

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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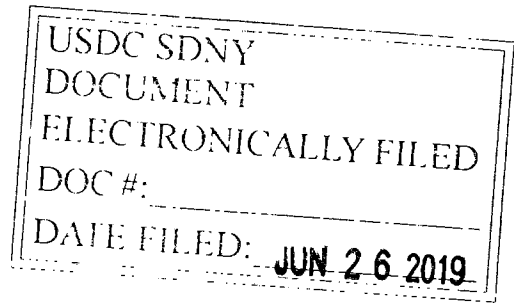
UNITED STATES OF AMERICA : SUPERSEDING INFORMATION

- v. - : S1 19 Cr. 223 (NRB)

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," :

Defendant. :

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COUNT ONE

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

The United States Attorney 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, knowingly and intentionally 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

("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 Superseding Information.

2. It was a part and an object of the conspiracy that 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, 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).

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 371.)


GEOFFREY S. BERMAN
United States Attorney

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(18 U.S.C. § 371.)

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United States Attorney.