

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FILED

2022 JUL 26 17
CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. **8:22-cr-259-WFJ-AEP**
18 U.S.C. § 371

ALEKSANDR VIKTOROVICH IONOV
a/k/a "Alexander Ionov,"
a/k/a "Sasha"

~~SEALED~~

INDICTMENT

The Grand Jury charges:

COUNT ONE

A. Introduction

At times material to this Indictment:

1. ALEKSANDR VIKTOROVICH IONOV ("IONOV") was a citizen of the Russian Federation ("Russia") who resided in Moscow, Russia. IONOV was the founder and president of the Anti-Globalization Movement of Russia ("AGMR"), headquartered in Moscow, Russia. According to its website, AGMR advocated for "the full sovereignty of nation-states including the sovereignty of Russia as an independent player on the political, economic and cultural world stage." AGMR was funded by the Russian government through government grants.

2. FSB OFFICER 1 was a citizen of Russia who resided in Moscow, Russia. FSB OFFICER 1 was employed as an officer of the Federal Security Service of the Russian Federation (Federal'naya Sluzhba Bezopasnosti Rossiyskoy Federatsii, "FSB"). The FSB was Russia's internal security and counterintelligence

~~SEALED~~

service, headquartered on Lubyanka Square in Moscow, Russia. The FSB implemented Russia's national security policies, including in the areas of counterintelligence, counterterrorism, and internal security. FSB OFFICER 1 reported to a higher-level FSB officer, the RUSSIAN OFFICIAL, whose identity is known to the Grand Jury.

3. FSB OFFICER 2, whose identity is also known to the Grand Jury, was an FSB officer residing in Moscow, Russia. FSB OFFICER 2 worked with FSB OFFICER 1 and would coordinate with IONOV on behalf of the FSB when FSB OFFICER 1 was unavailable. FSB OFFICER 2 also reported to the RUSSIAN OFFICIAL.

4. From at least as early as October of 2013, IONOV worked with officers of the FSB, including FSB OFFICER 1, FSB OFFICER 2, and the RUSSIAN OFFICIAL to use members of U.S. political groups as foreign agents of Russia within the United States, without notification to the Attorney General. Working under FSB supervision and with FSB support, IONOV recruited members of various political groups within the United States and other countries, including Ukraine, Spain, the United Kingdom, and Ireland, to attend conferences in Russia. These conferences were sponsored by AGMR and funded by the Russian government. The purpose of the conferences was to encourage the participating groups to advocate for separating from their home countries. At these conferences, IONOV entered into partnership with some of the U.S. separatist groups, including groups from Florida and California. Thereafter, IONOV exercised direction or control over

these groups on behalf of the FSB. IONOV also monitored and regularly reported on their activities to the FSB.

5. Specifically, IONOV provided financial support to these groups on behalf of the FSB; directed these groups to publish pro-Russian propaganda, as well as other information designed to cause dissension in the United States and to promote secessionist ideologies; coordinated and funded direct action by these groups within the United States that was designed to further Russian interests; and coordinated coverage of these groups' activities in Russian media outlets. IONOV relayed detailed information about his activities and the activities of these separatist groups to FSB OFFICER 1, the RUSSIAN OFFICIAL, and FSB OFFICER 2.

6. U.S. Political Group 1 was a political group based in St. Petersburg, Florida. U.S. Political Group 1 promoted its views using multiple media outlets, including websites it operated, social media, and a radio station.

7. Unindicted Co-conspirator 1 ("UIC-1"), whose identity is known to the Grand Jury, was a United States citizen residing in St. Petersburg, Florida, and the founder and chairman of U.S. Political Group 1. In May of 2015, UIC-1 traveled to Russia and entered U.S. Political Group 1 into a partnership with IONOV and AGMR, knowing that IONOV and AGMR were agents of the Russian government.

8. Unindicted Co-conspirator 2 ("UIC-2"), whose identity is known to the Grand Jury, was a United States citizen residing in St. Petersburg, Florida, and St. Louis, Missouri, and a leader of a component of U.S. Political Group 1. UIC-2 facilitated communications between IONOV and UIC-1.

9. Unindicted Co-conspirator 3 (“UIC-3”), whose identity is known to the Grand Jury, was a United States citizen residing in St. Petersburg, Florida, and St. Louis, Missouri, and a member of U.S. Political Group 1. UIC-3 ran for local political office in St. Petersburg in 2017.

10. Unindicted Co-conspirator 4 (“UIC-4”), whose identity is known to the Grand Jury, was a United States citizen residing in St. Petersburg, Florida, and the Director of Agitation and Propaganda of U.S. Political Group 1. UIC-4 ran for local political office in St. Petersburg in 2017 and 2019.

11. Unindicted Co-conspirator 5 (“UIC-5”), whose identity is known to the Grand Jury, was a United States citizen residing in Atlanta, Georgia, and the Secretary General of U.S. Political Group 1 until approximately November of 2018. In or around November of 2018, UIC-5 left U.S. Political Group 1 and founded U.S. Political Group 2, which is based in Atlanta, Georgia. As recently as March of 2022, UIC-5 and U.S. Political Group 2—acting at the direction or control of, and with funding from, IONOV and AGMR—engaged in direct action within the United States to further the interests of Russia.

12. U.S. Political Group 3 was a political group based in California. U.S. Political Group 3’s primary goal was the promotion of California’s secession from the United States.

13. Unindicted Co-conspirator 6 (“UIC-6”), whose identity is known to the Grand Jury, was a United States citizen who resided in Russia and California. UIC-6 was the founder and president of U.S. Political Group 3. UIC-6 received funding

from IONOV to support protests and political activities within the United States, and UIC-6 traveled to the United States to engage in these activities. IONOV funded these activities on behalf of the FSB, with the stated goal of causing turmoil within the United States.

14. At no time were IONOV, FSB OFFICER 1, or any of their co-conspirators duly accredited diplomatic or consular officers; officially and publicly acknowledged and sponsored officials or representatives of the Russian Federation; or officially and publicly acknowledged and sponsored staff members or employees thereof.

15. At no time did IONOV, FSB OFFICER 1, or any of their co-conspirators notify the Attorney General that they would and did act in the United States as an agent of a foreign government and official.

B. Background on Russian Foreign Influence Operations

16. Among the foreign policy objectives of Russian government leadership is to expand Russia's sphere of influence. Russia targets the United States and its allies, as well as other countries, to further that goal. Through these influence operations, Russia attempts to shape foreign perceptions and to influence populations by, among other things, seeking to create wedges that reduce trust and confidence in democratic processes, degrading democratization efforts, weakening U.S. partnerships with European allies, undermining Western sanctions, encouraging anti-U.S. and anti-Western political views, and countering efforts to

bring Ukraine and other former Soviet states into European and international institutions.

17. Russian influence operations often use social media targeted at U.S. and global audiences to sow discord and mistrust in the U.S. and other countries' political systems; disseminate disinformation to confuse and mislead citizens in the United States, Europe, and Russia itself; and to recruit U.S. persons to advance Russia's operational goals.

18. As part of these efforts, Russia has recruited and forged ties with persons and groups around the world who are positioned to amplify and reinforce Russia's messaging campaigns in furtherance of its goals of destabilizing Western societies. These efforts have included the use of nonprofit organizations as fronts to promote connections between Russia and its compatriots living abroad, to propagate disinformation, and to surreptitiously seek access to foreign officials, businesspersons, and other figures, in the United States and elsewhere, to advance and promote Russian interests.

C. The Conspiracy

19. Beginning on an unknown date, but at least as early as in or around December of 2014, and continuing until the date of this Indictment, in the Middle District of Florida, Russia, and elsewhere, the defendant,

ALEKSANDR VIKTOROVICH IONOV
a/k/a "Alexander Ionov,"
a/k/a "Sasha"

did knowingly and willfully combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to act as an agent of a foreign government and foreign officials, to wit, the Russian Federation and officials of that government, without prior notification to the Attorney General, as required by law, in violation of 18 U.S.C. § 951(a).

D. Manner and Means

20. The manner and means by which the co-conspirators sought to accomplish the objects of the conspiracy included, among others:

a. It was part of the conspiracy that, for the purpose of establishing relationships that could further the interests of the Russian Federation, IONOV would and did recruit and sponsor representatives of separatist groups within the United States and elsewhere, including UIC-1, UIC-6, and others, to travel to pro-separatist conferences in Moscow, Russia, that were sponsored by AGMR and the Russian Federation;

b. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV would and did communicate through encrypted electronic messaging applications and in-person meetings with FSB OFFICER 1, FSB OFFICER 2, the RUSSIAN OFFICIAL, and others for the purpose of developing and executing a plan to identify and exploit connections with United States political groups, including U.S. Political Group 1, U.S. Political Group 2, and U.S. Political Group 3;

c. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV and others acting at his direction would and did engage in “agitprop,” or “agitation and propaganda,” by writing articles that contained Russian propaganda and disinformation, and sending these articles by email or encrypted electronic messages to UIC-1, UIC-2, UIC-3, and others working on behalf of U.S. Political Group 1, with instructions to publish them in U.S. Political Group 1’s media outlets;

d. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, U.S. Political Group 1 would and did publish articles authored by IONOV, permit IONOV to speak on behalf of the Russian Federation during online multimedia presentations, and make public statements in support of the Russian Federation and its interests when directed to by IONOV;

e. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV and AGMR would and did exercise direction or control over – and provide financial support, consulting, instruction, and promotion in Russian media outlets to – U.S. Political Group 1, U.S. Political Group 2, and U.S. Political Group 3 in support of protests, political campaigns, and other actions within the United States;

f. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV would and did utilize his connections within Russian state-supported media to promote international

awareness of the activities that he had directed U.S. Political Group 1, U.S. Political Group 2, and U.S. Political Group 3 to undertake;

g. It was further part of the conspiracy that, in order to further the objects of the conspiracy, IONOV directed UIC-1, UIC-2, UIC-3, UIC-5, UIC-6, and others to provide detailed information regarding the activities of U.S. Political Group 1, U.S. Political Group 2, U.S. Political Group 3, and other groups in the United States, which IONOV compiled into reports for FSB OFFICER 1, FSB OFFICER 2, the RUSSIAN OFFICIAL, and other FSB officials;

h. It was further part of the conspiracy that, in order to further the objects of the conspiracy, the co-conspirators, including IONOV, UIC-1, UIC-2, UIC-3, UIC-4, UIC-5, UIC-6, and others would and did communicate over email, encrypted electronic messaging applications, and voice and video calls about funding, joint actions, and other matters related to the conspiracy;

i. It was further part of the conspiracy that, in order to further the objects of the conspiracy, IONOV would and did utilize his assistants to facilitate English-language communications with UIC-1, UIC-2, UIC-3, and others over email, encrypted electronic messaging applications, or voice and video call;

j. It was further part of the conspiracy that IONOV and FSB OFFICER 1 would and did meet in person for the purpose of exchanging reports, information, and money relating to the activities of U.S. Political Group 1 and U.S. Political Group 3;

k. It was further part of the conspiracy that co-conspirators would and did employ various techniques to protect their anonymity and to thwart detection of their activities by government and law-enforcement agencies; and

l. It was further part of the conspiracy that co-conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

E. Overt Acts

21. In furtherance of the conspiracy, and to effect the objects thereof, at least one of the co-conspirators committed or caused to be committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

May 2015: Meeting in Moscow

a. On or about May 13, 2015, defendant IONOV sent an email inviting UIC-1 to Moscow, Russia, for an “[a]ll expenses paid (travel + accommodations)” visit.

b. On or about May 20, 2015, defendant IONOV caused an electronic message to be sent to UIC-2 stating that the purpose of UIC-1’s trip to Russia would be to “communicate on future cooperation.”

c. On or about May 26, 2015, UIC-1 traveled from Tampa, Florida, to Moscow, Russia, on behalf of U.S. Political Group 1 for the purpose of meeting with defendant IONOV.

2015 United Nations Petition

d. On or about August 13, 2015, defendant IONOV caused electronic messages to be sent to UIC-2 directing UIC-2 to write a petition to the United Nations "ASAP" alleging that the United States had committed genocide against African people in the United States and also directing UIC-2 to send the petition to the "UN office in New York and to the websites of the White House and change.org."

e. On or about August 20, 2015, defendant IONOV caused electronic messages to be sent to UIC-2 directing UIC-2 to post the genocide petition that day on change.org and "the site of the White House" because defendant IONOV and AGMR wanted to spread the petition over their "influential information resources" and raise awareness around the world.

f. On or about August 23, 2015, defendant IONOV sent an electronic message to UIC-2, stating that he had donated \$500.00 to U.S. Political Group 1.

g. On or about August 26, 2015, UIC-2 caused U.S. Political Group 1 to post a "Petition on Crime of Genocide against African People in the United States" on the website Change.org and to promote the petition on its own news website.

h. On or about August 28, 2015, defendant IONOV caused an electronic message to be sent to UIC-2 stating that the petition had been translated into Russian and would spread over Russian media outlets.

i. On or about September 5, 2015, UIC-2 sent an electronic message to defendant IONOV's assistant, stating that she had caused the petition to be electronically transmitted to the United Nations Secretary General and to the United Nations General Assembly.

September 2015 Dialogue of Nations Conference

j. On or about August 25, 2015, defendant IONOV caused an electronic message to be sent inviting UIC-1 to a "Dialogue of Nations" Conference hosted by IONOV and AGMR in Moscow, Russia, that would be attended by representatives of separatist movements from different parts of the world, including those from the Russian-backed breakaway state in the Donbas region of Ukraine, the "Donetsk People's Republic."

k. On or about September 16, 2015, UIC-1 traveled from Tampa, Florida, to the "Dialogue of Nations" separatist conference in Moscow, Russia, that was hosted by defendant IONOV and AGMR and funded by the Russian government.

l. On or about September 23, 2015, UIC-3 sent an email to UIC-1, UIC-2, and other members of U.S. Political Group 1 that contained UIC-1's summary of his trip to the "Dialogue of Nations" separatist conference in Moscow, Russia, which stated, in part, that the AGMR is "a solid institution of Russian politic" and that it was "clear" that AGMR was an "instrument of [the] Russian government," which, UIC-1 wrote, did not "disturb us."

m. On or about September 30, 2015, one or more of the co-conspirators caused an email to be sent to several members of U.S. Political Group 1, including UIC-1, UIC-2, UIC-3, and UIC-5, which stated, in part, that U.S. Political Group 1 recognized that the Russian Government was “more than likely” using AGMR “to utilize forces inside of the U.S. to sew [sic] division inside the U.S.”

2016 Reparations Tour

n. On or about January 21, 2016, defendant IONOV caused an electronic message to be sent to UIC-2 that contained a “Guarantee letter” that defendant IONOV had signed, which stated that IONOV promised to pay U.S. Political Group 1 \$12,000 to organize a “four-city tour from 22 to 29 January, 2016” related to the genocide petition.

o. On or about January 25, 2016, defendant IONOV caused an electronic message to be sent to UIC-2 asking U.S. Political Group 1 to involve as many people as possible in the four-city tour to show that people are opposing the “US colonial government.”

p. On or about February 1, 2016, defendant IONOV caused an electronic message to be sent to UIC-2, directing U.S. Political Group 1 to draft a detailed report describing the four-city tour that AGMR had funded to raise awareness for the genocide petition.

q. On or about February 4, 2016, defendant IONOV caused a wire transfer in the amount of approximately \$3,476.20 to be sent to U.S. Political Group 1.

r. On or about February 5, 2016, UIC-2 sent an electronic message to defendant IONOV's assistant containing a report from U.S. Political Group 1 summarizing U.S. Political Group 1's four-city tour.

s. On or about February 16, 2016, defendant IONOV caused a wire transfer in the amount of approximately \$3,476.20 to be sent to U.S. Political Group 1.

Article Concerning Russian Olympic Team

t. On or about July 29, 2016, defendant IONOV caused an electronic message to be sent to UIC-2 requesting that UIC-1 or U.S. Political Group 1 make a statement in support of the Russian Olympic team, which faced criticism ahead of the 2016 Summer Olympics after it was disclosed that Russian athletes had previously taken part in a state-run doping program.

u. On or about July 29, 2016, UIC-2 sent an email to UIC-1 concerning a draft statement from U.S. Political Group 1 in support of the Russian Olympic team.

v. On or about August 1, 2016, UIC-2 caused U.S. Political Group 1 to publish an anonymous article on its news website titled "Imperialists Ban Russia from 2016 Olympic Games: [U.S. Political Group 1] says 'let Russia play.'"

2017 St. Petersburg, Florida Elections

w. On or about July 20, 2017, defendant IONOV caused an electronic message to be sent to UIC-3, requesting an interview with UIC-3 to talk

about “reparations” and UIC-3’s plans to seek local office, and offering AGMR’s assistance to UIC-3, including “campaign finance.”

2018 Demonstration in California

x. On or about January 25, 2018, defendant IONOV sent an electronic message to UIC-6 in Russian regarding a demonstration that UIC-6 was planning at the California Capitol building in Sacramento, California, and mentioning the possibility of providing funding for the event.

y. On or about January 27, 2018, defendant IONOV sent an electronic message to UIC-6 in Russian regarding the demonstration that UIC-6 was planning and urging UIC-6 to physically enter the governor’s office.

z. On or about February 5, 2018, UIC-6 sent electronic messages to defendant IONOV that contained proposed designs for posters for an upcoming demonstration in support of California’s secession from the United States.

aa. On or about February 7, 2018, defendant IONOV sent an electronic message to UIC-6 in Russian stating that he had transferred \$500.00 to UIC-6.

bb. On or about February 8, 2018, defendant IONOV sent electronic messages to FSB OFFICER 1, containing photographs that UIC-6 had sent to defendant IONOV and advising FSB OFFICER 1 in Russian that the “posters” had been paid for.

cc. On or about February 14, 2018, UIC-6 led a demonstration on behalf of U.S. Political Group 3 in support of California's secession from the United States at the California Capitol building in Sacramento, California.

dd. On or about February 15, 2018, FSB OFFICER 1 sent defendant IONOV electronic messages in Russian asking defendant IONOV to send materials relating to U.S. Political Group 3's demonstration in Sacramento, California, and complaining that UIC-6's rally had not amounted to a "historic' rally IN THE PARLIAMENT BUILDING."

ee. On or about February 15, 2018, defendant IONOV sent electronic messages to UIC-6 asking for additional information about and pictures of the demonstration "within two hours."

ff. On or about February 16, 2018, defendant IONOV sent FSB OFFICER 1 several photographs of the February 14, 2018, demonstration that UIC-6 had led in Sacramento, California.

gg. On or about March 12, 2018, defendant IONOV sent electronic messages to FSB OFFICER 1 containing news articles about UIC-6 and the California secession movement and noting, in Russian, that FSB OFFICER 1 had asked for "turmoil" and "there you go."

International Committee for the Protection of Human Rights

hh. On or about November 14, 2018, defendant IONOV caused an electronic message to be sent to UIC-2, which stated:

Dear comrade,

On behalf of the Antiglobalization Movement of Russia we express our deepest respect to you! We have recently begun the project on the base of International Committee for the Protection of Human Rights which is the partner of the UN. Alexander Ionov is a current counselor and plenipotentiary representative of the Committee. The project refers to the protection of legal interests and human rights of Russian nationalities who were arrested by the US on the territory of the third countries. Russian Federation regards these facts as kidnapping and blatant violation of their rights that require strict investigation by Russian investigation agencies and diplomats.

International Committee for the Protection of Human Rights is welcoming you to be come our expert on protection of human rights in the USA to assess the actions of the US government towards Russian nationalities. We are hoping for your assistance and protection of the interests of Russian people who were illegally brought to US and put to torture.

Best regards,
Alexander Ionov

ii. On or about March 20, 2019, FSB OFFICER 1 sent an electronic message to defendant IONOV that contained a public media report linking IONOV to fundraising for the defense of Russian foreign agent Mariia Butina, and FSB OFFICER 1 commented that the article had called IONOV the “patron of Butina, who admitted to interfering in the 2016 elections,” and warned IONOV that sanctions would be imposed against him.

2019 St. Petersburg, Florida Elections

jj. On or about June 28, 2019, defendant IONOV sent electronic messages in Russian to the RUSSIAN OFFICIAL about UIC-4's campaign for local office in St. Petersburg, Florida, adding that the elections would take place on August 26 and that defendant IONOV had been "consulting every week."

kk. On or about June 28, 2019, FSB OFFICER 2 sent an electronic message to defendant IONOV in Russian asking how much money had been raised for UIC-4's campaign for local office in St. Petersburg, Florida.

ll. On or about June 28, 2019, defendant IONOV sent a voice message in Russian to FSB OFFICER 2, stating that defendant IONOV had "alone sent 450" for UIC-4's campaign and that other events he had participated in each raised "at least 1,500."

mm. On or about August 23, 2019, defendant IONOV sent an electronic message to FSB OFFICER 1 containing a video of UIC-4 delivering a campaign speech.

nn. On or about August 30, 2019, defendant IONOV made a public social media post congratulating UIC-4 for making it past the primary election for local office.

oo. On or about September 6, 2019, FSB OFFICER 1 sent defendant IONOV an electronic message in Russian asking defendant IONOV to send statistics and information about UIC-4's campaign, remarking that "Our election campaign is kind of unique. Are we the first in history?"

pp. On or about September 12, 2019, defendant IONOV sent an electronic message to FSB OFFICER 1 in Russian addressing the percentage of votes that UIC-4 had won in the primary, referring to UIC-4 as the candidate “whom we supervise.”

