

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HAMZA NAJ AHMED,

Defendant.

) **INDICTMENT** CR 15-49 MJD/FL  
)  
) (18 U.S.C. § 1001)  
) (18 U.S.C. §2339B(a)(1))  
)  
)  
)  
)  
)

THE UNITED STATES GRAND JURY CHARGES THAT:

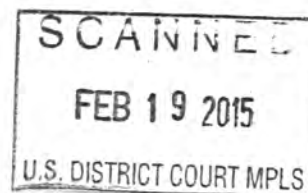
**COUNT 1**

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

From in or about March 2014, through the present, within the State and District of  
Minnesota, and elsewhere, the defendant,

**HAMZA NAJ AHMED,**

did unlawfully and knowingly conspire and agree with others, known and unknown to the  
grand jury, 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, Islamic State in Iraq and the Levant, which the Secretary of State has  
designated as a foreign terrorist organization since on or about May 15, 2014, knowing that  
the organization was a designated foreign terrorist organization (as defined in Title 18,  
United States Code, Section 2339B(g)(6)), and knowing that the organization has engaged  
and was engaging in terrorist activity and terrorism; all in violation of Title 18, United  
States Code, Section 2339B(a)(1).



**COUNT 2**

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

On or about November 8, 2014, within the State and District of Minnesota, and elsewhere, the defendant,

**HAMZA NAJ AHMED,**

did knowingly and intentionally 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 the Islamic State in Iraq and the Levant, which the Secretary of State has designated as a foreign terrorist organization since on or about May 15, 2014, knowing that the organization was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), and knowing that the organization has engaged and was engaging in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

**COUNT 3**

(False Statement)

On or about November 8, 2014, 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,

**HAMZA NAJ AHMED,**

did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation to agents of the FBI, in violation of Title 18, United States Code, Section 1001(a)(2), that is, the defendant stated (1) that he did not know an individual named M.F.,

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(2) that he was traveling alone, and (3) he was traveling from Minneapolis to Madrid, Spain for vacation, when in fact, the defendant knew the person M.F. and was traveling with M.F. and others to Syria.

A TRUE BILL

\_\_\_\_\_  
UNITED STATES ATTORNEY

\_\_\_\_\_  
FOREPERSON