

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

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UNITED STATES OF AMERICA)

v.)

NAYEF AMJAD QASHOU)

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

3:19cr364-ECM

[18 U.S.C. § 1001(a)(2);
18 U.S.C. § 1519]

INDICTMENT

The Grand Jury charges:

COUNT 1

(False Statement to a Federal Agency)

On or about September 26, 2018, in Lee County, within the Middle District of Alabama,
the defendant,

NAYEF AMJAD QASHOU,

did knowingly and willfully make a materially false, fictitious, or fraudulent statement or
representation 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"), where the offense involved
international terrorism, in that the defendant made false statements to an FBI agent through email,
and in person, as to the nature and content of videos, and the number of said videos, which he
compiled and provided to at least one other individual, in violation of Title 18, United States Code,
Section 1001(a)(2).

COUNT 2

(Destruction, Alteration, or Falsification of Records in Federal Investigations)

Between December 4, 2015 and December 22, 2015, in Lee County, within the Middle
District of Alabama, the defendant,


NAYEF AMJAD QASHOU,

did knowingly alter, destroy, mutilate, conceal, cover up, falsify, or make a false entry in a record with the intent to impede, obstruct, or influence the investigation and proper administration of any matter within the jurisdiction of any department or agency of the United States, or in relation to or contemplation of any such matter or case, where the offense involved international terrorism, to wit: files located on his cellular phone relating to the use of messaging applications, in violation of Title 18, United States Code, Section 1519.

A TRUE BILL:


Foreperson


LOUIS V. FRANKLIN, SR.
UNITED STATES ATTORNEY


Robert K. Nichols, III
Assistant United States Attorney