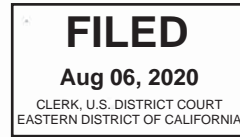


1 MCGREGOR W. SCOTT
United States Attorney
2 HEIKO P. COPPOLA
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
Facsimile: (916) 554-2900



5 Attorneys for Plaintiff
6 United States of America

7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,

CASE NO. 2:20-cr-0134 JAM

11 Plaintiff,

18 U.S.C. § 1546(a) – Fraud and Misuse of Visas;
18 U.S.C. § 1001(a)(2) – Making False Statements;
18 U.S.C. § 982(a)(6)(A)(ii)(I) and (II) – Criminal
Forfeiture

12 v.

13 TANG JUAN
aka Juan Tang,

14 Defendant.
15

16
17 INDICTMENT

18 COUNT ONE: [18 U.S.C. § 1546(a) – Fraud and Misuse of Visas]

19 The Grand Jury charges: T H A T

20 TANG JUAN, aka Juan Tang,

21 defendant herein, in the State and Eastern District of California, and elsewhere, on or about December
22 27, 2019, and on or about June 20, 2020, knowingly uttered, used, attempted to use, possessed, obtained,
23 accepted, and received a non-immigrant visa knowing the document to have been procured by means of
24 any false claim and statement, otherwise procured by fraud, and unlawfully obtained, in that the
25 defendant denied having served in the military on her non-immigrant visa application when, in fact, she
26 is currently a member of the Chinese military, in violation of Title 18, United States Code, Section
27 1546(a).

28 ///

1 COUNT TWO: [18 U.S.C. § 1001(a)(2) – Making False Statements]

2 The Grand Jury further charges: T H A T

3 TANG JUAN, aka Juan Tang,

4 defendant herein, in the State and Eastern District of California, on or about June 20, 2020, knowingly
5 and willfully made and caused to be made materially false, fictitious, and fraudulent statements and
6 representations in a matter within the jurisdiction of the Executive Branch of the Government of the
7 United States, which statements and representations were material to an investigation being conducted in
8 the Eastern District of California by the Federal Bureau of Investigation, by falsely stating that she was
9 not a member of the Chinese military. The statement and representation was false, because as the
10 defendant then and there knew, she is currently a member of the Chinese military, in violation of 18
11 U.S.C. § 1001(a)(2).

12 FORFEITURE ALLEGATION: [18 U.S.C. §§ 982(a)(6)(A)(ii)(I) and (II) – Criminal Forfeiture]

13 1. Upon conviction of the offense alleged in Count One of this Indictment, defendant
14 TANG JUAN, aka Juan Tang, shall forfeit to the United States pursuant to 18 U.S.C. §§
15 982(a)(6)(A)(ii)(I) and 982(a)(6)(A)(ii)(II), any property real or personal, that constitutes, or is derived
16 from or is traceable to proceeds obtained directly or indirectly from the commission of said violation, or
17 any property used or intended to be used to facilitate the commission of said violation, including but not
18 limited to the following:

19 a. A sum of money equal to the amount of proceeds obtained as a result of the
20 offense, for which defendant is convicted.

21 2. If any property subject to forfeiture as a result of the offense alleged in Count One of this
22 Indictment, for which defendant is convicted:

- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a third party;
- 25 c. has been placed beyond the jurisdiction of the court;
- 26 d. has been substantially diminished in value; or
- 27 e. has been commingled with other property which cannot be divided
28 without difficulty;

1 it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1), incorporating 21 U.S.C. § 853(p),
2 to seek forfeiture of any other property of said defendant, up to the value of the property subject to
3 forfeiture.

4
5
6 A TRUE BILL.

7
8 /s/ ~~Signature on file w/AUSA~~
FOREPERSON

9 
10 _____
McGREGOR W. SCOTT
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

TANG JUAN
aka Juan Tang,

INDICTMENT

VIOLATION(S): 18 U.S.C. § 1546(a) – Fraud and Misuse of Visas;
18 U.S.C. § 1001(a)(2) – Making False Statements;
18 U.S.C. § 982(a)(6)(A)(ii)(I) and (II) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this _____ 6th _____ day

of _____ August _____, A.D. 20 20 _____

/s/ P. Buzo

Clerk.

Bail, \$ NO FURTHER PROCESS NECESSARY



DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE

United States v. Tang Juan
Penalties for Indictment

COUNT 1:

VIOLATION: 18 U.S.C. § 1546(a)

PENALTIES: Maximum of up to 10 years incarceration; or fine of up to \$250,000; or both fine and imprisonment; and a term of supervised release of up to 3 years.

SPECIAL ASSESSMENT: \$100

COUNT TWO:

VIOLATION: 18 U.S.C. § 1001(a)(2)

PENALTIES: Maximum of up to 5 years incarceration; or a fine of up to \$250,000; or both fine and imprisonment; and a term of supervised release of up to 2 years.

SPECIAL ASSESSMENT: \$100

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. §§ 982(a)(6)(A)(ii)(I) and (II) – Criminal Forfeiture

PENALTIES: As stated in the charging document