# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

# Holding a Criminal Term Grand Jury Sworn in on November 12, 2010

UNITED STATES OF AMERICA : Criminal No.

•

: VIOLATIONS:

v.

: 18 U.S.C. § 1114

: (Attempt to Murder Officers or

**MEVLID JASAREVIC,** 

Defendant.

Employees of the United States)

18 U.S.C. § 1113

(Attempt to Murder Nationals of the

United States within the Special Maritime

and Territorial Jurisdiction of the United

States)

:

18 U.S.C. § 113(a)(3)

(Assault with a Dangerous Weapon, with

Intent to do Bodily Harm, within the

Special Maritime and Territorial

Jurisdiction of the United States)

:

:

: 18 U.S.C. § 111(a)(1) and (b)

: (Assaulting Officers or Employees of the

United States with a Deadly Weapon)

:

: 18 U.S.C. § 1363

: (Injury to Buildings or Property and

Placing Lives in Jeopardy within the

Special Maritime and Territorial

Jurisdiction of the United States)

jui isulction of the O

: 18 U.S.C. § 924(c)(1)(A)(iii) and (B)(ii)

(Use of a Firearm During a Crime

: of Violence)

# INDICTMENT

The Grand Jury charges that:

#### **COUNT ONE**

On or about October 28, 2011, outside the United States, in Sarajevo, Bosnia and Herzegovina, and pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendant, MEVLID JASAREVIC, with malice aforethought, unlawfully, willfully, deliberately, maliciously, and with premeditation, did attempt to murder officers and employees of the United States, while they were engaged in and on account of the performance of official duties at the United States Embassy.

(Attempt to Murder Officers or Employees of the United States, in violation of 18 U.S.C. § 1114)

### **COUNT TWO**

On or about October 28, 2011, within the special maritime and territorial jurisdiction of the United States, in Sarajevo, Bosnia and Herzegovina, and pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendant, MEVLID JASAREVIC, with malice aforethought, unlawfully, willfully, deliberately, maliciously, and with premeditation, did attempt to murder nationals of the United States at the United States Embassy.

(Attempt to Murder Nationals of the United States within the Special Maritime and Territorial Jurisdiction of the United States, in violation of 18 U.S.C. § 1113)

### **COUNT THREE**

On or about October 28, 2011, within the special maritime and territorial jurisdiction of the United States, in Sarajevo, Bosnia and Herzegovina, and pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendant, MEVLID JASAREVIC, knowingly did assault with a dangerous weapon, that is, a

firearm, with intent to do bodily harm, and without just cause or excuse, nationals of the United States.

(Assault with a Dangerous Weapon, with Intent to Do Bodily Harm within the Special Maritime and Territorial Jurisdiction of the United States, in violation of 18 U.S.C. § 113(a)(3))

## **COUNT FOUR**

On or about October 28, 2011, outside the United States, in Sarajevo, Bosnia and Herzegovina, and pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendant, MEVLID JASAREVIC, knowingly and by means and use of a dangerous weapon, that is a firearm, did forcibly assault, impede, intimidate, and interfere with officers and employees of the United States, while they were engaged in and on account of the performance of official duties at the United States Embassy.

(Assaulting Officers or Employees of the United States with a Deadly Weapon in violation of 18 U.S.C. § 111(a)(1) and (b))

#### **COUNT FIVE**

On or about October 28, 2011, within the special maritime and territorial jurisdiction of the United States, in Sarajevo, Bosnia and Herzegovina, and pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendant, MEVLID JASAREVIC, willfully and maliciously destroyed and injured property of the United States, that is, the United States Embassy, and placed the lives of United States nationals in jeopardy, by means of a firearm.

(Injury to Buildings or Property and Placing Lives in Jeopardy within the Special Maritime and Territorial Jurisdiction of the United States, in violation of 18 U.S.C. § 1363)

# **COUNTS SIX THROUGH TEN**

On or about October 28, 2011, outside the United States, in Sarajevo, Bosnia and Herzegovina, and pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendant, MEVLID JASAREVIC, did knowingly possess, use, carry, brandish, and discharge a firearm, that is, a machinegun, during and in relation to the following crimes of violence for which he may be prosecuted in a court of the United States:

COUNT	PREDICATE OFFENSE
SIX	Attempt to Murder Officers or Employees of the United States (Count One)
SEVEN	Attempt to Murder Nationals of the United States within the Special Maritime and Territorial Jurisdiction of the United States (Count Two)
EIGHT	Assault with a Dangerous Weapon, with Intent to do Bodily Harm, within the Special Maritime and Territorial Jurisdiction of the United States (Count Three)
NINE	Assault on Officers or Employees of the United States with a Deadly Weapon (Count Four)
TEN	Injury to Buildings or Property and Placing Lives in Jeopardy within the Special Maritime and Territorial Jurisdiction of the United States (Count Five)

(Use of a Firearm During a Crime of Violence, in violation of 18 U.S.C. § 924(c)(1)(A)(iii) and (B)(ii))

A TRUE BILL

**FOREPERSON** 

Attorney of the United States in and for the District of Columbia