

FILED IN OPEN COURT
ON 2-21-12 AB
Dennis P. Javarone, Clerk
US District Court
Eastern District of NC

TS

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:12-CR-20-1 (1)
7:12-CR-20-2 (1)
7:12-CR-20-3 (1)

UNITED STATES OF AMERICA)
)
v.) INDICTMENT
)
HYSEN SHERIFI)
SHKUMBIN SHERIFI)
NEVINE ALY ELSHIEKH)

The Grand Jury charges that:

COUNT ONE

Beginning no later than in or about December 2011, and continuing up to and including on or about January 22, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, did knowingly conspire, confederate, agree and have a tacit understanding with each other and others known and unknown to the Grand Jury to travel in, and cause another to travel in, interstate commerce, and use and cause another to use the mail and facilities of interstate commerce, with the intent that a murder be committed in violation of the laws of North Carolina as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value, specifically, United States currency, in violation of Title 18, United States Code, Section 1958(a).

COUNT TWO

On or about January 2, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, aiding and abetting each other, did knowingly use and cause another to use a facility of interstate commerce, specifically, a motor vehicle, with the intent that a murder be committed in violation of the laws of North Carolina as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value, specifically, United States currency, in violation of Title 18, United States Code, Section 1958(a) and Section 2.

COUNT THREE

On or about January 2, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, aiding and abetting each other, did knowingly use and cause another to use a facility of interstate commerce, specifically, a telephone, with the intent that a murder be committed in violation of the laws of North Carolina as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value, specifically, United States currency, in violation of Title 18, United States Code, Section 1958(a) and Section 2.

COUNT FOUR

On or about January 8, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, aiding and abetting each other, did knowingly use and cause another to use a facility of interstate commerce, specifically, a motor vehicle, with the intent that a murder be committed in violation of the laws of North Carolina as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value, to wit: United States Currency, in violation of Title 18, United States Code, Section 1958(a) and Section 2.

COUNT FIVE

On or about January 8, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, aiding and abetting each other, did knowingly use and cause another to use a facility of interstate commerce, specifically, a telephone, with the intent that a murder be committed in violation of the laws of North Carolina as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value, specifically, United States currency, in violation of Title 18, United States Code, Section 1958(a) and Section 2.

COUNT SIX

Beginning no later than in or around December 2011, and continuing up to and including on or about January 22, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, did knowingly conspire, confederate, agree and have a tacit understanding with each other and others known and unknown to the Grand Jury, to kill other persons, with intent to retaliate against any person for testimony given by a witness in an official proceeding, that is, the providing of testimony on behalf of the United States in the trial of United States v. Sherifi, et al., 5:09-CR-216-FL, in or about September through October 2011 in the Eastern District of North Carolina, in violation of Title 18, United States Code, Sections 1513(a)(1)(A), all in violation of Title 18, United States Code, Section 1513(f).

COUNT SEVEN

Beginning no later than in or around December 2011, and continuing up to and including on or about January 22, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, aiding and abetting each other, did knowingly attempt to kill other persons, with intent to retaliate against any person for testimony given by a witness in an official proceeding, that is, the providing of

testimony on behalf of the United States in the trial of United States v. Sherifi, et al., 5:09-CR-216-FL, in or about September through October 2011 in the Eastern District of North Carolina, in violation of Title 18, United States Code, Section 1513(a)(1)(A) and Section 2.

COUNT EIGHT

Beginning no later than in or around December 2011, and continuing up to and including on or about January 22, 2012, in the Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, did knowingly conspire, confederate, agree and have a tacit understanding with each other and others known and unknown to the Grand Jury, to kill other persons, with the intent to prevent the attendance and testimony of any person in official proceedings, including the trial of United States v. Subasic, 5:09-CR-216-3FL, scheduled for trial in 2012 in the Eastern District of North Carolina, in violation of Title 18, United States Code, Section 1512(a)(1)(A), all in violation of Title 18, United States Code, Section 1512(k).

COUNT NINE

Beginning no later than in or around December 2011, and continuing up to and including on or about January 22, 2012, in the


Eastern District of North Carolina and elsewhere, the defendants, HYSEN SHERIFI, SHKUMBIN SHERIFI and NEVINE ALY ELSHIEKH, aiding and abetting each other, did knowingly attempt to kill other persons, with the intent to prevent the attendance and testimony of any person in official proceedings, including the trial of United States v. Subasic, 5:09-CR-216-3FL, scheduled for trial in 2012 in the Eastern District of North Carolina, in violation of Title 18, United States Code, Section 1512(a)(1)(A) and Section 2.

A TRUE BILL

~~FOREPERSON~~

Date: 2/21/12

THOMAS G. WALKER
United States Attorney


~~TIMOTHY SEVERO~~
Special Assistant United States Attorney

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.