

COUNT TWO

The SPECIAL AUGUST 2009-2 GRAND JURY further charges:

Beginning no later than on or about March 17, 2010, and continuing until at least March 23, 2010, at Chicago, in the Northern District of Illinois, and elsewhere,

RAJA LAHRASIB KHAN,

defendant herein, a national of the United States, did knowingly attempt to provide material support and resources, namely, property (funds) and currency, as those terms are defined in Title 18, United States Code, Section 2339A(b) and 2339B(g), to a foreign terrorist organization, namely, *al Qaeda*, which was designated by the United States Secretary of State as a foreign terrorist organization on October 8, 1999, and redesignated on October 5, 2001, October 2, 2003, and January 22, 2009, knowing that *al Qaeda* had engaged and was engaging in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that *al Qaeda* had engaged and was engaging in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989);

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY