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U.S. ATTORNEY'S
CLEVELAND, OH

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMIR SAID RAHMAN AL-GHAZI,
aka "Robert C. McCollum,"

Defendant.

) INDICTMENT

) **1 : 15 CR 268**

) CASE NO. _____

) Title 18, United States Code,
) Sections 2339B(a)(1) and 922(g)(1),
) Title 21, United States Code,
) Sections 841(a)(1) and (b)(1)(D)

JUDGE LIOI

COUNT 1

The Grand Jury charges:

From in or around June 2014 through on or about June 19, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," a citizen of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), including services, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant, which had been continuously designated by the Secretary of State as a foreign terrorist organization since on or about October 15, 2004, knowing that the organization was a designated terrorist organization and that the organization had engaged in and was engaging in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2

The Grand Jury further charges:

On or about June 19, 2015, in the Northern District of Ohio, Eastern Division, AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, that is, Drug Abuse (F4), in Case Number CR-96-339383, in the Cuyahoga County Common Pleas Court, on or about November 20, 1996; Having Weapons While Under Disability (F3), in Case Number CR-05-474264-B, in the Cuyahoga County Common Pleas Court, on or about June 13, 2006; Attempted Having Weapons Under Disability (F4), in Case Number CR-09-527760-A, in the Cuyahoga County Common Pleas Court, on or about July 22, 2010; Trafficking Offenses (F4), Having Weapons While Under Disability (F4), and Trafficking Offenses (F3), in Case Number CR-09-532061-B, in the Cuyahoga County Common Pleas Court, on or about July 22, 2010; and Trafficking Offenses (F4), in Case Number CR-10-537372-A, in the Cuyahoga County Common Pleas Court, on or about July 22, 2010, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: an AK-47, 7.62 x 39 mm rifle, serial number ending in 5416L.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 3

The Grand Jury further charges:

On or about June 19, 2015, in the Northern District of Ohio, Eastern Division, AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, that is, Drug Abuse (F4), in Case Number CR-96-339383, in the Cuyahoga County Common Pleas Court, on or about

November 20, 1996; Having Weapons While Under Disability (F3), in Case Number CR-05-474264-B, in the Cuyahoga County Common Pleas Court, on or about June 13, 2006; Attempted Having Weapons Under Disability (F4), in Case Number CR-09-527760-A, in the Cuyahoga County Common Pleas Court, on or about July 22, 2010; Trafficking Offenses (F4), Having Weapons While Under Disability (F4), and Trafficking Offenses (F3), in Case Number CR-09-532061-B, in the Cuyahoga County Common Pleas Court, on or about July 22, 2010; and Trafficking Offenses (F4), in Case Number CR-10-537372-A, in the Cuyahoga County Common Pleas Court, on or about July 22, 2010, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Taurus, .45 caliber handgun, Model PT 24/7 PRO DS, serial number NDM25686.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNTS 4 - 27

The Grand Jury further charges:

On or about the dates listed below, in the Northern District of Ohio, Eastern Division, AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," did knowingly and intentionally distribute the approximate amounts listed below of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D):

COUNT	DATE	APPROXIMATE AMOUNT OF MARIJUANA
4	February 17, 2014	95.1 grams
5	February 24, 2014	78.8 grams

COUNT	DATE	APPROXIMATE AMOUNT OF MARIJUANA
6	March 6, 2014	122 grams
7	March 20, 2014	78.8 grams
8	May 21, 2014	87 grams
9	September 10, 2014	93 grams
10	September 18, 2014	86.6 grams
11	October 23, 2014	76 grams
12	November 6, 2014	59.3 grams
13	November 25, 2014	88 grams
14	January 29, 2015	60.55 grams
15	February 5, 2015	59.03 grams
16	February 12, 2015	60.26 grams
17	March 3, 2015	87.4 grams
18	March 16, 2015	87.9 grams
19	March 26, 2015	86.7 grams
20	April 2, 2015	86.1 grams
21	April 16, 2015	84.4 grams
22	May 7, 2015	86.8 grams

COUNT	DATE	APPROXIMATE AMOUNT OF MARIJUANA
23	May 14, 2015	84.5 grams
24	May 29, 2015	57.72 grams
25	June 4, 2015	77.34 grams
26	June 12, 2015	85.04 grams
27	June 18, 2015	86.75 grams

COUNT 28

The Grand Jury further charges:

On or about June 19, 2015, in the Northern District of Ohio, Eastern Division, AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," did knowingly and intentionally possess with intent to distribute approximately 98.2 grams of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), the allegations of Counts 2 through 28 are incorporated herein by reference. As a result of the foregoing offenses, Defendant AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; any and all of his property used or intended to be used, in any manner or part, to

commit or to facilitate the commission of such violations; and, any and all property (including firearms and ammunition) involved in or used in the commission of such violations; including, but not limited to, the following: Taurus, .45 caliber handgun, Model PT 24/7 PRO DS, serial number NDM25686.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts pursuant to the E-Government Act of 2002.

United States v. Amir Said Rahman Al-Ghazi, aka "Robert C. McCollum"

A TRUE BILL.

FOREPERSON

STEVEN M. DETTELBACH
United States Attorney