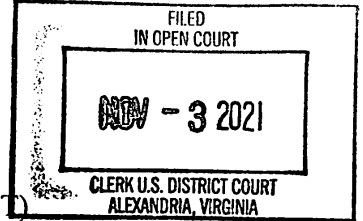


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA	:	<u>UNDER SEAL</u>
	:	
v.	:	CR No. 1:21-CR-245 (AJT)
	:	
IGOR Y. DANCHENKO,	:	COUNTS ONE – FIVE
	:	18 U.S.C. § 1001(a)(2)
Defendant.	:	False Statements
	:	

INDICTMENT

The Grand Jury Charges that:

I. Introduction and Overview

1. On or about July 31, 2016, the Federal Bureau of Investigation (“FBI”) opened an investigation known as “Crossfire Hurricane” into whether individuals associated with the Donald J. Trump presidential campaign (the “Trump Campaign”) were coordinating activities with the Russian government.

2. Beginning in or about July 2016 and continuing through December 2016, the FBI began receiving a series of reports from a former British government employee (“U.K. Person-1”) that contained derogatory information on then-candidate Donald J. Trump (“Trump”) concerning Trump’s purported ties to Russia (the “Company Reports”).

3. Earlier that year, a U.S.-based international law firm (“Law Firm-1”), acting as counsel to the Hillary Clinton Presidential campaign (the “Clinton Campaign”), had retained a U.S.-based investigative firm (“U.S. Investigative Firm-1”) to conduct research on Trump and his associates. In or about June 2016, U.S. Investigative Firm-1, in turn, retained U.K. Person-1, a