

FILED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

2014 FEB -5 PM 2:41

FILED IN U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

V.

ABDINASSIR MOHAMUD IBRAHIM,

Defendant.

CRIMINAL NO. SA-14-CR-  
**SA 14 CR 99**

BY **XR**

INDICTMENT

[Violations: 18 U.S.C. § 1546(a), False  
Statement in Regard to Immigration  
Matter - Counts 1-3.]

**THE GRAND JURY CHARGES:**

COUNT 1  
[18 U.S.C. § 1546(a)]

On or about October 25, 2012, in the Western District of Texas, the defendant,

**ABDINASSIR MOHAMUD IBRAHIM,**

did knowingly make under oath and subscribe as true under penalty of perjury a false statement with respect to a material fact in an Application for Naturalization, Form N-400, Part 10, Section B., Question 9.c., that is, the Defendant, when asked

“Have you **ever** been a member of or in any way associated (either directly or indirectly) with a terrorist organization?”

falsely stated “No,” in that the defendant knew he had a direct association with a member of al-Shabaab, a designated Foreign Terrorist Organization, and had provided material support in the form of money to this al-Shabaab member at the al-Shabaab member’s request.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT 2**  
**[18 U.S.C. § 1546(a)]**

On or about October 25, 2012, in the Western District of Texas, the defendant,

**ABDINASSIR MOHAMUD IBRAHIM,**

did knowingly make under oath and subscribe as true under penalty of perjury a false statement with respect to a material fact in an Application for Naturalization, Form N-400, Part 10, Section D., Question 23, that is, the Defendant, when asked

“Have you **ever** given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?”

falsely stated “No,” in that the defendant knew he had falsely claimed on his August 15, 2007, Registration for Classification as Refugee, Form I-590, that he was of a member of the minority Awer clan in Somalia and subject to persecution by the majority Hawiye clan knowing full well that he was in fact a member of the Hawiye clan and not subject to persecution, and that he had falsely claimed “No” on his April 13, 2009, Application to Register for Permanent Residence, Form I-485, regarding question 4 of Part B. “Have you ever ... through any means ever assisted or provided any type of material support to, any person or organization that has ever engaged or conspired to engage, in sabotage, kidnapping, political assassination, hijacking, or any other form of terrorist activity?” knowing full well he had knowingly provided material support in the form of money to an al-Shabaab member at the al-Shabaab member’s request.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT 3**  
**[18 U.S.C. § 1546(a)]**

On or about October 25, 2012, in the Western District of Texas, the defendant,

**ABDINASSIR MOHAMUD IBRAHIM,**

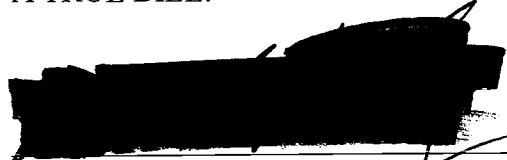
did knowingly make under oath and subscribe as true under penalty of perjury a false statement with respect to a material fact in an Application for Naturalization, Form N-400, Part 10, Section D., Question 24, that is, the Defendant, when asked

“Have you **ever** lied to any U.S. Government official to gain entry or admission into the United States?”

falsely stated “No,” in that the defendant knew he had falsely claimed on his August 15, 2007, Registration for Classification as Refugee, Form I-590, he was of a member of the minority Awer clan in Somalia and subject to persecution by the majority Hawiye clan knowing full well that he was in fact a member of the Hawiye clan and not subject to persecution.

In violation of Title 18, United States Code, Section 1546(a).

A TRUE BILL.

  
FOREPERSON OF THE GRAND JURY

ROBERT PITMAN  
United States Attorney

By:



MARK T. ROOMBERG  
Assistant United States Attorney