

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 23cr10130
)	
LITANG LIANG,)	Violations:
)	
Defendant.)	<u>Count One</u> : Conspiracy to Act as an
)	Agent of a Foreign Government
)	(18 U.S.C. § 371)
)	
)	<u>Count Two</u> : Acting as an Agent
)	of a Foreign Government Without Notice to
)	the Attorney General(18 U.S.C. § 951)
)	

INDICTMENT

At all times relevant to this Indictment:

General Allegations

1. LITANG LIANG (“LIANG”) was a citizen of the of the United States of America, residing in Brighton, Massachusetts.
2. Beginning in or around 2018, and continuing through at least 2022, LIANG acted within the United States as an agent of the government of the People’s Republic of China (“PRC”). LIANG’s acts included providing the PRC government with information on Boston-area individuals and organizations; organizing a counter-protest in the United States against pro-democracy dissidents; providing photographs of and information about U.S.-based dissidents to PRC government officials; and providing the names of potential recruits to the PRC’s Ministry of Public Security. At no point did LIANG notify the United States Attorney General that he was acting as a PRC government agent.

3. LIANG communicated with the PRC government officials – knowing them to be PRC government officials – in several ways. These included telephone calls and messages using the social media application WeChat. WeChat is the international version of the PRC-based electronic communication app Weixin that can be downloaded to a user’s mobile phone. WeChat currently has over one billion active users. Its uses include text messaging, voice messaging, and photo and video sharing. All WeChat communications are stored on servers outside the United States.

Early Communications with PRC OFFICIAL 1 and Others

4. Beginning in or around 2018, LIANG communicated with a PRC government official (“PRC OFFICIAL 1”) who at all relevant times was a consular officer at the PRC Consulate in New York (“PRCCONNY”) and an employee of the PRC government. Beginning in that year, LIANG provided PRC OFFICIAL 1 and others with information about Chinese individuals and organizations in the Boston area. This information included the following:

- a. In July 2018, LIANG reported to PRC OFFICIAL 1 that someone had destroyed PRC flags in Boston’s Chinatown and provided PRC OFFICIAL 1 with the name of a former “student activist”¹ whom LIANG believed was responsible.
- b. In or around August 2018, LIANG informed an associate of LIANG (Individual 1) that the PRCCONNY wanted to know about the “political standing” of a local lawyer, Individual 2, and asked Individual 1 if he/she knew the lawyer.
- c. In or around August 2018, LIANG informed Individual 1 that the “Consulate” was coming to Boston, and asked Individual 1 if he/she wanted to meet with

¹ Unless otherwise stated, all communications quoted within this Indictment involving LIANG and other individuals were originally in Chinese, and the quotations are translations of those communications.

them in order to discuss the “blacklist.” LIANG also informed Individual 1 that PRC OFFICIAL 1 wanted “something done” about the flag removal incident. Approximately six days later, Individual 1 sent LIANG an email entitled “Black Name List.”

- d. In or around September 2018, LIANG helped to organize an event in Boston which was attended by PRC OFFICIAL 1 and a high ranking official at PRCCONNY (“PRC OFFICIAL 2”). A few days later, PRC OFFICIAL 1 asked LIANG for the name of a specific individual who had attended the event, and who worked for an elected official in Boston. LIANG provided PRC OFFICIAL 1 with the individual’s name and title.
- e. On or about October 5, 2018, LIANG shared with PRC OFFICIAL 2 photographs and videos of the individual he claimed had “sabotaged” the PRC flags, and claimed to have held a press conference to denounce that individual. Three days later, LIANG shared an article with PRC OFFICIAL 2, which accused a member of Organization A, a local Chinese community organization which has pro-Taiwan leanings, as the person who “sabotaged” the Chinese flags.
- f. On or about December 6, 2018, PRC OFFICIAL 1 requested that LIANG tell him/her how many individuals worked for Organization A. Later that same day, LIANG and PRC OFFICIAL 1 had a 15-minute telephone conversation.
- g. On or about February 10, 2019, LIANG and PRC OFFICIAL 1 spoke by telephone for approximately 12 minutes. Several days later, LIANG sent PRC

OFFICIAL 1 a list of members of Organization B, a local Chinese organization with pro-Taiwan leanings.

- h. On or about February 21-22, 2019, LIANG provided PRC OFFICIAL 1 information about local Chinese family associations in New England and New York (Organization C, Organization D, and Organization E), including the size of the groups' memberships and the names of some group leaders.

*Establishment of the New England Alliance
for the Peaceful Unification of China*

5. In or around October 2018, PRC OFFICIAL 1 connected LIANG with another PRC government official ("PRC OFFICIAL 3"), who directed a subsidiary entity of the United Front Work Department ("UFWD").² The UFWD itself reports directly to the Central Committee of the Chinese Communist Party ("CCP").³ The UFWD's mission is to coordinate "United Front" work, which involves utilizing a coalition of groups and individuals to further the goals of the CCP. UFWD's work entails influencing and co-opting targets, and bringing together agencies, social organizations, businesses, universities, research institutes, and individuals to further the CCP's goals.

6. LIANG subsequently communicated with PRC OFFICIAL 3. PRC OFFICIAL 3 sent information to LIANG regarding his organization, including a form to attend conference of that organization in the PRC. LIANG returned the completed form. Travel records indicate that LIANG traveled to the PRC on two occasions over the next month: first from approximately

² The subsidiary entity seeks to promote the unification of Taiwan with the PRC, which is a core PRC national security goal.

³ The CCP is the founding and sole ruling party of the PRC. National governmental authority in the PRC is exercised through the CCP and the State Council.

October 23, 2018 through October 27, 2018, and then from approximately November 4, 2018 through November 15, 2018. On November 2, 2018, LIANG sent PRC OFFICIAL 3 a message saying that he regretted that they had been unable to meet on his prior visit, and that he would soon be returning to the PRC with other Boston leaders.⁴ LIANG also sent PRC OFFICIAL 3 his upcoming itinerary, which included meetings with the UFWD and the Taiwan Affairs Office of the State Council, a PRC government agency that promotes the unification of Taiwan with the PRC.

7. Prior to traveling to that conference in the PRC, LIANG also communicated with PRC OFFICIAL 4, a PRC government official who at all relevant times worked for a separate organization whose leadership is composed of CCP members and whose activities are overseen by the CCP. PRC OFFICIAL 4 asked LIANG to provide the names of the individuals attending the conference, as well as the most influential organizations that would be traveling with LIANG. Subsequently, on or about October 24, 2018, while LIANG was in the PRC, PRC OFFICIAL 4 asked LIANG to provide information on, among other things, overseas Chinese living in the Boston area, and information about Organization A. LIANG informed PRC OFFICIAL 4 that he had communicated the request to a local community leader, Individual 3, and that Individual 3 would report the information directly to PRC OFFICIAL 4.

8. In or around December 2018, LIANG communicated with another PRC government official (“PRC OFFICIAL 5”), who at all relevant times worked for the PRC government at PRCCONNY in New York as part of the Taiwan Affairs Office of the State Council. Later that same month, PRC OFFICIAL 5 traveled to Boston with members of PRCCONNY,

⁴ LIANG subsequently traveled to the PRC with Individuals 1 and 3, among others.

including PRC OFFICIAL 2, and met with LIANG and others. In his phone contact list, LIANG listed PRC OFFICIAL 5's name with the title "Consulate."

9. On or about December 20, 2018, LIANG informed PRC OFFICIAL 2 that the work for setting up a new reunification organization was ready, with the "core team" identified.

10. In or around January 2019, LIANG co-founded the New England Alliance for the Peaceful Unification of China ("NEAPUC") and subsequently served as its Vice President. In prior years, a similar organization had existed in Boston ("Boston Group" or "BG").

11. On or about April 22, 2019, LIANG sent NEAPUC's logo to both PRC OFFICIAL 1 and PRC OFFICIAL 5, and also sent NEAPUC's incorporation documents to PRC OFFICIAL 5. LIANG also informed PRC OFFICIAL 5 that NEAPUC had developed a "core team" from local organizations, that NEAPUC had strict membership qualifications, and that he could provide more details over the phone. A few days beforehand, on or about April 18, 2019, LIANG also sent a WeChat message to Individual 4, a leader of separate reunification organization in the United States. LIANG informed Individual 4 that his organization (NEAPUC) consisted of the chairmen of local community associations and had high standards for accepting new members. LIANG also informed Individual 4 that he would rather discuss the details over the phone.

The Hong Kong Rally

12. In or around 2019, the Hong Kong government (with the support of the PRC government) proposed a Fugitive Offenders and Mutual Legal Assistance bill, which would provide for the extradition of individuals in Hong Kong to mainland China for criminal prosecution. In the aftermath, extensive protests against the proposed legislation occurred in Hong Kong.

13. In or around August 2019, individuals across the world organized rallies to support the anti-extradition protesters in Hong Kong. In Boston, supporters of the protesters in Hong Kong organized a march called “Boston Stands with Hong Kong” for August 18, 2019 (the “Boston Hong Kong Rally”), with plans to march from the Massachusetts State House to Chinatown.

14. On or about August 17-18, 2019, LIANG engaged in a series of communications with other individuals, including PRC government officials, about organizing a counter-protest to the Boston Hong Kong Rally:

- a. At or about 11:48 a.m.⁵ on August 17, 2019, PRC OFFICIAL 5 sent LIANG a link to a Facebook page which discussed worldwide rallies taking place between August 16-18, 2019 in support of the pro-democracy, anti-extradition movement in Hong Kong.
- b. At or about 11:49 a.m. on August 17, 2019, LIANG sent the same Facebook link to Individual 5, the NEAPUC President.
- c. At or about 2:58 p.m. on August 17, 2019, LIANG sent the same Facebook link to three members of NEAPUC.
- d. At or about 10:03 p.m. on August 17, 2019, LIANG attempted to call PRC OFFICIAL 5, but did not connect.
- e. At or about 10:29 p.m. on August 17, 2019, Individual 4 sent LIANG a post made by the Boston Group on a local Boston WeChat group. At or about 10:32 p.m. on August 17, 2019, Individual 4 informed LIANG that the screenshot was the WeChat message that BG Individual A⁶ had sent about the next day’s

⁵ All times referenced regarding the Boston Hong Kong Rally are Eastern Daylight Time (EDT).

⁶ BG Individual A had previously left the United States for the PRC and had not returned.

gathering, and that it would be very helpful if LIANG's group could support it.

LIANG responded to Individual 4 that he would definitely provide support.

- f. At or about 10:49 p.m. on August 17, 2019, LIANG sent two voice memos to PRC OFFICIAL 5.
- g. At or about 10:55 p.m. on August 17, 2019, LIANG sent videos to PRC OFFICIAL 5 regarding a Hong Kong counter-protest LIANG and Individual 5 had attended earlier that day in New York.
- h. At or about 11:09 p.m. on August 17, 2019, PRC OFFICIAL 5 called LIANG, and they spoke on the phone for approximately 10 minutes.
- i. Between about 11:35 p.m. and 11:42 p.m. on August 17, 2019, LIANG sent several messages and videos of that day's Hong Kong pro-democracy protest in New York to members of the Boston Group.
- j. At or about 12:04 a.m. on August 18, 2019, BG Individual B⁷ sent information about an upcoming counter-protest to LIANG. On or about 12:11 a.m. on August 18, 2019, LIANG responded to BG Individual B with a screenshot of what appears to be an itinerary relating to the counter-protest. BG Individual B responded that the plans had changed.
- k. At or about 12:20 a.m. on August 18, 2019, LIANG sent a message to four members of NEAPUC, stating: "‘Hong Kong independence’ activists will gather near the State House tomorrow (18th) at 2pm. Hope everyone can notify

⁷ BG Individual B had previously left the United States for the PRC and had not since returned to the United States.

your friends and family to take some time and gather at the same place, and denounce the ‘Hong Kong independence activists’ together. Thank you!”

1. At or about 1:11 a.m. on August 18, 2019, LIANG asked PRC OFFICIAL 1 to notify two members of Organization F, a local Chinese community organization, to gather in front of the State House to condemn the Hong Kong activists. LIANG further stated that he did not have time to arrange the flags, but believed that Organization F or Organization G would have flags available for the event. At our about 7:47 a.m. on August 18, 2019, PRC OFFICIAL 1 responded to LIANG “thank you for your hard work!”, and then said that “for matters related to [Organization G],” LIANG should contact the organization “directly,” because “it is not very appropriate for me to talk to them... [T]his kind of thing should be mostly voluntary. It would probably put some pressure on them if I talk. But you can tell them ‘I heard from [PRC OFFICIAL 1] that you may still have some small flags.’ This way, they will probably know that I am aware of this matter. Then, however they want to handle it specifically will be up to them, voluntarily.”

15. On or about 2:00 p.m. on August 18, 2019, around the start of the Boston Hong Kong Rally, a large number of counter-protesters arrived and chanted pro-PRC slogans. LIANG was present and passed out a large PRC flag to the counter-protesters.

16. During the Boston Hong Kong Rally, LIANG took numerous photographs and videos of both counter-protesters and the anti-extradition, pro-democracy dissidents.

17. Between approximately 3:27 p.m. and 3:34 p.m. on or about August 18, 2019, during the Boston Hong Kong Rally, LIANG exchanged four phone calls with PRC OFFICIAL 2, lasting a total of approximately seven minutes.

18. During the Boston Hong Kong Rally, beginning at about 3:43 p.m., LIANG also placed a telephone call to PRC OFFICIAL 1. They spoke for approximately three minutes.

19. After the Boston Hong Kong Rally that evening, at or about 7:37 p.m., LIANG and PRC OFFICIAL 1 spoke on the phone for approximately eight minutes. LIANG also sent photographs and videos of the counter-protesters to both PRC OFFICIAL 1 and PRC OFFICIAL 5.

20. After the Boston Hong Kong Rally, on or about August 18, 2019, LIANG sent a message to BG Individual A and BG Individual B. LIANG informed them that his organization had provided the Chinese flag, bragged about the success of the counter-protest, and claimed that his organization had done a better job than others. After receiving no response from BG Individual A and BG Individual B, LIANG asked if BG Individual B was afraid of LIANG stealing his prestige, and advised BG Individual B to change his behavior because if he did not, eventually BG Individual B would be “casted aside.”

21. On or about August 19, 2019, LIANG sent a WeChat message to PRC OFFICIAL 6, who at the time was one of the highest-ranking PRC diplomats in the United States. The WeChat message included a video of the Boston Hong Kong Rally showing one of the anti-extradition, pro-democracy dissidents. LIANG informed PRC OFFICIAL 6: “The guy holding the microphone ([Individual 6]) is the rascal who damaged the national flags last year. He was berated by the crowd yesterday!”

22. On or about August 19, 2019, LIANG exchanged messages with Individual 7, a professor from Jinan University (a university that is overseen by two separate PRC government agencies, one of which is the UFWD), who at the time was a visiting academic at University 1 in Boston. LIANG informed Individual 7 that he had been tasked on the afternoon of August 17, 2019 with building the counter-protest in Boston, that he sent numerous WeChat messages late at night to make it happen, and that he was the individual who notified everyone about the counter-protest. Individual 7 also told LIANG that he should communicate with students more frequently. LIANG responded: “By doing this type of job, you must be super careful about what to do and what to say in public, especially on those sensitive topics.”

Additional Acts by LIANG

23. On September 2, 2019, LIANG photographed anti-PRC dissidents in front of the Boston Public Library. He then sent those photographs to PRC OFFICIAL 1, stating that they were a “bunch of clowns trying to cause trouble.”

24. On or about September 4, 2019, PRC OFFICIAL 1 invited LIANG to an event in the PRC from September 27-October 2, 2019, for a celebration of the 70th anniversary of the establishment of the PRC.

25. On or about September 21, 2019, LIANG departed the United States for the PRC for events commemorating the 70th anniversary of the establishment of the PRC. He returned to the United States on or about October 2, 2019. While in the PRC, LIANG attended events hosted by the UFWD and other PRC government agencies, including a conference, a reception at the Great Hall, and a PRC military parade commemorating the establishment of the PRC.

26. On or around September 26, 2019, while he was in the PRC, LIANG sent a message to PRC OFFICIAL 5. He informed her that the peaceful unification conference he had recently

attended had been “very successful,” that he had “learned a lot,” and that the conference clarified his “direction of work.”

