

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

JUN 27 2019

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

LILI BIAN

Docket No. 3:19-cr-00191-
FDW

BILL OF INFORMATION

Violations:

31 U.S.C. §§ 5314 and 5322(a),
31 C.F.R. §§ 1010.350,
1010.306(c,d), and 1010.840(b)

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Willful Failure to File an FBAR)

(31 U.S.C. §§ 5314 and 5322(a), 31 C.F.R. §§ 1010.350, 1010.306(c,d), and 1010.840(b))

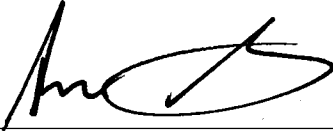
1. For 2014, citizens and residents of the United States who had a financial interest in, or signature or other authority over, one or more financial accounts in a foreign country with an aggregate value of more than \$10,000 at any time during the calendar year were required to file with the Department of the Treasury a Report of Foreign Bank and Financial Accounts, Form TD F 90-22.1 ("FBAR"). For year 2014, that report was due by June 30 of the following calendar year, June 30, 2015. The FBAR requires the filer to identify the financial institution with which the account was held, the type of account, the account number, and the maximum value of the account during the calendar year for which the FBAR is filed.

2. During calendar year 2014, defendant **LILI BIAN**, a permanent resident of the United States and a resident of Charlotte, North Carolina, had an interest in or signature authority over a financial account at FungChen Securities, a financial institution located in China, having an aggregate value in excess of the \$10,000 reporting requirement.

3. On or about June 30, 2015, within the Western District of North Carolina and elsewhere, defendant **BIAN** did knowingly and willfully fail to file an FBAR disclosing that she had a financial interest in, and signature authority over, a financial account in a foreign country,

namely an account held at FungChen Securities in China, an account which had an aggregate value of more than \$10,000 during the year 2014.

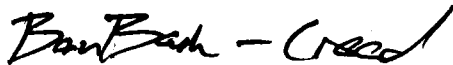
R. ANDREW MURRAY
UNITED STATES ATTORNEY



SANJEEV BHASKER
ASSISTANT UNITED STATES ATTORNEY



CARYN FINLEY
ASSISTANT UNITED STATES ATTORNEY



BEN BAIN-CREED
ASSISTANT UNITED STATES ATTORNEY