UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, Defendants.	**SEALED INDICTMENT** 26 Cr. 26 CRIM 329

COUNT ONE
(Conspiracy to Commit Marriage Fraud and Immigration Document Fraud)

The Grand Jury charges:

OVERVIEW

1. From at least in or about 2016 through in or about July 2026, in the Southern District of New York and elsewhere, AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants,

participated in an extensive marriage fraud scheme involving more than approximately 1,000 sham marriages between Chinese nationals and United States citizens and the submission of fraudulent applications to United States Citizenship and Immigration Services ("USCIS") seeking lawful permanent resident status for those foreign nationals.

2. AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," XIAO YAN CHEN, a/k/a "Anna," and GANG ZHENG, a/k/a "Michael," a/k/a "Mike," the defendants, acted as "facilitators" who orchestrated the marriage fraud scheme. As part of the scheme, facilitators paired foreign nationals seeking immigration status with United States citizens recruited by other scheme participants to engage in sham marriages, employing a series of service providers—including attorneys, tax preparers, and marriage officiants—to facilitate these sham marriages and submit fraudulent immigration applications to obtain lawful permanent residency for the foreign nationals. AMY CHENG acted as a facilitator from at least in or about August 2016 through in or about July 2026. CHAN acted as a facilitator from at least in or about November 2020 through in or about July 2026. LU acted as a facilitator from at least in or about January 2018 through in or about July 2026. CHEN acted as a facilitator from at least in or about August 2023 through or about July 2026. ZHENG acted as a facilitator from at least in or about July 2023 through in or about July 2026.

3. JING YAN YE, a/k/a "Serene," the defendant, acted as an assistant to scheme facilitators by coordinating a suite of services used by the marriage participants to execute their fraudulent immigration applications, including planning sham wedding ceremonies, preparing and submitting petitions to USCIS, and acting as a liaison between the sham marriage participants and other scheme participants or service providers who provided services in furtherance of the fraudulent immigration applications. YE operated an office based in a driving school in Sunset

Park, Brooklyn (the "Driving School"), that served as an operational hub for the scheme. YE acted as an assistant for AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," and CHRISTINE LU, a/k/a "Lily," the defendants, from at least in or about 2016 through in or about July 2026.

4. XIAO YAN CHEN, a/k/a "Anna," and ANTHONY CHENG, the defendants, acted as officiants who officiated dozens of sham marriages conducted in furtherance of the scheme. In addition to acting as a facilitator, CHEN officiated sham marriages from at least in or about January 2023 through at least in or about March 2025. ANTHONY CHENG officiated sham marriages from at least in or about November 2023 through at least in or about March 2026.

5. MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, ERIKA JOHNSON, the defendants, acted as "recruiters" for the facilitators by finding and recruiting United States citizens to enter into sham marriages arranged by the facilitators.

PROCEDURES FOR OBTAINING LAWFUL PERMANENT RESIDENT STATUS

6. USCIS is the agency within the United States Department of Homeland Security that oversees lawful immigration to the United States, including applications by foreign nationals for lawful permanent resident status (commonly known as a "Green Card").

7. In deciding whether foreign nationals are eligible for lawful permanent resident status, USCIS reviews applications and petitions, conducts interviews, obtains and reviews supporting documentation, and approves or denies applications and petitions.

8. A foreign national present in the United States who seeks to obtain lawful permanent residency in the United States may start the Green Card process by applying for an "adjustment of status" based on the foreign national's marriage to a United States citizen. That process generally entails the following, among other things:

a. First, the foreign national must have married a United States citizen, and the marriage must have been bona fide—*i.e.*, entered into for the purpose of establishing a genuine marital union as opposed to evading the immigration laws. The foreign national must show USCIS that they have terminated any prior marriages.

b. Second, following the marriage, the United States citizen spouse must file a USCIS Form I-130 Petition for Alien Relative, documenting their relationship to a foreign national. The foreign national must file a corresponding USCIS Form I-485 Application to Register Permanent Residence or Adjust Status. At the time the Forms I-130 and I-485 are submitted, the United States citizen spouse must also submit a USCIS Form I-864 Affidavit of Support Under Section 213A of the Immigration and Nationality Act, pursuant to which the United States citizen agrees to financially sponsor the foreign national. In conjunction with filing a Form I-864, the sponsor must submit evidence to support the financial information claimed on the form, which may include up to three years of tax returns, to demonstrate a household income greater than 125% of the Federal Poverty Guidelines in effect at the time of the application. If the United States citizen spouse is not eligible to sponsor the foreign national, then a second, "joint sponsor" may submit an additional Form I-864 in support of the foreign national application.

c. Third, after filing, USCIS reviews the submissions, conducts background and security checks, and generally conducts an in-person interview, among other things.

d. Fourth, if, following the interview, the application is approved and the married couple has been married for less than two years, then the foreign national is granted two-year conditional permanent resident status through a Green Card that is valid for only two years.

e. Fifth, to change conditional permanent resident status to non-conditional, during the 90-day period before the conditional permanent resident status expires, the foreign national must file a USCIS Form I-751, Petition to Remove Conditions on Residence. If USCIS approves the petition, the foreign national is granted lawful permanent resident status.

THE SCHEME

9. Facilitators, including AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," XIAO YAN CHEN, a/k/a "Anna," and GANG ZHENG, a/k/a "Michael," a/k/a "Mike," the defendants, used word of mouth, social media, and various forms of advertising to market fraudulent immigration services to foreign nationals—primarily citizens of the People's Republic of China—including their ability to arrange sham marriages to facilitate fraudulent applications for lawful permanent resident status in the United States.

10. Foreign nationals paid facilitators as much as approximately $100,000 for assistance in obtaining a sham marriage and applying for a Green Card.

11. As part of the scheme, facilitators, including AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," XIAO YAN CHEN, a/k/a "Anna," and GANG ZHENG, a/k/a "Michael," a/k/a "Mike," the defendants, paired each foreign national with a willing United States citizen, who the facilitators typically paid as much as approximately $30,000 to engage in a sham marriage. This payment to the United States citizen was generally made in three cash installments: first, after the couple married and the foreign national applied for a Green Card; second, after the foreign national received a conditional Green Card; and third, after the foreign national was granted lawful permanent resident status.

12. The facilitators typically found willing United States citizens with the assistance of recruiters, including MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, whom the facilitators generally selected from among the individuals who had previously engaged in sham marriages. As depicted in the images below,

ANTHONY CHENG, the defendant, officiated sham marriages involving CETINO and JOHNSON:

CETINO (left), ANTHONY CHENG (center), and a foreign national (right) in a sham marriage ceremony on or about December 17, 2024.

A foreign national (left), ANTHONY CHENG (center), and ERIKA JOHNSON in a sham marriage ceremony on or about January 15, 2025.

13. Facilitators typically paid recruiters a commission of as much as approximately $5,000 for each United States citizen they recruited for the scheme. When soliciting a United States citizen to engage in a sham marriage, recruiters generally collected the citizen's tax returns, birth certificate, driver's license, and other personal documents, as well as information regarding the individual's employment, income level, and marital history, among other things. This information was then passed on to one or more facilitators, who evaluated United States citizens for potential participation in the scheme based on, among other things, the individual's age, employment status, income (including whether the citizen would be eligible to submit a Form I-864), place of residence, length and timing of past marriages, and whether or not the individual had children.

14. Once the foreign national was paired with a willing United States citizen, the facilitators leveraged their network of co-conspirators to arrange a sham wedding ceremony.

Generally, the facilitator, recruiter, foreign national, and United States citizen met in the vicinity of a New York City Clerk's Office, where the foreign national and United States citizen obtained a marriage license. This was commonly the first time that the foreign national and United States citizen met.

15. After obtaining a marriage license, the foreign national and United States citizen generally participated in a sham wedding ceremony, often on the same day. Many of these sham wedding ceremonies were officiated by ANTHONY CHENG or XIAO YAN CHEN, a/k/a "Anna," the defendants. In some cases, these sham wedding ceremonies were held at nearby restaurants, where the foreign nationals and United States citizens changed into traditional Chinese wedding attire, and the facilitator, recruiter, foreign national, and United States citizen invited friends and family to create the appearance of a legitimate wedding, including as depicted below:

Image submitted to USCIS of a sham marriage ceremony purportedly held on or about October 7, 2023.

Image submitted to USCIS of a sham marriage ceremony purportedly held in or about March 2023.

Image submitted to USCIS of a sham marriage ceremony purportedly held in or about April 2023.

16. Although the facilitators and the recruiters operated primarily in New York, they orchestrated sham marriages across the United States and abroad, including in, among other places, Connecticut, Massachusetts, Pennsylvania, Kentucky, Tennessee, Georgia, Florida, Vanuatu, and the People's Republic of China. These sham marriages often involved travel to, from, and through the Southern District of New York. For example:

a. Between in or about 2020 and in or about 2023, AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," and JING YAN YE, a/k/a "Serene," the defendants, orchestrated at least approximately 100 sham marriages in Connecticut, including dozens officiated by a particular marriage officiant ("Officiant-1"). Two such sham marriage ceremonies are depicted in the images below, including a ceremony for a sham marriage involving ANGELA DUENAS, which MICHELLE DUENAS attended:

Foreign national (left), Officiant-1 (center), and U.S. citizen (right) in Connecticut

ANGELA DUENAS (left), Officiant-1 (center), foreign national (center-right) and MICHELLE DUENAS (far right)

b. Between in or about July 2023 and in or about May 2026, GANG ZHENG, a/k/a "Michael," a/k/a "Mike," the defendant, orchestrated dozens of sham marriages in Connecticut officiated by Officiant-1.

c. Between in or about May 2023 and in or about August 2025, AMY CHENG, CHAN, LU, and YE, conspired with a co-conspirator recruiter ("Co-Conspirator-1" or "CC-1") to recruit at least fourteen active members of the United States Army, all of whom were stationed at a United States Army base in Kentucky, to engage in sham marriages with foreign nationals, including approximately eleven citizens of the People's Republic of China.

d. On at least one occasion between in or about May 2023 and in or about August 2025, LU and CC-1 traveled from New York to Kentucky and Tennessee to facilitate two sham marriages involving members of the United States Army.

e. On at least six occasions between in or about May 2023 and in or about August 2025, members of the United States Army traveled to New York City to engage in sham marriages orchestrated by AMY CHENG, CHAN, LU, YE, and CC-1, including at least:

i. One sham wedding ceremony depicted in the image below, which was officiated by CHEN:

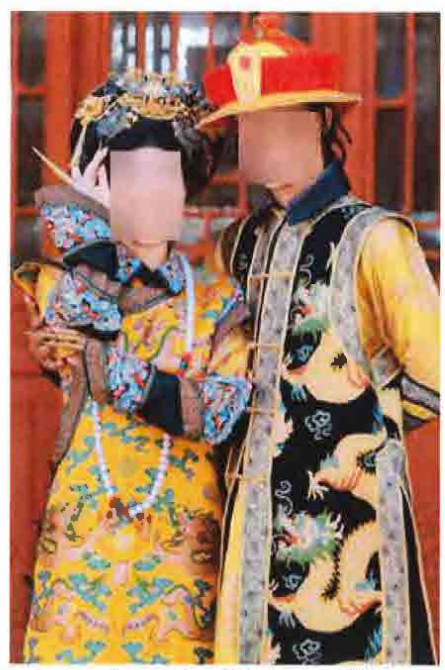
Image submitted to USCIS of a sham marriage ceremony purportedly held in or about March 2025.

ii. Four sham wedding ceremonies officiated by ANTHONY CHENG, the defendant, two of which are depicted in the images below.

ANTHONY CHENG (right)

ANTHONY CHENG (center)

f. AMY CHENG, CHAN, LU, and YE also facilitated sham marriages conducted overseas, including in the People's Republic of China, as depicted in the images below:



Images submitted to USCIS of a sham marriage conducted in Tieling, China.

17. On the day of a sham marriage ceremony—or at a later date if the ceremony took place outside of the New York area—married couples generally visited one of several offices affiliated with the scheme, including the Driving School, to sign forms for submission to USCIS, obtain information about the USCIS interview process, and execute a pre-nuptial agreement in which, among other things, each spouse purportedly waived their rights to share in the other's estate upon death, to spousal maintenance, to claims in marital property, and to child support. For example, one such pre-nuptial agreement provided that, "except in the name of husband and wife, both parties live independently and must not interfere with each other."

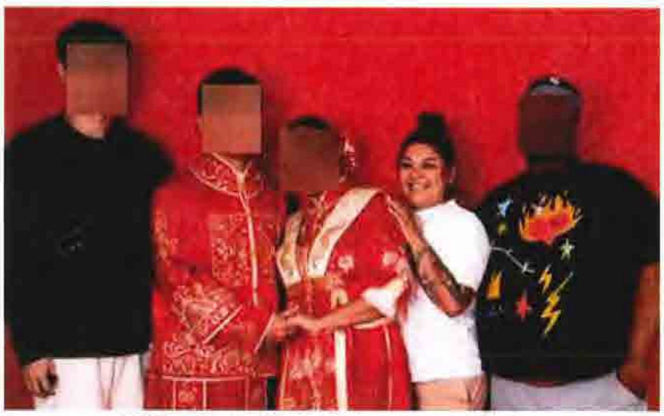
18. After the sham marriage, the facilitators connected the foreign nationals with others, including JING YAN YE, a/k/a "Serene," the defendant, to prepare and submit fraudulent Green Card applications and shepherd the sham-married couples through the immigration process.

19. In the months between a sham marriage ceremony and a married couple's expected interview with USCIS, the married couples—with the assistance of facilitators, the recruiters, JING YAN YE, a/k/a "Serene," and ANTHONY CHENG, the defendants—typically worked together to manufacture evidence in support of their fraudulent Green Card applications. This included, among other things: compiling photographs of the sham marriage ceremony; taking additional photographs together and with others; opening joint bank, utility, and mobile phone accounts; filing joint tax returns; and purchasing life insurance policies for which the other spouse was the beneficiary, many of which were sold by ANTHONY CHENG. Married couples typically submitted that manufactured evidence to USCIS in connection with their interviews. As depicted

below, the facilitators and recruiters themselves often appear in the photos submitted to USCIS in support of fraudulent Green Card applications:

AMY CHENG (left)

ANGELA DUENAS (left)



SIGRID CETINO (center-right)

JING YAN YE (center)

20. During the period prior to the issuance of a conditional Green Card, the recruiters were often responsible for ensuring the United States citizens' continuing participation in the activities described above and their compliance with the terms of the sham marriage. For example, on or about November 12, 2024, AMY CHENG, a/k/a "Amy Zhou," the defendant, sent MICHELLE DUENAS, the defendant, the following message concerning a United States citizen:

> I'm not received a copy of this girl SS [social security]. And three years of tax bills, and pay slips etc. Ten days have passed and no information has been sent. Moreover, she wants to ask the boy for money to buy food. This is impossible. ***You remind her that this is a business transaction, and he is not her real husband.*** He has no right or obligation to give her living expenses. Don't bring trouble to me.

21. In advance of a married couple's interview with USCIS, married couples—at the direction of the facilitators, including AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," XIAO YAN CHEN, a/k/a "Anna," and GANG ZHENG, a/k/a "Michael," a/k/a "Mike," the defendants, the recruiters, including MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and JING YAN YE, a/k/a "Serene," the defendant—generally participated in training sessions in which the married couples received instruction regarding the questions that USCIS would likely ask and the answers the married couples should provide in response.

22. When a foreign national successfully obtained a conditional Green Card, the facilitators arranged for the United States citizen to receive the second installment payment, typically in the amount of approximately $15,000. Similarly, when, approximately two years after a sham marriage, a foreign national successfully obtained a permanent Green Card, the facilitators arranged for the United States citizen to receive the third and final installment payment, typically in the amount of approximately $5,000.

23. After a foreign national was granted a permanent Green Card—or sooner if the Green Card application was denied or withdrawn—facilitators, including AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," XIAO YAN CHEN, a/k/a "Anna," and GANG ZHENG, a/k/a "Michael," a/k/a "Mike," the defendants, recruiters, including MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and JING YAN YE, a/k/a "Serene," the defendant, generally assisted the sham-married couple with obtaining a divorce.

STATUTORY ALLEGATIONS

24. From at least in or about 2016 through in or about July 2026, in the Southern District of New York and elsewhere, AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, marriage fraud, in violation of Title 8, United States Code, Section 1325(c), and immigration document fraud, in violation of Title 18, United States Code, Section 1546(a).

25. It was a part and object of the conspiracy that AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and others known and unknown, would and did knowingly enter into marriages for the purpose of evading provisions of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

26. It was further a part and an object of the conspiracy that AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and others known and unknown, would and did knowingly utter, use, attempt to use, possess, obtain, accept, and receive an immigrant and nonimmigrant visa,

permit, border crossing card, alien registration receipt card, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing it to be forged, counterfeited, altered and falsely made, and to have been procured by means of a false claim and statement, and to have been otherwise procured by fraud and unlawfully obtained, to wit, AMY CHENG, CHAN, LU, YE, CHEN, ZHENG, ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, CETINO, and JOHNSON assisted foreign nationals in entering into sham marriages in the United States and using those sham marriages to fraudulently procure lawful permanent resident cards, in violation of Title 18, United States Code, Section 1546(a).

27. It was further a part and an object of the conspiracy that AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and others known and unknown, would and did knowingly make under oath, and as permitted under penalty of perjury under section 1746 of title 28, United States Code, knowingly subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly present such an application, affidavit, and other document which contains such a false statement and which fails to contain any reasonable basis in law and fact, to wit, AMY CHENG, CHAN, LU, YE, CHEN, ZHENG, ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, CETINO, and JOHNSON assisted foreign nationals and U.S. citizens in making false statements to immigration authorities in connection with applications for

lawful permanent resident cards, including, among other things, representing sham marriages to be bona fide marriages, in violation of Title 18, United States Code, Section 1546(a).

Overt Acts

28. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. Between in or about 2016 and in or about July 2026, AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," and GANG ZHENG, a/k/a "Michael," a/k/a "Mike," the defendants, caused the submission of hundreds of fraudulent Green Card applications and associated documents to the New York and Brooklyn field offices of USCIS, both of which are located in the Southern District of New York.

b. Between in or about 2016 and in or about July 2026, AMY CHENG, CHAN, LU, YE, CHEN, and ZHENG, the defendants, orchestrated hundreds of sham marriages for the purpose of evading provisions of the immigration laws, including, on or about January 15, 2025, the sham marriage of ERIKA JOHNSON, the defendant, to a foreign national, for which JOHNSON traveled from Westchester County, New York to Staten Island, New York to engage in a sham marriage officiated by ANTHONY CHENG, the defendant.

c. Between in or about March 2020 and in or about July 2023, AMY CHENG, LU, CHAN, and YE, the defendants, transported dozens of individuals through the Southern District of New York to Connecticut to engage in sham marriages for the purpose of evading provisions of the immigration laws, including, on or about June 25, 2021, the sham marriage of ANGELA DUENAS, the defendant, to a foreign national.

d. Between in or about July 2023 and at least in or about May 2026, ZHENG transported dozens of individuals through the Southern District of New York to Connecticut to engage in sham marriages for the purpose of evading provisions of the immigration laws, including a sham marriage conducted on or about July 24, 2023 in Middletown, Connecticut.

e. Between in or about 2017 and in or about July 2026, MICHELLE DUENAS and ANGELA DUENAS, the defendants, recruited United States citizens to engage in sham marriages to foreign nationals for the purpose of evading provisions of the immigration laws, including a sham marriage conducted on or about May 15, 2024, in connection with which the sham-married couple was interviewed by USCIS in Manhattan, New York.

f. Between in or about January 2025 and at least in or about October 2025, SIGRID CETINO, the defendant, and JOHNSON recruited United States citizens in Westchester County, New York to engage in sham marriages to foreign nationals for the purpose of evading provisions of the immigration laws, including a sham marriage conducted on or about March 1, 2025 in Staten Island, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Conspiracy to Encourage the Unlawful Residence of Aliens in the United States)

The Grand Jury further charges:

29. The allegations set forth in paragraphs 1 through 23 are repeated and realleged as if set forth fully herein.

30. From in or about 2016 through in or about July 2026, in the Southern District of New York and elsewhere, AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS,

ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 8, United States Code, Section 1324(a)(1)(A)(iv).

31. It was a part and object of the conspiracy that AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, and others known and unknown, would and did encourage and induce an alien to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence is and would be in violation of law, to wit, AMY CHENG, CHAN, LU, YE, CHEN, ZHENG, ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, CETINO, JOHNSON, and others known and unknown, assisted foreign nationals in obtaining lawful permanent resident cards, also known as "Green Cards," by, among other means, creating fraudulent financial support affidavits, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

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

FORFEITURE ALLEGATION

32. As a result of committing the offense alleged in Count One of this Indictment, AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, shall forfeit to the United States, pursuant to Title 18 United States Code Section 982(a)(6), all conveyances, including any vessel,

vehicle, or aircraft, used in the commission of said offense; all property, real and personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

33. As a result of committing the offense alleged in Count Two of this Indictment, AMY CHENG, a/k/a "Amy Zhou," XIAO MEI CHAN, a/k/a "Carmen," CHRISTINE LU, a/k/a "Lily," JING YAN YE, a/k/a "Serene," XIAO YAN CHEN, a/k/a "Anna," GANG ZHENG, a/k/a "Michael," a/k/a "Mike," ANTHONY CHENG, MICHELLE DUENAS, ANGELA DUENAS, SIGRID CETINO, and ERIKA JOHNSON, the defendants, shall forfeit to the United States, pursuant to Title 8, United States Code, Section 1324(b), Title 18 United States Code Section 982(a)(6), and Title 28, United States Code, Section 2461, all conveyances, including any vessel, vehicle, or aircraft, used in the commission of said offense, and all property traceable to such conveyances; the gross proceeds of said offense, and all property traceable to such proceeds; all property, real and personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

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

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 8, United States Code, Section 1324;
Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

[redacted]
FOREPERSON

James M. McDonald
JAMES M. McDONALD
United States Attorney