

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2339B(a)(1)

v.

CR 20.76 PAM/KMM

MUHAMMAD MASOOD,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

At all times material to this Indictment:

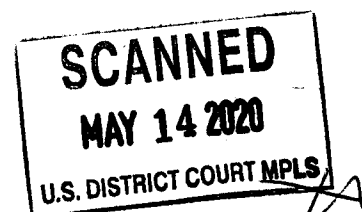
COUNT 1

(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about March 19, 2020, within the State and District of Minnesota, and elsewhere, the defendant,

MUHAMMAD MASOOD,

did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including personnel (namely himself), services, expert advice or assistance and property to a foreign terrorist organization, to wit: the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act , knowing that ISIS was a designated foreign



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terrorist organization, and knowing that ISIS had engaged in, and was engaging in, terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

FORFEITURE ALLEGATIONS

The allegations in Count 1 of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c).

The violation of Title 18, United States Code, Section 2339B(a)(1) alleged in Count 1 of this Indictment is an act of international terrorism, as defined in Title 18, United States Code, Section 2331, against an international organization or foreign government.

The defendant, Muhammad Masood was an individual engaged in planning and perpetrating an act of international terrorism against an international organization or foreign government.

Upon conviction of the offense alleged in Count 1, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), all of his assets, foreign and domestic. The assets to be forfeited pursuant to this paragraph include, but are not limited to, \$4,200 in U.S. currency seized from the defendant on or about March 19, 2020.

A TRUE BILL

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UNITED STATES ATTORNEY

FOREPERSON