

MARK BRNOVICH  
Attorney General  
Firm Bar No. 14000

BLAINE GADOW  
State Bar No. 015741  
SCOTT W. BLAKE  
State Bar No. 025068  
Assistant Attorney General  
1275 West Washington Street  
Phoenix, Arizona 85007-2926  
Telephone (602) 542-3881  
crmfraud@azag.gov

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 6<sup>th</sup> 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.

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(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: \_\_\_\_\_

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SCOTT W. BLAKE  
Assistant Attorney General

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Foreperson of the State Grand Jury

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