

BEFORE THE CITIZEN'S GRAND JURY

THE PEOPLE OF THE UNITED
STATES OF AMERICA

Complainant,

v.

ROBERT HUNTER BIDEN
of Wilmington, Delaware

and

JOSEPH ROBINETTE BIDEN, Jr.
of Wilmington, Delaware

and

JAMES BIDEN
Merion Station, Pennsylvania

Accused.

CRIMINAL INDICTMENT

Case No. 2021-_____

CRIMINAL INDICTMENT

THE CITIZENS GRAND JURY CHARGES THAT:

I. GENERAL ALLEGATIONS

1. JOSEPH ROBINETTE BIDEN was elected to the U.S. Senate as a Senator from the State of Delaware in 1973, and re-elected continuously through the November 2008 election, when he was elected nationwide as Vice President in Barack Obama's Administration.

2. In a text message sent by ROBERT HUNTER BIDEN to his daughter, JOSEPH ROBINETTE BIDEN, Jr.'s granddaughter, ROBERT HUNTER BIDEN said (as part of a heated exchange):

“All during the time that I've been disrespected, I've been the

one who has supported this family for 30 years, and unlike pop I'm not going to require you to give half of your salary to me."

3. During the 2019-2020 election for U.S. President, unprecedented and vast sums of money materialized to attack the incumbent President Donald Trump on a scale never before seen and through mysterious, non-transparent channels.

4. The dark money and mysterious sources of funding to elect JOSEPH ROBINETTE BIDEN, Jr. as President, including as independent spending and Super-PACs amounted to hundreds of millions of dollars more than had ever been seen in a U.S. Presidential election before.

5. During the Administration of President Barack Obama and Vice President JOSEPH ROBINETTE BIDEN, Jr., in the slow, lengthy, troubled attempts to help the Ukraine emerge from communism and poverty after its inclusion in the Union of Soviet Socialist Republics to become a modern democracy, \$1.8 billion of international aid to the Ukraine went missing.

6. As PJ Media reported on March 21, 2018,

"The Biden family's dealings with this Ukrainian company involved getting one of the country's most notorious mob bankers, Ihor Kolomoisky, off the U.S. government visa ban list. Under Biden's leadership, \$3 billion in aid went to Ukraine, and his son's [Hunter's] company was implicated in the disappearance of \$1.8 billion of that money."

7. Burisma owner Zlochevsky together with Ihor Kolomoisky ran Privatbank (alternatively translated from Cyrillic as ProvatBank).

8. Billions of dollars of international foreign aid went through PrivatBank.

9. However, \$1.8 billion of the foreign aid disappeared from within Ukraine's banking system.

10. Ukrainian and international governmental authorities investigated the loss of the \$1.8 billion.

11. Ukraine raided Zlochevsky's home and seized his assets in early 2016, however by that time, Zlochevsky had fled beyond the reach of the Ukrainian government's authority, first to the small island country of Cyprus, and from there disappearing.

12. As Reuters reported on November 20, 2019,

"Ukraine has widened its investigation into the founder of energy company Burisma to include suspicion of embezzling state funds, Prosecutor General Ruslan Ryaboshapka said on Wednesday."

13. However, JOSEPH ROBINETTE BIDEN, Jr. falsely claimed in furtherance of the conspiracy that the investigation into Burisma Holdings, LLC, had been concluded.

14. However, it was the owner of Burisma Holdings, LLC, – not Burisma Holdings, LLC, itself – who was the primary focus of international criminal investigations.

15. The Bidens faced the prospect at the time that if Burisma's owner were prosecuted, payments to the Bidens through Burisma Holdings, LLC, would have been disrupted and the money flow stopped.

16. Payments from or through Burisma Holdings, LLC, to the Biden family totaled at least to at least \$3 million by then.

17. Burisma Holdings, LLC, is owned by Brociti Investments Ltd of Cyprus which is owned in turn by Mykola Zlochevsky.

18. Mykola Zlochevsky had been Ukraine's Minister of Ecology and Energy.

19. Ukraine is rich in natural resources and was the breadbasket of the former USSR, putting Mykola Zlochevsky as Minister in position to control vast wealth and direct favors to corrupt business partners in return for bribes and deals.

20. Mykola Zlochevsky obtained considerable wealth (in addition to whatever he had beforehand) and lucrative contacts while he was Ukraine's Ministry of Ecology and Energy.

21. After, Zlochevsky's term in office as Minister ended, the Ukrainian government was investigating Zlochevsky -- Burisma's owner -- over allegations of bribery, corruption, and mis-use of his governmental office.

22. JOSEPH ROBINETTE BIDEN, Jr. openly confessed to actions as the guest on a panel of the Council for Foreign Relations. The C-SPAN recording is from time stamp 50:30 to 58:00 on January 23, 2018. <https://www.c-span.org/video/?c4818165/joe-biden-confesses-bribery>.

23. As then Vice President of the United States, JOSEPH ROBINETTE BIDEN, Jr. boasted that he ordered Ukraine's previous president to fire the Ukraine's Prosecutor General or JOSEPH ROBINETTE BIDEN, Jr. would refuse Ukraine \$1 billion in loan guarantees from the United States, openly admitting on videotape:

“I remember going over (to Ukraine), convincing our team ... that we should be providing for loan guarantees. ... And I was supposed to announce that there was another billion-dollar loan guarantee. And I had gotten a commitment from (then Ukrainian President Petro Poroshenko) and from (then-Prime Minister Arseniy) Yatsenyuk that they would take action against the state prosecutor (Shokin). And they didn't...”

“They were walking out to a press conference. I said, nah, ... we're not going to give you the billion dollars. They said, 'You have no authority. You're not the president.' ... I said, call him. I said, I'm telling you, you're not getting the billion dollars. I said, you're not getting the billion. ... I looked at them and said, 'I'm leaving in six hours. If the prosecutor is not fired, you're not getting the money.' Well, son of a bitch. He got fired. And they put in place someone who was solid at the time.”

24. Biden recounted in that presentation to the CFR that Ukrainian officials expressed doubt that Biden had that authority.

25. Implicating Barack Obama, Biden told them to call President Obama to see if Biden was speaking for Obama in threatening to withhold \$1 billion of loan guarantees.

26. Ukraine then fired Ukrainian Prosecutor General Viktor Mikolajovich Shokin (who resigned on demand) as demanded by JOSEPH ROBINETTE BIDEN, Jr. upon the threat of the loss of \$1 billion in loan guarantees.

27. After Viktor Mikolajovich Shokin's removal as Ukrainian General Prosecutor, Shokin wrote, swore under oath, and filed an affidavit in an court case in Austria concerning Ukrainian citizen Dmitry Firtash ("DF").

28. In paragraph 38, Shokin testified by affidavit under oath:

38. The events relating to DF and Biden in 2015 reveal the extent of the US administration's interference with Ukrainian domestic affairs and the eagerness to exercise control with the aim of advancing US interests. An example confirming such interference is me being forced to resign from my role as General Prosecutor solely on the demands of the US Vice President, JOSEPH ROBINETTE BIDEN, Jr., because I refused to cease my probe into Burisma (in which Biden had significant interests), and because I would never have agreed to a politically motivated, unfounded criminal prosecution.

29. In paragraph 32, Shokin testified by affidavit under oath:

32. JOSEPH ROBINETTE BIDEN, Jr. was visiting Ukraine frequently at that time. He came again in December 2015. He met President Poroshenko on Sunday 6 December and addressed the Rada on Tuesday 8 December.

30. As chronicled by Soviet Mafia by Soviet-era journalist Arkady Vaksberg, anti-corruption drives within the political culture of the former Soviet Union – the legacy of the government of the Ukraine still lingering while JOSEPH ROBINETTE BIDEN, Jr. was Vice President -- are one gang of corrupt politicians using the legal system to target other, rival gangs, as competitors.

31. Ukrainian prosecutors after Viktor Mikolajovich Shokin's removal were investigating the Anti-Corruption Action Center, backed in part by George Soros' Open Society Foundation, as the source of the corruption in Ukraine. That is, Ukrainian investigators alleged that anti-corruption organizations were actually orchestrating the corruption.

32. As reported in The Hill, on March 26, 2019:

The prosecutors soon would learn the resistance they faced was blowing directly from the U.S. Embassy in Kiev, where the Obama administration took the rare step of trying to press the Ukrainian government to back off its investigation of both the U.S. aid and the group.

“The investigation into the Anti-Corruption Action Center (sic), based on the assistance they have received from us, is similarly misplaced,” then-embassy Charge d' Affaires George Kent wrote the prosecutor's office in April 2016 in a letter that also argued U.S. officials had no concerns about how the U.S. aid had been spent.

At the time, the nation's prosecutor general had just been fired, under pressure from the United States, and a permanent replacement had not been named.

33. Therefore, the Obama Administration – of which JOSEPH ROBINETTE BIDEN, Jr. was the point person for Ukraine – was intervening in dueling corruption investigations and trying to prevent investigation of corruption created and/or orchestrated by groups funded by George Soros' political organizations.

34. Thus, allegations that Ukraine's Prosecutor General Viktor Shokin was not prosecuting corruption ignore the possibility that Shokin was threatening one group within Ukraine's government as opposed to a different group.

35. Yuriy Vitaliyovych Lutsenko is a Ukrainian politician whose latest post was Prosecutor General of Ukraine after the removal of Viktor Shokin from 12 May 2016 until 29 August 2019.

36. As reported in the Hill, March 26, 2019, Lutsenko told U.S. reporter John Solomon that he was stunned when the ambassador “gave me a list of people whom we should not prosecute.”

37. In April 2014, Biden's son Hunter was added to the Board of Directors of Burisma Holdings, LLC, a Ukrainian energy company.

38. However, the main bribery, money-laundering, and criminality involved the owner of Burisma Holdings, LLC, not whether or not Burisma Holdings, LLC, itself had committed any wrong.

39. Burisma Holdings, LLC, paid ROBERT HUNTER BIDEN at least \$50,000 per month, or \$600,000 per year for a part-time job.

40. Investigator and author Peter Schweizer of the Government Accountability Institute reports from the documents that he uncovered that ROBERT HUNTER BIDEN was paid \$83,000 per month or \$ 996,000 per year.

41. Said payments to ROBERT HUNTER BIDEN of \$50,000 per month to \$83,000 per month were actually bribes paid by corrupt gangs of politicians and business oligarchs to the then Vice President of the United States JOSEPH ROBINETTE BIDEN, Jr.

42. Burisma’s corporate board met about once a quarter but no more than once a month.

43. ROBERT HUNTER BIDEN’s work responsibilities for Burisma Holdings, LLC, were a part-time job.

44. ROBERT HUNTER BIDEN did not speak Ukrainian (or even Russian), which would be necessary to advice, consult with, or oversee Burisma Holdings, LLC, in its corporate activities.

45. Given that ROBERT HUNTER BIDEN had no expertise, language skills for the Ukraine, or knowledge of the Ukraine or region, ROBERT HUNTER BIDEN's job was essentially a "no show" job in which ROBERT HUNTER BIDEN could not effectively participate in overseeing the work of Burisma Holdings, LLC, or allegedly working to improve it.

46. ROBERT HUNTER BIDEN could not read documents of the company in relation to his part-time job nor effectively ask questions of company officials, managers, or personnel other than what they chose to selectively reveal to him in English, concealing whatever they did not wish to share.

47. Therefore, ROBERT HUNTER BIDEN could not do the part-time job for which he was paid as much as \$83,000 per month, being unable to supervise, review, or guide the company in its company practice or methods.

48. ROBERT HUNTER BIDEN did not have any qualifications in energy or for the job.

49. ROBERT HUNTER BIDEN did not have any qualifications or experience with the country or economy of the Ukraine.

50. ROBERT HUNTER BIDEN had been recently discharged from the military due to drug use, making him unemployable at the level of a corporate board member at a fraction of the salary rates involved.

51. ROBERT HUNTER BIDEN's only qualification for the job was that his father JOSEPH ROBINETTE BIDEN, Jr. was Vice President of the United States of America, who had been put in charge by President Obama of the foreign policy of the United States with the Ukraine.

52. On May 13, 2014, at a State Department press briefing, AP reporter Matt Lee asked “Does this building diplomatically have any concerns about potential perceptions of conflict or/cronyism — which is what you’ve often accused the Russians of doing?”

53. “No, he’s a private citizen,” State Department spokeswoman Jen Psaki replied.

54. On December 11, 2015, a New York Times editorial praised Biden’s message to the Ukrainian government but added: “Burisma’s owner, Mykola Zlochevsky, has been under investigation in Britain and in Ukraine. It should be plain to ROBERT HUNTER BIDEN that any connection with a Ukrainian oligarch damages his father’s efforts to help Ukraine. This is not a board he should be sitting on.”

55. As compiled by the Federalist,

“A 2018 survey from FW Cook, a well-regarded executive compensation consulting firm, shows that of the companies in the S&P 500, large-cap companies, which are companies with a market value of more than \$10 billion, paid individual board members a median of \$275,000 a year. Among S&P 500 companies in the energy industry, board members were compensated with a median \$213,000 a year, with those in the 75th percentile of the salary range still only bringing in \$289,000, less than half of what ROBERT HUNTER BIDEN has been reported earning at Burisma.”

“Last week, Mark Hemingway of RealClearInvestigations reported on a study from Watchdog Research revealing that ROBERT HUNTER BIDEN was paid 12 times the amount expected at a similarly sized company, whose board members are typically paid about \$55,000 to \$83,000 for an entire year.”

56. The difference between the fair market value of ROBERT HUNTER BIDEN’s compensation for a part-time job and what he actually received constituted a bribe to JOSEPH ROBINETTE BIDEN, Jr..

57. On April 1, 2019, writing in The Hill, John Solomon quotes Ukrainian former prosecutor general Viktor Shokin, telling him that, before he was dismissed, he was leading a

wide-ranging corruption probe into Burisma Holdings, LLC, and that his plans included “interrogations and other crime-investigation procedures into all members of the executive board, including ROBERT HUNTER BIDEN.”

58. On May 20, 2019, The New York Times reported that [in 2013 or 2015] “[Christopher] Heinz argued to [Devon] Archer, who like ROBERT HUNTER BIDEN had joined Burisma’s board, that the posts created the appearance of selling influence, according to a person familiar with the conversation.”

59. Former Ukrainian Prosecutor General Shokin told the Washington Post via email: “All I can say is that the appointment of ROBERT HUNTER BIDEN as a member of the Board of Directors of the energy company is rather questionable from the point of view of effectiveness. After all, this person had no work experience either in Ukraine or in the energy sector. . . . The activities of Burisma, the involvement of his son, ROBERT HUNTER BIDEN, and the [prosecutor general’s office] investigators on his tail, are the only, I emphasize, the only motives for organizing my resignation.

60. Candidate for President Barack Obama chose Senator JOSEPH ROBINETTE BIDEN, Jr. to be his running mate as Vice President because Illinois State Senator Barack Obama was perceived as lacking foreign policy knowledge and experience while JOSEPH ROBINETTE BIDEN, Jr. was perceived and touted to the public as being an expert in foreign policy issues and the United States’ relationships with foreign countries.

61. While President, Barack Obama delegated to then Vice President JOSEPH ROBINETTE BIDEN, Jr. the lead role in the foreign policy of the United States government in all matters concerning the Ukraine, China, and other key foreign nations.

62. Therefore, the Grand Jury alleges that one of ROBERT HUNTER BIDEN’s

projects was to engage in money laundering and evasion of U.S. sanctions on behalf of wealthy foreign clients by disguising wealth from China, Russia, Romania, the Ukraine, and other countries as being respectable investments into the United States financial markets.

63. The Grand Jury alleges that one of ROBERT HUNTER BIDEN's projects was to help wealthy foreigners evade U.S. sanctions and introduce their money into the United States as seemingly legitimate investment funds.

64. As reported in The Federalist on September 23, 2020:

According to the joint report released by the Senate Homeland Security and Governmental Affairs Committee with the Senate Finance Committee, Rosemont Seneca, an investment firm co-founded by Hunter Biden received a \$3.5 million wire transfer from Elena Baturina in 2014 while his father, Joe Biden was vice president.

Baturina used to be married to Moscow Mayor Yuri Luzhkov who was fired in 2010 by then-Russian President Dmitry Medvedev over allegations of corruption benefiting Baturina's enterprises.

"Luzhkov used his position as mayor to approve over 20 real estate projects that were built by a Baturina-owned construction company and ultimately generated multibillion-ruble profits for his family," Senate investigators wrote.

65. This payment of \$3.5 million in U.S. dollars has never been explained, but the Grand Jury concludes and alleges that ROBERT HUNTER BIDEN was in the business (as one of his lines of business) of laundering funds for disreputable or corrupt individuals or funds from sources of illegal conduct and entering those funds into the U.S. financial markets, to allow the funds to be used outside of the source country and to appear to be legitimate funds invested through ROBERT HUNTER BIDEN's investment funds.

66. In the late Summer of 2006, ROBERT HUNTER BIDEN and his uncle, JAMES BIDEN, purchased the hedge fund Paradigm Global Advisors.

67. According to an unnamed executive quoted in Politico in August, 2019, JAMES BIDEN declared to employees of Paradigm Global Advisors on his first day, “Don’t worry about investors. We’ve got people all around the world who want to invest in JOSEPH ROBINETTE BIDEN, Jr..”

68. At that time in late 2019, JOSEPH ROBINETTE BIDEN, Jr. was months away from becoming chairman of the Senate Foreign Relations Committee and launching his second bid for president.

69. The unnamed executive who spoke as a news source to Politico charged that the purchase of the Paradigm Global Advisors fund was designed to work around campaign-finance laws.

70. JAMES BIDEN made it clear that he viewed the fund as a way to take money from rich foreigners who could not legally give money to his older brother or his campaign account. “We’ve got investors lined up in a line of 747s filled with cash ready to invest in this company,” the executive remembers JAMES BIDEN saying.

71. ROBERT HUNTER BIDEN has admitted the elements and details of the scheme of bribery and influence peddling centered on his father Joseph Robinette Biden, Jr. in many emails and text messages recovered, as reported in the Washington Examiner on October 24, 2020:

Hunter Biden went on a tirade in a June 2017 message to partner James Gilliar with complaints about Mr. Bobulinski.

“Explain to me one thing Tony brings to MY table that I so desperately need that I’m willing to sign over my family’s brand and pretty much the rest of my business life,” Hunter Biden says. “Why in gods name would I give this marginal bully the keys my family’s only asset? Why?”

The “only asset” appears to be a reference to the Biden name, or the father himself.

72. The Washington Examiner further reported on ROBERT HUNTER BIDEN’s emails:

Another was a May 2017 email from Mr. Gilliar to Hunter Biden and Mr. Bobulinski on a new venture with Mr. Ye in which a 10% stake would be “held by H for the big guy?”

Mr. Bobulinski says the “big guy” is the former vice president.

73. Thus Joseph Biden was planned to be and was an undisclosed owner of 10% of the new venture with energy oligarch Ye from China, which would require U.S. government approval of investments into the U.S. energy market.

74. As declared in a statement released on October 22, 2020, by ROBERT HUNTER BIDEN’s former business partner, Tony Bobulinski, ROBERT HUNTER BIDEN often referred to his father Joseph Biden as “my chairman and frequently referenced asking him [JOSEPH ROBINETTE BIDEN, Jr.] for his sign-off or advice on various potential deals that we were discussing.”

75. Up until that time in late 2006, ROBERT HUNTER BIDEN had been employed as a consultant to Delaware-based bank MBNA, earning a \$100,000 per year, according to the New York Times.

76. MBNA bank hired ROBERT HUNTER BIDEN fresh out of law school in 1996.

77. MBNA bank had already been a major contributor to JOSEPH ROBINETTE BIDEN, Jr.’s political election campaigns when MBNA bank hired JOSEPH ROBINETTE BIDEN, Jr.’s son ROBERT HUNTER BIDEN in 1996.

78. In less than two years MBNA bank promoted ROBERT HUNTER BIDEN to senior vice president.

79. Biden also separately worked as a lobbyist until 2008, founding the firm Oldaker Biden & Belair.

80. While ROBERT HUNTER BIDEN worked for MBNA, he had no experience working for a hedge fund or investment firm prior to creating his own.

81. On January 7, 2007, JOSEPH ROBINETTE BIDEN, Jr. announced his second bid for the presidency.

82. On January 18, 2007, ROBERT HUNTER BIDEN stepped down as interim chief executive of Paradigm Global Advisors, but the company announced he will remain in his position as chairman of Paradigm's advisory board.

83. On January 3, 2008, after winning under one percent in the Iowa caucus, JOSEPH ROBINETTE BIDEN, Jr. ended his second bid for the presidency.

84. On August 23, 2008, Democrat nominee for President Barack Obama named JOSEPH ROBINETTE BIDEN, Jr. as his running mate as Vice President.

85. In September 2008, ROBERT HUNTER BIDEN founded Seneca Global Advisors, calling itself "a boutique consulting firm" which "helps small and mid-sized companies expand into markets in the U.S. and other countries."

86. On January 20, 2009, JOSEPH ROBINETTE BIDEN, Jr. was sworn in as Vice President of the United States.

87. In June 2009, ROBERT HUNTER BIDEN co-founded Rosemont Seneca Partners, with Christopher Heinz (the stepson of John Kerry and heir to the Heinz fortune) and Devon Archer, who had been friends with Heinz at Yale.

88. During 2010 and 2011, Rosemont Seneca grew rapidly through its unusual ability to secure meetings with wealthy Chinese investors.

89. Representing Rosemont Seneca in China in April 2010, ROBERT HUNTER BIDEN met with senior officials of important state enterprises including the Postal Savings Bank, China Investment Corp., and Founder Group.

90. ROBERT HUNTER BIDEN was joined on the April 2010 trip by James Bulger, the politically connected co-founder of the Thornton Group, an Asia-oriented financial services firm.

91. From Peter Schweitzer’s *Secret Empires: How the American Political Class Hides Corruption and Enriches Family and Friends*:

Less than a year after opening Rosemont Seneca’s doors, Hunter Biden and Devon Archer were in China having secured access at the highest levels. Thornton Group’s account of the meeting on their Chinese-language website is telling: Chinese executives “extended their warm welcome” to the “Thornton Group, with its U.S. partner Rosemont Seneca chairman Hunter Biden (second son of the now Vice President Joe Biden).” The purpose of the meetings was to “explore the possibility of commercial cooperation and opportunity.” Curiously, details about the meeting do not appear on their English-language website.

Also, according to the Thornton Group, the three Americans met with the largest and most powerful government-fund leaders in China — even though Rosemont was both new and small. To put these meetings in perspective, it was as if the son of the Chinese premier held a single meeting with the heads of Goldman Sachs, Bank of America, J.P. Morgan, Merrill Lynch, and Blackstone. Except, in this case, these were government entities with trillions of dollars of capital to invest. The delegate spent two days meeting with the top executives of China’s sovereign wealth fund, social-security fund, and largest banks.

Hunter posed with them for a series of pictures.

92. As reported in [Breitbart](#), on October 16, 2020, the Grand Jury charges that:

In a 2011 email, Hunter Biden’s business associates also discussed developing relations with what one called “China Inc.” as part of a “new push on soft diplomacy for the Chinese.”

These emails are completely unconnected to the Hunter Biden emails being released by the *New York Post*.

These and more explosive never-before-revealed emails were provided to Schweizer by Bevan Cooney, a one-time Hunter Biden and Devon Archer business associate. Cooney is currently in prison serving a sentence for his involvement in a 2016 bond fraud investment scheme

In 2019, Cooney reached out to Schweizer after becoming familiar with the revelations in his 2018 book *Secret Empires*. Cooney explained that he believes he was the “fall guy” for the fraud scheme and that Archer and Hunter Biden had avoided responsibility.

93. As reported in [Breitbart](#), on October 16, 2020, the Grand Jury charges that:

The emails offer a unique window into just how the Biden universe conducted business during the Obama-Biden Administration. These associates sought to trade on Hunter Biden’s relationship with, and access to, his father and the Obama-Biden White House in order to generate business.

94. As reported in [Breitbart](#), on October 16, 2020, the Grand Jury charges that:

For instance, on November 5, 2011, one of Archer’s business contacts forwarded him an email teasing an opportunity to gain “potentially outstanding new clients” by helping to arrange White House meetings for a group of Chinese executives and government officials. The group was the China Entrepreneur Club (CEC) and the delegation included Chinese billionaires, Chinese Communist Party loyalists, and at least one “respected diplomat” from Beijing. Despite its benign name, CEC has been called “a second foreign ministry” for the People’s Republic of China—a communist government that closely controls most businesses in its country. CEC was established in 2006 by a group of businessmen and Chinese government diplomats.

95. As reported in [Breitbart](#), on October 16, 2020, the Grand Jury charges that:

Before contacting Hunter Biden’s associates, the CEC had been trying to get meetings with top Obama-Biden administration officials to no avail. “From the DC side as you will see below they [CEC] have written letters to several members of the administration and others and have so far not had a strong reaction.”

“This is China Inc,” wrote Khashoggi in the email, referring to the delegation of Chinese billionaires.

“Biggest priority for the CEC group is to see the White House, and have a senior US politician, or senior member of Obama’s administration, give them a tour... If your friend in DC can help, we would be extremely grateful,” Khashoggi emphasized.

Hunter Biden and Devon Archer apparently delivered for the Chinese Communist Party-connected industrial elites within ten days.

96. The New Yorker reported that during 2012, Devon Archer and ROBERT HUNTER BIDEN began meetings with “Jonathan Li, who ran a Chinese private-equity fund, Bohai Capital, about becoming partners in a new company that would invest Chinese capital” in the United States.

97. New York Times business columnist Andrew Ross Sorkin wrote in his August 19, 2013, column, “In Washington, the line between lobbying and bribery is not clear-cut. Until 2008, R. ROBERT HUNTER BIDEN, son of then-Senator Joseph R. Biden Jr., lobbied Congress regularly.”

98. ROBERT HUNTER BIDEN joined his father JOSEPH ROBINETTE BIDEN, Jr. on a very long trip to China from the Washington, D.C. area on board prestigious Air Force Two beginning around December 4, 2013.

99. On this December 4, 2013, trip to China, Joseph R. Biden planned to meet with Chinese president Xi Jinping on behalf of the United States of America.

100. On this December 2013 trip to China, ROBERT HUNTER BIDEN arranged for Jonathan Li of Bohai Capital to shake hands with his father JOSEPH ROBINETTE BIDEN, Jr. in the lobby of the American delegation’s hotel.

101. Less than two weeks after Vice President JOSEPH ROBINETTE BIDEN, Jr.'s

trip to China with his son ROBERT HUNTER BIDEN, in December 2013, ROBERT HUNTER BIDEN's firm signed a \$1 billion private equity deal with a subsidiary of the Chinese government's Bank of China," according to author and investigator Peter Schweizer.

102. The deal was later expanded to \$1.5 billion of funds from businesses and rich individuals in China to be invested in the United States financial markets.

103. The Grand Jury concludes and alleges that one aspect of this \$1.5 billion deal was to launder the source of funds and make funds in the U.S. financial markets appear to be legitimate investments, as well as to purchase and influence U.S. companies.

104. However, in addition, the Chinese government entrusting \$1.5 billion to ROBERT HUNTER BIDEN's management rather than to well-established, proven investment companies and holding funds will (eventually when investments are cashed out if not before) earn ROBERT HUNTER BIDEN many millions of dollars in fees.

105. Compared to major and well-known investment companies, ROBERT HUNTER BIDEN had comparatively little experience in managing small investments much less \$1.5 billion.

106. Furthermore, investments in the U.S. energy markets by foreign companies or foreign investors would normally require approval by the U.S. Government, as explained in Forbes on August 13, 2018.

107. Therefore, at least general approval of the Vice President of the United States, JOSEPH ROBINETTE BIDEN, Jr., delegated the responsibility for the countries at issue by President Obama, would be a valuable aspect of an investment in the U.S. energy markets by foreigners.

108. Under China's government, legal system, and political system, all private

companies are subject to the will of China's government the Chinese Community Party.

109. Between December 2016 and April 14, 2007, ROBERT HUNTER BIDEN meets the Chinese energy tycoon Ye Jianming. As CNN described, "at its height, Ye's company, CEFC China Energy, aligned itself so closely with the Chinese government that it was often hard to distinguish between the two."

110. In May 2017, Chinese energy oligarch Ye Jianming and ROBERT HUNTER BIDEN met privately at a hotel in Miami, Florida.

111. ROBERT HUNTER BIDEN said that he offered to use his contacts to help "identify investment opportunities for Ye's company CEFC China Energy, in liquified natural gas projects in the United States."

112. After the dinner, Ye sent a 2.8-carat diamond to ROBERT HUNTER BIDEN's hotel room with a card thanking him for the meeting.

113. ROBERT HUNTER BIDEN and his divorcing ex-wife Kathleen dispute the value of the diamond; he valued it at \$10,000, she valued it at \$80,000.

114. In the Summer of 2017, ROBERT HUNTER BIDEN began negotiating a deal for Ye's company CEFC to invest in a liquefied-natural-gas project in Louisiana.

115. In October 2017, after having an unpaid role on BHR's board since 2013, ROBERT HUNTER BIDEN acquired a 10 percent equity interest worth \$430,000 as of July 2019 in BHR.

116. According to business records and ROBERT HUNTER BIDEN's lawyer, George Mesires, at least half of the firm is owned by Chinese entities.

117. On November 18, 2017, Patrick Ho was arrested at John F. Kennedy International Airport on bribery and money-laundering charges. He called JAMES BIDEN, JOSEPH

ROBINETTE BIDEN, Jr.'s younger brother, asking Biden to arrange a lawyer.

II. COUNTS

COUNT ONE

Solicitation of or Demand for a Bribe by Government Official (18 U.S.C. §201(c)(1)(B))

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

119. This Count is brought against JOSEPH ROBINETTE BIDEN, then Vice President of the United States, and his agents ROBERT HUNTER BIDEN and JAMES BIDEN at the time of these violations.

120. 18 U.S. Code § 201(c) requires that:

(a) For the purpose of this section—

- (1) the term “public official” means Member of Congress, Delegate, or Resident Commissioner, either before or after such official has qualified, or an officer or employee or person acting for or on behalf of the United States, or any department, agency or branch of Government thereof, including the District of Columbia, in any official function, under or by authority of any such department, agency, or branch of Government, or a juror;
- (2) the term “person who has been selected to be a public official” means any person who has been nominated or appointed to be a public official, or has been officially informed that such person will be so nominated or appointed; and
- (3) the term “official act” means any decision or action on any question, matter, cause, suit, proceeding or controversy, which may at any time be pending, or which may by law be brought before any public official, in such official’s official capacity, or in such official’s place of trust or profit.

* * *

(b) Whoever—

* * *

- (2) being a public official or person selected to be a public official, directly or indirectly, corruptly demands, seeks, receives, accepts, or agrees to receive or accept anything of

value personally or for any other person or entity, in return for:

- (A) being influenced in the performance of any official act;
- (B) being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States; or
- (C) being induced to do or omit to do any act in violation of the official duty of such official or person;

* * *

(c)Whoever—

* * *

(1)otherwise than as provided by law for the proper discharge of official duty—

* * *

(B)being a public official, former public official, or person selected to be a public official, otherwise than as provided by law for the proper discharge of official duty, directly or indirectly demands, seeks, receives, accepts, or agrees to receive or accept anything of value personally for or because of any official act performed or to be performed by such official or person;

121. JOSEPH ROBINETTE BIDEN himself and acting through is agents HUNTER and JAMES BIDEN knowingly and willfully received monetary bribes from government-controlled enterprises and/or business interests and oligarchs in the Ukraine and China and other countries, which he laundered to route to the Vice President of the United States JOSEPH ROBINETTE BIDEN, Jr.

122. HUNTER AND JAMES BIDEN knowingly and willfully received monetary bribes from government-controlled enterprises and/or business interests and oligarchs in the Ukraine and China and other countries, which they laundered to route to the Vice President of the United States JOSEPH ROBINETTE BIDEN, Jr.

123. Vice President of the United States JOSEPH ROBINETTE BIDEN, Jr. knowingly and willfully received monetary bribes from government-controlled enterprises

and/or business interests and oligarchs in the Ukraine and China and likely other countries, which were laundered through his son ROBERT HUNTER BIDEN and brother JAMES BIDEN.

124. Vice President of the United States JOSEPH ROBINETTE BIDEN, Jr. acted upon those bribes by altering U.S. foreign policy for the benefit of the bribery payors, including removing the national Prosecutor General of the Ukraine Viktor Shokin, overstepping the USA's national authority over the Ukraine, to protect certain corrupt groups and misdirecting prosecutorial investigations to other, rival corrupt groups associated with the owner of Burisma Holdings, LLC, and supporting George Soros' organizations within the Ukraine suspected of furthering the corruption with Ukraine, and getting one of the country's most notorious mob bankers, Ihor Kolomoisky, off the U.S. government visa ban list.

125. Vice President of the United States JOSEPH ROBINETTE BIDEN, Jr. acted upon those bribes by altering U.S. foreign policy for the benefit of the bribery payors, including defending China and Chinese interests and furthering and promoting China's business interests and territorial expansion.

126. For example, the Grand Jury charges that as reported on NBC News, on May 2, 2019, JOSEPH ROBINETTE BIDEN defended China by saying:

Democratic presidential candidate Joe Biden said Wednesday night that China was "not competition" for the U.S., prompting blowback from prominent members of both political parties.

At an event in Iowa City, Biden was explaining why he believes concerns that China could eventually surpass the U.S. as a world superpower and economic force are overstated.

"China is going to eat our lunch? Come on, man," the former vice president said.

"I mean, you know, they're not bad folks, folks. But guess what? They're not competition for us," he added.

Biden said that the problems facing China are far greater than those facing the United States and that he didn't know a "single solitary" world leader who would prefer to deal with China's challenges over America's.

"They can't even figure out how to deal with the fact that they have this great division between the China Sea and the mountains in the east, I mean the west," Biden said without elaborating further, in an apparent reference to the South China Sea. "They can't figure out how they're going to deal with the corruption that exists within the system."

127. Thus, JOSEPH ROBINETTE BIDEN deceived the American people and prevent scrutiny and preparation against the military and economic threats posed by China by trying to persuade government leaders, political leaders, and the public that China poses no threat to the United States.

128. When President Donald Trump blocked flights from China during the early days of the coronavirus outbreak, Biden accused him of "xenophobic fear-mongering" and labeled President Trump a "racist" for calling the disease the "Wuhan virus."

129. JOSEPH ROBINETTE BIDEN, Jr. accepted bribes to influence his future actions in favor of China and the Ukraine if elected President.

130. JOSEPH ROBINETTE BIDEN, Jr., ROBERT HUNTER BIDEN, and JAMES BIDEN all participated in this scheme to corruptly funnel bribes from foreign countries and business interests to U.S. Senator and later Vice President Joseph Biden to influence Joseph Biden in the conduct of his duties assigned on behalf of the United States of America.

COUNT TWO

Acceptance of a Gratuity by Government Personnel

(48 CFR § 3.101-2)

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

herein.

132. 48 CFR § 3.101-2 requires that:

48 CFR § 3.101-2 - Solicitation and acceptance of gratuities by Government personnel (and their agents).

As a rule, no Government employee may solicit or accept, directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of monetary value from anyone who (a) has or is seeking to obtain Government business with the employee's agency, (b) conducts activities that are regulated by the employee's agency, or (c) has interests that may be substantially affected by the performance or nonperformance of the employee's official duties. Certain limited exceptions are authorized in agency regulations.

133. As set forth in Count One, JOSEPH ROBINETTE BIDEN, Jr. accepted financial bribes through his son ROBERT HUNTER BIDEN AND JAMES BIDEN on JOSEPH ROBINETTE BIDEN'S behalf.

134. JOSEPH ROBINETTE BIDEN, Jr. accepted gratuities to alter his conduct of governmental actions and authority in his position of Vice President

135. JOSEPH ROBINETTE BIDEN, Jr. accepted gratuities to influence his future actions in favor of China and the Ukraine if elected President.

136. JOSEPH ROBINETTE BIDEN, Jr., ROBERT HUNTER BIDEN, and JAMES BIDEN all participated in this scheme to corruptly funnel gratuities (bribes) from foreign countries and business interests to U.S. Senator and later Vice President JOSEPH ROBINETTE BIDEN to influence him in the conduct of his duties assigned on behalf of the United States of America.

COUNT THREE
Money Laundering
(18 U.S. Code § 1956)

137. The previous allegations of the entirety of this Indictment are repeated and re-

alleged as incorporated herein with the same force and effect as if fully set forth herein.

138. 18 U.S. Code § 1956 requires that:

(a)

(1) Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity—

(A)

(i) with the intent to promote the carrying on of specified unlawful activity; or

(ii) with intent to engage in conduct constituting a violation of section 7201 or 7206 of the Internal Revenue Code of 1986; or

(B) knowing that the transaction is designed in whole or in part—

(i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; or

(ii) to avoid a transaction reporting requirement under State or Federal law,

shall be sentenced to a fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than twenty years, or both. For purposes of this paragraph, a financial transaction shall be considered to be one involving the proceeds of specified unlawful activity if it is part of a set of parallel or dependent transactions, any one of which involves the proceeds of specified unlawful activity, and all of which are part of a single plan or arrangement.

(2) Whoever transports, transmits, or transfers, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States—

(A) with the intent to promote the carrying on of specified unlawful activity; or

(B) knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer is designed

in whole or in part—

(i)to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; or

(ii)to avoid a transaction reporting requirement under State or Federal law,

shall be sentenced to a fine of not more than \$500,000 or twice the value of the monetary instrument or funds involved in the transportation, transmission, or transfer, whichever is greater, or imprisonment for not more than twenty years, or both. For the purpose of the offense described in subparagraph (B), the defendant's knowledge may be established by proof that a law enforcement officer represented the matter specified in subparagraph (B) as true, and the defendant's subsequent statements or actions indicate that the defendant believed such representations to be true.

(3)Whoever, with the intent—

(A)to promote the carrying on of specified unlawful activity;

(B)to conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity; or

(C)to avoid a transaction reporting requirement under State or Federal law,

conducts or attempts to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity, or property used to conduct or facilitate specified unlawful activity, shall be fined under this title or imprisoned for not more than 20 years, or both. For purposes of this paragraph and paragraph (2), the term "represented" means any representation made by a law enforcement officer or by another person at the direction of, or with the approval of, a Federal official authorized to investigate or prosecute violations of this section.

139. At the request of and with the knowledge and participation of then Vice President JOSEPH ROBINETTE BIDEN, Jr., his son ROBERT HUNTER BIDEN, JAMES BIDEN and ROBERT HUNTER BIDEN'S associates such as DEVON ARCHER took bribes meant for the Vice President channeled through ROBERT HUNTER BIDEN and JAMES BIDEN disguised as

investments, business deals, and provided half of these funds to JOSEPH ROBINETTE BIDEN, Jr.

140. Moreover, ROBERT HUNTER BIDEN and JAMES BIDEN, and others took money on behalf of and funneled monies to JOSEPH ROBINETTE BIDEN from foreign sources as investments to be managed in U.S. investments in the U.S. capital markets to evade U.S. sanctions and/or disguise the results of illegal activity (including conversion of their foreign country's government resources and/or embezzlement) as legitimate investment accounts within the U.S. financial markets.

141. JOSEPH ROBINETTE BIDEN, Jr., ROBERT HUNTER BIDEN, and JAMES BIDEN all participated in this scheme to corruptly funnel bribes from foreign countries and business interests to U.S. Senator and later Vice President Joseph Biden, disguised as managing investment funds, to influence JOSEPH ROBINETTE BIDEN in the conduct of his duties assigned on behalf of the United States of America.

COUNT FOUR
Foreign Agents Act Registration Act
(22 U.S. Code § 612)

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

143. 22 U.S. Code § 612 requires that:

(a) Filing; contents

No person shall act as an agent of a foreign principal unless he has filed with the Attorney General a true and complete registration statement and supplements thereto as required by subsections (a) and (b) of this section or unless he is exempt from registration under the provisions of this subchapter. Except as hereinafter provided, every person who becomes an agent of a foreign principal shall, within ten days thereafter, file with the Attorney General, in duplicate, a registration statement, under oath on a form prescribed by the Attorney General. The

obligation of an agent of a foreign principal to file a registration statement shall, after the tenth day of his becoming such agent, continue from day to day, and termination of such status shall not relieve such agent from his obligation to file a registration statement for the period during which he was an agent of a foreign principal.

* * *

144. ROBERT HUNTER BIDEN represented the interests of China and certain factions within the Ukraine as well as foreign businesses to influence U.S. Government actions and foreign policy in return for payment by the same for his services.

145. ROBERT HUNTER BIDEN did not register as a foreign agent as required by FARA within the relevant time periods, but illegally acted as a foreign agent representing the interests of foreign countries to influence the actions or omissions of actions to benefit foreign countries and wealthy businesses and oligarchs politically connected in those foreign countries.

