

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

PRINCE ASIEL BEN ISRAEL and
C. GREGORY TURNER,
also known as "Greg Turner"

UNDER SEAL

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: From in or about November 2008 to in or about January 2010, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, PRINCE ASIEL BEN ISRAEL and C. GREGORY TURNER, also known as "Greg Turner," defendants herein:

willfully conspired to provide services on behalf of and for the benefit of Specially Designated Nationals Robert Mugabe and Gideon Gono without first having obtained a license from the U.S. Department of the Treasury;

in violation of Title 50, United States Code, Section 1705(c), and Title 31, Code of Federal Regulations, Sections 541.201, 541.204, and 541.405. I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant
STEVEN D. NOLDIN
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

July 16, 2013 at Chicago, Illinois
Date City and State

Young B. Kim, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer

knowledge, information provided to me by other law enforcement agents, and my review of emails and other documents.

3. As detailed below, Ben Israel and Turner, who are United States citizens and Chicago residents, violated IEEPA by:

a. Engaging in public relations, political consulting, and lobbying efforts on behalf of Zimbabwe president and Specially Designated National Robert Mugabe and other Zimbabwe officials pursuant to a “Consulting Agreement”;

b. Agreeing to be paid approximately \$3.4 million for these efforts;

c. Attempting to receive these payments, including a \$89,970 wire transfer to a bank account in the United States;

d. Arranging for trips by federal and state government officials to meet with Mugabe and other Zimbabwe officials, including in November 2008, December 2008, January 2009, August 2009, and December 2009;

e. Attempting to have Specially Designated National Gideon Gono, Governor of the Reserve Bank of Zimbabwe, and other Zimbabwe officials speak at an issues forum sponsored by a U.S. Representative in Washington, D.C., and assisting those officials in obtaining visas to travel to the United States to attend the event;

f. Arranging for Mugabe to meet with federal and state government officials in New York;

g. Lobbying a caucus of state legislators on behalf of Zimbabwe officials; and

h. Failing to apply to the Department of Treasury for a license to engage in transactions with and services on behalf of Specially Designated Nationals.

Background of the Sanctions Against Zimbabwe

4. IEEPA, among other things, provides the President with the authority, under such regulations as he may prescribe, to declare economic emergencies and prohibit certain transactions by any person or certain transactions with respect to any property subject to the jurisdiction of the United States. 50 U.S.C. § 1702. It is a felony for anyone to willfully commit, attempt to commit, or conspire to commit, or aid and abet in the commission of a violation of any regulation or prohibition issued pursuant to IEEPA. 50 U.S.C. § 1705(c).

5. Zimbabwe is located in southeast Africa. According to the Central Intelligence Agency's World Factbook: Zimbabwe has been ruled by its president, Robert Mugabe, since its independence in 1980; Mugabe and his ruling ZANU-PF party have used fraud, violence, intimidation, and vote rigging to maintain control of the government in the last decade. Moreover, according to a report

from the Center for Strategic and International Studies, Mugabe uses funds from Zimbabwe's industries, particularly the diamond trade, to enrich himself and his family and to purchase the loyalty of subordinates. In February 2009, Mugabe agreed to share power with the opposition party leader, Morgan Tsvangirai. According to the CIA's publication of world leaders, Gideon Gono is the Governor of the Reserve Bank of Zimbabwe, which is the government of Zimbabwe's central bank.

6. The United States legislative and executive branches have passed laws, issued orders, and implemented regulations to sanction certain Zimbabweans. Specifically, in December 2001, Congress passed, and the President signed into law, the Zimbabwe Democracy and Economic Recovery Act (ZDERA), which asked the President to, among other things: (a) identify individuals responsible for the breakdown of the rule of law, politically motivated violence, and intimidation in Zimbabwe; (b) identify these individuals' assets held outside of Zimbabwe; and (c) implement travel and economic sanctions against these individuals and their associates and families. Pub. L. 107-99. 115 Stat. 962.

7. On March 6, 2003, President George W. Bush signed Executive Order 13288, which, among other things, blocked all property of certain Zimbabweans ("Specially Designated Nationals") from being "transferred, paid,

exported, withdrawn, or otherwise dealt in.” The President declared a national emergency and blocked the property of persons undermining democratic processes or institutions in Zimbabwe, pursuant to IEEPA. As reflected in the Executive Order, the President took notice of “the unusual and extraordinary threat to the foreign policy of the United States” constituted by “the actions and policies of certain members of the Government of Zimbabwe and other persons to undermine Zimbabwe’s democratic processes or institutions, contributing to the deliberate breakdown in the rule of law in Zimbabwe, to politically motivated violence and intimidation in that country, and to political and economic instability in the southern African region.”

8. On November 22, 2005, President George W. Bush signed Executive Order 13391, which expanded the list of Zimbabweans and added Zimbabwe entities whose financial transactions were to be blocked in the United States. On July 25, 2008, President George W. Bush signed Executive Order 13469, which further expanded the list of individuals and entities whose financial transactions were to be blocked by the United States. On or about March 4, 2009, March 1, 2010, March 2, 2011, March 2, 2012, and March 1, 2013, President Barack Obama continued the Executive Orders for one-year periods. *See* 78 FR 14427. These Executive Orders delegate to the United States Treasury Department, in consultation with the United States Secretary of State, the power to name

additional Specially Designated Nationals with whom United States persons may not engage in financial transactions. Among those Specially Designated Nationals are: Robert Mugabe and Gideon Gono.

9. Under 31 CFR § 541.201 *et seq.*, certain property of Zimbabweans listed in an Executive Order or determined by the Secretary of Treasury are blocked. Pursuant to 31 CFR § 541.405, this prohibition applies to services performed in the United States or by U.S. persons, wherever located, on behalf of or for the benefit of a Zimbabwean whose property or interests in property are blocked by 31 § CFR 541.201.

Ben Israel and Turner Agree to Provide Public Relations, Political Consulting, and Lobbying Services to Mugabe, Gono, and Other Specially Designated Nationals to Have Sanctions Lifted

10. As detailed below, Ben Israel and Turner met with Mugabe, Gono, and other Specially Designated Nationals in Zimbabwe. Evidence shows that in these meetings, Ben Israel and Turner agreed to engage in public relations, political consulting, and lobbying efforts to have the sanctions removed in exchange for a promise of approximately \$3.4 million. These efforts included Ben Israel and Turner: (1) convincing and attempting to convince U.S. federal and state public officials to oppose the sanctions; (2) arranging for meetings between U.S. federal and state public officials and high ranking members of the Zimbabwe government in Africa and in the U.S. to discuss the removal of

sanctions; and (3) attempting to assist Zimbabwe officials in obtaining visas to travel to the United States to discuss the removal of sanctions against Zimbabwe.

**Defendants Arrange a November 2008 Trip by
Illinois State Senator A to Meet Mugabe**

11. Evidence shows that in early November 2008, Ben Israel and Turner began having discussions with Mugabe, Gono, and other high-ranking ZANU-PF leaders regarding the influence Ben Israel and Turner could have in efforts to have the sanctions removed. Ben Israel and Turner discussed with Mugabe, Gono, and others their association with many public officials who purportedly had close connections with then President Elect Barack Obama. More specifically:

12. On November 2, 2008, Turner sent an email informing one of his associates that State Senator A, an Illinois State Senator, would be arriving in Johannesburg, South Africa for “economic development” meetings, including discussions on using Illinois’ pension funds to invest in mining.¹ According to

¹ A variety of sources, including Turner’s passport application and the subscriber name on the email account, show that Turner used the account referenced in this Affidavit. Other evidence, including travel records, shows that Ben Israel used the email account referenced in this Affidavit. For purposes of this affidavit, I presume that all emails sent from an individual’s account were sent by the account’s user. For emails sent from Turner’s account specifically, I believe this to be the case based on the consistent spelling errors and use of similar terms in the emails. I also know of no evidence that anyone other than Turner used this email account.

records, State Senator A traveled from the United States to Africa on November 5, 2008, and returned on November 11, 2008.

13. Turner sent an email to the same associate on November 10, 2008, informing him that Turner had a one-hour meeting with Robert Mugabe and State Senator A. The email stated that Turner and State Senator A “now understand the issues and will convey back to the President Elect.”

14. A few days later, Turner sent an email to the same associate and said, “As you can see my Lobby with Zim is strong.” The email attached a letter from Simon Khaya Moyo, then Zimbabwe’s Ambassador to South Africa, to Turner.² In the letter, Moyo thanked Turner and Ben Israel for facilitating the meeting with State Senator A. The letter stated that Mugabe was “equally impressed with the concern expressed by the Prince [Ben Israel] and [State Senator A].” The letter continued that they “look[ed] forward to working closely with the Chicago Lobby Team and following up on the proposals presented to the President [Mugabe].”³

² Moyo was designated as a Specially Designated National on March 10, 2003.

³ Throughout this affidavit, I have not corrected grammatical, spelling, or formatting errors in the original emails that I have quoted. Where an email was written in all capital letters, I have included this formatting in the quotes. My description of emails and other documents are based on my review and my understanding of the context of the documents based on the FBI’s investigation and my discussion with other agents. Where I have put comments in brackets, those comments are my understanding of the communication.

Defendants Begin to Arrange a Second Meeting with Illinois Legislators

15. On November 17, 2008, Turner sent an email to Individual A, who was Ben Israel's assistant. Turner stated that there was a "follow up meeting" in Harare, Zimbabwe and, based on that meeting, Turner felt that they should "pursue the route we can best control. The State House and Senate can be our Lobby begining without drawing too many eyes." The email said that they should see if State Senator A could "get 2 to 3 members of the house" and others to travel to Harare in the coming weeks for a "fact finding vacation." According to the email, the budget for the trip "would be (\$ 250.000) (\$ 150.000) for the MOI coordinators. We would cover all expenses from London on to Harare including ground arraingments."

16. On November 19, 2008, Turner sent an email to Zimbabwe Official A, who was Zimbabwe's Ambassador to China and a member of Mugabe's ZANU-PF party. Turner asked Zimbabwe Official A to review and provide feedback on an itinerary for State of Illinois officials to travel to Zimbabwe in December 2008. The itinerary showed that State Senator A would lead the group's visit, and that the agenda would include discussions of: (1) a donation of surplus grain from the State of Illinois Commodities Board; (2) the feasibility of establishing a trade office for agriculture between the State of

Illinois and Zimbabwe; (3) the potential of pension fund investments in a newly established Zimbabwe stock exchange and other projects; and (4) providing Zimbabwe with medical supplies from the State of Illinois. The attachment showed that the host would be Emmerson Mnangwa, who was Zimbabwe's Minister of Rural Housing and Social Amenities, a member of ZANU-PF, and a Specially Designated National since March 10, 2003.

17. On November 20, 2008, Turner sent an email asking Ben Israel to have State Senator A issue a letter to Gideon Gono, the governor of the Reserve Bank of Zimbabwe. Turner provided a draft of the letter to Gono, which mentioned the "crisis Bush Sanctions has placed on your nation and yourself as Govonor of the Reserve Bank." The draft stated that State Senator A hoped that the election of President Obama would cause the U.S. to take "a new and fresh look" at the situation. The draft letter mentioned a potential State of Illinois trade office in Zimbabwe and assistance in Zimbabwe's recovery of its mineral and agricultural sectors. The draft letter also mentioned that State Senator A wanted to meet Gono during State Senator A's upcoming travel to Harare. On November 22, 2008, Individual A emailed Turner "per Prince Asiel . . . a scanned copy of the official letter written by [State Senator A]."

18. On November 24, 2008, Turner sent an email to Moyo stating that “we are moving on and want you with us every step of the way.”⁴ The next steps will be forwarded to you from the Presidents [Mugabe’s] office soon.” The email stated that “[t]he Senator [State Senator A] sends his personal greetings and has done some great follow up work.” The email informed Moyo that Turner would be in South Africa and would fill Moyo in on the “nexp phase of our plans.”

The Consulting Agreement

19. Based on my review of a contract that Ben Israel provided to a U.S. bank, Ben Israel entered into a “Consulting Agreement” with Zimbabwe Official B on November 26, 2008. The Agreement called for Ben Israel to work as an “Independent contractor” for an entity not named in the Agreement, and to render services for a period of twelve months, commencing on the Agreement’s execution date of November 26, 2008. According to the contract, in exchange for these services, Ben Israel would be paid \$3,405,000 in four installments: (1) \$90,000 at the signing of the contract; (2) \$1,105,000 upon completion of the “Zimbabwe meeting (date to be determined);” (3) \$1,105,000 “upon completion of the South Africa meeting;” and (4) \$1,105,000 “upon completion of” the project. The contract stated that “[t]he project will be considered complete when the

⁴ I believe this email was sent to Moyo’s email address based in part on other emails Turner sent “To: S K Moyo.” The properties of these other emails show that the recipient’s display name was S K Moyo for this email account.

written report is submitted.” At the time the Agreement was executed, Zimbabwe Official B was the spouse of Zimbabwe Official A and was a Zimbabwean senator affiliated with ZANU-PF.

20. On November 29, 2008, Turner sent an email to Individual A. In the email, Turner asked Individual A to forward wire transfer information for Ben Israel regarding the trip of the “Chicago Deligation” in December 2008. Turner also asked for biographies and topics “to be discussed with His Excellency [Mugabe] and the Govonor of the Reserve Bank [Gono].” The email stated that the topics should include: (1) humanitarian grain from Illinois; (2) emergency medical supplies from Cook County; (3) the establishment of a new stock exchange; (4) the formation of a permanent “Advisory group to Remove the Economic sanctions”; and (5) the establishment of “a back chanel communications to the President Elect.” The email stated that the transfer would occur in “on Tues[day] Morning Latest \$80.000 USD” and that “Additional Funding” would be “discussed on Monday.”

21. Bank records show that on or about December 5, 2008, Ben Israel’s account at the U.S. bank received a wire transfer of \$89,970 from Zimbabwe Official B in Zimbabwe. According to the U.S. bank, Ben Israel informed the bank that the wire transfer represented reimbursement of expenses incurred over the last eight months from a non-profit that Ben Israel helped establish in

Zimbabwe. The bank reported that Ben Israel provided the Agreement referenced above as proof of his relationship with the non-profit. The bank found, however, that this Agreement was not consistent with Ben Israel's explanation of the reason for the wire transfer because: (a) Ben Israel said the funds related to reimbursement of eight months of expenditures, but the contract was dated only two weeks before the wire transfer; (b) the agreement did not reference any businesses or non-profit organizations, yet Ben Israel specifically mentioned a non-profit organization; and (c) the contract stated that Ben Israel would be receiving a total of \$3,405,000 in fees from the "client," rather than a one time payment for reimbursement of expenses. After determining that Zimbabwe Official B was affiliated with ZANU-PF, Mugabe's ruling party, the bank stopped the wire transfer.

**State of Illinois Officials Meet with
Zimbabwe Leaders in December 2008**

22. From November through December 2008, Turner, Ben Israel, and Individual A arranged for Ben Israel, State Senator A, and State Representative A, who is a State of Illinois Representative, to travel to South Africa in early December 2008. Turner asked a colleague in Zimbabwe to have the "AMB [either Moyo or Zimbabwe Official A] MEET OUR FLIGHT AT THE DOOR SO WE CAN CLEAR QUICK AND QUIETLY PROCEED TO OUR RESTING PLACE."

23. Travel records show that State Senator A and State Representative A traveled from the U.S. to Israel on December 1, 2008, and were to return to the U.S. from Israel on December 8, 2008, based on a trip arranged for and paid by a U.S. organization. Records show, however, that they did not return as scheduled. Instead, State Representative A returned to the United States on a different airline on December 12, 2008, after records showed he was in South Africa. State Senator A returned to the U.S. on a flight from Amsterdam on December 12, 2008.

24. On or about December 15, 2008, a scheduler for President Elect Obama's transition team sent an email to another member of the transition team stating that State Representative A "wants a phone call from [transition team officials] regarding a meeting he had last week in Zimbabwe. I am not sure who to pass this on to but it's the second time they have called." The transition team forwarded this email to the FBI based on its concerns that State Representative A had violated sanctions in his travels to Zimbabwe.⁵

⁵ Although the transition team believed that State Representative A may have violated IEEPA simply by traveling to Zimbabwe, the sanctions neither bar travel to Zimbabwe nor prohibit public officials from meeting with Specially Designated Nationals to discuss the removal of sanctions. Individuals may not, however, provide lobbying, public relations, and media consulting services on behalf of or for the benefit of Specially Designated Nationals, without first having obtained a license from the U.S. Department of the Treasury.

