

FILED

MAY 20 2015

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF MISSISSIPPI

DAVID CREWS, CLERK
BY *J. J. [Signature]*

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:15CR 098
18 U.S.C. § 2339B(a)(1)

MUHAMMAD ODA DAKHLALLA and
JAELYN DELSHAUN YOUNG

INDICTMENT

The Grand Jury charges that:

Count One

(Conspiring to Provide Material Support to
a Designated Foreign Terrorist Organization)

From on or about May 1, 2015, and continuing through August 8, 2015, within the
Northern District of Mississippi and elsewhere, the defendants,

MUHAMMAD ODA DAKHLALLA and
JAELYN DELSHAUN YOUNG,

together, and with others known and unknown to the grand jury, knowingly did combine,
conspire, confederate, and agree together and with each other to provide “material support or
resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including
personnel, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant
(“ISIL”), which at all relevant times was designated by the Secretary of State as a foreign
terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing
that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States
Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in
section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined

in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), all in violation of Title 18, United States Code, Section 2339B(a)(1).

Count Two
(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about August 8, 2015, within the Northern District of Mississippi and elsewhere,
the defendant,

JAELYN DELSHAUN YOUNG,

a national of the United States, did knowingly attempt to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel (including herself and defendant MUHAMMAD ODA DAKHLALLA), to a foreign terrorist organization, to wit, the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), all in violation of Title 18, United States Code, Section 2339B(a)(1) and Section 2.

Count Three
(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about August 8, 2015, within the Northern District of Mississippi and elsewhere,
the defendant,

MUHAMMAD ODA DAKHLALLA,

a national of the United States, did knowingly attempt to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel (including himself and defendant JAELYN DELSHAUN YOUNG), to a foreign terrorist organization, to wit, the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), all in violation of Title 18, United States Code, Section 2339B(a)(1) and Section 2.

A TRUE BILL

/s/ Signature Redacted
FOREPERSON


UNITED STATES ATTORNEY

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AUG 26 2015

UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:15CR098
18 U.S.C. § 2339B(a)(1)

MUHAMMAD ODA DAKHLALLA and
JAELYN DELSHAUN YOUNG

PENALTIES

Counts One, Two, Three

Nm 20 years imprisonment	18 U.S.C. § 2339B(a)(1)
Up to lifetime supervised release	18 U.S.C. § 3583(e) & (j)
Nm \$250,000 fine	18 U.S.C. § 3571(b)(3)
\$100 special assessment	18 U.S.C. § 3013

CRIMINAL CASE COVER SHEET

U.S. DISTRICT COURT

Complete entire form

Place of Offense:

City Starkville
County Oktibbeha

Related Case Information

Superseding Indictment _____ Case Number _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number 3:15-MJ-32-SAA
Search Warrant Case Number _____
R20/R40 from District of _____
Related Criminal Case Number _____

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AUG 26 2015
U.S. DISTRICT COURT
STARKVILLE, MISSISSIPPI

Defendant Information

Juvenile: Yes No If yes, Matter to be sealed: Yes No

Defendant Name Muhammad Oda Dakhllalla

Alias Name _____

Address Starkville, MS 39759

DOB 1992 SS# xxx-xx-9940 Sex M Race W Nationality _____

Represented by: Gregory S. Park, Esq.

U.S. Attorney Information: AUSA Clay Joyner/Bob Norman Bar # 10316/3880

Interpreter: Yes No List Language and/or dialect: _____

Location Status:

Arrest Date 8/8/2015

- Already in Federal Custody as of 8/8/2015 (Date) in LCDC, Oxford, MS (Location)
- Already in State Custody
- On Pretrial Release

U.S.C. Citations

Total # of Counts 3 Petty Misdemeanor Felony

<u>Title & Section</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
Set 1 <u>18:2339B.F</u>	<u>Harboring or Concealing Terrorists</u>	<u>1-3</u>
Set 2 _____	_____	_____
Set 3 _____	_____	_____
Set 4 _____	_____	_____

Date: _____ Signature of AUSA _____

District Court Case Number:
(To be entered by Clerk) 1:15 CR098

CRIMINAL CASE COVER SHEET

U.S. DISTRICT COURT

Complete entire form

Place of Offense:

City Starkville

County Oktibbeha

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AUG 26 2015
U.S. DISTRICT COURT

Related Case Information

Superseding Indictment _____ Case Number _____

Same Defendant _____ New Defendant _____

Magistrate Judge Case Number 3:15-MJ-32-SAA

Search Warrant Case Number _____

R20/R40 from District of _____

Related Criminal Case Number _____

Defendant Information

Juvenile: Yes No If yes, Matter to be sealed: Yes No

Defendant Name Jaelyn Delshaun Young

Alias Name _____

Address Starkville, MS 39759

DOB 1995 SS# xxx-xx-8259 Sex F Race Black Nationality _____

Represented by: Kenneth Coghlan, Esq.

U.S. Attorney Information: AUSA Clay Joyner/Bob Norman Bar # 10316/3880

Interpreter: Yes No List Language and/or dialect: _____

Location Status:

Arrest Date 8/8/2015

Already in Federal Custody as of 8/8/2015 (Date) in LCDC, Oxford, MS (Location)

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Set 1 18:2339B.F Harboring or Concealing Terrorists 1-3

Set 2 _____

Set 3 _____

Set 4 _____

Date: _____ Signature of AUSA _____

District Court Case Number:

(To be entered by Clerk)

1:15 CR098