



INEFFECTIVE ASSISTANCE OF COUNSEL.

COUNSEL FAILED TO FILE MOTIONS TO ENSURE THAT I WAS COMPETENT TO KNOWINGLY AND VOLUNTARILY ENTER A PLEA AND DEFEND MY INNOCENCE. I TOLD MY COUNSEL THAT I WAS SUFFERING MENTAL ILLNESS ALTHOUGH I DID NOT KNOW THE SPECIFIC PATHOLOGIES NOR DID I KNOW HOW IT WAS DEGRADING MY THINKING AND DEBILITATING MY DEFENSE. I TOLD COUNSEL I HAD A FAMILY HISTORY OF MENTAL ILLNESS AND HAD NUMEROUS DELUSIONS INCLUDING THE ONES WHICH MADE THE INCULPATORY CLAIMS. LIKE MANY SUCCESSFUL PEOPLE, I WAS EXCELLENT AT CONCEALING MY MENTAL ILLNESS THROUGHOUT MY LIFE, WHICH CAUSED COUNSEL TO ERRONEOUSLY BELIEVE THAT I WAS COMPETENT. THE COVID RESTRICTIONS WHICH PREVENTED PHYSICAL ACCESS TO COUNSEL CONTRIBUTED TO MY COUNSEL BEING ~~UN~~<sup>OBVIOUS</sup> OF MY MENTAL DEGRADATION.

I WAS MADE TO ENTER THE GUILTY PLEA BEFORE I WAS ALLOWED TO BEGIN A PSYCHOLOGICAL ASSESSMENT WITH THE DEFENSE PSYCHIATRIST, DR. DAVID CHARNEY, AND BEFORE I WAS ALLOWED TO RECEIVE TREATMENT. DR. CHARNEY DIAGNOSED ME WITH NUMEROUS MENTAL PATHOLOGIES, THE MOST SERIOUS BEING BIPOLAR DISORDER WHICH RENDERED ME INCOMPETENT. DR. CHARNEY DID NOT ASSESS MY COMPETENCY, NOR DID HE TREAT OR ADVISE TREATMENT FOR MENTAL ILLNESS. HE ONLY CONDUCTED AN ASSESSMENT. COUNSEL DID NOT FILE A MOTION TO ALLOW DR. CHARNEY TO CONDUCT HIS ASSESSMENT PRIOR TO THE PLEA. NOR DID COUNSEL FILE A MOTION TO ALLOW FOR TREATMENT PRIOR TO THE PLEA OR SENTENCING.

NOR DID COUNSEL PROVIDE TRANSCRIPTS OF THE FBI INTERROGATIONS TO DR. CHARNEY, WHICH HE REQUESTED. THE TRANSCRIPTS SHOW EVIDENCE OF MENTAL INSTABILITY SUCH AS MY BELIEF THAT RUSSIA WAS DEMONICALLY POSSESSED, DISCUSSIONS OF ESOTERIC TOPICS, AND BELIEF THAT RUSSIAN INTELLIGENCE AND SECURITY SERVICES (RUSS) WERE TARGETING ME AND I NEEDED PROTECTION.

COUNSEL RECEIVED DR. CHARNEY'S FIRST ASSESSMENT IN FEBRUARY 2021 AND DID NOT PROVIDE ME A COPY TO ALLOW ME TO SEEK TREATMENT. NOR DID COUNSEL ADVISE ME TO SEEK TREATMENT. IN FACT COUNSEL ADVISED ME NOT TO TELL THE COUNTY JAIL PSYCHOLOGIST THAT I HAD PSYCHOSES. WHEN I SOUGHT TREATMENT FOR ANXIETY, I WAS ALSO UNAWARE OF NUMEROUS PSYCHOSES BECAUSE I ATTRIBUTED THE SYMPTOMS TO DEMONIC ENTITIES TORMENTING ME.

THE GOVERNMENT DID NOT PERFORM THEIR OWN PSYCHOLOGICAL ASSESSMENT. I DID NOT RECEIVE DR. CHARNEY'S ASSESSMENT UNTIL MAY 11, 2021 - THREE DAYS BEFORE SENTENCING. WITH THE ASSESSMENT I WAS FINALLY ABLE TO SEEK TREATMENT. ON MAY 26, 2021 I BEGAN TO RECEIVE <sup>RISPERDAL</sup> ~~RISPERDAL~~ AN ANTI-PSYCHOTIC MEDICATION USED TO TREAT DELUSIONS, AS WELL AS TREAT SCHIZOPHRENIA.

RISPERDAL STABILIZED MY MENTAL CONDITION, AND MADE ME MORE AWARE OF AND MITIGATED THE NUMEROUS DELUSIONS I WAS SUFFERING FROM, INCLUDING THE ONES WHICH PRODUCED THE INCULPATORY CLAIMS. IN ADDITION SINCE DECEMBER 22, 2021 I HAD BEEN TAKING PROZAC WHICH HAS MITIGATED UNDERLYING DEPRESSION AND ANXIETY WHICH ALSO DEGRADED MY COMPETENCY AND CONTRIBUTED TO MY PSYCHOSIS. THIS ANXIETY AND PSYCHOSIS EXPLAIN WHY I FAILED THE OCTOBER 2019 FBI POLYGRAPH TO ASSESS NO POST-2011 CONTACT WITH RISS.

SO WHY DID I PLEA GUILTY AND WRITE AN EXTENSIVE LETTER IN FEBRUARY 2021 TO JUDGE HILTON EXPLAINING MY ACTIONS? SINCE MY STATEMENTS TO THE FBI WERE NOT SUPPRESSED AND KNOWING I HAD NO COMPETENCY AND ABILITY TO DEFEND MYSELF DUE TO MENTAL ILLNESS, THE ONLY OPTIONS PRESENTED BY COUNSEL WERE TO EITHER PLEAD GUILTY AND HOPE FOR LENIENCY OR FACE A 30 YEAR SENTENCE PER THE UNITED STATES SENTENCING GUIDELINES.

## GROUND ONE CONTINUATION SHEET

IN ADDITION I WAS SUFFERING FROM DELUSIONS THROUGHOUT THE PRE-SENTENCING PERIOD WHILE IN DETENTION. ONE BEING THAT GOD WAS SMITING ME FOR SPIRITUAL MISDEEDS AND IMAGINED AND ACTUAL FAILINGS. AS A RESULT I MADE NO EFFORT TO DEFEND MYSELF. NOR DID I HAVE KNOWLEDGE OF THE LAW SUFFICIENT TO DEFEND MYSELF.

IN MY LETTER WHICH I WROTE WHILE NOT UNDER MEDICATION OR TREATMENT I ATTEMPTED TO CONVEY THAT I WAS INCOMPETENT WHEN I MADE THE CLAIMS TO THE FBI AND THAT THE INCULPATORY CLAIMS WERE FALSE. MY LETTER WAS INCORRECT WHEN I CLAIMED THAT I FREELY MADE THE CLAIMS TO THE FBI. I DIDN'T COMPREHEND THAT I WAS COERCED EVEN THOUGH I WASN'T IN CUSTODY. MY LETTER REVEALED THE EXTENT OF MY PERSECUTORY DELUSIONS (PARANOIA) OF BEING TARGETED BY RISS. I WAS INCORRECT WHEN I WROTE THAT I SHOULD HAVE SOUGHT TREATMENT FOR MENTAL ILLNESS EARLIER IN LIFE. UNFORTUNATELY, ONE DOESN'T RECOGNIZE WHEN ONE IS DERANGED. IT TAKES OUTSIDE INTERVENTION.

I BELIEVED THAT ACCEPTING RESPONSIBILITY FOR THE FALSE CLAIMS WAS THE ONLY WAY TO GET HOME. WHEN ONE IS ISOLATED, UNKNOWING OF RIGHTS AND THE LAW, AND SUFFERING UNTREATED MENTAL ILLNESS, ONE BELIEVES THAT ONE IS FORCED TO CHOOSE BETWEEN A BAD CHOICE AND A WORSE CHOICE. WERE I TREATED FOR MENTAL ILLNESS I WOULD HAVE BEEN COMPETENT TO DEFEND MY INNOCENCE THROUGH SUPPRESSION OF STATEMENTS AND EVIDENCE, AND INVOKING THE TRUSTWORTHINESS DOCTRINE.

~~I REQUEST THIS COURT TO VACATE THE GUILTY PLEA.~~

GROUND TWO CONSPIRACY

INEFFECTIVE ASSISTANCE OF COUNSEL.

COUNSEL FAILED TO FILE A MOTION TO SUPPRESS MY STATEMENTS, WITHOUT THE STATEMENT MADE TO THE FBI THERE ARE NO GROUNDS AGAINST ME. GIVEN THE TOTALITY OF THE CIRCUMSTANCES, I DID NOT MAKE THE CLAIMS KNOWINGLY AND WILLINGLY. A COMBINATION OF THE PRESSURES OF MY UNTREATED MENTAL ILLNESS, ECONOMIC COERCION, THE FBI'S POWER OF AUTHORITY, AND A WORKPLACE POLYGRAPH CREATED THE CONDITIONS IN WHICH MY FREE WILL WAS OVERBORNE AND I WAS COERCED INTO MAKING AN INVOLUNTARY AND FALSE CONFESSIO.

HOW DID I MAKE THESE CLAIMS? IN JULY 2019 I HAD TO TAKE A PERIODIC POLYGRAPH WITH MY CONTRACT CLIENT, THE DEFENSE INTELLIGENCE AGENCY (DIA). THIS WAS NECESSARY FOR MY CONTINUED EMPLOYMENT, WHICH NEGATED MY FREE WILL. THE POLYGRAPH IS IN AND OF ITSELF A STRESS INDUCING EXERCISE. I WANTED TO PASS THE POLYGRAPH BUT WAS SUFFERING MENTAL ILLNESS AND BELIEVED THAT TELLING MY DELUSIONAL CLAIMS WOULD CALM ME, ALLOWING ME TO PASS — CLEARLY SHOWING A LACK OF ~~KNOWINGNESS~~ KNOWINGNESS.

HOW DID THESE DELUSIONS COME ABOUT? WHEN ONE IS SUFFERING UNTREATED MENTAL ILLNESS REASON AND LOGIC ARE SEVERELY ATTENUATED. MY BEST UNDERSTANDING IS THAT PSYCHOSIS CAUSED ME TO BELIEVE THAT I BETRAYED MY FAITH, OUR COUNTRY, MY MEN, AND MY MISSION, AND DEPRESSION CAUSED ME TO OBSESS OVER THESE DELUSIONS AND OTHER IMAGINED FAILINGS. HOWEVER, PSYCHOSIS AND DEPRESSION DID NOT COMPEL ME TO CONFESS. ~~IF~~ I WAS COMPELLED BY A WORKPLACE POLYGRAPH. MENTAL ILLNESS <sup>WITH GOVERNMENT COERCION</sup> NEGATED MY KNOWLEDGE AND FREE WILL RENDERING MY CONFESSIO AS INVOLUNTARY.

MY PSYCHOSIS WHICH DRAMATICALLY WORSEMED AFTER 2014 CAUSED OBSCURE MEMORIES OF DRUNKEN MEETINGS WITH INNOCULOUS RUSSIANS TO MORPH INTO ENCOUNTERS WITH RISS IN WHICH I TOLD NATIONAL DEFENSE INFORMATION AND MADE DECLARATIONS OF



GROUND TWO CONTINUATION SHEET

LOYALTY TO THE RUSSIAN STATE. WHEN YOU HAVE A CHEMICAL IMBALANCE YOUR MIND PLAYS TRICKS ON YOU. MY UNHEALTHY MIND WAS FERTILE GROUNDS FOR SUCH DELUSIONS TO EMERGE BECAUSE I TRAVELED EXTENSIVELY IN RUSSIA AND ENGAGED IN NUMEROUS SOCIAL INTERACTIONS, AND ACQUIRED VAST KNOWLEDGE OF INTELLIGENCE OPERATIONS SINCE 2011.

THE DIA WAS ACTING AS A PRIVATE PARTY AS AN AGENT OF THE GOVERNMENT. IT IS A GOVERNMENT AGENCY AND IT DIRECTED ME TO SPEAK WITH THE FBI. ~~THE DIA~~ I HAD THE ADDED COERCION OF BELIEVING I WAS UNDER ORDERS TO PROVIDE THE CLAIMS TO THE FBI. THE DIA CONTACTED THE FBI AND THE FBI CAME TO THE DIA OFFICES TO INTERROGATE ME, CAUSING ME TO BELIEVE THE FBI AND THE DIA WERE WORKING IN TANDEM. THE DIA AGENT TOLD ME NOT TO HIDE ANYTHING, SUCH AS EMAILS AND I ALSO UNDERSTOOD <sup>THIS</sup> TO MEAN NOT TO WITHHOLD ANY CLAIMS FROM THE FBI. SINCE I BELIEVED THAT THE DIA SHARED MY CLAIMS WITH THE FBI I FELT COERCED INTO REPEATING THOSE CLAIMS TO THE FBI. I FEARED THAT IF MY CLAIMS DID NOT MATCH THOSE THE FBI WOULD MAKE MY LIFE DIFFICULT TO INCLUDE POSSIBLE ARREST OR NEGATIVELY REPORTING TO THE DIA HINDERING MY CLEARANCE — A FORM OF ECONOMIC COERCION. DURING THESE INTERROGATIONS THE FBI DID NOT READ ME THE MIRANDA WARNING SO I WAS UNKNOWING OF THE LEGAL SITUATION I WAS IN. THE FBI TOLD ME THEY WANTED TO KNOW WHAT HAPPENED AND WHAT RISS ACTIVITIES WERE. SINCE BOTH DIA AND FBI HAVE A COUNTER-INTELLIGENCE MISSION I BELIEVED THE INTERROGATIONS WERE JOINT. IN FACT DURING ONE OF THE INTERROGATIONS I TOLD THE FBI TO READ THE WRITTEN CLAIMS I GAVE TO THE DIA SINCE IT WAS DIFFICULT FOR ME TO REMEMBER WHAT I ORIGINALLY TOLD THE DIA. COUNSEL INCORRECTLY TOLD ME THAT MY STATEMENTS WERE VOLUNTARY SINCE I WASN'T IN CUSTODY.

GREENLAND TWO CONTINUATION SHEET

THE ONLY TIME THE FBI READ ME A MIRANDA WARNING WAS AT THE OCTOBER 2019 FBI POLYGRAPH WHICH I BELIEVE DID NOT PRODUCE INCULPATORY CLAIMS. THE POLYGRAPH ASSESSED IF I WAS CREDIBLE WHEN I CLAIMED NO POST-2011 RISS CONTACT. THIS POLYGRAPH WAS TAKEN INVOLUNTARILY. SINCE I UNDERSTOOD THAT THE DIA REQUIRED THE FBI INVESTIGATION FOR MY CLEARANCE HENCE MY EMPLOYMENT I WAS COERCED TO FULLY COOPERATE WITH THE FBI, SO I ANSWERED EVERY QUESTION AND AGREED TO EVERY REQUEST. I FEARED THAT FAILURE TO FULLY COOPERATE WOULD RESULT IN NEGATIVE ACTION. THE FBI QUICKLY INFORMED THE UNITED KINGDOM (UK) HOME OFFICE OF MY CASE AND THE HOME OFFICE EXECUTED A SEARCH WARRANT OF MY HOUSEHOLD AND MADE THREATENING STATEMENT TO MY WIFE. THE UK HOME OFFICE BARRED MY TRAVEL TO THE UK SO I COULD NOT BE WITH MY FAMILY. THE FBI ASKED ME TO SURRENDER MY PASSPORTS AND DELAYED IN RETURNING THEM TO ME WHEN I ASKED FOR THEM. UNDER THIS COERCION WITH MY MENTAL ILLNESS I WAS COMPELLED TO ANSWER EVERY QUESTION, AGREE TO ANY REQUEST, AND SHARE MY CLAIMS.

THE FBI REPEATEDLY SAID THAT THEIR INVESTIGATION HAD NOTHING TO DO WITH MY CLEARANCE YET THE DIA SUSPENDED MY CLEARANCE TELLING ME THEY COULD NOT RESTORE IT UNTIL THE FBI COMPLETED THEIR PROCESS AND THEIR FINDINGS SUBMITTED TO THE DIA. I REPEATEDLY ASKED THE FBI WHAT I NEEDED TO PROVIDE SO THEY COULD COMPLETE THEIR PROCESS. THE INTERROGATIONS WERE NUMEROUS ADDING TO THE COERCION. I WAS OBLIVIOUS TO THE LEGAL RAMIFICATIONS OF MAKING THESE CLAIMS, FURTHER ATTESTING TO MY MENTAL DEGRADATION. SINCE I WAS EXPECTING TO COMPLETE THE DIA CLEARANCE PROCESS WITH A DIA POLYGRAPH I WAS SUFFERING ANXIETY IN ANTICIPATION AND WAS COERCED TO UNLASH ANY POSSIBLE CLAIMS TO THE FBI EVEN IF UNTRUE AND MADE INVOLUNTARILY.

~~I REQUEST THIS COURT TO VACATE THE GUILTY PLEA.~~

INEFFECTIVE ASSISTANCE OF COUNSEL.

(a) COUNSEL FAILED TO SUPPRESS STATEMENTS OF A COLLEAGUE, BECAUSE I WAS COERCED INTO MAKING THE CLAIMS TO THE DIA. I WAS REMOVED FROM MY WORK CONTRACT AND <sup>THE</sup> A CONTRACT COLLEAGUE ASKED ME TO PROVIDE AN EXPLANATION IN JULY 2019. AT THAT POINT I WAS UNDER NUMEROUS FORMS OF COERCION FROM THE GOVERNMENT SUCH AS REPEATED INTERROGATIONS, LOSS OF EMPLOYMENT, SUBJECTION TO SEARCH WARRANTS, AND BAR FROM TRAVELING TO THE UK TO BE WITH MY FAMILY, THAT I WAS COERCED INTO TELLING THE COLLEAGUE SOME CLAIMS. I WAS CERTAIN THAT THE FBI WOULD INTERROGATE THIS COLLEAGUE AND WOULD ADVERSELY IMPACT THE COLLEAGUE IF THE COLLEAGUE DID NOT PRODUCE SOME CLAIMS. IN ADDITION I BELIEVED THAT IF THE COLLEAGUE PRODUCED SOME CLAIMS THAT THE FBI WOULD CONSIDER ME MORE FAVORABLY AND END THE COERCION. THE COLLEAGUE WAS A PRIVATE PARTY ACTING ON BEHALF OF THE GOVERNMENT. NONE OF THE INCULPATORY CLAIMS TOLD TO THE COLLEAGUE HAVE <sup>COOPERATING</sup> ~~INDEPENDENT~~ EVIDENCE AND ARE UNTRUSTWORTHY. THE FBI DETERMINED TO INTERROGATE THE COLLEAGUE ONLY AFTER COERCING CLAIMS FROM ME.

(b) DIRECT APPEAL OF GROUND FIVE

(1) IF YOU APPEALED FROM THE JUDGMENT OF CONVICTION, DID YOU RAISE THE ISSUE?

YES  NO

(2) IF YOU DID NOT RAISE THIS ISSUE IN YOUR DIRECT APPEAL, EXPLAIN WHY:  
I WAS SUFFERING UNTREATED MENTAL ILLNESS AND HAD INSUFFICIENT KNOWLEDGE OF THE LAW.

(c) POST CONVICTION PROCEEDINGS:

(1) DID YOU RAISE THIS ISSUE IN ANY POST-CONVICTION MOTION, PETITION, OR APPLICATION  
YES  NO

GROUND SIX CONTINUATION SHEET

INEFFECTIVE ASSISTANCE OF COUNSEL.

COUNSEL DID NOT FILE A MOTION INVOKING THE TRUSTWORTHINESS DOCTRINE TO DISMISS THE CHARGE. THE GOVERNMENT HAS NOT PRODUCED INDEPENDENT EVIDENCE OF CORPUS DELICTI, EXCLUDING THE CONFESSION.

I HAVE PROVEN THAT I WAS SUFFERING MENTAL ILLNESS. THE INCUHPATORY CLAIMS ARE PRODUCT OF PSYCHOSIS AND DEPRESSION, NOT REALITY. THE MOST SERIOUS MENTAL ILLNESS WAS BIPOLAR DISORDER. I WAS NOT DIAGNOSED WITH BIPOLAR DISORDER EARLIER BECAUSE IT IS A PROGRESSIVE DISEASE WHICH UNTREATED WILL WORSEN. HALF OF ALL BIPOLAR CASES LEAD TO PSYCHOSIS WHICH CAN CAUSE MADDENING DELUSION SUCH AS BELIEVING ONE WAS RUSSIAN SPY WHO WAS ANTI-AMERICAN AND PRO-RUSSIAN.

THE REALITY OF MY LIFE HAS BEEN CONTRARY TO THE DELUSIONAL INCUHPATORY CLAIMS AS ATTESTED BY THE NUMEROUS CHARACTER REFERENCES SUBMITTED AT SENTENCING. I WILL PRESENT THE "INDEPENDENT EVIDENCE" THE GOVERNMENT HAS PROVIDED ME AND SHOW HOW MANY ARE COUNTER INDICATIVE OF A CONSPIRACY AND ~~I WILL PRESENT HOW MY DELUSIONS LACK CREDIBILITY~~

ALLOW ME TO LAYOUT THE "INDEPENDENT EVIDENCE" PRESENTED BY THE GOVERNMENT MUCH OF WHICH WAS OBTAINED THROUGH A COERCED AND INVOLUNTARY CONFESSION AND SUBSEQUENT SEARCH WARRANTS. NOTE THAT NONE SHOW EVIDENCE OF CORPUS DELICTI, NONE SHOW A CONSPIRACY. NONE SHOW THAT I KNOWINGLY MET WITH RISS. NONE SHOW THAT I DISCLOSED NATIONAL DEFENSE INFORMATION WITH MALICIOUS INTENT. AND NONE SHOW THAT I HAD AN AFFINITY TO THE RUSSIAN STATE AND ANTI-PATHY TOWARDS THE UNITED STATES AND HER ARMED FORCES.

THE "VOLUMINOUS" DISCOVERY IS IMMATERIAL TO THE CASE. MOST OF IT ARE IMAGES OF MY ELECTRONIC MEDIA, WHICH SHOWED NO EVIDENCE OF A CONSPIRACY.



## GROUND SIX (CONTINUATION SHEET)

- 1) I SERVED IN THE UNITED STATES (US) ARMY, HAD A CLEARANCE, AND HAD KNOWLEDGE OF NATIONAL DEFENSE INFORMATION
- 2) I TRAVELLED TO RUSSIA BETWEEN 1994 AND 2010.
- 3) I HAD CONTACT WITH RUSSIAN NATIONALS.
- 4) MY FATHER-IN-LAW WAS IN THE RUSSIAN MILITARY.
- 5) MY BROTHER-IN-LAW WAS IN THE RUSSIAN MILITARY.
- 6) A PHOTOGRAPH SHOWING ME IN THE RUSSIAN CITY SAMARA.
- 7) A PHOTOGRAPH OF ME AT A CAFE TABLE WITH A RUSSIAN NATIONAL
- 8) A BOTTLE OF COGNAC
- 9) EMAILS WITH AN INDIVIDUAL WHO HAD AN EMAIL ADDRESS WITH THE NAME OF THE RUSSIAN CITY AND REGION OF SARATOV. OUR CORRESPONDENCES DATED BETWEEN 2009 AND 2010 DISCUSS COMMERCIAL BUSINESS, OFFER TO PAY FOR TRAVEL, AND SCHEDULING A MEETING.
- 10) EMAILS WITH A VADYIM MALBEU DATED BETWEEN SEPTEMBER 2010 AND JANUARY 2011 DISCUSSING A LOGISTICS PROJECT, PASSING A GREETING FROM IVAN, AND INFORMING VADYIM OF MY MOVE TO WASHINGTON, DC.
- 11) EMAILS TO PEOPLE I KNEW WHO WERE AFFILIATED WITH THE US GOVERNMENT GIVING A PRESENTATION OF THE SAID LOGISTICS PROJECT.
- 12) I HAD A TRANSIT ENTRY STAMP FOR UKRAINE IN 1996 IN MY PASSPORT.
- 13) I WAS RELIEVED OF COMMAND AND HAD CLEARANCE SUSPENDED IN 2005.
- 14) I COMPLETED AN SF86 IN 2008 FOR A CLEARANCE.
- 15) I CONTACTED A RECRUITER IN 2008 ABOUT THE POSSIBILITY OF JOINING THE US ARMY RESERVES.
- 16) IN JANUARY 2010 I RECEIVED A LETTER FROM A CLEARANCE ADJUDICATOR TO CEASE AND REPORT ANY RUSSIAN CONTACTS.
- 17) I MOVED TO THE WASHINGTON DC AREA AT THE END OF 2010.
- 18) I HAD ARMY FIELD MANUALS IN MY POSSESSION.
- 19) I APPLIED TO THE CIA AT THE END OF 2010
- 20) I WENT INTO SPECIAL FORCES.

GROUND SIX CONTINUATION SHEET

21) MY MOTHER IS FROM THE FORMER SOVIET UNION

22) MY WIFE ~~AM~~ IS A DUAL US/RUSSIAN NATIONAL.

23) MY CHILDREN ARE DUAL US/RUSSIAN NATIONALS.

24) I WAS GIVEN INFORMATION ON SAID LOGISTICS PROJECT IN 2010.

25) PHOTOGRAPHS OF ME IN A RUSSIAN MILITARY UNIFORMS

26) I HAD RUSSIAN MILITARY PATCHES.

27) I HAD NO REPORTED CONTACT WITH RISS THROUGHOUT MY TRAVELS.

IF I HAD ACCESS TO DISCOVERY I COULD HAVE MADE A COMPLETE LIST.

AN UNHEALTHY MIND WHICH I HAD WAS ABLE TO PERVERT THESE FACTS INTO THE DELUSIONS I HAD OF BEING IN A CONSPIRACY.

HAD I A HEALTHY MIND I WOULD HAVE LOOKED AT THESE FACTS AND SEEN AN AMERICAN EARNEST TO BE AN ASSET TO HIS COUNTRY BUT WAS HINDERED BY MENTAL ILLNESS AND ON OCCASIONS ACTED IRRATICALLY.

I WILL PRESENT HOW THESE "INDEPENDENT EVIDENCES" ARE INMUTUOUS OR INDICATE ACTIVITIES OR MOTIVES CONTRARY TO A CONSPIRACY.

1) SERVED IN ARMY, HAD CLEARANCE, AND HAD KNOWLEDGE OF DEFENSE ~~INFORM~~ INFORMATION

- I JOINED IN 1994 PRIOR TO THE PERIOD OF THE ALLEGED CONSPIRACY FOR MOTIVES OF PATRIOTISM, SELF-IMPROVEMENT, AND ADVENTURE

- NOT EVIDENCE OF CORPUS DELICTI

2) TRAVELLED TO RUSSIA BETWEEN 1994 AND 2010

- I WAS MOTIVATED BY A PERSONAL GOAL BASED ON FAMILIAL HISTORY TO BRING LIBERAL, DEMOCRATIC CHANGE TO RUSSIA

- ALL TRAVEL WAS AUTHORIZED AND REPORTED

GROUND SIX CONTINUATION SHEET

3) HAD CONTACT WITH RUSSIAN NATIONALS

- REPORTED "CLOSE OR CONTINUOUS" CONTACTS (STANDARD FOR REPORTING)

4) FATHER-IN-LAW WAS RUSSIAN MILITARY

- RETIRED IN 1997 PRIOR TO MY MARRIAGE

- IN ONE CLEARANCE INTERVIEW SAID HE WAS RETIRED MILITARY, AT ANOTHER INTERVIEW SAID I LIVED WITH HIM WHILE HE WAS ACTIVE DUTY.

5) BROTHER-IN-LAW WAS RUSSIAN MILITARY

- HE LEFT ACTIVE SERVICE IN EARLY 2000S (I BELIEVE)

- I DON'T REMEMBER WHAT I TOLD ABOUT HIM AT CLEARANCE INTERVIEWS

- ONLY HAD INFREQUENT CONTACT WITH HIM

6) PHOTOGRAPH IN SAMARA

- NOT EVIDENCE OF CORPUS DELICTI

7) PHOTOGRAPH WITH RUSSIAN NATIONAL AT CAFE

- IF HE WERE RISS HE WOULD HAVE AVOIDED BEING PHOTOGRAPHED ESPECIALLY THAT EARLY IN THE CLAIMED CONSPIRACY.

8) BOTTLE OF COGNAC

- NOT EVIDENCE OF CORPUS DELICTI

~~4) CONTACTS WITH THEM~~

GROUND SIX CONTINUATION SHEET

9) EMAILS WITH IVAN

THE SPORADIC CONTACT WITH IVAN IN 2009 AND 2010 SHOW THE RELATIONSHIP WAS NOT NEFARIOUS. I FIRST MET WITH IVAN IN AUGUST 2008. WE DID NOT CORRESPOND FOR NEARLY FIFTY MONTHS. HE INITIATED EMAIL CONTACT WITH ME IN APRIL 2009 — CLEARLY SHOWING THE LACK OF AN ESTABLISHED RELATIONSHIP ~~AND~~ OR CONSPIRACY. THE CORRESPONDENCE BRIEFLY DISCUSS COMMERCIAL BUSINESS AND I EXPRESS NO COMMITMENT TO HIS OVERTURES. AFTER A FOUR MONTH PERIOD OF NO CORRESPONDENCES IN ~~2009~~ AUGUST 2009 HE OFFERS TO PAY FOR TRAVEL. I DON'T EVEN REPLY TO HIS OFFER. AFTER NO CORRESPONDENCE FOR A YEAR I EMAIL HIM IN SEPTEMBER 2010 THAT I AM IN RUSSIA. I CONTACTED HIM BECAUSE HE WAS THE ONLY PERSON OUT OF MANY THAT I MET IN 2008 WHO EXPRESSED INTEREST IN MY ENDEAVORS. AROUND THAT TIME I ALSO REACHED OUT TO TWO AMERICANS WHO WERE DOING BUSINESS IN RUSSIA TO EXPLORE POSSIBLE COLLABORATION. THERE ARE SEVERAL OTHER POINTS TO CONSIDER:

A) VAGUENESS OF EMAIL ADDRESS, NOT ATTRIBUTED TO AN ESTABLISHED BUSINESS, INDICATES THAT HE LIKE MOST RUSSIANS WITH SIDE BUSINESS WAS TRYING TO AVOID SCRUTINY BY THE RUSSIAN GOVERNMENT OR HIS REGULAR EMPLOYER.

B) SBRATOV IN EMAIL ADDRESS MAY INDICATE HE HAS TIES TO THAT CITY OR REGION AND NOT SAMARA.

C) DISCUSSIONS OF COMMERCIAL BUSINESS DID NOT PROGRESS

D) OFFER TO PAY FOR TRAVEL IS CUSTOMARY IN BUSINESS. I IGNORED THE OFFER NOR REPLY TO HIS EMAIL AND DID NOT CORRESPOND WITH HIM FOR OVER A YEAR AFTER THE OFFER SHOWING A LACK OF CONSPIRACY IN THE RELATIONSHIP. IF HE WERE A HANDLER THERE WOULD HAVE BEEN AN ESTABLISHED MEANS OF COMPENSATION <sup>AND</sup>. HE WOULD NOT HAVE BROADCASTED AN OFFER IN AN EMAIL.



## GROUND SIX CONTINUATION SHEET

10) EMAILS WITH A VIKY A MALEEV

- SINCE A BONA FIDE BUSINESS PROJECT, WE DISCUSSED REACHING OUT TO THE US GOVERNMENT FOR FUNDING AND I EXPRESSED THE POSSIBILITY OF MOVING TO WASHINGTON DC TO PURSUE US GOVERNMENT FUNDING. I LOST WHAT LITTLE INTEREST I HAD IN THE PROJECT AND MOVED TO VIRGINIA BEACH, VA. MY EMPLOYER ASSIGNED ME TO A PROJECT IN NORTHERN VIRGINIA AND I EMAILED MALEEV THAT I MOVED TO WASHINGTON, DC TO FEIGN INTEREST IN THE RELATIONSHIP. SUBSEQUENTLY ENDED ALL CONTACT.

11) EMAILED PRESENTATION OF SAID LOGISTICS PROJECT TO PEOPLE I KNEW WHO WERE AFFILIATED WITH THE US GOVERNMENT

- SINCE I KNEW NOTHING ABOUT OBTAINING US GOVERNMENT FUNDING I REACHED OUT TO THOSE WHO COULD POSSIBLY ASSIST. I BELIEVE NONE REPLIED NOR DID I FOLLOW UP.

12) HAD TRANSIT STAMP INTO UKRAINE IN 1996 IN PASSPORT

- I DID NOT HAVE A VISA TO TRAVEL IN UKRAINE AND I WAS GOING TO RUSSIA. THE BORDER CONTROL GAVE ME A TRANSIT ENTRY STAMP TO ALLOW PASSAGE.

13) RELIEVED OF COMMAND AND MIAID CLEARANCE SUSPENDED IN 2005.

- IN HINDSIGHT THIS WAS A RESULT OF MY FIRST BIPOLAR EPISODE. IF I WERE IN A CONSPIRACY I WOULD HAVE BEEN MORE CAREFUL WITH MY MILITARY CAREER. DESPITE MY RELIEF FOR CAUSE I WAS OFFERED THE OPTION TO STAY IN THE US ARMY. IF I WERE IN A CONSPIRACY I SHOULD HAVE STAYED IN OR GONE INTO THE RESERVES OR PURSUED GOVERNMENT EMPLOYMENT. INSTEAD FOR FIVE YEARS I LIVED A QUIET LIFE WORKING IN COMMERCIAL BUSINESS AVOIDING GOVERNMENT AFFILIATION.

GROUND SIX CONTINUATION SHEET

14) COMPLETED SF 88 FOR CLEARANCE IN 2008

I WAS IN THE INACTIVE READY RESERVES AND ORDERED TO DISC. EVEN THOUGH I ENTERED MY MILITARY CAREER I STILL FOLLOWED ORDERS.

15) EMAILED RESERVE RECRUITER IN 2008

I OPTED NOT TO PURSUE THE RESERVES. IF I WERE IN A CONSPIRACY I WOULD HAVE PURSUED JOINING THE RESERVES.

16) JANUARY 2010 LETTER FROM CLEARANCE ADJUDICATOR

- I FOLLOWED IT AS DIRECTED WHILE I WAS UNDER CLEARANCE JURISDICTION UNTIL MARCH 2010. MY CONTACT WITH IVAN AND MALEEV WAS WHILE I WAS NOT UNDER CLEARANCE JURISDICTION. I ENDED CONTACT IN JANUARY 2011.

WHEN I CAME UNDER CLEARANCE JURISDICTION IN APRIL 2011 I REPORTED MALEEV BECAUSE WE HAD EXTENSIVE CORRESPONDENCE. I DID NOT REPORT IVAN BECAUSE HE DID NOT MEET THE THRESHOLD OF "CLOSE OR CONTINUOUS" CONTACT. THE FACT THAT I WENT TO RUSSIA AND HAD INTEREST IN A RUSSIAN BUSINESS PROJECT SHOW A LACK OF CONSPIRACY. IF I WERE IN A CONSPIRACY I WOULD HAVE GIVEN BETTER REGARDS TO MY CLEARANCE OR NOT REPORT MALEEV AND DELETED THE EMAILS.

17) MOVED TO THE DC AREA AT THE END OF 2010.

- I ORIGINALLY MOVED FROM MINNESOTA TO SETTLE IN THE VIRGINIA BEACH AREA BUT MY EMPLOYER ASSIGNED ME TO A PROJECT IN NORTHERN VIRGINIA.

18) I HAD ARMY FIELD MANUALS

- THEY WERE UNCLASSIFIED AND I WAS AUTHORIZED TO KEEP THEM IN MY PERSONAL POSSESSION.

## GROUND SIX CONTINUATION SHEET

19) I APPLIED TO THE CIA AT THE END OF 2010

- I APPLIED TO NUMEROUS JOBS BOTH COMMERCIAL AND GOVERNMENTAL AT THAT TIME. I FELT I OVERCAME SOME PSYCHOLOGICAL ISSUES AND FELT CONFIDENT TO APPLY FOR WORK OF GREAT RESPONSIBILITY

20) I WENT INTO SPECIAL FORCES

- I WAS DRAWN BY THEIR MOTTO "FREEDOM TO THE OPPRESSED" AFTER WITNESSING INJUSTICE IN RUSSIA

21) MY MOTHER WAS FROM THE FORMER SOVIET UNION

- DECLARED IT ON MY SF 86. SHE FERMEN MY ANTI-PATHY TOWARDS THE SOVIET SYSTEM WHICH IS STILL IN POWER IN RUSSIA  
- HER ETHNICITY WAS HALF POLISH AND HALF UKRAINIAN

22) WIFE IS A DUAL NATIONAL

- DECLARED IT ON MY SF 86 AND IT HAS BEEN A HINDERANCE TO MY CAREER. IF I WERE IN A CONSPIRACY I WOULD HAVE MADE SURE SHE WAS A SOLLE US NATIONAL.

23) CHILDREN ARE DUAL NATIONALS

- I SUBMITTED MY MOST RECENT SF 86 BEFORE I LEARNED OF THEIR DUAL CITIZENSHIP. IF I WERE IN A CONSPIRACY I WOULD HAVE MADE SURE THEY WERE SOLLE US NATIONALS.

24) I WAS GIVEN INFORMATION ON A LOGISTICS PROJECT

- I DO NOT KNOW HOW EVAN KNEW MAGEEV BUT HE WAS LOOKING FOR SOURCES OF FUNDING AND THOUGHT I COULD ASSIST BASED OFF MY US RESIDENCE, PREVIOUS WORK, AND LOGISTICS EXPERTISE.

GROUND SIX CONTINUATION SHEET

25) PHOTOS IN RUSSIAN UNIFORM

- ~~HAPPENED~~/TAKEN IN 1994 WHEN I WAS 19 YEARS OLD. ANOTHER AMERICAN IS IN ONE OF THE PHOTOS, WE WERE PLAYING DRESS UP WHILE WE WERE GUEST.