27. In or around November 2019, LIANG sent a summary of NEAPUC’s work in 2019 to PRC OFFICIAL 3 (the “2019 Work Summary”). The 2019 Work Summary listed the activities as directly quoted below:

- i. Held all-members meeting every two months since January to study NEAPUC’s mission, tasks, and work methods, to hold group discussions and speeches to express individual opinions, and to improve members’ qualities and abilities to carry out the unification work.
- ii. June 15, organized members to participate and assist the PRC Consulate of New York [PRCCONNY] in their 2019 Consulate Community Services for passport renewal.
- iii. June 30, organized and participated in the activities of the Photo Exhibition of the 40th Anniversary of the Establishment of Diplomatic Relations between China and U.S. in Boston Chinatown.
- iv. August 18, working with Chinese overseas students in Boston, organized over a thousand patriots to gather in front of the MA State Capital Building and in Boston Chinatown to denounce people who supported Hong Kong independence, Taiwan independence, Tibet independence, and Xinjiang independence.
- v. September 15, hang PRC national flags on the streets of Boston Chinatown to celebrate the China National Day.
- vi. September 22, successfully held the first Peaceful Unification of China Forum, received significant media coverage in the Boston area, made a huge impact.
- vii. September 29, organized and participated in the annual celebratory ceremony of raising the PRC

national flag in Boston City Hall. Later on the same day, hosted a party with close to 700 attendants. [PRC OFFICIAL 2] ... and several other officials were present at the activities for the entire day.

- viii. October 1 – October 30, held the first month-long Photo Exhibition of the 40th Anniversary of the Establishment of Diplomatic Relations between China and U.S. at [a Boston-area] Library, invited the mayor, city councilor, and other dignitaries to the reception.
- ix. November 2, organized and participated in the 2nd 2019 Consulate Community Services for passport renewal.
- x. November 1 – November 3, NEAPUC leaders participated in [unification organization meetings with other U.S.-based unification groups].

28. On or about December 13, 2019, LIANG also sent the 2019 Work Summary to PRC OFFICIAL 5.

29. In or around November and December 2019, LIANG sent PRC OFFICIAL 1 updates regarding the election for Chairman of Organization A. In early December, LIANG informed PRC OFFICIAL 1 that a pro-Taiwan individual was attempting to get the new Chairman of Organization A “on their side,” and indicated that they needed to “win this secret battle.” Subsequently, in January 2020, LIANG informed PRC OFFICIAL 1 that he had spoken to the new Chairman of Organization A, and that the Chairman was now “leaning toward their side.” He also informed PRC OFFICIAL 1 that he had encouraged the Chairman of Organization A to make a trip to China, and said that he would encourage the Chairman of Organization A to invite the PRC consular officials to a New Year’s banquet.

