# AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR CRIMINAL COMPLAINT AND ARREST WARRANT

Your affiant, Rhonda A. Squizzero, being duly sworn and deposed, states the following:

## INTRODUCTION

- 1. Your affiant is a Special Agent of the Federal Bureau of Investigation (FBI) and has been so employed since November 2007. Your affiant is currently assigned to the Norfolk Field Office, Peninsula Resident Agency in Newport News, Virginia (VA), and is a member of the Field Intelligence Group (FIG). Your affiant is currently investigating conspiracies and substantive violations of the Arms Export Control Act, in violation of Title 22, United States Code, §2778.
- 2. On March 13, 2013, the FBI opened this investigation predicated on facts obtained from the National Aeronautics and Space Administration (NASA), Langley Research Center (LaRC) regarding potential violations of the Arms Export Control Act, in violation of Title 22, United States Code, § 2778.

## **EXPERIENCE AND TRAINING**

- 2. Prior to employment as a Special Agent with FBI, your affiant was employed as a police officer with the City of Colorado Springs, Colorado, for approximately five (5) years.
- 3. Over the last ten years, your affiant has participated in the preparation of numerous affidavits for criminal complaints and search warrants, as well as the execution of those warrants, and has conducted hundreds of debriefings and interviews.

#### **CRIMINAL OFFENSES CHARGED**

- 4. As a result of your affiant's personal participation in this investigation, your affiant asserts that there is probable cause to believe that on March 16, 2013, within the Eastern District of Virginia, **BO JIANG**, lied to federal law enforcement authorities, in violation of Title 18, U.S.C. § 1001. Your affiant makes this affidavit in support of an application for a criminal complaint and arrest warrant for **BO JIANG** (hereinafter JIANG).
- 5. Since this affidavit is being submitted for the limited purpose of securing authorization for the issuance of an arrest warrant against the violator referred to herein, for the below



enumerated offenses, your affiant has not included each and every fact known concerning this investigation, but has set forth only those facts that are believed to be necessary to establish probable cause to arrest the aforementioned person.

#### FACTS AND CIRCUMSTANCES

- 6. This investigation was developed from information obtained from the FBI, NASA and the Department of Homeland Security (DHS). Based on a review of the information, which your affiant has determined to be reliable, and your affiant's personal participation in the investigation described herein, your affiant asserts the facts set forth in the paragraphs below:
- 7. On March 15, 2013, federal agents learned that JIANG, a Chinese National and subject of a federal investigation, was leaving the United States abruptly to return to China on a one-way ticket on March 16, 2013.
- 8. On March 16, 2013, JIANG traveled by plane from the Norfolk International Airport in Norfolk, Virginia, to Dulles International Airport in Loudon County, Virginia. While at Dulles International Airport, JIANG boarded a plane to Beijing, China. Federal Agents conducted a border stop and search of JIANG's person and personal items.
- 9. During the consensual encounter, federal agents asked JIANG what electronic media he had with him. JIANG told the Homeland Security Agent that he had a cellphone, a memory stick, an external hard drive and a new computer. However, during the search, other media items were located that JIANG did not reveal. Such items found include, an additional laptop, an old hard drive and a SIM card.
- 10. Your affiant believes this to be material to the federal investigation, in that it was important to learn what electronic media JIANG was taking out of the United States. Your affiant is aware that JIANG previously left the United States and traveled to China with a laptop belonging NASA which you affiant believes contained sensitive information.

### **CONCLUSION**

11. Based upon the information and evidence set forth above, your affiant respectfully submits that there is probable cause to believe that **BO JIANG** has committed the offense described above.



FURTHER YOUR AFFIANT SAYETH NOT.

Rhonda A. Squizzero

Special Agent

Federal Bureau of Investigation

Read and Approved:

Lisa R. McKeel

Assistant United States Attorney

Sworn and subscribed to before me

On this 16 day of March, 2013

Hon. United States Magistrate Judge

Newport News, Virginia