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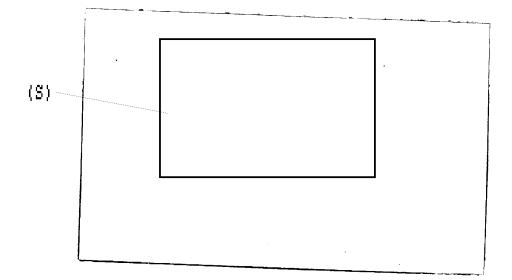


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Approved:

MICHAEL FARBIARZ/GLEN KOPP/JASON SMITH Assistant United States Attorneys

KATHLEEN KEDIAN
Trial Attorney, Counterespionage Section,

National Security Division, Department of Justice

Before: HONORABLE RONALD L. ELLIS

United States Magistrate Judge Southern District of New York .

UNITED STATES OF AMERICA

SEALED COMPLAINT

-v.-

Violation of 18 U.S.C. § 371

ANNA CHAPMAN, and MIKHAIL SEMENKO,

COUNTY OF OFFENSE:

NEW YORK

Defendants.

SOUTHERN DISTRICT OF NEW YORK, ss.:

AMIT KACHHIA-PATEL, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE

Conspiracy to Act as Unregistered Agents of a Foreign Government

- 1. From in or about the 1990s, up to and including the present, in the Southern District of New York and elsewhere, ANNA CHAPMAN and MIKHAIL SEMENKO, the defendants, and others known and unknown, unlawfully, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 951 of Title 18, United States Code.
- 2. It was a part and an object of the conspiracy that ANNA CHAPMAN and MIKHAIL SEMENKO, the defendants, and others known and unknown, unlawfully, willfully and knowingly, would and did act in the United States as agents of a foreign government, specifically the Russian Federation, without prior notification

to the Attorney General, as required by law, in violation of Title 18, United States Code, Section 951.

Overt Acts

- 3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:
- a. On or about June 26, 2010, ANNA CHAPMAN, the defendant, met with an individual purporting to be a Russian Government official in Manhattan, New York, at which she (CHAPMAN) received a fraudulent passport.
- b. On or about June 26, 2010, MIKHAIL SEMENKO, the defendant, met with an individual purporting to be a Russian Government official in Washington, D.C.

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

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I have been a Special Agent with the FBI for approximately five years. Currently, I am assigned to the Counterintelligence Division within the New York Field Office of the FBI. The focus of my counterintelligence efforts has been on the foreign intelligence activities of the Russian Federation. I have learned the facts contained in this Complaint from, among other sources, my personal participation in this investigation, my discussions with other law-enforcement agents, searches that I have conducted, surveillance that I have conducted, and my review of documents, video and audio recordings, and other evidentiary materials. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of this investigation. Further, any statements related herein are related in substance and in part only.

I. THE "ILLEGALS" PROGRAM

5. The FBI has conducted a multi-year investigation of a network of United States-based agents of the foreign

intelligence organ of the Russian Federation (the "SVR").¹ The targets of the FBI's investigation include covert SVR agents who assume false identities, and who are living in the United States on long-term, "deep-cover" assignments. These Russian secret agents work to hide all connections between themselves and Russia, even as they act at the direction and under the control of the SVR; these secret agents are typically called "illegals." As set forth in more detail in the attached Complaint, see Attachment A, which is incorporated by reference herein, illegals receive extensive training by the SVR before being assigned to a foreign country under a false identity to operate on behalf of Russia. See Complaint ¶¶ 8-9 (describing illegals' training, and use of false identities).

- 6. The SVR also operates a subset of illegals who perform the same work as illegals, but operate in foreign countries under their true names. This subset of illegals is generally trained in roughly the same trade-craft as the other illegals (including agent-to-agent communications, invisible writing, and the use of a cover profession), but their training is typically shorter. In addition, these illegals are not generally paired with another illegal.
- 7. The FBI's investigation has revealed that a network of illegals (the "Illegals") is now living and operating in the United States in the service of one primary, long-term goal: to become sufficiently "Americanized" such that they can gather information about the United States for Russia, and can successfully recruit sources who are in, or are able to infiltrate, United States policy-making circles.
- 8. The SVR spelled out the purpose of the Illegals' presence in America in a 2009 message to two co-conspirators who are named as defendants in the attached Complaint. That message, which was sent by Moscow Center, has been decrypted by the FBI and reads, in part, as follows:

You were sent to USA for long-term service trip. Your education, bank accounts, car, house etc. — all these serve one goal: fulfill your main mission, i.e. to search and develop ties in policymaking circles in US and send intels [intelligence reports] to C[enter].

The SVR headquarters in Moscow is known as "Moscow Center" or "Center."

- 9. Based on the facts set forth below, I believe that ANNA CHAPMAN and MIKHAIL SEMENKO, the defendants, are part of the subset of Illegals who, as described above in Paragraph 7, operate under their true names.
- 10. I am aware that federal law requires individuals who are acting as agents for foreign governments to notify the Attorney General of the United States. The Department of Justice ("DOJ") maintains files of all individuals who have registered as agents of foreign governments. A recently-conducted review of DOJ files indicates that ANNA CHAPMAN and MIKHAIL SEMENKO, the defendants, have never notified the DOJ that he or she is an agent of the Russian Federation.

II. MEANS AND METHODS OF THE CONSPIRACY: COVERT COMMUNICATIONS BY PRIVATE WIRELESS NETWORKS

- 11. To further the aims of the conspiracy, Moscow Center has arranged for the defendants clandestinely to communicate with the Russian Federation. In particular, the conspirators have used a number of methods of secret communications. See Complaint III.A. As set forth below, these include covert communications by means of private wireless networks.
- 12. In general terms, covert communication via a private wireless network is a form of electronic communication through paired laptop computers. Such covert communication utilizes temporary wireless networks that spring up between two computers and can be used to transmit data between them. The way this system typically works is as follows: a laptop computer ("LAPTOP A") is pre-configured to create its own private wireless local area network. This wireless network is programmed to only communicate with another specific laptop ("LAPTOP B"), based on LAPTOP B's Media Access Control ("MAC") address.² Once LAPTOP A transmits the signal to establish its own private wireless network, it will be "joined" by LAPTOP B when LAPTOP B comes within a certain physical distance of LAPTOP A. Once the two laptop computers are both on the private wireless network, they can communicate with each other by

A MAC address is a unique identifying number assigned by a manufacturer to electronic communications devices, such as laptop computers and Wi-Fi network cards. All computers that access the internet through a wireless network do so by publicly broadcasting their MAC addresses via radio transmission in order to locate a device connected to the internet.

exchanging data. The data can be encrypted so that it can only be read with the aid of specialized decryption software, similar to that used to decrypt messages hidden through steganography, as described in the Complaint attached hereto.

1. ANNA CHAPMAN'S USE OF PRIVATE WIRELESS NETWORKS

- 13. Since in or about January 2010, law-enforcement agents, acting pursuant to judicial orders, conducted surveillance of ANNA CHAPMAN, the defendant, at various locations in New York City. On approximately ten Wednesdays between January 2010 and June 2010, law-enforcement agents observed CHAPMAN in the physical vicinity of an individual ("Russian Government Official #1") who has, on multiple occasions, been observed entering the Russian Mission to the United Nations in Manhattan. Based on my training, experience, and participation in this investigation, I believe that on each of these ten occasions, CHAPMAN and Russian Government Official #1 covertly exchanged electronic communications via a private wireless network, as described above.
- 14. Set forth below are certain examples of Wednesdays on which ANNA CHAPMAN, the defendant, and Russian Government Official #1, were in the vicinity of each other, in order to exchange electronic messages covertly.
 - On January 20, 2010, law-enforcement agents, acting pursuant to judicial orders, performed video surveillance on a coffee shop located near the intersection of 47th Street and 8th Avenue in Manhattan, New York (the "Coffee Shop"). CHAPMAN was seated near the windów of the Coffee Shop and had with her a bag (the "Tote Bag"). After approximately ten minutes, I observed a minivan pass by the window of the Coffee Shop. Based on my conversations with another law-enforcement agent, I know that Russian Government Official #1 has been observed driving the minivan, recognized by its license plate, on a number of occasions subsequent to January 20, 2010. As part of the surveillance operation, law-enforcement agents utilized a commercially available tool that can detect the presence of wireless networks. The agents detected the presence of a particular network (the "AD HOC NETWORK") with two associated MAC

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addresses ("MAC ADDRESS A" and "MAC ADDRESS B"). Based on my training, experience, and participation in this investigation, I believe that on January 20, CHAPMAN (from the Coffee Shop) and Russian Government Official #1 (from the minivan) used their laptop computers (which bore "MAC ADDRESS A" and "MAC ADDRESS B") to create the AD HOC NETWORK and to use it to communicate with one another.

- On March 17, 2010, law-enforcement agents, acting pursuant to judicial orders, performed video surveillance on a book store located in the vicinity of Greenwich and Warren Streets in Manhattan (the "Book Store"). CHAPMAN was inside the Book Store. At the same time, Russian Government Official #1 was across the street from the Book Store, carrying a briefcase. I observed CHAPMAN pull a laptop out of the Tote Bag. CHAPMAN stayed in the Book Store for approximately thirty minutes; Russian Government Official #1 was in the vicinity of the Book Store (but outside) for approximately twenty of those thirty minutes. As part of the surveillance operation, law-enforcement agents utilized a commercially available tool that can detect the presence of wireless networks. Lawenforcement agents were able to detect a particular MAC address - MAC ADDRESS A - at the time that CHAPMAN was observed powering on her laptop computer; law-enforcement agents were also able to determine that the electronic device associated with MAC ADDRESS A created the AD HOC NETWORK. Approximately three minutes after the creation of the AD HOC NETWORK, another electronic device with MAC ADDRESS B was detected joining the AD HOC NETWORK.
- C. On April 7, 2010, law-enforcement agents, acting pursuant to judicial orders, performed surveillance on Russian Government Official #1 starting from the point that he left his office in mid-town Manhattan. According to a law-enforcement agent who was

performing surveillance on Russian Government Official #1, it appeared that Russian Government Official #1 noticed the presence of the surveillance team and returned to his office. As part of the surveillance operation, law-enforcement agents utilized a commercially available tool that can detect the presence of wireless networks. On this occasion; the agents detected the presence of MAC ADDRESS A, but not MAC ADDRESS B. Based on my training, experience, and participation in this investigation, I believe that on April 7, Russian Government Official #1 set out to communicate covertly with CHAPMAN, who was using a laptop computer that bore MAC ADDRESS A - but that he (Russian Government Official #1) aborted his efforts to communicate with CHAPMAN because he detected the FBI's surveillance of him.

d. On April 21, 2010, May 5, 2010, June 9, 2010, and June 16, 2010, law-enforcement agents, acting pursuant to judicial orders, observed CHAPMAN in the vicinity of Russian Government Official #1. On each of these four occasions, law-enforcement agents discerned the presence of MAC ADDRESS A and MAC ADDRESS B using the commercially-available tool described above, and were able to determine that after the electronic devices associated with MAC ADDRESS A and MAC ADDRESS B joined the AD HOC NETWORK, the electronic devices transferred data between each other.

B. MIKHAIL SEMENKO'S USE OF PRIVATE WIRELESS NETWORKS

15. On or about June 5, 2010, law-enforcement agents performed surveillance on MIKHAIL SEMENKO, the defendant, at a restaurant in Washington, D.C. (the "Restaurant"). According to an FBI special agent who was present for the surveillance ("Special Agent-1"), at approximately 11:00 a.m., SEMENKO entered the Restaurant carrying a bag. Approximately ten minutes later, a law-enforcement agent observed a car with a diplomatic license plate for Russia enter the Restaurant parking lot, drive around the parking lot, and then park (the "Car").

The individual seen driving the Car has been identified as a Russian government official ("Russian Government Official #2). The Car remained in the parking lot for approximately twenty minutes and then drove away. Within a few minutes, SEMENKO left the Restaurant.

16. According to Special Agent-1, on June 5, 2010, during the surveillance of MIKHAIL SEMENKO, the defendant, lawenforcement agents, pursuant to judicial order, utilized the same commercially available tool that can detect the presence of wireless networks as described above, that was used during the surveillance operations on ANNA CHAPMAN, the defendant. The device was able to detect the presence of two MAC addresses on an ad hoc network during the time that SEMENKO and Russian Government Official #2 were in the vicinity of each other inside the Restaurant and its parking lot, respectively. Therefore, based on my training, experience, and participation in this investigation, and as further informed by SEMENKO's statements to an undercover agent described below, I believe that SEMENKO was trying to utilize the private wireless network system to communicate with Russian Government Official #2.

III. ANNA CHAPMAN'S JUNE 26, 2010 MEETING WITH AN UNDERCOVER AGENT POSING AS A RUSSIAN GOVERNMENT OFFICIAL

17. As set forth in greater detail below, on June 26, 2010, an FBI undercover agent ("UC-1"), purporting to be a Russian consulate employee, arranged a meeting with ANNA CHAPMAN, the defendant, in Manhattan, New York, after telling her that it was urgent to meet with her in order to provide something to her. During this meeting, among other things: (a) CHAPMAN and UC-1 discussed her "Wednesday" covert laptop communication sessions, see supra II.A; (b) CHAPMAN provided UC-1 with her laptop computer, which apparently was having

Furthermore, Russian Government Official #2 was observed, in 2004, engaging in a brush-pass with a co-conspirator named as a defendant in the Complaint at a train station in Forest Hills, New York. See Complaint $\P \ 53-54$.

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Law-enforcement officers have observed the person who appears to be Russian Government Official #2 entering and leaving the Russian Mission. In addition, law-enforcement officials have obtained from the United States Department of State the visa application of an individual identified as a "second secretary" of the Russian Mission. The photograph of the applicant in that visa application is a photograph of Russian Government Official #2

technical difficulties, so that it could either be fixed, or sent back to Moscow; and (c) UC-1 provided CHAPMAN with a passport bearing a fictitious name, which UC-1 instructed CHAPMAN to provide to another illegal, who was based in New York and who, unlike CHAPMAN, was operating in a false name.

- 18. On June 26, 2010, at approximately 11:00 a.m., UC-1 placed a consensually-recorded telephone call to ANNA CHAPMAN, the defendant. In that call, which was conducted in Russian, UC-1 stated that he needed to meet with CHAPMAN that day, in order to provide her with something.
- 19. Later that day, at approximately 12:30 p.m., ANNA CHAPMAN, the defendant, placed a telephone call to UC-1, which was intercepted pursuant to a judicial order. In that call, which also was conducted in Russian, CHAPMAN stated that it would be difficult to meet that day, and asked whether it would be possible to meet the next day instead. UC-1 stated that the meeting was urgent, but agreed to meet with CHAPMAN the following morning. At approximately 1:00 p.m., CHAPMAN again placed a call to UC-1, which call was also intercepted pursuant to a judicial order. In this third call, which was also conducted in Russian, CHAPMAN stated that she would return to New York from Connecticut for a meeting with UC-1 and would call UC-1 at approximately 4:00 p.m. UC-1 directed CHAPMAN to meet at a particular coffee shop in downtown Manhattan, New York.
- 20. At approximately 4:30 p.m., UC-1 met with ANNA CHAPMAN, the defendant, at the previously agreed upon location in Manhattan. This meeting was recorded by a hidden recording device worn by UC-1. At the outset of this meeting, UC-1 identified himself as the person who had spoken with CHAPMAN on the phone earlier in the day. At the beginning of the meeting, UC-1 and CHAPMAN spoke to each other in Russian, but then UC-1 suggested that they speak in English so as to draw less attention to themselves. Based on my review of the recording of the meeting, I have learned the following:
 - a. UC-1 asked, "Tell me how is everything? How are you doing?" CHAPMAN replied, "Everything is cool apart from connection." Based on my training, experience, and participation in this investigation, I believe that this is a reference,

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Certain of the recorded conversations referred to in this Complaint were conducted in Russian. The quotations and descriptions of these conversations are based on preliminary translations of the conversations, and are subject to revision.

to the technical difficulties with the laptop-tolaptop covert communications between CHAPMAN and Russian Government Official #1.

- b. CHAPMAN stated, "I just need to get some more information about you before I can talk." UC-1 replied, "I work in the same department as you, but I work here in the consulate. Okay. My name is Roman. My name is Roman, I work in the consulate."
- C. UC-1 stated, "There is a situation that I need your help with tomorrow, which is why it's not like regular email contact or website contact and this could not wait until your Wednesdays, you 'know." UC-1 then asked, "When was the last Wednesday that you . . . So this Wednesday, now you will do it?" CHAPMAN replied "no," but stated that it would be "next Wednesday."
- d. UC-1 stated, "I know you are having some problems with the connections. I am not the technical guy I don't know how to fix it, but if you tell me, I can pass it up. But, basically I know you are going back to Moscow in two weeks. . . . So, ah when you go back they will sit down with you and talk officially about your work, your performance, ah-but, for now I just wanted to see how you are doing, how everything is going and then I have a task for you to do tomorrow."
- e. UC-1 then explained, "[T]his is not like, this is not like the Wednesdays with the notebooks, this is different it is, it is the next step. You are ready for the next step. Okay?" CHAPMAN replied, "Ok."
- f. UC-1 stated, "This had to get done, okay, because I will explain. There is a person here who is just like you okay. But, unlike you, this person is not here under her real name. . . So she was in the country and to do that we have to give her new documents. Understand? So, I have the documents for you to give to her tomorrow morning. Once you do that, once you give her the document that's it." CHAPMAN replied, "Okay." UC-1 stated, "So, I have it. I can show you, but this is what I mean by next step because this is not laptop to laptop, this is person to person.

She is just like you OK." CHAPMAN then asked, "Is she in New York?" UC-1 then asked, "Are you ready for this step?" CHAPMAN replied, "Shit, of course."

- UC-1 asked, "So, tell me the notebooks? Are you g. still having a problem with the notebook? With the connection?" CHAPMAN replied, "Yes. I thought you were flying back so it is alright." UC-1 stated, "Do you want me . . . well [sic] can give it to consulate if you want them to look at it or you can wait and take it home yourself to Moscow." CHAPMAN stated, "It would be more convenient if I gave you it." Later, in the course of the meeting, CHAPMAN provided the laptop computer to UC-1 (hereafter the "Laptop"). Based on my training, experience, and participation in this investigation, I believe that the Laptop is the computer, which was beset by technical difficulties and which was used for laptop-to-laptop covert communications between CHAPMAN and Russian Government Official #1.
- h. UC-1 described to CHAPMAN where she would need to go the next day at 11:00 a.m. to meet with the person described above in subparagraph (f). UC-1 explained that the purpose of the meeting would be for CHAPMAN to convey a passport bearing a fictitious name (the "Fraudulent Passport"). UC-1 provided the Fraudulent Passport to CHAPMAN during the meeting. As he did so, UC-1 stated: "[s]o this is the passport. This is the person, this is not her real name but you can call her this name if you wish. Okay, this is what she looks like. So, she will come to you, give her the passport and you are done."
- i. UC-1 then stated, "When you are done, I need you to come back here to this location . . . so that I know that everything is okay. . . . You can't see from here, but when I walk out there is a city map Go to the map after you are done. Come up to the map and, I will give you the thing, all you do is [place a postal] stamp, all you do is put it on the side of the map like you are looking at the map Just come to the map and put it on the side and then I will check it and I will know that everything is okay."

- j. UC-1 then described how she (CHAPMAN) would recognize the person ("I-1") to whom she (CHAPMAN) was to give the Fraudulent Passport. I-1, UC-1 explained, "will come to you so, so the way that she will know you is, you just hold this in your hand like this. Just hold it in your hand and she will come to you." At the time that UC-1 said this to CHAPMAN, he (UC-1) provided her (CHAPMAN) with a magazine to hold, so that I-1 would recognize her (CHAPMAN) at the meeting where the Fraudulent Passport was to be handed over.
- UC-1 then stated that I-1 "will tell you . . k. 'excuse me, but haven't we met in California last summer?' And you will say to her, 'No, I think it was the Hamptons." CHAPMAN asked, "The Hamptons?" UC-1 stated, "The Hamptons and that is it. That is how you know and you just exchange, just give her the document [that is, the Fraudulent Passport] and then after this I need you to come back, put the stamp and then after this it is all normal schedule, okay, you can go back to Wednesday." UC-1 then asked CHAPMAN to repeat all of his instructions to her, which CHAPMAN substantially did. Specifically, CHAPMAN confirmed, "Okay, tomorrow at 11, I am going to be sitting at one of the benches, she is going to ask me if she saw me in California. I am going to say no, it was in the Hamptons. I will take the documents, tell her to sign. I will hold the journal, this is how she will recognize me and I got back and put the [postal] stamp."
- 1. CHAPMAN -asked, "You're positive no one is watching?" UC-1 replied, "You know how long it took me to get here? Three hours. So here I am comfortable. But when you go, you know, be careful." Based on my training, experience, and participation in this investigation, I believe that CHAPMAN understood "three hours" as a reference to the time that UC-1 had spent conducting circuitous "surveillance detection routes," to insure that he was not being followed.
- m. Toward the end of the meeting, UC-1 stated, "[Y]our colleagues back in Moscow, they know you

are doing a good job and they will tell you this when they see you. So keep it up."

- 21. At approximately 6:00 p.m., about an hour after the meeting described above in Paragraph 21 concluded, law enforcement agents conducting surveillance of ANNA CHAPMAN, the defendant, observed the following: CHAPMAN entered a CVS Pharmacy store located in Brooklyn, New York. Thereafter, CHAPMAN entered a Verizon store in Brooklyn, New York. CHAPMAN then left the Verizon store, entered a Rite Aid Pharmacy, and then returned to the Verizon store. After CHAPMAN left the Verizon store for the second time, law enforcement agents observed that she threw a Verizon bag (the "Verizon Bag") into the garbage. After CHAPMAN left the vicinity, law enforcement agents retrieved the Verizon Bag that CHAPMAN had just discarded. Inside the bag, the agents found the following items, among others:
 - a. The Verizon Bag contained a customer agreement for the purchase of a Motorola cellphone. The customer agreement was in the name of "Irine Kutsov," and indicated a customer address of "99 Fake Street."
 - b. The Verizon Bag also contained the packaging for a "Tracfone" calling card, and for a Verizon calling card. Based on my training and experience, and my involvement in this investigation, I know that both of these calling cards may be used to make international calls.
 - c. The Verizon Bag also contained an unopened charging device for the Motorola cellphone indicated on the customer agreement.
- 22. Based on the foregoing observations by the surveillance agents, as well as my training, experience, and participation in this investigation, I believe that ANNA CHAPMAN, the defendant, following her meeting with UC-1, entered a series of stores to avoid being followed or surveilled. On these same bases, I believe that her use of a false name and address in the customer agreement form, as well as her throwing of the cellphone charger, suggest that CHAPMAN was seeking to use the Motorola cellphone only temporarily so as to avoid detection of her conversations.
- $23\,\cdot\,$ On June 27, 2010, ANNA CHAPMAN, the defendant, did not appear at the designated time at the location agreed upon in the meeting with UC-1.

VI. MIKHAIL SEMENKO'S JUNE 26, 2010 MEETING WITH AN UNDERCOVER AGENT POSING AS A REPRESENTATIVE OF THE RUSSIAN GOVERNMENT

- 24. On or about June 26, 2010, an FBI undercover agent ("UC-2"), who was posing as an agent of the Russian Government, placed a call to MIKHAIL SEMENKO, the defendant, at a cellular telephone number used by SEMENKO. That call was recorded pursuant to judicial authorization. At the beginning of the conversation, UC-2 asked SEMENKO, "could we have met in Beijing in 2004?" SEMENKO responded, "Yes, we might have, but I believe it was in Harbin." UC-2 and SEMENKO then arranged to meet at approximately 7:30 p.m. near the intersection of 10th Street N.W., and H Street N.W. in Washington, D.C. (The "Washington Street Corner"). During the conversation, which was recorded by a hidden device, UC-2 asked SEMENKO whether SEMENKO remembered "the sign," and SEMENKO responded that he did. Based on my training, experience, and participation in this investigation, I believe that SEMENKO was affirming that he remembered what object he was supposed to carry during any inperson meeting with an SVR operative in order to allow the operative to identify SEMENKO.
- 25. At approximately 7:28 p.m. on June 26, 2010, UC-2 saw MIKHAIL SEMENKO, the defendant, at the Washington Street Corner. SEMENKO stood at the Washington Street Corner for approximately two minutes before UC- $\tilde{2}$ walked up to him. The meeting between UC-2 and SEMENKO was recorded by a hidden recording device worn by UC-2. After UC-2 approached SEMENKO, UC-2 repeated the phrase that he had used during the telephone conversation earlier that day, asking SEMENKO whether the two men could have met in Beijing during 2004. SEMENKO again responded that it was possible, but that the meeting had been in Harbin. UC-2 and SEMENKO then exchanged greetings in Russian and walked together to a nearby park (the "Washington Park"). In the Washington Park, UC-2 and SEMENKO sat together on a park bench where they talked to one another for approximately 30 minutes. Among other things, UC-2 and SEMENKO had the following discussions:
 - a. UC-2 told SEMENKO that he wanted to discuss SEMENKO's attempted communication at the Restaurant on June 5, 2010. UC-2 told SEMENKO that UC-2 believed the communication attempt had not been successful, to which SEMENKO responded "I got mine." SEMENKO further explained that equipment he had been using for the communication had automatically turned itself off at the end

of the communications session, which SEMENKO stated was a sign that the communication was successful. SEMENKO further explained that, when he turned the equipment on again after it had shut down, he "saw the stuff [he] received," and also said that when the communication went through he was "like . . totally happy."

- b. UC-2 asked SEMENKO whether he had seen "our officer" during the June 5, 2010 attempted communications. SEMENKO responded, "no, I am not supposed to look, though I'm not supposed to be looking out."
- C. UC-2 asked SEMENKO to describe the steps SEMENKO took during the June 5, 2010 attempted communication. SEMENKO explained that he had positioned his communications equipment so that it was "open" and so that it was facing "the right direction." SEMENKO further stated that, prior to the communication, he restored his equipment to "default settings," which SEMENKO explained was necessary if SEMENKO had "used [the equipment for [his office]." In describing how he prepared data for transmission via the ad hoc network, SEMENKO stated, "I just create the file, Zip it . . ."
- d. UC-2 asked SEMENKO who had trained SEMENKO to use his communications equipment as described above, and SEMENKO responded, "the Center guys, the Center guys." Later in the conversation, UC-2 asked SEMENKO how much time SEMENKO had spent in the "Center," and SEMENKO responded, "ahh . . . a week." When UC-2 indicated that he was surprised that SEMENKO could have been trained on his communications equipment in only one week, SEMENKO responded that he had previously received an additional two weeks of training.
- e. SEMENKO and UC-2 also discussed the safety of SEMENKO's communications equipment. Specifically, UC-2 told SEMENKO that, "as far as the computer goes, [he should] be careful with it, [because] it is very

sensitive." SEMENKO responded that he knew the equipment was sensitive, and that he was being careful with it. In response to a question from UC-2 about how he was keeping his communications equipment safe, SEMENKO responded that he did not have anything that looked suspicious, and that he (SEMENKO) was the only person using the communications equipment. SEMENKO further stated that the one other thing he had was "a book, basically like other books." Based on my training, experience, and participation in this investigation, I believe that SEMENKO was saying that there was nothing suspicious about the outward appearance of his communications equipment, and that the only other item he possessed for that communication was a book, which was largely indistinguishable from other books.

- f. UC-2 asked SEMENKO what he would do with his communications equipment if "something goes down." SEMENKO responded that he would erase the hard drive of the communications equipment. Based on my training, experience, and participation in this investigation, I believe that SEMENKO was saying that, if he were subjected to scrutiny by law-enforcement or intelligence personnel, he would erase the hard drive of the communications equipment.
- UC-2 asked SEMENKO about the pre-arranged meeting places that SEMENKO had within the United States for use when SEMENKO received a particular signal. SEMENKO responded that his only meeting place for such occasions was the Russian Consulate in New York City. SEMENKO further explained that, although the Washington Street Corner had been proposed as a potential meeting site, it had never been approved presumably by Center.
- 26. After the discussions described above, UC-2 handed SEMENKO a folded newspaper inside which an envelope containing \$5,000 in cash was concealed. UC-2 told SEMENKO, "There is an envelope in there; there is money in it. The money has to go to a park in Arlington tomorrow. It has to be there between 11:00 a.m. and 11:30 a.m." SEMENKO then asked UC-2 for

a description of the location where the money was to be delivered, and UC-2 gave SEMENKO a map which showed the location, including information about a particular spot underneath a bridge where SEMENKO was to deliver and hide the money (the "Drop Site"). After SEMENKO indicated that he had memorized the information from the map, he gave it back to UC-2 to be destroyed.

- 27. At the end of the June 26, 2010 meeting between UC-2 and SEMENKO, UC-2 asked SEMENKO whether he had any last concerns. SEMENKO responded that he wanted UC-2 to "figure out" the problem with the communications via the private wireless network. The meeting concluded with SEMENKO asking UC-2 whether he was now going to report the communications problem to "them."
- . 28. On or about June 26, 2010, the FBI installed video surveillance cameras in the vicinity of the Drop Site. The footage recorded by those cameras reflects the following:
 - a. At approximately 11:00 a.m., MIKHAIL SEMENKO, the defendant, approached the area of the Drop Site by crossing over the bridge underneath which the Drop Site is located. SEMENKO's face is clearly visible in the footage from one of the cameras, and SEMENKO can also be seen carrying a white bag.
 - b. Video footage recorded at approximately 11:06 a.m. shows SEMENKO removing from the white bag the newspaper concealing an envelope containing \$5,000 that UC-2 had given to SEMENKO the previous day. That footage also shows SEMENKO placing the newspaper in the Drop Site.
 - c. At approximately 11:07 a.m., SEMENKO is seen for the last time on the video footage from the vicinity of the Drop Site. The footage does not reflect SEMENKO leaving the area by crossing back over the bridge on which he had originally arrived.
- 29. At approximately 11:50 a.m., FBI agents searching the Drop Site recovered the newspaper that MIKHAIL SEMENKO, the defendant, had placed there, and which UC-2 had given to SEMENKO the previous day. When the agents opened the newspaper, they found it to contain the envelope containing \$5,000 that had been inside the newspaper when UC-2 had given it to SEMENKO the previous day.

WHEREFORE, deponent prays that a warrant be issued for the arrests of ANNA CHAPMAN and MIKHAIL SEMENKO, the defendants, and that they be arrested and imprisoned, or bailed, as the case may be.

AMIT KACHHIA-PATEL

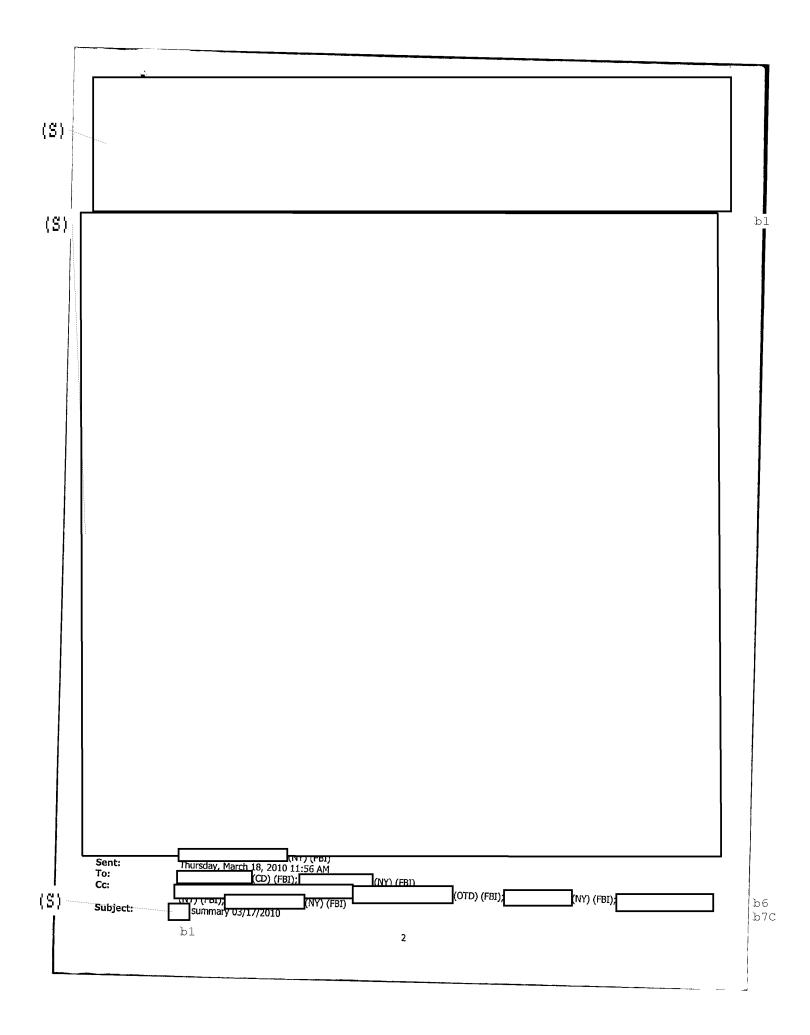
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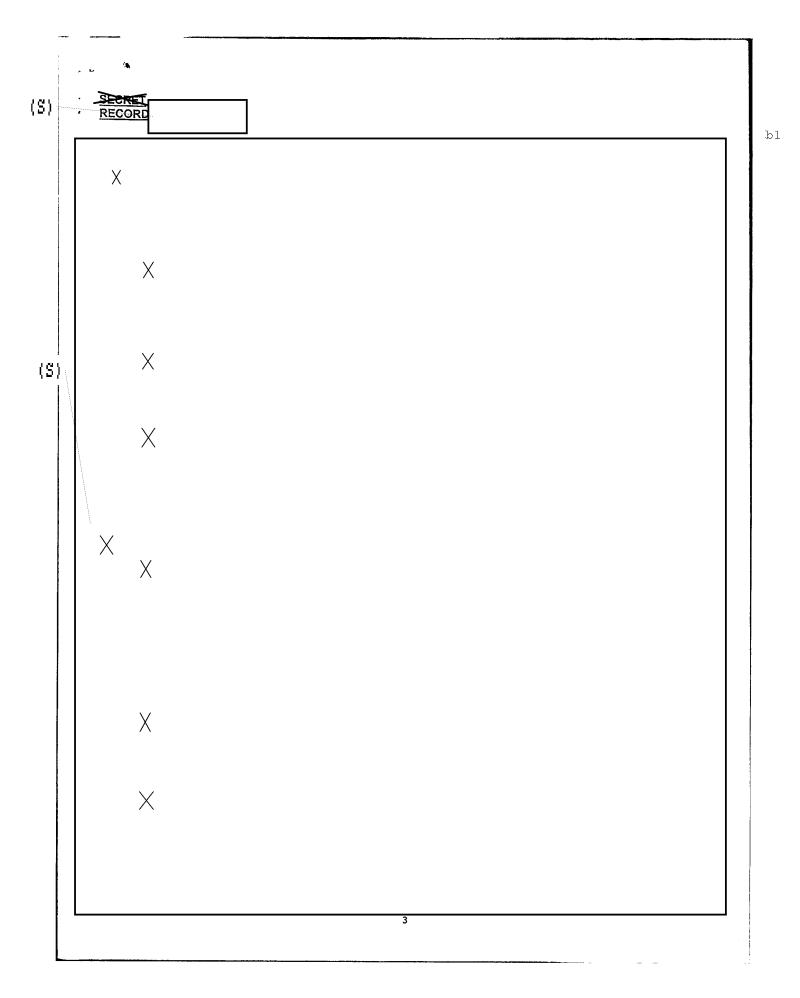
Federal Bureau of Investigation

Sworn to before me this 277 day of June, 2010

UNITED STATES MAGISTRATE JUDGE SOUTHERN DISTRICT OF NEW YORK

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gelting excess to a teruole computer. Network administrators use it to control Web and other kinds of servers remotely. SSH is a suite of three utilities—slogia, ssh, and sap—that are secure versions of the entire UNIX utilities, slogia, rsh, and rap. SSH commonds are encrypted and secure in several ways. Both enest of the dient/server connection are entireliated using digital certificates and passworks are protected by being encrypted. SSH uses RSA loboratory's public key cryplography for both connection and authentication. Encryption algorithms include Bowrish, DES, and DEA. IDEA is the default, SSHS, the latest version, is a managed each of standards from the laterate Ferriagenian and the Encryption. a proposed set of standards from the Internet Engineering Task Force (IEIF).

\$\$1D Short for Service Set IDdentifier, a 32-character unique Identifier attached to the

hooder of pockets sent over a wireless (WFFI) network that acts as a password when a notion of pockets sent over a whetes (WHH) network and cuts as a password when a computer title to connect to the network. The SSID differentiates one VIAMI from nonther, so all access points and all devices attempting to connect to that wheless network must use the same SSID. A device will not be permitted to join unless it can provide the unique SSID. An SSID is a shart, constantly-repeating transmission from a wheless device that contains list indomnation about itself. Intellige the "Broadcast SSID" option "off" on a wheless nod uponitive flat that the provide the transmission from some state of the area of the contains its SSL Secues Sockets Layer. SSI unders it possible to energy) and secure Web connections from unacrosary enwardsoneers. The Internat has congenit in any would of commerce through

from unsarrory expressionages. The Internal has opened a new would of commerce through electronic transactions. To keep unsarrory characters that provid the alleys and byways of cyberspace from stealing impodent, sensitive information that is sent across a network. cyberspace from steading impodent, sensitive information that is sent across a network, SSL is used to provide outhentication, encryption, and message integrity services. Secure sockets layer is a transport level technology for authentication and data encryption between a Web server and a Web bowser, i.e. senting documents around the internet and the Web. Developed by Netscope, SSL negatiates point-to-point security between a client and a server. SSL sends dollo over a "socket," a secure channel of the connection layer existing in most TQP/10 applications. Both internet Explorer and Mozilla Fuefox support SSL, and many Vieb sites use the protocol to obtain confidential user information, such as credit and formations. By convention, Web pages that require an SSL connection start with https: Instead of https://you.con/recognize-ties-secure notive by the S. Instant, SSL is the dominant security protocol for Internet monetary transactions and communications. Information belop transmitted is encrypted, and only the user's Web browser and the compouter server of the transmitted is encrypted, and only the user's Web browser and the computer server at the other end anning the Web site have the key, and thus can understand what each other is saying. No one else can. See also S-HTIP.

55ML Speech Synthesis Markup Language is a VXML (Voke eXtensible Markup Language) language for text to speech markup, See also VXML.
55M Subsystem Humber. The address used in the Signaling Connection Coalial Part (SCCP) kryer of the SS7 protocol to designate an application of on end signating point. For example, an SSM for CHAM (Colling Hame) at the end office designates the CHAM (colling Hame) at the end office designates the CHAM application within the end office. Usually, the SSM is a three digit number. BellSouth happens to use a CHAVA SSH of 232.

SSO See Single Sign-On.

SSP Service Switching Point. Also colled Signol Switching Point. A PSIN switch (End Office or Tondern) that can recognize III (Intelligent Network) colls and route and connect them under the direction of an SCP (Service Control/on). A computer dolobose that holds information on III (Intelligentilletwork) services and subscribers. The SCP is separated from the actual SCP switch, making it easier to introduce new services on the network. See SCP. For a full explanation of the Advanced Intelligent Network, see AIM.

SSRP Simple Server Redundancy Protocol. The LANE simple server iedundancy feature creates foult-floerance using standard LANE protocols and mechanisms.

SST Spicod Spectrum Technology. See Spread Spectrum.

SSTP 1. Switched Services Transport Protocol. See SCIP.

2. Double-Shielded Twisted Polic, as in Shielded-Shielded Twisted Polic. Also known as FUAF (Palis in Metal Fod). A cobling system Involving multiple twisted polic contained willful the same coble sheath. Each twisted poli is separately shielded by a metallic foil. The entire group of shielded pairs is then surrounded by another shield of metallic band or fod. See also Category 7.

See also Cotegory 7.

SSU Session Support Whity, a BTC-proprietory protocol that allows meltiple sessions to maximultaneously over a single serial coble. SSU is used to allow terminols to provide two session "windows" that can display session output simultaneously.

SSUTR2 Sous-Systāma Walisateur Teléphonia RNIS. This French national SSUT standard for the SSUT+ was defined in 1986 by the EISI. SSUTR2 and Telephone User Port + (TUP+) are closely related. The French TUP is the fallerfoce between fixed and mobile, retain SCT.

using SS7.

ST 1. STort signed to indicate end of outpulsing.

2. Stroight Tip. A fiber-optic connector designed by AT&T which uses the boyonet style

coupling rather than screw on as the SMA uses. The ST is generally considered that explain Accement for the SAVA type connector.

3. Signoling ferminol.

3. Signating territion.

ST Connection An optical medium connector plug and socket.

ST Connection See Shalph-Tip Connector.

ST-506/412 Interface One of several industry stoodord interfaces between the several industry in the several industry. ST-Bus Serial Interfaces are several industry in the several industry in the several industry. The ST-Bus Serial Interfaces in the several industry in the several industry. ST-Bus Serial Telecorn Bus. Nitel Senskonductor, which makes telecorn conceasing the structured its digital component product line around the ST-BUS. The ST-BUS is a hard speed, synchronous serial bus for horsporting Information in a digital formatism in the structure of the st provides the bondwidth necessary for newer multimedia applications. According

the advantages of using the ST8US ore;

1. Printed circuit board area devoted to information transfer behicein hardrand in ules is minimized.

2. Fewer tracks, backplane connections, and intra-shelf colles are needed compar

2. Tever in the pocaled polits.

systems that use pocaled polits.

3. The STBUS is designed to be divided down into individual chargets of 64 to resulting in improved elikidency and lower cost when several information rolls are on the several information rolls are on the several information rolls are on the several information rolls are only to the several r

resuming in impured consumers,

Additional glue logic is not required when using STBUS composible composible to proposed

5. From an IC perspective, the STBUS results in lower pin counts, imployed jaiou

ond lass power consumption.

57A 1. Sparning line Algorithm. A technique based on an IEEE 802. I stooked that levitects and eliminates logical loops in a bridged network. When multiple poils exist, 514 is a bridge use only the most efficient one. If that polit foils, 514 automatically (kindled) the network so that another path becomes active, sustaining network operations.

2. Special Temporary Authority. A special temporary authority granted by this FCL to operators of Politic Mobile Services (e.g., cellulor radio and Specialized Mobile Services (e.g., cellulor radio and SPAR) "upon a finding that there are extendrinary circumstances requiring opygative in the public interest." See also 10A and SPAR.

stubility Factor A cobling term. The difference between this peripholog provides a service and so volts/mil and at 40 volts/mil measured on while immersed in yields of 135 for a specified time.

for a specified time

Doisy Chain, Forklift, and Scalable.

stackable hubs Single protocol units designed to link various hubs; they they custing one large interconnected local area network (LAN). See Stackbes stacked antennas The use of multiple identical onlernas—generally Gode horizontally end-to-end (a collinear array), or horizontally in parallel (on excelor a

orroy). Also colled ganged antennos.
staffing busis A coll center term. The basis upon which staffing requirements and be either desired service quality for a given day of the week (v) to

of staff that will product the highest net revenue.

staffing requirements forecast A cal center term. A mission of the moment of employees required in each period of the day to bonds the lorens to the content of the day to bonds the lorens to the content of the day to bonds.

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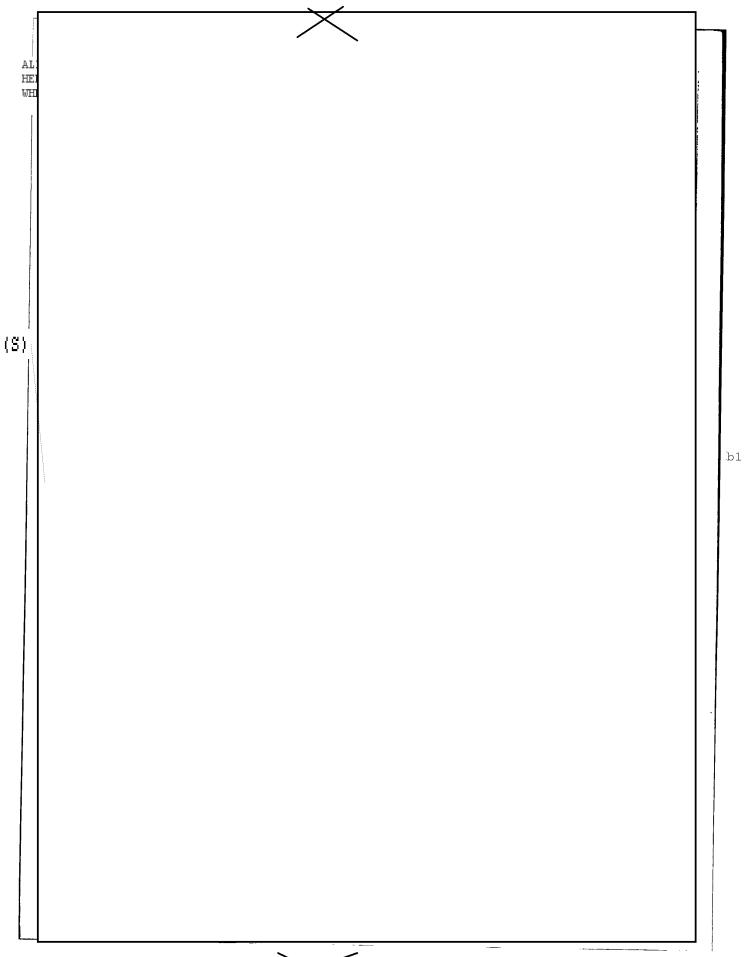
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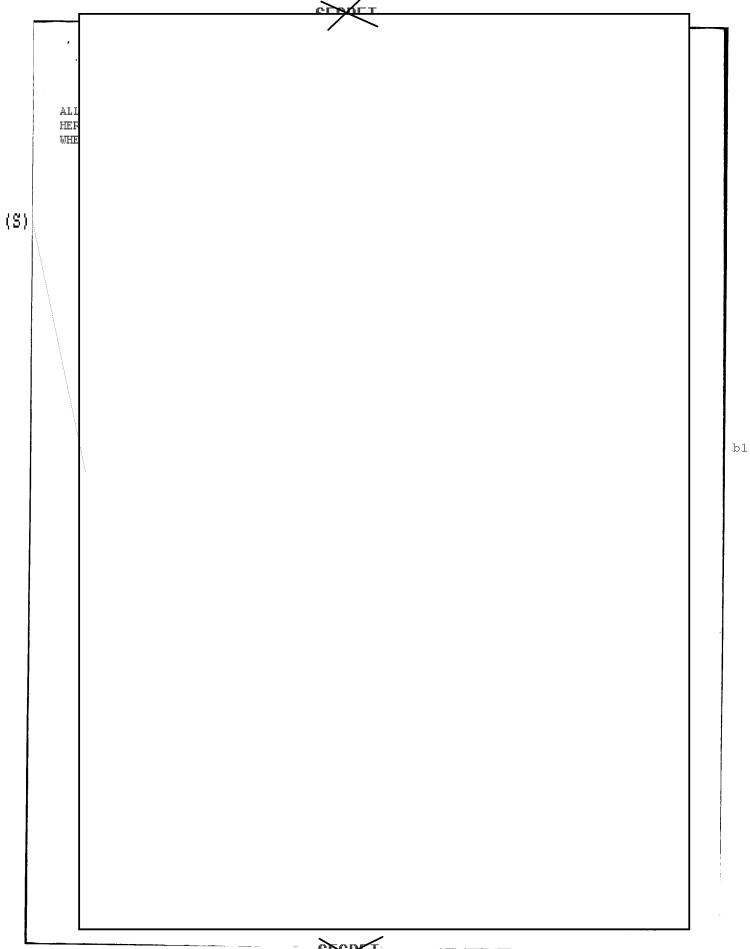


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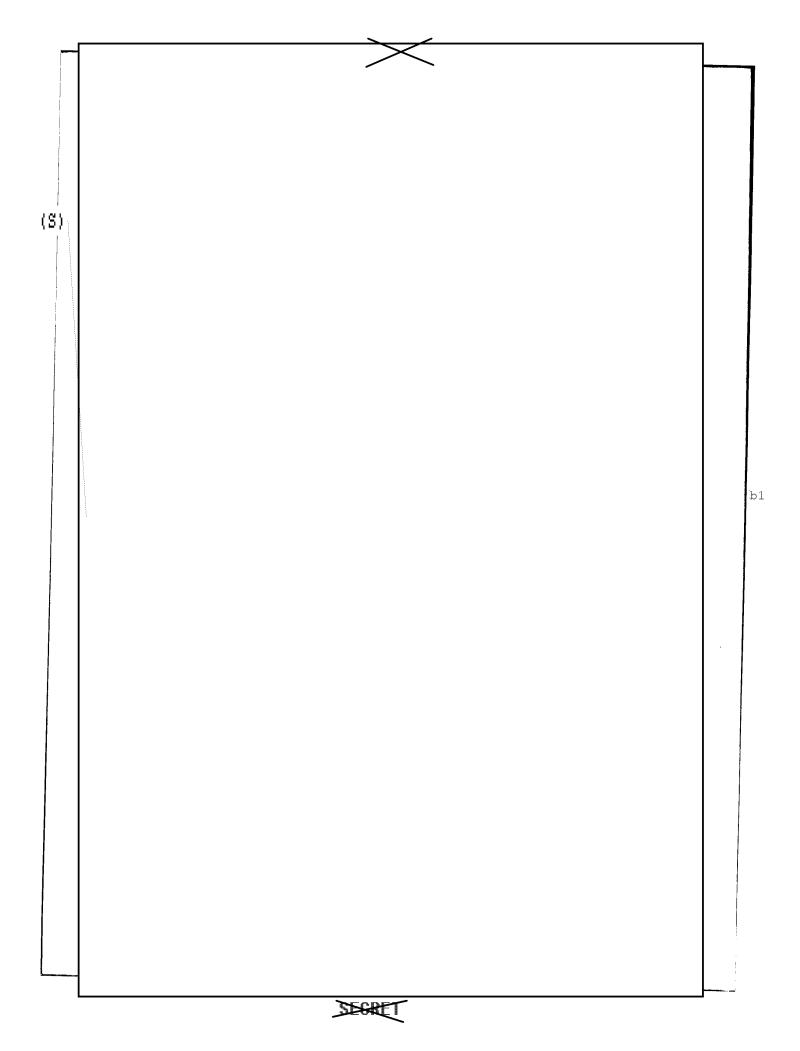


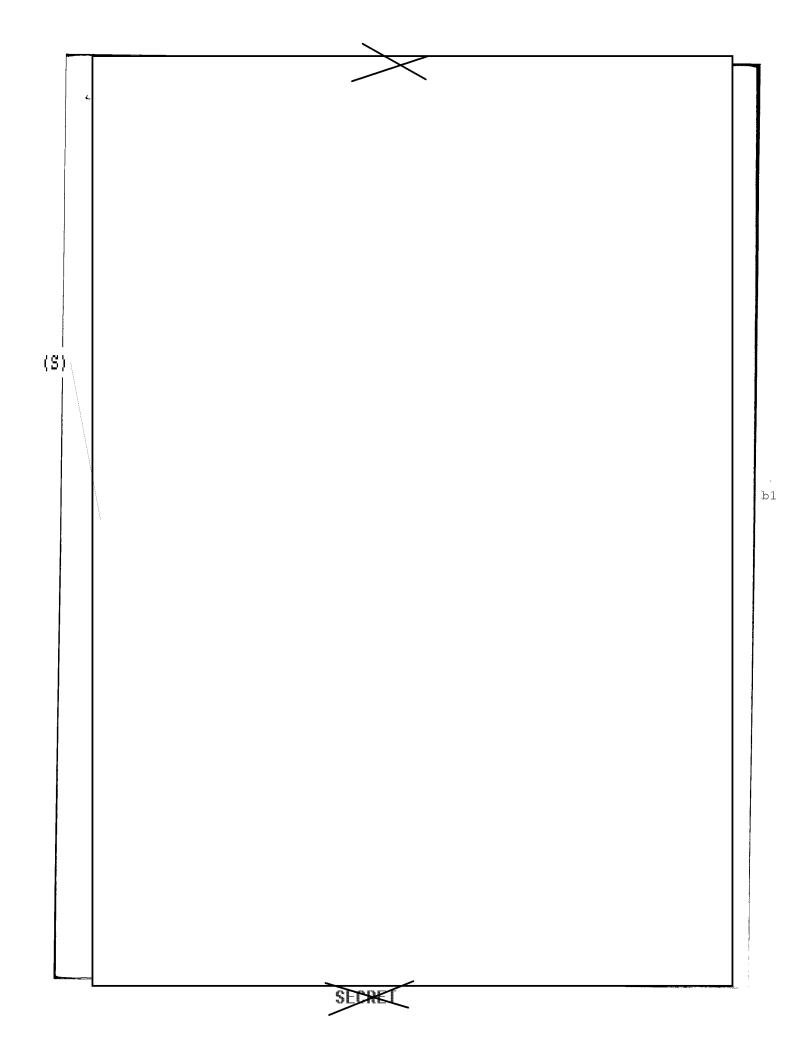
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This summary does not substitute the FISUR Logs

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that were made contemporaneously with the surveillance.

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,	(U) <u>Technical Surveillance:</u>	þ
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(S) Physical Surveillance	,
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(U) CONCLUSION	
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DATE: 11-29-2010

CLASSIFIED BY 60324 uc baw/sab/lsc 🗍

REASON: 1.4 (C,D)

DECLASSIFY ON: 11-29-2035

(Rev. 01-31-2003)

SESPET

FEDERAL BUREAU OF INVESTIGATION

		Precedence: ROUTINE (S) Date:	
		To: New York	ĺ
	(S)	From: New York Counterintelligence contact: SA	
		Approved By:	b1 b6
		Drafted By:	b70
		Case ID #: (S)	
	(S)	Title: FCI-RUSSIA	b1
	(S)	Synopsis: S) Surveillance log and observations for the operation conducted on	
		(U) Derived From: G-3 Declassify On: 04/20/2035	
	(S)	(x) Full Investigation Initiated:	
		DOCUMENTS AND/OR REPORTS PREPARED DURING THE COURSE OF THIS INVESTIGATION MUST NOT BE UPLOADED INTO THE AUTOMATED CASE SUPPORT (ACS) UNTIL ADVISED TO THE CONTRARY BY FBIHQ.	
		THE INFORMATION CONTAINED IN THIS MEMORANDUM IS HIGHLY SENSITIVE AND SHOULD BE HANDLED ON A NEED TO KNOW BASIS.	
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ıaı To:	New York From New York	
(S) Re:	(A)	
(S)		
(U)	NF) Physical surveillance was conducted by:	
	SA SA	
	SA -	
	SA SA ON	
	SA SA	ł
(U)	SA)
	observations are based on eillance video taken at Rockefeller Center.	
277	The FBI observed the following (all times are	
appro	eximate, but the chronology is correct):	
(S) \		
	X	
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on We	(\forall /NF) At approximately 1105, was located st 50th Street, walking eastbound between 5th and 6th	
Avenu S) ——	es.	
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/81	To: New York From: New York Re: (S)
(S)	
(S)	(%//NF) At approximately 1107, was located on West 50th Street and Rockefeller Center. She appeared to be talking on her cellphone. She was also observed to be looking around and seemed confused. She was observed to cross from the south side of West 50th Street to the north side and continue towards 5th Avenue.
(S)	on 5th Avenue, she then crossed the street and entered Saks Fifth Avenue.
(S) ——	outside of Saks Fifth Avenue and crossing 5th Avenue. She proceeded west between 49th and 50th Streets towards Rockefeller Center.
(S)	X
(S)-	table in the north-east section of Rock Center Cafe, adjacent to Cucina.
(5)	(%//NF) was observed wearing a dark colored fitted jacket, black long sleeve shirt, blue jeans and black Hitop sneakers with the word "LOVE" written on the side of them .
(S)	sat down at a table approximately eight (8) feet away from SA with her right side facing him.] then opened a silver laptop that she removed from a gobra looking had
(S) ^(S)	then opened and powered on the laptop. then entered several characters using the laptop keyboard. It appeared to SA that did not use any numeric keys nor did utilize the shift key when she
(S)	appeared to be entering her log on password.] Shortly after powering the laptop there was a visible window on the computer screen. was observed typing various characters into the computer.
(S) <	×

b1 b6 b7C

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^ (S) -	SECREP//NOFORN
(S)	To: New York From: New York Re:
(S)	/X//NF) At approximately 1155, stood up and walked south.
(S)	walking towards 49th Street. was observed in Rockefeller Center,
(S) <	
(U)	(K//NF) At that time, physical surveillance was discontinued.
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b1

(S) To: New York From: New York

Re: (S)

(S) (S)

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(S) (S//NF) From approximately 1151 through 1210

was observed shopping on the 1st Floor of Macy's Herald square.

On two occasions was observed trying on hats. On one occasion was seen using her iPhone to take a picture of a poster. At approximately 1204 was observed purchasing leggings with a credit card.

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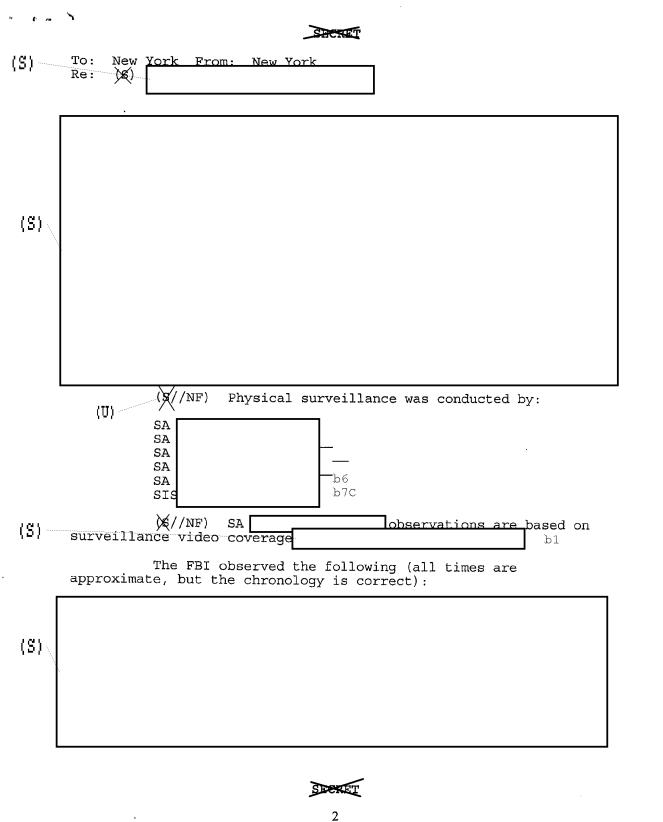
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To: New York From: New York Re: (*) 06/16/2010	
(S)	.cd.
(U) Physical surveillance was conducted by: SA	Ъ6 Ъ7С
(U) (NF) The FBI observed the following (all times are approximate, but the chronology is correct):	
(S) At approximately 1129 hours, observed walking westbound on Warren Street between Church Street and West Broadway. She was observed wearing a yellow T-Shirt, blue jeans and carrying a black bag. She continued westbound across Greenwich Street and entered Barnes and Noble bookstore, located at 97 Warren Street, New York, NY at approximately 1134 hours. (S) was observed sitting in the cafe section of the Barnes and Noble. She was observed taking a lapton computer out of her bar and turning it to be seen as a lapton computer out of her bar and turn	bl
laptop computer out of her bag and turning it on. (U) (X//NF) Technical coverage indicated that a computer signal began broadcasting at the same time.	

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s)	(S)	To: New York From: New York Re: (*)
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;	(S)	into the laptop computer, but that it was not the power cord. The wire led into the bag that
1	(S)	The wire led into the bag that had carried to the store. was observed working on her laptop.
	(S) <	
	/ C 1	was observed pulling the cord out of the computer and then plugging it back in.
	, o,	the computer and then plugging it back in.
	(S)	
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		(A)
	(S)	S//NF) At approximately 1159 hours, vas observed to stand up and move away from the cafe table. At 1202, she was observed departing Barnes and Noble.
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(U)		(%//NF) At approximately 122 terminated.	0, physical	- surveillance
	was	terminated.		
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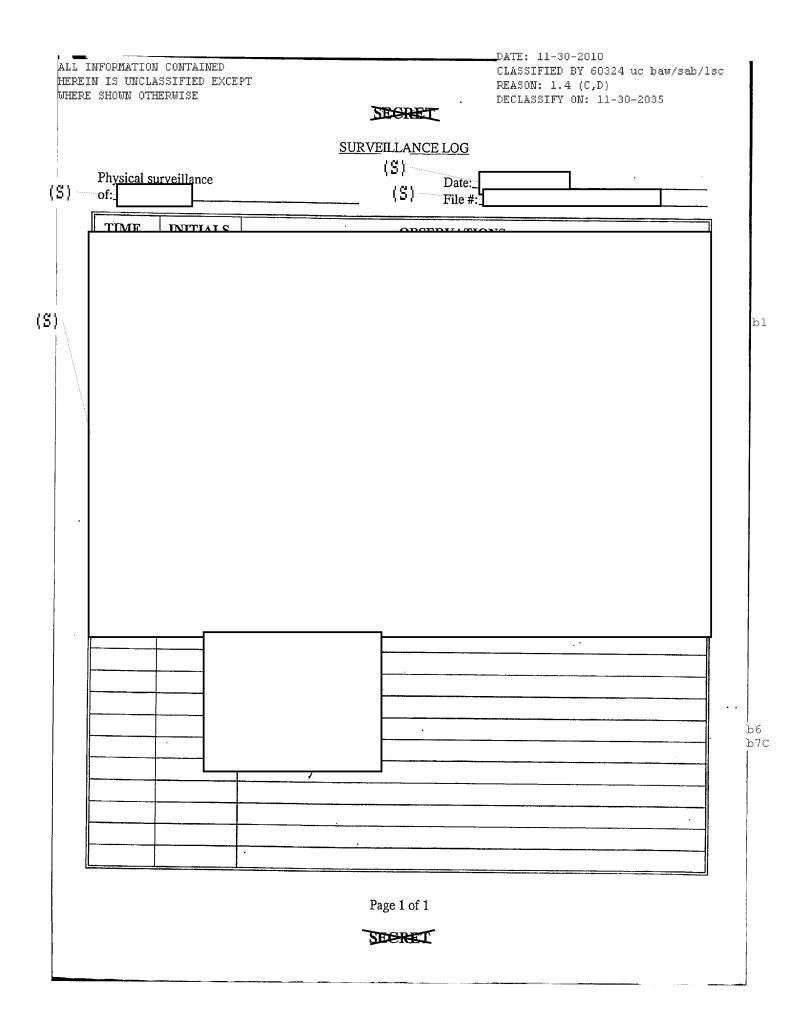
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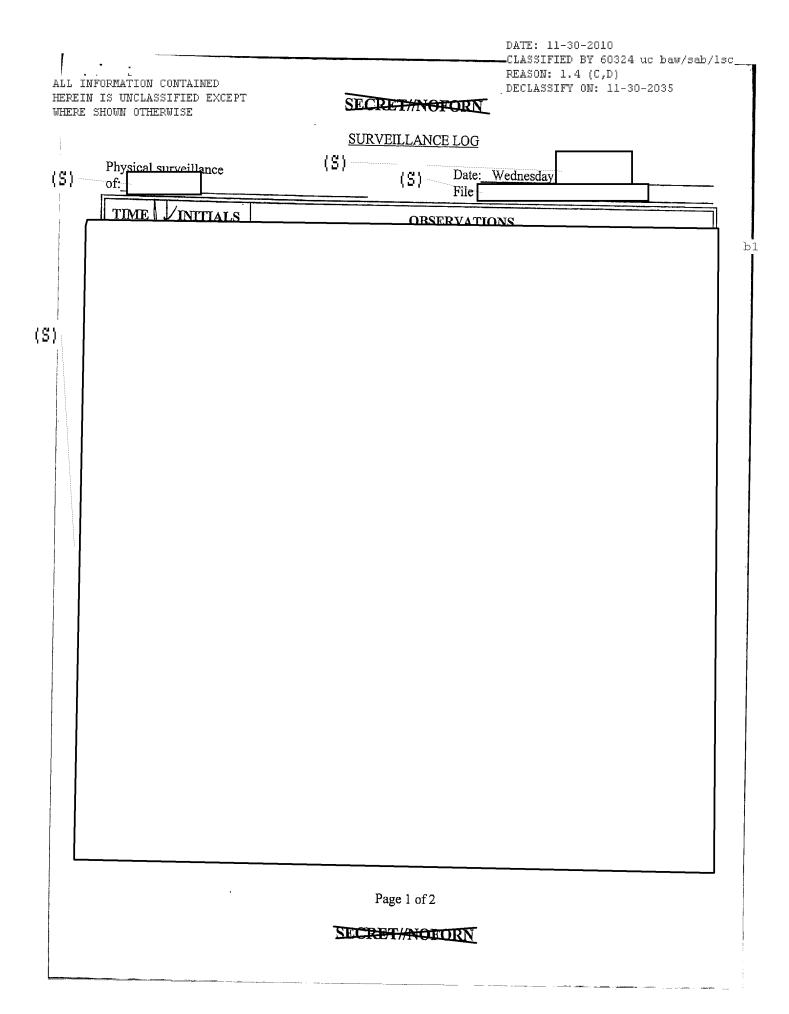
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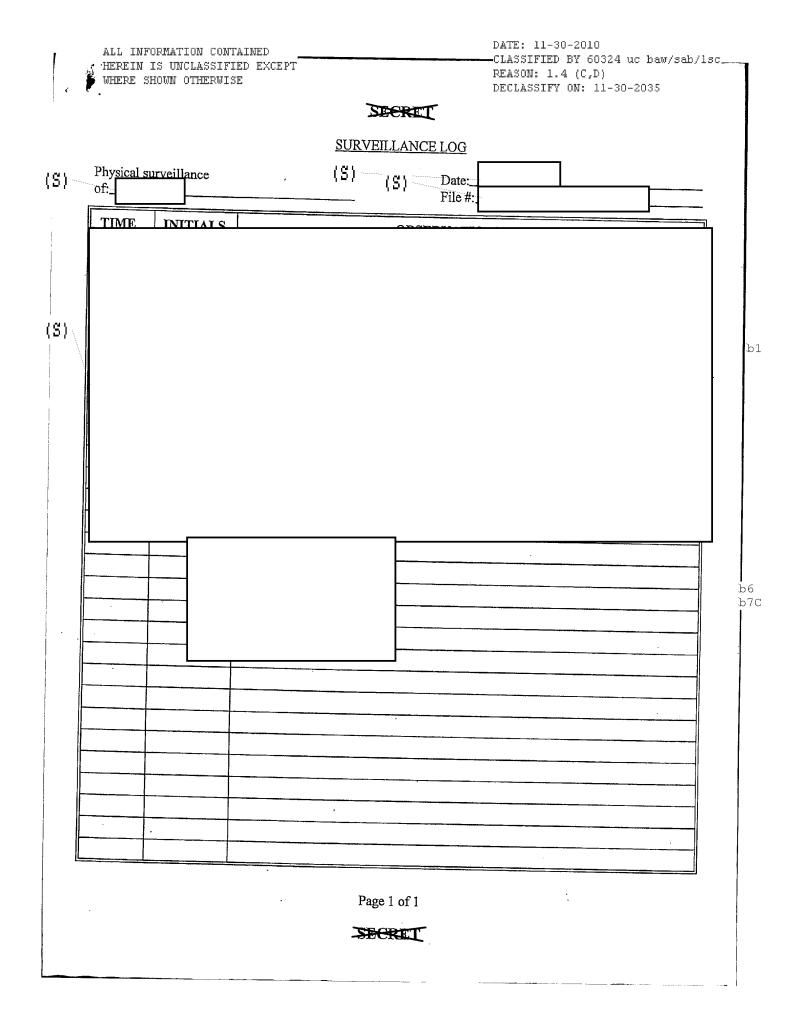
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(S) Subject:	Surveillance Log Cover Sheet (S) Day & Date: (S) Shift: Team:
	Conducted by:
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☐ Subject Observed ☐ Subject Not Observed ☐ Contact Observed	Assessment Data Obtained Unusual Activity Photos Attempted Video Attempted by by Prepared by: IS
Analysis / Administrative Data	Approved by: IS
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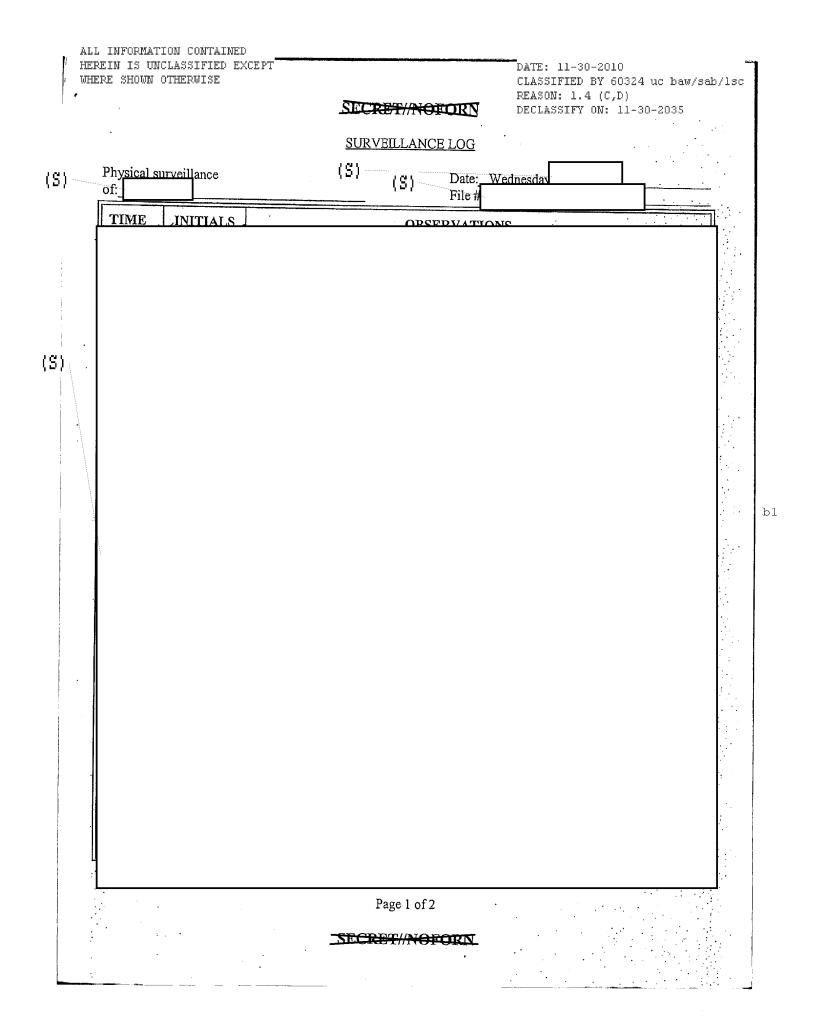


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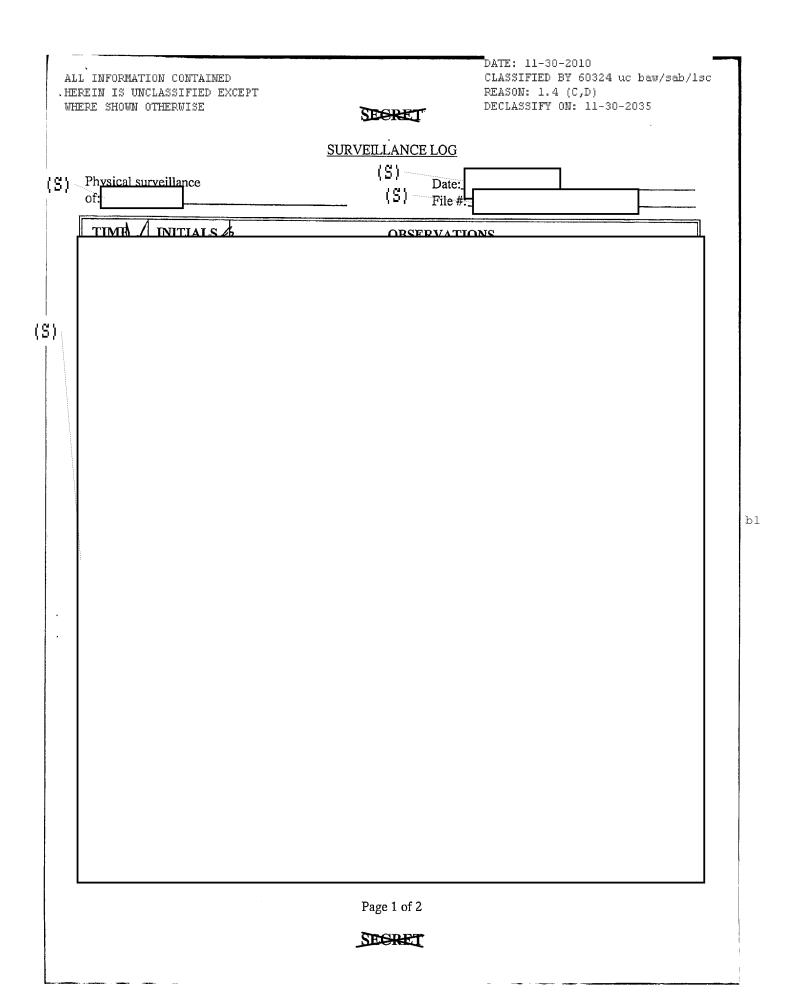
DATE: 11-30-2010 ALL INFORMATION CONTAINED CLASSIFIED BY 60324 uc baw/sab/lsc~ HEREIN IS UNCLASSIFIED EXCEPT REASON: 1.4 (C,D) WHERE SHOWN OTHERWISE DECLASSIFY ON: 11-30-2035 SECRET/NOFORN Surveillance Log Cover Sheet (S): (S)Subject: Day & Date: Wednesda b1 Shift: 7am-3pm (S) Conducted by: ' SI b6 <u>-SI</u> b7C ٤IS · Subject Observed X Assessment Data Obtained ☐ Unusual Activity ☐ Subject Not Observed ☐ Photos Attempted X Video Attempted ☐ Contact Observed by _____ b6 b7C Prepared by: IS Analysis / Administrative Data Approved Nv: c (S) wpd (S) b1 (S) File# (S) Derived from: FBI NSISG 06/15/2009 Declassify on: 4/7/2035 Page 1 of 1 SECRET/NOFORN



SECRET#NOFORN SURVEILLANCE LOG Physical surveillance (S) (S) Date: Wednesday, (S) -TIME INITIALS **OBSERVATIONS** b1 12:11pr (S) 12:30pr b6 b7C Page 2 of 2 SECRET/NOFORN

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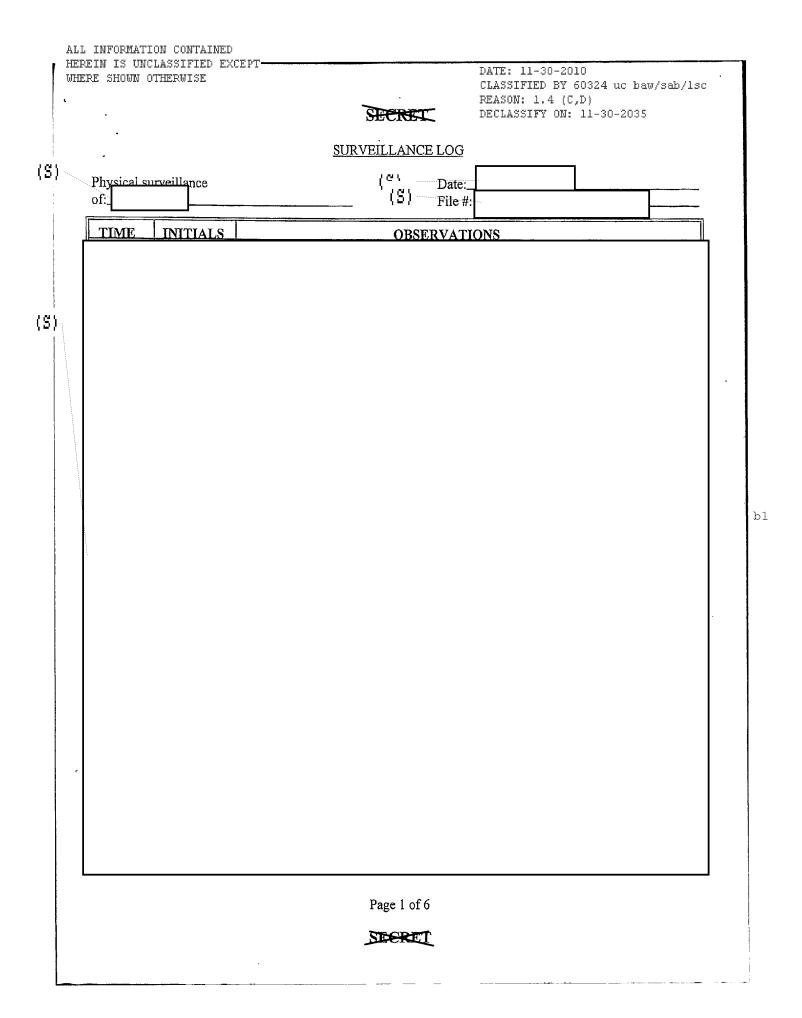
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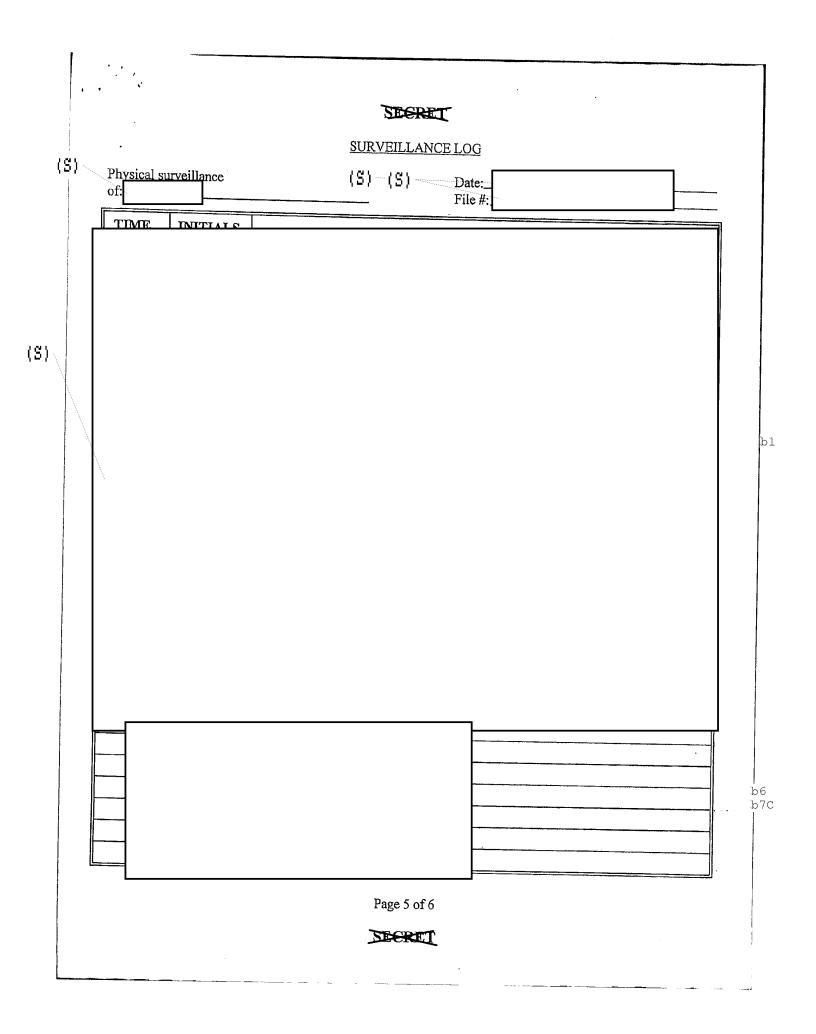
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DATE: 12-01-2010 ALL INFORMATION CONTAINED CLASSIFIED BY 60324 uc baw/sab/lsc HEREIN IS UNCLASSIFIED EXCEPT REASON: 1.4 (C,D) WHERE SHOWN OTHERWISE DECLASSIFY ON: 12-01-2035 SECRET Surveillance Log Cover Sheet (S) Subject: (S) Day & Date: Wednesda b1 FCI-R Shift: 7am - 3pm Conducted by: X Subject Observed Assessment Data Obtained b7C Unusual Activity ☐ Subject Not Observed ☐ Photos Attempted ☐ Video Attempted Contact Observed by _____ Prepared by: SIS Analysis / Administrative Data Approved by: SIS M FISUR teams were tasked to provide static surveillance coverage at pre-determined locations on said date. (S) < b1 (S) File #: wpd (S) Derived from: G-3 Declassify on: X-1 Page 1 of? SECRET

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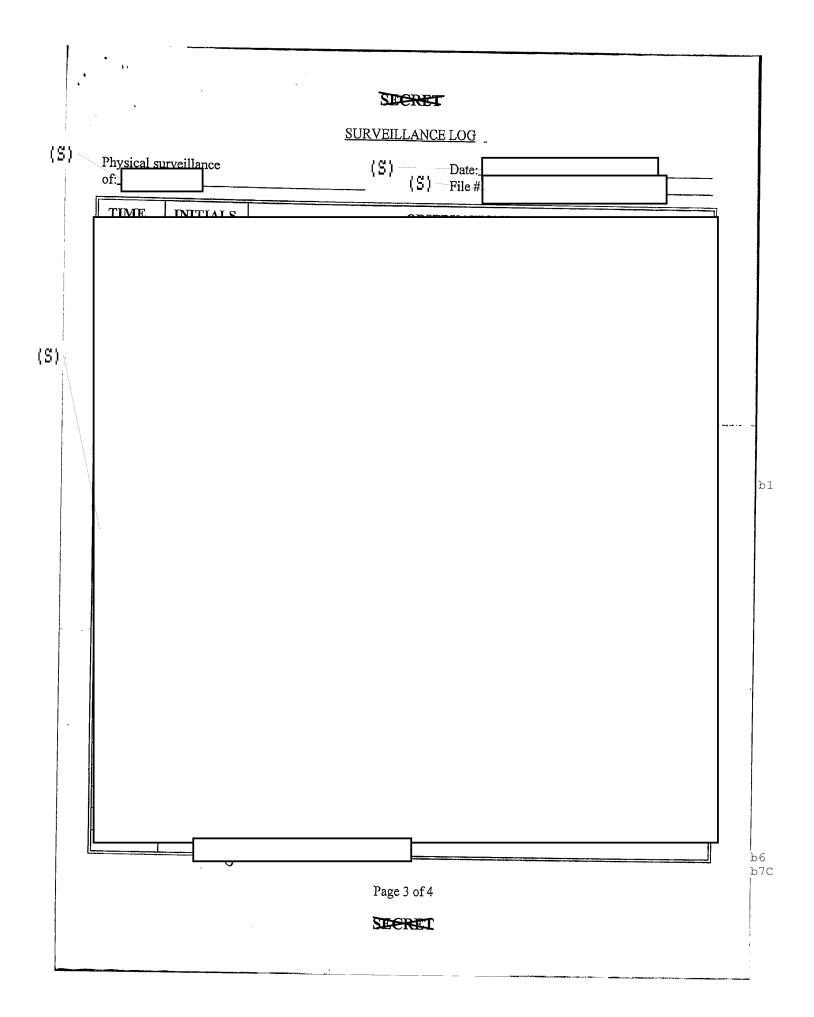
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DATE: 12-01-2010 ALL INFORMATION CONTAINED CLASSIFIED BY 60324 uc baw/sab/1sc_ HEREIN IS UNCLASSIFIED EXCEPT REASON: 1.4 (C,D) WHERE SHOWN OTHERWISE DECLASSIFY ON: 12-01-2035 SECRET SURVEILLANCE LOG Physical surveillance (S) Date: (S) of: _(S)_File#: TIME A INITIATE OBSERVATIONS (S) b1 Page 1 of 3 SECRET

SPERIT SURVEILLANCE LOG Physical surveillance of: (S)-(S) Date (S)-File# TIME b1 **(S)** b6 b7C Page 2 of 3 SECRET

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DATE: 12-01-2010 ALL INFORMATION CONTAINED CLASSIFIED BY 60324 uc baw/sab/lsc HEREIN IS UNCLASSIFIED EXCEPT REASON: 1.4 (C,D) WHERE SHOWN OTHERWISE DECLASSIFY ON: 12-01-2035 Surveillance Log Cover Sheet b1 Subject: – (5) Day & Date. <u>Wednesday</u> Shift: 7:00am-3:00pm Team: Conducted by: SIS **IS** IS IS X Subject Observed X Assessment Data Obtained ☐ Unusual Activity ☐ Subject Not Observed ☐ Photos Attempted ☐ Video Attempted Contact Observed Prepared by: SIS Analysis / Administrative Data Approved by: SIS FISUR Teams were tasked to provide static surveillance coverage at pre-determined locations on said date. (S) b1 ·File# (S) W DVINGER Derived from: G-3 Declassify on: X-1 Page 1 of 2 SDERLI

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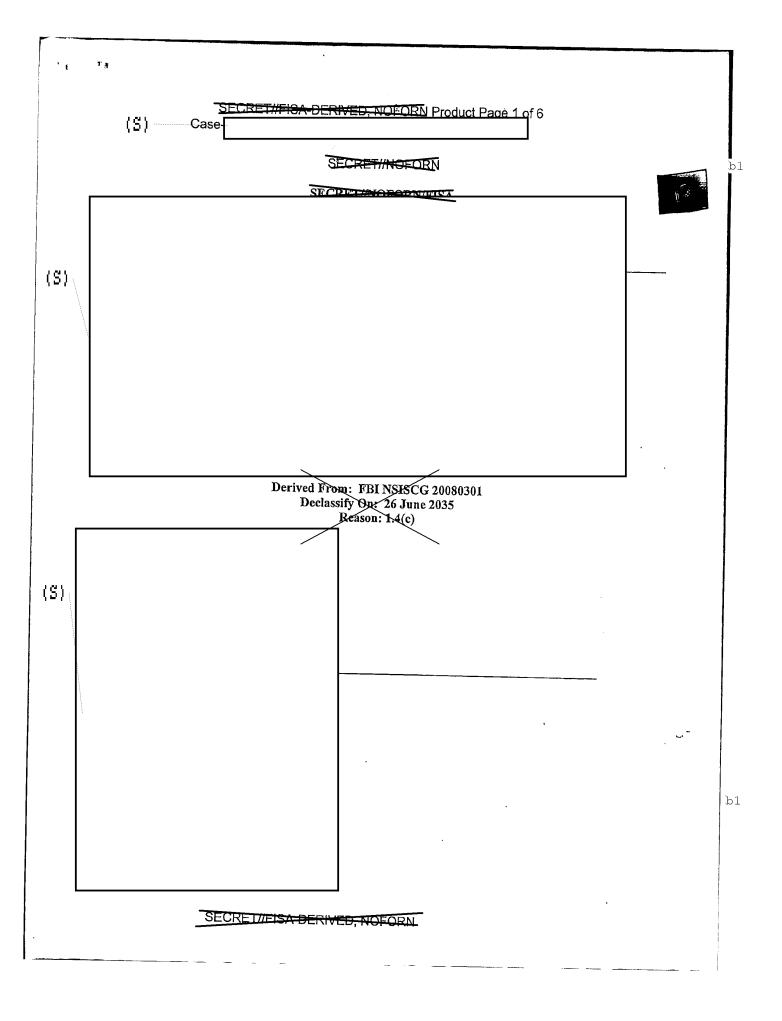
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Continuation of FD-302 of

Anna Chapman

On 06/26/2010

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Declassify On: 06/27/2035

AC: Talk

UCA: Sure, ok so I am, I work in the same department as you but, I work here in the consulate. Ok My name is Roman(SP?). My name is Roman, I work in the consulate. So, I know that you

AC: How come you are flying back?

UCA: I'm not, I just have to tell to you see you tonight, because I will explain

AC: oh

UCA: Basically, there is a situation that I need your help with tomorrow which is why its not like regular email contact or website contact and this could not wait until your Wednesdays, you know. When was the last Wednesday that you...

AC: It was this one but

UCA: Ok. So this Wednesday now you will do it?

AC: No

UCA: Next Wednesday?

AC: Yeah, It will be not this one but, next week UCA: Ok, I know you are having some problems with the

connections. I am not the technical guy AC: umm...hmmm

UCA: I don't know how to fix it, but if you tell me, I. can pass it up. But, basically I know you are going back to Moscow in two weeks.

AC: Yeah

UCA: So, ah when you go back they will sit down with you and talk officially about your work, your performance, ah- but, for now I just wanted to see how you are doing, how everything is going and then I have a task for you to do tomorrow. Ok?

AC: A short task?

UCA: yeah, tomorrow at 11 oclock in the morning. Can you do it?

AC: (sighs...)

UCA: I will explain what it is but I need you to do it tomorrow morning. When I explain you will understand. Ok AC: Ok, how long will it take because I need to like explain... It's going to need a lot of explanation UCA: for you?

AC: yeah

SECRET/NORORN

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Continuation of FD-302 of

Anna Chapman

_{,On} 06/26/2010

UCA: ok, to your friend

AC: yeah...just don't tell him

UCA: ok it won't take long. Like half an hour. Half an hour maybe. And once you are done with this then its ok everything will go back to normal and you go back to regular schedule not this Wednesday, next Wednesday go back to regular schedule and that is it.

AC: umm...hmmm

UCA: You understand. But, this is not like, this is not like the Wednesdays with the notebooks, this is different it is, it is the next step. You are ready for the next step. Ok?

AC: Ok

UCA: I will explain. So you ok? AC: So, you are flying back?,

UCA: Tomorrow No, I work here in New York. But, this could not wait til, this could not wait til Monday

AC:umm-hmm

UCA: this had to get done, ok because I will explain. There is a person here who is just like you ok. But, unlike you this person is not here under her real name. Ok. So she was in the country and to do that we have to give her new document. Understand? So, I have the documents for you to give to her tomorrow morning. Once you do that, once you give her the documents that's it. AC: Ok

UCA: So, I have it. I can show you, but this is what I mean by next step because this is not laptop to laptop, this is person to person. She is just like you ok

AC: Is she in New York?

UCA: No, she is in New York and she needs your help. Do you understand?

AC: Ok

UCA: Are you ready for this step?

AC: Shit, of course

UCA: So, tell me the notebooks? Are you still having a problem with the notebook? With the connection?

AC: Yes. I thought you were flying back so it is alright UCA: Do you want me...well can give it to consulate if you want them to look at it or you can wait and take it home yourself to Moscow

AC: It would be more convenient if I gave you it UCA: Ok show me... Like I say, I'm not a technical guy

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Continuation of FD-302 of	Anna Chapman	,On06/26/2010,Page4
	AC: yeah, I know but, if you could you the bag?	
(S) -	or one sending	m with? The encryption
(S) ———	AC: Vac wall it doesn't work who AC: From that	en I press
(\$)	UCA: So you are not able to receive AC: Not because, process? UCA: I don't know the full process.	do you know the
(3)	AC: If you explain to someone who buch: Ok. So when you say AC: Happens? UCA: Happens? Ok. Do you want to shad: It can't, it can't.	cnows just that nothing
	AC: It can't, it can't. It can not UCA: Ok, Ok, I will take it. I will tomorrow, do you know, do you know Center? AC: Yeah? UCA: You do? ok AC: Yeah	work back home.
(S)	UCA: So, this is where you have to AC: Ok	
(S)	UCA: Do von know this? I can show v	Ol Ok so
(S)	prace. It's like AC:	This is the
(S)	on top and they can walk under it AC: Ok	walk to it…it you walk will see it. Its like
(S) <u></u>	UCA: you don't know this place? Its So, what is right here on this street, right place and this place. There is bench	I want for you to be

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,_{On} 06/26/2010 Anna Chapman Continuation of FD-302 of , Page sit down and you can wait for this person (S)UCA: (S) Ok, so you sit down right here on the bench and you wait like 11 oclock. Ok? But, do not be late and I will show you. So this is the passport. This is the person, this is not her real name but, you can call her this name if you wish. Ok, this is what she look like. So, she will come to you give her the passport and you are done. Except for one thing, I will explain. When you are done, you give her this document. This is, you can take this. AC: umm...hmmm

UCA: When you are done, I need you to come back here to this location

AC: umm...hmmm

UCA: so that I know that everything is ok. Ok? You can't see from here but, when I walk out there is a city map, you know what I am talking about when you look streets? Go to the map after you are done come up to the map and I will give you the thing all you do is stamp, all you do is put it on the side of the map like you are looking at the map, you know the map. Just come to the map and put it on the side and then I will check it and I will know that everything is ok

AC: Where is this map again?

UCA: I will so right now this corner in this park when we walk out I will show it to you ok, so you cannot miss it. So, very important when come, she will come to you so the way that she will know you is you just hold this in your hand like this. Just hold it in your hand and she will come to you. And keep this in there if you want, she will come to you. She will tell you, ok very important, she will tell you. She will ask you, excuse me but haven't we met in California last summer and you will say to her no I think it was the Hamptons AC: The Hamptons?

UCA: The Hamptons and that is it. That is how you know and you just exchange, just give her the document and then after this I need you to come back, put the stamp and then after this it is all normal schedule ok, you can

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Continuation of FD-302 of

Anna Chapman

On_06/26/2010, Page

go back to Wednesday. If it doesn't work well, oh you will not have this, so just go through your regular email and websites and when you go back to Moscow in two weeks they will give you the new one and it will work. Ok, can you repeat for me

AC: Do you know if they received any of my messages? UCA: I don't think so.

AC: Really?

UCA: I don't know, I don't know, I am not...they give me instructions to give to you. I am not the technical guy. I am not supposed to know. DO you know what I mean? But I will check and go back when you go back to Moscow they will sit down with you and they will talk to you. They will probably give you a new one. So this one cannot be AC: ok

UCA: fixed. So can you please repeat all the instructions to me

AC: She, I am going to hold this and she is going to ask me if she met me in California last year and I am going to say

UCA: last summer

AC: Ah- last summer. And I am going to say, no it was in the Hamptons

UCA: It was in the Hamptons ok and then

AC: and I give her everything and then I close up this

bag

UCA: Ok I will show you where the stamp is. Um ok, very good. Um, Let me see. Oh, I forget- you have the passport? She has to sign it

AC: ???

UCA: So, when you give this to her, remind her that she has to sign it. She does not have to sign it right there, but she has to know she has to sign it AC: ??

UCA: you could just put it in here. You now what, just take this all and put it in the bag and I will take this ok. Ok, do you have the map that I gave you? AC: Here

UCA: Can you show me again the map. Ok, so you can take the cab. You can take a taxi if you want right here, exactly, You can take a taxi or you can walk AC: Wait, right here, right

(S)

Anna Chapman Continuation of FD-302 of

On 06/26/2010

UCA: right, exactly, right here and there is benches here, two or three benches. You can sit down any bench and then she will meet you, you will talk to her and then you come back here and do the stamp and then you are done AC: uh-huh

UCA: you understand? Ok, this is very important because this is for this

AC: I know

UCA: Ok, so now tell me...how are you doing? Ok?

AC: I am good, I am good. Just a little tired, that is

UCA: I know that you came long way to meet me so I

AC: Yeah, I will have to somehow explain why I have to go

back

UCA: Oh, tonight?

AC: Yeah

UCA: So, you can think of something

AC: I will think of something, about two things. So, this

is next Wednesday

UCA: yeah, obviously, but you just wait

AC:

UCA: You just go back

AC: I have some news to find out for next Friday and then I am free to go

UCA: You what? AC: With documents UCA: With your visa

UCA: Ok, do you understand all the instructions that I

gave you?

AC: yes, they are all very simple?

UCA: Simple. Ok, make me happy ok please

AC: Ok tomorrow at 11, I am going to be sitting at one of the benches, she is going to ask me if she saw me in California, I am going to say no, it was in the Hamptons, I will take the documents, tell her to sign. I will hold the journal, this is how she will recognize me and then I go back and put the stamp

UCA: don't forget to remind her to sign

AC: yeah, yeah

UCA: the passport. Ok, any questions for me? AC: No, I have to go and check this space

UCA: tonight?

AC: yeah, yeah

SECRET/NOFORN

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Continuation of FD-302 of

Anna Chapman

On 06/26/2010

UCA: ok. But, you will know as soon as you walk there you will see the grass above it's like higher than the above. Kind of strange looking but, when you walk there you do it up

AC: You're positive no one is watching?

UCA: You know how long it took me to get here? 3 hours. So, here I am comfortable. But, when you go, you know, be careful. And trust, who am I, a guy with a bag. So Ok. Ok thank you. Ok, so we will walk out and I will show you this map.

AC: So, that map is not your map, but in general that's like

UCA: Not, its not only for you Its not my map AC: So, in case I have a question tonight?

UCA: Don't call me. We are done. Ok. You and I will not meet

AC: But, just in case keep it

UCA: I will keep it if its, you know. I will keep it until tomorrow but, you understand the instructions that you have to do so you will be ok. Are you ready? AC: Yes, I you know I just have mixed feelings about this. I am just worried about my explanations cause I arrive there half an hour before you call me and it took me three hours to get there so I had to tell them that in half an hour I have to go back and then and now UCA: But, tomorrow you can go back AC: yeah

UCA: After 11, 11:30. But, you are ok. I can see that you are ok.

AC: Yeah, Yeah. I am ok. I am wonderful.

UCA: Good, but, what I what your colleagues back in Moscow, they know you are doing a good job and they will tell you this when they see you. So, keep it up. Ok?

AC: How are you? Is it difficult for you?

UCA: This is my job, you know? It's busy, it's long days because I have to do my work at the consulate and other work. So, but, I am here almost four years. So, you know AC: So, you work here in the consulate? UCA: um-hum

AC: ok- so who instructed you to do this

UCA: I don't have any answers, I just have instructions AC: Ok, Its just really scary



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Continuation of FD-302 of

Anna Chapman

On 06/26/2010

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UCA: You are good. You will be good. Ok, so let us walk outside. I will show you the map. We will walk up to the map to look at it and then I will go, you will go. Ok? AC: Ok

UCA: Ok- right here at the corner

AC: Ok, here I see it. On what side? The side that UCA: I will show you. Let's walk up. On the side, this one, ok? So, just like this. You are looking at the map and just right here on the side. Ok? If you want to, If you want to put it upside down so I know you know its not just there is no stamp but, I still know if it is upside down that everything is good. Ok?

AC: Upside down? UCA: Yeah, the stamp

AC: Ok yeah, you mean like ok

UCA: like

AC: Picture down?

UCA: Picture down, no, no anyway, anyway you put it here

I will know. So this one here

AC: Ok

UCA: Nice to meet you, good luck, I know you are doing a

good job. I may see in you in Moscow. Ok, see you.

AC: Bye

SECRET

DATE: 12-01-2010

CLASSIFIED BY 60324 uc baw/sab/lsc

REASON: 1.4 (C,D)

DECLASSIFY ON: 12-01-2035

FD-302 (Rev. 10-6-95)

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE

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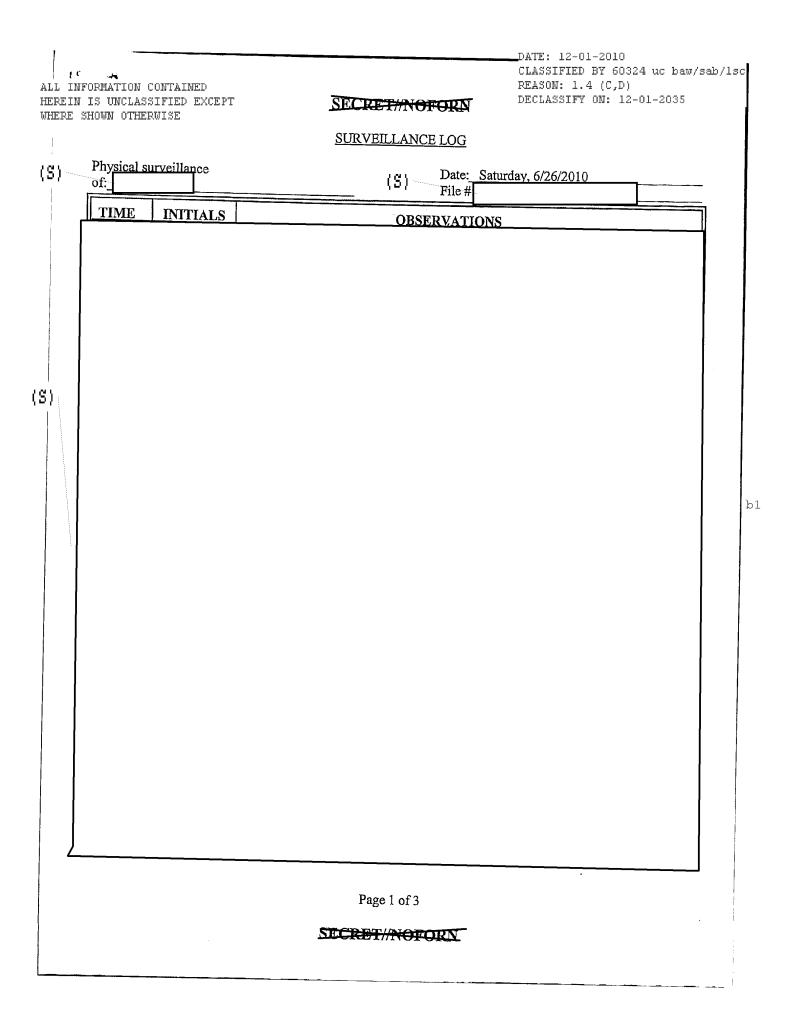
FEDERAL BUREAU OF INVESTIGATION

761	Date of transcription 06/30/2010	
(S) (S)	met with ANNA CHAPMAN at approximately 4:30 n m on 06/26/2010 at	
(S)	York. During the meeting introduced himself to CHAPMAN as ROMAN LNU, an employee of the Russian Consulate in New York, who had an urgent task for CHAPMAN.	
(S) (S)	chapman with a U.S. passport along with instructions on how to	
(S)	with a Toshiba laptop computer, along with the charging unit for said computer. The meeting concluded at	
	approximately 5:00 p.m. on 06/26/2010.	2
(S) Investi	igation on 06/26/2010 at Manhattan, New York	
File #	Date dictated 06/30/2010	
(S) by	1 (m)	

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DATE: 12-01-2010 CLASSIFIED BY 60324 uc baw/sab/lsc-REASON: 1.4 (C, D) ALL INFORMATION CONTAINED DECLASSIFY ON: 12-01-2035 HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE SECRET/NOFORN (S) < Surveillance Log Cover Sheet Subject: Day & Date: Saturday, 6/26/2010 b1 (S) (S) Shift: 3pm-11pm Team: Conducted by: b1 ☐ Assessment Data Obtained ☐ Unusual Activity ☐ Subject Not Observed \square Photos Attempted ☑ Video Attempted X Contact Observed by _ by IS Prepared by: IS Analysis / Administrative Data Approved by: SIS e062610.wpd (S) b1 File #: (S) CD-1 Derived from: FBI NSISG 06/15/2009 Declassify on: 2035 Page 1 of 1 SECRET/NOFORN



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DATE: 12-01-2010

CLASSIFIED BY 60324 uc baw/sab/lsc

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REASON: 1.4 (C,D)

DECLASSIFY ON: 12-01-2035

-	FD-192 Revised 01/09/2009		UREAU OF INVESTIGATION CE DATA-LOADING FORM	
	Separate forms are mandat types of evidence.	ory for evidence seized on different da	tes, at different locations, by different individuals, for different	
S)	Type of Evidence being su General Evidence Valuable Evidence Evidence Purchase Drug Evidence CART	☐ Firearms ☐ Weapons	Warning - special handling Body Fluids Other Whole Blood HAZMAT Refrigeration Enviro	
(S)	Case ID: Person Acquiring Evidence Source from which evidence	Date Acqui	126/10 1/ 4:24 pm	
	[Person's name/job title/con	mpany/address]	ow a	
•	Anticipated Disposition:	Forfeiture Po	otential: Federal Taxpayer Information:	
	Sealed By: [printed name] Estimated Dollar Value:		Wifnessed By: [printed name]	
	Complete Description of Ev		Total Drug Package Weight:	
	1. ONEC() Make	dence: (Please Print)	+ Rapid Thatel Changean	
	3. ONECT) Chr.	oma Agreement dollario DD: 1509 1944 188 8	+ Rapid Thatel Changesen 26/26/10 6:41 pm Store # 005 and 06/26/10 18:18 Burkly Ny NY But Accord: 0256384441	69 HVZ U215
	A oreco ?nep		\$15 paretill count for # 536 736 600	8
	5. OPEL) Trac	done prepart cont	8124.99 Pirt 57688 17896 7369	·
				3-1

This form is to be used as a data-loading form only. ECT is to discard this form when the information contained herein has been entered into Evidence Data Base.



ALL INFORMATION CONTAINED

-HEREIN IS UNCLASSIFIED

DATE 12-01-2010 BY 60324 uc baw/sab/lsc



004 vised 16-2009

FEDERAL BUREAU OF INVESTIGATION EVIDENCE CHAIN-OF-CUSTODY

E	4	6	6	9	1	2	6

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Evidence Type: General	□ Drug □Valuable	,□ Firearm/Weapor □ Firearm/Other	1
Special Handling Instructions		Initial Receipt	Date and Time
☐ Batteries ☐ Biohazard ☐ FGJ☐ HAZMAT ☐ Latents ☐ Refri☐ Req. Charging ☐ None☐ Other	gerate Print	ed Name:	6/26/20 7:24 8
Relinguished Custody	Date and Time		Date and Time
Signature: Printed Na	6/26/2019 7:41/PM		6/24/20
Reason: Relinguished Custody to CP Relinguished Custody	Date and	Reason: Accorded controls a co	7:42,,
Signature:	Time	Accepted Custody	Date and Time
Printed Name: Reason: Relinguish for last he to T. Freigh	6/2-9/20/0 9:00 Ar	Print	6/29/2016 9:08 MM,
Relinquished Custody	Date and Time	Reason: ACLEPTEN CUSTODY Accepted Custody	Date and
rintes yam	8/09/2010	Signature: Printed Name:	06/25/10
eason: Paragusano Custory Agent	4:30 PM	Reason: Accept Costales	4:31pm
Relinquished Custody	Date and Time	Accepted Custody	Date and Time
ignature:		Signature:	
eason:		Printed Name: Reason:	
Relinquished Cust	Date and Time	Accepted Custody	Date and
gnature:		Signature:	4.111.0
inted Name:		Printed Name:	
ason:		Reason:	
arms Certification: ted Name:	ignature:		
TD:	: : : : : : : : : : : : : : : : : : :	Date: Barcode: C4669	100

DATE 12-01-2010 BY 60324 uc baw/sab/lsc



With us, it's personal.

Store #00564 462-70 5TH AVE. BROOKLYN, MY 11215 (718) 499-7500

Register #3 Transaction #1213319 Cashier #5648138 6/26/10 6:41PM

I VERIZON IMPULSE \$15 CARD 15.00 T

1 Items Subtotal 15.00 Tax 1.33 Total 16.33

*VISA * 16.33 VISA card * #XXXXXXXXXXXX2498 App # AUTO Ref # 536955

Card Present Tendered 16.3 Cash Change .00

*** Prepaid Card Activation ***
Activation Amount: 15.00
Card Number: *********3/03
Transaction ID: 0



T - Taxable

FREE Rx Savings Program*

Save up to 20% on thousands of brand name and generic prescription medications.

Ask your pharmacist to sign Jos up today!

"DISCOUNT ONLY - NOT INSURANCE. Certain limitations apply. See pharmacy for details.

Earn Up To 20% Off With Your wellness+ Rewards Card

Enroll now for the FREE wellness+ Rewards program to receive additional discounts.*

If you are already enrolled, be sure to activate your online account at www.riteaid.com..

*See store associate for metalls.

CUSTOMER AGREEMENT

Order Status:

869244148 Order Dafe: Sat Jun 26 18:13:53 EDT 2010 Bill Acct. No.: _0286394441

Please print 3 copies of this form using your browser print button 1-Customer 2-Store 3-Verizon

Agent Name:

Bash Wireless Corp

Agent Address:

Verizon Wireless, 315 9th Street, Brooklyn, NY 11215-4007

Billing Outlet ID: 000091273

Activation type: Individual New

Upgrade Annual Upgrade

Calling Plan Change

Add-on

X Prepay

CUSTOMER INFORMATION

KUTSOVA, IRINE

99 FAKE ST

BROOKLYN NY 11215-0000

USA

Work/Alternate Phone:

Home Phone: 718-555-9080

PRIMARY USER INFORMATION

KUTSOVA, IRINE 99 FAKE ST

BROOKLYN - NY 11215-0000

USA

No. of Lines Approved: 1

Deposit Req. Per Line: \$0.00

Account Information

Line 1

Account No.: Wireless No .:

0286394441

718-594-0290

Wireless No. Barcode:

ESN/MEID:

A00-000020A5A6B

ESN Barcode:

Model:

Motorola W385

Make:

IP Address: Effective Date:

MOT 06/26/2010

Bill Cycle:

Calling Plan:

Access Fee

\$.99 DAILY PLAN \$0.00

Activation Fee:

\$0.00

Long Distance Carrier: Calling Plan Contract Term:

EARLY TERMINATION FEE: \$0

VERIZON WIRELESS

MONTHLY

Contract End Date:

MONTHLY

Features and Services

Included Features:

48676 - INTERNATIONAL DIAL ALLOWED-\$0

65774 - PREPAY TEXT MESSAGING.

68869 - CALLER ID

68870 - BUSY TRANSFER

68871 - 3-WAY CALLING

68872 - CALL DELIVERY

68873 - CALL WAITING

68874 - NO ANSWER TRANSFER

68876 - CALL FORWARDING

68877 - BASIC VOICE MAIL - \$0

73520 - PREPAY MUSIC ON DEMAND

73665 - PREPAY MOBILE WEB MY ACCT

48526 - TXT MSG W PER MSG CHARGES

71886 - EVDO DATA TRANSPORT - \$0

71888 - 1X DATA TRANSPORT - \$0

73589 - \$.99 DAILY PLAN

Additional Services:

71885 - PREPAY PICTURE MESSAGING

I AGREE TO THE CURRENT VERIZON WIRELESS PREPAY CUSTOMER AGREEMENT (PCA), INCLUDING THE CALLING PLAN, WHICH WAS PRESENTED TO ME BY THE SALES REPRESENTATIVE AND WHICH I HAVE HAD THE OPPORTUNITY TO REVIEW. I UNDERSTAND THAT I AM AGREEING TO ALL TERMS, INCLUDING LIMITATIONS OF LIABILITY FOR SERVICE AND EQUIPMENT, SETTLEMENT OF DISPUTES BY ARBITRATION INSTEAD OF JURY TRIALS AND OTHER IMPORTANT TERMS IN THE PCA.

Agent/Sales Rep Information:

Agent-Name: Bash Wireless Corp

Agent Code: D520801

Customer Signature

Account Owner Name - KUTSOVA, IRINE

Account Owner Signature

v

I have verified Customer's ID/applicable auth. docs.

Sales Rep Name

Sales.Rep Signature

X

Visit www.VerizonWirelessSurvey.com to tell us about your experience.

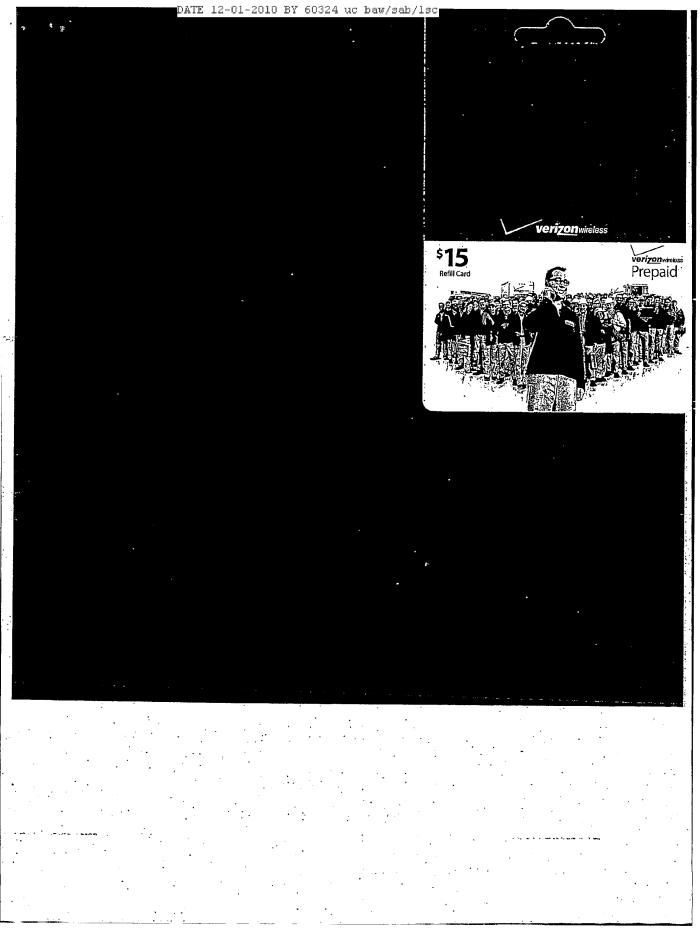




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\$15



No Value Until Activated At Regist

Purchase and use of this card constitutes your acceptance of the Terms and Conditions in the Vertron Wireless Prepaid Customer Agreement and Calling Plan, which you acknowledge you have received. Terms and Conditions are subject to change without notice. A Vertron Wireless Prepaid none number is required before this card can be added to an account. Balance expires 30 days from the date it is added to the account. Card is not refundable, returnable or exchangeable and has no cash value. Neither InComm® nor Vertron Wireless is responsible for lost or stolen cards. Service provided by Vertron Wireless.

Protytour calling Plan and Pricing Information (

- 1. My Yerizon On Your Phone* Press up on 4-way Directional Key:
- 2. Customer Service Call *611 (airlime free) from your wireless phone, or 1-888-294-6804.
- 3. Online www.verizonwireless.com/myverizon.

rola Waysilo Addynis Card

- .1. My Verizon on your phone*: Press up on 4-way Directional Key,
- Dial *611 from your wireless phone.
 When prompted, enter the PM number below.
- 3. Online www.verizonwireless.com/myverizon.
- 4. Send a text message with your PIN number to "VZPAY" (89729).
- 5. Mobile Breadband customers use this card to pay for a session through VZ Access Manager.
- * Mobile Web capable phone required,

- Mi Verizon en tu teléfono*: Oprime hacia arriba la tecla de 4 direcciones.
- Marca *611 desde tu teléfono móvil. Cuando sete pida, ingresa el número de identificación personal - PIN que aparece abajo.
- 3. Por Internet en www.verizonwireless.com/miverizon.
- Envía un mensaje de texto con tu número de identificación personal - PIN a "VZPAY" (89729).
- Clientes de Banda Ancha Movil: usen esta tarjeta parapagar por una sesión a través de VZ Access Manager.
- * Requiere teléfono capacitado para el servicio de Internet móvil Mobile Web,

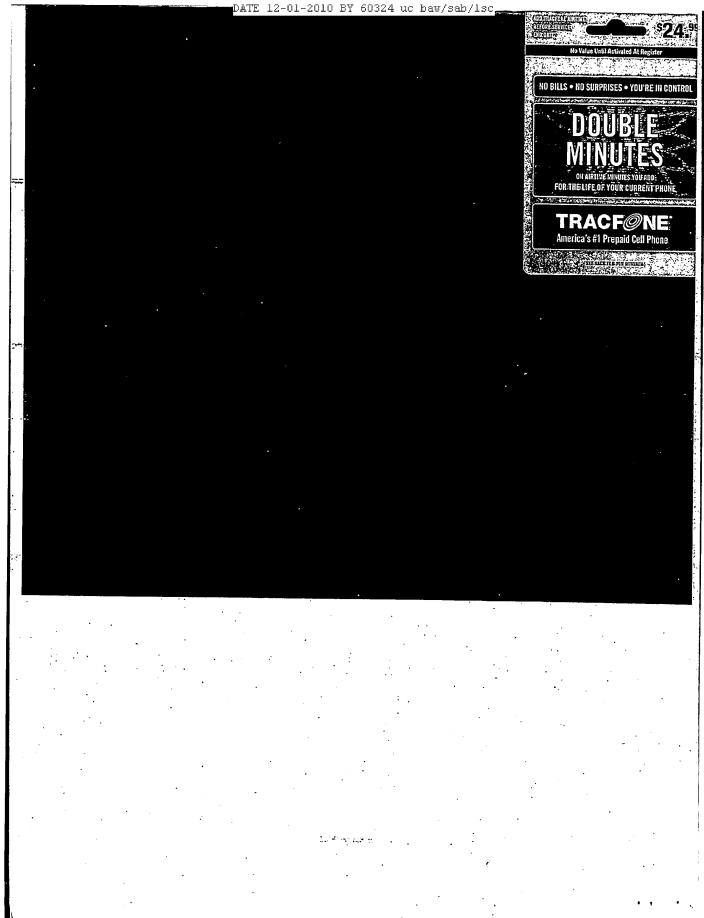
Fastcard® is a registered trademark of InComm®. Patent Pending.

Removing the scripts all cooling and activation of service considerer your acceptance of the Vermi Hirolass Presidence Agreement and Cadling Parameters and activation acceptance of the Cadling Parameters and activation acceptance of the Cadling Parameters and activate acceptance of the Cadling Parameters and acceptance

556 736 6618











No Value Until Activated At Register

Add this card to your current TracFone, or a new TracFone, and you'll get Double Minutes on any TracFone airtime card you add to the phone after that, for the life of that TracFone. Also applies to minutes included on One Year

How to Add This Card and Get Your Double Minute Benefit:

1. To get your Double Minute benefit, add this card before adding any other airtime card.

2. Scratch off the gray strip below to reveal the 15-digit PIN number.

3. Enter the 15-digit PIN number Into the ADD AIRTIME or REDEEM AIRTIME screen located in your TracFone's PREPAID menu, then press OK,

4. Or, add the PIN number, at the Add Airtime page at www.tracfone.com; or you may also call 1-800-867-7183.

Keep this card until you receive confirmation that the TracFone to which you have added the card now has the Double Minute benefit.

This is NOT an airtime card; it simply enables the Double Minute benefit on a single TracFone beginning with your next airtime card. This card alone does NOT add minutes/units to the airtime balance, or days to the Service End Dale/Clays Remaining, both of which are shown on your Tractions screen.

2. The Double Minute benefit does not apply to minutes that have not been purchased, such as bonus minutes.

provided with a special TracFone promotional code.

3. The Double Minute benefit only applies to one TracFone cell phone, and may not be transferred to another

Para utilizar esta tarjeta, ingress el PiN localizado debajo de la banda gris én esta tarjeta, directamente en su telélono seleccionendo la opción "Radeem airtime" o "Add Airtime" del menú "Prepaid". Guarde esta tarjeta hasta que reciba un mensale de téxito confirmando que ya tiene el privilegio de minutos dobies. También puede añadir esta tarjeta a su teléfono en www.tracfone.com/esp o Bamando al 1-800-867-7183.

The amount you paid for this card reduces our subsidy of the cost of your TracFone and enables you to buy minutes on this reduced rate plan. Purchase and use of this card is subject to the Terms and Condition's of Service and affirme rates in the phone package or at www.TracFone.com, which are subject to change without plor molice. The PIN number or hits card must be added to your TRACFONE prior to one year from date of card purchase, or it is void. The Double Minute benefit is associated with the Electronic Service in unber of the tracFone to which the PIN code is added and may not be transforred to enother.

Fastcard* is a registered trademark of InComm. Patent Pending.

For use only with TracFone phones.

Cards are non-refundable.

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