

SDD:SPN
F.#2014R00158

IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ NOV 26 2014 ★
BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -



Cr. No. _____
(T. 18, U.S.C., §§
2339B(a)(1),
2339B(d), 2339D(a),
2339D(b), 2 and
3551 et seq.)



Defendant.

- - - - - X

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE


(Providing Material Support to a Foreign
Terrorist Organization)

1. In or about and between May 2014 and November 2014,
both dates being approximate and inclusive, within the Eastern
District of New York and elsewhere, the defendant 
 together with others, did knowingly and
intentionally provide material support and resources, as defined in
18 U.S.C. § 2339A(b), including services and personnel, including
himself, to a foreign terrorist organization, to wit: the Islamic
State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339B(a)(1),
2339B(d), 2 and 3551 et seq.)

COUNT TWO

(Receipt of Military-Type Training from a Foreign Terrorist Organization)

2. In or about and between June 2014 and November 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant  together with others, did knowingly and intentionally receive military-type training from and on behalf of a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339D(a), 2339D(b), 2 and 3551 et seq.)


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK