

FILED
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2017 SEP 26 PM 4:17

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

SDD:CRH/ML
F.# 2017R01183

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

PARVEG AHMED,

Defendant.

-----X

THE GRAND JURY CHARGES:

INDICTMENT

CR 17

378

Cr. No. _____
(T. 18, U.S.C., §§ 981(a)(1)(G),
2339(B)(a)(1), 2339B(d), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

DONNELLY, J.

SCANLON, M.J.

ATTEMPT TO PROVIDE MATERIAL SUPPORT TO
A DESIGNATED FOREIGN TERRORIST ORGANIZATION

1. In or about and between October 2014 and June 2017, both dates being approximate and inclusive, within the Eastern District of New York and within the extraterritorial jurisdiction of the United States, the defendant PARVEG AHMED, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, including AHMED himself, to a foreign terrorist organization, to wit: the Islamic State of Iraq and al-Sham ("ISIS"), which, at all times relevant to this Indictment, has been designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated terrorist organization and the organization had engaged in and was engaging in terrorist

activity and terrorism, and the defendant was a national of the United States (as defined in section 101(a)(20) of the Immigration and Nationality Act), the offense occurred in part within the United States, the offense occurred in and affected interstate and foreign commerce and, after the conduct required for this offense occurred, the defendant was brought into or found in the United States.

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

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant PARVEG AHMED that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 981(a)(G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of all assets, foreign or domestic: (a) of any individual, entity or organization engaged in planning or perpetrating any Federal crime of terrorism (as defined in Title 18, United States Code, Section 2332b(g)(5)) against the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization; (b) acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting or concealing any Federal crime of terrorism (as defined in Title 18, United States Code, Section 2332b(g)(5)) against the United States, citizens or residents of the United States, or their property; (c) derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism (as defined in Title 18, United States Code, Section 2332b(g)(5)) against the United States, citizens or

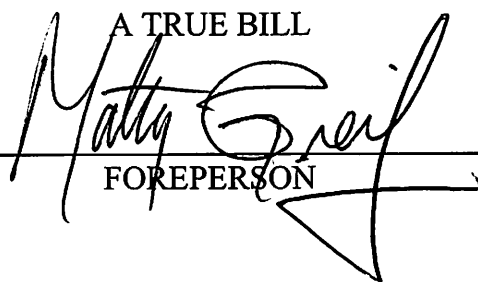
residents of the United States, or their property; or (d) of any individual, entity or organization engaged in planning or perpetrating any act of international terrorism (as defined in Title 18, United States Code, Section 2331) against any international organization (as defined in Title 22, United States Code, Section 4309(b)) or against any foreign Government.


3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

FOREPERSON


BRIDGE P.M. ROHDE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2017R01183
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

PARVEG AHMED,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(G), 2339(B)(a)(1), 2339B(d), 2 and 3551
et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Craig R. Heeren and Margaret Lee
Assistant U.S. Attorneys (718) 254-6467/6205