

FILED IN OPEN COURT

UNITED STATES DISTRICT COURT JACKSONVILLE, FLORIDA
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

1-28-2026

UNITED STATES OF AMERICA

U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

v.

CASE NO. 3:26-cr-15-JEP-PDB
18 U.S.C. § 371
8 U.S.C. § 1325(c)

ANNY CHEN

a/k/a "Qianhua Chen"

SHA XIE

LINLIN WANG

JIAWEI CHEN

a/k/a "Gary"

YAFENG DENG

HAILING FENG

a/k/a "Helen Feng"

KIAH HOLLY

XIONGHU FANG

TAO FAN

JADEN BULLION

KIN MAN CHEOK

a/k/a "Bruce"

INDICTMENT

The Grand Jury charges:

COUNT ONE (Conspiracy to Commit Marriage Fraud)

A. Introduction

At times relevant to this Indictment:

1. The Immigration and Nationality Act ("INA") governed the immigration laws of the United States.
2. Pursuant to the INA, non-citizens of the United States ("aliens")

generally were not permitted to permanently reside in the United States unless they were lawful permanent residents (“LPRs”).

3. A United States citizen seeking to assist a relative who was an alien in obtaining LPR status in the United States was required to file United States Citizenship and Immigration Services (“USCIS”) Form I-130, Petition for Alien Relative.

4. An alien seeking to obtain LPR status in the United States was required to file USCIS Form I-485, Application to Register Permanent Residence or Adjust Status.

5. When a United States citizen filed a Form I-130 petition for an alien spouse, a visa could be immediately available to the alien spouse upon the approval of Form I-130, because the spouse was an immediate relative.

6. Immediate relatives had special immigration priority and did not have to wait in line for a visa number to become available for them to immigrate because there were an unlimited number of visas for spouses of United States citizens.

7. An immediate relative relationship generally allowed the alien spouses to apply on Form I-485, Application to Register Permanent Residence or Adjust Status, to become an LPR either at the same time or subsequent to their United States citizen spouse filing Form I-130, Petition for Alien Relative.

8. Once USCIS approved an alien for LPR status, the agency issued the alien an LPR card (Form I-551 or “green card”). The LPR card authorized the alien to lawfully reside and work in the United States.

B. The Conspiracy

9. Beginning no later than in or about March 2024, and continuing through in or about February 2025, in the Middle District of Florida, and elsewhere, the defendants,

ANNY CHEN, a/k/a "Qianhua Chen,"
SHA XIE,
LINLIN WANG,
JIAWEI CHEN, a/k/a "Gary,"
YAFENG DENG,
HAILING FENG, a/k/a "Helen Feng,"
KIAH HOLLY,
XIONGHU FANG,
TAO FAN,
JADEN BULLION,
and
KIN MAN CHEOK, a/k/a "Bruce,"

did knowingly and willfully conspire, combine, confederate, and agree with Raymond Andres Zumba, Brinio Adolfo Urena, Jacinth Bailey, Morgan Chambers, and other persons known and unknown to the grand jury, including individuals referred to herein as Conspirator-A, Conspirator-B, and Conspirator-C, to commit an offense against the United States, specifically engaging in marriage fraud in violation of 8 U.S.C. § 1325(c).

C. The Manner and Means

10. The manner and means by which the defendants and their co-conspirators carried out the conspiracy in the Middle District of Florida and elsewhere included, among other things:

a. It was part of the conspiracy that the conspirators attempted to recruit, and did recruit, U.S. citizens to join the conspiracy and marry conspirator aliens, specifically, Chinese nationals, for the purpose of evading immigration laws and illicitly obtaining beneficial immigration status for the Chinese nationals.

b. It was further part of the conspiracy that the conspirators preferred to recruit U.S. citizens who were members of the U.S. armed forces to join the conspiracy and marry Chinese nationals.

c. It was further part of the conspiracy that the conspirators would offer to pay, and did pay, U.S. citizens to marry Chinese nationals.

d. It was further part of the conspiracy that the conspirators would offer to pay, and did pay, the travel expenses of U.S. citizens who traveled to marry Chinese nationals.

e. It was further part of the conspiracy that the resulting marriages between U.S. citizens and Chinese nationals were a sham and not true marriages.

