	Case 8:20-cr-00146-DOC Document 110 Fi	
		FILED CLERK, U.S. DISTRICT COURT
1		04/27/2022 CENTRAL DISTRICT OF CALIFORNIA
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8	UNITED STATES DISTRICT COURT	
9	FOR THE CENTRAL DISTRICT OF CALIFORNIA	
10	SOUTHERN DIVISION	
11	April 2021 Grand Jury	
12	UNITED STATES OF AMERICA,	No. 8:20-CR-146(A)-DOC
13	Plaintiff,	F I R S T S U P E R S E D I N G I N D I C T M E N T
14	V.	
15	JASON FONG, aka "asian ghazi,"	[18 U.S.C. § 2339B(a)(1): Attempting to Provide Material
16	aka "Jason Asian Ghazi," aka "Mustafa Ahmed Al-Hakim,"	Support to a Foreign Terrorist Organization; 18 U.S.C.
17	Defendant.	§ 981(a)(1)(G) and 28 U.S.C. § 2461(c): Criminal Forfeiture]
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19	The Grand Jury charges:	
20	COUNT ONE	
21	[18 U.S.C. § 2339B(a)(1)]	
22	On or about March 17, 2020, in Orange County, within the Central	
23	District of California, and elsewhere, defendant JASON FONG, also	
24	known as ("aka") "asian_ghazi," aka "Jason Asian Ghazi," and aka	
25	"Mustafa Ahmed Al_Hakim," a national of the United States, knowingly	
26 27	attempted to provide material support and resources as the term is	
27 28	defined in Title 18, United States Code, Section 2339A(b)(1), namely, services, including compiling, archiving, and providing tactical,	
20	services, including compliing, are	iniving, and providing lactical,

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combat, and weapons training materials and information regarding the making of chemical weapons and improvised explosive devices, to Hay'at Tahrir al-Sham, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that Hay'at Tahrir al-Sham had been designated as a foreign terrorist organization, and knowing that Hay'at Tahrir al-Sham had engaged in, and was engaging in, terrorist activity and terrorism.

COUNT TWO

[18 U.S.C. § 2339B(a)(1)]

On or about April 1, 2020, in Orange County, within the Central District of California, and elsewhere, defendant JASON FONG, also known as ("aka") "asian_ghazi," aka "Jason Asian Ghazi," and aka "Mustafa Ahmed Al_Hakim," a national of the United States, knowingly attempted to provide material support and resources as the term is defined in Title 18, United States Code, Section 2339A(b)(1), namely, services, including compiling, archiving, and providing tactical, combat, and weapons training materials and information regarding the making of chemical weapons and improvised explosive devices, to Hay'at Tahrir al-Sham, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that Hay'at Tahrir al-Sham had been designated as a foreign terrorist organization, and knowing that Hay'at Tahrir al-Sham had engaged in, and was engaging in, terrorist activity and terrorism.

COUNT THREE

[18 U.S.C. § 2339B(a)(1)]

On or about May 7, 2020, in Orange County, within the Central District of California, and elsewhere, defendant JASON FONG, also known as ("aka") "asian ghazi," aka "Jason Asian Ghazi," and aka "Mustafa Ahmed Al Hakim," a national of the United States, knowingly attempted to provide material support and resources as the term is defined in Title 18, United States Code, Section 2339A(b)(1), namely, services, including combat training and information regarding the making of boobytraps and improvised explosive devices to Hay'at Tahrir al-Sham, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that Hay'at Tahrir al-Sham had been designated as a foreign terrorist organization, and knowing that Hay'at Tahrir al-Sham had engaged in, and was engaging in, terrorist activity and terrorism.

COUNT FOUR

[18 U.S.C. § 2339B(a)(1)]

On or about May 18, 2020, in Orange County, within the Central District of California, and elsewhere, defendant JASON FONG, also known as ("aka") "asian ghazi," aka "Jason Asian Ghazi," and aka "Mustafa Ahmed Al Hakim," a national of the United States, knowingly attempted to provide material support and resources as the term is defined in Title 18, United States Code, Section 2339A(b)(1), namely, services and currency, including fundraising and money, to Hamas, also known as the Al Qassam Brigades ("Hamas"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that Hamas had been designated as a foreign terrorist organization, and knowing that Hamas had engaged in, and was engaging in, terrorist activity and terrorism.

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(G) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), in the event of defendant's conviction of the offenses set forth in any of Counts One through Four of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in all of defendant's assets, foreign or domestic;

(b) All right, title and interest in any assets, foreign
or domestic, affording defendant a source of influence over any
entity or organization engaged in planning or perpetrating any
Federal crime of terrorism against the United States, citizens or
residents of the United States, or their property;

(c) All right, title, and interest in any asset, foreign or domestic, acquired or maintained by defendant with the intent and for the purpose of supporting, planning, conducting, or concealing any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property;

(d) All right, title, and interest in any asset, foreign or domestic, derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property;

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1	(e) To the extent such property is not available for
2	forfeiture, a sum of money equal to the total value of the property
3	described in subparagraphs (a), (b), (c), or (d).
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3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

Foreperson

/s/

TRACY L. WILKISON United States Attorney

CHRISTOPHER D. GRIGG Assistant United States Attorney Chief, National Security Division ANNAMARTINE SALICK

Assistant United States Attorney Chief, Terrorism and Export Crimes Section MARK TAKLA Assistant United States Attorney Terrorism and Export Crimes Section

26 CHRISTINE M. RO Assistant United States Attorney Terrorism and Export Crimes Section 28