

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

TREVOR WILLIAM FORREST,  
a/k/a "SHAIKH ABDULLAH FAISAL,"  
a/k/a "SHAIKH FAISAL"

Defendant.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, TREVOR WILLIAM FORREST, a/k/a "SHAIKH ABDULLAH FAISAL," a/k/a "SHAIKH FAISAL," of the crime of **CONSPIRACY IN THE FOURTH DEGREE AS A CRIME OF TERRORISM**, in violation of Penal Law §§ 105.10(1) and 490.25(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about July 13, 2014, to the present, with intent to intimidate and coerce a civilian population, influence the policy of a unit of government by intimidation and coercion, and affect the conduct of a unit of government by murder, assassination and kidnapping, committed the crime of Conspiracy in the Fourth Degree, in violation of Penal Law § 105.10(1), in that, with intent that conduct constituting a class B and class C felony be performed, to wit, Soliciting or Providing Support for an Act of Terrorism in the First Degree, in violation of Penal Law § 490.15, he agreed with one and more persons to engage in and cause the performance of such conduct.

## BACKGROUND OF THE CONSPIRACY

During the period of this conspiracy, the defendant, acting in concert with other individuals known and unknown to the Grand Jury, engaged in conduct constituting the crime of Soliciting or Providing Support for an Act of Terrorism in the First Degree. It was the purpose of the conspiracy to solicit and provide material support for acts of terrorism committed by or on behalf of the Islamic State of Iraq and the Levant (“ISIL”), a/k/a “ISIS,” a/k/a the “Islamic State,” a/k/a “Dawla,” a/k/a “D,” in Iraq and Syria, and elsewhere. ISIL is a designated Foreign Terrorist Organization, which has, among other things, committed systematic abuses of human rights and violations of international law, including the indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of their identity, kidnapping of civilians, forced displacement of Shia communities and minority groups, killing and maiming of children, rape, and other forms of sexual violence.

In furtherance of this conspiracy the defendant, acting in concert with other individuals known and unknown to the Grand Jury, used online applications and networks to publish and disseminate violent jihadist propaganda to recruit others to: (a) pledge an allegiance to ISIL and their leader Abu Bakr al-Baghdadi, (b) commit “hijrah” or travel to join ISIL, and (c) commit acts of terrorism, such as murder, against non-believers or “kuffar.”

It was further part of this conspiracy for the defendant, acting in concert with other individuals known and unknown to the Grand Jury, to use online applications and networks to facilitate the travel of others to join ISIL by providing them with contacts outside the United States and advice on how to evade detection by law enforcement.

## OVERT ACTS

In furtherance of said conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in New York County and elsewhere:

1. On or about July 13, 2014, the defendant published a statement online, as part of a lecture entitled "The Importance of Hijrah," which encouraged his followers to travel to join ISIL and provided advice on how to evade law enforcement.

2. On or about September 12, 2014, the defendant sent an email to another individual (email recipient no. 1) with the subject line "dawla numbers," which listed telephone numbers and stated in substance, "ring these numbers and for help to make your hijrah."

3. On or about November 21, 2014, the defendant sent an email to another individual (email recipient no. 2) with the subject line "Dawla numbers," which listed telephone numbers and stated in substance, "ring one of these numbers to get into Dawla."

4. On or about November 22, 2014, the defendant sent an email to another individual (email recipient no. 3) with the subject line "Dawla numbers," which listed telephone numbers and stated in substance, "ring one of these numbers to get into Dawla."

5. On or about November 26, 2014, the defendant sent an email to another individual (email recipient no. 4) with the subject line "dawla numbers," which listed telephone numbers and stated in substance, "ring one of these numbers to get into Dawla."

6. On or about December 10, 2014, the defendant sent an email to another individual (email recipient no. 5) with the subject line "the dawla numbers," which listed telephone numbers and stated in substance, "ring one of these numbers to get into Dawla."

7. On or about January 19, 2015, through on or about January 26, 2015, the defendant sent a series of emails to another individual (email recipient no. 6) with the subject line "a brother for u," which listed a name and telephone number and stated in substance "a brother in the dawla wants to interview u for marriage. Pls whatsapp him."

