

AUG - 7 2019

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IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

UNITED STATES OF AMERICA : Criminal No. 1:19-cr-00022 (JPJ)  
 :  
v. :  
 :  
WAQAR UL-HASSAN :  
 :  
 :

**STATEMENT OF OFFENSE**

The offenses described below occurred within the Western District of Virginia, as well as other districts. This Statement of Facts briefly summarizes the facts and circumstances surrounding the defendant's criminal conduct. It does not contain all of the information obtained during this investigation and applicable to an accurate Presentence Report and Sentencing Guidelines calculation.

This statement of facts is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial in the event this plea is later withdrawn notwithstanding any Rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408 and 410, and Federal Rule of Criminal Procedure 11.

The FBI Roanoke Resident Agency ("Roanoke RA") is located in Roanoke, Virginia, which is within the Western District of Virginia. The FBI Roanoke RA and its counterterrorism special agents are charged with international terrorism investigations within, and affecting, the Western District of Virginia. In many cases, these counter-terrorism investigations focus on, among other things, whether an individual has had contact with – or has provided support to – any foreign terrorist organization (FTO).

On or about July 25, 2014, the FBI Roanoke Resident Agency ("RA") initiated an international terrorism investigation of Waqar Ul-Hassan based on information that he was in communication with persons associated with FTOs. At the time the investigation was initiated, the defendant was living in Pakistan.

**I. Count One: Hassan's False Statements Regarding Association with Terrorist or Extremist Groups on May 20, 2015.**

The defendant returned to the United States on May 18, 2015 and resided in and around Glade Spring, Virginia, which is within the Western District of Virginia. On or about May 20, 2015, FBI personnel interviewed the defendant in Abingdon, Virginia regarding his knowledge

*Defendant's Initials: W-H*

of persons who supported or were otherwise associated with FTOs. The defendant was advised by interviewing FBI agents that it was a crime to be untruthful in his statements to the FBI.

During this interview, and after having been reminded by the interviewing agents that it was a crime to be untruthful in his statements to the FBI, the defendant said he did not support any terrorist groups or extremists, and did not know anyone who was a member of a terrorist or extremist group.

On or about November 18 and 19, 2015, the defendant was interviewed by FBI personnel in Charlottesville, Virginia. Although he was not in custody, the defendant was advised of his *Miranda* rights and he signed an acknowledgment that he understood those rights in advance of the interviews. During the interviews, the defendant acknowledged being untruthful in previous FBI interviews regarding his knowledge of persons associated with FTOs. The defendant admitted to extensive contacts with a recruiter from Jaish-e-Mohammad (or "JeM"), who he identified by name. The defendant admitted to exchanging phone numbers with the recruiter and having several conversations about jihad with him. The defendant further admitted he traveled to – and stayed with – JeM extremists for two or three days in 2014, traveled in Pakistan in 2013 and 2014 to collect money and food for JeM extremists, and passed out recruiting newspapers for JeM in Pakistan in 2014. HASSAN admitted that he had not been truthful to FBI agents because he knew JeM was a terrorist group.

## **II. Count Two: Hassan's False Statements About Attempting to Send Money to ISIS on October 16, 2015**

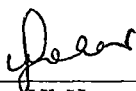
On or about October 16, 2015, HASSAN was interviewed by agents of the FBI Roanoke RA in Bristol, Tennessee. During the interview, HASSAN stated that he never tried to send money to Syria for ISIS and that he never asked Individual A about sending money to ISIS. After further questioning, HASSAN admitted having a conversation with Individual A in which he asked for help about sending \$150 to ISIS in Syria, but said he never intended to follow through with sending the money to ISIS. He further stated that he sought this individual's advice on sending the money because he knew that individual was pro-ISIS.

On November 18, 2015, HASSAN was interviewed by FBI personnel in Charlottesville, Virginia. HASSAN again acknowledged having a conversation with Individual A about sending money to ISIS in Syria, but claimed that he was "not serious" and never intended to send money to ISIS in Syria.

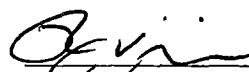
On November 19, 2015, HASSAN was interviewed again in Charlottesville, Virginia. In this interview, HASSAN admitted he was untruthful in his previous statements to the FBI about sending money to ISIS, and that he was serious about sending money to ISIS. In connection with this interview, Hassan signed a statement acknowledging that "[b]ecause I was angry about what was happening to the Muslims around the world, I was serious about sending \$175.00 to the Jihadists in Syria." HASSAN said he "did not send the money because I did not have a way to get the money there."

*Defendant's Initials:* W-H

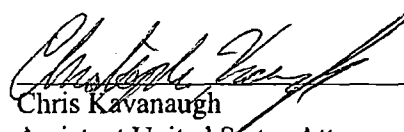
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Waqar Ul-Hassan  
Defendant

Date: 8/2/19

  
\_\_\_\_\_  
Randy Cargill, Esq.  
Counsel for Defendant

Date: 8/7/19

  
\_\_\_\_\_  
Chris Kavanaugh  
Assistant United States Attorney

*Defendant's Initials:* W-H