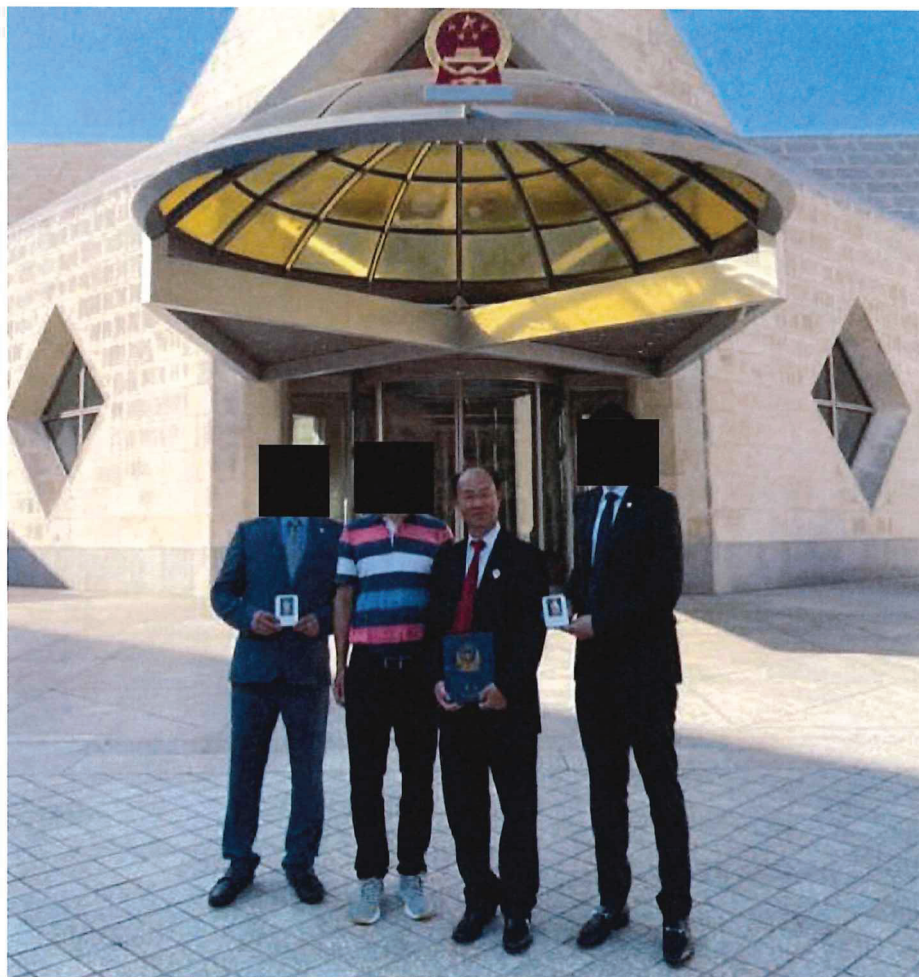
Ministry of Public Security

30. Beginning in or around 2019, and continuing through at least 2022, LIANG communicated with PRC OFFICIAL 7, who was listed in LIANG's contact list as "DC Ministry of Public Security Shanghai." Although the Ministry of Public Security (MPS) is a PRC domestic law enforcement agency responsible for public safety and law enforcement, it also serves functions associated with intelligence services and national security. It is tasked with investigating political dissidents.

31. On or about July 11, 2022, PRC OFFICIAL 7 and LIANG had a phone call that lasted approximately 18 minutes. Subsequently, on or about July 12, 2022, PRC OFFICIAL 7 and LIANG had another phone call that lasted approximately 10 minutes. Soon thereafter, on that same day, PRC OFFICIAL 7 asked LIANG to provide him with the information regarding two "vice presidents" within the overseas Chinese community and said that he would provide for LIANG and the two "vice presidents" to tour the Chinese Embassy.

32. Later that same day, on or about July 12, 2022, LIANG sent PRC OFFICIAL 7 the names of two individuals: Individual 8, the Chairman of Organization H, and the owner of Company 1, and Individual 9, the Vice Chairman of Organization I and the owner of Restaurant 1. LIANG informed PRC OFFICIAL 7 that Individuals 8 and 9 were both young and capable, and were the best candidates for PRC OFFICIAL 7 to cultivate and train. PRC OFFICIAL 7 confirmed that he received the information, and indicated that he would get to know Individuals 8 and 9 later that week.

33. Photographs from LIANG's WeChat conversations with PRC OFFICIAL 7 shows that, shortly thereafter, LIANG visited the PRC Embassy with Individuals 8 and 9 and met with PRC OFFICIAL 7. In this photograph, LIANG can be seen standing at the front of the PRC Embassy with PRC OFFICIAL 7 and Individuals 8 and 9:



34. Another close-up version of the photograph indicates that LIANG is holding a plaque which says “Police.”



Object and Purpose of the Conspiracy

35. The object and purpose of the conspiracy was to act at the direction or control of the PRC government in order to covertly advance the PRC government’s goals and agenda within the United States.

Manner and Means of the Conspiracy

36. The manner and means by which LIANG and coconspirators, known and unknown to the Grand Jury, carried out the conspiracy were, among other things, the following:

- a. Communicating with PRC government officials in order to provide them with information about individuals and organizations within Massachusetts that were of interest to the PRC government.
- b. Carrying out activities in Massachusetts for the benefit of the PRC government, and at the direction or control of PRC government officials.
- c. Establishing NEAPUC in order to appear to be acting as a member of a local community organization unconnected to the PRC government, when in fact he was acting at the direction or control of the PRC government.

Acts in Furtherance of the Conspiracy

37. From in or about 2018 through at least 2022, LIANG and coconspirators known and unknown to the Grand Jury committed and caused to be committed the following overt acts, among others, in furtherance of the conspiracy:

- a. In July 2018, LIANG reported to PRC OFFICIAL 1 that someone had destroyed PRC flags in Chinatown, and provided PRC OFFICIAL 1 with the name of a “former student activist” whom LIANG believed was responsible.
- b. In or around September 2018, at the request of PRC OFFICIAL 1, LIANG provided the name of a Boston government official who had attended an event that LIANG had helped to organize, and which had been attended by PRC OFFICIAL 2.
- c. In or around October 2018, LIANG provided PRC OFFICIAL 2 with photographs and videos of an individual whom he believed had destroyed PRC flags in Chinatown.
- d. In or around January 2019, LIANG established NEAPUC.

- e. In or around February 2019, LIANG provided PRC OFFICIAL 1 with a list of members of Organization B, as well as information about local associations for Chinese families.
- f. In or around June 2018 and June or July 2019, LIANG organized photo exhibitions at the direction or control of the PRC government in the greater Boston area, telling PRC OFFICIAL 1 that an associate would be submitting the budget for the exhibitions to PRC OFFICIAL 1.
- g. On or about August 17-18, 2019, LIANG organized a counter-protest against anti-extradition, pro-democracy protesters in Boston.
- h. On or about August 19, 2019, LIANG provided a video of pro-democracy dissidents in Boston to PRC OFFICIAL 6.
- i. On or about September 2, 2019, LIANG provided photographs of pro-democracy dissidents in Boston to PRC OFFICIAL 1.
- j. In or around November and December 2019, LIANG provided PRC OFFICIAL 1 with information regarding the elections for Chairman of Organization A.
- k. In or around November 2021, LIANG provided PRC OFFICIAL 1 with information regarding the new elections for Chairman of Organization A.
- l. In or around April 2022, LIANG provided PRC OFFICIAL 1 with information regarding the candidates for the leadership of Organization E.
- m. In or around July 2022, LIANG provided PRC OFFICIAL 7 with the names and professional affiliations of two individuals in the Boston area who would be the best candidates for MPS to recruit and train.

COUNT ONE

Conspiracy to Act as Agent of a Foreign Government without Prior Notification
(18 U.S.C. § 371)

The Grand Jury charges:

38. The Grand Jury re-alleges and incorporates by reference the allegations in paragraphs 1 through 37 of this Indictment.

39. From at least in or around 2018 until at least 2022, in the District of Massachusetts and elsewhere, the defendant,

LITANG LIANG,

knowingly and intentionally conspired with others, known and unknown to the Grand Jury, to commit an offense against the United States, to wit, Acting as an Agent of a Foreign Government, that is, to knowingly act and cause others to act in the United States as an agent of a foreign government, namely, the People's Republic of China, without prior notification to the United States Attorney General, in violation of 18 U.S.C. § 951.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

Acting as an Agent of a Foreign Government Without Notice to the Attorney General
(18 U.S.C. § 951)

The Grand Jury charges:

40. The Grand Jury re-alleges and incorporates by reference the allegations in paragraphs 1 through 37 of this Indictment.

41. From at least in or around 2018 until at least 2022, in the District of Massachusetts and elsewhere, the defendant,

LITANG LIANG,

knowingly acted and caused others to act in the United States as an agent of a foreign government, namely, the People's Republic of China, without providing prior notification to the United States Attorney General, as required by law.

A TRUE BILL.



FOREPERSON



TIMOTHY H. KISTNER
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: MAY 4, 2023
Returned into the District Court by the Grand Jurors and filed.

 05/04/2023

DEPUTY CLERK

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency FBI

City Boston

Related Case Information:

County Suffolk

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number 22-5114, 22-5328, 22-5329
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Litang Liang Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name Henry Liang

Address (City & State)

Birth date (Yr only): 1959 SSN (last4#): 6142 Sex M Race: Asian Nationality: USA

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:

AUSA Timothy H. Kistner Bar Number if applicable 690534

Interpreter: Yes No List language and/or dialect: Mandarin

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status:

Arrest Date _____

Already in Federal Custody as of _____ in _____

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: _____ on _____

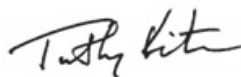
Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 05/04/2023

Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Litang Liang

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. 371</u>	<u>Conspiracy</u>	<u>1</u>
Set 2	<u>18 U.S.C. 951</u>	<u>Acting as an Agent of a Foreign Government Without Notice to the Attorney General</u>	<u>2</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____