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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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1/3/18 *all*

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2016 Grand Jury

17CR0622W

UNITED STATES OF AMERICA,

Case No. _____

Plaintiff,

I N D I C T M E N T

v.

Title 18, U.S.C., Sec. 2339A(a) -
Conspiracy to Provide Material
Support to Terrorists; Title 18,
U.S.C., Sec. 2339A(a) - Providing
Material Support to Terrorists;
Title 18, U.S.C., Sec. 2 - Aiding
and Abetting

ABDULLAHI AHMED ABDULLAHI,
aka "Phish,"
aka "Fish,"

Defendant.

The grand jury charges:

INTRODUCTORY ALLEGATIONS

At all times material to this Indictment:

1. Defendant ABDULLAHI AHMED ABDULLAHI, aka "Phish," aka "Fish" (hereinafter "ABDULLAHI"), was a Somali national who immigrated to the United States, and resided in the Minneapolis and San Diego areas before moving to Canada and becoming a naturalized Canadian citizen.

2. Al-Qa'ida in Iraq (hereinafter "AQI"), known also as Jam 'at al Tawid wa' al-Jahid, was a designated foreign terrorist organization (hereinafter "FTO") as defined by the laws of the United States. At

SPH:nlv(1):San Diego

3/9/17

cc: PRETRIAL

1 YAH

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1 various times, the FTO designation of AQI was amended to include the
2 following aliases: The Islamic State of Iraq and the Levant ("ISIL")
3 as its primary name, the Islamic State of Iraq and al-Sham ("ISIS" -
4 which is how the FTO will be referenced herein), The Islamic State of
5 Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh,
6 Dawla al Islamiya, and Al-Furquan Establishment for Media Production,
7 the Islamic State, ISIL, and ISIS. To date, ISIS remains a designated
8 FTO.

9 3. Coconspirator #1, aka "Tooth," aka "Toothman," aka "Duale,"
10 was a national of the United States and friend of defendant ABDULLAHI,
11 who resided in San Diego, California, within the Southern District of
12 California, before traveling from the United States to Syria, via Turkey,
13 on or about March 9, 2014 and engaging in terrorist activity, including
14 fighting in Syria. On or about August 26, 2014, Coconspirator #1 was
15 killed in Syria while fighting in Syria (i.e., engaging in violent
16 jihad).

17 4. Coconspirator #2, aka "Little Man," aka "Lil Man," aka "Lil
18 Homie," aka "Lil N****," aka "Hman," was a national of the United States
19 and cousin of defendant ABDULLAHI, who resided in the San Diego and
20 Minneapolis areas, before traveling from the United States to Syria, via
21 Turkey, on or about March 9, 2014 and engaging in terrorist activity,
22 including fighting in Syria.

23 5. Coconspirator #3, aka "Farmer," aka "Farmer G.," aka "F.G.,"
24 aka "Abu Raasas," aka "Raasas," was a Somali national and cousin of
25 defendant ABDULLAHI who immigrated to the United States and resided in
26 the Minneapolis and San Diego areas before moving to Canada and
27 ultimately traveling from Canada to Syria, via Turkey, on or about
28

1 November 10, 2013 and engaging in terrorist activity, including fighting
2 in Syria.

3 6. Coconspirator #4, aka "Zubayr," aka "Abu Zubayr," aka
4 "Zubair," aka "Zooman," aka "Z-man," was a Somali national and cousin
5 of defendant ABDULLAHI who immigrated to the United States and resided
6 in the Minneapolis and San Diego areas before moving to Canada and
7 ultimately traveling from Canada to Syria, via Turkey, on or about
8 November 11, 2013 and engaging in terrorist activity, including fighting
9 in Syria.

10 7. Coconspirator #5, aka "Sleepy," was a Somali national and
11 cousin of defendant ABDULLAHI and Canadian national who resided in Canada
12 before traveling from Canada to Syria, via Turkey, on November 11, 2013
13 and engaging in terrorist activity, including fighting in Syria.

14 8. In or about mid-November 2014, coconspirators #2, #3, #4, and
15 #5, were all killed in Syria.

16 Count 1

17 (Conspiracy to Provide Material Support to Terrorists)

18 9. Beginning in or about August 2013 through in or about November
19 2014, defendant ABDULLAHI AHMED ABDULLAHI, aka "Phish"; coconspirator
20 #1, aka "Tooth," aka "Toothman," aka "Duale" (hereinafter "Tooth");
21 coconspirator #2, aka "Little Man," aka "Lil Man," aka "Lil Homie," aka
22 "Lil N****," aka "Hman" (hereinafter "Little Man"); coconspirator #3,
23 aka "Farmer," aka "Farmer G.," aka "F.G.," aka "Abu Raasas," aka "Raasas"
24 (hereinafter "Farmer"); coconspirator #4, aka "Zubayr," aka "Abu
25 Zubayr," aka "Zubair," aka "Zooman," aka "Z-man" (hereinafter "Zubayr");
26 and coconspirator #5, aka "Sleepy" (hereinafter "Sleepy"), did knowingly
27 and intentionally conspire and agree with each other and others, known
28 and unknown to the Grand Jury, to provide material support and resources

1 as defined in Title 18, United States Code, Section 2339A(b), namely:
2 currency and monetary instruments (collectively "money"), and personnel,
3 to include, defendant ABDULLAHI, Tooth, Little Man, Farmer, Zubayr,
4 Sleepy and others, knowing and intending that such money and personnel
5 were to be used in preparation for, and in carrying out, a violation of
6 Title 18, United States Code, Section 956(a), that is, a conspiracy to
7 murder, kidnap and maim persons in a foreign country.

8 Manner and Means of the Conspiracy

9 10. The manner and means by which defendant ABDULLAHI, the
10 coconspirators Tooth, Little Man, Farmer, Zubayr and Sleepy, and others
11 known and unknown to the Grand Jury sought to accomplish the objects of
12 the conspiracy included, among others, the following:

13 a. Defendant ABDULLAHI, coconspirators Tooth, Little Man,
14 Farmer, Zubayr and Sleepy, and other persons residing in North America
15 agreed to travel to Syria to support and join terrorist fighters engaged
16 in terrorist activity in Syria, including the killing, kidnapping and
17 maiming of persons.

18 b. In preparation for their travel to Syria to act as foreign
19 terrorist fighters, some of the members of the conspiracy, including
20 coconspirator Tooth, practiced with firearms at gun ranges in San Diego
21 and other locations in North America.

22 c. Members of the conspiracy, including defendant ABDULLAHI
23 and coconspirator Zubayr, agreed and encouraged others to commit crimes
24 against the "kuffar" (an Arabic term meaning infidels or non-believers),
25 such as theft and fraud to obtain money and items to finance and support
26 their conspirators' travel to Syria to support and join terrorist
27 fighters engaged in terrorist activity in Syria, including the killing,
28 kidnapping and maiming of persons.

1 d. Defendant ABDULLAHI and two other individuals committed
2 an armed robbery of a jewelry store. ABDULLAHI committed the armed
3 robbery in order to finance and support his conspirators' travel to
4 Syria to support and join terrorist fighters engaged in terrorist
5 activity in Syria, including the killing, kidnapping and maiming of
6 persons.

7 e. Members of the conspiracy, including defendant ABDULLAHI
8 and coconspirator Farmer, agreed to send, did send, and caused others
9 to send money, via Western Union, to other members of the conspiracy,
10 including coconspirators Tooth and Little Man, to facilitate and finance
11 the travel of foreign fighters from North America to support and join
12 terrorist fighters engaged in terrorist activity in Syria, including the
13 killing, kidnapping and maiming of persons.

14 f. Beginning in or about November 2013 through in or about
15 November 2014, coconspirators Farmer, Zubayr, Sleepy, Tooth, Little Man
16 and other members of the conspiracy traveled from North America to Syria,
17 via Turkey, and acted as foreign terrorist fighters in Syria by engaging
18 in terrorist activity in Syria, including the killing, kidnapping, and
19 maiming of persons.

20 g. Members of the conspiracy, including defendant ABDULLAHI,
21 and coconspirators Tooth and Farmer, agreed to send, did send, and caused
22 others to send money, via Western Union, to third-party intermediaries
23 in Gaziantep, Turkey (located approximately 40 miles from the Syrian
24 border), for the purpose of supporting the members of the conspiracy
25 fighting and engaging in terrorist activity in Syria, including the
26 killing, kidnapping, and maiming of persons.

27 h. In order to avoid detection by law enforcement and
28 further the goals of the conspiracy, members of the conspiracy, including

1 defendant ABDULLAHI and coconspirators Farmer, Zubayr, Tooth and Little
2 Man, created and used email accounts to communicate via email messages,
3 and further used the Internet, including Voice over Internet Protocol
4 and cross-platform messaging applications, to send and receive private
5 text, audio and video messages for the purpose of: (i) planning,
6 coordinating and providing for the foreign fighters' travel, financial
7 and logistical needs; (ii) updating their coconspirators as to the
8 activities of terrorists in Syria, including ISIS foreign fighters, and
9 the specific battles and violent terrorist activity of coconspirators
10 fighting in Syria; and (iii) encouraging others to join and support the
11 violent activities of terrorists fighting in Syria.

12 i. In order to avoid detection and further the goals of the
13 conspiracy, members of the conspiracy used coded language to:

14 (i) refer to persons and groups of individuals, including
15 the terms:

- 16 • "brothers," "homies," and "homies in N.A. (i.e.
17 North America)," "akhs," or "akhis," to refer to
18 members of the conspiracy,
- 19 • "Phish" to refer to defendant ABDULLAHI,
- 20 • "Farmer," "Farmer G.," "F.G.," "Abu Raasas," or
21 "Raasas" to refer to coconspirator Farmer,
- 22 • "Zubayr," "Abu Zubayr," "Zubair," "Zooman," or "Z-
23 man" to refer to coconspirator Zubayr,
- 24 • "Tooth," "Toothman" or "Duale" to refer to
25 coconspirator Tooth,
- 26 • "Little Man" "Lil Man," "Lil Homie," "Lil N****,"
27 or "Hman," to refer to coconspirator Little Man,
- 28 • "Sleepy" to refer to coconspirator Sleepy;

1 (ii) refer to the weapons, training, fighting and the
2 violent activities of terrorist fighters, using
3 sports terminology and other slang such as:

- 4 • a good "three point shot" to describe expert
5 firearms marksmanship and "skills on da court" to
6 describe their battle/firearms skills;
- 7 • "b's" to describe number of persons they had
8 killed while fighting;
- 9 • "spring playoffs," "hooping season," "da game,"
10 "playing basketball," "blitz" and "smashing the
11 manz in ball" to describe their battles while
12 fighting;
- 13 • "sub us out" or "benched" to describe being killed
14 in battle;
- 15 • "caravan" to describe those individuals from North
16 America traveling to Syria to join terrorist
17 fighters and engage in terrorist activity,
18 including killing, kidnapping and maiming persons;
- 19 • "strap" to describe firearms;
- 20 • "gwap" to describe money;

21 (iii) discuss and plan the means by which they could
22 provide support to persons who were affiliated
23 with and supporting terrorist fighters, including
24 ISIS fighters.

25 Overt Acts

26 11. In furtherance of the conspiracy and to effect the objects
27 thereof, the following overt acts, among others, were committed within
28 the Southern District of California, and elsewhere:

- 1
- 2 a. From on or about October 24, 2013 through on or about
- 3 November 8, 2013, coconspirators Farmer, Zubayr and
- 4 Sleepy purchased airline tickets to fly from Edmonton,
- 5 Canada to Istanbul, Turkey, via Toronto.
- 6 b. On November 6, 2013, coconspirator Farmer wired, via
- 7 Western Union, approximately \$1,200 U.S. Dollars ("USD")
- 8 from Calgary, Canada, to Tooth in San Diego, California
- 9 for the purpose of financing Tooth's travel to Syria to
- 10 support and join terrorist fighters engaged in terrorist
- 11 activity in Syria, including the killing, kidnapping and
- 12 maiming of persons.
- 13 c. On or about November 10, 2013, coconspirator Tooth used
- 14 the credit card of an individual (hereinafter "individual
- 15 #1") to purchase airline tickets from San Diego to
- 16 Istanbul, departing November 12, 2013, for the purpose
- 17 of traveling to Syria to support and join terrorist
- 18 fighters engaged in terrorist activity in Syria,
- 19 including the killing, kidnapping and maiming of persons.
- 20 d. On or about November 10, 2013, coconspirator Farmer
- 21 traveled from Edmonton to Istanbul in order to support
- 22 and join terrorist fighters engaged in terrorist activity
- 23 in Syria, including the killing, kidnapping and maiming
- 24 of persons.
- 25 e. On or about November 11, 2013, coconspirators Zubayr and
- 26 Sleepy traveled together from Edmonton to Istanbul to
- 27 support and join terrorist fighters engaged in terrorist
- 28

1 activity in Syria, including the killing, kidnapping and
2 maiming of persons.

3 f. On or about November 12, 2013, coconspirator Tooth
4 traveled to the San Diego International Airport for the
5 purpose of flying from San Diego to Istanbul; however,
6 he did not travel because his reservation was cancelled.

7 g. Following coconspirator Farmer's departure from Canada,
8 from on or about November 12, 2013, through on or about
9 November 25, 2013, in Alberta, Canada, defendant
10 ABDULLAHI made cash withdrawals totaling approximately
11 \$2,800 Canadian Dollars ("CAD") from Farmer's bank
12 account using Farmer's debit card for the purpose of
13 sending the money to Farmer and other coconspirators'
14 efforts to support and join terrorist fighters engaged
15 in terrorist activity in Syria, including the killing,
16 kidnapping and maiming of persons.

17 h. In or about late November 2013, coconspirator Farmer
18 created an email account (hereinafter "email account #1")
19 for use by the coconspirators in North America, Turkey
20 and Syria for the purpose of communicating with each
21 other and avoiding detection of their activities by law
22 enforcement.

23 i. In or after November 2013, defendant ABDULLAHI, using the
24 moniker "Phish," authored an email message in email
25 account #1 to his coconspirators fighting in Syria (i.e.,
26 the "homies" and "brothers"), in which he stated that he
27 had heard that Farmer and the other foreign fighters had
28 been successful in killing their enemies in battle (i.e.,

1 "I heard yall got b's [i.e., bodies] under yall belt")
2 and that coconspirator Zubayr was a very good marksman
3 with a firearm (i.e., "I heard zubair [Zubayr's] three
4 point shot is no joke. I always knew that man was a hard
5 brother.").

6 j. In or after November 2013, coconspirator Farmer authored
7 an email message in email account #1 to defendant
8 ABDULLAHI (i.e., "Phish"), in which he told ABDULLAHI
9 that it was important that he travel to Syria and join
10 in the fighting (i.e., "it[']s an important time to catch
11 the caravan") before Farmer and his coconspirators were
12 killed in battle (i.e., "the playoffs is getting more
13 intense and the manz over here tryed [sic] to sub us out
14 the other week").

15 k. In or after November 2013, coconspirator Farmer authored
16 an email message in email account #1 to his
17 coconspirators in North America (i.e., "ahks" [slang term
18 for brothers]), in which he stated that he could not
19 provide a lot of details about their violent battles in
20 Syria (i.e., "hooping season") but urged them to travel
21 to Syria and join them on the battlefield soon (i.e.,
22 "come quick to these tryouts[.] it[']s no longer
23 voluntearie! [sic] It[']s a must to seat [sic] here on
24 da bench or get in the starting lines like the homeis
25 [sic] here"); and also stated that their enemies were
26 constantly on the offensive and supported by western
27 governments ("these cowards ... ain't playing fair or
28

1 truthful . . . and they all start the game without us
2 knowing and blitz us cuz the refs r from y'all side").

3 l. Sometime after November 2013, coconspirator Zubayr
4 authored an email message in email account #1 to his
5 coconspirators (i.e., "to all the homies") in which he
6 requested that they send money ("gwap") to coconspirator
7 Little Man for his airline tickets to travel to support
8 and join terrorist fighters engaged in terrorist activity
9 in Syria, and also encouraged them to steal and commit
10 fraud against the "kuffar" to raise such money because
11 according to Islamic law it was permissible to engage in
12 such crimes (i.e., it was "halal").

13 m. On or about January 9, 2014, in Edmonton, Alberta,
14 Canada, defendant ABDULLAHI committed an armed robbery
15 of a jewelry store for the purpose of financing the travel
16 and efforts of coconspirators in supporting and joining
17 terrorist fighters engaged in terrorist activity in
18 Syria, including the killing, kidnapping and maiming of
19 persons.

20 n. In or after February 2014, defendant ABDULLAHI, using the
21 moniker "Phish," authored an email message in email
22 account #1 to coconspirator Farmer in which he explained
23 that the delays in sending money to his coconspirators
24 were due to the difficulties in pawning the jewelry he
25 stole in the January 2014 armed robbery of the Edmonton
26 jewelry store.

27 o. On or about February 13, 2014, in San Diego, California,
28 coconspirator Tooth practiced with firearms at a gun

1 range, including an AR-15 style semi-automatic weapon,
2 in preparation for his travel to Syria to support and
3 join terrorist fighters engaged in terrorist activity in
4 Syria, including the killing, kidnapping and maiming of
5 persons.

6 p. On or about February 22, 2014, defendant ABDULLAHI wired,
7 via Western Union, approximately \$450.00 USD from
8 Edmonton to coconspirator Tooth in San Diego, California,
9 for the purpose of financing the travel and efforts of
10 his coconspirators in supporting and joining terrorist
11 fighters engaged in terrorist activity in Syria,
12 including the killing, kidnapping and maiming of persons.

13 q. On or about February 23, 2014, after receiving the wire
14 transfer of the \$450.00 USD from defendant ABDULLAHI and
15 at the direction of coconspirator Farmer in Syria,
16 coconspirator Tooth wired, via Western Union,
17 approximately \$350.00 USD from San Diego to a third party
18 intermediary (hereinafter "individual #2") in Gaziantep,
19 Turkey, for the purpose of financing coconspirators
20 engaged in terrorist activity in Syria, including the
21 killing, kidnapping and maiming of persons.

22 r. On or about February 28, 2014, defendant ABDULLAHI wired,
23 via Western Union, approximately \$900 USD from Edmonton
24 to coconspirator Tooth in San Diego for the purpose of
25 financing the travel of coconspirators Tooth and Little
26 Man to Syria to support and join terrorist fighters
27 engaged in terrorist activity in Syria, including the
28 killing, kidnapping and maiming of persons.

1 s. On or about March 3, 2014, defendant ABDULLAHI wired, via
2 Western Union, approximately \$1,700 USD from Edmonton to
3 individual #1 in San Diego for the purpose of financing
4 the travel of coconspirator Tooth and Little Man to Syria
5 to support and join terrorist fighters engaged in
6 terrorist activity in Syria, including the killing,
7 kidnapping and maiming of persons.

8 t. In or before early March 2014, defendant ABDULLAHI, using
9 the moniker "Phish," authored an email message in email
10 account #1 to coconspirator Little Man (i.e., "Hman"),
11 in which he instructed Little Man to contact Tooth about
12 getting the airline tickets for his travel (i.e., "but
13 talk to tooth and get y'all tickets") and stated that he
14 planned to join them in the battlefield in Syria (i.e.,
15 "inshallah we[']ll be all together on the front lines
16 just like I been dreaming about lately.").

17 u. In or about early March 2014, defendant ABDULLAHI, using
18 the moniker "Phish," authored an email message in email
19 account #1, to coconspirator Tooth in which he requested
20 that Tooth provide him with coconspirator Little Man's
21 full name and spelling because he was about to "send
22 [Little Man] some traveling money."

23 v. In or about early March 2014, defendant ABDULLAHI, using
24 the moniker "Phish," authored email messages to
25 coconspirator Farmer and his other coconspirators (i.e.,
26 "farmer and the homies") in which he stated that he wired
27 \$3,000.00 to coconspirator Tooth which monies were used
28 to purchase airline tickets to Turkey for Tooth and

1 Little Man, i.e., "I sent tooth 3 grand to get the
2 tickets" and "I hope y'all understand tooth go loot for
3 the tickets for the little man too and I'm working on
4 sending him pocket money before he leaves."

5 w. On or about March 7, 2014, defendant ABDULLAHI caused a
6 third party (hereinafter "individual #3") to wire
7 approximately \$150.00 USD from Edmonton to another third
8 party (hereinafter "individual #4) in Minneapolis, for
9 the purpose of providing travel money to coconspirator
10 Little Man so that Little Man could join and support
11 terrorist fighters engaged in terrorist activity in
12 Syria.

13 x. On or about March 7, 2014, after defendant ABDULLAHI sent
14 wire transfers totaling \$2,600 USD (referred to in Overt
15 Acts ¶¶ r. and s., above), coconspirator Tooth provided
16 the \$2,600 to an individual (hereinafter "individual
17 #5"), who subsequently deposited the money into the bank
18 account of another individual (hereinafter "individual
19 #6") to facilitate the purchase of airline tickets by
20 Tooth for traveling to Syria to join and support
21 terrorist fighters engaged in terrorist activity in
22 Syria, including the killing, kidnapping and maiming of
23 persons.

24 y. On March 8, 2014, within the Southern District of
25 California, after individual #5 deposited the \$2,600 into
26 the bank account, coconspirator Tooth purchased airline
27 tickets for Little Man and himself to fly from the United
28 States to Turkey for the purpose of joining terrorist

1 fighters engaged in terrorist activity in Syria,
2 including the killing, kidnapping and maiming of persons,
3 by using individual #6's credit/debit card.

4 z. On or about March 9, 2014, coconspirator Tooth traveled
5 from San Diego to Istanbul in order to join and support
6 terrorist fighters engaged in terrorist activity in
7 Syria, including the killing, kidnapping and maiming of
8 persons.

9 aa. On or about March 9, 2014, coconspirator Little Man
10 traveled from Minneapolis to Istanbul in order to join
11 and support terrorist fighters engaged in terrorist
12 activity in Syria, including the killing, kidnapping and
13 maiming of persons.

14 bb. On or about March 9, 2014, defendant ABDULLAHI created a
15 second email account ("email account #2") for
16 coconspirators Farmer and Zubayr to communicate
17 privately, via email messaging, with their family and
18 associates in North America and avoid law enforcement
19 detection of their activities in Syria.

20 cc. Shortly after coconspirators Tooth and Little Man
21 departed the United States for Turkey on March 9, 2014,
22 defendant ABDULLAHI authored an email message in email
23 account #1 to Little Man and Tooth (i.e., "tooth and lil
24 man"), in which he warned them to be careful because
25 Little Man's family had become aware of their plans to
26 travel to Syria to fight violent jihad and there were a
27 lot of people looking for them at the airport and in
28 Turkey.

1 dd. In response to defendant ABDULLAHI's email message,
2 coconspirators Tooth and Little Man authored a reply
3 email message in which they stated that everything was
4 okay and they were about to meet with Farmer and others
5 engaged in terrorist activity in Syria (i.e., "we about
6 to go and meet the homies[.] In sha allah [God willing]
7 we out of here.")

8 ee. In or about early March 2014, defendant ABDULLAHI, using
9 the moniker "Phish," authored an email message in email
10 account #1 to coconspirator Farmer in which he promised
11 to send "every dime that[']s in [his] pocket" to his
12 coconspirators in order for them to support and join
13 terrorist fighters engaged in terrorist activity in
14 Syria, including \$900.00 he obtained from a tax refund
15 (i.e., "I got like 900 [dollars]") and \$2,800 he withdrew
16 from Farmer's bank account (i.e., "your [Farmer's] mom
17 asked for those cards that day so I only got out like
18 2800 [dollars]").

19 ff. In or about March 2014, in response to defendant
20 ABDULLAHI's email messages regarding money,
21 coconspirator Farmer authored an email message in email
22 account #1 in which he told ABDULLAHI: not to stress
23 about the money; and send and have others send additional
24 money to individual #2 in Gaziantep, Turkey, known to
25 coconspirator Tooth, i.e., "send money to the same [name
26 of individual #2] I was telling u about. Tooth knows him
27 and all info[.] [T]hat's my connect here[.] it[']s all
28 good."

1 gg. On or about March 17, 2014, members of the conspiracy,
2 including defendant ABDULLAHI and coconspirator Farmer,
3 caused a third party (hereinafter individual #7 in Dubai,
4 U.A.E., to wire approximately \$458.00 USD, via Western
5 Union, to individual #2 in Gaziantep, Turkey, for the
6 purpose of supporting coconspirators engaged in terrorist
7 activity in Syria, including the killing, kidnapping and
8 maiming of persons.

9 hh. On or about April 9, 2014, at the direction of
10 coconspirator Tooth, individual #5 wired approximately
11 \$800.00 USD, via Western Union, from San Diego to a third
12 party intermediary in Gaziantep, Turkey (hereinafter
13 "individual #8"), for the purpose of supporting
14 coconspirators engaged in terrorist activity in Syria,
15 including the killing, kidnapping and maiming of persons

16 ii. On or about April 23, 2014, members of the conspiracy,
17 including defendant ABDULLAHI, caused individual #7 to
18 wire approximately \$1,000 USD, via Western Union, from
19 Dubai, United Arab Emirates to individual #8 in
20 Gaziantep, Turkey, for the purpose of transferring the
21 money coconspirators engaged in terrorist activity in
22 Syria, including the killing, kidnapping and maiming of
23 persons.

24 jj. After coconspirators Tooth and Little Man arrived in
25 Turkey in March 2014, coconspirator Farmer authored an
26 email message in email account #1 to his coconspirators
27 in North America (i.e., "all y'all bros"), in which he
28 stated that: they were winning the battles in Syria

1 (i.e., "I got some good news that we[']re smashing manz
2 in ball"); Zubayr was now the commander of their group
3 of fighters (i.e., "Zooman is ur coach now"); and Farmer
4 was arranging for Tooth and Little Man to join Farmer and
5 the other coconspirators fighting in Syria (i.e., "I got
6 ... [to] look for a ride to pick da homes for practice
7 [-] tooth and dem [them].").

8 kk. On or about August 14, 2014, coconspirator Tooth, located
9 in Syria, communicated with an individual (hereinafter
10 "individual #9) in San Diego, California, and discussed
11 individual #9 traveling to Syria to join Tooth, stating
12 that the leader of the ISIS caliphate (i.e., "the
13 khilaafah") "said we must bring our family under the
14 Islamic state" and described his battle for ISIS in Syria
15 which included a violent struggle involving killing of
16 persons in Syria, i.e., "I am in Jihad ... many brother
17 are getting shahada [martyred]... bombs are go off in the
18 everyday ... these n****s are trying to kill me."

19 All in violation of Title 18, United States Code, Section 2339A(a).

20 Count 2

21 (Providing Material Support to Terrorists)

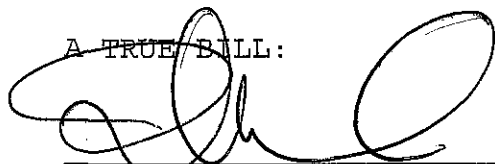
22 12. Paragraphs 1 through 8 and 11 of this Indictment are hereby
23 re-alleged and incorporated by reference.

24 13. From on or about February 22, 2014 to on or about March 9,
25 2014, within the Southern District of California and elsewhere,
26 defendant ABDULLAHI AHMED ABDULLAHI, aka "Phish," aka "Fish," did
27 knowingly and intentionally provide, and attempt to provide, material
28 support and resources, as defined in Title 18 United States Code,


1 Section 2339A(b), namely: currency and monetary instruments
2 (collectively "money"), and personnel, that is, coconspirator #1,
3 aka "Tooth," aka "Toothman," aka "Duale," and coconspirator #2,
4 aka "Little Man," aka "Lil Man," aka "Lil Homie," aka "Lil N****,"
5 aka "Hman," knowing and intending that such money and personnel were to
6 be used in preparation for, and in carrying out, a violation of Title 18,
7 United States Code, Section 956(a), that is, a conspiracy to murder,
8 kidnap, and maim persons in a foreign country; all in violation of
9 Title 18, United States Code, Sections 2339A(a) and 2.


10 DATED: March 9, 2017.

11 A TRUE BILL:

12 
13 _____
Foreperson

14 ALANA W. ROBINSON
Acting United States Attorney

15
16 By: 
17 _____
SHANE P. HARRIGAN
Assistant U.S. Attorney

18
19 By:  for
20 _____
CAROLINE P. HAN
Assistant U.S. Attorney