

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 24-CR-
	:	
v.	:	VIOLATIONS:
	:	
BARRY P. BENNETT,	:	18 U.S.C. § 1001(a)(1) (Scheme to Falsify,
Defendant.	:	Conceal, and Cover up Material Facts
	:	from the Department of Justice’s FARA
	:	Unit)
	:	
	:	
	:	22 U.S.C. § 618(a)(2) (False Statements
	:	and Material Omissions in Filings Under
	:	the Foreign Agents Registration Act)

INFORMATION

The United States Attorney charges that, at all relevant times:

COUNT ONE

1. From on or about July 25, 2017, to on or about March 12, 2018, in the District of Columbia and elsewhere, the defendant,

BARRY P. BENNETT,

did knowingly and willfully falsify, conceal, and cover up by a trick, scheme, and device material facts in a matter within the jurisdiction of the Foreign Agents Registration Act (FARA) Unit, a component of the National Security Division of the Department of Justice, an agency of the executive branch of the government of the United States, by making and causing Avenue Strategies Global LLC (“Avenue Strategies”) to make, in FARA filings made by Avenue Strategies and BENNETT, false statements and material omissions regarding certain of Avenue Strategies’ registerable

activities and disbursements, and by failing to provide copies of disseminated informational materials to the FARA Unit.

(Scheme to Falsify, Conceal, and Cover up Material Facts from DOJ's FARA Unit, in violation of Title 18, United States Code, Section 1001(a)(1))

COUNT TWO

2. On or about March 2, 2018, in the District of Columbia and elsewhere, the defendant,

BARRY P. BENNETT,

knowingly and willfully caused to be made false statements of material fact in documents filed with and furnished to the Attorney General under the provisions of FARA and omitted material facts necessary to make the statements therein not misleading.

(False Statements and Material Omissions in Filings Under FARA, in violation of Title 22, United States Code, Sections 612 and 618(a)(2))

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/JOLIE F. ZIMMERMAN
JOLIE F. ZIMMERMAN
Assistant United States Attorney
D.C. Bar No. 465110
601 D Street, N.W.
Washington, D.C. 20530
(202) 252-7220
Jolie.Zimmerman@usdoj.gov

EVAN N. TURGEON
Deputy Chief, Counterintelligence and
Export Control Section
National Security Division

U.S. Department of Justice
D.C. Bar No. 1010816; MA Bar No. 675961
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
(202) 353-0176
evan.turgeon@usdoj.gov