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DISTRICT OF ARIZONA  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
Plaintiff,

v.

Abdul Khabir Wahid,  
a.k.a Abdul Khabir Hyman,  
a.k.a Marion Marshall Hyman,  
a.k.a AK,  
Defendant.

CR-17-00360-PHX-JJT(DKD)

**INDICTMENT**

VIO: 18 U.S.C. § 1001(a)(2)  
(False Statements)  
Count 1

18 U.S.C. § 1512(b)(3)  
(Witness Tampering)  
Count 2

THE GRAND JURY CHARGES:

**Introduction**

Beginning prior to February 1, 2014, and continuing through May 3, 2015, ABDUL KHABIR WAHID (WAHID), Elton Francis Simpson (“Simpson”), and Nadir Hamid Soofi (“Soofi”), resided in Phoenix, Arizona, and associated together.

On May 3, 2015, a group of individuals held a so-called Muhammad Art Exhibit and Contest at the Curtis Culwell Center in Garland, Texas. On or about May 3, 2015, on the day of the aforementioned contest, Simpson and Soofi drove to the Curtis Culwell Center in Garland, Texas, stopped their car, got out, and began shooting with assault rifles at security personnel and law enforcement. A security guard was struck by a bullet and

1 injured, and Simpson and Soofi were shot and killed by police officers. Beginning on the  
2 evening of May 3, 2015 and continuing throughout the time period relevant to this  
3 Indictment, the Federal Bureau of Investigation (FBI) conducted an investigation of the  
4 attack at the Curtis Culwell Center and interviewed hundreds of witnesses including  
5 WAHID. The investigation focused on Simpson's and Soofi's motives for the attack, their  
6 support/connection to ISIS, a designated foreign terrorist organization, and whether any  
7 coconspirators were involved. On May 6, 2015 and again on June 10, 2015 the FBI  
8 interviewed WAHID and questioned WAHID about his interactions with Simpson and  
9 Soofi.

#### 10 **Count 1**

11 On or about May 6, 2015, at or near Phoenix, in the District of Arizona, in a matter  
12 within the jurisdiction of the Federal Bureau of Investigation, an agency of the United  
13 States, WAHID did knowingly and willfully make false, fraudulent, and fictitious material  
14 statements and representations during an investigation, which involved international and  
15 domestic terrorism; that is, WAHID stated: (1) that the only thing Simpson and Soofi gave  
16 WAHID during their May 1, 2015 visit to his home, was a bowl of soup, when in truth  
17 WAHID did know Simpson and Soofi gave him an envelope and a key during their May  
18 1, 2015 visit to his home; and (2) that the only things Simpson and Soofi discussed with  
19 WAHID on May 1, 2015, were the soup, WAHID's children, a good role model for his  
20 daughter, and Islam, when in truth WAHID did know that Simpson and Soofi also provided  
21 WAHID with instructions on May 1, 2015 to deliver the aforementioned envelope and key  
22 to another identified individual on or about the following Wednesday, May 6, 2015.

23 All in violation of Title 18, United States Code, Section 1001(a)(2).

#### 24 **Count 2**

25 On and between May 4, 2015 and July 8, 2015, in the District of Arizona, WAHID,  
26 did knowingly attempt to corruptly persuade another person, A.S., with the intent to hinder,  
27  
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1 delay, and prevent A.S. from communicating information to law enforcement officers  
2 relating to the commission of a Federal offense, specifically, by telling A.S. to withhold  
3 information from and to make misleading statements to the Federal Bureau of  
4 Investigation.

5 All in violation of Title 18, United States Code, Section 1512(b)(3).  
6

7  
8 A TRUE BILL

9 /S/

10 FOREPERSON OF THE GRAND JURY  
Date: March 14, 2017

11 ELIZABETH A. STRANGE  
12 Acting United States Attorney  
District of Arizona

13 /S/

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