



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

02-60096

CASE NO. _____

18 U.S.C. §844(n)
18 U.S.C. §373
18 U.S.C. §2

CR - DIMITROULEAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

IMRAN MANDHAI and
SHUEYB MOSSA JOKHAN,

Defendants.

**MAGISTRATE JUDGE
SNOW**

FILED BY: *[Signature]*
2002 MAY 16 PM 3:02
D.C.
CLERK U.S. DIST. CT.
S.D. OF FL.-FTL.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

1. From in or around May, 2000, to in or around May, 2001, in Broward and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

IMRAN MANDHAI and
SHUEYB MOSSA JOKHAN,

together with others known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate and agree to knowingly and maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, any building, vehicle, and other real and personal property used in interstate and foreign commerce, and in any activity affecting interstate and foreign commerce, as defined in Title 18, United States Code, Section 841(b), in violation of Title

[Handwritten signature]



18, United States Code, Section 844(i).

MANNER AND MEANS OF THE CONSPIRACY

2. Among the manner and means by which the defendants and unindicted co-conspirators, who are both known and unknown, carried out the objects of the conspiracy, were the following:

a. **Imran Mandhai** sought funding to acquire a variety of items to engage in training for an armed struggle against the United States, otherwise known as a “jihad,” including firearms and other weapons, night vision equipment, stun guns, pepper spray and smoke grenades, and other military supplies;

b. **Imran Mandhai** solicited and recruited individuals to join him in training for “jihad” activities;

c. the defendants attempted to purchase an AK-47 type assault rifle at a gun show for training in preparation for “jihad” operations; and

d. the defendants scouted several locations as targets for a “jihad” mission, including electrical power substations and a National Guard Armory, in preparation for bombing such a location or locations, which would be followed by a list of demands to be placed on the United States government and other governments elsewhere around the world.

OVERT ACTS

3. In furtherance of the conspiracy and in order to accomplish the objects of the conspiracy, at least one of the following overt acts, among others, were committed by a conspirator in the Southern District of Florida and elsewhere:

a. In between approximately May, 2000 and November, 2000, **Imran Mandhai** went with an individual he believed to be a member of a mujahedin group in Turkey to gun ranges and



gun shows. On one such occasion, this individual showed **Mandhai** a collection of books on car bombs and homemade explosives at his home;

b. On some date prior to March 16, 2001, **Imran Mandhai** participated in the preparation of handouts on training for “jihad,” as well as a weapons and equipment list;

c. On or about March 13, 2001, **Imran Mandhai** and others scouted two electrical power substations in Broward County, Florida;

d. On or about March 17, 2001, **Imran Mandhai** possessed and transferred a copy of “The Anarchist Cookbook”;

e. On or about March 23, 2001, **Imran Mandhai** solicited assistance in getting an individual out of federal custody whom he described as a mujahedin fighter who wants to make “jihad”;

f. On or about March 27, 2001, **Imran Mandhai** went to two gun stores in Hollywood, Florida;

g. On or about April 4, 2001, **Imran Mandhai** and **Shueyb Mossa Jokhan** went to two gun shops in Hollywood, Florida, and in one, inquired about AK-47 type assault rifles;

h. On or about April 21, 2001, **Imran Mandhai** and **Shueyb Mossa Jokhan** went to a gun show and attempted to purchase an AK-47 type assault rifle;

i. On or about April 24, 2001, **Imran Mandhai** and **Shueyb Mossa Jokhan** scouted an electrical transformer located near Miami International Airport, and an electrical power substation in Miami Shores, Florida; and

j. On or about April 25, 2001, **Imran Mandhai** and **Shueyb Mossa Jokhan** scouted



a National Guard Armory in Hollywood, Florida and discussed the merits of bombing that facility.

All in violation of Title 18, United States Code, Section 844(n).

COUNT TWO

4. From on or about April 4, 2001, and continuing thereafter to on or about May 5, 2001, in Broward and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendant,

IMRAN MANDHAI,

with the intent that SHUEYB MOSSA JOKHAN engage in conduct constituting a felony that has as an element the use, attempted use and threatened use of physical force against the property of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did knowingly and willfully solicit, command, induce and otherwise endeavor to persuade SHUEYB MOSSA JOKHAN to engage in such conduct, that is, to knowingly and willfully damage and attempt to damage the property of an energy facility, and cause and attempt to cause a significant interruption and impairment of a function of an energy facility, in violation of Title 18, United States Code, Section 1366.



All in violation of Title 18, United States Code, Sections 373 and 2.

A TRUE BILL

John M. Mizubee
FOREPERSON

Guy A. Lewis

GUY A. LEWIS
UNITED STATES ATTORNEY

Jeffrey H. SLOMAN

JEFFREY H. SLOMAN
ASSISTANT UNITED STATES ATTORNEY

John Schlesinger

JOHN SCHLESINGER
ASSISTANT UNITED STATES ATTORNEY

Julia A. Paylor

JULIA A. PAYLOR
ASSISTANT UNITED STATES ATTORNEY



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Imran Mandhai **Case No:** _____

Count #: I

Conspiracy to destroy property affecting interstate commerce; in violation of Title 18 USC Sections 844(i) & (n).

*** Max. Penalty:** Five years to 20 years' imprisonment; \$250,000 fine

Count #: II

Solicitation to commit a crime of violence; in violation of Title 18 U.S.C. Section 373

***Max. Penalty:** Five years' imprisonment; \$125,000 fine

Count #:

***Max. Penalty:** _____

Count #:

***Max. Penalty:** _____

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Shueyb Mossa Jokhan Case No: _____

Count #: I

Conspiracy to destroy property affecting interstate commerce; in violation of Title 18 USC
Section 844(i) & (n).

*** Max. Penalty:** Five years to 20 years' imprisonment; \$250,000 fine

Count #:

***Max. Penalty:** _____

Count #:

***Max. Penalty:** _____

Count #:

***Max. Penalty:** _____

***Refers only to possible term of incarceration, does not include possible fines, restitution,
special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



UNITED STATES OF AMERICA

CASE NO. _____

v.
**IMRAN MANDHAI and
SHUEYB MOSSA JOKHAN**

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) _____ Yes _____ No
Number of New Defendants _____
Total number of counts _____

_____ Miami _____ Key West
 FTL _____ WPB _____ FTP

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) _____ No _____
List language and/or dialect _____ English _____

4. This case will take 6 days for the parties to try.

5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I	0 to 5 days	_____	Petty	_____
II	6 to 10 days	<u>X</u>	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<u>X</u>
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) NO
If yes:
Judge: _____ Case No. _____
(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) NO
If yes:
Magistrate Case No. _____
Related Miscellaneous numbers: _____
Defendant(s) in federal custody as of Mandhai in INS custody since 2/13/02
Defendant(s) in state custody as of _____
Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) _____

7. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999?
Yes X No If yes, was it pending in the Central Region? ___ Yes ___ No

8. Did this case originate in the Narcotics Section, Miami? ___ Yes X No

JEFFREY H. SLOMAN
ASSISTANT UNITED STATES ATTORNEY
BAR NO. 378879



No. 05027

UNITED STATES DISTRICT COURT

Southern District of Florida
Central Criminal Division

THE UNITED STATES OF AMERICA

vs.

Imran Mandhari
and
Shueyb Mossa Jokhan

INDICTMENT

18 USC § 844(n) & 373

A true bill.

Foreperson

Filed in open court this

day,

of

A.D. 20

Clerk

Bail, \$
