

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

MAR 03 2015

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Ruth Rose, DEPUTY

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
-vs-)
)
ISRAA JAFAR ALI, and)
SAJJAD HUSSAIN AL FEHAIDAH,)
a/k/a CJ,)
)
Defendants.)

CR 15-043 F

No. _____

Violation: 18 U.S.C. § 371
18 U.S.C. § 2(a)
18 U.S.C. § 1038(a)(1)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Conspiracy to Commit a Terroristic Hoax)

From on or about September 19, 2014, and continuously thereafter, until on or about September 23, 2014, in the Western District of Oklahoma, and elsewhere, the defendants,

-----**ISRAA JAFAR ALI,**
SAJJAD HUSSAIN AL FEHAIDAH,
a/k/a CJ,-----

willfully and knowingly combined, conspired, confederated and agreed together and with each other, to interdependently commit an offense against the United States, that is to convey false or misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity will take

place that would constitute a violation of Chapter 113B of Title 18, being Title 18, United States Code, Section 2332f(a)(1)(A), to wit: that the detonation of an explosive device, via suicide bombing, at a place of public use, a Christian church, will take place near the campus of the University of Central Oklahoma (UCO), with the intent to cause death or serious bodily injury. In violation of Title 18, United States Code, Section 1038(a)(1)(A).

Object of the Conspiracy

The object of the conspiracy was to retaliate against a Saudi Arabian male, an international student, whose name is known to the Grand Jury, who defendants believed was attending school at UCO on September 19, 2014, and accuse him of a purported suicide bombing at a Christian church in Edmond, Oklahoma, because of statements made by that Saudi Arabian male against both defendants.

MANNER AND MEANS

The object of the conspiracy was accomplished as follows:

- a. **ISRAA JAFAR ALI** made a cellular phone call to the Edmond Police Department (EPD) on September 19, 2014, at approximately 9:19 p.m., to report that a terrorist act may occur in Edmond, Oklahoma.
- b. The officers at EPD called back **ISRAA JAFAR ALI** at 9:33 p.m. and 9:45 p.m. at the number she provided. On September 19, 2014, during these conversations she told the officers that the Saudi Arabian male would commit a suicide bombing at a Christian church near UCO

campus in two to three weeks. She indicated that the Saudi Arabian male, an international student, would strap on an explosive device containing nails to kill a number of people.

- c. The cellular phone used by **ISRAA JAFAR ALI** was provided by **SAJJAD HUSSAIN AL FEHAIDAH**. The first cellular phone call originated from **SAJJAD HUSSAIN AL FEHAIDAH**'s Edmond apartment. The return calls made by EPD were answered by **ISRAA JAFAR ALI** while she was still at **SAJJAD HUSSAIN AL FEHAIDAH**'s Edmond apartment.
- d. During the phone conversation between **ISRAA JAFAR ALI** and EPD officers, **SAJJAD HUSSAIN AL FEHAIDAH**, accessed his Facebook account, and related biographical details of the Saudi Arabian international student, who they believed was currently attending the language school at UCO, to **ISRAA JAFAR ALI**, who in turn provided these details to EPD.

OVERT ACTS

- a. **SAJJAD HUSSAIN AL FEHAIDAH** provided the cellular phone to **ISRAA JAFAR ALI** on September 19, 2014, which **ISRAA JAFAR ALI** used to place the call to EPD.
- b. Defendant **ISRAA JAFAR ALI** placed a cellular phone call to EPD on September 19, 2014.

- c. **SAJJAD HUSSAIN AL FEHAIDAH** accessed his Facebook account to research biographical information on the Saudi Arabian male, to provide to **ISRAA JAFAR ALI**.
- d. The Grand Jury realleges and incorporates by reference all statements and allegations contained in Count 2, as though fully set forth herein.

All in violation of Title 18, United States Code, Section 371, and Title 18, United States Code, Section 2(a).

COUNT 2
(Terroristic Hoax)

On or about September 19, 2014, in Oklahoma County, Oklahoma, in the Western District of Oklahoma, the defendants,

-----**ISRAA JAFAR ALI,**
SAJJAD HUSSAIN AL FEHAIDAH,
a/k/a CJ,-----

knowingly and intentionally engaged in conduct through cellular phone calls and statements to law enforcement with the intent to convey material false and misleading information, that is a suicide bomber would detonate an explosive (a bomb laden vest with nails) and this act would take place in two to three weeks time, in a place of public use, a Christian church, near the UCO campus, with the intent to cause death or serious injury, which threat, under the circumstances law enforcement reasonably believed, thus constituting a violation of Chapter 113B of Title 18, United States Code, Section 2332f(a)(1)(A).

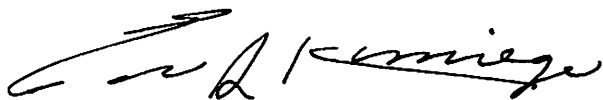
All in violation of Title 18, United States Code, Section 1038(a)(1), the penalty for which is found at Title 18, United States Code, Section 1038(a)(1)(A), and Title 18, United States Code, Section 2(a).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "Ronald R. Allen". The signature is fluid and cursive.

FOREPERSON OF THE GRAND JURY

SANFORD C. COATS
United States Attorney

A handwritten signature in black ink, appearing to read "Edward J. Kumiega". The signature is cursive and somewhat stylized.

EDWARD J. KUMIEGA
Assistant U.S. Attorney

CRIMINAL COVER SHEET

U.S. District Court, Western District of Oklahoma

Petty Misdemeanor Felony

Case No. **CR 15-043 F**

Number of Counts 2 Number of Defendants 2 USAOID No. _____ By: jlr

INDICTMENT

Sealed: Yes No OCDEF: Yes No Notice Summons Writ Warrant to Issue

DEFENDANT: ISRAA JAFAR ALI		MAR 03 2015	
Alias(es):		Address:	
		Phone:	
Age&DOB: 19, XX/XX/1995	SS#: XXX-XX-8147	Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
SEX: M <input type="checkbox"/> F <input checked="" type="checkbox"/>	RACE: White	Language/Dialect: English	

Defendant Status:

<input checked="" type="checkbox"/> Not in Custody	Type of Bond Recommended on this Charge:
	OR <input checked="" type="checkbox"/> Cash <input type="checkbox"/> 10% <input type="checkbox"/> Unsecured <input type="checkbox"/> Surety <input type="checkbox"/>
Bond set at: \$ _____ Date: _____	Bond in Amount of: \$ _____
Current Bond on Other Charge Federal <input type="checkbox"/> State <input type="checkbox"/>	
<input type="checkbox"/> In Jail at: _____	Under Prisoner/Register No.: _____ Detention <input type="checkbox"/>

Prior Proceedings or Appearance(s) Before U.S. Magistrate Judge:

Case No. M- 15-35-SM	Government Motion to Detain: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Complaint: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Bond Set: _____ Date: 02-06-15

Related Case Information:

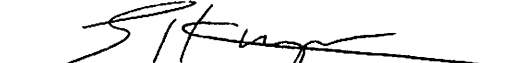
Previous Case No. 15-MJ-1010	Rule 20/Rule 5 from District of : Middle District of Tennessee
Additional Defendants: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Total Number of defendants: 1

RECEIVED
MAR 03 2015

Attorney Information:

Defense Counsel:	AUSA: Edward J. Kumiega	BY CARMELITA REEDER SHINN CLERK, U.S. DISTRICT COURT
Address:	Phone: 405/553-8700	Fax: 405/553-8888
Phone: _____	Fax: _____	Federal Agent/Agency: FBI
Retained <input type="checkbox"/> CJA Panel <input type="checkbox"/> Public Defender <input type="checkbox"/>	Local Agent/Agency: _____	

Count(s)	USC Citation(s)	Offense(s) Charged	Penalty
1	18 U.S.C. § 371 and 18 U.S.C. § 2(a)	Conspiracy to Commit a Terroristic Hoax, Aiding and Abetting	NMT 5 years imprisonment, \$250,000 fine, or both, NMT 1 year S/R; \$100 S/A
2	18 U.S.C. § 1038(a)(1) and 18 U.S.C. § 2(a)	Terroristic Hoax, Aiding and Abetting	NMT 5 years imprisonment, \$250,000 fine, or both; NMT 1 year S/R; \$100 S/A

Date: 3-2-15 Signature of AUSA: 

CRIMINAL COVER SHEET

U.S. District Court, Western District of Oklahoma

Petty Misdemeanor Felony

Case No. CR 15-043

Number of Counts 2 Number of Defendants 2 USAOID No. _____ By: jr

INDICTMENT

Sealed: Yes No OCMET: Yes No Notice Summons Writ Warrant to Issue

DEFENDANT: SAJJAD HUSSAIN AL <u>FEHAIDA H</u>		MAR 03 2015	
Alias(es): CJ		Address:	
		Phone:	
Age&DOB: 23, XX-XX-1991	SS#: XXX-XX-XXXX	Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
SEX: M <input checked="" type="checkbox"/> F <input type="checkbox"/>	RACE: White	Language/Dialect: English	

Defendant Status:

<input checked="" type="checkbox"/> Not in Custody	Type of Bond Recommended on this Charge:
	OR <input type="checkbox"/> Cash <input type="checkbox"/> 10% <input type="checkbox"/> Unsecured <input checked="" type="checkbox"/> Surety <input type="checkbox"/>
Bond set at: \$ _____ Date: _____	Bond in Amount of: \$ 25,000.00
Current Bond on Other Charge Federal <input type="checkbox"/> State <input type="checkbox"/>	
<input type="checkbox"/> In Jail at: _____	Under Prisoner/Register No.: _____ Detention <input type="checkbox"/>

Prior Proceedings or Appearance(s) Before U.S. Magistrate Judge:

Case No. M- 15-35-SM	Government Motion to Detain: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Complaint: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Bond Set: \$25,000.00 Date: 02-06-15

Related Case Information:

Previous Case No. _____	Rule 20/Rule 5 from District of: _____
Additional Defendants: Yes <input type="checkbox"/> No <input type="checkbox"/>	Total Number of defendants: _____

Attorney Information:

Defense Counsel: Tony Lacy	AUSA: Edward J. Kumiega	BY <u>CARMELITA REEDER SHINN</u> CLERK, U.S. DISTRICT COURT DEPUTY
Address: 215 Dean A. McGee, Room 109 Oklahoma City, OK 73102	Phone: 405/553-8700	Fax: 405/553-8888
Phone: 405/609-5930	Fax: 405/609-5932	Federal Agent/Agency: FBI
Retained <input type="checkbox"/> CJA Panel <input type="checkbox"/> Public Defender <input checked="" type="checkbox"/>	Local Agent/Agency: _____	

Count(s)	USC Citation(s)	Offense(s) Charged	Penalty
1	18 U.S.C. § 371 and 18 U.S.C. § 2(a)	Conspiracy to Commit a Terroristic Hoax, Aiding and Abetting	NMT 5 years imprisonment, \$250,000 fine, or both, NMT 1 year S/R; \$100 S/A
2	18 U.S.C. § 1038(a)(1) and 18 U.S.C. § 2(a)	Terroristic Hoax, Aiding and Abetting	NMT 5 years imprisonment, \$250,000 fine, or both; NMT 1 year S/R; \$100 S/A

Date: 3-2-15

Signature of AUSA [Signature]