

1 KEVIN V. RYAN (CSBN 118321)
United States Attorney

SEAL BY ORDER
OF THE COURT

2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

9 SAN JOSE DIVISION

10 **CR 03 20046**

Criminal No.

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

VIOLATION: 18 U.S.C. § 1001(a) - False
Statements to Federal Law Enforcement
Agents

SAN JOSE VENUE

14
15 HODA ELSAIDY,
a/k/a Hoda El-Saidy,
16 a/k/a Hoda ElSaidi,
a/k/a Hoda Al-Saidy,

17 Defendant.

18
19 INDICTMENT

20 The Grand Jury charges that:

- 21 1. On or about October 15, 2002, in the Northern District of California, the defendant

22 HODA ELSAIDY,
a/k/a Hoda El-Saidy,
23 a/k/a Hoda ElSaidi,
a/k/a Hoda Al-Saidy,

24
25 did knowingly and willfully make materially false, fictitious, and fraudulent statements and
26 representations in a matter within the jurisdiction of the executive branch of the United States.

27 ///

28 INDICTMENT

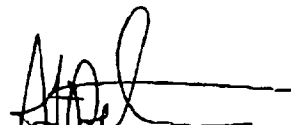
HRL

1 2. Specifically, when interviewed by agents of the Federal Bureau of Investigation, which is
2 responsible for investigating domestic and international terrorism, the defendant made the
3 following materially false statements, knowing at the time these statements were false: (a) the
4 defendant falsely claimed to know of a terrorist "sleeper" cell in Monterey, California; (b) the
5 defendant falsely identified certain individuals as members of this terrorist cell; (c) the defendant
6 falsely stated that this terrorist cell was planning to carry out an attack using multiple bombs on a
7 specific federal facility; and (d) the defendant falsely claimed that one of the identified
8 individuals previously conducted surveillance of this federal facility and forwarded the results of
9 the surveillance overseas to other terrorist conspirators in exchange for \$90,000.

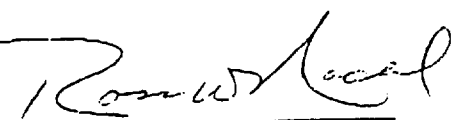
10 All in violation of Title 18, United States Code, Section 1001(a).


11
12 DATED: 4/16/2003

A TRUE BILL.

13
14
15 
16 FOREPERSON

17 KEVIN V. RYAN
18 United States Attorney

19 
20 ROSS W. NADEL
21 Chief, San Jose Branch

22
23 (Approved as to form: 
24 AUSA Braun

25
26
27
28 INDICTMENT