

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INFORMATION

UNITED STATES OF AMERICA :

20 Cr. ___ ()

- v. - :

IMAAD ZUBERI, :

Defendant. :

20 CRIM 011

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Count One
(Obstruction of Justice)

The United States Attorney charges:

1. The charge herein stems from an effort by IMAAD ZUBERI, the defendant, to obstruct a federal grand jury investigation into the source of funds used by ZUBERI to make a substantial donation to the 58th Presidential Inaugural Committee, a 501(c)(4) organization formed to support the 2017 inauguration of President Donald J. Trump (the "PIC"). As detailed below, upon learning of that investigation, ZUBERI took numerous steps, including reimbursing one source of those funds via a back-dated check, to obstruct the federal criminal investigation.

2. At all relevant times, IMAAD ZUBERI, the defendant, was a significant donor to political candidates and campaigns, making millions of dollars in contributions in his name, the name of his spouse, and the name of his venture capital firm, Avenue Ventures, to various political candidates and committees.

3. On or about December 27, 2016, IMAAD ZUBERI, the defendant, made a \$900,000 donation to the PIC. Although ZUBERI made the donation to the PIC in the name of "Avenue Ventures," the donation was in fact funded using money obtained from other sources, including a United States national ("Donor-1").

4. In particular, in or about November 2016, IMAAD ZUBERI, the defendant, asked Donor-1 to make a substantial donation to the PIC, promising Donor-1, in return, exclusive access to certain inaugural events. On or about November 15, 2016, Donor-1 gave ZUBERI a \$50,000 check. At ZUBERI's request, Donor-1 made the check out to Avenue Ventures. However, Donor-1 wrote "Inauguration 17" in the memo line of the check to make clear that it was intended as a donation to the PIC, and Donor-1 understood that ZUBERI would report Donor-1's donation as such.

5. IMAAD ZUBERI, the defendant, did not in fact inform the PIC or the Federal Election Commission that certain of the funds for his \$900,000 donation came from others, including Donor-1.

6. Donor-1 subsequently decided not to attend the inaugural ceremonies and demanded that IMAAD ZUBERI, the defendant, return the \$50,000 to him. ZUBERI did not initially do so.

7. On or about February 5, 2019, media organizations reported that a federal grand jury in the Southern District of New York had served the PIC with a grand jury subpoena and that prosecutors were investigating the source of funds donated to the PIC, including any foreign sources (the "SDNY Investigation"). In particular, those reports indicated that IMAAD ZUBERI, the defendant, and Avenue Ventures were the only donors named in the subpoena and that ZUBERI's \$900,000 donation to the PIC was being "scrutinized by federal prosecutors in the Southern District of New York."

8. In or about February 2019, shortly after the reports of the SDNY Investigation involving the PIC and the donation made by IMAAD ZUBERI, the defendant, ZUBERI asked Donor-1 to meet him in person.

9. On or about February 25, 2019, IMAAD ZUBERI, the defendant, met with Donor-1 at a restaurant in California. At this meeting, ZUBERI and Donor-1 discussed the SDNY Investigation, and ZUBERI asked Donor-1, in substance, whether he had been contacted by federal investigators. During the meeting, Donor-1 asked ZUBERI to refund the \$50,000 that Donor-1 had given ZUBERI as an intended donation to the PIC. ZUBERI initially refused to do so. However, when Donor-1 reminded ZUBERI that Donor-1 had written on the check itself "Inauguration 17," ZUBERI promptly

agreed to repay Donor-1. ZUBERI then wrote a check to Donor-1 for \$50,000, indicating in the memo line that it was a "refund."

10. Moreover, although IMAAD ZUBERI, the defendant, wrote the check on February 25, 2019, *i.e.*, the date of the meeting described above, ZUBERI back-dated the refund check to February 1, 2019, in order to make it appear that ZUBERI had returned Donor-1's money before he learned of the SDNY Investigation into the source of funds for the \$900,000 PIC donation.

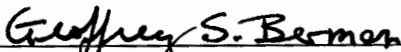
11. In addition, IMAAD ZUBERI, the defendant, intentionally deleted emails with individuals who provided money to ZUBERI at and around the time of his \$900,000 donation to the PIC, including emails with a foreign national ("Donor-2") who transferred approximately \$5.8 million to the account ZUBERI used to fund the PIC donation at and around the time the donation was made. Moreover, on or about July 30, 2019, after federal prosecutors informed ZUBERI, through counsel that they believed that ZUBERI had intentionally deleted pertinent emails with Donor-2, ZUBERI contacted his email service provider and asked, in substance, how to ensure that copies of his emails were not stored on a server.

Statutory Allegations

12. On or about February 25, 2019, in the Southern District of New York and elsewhere, IMAAD ZUBERI, the defendant,

corruptly did alter, destroy, mutilate and conceal a record, document, and other object, and did attempt to do so, with the intent to impair the object's integrity and availability for use in an official proceeding, and did otherwise obstruct, influence, and impede an official proceeding, and did attempt to do so, to wit, ZUBERI attempted to conceal \$50,000 that he had used to make a donation to the PIC but had failed to properly disclose by returning the money to Donor-1 and back-dating the refund check to make it appear that the money had been refunded before ZUBERI learned of the federal investigation into his donation.

(Title 18, United States Code, Sections 1512(c) and 2.)



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