

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 1:12-cr-00033-JLK

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. JAMSHID MUHTOROV,

2. BAKHTIYOR JUMAEV,

Defendants.

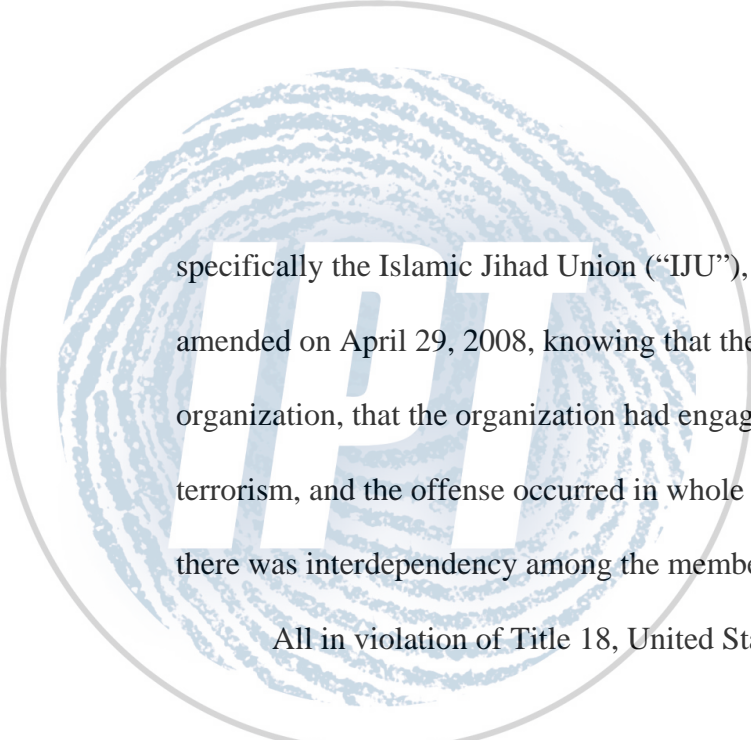
SECOND SUPERSEDING INDICTMENT

18 U.S.C. § 2339B - Material Support of a Designated Foreign Terrorist Organization
and Attempt and Conspiracy to do the Same

COUNT 1

The Grand Jury charges that:

Between and on or about January 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendants, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”; and Bakhtiyor Jumaev, a/k/a “Abu Bakr”, together with others both known and unknown to the Grand Jury; did knowingly conspire, combine, confederate, cooperate and agree with each other to provide and attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: property [at least \$300 in currency], to a foreign terrorist organization,



specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States; and, further there was interdependency among the members of the conspiracy.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 2

The Grand Jury further charges that:

Between and on or about January 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendants, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”; and Bakhtiyor Jumaev, a/k/a “Abu Bakr”, together with others both known and unknown to the Grand Jury; did knowingly provide and attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: property [at least \$300 in currency], to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 3

The Grand Jury further charges that:

Between and on or about March 8, 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendant, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”, together with others both known and unknown to the Grand Jury; did knowingly provide and attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit:

knowingly providing one or more personnel (who may be or include oneself) to the Islamic Jihad Union (“IJU”) to work under the IJU’s direction and control, to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 4

The Grand Jury further charges that:

Between and on or about January 30, 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendant, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”, together with others both known and unknown to the Grand Jury; did knowingly provide and attempt to provide material

support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: communications equipment and services, to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States.

All in violation of Title 18, United States Code, Section 2339B.

TRUE BILL

Ink signature on file in the clerk’s office
FOREPERSON

JOHN F. WALSH
United States Attorney

By: s/ Gregory Holloway
GREGORY HOLLOWAY, WSBA #28743
Assistant United States Attorney
United States Attorney’s Office
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Denver, Colorado 80202
Telephone: (303) 454-0100
Facsimile: (303) 454-0406
Email: Gregory.Holloway@usdoj.gov
Attorney for the United States

INFORMATION SHEET

DEFENDANT

JAMSHID MUHTOROV,

YEAR OF BIRTH:

1976

ADDRESS:

In Custody

COMPLAINT FILED?

 X YES NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 1:12-mj-001011-CBS

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? YES

OFFENSE:

Counts 1 through 2: 18 U.S.C. § 2339B:
Material Support of a Designated Foreign Terrorist Organization
and Conspiracy and Attempt to do the same

LOCATION OF OFFENSE: Arapahoe County, Colorado.

PENALTY:

Counts 1 through 4: NMT 15 years imprisonment; \$250,000 fine,
or both; NMT 5 years supervised release; \$100.00 Special
Assessment Fee; and restitution

AGENTS:

Donald Hale, Special Agent FBI

AUTHORIZED BY:

Gregory Holloway, Assistant United States Attorney

ESTIMATED TIME OF TRIAL:

 five days or less X over five days other

THE GOVERNMENT

 X will seek detention in this case will **not** seek detention in this case

The statutory presumption of detention **is** applicable to this defendant.

OCDETF CASE:

 Yes X No

INFORMATION SHEET

DEFENDANT

BAKHTIYOR JUMAEV,

YEAR OF BIRTH:

1966

ADDRESS:

Philadelphia, PA

COMPLAINT FILED?

☒ YES ☐ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 12-mj-01039-KLM

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?

OFFENSE:

Counts 1 through 2: 18 U.S.C. § 2339B:

Material Support of a Designated Foreign Terrorist Organization
and Conspiracy and Attempt to do the same

LOCATION OF OFFENSE: Arapahoe County, Colorado.

PENALTY:

Counts 1 through 2: NMT 15 years imprisonment; \$250,000 fine,
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ESTIMATED TIME OF TRIAL:

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THE GOVERNMENT

☒ will seek detention in this case ☐ will **not** seek detention in this case

The statutory presumption of detention **is** applicable to this defendant.

OCDETF CASE:

☐ Yes ☒ No