

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ SEP 10 2018 ★

BROOKLYN OFFICE

RMT:CRH/ML
F.# 2017R01712

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

RASHEEDUL MOWLA,

Defendant.

-----X

INDICTMENT

CR 18 - 00487

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

GLASSER, J.

THE GRAND JURY CHARGES:

REYES, M.J.

COUNT ONE

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

1. In or about and between November 2016 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 RASHEEDUL MOWLA, together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, including MOWLA himself and others, to a foreign terrorist organization, to wit: the Islamic State of Iraq and al-Sham ("ISIS"), which, at all times relevant to this Indictment, had 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 that the organization had engaged in and was engaging

in terrorist activity and terrorism, the defendant being a national of the United States (as defined in Section 101(a)(22) of the Immigration and Nationality Act), who did conspire with a person over whom jurisdiction exists under Title 18, United States Code, Section 2339B, and who, after the conduct required for this offense occurred, was brought to and found in the United States, and the offense occurred in part within the United States and occurred in and affected interstate and foreign commerce.

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

COUNT TWO

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

2. In or about and between May 2017 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 RASHEEDUL MOWLA, 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 MOWLA himself and others, to a foreign terrorist organization, to wit: ISIS, which, at all times relevant to this Indictment, had 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 that the organization had engaged in and was engaging in terrorist activity and terrorism, the defendant being a national of the United States (as defined in Section 101(a)(22) of the Immigration and Nationality Act), who, after the conduct required for this offense occurred,

was first brought to and found in the United States, and the offense occurred in part within the United States and occurred in and affected interstate and foreign commerce.

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

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c)(1), 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.

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

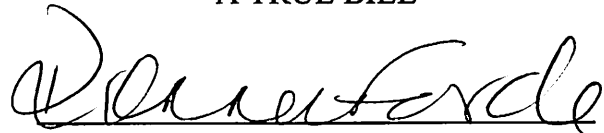
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

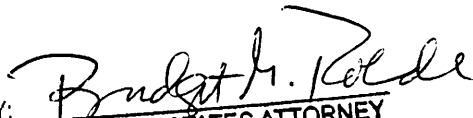
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

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

A TRUE BILL


FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

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.

RASHEEDUL MOWLA,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(G), 2339B(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
Assistant U.S. Attorney (718) 254-6467

CR 18 - 00487

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US DISTRICT COURT E.D.N.Y.

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INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

- 1. Title of Case: United States v. Rasheedul Mowla
- 2. Related Magistrate Docket Number(s): 17-MJ-769
- 3. Arrest Date: 8/29/2017 **GLASSER, J.**
- 4. Nature of offense(s): Felony **REYES, M.J.**
 Misdemeanor
- 5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): United States v. Ahmed, 17-CR-378 (AMD)
- 6. Projected Length of Trial: Less than 6 weeks
More than 6 weeks
- 7. County in which crime was allegedly committed: Brooklyn and Queens
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
- 8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.¹ Yes No
- 9. Has this indictment/information been ordered sealed? Yes No
- 10. Have arrest warrants been ordered? Yes No
- 11. Is there a capital count included in the indictment? Yes No

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
Assistant U.S. Attorney
(718) 254-6467

¹ Judge Brodie will not accept cases that were initiated before March 10, 2012.