

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
 :
 - v. - : INFORMATION
 :
 KUN SHAN CHUN, : 16 Cr.
 a/k/a "Joey Chun," :
 :
 Defendant. :
- - - - - X

COUNT ONE

The United States Attorney charges:

1. From in or about 2011, up to and including on or about March 16, 2016, in the Southern District of New York and elsewhere, KUN SHAN CHUN, a/k/a "Joey Chun," the defendant, not being a diplomatic or consular officer or attaché, did knowingly act in the United States as an agent of a foreign government without prior notification to the Attorney General, as required by law, to wit, while acting in the United States at the direction of one or more officials of the People's Republic of China, and during the course of CHUN's employment at the Federal Bureau of Investigation ("FBI"), CHUN collected sensitive

information from the FBI for transmittal to one or more Chinese government officials without previously notifying the Attorney General.

(Title 18, United States Code, Section 951.)



PREET BHARARA
United States Attorney

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Defendant.

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(18 U.S.C. § 951.)

PREET BHARARA
United States Attorney.
