

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
PIERRE GIRGIS, :
:
Defendant. :
:
- - - - - X

SEALED INDICTMENT

22 Cr.

22 CRIM 006

COUNT ONE

(Conspiracy to Act as an Agent of a Foreign Government
Without Notifying the Attorney General)

The Grand Jury charges:

Overview

1. From at least in or about 2014, up to and including in or about April 2019, PIERRE GIRGIS, the defendant, acted in the United States as an agent of the Arab Republic of Egypt (the "Egyptian Government") without notifying the Attorney General of the United States as required by law. GIRGIS, a dual citizen of Egypt and the United States, operated at the direction and control of multiple employees of the Egyptian Government in an effort to further in the United States the interests of the Egyptian Government.

2. At the direction of Egyptian Government personnel, PIERRE GIRGIS, the defendant, among other things: tracked and obtained information regarding political opponents of Egyptian president Abdel Fattah el-Sisi ("el-Sisi"); and leveraged his

connections with local U.S. law enforcement officers to collect non-public information at the direction of Egyptian officials, arrange benefits for visiting Egyptian officials, and arrange meetings between U.S. and Egyptian law enforcement.

3. On or about May 7, 2018, an Egyptian Government official ("Egyptian Official-1") and PIERRE GIRGIS, the defendant, exchanged encrypted communications referencing GIRGIS's status as an agent of the Egyptian Government.¹ During the conversation, Egyptian Official-1 expressed frustration that GIRGIS had communicated with personnel from a different Egyptian agency:

[I]t is not possible to open with all the agencies. I'm letting you open with us only. Everything I have stated has been written and sent to Egypt. All this talk has been written and sent to Egypt Seriously, you are humiliating me, you have no idea what can happen. This way the good things you do, you ruin in a second. I'm the one to be humiliated because you do not listen to my words. . . . I had warned you, and you insist on opening with [another Egyptian agency]. This way you are hurting me Really I'm very, very sad. Because you do a lot of good things, but you ruin them in a second, not just that, you are also hurting me.

Later in the encrypted messaging exchange, Egyptian Official-1 advised GIRGIS that other Egyptian Government agencies "want sources for themselves, and you [GIRGIS] have become an important source for them to collect information." GIRGIS responded, "I

¹ The statements described in this Indictment are set forth in substance and in part.

know and I see and I learn from you," and then informed Egyptian Official-1, "it will not be repeated again."

4. On or about March 8, 2019, PIERRE GIRGIS, the defendant, and Egyptian Official-1 discussed an upcoming trip of certain Egyptian officials to the United States. During that conversation, GIRGIS stated, "Tell me what you want me to do," to which Egyptian Official-1 responded by inquiring about GIRGIS's relationship with a particular U.S. law enforcement officer. Egyptian Official-1 then instructed GIRGIS "to ask [the U.S. law enforcement officer] for something. We want you to find out if there are any police trainings happening in Manhattan in the coming days, and if so, who are the people in charge of these trainings? We would like to attend." Later in the conversation, GIRGIS again asked, "What you want me to do?", and Egyptian Official-1 directed GIRGIS, "Make follow up, Ok?", and GIRGIS agreed by responding, "Ok."

STATUTORY ALLEGATIONS

5. From at least in or about 2014, up to and including at least in or about April 2019, in the Southern District of New York and elsewhere, PIERRE GIRGIS, the defendant, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, 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.

6. It was a part and an object of the conspiracy that PIERRE GIRGIS, the defendant, and others known and unknown, knowingly acted in the United States as an agent of a foreign government, to wit, the Arab Republic of Egypt, without prior notification to the Attorney General, as required by law, in violation of Title 18, United States Code, Section 951.

Overt Acts

7. In furtherance of the conspiracy and to effect the illegal object thereof, PIERRE GIRGIS, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about April 3, 2017, GIRGIS sent information about an anti-el-Sisi activist that he had received from Egyptian Government officials to a local U.S. law enforcement officer.

b. On April 9, 2017, GIRGIS sent a photograph that he had received from an Egyptian Government official to a local U.S. law enforcement officer.

c. On or about November 28, 2017, GIRGIS sent an identification card for a particular individual that he had received from an Egyptian Government official to a local U.S. law enforcement officer. GIRGIS relayed back to the Egyptian Government official questions GIRGIS had received from a local U.S. law enforcement officer.

d. On or about May 7, 2018, GIRGIS and Egyptian

Official-1 exchanged electronic communications.

e. On or about March 8, 2019, GIRGIS communicated with Egyptian Official-1 official over the telephone.

f. In or about March 2019, GIRGIS arranged and attended a meeting between Egyptian law enforcement and local U.S. law enforcement.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Acting as an Agent of a Foreign Government
Without Notifying the Attorney General)

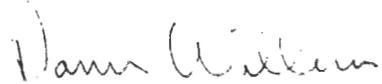
The Grand Jury further charges:

8. The allegations contained in Paragraphs One through Three of this Indictment are repeated and realleged as if fully set forth herein.

9. From at least in or about 2014, up to and including at least in or about April 2019, in the Southern District of New York and elsewhere, PIERRE GIRGIS, the defendant, knowingly acted in the United States as an agent of a foreign government, namely, the Arab Republic of Egypt, without prior notification to the Attorney General, as required by law.

(Title 18, United States Code, Sections 951 and 2.)

FOR PERSON



DAMIAN WILLIAMS
United States Attorney

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UNITED STATES OF AMERICA

v.

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Defendant.

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(18 U.S.C. §§ 371, 951, and 2.)

DAMIAN WILLIAMS

United States Attorney

proreperson

11/9/22

Filed Indictment under Seal
Arrest warrant issued

USAT Lehigh

MCA