

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

INDICTMENT

- v. - :

19 Cr. ____ (____)

KIM ANH VO, :

19 CRIM 223

a/k/a "F@ng," :

a/k/a "SyxxZMC," :

a/k/a "Zozo," :

a/k/a "Miss.Bones," :

a/k/a "Sage Pi," :

a/k/a "Kitty Lee," :

Defendant. :

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED MAR 27 2019

COUNT ONE

**(Conspiracy to Provide Material Support to a
Designated Foreign Terrorist Organization)**

The Grand Jury charges:

1. From at least in or about April 2016, up to and including in or about May 2017, in the Southern District of New York and elsewhere, KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to knowingly provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham

JUDGE BUCHWALD

("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Indictment.

2. It was a part and an object of the conspiracy that KIM ANH VO, a/k/a "Feng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and others known and unknown, would and did knowingly provide ISIS with "material support or resources," including, among other things, tangible and intangible property, service, training, expert advice and assistance, false documentation and identification, communications equipment, facilities, and personnel, knowing that ISIS was a designated terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B, to wit, VO participated in and recruited others to join an online hacking group that pledged its allegiance to ISIS, disseminated ISIS propaganda online, and unlawfully accessed and stole from

private and governmental computer systems victims' personally identifiable information, all in support of ISIS's mission.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and her co-conspirators committed the overt acts set forth below, among others:

a. In or about April 2016, VO joined an online group knowing that the online group's members had pledged allegiance to ISIS and committed to carrying out online attacks and cyber intrusions against Americans.

b. Between in or about January and February 2017, VO recruited other individuals to create online content in support of ISIS.

c. On or about March 3, 2017, a co-conspirator not named as a defendant herein ("CC-4") posted a link online to a video threatening a non-profit organization based in Manhattan, New York.

d. On or about April 2, 2017, a co-conspirator not named as a defendant herein ("CC-7") posted publicly online a video publicizing the upcoming release of a "kill list" of more than 8,000 people on behalf of ISIS, including several who

lived in Manhattan, New York, and a direction to ISIS supporters to "[k]ill them wherever you find them."

(Title 18, United States Code, Section 2339B.)

FORFEITURE ALLEGATION

4. As a result of planning and perpetrating a Federal crime of terrorism against the United States, as defined in Title 18, United States Code, Section 2332b(g)(5), as alleged in Count One of this Indictment, KIM ANH VO, a/k/a "Feng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offense; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offense; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the total amount of the defendant's assets.

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Substitute Assets Provision


5. If any of the above-described forfeitable property, as a result of any act or omission of KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of VO up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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INDICTMENT

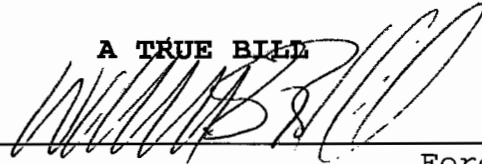
19 Cr. ____ (___)

(18 U.S.C. § 2339B.)

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL



Foreperson

3-27-19 Deft pres with attorney Sabrina Shroff, A.U.S.A.
Shawn Crowley pres. Deft. Arraigned + Plead
Not Guilty. Case assigned to Judge Buchwald.
Deft. Detained.

Parker (CA)
U.S.M.J

03/27/19 INDICTMENT FILED

(CA)

WHEEL B - JUDGE BUCHWALD
KIM PARKER
USMJ