

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

| | | |
|--------------------------|---|----------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | |
| |) | Case No. 1:24-mj-154 |
| AMIR SABET, |) | |
| |) | |
| |) | |
| Defendant. |) | |

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Officer Connor Markee, being duly sworn, state the following:

1. I entered on duty with the Security Protective Service (“SPS”) of the Central Intelligence Agency (“CIA”) in January 2023. Upon joining SPS, I completed Uniformed Police Training Program and the Federal Law Enforcement Training Center. I am a federal law enforcement officer as provided in 50 U.S.C. § 3515(a)(1).

2. This affidavit is submitted in support of a criminal complaint charging AMIR SABET with criminal trespass at the George Bush Center for Intelligence in McLean, Virginia (“CIA Headquarters”), in violation of 32 C.F.R. § 1903.7(a), which prohibits entering or remaining on an Agency installation without proper authorization, as well as failing to obey an order to leave a CIA installation after being instructed to do so by an authorized person.

3. The facts and information contained in this affidavit are based upon my personal knowledge and observations during the course of this investigation, information conveyed to me by other individuals, including law enforcement officers, and my review of records, documents, and other physical evidence obtained during the investigation. This affidavit contains information

necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

4. On Friday, April 12, 2024, at approximately 3:51 p.m., I was positioned near the main gate checkpoint at the George Bush Center for Intelligence (also known as the CIA's Headquarters), located in McLean, Virginia, within the Eastern District of Virginia. I received a call over my radio that an individual had exited a Fairfax Connector bus and entered the Visitor Control Center. The Visitor Control Center is located within the CIA's property line and is accessible only after passing two warning signs, which read in pertinent part:

“WARNING
RESTRICTED
U.S. GOVERNMENT
INSTALLATION
EMPLOYEES AND OFFICIAL VISITORS ONLY
IT IS UNLAWFUL TO ENTER
OR ATTEMPT TO ENTER
THIS INSTALLATION WITHOUT
PROPER AUTHORIZATION.
32 C.F.R. 1903”


I was informed over my radio that this individual was attempting to enter the CIA but appeared to be unauthorized to do so.

5. After walking into the Visitor Control Center, I encountered other CIA police officers speaking to an individual, and I was informed by those officers that they believed the individual was the same individual who had been issued a criminal citation for trespassing at the

George Bush Center for Intelligence a few weeks prior. I spoke to the individual and asked him for his name, date of birth, and why he had come to the CIA. The individual identified himself as AMIR SABET and provided his date of birth. SABET told me that he had lost his passport and wallet. Another officer contacted dispatch to run the name and date of birth through a CIA database of known personnel and prior unauthorized visitors. Dispatch responded that that name and date of birth matched AMIR SABET, who had been previously issued a criminal citation on or about March 25, 2024, for trespassing at the George Bush Center for Intelligence. Dispatch also advised that SABET had been previously arrested in 2015 for trespassing at the George Bush Center for Intelligence.

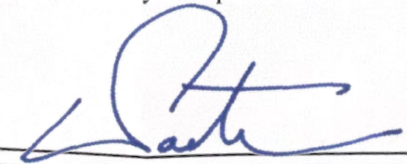
6. SABET further told me that he is homeless and lives near a McLean bus stop, and SABET stated that an individual had approached him at the bus stop and told him to go to CIA to obtain a badge and to start work. Another officer responded that SABET had been previously told that unknown individuals do not approach people and legitimately tell people to come to the CIA, and that officers had previously told SABET to not return to the CIA. I understood this statement to mean that SABET had previously told officers a similar story when he was cited for trespassing on or about March 25, 2024. SABET replied that he believed the individual. I then placed SABET under arrest.

7. Based on the foregoing, I submit there is probable cause to believe that on April 12, 2024, within the Eastern District of Virginia, AMIR SABET did enter on an Agency installation without proper authorization, or reentered on an Agency installation after being instructed not to reenter by an authorized person, in violation of 32 C.F.R. § 1903.7(a).



Officer Connor Markee
Security Protective Service
Central Intelligence Agency

Subscribed and sworn to before me
This 14th day of April 2024.



Honorable William B. Porter
United States Magistrate Judge
Alexandria, Virginia