f. It was further part of the conspiracy that the conspirators would photograph the couples who were a party to these sham marriages, including during the marriage ceremonies, in an effort to create evidence that could be presented to immigration authorities to suggest that the marriages were legitimate, and the couples were in loving, committed relationships.

g. It was further part of the conspiracy that the conspirators would rely on the sham marriages as a basis for petitioning immigration authorities (by filing Forms I-130, I-485, or both) for the Chinese nationals to become lawful U.S.

residents and obtain LPR cards or green cards.

h. It was further part of the conspiracy that the conspirators sometimes used encrypted applications to communicate with each other regarding the conspiracy.

i. It was a further part of the conspiracy that the conspirators would perform acts and make statements to hide and conceal, and cause to be hidden and concealed, the purposes of the conspiracy and the acts committed in furtherance thereof.

D. Overt Acts

11. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Middle District of Florida, and elsewhere:

a. In or around March 2024, ANNY CHEN and another conspirator recruited Zumba to enter a sham marriage with XIE, a Chinese national.

b. On or about April 4, 2024, Zumba married XIE in Brooklyn, New York.

c. On or about April 4, 2024, some of the conspirators attended a party held to celebrate Zumba and XIE's sham wedding and substantiate its purported legitimacy by taking pictures to be used for immigration application purposes.

d. On or about April 4, 2024, at the wedding party, ANNY CHEN paid Zumba \$10,000 in cash for marrying XIE.

e. In or around April 2024, Conspirator-A solicited Zumba to work as a recruiter for the conspiracy, identifying and soliciting U.S. citizens to enter into sham marriages with Chinese nationals for immigration purposes.

f. On or about May 15, 2024, Zumba petitioned for immigration benefits for XIE.

g. In or around May 2024, Zumba recruited Urena, a U.S. Navy servicemember stationed in Jacksonville, Florida, to enter into a sham marriage with a Chinese national in exchange for a cash payment.

h. In August 2024, Zumba, ANNY CHEN, and WANG traveled to Jacksonville to meet with Urena, at which time Urena agreed to marry WANG, a Chinese national, in exchange for a cash payment.

i. On or about August 31, 2024, Urena married WANG in Jacksonville, after which he met with conspirators and received a cash payment.

j. After the wedding on August 31, 2024, Zumba and ANNY CHEN asked Urena to obtain a military identification card for WANG because it would facilitate the “immigration process.” Zumba also asked Urena to help him find and recruit other U.S. citizens who would be willing to marry Chinese nationals and facilitate their obtaining immigration status for money.

k. On or about September 13, 2024, using a group chat on an encrypted messaging application, Zumba and Urena recruited Chambers, a U.S. Navy servicemember stationed in Jacksonville, to enter a sham marriage.

1. On or about September 13, 2024, as part of the same group chat, Zumba told Chambers that as part of the marriage fraud scheme, she would be paid \$10,000 up front, \$20,000 when a “green card” was obtained for her future, nominal husband, and \$5,000 when the divorce was settled.

m. On or about September 17, 2024, as part of the same group chat, Zumba sent Chambers a photo of a Chinese national, later identified as JIAWEI CHEN, explaining that the Chinese national would be her “counterpart,” that is, her future, nominal husband.

n. On or about September 22, 2024, DENG, an active-duty U.S. Navy servicemember stationed overseas, contacted ANNY CHEN via a secure messaging application, stating that he had been referred to ANNY CHEN and asking whether ANNY CHEN had anybody who wanted “get green card,” and that DENG had been married before but “did not help her get green card.”

o. Beginning on or about September 23, 2024, ANNY CHEN sent messages to DENG via a secure messaging application explaining the process for him to enter a sham marriage, including how much he would be paid, what documents he would need to facilitate his nominal spouse’s immigration application, and that he would need to obtain a “military dependent ID” for his nominal spouse.

p. On or about October 4, 2024, Urena and Chambers travelled from Jacksonville to Las Vegas, Nevada, where they met ANNY CHEN and Zumba.

q. On or about October 4, 2024, in Las Vegas, Chambers met JIAWEI CHEN for the first time and married him that day.

r. On or about October 4, 2024, in the restroom of a Las Vegas restaurant, ANNY CHEN paid Chambers \$10,000 in cash for marrying JIAWEI CHEN.

s. In or around October 2024, Conspirator-B and Urena contacted Bailey, a U.S. Navy servicemember, to recruit her to enter a sham marriage.

t. In or around November 2024, Urena introduced Bailey to Zumba, who called and messaged Bailey regarding the potential sham marriage.

u. In his communications with Bailey, Zumba told her that as part of the marriage fraud scheme, she would be paid \$10,000 up front for marrying a Chinese national, as well as additional payments after applying for and obtaining a “green card” for her future, nominal husband, and then divorcing him.

v. In or around November 2024, Urena and Zumba recruited HOLLY to enter into a sham marriage, and Zumba provided information about HOLLY to ANNY CHEN and FENG via secure messaging application.

w. On or about November 12, 2024, DENG traveled to New York where he met with ANNY CHEN and other conspirators.

x. On or about November 14, 2024, DENG married Conspirator-C, a Chinese national, in New York.

y. Beginning on or about November 14, 2024, through at least on or about February 14, 2025, ANNY CHEN and DENG sent messages about how to

obtain military dependent identification cards for other conspirators, including FANG and Conspirator-C, as well as for ANNY CHEN herself.

z. From or about November 21 through on or about November 23, 2024, HOLLY traveled to New York where she met with conspirators including Zumba, FENG, and FANG, during which trip she married FANG for which HOLLY received a cash payment.

aa. Beginning on or about November 22, 2024, ANNY CHEN and FENG sent requests to Zumba for him to obtain documents from HOLLY, including her tax documents, for the purposes of FANG's immigration application documents.

bb. Beginning on or about December 3, 2024, ANNY CHEN and FENG sent requests to Zumba via secure messaging application for him to instruct HOLLY to obtain a military family member identification card for FANG.

cc. On or about December 11, 2024, DENG advised ANNY CHEN via secure messaging application that he had successfully assisted Conspirator-C with obtaining a military dependent identification card, sending pictures of the card.

dd. On or about January 1, 2025, Bailey flew to New York, where she met with Zumba and FENG to discuss her impending sham marriage with FAN, a Chinese national.

ee. On or about January 2, 2025, Zumba and FENG introduced Bailey for the first time to FAN, and then drove Bailey and FAN to a courthouse in Connecticut where Bailey married FAN.

ff. On or about January 2, 2025, FENG introduced Bailey to ANNY CHEN. ANNY CHEN asked Bailey, via FENG who translated, to apply for and obtain a military identification card for FAN that would enable FAN to access military facilities, a request about which Zumba subsequently sent follow-up messages to Bailey.

gg. After the wedding on January 2, 2025, Zumba and FENG traveled back to New York with Bailey and FAN, where they attended a party held to celebrate the sham wedding and substantiate its purported legitimacy by taking pictures to be used for immigration application purposes.

hh. At the sham wedding party on January 2, 2025, Bailey received \$10,000 in cash for marrying FAN.

ii. Between January 4, 2025, and February 4, 2025, Zumba and FENG sent messages to Bailey via an encrypted messaging application with requests for information and documents in support of the application for FAN's green card.

jj. In or around January 2025, Urena and Zumba recruited BULLION to enter into a sham marriage.

kk. On or about January 24, 2025, BULLION and Urena traveled from Jacksonville to New York, where they met Zumba, ANNY CHEN, FENG, and CHEOK for the purposes of arranging a sham marriage between BULLION and CHEOK, including BULLION providing necessary documents for the immigration application.

ll. On or about January 25, 2025, CHEOK and BULLION married in New York, for which BULLION received a cash payment. After the wedding, Urena took pictures to be used for immigration application purposes.

mm. On or about February 8, 2025, Zumba told a confidential source who was working with law enforcement (CS-1) that he and his wife (CS-2) could be paid \$35,000 each to enter fraudulent marriages.

nn. On or about February 13 and February 14, 2025, Zumba, ANNY CHEN, and FENG met with CS-1 in person in Jacksonville, Florida. Among other things, Zumba told CS-1 that, as part of the marriage fraud scheme, CS-1 and CS-2 could be paid \$35,000 each to get married, with \$10,000 up front.

oo. On or about February 13 and February 14, 2025, ANNY CHEN sent messages via secure messaging application from Jacksonville, Florida, to DENG, advising that she was on a trip to obtain a “military dependent ID.”

All in violation of 18 U.S.C. § 371.

