

APPENDIX:

- A). Court of appeals opinion denying certificate of appealability.
- B). District court opinion dismissing rule 60(b) motion.
- C). Indictment (case N:4:21-CR-00041) copy of the federal indictment returned in the eastern district of virginia.
- D). Statement of facts, Government's statement of facts entered during plea proceeding's.
- E). search warrant issued by the eastern district of virginia and inventory list. Including nation (Nothing found).
- F). Presecutor email communications, Email correspondence from the prosecuting attorney, Including threats and coercive statements made during plea negotiations.
- G). Relevant constitutional provisions,
First amendment to the united states constitution: "congress shall make no law respecting an establishment of religion, Or prohibiting the free exercise there off.."
• fourth amendment of the united states constitution "The to the people to be secure in their persons, houses, papers, and effects, against unreasonable search and seizure, shall not be violated, and no warrants shall issus, But upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched and the persons or things to be seized".
• Fifth amendment to the united states constitution: "No person shall.. be deprived of life, liberty, or property, without due process of law".
• Sixth amendment to the united states contitution: "in all criminal prosecutions, the accused shall enjoy the right... to have the assistance of counsel for his defense".
• Eighth amendment to the united states constitution: "Excessive bill shall not be required, Nor excessive fines imposed , Nor cruel and unusual punishments inflicted".
- H). Relevant statutory provisions
.28 U.S.C. §2255(motion to vacate, set aside or correct sentence): provides amechanism for federal prisoner to challenge the legality of their detemtion.
.28 U.S.C. §1915(proceedings in forma pauperis): allow an indigent prisoner to file court actions without perpayment of fees.
.18 U.S.C. §2252A(child pornography offenses): defines federal offenses related to child pornography, Including receipt, distribution, and possession.
- I). Relevant court rules
• Federal rule of criminal procedure 41(search and seizure):

Governs the issuance of search warrants, Particularly concerning the seizure of electronic devices and stored information.

- Federal rule of civil procedure 60(b)(relief from a judgement or order): Allows a party to seek relief from a final judgement under specific grounds, Including fraud, Mistake, Or newly discovered evidence.
- Supreme court rule 39(proceeding in forma puperis): governs the procedures for submitting petitions without paying filing fees when the petitioner is indigent.

J). Additional supporting documentation

. Photographs of petitioner with FBI agents at his residence evidencing confidential informant relationship.

. Reports of suspicious online activities submitted by petitioner to law enforcement including facebook and telegram reports.

. Text messages between petitioner and defense counsel showing:

1). Petitioner informed counsel he could not read english well.

2). Petitioner objected to the statement of facts.

3). Counsel pressured petitioner to accept a plea without proper explanation.

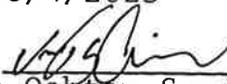
4). Petitioner disclosed his confidential informant work, Including names and contact information of government handlers.

. Certificate of mailing dated march 11, 2024, showing petitioner submitted a responce that the governement falsely claimed was never filed.

. Evidence showing fabricated geographic locations in court records wher petitioner has never lived or visited.

. Personal declaration of petitioner persuant to 28 U.S.C. §1746 attesting to the thruthfulness of the petition and exhibits.

Date: 8/4/2025

Sigh: 
Yasir Qahtan Saud, prose
Reg N: 53668509

Declaration Under Penalty of Perjury Pursuant to
28 U.S.C. § 1746

I, Yasir Qahtan Saud, declare Under Penalty of Perjury That the Information contained in my Petition for writ of Certiorari And supporting Documents is true And Correct to The best of my knowledge And belief.

In Further declare that All Attached Exhibits - Including The Indictment, Statement of Facts, Search Warrant And Inventory, Prosecutor Email Communications, Photographs with FBI Agents, Reports of suspicious Online Activity - Are Authentic Copies of Documents either Filed in my case, generated by government Agencies, Or Personally Authored or Received by me during the events described In the Petition.

Included in the exhibits Are text Messages with my former counsel Showing that I could Not Read or Write english well, Objected to The government's statement of Facts, Wanted to go to trial despite The odds, Disclosed my Confidential Informant status with Names And contacts, And was Pressured Into A Plea without Proper Explanation. These Messages support my sixth Amendment claim of Ineffective Assistance And show the Plea was Not knowing or voluntary.

I Further declare that court Records falsely Place me In states I Have never Lived in or visited. These fabricated geographic References were never corrected And misled the court, Undermining The Integrity of the proceeding.

I also include proof that I submitted a timely response on March 11, 2024, as shown by my certificate of mailing. This contradicts the government's false statement that no response was filed.

I make this declaration in good faith, without assistance of counsel, and respectfully ask the court to consider my petition.

Executed on this 4 day of Aug 2025

Yasir Qahtan Saud, Pro se

Reg # 53668509

FCI Oakdale II

P.O. Box 5010

Oakdale, LA 71463

UNITED STATES OF AMERICA, Plaintiff - Appellee, v. YASIR QAHTAN SAUD, Defendant - Appellant.
UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT
2024 U.S. App. LEXIS 32490
No. 24-6712
December 23, 2024, Decided
November 26, 2024, Submitted

Notice:

PLEASE REFER TO FEDERAL RULES OF APPELLATE PROCEDURE RULE 32.1 GOVERNING THE CITATION TO UNPUBLISHED OPINIONS.

Editorial Information: Subsequent History

Rehearing denied by, Rehearing denied by, En banc United States v. Saud, 2025 U.S. App. LEXIS 4919 (4th Cir., Mar. 3, 2025)

Editorial Information: Prior History

{2024 U.S. App. LEXIS 1}Appeal from the United States District Court for the Eastern District of Virginia, at Newport News. (4:21-cr-00041-RAJ-RJK-1). Raymond A. Jackson, Senior District Judge. In re Saud, 2024 U.S. Dist. LEXIS 45246, 2024 WL 1096542 (E.D. Va., Mar. 13, 2024)

Disposition:

DISMISSED.

Counsel

Yasir Qahtan Saud, Appellant, Pro se.

Judges: Before WYNN, THACKER, and BERNER, Circuit Judges.

Opinion

PER CURIAM:

Yasir Qahtan Saud seeks to appeal the district court's order construing his Fed. R. Civ. P. 60(b) motion as a 28 U.S.C. § 2255 motion and dismissing it as untimely. See *Whiteside v. United States*, 775 F.3d 180, 182-83 (4th Cir. 2014) (en banc) (explaining that § 2255 motions are subject to one-year statute of limitations, running from latest of four commencement dates enumerated in 28 U.S.C. § 2255(f)). As a threshold matter, contrary to Saud's asserting on appeal, we discern no error in the district court's decision to construe Saud's motion as a § 2255 motion.¹ Accordingly, the district court's order is not appealable unless a circuit justice or judge issues a certificate of appealability. See 28 U.S.C. § 2253(c)(1)(B). A certificate of appealability will not issue absent "a substantial showing of the denial of a constitutional right." 28 U.S.C. § 2253(c)(2). When, as here, the district court denies relief on procedural grounds, the prisoner must demonstrate both that the dispositive procedural ruling is debatable and that the motion states a debatable claim of the denial of a constitutional{2024 U.S. App. LEXIS 2} right. *Gonzalez v. Thaler*, 565 U.S. 134, 140-41, 132 S. Ct. 641, 181 L. Ed. 2d 619 (2012) (citing *Slack v. McDaniel*, 529 U.S. 473, 484, 120 S. Ct. 1595, 146 L. Ed. 2d 542 (2000)).

We have independently reviewed the record and conclude that **Saud** has not made the requisite showing. Accordingly, we deny a certificate of appealability and dismiss the appeal.² We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

DISMISSED

Footnotes

1

The district court did not give Saud notice and opportunity to respond to the court's recharacterization prior to construing his motion as an initial § 2255 motion. See *Castro v. United States*, 540 U.S. 375, 383, 124 S. Ct. 786, 157 L. Ed. 2d 778 (2003). However, any potential error was ultimately harmless, as Saud had already missed the one-year deadline to file a § 2255 motion. 28 U.S.C. § 2255(f), and he has not stated sufficient grounds to warrant equitable tolling.

2

Saud has forfeited appellate review of the district court's order denying his motions to produce documents and for judicial notice by failing to adequately challenge the order on appeal. See 4th Cir. R. 34(b); *Jackson v. Lightsey*, 775 F.3d 170, 177 (4th Cir. 2014) ("The informal brief is an important document; under Fourth Circuit rules, our review is limited to issues preserved in that brief.").

UNITED STATES OF AMERICA, Plaintiff - Appellee v. YASIR QAHTAN SAUD, Defendant - Appellant
UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT
2025 U.S. App. LEXIS 4919
No. 24-6712
March 3, 2025, Filed

Editorial Information: Prior History

{2025 U.S. App. LEXIS 1}4:21-cr-00041-RAJ-RJK-1.United States v. Saud, 2024 U.S. App. LEXIS 32490, 2024 WL 5200164 (4th Cir. Va., Dec. 23, 2024)

Counsel For UNITED STATES OF AMERICA, Plaintiff - Appellee: Peter Gail Osyf, Assistant U. S. Attorney, OFFICE OF THE UNITED STATES ATTORNEY, Newport News, VA.

YASIR QAHTAN SAUD, Defendant - Appellant, Pro se, Oakdale, LA.

Judges: Entered at the direction of the panel: Judge Wynn, Judge Thacker, and Judge Berner.

Opinion

ORDER

The court denies the petition for rehearing and rehearing en banc. No judge requested a poll under Fed. R. App. P. 40 on the petition for rehearing en banc.

Entered at the direction of the panel: Judge Wynn, Judge Thacker, and Judge Berner.

For the Court

YASIR QAHTAN SAUD, Petitioner, UNITED STATES OF AMERICA, Respondent.
UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA, NEWPORT
NEWS DIVISION
2024 U.S. Dist. LEXIS 45246
CRIMINAL ACTION NO. 4:21-cr-41
March 13, 2024, Decided
March 13, 2024, Filed

Editorial Information: Subsequent History

Appeal dismissed by United States v. Saud, 2024 U.S. App. LEXIS 32490 (4th Cir. Va., Dec. 23, 2024)

Counsel {2024 U.S. Dist. LEXIS 1} For USA, Plaintiff: Peter G. Osyf, LEAD ATTORNEY, United States Attorney Office - Newport News, Newport News, VA.

Judges: Raymond A. Jackson, United States District Judge.

Opinion

Opinion by: Raymond A. Jackson

Opinion

MEMORANDUM OPINION AND ORDER

Before the Court is Yasir Qahtan Saud's ("Petitioner") *pro se* Motion Pursuant to Federal Rule of Civil Procedure 60(b)(6) ("Rule 60(b)(6)") to re-open and amend the Court's judgment. ECF No. 51 ("Pet'r's Mot."). Petitioner filed a memorandum in support of the Motion. ECF No. 52 ("Pet'r's Mem."). Petitioner additionally filed a Notice of Administrative Filing. ECF No. 54. The Government responded in opposition. ECF No. 55 ("Resp. Opp."). This matter is now ripe for judicial determination. Upon review, the Court finds no meritorious reason to grant Petitioner's Motion. Therefore, Petitioner's Rule 60(b)(6) Motion is **DENIED**.

I. FACTS AND PROCEDURAL HISTORY

On June 30, 2021, a Grand Jury in the Eastern District of Virginia indicted Petitioner on four Counts. ECF No. 3. Counts One and Two charged Petitioner with Receipt of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(2). *Id.* Count Three charged Petitioner with Distribution of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(2). *Id.* Count Four charged Petitioner with Transportation of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(1). *Id.* On {2024 U.S. Dist. LEXIS 2} July 29, 2021, Attorney Chad Dorsk appeared as counsel in this case for Petitioner. ECF No. 18. On December 3, 2021, Petitioner pled guilty to Count One of the Indictment. ECF Nos. 30,31.

According to the Presentence Investigation Report ("PSR"), around August 2020, the National Center for Missing and Exploited Children ("NCMEC") received three cyber tips from Facebook, Inc. regarding the suspected distribution of child pornography through Facebook Messenger. PSR ¶ 13, ECF No. 36. NCMEC gathered the information and forwarded the information to the Bedford County Sheriff's Office ("BCSO"). *Id.* BCSO issued several administrative subpoenas and narrowed the

scope of the investigation to Petitioner. *Id.* Then, BCSO contacted the Federal Bureau of Investigation ("FBI"). *Id.*

Around December 2020, the FBI began investigating Petitioner and learned that in addition to uploading, downloading, and distributing child pornography, Petitioner also created eight email accounts associated with various aliases. *Id.* On March 10, 2021, the FBI executed a lawful search warrant and spoke with Petitioner, who waived his *Miranda* rights and admitted to this illicit conduct. *Id.* Petitioner remembered only five{2024 U.S. Dist. LEXIS 3} email addresses he created with aliases and acknowledged two of his Facebook pages under aliases that he used to communicate in Facebook Messenger groups. *Id.* Petitioner explained that sometimes, he and others in the groups use images of child pornography to shut down a group or an account. *Id.* According to Petitioner, he used child pornography to induce the service provider to block or "burn" the account to ensure that the account was fully disabled, completely deleted any history or archived posts, and preserved the privacy of members. *Id.* Petitioner said the accounts were blocked because of revenge or to prevent an unwanted person access to the account. *Id.* Petitioner also used accounts on WeChat, WhatsApp, Viper, and Telegram. *Id.* Petitioner admitted to uploading child pornography to WeChat and viewing child pornography on Telegram in the past. *Id.* Petitioner is accountable for twenty-eight (28) videos containing child pornography, twelve (12) images containing child pornography, and one (1) video containing sexually explicit conduct with an infant. *Id.*

Petitioner was assessed a Criminal History Category of I and a Total Offense Level of 34. *Id.* ¶¶ 102-03. On April 7, 2022, the{2024 U.S. Dist. LEXIS 4} Court sentenced Petitioner to 60 months imprisonment followed by fifteen years of supervised release.¹ ECF No. 42. Petitioner had fourteen days to appeal his conviction to the United States Court of Appeals for the Fourth Circuit; however, Petitioner did not pursue an appeal. Fed. R. App. P. 4(b). Additionally, Petitioner had one year from the date of judgment to file a 28 U.S.C. § 2255 ("§ 2255 motion") Motion to Vacate, Set Aside, or Correct the Sentence, which he did not pursue. 28 U.S.C. § 2255(f)(1). On December 18, 2023, Petitioner filed his *pro se* Motion Pursuant to Rule 60(b)(6) to obtain and submit newly discovered evidence to prove his actual innocence. On February 5, 2024, the Government filed its response in opposition arguing that Petitioner's Motion is untimely. Petitioner did not file a reply.

II. LEGAL STANDARDS

A *pro se* petitioner is entitled to have his petition and asserted issues construed liberally because *pro se* litigants are held to less stringent standards than attorneys drafting such complaints. *Erickson v. Pardus*, 551 U.S. 89,94, 127 S. Ct. 2197, 167 L. Ed. 2d 1081 (2007). Rule 60(b) provides:

On motion and just terms, the court may relieve a party or its legal representative from a final judgment, order, or proceeding for the following reasons:

- (1) mistake, inadvertence, surprise, or excusable neglect;
- (2) newly discovered{2024 U.S. Dist. LEXIS 5} evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b);
- (3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party;
- (4) the judgment is void;
- (5) the judgment has been satisfied, released or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or
- (6) any other reason that justifies relief.

"[W]hen the party is blameless, his attorney's negligence qualifies as a 'mistake' or as 'excusable neglect' under Rule 60(b)(1). Moreover, both cases require a movant to act in a timely fashion, to avoid unfair prejudice to the non-movant, and to proffer a meritorious defense ... to obtain relief." *Augusta Fiberglass Coatings, Inc. v. Fodor Contracting Corp.*, 843 F.2d 808, 811 (4th Cir. 1988). Rule 60(b)(6) allows a court to relieve a party from final judgment for "any other reason that justifies relief." Fed. R. Civ. P. 60(b)(6). Although Rule 60(b)(6) is a catch-all provision, "a motion under 60(b)(6) may not be granted absent extraordinary circumstances." *Murchison v. Astrue*, 466 F. App'x 225,229 (4th Cir. 2012). "Extraordinary circumstances are those that create a substantial danger that the underlying judgment was unjust." *Id.* (alterations in original) (internal quotations and citations omitted). A party must raise a Rule 60(b) motion{2024 U.S. Dist. LEXIS 6} within a reasonable time and not more than a year after the entry of judgment for reasons one through three. Fed. R. Civ. P. 60(c)(1).

Although Petitioner has characterized his motion as one falling under Rule 60(b), the United States Court of Appeals for the Fourth Circuit has held that district courts must nonetheless examine the substance of such a motion to determine whether it is the "functiona[l] equivalent to a successive [habeas] application," which "depends on the nature of the claims presented." *United States v. Winestock*, 340 F.3d 200,206-07 (4th Cir. 2003). If a petitioner files "a motion directly attacking [his] conviction or sentence," such motion will usually amount to the equivalent of a habeas petition. *Id.* at 207. However, where the motion "seek[s] a remedy for some defect in the collateral review process," then it is properly framed as a Rule 60(b) motion to reconsider, and a district court may address it on its merits. *Id.* at 207. If a motion labeled as one falling under Rule 60(b) should instead be treated as a habeas petition, then it is subject to the rules governing § 2255 proceedings. *Walker v. United States*, No. 4:95CR373, 2014 U.S. Dist. LEXIS 124338, 2014 WL 4388253, at *2 (E.D. Va. Sept. 4,2014). Section 2255(f) provides:

- A 1-year period of limitation shall apply to a motion under this section. The limitation period shall run from the latest of-
- (1) the date on which the judgment of conviction becomes final;
- (2) the date on which{2024 U.S. Dist. LEXIS 7} the impediment to making a motion created by governmental action in violation of the Constitution or laws of the United States is removed, if the movant was prevented from making a motion by such governmental action;
- (3) the date on which the right asserted was initially recognized by the Supreme Court, if that right has been newly recognized by the Supreme Court and made retroactively applicable to cases on collateral review; or
- (4) the date on which the facts supporting the claim or claims presented could have been discovered through the exercise of due diligence.

III. DISCUSSION

Petitioner presents a series of claims to prove his actual innocence. Petitioner alleges ineffective assistance of counsel, affirmative defenses, and governmental misconduct. See Pet'r's Mot.; see also Pet'r's Mem. This argument attacks Petitioner's conviction and does not seek reconsideration of the collateral review process. Accordingly, Petitioner's motion must be characterized as a § 2255 motion.

Construing Petitioner's Motion liberally, he fails to meet the standards outlined in Rule 60(b). In this case, Petitioner's actual innocence claim under Rule 60(b)(6) is improper. Rule 60(b)(1) is the proper avenue for relief for Petitioner's actual innocence{2024 U.S. Dist. LEXIS 8} claim. *Earnest v. Davis*,

No. 7:18-CV-00595, 2023 U.S. Dist. LEXIS 155659, 2023 WL 5673968, at *3 (W.D. Va. Sept. 1, 2023). To seek relief under Rule 60(b)(1), Petitioner must have filed his Motion within one year from the entry of judgment, which he failed to do. See Fed. R. Civ. P. 60(c)(1). Petitioner cannot claim actual innocence under Rule 60(b)(6) to avoid the time limitations attached to Rule 60(b)(1) motions.² See *Wright v. Poole*, 81 F. Supp. 3d 280,291 (S.D.N.Y. 2014). Moreover, Petitioner has not demonstrated extraordinary circumstances that prevented him from filing a timely Rule 60(b) motion. Thus, Petitioner's Motion under Rule 60(b) is untimely.

Additionally, Petitioner fails to meet the standards outlined in § 2255. Petitioner waited 20 months to raise these issues in the instant motion, which he should have raised under a § 2255 motion. However, Petitioner never filed a § 2255 motion, and he cannot now seek to challenge his conviction, which he should have done within § 2255 statute of limitations. See 28 U.S.C. § 2255(f). In other words, Petitioner had the opportunity to contest his innocence before pleading guilty and in a timely filed § 2255 motion. Petitioner signed the Plea Agreement, which incorporated the Statement of Facts attesting his guilt, and at sentencing, he did not raise any objections to the PSR. See ECF Nos. 31, 32, 36, 42. Thus, Petitioner's Motion under § 2255 is untimely.

IV. CONCLUSION

Having reviewed Petitioner's Motion, the Court{2024 U.S. Dist. LEXIS 9} does not find any reason that would justify granting Petitioner relief. Accordingly, Petitioner's Motion is **DENIED**. ECF Nos. 51, 52.

This Court may issue a certificate of appealability only if the applicant has made a "substantial showing of the denial of a constitutional right." 28 U.S.C. § 2253(c); Fed. R. App. P. 22(b)(1). This means Petitioner must demonstrate that "reasonable jurists could debate whether... the petition should have been resolved in a different manner or that the issues presented were 'adequate to deserve encouragement to proceed further.'" *Slack v. McDaniel*, 529 U.S. 473, 484, 120 S. Ct. 1595, 146 L. Ed. 2d 542 (2000) (quoting *Barefoot v. Estelle*, 463 U.S. 880, 893, n.4, 103 S. Ct. 3383, 77 L. Ed. 2d 1090 (1983)); see *United States v. Swaby*, 855 F.3d 233, 239 (4th Cir. 2017). Because Petitioner fails to substantially demonstrate the denial of a constitutional right, a Certificate of Appealability is **DENIED**.

The Court **ADVISES** Petitioner that he may appeal this order by forwarding a written notice of appeal to the Clerk of the United States District Court, United States Courthouse, 600 Granby Street, Norfolk, VA 23510. The Clerk must receive this written notice within sixty (60) days from this Order's date.

The Clerk is **DIRECTED** to mail a copy of this Order to the Petitioner and the United States Attorney, Eastern District of Virginia, World Trade Center, Suite 8000, 101 West Main Street, Norfolk, Virginia 23510.

IT IS SO ORDERED{2024 U.S. Dist. LEXIS 10}.

Newport News, Virginia

March 13, 2024

/s/ Raymond A. Jackson

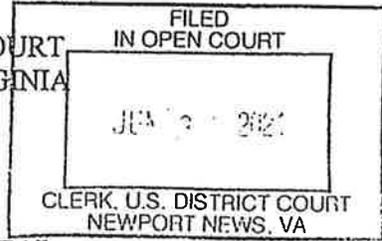
Raymond A. Jackson

United States District Judge

C

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA,

v.

YASIR QAHTAN SAUD,

Defendant.

-) FILED UNDER SEAL
-) CRIMINAL NO. 4:21-cr- 41
-)
-)
-) 18 U.S.C. § 2252A(a)(2)
-) Receipt of Child Pornography
-) (Counts 1 & 2)
-)
-) 18 U.S.C. § 2252A(a)(2)
-) Distribution of Child Pornography
-) (Count 3)
-)
-) 18 U.S.C. § 2252A(a)(1)
-) Transportation of Child Pornography
-) (Count 4)
-)
-) 18 U.S.C. § 2253
-) Forfeiture

INDICTMENT

JUNE 2021 TERM - at Newport News, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Receipt of Child Pornography)

On or about November 15, 2017, in the Eastern District of Virginia, the defendant, YASIR QAHTAN SAUD, knowingly received material containing an image of child pornography as defined by 18 United States Code § 2256(8), to wit: a video file entitled "KBIS3146.mov," depicting actual and simulated lascivious exhibition of a nude prepubescent juvenile male's genitals and anus, that had been mailed using any means and facility of interstate and foreign

commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18 United States Code, Sections 2252A(a)(2) and (b)(1)).

COUNT TWO

(Receipt of Child Pornography)

On or about March 30, 2020, in the Eastern District of Virginia, the defendant, YASIR QAHTAN SAUD, knowingly received material containing an image of child pornography as defined by 18 United States Code § 2256(8), to wit: a video file entitled “IMG_0394.MOV,” depicting actual and simulated lascivious exhibition of a nude prepubescent juvenile female’s genitals and pubic area, that had been mailed using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18 United States Code, Sections 2252A(a)(2) and (b)(1)).

COUNT THREE

(Distribution of Child Pornography)

On or about July 24, 2019, in the Eastern District of Virginia, the defendant, YASIR QAHTAN SAUD, knowingly distributed material containing an image of child pornography as defined by 18 United States Code § 2256(8), to wit: a video file entitled “isoaLISv88iTbGh81000000_2981653315255230_1911262078762860797_n.mp4,” depicting actual and simulated lascivious exhibition of an early pubescent juvenile female’s genitals and anus, that had been mailed using any means and facility of interstate and foreign commerce shipped

and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18 United States Code, Sections 2252A(a)(2) and (b)(1)).

COUNT FOUR

(Transportation of Child Pornography)

On or about August 16, 2020, in the Eastern District of Virginia and elsewhere, the defendant, YASIR QAHTAN SAUD, did unlawfully and knowingly mail, transport and ship using any means or facility of interstate and foreign commerce and in affecting interstate and foreign commerce by any means, including by computer, child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video file entitled "C9bMiztMJX6x7JQ116645906_3102256083198685_426844030363311179_n.mp4," depicting a pubescent juvenile female engaged in sexually explicit conduct, specifically, actual and simulated oral to genital intercourse performed on prepubescent male.

(In violation of Title 18, United States Code, Section 2252A(a)(1) and (b)(1)).

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is hereby notified that, if convicted of any of the violations alleged in this Indictment, the defendant shall forfeit the following property to the United States as part of the sentencing:

a. any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

b. any and all property, real or personal, used or intended to be used to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property; and

c. any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

3. The property subject to forfeiture includes, but is not limited to, the following:

- Western Digital External Hard Drive – S/N: W XK1E848Y2NL
- Sony Laptop Computer – S/N: 275454363035423
- Apple iPhone – S/N: F2MXFSMTKPHG

(In accordance with Title 18, United States Code, Section 2253).

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

United States v. Yasir Oahtan Saud
Criminal No. 4:21-cr- 41

A TRUE BILL:

~~REDACTED COPY~~

FOREPERSON

RAJ PAREKH
ACTING UNITED STATES ATTORNEY

By:



Peter Osyf
Assistant United States Attorney
United States Attorneys' Office
721 Lakefront Commons, Suite 300
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IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division

UNITED STATES OF AMERICA)	
)	
v.)	No. 4:21-cr-41
)	
YASIR QAHTAN SAUD,)	
)	
Defendant.)	

STATEMENT OF FACTS

If the United States were to try this case, the evidence that would be proved beyond a reasonable doubt would be:

1. In or around August, 2020, the National Center for Missing and Exploited Children (NCMEC) received three (3) CyberTips from Facebook regarding the suspected distribution of child pornography through Facebook Messenger between certain known Internet Protocol (IP) addresses.
2. Facebook reported the activity along with: i) the IP addresses used during the transfers; ii) the associated Facebook account subscriber email addresses; iii) listed suspect names; iv) screen names; and v) the associated suspect images.
3. NCMEC generated CyberTip Reports and forwarded the information to the Bedford County Sheriff's Office (BCSO).
4. BCSO issued several administrative subpoenas pertaining to the information contained in the NCMEC CyberTips and narrowed the scope of the investigation to the defendant, YASIR SAUD, as a result of the information returned. BCSO contacted the Federal Bureau of Investigation (FBI).

5. In or around December 2020, the FBI began its investigation of SAUD. The FBI and other law enforcement continued to use a number of investigative techniques, to include but not limited to, additional subpoenas, search warrants, and physical surveillance.

6. In addition to confirming the uploading, distributing, and downloading of child pornography through Facebook Messenger, the FBI also learned that SAUD used at least eight (8) email accounts associated with various aliases used by SAUD.

7. The FBI obtained a lawful federal search warrant for SAUD's residence in Newport News, Virginia.

8. On March 10, 2021, the FBI executed the search warrant referenced in paragraph 7 above and spoke with SAUD. (After waiving his *Miranda* rights) SAUD admitted to his illicit conduct with the following explanation:

- a. SAUD could not remember all eight (8) of his email addresses created with aliases, as referenced in paragraph 6 above, but did list five (5) of them.
- b. SAUD recognized and acknowledged two (2) of his Facebook pages under aliases that he used to communicate in Facebook Messenger groups.
- c. SAUD created email and social media accounts for others in the United States and abroad through which the users, including SAUD, communicated with each other through groups.
- d. SAUD explained that sometimes he used images of child pornography to shut down a group or an account.
- e. Using child pornography to induce blocking – or “burning” as SAUD called it – of an account by the service provider, rather than just trying to delete a group or account by legitimate means, ensured that the account was fully disabled.

completely deleted any history or archived posts, rendered access impossible, and preserved the privacy of the members, according to SAUD.

- f. SAUD said he would “burn” accounts because of revenge or to prevent access by an unwanted person.
- g. SAUD also used accounts on the application platforms: WeChat, WhatsApp, Viber, and Telegram.
- h. SAUD admitted to uploading child pornography to WeChat in 2009 and he viewed child pornography uploaded by others on Telegram in the past.
- i. The FBI showed SAUD sanitized images of child pornography from the NCMEC CyberTips referenced above that SAUD recognized and recalled using to “burn” social media groups he created.

j. Forensic analysis of SAUD’s electronic devices seized on March 10, 2021 also confirmed SAUD’s receipt and distribution of child pornography.

10. During the course of its investigation of SAUD, the FBI received additional NCMEC CyberTip Reports containing child pornography that was traceable to SAUD.

11. Based on SAUD’s admissions, forensic analysis of SAUD’s electronic devices, and the NCMEC CyberTip Reports that traced back to SAUD, SAUD is accountable for:

- a. 28 videos containing child pornography; 2
- b. 12 images containing child pornography; and 2
- c. One (1) of the videos contained sexually explicit conduct with an infant subject. 2

12. The defendant admits that on or about November 15, 2017, in the Eastern District of Virginia, he knowingly received material containing an image of child pornography as defined by 18 United States Code § 2256(8), to wit: a video file entitled “KBIS3146.mov” depicting actual

and simulated lascivious exhibition of a nude prepubescent juvenile male's genitals and anus, that had been mailed using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer in violation of Title 18 United States Code, Sections 2252A(a)(2) and (b)(1)).

13. All of the events described occurred in the Eastern District of Virginia.

14. The acts described above taken by defendant, YASIR QAHTAN SAUD, were done willfully, knowingly, intentionally, and unlawfully and not by accident, mistake or other innocent reason. The defendant further acknowledges that the foregoing statement of facts covers the elements of the offenses charged but does not describe all of the defendant's conduct relating to the offenses charged in this case.

Respectfully submitted,

JESSICA D. ABER
United States Attorney

By: _____
Peter Osyf
Assistant United States Attorney
VA Bar No. 86597
Fountain Plaza Three, Suite 300
721 Lakefront Commons
Newport News, Virginia 23606
(757) 591-4000

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is a partial summary of the evidence which is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

YASIR QAHTAN SAUD
Defendant

Date

I am YASIR QAHTAN SAUD's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Chad G. Dorsk, Esq.
Counsel for defendant

Date

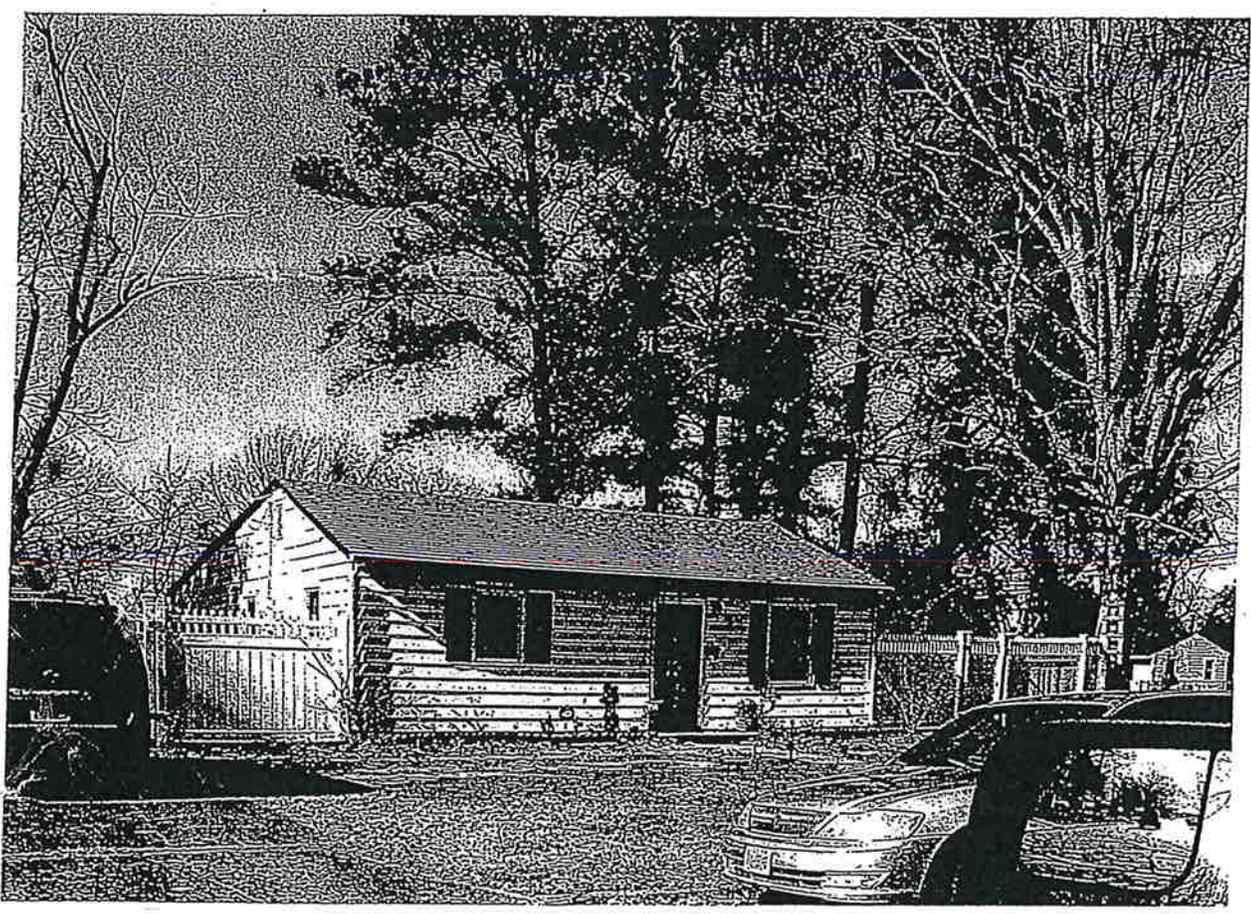
E

ATTACHMENT A

PREMISES TO BE SEARCHED

The premises to be searched is the residence and all outbuildings and vehicles contained thereupon the property as follows:

The residence located at 917 79th St., Newport News, VA, 23605 (the "SUBJECT PREMISES") which is further described as a single-story house with white siding and a white fence encompassing the backyard. The numbers "917" are in black affixed above the black mailbox to the right of the front door.



UNITED STATES DISTRICT COURT

for the
Eastern District of Virginia

In the Matter of the Search of
*(Briefly describe the property to be searched
or identify the person by name and address)*

917 79th Street
Newport News, VA, 23605

Case No. 4:21-SW-37

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Virginia
identify the person or describe the property to be searched and give its location):

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal *(identify the person or describe the property to be seized):*

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before March 23, 2021 *(not to exceed 14 days)*
 in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to ROBERT J. KRASK
UNITED STATES MAGISTRATE JUDGE
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*

for days *(not to exceed 30)* until, the facts justifying, the later specific date of

Date and time issued: 03/09/2021 10:00 am

Robert J. Krask
Judge's signature

City and state: Norfolk, Virginia

The Honorable Robert J. Krask
Printed name and title

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
Receipt for Property Received/Returned/Released/Seized

File # _____

On (date) 3/10/2021

- item(s) listed below were:
- Received From
- Returned To
- Released To
- Seized

(Name) _____

(Street Address) 917 79th Street

(City) Newport News, VA

Description of Item(s): Alcatel phone w/ cracked case; Blue Samsung cell phone
BIT Laptop; Pink Nokia cell phone; Silver Acer laptop, black HP
Pavillion laptop; Akata hard drive; Samsung cell phone w/ flower case;
Silver Samsung Galaxy S8; WD Hard drive; Green flash drive;
iPad w/ black case; iPad; XGODY Tablet; White Samsung tablet
White iPhone in Pink Hello Kitty case; Black Motorola cell phone;
Black Samsung cell phone; Alcatel cell phone, Black cell phone, Green
flash drive; Silver ANS cell phone, Sony camcorder; Sony V10
laptop; Black iPhone in black case; Black LG tablet; Black
COMPAQ Desktop; Black LG cell phone; iPhone gold & white;
iPad Blue & white, White Samsung cell phone; Black & White
cell phone, Black phone, Black Motorola cell phone; Black Amazon
tablet, Black Samsung Galaxy S8; Black Samsung cell phone;
Red & Black flash drive; SIM Card in packaging.

~~NOTHING FOR~~

**UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
Receipt for Property**

Case ID: _____

On (date) July 6, 2021

item (s) listed below were:

- Collected/Seized
- Received From
- Returned To
- Released To

(Name) Dunya Salman

(Street Address) 917 79th St.

(City) Newport News, VA

Description of Item (s): 1) Alcatel phone (model A466BG); 2) Samsung phone GT-E9300; 3) Bean Information Tech Tablet; 4) Nokia cell phone; 5) Acer Laptop computer; 6) HP Laptop computer; 7) ADATA external hard drive; 8) Samsung phone SM-J327P; 9) Samsung Galaxy S8; 10) micro SD card reader; 11) iPad A1395; 12) XGODY Tablet; 13) Samsung Tablet; 14) iPhone A1349; 15) Motorola Droid MAXX; 16) Samsung phone GT-E9100; 17) Tracfone; 18) MIO Plus phone; 19) ANS cell phone; 20) Green USB Thumb drive; 21) Sony video camera; 22) iPhone A1660; 23) LG tablet; 24) Compaq Presario computer; 25) LG cell phone; 26) iPhone A1778; 27) Apple iPod A1574; 28) Samsung phone; 29) iPhone A1530; 30) iPhone A1387; 31) Motorola phone A950; 32) Amazon tablet; 33) Samsung phone SM-G950U; 34) Samsung phone SPH-L720; 35) Sandisk Thumb drive;

MS 7/6/21

SA. H. I.

Gmail

USA v. Yasir Saud

Chad G. Dorsk <cdorsk@gmail.com>
To: "Osyf, Peter (USAVAE)" <Peter.Osyf@usdoj.gov>

Fri, Oct 8, 2021 at 7:53 AM

Hey Pete,

Several things: 1. Plea offer request 2. Whether the agents are interested in debriefing and possibly using Saud to make connections via computer regarding illegal activity as part of R35b and 3. Are you opposed to another continuance.

Please let me know, otherwise i cant really move forward.

Chad

Chad G. Dorsk, Esquire
Dorsk Law Office, Plc.
Office: (757)423-0271
Fax: (757)423-0272
Cell: (757)677-6994

CONFIDENTIALITY NOTICE: This message is being sent by or on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of this message.

Osyf, Peter (USAVAE) <Peter.Osyf@usdoj.gov>
From: "Chad G. Dorsk" <cdorsk@gmail.com>

Tue, Oct 12, 2021 at 1:40 PM

Hey Chad,

Again, the government's offer – as first articulated to the defendant through Ms. Kmet, the very first time you and I discussed this case, every subsequent discussion thereafter, and as expressed directly to Saud from me at his hearing – remains the same: Plead to one count of Receipt of Child Pornography. The government has even offered, which I am now beginning to regret but of course will still honor, a B-plea for a recommendation of the mandatory minimum of five years. Also as expressed directly to Saud at his hearing, barring an extremely unlikely act of Congress within the next three weeks removing the statutory mandatory minimum that applies to all four counts for which he is charged, there is literally no better deal that he can be offered. His choice is as binary as possible at this point: A) take the plea and most probably get the five years, or B) go to trial, which he will most certainly lose, and I will pursue the highest reasonable sentence (above 5 years) possible for wasting the Court's time... which Judge

Jackson will also not appreciate.

I have spoken to SA Sullivan about Saud's repeated requests to offer information. The FBI has done its due diligence and is not interested in any information Saud thinks he may have.

I will reluctantly not oppose one more continuance if you truly feel you need one for some reason, but that is only for you, not Saud. He is stalling and knows it, nothing more. He is guilty, has talented representation, and the best possible deal in front of him. There is no better situation he could find himself in right now than the one he is in. He may not like his two options, but they will remain the only two he has regardless of how long he prolongs the inevitable or who he has for counsel.

Thanks,

Pete

Peter Osyf

Assistant Attorney General

Phone: (202) 501-8021

Chad G. Dorsk <cdorsk@gmail.com>
To: "Osyf, Peter (USAAE)" <Peter.Osyf@usdoj.gov>

Tue, Oct 12, 2021 at 2:29 PM

Thanks Pete

Chad G. Dorsk <cdorsk@gmail.com>
To: Natalie Sidner <nataliesidner@gmail.com>

Wed, Oct 13, 2021 at 6:57 AM

Yasir, this is the government's response to your desired corrections to the SOF.

Yasir Saud

Osyf, Peter (USAVAE) <Peter.Osyf@usdoj.gov>
Chad G. Dorsk <cdorsk@gmail.com>

They do not agree. Wed., Nov 17, 2021 at 10:07 PM

-Chad 11/21/21

Chad,

Sorry, bud... I was in court most of today, then meetings and catching up on missed work that had to take priority.

While I always appreciate your zealous advocacy and I am hoping that most of this is being driven by Saud rather than his competent counsel, it is becoming tiresome if not borderline ridiculous.

First it apparently needs to be made abundantly clear to your client that -- as every SOF expressly begins and as will be repeated several times during his colloquy -- the information in the SOF is NOT "the information that the parties agree is relevant documentary evidence from discovery that prove defendant's conduct beyond a reasonable doubt is." It is however, "If the United States were to try this case, the evidence that would be proved beyond a reasonable doubt would be:" (emphasis added). This includes, and not insignificantly, what evidence will be presented at trial by way of witness testimony. Obviously an agent's notes and 302's are helpful in determining what will be testified to, but they will not be the evidence presented at trial: I use the notes and 302's to draft my SOFs and then, as always, I have the case agent review before offering to the defendant. In this case, due to your client's dizzying reluctance, I have also conferred with SA Mitchell and SA Wolpert as well to ensure I know what will be elicited from the stand "[i]f the United States were to try this case "

That said, let's discuss these "discrepancies." First of all, I am not sure why, if you read through the typed 302, your email only references SA Wolpert's handwritten, shorthand notes rather than the actual 302 written contemporaneously and collaboratively by both agents who were present -- far more reliable. However, worse yet, is that you are incredibly selective in your note selection and interpretation which, when a defendant (as they almost always do) starts with full denial and progressively moves to "I'm not sure," "maybe," "but only once," to "yes," of course one can cherry pick the agent's notes where they record the defendant's denials. Yes, SA Wolpert noted on PROD001_00000400 that Saud said, "never uploaded anything." SA Wolpert also noted on PROD001_00000402 (as you confusingly referenced yourself) that Saud then said, "uploaded once, long time ago -- 2009." Never uploaded anything .. or uploaded once? Or how about PROD001_00000408 where it is noted that "S. Says doesn't remember uploading anything recently -- maybe back in the day to blow up group but not recently." Some of the stuff you referenced might have some semantical arguments -- although I'm not sure how someone speaking generally about what happens in groups of which they admittedly are a part, necessarily means that they never participated in themselves -- but that last statement at PROD001_00000408 seems pretty unambiguously clear. Before squabbling over the shorthand notes, you may want to revisit the actual 302 which clarifies most, if not all, of those potential semantical arguments up for speculation. On PROD001_00000392 for instance: "Initially, SAUD said he never uploaded child pornography. Later, SAUD admitted he uploaded child pornography sometime around 2009 on eChat in order to burn someone's account or group." Or on PROD001_00000395 where SA Wolpert's shorthand notes are fleshed out by the combined contemporaneous memory of both agents: "SAUD reiterated he did not upload child pornography recently. The only time SAUD uploaded child pornography was to burn a social media group a long time ago." The handwritten notes and the 302 coincide almost perfectly -- as they ought to do. It is from them

that the SOF was conceived, which further has been reviewed by the agents who confirmed allies with their would-be testimony, i.e., the evidence that would be presented at trial.

But we needn't rely on their vetted, consistent, credible word. What about on PROD001_00000393 where Saud recognizes a series of sanitized child pornography images that he acknowledges were "used to burn social media groups multiple times before" and "were used for revenge purposes?" Interesting... those images were all from CyberTip Reports traceable to Saud, not just by their transfer via accounts he created *and used*, but by the IP addresses of Saud's residence and place of work through which they were received and/or distributed and resulted in "burned" accounts.

As for the confidential informant claim... no. We have already discussed that his "credentials" have been run to ground. Saud was a CI for the FBI and NNPD long ago, but has not produced any actionable intel for many years. He has zero credibility and no one wishes to "debrief" him. And that is not why he spoke with SAs Wolpert and Mitchell. In order to speak with Saud without causing a scene in front of his family -- as is often attempted in these cases for the defendant's benefit to save embarrassment or worse -- SAs Wolpert and Mitchell initiated the conversation based on Saud's recent application for citizenship, which conveniently allowed the agents to address "concerns" over his conduct. Which comes to the Miranda issue that Saud also conveniently "does not recall" correctly either. Thankfully the 302 states, "SAUD was informed of his rights under Miranda verbally by Special Agent Paul Wolpert of Homeland Security Investigations, and in writing via the FBI Form FD-395." Which just so happens to be supported by PROD001_00000410. He also gave written consent to search his three cars and cell phone on PROD001_00000411. Both are attached in one PDF.

There is one section of your email I agree with: "Regarding the infant subject in paragraph 11c. I recall speaking with you and I thought it would be removed as there is no clear intent to produce a sexually explicit video. I think that to assert that he sexually exploited his child is a little much, maybe that's just my opinion but I think it's certainly up for debate." Yes, we did talk about how the "intent to produce a sexually explicit video" is certainly "up for debate" with regard to that video.. Which is why, as I wrote in my email, "a production count would be *slightly* more difficult to prove at trial than the other charges." That intent to produce a sexually explicit video undoubtedly would be the most heavily litigated element. And, while I don't think it would be unprovable, "I thought that a 15-year mandatory minimum was a little steep for his conduct overall," and therefore elected not to charge production. I too thought such a charge would be "a little much." However, that significantly higher burden of "intent to produce" is of absolutely zero consequence to, and is not a factor for, consideration at all in applying the 4-point CP enhancement pursuant to U.S.S.G. § 2G2.2(b)(4) for "material that portrays . . . sexual abuse or exploitation of an infant or toddler." Which, again, is completely moot as he most likely will get the mandatory minimum if he pleads... a gift he most likely would not receive were he to proceed to trial.

But, if Saud, a man who:

- Constantly changes his stories
- Admits (at least some of the time) to receiving and distributing child pornography
- Makes all kinds of fraudulent accounts for countless people
- Meets females, who aren't his wife through Facebook groups
- Created emails to intentionally portray himself as a female to attract females
- Was concerned that Agents would find videos of him having sex with his girlfriend (not his wife) on his phone
- Had child pornography on his devices
- Thinks child pornography is not a big deal if it is used as "revenge" in a cyberbully way to "burn" peoples' accounts
- Did not report individuals in his groups who posted child pornography for fear of being "blacklisted" from those types of groups he wanted to be a part of
- Has discredited himself as a confidential informant with two law enforcement agencies

- Failed a polygraph
- And takes videos of himself playing with his infant son's penis

wants to go to trial against:

- Three federal agents with impeccable records
- A remarkable forensic expert
- And irrefutably damning evidence

on a child pornography case, that is certainly his choice... and I am more than happy to try this case. But the government is done with capitulating. The Plea Agreement and SOF (v.2) previously offered is final.

Thanks,

Pete

Peter Ouyf

Assistant Federal Attorney

11/21/21

11/21/21

11/21/21 2:40:00

3 attachments

 PROD001_00000410.pdf
371K

 Plea Agreement (SAUD).pdf
170K

 Statement of Facts (SAUD) v.2.pdf
115K

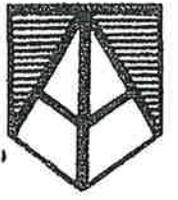
J







دار الحكمة للترجمة
Arab American Translators



In the Name of God, Most Merciful, Most Compassionate

To: Ministry of Interior, Directorate of Public Affairs

Subject: Suspicious Activity

Greetings,

I have reported the activity of some Facebook and telegram groups. These groups invite young girls (ages 7 to 15). Many sexual videos were released and because of one of those videos, a girl from Basrah province was killed.

I attached the names of those groups so you can take the appropriate actions. With Respect.

Quenat aliraq

Hala Bil Khamis

Fikat Baghdad

Yasir Altimimi

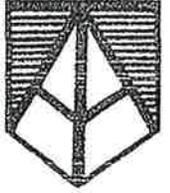
September 10th, 2016



I, Radwan Hakim, Active member of the American Translators Association since 1981, competent in Arabic & English certify herein that the foregoing is a true translation of the attached Arabic document, rendered this 12th day of Sept. 2023.



دار الحكمة للترجمة
Arab American Translators



In the Name of God, Most Merciful, Most Compassionate

To: Ministry of Interior

Subject: Report

Greetings,

I would like to bring to your attention to some public and private groups activities on Telegram. These groups sell sexual videos of children. These children are from Iraq, and some other Arab countries, especially Saudi Arabia. These groups are run by an Iraqi person.

Attached is the specific information of these groups for your consideration. With respect.

Yasir Altimimi

June 18th, 2017

=====
I, Radwan Hakim, Active member of the American Translators Association since 1981, competent in Arabic & English certify herein that the foregoing is a true translation of the attached Arabic document, rendered this 12th day of Sept. 2023.



← Reports about others

violence.

🌐 2 new updates

November 13, 2020

! **You anonymously reported Erdblume
Erdblume's photo for promoting
violence.**

🌐 2 new updates

November 13, 2020

! **You anonymously reported Erdblume
Erdblume's photo.**

🌐 2 new updates

November 13, 2020



You anonymously reported
MamaManili's photo for displaying
nudity.

November 13, 2020

! You anonymously reported Helena
Lundbäck - Erdblume - GP Aachen
2009's photo for promoting violence.

November 13, 2020

**You anonymously reported Erdblume
Erdblume as a fake account.**

🌐 2 new updates

November 13, 2020

! You anonymously reported photo for
displaying nudity

November 13, 2020

← Support Message



Friday, November 13, 2020 at 9:44 PM

We couldn't review your report

There was a technical issue with the system we use to track reports, and we couldn't review the report you submitted on Fri Nov 13, 2020 9:44pm.

You can try submitting the report again.



Friday, August 17, 2018 at 1:10 AM

We received your report

Thanks for letting us know about something that might go against our Community Standards. Reports like yours help keep Facebook safe and welcoming for everyone.

We'll notify you when your report has been reviewed.

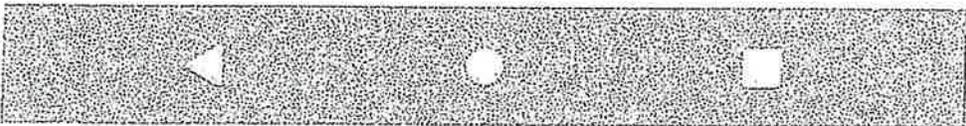
In the meantime, see options to help you control what you see.

[See options](#)

← VID_20230203_132609_811.mp4



This file has been banned for violations



2:46

all [signal icons]

< [profile icon] [profile icon]

[profile icon]

Linzy

I received some paperwork from the probation officer. they want me fillso them out an sign them. but I don't read English. you know so can you tell them until I have a translation of what I am signing I won't be signing anything. thank you.

With all due respect Yasir, how are you texting me if you can't read English

I have other inmates typing what I'm telling them verbally and they writing it for me and put the words together to make sense to you guys. that why it took me so so long to respond. and I've mention in to you guy's before I do not read or write English so well. thanks.

Ok, I understand now.

[camera icon] [attachment icon] Attachment: 1 Image [share icon]

[app icons]

3:14



Lazy



Please have chad read this message thoroughly.

For your knowledge, the way that I communicate with you is by sending my wife what I want to send to you on the tablet in the jail, then she sends it to you, then she returns your response by sending it to me on the tablet. it is also important to note that since English is not my first language, I have other inmates that interpret the messages for me and help me formulate and write my responses to you.

Apr 28 2022 Fri 11:51 AM



Apr 28 2022 Fri 12:11 PM

Hello?

Yasir?

Apr 28 2022 Fri 12:18 PM

Oh!!!



3:42



Lazy



Nov 22, 2021 11:41 AM

Chad,

Thank you for forwarding your correspondence from the prosecutor. It helped answer some of the questions I had.

I am mailing a list of rebuttal statements to each of the prosecutor's points along with other letters that contain other facts that pertain to my case. I you would like to pass these statements along to the prosecutor, if you feel that would help.

Please read the letters I send, make a decision in my best interest, and I will agree to what you think is best to do. I am still willing to go to trial if you think there is a chance of winning, no matter how small it may be. If not, I am willing to sign the plea despite the fact that the statement of facts contains lies I find hard to admit to.



Messages



Exhibit J.02

3:39



Larry



Hey Chad,
I talked to my wife so if you still feel
if I go to trial I will lose I will plea..
and I remember that you told me
they don't offered better deal,
please just try one more time if they
don't I will take this one.. as I
translated the plea it say's 5 up 20
years.. is this deal is guaranteed I
will be sentenced to no more than 5
years as you told me.. I want to
make sure its guaranteed time not
5-20., and I'm willing to take Alford
plea.. let me know and thank you so
much for every thing..

One more thing do I have to sign
the statement of facts as part of
the plea? I don't feel comfortable
signing it because it's not true and
accurate..

Chad replied,

"A better deal has been rejected
and not available. I sent a copy of
the email from Peter Osvf to Duvva



Exhibit. J.03

3:44

all 5



Linzy



I'm not quite certain why we continue to discuss this, Mr. Saud. I forwarded you the email thinking you'd see how firm, vocal, and demonstrative the prosecution is being in their stance. Your rebuttals would be entirely futile.

As I've stated unequivocally, I recommend you take the guilty plea and not go to trial. The plea hearing is set for 2 p.m. this Friday. I will be there at the courthouse by 1:00 to speak in person.

Nov 20 11:22 AM

I would like you to read what I sent you. hopefully you'll receive the letters before Friday. if that is how you feel though, I will sign the plea. See you Friday...

Nov 4 10:22 AM

chad,
the medical ailments I told you about have been getting worse, and



Exhibit J.03

3:05



Lincy



"Basically. All of the things in the psr are from the statement of facts, which was reviewed with you. Any objections are only going to hurt, because they were accepted signed and what the government wanted in exchange for a recommendation of 5 years to serve."

"As far as prison and which you will go to, that's up to the bureau of prisons. They evaluate you and send you where they think you'll get the best treatment"

"The government agreed with me that you did not intend to create child pornography but that they believed nonetheless that it met the criteria"

10/28/2020 3:05 PM

Good morning

Chad, one question you did not respond to was the restitution please? When will I know if its required and how much will be



Exhibit. J. 4

3:26



Lazzy



MR. DORSK,
LAST TIME WE SPOKE YOU
MENTIONED THAT MY WORK
WITH LAW ENFORCEMENT DID
NOT QUALIFY BECAUSE I WAS
NOT LAW ENFORCEMENT!
PLEASE LOOK AT RULE 12.3 (A)
(1-3) OF THE FEDERAL RULES OF
CRIMINAL PROCEDURE COVERS
THIS IN DETAIL...

VERY RESPECTFULLY
YASIR SAUD

Ok Thank you, I'll pass this along to
him right now

END OF MESSAGE

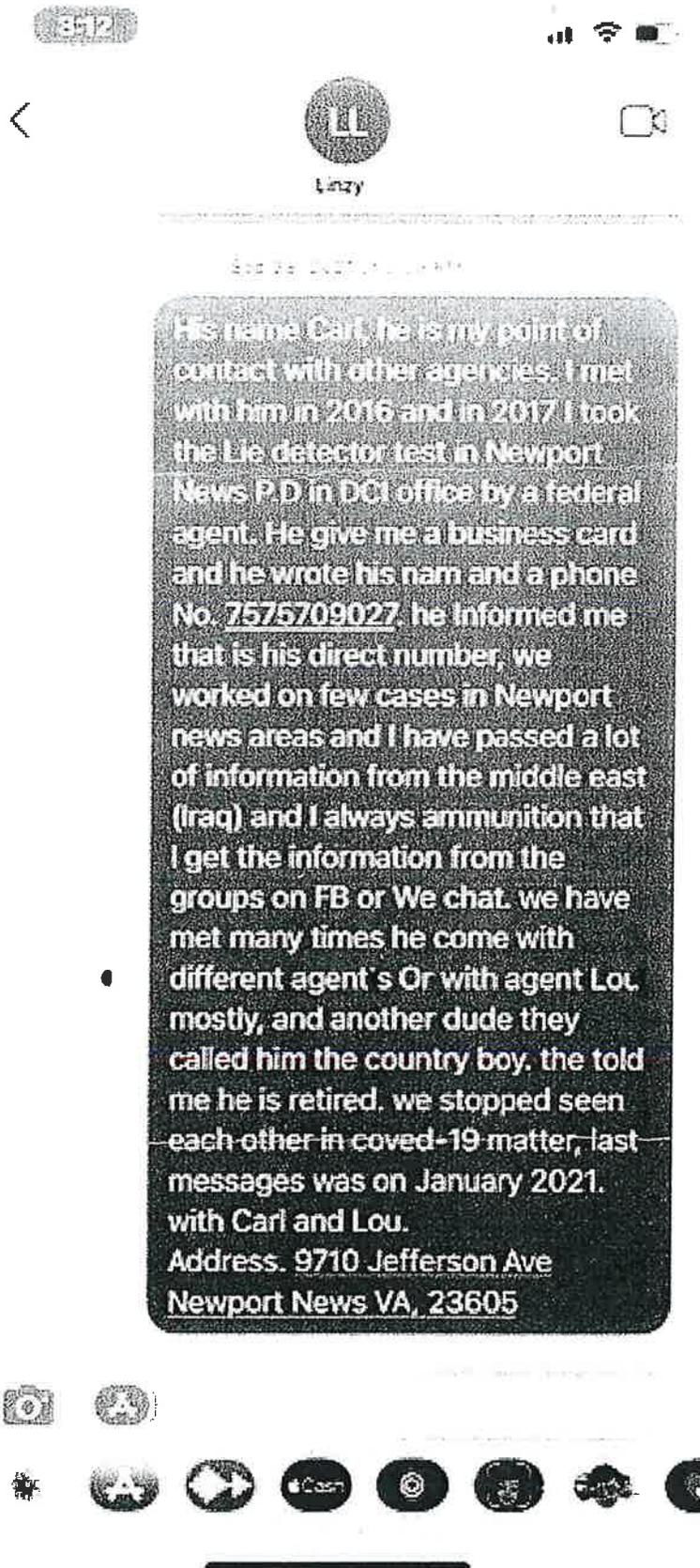
Mr. Dorsk can you send me only
these parts of my discovery, the
statement made by me, the
statement made by the FBI and the
statements made by the 2
homeland security agents. also I
need a copy of your work
statement on what you have done
for my case and a copy of the plea



Message



Exhibit. J. 4



3:12

LL

Lizzy

Wed Jan 20 2021 11:11 AM

His name Carl, he is my point of contact with other agencies. I met with him in 2016 and in 2017 I took the Lie detector test in Newport News P.D in DCI office by a federal agent. He give me a business card and he wrote his nam and a phone No. 7575709027. he informed me that is his direct number, we worked on few cases in Newport news areas and I have passed a lot of information from the middle east (Iraq) and I always ammunition that I get the information from the groups on FB or We chat. we have met many times he come with different agent's Or with agent Lou, mostly, and another dude they called him the country boy, the told me he is retired. we stopped seen each other in coved-19 matter, last messages was on January 2021. with Carl and Lou.
Address. 9710 Jefferson Ave
Newport News VA, 23605



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YASIR GAHARA
SAUD
Reg. No: 53668509

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A-B

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MAR 11 2024



Person Summary



Name:

YASIR SAUD



Address History



Current Address

Address:

917 79th St, Newport News, VA 23605

Date Reported:

3/2024



Previous Address 1

Address:

469 Youngs Mill Ln Apt B, Newport News, VA 23602

Date Last Seen:

8/2018



Previous Address 2

Address:

3778 Sherwood Pl Apt I, Newport News, VA 23602



Previous Address 3

Address:

332 E Broadway Ave, Girard, OH 44420



Previous Address 4

Address:

6a San Juan St, Boston, MA 02118



Previous Address 5

Address:

1477 Summersweet Ct, Gulf Breeze, FL 32563



Phone Numbers



(757) 912-9044

Type:

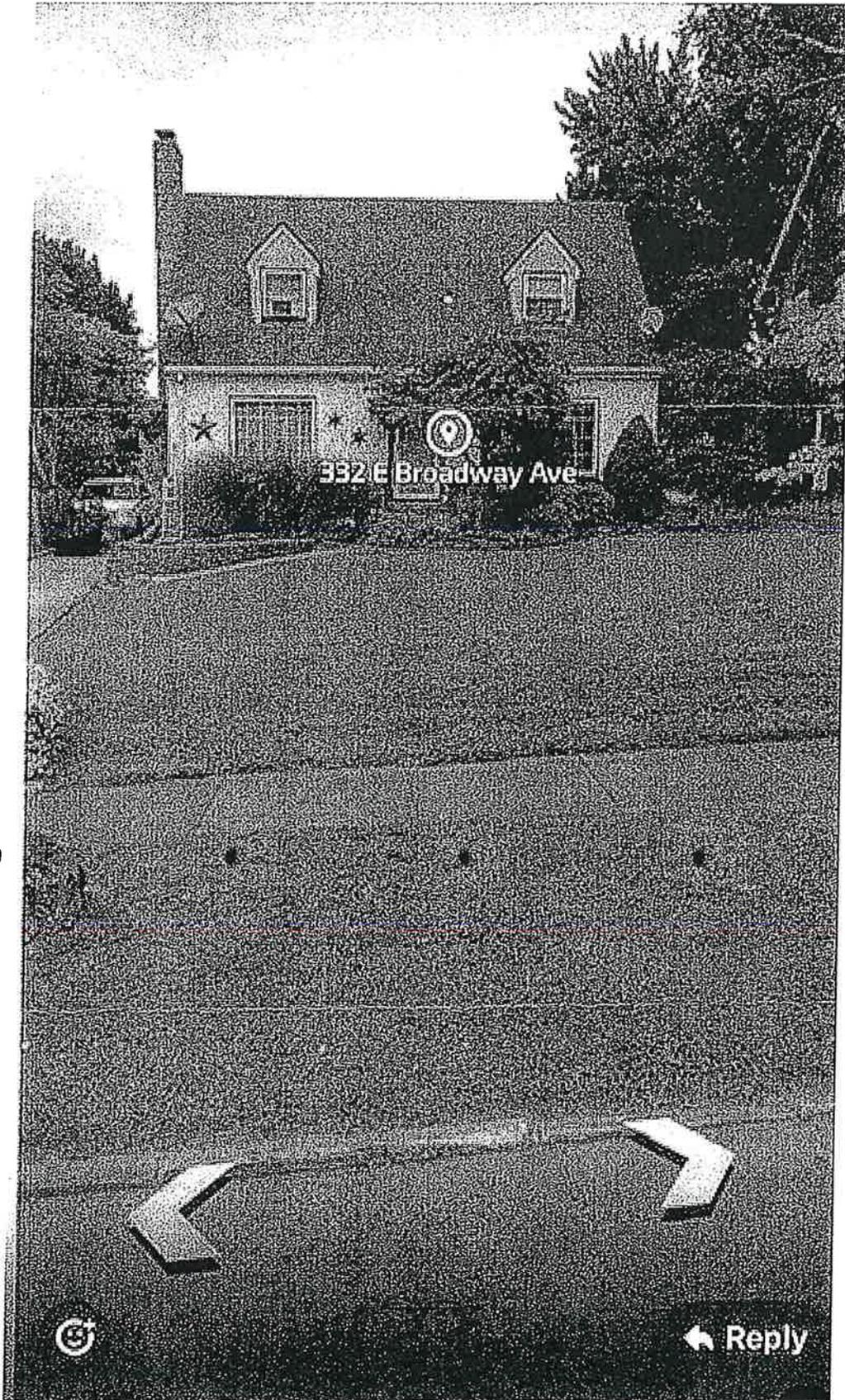
Mobile

Date Reported:

04/28/2020



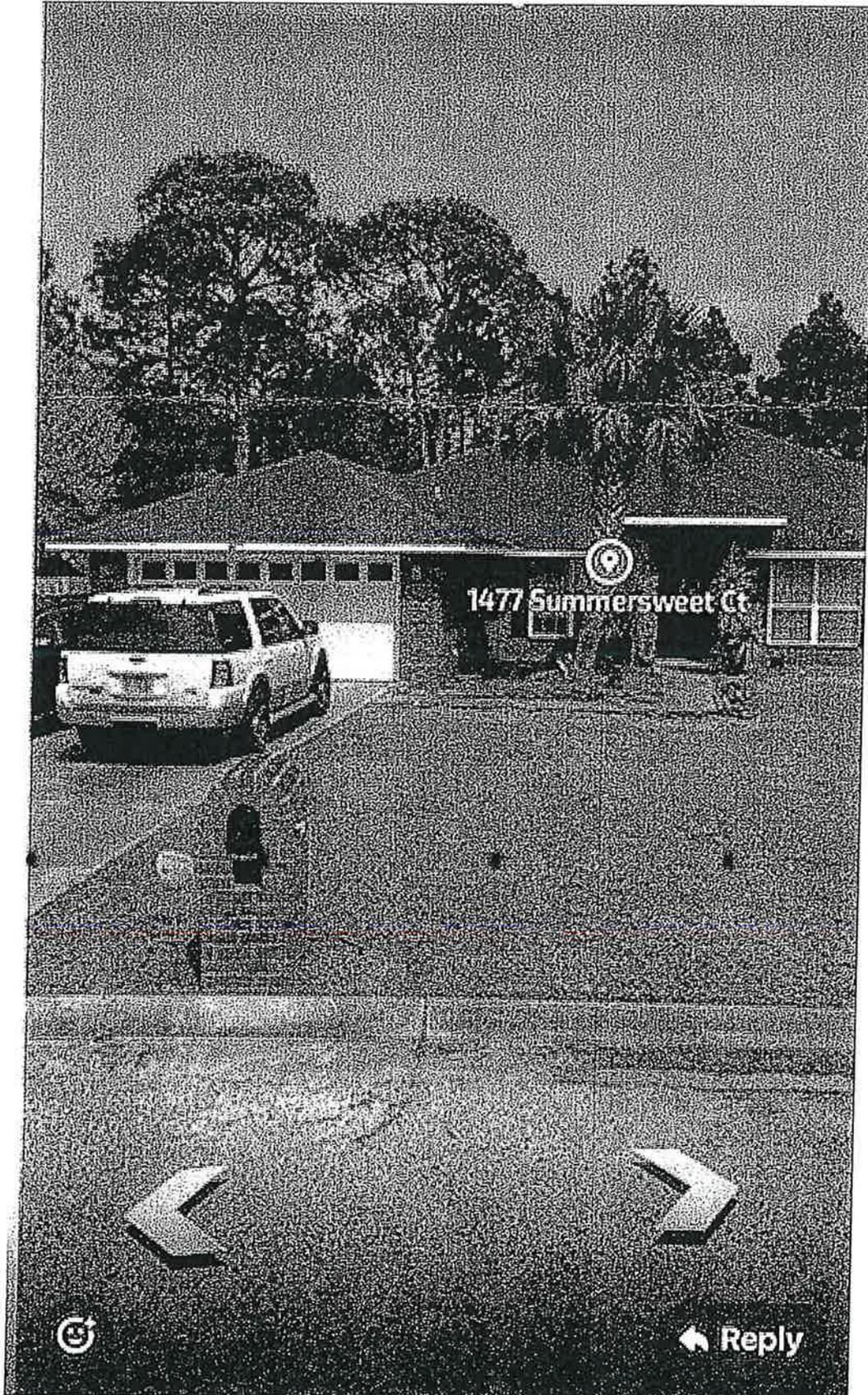
MA Criminal & Traffic Offenses



332 E Broadway Ave



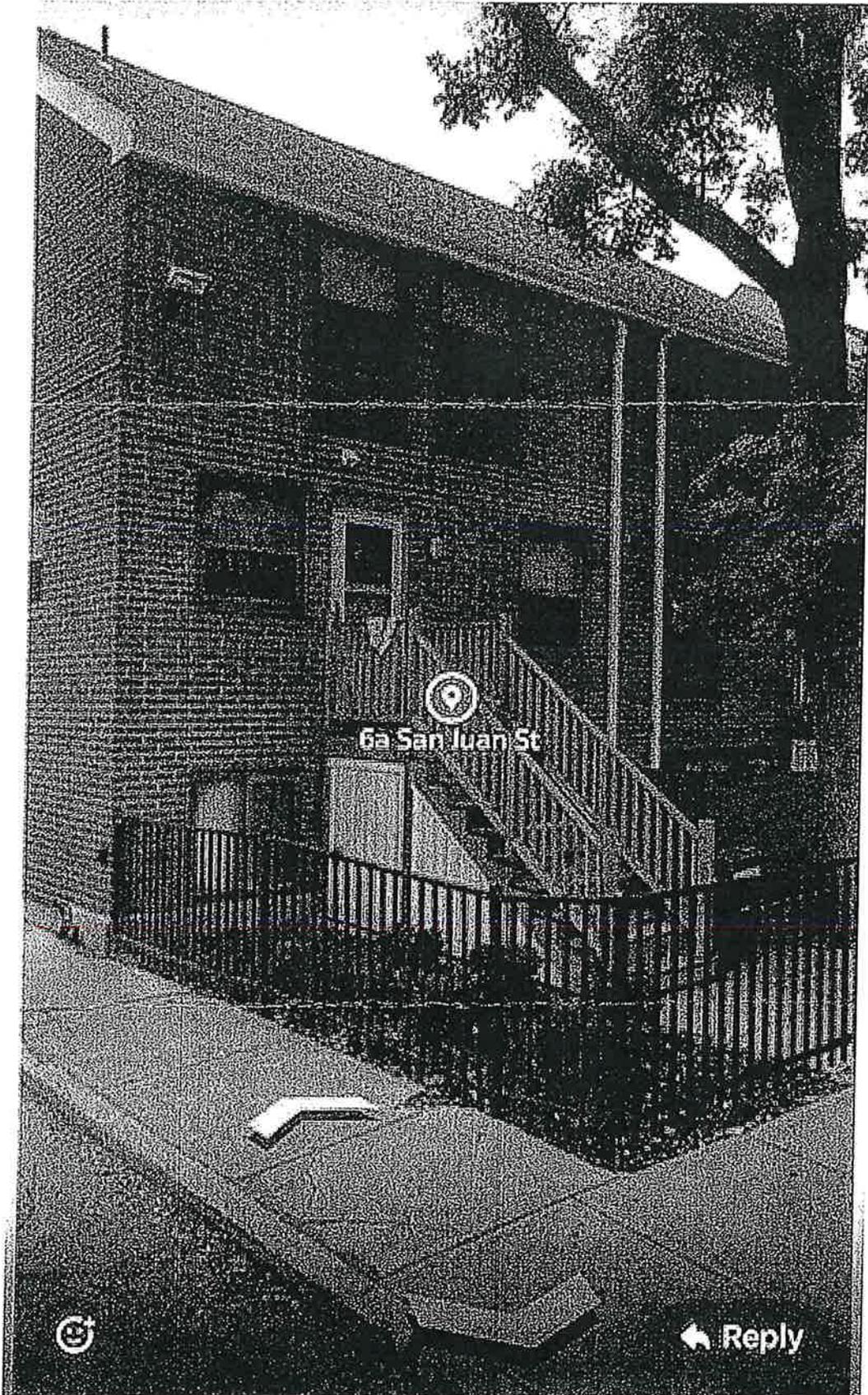
Reply



1477 Summersweet Ct



Reply



← Reply

**SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001**

June 20, 2025

Yasir Qahtan Saud
#53668509
FCI Oakdale II
PO Box 5010
Oakdale, LA 71463

RE: Yasir Qahtan Saud v. United States
USCA4 No. 24-6712

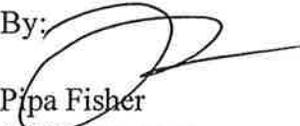
Dear Mr. Saud:

The application for an extension of time within which to file a petition for a writ of certiorari in the above-entitled case was postmarked June 13, 2025 and received June 20, 2025. The application is returned for the following reason(s):

The application is out-of-time. The date of the lower court judgment or order denying a timely petition for rehearing was March 3, 2025. Therefore the application for an extension of time was due on or before June 1, 2025. Rules 13.1, 30.1 and 30.2. When the time to file a petition for a writ of certiorari in a civil case has expired (including any habeas action), the Court no longer has the power to review the petition or to consider an application for an extension of time to file the petition.

Sincerely,
Scott S. Harris, Clerk

By:


Pipa Fisher
(202) 479-3019

Enclosures

**SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001**

July 14, 2025

Yasir Qahtan Saud
#53668509
FCI Oakdale II
PO Box 5010
Oakdale, LA 71463

RE: Yasir Qahtan Saud v. United States/USCA4 No. 24-6712
"Motion for Leave to File a Belated Petition..."

Dear Mr. Saud:

The above-entitled motion was postmarked on June 27, 2025 and received on July 7, 2025.

Your motion to file a motion for leave to file a belated petition for a writ of certiorari is herewith returned. To the extent in which you are filing a motion to direct the Clerk to file an out of time petition, the motion must clearly reflect that language and the petition must be attached to the motion.

Sincerely,
Scott S. Harris, Clerk
By: 
Pipa Fisher
(202) 479-3019

Enclosures



BP-A0288
INCIDENT REPORT
 Dept. of Justice / Federal Bureau of Prisons

Part I - Incident Report

1. Institution: OAKDALE II FCI		Incident Report Number: 4103956	
2. Inmate's Name SAUD, YASIR	3. Register Number 53668-509	4. Date of Incident 04-19-2025	5. Time 1900 hrs
6. Place of Incident Alexandria Unit B Cell 20	7. Assignment ORD REC	8. Unit 1 GP	
9. Incident 108 -- POSSESSING A HAZARDOUS TOOL.		10. Prohibited Act Code(s) 108	

11. Description Of Incident

(Date: 04-19-2025 Time: 1900 hrs staff became aware of incident)

On 04/19/2025 I D. Maxey was assigned to Alexandria Unit B. At approximately 1900 I was making an irregular round when I observed inmate Yasir Saud #53668-509 sitting on the bottom bunk of cell 20 with a cellular device in his hand. When I proceeded to open the cell door inmate Saud #53668-509 conceal the device in the backside of his waistband of his shorts. After giving him multiple orders to hand over the cellular device inmate Saud #53668-509 finally complied. I immediately confiscated the device which was a blue Motorola IMEI#358390902299406 and SIMS#89012803321197414277 AT&T Prepaid Nano 6470C. Operations Lieutenant was notified of my findings and inmate Yasir Saud #53668-509 was escorted to Special Housing Unit.

12. Typed Name/Signature of Reporting Employee D. Maxey		13. Date And Time 04-19-2025 1940 hrs	
14. Incident Report Delivered to Above Inmate By (Type Name/Signature) Gray	15. Date Report Delivered 04-19-2025	16. Time Report Delivered 1946 hrs	

The Government Paperwork Elimination Act (GPEA) of 1998 authorized Federal Agencies the use of electronic forms, electronic filing, and electronic signatures to conduct office business.



BP-A0304

DISCIPLINE HEARING OFFICER REPORT

IR#: 4103956

Reg#: 53668-509

Dept. of Justice / Federal Bureau of Prisons

SAUD, YASIR

be held responsible for his actions/behavior at all times.

VI. SANCTION OR ACTION TAKEN

108 (FREQ 1)-DIS GCT 41 DAYS, 108 (FREQ 1)-DS 10 DAYS, 108 (FREQ 1)-LP COMM 90 DAYS, 108 (FREQ 1)-LP PHONE 180 DAYS, 108 (FREQ 1)-LP TABLET 180 DAYS

When imposing a sanction of Disciplinary Segregation (DS), The Discipline Hearing Officer considered the time served as a primary means when calculating your sanction of (DS). This may not always be a viable option, due to concerns related to the safety of staff, safety of inmates or safety and security of the institution.

VII. REASON FOR SANCTION OR ACTION TAKEN

The sanction against Good Conduct Time was used to comply with the mandatory sanctioning guidelines for inmates sentenced under the Prison Litigation Reform Act (PLRA).

Behavior of this nature is considered disruptive to the safety, security, and orderly operation of the institution. Therefore, the inmate was sanctioned to disciplinary segregation to ensure the safety of all inmates and staff within the institution.

Loss of privileges was imposed to correct the present inappropriate behavior and deter the inmate and others from future behavior of this type.

VIII. APPEAL RIGHTS: X The inmate has been advised of the findings, specific evidence relied on, action and reasons for the action. The inmate has been advised of his right to appeal this action within 20 calendar days under the Administrative Remedy Procedure. A copy of this report has been given to the inmate.

IX. Discipline Hearing Officer

Printed Name	Signature	Date
A THOMAS	A THOMAS	05-28-2025

DHO Report Delivered to Inmate by:

A THOMAS	A THOMAS	5/30/25 14:00
Printed Name of Staff	Signature of Staff	Date & Time Delivered

The Government Paperwork Elimination Act (GPEA) of 1998 authorized Federal Agencies the use of electronic forms, electronic filing, and electronic signatures to conduct office business.

David Jones

204-218

FILED: March 11, 2025

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-6712
(4:21-cr-00041-RAJ-RJK-1)

UNITED STATES OF AMERICA

Plaintiff - Appellee

v.

YASIR QAHTAN SAUD

Defendant - Appellant

M A N D A T E

The judgment of this court, entered December 23, 2024, takes effect today.

This constitutes the formal mandate of this court issued pursuant to Rule
41(a) of the Federal Rules of Appellate Procedure.

/s/Nwamaka Anowi, Clerk

BP-9

BP-148
JUNE 10

INMATE REQUEST TO STAFF CDFRM

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

TO: (Name and Title of Staff Member) <i>Felipe Martinez, Warden, FCI 2</i>	DATE: <i>5/19/2025</i>
FROM: <i>Yasir Saad</i>	REGISTER NO.: <i>53668509</i>
WORK ASSIGNMENT: <i>N/A</i>	UNIT: <i>SHU 116</i>

SUBJECT: (Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary. Your failure to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully respond to your request. Consider This Form AS Grievance Form BP-9, sense the staff refuse to give me

BP-8

I would like to bring to your attention that I have a supreme court Petition need to be done as soon as possible, AND I have informed the LT. in 3 cop-outs but no response to this day. Moreover I can't work any legle work from the shu, I don't have mial slips no copies no legal doc which I made if you requests wit nothing, so please either they'ckit me out of the shu or help me to work on my legal staff from the shu. Also the Dho did not send me any dx sense the 19th of April And send few letters to them including in Appeal doc. No response yet Also no one from my unit time come to see me sense I have been ever here

Thank you

(Do not write below this line)

DISPOSITION:

Signature Staff Member	Date
------------------------	------

Record Copy - File; Copy - Inmate

PDF

Prescribed by P5511

This form replaces BP-148.070 dated Oct 86 and BP-S148.070 APR 94

TO: (Name and Title of Staff Member) SHU LT. or Supervisor	DATE: 5/12/2025
FROM: Yasir Saud	REGISTER NO.: 53668509
WORK ASSIGNMENT: NA	UNIT: 123

SUBJECT: (Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary. Your failure to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully respond to your request.)

Please I need your help because nobody respond to my requests, I have a Supreme court Petition and 60(b) motion needs to be done as soon as possible, and I can't do anything from the SHU I finished my Dho time on May 8th 2025, and I still in the SHU to this date, please kick me out of the SHU or help me to work on my legal Doc. The printer not working, no paper, no access to legal Doc, no law library. Thank you.

(Do not write below this line)

DISPOSITION:

Signature Staff Member	Date
------------------------	------

Record Copy - File; Copy - Inmate
(This form may be replicated via WP)

This form replaces BP-148.070 dated Oct 86
and BP-S148.070 APR 94

FCI Oakdale II

From Yaisir Saud

Reg# 53668509

5/22/2025

To MR. Pate

Assistant Warden.

Please Consider this Letter As my second Grievance

MR. Pate,

I have Advised you that I have A Supreme Court Petition And 60(b) Motion, And I Recieved No Response From you yet Or any Action were taking, Also I have sent Grievance forms To the Warden, Shu Lt, Unit team, And to you. None of you Response to me, so I would Like to bring my Issue to your Attention Again And I Hope you will ~~find a~~ Find A Sultion, I have Finish My Dho time on the 8 of May And All What I heard is you are in the kick out List which I have Informed the Shu Lt, and the staff that I have a Supreme Court Petition but still Nothing And I see Inmates Leaving the Shu but when it comes to me there is No bed open this is Unusual Punishment and Crual, Moreover the Dho don't Respd to the Letter I sent Or to the Appeal Doc so please I Need you help.

TRULINCS 53668509 - SAUD, YASIR QAHTAN - Unit: OAD-A-B

FROM: 53668509

TO: Trust Fund

SUBJECT: ***Request to Staff*** SAUD, YASIR, Reg# 53668509, OAD-A-B

DATE: 06/16/2025 09:16:49 AM

To: SUPERVISOR

Inmate Work Assignment: NA

GOOD MORNING,

I WOULD LIKE TO BRING TO YOUR ATTENTION THAT BOTH PRINTERS ARE OUT OF SERVICE IN EDUCATION DEP. AND I HAVE A SUPREME COURT PETITION I NEED TO FINISHED AS SOON AS POSSIBLE.

THANK YOU

TRULINCS 53668509 - SAUD, YASIR QAHTAN - Unit: OAD-A-B

FROM: 53668509

TO: Education

SUBJECT: ***Request to Staff*** SAUD, YASIR, Reg# 53668509, OAD-A-B

DATE: 06/16/2025 09:13:43 AM

To: EDUCATION SUPERVISOR

Inmate Work Assignment: NA

GOOD MORNING,

I WOULD LIKE TO BRING TO YOUR ATTENTION THAT BOTH PRINTER IS OUT OF SERVICE, AND THIS WILL DELIDE ME FROM WORKING ON MY LEGALE PAPER AND I HAVE A SUPREME COURT PETITION NEED TO BE DONE AS SOON AS POSSIBLE, PLEASE REPORT THE PROBLEM TO TRUSTFUNDS AS I JUST DID.

THANK YOU

TRULINCS 53668509 - SAUD, YASIR QAHTAN - Unit: OAD-A-B

FROM: 53668509

TO: Trust Fund

SUBJECT: ***Request to Staff*** SAUD, YASIR, Reg# 53668509, OAD-A-B

DATE: 07/10/2025 07:41:32 PM

To: trust fund officer

Inmate Work Assignment: na

Please do you know when is commissary will be open I have legal documents needs to be sent to the court and i need envelops and a copier card.

thank you