



# United States District Court

EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

**UNITED STATES OF AMERICA**

v.

**SHU QUAN-SHENG**

(Name of Defendant)

**CRIMINAL COMPLAINT**

**CASE NUMBER:** 2:08mj 440

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief, that is:

Count One - from in or about January, 2003 to October, 2007, within the Eastern District of Virginia and elsewhere, SHU QUAN-SHENG, the defendant, did unlawfully and willfully provide a Defense Service to the People's Republic of China without a license, in violation of the Arms Export Control Act, Title 22, United States Code, Section 2778;

Count Two - in December, 2003, within the Eastern District of Virginia and elsewhere, SHU QUAN-SHENG, the defendant, did unlawfully and willfully provide a Defense Article in violation of the Arms Export Control Act, Title 22, United States Code, Section 2778;

Count Three - in or about April, 2006, within the Eastern District of Virginia, SHU QUAN-SHENG, the defendant, did willfully bribe, offer a bribe, and attempt to bribe, a foreign government official, in violation of the Foreign Corrupt Practices Act, Title 15, United States Code, Sections 78dd-1 and 78dd-2.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Attached Affidavit.

Continued on the attached sheet and made a part hereof:  Yes  No.

  
Signature of Complainant, Special Agent Kevin P. Rojek, FBI

Sworn to before me and subscribed in my presence,  
September 19, 2008 at \_\_\_\_\_  
Date  
**TOMMY E. MILLER**  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

Norfolk, Virginia  
City and State  
  
Signature of Judicial Officer