

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.

3. 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.

4. 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” – which is how the FTO will be referenced herein), 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.

5. On 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.

6. 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.

7. On or about September 21, 2014, then-ISIL 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.

8. ISIS has and continues to recruit individuals throughout the world, including individuals from the United States and other western countries, to engage in acts of terrorism. As part of its recruiting efforts, ISIS has used the internet and various social media platforms to publicize its military and terrorist activities. In its effort to draw in potential recruits, ISIS has published video recordings and photographs of its forces in action, articles designed to justify its fight to establish the caliphate, and issued other materials to encourage others to join its ranks.

9. Based on open source information, ISIS has murdered by beheading civilians/non-combatants from the United States, Great Britain, France, and Japan, among others, and has reportedly murdered dozens of people at a time, carried out public executions, and committed other brutal and terrorist acts. ISIS has created and published video recordings of these activities as part of their recruitment efforts, designed to encourage individuals to commit terrorist acts themselves.

Overview of the Defendant's Conduct

1. Between in and around January, 2017, and June 15, 2017, as part of the defendant AZIZ IHAB SAYYED's attempt to provide personnel and services to ISIS:

A. Defendant AZIZ IHAB SAYYED (SAYYED) obtained and viewed ISIS propaganda videos of the type described in paragraphs 8 and 9 of this Information. These videos depicted ISIS forces committing bombings, executions by gunshot, beheadings, and other violent acts. SAYYED shared the videos with others, narrating the video contents.

B. SAYYED expressed his support for ISIS. Among other things, SAYYED stated that ISIS was "on the right path," he displayed an ISIS flag, he possessed and shared ISIS videos, and he expressed support for ISIS attacks, which had occurred around the world.

C. SAYYED learned how to make an explosive called triacetone triperoxide ("TATP"), an extremely dangerous and highly volatile material, which is made by combining sulfuric acid, hydrogen peroxide, and acetone.

D. SAYYED acquired sulfuric acid, hydrogen peroxide, and acetone from stores in the Huntsville, Alabama area.

E. SAYYED expressed his desire to conduct attacks on police stations with TATP.

F. On or about June 13, 2017, SAYYED met with a person he understood to be an ISIS member. During this meeting, SAYYED and the other person discussed, among other things, the danger of TATP, ISIS's preference for the use of certain explosives, and SAYYED's desire to assist ISIS. During this meeting, SAYYED offered himself as personnel to the person he understood to be a member of ISIS.

Count One
Attempting to Provide Material Support or Resources
to a Designated Foreign Terrorist Organization
18 U.S.C. § 2339B

1. Beginning on a date unknown, but no later than on or about January 1, 2017, and continuing until on or about June 15, 2017, in Madison County, within the Northern District of Alabama and elsewhere, the defendant,

AZIZ IHAB SAYYED,

knowingly attempted to provide material support or resources, including services and personnel, to a foreign terrorist organization, namely ISIS, knowing that ISIS was a designated foreign terrorist organization and that ISIS engages in and has engaged in terrorist activity and terrorism, in violation of 18 U.S.C. § 2339B.

JAY E. TOWN
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/s/ Electronic Signature _____
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