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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

2012 APR 16 AM 10:39
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

FILED

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
HONG CARSON,)
 aka "Rose Carson,")
)
Defendant.)
)
)
)
)

SA CR No. 09-00077(B)-JVS

S U P E R S E D I N G
I N F O R M A T I O N

[15 U.S.C. § 78dd-2: Foreign
Corrupt Practices Act]

The United States Attorney charges:

INTRODUCTION

At all times relevant to this Superseding Information:

1. The Foreign Corrupt Practices Act of 1977 ("FCPA"), as amended, Title 15, United States Code, Sections 78dd-1, et seq., was enacted by Congress for the purpose of making it unlawful, among other things, for certain United States persons and business entities to act corruptly in furtherance of an offer, promise, authorization, or payment of money or anything of value to a foreign government official (or to any person, while knowing that the money or thing of value will be offered, given or

1 promised to a foreign official), for the purpose of securing any
2 improper advantage, or of assisting in obtaining or retaining
3 business for and with, or directing business to, any person.

4 2. Control Components, Inc. ("CCI") was a Delaware
5 corporation headquartered in Rancho Santa Margarita, California,
6 that designed and manufactured service control valves for use in
7 the nuclear, oil and gas, and power generation industries
8 worldwide. CCI sold its products to both state-owned enterprises
9 and private companies in approximately thirty countries around
10 the world. Because CCI was organized under the laws of a State
11 of the United States and had its principal place of business in
12 the United States, it was a "domestic concern" as that term is
13 defined in the FCPA, Title 15, United States Code, Section 78dd-
14 2(h)(1).

15 3. Defendant HONG CARSON, also known as "Rose Carson" ("R.
16 CARSON") was CCI's Manager of Sales for China and Taiwan from in
17 or around 1995 through in or around 2000 and then served as the
18 Director of Sales for China and Taiwan from in or around 2000
19 through in or around 2007. Defendant was initially a United
20 States resident and then, in 2003, became a citizen of the United
21 States. Defendant was a "domestic concern" and an employee and
22 agent of CCI and thus an employee and agent of a "domestic
23 concern" as that term is defined and used in the FCPA, Title 15,
24 United States Code, Section 78dd-2(h)(1).

25 4. CCI's customers included Kuosheng Nuclear Power Plant
26 ("Kuosheng") in Taiwan. Kuosheng was a department, agency, and
27 instrumentality of a foreign government, within the meaning of
28 the FCPA, Title 15, United States Code, Section 78dd-2(h)(2)(A).

1 The officers and employees of Kuosheng were "foreign officials"
2 within the meaning of the FCPA, Title 15, United States Code,
3 Section 78dd-2(h)(2)(A).

4 COUNT ONE

5 [15 U.S.C. § 78dd-2]

6 5. Paragraphs 1 through 4 are realleged and incorporated
7 by reference as through set forth herein.

8 6. On or about August 14, 2002, in the Central District of
9 California and elsewhere, defendant R. CARSON, did willfully make
10 use of the mails and means and instrumentalities of interstate
11 commerce corruptly in furtherance of an offer, payment, promise
12 to pay, and authorization of the payment of any money, offer,
13 gift, promise to give, and authorization of the giving of
14 anything of value to a foreign official, and to a person, while
15 knowing that all or a portion of such money and thing of value
16 would be offered, given, and promised to a foreign official, for
17 purposes of: (i) influencing acts and decisions of such foreign
18 official in his or her official capacity; (ii) inducing such
19 foreign official to do and omit to do acts in violation of the
20 lawful duty of such official; (iii) securing an improper
21 advantage; and (iv) inducing such foreign official to use his
22 influence with a foreign government and instrumentalities thereof
23 to affect and influence acts and decisions of such government and
24 instrumentality, in order to assist defendant R. CARSON and
25 others in obtaining and retaining business for and with, and
26 directing business to, CCI and others, to wit, Defendant R.
27 CARSON corruptly caused an email to be sent authorizing the
28 payment of \$40,000 to officials of Kuosheng for the purpose of

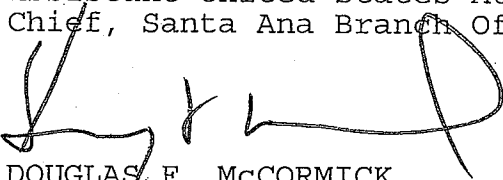
1 securing Kuosheng's business.

2 In violation of Title 15, United States Code, Section 78dd-
3 2.


4 ANDRÉ BIROTTE JR.
5 United States Attorney

6 ROBERT E. DUGDALE
7 Assistant United States Attorney
8 Chief, Criminal Division

9 DENNISE D. WILLETT
10 Assistant United States Attorney
11 Chief, Santa Ana Branch Office

12 
13 DOUGLAS F. McCORMICK
14 Assistant United States Attorney
15 Deputy Chief, Santa Ana Branch Office

16 KATHLEEN McGOVERN
17 Acting Chief, Fraud Section
18 Criminal Division
19 United States Department of Justice

20 
21 CHARLES G. LA BELLA
22 Deputy Chief, Fraud Section
23 Criminal Division
24 United States Department of Justice

25 ANDREW GENTIN
26 Trial Attorney, Fraud Section
27 Criminal Division
28 United States Department of Justice