

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
2013 FEB 12 P 1:12
SIGNATURE: MARIA ELENA JAMES
CLERK OF DISTRICT COURT
SAN FRANCISCO, CALIFORNIA

UNITED STATES OF AMERICA,

V.

RS

CR 13 084

TAILIANG LI

DEFENDANT(S).

INDICTMENT

31 U.S.C. § 5324(a)(3)- Structuring Transactions To Evade
Reporting Requirements

31 U.S.C. § 5317(c) - Forfeiture

A true bill.

Rose Maher

Foreman

Filed in open court this 12 day of

Feb 2013

ROSE MAHER

MJ 2-13-13 Clerk

Maria Elena James
United States Chief Magistrate Judge

Bail, \$

NO BAIL ARREST WARRANT

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**31 U.S.C. § 5324(a)(3)- Structuring
Transactions To Evade Reporting
Requirements

31 U.S.C. § 5317(c) - Forfeiture

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony**PENALTY:**31 U.S.C. § 5324(a)(3) - 5 years prison, \$250,000 fine, 3
years supervised release, \$100 assessment;
31 U.S.C. § 5317(c) - Forfeiture**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

☐ person is awaiting trial in another Federal or State
Court, give name of court☐ this person/proceeding is transferred from another
district per (circle one) FRCrP 20, 21 or 40. Show
District☐ this is a reprosecution of
charges previously dismissed
which were dismissed on
motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding
this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.Name and Office of Person
Furnishing Information on THIS FORM
MELINDA HAAG☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned) THOMAS MOORE, AUSA, Chief Tax.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

TAILIANG LI

DISTRICT COURT NUMBER

084

RS

DEFENDANT**IS NOT IN CUSTODY**1) ☒ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons
was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other
charges☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer
been filed? ☐ Yes ☒ NoIf "Yes"
give date
filedDATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED
TO U.S. CUSTODY☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS*☒ WARRANT Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

*Where defendant previously apprehended on complaint, no new summons
or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

MELINDA HAAG (CABN 132612)
United States Attorney

FILED
2013 FEB 12 P 1:12
RECEIVED IN CHIEF
CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RS

UNITED STATES OF AMERICA,

No. CR-

CR 13 084

Plaintiff,

v.

TAILIANG LI,

Defendant.

VIOLATIONS: 31 U.S.C. § 5324 (a)(3) -
Structuring Transactions to Evade Reporting
Requirements

Forfeiture: 31 U.S.C. §§ 5317(c)

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH TWENTY:

(31 U.S.C. § 5324 (a)(3) Structuring Transactions to Evade Reporting Requirements)

Beginning on or about February 14, 2008, and continuing up to and including May
1, 2009, in the District of Northern California, the defendant,

TAILIANG LI,

a resident of San Francisco, California, did knowingly structure money transactions with
a domestic financial institution for the purpose of evading the identification and record-
keeping requirements imposed by Title 31, Code of Federal Regulations, Part
1020.410(a), by dividing a cash transaction involving more than \$3,000 into separate
purchases of money orders of less than \$3,000 each, and negotiating such money orders

with the purpose and intent of keeping each transaction under \$3,000 and did so as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

COUNT	MONEY ORDER PURCHASE DATE	MONEY ORDER PURCHASE AMOUNT
1	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
	2/14/2008	\$1,000.00
2	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/19/2008	\$1,000.00
	2/21/2008	\$1,000.00
	2/21/2008	\$1,000.00
3	3/13/2008	\$1,000.00

1		3/13/2008	\$1,000.00
2		3/13/2008	\$1,000.00
3		3/13/2008	\$1,000.00
4		3/13/2008	\$1,000.00
5		3/13/2008	\$1,000.00
6		3/13/2008	\$1,000.00
7		3/13/2008	\$1,000.00
8		3/13/2008	\$1,000.00
9		3/13/2008	\$1,000.00
10		3/13/2008	\$1,000.00
11	4	3/17/2008	\$1,000.00
12		3/17/2008	\$1,000.00
13		3/17/2008	\$1,000.00
14		3/17/2008	\$1,000.00
15		3/17/2008	\$1,000.00
16		3/17/2008	\$1,000.00
17	5	3/19/2008	\$1,000.00
18		3/19/2008	\$1,000.00
19		3/20/2008	\$1,000.00
20		3/20/2008	\$1,000.00
21	6	3/31/2008	\$1,000.00
22		3/31/2008	\$1,000.00
23		3/31/2008	\$1,000.00
24		3/31/2008	\$1,000.00
25	7	4/18/2008	\$1,000.00
26		4/18/2008	\$1,000.00
27		4/18/2008	\$1,000.00
28		4/18/2008	\$1,000.00

1		4/19/2008	\$1,000.00
2		4/19/2008	\$1,000.00
3	8	4/23/2008	\$1,000.00
4		4/23/2008	\$1,000.00
5		4/23/2008	\$1,000.00
6		4/23/2008	\$1,000.00
7	9	4/24/2008	\$1,000.00
8		4/24/2008	\$1,000.00
9		4/24/2008	\$1,000.00
10		4/24/2008	\$1,000.00
11	10	5/19/2008	\$1,000.00
12		5/19/2008	\$1,000.00
13		5/19/2008	\$1,000.00
14		5/19/2008	\$1,000.00
15	11	5/23/2008	\$1,000.00
16		5/23/2008	\$1,000.00
17		5/23/2008	\$1,000.00
18		5/23/2008	\$1,000.00
19	12	5/24/2008	\$1,000.00
20		5/24/2008	\$1,000.00
21		5/24/2008	\$1,000.00
22		5/24/2008	\$1,000.00
23		5/24/2008	\$1,000.00
24		5/24/2008	\$1,000.00
25		5/24/2008	\$1,000.00
26		5/24/2008	\$1,000.00
27		5/24/2008	\$1,000.00
28		5/24/2008	\$1,000.00

1		5/24/2008	\$1,000.00
2		5/24/2008	\$1,000.00
3		5/24/2008	\$1,000.00
4		5/24/2008	\$1,000.00
5		5/24/2008	\$1,000.00
6		5/24/2008	\$1,000.00
7	13	5/27/2008	\$1,000.00
8		5/27/2008	\$1,000.00
9		5/28/2008	\$1,000.00
10		5/28/2008	\$1,000.00
11		5/28/2008	\$1,000.00
12		5/28/2008	\$1,000.00
13		5/28/2008	\$1,000.00
14		5/28/2008	\$1,000.00
15		5/28/2008	\$1,000.00
16		5/28/2008	\$1,000.00
17		5/28/2008	\$1,000.00
18		5/28/2008	\$1,000.00
19		5/28/2008	\$1,000.00
20		5/28/2008	\$1,000.00
21		5/31/2008	\$1,000.00
22		5/31/2008	\$1,000.00
23	14	6/02/2008	\$1,000.00
24		6/02/2008	\$1,000.00
25		6/02/2008	\$1,000.00
26		6/02/2008	\$1,000.00
27		6/03/2008	\$1,000.00
28		6/03/2008	\$1,000.00

1		6/03/2008	\$1,000.00
2		6/03/2008	\$1,000.00
3		6/03/2008	\$1,000.00
4		6/03/2008	\$1,000.00
5		6/03/2008	\$1,000.00
6		6/03/2008	\$1,000.00
7		6/10/2008	\$1,000.00
8		6/10/2008	\$1,000.00
9	15	6/16/2008	\$1,000.00
10		6/16/2008	\$1,000.00
11		6/16/2008	\$1,000.00
12		6/16/2008	\$1,000.00
13		6/20/2008	\$1,000.00
14		6/20/2008	\$1,000.00
15		6/20/2008	\$1,000.00
16		6/20/2008	\$1,000.00
17	16	6/28/2008	\$1,000.00
18		6/28/2008	\$1,000.00
19		7/01/2008	\$1,000.00
20		7/01/2008	\$1,000.00
21		7/01/2008	\$1,000.00
22		7/01/2008	\$1,000.00
23		7/01/2008	\$1,000.00
24		7/01/2008	\$1,000.00
25		7/01/2008	\$1,000.00
26		7/01/2008	\$1,000.00
27		7/01/2008	\$1,000.00
28		7/01/2008	\$1,000.00

1		7/01/2008	\$1,000.00
2		7/01/2008	\$1,000.00
3	17	7/05/2008	\$1,000.00
4		7/05/2008	\$1,000.00
5		7/05/2008	\$1,000.00
6		7/05/2008	\$1,000.00
7		7/05/2008	\$1,000.00
8		7/05/2008	\$1,000.00
9		7/05/2008	\$1,000.00
10		7/05/2008	\$1,000.00
11		7/05/2008	\$1,000.00
12		7/05/2008	\$1,000.00
13		7/05/2008	\$1,000.00
14		7/05/2008	\$1,000.00
15	18	2/03/2009	\$1,000.00
16		2/03/2009	\$1,000.00
17		2/04/2009	\$1,000.00
18		2/04/2009	\$1,000.00
19	19	4/15/2009	\$1,000.00
20		4/15/2009	\$1,000.00
21		4/16/2009	\$1,000.00
22		4/16/2009	\$1,000.00
23		4/16/2009	\$1,000.00
24		4/16/2009	\$1,000.00
25		4/16/2009	\$1,000.00
26		4/16/2009	\$1,000.00
27		4/17/2009	\$1,000.00
28		4/17/2009	\$1,000.00

	4/17/2009	\$1,000.00
	4/17/2009	\$1,000.00
20	4/27/2009	\$1,000.00
	4/27/2009	\$1,000.00
	5/01/2009	\$1,000.00
	5/01/2009	\$1,000.00
	Total	\$174,000.00

All in violation of Title 31, United States Code, Section 5324(a)(3).

FORFEITURE

THE GRAND JURY FURTHER FINDS THAT:

The allegations contained in Counts One through Thirty-Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 31, United States Code, Section 5317.

Pursuant to Title 31, United States Code, Section 5317, upon conviction of an offense in violation of Title 31, United States Code, Section 5324, the defendant, TAILIANG LI, shall forfeit to the United States of America all property, real or personal, involved in the offenses and any property traceable to such property. The property to be forfeited includes, but is not limited to, \$174,000.

If any of the property described above, as a result of any act or omission of the defendant:

- 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant

1 to Title 21, United States Code, Section 853(p), as incorporated by Title 31, United States
2 Code, Section 5317(c) Title 28, United States Code, Section 2461(c).

3
4 Dated: 2-12-13

A True Bill

Adam Marshall
FOREPERSON

5
6 MELINDA HAAG
United States Attorney

7 Douglas W. Horn for
8 MIRANDA KANE
9 Assistant United States Attorney
Chief, Criminal Division

10
11 Approved as to Form

12 T. Moore
13 THOMAS MOORE
14 Assistant United States Attorney
Chief, Tax Division