JHK:JPL/BWB F# 2010R

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ZAREIN AHMEDZAY,

Defendant.

THE GRAND JURY CHARGES:

MATERIAL FALSE STATEMENTS

- X

On or about and between September 17, 2009 and September 18, 2009, both dates being approximate and inclusive, within the Eastern District of New York, the defendant ZAREIN AHMEDZAY did knowingly and willfully make one or more materially false, fictitious and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the Federal Bureau of Investigation ("FBI"), which statements involved international and domestic terrorism, in that the defendant: (a) falsely stated to Special Agents of the FBI that he had disclosed to them all of the locations he visited during his trip to Pakistan and Afghanistan, which trip occurred on or about and between August 28, 2008 and January 22, 2009, when, in fact, as he then and there well knew and believed, he had not disclosed to them all of

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Cr. No. (T. 18, U.S.C., \$1001(a)(2) and 3551 et seq.) DEARE, CH. J

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the locations he visited during said trip; (b) falsely stated to Special Agents of the FBI that he had not had discussions with John Doe, an individual whose identity is known to the Grand Jury, about attending a camp to receive military-type training, when, in fact, as he then and there well knew and believed; he had had such discussions with John Doe; (c) falsely stated to Special Agents of the FBI that he did not know whether John Doe attended a camp to receive military-type training while in Pakistan, in or about and between August 28, 2008 and September 25, 2008, when, in fact, as he then and there well knew and believed, he did know that John Doe attended a camp to receive military-type training while in Pakistan during that time period.

(Title 18, United States Code, Sections 1001(a)(2) and 3551 <u>et seq</u>.)

A TRUE BILL

FOREPERSON

EEN ON D. CAM BELL UNITED STATES ATTORNEY EASTERN DISTRICT OF NEW YORK

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No._____

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UNITED STATES DISTRICT COURT Eastern District of New York

Eastern District of New Yor Criminal Division

THE UNITED STATES OF AMERICA

VS.

ZAREIN AHMEDZAY,

INDICTMENT (T. 18, U.S.C., §§ 1001 (a)(2) and 3551 et seq.)



AUSA Marshall Miller, (718) 254-6421

Bail, S

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