

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America
v.
Mariia Butina
also known as Maria Butina
~~SECRET~~

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. _____

APPENDIX A TO CRIMINAL COMPLAINT

Conspiracy to Act as an Agent of a Foreign Government

1. From in or around 2015 and possibly earlier, up to and including the present, in the District of Columbia and elsewhere, MARIIA BUTINA, a/k/a "Maria Butina" ("BUTINA"), the defendant, and others known and unknown, including an official of the Russian Federation, knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, Title 18, United States Code, Section 951, in violation of Title 18, United States Code, Section 371.

Objects of the Conspiracy

2. The objects of the conspiracy were:

- a. To act in the United States as an agent of a foreign government, specifically the Russian Federation, without prior notification to the Attorney General;
- b. To act in the United States as an agent of a foreign government official, specifically an official of the Russian Federation, without prior notification to the Attorney General;
- c. To exploit personal connections with U.S. persons having influence in American politics in an effort to advance the interests of the Russian Federation without prior notification to the Attorney General; and

- d. To infiltrate organizations active in U.S. politics in an effort to advance the interests of the Russian Federation without prior notification to the Attorney General.

Manner and Means of the Conspiracy

3. BUTINA and her coconspirator(s) would and did use the following manner and means, among others, to accomplish the objects of the conspiracy:

- a. While serving as Special Assistant to an official of the Russian Federation, BUTINA would meet in person and communicate via electronic means with that official for the purpose of developing and executing a plan to identify and exploit personal connections with U.S. persons having influence in American politics who were in positions to advance the interests of the Russian Federation.
- b. BUTINA did establish contact with an American political operative in Moscow who thereafter would work with BUTINA in the United States to jointly arrange introductions to U.S. persons having influence in American politics for the purpose of advancing the agenda of the Russian Federation.
- c. While residing in the United States, BUTINA would work on behalf of the official of the Russian Federation by attempting to establish unofficial lines of communications with U.S. politicians and political organizations.
- d. BUTINA would communicate via email, Twitter direct message, and other means with the official of the Russian Federation, and others, to send reports, seek direction, and receive orders in furtherance of the conspiracy.

Overt Acts

4. In furtherance of this conspiracy and to effect the illegal objects thereof, one or more

conspirators committed the following overt acts, among others:

- a. On or about March 14, 2016, BUTINA emailed a U.S. person in an effort to develop, maintain, and exploit a relationship in furtherance of the conspiracy;
- b. In or around August 2016, BUTINA entered the United States on an F-1 Student Visa, for the purported purpose of attending university full time in the District of Columbia, when in truth and in fact, BUTINA continued to act as an agent on behalf of the Russian Federation and the official of the Russian Federation; and
- c. On or about September 26, 2016, BUTINA emailed a U.S. person to organize an event for the purpose of influencing the views of U.S. officials, as those views relate to the Russian Federation.