Case 0:18-cr-60352-KMM Document 14 Entered on FLSD Docket 12/21/2018

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 A | MERICA |
|--------|---------------|------|--------|
| | DIALLO | OI A | |

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

 $(18 \text{ U.S.C. } \S 842(p)(2)(A))$

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, Section 842(p)(2)(A) and 844(a)(2).

COUNT 4

Distributing Information Pertaining to Explosives

 $(18 \text{ U.S.C. } \S 842(p)(2)(A))$

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, Section 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. OIDBERT

ASSISTANT UNITED STATES ATTORNEY

| UNITED STATES OF AMERICA v. TAYYAB TAHIR ISMAIL, Defendant. / Court Division: (Select One) | | TES OF AMERICA | CASE NO. CERTIFICATE OF TRIAL ATTORNEY* Superseding Case Information: | |
|--|--|--|---|--|
| | | R ISMAIL, | | |
| | | Defendant/ | | |
| | | n: (Select One) | New Defendant(s) Yes No | |
| X | Miami FTL | Key WestFTP | Total number of counts | |
| | I do he | reby certify that: | | |
| | 1. | I have carefully considered the of probable witnesses and the le | allegations of the indictment, the number of defendants, the number egal complexities of the Indictment/Information attached hereto. | |
| | 2. | I am aware that the information Court in setting their calendars Act, Title 28 U.S.C. Section 31 | n supplied on this statement will be relied upon by the Judges of this and scheduling criminal trials under the mandate of the Speedy Trial 61. | |
| | 3. | Interpreter: (Yes or No) List language and/or dialect | <u>No</u> | |
| | 4. | This case will take 5 | days for the parties to try. | |
| 5. Please check appropriate category and type of offense listed below: | | ory and type of offense listed below: | | |
| | | (Check only one) | (Check only one) | |
| | I II III IV V | 0 to 5 days 6 to 10 days 11 to 20 days 21 to 60 days 61 days and over | X Petty | |
| If yes: Judge: | | Has this case been previously fi | iled in this District Court? (Yes or No) No | |
| | | | Case No. | |
| | Has a c If yes: | a copy of dispositive order) complaint been filed in this matte | er? (Yes or No) <u>Yes</u> | |
| | Related Defend Defend Rule 20 | rate Case No. I Miscellaneous numbers: lant(s) in federal custody as of dant(s) in state custody as of I from the District of a potential death penalty case? (Y | 18-mj-06588-Hunt 12/14/2018 Yes or No) No | |
| | 7. | Does this case originate from a prior to October 14, 2003? | matter pending in the Northern Region of the U.S. Attorney's Office Yes No _X | |
| | 8. | Does this case originate from a prior to September 1, 2007? | watter pending in the Central Region of the U.S. Attorney's Office Yes No X KAREN E. GICBERT ASSISTANT UNITED STATES ATTORNEY | |

FL Bar No. 771007

*Penalty Sheet(s) attached

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 #: |
| |
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| *Max. Penalty: |
| Count #: |
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| |
| *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.