

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|--------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | No. 14 CR 424 |
| |) | |
| JINHUANG ZHENG, |) | |
| aka "Benny," |) | |
| SHENG QUAN DONG, |) | Violation: Title 18, United |
| aka "Peter," |) | States Code, Section 894(a)(1) |
| BING LIANG CHEN, |) | |
| aka "Michael," |) | |
| DANIEL ZHU, |) | |
| MINGRUI SUN, and |) | |
| JACK WU |) | |

COUNT ONE

The SPECIAL FEBRUARY 2014 GRAND JURY charges:

1. At times material to this indictment:
 - a. Company A, which was located in Indianapolis, Indiana, was a supplier of restaurant goods and extended lines of credit to its customers, which allowed customers to obtain goods immediately and pay at a later time.
 - b. Defendant JINHUANG ZHENG was an owner and employee of Company A.
 - c. Prior to June 1, 2014, Victim A was an employee of Restaurant A, which had locations in Naperville and Lombard, Illinois. Restaurant A owed a debt to Company A for approximately \$40,000 worth of goods supplied by Company A pursuant to a line of credit for which payment had not been made.

d. By at least on or about June 1, 2014, Victim A was an employee of Restaurant B in Aurora, Illinois, and was not affiliated with Restaurant A.

2. Beginning no later than in or about May 2014, and continuing until at least in or about the end of July 2014, at Chicago and Aurora, in the Northern District of Illinois, Eastern Division, and elsewhere,

JINHUANG ZHENG,
aka "Benny,"
SHENG QUAN DONG,
aka "Peter,"
BING LIANG CHEN,
aka "Michael,"
DANIEL ZHU,
MINGRUI SUN, and
JACK WU,

defendants herein, did conspire to knowingly participate in the use of extortionate means, as that term is defined in Title 18, United States Code, Section 891(7), namely, the use, and the express and implicit threat of use, of violence and other criminal means to cause harm to the person of Victim A and to the property of Restaurant B, to collect and attempt to collect an extension of credit, as defined in Title 18, United States Code, Section 891(1), from Victim A, in violation of Title 18 United States Code, Section 894(a)(1).

3. It was part of the conspiracy that, in or about May 2014, defendant JINHUANG ZHENG informed defendant SHENG QUAN DONG of the debt owed by Restaurant A to Company A. In doing so, defendant JINHUANG ZHENG showed defendant SHENG QUAN DONG paperwork relating to such debt.

4. It was further part of the conspiracy that, in or about May and early June 2014, defendants JINHUANG ZHENG and SHENG QUAN DONG recruited defendants BING LIANG CHEN, DANIEL ZHU, and MINGRUI SUN to help collect from Victim A the debt Restaurant A owed to Company A.

5. It was further part of the conspiracy that, on or about June 1, 2014, defendants JINHUANG ZHENG, SHENG QUAN DONG, BING LIANG CHEN, DANIEL ZHU, and MINGRUI SUN met in Chicago's Chinatown neighborhood to discuss the debt Restaurant A owed to Company A. During this meeting, the defendants agreed to work together to obtain money from Victim A, through the use of violence and threats of violence, to repay the debt Restaurant A owed to Company A.

6. It was further part of the conspiracy that, on or about June 1, 2014, defendants JINHUANG ZHENG and SHENG QUAN DONG provided defendants BING LIANG CHEN, DANIEL ZHU, and MINGRUI SUN with paperwork relating to the debt Restaurant A owed to Company A.

7. It was further part of the conspiracy that, defendants BING LIANG CHEN, DANIEL ZHU, and MINGRUI SUN agreed to help collect from Victim A the debt Restaurant A owed to Company A.

8. It was further part of the conspiracy that, on or about June 1, 2014, defendants JINHUANG ZHENG, SHENG QUAN DONG, BING LIANG CHEN, DANIEL ZHU, and MINGRUI SUN traveled to Restaurant B in Aurora, Illinois, to

confront and to coerce and intimidate Victim A, through the use of violence and threats of violence, into paying the debt owed by Restaurant A to Company A.

9. It was further part of the conspiracy that, on or about June 1, 2014, while inside Restaurant B, defendant JINHUANG ZHENG demanded that Victim A pay the debt owed to Company A.

10. It was further part of the conspiracy that, on or about June 1, 2014, when Victim A refused to pay the debt owed by Restaurant A to Company A, defendants JINHUANG ZHENG, SHENG QUAN DONG, BING LIANG CHEN, DANIEL ZHU, and MINGRUI SUN attacked and physically assaulted Victim A outside Restaurant B, including by simultaneously punching and kicking Victim A in the head and body after Victim A was knocked to the ground. During the attack, one of the defendants told Victim A, in essence, that if he did not pay, he was going to die.

11. It was further part of the conspiracy that, in or about June 2014, after Victim A had refused to pay the debt owed by Restaurant A to Company A, defendant BING LIANG CHEN recruited defendant JACK WU to return to Restaurant B with defendant BING LIANG CHEN to confront Victim A and to intimidate Victim A through threats of violence into paying the debt.

12. It was further part of the conspiracy that defendant BING LIANG CHEN showed defendant JACK WU paperwork relating to the debt Restaurant A owed to Company A.

13. It was further part of the conspiracy that defendants BING LIANG CHEN and JACK WU agreed that defendant JACK WU would be paid approximately \$2,000 for helping defendant BING LIANG CHEN collect the debt from Victim A.

14. It was further part of the conspiracy that, in or about June and July 2014, defendants BING LIANG CHEN and JACK WU drove to Aurora on approximately three occasions to locate and attempt to confront Victim A about the debt Restaurant A owed to Company A.

15. It was further part of the conspiracy that, in or about June and July 2014, defendants BING LIANG CHEN and JACK WU entered Restaurant B in an attempt to locate Victim A and to intimidate Victim A through threats of violence into paying the debt.

16. It was further part of the conspiracy that, on or about July 9, 2014, defendants BING LIANG CHEN and JACK WU entered Restaurant B and requested Victim A's telephone number from Employee A, who was working inside Restaurant B.

17. It was further part of the conspiracy that, on or about July 9, 2014, when Employee A did not provide the telephone number for Victim A, defendant BING LIANG CHEN made a threat to break Restaurant B's windows.

18. It was further part of the conspiracy that, on or about July 9, 2014, defendants BING LIANG CHEN and JACK WU conducted surveillance of

Employee A, who they selected because they believed Employee A was related to Victim A. In doing so, for the purpose of attempting to locate Victim A's residence, defendants BING LIANG CHEN and JACK WU followed Employee A to Employee A's residence.

19. It was further part of the conspiracy that, on or about July 9, 2014, defendant BING LIANG CHEN stored Employee A's license plate and street address information in a cellular telephone used by defendant BING LIANG CHEN.

20. It was further part of the conspiracy that defendants BING LIANG CHEN and JACK WU planned to return to Victim A's residence to intimidate Victim A through threats of violence into paying the debt.

21. It was further part of the conspiracy that defendants JINHUANG ZHENG, SHENG QUAN DONG, BING LIANG CHEN, DANIEL ZHU, MINGRUI SUN, and JACK WU concealed and hid and caused to be concealed and hidden the purposes and the acts done in furtherance of the conspiracy to avoid detection and apprehension by law enforcement authorities.

All in violation of Title 18, United States Code, Section 894(a)(1).

COUNT TWO

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On or about June 1, 2014, at Chicago and Aurora, in the Northern

District of Illinois, Eastern Division, and elsewhere,

JINHUANG ZHENG,
aka "Benny,"
SHENG QUAN DONG,
aka "Peter,"
BING LIANG CHEN,
aka "Michael,"
DANIEL ZHU, and
MINGRUI SUN,

defendant herein, knowingly participated in the use of extortionate means, as that term is defined in Title 18, United States Code, Section 891(7), namely, the use, and the express and implicit threat of the use, of violence and other criminal means to cause harm to the person of Victim A to collect and attempt to collect an extension of credit, as defined in Title 18, United States Code, Section 891(1), from Victim A;

In violation of Title 18 United States Code, Section 894(a)(1).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY