

SDD:TAD/SPN
F.# 2015R00079

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

TAIROD NATHAN WEBSTER PUGH,
Defendant.

-----X

THE GRAND JURY CHARGES:

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

1. On or about and between May 15, 2014 and January 12, 2015, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant TAIROD NATHAN WEBSTER PUGH did knowingly and intentionally attempt to provide material support and resources, as defined in 18 U.S.C. § 2339A(b), including personnel, including PUGH himself, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

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

FILED
CLERK

2015 MAR 16 PM 3:31

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

INDICTMENT

Cr. No. **CR 15 - 00116**

(T. 18, U.S.C., §§ 981(a)(1)(C) and (G),
1512(c)(1), 1512(c)(2), 2339(B)(a)(1),
2339B(d) and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

GARAUFIS, J.

REYES, M.J

COUNT TWO
(Obstruction and Attempted Obstruction
of an Official Proceeding)

2. On or about and between January 10, 2015 and January 16, 2015, within the Eastern District of New York and elsewhere, the defendant TAIROD NATHAN WEBSTER PUGH did knowingly, intentionally and corruptly: (a) alter, destroy, mutilate and conceal one or more records, documents and objects, to wit: four USB thumb drives bearing the numbers 20071464R5, NMC850160, AR212W and 484R1, and the files and images contained thereon, and attempt to do so, with the intent to impair such items' integrity and availability for use in an official proceeding, to wit: a proceeding before a federal grand jury in the Eastern District of New York relating to the commission and possible commission of one or more terrorism offenses, including the offense charged in Count One (the "Grand Jury Terrorism Investigation"); and (b) obstruct, influence and impede an official proceeding, to wit: the Grand Jury Terrorism Investigation, and attempt to do so.

(Title 18, United States Code, Sections 1512(c)(1), 1512(c)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

3. The United States hereby gives notice to the defendant TAIROD NATHAN WEBSTER PUGH that, upon his conviction of either of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and (G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (a) any property, real or personal, constituting or derived from proceeds traceable to said offenses; and (b) all assets, foreign or domestic: (i) of any

individual, entity or organization engaged in planning or perpetrating any Federal crime of terrorism 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; (ii) acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting or concealing any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; (iii) derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; or (iv) of any individual, entity or organization engaged in planning or perpetrating any act of international terrorism against any international organization or against any foreign Government, including but not limited to the following: (1) one HP Laptop Computer, Serial Number CND424B7YH; (2) one Apple iPod, Serial Number CCQJG45MF4K5; (3) one Samsung Galaxy S4 Mobile Telephone, IMEI Number DEC 256691488101320513; (4) one Pixel Mobile Telephone, IMEI Number 355333053364895; and (5) five USB thumb drives bearing the numbers 20071464R5, NMC850160, AR212W, 484R1 and SDCZ36002GBE1107VQYN, all recovered from the defendant on or about January 11, 2015.

6. 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)(C) and (G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



A handwritten signature in black ink, consisting of a large, stylized initial 'C' followed by a series of loops and a long horizontal stroke extending to the right.

FOREPERSON



A handwritten signature in black ink, reading 'Loretta E. Lynch' in a cursive script.

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2015R00079
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

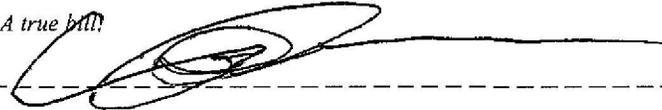
TAIROD NATHAN WEBSTER PUGH,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C) and (G), 1512(c)(1), 1512(c)(2),
2339(B)(a)(1), 2339B(d) 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, \$ _____

Tiana A. Demas, Samuel P. Nitze, Assistant U.S. Attorneys 718-254-6116/6465