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By ECF and hand-delivery

Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Parveg Ahmed*, 17 CR 378 (AMD)

Dear Judge Donnelly,

Mr. Parveg Ahmed has pled guilty to one count of attempting to provide material support and resources to a foreign terrorist organization, the Islamic State of Iraq and al-Sham (“ISIS,” “ISIL,” or the “Islamic State”), in violation of 18 U.S.C. §§ 2339B(a)(1) and (d). Specifically, in June 2017, Mr. Ahmed and another person¹ attempted to travel to Syria to join the Islamic State. For the reasons detailed below, a sentence of the 66 months (five-and-a-half years) already served in prison, followed by an additional seven years of supervised release, is sufficient, but not greater than necessary, to comply with the factors guiding federal sentencing.²

“[A] court’s duty is *always* to sentence the defendant as he stands before the court *on the day of sentencing.*” *United States v. Quintieri*, 306 F.3d 1217, 1230 (2d Cir. 2002) (emphases

¹ This person was charged separately. His case is currently pending before this Court.

² Mr. Ahmed was arrested in Jordan on June 16, 2017. On August 28, 2017, US law enforcement agents arrested him at JFK airport after he had been deported from Jordan.

added). The 27-year-old Parveg Ahmed that will be standing before the Court on December 20, 2022 is an entirely different person than the naive and brainwashed youngster who contrived to enter Syria almost six years ago. Among other things, Mr. Ahmed has entirely rejected the radical Islamic ideology that once guided him. His sentence should recognize and reflect that difference.

Mr. Ahmed's downfall was his young age and fragile mental state. Parveg was a naive teenager suffering from severe depression who was consistently bullied both at home and at school, making him a classic target and victim of online radicalization. Searching for the comfort and support of God, and not knowing any better, he was indoctrinated by the sermons and speeches of radical Islamists like Anwar al-Awlaki and Abdullah el-Faisal into believing that being a true Muslim required adopting and advocating the tenets of violent jihad advanced by the Islamic State.

As often happens, with increasing age comes increasing wisdom, and there is a world of difference between the 22-year-old who committed the crime and the 27-year-old being sentenced by the Court. In this regard, it is the independent expert opinion of Forensic Psychologist Dr. Kostas A. Katsavdakis that Mr. Ahmed currently poses a low risk of recidivism or danger to the community if released to a half-way house, and that even this low risk can readily be managed through non-incarceratory means such as continued mental health counseling and related treatment. *See* October 27, 2022 Forensic Evaluation Report of Kostas A. Katsavdakis ("Dr. Katsavdakis Report").³

While he remains a practicing Muslim, Mr. Ahmed now entirely rejects the type of Islam wrongly espoused by the Islamic State and its supporters. He is deeply ashamed and remorseful

³ Dr. Kostas A. Katsavdakis has a PhD in Forensic Psychology and is a member of the American Board of Professional Psychology. To reach his conclusions, Dr. Katsavdakis reviewed multiple records and reports related to Mr. Ahmed's history and treatment, and personally met and evaluated Mr. Ahmed on two occasions at the MDC and several times by videoconference. *See* Dr. Katsavdakis Report at 1 (Course of Evaluation). The report is attached as Exhibit A.

for his prior radical beliefs, and for the harm his prior actions caused others and his family, including the harm he might have caused if he had managed to enter Syria or contact ISIS once there. He has been in therapy, voluntarily and successfully, since April 2021. This therapy has concentrated on, among other things, how and why he was led astray, so Mr. Ahmed can help prevent others from making the same mistake. He also works to decrease violence in his Unit at MDC Brooklyn (“MDC”). Upon his release, he will, with the support of his family, live a quiet and law-abiding life as a productive member of society.

There is much to recommend about the Parveg Ahmed of December 2022. As the letters and documents accompanying this memorandum attest, he has put in the hard work and effort necessary to change, and he has truly turned his life around. Hence, the sentencing goals of specific deterrence and rehabilitation have already been met, and the sentencing goals of general deterrence and punishment also are met by the requested sentence of time served and supervised release—especially considering the terrible conditions under which Mr. Ahmed has been held since his arrest, both in Jordan and at MDC. Indeed, imposing a sentence that accounts for Mr. Ahmed’s genuine remorse and successful rehabilitative efforts will encourage other offenders and potential offenders to reform and reject violence, just as Mr. Ahmed has done.

For these reasons, and the others discussed below, the Court should sentence Mr. Ahmed to the 66 months he already has served in prison, followed by 84 months of supervised release. Such a sentence, totaling 151 months, accords with the parsimony principle that guides federal sentencing and is the proper and sufficient sentence for Mr. Ahmed.

BACKGROUND⁴

Parveg Ahmed

Parveg's unsuccessful attempt to enter Syria was the final act in a radicalization process that began while he was still in high school. "Mr. Ahmed's seeds for terrorist targeted violence emerged in the context of a dysfunctional family, undiagnosed mental health problems, social/intimate relationship deficits and escalating failures across multiple domains." (Ex. A at 5). Beset by deep depression, desperate for positive affirmation and a place to belong, and having been bullied and abused his entire life, Mr. Ahmed quickly fell for the persecution narrative and invitation to join a greater "Caliphate" movement being offered online by radical Islamist preachers.

Parveg Ahmed is the second oldest of four children born to Bangladeshi immigrants, Abdul Hannan and Asma Begum. (PSR ¶ 32). Parveg was born in Sylhet, Bangladesh, but he moved to the United States with his parents when he was an infant and is a United States Citizen. (PSR ¶ 37). Parveg had a difficult childhood. His family was poor. While his father worked long hours as a food vendor, there never seemed to be enough, leading to constant financial pressure and the family having to move from place to place in Queens and Brooklyn during Parveg's formative years. It was not until Parveg was eight years old that the family, while still poor, found enough financial stability to relocate to an apartment in Ozone Park, Queens where the family still lives.

Parveg's father was a disciplinarian. (PSR ¶ 34). More than that, he reacted to the pressures

⁴ The factual bases for Mr. Ahmed's sentencing request are found in the PSR and the following attachments: Exhibit A—Dr. Katsavdakakis's report; Exhibit B—a letter addressed to the Court from Mr. Ahmed; Exhibit C—letters from Mr. Ahmed's family and friends; Exhibit D—certificates of achievements from MDC; Exhibit E—letters from residents of MDC; Exhibit F—a letter and transcript from a paralegal certificate program completed by Mr. Ahmed; Exhibit G—a letter from Dmitri Oster, licensed social worker; and Exhibit H—a letter from Lisa McDermott, Mr. Ahmed's current licensed mental health counselor.

he faced, and seeing his children becoming Americanized, by physically and emotionally abusing his children. *Id.* Parveg often bore the brunt of his father's abuse. Parveg was regularly beaten until he was twelve years old. *Id.* Worse than the physical abuse was his father's "tremendous verbal abuse," which did not stop. *Id.* "[T]hroughout his childhood his father taunted him, called him names, and mocked him." *Id.* Parveg "woke up to 'verbal abuse and went to sleep with verbal abuse.'" *Id.* His father's abuse at home was compounded by several instances where he was sexually molested by male friends of the family and by the bullying Parveg experienced in school, particularly in middle school. (Ex. A, addendum A at 12). Socially awkward and lacking in self-confidence, Parveg became a magnet for abuse. He was constantly mocked for his weight, race, nationality, and hygiene. Almost every day at school he was picked on and called "ugly," "fat," "squarehead," "Parfag," and "Parfag germs" by his peers. (PSR ¶ 34).

Smart and studious, Parveg always did well in school. While he ultimately was not chosen, he made it to the finals of the Prep for Prep program, and later tested into Stuyvesant High School, one of New York City's top public schools. (PSR ¶ 49). Parveg had hoped that getting into Stuyvesant would prove his worth to his father, but nothing really changed. His father continued to belittle and abuse him, letting Parveg know every day that he was a failure and a disappointment to his family. (PSR ¶ 42).

Parveg became increasingly depressed and anxious, exhibiting clear signs of the clinical depression that ran in his family, such as sleeping all day and retreating from friends and family. (PSR ¶ 42). Absent any real or lasting treatment, Parveg's mental health problems increased. He started cutting class, became disruptive when in school, and abused a variety of drugs, including alcohol, Xanax, codeine, LSD, mushrooms, and marijuana, which he smoked daily from 15 years old to 19 years old. (PSR ¶ 44). Parveg explains: "The bullying I had endured in middle school

and at home began surfacing as depression and anxiety, so I turned to drugs (mainly marijuana) to cope with all the negative feelings, but that only made it worse. In my youth and drug-induced haze, I didn't much care about all the classes I began failing.” (Ex. B at 1). In September 2014, Parveg, who had been a high academic achiever his entire life, barely graduated from Stuyvesant, finishing with a cumulative G.P.A. of 65.95. (PSR ¶ 49).

Because his father would not accept him as a man,” Parveg became “desperate to find manhood – through girls, drugs, sports, fighting, etc.” (PSR ¶ 42). When none of that seemed to work, he “looked for direction and guidance” from religion. While his family is proudly Muslim, they are more culturally Muslim than practicing Muslims. Looking for guidance on how to be a proper Muslim, Ahmed began watching ISIS videos and sermons online. Many of these online ISIS videos showed ISIS members helping the poor and downtrodden; they were skillful propaganda productions, designed to fool the ignorant and desperate like Parveg Ahmed. “Thinking they were pious Muslims, I fell for their propaganda, seeing that they were quoting the Qur'an but not realizing it was improperly interpreted and believing their historical facts, not realizing it was their fanciful spin on history.” (Ex. B at 1). To his terrible regret and shame, Parveg swallowed the ISIS line.

After high school, Parveg continued to drift. He studied computer science at Hunter College from January 2014 to July 2015, before being expelled because he had a 1.9 G.P.A. (PSR ¶ 48). Then, from September to December 2016, he studied computer science at the New York City College of Technology but quit after just one semester. (PSR ¶ 47). Trapped in what seemed to him to be a never-ending cycle of failure, depression, and desperation, Mr. Ahmed clung tighter and tighter to the ISIS narrative and the sense of empowerment it gave him as “somebody who had failed at most aspects of his life and was now being told his failures were due to a world-wide

conspiracy against Muslims.” (Ex. B at 1). Just six months after quitting college, Parveg left the U.S. and traveled to the Middle East to try to join the Islamic State.

The Offense Conduct and Advisory Guidelines Term

On June 20, 2018, Mr. Ahmed pled guilty to one count of attempting to materially support a designated foreign terrorist organization, in violation of 18 U.S.C. §§ 2339B(a)(1) and (d). (PSR ¶¶ 1 and 13). The specific conduct at issue – expressing support for ISIS in social media and eventually traveling from Saudi Arabia to Jordan with the intent of entering Syria and joining ISIS – took place almost entirely before Mr. Ahmed turned 22 years old. He was arrested in Jordan the day after his 22nd birthday.

The PSR finds an advisory guidelines term of 240 months in prison. (PSR ¶¶ 60-61).⁵ Mr. Ahmed agrees to this guideline calculation, and indeed stipulated to it in the plea agreement. However, he did not play an aggravating role in the offense and therefore objects to the 2-level enhancement found at PSR ¶ 16. Neither Mr. Ahmed nor the person he traveled to Jordan with can accurately said to have led or recruited the other.⁶ They had had hatched the plan between themselves with neither playing a dominant or leadership role, and were arrested in Jordan together after trying to enter Syria. In any case, the enhancement has no effect on the applicable guideline

⁵ Pursuant to USSG § 5G1.1(a), where the statutory maximum sentence is less than the applicable guideline range, it “shall be the guideline sentence.” As to criminal history, this is Mr. Ahmed’s first and only offense; he has no prior arrests or convictions. (PSR ¶ 27). However, his criminal history category was raised from I to VI pursuant to USSG § 3A1.4(b). *Id.*

⁶ The purported evidence that probation and the government rely on to support this enhancement is either conclusory, incorrect, or not indicative of leadership. As an example, PSR ¶ 11 states that Mr. Ahmed “recruit[ed] the co-conspirator to travel with him an to join ISIS,” but provides no factual basis for this assertion. As another example, Mr. Ahmed did not take “the lead in planning and organizing the trip,” as stated in ¶ 11. Prior to their arrest in Jordan, Parveg and the other person arrested traveled to Saudi Arabia from New York with Mr. Ahmed’s father and maternal uncle for Umrah (an Islamic pilgrimage to Mecca). The travel plans were made by Mr. Ahmed’s father and uncle, who were never aware that the younger two men planned to attempt to enter Syria.

range, which stands at 20 years with or without the unwarranted 2 points.

For the many reasons discussed herein, this purely advisory guidelines term is neither necessary nor appropriate here.

Mr. Ahmed's Remorse, Rehabilitation, and Lack of Future Risk

This is a story of ruin *and redemption*. Since his arrest and incarceration, Mr. Ahmed has used his years in prison wisely and well. Among other things, his continued study of his faith has led him to squarely and utterly reject his prior support of violent extremism and those, like ISIL, that use Islam to justify their terrorism.

At the time of his offense, Mr. Ahmed was new to the practice of his faith and relatively ignorant as to its proper tenets and history. In his years in jail, Mr. Ahmed has studied Arabic, the Qur'an, and the history of Islam and the Middle East. Those studies have allowed him to “see clearly the fallacies of ISIS ideology” and “the fallacies of ISIS’ history lessons.” (Ex. B at 6).

With his deeper understanding of his religion, he can now

clearly see that ISIS is full of hot air, wrong interpretations, and lies. In the future, I would like to help disseminate more information refuting them so that other naive, young Muslims don't get caught up in their madness. ... They [ISIS] are a nihilistic, destructive group who can't be reasoned with. I'm ashamed I previously aligned myself with them and all the cruelty, violence, and bloodshed they bring to the world, and I am terribly sorry that I tried to make myself an instrument to such horrors..

Id.

There is no question that Mr. Ahmed's years in jail have fundamentally changed him. As he explains:

I also learned tolerance in jail. After I became radicalized, I stayed away from everyone who wasn't Muslim. Coming to jail, I had to live with people from different cultures, religions, and backgrounds. Although at first, I definitely struggled, I soon began to enjoy bunking with people of different backgrounds: I've stayed with Russians, Chinese, Koreans, African Americans, White Americans, Africans, Hispanics and everything in between. I've shared a cell with people who were Sikh, Jewish, Christian, Muslim, and even Atheists. I always asked a lot of

questions and tried to learn about all the different cultures. It's one thing to read about culture in a book, but it's a whole other thing to live with somebody immersed in the culture their whole lives. While it strengthened my faith in Islam, these interactions made me learn to respect and empathize with the different peoples of the world.

(Ex. B at 3).

An integral part of Mr. Ahmed's rehabilitation and ongoing recovery are the counseling sessions voluntarily undertaken by him. He has been in regular counseling – first with Licensed Clinical Social Worker Dmitri Oster from April 12, 2021 to July 29, 2022, and then with Licensed Mental Health Counselor Lisa McDermott, commencing in October 2022 – to identify and deal with the factors that led to his offense.⁷ LCSW Oster writes: “Since beginning his treatment, client has [been] open and honest in discussing his predicament and makes productive usage of his counseling sessions by reviewing and speaking about his past actions ... appears to be taking measured steps to disassociate himself from all types of violent ideologically-driven and jihadi movements ... [and] committed himself to those actions vis-à-vis his positions (Imam) within the MDC and as an individual person of faith.” (Ex. G at 2). This analysis is echoed by Mr. Ahmed, who states that his sessions with Mr. Oster “played a major role in my improved mental health & self image,” and that Mr. Oster “helped me to understand how religion could play a positive role in my life, simply without the aggression, intolerance, and the black/white mentality I had previously attached to it.” (Ex. B at 3). Indeed, having studied and learned enough to be his Unit's Imam, Mr. Ahmed now leads daily prayers and gives weekly sermons to his congregation. His sermons reject radicalism in all its forms, focusing on how a Muslim should remain humble and

⁷ Mr. Ahmed began counseling in late 2019 with Rebecca Weiser, LMSW, but these sessions ended after the pandemic began in Spring of 2020.

avoid conflict. The leadership and responsibility inherent in being an Imam has played a pivotal role in Mr. Ahmed's maturation and growth. He "was forced to learn how to inspire others, keep people together, and resolve conflicts," and he does his best to lead by example and make the Unit "into a place of peace and civility." (Ex. B at 4).

Mr. Ahmed's hard work and efforts have fundamentally transformed him. He no longer believes violence, religion-based or otherwise, is an appropriate response to any dispute or disagreement, and he has found his self-worth in learning how to cook and clean, in self-improvement, in continuing his education, and in learning how to push through hardship. *See generally* (Ex. A and B). Importantly, in the expert opinion of Dr. Katsavdakakis, these sincere changes in Mr. Ahmed's attitudes and beliefs means he currently poses a low risk of recidivism or danger to the community, a low risk that can be readily managed through non-incarceratory means, such as continued mental health counseling and related treatment:

It is this examiner's opinion that Mr. Ahmed, based on the integration of the prior and current assessment process, currently poses a low risk for further terrorist targeted violence. ...

... Mr. Ahmed's current low risk for targeted violence can be managed via continued outpatient treatment, employing supportive cognitive-behavioral tactics, alongside supervision and residing in a half-way house prior to residing on his own. This examiner does not recommend a return to his home in Queens given the unstable environment. Mr. Ahmed remains receptive to 1:1 counseling but the process, as indicated in the prior Report, will be slow as he tends to present himself in an overly favorable light. Moreover, his eagerness to marry should be carefully monitored as it may serve as a further psychosocial stressor. It remains this examiner's opinion that a pharmacological assessment and/or intervention be considered to manage emerging depressive and anxiety related symptoms. Finally, the participation of a substance use program is strongly recommended.

(Ex. A at 5).

Dr. Katsavdakakis's recommendations are welcomed by Mr. Ahmed, who has given careful thought and planning to how he will continue his positive growth upon release from prison. He understands that, as recommended by his therapists and Dr. Katsavdakakis, his life outside prison is

best begun at a halfway house, and that he must continue therapy. In this regard, he intends to continue therapy with LMHC McDermott and obtain additional therapeutic assistance through the Department of Probation and enrollment in the DEEP program upon release. *See* December 6, 2022 Letter from LMHC Lisa McDermott to Court (Ex. H) .

In addition to continued therapy, Mr. Ahmed plans for his future includes education. Mr. Ahmed continued studying and taking classes in prison. He enrolled in and completed many of the sparse educational opportunities available at MDC. (Ex. C and D). He also tutors other inmates studying for their GED. *Id.*

One of Parveg's proudest achievements was completing a paralegal certification course while incarcerated, because it showed how far he had come and how much he had changed. He explains:

But my biggest challenge was the Paralegal Certificate Course I enrolled in. It was 31 tests long and consisted of long and densely-worded workbooks to learn from, full of new vocabulary and new concepts. While I started out strong, near the middle, that familiar boredom, procrastination, and desire to quit crept in. I almost gave up at one point, but when I realized that I would be doing what I had done throughout my life, I struggled through and kept pushing, willing myself to the finish line. It might not mean much to others, but that Paralegal Certificate is the accomplishment I am most proud of. It was tough material and I wanted to quit, but I was finally able to persevere to the end of a project. It gives me great confidence knowing I completed it, feeling like I now both know and HAVE what it takes to accomplish anything!

(Ex. B at 4). After his release, Mr. Ahmed would like to take computer coding courses, and this time keep pushing until he succeeds:

When I get out, the first thing I want to do is take a Computer Coding Course. I enjoyed the coding class I took in college and can see myself excelling at it with enough study. I hope the coding course will allow me to develop invaluable, in-demand skills which would allow me to have a stable career and source of income. If that is not available, then I would look into some technical training, such as electrician or HVAC courses. After securing a job, I would like to get married and have kids. The plan after that is to focus on my family, but also write part-time, so that I can fulfill my dreams of publishing books. I have had a zeal for God and religion ever since I started practicing, and this is partially what led me to fall for

ISIS propaganda. Now I feel I have a much healthier way to express this zeal: writing books on God & religion, helping others to develop that same love that I have for them. I know I still have a lot to learn about life, but I believe that I have the necessary humility and determination to learn and grow. I look forward to the next chapter of my life.

(Ex. B at 7).

Despite his troubled history with certain members of his family, Mr. Ahmed is deeply sorry for the pain he has caused them. *See* Ex. B at 2 (“what hurt me the most [in being arrested and imprisoned] was seeing how much I hurt my family”). Indeed, knowing the pain he had caused his family was a primary motivator for his decision to try to fix his life and turn things around. *Id.* He is determined to lead a law-abiding and responsible life so that he will never shame or hurt them again.

Mr. Ahmed summarizes the many changes he has effected in the years since his arrest – changes that strongly support the requested non-guidelines sentence – as follows:

Your Honor, I have made a strong effort to change. Today I always try to be a positive influence on those around me. . . . I only ask that you give me a second chance and show leniency at sentencing. I promise you that you will never regret it.

(Ex. B at 7).

ARGUMENT

A. The Legal Standards for Sentencing

In selecting a sentence, this Court takes as its “lodestar the parsimony clause of 18 U.S.C. § 3553(a).” *United States v. Douglas*, 713 F.3d 694, 700 (2d Cir. 2013). That provision directs sentencing courts to “impose a sentence sufficient, but not greater than necessary, to comply with’ the factors set out in 18 U.S.C. § 3553(a)(2),” i.e., “proportionality, deterrence, incapacitation, and rehabilitation.” *Id.*; *see also, e.g., Pepper v. United States*, 562 U.S. 476, 493 (2011); *Dean v. United States*, 137 S. Ct. 1170, 1175 (2017); *United States v. Ministro-Tapia*, 470 F.3d 137, 142

(2d Cir. 2006).

In determining such a sentence, the sentencing court must consider the United States Sentencing Guidelines, the nature and circumstances of the offense, the history and characteristics of the defendant, the need for the sentence imposed to serve the purposes of sentencing, the kinds of sentences available, the need to avoid unwarranted sentencing disparities among defendants with similar records who have been found guilty of similar conduct, and the need to provide restitution to any victims of the offense. *Id.*, 18 U.S.C. § 3553(a)(1). In addition, the sentencing court may consider any “information concerning the background, character, and conduct” of the defendant, including age, educational and vocational skills, mental and emotional conditions, and lack of guidance as a youth. *Id.*, 18 U.S.C. § 3661.

While the sentencing guidelines comprise one factor for this Court to consider, they are only one such factor, and “truly are advisory.” *Douglas*, 713 F.3d at 700 (quoting *United States v. Cavera*, 550 F.3d 180, 189 (2d Cir. 2008) (en banc)). This Court “may not presume that the Guidelines range is reasonable,” but rather “must make an individualized assessment based on the facts presented.” *Gall v. United States*, 552 U.S. 38, 50 (2007); *see also Nelson v. United States*, 555 U.S. 350, 352 (2009). Here, an individualized assessment of the § 3553(a) factors (and application of the parsimony clause) support the requested sentence of time served (66 months), followed by seven years (84 months) of supervised release.

B. The 3553(a) Sentencing Factors Strongly Support the Requested Non-Guidelines Sentence

As detailed above, Mr. Ahmed’s personal characteristics and history support the requested non-guidelines sentence. Federal courts have long recognized that the “significant gaps” in maturity and pernicious vulnerability to outside influence that so affect the young are relevant to sentencing. *Miller v. Alabama*, 567 U.S. 460, 471 (2012); *Gall v. United States*, 552 U.S. 38 (2007)

(holding that “it was not unreasonable for the District Judge to view [21-year-old] Gall’s immaturity at the time of the offense as a mitigating factor, and his later behavior as a sign that he had matured and would not engage in such impetuous and ill-considered conduct in the future”); *Johnson v. Texas*, 509 U.S. 350, 367 (1993) (finding, in the case of a 19-year-old convicted of murder, that there “is no dispute that a defendant’s youth is a relevant mitigating circumstance. ... Our cases recognize that ‘youth is more than a chronological fact. It is a time and condition of life when a person may be most susceptible to influence and to psychological damage’”) (quoting *Eddings v. Oklahoma*, 455 U.S. 104, 115 (1982)). It is evident that Mr. Ahmed is a good person who was dangerously misled by ISIS’s lies as a teenager and young adult. At the time, he was deeply vulnerable to those lies because of years of physical and emotional abuse, mental health problems, and resulting failures, all of which were unaddressed at the time. (Ex. A at 5). Science makes clear that there are “fundamental differences between juvenile and adult minds. For example, parts of the brain involved in behavior control continue to mature through late adolescence.” *Graham v. Fla.*, 560 U.S. 48, 68 (2010) (citations omitted). In addition, adolescence is a period characterized by increased impulsivity, risky behaviors, and reward-seeking as a result of the asynchrony in the development of the affective and cognitive centers of the brain. The affective centers of the brain mature immediately in early adolescence, igniting heightened reward-seeking behaviors, while the cognitive control centers which increase self-regulation competence develop more gradually, reaching maturity in the mid-20s. Consequently, adolescents experience greater urges to pursue reward and weakened capacities to inhibit such actions at the same time. The combination of heightened attentiveness to rewards and still-maturing impulse control makes middle and late adolescence a period of greater risk-taking than any other stage of development, with the riskiest behaviors occurring between 18 and 21. Because adolescents at this age are at

the threshold of their independence, much of these risky behaviors are unmonitored by adults, making this a very vulnerable period in every teenager's development.⁹

In the years since his arrest, Mr. Ahmed has taken, and continues to take, concrete steps to address the circumstances that made him susceptible to radicalization and has fundamentally changed for the better. It is this better man, and not the "arrogant and ignorant man-child" who committed the offense (Ex B at 1), that must be individually considered and then sentenced by the Court. *See United States v. Rose*, 379 F. Supp. 3d 223, 233-234 (S.D.N.Y. 2019) ("the district court [must] be able to consider the most recent evidence of a defendant's life and characteristics, which may be the most probative information available, when deciding whether a defendant should continue to be incarcerated or, in some cases, be immediately released"); *Pepper v. United States*, 562 U.S. 476, 477 (2011) (holding that, for sentencing purposes, it is the "most up-to-date picture of [a defendant's] history and characteristics" that should be treated as fundamental).

Today, Mr. Ahmed "take[s] full responsibility for [his] actions" (Ex B at 1) and is "very remorseful for his criminal conduct." (PSR ¶ 37). He has rejected his prior radical beliefs and is committed to leading a law-abiding and even exemplary life, as demonstrated by his voluntary entry into counseling while incarcerated and efforts to decrease and resolve conflict and violence in his cell block. *See Ex. B and E.* Mr. Ahmed's history in detention – five years of moderation and trying to follow a path of peaceful growth and education – provides strong evidence of successful rehabilitation. It also strongly evidences that Mr. Ahmed presents little risk of recidivism or community danger if he completes the rest of his sentence under supervised release. *See United States v. Jones*, 2021 U.S. Dist. LEXIS 60632 (D. Conn 2021) (defendant's "efforts

⁹ Steinberg L. A Social Neuroscience Perspective on Adolescent Risk-Taking. *Dev Rev.* 2008;28(1):78-106. doi:10.1016/j.dr.2007.08.002

toward rehabilitation support the conclusion that he has a low risk of recidivism and therefore that his release does not pose a risk to public safety”).¹⁰ Simply put, Mr. Ahmed will not re-offend. *See, e.g.,* Ex. A at 5. Moreover, continuing counseling and treatment during the seven years of supervised release that would follow his release dovetails with the sentencing goal of providing a defendant with needed educational or vocational training, medical care, or other treatment in the most effective manner. 18 U.S.C. § 3553(a)(2). Thus, Mr. Ahmed’s history and individual characteristics strongly support the requested non-guidelines sentence.

Likewise, the sentencing goals of specific deterrence and rehabilitation already have been met here. Mr. Ahmed’s (i) wholesale and sincere rejection of his prior radical beliefs; (ii) efforts to aid and counsel his fellow inmates; (iii) genuine remorse and acceptance of responsibility for his actions; and (iv) entry into voluntary counseling to understand the sources of his prior mistaken choices all demonstrate that Mr. Ahmed has turned his life around. He is committed to maintaining progress and continuing to achieve in the future. He has a plan for success outside of prison and is fully supported in that plan by his family. In any event, Congress has recognized that “imprisonment is *not* an appropriate means of promoting correction and rehabilitation.” 18 U.S.C. § 3582(a) (emphasis added). Indeed, correction and rehabilitation are best addressed in this case not by adding additional years to the five-and-a-half years already served, but by allowing Mr. Ahmed to lead a quiet and law-abiding life under supervised release with continued treatment.

As to incapacitation and punishment, the requested non-guidelines sentence is sufficient punishment given his reformation. While well below the advisory guidelines range, Mr. Ahmed

¹⁰ *See also United States v. Vargas*, 502 F. Supp. 3d 820 (S.D.N.Y. 2020) (“because of the seriousness of Mr. Vargas’ past conduct, his rehabilitation is critical to the court’s finding that [he] likely does not pose a danger to the public”); *United States v. Core*, 125 F.3d 74, 75 (2d Cir. 1997) (“We find nothing in the pertinent statutes or the Sentencing Guidelines that prevents a sentencing judge from considering post-conviction rehabilitation in prison as a basis for departure.”).

already has spent 20% of his life in jail paying for his actions, and he would be sentenced to an additional seven years of supervised release. In this regard, the United States Supreme Court has emphasized that supervised release “is not merely ‘letting an offender off easily,’” *Gall v. United States*, 552 U.S. 38 (2007), because supervised release involves “substantial restrictions on freedom” that effectively deter and punish in their own right. *Id.* Under the requested sentence, Mr. Ahmed would serve 151 months – over twelve years – as punishment for his actions as a young man.

Further, conditions at the MDC during Mr. Ahmed’s time there have been nearly unbearable at times, increasing the punitive nature of his confinement. Not only has Mr. Ahmed had to endure the degraded conditions at MDC resulting from the COVID pandemic; he was also there during the weeklong blackout in early 2019. For years now, he has been subject to “onerous lockdowns and restrictions” originated to limit the spread of the virus within BOP facilities. *See United States v. Rodriguez*, 492 F. Supp. 3d 306, 311 (S.D.N.Y. 2020). Recently, the BOP again imposed a nationwide lockdown restricting all movement, including legal visits, in response to an incident in a BOP facility in Texas.¹¹ Regardless of the rationale behind such lockdowns and restrictions, it cannot be denied that the sentences of those incarcerated at this time are “harsher and more punitive than would otherwise have been the case.” *Id.* *See also United States v. Hatcher*, 2021 WL 1535310, at *3 (S.D.N.Y. Apr. 19, 2021); *United States v. Mcrae*, 2021 WL 142277, at *5 (S.D.N.Y. Jan. 15, 2021); and *United States v. Ciprian*, 2021 U.S. Dist. LEXIS 18698, at *8 (S.D.N.Y. Feb. 1, 2021.) Mr. Ahmed was also held for more than 2 months in solitary confinement in Jordan prior to his deportation and subsequent arrest in the United States. The deleterious effects of solitary confinement, even for a relatively short period, are well-researched and well-known.

¹¹ <https://www.nytimes.com/2022/01/31/us/politics/ms13-texas-prison-fight.html>.

See, e.g., Williams v. Sec'y Pennsylvania Dep't of Corr., 848 F.3d 549, 566 (3d Cir. 2017) (Solitary confinement “is psychologically painful, can be traumatic and harmful, and puts many of those who have been subjected to it at risk of long-term damage. . . There is not a single study of solitary confinement wherein non-voluntary confinement that lasted for longer than 10 days failed to result in negative psychological effects.”)

As for general deterrence, the requested sentence will generally deter others who are considering making the same type of mistake as Mr. Ahmed. Studies have shown that it is the arrest that best deters, not the length of the sentence.¹² Here, Mr. Ahmed’s neighbors, associates, and community already have seen him arrested and imprisoned both overseas and in the United States. Mr. Ahmed has been locked away over five years and will be under supervised release for seven years more – a sentence that is more than enough to deter others.

By contrast, the guidelines sentence advocated by the government violates the parsimony principle guiding federal sentencing because it is far greater than necessary to punish Mr. Ahmed or deter others. Indeed, a longer sentence would be self-defeating and contrary to the sentencing goals. It would be a message to others that even the best efforts to rehabilitate and reject radical Islam and become a lawful, contributing member of society will be ignored, or have little impact, at sentencing. Ignoring or giving short shrift to Mr. Ahmed’s rehabilitation and change of heart, as the government may well urge, could be twisted by others to feed into the radical narrative that Muslims will always be hated, persecuted, and unfairly treated in the West. Imposing a non-guidelines sentence based on who Mr. Ahmed is today is not only required of the Court (*Quintieri*,

¹² See Valerie Wright, THE SENTENCING PROJECT, DETERRENCE IN CRIMINAL JUSTICE: EVALUATING CERTAINTY VS. SEVERITY OF PUNISHMENT, 5-6 (2010), <http://www.sentencingproject.org/wp-content/uploads/2016/01/Deterrence-in-Criminal-Justice.pdf>.

306 F.3d at 1230), it will strongly encourage others to make the same positive choices and strides as Mr. Ahmed. Moreover, having Mr. Ahmed out in his community condemning violent extremism will do far more to deter others than sentencing him to more years in prison.

In *United States v. Ahmed*, No. 1:15-cr-00049 (D. Minn.), the court sentenced the defendant to ten years for attempting to travel to Syria to join and fight with ISIS. Importantly, the sentencing court recognized that the sentencing focus must remain on the defendant being sentenced, rather than ISIS, and that, even in cases involving ISIS, the proper sentence remains one sufficient, but not greater than necessary, to “deter others from committing similar crimes, ensure the safety of the public, and avoid unwarranted sentencing disparities.” *Id.* Here, the requested non-guidelines sentence readily meets each of those sentencing goals; any additional time in prison would be greater than necessary.

C. Sentencing Mr. Ahmed to a Guidelines Sentence Would Create an Unwarranted and Inappropriate Sentencing Disparity

The sentence imposed by this Court must avoid unwarranted sentence disparities among similarly situated defendants. *See, e.g.*, 18 U.S.C. § 3553(a)(6); *United States v. Stevenson*, 834 F.3d 80 (2d Cir. 2016) (acknowledging requirement); *United States v. Frias*, 521 F.3d 229 (2d Cir. 2008) (same). The 20-year prison sentence suggested by the Guidelines, and urged by the government, would create such an improper disparity because it would be far greater than those meted out to others convicted of similar terrorism-related conduct.

For example, in *United States v. Delowar Hussain*, 19 CR 606 (S.D.N.Y.), Judge Stein, after trial, imposed a sentence of 7 years on a man intent on traveling to Afghanistan to provide material support to the Taliban while American military forces were still present in that country.

In *United States v. Dakhlalla*, 15 CR 98 (N.D. Miss.), the court imposed an eight-year sentence for conspiracy to travel abroad to join ISIS. Notably, in imposing that sentence, the court

specifically noting the defendant’s youth, lack of criminal history and contrition – three important factors that are equally present here.

In *United States v. Ahmed*, No. 1:15-cr-00049 (D. Minn.), the defendant was sentenced to ten years where he and others attempted to travel to Syria to join and fight with ISIS. In imposing that ten-year sentence, the Court noted that, while ISIS was “one of the most dangerous and violent terrorist organizations the world has ever known,” a 10-year prison sentence was sufficient to “deter others from committing similar crimes, ensure the safety of the public, and avoid unwarranted sentencing disparities.” *Id.*

Indeed, defendants convicted of far more egregious conduct than that committed by Mr. Ahmed still received sentences far less than the 20-year sentence the advisory guidelines calculate here. In *United States v. Thavaraja*, 740 F.3d 253 (2d Cir. 2014), for example, the Second Circuit upheld a nine-year sentence in a terrorism case where the defendant “*for more than six years* provided material support to a terrorist organization by purchasing on its behalf *more than \$20 million in deadly merchandise . . . used to injure, murder, maim, not only military but civilians.*” *Id.* at 260 (emphases added). Likewise, in *United States v. Stafford*, 2016 U.S. Dist. LEXIS 142752 (N.D. Ohio 2016), Stafford was a member of a domestic terrorist cell that conspired to attack various financial institutions, urban infrastructure, and police. One such target was a bridge located just outside of Cleveland. Stafford and his co-conspirators purchased fake C-4 explosives from an undercover FBI agent, planted the C-4 on the bridge, and attempted to detonate it by cell phone. For his crimes, Stafford received a sentence of ten years in prison.¹³

¹³ Cf. also *United States v. Juraboev*, No. 15-CR-95 (E.D.N.Y. 2017) (sentencing defendant affiliated with ISIS who schemed to bomb Coney Island to 15 years imprisonment); *United States v. Naji*, No. 16-CR-653 (E.D.N.Y. 2019) (sentencing defendant to 20 years for providing material support to ISIS outside and within U.S., including attempted Times Square truck bombing); *United States v. Abdin*, No. 17-CR-283 (D.S.C. 2019), *aff’d*, 801 Fed. Appx. 893 (4th Cir. 2020) (20 years for conspiracy to kill for ISIS both outside and within the United States; defendant trained with

Also informative is the case of *United States v. Samantha El Hassani*, prosecuted in the Northern District of Indiana. In that case, Ms. El Hassani, who was sentenced to 6 ½ years, not only travelled to Syria, she married an IS member and recruited others, including women, for her husband to use as slaves. She also allowed her son to be the poster boy in ISIS recruitment videos. *United States v. Samantha El Hassani*, 19 CR 159 (N.D.Ind.).¹⁴

Plainly, the requested sentence, which totals over 12 years of prison and supervised release time, fully accords with sentences meted out for efforts to join ISIS in Syria and similar offenses. By contrast, imposing a Guidelines sentence here would create an unwarranted sentencing disparity, especially given Mr. Ahmed's youth, lack of criminal history, obvious contrition, and demonstrated rehabilitation and attendant low risk of reoffending.

CONCLUSION

An individualized assessment of the § 3553(a) factors in this case (and the parsimony principle underlying federal sentencing) strongly support a non-Guidelines sentence of the more than five years already served, followed by an additional seven years of supervised release. Parveg Ahmed respectfully requests that the Court impose that sentence upon him.

and purchased weapons in support of that goal).

¹⁴ See also, Department of Justice. Office of Public Affairs, *Former Elkhart, Indiana Resident Sentenced to Over Six Years in Prison for Financing of Terrorism* (2020), at <https://www.justice.gov/opa/pr/former-elkhart-indiana-resident-sentenced-over-six-years-prison-financing-terrorism>

December 7, 2022

Thank you for your attention to this matter.