8. On or about January 19, 2015, through on or about January 22, 2015, the defendant sent a series emails to another individual (email recipient no. 7) with the subject line “a brother wanna interview,” which listed a name and telephone number and stated in substance “a brother in the dawla wants to interview u for marriage. Pls whatsapp him.”

9. On or about February 27, 2016, the defendant published a statement online, as part of a lecture entitled “The Manhaj of Establishing the Shariah,” which stated in substance, “the way forward is not the ballot. The way forward is the bullet. That is the only method that the Rasul [the Prophet Muhammad] taught us.”

10. On or about November 5, 2016, the defendant published a statement online, as part of a lecture entitled “Can the Caliphate Survive,” which stated in substance, “[s]o I put it to you the Caliphate is legitimate. Why? Because they did [sic] jihad against God’s enemies and they implemented the Shar’ia and they continue to implement the Shar’ia. It is compulsory on all Muslims to give their bayah [meaning oath of allegiance] to the Caliph, Abu Bakr al-Baghdadi.”

11. On or about November 29, 2016, in New York County, the defendant sent a series of messages to an Undercover Officer known to the Grand Jury (the “Undercover Officer”).

12. On or about November 30, 2016, in New York County, the defendant sent a message to the Undercover Officer, in which he invited the Undercover Officer to view a lecture entitled “The Manhaj of Establishing the Shariah.”

13. On or about December 1, 2016, in New York County, the defendant sent an email to the Undercover Officer, in which he invited the Undercover Officer to view a lecture entitled “The Manhaj of Establishing the Shariah.”

14. On or about December 2, 2016, in New York County, the defendant sent a series of messages to the Undercover Officer, in which the defendant stated in substance that he would assist the Undercover Officer to travel to join ISIL.

15. On or about December 4, 2016, through on or about December 5, 2016, in New York County, the defendant sent a series of messages to the Undercover Officer, which contained media reports about ISIL.

16. On or about December 5, 2016, in New York County, the defendant had a conversation with the Undercover Officer, in which the defendant offered to assist the Undercover Officer to travel to join ISIL and provided instructions.

17. On or about December 5, 2016, in New York County, the defendant sent a series of messages to the Undercover Officer, in which the defendant stated in substance, “I can link u to someone there . . . I don’t want U to talk to anyone in dawla from where u are it’s too risky . . . I don’t like talking about D online bcs the kuffaar will read our text.”

18. On or about December 6, 2016, in New York County, the defendant sent a series of messages to the Undercover Officer which contained media reports from “Amaq Agency” describing ISIL’s operations.

19. On or about December 6, 2016, in New York County, the defendant sent a series of messages to the Undercover Officer, in which the defendant stated in substance that he would assist the Undercover Officer to travel to join ISIL, and the defendant requested the Undercover Officer’s pedigree information.

20. On or about December 12, 2016, in New York County, the defendant had a conversation with the Undercover Officer, in which the defendant stated in substance that he had a plan “A” and a plan “B” to assist the Undercover Officer to travel to join ISIL.

21. From on or about December 21, 2016, through on or about December 22, 2016, the defendant sent a series of messages to the Undercover Officer, in which the defendant recommended two individuals residing outside of the United States (Co-Conspirator No. 1 and Co-Conspirator No. 2) who could assist the Undercover Officer to travel to join ISIL.

22. From on or about December 21, 2016, through on or about December 22, 2016, the defendant sent a series of messages to the Undercover Officer, in which the defendant told the Undercover Officer that it would be easier for the Undercover Officer to travel with a brother to “D” from the United Kingdom and have a “holiday in Turkey.”

23. From on or about December 21, 2016 through on or about December 22, 2016, the defendant sent a series of messages to the Undercover Officer, in which the defendant instructed the Undercover Officer not to “discuss D over the fone.”

24. On or about December 25, 2016, Co-Conspirator No. 1 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 1 offered to assist the Undercover Officer to travel to join ISIL.

25. On or about December 26, 2016, the defendant sent a series of messages to the Undercover Officer, in which the defendant stated in substance that he would assist the Undercover Officer to travel to join ISIL.

26. On or about December 30, 2016, the defendant sent a series of messages to the Undercover Officer, in which the defendant recommended an individual residing outside of the United States (Co-Conspirator No. 3) who could assist the Undercover Officer to travel to join ISIL.

27. On or about December 30, 2016, the defendant sent a series of messages to the Undercover Officer, in which the defendant instructed the Undercover Officer not to “discuss the D on the fone” and that “many pple got arrested just from text messages.”

28. On or about January 15, 2017, the defendant sent a message to the Undercover Officer, which stated in substance, “do you want the cell number of the brother u can marry.”

29. On or about January 16, 2017, the defendant sent a message to the Undercover Officer, which stated in substance, “I will text u soon.”

30. On or about January 17, 2017, the defendant sent a message to the Undercover Officer, which stated in substance, “I will text u soon don’t worry.”

31. On or about January 17, 2017, the defendant sent a series of messages to the Undercover Officer, in which the defendant provided the name and phone number of an individual (Co-Conspirator No. 4), who would assist the Undercover Officer to travel to join ISIL.

32. On or about January 17, 2017, the defendant sent a series of messages to the Undercover Officer, which stated in substance that, “he [Co-Conspirator No. 4] will respond when he has net . . . he’s in D.”

33. On or about January 22, 2017, through on or about January 23, 2017, the defendant sent a series of messages to the Undercover Officer, which he stated in substance, “he [Co-Conspirator No. 4] said he spoke to u.”

34. On or about January 23, 2017, the defendant sent a message to the Undercover Officer, which stated in substance, “he’s in R.”

35. On or about January 24, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, which stated in substance, “I live in R.”

36. On or about January 26, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which he stated in substance that he [Co-Conspirator No. 4] can help get the Undercover Officer into to ISIL.

37. On or about January 26, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 4 requested a photo of the Undercover Officer and sent a photo of himself.

38. On or about January 28, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, which stated in substance that he can “help.”

39. On or about January 28, 2017, Co-Conspirator No. 4 left a voicemail message for the Undercover Officer, in which Co-Conspirator No. 4 stated in substance that he will assist the Undercover Officer to travel to join him.

40. On or about January 28, 2017, Co-Conspirator No. 4 left a voicemail message for the Undercover Officer, in which Co-Conspirator No. 4 provided the Undercover Officer with instructions.

41. On or about January 30, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 4 stated in substance that he will speak to his contacts in order to assist the Undercover Officer.

42. On or about January 31, 2017, Co-Conspirator No. 4 left a voicemail message for the Undercover Officer, in which Co-Conspirator No. 4 stated in substance that he spoke to a brother about getting the Undercover Officer in to join ISIL and that there is still a way.

43. On or about February 1, 2017, Co-Conspirator No. 4 left a voicemail message for the Undercover Officer, in which Co-Conspirator No. 4 stated in substance that someone from the “office” would contact the Undercover Officer and arrange for travel and housing upon arrival.

44. On or about February 2, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 4 gave the Undercover Officer instructions on “security measures,” and stated in substance that Co-Conspirator No. 4 had provided the Undercover Officer’s “details” to the office.

45. On or about February 2, 2017, Co-Conspirator No. 4 left a voicemail for the Undercover Officer, in which Co-Conspirator No. 4 described the fighting, instructed the Undercover Officer to be prepared for anything, and stated in substance that “now is the time to come . . . we need people in the medical field.”

46. On or about February 3, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 4 informed the Undercover Officer that an ISIL official would contact the Undercover Officer.

47. On or about February 3, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 4 instructed the Undercover Officer to delete the prior voicemail.

48. On or about February 4, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 4 directed the Undercover Officer to send a photo.

49. On or about February 4, 2017, Co-Conspirator No. 4 sent a series of messages to the Undercover Officer, in which Co-Conspirator No. 4 directed the Undercover Officer to delete the photos Co-Conspirator No. 4 had sent and to not say incriminating things.

COUNT TWO:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant TREVOR WILLIAM FORREST, a/k/a “SHAIKH ABDULLAH FAISAL,” a/k/a “SHAIKH FAISAL,” of the crime of **SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE AS A CRIME OF TERRORISM**, in violation of Penal Law §§ 490.15 and 490.25(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about July 13, 2014, to on or about February 22, 2017, with intent to intimidate and coerce a civilian population, influence the policy of a unit of government by intimidation and coercion, and affect the conduct of a unit of government by murder, assassination and kidnapping, committed the specified offense of Soliciting or Providing Support for an Act of Terrorism in the First Degree, in violation of Penal Law § 490.15, in that, with such intent and with intent that material support and resources be used, in whole and in part, to plan, prepare, carry out and aid in an act of terrorism, as defined in Penal Law § 490.05, the defendant raised, solicited, collected and provided material support and resources, to wit, personnel, and the value of the material support and resources exceeded one thousand dollars.

COUNT THREE:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant TREVOR WILLIAM FORREST, a/k/a “SHAIKH ABDULLAH FAISAL,” a/k/a “SHAIKH FAISAL,” of the crime of **SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE**, in violation of Penal Law § 490.15, committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about July 13, 2014, to on or about February 22, 2017, with intent that material support and resources be used, in whole and in part, to plan, prepare, carry out and aid in an act of terrorism, as defined in Penal Law § 490.05, raised, solicited, collected and provided material support and resources, to wit, personnel, and the value of the material support and resources exceeded one thousand dollars.

COUNT FOUR:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant TREVOR WILLIAM FORREST, a/k/a “SHAIKH ABDULLAH FAISAL,” a/k/a “SHAIKH FAISAL,” of the crime of **ATTEMPTED SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE AS A CRIME OF TERRORISM**, in violation of Penal Law §§ 110/490.15 and 490.25(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about November 29, 2016, to on or about February 22, 2017, with intent to intimidate and coerce a civilian population, influence the policy of a unit of government by intimidation and coercion, and affect the conduct of a unit of government by murder, assassination and kidnapping, committed the specified offense of Attempted Soliciting or Providing Support for an Act of Terrorism in the First Degree, in violation of Penal Law §§ 110/490.15, in that, with such intent and with intent that material support and resources be used, in whole and in part, to plan, prepare, carry out and aid in an act of terrorism, as defined in Penal Law § 490.05, the defendant attempted to raise, solicit, collect and provide material support and resources, to wit, personnel, and the value of the material support and resources exceeded one thousand dollars.

COUNT FIVE:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant TREVOR WILLIAM FORREST, a/k/a “SHAIKH ABDULLAH FAISAL,” a/k/a “SHAIKH FAISAL,” of the crime of **ATTEMPTED SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE**, in violation of Penal Law §§ 110/490.15, committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about November 29, 2016, to on or about February 22, 2017, with intent that material support and resources be used, in whole and in part, to plan, prepare, carry out and aid in an act of terrorism, as defined in Penal Law § 490.05, attempted to raise, solicit, collect and provide material support and resources, to wit, personnel, and the value of the material support and resources exceeded one thousand dollars.

CYRUS R. VANCE, JR.  
District Attorney

GJ #1A-15

Filed:

NA

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

TREVOR WILLIAM FORREST,  
a/k/a "SHAIKH ABDULLAH FAISAL,"  
a/k/a "SHAIKH FAISAL"

Defendant.

---

INDICTMENT

CONSPIRACY IN THE FOURTH DEGREE AS A CRIME OF TERRORISM, P.L. §§ 105.10(1) and 490.25(1), 1 Ct  
SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE, AS A CRIME OF TERRORISM, P.L. §§  
490.15 and 490.25(1), 1 Ct  
SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE, P.L. § 490.15, 1 Ct  
ATTEMPTED SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE, AS A CRIME OF  
TERRORISM, P.L. §§ 110/490.15 and 490.25(1), 1 Ct  
ATTEMPTED SOLICITING OR PROVIDING SUPPORT FOR AN ACT OF TERRORISM IN THE FIRST DEGREE, P.L. §§ 110/490.15, 1 Ct

---

CYRUS R. VANCE, JR., District Attorney

A True Bill

Deborah Hickey  
David Stuart  
RAC

Foreman