

AUG 12 2021

JUDGE SHAH

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MAGISTRATE JUDGE COLE

UNITED STATES OF AMERICA

v.

TANGTANG ZHAO

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No. **21 CR 505**

Violation: Title 18, United States  
Code, Section 641

UNDER SEAL

COUNTS ONE THROUGH TWELVE

The SPECIAL JULY 2021 GRAND JURY charges:

1. At times material to this Indictment:

a. Defendant TANGTANG ZHAO was a licensed pharmacist in Illinois.

b. Company 1 operated as a retail store and pharmacy with locations across the United States, including in Chicago, Illinois.

c. Defendant ZHAO was employed as a pharmacist at Company 1.

d. Company 2 was a national medical services company.

The Federal COVID-19 Vaccination Program

e. On or about January 31, 2020, the Secretary of the United States Department of Health and Human Services (“HHS”) declared a national public health emergency under 42 U.S.C. § 247d as a result of the spread of a novel coronavirus, SARS-CoV-2, also known as “COVID-19,” to and within the United States. On or about March 13, 2020, the President of the United States issued Proclamation 9994 declaring a national emergency beginning on March 1, 2020, as a result of the rapid spread of COVID-19 within the United States. As part of the

response to the pandemic, the federal government provided funding to pharmaceutical and biotechnology companies capable of developing a vaccine for COVID-19.

f. The United States Food and Drug Administration approved the Pfizer COVID-19 vaccine for emergency use on or about December 11, 2020 and the Moderna COVID-19 vaccine for emergency use on or about December 18, 2020. Each was approved as a two-dose regimen.

g. Thereafter, the Centers for Disease Control and Prevention (“CDC”) prepared for widespread administration of the COVID-19 vaccines, including at pharmacies and retail-based clinic locations. To do so, the government purchased vaccine doses from Pfizer and Moderna. The government also contracted with Company 2 to print COVID-19 vaccination cards according to certain CDC specifications, including a requirement that the cards include a space to record the dates of the first and second vaccine doses (“CDC Vaccination Record Cards”), and to distribute the cards as part of the vaccine ancillary kits sent to each vaccine distribution location.

h. The CDC and HHS also developed rules and protocols for the entities that would administer the COVID-19 vaccine at locations around the country (“vaccine distributing entities”).

i. Company 1 was a vaccine distributing entity that administered the COVID-19 vaccines at its physical locations nationwide and, as required by the CDC, provided a CDC Vaccination Record Card to each vaccine recipient.

j. During the entirety of the vaccine administration process, Company 1, through its pharmacies, administered the vaccines at, and maintained and issued CDC Vaccination Record Cards from, its physical locations around the country, including in Chicago, Illinois.

2. On or about the dates set forth below, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TANGTANG ZHAO,

defendant herein, with the intent to deprive, did embezzle, steal, purloin, and knowingly convert to his use and the use of another, and without authority, did sell, convey, and dispose of, a thing of value of the United States and an agency thereof, namely CDC Vaccination Record Cards, with an aggregate value exceeding \$1,000, as follows:

<b>Count</b>	<b>Approximate Date</b>	<b>No. of Cards</b>	<b>Buyer</b>	<b>Approximate Amount Paid</b>
1	March 25, 2021	Ten	J.M.	\$88.03
2	March 27, 2021	Ten	S.W.	\$95.88
3	March 27, 2021	Nine	R.F.	\$84.82
4	March 29, 2021	Ten	R.F.	\$98.54
5	March 30, 2021	Ten	J.C.	\$102.08
6	March 30, 2021	Eight	P.B.	\$82.43
7	March 30, 2021	Eight	R.B.	\$80.90
8	April 1, 2021	Thirteen	S.W.	\$142.91
9	April 1, 2021	Ten	S.P.	\$103.39
10	April 2, 2021	Seventeen	A.M.	\$176.70
11	April 5, 2021	Ten	R.S.	\$104.35
12	April 11, 2021	Ten	J.W.	\$117.40

In violation of Title 18, United States Code, Section 641.

## FORFEITURE ALLEGATION

The SPECIAL JULY 2021 GRAND JURY further alleges:

1. Upon conviction of a violation of Title 18, United States Code, Section 641, as alleged in this Indictment, defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section 2461, any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

2. If any of the property described above, as a result of any act or omission by defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

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FOREPERSON.

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UNITED STATES DEPARTMENT OF JUSTICE  
CRIMINAL DIVISION, FRAUD SECTION  
ACTING CHIEF