

SDD/SK/PWB
F# 2011R00783

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

★ JUN 26 2015 ★
BROOKLYN OFFICE

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UNITED STATES OF AMERICA

SUPERSEDING
INFORMATION

- against -

Cr. No. 11-623 (S-2) (JG)

AGRON HASBAJRAMI,

(T. 18, U.S.C., §§ 371, 2339A(a),
2 and 3551 et seq.)

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Provision and Attempted Provision of Material Support to Terrorists)

1. On or about and between April 1, 2011 and September 6, 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant AGRON HASBAJRAMI, together with others, did knowingly and intentionally provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments and personnel, including himself, knowing and intending that they were to be used in preparation for, and in carrying out, a conspiracy to commit at a place outside of the United States an act that would constitute the offense of murder, kidnapping or maiming if committed in the special maritime and territorial jurisdiction of the United States, where one of the conspirators committed an act within the jurisdiction of the United States to effect an object of the conspiracy, in violation of Title 18, United States Code, Section 956(a).

(Title 18, United States Code, Sections 2339A(a), 2 and 3551 et seq.)

COUNT TWO

(Conspiracy to Provide Material Support to Terrorists)

2. On or about and between April 1, 2011 and September 6, 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant AGRON HASBAJRAMI, together with others, did knowingly and willfully conspire to commit an offense against the United States, to wit: to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments and personnel, including himself, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 956(a), in violation of Title 18, United States Code, Section 2339A(a).

3. It was part of the conspiracy that the defendant AGRON HASBAJRAMI, together with others, obtained specific information from one or more individuals overseas for the purpose of facilitating the defendant's travel from the United States to join a militant jihadist group that was engaged in fighting in Afghanistan and Pakistan.

4. It was further part of the conspiracy that the defendant AGRON HASBAJRAMI set aside funds for the purpose of arming himself with a weapon upon his arrival in Pakistan.

5. It was further part of the conspiracy that the defendant AGRON HASBAJRAMI obtained personal equipment to use in support of a militant jihadist group that was engaged in fighting in Afghanistan and Pakistan.

6. In furtherance of the conspiracy and to effect its unlawful objects, the defendant AGRON HASBAJRAMI, together with others, committed, within the Eastern District of New York and elsewhere, the following overt acts:

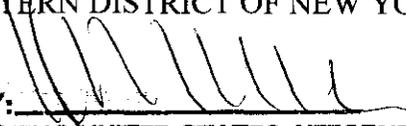
Overt Acts

a. On or about April 9, 2011, a coconspirator sent the defendant AGRON HASBAJRAMI an email providing specific guidance as to how the defendant could meet with members of the Tehrik i Taliban Pakistan, a designated foreign terrorist organization, in order to facilitate the defendant's travel into the Federally Administered Tribal Area of Pakistan.

b. On or about September 6, 2011, the defendant AGRON HASBAJRAMI traveled from his home in Brooklyn, New York to John F. Kennedy International Airport in Queens, New York, intending to board a flight to Istanbul, Turkey for the purpose of traveling overseas to join a militant jihadist group that was engaged in combat operations against U.S. forces and others in Afghanistan and Pakistan.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

KELLY T. CURRIE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136