

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 24-CR-
	:	
v.	:	VIOLATIONS:
	:	
DOUGLAS WATTS,	:	22 U.S.C. §§ 612(a) and 618(a)(1) (Acting
	:	as an Agent of a Foreign Principal Without
Defendant.	:	Registering Under the Foreign Agents
	:	Registration Act)
	:	
	:	18 U.S.C. § 1001(a)(2) (False Statements to
	:	the Federal Bureau of Investigation)

**INFORMATION**

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

**COUNT ONE**

1. From in or around August 2017, and continuing through in or around February 2018, in the District of Columbia and elsewhere, the defendant,

**DOUGLAS WATTS,**

did willfully act as an agent of a foreign principal without filing a registration statement as required under the Foreign Agents Registration Act, in violation of 22 U.S.C. §§ 612(a) and 618(a)(1).

**(Acting as an Unregistered Agent of a Foreign Principal,** in violation of Title 22, United States Code, Sections 612(a) and 618(a)(1))

**COUNT TWO**

2. On or about February 11, 2020, in the District of Columbia and elsewhere, the defendant,

**DOUGLAS WATTS,**

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the government of the United States, by telling an Federal Bureau of Investigation (FBI) Special Agent that: (1) WATTS was not sure why Avenue Strategies created Company A to do this work and did not do the work itself; (2) WATTS did not know Company A was beneficial to BENNETT's foreign clients; and (3) BENNETT did not tie Company A to Country A, which statements and representations WATTS then and there knew to be false.

**(False Statement or Representation Made to a Department or Agency of the United States, in violation of Title 18, United States Code, Sections 1001(a)(2))**

**COUNT THREE**

3. On or about February 27, 2020, in the District of Columbia and elsewhere, the defendant,

**DOUGLAS WATTS,**

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the government of the United States, by telling an FBI special agent that (1) WATTS did not believe that Company A was created to benefit or support Avenue Strategies' contract with Country A; (2) BENNETT never told WATTS that Company A was being operated on behalf of Country A; and (3) all of Company A's efforts were for humanitarian awareness purposes, which statements and representations WATTS then and there knew to be false.

**(False Statement or Representation Made to a Department or Agency of the United States, in violation of Title 18, United States Code, Sections 1001(a)(2))**

Respectfully submitted,

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