UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - - - - x

UNITED STATES OF AMERICA   :

          - v. -   :   **INDICTMENT**

                                   :

CHENG LE,   :   15 Cr.
    a/k/a "William Lee,"   :
    a/k/a "Daniel Chunn,"   :
    a/k/a "Steven Phanatasio,"   :
                                   :
                    Defendant.   :

- - - - - - - - - - - - - - - - - - x

COUNT ONE

(Attempted Acquisition of a Biological Toxin)

The Grand Jury charges:

1.   From at least in or about December 3, 2014, up to and
including on or about December 23, 2014, in the Southern District
of New York and elsewhere, CHENG LE, a/k/a "William Lee," a/k/a
"Daniel Chunn," a/k/a "Steven Phanatasio," the defendant, and others
known and unknown, knowingly did attempt to develop, produce,
stockpile, transfer, acquire, retain, and possess a biological
toxin, to wit, ricin, for use as a weapon.

(Title 18, United States Code, Sections 175(a) & 2.)

COUNT TWO

(Use of False Name in Furtherance of Unlawful Business)

The Grand Jury further charges:

2.   On or about December 23, 2014, in the Southern
District of New York and elsewhere, CHENG LE, a/k/a "William Lee,"

a/k/a "Daniel Chunn," a/k/a "Steven Phanatasio," the defendant, knowingly, for the purpose of conducting, promoting, and carrying on by means of the Postal Service, any scheme and device mentioned in Title 18, United States Code, Section 1341 and any other unlawful business, took and received from an authorized depository of mail matter a letter, postal card, package, and other mail matter addressed to a name other than his own proper name, to wit, CHENG accepted a package addressed to "Daniel Chunn," for the purpose of conducting, promoting, and carrying on by means of the Postal Service the unlawful activity set forth in Count One of this Indictment.

(Title 18, United States Code, Section 1342.)

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FOREPERSON

Preet Bharara
PREET BHARARA
United States Attorney

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Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CHENG LE,
a/k/a "William Lee,"
a/k/a "Daniel Chunn,"
a/k/a "Steven Phanatasio,"
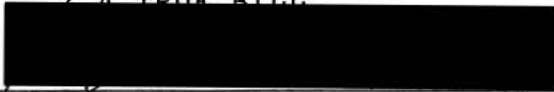
Defendant.

SEALED INDICTMENT

15 Cr.

(18 U.S.C. §§ 175(a), 1342, 2)

PREET BHARARA
United States Attorney.

A TRUE BILL.

Foreperson