

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

v.

Cr. No.

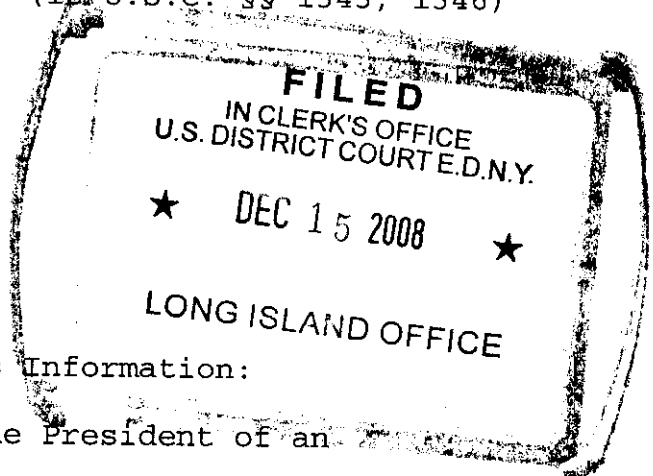
YONG ZHU,

18 U.S.C. § 1349
(18 U.S.C. §§ 1343, 1346)

Defendant.

- - - - - X

THE UNITED STATES CHARGES:



I N T R O D U C T I O N

At all times relevant to this Information:

1. The defendant Yong Zhu was the President of an importing and exporting company ("Importer -1").
2. Importer -1 is an entity organized and existing under the laws of California with its principal place of business in Chino, California. Importer -1 purchases products in China and supplies them to customers in the United States.

D E S C R I P T I O N O F T H E O F F E N S E

3. Between 2002 and 2004, the exact dates being unknown to the United States, the defendant and Co-Conspirator A, an employee of a manufacturing company ("Company A"), unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the

United States of America, to wit, to violate Title 18, United States Code, Sections 1343 and 1346, in violation of Title 18, United States Code, Section 1349. It was part and object of said conspiracy that the defendant and Co-Conspirator A, having devised and intended to devise a scheme and artifice to defraud Company A and deprive Company A of its right to the honest services of its employee, executed such scheme and artifice to defraud by and through the use of interstate telephone calls.

MEANS AND METHODS OF THE CONSPIRACY

4. During the period covered by this Information, the defendant and Co-Conspirator A participated in a scheme to defraud Company A, whereby the defendant paid Co-Conspirator A monies, and, in exchange, Co-Conspirator A selected or ensured the selection of Importer -1 to provide foreign parts to Company A.

5. As part of the conspiracy, and for the purpose of executing and attempting to execute the scheme to defraud, Co-Conspirator A informed the defendant, via telephone while the defendant was in California and Co-Conspirator A was in New York, what price or price range to quote Company A for subcontracting work. In exchange, the defendant paid Co-Conspirator A approximately \$10,000, in at least two installments during face-to-face meetings, which were discussed and arranged by telephone while the defendant was in California and Co-Conspirator A was in

New York.

6. It was further part of the conspiracy, and of the scheme and artifice to defraud, that the defendant submitted invoices to Company A that incorporated the prices dictated by Co-Conspirator A without disclosing to Company A that the defendant had paid Co-Conspirator A for the pricing information.

USE OF WIRES

7. As part of the conspiracy, and for the purpose of executing and attempting to execute the scheme to defraud, the defendant, situated in California, made numerous telephone calls to Co-Conspirator A, situated in the Eastern District of New York, to arrange meetings with Co-Conspirator A, at which payment was made to Co-Conspirator A, and to receive pricing information from Co-Conspirator A for the supply of foreign parts to Company A. At the time the defendant entered into the scheme, it was foreseeable that the use of wires would be necessary to fully execute it.


OVERT ACT


8. In furtherance of the conspiracy and to effectuate the illegal objects thereof, the defendant gave to Co-Conspirator A, an employee of Company A, an amount greater than \$10,000, representing his share of the illicit proceeds of the conspiracy in the Eastern District of New York.

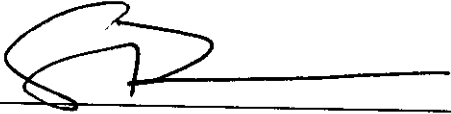
JURISDICTION AND VENUE

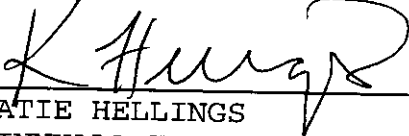
9. The conspiracy charged in this information was formed and carried out, in part, in the Eastern District of New York within the five years preceding the filing of this Information.


ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1349.


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