UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	**Criminal No.:** 20-87 (TSC)
	:	
v.	:	**Magistrate No.:** **19-mj-277**
	:	
	:	
JUN WEI YEO, also known as	:	
DICKSON YEO,	:	
	:	
Defendant.	:	

STATEMENT OF OFFENSE

Pursuant to the Federal Rules of Criminal Procedure 11, the United States and Defendant Jun Wei Yeo ("Yeo") stipulate and agree that the following facts are true and accurate. These facts do not constitute all facts known to the parties concerning the charged offense and covered conduct. This statement is being submitted by the parties to demonstrate that sufficient facts exist to establish that the defendant committed the offense to which he is pleading guilty.

Statement of Facts

The government's evidence includes, but is not limited to, the following:

Defendant Yeo worked under the direction and control of People's Republic of China (PRC) Chinese intelligence service (PRCIS) operatives over the past four to five years, endeavoring to obtain valuable non-public information from the United States. Using the internet and various social media sites, Yeo worked to spot and assess Americans with access to valuable non-public information, including U.S. military and government employees with high-level security clearances. Yeo recruited these individuals and paid them to write reports. Yeo told the individuals that the reports were intended for clients in Asia, without revealing that the reports were being sent to the PRC government.

Yeo is a Singaporean national. Yeo's work with PRCIS operatives began as early as 2015 when Yeo traveled to Beijing, China, and gave a presentation on the political situation in Southeast Asia. At the time, Yeo was studying to receive his Doctorate of Philosophy in Public Policy from the National University of Singapore. After his presentation, Yeo was recruited by various individuals who claimed to represent PRC-based think tanks. These individuals offered Yeo money in exchange for political reports and information. Yeo came to understand that at least four of these individuals were intelligence operatives for the PRC government. One of the intelligence operatives later asked Yeo to sign a contract with the PRC People's Liberation Army (PLA). Yeo refused to sign the contract but continued to work for this and other PRCIS operatives.

The PRCIS operatives tasked Yeo with providing them information about international political, economic, and diplomatic relations. They instructed Yeo that they wanted non-public information, information that they referred to as "scuttlebutt." At first, the taskings were focused on Southeast Asia. Over time, the taskings became focused on the United States.

Although these PRCIS operatives used pseudonyms in their interactions with Yeo, they were open about their affiliation with the PRC government. One of the operatives told Yeo that he and his boss worked for the PRC's main intelligence unit. During one of Yeo's trips to China, Yeo met in a private hotel room with this operative and two other individuals. During this meeting, the operative tasked Yeo with obtaining non-public information about the U.S. Department of Commerce, artificial intelligence, and the "trade war" between China and the United States.

Yeo met with PRCIS operatives in various locations across China. Yeo met with one of his PRCIS contacts approximately 19 to 20 times. He met with another PRCIS operative approximately 25 times. When Yeo traveled to China for these meetings, he was regularly taken out of the customs line and brought to a separate office for admission into the country. Yeo raised

this issue with one of the PRCIS operatives, who responded by telling Yeo that they wanted to conceal his identity when he traveled into China.

On more than one occasion, Yeo received the exact same tasking from all of his PRCIS contacts, leading Yeo to surmise that there is one central authority in Beijing that disseminates research questions to various components of the PRCIS.

To fulfill his taskings, Yeo used the internet and social media to find and recruit United States citizens who could provide him information. In or around 2018, a PRCIS intelligence operative instructed Yeo to create a fake consulting company and post job listings for the company on an online job-search website. Yeo did as instructed. For his fake consulting company, Yeo used the same name as a prominent U.S. consulting firm that conducts public and government relations. Yeo later informed U.S. law enforcement that, in response to the fake job posting, Yeo received over 400 resumes. According to Yeo, 90% of the resumes he received were from U.S. military and government personnel with security clearances. Yeo would pass resumes to one of the PRCIS operatives when Yeo believed the operative would find them interesting.

Yeo also used a professional networking website that is focused on career and employment information. Yeo used the professional networking website to find individuals with resumes and job descriptions that suggested they were likely to have access to valuable non-public information. After Yeo contacted potential targets online, the professional networking website began to suggest additional potential contacts. According to Yeo, the website's algorithm was relentless. Yeo checked the professional networking website almost every day to review the new batch of potential contacts suggested to him by the site's algorithm. Later, Yeo told U.S. law enforcement that it felt almost like an addiction.

After Yeo identified potential targets online, he worked to recruit them to provide information and write reports. Yeo received guidance from his PRCIS contacts for how to recruit potential targets, including asking whether the targets were dissatisfied with work, were having financial troubles, had children to support, and whether they had a good rapport with Yeo.

