

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the Southern District of Florida

United States of America v.

Yuhao Wang and Jielun Zhang,

Defendant(s)

Case No. 20-19-5002-SNOW

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 1/4/2020 in the county of Monroe in the Southern District of Florida, the defendant(s) violated:

Code Section 18 U.S.C. § 1382

Offense Description Entering Military, Naval, or Coast Guard Property for the purpose of Photographing Defense Installations, in violation of 18 U.S.C. § 795, all in violation of 18 U.S.C. § 1382.

This criminal complaint is based on these facts: SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Chris Klettheimer signature

Chris Klettheimer, Special Agent, FBI Printed name and title

Sworn to before me and signed in my presence.

Date: 1/6/20

Lurana S. Snow signature

City and state: Key West, Florida

Lurana S. Snow, United States Magistrate Printed name and title

AFFIDAVIT

I, J. Chris Klettheimer, being duly sworn, depose and states as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been so employed since 2003. As such, I am an investigative or law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Titles 18, 21 and 46 of the United States Code. As a special agent with the FBI, I am currently assigned to the Key West Resident Agency of the FBI Miami Division and have worked numerous types of investigations throughout my career to include National Security, Transnational Organized Crime, Economic Crimes, Major Theft and Violent Crimes.

2. I make this affidavit in support of an arrest warrant for **Yuhao Wang** and **Jielun Zhang**, who are both Chinese nationals and citizens of China.

3. Based on the facts set forth in this affidavit, I submit there is probable cause to believe that **Yuhao Wang** and **Jielun Zhang** have committed a violation of 18 U.S.C. § 1382 (Entering Military, Naval or Coast Guard Property) for the purpose of taking photographs, which is a violation of 18 U.S.C. § 795.

4. The information contained in this affidavit is based upon my personal knowledge, as well as knowledge, information and documentation that I obtained from other law enforcement officers and civilian witnesses who have first-hand knowledge of the events described herein. Because this affidavit is submitted for the limited purpose of establishing probable cause, it does

not contain all of the information known to me concerning this investigation, but contains only facts necessary to establish probable cause for the instant request.

FACTS ESTABLISHING PROBABLE CAUSE

5. On January 4, 2020, at approximately 8:30 A.M., **Yuhao Wang** and **Jielun Zhang** approached the guard station at Sigsbee Annex, Naval Air Station, Key West, Monroe County, Florida while driving a blue Hyundai four door vehicle.

6. **Yuhao Wang**, the driver, and **Jielun Zhang** were together in a vehicle as they drove up to the guard station at the entrance to Sigsbee Annex. **Yuhao Wang** and **Jielun Zhang** spoke with U.S. Navy Security Forces Master at Arms (MA), who was posted at the entrance gate. The MA requested military identification, which **Yuhao Wang** and **Jielun Zhang** could not provide. The MA communicated to **Yuhao Wang** and **Jielun Zhang** they were not authorized to enter Sigsbee Annex, provided instructions to make a U-turn, and asked for a driver's license. **Jielun Zhang** provided the license to the MA. The MA re-iterated that they must make a U-turn.

7. However, **Yuhao Wang** and **Jielun Zhang**, proceeded to drive forward and continued onto Sigsbee Annex in contradiction to the instructions from the MA. In that the MA could not leave the post, she radioed to other Navy Security Forces to locate the vehicle. Sigsbee Annex has posted signs warning the area is U.S. Navy property.

8. After approximately 30 minutes on the restricted property, U.S. Navy Security Forces were able to finally locate the vehicle. At that time, they approached **Yuhao Wang** and **Jielun Zhang**. When they approached, **Yuhao Wang** and **Jielun Zhang** were in possession of cellular telephones and **Jielun Zhang** also had a Nikon camera. U.S. Navy Security Forces obtained consent to look at the devices and observed photographs taken on the Sigsbee Annex property, including U.S. military structures on Fleming Key.

9. **Yuhao Wang** and **Jielun Zhang** were interviewed by your affiant. **Yuhao Wang** and **Jielun Zhang** both told the agents that they read and understand English.

10. **Yuhao Wang** was advised of his *Miranda rights* and agreed to waive his rights and speak to the agents. **Yuhao Wang** acknowledged they were asked at the gate by a female wearing military clothing for military identification and when they could not provide any, were directed to make a U-turn. **Yuhao Wang** advised he did not make a U-turn and drove onto the property eventually stopping, parking the vehicle and taking photographs with his cellular telephone. **Yuhao Wang** voluntarily showed agents the photographs he took while on Sigsbee Annex.

11. **Jielun Zhang** was advised of his *Miranda rights* and agreed to waive his rights and speak to the agents. Zhang acknowledged a female at the gate asked for military identification and provided his Michigan driver's license. **Jielun Zhang** also confirmed they were asked to make a U-turn by the female at the gate. **Jielun Zhang** explained they continued onto the property, driving around until they stopped, parked the vehicle and took photographs with his camera and videos with his cellular telephone. **Jielun Zhang** voluntarily showed agents the photographs and videos on the camera and cellular telephone he took while on Sigsbee Annex.

CONCLUSION

12. Based on the foregoing facts, I submit there is probable cause to believe **Yuhao Wang** and **Jielun Zhang** have violated 18 U.S.C. § 1382 (Entering Military, Naval or Coast Guard Property) for the purpose of taking photographs, which is a violation of 18 U.S.C. § 795.



J. Chris Klettheimer, Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 6 day of January, 2020.



LURANA S. SNOW
UNITED STATES MAGISTRATE JUDGE