

FILED


UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

2014 JUN 18 PM 3:52

UNITED STATES OF AMERICA,

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Cause No.:

CLERK OF DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  CLERK

v.

INDICTMENT

Michael Todd Wolfe, a/k/a, "Faruq."

[Count 1: Attempt to Provide Material Support to Terrorists, 18 U.S.C § 2339A.]

**A14 CR0213 SS**

**THE GRAND JURY CHARGES:**

COUNT ONE

**Attempt to Provide Material Support to Terrorists  
[18 U.S.C. § 2339A]**

Beginning in or before August 2013, to the present, in the Western District of Texas and elsewhere, the Defendant,


**Michael Todd Wolfe, a/k/a, "Faruq,"**

knowingly attempted to provide material support and resources, as that term is defined in Title 18, United States Code, § 2339A(b)(1), including services and personnel, to include himself, knowing and intending that they were to be used in preparation for, and in carrying out the violation of Title 18, United States Code, § 956(a)(1) and (2) (conspiracy to commit at a place outside the United States an act that would constitute the offense of murder, kidnapping, or maiming, if committed in the special maritime and territorial jurisdiction of the United States, where one of the conspirators committed an act within the jurisdiction of the United States to effect an object of the conspiracy), in violation of Title 18, United States Code, § 2339A.

A TRUE BILL.

ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

ROBERT PITMAN  
United States Attorney

By:   
GREGG N. SOFER  
Assistant United States Attorney