

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT-COURT

for the
District of Columbia

United States of America
v.
Mariia Butina
also known as Maria Butina
DOB:

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)
)
)
)
)

Case No.

Defendant(s)

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 Between 2015 and Feb. 2017 in the county of in the
District of Columbia, the defendant(s) violated:

Code Section 18 U.S.C. § 371
Offense Description Conspiracy
See Appendix A, which is incorporated herein.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Complainant's signature

Kevin Helson, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/14/2018

Judge's signature

City and state: Washington, D.C.

Deborah A. Robinson, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN THE MATTER OF AN APPLICATION
FOR CRIMINAL COMPLAINT FOR
MARIIA BUTINA, ALSO KNOWN AS
MARIA BUTINA

Case No. _____

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Kevin Helson, being first duly sworn, hereby depose and state that I am a Special Agent with the Federal Bureau of Investigation (FBI) and charge as follows:

THE FBI INVESTIGATION

1. The bases of my knowledge for the facts alleged herein are as follows. I have been a Special Agent with the FBI for 15 years. Currently, I am assigned to the Counterintelligence Division within the Washington Field Office of the FBI. The focus of my counter intelligence efforts has been the investigation of the foreign intelligence activities of the Russian Federation. I have learned the facts contained in this affidavit from, among other sources, my personal participation in this investigation, my discussions with other law enforcement agents, searches that have been conducted, surveillance that has been conducted, and reviews of documents, electronic items, and other evidentiary materials.

2. In the course of this investigation, the FBI has employed a variety of lawful investigative methods, including the acquisition of Rule 41 search warrants of two premises, which included authorization to search electronic devices. One of those searches included a laptop computer belonging to MARIIA BUTINA, a/k/a “Maria Butina” (“BUTINA”), (hereinafter “BUTINA’s Laptop”) and an iPhone belonging to BUTINA (hereinafter “BUTINA’s iPhone”). Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of this investigation. Further, any

statements related herein are related in substance and in part only. Finally, certain items related herein were translated by FBI linguists from Russian to English.

BACKGROUND

Title 18, U.S. Code, sections 371 (Conspiracy) and 951 (Agents of Foreign Governments)

3. Title 18 of the United States Code, section 371 (Conspiracy to Commit Offense or to Defraud United States), makes it a criminal offense for any person(s) to conspire together with one or more others either to commit an offense against the United States or to defraud the United States, or any agency thereof, in any manner or for any purpose.

4. Title 18 of the United States Code, section 951 (Agents of Foreign Governments), makes it a criminal offense for any person, other than a diplomatic or consular official or attaché, to act in the United States as an agent of a foreign government without prior notification to the Attorney General, as required by law. For purposes of this law, the term “agent of a foreign government” includes an individual who agrees to operate within the United States subject to the direction or control of a foreign government or official.

Relevant Persons and Definitions

5. Defendant BUTINA is a Russian citizen who entered the United States in August 2016 on an F-1 Student Visa. Before and after her arrival in the United States, BUTINA served as Special Assistant to the RUSSIAN OFFICIAL. Conspiring together, BUTINA and the RUSSIAN OFFICIAL took various overt acts in furtherance of the conspiracy and to effect the illegal purpose thereof.

6. The RUSSIAN OFFICIAL is 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. The RUSSIAN OFFICIAL directed BUTINA’s activities in furtherance of the conspiracy.

7. U.S. Person 1 is a United States citizen and an American political operative. BUTINA established contact with U.S. Person 1 in Moscow in or around 2013. U.S. Person 1 worked with BUTINA to jointly 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 agenda of the Russian Federation.

8. U.S. Person 2 is a United States citizen who was included among the participants in a series of email communications in 2016 and 2017 that reveal BUTINA’s efforts to arrange a series of dinners in the District of Columbia and New York City involving Russian nationals and U.S. persons having influence in American politics (hereinafter “friendship and dialogue dinners”). BUTINA told U.S. Person 2 that the RUSSIAN OFFICIAL was “very much impressed by you” and that “the Russians will support the efforts from our side.”

9. The Ministry of Foreign Affairs of the Russian Federation (MFA) is the Russian government agency with primary responsibility for the Russian Federation’s foreign relations and foreign policy.

Actions of the Russian Federation

10. The Russian Federation, or Russia, is one of the leading state intelligence threats to U.S. interests, based on its capabilities, intent, and broad operational scope. Penetrating the U.S. national decision-making apparatus and the Intelligence Community are primary objectives for numerous foreign intelligence entities, including Russia. The objective of the Russian Federation leadership is to expand its sphere of influence and strength, and it targets the United States and U.S. allies to further that goal.

11. Russian influence operations are a threat to U.S. interests as they are low-cost, relatively low-risk, and deniable ways to shape foreign perceptions and to influence populations. Moscow seeks to create wedges that reduce trust and confidence in democratic processes, degrade

democratization efforts, weaken U.S. partnerships with European allies, undermine Western sanctions, encourage anti-U.S. political views, and counter efforts to bring Ukraine and other former Soviet states into European institutions.

12. In 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, listed seven Russian oligarchs and 12 companies they own or control, 17 senior Russian government officials, including the RUSSIAN OFFICIAL, and a state-owned Russian weapons trading company and its subsidiary, a Russian bank, as specially designated nationals. OFAC sanctioned the RUSSIAN OFFICIAL for being an Official of the Government of the Russian Federation. In sanctioning these entities, U.S. Treasury Secretary Steven T. Mnuchin announced:

The Russian government engages in a range of malign activity around the globe, including continuing to occupy Crimea and instigate violence in eastern Ukraine, supplying the Assad regime with material and weaponry as they bomb their own civilians, attempting to subvert Western democracies, and malicious cyber activities. Russian oligarchs and elites who profit from this corrupt system will no longer be insulated from the consequences of their government's destabilizing activities.

THE DEFENDANT'S ACTIVITIES ON BEHALF OF RUSSIA

13. As detailed below, the FBI's investigation has revealed that BUTINA, the defendant, was working in the United States at the direction of the RUSSIAN OFFICIAL.

14. The FBI's investigation has further revealed that BUTINA and the RUSSIAN OFFICIAL took steps to develop relationships with American politicians in order to establish private, or as she called them, "back channel" lines of communication. These lines could be used by the Russian Federation to penetrate the U.S. national decision-making apparatus to advance the agenda of the Russian Federation.

15. The FBI's investigation has also revealed that BUTINA and the RUSSIAN

OFFICIAL planned to advance Moscow's long-term strategic objectives in the United States, in part, by establishing relationships with American political organizations, including the GUN RIGHTS ORGANIZATION. Based on my training, experience and familiarity with this investigation, I believe that BUTINA and the RUSSIAN OFFICIAL took these steps in order to infiltrate those groups and advance the interests of the Russian Federation.

16. The Russian influence operation included, among other things, (i) taskings from the RUSSIAN OFFICIAL to BUTINA; (ii) meetings between BUTINA and U.S. politicians and political candidates; (iii) BUTINA's attendance at events sponsored by special interest groups, also attended by U.S. politicians and political candidates; and (iv) BUTINA's reporting back to Moscow through the RUSSIAN OFFICIAL the results of the various encounters with the U.S. politicians and political candidates.

Laying the Groundwork in Russia

17. During the course of her work as a covert Russian agent, BUTINA regularly met and communicated with the RUSSIAN OFFICIAL and U.S. Person 1 to plan and develop the contours of the influence operation.

18. On or about March 24, 2015, BUTINA emailed U.S. Person 1 with the subject line of "The Second Pozner."¹ The body of this email also contained a project proposal. BUTINA noted to U.S. Person 1 in the email that she was sending the "Google Translator text. Maybe I could translate it myself but it would take at least a day because the text is very specific." She went on to note that she "will be happy to answer to any your questions [sic] and follow your recommendations before a [sic] finally send it." The first line of the proposal reads, "Project Description 'Diplomacy.'" It goes on to state that a major U.S. political party [hereinafter

¹ I believe that this statement likely refers to Vladimir Pozner, a propagandist who served in the disinformation department of the Soviet KGB and who often appeared on Western television to explain the views of the Soviet Union during the Cold War.

“POLITICAL PARTY 1”], would likely obtain control over the U.S. government after the 2016 elections; that POLITICAL PARTY 1 is “traditionally associated with negative and aggressive foreign policy, particularly with regards to Russia. However, now with the right to negotiate seems best to build konstruktivnyh [sic] relations;” and that “[c]entral place and influence in the [POLITICAL PARTY 1] plays the [GUN RIGHTS ORGANIZATION]. The [GUN RIGHTS ORGANIZATION] [is] the largest sponsor of the elections to the US congress, as well as a sponsor of The CPAC conference and other events.”

19. The March 24, 2015 email further highlighted BUTINA’s relationship with the GUN RIGHTS ORGANIZATION’s leadership, including her attendance at events in the United States and BUTINA’s and the RUSSIAN OFFICIAL’s connections to officials of the GUN RIGHTS ORGANIZATION. BUTINA described recent visits to the United States, including references to instances when she was introduced to POLITICAL PARTY 1 leaders as a “representative of informal diplomacy” of the Russian Federation. BUTINA’s project proposal concluded by noting, “[t]he resulting status needs to be strengthened is in the current time interval, before the presidential election in 2016,” and requesting a budget of \$125,000 for BUTINA to participate in “all upcoming major conferences” of POLITICAL PARTY 1.

20. In late March 2015, U.S. Person 1 replied to BUTINA via email with the subject “Potential American Contacts”:

Dear Maria,

* * *

Your challenge in your “special project” will be to balance two opposing imperatives: Your desire to communicate that you speak for Russian interests that will be ascendant (still around) in a post-Putin world while simultaneously doing nothing to criticize the President or speed the arrival of his successor.

This restriction is easily understood in private meetings with political and business leaders. It will SEVERELY limit your interactions with media.

Most of the potential “guest appearances” listed under media will only be possible if you’re willing to be more candid (honest) than is politically prudent for you. But ALL of the media personalities listed would be interested in meeting you “off the record” – though your patrons / sponsors may not fully understand the power of such meetings if you do not appear on television, radio, or print as you do in Russia.

* * *

[T]here is NO limit as to how many American companies that you can meet—at the highest levels—if you are able to represent that you are a potential line of communication into future Russian Federation governments.

In this email, U.S. Person 1 listed potential media, business, and political contacts, and closed with, “Everyone on this list understands (to some degree) U.S. / Russian relations under President Obama and President Putin. Everyone on this list would like to better understand U.S. / Russian relations under new presidents for each country. YOU can provide commentary on both— if you’re willing to take that risk.”

21. Also in late March 2015, U.S. Person 1 emailed BUTINA, with the subject line “Your Plan Forward.” In this email, U.S. Person 1 told BUTINA that

If you were to sit down with your special friends and make a list of ALL the most important contacts you could find in America for a time when the political situation between the U.S. and Russia will change, you could NOT do better than the list that I just emailed you. NO one – certainly not the “official” Russian Federation public relations representative in New York – could build a better list. And for a variety of current political reasons, the current Russian ambassadors to the United States and United Nations do not even try.

YOU HAVE ALREADY MET ALL OF THE AMERICANS necessary to introduce you to EVERYONE on that list. . . .

If you had NOT spent the last year attending conferences in America, it would take you ANOTHER year to be able to meet the names on that list. What you have done is prepare all of the groundwork (necessary introductions) in order to be introduced to everyone on that list. All that is needed is for your friends to provide you with the financial resources to spend the time in America to TAKE ALL OF THESE MEETINGS. I and your friends in America can’t make it any easier for you than that.

