
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : **Hon. Steven C. Mannion**
v. : **Magistrate No.: 16-6037 (SCM)**
ZITONG WEN, : **Criminal Complaint**
a/k/a "Kate Wen," and
CHAUN KIT YUEN,
a/k/a "Alvin Yuen"

I, David A. Ferrante, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



David A. Ferrante, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

March 30, 2016
Date

at

Newark, New Jersey
City and State

Honorable Steven C. Mannion
United States Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Visa Fraud)

From in or about September 2014 through in or about March 2016, in Union County, in the District of New Jersey, and elsewhere, defendants

**ZITONG WEN,
a/k/a "Kate Wen,"
and
CHAUN KIT YUEN,
a/k/a "Alvin Yuen"**

did knowingly and intentionally conspire and agree with each other and with others to commit an offense against the United States, that is, to utter, use, attempt to use, possess, obtain, accept, and receive non-immigrant visas, namely student visas and other documents proscribed by statute and regulation for entry into and as evidence of authorized stay in the United States, knowing that the student visas had been procured by means of false claims and statements and otherwise procured by fraud and unlawfully obtained, contrary to Title 18, United States Code, Section 1546(a).

In furtherance of the conspiracy and to effect its unlawful objects, the defendants committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere, as set forth in Attachment B below.

In violation of Title 18, United States Code, Section 371.

COUNT TWO
(Conspiracy to Harbor Aliens for Profit)

From in or about September 2014 through in or about March 2016, in Union County, in the District of New Jersey, and elsewhere, defendants

ZITONG WEN,
a/k/a "Kate Wen,"
and
CHAUN KIT YUEN,
a/k/a "Alvin Yuen"

did knowingly and intentionally conspire and agree with each other and with others, for the purpose of commercial advantage and private financial gain, to encourage and induce an alien to reside in the United States, knowing and in reckless disregard of the fact that such residence was and would be a violation of law, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iv).

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

ATTACHMENT B

I, David A. Ferrante, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"). I have personally participated in this investigation and am aware of the facts and circumstances contained herein based on my own investigation, as well as my review of documents, records, information and evidence provided to me by other law enforcement officers and relevant personnel. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint and arrest warrants, I have not necessarily included each and every fact known by the government concerning this investigation. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the day alleged.

The Defendants and Other Parties

1. At all times relevant to this Criminal Complaint:
 - a. Defendant ZITONG WEN a/k/a "Kate Wen" (hereafter "WEN") was a Chinese citizen residing in Rowland Heights, California. WEN was the founder and chief executive officer of Kats League Consulting, Inc. ("Kats League"), a purported international student consulting company located in California.
 - b. Defendant CHAUN KIT YUEN a/k/a "Alvin Yuen" (hereafter, "YUEN") was a Chinese citizen residing in Rowland Heights, California. YUEN was the executive director of operations for Kats League.
 - c. A federal agent was acting in an undercover capacity (hereinafter "UC-1").
 - d. A federal agent was acting in an undercover capacity (hereinafter "UC-2").
 - e. Federal agents were acting in an undercover capacity and posing as the owners and/or operators of the University of Northern New Jersey (hereinafter the "School"). The School was physically located in Cranford, New Jersey. The School was part of a federal law enforcement undercover operation designed to identify individuals and entities engaged in immigration fraud. The School was not staffed with instructors /educators, had no curriculum, and no actual classes or educational activities were conducted at the School.

f. A co-conspirator not named as a defendant herein was a foreign citizen who fraudulently maintained student visa status through WEN and YUEN (hereinafter "CC-1").

Overview of Investigation

2. Beginning in or about September 2013, federal agents from HSI, using the School, commenced an undercover operation to investigate criminal activities associated with the Student and Exchange Visitor Program ("SEVP"), including, but not limited to, student visa fraud and the harboring of aliens for profit. A brief summary of the SEVP is described in Paragraph 4, below.

3. During the course of the investigation, HSI agents identified numerous individuals and organizations that used the SEVP as an instrument to engage in criminal conduct. Specifically, as described more fully below, the investigation revealed that defendants WEN and YUEN enabled numerous foreign individuals to fraudulently maintain nonimmigrant status and obtain employment authorization to remain in the United States on the false pretense that these aliens were participating in full courses of study at an academic institution.¹ In truth and in fact, WEN and YUEN, with full knowledge that the aliens would not attend any actual courses, earn actual credits, or make academic progress toward an actual degree in a particular field of study, fraudulently maintained their recruits' student visa status in exchange for kickbacks, or "commissions." Additionally, WEN and YUEN facilitated the creation of false student records, including transcripts, for some of the foreign students for the purpose of deceiving immigration authorities.

Summary of Relevant Immigration Policies and Procedures

4. From my training and experience as a Special Agent with HSI, and from speaking with individuals and officials with knowledge of the SEVP with the Department of Homeland Security, I have learned about the requirements that foreign citizens must comply with under United States immigration law, including the following:

a. The United States requires individuals from most foreign countries to obtain a visa prior to entry into the United States. As they apply to this investigation, non-immigrant visas are required for foreign citizens who

1. Your Affiant is aware that this type of SEVP-related fraud is commonly referred to as a "pay to stay" scheme.

intend to enter the United States on a temporary basis, such as for tourism, medical treatment, business, temporary work, or study.²

b. A foreign citizen who wishes to enter and remain in the United States on a temporary basis to pursue a course of study at a college, university, seminary, conservatory, academic high school, or other academic institution, or for English language training (commonly referred to as "ESL"³), must first obtain an F-1 non-immigrant visa, also known as a student visa ("F-1 visa").

c. An F-1 visa is only valid for a temporary period, called the "duration of status," which status lasts as long as the foreign citizen is enrolled as a full-time student in an approved educational program and making normal progress toward completion of the course of study.⁴ Pursuant to 8 C.F.R. § 214.2(f)(6), a full course of study for a foreign citizen studying a language or other non-vocational training program under an F-1 visa (an "F-1 student") requires eighteen (18) clock hours of attendance per week, assuming the dominant portion of the course consists of classroom instruction. Significantly, when a foreign citizen stops pursuing a full course of study, the duration of status on his or her F-1 visa ends and the temporary period for which the individual was admitted to the United States expires.

2. Under 8 U.S.C. § 1101 (a)(15)(F)(i), an F-1 student (*i.e.*, a non-immigrant alien admitted to the United States on a temporary basis to pursue a course of study) is defined as follows: "an alien having a residence in a foreign country which he has no intention of abandoning, who is a bona fide student qualified to pursue a full course of study and who seeks to enter the United States temporarily and solely for the purpose of pursuing such a course of study consistent with section 1184(l) of this title at an established college, university, seminary, conservatory, academic high school, elementary school, or other academic institution or in an accredited language training program in the United States, particularly designated by him and approved by the Attorney General after consultation with the Secretary of Education. . . ."

3. One area of study available to F-1 students includes English language training, or ESL, courses. In order to pursue ESL studies, an F-1 student must enroll in an SEVP-certified English language training program. ESL students are not eligible for online or distance education, as all training must take place in a classroom (or computer lab) setting for a minimum of eighteen (18) hour per week. A foreign citizen who is granted an F-1 visa to participate in an ESL program may not obtain work authorization.

4. Certain F-1 students (identified as "Border Crossing" students from Mexico or Canada who attend a school within 75 miles of a land border) may be admitted to the United States until a date certain, rather than for duration of status. *See* 8 C.F.R. § 214.2(f)(18). None of the foreign individuals associated with this investigation were the recipient of a "Border Crossing" F-1 visa.

d. To obtain an F-1 visa, a foreign citizen must first apply to study at a school within the United States that has been certified by the SEVP to enroll and train foreign students. If accepted, the school will provide the foreign citizen with a "Certificate of Eligibility for Nonimmigrant (F-1) Student Status - For Academic and Language Students," also known as a Form I-20 A ("Form I-20"). The Form I-20 is required for the foreign citizen to obtain an F-1 visa. By issuing a Form I-20 to a foreign citizen, an SEVP-approved school certifies that the individual: (1) meets all standards of admission for the school based on a review of the student's application, transcripts, proof of financial responsibility, and other records; and (2) has been accepted for, and would be required to pursue, a full course of study.

