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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD GUSTAVE OLSON, JR.,

Defendant.

No. 2:22-cr-00104-PA

I N F O R M A T I O N

[18 U.S.C. § 1018: Making a False Writing; 18 U.S.C. §§ 207(f) (1) (B), 216(a) (1): Aiding and Assisting a Foreign Government with Intent to Influence Decisions of United States Officers]

[CLASS A MISDEMEANORS]

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

A. PERSONS AND ENTITIES

1. Defendant RICHARD GUSTAVE OLSON, JR. was a career foreign service officer employed by the United States ("U.S.") State Department. Defendant OLSON was appointed by the President and confirmed by the U.S. Senate to serve as Ambassador to the United Arab Emirates ("UAE") from on or about October 14, 2008 through May

1 2, 2011 and to serve as Ambassador to Pakistan from on or about
2 October 31, 2012 through November 17, 2015.

3 a. From on or about November 17, 2015 through his
4 retirement on November 30, 2016, defendant OLSON served as U.S.
5 Special Representative for Afghanistan and Pakistan ("Special
6 Representative").

7 b. In or about December 2016, after retiring from
8 government service, defendant OLSON created an entity called Medicine
9 Bear International Consulting, LLC ("Medicine Bear").

10 2. Person 1 was a naturalized U.S. citizen born in Pakistan.
11 Person 1 operated various informal and formal business entities
12 collectively referred to as Person 1's Company. As part of his
13 business operations, Person 1 was retained by various foreign
14 governments and individuals to engage in lobbying and public
15 relations efforts. Person 1 received funds from foreign clients,
16 used those funds to make political campaign contributions to U.S.
17 politicians, parlayed those contributions into political influence in
18 the U.S., and lobbied U.S. officials on behalf of his foreign
19 clients.

20 a. In or about March 2013, Person 1 met with defendant
21 OLSON in Islamabad, Pakistan. From in or about March 2013 through
22 November 2016, Person 1 solicited defendant OLSON's advice and
23 assistance in his capacity as Ambassador with respect to a variety of
24 business matters of interest to Person 1.

25 b. In or about November or December 2016, either just
26 prior to, or shortly after, defendant OLSON retired from government
27 service, Person 1 agreed to retain the services of defendant OLSON
28 for \$20,000 per month plus expenses. On or about December 15, 2016,

1 Person 1 sent defendant OLSON his first monthly check payable to
2 Medicine Bear in the amount of \$20,000.

3 B. ETHICS OBLIGATIONS AND REPORTING REQUIREMENTS

4 3. To increase public confidence in the federal government,
5 demonstrate the integrity of government officials, and enhance the
6 ability of the citizenry to judge the performance of public
7 officials, the U.S. Congress enacted the Ethics in Government Act of
8 1978 ("the Act"). The Act established an agency within the Executive
9 Branch, the Office of Government Ethics ("OGE"), to oversee public
10 employee compliance with U.S. ethics laws.

11 4. Because transparency was a critical part of government
12 ethics, Congress determined that U.S. citizens should know their
13 leaders' financial interests. Accordingly, the Act and its
14 implementing regulations required certain government employees
15 ("public filers") to file public financial disclosure reports on an
16 annual basis. The annual reports, known as OGE Forms 278, required
17 the employee to disclose financial matters including their income,
18 assets, liabilities, outside employment arrangements, gifts,
19 reimbursements, and travel expenses. The OGE 278 forms certified
20 that the statements the public filer made on the form and all
21 attached schedules were true, complete, and correct to the best of
22 the public filer's knowledge. In both his capacities as Ambassador
23 and Special Representative, defendant OLSON was a public filer.

24 5. OGE and the employee's agency were jointly charged with
25 ensuring compliance with ethics laws and reporting obligations,
26 investigating possible violations, and referring possible violations
27 to the agency's Inspector General and the U.S. Department of Justice
28 for civil enforcement or criminal prosecution.

1 6. The Act also imposed "revolving door" prohibitions upon
2 senior government officials. After retirement from government
3 service, senior government officials were prohibited from
4 representing foreign entities before U.S. officials or aiding or
5 advising any foreign entity, including through any behind-the-scenes
6 consulting, with the intent to influence U.S. officials during a one-
7 year "cooling off" period. Congress enacted similar "revolving door"
8 restrictions into a criminal statute, Title 18, United States Code,
9 Section 207(f). In accordance with these laws, defendant OLSON was
10 prohibited from engaging in lobbying activity or aiding or advising
11 any foreign government in its attempts to influence U.S. officials
12 during the period December 1, 2016 through December 1, 2017. During
13 this time, defendant OLSON was aware of the "revolving door"
14 prohibitions and understood that they applied to him.

15 C. WHILE EMPLOYED BY THE FEDERAL GOVERNMENT, DEFENDANT OLSON
16 RECEIVED OVER \$18,000 IN TRAVEL EXPENSES FROM PERSON 1 TO ATTEND
17 A JOB INTERVIEW WITH BUSINESSPERSON 2 IN LONDON

18 7. On or about January 15, 2015, defendant OLSON, who was then
19 still serving as U.S. Ambassador to Pakistan, met with Person 1 in
20 Los Angeles and discussed the possibility that defendant OLSON might
21 work for Person 1's business associate, Businessperson 2, a citizen
22 of Bahrain, who operated Businessperson 2's Company. On or about
23 January 23, 2015, defendant OLSON agreed to meet Person 1 and
24 Businessperson 2 in London on January 31.

25 8. On or about January 27, 2015, Person 1 procured defendant
26 OLSON's first-class airfare from New Mexico, via Los Angeles, to
27 London. Person 1 paid for the trip with a combination of credit card
28 expenditures and approximately 330,000 frequent flyer miles. In
total, the airfare was worth approximately \$18,829. Person 1 paid

1 for his and defendant OLSON's stay at a luxury hotel in London at a
2 combined cost of approximately \$2,298. Person 1 also paid for dinner
3 in London for defendant OLSON, Businessperson 2, Person 1, and
4 another individual at a cost of approximately \$589.

5 9. On or about February 19, 2015, Businessperson 2's Company
6 offered defendant OLSON a one-year contract with Businessperson 2's
7 Company, commencing after defendant OLSON's retirement from
8 government service, that included compensation of \$300,000 per year.

9 D. AFTER HIS RETIREMENT FROM GOVERNMENT SERVICE, DEFENDANT OLSON
10 PROVIDED AID AND ADVICE TO QATAR

11 10. After defendant OLSON began working for Person 1 and Person
12 1's Company in December 2016, despite being aware that he was subject
13 to the "revolving door" prohibitions of the Act and Section 207(f),
14 defendant OLSON violated these prohibitions on multiple occasions.

15 a. DEFENDANT OLSON PROVIDED AID AND ADVICE TO QATAR TO
16 FACILITATE LOBBYING U.S. OFFICIALS TO ESTABLISH U.S.
CUSTOMS PRECLEARANCE FACILITIES AT DOHA INTERNATIONAL
AIRPORT

17 11. U.S. Customs and Border Protection ("CBP") preclearance
18 facilities at foreign international airports provided significant
19 benefits to host countries and their national airlines. CBP allowed
20 flights originating from a precleared airport to fly directly from
21 that airport to over 160 destinations in the United States,
22 regardless of whether the destination airport had a CBP port of
23 entry. Preclearance facilities thus provided a host country's
24 airport an advantage over competitors for the U.S.-bound traveler
25 market.

26 12. In or about January 2014, while defendant OLSON was serving
27 as Ambassador to the UAE, the U.S. and the UAE negotiated to
28

1 establish a CBP preclearance facility at the Abu Dhabi International
2 Airport in the UAE -- one of Qatar's regional rivals.

3 13. On or about October 25, 2016, Person 1 caused the drafting
4 of a contract between Person 1's Company and a Qatar-based holding
5 company controlled by Qatar Government Official 1, whereby Person 1's
6 Company would be paid \$3.5 million per year plus a 20% "success fee."

7 14. On or about November 14, 2016, Qatar Government Official 1
8 transferred by wire \$2.8 million to Person 1's Company.

9 15. On or about December 27, 2016, Qatar Government Official 1
10 transferred by wire \$3 million to Person 1's Company.

11 16. On or about January 23, 2017, Businessperson 3, a business
12 associate of Person 1, sent defendant OLSON a draft plan for a
13 lobbying campaign to convince the White House and the U.S. Department
14 of Homeland Security ("DHS") to establish preclearance facilities at
15 Doha International Airport.

16 17. The next day, on or about January 24, 2017, defendant OLSON
17 sent Person 1 and Businessperson 3 an email that included his advice
18 on how Qatar could "sell" its preclearance proposal to the U.S.
19 government. For example, defendant OLSON advised that it would be
20 important to secure the support of the U.S. Ambassador to Qatar,
21 stating, "I know her well but can't do it because of State's post
22 employment ethics restrictions, but [Person 1] can charm her she's
23 from LA. The deal closer would be for the Qataris help her get a new
24 Embassy[.]"

25 18. On or about January 29, 2017, Businessperson 3 emailed a
26 revised lobbying plan to defendant OLSON and Person 1, incorporating
27 defendant OLSON's input. The revised plan called for Qatar to lobby
28 the U.S. House of Representatives, U.S. Senate, White House National

1 Security Council, DHS, and specific CBP officials, followed by a
2 negotiated agreement between DHS and the government of Qatar to
3 establish preclearance facilities at Doha International Airport.

4 19. On or about January 31, 2017, defendant OLSON sent
5 Businessperson 3 further revisions to the lobbying plan. Defendant
6 OLSON recommended that Qatar leverage its support for the U.S.
7 military to obtain the preclearance facilities it sought, stating,
8 "We also believe it should be possible to leverage Qatar's strong
9 record of support for the U.S., particularly the U.S. military, to
10 push the pre-clearance program through."

11 20. On or about February 14, 2017, Businessperson 3 emailed the
12 preclearance lobbying plan that incorporated defendant OLSON's advice
13 to a government email address of Qatar Government Official 3, an
14 official with the Qatar Ministry of Interior, copying Qatar
15 Government Official 1, defendant OLSON, and Person 1.

16 21. On or about March 9, 2017, Person 1 sent Qatar Government
17 Official 1 a copy of Person 1's Company's draft contract with the
18 Qatar-based holding company. In a cover email, Person 1 stated,
19 "this will incorporate preclearance project."

20 b. DEFENDANT OLSON PROVIDED AID AND ADVICE TO QATAR TO
21 FACILITATE LOBBYING U.S. OFFICIALS TO SUPPORT QATAR
DURING A DIPLOMATIC CRISIS

22 22. On or about May 24, 2017, cyber hackers, reportedly funded
23 by the UAE, committed a computer intrusion at the Qatar News Agency
24 website. The hackers posted statements, purportedly by Qatar
25 Government Official 2, that appeared supportive of the Government of
26 Iran. Hackers also leaked emails of the UAE's Ambassador to the
27 United States that discussed Qatar's support for the Muslim
28 Brotherhood and militant groups.

1 23. On or about June 5, 2017, citing Qatar's purported support
2 for Iran and terrorism, several Gulf states, including the UAE and
3 the Kingdom of Saudi Arabia, cut ties with Qatar and implemented a
4 blockade, closing all air and sea lanes to the country ("the Gulf
5 Diplomatic Crisis").

6 24. On or about June 6, 2017, several U.S. House
7 representatives introduced House Resolution 2712 "to impose sanctions
8 with respect to foreign support for Palestinian terrorism[.]" The
9 Resolution identified Qatar as providing financial support to Hamas,
10 a terrorist organization.

11 25. On or about June 1, 2017, Person 1 enlisted the help of
12 defendant OLSON, Businessperson 3, and Businessperson 4 to organize
13 and participate in a lobbying and public relations campaign to
14 convince the U.S. government to support Qatar during the Gulf
15 Diplomatic Crisis. The lobbying and public relations effort sought
16 to use the Gulf Diplomatic Crisis as a business opportunity and to
17 profit from defendant OLSON's status as a former U.S. Ambassador to
18 the UAE, Qatar's primary rival in the crisis, and defendant OLSON's
19 ability to provide aid and advice to Qatar.

20 26. Defendant OLSON's aid included recruiting Person 3 to join
21 defendant OLSON in providing aid and advice to Qatari government
22 officials with the intent to influence U.S. foreign policy with
23 respect to the Gulf Diplomatic Crisis. On or about June 6, 2017,
24 defendant OLSON contacted Person 3 to enlist his support in the
25 endeavor. That same day, defendant OLSON emailed Person 1 that he
26 had been in touch with Person 3 and informed him that Person 3 was
27 "interested in helping out with Qatar."
28

1 27. On or about June 10, 2017, defendant OLSON, Person 1,
2 Person 3, Businessperson 4, and Qatar Government Official 1 traveled
3 to Doha, Qatar. After checking into their hotel, defendant OLSON and
4 Person 3 met with the U.S. Ambassador to Qatar to discuss the purpose
5 of their trip.

6 28. That same day, on or about June 10, 2017, defendant OLSON,
7 Person 1, and Person 3 traveled to the Qatari royal palace to meet
8 with senior Qatari government officials, including Qatar Government
9 Official 2, Qatar Government Official 4, Qatar Government Official 5,
10 and Qatar Government Official 6. The Qatari government officials did
11 not permit Person 1 to attend the meetings.

12 29. On or about June 15, 2017, defendant OLSON, Person 1, and
13 Person 3 met for dinner with Qatar Government Official 4 at a hotel
14 in Washington, D.C.

15 30. On or about June 28, 2017, defendant OLSON, Person 1,
16 Person 3, and Qatar Government Official 5 met with several sitting
17 members of the U.S. House of Representatives for the purpose of
18 convincing the U.S. lawmakers to support Qatar rather than its
19 regional rivals in the Gulf Diplomatic Crisis.

20 31. These Introductory Allegations are incorporated into each
21 Count of this Information.

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COUNT ONE

[18 U.S.C. § 1018]

32. On or about May 12, 2016, defendant RICHARD GUSTAVE OLSON, JR., a public officer, knowingly made and delivered his annual OGE Form 278 for the 2015 calendar year, in which he certified his answers were "true, complete and correct to the best of my knowledge." In this OGE Form 278, defendant OLSON knowingly failed to disclose material matters to the U.S. State Department and Office of Government Ethics, as required, namely, the travel benefits he received from Person 1 including the airfare from New Mexico to Los Angeles, the airfare from Los Angeles to London, and the lodging in London, collectively worth over \$19,000.

COUNT TWO

[18 U.S.C. §§ 207(f) (1) (B), 216(a) (1)]

33. From on or about February 14, 2017, to on or about June 28, 2017, in Qatar, within the extraterritorial jurisdiction of the United States, and elsewhere, defendant RICHARD GUSTAVE OLSON, JR., a person who was subject to the restrictions contained in Title 18, United States Code, Section 207(c), within one year after leaving the position, office, and employment of United States Special Representative for Afghanistan and Pakistan, knowingly aided and advised a foreign entity, namely, the Government of Qatar, with the intent to influence decisions of officers and employees of departments and agencies of the United States in carrying out their official duties, namely: (1) the decisions of officers and employees of the White House National Security Council, DHS, and CBP as to whether to establish preclearance facilities at Doha International Airport in Doha, Qatar; and (2) the decisions of officers and employees of the Executive Branch of the United States government,

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1 including the National Security Advisor, as to whether and how to
2 support Qatar in the Gulf Diplomatic Crisis.

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