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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

UNITED STATES OF AMERICA

* CRIMINAL NO. HM 85-0621

v.

RONALD WILLIAM PELTON

* (Conspiracy to Deliver
National Defense Information
to a Foreign Government, 18
U.S.C. § 794(c); Delivery of
National Defense Information
to a Foreign Government, 18
U.S.C. § 794(a); Transmission
of Information Concerning the
Communication Intelligence
Activities of the United
States to an Unauthorized
Person, 18 U.S.C. § 798(a);
Aiding and Abetting, 18 U.S.C.
§ 2)

INDICTMENT

The Grand Jury for the District of Maryland charges

that:

A. INTRODUCTION

1. RONALD WILLIAM PELTON was employed by the National Security Agency (NSA) from November 1965 through July 1979.

2. Throughout his employment at NSA, RONALD WILLIAM PELTON possessed a Top Secret security clearance with additional clearances for compartmented information relating to signals intelligence. In the course of that employment, he obtained a wide range of information relating to the national defense of the United States of America.

3. At times relevant to this Indictment, Anatoly Slavov was an agent, officer and employee of the government of the Union of Soviet Socialist Republics.

(1)

B. THE CONSPIRACY

4. Beginning on or about January 14, 1980, and continuing thereafter until on or about November 24, 1985, in the State and District of Maryland, the District of Columbia, the Commonwealth of Virginia, Vienna, Austria, and elsewhere,

RONALD WILLIAM PELTON

did knowingly and wilfully combine, conspire, confederate and agree with Anatoly Slavnov and with other persons known and unknown to the Grand Jury, to knowingly and wilfully communicate, deliver, and transmit to a foreign government, that is, the Union of Soviet Socialist Republics and to representatives, officers, agents, employees, subjects and citizens thereof, directly and indirectly, information relating to the national defense of the United States of America, with intent and reason to believe that the same would be used to the injury of the United States of America and to the advantage of a foreign nation, that is, the Union of Soviet Socialist Republics, in violation of Title 18, United States Code, § 794(a).

5. It was a part of the conspiracy that RONALD WILLIAM PELTON would communicate with agents of the Union of Soviet Socialist Republics, through various clandestine means, for purposes of arranging meetings and for receiving payments intended to cover the expenses of international travel.

6. It was further a part of the conspiracy that on various occasions RONALD WILLIAM PELTON would deliver and attempt to deliver information relating to the national defense to a representative, officer, agent, employee, subject and citizen of

the Union of Soviet Socialist Republics.

7. It was further a part of the conspiracy that RONALD WILLIAM PELTON received cash payments in compensation for his role in the conspiracy.

C. OVERT ACTS

8. To effect the objects of the conspiracy, RONALD WILLIAM PELTON and co-conspirators committed various overt acts within the State and District of Maryland, and elsewhere, including but not limited to the following:

(a) On or about January 15, 1980, RONALD WILLIAM PELTON travelled from Maryland to the District of Columbia for the purposes of transmitting information relating to the national defense of the United States of America to representatives of the Union of Soviet Socialist Republics.

(b) On or about January 15, 1980, at the Embassy of the Union of Soviet Socialist Republics in Washington, D.C., RONALD WILLIAM PELTON did transmit and attempt to transmit information relating to the national defense of the United States to officers and agents of the Union of Soviet Socialist Republics.

(c) In or about 1980, the exact date being unknown to the Grand Jury, RONALD WILLIAM PELTON travelled from Maryland to Vienna, Austria.

(d) In or about 1980, the exact date being unknown to the Grand Jury, in Vienna, Austria, RONALD WILLIAM PELTON received approximately \$20,000 cash from an agent of the Union of Soviet Socialist Republics.

(e) In or about 1980, in Vienna, Austria, RONALD WILLIAM PELTON did transmit and attempt to transmit information relating to the national defense of the United States to an agent of the Union of Soviet Socialist Republics.

(f) In or about January 1983, RONALD WILLIAM PELTON travelled from Maryland to Vienna, Austria.

(g) In or about January 1983, in Vienna, Austria, RONALD WILLIAM PELTON received approximately \$15,000 cash from an agent of the Union of Soviet Socialist Republics.

(h) In or about January 1983, in Vienna, Austria, RONALD WILLIAM PELTON did transmit and attempt to transmit information relating to the national defense of the United States to an agent of the Union of Soviet Socialist Republics.

(i) In or about April 1985, RONALD WILLIAM PELTON travelled to Vienna, Austria, for the purposes of meeting with an agent of the Union of Soviet Socialist Republics.

(j) In or about the summer of 1985, in the State and District of Maryland, RONALD WILLIAM PELTON did travel by automobile toward a designated location in Virginia for the purpose of communicating with an agent of the Union of Soviet Socialist Republics.

COUNT TWO

And the Grand Jury for the District of Maryland further charges that:

On or about January 14 and 15, 1980, in the State and District of Maryland, and the District of Columbia,

RONALD WILLIAM PELTON

did knowingly and wilfully communicate, deliver, and transmit and attempt to communicate, deliver and transmit to a foreign government, that is, the Union of Soviet Socialist Republics, and to a representative, officer, agent, employee, subject, and citizen thereof, information relating to the national defense of the United States of America, with intent and reason to believe that said information was to be used to the injury of the United States and to the advantage of a foreign nation, that is, the Union of Soviet Socialist Republics.

18 U.S.C. Section 794(a)

18 U.S.C. Section 2

COUNT THREE

And the Grand Jury for the District of Maryland further charges that:

In or about 1980, the precise date and time being unknown to the Grand Jury, in the State and District of Maryland, Vienna, Austria, and elsewhere,

RONALD WILLIAM PELTON

did knowingly and wilfully communicate, deliver, and transmit and attempt to communicate, deliver and transmit to a foreign government, that is, the Union of Soviet Socialist Republics, and to a representative, officer, agent, employee, subject, and citizen thereof, information relating to the national defense of the United States of America, with intent and reason to believe that said information was to be used to the injury of the United States and to the advantage of a foreign nation, that is, the Union of Soviet Socialist Republics.

18 U.S.C. Section 794(a)

18 U.S.C. Section 2

COUNT FOUR

And the Grand Jury for the District of Maryland further charges that:

In or about January 1983, in the State and District of Maryland, Vienna, Austria, and elsewhere,

RONALD WILLIAM PELTON

did knowingly and wilfully communicate, deliver, and transmit and attempt to communicate, deliver and transmit to a foreign government, that is, the Union of Soviet Socialist Republics, and to a representative, officer, agent, employee, subject, and citizen thereof, information relating to the national defense of the United States of America, with intent and reason to believe that said information was to be used to the injury of the United States and to the advantage of a foreign nation, that is, the Union of Soviet Socialist Republics.

18 U.S.C. Section 749(a)

18 U.S.C. Section 2

COUNT FIVE

And the Grand Jury for the District of Maryland further charges that:

In or about April 1985, in the State and District of Maryland, Vienna, Austria, and elsewhere,

RONALD WILLIAM PELTON

did knowingly and wilfully attempt to communicate, deliver, and transmit to a foreign government, that is, the Union of Soviet Socialist Republics, and to a representative, officer, agent, employee, subject, and citizen thereof, information relating to the national defense of the United States of America, with intent and reason to believe that said information was to be used to the injury of the United States and to the advantage of a foreign nation, that is, the Union of Soviet Socialist Republics.

18 U.S.C. Section 794(a)

18 U.S.C. Section 2

COUNT SIX

And the Grand Jury for the District of Maryland further charges that:

In or about January 1983, in the State and District of Maryland, Vienna, Austria, and elsewhere,

RONALD WILLIAM PELTON

did knowingly and wilfully communicate, furnish, transmit and make available to an unauthorized person classified information concerning the communication intelligence activities of the United States.

18 U.S.C. Section 798(a)

18 U.S.C. Section 2

Catherine C. Blake
Catherine C. Blake
United States Attorney

A TRUE BILL:

Romney S. L. Stalein
Foreperson

AFFIDAVIT IN SUPPORT OF COMPLAINT

The undersigned Affiant, being duly sworn, states that he has been a Special Agent of the Federal Bureau of Investigation (F.B.I.) for twenty-one years. For the last six months, he has been assigned to the Foreign Counter-intelligence Squad. The information contained herein has been gained from personal observation by the Affiant and by conversation and communication with other Special Agents of the F.B.I. and representatives of the National Security Agency (NSA).

The Affiant hereby states that the following is true and correct, either to his personal knowledge or upon information communicated to him. The sources of the Affiant's information and the grounds for his belief are as follows:

1. The employment records of the NSA which I have personally reviewed reflect that Ronald William Pelton was employed at NSA at Fort Meade, Maryland, from November 1965 through July 1979. During his employment, Pelton possessed a Top Secret clearance with clearances for special compartmented information relating to signals intelligence. Records of NSA reflect that in 1978, Pelton authored a classified document concerning technical information about the Soviet Union of interest to NSA.

2. A confidential source who is in a position to have access to extremely sensitive information about Soviet intelligence activities directed against the United States provided information which led to the identification of Pelton. As a result of that information, your Affiant and another Special

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Agent of the F.B.I. interviewed Pelton on November 24, 1985. In the course of that interview, Pelton indicated that on several occasions from January 1980 through January 1983, Pelton met with Anatoly Slavnov, an intelligence officer of the KGB, and, in exchange for payments, provided to the Soviet agent extremely sensitive classified information relating to United States intelligence activities directed at the Soviet Union.

3. Pelton acknowledged that he had entered the Soviet Embassy in Washington, D. C. in January of 1980. On that occasion he agreed to provide sensitive information relating to United States intelligence activities in exchange for cash payments. On that occasion, he provided specific information relating to a United States intelligence collection project targeted at the Soviet Union.

4. NSA representatives have confirmed that Pelton had access to extremely sensitive information relating to that project. An NSA representative has confirmed that the specific information transmitted to the Soviets by Pelton was information relating to the national defense, the disclosure of which may be potentially damaging to the United States or potentially advantageous to a foreign power.

5. Pelton stated that he travelled to Vienna, Austria, in October 1980 for purposes of meeting with a Soviet agent. He further indicated that he made a second trip to Vienna, Austria in January 1983 for the same purpose. On each occasion he spent approximately three to four days in Vienna and was housed at the apartment of the Soviet Ambassador to Austria within the Soviet

embassy compound. On both occasions he spent approximately eight hours a day in debriefing sessions with Slavnov, providing written answers to written questions. Pelton stated that during those debriefing sessions with Slavnov, he was questioned about practically every area of sensitive information to which he had access through his employment at NSA. In the course of Affiant's interview with Pelton, Affiant showed Pelton the 1978 document referenced in paragraph one above. Pelton stated that the Soviet agent was interested in all of the programs outlined in that document.

6. NSA representatives have confirmed that the information contained in the document Pelton authored in 1978 is information relating to the national defense, the disclosure of which may potentially damage the United States or be potentially advantageous to a foreign nation.

7. Pelton further indicated that he had travelled to Vienna in April of 1985 for purposes of meeting with a Soviet agent. Pelton indicated he spent approximately three days in Vienna on that occasion, but was unable to meet with a Soviet representative on that occasion.

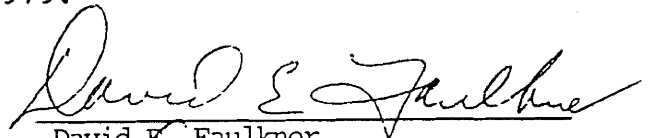
8. Pelton's passport, obtained from him on November 24, 1985, reflects entry into the United States in April of 1985. Pelton confirmed that that was the time at which he returned from his 1985 trip to Vienna, Austria. Another stamp in the passport does not bear a date, but shows entry into the United States at John F. Kennedy Airport, New York, New York. Pelton stated that that stamp reflected his reentry into the

United States following his 1983 trip to Vienna to meet with the Soviet agent.

9. In the course of the interview, Pelton acknowledged that he was aware that the information he delivered to the Soviets could be used to the injury of the United States. Pelton acknowledged that prior to his trip to Vienna in 1983 he had received a telephone call at his residence in Silver Spring, Maryland, to arrange for the trip. Pelton further acknowledged receiving a telephone call at his residence in Silver Spring, Maryland in July, 1985, relating to his failure to meet with the Soviet agent in April of 1985 in Vienna and requesting that he make another trip to Vienna in October 1985.

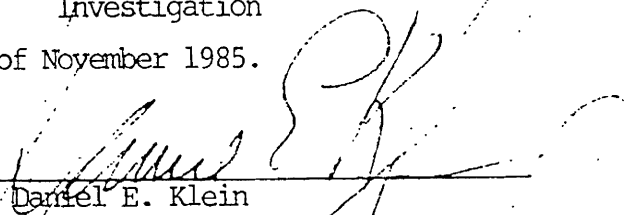
10. Pelton acknowledged receiving sums of cash from the Soviet agent on several occasions. Specifically, Pelton stated that he received \$15,000 as a result of his trip to Vienna, Austria in January 1983. He acknowledged opening a bank account in March 1983, and making two cash deposits of \$5,000 each into that account. Bank records confirm those transactions.

11. Financial records reflect that Pelton had serious financial troubles at or about the time he entered the Soviet Embassy in January 1980. Court records indicate that Pelton filed for bankruptcy in April of 1979.



David E. Faulkner
Special Agent - Federal Bureau of
Investigation

Sworn before me this 25th day of November 1985.



Daniel E. Klein
United States Magistrate