

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 1:12-cr-00033-JLK

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. JAMSHID MUHTOROV,

2. BAKHTIYOR JUMAEV,

Defendants.

THIRD SUPERSEDING INDICTMENT

18 U.S.C. § 2339B - Material Support of a Designated Foreign Terrorist Organization
and Attempt and Conspiracy to do the Same

18 U.S.C. § 2339A – Conspiracy to Provide Material Support to Terrorism

COUNT 1

The Grand Jury charges that:

Between and on or about January 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendants, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”; and Bakhtiyor Jumaev, a/k/a “Abu Bakr”, together with others both known and unknown to the Grand Jury; did knowingly conspire, combine, confederate, cooperate and agree with each other to provide and attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section

2339A(b), to wit: property [at least \$300 in currency], to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States; and, further there was interdependency among the members of the conspiracy.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 2

The Grand Jury further charges that:

Between and on or about January 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendants, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”; and Bakhtiyor Jumaev, a/k/a “Abu Bakr”, together with others both known and unknown to the Grand Jury; did knowingly provide and attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: property [at least \$300 in currency], to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 3

The Grand Jury further charges that:

Between and on or about March 8, 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendant, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”, together with others both known and unknown to the Grand Jury; did knowingly provide and attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: knowingly providing one or more personnel, Jamshid Muhtorov, to the Islamic Jihad Union (“IJU”) to work under the IJU’s direction and control, to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 4

The Grand Jury further charges that:

Between and on or about January 30, 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendant, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”, together with others both known and

unknown to the Grand Jury; did knowingly provide and attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: communications equipment and services, to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 5

The Grand Jury further charges that:

Between and on or about January 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendants, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”; and Bakhtiyor Jumaev, a/k/a “Abu Bakr”, together with others both known and unknown to the Grand Jury; did knowingly conspire, combine, confederate, cooperate and agree with each other to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: knowingly providing personnel, to include Abdullo Jumaev, knowing or intending that they were to be used in preparation for, or in carrying out, a violation of Title 18, United States Code, Section 956, and the offense occurred in whole or in part within the United States; and, further there was interdependency among the members of the conspiracy.

All in violation of Title 18, United States Code, Section 2339A.

COUNT 6

The Grand Jury charges that:

Between and on or about January 2011 through January 21, 2012, inclusive, in the State and District of Colorado and elsewhere, the defendants, Jamshid Muhtorov, a/k/a “Abumumin Turkistony”, a/k/a “Abu Mumin”, a/k/a “Horun Asrorov”; and Bakhtiyor Jumaev, a/k/a “Abu Bakr”, together with others both known and unknown to the Grand Jury; did knowingly conspire, combine, confederate, cooperate and agree with each other to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit: knowingly providing personnel, Abdullo Jumaev, to a foreign terrorist organization, specifically the Islamic Jihad Union (“IJU”), continuously designated since June 12, 2005 and as amended on April 29, 2008, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the offense occurred in whole or in part within the United States; and, further there was interdependency among the members of the conspiracy.

All in violation of Title 18, United States Code, Section 2339B.

TRUE BILL

Ink signature on file in the clerk's office
FOREPERSON

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