

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 12-60298-CR-BLOOM/O’SULLIVAN(s)

**18 U.S.C. § 2332a(a)
18 U.S.C. § 2339A(a)
18 U.S.C. § 2339B(a)(1)
18 U.S.C. § 371
18 U.S.C. § 111(a)(1)
18 U.S.C. § 1114(3)
18 U.S.C. § 2**

UNITED STATES OF AMERICA

v.

**RAEES ALAM QAZI,
a/k/a “Shan,” and
SHEHERYAR ALAM QAZI,**

Defendants.

_____ /

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

**Conspiring to Use a Weapon of Mass Destruction
(18 U.S.C. § 2332a(a))**

Beginning on a date unknown to the Grand Jury, but no later than July 2011, and continuing through on or about November 29, 2012, in Broward County, in the Southern District of Florida and elsewhere, the defendants,

**RAEES ALAM QAZI,
a/k/a “Shan,” and
SHEHERYAR ALAM QAZI,**

did knowingly combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to use, without lawful authority, a weapon of mass destruction, that is, a destructive device, as defined in Title 18, United States Code, Section 921(a)(4), against

persons and property within the United States and with a facility of interstate commerce being used in furtherance of the offense, with a defendant traveling in and causing another to travel in interstate commerce in furtherance of the offense, and with the offense and the results of the offense, had those results occurred, affecting interstate commerce, in violation of Title 18, United States Code, Section 2332a(a).

COUNT 2

**Conspiring to Provide Material Support to Terrorists
(18 U.S.C. § 2339A(a))**

Beginning on a date unknown to the Grand Jury, but no later than July 2011, and continuing through on or about November 29, 2012, in Broward County, in the Southern District of Florida and elsewhere, the defendants,

**RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERYAR ALAM QAZI,**

did knowingly combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to property, service, including financial services, lodging, communications equipment, and personnel, knowing and intending that they be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 2332a(a), that is, using a weapon of mass destruction; all in violation of Title 18, United States Code, Section 2339A(a).

COUNT 3

**Providing and Attempting to Provide Material Support to Terrorists
(18 U.S.C. § 2339A(a))**

Beginning on a date unknown to the Grand Jury, but no later than July 2011, and continuing through on or about November 29, 2012, in Broward County, in the Southern District

of Florida and elsewhere, the defendants,

**RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERYAR ALAM QAZI,**

did knowingly provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to property, service, including financial services, lodging, communications equipment, and personnel, knowing and intending that they be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 2332a(a), that is, using a weapon of mass destruction; all in violation of Title 18, United States Code, Sections 2339A(a) and 2.

COUNT 4

**Conspiring to Provide Material Support to a
Foreign Terrorist Organization
(al-Qa'ida and al-Qa'ida in the Arabian Peninsula)
(18 U.S.C. § 2339B(a)(1))**

Beginning on a date unknown to the Grand Jury, but no later than July 2011, and continuing through on or about November 29, 2012, in Broward County, in the Southern District of Florida and elsewhere, the defendants,

**RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERYAR ALAM QAZI,**

did knowingly combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to property, service, including financial services, lodging, communications equipment, and personnel, to a Foreign Terrorist Organization, that is, al-Qa'ida and al-Qa'ida in the Arabian Peninsula, knowing

that those organizations have engaged and engage in terrorist activity, as defined in Title 8, United States Code, Section 1182(a)(3)(B); all in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 5

**Attempting to Provide Material Support to a
Foreign Terrorist Organization
(al-Qa'ida and al-Qa'ida in the Arabian Peninsula)
(18 U.S.C. § 2339B(a)(1))**

Beginning on a date unknown to the Grand Jury, but no later than July 2011, and continuing through on or about November 29, 2012, in Broward County, in the Southern District of Florida and elsewhere, the defendants,

**RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERYAR ALAM QAZI,**

did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to property, service, including financial services, lodging, communications equipment, and personnel, to a Foreign Terrorist Organization, that is, al-Qa'ida and al-Qa'ida in the Arabian Peninsula, knowing that those organizations have engaged and engage in terrorist activity, as defined in Title 8, United States Code, Section 1182(a)(3)(B); all in violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

COUNT 6

**Conspiring to Forcibly Assault a Federal Employee
(18 U.S.C. § 371)**

Beginning on a date unknown to the Grand Jury, and continuing through on or about April 8, 2014, in Miami-Dade County, in the Southern District of Florida, the defendants,

**RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERYAR ALAM QAZI,**

did knowingly and willfully combine, conspire, confederate, and agree with each other to commit an offense against the United States, that is, to forcibly assault, resist, oppose, impede, intimidate, and interfere with, and inflict bodily injury upon, Sebastien Barrois and Michael Norwood, officers and employees of the United States Marshals Service, an agency in a branch of the United States Government, while they were engaged in and on account of the performance of their official duties, in violation of Title 18, United States Code, Sections 111(a)(1) and 111(b).

PURPOSE AND OBJECT OF THE CONSPIRACY

It was the purpose and object of the conspiracy to simultaneously and forcibly assault Deputy United States Marshals and inflict bodily injury upon them.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants sought to accomplish the purpose and object of the conspiracy included, among other things, distracting Deputy United States Marshals and then simultaneously and forcibly assaulting and inflicting bodily injury upon them.

OVERT ACTS

1. On or about April 8, 2014, **RAEES ALAM QAZI** and **SHEHERYAR ALAM QAZI**, while being moved within the United States Courthouse complex, simultaneously motioned with their heads to cause the Deputy United States Marshals to look at the ceiling.

2. On or about April 8, 2014, **RAEES ALAM QAZI** and **SHEHERYAR ALAM QAZI**, while the Deputy United States Marshals were momentarily distracted, simultaneously punched them in the face and struggled with them.

3. On or about April 8, 2014, **RAEES ALAM QAZI** and **SHEHERYAR ALAM QAZI**, while struggling with the Deputy United States Marshals, attempted to use potentially lethal force on them.

4. On or about April 8, 2014, **RAEES ALAM QAZI** and **SHEHERYAR ALAM QAZI**, while struggling with the Deputy United States Marshals, simultaneously exclaimed “Allahu Akbar,” an Arabic exhortation meaning “God is Great.”

All in violation of Title 18, United States Code, Section 371.

COUNT 7

**Forcibly Assaulting a Federal Employee
(18 U.S.C. § 111(a)(1))**

On or about April 8, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**RAEES ALAM QAZI,
a/k/a “Shan,”**

did forcibly assault, resist, oppose, impede, intimidate, and interfere with, and inflict bodily injury upon, Sebastien Barrois, an officer and employee of the United States Marshals Service, an agency in a branch of the United States Government, while he was engaged in and on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 111(a)(1) and 111(b).

COUNT 8

**Forcibly Assaulting a Federal Employee
(18 U.S.C. § 111(a)(1))**

On or about April 8, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

SHEHERYAR ALAM QAZI,

did forcibly assault, resist, oppose, impede, intimidate, and interfere with, and inflict bodily injury upon, Michael Norwood, an officer and employee of the United States Marshals Service, an agency in a branch of the United States Government, while he was engaged in and on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 111(a)(1) and 111(b).

COUNT 9

**Attempting to Murder a Federal Employee
(18 U.S.C. § 1114(3))**

On or about April 8, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**RAEES ALAM QAZI,
a/k/a "Shan,"**

with malice aforethought, did attempt to kill Sebastien Barrois, an officer and employee of the United States Marshals Service, an agency in a branch of the United States Government, while he was engaged in and on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 1114(3) and 1113.

COUNT 10

**Attempting to Murder a Federal Employee
(18 U.S.C. § 1114(3))**

On or about April 8, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

SHEHERYAR ALAM QAZI,


with malice aforethought, did attempt to kill Michael Norwood, an officer and employee of the United States Marshals Service, an agency in a branch of the United States Government, while he was engaged in and on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 1114(3) and 1113.

A TRUE BILL

FOREPERSON



WIFREDO A. FERRER
UNITED STATES ATTORNEY



KAREN E. GILBERT
ASSISTANT UNITED STATES ATTORNEY



ADAM S. FELS
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. 12-60298-CR-BLOOM(s)

vs.

CERTIFICATE OF TRIAL ATTORNEY*

RAEES ALAM QAZI,
a/k/a "Shan," and
SHEHERAY ALAM QAZI,

Defendants.

