

# MEMORANDUM

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**From:** Yousef Taha, Esq. Research & Writing Attorney

**Date:** July 29, 2015

**RE:** ISIS-Related Prosecutions in the United States through July 29, 2015

Between March 2014 and July 2015 we have witnessed sixty-four (64) individuals (excluding Mufid Elfgeeh in WDNY) arrested and charged in the United States in connection with ISIS. The first ISIS-related arrest was on March 16, 2014 when Nicholas Teausant was arrested in Blaine, Washington and the most recent on July 28, 2015 when Arafat Nagi was arrested in Lackawanna, New York. An additional three (3) individuals with ties to ISIS have been killed by law enforcement officials. These three individuals were Nadir Soofi and Elton Simpson in Garland, Texas on May 3, 2015 and Usama Rahim in Boston, Massachusetts on June 2, 2015.

Of the sixty-four (64) individuals charged with federal crimes in connection with ISIS, twenty (20) of them are considered to be “domestic plotters.” These individuals are accused by the federal government of plotting attacks in the United States on behalf of ISIS. According to the government, the other individuals have either attempted to travel, or facilitate the travel of others in hopes of joining ISIS, while the remaining few have sent money and/or equipment to ISIS members. Only ten (10) of the sixty-two (62) individuals have taken a guilty plea, with only five (5) having been sentenced. The longest sentence received thus far has been 243 months for Donald Ray Morgan with the shortest being 48 months for Shannon Maureen Conley. Thus far, none of the cases related to ISIS have gone to trial. This memorandum will chronicle all of the sixty-two (62) individuals arrested and charged in the United States in connection with ISIS.

1. **Name(s):** Arafat M. Nagi

**District:** Western District of New York

**Arrest Date:** July 28, 2015

**Procedural Posture:** On July 28, 2015 Nagi was arrested and charged in a complaint of Attempting to Provide Material Support to a Foreign Terrorist Organization. A detention hearing is scheduled for Friday July 31, 2015.

**Charges:**

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

**Facts:**

Arafat Nagi is a forty-four (44) year old Yemeni-American male from Lackawanna, New York. Nagi was born and raised in Lackawanna. His family is originally from Nadra, Yemen. He is a divorced father of two adult children. In 1990 he was arrested for assault after allegedly stabbing a man over 50 cents during an altercation outside of a convenience store. In 2013 he was arrested for menacing and criminal possession of a weapon after his daughter called law enforcement and told them that her father threatened to kill her. Nagi is an associate of the “Lackawanna Six” and was in the same house as some of the defendants when they were arrested over a decade ago. However, Nagi was never arrested in relation to the “Lackawanna Six”.

According to the complaint, on August 28, 2014 the FBI interviewed a person who is cooperating with the government (Informant #1) regarding Nagi. Informant #1 was previously convicted of a terrorism offense. The informant advised the FBI that Nagi frequently talks about jihad to various people in the community and that it was common for Nagi to get into verbal altercations over his jihadi beliefs. The informant also informed the FBI that Nagi had recently traveled to Turkey.

On September 19, 2014 Nagi returned to the U.S. and was interviewed by U.S. Customs and Border Protection at the Detroit International Airport. Nagi informed officials he traveled to Istanbul for 10 days of vacation to get away from family and then spent the rest of his trip in Yemen visiting relatives. Nagi further stated that he does not support ISIS, Al Qaeda or any other terrorist organizations. The FBI also searched US Customs records to confirm that Nagi took a

one-day trip in 2012 from John F. Kennedy International Airport to Istanbul, Turkey. He departed JFK on October 20, 2012, landed in Turkey, and returned back to the United States on October 21<sup>st</sup>. On November 4, 2014 a magistrate judge authorized a search and seizure warrant for 3 electronic devices belonging to Nagi. According to a text message conversation retrieved on Nagi's phone following the search, he was asked by a relative how his trip to Syria and Turkey was. Nagi indicated he had to take an emergency flight back to the U.S. following a gall bladder infection. The complaint further alleges that Nagi purchased a tactical vest, army combat shirt, body armor, a "Shahada" flag, and combat boots before his trip to Turkey in 2012. Nagi continued to purchase military combat items before his trip to Turkey in 2014. These items included an Islamic headband, military camouflage pants, Kevlar tactical gloves, a military hunting knife, and night-vision goggles.

Following the interview with the informant in 2014, the FBI conducted a search of all of the social media websites associated with Nagi. A search of his twitter page, @farooq\_quhaif found over 7,000 tweets, with the majority of them in Arabic. The complaint alleges that Nagi made an oath to Abu Bakr Al- Baghdadi via tweet in 2014, months before his trip to Turkey. On April 17, 2014 Nagi tweeted out several statements in support of senior ISIS figures including Abu Mohammed al-Adnani. Between April 2014 and Nagi's return to the United States in September 2014, he sent out hundreds of tweets depicting pro-ISIS pictures, videos, and slogans. The FBI alleges Nagi deactivated his twitter account following the interview with Customs Officials at the Detroit Airport in 2014.

The FBI also searched a TangoME account associated with Nagi's iPhone. TangoME is a mobile messaging service used by users to send messages to other users across the globe, without being charged extra by their service provider through conventional text messages. The search found several messages between Nagi and his sister in which she enquires into whether he was able to successfully enter Syria from Turkey and join ISIS. Another conversation between Nagi and his son indicated that Nagi had made legitimate connections with ISIS-facilitators in Turkey, but was just waiting for a religious holiday to finish so he could find safe passage into Syria. A review of Nagi's iPad found several maps showing routes to enter Syria from Turkey as well as showing maps of ISIS-controlled border crossings.

On December 2, 2014 the FBI interviewed another associate of Nagi's (Informant #2) who told Agents that Nagi had told him he believed he was being followed by Turkish

intelligence officials during his stay in Turkey, and thus backed out of his plan to join ISIS. Informant #2 told the FBI that Nagi told him he pledged allegiance to ISIS, was angered at U.S. foreign policy in the Middle East, and expressed radical political and religious views. Informant # 2 expressed concern that Nagi may “do something” in the United States. During another interview with Informant #2 on February 26, 2015, the informant told the FBI that Nagi told him he was awaiting a settlement from an insurance claim in order to purchase another ticket to Turkey in hopes of finally joining ISIS. In March 2015, Informant #2 told the FBI that Nagi indicated he would leave to join ISIS “any month now.” An arrest warrant was issued for Nagi on July 28, 2015.

2. **Name(s):** Harlem Suarez a/k/a Almlak Benitez

**District:** Southern District of Florida

**Arrest Date:** July 27, 2015

**Procedural Posture:** On July 27, 2015 Suarez was arrested and charged in a complaint of Attempted Use of a Weapon of Mass Destruction. A detention hearing is scheduled for Monday August 3, 2015.

**Charges:**

18 U.S.C. § 2322(2) – Attempted Use of a Weapon of Mass Destruction

**Facts:** Harlem Suarez is a twenty-three (23) year old Cuban-American male from Stock Island, Florida. According to media outlets, Suarez lived with his father in his home on the island community. A former co-worker of Suarez’s described him as “a little slow” in reference to his mental capabilities and believed he was mentally ill.

According to the complaint, on April 15, 2015 the FBI received a report from the Palm Beach County Sherriff’s Office regarding a Facebook account having a username of “Almlak Benitez.” An identified complainant phoned the local Sherriff’s office after receiving a friend request from the user. The complainant informed law enforcement that the profile had “extremist rhetoric” and was attempting to recruit the complainant to join the Islamic State. An FBI review of the profile included a posting which included “We are the Islamic State, we are ISIS Muslims.” The FBI concluded that Harlem Suarez is the user of the “Almlak Benitez” Facebook

account after receiving account records from the website and being advised by AT&T that the IP address in question, all resolved to the same subscriber; a “Bernardo Suarez” who is Harlem’s father. The FBI conducted an open source review of social media pages for “Harlem Suarez” and was able to find his Facebook account with his government name. A public viewing of the account listed his “likes” as “jihadist”, “extraordinary prayer for ISIS”, and “Prayers for ISIS: Weapons of our Warfare.”

In May 2015, an FBI confidential human source (CHS) initiated contact with Suarez via his “Almlak Benitez” Facebook account. On May 3, the two had a private Facebook chat on the subject of preparing for violent jihad against the United States. Suarez told the CHS he did not trust Facebook and repeatedly ask the source to delete his messages after their conversation. He also informed the source he had two Glock handguns and wanted to obtain a “long one.” During the chat, Suarez indicated his desire to make a “timers bomb”, but had not received any instructions on how to construct one yet. He went on to add that the two of them needed to “recruit, keep calm, train, and utilize multiple means of communication.” Suarez continued to post pro- ISIS videos, posts, and links throughout May and June 2015 on his Almlak Benitez account.

On May 5, 2015 Suarez and CHS exchanged text messages regarding the building of a bomb. Suarez asked the CHS if he knew how to build a bomb and indicated to the CHS that he wanted to learn how to make a controller bomb. On the same day, Suarez called CHS and stated that he thought about traveling to the Middle East and that he had been trying to contact someone from Syria, but was unsuccessful in making personal connections with the area. On May 7, 2015 a pawn shop owner contacted the FBI and advised that Suarez had visited the store and informed an employee that he had ordered two AK-47 assault rifles on the internet that would be sent to the pawn shop and that he would then retrieve them later. FBI agents contacted the website company where Suarez purportedly ordered the rifles and confirmed that Suarez placed an internet order for a single AK-47 using his true name and address with an expected delivery date of May 11, 2015. When Suarez went to pick up the AK-47, he incorrectly filled out the paperwork and was not allowed to take possession of the rifle.

On May 15, 2015 Suarez and the CHS met in person in which Suarez indicated to the CHS he wanted to film an ISIS recruitment video. Suarez dictated a script for the video and showed the CHS. The script called on Muslims across the globe to join the “Caliphate” and to

destroy America. On May 23, Suarez and the CHS recorded the ISIS recruitment video in a motel room located in Homestead, Florida. Suarez donned a black bulletproof vest during the recording and read his script while CHS recorded the video. After the video, Suarez and CHS discussed plans for an attack in the United States around the 4<sup>th</sup> of July holiday.

On June 3, 2015 CHS introduced Suarez to an FBI Undercover employee (UCE#1) who purported to be an explosives dealer. Suarez indicated to CHS and UCE #1 that he wanted to purchase explosives and set off multiple bombs across southern Florida beaches that would cause mass casualties. In further conversations between the three via text message and phone conversations, UCE #1 indicated to Suarez that grenades would cost him \$150 per grenade while a backpack filled with explosives would be \$100. Between June 3, 2015 and July 19, 2015 the three individuals conducted several meetings amongst themselves in which they discussed their plans to set off explosives. On July 19<sup>th</sup> Suarez met with UCE#1 and provided him \$100 to pay for the construction of an explosive device with materials he was instructed to purchase from a local Home Depot. Suarez provided the UCE #1 with two boxes of galvanized nails, a pre-paid cellphone, and a backpack for use in the detonation of the bomb. Suarez discussed taking the bomb once construction was complete and placing it on a public beach and then detonating the device as he saw people walk by. On July 23, 2015 Suarez and CHS conducted a telephone conversation in which Suarez was told that an associate of UCE would contact him once the bomb was constructed. This individual was another undercover employee of the FBI (UCE #2). The next day, UCE #2 called Suarez and told him his bomb would be ready to pick up on July 27, 2015. On that day, Suarez met with UCE# 2 and entered UCE #2 vehicle. UCE #2 showed Suarez how to operate the explosive device which was actually inert and could not detonate. After Suarez exited the vehicle with the purported bomb he was arrested on sight by law enforcement.

3. **Name(s):** Alexander Ciccolo a/k/a Ali Al Amriki

**District:** District of Massachusetts

**Arrest Date:** July 4, 2015

**Procedural Posture:** On July 4, 2015 Ciccolo was arrested and charged in a complaint of felon in possession of firearms. On July 6, 2015 Ciccolo appeared in court and

received appointed counsel. A detention hearing was held on July 14, 2015 in which the court held that Ciccolo must be detained pending trial. On July 23, 2015 Ciccolo was indicted on two counts; Felon in Possession of a Firearm and Assault with a Dangerous Weapon Causing Bodily Harm.

**Charges:**

18 U.S.C. § 922(g) - Felon in Possession of a Firearm

18 U.S.C. § 111 (a) (1) & (b) – Assault with a Dangerous Weapon Causing Bodily Harm

**Facts:**

Alexander Ciccolo is a twenty-three (23) year-old Caucasian male from Adams, Massachusetts According to media outlets, Ciccolo’s father is Boston police Captain Robert Ciccolo, a twenty-four year veteran of the Boston police department. Ciccolo has a history of mental health issues, drug and alcohol abuse, and was first brought to the attention of the Boston Joint Terrorism Task Force by his father who called the FBI and informed them that his estranged son was no longer taking his medication and seemed to be obsessed with radical Islam. Robert Ciccolo is claimed to have told FBI officials that his son was “off the deep end” and had sent him several text messages condemning America and calling Americans “disgusting”, as well as discussing his desire to join ISIS.

According to the complaint, Alexander Ciccolo was convicted on February 17, 2015 of Operating a Vehicle Under the Influence of Liquor, a violation of Massachusetts state law and punishable by up to 30 months imprisonment. Ciccolo was placed on probation following his conviction. In the fall of 2014, the FBI became aware of Ciccolo’s desire to go overseas to fight for ISIS, following the call from his father informing FBI officials that his son had a history of mental illness and in the last 18 months he had become “obsessed” with radical Islam. On October 17, 2014 the FBI discovered Ciccolo’s Facebook profile with the profile name of “Ali Al Amriki.” The Facebook page included photographs and pictures in support of ISIS, with one image showing a picture of a dead U.S. Marine with the caption “Thank you Islamic State!”

The FBI introduced a cooperating witness (CW1) to Ciccolo in 2015 with the hopes of luring Ciccolo into a plot of attempting to commit an act of terrorism within the United States. On June 24, 2015 Ciccolo had an in-person meeting with CW1 in which they discussed the possibility of conducting an attack on U.S. soil through the use of pressure cooker bombs. The

two discussed the possibility of setting off the bombs near police stations and two different bars within the area. In a separate meeting later that week, Ciccolo and CW1 continued to talk about their plan to conduct a terrorist attack, but this time in another state. Ciccolo requested a list of firearms including AK-47's, sniper rifles, and handguns that he wished to purchase in furtherance of their attempt to conduct an attack. Ciccolo indicated that he had changed his plan to attack the bars and police station and had now set his sights on a college cafeteria.

On July 2, 2015 CW1 told Ciccolo in an online conversation that he would be able to help him purchase his requested firearms. Following the conversation, Ciccolo purchased a pressure cooker from a local Wal-Mart as well as materials needed to construct makeshift Molotov cocktails. Hours later, Ciccolo informed CW1 that he had purchased the materials and already made ten firebombs. Ciccolo went on to inquire about the status of the firearms and whether or not CW1 would be able to provide them. CW1 indicated that he would have the guns ready for Ciccolo within the next few days.

