

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v.- : INDICTMENT

TARIK IBN OSMAN SHAH, : S4 05 Cr. 673 (LAP)

a/k/a "Tarik Shah," :

a/k/a "Tarik Jenkins," :

a/k/a "Abu Musab," :

RAFIQ SABIR, :

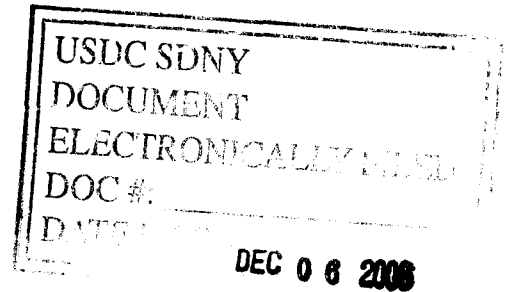
a/k/a "the Doctor," and :

MAHMUD FARUQ BRENT, :

a/k/a "Mahmud Al Mutazzim," :

Defendants. :

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COUNT ONE

The Grand Jury charges:

1. From at least in or about October 2003, up to and including in or about May 2005, in the Southern District of New York and elsewhere, TARIK IBN OSMAN SHAH, a/k/a "Tarik Shah," a/k/a "Tarik Jenkins," a/k/a "Abu Musab," and RAFIQ SABIR, a/k/a "the Doctor," the defendants, and others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other, to provide material support or resources, namely, personnel, training, and expert advice and assistance, as those terms are defined in Title 18, United States Code, Sections 2339A and 2339B, to a foreign terrorist organization, namely, al Qaeda, which was designated by the Secretary of State as a foreign terrorist organization on October

8, 1999, pursuant to Section 219 of the Immigration and Nationality Act, and was redesignated as such on or about October 5, 2001, and October 2, 2003, to wit, the defendants knowingly agreed to provide (i) one or more individuals (including themselves) to work under al Qaeda's direction and control and to organize, manage, supervise, and otherwise direct the operation of al Qaeda, (ii) instruction and teaching designed to impart a special skill to further the illegal objectives of al Qaeda, and (iii) advice and assistance derived from scientific, technical, and other specialized knowledge to further the illegal objectives of al Qaeda, to wit, TARIK IBN OSMAN SHAH, a/k/a "Tarik Shah," a/k/a "Tarik Jenkins," a/k/a "Abu Musab," agreed to provide martial arts training and instruction for jihadists, and RAFIQ SABIR, a/k/a "the Doctor," agreed to provide medical support to wounded jihadists, knowing that al Qaeda has engaged and engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), and that al Qaeda has engaged and engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Section 2339B.)

COUNT TWO

The Grand Jury further charges:

2. From at least in or about October 2003, up to and including in or about May 2005, in the Southern District of New York and elsewhere, TARIK IBN OSMAN SHAH, a/k/a "Tarik Shah," a/k/a "Tarik Jenkins," a/k/a "Abu Musab," and RAFIQ SABIR, a/k/a "the Doctor," the defendants, unlawfully and knowingly provided, and attempted to provide, material support or resources, namely personnel, training, and expert advice and assistance, as those terms are defined in Title 18, United States Code, Sections 2339A and 2339B, to a foreign terrorist organization, namely, al Qaeda, which was designated by the Secretary of State as a foreign terrorist organization on October 8, 1999, pursuant to Section 219 of the Immigration and Nationality Act, and was redesignated as such on or about October 5, 2001, and October 2, 2003, to wit, the defendants knowingly provided, and attempted to provide, (i) one or more individuals (including themselves) to work under al Qaeda's direction and control and to organize, manage, supervise, and otherwise direct the operation of al Qaeda, (ii) instruction and teaching designed to impart a special skill to further the illegal objectives of al Qaeda, and (iii) advice and assistance derived from scientific, technical, and other specialized knowledge to further the illegal objectives of al Qaeda, to wit, TARIK IBN OSMAN SHAH, a/k/a "Tarik Shah," a/k/a "Tarik Jenkins,"

a/k/a "Abu Musab," provided and attempted to provide martial arts training and instruction for jihadists, and RAFIQ SABIR, a/k/a "the Doctor," provided and attempted to provide medical support to wounded jihadists, knowing that al Qaeda has engaged and engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), and that al Qaeda has engaged and engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B and 2.)

COUNT THREE

The Grand Jury further charges:

3. From at least in or about 2001, up to and including in or about May 2005, in the Southern District of New York and elsewhere, MAHMUD FARUQ BRENT, a/k/a "Mahmud Al Mutazzim," the defendant, and others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other, to provide material support or resources, namely personnel, as that term is defined in Title 18, United States Code, Sections 2339A and 2339B, to a foreign terrorist organization, namely, Lashkar-e-Taiba, which was designated by the Secretary of State as a foreign terrorist organization on December 24, 2001, pursuant to Section 219 of the

Immigration and Nationality Act, and was redesignated as such on or about December 23, 2003, to wit, the defendant knowingly agreed to provide one or more individuals (including himself) to work under Lashkar-e-Taiba's direction and control and to organize, manage, supervise, and otherwise direct the operation of Lashkar-e-Taiba, to wit, MAHMUD FARUQ BRENT, a/k/a "Mahmud Al Mutazzim," with the assistance of others traveled to and attended a Lashkar-e-Taiba terrorist training camp in Pakistan, knowing that Lashkar-e-Taiba has engaged and engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act) and that Lashkar-e-Taiba has engaged and engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Section 2339B.)

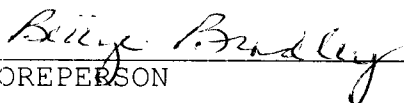
COUNT FOUR

The Grand Jury further charges:

4. From at least in or about 2001, up to and including in or about May 2005, in the Southern District of New York and elsewhere, MAHMUD FARUQ BRENT, a/k/a "Mahmud Al Mutazzim," the defendant, and others known and unknown, unlawfully and knowingly provided, and attempted to provide, material support or resources, namely personnel, as that term is defined in Title 18, United States Code, Sections 2339A and

2339B, to a foreign terrorist organization, namely, Lashkar-e-Taiba, which was designated by the Secretary of State as a foreign terrorist organization on December 24, 2001, pursuant to Section 219 of the Immigration and Nationality Act, and was redesignated as such on or about December 23, 2003, to wit, the defendant knowingly provided, and attempted to provide, one or more individuals (including himself) to work under Lashkar-e-Taiba's direction and control and to organize, manage, supervise, and otherwise direct the operation of Lashkar-e-Taiba, to wit, MAHMUD FARUQ BRENT, a/k/a "Mahmud Al Mutazzim," traveled to and attended a Lashkar-e-Taiba terrorist training camp in Pakistan, knowing that Lashkar-e-Taiba has engaged and engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act) and that Lashkar-e-Taiba has engaged and engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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UNITED STATES OF AMERICA

- v -

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a/k/a "Tarik Shah,"
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**RAFIQ SABIR,
a/k/a "the Doctor," and**

**MAHMUD FARUQ BRENT,
a/k/a "Mahmud Al Mutazzim,"**

Defendants.

INDICTMENT

S4 05 Cr. 673 (LAP)

18 U.S.C. § 2339B

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12/6/06

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Mr. Tabe P. H.