UNITED STATES DISTRICT COURT

District of Kansas

(TOPEKA DOCKET)

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 15-40030-01-CM

JOHN T. BOOKER, JR., a/k/a "Muhammad Abdullah Hassan,"

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

On or about April 10, 2015, in the District of Kansas and elsewhere, the

defendant,

JOHN T. BOOKER, JR., a/k/a "Muhammad Abdullah Hassan,"

attempted, without lawful authority, to use a weapon of mass destruction, namely a destructive device as defined by Title 18, United States Code, Section 921, against property that is owned, leased, and used by a department and agency of the United

States, that is: Fort Riley, an active duty United States Army Installation located between Junction City and Manhattan, Kansas.

All in violation of Title 18, United States Code, Section 2332a(a)(3).

COUNT 2

On or about April 10, 2015, in the District of Kansas and elsewhere, the defendant,

JOHN T. BOOKER, JR., a/k/a "Muhammad Abdullah Hassan,"

attempted to maliciously damage and destroy, by means of fire and explosive, buildings, vehicles, and other personal and real property in whole and in part owned or possessed by, and leased to, the United States, and departments and agencies thereof.

All in violation of Title 18, United States Code, Section 844(f)(1).

COUNT 3

On or between March 10, 2015 and April 10, 2015, in the District of Kansas and elsewhere, the defendant,

JOHN T. BOOKER, JR., a/k/a "Muhammad Abdullah Hassan,",

knowingly attempted to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), including property, services, and personnel, including himself, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant ("ISIL"), knowing that the organization was a designated terrorist organization, and that the organization engages in and has engaged in and was engaging in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B(a).

A TRUE BILL

<u>April 16, 2015</u> DATE

s/Foreperson FOREPERSON OF THE GRAND JURY

s/Barry R. Grissom BARRY R. GRISSOM United States Attorney District of Kansas 444 S.E. Quincy, Suite 290 Topeka, Kansas 66683 (785) 295-2850 (785) 295-2853 Facsimile Ks. S. Ct. No. 10866 Barry.Grissom@usdoj.gov

It is requested that the trial be held in Topeka, KS