Your potential sponsors either understand this or they don't. The names of all of the people that impress your friends by listing them. All that your friends need to know is that meetings with the names on MY list would not be possible without the unknown names in your "business card" notebook. Keep them focused on who you are NOW able to meet, NOT the people you have ALREADY met.

22. Your affiant has reviewed a number of .pdf documents stored in BUTINA's Laptop containing Twitter direct messages between BUTINA and the RUSSIAN OFFICIAL that reflect direction and coordination of BUTINA's efforts by the RUSSIAN OFFICIAL. The direct messages between BUTINA and the RUSSIAN OFFICIAL in the latter half of 2015 include:

- A conversation between the RUSSIAN OFFICIAL and BUTINA regarding an article published by BUTINA in *The National Interest* on or about June 12, 2015, which argued that certain U.S. politicians and Russians share many common interests. BUTINA asked the RUSSIAN OFFICIAL to look at the article, and the RUSSIAN OFFICIAL said it was very good;
- A request by the RUSSIAN OFFICIAL for BUTINA to "write [him] something brief" about a political event in the United States which she was scheduled to attend. BUTINA provided that write-up the next day, which included descriptions of her speaking to a political candidate on the night of the announcement, as well as BUTINA's previous private meeting with the candidate at the 2015 annual GUN RIGHTS ORGANIZATION members' meeting;
- Discussions about the RUSSIAN OFFICIAL's anticipated attendance at a National Prayer Breakfast (including whether he had received approval to attend from the MFA), and providing the RUSSIAN OFFICIAL with

biographies of U.S. politicians and executives of the GUN RIGHTS ORGANIZATION;

- Discussions about the RUSSIAN OFFICIAL's plans to meet with a U.S. Congressman during a Congressional Delegation trip to Moscow in August 2015. In that conversation, BUTINA noted that she has the RUSSIAN OFFICIAL's diplomatic passport and can purchase a plane ticket for him from St. Petersburg to Moscow; and
- A statement from BUTINA to the RUSSIAN OFFICIAL that the latter "has the responsibility of a serious mission – restoration of relations between countries." BUTINA continued by saying that this is a long game and that "maybe, by inviting the [GUN RIGHTS ORGANIZATION] here, you have prevented a conflict between two great nations. [] although, I think, this is the very beginning of the journey."

23. Based on my training, experience, and familiarity with this investigation, I believe that the above-described email and Twitter conversations represent BUTINA's plan to conduct activities as an illegal agent of the Russian Federation in the United States through a Russian influence operation.

Acts in the United States

24. BUTINA's efforts in the United States to promote the political interests of the Russian Federation were diverse and multifaceted, including BUTINA's efforts to organize a series of "friendship and dialogue" dinners, some of which are believed to have taken place in the District of Columbia, as well as BUTINA's attendance at two National Prayer Breakfasts in the District of Columbia.

25. On or about January 19, 2016, BUTINA and the Russian Representative exchanged

Twitter direct messages regarding logistics for the 2016 National Prayer Breakfast. The RUSSIAN OFFICIAL noted that the MFA had given approval for his attendance.

26. On February 4, 2016, both BUTINA and the RUSSIAN OFFICIAL attended the 2016 National Prayer Breakfast in the District of Columbia.

27. A series of email communications (also known as “email strings”) spanning March 10 and 11, 2016 and involving BUTINA, U.S. Person 1, and U.S. Person 2 reveal BUTINA’s efforts to arrange the “friendship and dialogue” dinners in the District of Columbia and New York City near the end of May 2016. U.S. Person 1 provided a list to BUTINA of American individuals and noted that this list would serve as “a good start for Maria’s first briefing for [the RUSSIAN OFFICIAL’s] Friday morning in Moscow.” BUTINA expressed her gratitude to U.S. Person 1 and noted that she had received the list before her meeting with the RUSSIAN OFFICIAL, and “that [w]e confirm the Dates! [the RUSSIAN OFFICIAL] is working on the best third person from the Russian side now.” Additionally, BUTINA told U.S. Person 2 that the RUSSIAN OFFICIAL had expressed to her that he was “very much impressed by you and expresses his great appreciation for what you are doing to restore relations between the two countries. He also wants you to know that Russians will support the efforts from our side. That is all I can tell you for now. More information next week!”

28. On March 14, 2016, BUTINA emailed U.S. Person 2 and said that the RUSSIAN OFFICIAL confirmed to her “his desire in our Russian-American project,” and that a representative of the Russian Presidential administration had expressed approval “for building this communication channel.” BUTINA additionally assured U.S. Person 2 that he should not worry as “all that we needed is <<yes>> from Putin’s side. The rest is easier.”

29. On March 30, 2016, BUTINA sent an email thanking an associate of the organizer

of the 2017 Prayer Breakfast for meeting with her and the RUSSIAN OFFICIAL in Moscow. In this email, BUTINA noted that the RUSSIAN OFFICIAL “suggested to President Putin that he consider coming to the Prayer Breakfast next year, Feb 2017, and Pres. Putin did not say ‘no’!” BUTINA observed that she believed that there were a number of conditions that should be met in order for President Putin to attend, including a personal invitation from the President of the United States and the attendance of at least fifteen other world leaders or heads of state. In a later March email, the organizer of the 2017 National Prayer Breakfast promised BUTINA he would provide ten seats at the 2017 event.

30. On September 16, 2016, BUTINA sent an email to U.S. Person 1 and U.S. Person 2 regarding organizing another Russian-American “friendship and dialogue” dinner in the District of Columbia. BUTINA suggested scheduling the next dinner at the beginning of October 2016, because “we only have 2 month left before the US elections and it’s the time for building an advisors team on Russia for a new president. I am seriously worry that the candidates some upcoming day will suddenly realize that ‘now’ is the time to do something with Russia and will look for advisory among currently popular radically oppositional to Russia crowd of experts. Bad things happen than. I believe we can prevent it.” [sic]

31. On October 4, 2016, U.S. Person 1 sent an email to an acquaintance. The email covered a number of topics. Within the email, U.S. Person 1 stated, “Unrelated to specific presidential campaigns, I’ve been involved in securing a VERY private line of communication between the Kremlin and key POLITICAL PARTY 1 leaders through, of all conduits, the [GUN RIGHTS ORGANIZATION].” Based on my training, experience, and familiarity with this investigation, I believe that this email describes U.S. Person 1’s involvement in BUTINA’s efforts to establish a “back channel” communication for representatives of the Government of Russia.

32. On October 5, 2016, BUTINA and the RUSSIAN OFFICIAL exchanged the

following direct messages on Twitter:

BUTINA: Time will tell. We made our bet. I am following our game. I will be connecting the people from the prayer breakfast to this group. Most importantly, you get better. Everything else we will win.

RUSSIAN OFFICIAL: No doubt! Of course we will win, but I (you are right) need to beat the illness first and get out of the hospital (I made an attempt today – it didn't work). And it is not about winning today's fight (although we are striving for it) but to win the entire battle. This is the battle for the future, it cannot be lost! Or everyone will lose.

BUTINA: True! But don't try to get out right now: the doctors ordered you to stay for a reason. Better finish the treatment. Please do not risk it. You have a key role and you know it. I will not manage without you.

RUSSIAN OFFICIAL: No! This is a mistake. Your political star has risen in the sky. Now it is important to rise to the zenith and not burn out (fall) prematurely.

BUTINA: Oh well. I am just starting in this field. I still have to learn and learn from you! These are not just words! Harsh and impetuous moves will ruin everything early.

RUSSIAN OFFICIAL: This is hard to teach. Patience and cold blood + faith in yourself. And everything will definitely turn out.

* * *

BUTINA: By your recommendation, I am setting up the groundwork here but I am really in need of mentoring. Or the energy might to towards the wrong direction. Yesterday's dinner showed that American society is broken in relation to Russia. This is now the dividing line of opinions, the crucial one in the election race. [POLITICAL PARTY 1] are for us, [another major U.S. political party] – against – 50/50. Our move here is very important.” [sic]

33. During the October 5, 2016 Twitter direct communications, BUTINA and the RUSSIAN OFFICIAL also discussed other potential steps to take in the operation. The RUSSIAN OFFICIAL asked about how the “Russia-USA friendship society” looked at that time. BUTINA responded, “It's not alive. We are currently ‘underground’ both here and there. Now, private clubs and quite [sic] influence on people making decisions is the trend. No publicity.” She

continued, “Advisor – is the profession of the current day. Even a secret advisor. Right now the Administration here is flexible – and there is the idea, so that the right thoughts would dominate.”

34. Following this October 5, 2016 Twitter conversation, BUTINA and the RUSSIAN OFFICIAL discussed whether BUTINA should volunteer to serve as a U.S. election observer from Russia and agreed that the risk was too high. The RUSSIAN OFFICIAL expressed the opinion that “the risk of provocation is too high and the ‘media hype’ which comes after it,” and BUTINA agreed by responding, “Only incognito! Right now everything has to be quiet and careful.”

35. In October 2016, BUTINA and the RUSSIAN OFFICIAL intermittently communicated to discuss the topics of the 2017 National Prayer Breakfast invitation and the upcoming elections via Twitter direct message. On October 17, 2016, BUTINA asked the RUSSIAN OFFICIAL for a list of ten individuals from Russia who would be attending the National Prayer Breakfast. BUTINA further suggested to the RUSSIAN OFFICIAL that it would be a good idea to invite the Russian Ambassador and noted that it “needs to be somebody influential from Russia, it would be better [if it were someone] from the Kremlin or RPC [Russian Orthodox Church] of course.”

36. In a series of November 8 and 9, 2016 Twitter direct messages, the RUSSIAN OFFICIAL and BUTINA discussed the results of the U.S. Presidential election as they were announced. As part of that same Twitter conversation, BUTINA told the RUSSIAN OFFICIAL, “. . . I’m going to sleep. It’s 3 am here. I am ready for further orders.” The RUSSIAN OFFICIAL responded, “Think about in which areas of life we could go towards bringing us closer. ISIS – understandably, what else we need to look at the American agenda.” After speculating about who might be nominated as Secretary of State, BUTINA suggested a phone call to discuss, and the RUSSIAN OFFICIAL noted that he liked the idea, but was worried that “all our phones are being listened to!” BUTINA suggested that they talk via WhatsApp.

37. On November 11, 2016, BUTINA sent the RUSSIAN OFFICIAL a direct message via Twitter, in which she predicted who might be named Secretary of State and asked the RUSSIAN OFFICIAL to find out how “our people” felt about that potential nomination.

38. Also on November 11, 2016, BUTINA sent the RUSSIAN OFFICIAL a direct message via Twitter which included a screen shot of two “reports” in Russian. One report proposed ways to establish dialogue with U.S. politicians through a conference. The proposal stated that “[t]he conference must be presented as a private initiative, not a government undertaking.” The proposal also suggested that BUTINA and a number of political officials and U.S. Congressmen should participate. In this report, BUTINA noted to the RUSSIAN OFFICIAL, under the heading “advantages,” that “[t]he event will get wide coverage in the press; it will be the first positive event regarding Russia in Washington (currently, all of them are anti-Russian and anti-Putin). The event does not pose any risks because no government officials from either country will attend; yet it creates a foundation for further talks on the level of government officials.”

39. In a November 12, 2016 Twitter direct message, the RUSSIAN OFFICIAL acknowledged reading the proposal referenced above and informed BUTINA that “they” won’t go for it. He told BUTINA that he could not reach an MFA contact and noted “[p]eople are waiting for the formed decisions. I will try to clarify this subject on Monday one more time.” Based on my training, experience, and familiarity with this investigation, I believe these messages are the RUSSIAN OFFICIAL relaying the Russian Federation’s instructions to its agent, BUTINA.

40. On November 30, 2016, BUTINA emailed U.S. Person 1 regarding the Russian delegation to the 2017 National Prayer Breakfast. BUTINA stated that the “[p]eople in the list are handpicked by [the RUSSIAN OFFICIAL] and me and are VERY influential in Russia. They are coming to establish a back channel of communication... Let’s think if our [U.S. Person 2’s first name] would like to meet with them...” (ellipses in original)

41. On December 1, 2016, U.S. Person 1 emailed BUTINA with instructions for “what is required to book the Russian delegation hotel rooms in the Washington Hilton – the actual venue of the National Prayer Breakfast.” The email listed rooms and prices, and U.S. Person 1 noted, “To be safe, I’d ask [the RUSSIAN OFFICIAL] to place US \$3500 on one of your Russian charge cards in order to pay these deposits.”

42. In a December 26, 2016 email, the RUSSIAN OFFICIAL told BUTINA that the MFA had no objection to his trip to attend the National Prayer Breakfast, but “it does not mean that everything is settled. . . . Officially, only ambassadors will be invited. There will be no state leaders and delegations.” BUTINA replied, “The response from the MFA is perfect.[] I am serious.”

43. On January 5, 2017, BUTINA was forwarded a copy of an email between U.S. Person 1 and U.S. Person 2 regarding the 2017 National Prayer Breakfast in which U.S. Person 1 attached a list of Russian visitors, including 12 Russian guests, noting, “In addition to delegation leader [the RUSSIAN OFFICIAL], the list is populated by important political advisors to Russian President Putin, university presidents, mayors, and substantial private businessmen.”

44. On January 26, 2017, BUTINA and the RUSSIAN OFFICIAL communicated via Twitter direct message about the RUSSIAN OFFICIAL delivering a speech the night before the National Prayer Breakfast. BUTINA told the Russian Representative that “[t]he only thing I ask is to somehow mention me. This is very important for me for negotiations with the breakfast committee. They need to see me not as the delegation ‘organization committee’ but as your partner and colleague.” The Russian Representative agreed as to the “need to stress [BUTINA’s] status as a key figure.”

45. On February 2, 2017, BUTINA and the RUSSIAN OFFICIAL attended the 2017 National Prayer Breakfast in the District of Columbia.

46. On February 6, 2017, BUTINA emailed a National Prayer Breakfast organizer to thank him for “the gift of you [sic] precious time during the National Prayer Breakfast week – and for the very private meeting that followed. A new relationship between two countries always begins better when it begins in faith. Once you have a chance to rest after last week’s events, I have *important information for you to further* this new relationship. I would appreciate one brief additional meeting with you to explain these new developments. I remain in Washington, D.C. pursuing my Master’s Degree at American University. My schedule is your schedule!” (emphasis added)

48. On February 8, 2017, BUTINA emailed U.S. Person 2 to thank him and noted, “Our delegation cannot stop chatting about your wonderful dinner. My dearest President has received ‘the message’ about your group initiatives and your constructive and kind attention to the Russians.”

49. 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.

CONCLUSION

50. For the reasons stated above, there is probable cause to believe that BUTINA conspired with one or more persons to violate 18 U.S.C. § 951, in violation of 18 U.S.C. § 371.

51. I declare under the penalty of perjury that the information provided above is true and correct to the best of my knowledge.

Respectfully submitted,

KEVIN HELSON
Special Agent

Federal Bureau of Investigation

Subscribed and sworn to before me
on

THE HONORABLE DEBORAH A. ROBINSON
UNITED STATES MAGISTRATE JUDGE