IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	CRIMINAL NO. GJH 16 cr 502
	*	
NELASH DAS,	*	**(Attempting to Provide Material**
a/k/a "Mohamed Das,"	*	**Support to a Foreign Terrorist**
	*	**Organization, 18 U.S.C. § 2339B;**
Defendant	*	**Forfeiture, 18 U.S.C. § 981(a)(1)(C) &**
	*	**(G), 21 U.S.C. § 853, 28 U.S.C.**
	*	**§ 2461(c))**
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INDICTMENT

COUNT ONE
(Attempting to Provide Material Support and Resources
to a Foreign Terrorist Organization)

The Grand Jury for the District of Maryland charges that:

Background on ISIL

1.   On or about October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act, and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224, to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary of State also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham ("ISIS"), the Islamic State of Iraq and Syria ("ISIS"), ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al

10/17/16

Islamiya, and Al-Furqan Establishment for Media Production.   On September 21, 2015, the

Secretary of State added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS.

To date, ISIL remains a designated FTO.

The Charge

2.   From in or about October 2015, until on or about September 30, 2016, in the

District of Maryland and elsewhere, the defendant,

NELASH DAS,
a/k/a "Mohamed Das,"

did knowingly attempt to provide material support and resources, including personnel

(specifically himself), to a foreign terrorist organization, namely ISIL, knowing that ISIL is a

designated terrorist organization and that ISIL has engaged, and engages, in terrorist activity and

terrorism.

18 U.S.C. § 2339B

FORFEITURE ALLEGATION

The United States Attorney for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C) & (G), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendant's conviction on Count One of this Indictment.

2. As a result of the offense set forth in Count One of this Indictment, the defendant,

NELASH DAS,
a/k/a "Mohamed Das,"

shall forfeit to the United States (a) any property, real and personal, which constitutes or is derived from proceeds traceable to the violation; and (b) all assets, foreign or domestic, (i) of the defendant; (ii) acquired and maintained by the defendant with the intent and for the purpose of supporting, planning, conducting, and concealing the violation; and (iii) derived from, involved in, and used and intended to be used to commit the violation.

Substitute Assets

3. If, as a result of any act or omission of the defendant, any such property subject to forfeiture:

    a. cannot be located upon the exercise of due diligence;

    b. has been transferred or sold to, or deposited with, a third person;

    c. has been placed beyond the jurisdiction of the Court;

    d. has been substantially diminished in value; or

    e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture

of any other property of said defendant up to the value of the forfeitable property.

18 U.S.C. § 981
21 U.S.C. § 853
28 U.S.C. § 2461(c)

_____
Rod J. Rosenstein
United States Attorney

A TRUE BILL:

_____   Date: October 17, 2016
Foreperson