

COUNT FOUR

(Unlawfully Distributing Explosives Information)

On or about August 8, 2017, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

KAAN SERCAN DAMLARKAYA,

did knowingly and unlawfully distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and a weapon of mass destruction, with the intent that the information be used for, and in furtherance of, an activity that constitutes a federal crime of violence, including: violations of 18 U.S.C. § 956 (conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country); 18 U.S.C. § 2332a (conspiracy and attempt to use a weapon of mass destruction); 18 U.S.C. § 2332b (conspiracy and attempt to engage in acts of terrorism transcending national boundaries); 18 U.S.C. § 2339A (conspiracy, providing and attempting to provide material support to terrorists); and 18 U.S.C. § 2339B (conspiracy, providing and attempting to provide material support to a designated foreign terrorist organization).

All in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 2.

COUNT FIVE

(Unlawfully Distributing Explosives Information)

On or about August 10, 2017, within the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

KAAN SERCAN DAMLARKAYA,

did knowingly and unlawfully distribute by any means information pertaining to, in whole and in

part, the manufacture and use of an explosive, destructive device, and a weapon of mass destruction with the intent that the information be used for, and in furtherance of, an activity that constitutes a federal crime of violence, including: violations of 18 U.S.C. § 956 (conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country); 18 U.S.C. § 2332a (conspiracy and attempt to use a weapon of mass destruction); 18 U.S.C. § 2332b (conspiracy and attempt to engage in acts of terrorism transcending national boundaries); 18 U.S.C. § 2339A (conspiracy and attempt to provide material support to terrorists); and 18 U.S.C. § 2339B (conspiracy and attempt to provide material support to a designated foreign terrorist organization).

All in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 2.

A TRUE BILL

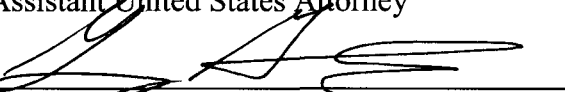
ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

ABE MARTINEZ
Acting United States Attorney
Southern District of Texas

By: 
ARTHUR R. JONES
Assistant United States Attorney

By: 
ALAMDAR S. HAMDANI
Assistant United States Attorney

By: 
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