



**ATTACHMENT A**

Between in and around October 2010 through in and around October 2013, in the District of New Jersey and elsewhere, defendant

**SARA RONG LIU**

did knowingly and intentionally devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate commerce the following writing, sign, signal, picture, and sound, among others, a wire transfer, on or about March 25, 2013, of approximately \$20,000 from a Bank of America checking account belonging to "Victim Investor 1" located in Virginia to a Bank of America checking account belonging to SARA RONG LIU located in New Jersey.

In violation of Title 18, United States Code, Section 1343.

## ATTACHMENT B

I, Edgar W. Koby, Jr., have been a Special Agent of the Federal Bureau of Investigation ("FBI") for approximately fourteen years, and I have been personally involved in the investigation of this matter. The information contained in this Complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information relating to SARA RONG LIU, the defendant; (c) documents obtained from various sources; and (d) discussions with other law enforcement officials. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

At all times relevant to this Complaint:

1. SARA RONG LIU ("LIU") resided in Mahwah, New Jersey, and was the president of Westone, Inc. ("Westone"), a company headquartered in Hackensack, New Jersey, and purportedly involved in the wholesale distribution of textiles as well as interior design.

2. Between in and around October 2010 and in and around October 2013, LIU falsely represented to individuals (hereinafter the "victim investors"), among other things, that Westone had been awarded a lucrative \$156.6 million contract by the New York City Department of Design and Construction Fund ("NYC DDC").

3. In fact, the NYC DDC never awarded LIU or Westone any such contract.

4. Nevertheless, LIU created or caused to be created documents which stated, among other things, that the NYC DDC had awarded her a \$156.6 million contract to provide "Design, Construction, and Construction Support Services for the Design, Manufacture, and Supply of Good Quality Home & Office Interior Textile Products and Finishing" in and around the New York metropolitan area.

5. In and around 2011, LIU also falsely represented to the victim investors that there was a problem with Westone's contract with the NYC DDC, and the NYC DDC required Westone to pay certain fees before it would release contract payments to LIU and Westone.

6. Thereafter, to support her false claims, LIU created or caused to be created a number of fictitious contracts, e-mails, and documents, including documents purportedly from the NYC DDC, the Federal Reserve Bank of New York, the Treasury Department, the Federal Bureau of Investigation, and the U.S. Attorney's Office for the Southern District of New York, among others.

7. LIU emailed a number of these documents to the victim investors from whom she solicited funds, which she characterized as short-term loans from the victim investors to LIU, which would be repaid immediately upon the release of the first contract payment of \$52.2 million from the NYC DDC. All of those statements were false.

8. Based on, among other things, the false statements described above, between in and around October 2010 and in and around February 2012, LIU obtained approximately \$530,000 from Victim Investor 1, who was located in Virginia. Victim Investor 1 wired a substantial portion of the \$530,000 to accounts controlled by LIU in New Jersey.

9. In all, LIU personally obtained more than approximately \$10 million in illegitimate proceeds from Victim Investor 1 and other victim investors located both in the United States and the People's Republic of China ("PRC"), pursuant to the above-described scheme and artifice to defraud, as well as pursuant to another scheme and artifice to defraud in which LIU falsely represented to the victim investors that she stood to receive more than approximately \$17 million from a deceased uncle's estate in the PRC, but LIU required money from the victim investors to first pay taxes related to her deceased uncle's estate before she could receive the money, which LIU further falsely represented she would then share with the victim investors.