e. Once a foreign citizen receives a Form I-20, that individual may apply for an F-1 visa. The foreign citizen can then use the F-1 visa and Form I-20 to enter and remain in the United States for the period of time he or she is granted. After a foreign citizen completes his or her course of study, that individual is typically required to depart the United States within 60 days. Conversely, if the foreign student fails to maintain status (*e.g.*, stops attending school, drops below the full course of study without authorization, etc.), the foreign student must depart the United States immediately.

f. The Student and Exchange Visitor Information System ("SEVIS") is an internet based data system that provides users with access to current information on nonimmigrant foreign citizens, exchange aliens, and their dependents. Each Form I-20 that is issued by a school to a foreign citizen will contain a system-generated identification number. This number is referred to as the "SEVIS ID number." Generally, the SEVIS ID number remains the same as long as the foreign citizen maintains his or her valid, original nonimmigrant status. This number will typically remain the same regardless of any changes or updates made by the school to the foreign citizen's record.

g. Once in the United States, a foreign citizen is generally permitted to transfer from one SEVP-certified school to another, as long as that individual maintains valid F-1 student status and is pursuing a full course of study. To effect such a transfer while maintaining valid status, a foreign citizen must first obtain a school acceptance letter and a SEVIS transfer form from the SEVP-certified school to which the student intends to transfer. The foreign citizen may then transfer to that school, obtain a Form I-20, and remain in the United States as long as he or she pursues a full course of study at the new SEVP-certified school.⁵

5. Every SEVP-approved school must have one Primary Designated School Official ("PDSO") who, among other things, certifies under penalty of perjury on the Form I-20 that the foreign student's application, transcripts, or other records of courses

h. In addition to taking a full course of study at an accredited institution, a non-ESL, F-1 student may also seek practical training - which could include paid employment - that is directly related to the student's major and is considered part of the student's program of study. The two types of practical training available to non-ESL, F-1 students include curricular practical training ("CPT") and optional practical training ("OPT"). If approved by the PDSO (or DSO), an F-1 student may obtain a new Form I-20 indicating that he or she has been approved for either CPT or OPT. Generally, therefore, as long as an F-1 student has been properly enrolled at an SEVP certified school, has taken classes and earned credits, and has made academic progress toward graduation,

taken, and proof of financial responsibility - including proof that the student has the funds necessary to live and study in the United States without working illegally or suffering from poverty - were received by the school and the student met the qualifications for admission. The PDSO also certifies that the foreign student will be required to pursue a full course of study as defined by the regulations in 8 C.F.R. § 214.2(f)(6). The forgoing certification responsibilities of the PDSO may also be handled by a Designated School Official ("DSO").

SEVP certified schools also are required to maintain up to date and accurate records in SEVIS regarding the foreign students attending the school and are required to input accurately when students have completed their studies so that their immigration status can be terminated. The PDSO (or DSO) is also required to maintain up to date and accurate records in the SEVIS database for status events of foreign students attending their school including, but not limited to: entry/exit data, changes of current United States address (residence), program extensions, employment notifications, changes in program of study, and completion of studies so the student's immigration status can be timely terminated.

Additionally, if a foreign citizen admitted on an F-1 visa to attend an SEVP-certified school has not pursued a full course of study at the school, a PDSO (or DSO) is prohibited from transferring that foreign citizen to another school. Pursuant to 8 C.F.R. § 214.2(8)(i), an F-1 student who was not pursuing a full course of study at the school he or she was last authorized to attend is ineligible for school transfer and must apply for reinstatement, or, in the alternative, may depart the U.S. and return as an initial entry in a new F-1 nonimmigrant status. Once an SEVP-certified school terminates an F-1 student's active status in SEVIS for "Unauthorized Drop Below Full Course of Study," thereby flagging the F-1 student's termination for review by the Department of Homeland Security, SEVP guidance allows the school to then transfer the F-1 student's SEVIS records *in terminated status* to another school. The terminated F-1 student must then file an application for reinstatement of active status with the support of the school the student is transferring to, or depart the United States. Further, an F-1 student who has not been pursuing a full course of study at an SEVP-certified school cannot be transferred to another school unless and until his or her active status has been terminated in SEVIS.

that F-1 student may have the opportunity to work full or part-time CPT or OPT, in addition to taking classes.⁶

The Defendants' Criminal Activities

5. Beginning in or about September 2014, WEN and YUEN contacted the School to offer their services as recruiting agents for purported foreign students. Over the course of the next several weeks, and in response to WEN and YUEN's inquiries, HSI undercover officers engaged in several consensually recorded telephone conversations, audio and video taped in-person meetings, e-mail correspondence, and text message communications with WEN and YUEN to negotiate the terms of their proffered recruiting services.

