



United States v. Tnuza Jamal Hassan

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

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UNITED STATES ATTORNEY

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FOREPERSON