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b. The United States Department of State, Directorate of Defense Trade Controls, regulated the export of defense articles by, among other things, requiring persons to apply for and receive validated licenses or other written approvals before exporting defense articles.

c. It was the policy of the Department of State to deny licenses and other approvals for the export, reexport or retransfer of defense articles destined for the People's Republic of China (hereinafter, "China").

d. The Endevco 7270A-200K was an accelerometer capable of measuring shocks up to 200,000 g and more, was suitable for use in "smart" bombs and for measuring motions generated by nuclear and chemical explosives, and was a defense article on the United States Munitions List.

e. Defendant QING LI resided in Connecticut.

f. Unindicted coconspirator #1 was an individual in China seeking to acquire Endevco 7270A-200K accelerometers from the United States for a state-run agency in China.

g. The Department of Homeland Security, United States Immigration and Customs Enforcement, was operating an undercover business within the Southern District of California (hereinafter, the "undercover business").

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c. On or about April 15, 2007, unindicted coconspirator #1 sent an e-mail message to the undercover business stating that unindicted coconspirator #1 understood "the nature of the business and the risks we are both facing," but hoped that the undercover business would quote a lower price.

d. On or about October 2, 2007, defendant QING LI connected an undercover federal agent to a three-way telephone call with unindicted co-conspirator #1 to discuss the delivery of the accelerometers to China.

e. On or about October 2, 2007, defendant QING LI told an undercover federal agent that the client in China wanted to receive delivery of the accelerometers before making payment.

All in violation of Title 18, United States Code, Section 371.

DATED: October 18, 2007.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By: _____
WILLIAM P. COLE
Assistant U.S. Attorney