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DMB:MSA/SDD F.#2011R00783

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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AGRON HASBAJRAMI,

Cr. No. <u>11-623 (S-1)(JG)</u> (T. 18, U.S.C., §§ 2339A(a), 2 and 3551 et seq.)

SUPERSEDING INDICTMENT

BROOKLYN OFFICE

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Defendant.

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THE GRAND JURY CHARGES:

COUNT ONE (Provision and Attempted Provision of Material Support to Terrorists)

On or about and between February 23, 2011 and February 25, 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant AGRON HASBAJRAMI, together with others, did knowingly and intentionally provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments and weapons, knowing and intending that they were to be used in preparation for, and in carrying out, a conspiracy to commit at a place outside the United States an act that would constitute the offense of murder, kidnapping or maiming if committed in the special maritime and territorial jurisdiction of the United States, where one of the conspirators committed an act within the jurisdiction of the United States to effect an object of the

conspiracy, in violation of Title 18, United States Code, Section 956(a).

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(Title 18, United States Code, Sections 2339A(a), 2 and 3551 et seq.)

COUNT TWO

(Attempt to Provide Material Support to Terrorists)

On or about and between April 1, 2011 and September 6, 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant AGRON HASBAJRAMI, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments, weapons and personnel, knowing and intending that they were to be used in preparation for, and in carrying out, one or more of the following violations of Title 18, United States Code: (a) a conspiracy to commit at a place outside the United States an act that would constitute the offense of murder, kidnapping or maiming if committed in the special maritime and territorial jurisdiction of the United States, where one of the conspirators committed an act within the jurisdiction of the United States to effect an object of the conspiracy, in violation of Title 18, United States Code, Section 956(a); and (b) a conspiracy involving one or more conspirators outside the United States to kill one or more nationals of the United States, to wit: United States military personnel stationed

outside the United States, which killings would have constituted murder as defined in Title 18, United States Code, Section 1111(a), where one or more of the conspirators committed an overt act to effect the object of the conspiracy, in violation of Title 18, United States Code, Section 2332(b).

(Title 18, United States Code, Sections 2339A(a), 2 and 3551 et seq.)

COUNT THREE

(Provision and Attempted Provision of Material Support to Terrorists)

On or about April 6, 2011, within the Eastern District of New York and elsewhere, the defendant AGRON HASBAJRAMI, together with others, did knowingly and intentionally provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments and weapons, knowing and intending that they were to be used in preparation for, and in carrying out, a conspiracy to commit at a place outside the United States an act that would constitute the offense of murder, kidnapping or maiming if committed in the special maritime and territorial jurisdiction of the United States, where one of the conspirators committed an act within the jurisdiction of the United States to

effect an object of the conspiracy, in violation of Title 18, United States Code, Section 956(a).

(Title 18, United States Code, Sections 2339A(a), 2 and 3551 et seq.)

COUNT FOUR

(Provision and Attempted Provision of Material Support to Terrorists)

On or about April 29, 2011, within the Eastern District of New York and elsewhere, the defendant AGRON HASBAJRAMI, together with others, did knowingly and intentionally provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments and weapons, knowing and intending that they were to be used in preparation for, and in carrying out, a conspiracy to commit at a place outside the United States an act that would constitute the offense of murder, kidnapping or maiming if committed in the special maritime and territorial jurisdiction of the United States, where one of the conspirators committed an act within the jurisdiction of the United States to

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effect an object of the conspiracy, in violation of Title 18, United States Code, Section 956(a).

(Title 18, United States Code, Sections 2339A(a), 2 and 3551 et seq.)

A TRUE BILL

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



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| 3. | Arrest Date: | | | |
| 4. | Nature of offense(s): | • | | |
| | | Misdemeanor | | |
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By:

LORETTA E. LYNCH UNITED STATES ATTORNEY InSDD SETH DUCHARME, AUSA (718) 254-6021

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