



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. _____
(T. 18, U.S.C., §§ 2339B,
2 and 3551 et seq.)

MOHAMMED ALI HASSAN AL-MOAYAD and
MOHAMMED MOHSEN YAHYA ZAYED,

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE

On or about and between October 8, 1999 and January 10, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MOHAMMED ALI HASAN AL-MOAYAD and MOHAMMED MOHSEN YAHYA ZAYED, together with others, within the United States and subject to the jurisdiction of the United States, did knowingly and intentionally conspire to provide material support and resources to a foreign terrorist organization, to wit, *al Qaeda*.

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

COUNT TWO

On or about and between October 8, 1999 and January 10, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MOHAMMED ALI HASAN AL-MOAYAD, together with others, within the United States and subject to the jurisdiction of the United

States, did knowingly and intentionally provide material support and resources to a foreign terrorist organization, to wit, *al Qaeda*.

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

COUNT THREE

On or about and between October 8, 1997 and January 10, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MOHAMMED ALI HASAN AL-MOAYAD and MOHAMMED MOHSEN YAHYA ZAYED, together with others, within the United States and subject to the jurisdiction of the United States, did knowingly and intentionally conspire to provide material support and resources to a foreign terrorist organization, to wit, *Hamas*.

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

COUNT FOUR

On or about and between October 8, 1997 and January 10, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MOHAMMED ALI HASAN AL-MOAYAD, together with others, within the United States and subject to the jurisdiction of the United States, did knowingly and intentionally provide material support

and resources to a foreign terrorist organization, to wit, *Hamas*.

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

A TRUE BILL

FOREPERSON

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK