

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the Eastern District of Virginia

UNDER SEAL

United States of America

v.

Reza Niknejad

Case No. 1:15mj325

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 15, 2014 in the county of multiple in the Eastern District of Virginia, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Rows include 18 United States Code, §2339B; 18 United States Code, §2339A; and 18 United States Code, §956.

This criminal complaint is based on these facts: did unlawfully and knowingly combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury to provide material support and resources, specifically, personnel, to a foreign terrorist organization, namely ISIL, knowing that ISIL was designated a terrorist organization and that the organization had engaged in and was engaging in terrorist activity and terrorism.

Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

Michael P. Ben'Ary, AUSA

Handwritten signature of David L. Martinez

Complainant's signature

David L. Martinez, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: June 10, 2015

City and state: Alexandria, VA

Signature of Ivan D. Davis, United States Magistrate Judge