely purporting to be from the United States Attorney for the Southern District of New York in his capacity as such to be sent and delivered to Company-1’s offices in Manhattan, New York.

(Title 18, United States Code, Sections 912 and 2.)

COUNT FIVE
(Aggravated Identity Theft)

The Grand Jury further charges:

7. From at least in or about January 2022 up to and including at least in or about October 2022, in the Southern District of New York and elsewhere, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” used the names, signatures, and business titles of other persons during and in relation to the conspiracy to commit mail fraud and wire fraud charged in Count One of this Indictment, the wire fraud charged in Count Two of this Indictment, and the mail fraud charged in Count Three of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

FORFEITURE ALLEGATIONS

8. As a result of committing the offenses alleged in Counts One through Three of this Indictment, MATTHEW BLAKE MORROW-WU, a/k/a “Matthew Blake Morrow,” a/k/a “Matthew Wu,” a/k/a “Matthew Morrow-Wu,” a/k/a “Blake Wu,” and SHANGZHEN WU, a/k/a “Daniel Wu,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from, proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

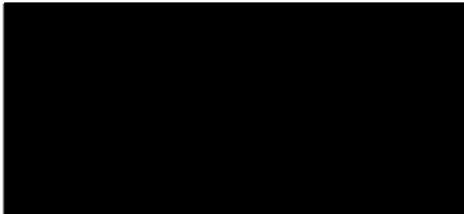
9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)




DAMIAN WILLIAMS
United States Attorney