Superseding Case Information:

Court Division: (Select One)

X Miami Key West
 FTL WPB FTP

New Defendant(s) Yes No X
Number of New Defendants
Total number of counts 10

I do hereby certify that:

- 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.
- 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.
- Interpreter: (Yes or No) Yes
List language and/or dialect Pashto
- This case will take 28 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)

I 0 to 5 days
 II 6 to 10 days
 III 11 to 20 days
 IV X 21 to 60 days
 V 61 days and over


(Check only one)

Petty
 Minor
 Misdem.
 Felony X

- 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) Yes
 If yes:
 Magistrate Case No. 12-60298-CR-BLOOM(s)
 Related Miscellaneous numbers: _____
 Defendant(s) in federal custody as of 11/29/2012
 Defendant(s) in state custody as of _____
 Rule 20 from the _____ District of _____

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

- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes X No
- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes X No



 ADAM S. FELS
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. A5501040

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RAEES ALAM QAZI, a/k/a "Shan"

Case No: 12-60298-CR-BLOOM(s)

Count #: 1

Conspiring to Use a Weapon of Mass Destruction

Title 18, United States Code, Section 2332a(a)

***Max. Penalty:** Life Imprisonment

Count #: 2

Conspiring to Provide Material Support to Terrorists

Title 18, United States Code, Section 2339A(a)

*** Max. Penalty:** 15 Years' Imprisonment

Count #: 3

Providing Material Support to Terrorists

Title 18, United States Code, Section 2339A(a)

***Max. Penalty:** 15 Years' Imprisonment

Count #: 4

Conspiring to Provide Material Support to a Foreign Terrorist Organization

Title 18, United States Code, Section 2339B(a)(1)

***Max. Penalty:** 15 Years' Imprisonment

***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: RAEES ALAM QAZI, a/k/a "Shan"

Case No: 12-60298-CR-BLOOM(s)

Count #: 5

Attempting to Provide Material Support to a Foreign Terrorist Organization

Title 18, United States Code, Section 2339B(a)(1)

***Max. Penalty:** 15 Years' Imprisonment

Count #: 6

Conspiring to Forcibly Assault a Federal Employee

Title 18, United States Code, Section 371

***Max. Penalty:** 5 Years' Imprisonment

Count #: 7

Forcibly Assaulting a Federal Employee

Title 18, United States Code, Section 111(a)(1)

***Max. Penalty:** 20 Years' Imprisonment

Count #: 9

Attempting to Murder a Federal Employee

Title 18, United States Code, Section 1114(3)

***Max. Penalty:** 20 Years' Imprisonment

***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: SHEHERYAR ALAM QAZI

Case No: 12-60298-CR-BLOOM(s)

Count #: 1

Conspiring to Use Weapon of Mass Destruction

Title 18, United States Code, Section 2332A(a)

***Max. Penalty:** Life Imprisonment

Count #: 2

Conspiring to Provide Material Support to Terrorists

Title 18, United States Code, Section 2339A(a)

*** Max. Penalty:** 15 Years' Imprisonment

Count #: 3

Providing Material Support to Terrorists

Title 18, United States Code, Section 2339A(a)

***Max. Penalty:** 15 Years' Imprisonment

Count #: 4

Conspiring to Provide Material Support to a Foreign Terrorist Organization

Title 18, United States Code, Section 2339B(a)(1)

***Max. Penalty:** 15 Years' Imprisonment

***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: SHEHERYAR ALAM QAZI

Case No: 12-60298-CR-BLOOM(s)

Count #: 5

Attempting to Provide Material Support to a Foreign Terrorist Organization

Title 18, United States Code, Section 2339B(a)(1)

*Max. Penalty: 15 Years' Imprisonment

Count #: 6

Conspiring to Forcibly Assault a Federal Employee

Title 18, United States Code, Section 371

*Max. Penalty: 5 Years' Imprisonment

Count #: 8

Forcibly Assaulting a Federal Employee

Title 18, United States Code, Section 111(a)(1)

*Max. Penalty: 20 Years' Imprisonment

Count #: 10

Attempting to Murder a Federal Employee

Title 18, United States Code, Section 1114(3)

*Max. Penalty: 20 Years' Imprisonment

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