



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
12-60298-CR-SCOLA/SNOW
CASE NO. _____

18 U.S.C. § 2339A(a)
18 U.S.C. § 2332a(a)
18 U.S.C. § 2

UNITED STATES OF AMERICA

v.

**RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERYAR ALAM QAZI,**

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1

**Conspiring to Provide Material Support to Terrorists
(18 U.S.C. § 2339A(a))**

Beginning on a date unknown to the Grand Jury, but no later than July 2011, and continuing through November 29, 2012, in the Southern District of Florida and elsewhere, the defendants,

**RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERYAR ALAM QAZI,**

did knowingly combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to property, service, including currency and monetary instruments, lodging, communications equipment, personnel, and

transportation, knowing and intending that they be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 2332a(a), that is, a conspiracy to use a weapon of mass destruction; all in violation of Title 18, United States Code, Sections 2339A(a) and 2.

COUNT 2

**Conspiring to Use a Weapon of Mass Destruction
(18 U.S.C. § 2332a(a))**

Beginning on a date unknown to the Grand Jury, but no later than July 2011, and continuing through November 29, 2012, in the Southern District of Florida and elsewhere, the defendants,

**RAEES ALAM QAZI,
a/k/a “Shan,” and
SHEHERYAR ALAM QAZI,**

did knowingly combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to use, without lawful authority, a weapon of mass destruction, that is, a destructive device, as defined in Title 21, United States Code, Section 921(a)(4), against persons and property within the United States, with a facility of interstate commerce being used in furtherance of the offense, with a defendant traveling in and causing another to travel in interstate commerce in furtherance of the offense, and with the offense and the results of the offense, had they

occurred, affecting interstate commerce, in violation of Title 18, United States Code, Sections 2332a(a) and 2.

A TRUE BILL

~~FOREPERSON~~
FOREPERSON

Wifredo A. Ferrer *FRUSA*
for

WIFREDO A. FERRER
UNITED STATES ATTORNEY

Karen E. Gilbert

KAREN E. GILBERT
ASSISTANT UNITED STATES ATTORNEY