

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
JULIAN PAUL ASSANGE,)
)
Defendant.)
)
)
_____)

Case No. **CR - 24 - 00014**

Count One:
Title 18, U.S.C. § 793(g), Conspiracy To
Obtain and Disclose National Defense
Information

FILED
Clerk
District Court

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

JUN 25 2024

GENERAL ALLEGATIONS

for the Northern Mariana Islands
By JP
(Deputy Clerk)

THE DEFENDANT AND CO-CONSPIRATOR

1. The defendant, JULIAN PAUL ASSANGE (“ASSANGE”), was not a United States citizen, did not possess a U.S. security clearance, and did not have authorization to possess, access, or control documents, writings, or notes relating to the national defense of the United States, including United States government classified information.

2. Chelsea Manning (“Manning”) was a United States Army intelligence analyst who held a TOP SECRET U.S. security clearance who was deployed to Forward Operating Base Hammer in Iraq.

CLASSIFIED INFORMATION

3. Pursuant to Executive Order 12958 signed on April 17, 1995, as amended by Executive Order 13292 on March 25, 2003, and Executive Order 13526 on December 29, 2009, national security information was classified as “TOP SECRET,” “SECRET,” or

“CONFIDENTIAL.” National security information was information owned by, produced by, produced for, and under the control of the United States government that was classified as follows:

- a. Information was classified as TOP SECRET if the unauthorized disclosure of that information reasonably could be expected to cause exceptionally grave damage to the national security that the original classification authority was able to identify and describe.
- b. Information was classified as SECRET if the unauthorized disclosure of that information reasonably could be expected to cause serious damage to the national security that the original classification authority was able to identify and describe.
- c. Information was classified as CONFIDENTIAL if the unauthorized disclosure of that information reasonably could be expected to cause damage to the national security that the original classification authority was able to identify and describe.
4. Information classified at any level could only be lawfully accessed by persons determined by an appropriate United States government official to be eligible for access to classified information, who had signed an approved non-disclosure agreement, who received a security clearance, and who had a “need to know” the classified information. Classified information could only be stored in an approved facility and container.

COUNT ONE

Conspiracy to Obtain and Disclose National Defense Information
18 U.S.C. § 793(g)

5. Paragraphs 1-4 of this information are incorporated by reference and realleged as if set forth fully herein.
6. From at least 2009 and continuing through at least 2011, in an offense begun and committed outside of the jurisdiction of any particular state or district of the United States, the

defendant, JULIAN PAUL ASSANGE, who will be first brought to the District of the Northern Mariana Islands, knowingly and unlawfully conspired with Chelsea Manning to commit the following offenses against the United States:

- a. To receive and obtain documents, writings, and notes connected with the national defense, including such materials classified up to the SECRET level, for the purpose of obtaining information respecting the national defense, and knowing and with reason to believe at the time such materials were received and obtained, they had been and would be taken, obtained, and disposed of by a person contrary to the provisions of Chapter 37 of Title 18 of the United States Code, in violation of Title 18, United States Code, Section 793(c);
- b. To willfully communicate documents relating to the national defense, including documents classified up to the SECRET level, from persons having lawful possession of or access to such documents, to persons not entitled to receive them, in violation of Title 18, United States Code, Section 793(d); and
- c. To willfully communicate documents relating to the national defense from persons in unauthorized possession of such documents to persons not entitled to receive them, in violation of Title 18, United States Code, Section 793(e).

7. In furtherance of the conspiracy, and to accomplish its objects, ASSANGE and Manning committed lawful and unlawful overt acts.

(All in violation of Title 18, United States Code, Section 793(g))

SHAWN N. ANDERSON
United States Attorney
Districts of Guam and the NMI

By: **Shawn N. Anderson** Digitally signed by Shawn N. Anderson
Date: 2024.06.25 01:49:49 +10'00'

Shawn N. Anderson
United States Attorney

Matthew McKenzie
Deputy Chief
Jacques Singer-Emery
Trial Attorney
National Security Division
U.S. Department of Justice