

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO:

17-20449-CR-ATTONAGA-
GOODMAN

18 U.S.C. § 287
18 U.S.C. § 209(a)
18 U.S.C. § 216(a)(2)

UNITED STATES OF AMERICA

vs.

CHUNZAI WANG,

Defendant.

FILED BY _____	D.C.
JUN 29 2017	
STEVEN M. LARIMORE CLERK U.S. DIST. CT. S.D. OF FLA. FT. LAUD.	

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. Defendant **CHUNZAI WANG** ("WANG") was a Research Oceanographer at the National Oceanic and Atmospheric Administration ("NOAA"), Atlantic Oceanographic and Meteorological Laboratory ("AOML"), located in Miami, Florida.
2. NOAA was an agency of the United States Department of Commerce within the executive branch of the United States Government.
3. AOML was a federal research laboratory facility that conducted work related to hurricanes, coastal ecosystems, climate studies, global carbon systems, and ocean observations.
4. **WANG** conducted basic and applied research at NOAA/AOML on the coupled ocean atmospheric system to understand the factors affecting both climate and the environment.

COUNTS 1-5
False, Fictitious, or Fraudulent Claims
(18 U.S.C. § 287)

1. The General Allegations portion of this Indictment is realleged and reincorporated by reference as if fully set forth herein.

2. On or about the dates set forth below as to each Count set forth herein, in Miami-Dade County, in the Southern District of Florida, the defendant,

CHUNZAI WANG,

did knowingly make, cause to be made, and presented claims to a department or agency of the United States, that is, NOAA/AOML, knowing that the claims were false and fraudulent, in that the defendant made, caused to be made, and submitted a time and attendance report claiming wages for official work for the dates specified below, when the defendant knew that he had not performed official work and had been on personal travel, as follows:

COUNT	DATE SUBMITTED BY WANG	DATES FALSELY CLAIMED AS OFFICIAL WORK DAYS
1	June 29, 2012	June 25, 2012, through June 29, 2012
2	July 12, 2012	July 2, 2012, through July 9, 2012
3	March 7, 2013	February 25, 2013
4	July 12, 2013	July 5, 2013, through July 12, 2013
5	July 29, 2013	July 15 2013, through July 16, 2013

In violation of Title 18, United States Code, Section 287.

COUNT 6
Illegal Supplementation of Government Salary
(18 U.S.C. §§ 209(a) and 216(a)(2))

1. The General Allegations portion of this Indictment is realleged and reincorporated by reference as if fully set forth herein.

2. From on or about March 1, 2010, and continuing until on or about February 28, 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CHUNZAI WANG,

being an employee of NOAA/AOML, a bureau of the United States Department of Commerce, within the executive branch of the United States Government, did knowingly and willfully receive any salary, and contribution to and supplementation of salary, as compensation for his services as an employee of NOAA/AOML, from a source other than the Government of the United States, that is, the People's Republic of China, Changjiang Scholars Program, in violation of Title 18, United States Code, Sections 209(a) and 216(a)(2).

COUNT 7

**Illegal Supplementation of Government Salary
(18 U.S.C. §§ 209(a) and 216(a)(2))**

1. The General Allegations portion of this Indictment is realleged and reincorporated by reference as if fully set forth herein.

2. From on or about February 6, 2012, and continuing until in or about April 2016, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CHUNZAI WANG,

being an employee of NOAA/AOML, a bureau of the United States Department of Commerce, within the executive branch of the United States Government, did knowingly and willfully receive any salary, and contribution to and supplementation of salary, as compensation for his services as an employee of NOAA/AOML, from a source other than the Government of the United States, that is, the People's Republic of China, 973 Program, in violation of Title 18, United States Code, Sections 209(a) and 216(a)(2).

COUNT 8

**Illegal Supplementation of Government Salary
(18 U.S.C. §§ 209(a) and 216(a)(2))**

1. The General Allegations portion of this Indictment is realleged and reincorporated

by reference as if fully set forth herein.

2. From on or about June 9, 2013, and continuing until in or about April 2016, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

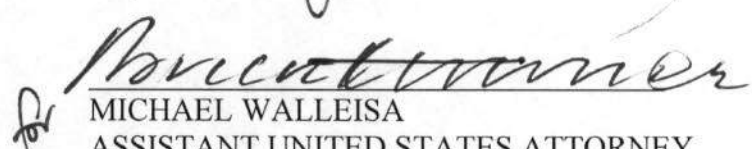
CHUNZAI WANG,

being an employee of NOAA/AOML, a bureau of the United States Department of Commerce, within the executive branch of the United States Government, did knowingly and willfully receive any salary, and contribution to and supplementation of salary, as compensation for his services as an employee of NOAA/AOML, from a source other than the Government of the United States, that is, the People's Republic of China, Thousand Talents Program, in violation of Title 18, United States Code, Sections 209(a) and 216(a)(2).

A TRUE BILL

FOREPERSON _____


BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY


MICHAEL WALLEISA
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CHUNZAI WANG,

CERTIFICATE OF TRIAL ATTORNEY*

Defendant. /

Superseding Case Information:

Court Division: (Select One)

Miami X Key West _____
FTL _____ WPB _____ FTP _____

New Defendant(s) _____ Yes _____ No
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
List language and/or dialect _____

4. This case will take 8 days for the parties to try.

5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I 0 to 5 days _____
II 6 to 10 days _____
III 11 to 20 days _____
IV 21 to 60 days _____
V 61 days and over _____

Petty _____
Minor _____
Misdem. _____
Felony X

6. Has this case been previously filed in this District Court? No (Yes or No)

If yes:

Judge: _____

Case No. _____

(Attach copy of dispositive order) _____

Has a complaint been filed in this matter? No

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? No (Yes or No)

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes _____ X No



MICHAEL G. WALLEISA,
ASSISTANT U.S. ATTORNEY
Florida Bar No. 539570

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name CHUNZAI WANG

Case No: _____

Counts: 1-5

False, Fictitious, or Fraudulent Claims

Title 18, United States Code, Section 287(a)

*** Max. Penalty:** 5 Years' Imprisonment

Counts: 6-8

Illegal Supplementation of Government Salary

Title 18, United States Code, Sections 209(a) and 216(a)(2)

***Max. Penalty:** 5 Years' Imprisonment

Count: _____

***Max. Penalty:** _____

Count: _____

***Max. Penalty:** _____

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.