

UNITED STATES DISTRICT COURT

for the

Southern District of Alabama

United States of America
v.
Mohammad Abdul Rahman Abukhdair and
Randy Wilson, aka
Rasheed Wilson

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Case No. MS 12-0210-N

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October, 2010 through the present in the county of Mobile in the Southern District of Alabama, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2339A	Providing material support to terrorists
18 U.S.C. § 1542	False statement in application and use of passport

This criminal complaint is based on these facts:

See attached Affidavit, incorporated herein by reference.

Continued until the return and correct copy of the original.
 Charles R. Diard, Jr.
 U.S. District Court
 Southern District of Alabama
 Deputy Clerk
 Date 12-11-12

Complainant's signature

Steven E. Sorrells, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: December 10, 2012

Judge's signature

City and state: Mobile, Alabama

Katherine P. Nelson, United States Magistrate Judge

Printed name and title

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Steven E. Sorrells, being of sound mind and body, do solemnly state as follows:

1. From August 1998 through the present, I have been employed as a Special Agent for the Federal Bureau of Investigation. From June 1999 until August 2010, I served as a Special Agent assigned to the Joint Terrorism Task Force in the New York Division.

2. Since August 2010, I have been assigned to the Joint Terrorism Task Force in the Mobile Division serving as either a Special Agent or an Acting Supervisory Special Agent. In this capacity, my primary duty is investigating matters of international and domestic terrorism. I have been a lead investigator on more than fifty international terrorism investigations in the United States and overseas, and have received extensive training in this area. For approximately one and a half years, I served as the Acting Supervisory Special Agent for the squad currently handling the Randy Wilson and Mohammad Abukhdair investigations. I currently serve as a Special Agent on the same squad

3. This affidavit is made in support of a criminal complaint charging both Randy Wilson, *a.k.a.* "Rasheed" Wilson and Mohammad Abukhdair with (1) conspiring to provide material support to terrorists, knowing or intending that it is to be used in preparation for, or in carrying out, a violation of 18 U.S.C. § 956 (conspiracy to kill persons or damage property outside the United States), in violation of 18 U.S.C. § 2339A; and (2) charging Abukhdair with passport fraud, in violation of 18 U.S.C. § 1542. These charges all stem from Wilson and Abukhdair's conspiracy to travel from the United States to Mauritania intending to prepare to wage violent jihad.

4. This affidavit is also made in support of the arrest warrants for both Wilson and Abukhdair based on these charges.

5. The information contained within this affidavit is either personally known to me or was provided to me by other members of law enforcement involved in the investigation of the matter described below. Since this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Wilson and Abukhdair have violated the federal laws identified above.

THE DEFENDANTS

6. Randy Wilson, a.k.a. "Rasheed" Wilson, is a United States citizen born in Mobile, Alabama on March 30, 1987. Wilson was a close friend, and the former roommate, of Omar Hammami.¹ He resides in Mobile, Alabama with his wife and two small children and works various jobs around the Mobile area.

7. Mohammad Abdul Rahman Abukhdair is a United States citizen born in Syracuse, New York on October 3, 1987. Abukhdair moved to Cairo, Egypt in February 2007 to study Arabic. In February 2010, Abukhdair moved from Cairo to Alexandria, Egypt. In November 2010, Abukhdair and his roommates in Alexandria were arrested by Egyptian authorities on suspicion of being involved with a terrorism group in Egypt. Abukhdair was imprisoned in Egypt for two months and then deported back to the United States in January 2011. Upon his return to the United States, Abukhdair lived in South Carolina and Ohio, before coming to Mobile, Alabama in late October 2011. Abukhdair is not married, has no children, and is unemployed.

¹ Daphne native Omar Hammami traveled to Somalia in 2006 where he allegedly joined the al-Shabaab. On February 26, 2008, the United States Secretary of State designated al Shabaab as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act, as amended, and as a Specially Designated Global Terrorist under Section 1(b) of Executive Order 13224, as amended. Hammami has been indicted on terrorism charges in the Southern District of Alabama. On November 14, 2012, Hammami was placed on the FBI's "Most Wanted Terrorists" list.

SUMMARY

8. The proposed complaint charges Wilson and Abukhdair with conspiracy to provide material support, knowing or intending that it is to be used in preparation for, or in carrying out, a violation of 18 U.S.C. § 956 (conspiracy to kill persons or damage property outside the United States), in violation of 18 U.S.C. § 2339A. In addition, the proposed complaint charges Abukhdair with providing false information in a United States passport application in violation of 18 U.S.C. § 1542. There is probable cause to establish that Wilson and Abukhdair conspired to travel overseas with the intent of participating in violent jihad.

9. On December 11 and 13, 2012, Wilson and Abukhdair, respectively, expect to travel to Casablanca, Morocco. Once in Morocco, Wilson and Abukhdair intend to travel to Mauritania, a location they believe will place them in close proximity to jihadi conflict. During the course of the conspiracy, Wilson and Abukhdair discussed many possible travel routes, however, their ultimate goal of engaging in violent jihad remained constant. While the discussion of possible travel routes varied throughout the course of the conspiracy, Wilson recognized that, to achieve their goal, the final destination had to be a country that they believed positioned them in close proximity to jihadi conflict. Their current travel plans further their conspiratorial goal of ultimately being in a location where they could immediately join an existing violent jihadi conflict or, in the alternative, to travel to a country where they anticipated a violent jihadi conflict would occur in the near future, thereby enabling them to join the conflict at its origin. The evidence also establishes probable cause to believe that Wilson and Abukhdair's understanding and belief that "violent jihad" meant killing, maiming or injuring persons outside the United States.

VIOLATIONS BEING COMMITTED

10. Title 18 U.S.C. Section 2339A - Providing material support to terrorists, provides in pertinent part:

(a) Offense. – Whoever provides material support or resources or conceals or disguises the nature, location, source, or ownership of material support or resources, knowing or intending that they are to be used in preparation for, or in carrying out, a violation of section . . . 956² . . . shall be fined under this title, imprisoned not more than 15 years, or both, and if the death of any person results, shall be imprisoned for any term of years or for life.

Title 18 U.S.C. Section 1542 - False statement in application and use of passport states, in pertinent part:

(a) Whoever willfully and knowingly makes any false statement in an application for passport with intent to induce or secure the issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws . . . shall be fined under this title, imprisoned not more than 25 years (if the offense was committed to facilitate an act of international terrorism), or both.

THE CONSPIRACY

11. Wilson and Abukhdair met online in 2010 while Wilson was living in Mobile, Alabama and Abukhdair was living in Alexandria, Egypt. On August 27, 2011, an FBI Undercover Employee (“UCE”) met Wilson for the first time at Wilson’s place of employment. During this encounter, and during later meetings between the UCE and the defendants, the UCE consensually recorded their communications. Based on the discussions between Wilson,

² 18 U.S.C. § 956 provides, in pertinent part, “(a)(1) Whoever, within the jurisdiction of the United States, conspires with one or more other persons, regardless of where such other person or persons are located, to commit at any place outside the United States an act that would constitute the offense of murder, kidnapping, or maiming if committed in the special maritime and territorial jurisdiction of the United States shall, if any of the conspirators commits an act within the jurisdiction of the United States to effect any object of the conspiracy, be punished as provided in subsection (a)(2). . . (b) Whoever, within the jurisdiction of the United States, conspires with one or more persons, regardless of where such other person or persons are located, to damage or destroy specific property situated within a foreign country and belonging to a foreign government or to any political subdivision thereof with which the United States is at peace, or any railroad, canal, bridge, airport, airfield, or other public utility, public conveyance, or public structure, or any religious, educational, or cultural property so situated, shall, if any of the conspirators commits an act within the jurisdiction of the United States to effect an object of the conspiracy, be imprisoned not more than 25 years.”

Abukhdair and the UCE throughout the investigation, it is clear that Wilson and Abukhdair had formulated a plan to travel together overseas for the purpose of waging violent jihad prior to Wilson meeting the UCE on August 27, 2011. Indeed, only several days after first meeting, Wilson told the UCE about his desire to make hijrah³ to a Muslim country and specifically identified Mauritania and Egypt as possible destinations.

12. On September 16, 2011, Wilson told the UCE about his connection to Omar Hammami, and explained that the FBI “*has eyes*” on people in Mobile because of Hammami. Wilson first met Hammami in 2002 and lived with Hammami in Mobile, Alabama from May through December of 2004. At a later meeting on September 17, 2011, Wilson described Hammami as a friend and showed the UCE an al-Qaeda video on his laptop praising jihad and the downfall of the West.

13. Throughout the investigation, Wilson, Abukhdair and the UCE spent hours watching videos depicting Islamic extremist propaganda, bombings, lectures on violent jihad, and videos of prominent Al Qaeda leaders including Osama bin Laden, Anwar al-Aulaqi, and Ayman al-Zawahiri. They also viewed mujahideen guerilla training, nasheeds (Islamic themed songs) with violent themes, videos of prisoner beheadings and bodily mutilations of the dead including children, and adult soldiers. Wilson and Abukhdair’s viewing habits have escalated in frequency, intensity and graphic nature since the initiation of the investigation.

14. On October 2, 2011, Wilson told the UCE that he and Abukhdair were conspiring to travel to Sudan and then Somalia. Wilson stated that he and Abukhdair had considered traveling to other countries but that Sudan was currently their top choice interim country because they believed traveling to Sudan would not raise the authorities’ suspicions and that they would be able to travel from Sudan to Somalia. During this conversation, the UCE asked what would

³ Hijrah is Arabic for emigration. This term can mean simply emigrating to a Muslim country. However, a Confidential Human Source, (“CHS”), who has known Wilson for many years and had previously conspired with Wilson to travel to Somalia to engage in jihad, has reported that Wilson often uses the term “hijrah” to indicate violent jihad.

happen to their families if something happened to the UCE and Wilson. Wilson told the UCE that they need not worry about this because if somebody “*dies to shaheed*”⁴ in “*the Arab world*” your family has “*status*” and they are taken care of by the community.

15. On October 4, 2011, Wilson and the UCE agreed to use code words when discussing their travel plans, specifically that they would use the code words “*Nevada*,” “*San Francisco*,” and “*San Diego*” when discussing Nigeria, Sudan, and Somalia, respectively. Wilson also told the UCE that he and Abukhdair already use the code word “*study*” when referring to “*it*.” In response, the UCE stated, “*Right, for jihad, yeah*.” Wilson neither verbally confirmed nor corrected the UCE on this point. Your affiant understands the use of code words to be an example of Wilson’s “operational security” which he employs in various ways throughout the conspiracy. Wilson also explained that he has a lot to offer the mujahideen⁵ in their fight against America and the West, because he knows America’s weaknesses.

16. On October 29, 2011, Wilson drove to Cleveland, Ohio, picked up Abukhdair and brought him back to Mobile, Alabama where Abukhdair moved in with Wilson and his family. Several days later, Abukhdair met with Wilson and the UCE and discussed the two months he spent in an Egyptian prison and that he believed Allah protected him by causing the Egyptian Intelligence agents to miss the jihadist material on his computer. Abukhdair also told Wilson and the UCE about an Egyptian Sheik who suggested he forget about fighting jihad and return to the United States to give dawah⁶ instead. Abukhdair said the Sheik was wrong and explained that the end goal for Islam was to take over the world, and that jihad was the means of achieving this goal. Furthermore, Abukhdair stated that Islam was not spread by dawah, but rather by the

⁴ “Shaheed” means “witness” in Arabic, and it is used as an honorific title for Muslims who died fighting in defense of Islam, country, or family. Wilson and Abukhdair use this term to mean martyr.

⁵ “Mujahideen” means “fighter” in Arabic. Wilson and Abukhdair used this term to mean a jihadist or someone who is engaged in a fight for Islam.

⁶ Giving dawah is a rough Islamic equivalent to evangelizing.

sword of jihad. Wilson and Abukhdair agreed that Usama bin Laden⁷ and Anwar Aulaqi⁸ were great Muslims for giving up their lives of luxury to pursue jihad. Finally, Abukhdair indicated his desire to get a new passport because he believed the Egyptian visa stamps in his current passport would raise suspicion when they traveled.

17. On November 1, 2011, Wilson told the UCE that he and Abukhdair have been discussing ways to finance their travel. Wilson and Abukhdair discussed methods of raising money necessary to finance their travel, including attempting to sell his minivan and possibly waiting for Wilson's tax return. In addition to selling personal items, they discuss committing crimes to raise money, including specifically conducting a burglary of a car dealership, robbing drug dealers and the home invasion of a local businessman.

18. Of particular note, during this November 1, 2011, conversation, Wilson asked the UCE if he/she has a credit card. When the UCE responded affirmatively, Wilson suggested using the UCE's credit card to pay for their flight overseas. According to Wilson, since they were not coming back to the United States, they would never have to pay the credit card bill. Thus, under Wilson's plan, the tickets would be "free" and the money they saved could then be used for living in the interim country while they arranged travel for the next leg of their journey.

19. During this conversation, Wilson and Abukhdair's statements further evidence their understanding of jihad as violent fighting. Abukhdair told Wilson and the UCE; "*MashaAllah, I think, I think the problem is, people don't understand that, uh, jihad means people are going to die. . . . It's a war, yani. Why are you getting angry at so and so. This is what jihad is. This is what war is.*"

⁷ Usama bin Laden was the leader of al-Qaeda until his death in Pakistan on May 2, 2011.

⁸ Anwar Aulaqi, an American citizen, was an operations leader and propagandist for the Yemeni-based terrorist organization, al-Qaeda in the Arabian Peninsula, "AQAP." Aulaqi was killed in Yemen on September 30, 2011.

20. Wilson and Abukhdair continued to speak of Jihad in terms of violence. On November 9, 2011, Wilson and Abukhdair told the UCE that Sudan is still their best option. They noted that the Sudanese people love jihad and that there are already mujahideen training camps located in Sudan. Wilson explained that jihad is part of the war between Islam and kufars (often translated as 'non-believers'): *"It's not like a small war anymore. It's either we're gonna kill them and defeat them, or they're gonna kill us and defeat us."* Wilson also told the UCE how he and Abukhdair have been listening to Anwar Aulaqi's lecture *"Constants on the Path of Jihad,"* and told the UCE that Aulaqi *"was saying whenever you see the word 'terrorist,' just replace it with 'jihad.' Whenever you see the word 'terrorism,' just replace it with 'jihad.'"*

21. On December 23, 2011, Wilson, Abukhdair, and the UCE drove to the local masjid (mosque) to hear Abukhdair give the khutbah.⁹ During the drive, Abukhdair told the group that he just received his passport that his brother sent from South Carolina. During the khutbah, Abukhdair discussed how Muslims have forgotten about the struggles of persecuted Muslims around the world, especially in places like Afghanistan, Pakistan, Egypt, and Syria. Abukhdair told the listeners that Muslims can support the spread of Islam by giving dawah, paying zakat,¹⁰ and by supporting the mujahideen. He finished the khutbah by asking everyone to support the oppressed Muslims around the world. However, after giving the khutbah, Wilson and Abukhdair talked privately with the UCE about why peaceful dawah does not work and how Muslims have an obligation to spread Islam with the sword.

22. Wilson, Abukhdair, and the UCE continued to discuss ways to raise money for traveling and how they would connect with jihadi fighters during their meetings. On January 11, 2012, the UCE asked Wilson whether al-Shabaab would really take them if they just showed up

⁹ The khutbah is a sermon or lecture typically given at a masjid as part of Friday prayer.

¹⁰ Zakat is the regular giving of portion of one's income, one of five key obligations (often known as pillars) for each Muslim.

in Somalia ready to fight. Wilson believed they would receive special treatment in Somalia due to his personal connection with Omar Hammami. Several days later on January 25, 2012, Wilson explained to the UCE that *“One way or the other, everyone’s gonna have to fight. This is just, this is the way of the world, man. Don’t be so naive to think that uh, then they’re like uh, how, why are you so upset? Like jihad is the pinnacle of Islam. There’s no deed better than jihad.”*

23. On January 31, 2012, the UCE met Wilson and Abukhdair at Wilson’s apartment for the purpose of applying for passports at the post office in Daphne, Alabama. Previously, Wilson had suggested that everyone obtain two passports so that they can continue to travel if one of their passports is held by a hotel in an interim country. Before entering the post office, Wilson and Abukhdair agreed on a false story to tell the post office employee processing the applications. Wilson and Abukhdair agreed to lie about how long they have known each other and how they met. Once inside the post office, Wilson, his wife, and children, and Abukhdair applied for United States passports. Abukhdair completed an extra form explaining that his original passport was *“misplaced while moving 3 months ago.”*

24. On February 3, 2012, Wilson reiterated again to the UCE that it was his and Abukhdair’s intention to leave the United States. At this point, Abukhdair interjected that he is still unsure if he can leave the country and Abukhdair proposed that they conduct a terrorist attack in the United States instead. Abukhdair said he was losing patience, and inquired about the cost of buying six guns for a domestic attack. The UCE explained that Muslims buying that many guns would be too suspicious and risky. Wilson told the UCE to be patient, and to wait and see if their passports arrive. Not convinced, Abukhdair suggested taking hostages and demanding the release of Sheik Omar Abdel-Rahman¹¹ and Aafia Siddiqui.¹² Wilson did not

¹¹ Sheik Omar Abdel-Rahman, *a.k.a.*, “The Blind Sheik,” is the alleged mastermind of the 1993 World Trade Center Bombing. In 1995, he was convicted of several charges and sentenced to life in prison.

like Abukhdair's proposal and explained that the United States has a "*Don't-Negotiate-with-Terrorists' thing like they don't care about hostages.*" Abukhdair responded by saying that, "*Well at the very least we kill them all and it's going to make [the government] look bad if they just let all of their citizens die.*" Abukhdair also suggested that "*we just shoot it out with the police,*" or "*just fill this car with explosives and just drive it into this building.*" Abukhdair's domestic attack proposals frustrated Wilson who continued to tell Abukhdair to be patient. Later, Abukhdair told Wilson and the UCE that "*I don't know if you guys understand the greatness of jihad operation in the United States man.*" He further stated that "*the goal either way is to get to Jannah.*" Your affiant believes that this conversation further evidences Wilson and Abukhdair's intent to kill, maim or injure persons because their discussions of an alternate plan involve kidnapping and killing people. Your affiant infers from this conversation that Wilson and Abukhdair intend to use the same means of violence when they join a jihadi conflict.

25. On February 4, 2012, Wilson and Abukhdair believed that they identified an FBI surveillance vehicle parked outside of Wilson's apartment. Believing that he was the target of the surveillance, Wilson instructed his wife that if he was arrested to ask for a lawyer and not say anything. Wilson and Abukhdair immediately departed to drive to the to the UCE's apartment. On the way to the apartment, Wilson and Abukhdair stopped on the highway and threw their computers and other electronic devices into Mobile Bay. Later that night while with the UCE, Wilson and Abukhdair discussed getting their story straight in case they are arrested. Abukhdair suggested telling the FBI that they were going to Jordan to visit his mother and study Arabic. Prior to leaving, Abukhdair gave the UCE six compact disks and instructed him to destroy them. Abukhdair told the UCE that they contained Anwar Aulaqi material, and that those would be the

¹² Aafia Siddiqui was an American-educated Pakistani national. She had handwritten notes and a computer thumb drive, which contained bomb-making instructions and a list of New York City landmarks, when she was arrested in Afghanistan in 2008. While in custody, she grabbed an unattended rifle and began shooting at her interrogators. She was subsequently convicted of several crimes, including attempted murder, and sentenced to 86 years in prison.

first thing he would be questioned about if he were arrested by the FBI. An analysis of the electronic media revealed that the media contained material by Aulaqi, as well as many other texts and lectures by jihadist ideologues including Abdullah Azzam,¹³ Abu Muhammad Al-Maqdisi,¹⁴ and Abu Qatada.¹⁵

26. After considering the situation, and in an attempt to convince the FBI that they no longer wanted to travel for jihad, Wilson and Abukhdair decided to open a men's fragrance store. Wilson told the UCE that even if their passports arrived, they were not going to travel right now. On February 7, 2012, Wilson sold his minivan for \$3,900 and used the money to rent space for their store.

27. After believing they discovered FBI surveillance, Wilson and Abukhdair put their international travel plans on hold. The UCE informed Wilson and Abukhdair that s/he had decided to leave the country in March 2012 but that they could join him/her overseas. Abukhdair responded that he and Wilson may need to wait a year to travel but that they would reassess the situation if their passports arrived.

28. On February 23, 2012, Abukhdair told the UCE that he, Wilson, and Wilson's family had received their passports. Due to the perceived FBI surveillance, Abukhdair told the UCE that ". . . *we ain't traveling.*" However, Wilson immediately explained that, "*I think eventually we're cool, everything will be ok. But I don't think it's a good idea [to travel] now.*" In response to the UCE's question about how long they would wait, Wilson responded, "*At least a year.*"

¹³ Abdullah Azzam was the leader of the Arab-Afghan movement from its inception in the mid-1980s until his death in November 1989. Azzam was a mentor to Usama bin Laden during the 1980s.

¹⁴ Abu Muhammad Asem al-Maqdisi is best known for having been the spiritual mentor for Jordanian Abu Musab al-Zarqawi. Zarqawai went on to become the initial leader of al-Qaeda in Iraq, "AQI."

¹⁵ Abu Qatada is believed to have been the spiritual advisor to September 11 hijacker Mohammad Atta. He was convicted in absentia in Jordan for conspiracy to carry out terror attacks. In 2002, he was detained in the U.K. without a trial for his connection with an al-Qaeda cell in Hamburg, Germany. He has since been detained multiple times in the U.K. and is fighting extradition to Jordan.

Thereafter, the UCE confirmed that he still intended to travel overseas in the next few weeks. Afterwards, Wilson pointed out that, *“See, the thing is, the good thing is, if you travel now, especially somewhere like Sweden, you’re gonna take yourself out of a lot of danger over here. So it’s positive for you and then, and then, for us also.”* Wilson sees the UCE’s travel as potentially advantageous for he and Abukhdair, because the UCE would be established overseas when Wilson and Abukhdair were ready to travel.

29. On March 27, 2012, the UCE visited Wilson and Abukhdair at their new men’s fragrance business. After receiving money from Abukhdair’s father and Wilson’s step-father, they signed a three-year lease. In response to a question by the UCE, Wilson explained that they believed that signing a three-year lease would convince the FBI that Wilson and Abukhdair had abandoned their plans to travel for jihad. Wilson and Abukhdair operated the men’s fragrance store from March 2012 through June 2012 but, due to lack of business, the store was closed in July 2012.

30. On June 4, 2012, a mutual friend of both Wilson and Omar Hammami attempted to board an international flight for a business trip. After learning that s/he was unable to fly, s/he was interviewed by the FBI and agreed to become a Confidential Human Source (“CHS”) for the FBI. During interviews with the FBI, the CHS explained that s/he thought about leaving the United States with Hammami in 2006, but did not do so because the timing was not right. After Hammami left, the CHS spent more time with Wilson during which time they watched Aulahi videos and martyrdom videos from Bosnia and Chechnya. Wilson also e-mailed videos to the CHS depicting Muslim women and children being raped and killed.

31. The CHS admitted that s/he had previously conspired with Wilson to travel to Somalia and wage violent jihad with al-Shabaab.¹⁶ According to the CHS, Wilson equates jihad with fighting and has previously expressed his support for suicide attacks even if the targets

¹⁶ See Note 1, *supra*, for a description of al-Shabaab.

included innocent women and children. Wilson spoke of the deaths of innocent women and children as collateral damage. According to the CHS, they discussed several countries by which they could transit through en route to Somalia, but their ultimate goal was to travel to Somalia for the purpose of joining Hammami and waging violent jihad with al-Shabaab. This conspiracy ultimately failed. The CHS realized Wilson's extremist view of Islam did not comport with his/her own views and the CHS became suspicious of Abukhdair and believed that he might be an FBI informant.

32. On July 13, 2012, the CHS met with Wilson for the first time since the CHS agreed to assist the FBI. Meetings between the CHS and Wilson or Abukhdair were consensually recorded. During a subsequent meeting, the CHS asked if their defunct plan to sail to Somalia had been a bad idea. Wilson responded that it was not a bad idea, but that it would not currently work due to the heavy U.S. naval presence off the Somali coast. Wilson also told the CHS about al-Qaeda's influence in Mali, and explained that the coup in Mali may affect entry into neighboring Mauritania.

33. On September 7, 2012, Wilson met again with the CHS. They discussed the possibility of Abukhdair's inability to fly due to his deportation from Egypt and of their belief that the FBI had been surveilling them. Wilson admitted that they had opened the men's fragrance store in an attempt to convince the FBI that they no longer intended to travel. Wilson also acknowledged that he and Abukhdair committed a crime when Abukhdair lied on his passport application.

34. During this meeting, Wilson informed the CHS that he and Abukhdair were in an agreement to travel to a European country, and from there to a country near a jihadi conflict that they could join. Immediately thereafter, Wilson discussed possibly traveling to Tunisia and the presence of training camps nearby in Libya. Wilson provided advise on traveling, counseling the

CHS to travel first to a European country and then to a Muslim country in order to avoid suspicion.

35. On September 16, 2012, Wilson and the CHS embarked on a fishing trip to Dauphin Island. During the trip, Wilson told the CHS that he and Abukhdair had decided to travel to Mauritania from Europe, and from there they would consult with the "*Brothers*" for advice on how to link up with jihadist in the area. By the end of the trip, the CHS agreed to join Wilson and Abukhdair when they travel overseas.

36. Now a part of the conspiracy, the CHS met and spoke with Wilson throughout October 2012 to discuss means of financing their travel and to finalize their travel plans. On October 3, 2012, Wilson and the CHS discussed how much money will be needed to travel to a European country (where Wilson believed the UCE currently resided) and Wilson explained the tickets from Europe to their next destination would be paid for on the UCE's credit card. The CHS asked if s/he will need any shots before traveling. Wilson told him/her that s/he might need a yellow fever shot, but that s/he could get that in Europe.

37. On October 6, 2012, Wilson told the CHS that they were going to Mauritania. During the conversation, they discussed an Islamic university and how Wilson would rather study with the scholars out in the countryside. They also talk about what life will be like in Mauritania, about where to live, and about jobs they should get once over there.

38. On October 7, 2012, Abukhdair attempted to leave the United States on a flight to Jordan but he was turned away at the airport by the airline. Abukhdair participated in a four hour interview with Agents but never revealed his conspiracy with Wilson or his intent to engage in jihad. Abukhdair's stated purpose in traveling to Jordan was to visit his mother and acknowledged his relationship with Wilson, the UCE and others when asked about them by name. After learning that Abukhdair was not able to fly, Wilson spoke with the CHS by phone and told him that the FBI interviewed Abukhdair. According to Wilson, his name was brought

up since he paid for Abukhdair's passport. Wilson bragged to the CHS that they outsmarted the FBI because they believed the FBI was unaware that Wilson and Abukhdair had identified the FBI surveillance. According to the CHS, Wilson was not alarmed by the interview and appeared to expect it. Wilson believed that it seemed like the FBI was just fishing for information.

39. Wilson re-engaged the UCE in October 2012 and asked him/her if he/she was still willing to pay for airline tickets. On October 10, 2012, Wilson asked the UCE: "*Do you think you could pay for our tickets from here to*" Europe "*on the credit card? If so, between me and the [CHS], we can bring 10k or more in cash.*" The next day, On October 11, 2012, Wilson told the CHS, "*There are some things I want to talk to you about. I'm thinking to bypass*" Europe "*but we will talk about it. . . . I don't need to go to*" Europe "*and stay over there for months. I would rather just get to Mauri and get settled.*"

40. On October 12, 2012, the CHS and Wilson discussed saving for the trip to Mauritania and using the UCE's credit card to purchase the tickets. Wilson told the CHS that the UCE would like them to all meet in Europe [where Wilson believed the UCE was located] but that he did not like this idea, explaining that: "*I think, I think [the UCE is] like, [the UCE is] scared to go to any Muslim country without me.*" Wilson thought the UCE was playing things too safe, and he told the CHS, "*You gotta be safe, but you gotta be, you know, smart at the same time.*" Finally, Wilson, as the self-proclaimed leader of the group explained to the CHS that, "*whatever I choose to do, I can get [the UCE] to do. That's not an issue.*" The CHS asked, "*Ok, you sure?*" and Wilson responded, "*Positive. . . . But anyway, the point is, [the UCE] is gonna just listen to me. It's not a problem.*"

41. After discussing travel logistics, Wilson explained to the CHS why they were going to Mauritania. According to Wilson, the advantages of Mauritania include: (1) it is less-influenced by the West compared to other countries; (2) the Mauritanian government is weak; (3)

it is cheap to live in Mauritania; (4) there is currently no jihad being waged in Mauritania, so going their travel would not raise the authorities' suspicions; and most importantly (5) Mauritania is close to locations Wilson believes will soon emerge as new jihadist fronts, including in neighboring Mali. Wilson and the CHS also discussed how it would be impossible to get into Somalia right now. Wilson believes the beauty of his plan is that no one will suspect they are going for jihad if they do not go to an active jihadi front. Plus, then they will be well-positioned to go off and fight when jihad erupts near them.

42. On October 27, 2012, Wilson sent the UCE the information necessary to book flights for Wilson, his wife, their two children, and the CHS. Wilson and the UCE had previously discussed specific flight options. Wilson directed the UCE to buy tickets for him, his family, and the CHS to fly from the United States to Casablanca, Morocco. Wilson and Abukhdair believe that Abukhdair, having been previously not permitted to board a flight in the United States, will be permitted to fly out of Canada on a non-U.S. carrier. According to Abukhdair's instructions, the UCE purchased a flight for Abukhdair from Montreal, Canada to Casablanca, Morocco. Wilson and Abukhdair plan to rendezvous in Morocco, where the UCE will also join them. They will then travel as a group to Mauritania. The UCE purchased the tickets and sent the confirmation information to Wilson on October 31, 2012, indicating that they had been ticketed to fly to Casablanca, Morocco via Atlanta and New York on December 11, 2012. On November 11, 2012, the UCE booked a flight for Abukhdair to travel from Montreal, Canada to Casablanca, Morocco on December 13, 2012.

43. On November 16, 2012, Wilson, Abukhdair, and the CHS met in Mobile and discussed their travel plans. According to the CHS, Wilson reviewed their plan to meet in Morocco and then travel, possible by bus, to Nouakchott, Mauritania. According to the CHS, Wilson chose to travel to Mauritania because it would position them in a Muslim country near

where they believe a jihadist front will soon emerge. Wilson, Abukhdair, the CHS, and the UCE then plan to travel to the jihadist front and engage in violent jihad. To this end, they discussed traveling across the desert from Mauritania into Mali to join up with the mujahideen currently operating in northern Mali.¹⁷ They discussed bringing a flashlight for the desert, medicine, and several copies of important documents. In addition to travel plans, they discussed their joy that Omar Hammami is now on the FBI “Most Wanted Terrorists” list, and were excited that he is now even more famous. Abukhdair suggested that Hammami might even try to travel from Somalia, a diminishing jihadist front, to Mali, an emerging jihadist front.

44. On November 26, 2012, Wilson and the UCE discussed booking hotel rooms in Morocco. The UCE suggested staying near the airport since they were not going to do any sightseeing in Morocco. However, Wilson told the UCE, *“Yeah, but we need to go out and do the normal things. Don’t want to be suspicious. They are 100 percent going to send people to follow us. It’s the Moroccan way.”* Wilson also instructed the UCE that *“When they ask you in the airport just tell them tourist and you don’t plan on staying long.”*

45. Later during this conversation, Wilson responded to the UCE’s question and explained that they were still unsure how Abukhdair would get to the location for his flight. Wilson noted that they *“haven’t figured it out yet, but he will.”*

46. According to the CHS, the plan is for him/her to rent a van so that Wilson, his wife and children and the CHS can drive from Mobile, Alabama to the Hartsfield-Jackson Atlanta International Airport in Atlanta, Georgia for their departing flight to Casablanca, Morocco. They intend to leave in the overnight hours between December 10, 2012 and December 11, 2012, so that they arrive at the airport with extra time in case they are questioned.

47. On or about December 6, 2012, Wilson told the CHS that he purchased Abukhdair a

¹⁷ One of the jihadist groups currently operating in northern Mali is al-Qaeda’s North African affiliate, al-Qaeda in the Islamic Maghreb, “AQIM.”

bus ticket. Abukhdair is scheduled to leave Mobile by bus in the early morning hours of December 11, 2012 en route to Montreal, Canada. Abukhdair is scheduled to fly from Montreal to Casablanca, Morocco on December 13, 2012.

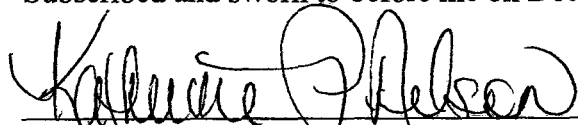
CONCLUSION

48. Based on the foregoing, there is probable cause to believe that Randy "Rasheed" Wilson and Mohammad Abukhdair have violated Title 18, United States Code, Section 2339A. There is also probable cause to believe Mohammad Abukhdair has violated Title 18, United States Code, Section 1542.



Steven E. Sorrells
Special Agent, FBI Mobile Division

Subscribed and sworn to before me on December 10th, 2012.



The Honorable Katherine P. Nelson
United States Magistrate Judge