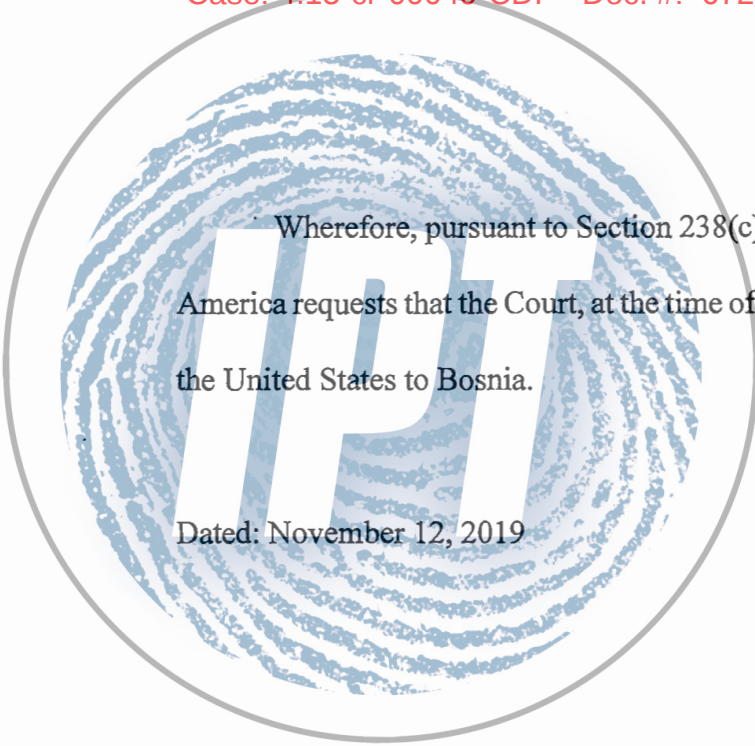




charged in the Indictment: Count One, conspiring to provide material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A; and Count Three, providing material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A.

5. The maximum term of imprisonment for a conviction of Count One – conspiracy to provide material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A – is 15 years. The maximum term of imprisonment for a conviction of Count Three – providing material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A – is 15 years.

6. The defendant is, and at sentencing will be, subject to removal from the United States pursuant to Section 237(a)(4)(B) of the INA, as amended, 8 U.S.C. § 1227(a)(4)(B), as an alien described in Section 212(a)(3)(B)(i)(I) of the INA, 8 U.S.C. § 1182(a)(3)(B)(i)(I), for having engaged in terrorist activity, specifically as defined in 1) Section 212(a)(3)(B)(iv)(IV)(aa) of the INA, 8 U.S.C. § 1182(a)(3)(B)(iv)(IV)(aa), by soliciting funds or other things of value for a terrorist activity; 2) Section 212(a)(3)(B)(iv)(VI)(aa) of the INA, 8 U.S.C. § 1182(a)(3)(B)(iv)(VI)(aa), by committing an act that he knew, or reasonably should have known, afforded material support for the commission of a terrorist activity; and 3) Section 212(a)(3)(B)(iv)(VI)(aa) of the INA, 8 U.S.C. § 1182(a)(3)(B)(iv)(VI)(aa), by committing an act that he knew, or reasonably should have known, afforded material support to an individual he knew, or reasonably should have known, has committed or plans to commit a terrorist activity.



Wherefore, pursuant to Section 238(c) of the INA, 8 U.S.C. § 1228(c), the United States of America requests that the Court, at the time of sentencing, order that the defendant be removed from the United States to Bosnia.

Dated: November 12, 2019

JEFFREY B. JENSEN  
United States Attorney  
EASTERN DISTRICT OF MISSOURI

*/s Matthew T. Drake*  
Matthew T. Drake – 46499MO  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, Missouri 63102  
(314) 539-2200