

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

2023 JAN 11 PM 2:27

US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 6:23-cr-03-RBD-EJK
18 U.S.C. § 1001

MOAD MOHAMED BENKABBOU

File Under Seal

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

Foreign Terrorist Organization

1. At all times relevant to this Indictment, the Islamic State of Iraq and al-Sham ("ISIS") was designated by the United States Secretary of State as a Foreign Terrorist Organization (FTO) pursuant to Section 219 of the Immigration and Nationality Act.

COUNT ONE

False Statement to a Federal Agency

2. Paragraph 1 of this indictment is incorporated by reference as if set forth fully herein.

3. On or about August 9, 2022, in the Middle District of Florida, the defendant, **MOAD MOHAMED BENKABBOU**, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of

the United States, and involving international terrorism; that is, during an international terrorism investigation conducted by the Federal Bureau of Investigation, **BENKABBOU** was interviewed by federal law-enforcement officers, asked about a person known to him as “Ahmed,” and specifically, when asked, “Did you ever talk to Ahmed about ISIS or a terrorist organization?,” **BENKABBOU** responded, “No I didn’t.”

4. This statement was false, as **BENKABBOU** then and there well knew that he had expressed his support for ISIS in numerous discussions with that individual from in or about January 2020 to in or about August 2020, including discussions about joining ISIS; ISIS leadership; ISIS operations, training, and logistics; ISIS ideology; and ISIS networks of supporters.

In violation of 18 U.S.C. § 1001.

COUNT TWO

False Statement to a Federal Agency

5. Paragraph 1 of this indictment is incorporated by reference as if set forth fully herein.

7. On or about August 9, 2022, in the Middle District of Florida, the defendant, **MOAD MOHAMED BENKABBOU**, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, and involving international terrorism;

that is, during an international terrorism investigation conducted by the Federal Bureau of Investigation, **BENKABBOU** was interviewed by federal law-enforcement officers, and when asked whether he had ever made plans with an individual known as “Ahmed” or any other individuals, to “travel overseas to join ISIS?,” **BENKABBOU** responded, “No, I didn’t.”

8. This statement was false, as **BENKABBOU** then and there well knew that he had engaged in discussions on numerous occasions with “Ahmed” and other individuals about traveling overseas to join ISIS, and he knew that he had booked a plane ticket in August 2020, to travel overseas to join ISIS, which he later cancelled.

In violation of 18 U.S.C. § 1001.

COUNT THREE

False Statement to a Federal Agency

9. Paragraph 1 of this indictment is incorporated by reference as if set forth fully herein.

10. On or about August 9, 2022, in the Middle District of Florida, the defendant, **MOAD MOHAMED BENKABBOU**, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, and involving international terrorism; that is, during an international terrorism investigation conducted by the Federal Bureau of

Investigation, **BENKABBOU** was interviewed by federal law-enforcement officers, and when asked if he had ever pledged to ISIS, **BENKABBOU** stated, “No, no I did not.”

11. This statement was false, as **BENKABBOU** then and there well knew that he had pledged *bay’at* to support ISIS on or about January 31, 2020.

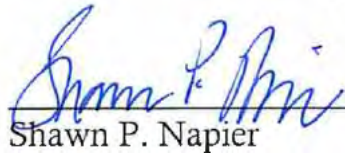
In violation of 18 U.S.C. § 1001.

A TRUE BILL

Foreperson

ROGER B. HANDBERG
United States Attorney

By:



Shawn P. Napier
Assistant United States Attorney

By:



Michael P. Felicetta
Assistant United States Attorney
Chief, Orlando Division

FORM OBD-34

January 23

No.

UNITED STATES DISTRICT COURT

Middle District of Florida

Orlando Division

THE UNITED STATES OF AMERICA


vs.

MOAD MOHAMED BENKABBOU

INDICTMENT

Violations: 18 U.S.C. § 1001

A true bill.


Foreperson

Filed in open court this 11th day of January, 2023.


Clerk

Bail \$ _____
