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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

September 2014 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM DANDACH,  
aka "Fadi Fadi Dandach,"

Defendant.

SA CR No. 14-0109 (A) -JVS

F I R S T  
S U P E R S E D I N G  
I N D I C T M E N T

[18 U.S.C. § 2339B: Attempting to Provide Material Support and Resources to a Designated Foreign Terrorist Organization; 18 U.S.C. § 1542: Making a False Statement on a Passport Application/Use of a Passport Obtained Through a False Statement to Facilitate International Terrorism; 18 U.S.C. § 1512 (c) (1): Attempting to Destroy Records in an Official Proceeding]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 2339B]

On or about July 2, 2014, in Orange County, within the Central District of California, and elsewhere, defendant ADAM DANDACH, also known as ("aka") "Fadi Fadi Dandach," a national of the United States, knowingly attempted to provide material

1 support and resources, that is, personnel, namely himself, to  
2 work under the direction and control of the Islamic State of  
3 Iraq and the Levant ("ISIL"), also known as the Islamic State of  
4 Iraq, al-Qa'ida in Iraq, and the Islamic State, which had been  
5 continuously designated by the Secretary of State as a foreign  
6 terrorist organization since on or about December 17, 2004,  
7 knowing that ISIL had been designated as a foreign terrorist  
8 organization, and knowing that ISIL had engaged in, and was  
9 engaging in, terrorist activity and terrorism.

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COUNT TWO

[18 U.S.C. § 1542]

On or about June 17, 2014, in Orange County, within the Central District of California, defendant ADAM DANDACH, also known as ("aka") "Fadi Fadi Dandach" ("DANDACH"), willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application defendant DANDACH stated that he required a new passport because he had lost his passport as a result of mistakenly throwing it in the garbage, which statement he knew to be false.

Defendant DANDACH committed this offense to facilitate an act of international terrorism, as defined in Title 18 U.S.C. § 2331, namely, an act that: (1) is violent and dangerous to human life that is a violation of the criminal laws of the United States or of any State if committed within the jurisdiction of the United States or of any State; (2) appears to be intended to intimidate or coerce a civilian population, or influence the policy of a government by intimidation or coercion, or affect the conduct of a government by mass destruction, assassination, or kidnapping; and (3) occurs primarily outside the territorial jurisdiction of the United States.

COUNT THREE

[18 U.S.C. § 1542]

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3 On or about July 2, 2014, in Orange County, within the  
4 Central District of California, defendant ADAM DANDACH, also  
5 known as ("aka") "Fadi Fadi Dandach" ("DANDACH"), willfully and  
6 knowingly used a passport, issued under the authority of the  
7 United States, the issuance of which was secured in some way by  
8 reason of a false statement made in the application therefore  
9 which falsely stated that defendant DANDACH required a new  
10 passport because he had lost his passport as a result of  
11 mistakenly throwing it in the garbage, which said passport  
12 defendant DANDACH used by presenting it to a Delta Air Lines  
13 employee for the purpose of traveling to Istanbul, Turkey. This  
14 offense was committed to facilitate an act of international  
15 terrorism, as defined in 18 U.S.C. § 2331.

16 Defendant DANDACH committed this offense to facilitate an  
17 act of international terrorism, as defined in Title 18 U.S.C.  
18 § 2331, namely, an act that: (1) is violent and dangerous to  
19 human life that is a violation of the criminal laws of the  
20 United States or of any State if committed within the  
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22 to be intended to intimidate or coerce a civilian population, or  
23 influence the policy of a government by intimidation or  
24 coercion, or affect the conduct of a government by mass  
25 destruction, assassination, or kidnapping; and (3) occurs  
26 primarily outside the territorial jurisdiction of the United  
27 States.

COUNT FOUR

[18 U.S.C. § 1512(c)(1)]

From on or about July 8, 2014, in Orange County, within the Central District of California, and elsewhere, defendant ADAM DANDACH, also known as ("aka") "Fadi Fadi Dandach" ("DANDACH"), did corruptly attempt to alter, destroy, mutilate, and conceal a record, document, and other object, with the intent to impair its integrity and availability for use in an official proceeding, namely, this criminal case by directing another person to instruct the website administrator to delete DANDACH's post history on that website.

A TRUE BILL

\_\_\_\_\_  
Foreperson

STEPHANIE YONEKURA  
Acting United States Attorney



ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Criminal Division

PATRICK R. FITZGERALD  
Assistant United States Attorney  
Chief, National Security Section

CELESTE CORLETT  
Assistant United States Attorney  
National Security Section

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[18 U.S.C. § 1542]

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