

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MAY 22 2019

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 TURAB LOOKMAN,)
)
 Defendant.)

CRIMINAL NO. 19-1439WJ
Counts 1-3: 18 U.S.C. § 1001(a)(2): False
Statement.

INDICTMENT

The Grand Jury charges:

Count 1

On or about November 14, 2017, in Los Alamos County, in the District of New Mexico, the defendant, **TURAB LOOKMAN**, in a matter within the jurisdiction of the Department of Energy, an agency within the executive branch of the United States, did knowingly and willfully make and cause to be made a materially false, fictitious and fraudulent statement and representation, knowing such statement and representation to be false, fictitious and fraudulent, by answering “No” to the question posed to him through the Electronic Questionnaires for Investigations Processing (e-QIP), “Has any foreign national in the last seven (7) years offered you a job, asked you to work as a consultant, or consider employment with them?” The statement and representation were false because, as the defendant, **TURAB LOOKMAN**, then and there well knew, a foreign national had during the relevant period asked him to apply for and participate in China’s Thousand Talents Program for personal compensation.

In violation of 18 U.S.C. § 1001(a)(2).

Count 2

On or about June 6, 2018, in Los Alamos County, in the District of New Mexico, the defendant, **TURAB LOOKMAN**, in a matter within the jurisdiction of the Department of Energy, an agency within the executive branch of the United States, did knowingly and willfully make and cause to be made a materially false, fictitious and fraudulent statement and representation, knowing such statement and representation to be false, fictitious and fraudulent, by answering “No” to a question posed to him by a Los Alamos National Laboratory Counterintelligence Officer, “Have you ever been recruited by or applied for a job (for personal compensation), either full or part-time, as a consultant/academic/collaborator/ adjunct, underwritten by the PRC and/or the Thousand Talents Program, or any company or university within China?” The statement and representation were false because, as the defendant, **TURAB LOOKMAN**, then and there well knew, he had been recruited by, applied for, and been accepted to participate in China’s Thousand Talents Program for personal compensation.

In violation of 18 U.S.C. § 1001(a)(2).

Count 3

On or about September 13, 2018, in Los Alamos County, in the District of New Mexico, the defendant, **TURAB LOOKMAN**, in a matter within the jurisdiction of the Department of Energy, an agency within the executive branch of the United States, did knowingly and willfully make and cause to be made a materially false, fictitious and fraudulent statement and representation, knowing such statement and representation to be false, fictitious and fraudulent, by answering “No” to a question posed to him by a Special Agent with the National Background Investigation Bureau/Office of Personnel Management, as to whether he had been offered a job by any foreign national or entity within the last 7 years, or if any foreign entity had asked him to

consider employment with them, or whether he had been involved in any other business ventures or activities with any foreign entity within the last 7 years. The statement and representation were false because, as the defendant, **TURAB LOOKMAN**, then and there well knew, he had been recruited by, applied for, and been accepted to participate in China's Thousand Talents Program for personal compensation.

In violation of 18 U.S.C. § 1001(a)(2).

A TRUE BILL:

/s/ _____
FOREPERSON OF THE GRAND JURY

ccclmanly
Assistant United States Attorney

JM

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