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Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

MAHIN KHAN (001),

Defendant.

Case No: CR2016-005270-001

79 SGJ 66

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: TERRORISM, a Class 2
Felony, in violation of A.R.S. § 13-
2308.01(A)(3);

**COUNT 2: CONSPIRACY TO
COMMIT TERRORISM**, a Class 2
Felony, in violation of A.R.S. § 13-
2308.01(A)(2);

**COUNT 3: CONSPIRACY TO COMMIT
MISCONDUCT INVOLVING
WEAPONS**, a Class 4 Felony, in violation
of A.R.S. § 13-3102(A)(3).

The Arizona State Grand Jury accuses **MAHIN KHAN**, charging on this 6th day of July, 2016 that in or from Maricopa County, Arizona:

COUNT 1

TERRORISM

On or between April 1, 2015 and July 1, 2016, **MAHIN KHAN**, solicited, incited or induced others to promote or further an act of terrorism to wit: at a Motor Vehicle Division office located in Maricopa County, Arizona, in violation of A.R.S. §§13-2308.01(A)(3), 13-2301, 13-701, 13-702, 13-703, and 13-801.

COUNT 2

CONSPIRACY TO COMMIT TERRORISM

On or between April 1, 2015 and July 1, 2016, **MAHIN KHAN**, conspired to commit terrorism, in violation of A.R.S. §§13-1003, 13-2308.01(A)(2), 13-2301, 13-701, 13-702, 13-703, and 13-801.

Said offense occurred when **MAHIN KHAN** with the intent to promote or aid the commission of an offense, to wit: terrorism at a Motor Vehicle Division office located in Maricopa County, Arizona, a felony upon the person of another, agreed with one or more persons that at least one of them or another person would engage in conduct constituting the offense, in violation of A.R.S. §§ 13-1003, 13-2308.01(A)(2), 13-2301, 13-701, 13-702, 13-703, and 13-801.

COUNT 3

CONSPIRACY TO COMMIT MISCONDUCT INVOLVING WEAPONS

On or between April 1, 2015 and July 1, 2016, **MAHIN KHAN**, conspired to commit misconduct involving weapons, in violation of A.R.S. §§13-1003, 13-3102(A)(2), 13-3201(A)(8), 13-701, 13-702, 13-703, and 13-801.

Said offense occurred when **MAHIN KHAN** with the intent to promote or aid the commission of an offense, to wit: misconduct involving weapons, agreed with one or more persons that at least one of them or another person would engage in conduct constituting the

offense, and **MAHIN KHAN** committed overt acts in furtherance of the conspiracy to wit: furnished instructions on how to construct an improvised explosive device and directed another individual to purchase materials to build an improvised explosive device, in violation of A.R.S. §§ 13-1003, 13-3102(A)(2), 13-3201(A)(8)(viii), 13-701, 13-702, 13-703, and 13-801.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa and Pima Counties, Arizona.

(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

SCOTT W. BLAKE
Assistant Attorney General

Foreperson of the State Grand Jury

#5184697