

USDC SCAN INDEX SHEET



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3:06-CR-00891 USA V. CHENG
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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY _____ DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2006 Grand Jury

06 CR 0891 - R

UNITED STATES OF AMERICA,)	Criminal Case No. _____
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 22, U.S.C., Secs.
)	2778(b)(2), (c); 22 CFR 121.1,
CHIA KIA CHENG,)	123.1, 127.1(a)(1) - Attempted
aka Ronald "KC" Chia,)	Export of Defense Articles
)	Without a License
Defendant.)	
)	

The grand jury charges:

Count 1

On or about April 10, 2006, within the Southern District of California, defendant CHIA KIA CHENG, aka Ronald "KC" Chia, knowingly and willfully attempted to export from the United States to the Republic of Indonesia a defense article, that is, an M4 Carbine fully-automatic rifle, which is designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export or written authorization for such export, and committed an overt act that was a substantial step toward committing the offense, including: flew from Singapore to the United States; asked the person supplying the rifle to "express" the rifle's shipment to Indonesia; wrote an address in Indonesia on an International Air Waybill; and paid cash for the costs of the

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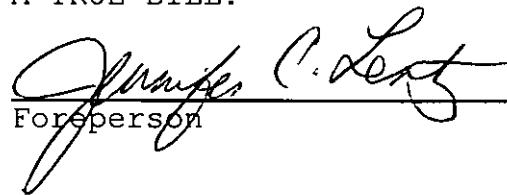
1 rifle and shipping to the Republic of Indonesia; all in violation of
2 Title 22, United States Code, Sections 2778(b)(2) and 2778(c), and
3 Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and
4 127.1(a)(1).

5 Count 2

6 On or about April 10, 2006, within the Southern District of
7 California, defendant CHIA KIA CHENG, aka Ronald "KC" Chia, knowingly
8 and willfully attempted to export from the United States to the
9 Republic of Indonesia a defense article, that is, an M4 Commando
10 fully-automatic rifle, which is designated as a defense article on the
11 United States Munitions List, without having first obtained from the
12 Department of State a license for such export or written authorization
13 for such export, and committed an overt act that was a substantial
14 step toward committing the offense, including: flew from Singapore to
15 the United States; asked the person supplying the rifle to "express"
16 the rifle's shipment to Indonesia; wrote an address in Indonesia on
17 an International Air Waybill; and paid cash for the costs of the
18 rifle and shipping to the Republic of Indonesia; all in violation of
19 Title 22, United States Code, Sections 2778(b)(2) and 2778(c), and
20 Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and
21 127.1(a)(1).

22 DATED: April 21, 2006.

23 A TRUE BILL:

24 
25 _____
Foreperson

26 CAROL C. LAM
United States Attorney

27
28 By: 
WILLIAM P. COLE
Assistant U.S. Attorney