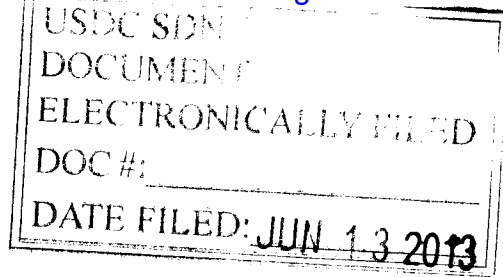


**JUDGE FORREST**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



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UNITED STATES OF AMERICA :  
 :  
-v.- :  
 :  
QIANG WANG, :  
a/k/a "Jeffrey Wang," :  
 :  
Defendant. :  
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INFORMATION

13 Cr.

**13 CRIM 452**

COUNT ONE  
(Conspiracy)

The United States Attorney charges:

The Defendant and Co-Conspirators

1. At all times relevant to this Information, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, operated an antiques business out of his apartment in Flushing, New York, among other locations, and did business as Bao Qing Lou Gallery, Inc., a corporation registered with the State of New York. WANG represented himself to be an expert in antiques, including the trade of objects made from rhinoceros horn and elephant ivory.

2. At all times relevant to this Information, CC-1 and CC-2, co-conspirators not named as defendants herein, were Chinese nationals residing in China who were involved in the business of purchasing Asian art and antiques in the United States, including objects made from rhinoceros horn and elephant ivory, for customers in China, and arranging for those items to

be smuggled out of the United States and into Hong Kong and China, with the assistance of QIANG WANG, a/k/a "Jeffrey Wang," the defendant, and others.

**Background on Regulation of Trade in Endangered Species**

3. Trade in rhinoceros horn and elephant ivory has been regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora ("CITES") since 1976. CITES is a international treaty providing protection to fish, wildlife and plants that are or may become imperiled due to the demands of international markets. CITES has been signed by over 170 countries including the United States and China. CITES is implemented in the United States under the authority of the Endangered Species Act and the regulations promulgated thereunder. 16 U.S.C. § 1538(c); 50 C.F.R. §§ 14 and 23. An animal species listed as protected within CITES cannot be exported from the United States without prior notification to, and approval from, the U.S. Fish & Wildlife Service. 50 C.F.R. §§ 20.13 and 20.20. Species protected under CITES are listed in a series of appendices (Appendices I, II and III). Under Appendix II of CITES, a species may be exported from the United States to a foreign country only if, prior to exportation, the exporter possesses a valid CITES export permit issued by the United States. Under Appendix I of CITES, a species may be exported from the United States to a foreign country only if,

prior to exportation, the exporter possesses a valid foreign import permit issued by the country of import and a valid export permit issued by the United States. All rhinoceros and elephant species are protected under either CITES Appendix I or II.

4. Rhinoceros are characterized by their enormous size, leathery skin and horns. Rhinoceros horn is a highly valued and sought after commodity despite the fact that international trade has been largely banned and highly regulated since 1976. Libation cups and other ornamental carvings are particularly sought after in China and other Asian countries as well as in the United States. The escalating value of these items has resulted in an increased demand for rhinoceros horn and helped to foster a thriving black market, including modern carvings being sold as antiques. Most species of rhinoceros are extinct or on the brink of extinction as a result of this thriving black market.

5. Elephant ivory and carved art objects made from such ivory are also highly valued and sought after commodities despite the fact that international trade has been largely banned and highly regulated since 1976. The demand for antiques and art made of or containing elephant ivory has also resulted in a thriving black market, including modern carvings being sold as antiques. Elephants are threatened in many countries as a result of this thriving black market.

**Overview of the Conspiracy**

6. From at least in or about March 2011, up to and including in or about February 2013, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, worked with CC-1 and CC-2 to smuggle objects containing rhinoceros horn and elephant ivory out of the United States and into Hong Kong and China for customers of CC-1 and CC-2, knowing that the exportation of such items was prohibited by law.

**Means and Methods of the Conspiracy**

7. In furtherance of the conspiracy and to effect the illegal objects thereof, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, visited auction galleries and auction houses in New York City, New York, and elsewhere, in order to locate, purchase, transport and receive objects made from and containing rhinoceros horn and elephant ivory on behalf of CC-1 and CC-2.

8. In furtherance of the conspiracy and to effect the illegal objects thereof, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, received money from various accounts in China, as arranged by CC-1 and CC-2, in order to purchase, obtain, receive and transport objects made from and containing rhinoceros horn and elephant ivory.

9. In furtherance of the conspiracy and to effect the illegal objects thereof, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, smuggled and exported objects made from and containing

rhinoceros horn and elephant ivory from the United States to Hong Kong and China using the United States Postal Service and other privately owned express mail services.

10. In furtherance of the conspiracy and to effect the illegal objects thereof, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, addressed and mailed packages containing objects made from and containing rhinoceros horn and elephant ivory to at least one location in China and an address in Hong Kong provided by CC-2.

11. In furtherance of the conspiracy and to effect the illegal objects thereof, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, made and used false United States Customs Declarations for packages containing objects made from and containing rhinoceros horn and elephant ivory in order to conceal the true contents of the packages.

12. In furtherance of the conspiracy and to effect the illegal objects thereof, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, and CC-1 and CC-2, did not declare to the U.S. Fish and Wildlife Service or U.S. Customs and Border Protection, as required by law, that wildlife was being exported from the United States to Hong Kong and China.

#### **Statutory Allegations**

13. From at least in or about January 2011, up to and including in or about February 2013, in the Southern District of

New York and elsewhere, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, together with others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate the laws of the United States, to wit, Section 554 of Title 18, United States Code, Sections 1538(c), 1540(b), 3372(d) and 3373(d)(3)(A) of Title 16, United States Code, and Sections 14.63 and 23.13 of Title 50, Code of Federal Regulations.

14. It was a part and an object of the conspiracy that QIANG WANG, a/k/a "Jeffrey Wang," the defendant, together with others known and unknown, fraudulently and knowingly exported and sent from the United States CITES-protected merchandise made from and containing rhinoceros horn and elephant ivory, contrary to United States law, and received, concealed, bought, sold, and facilitated the transportation, concealment and sale of such merchandise, prior to exportation, knowing the same to be intended for exportation contrary to United States law, in violation of Title 18, United States Code, Section 554.

15. It was a further part and an object of the conspiracy that QIANG WANG, a/k/a "Jeffrey Wang," the defendant, together with others known and unknown, knowingly exported objects made from and containing rhinoceros horn and elephant ivory without prior declaration to, and approval from, the U.S. Fish & Wildlife Service and without a valid CITES export permit

issued by the United States, in violation of Title 16, United States Code, Sections 1538(c) and 1540(b) and Title 50, Code of Federal Regulations, Sections 14.63 and 23.13.

16. It was a further part and an object of the conspiracy that QIANG WANG, a/k/a "Jeffrey Wang," the defendant, together with others known and unknown, knowingly made a false record, account, and label for, and false identification of, wildlife, including objects made from and containing rhinoceros horn and elephant ivory, that had been and was intended to be, transported in foreign commerce, in violation of Title 16, United States Code, Sections 3372(d) and 3373(d)(3)(A).

**Overt Acts**

17. In furtherance of the conspiracy, and to effect the illegal objects thereof, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about January 20, 2011, WANG opened a bank account in New York ("Bank Account-1") in the name of Bao Qing Lou Gallery, Inc. that he used to receive wire transfers from various bank accounts in China.

b. On or about September 14, 2011, WANG bid on and was the winning bidder of three rhinoceros horn libation cups at an auction held at a New York auction house in New York, New York (the "Auction"), for a total sales price of \$1,159,500.

c. On or about November 8, 2011, WANG received, in Bank Account-1, a wire transfer of approximately \$500,000 from a bank in China.

d. On or about November 10, 2011, WANG used a \$357,000 check, drawn on Bank Account-1, to make a partial payment towards the rhinoceros horn libation cups he had purchased at the Auction.

e. On or about June 14, 2012, WANG used a \$150,000 check, drawn on Bank Account-1, to make another payment towards the rhinoceros horn libation cups he had purchased at the Auction.

f. On or about June 25, 2012, WANG picked up, in New York, New York, two of the rhinoceros horn libation cups purchased at the Auction.

g. On or about December 1, 2012, WANG delivered to another individual five elephant ivory carvings for the purpose of packing them and mailing them to Hong Kong.

(Title 18, United States Code, Sections 371 and 2.)

**COUNT TWO**  
(Smuggling)

The United States Attorney further charges:

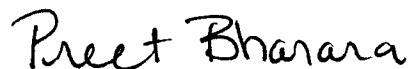
18. The allegations set forth in paragraphs 1 through 17 are repeated and realleged as if set forth fully herein.

19. From at least in or about January 2011, up to and including in or about February 2013, in the Southern District of



New York and elsewhere, QIANG WANG, a/k/a "Jeffrey Wang," the defendant, did fraudulently and knowingly export and send, and attempt to export and send, from the United States, merchandise, articles and objects contrary to United States law and regulations, and did fraudulently and knowingly receive, conceal and buy, and facilitate the transportation and concealment of, such merchandise, articles and objects, prior to exportation, knowing the same to be intended for exportation contrary to United States law and regulations, to wit, WANG purchased and received from auction houses in Manhattan, New York, among other locations, articles and objects containing rhinoceros horn and elephant ivory, knowing they were intended to be exported contrary to United States law, and thereafter concealed and exported and attempted to export such articles and objects, knowing that the export of such articles and objects was contrary to law, specifically Title 16, United States Code, Sections 1538(c), 1540(d), 3372(d)(1) and 3373(d)(3)(A).

(Title 18, United States Code, Sections 554 and 2.)



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PREET BHARARA  
United States Attorney

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

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v-

QIANG WANG,  
a/k/a "Jeffrey Wang,"

Defendant.

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**INFORMATION**

13 Cr.

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PREET BHARARA  
United States Attorney

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 Janis Echenberg  
Assistant United States Attorney  
(212) 637-2597

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6/14/2013 - Arraignment  
Time in court :30  
Defendant present with atty David Colgan. AUSA Janis Echenberg present. Court Reporter present. Mandarin Interpreter present. Waiver of Indictment signed. Defendant Arraigned and enters a plea of Not Guilty to the Information. Further Status conference scheduled for 8/14/2013, at 1:00 p.m. upon application of the Government, and consented to by defendant, Time Pursuant to the Speedy Trial Act is hereby excluded Between 6/14/2013 and 8/14/2013 in the Interests of Justice. Bail conditions remain in place.