COUNT TWO
(Marriage Fraud)

On or about on August 31, 2024, in the Middle District of Florida and elsewhere, the defendants,

ANNY CHEN, a/k/a “Qianhua Chen,”
and
LINLIN WANG,

knowingly entered into a marriage, or aided and abetted such a marriage, for the purpose of evading any provision of the immigration laws of the United States.

In violation of 8 U.S.C. § 1325(c) and 18 U.S.C. § 2.

COUNT THREE
(Conspiracy to Bribe a Public Official)

At times relevant to this Indictment:

A. Introduction

1. CS-1 was an active-duty United States Navy servicemember stationed in the Middle District of Florida.

2. CS-2 was a United States Navy civilian contract employee, assigned to the Personnel Services Detachment (“PSD”) at Naval Air Station (“NAS”) Jacksonville, in the Middle District of Florida. CS-2’s official duties included the processing and issuance of military identification cards, including Common Access Cards and Uniformed Services ID cards, to individuals who were eligible and authorized to obtain such cards.

3. The “Common Access Card,” commonly known as a “CAC” or “CAC Card,” is a smart card that serves as a standard form of legal identification issued by the United States Department of Defense (DoD). The CAC is the standard legal identification for active-duty uniformed service personnel, selected reserve personnel, DoD civilian employees, and eligible contractor personnel. It allows eligible individuals to access DoD facilities. Other individuals, such as dependent family members or foreign affiliate military personnel, are not eligible to receive CACs, but rather can obtain a different type of legal identification known as the Uniformed Services ID Card (“USID”), which also allow entrance into DoD facilities.

B. The Conspiracy

4. From an unknown date, but no later than in or around November 2024, through on or about February 14, 2025, in the Middle District of Florida, and elsewhere, the defendants,

ANNY CHEN, a/k/a “Qianhua Chen,”
HAILING FENG, a/k/a “Helen Feng,”
and
KIN MAN CHEOK, a/k/a “Bruce,”

did knowingly and willfully conspire, combine, confederate, and agree with Raymond Andres Zumba and other persons known and unknown to the grand jury, to commit an offense against the United States, specifically bribery of a public official in violation of 18 U.S.C. § 201(b)(1)(A) and (C).

C. The Manner and Means

5. The manner and means by which the defendants and their co-conspirators carried out the conspiracy in the Middle District of Florida and elsewhere included, among other things:

a. It was part of the conspiracy that the conspirators would and did corruptly give, offer, and promise to pay money to CS-1 and CS-2 in exchange for CS-2 using her official position to fraudulently create military identification cards for unauthorized persons.

b. It was a further part of the conspiracy that the conspirators would and did communicate directly and indirectly with CS-1 and CS-2 to negotiate the terms by which the conspirators would pay bribes to CS-1 and CS-2 in exchange for

the unauthorized military identification cards, including, among other things, the amount of the bribes and what level of access the cards would provide to military facilities.

c. It was further part of the conspiracy that the conspirators sometimes used encrypted applications to communicate with each other and with CS-1 regarding the conspiracy.

d. It was a further part of the conspiracy that the conspirators would and did travel to Jacksonville, Florida, to facilitate the creation of the unauthorized military identification cards.

e. It was a further part of the conspiracy that the conspirators would and did provide bribes to CS-1, that is, \$3,500 in United States currency, in exchange for two fraudulently issued military identification cards.

f. It was a further part of the conspiracy that the conspirators would perform acts and make statements to hide and conceal, and cause to be hidden and concealed, the purposes of the conspiracy and the acts committed in furtherance thereof.

D. Overt Acts

6. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Middle District of Florida, and elsewhere:

a. On or about January 23, 2025, Zumba called CS-1 via an encrypted messaging application and asked whether CS-1 and CS-2 could use CS-2's

position to create unauthorized but real “CAC Cards” in exchange for a bribe of \$1,500 per card.

b. On or about January 29, 2025, Zumba advised CS-1 during a call that the individuals who wished to obtain the unauthorized military identification cards were Chinese nationals who wanted to use the cards for immigration purposes and to access military facilities, and that they would come to Jacksonville, Florida to obtain them.

c. On or about January 31, 2025, Zumba advised CS-1 during a call that the buyers would bring cash to provide as a bribe to CS-1 and CS-2, and negotiated bribe amounts for an “active” card, which would allow access to military facilities as opposed to an inactive card.

d. On or about February 1, 2025, Zumba agreed to pay CS-1 and CS-2 \$3,500 for two cards, and arranged to travel to Jacksonville with the buyers during the week of February 10, 2025.

e. On or about February 5, 2025, Zumba advised CS-1 during a call that he would bring the individuals who wanted to obtain the unauthorized cards onto NAS Jacksonville on February 13, 2025, for the purpose of meeting CS-1 and CS-2 at the PSD so CS-2 could fraudulently create the cards.

f. On or about February 8, 2025, Zumba advised CS-1 during a call that CS-1 and CS-2 would be paid in cash for the unauthorized cards because “no traces bro.”

g. On or about February 11, 2025, Zumba advised CS-1 during a call that he and the buyers intended to drive from New York to Jacksonville on February 12, 2025, meet with CS-1 and CS-2 at the PSD on February 13, 2025, and pick up the cards from CS-1 and CS-2 on February 14, 2025.

h. On or about February 11, 2025, Zumba sent CS-1 photographs of ANNY CHEN and CHEOK's New York state driver's licenses, advising they were the two buyers who wanted unauthorized cards.

i. On or about February 12, 2025, Zumba, ANNY CHEN, CHEOK, and FENG drove from New York to Jacksonville, Florida, arriving sometime on February 13, 2025.

j. On or about February 13, 2025, at approximately 6:45 p.m., Zumba brought ANNY CHEN, CHEOK, and FENG onto NAS Jacksonville using his military identification, and brought them to the PSD.

k. On or about February 13, 2025, ANNY CHEN, CHEOK, and FENG went into the PSD with CS-2, where FENG advised CS-2 that ANNY CHEN and CHEOK wanted "military service ID cards," and acted as a translator for ANNY CHEN and CHEOK as CS-2 took their photographs and fingerprints.

l. On or about February 13, 2025, Zumba showed CS-1 a quantity of cash and stated, "This is your insurance. . . . This is 35 ok, so if you want to count it right now, you can count it right now, or if you want to wait 'til tomorrow so you can count it, 'cus they told me to give it to you tomorrow so when we get the cards and then whatever. But this is just to show you [], this is going to be your money

tomorrow.” Zumba also advised CS-1 that more individuals would want to obtain unauthorized cards if this deal was successful.

m. On or about February 14, 2025, Zumba, ANNY CHEN, and FENG met CS-1 at a restaurant in Jacksonville, Florida, to exchange the money for the unauthorized cards.

n. On or about February 14, 2025, Zumba provided CS-1 with \$3,500 in cash in exchange for two USIDs in the names of ANNY CHEN and CHEOK, which had been created for the purpose of the operation.

o. On or about February 14, 2025, after Zumba, ANNY CHEN, and FENG ate and paid for lunch with CS-1, ANNY CHEN handed Zumba an additional \$100 in cash to give to CS-1. When CS-1 asked why ANNY CHEN was giving him the money, Zumba stated she wanted to “keep this door open.”

All in violation of 18 U.S.C. § 371.

FORFEITURE

1. The allegations contained in Count Three are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a conspiracy to violate 18 U.S.C. § 201 (bribery of a public official), in violation of 18 U.S.C. § 371, the defendants shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

3. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 18 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL.

[REDACTED]
Foreperson

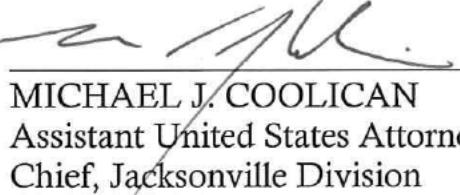
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GREGORY W. KEHOE
United States Attorney

By:


DAVID B. MESROBIAN
Assistant United States Attorney

By:


MICHAEL J. COOLICAN
Assistant United States Attorney
Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division
THE UNITED STATES OF AMERICA

vs.

ANNY CHEN
a/k/a "Qianhua Chen"
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KIN MAN CHEOK
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INDICTMENT

Violations: Cts 1 & 3: 18 U.S.C. § 371
Ct 2: 8 U.S.C. § 1325(c) and 18 U.S.C. § 2

A true bill,

Foreperson

Filed in open court this 26 day
of January, 2026.

Clerk

Bail \$ _____