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U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES
BY _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
February 2011 Grand Jury

11	UNITED STATES OF AMERICA,)	CR No. 11-833(A)-JHN
12	Plaintiff,)	
13	v.)	<u>F I R S T</u>
14	OYTUN AYSE MIHALIK,)	<u>S U P E R S E D I N G</u>
15	aka "Ayse Oytun Akin,")	<u>I N D I C T M E N T</u>
16	aka "Ayse Mihalik,")	
17	aka "Cindy Palmer,")	[18 U.S.C. § 2339A: Providing
18	Defendant.)	Material Support to Terrorists;
)	18 U.S.C. § 1001(a)(2): False
)	Statement]

The Grand Jury charges:

COUNTS ONE through THREE

[18 U.S.C. § 2339A]

On or about the following dates, in Orange County, within the Central District of California, defendant OYTUN AYSE MIHALIK, also known as ("aka") "Ayse Oytun Akin," aka "Ayse Mihalik," aka "Cindy Palmer," provided and attempted to provide material support and resources, specifically, money, intending that it be used in preparation for and in carrying out violations of Title 18, United

1 States Code, Section 1114 (attempts to kill officers and employees
2 of the United States and of an agency of the United States
3 Government, specifically, United States military personnel, while
4 such officers and employees were engaged in, and on account of the
5 performance of, their official duties) and Title 18, United States
6 Code, Section 956 (conspiracy to commit at a place outside the
7 United States an act that would constitute the offense of murder,
8 kidnapping, or maiming, if committed in the special maritime and
9 territorial jurisdiction of the United States, where one of the
10 conspirators committed an act within the jurisdiction of the
11 United States to effect an object of the conspiracy):

<u>Count</u>	<u>Date</u>	<u>Activity</u>
12 ONE	December 21, 2010	Sent \$750 to an individual in Pakistan
14 TWO	December 29, 2010	Sent \$600 to an individual in Pakistan
16 THREE	January 11, 2011	Sent \$700 to an individual in Pakistan

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COUNT FOUR

[18 U.S.C. § 1001(a)(2)]

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3 On or about August 8, 2011, in Los Angeles County, within the
4 Central District of California, in a matter within the
5 jurisdiction of the Federal Bureau of Investigation ("FBI") and
6 the Department of Homeland Security, Homeland Security
7 Investigations ("HSI"), namely, an interview with Special Agents
8 of the FBI and HSI at Los Angeles International Airport ("LAX"),
9 defendant OYTUN AYSE MIHALIK, also known as ("aka") "Ayse Oytun
10 Akin," aka "Ayse Mihalik," aka "Cindy Palmer" ("defendant
11 MIHALIK"), knowingly and willfully made material false,
12 fictitious, and fraudulent statements and representations in a
13 matter involving international terrorism, as defined in 18 U.S.C.
14 § 2331.

15 Specifically, defendant MIHALIK stated in the interview that:
16 (1) she had never used a name other than "Oytun Mihalik" or a
17 similar name when using Western Union to send money to a person
18 who was overseas; and (2) she had sent money only once via Western
19 Union to a person who was overseas.

20 These statements and representations were false, fictitious,
21 and fraudulent because, as defendant MIHALIK well knew when she
22 made the statements during the interview at LAX, in fact the
23 following was true: (1) defendant MIHALIK had used the alias
24 "Cindy Palmer" when sending money via Western Union to a person
25 who was overseas; and (2) defendant MIHALIK had sent money more
26 than once via Western Union to a person who was overseas.

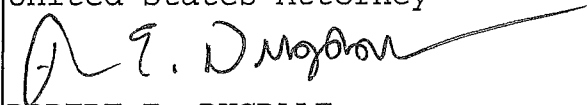
27 These false, fictitious, and fraudulent statements and
28 representations were made in a matter involving international

1 terrorism, as defined in Title 18, United States Code, Section
2 2331, namely, a matter involving acts that: (1) are violent and
3 dangerous to human life; (2) would be violations of the criminal
4 laws of the United States or of any State if the acts occurred
5 within the jurisdiction of the United States or of any State;
6 (3) are intended to intimidate and coerce a civilian population,
7 influence the policy of a government by intimidation and coercion,
8 and affect the conduct of a government by mass destruction,
9 assassination, and kidnapping; and (4) occur primarily outside the
10 territorial jurisdiction of the United States.

11 A TRUE BILL

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13 151
14 Foreperson

15 ANDRÉ BIROTTE JR.
16 United States Attorney

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18 ROBERT E. DUGDALE
19 Assistant United States Attorney
20 Chief, Criminal Division

21 PATRICK R. FITZGERALD
22 Assistant United States Attorney
23 Chief, National Security Section

24 JUDITH A. HEINZ
25 Assistant United States Attorney
26 Deputy Chief, National Security Section
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