

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Aaron P. Steketee, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so since 2010. I am currently assigned to the FBI’s Counterintelligence Division, Detroit Field Office. I am responsible for counterintelligence and counterproliferation investigations for the FBI, including malign foreign influence investigations involving foreign governments and their agents. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7).

2. I make this affidavit in support of a criminal complaint charging defendant **Natalia Burlinova** (a/k/a Natalya Burlinova) with conspiring to violate Title 18, United States Code, Section 951 (Agents of Foreign Governments), in violation of Title 18, United States Code, Section 371 (Conspiracy to Commit Offense or to Defraud the United States), and with acting as an agent of a foreign government without prior notification to the Attorney General, in violation of Title 18, United States Code, Section 951.

3. The facts set forth in the affidavit come from my personal involvement with the investigation, interviews with witnesses, review of documents, and other information known to me as a result of my involvement in the investigation. In submitting this affidavit, I have not included each and every fact known to me about this investigation. Rather, I have included only those facts that I believe are sufficient to establish probable that the defendant committed the charged offense.

LEGAL BACKGROUND

4. Title 18 of the United States Code, Section 371 (Conspiracy to Commit Offense or to Defraud United States), makes it a criminal offense for two or more persons to knowingly and

intentionally conspire either to commit an offense against the United States or to defraud the United States, or any agency thereof, in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy.

5. Title 18 of the United States Code, Section 951 (Agents of Foreign Governments), makes it a criminal offense for any person, other than a diplomatic or consular official or attaché, to knowingly act in the United States as an agent of a foreign government without providing prior notification to the Attorney General, as required by law. For purposes of this law, the term “agent of a foreign government” includes an individual who agrees to operate within the United States subject to the direction or control of a foreign government or official. The Office of the Attorney General is located in Washington, D.C.

INDIVIDUALS AND ORGANIZATIONS

6. Burlinova is a 39-year-old citizen of the Russian Federation (“Russia”). Her employment history includes work for a Russian state-owned domestic news agency and a Russian research institute founded by a former President of Russia.

7. “Public Initiative ‘Creative Diplomacy’” (“PICREADI”) was a Russian organization founded by Burlinova in 2010. PICREADI publicly presented itself as “one of the leading Russian organizations on public diplomacy,” and as “[d]evoted to the Russian national interests and to the idea that [the] Russian voice should be heard.” PICREADI publicly described itself as a “non-governmental organization” that was funded by grants from the Russian government, including from the Presidential Grant Foundation and the Russian National Charity Fund. PICREADI also publicly described itself as operating an independent academic research center.

8. “Meeting Russia” was a “public diplomacy program” operated by PICREADI from at least 2017 through 2021. Meeting Russia was a three-day program held in Moscow each year

during which young leaders from the United States and Europe met with senior Russian government officials and other Russian leaders. United States citizens participated in the Meeting Russia programs in Moscow from at least 2017 through 2021 in person and, in some instances, by video conference. PICREADI paid for the lodging and accommodations of Meeting Russia participants, and in some cases reimbursed participants for all or a portion of their travel costs.

9. “Public diplomacy” is a term of art that I understand refers to the means by which a sovereign country communicates with the public in other countries in order to inform and influence foreign audiences for the purpose of promoting the foreign country’s national interests and advancing its foreign policy goals.

10. The Federal Security Service (“FSB”) Officer is a citizen of Russia who resided in Moscow, Russia and was employed by the FSB. The FSB was Russia’s internal security and counterintelligence service, headquartered on Lubyanka Square in Moscow, Russia. The FSB implemented Russia’s national security policies, including in the areas of counterintelligence, counterterrorism, and internal security. The FSB Officer’s electronic communications reveal that: (a) the FSB Officer resided in a Moscow apartment building owned by the FSB; (b) the FSB Officer possessed photographs taken at FSB offices in Russia; (c) the FSB Officer possessed FSB documents stamped with FSB markings; and (d) Burlinova and others shared information with the FSB Officer for the purpose of the FSB Officer including that information in FSB intelligence reports.

PROBABLE CAUSE

11. Without ever notifying the Attorney General of her activities as required by law, Burlinova conspired with the FSB Officer in a years-long effort to influence the opinions of future leaders in the United States on behalf of the Russian government. Burlinova recruited U.S. citizens from academic and research institutions to travel to Russia for PICREADI’s Meeting Russia

program, which was devoted to Russian national interests and funded in part by the FSB, a fact never disclosed to the public. Burlinova provided extensive information to the FSB about the U.S. citizen participants in the Meeting Russia programs, including biographical information, their interests, and their political opinions. The FSB subsequently monitored the career developments of these U.S. citizen participants with an aim that some would become influential public figures.

12. As early as February 2015, Burlinova shared with the FSB Officer her desire to attend conferences in the United States in order to advocate for Russian interests.¹ On February 18, 2015, the FSB Officer informed Burlinova that from his position he could help send her to the United States. The FSB Officer specified that Burlinova would need to propose a list of American experts and specialists with whom Burlinova intended to meet during her travel. The FSB Officer also instructed Burlinova that her proposal for travel to the United States should specify that the purpose of the travel would be for Burlinova to establish and develop relationships with American experts, policymakers, journalists, and activists. The FSB Officer told Burlinova that it would be easy to get funding for her travel if she were to plan to contact American experts with specific ties to information platforms.

13. On March 7, 2015, the FSB Officer provided Burlinova with a list of individuals associated with U.S. universities and foreign policy institutes. The FSB Officer instructed Burlinova to study the publications and activities of the people on his list, so that he and Burlinova could discuss the possibility of Burlinova reaching out to them.

14. On April 3, 2015, the FSB Officer referred Burlinova to prominent scholars at U.S. universities, noting that they were influential and well-known and could recommend students to study in Russia.

¹ Most of the communications described herein were written in Russian, and I have summarized aspects of those communications based upon summary translations subject to further review by linguists.

15. On May 13, 2015, the FSB Officer provided Burlinova with a long list of assignments, including for Burlinova to provide the FSB Officer with information about her contacts and meetings and her efforts to organize conferences and trips to Moscow by American leaders.

16. In December 2016, Burlinova and the FSB Officer exchanged e-mail messages discussing the participants in the upcoming 2017 Meeting Russia program in Moscow, which was scheduled for February 2017. The discussions included information about U.S. citizens who would participate in the program. The FSB Officer informed Burlinova that he would need copies of the participants' passports for verification.

17. On January 8, 2017, Burlinova asked the FSB Officer for assistance obtaining visas for the participants in the upcoming 2017 Meeting Russia program. Also in January 2017, Burlinova and the FSB Officer evaluated the resumes of potential participants in the upcoming 2017 Meeting Russia program to identify interesting candidates.

18. The 2017 Meeting Russia program was held in Moscow from February 16-18, 2017. U.S. citizens traveled to Russia to participate in the program. During the program, the participants visited the Russian Ministry of Defense, Ministry of State, and Ministry of Foreign Affairs. One participant was asked and agreed to participate in an interview for a Russian news station regarding her participation in the Meeting Russia program. One speaker at the event was a former accused Russian intelligence agent who had operated in the United States until 2010, when the speaker was arrested in the United States and later released as part of a prisoner exchange between the United States and Russia.

19. On February 16, 2017, Burlinova provided the FSB Officer with a summary of her initial impressions and observations of the U.S. participants and their views towards Russia.

Burlinova stated to the FSB Officer that she would provide a full report after the Meeting Russia program ended.

20. On November 9, 2017, Burlinova provided information to the FSB Officer about U.S. citizen participants in the 2017 Meeting Russia program who, in Burlinova's view, had positive attitudes towards Russia and were prepared to continue to collaborate.

21. In February 2018, Burlinova provided information to the FSB Officer about the upcoming 2018 Meeting Russia program, scheduled for the following month, including information about the budget for the program and the expected participants, including their passport information. The FSB Officer claimed to have utilized the participant passport information to facilitate the granting of visas to Meeting Russia participants.

22. The 2018 Meeting Russia program was held from March 16-18, 2018, in Moscow. U.S. citizens traveled to Russia to participate in the program, during which presenters asked some U.S. citizens to encourage others to attend future Meeting Russian events. Some participants later described the program as pushing a pro-Russian agenda and as being in part designed to identify U.S. participants who might later serve in the U.S. government.

23. On October 5, 2018, Burlinova informed the FSB Officer about two prior participants in another Russian public diplomacy program in which Burlinova had been involved. Burlinova reported that the two prior participants, both of whom resided in a European country, were running for public office. Burlinova stated that these were the results that take years to come into fruition. The FSB Officer responded that this was truly the result for which they were striving and requested that Burlinova provide more information about these prior participants and the election for public office so that the FSB Officer could prepare a report. The two candidates ran for parliamentary positions; one won in that election, and the other was elected subsequently to parliament.

24. On October 6, 2018, Burlinova transmitted to the FSB Officer an academic paper studying the role of Russian intelligence services and Russian institutions of soft power in the design and implementation of the present-day strategies of knowledge weaponization and ideological subversion. The paper characterized PICREADI as a Russian ideological subversion agency with characteristics of a government-sponsored non-governmental organization. Burlinova then commented to the FSB Officer that some in Washington viewed PICREADI as just a handshake away from Russian President Vladimir Putin.

25. Between October 15 and 26, 2018, the FSB Officer told Burlinova that he needed to meet with her, that he had decided on the plans, that he was evaluating her funding, and that he needed materials from her that were necessary to include in his reports.

26. On October 28, 2018, Burlinova informed the FSB Officer that she needed extra money for her upcoming travel to the United States, where she intended to have many meetings over two weeks. Burlinova stated that grant money alone would not allow her to stay in the United States for as long as she intended. The FSB Officer replied the following day that he would discuss the issue and that most likely it would work out. On October 31, 2018, the FSB Officer informed Burlinova that the decision had been made and that 150,000 rubles had been ordered.

27. On October 31, 2018, Burlinova was issued a visa to travel to the United States for business/tourism purposes. In her visa application submitted earlier that month, Burlinova had informed U.S. authorities that she planned to travel to the United States from November 12-26, 2018, and to visit a named U.S. university. The visa application stated that PICREADI was paying for her travel, and did not include any information about FSB funding.

28. Also on October 31, 2018, a Russian national working on behalf of PICREADI sent an email, copying Burlinova, to an individual at a U.S. university that stated, among other things:

[N]atalia Burlinova and I represent Creative Diplomacy, a Moscow-based NGO [non-governmental organization] specializing in public diplomacy research,

training, and events. We are visiting New York, D.C., and Boston this November with two main goals: 1) to promote Meeting Russia, a 3-day program on Russia's foreign policy for young professionals...[and] 2) to introduce the work of Creative Diplomacy more generally....

29. On November 7, 2018, Burlinova provided to the FSB Officer a list of individuals and organizations she expected to meet with on her upcoming trip to the United States.

30. On November 12, 2018, Burlinova traveled by air to the United States, landing at Dulles International Airport, in Virginia. Burlinova traveled with another Russian national who was working on behalf of PICREADI.

31. Between November 12-26, 2018, Burlinova and the other Russian national working on behalf of PICREADI attended meetings at several U.S. universities and other organizations in an effort to recruit participants for the 2019 Meeting Russia program. The meetings occurred on at least November 14, 15, and 16, in at least two different metropolitan areas in the United States. Some meetings occurred in the District of Columbia. Participants in the meetings sent emails to Burlinova after the meetings, expressing interest for themselves or others in the upcoming Meeting Russia program.

32. On November 15, 2018, while Burlinova was in the United States, the FSB Officer reminded Burlinova that they had agreed to announce her trip to the United States, and he asked for a sample program and information on each person or institution with which Burlinova was meeting.

33. Also on November 15, 2018, Burlinova sent to the FSB Officer several photographs of her meetings with U.S. citizens at the U.S. universities, and updated him on her various meetings in the United States.

34. On November 23, 2018, while in the United States, Burlinova asked the FSB Officer if he needed anything from her before the end of the week. The FSB Officer responded

that he hoped everything was going according to schedule and that she could provide details of her trip to him soon.

35. Burlinova departed the United States from Dulles International Airport on November 26, 2018.

36. On November 29, 2018, the FSB Officer reminded Burlinova that she had agreed to provide information to him summarizing the results of the trip. Burlinova replied that she had sent the materials to him in a “secret chat” using an encrypted messaging application. Burlinova also provided to the FSB Officer using electronic communications over 60 photographs of her meetings at the U.S. universities earlier that month. On November 30, 2018, the FSB Officer told Burlinova that he was still processing all of the information that she had provided and expressed great satisfaction with Burlinova’s activities in the United States.

37. On January 21, 2019, around two months before the scheduled 2019 Meeting Russia program, the FSB Officer asked Burlinova if he and she would be meeting soon to plan this event. Burlinova responded that she would send to him the list of participants so that he could look and check it. The FSB Officer later informed Burlinova that he had reviewed the list and sent it for verification, and commended Burlinova for choosing a better set of participants this year.

38. On January 30, 2019, Burlinova asked the FSB Officer for feedback on the list of participants for the upcoming 2019 Meeting Russia program. The FSB Officer responded that everything was excellent and that no one had any problems with the list of participants.

39. On February 13, 2019, the FSB Officer instructed Burlinova to request passports from the Meeting Russia participants for their visas and said that he would check on the status of the visas.

40. On March 20, 2019, Burlinova sent to the FSB Officer the final list of participants and the agenda for the 2019 Meeting Russia program.

41. The 2019 Meeting Russia program was held in Moscow from March 28-30, 2019. U.S. citizens travelled to Russia to participate in the program.

42. On April 1, 2019, the FSB Officer told Burlinova that he had nearly finished his report of the 2019 Meeting Russia program and requested that she describe to him the reactions of the participants and the prospects of further work with them.

43. On April 16, 2019, Burlinova sent a message to the FSB Officer stating that she would be near Lubyanka Square (where the FSB's headquarters was located) the next day and offering to meet. The FSB Officer asked Burlinova if she had written what they had agreed, stating that this was very important and requesting that no one see the report she was writing since that could lead to questions about why she was doing that.

44. On May 17, 2019, the FSB Officer asked Burlinova to send to him some information on Burlinova's activities because his reports were due every Friday.

45. On May 28, 2019, the FSB Officer requested that he and Burlinova meet with the FSB Officer's boss, who had a proposal to discuss with the FSB Officer and Burlinova. Burlinova asked how dangerous this would be for her and if this would threaten her in any way. The FSB Officer replied that he trusts his boss, that he and his boss had been working together for a long time, and that his boss would defend their interests before the higher leadership.

46. On October 30, 2020, the FSB Officer forwarded to Burlinova an article written by a participant in the 2019 Meeting Russia program, which argued that Russian malign influence efforts were actually legitimate uses of state soft power. The FSB Officer commented to Burlinova that the article was a huge result for them and would be revolutionary if printed by a named English-language newspaper in the United States and a named English-language newspaper in Europe.

47. Burlinova and the FSB Officer continued to communicate throughout 2020 and at least into 2021. On July 2, 2021, for example, the FSB Officer stated to Burlinova that they were working together to change the rhetoric of the West.

48. At no time did Burlinova notify the Attorney General, whose office is located in the District of Columbia, that Burlinova would and did act in the United States as an agent of a foreign government.²


² Pursuant to 28 C.F.R. § 73.3(b) and (c), foreign agents engaged in certain law enforcement or judicial activities may make their notifications to Interpol, an FBI Legal Attaché, or the Department of Justice's Office of International Affairs. Burlinova did not fall into the categories of foreign agents who would make notifications to these entities.

CONCLUSION

49. For the reasons stated herein, there is probable cause to believe that Burlinova (1) conspired with one or more persons to violate Title 18, United States Code, Section 951, in violation of Title 18, United States Code, Section 371, and (2) acted in the United States as an agent of a foreign government without providing prior notification to the Attorney General, as required by law, in violation of Title 18, United States Code, Section 951.

50. I declare under penalty of perjury that the information provided herein is true and accurate to the best of my knowledge.

Respectfully submitted,



AARON P. STEKETEE
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on April 17th, 2023.

THE HONORABLE MOXILA A. UPADHYAYA
UNITED STATES MAGISTRATE JUDGE