

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

D-1 Yunqing JIAN and
D-2 Zunyong LIU

Case: 2:25-mj-30353
Assigned To : Unassigned
Case No. Assign. Date : 6/2/2025
Description: CMP USA V. SEALED
(DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 27, 2024 and February 5, 2025 in the county of Wayne and Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	Conspiracy to commit offense or to defraud the United States
18 U.S.C. § 545	Smuggling goods into the United States
18 U.S.C. § 1001	False statements
18 U.S.C. § 1546	Visa fraud

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: June 2, 2025

City and state: Detroit, Michigan



Complainant's signature

Special Agent Edward Nieh - FBI

Printed name and title



Judge's signature

Honorable Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN
APPLICATION FOR A CRIMINAL
COMPLAINT

I, Edward Nieh, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation. I have been employed in this capacity since March 2024 and am currently assigned to the Counterintelligence Division in the Detroit Field Office. The FBI's Counterintelligence Division is responsible for exposing, preventing, and investigating ongoing national security threats from foreign intelligence services and other intelligence activities within the United States.

2. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging Yunqing JIAN and Zunyong LIU with violations of Title 18, United State Code, Section 371 (Conspiracy to commit offense or to defraud the United States); Title 18, United State Code, Section 545 (Smuggling goods into the United States); Title 18, United State Code, Section 1001 (false statements); and Zunyong LIU with violating Title 18, United State Code, Section 1546 (visa fraud).

3. The facts contained in this affidavit come from my personal observations, my training and experience, my review of documents and statements, information obtained from other law enforcement officers and/or individuals with knowledge of this matter. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all my knowledge regarding this matter.

EXECUTIVE SUMMARY

1. Yunqing JIAN is a citizen of the People's Republic of China (PRC) who obtained her doctorate degree in plant pathogens from Zhejiang University in the PRC. After graduating, JIAN received money from a Chinese foundation (which is largely funded by the PRC government) to conduct post-doctoral work – which included research on a particular biological pathogen that can cause devastating diseases in crops.

2. Zunyong LIU, is also a citizen of the PRC and was JIAN's boyfriend. LIU works at Zhejiang University in the PRC and conducts research on the same biological pathogen as JIAN. On July 27, 2024, LIU unlawfully smuggled this biological pathogen into the United States at the Detroit Metropolitan Airport. When Customs and Border Protection (CBP) Officers questioned LIU, he made false statements to CBP Officers about the purpose of his visit to the United States, and his knowledge of the existence of the biological pathogen in his possession.

Ultimately, LIU admitted to smuggling the pathogen and stated that he brought the pathogen into the United States so that he could conduct research on it at a laboratory at the University of Michigan where his girlfriend, JIAN, worked.

3. After LIU's smuggling of the biological pathogen, FBI Agents interviewed JIAN who falsely claimed that she knew nothing about LIU's smuggling or his intent to conduct research on the pathogen at the laboratory during his visit. In fact, an examination of electronic communications between LIU and JIAN shows that the two discussed the shipping of biological materials and research being done in the laboratory prior to LIU's arrival. Electronic evidence also shows that JIAN has been involved in smuggling packages of biological material into the United States on prior occasions.

PROBABLE CAUSE

Background Information on Fusarium graminearum

4. Fusarium is a large genus of fungi. Many strains of Fusarium are harmless; however, some species can produce mycotoxins in plants that affect crop, human, and animal health. According to an article from the journal *Molecular Plant Pathology*, entitled "Heading for disaster: Fusarium graminearum on cereal crops," Fusarium graminearum is a strain of this plant pathogen which causes "head blight," a devastating disease on wheat, barley, maize, and rice.

5. *Fusarium graminearum* is responsible for billions of dollars in economic losses worldwide each year. The toxins produced by *Fusarium graminearum* cause vomiting, liver damage, and reproductive defects in livestock and humans. According to an article published in the journal *Food Security*, *Fusarium graminearum* is classified as a potential agroterrorism weapon that could be used for targeting food crops.

Background on USDA Permit Process

6. Pursuant to the Plant Protection Act, 7 U.S.C. §§ 7701 – 7784, and the Federal Plant Pest Regulations, 7 C.F.R. §§ 330.100 – 330.207, the United States Department of Agriculture (USDA) regulates the importation of organisms which may negatively impact agriculture in the United States. These laws prohibit any person from importing into the United States any organism that “directly or indirectly injures, causes damage to, or causes disease in a plant or plant product” without first applying for and obtaining a permit from the USDA. 7 C.F.R. § 330.200. An individual who seeks to import such an organism from outside the United States “must be 18 years of age or older and have a physical address within the United States.” *Id.* at § 201. In addition, the permit applicant must inform the USDA of the site and facility where the organism will be stored so that the USDA can determine in advance whether the facility is “constructed and maintained in a manner that prevents the dissemination or dispersal” of the organism. *Id.* On the

USDA website, there is a search option to validate if an organism requires a permit.¹ A search of *Fusarium graminearum* reveals that the USDA requires a permit for the importation of *Fusarium graminearum*. According to records maintained by the USDA, Yunqing JIAN and Zunyong LIU have never applied for, nor have they been issued, a permit to import *Fusarium graminearum* into the United States.

Background on Yunqing JIAN

7. Yunqing JIAN is a citizen of the PRC. According to a resume submitted by JIAN as part of her United States visa application, JIAN received her postdoctoral degree from Zhejiang University in the PRC in 2020, where she studied “plant-pathogen interactions,” among other things. Following the completion of her postdoctoral degree, JIAN became a postdoctoral scholar at Zhejiang University in July 2022. Over the course of her research, JIAN has been a co-author for articles researching *Fusarium graminearum*.

8. JIAN was in a romantic relationship with Zunyong LIU, who is also a citizen of the PRC. As described in more detail below, FBI Agents executed a federal search warrant on several electronic devices belonging to LIU. FBI Agents

¹ <https://efile.aphis.usda.gov/s/brs-permitting-assistant>

found documentation of JIAN's postdoctoral position at Zhejiang University in a compressed folder in the device storage on LIU's phone. Broadly, the documents described JIAN's completion of her postdoctoral position at Zhejiang University. One of the documents contained a 70-page technical report detailing JIAN's research accomplishments on the study of *Fusarium graminearum*. Another document showed that the completion date of JIAN's position at Zhejiang University was June 30, 2024.

9. These documents further stated that JIAN received funding for her postdoctoral position in the PRC. For example, these documents state that, from July 1, 2022, to June 30, 2024, JIAN received funding from the PRC Postdoctoral International Exchange Program and the Second Class of Grants from the 69th Batch of China Postdoctoral Science Foundation for approximately 180,000 Chinese Yuan annually (approximately \$25,000 USD). According to its website, the China Postdoctoral Science Foundation is mainly funded by the government and has an "effectively coordinated administration system led by the government...." The purpose of the fund is to promote the "rapid growth" of "high-level researchers" in the PRC.

10. On or about June 21, 2022, JIAN applied for a J1 visa to the United States Department of State. As part of her visa application, JIAN submitted a research plan indicating that she intended to study topics distinct and different

from the study of *Fusarium graminearum*. The J1 visa allowed JIAN to enter the United States to conduct research as a postdoctoral scholar at a laboratory at a university in Texas. From August 2022 to August 2023, JIAN was a postdoctoral fellow at this university.

11. In 2023, the University of Michigan offered JIAN a position as a postdoctoral research fellow at the Molecular Plant-Microbe Interaction (MPMI) Laboratory at the University of Michigan in Ann Arbor, Michigan. JIAN's employment at the University of Michigan began on or about August of 2023 and continues to the present.

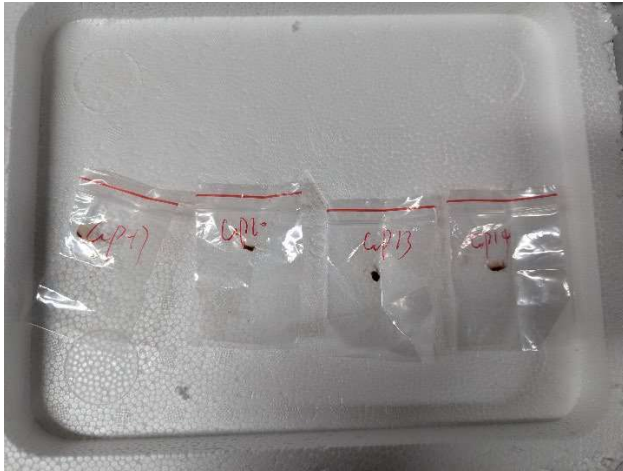
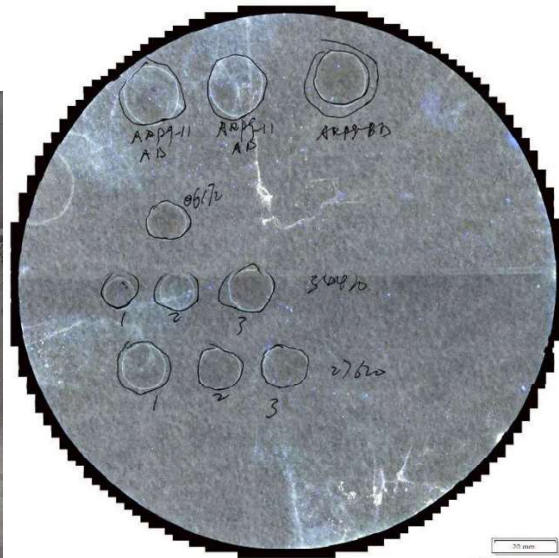
LIU's Smuggling of *Fusarium Graminearum* into the United States

12. In March of 2024, LIU submitted an application for a B2 tourist visa for entry into the United States. On the visa application, LIU was asked: "Do you seek to engage in espionage, sabotage, export control violations, or any other illegal activity while in the United States?" LIU answered "NO." LIU's tourist visa was approved. A tourist visa does not permit a foreign national to perform work or scientific research during their visit to the United States. Nor does a tourist visa allow a foreign national to import a biological pathogen into the United States.

13. On July 27, 2024, LIU arrived at the McNamara Terminal of the Detroit Metropolitan Airport on board Delta Flight 388 from Shanghai, PRC. LIU was inspected and interviewed by CBP Officers upon his arrival.

14. CBP created a “Record of Sworn Statement in Proceedings” to document LIU’s interview. Prior to the interview, a CBP Officer advised LIU that “[i]t is very important that you tell me the truth. If you lie or give misinformation, you may be subject to criminal or civil penalties....” LIU confirmed that he understood the CBP Officer, that he was willing to answer questions, and that he was able to give statements in English without an interpreter. LIU stated that he did not have any pending or approved petitions that would allow him to work, study, or reside in the United States. When asked about the purpose of his travel, LIU stated that he was entering the United States to visit his girlfriend, Yunqing JIAN, a postdoctoral scholar at the University of Michigan – Ann Arbor. LIU stated that he would be visiting JIAN for approximately one month and then returning to work at Zhejiang University to start his own laboratory. LIU further stated that he had no work materials with him.

15. CBP Officers conducted an examination of LIU’s baggage in Agriculture Secondary. The exam revealed a wad of tissues crumpled up in a small pocket in LIU’s backpack. The tissues concealed a note in Chinese, a round piece of filter paper with a series of circles drawn on it, and four clear plastic baggies with small clumps of reddish plant material inside. *See Figure 1 and 2.*

Figure 1*Figure 2*

16. LIU initially stated that he did not know what the materials were and that someone must have put them into his bag. When asked why someone would put those materials into his bag, LIU stated that he did not know, and that maybe he had accidentally put the materials there. After further questioning, LIU acknowledged that the materials were different strains of the pathogen *Fusarium graminearum*.

17. LIU stated that he planned to clone the different strains of *Fusarium graminearum* contained on the filter paper and make more samples if the experiments on the reddish plant material failed. LIU stated that he intentionally hid the samples in his backpack because he knew there were restrictions on the importation of the materials. LIU confirmed that he had intentionally put the samples in a wad of tissues so CBP Officers would be less likely to find and confiscate them, and he could continue his research in the United States.

18. LIU stated that he intended to use the MPMI Laboratory at the University of Michigan to conduct research using the biological materials found in his backpack. LIU confirmed that this was the same laboratory where his girlfriend, JIAN, also conducts research on the genus *Fusarium*. LIU stated that, while he was in the United States, he would have free access to the laboratory at the University of Michigan on some days, and that other days his girlfriend would give him access to the laboratory to conduct his research.

19. LIU initially denied knowing anyone else at the MPMI Laboratory, but subsequently stated that he knew the two principal investigators overseeing the MPMI Laboratory. LIU noted that he knew the two principal investigators because he conducted research with them at the university in Texas and the University of Michigan in the past. Open-source research revealed that LIU worked as a postdoctoral fellow for the same two principal investigators at the university in Texas from May 2018 to August 2023 and at the MPMI Laboratory at the University of Michigan from August 2023 to April 2024. LIU worked in the same laboratories as JIAN at the university in Texas and the University of Michigan from August 2022 until April 2024. LIU has also co-authored several academic articles with JIAN and the two principal investigators from the MPMI Laboratory. At least nine articles identified LIU as a co-author with one or more of these individuals. Of these

identified articles, LIU co-authored at least four articles regarding *Fusarium oxysporum* and *Fusarium graminearum*.

20. CPB Officers inspected two Apple iPhones and a MacBook computer that were in LIU's possession. CBP Officers saw that LIU sent JIAN a message stating that a shipment of peptides was set to be delivered before his arrival in the United States. Based on my training and experience, I know that peptides are amino acid strings that are commonly used for academic research. CBP records confirm that a package from the PRC sent from LIU to JIAN arrived in Ann Arbor, Michigan, on July 19, 2024.

21. Additionally, CBP Officers saw that one of LIU's Apple iPhones contained an article titled "2018 Plant-Pathogen Warfare under Changing Climate Conditions.pdf" in the WhatsApp application. Open-source research revealed that this article references *Fusarium graminearum* as an example of a destructive disease and pathogen for crops.

22. CBP officers seized and detained LIU's electronic devices, determined that LIU was inadmissible to the United States, denied him entry and processed him for expedited removal back to the PRC.

23. An FBI laboratory performed testing on the biological materials that LIU smuggled into the United States. Laboratory testing revealed that the filter paper contained *Fusarium graminearum*, and the baggies of material contained fibrous

material that was infected with *Fusarium graminearum*. In addition, the laboratory identified 10 separate samples from the filter paper. Each sample had a hand drawn circle around it, and each circle was labeled with a code containing letters and/or numbers. The sample labeled “06172” was identified by the FBI laboratory to contain the DNA sequence for *Fusarium graminearum*. Based on my discussions with FBI Laboratory personnel, the sample labeled “06172,” would allow a researcher to propagate live *Fusarium graminearum*.

Search Warrant Execution of LIU’s Electronic Devices

24. FBI Agents obtained and executed a federal search warrant for the electronically stored information contained in LIU’s electronic devices. FBI Agents found WeChat messages between LIU and JIAN in the months and days prior to LIU’s smuggling of *Fusarium graminearum* on July 27, 2024. WeChat is a Chinese instant messaging, social media, and mobile payment app developed by Tencent – a Chinese multinational technology conglomerate and holding company headquartered in Shenzhen, PRC.

25. As mentioned previously, JIAN and LIU worked together at the MPMI Laboratory until April 2024. According to CBP travel records, LIU left the United States and returned to the PRC on April 30, 2024. On or around May 1, 2024, JIAN and LIU had the following conversation through WeChat about one of

the principal investigators of the MPMI Laboratory finding one of LIU's biological samples. These messages were machine translated and condensed.

JIAN: I just went down to help with your plants. Fortunately, I went.

LIU: Did the boss and her team inspect it?

JIAN: Met them on patrol. Yes.

LIU: All right. That's such a coincidence.

JIAN: Your cell death phenotype plants were seen by [the principal investigator].

LIU: What did you say?

JIAN: She asked me what it was. I said it was Zunyong's leftover plant... She said it has a strong phenotype. Your label clearly states your name.

LIU: What should I do then?... She didn't say anything else, did she?... I usually put it on the top shelf... I forgot this time and put it below.

JIAN: She asked me what this phenotype was... I said it should be effector... There's nothing I can do... It really pushed me to the brink of despair. She said what is the effector.

LIU: Was she angry?

JIAN: I said it was Fusarium. No... She also asked me if you had detected it before. She thought it was Fo's... I didn't dare tell her it was Fg... Fortunately I didn't say it was Fg. That's even more serious.

26. Based on my training and experience, I believe “Fg” refers to *Fusarium graminearum* and “Fo” refers to *Fusarium oxysporum*. The MPMI Laboratory has permits from the USDA to study *Fusarium oxysporum* but not *Fusarium graminearum*.

27. On or about July 8, 2024 – approximately three weeks before LIU smuggled *Fusarium graminearum* into the United States – LIU and JIAN exchanged WeChat messages in which LIU told JIAN, “I’ll go get the seeds as soon as possible.” JIAN replied, “I’m already able to receive them.” On July 9, 2024, JIAN and LIU appeared to have an argument and had the following WeChat exchange:

JIAN: If you are busy, don’t come. Find someone else to receive the seeds for you.

LIU: If you want to receive the seeds you can, if you don’t then throw them away.

JIAN: Then find someone else to throw it away for you, I’m not obligated to throw it away for you.

28. On July 20, 2024 – approximately one week before LIU smuggled *Fusarium graminearum* into the United States – LIU sent JIAN a long message discussing “*Fusarium graminearum* (Fg) inoculation in wheat.” On July 27, 2024, JIAN and LIU had the following WeChat exchange:

JIAN: It’s a pity that I still have to work for you

LIU: Once this is done, everything else will be easy

JIAN: My seedlings are not usable yet

LIU: It's okay

JIAN: A batch just passed. The new one is not good yet

LIU: First let's test the expression. Are centrifuges easy to use now?

JIAN: Not as useful as before. But it can be used. The expression I mentioned this time is okay.

LIU: DNA proposed is not as useful as before?

JIAN: Well enough. But the quantity is not that big.

LIU: Maybe the centrifuge is not working well.

JIAN: Maybe you can do the same as before.

LIU: That's not necessarily true... Did you receive the peptides? The courier showed that it had been delivered on Thursday.

29. In addition, FBI Agents found WeChat messages between LIU and JIAN which indicate that JIAN smuggled biological material into the United States on a prior occasion. On or around August 12, 2022, LIU and JIAN sent WeChat messages discussing the smuggling of seeds into the United States. The messages were machine translated and read as follows:

LIU: You need to pick up your luggage when you go through customs.

JIAN: That is to say, in San Francisco.

LIU: Yes.

JIAN: And then go through security again?

LIU: So be careful.

JIAN: OK.

LIU: Teacher Liang's seeds must be placed well.

JIAN: Where to put it? I only have one pair of shoes. The insole cannot be pulled off.

LIU: Did you bring just one pair of shoes?

JIAN: 3 pair, wear one pair.

LIU: Where did the seeds get put? In the tube?

JIAN: I put them in my Martin boots... in a small bag. The ziplock bag. Very small.

LIU: That's good... Just put it in your shoes.

JIAN: I stuffed them in the shoes.

30. According to CBP travel records, on August 13, 2022, the day after the above conversation took place, JIAN arrived in the United States from Seoul, South Korea, on United Airlines flight 858, at San Francisco International Airport. A review of records regarding JIAN's entry into the United States on August 13, 2022, did not show that JIAN declared the importation of any biological materials.

JIAN Makes False Statements to FBI Agents

31. On February 5, 2025, FBI Special Agents interviewed JIAN at the MPMI Laboratory. During the interview, JIAN identified herself as LIU's girlfriend. When asked about the purpose of LIU's travel to the United States in July of 2024, JIAN stated that LIU was traveling to visit her for summer vacation. JIAN stated that LIU is a faculty member at Zhejiang University and studies *Fusarium graminearum*. JIAN denied knowing that LIU was planning to study in the United States or bring samples of biological materials into the United States. JIAN claimed to have first learned about the smuggling after LIU was caught by CBP. JIAN repeated that she was "100 percent sure . . . I didn't know anything about it until this thing happened." JIAN also denied knowing what type of samples LIU was bringing to the United States and denied assisting LIU's research on *Fusarium graminearum*.

32. Agents questioned why LIU would bring *Fusarium graminearum* to the United States and if he had brought the samples over to JIAN, leading to the following exchange:

JIAN: "I don't study on *Fusarium*. How would this happen? Send me this for what?"

Agents: "I don't know, that's what we're trying to figure out... Was there *Fusarium graminearum* in the lab?"

JIAN: "I don't think so. I don't think so. We don't study on this here."

Agents: “So, that’s not going to be anywhere in the lab?”

JIAN: “Yes, I don’t think there’s going to be any F... graminearum.”

Agents: “Are you sure?”

JIAN: “From my understanding and knowledge, I don’t think we have it. But... from my information, there is none.”

Agents: “I’m going to ask you point blank, and I need you to be honest. Are you assisting his research on Fusarium graminearum in this lab?”

JIAN: “No.”

Agents: “Have you ever done that?”

JIAN: “In China, we did that.”

Agents: “In this lab, here?”

JIAN: “Fusarium graminearum, no. Fusarium graminearum, 100% no.”

33. During the interview, agents observed that JIAN was in possession of a cellular telephone. At the end of the interview, an FBI Agent asked JIAN to provide her cellular telephone. JIAN did not provide the cellular telephone and instead began manipulating the cellular telephone, at which point Agents seized it from her possession pursuant to a federal search warrant. Law enforcement performed a digital forensic analysis on JIAN’s cellular telephone and discovered that one WhatsApp conversation had been recently deleted. Additionally, WeChat

conversation history between LIU and JIAN that overlapped in time with LIU's July 2024 smuggling at the Detroit Metropolitan Airport were unable to be located forensically on JIAN's phone. Based on my training and experience, this can happen if messages are deleted and the cache wiped.

JIAN's Pledge to Support the Chinese Communist Party

34. FBI Agents conducted a search of JIAN's cellular telephone pursuant to the federal search warrant. That search revealed an electronic document written in the Chinese language and subsequently machine translated. The file was named "2023 Jian Yunqing Personal Summary Form – Signature" and the document was titled "2023 Zhejiang University Faculty and Staff Annual Work Assessment Form." The form was an annual self-assessment by JIAN describing her membership and loyalty to the Chinese Communist Party and detailing her research accomplishment from the previous year as a postdoctoral scholar for Zhejiang University. Specifically, the document contained the following statement:

I adhere to the four basic principles, support the leadership of the Communist Party of China, resolutely implement the party's educational guidelines and policies, love education, care for students, unite colleagues, love the motherland, and care about national affairs. In my daily work and life, I conscientiously do a good job as an international student, conscientiously implement the rules and regulations of the school, and always remind myself to maintain the image of a Chinese person and not smear the motherland.

The document was signed by JIAN and dated January 11, 2024.

35. I know from my training and experience that the “four basic principles” are central ideologies of the Chinese Communist Party. These four principles are: (1) upholding the socialist path, (2) upholding the people’s democratic dictatorship, (3) upholding the leadership of the Chinese Communist Party, and (4) upholding Mao Zedong thought and Marxism-Leninism.

JIAN’s Prior Smuggling Efforts

36. The search of JIAN’s cellular telephone also revealed a conversation on WeChat between JIAN and an individual named Xia Chen on or around January 15, 2024. Machine translation and preliminary audio translation were performed on the text and audio-based messages, respectively. The messages revealed a request from JIAN to Chen requesting that Chen send JIAN some plasmids. Specifically, JIAN requested “06172-pyf11-GFP” flag. As described above, a sample with the label “06172” was on the filter paper that LIU smuggled into the United States on July 27, 2024. This sample with label “06172” was tested by the FBI Laboratory and contained the full DNA sequence of *Fusarium graminearum*. In my training and experience, laboratories use internal labeling to distinguish and classify scientific samples of similar materials accordingly. Therefore, I believe that JIAN was talking to Chen about *Fusarium graminearum*.

37. JIAN asked Chen to mail her some plasmids. Chen agreed to JIAN’s request, stating, “OK, I’ll send it to you.” JIAN gave detailed instructions through

text and audio messages to Chen on the preparation and concealment of the materials. Specifically, JIAN gave Chen a description of the materials she was requesting and an associated photograph. JIAN instructed Chen on how she should prepare the materials, including the steps required to prepare the filter paper – such as drawing circles on the paper, numbering it, and telling JIAN what the numbers were for her reference. JIAN went on to say that if there were issues, she would be able to cut out sections of the filter paper and redo the process herself. JIAN provided her current home address in Ann Arbor, Michigan, as the mailing address for the package and a phone number that matched the cellular telephone phone number of the device seized from JIAN pursuant to the search warrant on February 5, 2025.

38. After providing a mailing address, JIAN instructed Chen to cut the filter paper into smaller pieces, place the pieces into a small Ziplock bag, and slide the bag into a book, preferably a thicker book, to send over. Chen asked JIAN if the book would be inspected, and JIAN replied, “There are usually no problems. Rest assured. I have mailed these before.”

