

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW
YORK
BROOKLYN OFFICE

DMP:AL/AAS/ICR/JGH
F. #2017R02031

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

LAFARGE S.A. and
LAFARGE CEMENT SYRIA S.A.,

Defendants.

Cr. No. 22-444 (WFK)
(T. 18, U.S.C., §§ 981(a)(1)(C),
981(a)(1)(G)(i), 981(a)(1)(G)(ii),
981(a)(1)(G)(iii), 2339B(a)(1),
2339B(d), 3571(d) and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

----- X

THE UNITED STATES ATTORNEY CHARGES:

CONSPIRACY TO PROVIDE
MATERIAL SUPPORT TO FOREIGN TERRORIST ORGANIZATIONS

1. In or about and between August 2013 and October 2014, both dates being approximate and inclusive, within the Eastern District of New York and the extraterritorial jurisdiction of the United States, the defendants LAFARGE S.A. and LAFARGE CEMENT SYRIA S.A., 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 currency, to one or more foreign terrorist organizations, to wit: the Islamic State of Iraq and al-Sham (“ISIS”) and the al-Nusrah Front (“ANF”), which at all relevant times had been designated by the Secretary of State as foreign terrorist organizations, knowing that the organizations were designated terrorist organizations and the organizations had engaged in and were engaging in terrorist activity and terrorism, and after the conduct required for this offense occurred, the defendants were brought into and found in the United States, the offense occurred in part within the United States, the offense occurred in and affected interstate and foreign commerce, and the



defendants conspired with a national of the United States (as defined in section 101(a)(22) of the Immigration and Nationality Act).

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d), 3571(d) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged herein, the government will seek forfeiture in accordance with:

(a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offense; and

(b) Title 18, United States Code, Sections 981(a)(1)(G)(i), (ii) and (iii) and Title 28, United States Code, Section 2461(c), which require the forfeiture of all assets, foreign or domestic, (i) 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; (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 (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; (iii) 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 (iv) 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.

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

- (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, Sections 981(a)(1)(C), 981(a)(1)(G)(i), 981(a)(1)(G)(ii) and 981(a)(1)(G)(iii); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))



BREON PEACE /
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2017R02031
FORM DBD-34
JUN. 85

No. 22-CR-444 (WFK)

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

*LAFARGE S.A. and
LAFARGE CEMENT SYRIA S.A.,*

Defendants.

INFORMATION

(T. 18, U.S.C., §§ 981(a)(1)(C), 981(a)(1)(G)(i), 981(a)(1)(G)(ii),
981(a)(1)(G)(iii), 2339B(a)(1), 2339B(d), 3571(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, \$ -----

*Allon Lifshitz, Alexander A. Solomon, Ian C. Richardson, Josh Hafetz
Assistant U.S. Attorneys (718) 254-7000*