

**Dec 20, 2018**  
STEVEN M. LARIMORE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**18-60352-CR-MOORE/SNOW**  
CASE NO: \_\_\_\_\_

18 U.S.C. § 842(p)(2)(A)

**UNITED STATES OF AMERICA**

**vs.**

**TAYYAB TAHIR ISMAIL,**

**Defendant.**

\_\_\_\_\_ /

**INDICTMENT**

The Grand Jury charges:

**COUNT 1**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about July 15, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled "T.E.C.," with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 2**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about July 16, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled “A.C.,” with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 3**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about July 16, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled “A.C. Ver. 2000,” with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 4**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about August 23, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document entitled “B.b.C.S.O.T.A.I.M.,” with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

**COUNT 5**  
**Distributing Information**  
**Pertaining to Explosives**  
**(18 U.S.C. § 842(p)(2)(A))**

On or about September 17, 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**TAYYAB TAHIR ISMAIL,**

did knowingly distribute by any means information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a video depicting step-by-step instructions on how to construct a bomb, with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code,


Section 2332a; in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

A TRUE BILL

~~FOREPERSON~~



  
\_\_\_\_\_  
ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
KAREN E. GILBERT  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

v.

**CERTIFICATE OF TRIAL ATTORNEY\***

**TAYYAB TAHIR ISMAIL,**  
\_\_\_\_\_  
**Defendant.**

**Superseding Case Information:**

**Court Division:** (Select One)  
X Miami FTL    \_\_\_ Key West WPB    \_\_\_ FTP

New Defendant(s) Yes \_\_\_ No \_\_\_  
Number of New Defendants \_\_\_\_\_  
Total number of counts \_\_\_\_\_

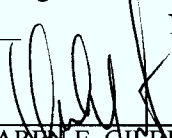
I do hereby certify that:

- 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) No  
List language and/or dialect \_\_\_\_\_
- This case will take 5 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u>X</u>	Petty _____
II 6 to 10 days _____	Minor _____
III 11 to 20 days _____	Misdem. _____
IV 21 to 60 days _____	Felony <u>X</u>
V 61 days and over _____	

6. 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. \_\_\_\_\_  
 Related Miscellaneous numbers: T8-mj-06588-Hunt  
 Defendant(s) in federal custody as of 12/14/2018  
 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 \_\_\_ No X
- 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 \_\_\_ No X

  
 \_\_\_\_\_  
 KAREN E. GILBERT  
 ASSISTANT UNITED STATES ATTORNEY  
 FL Bar No. 771007

\*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** Tayyab Tahir Ismail

**Case No:** \_\_\_\_\_

Counts #: 1-5

Distributing Information Pertaining to Explosives

Title 18, United States Code, Section 842(p)(2)(A)

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

Count #:  
\_\_\_\_\_  
\_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count #:  
\_\_\_\_\_  
\_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

Count #:  
\_\_\_\_\_  
\_\_\_\_\_

**\*Max. Penalty:** \_\_\_\_\_

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