Yeo successfully recruited multiple U.S. citizens to provide him with information:

For example, in or around 2015, Yeo spotted and contacted U.S. Person 1 using the professional networking website mentioned above. U.S. Person 1 was a civilian working with the United States Air Force on the F-35B military aircraft program. (Law enforcement has determined that U.S. Person 1 has a high-level security clearance). U.S. Person 1 confided to Yeo that he was having financial troubles. Yeo successfully recruited U.S. Person 1 to write a report for him. In addition, U.S. Person 1 provided Yeo information about the geopolitical implications of the Japanese purchasing the F-35 aircraft from the United States. Yeo then drafted a report on that information and sent it to one or more of his PRCIS contacts.

U.S. Person 2 sent his resume to Yeo in response to the job posting for Yeo's fake consulting company. Yeo then contacted U.S. Person 2 via a social networking app. U.S. Person 2 was an officer in the United States Army who was assigned to the Pentagon at the time. Later, Yeo met with U.S. Person 2 in the United States on multiple occasions and was able to build a good rapport with him. U.S. Person 2 confided to Yeo that he was traumatized by his military tours in Afghanistan. Yeo asked U.S. Person 2 to write reports for clients in Korea and other Asian countries. Yeo did not disclose to U.S. Person 2 that the reports would be given to a foreign government. At Yeo's direction, U.S. Person 2 wrote a report on how the withdrawal of U.S. military forces from Afghanistan would impact China. Yeo paid $2,000 or more for the report.

Yeo made this payment by transferring funds to U.S. Person 2's wife's bank account, rather than sending the money to U.S. Person 2 directly.

At some point, one of the PRCIS operatives told Yeo to recruit U.S. Person 2 to provide classified information. The operative said he would pay Yeo more money if Yeo could turn U.S. Person 2 into a permanent conduit of information. Yeo returned to the United States in November 2019 planning to ask U.S. Person 2 to provide classified information. Yeo also planned to reveal to U.S. Person 2 that Yeo was working for the PRC government. However, when Yeo landed at the airport, Yeo was stopped by law enforcement, questioned, and eventually arrested. Yeo was arrested before he could ask U.S. Person 2 to provide classified information.

Between 2018 and 2019, Yeo spotted U.S. Person 3 on the professional networking website mentioned above. U.S. Person 3 was employed at the U.S. Department of State at the time. U.S. Person 3 confided to Yeo that he was feeling dissatisfied at work and was having financial troubles. At Yeo's direction, U.S. Person 3 wrote a report about a then-serving member of the U.S. cabinet. U.S. Person 3 told Yeo that he was worried about his upcoming retirement. U.S. Person 3 feared that if officials at the Department of State discovered that he provided information to Yeo, it would jeopardize his retirement pension. Yeo paid him $1,000 or $2,000 for the report.

Yeo traveled to the United States to continue his efforts, under the direction and control of PRCIS operatives. Yeo lived in the Washington, D.C. area from approximately January 2019 to July 2019. Yeo used his time in Washington, D.C., to network and to spot and assess individuals to write papers. Yeo attended multiple events and speaking engagements at D.C.-area think tanks. While networking in the United States, Yeo made contact with several individuals from lobbying firms and defense contracting companies.

The PRCIS operatives directed Yeo not to communicate with them when Yeo traveled to the United States for fear that the U.S. government would intercept their communications. One of the PRCIS operatives instructed Yeo that, if Yeo must email them from the United States, he should do so from a local coffee shop. A different PRCIS operative directed Yeo not to take his phone and notebooks when traveling to the United States. This same operative gave Yeo a bank card so that Yeo could pay his American contacts for the information they provided. When Yeo was outside the United States, this PRCIS operative communicated with Yeo through the encrypted Chinese messaging application WeChat. Yeo was instructed to use multiple phones and to change his WeChat account every time he contacted the PRCIS operatives.

Yeo failed to notify the U.S. Attorney General that he would be acting in the United States as an agent of a foreign government or foreign government official, as required by 18 U.S.C. § 951.

Yeo has admitted that he accepted, conducted, and followed through on taskings for PRCIS operatives with a full appreciation of what he was doing.

DEFENDANT'S ACKNOWLEDGMENT

The preceding statement is a summary made for the purpose of providing the Court with a factual basis for my guilty plea to the charge against me. I make this statement knowingly and voluntarily, and I stipulate and agree that this Statement of Offense concerning my actions is true and accurate. I have read every page of this Statement of Offense and have discussed it with my attorney Michelle Peterson, Esq. I am fully satisfied with the legal services provided to me in connection with this plea. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of Offense fully.
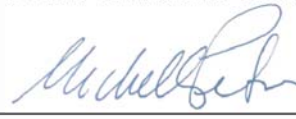
Date: __15th July 2020__

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Jun Wei Yeo, a/k/a Dickson Yeo
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of Offense and have reviewed it with my client fully. I concur in my client's desire to adopt and stipulate to this Statement of Offense as true and accurate.

Date: __7/20/2020__

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Michelle Peterson, Esq.
Attorney for Defendant