

**CR 18 00312 EJD SVK**

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN JOSE DIVISION**

**THE UNITED STATES OF AMERICA**

**vs.**

**XIAOLANG ZHANG**

**FILED**  
JUL 12 2018  
U.S. CL. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

**INDICTMENT**

COUNT ONE (18 U.S.C. § 1832(a)(1) – Theft of Trade Secrets)

*A true bill.*

  
\_\_\_\_\_  
*Foreperson*

Filed in open court this 12 day of July  
A.D. 2018

  
\_\_\_\_\_  
*United States Magistrate Judge*

Bail. \$ No process

1 ALEX G. TSE (CABN 152348)  
Acting United States Attorney

FILED  
JUL 12 2018  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11 **CR 18 00312** EJD  
Case No. SVK

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14  
15 XIAOLANG ZHANG,  
16 Defendant.

VIOLATION: Title 18, United States Code, Section 1832(a)(1) – Theft of Trade Secrets.

SAN JOSE VENUE

17  
18 INDICTMENT

19 The Grand Jury charges:

20  
21 COUNT ONE: (18 U.S.C. § 1832(a)(1) – Theft of Trade Secrets)

22 On or about April 30, 2018, in the Northern District of California, the defendant,

23 XIAOLANG ZHANG,

24 with the intent to convert a trade secret related to a product and service used in and intended for use in  
25 interstate and foreign commerce, specifically a 25-page document containing detailed schematic  
26 drawings of a circuit board designed to be used in the critical infrastructure of a portion of an  
27 autonomous vehicle, to the economic benefit of a person other than the trade secret's owner, and  
28 knowing and intending that the offense will injure the owner of that trade secret, Apple Inc. knowingly

1 did steal and, without authorization, appropriate, take, carry away, conceal, and by fraud, artifice, and  
2 deception obtain such information,

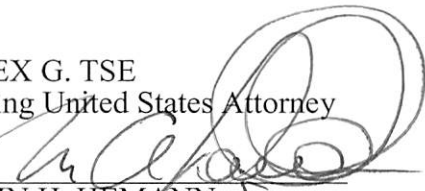
3 All in violation of Title 18, United States Code, Section 1832(a)(1).

4  
5 DATED: 7-17-18

A TRUE BILL.

  
FOREPERSON

8  
9 ALEX G. TSE  
Acting United States Attorney

10   
11 JOHN H. HEMANN  
Deputy Chief, Criminal Division

12  
13 (Approved as to form:   
14 AUSA MATTHEW A. PARRELLA  
15 AUSA AMIE D. ROONEY

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  COMPLAINT  INFORMATION  INDICTMENT  SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

**OFFENSE CHARGED**

COUNT ONE: Title 18, United States Code, Section 1832(a)(1)  
Theft of Trade Secrets.

- Petty
- Minor
- Misdemeanor
- Felony**

PENALTY: 10 years imprisonment, \$250,000 fine, \$100 special assessment, and 3 years' supervised release

**DEFENDANT - U.S.**

XIAOLANG ZHANG

DISTRICT COURT NUMBER

**CR 18 00312** FILED JUL 12 2018 EJD

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Eric M. Proudfoot, Special Agent, FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY  DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form ALEX G. TSE, Acting

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Amie D. Rooney

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)  If not detained give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

NDCA

**IS IN CUSTODY**

- 4)  On this charge
  - 5)  On another conviction  Federal  State
  - 6)  Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed?  Yes  No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

Arraignment  Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge: