

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Case No.: \_\_\_\_\_

UNITED STATES of AMERICA,	)	
	)	
Plaintiff,	)	<b>INFORMATION</b>
	)	
v.	)	(18 U.S.C. § 793(e))
	)	
TERRY J. ALBURY,	)	
	)	
Defendant.	)	

The Assistant Attorney General for National Security charges:

**COUNT ONE**

(Unauthorized Disclosure of National Defense Information)

1. From in or about February 2016 through on or about January 31, 2017, in the District of Minnesota and elsewhere, the defendant, TERRY J. ALBURY, having unauthorized possession of, access to and control over documents and information relating to the national defense, to wit: a document pertaining to assessing Confidential Human Sources dated August 17, 2011, and an undated document relating to threats posed by certain individuals from a particular Middle Eastern country, did knowingly and willfully communicate, deliver, and transmit those aforesaid documents and information to a person not entitled to receive it, to wit, a reporter for a national media organization, in violation of Title 18, United States Code, Section 793(e).

**COUNT TWO**

(Unauthorized Retention of National Defense Information)

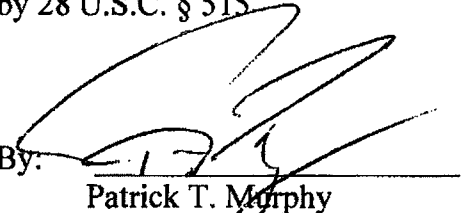
2. From on or about April 7, 2017, to on or about August 28, 2017, the defendant, TERRY J. ALBURY, having unauthorized possession of, access to, and control over documents relating to the national defense, to wit: a document relating to the use of an online platform for recruitment by a specific terrorist group, did willfully retain the documents and fail to deliver them to an officer and employee of the United States entitled to receive it, in violation of Title 18, United States Code, Section 793(e).

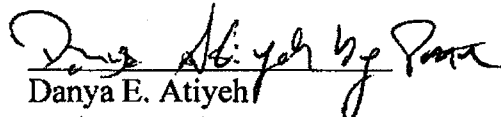
Respectfully Submitted,

JOHN C. DEMERS  
Assistant Attorney General  
for National Security  
Attorney for the United States,  
Acting Under Authority Conferred  
by 28 U.S.C. § 515

JEFFERSON B. SESSIONS III  
United States Attorney General

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By:   
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Special Assistant to the Attorney General