

JHK:JPL  
F. #2007R01968

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

S U P E R S E D I N G  
I N F O R M A T I O N

- against -

Cr. No. 08-823 (NGG) (S-1)  
(T. 18, U.S.C., §§  
2332(b)(2), 2339B(a)(1),  
2339B(d)(1)(A),  
2339D(a), 2339D(b)(1)  
and 3551 et seq.)

BRYANT NEAL VINAS,  
also known as "Ibrahim,"  
"Bashir al-Ameriki" and  
"Ben Yameen al-Kanadee,"

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE  
(Conspiracy To Murder U.S. Nationals)

1. In or about and between March 2008 and November 2008, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant BRYANT NEAL VINAS, also known as "Ibrahim," "Bashir al-Ameriki" and "Ben Yameen al-Kanadee," together with others, did knowingly, intentionally and with malice aforethought conspire to kill one or more nationals of the United States, to wit: United States military personnel, while such nationals of the United States were outside the United States.

2. In furtherance of the conspiracy and to effect its objectives, the defendant BRYANT NEAL VINAS, together with

others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. In or about September 2008, the defendant BRYANT NEAL VINAS, together with others, attempted a rocket attack against a United States military base in Afghanistan.

b. In or about September 2008, the defendant BRYANT NEAL VINAS, together with others, fired rockets at a United States military base in Afghanistan.

(Title 18, United States Code, Sections 2332(b)(2) and 3551 et seq.)

COUNT TWO

(Providing Material Support  
To A Foreign Terrorist Organization)

3. In or about and between March 2008 and November 2008, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant BRYANT NEAL VINAS, also known as "Ibrahim," "Bashir al-Ameriki" and "Ben Yameen al-Kanadee," did knowingly and intentionally provide material support and resources, as defined in 18 U.S.C. § 2339A(b), including expert advice and assistance, including assistance derived from specialized knowledge of the New York transit system and Long Island Railroad, communications equipment and personnel, including himself, to a foreign terrorist organization, to wit: Al Qaeda, which has been designated by the

Secretary of State as a foreign terrorist organization since October 1999, pursuant to Section 219 of the Immigration and Nationality Act.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d)(1)(A) and 3551 et seq.)

COUNT THREE

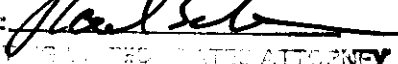
(Receiving Military-Type Training From  
A Foreign Terrorist Organization)

4. In or about and between March 2008 and August 2008, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant BRYANT NEAL VINAS, also known as "Ibrahim," "Bashir al-Ameriki" and "Ben Yameen al-Kanadee," did knowingly and intentionally receive military-type training from and on behalf of a foreign terrorist organization, to wit: Al Qaeda, which has been designated by the Secretary of State as a foreign terrorist organization since October 1999, pursuant to Section 219(a)(1) of the Immigration and Nationality Act.

(Title 18, United States Code, Sections 2339D(a), 2339D(b)(1) and 3551 et seq.)

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BENTON J. CAMPBELL  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACQUITTED UNITED ATTORNEY,  
RELIGIOUS FREEDOM ACT, 136