

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

ORIGINAL  
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UNITED STATES DISTRICT COURT CLERK  
WESTERN DISTRICT OF NEW YORK

*for the Western District of New York*

AUG 12 2015

NOVEMBER 2014 GRAND JURY  
(Impaneled 11/07/2014)

BY:



THE UNITED STATES OF AMERICA

15 CR 148 - A

-VS-

INDICTMENT

ARAFAT M. NAGI

Violations:  
Title 18, United States Code,  
Section 2339B(a)(1)  
(2 Counts)

COUNT 1

(Attempt to Provide Material Support to a Foreign Terrorist Organization)

**The Grand Jury Charges That:**

From in or about November 2012 to in or about August 2014, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, ARAFAT M. NAGI, a citizen of the United States, knowingly did attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), that is, personnel, specifically himself, to a designated foreign terrorist organization, namely, the Islamic State of Iraq and the Levant ("ISIL") a/k/a the Islamic State of Iraq and Syria ("ISIS") a/k/a ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, knowing that ISIL/ISIS was a designated foreign terrorist organization, had engaged, and was engaging, in terrorist activity, as that term is defined in Title 8, United States Code,

Section 1182(a)(3)(B), and had engaged, and was engaging in, terrorism, as that term is defined in Title 22, United States Code, Section 2656f(d)(2).

**All in violation of Title 18, United States Code, Section 2339B(a)(1).**

**COUNT 2**

**(Attempt to Provide Material Support to a Foreign Terrorist Organization)**

**The Grand Jury Further Charges That:**

From in or about early 2015, the exact date being unknown, and continuing to on or about July 29, 2015, in the Western District of New York, the defendant, **ARAFAT M. NAGI**, a citizen of the United States, knowingly did attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), that is, personnel, specifically himself, to a designated foreign terrorist organization, namely, the Islamic State of Iraq and the Levant (“ISIL”) a/k/a the Islamic State of Iraq and Syria (“ISIS”) a/k/a ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, knowing that ISIL/ISIS was a designated foreign terrorist organization, had engaged and was engaging in terrorist activity, as that term is defined in Title 8, United States Code, Section 1182(a)(3)(B), and had engaged, and was engaging in, terrorism, as that term is defined in Title 22, United States Code, Section 2656f(d)(2).

**All in violation of Title 18, United States Code, Section 2339B(a)(1).**

DATED: Buffalo, New York, August 12, 2015.

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A TRUE BILL:

s/FOREPERSON