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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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CR19-02162 TUC-JGZ(EJM)

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA

INDICTMENT

United States of America,
 Plaintiff,
 vs.
 Ahmed Mahad Mohamed and
 Abdi Yemani Hussein,
 Defendants.

Violations:

- 18 U.S.C. § 2339B
(Conspiracy to Provide Material Support
and Resources to a Designated Foreign
Terrorist Organization)
Count 1
- 18 U.S.C. §§ 2339B and 2
Attempting to Provide Material Support
and Resources to a Designated Foreign
Terrorist Organization
Count 2
- 18 U.S.C. §§ 981(a)(1)(C) and (G); 28
U.S.C. § 2461
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

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1 COUNT 1

2 From a time unknown to the Grand Jury to on or about July 26, 2019, in the
3 District of Arizona and elsewhere, defendants AHMED MAHAD MOHAMED and
4 ABDI YEMANI HUSSEIN, and others known and unknown to the Grand Jury,
5 knowingly conspired and agreed with each other to provide material support and
6 resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1),
7 that is, personnel, namely themselves and each other, to a foreign terrorist organization,
8 namely the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times was
9 designated by the Secretary of State as a foreign terrorist organization pursuant to Section
10 219 of the Immigration and Nationality Act, knowing that ISIS was a designated terrorist
11 organization, and knowing that ISIS had engaged in, and was engaging in, terrorist
12 activity and terrorism.

13 In violation of Title 18, United States Code, Section 2339B.

14 COUNT 2

15 From a time unknown to the Grand Jury to on or about July 26, 2019, in the
16 District of Arizona and elsewhere, AHMED MAHAD MOHAMED and ABDI YEMANI
17 HUSSEIN, knowingly attempted to provide material support and resources, as that term
18 is defined in Title 18, United States Code, Section 2339A(b)(1), that is, personnel,
19 namely themselves and each other, to a foreign terrorist organization, namely the Islamic
20 State of Iraq and al-Sham (“ISIS”), which at all relevant times was designated by the
21 Secretary of State as a foreign terrorist organization pursuant to Section 219 of the
22 Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist
23 organization, and knowing that ISIS had engaged in, and was engaging in, terrorist
24 activity and terrorism.

25 In violation of Title 18, United States Code, Sections 2339B and 2.

1 **FORFEITURE ALLEGATION**

2 Upon conviction of one or more of the offenses alleged in Counts 1 through 2 of
3 this Indictment, defendants, AHMED MAHAD MOHAMED and ABDI YEMANI
4 HUSSEIN, shall forfeit to the United States:

- 5 1) pursuant to Title 18, United States Code Section 981(a)(1)(C) and Title 28, United
6 States Code, Section 2461(c), any property, real or personal, which constitutes or is
7 derived from proceeds traceable to said offenses; and
8 2) pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United
9 States Code, Section 2461(c), any and all assets, foreign and domestic, of the
10 defendants; any and all assets, foreign and domestic, affording the defendants a
11 source of influence over any entity or organization engaged in planning or
12 perpetrating any Federal crime of terrorism, as defined in Title 18, United States
13 Code, Section 2332b(g)(5); any and all assets, foreign and domestic, acquired or
14 maintained with the intent and for the purpose of supporting, planning, conducting,
15 or concealing any Federal crime of terrorism, as defined in Title 18, United States
16 Code, Section 2332b(g)(5); any and all assets, foreign and domestic, derived from,
17 involved in, or used or intended to be used to commit any Federal crime of terrorism,
18 as defined in Title 18, United States Code, Section 2332b(g)(5).

19 The property to be forfeited includes, but is not limited to \$10,002 in U.S. currency.

20 If any of the property described above, as a result of any act or omission of the
21 defendants: a) cannot be located upon the exercise of due diligence; b) has been transferred
22 or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of
23 the court; d) has been substantially diminished in value; or e) has been commingled with
24 other property which cannot be divided without difficulty, it is the intent of the United
25 States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title
26 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said

1 defendants up to the value of the above forfeitable property, including, but not limited to,
2 all property, both real and personal, owned by the defendants.

3 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and (G) and
4 Title 28, United States Code, Section 2461(c) and Rule 32.2(a), Federal Rules of Criminal
5 Procedure.

6
7
8 A TRUE BILL

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10 **/s/**

11 _____
12 Presiding Juror

13 MICHAEL BAILEY
14 United States Attorney
15 District of Arizona

16 **/s/**

**REDACTED FOR
PUBLIC DISCLOSURE**

17 Beverly K. Anderson
18 Kevin C. Hakala
19 Assistant United States Attorneys
20 Dated: August 14, 2019