Respectfully submitted,

/s/

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Forensic Evaluation Report

Defendant: Ahmed, Parveg
Date of Birth: 6/15/1995
Arrest Date: 8/28/2017
Indictment: 17-378 (AMD)
U.S. District Court, Eastern District of New York
Report Date: 10/27/2022

INTRODUCTION and REASON FOR REFERRAL

Mr. Parveg Ahmed is a 27-year-4-month-old Bangladeshi born never married male currently housed at the Metropolitan Detention Center (MDC). Jordanian law enforcement detained the defendant on or about June 16th, 2017, in Jordan for Attempt to Provide Material Support to a Designated Foreign Terrorist Organization as defined in Title 18 United States Code §2339A(b) covering the period of 10/2014 and 6/2017 (ages 19 – 22). Mr. Ahmed was deported to the United States on or about August 28th of 2017 on charges of providing material support to the Islamic State of Iraq and al-Sham (ISIS). Mr. Ahmed pled guilty on 6/20/18 to Attempted Provision of Material Support and Resources to a Designated Foreign Terrorist Organization. Mr. Michael Schneider, on behalf of Federal Defenders of New York City, retained this examiner to re-evaluate the current risk for targeted violence pending sentencing proceedings.

COURSE OF EVALUATION

This examiner interviewed Mr. Ahmed on 10/7/22 and 10/20/22 for approximately 1 hour each visit at Metropolitan Detention Center, Visiting Room 1. This examiner reviewed the Forensic Report dated 6/28/21, included in Addendum A, reviewed records for that Report (Addendum B), and records since 6/21 listed in Addendum C. This examiner administered and interpreted the Personality Assessment Inventory (PAI).

INFORMED CONSENT

This examiner reviewed the purpose, scope, and course of the evaluation with Mr. Ahmed during the evaluative meetings. This examiner informed the defendant that the evaluation was requested by his Defense Attorney, that the findings of the evaluation were not confidential and would be used in

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the context of his current criminal matter, specifically sentencing scheduled for on or about December of 2022. Mr. Ahmed was reminded about the nature of the evaluation, including that it was not for treatment purposes and limits to confidentiality throughout the evaluative process. Mr. Ahmed agreed verbally to proceed.

RELEVANT UPDATES

Based upon the review of submitted records and current interviews, there are no relevant updates to the criminal matter currently pending for sentencing in December of 2022. This examiner directs to reader to review the Forensic Evaluation Report (Addendum A) submitted on 6/28/21 for a careful review of Mr. Ahmed's history, behavior and Findings.

Mr. Ahmed began outpatient mental health treatment, via video-tele-conferencing (VTC), on April 12th of 2021 and abruptly ended on or about 7/29/22. Dmitri Oster, LCSW (United Consulting Services, LCSW, PLLC) was the primary treatment provider. The defendant has not had additional treatment for an approximate three-month time period, however, was slotted to resume with a new therapist, in October 2022.

Mr. Ahmed began outpatient treatment on 4/12/21 "upon referral from the Federal Defenders of New York and as a DEEP participant." On 4/21/21, the defendant was noted as "forthcoming in discussing how his previous understanding of religion was hijacked by ideological fixations..." while on 4/27/21, disclosed details "surrounding his molestation at the hands of his older brother and other male family friends... between ages six-year-old and possibly later..." Toward the end of April, the treatment focused on how his reported traumatic history made him susceptible to being influenced by others. On 5/4/21, Mr. Oster wrote that Mr. Ahmed "does appear to have quite a rigid interpretations of Islam and the role of men and women in his religion." On 5/11/21, Mr. Oster noted that the defendant "does seem to have a better grasp on his own emotional monitoring..." On 5/25/21, Mr. Ahmed spoke of the onset of his alignment in 2014 with ISIS and on 5/28/21, asserted that "he firmly opposes Sharia Law."

Mr. Ahmed, on 8/10/21, discussed his removal "from his position of Imam and sermon-giver within his jail unit's Muslim worship group." On 10/1/21, he spoke about his pursuit of possible "coding (computer programming) training..." while on 11/19/21, was made the Imam again. On 12/10/21, Mr. Ahmed focused on "how the client can know that he will never engage in any form of extremist behavior again... Client very engaged in discussion..." On 12/17/21, Mr. Oster focused on the relevance of not overlooking personal accountability for his terrorism prevention plan in the context of his legal team's approach; "clinician believes it is also important for client to take full ownership of his past actions... client is open with this intervention." On 4/29/22, Mr. Ahmed focused on personal and interpersonal difficulties and about "how his abiding desire and intention to learn about his religion led him to jail and incarceration..."

Based on a Letter, authored by Mr. Oster in June of 2022, "Since beginning his treatment, client has presented as being open and honest in discussing his predicament and makes productive usage of his counseling sessions by reviewing and speaking about his past actions... appears to be taking measured steps to disassociate himself from all types of violent ideologically-driven and jihadi

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movements... committed himself to those actions vis-à-vis his positions (Imam) within the MDC and as an individual person of faith.”

On 6/24/22, Mr. Oster, for the first time, referenced that one of the attorneys was “incredibly antagonistic... entire dynamic is extremely disturbing and creates unnecessary negative influence in the working relationship... undermining the integrity of the counseling relationship.” Less than one month later, Ms. Oster (7/1/22) informed Mr. Ahmed that despite the therapeutic progress, “counseling work” would end due to “excessive and meddling interference...” The final treatment meeting was on 7/29/22.

During the current interview process, Mr. Ahmed reported being on no medication since the prior evaluation. He admitted to not having a treatment provider since on or about July of 2022 but characterized the treatment as helpful and disappointed by the abrupt end. The defendant indicated that he began with a new treatment provider, Lisa McDermott, LMHC, in mid-late October of 2022. He endorsed incurring no infractions in 2021 or 2022 and denied any kind of substance use.

His family continued to visit, with Fahim living in an apartment on his own (Manhattan) and the rest of the family continuing to reside in Queens. Alfie and Alvie attend college. He indicated that while the home remains in foreclosure, the overall financial situation has improved due to Fahim’s assistance.

Mr. Ahmed reported being “worried” about a possible return to the community. The defendant stated that he was prepared to be sentenced to prison terms prior to his release but hoped for a release to the community with supervision. If he returned to the community, he initially considered residing with his parents, however, subsequently admitted that residing at home would be problematic and could bring further negative attention to the family. Moreover, the conflict between his father and paternal uncle persisted and would serve a psychosocial stressor.

Mr. Ahmed, overall, reported improved relationships with his family members. When asked about the level of stress within his home, replied “some stress...” The defendant indicated that his relationship to his mother has improved the most, in particular, his asking for forgiveness for his criminal activity and some changes with his father, “I think I understand him better.” He cited that his father was reportedly sabotaged by the family, including Mahmud, and as such, has a skewed view, primarily negative, of those around him. He noted that his “dad was a bit kinder... even more patient.” Mr. Ahmed acknowledged that his behavior had a significant “negative impact on them... A lot of people look at them negatively...”

During the prior 18 months, Mr. Ahmed reported trying to marry on several occasions, either via his mother and/or inmates with no success.

Mr. Ahmed described himself as having “conservative” Islamic beliefs, including “adherence to religion... morals and relationships between males and females.” He specified that “I try to adhere to the law of the Quran” and served as an “informal” Imam while incarcerated. He denied ever trying to preach violence or an interpretation of the Quran for jihad or violence. In that light, he reported trying to write a book about the writings of Mohammed for the “average Muslim.”

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Mr. Ahmed clarified that his path of radicalization increased during the years of 2015/2016, when exposed to “people on Facebook, religious issues and more extreme views. I was less knowledgeable. I am now more knowledgeable and more tolerant...” He remembered exchanging messages regarding the “caliphate side of good...” referencing that while 3,000 died on 9/11, “more Muslims died than 3,000.” He characterized his statements as “foolish, suicidal. I was clearly misguided and confused.” He explained his behavior as “misguided, in my anger, in my emotions, very emotional, confusion, partially adventurous. An escape from my life, foolish. I truly regret it.” He further explained that the videos viewed during his process of radicalization were appealing “for two parts... ISIS was helping people, food and community. Saw them an extension of the piece of the mosque.” He cited a quote from the Quran as his current guiding principle, “Do not let the hatred of the people cause you to be unjust. Be just.”

Mr. Ahmed revised his plan, if released, to reside in a halfway house rather than home due to potential stressors within his family dynamics and “I don’t want to hurt their feelings.” He added that he could seek education/training for coding or computer programming and secure work, initially via a Contracting Company, but with the eventual transition to coding. Mr. Ahmed acknowledged that returning to the community would be stressful as he could be targeted by community members.

BEHAVIORAL OBSERVATIONS and TEST DATA

Mr. Ahmed is a 27-year-old Bangladeshi male who was neatly kempt and dressed in prison issued brown clothing and wearing a surgical mask. He spoke in a slow and audible manner, answered all questions posed and maintained good eye contact. Mr. Ahmed’s affect was appropriate to content although somewhat restricted. Similar to his prior presentation, there was no evidence for depressed mood. His attention, concentration and memory were good. His thinking was organized and demonstrated no instances of delusional or manic thought processes.

Relevant Testing Instruments

Personality Assessment Inventory (PAI)

The Personality Assessment Inventory is a self-administered, objective inventory of adult personality designed to provide information on critical clinical variables. It contains 4 validity scales, which assess response style, 11 clinical scales, 5 treatment scales, and 2 interpersonal scales. The Personality Assessment Inventory should not be used alone to make a diagnosis, as further collaborate historical and observation data are required.

Mr. Ahmed’s overall validity profile was consistent with an individual who attempts to present himself in an overly favorable manner, but not to the extent to invalidate the findings/testing. He is likely reluctant to acknowledge personal limitations, deny internal distress and minimize problems.

Mr. Ahmed did not significantly elevate any clinical or clinical sub-scale. However, his overall profile is consistent with an individual who is likely to experience a lack of empathy, harbor undue suspiciousness and exhibit impulsivity, depression and problematic behaviors to manage marked anxiety. He denied any significant problems with alcohol and/or drugs.

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CONCLUSIONS

It is this examiner's opinion that Mr. Ahmed, based on the integration of the prior and current assessment process, currently poses a low risk for further terrorist targeted violence.

As indicated in the prior report, Mr. Ahmed's seeds for terrorist targeted violence emerged in the context of a dysfunctional family, undiagnosed mental health problems, social/intimate relationship deficits and escalating failures across multiple domains. The defendant created a false hope to distract himself from a rutter less existence. His own failures fused with those of ISIS, contributed to an escalating threat where he moved from reportedly attending a lecture with an Imam, to finding information about a Canadian who fought in the Jihad, posting his own digital material which grew in frequency over a two-year period to attempting to enter Syria from Jordan in the summer of 2017, with the intent to fight and join an extremist group.

In this examiner's opinion, Mr. Ahmed made good use of his treatment with Mr. Oster, understanding his pathway behaviors and triggers to the process of radicalization. Moreover, the treatment records reflected an appreciation of how his family factors led to his offense and increased responsibility for his behavior. Unfortunately, this successful process was abruptly disrupted and cut short in the summer of 2022. During the current interviews, he appears realistic regarding his risk and seems to grasp, albeit hesitantly, that returning to his family is a potential stressor.

In this examiner's opinion, Mr. Ahmed's current low risk for targeted violence can be managed via continued outpatient treatment, employing supportive cognitive-behavioral tactics, alongside supervision and residing in a half-way house prior to residing on his own. This examiner does not recommend a return to his home in Queens given the unstable environment. Mr. Ahmed remains receptive to 1:1 counseling but the process, as indicated in the prior Report, will be slow as he tends to present himself in an overly favorable light. Moreover, his eagerness to marry should be carefully monitored as it may serve as a further psychosocial stressor. It remains this examiner's opinion that a pharmacological assessment and/or intervention be considered to manage emerging depressive and anxiety related symptoms. Finally, the participation of a substance use program is strongly recommended.

The opinions above reflect the information available at the time of the completion for this Report and may be subject to modification should additional information be made available.

Signed this date October 27th, 2022, in New York City, New York

Respectfully Submitted,



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Addendum A

Forensic Evaluation Report

Defendant: Ahmed, Parveg
Date of Birth: 6/15/1995
Arrest Date: 8/28/2017
Indictment: 17-378 (AMD)
U.S. District Court, Eastern District of New York
Report Date: 6/28/2021

INTRODUCTION and REASON FOR REFERRAL

Mr. Parveg Ahmed is a 25-year-10-old Bangladeshi born never married male currently housed at the Metropolitan Detention Center (MDC). Jordanian law enforcement detained the defendant on or about June 16th 2017 in Jordan for Attempt to Provide Material Support to a Designated Foreign Terrorist Organization as defined in Title 18 United States Code §2339A(b) covering the period of 10/2014 and 6/2017 (ages 19 – 22). Mr. Ahmed was deported to the United States on or about August 28th of 2017 on charges of providing material support to the Islamic State of Iraq and al-Sham (ISIS). Mr. Ahmed pled guilty on 6/20/18 to Attempted Provision of Material Support and Resources to a Designated Foreign Terrorist Organization. Mr. Michael Schneider and Ms. Sabrina Shroff, on behalf of Federal Defenders of New York City, retained this examiner to conduct a forensic evaluation centered on threat assessment pending sentencing proceedings.

COURSE OF EVALUATION

This examiner interviewed Mr. Ahmed on 11/17/20 for approximately 1 hour, 12/15/20 for approximately .75 hours, 12/23/20 for approximately 2 hours, 12/30/20 for approximately 1 hour, 1/13/21 for approximately 2 hours, 1/20/21 for approximately 1 hour and 4/7/21 for approximately 30 minutes, all instances via VTC. The records reviewed are listed in Addendum A. This examiner administered, coded, and interpreted the Terrorist Radicalization Assessment Protocol – 18.

INFORMED CONSENT

Ahmed, Parveg (6/15/1995)

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This examiner reviewed the purpose, scope, and course of the evaluation with Mr. Ahmed during each evaluative meeting. This examiner informed the defendant that the evaluation was requested by his Defense Attorney, that the findings of the evaluation were not confidential and would be used in the context of his current criminal matter. Mr. Ahmed was reminded about the nature of the evaluation, including that it was not for treatment purposes and limits to confidentiality throughout the evaluative process. Mr. Ahmed agreed verbally to proceed.

INSTANT OFFENSE (Based on Record Review)

Based on Eastern District of New York Indictment Cr. No. 17CR-378, Mr. Ahmed, on or between 10/2014 and 06/2017, “did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b)... to a foreign terrorist organization... the Islamic State of Iraq and al-Sham (“ISIS”)...” The defendant and co-accomplice, RM, were arrested in Jordan prior to extradition to the United States on or about August 28th of 2017.

Based on the United States District Court of the Eastern District of New York Case Review 17M643 (7/17/17; authored D. Brown), Mr. Ahmed was first detained on 6/16/17 in Jordan as he and RM attempted to travel to an ISIS occupied territory to “provide material support and resources to ISIS.” On or between 10/13/14 and 3/3/15, the defendant utilized Twitter to tweet “multiple messages in support of ISIS...” including “Who are the Jihadis? Muslims who fight to establish Sharia IN THEIR OWN LANDS, wanted the MAJORITY of the people. USA are the real terrorists.” On or about 2/21/15, he posted “The side of Good is Islam & the Caliphate If you’re not with the Muslims, you’re ignorantly, irrelevantly, & arrogantly on the side of Evil.”

Based on the FBI Case Files (1/27/16), federal agents interviewed Mr. Ahmed, on 1/27/16, at JFK following his return from attending two weddings in Sylhet, Bangladesh. His usernames/emails included yank5freak@aol.com, Abdullah, and Abdullah Ahmed. He reportedly stopped using Twitter on or about ten months earlier or March-April of 2015. During the interviews in 2016, Mr. Ahmed denied posting pro ISIS or pro Jihadi material on social media, but when confronted, acknowledged posts that led him to leave social media; “and that he knew he was going to wind up in trouble if he remained on Twitter.” He acknowledged an initial interest for ISIS after learning of a Canadian fighting for ISIS, “a low point in his life when he was following these individuals.” Mr. Ahmed denied the significance of his posts, attributed his behaviors, in part, to his marijuana use and hoped to travel to Saudi Arabia to study at Medina University, majoring in Islamic Studies. At the time of the interviews, the defendant denied looking up bombing and firearm material, owning weapons and had no military training. Moreover, he reportedly had “no desire to fight for any type of Jihadist or terrorist group...” He reportedly acknowledged being diagnosed with anxiety but not medicated. Based on the FBI Case Files, he reportedly attended Baitul Mamur Masjid Community Center in Brooklyn, NY.

Based on the United States District Court of the Eastern District of New York Case Review 17M643 (7/17/17; authored D. Brown), Mr. Ahmed (on or around 2016) “attempted to convince his family to move to the region in the Middle East were ISIS currently controlled territory.” At some later time, he reportedly conveyed to his brother “that ‘there was legitimacy to [ISIS’s] violence upon people.’” This brother reportedly witnessed the defendant observing “ISIS video involving

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the burning of individuals to death.” Based on the records reviewed, Mr. Ahmed travelled to Saudi Arabia, on or about 6/1/17, along with 2 other family members and accomplice to “ostensibly to celebrate Ramadan.” On or around 6/9/17, he and the accomplice reportedly were to remain at home while the family members were going to attend a mosque; but upon their return, both the defendant and accomplice were not home. The last contact with the family (mother) was on 6/14/17. On or about 6/20/17, his brother reported that the defendant, prior to leaving for Saudi Arabia, “attempted to erase all of the files stored on the SUBJECT PREMISES.”

Based on the United States District Court of the Eastern District of New York Affidavit in Support of an Application (8/27/17; authored J. Ross), Mr. Ahmed viewed “recordings of sermons of Anwar al-Awlaki...” and a “lecture by Abudullah el-Faisal, entitled ‘The 9 Reasons Why the Kuffar Hate the Believers’...” Abudullah el-Faisal was an Islamic cleric, found guilty in the United Kingdom, for solicitation to commit murder, preaching that followers kill individuals, including Americans, because they were deemed the enemies of Islam. Mr. Ahmed’s computer search yielded that he “researched and reviewed materials describing a method to erase data on the Computer... also previously researched how to delete a social media platform...” Based on the same records, RM (on or about 8/25/17) indicated that he and Mr. Ahmed “travelled by cab from Saudi Arabia to Amman, Jordan; upon arriving at a hotel, AHMED call for a cab to Idlib – an area in Syria presently under insurgent control, however, may have meant ‘Irbid – another city in Jordan.’” Based on the same document, the defendant and RM “spent the night before RM’s interview together in a holding room for non-residents. Based on this information, I believe it is likely that AHMED and M. coordinated their stories in advance of any possible interviews with the FBI.”

Based on the United States District Court of the Eastern District of New York Affidavit in Support of Arrest Warrant – 17M766 (8/28/17; authored J. Ross), Mr. Ahmed, on or about 3/3/15, “tweeted ‘The war on the Islam State is a war of the ideologies; Democracy/Capitalism v. Shariah Media propaganda/lies vilifying the enemy ‘ISIS’.” Based on these records, on 7/17/17, the Honorable Steven L. Tiscione (US. Magistrate Judge for the Eastern District of New York) authorized the execution of a Search Warrant for the defendant’s computer. Based on this search, the defendant viewed/read statements in support of ISIS, jihad, travelling to join ISIS and justification of violence towards those who are unbelievers. Based on his phones, he was “attempting to travel to ISIS-controlled territories in Syria in order to wage violent jihad.” Phone images included “a picture of five men hanging by their necks with the caption ‘gay men to be hanged’ as well as “texts justifying attacks on the World Trade Center and a picture of the leader of ISIS, Abu Bakr al-Baghdadi.” On or about 6/9/17, his phone included a message (not yet sent) to a “third party, ‘In Saudi looking for hijra’.” On or about 6/15/17, Mr. Ahmed reportedly wrote “[W]e have made it to Dawlatul Islam [ISIS] in Syria. In sha Allah... we will join the Jihad very soon and in Sha Allah [God willing] we will then join the ranks of the Shuhuda [martyrs]. The West has invaded the land of the Muslims and is constantly attacking it.” On or about 6/15/17, he reportedly wrote a “farewell” note (not sent) of “forgive me if I was harsh/overbearing. Please remember that I tried to teach you.” On or about 6/16/17, the internet browsing history included “BBC news article entitled ‘Islamic State and the crisis in Iraq and Syria in maps’ and a visit on June 17, 2017 to website for an ISIS ‘live’ map...”

Based on the United States District Court of the Eastern District of New York Application for a Search Warrant for Information in Possession of a Provider (Facebook Accounts) (9/22/17;

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authored Leo McFarland), Mr. Ahmed logged into Facebook “multiple times between June 1, 2017 and June 15, 2017, during which time Ahmed was en route from New York to Saudi Arabia, from Saudi Arabia to Jordan, and through Jordan in hopes of crossing the border into Syria.”

The United States Department of Probation Eastern District filed a Presentence Investigation Report on or about 3/11/19 (authored by Jaime L. Turton). Based on this Report, Mr. Ahmed “took the lead in planning and organizing the trip... instructed the co-conspirator to sell his Xbox gaming system for \$200 in order to raise money for the men to purchase a ‘smart’ cell phone.”

RELEVANT HISTORY (based on record review and interviews)

Mr. Ahmed was born in Sylhet, Bangladesh to Asma Begum (5/1976) and Abdul Hannan (12/26/1960) who are married for 27 years and reside in a 2-family-owned home in Ozone Park, New York. The father works as a “Tax Preparer” and mother is not employed. The defendant’s older brother, Fahim (d.o.b., 6/8/1994) recently returned home from Atlanta, due to COVID-19, remotely works in the Technology Field. The defendant’s younger brother, Ashfaq (4/28/1999), works in IT. The defendant’s youngest brother Alvie (12/11/2000) attends the New York College of Technology. All three brothers are not married and live at home. The defendant never married, fathered any children nor has had any intimate relationship.

Developmental and Family of Origin History

Mr. Ahmed reported that his father immigrated to the United State to improve his economic and employment situation and within six months brought the entire family (Ashfaq and Alvie were born in the U.S.). The defendant recalled that he returned to Bangladesh and then back to the United States at or about two years of age. His mother tongue is Bengali, currently only speaking Bengali with his parents. He learned English while attending school in the United States. While in Bangladesh, he resided with his paternal uncle.

Mr. Ahmed initially characterized his household as a “peaceful quiet place” and family shared the 2-family home with his paternal uncle (Mahmud). Upon further questioning, however, the defendant painted a picture of a verbally/psychologically and physically abusive father and mother.

Mr. Ahmed explained that his father would become physically abusive, beginning on or about the 6th grade. He characterized his father as “strict but loving” who pushed the children academically, was infrequently satisfied with their overall performance, despite excellent grades. He recalled that his father demonstrated “verbal tirades.” The defendant recalled that his father’s behavior reportedly changed following his paternal grandmother’s death on or about the spring of 2008. The paternal grandmother’s had come to live with the family and died six months later. Mr. Ahmed believed that his father suffered with depression, lying in bed for one to two months, crying and ceasing to work subsequently followed by “verbally abusive and angry” behavior. The defendant explained that his father targeted his mother referring to her in derogatory manners, asserting that he should have never married. He added that his father characterized him as “weird” due to his appearance, hygiene, intellect and abilities. During one instance, his father reportedly “took a book and slapped me across the head twice.” The defendant estimated that the physical abuse stopped on or about the 7th grade as he developed physically; however, the verbal tirades persisted.

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Mr. Ahmed explained that his mother was not affectionate-verbally warm; rather focused on meeting the basic needs of food and clothing. He characterized her as more of a physical disciplinarian and “putting me down” by repeatedly comparing her to his older brother, Fahim. The defendant added that she repeatedly and consistently referred to him as “stupid,” commented on his weight and suggested that he would not live up to his older brother. He characterized her behavior as bullying, degrading and would engage in such behavior in public. Mr. Ahmed recalled that since age 5/6 until age 12/13, she used plastic hangers and tree branches/switches to strike him on his body, primarily arms, at times leaving welts/marks/bruises, “serious enough to make me cry.” He denied that ACS was involved, however, ACS did investigate the family for Education Neglect (linked to younger brothers attending Masjid).

Mr. Ahmed reported travelling to Bangladesh at age 11, at which time, he and Fahim were circumcised. When asked what prompted the procedure, including possible religious or cultural reasons, explained that his paternal grandmother did not want the circumcision done immediately following their birth. He recalled that he entered a medical facility on an outpatient basis and his mother was the person responsible for wound care, placing ointment/lotion to ensure proper healing and recovery to the penile area. He characterized this time as awkward and strange to have his mother touch his penis over an extended period as he transitioned to puberty.

Mr. Ahmed explained that his father and paternal uncle (residing in same 2-family home) frequently verbally and physically argued, to the extent that Law Enforcement (LE) responded to 911 calls. The arguments centered on the ownership of the Ozone Park home. Mahmud, the paternal uncle, resided upstairs with his family, often yelled and “curse, throw stuff at each other. Once, my paternal uncle called the police and my father went to the hospital for an evaluation, I think Jamaica Hospital.” He estimated that this incident occurred on or about March of 2017. The defendant recalled escorting his father, via ambulance, to the Emergency Room where he was reportedly admitted and discharged. Mr. Ahmed explained that the reported March 2017 incident was preceded by an event on or about October 2016. At that time, the NYPD arrested Mahmud following a verbal/physical dispute with his brother.

Mr. Ahmed recalled that, in 2012, Mahmud’s wife or paternal aunt, reportedly brandished a machete, threatened the defendant’s father and family and “stabbed the door a couple of times.” When the NYPD arrived, the aunt fled but “my family made me run after her as she was running in the street.”

Mr. Ahmed explained that Mahmud first came to this country illegally, became an American citizen followed by his brother’s arrival. The defendant characterized his paternal uncle as “very mean” directing verbal tirades toward his family, and during one instance, inserting his finger into his mouth and “ripping my gums” after he and his brother made noise to prevent him from sleeping. He added that Mahmud’s wife possibly suffered from some type of mental illness, prompting prescription medication and overnight stay at an inpatient psychiatric ward on or around 2012. Mahmud and his wife have three children, all residing in the home, Farhan (age 17), Tanvir (age 14) and Tahmid (age 8).

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Mahmud and defendant's father reportedly purchased the Ozone Park home on or about 2003. Mr. Ahmed reiterated that arguments centered on finances and ownership status, leading to economic distress. Their home is currently in foreclosure status. The defendant further explained that his father needed to file for bankruptcy due to excessive credit card usage on or about 2008/2009.

Mr. Ahmed recalled that his relationship to his oldest brother, Fahim, became strained during his early teenage years when they verbally argued which led Fahim to reportedly throw the defendant to the ground. His younger brothers, Ashfaq and Alvie, were home schooled for several years (onset 4th or 5th grade) attending Baitul Mamur Masjid in East New York, memorizing and learning the Quran. They attended about five years before eventually being transferred to a Public School.

Mr. Ahmed recalled reverting to reading mystery and fiction books as a method to manage the reported escalating family dysfunction, however, maintained few personal relationships at school or neighborhood.

Academic History

Mr. Ahmed attended Lewis Munoz Elementary School in Bay Ridge Brooklyn from Pre-K until the 3rd grade, P.S. 232 in Queens for the 3rd – 6th grades, M.S. 210 in Ozone Park for the 7th and 8th grades and Stuyvesant H.S. for the 9th through 12th grade. The defendant earned his H.S. Diploma in the summer/fall of 2014 with a self-reported g.p.a of on or about "66 or 67." Based on the Presentence Report, his overall H.S. g.p.a was 65.95% while on or about 4/3/13 – 4/5/13, he cut classes, entered the cafeteria without permission, refused to leave when asked prompting parental intervention and guidance intervention.

Mr. Ahmed described himself as a top student during his elementary and middle school years. The defendant reported being bullied during the latter years of elementary school into M.S. due to his cultural background, beginning on or about the 2nd half of the 7th grade and ending toward the latter portions of the 8th grade. His social relationships at school remained minimal. He recalled being referred to as "Parfag" or having "Parfag germs" and other terms; however, "I kept quiet."

Mr. Ahmed described a deterioration in his overall academic performance when attending Stuyvesant High School. The defendant repeated a portion of his 12th grade year due to earning "F grades." He began "cutting classes" and during his early High School years, initiated his use of marijuana and alcohol (see below). Mr. Ahmed reported that his grades deteriorated rapidly during his 9th grade year, endorsing feeling "stupid" in part due to lack of studying and "I thought studying was for stupid people." In addition, the defendant endorsed suffering from a "depression" characterized by feeling "stupid" and "feeling bad" with "some thoughts, not of killing of myself, but I wouldn't mind if a car hit me."

Mr. Ahmed reported that by end of his 9th grade year, his focus shifted to his appearance, purchasing sneakers, socialization and being with similar age girls, none of which led to an intimate relationship. By the 11th grade year, he missed school on a regular basis, at times to attend "Day Jam Parties" held during school hours. At other times, he remained home sleeping well into the afternoon.

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Mr. Ahmed reported having four separate fights with three different similar age males during the spring of his 11th grade year. The first fight was reportedly in response to having items stolen from him (electronics and alcohol) and being “insulted on Facebook.” This reportedly prompted an after-school confrontation. The defendant recalled injuring the juvenile male, leaving him with a bloody nose and himself suffering a broken pinky. The second fistfight occurred on a basketball court in the neighborhood when intoxicated, where he suffered a broken hand. The third and fourth fight were with the same person, who reportedly stole the defendant’s electronic devices.

Mr. Ahmed reportedly began to attend Hunter College, prior to a formal H.S. Graduation, in the Spring of 2014 as Hunter College was not aware that he had not yet graduated. The defendant graduated H.S. in the summer of 2014 after attending Summer School. He left Hunter College in 2015. The latter departure reportedly may have been due to a possible expulsion for a low g.p.a. Mr. Ahmed reportedly attended LaGuardia Community College for one semester during the spring of 2016 and New York City College of Technology in the fall of 2016. He departed the latter location on or within one semester. Based on the FBI Case Files (2016), the defendant was expelled from Hunter in June of 2015 “for a grade point average of 1.9. He lost his student aid because of his low-grade point average.” The defendant explained his poor academic performance to “I never learned how to study. I used to do my homework, take the test and get perfect grades.”

Employment History

Mr. Ahmed reported that his longest term of employment was with the Masjid working as a “tutor” for English and Mathematics for 2013-2015, earning on or about \$17 per hour. He reported working for Varsity Tutoring as an “independent contractor” travelling NYC for mathematics and English. He also worked for American Eagle on or about 2015-2016 but left when departing for a wedding in Bangladesh in 2015/2016. Finally, he worked part-time assisting his father’s firm, FRS Tax & Multiservice.

Relationship – Sexual History – Including Reported Sexual Abuse

Mr. Ahmed reported two instances of child sexual victimization, the first occurring on or about five years of age, the second on or about age 10. During the first reported instance, the defendant recalled that while asleep or possibly asleep, next to his brother Fahim (shared bed), his brother touched his genitalia but then retracted, “Maybe I disassociated.” The reported second instance was at the hands of a juvenile male family friend of Fahim while in their living room, where the person reportedly “put their hand down my pants. I reacted negatively and I left the area... I think I pushed his hand away.” He recalled that Fahim was in the room and did not respond; “I suspect that he may have been part of it. I try to forget for so long. I am not sure about Fahim.”

Mr. Ahmed reported first viewing pornography, naked images of celebrities on or about age 11/12, first masturbating to ejaculation at or about age 12/13. He used a family computer in a common area, and at one point, his older brother threatened to inform his parents about his viewing of images leading him to feel “very depressed for a while.”

Mr. Ahmed reported that during grade 8, he experienced his first romantic interest to a similar age girl, Tamanna. He explained that they “flirted all the time” with no sexual or genital contact. He

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recalled during one instance sitting with a group of persons when the same girl reached beneath the table and placed her hand on his leg moving upward toward his genital area. The defendant recalled that he pushed her hand away due to reportedly having a “flashback. I cringed. I threw her hands away from me. The relationship was never the same again.” When questioned about the “flashback” referenced his reported instance of victimization on or about age 4-5.

Mr. Ahmed reported having no dating, intimate or sexual relationships with males or females. He identified as heterosexual. He reportedly asked one girl on a date during High School while in a separate instance, a similar age female, Ishrath, attempted to kiss him in a school stairwell, leading him to “panic, almost blacked out.” In another instance, another girl “was aggressive, she rubbed herself on me, at school and told me that I was handsome.” In yet another instance, the defendant went on a date with a similar age teenage female, Raisa, but nothing became of this relationship. He recalled that while being “friendly” and “popular” at school, was unable to begin or initiate a relationship.

Mr. Ahmed further explained that during his sophomore H.S. year, beginning to attend “Day Jam Parties” during school hours. At these parties, he met with “Hispanic girls who I was extremely popular with. We would get high and drunk before the parties. When there, there would not be much conversation. We would dance, grind and make out, fondling without really knowing the person.” This continued in subsequent years when he reported attending similar parties in Astoria, Queens with Bangladeshi females, “the same thing would happen.” He denied sexting or exchanging pornographic material. He denied attending strip clubs.

When asked about his reported “anxiety” around women, Mr. Ahmed explained that his lack of dating/seeking out females was linked to developmental setbacks from his mother, who he characterized as meeting basic food and clothing needs, but “never paid much attention to us. She never hugged or kissed us. She did everything for me but didn’t teach me how to do things.”

Mr. Ahmed endorsed on or about ten instances of engaging in oral sex, genital fondling and kissing with prostitutes, on or about the age of 21. He secured the prostitutes via “Backpage.” The defendant added that by 2013, he located a site called “nofap” which encouraged him to stop viewing pornography and masturbating. He estimated that by 2013, reportedly viewing pornography on a “daily basis” and “masturbated daily” via one site, xnxx.com. He endorsed viewing adult pornography, preferably Latina women. The defendant explained that he stopped viewing pornography when “I became religious” which he equated to the summer of 2014 or June of 2014.

Criminal and Incarceration History

Mr. Ahmed recalled being arrested in Jordan on or around June 16th of 2017 and transferred to the United States on or about 8/28/2017. There are no prior documented or reported arrests.

Neurological Problems

None noted or documented.

Psychiatric History

Mr. Ahmed endorsed the presence and emergence of anxiety and depression about 16 to 17 years of age. He characterized his anxiety as “extreme nervousness, feelings in my chest and in social settings, especially around females.” He reiterated that most of his “anxiety” is around “women and girls.” He added that he experienced moments of “suffocating” on the train. Based on the Presentence Report, on or around 2012, he reportedly was diagnosed with anxiety with no prescribed medication. Mr. Ahmed endorsed suffering from a “depression” characterized by feeling “stupid” and “feeling bad” with “some thoughts, not of killing of myself, but I wouldn’t mind if a car hit me.” On or around the 11th grade, he reported sleeping extensively into the afternoon prompting him to miss school. He believed that his reported sexual victimization contributed to anxiety and depression.

Substance/Alcohol Use History

Mr. Ahmed endorsed using marijuana, benzodiazepines, hallucinogens and OTC medication as well as the use of alcohol. His primary drug was marijuana. The defendant first used marijuana on or about the 9th grade – age fifteen (2nd semester) with his last use of December of 2016. He sold marijuana from January of 2013 until June of 2014. He primarily smoked “joints” and “blunts” but could not specify the type of marijuana used; “whatever was available.” Within a short period of time, the defendant explained that he smoked daily, began during the morning hours, including while at school prompting at least one instance of the Dean searching him to determine if he possessed marijuana. Mr. Ahmed recalled an additional instance of the NYPD searching him while at Stuyvesant H.S. The defendant generally smoked with a group of people, but as his use escalated (approximately a “nickel” bag per day), he transitioned to using alone. He paid for the drugs by working as a “tutor” in mathematics, English and helping to prepare students for specialized H.S. exams. The defendant endorsed relapsing, after he stopped in June of 2014, in December of 2016 after stressors linked to attempting to live on his own and engaging in soliciting prostitutes which he characterized as developing into an addiction; “I was ashamed as soon as I finished.”

Mr. Ahmed first used alcohol on around the 10th grade (2nd semester) with his last use in January of 2014. He explained using “whatever” alcohol was present. He estimated his worst use was during Senior Year in H.S. and included passing out on a subway platform. The defendant indicated that the NYPD and EMT transported him to the Emergency Room where his parents were informed, for the first time, in a formal manner of the extent and chronicity of his use.

Mr. Ahmed used benzodiazepines, specifically Xanax, for a short period of time or in 2013 (12th grade year). He reported using Adderall for a short period of time (5 instances in total). The defendant reported using hallucinogens (LSD, Shroom) beginning during his 11th grade year until on or about June of 2014. He characterized his worst use during his junior H.S. year. Finally, the defendant reported using Robitussin/NyQuil/Codeine for the first time on or about 2011 and ending on or about 2013.

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Substance/Alcohol Abuse & Psychiatric Treatment History

Mr. Ahmed reported a short duration (2-3 months) of attending outpatient treatment with what he believes, was a psychologist in Jamaica, New York. When asked why he left, replied “I quit. I felt it was not being effective and the appointment was early on Saturday morning.” The defendant reported no formal substance/alcohol abuse treatment.

Radicalization Process

Mr. Ahmed reported that a friend, at the local Brooklyn Masjid, on or about 2013/2014 encouraged him to attend events sponsored by the Muslim Student Association (MSA) of Queens College. In June of 2013, the defendant made a conscious effort to alter his lifestyle given reported failures at school, intimate relationships, work and use of drugs. On or about January of 2014, he attended an event listening to an Imam lecture on Islam and possibly “religion having the answers.” Mr. Ahmed explained that within an approximate 5-month period or June of 2014, he entertained (during Ramadan) the possibility of returning to religion to help change his lifestyle, including the sustained use of drugs/alcohol, failing academics and conflict with his family of origin. He reiterated that the Imam’s words “resonated with me” specifically a discussion about the Pakistani-Indian conflict and of the importance the Quran on limiting arrogance.

Mr. Ahmed reported that in June of 2014, he stopped trimming his beard, deleted music from his electronic devices and discarded his drugs/drug paraphernalia. In the summer of 2014, he viewed a VICE News Program about a Canadian who pledged his allegiance to ISIS and resided in ISIS controlled territory. He reportedly subscribed/read this individual’s Twitter page which led him to watch ISIS sponsored videos. He described these videos as being part of a long compilation/series (The Light Series) summarizing the good work of ISIS but of also making negative comments about the United States. Mr. Ahmed admitted to making his first post on a social media platform, Twitter, on or about the fall of 2014. When questioned as to what motivated him to post on Twitter, replied “I wanted to be a true believer, I wanted my friends to understand that ISIS has good people, they do good things.” At the time of the post, he was attending Hunter College.

Mr. Ahmed reported first thinking about travelling to territory occupied by ISIS on or about 2014 to 2015; “kind of thought, contacted someone who could get me in, from a website, but he told me the site was for people who are serious about it. I was not serious about it in 2015.” When asked what would have occurred if the persons placed additional pressure to travel, replied “No, not at that time. I was immature. I didn’t know about travel.” Mr. Ahmed reported that he met his fellow accomplice (RM) in the spring of 2016 at the local mosque, a person of Bangladeshi background but born in the United States.

Mr. Ahmed reported that in 2017, he travelled within NYC as a tutor; “maybe gave me more comfort, but it was also a desperate moment in my life.” When asked about “desperate” explained that he was attempting to marry during the first several months of 2017 via “Muslim marriage websites... here in NYC.” On or about February to April of 2017, there was one female that held

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the potential for marriage. In April of 2017, “I had already made plans” with his father and uncle for “umrah.”

Mr. Ahmed indicated that he travelled from Saudi Arabia to Jordan via taxi. Initially, he frequented a bus depot to travel to Amman, Jordan but was informed that the bus was to leave in several hours, thus procured a taxi. He recalled that the taxi drove him and his accomplice to the border, at which time they happened to meet someone who spoke Bengali who then helped them cross the border after completing VISA related paperwork and paying border fees.

When asked about his plan in Saudi Arabia, Mr. Ahmed referenced going to Idrib in Jordan, but upon repeated questions, acknowledged the intent to travel to Syria to “join, go into ISIS territory. See how we can help. Soldier training camps, to fight with them, to take orders about whoever they tell us to fight, the Syrian Army.” Mr. Ahmed repeatedly denied hoping to serve a “suicide bomber” but “to stay as a regular soldier, die as a soldier in ISIS territory. We were going to South Syria bordering Jordan.”

Mr. Ahmed reported that once in Amman, spending one evening in a Hotel before being apprehended. He indicated being under surveillance and arrested within two days of arrival in the hotel lobby. When pressed about his reasons for becoming a “soldier” in Syria, replied, “Obama was a dictator, using chemical weapons on people.” When pressed further, he indicated that he wanted to help implement “Sharia Law, believing in the system, the goodness and knowing that sacrifices to be made to create the system, to worship Sharia.” He added that by implementing “Sharia Law, there would be peace, prosperity, justice, Utopia on earth.”

Mr. Ahmed repeatedly asserted that he had no prior access to any types of weapons, knives, guns, semi-automatic weapons, bomb making or IED material. He denied reading any books in these areas. The defendant confirmed that definitive planning crystallized in late 2016 to early 2017 but denied making any videos pledging allegiance to extremist groups.

Post Arrest

Mr. Ahmed entered MDC on or about 8/28/17. Based on the U.S. Probation Department records, following his admission, the defendant incurred three disciplinary tickets (refusing work program, 11/28/18; refusing to obey an order, 11/26/18; possessing a dangerous weapon (sharpened toothbrush, 1/8/18).

Based on the current evaluative process, Mr. Ahmed, when asked about the Interrogation Video, replied “still not sure about what I was being arrested for...” but recalled reading a book called “Raw Law” which instructed persons arrested to not speak to law enforcement and request an attorney; “If booked by the Police, don’t tell them anything. Not share anything with them.” He characterized himself as not cooperative and intent on learning about the evidence against him before meeting with his attorney.

Mr. Ahmed asserted that many of his problems/concerns were resolved, including his reported “porn addiction” via the use of abstinence, while additional problems such as poor sleeping/eating

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habits, “anger toward women” and “anger” toward parents were resolved via reading passages in the Quran.

Mr. Ahmed, when reminded about his arrest behavior, replied “I guess that would be an issue, terrorism... biggest one.” He indicated reading from the Quran and utilizing the writings to intellectualize and understand how he distorted and misinterpreted texts and grew susceptible to misinformation. When asked about his perception of his own risk to return to the pathway that led to his arrest, Mr. Ahmed replied “I don’t think there is any risk at all...” When he was pressed further, given behaviors leading to arrest, replied “yes, right, some risk. If you really got to know me, there is no risk. I changed completely.” When asked about potential risk factors, the defendant explained “I don’t think there is anything. I understood what happened...” He reasoned that his radicalization process began when exposed to “propaganda videos” and that he “lacked knowledge.” He cited failed school and relationships and possible depression as additional factors leading to radicalization process, “I had nothing to lose.”

Mr. Ahmed reported being receptive to outpatient mental health programming although he repeated that he no longer dealt with depression and anxiety. He specified that he could utilize help with developing “emotional empathy” to foster intimate relationship as well as help managing reported abuse at the hands of his family. When pressed regarding medication, replied “I don’t think so. I am not dealing with anxiety and depression.” When pressed again on possible barriers or obstacles that could have him to return to extremist groups or ideas, replied “only thing would be very personal thing. Sometimes relationship not meshing.”

BEHAVIORAL OBSERVATIONS and TEST DATA

Mr. Ahmed is a 25-year-old Bangladeshi male who was neatly kempt and dressed in prison issued clothing. He remained cooperative throughout the evaluative meetings and responded to all questions. He maintained good eye contact, spoke in an audible and slow understandable manner. Mr. Ahmed’s affect generally remained flat and there was no evidence for depressed mood. His attention, concentration and memory were good. His thinking was organized and he demonstrated no instances of delusional or manic thought processes.

Relevant Testing Instruments

Terrorist Radicalization Assessment Protocol – 18 (TRAP-18)

The Terrorist Radicalization Assessment Protocol is a structured professional judgment instrument for assessing risk of terrorist violence across the entire spectrum of ideologically motivated individuals, whether jihadists, right-wing extremists, or single-issue perpetrators. The TRAP-18 consists of 8 proximal warning behaviors and 10 distal characteristics and can be operationally used by threat assessors in the intelligence, law enforcement, and mental health communities to prioritize cases. The TRAP-18 is not an actuarial measure of violence risk and should not be “scored.” The indicators are coded as either present or absent if there is sufficient evidence to make this determination. The final determination of risk for terrorist targeted violence is made by the evaluator based on the coding of 18 Items. Based on the overall TRAP-18, Mr. Ahmed currently poses a moderate risk for terrorist targeted violence.

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Mr. Ahmed demonstrated pathway warning behaviors, planning and preparation to enter Syria to help wage a Jihad. The defendant demonstrated fixation with Sharia Law, leaders within ISIS and to punish non-believers, spending a disproportionate amount of time on social media. He demonstrated identification and referenced prior terrorist attacks; however, he did not appear to create or take the appearance of a holy warrior, military or law enforcement person. He demonstrated increased behavioral bursts to travel overseas and accomplish his goals. Mr. Ahmed engaged in some leakage regarding his effort to wage and participate in Jihad.

Mr. Ahmed, beginning during his juvenile years, experienced escalating failures including (a) an inability to enter age-appropriate intimate relationships and (b) accomplish basic academics-work responsibilities. In this examiner's opinion, he fused his personal failures with a group and/or cause he believed was victimized by the United States, subsequently leading to his rationalization and justification of violence as a method to fight perceived oppression. Mr. Ahmed demonstrated symptoms of a mental illness that remained untreated, depression, that included isolation, lower motivation and a depressed mood that eventually led to an increased reliance on a virtual community. His sustained alcohol/drug use masked the severity of these symptoms. The defendant demonstrated no history of criminal violence prior to this current arrest.

In sum, based on the TRAP-18, Mr. Ahmed currently poses a moderate risk for terrorist targeted violence.

CONCLUSIONS

It is this examiner's opinion that Mr. Ahmed, based on the current assessment process, poses a moderate risk for further terrorist targeted violence.

Mr. Ahmed's seeds for terrorist targeted violence emerged in the context of a dysfunctional family, undiagnosed mental health problems, social/intimate relationship deficits and escalating failures across multiple domains. The culmination of the idea to travel overseas to join extremist groups, crystallized in 2016, provided a fantasized hope to shift attention away from an abusive father and his own failures. Mr. Ahmed's failures and psychiatric condition fused with interests in Islamic causes and rapidly devolved into the belief that violence was an effective method to manage his depression and perceived wrongs.

Mr. Ahmed created false hope to deflect and distract himself from an otherwise meaningless existence. Unable to stand up to his reported dictatorial and abusive father, he invigorated himself by focusing on the perceived wrongs committed by the United States against Syria, their community and ISIS. He imbued himself with the fantasized powers to fight against a greater perceived enemy and grievances. His own grievances, fused with those of ISIS, contributed to an escalating threat where he moved from reportedly attending a lecture with an Imam, to finding information about a Canadian who fought in the Jihad, posting his own digital material which grew in frequency over a two-year period to attempting to enter Syria from Jordan in the summer of 2017, with the intent to fight and join an extremist group.

Ahmed, Parveg (6/15/1995)

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Mr. Ahmed's relevant pathway warning behaviors include fixation, identification, research and travel overseas, reliance of virtual community and probing to determine his capacity to travel to affiliate with extremist groups. His historical relevant factors included untreated Depressive Disorder, substance/alcohol use and persistent failures in multiple life domains, including significant deficits in his capacity to enter and sustain age-appropriate intimate relationships. It is this examiner's opinion that Mr. Ahmed suffers from a Depressive Disorder, beginning during his adolescent years, which remained undiagnosed and untreated, not uncommon within the Bangladeshi community. His reported symptoms included a depressed mood, low motivation, low interest, isolation, poor self-esteem which eventually led to the use of drugs/alcohol as a form of self-medication. Moreover, he was exposed to repeated violence between family members.

Mr. Ahmed verbally conveyed remorse and appears to have some rudimentary understanding for the genesis of his behaviors/decisions, however, continues to oversimplify the use of the Quran as the primary tactic to mitigate possible emerging risk. While the use of the Quran can, and should serve to help mitigate risk, there is a lesser appreciation of how his grievance with family as well as repeated failures in multiple life domains created a pathway to affiliating with an extremist group to the extent that he was willing to travel to Syria to help wage Jihad. His assessment of his risk as non-existent does not carefully consider his behavioral pathway over a course of two-three years leading to his eventual arrest.

In this examiner's opinion, Mr. Ahmed's management in the community and/or while incarcerated, should include individual on-going counseling. This modality should follow cognitive behavioral tenets to evaluate the impact his developmental experiences had upon his cognitive, decision making and emotional functioning, anxiety and depression. Mr. Ahmed is genuinely receptive to 1:1 counseling but it is likely going to be a slower process as he is prone to present himself, at times, in an overly favorable light. Nevertheless, during the current assessment process, Mr. Ahmed was willing and open to delve further into identifying and correcting distorted thought processes. It is also this examiner's opinion that a pharmacological intervention be initiated to manage depressive and anxiety related symptoms. Finally, the participation of a substance use program is strongly recommended.

The opinions above reflect the information available at the time of the completion for this Report and may be subject to modification should additional information be made available.

Signed this date June 28th 2021 in New York City, New York

Respectfully Submitted,



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Addendum B

Defendant: Ahmed, Parveg
Date of Birth: 6/15/1995
Arrest Date: 8/28/2017
Indictment: 17-378 (AMD)
U.S. District Court, Eastern District of New York
Report Date: 6/28/2021

COLLATERAL RECORDS REVIEWED

Eastern District of New York Indictment Cr. No. 17CR-378
Affidavit in Support of Arrest Warrant
United States District Court of the Eastern District of New York Case Review. 17M643, 7/17/17
FBI Case Files, 1/27/16
United States District Court of the Eastern District of New York Affidavit in Support of an
Application, 8/27/17
United States District Court of the Eastern District of New York Affidavit in Support of Arrest
Warrant – 17M766, 8/28/17
Search Warrant, Honorable James Orenstein, United States District Court Eastern District, 17M766,
8/28/17.
United States District Court of the Eastern District of New York Application for a Search Warrant
for Information in Possession of a Provider (Facebook Accounts), 9/22/17
U.S. Probation Department Sentence Recommendations – Docket # 17-CR-00378-001, 4/3/19
United States Department of Probation Eastern District Presentence Investigation Report, 3/11/19
Interrogation Video, August, 2017
Ahmed, Parveg, Facebook Posts

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Addendum C

Defendant: Ahmed, Parveg
Date of Birth: 6/15/1995
Arrest Date: 8/28/2017
Indictment: 17-378 (AMD)
U.S. District Court, Eastern District of New York
Report Date: 10/27/2022

RECORDS REVIEWED

- United Consulting Services, Dmitri Oster, LCSW – Progress, Clinical Notes, Letter, 4/13/21 – 7/29/22
- Memorandum Decision and Order, United States District Court of the Eastern District of New York, 17-CR-378(AMD), Ann M. Donnelly, United States District Judge, 8/26/22
- Letter, Federal Defender’s of New York, Inc., Sabrina Shroff, JD, 8/17/22
- Letter, United States Department of Justice, United States Attorney of the Eastern District of New York, 17-CR-378(AMD), Craig R. Heeren & Josh Hafetz, 8/12/22
- Letter, Federal Defender’s of New York, Inc., Michael K. Schneider & Sabrina Shroff, JD, 8/11/22

Dear Judge Donnelly,

I write to you today to express regret for my actions. I know I made some extremely bad choices and attempted to do a horrible thing, a serious act that I must now pay for. I'm writing this to show you that I am not the same person who tried to join ISIS five years ago.

I take full responsibility for my actions. I now understand more fully the seriousness of my crime and the follies of my previous thinking, and have taken steps to become a better person. At the time of my arrest, I was an arrogant and ignorant man-child. I believe I have now become more humble, more informed, and more mature, and I hope this letter shows how much I've really changed.

I now understand that I was naive and foolish, and that the hubris of my conceit made me ripe for a foolish act of any kind. It so happened that I picked the worst thing possible to be my choice of escape.

Although I was a bright child growing up, always at the top of my class and made it to Stuyvesant High School, one of the top high schools in the city, I fell off in high school. The elevated level of studies combined with much brighter classmates and a lack of study skills left me insecure about my own intelligence. The bullying I had endured in middle school and at home began surfacing as depression and anxiety, so I turned to drugs (mainly marijuana) to cope with all the negative feelings, but that only made it worse. In my youth and drug-induced haze, I didn't much care about all the classes I began failing. I didn't take anything seriously. Only at the end of senior year did I finally wake up, when I was told I couldn't graduate and would have to come back for a fifth year. At this time a real panic set in, as I realized I had wasted all the potential I had had as a child and was headed nowhere and fast.

I had burned all bridges at this point and had no elder influence at all, not being able to even properly talk to an elder for more than a minute. I looked for direction & guidance and thought religion could give me that. It definitely helped in some ways, but my arrogance, confusion, and solitude made me abuse it in other ways. The biggest mistake I made at this point, two months into my own practice, was to begin watching some ISIS videos. The first thing that fooled me was the kindness and generosity they showed in that first video, handing out food and kissing children. That first video made me rethink the bad I had been thinking of them, and so I started watching more of their videos, completely diving into the rabbit hole. Thinking they were pious Muslims, I fell for their propaganda, seeing that they were quoting the Qur'an but not realizing it was improperly interpreted and believing their historical facts, not realizing it was their fanciful spin on history. Perhaps what I liked most was the sense of empowerment they gave me, somebody who had failed at most aspects of his life and was now being told his failures were due to a world-wide conspiracy against Muslims.

I probably would have just let these thoughts run through my head and never acted upon them if I began to have success in life, but I didn't. Although I had stopped using drugs, my lack of study habits or time management skills, along with my procrastination habits & insecurities about my intelligence, led me to continue failing classes in college. My failing grades coupled with my fervent desire to see my family become more religious led to clashes with my family,

leaving me to feel like I wasn't being taken seriously. I began to leave home and sleep elsewhere. I tried to get married and launched three different businesses (a tax office, a clothing line, and a testprep workbook company), but everything resulted in failure (due to my high expectations and proclivity to run at the first sight of obstacles).

I felt like I was in a never-ending cycle of failures, and the resulting depression and desperation led me to attempt to join ISIS, having nothing to look forward to and nothing to lose. At the time of arrest, I portrayed myself as brilliant and bombastic, but I now realize I had never come to grips with my failures and insecurities, and was looking for anything to hold onto for self-confidence.

Getting arrested was a real shocker for me and I was initially very depressed. Being locked up was of course a real challenge, but what hurt me the most was seeing how much I hurt my family. My mother couldn't help but cry at every visit, and she told me how my older brother cried for days when I got arrested, crying like she'd never seen him cry in his life. My father showed a stoic face, but my brothers relayed how he would burst into tears at random times, crying over my fate. I didn't think my family had much love for me so their reaction was heartwarming, but devastating. Knowing I was causing so much pain made me try to fix my life and turn things around.

I thought the religion still offered guidelines on how to improve oneself, so I began there. I had always wanted to study Islam, even applying to Islamic Universities, but due to the college work and the whirlwind of a life I was living, I never had a chance to. Now, I began studying the Qur'an every day, and asked my family to order other Islamic books for me. I was being made fun of and picked on inside the jail for how skinny I was, so working out became another important endeavor. It was a slow process but over time I made progress in both arenas: the other Muslims recognized that I was serious about learning religion, and so selected me as the Imam, to lead the prayers and give a weekly sermon; I also began to gain weight, earning people's respect for making a real effort, and showing results.

My education combined with the new experiences, elder influences, and a lot of soul searching resulted in major changes:

At first, I was the same arrogant kid who didn't respect his elders and thought he was smart and tough. The religion taught me I had to learn to respect my elders, and being the youngest one in the Unit (120 inmates), I really learned through experience: when my mouth nearly landed me in trouble a couple of times, I learned I wasn't very smart, or tough, and I learned how to talk to others properly and humbly.

In some ways jail was a blessing for me. Although I had before heard that viewing pornography made you objectify women, it was only after my arrest & after I had quit for about two years, did I finally begin to see women as individuals and recognize my previous objectification. As crazy as it sounds, when I finally began to recognize that women had feelings, thoughts, and insecurities like I did, I began to be able to have better interactions with women. My relationship with my mother is thus today at an all time best. It should also not be understated how helpful it was, in this regard, to be able to work with three highly intelligent

women: Ms. Sabrina Shroff, Rebecca Weiser and Lisa McDermott. They really transformed my understanding & respect for women. I was definitely a misogynist in the past. I am grateful that I can today see more clearly, and today greatly value the compassion and perspectives that women bring to the world.

I also learned tolerance in jail. After I became radicalized, I stayed away from everyone who wasn't Muslim. Coming to jail, I had to live with people from different cultures, religions, and backgrounds. Although at first, I definitely struggled, I soon began to enjoy bunking with people of different backgrounds: I've stayed with Russians, Chinese, Koreans, African Americans, White Americans, Africans, Hispanics and everything in between. I've shared a cell with people who were Sikh, Jewish, Christian, Muslim, and even Atheists. I always asked a lot of questions and tried to learn about all the different cultures. It's one thing to read about culture in a book, but it's a whole other thing to live with somebody immersed in the culture their whole lives. While it strengthened my faith in Islam, these interactions made me learn to respect and empathize with the different peoples of the world.

My work with Mr. Dimitri Oster, the licensed social work I was lucky to work with, played a major role in my improved mental health & self image. Although I had not been successful in talk therapy in the past, I was able to really build a rapport with Mr. Oster and benefit from our relationship. I credit that to both my strong desire to change my life and to his acceptance of how important religion was to me. He helped me to further understand how the religion could play a positive role in my life, simply without all the aggression, intolerance, and the black/white mentality I had previously attached to it.

With Mr. Oster's support, along with a book on trauma I had the fortune to stumble upon (*The Body Keeps the Score* by Bessel Van Der Kolk, MD), I finally had the courage to face the trauma and negative relations I had in my life. I am still surprised at the tremendous improvements I was able to make, healing from problems that have ailed me my whole life. The two psychology techniques that I found to be most helpful for trauma were "Eye Movement Desensitization and Reprocessing" (EMDR) and "Internal Family Systems" (IFS). I feel like I have more work to do in this regard, but I find myself today to be much more relaxed and comfortable in my own skin, and able to express my emotions in a way that I could never previously do, even when I so desperately wanted to. In the same light, I am much more comfortable around people, not panicking at the first sign of intimacy or aggression. Thus, I am able to trust and open up to people more, be more tolerant with their human flaws and idiosyncrasies, and just generally be more affable. I now recognize that although I have gone through trauma, such as sexual assault as a child, I am responsible for how I react to the negativity. I now understand that while I can't control other people, I can choose how to react to their negativity, and I now know that the best way to deal with is patience, kindness, and prayer. Anything else is destructive.

As for my relationships, the first step was to lose the anger and resentment I had towards those who had hurt me in my youth and/or abused my trust, especially my parents and older brother. Especially after seeing how much they really did care about me & continue to support me during my incarceration, I concluded that I needed to forgive them. Some conversations

about past wrongs were finally had & some ensuing apologies from them really helped me to move on even further. Today I feel lighter, the weight of all that anger towards the world thus subsided. Eventually I finally found the courage to apologize to my family myself, for all the pain, suffering and humiliation my crime has caused them. I was relieved to see them accept my apologies as well. Without a doubt, my relationship with each & every one of my immediate family members is significantly better than at any point in my life before.

Another major lesson I've learned from my time in jail is perseverance. Because school had been so easy for me before high school, I never developed study habits, nor the tough skin needed to persevere through life's obstacles. Forcing myself to study the Qur'an every day and work out several times a week began to change that. It took years, but I was able to accomplish two things I had always desired but thought I would never be able to do in my lifetime: I learned Arabic proficiently enough to understand the Qur'an in its original language, and I gained 40 lbs. of muscle, transforming myself into something I could have never imagined. This gave me the confidence to know I could accomplish whatever I put my mind to, knowing that I just have to remain patient through the rough patches that inevitably arise whenever you try to accomplish something worth accomplishing. I put that same energy into sports and went from being made fun of to becoming one of the best competitors at basketball, handball, AND ping-pong!

But my biggest challenge was the Paralegal Certificate Course I enrolled in. It was 31 tests long and consisted of long and densely-worded workbooks to learn from, full of new vocabulary and new concepts. While I started out strong, near the middle, that familiar boredom, procrastination, and desire to quit crept in. I almost gave up at one point, but when I realized that I would be doing what I had done throughout my life, I struggled through and kept pushing, willing myself to the finish line. It might not mean much to others, but that Paralegal Certificate is the accomplishment I am most proud of. It was tough material and I wanted to quit, but I was finally able to persevere to the end of a project. It gives me great confidence knowing I completed it, feeling like I now both know and HAVE what it takes to accomplish anything!

Being selected as the Imam definitely played a pivotal role in my growth. A major lesson I learned was responsibility: in the first couple of months, I would regularly come late to prayers and have my congregation disgruntled and waiting around for me. Now I've developed that sense of responsibility to stop whatever else I'm doing to fulfill the obligations of the position: whether it's leading the prayers 3-4 times a day, preparing and delivering a weekly sermon, or conducting an Arabic language class, I am now always the first one there, fully prepared and ready to go. I think that sense of responsibility will help me in life going forward.

Another benefit of this position was developing leadership skills. I was forced to learn how to inspire others, keep people together, and resolve conflicts. I've never had any physical power like gang members do (controlling the jail's TVs, tables, phones, etc.), but I try to have a spiritual impact. Other inmates see me as a role model and thus emulate the respect and good manners I try to present, thereby making the Unit into a place of peace and civility. I am still surprised how I went from being socially inept to becoming a leader, but to me, it speaks to the power of morals and good character, taught to me by my religious studies. I think people also respect the drive I have to accomplish, and feed off of the energy I bring to life. In the future, I hope I can use that

influence to make positive impacts in my neighborhoods and communities, whether it's through preaching or through building community organizations.

My leadership position also taught me the importance of respecting authority & obeying rules. I used to have major problems with authority figures of all kinds, being rude, criticizing them, and looking for their downfall. I now understand how difficult it is to hold any leadership position, how leaders have to make difficult choices which critics on the sidelines are completely oblivious to, and how important & difficult it is for a leader to maintain peace and stability. While it was previously easy for me to sit in the back, snickering and scoffing over the mistakes and flaws of leaders, I now have tremendous respect for all peoples of authority. I used to question why I had to follow certain rules, procedures and laws, but I now appreciate how much tranquility is brought to the whole community when the rules are respected and obeyed.

Finally, my weekly sermons greatly benefitted me in that it forced me to expand my studies in order to address a wider variety of topics, and the research required to develop the sermons gave me necessary experience. After seeing how much people enjoyed my sermons, I began to think that perhaps I could write a book. Although it took me a year of reading writing books and trying to further develop my writing skills, I finally began writing a year ago. I'm proud of what I've written so far, and am driven to keep going and complete my first book. This first book is a book on Islam for beginners, utilizing the Prophet's teachings (i.e. his Hadith) alongside my explanations of them, to teach the basics of Islam. I am confident that I can finish this book, and this confidence is borne from a combination of all my previous endeavors: my personal studies gave me the knowledge, my sermon writing gave me the experience, and my previous accomplishments (especially the Paralegal Certificate Course) gave me the understanding of the dedication and perseverance required to complete the project. I dream of having many books published in my lifetime, and I already have other titles in mind, such as "Masculinity in Islam" and "How to Develop a Relationship with God".

Of course the biggest change I must address is my previously radicalized thinking. Today I see clearly the fallacies of ISIS ideology and have turned a new page. Seeing their physical "caliphate" disappear and their prophecies go unfulfilled began my disenchantment, but the biggest agent of change came through my studies. The most damning evidence I found against them was in the book "Three Fundamental Principles" by Ibn Abdul Wahhab. In the book, the author quoted Ibn Abbas' interpretation of the Qur'anic verse ISIS regularly used to quote: "And whoever does not judge by what Allah has revealed - then it is those who are the disbelievers." (5:44) ISIS took the verse extremely literally, and thus declared all the Muslim leaders as disbelievers for not ruling by Sharia Law, thus making it permissible, even necessary, to fight them. They then fight the US for supporting these "disbelieving regimes". Ibn Abbas' interpretation was totally different. He said that it was "a disbelief less than disbelief", which means that to not rule by Sharia Law was a sinful act, but did not make you a disbeliever. The reason this evidence is so damning is because ISIS claims they follow the pure interpretations of the Prophet's disciples, routinely condemning other Muslims for following later and more lax interpretations. Meanwhile Ibn Abbas was one of the most learned disciples, and ISIS is going in direct contradiction to his interpretation! This proves that they are not truly following the truth

but following their own whims and desires. If Ibn Abbas is correct, and it seems that he is, then the Muslims leaders are not disbelievers, thus not allowed to be fought, and thus the US is now allowed to be fought either. This dismantles ISIS' ideology entirely.

I further saw the fallacies of ISIS' history lessons from non-fiction books I read. ISIS claimed that the Muslims had been united under a single Caliphate for thousands of years until the Ottoman Caliphate was dismantled after World War One. Thus they were only trying to revive this Caliphate to once again have Sharia law. While true that the Ottoman Empire was dismantled in 1924, the Ottomans did not even practice Sharia Law themselves. Furthermore, the Muslims were never one monolithic group anyway. History shows that they were always divided into different groups and different empires, and were constantly fighting amongst themselves. So the myth of a united Muslim empire that practiced Sharia Law is just that: a myth. While I see the merits of Sharia Law, it's not the end-all-be-all that they make it out to be. I only wish I had the humility and curiosity to check on ISIS' false claims years ago.

Now I can clearly see that ISIS is full of hot air, wrong interpretations, and lies. In the future, I would like to help disseminate more information refuting them so that other naive, young Muslims don't get caught up in their madness. With enough research I may even be able to write a whole book refuting them. They are a nihilistic, destructive group who can't be reasoned with. I'm ashamed I previously aligned myself with them and all the cruelty, violence and bloodshed they bring to the world, and I am terribly sorry that I tried to make myself an instrument to such horrors.

The piety and generosity I witnessed in their videos did confuse me for a long time though, until I came to a hadith of the Prophet. He (may peace and blessing be upon him) said that near the end of times, there would arise youth who possessed beautiful Qur'an recitations and lengthy prayers, whose piety would make you look down on your own prayers. But the Prophet said that the Qur'an would never reach past their throats, meaning they never truly understood the teachings of the Qur'an and were thus faking their piety. He predicted that these youth would become extreme in their religion and cause much destruction. It is a bit shocking how well ISIS fulfilled this prophecy, but now I understand that the piety I saw is merely showing off and propaganda, not the humility that true Islam requires.

When I get out, the first thing I want to do is take a Computer Coding Course. I enjoyed the coding class I took in college and can see myself excelling at it with enough study. I hope the coding course will allow me to develop invaluable, in-demand skills which would allow me to have a stable career and source of income. If that is not available, then I would look into some technical training, such as electrician or HVAC courses. After securing a job, I would like to get married and have kids. The plan after that is to focus on my family, but also write part-time, so that I can fulfill my dreams of publishing books. I have had a zeal for God and religion ever since I started practicing, and this is partially what led me to fall for ISIS propaganda. Now I feel I have a much healthier way to express this zeal: writing books on God & religion, helping others to develop that same love that I have for them. I know I still have a lot to learn about life, but I believe that I have the necessary humility and determination to learn and grow. I look forward to the next chapter of my life.

Your Honor, I have made a strong effort to change. Today I always try to be a positive influence on those around me. I want to reiterate that I understand how severe my crime is, and I also understand that, especially for purposes of deterring others from doing the same, I deserve a sufficiently substantial sentence. I only ask that you give me a second chance and show leniency at sentencing. I promise you that you will never regret it. Thank you for reading & God Bless.

Parveg Ahmed

Honourable Judge,

I am the helpless mother of Parveg. My son has not been with me for 5 years. My four sons are like the 4 parts of my heart. How can I stay peaceful without a part of my heart? During these 5 years, I cannot live peacefully. I got married when I was 17 years old. I got my 4 boys within my age of 23. I came to America when my eldest son was one year old, and Parveg was only 3 months old. After that, I gave birth to two more boy children. We didn't have any relatives here in America. I was pregnant, I had my child on my lap. I had to do all sorts of household chores by myself like shopping, cooking, cleaning, taking my children to school, going to mosque for prayer, and visiting the doctor. I have undergone a great struggle with my four boys in this new country. Their father also struggled a lot. He went out for his job at 8 A.M. and got back home at 11/12 PM. He sold hotdogs standing on the street. After his day long work, he can only earn 60 dollars daily. We had to manage all our expenditures like home rent, utility bills and sending money to the relatives in the country with this 60 dollars. We did not have any benefits like food stamps or others.

We couldn't manage luxurious food or dress, not even good toys for our children. We managed 99% of our expenditure from the earning of the cart. We worked hard and dreamt that our four sons would be good human beings. Alhamdulillah, they have been modest in their behaviour. In a small room, the four brothers had been raised up, but never quarrelled among themselves. We were astonished that they had such affection among them that even though they got only one candy, they divided the candy into four for themselves. If guests came to visit us, they were so respectful to them that they gave everything they had. Parveg was the most kind of them. He was kind, modest and affectionate. If he needed something, he just asked one when the other three bothered us again and again. As he only asked one, we used to think that he did not need them anymore. For this, he was deprived of many things. And started thinking that we do not love him much.

He engaged himself in computers. We used to think that he was busy with his studies as he was a very meritorious student. Without any tuition, he got admitted into Gifted Programme school from 3rd grade. Then he got the chance to be admitted into Prep for Prep when he was a student in fourth grade. But unfortunately, he couldn't be admitted there since his father had a limited income. When he was a student of fifth grade, he got an honourable gift among the numerous students of Gifted School. He got an award from Gifted school in Science, Mathematics and English for outstanding results. Again, without any tuition, he got the chance to be admitted into Stuyvesant School. Everything went well when he was a first-year student. But in his second year, he got some bad company. He had no attention to his study, didn't complete the homework in time. So, we rebuked him. Somehow after passing the school, he started his college in Hunter College. But this was a bad decision for us to rebuke him, rather we should have counselled him softly. After that, he became quieter in nature and got hurt. He got spoiled by some online videos. He could not understand that he was not going to do something good. He made mistakes. Please forgive him as well as forgive us.

We are admitting that my son and we made mistakes. He is frequently saying that he has got the point of his mistakes and will not do this sort of mistake anymore. He asks pardon, we are also seeking pardon, please forgive him. We have been aging. We are not in a good physical condition. Their father underwent an open heart surgery. He is also suffering from high blood pressure, cholesterol, and diabetes. Parvez is very much helpful. He will take care of us. He can support us both mentally and physically. He will take care of every individual and will also help the neighbours. Please give him pardon and return our son to us. Parveg will do service or business after getting back home. He wants to get married as well. And he will take care of everybody. And he will never make such a mistake again in the future. So please return our son back to us, please. As far I know, you are also a mother. A mother can only feel the pain of another mother. I am requesting again, please return our son to us.

(Asma Begum)

माननीय जज,

आमि एक अज्ञात मा
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 वाड्या कथा, उदय पुल मिये आमा-याउया
 लकी कथा, मार प्रीठे याउया, मजदिये
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 (Asma Begum)

Dear Judge Donnelly,

As I live a successful free life in corporate America I feel like a parasitic twin. The truth is, Parveg's older brother and parents failed him and led him to where he is now. And most importantly me, at many times of my day to day life I feel I am most deserving of his punishment.

Parveg was one year younger than me and ever since we were babies I was selfish. Anything we played with, ate, watched, I wanted to play more, eat more, watch more. My parents bought us a gameboy and I'd sit there and play on it 90% of the time while Parveg would quietly watch over my shoulders. If I wanted something from our parents I would be stubborn and fight and get it. Parveg was not stubborn and would obey my parents when they said no. As we got older and made friends, I wanted everyone to like me more. I hogged friends and intentionally left him out. In school when he wanted to say hello to me and my friends, I'd ignore him.

This made an impact on Parveg as he grew up. He felt he was not heard- by his parents, they always said no to him but agreed to what his older brother wanted, and his brother didn't care for him either, never letting him play or be friends with him. Parveg resorted to quietly reading books all day. That was his first true form of happiness. He got so obsessed with it my dad snapped at him one day to stop reading so much and that he was going crazy and ripped his book apart.

As he entered middle school and high school it was apparent Parveg was much smarter than his peers. He was having difficulty mingling with people at school and home life still hadn't changed much - but gotten even worse (a dad that at this point was clinically declared with depression and anger issues). This whole time I was also continuing to be selfish, fighting my own internal demons as well, and had pretty much lost all contact with him.

So Parveg resorted to doing drugs to connect and make some friends and, hey, it made you forget everything wrong in your life and feel happy for once too. When my mom found out he got into drugs and alcohol she was devastated. He promised our mom he'd quit but I found out he had started again from some mutual acquaintances and confronted him about it. I still remember him begging me not to say anything to mom and said he'd stop for good if we'd rekindle our brother relationship. Little brother asking the older brother. I agreed but of course pathetically never followed through and continued to distance him from myself.

Parveg is definitely not perfect. But he spent his whole life living in the shadows, not being heard, having trouble feeling loved by his family and his older brother, not really feeling connected. And that's all thanks to his family that failed him. These life events or situations accumulated to providing the perfect prey for these online "religious" folks hoping to provide a purpose and meaning and community to these lost young souls.

Parveg, while enduring such a childhood, would be the first to take care of our parents when they were sick, would tutor and mentor the neighborhood kids, would sit with elderly people and listen to their stories and make them feel heard, would always put others before him. It's just unfortunate one big lie told to him would put the whole world above him.

Your honor, as you sentence him, I beg you to consider the lost and forgotten young boy that just wanted to be heard and love others, that was brainwashed and led astray due to the failings of his own

family. I know many other people you have sentenced also come from unfortunate backgrounds, but Parveg was young and he's matured and has a strong family who will support him now after failing him his whole life. This sentencing will be punishment just as much for us as it will be for him. The punishment that is the guilt of my selfishness and failings as a big brother that led him to where he is.

Thank you for reading and for your mercy your honor.

Regards,
Fahim Ahmed
(347)322-7762

Alvie Ahmed

9720 76th street

Ozone Park, NY 11416

fireyalvie@gmail.com

November 10, 2022

Re: Sentencing of Parveg Ahmed

Dear Judge Donnelly,

My name is Alvie Ahmed and I'm the youngest brother of Parveg Ahmed. I am currently a college student studying Economics. I understand the severity of Parveg's charges but I just ask you to show some compassion for a grave mistake he made.

When Parveg was first detained, I was a high school student. It was a hard time for my family, including me. Parveg was a kind and understanding brother growing up. While I have two other brothers excluding Parveg, I felt as I was closest to Parveg growing up. During our childhood, we used to play backyard baseball. Parveg and I versus my other two brothers, Fahim and Ashfaq. He was my teammate every game for multiple summers and he would give me advice on how to improve in batting and pitching. Once Parveg got into highschool, I felt as if he started to distance himself. He would be to himself, he wouldn't really talk to me as much, and I felt as if I lost my brother at the time. I now understand that he was going through his own struggles at the time, and that he felt he couldn't talk to his little brother about it.

By the time I got into high school, Parveg and I started to talk more. I had my own struggles, but thankfully I had him to talk to. I had social anxiety and it would be a huge issue for me. Parveg would give me advice on how to deal with things, he would help me with my

schoolwork, and was someone I could talk to when I was home. I did not have much friends during this time period, so I was really close to Parveg and grateful that he was someone I could talk to. Once Parveg got detained, it was a lot for me to handle. I was still trying to figure myself out and losing someone like Parveg made things harder. I felt as if I lost my brother and it's a feeling I have even to this day.

Once again, I understand the seriousness of Parveg's actions but I truly believe he made a mistake and has worked on himself positively. He is also looking for a lot of opportunities once he gets out. Just recently, Parveg was telling me about how he was looking into a tech course for ex-inmates that trains them and helps them get a job. Parveg is looking forward to coming back home and being a positive impact in society. I hope you can see that in him as well. Our parents are getting old and all I want is for our entire family to be back together again. My mom always tells me about how she can't wait to have dinner with the entire family and see all her sons sitting together. I know how much it means to her and it breaks my heart everytime. Once again, please show compassion towards Parveg as I want to see my brother, my teammate, and one of my best friends come home.

From ,

A handwritten signature in black ink that reads "Alvie Ahmed". The script is cursive and fluid, with the first letters of "Alvie" and "Ahmed" being capitalized and prominent.

Alvie Ahmed

Ashfaq Ahmed
9720 76th street
Ozone Park, NY 11416
ashfaq.ahmed6482@gmail.com

November 11, 2022

Re: Sentencing of Parveg Ahmed

Dear Judge Donnelly,

My name is Ashfaq Ahmed, and I am the younger brother of Parveg Ahmed. I grew up with Parveg in Ozone Park, Queens and some of my favorite memories while growing up are with him. I am humbly requesting to impose the minimum sentence upon the defendant. I believe he is a good-hearted person and if you grant this request he will surely turn his life around. I think the defendant merits another chance to continue having a positive presence in his family and neighborhood.

Parveg was always a good older brother and would spend time with us. He was a major fan of baseball, specifically a big fan of the Yankees. He could name every player and tell you their statistics. Parveg, our two other brothers and I spent our childhood obsessed with baseball. We bonded by playing baseball in the backyard with paper balls that we made, took turns playing baseball video games, and watched the Yankees game every night. I remember when the TV was off limits for the night, the four of us would sneak off to our bedroom and listen to the game on the radio. We would huddle around the radio and you could see the excitement on Parveg's face when the announcer would call a home run. When Parveg got older and started to earn money he would take me and our youngest brother to batting cages and baseball games so we

could experience his hobbies with him. Nowadays watching baseball is too painful to watch, as I am reminded of my memories of him and the situation he is currently in.

Parveg also excelled academically for as long as I could remember. He was always at the top of his class and was honored as the valedictorian. I would always look up to him and want to be as smart as him. Throughout my fifth-grade to tenth-grade experience, our youngest brother and I were homeschooled and Parveg was the main reason we were able to pass the state exams. Even while he was attending school at Stuyvesant High School, he took the time out to tutor us and get us ready for the statewide tests. I ended up scoring with mostly 4's, which was the highest grade you can earn on an exam. After being homeschooled, I went back to public school to finish my education and he navigated me through the challenges in high school. I will forever be grateful for the sacrifices he made so that I could have a successful education.

Not only did he tutor me and my brother, but he was also known as one of the best tutors in our neighborhood. Friends and parents constantly approached him to help their children get into specialized high schools, just like he did. He tutored several kids around the neighborhood and they all prospered in their classes. He also worked towards opening a tutoring business for all of his students. He helped the youth of the community exceed academic expectations.

During the end of my high school education, we grew apart as I got busy with school and prepared for college. We did not speak too often but I noticed Parveg was facing challenging times due to school and familial issues. He would spend his day isolated in his room. I was too young and naive to understand what he was going through. To this day, I regret not letting him know that I was there for him.

During his time at the Metropolitan Detention Center, our relationship has become stronger. I visit my brother as often as I can and I love speaking to him when he has the opportunity to call. From our conversations, I believe that he has changed throughout the years and that he regrets the mistakes that he made. Even while in prison he never stopped showing that he cares about his loved ones. To this day, he still takes time to mentor me during our limited calls, and he helped me choose a career I would enjoy. I am currently working at a tech consulting firm and strongly believe I would not be able to be here without his help.

I have known Parveg Ahmed my entire life, and I can full-heartedly say that he is a kind-hearted, smart and hardworking individual. I truly believe he regrets his decisions and would love to rejoin society so he can have a second chance to be a positive impact on me, my family, and the community. He has worked on bettering himself even while in prison and I believe he will continue to do so. Every time we spend time together as a family we feel a piece missing and it does not feel right to enjoy ourselves without him. My family and I dearly miss him and nothing would make us happier than to have our family reunited.

Thank you,

Ashfaq Ahmed

Ashfaq Ahmed

I am Abdul Hannan, father of Parveg hereby state that, we have become crippled for his absence. Our daily activities have come to an almost standstill. From his childhood he was a constructive mentor. Development of the status quo of the family was his only concern. His ideas for the betterment of the society were exceptional.

(2)

He had started free classes for the education of the children of the community. He got an opportunity to study in Prep-for-Prep and later in Triversion without any coaching facility. He wanted to share those experiences with the community children. His background checks at Howard Beach School's Talent Class and Triversion School will reveal these facts.

(3)

We were very happy with his conduct, learning and great thinking. The people of the community also praised him enthusiastically.

But suddenly he is led astray by a cunning intrigue and jealousy. We did not understand what bad advices they gave him. When talking about these things, he just says I made a mistake.

Everything was a fallacy. I came back from that road with a U-turn. If someone understands the mistake and comes back corrected, is there no forgiveness for him? Surely there is a chance. We want him to be pardoned and allowed him to repeat his good deeds.

Abdul Hannan
11/11/22

মোহাম্মদ আব্দুল হাম্মান, ~~পিতা~~
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তার মনঃ-সামান্য সুখস্বভাব
ছিল।

যিনি হ্যাঁ স্বাস্থ্যের
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দিয়ে ছিল, আজ্ঞা এই মত
সুস্বভাব পাঠি নহি।

এখন এই মত বিয়ে ~~কিন্তু~~
আলাদা স্বামী কেবলই মনে

আমি মার, মার ডেল হাউস

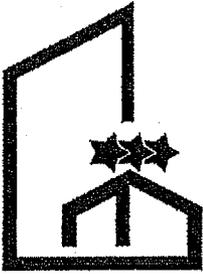
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এক বছর মাদি ডেল বুলে
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তার মাসায় মাজিটিউ
সিদ্ধান্ত হাউস দিখ-তার

আমি মার (5000) মার হাজ মুলি
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Chance দেওয়া হওয়া
ইতি আমায় মার

Abduftannan
11/11/22



Three Star Construction Group LLC

Licensed and Insured
Threestarconstruction29@gmail.com
kazi@tscgllc.com
Firestone® Licensed Roofing Specialist: 40012594

2970 Pitkin Ave Brooklyn, N.Y. 11208
(646) 785- 2436
(917) 200- 1211

(917) 204- 5903

July 5, 2022

Dear Judge Donnelly,

My name is Kazi Ahmed and I am the owner of TSC Electric Corp and Three Star Construction Group LLC. I have known Parveg Ahmed through his brother Farhad Ahmed whom I have known since high school.

I am fully aware of the charges against Parveg and his guilty plea before this court. I understand the seriousness of the charges against him but I am also fully aware of the changes he has made while he has been in jail. I know that at the core, Parveg is a smart and kind person.

Having known his family intimately for such a long time, I feel it is my responsibility to help not only guide him through this time but also give back to our community. I hope that in giving him a second chance, our community learns to further support its youth.

I am willing to give him a job where he has the opportunity to learn continuously potentially by:

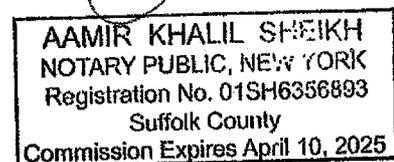
- Providing administrative support i.e.: paper filing, phone calls
- Learning state and city wide regulations
- Client contract drafting
- Submitting permit applications etc.

I will supervise him and if needed provide an update to Pretrial and the Court.

Please reach me at (646)785-2436 for any questions or concerns

Best Regards,

Kazi Ahmed



Mazid Uddin
105-05 77th Street
Ozone Park, NY 11417
maziduddin04@gmail.com

November 11, 2022

Re: Sentencing of Parveg Ahmed

Dear Judge Donnelley,

My name is Mazid Uddin, and I am a childhood friend of Parveg Ahmed's youngest brother, Alvie Ahmed. I met Parveg through Alvie at a young age because the two of us grew up together and would go over to each other's houses often. I remember feeling jealous when Alvie would often tell me that he played video games with Parveg, because I also wanted to play games with an older kid. He spent so much time with Alvie, I wanted to have that. But Parveg never forgot to treat me like I was family even though I am not. Just like an older brother would, Parveg taught me how to play baseball and gave me pointers on how I could improve. I would often play baseball with him and his siblings at the park and Parveg would give me updates about Yankees games that were played on TV while we played.

I was in high school when I heard the unfortunate news about him, and I was confused because that did not sound like the Parveg I knew. Parveg was known as one of the kindest and smartest kids in the neighborhood. He went above and beyond to tutor me in math and English to help me succeed academically, and I am grateful to him for this.

My recollections and encounters with Parveg have always been positive. He was always a good elder brother to his siblings and good to me. I understand the gravity of Parveg's charges, but I ask that you show some compassion for an error he made and I am confident he regrets his actions. I hope he can reconcile with his family as soon as possible.

Thank you,

Mazid Uddin

Mazid Uddin

Mizan Uddin

105-05 77th Street

Ozone Park, NY 11417

muddin8640@gmail.com

November 11, 2022

Re: Sentencing of Parveg Ahmed

Dear Judge Donnelly,

My name is Mizan Uddin and I grew up in the same neighborhood as Parveg Ahmed. I want to tell you about my experiences with Parveg Ahmed. I went to elementary school with his younger brother Ashfaq Ahmed and grew up alongside him. This has allowed me to get to know his family and see Parveg as I grew up. From what I can tell you, Parveg was like any other kid in the neighborhood. He was a fun person to be around from what I remember. I used to go over to Parveg's house to play baseball with his brothers and he would always play along with us. It was really fun playing baseball with him, and he was really knowledgeable about it as well. From what I remember he really loved baseball and football.

As I was growing up I got to know Parveg even better. He was really smart and I say that because of the way he carried himself. Parveg went to the specialized highschool Stuyvesant and you knew he was smart because of the difficulty of getting accepted. But he was still very

humble and did not brag about it. He ended up being my tutor in middle school and I really wanted to get into Stuyvesant. Parveg was able to teach me difficult mathematical equations and the English language. I am grateful for the time he took to teach me and his methods of teaching actually worked. I got into a specialized highschool as well, which was Brooklyn Tech. Even through the tough times he was having with his own education, he took the time to teach me. Which I will be forever grateful for.

My memories and experiences with Parveg have always been good. I believe he was a good older brother to his siblings growing up. I know he made a mistake and I definitely know he regrets his actions. I hope one day he is able to be reunited with his family and make amends.

Sincerely

A handwritten signature in cursive script that reads "Mizan Uddin".

Mizan Uddin

Naima Uddin

105-05 77th Street

Ozone Park, NY 11417

naima55uddin@gmail.com

November 11, 2022

Re: Sentencing of Parveg Ahmed

Dear Judge Donnelly,

Good afternoon, my name is Naima Uddin and I am a family friend of Parveg. Parveg has been a very beneficial and helpful person in my life. I remember him accepting to be my tutor through elementary school and helping me out with all the difficulties I've had with my classes and homework. After the first few weeks of being my teacher and helping me out, Parveg realized that I was a very energetic student and my attention span wasn't consistent. When he realized this, he always tried making our tutoring sessions fun and found a way to make it interesting. Him being my teacher has made a great impact on my life. Not only did I start improving in my classes along with getting better grades, but It also gave me the opportunity to realize that learning could be fun. I appreciate Parveg because while he was being my tutor he was going to

college during this time, but he took out the time to help me when he had his own classes and assignments.

As I was growing up his family and mine would always visit each other's houses. He was always a respectful, and caring person and was always looking out for everyone. Parveg would always look out for his brothers along with my own brothers. He would always offer to buy us stuff that we wanted along with helping us with whatever we needed help with.

Parveg has been a foundation to his family and an amazing older brother. I know he regrets what has happened and would love to come home to his family. I'm hopeful that he'll be able to do just that, reunite with his family and friends.

Warmest Regards,

A handwritten signature in black ink that reads "Naima Uddin". The script is cursive and fluid.

Naima Uddin

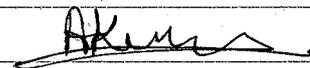
Assalamu Alaikum (peace be upon you),

Parveg is my cousin (son of maternal uncle). He is my younger brother. I met him when he went to the country. He is a man of beautiful and fascinating persona. Parvez is a gentleman and he loves everybody. He respects the elders and loves the younger ones. He respects all of us a lot. We have never witnessed anything bad in his manner. His manner is very good. His behavior or manner is excellent. Since he was immature, he made some mistakes without understanding. If he gets a chance, he will not make any sort of mistake like this. Please release him and give him a chance to correct his mistakes.

Aklima Khanam
Signature [illegible]

আস্হান্নাহু আল্লাইকুম,
দারভেত আছাৰ হান্নাত ভাই, হে আছাৰ
ছোট ভাই, হে যখন দেখে গৈছিল, তখন
দেখেছি। হে লুবিই এক জন ভাল এবং মায়াবি
মানুষ, হে আভিয় সতুন সবাইকে লুবি ভালবাসে,
হে বড় দেৰ অনেক কুৰ্বা করে এবং ছোট দেৰ
স্নেহ করে, আমাদেৰ সবাইকে অনেক সম্মান
করেছে, আমাৰা তার চলা ফেরা কখনও আমাৰা
দেখিনি, তার চলা ফেরা অস্তু ভাল, আমাৰা
দেখেছি তার ব্যবহার বা চলা ফেরা অনেক
ভাল, ছোটটি ছিল তাই না বুঝে ভুল্য করে
কলেছে, তাকে সুস্থেয় মেলে তার গুই
ভুল করতে না, দয়া করে তাকে আবার সুস্থ
করে ভুল সুস্থানুর সুস্থেয় দেওয়া হুইকে।

আকলিম আলম



Assalamu Alaikum (peace be upon you),

I would like to speak before all in favour of my nephew. I know Parveg, my nephew from his very childhood and he was a very good person since then. Once he came to the country of origin with his parents. At that time, I met him and he was very kind to me. He had shown a great respect to me. He talked with me in a very loving manner. Now I am seriously ill. I long for meeting my dear nephew Parveg and have a talk with him but I cannot. It was none other than Parveg who feels me the most. Now I am a victim of a fatal disease called cancer. I am not sure whether I shall live or die. My only desire is that I should be given a chance to have a talk with and scope to live with Parveg for all the time. I miss Parveg a lot. I would be very glad if this application made by a seriously ill person like me is granted. I would like to have my dear nephew Parveg to stay beside me.

(Roynab)

আয়ানা মু আল হুসাইন
 সবার কাছে আমি বলতে চাই আমার ভাই
 মুত এব কমা দারভেজ জকন হোট আইলা
 জকন তাকি আমি জানি আমার ভাই মুত
 অনেক ~~কিনা~~ বালা এক বার দেখে ও আইলা
 তান মা বাক অর লগে তখন আমার
 দারভেজ এ আমারে অনেক মামা করহন
 সম্মান ও করহন আমার লগে অনেক
 মামার মাত মাত হন একন আমি অনেক
 অসুখ আমার মন চাই আমার দারভেজ
 বে কেতাম মাতাম কিন্তু আমি দারি
 না আমার দারভেজ এ আমার যে কোন
 আমারে বুঝাই ~~কিনা~~ নিতা জ্বলত কতি একন
 আমি কয়ানজাব নামক মারাত্মক হোজে
 আক্রান্ত আমি বাইকু কিনা জানিনা আমার
 একটা ইচ্ছা আমার দারভেজ যেন আমার
 লগে মাতার বা আমার সব সমস্যা তাকার
 একটা সুযোগ দেয়া ওই আমি অনেক
 মিছ কবি দারভেজ বে আমার মুত
 এক জন অসুখ হোজি আবেদন তা
 গ্রহন করা অর্থাৎ আমি চাই, আর আমার
 দারভেজ আমার বান্ধাত আইতা

(বন্দন)

Mr. Honorable Judge,

I am the maternal aunt to Parveg speaking. As a man Parvez is excellent. I know him from his boyhood. When he visited the country of origin I found him to be very candid and simple. He was a very talented student. Even in his adulthood he had the simplicity of a child in him. He has made a mistake due to which he has been suffering from the alienation with his parents and family for 5 years. Now he strongly urges for getting back to his parents just like bird encaged with chains. His mother continues to crying for all day and night to have her own son beside her. Please help her get back to her normal course of life.

Sincerely

His maternal aunt Rozie

স্বাক্ষর জেড স্মাইল

আমি সারভেঞ্জ স্থান্য বলতেছি। সারভেঞ্জ
ফেলো ডিমেসে খুলে বোলো। তাকে ছোট্ট থেকে
জানি জানিন। দেহে এখন আমাছে এখন
দেখাছিলাম মে খুব জা সারভেঞ্জ সারিন,
মে খুব মেসেবি ছাত্র ছিল, এখন এখন
কি পরে এর সেরনতা ছিল সিমু সারভেঞ্জ,
মে একাধি খুল করে ফেলোছে এর সেরা
মে এ ছে বের। সা-বাকা, সারিবাকি ছাত্র
আছে। এখন মে এর সা বাকা কাছে
আমি আমাছে দেহা বসি ছে বাকা ছাত্র
সারভেঞ্জ সারভেঞ্জ করতেন। এর
সারভেঞ্জ ফেলো দেহা সারভেঞ্জ; সারভেঞ্জ
করতেন করতেন। তাকে খুলে ছিল দাস
করা হয়।

ইউ
এর সেরা সারভেঞ্জ

Assalamu Alaikum (peace be upon you),

Parveg is the son of my brother. I am his elder aunt (sister of his father). I met him when he went to the country. He is a man of beautiful and fascinating persona. Parvez is a gentleman and he loves everybody. He respects the elders and loves the younger ones. He respects all of us a lot. We have never witnessed anything bad in his manner. His manner is very good. His behavior or manner is excellent. Since he was immature, he made some mistakes without understanding. If he gets a chance, he will not make any sort of mistake like this. Please release him and give him a chance to correct his mistakes.

Jamila Khatun

আসসালামু আলাইকুম,
পারভেজ আম্মার ভাই মুত, আমি তার বড় ফুফু,
যে যখন দেখে গেছিল, তখন দেখেছি যে
মুতই এক জন ভাল এবং স্বাভাবিক মানুষ, যে
আত্মীয় সন্তান সবাইকে মূল ভালবাসে, যে বড়
দেব অনেক ঋণী করে এবং ছোট দেব স্নেহ
করে, আম্মাদের সবাইকে অনেক সম্মান করে।
আম্মারা তার চম্বা ফেরা কখনও আবাদ দেখিনি,
তার চম্বা ফেরা অল্প ভাল, আম্মারা দেখেছি
তার ব্যবহার মুতই ভাল ছিল, যে ছোট চিন
ভাই না বুঝে হুল করে ফেলেছে। যে
সুস্থ্য পালে আবেই হুল করবে না, দয়া
করে তাকে আবার সুস্থ্য করে হুল সুদরানুর
সুস্থ্য দেওয়া ইচ্ছা, ঈশ্বরা আম্মার।

Assalamu Alaikum (peace be upon you),

Parveg is my cousin. He is my elder brother. He is very good. I found him to be very nice when he went to the country. His behaviour is very good. He is very loving. Very easy-going and simple. He has a very good mentality. We heard that his conduct is very good. He always respects everyone. We always thought that we would hang out with our brother, have a lot of fun and shall enjoy a lot when we shall be in America. But I don't know why or for what reasons we could not share our joy with him. Everyone makes mistakes. Maybe my brother made a mistake too. Please forgive him. When we all go out for a walk together, we miss him a lot and it hurts us much. Every day it seems that maybe today our brother will come back. I want my brother to be given a chance. I am begging you to let him get back to us.

(Jumi)

আজ্ঞানায়ু আলাইকুম,
 দারুলেদ্র আছাতু মাছাত তাই, যে আছাতু
 বড় তাই যে আবেক জানো যে যখন
 দোমে জিন্দেহিন তখন দেখেছি যে পুট
 জানো তার ছে হারু আবেক জানো যে
 পুটই আছাতু পুটই অইত অকুল আবেক
 জানো হাবের অধিকারি আছাতু আবেক
 তার চলা ফেরা আবেক জানো যে অর অকুল
 অচাই কে অকুল করে অর অকুল চিন্তা
 করু হাছ আছাতু আছাতু তাই আছে
 আবেক যুগা যুগি করু আবেক হাছা
 করু আবেক আবেক বাহুট কিন্তু যাবি
 বা কেন বা কিন্তু আছাতু আছে আবেক
 বাহা বাহি করুত দারি বা অচাইত
 কুল করে/হুত আছাতু তাই একট কুল
 করু হাছে সিলিড হাছ কুলে ডেব ।
 আছাতু যখন অচাই এক আছে বাহিরে
 বেলাত তাই তখন আবেক হাছ আছ
 কুল লাগে । প্রতিদিন মনে আছ আছ
 আছাতু তাই চলে আছাতু আছি তাই
 আছাতু তাই কে একট সুযোগ করে দেব
 আছাতু হাছে ফিরিয়ে দেয়া কুল
 আকুল আবেক !

(স্বাক্ষর)

Mr. Honourable Judge,

I am the next door neighbour to Parveg and having a sisterly relationship with him. I know him from his childhood. He was very good in his study. They are four brothers and all of them are nice persons. However, unfortunately he has made a mistake though without intention. Now, I confirm he will stay tuned in his conduct. Please be merciful to him. This is all I request you about. Here ends this letter.

Rohima

মাননিও মিস্টার ডাড সাহেব

আমি মার্কসেজ পড়া প্রতি বেলী বোম

আমি ওহায়দে ছেটে মোক চিনি ও

মুহ-ভোল নেয়া পড়ায় আলফ ভোল

ছিল-। ওহায় হেয় ভাই ওহায়দে মাসাই

মুহ-ভোল, কিন্তু হুদে মিস্টার

যুখে ভুল করত ফালদে, প্রচলন

আমি বন্দুচি-হে ভোল হুয়ে চলায়

ওহায়দে দয়া ভায়ন বই ওহায়

আমি মিস্টার ডাড সাহেব

মাহিম

Assalamu Alaikum (peace be upon you),

Parveg is my maternal cousin. Once he visited the country of origin and I know and understand him very closely since the time. He is very good. Since the time I reached here, I always thought that he would show love and affection to us, would spend time with us, we shall enjoy our time together. But I don't know why we cannot share our joys with him. Everyone makes mistakes. Maybe my brother has made a mistake too. Should that be made a point to keep us separated from our brother for so long a time! We feel so bad about the fact. Wherever we go, we feel that our brother is not with us. We all miss our brother a lot in every move we make in our life. Every day we hope to see our brother come back to us but that does happen. I including all in our family want to see my brother come back to us. I and all in my family urge that my brother should be given a chance.

(Shammi)

আজ্ঞামান্নু আল্লাইয়ুফুহা,
 সার্বভৌম আম্মারু ইয়াহাও তাই যে স্বকণ্ঠে
 দেবে জিহ্বাহিন তাই সার্বভৌম থেকে অস্তিত্ব
 কাছ থেকে থাকে হিনি বা মানি যে
 আল্লাহ জালি স্বা স্বময় চিন্তা করতায়
 প্রমাণে আম্মারু সার্ব ও জাযতায় আম্মারা
 আম্মাদেও আদয় করতে হয় করতে
 আম্মাদেও সাথে যুগ্মে আম্মাদেও নিয়ে
 আল্লাহ আনন্দ করতে কিন্তু মানি না
 কেন আম্মাদেও তাই সাথে আম্মাদেও
 আনন্দ বাস বাস করতে পারি না
 স্বাভাবিক ভুল করে আম্মারু তাই ও স্বাভাবিক
 প্রকটা ভুল করেছে তাই জন্য কি
 আম্মারা আম্মারু তাইর কাছ থেকে
 প্রত্য দিন আল্লাহ থাকবে আল্লাহ
 প্রার্থনা নাও স্বাভাবিক এক সাথে বসলে
 যা কোথাও গেছে যে আম্মারু তাই তা
 আম্মাদেও সাথে বাই মাই করি না কেন
 আম্মাদেও স্বাভাবিক আম্মাদেও তাই চাঁকে আল্লাহ
 বোধি স্থি করি প্রতিদিন হবে হয়
 আজ আম্মাদেও তাই চলে আম্মারে কিন্তু
 আম্মাদেও তাই ওগামে না । আম্মি বা
 আম্মারা স্বাভাবিক চাই আম্মারু তাই আম্মাদেও
 স্বাক্ষর করে আম্মুক । আম্মি বা আম্মারা
 চাই আম্মারু তাই কে প্রকটা স্বাভাবিক দেওয়া হয়

(স্বাক্ষর)

CERTIFICATE OF COMPLETION

PRESENTED TO

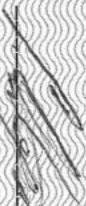
PARVEG AHMED

REGISTER # 81364-053

FOR COMPLETION OF BASIC COGNITIVE SKILLS FOR MEN
METROPOLITAN DETENTION CENTER, BROOKLYN, NY

THIS CERTIFICATE IS HEREBY ISSUED ON JUNE 8, 2018

C. ORTEGA, PH.D.



CHIEF PSYCHOLOGIST



N. APOLFEON, PSY.D., MPH



STAFF PSYCHOLOGIST



U.S. Department of Justice
Federal Bureau of Prisons

Certificate of Completion

We present this Certificate to

Parwey Ahmed

Tutor Training
*Teacher-led training developed by the
Education Department at MDC Brooklyn*

D Greco

D Greco- Teacher
March 30, 2022



MDC Brooklyn

Recreation Department

This is to Certify that

Parveg Ahmed

Has Successfully Completed:

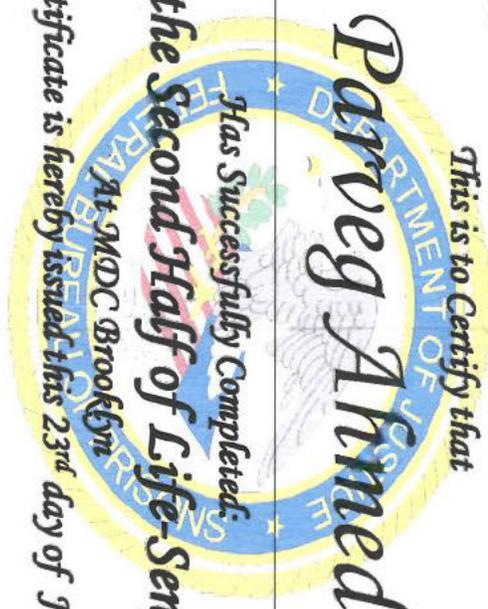
Enjoying the Second Half of Life-Sentry Course

At MDC Brooklyn

This certificate is hereby issued this 23rd day of July 2021

D. Fulmore

Recreation Specialist



MDC Brooklyn

Recreation Department

This is to Certify that

Parveq Ahmed

Has Successfully Completed

Sentry Weight Management Journal

At MDC Brooklyn

This certificate is hereby issued this 2nd day of April, 2021

D. Fulmore

Recreation Specialist



U.S. Department of Justice
Federal Bureau of Prisons

Certificate of Completion

We present this certificate to

PARVEG AHMED

Financial - Modified Operations

Define Yourself Before You are Defined

Dr. M. Gantt

Dr. M. Gantt – Supervisor of Education
Metropolitan Detention Center



J. Murray

Mr. Murray - Teacher
July 20, 2020



U.S. Department of Justice
Federal Bureau of Prisons

Certificate of Completion

We present this certificate to

PARVEG AHMED

Resume Writing-Modified Operations

Define Yourself Before You are Defined

Dr. M. Gantt

Dr. M. Gantt – Supervisor of Education
Metropolitan Detention Center



A. Devastey

Mr. A. Devastey - Teacher
June 26, 2020





**U.S. Department of Justice
Federal Bureau of Prisons
MDC Brooklyn Education Department**

*Presents this Certificate of Completion
to*

Parveeg Ahmed

In recognition of your completion of self-study course

Health Course Blood Pressure

A handwritten signature in blue ink, appearing to read "C. Bramble".

C. BRAMBLE, EDUCATION TECHNICIAN

MAY 13, 2020

March 18th, 2022

Dear Honorable Judge

My name is Emmanuel Barrientos. I am the designated Tutor of Unit #63, here, at MDC Brooklyn. I am writing you today, your honor, to tell you about the wonderful & truly generous person that my friend Ahmed has proven to be. Not only has he taken charge of Tutoring in GED, while not having been made an official Tutor yet (though he is more than Qualified), but in teaching other classes, like Arabic & Islamic studies, fulfilling the vital role of Imam for the Muslims in the community & being an outstanding example of what it means to be of a strong, compassionate character.

Ahmed, ma sha Allah, is truly blessed with a great mind that is coupled with a caring heart. From the moment that our facility re-opened (after a nearly two month lock down) he jumped on into the

role as Tutor in Math & Social Studies for our GED curriculum within our Unit. I've witnessed students grasping concepts, because of his instruction, that the student said no other teacher could get through to them. I may be the "official" Tutor for our Unit but without Ahmed I would not be able to do it alone.

By the blessing of God I have had the opportunity to not only work along side Ahmed as associates but also as his student. I have been attending his Arabic class & Islamic studies class. I am the only christian student within these classes & yet Ahmed has treated me with the highest respect, no different then how he acts with any of the other students. If not for Ahmed's concise methods & patience it would have taken me months to learn what he taught me in just a few weeks. Ahmed is an example for me & all others to learn from as to what it means to use your

God given gifts for the Good of all.

Your honor, thank you for taking the time to read about how Ahmed is changing lives every single day within our Unit 3, ultimately, the world. I can say that I have witnessed, right here, under these harsh conditions that we face everyday, of what Ahmed contributes to any community he is 3, will be a part of in the future.

Blessings,

Emmanuel ^{7:14} ^{Is}

Emmanuel Barrientos
A/V Project Manager
USMC LCPL
Seventh Day Adventist*

Hon. Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

December 04, 2022

Dear Judge Donnelly,

My name is Dilshod Khusanov, Reg. #52578424. I met Parveg Ahmed in MDC Brooklyn, NY and have known him for almost five years. During this time he went through a substantial transformation. His zeal and passion for learning and improving helped him mature and grow into solid, responsible and productive individual.

Parveg is very considerate and generous person. He is always calm and composed. One can hardly see him angry or off balance. When he speaks, he meticulously chooses his words to make himself understood and almost always speaks to the point. His caring for people and being attentive to their needs earned him a lot of respect and love.

Like many other people in here, I've been impressed with Parveg's good qualities, especially with his capacity for forbearing and patience.

It was our congregational prayer time. People were getting prepared and coming into the prayer room. Suddenly, one of the guys snapped and started yelling at Parveg. I did^{not} understand what was going on at that time and just watched things unfolding. To his unceasing scolding Parveg briefly and calmly

Although it is the same person who made that wrong decision which brought him here, spiritually, mentally and most importantly intellectually it is a totally different person who will be standing in front of you and at your mercy on the sentencing day.

I respectfully ask this court to be compassionate towards Parveg, to this penitent and changed young man, and help him reunite with his family soon.

Sincerely,

Dilshod Khusanov

A handwritten signature in blue ink, appearing to be 'Dilshod Khusanov', written in a cursive style.

To Whom it May Concern:

I'm writing this letter on behalf of Parveg Ahmed #81364-053. I met Ahmed in MDC Brooklyn about a year or so ago. I soon found out why he was incarcerated and became curious as of what was his intention and started asking a lot of questions. We soon became friends and even though I'm a Christian and he a Muslim I realize that Ahmed was very opened minded to what I had to say and we agree in a lot of subjects. He seems very remorseful of the choices he made even stating to me that given a chance he would do things very different.

After being around Parveg Ahmed for about a year, I've notice that he is very honest, responsible and morally consistent. I hope this letter however brief will help the Court make a just decision.

Sincerely Yours,


Victor Almonte
#37693509



11/29/2022

Fahim Ahmed
9720 76th St
1st Fl
Ozone Park NY 11416

RE: 08045003

To Whom It May Concern:

Parveg enrolled in the Blackstone Career Institute's Paralegal Career Training program on 11/15/2020. He completed his studies on 12/07/2021. He completed 31 exams and 6 homework assignments available in the program and graduated with a 97.74% grade average.

Blackstone Career Institute is nationally accredited by the Distance Education Accrediting Commission (DEAC) and regionally accredited by the Middle States Commission on Secondary Schools. Blackstone is also licensed by the State Board of Private Licensed Schools, Commonwealth of Pennsylvania.

If you have any questions or need additional information, please contact our office.

*For faster communication with the school, we also correspond through CorrLinks. You may request our school using our email: info@blackstone.edu. We will accept your request as soon as possible.

Sincerely,

Elaine Smith
Student Services Advisor





Unofficial Student Transcript
31 Lesson Legal Assistant/Paralegal Certificate Program
915 Clock Hours

Student Parveg Ahmed 81364053
Address: M.D.C. Brooklyn
PO Box 329002
Brooklyn NY 11232

Student Number: 08045003
Enrollment Date: 11/15/2020
Completion Date: 12/07/2021
Status Date: 12/07/2021
Student Status: Graduated

Table with columns: Text/Subject, Date Completed, Grade, Text/Subject, Date Completed, Grade. Contains 31 lessons with subjects like Introduction To Law, Contracts, Law of Torts, Criminal Law, Real Property, Pleadings, Wills, and Constitutional Law.

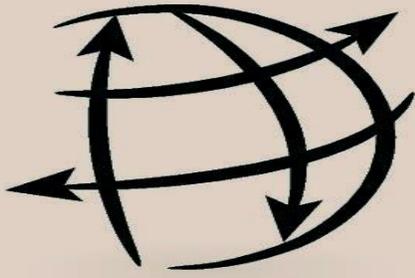
Student Average: 97.74% ** FINAL **

This Document Issued: 11/29/2022

Blackstone Career Institute

By: Valerie L. Behrle B.S., M.Ed. Registrar





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06/24/2022

Re: Ahmed, Parveg
DOB: 06/15/1995

This letter is meant to confirm that the above-named client, Mr. Parveg Ahmed, is currently engaged in counseling services with this provider. Client began services with this provider as of 04/12/2021. Individual counseling sessions are being conducted on a weekly basis via the Metropolitan Detention Center's (MDC) video- and tele-conferencing system.

Notwithstanding client's current placement in a controlled detention center, he has been fully compliant with his treatment schedule as evidenced by his meaningful participation in each scheduled session and expressed willingness to engage in these counseling services.

Client's weekly sessions are predominantly focused on his thinking processes in order for clinician to assist client in better decision-making processes, and judgement within a reality-based thinking framework.

Clinician utilizes a motivational enhancement and client centered therapy model for purposes of allowing client to further delineate and verbalize his authentic plans to disavow any further association with violence-inspired and jihadi association and sympathies. Client, Parveg Ahmed, has been quite willing to engage in this work and makes ample use of his refined understanding of his religion to disavow violence-inspired overtures.

Since beginning his treatment, client has presented as being open and honest in discussing his predicament and makes productive usage of his counseling sessions by reviewing and speaking about his past actions. Client, Parveg Ahmed, also appears to be taking measured steps to disassociate himself from all types of violent ideologically-driven and jihadi movements as he has been incarcerated at MDC. Client has committed himself to those actions vis-à-vis his positions (Imam) within the MDC and as an individual person of faith.



Client's treatment plan is focused on assisting him with developing a fully worked-through plan to prevent any sort of drift back towards or association with violent and terrorist-linked elements. Client has expressed agreement with his treatment plan, and is eager to keep working towards his rehabilitation.

In the event of client being granted bail, it is strongly recommended that client engage in ongoing counseling for an indeterminate period of time with a provider that understands the cultural framework of client's background. In addition, it should be a provider that has a willingness to engage in ongoing monitoring and review of client's overall level of functioning in order to safeguard client's commitment to leading a violence-free lifestyle. This clinician would be available to continue this work with client if granted bail. However, client should also be engaged in a variety of other concrete services focused on vocational development, educational enhancement, adherence with legal compliance, and pro-social positive community involvement.

Please feel free to call the number below should there be any questions and/or concerns.

Respectfully,

Dmitri Oster, LCSW, EMDR II,...
United Consulting Services
718-233-2533



*PO Box 212979
Royal Palm Beach, FL 33421*

December 6, 2022

Hon. Ann Donnelly
Judge, United States District Court
Eastern District of New York

RE: United States vs. Parveg Ahmed, Case. No. 1:17CR00378-001

Hon. Donnelly,

I was retained by Michael Schneider and Sabrina Shroff to work with Parveg Ahmed who is currently incarcerated at the Metropolitan Detention Center charged with providing material support to a foreign terrorist organization.

I am licensed as a mental health counselor in Florida and New York and have 25 years of experience working with a diverse forensic population in mitigation, sentencing and counseling.

In this case I was retained as an independent therapeutic counselor to work with Mr. Ahmed and coordinate his treatment with the DEEP Program. DEEP is a program created by the Citizens Crime Commission of New York City. Utilizing research that studies the progression of extremism DEEP has created a standardized approach to reducing and managing the risk for extremist violence. Like most, the approach is intended to be highly individualized and tailored to address the individual reasons why a person engaged in or attempts to engage in extremist activities.

Normed therapeutic goals are established to help clients develop skills intended to reduce risk, facilitate reactions to life stressors and to improve emotional and social functioning. I was tasked with assessing Mr. Ahmed's progress and continuing counseling with him. Mr. Ahmed is aware that his participation in these counseling sessions is voluntary. His response to therapy has been positive. He has been engaged in the process and eager to learn even when the topics being covered are difficult. We have met both in person and virtually weekly since October 7, 2022.

In preparing to work with Mr. Ahmed I spoke with defense counsel, reviewed the indictment and a limited amount of discovery in the case. I also reviewed the reports prepared by Dr. Kostsavidis and the therapy notes of prior providers, including Mr. Dmitri Oster and Rebecca Weiser.

Utilizing a pro-integration model, my work with Mr. Ahmed has been focused on social relations, coping, identity, and ideology. Included in this list is a discussion of the offense conduct, the decisions he made 5 years ago and the impact those decisions have had on him, his family, and the impact his offense conduct will have on his future. Mr. Ahmed recognizes that he will have to adjust to life as a felon and the hurdles that come with that history.

Mr. Ahmed presents as a thoughtful and polite client. He is open to receiving feedback and engages in a positive way when challenged. Mr. Ahmed has a very structured idea of what he wishes to accomplish in his future post incarceration. He is able to discuss his goals and is open to modification of those goals which is a sign of growth and acceptance of change. He has come to recognize the familial traumas and has attempted to learn how they impacted his behaviors. Based on my experience it is uncommon for clients to share their traumas easily. Mr. Ahmed's ability to discuss his traumas shows the amount of work he has put in and the recognition that he needs to understand the traumas to heal. I am encouraged by his openness and progress in this area.

Mr. Ahmed comes from a family of four boys and his parents are immigrants from Bangladesh. Mr. Ahmed, I have discussed the family dynamics, and cultural expectations that led to his isolation, vulnerability, and depression. We have talked about, and he has started to have a more honest and open dialogue with his family during his incarceration. He recognizes that he needs to be able to set boundaries and recognize triggers as he continues therapy. Mr. Ahmed's brother plays a significant role in the family dynamics. Mr. Ahmed's ability to discuss the issues with his brother and communicate his feelings is a sign of progress.

Mr. Ahmed continues to delve into some of familial issues, identity issues and other and patterns of behavior which had been unexplored. In coordination with the Federal Defenders office and the Department of Probation, it is my understanding that Mr. Ahmed has a re-entry plan that will follow his release from a half-way house. I will continue to provide therapy for Mr. Ahmed until he is sentenced. Mr. Ahmed will also receive support and supervision from the Department of Probation.

Respectfully submitted,



Lisa McDermott
LMHC NY #010812