

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
RANDY WANG, :
:
Defendant. :
----- X

INFORMATION

18 Cr.

18 CRIM 241

JUDGE KEENAN

COUNT ONE
(Wire Fraud)

The United States Attorney charges:

Background

1. At all times relevant to this Information, a company located in New York, New York not named herein (the "Company") managed a global airline alliance whose members consisted of approximately 13 international airlines and approximately 30 of the airlines' affiliates. From in or about July 2014 through in or about November 2017, RANDY WANG, the defendant, was employed by the Company as a Business Manager. For the last approximately two months of his employment with the Company, WANG also served as a Finance Manager at the Company.

2. In his capacity as the Company's Business Manager, RANDY WANG, the defendant, had access to the Company's corporate credit card account (the "Company Credit Card Account"). WANG was issued a credit card in WANG's name under the Company Credit

Card Account to enable WANG to make purchases on behalf of the Company. WANG also had access to the Company's books and records, including the electronic accounting system that the Company used to, among other things, track and audit the Company's expenses (the "Accounting System").

The Scheme to Defraud

3. From at least in or about January 2016 through in or about October 2017, RANDY WANG, the defendant, defrauded the Company, located in New York, New York, by converting to his use and the use of others items that WANG had purchased using the Company Credit Card Account, in a total value of approximately \$2,214,404, without the authorization of the Company. These items included at least 443 laptop computers, 241 mobile electronic devices, 24 tablet computers, and numerous other electronics and electronics accessories (collectively, the "Electronics"). WANG had no legitimate business purpose in purchasing the Electronics using the Company Credit Card Account.

4. From in or about 2016 through in or about October 2017, in furtherance of the scheme to defraud, RANDY WANG, the defendant, in order to accomplish and evade detection of this unauthorized use of the Company Credit Card Account, changed, and caused to be changed, entries in the Accounting System

related to his unauthorized use of the Company Credit Card Account.

Statutory Allegations

5. From at least in or about January 2016 through in or about October 2017, in the Southern District of New York and elsewhere, RANDY WANG, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals and sounds for the purpose of executing such scheme and artifice, to wit, WANG defrauded the Company during his employment as the Company's business manager, by converting funds that belonged to the Company to his own use and the use of others, including through the use of the internet and wire transfers.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATION

6. As a result of committing the offense alleged in Count One of this Information, RANDY WANG, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section § 981(a)(1)(C) and Title 28, United States Code, Section § 2461, any property, real and personal,

constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of the offense, including but not limited to:

a. A sum of money of at least \$2,214,404, in United States currency.

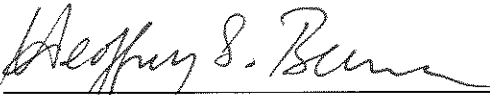
Substitute Asset Provision

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

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and 982(b), Title 21, United States Code, Section 853, Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
United States Attorney

3-27-18 (WR)

Filed Information and
Waiver of Indictment
- Keenan, J.

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

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Sections 1343 and 2.)

GEOFFREY S. BERMAN
United States Attorney.
