

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

UNDER SEAL

v.

CRIMINAL COMPLAINT

LIANYU LI,
aka Xiangli Chen,
Jian Liu, Yinji Zhang,
Ying Ji Sun, Jin Zhang,
Xifang Zhang, Shun Zheng,
and Yinji Zhang

CASE NUMBER:

JIN HUA DONG,
aka Renyu Cui and
Zong Shu Liu,

MYUNG PAK,
aka Pak Lse Myung

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From on or about January 1, 2008 until on or about May 9, 2008, in the Northern District of Illinois, and elsewhere, defendants did

knowingly execute, or attempt to execute, a scheme or artifice to defraud a financial institution, or to obtain money or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises,

in violation of Title 18 United States Code, Section 1344. I further state that I am a Special Agent of the United States Secret Service and that this complaint is based on the following facts:

Please see attached affidavit.

Continued on the attached sheet and made a part hereof: x Yes No

Signature of Complainant

Sworn to before me and subscribed in my presence,

May 8, 2008 at _____
Date

Chicago, IL
City and State

Nan Nolan, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature Judicial Officer