

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	VIOLATION:
	:	
VICTOR RAMOS SANCHEZ	:	18 U.S.C. § 1001(a)(2)
AKA “NASR,”	:	(False Statements)
	:	
Defendant.	:	<u>UNDER SEAL</u>
	:	

CRIMINAL INFORMATION

COUNT ONE-False Statements

The United States Attorney charges that:

1. The Federal Bureau of Investigation (“FBI”) has been investigating foreign terrorist groups, including the Islamic State of Iraq and al-Sham (“ISIS”). ISIS has been designated by the United States Secretary of State as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist (“SDGT”) entity under section 1(b) of Executive Order 13224, who have sought to recruit U.S. persons as supporters and fighters. To gain supporters, recruit fighters, and raise funds, ISIS spreads its message of violent jihad using internet websites and social media platforms. Using these platforms, ISIS posts audio and video—including recruitment messages and updates of events in Syria and Iraq—to draw support. Online chat rooms controlled by ISIS sympathizers effectuate this support.

2. VICTOR RAMOS SANCHEZ, aka NASR (“SANCHEZ”), is a resident of the District of Columbia.

3. At all relevant times, the FBI, an agency of the Executive Branch of the United States government, was conducting a criminal investigation to determine if a group of individuals in Washington D.C. and elsewhere, including the defendant SANCHEZ, were committing federal

offenses relating to terrorism, including but not limited to whether they may be attempting to recruit for ISIS and to travel to ISIS controlled territory in Syria and Iraq, and other crimes (“the FBI Investigation”). A federal grand jury investigation in the District of Columbia was also initiated to investigate these potential offenses. Both the federal grand jury investigation and the FBI Investigation involved possible violations of 18 U.S.C. § 2339B (Material Support for a Foreign Terrorist Organization), to wit, material support of ISIS.

4. The following information was material to the FBI Investigation and the federal grand jury investigation: whether SANCHEZ, and others expressed support for ISIS; whether SANCHEZ and others watched, reviewed and distributed ISIS propaganda; the identity of persons who SANCHEZ and others encouraged to support ISIS; how SANCHEZ and others encouraged supporters of ISIS; whether SANCHEZ and others were training or preparing to fight for ISIS in the United States; whether SANCHEZ, and others had any connection with ISIS members or any person who may have expressed support for committing attacks in the United States on behalf of ISIS; and whether he was aware of any discussion or planning by anyone to travel to ISIS territory to support ISIS.

5. On or about August 8, 2019, SANCHEZ appeared before the Grand Jury on this date and provided testimony under oath. SANCHEZ thereafter answered questions before the federal grand jury posed by an Assistant United States Attorney and members of the Grand Jury. A number of his responses were intentionally, willfully, and materially false, including those discussing his desire to join a foreign terrorist organization, ISIS. Specifically, SANCHEZ’s false statements included the following:

- a. He never distributed material, videos, or images produced by ISIS;

- b. He does not know anyone who distributed material, videos, or images produced by ISIS;
- c. He never discussed or expressed a desire to fight jihad on behalf of ISIS;
- d. He does not know anyone who has ever discussed or expressed a desire to fight jihad on behalf of ISIS;
- e. He never expressed a desire to make hijrah to ISIS territory;
- f. He does not know anyone who has ever expressed a desire to make hijrah to ISIS territory;
- g. He never made plans to travel to ISIS territory;
- h. He never made an agreement to travel to ISIS territory;
- i. He never agreed with anyone to travel to ISIS territory if he saved enough money;
- j. He does not know anyone who has ever made plans to travel to ISIS territory;
- k. He does not know anyone who agreed to travel to ISIS territory;
- l. He never believed ISIS was the legitimate Caliphate; and
- m. He did not know of anyone who believed that ISIS was the legitimate Caliphate.

6. SANCHEZ also was asked in the Grand Jury if he had any contact with P-2 or P-5 after being subpoenaed, and whether he discussed the subpoena with them. SANCHEZ falsely denied multiple times that he met with P-2 or P-5 after receiving the subpoena, but after being asked a third time, SANCHEZ admitted that he had spoken with Hannibal P-2 and P-5 on two occasions after receiving the subpoena. Thereafter SANCHEZ falsely denied they discussed the topic of the grand jury subpoena during those meetings.

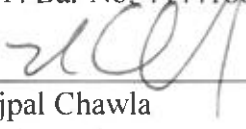
7. On or about August 8, 2019, in the District of Columbia and elsewhere, the defendant, VICTOR RAMOS SANCHEZ, knowingly and willfully make numerous material false statements to matters pending before the judicial branch, that is a federal Grand Jury for the District of Columbia, and the executive branch, that is the U.S. Department of Justice, in the District of Columbia.

(False Statements, in violation of Title 18, United States Code, Section 1001(a)(2))

Respectfully submitted,

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By:



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