**Turner and Ben Israel Plan Trips for State Senator A and
State Representative A to Travel to Zimbabwe in January 2009**

25. On January 13, 2009, Turner emailed Gono's assistant a letter from State Representative A to then President Elect Obama. In the letter, State Representative A thanked then President Elect Obama for purportedly giving State Representative A the opportunity to speak with him and allowing State Representative A to share "details of my recent humanitarian mission to Zimbabwe . . . and my meeting with President Mugabe." The letter stated that Mugabe has a "strong, sincere desire to connect with" the then President Elect. The letter further stated that State Representative A had spoken with Gono, "who explained hardships that the sanctions have caused."

26. Also on January 13, 2009, Turner forwarded to Gono's assistant a letter from State Senator A to Mugabe. In the letter, State Senator A said that "after further discussions" with Ben Israel, State Senator A was "prepared to lead a delegation of elected officials to Zimbabwe" from January 23-26, 2009. State Senator A wrote that the delegation would "serve as a support group to lobby for President-Elect Barack Obama to enter into discussions with President Mugabe, with no preconditions, to discuss the country of Zimbabwe and its current relationship with the United States of America." In the letter, State

Senator A said that he would forward the names and itinerary as soon as he learned that the travel dates were amenable to Mugabe.

27. It appears that State Senator A received confirmation from Mugabe regarding the travel dates because State Senator A was one of a group of public officials who were scheduled to travel to Zimbabwe on January 23, 2009. On January 22, 2009, Turner emailed Gono's assistant regarding the delegation's arrival the next day. Turner sent another email the following day, which contained a "CONFIDENTIAL MEMO" from Turner to Gono. According to the memo, the delegation was the "PHASE THREE VISIT TO ZIMBABWE." The memo further stated that Ben Israel would be arriving later that night with a State of Illinois public official, and that Ben Israel wanted to provide Gono with an update on the team's progress. The memo said that State Senator A and State Representative A would follow Ben Israel to Zimbabwe and would provide "A FIRST HAND REPORT ON THE PROGRESS MADE AND THE STRATEGY RECOMMENDED."

28. It appears State Senator A canceled his trip to Zimbabwe. Travel records show that State Representative A, however, did travel to Africa during this time. The records show that State Representative A left the U.S. for Johannesburg on January 24, 2009, and returned to the U.S. from Senegal on January 31, 2009.

29. On February 5, 2009, State Representative A emailed Ben Israel and two individuals that had Reserve Bank of Zimbabwe email addresses with “an update on progress here in the U.S.” One of the Reserve Bank of Zimbabwe email addresses is listed as Gono’s email address in his visa applications I have reviewed. In the email, State Representative A stated, “[w]e are presenting a Joint House and Senate Resolution requesting the elimination of the U.S. Sanctions against Zimbabwe immediately.” The email said that State Representative A was “advising President Barack Obama, the State Department and his foreign policy team the strong sense of urgency to move ahead within a short time frame.”

Turner Seeks Payments from the Reserve Bank of Zimbabwe

30. Around this time, Turner was seeking payment from the Reserve Bank of Zimbabwe. On February 9, 2009, Turner received an email from an associate, Individual B, who informed Turner that “We met with the bank today and cleared the transaction amount . . . there is no problem with the Transfer they are expecting it.” Individual B informed Turner that they “must provide an invoice stating our services rendered for payment. When you are prepared to send the wire we will officially notify the bank and present the invoice for payment.” Turner responded in a February 11, 2009 email, “Good Show will call from Harare tomorrow with Invoice for Media Consulting to the Reserve Bank

of Zim.” On February 24, 2009, Turner sent an email stating that both he and Ben Israel were planning to go back to Harare to bring closure to their “Gono Project.”

31. On March 2, 2009, Turner received an email from an individual attaching “total billing” from a Zimbabwe hotel. It appears that Turner had requested that the hotel charge the Reserve Bank of Zimbabwe for part of the bill. The sender of the email stated that “they have split the bill as per your [Turner’s] instructions and await my response on how this will be settled.” The individual said that “[t]hey have not provided their South African banking details and therefore I assume that they would prefer settlement here in Harare.” The individual informed Turner that she had not “communicated with the Reserve Bank as yet.” Turner responded the next day stating, “I told you the Bank will take care when I come.” After continued delay in payment, the hotel contacted the U.S. Embassy in Zimbabwe. According to U.S. Department of State records, a manager of a Zimbabwe hotel contacted the Embassy on April 21, 2009, to ask about the bill. According to the records, the manager said “that a group of four Americans on U.S. Embassy business that was hosted by another American named Greg Turner had departed the country without paying the remainder of their hotel bill.” The report listed three of the individuals as State Representative A, State Senator A, and “Prince Azil [Ben Israel].” The manager

stated that the group was “driven around with drivers and vehicles from the Reserve Bank of Zimbabwe” and that “there was an actual logo on at least some of the vehicles.”

Ben Israel and Turner Try to Form a Joint Venture with a South African Diamond Executive and Sanctioned Entities; President Obama Extends the Sanctions

32. Emails show that beginning as early as February 2009, Turner and Ben Israel attempted to form a joint venture with companies controlled by the government of Zimbabwe and Individual C, who is a diamond executive from South Africa.

33. On February 6, 2009, Individual C emailed a letter to Turner. The letter referenced a meeting in which Individual C and Turner discussed Zimbabwe’s diamond resources and “maximising the benefits of the resource for the country.” Individual C said that Turner had requested that Individual C “enter into talks with the relevant persons” and that Individual C was “more than willing to do so.” Individual C also attached an article detailing the Zimbabwe government’s killing of miners so it could take over the diamond mines and the illegal smuggling of Zimbabwe’s diamonds. Turner forwarded this email and its attachments to Ben Israel.

34. Turner responded to Individual C the next day stating, “I am meeting with Govonor Gono tomorrow morning and will set the stage for a

serious meeting to map out a plan of action. I will also forward a basic memo on our working agreement ect.” On February 21, 2009, Turner emailed Individual C and stated that he was “working on the Zimbabwe meetings this week.” Turner claimed to have a “good intro to the New Minister of Mines as well as the Govonor.”

35. On February 27, 2009, Turner informed Individual C that he would be in Zimbabwe by March 15 to “lin[e] up our meeting with Govonor Gono.” Two days later, on March 1, 2009, Turner sent an email to Gono’s assistant to ask for a meeting between Gono and Individual C. Turner stated that “if the Govonor approves we could met with the New Minister of Mines.” Turner said that Individual C “was on the Kimberly inspection team that came to Zimbabwe last year.”

36. Also on March 1, 2009, Turner asked Gono’s assistant to pass a note on to Gono from Turner that “our promise to you will not fall to the Ground Prince [Ben Israel] and the Team has been doing some serious ground work in Washington. We remain committed to Govonor Gono.” Turner stated that “the MDC [ZANU-PF’s political rival] does not have the relationships at our level in the Obama Adminastration (forsure).” Turner claimed to have added two “serious members to our Team from the Bush adminastration who have confessed they were Used tools to destroy Zimbabwe and the President. They are

ready to correct the record.” Turner said that they wanted Gono “to know that the Chicago connection NEVER Surrenders or forget its Friends.” Turner stated that the email was from “Prince, [State Senator A], [State Representative A], and Yours Truly.”

37. On March 2, 2009, Turner forwarded an email from Individual C to Gono’s assistant. Turner stated that Individual C was the person that Turner wanted “to bring down to meet with [Gono] confidentially.” Turner wrote that there was “a world shortage” of diamonds and “if they close Zim out of the Kimberly Process the trade will be Blackmarket only. Individual C can help clean up the trade to benefit Government and the people.” The original email from Individual C attached an article on Zimbabwe’s human rights abuses and its failed diamond trade. Turner also forwarded the Individual C email to Ben Israel.

38. Despite the efforts of Ben Israel and Turner, on March 4, 2009, President Obama continued the sanctions via Executive Order for one year. Five days later, Turner emailed Gono’s assistant with a letter to Gono saying that “Our Brother did what he politically had to do.” Despite the lack of success, on March 18, 2009, Turner emailed a Zimbabwe associate saying that Ben Israel would be arriving “to see how we can close out our business with Dr. Gono.”

39. Meanwhile, Individual C and Turner continued to take steps to form

the Zimbabwe diamond joint venture. On April 1, 2009, Individual C forwarded to Turner another article detailing the government of Zimbabwe's human rights abuses and its inability to mine its diamond fields. On April 8, 2009, Individual C emailed Turner stating, "further to our discussion today . . . regarding the various Zimbabwean initiatives, please be advised that I see this as a joint venture between you and I. I am optimistic that the various meetings we will be having with the relevant entities in Zimbabwe will be fruitful and will result in a positive outcome for ourselves and Zimbabwe." Turner forwarded this email to Ben Israel and added, "Here we go Soldier."

40. Also on April 8, 2009, Turner emailed Gono's assistant two attachments with the request that she "Please pass to the Boss ASAP we arrive tomorrow morning. HIS TEAM REMAIN LOYAL AND READY." The attachments were: (1) the cover of a business journal featuring Individual C; and (2) Individual C's curriculum vitae.

41. On April 12, 2009, Turner emailed the Zimbabwe Minister of Mines, thanking him on "behalf of [Individual C] and Myself . . . for the quality time spent last week." Turner said that he encouraged Individual C:

to come over and see if we could assist your new administration in organizing the emerging Diamond sector in Zimbabwe, so as to assist in the economic turn around of your great nation. I hope and pray that our proposal will be seriously considered and implemented as soon as possible With your assistance and the Support of

Our Great President Mugabe we will not only over come but prosper
. . . Our Proposal and game plan will be forth coming this week.

42. On April 15, 2009, Individual C emailed Turner a proposal, which was addressed to the Zimbabwe Minister of Mines, thanking him for a “productive meeting” on April 9. The proposal suggested that Individual C be involved with two phases: (1) a valuation and marketing of the current stockpile of diamonds; and (2) the formation of a new company between Individual C and the Zimbabwe government to mine, cut, market, and sell diamonds. The proposal suggested that Zimbabwe’s Ministry of Mines accept the offer on April 24, 2009, and that the parties sign a memorandum of understanding on May 4, 2009. The proposal also suggested that the “stakeholders” meet “to plan the way forward.” The proposal stated that the “stakeholders” included the “Ministry, ZMDC, and MMCZ.”⁶ The proposal indicated that it was submitted by Individual C and Turner. Turner forwarded the proposal to Ben Israel on April 15, 2009 and April 21, 2009. In the April 21, 2009 email, Turner added the comment that “We are pushing to close the agreement out in the meantime” and stated that he would “finalize our MOU . . . this week end.” Meanwhile, Individual C continued to email Turner articles on Zimbabwe’s abuses and inability to mine the diamond

⁶ ZMDC (Zimbabwe Mining Develop Corporation) and MMCZ (Minerals Marketing Corporation of Zimbabwe) became Specially Designated Nationals on July 25, 2008.

fields, including an article saying that Mugabe's closest allies were profiting from blood diamonds.⁷

43. On May 5, 2009, Turner emailed Ben Israel attachments containing "information on the Marange Diamond Fields in Zimbabwe. The attachment should give your investors a good look at the . . . productions coming out of the area." Turner stated that Marange, a diamond-rich region, was "under the control of the Zimbabwe Mining Development Corp (government owned)." Turner stated that ZMDC was "ill equipped to mine the 75sq Kl area and lacks the expertise required. Hence EDR ltd [Edenic Diamond Resources] will be entering into an exclusive working agreement to Mine, Market and Process" the diamond mines. The email stated that Edenic Diamond Resources would be owned by the Government of Zimbabwe (25%), Turner and Ben Israel (25%), Individual C and the owner of another company in Johannesburg called Liparm Corporation (50%). It appears from the email that Turner and Ben Israel were seeking investors to purchase a portion of their 25% ownership.

44. On May 6, 2009, Individual C emailed Liparm Corporation and Turner a draft memorandum of understanding between the ZMDC, Individual C, Liparm Corporation's CEO, and Turner. The MOU stated that Edenic Diamond Resources would be the joint venture's name. It said that ZMDC would

⁷ Blood diamonds are diamonds mined and sold to fund violent activity.

provide monthly figures of rough diamond production, ensure legislation is amended to allow Edenic Diamond Resources to participate in the mining, grant Edenic Diamond Resources mining rights, grant the company sole agency over all rough diamond production in the Marange area, and provide security to protect the company's rights, minerals, and assets. On May 6, 2009, Turner forwarded this proposal to Ben Israel's email address, with the note to "Please Pass to Prince ASAP."

45. On May 11, 2009, Individual C emailed Turner an article about an international diamond group calling for a ban on diamond trading in Zimbabwe because the proceeds had been used to fund human rights abuses. In the article, Zimbabwe's deputy minister of mines said that the government would identify appropriate investors to partner with the poorly equipped ZMDC. Turner forwarded the email and attachment to Ben Israel adding, "We are well on our way and need Players on the mining side NOW. This has been done as you know on a Nickel and a Nail I am going over to Zim tonight to try and squeeze out some Cash to keep floating. Find us a serious Mining players who want in on 75 sq Kl of Diamond bearing properties."

46. On May 13, 2009, Individual C emailed another draft proposal to Turner and Liparm Corporation. The proposal called for the government of Zimbabwe and Edenic Diamond Resources to form a partnership for mining and

marketing rough diamonds in the Marange area. The proposal said that Edenic would be granted mining rights for the Marange diamond fields and that it was to “[i]dentify in conjunction with the ZMDC potential mining companies to mine certain other areas of the Marange deposit.” The proposal listed the ownership of Edenic Diamond Resources as: “ABC (us) ___%” and “Zim Gov (ZMDC) __%.” Turner forwarded the email to Ben Israel.

47. On May 17, 2009, Turner emailed Ben Israel with the subject “Investment meeting in New York.” The email attached a letter from Turner on the letterhead of Edenic Diamond Resources written to Ben Israel. The letter stated that their “activities in Southern Africa have increase[d] since the formation of the new unity government in Zimbabwe. We are now ready to offer serious investment opportunities in the areas of Gold, Platinum and Diamond mining.” The letter discussed Turner traveling to the U.S. with the “confidential data” that Ben Israel had “requested.” The letter asked for Turner to be paid a five day “travel and consultancy per diem” of \$15,000 once he arrived in New York.

48. The proposed relationship appears to have broken down a few days later. On May 22, 2009, Individual C emailed a letter to Liparm Corporation with a copy to the Zimbabwe Minister of Mines. The letter was written to the chairman of Liparm Corporation. The letter stated that Individual C had tried

to telephone the chairman about the “unfortunate misinformation” regarding whether Individual C was going behind Liparm’s back to try to work with another company and the Zimbabwe Mining Development Corporation. Individual C said that he had “never entered into negotiations with anyone but yourself I am committed to the process and firmly of the opinion that this will be beneficial to all concerned.” On May 26, 2009, Turner forwarded the email to Ben Israel.

Turner and Ben Israel Continue to Pass Communications Between Zimbabwe Leaders and United States Public Officials while Seeking Payment from Gono

49. On June 21, 2009, Turner sent an email to Ben Israel that attached a letter Gono had written to U.S. Senator A. Turner’s June 21, 2009 email stated that the letter was “[b]ased on the last trip.” In the letter, Gono explained to U.S. Senator A his case for the removal of the sanctions against Zimbabwe. The letter stated that Gono had been “fully briefed about your [U.S. Senator A’s] current efforts on the sanctions issue by the very able” Turner. In the email to Ben Israel, Turner asked for “a similar letter from [State Senator A] on the intent to solicit the support of the National elected officials on the issue of the Sanctions.”

50. Turner continued to try to obtain money for his efforts. On June 29, 2009, Turner sent an email to a family member living in Israel that Turner was

“busy closing in on the Cash.” On July 2, 2009, Turner sent another email to this family member with information on a bank account in South Africa. The email informed Turner’s family member that “we got some small action on Tuesday . . . to take care of the House. I am moving back to Zim next week to try and cut the Big piece loose.”

51. On September 29, 2009, Turner emailed Zimbabwe Official A letters from State Senator A and State Representative A. State Senator A’s letter, dated July 6, 2009, said that State Senator A had made a “commitment” to Mugabe and Gono:

In keeping with my commitment to you and Governor Gono, I am writing to give you an update.

Last month, I joined Prince Asiel in Washington, D.C., where we met with the Prime Minister and his delegation. In our meeting, I informed him that I, too, am a committed member of the team, supported by you, working towards the removal of sanctions placed on Zimbabwe.

State Senator A’s letter also said that in his leadership position with the International Committee for the National Black Caucus of State Legislators, he would “organize a delegation to travel to Zimbabwe . . . to observe the effects of the economic sanctions and assist us in providing the leadership needed to fight for the removal of sanctions.”

52. State Representative A's letter, also dated July 6, 2009, was addressed to Gono and stated:

The fight for removal of sanctions began when we met in your office. You can be assured that I, along with Prince Asiel and his team remain committed to the continuing fight for the removal of the sanctions imposed upon Zimbabwe.

He and I are on the way to Ghana to meet with the President [Obama] and staff to continue this effort.

53. In a July 12, 2009 email, Turner stated that he was "going back over to Zimbabwe with the Lobby deligation to meet with the President [Mugabe] on Thursday." On July 13, 2009, Turner emailed Gono's assistant and said that "The Battle has just begun, Failure is not an option for the Chicago Mob. Please advise our Govonor [Gono] that the team will be coming to Zimbabwe this thursday morning for conference and report on the way forward." Turner said that the "Plan is to spend Thursday and Friday with the Govonor."

54. On August 4, 2009, Individual A forwarded to Turner two letters from U.S. Representative A, who represents a district in Chicago, written on U.S. Representative A's Congressional letterhead and dated July 31, 2009. The letters were addressed to Mugabe and Gono. Each said that U.S. Representative A had been briefed by Ben Israel, who continues to "inform and sensitize African American Leadership on not only the plight of the people of Zimbabwe, but on the economic and political direction of the African Continent." U.S.

Representative A requested a meeting with Mugabe and Gono in Harare in late August or early September.

55. On August 9, 2009, Turner forwarded to Zimbabwe Official A an itinerary for U.S. Representative B, who also represents a district in Chicago, to travel to Africa as part of an official U.S. Congressional delegation from August 15 to 24, 2009. Based on the itinerary, the official U.S. Congressional delegation would take U.S. Representative B to South Africa on August 20 to 23, 2009. Turner said that Ben Israel and Turner would be in Zimbabwe in two days to meet with Zimbabwe Official A and Zimbabwe Official B. On August 19, 2009, Zimbabwe Official A sent an email to Turner apologizing for “miss[ing] your brief last Friday.”

**Turner and Ben Israel Attempt to Have Gono
Speak at an Issues Forum Hosted by U.S. Representative C**

56. On June 15, 2009, Turner received an email from a staffer to U.S. Representative C, who was a special events coordinator for a then U.S. Representative from California. The email stated that the staffer was “glad that we had a chance to speak on Friday.” She indicated that she had read “both documents” Turner had given her and “found the information to be enlightening because as you know what is provided through the media is not an accurate measure of what is happening on the ground.” The staffer stated that they had

discussed another “item” and that she would “be back in touch once I have confirmed with my partner Thank you for willingness to be of support. Looking forward to working with you.”

57. On June 18, 2009, the staffer sent an email to Turner referencing a conversation they had “a few minutes ago.” The staffer stated that her “first response to [Turner’s] document” was that “[y]ou need to know history so you can move to the future... Thank you again!” Turner responded on July 2, 2009, stating that her call “was music to my ear” and that he was awaiting “the invitation for the Governor [Gono] and thank you for your confidence in our team.” A few hours later, the staffer expressed concerns to Turner that Gono’s policies made him too controversial for the event. Turner responded that “[t]he issues in Zimbabwe is not Gono or Mugabe Lets him come and give his side of the Zimbabwe Story at least both sides will be exposed.”

58. On July 3, 2009, Turner received an email from the staffer, which attached an invitation from U.S. Representative C to Gono for Gono to speak regarding the White House’s economic policy on Zimbabwe at an issues forum hosted by U.S. Representative C in Washington, D.C., in September 2009. Turner forwarded this email to Ben Israel.

59. Also on July 3, 2009, the staffer emailed Turner with a budget for a gala event to be held the night before the issues forum. The staffer stated she

had “structured everything and can send you the bank details. So let me know how you wish to proceed.” On July 10, 2009, Turner emailed the staffer and asked her to forward a “contact for the deposit from Better World Foundation. (5k) Can put in place next week.”⁸

60. On July 20, 2009, the staffer emailed Turner and stated that she needed to “confirm the panel so I want to know about the status of Gov. Gono.” Two days later, the staffer emailed Turner again asking, “What is the status of everything..Are you still committed to 25K?” Turner replied, “As promised Tues latest for the beginning of my Pledge. Will call you Mon Just returned from Zim.”

61. Not receiving an answer on whether Gono had committed to attending the event, the staffer sent a follow-up email on July 25, 2009, with the same question. Turner responded, “Yes, the confirmation letter is on the way. He had to seek clearance from the President [Mugabe].” Turner said that he had “a 4hr meeting with the President [Mugabe] Deposit will be wired on Monday Morning.”

62. On July 25, 2009, Turner promised “Tues [July 28, 2009] latest for the beginning of my Pledge.” On July 26, 2009, Turner forwarded to Ben Israel the above-referenced email string with the staffer. The same day, Turner again

⁸ Ben Israel is affiliated with A Better World, which is a not-for-profit entity that has received grants from the State of Illinois.

emailed the staffer to state that he would wire transfer the money the next day and would “hand deliver Balance.”

63. In the email, Turner also asked for the staffer’s home fax number because he did not “want to send your faxes to the office. Have reply from the Governor [Gono].” The staffer responded that she did not have a fax number at home. Turner said that he could fax the letter to her office, but that he wanted to make sure that she was there when he did so. He said that the letter was “from the Govonor [Gono] confirming his williness and desire to participate in the forum to set the record straight. Needless to say Bush was wrong on many issues and Zimbabwe was definitely one of them.”

64. It appears that Turner provided the funds to sponsor the event three days later. Bank records show that on July 29, 2009, Turner wire transferred \$4,975 from a bank account held in his name in South Africa to a bank account registered to an organization affiliated with the issues forum in Washington, D.C. On July 30, 2009, the staffer informed Turner that “[t]he sunshine [the money] came yesterday and was most appreciated.” She then asked Turner, “how do you wish to be recognized [for the donation] or is this anonymous?” The staffer stated that she was “told that the sunshine is due back next week.” Turner replied that “Reconignition is not what Prince and I are about.” On August 5, 2009, the staffer asked “Under what name do I list your contribution?”

Turner responded, that contribution should be attributed to “Better World Inc.” and should list Ben Israel as chairman. When the staffer asked which event the organization was contributing to, Turner responded that it was “concentrating on the Issues forum.”

65. In order to ensure Gono could speak at U.S. Representative C’s issues forum, Turner attempted to assist Gono obtain a visa. On July 30, 2009, Turner informed the staffer that the plan was to notify “the State Department of the request for Dr. Gono to travel to the . . . event with the support of [U.S. Representative A] and others.” Turner asked for an update on the forum and for a response to Gono’s acceptance of the invitation.

66. On August 4, 2009, Turner sent a follow-up email to the staffer. Turner said that they were ready to “submit the letters to the State Department and provide the Embassy in Harare with the necessary Documentation with the 9 guest of Gov. Gono.” Turner again asked for a response to Gono’s acceptance of the invitation. Turner said that he wanted it done as soon as possible because he was leaving for Harare the next day. Turner said that he would meet the staffer on August 15, 2009, to “close out formalities on the Dinner and update you on the Presidents [Mugabe’s] visit to NY for the UN.” The staffer responded that they were “looking forward to having the Gov. Gono participate in our issue forum.” Turner forwarded this to Ben Israel with the comment, “here we go.”

67. On August 19, 2009, Zimbabwe Official A emailed Turner a document called “Rebirth of an African Genius: The Sources of the Zimbabwe Tradition.” The document, which listed Zimbabwe Official A as the author, called Mugabe “an uncanny intellectual, austere revolutionary and visionary statesman.” It stated that the sanctions were a “vindictive policy of regime change” based on “neo-imperial pretensions.” Turner forwarded this document to the staffer, asking her to “please read and distribute to the enlighten or those pretending to want info. (*smile). See you on Tuesday.”

68. Turner also arranged for Zimbabwe Official A and Zimbabwe Official B to travel to the United States and to U.S. Representative C’s issues forum in September 2009. On August 19, 2009, Zimbabwe Official A sent an email to Turner asking about his trip to New York, Washington, and Chicago. Turner said he would try to have the staffer send an invitation via facsimile if Zimbabwe Official A felt it was necessary. Turner asked Zimbabwe Official A to “call Prince [Ben Israel] ASAP.”

69. On August 21, 2009, Turner emailed Individual A and said that “we need to send the Visa request to Harare for [Zimbabwe Official A and Zimbabwe Official B] to attend” U.S. Representative C’s gala event before the issues forum as soon as possible. The email stated that “Both are holders of Diplomatic Pass Ports and not on Travel Bans.” The email stated that Turner would “draft letters

on Sunday on Better World Lter Hd.” The same day, Turner informed Zimbabwe Official A that the visa letter for Zimbabwe Official A and B would “go out to the Embassy” that Monday.

70. Turner sent a similar email to Zimbabwe Official A on August 22, 2009. In it, he said that Zimbabwe Official A and B might have to present at the issues forum because Gono was “still freezing up on the issue.” On August 25, 2009, Turner sent another email to Zimbabwe Official A, stating that the official would be a “featured speaker” and that Zimbabwe Official B would be involved in a women’s forum. Turner said that this would be “our chance to set the record straight,” but that they would need the “blessings and support of . . . the Boss [Mugabe] if GG [Gono] is standing down.” Also on August 25, 2009, the staffer emailed Turner an official invitation from U.S. Representative C to Zimbabwe Official A and B. The invitation stated that Zimbabwe Official A would be participating in the issues forum to “address the ‘segment, ***Zimbabwe: An Economy in Need of Transition?**’” (emphasis in original). Turner forwarded the invitation to Zimbabwe Official A and Ben Israel. Turner’s email to Zimbabwe Official A stated, “Lets get it on. See you Friday in Harare..”

71. On August 29, 2009, the staffer sent Turner information, via email, on sponsorship of tables at the gala event. In it, the staffer said that she needed “the check and of course find out about receiving funds from foreign entities.”

Turner forwarded this email to Zimbabwe Official A, stating “just so you are clear my brother there is no free lunch (smile) Prince and I have 1 table and seats for you and [Zimbabwe Official B].” Turner instructed Zimbabwe Official A to use the invitation from the staffer to “get the visas ASAP.”

72. On September 2, 2009, the staffer informed Turner that she had called Gono’s assistant, who had asked for an email from the staffer. Turner provided the staffer with Gono’s assistant’s email address. The next day, Turner informed the staffer that Gono was “claiming the President [Mugabe] put things on hold but we doubt this. [Zimbabwe Official A] wants to pass on to foreign affairs.” Turner then provided the staffer with a fax number for Gono to request confirmation from Gono on whether he would participate in the forum.

73. At the same time, Turner continued to seek payment from the Reserve Bank of Zimbabwe. On September 2, 2009, Turner emailed someone to whom he owed money and said that he was “catching hell collecting from the RZB [Reserve Bank of Zimbabwe] . . . Been to Harare 6 times and to the US trying to keep floating.”

74. On September 4, 2009, Turner emailed Zimbabwe Official A and noted that Turner was “NOT DISMAYED AT YOUR FRUSTRATION BUT I KNOW YOU DON’T THINK FOR ONE SECOND THAT PRINCE AND I ARE IN AFRICA FOR THE MONEY.” The email stated that “THE REALITY OF

DOING BUSINESS IN AMERICA IS POLITICIANS NEED SUPPORT . WE SOLIDER ON.”

75. On September 5, 2009, Turner received an email informing him that visiting U.S. Congressmen met with the Prime Minister of Zimbabwe, but only asked to see Mugabe on their way out of town. Turner responded that this happened because Gono “dropped the ball. The British don’t have a problem spending the money.” On September 7, 2009, Turner forwarded this email to the staffer.

76. Meanwhile, Turner continued his efforts to have Gono and Zimbabwe Official A and B attend the issues forum. On September 8, 2009, Turner sent the staffer “talking points” for a conversation the staffer was going to have with Gono. Turner stated that one of the talking points was that the staffer “simply want[ed] clarity on the proposed presentation on the effects of the sanctions for the issues forum.” The email indicated that the money Turner had donated to the forum actually came from Gono because Turner said that the staffer should “[t]hank him for support of Better World and the Gala for [U.S. Representative C].” Turner asked the staffer to “stress the hard work done by his team on the Hill. Make it clear that absence of the ZANUE PF [ZANU-PF] representation [at the issues forum] the MDC [ZANU-PF’s political rival] is

going to push their position.” Turner directed the staffer to have Gono “pass his final decision” about attending the issues forum onto Turner.

Ben Israel Arranges for U.S. Public Officials to Meet with Mugabe in New York and Plans Another Delegation to Zimbabwe

77. On September 17, 2009, Turner sent Zimbabwe Official A an email stating that Ben Israel had confirmed his audience with Mugabe. Turner said that it would be good if Zimbabwe Official A could make it as well “because we will brief him on the True History of the US Lobby effort including the key roll you and [Zimbabwe Official B] Played.” Turner said that they would be bringing “a deligation of brothers and sister sitting in Congress . . . to give their support to lifting of the Sanctions.”

78. On September 21, 2009, Turner provided Zimbabwe Official A with details of Ben Israel’s meeting with Mugabe in New York. Turner stated that “The Boss [Mugabe] was in tears with the Big and strong deligation. Prince had the Leaders of Congress in the room for 2 hours with President Mugabe.” Turner said that “The brothers pledged to assist in the removal of both the sanctions and the Law in 2010.” Turner stated that Mugabe “invited us back to Harare next week to lay out the plan with the Foreign Minister.” Turner said that “We informed them you were coming for the . . . issues forum and your over all support for the Lobby from the inception.” Turner stated that Ben Israel “had to

lay out the financial realities of making things work in DC” and that Mugabe “seemed to fully understand because we moved 6 people over to NY and [State Representative A] from Chicago in a 1 day notice.” Turner said that they had been “instructed to work thru the foreign Minister,” rather than Gono.

**Turner Travels to Zimbabwe to Seek Payment,
Develop a Plan, and Update Zimbabwean Leaders on Progress**

79. Zimbabwe Official A informed Turner in an email the next day, September 22, 2009, that he and Zimbabwe Official B did not yet have their visas to attend the issues forum. Turner expressed frustration and claimed it was part of a conspiracy to keep President Obama in the dark about Zimbabwe. Turner stated that “Prince and I will return to Zimbabwe to confer with the Foreign Minister and the Joint Parliamentary committee to develop a Master Plan for the removal of Sanction What ever price we have to pay even if it means Breaking Bushes Law, Let it be.”

80. On October 2, 2009, Turner asked Individual D, his assistant in Zimbabwe, for the name and email address of the Foreign Minister. Turner said that he needed to “notify[] them of the planning deligation coming in to Harare Thursday Morning” as “a follow up of the meetings held with President [Mugabe] in NY.” Individual D responded that the Foreign Minister was “Simbarashe S. Mumbengegwi,” provided the email address of someone in Mumbengegwi’s office,

and stated “NO PRESS.” On October 4, 2009, Ben Israel wrote a letter to Mumbengegwi, thanking Mumbengegwi and Mugabe for a “most productive meeting in New York.” Ben Israel said that he had met with three U.S. Congressmen, including one who “shared with me his sincere desire to be a part of the team to work toward the lifting of the sanctions imposed on Zimbabwe.” Ben Israel said that he, Turner, and Individual E would travel to Harare on October 8, 2009, and were requesting meetings with Mumbengegwi, Tsvangirai, and Mugabe. Ben Israel asked for Mumbengegwi to arrange for airport pick-up and hotel accommodations. Individual A sent this letter to Turner, stating that it had been emailed to Mumbengegwi’s assistant. On October 4, 2009, Turner forwarded the letter to Individual D, asking him to “KEEP THIS LETTER CONFIDENTIAL UNLESS I INSTRUCT YOU OTHERWISE.”

81. On October 6, 2009, Individual D sent an email stating that Turner would be meeting with Gono on October 8 at 11:00 a.m. Turner sent an email stating that he would be “return[ing] to Zimbabwe on thursday for the most important trip of the year. THE PAY DAY.”

82. It appears that the trip was postponed for about ten days. On October 12, 2009, Turner emailed Individual D, instructing him to “minimize paper work falling into the wrong hands..Go slow dont mess up with your mouth please.” The next day, Turner told Individual D that “Prince is counting on you

next week , , He arrives on Monday afternoon We are close to getting out of the hole. Listen and talk little.”

83. On October 17, 2009, Turner emailed Zimbabwe Official A a letter from U.S. Representative A to Mugabe stating:

Please allow me to thank you, once again, for the most positive and productive meeting in New York As I prepare to visit Zimbabwe, in December 2009, to follow up from our meeting, I would like to make firm my travel arrangements. I am available December 6, 2009 through December 10, 2009. If these dates are amenable to you and your schedule, please send to me . . . an official invitation. You may send the e-mail to [an assistant to U.S. Representative A] and [Ben Israel’s email address]. Know that I am fully committed to working toward the removal of the sanctions placed upon Zimbabwe and am looking forward to meeting with you

84. On October 29, 2009, Turner sent an email to the staffer, informing her that they were “now dealing with revitalizing the Lobby agreement” and said that they would “not forget our Solider Sister. Things should be completed this week.” A week later, on November 4, 2009, Turner informed the staffer via email that they were returning “to Zim today to see Gov [Gono] . . . Hope to have news for you and US. (smile) God only knows. The Politics is Mad and confusing.”

85. On November 4, 2009, Turner emailed an associate to say that there was a hang-up with the money:

The Funds to pay for the lobby was tied into the World Bank Payment which is thre but the Ministry of Finance and the RZB [Reserve Bank of Zimbabwe] is fighting for control. Our is with The

Government.. This issue is literally killing me in more ways than one. I am going back over to fight one more time this morning and see if the Govonor wont personally do something as promised.

86. On November 8, 2009, Turner emailed Individual A and said that “I know its taxing now with the Cash crunch but Prince needs you more than ever and so do I I am due to deliver a important letter regarding the [State Senator A] deligation.” Turner asked for the names and bios of the officials who would be traveling with State Senator A to Zimbabwe in December. Turner said that Ben Israel was “supposed to get a letter” from the Zimbabwe Ambassador to the United States “to President [Mugabe] ASAP concerning the role of the deligation to support the dropping of the Sanctions, please follow up on these items Post Haste.”

87. On November 9, 2009, Turner sent an email to Individual A at Ben Israel’s email address asking for details on the delegation for Turner to “take to the Chief Sec of the Presidents [Mugabe’s] cabinet.”

88. On November 14, 2009, Turner emailed to Ben Israel a letter written the previous day by Mugabe’s Chief Secretary to Ben Israel regarding “Visit of the [State Senator A] and U S Delegation to the Republic of Zimbabwe: 6 to 10 December 2009.” In the letter, the Chief Secretary informed Ben Israel that “the date proposed for the above visit on 6 to 10 December was accepted by His Excellency the President R G Mugabe.” The Chief Secretary stated that Mugabe

“highly appreciates that you and your colleagues are working tirelessly at both Federal and State levels in the United States of America in support of the Inclusive Government and the removal of the illegal sanctions imposed to Zimbabwe by the United States and its allies.” The Chief Secretary said that Mugabe “look[ed] forward for the visit and hopes that the exchange of views will contribute to the early removal of U S imposed sanctions.” In forwarding this letter, Turner congratulated Ben Israel and asked Ben Israel for more details on the trip. Turner said that he would meet with S.K. Moyo regarding the travel arrangements and program in Harare.

**Zimbabwe Deputy Prime Minister Travels
to Illinois to Meet with Public Officials**

89. In mid-November 2009, Zimbabwe Deputy Prime Minister Thokazani Khupe traveled to Illinois to meet with State of Illinois and City of Chicago officials in a trip that a press release (issued by International Resort Holdings) said was arranged by Ben Israel and others. The pictures from the press release included Khupe posing with Ben Israel and several current and former elected officials. Turner forwarded this press release to several people, including Zimbabwe Official A and Individual D. Turner instructed Individual D to “Print and Pass on to Gono from Me Please We are going to keep him in the loop no matter how much pressure. we remain his external Team.”

90. Turner and Ben Israel tried to use the Khupe press release as a way to build support for them to arrange for Zimbabwe's Minister of Tourism, Walter Mzembi, to travel to the United States to meet with officials close to Turner and Ben Israel. On November 15, 2009, Turner forwarded to Mzembi the press release on Khupe's Illinois visit and stated, "As you can see the Prince is on the case. We are now planning a serious trip for you and your team in 2010. Please share this report with his excellency [Mugabe]."

91. On November 15, 2009, Turner also forwarded the press release to Mugabe's Chief Secretary and stated that they were "planning a follow up trip for Minister Mizimbi very soon which will have Finicial substance and gain support for the lifting of Sanctions." Turner stated that he still needed "Logistical assistance with the [December] Deligation. Need you assistance." Turner said that "Details on the Deligation will be forwarded shortly including background of the legislators coming." Turner sent the press release to a family member in Israel and told her Khupe's visit was "Part of the Lobby contract to promote Tourism in Zim. You see why the Prince is important. Send the Bank info ASAP."

92. Meanwhile, it appears that Turner continued to solicit funds from Gono. On November 15, 2009, Turner emailed a Zimbabwean official that he was "off to US Wed to prepair the deligation for the visit. So far so good. Still no

logistical help from our Banker. Please check on his lack of communications. We dont want to let the Boss [Mugabe] down or talk to him about the brothers behaviour.”

Ben Israel and Turner’s Lobbying Efforts with a Caucus of State Legislators

93. Turner and Ben Israel lobbied a caucus of state legislators (“the Caucus”) to advocate for the removal of sanctions against Zimbabwe in three ways. First, Ben Israel spoke about the sanctions at the Caucus’s convention in December 2009. Second, they sought for the Caucus to pass a resolution asking for the removal of sanctions against Zimbabwe. Third, they made plans to bring Caucus members to Zimbabwe as part of the December 2009 “delegation” before that trip was cancelled.

94. On October 27, 2009, an assistant with the Caucus sent Ben Israel and State Senator A an email, which invited Ben Israel to speak at the Caucus’s panel discussion in Florida on December 3, 2009, regarding “Opening the Doors of Opportunity to our Neighbors: Business Options and Economic Development with Cuba, Haiti and Zimbabwe.” On December 11, 2009, Ben Israel received a thank you letter from the Caucus for speaking as the “featured panelist” during the conference. The letter was addressed to “Prince Asiel, Representative, The

Republic of Zimbabwe” and said that Ben Israel offered “considerable insight on the possibilities of benefits of U.S. relations with the Republic.”

95. On November 3, 2009, State Senator A wrote a letter in his capacity as a high ranking member of the Caucus’s International Affairs committee “to urge the Executive Committee . . . to encourage all of its members to call on their respective legislation to engage in the pro-active actions to partner with nations like Zimbabwe and Haiti.” State Senator A asked the Caucus to “demand that the Obama administration remove the sanctions that have placed a strangle hold on the economy of Zimbabwe The sanctions are in place because the Zimbabwe government dare [sic] to stand up against European colonizers who have monopolize [sic] the ownership of the land and other natural resource at the expense of the indigenous people of Zimbabwe.”

96. On November 16, 2009, Turner forwarded to Zimbabwe Official A an email from Individual A that contained the biographies of those Caucus members scheduled to attend the delegation. Turner instructed Zimbabwe Official A to pass the information onto his wife “to review and prepair to Host.” Turner said he needed Zimbabwe Official A’s and B’s “assistance badly” because “Our man [Gono] has fell of the radair screen.” Turner explained that the people attending were State Senator A’s “support group coming to look into things and confer with The President and Prime Minister. We want you to give them a

welcome briefing and [Zimbabwe Official B] to organize some Lawmakers to meet with them.”

97. Turner sent the same biographies to Mugabe’s Chief Secretary on November 16, 2009, informing him, “As per your direction we have advised Amb Moyo of the up coming support group coming to visit and confer with H.E. President RGM. As explained at your office these legislators are chosen by [State Senator A] and briefed on the real issues.” Turner said that they must “encourage [the delegation] to push for the REMOVAL OF THE BUSH SANCTIONS.” Turner also stated that Zimbabwe’s Ambassador to the United States, Machivenyika Mapuranga, would be attending the Caucus’s convention in December. Turner stated that Ben Israel would be meeting with Ambassador Mapuranga about “Budgets required and final program.” Turner complained that they had received “no response from Governor Gono who was designated by His Excellency to coordinate the support groups, please advise the way forward.”

98. On November 16, 2009, Turner also forwarded the biographies of the Caucus members to Foreign Minister Mumbegwi and explained the plans for the delegation. Turner said that State Senator A “is in strong support of removal of the Sanctions and expressed it to the Obama Administration.” Turner stated that the state officials would spend the night of December 5, 2009, with Moyo in Johannesburg before proceeding to Zimbabwe.

99. On November 17, 2009, Zimbabwe Official A expressed concern about the cost of the delegation in an email he sent to Turner and copied to Zimbabwe Official B. He stated that the “financial implications” were “beyond our means.” Zimbabwe Official A said that the “initiative needs institutional backing” and that “[Zimbabwe Official B] works under parliament. so the speaker and clerk of parliament have to be part of it. also needs political patronage from both parties [ZANU-PF and MDC].”

100. On November 24, 2009, Turner sent Mugabe’s Chief Secretary an email informing Mugabe’s Chief Secretary that Turner would “COME TO HARARE FOR FINAL BRIEFING WITH YOU THURSDAY.” The email attached a letter from State Senator A to Mugabe. The letter stated:

In an effort to make sure that you are updated on the work being done towards the lifting of the sanctions imposed upon Zimbabwe, I wanted to personally give confirmation that we are in the final planning stage as we prepare for the delegation to travel to South Africa and Zimbabwe.

. . . .the delegation, led by me and coordinated by Prince Asiel Ben Israel, is scheduled to travel December 6, 2009 to December 10, 2009....I am looking forward to meeting with you again, as we work together to bring an end [to] the sanctions and further growth and development in Zimbabwe.

101. Turner also sent Mugabe’s Chief Secretary a letter State Senator A had addressed to Gono, which informed Gono that Ben Israel “continues to sensitize African American Leadership” about Zimbabwe. State Senator A stated

that Ben Israel and Ambassador Mapuranga had been invited to the Caucus meeting “to give an update regarding the effects of the sanctions that have been unjustly imposed upon the people of Zimbabwe.” State Senator A said that while in Zimbabwe, he “hope[d] to meet with you to further discuss” the impact of the sanctions and to “develop a strategy that will end with the lifting of the sanctions.”

102. On November 24, 2009, Turner forwarded to Mugabe’s Chief Secretary and Moyo a thank you letter Individual E received from Khupe regarding her visit to Chicago. In his email to the Chief Secretary, Turner wrote that “your team is in total control in the US. Look forward to breifing you on Thursday.” Turner similarly informed Moyo that “YOUR TEAM IS IN CHARGE IN ALL MATTERS CONCERNING ZIMBABWE IN THE US.”

103. On November 27, 2009, Individual A emailed to a travel agent in South Africa the list of the “delegates traveling as part of” the Caucus “Per Mr. Turner and Prince Asiel.” The same day, Turner emailed a family member, stating that he was “battling for budget for my deligation now.”

104. On November 30, 2009, Turner emailed several Zimbabwe officials, including Zimbabwe Official A, Mugabe’s Chief Secretary, Mapuranga, and Moyo a confirmation of the schedule. Turner also informed the travel agent in South

Africa that Turner had “to take the flight scheduel over to the Presidents office for final approvals.”

105. On December 3, 2009, Turner sent an email to Individual A at Ben Israel’s address saying that “THE COMPLETE ON THE GROUND PROGRAM IS BEING COMPLETED TOMORROW BY [Gono’s assistant] AT THE RESERVE BANK OF ZIMBABWE. REMEMBER THEY ARE GUEST OF BETTER WORLD NOT THE GOV OF ZIMBABWE. PLEASE MAKE HAT CLEAR.” Later that day, Turner sent a similar email to Individual A at Ben Israel’s email address asking her to “request the copy of the Harare program from the Govonors [Gono’s] office including Hotel confirmation.” Turner also asked for her to “send me any material you have put together on Better World because the Zim Press is coming after us for sure. Its got to be tight as Better World is sponsoring the trip with [State Senator A’s] people.”

106. On December 4, 2009, Turner forwarded an agenda to Individual A and stated that it was “a first draft from the RZB [Reserve Bank of Zimbabwe] the last 2 days are open for the Presidents [Mugabe’s] office.” The agenda was on Reserve Bank of Zimbabwe letterhead and it was titled, “Programme On Tour of Examples of the Impact of Sanctions.” The agenda included a meeting with Gono and a “Possible courtesy call on VVIP [Mugabe].” Turner asked Individual A for biographies on Ben Israel and State Senator A. Turner said they would

“need the AMMO. please do some finicial research on the states they [the Caucus members] are coming from. so the gov [Gono] can see the linkages possible.”

107. On December 4, 2009, Turner sent another email to Individual A stating that he understood “a resolution was submitted at the [Caucus’s] conference” and asked for a copy “ASAP would like to use it as leverage. At this point its hand to hand combat.”

The Delegation is Cancelled

108. The Zimbabwe government cancelled the Caucus’s delegation on December 4, 2009. Turner emailed the South African travel agent stating that “We trully felt we were doing the legal and proper thing in helping Dr. Gono and Zimbabwe in their effort to lift the Sanctions. All of our actions we the direct instructions of RZB [Reserve Bank of Zimbabwe] as it related to travel. No personal travel was involved, we simply wanted to carry out our mandate.”

109. On December 4, 2009, one of Turner’s family members emailed Turner to ask if he was “OK.” Turner responded, “Not really but it goes with the terrain (smile).” Turner said that he had a \$150,000 “mess up with Zimbabwe, trying to do some damage control.”

110. On December 5, 2009, Turner emailed an associate who was supposed to assist him with the delegation and explained that the trip was canceled because “The Reserve Bank did not approve payment for the deligation.

The Governor no longer believes the US Black political establishment can help Zimbabwe's situation I saw it coming with the travel agency when you and [Individual A] were added to the list, it prompted a call to inquire if the additional people were Senators and drove the bill over the 1M rand cap."

111. In a later email that day, Turner held out hope that they "still got a shot because the [Caucus] passed the resolution on Sanctions last night and I think the fire could still be lit under the Old man [Mugabe] to make the money flow. So stay ready, we got to make it work." Turner said that he might "go over with the resolution. Make sure Nasi [Ben Israel] and [State Senator A] get the Zimbabwe portion engraved colorful and framed to bring over to be presented to the Old man [Mugabe] ASAP..Its a shot."

112. On December 5, 2009, Turner sent an email to Mugabe's Chief Secretary. The subject line of Turner's email stated that the email was a "Christmas Gift for the President and People of Zimbabwe." Although it appears that Turner meant to forward documents to Mugabe's Chief Secretary, it appears that he forgot to attach the documents. The body of the email stated:

Please read the attached Resolution which was Historically Passed by [the Caucus] this week end in Florida, and then to be let down the next morning by not being able to deliver the Original Proclamation to His Excellency in person. It is not too late to pull part of the executive Board together and come this week to make an official presentation in Harare. This is a major accomplishment for the Black world to show solidarity with the President [Mugabe] and

people of Great Zimbabwe. Please pass on to his excellency [Mugabe] and let him know we stand ready to come and stand by his side (Now) I await your call as this document will be released to the International press at the recommended time.

113. Turner also emailed Individual D on December 5, 2009, and attached State Senator A's request for a Caucus resolution and several Caucus resolutions from 2003 to 2006 regarding African issues. Turner directed Individual D to deliver the documents to "our cheap ass Gov so he know Failure is not an option with the Chicago Mob. We will be coming to deliver the Original Resolution to H.E. [Mugabe] whos office already has scanned copy."

114. In a December 6, 2009 email, Turner stated that he was "busy doing damage control . . . Its been a major embarrassment to Prince and the Senator [State Senator A]." Turner said that the resolution and the Caucus were to be used as "a pressure base on the Obama Adminaastration not to sign the Bush Act (ZEDERA) in March of 2010." Turner explained that "Gono really let his personal ambitions over ride the good of his Nation." Turner said that he was scheduled to speak with Mugabe's Chief Secretary the next day and was still hoping to find a way to bring State Senator A and Ben Israel to "make the presentation [of the resolution] to the President." Despite these efforts, it does not appear that Turner and Ben Israel were able to bring members of the Caucus to visit Zimbabwe as part of a delegation to discuss sanctions.

115. On March 1, 2010, President Obama announced that he was continuing the Zimbabwe sanctions for a year. On July 29, 2010, U.S. Representative A, U.S. Representative B, and U.S. Representative C co-sponsored a bill (HR 5971), which sought, among other things, a “[r]eview of targeted sanctions in support of peace and democracy in Zimbabwe.” In March

2011, 2012, and 2013, President Obama again continued the Zimbabwe sanctions for a year.

116. Based on the foregoing, I believe there is probable cause showing that Ben Israel and Turner have violated Title 50, United States Code, Section 1705, by willfully conspiring to provide consulting, public relations, and lobbying services on behalf of and for the benefit of Specially Designated Nationals Robert Mugabe and Gideon Gono without first having obtained a license from the U.S. Department of the Treasury, in violation of 31 CFR §§ 541.201, 541.204, and 541.405.

FURTHER AFFIANT SAYETH NOT.

STEVEN D. NOLDIN
Special Agent, Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on July 16, 2013.

YOUNG B. KIM
United States Magistrate Judge