ADAM GORDON
United States Attorney
P. KEVIN MOKHTARI
Assistant U.S. Attorney
California Bar No. 253283
Office of the U.S. Attorney
880 Front Street, Room 6293
San Diego, CA 92101
Tel: (619) 546-8402
Email: Kevin.Mokhtari@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff. v. ZHAO WANG, aka "Oscar," Defendant.	Case No. 24-CR-1317-RSH **UNITED STATES' SENTENCING MEMORANDUM** Date: April 24, 2026 Time: 9:00 a.m.

The UNITED STATES OF AMERICA, by and through its counsel, United States Attorney, Adam Gordon, and Assistant U.S. Attorney P. Kevin Mokhtari, hereby files the United States' Sentencing Memorandum.

I. INTRODUCTION

Defendant Zhao Wang, aka "Oscar," was the leader of a fraud and money laundering scheme that targeted victims. Not just any victims. And not just any amount. Wang led an organization that systematically defrauded over 2,000 elderly victims. They used elaborate tech support, bank impersonation, government impersonation and refund scams. Once victims had been defrauded, they were most often duped into pulling out cash and express mailing that cash to members of Wang's organization. Behind every package was a victim. Behind every victim was a harrowing story of loss.

were made with the purpose of getting the victims to call the call center, which operated tech support, government impersonation, bank impersonation and/or refund scams.

The India-based co-conspirators would use social engineering techniques to build trust with the victims. In many instances, conspirators would have the victims download commercially available remote desktop software, which the conspirators would use to gain access to victims' computers. After building trust with a victim based on fraudulent pretenses, the conspirators would use the same scams to induce victims to send money to other members of the conspiracy, including the defendants charged in this case, via wire transfers and/or money-laden packages sent through the mail, via private and commercial interstate carriers, to locations throughout Southern California, including the Southern District of California, Nevada, and elsewhere.

Wang and his conspirators would provide fictitious names and the addresses of retail locations that could receive express mail packages to co-conspirators who were talking directly with victims. Victims were then instructed to send money-laden packages to the fictitious names and the addresses provided by the defendants.

Wang and his co-conspirators retrieved money sent by victims via express mail carriers by using false identifications and driver's licenses matching the addressee names on the victims' money-laden packages. As part of the conspiracy, Wang, personally, and some of his conspirators also received wire transfers from the victims of the scheme including to bank accounts operated and controlled by the defendants and their co-conspirators. In fact, Wang received wire transfers to his bank accounts directly from elderly victims. Throughout the investigation, agents identified over 2,000 victims across the United States that were linked to the fraud scheme and over $27 million in victim losses. Almost all of the victims are elderly, with victims averaging over 70 years-old.

Wang conspired to launder money both to promote the underlying fraud scheme and to conceal and disguise the fact that the source of the transactions was from elderly victims of the fraud scheme.

B. Organization of the Fraud Scheme

The fraud scheme involved a domestic operation and a foreign operation. The foreign operation consisted of India-based call centers that targeted Americans in a variety of tech support, refund, government impersonation and bank impersonation scams.

Once the call center had convinced a victim to send money in an express mail package, the call center would reach out to a broker, typically in India, who then reached out to the domestic operation, led by defendant Zhao Wang. The broker would request a name and an address that would ultimately be provided to the victim to send the money-laden package. The name provided by the domestic operation was a fake name that matched a fake ID. The address matched a CVS location or other location where express mail packages could be picked up.

Zhao Wang oversaw the US-based operation. Once a victim has been defrauded into sending money, the call center would pass the information regarding the package, including typically the name and address of the victim, the amount of cash expected to be in the package, the tracking number and express mail carrier, *e.g.*, UPS, FedEx, etc., and the recipient name and address, which as mentioned were originally provided to the call center from the US-based conspirators. The US-based conspirators would then use this information to track the packages and to ultimately retrieve the victim packages, which were filled with cash. The members of the conspiracy who worked for Wang would take photos and videos of themselves retrieving and counting the money sent by victims. They would then send those same photos and videos to Wang, such as the ones below.







Once the money was received and consolidated for the day from the various victim packages, the domestic operation took a percentage cut, sometimes as high as 18% of the victims' funds. Wang and his co-conspirators would send the remainder via cryptocurrency to the India-based broker.

Based on analysis of victim packages, including from evidence seized from Zhao Wang, between just Q4-2021 and Q3-2023, there were approximately 1,938 victim packages identified. On average, each victim package had approximately $14,000, with numerous victim packages containing tens of thousands of dollars. Based on this data, the FBI identified that just between Q4-2021 and Q3-2023, there was a total estimated victim loss of over $27 million USD linked to this organization.

After being arrested in 2024, Zhao Wang pled guilty in January 2026. He is now before the Court for sentencing.

C. Aggravated Role

The Court should impose an aggravated role adjustment. Under the Sentencing Guidelines, the Court may impose a 2-, 3- or 4-level upward adjustment for aggravated role. But where, as here, there were five or more participants in the offense (or the criminal activity was otherwise extensive), the Court is limited to only a 3- or 4-level upward adjustment. USSG § 3B1.1(a)-(b). And plainly, there were five or more participants in the offense as there are five participants charged in this indictment alone. The PSR likewise agrees and recommends that Wang held an aggravated role.[1]

Aggravated role is appropriate here. That is because Zhao Wang was the organizer/leader in a fraud and money laundering organization who coordinated and oversaw all the other U.S.-based members of the conspiracy. "[T]he term 'organizer' in § 3B1.1(c) applies to defendants who have the ability and influence necessary to coordinate the activities of others to achieve the desired result, whether or not they have a superior rank in a criminal hierarchy." *United States v. Doe*, 778 F.3d 814, 824 (9th Cir. 2015). "[O]nly 'some control,' which could include 'organizational responsibility,' is necessary to apply the enhancement." *United States v. Vinge*, 85 F.4th 1285, 1289 (9th Cir. 2023) (quoting *United States v. Kabir*, 51 F.4th 820, 826 (9th Cir. 2022)). An aggravated role enhancement may be appropriate as long the defendant "managed at least one participant." *United States*

[1] The PSR recommends a 2-level upward adjustment, but only a 3- or 4-level adjustment can apply since there are 5 or more participants and this scheme was otherwise extensive.