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10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE EASTERN DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,) CASE NO.
15)
16 Plaintiff,) VIOLATION: 18 U.S.C. §
17 v.) 1001(a)(2)- False Statements
18) Involving International Terrorism
19)
20 AWS MOHAMMED YOUNIS AL-JAYAB,)
21)
22 Defendant.)
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I N D I C T M E N T

The Grand Jury charges: T H A T

AWS MOHAMMED YOUNIS AL-JAYAB,
defendant herein, on or about October 6, 2014, in the County of
Sacramento, State and Eastern District of California, in a matter
within the jurisdiction of the Executive Branch of the Government of
the United States, to wit: the United States Citizenship and
Immigration Services (USCIS), a component of the United States

1 Department of Homeland Security (DHS), did knowingly and willfully
2 make the following materially false, fraudulent, and fictitious
3 statements and representations:

4 1) When directed to list the countries he visited during the
5 last time he traveled outside the United States, in 2013 to 2014, AL-
6 JAYAB responded that he went to Turkey, and from Turkey he went to
7 Britain and returned to the United States. This response was false
8 because, as defendant AL-JAYAB then and there well knew, he traveled
9 to Syria, and his travel was not confined to Turkey and Britain
10 before returning to the United States;

11 2) When asked the purpose of his trip, AL-JAYAB responded that
12 he went to Turkey to see his grandmother and to visit the place.
13 This response was false because, as defendant AL-JAYAB then and there
14 well knew, he went to Turkey to get to Syria and for reasons other
15 than to visit his grandmother;

16 3) In response to the question "Have you ever been a member of
17 any rebel group, militia, or insurgent organization?" AL-JAYAB
18 responded "No." This response was false because, as defendant AL-
19 JAYAB then and there well knew, while he was in Syria between on or
20 about November 19, 2013 and on or about January 17, 2014, he was a
21 member of a rebel group, militia, and insurgent organization.

22 4) In response to the question "Have you ever assisted any
23 rebel group, militia, or insurgent organization?" AL-JAYAB responded
24 "No." This response was false because, as defendant AL-JAYAB then
25 and there well knew, while he was in Syria between on or about
26 November 19, 2013 and on or about January 17, 2014, he assisted a
27 rebel group, militia, and insurgent organization.

28 5) In response to the question "Have you ever solicited

1 membership or funds for any terrorist group or organization?" AL-
2 JAYAB responded "No." This response was false because, as defendant
3 AL-JAYAB then and there well knew, he had solicited in April 2013 a
4 person known to the grand jury and referred to herein as Person A to
5 become a member of a terrorist group or organization.

6 6) In response to the question "Have you ever provided any
7 type of material support to any person or group that engages in
8 terrorist activity?" AL-JAYAB responded, "No." This response was
9 false because, as defendant AL-JAYAB then and there well knew, while
10 he was in Syria between on or about November 19, 2013 and on or about
11 January 17, 2014, he provided material support to a person and group
12 engaged in terrorism.

13 7) In response to the question "Have you ever called for,
14 helped with, or committed the killing of any person?" AL-JAYAB
15 responded, "No." This response was false because, as defendant AL-
16 JAYAB then and there well knew, while he was in Syria between on or
17 about November 19, 2013 and on or about January 17, 2014, he called
18 for and helped with the killing of a person.

19 8) In response to the question "Have you ever called for,
20 helped with, or committed the intentional and severe injury of any
21 person?" AL-JAYAB responded, "No." This response was false because,
22 as defendant AL-JAYAB then and there well knew, while he was in Syria
23 between on or about November 19, 2013 and on or about January 17,
24 2014, he called for and helped with the intentional and severe injury
25 of a person.

26 9) In response to the question "Have you ever been a member of
27 a group of any kind in which you used or threatened to use any type
28 of weapon against any person?" AL-JAYAB responded, "No." This

1 response was false because, as defendant AL-JAYAB then and there well
2 knew, while he was in Syria between on or about November 19, 2013 and
3 on or about January 17, 2014, he was a member of a group in which he
4 used and threatened to use a weapon against a person.

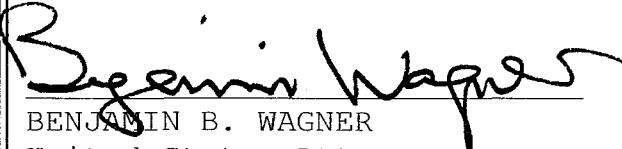
5 10) In response to the question "Have you ever assisted in a
6 group where other people used or threatened to use a weapon against
7 any person?" AL-JAYAB responded, "No." This response was false
8 because, as defendant AL-JAYAB then and there well knew, while he was
9 in Syria between on or about November 19, 2013 and on or about
10 January 17, 2014, he assisted a group where other people used and
11 threatened to use a weapon against a person.

12 This offense involved international terrorism.

13 In violation of Title 18, United States Code, Section
14 1001(a)(2).

15
16 A TRUE BILL.

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18 _____
19 FOREPERSON

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21 BENJAMIN B. WAGNER
22 United States Attorney
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