

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TAREK BAZROUK,

Defendant.

SEALED INDICTMENT

25 Cr.

25 CRIM 203

COUNT ONE
(Hate Crime Act)

The Grand Jury charges:

1. On or about April 15, 2024, in the Southern District of New York and elsewhere, TAREK BAZROUK, the defendant, willfully caused bodily injury to a victim ("Victim-1") because of Victim-1's actual and perceived race, Victim-1's actual and perceived religion, and Victim-1's actual and perceived national origin, to wit, BAZROUK kicked Victim-1 in the chest, at a protest where Victim-1 was standing with individuals wearing kippahs, carrying Israeli flags, and singing Jewish songs, causing injury to Victim-1.

(Title 18, United States Code, Section 249(a)(1)(A).)

COUNT TWO
(Hate Crime Act)

The Grand Jury further charges:

2. On or about December 9, 2024, in the Southern District of New York and elsewhere, TAREK BAZROUK, the defendant, willfully caused bodily injury to a victim ("Victim-2") because of Victim-2's actual and perceived race, Victim-2's actual and perceived religion, and Victim-2's actual and perceived national origin, to wit, BAZROUK punched Victim-2 in the face, at a protest where Victim-2 was wearing a kippah and had an Israeli flag draped

around his shoulders, causing bodily injury to Victim-2.

(Title 18, United States Code, Section 249(a)(1)(A).)

COUNT THREE
(Hate Crime Act)

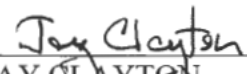
The Grand Jury further charges:

3. On or about January 6, 2025, in the Southern District of New York and elsewhere, TAREK BAZROUK, the defendant, willfully caused bodily injury to a victim ("Victim-3") because of Victim-3's actual and perceived race, Victim-3's actual and perceived religion, and Victim-3's actual and perceived national origin, to wit, BAZROUK punched Victim-3 in the face, at a protest where Victim-3 was wearing an Israeli flag around his shoulders and a chain with a Jewish star around his neck, causing bodily injury to Victim-3.

(Title 18, United States Code, Section 249(a)(1)(A).)



FOREPERSON



JAY CLAYTON
United States Attorney