

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

GEORGE PAPADOPOULOS

Defendant.

: Criminal No. 17-182(RDM)
:
: Magistrate NO. 17-MJ-539
:
: Violation:
: 18 U.S.C. § 1001 (False Statements)
:
:

INFORMATION

The Special Counsel informs the Court:

COUNT ONE

(False Statements)

FILED

OCT 03 2017


Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

On or about the 27th day of January, 2017, defendant GEORGE PAPADOPOULOS did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, defendant PAPADOPOULOS lied to special agents of the Federal Bureau of Investigation, concerning a federal investigation based out of the District of Columbia, about the timing, extent, and nature of his relationships and interactions with certain foreign nationals whom he understood to have close connections with senior Russian government officials.

(Title 18, United States Code, Section 1001(a)(2).)

ROBERT S. MUELLER, III
Special Counsel

By:


Jeannie S. Rhee
Andrew D. Goldstein
Aaron S.J. Zelinsky
The Special Counsel's Office



U.S. Department of Justice

The Special Counsel's Office

Washington, D.C. 20530

October 5, 2017

FILED

OCT - 5 2017

Clerk, U.S. District and
Bankruptcy Courts

Thomas M. Breen, Esq.
Robert W. Stanley, Esq.
Breen & Pugh
Monadnock Building
53 West Jackson Boulevard Suite 1215
Chicago, Illinois 60604

Re: United States v. George Papadopoulos
Criminal Case No. ~~17-17-MJ-539~~

17 Cr. 182 (RDM) SEALED

Dear Mr. Breen:

This letter sets forth the full and complete plea offer to your client, George Papadopoulos (hereinafter referred to as "your client" or "defendant"), from the Special Counsel's Office (hereinafter also referred to as "the Government" or "this Office"). This plea offer expires on October 5, 2017 at 2:00 p.m. If your client accepts the terms and conditions of this offer, please have your client execute this document in the space provided below. Upon receipt of the executed document, this letter will become the Plea Agreement (hereinafter referred to as "this Agreement"). The terms of the offer are as follows:

1. Charges and Statutory Penalties

Your client agrees to plead guilty to the Criminal Information, a copy of which is attached, charging your client with making false statements to the Federal Bureau of Investigation in violation of 18 U.S.C. § 1001.

Your client understands that a violation of 18 U.S.C. § 1001 carries a maximum sentence of 5 years' imprisonment; a fine of \$250,000, pursuant to 18 U.S.C. § 3571(b)(3); a term of supervised release of not more than 3 years, pursuant to 18 U.S.C. § 3583(b)(2); and an obligation to pay any applicable interest or penalties on fines and restitution not timely made.

In addition, your client agrees to pay a special assessment of \$100 per felony conviction to the Clerk of the United States District Court for the District of Columbia. Your client also understands that, pursuant to 18 U.S.C. § 3572 and § 5E1.2 of the United States Sentencing Commission, *Guidelines Manual* (2016) (hereinafter "Sentencing Guidelines," "Guidelines," or "U.S.S.G."), the Court may also impose a fine that is sufficient to pay the federal government the costs of any imprisonment, term of supervised release, and period of probation.

2. Factual Stipulations

Your client agrees that the attached "Statement of the Offense" fairly and accurately describes your client's actions and involvement in the offense to which your client is pleading guilty. Please have your client sign and return the Statement of the Offense as a written proffer of evidence, along with this Agreement.

3. Additional Charges

In consideration of your client's guilty plea to the above offense, your client will not be further prosecuted criminally by this Office for the conduct set forth in the attached Statement of the Offense.

4. Sentencing Guidelines Analysis

Your client understands that the sentence in this case will be determined by the Court, pursuant to the factors set forth in 18 U.S.C. § 3553(a), including a consideration of the applicable guidelines and policies set forth in the Sentencing Guidelines. Pursuant to Federal Rule of Criminal Procedure 11(c)(1)(B), and to assist the Court in determining the appropriate sentence, the parties agree to the following:

A. Estimated Offense Level Under the Guidelines

The parties agree that the following Sentencing Guidelines sections apply:

U.S.S.G. §2B1.1(a)(2)	Base Offense Level:	6
	Total:	6

B. Acceptance of Responsibility

The Government agrees that a 2-level reduction will be appropriate, pursuant to U.S.S.G. § 3E1.1, provided that your client clearly demonstrates acceptance of responsibility, to the satisfaction of the Government, through your client's allocution, adherence to every provision of this Agreement, and conduct between entry of the plea and imposition of sentence.

Nothing in this Agreement limits the right of the Government to seek denial of the adjustment for acceptance of responsibility, pursuant to U.S.S.G. § 3E1.1, and/or imposition of an adjustment for obstruction of justice, pursuant to U.S.S.G. § 3C1.1, regardless of any agreement set forth above, should your client move to withdraw your client's guilty plea after it is entered, or should it be determined by the Government that your client has either (a) engaged in conduct, unknown to the Government at the time of the signing of this Agreement, that constitutes obstruction of justice, or (b) engaged in additional criminal conduct after signing this Agreement.

In accordance with the above, the applicable Guidelines Offense Level will be at least **4**.

C. Estimated Criminal History Category

Based upon the information now available to this Office, your client has no criminal convictions.

Accordingly, your client is estimated to have zero criminal history points and your client's Criminal History Category is estimated to be I. Your client acknowledges that if additional convictions are discovered during the pre-sentence investigation by the United States Probation Office, your client's criminal history points may increase.

D. Estimated Applicable Guidelines Range

Based upon the agreed total offense level and the estimated criminal history category set forth above, your client's estimated Sentencing Guidelines range is zero months to six months' imprisonment (the "Estimated Guidelines Range"). In addition, the parties agree that, pursuant to U.S.S.G. § 5E1.2, should the Court impose a fine, at Guidelines level 4, the estimated applicable fine range is \$500 to \$9,500. Your client reserves the right to ask the Court not to impose any applicable fine.

The parties agree that, solely for the purposes of calculating the applicable range under the Sentencing Guidelines, neither a downward nor upward departure from the Estimated Guidelines Range set forth above is warranted. Accordingly, neither party will seek any departure or adjustment to the Estimated Guidelines Range, nor will either party suggest that the Court consider such a departure or adjustment, except as provided above. Moreover, your client understands and acknowledges that the Estimated Guidelines Range agreed to by the parties is not binding on the Probation Office or the Court. Should the Court determine that a different guidelines range is applicable, your client will not be permitted to withdraw your client's guilty plea on that basis, and the Government and your client will still be bound by this Agreement.

Your client understands and acknowledges that the terms of this section apply only to conduct that occurred before the execution of this Agreement. Should your client commit any conduct after the execution of this Agreement that would form the basis for an increase in your client's base offense level or justify an upward departure (examples of which include, but are not limited to, obstruction of justice, failure to appear for a court proceeding, criminal conduct while pending sentencing, and false statements to law enforcement agents, the probation officer, or the Court), the Government is free under this Agreement to seek an increase in the base offense level based on that post-agreement conduct.

5. Agreement as to Sentencing Allocation

The parties further agree that a sentence within the Estimated Guidelines Range would constitute a reasonable sentence in light of all of the factors set forth in 18 U.S.C. § 3553(a), should such a sentence be subject to appellate review notwithstanding the appeal waiver provided below. Nevertheless, your client reserves the right to seek a sentence below the Estimated Guidelines Range based upon factors to be considered in imposing a sentence

pursuant to 18 U.S.C. § 3553(a), and the Government reserves the right to seek a sentence above the Estimated Guidelines Range based on § 3553(a) factors.

6. Reservation of Allocution

The Government and your client reserve the right to describe fully, both orally and in writing, to the sentencing judge, the nature and seriousness of your client's misconduct, including any misconduct not described in the charges to which your client is pleading guilty.

The Government agrees to bring to the Court's attention at sentencing the defendant's efforts to cooperate with the Government, on the condition that your client continues to respond and provide information regarding any and all matters as to which the Government deems relevant. Your client also agrees that the sentencing in this case may be delayed until your client's efforts to cooperate have been completed, as determined by the Government, so that the Court will have the benefit of all relevant information before a sentence is imposed.

The parties also reserve the right to inform the presentence report writer and the Court of any relevant facts, to dispute any factual inaccuracies in the presentence report, and to contest any matters not provided for in this Agreement. In the event that the Court considers any Sentencing Guidelines adjustments, departures, or calculations different from any agreements contained in this Agreement, or contemplates a sentence outside the Guidelines range based upon the general sentencing factors listed in 18 U.S.C. § 3553(a), the parties reserve the right to answer any related inquiries from the Court. In addition, if in this Agreement the parties have agreed to recommend or refrain from recommending to the Court a particular resolution of any sentencing issue, the parties reserve the right to full allocution in any post-sentence litigation. The parties retain the full right of allocution in connection with any post-sentence motion which may be filed in this matter and/or any proceeding(s) before the Bureau of Prisons. In addition, your client acknowledges that the Government is not obligated and does not intend to file any post-sentence downward departure motion in this case pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure.

7. Court Not Bound by this Agreement or the Sentencing Guidelines

Your client understands that the sentence in this case will be imposed in accordance with 18 U.S.C. § 3553(a), upon consideration of the Sentencing Guidelines. Your client further understands that the sentence to be imposed is a matter solely within the discretion of the Court. Your client acknowledges that the Court is not obligated to follow any recommendation of the Government at the time of sentencing. Your client understands that neither the Government's recommendation nor the Sentencing Guidelines are binding on the Court.

Your client acknowledges that your client's entry of a guilty plea to the charged offense authorizes the Court to impose any sentence, up to and including the statutory maximum sentence, which may be greater than the applicable Guidelines range. The Government cannot, and does not, make any promise or representation as to what sentence your client will receive. Moreover, it is understood that your client will have no right to withdraw your client's plea of guilty should the Court impose a sentence that is outside the Guidelines range or if the Court

does not follow the Government's sentencing recommendation. The Government and your client will be bound by this Agreement, regardless of the sentence imposed by the Court. Any effort by your client to withdraw the guilty plea because of the length of the sentence shall constitute a breach of this Agreement.

8. Conditions of Release

Your client acknowledges that, although the Government will not seek a change in your client's release conditions pending sentencing, the final decision regarding your client's bond status or detention will be made by the Court at the time of your client's plea of guilty. The Government may move to change your client's conditions of release, including requesting that your client be detained pending sentencing, if your client engages in further criminal conduct prior to sentencing or if the Government obtains information that it did not possess at the time of your client's plea of guilty and that is relevant to whether your client is likely to flee or pose a danger to any person or the community. Your client also agrees that any violation of your client's release conditions or any misconduct by your client may result in the Government filing an ex parte motion with the Court requesting that a bench warrant be issued for your client's arrest and that your client be detained without bond while pending sentencing in your client's case.

9. Waivers

A. Venue

Your client waives any challenge to venue in the District of Columbia.

B. Statute of Limitations

Your client agrees that, should the conviction following your client's plea of guilty pursuant to this Agreement be vacated for any reason, any prosecution, based on the conduct set forth in the attached Statement of the Offense, that is not time-barred by the applicable statute of limitations on the date of the signing of this Agreement (including any counts that the Government has agreed not to prosecute or to dismiss at sentencing pursuant to this Agreement) may be commenced or reinstated against your client, notwithstanding the expiration of the statute of limitations between the signing of this Agreement and the commencement or reinstatement of such prosecution. It is the intent of this Agreement to waive all defenses based on the statute of limitations with respect to any prosecution of conduct set forth in the attached Statement of the Offense that is not time-barred on the date that this Agreement is signed.

C. Trial Rights

Your client understands that by pleading guilty in this case your client agrees to waive certain rights afforded by the Constitution of the United States and/or by statute or rule. Your client agrees to forego the right to any further discovery or disclosures of information not already provided at the time of the entry of your client's guilty plea. Your client also agrees to waive, among other rights, the right to be indicted by a Grand Jury, the right to plead not guilty, and the

right to a jury trial. If there were a jury trial, your client would have the right to be represented by counsel, to confront and cross-examine witnesses against your client, to challenge the admissibility of evidence offered against your client, to compel witnesses to appear for the purpose of testifying and presenting other evidence on your client's behalf, and to choose whether to testify. If there were a jury trial and your client chose not to testify at that trial, your client would have the right to have the jury instructed that your client's failure to testify could not be held against your client. Your client would further have the right to have the jury instructed that your client is presumed innocent until proven guilty, and that the burden would be on the United States to prove your client's guilt beyond a reasonable doubt. If your client were found guilty after a trial, your client would have the right to appeal your client's conviction. Your client understands that the Fifth Amendment to the Constitution of the United States protects your client from the use of self-incriminating statements in a criminal prosecution. By entering a plea of guilty, your client knowingly and voluntarily waives or gives up your client's right against self-incrimination.

Your client acknowledges discussing with you Rule 11(f) of the Federal Rules of Criminal Procedure and Rule 410 of the Federal Rules of Evidence, which ordinarily limit the admissibility of statements made by a defendant in the course of plea discussions or plea proceedings if a guilty plea is later withdrawn. Your client knowingly and voluntarily waives the rights that arise under these rules in the event your client withdraws your client's guilty plea or withdraws from this Agreement after signing it.

Your client also agrees to waive all constitutional and statutory rights to a speedy sentence and agrees that the plea of guilty pursuant to this Agreement will be entered at a time decided upon by the parties with the concurrence of the Court. Your client understands that the date for sentencing will be set by the Court.

D. Appeal Rights

Your client understands that federal law, specifically 18 U.S.C. § 3742, affords defendants the right to appeal their sentences in certain circumstances. Your client agrees to waive the right to appeal the sentence in this case, including but not limited to any term of imprisonment, fine, forfeiture, award of restitution, term or condition of supervised release, authority of the Court to set conditions of release, and the manner in which the sentence was determined, except to the extent the Court sentences your client above the statutory maximum or guidelines range determined by the Court or your client claims that your client received ineffective assistance of counsel, in which case your client would have the right to appeal the illegal sentence or above-guidelines sentence or raise on appeal a claim of ineffective assistance of counsel, but not to raise on appeal other issues regarding the sentencing. In agreeing to this waiver, your client is aware that your client's sentence has yet to be determined by the Court. Realizing the uncertainty in estimating what sentence the Court ultimately will impose, your client knowingly and willingly waives your client's right to appeal the sentence, to the extent noted above, in exchange for the concessions made by the Government in this Agreement.

E. Collateral Attack

Your client also waives any right to challenge the conviction entered or sentence imposed under this Agreement or otherwise attempt to modify or change the sentence or the manner in which it was determined in any collateral attack, including, but not limited to, a motion brought under 28 U.S.C. § 2255 or Federal Rule of Civil Procedure 60(b), except to the extent such a motion is based on newly discovered evidence or on a claim that your client received ineffective assistance of counsel. Your client reserves the right to file a motion brought under 18 U.S.C. § 3582(c)(2), but agrees to waive the right to appeal the denial of such a motion.

F. Privacy Act and FOIA Rights

ADG
RJS
GF
Your client also agrees to waive all rights, whether asserted directly or by a representative, to request or receive from any department or agency of the United States any records pertaining to the investigation or prosecution of this case, including and without limitation any records that may be sought under the Freedom of Information Act, 5 U.S.C. § 552, or the Privacy Act, 5 U.S.C. § 552a, for the duration of the Special Counsel's investigation.

11. Restitution

Your client understands that the Court has an obligation to determine whether, and in what amount, mandatory restitution applies in this case under 18 U.S.C. § 3663A. The Government and your client agree that mandatory restitution does not apply in this case.

12. Breach of Agreement

Your client understands and agrees that, if after entering this Agreement, your client fails specifically to perform or to fulfill completely each and every one of your client's obligations under this Agreement, or engages in any criminal activity prior to sentencing, your client will have breached this Agreement. In the event of such a breach: (a) the Government will be free from its obligations under this Agreement; (b) your client will not have the right to withdraw the guilty plea; (c) your client will be fully subject to criminal prosecution for any other crimes, including perjury and obstruction of justice; and (d) the Government will be free to use against your client, directly and indirectly, in any criminal or civil proceeding, all statements made by your client and any of the information or materials provided by your client, including such statements, information and materials provided pursuant to this Agreement or during the course of any debriefings conducted in anticipation of, or after entry of, this Agreement, whether or not the debriefings were previously characterized as "off-the-record" debriefings, and including your client's statements made during proceedings before the Court pursuant to Rule 11 of the Federal Rules of Criminal Procedure.

Your client understands and agrees that the Government shall be required to prove a breach of this Agreement only by a preponderance of the evidence, except where such breach is based on a violation of federal, state, or local criminal law, which the Government need prove only by probable cause in order to establish a breach of this Agreement.

Nothing in this Agreement shall be construed to permit your client to commit perjury, to make false statements or declarations, to obstruct justice, or to protect your client from prosecution for any crimes not included within this Agreement or committed by your client after the execution of this Agreement. Your client understands and agrees that the Government reserves the right to prosecute your client for any such offenses. Your client further understands that any perjury, false statements or declarations, or obstruction of justice relating to your client's obligations under this Agreement shall constitute a breach of this Agreement. In the event of such a breach, your client will not be allowed to withdraw your client's guilty plea.

13. Complete Agreement


No agreements, promises, understandings, or representations have been made by the parties or their counsel other than those contained in writing herein, nor will any such agreements, promises, understandings, or representations be made unless committed to writing and signed by your client, defense counsel, and the Special Counsel's Office.

Your client further understands that this Agreement is binding only upon the Special Counsel's Office. This Agreement does not bind any other United States Attorney's Office, nor does it bind any other state, local, or federal prosecutor. It also does not bar or compromise any civil, tax, or administrative claim pending or that may be made against your client.

If the foregoing terms and conditions are satisfactory, your client may so indicate by signing this Agreement and the Statement of the Offense, and returning both to me no later than October 5, 2017 at 2:00 p.m.

Sincerely yours,

/s/
Robert S. Mueller III
Special Counsel

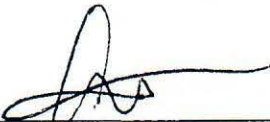
By: 
Jeannie S. Rhee
Andrew D. Goldstein
Aaron S.J. Zelinsky
The Special Counsel's Office

DEFENDANT'S ACCEPTANCE

I have read every page of this Agreement and have discussed it with my attorneys, Thomas M. Breen and Robert W. Stanley. I fully understand this Agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Agreement fully. I am pleading guilty because I am in fact guilty of the offense identified in this Agreement.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this Agreement. I am satisfied with the legal services provided by my attorney in connection with this Agreement and matters related to it.

Date: 10/5/17




George Papadopoulos
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read every page of this Agreement, reviewed this Agreement with my client, George Papadopoulos, and fully discussed the provisions of this Agreement with my client. These pages accurately and completely set forth the entire Agreement. I concur in my client's desire to plead guilty as set forth in this Agreement.

Date: 10/5/17



Thomas M. Breen
Robert W. Stanley
Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

GEORGE PAPADOPOULOS,

Defendant.

Criminal No.: 17 Cr. 182 (RDM) SEALED

Violation: 18 U.S.C. § 1001 (False
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Clerk, U.S. District and
Bankruptcy Courts

STATEMENT OF THE OFFENSE

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America and the defendant, GEORGE PAPADOPOULOS, stipulate and agree that the following facts are true and accurate. These facts do not constitute all of the facts known to the parties concerning the charged offense; they are being submitted to demonstrate that sufficient facts exist that the defendant committed the offense to which he is pleading guilty.

I. Overview

1. The defendant, GEORGE PAPADOPOULOS, who served as a foreign policy advisor for the presidential campaign of Donald J. Trump (the "Campaign"), made material false statements and material omissions during an interview with the Federal Bureau of Investigation ("FBI") that took place on January 27, 2017. At the time of the interview, the FBI had an open investigation into the Russian government's efforts to interfere in the 2016 presidential election, including the nature of any links between individuals associated with the Campaign and the Russian government, and whether there was any coordination between the Campaign and Russia's efforts. The FBI opened and coordinated the investigation in Washington, D.C.

2. Defendant PAPADOPOULOS made the following material false statements and material omissions to the FBI:

a. Defendant PAPADOPOULOS claimed that his interactions with an overseas professor, who defendant PAPADOPOULOS understood to have substantial connections to Russian government officials, occurred before defendant PAPADOPOULOS became a foreign policy adviser to the Campaign. Defendant PAPADOPOULOS acknowledged that the professor had told him about the Russians possessing “dirt” on then-candidate Hillary Clinton in the form of “thousands of emails,” but stated multiple times that he learned that information prior to joining the Campaign. In truth and in fact, however, defendant PAPADOPOULOS learned he would be an advisor to the Campaign in early March, and met the professor on or about March 14, 2016; the professor only took interest in defendant PAPADOPOULOS because of his status with the Campaign; and the professor told defendant PAPADOPOULOS about the “thousands of emails” on or about April 26, 2016, when defendant PAPADOPOULOS had been a foreign policy adviser to the Campaign for over a month.

b. Defendant PAPADOPOULOS further told the investigating agents that the professor was “a nothing” and “just a guy talk[ing] up connections or something.” In truth and in fact, however, defendant PAPADOPOULOS understood that the professor had substantial connections to Russian government officials (and had met with some of those officials in Moscow immediately prior to telling defendant PAPADOPOULOS about the “thousands of emails”) and, over a period of months, defendant PAPADOPOULOS repeatedly sought to use the professor’s Russian connections in an effort to arrange a meeting between the Campaign and Russian government officials.

c. Defendant PAPADOPOULOS claimed he met a certain female Russian national before he joined the Campaign and that their communications consisted of emails such as, “Hi, how are you?” In truth and in fact, however, defendant PAPADOPOULOS met the

female Russian national on or about March 24, 2016, after he had become an adviser to the Campaign; he believed that she had connections to Russian government officials; and he sought to use her Russian connections over a period of months in an effort to arrange a meeting between the Campaign and Russian government officials.

3. Through his false statements and omissions, defendant PAPADOPOULOS impeded the FBI's ongoing investigation into the existence of any links or coordination between individuals associated with the Campaign and the Russian government's efforts to interfere with the 2016 presidential election.

II. Timeline of Selected Events

PAPADOPOULOS's Role on the Campaign

4. In early March 2016, defendant PAPADOPOULOS learned he would be a foreign policy advisor for the Campaign. Defendant PAPADOPOULOS was living in London, England, at the time. Based on a conversation that took place on or about March 6, 2016, with a supervisory campaign official (the "Campaign Supervisor"), defendant PAPADOPOULOS understood that a principal foreign policy focus of the Campaign was an improved U.S. relationship with Russia.

PAPADOPOULOS's Introduction to the Professor and the Female Russian National

5. On or about March 14, 2016, while traveling in Italy, defendant PAPADOPOULOS met an individual who was a professor based in London (the "Professor"). Initially, the Professor seemed uninterested in defendant PAPADOPOULOS. However, after defendant PAPADOPOULOS informed the Professor about his joining the Campaign, the Professor appeared to take great interest in defendant PAPADOPOULOS. Defendant PAPADOPOULOS was interested in the Professor because, among other reasons, the Professor

claimed to have substantial connections with Russian government officials, which defendant PAPADOPOULOS thought could increase his importance as a policy advisor to the Campaign.

6. On or about March 21, 2016, the Campaign told *The Washington Post* that defendant PAPADOPOULOS was one of five named foreign policy advisors for the Campaign.

7. On or about March 24, 2016, defendant PAPADOPOULOS met with the Professor in London. The Professor brought with him a female Russian national (the “Female Russian National”), introduced to defendant PAPADOPOULOS as a relative of Russian President Vladimir Putin with connections to senior Russian government officials.

PAPADOPOULOS Pursues His Contacts with the Professor and the Female Russian National

8. Following his March 24, 2016 meeting with the Professor and the Female Russian National, defendant PAPADOPOULOS emailed the Campaign Supervisor and several members of the Campaign’s foreign policy team and stated that he had just met with his “good friend” the Professor, who had introduced him to the Female Russian National (described by defendant PAPADOPOULOS in the email as “Putin’s niece”) and the Russian Ambassador in London.¹ Defendant PAPADOPOULOS stated that the topic of their discussion was “to arrange a meeting between us and the Russian leadership to discuss U.S.-Russia ties under President Trump.” The Campaign Supervisor responded that he would “work it through the campaign,” but that no commitments should be made at that point. The Campaign Supervisor added: “Great work.”

9. On or about March 31, 2016, defendant PAPADOPOULOS attended a “national security meeting” in Washington, D.C., with then-candidate Trump and other foreign policy

¹ Defendant PAPADOPOULOS later learned that the Female Russian National was not in fact a relative of President Putin. In addition, while defendant PAPADOPOULOS expected that the Professor and the Female Russian National would introduce him to the Russian Ambassador in London, they never did.

advisors for the Campaign. When defendant PAPADOPOULOS introduced himself to the group, he stated, in sum and substance, that he had connections that could help arrange a meeting between then-candidate Trump and President Putin.

10. After his trip to Washington, D.C., defendant PAPADOPOULOS worked with the Professor and the Female Russian National to arrange a meeting between the Campaign and the Russian government, and took steps to advise the Campaign of his progress.

a. In early April 2016, defendant PAPADOPOULOS sent multiple emails to other members of the Campaign's foreign policy team regarding his contacts with "the Russians" and his "outreach to Russia."

b. On or about April 10, 2016, defendant PAPADOPOULOS emailed the Female Russian National, who responded the next day, on or about April 11, 2016, that she "would be very pleased to support your initiatives between our two countries." Defendant PAPADOPOULOS then asked the Female Russian National, in an email cc'ing the Professor, about setting up "a potential foreign policy trip to Russia."

c. The Professor responded to defendant PAPADOPOULOS's email later that day, on or about April 11, 2016: "This is already been agreed. I am flying to Moscow on the 18th for a Valdai meeting, plus other meetings at the Duma." The Duma is a Russian government legislative assembly.

d. The Female Russian National responded: "I have already alerted my personal links to our conversation and your request. . . . As mentioned we are all very excited by the possibility of a good relationship with Mr. Trump. The Russian Federation would love to welcome him once his candidature would be officially announced."

The Professor Introduces PAPADOPOULOS to a Russian National Connected to the Russian Ministry of Foreign Affairs

11. On or about April 18, 2016, the Professor introduced defendant PAPADOPOULOS over email to an individual in Moscow (the “Russian MFA Connection”) who told defendant PAPADOPOULOS he had connections to the Russian Ministry of Foreign Affairs (“MFA”). The MFA is the executive entity in Russia responsible for Russian foreign relations. Over the next several weeks, defendant PAPADOPOULOS and the Russian MFA Connection had multiple conversations over Skype and email about setting “the groundwork” for a “potential” meeting between the Campaign and Russian government officials.

12. On or about April 22, 2016, the Russian MFA Connection sent defendant PAPADOPOULOS an email thanking him “for an extensive talk” and proposing “to meet in London or in Moscow.” Defendant PAPADOPOULOS replied by suggesting that “we set one up here in London with the Ambassador as well to discuss a process moving forward.”

13. On or about April 25, 2016, defendant PAPADOPOULOS emailed a senior policy advisor for the Campaign (the “Senior Policy Advisor”): “The Russian government has an open invitation by Putin for Mr. Trump to meet him when he is ready []. The advantage of being in London is that these governments tend to speak a bit more openly in ‘neutral’ cities.”

PAPADOPOULOS Learns that the Russians Have “Dirt” on Clinton

14. On or about April 26, 2016, defendant PAPADOPOULOS met the Professor for breakfast at a London hotel. During this meeting, the Professor told defendant PAPADOPOULOS that he had just returned from a trip to Moscow where he had met with high-level Russian government officials. The Professor told defendant PAPADOPOULOS that on that trip he (the Professor) learned that the Russians had obtained “dirt” on then-candidate Clinton. The Professor told defendant PAPADOPOULOS, as defendant PAPADOPOULOS

later described to the FBI, that “They [the Russians] have dirt on her”; “the Russians had emails of Clinton”; “they have thousands of emails.”

15. Following that conversation, defendant PAPADOPOULOS continued to correspond with Campaign officials, and continued to communicate with the Professor and the Russian MFA Connection, in an effort to arrange a meeting between the Campaign and the Russian government.

a. For example, the day after his meeting at the hotel with the Professor, on or about April 27, 2016, defendant PAPADOPOULOS emailed the Senior Policy Advisor: “Have some interesting messages coming in from Moscow about a trip when the time is right.”

b. Also on or about April 27, 2016, defendant PAPADOPOULOS emailed a high-ranking official of the Campaign (the “High-Ranking Campaign Official”) “to discuss Russia’s interest in hosting Mr. Trump. Have been receiving a lot of calls over the last month about Putin wanting to host him and the team when the time is right.”

c. On or about April 30, 2016, defendant PAPADOPOULOS thanked the Professor for his “critical help” in arranging a meeting between the Campaign and the Russian government, and remarked: “It’s history making if it happens.”

PAPADOPOULOS Shares Information from the Russian MFA Connection

16. On or about May 4, 2016, the Russian MFA Connection sent an email (the “May 4 MFA Email”) to defendant PAPADOPOULOS and the Professor that stated: “I have just talked to my colleagues from the MFA. The[y] are open for cooperation. One of the options is to make a meeting for you at the North America Desk, if you are in Moscow.” Defendant PAPADOPOULOS responded that he was “[g]lad the MFA is interested.” Defendant PAPADOPOULOS forwarded the May 4 MFA Email to the High-Ranking Campaign Official,

adding: "What do you think? Is this something we want to move forward with?" The next day, on or about May 5, 2016, defendant PAPADOPOULOS had a phone call with the Campaign Supervisor, and then forwarded the May 4 MFA Email to him, adding to the top of the email: "Russia updates."

17. On or about May 13, 2016, the Professor emailed defendant PAPADOPOULOS with "an update" of what they had discussed in their "recent conversations," including: "We will continue to liaise through you with the Russian counterparts in terms of what is needed for a high level meeting of Mr. Trump with the Russian Federation."

18. The next day, on or about May 14, 2016, defendant PAPADOPOULOS emailed the High-Ranking Campaign Official and stated that the "Russian government[] ha[s] also relayed to me that they are interested in hosting Mr. Trump."

19. On or about May 21, 2016, defendant PAPADOPOULOS emailed another high-ranking Campaign official, with the subject line "Request from Russia to meet Mr. Trump." The email included the May 4 MFA Email and added: "Russia has been eager to meet Mr. Trump for quite sometime and have been reaching out to me to discuss."²

20. On or about June 1, 2016, defendant PAPADOPOULOS emailed the High-Ranking Campaign Official and asked about Russia. The High-Ranking Campaign Official referred him to the Campaign Supervisor because "[h]e is running point." Defendant PAPADOPOULOS then emailed the Campaign Supervisor, with the subject line "Re: Messages from Russia": "I have the Russian MFA asking me if Mr. Trump is interested in visiting Russia

² The government notes that the official forwarded defendant PAPADOPOULOS's email to another Campaign official (without including defendant PAPADOPOULOS) and stated: "Let[]s discuss. We need someone to communicate that DT is not doing these trips. It should be someone low level in the campaign so as not to send any signal."

at some point. Wanted to pass this info along to you for you to decide what's best to do with it and what message I should send (or to ignore)."

21. From mid-June through mid-August 2016, PAPADOPOULOS pursued an "off the record" meeting between one or more Campaign representatives and "members of president putin's office and the mfa."

a. For example, on or about June 19, 2016, after several email and Skype exchanges with the Russian MFA Connection, defendant PAPADOPOULOS emailed the High-Ranking Campaign Official, with the subject line "New message from Russia": "The Russian ministry of foreign affairs messaged and said that if Mr. Trump is unable to make it to Russia, if a campaign rep (me or someone else) can make it for meetings? I am willing to make the trip off the record if it's in the interest of Mr. Trump and the campaign to meet specific people."

b. After several weeks of further communications regarding a potential "off the record" meeting with Russian officials, on or about August 15, 2016, the Campaign Supervisor told defendant PAPADOPOULOS that "I would encourage you" and another foreign policy advisor to the Campaign to "make the trip[], if it is feasible."

c. The trip proposed by defendant PAPADOPOULOS did not take place.

III. The Defendant's False Statements to the FBI

22. On or about January 27, 2017, defendant PAPADOPOULOS agreed to be interviewed by agents from the FBI.

23. The agents informed defendant PAPADOPOULOS that the FBI was investigating interference by the Russian government in the 2016 presidential election and whether any individuals related to the Campaign were involved. The agents further informed defendant PAPADOPOULOS that he needed to be truthful and warned that he could get "in trouble" if he

lied. The agents also advised him that lying to them “is a federal offense.” They confirmed that the interview was “completely voluntary.”

24. During the course of the interview, defendant PAPADOPOULOS made numerous false statements and omitted material facts regarding the conduct and communications described above, and, in particular, lied about the extent, timing, and nature of his communications with the Professor, the Female Russian National, and the Russian MFA Connection.

False Statement: PAPADOPOULOS Met the Professor and Learned About Russian “Dirt” Before He Joined the Campaign

25. During his interview with the FBI, defendant PAPADOPOULOS acknowledged that he met the Professor and that the Professor told him the Russians had “dirt” on then-candidate Clinton in the form of “thousands of emails,” but defendant PAPADOPOULOS stated multiple times that those communications occurred prior to when he joined the Campaign. Defendant PAPADOPOULOS told the FBI: “This isn’t like he [the Professor]’s messaging me while I’m in April with Trump”; “I wasn’t even on the Trump team, that wasn’t even on the radar”; “I wasn’t even on Trump’s orbit[] at this time”; and “This was a year ago, this was before I even got with Trump.” He also said it was a “very strange coincidence” to be told of the “dirt” before he started working for the Campaign.

26. In truth and in fact, however, and as set forth above, defendant PAPADOPOULOS met the Professor for the first time on or about March 14, 2016, after defendant PAPADOPOULOS had already learned he would be a foreign policy advisor for the Campaign; the Professor showed interest in defendant PAPADOPOULOS only after learning of his role on the Campaign; and the Professor told defendant PAPADOPOULOS about the Russians possessing “dirt” on then-candidate Clinton in late April 2016, more than a month after defendant PAPADOPOULOS had joined the Campaign.

False Statement: PAPADOPOULOS's Contacts with the Professor Were Inconsequential

27. During his interview with the FBI, defendant PAPADOPOULOS also made false statements in an effort to minimize the extent and importance of his communications with the Professor. For example, defendant PAPADOPOULOS stated that “[the Professor]’s a nothing,” that he thought the Professor was “just a guy talk[ing] up connections or something,” and that he believed the Professor was “BS’ing to be completely honest with you.”

28. In truth and in fact, however, defendant PAPADOPOULOS understood the Professor to have substantial connections to high-level Russian government officials and that the Professor spoke with some of those officials in Moscow before telling defendant PAPADOPOULOS about the “dirt.” Defendant PAPADOPOULOS also engaged in extensive communications over a period of months with the Professor regarding foreign policy issues for the Campaign, including efforts to arrange a “history making” meeting between the Campaign and Russian government officials.

29. In addition, defendant PAPADOPOULOS failed to inform investigators that the Professor had introduced him to the Russian MFA Connection, despite being asked if he had met with Russian nationals or “[a]nyone with a Russian accent” during the Campaign. Indeed, while defendant PAPADOPOULOS told the FBI that he was involved in meetings and did “shuttle diplomacy” with officials from several other countries during the Campaign, he omitted the entire course of conduct with the Professor and the Russian MFA Connection regarding his efforts to establish meetings between the Campaign and Russian government officials.

False Statement: PAPADOPOULOS Met the Female Russian National Before He Joined the Campaign, and His Contacts with Her Were Inconsequential

30. During his interview with the FBI, defendant PAPADOPOULOS also falsely claimed that he met the Female Russian National before he joined the Campaign, and falsely told the FBI that he had “no” relationship at all with the Female Russian National. He stated that the extent of their communications was her sending emails – “Just, ‘Hi, how are you?’” “That’s it.”

31. In truth and in fact, however, defendant PAPADOPOULOS met the Female Russian National on or about March 24, 2016, after he had joined the Campaign; he believed that the Female Russian National had connections to high-level Russian government officials and could help him arrange a potential foreign policy trip to Russia; and during the Campaign he emailed and spoke over Skype on numerous occasions with the Female Russian National about the potential foreign policy trip to Russia.

IV. Events Following PAPADOPOULOS’s January 27, 2017 Interview with the FBI

32. The FBI interviewed defendant PAPADOPOULOS again on February 16, 2017. His counsel was present for the interview. During the interview, defendant PAPADOPOULOS reiterated his purported willingness to cooperate with the FBI’s investigation.


33. The next day, on or about February 17, 2017, defendant PAPADOPOULOS deactivated his Facebook account, which he had maintained since approximately August 2005 and which contained information about communications he had with the Professor and the Russian MFA Connection. Shortly after he deactivated his account, PAPADOPOULOS created a new Facebook account that did not contain the communications with the Professor and the Russian MFA Connection.

34. On or about February 23, 2017, defendant PAPADOPOULOS ceased using his cell phone number and began using a new number.

35. On July 27, 2017, defendant PAPADOPOULOS was arrested upon his arrival at Dulles International Airport. Following his arrest, defendant PAPADOPOULOS met with the Government on numerous occasions to provide information and answer questions.

ROBERT S. MUELLER, III
Special Counsel

By:



Jeannie S. Rhee
Andrew D. Goldstein
Aaron S.J. Zelinsky
The Special Counsel's Office

DEFENDANT'S ACCEPTANCE

The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to the charge against me. It does not include all of the facts known to me regarding this offense. I make this statement knowingly and voluntarily and because I am, in fact, guilty of the crime charged. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of the Offense fully.

I have read every word of this Statement of the Offense, or have had it read to me. Pursuant to Federal Rule of Criminal Procedure 11, after consulting with my attorney, I agree and stipulate to this Statement of the Offense, and declare under penalty of perjury that it is true and correct.

Date: 10/5/17

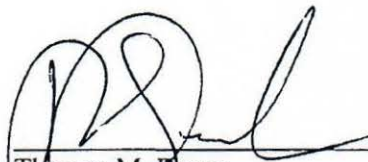


George Papadopoulos
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of the Offense, and have reviewed it with my client fully. I concur in my client's desire to adopt and stipulate to this Statement of the Offense as true and accurate.

Date: 10/5/17



Thomas M. Breen
Robert W. Stanley
Attorneys for Defendant