39. On or around January 19, 2024, Chen reported to JIAN that the package had been sent out. Chen sent a picture of the concealed filter paper and a corresponding text message stating that this was how “it” looked inside the book. *See Figure 3.*

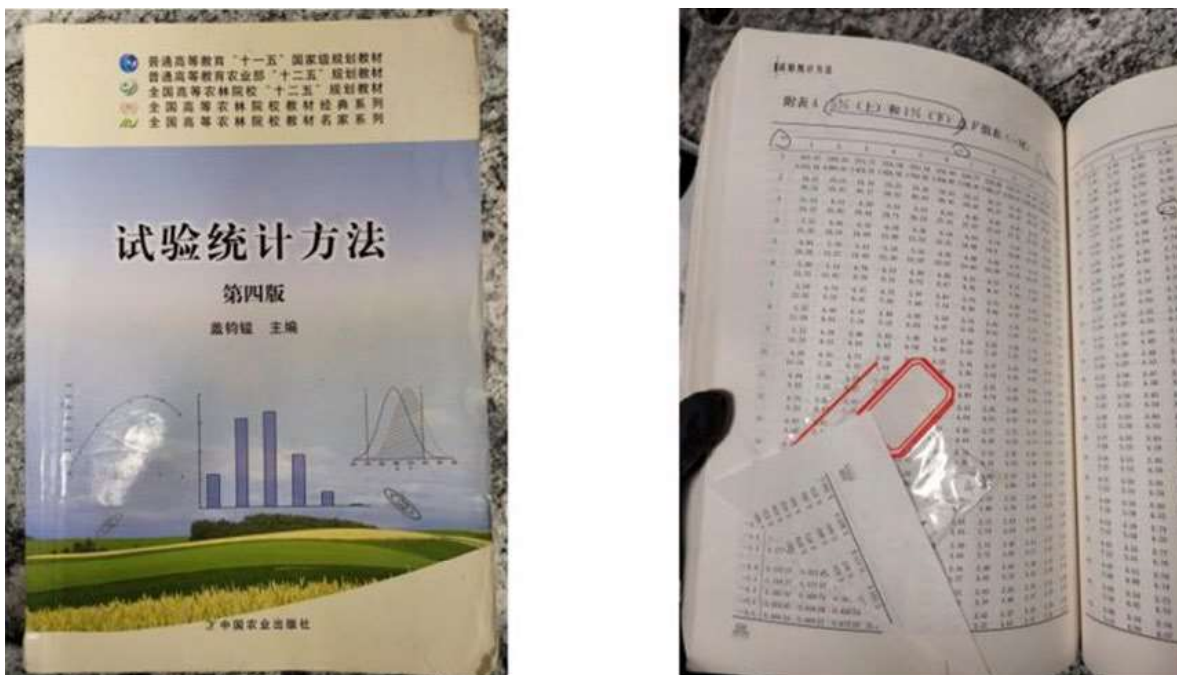
Figure 3



40. On January 22, 2024, CBP Biological Threat Operations Specialists (BTOS) in Louisville, Kentucky, inspected a shipment manifested as “Doc” from Xia Chen of Zhejiang University in the PRC destined to JIAN at her home address in Ann Arbor, Michigan. Upon inspection, BTOS observed a used statistics textbook with fifteen circles of filter paper containing unknown substances.

41. Louisville BTOS took photographs of the same package that was seized for containing biologicals. *See* Figure 4. The sample was subsequently destroyed.

Figure 4



42. On or around February 9, 2024, JIAN messaged Chen that the package was lost during delivery. Chen revealed that the package contained a “Biostatistics book, off-white, 260x185mm.” Based on the timeline of the messages between JIAN and Chen, the similarity of the photographs in Figure 3 and 4, and the date that the shipment was confiscated, I have reason to believe that the package seized by CBP was the same package that JIAN had directed Chen to send to her from the PRC to the United States.

CONCLUSION

43. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that Yunqing JIAN and Zunyong LIU have

committed violations of Title 18, United State Code, Section 371 (Conspiracy to commit offense or to defraud the United States); Title 18, United State Code, Section 545 (Smuggling goods into the United States); Title 18, United State Code, Section 1001 (false statements); and that Zunyong LIU has also committed a violation of Title 18, United State Code, Section 1546 (visa fraud). Therefore, I respectfully request that the Court issue a criminal complaint and corresponding arrest warrants for Yunqing JIAN and Zunyong LIU.

Respectfully submitted,



Edward Nieh, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: June 2, 2025