

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on May 3, 2018

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	
	:	
MARIA BUTINA,	:	VIOLATIONS:
Also known as:	:	
Maria Butina,	:	18 U.S.C. § 371
	:	(Conspiracy)
Defendant	:	
	:	18 U.S.C. § 951
	:	(Agents of Foreign Governments)

Case 1:18-cr-00218
Assigned To : Judge Chutkan, Tanya
Assign. Date : 7/17/2018
Description: INDICTMENT (B)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

General Allegations

At all times material to this Indictment:

1. **MARIA BUTINA**, also known as “**MARIA BUTINA**” (“**BUTINA**”), was a Russian citizen who entered the United States in August 2016 on an F-1 Student Visa. On the visa application to the U.S. Department of State, **BUTINA** declared under penalty of perjury that while she had been previously employed as Special Assistant to the **RUSSIAN OFFICIAL**, this employment had ended on May 20, 2016. Despite her attestation, **BUTINA** continued to act under the direction and control of the **RUSSIAN OFFICIAL** for the purpose of advancing the interests of the Russian Federation after she entered the United States.
2. The **RUSSIAN OFFICIAL**, whose identity is known to the grand jury, was a Russian citizen and a high-level official in the Russian government. The **RUSSIAN OFFICIAL**

was previously a member of the legislature of the Russian Federation and later became a top official at the Russian Central Bank. In April 2018, pursuant to Executive Order 13661, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), in consultation with the U.S. Department of State, sanctioned the RUSSIAN OFFICIAL.

3. U.S. Person 1, whose identity is known to the grand jury, was a United States citizen and an American political operative. U.S. Person 1 worked with **BUTINA** to arrange introductions to U.S. persons having influence in American politics, including an organization promoting gun rights (hereinafter "GUN RIGHTS ORGANIZATION"), for the purpose of advancing the interests of the Russian Federation.

4. At no time was **BUTINA** a duly accredited diplomatic or consular officer; an officially and publicly acknowledged and sponsored official or representative of the Russian Federation; or an officially and publicly acknowledged and sponsored staff member or employee thereof.

5. At no time did **BUTINA** notify the Attorney General, whose office in the Department of Justice is located in the District of Columbia, that she would and did act in the United States as an agent of a foreign government and official.

The Conspiracy

6. Beginning no later than in or around 2015, and possibly earlier, and continuing up until the present, in the District of Columbia and elsewhere, **BUTINA** and others known and unknown to the grand jury, including the RUSSIAN OFFICIAL, knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States,

to wit, Title 18, United States Code, Section 951, in violation of Title 18, United States Code, Section 371.

Objects of the Conspiracy

7. The objects of the conspiracy were:
 - a. To act in the United States as an agent of a foreign government, specifically the Russian Federation, without prior notification to the Attorney General;
 - b. To act in the United States as an agent of a foreign government official, specifically the RUSSIAN OFFICIAL, without prior notification to the Attorney General;
 - c. To exploit personal connections with U.S. persons having influence in American politics in an effort to advance the interests of the Russian Federation, without prior notification to the Attorney General; and
 - d. To infiltrate organizations active in American politics in an effort to advance the interests of the Russian Federation, without prior notification to the Attorney General.

Manner and Means of the Conspiracy

8. **BUTINA** and her conspirators would and did use the following manner and means, among others, to accomplish the objects of the conspiracy:
 - a. While acting under the direction and control of an official of the Russian Federation, **BUTINA** would meet in person and communicate via electronic means with that official for the purpose of developing and executing a plan to identify and exploit personal connections with U.S. persons having influence in

American politics, who were in positions to advance the interests of the Russian Federation.

- b. For the purpose of advancing the interests of the Russian Federation, **BUTINA** established a relationship with U.S. Person 1 in Moscow who, thereafter, would work with **BUTINA** in the United States to arrange introductions to U.S. persons having influence in American politics.
- c. While residing in the United States, **BUTINA** would work on behalf of the **RUSSIAN OFFICIAL** by attempting to establish unofficial lines of communications with U.S. politicians and political organizations for the purpose of advancing the interests of the Russian Federation.
- d. **BUTINA** would communicate via email, Twitter direct message, and other means with the **RUSSIAN OFFICIAL**, and others, to send reports, seek direction, and receive orders in furtherance of the conspiracy.

Overt Acts

9. In furtherance of this conspiracy, and to accomplish its purposes and objects, at least one of the conspirators committed or caused to be committed, in the District of Columbia, and elsewhere, at least one of the following overt acts, among others:

- a. On or about March 14, 2016, **BUTINA** emailed a U.S. person in an effort to develop, maintain, and exploit a relationship in furtherance of the conspiracy.
- b. In or around August 2016, **BUTINA** entered the United States on an F-1 Student Visa for the claimed purpose of attending university full time in the District of Columbia, while continuing to act as an agent on behalf of the Russian Federation and the **RUSSIAN OFFICIAL**.

- c. On or about September 26, 2016, **BUTINA** emailed a U.S. person to organize an event for the purpose of influencing the views of U.S. officials, as those views relate to the Russian Federation.
- d. On or about November 11, 2016, **BUTINA** sent the **RUSSIAN OFFICIAL** a Russian-language report that proposed ways to establish dialogue with U.S. politicians through a conference.
- e. On or about February 2, 2017, **BUTINA** and the **RUSSIAN OFFICIAL** attended the National Prayer Breakfast in the District of Columbia, along with a delegation from the Russian Federation.

(Conspiracy to Act as an Agent of a Foreign Government in violation of Title 18, United States Code, Sections 371 and 951.)

COUNT TWO


10. The allegations set forth in paragraphs 1 through 5 of Count One of this indictment are realleged and incorporated by reference herein.

11. Between in or around January 2015 and up to and including the present, in the District of Columbia and elsewhere, defendant **MARIA BUTINA, also known as "MARIA BUTINA,"** did act within the United States as an agent of a foreign government, without prior notification to the Attorney General, whose office in the Department of Justice is located in the District of Columbia.

(**Agents of Foreign Governments** in violation of Title 18, United States Code, Section 951)

A TRUE BILL

FOREPERSON


Attorney of the United States in
and for the District of Columbia