

OFFICIAL INDICTMENT TEXT

Beilin Procuratorate Criminal Prosecution [2025] Z12 No.

Defendant Gao Quanfu, male, born February 16, 1957, citizen ID number xxxxxx, Han ethnicity, high school education, prior to retirement was a Level 3 Orchestra Musician in the Shaanxi Province Radio, Film, and Television Ethnic Orchestra, residing at xxxxxx Changsheng Street, Beilin District, Xi'an City. On May 18, 2025, he was criminally detained by the Beilin Sub-Bureau of Xi'an City Public Security Bureau on suspicion of the crime of using superstition to undermine law enforcement. On June 23 of the same year, this court approved his arrest for fraud, executed on the same day by the Beilin Sub-Bureau of Xi'an City Public Security Bureau.

This case was investigated and concluded by the Beilin Sub-Bureau of Xi'an City Public Security Bureau, which transferred it to this court for prosecution on suspicion of fraud by defendant Gao Quanfu. After accepting the case, this court has informed the defendant of his right to entrust a defense counsel, lawfully interrogated the defendant, heard the opinions of the defendant and his defense counsel, and reviewed all case materials.

Upon lawful review and verification by this court:

In 2008, defendant Gao Quanfu, without approval from relevant departments, impersonated a religious clerical identity, arbitrarily established the illegal religious group "Zion Light," and fabricated facts that the religious group was a legitimate religious organization. He successively set up illegal religious activity venues at places such as the 8th-floor conference room of Huarong International Building on South Second Ring Road, Beilin District, this city, and Room 301, Building 1, No. 33 Torch Road, Beilin District, this city, to conduct illegal religious activities. Under the planning and organization of defendant Gao Quanfu, Shuai Zheng (deceased), Tang Bingyi (handled in another case), Pang Yu (handled in another case), and others successively joined the illegal church, impersonating religious clerical identities such as "pastor" and "elder," concealing the illegal nature of the religious group, causing victims like Zhao Qian and others to fall into mistaken understanding, thereby defrauding them of "offering funds," and using the obtained fraudulent proceeds for personal division and squandering, property purchases, etc. On September 17, 2016, defendant Gao Quanfu and others organized a "Zion Light" illegal religious group gathering at Room 301, Building 1, No. 33 Torch Road, Beilin District, this city, which was investigated by relevant departments and ordered to cease illegal activities. After the "Zion Light" illegal religious group was ordered to cease illegal activities and subsequently banned, defendant Gao Quanfu and others continued to impersonate

"pastor" and "elder" identities to persistently carry out the aforementioned fraudulent activities.

From 2008 to the time of the case, defendant Gao Quanfu, together with Shuai Zheng, Tang Bingyi, Pang Yu, and others, successively defrauded a total of RMB 25,526,250.95 in "offering funds," including RMB 2,315,176.65 from 235 reported victims such as Zhao Qian.

Evidence to support the above facts includes:

1. Case registration form, filing decision document;
2. Arrest process record;
3. Defendant's household registration information, cadre resume;
4. Administrative notice ordering cessation of illegal activities, ban decision document;
5. WeChat and Alipay transfer records, bank account transaction flows, cash ledgers, judicial appraisal opinion;
6. Extraction and seizure records, seizure list, on-site identification photos;
7. Property purchase agreement;
8. Witness testimonies;
9. Victim statements;
10. Defendant's confessions, etc.

This court holds that defendant Gao Quanfu defrauded others of property, with an especially huge amount, his actions violate the provisions of Article 266 of the Criminal Law of the People's Republic of China. The criminal facts are clear, the evidence is conclusive and sufficient, and he should be held criminally responsible for fraud. Pursuant to Article 176 of the Criminal Procedure Law of the People's Republic of China, public prosecution is instituted; please sentence accordingly.

Respectfully submitted to

Beilin District People's Court of Xi'an City, Shaanxi Province

Prosecutor Zhang Gaochao

Prosecutor Assistant Ding Ling

Prosecutor Assistant Wang Mengwei

December 31, 2025

Attachments:

1. Defendant Gao Quanfu is currently detained at Beilin Detention Center;
2. Case file of forty-seven volumes, thirteen optical discs;
3. Five copies of "Sentencing Recommendation";
4. One copy of evidence materials, one volume of audit report

Shaanxi Province Xi'an City Beilin District People's Procuratorate Sentencing
Recommendation

Beilin Procuratorate Sentencing Recommendation [2025] Z12 No.

In the case of defendant Gao Quanfu suspected of fraud, prosecuted by this procuratorate with Beilin Procuratorate Criminal Prosecution [2025] Z12 indictment, upon review, it is held that the actions of defendant Gao Quanfu violate the provisions of Article 266 of the Criminal Law of the People's Republic of China. The criminal facts are clear, the evidence is conclusive and sufficient, and he should be held criminally responsible for fraud. His statutory punishment is fixed-term imprisonment of ten years or more or life imprisonment, with fines or confiscation of property.

Due to the following sentencing circumstances:

1. Confession

Pursuant to the "Guiding Opinions on Sentencing for Common Crimes (Trial)," it is recommended to sentence defendant Gao Quanfu to fixed-term imprisonment of twelve to thirteen years, with a fine.

Respectfully submitted to

Beilin District People's Court of Xi'an City, Shaanxi Province

Prosecutor Zhang Gaochao

Prosecutor Assistant Ding Ling

Prosecutor Assistant Wang Mengwei

December 31, 2025