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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

CLERK OF COURT

2019 NOV 26 PM 1: 50

UNITED STATES OF AMERICA

CASE NO.

3:18 er 158

V.

INDICTMENT

WALTER H. RICE

NASER ALMADAOJI,

18 U.S.C. § 2339B(a)(1)

FORFEITÜRE

Defendant.

THE GRAND JURY CHARGES THAT:

COUNT ONE

[18 U.S.C. § 2339B(a)(1)]

Beginning on an unknown date, but at least by on or about October 24, 2018, in the Southern District of Ohio, and elsewhere, the defendant, NASER ALMADAOJI, having knowledge that the Islamic State of Iraq and al-Sham ("ISIS") and ISIL Khorasan ("ISIS Wilayat Khorasan") are foreign terrorist organizations, that the organizations have engaged or engage in terrorist activity, and that the organizations have engaged or engage in terrorism, did knowingly attempt to provide material support and resources to ISIS and ISIS Wilayat Khorasan, in the form of personnel (namely, himself) to work under ISIS's and ISIS Wilayat Khorasan's direction and control.

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT TWO

[18 U.S.C. § 2339B(a)(1)]

On or about September 16, 2018, in the Southern District of Ohio, and elsewhere, the defendant, NASER ALMADAOJI, having knowledge that the Islamic State of Iraq and al-Sham ("ISIS") is a foreign terrorist organization, that the organization has engaged or engages in terrorist activity, and that the organization has engaged or engages in terrorism, did knowingly attempt to provide material support and resources to ISIS, namely, translation services.

In violation of Title 18, United States Code, Section 2339B(a)(1).

FORFEITURE

Upon conviction of the offense charged in Counts One and/or Two of this Indictment, the defendant, NASER ALMADAOJI, shall, pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 981(a)(1)(G)(i)-(iv), and 28 U.S.C. § 2461(c), forfeit to the United States:

- a. All of his assets, foreign or domestic (18 U.S.C. §§ 981(a)(1)(G)(i) and (iv) and 28 U.S.C. § 2461(c));
- b. All assets acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing the offense charged in Count One of this Indictment (18 U.S.C. § 981(a)(1)(G)(ii) and 28 U.S.C. § 2461(c));
- All assets derived from, involved in, or used or intended to be used to commit the offense charged in Count One of the Indictment (18 U.S.C. § 981(a)(1)(G)(iii) and 28 U.S.C. § 2461(c));
- d. Any property, real or personal, which constitutes or is derived from proceeds traceable to the offense charged in Count One of the Indictment (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)).

Such assets include, but are not limited to: (1) a Nokia Model 2330L-2, IMEI:

354323045632633, cell phone, (2) Lenovo Ideapad Laptop, Model 5DC001, Serial Number

WES1MTES; and (3) Samsung Model SM-G900A, Serial Number R38G20514EZ.

A TRUE BILL

OREPERSON

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