2020 Dialogue of Nations Conference

qq. On or about February 20, 2020, defendant IONOV sent an electronic message to UIC-2, inviting UIC-1 to another “Dialogue of Nations” separatist conference in Donetsk, Ukraine.

rr. On or about April 30, 2020, defendant IONOV wrote a Russian language report for FSB OFFICER 1, describing an April 20, 2020 “Dialogue of Nations” conference that IONOV and AGMR had hosted, which IONOV wrote had been coordinated with individuals in the Russian-backed “Donetsk People’s Republic” and also noting that UIC-1 had spoken at the conference.

ss. On or about May 6, 2020, defendant IONOV caused a request to be sent to UIC-1 from “Russia, the Donetsk People’s Republic,” in which defendant IONOV wrote that the “6th anniversary of the Donetsk People’s Republic” was approaching and asking “friends of the Donetsk People’s Republic” to send video congratulations to its residents because the pandemic was preventing mass gatherings.

tt. On or about May 15, 2020, defendant IONOV sent an electronic message to FSB OFFICER 1, which contained a message from UIC-1’s assistant and

a link to a video that UIC-1 had made to congratulate the residents of the Russian-backed “Donetsk People’s Republic.”

uu. On or about May 15, 2020, defendant IONOV wrote a Russian language report for FSB OFFICER 1 advising FSB OFFICER 1 that the “leader of the Donetsk People’s Republic” had asked IONOV to direct U.S. organizations to record “congratulatory messages on the occasion of Republic Day,” and noting that U.S. Political Group 1 and U.S. Political Group 3 had “recorded their speeches,” which “were broadcast on outdoor screens in the center of Donetsk,” and further stating that, “[f]or the first time since the Donetsk People’s Republic came into existence, leaders of American nonprofit organizations congratulated citizens.”

Reports on U.S. Groups

vv. On or about June 12, 2020, defendant IONOV wrote a Russian language report for FSB OFFICER 1 reporting on protests in the United States, listing some of the joint programs between AGMR and U.S. Political Group 1, to include conferences that were “consistently sponsored” by AGMR and provided with “information support,” as well as activities “in over 40 cities,” and noting that UIC-2 had told defendant IONOV that activists prepared through “collaboration between AGMR and [U.S. Political Group 1]” are taking to the streets and leading the way for “hundreds of people.”

ww. On or about January 16, 2021, defendant IONOV wrote a Russian language report for the FSB concerning the history of his relationship with U.S. Political Group 1, explaining that, after UIC-1 visited Moscow in 2015, AGMR

and U.S. Political Group 1 had developed a "bilateral cooperation program," and that, based on defendant IONOV's and UIC-1's agreement, U.S. Political Group 1 had conducted a reparations tour in the United States that defendant IONOV had fully financed.

xx. On or about July 16, 2021, defendant IONOV wrote a Russian language report for the FSB concerning U.S. Political Group 1, noting that he had held a video conference call with UIC-2, who had "expressed hope" that a delegation from U.S. Political Group 1 could fly to Moscow to promote their "international standing," and that activists from U.S. Political Group 1 had stated that, without AGMR support, they had difficulty getting coverage from the international press.

2022: Russian Invasion of Ukraine

yy. On or about February 24, 2022, UIC-3 sent an email to UIC-1 and UIC-2 that included a message from defendant IONOV entitled "URGENT MESSAGE FROM THE ANTIGLOBALIST MOVEMENT OF RUSSIA." In the message, IONOV wrote that: "the war with Ukraine has began"; "Russia has exhausted all possible tools to prevent conflict" in Ukraine; "we must remember that the war began 8 years ago, when the US and the EU brought new leadership to power in Kiev"; and "[i]t was the pro-Western neo-fascists who burned people in Odessa and shot thousands of civilians in the Donbas."

zz. On or about March 13, 2022, UIC-4 gave a video presentation on behalf of U.S. Political Group 1, in which she stated that U.S. Political Group 1 and UIC-1, along with the "leaders of Venezuela, China, Iran, Cuba, and Nicaragua"

had spoken out in opposition to the “U.S. imperialist-created” crisis in Ukraine and in solidarity with the people of Russia and their elected government and leadership.

aaa. On or about March 13, 2022, defendant IONOV spoke by video, with the assistance of a translator, at a video conference hosted by U.S. Political Group 1 concerning the Russian invasion of Ukraine, falsely stating that Nazis were in power in Ukraine and were killing innocent people, and that Russia had invaded Ukraine only to stop the killing of Russians by the Ukrainian army.

bbb. On or about March 18, 2022, defendant IONOV wrote a Russian language report for the FSB, noting that, during a phone conversation, he had appealed to the leadership of U.S. Political Group 1 to support Russia in the “information war unleashed” by the West, and that, on March 13, 2022, U.S. Political Group 1 had hosted a video conference watched by thousands of people during which participants expressed support for the Russian invasion of Ukraine.

ccc. On or about March 19, 2022, UIC-4 sent an email to another individual that contained an advertisement for a March 20, 2022 video presentation by defendant IONOV and UIC-1; after noting that the presentation would discuss “NATO” and “Nazis in Ukraine,” UIC-4 signed off the email by writing “[U.S. Political Group 1] Stands with Russia! [U.S. Political Group 1] Stands with Putin!”

ddd. On or about March 19, 2022, UIC-4 sent an email to defendant IONOV, with a link to a shared document, and stated “Here is a link to the script that we will be using. There are a few questions asked specifically of you, but you are able to contribute to any aspect of the discussion that you feel most comfortable.”

eee. On or about March 20, 2022, defendant IONOV spoke, with the assistance of a translator, at a video conference hosted by U.S. Political Group 1 concerning the Russian invasion of Ukraine; IONOV falsely stated that anybody who supported Ukraine was also supporting Naziism and white supremacy.

Social Media Company Protest

fff. On or about March 18, 2022, defendant IONOV sent an electronic message to UIC-5 with a picture of a design for a poster protesting a United States social media company's decision to place content restrictions on posts that supported Russia's invasion of Ukraine and asking if UIC-5 could print the posters.

ggg. On or about March 19, 2022, defendant IONOV paid approximately \$2,883.44 to purchase airline tickets for UIC-5 and three other members of U.S. Political Group 2 to fly from Atlanta, Georgia, to San Francisco, California, on March 22, 2022, and to return from San Francisco to Atlanta on March 24, 2022.

hhh. On or about March 23, 2022, UIC-5 sent defendant IONOV an electronic message with a video depicting UIC-5 and other members of U.S. Political Group 2 at the headquarters of a social media company in California, holding a Russian flag and posters that defendant IONOV had designed.

iii. On or about March 23, 2022, defendant IONOV sent UIC-5 an electronic message with a picture of a Russian news website’s social media page displaying a Russian-language news story about a protest by UIC-5 and U.S. Political Group 2 at a social media company’s headquarters in California, and defendant IONOV commented: “900,000 followers” and “1500 likes.”

All in violation of 18 U.S.C. § 371.

A TRUE BILL,



Foreperson

ROGER B. HANDBERG
United States Attorney

By: Cherie L. Krigsman
Cherie L. Krigsman
Assistant United States Attorney
Chief, National Security Section

By: Daniel J. Marcet
Daniel J. Marcet
Assistant United States Attorney

By: Jay Bratt
Jay Bratt, Chief
Counterintelligence and Export
Control Section

By: Cherie L. Krigsman
for Risha Asokan
Assistant United States Attorney

By: Corey P. Amundson
Corey Amundson, Chief
Public Integrity Section

By: Menno Goedman
Menno Goedman, Trial Attorney
Counterintelligence and Export
Control Section

By: Demetrius Sumner
Demetrius Sumner, Trial Attorney
Public Integrity Section

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

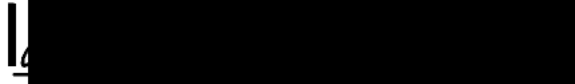
vs.

ALEKSANDR VIKTOROVICH IONOV
a/k/a "Alexander Ionov,"
a/k/a "Sasha"

INDICTMENT

Violations: 18 U.S.C. § 371

A true bill,



Foreperson

Filed in open court this 26th day
Of July 2022.

Clerk

Bail \$ _____
