

Filed by **YH** D.C.
Apr 12, 2019
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. **19-80056-CR-ALTMAN/BRANNON**

**18 U.S.C. § 1752(a)(1)
18 U.S.C. § 1001(a)(2)**

UNITED STATES OF AMERICA,

vs.

YUJING ZHANG,

Defendant.

_____ /

INDICTMENT

The Grand Jury charges that:

**COUNT ONE
Unlawful Entry of Restricted Buildings and Grounds
(18 U.S.C. § 1752(a)(1))**

On or about March 30, 2019, in Palm Beach County, in the Southern District of Florida,
the defendant,

YUJING ZHANG,

did knowingly enter and remain, and attempt to enter and remain, in a restricted building and
grounds, that is, the Mar-a-Lago Club and its grounds, without lawful authority to do so, in
violation of Title 18, United States Code, Sections 1752(a)(1) and 2.

**COUNT TWO
False Statements
(18 U.S.C. § 1001(a)(2))**

On or about March 30, 2019, in Palm Beach County, in the Southern District of Florida,
in a matter within the jurisdiction of the Department of Homeland Security, United States Secret

Service, an agency of the executive branch of the Government of the United States, the defendant,

YUJING ZHANG,

did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation to a Department of Homeland Security, United States Secret Service Agent, that is, when asked whether she was authorized to be at the Mar-a-Lago Club and its grounds, the defendant stated she was there to attend a "United Nations Friendship Event," when in truth and in fact, and as the defendant then and there well knew, no such event was scheduled at Mar-a-Lago and its grounds, in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL.



FOREPERSON

AR

ARIANA PAJARDO ORSHAN
UNITED STATES ATTORNEY

ROLANDO GARCIA
ASSISTANT UNITED STATES ATTORNEY

MICHAEL R. SHERWIN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

YUJING ZHANG,

Defendant.

Superseding Case Information:

Court Division: (Select One)

_____ Miami _____ Key West _____
_____ FTL _____ WPB _____ FTP

New Defendant(s) Yes _____ No _____
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) Yes
List language and/or dialect Mandarin
- This case will take 5 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)

(Check only one)

I	0 to 5 days	<input checked="" type="checkbox"/>	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<input checked="" type="checkbox"/>
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: _____ Case No. _____

(Attach copy of dispositive order)
Has a complaint been filed in this matter? (Yes or No) Yes

If yes: Magistrate Case No. 19-mj-08100-WM

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of 03-30-2019

Defendant(s) in state custody as of _____
Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? _____ Yes No


MICHAEL SHERWIN
ASSISTANT UNITED STATES ATTORNEY
Court No. A5501230

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: YUJING ZHANG

Case No: _____

Count #: 1

Unlawful Entry of Restricted Buildings and Grounds

Title 18, United States Code, Section 1752(a)(1)

*Max. Penalty: 1 Year Imprisonment; \$1,000 Fine; and 1 Year Supervised Release

Count #: 2

False Statements

Title 18, United States Code, Section 1001(a)(2)

* Max. Penalty: 5 Years' Imprisonment; \$250,000 Fine; 3 years' Supervised Release

Count #:

*Max. Penalty:

Count #:

*Max. Penalty:

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: _____

BOND RECOMMENDATION

DEFENDANT: YUJING ZHANG

Pre-Trial Detention
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: 
AUSA: Michael R. Sherwin

Last Known Address: _____

What Facility: _____

Agent(s): USSS S/A Samuel Ivanovich
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)