

December 03, 2020

David J. Bradley, Clerk of Court

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to this instrument are
prohibited by court order

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

ABDULRAHMAN MOHAMMED HAFEDH
ALQAYSI

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CRIMINAL NO.: **4:20-cr-641**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(False Statement in Naturalization Application)

On or about January 14, 2016 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 11, on page thirteen of his Form N-400, Application for Naturalization, defendant **ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI** falsely answered “No” when asked if he had “ever been a member of, or in any way associated (*either directly or indirectly*) with . . . A terrorist organization.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

COUNT TWO

(False Statement in Naturalization Application)

On or about January 14, 2016 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 11, on page fifteen of his Form N-400, Application for Naturalization, defendant **ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI** falsely answered “No” when asked if he were “**ever** a part of any group, or did [he] ever help any group, unit, or organization that used a weapon against any person, or threatened to do so.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

COUNT THREE

(False Statement in Naturalization Application)

On or about January 14, 2016 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 11, on page fifteen of his Form N-400, Application for Naturalization, defendant **ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI** falsely answered “No” when asked if he “**ever** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **not** arrested.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

A TRUE BILL

Original Signature on file

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney
Southern District of Texas

By: _____
ALAMDAR S. HAMDANI
Assistant United States Attorney