

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
 :  
 -v.- :  
 :  
 YONG WANG, :  
 :  
 Defendant. :  
 :  
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INDICTMENT  
  
11 Cr. \_\_\_\_

COUNT ONE

(Advertising of Child Pornography)

The Grand Jury charges:

BACKGROUND

1. From at least in or about 2007, up to and including in or about June 2011, YONG WANG, the defendant, managed and operated at least 18 websites containing child pornography, ("the Websites"). The Websites also contained adult pornography; but two of the Websites contained predominantly child pornography, and all of the Websites contained at least some child pornography. WANG sold "memberships" to the Websites to individuals who paid to view, post, and download graphic images of child pornography. The Websites were all in the Chinese language and advertised to Chinese-speaking individuals in China, the United States and elsewhere.

2. To access the child pornography on the Websites, an individual was required to (i) purchase a "V.I.P. membership," or (ii) acquire "points" either by making monetary payments or by

posting pornography, including child pornography, to the Websites. YONG WANG, the defendant, oversaw memberships for the Websites and collected payments either directly or indirectly through associates who established accounts at banks in China, at WANG's behest. As advertised on the Websites, payments could be made in a variety of ways, including by: credit card; wire of funds to accounts at the Industrial and Commercial Bank of China (ICBC); Western Union or money order; online payments through both U.S.-based and China-based Internet payment systems; or cash.

3. Members could then access the Websites' links to an extensive child pornography collection that included images and videos of children exposing their genitals, engaged in sexually explicit conduct with adults, and in sadistic or masochistic depictions involving bondage and violence. One of the Websites was called "Empire of the Young and Innocent Fragrances" (translated from Chinese). The Websites's links advertised and offered access to child pornography collected under descriptive titles, such as "Young Young Empire," "Young Girl Beauty Photos Military Region," "Young Boy Movie Zone," and "Exclusive Quality Young Girl Photos Set."

4. From at least in or about 2007, up to and including in or about June 2011, YONG WANG, the defendant, made approximately

\$20,000 per month from membership dues for the Websites, totaling hundreds of thousands of dollars.

Statutory Allegations

5. From at least in or about 2007, up to and including in or about June 2011, in the Southern District of New York and elsewhere, YONG WANG, the defendant, knowingly and willfully made, printed, and published and caused to be made, printed, and published a notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute and reproduce a visual depiction the production of which involved the use of a minor engaging in sexually explicit conduct and which depiction was of such conduct, knowing or having reason to know that such notice and advertisement would be transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer and mailed, and such notice and advertisement was transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by a means including by computer and mailed, to wit, WANG maintained and operated websites that contained advertisements for the display and reproduction of images of child pornography over the Internet.

(Title 18, United States Code, Sections 2251(d)(1) and 2.)

COUNT TWO

(Receipt and Distribution of Child Pornography)

The Grand Jury further charges:

6. The allegations in paragraphs 1 through 4 are repeated and realleged as if fully set forth herein.

7. From at least in or about 2007, up to and including in or about June 2011, in the Southern District of New York and elsewhere, YONG WANG, the defendant, knowingly and willfully received and distributed material containing child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, WANG maintained and operated at least 18 websites that received and distributed images of child pornography over the Internet.

(Title 18, United States Code, Sections 2252A(a)(2)(B) and 2.)

COUNT THREE

(Reproduction of Child Pornography for Distribution)

The Grand Jury further charges:

8. The allegations in paragraphs 1 through 4 are repeated and realleged as if fully set forth herein.

9. From at least in or about 2007, up to and including in or about June 2011, in the Southern District of New York and elsewhere, YONG WANG, the defendant, knowingly and willfully

reproduced child pornography for distribution through the mails, and using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, to wit, WANG maintained and operated at least 18 websites that reproduced and distributed images of child pornography over the Internet.

(Title 18, United States Code, Sections 2252A(a)(3)(A) and 2.)

**FORFEITURE ALLEGATION**

10. As a result of committing one or more of the child pornography offenses alleged in Counts One, Two and Three of this Indictment, YONG WANG, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, all right, title and interest of the defendant in the following:

a. Any and all visual depictions as described in Title 18, United States Code, §§ 2251, 2251A, 2252 or 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Part I, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the said offenses, including, but not limited to, \$750,000, a sum of money representing the proceeds obtained from the said offenses;

c. Any property, real or personal, used or intended to

be used to commit or to promote the commission of the said offenses,  
and all property traceable to such property.

Substitute Assets Provision

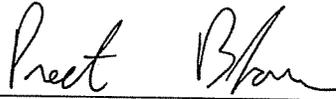
11. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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;

it is the intention of the United States, pursuant to 18 U.S.C. § 2253(b) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 2253, and Title 21, United States Code, Section 853(p).)



  
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PREET BHARARA *lx*  
United States Attorney

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

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SOUTHERN DISTRICT OF NEW YORK**

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**UNITED STATES OF AMERICA**

**- v. -**

**YONG WANG,**

**Defendant.**

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**INDICTMENT**

11 Cr.

18 U.S.C. §§ 2251, 2252A, & 2253 and 2.

**PREET BHARARA**  
United States Attorney.

**A TRUE BILL**

