

**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  
CLERK OF 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

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

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

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

XIAOLANG ZHANG,

Defendant.

CR 18 00312 EJD  
SVK

Case No.

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

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

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

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

XIAOLANG ZHANG,

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

INDICTMENT

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

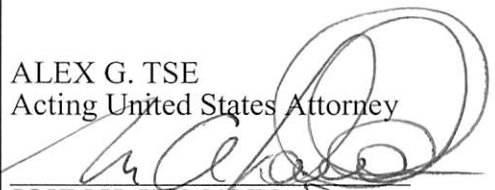
3 All in violation of Title 18, United States Code, Section 1832(a)(1).


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  
14 (Approved as to form: )

AUSA MATTHEW A. PARRELLA  
AUSA AMIE D. ROONEY

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**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

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

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

**DEFENDANT - U.S.**

XIAOLANG ZHANG

DISTRICT COURT NUMBER

CR 18 00312

 FILED  
 JUL 12 2018

EJD

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; 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 Fugitive3) ☒ Is on Bail or Release from (show District)

NDCA

**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes  
 been filed? ☐ No

 If "Yes"  
 give date  
 filed
DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; 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: \_\_\_\_\_

Comments: