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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2002 Grand Jury
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UNITED STATES OF AMERICA,)	Criminal Case No. _____
)	
Plaintiff,)	I N D I C T M E N T
)	
v.)	Title 21, U.S.C., Secs. 846
)	and 841(a) - Conspiracy to
SYED MUSTAJAB SHAH (1),)	Distribute Heroin and Hashish;
aka Syed Saadar Ali Shah,)	Title 21, U.S.C., Secs. 952, 960
aka Badshah Khan,)	and 963 - Conspiracy to Import
aka Syed Saadat Ali Faraz,)	Heroin and Hashish; Title 18,
aka Shajee,)	U.S.C., Sec. 2339B - Providing
MUHAMMED ABID AFRIDI (2),)	Material Support to Terrorists
aka Sunny)	
aka Saifullah Durrani,)	
ILYAS ALI (3),)	
)	
Defendants.)	

The grand jury charges:

Count 1

Beginning at a date unknown and continuing up to and including September 20, 2002, within the Southern District of California, and elsewhere, defendants SYED MUSTAJAB SHAH, aka Syed Saadar Ali Shah, aka Badshah Khan, aka Syed Saadat Ali Faraz, aka Shajee, MUHAMMED ABID AFRIDI, aka Sunny, aka Saifullah Durrani, and ILYAS ALI did knowingly and intentionally conspire together and with each other and with other

TWR:nlv(1):San Diego
10/30/02

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1 persons known and unknown to distribute 1 kilogram and more of heroin,
2 a Schedule I Controlled Substance, and 1,000 kilograms and more of
3 hashish, a Schedule I Controlled Substance; in violation of Title 21,
4 United States Code, Section 841(a)(1).

5 OVERT ACTS

6 In furtherance of the above conspiracy and to effect and
7 accomplish the objects thereof, the following overt acts, among
8 others, were committed within the Southern District of California, and
9 elsewhere:

- 10 1. On or about April 11, 2002, within the Southern District of
11 California, defendant ILYAS ALI, acting on behalf of
12 defendants SYED MUSTAJAB SHAH and MUHAMMED ABID AFRIDI,
13 negotiated with an undercover law enforcement officer for
14 the sale of ton quantities of hashish and multiple kilogram
15 quantities of heroin.
- 16 2. On or about September 15, 2002, defendants SYED MUSTAJAB
17 SHAH, MUHAMMED ABID AFRIDI and ILYAS ALI traveled from
18 Karachi, Pakistan, to Hong Kong, People's Republic of
19 China, to meet with undercover law enforcement officers
20 from the United States and to negotiate for the sale of ton
21 quantities of hashish and multiple kilogram quantities of
22 heroin.
- 23 3. On or about September 16, 2002, at a hotel in Hong Kong,
24 People's Republic of China, defendants SYED MUSTAJAB SHAH,
25 MUHAMMED ABID AFRIDI and ILYAS ALI negotiated with
26 undercover law enforcement officers from the United States
27 for the sale of 5 metric tons of hashish and 600 kilograms
28 of heroin.



1 4. On or about September 16, 2002, at a hotel in Hong Kong,
2 People's Republic of China, defendants SYED MUSTAJAB SHAH,
3 MUHAMMED ABID AFRIDI and ILYAS ALI agreed that the purchase
4 price of the 5 metric tons of hashish and 600 kilograms of
5 heroin could be offset against the cost of 4 "Stinger"
6 anti-aircraft missiles, which the defendants stated they
7 were interested in purchasing from the undercover law
8 enforcement officers.

9 5. On or about September 18, 2002, at a hotel in Hong Kong,
10 People's Republic of China, defendants SYED MUSTAJAB SHAH,
11 MUHAMMED ABID AFRIDI and ILYAS ALI told undercover law
12 enforcement officers from the United States that they
13 intended to sell the "Stinger" anti-aircraft missiles
14 discussed during the meeting on September 16, 2002, to
15 members of the Taliban, an organization which the
16 defendants indicated was the same as Al-Qaeda.

17 All in violation of Title 21, United States Code, Section 846.

18 Count 2

19 Beginning at a date unknown and continuing up to and including
20 September 20, 2002, within the Southern District of California, and
21 elsewhere, defendants SYED MUSTAJAB SHAH, aka Syed Saadar Ali Shah,
22 aka Badshah Khan, aka Syed Saadat Ali Faraz, aka Shajee, MUHAMMED ABID
23 AFRIDI, aka Sunny, aka Saifullah Durrani, and ILYAS ALI did knowingly
24 and intentionally conspire together and with each other and with other
25 persons known and unknown to import 1 kilogram and more of heroin, a
26 Schedule I Controlled Substance, and 1,000 kilograms and more of
27 hashish, a Schedule I Controlled Substance, into the United States
28 from a place outside thereof; in violation of Title 21, United States
Code, Sections 952 and 960.



OVERT ACTS

1
2 In furtherance of the above conspiracy and to effect and
3 accomplish the objects thereof, the overt acts alleged in Count 1,
4 realleged herein by reference, among others, were committed within the
5 Southern District of California, and elsewhere.

6 All in violation of Title 21, United States Code, Section 963.

7 Count 3

8 Beginning at a date unknown and continuing up to and including
9 September 20, 2002, within the Southern District of California, and
10 elsewhere, and subject to the jurisdiction of the United States,
11 defendants SYED MUSTAJAB SHAH, aka Syed Saadar Ali Shah, aka Badshah
12 Khan, aka Syed Saadat Ali Faraz, aka Shajee, MUHAMMED ABID AFRIDI,
13 aka Sunny, aka Saifullah Durrani, and ILYAS ALI did knowingly and
14 intentionally attempt and conspire together and with each other and
15 with other persons known and unknown to provide material support and
16 resources to a foreign terrorist organization, to wit, Al-Qaeda; in
17 violation of Title 18, United States Code, Sections 2339B(a)(1)
18 and (d).

19 OVERT ACTS

20 In furtherance of the above conspiracy and to effect and
21 accomplish the objects thereof, the overt acts alleged in Count 1,
22 realleged herein by reference, among others, were committed within the
23 Southern District of California, and elsewhere.

24 DATED: October 30, 2002.

25 A TRUE BILL:

26 A. J. Naus
Foreperson

27 CAROL C. LAM
United States Attorney

28 By: Todd Robinson
TODD W. ROBINSON
Assistant U.S. Attorney