FILED

## EMN/SDD:AAS/DMP F.#2014R01413

2015 APR -6 PM 4:06

U.S. DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

\_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ X

#### UNITED STATES OF AMERICA

- against -

ABDURASUL HASANOVICH JURABOEV, also known as "Abdulloh Ibn Hasan," AKHROR SAIDAKHMETOV, ABROR HABIBOV and DILKHAYOT KASIMOV,

# SUPERSEDING INDICTMENT

Cr. No. <u>15-95 (S-1)(WFK)</u> (T. 18, U.S.C., §§ 924(0), 1546(a), 2339B(a)(1), 2 and 3551 <u>et seq</u>.)

Defendants.

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THE GRAND JURY CHARGES:

#### <u>COUNT ONE</u>

(Conspiracy to Provide Material Support to a Foreign Terrorist Organization)

1. In or about and between August 2014 and February 2015, both dates

being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants ABDURASUL HASANOVICH JURABOEV, also known as "Abdulloh Ibn

Hasan," AKHROR SAIDAKHMETOV, ABROR HABIBOV and DILKHAYOT KASIMOV.

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 services and

JURABOEV and SAIDAKHMETOV as personnel, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

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

<u>COUNT TWO</u> (Attempt to Provide Material Support to a Foreign Terrorist Organization)

2. In or about and between August 2014 and February 2015, both dates

being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ABDURASUL HASANOVICH JURABOEV, also known as "Abdulloh Ibn Hasan," AKHROR SAIDAKHMETOV, ABROR HABIBOV and DILKHAYOT KASIMOV, 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 services and JURABOEV and SAIDAKHMETOV as personnel, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant.

(Title 18, United States Code, Sections 2339B(a)(1), 2 and 3551 et seq.)

<u>COUNT THREE</u> (Conspiracy to Use a Firearm)

3. In or about and between January 2015 and February 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants AKHROR SAIDAKHMETOV and ABROR HABIBOV, together with others, did knowingly and intentionally conspire to use and carry a firearm during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts One and Two, contrary to Title 18, United States Code, Section 924(c).

(Title 18, United States Code, Sections 924(o) and 3551 et seq.)

## COUNT FOUR (Travel Document Fraud)

4. In or about and between January 2015 and February 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant AKHROR SAIDAKHMETOV, together with others, did knowingly and intentionally make under oath, and knowingly subscribe as true under penalty of perjury under Section 1746 of Title 28, United States Code, one or more false statements with respect to one or more material facts to facilitate an act of international terrorism, to wit:

(a) that SAIDAKHMETOV intended to travel to Turkey, Uzbekistan and Kazakhstan, when in fact, as SAIDAKHMETOV then and there well knew and believed, he intended to travel to Syria; and

(b) that the purpose of SAIDAKHMETOV's travel was "travel" and "entertainment," when in fact, as SAIDAKHMETOV then and there well knew and believed, the purpose of his travel was to join the Islamic State of Iraq and the Levant;

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in an application required by the immigration laws and regulations prescribed thereunder, to wit: a Form I-131 Application for Travel Document, and did knowingly and intentionally present such application, which contained such false statements.

(Title 18, United States Code, Sections 1546(a), 2 and 3551 et seq.)

A TRUE BILE **FOREPERSON** 

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

ACTING UNITED STATES ATTORNEY PURSUANT TO 28 C.E.R. 0.120 4

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F. #2014R1413 FORM DBD-34 JUN. 85

No. 15-CR-95 (WFK)

# **UNITED STATES DISTRICT COURT**

EASTERN District of NEW YORK

CRIMINAL DIVISION

# THE UNITED STATES OF AMERICA

vs.

ABDURASUL HASANOVICH JURABOEV, AKHROR SAIDAKHMETOV, ABROR HABIBOV and DILKHAYOT KASIMOV,

Defendants

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SUPERSEDING INDICTME	NT
(T. 18, U.S.C., §§ 924(0), 1546(a), 2339B(a)(1), 2 and	3551 <u>et seq</u> .)
A true bill.	
	Foreperson
Filed in open court this day,	
of A.D. 20	
	Clerk
Bail, \$	

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Case	e 1:15-cr-00095-WFK Document 28-1 Filed 04/06/15 Page 1 of 1 PageID #: 105
	INFORMATION SHEET UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK U.S. DISTRICT COURT EASTERN DISTRICT OF NEW YORK
1.	Title of Case: United States v. Juraboev, et al., 15 CR 95 (S-1)(WFK)
2.	Related Magistrate Docket Number(s): 15 M 172
3.	Arrest Date: <u>2/25/2015</u>
4.	Nature of offense(s): Image: Second seco
5.	Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules):
6.	Projected Length of Trial:Less than 6 weeks⊠More than 6 weeks□
7.	County in which crime was allegedly committed: Kings, Queens_ (Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8.	Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012. <sup>1</sup> $\Box$ Yes $\boxtimes$ No
9.	Has this indictment/information been ordered sealed? $\Box$ Yes $\boxtimes$ No
10.	Have arrest warrants been ordered? $\square$ Yes $\square$ No

11. Is there a capital count included in the indictment?  $\Box$  Yes  $\boxtimes$  No

LORETTA E. LYNCH
UNITED STATES ATTORNEY
(m)

Alexander A. Solomon Assistant U.S. Attorney (718) 254-6074

Judge Brodie will not accept cases that were initiated before March 10, 2012.

By: