

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

CASE NO. 13-20364-CR-UNGARO/Torres

UNITED STATES OF AMERICA

v.

GUFRAH AHMED KAUSER MOHAMMED,

a/k/a “Nasr,”

a/k/a “AuthenticTauheed1,”

a/k/a “NasrullahiKareeb,”

a/k/a “NasrullahiQareeb,”

a/k/a “Kauser Mohammed,”

a/k/a “csiter,”

a/k/a “muwahidone1,” and

MOHAMED HUSSEIN SAID,

a/k/a “Bill,”

a/k/a “Billph86,”

a/k/a “Mohammed Salem bin Abdisheikh,”

a/k/a “Mohamed Hussein,”

a/k/a “Abdul-Rahman Abdul Rahim,”

a/k/a “Tibyan,”

Defendants.

**GOVERNMENT’S THIRD
SUPPLEMENTAL NOTICE
PURSUANT TO RULE 404(B)**

Pursuant to Fed. R. Evid. 404(b), Local Rule 88.10(h), and the Standing Discovery Order, the United States of America hereby provides notice of evidence it intends to admit in its case-in-chief against Defendants Gufran Mohammed and Mohamed Said. Out of an abundance of caution, the government notes that it may not consider all of the evidence set forth below to be covered under Rule 404(b) because certain of that evidence may be either necessary to complete the narrative of the charged offenses or inextricably intertwined with evidence regarding the

charged offenses. To the extent that any of the evidence set forth below is construed to fall under Rule 404(b), it will be introduced to show intent, knowledge, plan, identity, and absence of mistake.

From in or about March 2011 through in or about January 2012, Mohammed worked with Said and an individual named Rahatul Khan, a naturalized United States citizen of Bangladeshi descent living in Texas, to facilitate the movement of an individual from the United States to Somalia, where he would join al-Shabaab or otherwise participate in violent jihad. This individual was in fact an FBI confidential human source (“CHS”). Mohammed and Khan knew each other from the Authentic Tauheed chat room, a radical Islamic online forum, where Mohammed served as the main administrator and Khan was a subordinate administrator. Mohammed and Khan used the chat room to spot and assess other participants as possible recruits for violent jihad. The CHS was one such participant.

In or about June 2011, Khan recommended the CHS to Mohammed, who recruited the CHS to travel to Somalia to wage violent jihad. The next month, Mohammed introduced the CHS to Said, described as being a contact for recruits in the United Kingdom wanting to travel to Somalia. Said explained that he had been working with al-Shabaab for a long time. Said further discussed the status of the CHS’s passport and possible travel routes to Somalia, where the CHS would join al-Shabaab. Said described the training the CHS would receive, asked whether the CHS was willing to kill civilians, and explored whether the CHS could operate within the United States. In or about August 2013, after the arrests of Mohammed and Said in the instant case, the CHS met with Khan and discussed what they would say if approached by law enforcement.

On or about June 17, 2014, Khan was arrested and charged in the United States District Court for the Western District of Texas, Case No. A-14-M-285, with conspiring to provide material support and resources to terrorists, in violation of 18 U.S.C. § 2339A(a).

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

By: /s/ Brian K. Frazier

Brian K. Frazier
Court No. A5500476
Ricardo A. Del Toro
Fla. Bar No. 597585
Assistant United States Attorneys
99 N.E. 4th Street
Miami, Florida 33132
Tel: (305) 961-9000
Fax: (305) 536-4675

Jolie F. Zimmerman
Trial Attorney, Counter-terrorism Section
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
Tel: (202) 514-1453
Fax: (202) 514-8714

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2014, I electronically filed the foregoing Government's Third Supplemental Notice Pursuant to Rule 404(b) with the Clerk of the Court using CM/ECF.

/s/ Brian K. Frazier

Brian K. Frazier