## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA



## Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v. LUIS PORTORREAL,	)	No. 1:16-CR-210
	)	
	)	
	)	
Defendant.	)	

## CRIMINAL INFORMATION

Between on or about January 19, 2015, and on or about March 13, 2015, within the Eastern District of Virginia, in a matter within the jurisdiction of the executive branch of the United States Government, the defendant, LUIS PORTORREAL, did willfully and knowingly make and cause to be made a materially false, fictitious, and fraudulent statement and representation to a Special Agent of the Federal Bureau of Investigation in connection with a criminal investigation, to wit:

- a. On or about January 19, 2015, the defendant falsely stated that no one he knew of was sympathetic to the Islamic State in Iraq and the Levant (ISIL).
- On or about January 19, 2015, the defendant falsely stated that he did not know anyone fighting for ISIL.
- c. On or about January 19, 2015, the defendant falsely stated that he did not know where Reza Niknejad had gone.
- d. On or about January 19, 2015, the defendant falsely stated that the last time he saw Niknejad was at a mosque.
- e. On or about January 19, 2015, the defendant falsely omitted the fact that he had driven Niknejad to the airport on or about January 14, 2015.

- f. On or about January 19, 2015, the defendant falsely stated that he had no knowledge of the destination or purpose of Niknejad's travel.
- g. On or about January 19, 2015, the defendant falsely stated that Niknejad may have gone to a university in Saudi Arabia.
- h. On or about January 19, 2015, the defendant falsely stated that he and Ali Amin had delivered a letter from Niknejad to his family the same day he drove Niknejad to the airport.
- i. On or about January 19, 2015, the defendant falsely omitted the fact that he had driven Niknejad and Amin to the Post Office to retrieve a package containing a phone, an encrypted thumb drive, and a letter from the overseas ISIL supporter.
- On or about January 19, 2015, the defendant falsely stated that he had no online contact with Niknejad.
- k. On or about January 19, 2015, the defendant knowingly failed to provide the names of individuals with whom he had participated in chats along with Niknejad to discuss Niknejad's travel to Syria and support of ISIL.
- On or about January 19, 2015, the defendant falsely stated that the user of the Twitter account @AmreekiWitness was someone other than Amin.
- m. On or about January 20, 2015, the defendant falsely stated that he had never viewed any information posted by Amin using the @AmreekiWitness Twitter account.
- n. On or about February 27, 2015, the defendant knowingly failed to inform the FBI of the encrypted chat account on which he had communicated with Niknejad, Amin, and others.

o. On or about March 13, 2015, the defendant knowingly failed to provide other accounts he had utilized to engage in conversations with Amin, Niknejad, and others regarding their intent to join ISIL.

(In violation of Title 18, United States Code, Section 1001.)

Dana J. Boente United States Attorney

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Assistant United States Attorney