

★ SEP 18 2009 ★

BROOKLYN OFFICE

DMB:SDD  
F.#2009R01764

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

BETIM KAZIU,

Defendant.

I N D I C T M E N T

Cr. No. **09 660**  
(T. 18, U.S.C.,  
§§ 956(a)(1), 956(a)(2),  
2339A(a) and 3551 et  
seq.)

GLEESON, J.

J. ORENSTEIN, M.J.

-----X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Commit Murder in a Foreign Country)

1. On or about and between January 1, 2009 and August 28, 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BETIM KAZIU, together with others, did knowingly and intentionally conspire to commit one or more acts outside the United States that would constitute the offenses of murder and maiming if committed in the special maritime and territorial jurisdiction of the United States, and one or more of the conspirators did commit an act within the jurisdiction of the United States to effect an object of the conspiracy.

2. In furtherance of the conspiracy and to effect its objectives, the defendant BETIM KAZIU knowingly committed and caused to be committed, among others, the following overt act:

a. On or about February 19, 2009, within the Eastern District of New York, the defendant BETIM KAZIU boarded a flight at John F. Kennedy Airport from Queens, New York to Cairo, Egypt.

(Title 18, United States Code, Section 956(a)(1), 956(a)(2) and 3551 et seq.)

COUNT TWO

(Conspiracy to Provide Material Support to Terrorists)

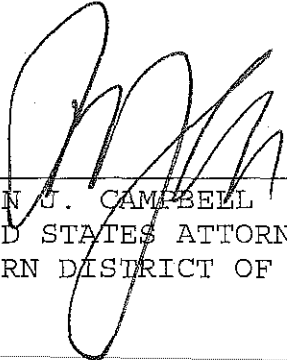
3. On or about and between January 1, 2009 and August 28, 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BETIM KAZIU, together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in 18 U.S.C. § 2339A(b), including property, tangible and intangible, and services, including personnel, knowing and intending that they were to be used in preparation for, and in carrying out, a conspiracy to commit at a place outside the United States an act that would constitute the offense of murder, kidnapping or maiming if committed in the special maritime and

territorial jurisdiction of the United States, where one or more of the conspirators did commit an act within the jurisdiction of the United States to effect an object of the conspiracy, in violation of Title 18, United States Code, Section 956(a).

(Title 18, United States Code, Section 2339A(a) and 3551 et seq.)

A TRUE BILL

  
FOREPERSON

  
BENTON J. CAMPBELL  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No.

JUN. 85

**UNITED STATES DISTRICT COURT**  
**EASTERN District of NEW YORK**

*Division*

**THE UNITED STATES OF AMERICA**

vs.

**BETIM KAZIU,**

Defendant

**INDICTMENT**

(T. 18, U.S.C., §§ 956 (a) (1), 956 (a) (2), 2339A (a) and 3551 et seq.)

*A true bill.*

*Rene Middleton Vargan*

*Foreman*

*Filed in open court this \_\_\_\_\_ day,*

*of \_\_\_\_\_ A.D. 20 \_\_\_\_\_*

*Clerk*

*Bail, \$ \_\_\_\_\_*

**SETH DuCHARME, AUSA (718) 254-6021**