

JPL:NMA/SKW
F. #2025R00412

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

JUSTIN CHEN and
JUN ZHEN,

Cr. No. 25-303 (OEM)
(T. 18, U.S.C., §§ 981(a)(1)(C), 1349 and
3551 et seq.; T. 21, U.S.C., § 853(p); T.
28, U.S.C., § 2461(c))

Defendants.

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THE UNITED STATES ATTORNEY CHARGES:

CONSPIRACY TO COMMIT INSIDER TRADING

1. In or about and between January 2025 and June 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JUSTIN CHEN and JUN ZHEN, together with others, did knowingly and intentionally conspire to execute a scheme and artifice to defraud one or more persons in connection with one or more securities of an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934, to wit: CHEN and ZHEN obtained material non-public information about Triller Group, Inc., ARB OIT Group Limited, Ondas Holdings, Inc., Purple Innovation, Inc., Asset Entities Inc., Rumble Inc., Gryphon Digital Mining Inc., SigmaTron International, Inc., Signing Day Sports, Inc., NewGenIVF Group Limited, Getty Images Holdings, Inc., and Polyrizon Ltd. (collectively, the “Issuers”) in the course of their employment at Edgar Filer 1, an entity the identity of which is known to the United States

Attorney, and then in violation of their duties of trust and confidence to Edgar Filer 1 and the Issuers, and without disclosure to Edgar Filer 1 and the Issuers, converted that information for their own use for the purpose of executing one or more securities transactions in the stock of the Issuers.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, including but not limited to:

- (a) approximately \$30,030.09, seized on or about July 17, 2025 from Morgan Stanley E-trade account number 326423383, held in the name of Jun Zhen, and all proceeds traceable thereto;
- (b) approximately \$83,940.08, seized on or about July 16, 2025 from JPMorgan Chase account number 261150917, held in the name of Jun Zhen, and all proceeds traceable thereto;
- (c) approximately \$150,001.38, seized on or about July 16, 2025 from JPMorgan Chase account number 2901748577, held in the name of Jun Zhen, and all proceeds traceable thereto;
- (d) approximately \$123,995.04, seized on or about July 16, 2025 from JPMorgan Chase account number 3898742078, held in the name of Jun Zhen, and all proceeds traceable thereto;
- (e) approximately \$30,621.72, seized on or about July 17, 2025 from Morgan Stanley E-trade account number 153382321, held in the name of Justin Chen, and all proceeds traceable thereto;

- (f) approximately \$300,187.85, seized on or about July 16, 2025 from JPMorgan Chase account number 632562069, held in the name of Justin Chen, and all proceeds traceable thereto;
- (g) one 18K white gold Cartier style love bracelet with black ceramic “c” ircles, size 20, seized by law enforcement on or about June 28, 2025, at John F. Kennedy International Airport in Queens, New York;
- (h) one “Jaxxon” sterling silver 5mm Cuban link bracelet with CZ (synthetic) stones, seized by law enforcement on or about June 28, 2025, at John F. Kennedy International Airport in Queens, New York;
- (i) one Gents 18K yellow gold “Rolex” 40mm watch, GMT Master 11, jubilee band, model number 126718GRNR, serial number 5381K445, one link removed (in box), full set, seized by law enforcement on or about June 28, 2025, at John F. Kennedy International Airport in Queens, New York;
- (j) one mid-size 18K everose gold “Rolex” watch 31mm Datejust with chocolate roman numeral dial X1 diamonds, oyster band, model number 278275, serial number T1033573, full set, seized by law enforcement on or about June 28, 2025, at John F. Kennedy International Airport in Queens, New York; and
- (k) one Gents 18K everose gold “Rolex” 40mm watch, day/date Presidential with chocolate dial, model number 228235, serial number 2DP34231, one link removed (in box), full set, seized by law enforcement on or about June 28, 2025, at John F. Kennedy International Airport in Queens, New York.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (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,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

By David Pitluck, Assistant U.S. Attorney
JOSEPH NOCELLA, JR.
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK