



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 1:13 cr 418  
 )  
YOUSEF AL-KHATTAB )

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Between on or about January 8, 2009, and the present date, in the Eastern District of Virginia and the State of New Jersey and elsewhere, defendant YOUSEF AL-KHATTAB did unlawfully, knowingly, and with the intent to place persons affiliated with Jewish organizations in other States, including the organization known as Chabad in Brooklyn, New York, in reasonable fear of death or serious bodily injury, use an interactive computer service and facility of interstate and foreign commerce, namely, the internet, to engage in a course of conduct that placed such persons in reasonable fear of death and serious bodily injury. In particular, AL-KHATTAB posted on the Revolution Muslim website videos, photos, slides and messages which included the address for the organization known as Chabad in Brooklyn, New York, designed to make such persons fear that lethal violence would be directed against them, in violation of Title 18, United States Code, Sections 2261A(2)(B).

Dana J. Boente  
Acting United States Attorney

By:   
Gordon D. Kromberg  
Assistant United States Attorney

John T. Gibbs  
Allison Ickovic  
Department of Justice Trial Attorneys