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ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
FEB 14 2018
CLERK, U.S. DISTRICT COURT
By *[Signature]*
Deputy

UNITED STATES OF AMERICA

v.

SAID AZZAM MOHAMAD RAHIM

No. 3:17-CR-169-B

**Supersedes Indictment Returned on
March 22, 2017.**

SUPERSEDING INDICTMENT

The Grand Jury Charges:

ISLAMIC STATE OF IRAQ AND AL-SHAM

At all relevant times, there existed a foreign terrorist organization known as, among other names, the Islamic State of Iraq and al-Sham (“ISIS”). ISIS’s publicly stated purpose is the establishment of an Islamic state or caliphate based in the Middle East and Africa that encompasses all Muslims worldwide.

ISIS has pursued the objective of an Islamic state through, among other things, indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of their religion, nationality, or ethnicity, kidnapping of civilians, forced displacement of Shia communities and minority groups, killing and maiming of children, rape, and other forms of sexual violence. ISIS has recruited thousands of foreign fighters from across the globe to assist with its efforts to expand its so-called caliphate in Iraq, Syria, and other locations in Africa and the Middle East, and has leveraged technology to spread its violent

extremist ideology and for incitement to commit terrorist acts.

On or about October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (AQI), then known as Jam ‘at al Tawid wa’ al-Jahid, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (“ISIS”), The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production.

On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

Among the methods employed and activities undertaken by ISIS’s members and associates are the following:

- a. ISIS members and associates solicit, organize, and carry out acts of violence, intimidation, and threats, including murders, suicide bombings, and kidnappings, and solicit and cause others to do so, with the intent to establish a global

Islamic state.

b. ISIS members and associates make and disseminate recruiting materials and propaganda encouraging others to join ISIS and personally participate in acts of violence, including in suicide attacks, materials which are distributed over the Internet to increase and further the public perception of ISIS as a terrorist organization. These materials include propaganda designed to encourage ISIS followers to commit acts of violence. For example, the July 2016 issue of Dabiq, ISIS's then-official magazine, praised the "brother" who answered "the Islamic State's calls to target nations participating in the Crusader coalition fighting the Caliphate" by "killing more than 80 people and injuring more than 300 others" with a truck in an attack that occurred in Nice, France, on or about July 14, 2016.

c. ISIS members and associates make and disseminate recruiting materials and propaganda encouraging others who are unable to travel to the Middle East to instead conduct attacks in other countries. For example, on or about March 31, 2015, the user of Twitter account @AbuHu55ain_, believed to be used at the time by an ISIS member located in Syria, tweeted: "Lone Wolfs Rise Up"; "If you can't make the hijrah [i.e., travel to the Middle East], dont sit at home & give up . . . ignite a bomb, stab a kaffir [i.e., the disbelievers or non-Muslims], or shoot a politican!"; "if you came here, you'd be on the frontline fighting, right? But u couldn't come here, so why not fight the kuffar over there?"; and "i always see in the media brothers getting caught making hijrah, brothers know that your jihad is not over just because you got stopped."

On or about September 21, 2014, now-deceased ISIS spokesperson Abu Muhammad al-Adnani called for attacks against citizens – civilian or military – of the countries participating in the United States-led coalition against ISIS. In addition, in an audio statement distributed on or about May 21, 2016, al-Adnani called for Ramadan (which corresponded to June and July 2016) to be “a month of ruin for the nonbelievers” and urged “soldiers of the caliphate in Europe and America” to carry out attacks and to target civilians, for “there are no so-called innocents.”

ISIS has disseminated a wide variety of recruiting materials and propaganda through social media. These include photographs and videos depicting ISIS's activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS, including al-Adnani and ISIS leader Abu Bakr al-Baghdadi, and members of other Islamic extremist organizations.

Count One
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim** the following question: “[H]ave you ever promoted an act of terrorism?” **Rahim** responded “No. I have been coming here since 1995. I am clean.” That statement was false in that **Rahim** then and there knew that he had promoted an act of terrorism.

In violation of 18 U.S.C. § 1001.

Count Two

False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim** the following question “Do you ever, okay, have you ever praised an act of terrorism?” **Rahim** responded “No.” That statement was false in that **Rahim** then and there knew that he had praised an act of terrorism, including the June 12, 2016 terrorist attack in Orlando, Florida, the July 14, 2016 terrorist attack in Nice, France, and the December 31, 2016 terrorist attack in Istanbul, Turkey.

In violation of 18 U.S.C. § 1001.

Count Three

False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim**, “Okay. Have you ever discussed with anyone travel for the purpose of jihad?” **Rahim** responded “No.” That statement was false as **Rahim** then and there well knew that he had discussed with other individuals travel for the purpose of jihad.

In violation of 18 U.S.C. § 1001.

Count Four
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation a federal law enforcement officer asked **Rahim**, “Have you ever been a supporter of the Islamic State, ISIL, ISIS, Daesh?” **Rahim** responded “No.” That statement was false in that **Rahim** then and there well knew that he has been and was a supporter of ISIS (a/k/a the Islamic State, ISIL or Daesh).

In violation of 18 U.S.C. § 1001.

Count Five
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim**, “Have you ever promoted violence on behalf of the Islamic State, ISIS, ISIL?”. **Rahim** responded “No.” That statement was false as **Rahim** then and there well knew that he had promoted violence on behalf of ISIS, a/k/a the Islamic State, or ISIL.

In violation of 18 U.S.C. § 1001.

Count Six
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim**, “. . . Okay. Have you yourself ever encouraged anyone to follow [the] guidance of Abu Mohammed Al Adnani, including his instruction to kill infidels without consultation or permission?” **Rahim** responded “No, no.” That statement was false in that **Rahim** then and there well knew that he had encouraged people to follow the guidance of Abu Mohammand Al-Adnani, including Al-Adnani’s instructions to kill.

In violation of 18 U.S.C. § 1001.

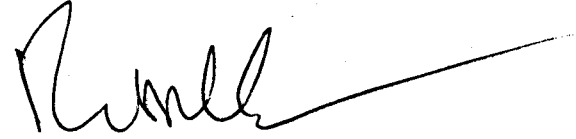
Count Seven

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

Beginning in or around October 2014 and continuing through March 2017, in the Northern District of Texas and elsewhere, the defendant, **Said Azzam Mohamad Rahim**, did knowingly attempt to provide material support or resources, including services and personnel, to a foreign terrorist organization, namely ISIS, knowing that ISIS is a designated terrorist organization and that ISIS has engaged, and engages in, terrorist activity and terrorism.

In violation of 18 U.S.C. §§ 2339B and 2.

A TRUE BILL



FOREPERSON

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v.

SAID AZZAM MOHAMAD RAHIM (01)

SUPERSEDING INDICTMENT

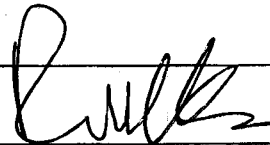
18 U.S.C. § 1001
False Statement to a Federal Agency
6 COUNTS

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

A true bill rendered

FORT WORTH

Filed in open court this 14th day of February, 2018.



FOREPERSON

Defendant in Federal Custody since 03/06/2017.



UNITED STATES MAGISTRATE JUDGE