

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT
Grand Jury N-19-1

UNITED STATES OF AMERICA

CRIMINAL NO. 3:20CR71 (VAB)

v.

AHMAD KHALIL ELSHAZLY

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

SUPERSEDING 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).

COUNT TWO

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

2. 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, services, by administering chat rooms and servers to distribute propaganda and recruitment materials, 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

3. Upon conviction of the offenses charged in Counts One and Two of this Superseding Indictment, the 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 offenses charged in Counts One and Two (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 offenses charged in Counts One and Two (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 offenses charged in Counts One and Two (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

FOREPERSON


LEONARD C. BOYLE
ACTING UNITED STATES ATTORNEY


DOUGLAS P. MORABITO
ASSISTANT UNITED STATES ATTORNEY


MARGARET M. DONOVAN
ASSISTANT UNITED STATES ATTORNEY