

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 2:08cr 194
v.	)	
	)	22 U.S.C. § 2778
SHU QUAN-SHENG,	)	Export of Defense Service Without a License
	)	(Count 1)
Defendant.	)	
	)	22 U.S.C. § 2778
	)	Export of Defense Article Without a License
	)	(Count 2)
	)	
	)	15 U.S.C. §§ 78dd-1 & 78dd-2
	)	Bribery of Foreign Official
	)	(Count 3)
	)	
	)	28 U.S.C. § 2461(c), 18 U.S.C. § 981(a)(1)(C)
	)	Forfeiture

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

During the period from in or about January 2003 through October 2007, in the Eastern District of Virginia and elsewhere, SHU QUAN-SHENG, the defendant, did willfully export and cause to be exported from the United States to the People's Republic of China (PRC) a defense service covered by the United States Munitions List, that is, the furnishing of assistance in the design and development of a cryogenic fueling system for launch vehicles to be used at the heavy payload launch facility at Hainan, PRC, without first having obtained a license or written approval from the Directorate of Defense Trade Controls, United States Department of State, as required by the Arms Export Control Act, 22 U.S.C. § 2778 and the implementing International

Trade In Arms Regulations, 22 C.F.R. Chapter I, Subchapter M, Parts 120-130.

(In violation of Title 22, United States Code, Section 2778 and Title 18, United States Code, Section 2).

COUNT TWO

On or about December 20, 2003, in the Eastern District of Virginia, SHU QUAN-SHENG, the defendant, did willfully export and cause to be exported from the United States to the People's Republic of China a defense article designated on the United States Munitions List, that is, technical data contained in a document entitled "Commercial Information, Technical Proposal and Budgetary Offer – Design, Supply, Engineering, Fabrication, Testing & Commissioning of 100m3 Liquid Hydrogen Tank and Various Special Cryogenic Pumps, Valves, Filters and Instruments," dated December 20, 2003, without first having obtained a license or written approval from the Directorate of Defense Trade Controls, United States Department of State, as required by the Arms Export Control Act, 22 U.S.C. § 2778 and the implementing International Trade In Arms Regulations, 22 C.F.R. Chapter I, Subchapter M, Parts 120-130.

(In violation of Title 22, United States Code, Section 2778 and Title 18, United States Code, Section 2).

COUNT THREE

On or about the dates set forth below, in the Eastern District of Virginia and elsewhere, SHU QUAN-SHENG, the defendant, a “domestic concern,” an officer of a “domestic concern,” and an agent of an issuer, as those terms are defined and used in the Foreign Corrupt Practices Act, 15 U.S.C. §§ 78dd-1, *et seq.*, (FCPA) willfully did use and cause to be used the mails and means and instrumentalities of interstate commerce corruptly in furtherance of an offer, payment, promise to pay, and authorization of the payment of any money, and offer, gift, promise to give, and authorization of the giving of anything of value to foreign officials for purposes of (a) influencing acts and decisions of such foreign officials in their official capacities; (b) inducing such foreign officials to do and omit to do any acts in violation of the lawful duties of such officials; (c) securing an improper advantage; and (d) inducing such foreign officials to use their influence with a foreign government and instrumentalities thereof to affect and influence acts and decisions of such a foreign government and instrumentalities in order to assist defendant SHU as well as French Company A and others, in obtaining and retaining business for and with, and directing business to, any person; to wit defendant SHU, a United States citizen, on behalf of himself and his company, AMAC International Inc. (AMAC), and French Company A, an issuer as that term is used in the FCPA, offered, paid, promised to pay, and authorized payment of money or things of value to foreign officials of the People’s Republic of China’s (PRC) 101<sup>st</sup> Institute, in order to obtain for SHU, AMAC and French Company A, a contract for the development of a 600 liter per hour liquid hydrogen tank system, and in furtherance thereof, used the following means and instrumentalities of interstate commerce:

<b>PRC 101<sup>st</sup> Institute Official(s)</b>	<b>Money or Thing(s) of Value</b>	<b>Means and Instrumentalities of Interstate Commerce</b>	<b>Approx. Date</b>
PRC Official D	“Percentage Points” worth approximately \$56,800	Telephone calls between Newport News, VA and PRC	February 2006
PRC Official C and D	“Percentage Points” worth approximately \$56,800	Telephone calls between Newport News, VA and PRC	April 2006
PRC Official E	“Percentage Points” worth approximately \$75,700	Telephone calls between Newport News, VA and PRC	May 2006

(In violation of Title 15, United States Code, Sections 78dd-1 and 78dd-2, and Title 18, United States Code, Section 2).

#### FORFEITURE

1. The defendant, SHU QUAN-SHENG, as part of the sentencing pursuant to F.R.Cr.P. 32.2, shall forfeit to the United States:

- a. Any property, real or personal, which constitutes or is derived from proceeds traceable to the violation; and,
- b. Any other property of the defendant up to the value of the property subject to forfeiture above, if any property subject to forfeiture above, (a) cannot be located upon the

exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (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 that cannot be subdivided without difficulty.

2. The property subject to forfeiture under paragraph 1 includes, but is not limited to the following:


- a. A sum of money of at least \$386,740.27 and all interest traceable thereto, which represents the gross proceeds of the offenses, which upon entry of an order of forfeiture shall be reduced to a monetary judgment.
- b. Real property located at 816 Holbrook Drive, Newport News, VA.
- c. 2008 Mercedes-Benz, VIN #WDBUF56X98B220267
- d. 2001 Mercedes-Benz, VIN #WDBJF65J61B176823
- e. Contents of Bank of America Account # 0041 1302 9534
- f. Contents of Bank of America Fixed Term CD, Account #910 000 5940 2066.
- g. Contents of Bank of America Money Manager Checking Account #0041 2594 5774
- h. Contents of Bank of America Interest Checking Account #0041 1123 0082
- i. Contents of Bank of America Money Market Savings Acct #0000 9510 0203
- j. Contents of Bank of America Fixed Term CD, Account #910 000 6558 2828
- k. Contents of Bank of America Risk Free CD, Account #910 000 8959 0061
- l. Contents of Bank of America Risk Free CD, Account #910 000 8970 8471
- m. Contents of Bank of America Risk Free CD, Account #910 000 9311 2011

- n. Contents of Bank of America 9-month CD, Account #910 000 0164 9735
  
- o. Contents of Bank of America Money Manager Brokerage Account #W26-081531

(In accordance with Title 18, United States Code, Sections 981(a)(1)(C), Title 21, United States Code, Section 853(p), Title 28, United States Code, Section 2461(c)).

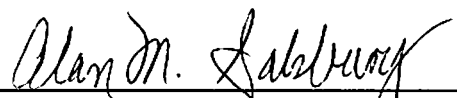
DANA BOENTE  
UNITED STATES ATTORNEY

By:

  
Alan M. Salsbury  
Assistant United States Attorney  
Virginia State Bar No. 15682  
Attorney for the United States  
United States Attorney's Office  
101 West Main Street, Suite 8000  
Norfolk, Virginia 23510  
Telephone Number - 757-441- 6331  
Facsimile Number - 757-441-6689  
E-mail Address - [alan.salsbury@usdoj.gov](mailto:alan.salsbury@usdoj.gov)

STEVEN A. TYRRELL  
CHIEF, FRAUD SECTION  
CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE

By:

  
For Robertson T. Park  
Assistant Chief, Fraud Section  
Criminal Division, U.S. Department of Justice  
1400 New York Avenue, N.W.  
Washington, D.C. 20005  
Telephone Number - 202-514-4335

REDACTED

JS 45 (11/2002)

Criminal Case Cover Sheet

U.S. District Court

Place of Offense: EDVA Under Seal: Yes \_\_\_ No X Judge Assigned: \_\_\_\_\_

Norfolk and Newport City News, VA Superseding Information \_\_\_\_\_ Criminal Number: 2:08cr 194

County/Parish \_\_\_\_\_ Same Defendant \_\_\_\_\_ New Defendant Shu Quan-Sheng

Magistrate Judge Case Number 2:08mj440 Arraignment Date: \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20/R 40 from District of \_\_\_\_\_

Defendant Information:

Juvenile -- Yes \_\_\_ No X FBI # \_\_\_\_\_

Defendant Name: Shu Quan-Sheng Alias Name(s) \_\_\_\_\_

Address: \_\_\_\_\_ Newport News, VA 23602

Employment: Owner and Operator of AMAC, International

Birth date \_\_\_\_\_ 1940 SS# \_\_\_\_\_ 7618 Sex M Race Chinese Nationality (Naturalized) U.S. Place of Birth China

Height 5'7" Weight 154 Hair Black Eyes Black Scars/Tattoos \_\_\_\_\_

Interpreter: \_\_\_ No X Yes List language and/or dialect: Chinese

Location Status:

Arrest Date 9/24/2008

\_\_\_ Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_

\_\_\_ Already in State Custody \_\_\_ On Pretrial Release \_\_\_ Not in Custody

\_\_\_ Arrest Warrant Requested \_\_\_ Fugitive \_\_\_ Summons Requested

\_\_\_ Arrest Warrant Pending \_\_\_ Detention Sought X Bond set at \$100,000.00

Defense Counsel Information:

Name: James O. Broccoletti, Esq. \_\_\_ Court Appointed

6663 Stoney Point South, Address: Norfolk, VA 23502 X Retained

Telephone: 757-466-0750 \_\_\_ Public Defender

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

U.S. Attorney Information:

AUSA Alan M. Salsbury Telephone No: 757-441-6331 Bar #15682

Complainant Agency, Address & Phone Number or Person & Title:

Federal Bureau of Investigation, 150 Corporate Boulevard, Norfolk, VA 23502, SA Kevin Rojek, 757-455-0100

U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count	Capital/Felony/Misd/Petty
Set 1	22 U.S.C. § 2778	Export of Defense Service Without a License	1	Felony
Set 2	22 U.S.C. § 2778	Export of Defense Article Without a License	2	Felony
Set 3	15 U.S.C. § 87dd-1, 78dd-2	Bribery of Foreign Official	3	Felony
Set 4	28 U.S.C. § 2461(c) 18 U.S.C. § 981(a)(1)(C)	Forfeiture		