

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                          |   |                                    |
|--------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA | ) | No. 14 CR 564                      |
|                          | ) |                                    |
|                          | ) | Violation: Title 18, United States |
| v.                       | ) | Code, Section 2339B(a)(1)          |
|                          | ) |                                    |
| MOHAMMED HAMZAH KHAN     | ) | <u>INDICTMENT</u>                  |

The SPECIAL FEBRUARY 2014 GRAND JURY charges:

1. At times material to this indictment:

a. On or about October 15, 2004, the United States Secretary of State designated al-Qaida in Iraq as a foreign terrorist organization.

b. On or about May 15, 2014, the Secretary of State amended that designation to add the alias the Islamic State of Iraq and the Levant as al-Qaida in Iraq's primary name. The Secretary also added the following aliases to the listing: the Islamic State of Iraq and al-Sham, the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production.

2. Beginning no later than in or about February 2014, and continuing until at least on or about October 4, 2014, at Chicago, in the Northern District of Illinois, and elsewhere,

MOHAMMED HAMZAH KHAN,

defendant herein, knowingly attempted to provide material support and resources, namely, personnel, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant, knowing that it was a designated foreign terrorist organization and that the organization had engaged and was engaging in terrorist activity and terrorism;

In violation of Title 18, United States Code, Section 2339B(a)(1).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY