

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on December 6, 2019

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	
	:	
MARIAM TAHA THOMPSON,	:	Violations:
	:	
Defendant.	:	18 U.S.C. § 794(c)
	:	(Conspiracy to Deliver National
	:	Defense Information to Aid a Foreign
	:	Government)
	:	
	:	18 U.S.C. § 794(a)
	:	(Delivering National Defense Information
	:	to Aid a Foreign Government)
	:	
	:	18 U.S.C. § 793(e)
	:	(Willful Retention of National
	:	Defense Information)
	:	
	:	

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Between on or about December 30, 2019, and on or about February 27, 2020, in locations outside of the jurisdiction of any particular state or district, including Erbil, Iraq, within the extraterritorial jurisdiction of the United States and therefore within the venue of the United States District Court for the District of Columbia, pursuant to Title 18, United States Code, Section 3239, Defendant, **MARIAM TAHA THOMPSON**, did knowingly and unlawfully conspire with an Unindicted Co-Conspirator (UCC) and others, known and unknown to the grand jury, to communicate, deliver, and transmit to a faction, party, and military force within a

foreign country, whether recognized or unrecognized by the United States, and to representatives, officers, agents, employees, subjects, and citizens of Lebanon, directly and indirectly, classified documents, writings, notes, and classified information relating to the national defense, with intent and reason to believe that such documents and information were to be used to the injury of the United States and to the advantage of a foreign nation.

In furtherance of the said conspiracy and to effect the objects thereof, Defendant, **MARIAM TAHA THOMPSON**, and other conspirators committed the following overt acts, among others:

1. Between on or about December 30, 2019, and on or about February 27, 2020, THOMPSON transmitted three different items containing national defense information classified at the SECRET level to the UCC.
2. Between on or about December 30, 2019, and on or about February 27, 2020, THOMPSON concealed beneath the mattress in her living quarters in Erbil, Iraq, a handwritten Arabic note containing classified national defense information.

(Conspiracy to Deliver National Defense Information to Aid a Foreign Government, in violation of 18 U.S.C. § 794(c))

COUNT TWO

Between on or about December 30, 2019, and on or about February 27, 2020, in locations outside of the jurisdiction of any particular state or district, including Erbil, Iraq, within the extraterritorial jurisdiction of the United States and therefore within the venue of the United States District Court for the District of Columbia, pursuant to Title 18, United States Code, Section 3239, Defendant, **MARIAM TAHA THOMPSON**, did knowingly and unlawfully communicate, deliver, and transmit to a faction, party, and military force within a foreign country, whether recognized or unrecognized by the United States, and to representatives,

officers, agents, employees, subjects and citizens of Lebanon, directly and indirectly, classified documents, writings, notes, and classified information relating to the national defense, with intent and reason to believe that such documents, writings, notes, and information relating to the national defense were to be used to the injury of the United States and to the advantage of a foreign nation.

(Delivering National Defense Information to Aid a Foreign Government, in violation of 18 U.S.C. § 794(a))

COUNT THREE

Beginning on or about December 30, 2019, and continuing until on or about February 27, 2020, in locations outside of the jurisdiction of any particular state or district, including Erbil, Iraq, within the extraterritorial jurisdiction of the United States and therefore within the venue of the United States District Court for the District of Columbia, pursuant to Title 18, United States Code, Section 3239, Defendant, **MARIAM TAHA THOMPSON**, having unauthorized possession of, access to, and control over a document containing information relating to the national defense, willfully retained the document and failed to deliver it to the officer or employee of the United States entitled to receive it.

(Willful Retention of National Defense Information, in violation of 18 U.S.C. § 793(e))

A TRUE BILL

FOREPERSON


Attorney of the United States in
and for the District of Columbia