

1 States Supreme Court in *United States v. Booker*, 543 U.S. 220 (2005), *Rita v. United*
2 *States*, 551 U.S. 338 (2007), *Gall v. United States*, 552 U.S. 38 (2007), *Kimbrough*
3 *v. United States*, 552 U.S. 85 (2007), and *Nelson v. United States*, 555 U.S. 350
4 (2009), as well as 18 U.S.C. §3553(a), respectfully submits Defendant’s Sentencing
5 Memorandum. This pleading also responds and agrees with the conclusions of the
6 United States’ Sentencing Memorandum, filed on October 6, 2022 (Dkt. #56). As
7 such, undersigned counsel joins with the government in urging the Court to adopt
8 the joint recommendation of the parties and impose the recommended 240-month
9 sentence.
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12 I. **THE PSR**

13 Counsel have reviewed the Presentence Investigation Report filed on
14 February 28, 2022 (Dkt. #50) telephonically with the Defendant. Counsel and
15 Defendant have no objections to the PSR, with the exception of the Offense Level
16 Computation set forth in the PSR at pages 13-16. In that regard, counsel would ask
17 leave to adopt the position of the Government set forth in its Sentencing
18 Memorandum. That is, that the calculations of the parties in the Plea Agreement
19 should be followed by the Court. As importantly, should the Court conclude
20 differently—as the government also argues in its memorandum—the twenty-year
21 custodial sentence recommended by the parties is warranted in consideration of all
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1 the aggravating and mitigating § 3553(a) factors. See, Govt. Memo, Dkt. #56, pp.
2 15-17.

3 **II. COMMENTARY ON SENTENCING FACTORS**

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5 In the final analysis, it remains the Court’s task in this sentencing to fashion a
6 sentence under the § 3553(a) factors that is *sufficient, but not more than necessary*,
7 to accomplish the goals of sentencing. And, as the government has cogently argued
8 in its Sentencing Memorandum, “here a balanced consideration of all the
9 aggravating and mitigating factors of the 3553(a) factors supports the 240-month
10 sentence jointly requested by the parties.” Memo, Dkt. 56, p. 17. Accordingly,
11 counsel do not wish to belabor the Court with redundant argument and analysis.
12 There is no question that this is a very serious case, just as there is equally little
13 question that a twenty-year sentence is a serious sentence. The government’s
14 analysis of the § 3553(a) factors with respect to: (1) the nature and circumstances of
15 the offense; (2) the history and characteristics of the Defendant; (3) the seriousness
16 of the offense, the promotion of respect for the law, and provision of just
17 punishment; (4) adequate deterrence; and (5) unwarranted sentencing disparities
18 more than adequately support the joint recommendation of the parties.
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23 As such, counsel would only wish to add a few additional thoughts. First,
24 some additional background from Defendant’s upbringing and family relationships
25 will be useful for the Court’s consideration—all of which are consistent with the

1 background investigation of the PSR and supported more fully by the twelve rather
2 moving letters from family members filed on Mr. Abdullahi's behalf, attached hereto
3 as Group Exhibit A. These heartfelt letters truly speak for themselves and are well
4 worth the Court's consideration. In short, Mr. Abdullahi's very difficult upbringing
5 as a young refugee from war-torn Somalia, along with his close family relationships,
6 provides meaningful context for the Court's consideration under § 3553(a)(1). But
7 this background is meant for context only, and in no way is an attempt to excuse
8 Defendant's conduct for which he fully acknowledges and accepts complete
9 responsibility.
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12 Counsel respectfully submit that the Court should also not ignore the realities
13 of the continuing COVID-19 pandemic in the federal prison system, and its impact
14 on detained or incarcerated defendants such as Mr. Abdullahi. It is impossible to
15 predict precisely how long the extremely dangerous conditions in the federal prison
16 system will remain; especially after Delta and Omicron variants continue to surge at
17 previously unprecedented levels, despite the vaccine. Conditions behind prison walls
18 will, of course, be impacted by public health conditions on the outside, particularly
19 insofar as guards and staff circulate in and out of the prison; and as new inmates are
20 introduced into the prison population. Taking into consideration both past surges and
21 having knowledge of current trends, the most recent spikes in COVID-19 infections
22 across the country do not bode well for incarcerated individuals. Counsel recognize
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1 that the Court must certainly be fully aware of the arguments related to COVID-19
2 from having been apprised of many compassionate release motions brought before
3 it and throughout the country pursuant to 18 U.S.C. §3582(c)(1)(A).¹ This, too,
4 counsel submit is a factor the Court can and should take into account in accepting
5 the recommendation of the parties. Mr. Abdullahi has already done what many
6 might consider to be several years of “hard time.”
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8 Likewise, as the government also acknowledges, Mr. Abdullahi abandoned
9 his immature radical jihadist ideology when the severity and tragedy of his cousins’
10 deaths hit home with him. (Govt. Memo, Dkt. 56, p. 19) In plain point of fact, the
11 same 30-year-old man who committed these crimes is now 37 years-old and a far
12 different man. Again, this does not excuse his conduct but provides considerable
13 context for the Court to accept the recommendation of the parties that came after
14 very contracted negotiations between the parties. Needless to say, both sides
15 benefited from the results of those negotiations. But in the end, it simply cannot be
16 said that the recommended 240-month sentence is not fair under the totality of the
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21 ¹ See, e.g., *United States of America v. Garcia*, No. 18-146 (JDB), 2021 WL 4848700 (D.D.C.) (October 8, 2021)
22 citing Sentencing Tr. at 17-18, *United States v. Gonzalez*, Case No. 1:18-cr-00669-JPO, ECF No. 250 (S.D.N.Y.
23 April 2, 2021)([M]ost of the time has been in lockdown conditions 23 hours a day, basically like solitary
24 confinement with no access to visitors for most of that time, virtually limited programming. And I do believe that
25 because it's been harsher than a usual period that it's more punitive, that it's essentially the equivalent of either time
and a half or two times what would ordinarily be served. So, I think having served 24 months is equivalent to having
served three years. That's what I believe in terms of how punitive it's been and how harsh it's been.) See also *United
States v. Rodriguez*, 492 F.Supp.3d. 306, 311 (S.D.N.Y 2020)(Another district court judge, the well-respected Judge
Jed S. Rakoff of the Southern District of New York, reduced a sentence because he opined that the pandemic not
only threatened the individual defendant’s health, but also made the defendant’s “incarceration harsher and more
punitive than would otherwise have been the case”).

1 circumstances. It is most certainly a sentence that is sufficient, but not greater than
2 necessary, to affect the purposes of federal sentencing under all the § 3553(a) factors.

3 Respectfully Submitted,

4 Dated: October 7, 2022

5 /s/THOMAS ANTHONY DURKIN
6 **THOMAS ANTHONY DURKIN**

7 Attorney for Defendant
8 Abdullahi Ahmed ABDULLAHI

9 /s/MARC X. CARLOS
10 **MARC X. CARLOS**

11 Attorney for Defendant
12 Abdullahi Ahmed ABDULLAHI

Group Exhibit A

Exhibit A.1

Dear Judge Whelan,

My Name is Nimo Abdullahi. Abdullahi is my younger brother. I wanted to give you a glimpse of the type of person my brother really is. He is gentle, kind and loving. He has a good heart and anyone that knows him can tell you that. Abdullahi was there always there for me when I needed. We were really close growing up and we still are. We talk all of the time, at least twice a week. I send him pictures of his nieces and nephews often. Although he is my younger brother, he acted like an older brother, he always protected me and made sure I was always ok. He is considerate, compassionate and overall a good person. My brother is someone I could count on. He was always there to help our family in all aspects. He played a major role in raising my daughter, he was always there for her and guided her in the right direction. He used to take her on outings to spend time with her, he taught her the value of being a good person in this world. He is and has always been a positive force in my life. I can talk to him about anything. His arrest was devastating to me and my family. We were all sad and depressed and there was nothing we could do about it. I felt pain for my elderly parents who lost the person that supported them in every way and the kids who missed their uncle that was always there for them. Life is not the same without my brother, our family was constantly worried about him and his wellbeing, that feeling never goes away. I wish this was not our reality. I see first hand the pain and loneliness my family experiences daily, some days it is too much to bear. My family will never be the same. Judge Whelan, I humbly and respectfully ask you to consider Abdullahi's character, and know that to me he is my loving brother and a good person with values and morals who deserves a chance at leniency. Please know that he is loved and cared for by many. Thank you Judge Whelan for taking the time to read this and I hope you can look at his case with compassion. Nimo

Exhibit A.2

Dear Judge Whelan,

I am Layla Yared, Abdullahi's niece. To me he's always been known as Abti outside (abti means uncle), as a kid I remember growing up in a bustling environment, there was always a lot going on with people at work and having adult priorities. As a kid you know its hard to understand that people have responsibilities and can't play 24/7, however my uncle, Abdullahi, always made time. Even if it was just 10 mins to go on a walk and play outside. To younger me this meant the world to me, and it still does. Knowing that no matter what I always have someone who will make time for me and listen still means the world to me. Now I am close to turning 18 and am at a point where I have a lot of decisions hitting me at once and find myself often needing guidance, however with my uncle being away it can be hard on me, but even then, he still does his best to help. Recently I got accepted to the University of Minnesota, and I had a big decision to make about confirming enrollment and whether to dorm and my uncle Abdullahi was the one who gave me the advice I needed to do what I believed. He told me that no matter what I will be successful and to make sure I was prioritizing my future, he reminded me of my support system, one of the best pieces of advice was to not let my family influence my decision but to do what was best for me. Being a girl in an African household, our families tend to treat us with kid gloves out of protection, but my uncle is helping to push me My uncle truly means the world to me, he is the kindest person I know and has the biggest heart. Through all of this he has still found ways to guide me through the ups and downs of my teenage years. It can be so hard being a young girl growing up and sometimes it takes more than just talking with my mom. He has been an uncle, a friend, and even sometimes like a father. Seeing my uncle, who helped raise me and who was always one call away if I ever needed, in jail completely broke me. I remember being a kid in middle school when I found out and I didn't know who to go to about my feelings and my sadness because the one person who I would've went to was now gone. Even after my uncles' arrest, he continued to be the glue of sorts for my family, maybe even more so after. He has held our family together in so many ways and has been the most optimistic and always reminding us to stay positive. I admire his strength and I can only hope to emulate those same traits. My uncle is a good man, has always done right by our family, always done right by me. I can only hope that his character speaks for itself and that he can be given the opportunity to be the man he always has been, respectful and honest with dreams of a better life. Judge Whelan I hope you can see that Abdullahi is deserving of leniency and a chance to give back.

Exhibit A.3

Dear Judge Whelan,

My name is Hibaq Dualeh. I'm writing this letter on behalf of my cousin Abdullahi Abdullahi with the intent of speaking on his outstanding character. I hope after reading this letter you have a better understanding of Abdullahi's compassion and empathy, and view him through the eyes of his family, friends, and community. Abdullahi is like a brother to me; he is someone I grew up with and someone I adore and admire greatly. Abdullahi is one of the main reasons I became a human rights advocate. Growing up, he always reminded us of how fortunate our family was to live in the United States where we could pursue all sorts of opportunities that so many others could only dream of. He has a big heart that is overflowing with gratitude and appreciation. He never once took for granted our right to live in a world free of fear and persecution. And we never forgot this thanks to him.

Abdullahi was the only one in our family who encouraged me to pursue journalism when I couldn't decide what degree to study in college, while others encouraged me to choose the course that would make me the most money. He insisted that I could change the world through journalism. I didn't pursue journalism, but I did choose a path that allows me to dedicate my time and means to serving the very people Abdullahi encouraged us to seek out and help. To exemplify the ideals Abdullahi helped instill in us, I give the following quote by John Wesley: "Do all the good you can, in all the ways you can, in all the places you can, at all the times you can, to all the people you can, for as long as you can." His compassion, patience, and wisdom can serve as a role model that Society can benefit from.

Best,

Hibaq Dualeh

Exhibit A.4

Guled Kariye
Edmonton, Alberta
March 1, 2022

Regarding: Abdullahi. Abdullahi

Dear: Judge Whelan:

It is a genuine honour to write this letter regarding Abdullahi Abdullahi. My name is Guled Kariye. I have had the pleasure of knowing Abdullahi his entire life. Our mothers are sisters who are one year apart; therefore Our families were incredibly close growing up. Abdullahi is not only my cousin, but he's also one of my best friends.

Abdullahi has been there for me for every pivotal moment in my life. I can't remember when I needed him, and he wasn't there. He was the best man at my wedding and the first person I called when my child was born.

Abdullahi's incarceration has dramatically affected our entire family, but mostly his elderly Parents because he was their primary provider. We are all deeply saddened by this unfortunate circumstance. It is my sincere hope that Abdullahi gets a lenient sentence. Abdullahi is by far one of the most genuine people you will ever come across. He is the type of person who would not hesitate to give you the shirt off his back. We worked together as Disability Support Workers, and during that time, I witnessed just how compassionate and kind-hearted Abdullahi is. He went out of his way to show empathy and treated every client with the utmost respect and dignity. We also worked at the Farmers Market in San Diego selling East African Cuisine. At the end of each shift, Abdullahi would collect the leftover food and give it to the homeless people at Ocean Beach.

Abdullahi was a mentor to his younger siblings and cousins, often being the voice of reason within our family. I speak with Abdullahi quite frequently. Although he is incarcerated, he manages to always uplift my spirit by staying so positive. I can wholeheartedly say I have never seen Abdullahi have ill intentions to harm anyone. I hope this letter can give you a glimpse of the man Abdullah truly is. I sincerely hope you consider this letter when it's time for sentencing and find it in your heart to see Abdullahi for the man he truly is.

Thank you for your time.

Sincerely,

Guled Kariye

Exhibit A.5

Asha Kariye
Edmonton, AB
March 4, 2022

To the Honorable Judge Whelan,

Judge Whelan, I hope this letter finds you well. My name is Asha Kariye, and I am an Elementary School Teacher and currently pursuing a master's degree in Educational Psychology. I am the cousin of Abdullahi but to simply call him a cousin is an understatement. I've spent my entire childhood and majority of my adulthood with Abdullahi and consider him to be an older brother. With the death of my brother Hamze in 2014, Abdullahi immediately stepped in and filled the emotional void that my family and I had been experiencing. In this letter, I hope to shine a light on the character of the compassionate individual that I know Abdullahi to be.

I have many memories of Abdullahi that I could tell you about, but they all have the same underlying theme; he was present. During times of immense hardship Abdullahi was there. When I was in need of help Abdullahi was there. When I started my first day of college Abdullahi was there. There isn't a single time of difficulty or ease in my life that I don't recall Abdullahi to be missing, because that's simply who he is. A man of integrity who is willing to drop anything that he is doing to show up for his family and loved ones. I knew that the compassion that Abdullahi showed me wasn't just reserved for the people he knew when I learned that he would distribute the left-over food from our family's restaurant to the homeless community in San Diego. I've witnessed the intense level of selflessness he shows others when he would sacrifice his time and energy to help my mother in every way possible when she was grieving the death of her two sons, Hamze and Hirsi in 2014. He made it a priority to be as present and supportive as possible for my family and I. Abdullahi has also played a major role in caring for his elderly parents; specifically, his Father who suffers from a Chronic illness.

