



CITIZENS' GRAND JURY

**THE PEOPLE OF THE UNITED STATES OF
AMERICA,**

Plaintiff,

v.

ROBERT SWAN MUELLER III

Defendant.

CRIMINAL INDICTMENT

THE CITIZENS' GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

1. In March of 2015, Dr. Jerome Corsi ("Dr. Corsi") began investigating former U.S. Secretary of State Hillary Clinton's admission that while at the U.S. Department of State, she had conducted government business through an unsecure, non-government, private email server.

2. Then, on July 22, 2016, Wikileaks released a portion of the emails that it had obtained from the Democratic National Committee's ("DNC") server. Wikileaks announced publicly before the July 22, 2016 release that it would be releasing to the public DNC documents in several batches. Julian Assange ("Assange"), the founder and CEO of Wikileaks, announced after July 22, 2016 that he had more Democratic Party emails that he planned to make public in the future.

3. Dr. Corsi, upon reviewing documents leaked on July 22, 2016, noticed that emails to and from Hillary Clinton and her campaign manager John Podesta, which had been made publicly available by Wikileaks, were missing. Dr. Corsi then logically reasoned and thus

speculated that these emails would be released in a future batch, consistent with Assange's prior announcements.

4. On May 17, 2017, Defendant Robert Swan Mueller III (hereinafter referred to as "Defendant Mueller") was appointed Special Counsel by Deputy Attorney General Rod Rosenstein for a limited purpose investigation of the allegations of Russian interference in the 2016 presidential election. Defendant Mueller hired several attorneys to work under him and serve as prosecutors, including Jeannie S. Rhee, Andrew D. Goldstein, Aaron S.J. Zelinsky, and L. Rush Atkinson. Defendant Mueller, as their supervisor and employer, is held liable and responsible for the wrongful acts of his employees and agents, pursuant to the longstanding legal doctrine *respondeat superior*, as the coercion and intimidation occurred within the scope of his prosecutors' employment.

5. In the course of his investigation, Defendant Mueller misrepresented the investigative research conducted by Dr. Corsi and spun the fake narrative that Dr. Corsi "colluded" with Russian intelligence. This was based on Dr. Corsi's logical and investigative deduction in July that the emails belonging to John Podesta constituted the bulk of the remaining Democratic Party emails that Assange planned to make public after the initial release of July 22, 2016.

6. Based on these misrepresentations by Defendant Mueller, he threatened to indict Dr. Corsi and put him in federal prison unless Dr. Corsi provided the false sworn testimony under oath that Defendant Mueller demanded.

7. For example, Defendant Mueller demanded that Dr. Corsi falsely testify under oath that he acted as a liaison between Roger Stone and Wikileaks leader Assange concerning the public release of emails obtained from the DNC's servers.

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8. Defendant Mueller and his prosecutorial staff sought to coerce knowingly-false testimony from Dr. Corsi to falsely “prove” that he had acted as a liaison between Roger Stone Assange on the one hand and the Trump presidential campaign on the other concerning the public release of emails from the email computer servers.

9. Dr. Corsi explicitly made clear that he had been unable to review his old emails and thus could not give accurate testimony until he could reload emails on his old laptop. Defendant Mueller and his prosecutorial staff agreed that Dr. Corsi would have a chance to amend his answers as necessary, as memories fade. When Dr. Corsi received his laptop back from the FBI, he reloaded the 2016 data, and then found an email dated July 25, 2016 in which Roger Stone asked him to “get to Assange.” He then correctly and honestly amended his answers, as he said he would do.

10. Defendant Mueller, by and through his prosecutorial staff, press secretary and others in the office of Special Counsel, knowingly and deceitfully threatened to charge Dr. Corsi with an alleged false statement during his first interview with the FBI on September 6, 2018, that he had told them he could not answer with certainty, and which he had amended. Defendant Mueller deceitfully sought to prosecute statements that were amended.

11. Additionally, Defendant Mueller criminally violated Federal Rule of Criminal Procedure 6(e)(2) which governs the secrecy requirement of grand jury proceedings. Rule 6(e)(2) prohibits “an attorney for the government” from disclosing matters occurring before a grand jury. Rule 1(b) defines “attorney for the government” to include as the Attorney General, an authorized assistant of the Attorney General, a U.S. Attorney, an authorized assistant of a U.S. Attorney, and certain other persons in cases arising under the laws of Guam. Certainly, Defendant Mueller is an attorney for the government.

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12. For example, an article published by ABC News titled "Conspiracy Theorist Becomes Key Figure as Mueller Builds Case" contains confidential information regarding the grand jury proceeding about Dr. Corsi that could only possibly come from Defendant Mueller.

13. Additionally, it was revealed that Defendant Mueller made a major leak concerning President Donald J. Trump to Buzzfeed, namely that the president had ordered his private legal counsel Michael Cohen to lie to congressional committees over the Trump organization's business dealings with Russia.

14. After calls for a U.S. Department of Justice investigation of this leak, Defendant Mueller falsely repudiated what Buzzfeed had reported were indeed leaks from the Special Counsel.

15. In yet another grand jury leak, this one concerning Dr. Corsi, Defendant Mueller unlawfully disclosed to The Washington Post, in violation of grand jury secrecy rules and through the use of illegal surveillance, confidential information about Dr. Corsi's remunerative employment relationship with InfoWars resulting in him losing his employment. This leak was used by The Washington Post to publish defamatory articles that Dr. Corsi's payments from InfoWars were "hush money."

16. This confidential, grand jury and illegally obtained information concerning his investigation was at the time only known by Defendant Mueller and those working at his direction, such as Peter Carr, Defendant Mueller's press secretary. Through the work of Freedom Watch, Inc. and its successful Freedom of Information Act ("FOIA") request, it has been revealed that Peter Carr, at the direction of Defendant Mueller, met secretly with media at Paul Restaurant at 801 Pennsylvania Avenue, N.W., Washington, D.C. Here, among other places, is

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where Defendant Mueller, through Peter Carr, leaked grand jury information without leaving a paper trail.

17. This illegal misconduct was carried out and conducted in conjunction with Defendant Mueller's grand jury investigation. This way, Defendant Mueller tried to illegally obtain information concerning Dr. Corsi that can be used to coerce, extort, threaten and blackmail Dr. Corsi into testifying falsely to implicate the president of the United States in crimes and have him removed from office.

COUNT ONE
(Violation of Fed. R. Crim. P. 6(e)(2))
Violation of Grand Jury Secrecy Provisions

18. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

19. Federal Rule of Criminal Procedure 6(e)(2) provides that federal government grand jury proceedings have secrecy requirements, mandating that "(B) unless these rules provide otherwise, the following persons must not disclose a matter occurring before the grand jury: (i) a grand juror; (ii) an interpreter; (iii) a court reporter; (iv) an operator of a recording device; (v) a person who transcribes recorded testimony; (vi) an attorney for the government; or (vii) a person to whom disclosure is made under Rule 6(e)(3)(A)(ii) or (iii).

20. Defendant Mueller, by and through his staff, and as an attorney for the government and specifically the U.S. Department of Justice, violated Federal Rule of Criminal Procedure 6(e)(2) by leaking grand jury information concerning Dr. Corsi to the media.

21. These leaks were meant to pressure Dr. Corsi into providing false testimony that Defendant Mueller and his staff sought by portraying Dr. Corsi negatively through the media, as



well as to destroy him if he does not comply with the demand that he provide false testimony under oath concerning President Trump or be indicted himself.

22. These leaks are also intended to send a message to other supporters of President Trump that they had best comply with the unlawful demands of Defendant Mueller and his prosecutorial staff or be indicted or at least be irreparably smeared and destroyed in the public domain.

23. A knowing violation of Federal Rule of Criminal Procedure 6, or of any guidelines jointly issued by the Attorney General and the Director of National Intelligence under Rule 6, may be punished as a contempt of court. Fed. R. Crim. P. 6(e)(7).

24. These acts constitute a violation of Fed. R. Crim. P. 6.

COUNT TWO
(Violation of 18 U.S.C. § 401(2))
Unauthorized Disclosure of Grand Jury Information

25. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

26. Defendant Mueller can be prosecuted for criminal contempt under 18 U.S.C. § 401(2) for making an unauthorized disclosure of grand jury information.

27. 18 U.S.C. § 401(2) provides, “[a] court of the United States shall have power to punish by fine or imprisonment, or both, at its discretion, such contempt of its authority, and none other as . . . (2) [m]isbehavior of any of its officers in their official transactions.” 18 U.S.C. § 401(2).

28. Defendant Mueller misbehaved when he disclosed grand jury information to the media and others.

29. These acts constitute a violation of 18 U.S.C. § 401(3).

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COUNT THREE

(Violation of 18 U.S.C. § 641)

Improper Dissemination of Grand Jury Materials, Theft of Government Property

30. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

31. Defendant Mueller can be prosecuted under 18 U.S.C. § 641 for improperly disseminating grand jury materials that were the property of the government.

32. 18 U.S.C. § 641 provides:

[w]hoever embezzles, steals, purloins, or knowingly converts to his use or the use of another, or without authority, sells, conveys, or disposes of any record, voucher, money, or thing of value of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof; or [w]hoever receives, conceals, or retains the same with intent to convert it to his use or gain, knowing it to have been embezzled, stolen, purloined or converted – [s]hall be fined under this title or imprisoned not more than ten years, or both; but if the value of such property in the aggregate, combining amounts from all the counts for which the defendant is convicted in a single case, does not exceed the sum of \$1,000, he shall be fined under this title or imprisoned not more than one year, or both. The word “value” means face, par, or market value, or cost price, either wholesale or retail, whichever is greater.

33. When Defendant Mueller leaked grand jury information to the media, he disseminated information that was property of the government.

34. These acts constitute a violation of 18 U.S.C. § 641.

COUNT FOUR

(Violation of 18 U.S.C. § 1512)

Tampering with a Witness

35. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

36. Defendant Mueller can be prosecuted pursuant to 18 U.S.C. § 1512 for tampering with a witness, Dr. Corsi.

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37. 18 U.S.C. § 1512 provides, in pertinent part:

(b) Whoever knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to—

(1) influence, delay, or prevent the testimony of any person in an official proceeding;^[1]

(2) cause or induce any person to—

(A) withhold testimony, or withhold a record, document, or other object, from an official proceeding;^[1]

(B) alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;

(C) evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding; or^[1]

(D) be absent from an official proceeding to which such person has been summoned by legal process; or

(3) hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation [1] supervised release,,[1] parole, or release pending judicial proceedings;

shall be fined under this title or imprisoned not more than 20 years, or both.

(k) Whoever conspires to commit any offense under this section shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.

38. Dr. Corsi clearly and specifically informed Defendant Mueller and his prosecutorial staff that the assertions they wanted him to testify to would be false and that he could not testify as they wished without committing perjury.

39. Defendant Mueller and his prosecutorial staff counseled and attempted to coerce Dr. Corsi to commit a felony, all in their zeal to persuade Dr. Corsi to lie to obtain indictments for other subjects and targets, including President Trump.

40. These acts constitute a violation of 18 U.S.C. § 1512.

COUNT FIVE
(Violation of 18 U.S.C. § 1513)
Retaliating Against a Witness

41. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

42. Defendant Mueller can be prosecuted pursuant to 18 U.S.C. § 1513 for retaliating against witness Dr. Corsi.

43. 18 U.S.C. § 1513 provides, in pertinent part:

(e) Whoever knowingly, with the intent to retaliate, takes any action harmful to any person, including interference with the lawful employment or livelihood of any person, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any Federal offense, shall be fined under this title or imprisoned not more than 10 years, or both.

(f) Whoever conspires to commit any offense under this section shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.

(g) A prosecution under this section may be brought in the district in which the official proceeding (whether pending, about to be instituted, or completed) was intended to be affected, or in which the conduct constituting the alleged offense occurred.

44. Dr. Corsi testified truthfully and gave accurate statements of the events related to Defendant Mueller's investigation to the best of his personal knowledge and belief.

45. Because Dr. Corsi refused to testify falsely, Defendant Mueller threatened to indict him because he did not provide the false information Defendant Mueller wanted.

46. As such, Defendant Mueller formed a retaliatory motive and threatened Dr. Corsi with indictment.

47. These acts constitute a violation of 18 U.S.C. § 1513.

COUNT SIX
(Violation of 18 U.S.C. § 1505)
Obstruction of Proceedings Before Departments, Agencies, and Committees

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48. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

49. Defendant Mueller can be prosecuted pursuant to 18 U.S.C. § 1505 for obstructing proceedings.

50. 18 U.S.C. § 1505 provides, in pertinent part: "Whoever corruptly, or by threats or force, or by any threatening letter or communication influences, obstructs, or impedes or endeavors to influence, obstruct, or impede the due and proper administration of the law under which any pending proceeding is being had before any department or agency of the United States, or the due and proper exercise of the power of inquiry under which any inquiry or investigation is being had by either House, or any committee of either House or any joint committee of the Congress –

Shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both.

51. When Defendant Mueller tried to coerce and threaten Dr. Corsi to provide false testimony, he tried to corruptly influence the process of his investigation.

52. These acts constitute a violation of 18 U.S.C. § 1505.

COUNT SEVEN
(Violation of 18 U.S.C. § 1622)
Conspiracy to Suborn Perjury

53. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

54. Defendant Mueller can be prosecuted pursuant to 18 U.S.C. § 1622 for conspiracy to suborn perjury.

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55. 18 U.S.C. § 1622 provides “[w]hoever procures another to commit any perjury is guilty of subornation of perjury, and shall be fined under this title or imprisoned not more than five years, or both.” 18 U.S.C. § 1622.

56. Defendant Mueller and his prosecutorial staff conspired to suborn perjury by seeking to threaten Dr. Corsi into testifying falsely with the grand jury commissioned by the Special Prosecutor’s Office sponsoring and using in court testimony by Dr. Corsi that they had been informed would be false testimony.

57. Conspiracy to suborn perjury may be prosecuted irrespective of whether perjury has been committed. *See* DOJ Criminal Resource Manual, 1752 Subornation of Perjury.

58. These acts constitute a violation of 18 U.S.C. § 1622.

COUNT EIGHT
(Violation of 18 U.S.C. § 1001)
Statements or Entries Generally

59. The previous allegations of the entirety of this Indictment are repeated and realleged with the same force and effect as if fully set forth herein again at length.

60. Defendant Mueller can be prosecuted pursuant to 18 U.S.C. § 1001 for attempting to use the false testimony elicited from Dr. Corsi.

61. 18 U.S.C. § 1001 provides:

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

(1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;^[1]_{SEP}

(2) makes any materially false, fictitious, or fraudulent statement or representation; or

(3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;

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shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

(b) Subsection (a) does not apply to a party to a judicial proceeding, or that party's counsel, for statements, representations, writings or documents submitted by such party or counsel to a judge or magistrate in that proceeding.^[1]~~[2]~~

(c) With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to—

(1) administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services, or a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch; or

(2) any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office of the Congress, consistent with applicable rules of the House or Senate.

62. Knowing the testimony Defendant Mueller and his prosecutorial staff wanted Dr. Corsi to give to be actually false – including having been repeatedly told by Dr. Corsi that the assertions are false – Defendant Mueller nevertheless coerced and threatened Dr. Corsi to provide false testimony he wanted to elicit from Dr. Corsi in court proceedings and indictments against other persons.

63. A violation of 18 U.S.C. § 1001 carries a maximum sentence of 5 years' imprisonment; a fine of \$250,000, pursuant to 18 U.S.C. § 3571(b)(3); a term of supervised release of not more than 3 years pursuant to 18 U.S.C. § 3583(b)(2); and an obligation to pay any applicable interest or penalties on fines and restitution not timely made.

64. Defendant Mueller and his prosecutorial staff (1) are using and would have used the false testimony by Dr. Corsi and other intimidated witnesses before the grand jury against other innocent victims of this prosecutorial misconduct; and (2) would have used the false

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testimony procured by misconduct in a report to the Acting Attorney General or other government officials in order to fraudulently induced Congress to use the false testimony to support articles of impeachment against President Trump and indictment of other persons.

65. These acts constitute a violation of 18 U.S.C. § 1001.

COUNT NINE
(Violation of 18 U.S.C. § 2381 and Common Law)
Treason

66. The previous allegations of the entirety of this Indictment are repeated and re-alleged with the same force and effect as if fully set forth herein again at length.

67. Defendant Mueller can be prosecuted pursuant to 18 U.S.C. § 2381 for committing treason.

68. 18 U.S.C. § 2381 provides: “[w]hoever, owing allegiance to the United States, levies war against them or adheres to their enemies, giving them aid and comfort within the United States or elsewhere, is guilty of treason . . . shall be imprisoned not less than five years and fined under this title but not less than \$10,000; and shall be incapable of holding any office under the United States.” 18 U.S.C. § 2381.

69. Defendant Mueller, owing an allegiance to the United States as a government employee, committed treason when he subverted the U.S. Constitution, gave aid and comfort to those who wish to take down the current Trump administration – both foreign and domestic – and attempted to implement a coup d’état.

70. These acts constitute a violation of 18 U.S.C. § 2381 as well as the common law of We the People, which is based on moral law and the law of our Creator.

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A TRUE BILL

Nicholas Greer

FOREPERSON

LARRY KLAYMAN
Citizens' Grand Jury Prosecutor