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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

2819 JUL -9 PM 4: 30

PUTY CLERKS. W

UNITED STATES OF AMERICA

v.

OMER KUZU

319 - CR - 327 - M

No

TO BE FILED UNDER SEAL

INDICTMENT

The Grand Jury Charges:

Count One

Conspiring to Provide Material Support to a Designated Foreign Terrorist Organization (Violation of 18 U.S.C. § 2339B)

Beginning in or about April 2011 and continuing to the date of this indictment, within the Northern District of Texas, and elsewhere, the defendant, **Omer Kuzu**, a citizen of the United States, did knowingly conspire, with persons known and unknown to the grand jury, to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit personnel, including himself, to a foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham (ISIS), which at all relevant times was 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 foreign terrorist organization and knowing that the organization had engaged in, and engages in, terrorist activity and terrorism, all in violation of Title 18, United States Code, Section 2339B(a)(1).

A TRUE BILL

FOREPERSON

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