146. JAMES BIDEN represented the interests of China and certain factions within the Ukraine as well as foreign businesses to influence U.S. Government actions and foreign policy in return for payment by the same for his services.

147. JAMES BIDEN did not register as a foreign agent as required by FARA within the relevant time periods, but illegally acted as a foreign agent representing the interests of foreign countries to influence the actions or omissions of actions to benefit foreign countries and wealthy businesses and oligarchs politically connected in those foreign countries.

148. JOSEPH ROBINETTE BIDEN, Jr. did not register as a foreign agent as required by FARA within the relevant time periods.

COUNT FIVE
Honest Services Fraud
(18 U.S.C. § 1346)

149. The previous allegations of the entirety of this Indictment are repeated and re-

alleged as incorporated herein with the same force and effect as if fully set forth herein.

150. Honest services fraud is defined in federal statute 18 U.S.C. §1346 as a scheme to defraud another of the intangible right to honest services through a scheme to violate a fiduciary duty by bribery or kickbacks. A fiduciary duty is a duty to act only for the benefit of the public, an employer, shareholders, or a union. The statute was created by Congress as a response to the government's limitation in its use of the wire fraud statute.

151. Defendant JOSEPH ROBINETTE BIDEN, Jr. had a fiduciary duty to the public as a public official and to the United States of America as its Vice President to perform duties and obligations on behalf of the United States for the benefit of the United States of America.

152. JOSEPH ROBINETTE BIDEN, Jr. knowingly devised and also participated in a scheme to defraud and that is intended to deceive or cheat the public and to deprive the public of the intangible right to honest services through bribery or kickbacks.

153. JOSEPH ROBINETTE BIDEN, Jr. acted with the intent to defraud.

154. JOSEPH ROBINETTE BIDEN, Jr.'s scheme to defraud involved a materially false or fraudulent pretense, representation, or promise, including omission and concealment of material information capable of influencing the decision of others.

155. JOSEPH ROBINETTE BIDEN, Jr. violated his fiduciary duty by a continuing scheme of bribery and/or kick-backs.

156. The public and the United States of America were harmed by this scheme by of its right to receive Joseph Biden's honest services as Vice President.

157. Various third parties being corrupt businesses and oligarchs in China and the Ukraine often as affiliates of their country's governments who were not deceived by the scheme provided bribes and/or kick-backs to JOSEPH ROBINETTE BIDEN, Jr.

COUNT SIX
Wire Fraud
(18 U.S.C. § 1346)

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

159. 18 U.S. Code § 1343 requires that:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.

160. Defendants JOSEPH ROBINETTE BIDEN, ROBERT HUNTER BIDEN, and JAMES BIDEN acting in concert devised an on-going scheme undertaken for many years to solicit and receive bribes and to sell access to JOSEPH ROBINETTE BIDEN as a U.S. Senator and then Vice President of the United States.

161. In carrying out this scheme JOSEPH ROBINETTE BIDEN, ROBERT HUNTER BIDEN and JAMES BIDEN acted in concert by false and fraudulent pretenses and representations.

162. In carrying out this scheme, JOSEPH ROBINETTE BIDEN, ROBERT HUNTER BIDEN and JAMES BIDEN acting in concert participated in and affected international commerce and interstate commerce.

163. In carrying out this scheme, Defendants JOSEPH ROBINETTE BIDEN, Jr., ROBERT HUNTER BIDEN, and JAMES BIDEN communicated fraudulent and false misrepresentations by means of wire communications.

COUNT SEVEN
Racketeer Influenced and Corrupt Organization Act
(18 U.S.C. 1961-68)

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

165. JOSEPH ROBINETTE BIDEN, ROBERT HUNTER BIDEN and JAMES BIDEN maintained a scheme of influence peddling which was a de facto RICO enterprise.

166. The RICO enterprise engaged in, or its activities affected, interstate or foreign commerce.

167. The JOSEPH ROBINETTE BIDEN, ROBERT HUNTER BIDEN and JAMES BIDEN acting in concert conceived, planned, and ran the enterprise.

168. The JOSEPH ROBINETTE BIDEN, ROBERT HUNTER BIDEN and JAMES BIDEN acting in concert conducted or participated, either directly or indirectly, in the conduct of the affairs of the enterprise.

169. The Defendants JOSEPH ROBINETTE BIDEN, Jr., ROBERT HUNTER BIDEN, and JAMES BIDEN all acting in concert participated in the affairs of the enterprise through a pattern of racketeering activity or collection of an unlawful debt, specifically soliciting bribes, receiving bribes, and influence peddling for personal gain.

COUNT EIGHT
Seditious Conspiracy
(18 U.S.C. 115)

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

171. The **criminal act** element required for sedition is either advocating, aiding, organizing or publishing, or circulating written matter that advocates, aids, or teaches the

overthrow of the US government or any state, district, or territory thereof
by *force or violence* (18 U.S.C. § 2385, 2011).

172. JOSEPH ROBINETTE BIDEN, Jr. advocated for the overthrow of the U.S. Government by supporting, promoting, and defending anarchist riots and insurrection led by self-avowed, trained communist revolutionaries, and opposing efforts to restrain, police, or prosecute the rioters, from the riots in Ferguson, Missouri, in 2014 and up through riots in Portland, Oregon, in February of 2021, and thereafter.

173. JOSEPH ROBINETTE BIDEN as Vice President, a presidential candidate and now as president has solicited and taken bribes from and supported and furthered the objectives enemies of the United States such as the People's Republic of China, a communist regime, bent on destroying and overthrowing the government of the United States through pandemics such as Covid-19 and other nefarious and criminal means.

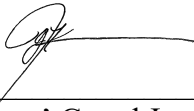
A TRUE BILL

Deborah Elynn Baber
FOREPERSON

Date: October 14, 2021

LARRY KLAYMAN

Verified by PDFFiller

A handwritten signature in black ink, appearing to be 'L. Klayman', written over a horizontal line.

Citizens' Grand Jury Prosecutor