On July 4, 2015 Ciccolo picked up four firearms that he had previously requested from CW1 including a : .223 Colt AR-15 rifle, a 556 Sig Arms SG550 rifle, a 9mm Glock 17 handgun, and a 10mm Glock 20 handgun. Ciccolo was arrested an hour later on a public roadway as he was walking back to his apartment with the firearms in a green duffle bag. A search of his apartment found several partially constructed Molotov cocktails.

Following his arrest, Ciccolo waived Miranda and spoke with two FBI agents. He refused to discuss the guns, but went on several rants in support of ISIS. Following the interview he was taken to the Franklin County House of Correction for processing. During his processing he met with a nurse for a routine medical exam. During the meeting, Ciccolo allegedly grabbed a pen and stabbed the nurse in the head, leaving a severe hole in the nurse's skin. Pictures of the nurse's head following the alleged attack have been released by the US Attorney's Office and show a blood-covered puncture in the back of a head.

4. **Name(s):** Justin Nojan Sullivan

**District:** Western District of North Carolina

**Arrest Date:** June 2015

**Procedural Posture:** Probable Cause found following Preliminary Hearing on 7/9/2015. Detention Hearing waived and client detained pending trial. Next court date undetermined.

**Charges:**

18 U.S.C. § 2339 B- Attempting to Provide Material Support to a Designated Foreign Terrorist Organization

18 U.S.C. § 924 B- Receipt of a Silencer in Interstate Commerce with Intent to Commit a Felony

26 U.S.C. § 5861- Receipt and Possession of an Unregistered Silencer, Unidentified by a Serial Number

**Facts:**

Justin Nojan Sullivan is a nineteen (19) year-old Caucasian teenager from Morganton, North Carolina, a small town located on the Northwest border of the state. According to the complaint, the investigation started in April 2015 after Justin's father called "911" to request police assistance at the family's residence. In his "911" call, Justin's father said "*I don't know if it is ISIS or what, but he is destroying Buddhas, and figurines, and stuff.*" This was not Sullivan's first time attempting to destroy his father's religious figures. During the "911" call Sullivan was irate and could be heard in the background yelling "*why are you trying to say I am a terrorist... they are going to put me in jail for my whole life... they are going to kill me.*"

According to the complaint, on June 6, 2015 the FBI used an undercover employee (hereinafter "UC") and made contact with Sullivan online. Sullivan described himself as a recent Muslim convert and "*a Mujahid*", or one who fights for Jihad. Online conversations continued between Sullivan and the UC which included talks of revenge against the "*kuffar*", or infidels for attacks in Muslim countries. Sullivan stressed the importance of "*fighting the war here*" as opposed to trying to travel to Syria to join the Islamic State. He asked the UC to join his self-proclaimed cell, "*The Islamic State of North America*", which would carry out guerilla warfare in the United States and "*swear allegiance to amir al mukminin and the Islamic state.*"

The conversations quickly shifted from Sullivan's rants about Jihad for the sake of Allah to concrete ideas about obtaining silencers or "suppressors" as Sullivan referred to them. During an online conversation on June 8, 2015 Sullivan stated "*we'll be using homemade suppressors in*

*and out and we'll kill 500 then we'll leave inshallah.*” Further conversations with the UC resulted in Sullivan discussing his plans to use cyanide covered bullets to carry out his attack as well as setting off a gas bomb to *“finish off the job.”* The UC told Sullivan he could make the homemade silencers on his own and send them to Sullivan.

It appears that Sullivan began to question the legitimacy of his partner in Jihad as he asked the UC to “silently” kill a person to make sure he was legitimate with his intentions of Jihad, and also asked if he (Sullivan) could get arrested for picking up the package of silencers at his home address. In another online conversation on June 9, 2015, Sullivan stated that he would be able to obtain an AR-15 assault rifle from a gun show in Manassas, Virginia which was scheduled to take place the weekend of June 20<sup>th</sup>. Sullivan’s statements stemmed from his constant viewing of newscasts and YouTube clips showing U.S. air strikes against the Islamic State. He would tell the UC that their attack was in retaliation for the airstrikes and would stop U.S. involvement in Syria.

The FBI built a functional silencer that did not bear the required serial number, nor was it registered to Sullivan or any person in the National Firearms Registration and Transfer Record. Sullivan requested that the UC send the silencer via USPS and provided his home address. In an attempt to throw off any suspicion and in an act of counter-surveillance Sullivan requested that the UC write *“To Gus Gus”* on the package and *“Happy Birthday.”* Once Sullivan’s mother picked up the package on her doorstep on June 19<sup>th</sup>, the FBI conducted a search of the residence with the consent of his mother and a federal search warrant. Sullivan initially told his parents as well as the FBI agent that the silencer was a filter to catch cleaning solvent. The FBI soon thereafter arrested Sullivan, along with seizing \$689 in cash in Sullivan’s bedroom. Sullivan waived Miranda and admitted to discussing the attack in support of ISIS. He also stated that he “didn’t mean it”, he looked up places in the online yellow pages for places to attack nearby, and he planned on conducting his purported attack between June 21, 2015 and June 23, 2015. Sullivan also told the FBI that he would purchase his gun for the attack from the gun show and asked the UC to kill his parents on multiple occasions.

5. **Name(s):** Amir Said Rahman Al- Ghazi a/k/a Robert C. McCollum

**District:** Northern District of Ohio

**Arrest Date:** June 2015

**Procedural Posture:** Defendant in custody following waiver of Preliminary and Detention Hearings. On July 16, 2015. Amir Said Al-Ghazi was indicted on July 16, 2015. A twenty-eight (28) count indictment was filed against him in the Northern District of Ohio. Twenty-four (24) of the counts are attributed to the marijuana transactions conducted between Al-Ghazi and a confidential human source.

**Charges:**

18 U.S.C. § 2339 B- Attempting to Provide Material Support to a Designated Foreign Terrorist Organization

18 U.S.C. § 922 (g) (1) - Felon in Possession of a firearm

18 U.S.C. § 922 (g) (1) - Felon in Possession of a firearm

21 U.S.C. § 841 (a) (1) and (b) (1) (D) - Distribution of Marijuana, a Schedule I Controlled Substance (24 counts)

**Facts:**

Amir Said Rahman Al- Ghazi a/k/a Robert C. McCollum is a thirty-eight (38) year old African-American man from North Olmstead, Ohio; a suburb of Cleveland. Al-Ghazi legally changed his name from Robert McCollum to his Muslim name in January of this year. According to the complaint, Al-Ghazi maintained two twitter profiles, a Google+ “Plus” Profile, a YouTube profile, and frequently visited and posted on US Message Board under the profile “Amir Muwahid.”

Al-Ghazi first came under the radar of the Cleveland FBI Joint Terrorism Task Force in September 2013 when the JTTF conducted two interviews with Al-Ghazi, both of which are not discussed thoroughly in the complaint, although he later mentions the interviews to a confidential human source (hereinafter CHS #1). In August of 2014 Al-Ghazi first made contact with CHS #1 who was a paid informant working with the FBI for over three (3) years and then in February of 2015 made contact with CHS #2. CHS#2 worked for the FBI for over three (3) years and has an

extensive criminal history in which he was able to receive sentencing benefits as a result of his work with the FBI.

On June 18, 2014 Al-Ghazi pledged his allegiance to ISIS in a Facebook post, and positively replied to CHS #1 in an online post indicating that he made an oath to Abu Bakr Al-Baghdadi. Throughout late 2014 and into 2015, Al-Ghazi used all forms of social media to post materials in support of ISIS and often commented and congratulated ISIS for battlefield victories. Al-Ghazi would also post threats on the US Message Board Profile indicating that ISIS would attack the United States and time is closing in on the United States because Muslims in America would start to conduct their own domestic attacks.

In April 2015, the FBI became aware of the fact that Al-Ghazi was also communicating online with another CHS (CHS#3) who purported to be an ISIS soldier located in Mosul, Iraq. CHS #1 and CHS #2 began to use several different online personas using Google+ to falsely claim they were also ISIS soldiers located throughout Iraq and Syria. From February 2015 until his arrest in June, all three informants asked for Al-Ghazi to create his own online videos and post them on YouTube. The purpose of the videos were to call out westerners to commit jihad against America, pledge allegiance to ISIS, and condemn any Muslim leaders in the West that have been critical of ISIS. Throughout this time period all three informants continued to ask Al-Ghazi if he remained loyal to Al-Baghdadi and ISIS, seeking to reaffirm his allegiance to the Islamic State.

In May 2015, Al-Ghazi tells CHS #1 he owns a .45 caliber handgun but would like his assistance in obtaining an AK-47 for the purpose of using it while recording recruitment videos. After creating his first Jihad or "Dawa" video Al-Ghazi sends a private YouTube link to CHS#1 who was using a fake online persona as an ISIS fighter in Iraq. CHS #1 said he would show top ISIS commanders the preview video for their approval. The next day, the informant told Al-Ghazi that the video was approved by top ISIS officials and would soon be translated and distributed throughout the globe once translators were able to add subtitles to the video.

At the same time the FBI was investigating Al-Ghazi for his ties to ISIS they were also setting him up for selling marijuana. Between February 2014 and June 2015, CHS #2 conducted twenty-four (24) controlled marijuana transactions with Al-Ghazi. During these transactions, the informant would purchase marijuana from Al-Ghazi with FBI provided money. The informant would purchase the marijuana in the parking lot of Al-Ghazi's apartment. The transactions

yielded a total package weight of 1954.99 grams, and all were recorded on camera as well as audio recordings.

In the spring of 2015, Al-Ghazi attempted to purchase an AK-47 from several individuals in the Cleveland area, but was unsuccessful several times. CHS #3 indicated to Al-Ghazi that he had a supplier for him and setup the meeting to conduct the transaction. On June 19, 2015 Al-Ghazi purchased an AK-47 assault rifle from an FBI undercover employee. Al-Ghazi was arrested following the transaction and a search warrant was conducted on his residence which resulted in the confiscation of a .45 caliber Taurus handgun, a sword, and an ISIS flag.

6. **Name(s):** Munther Omar Saleh, Fareed Mumuni, Samuel Rahamin Topaz & Alaa Sadeh

**District(s):** Eastern District of New York (Saleh & Mumuni), District Court of New Jersey (Sadeh & Topaz)

**Arrest Date:** Between June 17, 2015 and June 29, 2015.

**Procedural Posture:** Alaa Saadeh was arrested on June 29, 2015. Mumuni and Saleh have both been detained following detention hearings. Topaz filed a continuance on June 27, indicating defense counsel and the prosecution are nearing a plea deal within the next 30 days.

**Charges:**

18 U.S.C. § 1114- Attempted Murder of a Federal Officer (Mumuni)

18 U.S.C. § 2339 B- Attempting to Provide Material Support to a Designated Foreign Terrorist Organization (Saleh)

18 U.S.C. § 2339B (a) (1) – Conspiracy to Provide Material Support to a Foreign Terrorist Organization (Topaz, Saadeh & Saleh)

18 U.S.C. § 2339B (a) (1) & (2) – Aiding and Abetting Attempt to Provide Material Support and Resources to a Foreign Terrorist Organization (Saadeh)

18 U.S.C. § 1512(b) (3) Witness Tampering (Saadeh)

**Facts:** Munther Omar Saleh, Fareed Mumuni, Samuel Rahamin Topaz, Alaa Saadeh, and Saadeh's "unnamed" (media reports indicate his name as "Nader") younger brother are all friends ranging in ages from 19 to 23 years old. Saleh, Topaz, and Saadeh began hanging out with one another more frequently over the past year as Saadeh and his brother had become more religious and with Topaz conversion to Islam last year. The three boys knew each other throughout childhood attending the same schools in Bergen County, New Jersey. However, one of Topaz's parents who is listed as "Individual 1" in his complaint, grew more suspicious of his new found friends after hearing several discussions at home regarding the Islamic State and traveling overseas to the Dawla. Individual 1 grew so suspicious of him and his friends, that in March 2015 they placed a call to the JTTF in fear of their son going to Syria to join ISIS.

During late 2014 and early 2015, Saadeh and his brother (hereinafter CC#1) were in the process of traveling to Jordan in hopes of joining ISIS in Syria. Their roommate, listed as "Individual 1" in Saadeh's complaint, lived with the brothers for several years. The Saadeh brothers are of Palestinian descent who were born in Jordan and moved to the United States at a very young age. The boys spent the majority of their teenage years in America without an adult figure in their lives, as their parents were convicted of food stamp fraud in the early 2000's and deported to Jordan.

According to Individual 1 and a former friend (Individual 2 in the Complaint) the two brothers became transfixed on Jihad and joining the Islamic State. They began to only speak Arabic when Individual 1 was around, grew out their beards, and openly praised the Islamic State. The brothers would watch videos of Anwar Al-Awlaki and asked Individual 1 and Individual 2 to join them.

In late spring 2015, Saadeh purchased his brother's plane ticket to Jordan. He drove his brother to the Newark International Airport with Saleh and Individual 1. Unbeknownst to the boys, Individual 1 had already placed a call to the JTTF in April, informing them of his suspicions regarding the Saadeh brothers. Individual 1 wore a recording device during the ride to the airport. During the ride, the Saadeh brothers and their cousin Munther Saleh discussed their support for ISIS, and CC#1's next step to successfully join ISIS once he arrived in Jordan. Prior

to CC#1 departing, Saadeh asked for his cellphone and removed the SIM Card and reset the phone so as to avoid any surveillance by the FBI. Once the younger brother reached Jordan he was placed under arrest by Jordanian officials. As Saadeh received the news of his brother's arrest and watched news reports of his friends (Saleh and Mumuni) getting arrested he began telling Individual 1 and Individual 2 to "play dumb" if the FBI called them. He explicitly told Individual 1 and Individual 2 to lie about any statements he may have made in the past regarding his views on ISIS as well as the going away party he threw for his younger brother.

Munther Saleh and the Saadeh brothers were reportedly distant cousins. Saleh was extremely vocal in his support of ISIS on social media including his twitter account. Electronic surveillance of Saleh's email showed several documents related to speeches members of ISIS gave in Arabic that he was working on translating. Saleh is also of Palestinian descent and spent most of his childhood living in the West Bank and Jordan. In March of 2015, Saleh was seen on two separate occasions by Port Authority Officers walking along the George Washington Bridge. This resulted in Saleh being interviewed by an officer from the JTTF and having his computer searched. The findings of the computer showed several documents in English and Arabic, including the writings of Sheikh Abu Bara Al-Sayf, one of the most prominent religious figures of ISIS. Saleh was then under judicially authorized electronic surveillance between May 7 and June 13. The FBI then intercepted several emails he sent to himself showing instructions on how to build a pressure cooker bomb, popular New York City tourist attractions, as well as online searches for other bomb making materials such as a garden hose, a pipe, propane, and a watch.

A CHS exchanged an online conversation with Saleh on May 7 in which Saleh indicated that he lived in New York and was trying to conduct an "op". A week later, Saleh told the CHS he could no longer talk to him as he was instructed by ISIS officials to be discreet. On the date of Saleh's arrest, he was spotted in Queens at 4 a.m. in a green jeep with an unnamed 17 year-old male. Both were arrested, but not before an attempted "attack" on the marked vehicle. The complaint alleges the two of them tried to run into the driver-side door of the FBI vehicle and attack the Agent. Both were arrested on site by other members of the JTTF. The identity of the 17 year-old male has remained sealed, but media outlets have reported he is only facing state charges in New York.

Topaz befriended the Saadeh brothers during high school as they both grew up in Fort Lee, NJ. He was a recent convert to Islam that met daily with them following his conversion.

These meetings startled his family who became worried after over hearing several conversations that included talks of the Islamic State and traveling overseas. Topaz' mother hid his passport in fears that her son would leave the country to join ISIS in Syria. She called the FBI to warn them of the friends' possible aspirations of traveling overseas to join the Islamic State. Following the phone call, Topaz was placed under electronic surveillance by the FBI. The FBI intercepted several messages to the Saadeh brothers in which he discusses saving money to purchase a plane ticket to Turkey in hopes of joining ISIS in Syria.

According to Mumuni's complaint, he met with Saleh several times in May 2015, and based on a recorded phone call between Saleh and the unnamed 17 year old, a specific meeting with Saleh and Mumuni was described as "*motivating*" and "*great*". This suggested to the FBI that Mumuni "*may have been involved in Saleh's planning for a terrorist attack.*" Saleh was arrested on June 13 and after waiving Miranda he stated that Mumuni planned to travel to the Islamic State and also expressed his intent to attack members of law enforcement. On June 17, 2015 FBI Agents went to Mumuni's family home to execute a search warrant. When they arrived Mumuni lunged at the officers with a large kitchen knife. He was restrained and arrested. A search of his mother's car, which she allows Mumuni to drive, discovered a duffel bag containing another large kitchen knife. After waiving Miranda, Mumuni stated that he pledged allegiance to ISIS and intended to travel to the Islamic State. He also admitted to discussing the construction of a pressure cooker bomb with Saleh and his intentions of attacking law enforcement officials if they attempted to arrest him at any time during his "membership" with ISIS.

7. **Name(s):** Abdurasul Hasanovich Juraboev, Akhror Saidakhmetov, Abror Habibov, Dilkhayot Kasimov & Akmal Zakirov

**District(s):** Eastern District of New York

**Arrest Date:** Between March 2015 when Saidakhmentov was arrested at John F. Kennedy International Airport and June 8, 2015 when a Superseding Indictment was filed charging Zakirov.

**Procedural Posture:** A superseding indictment was filed in the E.D.N.Y. on June 8 charging Zakirov with Conspiracy and Attempted Support. All 5 men were in court on June 16, 2015 for a status conference where a continuance was ordered from 6/16/15 to 9/10/15. All 5 men have been detained to the custody of the U.S. Marshal.

**Charges:**

18 U.S.C. § 2339B (a) (1) - Conspiracy to Provide Material Support to a Foreign Terrorist Organization (Juraboev, Saidakhmetov, Habibov, Kasimov, Zakirov)

18 U.S.C. § 2339B (a) (1) –Attempt to Provide Material Support to a Foreign Terrorist Organization (Juraboev, Saidakhmetov, Habibov, Kasimov, Zakirov)

18 U.S.C. § 924 (o) – Conspiracy to Use a Firearm (Saidakhmetov & Habibov)

18 U.S.C. § 1546(a) Travel Document Fraud (Saidakhmetov)

**Facts:** Abror Habibov (Habibov) is a 30 year-old citizen of Uzbekistan that lives in Brooklyn. He owns mall kiosks throughout the country selling kitchenware, mobile-phone repair stations, hair supplies, tools, accessories, etc. His kiosks are located inside malls in Florida, Georgia, Pennsylvania, and Virginia. During the fall and winter of 2014 Habibov employed Akhror Saidakhmentov (Saidakhmentov) and Abdurasul Hasanovich Juraboev (Juraboev) at these kiosks. According to the Complaint, Habibov paid for the plane tickets for Saidakhmentov and Juraboev to travel to Turkey in hopes of joining ISIS.

During the summer of 2014, Juraboev posted on several Uzbek and Russian social media websites his support for the Islamic State and his oath to Baghdadi. Juraboev also stated that he would shoot and kill Obama if he were directed to by the Islamic State. Following his post about killing the president, FBI agents visited Juraboev at his apartment in Brooklyn where he confirmed the posting as his and reiterated his remarks as truthful and willing to go forward with them at the direction of the Islamic State. Juraboev went on to identify Saidakhmentov as a co-worker of his that has the same ideology.

Throughout the Fall of 2014 Juraboev and Saidakhmetov had several court-authorized electronically recorded conversations about planning their trips to join ISIS in Syria, as well as the possibility of stealing a police officer's gun and shooting everyone at the airport if their attempt to board the plane was stopped. In September 2014, the FBI introduced an informant (hereinafter "CI") that purported to be a native Uzbek. The CI indicated that he would help the two individuals fly to Syria. On December 27, 2014 Juraboev purchased airline tickets to travel from John F. Kennedy Airport to Turkey, departing on March 29, 2015. However, Saidakhmentov still needed his passport application processed, and asked the CI to get one for him by forging his signature and filling out the passport document on his behalf. The CI agreed and was able to expedite the passport process on behalf of Saidakhmentov, but not before Saidakhmentov reached out to Habibov for money to pay for the passport and an assurance that he would pay for his travel and expenses while living in Syria. During another monitored phone call Habibov assured Saidakhmentov that he would take care of all of his expenses. The next week, Habibov went with Saidakhmentov to a travel agency in Brooklyn and bought Saidakhmentov's plane ticket to Turkey.

Prior to Saidakhmentov's expected departure at the end of February, Habibov called two individuals, Dilkhayot Kasimov and Akmal Zakirov asking for donations for both of the "brothers" (Saidakhmentov and Juraboev) as they departed the United States to join the Islamic State. Kasimov and Zakirov agreed to fund the two "brothers" (Saidakhmentov and Juraboev) with donations to help them join ISIS in Syria. This phone call was recorded by the FBI after Saidakhmentov and his associates were placed under surveillance following his social media posts. Saidakhmentov was arrested as he attempted to board his flight at JFK, while Juraboev and Habibov were arrested without incident at their respective apartments in Brooklyn. Kasimov and Zakirov were indicted in June of 2015 for their monetary support of Juraboev and Saidakhmentov.

8. **Name(s):** David "Daoud" Wright, Nicholas Rovinski a/k/a Nuh Amriki, and Usaama Abdullah Rahim (deceased)

**District(s):** District of Massachusetts

**Arrest Date:** Between June 2, 2015 when Rahim was killed by Boston Police and June 15, 2015 when Rovinski and Wright were indicted.

**Procedural Posture:** On June 15, 2015 Wright and Rovinski were indicted. On 6/19/15 the two had initial appearances on the charges. The parties both requested continuances of the detention hearing, with the court agreeing to set the detention hearing(s) at the same time as the initial status conference. Both men have been detained to the custody of the U.S. Marshal. Their next court date is scheduled for July 29, 2015 at 2pm.

**Charges:**

18 U.S.C. § 2339B (a) (1) - Conspiracy to Provide Material Support to a Foreign Terrorist Organization (Wright and Rovinski)

18 U.S.C. § 371–Conspiracy to Obstruct Justice (Wright)

18 U.S.C. § 1519- Obstruction of Justice (Wright)

**Facts:**

Usama Rahim was the uncle of David Wright. Rahim came from a prominent African-American Muslim family that had two imams in it. His father and brother have led Muslim congregations as Imams in several cities across the U.S. His brother was an outspoken critic of the attacks on 9/11 and the Boston Marathon bombing. Wright lived in his south Boston home with his wife and young children prior to his arrest.

Rovinski is a Caucasian male and recent convert to Islam that had befriended both Rahim and Wright online, and began to visit the two men throughout 2014 and 2015. Although the complaint does not specifically mention how the Boston JTTF began to watch the men under surveillance, several media outlets including *The Boston Globe* have cited law enforcement officials that Rahim was on the FBI's radar as far back as 2012 after several trips to Saudi Arabia and following Facebook posts that were critical of the United States and militant in nature. According to the indictment, in May 2015 Wright, Rovinski, and Rahim agreed to kill Pamela Gellar following the "Draw Muhammad" contest in Garland, Texas. Following the contest and subsequent attack by gunmen Nadir Soofi and Elton Simpson, an online post by ISIS was issued. The online post issued a "fatwa" or religious ruling calling for Gellar to be killed.

On May 26, 2015 Rahim purchased 3 military grade knives on Amazon.com for the intended purpose of killing Gellar with one of the knives. The FBI intercepted the packages before they were delivered to Rahim's residence to confirm their contents. On May 31, all three men met for more than two hours on a secluded beach in Rhode Island to discuss their plot against Gellar. The men were under physical surveillance of the FBI after text messages were intercepted between the three of them. The text messages included the scheduling of the meeting following the receipt of Rahim's package.

On the morning of June 2, 2015 Rahim called his nephew to inform him that he could no longer live in this life and "*wanted to meet Allah sooner.*" He indicated to Wright that he was no longer going to go after Gellar, but intended to attack "*the boys in blue*" in Massachusetts. Rahim indicated to Wright that he was going to carry out his attack against police officers either that day or the next. Prior to ending the conversation, Wright told Rahim to destroy his phone and wipe his laptop clean of its contents, so that it could not be searched by law enforcement. He also instructed him to write a will for his children and wife. Two hours after this phone conversation, Rahim was approached by members of the Boston JTTF where he allegedly brandished one of his military knives at officers and was subsequently killed with 3 shots to his torso in the parking lot of a CVS.

Rovinski was under the investigation of the FBI for the past six months following numerous posts, comments, and videos on his Facebook, Twitter, Google+, and YouTube accounts. According to the complaint, for the past two months Rovinski viewed videos about making weapons such as machetes and power tools. On May 29, 2015 Wright and Rovinski had a telephone conversation for over two hours where they praised ISIS, and talked vaguely about their plans which included setting up a meeting on a Rhode Island beach between the three men to finalize the details of their plot against Gellar. Both Wright and Rovinski were arrested following the death of Rahim. Both men told investigators that they supported the acts of ISIS.

9. **Name(s):** Abdul Malik Abdul Kareem a/k/a Decarus Thomas, Elton Francis Simpson (deceased) & Nadir Hamid Soofi (deceased)

**District(s):** District of Arizona

**Arrest Date:** Kareem was arrested and indicted in June of 2015. Simpson and Soofi were killed in Garland, Texas on the night of May 3, 2015.

**Procedural Posture:** Kareem was arrested and indicted on the same day. His detention hearing was held on June 17, 2015 in which he was deemed a flight risk and required to be detained pending trial. A status conference is scheduled for September.

**Charges:**

18 U.S.C. § 371– Conspiracy

18 U.S.C. § 924(b) & 2- Conspiracy of Interstate Transportation of Firearms with Intent to Commit a Felony, Including Murder and Aggravated Assault

18 U.S.C. § 1001(a) (2) - False Statements

**Facts:**

Elton Simpson and Nadir Soofi were roommates in Phoenix, Arizona prior to their attack on the “Draw Muhammad” contest in Garland, Texas on May 3, 2015. The event was held at the Garland convention center and hosted by Pamela Gellar. Gellar is known as one of the most outspoken critics of Islam and has called for the expulsion of all Muslims from the United States.

Soofi was born in Garland, but spent the majority of his life in Arizona. He had a Pakistani father and an American mother. He owned a carpet cleaning business where he would sometimes hire Simpson to work for him. Simpson was an African-American convert to Islam who was convicted in March of 2011 of lying to federal agents about plans to join an Al-Shabab, after attempting to travel to Somalia. Following his conviction he was sentenced to 3 years’ probation and placed on the no-fly list.

Hours before the attack Simpson posted a tweet with the message “*#Texasattack: May Allah accept us as mujahedeen.*” The tweet also said he and Soofi had pledged allegiance to “*Amir al Mu'mineen,*” which means “*the leader of the faithful*”, and is what Baghdadi is referred to by supporters of ISIS.

Abdul Malik Abdul Kareem is a 43 year old African American male who converted to Islam several years ago. According to the indictment, Kareem hosted Soofi and Simpson in his home beginning in January. The three men discussed the attack and practiced shooting firearms in remote desert areas of Arizona in preparation for their attack on the contest. The indictment states that Kareem provided the guns that Soofi and Simpson used in the attack. It is further alleged Kareem lied to FBI agents by telling them that he did not have knowledge of the event, and he did not go shooting in the desert with Soofi or Simpson, when he was interviewed by FBI agents a few days after the attack. During the interview and execution of search warrant, Kareem was found to be in possession of two firearms and a bullet proof vest, both of which were prohibited by his previous convictions.

At his detention hearing FBI special agent McCarthy described how a witness and a confidential informant learned about Kareem's interest in the Islamic State. McCarthy said a 2012 investigation into Kareem determined he had a terrorism training document on his computer. She said he wanted to attack the Super Bowl when it was in Arizona this year, but provided no specifics about how serious he was. She went on to testify that the confidential informant was present with the three men when they shot guns together in remote desert areas throughout Arizona.

**10. Name(s):** Ali Shukri Amin & Reza Niknejad

**District(s):** Eastern District of Virginia

**Arrest Date:** Amin was arrested in February 2015 and charged under seal as a juvenile as he is only 17 years old. On June 11, 2015 the case was unsealed and Amin was charged as an adult under a 1-count information charging him with Conspiracy to Provide Material Support to a Foreign Terrorist Organization: ISIS. Amin plead to the information on the same day (June 11<sup>th</sup>) pursuant to a plea agreement with the USAO. Within the plea agreement, Amin agreed to cooperate with the government. A criminal complaint was filed under seal against Reza Niknejad, following the plea agreement, charging him with conspiracy to provide material support to a foreign terrorist organization, conspiracy to provide material support to terrorists, and conspiracy to kill and injure persons in a foreign country.

**Procedural Posture:** Niknejad was charged in absentia as he has traveled to Syria to join ISIS. Amin is scheduled for sentencing on August 28, 2015 but may have that postponed based on his cooperation agreement.

**Charges:**

18 U.S.C. § 2339 B- Providing Material Support to a Foreign Terrorist Organization (Amin)

18 U.S.C. § 2339 B- Conspiracy to Provide Material Support and resources to a Foreign Terrorist Organization (Niknejad)

18 U.S.C. § 2339 A- Conspiracy to Provide Material Support and Resources to Terrorists (Niknejad)

18 U.S.C. § 956- Conspiracy to Kill and Injure Persons in a Foreign Country (Niknejad)

**Facts:**

Amin was first arrested in late February 2015 under seal, as he was only seventeen (17) at the time of his arrest. He is charged with helping Niknejad travel to Syria to join the Islamic State. Niknejad and Amin are from Prince William County and attended the same high school at one point resulting in their friendship and budding interest with ISIS.

According to Amin's plea agreement and statement of facts, Amin was a junior in high school when he began his radicalization and voicing his support of ISIS. He ran a twitter account, @AmreekiWitness that had over 4,000 followers and issued over 7,000 tweets. The tweets were all in support of ISIS, including links to a personal blog and "Tumblr". His blog and "Tumblr" paged instructed individuals how they could send money to ISIS using the bitcoin program.

Amin began an effort in September 2014 to convert Niknejad to radical Islam, and in late November, he put Niknejad in touch with an Islamic State supporter overseas through an encrypted chat messenger. Niknejad's affidavit states that he converted from Shia Islam to Sunni, which is the official sect of ISIS. Amin put Niknejad in online contact with 5 unindicted co-conspirators, all of whom were living outside of the United States. Amin arranged for the overseas Islamic State supporter to send Niknejad a thumb drive, a letter and a phone he could use during travel. Niknejad bought a plane trip from Dulles International Airport to Greece with a layover in Istanbul, Turkey, and on January 14, Amin and another unindicted co-conspirator gave him a ride to the airport. Niknejad told his family he was going on a camping trip,

according to the plea agreement. Customs and Border Protection records show Nikejad made it to Turkey on January 15 but never boarded the plane to Greece. The next day, an ISIS affiliate told Amin that Niknejad had successfully crossed over into Syria. Amin and the unindicted co-conspirator delivered a letter and thumb drive to his family members in which Niknejad indicated he did not plan to see them again and had joined ISIS.

Niknejad was born in Tehran, Iran on March 7, 1996. In 2002 he became a naturalized U.S. citizen. He is currently believed to be in Syria and a member of ISIS. On January 19, 2015 his family reported him missing to the Prince William County Police Department. According to his affidavit in support of complaint, Amin had put Niknejad in contact with ISIS facilitators in Turkey and Syria. These facilitators used secured online platforms and encrypted chats to discuss Niknejad's travel plans and move to Syria. On February 4, 2015 Niknejad called his mother at their residence in Virginia. He told her that he was being treated well in the Islamic State and that he was going to fight against those who oppress Muslims. He bid her a final farewell and told her that he would see her in paradise.

11. **Name(s):** Leon Nathan Davis III a/k/a Abdul Wakil Al Amreeke

**District(s):** Southern District of Georgia

**Arrest Date:** On November 24, 2014 Davis was arrested at the Delta check-in station at the Hartsfield-Jackson Atlanta International Airport on a parole violation for attempting to leave the state and possession of firearms.

**Procedural Posture:** Davis has been held on the parole violation since his arrest. He was indicted on one count of Possession of firearms by a convicted felon in February of 2015. On May 27, 2015 a one-count information was filed against him charging him with attempt to provide material support to a designated foreign terror organization. He waived indictment and reached a plea agreement with the USAO where he plead to the indictment (material support), with the other charge being dismissed. On July 28, 2015 Davis was sentenced to fifteen years in prison with lifetime post-release supervision.

**Charges:**

18 U.S.C. § 922 (g) (1) - Possession of Firearm by a Convicted Felon

18 U.S.C. § 2339 B- Attempt to Provide Material Support to a Foreign Terrorist Organization

**Facts:**

Leon Nathan Davis III is a 37 year-old Caucasian male from Atlanta, Georgia. Davis spent the majority of his life in Georgia and has been in and out of prison for the past 20 years. In October 2005 he was sentenced to 10 years in prison for cocaine trafficking. He was released in the fall of 2008, but returned back to prison in 2012 for 11 months, due to a parole violation.

The majority of Davis' case has remained under seal and not highly publicized in the media. Following his plea, FBI agents indicated to the press that Davis had been under surveillance by their office and the Georgia Board of Pardons and Parole for a little over a year following Facebook posts exhibiting extremist ideology and support for ISIS. Davis has a wife that he has been married to for over two years, a daughter, and was working as a mail-order medical supplements salesman at the time of his arrest.

On November 23, 2014 Davis purchased a one-way ticket from Atlanta to Istanbul, Turkey. FBI agents stated that Davis admitted in a post-arrest interview that he intended to travel from Turkey to Syria to join ISIS. He went on to say that he hoped to work as an interpreter for ISIS or a recruiter of westerners to join ISIS. According to his initial indictment on the weapons charge, Davis is accused of having 7 different guns in his household including shotguns, a Mossberg rifle, and several .45 caliber pistols.

12. **Name(s):** Asher Abid Khan

**District(s):** Southern District of Texas

**Arrest Date:** May 25, 2015

**Procedural Posture:** Khan is out on a \$250,000 bond which his father posted. He was indicted on May 27, 2015 on two counts of material support. A continuance was granted until November of 2015 for a status conference regarding discovery materials.

**Charges:**

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

18 U.S.C. § 2339 B- Attempt to Provide Material Support to a Foreign Terrorist Organization

**Facts:**

Khan is a 20 year-old of Pakistani descent who grew up in a wealthy family. His family lives outside of Houston, Texas. Khan graduated high school in 2013 and shortly thereafter moved to Australia to live with his aunt and uncle in hopes of enrolling in college and medical school. During his high school years, Khan befriended Abdullah Ali who was in the same grade as him. Ali is a Muslim convert of Mexican-American descent. The two remained in close contact with one another following graduation and attended the same mosque.

Khan's complaint states that Ali was under the surveillance of the FBI for a year. The two began to exchange Facebook messages pertaining to joining ISIS with the hopes that Khan could help facilitate Ali's travel. Khan got in touch with an individual who is believed to be an ISIS facilitator living in Turkey. The unindicted co-conspirator (CC1) began contacting Khan and Ali on a regular basis, keeping in touch with the boys to make sure they were still going through with their plans to join ISIS.

At the end of 2014, both Khan and Ali had purchased tickets to arrive in Turkey at the same time. The two of them were to make their way to the southern border with CC1, in hopes of entering into Syria. Throughout this entire time, Khan remained in close contact with his high school girlfriend, informing her of his plans to move to Syria and join ISIS. Khan's girlfriend begged him not to go and warned him that she would tell his parents.

Khan and Ali made their way to Turkey in February of 2014. Khan remained in contact with his girlfriend throughout the entire time by sending her text messages and Facebook messages. His girlfriend informed his parents of Khan's whereabouts prior to him attempting to enter Syria. Khan's family began to message him on Facebook informing him that his mother was deathly ill and he needed to return back to the United States before she passed away. In all actuality, his mother's health was fine and the family made up the story to get Khan to come back home. Under the guise that his mother was dying, Khan left Ali in Turkey and flew back to Texas immediately.

Ali came in contact with CC1 and entered into Syria successfully. Khan remained in contact with Ali when he returned back to Texas to inquire about his well-being and whereabouts. In several Facebook messages Ali confirmed that he had made it into Syria with

the help of CC1, and was now in a training camp where he was given an AK-47 rifle and training with members of ISIS. Khan replied to the messages and sent him warm wishes along with his aspirations of hoping to re-join him in Syria. Khan was arrested soon after in May of 2015 after continuing to contact Ali online. Ali remains at-large and has not been indicted or criminally charged as of June 2015.

**13. Name(s):** Bilal Abood

**District(s):** Northern District of Texas- Dallas Division

**Arrest Date:** May 2015

**Procedural Posture:** On May 15, 2015 Abood was ordered to be detained following a detention hearing. He was indicted on June 10, 2015 to one count of False Statement to a Federal Agency. The case is set for Jury Trial on August 17, 2015. Pretrial Motions must be filed by July 15, 2015 with responses by the government due by July 29, 2015.

**Charges:**

18 U.S.C. § 1001- False Statement to a Federal Agency

**Facts:**

Abood is a 37 year-old naturalized American citizen originally from Iraq. When living in Iraq, Abood worked as a translator for U.S. armed forces and migrated to the United States in 2007. He was living in Mesquite, Texas at the time with his fiancé, who is of Mexican descent and her young daughter. By all media accounts and first-hand witnesses, Abood was beloved by his neighbors and his fiancé's family.

According to his indictment, on March 29, 2013, Abood attempted to depart the US from Dallas Fort Worth International Airport. At the airport FBI agents interviewed Abood and asked about his travel plans. Abood told agents he was going to Iraq to visit family, but was ultimately not allowed to board his flight by agents. On April 4, 2013 he was interviewed by the FBI again in which he was asked if he was intending to go to Syria to fight. Abood admitted that his intent on March 29, 2013 was to ultimately go to Syria to fight Assad's regime, but that he wanted to join the Free Syrian Army (FSA), not the foreign terrorist organizations designated by the State Department.

On April 17, 2013 the FBI confirmed that Abood was in San Antonio, Texas attempting to enter Mexico and then fly to Iraq. A confidential human source (CHS#1) reports to the FBI that Abood had been watching Pro-ISIS and Al-Qaeda videos on social media prior to his attempted departure. Abood enters Mexico on April 29 and boards a flight to Turkey. After arriving in Turkey Abood enters Syria through the southern border.

On September 16, 2013 Abood returns to the United States where he is met by FBI agents and interviewed. Abood admits to entering into Syria from Turkey, but claimed to fight with the FSA. Abood claims that the Free Syrian Army and Jabhat Al-Nusra fight together on the battlefield, but due to a lack of action on the ground he grew frustrated and returned back home.

A search warrant is executed on Abood's computer on July 9, 2014. The results of the search showed that Abood pledged an oath to Baghdadi on his Twitter account, and viewed many of the ISIS beheading videos. On April 14, 2015 FBI agents went to Abood's home in Texas to return his computer that was seized in the 2014 search warrant. During the exchange, Abood admitted to the agents that he knew it was a crime to lie to a FBI agent, and Abood denied that he had ever pledged allegiance to Baghdadi. An arrest warrant was issued against Abood on May 5, 2015.

**Name(s):** Nader Elhuzayel & Muhanad Badawi

**District(s):** Central District of California

**Arrest Date:** May 2015

**Procedural Posture:** Elhuzayel and Badawi were indicted on June 3, 2015 on a three-count indictment. Both have been remanded into custody since their arrests in May. A discovery status conference has been scheduled for them both on July 27, 2015.

**Charges:**

18 U.S.C. § 2339 B- Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization (Elhuzayel & Badawi)

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

18 U.S.C. §§ 2339 B, 2- Aiding and Abetting Another to Attempt to provide Material Support to a Foreign Terrorist Organization (Badawi)

**Facts:**

Nader Elhuzayel and Muhanad Badawi are both 24-year-old Palestinian-Americans that reside in Anaheim, California. They have been lifelong friends and other media reports have stated that they may also be cousins. According to the indictment and complaint, Elhuzayel maintained at least fifteen (15) twitter accounts while Badawi had about four (4.) Elhuzayel had such a large number of twitter accounts due to constantly being locked out of his account by Twitter moderators because of his pro-ISIS tweets. Elhuzayel sent several tweets to Elton Simpson, prior to and after his attack on the “Draw Muhammad” contest in Garland, Texas. In one of Elhuzayel’s tweets he called Simpson a martyr and asked for “*the brothers to pray that he enter the highest levels of heaven as a martyr.*” Elhuzayel and Badawi sent several Facebook messages to one another and posted on each other’s timelines pro-ISIS videos and videos purporting to claim that ISIS would soon reach into Palestine to wipe out all the Jews.

Their phone conversations began to be recorded in May of 2015, with the majority of those conversations consisting of talks to join ISIS and asking one another where in the Middle East they would like to fight. The two decided that it would be best if they joined ISIS in Egypt, since they would be able to cross into Egypt from the border with Israel. On May 7, 2015 law enforcement officials observed Badawi and Elhuzayel sitting in Badawi’s vehicle. Badawi purchased Elhuzayel a one-way ticket from LAX to Tel Aviv to go forward with his plan of joining ISIS. The flight was scheduled to leave LAX on May 21, 2015 and arrive in Tel Aviv the next day. In several phone conversations after the ticket purchase, Elhuzayel and Badawi indicated that they would both be fasting for Ramadan in the Islamic State as opposed to in the United States.

In March of 2015 Elhuzayel was introduced to a woman online. The woman was living in Palestine, and the family hoped the two would marry. The two messaged each other on a daily basis following the initial online meeting and both agreed that they were pro-ISIS. The woman and Elhuzayel both exchanged pro-ISIS links and videos to one another and vowed that they would live together and raise a family in the Islamic State.

In a recorded conversation on May 16, 2015 between Badawi and another man listed as MALE #1 (M1) Badawi confirms that Elhuzayel is traveling to Palestine at the end of the month but will soon be going to “meet up with the Islamic State” in hopes of joining their ranks. Badawi and Elhuzayel were both arrested on May 21, 2015, the day Elhuzayel was scheduled to fly out of LAX to Tel Aviv. Elhuzayel was arrested at the airport as he was checking-in to his flight while Badawi was arrested at his home. Both men waived Miranda and both gave statements admitting their actions to FBI agents.

14. **Name(s):** Miguel Diaz a/k/a Aziz Al Hariri

**District:** Southern District of Florida

**Arrest Date:** April 2015

**Procedural Posture:** Diaz pled to the indictment on May 29, 2015 and was sentenced to 120 months incarceration and 3 years post-release supervision by Judge Joan Lenard on July 28, 2015.

**Charges:**

18 U.S.C. 922 (g) (1) - Felon in Possession of a Firearm

**Facts:** According to the Complaint agents from the FBI started their investigation into Miguel in early January 2015. His Facebook page revealed "numerous postings of “ISIS related materials” as well as a recent posting showing Diaz posing with a firearm." Diaz used the alias “Aziz Al Hariri” on his Facebook account.

On January 25, 2015 a confidential human source (CHS) met with Diaz at a restaurant in Broward County. The two discussed guns, and the fact that Diaz was a felon and cannot purchase guns legally. Nonetheless, Diaz indicated to the CHS that he should buy him guns and falsely claim that they were stolen in exchange for \$500 dollars. Diaz wanted the CHS to get him a "baby glock". Diaz also tells the CHS that he already has a Kel-Tec 2000 sniper rifle with a collapsible stock that was perfect because "he could fold it up, put it in a backpack, and take it into a stadium undetected." Diaz further explains that he is also in possession of a Springfield XTM handgun, and another gun which Diaz proudly shows the CHS, located in a backpack in Diaz' vehicle.

On February 8, 2015, Diaz and the CHS go on a trip to the Everglades for the purpose of shooting guns. The CHS records Diaz (at the request of Diaz) on his iPhone shooting his Springfield XTM handgun and Kel-Tec 2000 sniper rifle at cans. On March 20, 2015 CHS and Diaz have a recorded conversation where Diaz affirmatively answers the CHS question of whether he wanted him to buy more ammunition. Diaz tells the informant that he would purchase an additional 500 rounds from the CHS if "*the price was good*". On April 2, 2015 a search warrant was issued on Diaz' residence and vehicle. The warrant was executed the same day, and Diaz is later arrested in his car with a Springfield XDM in his waistband, and a .40 caliber handgun magazine in his pocket. FBI agents execute the warrant of his house and find the Kel-tec sniper rifle and approximately 200 to 300 rounds of ammunition. Diaz is booked at the FBI Miami Field Office on April 2nd, 2015.

**15. Name(s):** Hamza Naj Ahmed, Mohamed Abdihamid Farah, Adnan Abdihamid Farah, Abdurahman Yasin Daud, Zacharia Yusuf Abdurahman, Hanad Mustofe Musse & Guled Ali Omar

**District:** District of Minnesota

**Arrest Date:** April 2015

**Procedural Posture:** Detention hearings and bail proposals were rejected by the judge in this case on July 8, 2015. A September status conference has been scheduled to reconsider the boys' release and to provide a reasonable time for an update on discovery status.

**Charges:**

18 U.S.C. § 2339 B (a)(1)- Conspiracy to Provide Material Support to a Foreign Terrorist Organization (Hamza Naj Ahmed, Mohamed Abdihamid Farah, Adnan Abdihamid Farah, Abdurahman Yasin Daud, Zacharia Yusuf Abdurahman, Hanad Mustofe Musse& Guled Ali Omar)

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

18 U.S.C. § 2339B (a) (1) - Attempt to Provide Material Support to a Foreign Terrorist Organization (Hamza Naj Ahmed, Mohamed Abdihamid Farah, Zacharia Yusuf Abdurahman & Hanad Mustofe Musse)

18 U.S.C. § 2339B (a) (1) - Attempt to Provide Material Support to a Foreign Terrorist Organization (Mohamed Abdihamid Farah & Abdurahman Yasin Daud)

18 U.S.C. § 1001 – False Statement (Hamza Naj Ahmed)

18 U.S.C. § 1001 – False Statement (Mohamed Abdihamid Farah)

20 U.S.C. § 1097(a) - Financial Aid Fraud (Hamza Naj Ahmed & Hanad Mustofe Musse)

**Facts:**

According to the complaint, the FBI conducted a ten (10) month investigation into groups of young men who have tried and in some cases successfully attempted to join ISIS in Syria. All the individuals listed within the indictment and complaint are friends between the ages of 18 and 20. The majority of them went to the same high school in northern Minneapolis. They are all naturalized U.S. citizens, either born in Mogadishu, Somalia or refugee camps in Kenya, Ethiopia, and Sudan.

The complaint states that Abdi Nur, who was charged in absentia, along with Abdullahi Yusuf in March of 2015, has recruited the named individuals and provided assistance to them in their attempts to leave the country and join ISIS. During the course of the FBI's surveillance of the boys, they first observed Mohamed Farah (M.FARAH) with Abdullahi Yusuf days before his (Yusuf's) attempted travel to Syria. The boys were seen together at a local Macy's store purchasing items for Yusuf's trip. On May 28, 2014 a police report shows that Abdi Nur and Abdurahman Daud (DAUD) were involved in a minor accident together. An investigation into Nur's whereabouts by the FBI following the accident, revealed that he left the country the night a mere hours after his car accident. Airline records showed that Nur boarded a flight from St. Paul to Istanbul. Abdi Nur's sister also began to ask the boys about his whereabouts and went to a local mosque in Bloomington, Minnesota to question the Farah brothers about her brother's disappearance. Both A. FARAH and M. FARAH told her that they could not tell her where he was because they would not be safe if she knew. They also told her that the ISIS facilitators do not tell the boys when they are leaving the country, they just pay for their tickets and tell them to show up at the airport with only a few days' notice.

At this point the FBI began a physical surveillance escort of the boys who were affiliated with Nur. An FBI analysis of A. FARAH's Facebook showed many pictures of Anwar Al-

Awlaki along with posts asking Muslims to commit jihad in defense of the religion. On April 25, 2014 A. FARAH applied for a passport and listed China as his destination with a departure date of May 30, 2014. The FBI also introduced an informant (a friend of the boys) to gain more information about them and to help mold their next alleged “plot.” A confidential human source informed the FBI that Guled Ali Omar (OMAR) and the CHS attempted to leave the US to join ISIS in late May of 2014 but were unsuccessful. The CHS informed the FBI to gain leniency on his charges and has cooperated with the FBI for the past two years. The informant alleges OMAR withdrew \$5,000 in cash from his federal financial aid debit card to help fund his travel plans into Syria. He also informs the FBI that other members of the group are also funding their trips by using their financial aid returns. OMAR attempted to join ISIS with the informant, but was confronted by family members forcing him not to leave. OMAR and his attorneys claim that he abandoned any future plans to travel to Syria following his family’s attempt to stop him the year prior.

On November 7, 2014 three of the boys attempted to enter Syria by flying out of John Kennedy International Airport in New York. The remaining boys attempted to fly out of San Diego. The boys took Greyhound buses together to their respective locations of New York or San Diego. Each member was then scheduled to take a separate flight to Europe, and then take a bus from their respective locations in Europe to Istanbul. Once they all arrived in Istanbul they would meet with ISIS facilitators, with the hopes of entering Syria through Turkey’s southern border. All the boys were questioned when they arrived at their respective airports either in New York or San Diego and all claimed 1) not to know each other and 2) that they were traveling to Europe for vacation purposes. They were all denied boarding and forced to head back to Minneapolis.

Following the return back to Minneapolis, the FBI used the CHS to attempt to have the boys attempt to go to Syria another time. The CHS had all six (6) individuals meet together at certain times to discuss their travel plans and how they would be able to fly overseas without detection. During the spring of 2015, all six (6) members of the group were recorded in conversations with the CHS, admitting their lies to FBI agents about not knowing each other, as well as having other friends lie on their behalf in order to avoid law enforcement and their suspicious families. The CHS also had the boys admit they remain in contact with Abdi Nur who joined ISIS in Syria. Nur told the boys he had contacts in Mexico that would be able to help him

travel to Turkey by way of Mexico. The CHS informed the boys that he had a contact that would be able to supply them with fake passports, so long as they provided photographs to him for the use in procuring the passports. The individuals provided the photographs to the CHS in the spring of 2015. The boys planned to drive to San Diego, enter Mexico, and then meet with facilitators of Abdi Nur's to fly overseas. On April 17, 2015 the CHS, M.FARAH, and DAUD left Minneapolis in Daud's vehicle and drove to San Diego. The FBI arrested the boys when they arrived in San Diego. The remaining members of the indictment were arrested in their respective homes in Minneapolis.

**16. Name(s):** Mohamad Saeed Kodaimati

**District:** Southern District of California

**Arrest Date:** April 2015

**Procedural Posture:** Kodaimati was indicted on May 15, 2015. He has remained in custody since his arrest. On June 26, 2015 a joint request for continuance was granted. Next court date is 8/3/2015 for status conference regarding discovery.

**Charges:**

18 U.S.C. § 1001(a) (2) - False Statements Involving International Terrorism

18 U.S.C. § 1001(a) (2) - False Statements Involving International Terrorism

**Facts:** Mohamad Kodaimati is a U.S. citizen originally from Aleppo, Syria. The 24 year-old Syrian male became a citizen in 2008 and spent the majority of the past fifteen (15) years in the United States.

The complaint alleges that on March 10, 2015 and March 11, 2015 at the U.S. embassy in Ankara, Turkey, Kodaimati knowingly made false and fictitious statements to the FBI and the Department of State's Diplomatic Security when Kodaimati was questioned. It alleges that he lied about relationships with various terrorist organizations and individuals while he was living in Kafr Hama, Syria with his family in 2013 and 2014.

Kodaimati lived in Turkey and Syria the past two years. On December 24, 2012 he left San Diego to travel to Istanbul, Turkey. He then attempted to return back to his parents' home in San Diego during the spring of 2015. On March 5, 2015 Kodaimati told American Citizen

Services at the U.S. embassy in Turkey that he had been in Syria and Turkey since 2012. He stated that he was arrested in Turkey in 2013 and deported to Syria approximately one month later. Since then, he claimed to have lived in Kafr Hama where his family owns property.

On March 5, 2015 Kodaimati attempted to fly from Istanbul to San Diego. He was denied boarding and told by Turkish officials to call the U.S. Embassy. On March 10, 2015 Kodaimati went to the Embassy where he was interviewed by two FBI Special Agents. During the course of the interview Kodaimati denied that he ever worked or volunteered at a Sharia Court. Sharia Courts were established by ISIS in Syria to govern areas they took over after defeating the Syrian- government troops. He claimed that he only went there once to help a woman who had her property stolen. He also claimed to not know or associate with anyone from ISIS or Al-Nusra Front. He claimed to own an AK-47 rifle but never engaged in any fighting or ever being involved in combat. On March 11, 2015 Kodaimati returned to the embassy and denied any affiliation with a man identified as A.S. On March 20<sup>th</sup> and March 25<sup>th</sup> Kodaimati was interviewed by FBI Agents in the United States after being allowed to travel back to the country.

According to the complaint, Mohamad Kodaimati was a facilitator and held an official position with the Sharia Court established by members of ISIS and Nusra Front in lands they possessed from the Syrian government. Within those courts, Sharia law would be enforced through a judicial governance headed by factions of ISIS and the Nusra Front. Through search warrants of his Facebook page, the FBI was able to find messages where Kodaimati tells friends online that he is a facilitator and mediator between ISIS and other factions within Syria. He also claims to be a media relations facilitator for the Sharia Court. FBI Agents were also able to retrieve photographs of Kodaimati with confirmed members of ISIS who were convicted of terrorism in other countries throughout Europe. Other pictures and Facebook messages show that Kodaimati was also involved in battles as a member of the Nusra front including a raid on a jail that released many members of ISIS and the Nusra Front.

On April 22, 2015 Kodaimati spoke with agents again at his home in San Diego where he admitted his role at the Sharia Court, his involvement with foreign terrorist organizations, and his combat experience while in Syria. He stated he was paid by the Sharia Court for his work, he actively participated in battles, and clarified his role as a mediator between Al-Nusra and ISIS. At the conclusion of the interview Mohamad was arrested for making false statements involving international terrorism.

17. **Name(s):** John T. Booker & Alexander Blair

**District:** United States District Court-District of Kansas

**Arrest Date:** April 10, 2015

**Procedural Posture:** Booker was indicted on April 16<sup>th</sup> on a three count indictment. He waived his detention hearing with a status conference scheduled for August 19, 2015. Blair was indicted on the same day but released to pre-trial release pending his trial. Blair's status conference is scheduled for December 7, 2015 with a jury trial scheduled for January 12, 2016.

**Charges:**

18 U.S.C. § 2332a (a) (3) – Attempt to Use a Weapon of Mass Destruction (Booker)

18 U.S.C. § 844 (f) (1) – Attempt to Destroy property of the United States (Booker)

18 U.S.C. § 2339A (b) – Attempt to Provide Material Support to a Foreign Terrorist Organization (Booker)

18 U.S.C. § 2, 371 – Conspiracy to Damage Property of the United States (Blair)

**Facts:** John T. Booker is a 20 year-old African-American male from Topeka, Kansas. In February 2014, Booker had been recruited by the United States Army and was scheduled to report for Basic Training at the end of April.

According to the complaint, on March 15, 2014 Booker posted on his Facebook account that he wanted to “wage jihad and hope to die for the sake of Allah.” A citizen's complaint was sent to the FBI following the post. FBI agents interviewed him about the Facebook post on March 20<sup>th</sup>. Booker admitted that he enlisted in the Army with the intent to commit an insider attack. He went on to say that if he went overseas “*he would rather turn around and shoot the person giving orders than kill a Muslim.*” Shockingly, Booker was not arrested following the interview, but rather, he was denied entry into the military.

In October 2014, the FBI introduced two Confidential Human Sources (CHS 1 & CHS2) who purported to be Islamic jihadists. The informants wanted to enlist Booker into their plan to bomb a military base in Fort Riley, Kansas. CHS1 purported to tell Booker that CHS2 was a rich sheikh that would help them plan their attack by funding the purchasing of materials for a bomb

they would set off at the military base. Booker was ecstatic about this information and exclaimed that he wanted to be “*the one to press the button for the bomb to go off.*”

CHS1 and CHS2 met with Booker to start purchasing the materials for a bomb, but told him to rent a storage unit at a local warehouse so they could store the materials there. Booker approved of this idea, and according to Blair’s complaint, was able to borrow money from Blair to rent the space out. Blair’s complaint goes on to state that Booker made him aware of why he was renting out space at the warehouse. Once the warehouse was rented, CHS1 and Booker went to a local stores to buy materials they thought they would need to build a bomb.

According to the complaint, Booker taped a jihadist video where he pledges allegiance to Baghdadi and ISIS inside the storage unit. The video shows Booker claiming that he is a member of ISIS. Booker believed that the two were building a “Vehicle Borne Improvised Explosive Device.” On April 10, 2015 Booker and the CHS drove to Fort Riley and placed the explosive device next to an entrance of the base. While Booker was making what he believed to be the final wiring connections to “arm” the device he was arrested and taken into custody without incident by the FBI.

18. **Name(s):** Joshua Ray Van Haften

**District:** Western District of Wisconsin

**Arrest Date:** April 8, 2015

**Procedural Posture:** Joshua was indicted on April 23, 2015 on one-count of Attempt to Provide Material Support to a Foreign Terrorist Organization. He was ordered to be held pending trial. The next status conference is scheduled for 9/23/2015 with Jury Selection and Trial scheduled for 12/7/2015.

**Charges:**

18 U.S.C. § 2339 (A) – Attempt to Provide Material Support to a Foreign Terrorist Organization

**Facts:**

Joshua Van Haften is a 34 year-old Caucasian male from Wisconsin. It is not confirmed when he converted to Islam, but friends believe it was within the past decade. He was convicted

of Second Degree Sexual Assault of a Child in 1999 as well as Aggravated Battery in 1998. Van Haften was also charged with intentionally pointing a firearm at a person in 1999.

According to the FBI Van Haften told a “Person 1”, a former associate of Van Haften’s, he wanted to travel to Syria and Libya to join ISIS. On July 16, 2014 Person 1 informed the FBI field office in Madison, Wisconsin about this information as well as letting them know that Van Haften previously lived in Egypt between 2011 and 2013. Van Haften was arrested in Egypt when he was allegedly caught taking pictures of a military facility. A local woman reported Van Haften’s actions to the Egyptian authorities. Taking pictures of military facilities is a crime in Egypt. Van Haften was detained and deported once Egyptian officials were informed that Van Haften was a sex offender.

On August 29, 2014 a “Person 2” reported a “suspicious and crazed man” who accosted her and her 11 year-old son while she was near the Capitol building in Madison. According to Person 2 a person later identified as Van Haften, talked to her son about starting World War III, and Van Haften’s hopes to travel to Syria to join the war. Following this event, FBI agents attempted to find Van Haften at his last known address. A former roommate let agents know that Van Haften had left to Turkey approximately a week ago. The roommate also indicated that Van Haften made many comments about jihad.

Agents confirmed that Van Haften boarded a flight to Turkey on August 26, 2014 with a return flight of November 24, 2014. After interviewing several of Van Haften’s friends and viewing his Facebook page, the agents saw many of Van Haften’s posts which were pro-ISIS and Jabhat al-Nusra. Van Haften told many of his friends that he supported jihad. Van Haften was also a member of several Facebook groups that admired Baghdadi and ISIS. He also messaged several of his friends in America on Facebook letting them know that he had made it to Turkey and was attempting to enter Syria to join ISIS or Jabhat al-Nusra, but was having difficulty getting across the border and also running low on money. He claimed that many people had lied to him and stole his money while he was in Turkey. After unsuccessfully trying to enter Syria and join a militant organization, Van Haften was eventually detained by Turkish National Police on October 27, 2014. On April 8, 2015 he was returned back to the United States where he was arrested on sight and has been held since.

19. **Name(s):** Keonna Thomas a/k/a Fatayat Al Khilafah a/k/a YoungLioness

**District:** Eastern District of Pennsylvania

**Arrest Date:** April 3, 2015

**Procedural Posture:** Keonna was indicted on April 23, 2015 to one count of material support. A preliminary hearing was held and remains sealed in the record, although probable cause was found. Thomas has remained in custody since her arrest in early April. Her next scheduled court date is for status on August 19, 2015.

**Charges:**

18 U.S.C. § 2339 (A) – Attempt to Provide Material Support to a Foreign Terrorist Organization

**Facts:**

Keonna Thomas is an African-American Muslim woman from Philadelphia, Pennsylvania. She is 30 years-old and lived with her nine (9) and seven (7) year old daughters, her mother, a brother, and grandmother in North Philadelphia prior to her arrest.

According to the complaint, Keonna maintained a twitter account, @YoungLioness, starting in late 2013. The complaint and affidavit is limited in details, but Keonna constantly tweeted in support of ISIS and ISIS fighters. She was in contact with online informants that recorded conversations with her in which she said she hoped to join ISIS in Syria. Keonna also “direct-messaged” two alleged ISIS fighters, a Somali male who alleged to be in Syria and another who alleged to be in Yemen. Her direct messages were in admiration of the two as they were committing “jihad” and her wishes to join them in the Dawla.

On February 17, 2015 Thomas told one of the fighters that she wants to commit a “martyrdom operation” with him. The conversations were often times flirtatious in nature and seemed to be more of a budding romance than militant centered. Thomas indicated that she was attempting to join him in Syria and would do her best to meet him soon.

On March 23, 2015 Thomas purchased an electronic Visa in her own name to allow her entrance into Turkey. The next day, she looked up travel routes from Turkey into Syria. On March 26, Thomas purchased plane tickets from Philadelphia to Istanbul. She had hoped to fly into Istanbul and then enter Syria. A search warrant was executed against Thomas on April 1, 2015. She was arrested following the execution of the search.

20. **Name(s):** Noelle Velentzas & Asia Siddiqui a/k/a “Najma Samma” and “Murdiyyah”

**District:** Eastern District of New York

**Arrest Date:** April 2, 2015

**Procedural Posture:** Indictment filed against defendants on 4/30/2015. Both Velentzas and Siddiqui were ordered to be detained pending trial. Status Conference was held on 6/25/15 with another scheduled for 7/30/2015 to discuss the status of discovery.

**Charges:**

18 U.S.C. § 2332 (A) (a) (2) – Conspiracy to Use a Weapon of Mass Destruction

18 U.S.C. § 842 (p) (2) (A) – Teaching and Distributing Information Pertaining to the Making and Use of an Explosive, Destructive Device, and Weapon of Mass Destruction

18 U.S.C. § 1001 (a) (2) – Material False Statements (Siddiqui)

**Facts:**

Noelle Velentzas (NV) and Asia Siddiqui (AS) were best friends living in Queens, NY. They attended York College together and media reports have indicated that they were also enrolled in post-graduate classes as well. Both were married and had young children. Siddiqui was born in Saudi Arabia but moved to the United States at a young age while Velentzas was of Hispanic descent but converted to Islam during her teenage years.

Siddiqui was a friend of Samir Khan’s in high school and remained friends with him until his eventual death in Yemen in 2010. Khan was a media spokesperson for Al Qaeda in the Arabian Peninsula (AQAP) and was killed by a U.S. drone strike. In 2006 Siddiqui penned and published a poem in one of Khan’s Jihadi Publications. In her poem she states that she wishes to wage jihad and discusses the use of turpentine bombs and gunshots *to “wipe countries of idolatry.”* In 2010, Siddiqui penned a letter to Mohammad Mohamud while he was incarcerated. Mohamud attempted to set off a bomb outside the Portland, Oregon Christmas tree lighting. The letter stated that Mohamud was not *“forgotten in the Ummah’s efforts and prayers.”*

On July 10, 2014 Siddiqui was questioned by FBI agents about her poem and letter, after returning to LaGuardia Airport following a family trip. During the interrogation, Siddiqui denied knowing or having any contact with Khan, and denied contributing to or being published in any jihadist magazines.

Following the interview in July of 2014, the FBI introduced an Undercover Employee (UCE) to befriend NV and AS. The UCE purported to be a Muslim female of south-east Asian descent. According to AS' husband she pretended to be a classmate of theirs and would come over every Sunday to do homework together. Between July 2014 and April 2015, the UCE made regular contact with NV and AS on a daily basis via text message and personal meetings. The UCE also purported to be looking for a husband and sought the advice and help of the two to find one.

Both NV and AS were recorded during all meetings together with UCE. These recorded conversations included the both of them indicating admiration for individuals such as Osama Bin Laden and Abdullah Azzam. The three women devised a plot where they would study chemistry books in order to prepare a homemade bomb to set off in New York City. AS claimed to have downloaded several books to help prepare for the plot including the "Anarchist's Cook Book" and other Jihadi publications distributed by Al-Qaeda.

In other recordings the women wondered why people were going overseas to try and fight for ISIS when they should be doing it here in the United States. The three of them would also discuss pressure cooker bombs with NV often saying she was obsessed with the idea of it, and would mention how she would always see pressure cookers for sale anytime she would go to a department store. The UCE would come over and provide the two with the latest editions of *Inspire Magazine*, the Al Qaeda publication so that they could "study" it together. One particular article that the UC stressed for them to study and memorize, was an exposé on how to create a car bomb. During another meeting the three discussed potential targets for a bomb with NV complimenting the UC for pointing out that 25,000 police officers were in attendance of a funeral for the slain NYPD officers in Brooklyn. During the early months of 2015 the three women would make weekly trips to Home Depot to purchase materials in preparation for their supposed bomb. This included purchases of manure, grass fertilizer, and propane tanks. AS and NV were arrested without incident at their respective residences in April 2015, as they inched closer to constructing an explosive device.

21. **Name(s):** Hasan Edmonds & Jonas Edmonds

**District:** Northern District of Illinois

**Arrest Date:** March 25, 2015

**Procedural Posture:** Indictment filed against defendants on April 2, 2015 charging them with conspiracy to provide material support to a foreign terrorist organization. Status hearing held on July 1, 2015. Jonas Edmonds refused to appear, with counsel making an impromptu waiver of his appearance. The judge admonished Edmonds' for refusing to appear and asked that prosecutors levy a body order for his next court date. Next status conference next scheduled for 9/9/15.

**Charges:**

18 U.S.C. § 2339 (A) – Conspiracy to Provide Material Support to a Foreign Terrorist Organization

**Facts:**

According to the complaint, Hasan and Jonas Edmonds are first-cousins. They are African-American males born in the United States to a family of Muslim converts. Hasan is a 22 year-old member of the U.S. National Guard. He also has an Illinois pistol permit. Jonas Marcel Edmonds is 29 years-old. He resides in Aurora, Illinois. Jonas has a prior felony conviction in the state of Georgia from 2005 which he was incarcerated for.

According to the complaint, the FBI utilized two undercover employees (UC1 & UC2) to lure Hasan and Jonas into their plot. As Hasan was in the armed forces, and did not have a criminal record, he was assisted in traveling from Midway Airport (Chicago) to Egypt in hopes of joining the Islamic State in Libya. UC1 sent Hasan a friend request on Facebook on January 19, 2015. The two exchanged Facebook messages regarding Hasan's eagerness to join ISIS. The two exchanged emails and began to meet in person from January until March of 2015. During one meeting Hasan indicated that if ISIS leaders requested he conduct an attack in the United States he would comply with their orders. Hasan introduces his cousin Jonas to UC1 as he has told him he would be able to help his cousin obtain a passport for the purposes of traveling to the Middle East to join ISIS.

Jonas also makes contact with UC2 online and begins to contact him via online messages including email, Facebook messages, and an instant messenger program. UC2 and Jonas meet several times in person to discuss the cost of airline tickets to the Middle East, as well as conducting a plan for Jonas to conduct an attack on the National Guard base that Hasan works at. Jonas introduces Hasan to UC2 who requests that Hasan retrieve a map of the National Guard Base for the purposes of setting up the alleged attack that Jonas would conduct.

On March 13, Hasan purchases a round-trip ticket from Chicago to Cairo for the purposes of joining the Islamic State. The next day UC1 informs Hasan that he will leave Egypt to join an ISIS cell in Derna, Libya. Hasan would then train battalions of ISIS fighters as he is already well versed in army combat. During a March 23, 2015 meeting between the Edmonds' cousins and UC2, Hasan not only pledges to get a map of the base, but would also provide information about the highest ranking officials on the base. On March 24, 2015 Hasan entered the military installation and retrieved a map, and a schedule of activities on the base, which he gave to Jonas and the UCE. On March 25, 2015 Hasan and Jonas departed to Chicago Midway Airport for Hasan to fly to Egypt. Hasan and Jonas are arrested at the airport upon their arrival.

**22. Name(s):** Ramiz Zijad Hodzic, Sedina Unkic Hodzic, Nihad Rosic, Mediha Medy Salkicevic, Armin Harcevic & Jasminka Ramic

**District:** Eastern District of Missouri

**Arrest Date:** February 2015

**Procedural Posture:** Indictment filed against the six defendants on February 5, 2015.

Sedina Hodzic was released on \$1 million dollar bond / \$250,000 bail on April 16, 2015.

Armin Harcevic and Hodzic are the only two defendants out of custody. Last status conference held on June 25, 2015 with both parties agreeing to a continuance for August 20, 2015. Deadline for filing non-evidentiary motions to dismiss scheduled for October 30, 2015

**Charges:**

18 U.S.C. § 2339 (A) – Conspiracy to Provide Material Support to a Foreign Terrorist Organization (Ramiz Zijad Hodzic, Sedina Unkic Hodzic, Nihad Rosic, Mediha Medy Salkicevic, Armin Harcevic & Jasminka Ramic)

18 U.S.C. § 956 (2) – Conspiracy to Kill or Maim Persons in a Foreign Country (Ramiz Zijad Hodzic & Nihad Rosic)

18 U.S.C. § 2339 (A) – Providing Material Support to a Foreign Terrorist Organization (Ramiz Zijad Hodzic, Sedina Unkic Hodzic, Nihad Rosic, Mediha Medy Salkicevic, Armin Harcevic & Jasminka Ramic)

**Facts:**

The defendants in this case range from 26 to 43 years old. Ramiz and Sedina Hodzic are married with three young children. Sedina Hodzic was released on bond as she was the only one to tend to the children. The defendants all hail from Bosnia and are all Muslim. Following the war in the former Yugoslavia in the early 1990's, nearly 70,000 Bosnians sought refuge in St. Louis, Missouri. All the defendants in this case were residing in St. Louis or outer lying suburban areas prior to their arrest. The male defendants all held blue-collar jobs in the United States such as tow-truck drivers, mechanics, and a manager of a hardware shop.

The unsealed indictment was filed in February of 2015 and alleges that the group of six defendants would pool their money together through bank wires, PayPal Accounts, and money orders to Siki Ramiz Hodzic. Hodzic who would in turn wire the funds to a known Albanian-American, who is listed in the indictment as Abdullah Ramo Mudzahid. Mudzahid fled the United States in 2013 to join ISIS in Syria. Hodzic would send payments of up to \$3,000 in cash directly to Mudzahid, or other known ISIS operatives in southern Turkey and in Syria. According to the complaint, the defendants made over eight (8) transactions to individuals in Syria including Mudzahid. These transactions ranged from \$1,000 dollars to \$3,000.

The six defendants would message each other on Facebook and an instant messenger program and talk in "code" regarding their funds being sent over. They would refer to each other as "lions" and refer to Syria as "the beach." The complaint further alleges that Siki Hodzic sent packages of army uniforms, boots, rifle scopes, and binoculars to ISIS affiliates in Syria, Bosnia,

and Turkey. The defendants also wired money to individuals in Bosnia that they knew were attempting to travel to Syria to join ISIS.

23. **Name(s):** Christopher Cornell a/k/a Raheel Mahrus Ubaydah

**District:** Southern District of Ohio- Western Division

**Arrest Date:** January 14, 2015

**Procedural Posture:** Superseding Indictment filed on May 7, 2015. Last status conference was held on June 1, 2015. The Court will conduct a status/scheduling conference with counsel for both parties on November 10, 2015. Cornell has remained in custody since his arrest in January

**Charges:**

18 U.S.C. § 1114 – Attempted Murder of Government Employees and Officials

18 U.S.C. § 373 – Solicitation to Commit a Crime of Violence

18 U.S.C. § 924 (c) – Possession of Firearm in Furtherance of Attempted Crime of Violence

18 U.S.C. § 2339 (B) – Material Support to a Foreign Terrorist Organization

**Facts:** Christopher Cornell is a 20 year-old Caucasian male who is born and raised in Cincinnati, Ohio. Christopher has lived with his parents his entire life. It is not clear when Christopher converted to Islam, but he has made an adamant point to the media that he is a Muslim and has been for quite a while.

The complaint states that he maintained a twitter account under his Muslim name of Raheel. A CHS introduced the FBI to Cornell after showing Cornell's twitter account to FBI agents. Cornell's twitter page was filled with pro-ISIS tweets and photographs. The complaint states that the CHS began working for the FBI to receive a favorable disposition regarding his unrelated criminal case that may be in the district. The FBI then used the CHS to lure Cornell into agreeing to conduct a domestic plot of terror.

The CHS and Cornell met several times between October 2014 and January 2015. During these meetings Cornell talked to the CHS about conducting a plot in Washington, D.C. Cornell claimed to have a desire to attack the Capitol Building and kill members of Congress. He also

showed the CHS his research into building pipe-bombs and popular tourist sites in Washington D.C. Cornell stated to the CHS that he “wanted to conduct an attack as soon as possible.”

Cornell acknowledged to the CHS that he would probably not receive permission from foreign ISIS fighters to conduct the attack as he did not have official ties to ISIS. Cornell claimed he would conduct the attack on the Capitol with the help of the CHS, to lend moral support to ISIS fighters in Syria. In a recorded conversation, Cornell stated to the CHS that they needed guns for the attack. Cornell stated he wanted to “kill as many people as possible as they tried to escape from the bomb attack.” On January 14, 2015 Cornell purchased two M-15 semi-automatic rifles from a local gun store in Cincinnati. After exiting the store Cornell was arrested without incident.

24. **Name(s):** Tairod Nathan Webster Pugh

**District:** Eastern District of New York

**Arrest Date:** January 2015

**Procedural Posture:** Indictment filed March 2015 charging Pugh with one count of Attempt to Provide Material Support to a Foreign Terrorist Organization and one count of Obstruction and Attempted Obstruction of an Official Proceeding

**Charges:**

18 U.S.C. § 1512 (c) (1) & (2) – Obstruction and Attempted Obstruction of an Official Proceeding.

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

**Facts:** Tairod Nathan Webster Pugh is a 47 year-old African-American male who’s last known address in the U.S. was Neptune, New Jersey. Pugh served in the U.S. Air force from 1986 to 1990. While in the Air Force, Pugh worked as an avionics instrument system specialist and received training in the installation and maintenance of aircraft engine, navigation, and weapons systems. After moving to San Antonino in 1998, it is alleged that Pugh converted to Islam and became “increasingly radical with anti-American sentiments and beliefs.”

According to the complaint, Pugh worked for American Airlines during a good portion of the 90’s and early 2000’s. In 2001, the FBI received a tip from Pugh’s co-worker that Pugh

sympathized with Osama Bin Laden and thought attacks against the U.S. were justified. In 2002, an associate of Pugh's was interviewed by the FBI and told agents that Pugh expressed interest in traveling to Chechnya to fight for Jihad against the Russians. Pugh worked as an army contractor for DynCorp in Iraq for several years but eventually moved to Egypt. It's reported that he was living overseas for approximately the last year and a half immediately prior to his arrest. He lived in Egypt, Dubai, and Jordan, among other locations in the Middle East.

On January 10, 2015 Pugh was stopped for questioning after arriving at the Ataturk Airport in Istanbul off of a flight from Egypt. Pugh claimed to be a pilot with the U.S. Special Forces and he sought to enter Turkey for vacation. Pugh refused to have his laptop searched, and was ultimately denied entry into Turkey by Turkish Officials. When he arrived in Egypt the same night he was detained pending deportation to the United States. It was determined that Pugh's possessions at the time of his detention in Egypt which included a laptop, iPod, Samsung Galaxy S4 mobile phone, a Pixel mobile phone, and five USB thumb drives had all be purposely damaged by Pugh to avoid detection. Pugh's iPod appeared to have been reset and the thumb drives were broken in half. Pugh provided the password to his Samsung phone to Egyptian officials which contained several photographs of guns, and different sections of commercial airplanes.

On January 11, 2015 FBI agents obtained Pugh's electronic media devices and other possessions and on January 14, 2015 a search warrant was issued. A search of Pugh's laptop and email found several letters to his Egyptian wife "Misha" in which Pugh claims he is a "Mujahid" and will be going to Syria to fight for the Islamic Caliphate. Pugh goes on to tell his wife that they will start a family in the Islamic State once they are victorious. If he dies in battle than he would receive the ultimate reward which is a spot in paradise. In addition, Pugh's laptop contained a chart of crossing points between Turkey and Syria including specific places where one may cross the border between Turkey and Syria.

On January 12, 2015 Pugh returned to the U.S. from Egypt. Shortly after his arrival a government agent approached Pugh and struck up a conversation with him. It has not been determined if the agent identified himself as a member of law enforcement. Pugh related to the agent of his experience getting kicked out of Turkey and Egypt, stating that he should have shaved his beard and changed into pants before trying to enter Turkey so as to avoid drawing suspicion. Pugh was arrested shortly thereafter.

25. **Name(s):** Yusra Ismail

**District:** District of Minnesota

**Arrest Date:** Charged in Absentia December 2014

**Procedural Posture:** Charged in Absentia. Ismail is believed to be in Syria.

**Charges:**

18 U.S.C. § 1544 – Knowingly Use, or Attempt to Use, a Passport Issued or Designed for Use by Another

**Facts:**

According to the complaint, the FBI stated that it has investigated dozens of individuals alleged to have traveled or attempted to travel to Syria to join the Islamic State. Through the course of the FBI's investigation into Ismail, they concluded that Ismail departed the U.S. using a stolen passport and likely traveled to Syria.

On August 25, 2014, an adult female listed as Victim 1 filed a report with the Minnesota Police alleging her passport had been stolen by Yusra Ismail. Victim 1 described how on August 18, Ismail called her unexpectedly and asked to meet at her house. Ismail told Victim 1 she was traveling to Africa soon for a cousin's wedding and asked to see her American passport to see how they looked. Later during the visit Ismail asked to use Victim 1's bathroom and ultimately stole her passport after seeing where she kept it. Ismail texted the woman an ominous message two days later, asking her to forgive her if she had ever transgressed against her. A week later, friends of the woman told her that it was alleged Ismail traveled overseas by using another person's passport. Victim 1 checked her notice that her passport was missing. She immediately notified the police and suspected Ismail took it.

The FBI ran a search query of all flights that month and found that the woman's identity was used to board a Delta flight to Turkey. Two witnesses told authorities that Ismail told them about her trip after she had landed in Turkey. It was also revealed that Ismail sent her family an online message several weeks later letting them know she was safe in Syria and had officially joined ISIS. The investigation further discovered that Ismail is not a U.S. citizen, thus barring her from traveling to Turkey.

26. **Name(s):** Abdullahi Yusuf & Abdi Nur

**District:** District of Minnesota

**Arrest Date:** November 2014

**Procedural Posture:** Yusuf plead guilty on February 26, 2015 to the one-count information of Conspiracy to Provide Material Support to a Foreign Terrorist Organization. Yusuf has spent time both in custody and in a halfway house pending trial and following his plea. Sentencing has been continued following his plea in February, with a status conference scheduled at the end of July. The judge indicated he would make a decision on whether Yusuf would be allowed back into a halfway house. Yusuf was taken into custody in May of 2015 for a violation of his release. It has been reported that a knife was found under Yusuf's bed at the halfway house.

**Charges:** 18 U.S.C. § 2339 B- Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization (Yusuf and Nur)

**Facts:**

Abdullahi Yusuf and Abdi Nur are lifelong friends that grew up in Minneapolis, Minnesota. Nur was dating Yusuf's sister at the time of Yusuf's arrest and maintained an "older-brother" relationship with Yusuf. Nur and Yusuf are amongst a group of nearly fifteen (15) Somali-American males aged 17 to 25 who have either traveled to Turkey to join ISIS or have attempted to do so.

Nur and Yusuf are alleged to have twitter connections with a man by the name of "Miski". Miski is a well-known ISIS recruiter who is suspected to be a Somali-American now living in Syria or Turkey. According to the FBI, Miski has successfully lured young Somali-Americans to join ISIS in Syria.

In April of 2014, Yusuf went to the Minneapolis Passport Office and applied for an expedited passport. He identified his travel destination as Turkey. A passport specialist grew weary of Yusuf following several responses he provided about his travel. Yusuf told the specialist he was going to Turkey for a vacation, but admitted he did not book a hotel room nor did he know anyone in Turkey. The passport specialist notified her supervisor who in turn notified the FBI field-office.

The FBI began surveillance of Yusuf in May of 2014 and observed him to open a checking account at a local Wells Fargo Bank. A week later he would deposit \$1,500 cash into his new account and then use his debit card to purchase a \$1400 plane ticket from Minneapolis to Istanbul. On May 28<sup>th</sup>, Yusuf's father dropped him off at school where Yusuf ditched class, and was picked up by a friend to drive him to the airport. At the airport Yusuf was questioned and detained by FBI agents waiting for him at the terminal.

Two days after Yusuf's arrest, a close friend of Nur's, known as "witness 1", went to the FBI office to report Nur as missing. The witness told the FBI that Nur had sent her several messages on KIK that he had made it to "*the dawla*". Agents were able to confirm that Nur was not on his return flight back to the United States scheduled for the following day. Both Nur and Yusuf were seen together at a Macy's department store the evening prior to Yusuf's departure. Both men also had Facebook and Twitter accounts filled with pro-ISIS links and videos.

27. **Name(s):** Heather Elizabeth Coffman

**District:** Eastern District of Virginia

**Arrest Date:** November 14, 2014

**Procedural Posture:** Coffman plead guilty to her 1 count information on January 30, 2015. On May 11, 2015 she was sentenced to 54 months in prison and 3 years of post-release supervision.

**Charges:**

18 U.S.C. § 1001 (a) – Making a Material False Statement or Representation  
Regarding an Offense Involving International or Domestic Terrorism

**Facts:**

Heather Coffman is a 29 year-old Caucasian woman from Glen Allen, Virginia. Throughout the investigation, Coffman maintained up to six (6) active Facebook accounts. All accounts included Arabic aliases that praised Jihad or directly referred to her as "*the mother of Jihad*." The Facebook accounts also had banners and pictures of ISIS flags.

According to the complaint, an FBI undercover employee (UCE) had been in contact with Coffman since July 2014, both online and in-person. The UCE portrayed to be a Muslim

who shared similar pro-ISIS views. Coffman befriended the UCE after she claimed that her boyfriend, a Muslim man from Albania had broken up with her. Coffman confided to the UCE that not only was she going to marry the man, but she also sent him money, and made several online connections with ISIS facilitators for him to travel to Turkey to join ISIS.

The UCE began to meet with Coffman much more frequently following the break-up with Coffman's now alleged former "fiancé". In November of 2014, Coffman picked up the UCE from the Richmond Virginia International Airport. The UCE told Coffman that she was returning from traveling to Turkey. The UCE met with Coffman the next several days, asking for Coffman's help to facilitate her travel into Syria.

In one meeting the UCE told Coffman it was easy for her to travel to Turkey but once the UCE got to Turkey she needed help finding someone who could get her into Syria to join ISIS. Coffman told the UCE she would reach out to her old facilitators and friends online to help her. A week later, Coffman met with the UCE for another meeting in which Coffman informed the informant her friend in Syria was willing and able to help her.

On November 13, 2013 two FBI agents approached Coffman at her workplace, and asked her questions pertaining to her online activity, as well as her relationship with the UCE. Coffman denied being supportive of ISIS or any other terrorist organizations, denied that she was helping the UCE travel to Turkey to join ISIS, and denied any discussions about terror organizations. After the interview was concluded, Coffman was told that lying to a federal agent was a crime and was arrested when she arrived home.

28. **Name(s):** Mohammed Hamzah Khan

**District(s):** Northern District of Illinois

**Arrest Date:** October 2014

**Procedural Posture:** Status hearing held and continued to 8/6/15. Defense counsel has indicated they will make an argument for a bail package at the next court date.

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

**Facts:**

Mohammed Hamzah Khan is a 19 year-old from Bolingbrook, Illinois. His parents are both engineers who came to the United States from India in the early 1980's. His parents have said that they raised Mohammed and his siblings in a very insulated and protective upbringing that revolved around going to the mosque, memorizing the Quran, and attending a private Islamic school that was located down the street from their house. The children lived in a high-class area in Bolingbrook. The parents have told the press their favorite activities were watching Saturday cartoons and eating pizza. They have also indicated that they believe their son was brainwashed by radical imams online.

Federal authorities grew suspicious of Khan after online postings in support of ISIS and placed him under electronic surveillance after a warrant was issued. Khan also made online connections with ISIS facilitators in Turkey, and used the messenger system KIK to connect with a facilitator. Khan's parents noticed that he had been spending much more time on his phone and secluded in his room but made nothing of it.

In September of 2014, Khan purchased a round-trip ticket for himself worth an estimated \$3,000. The ticket had a scheduled departure date of October 23, 2014 to Turkey. Khan also wrote hand-written notes to his family and left behind notepads and drawings with his aspirations to join ISIS, his admiration of ISIS fighters, and telling his parents not to contact the authorities. Khan was apprehended at Chicago O'Hare Airport on October 4, 2014 as he attempted to board his flight.

**29. Name(s):** Donald Ray Morgan a/k/a Nasser Abdul Raheem

**District(s):** Middle District of North Carolina

**Arrest Date:** August 2, 2014

**Procedural Posture:** Morgan plead and was sentenced to a term of 243 months, 63 months as to count 1- Felon in Possession of a Firearm and 180 months as to the other count- Attempt to Provide Material Support to a Foreign Terrorist Organization, with the terms to run consecutive. He was also sentenced to three years (3) post-release supervision.

**Charges:**

18 U.S.C. § 922 (g) (1) & §924(a) (2) – Felon in Possession of a Firearm

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

**Facts:**

Donald Ray Morgan is a 44 year-old Caucasian male born and raised in North Carolina. Morgan was a former bodybuilder, and all-pro high school athlete. When he was younger Morgan attempted to join the Marines as well as his local Sheriff's department but failed at both due to his inability to pass basic training and psych exams for either position. Morgan developed a drug and alcohol addiction in his late twenty's that has plagued him all of his life. In 1997, he was convicted of Discharging a Firearm into Occupied Property, a felony in North Carolina and sentenced to 3 years in prison.

According to his statement of facts filing, an FBI source provided information to them that he had purchased an AK-47 and another assault rifle from Morgan on an online gun transaction forum. Through the information brought in by the source, the FBI began its surveillance of Morgan regarding the weapons possession, while also growing more suspicious of his online activity. The FBI was able to confirm Morgan's IP address to the postings and private messages on the forum, including photographs Morgan sent to the buyer with him in possession of the guns.

Morgan met a Lebanese women in the mid 2000's and converted to Islam shortly thereafter. He married the woman a day after converting to Islam. On January 22, 2014 Morgan flew to Beirut, Lebanon to live in her hometown and raise their children in a Muslim country. Morgan maintained several Twitter profiles, a Facebook Account, and a Google+ Plus account, all of which had pictures of ISIS fighters, pro-ISIS videos and postings, as well as calls for other Muslims to engage in jihad against "western oppressors".

On May 17, 2014 Morgan attempted to enter Syria for the purpose of joining ISIS. He flew from Beirut to Istanbul alone. When he arrived at the airport in Istanbul he was questioned by Turkish customs officials and denied entry into the country based on their suspicions' of Morgan. Following his return back to Beirut, Morgan grew more vocal in his call to support to ISIS. Between May and August 2014, Morgan consistently used social media platforms to call for the killing of "infidels" and having Muslims commit jihad to please God.

Morgan didn't just catch the attention of the FBI prior to his arrest, he also caught the attention of an NBC producer in Beirut. The producer was quite intrigued after seeing an English speaking man dressed in traditional garb in the middle of Beirut, a city known for its posh style and secular society. In the summer of 2014, Morgan conducted an interview with NBC news in which he acknowledged he believed in Jihad against western countries, and that he was aware that his actions of trying to go to Syria to join ISIS was in breach of American law, and could constitute a charge of support to a foreign terror organization.

On August 2, 2014 Morgan left Beirut and took a flight back to JFK airport, after running low on money and continued arguments with his wife. Unbeknownst to him, federal authorities had already obtained an arrest warrant against Morgan for the weapons transaction. Morgan was arrested at JFK airport and transferred to the Middle District of Carolina to answer to the warrant. A Superseding Indictment was then filed upon his return to the district charging him with material support to a foreign terrorist organization.

**30. Name(s):** Adam Dandach a/k/a Fadi-Fadi Dandach

**District(s):** Central District of California

**Arrest Date:** July 3, 2014

**Procedural Posture:** Dandach has remained in custody since his arrest. The matter has been scheduled for a status conference on July 20, 2015. Motions have been filed by both defense and the government pertaining to evidence of insanity or mental disease and are expected to be argued this month. The matter is set for trial on September 22, 2015

**Charges:**

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

18 U.S.C. § 1542- False Statement in Application for Passport

18 U.S.C. § 1512 (c) (1) – Attempt to Destroy and Conceal records for use in an Official Proceeding

**Facts:**

Adam is a 21 year-old male of Lebanese descent. His parents were born in Lebanon, but Adam was born and raised in the United States. Adam did not have a relationship with his estranged father, but was very close to his mother. On June 17, 2014 Dandach applied for an expedited U.S. passport from the U.S. Department of State. On his application he wrote that he lost his previously issued passport that was issued in 2013. He indicated that he accidentally threw it out while throwing out other paperwork when he was planning to move out of his mother's home.

The complaint nor the affidavit make out how authorities were able to start their surveillance against Dandach, but based on several media reports, Adam maintained a number of twitter accounts and reached out to prominent figures of ISIS on Twitter.

In early December of 2013, Adam told his mother Sawsan and older brother Ghassan that he made reservations to fly to Greece on Christmas day of 2013, with the hopes of joining ISIS in Syria. After hearing this news, Sawsan took and hid Adam's passport as well as any money he had. She froze a joint-bank account that was in her and her son's name. This did not stop Adam from attempting to leave the country again, who applied for a new passport on June 17, 2014 and was able to receive an expedited passport a few short weeks later.

Dandach purchased a one-way ticket from LAX to Istanbul, but was arrested by the FBI as he checked into his flight in Los Angeles. When questioned by FBI agents about his passport application and the new passport, Dandach gave the agents the same reason for getting a new passport that he put on his application; he lost the passport while cleaning out his room. Dandach was arrested and taken into custody without incident. FBI agents called Ghassam and Sawsan following their discussion with Dandach who both confirmed that they hid his passport from him based on his previous revelation to his family about joining ISIS. FBI agents retrieved Dandach's laptop following his arrest to find all materials and recent searches wiped off the computer, and the computer recently reset to its original factory settings thus deleting any of the history on it.

31. **Name(s):** Michael Todd Wolfe a/k/a Faruq

**District(s):** Western District of Texas

**Arrest Date:** June 17, 2014

**Procedural Posture:** On June 5, 2015 Wolfe was sentenced to 82 months after pleading guilty to Attempting to Provide Material Support to a Designated Foreign Terrorist Organization. Wolfe was held since his arrest and waived his detention hearing in June of 2014.

**Charges:**  
18 U.S.C. § 2339 B- Attempting to Provide Material Support to a Designated Foreign Terrorist Organization

**Facts:**

Michael Todd Wolfe is a 24 year-old Caucasian male from Austin, Texas. According to the USAO “Wolfe applied for and acquired a U.S. Passport, participated in physical fitness training, practiced military maneuvers and made efforts to conceal his communications about his plans to travel overseas to engage in violent jihad.” The USAO also stated in a press release that Wolfe purchased airline tickets so that he could travel to Europe to meet a FBI undercover employee (unbeknownst to him) whom he believed would facilitate travel to Syria through Turkey. Wolfe drove to Houston, Texas and was arrested on June 17, 2014 as he attempted to board a flight to Toronto, Canada with a final destination in Denmark.

According to Wolfe’s wife, Michelle Furr, who was also apprehended with Wolfe at the airport, Wolfe only pled guilty because the government insuated that authorities “*could take our children and prosecute the family.*” In an exclusive interview with a local reporter, Furr went on to describe the plot against her and her husband executed by the FBI. Furr stated that both she and her husband converted to Islam a couple years ago. They met a group of couples in the Austin, Texas area that had formed a “recent convert” program. The program allowed new Muslim couples to meet, have dinner together almost once a week, and discuss their thoughts and beliefs about Islam. Within this group, the FBI implanted a couple, who were undercover employees (UCE) to try and radicalize members of the group. The UCE’s, who went by Rasheed and Melissa, were 10 years older than Wolfe and his wife and quickly found an attachment to their new found friends. When other members of the group called out Rasheed and Melissa for their extreme views, Wolfe quickly defended his new found friend Rasheed. The group broke off ties with the UCE’s and attempted to warn Wolfe their fears that Rasheed and Melissa could be associated with the FBI.

On November 1, 2013, following ten (10) months of interactions between the two couples, Rasheed told Michael that he “occasionally helped individuals who wanted to travel for jihad in Somalia and Syria” during a recorded conversation in the couple’s home. Following this conversation, Furr says that Rasheed contacted Michael at least fifty (50) times in a span of a month; including emails, text messages, phone-calls, and unannounced stops at the couple’s home trying to persuade Michael and his wife to travel to Syria. From November 2013 until Wolfe’s arrest in June 2014, he began to communicate with Rasheed regarding his plans and preparations for their departure from the United States and attempts to move to Syria. Wolfe obtained passports through Rasheed’s help for his family, and told Rasheed that he took martial arts and cross-fit classes in preparation for his eventual move to Syria to fight for ISIS. Wolfe remained a bit confused on whether to join ISIS or Jabhat Al-Nusra based, but Rasheed would sway Wolfe’s opinion to join ISIS, as he assured him he had local connections in Turkey and Syria for a smooth transition for his family. On May 2, 2014 Wolfe confirmed to the UCE (Rasheed) that he had purchased his family plane tickets to travel to Europe and would meet with Rasheed’s local connections soon thereafter. Wolfe was subsequently arrested as he checked into the Houston airport with his family.

32. **Name(s):** Shannon Maureen Conley

**District:** District of Colorado

**Arrest Date:** April 2014

**Procedural Posture:** Conley plead on September 10, 2014 to Count 1 of the Information. On January 23, 2015 she was sentenced to 48 months imprisonment and, post-release supervision for a period of 3 years. Within Conley’s plea agreement she agreed to cooperate with the USAO against other individuals named and unnamed in the indictment. Conley remained in custody throughout her pre-trial matters.

**Charges:** 18 U.S.C. § 2339 B- Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization

**Facts:** Shannon Conley is a 19 year-old Caucasian female from outside of Boulder, Colorado. She is a recent convert to Islam. She lived with her parents her entire life. According to her plea agreement Conley came under the investigation of the FBI after a local pastor called the police and the Colorado FBI division, to report a teen who had been spotted several times looking “suspicious.” It was noted that she appeared to have been taking notes at the church’s main campus and screamed at the pastor once when he asked her what she was doing. The pastor said he became much more vigilant of strange individuals around the church following a shooting in 2007 inside the church. The Faith Bible Chapel was attacked by an atheist extremist in 2007 resulting in the death of two church members. Conley was interviewed by FBI Agents a few days later and told the agents she supported jihad, and that it may be permissible to kill innocent civilians. Following the interview, she was placed under electronic and physical surveillance.

Conley and her co-conspirator, Youshr Mouelhi met on the internet. They shared their thoughts on Islam together and believed that it required participation in violent jihad in order to be a true Muslim. Mouelhi told Conley that he was an active member of ISIS living in Syria. Conley and Mouelhi agreed to get engaged when she arrived in Syria. Mouelhi along with other unnamed co-conspirators, arranged for Conley to travel from Colorado to Syria to be with him. Before traveling to Syria they agreed Conley should acquire some skills that would prove beneficial to ISIS so she joined the US Army Explorers in September of 2013. Conley traveled to Texas several times to attend the USAE trainings. On March 29, 2014 Mouelhi and other co-conspirators purchased a ticket for Conley that was to depart on April 8, 2014. On April 8, 2014 Conley went to the Denver International Airport to fly to Turkey to meet Mouelhi. Conley was arrested by FBI Agents prior to boarding her flight to Turkey.

33. **Name(s):** Avin Marsalis Brown a/k/a Musa Brown & Akba Jihad Jordan

**District:** Eastern District of North Carolina

**Arrest Date:** March 2014

**Procedural Posture:** Brown and Jordan were indicted on one-count of Conspiracy to Provide Material Support on April 1, 2014. Brown pled guilty to the indictment in August of 2014, while Jordan pled guilty on October 16, 2014. Both plea agreements have remained sealed by the court. Both men have sentencing hearings set for August 12, 2015.

**Charges:** 18 U.S.C. § 2339 B- Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization

**Facts:** Akba Jihad Jordan, 22 and Avin Marsalis Brown 21, are both African-American males who live in Raleigh, North Carolina. Both were good friends with one another since their early teenage years and both grew up in Muslim households.

According to the complaint and the affidavit in support of the complaint, in May of 2013 Brown was in contact with a Confidential Human Source (CHS #1), and in June of 2013 Brown started having personal meetings with another Confidential Human Source (CHS #2). Brown indicated to both informants that he and Jordan wanted to travel to Syria to join ISIS in June of 2013. In numerous conversations, Jordan discussed to Brown and the informants that he was in possession of an AK-47 rifle and a Mini-14 assault rifle. Jordan functioned as a pseudo physical fitness, firearms and tactics instructor to Brown and CHS #2. In November of 2013, Jordan remarked to CHS#2 that he may be the next person to be arrested for joining ISIS after watching a news report together in Jordan's apartment. Jordan repeatedly emphasized to Brown and CHS #2 the need to conduct physical training to prepare for eventual battle against the "Kufar".

On December 30, 2013 CHS#2 met with Brown and Jordan. Brown and Jordan reiterated their desires to travel to Syria to join ISIS. During the meeting Jordan went into his bedroom and returned with his AK-47, a Mini-14 assault rifle, ammunition, and a sword. Jordan showed both Brown and CHS#2 how to break down the AK-47. On January 26, 2014 Brown told CHS #2 and Jordan that he received his U.S. passport that he applied for and was making travel arrangements to Syria by way of Turkey in the coming weeks. Jordan told the two that he took his passport photograph and was in the process of applying for his passport. In February 2014, Brown purchased his tickets to fly from Raleigh, NC to Turkey in hopes of entering Syria and joining ISIS. On March 19, 2014 Brown was arrested at the Raleigh Durham International as he attempted to board his flight, while Jordan was arrested the same day in his apartment. A search

of Jordan's apartment yielded the same AK-47 and Mini-14 assault rifle he showed Brown and CHS #2 months prior.

34. **Name(s):** Nicholas Michael Teasant

**District:** Eastern District of California

**Arrest Date:** March 2014

**Procedural Posture:** Magistrate Judge Allison Claire initially ruled to have Teasant out on bond after a detention hearing held in May of 2014. Teasant's family was to post a \$200k bond with an extensive list of pre-trial release conditions set by. Conditions included full home incarceration secured by electric monitoring, psychiatric treatment, a ban on internet/computer/smart phone use and a requirement to continue to take prescribed medication. This ruling was overturned by the District Court Judge following an appeal by the government. Teasant has remained in custody. A next court date is scheduled for later this year.

**Charges:** 18 U.S.C. § 2339 B (a) (1) - Attempting to Provide Material Support to a Designated Foreign Terrorist Organization

**Facts:**

Nicholas Teasant is a 20-year-old Caucasian male from Acampo, California. Nicholas has an infant daughter with his girlfriend and lives with his parents. He is a student at San Joaquin Delta Community College. He does not own a car and does not have a license. Nicholas attempted to join the U.S. National Guard, but is in the process of getting discharged because he could not meet the minimum academic requirement of 15 credits. During his in custody Nick was psychiatrically evaluated and placed on psychotropic medications. He is currently under psychiatric care and has been compliant with his treatment and all the conditions set forth by the court.

The FBI began their investigation into Nicholas by viewing his Facebook, Google + Plus, and ask.fm accounts. On several occasions he tweeted pro-ISIS materials including an inquiry into how he get a hold of the "Lone Mujahid Pocketbook" which according to the FBI is a how-to-guide for becoming a "lone wolf" terrorist. A confidential human source (CHS) began to make contact with Teasant in October of 2013. CHS was a paid informant by the FBI that

began to have regular meetings with Teasant and portrayed himself as a recent convert to Islam just like Teasant. On several occasions Teasant told the CHS “he wanted to do something now”, and wanted to travel to Syria to join the Mujahedeen. On December 5, 2013 Teasant told the CHS via text message not to travel to Los Angeles or to use the subway due to an imminent attack or threat he was aware of due to his jihadi contacts. During one meeting with the CHS, Teasant indicated he would blow up the daycare his daughter attended because it was a “Zionist reform church.” In February of 2014 the CHS informed Teasant that his “mentor” wanted to meet him so they could go forward with their plan of having Teasant join the ISIS. During another meeting Teasant told the CHS that he had no plans of returning to the United States to act as a facilitator for ISIS, but rather would be “*a commander and I’m going to be on the front of every single newspaper in the country... I want my face on FBI’s top twelve most wanted.*”

On March 5, 2015 Teasant and the CHS finally met the CHS’ mentor who was an undercover employee (“UCE”). Two days later the three met again at a park near Teasant’s community college. The UCE asked Teasant if he still wanted to join ISIS in which Teasant replied affirmatively. He advised Teasant to purchase a train ticket to the Canadian border and to plan on traveling on March 21. He went on to add that he would meet Teasant in Canada for the next phase of his travel plans.

In order to generate funds for the trip Teasant sold his laptop. CHS indicated he had a friend who would be willing to purchase his laptop. Teasant sold the laptop to the “friend” which was another UCE from the FBI. The FBI searched the laptop and found excerpts of Inspire Magazine, , and web searches for how to build a bomb.

On March 8, 2014 Teasant purchased his train ticket from Lodi, California to Vancouver, Canada. Teasant made several transfers until he finally reached Seattle, Washington. On March 16, 2014 US Customs and Border Patrol at a train and bus station just outside of Blaine, Washington picked him up and placed him under arrest.