Even though Abdullahi has been incarcerated for several years now, the role he has played in our lives has not dwindled in the slightest. Abdullahi continuously checks-in on my family and I and

is the person I confide in when I need advice or just a listening ear. We lean on him even though we are supposed to be the ones to emotionally support him, but that's who Abdullahi is, he puts others before himself. I speak to Abdullahi often and it's clear to me that he has greatly reflected on his actions. I have no doubts that Abdullahi regrets the mistake that he made, a mistake that he will always live with, whether inside of a jail cell or not.

Abdullahi is a pillar of support. A shoulder to lean on. A source of love, light, and joy. He is missed tremendously by his family and community and there isn't a shred of doubt in my mind that he wouldn't not only continue but increase in being a present and impactful force in the life of others. With a reduced sentence, Abdullahi will have a chance to right his wrongs, serve his community, and guide others away from making the same mistakes he has made.

Judge Whelan, I thank you for your time.

Sincerely,

Asha Kariye

Exhibit A.6

Abdi Karie



Feb 28, 2022

To The Honorable Judge Whelan,

My name is Abdi Karie. I am a Corporate Controller currently living in Minneapolis, MN. I am the cousin of Abdullahi Abdullahi. I've known Abdullahi my entire life. From attending elementary school together to taking college classes together to working at our family's restaurant together, Abdullahi has always been a presence in my life. With this letter, I hope to shed some light on Abdullahi's character and what he means to me. But to do so, I need to share some background information.

In November 2013, two of my brothers, Hamze and Hirsi, made the unfortunate decision to travel to Syria and eventually joined a terrorist group known as ISIS. At the time I was in my first year of graduate school, living in Minnesota away from my family. When I first learned about my brother's departure, I was in disbelief. In 2013 very little was known about ISIS or the war in Syria. However, as the months went by and the situation in Syria developed, it became apparent that my brothers had made a decision that would negatively impact my entire family for years to come. A decision that still haunts us to this day.

Growing up, my mother was always protective of us. She was the type of mother who would come looking for you as soon as the sun went down. My brother's decision to go to Syria left my mother broken. She felt that she had failed in life, and like the rest of us, she felt helpless. When my brothers departed to Syria, my mother had a small business selling household goods such as carpets and sofa sets. My brother Hamze was the one she relied on the most to help run her small business from day-to-day activities such as making deliveries and managing inventory. With Hamze now gone, I knew I had to travel to Canada and help my mom not only with her business but help get through the most challenging time in her life.

As soon as Abdullahi found out about my plans to leave school and return to Canada, he called me repeatedly for days trying to convince me to stay and continue with my classes. Abdullahi reassured me that I wasn't making a selfish decision by continuing my courses. He reassured me that he would be there for my mom and help her continue the business. At first, I was hesitant because I desperately wanted to be there. But Abdullahi was persistent and eventually convinced me to stay. Abdullahi quickly put any worries I had at ease. Abdullahi spent hours day after day helping my mom. Everything from arranging furniture delivery to buying groceries. Abdullahi went above and beyond to fulfill his promise to me. Because of him, I was able to continue with my studies despite tremendous uncertainty and grief.

After my brother's departure, Abdullahi and I had many discussions about Hamze and Hirsi and their unfortunate decision. Abdullahi shared with me the emotional burden of living every day,

not knowing if your brothers were dead or alive. Abdullahi made it his responsibility to ensure that my remaining family members and I continued with our lives. Abdullahi became our emotional support, often calling twice a day, checking in on me, giving me words of encouragement, and hope that the unfortunate circumstances we were facing would somehow have a positive ending.

Recently Abdullahi's younger brother Hirsi unexpectedly passed away. It seemed like we were in a vicious cycle of loss and despair. Despite being incarcerated, Abdullahi did everything to ensure that his family was emotionally supported. When we were once again at our lowest, he uplifted us with words of encouragement; he reminded us of good memories and talked us through our grief of losing Hirsi. Abdullahi is a selfless person; serving and caring for others comes naturally, so being there for us despite facing his own challenges was easy for him.

