UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

SEALED

UNITED STATES OF AMERICA

v.

CASE NO. 8:22-cr-259-WFJ-AEP
18 U.S.C. § 371
18 U.S.C. § 951

ALEKSANDR VIKTOROVICH IONOV
a/k/a "Alexander Ionov,"
a/k/a "Sasha,"
YEGOR SERGEYEVICH POPOV,
a/k/a "Egor,"
a/k/a "Yegorka,"
ALEKSEY BORISOVICH SUKHODOLOV,
a/k/a "Borisych,"
a/k/a "AB,"
a/k/a "X2,"
OMALI YESHITELA,
a/k/a "Joseph Waller,"
PENNY JOANNE HESS,
JESSE NEVEL,
a/k/a "Jesse Nevelsky," and
AUGUSTUS C. ROMAIN, JR.,
a/k/a "Gazi Kodzo"

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

A. Introduction

At times material to this Superseding Indictment:

1. From at least as early as October of 2013, ALEKSANDR VIKTOROVICH IONOV ("IONOV") worked with officers of the Federal Security Service of the Russian Federation (Federal'naya Sluzhba Bezopasnosti Rossiyskoy Federatsii, "FSB"), as described in more detail below, to use members of various

U.S. political groups as foreign agents of Russia within the United States, without notification to the Attorney General. Working under FSB supervision and with FSB support, IONOV recruited members of these political groups within the United States and other countries, including Ukraine, Spain, the United Kingdom, and Ireland, to attend conferences in Russia. These conferences were sponsored by the Anti-Globalization Movement of Russia and funded by the Russian government. At these conferences, IONOV entered into partnership with certain U.S. separatist groups who were advocating for separation from the authority of the United States, including groups from Florida and California. Thereafter, IONOV exercised direction or control over these groups on behalf of the FSB. IONOV also monitored and regularly reported on their activities to the FSB.

2. Specifically, IONOV provided financial support to these groups on behalf of the FSB; directed these groups to publish pro-Russian propaganda, as well as other information designed to cause dissension in the United States and to promote secessionist ideologies; coordinated and funded action by these groups within the United States that was designed to further Russian interests; and coordinated coverage of these groups' activities in Russian media outlets. IONOV relayed detailed information about his activities and the activities of these separatist groups to his FSB handlers.

3. Among IONOV's many illegal actions as an agent of the FSB were his efforts, in conjunction with Moscow-based FSB officers ALEKSEY BORISOVICH SUKHODOLOV ("SUKHODOLOV"), YEGOR SERGEYEVICH POPOV

("POPOV"), and other FSB Officers, to interfere directly and substantially in democratic elections in the United States by clandestinely funding and directing the political campaign of a particular candidate. Specifically, and as set forth in more detail below, POPOV, SUKHODOLOV, and other FSB officers supervised IONOV's efforts to actively direct the campaign of a candidate for local political office in St. Petersburg, Florida, in 2019, with POPOV expressly referring to this effort on behalf of the FSB as "our election campaign." Moreover, throughout the 2019 election season, IONOV regularly communicated with SUKHODOLOV, POPOV, and other FSB officials to provide information and updates regarding their joint efforts to fund and direct that campaign. Among these communications, as described in more detail below, IONOV reported that he had made donations to the campaign and had been consulting weekly with the campaign, and he referred to the candidate as the "candidate whom we supervise."

4. IONOV and POPOV intended that this election interference plot extend beyond the 2019 local election cycle in St. Petersburg, Florida. On or about January 31, 2020, POPOV expressly directed IONOV to turn his efforts to the upcoming "USA Presidential election," which he described as the "main topic of the year." Shortly after the 2020 U.S. presidential election, on or about November 13, 2020, IONOV drafted a report for POPOV, describing how he had funded a protest in Washington, D.C., and explaining that the prior campaigns for local office that he had supported in Florida would make it possible "to carry out more effective

campaigns during municipal elections" and "lay the groundwork for a new electoral base."

5. Relevant to the allegations set forth herein are the following individuals, entities, and organizations:

6. ALEKSANDR VIKTOROVICH IONOV was a citizen of the Russian Federation ("Russia") who resided in Moscow, Russia. IONOV was the founder and president of the Anti-Globalization Movement of Russia ("AGMR"), headquartered in Moscow, Russia. According to its website, AGMR advocated for "the full sovereignty of nation-states including the sovereignty of Russia as an independent player on the political, economic and cultural world stage." AGMR was funded by the Russian government through government grants.

7. YEGOR SERGEYEVICH POPOV was a citizen of Russia who resided in Moscow, Russia. POPOV was employed as an FSB officer. 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.

8. ALEKSEY BORISOVICH SUKHODOLOV was a citizen of Russia and a supervisory FSB officer residing in Moscow, Russia. SUKHODOLOV served as a unit chief in the FSB's Constitutional Protection Directorate. As set forth in more detail below, SUKHODOLOV directed and oversaw POPOV and IONOV's activities, with POPOV acting as IONOV's immediate handler. The arrangement was described, in part, in a series of communications from POPOV to IONOV on or

about August 21, 2018: "Don't do anything without me or [SUKHODOLOV] anymore. . . . Because I am the only person responsible for working with you. [SUKHODOLOV] oversees and manages everything. . . . These are important internal formalities. Please do not violate them. This can have serious consequences."

9. FSB OFFICER 2, whose identity is known to the Grand Jury, was a citizen of Russia and an FSB officer residing in Moscow, Russia. FSB OFFICER 2 worked with POPOV and would coordinate with IONOV on behalf of the FSB when POPOV was unavailable. FSB OFFICER 2 also reported to SUKHODOLOV.

10. FSB OFFICER 3, whose identity is known to the Grand Jury, was a citizen of Russia and an FSB officer residing in Moscow, Russia. FSB OFFICER 3 worked with POPOV and would coordinate with IONOV on behalf of the FSB. FSB OFFICER 3 also reported to SUKHODOLOV.

11. The African People's Socialist Party and the Uhuru Movement (collectively, the "APSP") was a political group based in St. Petersburg, Florida. The APSP promoted its views using multiple media outlets, including websites it operated, social media, and a radio station.

12. OMALI YESHITELA ("YESHITELA") was a United States citizen residing in St. Petersburg, Florida, and St. Louis, Missouri, and the founder and chairman of the APSP. In May of 2015, YESHITELA traveled to Russia and entered the APSP into a partnership with IONOV and AGMR, knowing that IONOV and AGMR were agents of the Russian government.

13. PENNY JOANNE HESS ("HESS") was a United States citizen residing in St. Petersburg, Florida, and St. Louis, Missouri, and a leader of a component of the APSP. HESS facilitated communications between IONOV and YESHITELA.

14. JESSE NEVEL ("NEVEL") was a United States citizen residing in St. Petersburg, Florida, and St. Louis, Missouri, and a member of a component of the APSP. NEVEL ran for local political office in St. Petersburg in 2017.

15. Unindicted Co-conspirator 4 ("UIC-4"), whose identity is known to the Grand Jury, was a United States citizen residing in St. Petersburg, Florida, and the Director of Agitation and Propaganda of the APSP. UIC-4 ran for local political office in St. Petersburg in 2017 and 2019.

16. AUGUSTUS C. ROMAIN, JR. ("ROMAIN") was a United States citizen residing in St. Petersburg, Florida, and Atlanta, Georgia. ROMAIN served as the Secretary General of the APSP until approximately November of 2018. In or around November of 2018, ROMAIN left the African People's Socialist Party and founded Black Hammer, which was a political group based in Atlanta, Georgia. As recently as June of 2022, ROMAIN and Black Hammer—acting at the direction or control of, and with funding from, IONOV and AGMR—engaged in direct action within the United States to further the interests of Russia in relation to the Russian invasion of Ukraine.

17. U.S. Political Group 3 was a political group based in California. U.S. Political Group 3's primary goal was the promotion of California's secession from the United States.

18. Unindicted Co-conspirator 6 ("UIC-6") was a United States citizen who resided in Russia and California. UIC-6 was the founder and president of U.S. Political Group 3. UIC-6 received funding from IONOV to support protests and political activities within the United States, and UIC-6 traveled to the United States to engage in these activities. IONOV funded these activities on behalf of the FSB, with the stated goal of causing turmoil within the United States.

19. At no time relevant to this Superseding Indictment were IONOV, POPOV, FSB OFFICER 2, FSB OFFICER 3, YESHITELA, HESS, NEVEL, ROMAIN, or any of their co-conspirators duly accredited diplomatic or consular officers; officially and publicly acknowledged and sponsored officials or representatives of the Russian Federation as it relates to the activities alleged in this Superseding Indictment; or officially and publicly acknowledged and sponsored staff members or employees thereof.

20. At no time did any of the Defendants, or any of their co-conspirators, notify the Attorney General that they would and did act in the United States as an agent of a foreign government and officials thereof.

B. Background on Russian Foreign Influence Operations

21. Among the foreign policy objectives of Russian government leadership was to expand Russia's sphere of influence. Russia targeted the United States and its

allies, as well as other countries, to further that goal. Through these influence operations, Russia attempted to shape foreign perceptions and to influence populations by, among other things, seeking to create wedges that reduce trust and confidence in democratic processes, degrade democratization efforts, weaken U.S. partnerships with European allies, undermine Western sanctions, encourage anti-U.S. and anti-Western political views, and counter efforts to bring Ukraine and other former Soviet states into European and international institutions.

22. Russian influence operations often used social media targeted at U.S. and global audiences to sow discord and mistrust in the United States' and other countries' political systems, to disseminate disinformation to confuse and mislead citizens in the United States, Europe, and Russia itself, and to recruit U.S. persons to advance Russia's operational goals.

23. As part of these efforts, Russia recruited and forged ties with persons and groups around the world who were positioned to amplify and reinforce Russia's messaging campaigns in furtherance of its goal of destabilizing Western societies. These efforts included the use of nonprofit organizations as fronts to promote connections between Russia and its compatriots living abroad, to propagate disinformation, and to surreptitiously seek access to foreign officials, businesspersons, and other figures, in the United States and elsewhere, to advance and promote Russian interests.

24. Beyond influence campaigns, the Russian Federation, through its intelligence services such as the FSB, is known to have sought to covertly interfere

with and subvert the democratic processes of other sovereign nations, as alleged herein.

C. The Conspiracy

25. Beginning on an unknown date, but at least as early as in or around November of 2014, and continuing until on or about July 29, 2022, in the Middle District of Florida, Russia, and elsewhere, the defendants,

ALEKSANDR VIKTOROVICH IONOV
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ALEKSEY BORISOVICH SUKHODOLOV,
a/k/a "Borisych,"
a/k/a "AB,"
a/k/a "X2,"
OMALI YESHITELA,
a/k/a "Joseph Waller,"
PENNY JOANNE HESS,
JESSE NEVEL,
a/k/a "Jesse Nevelsky," and
AUGUSTUS C. ROMAIN, JR.,
a/k/a "Gazi Kodzo,"

did knowingly and willfully combine, conspire, and agree with each other and other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to act as an agent of a foreign government and foreign officials, to wit, the Russian Federation and officials of that government, without prior notification to the Attorney General, as required by law, in violation of 18 U.S.C. § 951(a).

D. Manner and Means

26. The manner and means by which the co-conspirators sought to accomplish the objects of the conspiracy included, among others:

a. It was part of the conspiracy that, for the purpose of establishing relationships that could further the interests of the Russian Federation, IONOV would and did recruit and sponsor representatives of separatist groups within the United States and elsewhere, including YESHITELA, UIC-6, and others, to travel to pro-separatist conferences in Moscow, Russia, that were sponsored by AGMR and the Russian Federation;

b. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV would and did communicate through encrypted electronic messaging applications and in-person meetings with POPOV, SUKHODOLOV, FSB OFFICER 2, FSB OFFICER 3, and others for the purpose of developing and executing a plan to recruit, fund, and direct U.S. Political groups, including the APSP, Black Hammer, and U.S. Political Group 3, which plan included funding and consulting with campaigns for elected office within the United States;

c. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV and U.S.-based co-conspirators acting at his direction would and did engage in "agitprop," or "agitation and propaganda," by writing articles that contained Russian propaganda and disinformation, and sending these articles by email or encrypted electronic messages

to YESHITELA, HESS, NEVEL, and others working on behalf of the APSP, with instructions to publish them in the APSP's media outlets;

d. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, the APSP would and did publish articles authored by IONOV, author and publish articles at IONOV's direction, permit IONOV to speak on behalf of the Russian Federation during online multimedia presentations, and make public statements in support of the Russian Federation and its interests when directed to by IONOV;

e. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV and AGMR would and did exercise direction or control over – and provide financial support, consulting, instruction, and promotion in Russian media outlets to – the APSP, Black Hammer, and U.S. Political Group 3 in support of protests, political campaigns, and other actions within the United States;

f. It was further part of the conspiracy that, for the purpose of advancing the interests of the Russian Federation, IONOV would and did utilize his connections within Russian state-supported media to promote international awareness of the activities that he had directed the APSP, Black Hammer, and U.S. Political Group 3 to undertake;

g. It was further part of the conspiracy that, in order to further the objects of the conspiracy, IONOV directed YESHITELA, HESS, NEVEL, ROMAIN, UIC-6, and others to provide him detailed information regarding the

activities of the APSP, Black Hammer, U.S. Political Group 3, and other groups in the United States, which IONOV compiled into reports for FSB officials;

h. It was further part of the conspiracy that, in order to further the objects of the conspiracy, the co-conspirators, including IONOV, YESHITELA, HESS, NEVEL, UIC-4, ROMAIN, UIC-6, and others would and did communicate over email, encrypted electronic messaging applications, and voice and video calls about funding, joint actions, and other matters related to the conspiracy;

i. It was further part of the conspiracy that, in order to further the objects of the conspiracy, IONOV would and did utilize his assistants to facilitate English-language communications with YESHITELA, HESS, NEVEL, ROMAIN, and others over email, encrypted electronic messaging applications, or voice and video calls;

j. It was further part of the conspiracy that, in order to further the objects of the conspiracy, IONOV would and did meet FSB officials in person in Russia for the purpose of exchanging reports, information, and money relating to the activities of the APSP, Black Hammer, and U.S. Political Group 3, including as related to the funding and direction of candidates for elected office within the United States;

k. It was further part of the conspiracy that, in order to further the objects of the conspiracy, IONOV and his co-conspirators would and did take steps to conceal and obfuscate financial transactions in furtherance of the conspiracy, including through the use of multiple bank accounts and cryptocurrency and the

structuring of financial transactions in order to thwart detection by law-enforcement and other governmental agencies;

l. It was further part of the conspiracy that, in order to further the objects of the conspiracy, co-conspirators would and did employ various techniques to protect their anonymity and to thwart detection of their activities by law-enforcement and other governmental agencies; and

m. It was further part of the conspiracy that, in order to further the objects of the conspiracy, co-conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

E. Overt Acts

27. In furtherance of the conspiracy, and to effect the objects thereof, at least one of the co-conspirators committed or caused to be committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

May 2015 Meeting in Moscow

1. On or about May 13, 2015, defendant IONOV sent an email inviting defendant YESHITELA to Moscow, Russia, for an "All expenses paid (travel + accommodations)" visit.

2. On or about May 20, 2015, defendant IONOV caused an electronic message to be sent to defendant HESS stating that the purpose of

defendant YESHITELA's trip to Russia would be to "communicate on future cooperation."

3. On or about May 21, 2015, defendant HESS sent an electronic message to defendant IONOV's assistant, stating that defendant YESHITELA had requested to "meet with an official representative of the Russian government" and to "meet with members of the embassies of Cuba, Venezuela, Iran, North Korea and Syria."

4. On or about May 26, 2015, defendant YESHITELA traveled from Tampa, Florida, to Moscow, Russia, on behalf of the APSP for the purpose of meeting with defendant IONOV.

2015 United Nations Petition

5. On or about July 30, 2015, defendant IONOV caused electronic messages to be sent to defendant HESS directing HESS to draft a "petition on Genocide of African people in U.S." so that AGMR could "start pushing it on media everywhere."

6. On or about August 5, 2015, defendant HESS sent electronic messages to defendant IONOV's assistant, stating, "Here is a draft of the petition," and "I think we could have a more completed piece by Aug. 12," and asking "When do you plan to do this? And where: Geneva? I would like to see if Chairman Omali Yeshitela and others could attend this."

7. On or about August 6, 2015, defendant IONOV caused an electronic message to be sent to defendant HESS, stating, "you could pass it to UN

mission in US signed by many organizations including ours," and, "we can only position ourself as co-writers/supporters – after all, we're not exactly Black to demand it for ourselves."

8. On or about August 13, 2015, defendant IONOV caused electronic messages to be sent to defendant HESS directing HESS to write a petition to the United Nations "ASAP" alleging that the United States had committed genocide against African people in the United States and also directing HESS to send the petition to the "UN office in New York and to the websites of White House" and a petition website.

9. On or about August 17, 2015, defendant NEVEL sent electronic messages to defendant IONOV's assistant, asking when IONOV would "donate another $500" to a component of the APSP, and stating that he and defendant HESS would be "working on the petition tomorrow morning."

10. On or about August 20, 2015, defendant IONOV caused electronic messages to be sent to defendant HESS directing HESS to post the genocide petition that day on a petition website and "the site of the White House" because defendant IONOV and AGMR wanted to spread the petition over their "influential information resources" and raise awareness around the world.

11. On or about August 23, 2015, defendant IONOV sent electronic messages to defendant HESS, stating that he had donated $500.00 to the APSP.

12. On or about August 26, 2015, defendant HESS caused the APSP to post a "Petition on Crime of Genocide against African People in the United States" on a petition website and to promote the petition on its own news website.

13. On or about August 28, 2015, defendant IONOV caused an electronic message to be sent to defendant HESS stating that the petition had been translated into Russian and would spread over Russian media outlets.

14. On or about September 5, 2015, defendant HESS sent an electronic message to defendant IONOV's assistant, stating that she had caused the petition to be electronically transmitted to the United Nations Secretary General and to the United Nations General Assembly.

September 2015 Dialogue of Nations Conference

15. On or about August 25, 2015, defendant IONOV caused an electronic message to be sent inviting defendant YESHITELA to a "Dialogue of Nations" Conference hosted by IONOV and AGMR in Moscow, Russia, that would be attended by representatives of separatist movements from different parts of the world, including those from the Russia-backed breakaway state in the Donbas region of Ukraine, the "Donetsk People's Republic."

16. On or about September 16, 2015, defendant YESHITELA traveled from Tampa, Florida, to the "Dialogue of Nations" separatist conference in Moscow, Russia, that was hosted by defendant IONOV and AGMR and funded by the Russian government.

17. On or about September 23, 2015, defendant NEVEL sent an email to defendant YESHITELA, defendant HESS, and other members of the APSP that contained YESHITELA's summary of his trip to the "Dialogue of Nations" separatist conference in Moscow, Russia, which stated, in part, that AGMR is "a solid institution of Russian politic" and that it was "clear" that AGMR was an "instrument of Russian government," which, YESHITELA stated, did not "disturb us."

18. On or about September 30, 2015, one or more of the co-conspirators caused an email to be sent to several members of the APSP, including defendant YESHITELA, defendant HESS, defendant NEVEL, and defendant ROMAIN, which stated, in part, that the APSP recognized that the Russian Government was "more than likely" using AGMR to engage "the U.S. and Europe in serious struggle," and that AGMR was "carrying out it's own agenda - to utilize forces inside of the U.S. to sew division inside the U.S."

2016 Reparations Tour

19. On or about January 17, 2016, defendant HESS drafted a letter to defendant IONOV requesting that AGMR provide approximately $12,000 in funding for a "four-city tour," and thanking IONOV for his "solidarity with these actions" and for his "leadership in envisioning such actions."

20. On or about January 21, 2016, defendant IONOV caused an electronic message to be sent to defendant HESS that contained a "Guarantee letter" that IONOV had signed, which stated that IONOV promised to pay the APSP

$12,000 to organize a "four-city tour from 22 to 29 January, 2016" related to the genocide petition.

21. On or about January 25, 2016, defendant IONOV caused an electronic message to be sent to defendant HESS asking the APSP to involve as many people as possible in the four-city tour to show that people are opposing the "US colonial government."

22. On or about February 1, 2016, defendant IONOV caused an electronic message to be sent to defendant HESS, directing the APSP to draft a detailed report describing the four-city tour that AGMR had funded to raise awareness for the genocide petition.

23. On or about February 4, 2016, defendant HESS drafted a document entitled, "Meeting to sum up the Encampment Tour," which summarized remarks that defendant YESHITELA had made concerning the four-city tour, including that the APSP had "developed a relationship with forces in Russia who are involved in their own struggle with the US," that the "Russians have to justify their getting resources for this" and "want information to work with," and asking, "Will the Russians get from us what they need."

24. On or about February 4, 2016, defendant IONOV caused a wire transfer in the amount of approximately $3,476.20 to be sent to the APSP.

25. On or about February 5, 2016, defendant HESS sent an electronic message to defendant IONOV's assistant containing a report from the APSP summarizing the APSP's four-city tour.

26. On or about February 16, 2016, defendant IONOV caused a wire transfer in the amount of approximately $3,476.20 to be sent to the APSP.

Article Concerning Russian Olympic Team

27. On or about July 29, 2016, defendant IONOV caused an electronic message to be sent to defendant HESS requesting that defendant YESHITELA or the APSP make a statement in support of the Russian Olympic team, which faced criticism ahead of the 2016 Summer Olympics after it was disclosed that Russian athletes had previously taken part in a state-run doping program.

28. On or about July 29, 2016, defendant HESS sent an email to defendant YESHITELA concerning a draft statement from the APSP in support of the Russian Olympic team.

29. On or about July 30, 2016, defendant YESHITELA sent an email to defendant HESS stating, "This is good, but it should read that we stand in solidarity with the people and government of Russia in its struggle for the right to participate in the rio Olympic and engage freely in international affairs without military and political interference from diminishing U.S. And European powers."

30. On or about August 1, 2016, defendant HESS caused the APSP to publish an anonymous article on its news website titled "Imperialists ban Russia from 2016 Olympic Games! APSP says 'let Russia play.'"

2017 St. Petersburg, Florida Election

31. On or about July 20, 2017, defendant IONOV caused an electronic message to be sent to defendant NEVEL, requesting an interview with NEVEL to talk about "reparations" and NEVEL's plans to seek local office, and offering AGMR's assistance to NEVEL, including "campaign finance."

2018 Demonstration in California

32. On or about January 25, 2018, defendant IONOV sent an electronic message to UIC-6 in Russian regarding a demonstration that UIC-6 was planning at the California Capitol building in Sacramento, California, and mentioning the possibility of providing funding for the event.

33. On or about January 27, 2018, defendant IONOV sent an electronic message to UIC-6 in Russian regarding the demonstration that UIC-6 was planning and urging UIC-6 to physically enter the governor's office.

34. On or about February 5, 2018, UIC-6 sent electronic messages to defendant IONOV that contained proposed designs for posters for an upcoming demonstration in support of California's secession from the United States.

35. On or about February 7, 2018, defendant IONOV sent an electronic message to UIC-6 in Russian stating that he had transferred $500.00 to UIC-6.

36. On or about February 8, 2018, defendant IONOV sent electronic messages to POPOV, containing photographs that UIC-6 had sent to defendant IONOV and advising POPOV in Russian that the "posters" had been paid for.

37. On or about February 14, 2018, UIC-6 led a demonstration on behalf of U.S. Political Group 3 in support of California's secession from the United States at the California Capitol building in Sacramento, California.

38. On or about February 15, 2018, defendant IONOV sent electronic messages to UIC-6 asking for additional information about and pictures of the demonstration "within two hours."

39. On or about March 12, 2018, defendant IONOV sent electronic messages to defendant POPOV containing news articles about UIC-6 and the California secession movement and noting, in Russian, that POPOV had asked for "turmoil" and "there you go."

International Committee for the Protection of Human Rights

40. On or about February 16, 2018, defendant IONOV sent a photograph to defendant POPOV depicting an AGMR banner hanging inside of the APSP headquarters in St. Petersburg, Florida.

41. On or about March 1, 2018, defendant IONOV sent a photograph to defendant SUKHODOLOV depicting an AGMR banner hanging inside of the APSP headquarters in St. Petersburg, Florida.

42. On or about June 18, 2018, defendant IONOV sent a Russian language report to defendant SUKHODOLOV, describing IONOV's work on the International Committee for the Protection of Human Rights, and stating that IONOV had "major connections" in Russian public and political organizations.

43. On or about November 14, 2018, defendant IONOV caused an electronic message to be sent to defendant HESS, which stated:

> Dear comrade,
>
> On behalf of the Antiglobalization Movement of Russia we express our deepest respect to you! We have recently begun the project on the base of International Committee for the Protection of Human Rights which is the partner of the UN. Alexander Ionov is a current counselor and plenipotentiary representative of the Committee. The project refers to the protection of legal interests and human rights of Russian nationalities who were arrested by the US on the territory of the third countries. Russian Federation regards these facts as kidnapping and blatant violation of their rights that require strict investigation by Russian investigation agencies and diplomats.
>
> International Committee for the Protection of Human Rights is welcoming you to be come our expert on protection of human rights in the USA to assess the actions of the US government towards Russian nationalities. We are hoping for your assistance and protection of the interests of Russian people who were illegally brought to US and put to torture.
>
> Best regards,
> Alexander Ionov

2019 St. Petersburg, Florida Election

44. On or about March 20, 2019, defendant POPOV sent an electronic message to defendant IONOV that contained a public media report linking IONOV to fundraising for the defense of convicted Russian foreign agent Mariia Butina, and POPOV commented that the article had called IONOV the "patron of

Butina, who admitted to interfering in the 2016 elections," and warned IONOV that sanctions would be imposed against him.

45. On or about June 28, 2019, defendant IONOV sent electronic messages in Russian to defendant SUKHODOLOV about UIC-4's campaign for local office in St. Petersburg, Florida, adding that the elections would take place on August 26 and that IONOV had been "consulting every week."

46. On or about June 28, 2019, defendant SUKHODOLOV sent an electronic message in Russian to defendant IONOV, stating that it would be "good" if UIC-4 won the election for local office in St. Petersburg, Florida.

47. On or about June 28, 2019, FSB OFFICER 2 sent an electronic message to defendant IONOV in Russian asking how much money had been raised for UIC-4's campaign for local office in St. Petersburg, Florida, and asked whether "450 bucks" was sufficient to organize "a headquarters, agitation materials, etc."

48. On or about June 28, 2019, defendant IONOV sent a voice message in Russian to FSB OFFICER 2 for inclusion in a report that FSB OFFICER 2 was writing for SUKHODOLOV, stating that IONOV had "alone sent 450" for UIC-4's campaign and that other events he had participated in each raised at least $1,500.

49. On or about August 23, 2019, defendant IONOV sent an electronic message to defendant POPOV containing a video of UIC-4 delivering a campaign speech.

50. On or about August 30, 2019, defendant IONOV made a public social media post congratulating UIC-4 for making it past the primary election for local office.

51. On or about September 6, 2019, defendant POPOV sent defendant IONOV an electronic message in Russian asking IONOV to send statistics and information about UIC-4's campaign for inclusion in a report that POPOV was writing for SUKHODOLOV, remarking that "Our election campaign is kind of unique. Are we the first in history?"

52. On or about September 12, 2019, defendant IONOV sent an electronic message to defendant POPOV in Russian addressing the percentage of votes that UIC-4 had won in the primary, referring to UIC-4 as the candidate "whom we supervise."

53. On or about January 31, 2020, defendant POPOV sent electronic messages to defendant IONOV, asking him about the "USA presidential election," and telling him it was the FSB's "main topic of the year."

2020 Dialogue of Nations Conference

54. On or about February 20, 2020, defendant IONOV sent an electronic message to defendant HESS, inviting defendant YESHITELA to another "Dialogue of Nations" separatist conference in Donetsk, Ukraine.

55. On or about April 8, 2020, defendant NEVEL sent an email to defendant YESHITELA and defendant HESS, stating that defendant IONOV had invited him to speak at the 2020 Dialogue of Nations virtual conference.

56. On or about April 30, 2020, defendant IONOV wrote a Russian language report for defendant POPOV, describing an April 20, 2020 "Dialogue of Nations" conference that IONOV and AGMR had hosted, which IONOV wrote had been coordinated with individuals in the Russia-backed "Donetsk People's Republic" and also noting that defendant YESHITELA had spoken at the conference.

57. On or about May 6, 2020, defendant IONOV caused a request to be sent to defendant YESHITELA from "Russia, the Donetsk People's Republic," which stated that the "6th anniversary of the Donetsk People's Republic" was approaching and asking "friends of the Donetsk People's Republic" to send video congratulations to its residents because the pandemic was preventing mass gatherings.

58. On or about May 15, 2020, defendant IONOV sent an electronic message to defendant POPOV, which contained a message from defendant YESHITELA's assistant and a link to a video that YESHITELA had made to congratulate the residents of the Russia-backed "Donetsk People's Republic."

59. On or about May 15, 2020, defendant IONOV wrote a Russian language report for defendant POPOV advising POPOV that the "leader of the Donetsk People's Republic" had asked IONOV to direct U.S. organizations to record "congratulatory messages on the occasion of Republic Day," and noting that the APSP and U.S. Political Group 3 had "recorded their speeches," which "were broadcast on outdoor screens in the center of Donetsk," and further stating that, "For

the first time since the Donetsk People's Republic came into existence, leaders of American nonprofit organizations congratulated citizens."

Reports on U.S. Groups

60. On or about June 12, 2020, defendant IONOV wrote a Russian language report for defendant POPOV reporting on demonstrations in the United States by the APSP and Black Hammer, listing some of the joint programs between AGMR and the APSP, to include conferences that were "consistently sponsored" by AGMR and provided with "information support," as well as activities "in over 40 cities," noting that defendant HESS had told IONOV that activists prepared through "collaboration between AGMR and Uhuru" are taking to the streets and leading the way for "hundreds of people," and that IONOV had held a series of conversations with defendant ROMAIN concerning ongoing demonstrations in the United States.

61. On or about September 10, 2020, defendant IONOV wrote a Russian language report for defendant POPOV, in which he wrote that he and defendant ROMAIN had discussed Black Hammer's recent demonstrations in the United States, and that IONOV had arranged an interview for ROMAIN with a Russian news outlet.

62. On or about November 13, 2020, defendant IONOV wrote a Russian language report for defendant POPOV, in which he wrote that he had participated in a conference with the APSP and had contributed $1,200 toward a protest being conducted by defendant YESHITELA in Washington, D.C., and further writing, in reference to the prior campaigns for local office by defendant

NEVEL and UIC-4, "Going forward, it will allow to carry out more effective campaigns during municipal elections, and [UIC-4's] and Jaycee's experience in the latest election campaign in Florida will lay the groundwork for a new electoral base."

63. On or about January 16, 2021, defendant IONOV wrote a Russian language report for the FSB concerning the history of his relationship with the APSP, explaining that, after defendant YESHITELA had visited Moscow in 2015, AGMR and the APSP had developed a "bilateral cooperation program," and that, based on IONOV's and YESHITELA's agreement, the APSP had conducted a reparations tour in the United States that IONOV had fully financed.

64. On or about March 18, 2021, defendant IONOV wrote a Russian language report for the FSB, in which he wrote that he and defendant ROMAIN had discussed a U.S. news organization's investigation into the relationship between AGMR, the International Committee for the Protection of Human Rights, and Black Hammer.

65. On or about July 16, 2021, defendant IONOV wrote a Russian language report for the FSB concerning the APSP, noting that he had held a video conference call with defendant HESS, who had "expressed hope" that a delegation from the APSP could fly to Moscow to promote their "international standing," and that activists from the APSP had stated that, without AGMR support, they had difficulty getting coverage from the international press.

2022 Russian Invasion of Ukraine

66. On or about February 24, 2022, defendant NEVEL sent an email to defendant YESHITELA and defendant HESS that included a message from defendant IONOV entitled "URGENT MESSAGE FROM THE ANTIGLOBALIST MOVEMENT OF RUSSIA." In the message, IONOV wrote that: "the war with Ukraine has began"; "Russia has exhausted all possible tools to prevent conflict" in Ukraine; "we must remember that the war began 8 years ago, when the US and the EU brought new leadership to power in Kiev"; and "It was the pro-Western neo-fascists who burned people in Odessa and shot thousands of civilians in the Donbas."

67. On or about February 25, 2022, defendant IONOV drafted a Russian language report for FSB OFFICER 3, in which IONOV wrote that he had held emergency phone conversations with leaders of anti-war organizations in the United States relating to the Russian invasion of Ukraine, and that these U.S. groups had adopted a joint statement with AGMR entitled "URGENT MESSAGE FROM THE ANTIGLOBALIST MOVEMENT OF RUSSIA."

68. On or about February 27, 2022, UIC-4 gave a video presentation on behalf of the APSP, in which UIC-4 stated that the APSP and defendant YESHITELA, along with the "leaders of Venezuela, China, Iran, Cuba, and Nicaragua," had spoken in opposition to the "U.S. imperialist-created" crisis in Ukraine and in solidarity with the people of Russia and their elected government and leadership.

69. On or about March 13, 2022, UIC-4 gave a video presentation on behalf of the APSP, in which UIC-4 again stated that the APSP and defendant YESHITELA, along with the "leaders of Venezuela, China, Iran, Cuba, and Nicaragua" had spoken in opposition to the "U.S. imperialist-created" crisis in Ukraine and in solidarity with the people of Russia and their elected government and leadership.

70. On or about March 13, 2022, defendant IONOV spoke by video, with the assistance of a translator, at a video conference hosted by the APSP concerning the Russian invasion of Ukraine, stating that Nazis were in power in Ukraine and were killing innocent people, and that Russia had invaded Ukraine only to stop the killing of Russians by the Ukrainian army.

71. On or about March 17, 2022, defendant YESHITELA spoke at a press conference hosted by the APSP, stating, "the African People's Socialist Party calls for unity with Russia in its defensive war in Ukraine against the world colonial powers," and criticizing a United States social media company that had placed content restrictions on posts that supported Russia's invasion of Ukraine.

72. On or about March 18, 2022, defendant IONOV wrote a Russian language report for FSB OFFICER 3, noting that, during a phone conversation with defendant YESHITELA, he had appealed to the leadership of the APSP to support Russia in the "information war unleashed" by the West, and that, on March 13, 2022, the APSP had hosted a video conference watched by thousands of people

during which participants expressed support for the Russian invasion of Ukraine, and IONOV provided links to several videos recorded by the APSP.

73. On or about March 19, 2022, UIC-4 sent an email to another individual that contained an advertisement for a March 20, 2022 video presentation by defendant IONOV and defendant YESHITELA; after noting that the presentation would discuss "NATO" and "Nazis in Ukraine," UIC-4 signed off the email by writing "APSP Stands with Russia! APSP Stands with Putin!"

74. On or about March 19, 2022, UIC-4 sent an email to defendant IONOV, with a link to a shared document, and stated "Here is a link to the script that we will be using. There are a few questions asked specifically of you, but you are able to contribute to any aspect of the discussion that you feel most comfortable."

75. On or about March 20, 2022, defendant IONOV spoke, with the assistance of a translator, at a video conference hosted by the APSP concerning the Russian invasion of Ukraine; IONOV stated that anybody who supported Ukraine was also supporting Naziism and white supremacy.

Social Media Company Protest

76. On or about March 18, 2022, FSB OFFICER 3 sent electronic messages to defendant IONOV in Russian containing a social media post discussing a plan to boycott a United States social media company, asked if the post concerned IONOV's "topic," and commented that it was "kind of cool."

77. On or about March 18, 2022, defendant IONOV sent an electronic message to FSB OFFICER 3 in Russian, stating, "I'm organizing a picket protest there," in reference to a United States social media company.

78. On or about March 18, 2022, defendant IONOV sent electronic messages to defendant ROMAIN with a picture of a design for a poster protesting a United States social media company's decision to place content restrictions on posts that supported Russia's invasion of Ukraine and asking if ROMAIN could print the posters.

79. On or about March 19, 2022, defendant IONOV paid approximately $2,883.44 to purchase airline tickets for defendant ROMAIN and three other members of Black Hammer to fly from Atlanta, Georgia, to San Francisco, California, on March 22, 2022, and to return from San Francisco to Atlanta on March 24, 2022.

80. On or about March 23, 2022, defendant ROMAIN sent defendant IONOV an electronic message with a video depicting ROMAIN and other members of Black Hammer at the headquarters of a social media company in California, holding a Russian flag and posters that defendant IONOV had designed.

81. On or about March 23, 2022, defendant IONOV sent defendant ROMAIN an electronic message with a picture of a Russian news website's social media page displaying a Russian language news story about a protest by ROMAIN and Black Hammer at a social media company's headquarters in California, and defendant IONOV commented: "900,000 followers" and "1500 likes."

82. On or about March 25, 2022, defendant IONOV wrote a Russian language report for FSB OFFICER 3, noting that he had organized a group of activists from Black Hammer to travel from Atlanta to San Francisco to conduct a demonstration at the office of a U.S. social media company, had transferred $6,500 to pay for the demonstration, and that the demonstration had been widely covered in "Russian and foreign mass media."

Russian Victory Day Demonstration

83. On or about May 8, 2022, defendant IONOV sent electronic messages to defendant ROMAIN stating that ROMAIN should hold a "rally" at a U.S. media company's office in Atlanta, Georgia, in honor of Russian Victory Day, and promising to "cover this event in the entire media."

84. On or about May 8, 2022, defendant ROMAIN sent electronic messages to defendant IONOV, agreeing to hold a rally at a U.S. media company's office in Atlanta, Georgia, in honor of Russian Victory Day, and stating that IONOV had "helped greatly" with giving Black Hammer a "bigger platform to win the masses in america to revolution."

85. On or about May 8, 2022, defendant ROMAIN sent electronic messages to defendant IONOV stating that ROMAIN and others were conducting a rally at a U.S. media company's office in Atlanta, Georgia, and that he would send a video of the rally to IONOV.

86. On or about May 8, 2022, defendant IONOV sent an electronic message to defendant ROMAIN stating that IONOV would forward a video of a rally conducted by ROMAIN to the media.

87. On or about May 8, 2022, defendant ROMAIN sent electronic messages to defendant IONOV stating, "Omali could never do what I do lmao" and "Black Hammer Party is the vangaurd."

Georgia State Capitol Protest

88. On or about June 16, 2022, defendant IONOV sent electronic messages to defendant ROMAIN asking to speak over an encrypted messaging application "to discuss all the details."

89. On or about June 17, 2022, defendant ROMAIN sent defendant IONOV electronic messages containing a press release in support of an upcoming demonstration at the Georgia Capitol building, which stated, in part, that the United States "is sending Billions of OUR Tax dollars to kill the Russian people who have done us no harm," and telling IONOV, "This is the press release! Hope you like it."

90. On or about June 20, 2022, defendant IONOV sent an electronic message to defendant ROMAIN, stating that IONOV would do his "best for PR," and also stating that he had "arranged with an Irish newspaper and a website from Italy, they will publish your campaign."

91. On or about June 23, 2022, defendant ROMAIN sent an electronic message to defendant IONOV containing a link to a video of ROMAIN and other members of Black Hammer conducting a demonstration at the Georgia

Capitol building, and in the video ROMAIN stated, "I'm not ashamed to say that the Black Hammer Party has relationships with the Kremlin."

92. On or about June 26, 2022, defendant IONOV sent an electronic message to defendant ROMAIN, directing ROMAIN to put information relating to Black Hammer's demonstration at the Georgia Capitol building onto Black Hammer's website, and promising to "distribute it" and "launch it in the media tomorrow."

93. On or about June 27, 2022, defendant ROMAIN sent an electronic message to defendant IONOV, which contained a link to an article that had been published on the Black Hammer website, entitled, "Enough is ENOUGH! 'Feed our people, Not Ukkkraine' Protest at Georgia State Capitol a Victory!"

94. On or about June 28, 2022, defendant IONOV sent an electronic message to defendant ROMAIN containing a link to a website controlled by IONOV, Stop-Imperialism.org, which had re-posted an article from the Black Hammer website entitled, "Enough is ENOUGH! 'Feed our people, Not Ukkkraine' Protest at Georgia State Capitol a Victory!"

Post-Indictment Discussion

95. On or about July 29, 2022, defendant IONOV sent an electronic message to defendant POPOV containing a Russian language translation of a United States Department of Justice press release, which stated that IONOV had been charged by Indictment with working with the Russian Federal Security Service in order to orchestrate a years-long foreign malign influence campaign that used various

U.S. political groups to sow discord, spread pro-Russian propaganda, and interfere in elections within the United States, in violation of Title 18, United States Code, Section 951, and IONOV commented, "trash the phones."

All in violation of 18 U.S.C. § 371.

COUNT TWO

1. The allegations set forth in paragraphs 1 through 23 of Section A of Count One of this Superseding Indictment are realleged and incorporated by reference herein.

2. Beginning on an unknown date, but at least as early as in or around November of 2014, and continuing until on or about July 29, 2022, in the Middle District of Florida, and elsewhere, the defendants,

OMALI YESHITELA,
a/k/a "Joseph Waller,"
PENNY JOANNE HESS, and
JESSE NEVEL,
a/k/a "Jesse Nevelsky,"

aided and abetted by each other and by other persons, known and unknown to the Grand Jury, did knowingly act within the United States as an agent of a foreign government and foreign officials, to wit, the Russian Federation and officials of that

government, without prior notification to the Attorney General, as required by law, in violation of 18 U.S.C. §§ 951(a) and 2.

A TRUE BILL,

[redacted]

Foreperson

ROGER B. HANDBERG
UNITED STATES ATTORNEY

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Assistant United States Attorney
Chief, National Security Section

FOR: Daniel J. Marcet
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Demetrius D. Sumner
Trial Attorney
Public Integrity Section

No. 8:22-cr-259-WFJ-AEP

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

ALEKSANDR VIKTOROVICH IONOV
a/k/a "Alexander Ionov,"
a/k/a "Sasha"
YEGOR SERGEYEVICH POPOV,
a/k/a "Egor,"
a/k/a "Yegorka,"
ALEKSEY BORISOVICH SUKHODOLOV,
a/k/a "Borisych,"
a/k/a "AB,"
a/k/a "X2,"
OMALI YESHITELA,
a/k/a "Joseph Waller,"
PENNY JOANNE HESS,
JESSE NEVEL,
a/k/a "Jesse Nevelsky," and
AUGUSTUS C. ROMAIN, JR.,
a/k/a "Gazi Kodzo"

SUPERSEDING INDICTMENT
Violations: 18 U.S.C. § 371 and 18 U.S.C. § 951

A true bill,

[redacted]

Foreperson

Filed in open court this 13th day
of April 2023.

_____
Clerk

Bail $_____