

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 21-20109-CR-KING/BECERRA

UNITED STATES OF AMERICA

v.

**JIHAD MOHAMMED ALI,
a/k/a, "Abu Dujanah,"**

Defendant.

_____ /

FACTUAL PROFFER

The United States of America and Jihad Mohammed Ali (the "Defendant"), personally and through his attorney, agree that the following statements are true and accurate and serve as the factual basis for the Defendant to enter a plea of guilty, and could have been proven beyond a reasonable doubt if this case went to trial:

At all times relevant to the criminal Information in this case, the Islamic State of Iraq and al-Sham ("ISIS") was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, and the Defendant knew that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity and that the ISIS engages and has engaged in terrorism.

On March 15, 2015, the Defendant traveled with his family from Trinidad and Tobago to Brazil, with an intended ultimate destination of Syria. Shortly after arriving in Brazil, the Defendant travelled to Turkey, where the Defendant eventually ran across the Turkey-Syria border to enter Syria. Between March and July 2015, the Defendant lived in Manbij, Syria, while the Defendant awaited ISIS training. Between in or around September and November 2015, the

Defendant attended ISIS religious and military training in Tabqa, Syria, with other English speakers, that included training on the operation of various weapons including the AK-47 assault rifle, PKC machine gun, and rocket-propelled grenade launcher.

Between in or around September and November 2015, after the Defendant completed ISIS religious and military training, the Defendant joined the Anwar al-Awlaki katibah or battalion.

In or around the summer of 2018, in Shamiyah, Syria, the Defendant conducted a mission on behalf of ISIS to retrieve a suitcase containing laptops and supplies left inside a house. Thereafter, while departing from Shamiyah, Syria with the suitcase, the Defendant fired his AK-47 assault rifle at ground forces attacking ISIS from a street outside of the house.

In or around 2018, in Gharanij, Syria, the Defendant fired his weapon on behalf of ISIS against U.S.-led coalition forces and against a local tribe that opposed ISIS and at a different time, the Defendant fired his weapon in the air at a U.S. coalition force A-10 aircraft. At some point during 2018, while still living in Gharanij, Syria, the Defendant became an Idari (manager) of supplies for an ISIS battalion after he was appointed by the battalion's Emir (leader).

Thereafter, between November 30, 2018, and on or about March 17, 2019, while in Baghuz, Syria, the last ISIS stronghold before ISIS's defeat in Syria, the Defendant fought on behalf of ISIS, firing his weapon against U.S.-led coalition forces.

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY

Date: 4/28/2021

By:



JONATHAN D. STRATTON
ASSISTANT UNITED STATES ATTORNEY

Date: 3/15/21



MICHAEL HURSEY
ATTORNEY FOR DEFENDANT

Date: 3/15/21



JIHAD ALI
DEFENDANT