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**SEALED**

**FILED**  
**Feb 18, 2021**  
CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

6 DMITRIY SLAVIN  
Trial Attorney  
7 National Security Division  
Counterterrorism Section  
8  
9 Attorneys for Plaintiff  
United States of America

10 IN THE UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 v.  
16 MURAT KURASHEV,  
17 Defendant.

CASE NO. 2:21-cr-0040 WBS  
VIOLATION: 18 U.S.C. § 2339B(a)(1) – Attempt to  
Provide Material Support to a Foreign Terrorist  
Organization

18  
19 INDICTMENT

20 COUNT ONE: [18 U.S.C § 2339B(a)(1) – Attempt to Provide Material Support to a Foreign Terrorist  
21 Organization]

22 The Grand Jury charges: T H A T

23 MURAT KURASHEV

24 defendant herein, beginning on a date unknown but no later than in or about July 2020, and continuing  
25 until in or about February 2021, in the Eastern District of California and elsewhere, did knowingly  
26 attempt to provide “material support or resources” as that term is defined in 18 U.S.C. § 2339A(b)(1),  
27 including financial support, to a foreign terrorist organization (FTO), namely, Hayat Tahrir al-Sham  
28 (HTS), which at all relevant times was designated by the Secretary of State as a Foreign Terrorist


1 Organization (FTO) pursuant to Section 219 of the Immigration and Nationality Act (INA), knowing  
2 that HTS was a designated foreign terrorist organization (as defined in 18 U.S.C. § 2339B(g)(6)), that  
3 HTS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and  
4 that HTS engages in and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign  
5 Relations Authorizations Act, Fiscal Years 1988 and 1989).

6 All in violation of 18 U.S.C. §§ 2339B(a)(1) and 2.

7 A TRUE BILL.

8 **/s/ Signature on file w/AUSA**

9  
10 FOREPERSON

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12 McGREGOR W. SCOTT  
13 United States Attorney

No. 2:21-cr-0040 WBS

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**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

THE UNITED STATES OF AMERICA

vs.

MURAT KURASHEV,

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**INDICTMENT**

**VIOLATION(S):** 18 U.S.C. § 2339B(a)(1) – Attempt to Provide Material Support to a Foreign Terrorist Organization

*A true bill,*

**/s/ Signature on file w/AUSA**

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*Foreman.*

Filed in open court this 18th day

of February, A.D. 2021

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*Clerk.*

Bail, \$ -----

Bench warrant —detention/bail  
To be determined at IA

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*Ann Clavin*  
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**United States v. Murat Kurashev**  
**Penalties for Indictment**

**Defendant**

**MURAT KURASHEV**

**COUNT 1:**

VIOLATION: 18 U.S.C. § 2339B(a)(1) - Attempt to Provide Material Support to a Foreign Terrorist Organization

PENALTIES: 20 years in prison; or  
Fine of up to \$250,000; or both fine and imprisonment  
Supervised release of any term of years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)