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F.#2014R01413

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

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UNITED STATES OF AMERICA

SUPERSEDING
INDICTMENT

- against -

Cr. No. 15-95 (S-3)(WFK)
(T. 18, U.S.C., §§ 924(o), 1546(a),
2339B(a)(1), 2 and 3551 et seq.)

AKHROR SAIDAKHMETOV,
ABROR HABIBOV,
AZIZJON RAKHMATOV,
 also known as "Abdulaziz"
 and "Abdul Azizz,"
AKMAL ZAKIROV and
DILKHAYOT KASIMOV,

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Provide Material Support to
a Foreign Terrorist Organization)

1. In or about and between August 2014 and February 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants AKHROR SAIDAKHMETOV, ABROR HABIBOV, AZIZJON RAKHMATOV, also known as "Abdulaziz" and "Abdul Azizz," AKMAL ZAKIROV and DILKHAYOT KASIMOV, 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

services and SAIDAKHMETOV and Abdurasul Juraboev as personnel, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

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

COUNT TWO

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

2. In or about and between August 2014 and February 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants AKHROR SAIDAKHMETOV, ABROR HABIBOV, AZIZJON RAKHMATOV, also known as “Abdulaziz” and “Abdul Azizz,” AKMAL ZAKIROV and DILKHAYOT KASIMOV, 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 services and SAIDAKHMETOV and Abdurasul Juraboev as personnel, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

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

COUNT THREE

(Conspiracy to Use a Firearm)

3. In or about and between January 2015 and February 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants AKHROR SAIDAKHMETOV, ABROR HABIBOV and AZIZJON RAKHMATOV, also known as “Abdulaziz” and “Abdul Azizz,” together with others, did knowingly and intentionally conspire to use and carry a firearm during and in relation to one or

more crimes of violence, to wit: the crimes charged in Counts One and Two, contrary to Title 18, United States Code, Section 924(c).

(Title 18, United States Code, Sections 924(o) and 3551 et seq.)

COUNT FOUR
(Travel Document Fraud)

4. In or about and between January 2015 and February 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant AKHROR SAIDAKHMETOV, together with others, did knowingly and intentionally make under oath, and knowingly subscribe as true under penalty of perjury under Section 1746 of Title 28, United States Code, one or more false statements with respect to one or more material facts to facilitate an act of international terrorism, to wit:

(a) that SAIDAKHMETOV intended to travel to Turkey, Uzbekistan and Kazakhstan, when in fact, as SAIDAKHMETOV then and there well knew and believed, he intended to travel to Syria; and

(b) that the purpose of SAIDAKHMETOV's travel was "travel" and "entertainment," when in fact, as SAIDAKHMETOV then and there well knew and believed, the purpose of his travel was to join the Islamic State of Iraq and the Levant;

in an application required by the immigration laws and regulations prescribed thereunder, to wit: a Form I-131 Application for Travel Document, and did knowingly and intentionally present such application, which contained such false statements.

(Title 18, United States Code, Sections 1546(a), 2 and 3551 et seq.)

A TRUE BILL



A handwritten signature in black ink, appearing to read 'R. Capers', is written over a horizontal line.

ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK