

Statement of the Case

The defendant, Mr. Michel is charged with two schemes to obtain illegal access to and influence with high-ranking officials in the United States government. First, Mr. Michel is charged with several offenses stemming from his alleged illegal political contributions on behalf of a foreign national, Low Taek Jho (“Jho Low”), into political committees supporting the reelection of former President of the United States Barack Obama in 2012. Mr. Michel is alleged to have moved Jho Low’s money through third parties, also known as conduits, and his own companies to conceal the foreign source of the funds. Michel is also alleged to have caused the filing of false reports with, and to have submitted his own false declaration to, the Federal Election Commission concealing Jho Low as the true source of the political contributions allegedly made by third parties at his direction and allegedly made by Mr. Michel through his own businesses. Mr. Michel is also alleged to have illegally attempted to discourage witnesses from cooperating with the government’s investigation into Michel’s making of illegal foreign and conduit political contributions.

Second, Mr. Michel is charged with several offenses relating to his alleged agreement to work with a politically connected individual in the United States on behalf of Jho Low in an attempt to influence former President of the United States Donald Trump and high-ranking individuals in his Administration to end a DOJ civil and criminal investigation into Jho Low, all while concealing that Mr. Michel and his co-conspirators were working on behalf of Jho Low. Mr. Michel is also alleged to have agreed to work with the same individuals on behalf of the People’s Republic of China (“PRC” or “China”) to influence former President Donald Trump and high-ranking members of his Administration to remove a Chinese dissident from the United States and send him back to China, also while concealing that Mr. Michel and his co-conspirators were

working on behalf of the PRC government. Mr. Michel is alleged to have received tens of millions of dollars for these influence efforts and to have failed to disclose his status as an agent of Jho Low and the People's Republic of China to the United States Department of Justice and the Attorney General. Mr. Michel is also alleged to have engaged in international financial transactions to promote the illegal influence efforts on behalf of Jho Low and to have engaged in domestic financial transactions for the purpose of concealing the true source, purpose, and control of the funds. Finally, Mr. Michel is alleged to have agreed to make false statements to financial institutions regarding the purpose and source of the transactions and funds used to pay for and further the illegal influence campaigns.

Respectfully submitted,

COREY R. AMUNDSON
Chief, Public Integrity Section
Criminal Division
U.S. Department of Justice

By: /s/ John D. Keller
John D. Keller
Principal Deputy Chief

Sean F. Mulryne
Director of Enforcement & Litigation
Election Crimes Branch

Nicole Lockhart
Trial Attorney
1301 New York Ave., NW
Washington, DC 20530
Telephone: 202-514-1412
Facsimile: 202-514-3003
john.keller2@usdoj.gov
sean.mulryne@usdoj.gov
nicole.lockhart@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will serve counsel for the Defendant via electronic notification.

Dated: September 30, 2022

/s/ John D. Keller
John D. Keller