

10. On or about October 2, 2016, in the Western District of Oklahoma,

-----**NAIF ABDULAZIZ M. ALFALLAJ,**
a/k/a Al-Muthana Al-Najdi,-----

knowingly used a nonimmigrant visa for entry into and as evidence of authorized stay in the United States that he knew to have been procured by means of materially false claims and statements and to have been otherwise procured by fraud. In particular, **ALFALLAJ** submitted his F-2 visa to the Transportation Security Administration in connection with a request for flight training at a private flight school in the Western District of Oklahoma.

All in violation of Title 18, United States Code, Section 1546(a), and Title 18, United States Code, Section 2.

COUNT 3
(False Statement)

11. The Federal Grand Jury incorporates paragraphs 1-6 by reference.

12. On or about December 4, 2017, in Oklahoma City, in the Western District of Oklahoma,

-----**NAIF ABDULAZIZ M. ALFALLAJ,**
a/k/a Al-Muthana Al-Najdi,-----

in a matter within the jurisdiction of the Federal Bureau of Investigation and the Department of Homeland Security, parts of the executive branch of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation during an investigation involving international terrorism. In particular, **ALFALLAJ** stated to federal law

enforcement agents that he had never visited Afghanistan, had never participated in religious, tactical, or military training outside of the Kingdom of Saudi Arabia, and otherwise affirmed that all the answers on his nonimmigrant visa application dated October 18, 2011, were true and correct, when he knew that he had participated in religious, tactical, and military training in Afghanistan at the al Farooq training camp.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
Acting United States Attorney



MATT DILLON
SCOTT E. WILLIAMS
Assistant U.S. Attorneys



C. ALEXANDRIA BOGLE
Trial Attorney
National Security Division