

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 18-26 PJS/SER

UNITED STATES OF AMERICA,

Plaintiff,

v.

TNUZA JAMAL HASSAN,

Defendant.

INDICTMENT

18 U.S.C. § 844(i)

18 U.S.C. § 1001

18 U.S.C. § 2339B(a)(1)

THE UNITED STATES GRAND JURY CHARGES THAT:

At all times material to this Indictment:

On or about October 8, 1999, the United States Secretary of State designated al-Qa'ida, also known as al Qaeda, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive order 13224. To date, al-Qa'ida remains a designated foreign terrorist organization.

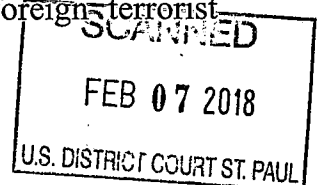
COUNT 1

(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about September 19, 2017, within the State and District of Minnesota, and elsewhere, the defendant,

TNUZA JAMAL HASSAN,

did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), namely personnel, to a foreign terrorist organization, namely, al-Qa'ida, knowing that it was a designated foreign terrorist



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organization and that the organization had engaged and was engaging in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2
(False Statement)

On or about September 22, 2017, within the State and District of Minnesota and elsewhere, in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency of the United States, and in an offense involving international terrorism, the defendant,

TNUZA JAMAL HASSAN,

did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation to FBI agents, in violation of Title 18, United States Code, Section 1001(a)(2), that is, when asked whether she authored and delivered a letter to two fellow students at St. Catherine University in St. Paul, Minnesota, on or about March 27, 2017, that sought to encourage her fellow students to "join the jihad in fighting" and "[j]oin Al Qaeda, Taliban, or Al Shabaab," the defendant stated (1) she did not write the letter, (2) she did not know who wrote the letter, and (3) did not know how the letter came to be delivered to her fellow students, when in fact, defendant HASSAN well knew that she did write and deliver the letter to her fellow students.

All in violation of Title 18, United States Code, Section 1001.

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COUNT 3
(Arson)

On or about January 17, 2018, in the State and District of Minnesota, the defendant,
TNUZA JAMAL HASSAN,
did maliciously attempt to damage and destroy, by means of fire, St. Mary Hall, a building
used in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 844(i).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON