

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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UNITED STATES OF AMERICA

v.

NISAR AHMED CHAUDHRY,

Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Criminal No. DKC-18-0226

Failure to File a Foreign Agent
Registration Statement,
22 U.S.C. §§ 611(c)(1), 612, 618(a)

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INFORMATION

The United States Attorney for the District of Maryland charges that:

COUNT ONE

At all times material to this Information:

1. Defendant NISAR AHMED CHAUDHRY, a national of Pakistan and a lawful permanent resident of the United States, resided in Maryland. CHAUDHRY represented himself to be the President of the Pakistan American League, which was an unincorporated entity he created and associated with his residential address.

2. The Government of Pakistan maintained an Embassy in Washington, D.C., to which it posted diplomatic officers and employees officially identified to, and recognized by, the United States Department of State, such as Pakistan's Ambassador to the United States, intelligence officers associated with Pakistan's domestic Intelligence Bureau ("IB"), and various military attachés associated with Pakistan's Ministry of Defence, which included its foreign intelligence agency, the Inter-Services Intelligence Directorate ("ISI"). The Government of Pakistan also maintained a consular office in New York City to which it posted additional diplomatic officers and employees, including IB and ISI officers.

3. Numerous institutes, foundations, and organizations operating in and around Washington, D.C., commonly referred to as “think tanks,” played a role in shaping and influencing United States foreign policy, and employed scholars and other individuals with specialized knowledge in South Asia affairs, including former United States government employees who had been engaged in South Asia matters during their tenure as government officials with the Departments of State and Defense and other United States government institutions.

4. Individuals operating within the United States on behalf of a foreign government were required, under the Foreign Agents Registration Act and corresponding regulations established by the Attorney General, to provide notification of their activities through the filing of a registration statement with the Attorney General.

The Charge

5. Beginning in or about 2012, and continuing up to and through the date of this Information, in the District of Maryland, the District of Columbia, and elsewhere,

NISAR AHMED CHAUDHRY,

defendant herein, knowingly and willfully failed to register with the Attorney General as required by law while he acted as an agent of foreign principals, namely the Government of Pakistan, including its military, intelligence, and diplomatic officials, in violation of Title 22, United States Code, Sections 612 and 618(a).

6. During the time frame charged in this Information, CHAUDHRY engaged in the following conduct on behalf, and at the behest, of the Government of Pakistan in order to obtain and manage information on matters of interest to the Government of Pakistan, namely, the status of the United States Government’s policies regarding Pakistan, and its views of, and intentions towards, Pakistan.

a. CHAUDHRY cultivated influential contacts within the Washington, D.C., political and think tank communities and the United States government in order to obtain in-depth information regarding the United States government's policies towards Pakistan.

b. CHAUDHRY organized roundtable discussions in the Washington, D.C., and Maryland metropolitan areas between his American government and think tank contacts and visiting Pakistan government officials and military officers to obtain information regarding American views of, and intentions towards, Pakistan that could be used, during the roundtable discussions and in the future, to influence United States foreign policy in a direction favorable to Pakistan's interests.

c. CHAUDHRY sought to neutralize unfavorable views of Pakistan held by current and former United States government officials and American South Asia scholars by employing certain methods of discussion with these individuals during personal interactions with them and/or by controlling and manipulating discussion at roundtable events he organized and/or attended.

d. In order to be more effective in obtaining information of interest to Pakistan, and gain a strategic advantage in acquiring information that might not otherwise be divulged to official representatives of the Government of Pakistan, CHAUDHRY falsely represented that his activities were not affiliated with the Pakistan government and its diplomatic officials and military officers, and were simply educational in nature and executed solely to help improve United States-Pakistan relations.

e. CHAUDHRY refrained from filing an application to become a United States citizen in order to convince Pakistan government and diplomatic officials and military

officers of his allegiance to Pakistan and his credibility as an advocate of matters of interest to the Government of Pakistan.

f. CHAUDHRY traveled regularly to Pakistan to brief high-level Pakistan government officials and military officers on information gleaned from his American government and think tank contacts, and obtain briefings on matters of interest to Pakistan relevant to his activities in the United States on behalf of the Pakistan government.

g. CHAUDHRY organized press briefings in the Washington, D.C., and Maryland metropolitan areas for visiting Pakistan government or military dignitaries.

h. CHAUDHRY arranged for various South Asia scholars and/or former United States government officials to attend conferences in Pakistan organized by Pakistan government officials and military officers, including members of the National Defence University (hereafter "NDU"), Pakistan's highest-level professional military educational institution responsible for training the country's senior military leadership.

i. CHAUDHRY met with Pakistan government and diplomatic officials and military officers in the United States to discuss information gleaned from his American government and think tank contacts, report on the details of his meetings in Pakistan with high-level Pakistan government officials and military officers, and obtain information regarding matters of interest to Pakistan relevant to his activities in the United States on behalf of the Pakistan government.

j. In order to maintain the false appearance that he was not acting on behalf of the Government of Pakistan, CHAUDHRY willfully failed to file the required registration statement notifying the Attorney General of his activities on behalf of foreign principals, even

though he knew he was required to do so and that this failure to file such statement was a violation of United States law.

k. In consideration for his activities on behalf of the Government of Pakistan, CHAUDHRY was granted, among other things: invitations to events at, or sponsored by, the Pakistan Embassy; introductions to, and meetings with, high-level Pakistan government officials and military officers; assistance with procuring civilian, military, or government-related jobs and preferential postings for relatives and associates in Pakistan; assistance with securing Pakistani visas on an expedited basis for friends, relatives, or associates; reimbursement for certain travel expenses; and the use of diplomatic channels to ship personal items to and from Pakistan.

22 U.S.C. §§ 611(c)(1), 612, 618(a)

Robert K. Hur / by [signature]
Robert K. Hur
United States Attorney