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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2013 Grand Jury

CR13-0736

UNITED STATES OF AMERICA,

CR No. 13-

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1542: Making a
False Statement on a Passport
Application; 18 U.S.C. § 2339B:
Attempting to Provide Material
Support to a Designated Foreign
Terrorist Organization]

SINH VINH NGO NGUYEN,
aka "Hasan Abu Omar
Ghannoum,"

Defendant.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1542]

On or about August 23, 2013, in Los Angeles County, within
the Central District of California, and elsewhere, defendant
SINH VINH NGO NGUYEN ("NGUYEN"), also known as ("aka") "Hasan
Abu Omar Ghannoum," willfully and knowingly made a false
statement in an application for a passport with intent to induce
and secure for his own use the issuance of a passport under the
authority of the United States, contrary to the laws regulating
the issuance of such passports and the rules prescribed pursuant

1 to such laws, in that in such application defendant NGUYEN made
2 false statements about his name, his date of birth, his place of
3 birth, his parents' names, his parents' places of birth, and
4 falsely answered "no" to whether he had ever applied for or been
5 issued a U.S. Passport Book.

6 Defendant NGUYEN committed this offense to facilitate an
7 act of international terrorism, as defined in Title 18, United
8 States Code, Section 2331, namely, an act that: (1) is violent
9 and dangerous to human life that is a violation of the criminal
10 laws of the United States or of any State if committed within
11 the jurisdiction of the United States or of any State; (2)
12 appears to be intended to intimidate or coerce a civilian
13 population, or influence the policy of a government by
14 intimidation or coercion, or affect the conduct of a government
15 by mass destruction, assassination, or kidnapping; and (3)
16 occurs primarily outside the territorial jurisdiction of the
17 United States.

COUNT TWO

[18 U.S.C. § 2339B]

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3 On or about October 11, 2013, in Orange County, within the
4 Central District of California, and elsewhere, defendant SINH
5 VINH NGO NGUYEN, also known as ("aka") "Hasan Abu Omar
6 Ghannoum," a national of the United States, knowingly attempted
7 to provide material support and resources, that is, services and
8 personnel, namely himself, to work under the direction and
9 control of al-Qaida, which had been designated by the Secretary
10 of State as a foreign terrorist organization since on or about
11 October 8, 1999, knowing that al-Qaida had been designated as a

12 //

13 //

14 //

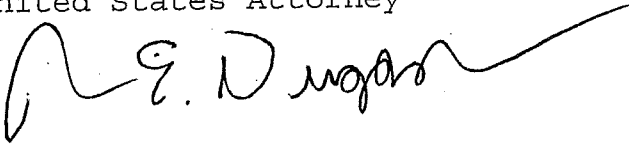
1 foreign terrorist organization, and knowing that al-Qaida had
2 engaged in, and was engaging in, terrorist activity and
3 terrorism.

4 A TRUE BILL

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6 151

7 Foreperson

8 ANDRÉ BIROTTE JR.
9 United States Attorney

10 

11 ROBERT E. DUGDALE
12 Assistant United States Attorney
13 Chief, Criminal Division

14 PATRICK R. FITZGERALD
15 Assistant United States Attorney
16 Chief, National Security Section

17 JUDITH A. HEINZ
18 Assistant United States Attorney
19 Deputy Chief, National Security Section

20 DEIRDRE Z. ELIOT
21 Assistant United States Attorney
22 National Security Section

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