FILED
Oct 30 2026
Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America
v.

IGOR D'IU

Defendant(s)

Case No. 3:26-mj-71410-MAG

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2026 and others in the county of San Francisco and elsewhere in the Northern District of California, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 371	Conspiracy to Act as Agent of a Foreign Government
18 U.S.C. § 951	Acting as Agent of Foreign Government
18 U.S.C. § 2261A(1)(B)	Interstate Stalking

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Winston Wong, Federal Bureau of Investigation

☑ Continued on the attached sheet.

/s
Complainant's signature

Approved as to form Alexis James
AUSA Alexis James

FBI Special Agent Winston Wong
Printed name and title

Sworn to before me by telephone.

Date: 10/29/2026

Judge's signature

City and state: San Francisco, CA

Hon. Alex G. Tse, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Winston Wong, Special Agent, Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I make this affidavit in support of an application under Rules 3, 4, and 4.1 of the Federal Rules of Criminal Procedure for an arrest warrant and criminal complaint charging Igor D'iu ("**D'IU**") with violations of the following offenses:

a. Count One: 18 U.S.C. § 371 – Conspiracy to Act as an Agent of a Foreign Government, that is, in violation of 18 U.S.C. § 951, occurring between on or about July 31, 2026, and on or about October 8, 2026, in the Northern District of California;

b. Count Two: 18 U.S.C. § 951 – Acting as an Agent of a Foreign Government, occurring between on or about July 31, 2026, and on or about October 8, 2026, in the Northern District of California; and

c. Count Three: 18 U.S.C. § 2261A(1)(B) – Interstate Stalking, occurring on or about September 3, 2026, in the Northern District of California.

SOURCES OF INFORMATION

2. The facts set forth in this affidavit are based upon my personal observations; my training, experience, and research; documents and other records obtained in the investigation; and information obtained from various law enforcement personnel and witnesses. Where statements made by other individuals (including other Special Agents and law enforcement officers) are referenced in this affidavit, such statements are described in sum and substance and in relevant part. Similarly, where information contained in reports and other documents or records is referenced in this affidavit, such information is also described in sum and substance and in relevant part.

3. Because this affidavit is submitted for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant, I have not included each and every

fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant. The following is true to the best of my knowledge and belief.

AFFIANT BACKGROUND

4. I am a Special Agent with the FBI and have been so employed since August 2025. I am currently assigned to FBI's San Francisco Field Division. My current assignment includes investigating a variety of criminal and national security matters, including violent and financial crimes, as well as organized crime and crimes such as international stalking. Before becoming a Special Agent, I practiced tax and corporate law and civil litigation. I have a law degree from the University of Hawaii and master's and bachelor's degrees in accounting from the University of Denver.

5. My training included 19 weeks at the FBI Academy in Quantico, Virginia. This training included instruction in a variety of investigative methods, including counterterrorism, drug investigations, financial investigations and money-laundering, undercover operations, and electronic and physical surveillance procedures. This training also involved instruction on legal matters, including topics such as the Fourth Amendment, searches, seizures, search warrant affidavits, and the probable cause legal standard.

6. As an FBI agent, I am authorized to investigate violations of United States law and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States. I am an investigator and law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). I am empowered by law to conduct investigations, to execute search warrants, and to make arrests for offenses of Federal law, including offenses proscribed in 18 U.S.C. §§ 371, 951, and 2261A.

APPLICABLE STATUTES

7. Title 18, United States Code, Section 371, provides in relevant part that it is unlawful for "two or more persons [to] conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose,

and one or more of such persons do any act to effect the object of the conspiracy[.]"

8. Title 18, United States Code, Section 951, provides in relevant part that it is unlawful for "[w]hoever, other than a diplomatic or consular officer or attaché, [to act] in the United States as an agent of a foreign government without prior notification to the Attorney General if required[.]" With several exceptions not applicable here, Section 951 defines the term "agent of a foreign government" as "an individual who agrees to operate within the United States subject to the direction or control of a foreign government or official." 18 U.S.C. § 951(d).

9. Title 18, United States Code, Section 2261A(1)(B), provides in relevant part that it is unlawful to travel in interstate or foreign commerce "with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, and in the course of, or as a result of, such travel or presence engage[] in conduct that … causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress" to the person or their spouse, intimate partner, or family member.

FACTS SUPPORTING PROBABLE CAUSE

10. As set forth in the affidavit below, D'IU is a Russian citizen who unlawfully entered the United States sometime in or around June or July 2026, without any active or approved visas. D'IU received taskings and significant resources to research and stalk employees of a large technology and defense company (the "Company"), a company with offices in the Northern District of California, in order to gather information for his home country of Russia. Open-source records and news outlets describe the Company as having links to the war between Russia and Ukraine. In connection with these activities, D'IU followed Company employees, deployed electronic surveillance devices, and obtained fake and forged identification documents, including a modified United States passport, a California identification card, and a United States social security card.

Overview of Russian Intelligence Services (RIS) and the Use of Criminal Proxies

11. Based on my training, experience, and research, Russian intelligence services

("RIS"), acting as an arm of the Russian government, conduct a full spectrum of clandestine operations, including intelligence collection, disinformation, and assassinations using human, signals, electronic, and cyber methods, as well as proxies, organized crime groups, and other disposable agents.[1] Russia is "surreptitiously turning to criminal enterprises to influence populations and undermine the legitimacy of other states, seeking strategic (and at times economic) advantages while maintaining a façade of plausible deniability and keeping the interference below the threshold of conventional war."[2] This strategy has helped Russia, in the parlance of the U.S. military, to "prepare the battlefield" for Ukraine."[3]

12. The Russian government has historically utilized proxies and leveraged criminal groups for its operations.[4] The FSB,[5] specifically, employs a mix of Russian state-sponsored hackers and criminals who are tasked and allowed to operate for profit while also working for the state.[6]

13. For example, in 2022, a Mexican citizen acted under the direction and control of someone he believed to be a Russian government official, traveling to Miami in February 2020 to obtain the license plate number and parking location of a U.S. person's car to provide to a Russian government official.[7] The subject's communication with the Russian government official and his actions were consistent with the tactics of the RIS for spotting, assessing, recruiting and handling intelligence assets and sources.

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[1] *See* Russia's Foreign Intelligence Services (2026), https://www.congress.gov/crs-product/IF12865.
[2] *See* Sean M Wiswesser, *Tradecraft, Tactics, and Dirty Tricks - Russian Intelligence and Putin's Secret War,* 169, (1st ed. 2026).
[3] *Id.*
[4] *See, e.g.*, Magda Long, *Shadows of power beneath the threshold: where covert action, organized crime and irregular warfare converge, Intelligence and National Security* (2025), 40:1, 87-113, DOI: 10.1080/02684527.2024.2417454.
[5] The FSB is Russia's principal security agency and the successor agency to the Soviet Union's Committee for State Security, otherwise known as the KGB. The FSB is believed to engage in, among other things, intelligence gathering and covert operations outside of Russia.
[6] Wiswesser, supra note 2, at 172.
[7] U.S. Dep't of Justice, *Man Who Acted as Russian Agent Sentenced to Federal Prison Term*, https://www.justice.gov/archives/opa/pr/man-who-acted-russian-agent-sentenced-federal-prison-term (last visited October 23, 2026).

14. Another example in 2024 involved Poland's International Security Agency (ABW) foiling "Operation Lucky Strike," a plot to ignite a catastrophic fire in Wroclaw that could have endangered a nearby fuel depot holding 56 million liters of fuel.[8] The suspect, a Ukrainian citizen, was apprehended while attempting to flee the country. Evidence on his phone, including a Russian pyrotechnics manual and detailed instructions for pro-Russian activities, provided a direct link between his illegal activity and the RIS. Through their investigation, ABW also uncovered a network of Telegram groups used to recruit saboteurs and coordinate operations. Polish authorities have linked these plots to a broader campaign orchestrated by Russia's FSB.

15. Based on a review of the evidence described in this affidavit, including D'IU's targeting and stalking of Company employees, the references to D'IU's actions being for "the Motherland" and the Company's links to the war between Russia and Ukraine, and D'IU's belief that his taskings were from the Russian government, as well as my training, experience, and research on RIS operations and employment of criminal proxies, D'IU's activities described herein targeting the Company are consistent with direction by the RIS.

D'IU's Unlawful Entry into the United States to Pursue the Company's Employees

16. According to travel database records obtained on September 10, 2026, D'IU's last recorded travel was from Istanbul to Mexico City on June 7, 2026. There is no official record of D'IU's entry into the United States, and records of the State Department's Bureau of Consular Affairs do not show any active or approved visas for D'IU.

17. FBI agents conducted social media checks and identified a Facebook profile belonging to D'IU. D'IU used the profile on or around June 30, 2026, to post on a Facebook group page in Russian asking for transportation assistance to "get closer to New York[,]" adding

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[8] Michal Kukawski, *Poland as a Frontline Target in Russia's Growing Sabotage Campaign*, Veridica (Nov. 23, 2024, 12:47 PM), https://www.veridica.ro/en/opinions/poland-as-a-frontline-target-in-russias-growing-sabotage-campaign.

"I'll pay as much as needed." D'IU also replied to a response asking to be contacted by WhatsApp at a Mexico-based +528 phone number. According to Facebook records obtained via legal process, the Facebook account identified above was registered with the name "Igor Diu" on June 30, 2026, and verified by the Mexico-based phone number.

18. According to Google records obtained via legal process, D'IU has a Google account that was created on April 25, 2026, under the following name with Cyrillic characters:[9] "Игорь Дью."[10] D'IU used Google to search for the Company's Wikipedia page on July 28, 2026.

19. On or around August 3, 2026, D'IU used Google AI to search checkpoints from McAllen, Texas to various destinations. These queries also asked whether it was possible to travel from McAllen to San Antonio bypassing checkpoints and whether it was possible to get around them on foot. Based on my training and experience, D'IU's research on crossing the border and evading checkpoints is also consistent with unlawfully entering the United States. Researching checkpoints and security around McAllen, Texas likely enabled D'IU to avoid interactions with officials and enter the country without official examination or inspection.

20. On August 21, 2026, D'IU searched via Google AI, how to "rent a car in Palo Alto for foreigners," and on August 22, 2026, "How to get from Palo Alto by train to Los Angeles."

21. Because D'IU travelled into the United States from Mexico and between California and Nevada (noted below), D'IU travelled in foreign and interstate commerce.

D'IU Stalks Company Employees Home from Work

22. D'IU conducted Google Maps searches from approximately August 22, 2026, to September 23, 2026, involving several addresses belonging to Company employees. These

[9] The Cyrillic script is a writing system used for various languages across Eurasia. It is the designated national script in various Slavic, Turkic, Mongolic, Uralic, Caucasian and Iranic-speaking countries in Southeastern Europe, Eastern Europe, the Caucasus, Central Asia, North Asia, and East Asia.

[10] English translation: Igor D'iu

searches included the personal residence of a senior executive of the Company.

23. In September 2026, FBI agents spoke with an employee of the Company ("Company Employee 1") regarding suspicious activities involving its employees. According to Company Employee 1, on or about September 3, 2026, a female employee ("FEMP1") of the Company observed a white male driver (identified as D'IU in this affidavit) in a silver Lexus following her from the Company's office in Palo Alto on her way home to San Francisco. FEMP1 made evasive and irregular turns, took back roads, and turned into a grocery store parking lot where D'IU continued aggressively following her vehicle. D'IU followed FEMP1 through U-turns, illegal left turns, and ran a red light to stay with FEMP1 for nearly thirty miles. FEMP1 called 911 while driving and was instructed to drive directly to San Francisco Police Department ("SFPD") Mission Station. Near SFPD Mission Station, FEMP1 flagged an SFPD patrol vehicle and reported the incident. D'IU left once FEMP1 made contact with the patrol vehicle.

24. An SFPD report of the incident noted FEMP1 was in a state of emotional distress when she approached the SFPD patrol vehicle near SFPD Mission Station. [11] FEMP1 gave SFPD a description of D'IU's car and a partial read of his California license plate.

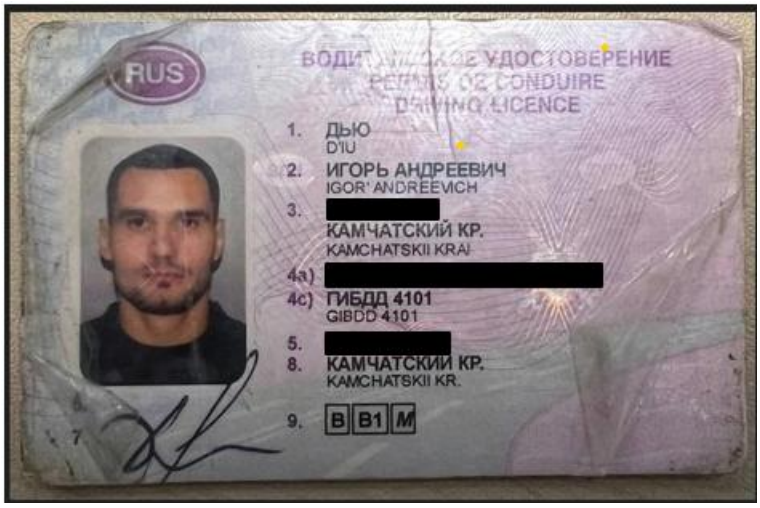
25. Security footage from the Company's Palo Alto office showed D'IU's Lexus in the immediate vicinity of the Company's office and following FEMP1 upon her departure. Footage showed the vehicle was a silver 2026 Lexus RX 350 bearing a California license plate matching FEMP1's description. Footage further showed the same Lexus at the Company's Palo Alto office on September 1, 2026, and September 2, 2026, potentially following two other employees. Company Employee 1 told agents that another female Company employee ("FEMP2") reported at 15:33 on September 2, 2026, that she had been followed briefly by the same vehicle upon departure from the Company's Palo Alto office.

[11] FBI agents reviewed the SFPD report on September 10, 2026, which corroborated Company Employee 1's account of FEMP1 being followed on September 3, 2026.

26. On or about September 11, 2026, FBI agents interviewed FEMP1, who corroborated previous accounts that D'IU followed her from the Company's Palo Alto office as she drove to San Francisco on September 3, 2026. FEMP1 told agents she was intimidated by the incident and had never seen D'IU before she noticed him following her.

D'IU Identified as the Driver Following Company Employees

27. The Company reported the incident involving FEMP1 to the Palo Alto Police Department ("PAPD"), providing surveillance photos of the Lexus and D'IU. The PAPD Information Report of the incident, noted PAPD ran database searches on the vehicle, showing the Lexus registered to an individual located at a Los Angeles address. PAPD contacted the vehicle's owner, who told PAPD that he owned the Lexus, lives in Southern California, and had rented out the Lexus. PAPD obtained a photo of a Russian driver's license for IGOR D'IU (pictured below) and an associated 571 area code phone number:



28. PAPD called the 571 area code phone number and spoke to D'IU via a Russian interpreter. D'IU told officers he was driving the Lexus in Palo Alto on September 3, 2026. When asked about whether he was driving near the Company, D'IU stated he did not know what businesses were nearby. He said he saw a woman get into a car and thought she was beautiful. D'IU told officers he followed the woman because he wanted to ask her out on a date. D'IU said he was in the United States on a tourist visa and staying at an Airbnb in Sunnyvale, checking out in three days. D'IU said he planned to stay in the U.S. for about two months and wanted to

travel to several big cities during his visit. D'IU denied following anyone on September 2, 2026, contradicting information previously provided by the Company.

29. On or around September 10, 2026, FBI agents requested and received California Law Enforcement Telecommunications System ("CLETS") and Department of Motor Vehicles ("DMV") records for the California license plate affiliated with the Lexus D'IU drove, which confirmed the owner of the Lexus driven by D'IU to follow Company employees.

30. FBI agents located the Lexus in East Palo Alto, California, approximately three miles from the Company. FBI agents initiated surveillance on the Lexus on or about September 10, 2026. The Lexus did not move from the location in East Palo Alto once surveillance commenced except for two short periods—once each on September 10, 2026, and September 16, 2026—when an unidentified woman moved it for street cleaning. Agents did not observe D'IU near the Lexus during this surveillance.

D'IU Obtains Fake Identification Documents

31. On or around September 14, 2026, U.S. Customs and Border Protection identified an international shipment report associated with the 571 number used by D'IU shipped from Kyrgyzstan to "Hugo Landry Johns" at an invalid address in Palo Alto (the "First DHL Package"). Database searches on "Hugo Landry Johns" yielded no results of persons with such name.

32. On or around September 16, 2026, FBI agents interviewed a DHL security employee regarding the First DHL Package. Before September 14, 2026, DHL unsuccessfully attempted to contact the addressee of the First DHL Package to request updated delivery instructions since the original address was invalid and DHL was unable to deliver the package to an invalid address. On or about September 14, 2026, a caller using the 775 number – a number associated with D'IU's Google Account – and identifying himself as Johns called DHL to update the delivery address for the First DHL Package to a Reno, Nevada location. Thereafter, the 775 number contacted DHL daily in a manner described by a DHL employee as "harassment."

33. On or about September 16, 2026, FBI agents also conducted social media checks on the 775 number. Results showed the number registered to a Telegram account under the name "Igor Dew." The account has photos of a white male resembling D'IU and recent posts of certain U.S. landmarks, including Steven Spielberg's star on the Hollywood Walk of Fame and the Golden Gate Bridge (dated August 29, 2026); and at the time the most recent post to the account was tagged in Reno, Nevada at the intersection of Gold Mine Drive and Precious Metal Drive. These posts corroborate D'IU's suspected travel from Los Angeles, where he picked up the Lexus, to the San Francisco Bay Area, where he followed FEMP1 and FEMP2 from the Company's office in Palo Alto, and finally to Reno, where D'IU requested the First DHL Package to be re-routed.

34. On or about September 21, 2026, pursuant to a warrant signed by the Honorable Lisa J. Cisneros, FBI agents intercepted and opened the First DHL Package. Inside, agents found an Uzbek identification document for an unknown individual. Agents retained the document to perform additional investigatory techniques on the document. Photographs of the contents are shown below:





35. On or about September 25, 2026, FBI agents conducted additional investigatory techniques on the Uzbek identification document in the First DHL Package. Inside, agents found the Uzbek identification document contained a falsified California State Identification Card bearing D'IU's likeness and the name "JOHNS HUGO LANDRY" and an address in Palo Alto, CA – similar to the address on the First DHL Package. The address listed on the fake

identification is about three miles from the East Palo Alto address where the Lexus was parked and less than one mile from the Company's office. Photographs of the hidden, falsified ID are shown below:



D'IU's Return to the San Francisco Bay Area

36. In the evening of September 22, 2026, FBI agents followed D'IU after he entered a vehicle with rideshare decals and rode from Reno, Nevada to the San Francisco Bay Area. Based on my training and experience, persons engaged in criminal activity sometimes will "lay low" or avoid areas where they know they were spotted or contacted by law enforcement before returning to resume their activities after a cooling period, consistent with D'IU's travel from the Bay Area to Reno and back again after a few days.

37. On or about September 23, 2026, agents observed an individual provide D'IU with a White 2016 Dodge Challenger. D'IU exchanged the Lexus for the Challenger, paying cash for the new vehicle and completing the exchange in East Palo Alto, California at the same address where the Lexus was parked.

38. Based on my training and experience, persons engaged in criminal activity will often change cars if they become suspicious or aware that their existing car has become known to law enforcement.

39. D'IU was also observed at a T-Mobile store in Palo Alto purchasing a new SIM card with cash.

D'IU Obtains a Fake Passport and Social Security Card

40. On or around September 28, 2026, U.S. Customs and Border Protection informed agents that D'IU was to receive another DHL package from Kyrgyzstan (the "Second DHL Package"). The Second DHL Package was addressed to "Hugo Landry Johns" at an improper spelling of the East Palo Alto address. This is the address the First DHL Package was later rerouted to, as discussed above. The same shipping address as the shipper on First DHL Package was listed. D'IU's second known telephone number with the 775 area code was listed as the contact number for "Hugo Landry Johns" (the same consignee contact information provided for First DHL Package).

41. On or about September 28, 2026, DHL informed agents that the Second DHL Package was located at DHL's facilities in Cincinnati/Northern Kentucky International Airport.

42. On or about September 30, 2026, pursuant to a warrant issued by the Honorable Candace J. Smith, FBI agents intercepted and opened the Second DHL Package. Inside, agents found a Republic of Uzbekistan "Diploma of Professional College" for an unknown individual. Photographs of the contents are shown below:





43. Agents performed additional investigatory techniques on the "Diploma," which was found to conceal a United States passport bearing D'IU's likeness and adopted pseudonym

and a social security card. Photographs of the passport and social security card are shown below:







44. On October 1, 2026, FBI agents ran database checks on the passport and social security card. The passport number was reported stolen and traced to a female living in New York. Stamps in the passport accurately reflected the New York female's past travel, indicating the passport was authentic but modified with D'IU's photo and "Johns Hugo Landry" identity.

Initial database checks of the social security number did not associate the social security number to any individual with the name "Hugo Landry Johns."

45. D'IU's procurement of fake or forged identity documents, a new residence, and a new phone number, indicate his intent to remain in the country. These activities also primed D'IU to re-engage in criminal activity involving Company employees under new information not previously known to PAPD, the Company, and its employees.

D'IU's Location Data Corroborates His Stalking of Company Employees

46. On or about September 25, 2026, pursuant to a warrant issued by the Honorable Lisa J. Cisneros, FBI agents received and analyzed data associated with D'IU's cell phone signals. D'IU's first cell phone signals transmitted in the United States on July 31, 2026, around McAllen, Texas.

47. D'IU's device later transmitted for extensive periods at or around the Palo Alto address near the Company from August 19, 2026, until September 4, 2026 – the same day PAPD called and interviewed D'IU. D'IU's device only began transmitting consistent signals near the East Palo Alto address on the evening of September 4, 2026, at which point the signals near the Palo Alto address ceased, suggesting D'IU moved houses immediately after the PAPD interview before going to Reno, Nevada for nearly two weeks.

Apple Account Associated with D'IU Confirms Russian Identity

48. According to Apple Inc. records obtained via legal process, D'IU has an Apple account associated with the 571 phone number, the phone number at which PAPD contacted D'IU, created on January 24, 2026, with the registered name "IGOR DIU" in Cyrillic characters. The Apple Account is a United States account, but the language for the account is Russian.

49. Pursuant to a search warrant issued by the Honorable Alex G. Tse, agents executed a search warrant on D'IU's Apple iCloud account. D'IU's iCloud account contained photos of the two Russian passport documents matching D'IU's name and likeness. The photographs are shown below:



Agents Search D'IU's Residence and Telegram Accounts

50. On October 8, 2026, pursuant to a search warrant issued by the Honorable Alex G. Tse, agents executed a search warrant for D'IU's person, residence, and devices. During the execution of the search warrants on D'IU's person and residence in East Palo Alto, agents recovered the California State ID and remnants from the First DHL Package; the U.S. passport and social security card and remnants from the Second DHL Package; the two Russian passports photographed above; $18,035 in cash; two laptops; two Apple iPhones; two T-Mobile SIM cards; and Wi-Fi equipment.

51. The following is a non-exhaustive list of evidence seized during the search of D'IU's residence, including his devices and Telegram application ("Telegram") accounts:

a. A notebook with 10 hand-written Palo Alto area addresses, at least five of which correlate to the Company employees' home addresses. D'IU later stated the addresses were provided to him by his contacts via Telegram ("Telegram Contacts").

b. Target package profiles of at least three Company employees, including employee names, personally identifiable information, educational and employment histories, relative names, narrative histories, and overall assessments of leadership

qualities, strengths and weaknesses. D'IU later stated that these target packages were provided to him by his Telegram contacts.

c. Telegram messages between D'IU and Telegram contact "Ian Morales" wherein Morales sent D'IU photos of at least four persons and their associated addresses, tasking D'IU to dress like a food delivery person, knock on the door of the addresses provided, and verify if the person resides at the address. FBI agents verified all four addresses provided by Morales to D'IU belonged to Company employees.

52. D'IU was later observed making the following statements, among others, relevant to acting in the United States on behalf of Russian government authorities:

a. D'IU came to the United States primarily because he was hired to enter the United States and fulfill assignments.

b. He was recruited on Telegram to work in the United States. D'IU was added to a Telegram group chat that included three other accounts. The handles of the group chat participants changed several times since the creation of the group, and the participants in the chat did not specifically identify themselves.

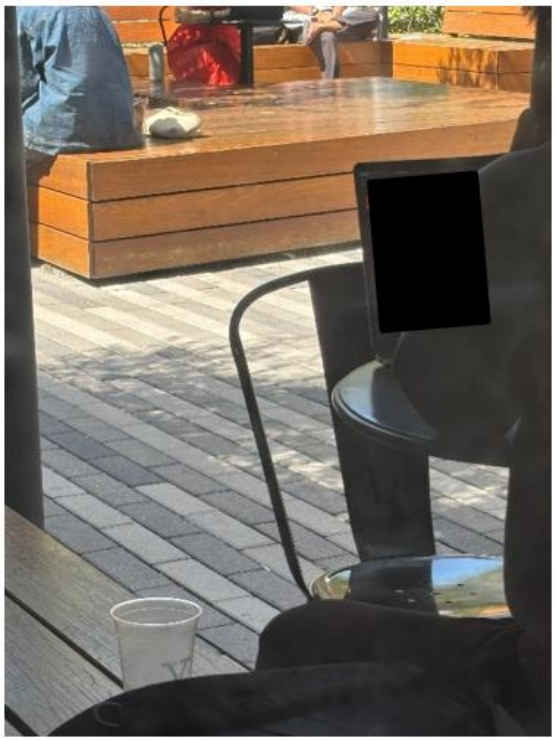
c. Through Telegram messages from Telegram Contacts, D'IU was instructed to travel to the United States. One Telegram Contact provided D'IU with a ticket to fly from Istanbul to Mexico. D'IU was told he would be given specific instructions once he entered the United States, but his general job would be to gather information. D'IU's Telegram account included the following photo of his airline ticket stub from his flight to Mexico City:



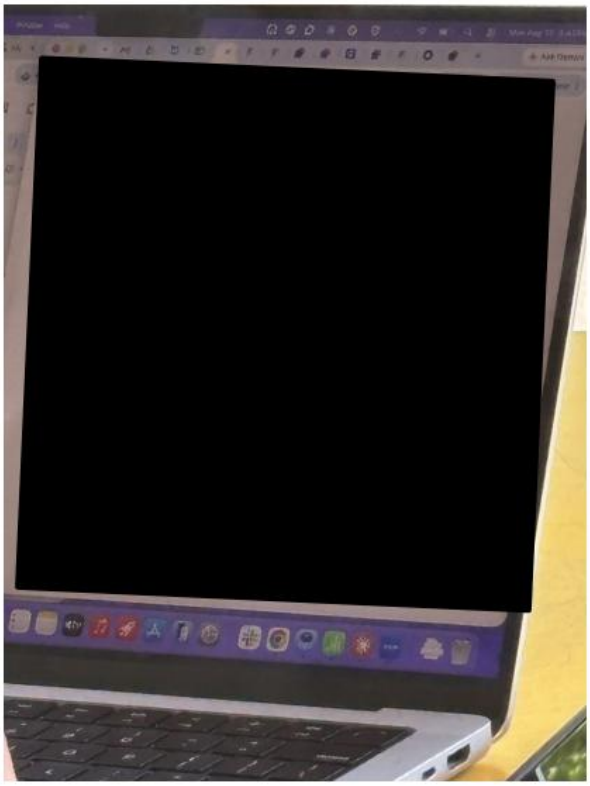
d. In Mexico, his Telegram Contacts connected him with an "Uzbek" contact who helped him cross the U.S. – Mexico border.

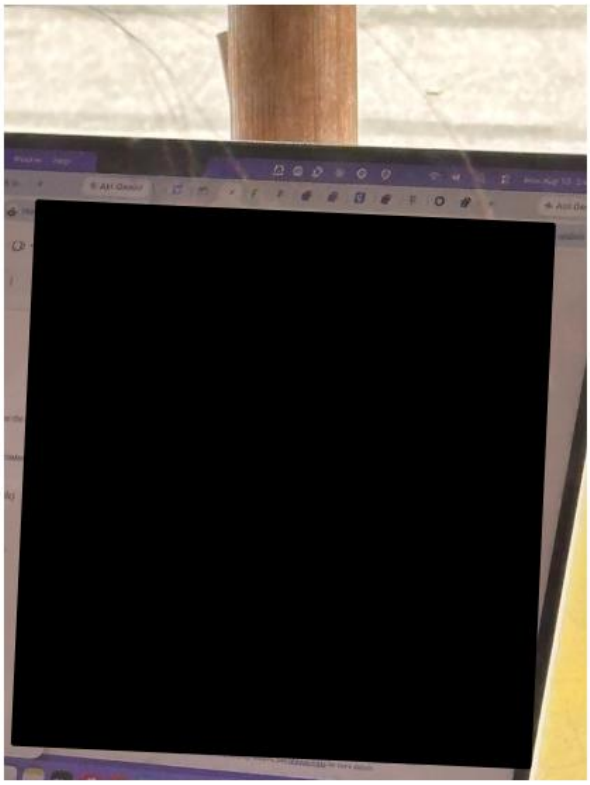
e. After arriving in the United States, his Telegram Contacts instructed him to purchase a laptop, Wi-Fi device, a puck device, an extra phone, and download a remote access software. D'IU still had those items in his possession at the time of the search.

f. After purchasing hardware and software on or around August 12, 2026, D'IU was instructed to visit a coffee shop near the Company's office, identify Company employees, and take pictures of their laptop screens while they worked. D'IU provided any photos he took in the coffee shop to his Telegram Contacts. Photographs from D'IU's Telegram account showing various laptop screens are shown below:









g. On or about August 15, 2026, D'IU was instructed again to go to a coffee shop with his laptop so the Telegram Contacts could control his laptop via the remote access software to collect data from any Company employees in range.

h. D'IU's assignments gradually increased over time. Initially, D'IU would be told to go to a specific location for a few minutes. Eventually, he would stay in one spot for up to three hours at a time. For example, D'IU stated that on October 6, 2026, D'IU was tasked to take the laptop to an apartment complex about half a mile away from the Company's office for approximately one hour while the Telegram Contacts logged in remotely. Another time, D'IU was told to leave the laptop at the location in the middle of the night and retrieve the laptop after about three hours. D'IU gradually began to understand he was doing something bad and that his actions were illegal.

i. D'IU asked his Telegram Contacts who he (*i.e.*, D'IU) was working for, who told him he was working for "the Motherland." D'IU's Telegram Contacts told him

he was directed to collect information on the Company because the Company was providing weapons to fight against Russia in Ukraine. D'IU suspected his Telegram Contacts were from the Russian government.

j. Various hand-written addresses in his notebook were locations given to him by his Telegram Contacts in addition to the windows of time that D'IU was instructed to be at those locations.

k. After PAPD called to ask why he was following people, D'IU changed vehicles. Following this interaction, D'IU eventually noticed he was being followed and figured that he must have been tracked by his phone. This prompted D'IU to get a new phone. When D'IU reported the call to his Telegram Contacts, they instructed him to leave the state. D'IU initially intended to go to Oregon but decided to go to Reno, Nevada because it was closer. D'IU stated his Telegram Contacts could find no assignments for him in Reno so they eventually told him to return to the San Francisco Bay Area.

l. D'IU's Telegram Contacts arranged for D'IU to receive fake U.S. documents, including a California ID card, U.S. passport, and a social security card. D'IU was able to pick his alias name, "Hugo Landry Johns" as a variant of the name of D'IU's favorite actor, Caleb Landry Jones.

m. D'IU stated that he was paid $15,000 in cash three times since his arrival in the United States. To receive money, D'IU was instructed by a Telegram Contact to take a picture of the serial number of a dollar bill in his possession and send the photo to the Telegram Contact, along with a description of what he was wearing. The serial number and clothing description would be passed to a courier who would meet D'IU and pay him in cash. D'IU would provide the dollar to the courier, and the courier would compare the serial number to the photo of the serial number he presumably received from the Telegram Contact. If the serial numbers matched, the courier would give D'IU the money. D'IU said he was paid three times between August 12 and October 6, 2026.

53. Based on my training, experience, and research, D'IU's communications with his Telegram Contacts is consistent with the tactics of the RIS and its criminal proxies for spotting, assessing, recruiting and handling intelligence assets and sources. D'IU's targeting of the Company and its employees is also consistent with RIS objectives in Russia's war against Ukraine.

54. Based on a search of the Department of Justice Foreign Agents Registration Act ("FARA") database on or about October 16, 2026, D'IU has not registered as an agent of the Russian Federation or any other foreign government, nor has D'IU notified the Attorney General under 18 U.S.C. § 951, pursuant to 28 C.F.R. § 73.3(a). The search is historical in nature and includes active and terminated registrations stored in the database. Based on this database search, I believe that D'IU is currently not, nor ever was, a registered foreign agent.

CONCLUSION

55. Based on the information above, there is probable cause to believe that IGOR D'IU has violated 18 U.S.C. § 371 – Conspiracy to Act as an Agent of a Foreign Government; 18 U.S.C. § 951 – Acting as an Agent of a Foreign Government, and 18 U.S.C. § 2261A(1)(B) – Interstate Stalking, in the Northern District of California. Accordingly, I respectfully request that the Court issue a criminal complaint and warrant for his arrest.

I declare under penalty of perjury
that the above is true and correct to
the best of my knowledge and belief.

/s/

Winston Wong
Special Agent
Federal Bureau of Investigation

Sworn to before me, via telephone, and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d) on this 29th day of October 2026.

HONORABLE ALEX G. TSE
United States Magistrate Judge