

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

**FILED**

**NOV 19 2019**

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

**CR 19 0621**

**EMC**

AHMAD ABOUAMMO;  
ALI ALZABARAH; and  
AHMED ALMUTAIRI,  
a/k/a Ahmed Aljbreen

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 951 – Acting as an Agent of a Foreign Government  
Without Notice to the Attorney General; and  
18 U.S.C. § 1519 – Destruction, Alteration, or Falsification of  
Records in Federal Investigations and Bankruptcy

A true bill.

*True Bill*

*Scott W. Wood*

Foreman

Filed in open court this 19 day of

*November 2019*

*S. Kim*

Clerk

SALLIE KIM  
United States Magistrate Judge

Bail, \$ \_\_\_\_\_

*Sub*

*Abouammo - no process*  
*Alzabarah & Almutairi -*  
*no bail arrest*  
*warrant*

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING

**OFFENSE CHARGED**

18 U.S.C. § 951 – Acting as an Agent of a Foreign Government Without Notice to the Attorney General; and 18 U.S.C. § 1519 – Destruction, Alteration, or Falsification of Records in Federal Investigations and Bankruptcy

Petty  
 Minor  
 Misdemeanor  
 Felony

PENALTY: 18 U.S.C. § 951– 10 yrs prison, \$640,000 fine, 3 yrs supervised release, \$100 special assessment; 18 U.S.C. § 1519 – 20 yrs prison, \$250,000 fine, 3 yrs supervised release, \$100 special assessment

Name of District Court, and Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

NOV 19 2019

DEFENDANT - U.S. SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
AHMAD ABUAMR

DISTRICT COURT NUMBER

CR 19 0621

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

SHOW DOCKET NO.

U.S. ATTORNEY  DEFENSE

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3:19-71824

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Colin Sampson, AUSA

**DEFENDANT**

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)  If not detained give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
  - 5)  On another conviction }  Federal  State
  - 6)  Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed?  Yes  No

If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

Arraignment  Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: \_\_\_\_\_

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

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SAN FRANCISCO DIVISION  
 CLERK U.S. DISTRICT COURT  
 NORTH DISTRICT OF CALIFORNIA

NOV 19 2019

SUSAN Y. SOONG

DEFENDANT - U.S.

▶ ALI ALZABARAH

**EMC**

DISTRICT COURT NUMBER

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PENALTY: 18 U.S.C. § 951– 10 yrs prison, \$250,000 fine, 3 yrs supervised release, \$100 special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

DEFENDANT - U.S.

AHMED ALMUTAIRI, a/k/a Ahmed Aljbreen

DISTRICT COURT NUMBER

**CR 19 0621**

**EMC**

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

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Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments:

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**NOV 19 2019**

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

1 DAVID L. ANDERSON (CABN 149604)  
United States Attorney

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA

**EMC**

9 SAN FRANCISCO DIVISION

**CR 19 0621**

11 UNITED STATES OF AMERICA,	)	CASE NO.
	)	
12 Plaintiff,	)	<u>VIOLATIONS:</u>
13 v.	)	18 U.S.C. § 951 – Acting as an Agent of a Foreign
	)	Government Without Notice to the Attorney General;
14 AHMAD ABOUAMMO;	)	and 18 U.S.C. § 1519 – Destruction, Alteration, or
15 ALI ALZABARAH; and	)	Falsification of Records in Federal Investigations and
16 AHMED ALMUTAIRI,	)	Bankruptcy
a/k/a Ahmed Aljbreen,	)	
17 Defendants.	)	SAN FRANCISCO VENUE
	)	
	)	

18  
19 INDICTMENT

20 The Grand Jury charges:

21 INTRODUCTORY ALLEGATIONS

22 At all times relevant to this Indictment, with all dates and times being approximate:

23 1. Defendant ALI ALZABARAH is a citizen of Saudi Arabia and resided in San Bruno,  
24 California, in the Northern District of California, from at least August 12, 2013, until December 3,  
25 2015.

26 2. Defendant AHMAD ABOUAMMO is a United States and Lebanese dual citizen and  
27 resided in Walnut Creek, California, in the Northern District of California, from at least November 4,  
28

1 2013, until May 22, 2015, and thereafter resided in Seattle, Washington.

2 3. Defendant AHMED ALMUTAIRI, also known as Ahmed Aljbreen (ALMUTAIRI), is  
3 a citizen of Saudi Arabia. ALMUTAIRI was present in the United States of America between  
4 approximately August 21, 2014, until approximately May 24, 2015.

5 4. Twitter, Inc. (Twitter) is a company headquartered in San Francisco, California, and  
6 owns and operates a free-access social-networking website of the same name that can be accessed at  
7 <http://www.twitter.com>. Users of Twitter, including private individuals, journalists, and public  
8 figures, create user accounts that can be used to communicate and share information instantly through  
9 “Tweets” (i.e., 140-character messages prior to 2017) to the public at large, “tweets” to a subset of  
10 Twitter users (e.g., to the public or to certain users that “follow” a user), “retweets” by one user of  
11 another user, or direct messages (DM) that are typically visible only to the sender and recipient.  
12 Certain Twitter accounts of public interest, including official accounts for government posts and  
13 celebrities, can be “verified” with a blue check mark, which is issued by Twitter.

14 5. Twitter operates its service in many languages, including English and Arabic. Many  
15 Twitter users live outside of the United States, including in Saudi Arabia. Many users are of Saudi  
16 nationality or descent, some of whom live outside of Saudi Arabia, including in the United States.

17 6. The Kingdom of Saudi Arabia (KSA) is a monarchy governed by the King and his  
18 Royal Court, which is akin to a cabinet or executive office. Members of the King’s Royal Family hold  
19 most of the country’s governmental posts.

20 7. From a time unknown to the Grand Jury but no later than May 2014, to the present,  
21 Foreign Official-1, a citizen of KSA, was the Secretary General of an organization identified here as  
22 Organization-1, founded by a member of the Saudi Royal Family (Saudi Royal Family Member-1).  
23 From a time unknown to the Grand Jury but no later than May 2015, Foreign Official-1 was the head  
24 of the private office of Saudi Royal Family Member-1.

25 8. From at least May 2014 to the present, ALMUTAIRI has controlled a Saudi social  
26 media marketing company that performed work for Organization-1 and members of the Saudi Royal  
27 Family, including Royal Family Member-1.



1           9. Title 18, United States Code, Section 2702, provides that service providers of electronic  
2 communications and remote computing services, such as Twitter, may voluntarily disclose user data to  
3 a governmental entity, if the service provider, in good faith, believes than an emergency involving  
4 danger of death or serious physical injury to any person requires disclosure without delay of data  
5 relating to the emergency. These disclosures are referred to as “emergency disclosure requests.”

6           10. ABOUAMMO was an employee of Twitter from on or about November 4, 2013, to  
7 May 22, 2015. ABOUAMMO was a Media Partnerships Manager responsible for the Middle East and  
8 North Africa (MENA) region at Twitter. As a Media Partnerships Manager, ABOUAMMO was  
9 involved in providing assistance for notable accounts, including accounts of public interest or  
10 belonging to brands, journalists, and celebrities in the MENA region, with content and Twitter  
11 strategy, and with sharing best practices.

12           11. ALZABARAH was an employee of Twitter from on or about August 12, 2013, to on or  
13 about December 4, 2015. While employed at Twitter, ALZABARAH was a Site Reliability Engineer  
14 whose responsibility was maintaining Twitter’s hardware and software to ensure uninterrupted service.

15           12. Twitter employees, including ABOUAMMO and ALZABARAH, agreed to abide by  
16 the Twitter “Playbook,” which outlines the policies Twitter employees must obey as part of their  
17 employment. Twitter’s 2013 employment contracts with ABOUAMMO and ALZABARAH  
18 prohibited them from engaging in outside employment or consulting “or any other business activity  
19 that would create a conflict of interest with the Company.” In the 2013 version of Twitter’s Employee  
20 Invention Assignment and Confidentiality Agreements, ABOUAMMO and ALZABARAH each  
21 affirmed “a relationship of confidence and trust” between themselves and Twitter “with respect to any  
22 information of a confidential or secret nature that may be disclosed to [them] by the Company or a  
23 third party that relates to the business of the Company.” The Employee Invention Assignment and  
24 Confidentiality Agreement further required ABOUAMMO and ALZABARAH to “keep and hold all  
25 such Proprietary Information in strict confidence and trust,” and defined “Proprietary Information” to  
26 include Twitter’s “customer lists and data.” In executing the agreements, ABOUAMMO and  
27 ALZABARAH affirmed that they would “not use or disclose any Proprietary Information without the

1 prior written consent of the Company” or “use[] any Company information for any other business or  
2 employment.”

3 13. Twitter’s “Playbook Acknowledgement,” which ABOUAMMO and ALZABARAH  
4 each signed during 2013, stated that each would read, understand, and abide by Twitter’s policies,  
5 including the Security Handbook, which defined user data as confidential data and prohibited sharing  
6 confidential data with third parties without approval.

7 14. Twitter’s “Gift Policy” during ABOUAMMO’s and ALZABARAH’s employment  
8 stated: “[f]or gifts exceeding \$100 in value, bring the gift to the attention of both your manager and VP  
9 of HR before returning to sender.”

10 15. ABOUAMMO and ALZABARAH had access to proprietary and confidential Twitter  
11 information, including information about Twitter users, including the user-provided names and  
12 birthdates, device identifiers, tweets, relationships, phone number, internet protocol (“IP”) addresses  
13 and session IP history, among other things.

14 16. Neither ABOUAMMO’s nor ALZABARAH’s job duties included a need to access a  
15 Twitter user’s private information, and doing so was a reportable violation of the Twitter Playbook  
16 policies regarding handling and protecting user data.

17 17. Neither ABOUAMMO nor ALZABARAH had authority from Twitter to receive,  
18 access, or produce user information pursuant to any governmental emergency disclosure request.

19 18. ABOUAMMO, ALZABARAH, and ALMUTAIRI have never provided notice to the  
20 Attorney General that they were acting as agents of a foreign government.

21 THE SCHEME

22 19. ABOUAMMO and ALZABARAH fraudulently used their positions and access to  
23 information at Twitter to provide Foreign Official-1 and others related to and working for KSA and  
24 the Saudi Royal Family with nonpublic information held in the accounts of Twitter users. Using  
25 ALMUTAIRI as an intermediary, Foreign Official-1 provided ABOUAMMO and ALZABARAH  
26 with gifts, cash payments, and promises of future employment in exchange for valuable property,  
27



1 including nonpublic information about Twitter users, that ABOUAMMO and ALZABARAH obtained  
2 fraudulently and provided to Foreign Official-1 and others.

3 20. ABOUAMMO and ALZABARAH received from Foreign Official-1 and others the  
4 names of Twitter accounts of interest to Foreign Official-1, the Saudi Arabian Royal Family, and  
5 others.

6 21. Using their access privileges as employees of Twitter, ABOUAMMO and  
7 ALZABARAH, beyond the scope of their job duties, accessed nonpublic account information of  
8 Twitter users who were of interest to Foreign Official-1, the Saudi Arabian Royal Family, and others  
9 in the government of KSA. Such nonpublic information included email addresses, telephone numbers,  
10 and dates of birth, and internet IP addresses, among other things. ABOUAMMO and ALZABARAH  
11 communicated such nonpublic account information to Foreign Official-1 and others in the government  
12 of KSA.

13 22. In exchange for accessing nonpublic account information of Twitter users, outside the  
14 scope of their job duties, and for communicating such nonpublic account information to Foreign  
15 Official-1, Foreign Official-1 rewarded ALZABARAH and ABOUAMMO including with  
16 compensation such as gifts, cash payments, and promises of future employment.

17 23. ALMUTAIRI acted as a go-between between Foreign Official-1 and ABOUAMMO  
18 and ALZABARAH, representing KSA's interests with respect to Twitter user information, and met  
19 with ABOUAMMO and ALZABARAH in person at the request of and to further the goals of Foreign  
20 Official-1 and the Saudi Royal Family.

21 24. The scheme involved the following acts, among others, which were committed or  
22 caused to be committed, in the Northern District of California and elsewhere:

- 23 a. On or about November 15, 2014, ALMUTAIRI sent an email to ABOUAMMO  
24 requesting an "urgent meeting" in San Francisco to discuss their "mutual interest." On or  
25 about November 20, 2014, ALMUTAIRI and ABOUAMMO met in person in San Francisco,  
26 California, near the Twitter headquarters.

27 //

1           b.       ABOUAMMO and Foreign Official-1 communicated by telephone and by email  
2 in late November and early December 2014 to coordinate an in-person meeting in London,  
3 United Kingdom. Foreign Official-1 traveled from Paris, France to London and met with  
4 ABOUAMMO. During that meeting on or about December 5, 2014, Foreign Official-1 gave  
5 ABOUAMMO a valuable watch worth at least \$20,000. ABOUAMMO did not report the  
6 receipt of the watch to Twitter.

7           c.       Beginning on or about December 12, 2014, ABOUAMMO began accessing  
8 without authorization through Twitter's computer system the user data of Twitter User-1,  
9 which was an account that had posted critical information about the Saudi Royal Family and  
10 Saudi Royal Family Member-1. Among other account information, ABOUAMMO accessed  
11 the email address and telephone number associated with Twitter User-1's account.  
12 ABOUAMMO accessed the account on or about December 12, 2014, January 5, 2015, January  
13 27, 2015, February 4, 2015, February 7, 2015, February 18, 2015, and February 24, 2015.

14           d.       Foreign Official-1 communicated with ABOUAMMO by telephone requesting  
15 that Twitter User-1's account be removed from Twitter and requesting private user account  
16 information. On January 17, 2015, Foreign Official-1 sent an email to ABOUAMMO's  
17 Twitter employee email account with an attachment concerning Twitter User-1 and a brief  
18 message that stated, "as we discussed in london."

19           e.       On February 5, 2015, Foreign Official-1 sent an email to ABOUAMMO's  
20 Twitter employee email account with an attachment concerning a user identified as Twitter  
21 User-2 who Foreign Official-1 asserted was impersonating a member of the Saudi Royal  
22 Family. On February 7, 2015, ABOUAMMO accessed the account information, including the  
23 email address, of Twitter User-2.

24           f.       On February 13, 2015, while ABOUAMMO worked for Twitter, Foreign  
25 Official-1 deposited \$100,000 into a recently-opened account in Lebanon in the name of  
26 ABOUAMMO's relative. ABOUAMMO had online access to this account and later received  
27 wire transfers from the account in Lebanon.

1 g. After ABOUAMMO resigned from Twitter on or about May 22, 2015, Foreign  
2 Official-1 asked ABOUAMMO to, among other things, refer requests to Twitter related to  
3 accounts of Saudi Arabian government ministers as well as complaints related to certain  
4 accounts critical of or impersonating individuals connected to the government of Saudi Arabia  
5 or the Saudi Arabian Royal Family. Between May 22, 2015, when ABOUAMMO left Twitter,  
6 and January 25, 2016, Foreign Official-1 paid ABOUAMMO at least \$200,000.

7 h. Although Twitter employees requested that ABOUAMMO direct requests from  
8 Saudi Arabian government officials directly to Twitter and not through ABOUAMMO,  
9 ABOUAMMO continued attempting to contact Twitter employees with Foreign Official-1's  
10 requests until at least March 1, 2016.

11 i. On or before February 16, 2015, and prior to ABOUAMMO's resignation from  
12 Twitter, ABOUAMMO facilitated an introduction between ALZABARAH and ALMUTAIRI.  
13 ALMUTAIRI maintained contact with ALZABARAH after ABOUAMMO resigned from  
14 Twitter.

15 j. During mid-May 2015, Foreign Official-1 directed ALZABARAH to travel  
16 from the Northern District of California to Fairfax, Virginia. On May 14, 2015, while Saudi  
17 Royal Family Member-1, Foreign Official-1, and others were visiting Washington, DC on an  
18 official delegation from the Kingdom of Saudi Arabia, ALMUTAIRI and ALZABARAH met  
19 at the residence of an employee of the Saudi Arabian Embassy in Fairfax, Virginia. Later on  
20 the same date, ALZABARAH returned to the Northern District of California.

21 k. In May 2015, after ALZABARAH returned to San Francisco, California, he  
22 began to access nonpublic account information for numerous Twitter accounts and  
23 communicated such nonpublic account information about certain Twitter users to Foreign  
24 Official-1.

25 l. From May 21, 2015, through November 18, 2015, ALZABARAH accessed  
26 without authorization through Twitter's computer system certain nonpublic account details  
27 about dozens of Twitter users, including Twitter accounts that had posted critical or  
28

1 embarrassing information about the government of Saudi Arabia and Saudi Royal Family  
2 Member-1.

3 m. On May 29, 2015, Foreign Official-1 and ALZABARAH exchanged three  
4 telephone calls and ALZABARAH accessed two Twitter accounts over the course of  
5 approximately one hour. The same day, the Kingdom of Saudi Arabia submitted emergency  
6 disclosure requests to Twitter for those same two Twitter accounts.

7 n. During July 2015, while ALZABARAH was on personal leave from Twitter,  
8 ALZABARAH traveled to Saudi Arabia. While in Saudi Arabia, ALZABARAH accessed  
9 nonpublic information of hundreds of Twitter users' accounts using his Twitter credentials,  
10 including access of nonpublic information of Twitter users on July 29, 2015, a date that  
11 ALZABARAH connected his Twitter laptop to ALMUTAIRI's company's wireless local area  
12 network in Saudi Arabia.

13 o. ALZABARAH accessed Twitter User-1's account information on or about May  
14 21, 2015, June 14, 2015, July 5, 2015, August 6, 2015, August 7, 2015, August 20, 2015,  
15 September 27, 2015, September 28, 2015, and September 30, 2015. On September 28, 2015,  
16 ALZABARAH repeatedly accessed Twitter User-1's account information, the same date the  
17 account holder reported that his account had been hacked or compromised.

18 p. On December 2, 2015, Twitter management confronted ALZABARAH about  
19 his unauthorized access of Twitter users' accounts and placed him on administrative leave.  
20 ALZABARAH attempted to contact ALMUTAIRI, and then contacted Foreign Official-1, who  
21 contacted an employee of the Saudi Arabian Consulate in Los Angeles, California to  
22 coordinate ALZABARAH's departure from the United States.

23 q. On December 3, 2015, ALZABARAH flew to Saudi Arabia and submitted a  
24 resignation letter to Twitter by email.

25 r. By no later than January 2016, ALZABARAH had obtained employment in  
26 Saudi Arabia with Organization-1 and was in email contact with ALMUTAIRI, Foreign  
27 Official-1 and others regarding social media influence projects on behalf of KSA, Foreign  
28

1 Official-1, and the Saudi Royal Family.

2 COUNT ONE: (18 U.S.C. § 951 – Acting as an Agent of a Foreign Government Without Notice to  
3 the Attorney General)

4 25. Paragraphs 1 through 24 are realleged as if fully set forth herein.

5 26. From on or about December 12, 2014, and continuing until on or about March 1, 2016,  
6 in the Northern District of California and elsewhere, the defendant,

7 AHMAD ABOUAMMO,

8 did knowingly, without notifying the Attorney General as required by law, act as an agent of a foreign  
9 principal, to wit, the government of KSA and the Saudi Royal Family.

10 All in violation of Title 18, United States Code, Section 951.

11 COUNT TWO: (18 U.S.C. § 951 – Acting as an Agent of a Foreign Government Without Notice to  
12 the Attorney General)

13 27. Paragraphs 1 through 24 are realleged as if fully set forth herein.

14 28. From at least on or about November 20, 2014, and continuing until at least on or about  
15 May 24, 2015, in the Northern District of California and elsewhere, the defendant,

16 AHMED ALMUTAIRI,

17 did knowingly, without notifying the Attorney General as required by law, act as an agent of a foreign  
18 principal, to wit, the government of KSA and the Saudi Royal Family.

19 All in violation of Title 18, United States Code, Section 951.

20 COUNT THREE: (18 U.S.C. § 951 – Acting as an Agent of a Foreign Government Without  
21 Notice to the Attorney General)

22 29. Paragraphs 1 through 24 are realleged as if fully set forth herein.

23 30. From on or about May 21, 2015, and continuing until on or about December 3, 2015, in  
24 the Northern District of California and elsewhere, the defendant,

25 ALI ALZABARAH,

26 did knowingly, without notifying the Attorney General as required by law, act as an agent of a foreign  
27 principal, to wit, the government of KSA and the Saudi Royal Family.

All in violation of Title 18, United States Code, Section 951.

COUNT FOUR: (18 U.S.C. § 1519 – Falsification of Records to Obstruct Investigation)

31. Paragraphs 1 through 24 are realleged as if fully set forth herein.

32. On October 20, 2018, in the Northern District of California and elsewhere, the defendant,

AHMAD ABOUAMMO,

unlawfully, intentionally, and knowingly did alter, destroy, mutilate, conceal, and falsify a record or document, namely creating and providing by email to the Federal Bureau of Investigation a fabricated, false, and backdated invoice for \$100,000 for consulting services to Foreign Official-1, from CYRCL, LLC, defendant's sole proprietorship, with the intent to impede, obstruct and influence an actual and contemplated investigation and the proper administration of a matter within the jurisdiction of a department and agency of the United States, namely the Federal Bureau of Investigation.

All in violation of Title 18, United States Code, Section 1519.

SENTENCING ALLEGATION:

33. With respect to Count One of the Indictment, for the purposes of determining the maximum alternative fine, pursuant to Title 18, United States Code, Section 3571(d), the defendant,


AHMAD ABOUAMMO,

derived gross gains of approximately \$320,000.

DATED:

11/19/19

A TRUE BILL.

  
FOREPERSON

DAVID L. ANDERSON  
United States Attorney

  
COLIN SAMPSON

Assistant United States Attorney  
JASON B. A. McCULLOUGH  
Trial Attorney, National Security Division