

UNITED STATES DISTRICT COURT

for the

Central District of California

United States of America

v.

Wanying Zhang,
aka "Heather,"

Defendant.

Case No.

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

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 of September 1, 2025 in the county of Orange in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 951

*Offense Description*Acting As An Unregistered Agent of a
Foreign Government

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

/s/

Complainant's signature

Kevin Holt, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: October 3, 2026*Steve Kim**Judge's signature*City and state: Los Angeles, CaliforniaHon. Steve Kim, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Kevin Holt, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant for Wanying Zhang, also known as "Heather" ("ZHANG"), for violating 18 U.S.C. § 951 (Acting As An Unregistered Agent of a Foreign Government).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, all amounts or sums are approximate, and all dates and times are on or about those indicated.

II. BACKGROUND OF THE AFFIANT

3. I am a Special Agent with the Federal Bureau of Investigation and have been since August 1, 2021. I am currently assigned to an FBI Counterintelligence squad in Los Angeles, California. In order to become an FBI Special Agent, I graduated from the FBI Academy in Quantico, VA which consisted of approximately 20 weeks of training. The training included law enforcement skills such as firearms training, tactics,

surveillance techniques, interviewing, and conducting federal investigations. Since joining the FBI, I have worked a variety of Counterintelligence matters such as investigating Agents of a Foreign Government, Transnational Repression, and Export Control violations, all of which are specific to the People's Republic of China's government. Since graduating from the FBI Academy, I have also completed additional training specific to Counterintelligence investigations and operations, Human Intelligence operations, and surveillance and countersurveillance. I have also received additional training on tradecraft methods employed by foreign governments. I have conducted or participated in, among other things, physical and electronic surveillance, the execution of dozens of search warrants, and review of electronic evidence. I have experience executing warrants and orders of the type described in this affidavit.

III. SUMMARY OF PROBABLE CAUSE

4. As set forth below, ZHANG and another individual ("INDIVIDUAL 1") conducted a surveillance operation at the direction of officials from the People's Republic of China ("PRC") to photograph and gather information about a close relative of a Taiwanese government official (the "Victim").

5. Based on flight records and other evidence collected during the investigation, ZHANG and INDIVIDUAL 1 traveled to Seattle, Washington on or about September 1, 2025. Later that day, a home security camera near the Victim's home recorded ZHANG and INDIVIDUAL 1 inside of a vehicle while appearing to film the Victim and the Victim's family. ZHANG and INDIVIDUAL 1

subsequently traveled back to their residences within the Central District of California.

6. Based on records from iCloud accounts associated with ZHANG and INDIVIDUAL 1, including text communications, ZHANG was in contact with at least two people whom she appeared to acknowledge worked for the PRC government. The records further show that ZHANG sent a PRC official information related to the surveillance operation of the Victim, including photographs, videos, and license plate information associated with the Victim's vehicles. The communications also make clear that ZHANG was acting at the direction and request of one or more PRC officials.

7. ZHANG has never notified the Attorney General that she was acting, would be acting, or had acted as an agent of a foreign government or official.

IV. STATEMENT OF PROBABLE CAUSE

A. ZHANG's Contact with Suspected Chinese Government Officials

8. As part of this investigation, law enforcement obtained a federal search warrant to search iCloud accounts associated with ZHANG and INDIVIDUAL 1, signed by the Honorable Magistrate Judge Charles Eick on March 9, 2026, in case number 26-mj-1336. ZHANG's iCloud account information listed her address located at an address on Larksong in Irvine California (the "Larksong Address"). Based on public records, I know that on or about June 11, 2026, ZHANG sold the residence at the Larksong Address. Based on California Department of Motor

Vehicle ("DMV") records, United States Postal records, and surveillance conducted by the FBI, I know that ZHANG's residence is now a different residence in Irvine, CA.

9. According to records found on ZHANG's iCloud, ZHANG attended the University of International Relations ("UIR") in Beijing, China. Based on public reporting, I know that UIR is closely affiliated with China's intelligence apparatus, specifically the Ministry of State Security ("MSS"),¹ which recruits heavily from the UIR.²

10. Based on WeChat conversations found within ZHANG's iCloud, ZHANG and a purported Chinese government official ("PRC

¹ The Ministry of State Security ("MSS") is China's premier civilian intelligence agency. It functions domestically and abroad through its counterespionage, counterintelligence, foreign intelligence, and domestic intelligence roles. It also uses these functions to counter political dissent.

² The UIR has a close relationship with the China Institutes of Contemporary International Relations (CICIR), Formed in 1965, CICIR serves the senior-most Chinese Communist leadership by collecting foreign intelligence under the auspices of a policy Think Tank. See "China's International Relations Think Tanks: Evolving Structure and Process," The China Quarterly, No. 171 (Sept. 2002, pp. 575-596). The CICIR falls under the leadership of the Ministry of State Security. See "Statement before the U.S.-China Economic & Security Review Commission," January 27, 2022, available at <https://www.stimson.org/2022/statement-before-the-u-s-china-economic-security-review-commission/> (last visited August 24, 2026). Located in Beijing, CICIR is operated by senior MSS officers. A 2011 report by the CIA's Open-Source Center states, "CICIR appears to have a close relationship with the University of International Relations in Beijing, with nearly half of the organization's senior leadership – including President Cui Liru and Director of the CICIR Institute of American Studies Yuan Peng – having either taught or studied at the school." See "Profile of MSS-Affiliated PRC Foreign Policy Think Tank CICIR," Open Source Center, August 25, 2011, available at <https://irp.fas.org/dni/osc/cicir.pdf> (last visited August 21, 2026).

Official 1") were classmates at UIR, and kept in contact, both electronically and in person, since graduating in or about 2014.

B. ZHANG's Contact with PRC Official 1

11. While reviewing WeChat messages between ZHANG and PRC Official 1, I found a photo that PRC Official 1 sent to ZHANG on or about October 19, 2024. Per an FBI Chinese Language Specialist, PRC Official 1's shirt in the below photo says: "Department of Public Administration, University of International Relations. 10-year Reunion of Class of 2014." ZHANG appears with PRC Official 1 in the picture, copied below.



12. After graduating from UIR, based on the WeChat messages, ZHANG and PRC Official 1 stayed in touch, and discussed their children, investments, and differences between the United States and China, among other things.

13. On or about September 22, 2022, ZHANG and PRC Official 1 exchanged the following WeChat messages:³

ZHANG: Hello brother [Redacted], long time! How have you been?

PRC Official 1: Hello sister Wan, I have been the same

³ Each of the messages described below was originally translated from Mandarin into English by an FBI Chinese Language Specialist. I am not fluent in Mandarin. I have reviewed the translations in preparing this affidavit.

It's been a few years since I saw you, you haven't been back to China for a few years, right?

We are getting together with teacher [Redacted] this weekend.

ZHANG: Yeah, we last saw each other in 2019 when I went back to China, it's been three years. Stupid covid. Please say hi to teacher [Redacted] for me. I have not seen the teacher since I graduated and left China.

How is your work? Which bureau in the ministry are you in again?

PRC Official 1: Ok, I will say hi to him for you. Work is business as usual. Let's get together when you come back to China. I see your life is very exciting with your babies.

14. Based on my training and experience, and the training and experience and conversations with an official FBI Chinese Language Specialist who has worked on dozens of national security matters involving the People's Republic of China, the character for ministry used by ZHANG when she wrote "Which bureau in the ministry are you in again," "部," is unique to Chinese government organizations such as, but not limited to, the Ministry of State Security ("MSS"), Ministry of Public Security ("MPS"), or Ministry of Foreign Affairs ("MFA").⁴ Additionally, when ZHANG asked which bureau PRC Official 1 was in "again," it appeared to show that ZHANG already knew PRC

⁴ This practice is comparable to those in the United States intelligence community who sometimes refer to the Central Intelligence Agency as simply "the Agency," or refer to the FBI as "the Bureau."

Official 1 worked for the Chinese government, but was unsure of which part.

15. Based on my training and experience and conversations with others involved in the case, I believe PRC Official 1's lack of response, or correction, in response to ZHANG's questions about his bureau within the ministry indicates that PRC Official 1 does, in fact, work for the Chinese government.

16. On or about March 3, 2025, ZHANG and PRC Official 1 exchanged the following messages:

ZHANG: Brother [Redacted], I am going back to China at the end of this month. I will go to Beijing. Let's organize a small gathering. Ha.

ZHANG: The address you mentioned last time. I only remember [redacted number]. I forgot the street name after it [embarrassed emoji]. [Redacted street name]?⁵

PRC Official 1: Thank you for remembering. We figured out that thing. Won't have to trouble you. Let's meet up when you are back in Beijing!

17. Based on my training and experience and conversations with others involved in the case, it is likely that PRC Official 1 tasked ZHANG, while ZHANG was visiting China, to obtain information about this address. Based on my training and experience, I know that China's Intelligence Services ("CIS") often tasks individuals visiting China while they are in China in order to evade U.S. government scrutiny.

⁵ Based on conversations with other FBI officials, I have determined that the redacted address information referenced above in Irvine, California was previously associated with a Taiwanese elected official, with vocal anti-CCP views.

18. Based on a review of ZHANG's photos and travel records, I know that she was in China and met with PRC Official 1 on or about January 25, 2025. Based on these messages, I believe it is possible that PRC Official 1 tasked ZHANG with obtaining information about the residents of this address when they met in person on or about January 25, 2025, and that their conversation on Wechat afterwards was meant to clarify the address in furtherance of that tasking.

C. PRC Official 1 Introduces ZHANG to PRC Official 2

19. On or about June 9, 2025, PRC Official 1 and ZHANG exchanged the following WeChat messages:

PRC Official 1: Also, a senior⁶ from the University of International Relations wants to meet you, but he is in Hangzhou. If you are ok with it, I can give him your WeChat contact first.

ZHANG: Ok [coy emoji]

20. On or about June 10, 2025, another purported official of the Chinese government ("PRC Official 2") contacted ZHANG via WeChat. ZHANG and PRC Official 2 exchanged the following messages:

PRC Official 2: Hello, junior. I am [PRC Official 2], introduced by [PRC Official 1].

ZHANG: Hello, senior.

⁶ Based on my training and experience, the context of the conversation, and conversations with others involved in the case familiar with the cultural and linguistic patterns of individuals in the PRC, including an FBI Chinese Language Specialist, I know that the word "senior" was most likely used to refer to an individual who graduated before ZHANG and PRC Official 1 did. Conversely, "junior" would refer to someone who graduated later than the individual speaking.

21. On or about June 16, 2025, ZHANG and PRC Official 2 exchanged the following messages:

PRC Official 2: Junior, when are you going to the U.S.? I'd like to schedule a meeting with you.

ZHANG: Haven't confirmed when I will go back to the U.S. Probably next month. Ok, let's meet in Hangzhou when there is a chance.

PRC Official 2: Ok. Welcome. I happen to want to ask you something about a U.S. house.

ZHANG: Ok, you can ask me any question.

PRC Official 2: Ok, thank you.

22. Later that same day on or about June 16, 2025, ZHANG and PRC Official 1 exchanged the following messages:

ZHANG: Brother [Redacted], do we know that senior who added me last time? Added him, but he didn't tell me his name, nor which department he was from. So I am asking you. [coy emoji].

PRC Official 1: International Politics. I don't think you knew him back then.

ZHANG: Ok

PRC Official 1: Class of 08. Are you back in China?

ZHANG: Yeah, I am in Shanghai.

PRC Official 1: Let me know when you come to Beijing. The senior's name is [Redacted].

23. On or about June 27, 2025, PRC Official 2 and ZHANG exchanged the following messages:

PRC Official 2: Hello junior. Do you have time for a meal together next week?

ZHANG: But I am in Changsha.

PRC Official 2: We will come to Changsha. Are you free next Monday evening? Or Wednesday evening?

ZHANG: Are you coming to Changsha for a visit? Monday is fine.

PRC Official 2: Also for a visit.

ZHANG: Ok

PRC Official 2: Is Wednesday ok? I just checked. There are no more tickets for Monday.

ZHANG: Let me see ha.

PRC Official 2: Junior, booked a train arriving in Changsha next Monday at 6pm.⁷ See you then.

24. On or about June 30, 2025, PRC Official 2 and ZHANG exchanged the following messages:

ZHANG: Senior, how many people in your party?

PRC Official 2: Two.

PRC Official 2: Junior, which private room?

25. ZHANG then responded via audio message: "When I tried to book it, they didn't have smaller rooms available for us three people, so I booked a ten person room. Ask them. See how they arranged it."

26. Based on my training and experience and conversations with others involved in the case, I know that those working for foreign intelligence agencies, including the MSS, often conduct meetings with a partner. Additionally, based on the fact that PRC Official 1, whom ZHANG knew worked for the Chinese

⁷ Depending on the type of train, it can take between approximately three hours 15 minutes to approximately over five and a half hours from Hangzhou to Changsha.

government, introduced ZHANG to PRC Official 2, and the fact that PRC Official 2 also attended UIR, I believe ZHANG implicitly understood that PRC Official 2 was also working for the PRC government. I also believe the fact that they booked a private 10-person room for their meeting is indicative that they wished to have a private conversation, which based on my training and experience, is common practice when discussing intelligence operations.

27. On or about July 7, 2025, ZHANG and PRC Official 2 exchanged the following messages:

PRC Official 2: Hello Wanying. Have you confirmed when you will come to Hangzhou?

ZHANG: [Audio message:] Senior, I can't this time. I have stuff to attend to in the U.S. I am flying back to the U.S. today.

PRC Official 2: [Audio message:]
Oh is that right? So sudden! I was waiting for you to come to Hangzhou so we can meet. That's fine then since you have stuff to attend to in the U.S.

PRC Official 2: [Audio message:] It's ok then. Let's talk via WeChat once you get back to the U.S. about our thing last time. We will have to trouble you then. I was going to meet you this time to provide you some assurance.

ZHANG: [Audio message:]
It's ok. Let's communicate via WeChat. I might come back to China again in August, next month, we will see. If I have free time to go there, I can take care of this thing. If I don't get a chance, I will still come back to China again in August.

PRC Official 2: Ok [hand shake emoji]

28. Based on the context of these communications, I believe the reference to "our thing last time" is in reference to their June 2025 meeting in which they discussed a "U.S. house" and "some assurance" could refer to some sort of benefit conferred on ZHANG by PRC Official 2. When ZHANG said "go there," I believe she was referring to going to Seattle and by "take care of this thing," I believe she means execute the tasking, i.e., conducting surveillance on the Victim.

D. ZHANG Meets PRC Official 2 on August 21, 2025 in China

29. In late July 2025, ZHANG and PRC Official 2 began discussing meeting in August over WeChat. On August 8, 2025, ZHANG tells PRC Official 2, "I will go to Hangzhou around mid-August," and PRC Official 2 asks for her to "Please let me know once you confirm the dates."

30. On August 17, 2025, PRC Official 2 again asked whether ZHANG has confirmed her dates in China. ZHANG told PRC Official 2 that she is in Shanghai and asks if she can come to Hangzhou "tomorrow or the next day." PRC Official 2 then sent her an address for a Courtyard Marriot in Hangzhou and says "Junior, booked this hotel for Thursday night."⁸

31. Also on August 17, 2025, ZHANG messaged PRC Official 1 about her upcoming meeting with PRC Official 2.

ZHANG: Brother [Redacted], I am back in China, in Shanghai. That thing senior [PRC Official 2] talked about last time, he wanted me to go to Hangzhou again when I am free

⁸ On August 17, 2025, ZHANG sends this exact address to INDIVIDUAL 1. During this time period, based on their WeChat messages, it appears that INDIVIDUAL 1 was also in China.

I will go there in the next couple of days
Just briefing you [grin]

PRC Official 1: Ok, just communicate with senior [PRC
Official 2], I don't really know the
specific details of the work either, just do
what is within your capabilities [grin]

You are only here for a few days before you
go back to the US?

ZHANG: [Audio Message:] Yeah, he came to see me
last time in Changsha and gave me a rough
idea, he wanted me to go to Hangzhou, but I
had to go back [to the US] because something
came up, so I told him that I would come
back soon. When I came back this time, I
informed him. He wanted me to go to
Hangzhou; I happen to be in Shanghai now.
It's convenient for me to go to Hangzhou.

32. Based on my knowledge of the case, I believe these
messages indicate that PRC Official 2 tasked ZHANG with
surveilling the Seattle house during the first meeting in June
in Changsha. They also suggest that ZHANG thought PRC Official
1 needed to know what "the work" she was tasked with, but PRC
Official 1 delegated further communications to PRC Official 2.

**E. Beginning On or About August 26, 2025, ZHANG Responded
to PRC Official 2's Tasking**

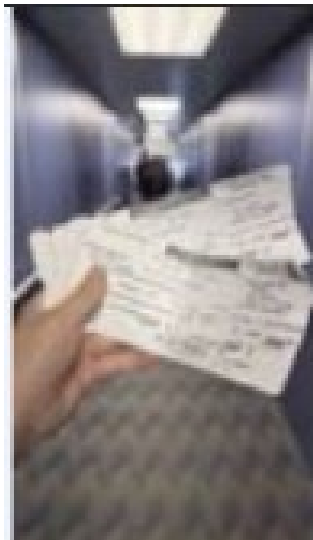
33. On or about August 26, 2025, ZHANG and PRC Official 2
exchanged the following messages:

ZHANG: Senior, I am about to land in Los Angeles.
I will be busy with work in L.A. this week.
I will probably go to Seattle next week.

PRC Official 2: Ok. Thank you for your hard work.

34. On or about September 1, 2025, ZHANG wrote to PRC
Official 2, "Boarding now to Seattle." ZHANG then sent PRC

Official 2 a photo of her boarding pass on what appears to be the jet bridge at an airport. That photo is copied below.

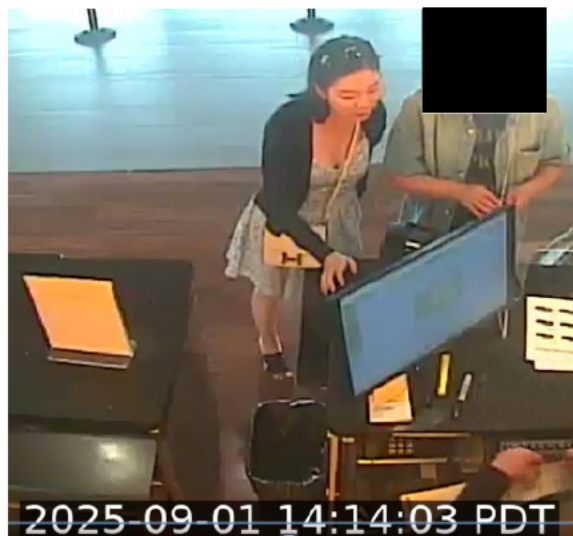


35. Based on my review of airline records, on September 1, 2025, ZHANG and INDIVIDUAL 1 flew from Las Vegas, Nevada ("LAS"), to Seattle, Washington ("SEA") on Alaska Airlines flight 629. Airline records show INDIVIDUAL 1 and ZHANG were on the same reservation, and that ZHANG paid for the flights with a credit card in her name. The address associated with the credit card used was the Larksong Address. Alaska Airlines records for ZHANG's passenger profile also listed her address as the Larksong Address.

36. Based on my review of Hertz Rental Car records, I know that at approximately 2:08 p.m. on September 1, 2025, INDIVIDUAL 1 and ZHANG rented a black 2025 Nissan Rogue SUV (the "Vehicle") from Hertz Rental Company at the Seattle International Airport under INDIVIDUAL 1's name, using his phone number, and his credit card. The address on the rental car paperwork listed INDIVIDUAL 1's address at Walnut Ave., Arcadia, California.

Based on public records, I know that INDIVIDUAL 1 sold a house at this address on or about September 11, 2025.

37. Video surveillance footage, a still of which is shown below, appeared to show ZHANG and INDIVIDUAL 1 waiting at the Hertz rental desk. The individuals in the Hertz footage resemble the California Driver's license photos of ZHANG and INDIVIDUAL 1.



38. Security camera footage from a neighbor of the Victim, which I have reviewed, shows that at approximately 4:50 p.m., ZHANG and INDIVIDUAL 1 arrived at the residence of the Victim and waited nearby in the rented car.

39. Specifically, the security camera footage shows that at approximately 6:00 p.m., the Victim came home. Shortly thereafter, the Victim's family members, including children also arrived. The security footage shows that, upon the Victim's arrival, ZHANG and INDIVIDUAL 1 quickly sat up within a black SUV, took out what appears to be their phones, and held their

phones out in a manner indicating that they were taking pictures and/or videos of the family.



40. While INDIVIDUAL 1 took pictures, ZHANG reclined her seat as if to avoid being seen.



41. Based on WeChat messages, I know that while ZHANG was still outside of the Victim's residence, ZHANG and PRC Official 2 exchanged the following messages:

ZHANG: Saw him. Young male. It's that young one.
PRC Official 2: Are you free for an audio call?
ZHANG: I am videorecording.
PRC Official 2: Ok
ZHANG: [Redacted License Plate #1], [Redacted License Plate #2]. Two license plates, record them.

42. Following that exchange, ZHANG and PRC Official 2 appear to have had a phone call.

43. Based on the state of Washington's Department of Motor Vehicle records, I know that the two license plates ZHANG sent to PRC Official 2 are registered to the Victim.

44. Also on or about September 1, 2025, ZHANG sent PRC Official 2 a video, approximately 16 seconds long, taken from ZHANG's phone of the Victim's house. It appears to be the Victim's house because the exterior matches the Victim's house and the house numbers are the same as the Victim's. In the background of the video, INDIVIDUAL 1 can be heard saying "arrived this is the house." ZHANG then responded, "yeah."

45. Upon receiving the video, PRC Official 2 responded: "[Strong emoji][Strong emoji][Strong emoji]."

46. ZHANG and INDIVIDUAL 1 returned the rental car at approximately 8:42 p.m., less than seven hours after INDIVIDUAL 1 rented it. Based on rental car records, I know that the car was not due back until the following day at 12:00 p.m.

47. Based on financial records obtained from JP Morgan Chase, I know that ZHANG's credit card account posted a charge of \$265.25 on September 2, 2025, for "Marriott Seattle Airport." From these records, I know that ZHANG paid for the hotel using a credit card in her name. The address associated with the credit card was the Larksong Address. The Seattle Airport Marriott is a hotel that is adjacent to the Seattle airport.

48. Based on my review of their flight reservations, on September 2, 2025, the pair flew from Seattle, Washington to Los Angeles International Airport ("LAX"). ZHANG paid for the flights using her credit card. The address associated with the

credit card was the Larksong Address. The reservation listed ZHANG's phone number as ending in -7405 (the "7405 number"). Phone records show the 7405 number is associated with ZHANG. Phone records also listed ZHANG's address as the Larksong Address.

49. Based on my training and experience, I know that booking travel reservations at the last minute, flying to several airports,⁹ and only using a rental car for several hours and returning it shortly thereafter are associated with tradecraft methods used by foreign intelligence officers or those working on behalf of foreign intelligence officers. I also know that intelligence officers or those working on behalf of intelligence officers surveil individuals from cars in order to do so discretely. In the context of the messages that ZHANG exchanged with PRC Official 2 while ZHANG was outside the Victim's home, I have probable cause to believe ZHANG was deploying the tradecraft on this occasion.

50. On or about September 8, 2025, ZHANG sent INDIVIDUAL 1 the follow audio messages:

ZHANG: Later on, Air Drop me the pictures.

ZHANG: Seattle pictures, don't send via WeChat or text. Must be sent over the air. I have to send it back. He wants me to send it back today.

⁹ On or about August 29, 2025, INDIVIDUAL 1 and ZHANG flew from John Wayne Airport in California to Las Vegas; on or about September 1, 2025 from Las Vegas to Seattle International Airport; and on or about September 2, 2025, from Seattle International Airport to Los Angeles International Airport.

51. Based on my training and experience, I know that foreign governments and those working on behalf of foreign governments take measures to clandestinely carry out their illegal activity in order to thwart law enforcement detection. I believe ZHANG's instruction to INDIVIDUAL 1 to send the pictures via Air Drop is a tradecraft method because photos sent via WeChat or text are sometimes recoverable by law enforcement. Furthermore, based on my knowledge of the investigation and the timing of the message, I believe ZHANG's reference to "he" is referring to PRC Official 2.

52. Later, on or about September 8, 2025, INDIVIDUAL 1 sent ZHANG a video via WeChat. Based on my review of a thumbnail of that video,¹⁰ and my review of the surveillance footage of the Victim's home, I believe that video was taken from the surveillance conducted outside of the Victim's house. In the security camera footage, which I have reviewed in preparing this affidavit, the same couple pass by the vehicle ZHANG and INDIVIDUAL 1 were in. The footage also shows INDIVIDUAL 1 in the driver's seat. The perspective of the video is from the driver's seat facing the Victim's house.

53. On or about September 11, 2025, PRC Official 2 sent ZHANG a message saying, "Hello junior, also can you send me picture(s) of the house? Thanks ha." Later, on September 11, 2025, ZHANG and INDIVIDUAL 1 exchanged the following messages:

ZHANG: Oh yeah, [location redacted] pictures, those

¹⁰ Due to technical difficulties from the WeChat extraction, I cannot play the video at this time but the thumbnail file is visible.

pictures of cars parked at the door, send them to me as well.

INDIVIDUAL 1: I deleted them all yesterday [cry][cry][cry]. Deleted the deleted pics too. I thought there was no more use for them [cry][cry]. I still have several pictures from that Chinese guy's garage.

ZHANG: [Audio Message:] See if you can recover the pictures from the deleted folder, they shouldn't be deleted yet.

INDIVIDUAL 1: I deleted that too, no more, just deleted them yesterday.

ZHANG: Fine, it is what it is.

54. ZHANG then had the following conversation with PRC Official 2 via WeChat:

ZHANG: [Audio Message:] Senior, sorry, after finish sending that day, you didn't contact me, so my friend deleted all of the pictures

[Audio Message:] The house had two cars parked by the door, hung a US flag, the house looked very normal on the outside.

PRC OFFICIAL 2: Ok. It's ok. Thank you junior.

55. Based on the context of the conversations, I believe PRC Official 2's reference to "the house" refers to the Victim's house, and "pictures" refers to the pictures taken during ZHANG and INDIVIDUAL 1's surveillance of the Victim's house. I also believe that INDIVIDUAL 1's deletion of the photos and video from his Deleted items folder was an attempt to destroy evidence of the surveillance and to conceal INDIVIDUAL 1's involvement.

56. Based on my training and experience, I believe ZHANG and INDIVIDUAL 1 were conducting surveillance on behalf of the People's Republic of China ("PRC").

57. Although Taiwan has its own democratically elected government, PRC President Xi Jinping has vowed to unify Taiwan with China. To do this, China has prioritized modernizing its military, which includes the People's Liberation Army ("PLA"), People's Liberation Army Air Force ("PLAAF"), and the People's Liberation Army Navy ("PLAN") to retake Taiwan by force, if necessary. In addition to modernizing its military, the PRC has embarked on coercive activities that go beyond normal diplomatic, economic, and security activities, which are meant to erode Taiwan's will to fight a war against China. If the PRC were to wish to obtain leverage over the President of Taiwan during any potential conflict, the location and pictures of the close relatives of a high-ranking Taiwanese government official, including pictures of their homes and cars, could be useful to the PRC. I am unaware of any possible commercial or personal benefit this information and surveillance would have for ZHANG or INDIVIDUAL 1.

58. Based on my training and experience, ZHANG's attendance at the UIR, the tradecraft used, the target of the surveillance, and ZHANG's communications with PRC Official 2, it appears that ZHANG and INDIVIDUAL 1 engaged in this activity in order to gather intelligence for the PRC at the direction of foreign officials. Engaging in surveillance of a close relative of a high-ranking member of Taiwan's government is not normal

diplomatic behavior, especially inside of the United States. Furthermore, the surveillance serves no legitimate security purpose because the Victim lives in the United States, and ZHANG and INDIVIDUAL 1 conducted the surveillance at the Victim's house, which is not a diplomatic establishment. Furthermore, ZHANG and INDIVIDUAL 1 have no apparent law enforcement employment in the United States or the PRC. Neither ZHANG nor INDIVIDUAL 1 are registered agents of the PRC. According to the investigation thus far, ZHANG is a registered real estate agent in Southern California and INDIVIDUAL 1 appears to be employed in the construction field in the Los Angeles area. I am unaware of any business or personal reason for ZHANG and INDIVIDUAL 1 to spend one day in Seattle, for which they only needed a rental car for less than half of that time.

F. ZHANG's Messages Demonstrate She Knows PRC Official 2 Works for the Chinese Government

59. In or about October 2025, ZHANG exchanged several messages with PRC Official 2 and a third individual ("INDIVIDUAL 2") that demonstrates ZHANG knows PRC Official 2 is a foreign government official. Specifically, on or about October 10, 2025, ZHANG and PRC Official 2 exchanged the following messages:

PRC OFFICIAL 2: Hello junior, you mentioned last time the biggest social media influencer, when is he coming to Shanghai?

ZHANG: Next year ha

PRC OFFICIAL 2: Oh ok. That's still far away. You will make a trip to come back, right?

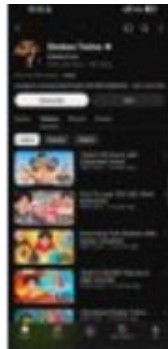
60. On or about October 22, 2025, INDIVIDUAL 2 and ZHANG exchanged the following messages:

ZHANG: Remember you said that [redacted] is coming to China and needs government resources? A classmate of mine works at Buwei, I mentioned it last time when we were talking, they from the government seemed very interested.

INDIVIDUAL 2: [Audio message:] I am partnering up with a very famous YouTuber at the beginning of next month. [redacted] cooperation is next year. It's all set in stone.

INDIVIDUAL 2: [Audio message:] If they, Buwei, government, is interested, we can connect our resources, no problem.

INDIVIDUAL 2: This is cooperation in next month, Asian Youtuber with the most followers.



INDIVIDUAL 2: [Audio message:] This is [his/her] China trip, 7 days in China, I am taking him/her to the first stop, still figuring out the content. But if you want others to interject, that's fine too, I think he/she would be willing.

61. Two days later, on October 24, 2025, ZHANG and PRC Official 2 exchanged the following messages:



ZHANG: Partnership at the beginning of next month, Asian YouTuber with the most followers

ZHANG: Senior, the Chinese influencer that I mentioned to you last time, who partnered with [redacted], told me that this influencer is coming next month. [redacted] is next year. I am back again, I am in Shanghai. First trip to China, the first stop was arranged by [Redacted].

PRC Official 2: Great!

ZHANG: 130 million YouTuber followers

PRC Official 2: It's going to be very popular. What's his itinerary in Shanghai?

ZHANG: Still figuring it out.

PRC Official 2: Oh

ZHANG: If you guys are interested in participating, I can introduce you.

PRC Official 2: Ok, thank you junior. When do you plan on staying in China this time?

ZHANG: So you have a preliminary understanding, it would be natural when [redacted] comes next time. Probably a month. If nothing urgent happens in the US.

PRC Official 2: Ok [strong emoji] good, lots of time.

62. Based on my training and experience and my knowledge of the investigation, I believe that when ZHANG referenced a person from the government with INDIVIDUAL 2, she was referring to PRC Official 2. This inference is supported by the following facts: (1) ZHANG shared the same screenshot about the influencer with PRC Official 2 that INDIVIDUAL 2 sent ZHANG, (2) the messages show that ZHANG and PRC Official 2 previously discussed the influencer prior to the conversation with INDIVIDUAL 2, and (3) ZHANG mentioned a "classmate" who worked for the government in her messages to INDIVIDUAL 2. ZHANG and PRC Official 2 appear to both have gone to UIR.

63. Furthermore, based on conversations with the FBI Chinese Language Specialist and those familiar with China's government structure and fluent in Chinese, the term Buwei - 部委 - means Ministries and Commissions, or Ministry Committee. Buwei refers to the many offices that fall under the PRC State Council which are official PRC government offices. Therefore, those working for Buwei are PRC government officials.

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V. CONCLUSION

64. For all the reasons described above, there is probable cause to believe that ZHANG has violated 18 U.S.C. § 951 (Acting As An Unregistered Agent of a Foreign Government).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this October 3, 2026.

Steve Kim

HONORABLE STEVE KIM
UNITED STATES MAGISTRATE JUDGE