

JHK:JPL/BWB
F.#2009R01793

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

ADIS MEDUNJANIN,
also known as "Mohammed,"

Defendant.

Cr. No. _____
(T. 18, U.S.C., §§
956(a)(1), 956(a)(2),
2339D(a), 2339D(b)(1),
2 and 3551 et seq.)

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy To Commit Murder in Foreign Country)

1. In or about and between August 2008 and October 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere within the jurisdiction of the United States, the defendant ADIS MEDUNJANIN, also known as "Mohammed," together with others, did knowingly and intentionally conspire to commit one or more acts outside the United States that would constitute the offenses of murder and maiming if committed in the special maritime and territorial jurisdiction of the United States, and one or more of the conspirators did commit an act within the jurisdiction of the United States to effect an object of the conspiracy.

2. In furtherance of the conspiracy and to effect its objectives, the defendant ADIS MEDUNJANIN knowingly committed and caused to be committed, among others, the following overt act:

OVERT ACTS

a. On or about August 28, 2008, the defendant ADIS MEDUNJANIN boarded a flight at Newark Liberty International Airport to fly from Newark, New Jersey to Doha, Qatar and Peshawar, Pakistan.

(Title 18, United States Code, Sections 956(a)(1), 956(a)(2) and 3551 et seq.)

COUNT TWO

(Receiving Military-Type Training from
a Foreign Terrorist Organization)

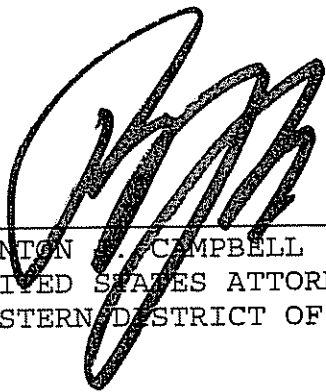
3. In or about and between August 2008 and October 2008, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant ADIS MEDUNJANIN, also known as "Mohammed," together with others, did knowingly and intentionally receive military-type training, as defined in 18 U.S.C. § 2339D(c)(1), from and on behalf of a foreign terrorist organization, to wit: Al Qaeda, which has been designated by the Secretary of State as a foreign terrorist

organization since October 1999, pursuant to Section 219(a)(1) of the Immigration and Nationality Act.

(Title 18, United States Code, Sections 2339D(a), 2339D(b)(1) and 3551 et seq.)

A TRUE BILL


FOREPERSON


BENTON S. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK