

**Dec 20, 2018**

STEVEN M. LARIMORE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**18-60352-CR-MOORE/SNOW**  
CASE NO: \_\_\_\_\_

18 U.S.C. § 842(p)(2)(A)

**UNITED STATES OF AMERICA**

**vs.**

**TAYYAB TAHIR ISMAIL,**

**Defendant.**

\_\_\_\_\_ /

**INDICTMENT**

The Grand Jury charges:

**COUNT 1**

**Distributing Information  
Pertaining to Explosives  
(18 U.S.C. § 842(p)(2)(A))**

On or about July 15, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled "T.E.C.," with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 2**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about July 16, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled “A.C.,” with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 3**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about July 16, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled “A.C. Ver. 2000,” with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 4**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about August 23, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled “B.b.C.S.O.T.A.I.M.,” with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 5**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about September 17, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**


did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a video depicting step-by-step instructions on how to construct a bomb, with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code,

Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

A TRUE BILL

FOREPERSON

  
\_\_\_\_\_  
ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
KAREN E. GILBERT  
ASSISTANT UNITED STATES ATTORNEY



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** Tayyab Tahir Ismail

**Case No:** \_\_\_\_\_

Counts #: 1-5

Distributing Information Pertaining to Explosives

Title 18, United States Code, Section 842(p)(2)(A)

**\*Max. Penalty:** 20 Years' Imprisonment

Count #:

\_\_\_\_\_  
\_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count #:

\_\_\_\_\_  
\_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count #:

\_\_\_\_\_  
\_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**