

FILED

2015 MAY 15 PM 3:42

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
CLERK DEPUTY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
March 2015 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.
MOHAMAD SAEED KODAIMATI,
Defendant.

Case No. 15 CR 1298 AIB

I N D I C T M E N T

Title 18, U.S.C., Sec. 1001(a)(2) -
False Statements Involving
International Terrorism

The grand jury charges:

Count 1

On or about March 10, 2015, at the United States Embassy, in Ankara, Turkey, defendant MOHAMAD SAEED KODAIMATI, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the Federal Bureau of Investigation ("FBI") and the Department of State's Diplomatic Security Service ("DSS"), and having been arrested in the Southern District of California, did knowingly and willfully make a materially false, fraudulent, and fictitious statement and representation, in that defendant MOHAMAD SAEED KODAIMATI stated to a Special Agent of the FBI and a Special Agent of DSS that:

JNP:MFK:nlv:San Diego
5/8/15

1 (1) He had never worked for or volunteered at a Sharia Court;

2 (2) He had only been to a Sharia Court once;

3 (3) He did not know anyone who was a member of ISIS, a Foreign
4 Terrorist Organization also known as Islamic State in Iraq and the
5 Levant (ISIL);

6 (4) While in Syria, he had never been involved with Al Nusrah, a
7 Foreign Terrorist Organization, in any manner;

8 (5) While in Syria, he had never been involved in any fighting;

9 (6) While in Syria, he never fired a weapon at anyone;

10 (7) While in Syria, he had never been in combat; whereas, in
11 truth and fact, as defendant then and there well knew, these
12 statements and representations were false, fictitious and fraudulent
13 when made.

14 It is further alleged that this offense involved international
15 terrorism.

16 All in violation of Title 18, United States Code, Section 1001(a)(2).

17 Count 2

18 On or about March 11, 2015, at the United States Embassy, in
19 Ankara, Turkey, defendant MOHAMAD SAEED KODAIMATI, in a matter within
20 the jurisdiction of the executive branch of the Government of the
21 United States, to wit: the Federal Bureau of Investigation ("FBI") and
22 the Department of State's Diplomatic Security Service ("DSS"), and
23 having been arrested in the Southern District of California, did
24 knowingly and willfully make a materially false, fraudulent, and
25 fictitious statement and representation, in that defendant MOHAMAD
26 SAEED KODAIMATI stated to a Special Agent of the FBI and a Special
27 Agent of DSS that:

28 //

1 (1) He never communicated with an individual named A.S. about
2 Al-Nusrah, a Foreign Terrorist Organization, and ISIS, a Foreign
3 Terrorist Organization also known as Islamic State in Iraq and the
4 Levant (ISIL);


5 (2) He never told A.S. that he was affiliated with Al-Nusrah in
6 any manner; whereas, in truth and fact, as defendant then and there
7 well knew, these statements and representations were false, fictitious
8 and fraudulent when made.

9 It is further alleged that this offense involved international
10 terrorism.


11 All in violation of Title 18, United States Code, Section 1001(a)(2).

12 DATED: May 15, 2015.

13 A TRUE BILL:

14 
15 _____
Foreperson

16 LAURA E. DUFFY
17 United States Attorney

18 By: 
19 _____
MICHAEL F. KAPLAN
20 Assistant U.S. Attorney
21
22
23
24
25
26
27
28