6. For example, on or about September 25, 2014, YUEN contacted the School by telephone and engaged in a consensually recorded conversation with UC-2. During this call, YUEN explained that he was affiliated with Kats League, a California-based recruiting agency that assisted international students with SEVP related matters, including efforts to obtain CPT work authorization. YUEN asked UC-2 whether the School could grant CPT authorization to undergraduate international transfer students. UC-2 replied that the School's enrollment was currently full, and that no classes were available. Despite that response, YUEN continued to negotiate with UC-1 and ultimately discussed a scenario whereby the School would accept "tuition" payments from Kats League's transfer students in exchange for full-time CPT authorization, without requiring the students to attend any actual classes or make any progress toward a legitimate course of study in an actual curriculum. YUEN also claimed that Kats League was looking to expand its recruiting network from the west coast to the east coast to satisfy a growing client base. As part of these discussions, UC-2 asked YUEN ". . . basically, do you have students that want to attend classes and learn something, or you have students that need to work?" YUEN

6. Practical training may be authorized to an F-1 student who has been lawfully enrolled on a full time basis, in a SEVP-certified institution, for one full academic year. CPT is more specifically defined as an alternative work/study, internship, cooperative education, or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreements with a given SEVP-certified institution. An F-1 student may be authorized by the PDSO (or DSO) to participate in a CPT program that is an integral part of an established curriculum. A student may begin CPT only after receiving his or her Form I-20 with the PDSO (or DSO) endorsement. A student may be authorized 12 months of practical training, and becomes eligible for another 12 months of practical training when he or she changes to a higher educational level. Exceptions to the one academic year requirement prior to obtaining CPT approval are provided for students enrolled in graduate studies that require immediate participation in curricular practical training. See 8 C.F.R. § 214.2 (10).

replied, "**basically all of them don't really want to attend class.**" (emphasis added). UC-2 further stated "okay so, if you just want CPT for, like a student just wants CPT, they can start anytime . . . **[s]o just gonna pay for the status to be able to work,** so they'll maintain their F-1 status, and then I can give them CPT." (Emphasis added). YUEN acknowledged the illicit nature of the proposed agreement, and then engaged in additional discussions regarding the price the School would charge each purported foreign student for the service, as well as a deduction on the proposed "tuition" rate based on the number of individuals recruited by Kats League for the School.

7. The following day, WEN and YUEN contacted UC-1 by telephone and engaged in several consensually recorded conversations. During these calls, WEN and YUEN further discussed the terms of the proposed recruiting arrangement that YUEN had previously negotiated with UC-2. As part of these conversations, WEN indicated that Kats League had a number of purported foreign students who were primarily interested in maintaining their immigration status and obtaining work authorization by purchasing Forms I-20 and CPT documentation. WEN further claimed that although there were a number of schools in Los Angeles that offered similar services, that WEN did not entirely trust their operations. To gauge a potential business partnership between Kats League and the School, WEN asked, "so, all the bachelor, masters and ESL, they don't have to attend school, is that correct?" UC-1 replied, "[t]hat's correct." WEN and YUEN also made numerous queries regarding the receipt of CPT authorization, including the length of time it would be authorized and the cost for obtaining said approval. During these discussions, the following conversation ensued, in part:

UC-1: You're really paying to maintain the status and then the CPT is just like an added benefit, but it's a big added benefit because, you know, people wanna work. You know, that's kind of the purpose of it.

YUEN: Alright. So, okay, we'll call you again if we get more questions.

UC-1: Okay?

YUEN: Thanks for your help.

UC-1: Sure, sure. And Alvin [*i.e.*, YUEN], you know that none of these people are going to class, this just, you know, between us, you know, you're good with that right? Make sure your clients are good with it too, okay? I don't want anybody, you know, showing up at my

doorstep thinking they're gonna be in my, you know, my advanced calculus class or anything like that. I don't . . . that's not gonna happen, right? **We know this is just to maintain status.** (emphasis added).

YUEN: No, no, no [laughing] . . . right.

UC-1: Okay, just making sure, just making sure.

YUEN: Yeah, yeah, oh yeah, **we've been doing this for years. No worries.** (emphasis added).

8. Based on the foregoing discussions, WEN and YUEN began to facilitate the enrollment of dozens of foreign students at the School, knowing that the individuals they referred were not bona fide students and had no intention of attending actual classes or earning real credits at the School.⁷ In exchange for receiving a Form I-20 from the School and being reported in SEVIS as a legitimate foreign student, WEN and YUEN's recruits made "tuition" payments to the School that corresponded to the length of time that the purported foreign students were enrolled. For each foreign student referred by Kats League and subsequently "enrolled" at the School (for both CPT and ESL programs), WEN and YUEN collected a percentage of the foreign student's tuition payments as commission for their recruiting services. Once an alien was referred to the School, WEN and YUEN routinely followed up with School personnel via telephone and e-mail to track the status of the issuance of relevant immigration documents, including Forms I-20 and CPT documentation, for their recruits. The Forms I-20 that WEN and YUEN caused the School to issue to Kats League recruits were falsely made and procured by fraud. WEN and YUEN knew the Forms I-20 were fraudulent because their recruits would not be attending any classes at the School and would not be making any academic progress toward a legitimate degree in an established curriculum; indeed, the Forms I-20 were procured by WEN and YUEN to fraudulently maintain their foreign recruits' immigration and work status in the United States.

9. During the course of their illicit dealings with the School, WEN and YUEN attempted to minimize their risk of potential exposure by immigration and law enforcement personnel. For example, on or about January 23, 2015, WEN and YUEN traveled to New Jersey and met with UC-1 at the School. During this consensually meeting (audio and video), WEN and YUEN discussed the School's operations concerning the number of international students enrolled there.

7. From in or about September 2014 through in or about March 2016, WEN and YUEN recruited and referred approximately 36 foreign individuals to the School, and collected thousands of dollars in commission fees as a result of their illicit activities.

WEN expressed her concern that the enrollment of too many international students would draw unnecessary attention to the School by the authorities. Further, WEN and YUEN advised UC-1 it was important for the School to conduct its operations with a "long term" view, rather than to maximize short term profit. WEN stated, "[w]e did a lot of work to select this kind of school 'cause we want to, is it safe, and we, we try to find a business who really knows about this business, and very mature about how to do it . . . [w]e know several ways to do it . . . [s]ome people they say is easy to run a school, to just file students . . . I want to work with some people . . . long term, not short term. . . . I know how, how to do short term but it's dangerous, and some people may get in jail." Moreover, WEN and YUEN attempted to persuade UC-1 from providing any exclusive recruiting contracts to other west coast recruiting agents. Also, WEN and YUEN informed UC-1 about the safety protocols they used when recruiting and referring international students. In one instance, WEN and YUEN explained the importance of advising purported foreign students not to unnecessarily travel outside the U.S. YUEN stated, "[w]ell the most important thing is they don't go through the border . . . we educate every student we got . . . because we have to be very careful . . . what they say." Finally, WEN and YUEN requested a tour of the School's facilities to make sure that it would appear legitimate if it was inspected by immigration and/or SEVP officials. In response, UC-1 explained that the School kept voluminous records designed to deceive authorities, and that UC-1 had paid various individuals in New Jersey in exchange for advance information of potential, unannounced inspections. Satisfied, WEN replied, "[y]ou said you have someone to cover you, right . . . oh, that's good . . . yeah . . . [t]hen they'll tell you before they come."

10. Additionally, WEN and YUEN advised UC-1 about illegal activities at other purported educational institutions that could have an impact on their ongoing illicit dealings with the School. Notably, on or about March 12, 2015, YUEN contacted UC-1 by telephone and engaged in a consensually recorded conversation. During this discussion, YUEN discussed a recent federal takedown of four "pay to stay" visa mills in Los Angeles, California, and expressed his concern whether the School might encounter similar criminal exposure as a result of the ongoing illegal transactions conducted by and between WEN, YUEN and the School.⁸ During this call, the following conversation ensued, in part:

8. On or about March 9, 2015, federal authorities arrested three Los Angeles, California area residents responsible for operating a network of four schools on charges of helping hundreds of foreign nationals remain in the United States as foreign students, even though they never attended classes. The three defendants allegedly ran a "pay-to-stay" scheme through the schools, identified as: (i) Prodee University/Neo-America Language School; (ii) Walter Jay M.D. Institute, an Educational Center (WJMD); (iii) the American College of Forensic Studies (ACFS); and (iv) Likie

YUEN: Um, you read the news, right?

UC-1: What news?

YUEN: Um, yesterday's news.

UC-1: Nothing specific, I was watching the news but is there something going on I need to know about?

YUEN: You gotta, look at the SEVIS, webpage . . . they closed down four schools.

UC-1: Okay, uh, okay, where? Where did they close the four schools?

YUEN: The, all of them are in Los Angeles.

UC-1: Okay, I mean, are you guys affected at all? I mean, did you guys get in trouble?

YUEN: We, we sent some students there, but we, we can handle it though, it's not, not a problem, but the thing is, actually, that's one of the most low key schools in Los Angeles so, so although the higher ones didn't get caught yet, but, they're gonna be in big trouble there.

UC-1: Yeah, yeah. ***So the people you sent there, were they like, school for real or were they like special arrangement, like we got?***

YUEN: Um, ***special arrangement.***

UC-1: Oh okay. ***So they weren't going to class or anything, right?***

YUEN: Um, they . . . ***yeah.*** (emphasis added).

UC-1: Yeah. Alright, well, I mean do you think you, I mean, how many did you send there? I mean, it's a lot? A little bit? A few? I mean, what kind of exposure are we looking at?

YUEN: Well, in total, they have fifteen hundred students in separate, in four schools.

UC-1: In four schools. Now, how many did you send to, to the schools?

YUEN: Yeah, I'm not sure I want to go over that on the phone but. . . .

UC-1: Okay, alright, understandable.

YUEN: [Y]eah, because of the . . . I mean, just . . . just want to tell you to watch out.

Further, YUEN informed UC-1 that Kats League planned to put on hold further recruiting efforts of illegitimate foreign students for the School pending the situation in Los Angeles and advised UC-1 that "we have to be very careful right now." Despite these reservations, YUEN contacted UC-1 on or about March 16, 2015, and engaged in a series of text message communications concerning additional recruiting efforts. YUEN told UC-1 that Kats League had approximately 40 students who were interested in transferring from the Los Angeles area institutions to the School. YUEN inquired whether UC-1 thought it was safe to accept the recruits given the fact the students could be traced back to their former bogus schools in Los Angeles. UC-1 expressed confidence that the School could evade exposure because it was located in New Jersey, far away from the ongoing situation in California. Ultimately, in an e-mail exchange on or about March 25, 2015, WEN referred at least five purported foreign students to the School, each of whom was formerly enrolled at one of the bogus Los Angeles-area schools.

11. In addition to Forms I-20, WEN and YUEN used the School to obtain other false and fraudulent documents for their clients that were intended to deceive U.S. immigration officials and to unlawfully obtain visa documents. For example, by e-mails dated February 9 and 10, 2016, WEN advised UC-1 that she needed to obtain a Form I-20 and an official School transcript for a Kats League recruit who was attempting to obtain a visa document from the U.S. Department of State ("DOS"). To expedite the process, WEN created, or caused to be created, and then e-mailed a fake School transcript to UC-1, which transcript included the student's name (CC-1), address, major course of study, GPA, and credits earned for classes purportedly taken at the School over the previous two semesters. This document was wholly false because this alleged student neither attended the School nor earned any credits at the School.

Subsequently, by e-mail dated on or about February 24, 2016, UC-1 sent WEN copies of a signed Form I-20, as well as a signed version of the fake transcript created by WEN. UC-1 further advised WEN that the original copies of the documents had been mailed via Federal Express to Kats League's California offices. After receiving copies of signed false documents from UC-1, WEN facilitated the student's and DOS's receipt of these fraudulent documents. Law enforcement agents' review of official records maintained by DOS has confirmed that the false School documents obtained by WEN for CC-1 were, in fact, submitted to U.S. immigration authorities in support of CC-1's visa application.