

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Criminal Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. MOHAMMED WALI ZAZI,

Defendant.

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**INDICTMENT**

18 U.S.C. § 1001(a)(2)

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**COUNT 1**

(False Statement)

The Grand Jury charges that:

On or about September 16, 2009, in the State and District of Colorado, in a matter within the jurisdiction of the executive branch of the Government of the United States, and in an offense involving international and domestic terrorism,

**MOHAMMED WALI ZAZI,**

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation to agents of the Federal Bureau of Investigation ("FBI"), that is, defendant ZAZI denied that he spoke with anyone by telephone regarding whether Najibullah Zazi was in any trouble, when, in fact, on or about

September 11, 2009, defendant ZAZI did speak by telephone with a person regarding whether Najibullah Zazi was in any trouble.

The foregoing count was in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

Ink signature on file in the Clerk's Office  
FOREPERSON

DAVID M. GAOUETTE  
United States Attorney

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By: s/ William M. Narus  
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Attorney for the Government

DATE: October 8, 2009

DEFENDANT 1: MOHAMMED WALI ZAZI

YOB: 1955

ADDRESS: Arapahoe County, CO

COMPLAINT FILED?  YES  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 09-mj-03000-CBS  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?  YES  NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: Count One: Title 18, United States Code, Section 1001(a)(2) - Making a False Statement in a Matter Involving International and Domestic Terrorism

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: Count One: NMT 8 years imprisonment, \$250,000 fine, or both; NMT 3 years supervised release; \$100.00 Special Assessment Fee

AGENTS: SA Garrett Gumbinner, FBI  
SA Micheal Copeland, FBI

AUTHORIZED BY: Tim Neff  
Assistant U.S. Attorney

Greg Holloway  
Assistant U.S. Attorney

David M. Gaouette  
United States Attorney

William M. Narus  
Trial Attorney, Counterterrorism Section, U.S. Department of Justice

ESTIMATED TIME OF TRIAL: 5 days or less

THE GOVERNMENT will not seek detention in this case

The statutory presumption of detention is not applicable to this defendant.

OCDETF CASE:     \_\_\_  Yes    ✓  No