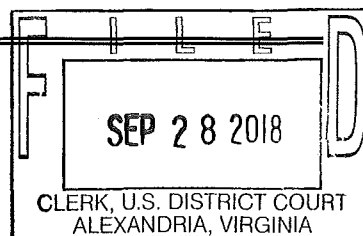


UNDER SEAL
UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



United States of America

v.

Case No. 1:18-MJ-464

ELENA ALEKSEEVNA KHUSYAYNOVA

*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 the year 2014 until the present in the county of Alexandria in the
Eastern District of Virginia, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 371

Conspiracy to defraud the United States

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

AUSA Jay Prabhu; SAUSA Alex Iftimie

A handwritten signature in cursive script, appearing to read "David Holt".

Complainant's signature

David Holt, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

28 Sep 18

City and state:

Alexandria, Virginia

A handwritten signature in cursive script, appearing to read "Ivan D. Davis".

/s/

Ivan D. Davis

United States Magistrate Judge

FILED
SEP 28 2018
CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

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FBI and other law enforcement officers, court records and documents, business records, interviews, publicly available information, and my review of physical and documentary evidence. I have personally participated in the investigation of the offense set forth below and, as a result of my participation and review of evidence gathered in the case, I am familiar with the facts and circumstances of this investigation. Since this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, I have not included every fact resulting from the investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the above-named defendant has violated Title 18, United States Code, Section 371, as set forth herein.

RELEVANT STATUTES AND BACKGROUND

4. Title 18, United States Code, Section 371, makes it a federal crime if “two or more persons conspire . . . to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy.”

5. The United States of America, through its departments and agencies, regulates the activities of foreign individuals and entities in and affecting the United States in order to prevent, disclose, and counteract improper foreign influence on U.S. elections and on the U.S. political system. U.S. law bans foreign nationals from making certain expenditures or providing things of value for the purpose of influencing federal elections. U.S. law also bars agents of any foreign entity from engaging in political activities within the United States without first registering with the Attorney General. Various federal agencies, including the U.S. Department of Justice and the Federal Election Commission, are charged with enforcing these laws.

6. The U.S. Department of Justice administers the Foreign Agent Registration Act (“FARA”), Title 22, United States Code, Section 611 *et seq.* FARA establishes a registration, reporting, and disclosure regime for agents of foreign principals (which includes foreign non-government individuals and entities) so that the U.S. government and the people of the United States are informed of the source of information and the identity of persons attempting to influence U.S. public opinion, policy, and law. FARA requires, among other things, that persons subject to its requirements submit periodic registration statements containing truthful information about their activities and the income earned from them. Disclosure of the required information allows the federal government and the American people to evaluate the statements and activities of such persons in light of their function as foreign agents.

7. The Federal Election Commission is a federal agency that administers the Federal Election Campaign Act (“FECA”). Among other things, FECA prohibits foreign nationals from making “a contribution or donation of money or other thing of value, or to make an express or implied promise to make a contribution or donation, in connection with a Federal, State, or local election.” 52 U.S.C. § 30121(a)(1)(A). FECA also requires that individuals or entities who make certain independent expenditures in federal elections report those expenditures to the Federal Election Commission. The reporting requirements permit the Federal Election Commission to fulfill its statutory duties of providing the American public with accurate data about the financial activities of individuals and entities supporting federal candidates, and enforcing FECA’s limits and prohibitions, including the ban on foreign expenditures.

STATEMENT OF PROBABLE CAUSE

I. Project Lakhta and Efforts to Interfere with U.S. Political System

8. Since at least 2014, known and unknown individuals, operating as part of a broader Russian effort known as “Project Lakhta,” have engaged in political and electoral interference operations targeting populations within the Russian Federation and in various other countries, including, but not limited to, the United States, members of the European Union, and Ukraine. Since at least May 2014, Project Lakhta’s stated goal in the United States was to spread distrust towards candidates for political office and the political system in general.

9. Beginning in or around mid-2014 and continuing to the present, Project Lakhta obscured its conduct by operating through a number of Russian entities, including Internet Research Agency LLC (“IRA”), Internet Research LLC, MediaSintez LLC, GlavSet LLC, MixInfo LLC, Azimut LLC, NovInfo LLC, Nevskiy News LLC (a/k/a “NevNov”), Economy Today LLC, National News LLC, Federal News Agency LLC (a/k/a “FAN”), and International News Agency LLC (a/k/a “MAN”). These entities employed hundreds of individuals in support of Project Lakhta’s operations with an annual global budget of millions of U.S. dollars. Only some of Project Lakhta’s activities were directed at the United States.

10. Concord Management and Consulting LLC and Concord Catering (collectively “Concord”) are related Russian entities with various Russian government contracts. Concord was the primary source of funding for Project Lakhta operations. Concord controlled funding, recommended personnel, and oversaw Project Lakhta activities through reporting and interaction with the management of the various Project Lakhta entities.

11. Yevgeniy Viktorovich Prigozhin is a Russian oligarch who is closely identified with Russian President Vladimir Putin. Prigozhin began his career in the food and restaurant

business and is sometimes referred to as “Putin’s Chef.” Prigozhin controls Concord, which has been paid by the Russian government to feed school children and the military. Concord and Prigozhin spent significant funds to further the Project Lakhta operations.

12. On February 16, 2018, a grand jury in the District of Columbia returned an indictment charging thirteen Russian nationals and three Russian companies, including Prigozhin, the IRA, and Concord, with committing federal crimes while seeking to interfere with U.S. elections and political processes, including the 2016 presidential election. Indictment, *United States v. Internet Research Agency, et al.*, 1:18-CR-32 (DLF) (D.D.C. Feb. 16, 2018). Based on my training and experience, the factual allegations in that indictment provide further probable cause to believe that the above-named defendant has violated Title 18, United States Code, Section 371. That indictment is attached hereto and incorporated by reference.

II. ELENA ALEKSEEVNA KHUSYAYNOVA

13. Defendant ELENA ALEKSEEVNA KHUSYAYNOVA is a resident of St. Petersburg, Russia. Since at least 2014, the defendant has been employed by various entities within Project Lakhta, including the IRA, GlavSet, and the Federal News Agency. Since approximately April 2014, she has acted as the Chief Accountant in Project Lakhta’s finance department. As detailed further herein, KHUSYAYNOVA oversaw all aspects of Project Lakhta financing. She managed the budgeting and payment of expenses associated with social media operations, web content, advertising campaigns, infrastructure, salaries, travel, office rent, furniture, and supplies, and the registration of legal entities used to further Project Lakhta activities.

14. There is probable cause to believe that, from at least 2014 to the present, KHUSYAYNOVA conspired with persons known and unknown to defraud the United States by

impairing, obstructing, and defeating the lawful functions of the U.S. Department of Justice and Federal Election Commission in administering federal requirements for disclosure of foreign involvement in certain domestic activities, in violation of Title 18, United States Code, Section 371. Among the persons with whom KHUSYAYNOVA conspired are known and unknown employees and associates of Concord and Project Lakhta entities. The Conspiracy had as its objects impairing, obstructing, and defeating the lawful governmental functions of the United States by dishonest means in order to enable Project Lakhta actors to interfere with U.S. political and electoral processes, including the 2018 U.S. elections.

III. Manner and Means of the Conspiracy

15. The Conspiracy has a strategic goal, which continues to this day, to sow division and discord in the U.S. political system, including by creating social and political polarization, undermining faith in democratic institutions, and influencing U.S. elections, including the upcoming 2018 midterm election. The Conspiracy has sought to conduct what it called internally “information warfare against the United States of America”¹ through fictitious U.S. personas on social media platforms and other Internet-based media.

