

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
: **INFORMATION**
UNITED STATES OF AMERICA :
:
- v. - : 21 Cr.
:
YE HEIN ZAW, :
:
Defendant. :
- - - - - X

COUNT ONE

(Conspiracy to Assault a Foreign Official)

The United States Attorney charges:

1. From at least in or about July 2021, up to and including August 5, 2021, in the Southern District of New York and elsewhere, YE HEIN ZAW, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, in violation of Title 18, United States Code, Section 112(a).

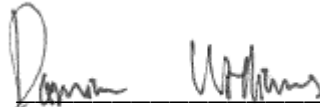
2. It was a part and object of the conspiracy that YE HEIN ZAW, the defendant, and others known and unknown, knowingly and intentionally would assault, strike, wound, imprison, and offer violence to a foreign official, to wit, the Myanmar Permanent Representative to the United Nations (the "Ambassador"), and make any other violent attack upon the person or liberty of such person, in violation of Title 18, United States Code, Section 112(a).

Overt Act

3. In furtherance of said conspiracy and to effectuate the illegal objects thereof, the following overt act, among others, were committed in the Southern District of New York:

a. On or about August 4, 2021, YE HEIN ZAW, the defendant, had a telephone call with a co-conspirator who was in Rye, New York, during which ZAW and the co-conspirator discussed the plan to hurt or kill the Ambassador as well as payment for the same.

(Title 18, United States Code, Section 371.)



DAMIAN WILLIAMS
United States Attorney
Southern District of New York

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(18 U.S.C. §§ 371, 112(a))

DAMIAN WILLIAMS

United States Attorney