-NO EVIDENCE OF CORPUS DELICTI

26) RUSSIAN MILITARY PATCHES IN MY POSSESSION

-ACQUIRED FROM BROTHER-IN-LAW OF RUSSIANS I MET EPHEMERALLY.

-NO EVIDENCE OF CORPUS DELICTI

27) NO REPORTED CONTACT WITH RISS

- ABSENCE OF ONE THING DOES NOT MEAN THE PRESENCE OF ANOTHER

-RUSSIA IS A HOSTILE ENVIRONMENT BUT MOST FOREIGN TRAVELLERS HAVE NO CONTACT WITH RISS. I REPORTED SUSPICIOUS ACTIVITIES <sup>IN 2003, 2005, AND 2012</sup> I ALSO

PASSED MY 2013 WORKPLACE POLYGRAPH WHICH SHOWS THE PROGRESSIVE NATURE OF MY BIPOLAR DISORDER. I WAS LIKELY AN UNSUITABLE CANDIDATE FOR DIRECT APPROACH FOR DEVELOPMENT DUE TO MY POLITICAL VIEWS CRITICAL OF THE RUSSIAN GOVERNMENT. I WAS OPEN AND ACTIVE IN AGITATING RUSSIANS TO CHANGE THEIR CORRUPT GOVERNMENT DURING MY TRAVELS. MY WIFE REPEATEDLY WARNED ME THAT PEOPLE LIKE ME END UP DEAD IN RUSSIA. RISS WOULD HAVE EASILY KNOWN OF MY VIEWS AND UNSUITABILITY BECAUSE THEY LIKELY QUESTIONED MY ASSOCIATES. IN 2003 NEARLY ALL OF MY ASSOCIATES EXCEPT FOR RELATIVES ENDED THEIR RELATIONSHIP WITH ME LIKELY DUE TO FEAR IN THE CHANGED POLITICAL CLIMATE.

FINAL POINT) IF ONE COMPARES MY CLAIMS WITH INTELLIGENCE TRAFECRAFT ONE WOULD CONCLUDE THAT MY INCULPATORY CLAIMS LACK CREDIBILITY AND ARE UNTRUSTWORTHY. I DID NOT INCLUDE THESE POINTS ~~IN~~ IN ORDER TO SAFEGUARD SENSITIVE INFORMATION.



GROUND SIX CONTINUATION SHEET

(b) DIRECT APPEAL OF GROUND SIX

(1) IF YOU APPEALED FROM THE JUDGMENT OF CONVICTION, DID YOU RAISE THIS ISSUE?

YES  NO

(2) IF YOU DID NOT RAISE THIS ISSUE IN YOUR DIRECT APPEAL, EXPLAIN WHY?

I HAD UNTREATED MENTAL ILLNESS AND INSUFFICIENT KNOWLEDGE OF THE LAW.

(c) POST-CONVICTION PROCEEDINGS

(1) DID YOU RAISE THIS ISSUE IN ANY POST-CONVICTION MOTION, PETITION, OR APPLICATION?

YES  NO

GROUND SEVEN CONTINUATION SHEET

INEFFECTIVE ASSISTANCE OF COUNSEL

(a) COUNSEL FAILED TO PROVIDE TO ME MR REVIEW WITH ME DISCOVERY WHICH WOULD HAVE ENSURED THAT I COULD CONSIDER A DEFENSE AND KNOWINGLY ENTER A PLEA.

(b) DIRECT APPEAL OF GROUND ~~SIX~~ SEVEN:

(1) IF YOU APPEALED THE JUDGMENT OF CONVICTION, DID YOU RAISE THIS ISSUE?

YES  NO

(2) IF YOU DID NOT RAISE THIS ISSUE IN YOUR DIRECT APPEAL, EXPLAIN WHY I WAS SUFFERING UNTREATED MENTAL ILLNESS AND HAD INSUFFICIENT KNOWLEDGE OF THE LAW.

(c) POST-CONVICTION PROCEEDINGS:

(1) DID YOU RAISE THIS ISSUE IN ANY POST-CONVICTION MOTION, PETITION, OR APPLICATION?

YES  NO

GROUND EIGHT CONTINUATION SHEET

INEFFECTIVE ASSISTANCE OF COUNSEL

(a) COUNSEL DID NOT PROVIDE ME THE SENTENCING PACKET IN A TIMELY MANNER TO ALLOW ME TO REVIEW ~~IT~~<sup>IT</sup> AND CORRECT ANY ERRORS. IT WAS GIVEN TO ME ON MAY 11, 2021 AFTER JUDGE HILTON RECEIVED IT. THE PACKET CONTAINED ERRORS SUCH AS STATING THAT I TRAVELLED TO RUSSIA IN 2017. IT SHOULD HAVE BEEN WRITTEN ENGLAND. THE LAST TIME I WAS IN RUSSIA WAS IN 2010. SUCH INCORRECT INFORMATION WOULD MAKE A READER BELIEVE THAT I WAS ENGAGED IN A CONSPIRACY DURING THAT TIME AFFECTING THE SENTENCING DECISION.

(b) DIRECT APPEAL OF GROUND EIGHT

(1) IF YOU APPEALED FROM THE JUDGEMENT OF CONVICTION, DID YOU RAISE THIS ISSUE?

YES  NO

(2) IF YOU DID NOT RAISE THIS ISSUE IN YOUR DIRECT APPEAL, EXPLAIN WHY:

I WAS SUFFERING UNTREATED MENTAL ILLNESS AND HAD INSUFFICIENT KNOWLEDGE OF THE LAW.