16. Members of the Conspiracy, posing as U.S. persons, operated fictitious social media personas, pages, and groups designed to attract U.S. audiences and to address divisive U.S. political and social issues or advocate for the election or electoral defeat of particular candidates. These personas, groups, and pages falsely claimed to be controlled by U.S. activists when, in fact, they were controlled by members of the Conspiracy. Over time, these accounts

¹ Throughout this affidavit, statements by members of the Conspiracy are translated or quoted exactly as they appear in the source text, including any spelling, grammatical, or factual errors.

became the Conspiracy's primary means to reach significant numbers of Americans for purposes of interfering with the U.S. political system.

17. Members of the Conspiracy made various expenditures to carry out those activities, including buying social media analytics products and services, as well as advertisements on social media, in some instances through third-party intermediaries. Members of the Conspiracy also staged and promoted political rallies inside the United States, and while posing as U.S. grassroots entities and U.S. persons, and without revealing their Russian identities and Project Lakhta affiliation, promoted or disparaged candidates and campaigns and organized rallies and counter-protests around particular socially divisive issues.

A. KHUSYAYNOVA's Role in Project Lakhta

18. To effectively manage such a large-scale operation, the Conspiracy was headed by a management group and organized into departments, including a design and graphics department, an analysts department, a search-engine optimization ("SEO") department, an information-technology ("IT") department, and a finance department.

19. Between April 2014 and the present, KHUSYAYNOVA, as the Chief Accountant in Project Lakhta's finance department, managed the financing of substantially all aspects of Project operations, which included media and influence activities directed at the United States, the European Union, and Ukraine, as well as the Russian Federation. In that role, she oversaw the budgets of various Project Lakhta entities, including the IRA, MediaSintez LLC, GlavSet LLC, MixInfo LLC, Azimut LLC, NovInfo LLC, Nevskiy News LLC, Economy Today LLC, National News LLC, Federal News Agency LLC, and International News Agency LLC. KHUSYAYNOVA participated in the preparation and submission of hundreds of financial vouchers, budgets, and payment requests for the various Project Lakhta entities, often putting all

company names on the same paperwork and identifying them as part of Project Lakhta.

KHUSYAYNOVA maintained Project Lakhta monthly budgets and submitted associated requests for funds to the central finance offices of Concord, which were responsible for disbursing money to Project Lakhta entities.

20. To conceal the nature of Project Lakhta activities, since at least January 2016 the Conspiracy labeled the funds paid by Concord to Project Lakhta as payments related to software support and development. Moreover, since at least January 2016, Concord distributed funds to Project Lakhta through approximately fourteen bank accounts held in the names of Concord affiliates, including Glavnaya Liniya LLC, Mercuriy LLC, Obshchepit LLC, Potentsial LLC, RSP LLC, ASP LLC, MTTs LLC, Kompleksservis LLC, SPb Kulinariya LLC, Almira LLC, Pishchevik LLC, Galant LLC, Rayteks LLC, and Standart LLC. The Conspiracy described payments from these Concord entities to Project Lakhta as being in furtherance of a series of vague contracts that obscured or falsely stated the true intended use of the funds. At various times, such payments were described as being for “providing services to collect and process materials,” “providing services in developing an exporting module for results,” and “providing services for developing a statistical processing module” (preliminary translation of Russian text).

21. At the same time, KHUSYAYNOVA kept detailed financial documents that tracked itemized Project Lakhta expenses, including efforts to promote the illegal objects of the Conspiracy in the United States. For example, the financial documents included itemized budgets that included IT expenses, social media marketing expenses, and expenses for activities in the United States and the European Union, including expenditures for activists and advertisements on social media platforms. KHUSYAYNOVA also issued and kept track of requests to Concord for funds to cover those expenses. Between at least January 2016 and July

2018, these documents were updated and provided to Concord on approximately a monthly basis. The following illustrative examples demonstrate KHUSYAYNOVA's meticulous record-keeping and management of Project Lakhta funds:

- a. In or around January 2017, KHUSYAYNOVA compiled and submitted to Concord a planned itemized budget for February 2017 for Project Lakhta totaling approximately 60 million Russian rubles (approximately \$1 million U.S. dollars).² This budget also contained a backward-looking accounting of actual expenses for calendar year 2016, which totaled approximately 720 million Russian rubles (approximately \$12 million U.S. dollars). In addition to administrative expenses, such as office rent, utility payments, and garbage disposal, the budget identified IT expenses, such as "registration of domain names" and the purchase of "proxy servers;" and social media marketing expenses, such as expenses for "purchasing posts for social networks," "[a]dvertisement on Facebook," "[a]dvertisement on VKontakte," "[a]dvertisement on Instagram," "[p]romoting news postings on social networks," and social media optimization software (such as Twidium and Novapress) (preliminary translation of Russian text). The budgets also contained a section on "USA, EU" activities, which included itemized expenditures for "Instagram," "Facebook advertisement," and "Activists" (preliminary translation of Russian text). Moreover, the budgets identified expenditures for "bloggers" and "developing accounts" on Twitter, and for the development and promotion of online videos (preliminary translation of Russian text).

² For the purpose of this affidavit, the approximate U.S. dollar values are based on an approximate currency conversion rate of 60 Russian rubles to 1 U.S. dollar.

- b. To cover the February 2017 expenses, KHUSYAYNOVA requested funds from Concord in two parts. KHUSYAYNOVA requested approximately 25 million Russian rubles on or about February 16, 2017, and approximately 35 million Russian rubles on March 6, 2017.
- c. In or around January 2018, KHUSYAYNOVA compiled and submitted to Concord a planned itemized budget for February 2018 totaling approximately 100 million Russian rubles (approximately \$1.7 million U.S. dollars). This budget also contained a backward-looking accounting of actual expenses for calendar year 2017, which totaled approximately 733 million Russian rubles (approximately \$12.2 million U.S. dollars). The budget contained, among other things, all of the categories of itemized expenditures identified in subparagraph a, above.
- d. To cover substantial portions of the February 2018 expenses, KHUSYAYNOVA requested funds from Concord in at least six parts. KHUSYAYNOVA requested approximately 20 million Russian rubles on or about February 7, 2018, approximately 10 million Russian rubles on or about February 7, 2018, approximately 15 million Russian rubles on or about February 16, 2018, approximately 3 million Russian rubles on or about February 21, 2018, approximately 5 million Russian rubles on or about February 28, 2018, and approximately 31 million Russian rubles on or about March 6, 2018.
- e. In or around March 2018, KHUSYAYNOVA compiled and submitted to Concord a monthly budget for April 2018 for Project Lakhta that exceeded 107 million

Russian rubles (over \$1.75 million U.S. dollars). The budget contained, among other things, all of the itemized expenditures identified in subparagraph a, above.

- f. To cover substantial portions of the April 2018 expenses, KHUSYAYNOVA requested funds from Concord in at least two parts. KHUSYAYNOVA requested approximately 32 million Russian rubles on or about April 6, 2018, and approximately 21 million Russian rubles on or about May 8, 2018.
- g. In or around April 2018, KHUSYAYNOVA compiled and submitted to Concord a monthly budget for May 2018 for Project Lakhta that exceeded 111 million Russian rubles (over \$1.86 million U.S. dollars). The budget contained, among other things, all of the categories of itemized expenditures identified in subparagraph a, above.
- h. To cover substantial portions of the May 2018 expenses, she requested funds from Concord in at least three parts. She requested approximately 5 million Russian rubles on or about May 8, 2018, approximately 31 million Russian rubles on or about May 10, 2018, and approximately 35 million Russian rubles on or about June 9, 2018.
- i. On or about June 1, 2018, KHUSYAYNOVA compiled and submitted to Concord a monthly budget for June 2018 for Project Lakhta that exceeded 114 million Russian rubles (over \$1.9 million U.S. dollars). The budget contained, among other things, all of the categories of itemized expenditures identified in subparagraph a, above.
- j. To cover substantial portions of the June 2018 expenses, KHUSYAYNOVA requested funds from Concord in three parts. KHUSYAYNOVA requested

approximately 29 million Russian rubles on or about June 1, 2018, approximately 29 million Russian rubles on or about June 4, 2018, and approximately 36 million Russian rubles on July 10, 2018.

22. Between in or around January 2016 and in or around June 2018, Project Lakhta's proposed operating budget totaled more than 2 billion Russian rubles (over \$35 million U.S. dollars). Just between in or around January 2018 and in or around June 2018, Project Lakhta's proposed operating budget totaled more than 650 million Russian rubles (over \$10 million U.S. dollars).

23. KHUSYAYNOVA also monitored the Project Lakhta budget to ensure that expected payments from Concord were received. For example, on or about November 15, 2017, KHUSYAYNOVA contacted Concord to inform them that she had not received a payment from Almira LLC for certain Project Lakhta companies, and that she was urgently waiting for the payment. Similarly, on or about April 11, 2018, KHUSYAYNOVA confirmed to Concord that she had received payment for a portion of the March 2018 budget for Project Lakhta but was waiting for the remaining payment. On or about April 12, 2018, a Concord employee informed KHUSYAYNOVA that the remaining payment would be forthcoming.

24. Starting at least in or around 2015, the Conspiracy began to purchase advertisements on online social media sites to promote events and social media groups it controlled. These expenditures were included in the budgets that KHUSYAYNOVA submitted to Concord. For example, between approximately January 2018 and June 2018, KHUSYAYNOVA compiled and submitted to Concord expenditures of over 3.7 million Russian rubles (over \$60,000 U.S. dollars) for advertisements on Facebook and over 385,000 Russian rubles (over \$6,000 U.S. dollars) for advertisements on Instagram. Over that same timeframe,

the budget also included expenditures of over 1,100,000 Russian rubles (over \$18,000 U.S. dollars) for “bloggers” and “[d]eveloping accounts” on Twitter (preliminary translation of Russian text). Additionally, the budget included expenditures for “[r]enting software for social networks,” including payments for services to manage Twitter posts and generate additional followers (preliminary translation of Russian text).

B. Targeted Messaging to Sow Social and Political Discord

25. Between in or around December 2016 and in or around May 2018, as part of the Conspiracy’s effort to sow discord in the U.S. political system, members of the Conspiracy used social media and other internet platforms to inflame passions on a wide variety of topics, including immigration, gun control and the Second Amendment, the Confederate flag, race relations, LGBT issues, the Women’s March, and the NFL national anthem debate. Members of the Conspiracy took advantage of specific events in the United States to anchor their themes, including the shootings of church members in Charleston, South Carolina, and concert attendees in Las Vegas, Nevada; the Charlottesville “Unite the Right” rally and associated violence; police shootings of African-American men; as well as the personnel and policy decisions of the current U.S. administration.

26. Members of the Conspiracy were directed to create “political intensity through supporting radical groups, users dissatisfied with [the] social and economic situation and oppositional social movements.” The Conspiracy also sought, in the words of one member of the Conspiracy, to “effectively aggravate the conflict between minorities and the rest of the population.”

27. The Conspirators’ activities did not exclusively adopt one ideological viewpoint; they wrote on topics from varied and sometimes opposing perspectives. Members of the

Conspiracy also developed strategies and guidance to target audiences with conservative and liberal viewpoints, as well as particular social groups. For example, a member of the Conspiracy advised in or around October 2017 that “if you write posts in a liberal group, . . . you must not use Breitbart titles. On the contrary, if you write posts in a conservative group, do not use Washington Post or BuzzFeed’s titles.” Using the example of individuals of color who are also members of the lesbian, gay, bisexual, and transgender (“LGBT”) community, the member of the Conspiracy offered the following guidance on how to target the group:

Colored LGBT are less sophisticated than white; therefore, complicated phrases and messages do not work. Be careful dealing with racial content. Just like ordinary Blacks, Latinos, and Native Americans, colored LGBT people are very sensitive towards *#whiteprivilege* and they react to posts and pictures that favor white people. . . . Unlike with conservatives, infographics works well among LGBT and their liberal allies, and it does work very well. However, the content must be simple to understand consisting of short text in large font and a colorful picture. (Preliminary translation of Russian text.)

Members of the Conspiracy also sought to target the timing of their posts to attract the widest possible viewership. The same member of the Conspiracy referenced above offered the following guidance on how to overcome the time difference between Russia and the United States:

Posting can be problematic due to time difference, but if you make your re-posts in the morning St. Petersburg time, it works well with liberals – LGBT groups are often active at night. Also, the conservative can view your re-post when they wake up in the morning if you post it before you leave in the evening St. Petersburg time. (Preliminary translation of Russian text.)

28. Members of the Conspiracy also developed detailed analysis of timely news articles and guidance for how to describe the articles in social media posts in order to promote the objectives of the Conspiracy. For example, in or around early August 2017, one or more members of the Conspiracy working under the guise of the Facebook group “Secured Borders”

analyzed a large quantity of U.S. news articles, summarized the substance of the articles, and outlined ways for the conspiracy to promote them. Specifically, one or more members of the Conspiracy described each article and categorized its theme, provided a strategic response with a particular focus on how to target U.S. audiences, and then noted approval to use the strategic response. The strategic response was referred to as “Tasking Specifics,” which appeared to include an assignment to certain members of the Conspiracy to disseminate the message on social media platforms.

- a. Citing an online news article titled “McCain Says Thinking a Wall Will Stop Illegal Immigration is ‘Crazy,’” from on or about August 5, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

Brand McCain as an old geezer who has lost it and who long ago belonged in a home for the elderly. Emphasize that John McCain’s pathological hatred towards Donald Trump and towards all his initiatives crosses all reasonable borders and limits. State that dishonorable scoundrels, such as McCain, immediately aim to destroy all the conservative voters’ hopes as soon as Trump tries to fulfill his election promises and tries to protect the American interests. (Preliminary translation of Russian text.)

- b. Citing an online news article titled “Paul Ryan Opposes Trump’s Immigration Cuts, Wants Struggling American Workers to Stay Poor,” from on or about August 5, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

Brand Paul Ryan a complete and absolute nobody incapable of any decisiveness. Emphasize that while serving as Speaker, this two-faced loudmouth has not accomplished anything good for America or for American citizens. State that the only way to get rid of Ryan from Congress, provided he wins in the 2018 primaries, is to vote in favor of Randy Brice, an American veteran and an iron worker and a Democrat. (Preliminary translation of Russian text.)

- c. Citing an online news article titled “11 California Counties Might have More Registered Voters Than Eligible,” from on or about August 6, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

In the California voter registration rolls, there are more registrants than there are residents. This is the time for American conservatives to sound the alarm before the elections turn the Constitution into a mockery and a celebration of lawlessness. Emphasize that previous falsifications during the U.S. elections used to be perceived as a myth; today they became a reality with a threatening force and are perceived accordingly. Emphasize that all illegal voters must be kept away from the ballot boxes at distances “beyond artillery firing range.” There is an urgent need to introduce voter IDs for all the states, above all in the blue (liberal and undecided) states. Remind that the majority of the “blue states” have no VOTER IDs, which suggests that large-scale falsifications are bound to be happening there. State in the end that the Democrats in the coming election will surely attempt to falsify the results. (Preliminary translation of Russian text.)

- d. Citing an online news article titled “Savage: Civil War if Trump Taken Down,” from on or about August 6, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

Forcefully support Michael Savage’s point of view with competence and honesty. Savage made it clear that any attempt to remove Trump is a direct path to a civil war in the United States. Name those who oppose the president and those who impede his efforts to implement his pre-election promises. Focus on the fact that the Anti-Trump Republicans: a) drag their feet with regard to financing the construction of the border wall; b) are not lowering taxes; c) slander Trump and harm his reputation (bring up McCain); d) do not want to cancel Obamacare; e) are not in a hurry to adopt laws that oppose the refugees coming from Middle Eastern countries entering this country. Summarize that in case Republicans will not stop acting as traitors, they will bring upon themselves forces of civil retribution during the 2018 elections. (Preliminary translation of Russian text.)

- e. Citing an online news article titled “Trump: No Welfare To Migrants For Grants For First 5 Years” from on or about August 6, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

Fully support Donald Trump and express the hope that this time around Congress will be forced to act as the president says it should. Emphasize that if Congress continues to act like the Colonial British government did before the War of Independence, this will call for another revolution. Summarize that Trump once again proved that he stands for protecting the interests of the United States of America. (Preliminary translation of Russian text.)

- f. Citing an online news article titled “The 8 Dirtiest Scandals of Robert Mueller No One Is Talking About,” from on or about August 7, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

Special prosecutor Mueller is a puppet of the establishment. List scandals that took place when Mueller headed the FBI. Direct attention to the listed examples. State the following: It is a fact that the Special Prosecutor who leads the investigation against Trump represents the establishment: a politician with proven connections to the U.S. Democratic Party who says things that should either remove him from his position or disband the entire investigation commission. Summarize with a statement that Mueller is a very dependent and highly politicized figure; therefore, there will be no honest and open results from the investigation. Emphasize that the work of this commission is damaging to the country and is aimed to declare impeachment of Trump. Emphasize that it cannot be allowed, no matter what. (Preliminary translation of Russian text.)

- g. Citing an online news article titled “CNN’s Pro-Jeb! Republican: Trump White House Like a ‘Brothel,’” from on or about August 7, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

CNN commentator “RINO” likened the Trump administration to a “brothel.” Mass News Media Criticism! Accuse CNN of yet another lie. State that during past elections, namely, this mainstream media, which supported Hillary Clinton’s candidacy

for U. S. President almost 100%, disseminated fake news, insulting statements, and lies about Donald Trump and his supporters. This continues now. This is precisely why such news sources as the New York Times, Washington Post, CNN, CBS, Time, and Huffington Post must not be taken seriously, for they are the main propaganda channels that are screwing with the heads of American citizens. Remind readers that each of the above-mentioned media resources supported Hillary Clinton and received funds from her election fund. They produced fake social study research results at polls predicting a Clinton win with a 10-15% lead over Trump and tried hard to insult and discredit Trump. Summarize with a statement that CNN long ago lost its reputation as a trusted source and that its reputation is still declining. (Preliminary translation of Russian text.)

- h. Citing an online news article titled “Pro-Amnesty Sen. Marco Rubio: Trump’s Immigration Bill Will Not Pass the Senate,” from on or about August 7, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

VERY IMPORTANT! We expose Marco Rubio as a fake conservative who is a traitor to Republican values and who in his soul despises the American Constitution and civil liberties. Remind that Rubio is the protégé of the preposterous Jeb Bush, who is a disgrace to the conservative movement. State that victims of violence committed by illegals and the relatives of the victims hate Marco Rubio completely and wholeheartedly. In other words, Rubio is a liberal who penetrated the Republican Party for the purpose undermining it from the inside. Summarize in a statement that voting for Rubio during the Senate elections is practically the same as voting for Hillary Clinton. (Preliminary translation of Russian text.)

- i. Citing an online news article titled “Sanctuary City Objects to Arrest of Accused Illegal Alien Child Molester,” from on or about August 7, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

Characterize the position of Californian sanctuary cities along with the position of the entire California administration as absolutely and completely treacherous and disgusting. Stress that protecting an illegal rapist who raped an American child is the peak of

wickedness and hypocrisy. Summarize in a statement that “sanctuary city” politicians should surrender their American citizenship, for they behave as true enemies of the United States of America. (Preliminary translation of Russian text.)

- j. Citing an online news article titled “Maryland City Mulling Over Idea to Let Illegal Immigrants Vote” from on or about August 7, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

Stress that the leadership in sanctuary cities has lost all connection with reality and is trying to provide criminals who illegally crossed the U.S. borders with voting rights that are available only to the citizens of the United States. Summarize in a statement that the leaders of sanctuary cities are people without conscience and without any respect for the American Constitution. (Preliminary translation of Russian text.)

- k. Citing an online news article titled “Dobbs Slams McConnell, Says It’s Time to ‘Ditch Mitch,’” from on or about August 8, 2017, a member of the Conspiracy directed that the article be messaged in the following way:

It’s time for Mitch McConnell (leader of the Senate Republicans) to retire. Show solid support for the news anchor. Emphasize that McConnell exhausted himself as a politician. State that Mitch McConnell, like many other Republican senators, behaves as a renegade and a vile liberal. McConnell has done nothing to fulfill Trump’s and other Republicans’ election promises. Remind that McConnell is a friend of Joe Biden, who has no political principles. Emphasize that boycotting the conservative agenda is the most inadequate and treacherous behavior possible in the given situation. Summarize in a statement that people did not vote for the Republicans in 2014 and in 2016 so that today they would do the same things that Democrats usually busy themselves with. (Preliminary translation of Russian text.)

C. Use of Specific U.S. Fake Personas

29. Since at least in or around 2015, the Conspiracy used social media platforms to create thousands of social media and email accounts that appeared to be operated by U.S. persons and used them to create and amplify divisive social and political content targeting a U.S.

audience. These accounts were also used to advocate for the election or electoral defeat of particular candidates in the 2016 and 2018 U.S. elections, to post derogatory information about a number of candidates, and, on occasion, to promote political donations against particular candidates.

30. In or around May 2015, the Conspiracy created a Facebook account registered under the false U.S. persona “Helen Christopherson.” On her Facebook page, “Helen Christopherson” purported to be a resident of New York City and identified her hometown as Charleston, South Carolina. Between in or around March 2016 and in or around July 2017, while concealing its true identity, location, and purpose, the Conspiracy used the false U.S. persona “Helen Christopherson” to contact individuals and groups in the United States to promote protests, rallies, and marches, including by funding advertising, flyers, and rally supplies. Specific examples of this account’s activities, as well as the activities of other accounts described in this subsection, are contained in the Overt Acts section below.

31. In or around June 2015, the Conspiracy created a Facebook account registered under the false U.S. persona “Bertha Malone.” On her Facebook page, “Bertha Malone” purported to be a resident of New York City, identified her hometown as New York City, and stated that she had attended a university in New York City. In or around January 2016, the Conspiracy used the “Bertha Malone” Facebook account to create a Facebook page for a group called “Stop A.I.,” which is an abbreviation for “Stop All Invaders.” Between in or around December 2016 and in or around August 2017, while concealing its true identity, location, and purpose, the Conspiracy used the “Bertha Malone” Facebook account to create over 400 posts on Facebook containing inflammatory political and social content focused primarily on immigration and Islam. Between on or about July 17, 2017, and on or about July 23, 2017, alone, the content

on the “Stop A.I.” Facebook page reached approximately 1,385,795 individuals and approximately 130,851 individuals purposefully engaged with the Facebook page. In total, by on or about July 23, 2017, the Facebook page received approximately 194,221 total page likes.

32. The Conspiracy also used the “Bertha Malone” Facebook account, while concealing its true identity, location, and purpose, to solicit at least one person presumed to be located in the United States to assist with Project Lakhta’s social media activities in or around July 2017, such as by posting and managing content on the “Stop A.I.” Facebook page. Moreover, the Conspiracy used the “Stop A.I.” Facebook page to accept money from individuals to post ads and other content on the Facebook group’s page.

33. In or around June 2016, the Conspiracy created a Twitter account that went by various names, including “@UsaUsafortrump,” “@USAForDTrump,” “@TrumpWithUSA,” “@TrumpMov,” “@POTUSADJT,” “@imdeplorable201,” “@swampdrainer659,” “@maga2017trump,” and “@TXCowboysRawk.” Most recently, the Twitter account went by the name “@CovfefeNationUS.” Between in or around November 2017 and in or around December 2017, while concealing its true identity, location, and purpose, the Conspiracy used the Twitter account “@CovfefeNationUS” to post or repost over 23,000 messages.

34. In or around September 2016, the Conspiracy created a Facebook account registered under the false U.S. persona “Rachell Edison” and an associated Facebook page for a group called “Defend the 2nd.” Between in or around December 2016 and in or around May 2017, while concealing its true identity, location, and purpose, the Conspiracy used the “Rachell Edison” Facebook account to create over 700 posts on Facebook containing inflammatory political and social content primarily focused on gun control and the Second Amendment.

35. In or around March 2017, the Conspiracy created the Twitter account “@wokeluisa” registered under the false U.S. persona “Luisa Haynes.” Between in or around March 2017 and in or around March 2018, while concealing its true identity, location, and purpose, the Conspiracy used the Twitter account “@wokeluisa” to post over 2,000 Tweets on topics such as the 2018 midterm election, the disenfranchisement of African-American voters, the NFL national anthem debate, the current U.S. administration, and the U.S. President’s family. By in or around March 2018, the Twitter account amassed over 55,000 followers.

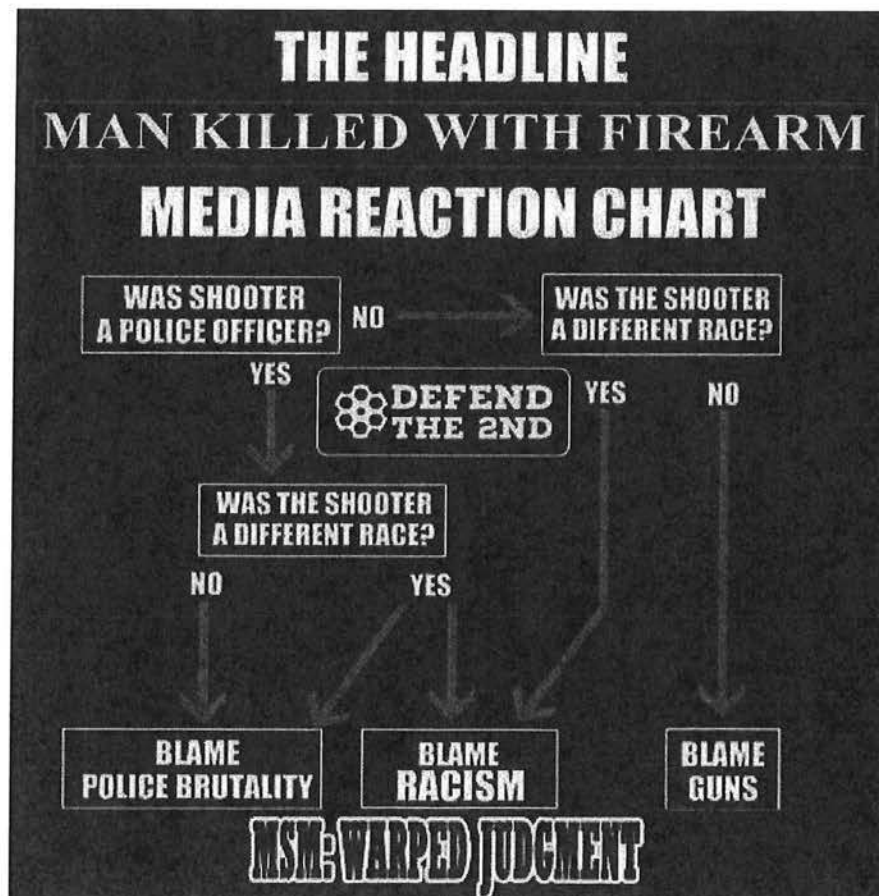
36. In or around September 2017, the Conspiracy created several Twitter accounts that it used to create and amplify content that would resonate with either liberal or conservative audiences. For example, on or about September 4, 2017, one or more members of the Conspiracy created the Twitter accounts “@JohnCopper16,” “@Amconvoice,” and “@TheTrainGuy13.” Members of the Conspiracy used these accounts to post messages on controversial social and political topics using a perspective that they believed would resonate with a conservative audience in the United States. Similarly, one or more members of the Conspiracy created the Twitter account “@KaniJJackson” on or about September 5, 2017, and the Twitter account “@JemiSHaaaZzz” on or about September 6, 2017, and used these accounts to post on many of the same controversial social and political topics from a perspective that they believed would resonate with a liberal audience in the United States. Between in or around September 2017 and in or around May 2018, while concealing its true identity, location, and purpose, the Conspiracy used these Twitter accounts to post thousands of Tweets, on topics including, but not limited to, the 2018 midterm election, gun rights, the net neutrality debate, negotiations with North Korea, and the personnel and policy decisions of the current U.S. administration. In some cases, these accounts attracted significant numbers of followers. For

example, by in or around May 2018, the Twitter account “@KaniJJackson” had amassed over 33,000 followers.

IV. Overt Acts

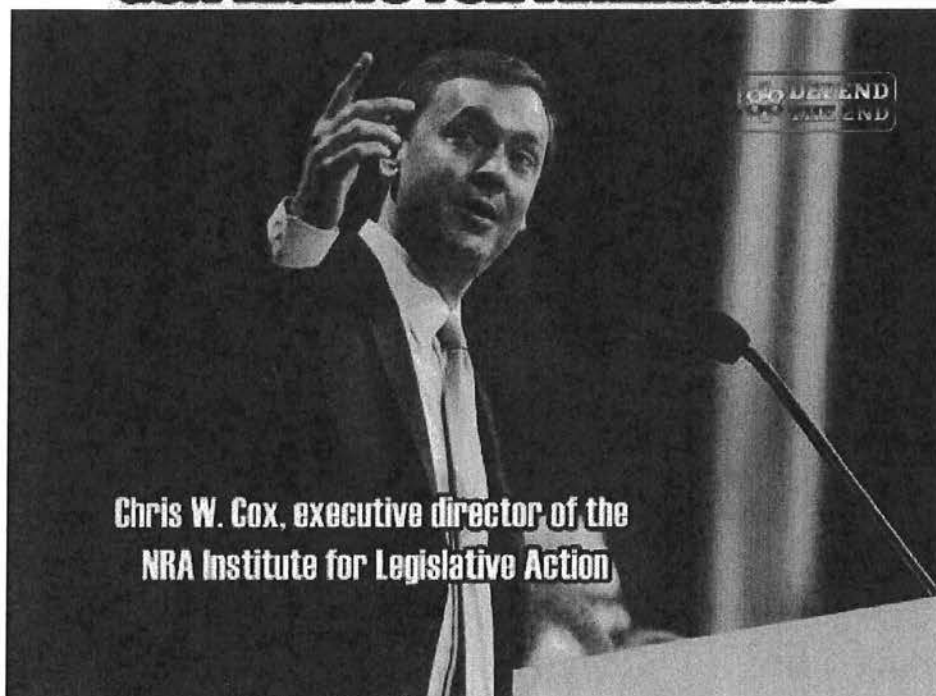
37. Between in or around December 2016 and in or around May 2018, in the Eastern District of Virginia and elsewhere, while concealing its true identity, location, and purpose, the Conspiracy committed the following overt acts involving U.S. social media platforms in furtherance of the Conspiracy and to effect its illegal objects:

38. On or about December 5, 2016, a member of the Conspiracy used the “Rachell Edison” Facebook account to post the following image on Facebook, accompanied by the comment “Whatever happens, blacks are innocent. Whatever happens, it’s all guns and cops. Whatever happens, it’s all racists and homophobes. MainStream Media...”:



39. On or about April 28, 2017, a member of the Conspiracy used the “Rachell Edison” Facebook account to post the following image on Facebook:

NRA DETERMINED TO TURN MAJOR ELECTION WINS INTO PERMANENT GUN RIGHTS FOR AMERICANS



The image was accompanied by the following comment advocating political activities:

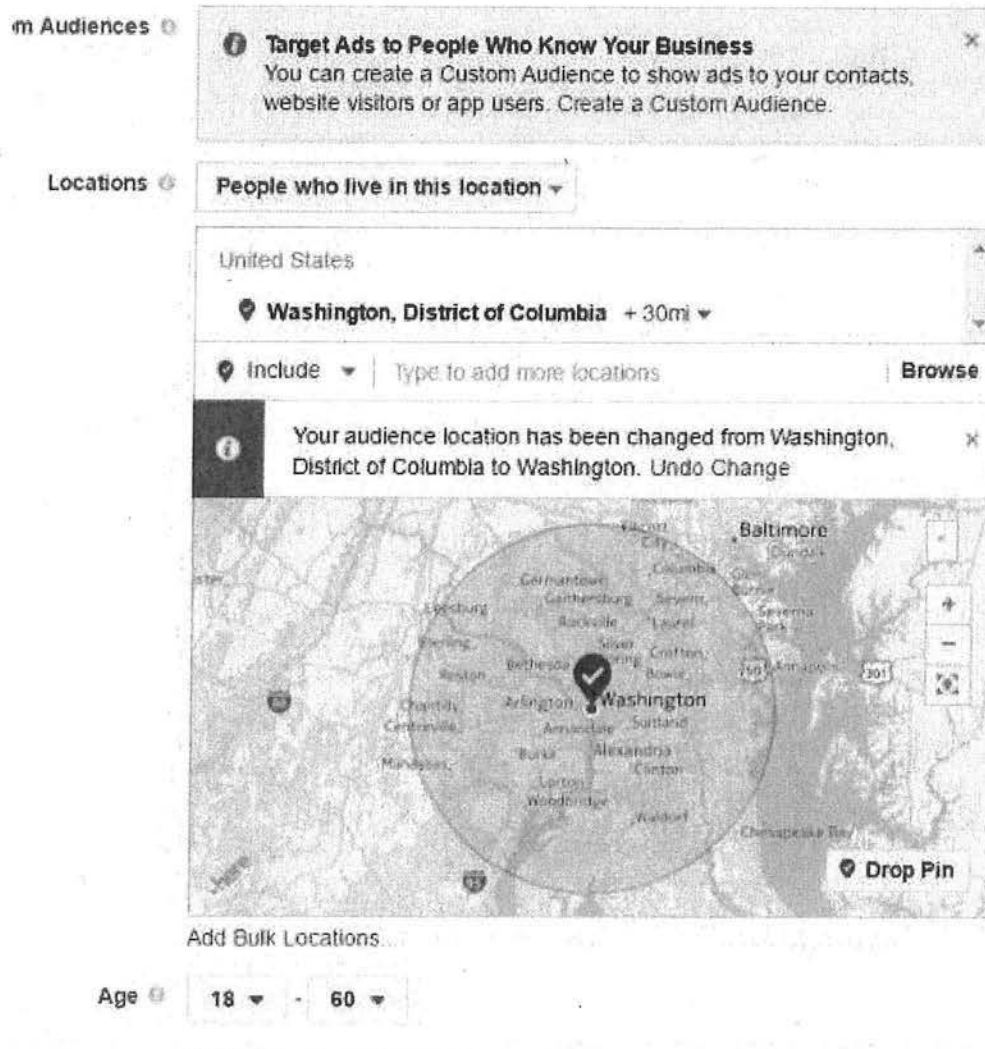
Gun rights backers need to make sure that election victories translate into action on Capitol Hill and expanded support in the states, the National Rifle Association’s legislative chief said Thursday, a day ahead of President Trump’s speech at the NRA’s annual convention. And he is absolutely right. Now it is the time for us to demand our rights. With current, administration it is possible to defend our right to bear arms. I think next 4 years will be great for all Americans, and for gun lovers especially! But we must stand for our rights! And in the end, I believe, we will win!

40. On or about July 1, 2017, a member of the Conspiracy used the “Helen Christopherson” Facebook account to contact the Facebook accounts for three real U.S. organizations (hereinafter U.S. Organizations 1, 2, and 3) to inquire about collaborating with

these groups on an anti-President Trump “flash mob” at the White House, which was already being organized by the groups for July 4, 2017. The organizers had described the event as “inviting resistance activists, show tune lovers, and karaoke fans to come join us on Independence Day, sing a song of freedom, and demand Trump’s impeachment.”

41. On or about July 2, 2017, a member of the Conspiracy used the “Helen Christopherson” Facebook account to contact U.S. Organization 1 and a U.S. person affiliated with the organization, U.S. Person 1, and inform them that “I got some cash on my Facebook ad account so we can promote it for 2 days,” adding “I got like \$80 on my ad account so we can reach like 10000 people in DC or so. That would be Massive!”

42. On or about July 2, 2017, a member of the Conspiracy used the “Helen Christopherson” Facebook account to send U.S. Organization 1 a proposal to purchase advertising targeting individuals within 30 miles of Washington, DC, including significant portions of the Eastern District of Virginia, as depicted below:



The proposed advertisements had an estimated reach of 29,000 to 58,000 individuals. Subsequently, U.S. Organization 1 agreed to make the “Helen Christopherson” Facebook account a co-organizer of the event on Facebook.

43. On or about July 4, 2017, a member of the Conspiracy used the "Bertha Malone" Facebook account to engage in the following conversation with U.S. Person 2 about U.S. Person 2 assisting with posting content and managing the "Stop A.I." Facebook page, which members of the Conspiracy controlled:

Malone: Hey girl! How u doin? still got free time on ya hands?
So...remember u wanted to help me with that page i'm workng
on? It's a little bit unorthodox, but nwm that. Content is not of
my choosing. So what tell ya? Help a sister out?

U.S. Person 2: Hi! Let me think bout 4 a sec.
what's the name of the page again?

Malone: <https://www.facebook.com/StopAllInvaders/>

...

Malone: Nothin muh, [U.S. Person 2]. Just general scannin, answer
subscribers now and then and mb post something (i'll be sending
content to u directly)

Malone: nwm the posts lol

Malone: just business

Malone: makes ratinging for clients, that's what i know.

Malone: ratings*

Malone: u know how rednecks are

Malone: so here's the deal. I give u admin rights, u check the page when
i'm not around and basically do some stuff i tell u to :D

...

U.S. Person 2: You know I can't let my sis down

U.S. Person 2: so I'm in

...

U.S. Person 2: but please tell me I'm not going to jail for this

...

Malone: jeez why would u

Malone: just page lol

Malone: i'll vouch fou 4 mb u get some money out that even

...

U.S. Person 2: i trust you

44. On or about July 28, 2017, a member of the Conspiracy used the “Bertha Malone”

Facebook account to post the following image on Facebook:



The image was accompanied by the following comment:

Instead this stupid witch hunt on Trump, media should investigate this traitor and his plan to Islamize our country. If you are true enemy of America, take a good look at Barack Hussein Obama and Muslim government officials appointed by him.

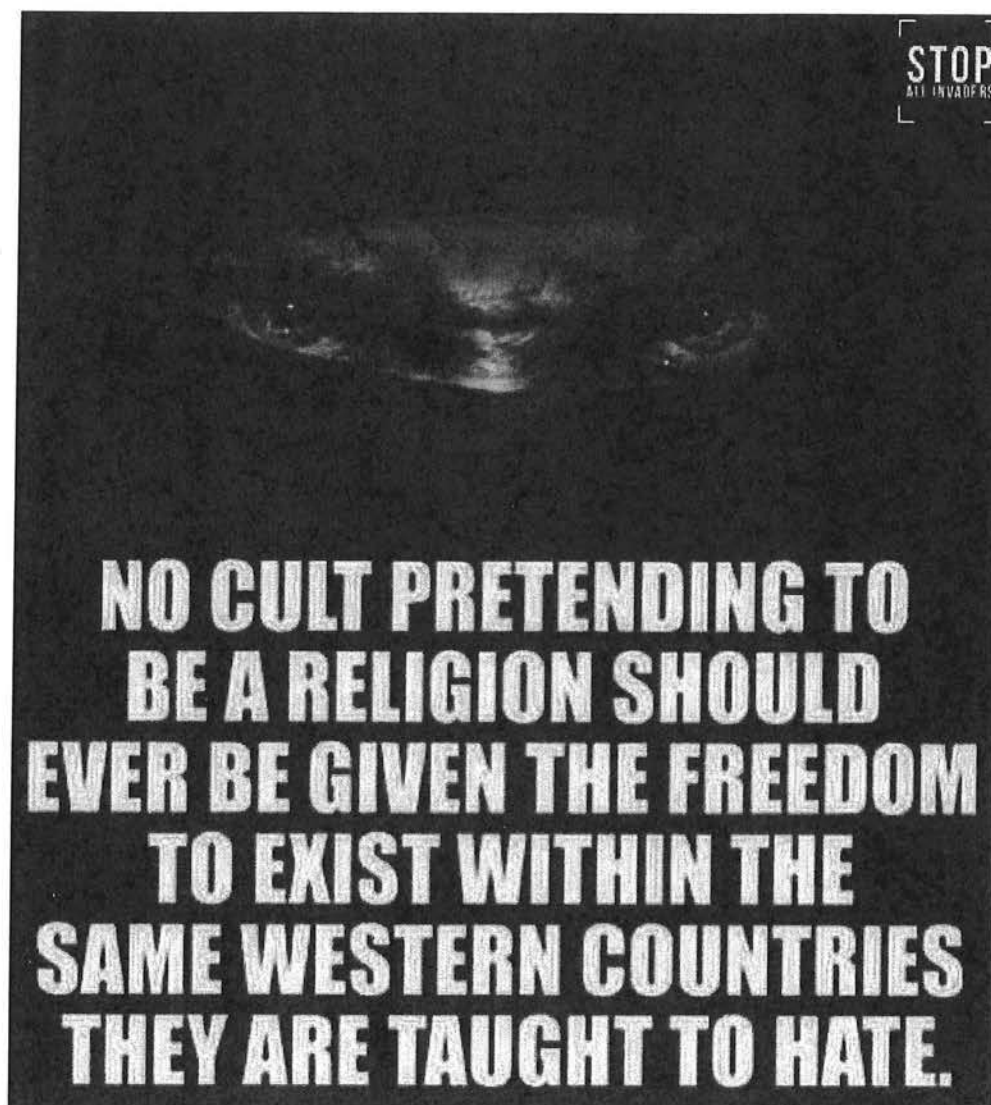
45. On or about July 31, 2017, a member of the Conspiracy used the “Bertha Malone” Facebook account to post the following image on Facebook, with the comment “Stop separating families! Deport them all, including their anchor babies! And spend saved money on Americans who really need it, for example our homeless Vets”:



46. On or about July 31, 2017, a member of the Conspiracy used the “Bertha Malone” Facebook account to post the following image on Facebook, with the comment “Feel the difference!”:



47. On or about August 1, 2017, a member of the Conspiracy used the “Bertha Malone” Facebook account to post the following image on Facebook, with the comment “Damn right! And we all know which cult we need to kick out of America...”:



The post generated approximately 104 comments between on or around August 1, 2017, and on or around August 2, 2017.

48. On or about December 10, 2017, a member of the Conspiracy used the Twitter account “@CovfefeNationUS” to repost a Tweet encouraging readers to donate to a political action committee aiming to unseat Democratic Senators and Representatives in the 2018 midterm election:

Tell us who you want to defeat! Donate \$1.00 to defeat @daveloebsack
Donate \$2.00 to defeat @SenatorBaldwin Donate \$3.00 to defeat
@clairecmc Donate \$4.00 to defeat @NancyPelosi Donate \$5.00 to defeat
@RepMaxineWaters Donate \$6.00 to defeat @SenWarren

The Tweet included a link to the donation website of a political action committee.

49. On or about December 12, 2017, a member of the Conspiracy used the Twitter account “@KaniJJackson” to post a Tweet about the 2017 special election in Alabama:

Dear Alabama, You have a choice today. Doug Jones put the KKK in prison for murdering 4 young black girls. Roy Moore wants to sleep with your teenage daughters. This isn't hard. #AlabamaSenate

50. On or about December 12, 2017, a member of the Conspiracy used the Twitter account “@JohnCopper16” to post a Tweet about the 2017 special election in Alabama:

People living in Alabama have different values than people living in NYC. They will vote for someone who represents them, for someone who they can trust. Not you. Dear Alabama, vote for Roy Moore.

51. On or about December 16, 2017, a member of the Conspiracy used the Twitter account “@KaniJJackson” to post a Tweet about the Special Counsel’s Office’s investigation:

If Trump fires Robert Mueller, we have to take to the streets in protest. Our democracy is at stake.

52. On or about December 17, 2017, a member of the Conspiracy used the Twitter account “@Amconvoice” to repost a Tweet about the Special Counsel’s Office’s investigation:

Liberals : If Trump fire/removes Mueller, we will take to the streets/protest. (DNC must have sent that talking point out today. Everyone using same line) Why would Trump need to remove/fire Mueller. Mueller is doing fine job destroying himself. Keep the implosion coming Mueller.

53. On or about January 19, 2018, a member of the Conspiracy used the Twitter account “@KaniJJackson” to post a Tweet about the government shutdown of 2018:

Who ended DACA? Who put off funding CHIP for 4 months? Who rejected a deal to restore DACA? It's not #SchumerShutdown. It's #GOPShutdown.

54. On or about January 20, 2018, a member of the Conspiracy used the Twitter account “@JohnCopper16” to repost a Tweet about the government shutdown of 2018:

Anyone who believes that President Trump is responsible for the #shutdown2018 is either an outright liar or horribly ignorant. #SchumerShutdown for illegals. #DemocratShutdown #DemocratLosers #DemocratsDefundMilitary #AlternativeFacts

55. On or about January 26, 2018, a member of the Conspiracy used the Twitter account “@JemiSHaaaZzz” to repost a Tweet about a Senate vote on reproductive health issues, referencing the telephone number of the U.S. Capitol switchboard:



Republicans have scheduled a vote Monday on legislation that would ban some women's health care choices 

We can't turn back the clock on women's reproductive health. Call your Senators now and tell them to vote NO: (202) 224-3121.

56. On or about February 8, 2018, a member of the Conspiracy used the Twitter account “@Amconvoice” to post a Tweet about the 2018 U.S. midterm election:

The only way the Democrats can win 101 GOP seats is to cheat like they always do with illegals & dead voters.

57. On or about February 15, 2018, a member of the Conspiracy used the Twitter account “@KaniJJackson” to post a Tweet about the Parkland, Florida, school shooting and the 2018 U.S. midterm election:

Reminder: the same GOP that is offering thoughts and prayers today are the same ones that voted to allow loosening gun laws for the mentally ill last February. If you're outraged today, VOTE THEM OUT IN 2018.
#guncontrol #Parkland

58. On or about February 16, 2018, a member of the Conspiracy used the Twitter account “@JemiSHaaaZzz” to repost a Tweet about the Special Counsel’s Office’s indictment of Russian companies and nationals who sought to interfere with U.S. elections and political processes:

Dear @realDonaldTrump: The DOJ indicted 13 Russian nationals at the Internet Research Agency for violating federal criminal law to help your campaign and hurt other campaigns. Still think this Russia thing is a hoax and a witch hunt? Because a lot of witches just got indicted.

59. On or about February 16, 2018, a member of the Conspiracy used the Twitter account “@JohnCopper16” to post two Tweets about the Special Counsel’s Office’s indictment:

Russians indicted today: 13 Illegal immigrants crossing Mexican border indicted today: 0 Anyway, I hope that all those Internet Research Agency f*ckers will be sent to gitmo.

We didn't vote for Trump because of a couple of hashtags shilled by the Russians. We voted for Trump because he convinced us to vote for Trump. And we are ready to vote for Trump again in 2020!

60. On or about February 19, 2018, a member of the Conspiracy used the Twitter account “@KaniJJackson” to post a Tweet about the 2018 midterm election:

Midterms are in 261 days, use this time to: - Promote your candidate on social media - Volunteer for a campaign - Donate to a campaign - Register to vote - Help others to register to vote - Spread the word We have only 261 days to guarantee survival of democracy. Get to work!

61. On or about February 27, 2018, a member of the Conspiracy used the Twitter account “@JohnCopper16” to post the following Tweet about the 2018 midterm election:

Dem 2018 platform: - We want women raped by the jihadists - We want children killed - We want higher gas prices - We want more illegal aliens - We want more Mexican drugs And they are wondering why @realDonaldTrump became the President...

62. On or about March 9, 2018, a member of the Conspiracy used the Twitter account “@JohnCopper16” to post the following two Tweets about the summit between President Trump and North Korean President Kim Jong Un:

WOW! Donald Trump is going to meet Kim Jong Un to discuss denuclearization of North Korea, If Trump gets North Korea to denuclearize its game over for the Democrats! That would be monumental!

RETWEET if you think that Donald Trump deserves a Nobel Peace Prize for resolving the North Korean crisis!

63. On or about March 9, 2018, a member of the Conspiracy used the Twitter account “@KaniJJackson” to post the following two Tweets about the summit between President Trump and North Korean President Kim Jong Un:

Trump says he will meet with Kim Jong Un in May. But he might not even be president by then. Mueller is coming!

The same people who criticized Barack Obama for signing the Iran Nuclear deal are already praising Trump for his promise to meet with Kim Jong Un and talk about denuclearization.

64. On or about March 14, 2018, a member of the Conspiracy used the Twitter account “@wokeluisa” to post several Tweets regarding the Pennsylvania special election on March 13, 2018, for a House of Representatives seat:

Enthusiastically watching #PA18 turn blue

Lamb up by only 703 votes... EVERY. VOTE. COUNTS. #PA18

We need to flip about 20 seats to regain control of the House! 19 after tonight! #PA18

Tonight's results are a message regardless of the outcome: D voters are motivated! Blue Wave coming! #PA18

65. On or about March 14, 2018, a member of the Conspiracy used the Twitter account "@TheTrainGuy13" to repost a Tweet about voter fraud:



66. On or about March 18, 2018, a member of the Conspiracy used the Twitter account “@wokeluisa” to post the following Tweet about election fraud:

Fun fact: the last time a new Republican president was elected without electoral fraud was in 1988

67. On or about March 18, 2018, a member of the Conspiracy used the Twitter account “@wokeluisa” to repost the following Tweet:

Just a reminder that: - Majority black Flint, Michigan still has drinking water that will give you brain damage if consumed. - Republicans are still trying to keep black people from voting. - A terrorist has been targeting black families for assassination in Austin, Texas.

68. On or about March 19, 2018, a member of the Conspiracy used the Twitter account “@wokeluisa” to post the following Tweets about an explosion in Austin, Texas:

Trump will tweet NOTHING about yet another explosion in Austin b/c all of the victims have been black and hispanic. Mark my words

Another explosion in southwest Austin, Texas! Why these bombings ain't a bigger story? Oh yes... all of the victims have been Black and Hispanic #AustinBombings

69. On or about March 19, 2018, a member of the Conspiracy used the Twitter account “@wokeluisa” to post the following Tweet about the 2018 midterm election:

Make sure to pre-register to vote if you are 16 y.o. or older. Don't just sit back, do something about everything that's going on because November 6, 2018 is the date that 33 senate seats, 435 seats in the House of Representatives and 36 governorships will be up for re-election.

70. On or about March 22, 2018, a member of the Conspiracy used the Twitter account “@johncopper16” to post the following Tweet about the 2018 midterm election:

Just a friendly reminder to get involved in the 2018 Midterms. They are motivated They hate you They hate your morals They hate your 1A and 2A rights They hate the Police They hate the Military They hate YOUR President

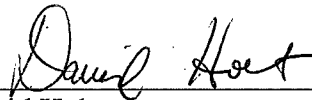
71. On or about May 17, 2018, a member of the Conspiracy used the Twitter account “@KaniJJackson” to repost two Tweets about a U.S. Senate vote on Net Neutrality:

Ted Cruz voted to repeal #NetNeutrality. Let’s save it and repeal him instead.

Here’s the list of GOP senators who broke party lines and voted to save #NetNeutrality: Susan Collins John N Kennedy Lisa Murkowski Thank you!

CONCLUSION

72. Based on the foregoing, and on my training, experience, and participation in this and other investigations, I submit there is probable cause to believe that, from at least 2014 to the present, ELENA ALEKSEEVNA KHUSYAYNOVA has violated Title 18, United States Code, Section 371.



David Holt
Special Agent
Federal Bureau of Investigation

Reviewed by:

Jay V. Prabhu
Chief, Cybercrime Unit
Assistant U.S. Attorney

Alex Ifimie
Special Assistant U.S. Attorney

Sworn to before me this 28 th day
of September, 2018



/s/
Ivan D. Davis
United States Magistrate Judge