

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

ALEX VAN DER ZWAAN,

Defendant.

Criminal No.:

Violation: 18 U.S.C. § 1001(a)(2) (False Statements)

Case: 1:18-cr-00031

Assigned To : Judge Jackson, Amy Berman

Assign. Date : 2/16/2018

Description: INFORMATION (A)

Case Related to: 17-cr-201 (ABJ)

**INFORMATION**

The Special Counsel informs the Court:

**(False Statements)**

On November 3, 2017, the defendant, ALEX VAN DER ZWAAN, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, the defendant falsely stated and represented to the Special Counsel's Office, including Special Agents of the Federal Bureau of Investigation, in Washington, D.C., in the course of answering questions concerning his work as an attorney employed by a law firm engaged in 2012 by the Ukraine Ministry of Justice to prepare a report on the trial of Yulia Tymoshenko:

- (i) his last communication with Richard W. Gates III was in mid-August 2016 (which consisted of an innocuous text message) and his last communication with Person A was in 2014 (when VAN DER ZWAAN and Person A discussed Person A's family); and
- (ii) he did not know why an email between him and Person A in September 2016 was not produced to the Special Counsel's Office,

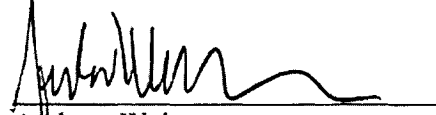
when in fact, as he then and there well knew and believed:

- (i) in or about September 2016, he spoke with both Gates and Person A regarding the Report, and surreptitiously recorded the calls; and
- (ii) he deleted and otherwise did not produce emails sought by the Special Counsel's Office and Law Firm A, including the email between Person A and him in September 2016.

**(Title 18, United States Code, Section 1001(a)(2))**

ROBERT S. MUELLER, III  
Special Counsel

By:



Andrew Weissmann  
Greg D. Andres  
Kyle Freeny  
Brian M. Richardson  
Senior/Assistant Special Counsel