

NJM:AAS/ANR/MS
F. #2022R00805

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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FILED
IN CLERK'S OFFICE
US DISTRICT COURT
E.D.N.Y.
* MARCH 25, 2026 *
BROOKLYN OFFICE

UNITED STATES OF AMERICA

SUPERSEDING
INDICTMENT

- against -

LU JIANWANG (卢建旺),
also known as "Harry Lu,"

Cr. No. 23-CR-316 (S-1) (NRM)
(T. 18, U.S.C., §§ 371, 951(a),
981(a)(1)(C), 1512(c)(1), 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

Defendant.

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Act as an Agent of a Foreign Government)

1. In or about and between January 2022 and October 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LU JIANWANG (卢建旺), also known as "Harry Lu," together with others, did knowingly and willfully conspire to act in the United States as an agent of a foreign government, to wit: the government of the People's Republic of China ("PRC"), without prior notification to the Attorney General of the United States, as required by law, contrary to Title 18, United States Code, Section 951(a).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant LU JIANWANG, also known as "Harry Lu," together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about January 10, 2022, LU attended a ceremony in Fuzhou, PRC, at which the PRC government officially launched an initiative with the goal of establishing overseas police service stations worldwide.

(b) On or about and between January 20, 2022 and January 22, 2022, LU attended the Fifth Session of the 12th Fujian Provincial People's Political Consultative Conference and the Sixth Session of the 13th Fujian Provincial People's Congress in the PRC.

(c) On or about January 28, 2022, LU invited a co-conspirator ("CC-1"), an individual whose identity is known to the Grand Jury, to a WeChat group titled "First Batch of Overseas Service Centers."

(d) On or about February 13, 2022, LU returned to the United States from the PRC, arriving at John F. Kennedy International Airport in Queens, New York.

(e) On or about February 15, 2022, LU and CC-1 helped to establish an overseas police service station for the PRC government in Manhattan, New York (the "Overseas Police Service Station").

(f) On or about March 24, 2022, LU received an electronic communication from his contact at the PRC's Ministry of Public Security ("MPS Official-1"), an individual whose identity is known to the Grand Jury, directing him to confirm the location of a PRC dissident and PRC pro-democracy advocate residing in California ("Victim-1"), an individual whose identity is known to the Grand Jury.

(g) On or about March 26, 2022, LU sent an electronic communication to a co-conspirator ("CC-2"), an individual whose identity is known to the Grand Jury, asking CC-2 to help determine the location of Victim-1.

(h) On or about April 21, 2022, LU and others hosted principals from the PRC Consulate of New York at the Overseas Police Service Station.

(i) On or about September 24, 2022, MPS Official-1 tasked CC-1 with removing an online article on FJSEN.com regarding the PRC government's operation of the Overseas Police Service Station.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO

(Acting as an Agent of a Foreign Government)

3. In or about and between January 2022 and October 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LU JIANWANG (卢建旺), also known as "Harry Lu," together with others, did knowingly act in the United States as an agent of a foreign government, to wit: the government of the PRC, without prior notification to the Attorney General of the United States, as required by law.

(Title 18, United States Code, Sections 951(a), 2 and 3551 et seq.)

COUNT THREE

(Obstruction of Justice)

4. In or about October 2022, within the Eastern District of New York and elsewhere, the defendant LU JIANWANG (卢建旺), also known as "Harry Lu," together with others, did knowingly, intentionally and corruptly alter, destroy, mutilate and conceal a record, document and other object, to wit: one or more electronic messages between LU and one or more representatives of the PRC Ministry of Public Security, with the intent to impair the object's integrity and availability for use in an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York.

(Title 18, United States Code, Sections 1512(c)(1), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE

5. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Three, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

6. 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 party;
- (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 divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

/s/

FOREPERSON

by Alifandra Smith, Assistant United States Attorney

JOSEPH NOCELLA, JR.
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK