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UNITED	STATES DISTR	RICT COURT		Man 200	20-23
DIST	RICT OF CONN	ECTICUT	Rob	in D. Tabora, Clerk	
	Grand Jury N-1	9-1	By	Deputy Clerk	under the constantial and
				Deputy Clerk	TIVID PMS
STATES OF AMERICA		CRIMINA	AL NO. <sub>-</sub>	3.20CR	

## UNITED STATES OF AMERICA

v.

AHMAD KHALIL ELSHAZLY

VIOLATION:
18 U.S.C. § 2339B(a)(1)
(Providing Material Support and
Resources to Designated Foreign
Terrorist Organization)

## **INDICTMENT**

The Grand Jury charges:

## COUNT ONE

(Providing Material Support and Resources to Designated Foreign Terrorist Organization)

1. On or about September 4, 2018, through on or about December 15, 2019, in the District of Connecticut and elsewhere, the defendant AHMAD KHALIL ELSHAZLY knowingly attempted to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), that is, personnel, namely himself, to the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist organization, and knowing that ISIS had engaged in, and was engaging in, terrorist activity and terrorism, and the defendant AHMAD KHALIL ELSHAZLY was a United States citizen and the offense occurred in whole and in part within the United States.

In violation of Title 18, United States Code, Section 2339B(a)(1).

## FORFEITURE ALLEGATION

Upon conviction of the offense charged in Count One of this Indictment, the 2. defendant AHMAD KHALIL ELSHAZLY shall, pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. §§ 981(a)(1)(G)(i)-(iv), and 28 U.S.C. § 2461(c), forfeit to the United States:

- a. All of his assets, foreign or domestic (18 U.S.C. §§ 981(a)(1)(G)(i) and (iv) and 28 U.S.C. § 2461(c));\
- b. All assets acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing the offense charged in Count One of this Indictment (18 U.S.C. § 981(a)(1)(G)(ii) and 28 U.S.C. § 2461(c));
- c. All assets derived from, involved in, or used or intended to be used to commit the offense charged in Count One of the Indictment (18 U.S.C. § 981(a)(1)(G)(iii) and 28 U.S.C. § 2461(c)); and
- d. Any property, real or personal, which constitutes or is derived from proceeds traceable to the offense charged in Count One of the Indictment (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)).

Such assets include, but are not limited to: (1) \$500 in U.S. currency the defendant provided to a person on December 14, 2019; and (2) items seized from the defendant on December 15, 2019, including (a) \$500 in U.S. currency; (b) three \$100 Amazon gift cards; (c) Axon ZTE cellular telephone, Model ZTE-b20176; (d) Blackberry DTEK60; (e) ASUS micro storage device (thumb drive); and (f) Seagate 2000GB Hard Drive, SN-Z1E0KZ33.

All in accordance with Title 18 U.S.C. § 981(a)(1)(G), 28 U.S.C. § 2461(c), 21 U.S.C. §

853, and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

- But

/s/ FOREPÉRSON

LEONARD C. BOYLE FIRST ASSISTANT UNITED STATES ATTORNEY

DOUGLAS P. MORABITO ASSISTANT UNITED STATES ATTORNEY

JUSTIN SHER TRIAL ATTORNEY UNITED STATES DEPARTMENT OF JUSTICE