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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS

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UNITED STATES OF AMERICA

No. 4:19CR-00418-SWW U.S. DISTRICT COURT EASTERN DISTRICT ARKANSAS

18 U.S.C. § 2339B(a)(1)

18 U.S.C. § 1542

AUG 08 2019

CORMACK, CLERK

DEP CLERK

v.

BILAL AL-RAYANNI, a/k/a Bilal Kassim Alawdi

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

From on or about October 1, 2014, to on or about December 31, 2014, within the extraterritorial jurisdiction of the United States and the Eastern District of Arkansas, the defendant,

BILAL AL-RAYANNI, a/k/a Bilal Kassim Alawdi,

being found in the Eastern District of Arkansas after the conduct required for the offense occurred, knowingly provided and attempted to provide material support and resources, namely, personnel (including himself) and services, to a foreign terrorist organization, namely, Al Qa'ida in the Arabian Peninsula (AQAP), also known as Ansar al-Shari'a (AAS), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act ("INA"), knowing that AQAP was a designated foreign terrorist organization and that AQAP has engaged and engages in terrorist activity and terrorism, in violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

COUNT 2

On or about May 13, 2019, in the Eastern District of Arkansas, the defendant, BILAL AL-RAYANNI, a/k/a Bilal Kassim Alawdi,

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willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated that his name was Bilal Kassim Alawdi, which statement he knew to be false, in violation of Title 18, United States Code, Section 1542.

[END OF TEXT. SIGNATURE PAGE ATTACHED.]