



JHK:BWB
F.# 2009R01793

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

NAJIBULLAH ZAZI,

Defendant.

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I N D I C T M E N T

Cr. No. _____
(T. 18, U.S.C., §§
2332a(a)(2) and 3551
et seq.)

THE GRAND JURY CHARGES:

CONSPIRACY TO USE WEAPONS OF MASS DESTRUCTION

On or about and between August 1, 2008 and September 21, 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant NAJIBULLAH ZAZI, together with others, did knowingly, intentionally and without lawful authority conspire to use one or more weapons of mass destruction, to wit: explosive bombs and ~~other similar explosive devices, against persons and property~~ within the United States, and in furtherance of the offense: (1) facilities of interstate commerce, to wit: email and the internet, were used, (2) one or more perpetrators, to wit: the defendant NAJIBULLAH ZAZI and others, traveled in interstate and

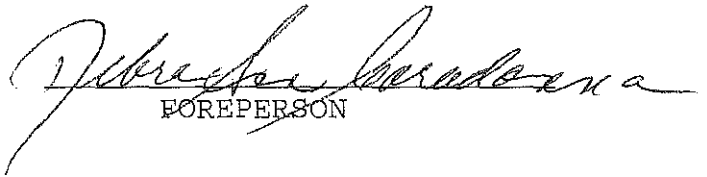
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ROBERT C. HEINEMANN
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foreign commerce, and (3) the offense and the results of the offense would have affected interstate and foreign commerce.

(Title 18, United States Code, Sections 2332a(a)(2) and 3551 et seq.)

A TRUE BILL


FOREPERSON


BENJON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK