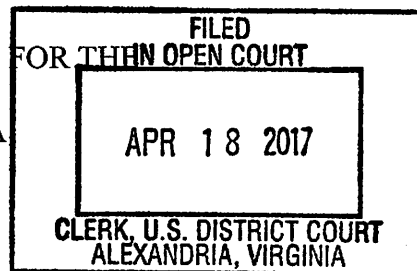


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 SOUFIAN AMRI )  
 )  
 and )  
 )  
 MICHAEL QUEEN, )  
 )  
 Defendants. )

No. 1:17-cr-50

Count 1: 18 U.S.C. § 371  
Conspiracy

Counts 2-3: 18 U.S.C. § 1512  
Obstruction of Justice

Counts 4-5: 18 U.S.C. § 1001  
False Statements

INDICTMENT

March 2017 Term - At Alexandria

COUNT ONE

Conspiracy

Between on or about June 24, 2016, and July 8, 2016, in Fairfax County and elsewhere in the Eastern District of Virginia, defendants SOUFIAN AMRI and MICHAEL QUEEN did unlawfully and knowingly conspire with each other to commit the following offenses against the United States:

A. To corruptly persuade, and to engage in misleading conduct toward, another person with the intent to hinder, delay, and prevent the communication to a law enforcement officer or judge of the United States of information relating to the possible commission of a Federal offense, in violation of Title 18, United States Code, Section 1512(b)(3); and

B. To willfully falsify, conceal, and cover up by any trick, scheme, and device a material fact, and to make materially false, fictitious, and fraudulent statements and representations, in a matter involving international terrorism and within the jurisdiction of

the executive branch of the Government of the United States, in violation of Title 18, United States Code, Section 1001(a).

The purpose of the conspiracy was to prevent the Federal Bureau of Investigation (“FBI”) from learning about and investigating Haris Qamar’s support for the foreign-terrorist organization known as the Islamic State of Iraq and al-Sham (“ISIS”).

In furtherance of the conspiracy, and to achieve its object, the defendants committed overt acts in the Eastern District of Virginia, including, but not limited to, the following:

1. On June 24, 2016, SOUFIAN AMRI told MICHAEL QUEEN that the FBI was asking questions about whether anyone they knew supported ISIS, or attempted to travel overseas for the purpose of joining ISIS.

2. On June 24, 2016, AMRI told QUEEN not to mention Qamar to the FBI so that the FBI would not investigate Qamar and learn about his support for ISIS, and his attempt to travel overseas for the purpose of joining ISIS.

3. On June 24, 2016, AMRI told QUEEN that AMRI falsely told the FBI that a “tall, thin, Indian kid” was the only person that AMRI knew who might support ISIS.

4. On June 24, 2016, QUEEN falsely told the FBI that a “tall, thin, Indian guy” by the name of “Sunit” was the only person QUEEN knew who might support ISIS.

5. On June 28, 2016, QUEEN told Qamar that QUEEN and AMRI gave the FBI the name of a Hindu individual as someone who might support ISIS, and QUEEN said “I’m never going to throw a Muslim underneath the bus to try to do the right thing.”

6. On July 8, 2016, QUEEN falsely told FBI agents that “Sunit” was the only person he knew who supported ISIS, and QUEEN repeated the false statement that he was unaware of anyone who tried to travel overseas for the purpose of joining ISIS.

7. On July 8, 2016, QUEEN falsely denied to FBI agents that Qamar supported ISIS, and QUEEN falsely denied that he knew that in 2014, Qamar had attempted to travel overseas for the purpose of joining ISIS:

(In violation of Title 18, United States Code, Section 371.)

COUNT TWO

OBSTRUCTION OF JUSTICE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 24, 2016, in Fairfax County within the Eastern District of Virginia, defendant SOUFIAN AMRI did knowingly and unlawfully attempt to corruptly persuade another person with the intent to hinder, delay, and prevent the communication to a law enforcement officer or judge of the United States of information relating to the possible commission of a Federal offense. In specific: AMRI did attempt to corruptly persuade Michael Queen to refrain from disclosing to the FBI that Haris Qamar supported ISIS and, in 2014, attempted to travel overseas for the purpose of joining ISIS.

(All in violation of Title 18, United States Code, Section 1512(b)(3).)

COUNT THREE

OBSTRUCTION OF JUSTICE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 24, 2016, in Fairfax County within the Eastern District of Virginia, defendants SOUFIAN AMRI and MICHAEL QUEEN did knowingly and unlawfully engage in misleading conduct toward another person with the intent to hinder, delay, and prevent the communication to a law enforcement officer or judge of the United States of information relating to the possible commission of a Federal offense. In specific: (a) AMRI and QUEEN believed that certain Special Agents of the Federal Bureau of Investigation (“FBI”) were investigating whether individuals known to AMRI and QUEEN had attempted to provide material support to ISIS, a designated foreign terrorist organization; (b) AMRI and QUEEN knew that Haris Qamar supported ISIS and, in 2014, attempted to travel overseas for the purpose of joining ISIS; and (c) AMRI and QUEEN each engaged in misleading conduct by telling the FBI that the only person they knew who might support ISIS, or travel overseas for the purpose of joining ISIS, was a “tall, thin, Indian” individual, and AMRI and QUEEN described that individual in a way that was intended to hinder, delay, and prevent the communication to the FBI, and from the FBI to a judge of the United States, of information for a search warrant, and an arrest warrant, involving Qamar’s support of ISIS and Qamar’s attempt to join ISIS.

(All in violation of Title 18, United States Code, Sections 1512(b)(3).)

COUNT FOUR

FALSE STATEMENTS

On or about June 24, 2016, in Fairfax County in the Eastern District of Virginia, defendant SOUFIAN AMRI did knowingly and willfully falsify, conceal, and cover up by a trick, scheme, and device a material fact, and AMRI made materially false, fictitious, and fraudulent statements and representations, in a matter involving international terrorism and within the jurisdiction of the executive branch of the Government of the United States. In particular, AMRI falsely told agents of the Federal Bureau of Investigation (“FBI”), who were conducting an international-terrorism investigation, that he did not know anyone who supported ISIS, and AMRI falsified, concealed, and covered up facts he knew relating to Haris Qamar’s support for ISIS, a foreign terrorist organization, including Qamar’s 2014 attempt to travel overseas for the purpose of joining ISIS. AMRI also falsely told agents of the FBI that the only person he knew who supported ISIS was a “tall, thin, Indian kid,” which AMRI did for the purpose of falsifying, covering up, and concealing material facts from the FBI.

AMRI’s statements were material to an investigation by the FBI into individuals known to AMRI who supported ISIS. AMRI’s statements were false, fictitious, and fraudulent in that, as AMRI well knew, Haris Qamar was a supporter of ISIS and, in 2014, attempted to travel overseas for the purpose of joining ISIS. AMRI’s mention of a “tall thin, Indian kid” was a trick, scheme, and device intended to falsify, conceal, and cover up Qamar’s support for ISIS by diverting the FBI’s attention to someone other than Qamar.

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

COUNT FIVE

FALSE STATEMENTS

On or about June 24, 2016, in Fairfax County in the Eastern District of Virginia, defendant MICHAEL QUEEN did knowingly and willfully falsify, conceal, and cover up by a trick, scheme, and device a material fact, and QUEEN made materially false, fictitious, and fraudulent statements and representations, in a matter involving international terrorism and within the jurisdiction of the executive branch of the Government of the United States. In particular, QUEEN falsely told agents of the Federal Bureau of Investigation (“FBI”), who were conducting an international-terrorism investigation, that he did not know anyone who supported ISIS, and QUEEN falsified, concealed, and covered up facts he knew relating to Haris Qamar’s support for ISIS, a foreign terrorist organization, including Qamar’s 2014 attempt to travel overseas for the purpose of joining ISIS. QUEEN also falsely told agents of the FBI that the only person he knew who supported ISIS was a “tall, thin, Indian guy” named “Sunit,” which QUEEN did for the purpose of falsifying, covering up, and concealing material facts from the FBI.

QUEEN’s statements were material to an investigation by the FBI into individuals known to QUEEN who supported ISIS. QUEEN’s statements were false, fictitious, and fraudulent in that, as QUEEN well knew, Haris Qamar supported ISIS and, in 2014, attempted to travel overseas for the purpose of joining ISIS. QUEEN’s mention of “Sunit” was a trick, scheme, and device intended to falsify, conceal, and cover up Qamar’s support for ISIS by diverting the FBI’s attention to someone other than Qamar.

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


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FOREPERSON OF THE GRAND JURY

Dana J. Boente  
United States Attorney

By:

  
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Colleen E. Garcia  
Gordon D. Kromberg  
Assistant United States Attorneys