Your Honor, I respectfully ask you to be lenient with Abdullahi's sentence. I hope you will see Abdullahi for who he truly is a kind, caring, and loving son, brother, and cousin who has spent his entire life caring and supporting his family. Abdullahi has the potential to do good in this world. During his time incarcerated, Abdullahi has done significant self-reflection, and through many conversations with him, I know that he has learned from his mistakes and shortcomings. If allowed to rejoin society, I am confident that he will do everything to positively impact and contribute to his family and those he encounters.

Thank you for your time and consideration

Sincerely,

A handwritten signature in black ink, appearing to read 'Abdi Karie', with a stylized flourish at the end.

Abdi Karie

Exhibit A.7

Fadumo Abdullahi

Maple Valley, Washington

Dear Judge Whelan,

My name is Fadumo Abdulahi, I'm the sister of Abdulahi. My brother Abdullahi has made a huge difference in our lives. Abdulahi has always been the one you can depend on. The most caring and selfless person in our family. The soft spoken and compassionate one. Growing up in an immigrant family, struggling to adapt, life was never easy but having close supportive siblings made experiences easy. Made our struggles bearable. Our family has fled a war torn country, came to the west seeking a better, safer life. Growing up, Abdulahi was not a difficult child, stayed out of trouble. Everyone loved him. He's the type of person you can call in times of need and he'll be there for you in a heartbeat. He grew up in a close nit family, close community. A community that loves him.

Abdullahi has had to deal with loss and pain most of his life. From fleeing a war torn country to losing many loved one along the way. He has gone through traumatic events that no child should go through. Our family has experienced war first hand. On many occasions during the war back home, we could hear bombs going off in the distance, and the sound of gunshots which frightened us. On many nights, we would have to hide under our beds and cover our ears so we wouldn't hear what has happening around us.

We've also lost my younger brother recently and having to tell to my brother who was incarcerated was one of the difficult things we've had to do. Yet Abdullahi has remained strong through all the hardships he's had to deal with.

Our parents did everything they could to make sure we stayed on right the path. Prior to his arrest, Abdullahi was working to help my parents. He worked in the oil fields to support my parents. Abdullahi was my parents primary caregiver. He was the sole provider for my parents. He put his life on hold to help our parents. He had plans of returning to school prior to his arrest and hopes to continue with that goal.

Despite all the hardships Abdullahi has had to deal with growing up, Abdullahi was committed to giving back to the community. He's been active in non profit organization focused on empowering young immigrant youths in Edmonton. He was in the process of helping my mother start up a non profit prior to to his arrest.

Abdullahi's arrest has been very difficult for our family, for my parents who depended on Abdullahi. My parents health has declined the last few years since Abdullahis arrest, and this case has taken a toll on all of us. I hope Abdullahi is given a second chance in life. Abdullahi has so much life to live. He has plans of giving back to the community, giving back to society. Continuing to help our aging parents and the rest of our family.

Judge, I ask you for leniency. Abdullahi is not a threat to society.

Thank you,

Fadumo Abdullahi

Exhibit A.8

My name is Ahmed Abdullahi Mohamud, and I am the father of Abdullahi Abdullahi. I have dedicated my entire life to my children in order to ensure that they become successful in every aspect of their life. I made sure to provide for my family in every way possible. A few years prior I was struck with health complications that made it extremely difficult for me to work and provide for my family. At this devastating time of my life, my son Abdullahi stepped up to the plate and took the responsibility to fully provide for myself, my wife and his siblings. Abdullahi devoted all of his time and energy to try and fill my role as breadwinner in our family. He helped tremendously with finances and also became my support system when I needed him to be. Often worried about the declining health of his mother and I, Abdullahi never once took a personal vacation or even to take time with his peers. Whether he was working overtime at work or running errands for the family, Abdullahi was committed to making sure his family was taken care of at all times. Abdullahi's ability in the midst of adversity to put his personal life on hold for the well-being of his family sheds light to how courageous and committed he is to his family.

I have always taught and instilled in my children to be respectful, responsible, and considerate individuals. Individuals that not only focus on their own goals, but ones who also offer a helping hand to those in need. Abdullahi was there to comfort his grieving Aunt and support her with anything and everything that she needed.

I hope Abdullahi is given a chance to live out his life and fulfill his dreams of giving back to the community, of starting his own family. I hope he is provided with a second chance in life.

Exhibit A.9

My name is Mulki Hassan and I am the aunt of Abdullahi. I've known Abdullahi since the day he born. I;ve always known him to be a young man who is generous, kind, and committed towards caring for his family. Abdullahi spent a large portion of his time helping my family and I after my sons passed. Abdullahi knew that I was grieving, so he would spend a lot of quality time with me, help me run errands, and was overall my support system. I was very grateful for Abdullahi. I was very pleased at that fact that Abdullahi did not go to Syria with his cousins and instead was by my side through the most traumatic part of my life. He has always been the backbone of his family whether it be financially or emotionally and was always there to pick up the pieces when needed. At a moment where I needed him the most, my nephew put his wishes of starting his own family on hold just so he could provide the support that I so desperately needed.

Exhibit A.10

My name is Ibado Hirsi Hassan, I am the mother of Abdullahi Abdullahi. I raised my children to be caring and compassionate towards everyone. I left my country to seek a better life for my kids. I did everything I can to provide and give them a good life. As I started to get older and needing more care myself, Abdullahi was the first to step up. I wasn't surprised by this in the slightest, Abdullahi was always a kind and thoughtful child. His compassion and his ability to empathize with others always stood out to me. Abdullahi spent majority of his time between school, working for the family, helping me around the house, and at the gym. Unlike other young men his age, Abdullahi was not one to be easily influenced by his peers. He saw where we came from and how we struggled as a family and it motivated him to do better, to be better. His focus was to escape the poverty that surrounded him and to take care of his family. He was always someone that everyone in our family depended on. As mother, my passion has always been to help those that are unable to help themselves. I've worked tirelessly with families, single mothers and young women facing physical and sexual abuse back home in the Somali State, Ethiopia. Abdullahi played a big role in helping me with this cause. He was always there when I needed. He has always been a caring and compassionate person.

Prior to Abdullahi arrest, we were in the process of starting a non profit organizations geared towards helping the youth, an organization formed to combat the growing threat from extremist ideologies, gangs, and drugs on Edmonton Somali youth. Fueled by personal tragedies, we wanted to use our experience and knowledge to educate Somali families about these growing threats that plague our community and to provide the tools and resources necessary to facilitate programs that encourage our youth to be successful and productive members of society. I hope one day Abdullahi is provided with the opportunity to continue with this plan.

Exhibit A.11

Hanan Mohallim



Mar 2, 2022

Re: Abdullahi Abdullahi

To The Honorable Judge Whelan,

My name is Hanan Mohallim, I am the cousin of Abdullahi Abdullahi, as well as the sister of Hanad Mohallim. My brother who passed away in Syria in 2015 is heavily involved in this case, and I think it is important that I share my perspective as it might give you insight into who Abdullahi is and his character.

Over the last few years, the close knit family that I grew up with has been shaken with tragedy, over and over again. First with the deaths of my brother and cousins, and then with the incarceration of Abdullahi, and several more premature deaths since then (Including Abdullahi's younger brother, Hirsi). The lengths in which our family has suffered since 2014 has been incomprehensible. Throughout these insurmountable losses, Abdullahi has served as an important part of my life, and the lives of many people in our family. Even through his imprisonment, he has served as an important pillar of strength and support in this family. In fact, I admire the level of self reflection and self growth he's accomplished over the past few years. He has always been a good person, but almost everyone can agree that the time he's had to reflect about his life and the decisions that have been made, he's emerged more wise, kind, and more knowledgeable regarding the emphasis of peace in our religion.

I grew up around Abdullahi for the majority of my life and all I've ever seen from him was kindness, patience, and a mild mannered nature. Years ago when we all still lived in the same community in San Diego, I recall him spending hours every week taking care of our elderly grandmother, who suffers from a disability caused by a stroke. He was a young man at that point, in his early twenties, and yet he didn't mind sacrificing his time to help someone in need. I grew up with a single mother and in many ways we leaned on the support from our extended family to survive and Abdullahi was someone who always stepped up and babysat us when my mother was in need of child care. I have countless stories like this, of Abdullahi helping various family members in need. These acts of kindness and services added up and he served as a pillar of support for our entire family. We have been devastated by his absence from our lives due to his incarceration.

The events of 2014 impacted our family greatly, and I am aware that the nature of the charges against Abdullahi are severe and I know that these are matters to be taken seriously but I'm pleading with you to also consider that Abdullahi is a man that is loved and cherished by those around him, and that he has suffered by losing so much of his loved ones and those losses have been cause for self-reflection and has caused him great regret. Lastly, I firmly believe that at the core of who he is, Abdullahi is a good person with a kind heart.

Sincerely,

A handwritten signature in black ink, appearing to read "Hanan Mohallim". The signature is written in a cursive, flowing style with some loops and flourishes.

Hanan Mohallim

Exhibit A.12

Hodan A Dualeh


Judge Thomas J. Whelan
United States District Court
Southern District of California
221 West Broadway
San Diego, CA 92101

Dear Judge Whelan:

Hodan Dualeh is my name, and I live in Bloomington, Minnesota. I am currently an MPH student in Epidemiology at the University of Minnesota, as well as a small business owner. I've spent most of my life as a human rights activist and community organizer.

I've known Abdullahi my entire life; he's my cousin, but because of our close relationship, I've always thought of him as my brother. Abdullahi is clever and funny, humble, a protector, and loyal brother. Our mothers raised us to be as close as brothers and sisters, and he never deviated from their teachings. The case against him bothered and surprised me because he has always been an honorable, solid, and God-fearing person. I am grateful for the opportunity to write this letter for Abdullahi; I understand the gravity of the situation, and I hope the court will be lenient.

His compassion for sentient beings and loyalty to his adopted country are two of his many qualities that come to mind as I write this letter. I remember walking home from school with him and the rest of our siblings and cousins one afternoon when it had been raining all day and the ground was crawling with frogs and earthworms. When I saw Abdullahi telling the kids to move I asked him why are you being so annoying? His response was that he is saving the earthworms and frogs from being stamped because it is our responsibility to care for all God's creatures who are unable to defend themselves. I was so moved by his thoughtful and kind act that I still look at the ground after it rains to make sure I don't step on them. Abdullahi respected all living creature no matter how unappealing they look; now you can imagine the level of empathy he has for his fellow human being.

Another instance of Abdullahi's compassion occurred when Abdullahi, my sister, and I were crossing the road and noticed broken glass from what appeared to be an accident. The light turned yellow in the middle of the cross-section, and Abdullahi noticed an elderly couple approaching us. I was worried about the light turning red, so I quickly crossed the street. I looked back and saw Abdullahi moving the larger shattered pieces out of the way of his feet. I yelled at him to hurry up, but he ignored me. I confronted him later, in an enraged tone, and asked him why he was so reckless. He informed me that there are children, elderly people, and pets crossing

the street, some of whom are wearing open-toed sandals, which could endanger them. I saw the shattered glass, but I ignored it and focused on my life; Abdullahi put others before himself. His compassion is unparalleled.

He had always wanted to be a farmer and a community advocate because he wanted to serve a cause bigger than himself. As a result, he volunteered as a program coordinator in a local Ogaden community chapter to assist drug/alcohol addicted community members and newly arrived immigrants in finding housing. He is the nicest and most hopeful person you will ever meet; his faith is strong, and he possesses the integrity and ability to positively affect those around him.

Sincerely,

Hodan Dualeh