

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Crim. No. 04-29 (JRT/FLN)

ORIGINAL

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.)
)
MOHAMMED ABDULLAH WARSAME)
a/k/a Abu Maryam, Abu Zaynab)
)
Defendant.)

AFFIDAVIT IN SUPPORT
OF PRETRIAL DETENTION

AFFIDAVIT OF KIANN VANDENOVER

Your affiant, Kiann Vandenoever, being duly sworn, hereby deposes and say that:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since May 2002. Currently, I am assigned to the investigation of international and domestic terrorism organizations with the Minneapolis Division of the FBI.

2. This affidavit is being filed in support of the United States' Motion for Detention, pursuant to 18 U.S.C. § 3142. This affidavit is not intended to include each and every fact and matter known by me or known to the United States but is intended to present those facts relevant to the defendant's release or detention pending trial. The information provided is based on my personal knowledge and information conveyed to me by other law enforcement officials and other Special Agents of the FBI during the investigation of this case.

3. At the time of the commencement of proceedings in this case, the defendant, Mohammed Abdullah Warsame, a/k/a Abu Maryam, Abu Zaynab, was an alien resident of Minneapolis, Minnesota. Warsame was born in Mogadishu, Somali, on August 12, 1973. The defendant claimed to have left Somalia in 1989 and sought refugee status in Canada. The

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RICHARD D. SLETTEN, CLERK
JUDGMENT ENT'D
DEPUTY CLERK *[Signature]*

defendant resided in Toronto, Canada and became a naturalized citizen of Canada after 4-5 years. The defendant moved to Minneapolis from Canada in 2002 and is now a lawful permanent resident of the United States. Currently, the defendant is not employed but was a student at the Minneapolis Community and Technical College. The defendant lived in a rental apartment in Minneapolis.

4. On or about December 8-9, 2003, the defendant was interviewed by Special Agents of the FBI concerning his travel to Pakistan and Afghanistan in 2000 and 2001. The defendant agreed to voluntarily meet with and answer questions of the agents. Contained herein are admissions of the defendant concerning his activities in Afghanistan and elsewhere.

5. In 1995, while he was still residing in Toronto, the defendant was married to Fartun Farah, who he resided and continued to reside in Minneapolis. After the marriage, the defendant continued to reside in Toronto, Canada. Fartun Farah later became a naturalized U.S. citizen. In 1998, Fartun Farah, with the defendant, gave birth to a daughter named Maryam. After the birth of the daughter, the defendant continued to reside in Canada. After his marriage, the defendant continued to live in Canada (except for travel to Afghanistan), while his wife remained in Minneapolis, from 1995 until he obtained status as a legal permanent resident of the United States in April 2002.

6. By the defendant's admission, in or about early 2000, he became interested in the "utopian" Muslim society that had been created in Afghanistan. Thereafter, in approximately March 2000, the defendant quit his job and left his residence in Canada and his family, still in Minneapolis, and traveled to Pakistan with the intention of entering and residing in Afghanistan. According to the defendant, he traveled from Karachi, Pakistan and then the area of Islamabad,

Pakistan and thereafter illegally crossed the border between Pakistan and Afghanistan in the company of other young Muslim men on their way to jihad training camps inside Afghanistan. Warsame maintained to the interviewing agents that he had not intended to travel to Afghanistan to attend a training camp but admitted that, soon after arriving in Kabul, Afghanistan, he in fact did attend an al Qaeda training camp ("Camp 1").

7. The defendant said that he fully participated in the training at Camp 1 for several months. He engaged in a variety of military training – physical, weapons, tactics, martial arts. During his time in Afghanistan, the defendant experienced combat by joining the Taliban front lines on two separate occasions. The defendant initially claimed that he did not remember but eventually admitted that, on at least one occasion, he carried a weapon. The defendant stated that the training at the camp was physically and mentally demanding.

8. After the completion of his training at "Camp 1," the defendant traveled with other attendees at Camp 1 to a second al Qaeda training camp nearer Kandahar, Afghanistan ("Camp 2"). The military training at Camp 2 also involved field skills, the use of weapons, and martial arts. The defendant stated that Camp 2 further offered specialized courses in explosives and poisons although he stated he did not receive such training. The defendant stated that the training at Camp 2 was even more demanding than it had been at Camp 1. When asked to identify the Emir or leader of this second camp, the defendant described it as the "Camp of the Sheihk" and the "Camp of Usama Bin Laden." When asked how he knew that Bin Laden was the Emir of the camp, the defendant stated that he saw him on several occasions, that he attended lectures given by Bin Laden and that Warsame sat next to Bin Laden (on the floor) at a meal. The defendant stated that Bin Laden was very inspirational. The defendant admitted that he

knew that Bin Laden was a fugitive sought by several governments in connection with alleged terrorist attacks.

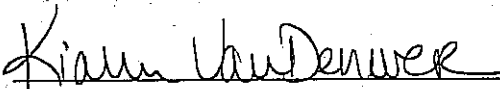
9. The defendant stated that after approximately two months attendance at Camp 2, the defendant traveled to a al Qaeda guesthouse affiliated with the camp and located near Kandahar. While at the guesthouse, the defendant served as a guard and taught English to al Qaeda members at an affiliated clinic. (The defendant admitted that he had provided similar language instruction at the training camp he attended.)

10. The defendant stated that in or about early 2001, he decided that he would not return to North America but instead stay and live in Afghanistan and have his wife and child join him there. The defendant stated that he needed financial assistance to bring his family to bring his family to Afghanistan and he approached a senior al Qaeda official in Kandahar to ask for help. The defendant admitted that the al Qaeda official responded that, instead of bringing his family to Afghanistan, al Qaeda would pay for the defendant to go back home. The defendant admitted that al Qaeda funds were then used to pay for his airline ticket travel back from Afghanistan and to provide him \$1700 traveling money. The defendant returned to Toronto in April 2001.

11. The defendant initially denied that he was asked to maintain contact with al Qaeda associates and denied that he had maintained any contact with such persons. However, the defendant eventually admitted that he had maintained covert communications with persons he had met in the training camps and admitted that he had provided financial assistance to those same persons by wiring funds to a bank account in Pakistan.

12. After returning from Afghanistan, the defendant submitted an application for an immigrant visa at the United States Consulate located in Montreal, Canada. In his application, the defendant specifically denied being a member or representative of a designated terrorist organization. Al Qaeda was designated a foreign terrorist organization in January 1999 as a result, in part, of the US Embassy bombings in Nairobi, Kenya and Dar es Salaam, Tanzania. Al Qaeda was re-designated as a foreign terrorist organization in 2001 based in part on the October 2000 attack on the USS Cole while anchored at Aden harbor in Yemen. According to the chronology of events provided by the defendant, the al Qaeda attack on the USS Cole in October 2000 took place while the defendant was attending the camp of Usama Bin Laden.

Further your affiant sayeth not.


KIANN VANDENOEVER
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before
me, this 6th day of February, 2004.

