

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

GRAND JURY B-17-1

UNITED STATES OF AMERICA

v.

FAREED AHMED KHAN

CRIMINAL NO. 318CR195 JAM

VIOLATION:

18 U.S.C. § 1001(a)
(Making a False Statement in the course of a
Terrorism Investigation)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Making a False Statement in a Terrorism Investigation)

On or about June 26, 2015, in the District of Connecticut, in a matter involving international terrorism as defined in Title 18, United States Code, Section 2331, within the jurisdiction of the executive branch of the Government of the United States, that is, the Federal Bureau of Investigation (FBI), the defendant, FAREED AHMED KHAN, did knowingly and willfully make materially false, fraudulent, and fictitious statements and representations, to wit:

- (1) He was not affiliated with the Islamic Circle of North America ("ICNA"), ICNA Relief, Helping Hands, or the Helping Hand for Relief and Development;
- (2) He had no personal association with ICNA;
- (3) He did not know anyone from ICNA;
- (4) He had no idea how charities such as ICNA work and was not aware if they collected cash, checks or other material goods for individuals in need;
- (5) He had never collected any type of charitable donations for ICNA or any other charitable organization; and

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(6) The only packages he has ever sent to Pakistan were to his sister and brother and contained clothing.

All in violation of Title 18, United States Code, Section 1001(a)(2).

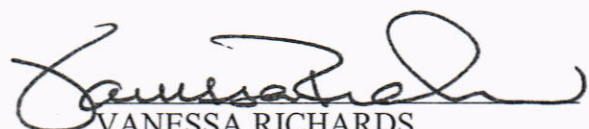
A TRUE BILL



FOREPERSON



JOHN H. DURHAM
UNITED STATES ATTORNEY



VANESSA RICHARDS
ASSISTANT U.S. ATTORNEY