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I. INTRODUCTION

Two weeks before his arrest in this case, Mustafa Alowemer celebrated his graduation from Brashear High School. After coming to the United States with his family in August 2016, he worked extremely hard to complete four years of credits in three years before he aged out of the primary public education system. He was a leader in his classes, helping fellow students learn English like he had. In many ways, he was living a relatively normal teenage life in the United States. He had friends, he drove a car, and he volunteered for a local organization that helped refugees. He had just been accepted to the Community College of Allegheny County (“CCAC”) and he was looking forward to getting an engineering degree. On the outside, Mustafa had accomplished so much and come so far from what he and his family had endured before they arrived in the United States.

In early 2011, when Mustafa was 12, he and his family were living in their home city of Dara’a, Syria. At the time, protests across the Middle East erupted in what would become to be known as the Arab Spring. In some countries, the protests and subsequent regime change was relatively peaceful. That was not the case in Syria. When the protests in Syria began in Dara’a, the Syrian military reacted with extremely violent and repressive tactics against the local Sunni Muslim population. The civil war that erupted in Syria obliterated the only happy and secure life Mustafa had known. Soon after the conflict started, soldiers came to his home, threatened him and his family at gun point, and shattered his father’s leg. Mustafa, as the eldest child and son, was thrust into the role of provider for his family. He

was forced to abandon his schooling and brave the daily dangers of being targeted by Syrian soldiers every time he left his home. The unspeakable atrocities and inhumane treatment that Mustafa witnessed and personally endured left an indelible mark. Outwardly, Mustafa remained strong for his family. But inwardly, he was, in many ways, broken.

In the United States, although he had left his war-torn homeland years before, he continued to closely monitor news on his phone. News reports, videos, and posts by family and friends still in Syria consumed him. Mustafa turned to the deep recesses of the internet to connect with the homeland he felt he had abandoned. During his bouts of depression, he would lock himself in his room unable to eat and obsessively combing through online information about the conflict. He began following Facebook accounts committed to the fight against the Assad-Syrian regime, which included the ISIS forces opposing the Assad regime. Teachers in school observed how his mood would swing based on news he learned online, with one teacher recalling Mustafa showing her photos from his phone of the bloody bodies of his murdered family members. His mental and emotional anguish culminated in an incident on February 12, 2019. That day he learned that family members and friends had been killed in Syria. A teacher overheard him say he wanted to kill himself. He was immediately sent to the nurse's office, where he complained of aches all over his body. He told a school representative about the hopelessness and guilt he felt living in the United States while good people – his people – were dying every day. He was sent home, but he did not seek any follow-up

treatment, which is not uncommon among refugees with PTSD. Three-and-a-half weeks after his serious psychotic episode, an undercover FBI agent posing to be a member of ISIS befriended him on Facebook. Three-and-a-half months later, he was in jail, where he remains today.

On September 16, 2021, Mustafa pled guilty to one count of material support of a foreign terrorist organization. Consistent with his immediate and robust admission to FBI agents on the day of his arrest, Mustafa accepted responsibility for his actions, expressed remorse for what he did, and forewent numerous constitutional rights in order to convey to the Court and community how sorry he was for his crime. Close friends and family who have remained in touch with Mustafa submitted letters with this memorandum detailing how he has apologized to them for his actions and acknowledged how misguided he had become in the months leading up to his arrest. He is resigned to his fate of further incarceration and eventual deportation and is ready to receive judgment by this Court.

Defense counsel calculates his advisory Guideline range at 78 to 97 month's imprisonment. The government and probation office calculate his advisory Guidelines at 240 months because they argue that Mustafa is subject to the terrorism enhancement under Guideline Section 3A1.4. Undersigned counsel remain steadfast that the terrorism enhancement does not apply to his case but, regardless how the Court rules on that issue, a sentence within the non-3A1.4 enhancement range is an appropriate resolution in this case. Such a result would be appropriate for four primary reasons. First, Mustafa's mental and emotional

condition at the time of his offense – namely, his well-established PTSD, complex PTSD, and major depressive disorder – warrant a downward departure and/or variance. Second, Mustafa’s future immigration consequences as a result of his conviction represent collateral punishment above and beyond that contemplated by the Guidelines, and also serve to mitigate any concerns about future recidivism and danger to the community. Third, the online and social media environment designed and perpetrated by ISIS and similar groups have a long-documented history of distorting religious obligation and recruiting traumatized and disaffected young men like Mustafa. Mustafa fell prey to those forces, and that mitigates his culpability in this case. And lastly, Mustafa’s incarceration in local county jails for the past 3.5 years during the COVID-19 pandemic, and as a foreign-born, non-English speaking, Muslim man charged with a terrorism offense resulted in him enduring an unusually harsh term of pretrial confinement that warrants a downward variance. Put together, a sentence between 78 and 97 months, followed by his eventual deportation, would be a sentence consistent with other similar cases around the country and which is sufficient but not greater than necessary to satisfy the purposes of punishment in this case.

II. APPLICABLE LEGAL STANDARDS

a. Generally

This Court has “broad discretion” in imposing a sentence. *United States v. Booker*, 543 U.S. 220, 233 (2005). While the Court must consider the United States Sentencing Guidelines (“Guidelines”) when fashioning a sentence, it may not

presume that a sentence within the advisory Guideline range is appropriate. *Gall v. United States*, 552 U.S. 38, 50 (2007). In that sense, the Guidelines are merely a “starting point” for the Court’s consideration of an appropriate sentence. *Id.* at 49.

When imposing a sentence, the Court must ensure that it is “sufficient, but not greater than necessary” to achieve the goals of sentencing, with particular attention paid to the defendant’s “history and characteristics.” 18 U.S.C. § 3553(a), (a)(1). “In view of the widespread incarceration rates and their unnecessary, deleterious effect on individuals sentenced, their family, society and our economy, parsimony in incarceration is to be prized.” *United States v. Ramirez*, 2018 WL 1221129, at *3 (E.D.N.Y. 2018).

b. Departures

A sentencing court may depart from the applicable Guideline range if there is a mitigating circumstance “of a kind, or to a degree, not adequately taken into consideration [in the] guidelines.” U.S.S.G. § 5K2.0. For example, the Court may depart if it finds that the defendant’s “mental and emotional conditions[,] ... individually or in combination with other offender characteristics, are present to an unusual degree and distinguish the case from the typical cases covered by the guidelines.” U.S.S.G. § 5H1.3.

c. Variations

A sentencing court must consider the relevant Section 3553(a) factors in determining the appropriate sentence. *United States v. Gunter*, 462 F.3d 237, 247 (3d Cir. 2006). Even if a court finds that a particular circumstance does not warrant

a formal departure under the Guidelines, those same facts may nevertheless support a valid basis for a variance below the advisory Guideline range. *See United States v. Vazquez-Lebron*, 582 F.3d 443, 447 (3d Cir. 2009) (finding that district court's consideration of same factors for departure and variance is appropriate).

i. Mental and Emotional Condition

As stated above, the Court may consider a defendant's "mental and emotional conditions" in determining whether a departure is appropriate. U.S.S.G. § 5H1.3. Likewise, under Section 5K2.13, a court may depart downward from the advisory Guideline range if "(1) the defendant committed the offense while suffering from a significantly reduced mental capacity; and (2) the significantly reduced mental capacity contributed substantially to the commission of the offense." U.S.S.G. § 5K2.13. If those conditions do not warrant a departure, the Court may nonetheless consider those circumstances when granting a downward variance under Section 3553(a). *See, e.g., Hicks v. United States*, 2017 WL 412644, at *5 (D.N.H. 2017) (noting "the court expressly found that Hick's PTSD warranted a downward variance" in a bank robbery case); *United States v. Oliver*, 2022 WL 2188967, at *4 (M.D. Ala. 2022) (granting downward variance to jail guard who beat handcuffed prisoners because the defendant's PTSD made him "no less deserving of leniency"); *United States v. Lovato*, 798 F. Supp. 2d 1257, 1259-60 (D.N.M. 2011) (downward variance granted in case involving woman with possible PTSD); *United States v. Taylor*, 736 Fed. App'x 216, 222 (11th Cir. 2018) (variance for defendant's PTSD was not an abuse of discretion); *United States v. Elk*, 2021 WL 1575209, at *1

(D.S.D. 2021) (acknowledging the sentencing court granted a “substantial downward variance” after considering – among other factors – the defendant’s “mental and emotional condition”).

ii. Deportability

Deportation is a significant hardship. *See Padilla v Kentucky*, 559 U.S. 356, 364 (2010) (noting that “deportation is an integral part – indeed, sometimes the most important part – of the penalty that may be imposed on noncitizen defendants who plead guilty to significant crimes.”). The Third Circuit has recognized that a defendant’s deportability status may be taken into account under Section 3553(a) and warrant a downward variance as a collateral consequence of conviction not taken into account under the Guidelines. *See United States v. Jimenez*, 328 Fed. App’x 802, 804 (3d Cir. 2009); *see also United States v. Thavaraja*, 740 F.3d 253, 262-63 (2d Cir. 2014) (“[A] district court may take into account the uncertainties presented by the prospect of removal proceedings and the impact deportation will have on the defendant and his family.”); *United States v. Flores-Olague*, 717 F.3d 526, 535 (7th Cir. 2013) (“A sentencing court is well within its prerogatives and responsibilities in discussing a defendant’s status as a deportable alien.”). Also, courts have found that a defendant’s deportability warrants a downward variance because the need to protect the public from future crimes is diminished under Section 3553(a)(2)(C). *United States v. Morales-Uribe*, 470 F.3d 1282, 1287 (8th Cir. 2006) (“Arguably the need to protect the public from a defendant may be reduced in a case where, upon immediate release from incarceration, the Government will

deport the defendant.”); *United States v. Ramirez-Ramirez*, 365 F. Supp. 2d 728, 732-33 (E.D. Va. 2005) (“When a defendant will be removed and sent out of the country, there is less need for the sentence imposed to protect the public from further crimes of the defendant, or to provide the defendant with needed educational or vocational training.”).

iii. Harsh Conditions of Pretrial Confinement

Harsh conditions of pretrial confinement may also serve as a basis for a variance at sentencing. *United States v. Sutton*, 973 F Supp. 488, 493 (D.N.J. 1997), *aff’d* 156 F.3d 1226 (3d Cir. 1998) (“Unusual pretrial confinement ... in either length or severity of condition, can properly be considered by the sentencing court.”); *United States v. Pacheco*, 67 F. Supp. 2d 495, 498 (E.D. Pa. 1999); *see also United States v. Pressley*, 345 F.3d 1205, 1218 (11th Cir. 2003) (“[C]onditions of confinement could provide a basis for departure, since this factor was apparently not taken into account by the Sentencing Commission and could be unusual enough to take a case out of the heartland of the applicable guideline.”); *United States v. Carty*, 264 F.3d 191, 196 (2d Cir. 2001) (same).

In the context of the COVID-19 pandemic, courts in this District have varied below the Guidelines in at least four cases as a result of harsher presentence confinement conditions at the local jails contracted with the U.S. Marshals. *See* Statement of Reasons, *United States v. Hurt*, Case No. 17-cr-285 (NBF) (Nov. 6, 2020) (granting variance, in part, because defendant “served time during COVID-19 with protocols in place, making it more onerous and also restricted access to

programming”); Statement of Reasons, *United States v. Stevens*, Case No. 18-cr-32 (NBF) (Nov. 5, 2020) (same); Sentencing Hr’g, *United States v. Reddix*, Case No. 19-376 (JFC) (Mar. 18, 2021) (granting variance, in part, because of “horrible conditions with the lock down” because of the “the inability to see loved ones [and] inability to have more frequent phone calls with family,” as well as the lack of programming); Sentencing Hr’g, *United States v. Cox*, Case No. 18-cr-50 (DSC) (May 18, 2021) (granting variance, in part, based on the “limitations on [defendant’s] liberty that prisoners normally have” in jail).

iv. Refugee Status and Traumatic Life Events

Lastly, a defendant’s “status as a refugee” and “traumatic life history” may also be considered by a court in granting a downward variance from the advisory Guideline range. *Yuot v. United States*, 2011 WL 1542064, at *1 (N.D. Iowa 2011).

III. SECTION 3553(a) FACTORS

Pursuant to Title 18, United States Code, Section 3553(a), the Court, in determining the sentence to be imposed, must consider (1) the nature and circumstances of the offense and the history and characteristics of the defendant, (2) the need for the sentence imposed, (3) the kinds of sentences available, (4) the kinds of sentences and the sentencing range established under the Guidelines, (5) any pertinent policy statement under the Guidelines, (6) the need to avoid unwarranted sentencing disparities, and (7) the need for restitution. 18 U.S.C. § 3553(a). This section will address the factors relevant to Mustafa’s sentencing in this case.

a. **Mustafa's History and Characteristics**

i. **Childhood Before Syrian Civil War**

“We loved to live ... We used to play together; we went to school together. My family lived a simple, happy life. When the war started – it was a huge different thing. We never thought something like that would happen.”

-Shahid Alowemer (Mustafa's younger sister)

Mustafa was born in Dara'a, Syria on June 5, 1998 to his parents Fatmeh and Mousab Alowemer. He was the first-born child and son to his parents, which has carried with it an added responsibility and expectation within his family throughout his entire life. He has a close relationship with his three younger siblings – Shahid (sister, 22), Hammam (brother, 18) and Y.A. (brother, 13) – who have looked up to him for support during the difficult events his family has been through.

The Alowemer family was relatively poor in pre-war Syria. His mother worked in a clerical role for a local government agency which issued personal identification cards. His father worked in residential construction, where he was able to hire two employees to mix cement. They lived in the 40th District in Dara'a, Syria, also known as Hay al-Arbeen District. Dara'a is an ancient city nestled in the southwest corner of Syria, and is situated in the governate that borders both Israel and Jordan. References to the city of Dara'a can be found in ancient Egyptian hieroglyphics, as well as in the Torah.

Mustafa described a typical day in his pre-teen life: wake up, eat breakfast that his mother prepared, and walk to school with his younger sister Shahid. His

aunt writes about Mustafa, and his reputation as a young student in Dara'a. Letter from Asia Abdul Karim Awaimer (Mustafa's aunt) ("Ex. D" at 1). ("We, his relatives and his family, testify that he was a great helper to the neighbors when they need help, and he is a popular young man among his schoolmates. He was one of the contributors to cleaning and plant the school garden, and who respected and loved the teachers in the school."). Likewise, a close family friend writes that Mustafa was "one of the students who respected his teachers and colleagues the most" and that "[e]ven though he was a small child, he motivated me a lot to work and help my family." Letter from Nora Hassan Fares (Ex. D at 2). After school, he would come home and eat dinner with his family, and then meet friends to play soccer or tag in the streets (the local children named their soccer team after Real Madrid). After playing with his friends, he would come home and do his school work. Evenings were spent with family on the balcony while the adults drank tea. Mustafa was known for his unusual willingness to help his mother with cleaning chores; as the eldest son in the family, household cleaning was typically not something he was expected to do.

Those that knew Mustafa when he lived in Syria universally describe him as a kind and caring boy who looked out for family, friends, and animals. For example, his cousin Rania writes about how much he cared for his grandmother, as well as her brother when he fell ill:

His grandmother was sick and he was keen to take care of her as she was bedridden. Mustafa used to visit her several times daily, bring her what she needs, prepare her food, give her the medicine she requires constantly, and take her to the garden of the house to entertain herself. Moreover, in an

unforgettable situation, brother Khaldoun fell into a sudden health condition, and Mustafa quickly called an ambulance, escorted us to the hospital, and donated blood to my brother, as he was one of the biggest reasons behind my brother's recovery.

Letter from Rania Muhammad Al-Nuaimi (Ex. D at 3). His childhood friend, Ismael Fares, writes about moving to Dara'a after his father died and how Mustafa looked after him and made sure he was included with the other kids in the neighborhood.

Letter from Ismael Fares (Ex. D at 4) ("He used to help me a lot when I used to get bullied at school and when we used to play in the neighborhood because I was not from the same city, he used to always be by my side, and when kids didn't allow me to play with them, he would ask me to play with him."). His uncle Omar, who was Mustafa's mother's youngest brother, spent much time with Mustafa during his childhood and tells the following story: "In the summer of 2003, in a desert area in the town of Nasib, on the Jordan border, we were together on a bike. ... We saw a dog that almost died of thirst, in a place where there is no water. I did not dare to approach him for fear because he was fierce. Mustafa ventured to catch him and brought him home to give him water and raised him." Letter from Omar Abdel Karim Al-Awaimer (Ex. D at 6).

We are all shaped – to some extent – by the political and world events that occur during our lifetimes. While most people experience those events in indirect and incidental ways, the Alowemers could not have been more acutely impacted by events outside of their control in 2011. That spring, young students in Dara'a, Syria scrawled graffiti on a wall in their school criticizing the Bashar al-Assad regime. What followed was one of the largest humanitarian disasters ever recorded.

Mustafa's experience during the years that followed would disrupt his tranquil life and change him forever.

ii. Syrian Civil War and Family Trauma

"Mustafa did not have a childhood because of the war."
-Letter from Abdullah Al-Awaimer (Ex. D at 7)

Details of the Syrian civil war and the damage it wrought on the country and people are set forth in reports submitted with this memorandum. *See* Report by Daniel Masterson, Ph.D. at 3-9 ("Ex. B"); Report by Lucy Guarnera, Ph.D. at 7-9 ("Ex. A"). The brutality of that war and the war crimes committed against the civilian population during the conflict are well documented and common knowledge. Counsel will not write anew everything that befell the Syrian people and the Alowemer family here, but a brief summary is necessary to shed light on the upheaval and trauma experienced by Mustafa and his family. Dr. Masterson briefly addresses the origins and scale of the conflict:

Some of Syria's earliest pro-reform (and later, anti-government) protests began in Dara'a. ... Despite pro forma public statements about mediation and compromise, the government's response in Dara'a was violence, repression, sieges, and misinformation. The government cast peaceful protests and sit-ins as violent Islamist gatherings and responded with snipers and curfews. Throughout the first few months of protests, sieges, and curfews, Syrian armed forces killed hundreds of civilians, including those at sit-ins and at random in the streets.

...

What began in Syria in 2011 with street demonstrations and calls for political reforms deteriorated into a government crackdown and subsequent civil war. Estimates of the death toll in Syria's war vary but many organizations put the figure well over 500,000, in addition to an even larger number of people wounded and permanently handicapped. Large sections of the country's cities are now in ruins, destroyed by government bombardment. ... The civil war led to an enormous refugee crisis. Millions of people have fled to Lebanon, Jordan, Turkey, Iraq, Egypt and beyond. Using UN registration

numbers, which provide a conservative estimate of displacement, four million Syrians have fled to neighboring countries and eight million are displaced inside Syria. In total, this means that more than half of Syria's pre-war population of 23 million people has been displaced by this conflict. This is one of the largest refugee crises in the 20th century both in terms of absolute number and as a share of the country's population.

Masterson Report at 3-5.

Mustafa reported that shortly after the conflict began, Assad forces implemented a lockdown of his community in Dara'a for approximately 2 weeks. PSR ¶ 62. His family could not leave their home and had little to eat. *Id.* During the lockdown, government soldiers would force their way into homes, interrogate and torture civilians, and terrorize people in hopes of rooting out those who opposed Assad. *Id.* This happened on multiple occasions to the Alowemer family. Guarnera Report at 8. Mustafa – who was 12 years old at the time – reports that soldiers came to his family's home, put a gun to his head, threatened his life, and permanently maimed his father, shattering his leg. *Id.* Mustafa's father describes the incident, and the aftermath, as follows:

At that time, I was injured due to a hit by a Syrian soldier in my leg that made life very hard for me and my family back there. Because of that injury, I did not have a choice but watching my wife and 13 years old son work to make life easier for all of us. Mustafa was a child when held a huge responsibility because he saw me suffering from my injury. I could not work for so many years after my injury and Mustafa had to keep on carrying on that huge responsibility and taking care of the family after his mom stopped working in Jordan.

Letter from Mousab Alowemer (Ex. D at 8). Mustafa's sister, Shahid, described another raid where the family was forced to line up against the wall while soldiers ransacked the home. Guarnera Report at 8 ("She explained that they believed themselves to be moments from death, as soldiers typically made victims face the

wall before shooting them in the back.”). Mustafa and his family report how they braved the constant fear of gunfire, explosions, and strikes from above while locked in their home. *Id.* (“His sister, in a school essay, recounted staying awake at night and listening to the bombs falling around them, counting the seconds between each bombs’ release and impact (‘I covered my head in the blanket, waiting for either my death or the sound of the shell somewhere else’).”). Mustafa reports that the military would intentionally contaminate the water supply in their neighborhood by placing dead animal carcasses in the water tanks. *Id.*

After the lockdown ended, Mustafa discovered that his entire world had been destroyed and turned into a warzone. The army converted his school into a military station. There were “[d]ead bodies everywhere.” *Id.* Mustafa described the extent of the carnage: “There is literally nothing that we did not see there.... You would see stuff that you never dreamed of seeing, even in your [worst] dreams.” *Id.* Soldiers occupying the city would “humiliate, threaten, assault, rape, shoot, and behead” adults and children alike with impunity. *Id.* As his mother explained, Mustafa was in particular danger because soldiers assumed young males like him were part of the perceived revolution. *Id.* (“Parents were locking down and completely quarantining their kids inside their homes, because of fear of the army coming and pulling these kids out and torturing them. We feared for our kids’ lives.... So many kids went missing.”).

Despite the danger to Mustafa, as the eldest son and with his father nursing his debilitating injury, he went to work to support his family. His mother writes to explain the burden Mustafa took upon himself at the outset of the war:

At the beginning of the war, when he was twelve years old, he always helped deliver food, bread, vegetables, and medicine to neighbors and families in need. He always helped me bring vegetables and fruits when his father was injured at the beginning of the war. I remember at the beginning of the war when the schools were closed, life became very difficult and there was no source of livelihood at all. I used to go to work in the fields and gather vegetables despite the dangers of bullets and planes. He used to help me. ... He would bring food to the family every day and at some point, he asked me not to go work in the fields anymore. He asked me to just stay at home to take care of his father, his grandmother, and siblings. He told me that he would go to work and bring money, and he would. When there was no work, he would go to collect mushrooms from the plains and sell them to people, and he would never come home empty-handed. He was an example of a good son.

Letter from Fatima Abdul Karim Al-Awaimer (Mustafa's mother) (Ex. D at 10).

Mustafa – still 12 or 13 years old – recalls riding the bus to the fields thinking, “I am a man now. I have to take care of my family.” Guarnera Report at 9. In the fields, his life was no less in danger, as Assad's soldiers would shoot at farm workers thinking they were rebels looking for food. *Id.* On one occasion, he ventured too far into a bean field and found 10 corpses piled on top of one another. *Id.*

Letters from his close family demonstrate that as an early teen he shouldered the burden while selflessly keeping his own strife to himself. Letter from Shahid Alowemer (Ex. D at 12) (“Your Honor, Mustafa suffered a lot and went through hard times, but he never showed it to anyone.”); Letter from Fatima Abdul Karim Al-Awaimer (Ex. D at 11) (“He did not show this struggle in front of us, for the sake of the family's happiness and for fear of his injured father's feelings. ... He always told

me, ‘what’s to come, is more beautiful, God willing.’”). Perhaps he believed that was the strong presence his family needed during the early days of the war, but it undoubtedly put a pressure on Mustafa that – over time – he was unable to bear.

iii. Refugee Camps and Life in Jordan

“After that, everyone’s life changed for the worse after we became refugees. Most of the children were deprived of schools, and Mustafa was one of them. He was deprived of his childhood and his studies. He did not go to school, because he had to help his father, he worked and helped his mother as well.”

-Letter from Mahmoud Fares (Ex. D at 14)

After moving from their home in Dara’a to Mustafa’s uncle’s home in Jaleen (in the outskirts of Dara’a), the fighting resumed and, in 2013, the Alowemers made the decision to flee their homeland for Jordan. Mustafa was 14 years old. During his pretrial interview, Mustafa explained the multi-step journey that his family took to reach the border. First they took a taxi, then they were loaded on a truck, and then they were forced to run the final several hundred yards to reach the safety of the Jordanian side of the border. PSR ¶ 63. By becoming refugees in Jordan, however, the Alowemers traded the danger from Assad’s forces with the danger of discrimination and maltreatment by the Jordanian authorities. It was a trade the Alowemers were willing to make, but it did not come without grave costs.

In connection with this sentencing memorandum, Dr. Masterson authored a report on the Syrian refugee crisis with specific focus on the common experiences among Syrians living in Jordan after fleeing their country. Counsel will highlight some relevant points made in Dr. Masterson’s report here:

- “Syrians settled in Azraq and Za’atari camps were subject to severe restrictions on their movement. ... They were only allowed to permanently move out of the camps with a Jordanian sponsor, a process evocatively referred to as ‘bailing out’ a Syrian.” Masterson Report at 12.
- “Syrians in Jordan face widespread economic hardship, poverty is prevalent both inside and outside of the refugee camps. ... Syrians generally faced higher prices and higher rent outside of camps and received fewer services from humanitarian organizations outside of camps.” *Id.* at 14.
- With respect to substandard housing outside the camps, many “mentioned asthma and other chest ailments from moldy rooms with high humidity, water-borne diseases and skin rashes from polluted river water, mosquito-borne diseases, insect bites, and bone diseases due to a lack of sunlight in living quarters.” *Id.* at 15.
- Schooling for Syrian children in Jordan was met with multiple obstacles: (1) discrimination against Syrian children by school administrators was rampant, (2) bullying by other students, (3) the opportunity cost of putting child in school versus working to support family, (4) high cost of tuition, and (5) high cost of transportation to school. *Id.* at 16-17.
- “Another major challenge that Syrians report is fear of being detained by authorities for improper documentation. Traveling even short distances may involve passing through checkpoints or being confronted by police in another way.” *Id.* at 19.

The Alowemers experienced much of what is reported by Dr. Masterson.

Upon their arrival in Jordan, the Alowemers were placed in the Za’atari refugee camp. It was dangerous there as it was overrun with wild dogs and, occasionally Jordanians – angry about the immigration crisis at their border – would spray gunfire into the camps. Every day, Mustafa walked long distances to obtain water and what small daily rations were provided to the refugee population. His aunt, Najah Aqla Al -Awaimer, writes about how Mustafa distinguished himself at the

Za'atari refugee camp. Letter from Najah Aqla Al -Awaimer (Mustafa's aunt) (Ex. D at 15) ("In the camp, he was carrying gas cylinders in a cart and delivered them to them in front of the caravans. Also, in the Zaatari camp, ... [h]e used to carry water in a bucket and deliver it to its owners"). Within a matter of weeks (or perhaps a couple months), the family reconnected with family in Jordan and were able to move out of the camp.

Life outside the camp was marginally better, but not by much. With his father still unable to work, his parents decided to keep Mustafa out of school so he could work to support the family. His uncle writes, "Mustafa was the main caregiver to his family. He takes care of his younger siblings, mother, and his fathers even though he was young, he was capable of the responsibility that has been placed upon him." Letter from Abdullah Al-Awaimer (Mustafa's uncle) (Ex. D at 7). At age 14, however, and with no valid work permit, Mustafa's foray into the local work environment was treacherous.

His sister writes about a serious work injury he sustained performing manual labor: "He suffered a lot with his small body in Jordan when he used to work very hard to help my day," citing to an instance when he injured his back so badly lifting a heavy item that he was not "able to control his tears." Letter from Shahid Alowemer (Ex. D at 12). He and his family reported the following to Dr. Lucy Guarnera during her interviews:

He reportedly worked in a variety of factory and manual labor jobs from ages 14 to 19, although he and his family spoke most of his difficult experiences in a leather factory. He recounted working with dangerous machines that "could easily chop your hand off," and being sent to desolate areas to clean hides

from animal carcasses, where the scent of blood attracted hyenas. He reflected, “It was terrible cleaning the animal skins: blood everywhere, stinks, get blood in your mouth. It was all about just getting used to it.” His mother recounted how she forced him to remove his clothing outside before permitting him to enter the house at the end of a shift because she found the stench so revolting, even though it “broke” her emotionally to treat her son in this manner while he was suffering to support the family. His mother and sister also recounted that the harsh chemicals Mr. Alowemer used to clean the animal hides shriveled his skin and caused his fingernails to fall off, although he “never said a word, never complained,” as his mother put it.

Guarnera Report at 10. Consistent with Dr. Masterson’s report to the Court, in addition to the dangerous and substandard work conditions, Mustafa was subjected to harassment by local officials for working without a permit. He was arrested several times by local Jordanian authorities for working. During one of those arrests, Mustafa recalls being tortured by being strapped to a bedframe, kicked repeatedly by guards, threatened with guns, forced to urinate and defecate on himself, and fed inedible food. *Id.*¹ That incident almost resulted in his deportation, but fortunately a family member was able to intervene and prevent that from happening. *See id.*

In Jordan, Mustafa’s family first noticed his posttraumatic symptoms from all that he witnessed and endured. He reported to Dr. Guarnera that while he felt “numb” under “constant threat” in Syria, in Jordan he began having flashbacks, mood changes, sleep disturbance, and would avoid activities that reminded him of the atrocities he witnessed. *Id.* His mother and sister described his demeanor as

¹ It is worth noting that on June 19, 2019, upon his arrest in this case, Mustafa was transported to FBI offices on the southside of Pittsburgh. While in transit to the FBI’s offices, Mustafa asked FBI agents if they were going to kill him.

“sad, quiet, detached, isolated, and withdrawn.” *Id.* at 10-11. Despite Mustafa keeping his struggles to himself, his mother knew he was suffering because “[h]e was not living the same life as Jordanian kids or even refugees whose parents could work.” *Id.* at 11. The stories told by Mustafa and his family certainly capture the heavy burden he bore and the horrid work conditions he endured. But it must be understood that he lived under these circumstances for *over four years*, from ages 14 to 19. The effect that would have on Mustafa – during the most important years of his development – cannot be overstated.

iv. Asylum and Resettlement in Pittsburgh

“Since his childhood, the kids have loved the United States and watched American movies and series. When we came here, he was the happiest person in my family because he was accepted into the school and returned to the education system, and started studying.”

-Letter from Fatima Abdul Karim Al-Awaimer (Mustafa’s mother) (Ex. D at 10)

While in Jordan, the Alowemers applied for asylum to the United States. Their application was granted and, on August 1, 2016, they arrived in the United States. Mustafa had just turned 19 years old. Mustafa describes staring out the window for hours on end, amazed that “everything is green, there’s no sand.” Guarnera Report at 11. He was elated: “Literally, I thought it was heaven, I thought it was the best place ever. ... I couldn’t believe it. ... It was like the best days of my life. ... Land of the free!” *Id.* His family was resettled in the Northview Heights neighborhood of Pittsburgh.

The Alowemer and Fares family were neighbors in Dara’a and lived close to each other in Jordan after fleeing the country. Both families were granted

permission to seek asylum in the United States. Mahmoud Fares writes about learning they would be able to leave Jordan:

Many families received calls to travel outside Jordan and my family as well as Mustafa's family were among the lucky ones. Mustafa's family never hesitated to travel, and they were very happy. In Jordan, Mustafa's family was tired and suffered a lot, so they were among the happiest people to leave for the United States. Mustafa was very happy that they will have many opportunities there, and one of the most important of these opportunities is to study and live in safety.

Letter from Mahmoud Fares (Ex. D at 14). Letter after letter submitted with this memorandum recount the pure joy that Mustafa felt coming to the United States. Letter from Ibrahim bin Abdul Karim Al-Awaimer (Mustafa's uncle) (Ex. D at 16) ("Mustafa jumped from joy to travel to the United States for a better life and to complete his studies, which he lost in Syria and Jordan."); *see also* Letter from Najwa Al-Masry (Alowemer family neighbor in Jordan) (Ex. D at 17); Letter from Ahmed Mohammed (former classmate) (Ex. D at 18); Letter from Nasreen Khalil Al-Loubani (Alowemer family neighbor in Jordan) (Ex. D at 19).

Mustafa immersed himself in his studies and relished the opportunity to further his education. Mahmoud Fares writes about how much Mustafa enjoyed school here in Pittsburgh. "[H]e told me that he is very happy and he studies hard. He told me that he has many friends in school and that he loves culture. He told me that his school is interested in showing cultures to all the different students in his school. That they show different cultures and hold celebrations every year." Letter from Mahmoud Fares (Ex. D at 14). His sister recalls how they took an English class at Carlow University together in the summer of 2018, and how she helped him

apply to CCAC and for financial aid: “he was very happy that I will never forget the smile on[] his face.” Letter from Shahid Alowemer (Ex. D at 12).

Mustafa did well in school and became a leader amongst his peers. Anne Meade, one of his teachers from 2017 to 2019 at Brashear High School, writes that Mustafa worked hard during and after school hours to graduate high school before he aged out. Letter from Anne Meade (Mustafa’s teacher) (Ex. D at 20). She also credits Mustafa for helping his fellow ESL students to ensure they were able to graduate as well. *Id.* (“Without Mustafa’s help, there are three of his former classmates that would not have graduated. He assisted them daily in English class.”). Likewise, Asiya Uwimana, a fellow student at Brashear, writes of an incident where Mustafa stood up for a Nepali student struggling with an assignment:

Mustafa was the kind of person that protected the other girls and stood up for what was right. I remember one time in one of the classes, the other students were making fun of one of the Nepali students who did not understand the assignment and was answering incorrectly. Every time the student read the answers, they would laugh at her. ... Mustafa told them to stop and reminded them that they were also in her shoes once. I really admired that because despite everyone else in the class finding the situation funny and laughing at the girl, Mustafa saw that it was wrong and stood up for her. I am also glad that ever since that incident, I did not witness any of the student’s making fun of another in class.

Letter from Asiya Uwimana (Ex. D at 22).



He completed high school in three years, using the final year to finish both 11th and 12th grades. He received multiple certificates for his academic achievements, including four honor role certificates, three language awards, a student of the month recognition, a Carlow University certificate for completing a high school/college immersion program, and multiple certificates from an sp2 automotive program. *See* Compilation of Certificates (“Ex. E”). At age 21, Mustafa graduated high school in May 2019. He applied for and was accepted to attend school at CCAC. *See* CCAC Acceptance Letter (“Ex. F”).



In many ways, Mustafa was able to live a semi-normal teenage lifestyle. “He made many friendships quickly with other young boys and girls his age. He always

participated in the celebrations that were held in school and outside school. He went to many of his friends' birthdays, and he brought in many gifts to his school friends. He liked to go on trips with his friends inside and outside the school. He loved everyone and everyone loved him back. He was very interested in his studies. He completed his high school intensively in three years and graduated with honors because he was very interested in his studies." Letter from Fatima Abdul Karim Al-Awaimer (Mustafa's mother) (Ex. D at 10).

Despite his responsibilities to his family, and his school schedule, Mustafa still felt compelled to help others in his situation. His friend Faisal writes about the charitable works Mustafa performed before his arrest. Letter from Faisal Adeb Al-Awama (Ex. D at 24) ("Mustafa and I worked to assist the Al-Ansar Association to help refugees from the affected countries. We worked together late at night, even though we were attending school. Mustafa was also helping the neighbors to drop off and take their children to school in his own car because we were in the same school."). Dr. Wiam Younes, Executive Director of ANSAR of Pittsburgh – which helps Syrian-refugee families who were resettled in Pittsburgh – writes about a trip she organizes for children in the Pittsburgh-Syrian community.

In 2018, I took a group of Syrian refugee youth on a trip to Ohio Pile [sic] for water rafting. Mustafa and his sister joined us. For the first time, I saw him as a young man having the thrill of his life. The responsibilities he carried heavily on his shoulder dissolved for two hours. He was extremely appreciative to experiencing such fun without feeling guilty about not working. Refugee children are handed responsibilities way above their age. They are guardians of their parents, without the right to make decisions, because they learn English much quicker than their parents and assimilate faster in the society.

Letter from Dr. Wiam Younes (Ex. D at 25.)



By most accounts, Mustafa was thriving. He was successful in high school and was accepted to attend community college. He was socializing well and had close friends. He was active in extracurricular activities and volunteered with organizations like ANSAR. He was an eldest son and brother in a family that had endured so many struggles – for years – but which had the good fortune to come to a country that protected them from many of the dangers and horrid conditions that had become commonplace. The successful life he had imagined before the war was back on the right trajectory. But beneath all the hallmarks for success was a young man who struggled mightily to cope with the trauma he endured, and the guilt he experienced of having left behind so many who did not survive. Through social

media, he was bombarded with news of Syria and his friends and family that were not so fortunate. It was a burden that was too great to bear.

v. Retriggered Trauma

“He explained that he had grown up in Syria during the war. He told stories of loss and life during the war. He expressed a sense of hopelessness. He grappled with the point of high school. Mustafa expressed a desire to go back to his country to help fight the war. ... He explained that he wanted to go back to help his people. He explained how it was unfair that he was safe in the US and his friends and family were dying in Syria.”

-Kaitlin Hensgreco, notes from nurse’s office, February 12, 2019 (“Ex. H”)

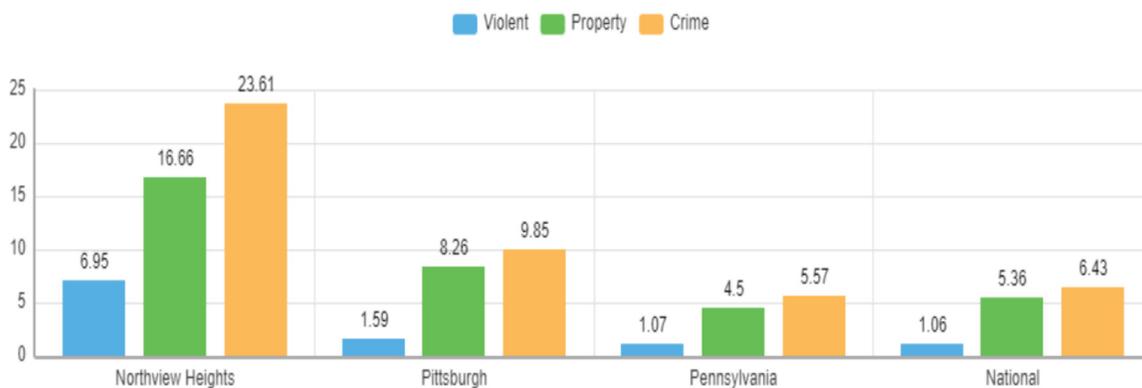
As detailed above, upon learning they were coming to the United States, the Alowemers – including Mustafa – were overjoyed. It provided an escape from the hell they endured for seven long years. It was the promise of a new life. But despite the reprieve from the war in Syria and the daily humiliation of living as a refugee in Jordan, the life they left behind in their homeland cast a long shadow. Mustafa’s past could not be unwritten. Whatever opportunities awaited him in this country, he was still the person who had experienced the displacement of war, endured the threats and torture and harassment for years, and who witnessed unspeakable atrocities. And although he left that world behind, it all still weighed heavily on Mustafa.

On August 1, 2016, the Alowemer family arrived in the United States. On August 30, 2016, Mustafa was evaluated at Squirrel Hill Health Center in connection with his initial refugee assessment. Although the physician assistant who evaluated him noted he “appears in good health,” the records reflect that

Mustafa reported “[f]eeling down, depressed or hopeless (several days).” Squirrel Hill Health Center Record (Aug. 30, 2016) (“Ex. G”). Not one month into the new life and promise offered by his grant of asylum, contemporaneous records demonstrate the persistent damage Mustafa carried with him to Pittsburgh.

The Alowemer family was settled in the Northview Heights neighborhood in Pittsburgh. Both Mustafa and his sister report they witnessed frequent crime and gun violence there. Guarnera Report at 11.

Daily Crime In Northview Heights (Per 100,000 People)



At home, his father continued to suffer from his leg injury and heart condition wrought by the war. That continued to hamper his ability to work, which required Mustafa to also maintain employment at a local restaurant while going to school. His mother experienced emotional episodes that – on at least one occasion – resulted in her fainting and breaking her nose. Letter from Fatima Abdul Karim Al-Awaimer (Mustafa’s mother) (Ex. D at 11). Luckily – and not surprisingly – Mustafa was there to help. *Id.* (“I can not forget that day, October 16, 2018, when I fell and fainted in my house that day, I did not realize what happened to me, and after I

regained consciousness, I screamed and the first person who saw me was Mustafa, who was crying and called the ambulance, and stayed with me in the hospital. That day, I broke my nose, and was crying when he saw me, and he was wiping the blood off my face and telling me: Don't be afraid, mom, you're fine. He took care of me until I got better. He did all the housework until my health improved.”). Mustafa also reported the continued stress of having to liaise with the refugee center, complete paperwork, and drive members of his family around the city for their appointments as needed. Guarnera Report at 11.

At school, Mustafa felt alienated from the broader student body because of his background and language barrier. Many students kept their distance from him, and others actively bullied him. He recounts instances where students would call him “terrorist” or “Osama bin Laden” simply because of his race and religion. *Id.* at 12. The school principal – Kimberly Safran – noted that whereas Mustafa’s sister was far more outgoing and willing to tell her story as a refugee, he was more reserved and guarded, which made it more difficult for school administrators to perceive a need for intervention. *Id.* at 11. Katie Daley – Mustafa’s English teacher for the first two years he attended Brashear – enjoyed a close relationship with Mustafa, even having dinner at the Alowemer’s home. On occasion, Mustafa would open up to her about what he had endured and would even show her images of his family home in Syria after it was reduced to rubble. Ms. Daley also observed Mustafa’s reliance on his cell phone, often consuming news media of the Syrian civil war, and social media communications about the well-being of family members. In

one instance, she recalls Mustafa needing his phone to learn how his uncle and cousin were doing; after reviewing his social media he learned they had been killed and he showed her their bloodied bodies. *Id.* at 12. She noted he was very sad that day. Christine Tapu – Mustafa’s ESL teacher throughout his time at Brashear – observed what she perceived as Mustafa’s survivor’s guilt, noting times when he would ask “why he made it to the U.S.” and “what he is doing here” when “people are dying all the time.” *Id.*

During Dr. Guarnera’s evaluation of Mustafa, he explained that he began accessing ISIS-associated social media because the people depicted on those sites “appeared to care deeply about helping Syrians” For example, much of what he viewed online “depicted ISIS as a volunteer force helping suffering Syrians (e.g., providing food or medical care to civilians).” Guarnera Report at 14. Feeling separated from everything he knew – literally and culturally – and experiencing the hopelessness and guilt of having survived the conflict, “he began to believe that he should also return to Syria to help his country.” *Id.*

His family observed Mustafa go through waves of depression. Mustafa’s moods appeared to fluctuate with news he would receive about family and friends that were killed or harmed back in Syria. His sister explained, “[e]veryone who was close to Mustafa is not here no more. ... People his age were killed in a horrible way.” *Id.* at 12. His sister and mother recall multiple instances where he would tend to withdraw from the family, lock himself in his room, and not speak to anyone for days. *Id.* He would lay in his bed and obsessively consume news about the war,

social media with friends and family, and other outlets. *Id.* During these episodes he would lose weight from lack of eating. *Id.* His sister noted that these mood swings would increase in frequency, until they would happen once or twice a month. *Id.*

Dr. Guarnera writes about Mustafa's lack of mental health treatment and the likely reasons he did not seek such services. First, the Alowemers saw depression and anxiety as normal responses to what they suffered through, so they did not see it as a condition to be treated. As Shahid Alowemer told Dr. Guarnera, "[w]e honestly did not know what 'depression' and 'anxiety' were" before coming to the United States since virtually all Syrian refugees in Jordan experienced it to a certain degree. Second, addressing the trauma they experienced would only exacerbate the feelings they were desperately trying to avoid. As Mustafa's father explained: "We try not to think of those memories There is no use to think back about Syria and Jordan. ... We just dwell on the good parts and pass over the bitter parts." *Id.* at 12-13. And third, the family's own collective trauma resulted in their failure to properly address Mustafa's personal issues. Both his mother and father report that they were struggling so much with their own feelings and avoidance thereof, they lacked the capacity to help him when he was struggling more than usual. *Id.* at 13. Characteristically, Mustafa did not want to upset his parents more than necessary, and would keep his feelings inside rather than force them to confront their issues too. *Id.* This is not an uncommon dynamic in refugee families. *Id.* at 14 nn. 17-19.

At school, Mustafa's mood swings came to a crescendo on February 12, 2019. That morning, Mustafa had learned that friends and cousins had died in Syria. A teacher overheard him express a desire to kill himself. He was immediately brought to the nurse's office, where he complained of a stomachache, backache, headache, and being shaky. Daily Visit Report, Brashear High School (entry dated Feb. 12, 2019) ("Ex. H" at 1). There, he met with Kaitlin Hensgreco, a social worker at Brashear. She wrote the following in her report:

I was called to Nurse Lane's office to support. Mustafa was brought to the nurses office because had expressed suicidal thoughts. Nurse Lane had been speaking with Mustafa. I met with him in the back of the nurses office. While Nurse Lane called Resolve, I asked if he had a plan to kill himself today, he said he was having thoughts but no specific plan. I asked if he had plans hurt someone else, he said no.

Mustafa and I had a conversation about his life. He explained that he had grown up in Syria during the war. He told stories of loss and life during the war. He expressed a sense of hopelessness. He grappled with the point of high school. Mustafa expressed a desire to go back to his country to help fight the war. He explained that his parents were not supportive of him going back to Syria. He explained that he wanted to go back to help his people. He explained how it was unfair that he was safe in the US and his friends and family were dying in Syria.

Student Notes, Brashear High School (entry dated Feb. 12, 2019 at 10:26 a.m.) (Ex. H at 2). Mustafa explained further to Dr. Guarnera: "I was so depressed, to the point that I felt like, 'I'm out, I'm done with this.' ... I wanted a teacher to help me, but at the same time, I felt like I'm empty from the inside. I'm broken. ... I felt destroyed, literally." Guarnera Report at 15.

Thereafter, Mustafa drove home, and his family advised a Resolve employee that no mental health services were needed. As will be discussed in further detail

below, the FBI online covert employee made the first contact with Mustafa on March, 8, 2019, less than one month later.²

vi. Acceptance of Responsibility and Remorse

“In my heart, I know it’s wrong. It is horrible”
-Mustafa Alowemer at FBI Offices referring to his offense

On September 16, 2021, Mustafa pled guilty to Count One of the indictment. Consistent with his guilty plea, Mustafa admitted to his offense and accepted responsibility for both the harms that he caused and the punishment that is yet to come.

Mustafa’s guilty plea and acceptance of responsibility is consistent with his actions on the day of his arrest. That day, immediately after being arrested by FBI agents, Mustafa was taken to FBI offices in the southside of Pittsburgh. There, he immediately signed a *Miranda* waiver, he detailed his offense to law enforcement agents, and described what he did as “horrible.” On the day of his arrest, Mustafa told agents that, “in my heart, I know it’s wrong.”

Those that know Mustafa best have spoken to him since his arrest and attest to his genuine remorse for his actions. Mustafa’s father writes of his son’s remorse. Letter from Mousab Alowemer (Ex D. at 9) (“He talk to me every day, and he always tell me that he is very deeply sorry for what he did and want a change to go back to his normal life, study and work to help our family become happy again.”). Likewise, several of Mustafa’s close friends write to convey Mustafa’s remorse in the wake of

² A summary of the offense conduct will follow in a later section. *See infra*, Section III.B.

his arrest. Letter from Faisal Adeeb Al-Awamah (classmate/neighbor in Pittsburgh) (Ex. D. at 24) (“I spoke with Mustafa several times on the phone while he was in prison, and he was telling me how much he regretted what he had done. He has changed a lot for the better.”); Letter from Alla Al-Awamah (high school friend) (Ex. D at 27) (“I spoke with Mustafa several times over the phone, and he told me that he regretted what he did.”); Letter from Alaa Fares (lifelong friend) (Ex. D at 28) (“After the incident, I spoke with Mustafa over the phone, and he always expressed his great remorse. ... He always tells me how the incident affected his life and his family, and he regrets what he did.”); Letter from Mahmoud Fares (Ex. D at 14) (“I talk to Mustafa from time to time while he is in prison, he has changed and has become mature and aware of the mistake he committed.”); Letter from Ismael Fares (Ex. D at 5) (“Your Honor, what Mustafa did is wrong, and he acknowledge that, he told me that he was wrong and he is really hoping to come back to his family and life. He is working hard inside the jail and helping many people there, because he really wants to become a better person.”).

vii. Experience in Custody and Rehabilitation

“Being in jail for as long as I have, it is difficult to feel normal. Learning and growing as a person helps. I thank Mustafa for the time and attention he spent helping me feel normal, especially during covid when no services were available to help us grow.”

-Terrence Anthony Zeppenfeldt (prisoner at ACJ) (Ex. D at 30)

Mustafa has been in custody since his arrest on June 19, 2019. During that time he was housed in Mahoning County Prison (from June 2019 to March 2021), in Allegheny County Jail (“ACJ”) (from March 2021 to September 2022), and NEOCC

in Youngstown (from September 2022 to present). Mustafa began his experience in the local jails in this country weeks after his 21st birthday. He did so as a foreign-born, non-English speaking, Muslim man charged with a terrorism offense. He did so during the entire COVID-19 pandemic, experiencing COVID-19 symptoms at Mahoning County Prison but the jail failed to test him, and contracting the virus a second time after testing positive at ACJ on August 14, 2021. Despite the unusually harsh conditions of pretrial confinement due to his background/native language/charges, as well as the pandemic, Mustafa did his best to grow and take positive steps toward his rehabilitation.

A fellow prisoner housed with Mustafa describes him as a young man that was respected by both jail staff and prisoners alike. *See* Letter from Terrence Anthony Zeppenfeldt (Ex. D at 29-30). At ACJ, having established himself as someone who had a “great work ethic and was always reliable,” Mustafa was elevated to the position of a pod-worker. His responsibilities included passing out food trays, cleaning the pod, and working closely with the correctional officers to make “daily operations smooth.” Because of his reputation, and after COVID-19 restricted gradually abated, the jail permitted Mustafa to teach Arabic classes to his fellow prisoners. Approximately 15 men met with Mustafa twice a week learning Arabic numbers, letters, and basic vocabulary. *Id.* Mr. Zeppenfeldt credits Mustafa with “drastically” changing the “level of normalcy” in the pod. He also observed how Mustafa changed and matured while in custody, explaining how “[f]rom learning to speak better English to managing his emotions productively and positively,”

“Mustafa grew a lot as a man.” Mustafa also was known for his generosity (giving fellow prisoners his last envelope or food) and for his levelheadedness (breaking up fights as a “well-respected” voice of reason). The defense team communicated with jail staff and confirmed Mustafa’s role as a pod-worker and the class he taught.

Being in custody during the COVID-19 pandemic was especially difficult because access to outside services was severely limited, if not completely cut off. For someone in Mustafa’s position, with well-documented instances of trauma and difficulty coping with those experiences, he was forced to endure incarceration without the help that he sorely needed. Defense counsel can relate instances where Mustafa was forced to relive wartime bombing when fireworks were set off in the downtown area. In one instance, ACJ records provide a snapshot to the intense disorientation caused by his PTSD:

Responding to SCR MH sick call. Inmate has difficulty speaking and understanding English. He asks about mental health counseling that doesn’t involve taking medication. Writer inquires what he wants help with and inmate replies by describing acute trauma sx’s, such as flackbacks [sic], intrusive thoughts, nightmares, hypervigilance, related to his war experiences in Syria. Writer asks why is doesn’t want medications and he states, “I’m not better than them,” referring to his friends and family in Syria who don’t have access to medication. Writer attempts to explain the difficulty of trauma tx in an environment like ACJ. Inmate believes he will be deported to Syria, where he will be killed, and won’t have an opportunity to seek tx in the community. ... [T]he language barrier makes conversation difficult. Another challenge is that inmate reports that most of his friends have been killed and he appears to suffer from survivor’s guilt. Writer speaks with him about coping strategies for sx’s of PTSD.

ACJ Sick Call Report (June 10, 2021) (“Ex. I”). Records collected by the defense team make clear that, while incarcerated, Mustafa struggled to cope with his PTSD without any meaningful treatment while enduring life in a custodial setting during

the deadly COVID-19 pandemic. Despite this, he worked hard to better himself and be a force of positivity in a place where that can be hard to find.

b. Nature and Circumstances of the Offense

The Probation Office summarized the offense conduct in paragraphs 13 through 26 of the PSR. Mustafa acknowledges his wrongdoing and understands the seriousness of his offenses. Consistent with his admission on the day of his arrest and his guilty plea on September 16, 2021, Mustafa accepts responsibility for his conduct.

Mustafa does not make excuses for his conduct in this case. That said, undersigned counsel believe it is important to detail the specific circumstances that led up to Mustafa's initial contact with the Online Covert Employee ("OCE"), and the manner in which he became entangled in the FBI's investigation. This context is essential to understanding the nature and circumstances of the offense, rather than relying on key snippets of dialogue that fail to capture how Mustafa interacted with the undercover FBI agents in the investigation.

As detailed above, following Mustafa's arrival in the United States after years of torment as a victim and refugee of the Syrian civil war, he suffered from bouts of depression resulting from his PTSD. His family observed intermittent withdrawal from social life. His teachers observed him – on occasion – struggle with news from Syria as he learned that family and friends were killed in the conflict. That news, which streamed in endlessly on his phone, drew Mustafa into the oft-dangerous world of online communities committed to sowing discord and violence.

Dr. Stevan Weine – a licensed physician in the State of Illinois and Professor of Psychiatry at the University of Illinois at Chicago – submitted a report in connection with this sentencing memorandum detailing the extraordinarily effective ways extremist groups, like ISIS, prepare traumatized young Muslim males to make poorly informed and reckless decisions. *See* Report by Dr. Stevan Weine (“Ex. C”). Mustafa’s difficulties coping with his prolonged wartime PTSD culminated in an incident on February 12, 2019 when he learned of the death of family members and friends through his social media account. He expressed suicidal thoughts, he was taken to the school nurse’s office, and he was seen by a social worker. He told her that he was feeling hopeless and guilty for having survived when so many young people like him were dying in Syria every day. Mustafa was sent home, but he returned to school in the following days. As it so happens, FBI agents made their first contact with Mustafa by befriending him on Facebook on March 8, 2019, three-and-a-half weeks later.

After observing Mustafa’s online behavior in 2018, an online covert employee (“OCE”) befriended Mustafa on Facebook. For approximately 5 weeks, the two spoke about their lives, their disgust of Shi’a Islam and other religious groups, Mustafa’s desire to travel back to Syria, and their support of ISIS. During those nearly daily communications, on no less than three occasions, the OCE requested/suggested that Mustafa make a Bay’aa video (a pledge of allegiance to ISIS), which was portrayed

as a condition precedent to further involvement with the “brothers.”³ Ultimately, on April 12, 2019, Mustafa sent the OCE a Bay’aa video and, two hours later, the OCE sent him the contact information for a local “brother” who will provide him with a secure cell phone. On April 16, 2019, Mustafa met with an undercover employee (“UCE”) in North Park.

Mustafa met with the UCE on five occasions: April 16, April 25, June 2, June 11, and June 19, 2019. As is the case with the OCE, conversations between the UCE and Mustafa revolved around religious grievances against “apostates” (Shi’ite Muslims) and “nonbelievers” (other religions). In these conversations, the UCE often complimented Mustafa on the strength of his religious faith, his Arabic language proficiency, and his perceptiveness to gather information for a potential target. Throughout his meetings with the UCE and the CHS, Mustafa repeatedly emphasized his ignorance about this kind of activity absent help from the agents: “If you were not here, we wouldn’t be do[ing] anything.”⁴ On another occasion he said “I don’t know that much about creating bombs and stuff like this, so I’m just trying to learn.”⁵ But the agents underscored Mustafa’s information gathering abilities: “you were looking for all the right things, all the proper things.”⁶

³ Mustafa later told the UCE that he did not want to make the Bay’aa video, but ultimately decided to because the opportunity to travel to Syria arose when he was contacted by the OCE. GOVT_19219_00498.

⁴ GOVT_19219_00515.

⁵ GOVT_19219_00493.

⁶ GOVT_19219_00466.

In their first meeting on April 16, 2019 the UCE and another undercover FBI agent (a Confidential Human Source “CHS”) met with Mustafa. The agents emphasized the need to take action and not just discuss. Per the UCE, if anyone was not serious “then that Moslem needs to leave” and “there is no point for anyone to be at this table.”⁷ In response, Mustafa bragged that while was in Syria he destroyed a Minaret because it had an “unbeliever” Christian in it.⁸ From there, the agents quickly turned the conversation to the subject of each person’s “roles” in the group. The UCE said he had an engineering background and was an expert at making explosives or “cooking.” Per the UCE, he was a “lion in the kitchen.” The UCE and CHS encouraged Mustafa’s role to that of gathering information about a possible target: “we rely upon you (Mustafa) getting the information so we know it is a good target or a bad target.”

On April 25, 2019, the agents and Mustafa met for a second time. Mustafa had canvassed a mosque with Shi’ite worshippers as a possible target but decided against it because Sunni’s might be harmed. In the time between the meetings, the UCE and Mustafa frequently communicated via peer-to-peer communications such as Telegram. The two discussed their faith and what it meant to be a good Muslim. The UCE often asked Mustafa to help him with his Arabic. UCE tells Mustafa that God put him in the “disbeliever’s domain” in order to “execute [a] plan with Mustafa.” GOVT_19219_00641.

⁷ GOVT_19219_00434.

⁸ GOVT_19219_00436. There is no evidence that Mustafa’s claim about destroying a Minaret is anything but a tall tale.

By the third meeting, on June 2, 2019, Mustafa mentioned the Legacy International Worship Center as a target and that the church is attended by Nigerians.⁹ Mustafa also mentioned that the explosive should be set just after midnight, around 3:00 a.m.¹⁰ The UCE asked Mustafa if he wanted to harm the “polytheist Christians” in the church or if he just wanted to burn the building.¹¹ Mustafa replied he does not know and will have to think about it. The UCE also mentioned that some people who are inside the church or in a nearby building might die from an incendiary device that causes fire. Mustafa said he did not believe that people resided in the houses next to the church.¹²

This led to the following exchange about why Mustafa selected the Legacy International Worship Center as the target. Thus far, the government has only partially quoted this exchange in their filings. A full reproduction is below.

MA: *And the – uh, this house is still for the ones who go to church because they are Nigerians. [UI]*

UCE: *Yeah. So, why the Nigerians? All of them are polytheists.*

MA: *They are all polytheists. We, we, take revenge for our brothers in Nigeria.*

UCE: *There is an Islamic State or there was an Islamic State in Nigeria.*

MA: *Of course there is [UI]*

UCE: *Boko Haram?*

MA: *Boko Haram. It doesn't – it did not pledge fealty brother.*

UCE: *Of course it did.*

MA: *Not always.*

UCE: *OK.*

MA: *I am not sure about this. And uh, I will Inshallah – they all uh. They all were pious. But thank God [UI] Abu Walid Al Filastini is the leader|of ISIS and God willing he will start doing things to the French*

⁹ GOVT_19219_00472.

¹⁰ GOVT_19219_00480.

¹¹ GOVT_19219_00481.

¹² GOVT_19219_00482.

A reproduction of the full exchange shows the context in which Mustafa speaks about the Legacy International Worship Center. Mustafa's reasoning for why that target is selected is in direct response to the UCE questioning him. Mustafa's *first response* is that "they are all polytheists." Only after stammering, does Mustafa secondarily present the "revenge of the brothers in Nigeria" rationale. But only a few lines later Mustafa admits he is unsure of what is happening in Nigeria and how it relates to ISIS. But even if he is unsure, it does not matter because he perceives Boko Harm as being suitably "pious." This full context of the conversation shows Mustafa's 1) uncertainty as to exactly why he chose the target; 2) his overall ignorance of geopolitics and whether one group is affiliated with another; 3) how he views whether a group is praiseworthy and deserving of his support depends on how religiously "pious" it is.

During the fourth meeting on June 11, more detailed plans were made about the plot. Mustafa discussed fasting during Ramadan and other religious grievances about Shi'a Muslims, as well as other countries where Muslims are persecuted. Mustafa, the UCE, and the CHS drive to the site of the church and discuss the plan in greater detail, including how to avoid detection from law enforcement. Significantly, during this meeting, Mustafa determined that the goal is to only destroy the church, and elected to only use one explosive device instead of two and also decided that announcing this was done by ISIS is not necessary, instead proposing to "stay quiet."¹³

¹³ GOVT_19219_00538.

At the last meeting, on June 19, he and the UCE discussed a cleric in Chicago that may be sympathetic to ISIS. Mustafa confirmed, again, that he only wanted to use one explosive device. He is arrested shortly thereafter.

c. Sentencing Guidelines

The Probation Office calculates Mustafa's total offense score at 37 points, and places him in Criminal History Category of VI, which results in an advisory Guideline range of 360 months to life. Since the statutory penalty authorized by Congress is 0 to 20 years, however, the advisory Guideline range applicable in this case is 240 months. U.S.S.G. § 5G1.1(a). The Probation Office's calculation, however, is significantly inflated because of its application of the "Terrorism" enhancement pursuant to Section 3A1.4, which adds 12 points to Mustafa's offense score and moves him from Criminal History Category I to VI, despite him having no prior criminal history. For reasons argued in Mustafa's position with respect to sentencing factors, and his forthcoming reply to the government's response, that enhancement does not apply in this case. ECF No. 127. Defense counsel intends to set forth additional facts and argument at the time of sentencing on that issue.

Absent the Section 3A1.4 enhancement, Mustafa's total offense score should be calculated as follows:

- Base offense level (§ 2M5.3(a)): 26
- Provision of support/resources for violent act (§ 2M5.3(b)(1)): +2
- Hate crime (§ 3A1.1 – victim based on religion): +3
- Acceptance of responsibility (§ 3E1.1): -3

- Total Offense Score: 28

With no criminal history, Mustafa has zero criminal history points and he falls in Criminal History Category I. Accordingly, his advisory Guideline range is 78 to 97 months.

IV. MR. ALOWEMER SHOULD RECEIVE A DOWNWARD DEPARTURE AND/OR VARIANCE BECAUSE OF HIS MENTAL AND EMOTIONAL CONDITION AT THE TIME OF THE OFFENSE AND HIS DIMINISHED CAPACITY

The Court may depart below the advisory Guideline range if it finds that the defendant’s “mental and emotional conditions[,] ... individually or in combination with other offender characteristics, are present to an unusual degree and distinguish the case from the typical cases covered by the guidelines.” U.S.S.G. § 5H1.3. Courts around the country have also varied below the advisory Guideline range where the defendant suffered from a mental or emotional condition as a result of their PTSD. *See, e.g., United States v. Taylor*, 736 Fed. App’x 216, 222 (11th Cir. 2018) (variance for defendant’s PTSD was not an abuse of discretion). Courts have granted significant variances even when the offense of conviction is violent in nature. *See, e.g., Hicks v. United States*, 2017 WL 412644, at *5 (D.N.H. 2017) (noting “the court expressly found that Hick’s PTSD warranted a downward variance” in a bank robbery case); *United States v. Oliver*, 2022 WL 2188967, at *4 (M.D. Ala. 2022) (granting downward variance to jail guard who beat handcuffed prisoners because the defendant’s PTSD made him “no less deserving of leniency”). Inherent in these decisions is that, at the time of the offense, the defendant suffered from a mental health and emotional condition to the extent that it impaired their

reasoning and therefore mitigated their culpability for their conduct. It also attributes a defendant's conduct to a mental health condition that can be treated, thus reducing the likelihood of recidivism and danger to the community. That same basis for a downward departure and/or variance applies in spades to this case.

As a result of his experience in the Syrian civil war, and the subsequent four years of as a refugee in Jordan, Mustafa suffered from PTSD. As Dr. Guarnera explains in her report, the combination of prolonged (i.e., chronic) threat and deprivation can lead to the “greatest degree of neural changes and associated deficits,” especially when those occur during an individual's youth. Guarnera Report at 31. After evaluating Mustafa and reviewing relevant records, she concludes that he “experienced an extreme, chronic history of war and forced resettlement during adolescence that is remarkable for being extremely high on both dimensions: threat *and* deprivation.” *Id.* Even after he arrived in the United States, the exposure to crime in Northview Heights, his alienation from fellow students at Brashear, and the constant stream of news of Syria on his phone worked to retrigger the trauma he experienced only a couple of years prior. As a result of that prolonged exposure to threat and deprivation, Dr. Guarnera concludes that Mustafa suffers from PTSD, complex PTSD, and major depressive disorder. Ultimately, Dr. Guarnera concludes:

In summary, the research on neurobiological development demonstrates predictable changes in brain structure and functioning as a result of early threat and deprivation. Given Mr. Alowemer's extensive threat and deprivation experiences during the Syrian Civil War, these cognitive and behavioral changes are crucial to understanding the offense conduct. Trauma-related cognitive impairments—including executive dysfunction, emotional dysregulation, hyperarousal to threat, and increased suggestibility

and compliance (particularly to authority figures or in social situations)—all appear to have made him more vulnerable to engaging in the offense conduct.

Id. at 45.

Through contemporaneous records and interviews with Mustafa, his family, and close friends, his struggles with PTSD and depression are well documented. His family observed signs of depression and withdrawal in Jordan. Upon entry into the United States – after finally escaping the hellish experience of being a refugee child laborer in Jordan for four years – he reported to the evaluator that he was “[f]eeling down, depressed or hopeless (several days).” Teachers at Brashear remarked how he was often tied to his cell phone consuming news and communications from Syria that often led to bouts of depression and mood changes. His sister reports that over time he would more frequently lock himself in his room, distancing himself from his close-knit family, obsessively searching the internet for news about the conflict in Syria. And finally, on February 12, 2019, Brashear employees documented an event shortly after Mustafa learned of the death of close relatives and family friends, after which he expressed suicidal thoughts and was sent home to be with his family. Less than one month after that incident – on March 8, 2019 – an undercover FBI agent made first contact with Mustafa by requesting to be his friend on Facebook. Mustafa’s worsening mental health and emotional condition was peaking at the time a preconceived outlet for his discontent was presented to him. Through these records and accounts, it is clear that his PTSD and depression – relating from his experience in the Syrian civil war and subsequent status as a refugee in Jordan – substantially contributed to his conduct in this case.

Dr. Guarnera exhaustively details how his mental health diagnoses contributed to his behavior. First, after detailing how trauma and depression affect a young person's executive function and emotional regulation, she observes that "it is not surprising that Mr. Alowemer began making risky, ill-advised decisions to converse and meet with individuals allegedly involved in terrorist activities only *after* [the February 12, 2019] acute emotional crisis." Guarnera Report at 36. Dr. Guarnera acknowledges that even if he previously held "inclinations sympathetic to their viewpoint," his inability to properly "weigh[] competing values, plan[], control[] emotions, and consider[] future consequences" was likely a contributing factor to his offense conduct.

Second, Mustafa's chronic exposure to threatening experiences during his teenage years led to his hyperarousal to threats inherent in working with individuals holding themselves out to be members of an international terrorist organization, and to the police force to whom he could turn if he wanted to turn himself in. While his conduct – at times – demonstrates an individual willingly participating in the plot, his reported fear of the undercover agents and the police are both intuitive and sufficiently supported by research. As Dr. Guarnera concludes, "[t]his kind of chronic emotional arousal would have further degraded Mr. Alowemer's ability to engage in complex cognitive tasks necessary to come up with a plan to extricate himself from what he perceived to be a dangerous situation." *Id.* at 39.

Third, Mustafa's trauma experiences are associated with both suggestibility (to take on another person's views as your own) and compliance (to acquiesce to requests or demands).¹⁴ Dr. Guarnera acknowledges that Mustafa did, at times, take initiative in his dealings with the undercover agents, but she also cites to numerous instances when the agents asserted themselves in ways that clearly directed Mustafa toward increasingly serious conduct. *Id.* at 40-43. For example, the electronic communications and transcripts produced by the government demonstrate that undercover agents pushed Mustafa beyond his initial intention to merely "work with them in the fields of information dissemination and electronics," and instead go beyond the "keyboard courage" to something more substantial like "cooking" (i.e., making explosives). *Id.* at 40-41. In another instance, the FBI agents repeatedly inquired whether they should raise the stakes of the plot to also harming people rather than merely destroying the church building in the middle of the night when no one would be inside (as Mustafa initially suggested). After those suggestions, Mustafa acquiesced and suggested a second explosive device during the daytime.¹⁵ *Id.* at 42-43. These examples, Dr. Guarnera concludes, indicate that Mustafa "went beyond his own inclinations because he was responding to cues from the FBI employees." *Id.* at 40.

¹⁴ As an example, Dr. Gaunera cites research demonstrating that youth with greater trauma exposure are more likely to falsely confess in real-world interrogations. *Id.* at 39 & n. 71.

¹⁵ Mustafa ends up deciding against a second device during the day in that same meeting. *Id.* at 43 & n. 92 ("We want to destroy and burn, I think that just one bag is enough. ... I think just one for now.").

Fourth, Mustafa's youth and history of trauma made him more likely to respond with deference to someone perceived to be an authoritative figure. *Id.* at 43 (“As trauma-exposed individuals are already prone to compliance, adolescents with trauma exposure are particularly vulnerable to compliance with those they consider to be an authority.”). Throughout his communications with undercover agents, Mustafa refers to himself as their younger brother willing to do as they direct him. For example, the FBI summarized texts Mustafa sent in mid-May 2019 to the UCE, who was in his 30s, was married, and even brought a woman purporting to be his wife to the first meeting: “MA says that he is going to follow UCE’s advice, because UCE is older than MA and MA considers UCE as his older brother.”¹⁶ In another instance, in his first meeting with the UCE after the UCE established he was the explosives expert, when discussing electronic security measures, Mustafa says: “I will do anything you tell me currently because truthfully I don’t know anything.”¹⁷ In perhaps the most stark example, during the third in-person meeting, Mustafa tells the UCE: “If you were not here, we wouldn’t be do[ing] anything. ... Because I don’t know nothing, like literally nothing about this”¹⁸ These professions of deference were not exclusive to the UCE. Mustafa also made similar statements to the OCE (the individual that introduced Mustafa to the UCE) on April 28, 2019: “And you too my brother, if you need anything, don’t hesitate Allah willing, I’m your

¹⁶ GOVT_19219_000669.

¹⁷ GOVT_19219_000430.

¹⁸ GOVT_19219_000515.

little brother with Allah’s permission.”¹⁹ Dr. Guarnera concludes that given his trauma history and age at the time of the offense, Mustafa was “neurodevelopmentally primed to comply with individuals he viewed as authority figures, aside from any potential fear motivation.” Guarnera Report at 44.

And finally, Mustafa’s age and his increased suggestibility and compliance due to his trauma made him more likely to engage in risky behavior when given a peer group in which to act out. Dr. Guarnera observes that “it is not surprising that Mr. Alowemer apparently engaged in no illegal activity when he was alone, and only began to show some mobilization when he was part of a group of three men (along with the UCE and CHS).” *Id.* In that context, Dr. Guarnera notes that “[t]rauma-related deficits in executive functioning would make it even more difficult to inhibit these typical adolescent impulses.” *Id.* at 45.

Ultimately, Dr. Guarnera concludes that Mustafa is a “quite low” risk for reoffending. Specifically, she finds he is “highly unlikely to use the internet to seek out ISIS-sympathetic individuals to which he has no connection in real life, in order to plan a terrorist attack on U.S. soil.” *Id.* at 55. She concludes that because of his reduced mobilization potential, exposure to trauma treatment, and his inevitable aging out of his previously high-risk group, he presents a low risk for reoffending.

Dr. Guarnera’s extremely thorough evaluation of Mustafa and her subsequent report credibly concludes Mr. Alowemer’s mental and emotional condition at the time of the offense contributed significantly to his offense conduct.

¹⁹ GOVT_19219_000390.

That mitigates his culpability for his offense. Furthermore, with proper supervision conditions and treatment, he is a low risk to reoffend. That reduces the concern for recidivism or danger to the community. Accordingly, a significant variance below the advisory Guideline range is warranted.

V. MUSTAFA SHOULD RECEIVE A DOWNWARD VARIANCE BECAUSE HE IS FACING DEPORTATION FOLLOWING HIS SENTENCE

Mustafa will be deported. Having been convicted of an offense that constitutes “terrorist activity,” *see* 8 U.S.C. §§ 1182(a)(3)(B)(iii)(V) and (VI), he is subject to deportation. 8 U.S.C. § 1227(a)(4)(B). As a result of that deportation, he will be separated from his family, he will not be permitted to return to the United States, he will be marked with the stigma of having been deported from the United States, and he will be deprived of valuable services and opportunities in whichever country he is sent to. Needless to say, his deportation is a collateral consequence of his conviction and sentence and will represent additional punishment above and beyond that which is contemplated by the Guidelines. Accordingly, a substantial variance is warranted.

For Mustafa, deportation is an immensely difficult result, emotionally and practically. While serving an incarceration sentence in the Bureau of Prisons represents a hardship contemplated by the Guidelines, if Mustafa is deported, he faces the prospect of an even worse future. He has not lived in Syria or Jordan since he was a teenager and his family fled the violence of the civil war. While the future status of that conflict is unknown, it is likely that Mustafa will face immense

danger as a former United States refugee (with family in the United States) who stands convicted of assisting ISIS.

This Court should take this into account when formulating a just sentence. The Third Circuit has recognized that a defendant's deportability status may be taken into account under Section 3553(a) and warrant a downward variance. *United States v. Jimenez*, 328 Fed. Appx. 802, 804 (3d Cir. 2009). Other circuits have found similarly. In *United States v. Thavaraja*, 740 F.3d 253, 262-63 (2d Cir. 2014), the defendant was convicted of conspiracy to provide material support to a foreign terrorist organization and conspiracy to bribe public officials. He faced a guidelines sentence of 240 months, but the district court imposed a below-Guidelines sentence of 108 months in part because the defendant faced likely deportation upon the completion of his sentence. *Id.* at 256. Rejecting the government's argument that immigration consequences of a conviction should not be considered by a sentencing judge, the court explained that "[i]n determining what sentence is 'sufficient, but not greater than necessary,' to serve the needs of justice, a district court may take into account the uncertainties presented by the prospect of removal proceedings and the impact deportation will have on the defendant and his family." *Id.* at 262-63. Other courts have also found that a defendant's deportability warrants a downward variance because the need to protect the public from future crimes is diminished under Section 3553(a)(2)(C). *United States v. Morales-Uribe*, 470 F.3d 1282, 1287 (8th Cir. 2006); *United States v. Ramirez-Ramirez*, 365 F. Supp. 2d 728, 732-33 (E.D. Va. April 18, 2005).

Mustafa's alienage affects him adversely in other ways, as it relates to how he serves his incarceration time. First, the pendency of the ICE detainer and the looming specter of removal proceedings may result in significant time in immigration custody subsequent to the prison term this Court may impose. In other words, upon the conclusion of any sentence this Court imposes, Mustafa will immediately be sent to an ICE facility to be held until the conclusion of his removal proceedings. Therefore, Mustafa will not "get out" at the conclusion of this Court's sentence, he will continue to be held, just by a different agency.

Second, his lack of status deprives him of the opportunity for early release to a residential re-entry center (which results in more time actually served in jail or prison). Third, as a noncitizen, he is likely ineligible for much of the programming that BOP offers, including for rehabilitative purposes, one of the key goals of criminal sentencing. *See Jacob Schuman, Federal Prisons Don't Even Try to Rehabilitate the Undocumented*, The Marshall Project (Oct. 17, 2017) (summarizing programs from which aliens are excluded and noting that "[d]espite BOP's rehabilitative promises, the agency excludes [undocumented] prisoners from its best . . . vocational programs.).²⁰ And lastly, Mustafa security designation score may increase due to his ICE detainer, likely resulting in him being designated to a higher-security facility with greater restrictions on movement throughout his sentence. *See generally* BOP Program Statement 5100.08 (2006) at ch. 4 pg. 11-12,

²⁰ Available at <https://www.themarshallproject.org/2017/10/17/federal-prisons-don-t-even-try-to-rehabilitate-the-undocumented> (last visited October 8, 2022).

available at https://www.bop.gov/policy/progstat/5100_008.pdf (indicating that an ICE detainer can increase a prisoner's security level on a case-by-case basis).

In sum, the Court should grant a substantial variance below the advisory Guideline range based on Mustafa eventual removal proceedings, the future danger that deportation would present, and the effect of his alien status on his time while incarcerated.

VI. MR. ALLOWEMER SHOULD RECEIVE A DOWNWARD VARIANCE BECAUSE OF THE SYSTEMIC MANIPULATION AND RADICALIZATION OF YOUNG PEOPLE PERPETRATED IN THE MIDDLE EAST AND ON SOCIAL MEDIA

Environmental factors in a defendant's life that socialized them toward criminal behavior are often considered by courts in assessing an appropriate sentence. *See, e.g., United States v. Bannister*, 786 F. Supp. 2d 617 (E.D.N.Y. 2011). For that reason, it is common for courts to cite to a defendant's upbringing, exposure to drugs and violence as a child, or the effects of poverty and hunger that affected their development. While such factors do not excuse a defendant from the crimes they commit, the exposure to such environmental elements explains how they came to make the decision to engage in a criminal lifestyle. That analysis mitigates their culpability because their perceived range of choices – law abiding versus non-law abiding decisions – were more limited than the average person. The environmental factors present in Mustafa's life leading up to his offense mitigates his culpability in this case.

Dr. Weine's report details the advanced and effective means by which groups like ISIS lure, influence, and recruit individuals around the world through social

media.²¹ He details how ISIS intentionally targets individuals most susceptible to radicalization; namely “males under 25, in non-Muslim Western countries, who feel isolated, rejected and/or humiliated due to the adversity they have experienced in their lives.” *Weine Report* at 3. Those individuals commonly turn to online forums and social media “in search of answers and become part of a virtual community or ecological niche.” *Id.* That online environment is “designed [by ISIS] to engage them, normalize them to extremism and violence, and motivate them to support and conduct violent acts which promote the ISIS cause.” *Id.* at 4. ISIS uses social media sites such as Facebook, Instagram, Skype, and YouTube to “develop an interpersonal dialogue” with people like Mustafa and to “substantiate” its beliefs and goals. Indeed, FBI Director Comey, in his July 2015 testimony before the United States Senate stated that “[s]ocial media has allowed groups, such as ISIL, to use the Internet to spot and assess potential recruits [and they therefore] now ha[ve] direct access into the United States like never before.” *Id.*

Much in the same way that a child who observes drug use and gun violence every day while growing up in an impoverished neighborhood, disaffected young people searching for meaning online and exposed to ISIS’s perverted content will become socialized to accept such extreme behavior. Dr. *Weine* reviewed Mustafa’s online conduct *before* FBI agents contacted him and concluded his posts and “likes”

²¹ The practice of using online content to radicalize individuals is not limited to extremist Muslim groups like ISIS. As Dr. *Weine* notes, “[t]hese same approaches are used not only by ISIS but also by white supremacist recruiters” here in the United States. *Id.* at 7.

were consistent with this phenomenon. As Dr. Weine notes, Mustafa was “young, traumatized, depressed, and suicidal” while harboring guilt for having left Syria. *Id.* at 6. Mustafa “wanted to do something significant to help Syrians and other Muslims.” In light of his age and trauma history, Mustafa “approached, rather than retreated, from potential threats or dangers presented by ISIS” *Id.* Ultimately, Dr. Weine finds that ISIS content and recruitment online – especially for someone desperately searching for news content on the Syrian conflict – “at least explains his actions in the context of a larger phenomenon that has been extraordinarily effective at preying on adolescents like Mr. Alowemer who have experienced extreme trauma.” *Id.* at 7.

In light of Mustafa’ background and the online environment he was drawn to in search for news about Syria and meaning about his role in that conflict, he was socialized to accept the extreme fundamentalist views espoused by ISIS. Although that does not excuse his offense, in any way, it does shed light on how this happened and it mitigates his culpability in this case. For that reason, a further downward variance is warranted.

VII. MR. ALOWEMER SHOULD RECEIVE A DOWNWARD VARIANCE BECAUSE OF THE UNUSUALLY HARSH CONDITIONS OF HIS PRETRIAL CONFINEMENT

As stated above, Mustafa has been in custody for nearly 41 months. The majority of his custody was during the COVID-19 pandemic. Although we know that all local jails severely restricted movement and access to programming for prisoners during the pandemic in order to stem the spread of the virus within their walls,

there are extensive public records showing that was the case at ACJ, where Mustafa spent a majority of his time in custody.

First, inmates were unable to receive visitors. Allegheny County Jail, *COVID-19 Information, Our Response*, available at <https://www.alleghenycounty.us/jail/index.aspx>. In fact, in-person visitation for inmates was suspended for multiple years after a consent decree was entered into between ACJ and litigants in a class action lawsuit filed in this District. Consent Order, *Graham, et al. v Allegheny County, et al.*, Case No. 20-cv-496 (Dkt. No. 71) (May 27, 2020). In particular, the Consent Order attaches an agreed upon Continuing of Operations Plan (“COP”) which details how ACJ will handle operations during the COVID-19 pandemic.

Second, inmate programming was indefinitely suspended or drastically curtailed. According to the COP, ACJ suspended all “non-essential services in the facility” in order to “restrict the number of individuals entering/exiting the facility. COP at 13. This means no men’s group, no group therapy sessions, no congregating to discuss and relate difficult traumas and barriers to opportunity with others with similar life backgrounds. While it is understandable that such services be altered in the midst of a deadly pandemic, the lack of such support groups undoubtedly affects the nature of the inmate’s time in custody in a negative manner. While those restrictions gradually eased over time, Mustafa acutely experience the lack of programming due to his mental health conditions. *See* discussion, *supra*, Section III.a.vii.

Third, inmate recreational time was severely limited. In order to comply with health officials' recommendation to reduce groups of greater than 10 individuals from congregating, ACJ determined that "a reduced number of inmates will be permitted out of their cell (not to exceed 10)." *Id.* at 17-18. The practical effect of this regulation is that inmates were relegated to a maximum of one hour a day out of their cell – commonly referred to as 23 and 1 – for long periods of time. Anecdotally, undersigned counsel can report this protocol has not only reduced the time an ACJ inmate can exercise, interact socially with other inmates, or just get out of their cell, but it also has reduced the amount of time they can make phone calls to family and friends. Furthermore, there have been numerous incidents where the jail decided an inmate quarantine is necessary in order to prevent an outbreak.

Fourth, mental health therapeutic programming remained limited for long periods of time. Transcript, Jail Oversight Board at 4 (July 2, 2020), *available at* <https://alleghenycontroller.com/boards-meeting-minutes/>.

Put together, Mustafa's presentence custody in this case has been far more harsh than what is typical for a defendant in this District. He has been kept from seeing his family, he has had little to no access to inmate programming, his recreational time has been drastically curtailed, his access to phones likewise has been limited, and the jail has struggled to provide regular mental health treatment to its inmates since the pandemic began. Custody is a restriction of liberty in order to achieve the four pillars of our criminal justice system (retribution, deterrence,

incapacitation, and rehabilitation). But when that term of custody is more onerous and restrictive than what is typically experienced by the average prisoner, that punishment is incrementally harder to bear. *See United States v. Sutton*, 973 F Supp. 488, 493 (D.N.J. 1997), *aff'd* 156 F.3d 1226 (3d Cir. 1998) (“Unusual pretrial confinement ... in either length or severity of condition, can properly be considered by the sentencing court.”). Accordingly, the Court should recognize the harsh conditions in which Mustafa has been confined during the 3.5 years and grant a variance from the advisory Guideline range.

VIII. MUSTAFA SHOULD BE SENTENCED TO A TERM OF INCARCERATION WITHIN THE NON-3A1.4 GUIDELINE RANGE BECAUSE SUCH A PUNISHMENT WOULD BE COMPARABLE TO SENTENCES RECEIVED BY OTHER INDIVIDUALS ENGAGED IN SIMILAR CONDUCT

Section 3553(a)(6) directs district court judges to be mindful of “the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct.” There is no precedent in this District in terms of comparable cases for determining the relative seriousness of the conduct in Mustafa’s case. There are, however, comparison cases from other districts that are instructive and share some aspects with this case.

In *United States v. Wright et al*, 1:12-cr-0238 (N.D. Ohio) the defendants conspired to attack financial institutions, bridges, and police in the Cleveland area, hoping to explicitly link the attacks to frustration over economic inequality in the United States. *See United States v. Stafford*, 782 F.3d 786 (6th Cir. 2015) (upholding *Wright* on appeal). They were charged with § 2332 (attempted use of a

weapon of mass destruction, which carries a 25-year maximum penalty). The defendants purchased what they believed to be explosives from an informant and placed those fake explosives at the base of a bridge outside of Cleveland. The defendants attempted to blow up the bridge with a cell phone detonator. One defendant was convicted after trial and the remaining four defendants pled guilty. The defendant who pled guilty received 10 years, while the remaining defendants received 11.5 years, 9.75 years, 8 years, and 6.75 years with an average sentence of 9.25 years.

In *United States v. Khan*, 1:14-cr-564 (N.D. Ill. 2016), a former national guardsman gave money to ISIS officials while he was traveling in Africa. He also purchased a handgun, traveled overseas with the intent of making contact with an ISIS member, and purchased an assault rifle as part of a plot to kill United States servicemembers. His internet search history included terms such as “Orlando Shooting Weapon” and “.23 not lethal enough for civilians.” The defendant pled guilty to § 2339b and was sentenced to 132 months.

In *United States v. Farrokh*, 1:16-cr-20 (E.D. Va. 2016), Farrokh was arrested in the Richmond Airport before he could board a plane to travel to Syria to join ISIS. Similar to Mustafa, Farrokh swore an oath of allegiance and stated he wanted to kill and be killed for Allah. Significantly, Farrokh went further by agreeing to travel the country and kill Americans. At sentencing, the district court granted a significant downward departure under § 4A1.3(b) because the Guidelines significantly overstated the defendant’s criminal history, and a significant

downward variance under § 3553(a). His guideline range was 292-365 months but ultimately he received a sentence of 102 months.

In *United States v. Thavaraja*, 740 F.3d 253 (2d Cir. 2014), the defendant, a Sri Lankan native, was the principal procurement officer for the Tamil Tigers foreign terrorist organization. He was detained in Indonesia in 2007 and extradited. He pled guilty to § 2339b and his guideline sentence was 240 months. Despite this, the district court sentenced him to 108 months incarceration. At the time of his arrest Tharvaraja was 33 years old and been engaged in a prolonged pattern of terrorist activity as the chief procurement officer. His “function [in securing arms for the Tamil Tigers] was critical and involved . . . the procurement of deadly merchandise almost inevitably used to injure, murder, main, not only military but also civilians.” 740 F.3d at 258. As such, he was far more morally and criminally culpable than Mustafa in this case. Despite this, the court found a substantial downward variance was appropriate because he had no prior criminal record and he taught and worked with other inmates in pretrial detention. *Id.* at 260. Mustafa has similarly used his time in pretrial detention for the betterment of himself and others.

In *United States v. Conley*, 14-cr-163 (D. Co. 2014), the defendant pled guilty to one count of conspiracy where the predicate statute was § 2339b material support to Al-Qaeda and ISIS. According to the plea agreement, Ms. Conley met an active ISIS member and soon after joined the United States Army Explorers to receive military training in tactics and firearms for the purpose of helping ISIS. She

traveled from Colorado to Texas to attend the training. One year later, she was apprehended before she could get on a plane to Turkey where she planned to make her way to Syria to fight with ISIS. When she was arrested, Conley was in possession of numerous items demonstrating proficiency and certifications of a number of specialized skills, including first aid/nursing certification, U.S.A.E., and NRA gun certifications. She also had numerous books from ISIS leaders. She received 60 months imprisonment.

In *United States v. Wolfe*, 14-cr-213 (W.D. Tex. 2014), Wolfe pled guilty to one count of § 2339b arising from his extensive efforts to go to Syria and join ISIS, including obtaining special certifications for he, his wife, and child to travel, raising money to finance travel to Syria, and creating a ruse to disguise the actual nature of his trip. *United States v. Wolfe*, 1:14-cr-213, Criminal Complaint, at 2-11. During the planning of the trip, the 24-year-old Mr. Wolfe showed he intended to bring his wife and two young children with him to join ISIS. He pled guilty and received a sentence of 82 months.

In *United States v. Warsame*, 651 F. Supp. 2d 978 (D. Minn. 2009), the defendant pled guilty to one count of conspiracy to provide material support to ISIS based on conduct that he traveled to Afghanistan and trained with Al-Qaeda, met and attended lectures by Osama Bin Laden, and continued to keep in contact with Al-Qaeda members. Because he had no other criminal history, the court granted a significant downward variance. He received 92 months of imprisonment.

While the above cases share some similarities with Mr. Alowemer's case, these are not the only cases in which a conviction for § 2339b resulted in a sentence comparable to the request in this case. *See e.g., United States v. Daniels*, No. 2:16-cr-222 (N.D. OH 2016) (80 months); *United States v. Ludke*, 16-cr-175 (E.D. Wis 2106) (66 months); *United States v. Brown*, 14-cr-58 (E.D. NC 2014) (92 months and 102 months).

Accordingly, in light of other similar cases, a sentence within the non-3A1.4 advisory Guideline range is appropriate in this case.

IX. CONCLUSION

In light of the above, a sentence between 78 and 97 months is sufficient but not greater than necessary to achieve the purposes of sentencing.

Respectfully submitted,

/s/ Andrew Lipson

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October 25, 2022

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RE: *United States v. Mustafa Alowemer*
Magistrate no: 19-1380
DOB: [REDACTED]

Dear Mr. Lipson:

I composed this report in response to your request for an expert review and summary of the living situation of Syrians in Dara'a during the beginning of Syria's civil war and life for Syrian refugees in Jordan during the years 2012–2016. I base the content of this report primarily on my academic research on Syrian refugees in Jordan and Lebanon from 2013-2016. The report is also informed by my experiences working for humanitarian organizations that were involved in the response to the Syrian refugee crisis. Last, the report is informed by my personal knowledge of Syria and the surrounding countries from living in Syria before the war, and living in Lebanon for much of the 2013-2016 period, including multiple extended work trips to Jordan.

This report provides an overview of the living conditions for Syrians in southern Syria during the early days of the war and for Syrian refugees in Jordan from 2012–2016. The report summarizes the beginnings of Syria's revolutionary uprising in 2011, followed by the government's brutal crackdown and the country's descent into a devastating civil war. As a result of the civil war, Syrian cities, towns, and infrastructure suffered a tremendous amount of damage, much due to a campaign of sieges and aerial bombardment carried out by Syrian government forces and government-allied Russian forces. As a result of the wartime violence and its consequences, more than half of the country's prewar population was forced from their homes. In addition to some eight million people displaced internally in Syria, four million Syrians fled their country, thereby facing the challenges of life as refugees.

The report then focuses on developments in Dara'a from 2011 to 2014. Dara'a was a critical early mover in the peaceful uprising against the Assad regime, and as a result was also the first Syrian city to suffer a punishing siege by the national army, causing significant physical destruction and many civilian deaths. The report then discusses the spread and development of rebel groups in the Dara'a region..

In the next section, the report presents a discussion of what life was like for Syrian refugees in Jordan. Drawing on a series of focus groups with Syrian refugees in Jordan from 2016, I present Syrians' first-hand accounts of life in Jordan as refugees. Many Syrians who arrived at the

Jordanian border without their identification documents were sent to a large camp contained by razor wire in the Jordanian desert – Za’atari camp. As I discuss below, Syrians faced strict limits of their ability to leave the camp, and getting a permanent pass to leave was challenging, which led to Syrians finding ways to be smuggled out of the camps.

Overall, about 75% of Syrians in Jordan lived outside of camps in 2016, living largely in urban peripheries. The report then aims to contrast the living conditions for Syrians in and outside of camps, and then goes into detail about how Syrians in Jordan find work, access humanitarian aid and healthcare, and send children to school. Material hardship was a widespread reality for Syrian refugees living in Jordan in the study period. Most Syrians could not work legally in the country. For essential items like food, drinking water, and clothing, a large number of Syrian refugees in Jordan received some form of humanitarian assistance from the UN. The UNHCR also subsidized certain healthcare services for Syrian refugees. Yet even with these important forms of material support, the burden of poverty was still extremely challenging for many, if not most, Syrian refugees in Jordan.

Author background

Between September 2013 and October 2016, while enrolled as a PhD student in political science at Yale University, I spent 30 months living in Beirut for the purposes of Arabic study and PhD research. In the years that followed I conducted a wide range of qualitative and quantitative research on Syrian refugees’ lives and communities in Lebanon. In this research I conducted numerous interviews with Syrian refugees about their lives and conducted 15 months of participant observation in a Syrian NGO and a refugee camp. In addition to this qualitative research, I have worked with International Rescue Committee (IRC), the UN Refugee Agency (UNHCR), and the World Bank in running studies around Syrian refugees’ living situations and the effectiveness of humanitarian responses. My work with IRC and UNHCR focused on Lebanon. My work with the World Bank took place in Jordan as well as Lebanon and Iraq. During my work for the World Bank report I made multiple trips to Jordan. Together, these experiences formed the content of my PhD dissertation, which I submitted in March 2018, and for which I received my PhD with distinction in May 2018. In the two years that followed I worked as a postdoctoral fellow at the Immigration Policy Lab at Stanford University on a large-scale research project on Syrian refugees’ migration choices. In July 2020, I started a position as an assistant professor at the University of California, Santa Barbara, where I have continued my research on refugee livelihoods, community dynamics, and migration choices.

Report methodology

All content is informed by my three years of research in the Syrian refugee crisis while living in Lebanon, including research trips to Jordan. Because I did not conduct research in Syria due to the war, I conducted a review of media, books, and academic research on Syria’s war to write a background section for life in southern Syria. Lastly, I draw on my own research in Jordan to characterize the conditions for Syrian refugees living in Jordan. Both quantitative and qualitative data from a World Bank research project to which I was a contributor is also referenced. The qualitative data draws on structured interviews with community leaders and 56 focus-group discussions with Syrians in Lebanon and Jordan. Quantitative data is based on a representative

sample of the Azraq and Za'atari camps (which account for the vast majority of Syrian refugees in camps in Jordan). Survey data also included purposive sampling of Syrian and Jordanian respondents from other areas. In the surrounding Jordanian governorates, Mafraq and Zarqa, the survey sampled areas physically proximate to the camps and other areas with a high number of Syrian refugees. The research also included respondents in the Amman governorate, based on a sampling strategy that aimed to achieve geographic diversity while focusing survey efforts in areas with a high prevalence of Syrian refugees. Statistics drawn from this survey are referenced to the World Bank study.¹ Quotations from the interviews with community leaders are formatted in green text.

Dara'a and the Syrian Civil War

What began in Syria in 2011 with street demonstrations and calls for political reforms deteriorated into a government crackdown and subsequent civil war. Estimates of the death toll in Syria's war vary but many organizations put the figure well over 500,000, in addition to an even larger number of people wounded and permanently handicapped. Large sections of the country's cities are now in ruins, destroyed by government bombardment. Basic functions of a peacetime country and government have collapsed, including the provision of public services such as water, electricity, and schools, and economic policy to sustain functioning markets for goods and services. The civil war led to an enormous refugee crisis. Millions of people have fled to Lebanon, Jordan, Turkey, Iraq, Egypt and beyond. Using UN registration numbers, which provide a conservative estimate of displacement, four million Syrians have fled to neighboring countries and eight million are displaced inside Syria. In total, this means that more than half of Syria's pre-war population of 23 million people has been displaced by this conflict. This is one of the largest refugee crises in the 20th century both in terms of absolute number and as a share of the country's population. For reference, the Iraqi refugee crisis, at its peak around 2008, displaced roughly four million Iraqis from their homes, including some 2.2 million inside Iraq and up to 2 million refugees outside the country.² From Iraq's 2008 population of approximately 30 million people,³ this means that 13% of Iraqis were displaced at the crisis's peak.

As of mid-2016, the period of focus for this report, approximately 630,000 Syrians lived in Jordan, alongside a Jordanian population of 6.6 million. Jordan is larger than Syria, and is comparable in size to the medium-sized U.S. states of Indiana and Maine.⁴ 20% of Jordan's Syrian population lives in camps.

¹ The World Bank. 2017. "Syrian Refugees and Their Hosts in Jordan, Lebanon, and the Kurdistan Region of Iraq: Lives, Livelihoods, and Local Impacts." Internal World Bank Report.

² 2008 Iraq Situation Supplementary Appeal, UNHCR. <https://www.unhcr.org/477b8f744.pdf>. Accessed June 6, 2022.

³ World Bank Development Indicators: <https://datatopics.worldbank.org/world-development-indicators/>. Accessed June 6, 2022.

⁴ Source for Syrian populations: <https://data2.unhcr.org/en/situations/syria>. Accessed February 16, 2019. Source for 2015 Jordanian population: http://www.dos.gov.jo/dos_home_e/main/population/census2015/Main_Result.pdf. NB: In addition to 6,613,587 Jordanian nationals, the 2015 Jordanian census reports 634,182 Palestinians without Jordanian

In the early years of the refugee crisis, from 2011-2015, it was fairly simple for Syrians to enter and reside in Jordan. However, legal restrictions on entry, residency, and work ratcheted up as the conflict continued, severely limiting Syrians' ability to enter the country, and forcing the majority of those already residing there into legal and financial precarity. By 2016, the time period this report focuses on, Jordan denied Syrians a general right to work and constrained their movement. For most refugees, any interaction with state authorities, such as police or government bureaucracy, can carry significant risk. In Jordan, Syrians fear passing through checkpoints due to the risk of verbal harassment, arbitrary arrest, and deportation to Syria. Traveling even short distances might involve passing through checkpoints, which means that Syrians cannot move freely; and those who cannot legally move cannot safely work, visit family, go to hospitals to receive healthcare, or travel to urban centers to renew documents.

The displacement of the Syrian people became a refugee crisis as the civil war escalated. In early and mid 2013, the political and military prospects of the Syrian government were uncertain. By the end of 2013 and early 2014 ISIS had overtaken a number of Syrian cities in the country's east and northeast. A US-led intervention to counteract ISIS began in September 2014. Russia intervened to support the government in September 2015, leading a widespread campaign of aerial bombardment. With Western focus turned to fighting ISIS rather than supporting opposition or weakening Assad's power, and with the strength of the Russian military supporting the government, the prospect of a government victory became increasingly clear throughout 2016. By late 2017, with ISIS defeated and other opposition groups splintered and weak, media and policy discussions began to acknowledge that the government had "won" the war. As of writing, in October 2022, the government has still not consolidated control of all territory in the country, but it is clear that the government will not fall through military confrontation with armed challengers.

Life in Dara'a from 2011–late 2014

Early protests

Some of Syria's earliest pro-reform (and later, anti-government) protests began in Dara'a. After two government-linked buildings were set on fire, pro-Assad forces repeatedly opened fire on peaceful protesters in Dara'a. Despite pro forma public statements about mediation and compromise, the government's response in Dara'a was violence, repression, sieges, and misinformation. The government cast peaceful protests and sit-ins as violent Islamist gatherings and responded with snipers and curfews. Throughout the first few months of protests, sieges, and curfews, Syrian armed forces killed hundreds of civilians, including those at sit-ins and at random in the streets.⁵

citizenship, 636,270 Egyptians, and more than 380,000 non-Syrian non-Jordanian residents of other nationalities.

⁵ Dagher, Sam. *Assad Or We Burn the Country: How One Family's Lust for Power Destroyed Syria*. Hachette UK, 2019. Chapter 9.

Armed factions

The presence of opposition armed groups emerged early in the Syrian conflict. The earliest formation of an armed opposition in Syria took place in July 2011 with the declaration of the formation of the Free Syrian Army by a group of defected Syrian military officers. Battles with Syrian Army in the general area of Dara'a took place later that year, with the earliest battles to the authors' knowledge taking place in December 2011.⁶ At multiple points in 2012, 2013, and 2014, the Syrian army put the city under siege and engaged in heavy shelling.

By 2013, opposition armed groups were active and controlled territory in and around Dara'a. In March 2013 rebels took control of multiple border crossings and roughly 15 miles of the Syrian-Jordanian border.⁷ By June 2013, rebels were fighting with factions from the Nusra Front.⁸ In September 2013 there was evidence of Al-Qaeda linked groups fighting alongside rebels.⁹ Rebels controlled multiple Syria-Jordan border crossings, leading to control of the border running from Dara'a to the border of the Israeli Golan.¹⁰ In early 2014, armed groups unified into the "Southern Front,"^{11,12} ostensibly secular, although the political orientation of the groups—secular or Islamist—was contested.¹³ Indeed, the complex allegiances between numerous armed groups make such black-and-white distinctions difficult.

Although ISIS-affiliated groups may have had a minimal presence in the Dara'a region, Dara'a itself did not see major ISIS operations or fall under ISIS control at any point.¹⁴ ISIS rapidly expanded across Syria, wresting large swathes of territory from government control and taking the large northeastern Syrian city of Raqqa in January 2014. Over the next year ISIS swept across large portions of Syria to gain dominance across the majority of the country's east and northeast. By the end of 2014 increasing their control westward to the boundaries of the Rif Damascus and Suwayda governorates, roughly a two-hour drive from Dara'a.

⁶ <https://web.archive.org/web/20200929224906/https://www.aljazeera.com/news/2011/12/12/syrians-hold-strikes-amid-battles-in-south/>

⁷ <https://web.archive.org/web/20200427114214/http://www.dailystar.com.lb/News/Middle-East/2013/Mar-24/211277-activists-clashes-in-syria-near-jordan-border.ashx>

⁸ <https://web.archive.org/web/20200427114308/https://www.nytimes.com/2013/06/29/world/middleeast/syrian-rebels-claim-to-control-most-of-city-where-protests-began.html?ref=world>

⁹ <https://web.archive.org/web/20200427114318/https://www.aljazeera.com/news/middleeast/2013/09/student-deaths-reported-syria-air-raids-201392914391313718.html>

¹⁰ <https://web.archive.org/web/20131210064929/http://www.globalpost.com/dispatch/news/afp/131009/syria-rebels-seize-guard-post-jordan-border-0>

¹¹

<https://web.archive.org/web/20171010000515/http://syrianobserver.com/EN/News/26689/Moderate+Rebel+Groups+Unite+in+Southern+Syria>

¹²

<https://web.archive.org/web/20200807102303/http://www.understandingwar.org/sites/default/files/JN%20Final.pdf>

¹³ <https://web.archive.org/web/20200716005059/https://carnegie-mec.org/diwan/55054?lang=en>

¹⁴ <https://web.archive.org/web/20220114172823/https://www.mei.edu/publications/isis-and-syrias-southern-front>

Citizen interaction with armed factions

Although I do not have original data specifically on the experiences of civilians in Dara'a in relation to armed groups, we can draw lessons from the rich field of conflict studies to learn about what civilians experience during wartime.

In any war zone, armed groups, whether a state army or rebels, interact regularly with civilians. Across historical cases, armed groups rely heavily on civilians for food, water, shelter, labor, and information.^{15,16,17,18} Scholars of conflict generally maintain that armed groups would not be able to effectively hold and govern territory without some compliance and active support from some members of the civilian population. Armed groups need to access human and economic resources, notably information, whether voluntarily or through coercion, in order to hold territory. These complex relations have been demonstrated in multiple pieces of research on people living under ISIS in Iraq.^{19,20,21} Although armed groups need to rely on civilians to maintain territorial control, this does not imply that areas under one group's control are populated largely by people who support the group. Many civilians are victims of violence, comply with policies of armed groups in order to stay alive, and may personally disagree with the ideology of armed groups who control their territory.²²

Recent research on civilian-armed group interactions in Syria specifically provides some limited data on what life was like during this time for civilians in the country. Recent studies have argued that Syrian rebel groups aimed to provide governance services—food provision, electricity, and hospitals. Rebel groups also set up taxation systems—systematic means of financing their rule, distinct from simple extortion.^{23,24} In line with expectations from the research cited in the previous paragraph, rebel groups in Syria aimed to develop structured relations with civilians, much like a state would do. The Syrian government, in response, systematically aimed to destroy these attempts at developing rebel governance, both to deny rebel groups income sources but also to undercut any inchoate legitimacy that rebel groups might have enjoyed among the populace.²⁵

¹⁵ Wood, Elisabeth Jean. 2003. *Insurgent Collective Action and Civil War in El Salvador*. Cambridge, UK: Cambridge University Press.

¹⁶ Kalyvas, Stathis. 2006. *The Logic of Violence in Civil War*. Cambridge, MA: Cambridge University Press.

¹⁷ Weinstein, Jeremy. 2006. *Inside Rebellion: The Politics of Insurgent Violence*. Cambridge, UK: Cambridge University Press.

¹⁸ Lyall, Jason, Shiraito, Yuki, Imai, Kosuke. 2015. "Coethnic Bias and Wartime Informing." *Journal of Politics* 77 (3): 833–48

¹⁹ Williams, Holly. 2014. "In Captured Iraqi City of Mosul, Residents Welcome ISIS," CBS News, June 17. <https://www.cbsnews.com/news/in-captured-iraqi-city-of-mosul-residents-welcome-isis/>.

²⁰ Moradi, Arina. 2015. "Hajj Pilgrims in Limbo Can't Wait to Return to ISIS-Held Mosul," Rudaw, October 18. <http://rudaw.net/english/middleeast/iraq/18102015>.

²¹ Revkin, Mara Redlich. "Competitive Governance and Displacement Decisions Under Rebel Rule: Evidence from the Islamic State in Iraq." *Journal of Conflict Resolution* (2020).

²² Revkin, 2020.

²³ Revkin, M.R., 2020. What explains taxation by resource-rich rebels? Evidence from the Islamic State in Syria. *The Journal of Politics*, 82(2), pp.757-764.

²⁴ Ciro Martínez, J. and Eng, B., 2017. Struggling to perform the state: The politics of bread in the Syrian civil war. *International Political Sociology*, 11(2), pp.130-147.

²⁵ Martínez, J.C. and Eng, B., 2018. Stifling stateness: The Assad regime's campaign against rebel governance. *Security Dialogue*, 49(4), pp.235-253.

Jaleen, West Dara'a

Jaleen (alternatively, Jilleen) is small rural town 30 minutes driving northwest of Dara'a, a distance just over 13 miles. A mapping project by independent researcher Thomas van Linge shows that rebel forces controlled Jaleen in January 2014 and thereafter. These maps are presented for January 2014—the earliest date they are available—in Figure 1 and Figure 2. I modified Figure 2 by adding a blue star to indicate Jaleen's location and a blue X to indicate Za'atari camp. Unfortunately, I cannot locate reports on precisely when rebels first took control of the Jaleen area. By 2016, the area around the city became a flashpoint between rebels, ISIS affiliates, and government forces.²⁶ Jaleen remained under rebel control until mid-2018 when the government retook the entirety of the Dara'a region.

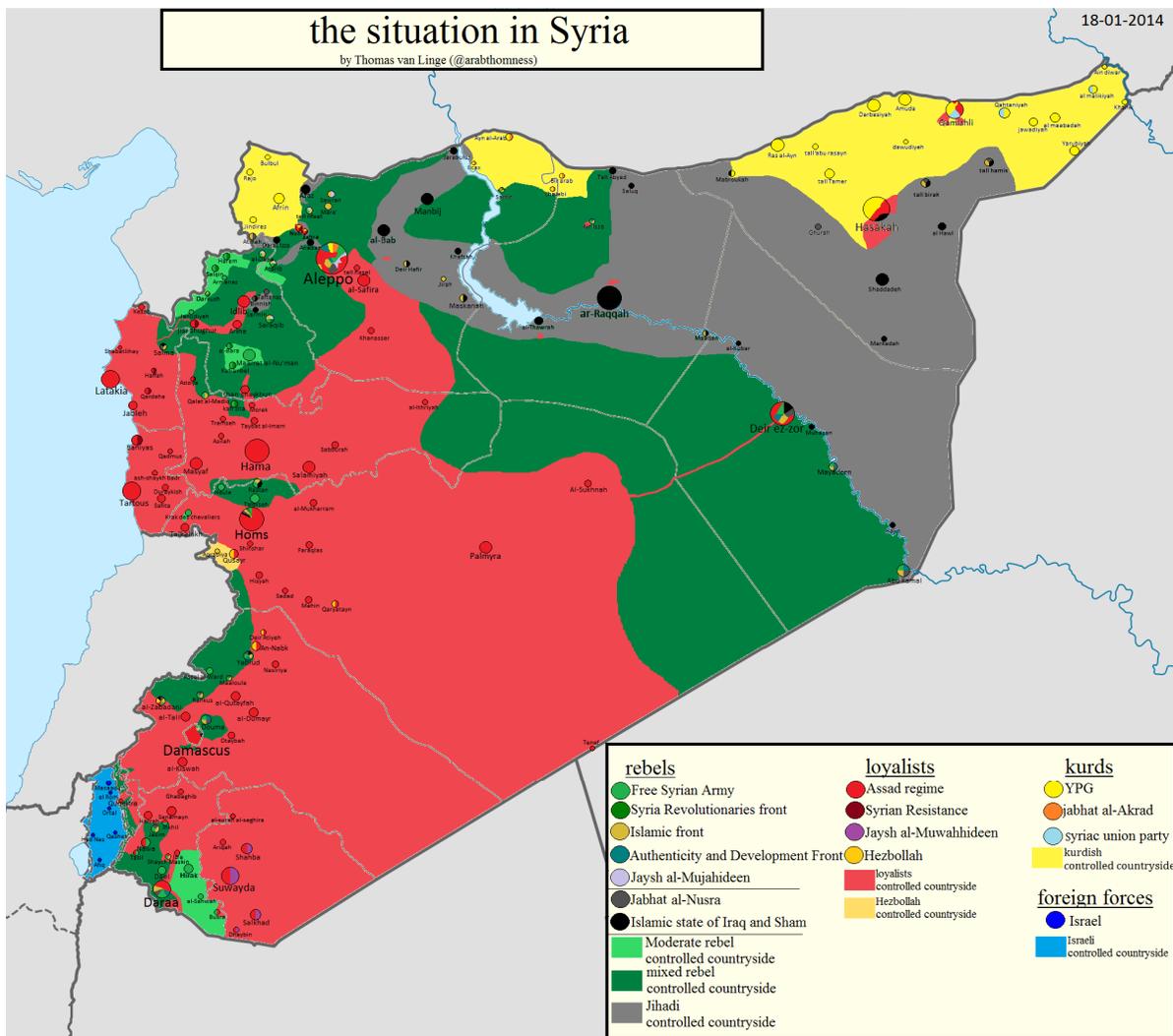


Figure 1: All of Syria marking territorial control by armed groups. Source: Thomas van Linge, independent research, January 18, 2014.

²⁶ <https://web.archive.org/web/20160801140406/https://syriadirect.org/news/fsa-nusra-and-ahrar-offensive-against-reported-islamic-state-affiliates-leaves-%E2%80%98no-safe-corridors%E2%80%99-for-trapped-civilians/>

camp, Azraq, in a remote area 65 miles east of the capital city of Amman. This second camp also received refugees who arrived at the border without proper documentation.

As we can see from Table 1, a large majority of Syrians who moved to Jordan had low levels of education. Southern Syria, where many Syrians in Jordan came from, was a poorer region of the country. Middle-class and wealthy Syrians were more likely than poor Syrians to move to Lebanon—rather than move to Jordan.²⁸

Table 1: Demographic Characteristics of Syrian Refugees Registered with UNHCR in Jordan, 2015-2016. Source: UNHCR Registration data presented in World Bank report.

Median age	17
Male	51%
Highest education level	
Finished university	0.4%
Finished high school	12%
Finished middle school	27%
Finished elementary	22%
Finished basic	25%

Refugee Camps in Jordan

Both Azraq and Za'atari camps are built more like prisons than housing. They are located in isolated arid areas, with imposing fences built to keep people in and others out. The photos of Azraq camp in Figure 3, Figure 4, and Figure 5, illustrate the arid sun-scorched location, razor-wire fences surrounding the camp, and grim industrial-style accommodations resembling small shipping containers.

²⁸ World Bank report.



Figure 3: Azraq Camp surroundings. Photo: Masterson, November 2015



Figure 4: Azraq Camp exterior. Photo: Masterson, November 2015



Figure 5: Azraq Camp interior. Photo: Masterson, November 2015

Syrians settled in Azraq and Za’atari camps were subject to severe restrictions on their movement. With a permit they could leave the camp, but only for three days at a time. They were only allowed to permanently move out of the camps with a Jordanian sponsor, a process evocatively referred to as “bailing out” a Syrian. The “bail out” option to move out of Azraq camp was cancelled in 2016, effectively preventing Syrians from legally leaving the camp. Syrians generally try to avoid being placed in the camps, as they were generally considered to be a form of detainment/imprisonment.

The camps served as a fear-inducing reminder to Syrians of their precarity and vulnerability in Jordan. In interviews, Syrians often spoke of the myriad reasons—including sometimes no reason at all—for Syrians being stopped by authorities and sent to a camp. One quotation from an interview with a Syrian community leader succinctly discusses a range of the challenges that Syrians in Jordan faced.

“Some refugees who left Za’atari in 2013 now face problems from police, who stop them and ask for their papers and give them trouble, even if the refugee has all the required paper and sponsorships. Police have even expelled some refugees to Azraq and Za’atari despite the refugees’ papers being entirely in order. It’s just that some refugees who moved out of Za’atari before June 2016 don’t need to have sponsorships. Police arrest them, detain them for many days, and then force them to move to Za’atari. There are many troubling things that refugees face here.” Syrian community leader in Huwwareh, Mafraq governorate, Jordan, October 2016

Without legal pathways to leave the camps, many Syrians smuggle themselves out. Za’atari camp hosted as many as 203,000 refugees in April 2013, but held just under 80,000 as of August 31, 2016.²⁹ The Jordanian Ministry of Interior (MOI) estimates that 54,000 people were

²⁹ UNHCR. 2016c. “Zaatari Refugee Camp Factsheet: October 2016.” UNHCR, Geneva.

smuggled out of Za'atari in the first 18 months.³⁰ As of August 31, 2016, Azraq camp only holds 54,000 of its 130,000-person capacity.³¹

Life outside the camps

Although refugee camps in Jordan often serve as an easy focal point for media representations of refugee life, the majority of refugees in the country (more than 75%) live outside of camps. This is the case worldwide as well, where more than two-thirds of refugees live outside of camps. In Jordan, Syrians are concentrated in the peripheries of urban centers in the central and northern governorates—mainly in Amman, Irbid, and Mafrq. If a family is registered with UNHCR, their children can enroll in the Jordanian public school system, and many schools are running double shifts to accommodate them. Syrians with full proper documentation, including UNHCR registration and a services card from the Jordanian Ministry of Interior, are able to access health services through the Ministry of Health at 25% of full costs. However, many Syrians do not or cannot obtain full proper documentation, and therefore cannot access these services.

Who lives in camps and outside of camps?

Syrians without proper documentation were sent to camps, whereas those with proper documentation were free to live where they pleased in the country. This policy had differential impacts based on the socioeconomic status of Syrians. A look at the World Bank data reveals patterns on the characteristics of who ended up in camps, and who avoided them. We see that refugees who live inside of camps differ systematically in several dimensions from those who live outside of camps. World Bank data shows that Syrians who were wealthier before migration or better able to liquidate assets before leaving Syria were less likely to live in camps in Jordan. Those whose home, vehicle, or other assets were destroyed are significantly more likely to be in camps—oftentimes such property destruction meant documents being destroyed or an inability to gather documents before flight due to sudden violence. Also, the average Syrian in Jordan living outside of Za'atari and Azraq, compared to refugees in the camps, lived in a residence in Syria with more rooms before the crisis.³²

Syrians who were displaced after 2013 are significantly more likely to be in camps than those who left in 2012. Focus group participants in Za'atari camp said that their first port of entry after they fled the war in Syria was the camp, and many have not found a viable way to move on to a second location, despite many desiring to do so.

Aid availability

Material hardship was a widespread reality for Syrian refugees living in Jordan. This shortfall arose, in large part, because most Syrians cannot work legally in the country. For essential items like food, drinking water, and clothing, nearly 1 million Syrian refugees in Jordan received some form of humanitarian assistance from the UN. In 2016, UNHCR distributed multipurpose cash

³⁰ <https://web.archive.org/web/20200915235710/https://en.arij.net/investigation/54000-syrians-smuggled-out-of-zaatari-camp-through-bribery-and-black-market/>

³¹ UNHCR. 2016a. "Azraq Refugee Camp Factsheet: September 2016." UNHCR, Geneva.

³² World Bank report.

assistance to roughly 30,000 families, comprising US\$91 per household per month. In addition to this cash program, the World Food Program (WFP) distributed food e-vouchers (cards that can be used at stores to buy food) to approximately 427,000 individuals in non-camp settings and 91,000 in camps. These food vouchers were loaded with money each month, delivering US\$14 or US\$28 per person depending on the household's vulnerability assessment.³³

Economic conditions for Syrians in Jordan

Syrians in Jordan face widespread economic hardship, poverty is prevalent both inside and outside of the refugee camps. **Error! Reference source not found.** shows that the vast majority of Syrians in Jordan report financial hardship, and that poverty is slightly more prevalent for refugees living outside of camps. Syrians generally faced higher prices and higher rent outside of camps, and received fewer services from humanitarian organizations outside of camps. In order to compare the food insecurity that Syrians in Jordan face, the World Bank report benchmarked the challenges they face against the reported challenges Jordanian survey respondents face. Looking at Table 2, we see that Syrians faced high levels of food insecurity in absolute and relative terms.

Table 2: Food Insecurity among Syrian Refugees in Jordan (Amman, Mafrqa, and Zarqa governorates) 2015-16. Source: World Bank report. Calculations based on the Syrian Refugees and Host Communities Survey.

	Jordanians	Syrians in Jordan
Worried about food in past week	46%	80%
Ate undesirable food in past week	40%	69%
Ate smaller or fewer meals in past week	23%	48%

Rent and housing

“The main problems facing refugees are house rentals and work opportunities. Moreover, some refugees who left Al-Za’atari in 2013 are facing problems with police who always stop them and give them trouble about their papers, even though the papers are legitimate.”

Syrian community leader in Huwwareh, Mafrqa governorate, Jordan, October 2016

Rent in Jordan is a major expense for Syrian refugees, particularly because Syrians generally cannot work legally. World Bank data shows that most refugees face difficulty paying rent. Qualitative research highlights that paying rent is among the highest priorities for refugees, and leads to risky coping strategies, with people sometimes forgoing food or going into debt in order to maintain a residence.

³³ World Bank report.

Survey data from the World Bank indicates that refugees move into poorer neighborhoods due to their relatively affordable rent prices.³⁴ One-third of the focus groups conducted in Jordan (9 out of 28) spoke about how living in substandard housing has caused health problems or exacerbated existing ones. Participants mentioned asthma and other chest ailments from moldy rooms with high humidity, water-borne diseases and skin rashes from polluted river water, mosquito-borne diseases, insect bites, and bone diseases due to a lack of sunlight in living quarters. Living in cramped spaces has increased tensions and raised stress levels in households, affecting the mental health of refugee families.

“The houses are wet. The children are always sick.”

Focus group with Syrian women, Shafa Badran, Amman governorate, Jordan, Oct. 2016

“In the past we used to live with each other. Now we cannot bear each other. Everybody fights with the other. Our stress has increased. We look older than our years.”

Focus group with Syrian women, Amman, Jordan, Oct. 2016

Healthcare and education

Syrian refugees in Jordan reported facing fundamental constraints on their ability to access healthcare and send their children to school. However, the problems that Syrians faced in accessing hospitals and schools are not, largely, due to problems particular to those services. Instead, the problems are driven by poverty and discrimination, which have indirect impacts on Syrians’ ability to access important services including healthcare and education.

Education

For Syrians with children, multiple obstacles limit their options for education. First, some schools refuse to enroll Syrian children at all, which Syrians in focus group discussion attributed to anti-Syrian discrimination. In one striking example, a focus group participant stated:

“I have 3 children. [...] The principal at [our local] school doesn’t like Syrians. I went to register my children at the school. The principal lost her temper, started swearing and shouting about Syrians.”

Focus group with Syrian women, Shafa Badran, Amman governorate, Jordan, October 2016

In addition to discrimination from school officials as above, Jordanian children were the most common perpetrators of discrimination in parents’ stories. In the focus groups, most parents who told stories about their children being bullied because they are Syria kept their children in school. A minority of parents pulled their children out of school due to the bullying. Although multiple parents told stories about trying to get principals and teachers to intervene to prevent bullying, none reported that such efforts were effective in improving their children’s experiences at school.

A number of other obstacles to schooling pertain to the multiple costs of enrolling children. First, families face the opportunity cost of sending a child to school rather than having the child work

³⁴ Masterson qualitative fieldwork. World Bank survey data.

to earn money. This tradeoff is challenging for families facing extreme hardship, even if they want their children to get an education.

“My father is old and he cannot work anymore. So my brothers had to stop attending school in order to work. Now they work wherever they can find employment in order to support our family.”

Focus group with Syrian women, Huwwareh, Mafraq governorate, Jordan, October 2016

Second, a large share of Jordan’s schools are private. World Bank data estimate that about 40% of Jordanian students are studying in private schools.³⁵ For most Syrian refugees, the cost of tuition at these private schools is prohibitive, further limiting the schooling options available to Syrian children.

Focus group participant: Recently, I went to the local private school. I told the principal that we are Syrians and I asked about the fees; the annual fee is 600 JOD (~850 USD), not including the cost of transportation. He told me that the best he could do to help me would be to allow me to pay the fee on a monthly basis [rather than in a lump sum at the beginning of the year]. He said I could pay 70 JOD (~99 USD) per month, but even this is impossible for us. [...] If the principal had allowed me to pay 40 JOD (~56 USD) per month, I could register my son.

Moderator: Did you ask any organizations to help you?

Participant: Yes. No NGOs help with school costs. I went with my neighbor to all the organizations.

Focus group with Syrian women, Shafa Badran, Amman governorate, Jordan, October 2016

Third, families need to pay for transportation to school. For reasons discussed above related to tuition, sometimes the best option for a child’s education is a school that requires a significant commute. In these cases, parents reported paying for a bus for the child to take to and from school. Participants reported that one month of bus transportation costs 15-20 JOD (21-28 USD) per child per month.³⁶ Some parents reported that they weren’t able to enroll their child in school because of transportation costs.

Healthcare

The challenges that Syrians report surrounding healthcare are similar. Even when Syrians can access healthcare, the cost is often prohibitive. As of 2015-16, UNHCR covered 75% of the cost for many procedures for Syrian refugees in Jordan. But even the remaining 25% was still prohibitively expensive for some Syrians.

“When you have UNHCR support you, you can go to any hospital but you still have to pay 25% from the fee. The hospital near me is friendly and welcoming to Syrians. Hospitals here are not a problem, [it is the cost]. [...] Consider people with chronic

³⁵ “It is time to restore public education in Jordan.” 2015. World Bank. <https://blogs.worldbank.org/arabvoices/it-time-restore-public-education-jordan>. Accessed June 9, 2022.

³⁶ Masterson qualitative research, Jordan, 2016.

kidney disease [who need Haemodialysis three times per week]. Every time they go to the hospital, they have to pay 48 dinar (~68 USD) and they do that three times per week.”
Focus group with Syrian men, Mafraq, Mafraq governorate, Jordan, October 2016

Labor market access and policies

Table 3 shows the sectors where Syrians in Jordan work. We see that nearly one half of Syrians in Jordan worked in manual labor including construction, agriculture, and manufacturing. Furthermore, due to challenges with permitting (discussed below), many Syrians engage in informal work, lack job security, and often require long searches between positions.

Table 3: Distribution of Working-Age, Employed Syrian Refugees in Jordan by Sector. Sources: Syrian Labor Force Survey (all Syrians, 2011) and calculations based on World Bank report.

Industry Category	Share
Construction	18.3%
Agriculture	17.2%
Wholesale/Retail	10.2%
Manufacturing	9.9%
Public administration	4.5%
Food & Beverage	4.3%
Professional Services	1.5%
Household work	<1%
Other	34.2%

Syrians in Jordan were sometimes forced to work in lower-skilled jobs than their qualifications. Refugees often face substandard conditions in work. Because refugees’ employers need to serve as a sponsor for a work permit, refugees have little bargaining power with employers and limited ability to report abuses. Overall, the conditions limit refugees’ job options, income, and job security. Refugees even have little recourse if an employer decides to simply withhold pay for work completed. The World Bank survey recorded the wages, qualifications, and job of both Jordanian and Syrian respondents. The data show that Syrians in Jordan suffer a 39-49% pay penalty relative to Jordanians for similar work. My interviews in Jordan capture the challenges that Syrians face around work in their own words:

“I was a lawyer in Syria, but now I work in a supermarket.”
Focus group with Syrian men, rural Irbid governorate, Jordan, October 2016

“My monthly salary is JD 320 [US\$452]. A Jordanian citizen who does the same work makes more than JD 400 [US\$565]. I would ask for an increase, but I cannot because I am Syrian. I either have to accept their offer or get fired.”
Focus group with Syrian men, Amman, Jordan, October 2016

“All the Jordanian women make JD 10 [US\$14] for every two hours, and I get JD 7 [US\$10] for the same work.”
Focus group with Syrian women, urban Irbid governorate, Jordan, October 2016

Jordan has struggled to develop an effective permitting process for Syrian refugees. During the initial years of the crisis, employers had to go through a lengthy and expensive process to sponsor refugees for a work permit, and refugees themselves needed to pay a large sum of money to obtain a permit.

In early 2016, as part of a new agreement with several donors, the Jordanian government agreed to issue free work permits to Syrian refugees, but still imposed restrictions on the employers. One such limitation is that many high-paying, high-skilled professions, are off-limits for Syrians, including those in medicine and nursing, engineering, administrative jobs, sales, education, and hairdressing. Jobs available to non-Jordanians include janitorial work, restaurant jobs, construction, and agriculture.³⁷

As of November 10, 2016, work permits had been granted to 32,451 Syrians in Jordan.³⁸ This number highlights that few Syrians received work permits through the program, less than 5% of Syrians in Jordan in total. My qualitative fieldwork suggested that many refugees were reluctant to formalize their work permit because it would require interacting with state authorities. As discussed above, many Syrians aimed to minimize interactions with state authorities from fear of a risk of arrest and deportation. Analysis in the World Bank report found that restrictions on firms also depressed take-up. Permits required firms to pay minimum wages and social security benefits, which many firms were not willing or able to do for Syrian employees.³⁹

Authorities, documentation, and legal vulnerability

Another major challenge that Syrians report is fear of being detained by authorities for improper documentation. Traveling even short distances may involve passing through checkpoints or being confronted by police in another way. These fears that Syrians cannot move freely; and those who cannot legally move cannot safely work, visit family, go to hospitals to receive healthcare, or travel to urban centers to renew documents. In all 24 focus groups I organized outside of camps in Jordan, participants raised this issue. However, obtaining work authorization was a costly and cumbersome process at the time of the research. Consequently, refugees put themselves at risk by working. If caught, they were made to sign pledges that they will not repeat the offense of working without authorization.

“I used to work as a stone mason, but I now work in construction because I don’t have a work permit. The work permit costs JD 400 [Jordanian dinars, US\$560]. We have to pay the sponsor separately, and the sponsor must have his trade registered.”

Focus group with Syrian men, rural Irbid governorate, Jordan, October 2016

“My husband was a blacksmith in Syria. He is not allowed to do this job in Jordan. He was arrested twice and had to sign a pledge that he would not do this work again.”

Focus group with Syrian women, rural Irbid governorate, Jordan, October 2016

³⁷ Syria Needs Analysis Project. 2013. “Legal Status of Individuals Fleeing Syria.” *ReliefWeb*, June 14. http://reliefweb.int/sites/reliefweb.int/files/resources/legal_status_of_individuals_fleeing_syria.pdf.

³⁸ World Bank report p. 97

³⁹ World Bank report, p. 98

The most serious fears for Syrian refugees in Jordan are being sent to the camps or being deported. Again, in all 24 focus groups outside of camps in Jordan, refugees discussed fears of forced removal to Azraq or Za'atari camps or involuntary deportation to Syria. Human Rights Watch reports that during 2016 and 2017, the Jordanian government was forcibly deporting hundreds of Syrians every month.⁴⁰ Reports by Human Rights Watch find that many people who return (or are forced to return) to Syria face dire human right abuses, including documented cases of detention and torture.⁴¹

“My nephew was arrested because he has no work authorization. The police told him to choose between going back to Syria or moving to Azraq camp. So, he chose Azraq. After that he fled from the camp because he has little children, and the conditions in the camp are very bad. And now he has to live in Jordan illegally, without proper papers.”

Focus group with Syrian women, rural Irbid governorate, Jordan, October 2016

“Police came to my workplace and asked for my identity card and work permit, which I did not have. They took me to the police station. I was moved seven times. After three days of moving among security branches, they took me to Za'atari camp and wanted to deport me to Syria. I fled from the camp. I have been struggling with my employer for two months to get a work permit.”

Focus group with Syrian men, rural Amman governorate, Jordan, October 2016

Legal vulnerability has implications beyond mobility and labor market access, affecting many aspects of people's lives, including interpersonal dispute resolution and marriage. A Syrian in Jordan who founded and ran a small community organization describes the diverse range of challenges that Syrians face due to legal vulnerability.

“Refugees rarely engage in any sort of legal dispute with Jordanians due to their lack of knowledge of Jordanian law. They don't know how to defend their rights, such as to receive just payment from employers when they work. In the sessions that my community organization runs, we teach refugees how to defend their rights and stop being victims. We tell them how to complain in order to collect their money for work completed even if they don't have work permits. In the cases of marriage and divorce, things differ between Syria and Jordan. In Syria, we would conduct religious marriage proceedings without authenticating them in court. However, people in Jordan complete marriage proceedings in court before any religious ceremony. There are many problems in the Syrian community. Most of them are financial problems due to the lack of job opportunities. Some refugees fear just going to work. In my case, I don't dare to go work in Irbid [4 miles away] because I'm an old man and I wouldn't be able to flee from police when they raid work sites.”

Syrian community organization leader in Huwwareh, Mafraq governorate, Jordan, October 2016

⁴⁰ “Jordan: Syrian Refugees Being Summarily Deported.” 2017. Human Rights Watch. <https://www.hrw.org/news/2017/10/02/jordan-syrian-refugees-being-summarily-deported>. Accessed June 7, 2022.

⁴¹ “Jordan: Syrian Refugees Being Summarily Deported.” 2017. Human Rights Watch. <https://www.hrw.org/news/2017/10/02/jordan-syrian-refugees-being-summarily-deported>. Accessed June 7, 2022. Also, “Syria: Returning Refugees Face Grave Abuse.” 2021. Human Rights Watch. <https://www.hrw.org/news/2021/10/20/syria-returning-refugees-face-grave-abuse>. Accessed June 7, 2022.

Conclusion

This report reflects my professional opinion at the time of this writing based on the data sources listed earlier in this report. Please do not hesitate to contact me should you desire clarification or further discussion. I can be reached at masterson@ucsb.edu.

A handwritten signature in black ink, appearing to read "Daniel Masterson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Daniel Masterson, PhD
Assistant Professor, Political Science
University of California, Santa Barbara

October 24, 2022

Sam Saylor, Esq.
Assistant Federal Public Defender
Western District of Pennsylvania
1001 Liberty Avenue, Suite 1500
Pittsburgh, PA 15222

Re: United States v. Mustafa Alowemer, Case no: 19-cr-219 (W.D. Pa.), DOB [REDACTED]

Dear Attorney Saylor,

This report is written pursuant to your request for an evaluation for the purpose of providing the court with input regarding the sentencing of Mr. Mustafa Alowemer.

Mr. Alowemer is a 24-year-old single man who resided in Pittsburgh, PA. He is currently incarcerated in the Northeast Ohio Correction Center in Youngstown, Ohio.

On September 16, 2021, Mr. Alowemer entered a plea of guilty to attempting to provide material support to a designated foreign terrorist organization (ISIS).

You asked me to opine on the factors to be considered in sentencing including: the online environment Mr. Alowemer was involved in as shaped by ISIS targeted recruitment strategies, how it attracted young vulnerable males like Mr. Alowemer, and how that might have impacted his radicalization.

I am a licensed physician in the State of Illinois. My license number is 36090563. I declare that the information contained within this document was prepared and is the work product of the undersigned and is true to the best of my knowledge and information.

For the past 15 years, I have been active in the space of violent extremism and targeted violence prevention. I have conducted multiple research studies on these topics funded by the National Institute of Justice and the Department of Homeland Security. I have collaborated with federal and state and local law enforcement and communities in working with individual cases and strengthening community-based prevention. I have consulted with governments and service providers in multiple countries regarding these matters. I have also conducted assessments and provided court testimony in both federal and state court.

For this report I reviewed multiple reports and academic papers concerning ISIS and on-line recruitment which are listed in the reference section. I also drew upon my knowledge based on practice with multiple cases of persons recruited by ISIS, which evidence some of the same patterns of on-line recruitment seen in this case. I also reviewed pertinent forensic scientific literature on adolescent brain development. Lastly, I relied upon the psychological evaluation and report on Mr. Alowemer, completed by Lucy Guarnera, Ph.D.

Counsel provided me with multiple documents, discovery materials, medical records, educational records, and interview notes including:

1. Counsels' notes from meetings with Mr. Alowemer, various dates.
2. Medical Records
 - a. Mahoning County Jail
 - b. University of Pittsburgh Medical Center (UPMC)
 - c. Allegheny General Hospital (AGH)
 - d. Smithfield Medical Clinic, Pittsburgh, PA
 - e. Squirrel Hill Health Center, Pittsburgh, PA
3. Education
 - a. Pittsburgh Public School records
4. Discovery Materials
5. Dr. Guarnera's report

In this report, I will: 1) describe my findings based upon the records presented to me and my research; 2) summarize my conclusions.

FINDINGS

Mustafa Alowemer's On-Line Activity

Between July 2017 and June 2018, prior to any contact with FBI agents, Mr. Alowemer visited websites that included sites where ISIS members and supporters regularly post extremist content. He also communicated with an ISIS supporter on Facebook. His known on-line activity during that time is summarized below.

July 2017: Mr. Alowemer accessed a known dark website that routinely posted extremist propaganda and recruitment materials in support of ISIS.

April 2018: The "Intro" section of Mr. Alowemer's account included a phrase in Arabic text that an FBI linguist translated as "hoping to Allah that he dies in a way that does not require the traditional funeral cleansing and burial rituals."

Prior to June 13, 2018: Mr. Alowemer communicated on several occasions with at least two other Facebook accounts attributable to WAHEBA ISSA DAIS ("DAIS"), the main subject of another pending FBI investigation who is herself a pledged supporter of ISIS.

April to May 2018: Mr. Alowemer became "friends" with at least two of the accounts attributable to DAIS.

April 16, 2018: Mr. Alowemer responded to a post about ISIS ("While our nation is getting stronger day after day with the help of God, our enemies are getting weaker and weaker until comes God's promise.") with a comment in Arabic purportedly expressing solidarity with ISIS.

April 16, 2018: Mr. Alowemer replied to a post about Sufis in Nigeria, "God curse them. Fucking stupid people what the fuck they think." He was reprimanded for his language

and replied, “I am sorry brother but I didn't control myself when I see those people really doing that,” both individuals conform to ISIS’s belief that Sufis are inferior Muslims and that violent attacks carried out against them and their places of worship are justified because of their heretical views.

May 5, 2018: Mr. Alowemer replied to a post about ISIS (“Be devoted because the war against you is ferocious and in God’s will it is only going to increase our persistence and determination”) with a comment in Arabic that was translated by an FBI linguist as “in God's will,” which purportedly expressed solidarity with ISIS.

May 10, 2018: Mr. Alowemer responded to a post with a comment in Arabic, translated by an FBI linguist as follows: “God is great. Praise to you, O God. For you to be satisfy. O God give victory to the Islamic State militants [Translator’s Note: ISIS].”

ISIS and Targeted Recruitment

The Islamic State (IS), also known as the Islamic State in Iraq and Syria (ISIS) is a terrorist organization that follows Salafism, a strict interpretation of Sunni Islam. The group’s ultimate goal is to establish a worldwide caliphate, or a state governed by Islamic law. ISIS has recruited large numbers of individuals to join its cause. Many of these individuals recruited from multiple different countries, including the U.S., became foreign fighters and joined ISIS in Iraq and Syria. The National Counterterrorism Center has characterized ISIS’s recruitment strategies as “the most sophisticated propaganda machine of any terrorist organization”(NCTC, 2008).

The Islamic State is known for targeting their recruitment efforts to individuals who are the most susceptible to radicalization. This includes mostly males under 25, in non-Muslim Western countries, who feel isolated, rejected and/or humiliated due to the adversity they have experienced in their lives (Vidino & Hughes, 2015). ISIS targets those who have experienced some combination of displacement, violence, discrimination, limited educational or career opportunities, and poverty and who may also disagree with the government’s foreign policies regarding Muslims in other countries, especially the Mideast (Ponder & Matusitz, 2017).

Persons who experience stress and trauma are targeted by ISIS and other extremist organizations. Here it is relevant to note that in July 2022, Mr. Alowemer was assessed by Lucy Guarnera, Ph.D. using standardized measures and found to meet diagnostic criteria for *Post Traumatic Stress Disorder, Complex Post-Traumatic Stress Disorder, and Major Depressive Disorder*. Dr. Guarnera also described how these conditions explained his *hypervigilance to threat* and *suggestibility and compliance* which she concluded impacted his interactions with the persons he met on-line and made him more susceptible to radicalization by ISIS.

The On-Line Environment

The Internet, social media and peer-to-peer platforms are essential to ISIS’ ability to recruit globally including the U.S. (Gartenstein-Ross, 2016). The Internet facilitates communication with those individuals living in the West who can be very vulnerable to radicalization.

Many vulnerable late adolescent males go on-line in search of answers and become part of a virtual community or ecological niche. ISIS has worked hard to establish and sustain this niche

by providing content that depicts violence and military victories and refers to fundamentalist Islamic ideology. ISIS members will post violent extremist message and then “like” or endorse such messages. They will also send personal messages to new visitors, encouraging them to join the conversation. This ecological niche into which such persons enter is designed to engage them, normalize them to extremism and violence, and motivate them to support and conduct violent acts which will promote the ISIS cause (Mitts, Philips, Walter, 2022).

Social media plays a crucial role in the process of radicalization and, at times, mobilization of U.S.-based ISIS sympathizers (Vidino & Hughes, 2015). ISIS employs Facebook, Instagram, Skype, and YouTube to develop an interpersonal dialogue with people interested in Islam and target potential recruits. Thus, potential recruits gain near-instantaneous access to visually powerful information that appears to substantiate the extremists’ political and/or religious claims. ISIS members provide frequent social rewards to their young recruits, from daily greetings, to affirmations and compliments, which keeps the recruits engaged, and makes them feel like peers.

More than 300 American and/or U.S.-based ISIS sympathizers have been specifically identified by academic researchers at George Washington University as being active on social media and spreading propaganda (Vidino & Hughes, 2015). American ISIS sympathizers are particularly active on Twitter, where some accounts (the “nodes”) are the generators of primary content, some (the “amplifiers”) just retweet material, and others (the “shout-outs”) promote newly created accounts of suspended users (Vidino & Hughes, 2015). In 2016, Twitter suspended 125,000 accounts which were linked with ISIS (Guynn and Elizabeth Weise, 2016).

A 2010 report by NCTC contends that “the Internet and related information technologies—such as Web forums, blogs, social networking sites, and e-mail—that serve as platforms for extremist propaganda and discourse can enable and advance the radicalization process and help mobilize individuals who may not be geographically near key extremist figures or significant events” (NCTC, 2010). It can be incredibly empowering (as well as terrifying) for a young person to have direct communication with a terrorist in Syria. For foreigners, the dream of becoming more significant and having a purpose and a positive Islamic identity can readily overtake one’s caution (Awan, 2017).

FBI Director Comey, in July 2015 testimony before the U.S. Senate, noted: “Social media has allowed groups, such as ISIL, to use the Internet to spot and assess potential recruits. With the widespread horizontal distribution of social media, terrorists can identify vulnerable individuals of all ages in the United States—spot, assess, recruit, and radicalize— either to travel or to conduct a homeland attack. The foreign terrorist now has direct access into the United States like never before”(Comey, 2015).

Three main narratives are used by ISIS to appeal to its possible recruits: religious obligation, political grievances, and the success of the Islamic State. Research using word cloud frequency tools identify the key words being used to depict ISIS. For example, from the top 20 words used, there were some key words that stood out as having direct influence over the recent actions of ISIS recruitment propaganda. They included the words; ‘Brothers’ ‘rise up’, ‘Claim’ ‘Victory’;

‘Haya’, ‘Jihad’, ‘Rush’ and ‘Battlefield’. The use of the terms ‘rise up’ and ‘victory’ were also used in relation to Muslims as a justification and ‘call for action’ (Awan, 2017).

In this manner, ISIS creates a ‘them vs us’ narrative. Surrounded by other radicals, the Internet becomes a “virtual echo chamber” in which the most extreme ideas and suggestions receive the most encouragement and support (Vidino & Hughes, 2015). It creates a new social environment in which otherwise unacceptable views and behavior are normalized. The on-line ecological niche into which such persons enter is designed to engage and recruit them to support and conduct violent acts which promote their cause. Its effectiveness in doing so is linked with the ways that social media works upon brain chemistry in adolescents to influence their behavior.

Notably, similar strategies utilizing social media are used white supremacist organizations (Daniels, 2017).

Scientific Literature on Adolescent Brain Development

Neuroscience studies have been increasingly applied in several areas of criminal law, including the assessment of the adolescent’s brain capacity for culpability. The findings of these studies can help to explain adolescent behavior, by identifying the underlying brain circuit processes. These can help to explain how Mr. Alowemer and other adolescents have become engaged by ISIS through on-line communication.

Research has demonstrated that adolescent’s behavior demonstrates important differences from adults in terms of such phenomena as: 1) greater propensity for risk-taking and approach towards potential threats; 2) need for peer approval and vulnerability to peer pressure; and 3) poor judgment and decision making with lack of self-control (Chein, 2011; Cohen & Casey, 2014). Mr. Alowemer’s visits to the dark web, his entering into communication with ISIS supporters, and his eventual agreement to cooperate with them, are examples of his poor judgement and decision-making. Mr. Alowemer’s insult of Sufi’s in Nigeria is one example of his poor self-control.

Based upon neuroscience evidence, these behavioral characteristics of adolescence can be explained by the “imbalance model of brain development” (Somerville & Casey, 2010). According to this model, in adolescents, the prefrontal cortex (involved in executive control, reasoning, and decision making), is not yet as developed as the limbic system (involved with motivational and emotional responses, including a rewarding feeling when taking a risk). The prefrontal cortex does not actually reach maturity until about 25 years of age (Gogtay et al., 2004). Because during adolescence the limbic system is active, there is an imbalance which impacts behavior.

As a consequence of this imbalance, the two brain systems in emotionally charged adolescents are less developed. “(T)his less developed circuitry appears even less capable of adequately regulating emotions and actions, resulting in a teen exercising less self-control in making a risky decision, even when he or she knows better.” (Cohen & Casey, 2014, p. 63-64). This can help explain in part why adolescents approach, rather than retreat, from potential threats or dangers.

Peer influence has also been shown to be important in leading adolescents to engage in risky behaviors. Adolescents have an intense need for acceptance and approval. The fear of rejection by a peer may make teens more likely to engage in risky behaviors, even illegal behaviors. Teens will try to emulate peer behavior. A study by Chein et al. (2011) demonstrated that adolescents, in the presence of peers, made more risky decisions, and these were associated with heightened activity in the limbic circuits, circuits in the brain that mediate motivational and emotional responses. Cohen and Casey explained: “In the heat of the moment, as in the presence of peers, potential threat, or rewards, emotional centers of the brain hijack less mature prefrontal control circuits during adolescence, leading to poor choice behaviors” (2014, p. 65).

Research has also shown how social media interacts with the adolescent brain. “Likes” and other social rewards delivered by social media contacts feel more satisfying to the adolescent. The adolescent’s increased number of receptors for oxytocin and dopamine in the ventral striatum have a greater impact on their behavior (Crone & Konijn, 2018). On top of this, Mr. Alowemer’s diagnosis of PTSD, with its symptom of hypervigilance, would make it more likely for him to agree with the points of view of those he considered his peers.

In summary, “The research confirms a guiding principle –the distinction between youth and adults is not simply one of age, but one of motivation, impulse control, judgment, culpability and physiological maturation.” (Jensen, 2009). Consequently, courts of law have agreed that juveniles are different from adults, and therefore sentencing should take this into account.

CONCLUSIONS

ISIS, and the online environments strategically established by ISIS, invited Mr. Alowemer into an ecological niche which prepared a traumatized and psychologically vulnerable young man to make choices he may have been unlikely to make otherwise.

At the time of his offense, Mr. Alowemer was young, traumatized, depressed, and suicidal. He felt extremely guilty for having left Syria, and for not being able to help his parents or friends. He wanted to do something significant to help Syrians and other Muslims.

Like many young people in his generation, Mr. Alowemer went online seeking meaning, community, and helpful actions regarding Syria and Muslims. The on-line community which Mr. Alowemer became immersed in was dominated by ISIS and its targeted recruiting strategy designed to ensnare young vulnerable persons just like him. It led him to feel less alone and more empowered around the ISIS cause.

ISIS disseminates narratives and images which can radicalize and mobilize persons to take violent actions. ISIS also provides empowering and supportive messaging to vulnerable persons, such as Mr. Alowemer.

Because of immaturity in brain development due to his age, and further aggravated by the traumas he was exposed to, and the positive reinforcement on social media, Mr. Alowemer approached, rather than retreated, from potential threats or dangers presented by ISIS, and eventually the FBI agents.

Although ISIS's targeted recruitment of individuals like Mr. Alowemer does not in any way excuse his behavior, it at least explains his actions in the context of a larger phenomenon that has been extraordinarily effective at preying on adolescents like Mr. Alowemer who have experienced extreme trauma. These same approaches are used not only by ISIS but also by white supremacist recruiters.

Fortunately, such recruitment tactics do not succeed in irreversibly converting individuals to violent extremists. Evidence-informed rehabilitation and simply aging out of adolescence has proven to be effective in rehabilitating violent extremists and preventing further violent or criminal behavior.

I am happy to answer any questions that you may have regarding this report. I can most easily be reached by email at smweine@gmail.com or by cell phone at 312-388-8416. Thank you for inviting me to consult on this case.

Sincerely,

A handwritten signature in black ink, appearing to read "Stevan Weine". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stevan Weine M.D.

References

- Awan, I. (2017). Cyber-Extremism: Isis and the Power of Social Media. *Society*, 54, 1-12.
- Chein, J., Albert, D., O'Brien, L., Uckert, K., & Steinberg, L. (2011). Peers increase adolescent risk taking by enhancing activity in the brain's reward circuitry. *Developmental Science*, 14(2), F1-F10.
- Cohen, A. O., & Casey, B. J. (2014). Rewiring juvenile justice: The intersection of developmental neuroscience and legal policy. *Trends in Cognitive Sciences*, 18(2), 63-65.
- Crone, E.A., Konijn, E.A. Media use and brain development during adolescence. *Nat Commun* 9, 588 (2018). <https://doi.org/10.1038/s41467-018-03126-x>
- Daniels, J. 2017. Twitter and White Supremacy: A Love Story. Dame. <https://www.damemagazine.com/2017/10/19/twitter-and-white-supremacy-love-story/>
- Freiburger, T., & Crane, J. 2008. A systematic examination of terrorist use of the internet. *International Journal of Cyber Criminology*, 2(1), 309–319.
- Gartenstein-Ross, D. “Testimony to the Committee on Homeland Security and Governmental Affairs, United States Senate,” in *Jihad 2.0: Social Media in the Next Evolution of Terrorist Recruitment*, S. Hrg. 114–438 (Washington, D.C.: U.S. Government Publishing Office, 2016), 12-21, <https://www.hsdl.org/?abstract&did=798565>.
- Gogtay, N., Giedd, J. N., Lusk, L., Hayashi, K. M., Greenstein, D., Vaituzis, A. C., ... & Rapoport, J. L. (2004). Dynamic mapping of human cortical development during childhood through early adulthood. *Proceedings of the National Academy of Sciences of the United States of America*, 101(21), 8174-8179.
- Guynn, J and Weise, E. “Twitter Suspends 125,000 ISIL-related Accounts,” *USA Today*, February 5, 2016, p. A1.
- Jensen, L. (2009). Social workers concerned about life sentences. *The North Platte Telegraph*. Retrieved from http://www.nptelegraph.com/opinion/letters_to_the_editor/social-workers-concerned-about-life-sentences/article_25245af7-c6b9-53a4-a659-fb5b605400dc.html

Mitts, T., Phillips, T. and Walter, B. Studying the Impact of ISIS Propaganda Campaigns. *The Journal of Politics* 2022 84:2, 1220-1225/

National Counterterrorism Center, "Radicalization Dynamics: A Primer," September 2010.

Ponder, S., & Matusitz, J. "Examining ISIS online recruitment through relational development theory." *Connections* 16, no. 4 (2017): 35-50.

Nissen, T.E. "Terror.com – IS's Social Media Warfare in Syria and Iraq," *Contemporary Conflicts* 2, no. 2 (2014): 1-8.

Somerville, L. H., & Casey, B. J. (2010). Developmental neurobiology of cognitive control and motivational systems. *Current Opinion in Neurobiology*, 20(2), 236-241.

Testimony of James B. Comey, Director, Federal Bureau of Investigation (FBI), Senate Select Committee on Intelligence, Counterterrorism, Counterintelligence, and the Challenges of "Going Dark," July 8, 2015.

U.S. Senate Committee on Homeland Security and Governmental Affairs (HSGAC), "Violent Islamist Extremism, the Internet, and the Homegrown Terrorist Threat," May 8, 2008.

Vidino, L. & Hughes, S. *ISIS in America: From Retreats to Raqqa*. The Program on Extremism. George Washington University, 2015.

Wilner, A. & Dubouloz, C.J. "Homegrown Terrorism and Transformative Learning: An Interdisciplinary Approach to Understanding Radicalization," *Global Change, Peace & Security* 22, no. 1 (2010): 33-51.

To Your Honor Judge Horan,

Greetings to you. I am Asya Bint Abdul Karim Awaimer, born in the Golan in 1965. I am married and live with my husband and children in the refugee camp in Syria, Daraa Governorate. I have four boys and three girls.

As for Mustafa, my relationship to him is that I am his aunt, I am the sister of his mother. What I know about this young man is that he is a good kind man and the has a good upbringing. Mustafa is a respectful and friendly person to others, and he treats his relatives, neighbors, and peers kindly. He is also a person who loves children.

After he moved to America, he continued his studies there, and he was a diligent student and interested in studying, as we had entrusted him before his travels. We, his relatives and his family, testify that he was a great helper to the neighbors when they need help, and he is a popular young man among his schoolmates. He was one of the contributors to cleaning and plant the school garden, and who respected and loved the teachers in the school.

In conclusion, I appeal to your honorable justice to look with kindness and compassion for this ambitious young man. Asking you to forgive him and give him a second chance, as this incident affected him greatly and his family from a psychological and life point of view. And Mustafa learned from his mistakes.

With all due respect to your honor,
Asya Bint Abdul Karim Awaimer

Dear Judge Horan,

Greetings to you. My name is Nora Hassan Fares, born on [REDACTED]. I belong to a family of 6 people and I live in Dallas Texas. I work in Home Care to help my mother.

Mustafa Al-Awaimer's family and our families are neighbors and friends since childhood and until now. I have known Mustafa Al-Awaimer since his childhood when we went to primary school together. I used to see Mustafa every day, and after school, we used to play together in the neighborhood.

I witnessed Mustafa in many good and influential situations. Mustafa is a good person who loves to help others because I saw him helping his family a lot. Mustafa is an ambitious and passionate person who loved to study and was diligent in his studies. He was one of the students who respected his teachers and colleagues the most.

Due to the circumstances of the war in Syria, he did not complete his studies and could not achieve his dream. He was forced to work to help his sick father. Mustafa had a positive impact on me, as he was a good example of a responsible person. Even though he was a small child, he motivated me a lot to work and help my family.

After my family and his family moved to the United States, Mustafa returned to his studies again to achieve his dream, which he could not achieve before due to war conditions, and he managed to graduate from high school in the US. He invited us all to attend his graduation ceremony. He once told me that he hoped to become an engineer.

Unfortunately, Mustafa did not complete his studies because of this incident, so we ask you to look at Mustafa with mercy and give him another chance to return to his studies and his family and to complete the dream that he could not complete.

Honorable Judge, we ask for mercy and forgiveness for all of the Al-Awaimer family.

With all due respect,
Nora Faris

Dear Judge Horan,

My name is Rania Muhammad Al-Nuaimi, I am 30 years old, married, and have two children, and I live in Saudi Arabia. I have known Mustafa since he was a child, as he is my cousin. We have a strong relationship with Mustafa and his family, as we used to live in the same city and exchange weekly visits. I have known Mustafa as a shy, calm, and polite person who loves everyone and takes the initiative to assist anyone who needs it. His grandmother was sick and he was keen to take care of her as she was bedridden. Mustafa used to visit her several times daily, bring her what she needs, prepare her food, give her the medicine she requires constantly, and take her to the garden of the house to entertain herself. Moreover, in an unforgettable situation, brother Khaldoun fell into a sudden health condition, and Mustafa quickly called an ambulance, escorted us to the hospital, and donated blood to my brother, as he was one of the biggest reasons behind my brother's recovery.

Mustafa is a very honest and good person, and he is a person who adheres to the laws and policies of the places in which he is located. I remember that one of his friends asked him to leave school because he did not want to attend some classes, but Mustafa refused to violate the school rules and refused his friend's request.

In another situation, one of his friends tried to convince him of ways to cheat in exams, but Mustafa was categorically refusing and insisting on studying hard so that he could succeed with superior effort and fatigue.

Mustafa and his family suffered from the scourge of war and destruction in Syria, as they fled, fearing for their lives, to Jordan after their city was destroyed in Syria. Mustafa was stressed because he felt that his future might be lost and that his dream of entering university might vanish. Hope was revived for Mustafa's life after accepting their request to move to America.

Mustafa is an ambitious and hardworking person who has moved to America to study in American schools and universities which held a high reputation for good education. He was very happy and excited when he started studying. Mustafa loved the American culture and immersed himself in it and made a variety of friends, as he participated in local celebrations and festivals and did various community volunteer work. Mustafa respects all people from different backgrounds, origins, and religions. He has strong relations with his teachers and friends in the school based on love and respect. Mustafa brings gifts to his teachers and friends and participates in their birthdays and celebrations. Mustafa visits his friends, even if they are in another city, to maintain his good relationship with them, and he does not hesitate to offer any help to any of his friends. Mustafa loves and respects American society very much because he arrived with his family in America as a college student, and they were telling me that they were treated humanely, at a high level, in all aspects of society. He said that American society treated them respectfully, with sympathy and love.

Dear Judge Horan, look at this with sympathy for Mustafa, as his family in various parts of the world is going through difficult psychological conditions, anxiety, and great tension as a result of what happened with Mustafa. Mustafa is a young man in the prime of life, and we ask you to give him a new chance in life we are sure that your justice and humanity will change the course of Mustafa and his family's life for the better. Thank you and we hope that you will bring happiness once more into the life of Mustafa and his family.

Sincerely,

Rania Muhammad Al-Nuaimi

Dear judge Horan,

My name is Ismael fares, I am 22 years old, I live with my mother and brothers in Texas. I came to the US in 2016 as a refugee and I have got my US citizenship two months ago.

I am writing you this letter to tell you about my relationship with Alowemer family and especially Mustafa.

I grew up in Daraa Syria where I lived with my mother after my dad passed away. In that city and in the same neighborhood Alowemer family was living, and they were the closest neighbors to us. My mom used to visit them every single day, and they used to do the same thing. I used to go to the same school with Mustafa and after school we would play soccer together in our shared street. Also when my mom visited them I would always be with her, I loved spending time in Mustafa's house.

After the civil war started, we moved to Jordan and a couple months later Mustafa's family moved too and luckily for all of us we lived close to each other. Then we moved to the US and still we are in the same place and still close to each other.

Your honor, I know Mustafa since we were very young, and I want to tell you that to me he is nothing but a nice and good person. He used to help me a lot when I used to get bullied at school and when we used to play in the neighborhood because I was not from the same city, he used to always be by my side, and when kids didn't allow me to play with them, he would ask me to play with him. In school he was very respectful, and different than other kids, he did not skip classes or run around.

Mustafa lived with his parents and grandmother, I remember when his grandmother used to call him he would run to her to help her, she used to wake up early in the morning and Mustafa was the first to wake up between his brother, so he was always sitting next to his grandmother.

After the war and when we moved to Jordan Mustafa started working to help his injured father and to take care of his mother and siblings, he was very responsible. I remember seeing him at his work in Jordan, it was very hard work compared to his age at the time, but he was always working hard without saying a word. Mustafa went through a lot of hardships but he was always hoping for the best to come. After both of our families moved to the US, he was very happy especially that he went back to school, I was so proud of him that he graduated high school with honor roll, we took a lot of pictures in his graduation ceremony.

Your Honor, what Mustafa did is wrong, and he acknowledge that, he told me that he was wrong and he is really hoping to come back to his family and life. He is working hard inside the jail and helping many people there, because he really wants to become a better person.

I ask your Honor to look at him with mercy and give him the chance he need, he really deserve a chance. Please look at him and his family with mercy and leniency, they all suffered a lot after they got separated.

We all deserve a second chance and I am very sure that Mustafa will use his chance very well to serve the community and to help his family who needs him more than anything.

Sincerely,

Ismael Fares

Honorable Judge Horan,

Greetings to you. I would like to write to you all that I know about Mustafa Musab Al-Awaimer in all sincerity and honesty. My name is Omar Abdel Karim Al-Awaimer, born on [REDACTED] and I currently reside in Germany. I am Mustafa's uncle. Fatima Abd al-Karim al-Awaimer, the mother of Mustafa, is my older sister and is like a second mother figure in my life. After Fatima married Musab Muhammad Al-Awaimer, I was 15 years old at the time. I spent most of my time with her, so much, I that I would forget that she was my sister.

I felt like she was my mother. When Mustafa was born, I was very attached to him from his early childhood until he became a young man, and his family depended on him in all matters. I didn't feel that I was his uncle as much as I felt that he was my brother. Mustafa was raised on virtue and good manners, and I do not remember that he ever spoke or did anything offensive and was watching his actions with great awareness. To state some of these good moral situations for him: In the summer of 2003, in a desert area in the town of Nasib, on the Jordan border, we were together on a bike. There were fireworks and it was very hot. We saw a dog that almost died of thirst, in a place where there is no water. I did not dare to approach him for fear because he was fierce. Mustafa ventured to catch him and brought him home to give him water and raised him. Moreover, another situation I want to mention about Mustafa is at the beginning of the events in Syria and amid the siege that was imposed in the year 2012, Mustafa was making sure that he was able to deliver food and medicine to besieged children, even if it put his life at risk. Mustafa was one of the kindest of hearts and he did not harm anyone. He even once told me to watch out, when we were walking. He said, "uncle, there is a house of ants, do not trample it with your foot, it is a soul just like us."

When we migrated to Jordan in Zaatari camp, the situation was very tragic. There Mustafa went and volunteered at the Red Crescent Society to help the refugees, while he and his family were also in need. Mustafa was a kind, polite, and moderate young man. My knowledge of Mustafa is by no means superficial. He advocated equality between people. His reputation among the neighbors was very good and he had many friends.

When Mustafa traveled to America, he was never lazy to complete his success, as he excelled in his studies and was never like teenagers, in light of the situation in which the immigrants were living. Mustafa, in every encounter with him, surprised me with his success and the stability of his situation. Mustafa's life currently in prison fully reflects the opposite of what he is accused of, as he is now of good behavior and the highest of morals that he was raised on. I ask you honorable judge to look at this with the eye of mercy, on his situation and ask about his behavior in prison, and if it proves the opposite of what I say, you have the judgment. I hope that the life of this successful young man does not stop between bars. I ask you to forgive him. I am sure that your mercy and justice are the final say, and that Mustafa will be indebted to you for life. How wouldn't he be grateful when it is this country and its people who saved his family from the situation they were in overseas? Your country was able to accept and save them from the suffering of war and accept them in your honorable country. I ask you for mercy and a compassionate look at his situation.

Sincerely,

Omar Abdel Karim Al-Awaimer
(Mustafa's uncle)

Good day, Madam Judge Horan,

Greetings to you. I am Abdullah Al-Awaimer, 31 years old, of Syrian origin, and residing in the Federal Republic of Germany. I am married and have 3 children. I am a nurse. I was in Syria as a teacher and taught there. I am related to Mustafa by kinship and friendship. I am his uncle (mom's brother). I also was one of his teachers in primary school.

He was a calm, well-mannered child, loving to everyone, as long as I knew he was never the cause of a problem. He was obedient to his father and mother and was very popular in his school. Mustafa in his childhood was an example of a moral child, who would be the best example of a respectful child.

Due to the war, we all moved to Jordan, where I worked in a company, and after a while, I spoke with my boss about Mustafa working with me in the same company. Then a boss at work told me to let him come and put him on a work trial to see his skills.

After some time, Mustafa gained the respect of all the employees in the company, including his boss, and after a while, he was promoted.

In 2015 I decided to seek refuge in Germany and the opportunity arose because life became lifeless in Jordan. I spoke to my sister Fatima (Mustafa's mother) about what I decided, and Mustafa stayed with his family in Jordan and I immigrated to Europe. I kept in touch with them almost daily. Mustafa was the main caregiver to his family. He takes care of his younger siblings, mother, and his fathers even though he was young, he was capable of the responsibility that has been placed upon him.

After a while, I received a phone call from Mustafa, he was crying out of joy and said to me, "relief, uncle! Our refugee application has been accepted in the United States of America, and there I will achieve my dreams. I will complete the studies that I missed and I will become a great thing, God willing."

I kept in touch with them day after day, seeing with my own eyes his interest in studying, making friends, and immersing himself in American culture.

Mustafa did not have a childhood because of the war. As a child, I saw him as a man in my eyes, for a situation I do not forget. Like that time that he walked miles on foot so that he could get some bread for his little siblings, mother, and his father. Mustafa is a person worthy of mention, pride, and honor. Every human being on the face of the earth is liable to make mistakes, but the biggest mistake is that a person does not learn from his mistake. Mustafa learned from his mistake. On my behalf and behalf of my family, I ask and plead with you, Your Honor, to have mercy and compassion on Mustafa and give him a new opportunity to build a new life. To save the family, all who have hope and optimism for a better future.

With great respect and appreciation, Abdullah Al-Awaimer

Dear judge Horan,

My name is Mousab Alowemer, I was born [REDACTED] 1975, I work as a food servicer at Compass Group, USA and I am married and have four children, the older of them is Mustafa.

In 2013 my family and I left Syria as a refugee to Jordan because of the danger we were in. I had to leave everything behind me for the safety of my family. At that time, I was injured due to a hit by a Syrian soldier in my leg that made life very hard for me and my family back there. Because of that injury, I did not have a choice but watching my wife and 13 years old son work to make life easier for all of us. Mustafa was a child when he held a huge responsibility because he saw me suffering from my injury. I could not work for so many years after my injury and Mustafa had to keep on carrying on that huge responsibility and taking care of the family after his mom stopped working in Jordan.

Mustafa was very caring and soft hearted that he would do anything to see me and his mother smile, he used to get very sad and get very emotional when his mother and I talk about the hard living that we were going through and tell us that he will work hard to make us happier.

Even though Mustafa tried to not have a day off work, whenever he was home, he would try his best to take the family out to have a good time. He did not stop with taking only our family, he would always invite his grandmother and his cousins to go out with us. His happy time when we all are gathering with laughs all over the place.

In 2016 and after we spent a very long almost 4 years in Jordan, I got a call that my family and I got accepted to enter the USA to start a new life. That call was the happiest news that I heard of since I left Syria. We were very happy that there is finally a hope to actually live happy after losing everything, what made me happier is the way my kids reacted to the call and especially Mustafa. They were so happy that they will be able to go to the same place where their favorite movies characters will be, and they will be able to study in the American high schools that they see on the TV. The question they asked me that most will we be able to be a US citizen, they were jumping with joy when I aimed with my head saying yes.

After we moved, I was very happy that I can work again and carry the responsibility. Mustafa was extremely happy that he was able to go back to school, which was something that he thought was impossible, he went back to living like a normal young man, which made me and his mother very happy. He had a lot of friends from different back grounds and was very easy to fit in with a totally different culture to his own.

When Mustafa was going to turn 21 years old he was supposed to graduate from high school, so he had to finish his 11th and 12th grades in one year, he worked very hard to be able to keep on learning the language, doing his class work and also keeping up with afterschool programs. He used to leave home very early in the morning and come back very late after finishing after school programs. Mustafa worked hard and graduated high school with honor roll.

Your Honor, after living the perfect life that we all dreamed of, Mustafa was arrested. Our life started to fill apart, since that day we have not smiled as we used to. Life became very hard, my and his mom health conditions started to get poor and we were diagnosed with disease that we never thought it will

happen to us. I started seeing my wife cry almost every day, and we all do not go out as we were. Mental health became one major issue that we all go through. Your honor my family and I are like one body if one part is gone or hurt the entire body in discomfort, since we lost Mustafa we all are hurt and we cannot live a normal life.

I ask your honor with all my respect to look at my family with mercy and leniency, and give all of us another chance to live a happy life as we always wished to. I ask your honor to give Mustafa another chance, Mustafa have learned that what he did is wrong. He talk to me every day, and he always tell me that he is very deeply sorry for what he did and want a chance to go back to his normal life, study and work to help our family become happy again.

I am asking your honor to look at him with mercy and give us all a second chance to live happily as we got a chance to come to the US to live safely.

Sincerely,

Mousab Alowemer, Mustafa's father.

To the esteemed Judge Horan,

My greetings to you. I am Fatima Abdul Karim Al-Awaimer, born [REDACTED]. I am married, and I have four children. My family and I immigrated from Syria to Jordan at the beginning of 2013 to escape the war. We stayed in Jordan for about three, then we came to the United States of America in 2016. Since then, I have been in Pittsburgh. I am not currently working due to health conditions, and my relationship with Mustafa is that I am his mother. I have not been away from him for a day, except since he entered prison.

Mustafa for me is the ideal son that you would wish for because he is kind-hearted, loving to everyone, polite and calm, he never made me angry, and he was always very affectionate to me and his father and brothers since his childhood. Mustafa is very calm, loves everyone, and loves to help everyone around him. He never complains about helping anyone who may need help, from the people around him. All family members, relatives, and neighbors love him because he is kind and loves to help everyone who needs help, especially the elderly and children from the family or neighbors. He never liked to see quarrels between people, since he was young, he was always trying to reconcile with his friends during problematic times.

At the beginning of the war, when he was twelve years old, he always helped deliver food, bread, vegetables, and medicine to neighbors and families in need. He always helped me bring vegetables and fruits when his father was injured at the beginning of the war. I remember at the beginning of the war when the schools were closed, life became very difficult and there was no source of livelihood at all. I used to go to work in the fields and gather vegetables despite the dangers of bullets and planes. He used to help me. Mustafa was twelve years old when we left our house in the city and went to the countryside to work in the fields. He used to go with me to support the family, and his grandmother, who also lived with us in the same house because she was handicapped. He would bring food to the family every day and at some point, he asked me not to go work in the fields anymore. He asked me to just stay at home to take care of his father, his grandmother, and siblings. He told me that he would go to work and bring money, and he would. When there was no work, he would go to collect mushrooms from the plains and sell them to people, and he would never come home empty-handed. He was an example of a good son.

After we immigrated to Jordan, the situation changed a little as we no longer dealt with the danger of planes and missiles. He started taking care of me, his father, and his siblings by providing everything we needed from the market. He took care of his siblings by taking them to school by walking. He was not able to attend school because he had to help with the house, and work. We all got lucky, and we all smiled when they asked us: Do you want to travel to the United States? We were very happy, especially Mustafa when he heard about the kindness of people and the safety in the US. Since his childhood, the kids have loved the United States and watched American movies and series. When we came here, he was the happiest person in my family because he was accepted into the school and returned to the education system, and started studying. That first day at school was unforgettable, because of how happy I was that was returning to school to complete his studies, which he was deprived of in Syria and Jordan.

He made many friendships quickly with other young boys and girls his age. He always participated in the celebrations that were held in school and outside school. He went to many of his friends' birthdays, and he brought in many gifts to his school friends. He liked to go on trips with his friends inside and outside the school. He loved everyone and everyone loved him back. He was very interested in his studies. He

completed his high school intensively in three years and graduated with honors because he was very interested in his studies.

He took care of all those around him from family, neighbors, and friends, by transporting their children in his own car, to and from school daily. We had an old neighbor, that Mustafa would always go and reassure her and her daughter. He always brought them what they needed. When he found a neighbor in the city center of our neighborhood, he would drive them to their homes.

Mustafa is a nice and kind-hearted person. I can not forget that day, October 16, 2018, when I fell and fainted in my house that day, I did not realize what happened to me, and after I regained consciousness, I screamed and the first person who saw me was Mustafa, who was crying and called the ambulance, and stayed with me in the hospital. That day, I broke my nose, and was crying when he saw me, and he was wiping the blood off my face and telling me: Don't be afraid, mom, you're fine. He took care of me until I got better. He did all the housework until my health improved.

Not only did he help at this time. However, throughout his life, he was doing this to help the family and everyone. Many difficulties have passed through Mustafa's life since the beginning of the war. He did not show this struggle in-front of us, for the sake of the family's happiness and for fear of his injured father's feelings. He sacrificed many things for the happiness of everyone around him, especially his disabled grandmother and his injured father. He was never stingy with offering help to anyone and everyone whom he sees and asks him for help. He was an example of a good son and an ambitious young man. He always told me, "what's to come, is more beautiful, God willing."

Our lives were turned upside down after what happened to Mustafa because he was the source of happiness for the family. He was the most helpful person, who felt on his own what we needed before we asked him for anything. He was like a candle that burns itself to light those around it.

Dear Judge Horan,

I ask you for mercy, kindness, and forgiveness for Mustafa because he deserves a second chance. I say this while I am confident in your justice and I hope you look at this with mercy for all the compelling circumstances and deprivation Mustafa went through during his childhood.

What happened to Mustafa made our life much worse than what we were living in, when we were in Syria. My family and I, have been greatly affected. We have not felt happy for one day, since Mustafa was arrested, and there does not come a day without the crying and sadness.

Mustafa has changed in prison and has become aware of the mistake he made, and the evidence for this is that he helps everyone around him in prison, and helping this is not new to him. He makes mistakes and continues to make mistakes, but he learns from them.

Your Honor,

please have mercy on Mustafa and forgive him for his mistake because he realized that what he did was a big mistake. Please forgive him because he is still in the beginning of his life and deserves a new chance. Please forgive him for the sake of my family and I, because we are good people and we need to live in the peace, security and happiness that we came looking for in this country. This is what we entrusted with in this country, that my family and I aspire to be a part of, and one of the most loyal people to this country. A country that welcomed and embraced us.

With my utmost respect and sincerity to you, Fatima Abdel Karim Al-Awaimer.

Dear judge Horan,

Thank you for allowing me the opportunity to write you this letter. My name is Shahid Alowemer, I am a CCAC graduate and a junior at the University of Pittsburgh, I have been living here in Pittsburgh since August 2016 when I first came to the United States. I love Pittsburgh and I found it to be the perfect place to work on myself, and to start a new life.

I am the only girl between a very handsome three brothers, the older of them is Mustafa. I did not have many friends around me, but my brothers fulfilled my life with everything I needed. I am very close to all of them and was very spoiled by Mustafa. I believe Mustafa does not see me as a grown young lady, because every birthday of mine he gets me a bear, and as I grow up the size of the bear grows with me. Mustafa is the one who always takes care of me, especially when I am feeling down or stressed. Since I became a resident in Pittsburgh, I dreamed of becoming a student in the University of Pittsburgh, thankfully I got accepted and the first thing that Mustafa told me is "wait till I get out of jail and I will not let you pay for anything, you study and I will pay your tuition" his words to me made me feel like I am safe, because I got a big brother to take care of me no matter what.

Mustafa and I don't have a big age gap between us and so I am very close to him. Your Honor, Mustafa suffered a lot and went through hard times, but he never showed it to anyone. He was very caring and always wanted my parents to be happy and not worried about anything. He was very respectful and sweet; he would always encourage me and my mother to smile more saying "smile people around us are nice"

Mustafa was a big fan of the mother nature, he loves camping and love to swim, whenever I am feeling down and stressed from studying, he would come to my room close my laptop and take me out saying "I found a beautiful place lets go breath a little bit, finish studying when we come back", he tried to teach me how to swim but I am a lazy person.

Mustafa did much more than what I did for him, he always wanted me to be smiling and happy, but I was not able to get him out of his hard times. He suffered a lot with his small body in Jordan when he used to work very hard to help my dad, I remember one day he came from work to the basement that we were living in saying nothing but not being able to control his tears, when we rushed to see him he said that he was not able to move his back but he is ok, after that we found out that he has held something very heavy and got his back muscle teared. I remember his face that day, it brock my heart. After that accident he took the second day off but went back to work the day after, he refused to take any other day.

After we came to the US, Mustafa thought that he cannot go back to school because he missed a couple years, but when I started my first day and saw many students who were his age and older I told him and told my parents, he was very happy that I will never forget the smile on his face. He went back to school and got his diploma in 3 years with an honor roll. He also was happy to be in college, we both took ENG 101 at Carlow University during the summer of 2018, it was one of the best years ever, I was a bit jealous that he had a lot of friends and when people talked to me was because I am "his sister", we used to laugh a lot about it. when I was still at CCAC I took him in a tour to show him the campus, he loved it and applied and after he got accepted I helped him with applying for Federal Student Aid FAFSA, we could not finish what we started because he got arrested.

After our family have reached the peaceful life that we ever dreamed of, Mustafa got arrested. We the entire family have never been so broken like that day. Your Honor, I saw my parents loosing their health day after day, they looked much younger before Mustafa got arrested. I started seeing my mom crying every day and sometimes when she did not want us to worry about her, we would know that she cried because of the mountain of napkins next to her head. My dad has some heart issues but before it was not bad, now and after Mustafa arrestation he takes his emergency under tongue pill almost every day. And since I am the oldest sister at home now, I know the huge responsibility that Mustafa was holding.

Your Honor, all I want is my family to be happy and we all cannot be without Mustafa between us. What he did was a huge mistake, and the first step to correcting the mistake is to acknowledge it. Mustafa acknowledges and know that what he did is wrong, and he is willing to make up for it. please your Honor look at him with leniency and give him a chance. Please look at him and my entire family with mercy, it is something we all need.

I ask your honor to please be merciful with Mustafa, him being away from us is a huge burden that I am afraid we will not be able to handle. We have lost a lot of loved ones to our hearts, please give us a chance to live a happy life all together.

Thank you so much for your time,

Sincerely,

Shahid Alowemer

Honorable Judge Horan,

My name is Mahmoud Fares, born on [REDACTED]. I live with my mother and brothers. I am married and I have a son, and I work in the field of solar energy. My family and I have been living in Texas since September 2020. Before that, we had been in Pennsylvania for two and a half years.

We have had a strong and ancient relationship with Mustafa Al-Awaimer's family since we were young, as we were neighbors in the city of Daraa, in Syria. I knew Mustafa when he was about four years old. Mustafa was kind, calm, and loving to everyone. He used to play with my younger brothers, and they went to school together. He was one of the most loved children due to his good manners, his character, and good upbringing.

Mustafa has good morals and was raised with good ethics. He helped those who needed help from the people around him. He did not like to see any of his friends sad and tried to create an atmosphere of kindness and love among them. After the war began in Syria, our family and Mustafa's family migrated to Jordan in search of security and peace, yet we remained neighbors.

After that, everyone's life changed for the worse after we became refugees. Most of the children were deprived of schools, and Mustafa was one of them. He was deprived of his childhood and his studies. He did not go to school, because he had to help his father, he worked and helped his mother as well.

Many families received calls to travel outside Jordan and my family as well as Mustafa's family were among the lucky ones. Mustafa's family never hesitated to travel, and they were very happy. In Jordan, Mustafa's family was tired and suffered a lot, so they were among the happiest people to leave for the United States. Mustafa was very happy that they will have many opportunities there, and one of the most important of these opportunities is to study and live in safety.

Mustafa and his brothers came back to school and they were the happiest. When I talked to Mustafa about his return to school, he told me that he is very happy and he studies hard. He told me that he has many friends in school and that he loves culture. He told me that his school is interested in showing cultures to all the different students in his school. That they show different cultures and hold celebrations every year.

My family moved to live near Mustafa's family and we needed help in moving the furniture, but Mustafa did not delay to offer assistance and moving the items with us. Mustafa was a very funny person and liked to laugh and tell a lot of jokes, and he liked trips and spending fun times. Despite all the difficulties that Mustafa went through, he loved to have fun and was looking forward to living a happy life with his family around him.

Your Honor, I do not know the reasons that prompted Mustafa to do what he did, but I am sure that Mustafa is a good, decent, and loving person who deserves to be given another chance. Your honor, I wish and ask you to pardon and have mercy on this young man who deserves to be pardoned, because this incident affected him and his entire family, especially his parents and younger brothers who were very attached to him.

I talk to Mustafa from time to time while he is in prison, he has changed and has become mature and aware of the mistake he committed. Mustafa wants a new chance to live in peace and without any mistakes, and he wants to help his family, who have not felt any meaning of happiness since this incident.

He is now in prison and loves to help everyone, and he volunteers to help as well.

Your Honor, I ask your justice to look at this with mercy and pardon this young man for his future, who came looking for, and sympathy for the heart of his mother and his family, because they deserve it.

With all due respect and appreciation for your justice,
Mahmoud Fares

Honorable Judge Horan,

Greetings to you. I want to write to you all that I know about Mustafa Al-Awaimer, in all honesty, and integrity. My name is Najah Aqla Al-Awaimer. I currently reside in Germany, and I am the wife of his uncle. The father of Mustafa would be my cousin. I spent beautiful and unforgettable days with them in Syria and Jordan.

I remember Mustafa was a human being with the utmost respect, admiration, and love for everyone. When I gave birth to my son, I remember Mustafa was very happy and he was always wanting to carry my son when I was tired. Mustafa's mother relies on him a lot because he is trusted and used to help people, by providing medicines for them when they were trapped. All I know is that he was a loyal and ambitious person. I used to communicate with them when they traveled to America, and I heard the news from him through his mother that he was successful, and his sister Shahad was well, in their studies. I was told he learned the language quickly. I know that in general he is a nice and lovable person and respects the young and the old.

In Jordan, voluntary work was also done by Mustafa to help refugees, especially the elderly, because the situation there was tragic. In the camp, he was carrying gas cylinders in a cart and delivered them to them in front of the caravans. Also, in the Zaatari camp, there is difficulty in transporting water. He used to carry water in a bucket and deliver it to its owners, and he was also against war and destruction, and he sometimes cried because of situations that happened in his country. When a problem occurred between his friends quickly finds a solution to it and reconciles them. He was a friendly person who does not like problems. I consider Mustafa a successful person who was not lazy about doing good, despite his young age. When I spoke with his mother and heard the news that he excelled, I was very happy because he is persistent and loves to study. In a short period, he obtained his high school diploma with honors. I have a picture of him holding a bouquet of roses and wearing the official graduation suit on the day of receiving his high school diploma. I am proud of him to this day. When I last spoke to his mother, she told me that Mustafa had a call in prison that he wanted to use to talk to his family, but he donated it instead to a friend who was short on call minutes in jail, to help him talk to his family.

I was surprised by the incident that happened with him and I could not believe that Mustafa would do such a thing, but I contact his mother and she tells me that his life now in prison is radically different from before, he has good behavior, morals, respect and is friendly in prison as well.

I ask you to look with compassion and mercy at his situation and that of his mother, which hardly passes a day without crying over him. His attributes

Inside prison indicates the top of his morals and reflects his upbringing, and if my words are the opposite of what I speak, you judge. Mustafa is a successful person who deserves a second chance, and I am sure that in the land of justice no one is wronged. Mustafa and his family will be indebted to you for life because you are the ones who helped his family get out of the suffering of war and hosted them in your honorable country. Finally, I ask you to consider his situation with an eye of mercy.

With all due respect,

Najah Aqla Al-Awaimer (cousin of Mustafa's father and mother, and his uncle's wife.)

To the honorable Judge Horan,

Greetings to you.

I am Ibrahim bin Abdul Karim Al-Awaimer, born on [REDACTED], married and I have six children, four sons, and two daughters. I work in the field of animal care, and I live in Daraa, Syria.

I am Mustafa's uncle, his mother's eldest brother, and I saw Mustafa and my two sons grow up together in front of my eyes. I remember when Mustafa was in Syria before he emigrated with his family to Jordan because of the war. Since he was a small child, he is known for his good manners and his rare and wonderful upbringing, because he was raised with noble manners. He is known for his kindness of heart and love of helping others, even though he was a young child. He and his siblings were brought up with a good upbringing, and all the neighbors and relatives testify to this even after they emigrated to Jordan. Circumstances did not allow Mustafa to study in Jordan because he was helping his injured father and mother in raising his siblings/younger children, even though he was thirteen and a half years old. Luckily they were accepted as refugees in the United States and Mustafa was very happy along with all of his family. Mustafa jumped from joy to travel to the United States for a better life and to complete his studies, which he lost in Syria and Jordan. After they arrived in America, I always heard the great news about them that would make me happy, because he and his siblings went to school and their lives changed for the better. Soon they formed friends at school, and he told me all about his friends and his new neighbors that he was happy about.

He always told us about his relationships with his friends. He liked the teachers at school, and he had a good relationship with all the people around him. He is a person who was loved by all because he was very kind and helpful to adults and children. I remember a situation that I will never forget, being Mustafa's uncle, when the war separated me from my sons and daughters who migrated to Arab countries that are next to me in Syria, like Lebanon. Mustafa was always there helping me when I was alone and when I needed help. He was taking care of me when all my children migrated. He took care of me when I was sick and covered me and helped me to bed when I was not feeling well. He also used to prepare food for me when I wasn't able to.

Madam Judge, Mustafa is very nice and deserves a second chance. Give him a new chance for a better life. I ask the justice system in regards to this case, to look at it with compassion and kindness. Mustafa and his family deserve another chance. He changed a lot for the better in prison.

You have all our appreciation and respect, Ibrahim bin Abdul Karim Al-Awaimer

Honorable Judge Horan,

My greetings to you. I am Najwa Ahmed Al-Masry, I am married and have three children. I am 47 years old and I live in Jordan. Mustafa and his family have been our neighbors for four years, and we have seen nothing but good from them. They came from Syria because of the war in their country, and they were stressed because they felt that their future was lost, and hope was renewed after their acceptance in the United States of America. Mustafa and his family were the best neighbors. Mustafa's parents raised him and his siblings well.

Mustafa was shy, polite, and one of the best young men in the neighborhood. He was merciful to children and helpful to adults. He was a person who did not hesitate to help anyone.

I asked him once to help me. I had built a room in my house and I need help, and he was not hesitant to help me. Mustafa was known for his politeness and respect for others. He was very happy because he would move to America to build his future and complete his education.

He and his family contacted us after they moved to America and they were so happy and reassured, that I wished I had the opportunity to move to America. They told us about the humane treatment they received in American society, that they form relationships, studied, and how happy they are with their life in America.

I trust the wisdom, sympathy, and mercy of the American judiciary to give Mustafa another chance after all the circumstances he and his family went through. We hope that you will look into his matter and return the feeling of happiness and reassurance into the heart of him and his family, who moved to America to search for these feelings.

We trust in your justice and wise call.

With all due respect,
Najwa Ahmed Al-Masry

Dear judge Horan..

My name is Ahmed Mohammed, I'm 21 years old, I have 5 siblings.

I know Mustafa from school, we went high school together and we graduated in the same year, We used to have some class together, I used to see him almost every day in school, we used to play soccer together too.

He was playful guy that make a lot of jokes. He was a hard-working guy. He was kind, and helpful, since we lived in the same area there was a few times that he gave me a ride to school. I remember a time he told me how happy he was to be here in the United States. We used to go out all the time, he liked to make new friend.

He was hard worker student he was not a trouble maker in the class at all, and was very respectful to the teachers.

I know for sure Mustafa and his family had and and still have a hard time after he want to jail, and I feel so bad for them. I hope your honor understand and show some Mercy to Mustafa and his family, he is a well-mannered gentleman, and I am sure he learned from his mistake. I ask your honor to give him and his family a chance.

Sincerely,

Ahmed Mohammed

Honorable Judge Horan,

I am Mrs. Nasreen Khalil Al-Loubani, married and have 4 children. I am 46 years old, from Jordan. Mustafa and his family have been our neighbors for 4 years, and they were some of the best, most loyal, and cleanest people around. He came to Jordan because of the situation in their country. We got to know Mustafa, and he was one of the nicest people to deal with. Anything I would ask for, he does not reject it, even if it is his responsibility, because this is from his kindness and generosity.

One day Mustafa and his family accepted the offer to go to America. They felt joy and happiness. They had great hopes that going to America would improve their standard of living and build a new life for themselves. They hoped that going there would provide them with sufficient schooling to complete their education.

They went to America and we kept in touch with him and his family. Indeed, Mustafa completed his education and became an educated person. They had new friends and established public relations with everyone. He would say, "America became my country, and I felt reassured here, after what I saw of fear and fatigue in my country, Syria."

This incident affected the life of Mustafa and his family from a psychological and health point of view, and Mustafa realized that what he had done was wrong, and this brought grief to his heart and his family.

I am 100% sure of the amount of sympathy you will give to Mustafa because this is what we heard from Mustafa and his family about the kindness and compassion of the American people.

I hope that you will have as much sympathy as you can for Mr. Mustafa and that you will see into consideration to what he went through in the past. I hope you will give him a chance for the life of this young man and the lives of his family who went to your country to rest and be reassured. I am sure of the amount of justice that you will render to Mustafa.

With all due respect,
Nasreen Khalil Al-Loubani

October 24, 2022

The Honorable Marilyn J. Horan, District Judge
US Courthouse
700 Grant Street
Pittsburgh, PA 15219

Re: Mustafa Alowemer's sentencing

Your Honor:

I am writing to you to request leniency on behalf of Mustafa Alowemer, one of my former students. I taught Mustafa for two years, from 2017-2019, when he then graduated from PPS Brashear High School. Mustafa came to us with limited transcripts as he had stopped his schooling in Syria and worked to support his family. He pushed himself to finish high school before he aged out. His second year with me he was taking junior and senior classes at the same time, both during the traditional school day and after school as well. In order to do this, he had to quit participating in our auto tech/body magnet program, which was his dream to participate in, but he wanted to graduate from high school and that's what he needed to do.

Mustafa is one of the hardest working people I have ever met. He pushed himself while also being an exceedingly nice and kind person. Without Mustafa's help, there are three of his former classmates that would not have graduated. He assisted them daily in English class. He helped bridge their gap of understanding and my gap in being able to explain to them what they needed to do to graduate. I have a picture of the four of them on their graduation day. It is one of my favorite pictures. All three of these students, who were not friends or relatives from Syria, greatly benefited from their knowing Mustafa. He would watch me or his other English teacher, try to explain to them what needed to be done, and them either try or give up because they were confused. He would then stop his own work and patiently explain to them in his quiet voice what we were saying to them. He would help them form the words and sentences we could not. I hear from two of them still and they are doing well, pushing themselves to have good jobs and to become US citizens. Without Mustafa they would not have graduated in the traditional way and probably did not have enough schooling and English to pass classes using a credit recovery program.

Mustafa was a constant quiet presence in my first two years at Brashear. He participated in a field trip that I helped supervise and the photos of him looking at the exhibits and listening intently to the docent at the Carnegie Museum of Natural History show his desire to learn and better himself. Towards the end of our time together, he brought me a piece of artwork he bought and carried on the bus to school for me. He knew my love of sharks and Star Wars and saw a large sign saying "Join the Shark Side". He just quietly handed it to me, thanking me for teaching him the past two years. It is still in my classroom and will remain there for the remainder of my teaching career.

I have seen so much good in Mustafa. I know it is still there. It is ingrained in him. I ask you to please see the good that is there and the good he can continue to do in the world when you sentence him for these crimes. He is able to return to being a productive conscience member of our society. His family needs him but so do the rest of us. Please consider this when you sentence him next month. If you or your staff have any questions I am available at your convenience. Thank you very much for your time and consideration of my request. It is greatly appreciated.

Sincerely,



Anne Meade

Hello Judge Horan,

I hope that this letter finds you in a state of good health and well-being. My name is Asiya Uwimana, I am 23 years old. I got married last summer of 2021 and was gifted with a beautiful stepson, and now living with my family. 2 months prior to getting married, I graduated from Carlow University with a degree in Bachelor of Science in Nursing. I was working as a Patient Care Technician (like a nurse's aide) at UPMC Presbyterian for 2 years, before graduating as a nurse. I decided to stay at Presbyterian and start my nursing journey there. As a nurse, I worked on a Neuro-trauma floor at Presbyterian for 8 months, before transferring to Magee Woman's hospital at the end of March of 2022. I am now working at Magee Women's Hospital and take care of patients who are Covid+, along with other general medicine patients. I love being a nurse and could not be happier with the role I play in people's recovery and return to a normal life after being ill.

I met Mustafa and his sister Shahid when we were at Brashear High School. Brashear High School had the English as a Second Language (ESL) program, and many of non-speaking students were enrolled at Brashear. At Brashear, I started a Diversity Club for students of diverse backgrounds and wanted to help all students who were from diverse backgrounds come together and learn from one another. I was always interested in new students and helping them adjust to the school. Especially students that I knew were new to the United States. I especially made more effort to speak to them and help them feel welcome. I too am a refugee, whose family fled many wars and genocides. Therefore, with everything that I learned about Syria and those who were fleeing for a better life, I wanted to speak to Syrian refugees who were attending Brashear high school and help them adjust. I saw Mustafa and Shahid many times in the hallway, and we also met in our teacher's class for the Diversity Club to organize events and gatherings. Diversity Club meeting were at lunch time and sometimes after school. Mustafa and Shahid's family moved to Northview Heights, where I was also living at the time, and I also used to see them there. Their mother is a wonderful woman, and she would invite my neighbors and I over to her home to visit her. She would make us tea and treat use well with delicious pastries.

When I first met Mustafa, I first noticed the kindness in his eyes. He smiled at me and greeted me, despite not speaking English fluently. I have always known him to be respectful. He treated his teachers with gentleness and respect. He engaged in class discussions and made his

teachers happy. I came to the United States when I was 9 years old and was no longer enrolled in the ESL program, about 4 years prior to meeting Mustafa. I used to go to the ESL classes during my free class and tutor some of the students and help them with their class assignments or homework. Mustafa was the kind of person that protected the other girls and stood up for what was right. I remember one time in one of the classes, the other students were making fun of one of the Nepali students who did not understand the assignment and was answering incorrectly. Every time the student read the answers, they would laugh at her. Majority of those that would start making fun of her were some of Mustafa's friends. Mustafa told them to stop and reminded them that they were also in her shoes once. I really admired that because despite everyone else in the class finding the situation funny and laughing at the girl, Mustafa saw that it was wrong and stood up for her. I am also glad that ever since that incident, I did not witness any of the student's making fun of another in class.

Mustafa has been through a traumatic experience since he was incredibly young. He witnessed multiple death, and injury and people being displaced and losing their homes. Mustafa has lost family members from the attacks in Syria. He witnessed horrific things that any child should never have to witness. As a person who experienced trauma of brutality from wars and genocides, I know how hard and almost impossible to cope with such experience. However, unlike Mustafa, I did not experience first-hand any murders being committed in front of me, or seeing people killed in front of me. Thankfully for me, my parents shielded me the best that they could have, and my trauma is from the aftermath and what I learned from those around me. Also, being so young, I was able to dissociate from some memories and somehow managed to make block many of my traumatic encounters. My family was also accepted to seek refuge in the United States when I was 9 years old, which helped to avoid more traumatic experiences. With people like Mustafa who grew up around such horrific events, and then witness it at young adolescent years, it is extremely hard to cope with such experience and can not as easily dissociate from the memory, like I did when I was younger. Witnessing murder hunts people and remains on people's consciousness for years. Especially a teenager, and especially multiple assaults. That kind of trauma unfortunately leads to young adults making terrible decisions.

This experience has been difficult for Mustafa and his family. I was with Mustafa's family on the first court hearing and his mother was in distress. When people learned about the

charges, Mustafa's family was faced with many harassments. People in Northview heights were targeting the family and vandalizing their home. Mustafa's family had to stay at a friend's house for day. They later had to stay in a different house for weeks. Mustafa was regretful for putting his family through such a challenging time. He is regretful for his actions in general and is apologetic to all people that he has hurt in many ways. He wishes to go back home and help his father take care of their family. His father and siblings are working to help make ends meet, and Mustafa wants to help them. He wants to rebuild his family's relationship and live their lives together again as a family.

Judge Horan, I would like to ask you for leniency. Please have mercy on Mustafa Alowemer and allow him to go back to his family. He understands the extent of his behavior and how serious his situation is. He longs for forgiveness from all of those that he has hurt. Allow him to make amends. Allow him to go work on being a better person. Allow him to try and make things right. Please have mercy on him and allow him to return to his family.

Best wishes,

Asiya Uwimana

To the esteemed Judge Horan,

Greetings to you. I am Faisal Adeeb Al- Awama, born on [REDACTED]. I finished my high school studies in 2020 and I have been working in Ali Baba Restaurant for about five years now. I am a close friend of Mustafa and his family since their first day in the United States, because we lived in one neighborhood and we had been going to the same school since the beginning of 8/2016.

Shortly after the arrival of Mustafa and his family, Mustafa became my close friend, because I found him a good and respectful person. He and I spent the most beautiful days and moments in school and outside the school. Everyone testifies to Mustafa's good morals because he is a good person and loves everyone, and loves to help everyone. I have never seen any bad behavior from him.

Mustafa and I worked to assist the Al-Ansar Association to help refugees from the affected countries. We worked together late at night, even though we were attending school. Mustafa was also helping the neighbors to drop off and take their children to school in his own car because we were in the same school. When Mustafa came to the United States of America, he did not speak English, but he persevered in his studies intensively and graduated within three years with honors. He was one of the best students in the school as perceived by all our teachers. He made many friendships with students from different countries and cultures. He immersed himself in the community easily because he was telling me about his love for America and how he loved it even before he came here. He was happy and proud of himself because he completed his studies, which he could not complete in his country. He did not like to see someone sad, because he was creating an atmosphere of joy by being funny and joking. He loved helping the needy because he always carried snacks in his car for the needy every time we went out together.

I spoke with Mustafa several times on the phone while he was in prison, and he was telling me how much he regretted what he had done. He has changed a lot for the better. He helps the needy prisoners around him. He also does voluntary work inside the prison, like when the prisoners around him get sick, he takes care of them.

Madame Judge, I hope your justice will look at this with mercy and forgiveness on Mustafa, because he deserves to be given a second chance because of what he went through in Syria and Jordan. Also, the loss of most of his family members and close friends. This incident affected his family a lot as well. I also ask you to look with compassion towards his family, who suffered a lot and is still suffering from the beginning of the war in Syria and whose suffering increased because of Mustafa's distance from them. I ask you to give them a second chance to live happily with Mustafa.

You have my sincere thanks and appreciation,

Faisal Adeeb Al-Awamah

MERCY AND COMPASSION

Date: June 15, 2022

Dear Honorable Judge Horan,

My name is Wiam Younes, a U.S. citizen and a resident of Pennsylvania since 1999. As the Executive Director of Ansar of Pittsburgh, a non-profit organization, has been working since 2016 with refugees and immigrants. In 2016, I met the AIOweimer family arriving in Allegheny County from Jordan through their resettlement agency Northern Area Multi-Services (NAMS). At that time, the family was living in the north hills.

Mustafa, the eldest child, was pleased to be in the United States. He loved his school and his classmates. Whenever I visited the family, he welcomed me with a smile and eagerness to help.

Once, Mustafa shared with me that he was so happy to be in the United States as he felt respected. His life in Jordan, as he narrated, was difficult. He couldn't attend school because he was a refugee and needed to work to support his family. Jobs for Syrian refugees in Jordan were scarce and, if found, paid a meager salary. Mustafa didn't live an average pre-teen and teen life. He was handed responsibilities as a child. Although deprived of a typical tween and teen life, he never lost hope and perseverance to succeed in his studies.

Mustafa attended high school as a full-time student and worked part-time to support himself and help with family expenses. He was the rock his mother, father, and siblings leaned on for emotional support. In the refugee community, he was loved and respected. He avoided conflict and worked to resolve issues among friends. Mustafa accepted people as they are no matter where they come from or what religious background they represented.

In 2018, I took a group of Syrian refugee youth on a trip to Ohio Pile for water rafting. Mustafa and his sister joined us. For the first time, I saw him as a young man having the thrill of his life. The responsibilities he carried heavily on his shoulder dissolved for two hours. He was extremely appreciative to experiencing such fun without feeling guilty about not working. Refugee children are handed responsibilities way above their age. They are guardians of their parents, without the right to make decisions, because they learn English much quicker than their parents and assimilate faster in the society.

Mentioning the above, you can't imagine my shock and surprise to learn about the alleged plot he was accused of. I am not the only one shocked. All the Syrian refugee community couldn't believe it. No one saw it coming, and no one can comprehend the allegation to this date.

Approximately 18 months ago, I was visiting the AIOweimer family to check on their well-being. While visiting, Mustafa called from jail. When he learned, I was visiting, he asked to speak to me. Mustafa asked about the Syrian refugee community progress and who is helping ANSAR move donated items to needy families. Then he promised to assist as a volunteer the day he is out of jail. The rush to assist those in need is the natural characteristic of the young man I knew.

You may think me naïve or misinformed to write this letter asking to view Mustafa as a young man who lost his way for a short time. To work with refugees, one needs to see the goodness in every individual. Therefore, **I ask for mercy and compassion.** I believe Mustafa can serve the country by warning other Muslim and refugee youth from falling for evil propaganda. No one can tell his story more effectively than Mustafa himself. I honestly think, Mustafa can and will want to protect refugee youth from falling for misguided messages from evil groups. Please give him a chance to prove it.

Sincerely,

A handwritten signature in black ink that reads "Wiam Younes". The signature is written in a cursive, flowing style.

Dr. Wiam Younes

CEO Ansar of Pittsburgh



Carnegie, PA. 15106

Tel: (412) 969-8067

Dear Judge Horan,

Greetings to you. I am writing to you, with all that I know about Mustafa Musab Al-Awaimer. My name is Alaa, I am 21, born in 2001. Mustafa was my friend at school. I met Mustafa Musab Al-Awaimer at school in 2016. I also got to know Mustafa Al-Awaimer's family in 2016 through the organization that brought us to the United States.

Mustafa was a good friend with high morals and politeness. Mustafa was a good and ambitious person who loved to study. He was a person who loved to joke and laugh and was a positive person with his friends. Mustafa's life got better when he moved to America. He started studying and learning the English language. During the summer of 2018, we were studying English at Carlow University together. Mustafa was one of the special people among the teachers and students. He had many friends and acquaintances in college. He always liked to make new friends and learn new things about other cultures. Mustafa was a nice person and sometimes he helped me get home from university. He was also helping me with the English language and studying.

I spoke with Mustafa several times over the phone, and he told me that he regretted what he did. I would like to ask your justice to have mercy on Mustafa for the sake of his family and his future life.

Thank you all for that hard work,

Alaa Al-Awamah

Judge Horan,

Regards to you. My name is Alaa Fares. I live in Dallas Texas. I am 23 years old. I studied at a high school and graduated, and now I work in the field of solar panels. I am Mustafa's friend since childhood, he used to live near my house.

I moved to the United States to Chicago with my family about 6 or 7 years ago, and then I moved to Pennsylvania next to my friend Mustafa's house.

We spent a lot of good times together fishing, playing football, and going swimming together. We were also getting to know the city more, going to the parks, and exploring, until the painful incident happened with my friend Mustafa.

Mustafa is an ambitious and intelligent person, he was very interested in his studies. Everyone in the school loved him because he was smart and kind. He helped his friends with homework and was obsessed with learning about the city's culture and landmarks. He was interested in making friends with others at school. Mustafa has moved to the United States intending to complete his studies and live in peace with his family and friends.

After the incident, I spoke with Mustafa over the phone, and he always expressed his great remorse. He said that after he leaves prison, he is determined to continue his life and studies and work. This is all he, and everyone wish for. He always tells me how the incident affected his life and his family, and he regrets what he did.

I ask you, dear Judge, to have mercy and forgiveness for Mustafa, so that we may rejoice together, as we used to always do. Moreover, bring the joy of life back to his family, his friends, and everyone who loved him. I ask from you, dear Judge, to pardon Mustafa.

With all due respect, Mustafa's childhood friend, Alaa Fares.

Law Office of Giuseppe GC Rosselli
601 Broad Street
Sewickley, PA 15143



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Judge Marilyn J. Horan
U.S. Courthouse
700 Grant Street
Pittsburgh, Pa 15219

RE: United States v. Mustafa Mousab Alowemer
cr-19-219

Judge,

My name is Giuseppe GC Rosselli. I represent an individual named Terrance Zeppenfelt, incarcerated at the Allegheny County Jail. I have been informed that Mr. Zeppenfelt and Mr. Alowemer were housed in the same pod at the Allegheny County Jail. Assistant Federal Public Defender Andrew Lipson informed me, that his client noted, that Mr. Zeppenfelt could provide information about the time they shared while at the county jail. At Assistant Federal Public Defender Lipson's request, I interviewed Mr. Zeppenfelt, and the following was his response (verbatim):

Dear Judge Horan,

My name is Terrance Anthony Zeppenfelt. I am a prisoner at the Allegheny County Jail. I've been here since early March 2021, housed on 4E. During that time, my neighbor Mustafa Alowemer and I became close, being block workers, and became friends.

First off, he was one of the best workers. He had a great work ethic and was always reliable. The block workers run the pod to make daily operations smooth. We passed out food trays, cleaned the pod common areas, and worked closely with the C.O's. Only the most reliable and trustworthy inmates are appointed with a block worker position. There are approximately 100 inmates per pod and only six workers. Mustafa established himself as a leader among the pod and pod workers.

Mustafa was so well respected by staff and the inmates that he was approved to teach an Arabic class. Approximately 15 people

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RosselliLawPgh@gmail.com

attended his class twice a week, and I was one of the students. He taught us Arabic letters, numbers, and basic vocabulary. Being in jail for as long as I have, it is difficult to feel normal. Learning and growing as a person helps. I thank Mustafa for the time and attention he spent helping me feel normal, especially during covid when no services were available to help us grow. The level of normalcy in life has changed drastically since.

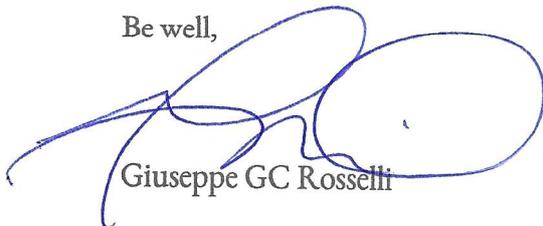
Being housed with Mustafa, we spent a significant amount of time, day in and day out, together. In that environment, you can see daily, weekly, and monthly changes in a person. Mustafa grew and matured in many ways in the time we spent together. From learning to speak better English to managing his emotions productively and positively. Mustafa grew a lot as a man. Although Mustafa is half my age, I see him as a brother and a peer. I've seen him give his last to make sure someone else had, from the littlest things like an envelope to write a letter to big things like the last of his food. On multiple occasions, he prevented fights and confusion from misunderstandings and was always the well-respected voice of reason that fellow inmates listened to.

Your honor, Mustafa has told me that he is very remorseful for his actions. Please consider this perspective of Mustafa when making your decision.

-Terrence Anthony Zeppenfeldt

If you have any questions or concerns regarding this correspondence, please contact me at your convenience.

Be well,

A handwritten signature in blue ink, appearing to read 'Giuseppe GC Rosselli', with a large circular flourish at the end.

Giuseppe GC Rosselli

Dear Judge Horan.

My name is Aisha Saleh, and I am 21 years old. I have 11 members in my family, four of whom live with me in Pittsburgh and the rest in Akron, OH. Currently, I am a substitute teacher for childcare careers and have been with them since August 9, 2021.

I am a former classmate of Mustafa and a family friend of the Alowemer family. I have known Mustafa for 2.5 years and his family for 5 years now. I saw Mustafa in class regularly, often around the school, and sometimes outside of school when I visited the family. Mustafa and I talked frequently when we were classmates, and I am a close friend of his older sister so I talk to the Alowemer family regularly.

Mustafa is a caring person because my sister and I missed the bus home on our first day of school, and we didn't know how to get home because we had just moved from Portland, Oregon, and we were new to Pittsburgh, and the school. We were waiting for our father, who was at work and unable to get to us. When he saw us, he kept walking, but then came back to ask us if we were okay. We told him our situation, he said he could wait with us until our father arrived or he could ask his friend who was driving him home if he could also give us a ride. But we lived in two opposite directions; instead, he waited with us until our father came to pick us up. He made being in a new environment less horrifying.

He is also a very kind person. I understand this from the fact that we went on a class field trip together in my junior year of school, and I had a hard time keeping up with everyone. Halfway through, I got lost, and once I found my way, everyone had left except for him. As soon as he spotted me, he said, "I saw you got left behind and I wasn't sure if you knew where we were going so I waited for you" and this was at a time when we didn't know each other. We had only talked once before when I asked him for a spare pencil. We walked together until we reached the group. That's how kind he is.

Mustafa is one of the most respectful individuals I know. In the last year of school, there was a cultural event going on that required us all to change into costumes. But the bathroom was full, so my friend and I went to the library's quiet reading room to change; Since it was on the same floor, which was also the school's praying room. By the time we got to the library, Mustafa was getting ready to pray. We asked him if we could use the room to change because we were in a hurry, and he left the room for us to use. When we came out of the room, I realized that he was keeping all the other students who were there to pray from entering the room until we were done changing. That kind gesture meant a lot to me.

Unfortunately ever since what happened, I haven't had the chance to actually talk to Mustafa. But the whole experience has affected the Alowemer Family in more ways than one.

Since I first met him, Mustafa has been an excellent friend, a good son, and a great brother. He has shown nothing but kindness, and respect, and has always been very caring to me and everyone around him in the two and a half years that I have known him. His actions were totally out of character, and I am sure he understands how deep the mistake he made was. In light of that, I am asking for mercy and leniency on behalf of his family.

Respectfully ,

Aisha Saleh

If any further information is needed, please feel free to contact me at (412)-377-0492 or salehaisha829@gmail.com

To the honorable judge,

My greetings to you. My name is Amin Ahmed, I am married and I have three children. I am 51 years old, and I live in Jordan. Mustafa and his family were among my closest neighbors. They were very good at dealing with their neighbors, and we used to exchange visits and nights out constantly. They were a great model of a good family. We got to know them when they came and rented the house opposite mine. They were suffering from distress because of the conditions of war in their country, and the loss of all their loved ones' lives, but you did not lose their morals, I was impressed.

They were a can't who raised their children on good morals and ethics despite the harsh conditions they live in. They were a family that was supreme in honesty, loyalty, respect, and shyness. Especially Mustafa, the eldest of them, who had the utmost respect. I once saw him support his old grandmother until he led her to where she wanted, did not leave her side, and kissed her hands out of respect and love. He was kind to his brothers and the people of the neighborhood, he and his brothers were known for their respect and morals in our neighborhood, and everyone is a witness to their politeness. When we knew that they would leave and move, it was very sad, but after we got in contact with them and we saw how happy they were in America, and how humane the American society is, in dealing with them, this was a relief for us after their separation is used we were comforted by their words, and we wished them all the best and happiness.

We hope that you will give Mustafa another chance, as he is one of the best young men, and a lover of the American people, who brought happiness and reassurance to his heart and the heart of his family after he lost it in their country due to the war, and found it in the American country. We trust in your mercy and compassion and I appeal to you, as his family has been affected psychologically by the incident. I hope that you will give him another chance to realize his dreams and build his future.

With all due respect,
Amin Ahmed

Judge Horan,

Greetings. My name is Amira Muhammad. I work as an Arabic translator for refugees. I am 43, married, and have two daughters and a son. I currently live with my husband and son. I got to know Mustafa's family in 2016 when I picked them up at the airport as part of my work with the Refugee Reception Organization. Northern area service center).

Mustafa Al-Awaimer from the beginning drew my attention. He is an ambitious young man who loves to study, work, and put his family before himself. Since his arrival in America, he wanted to focus on studying and working. The evidence of that was when the organization asked him to start work, had reached 18, and he managed the workload at the time asking with facilitating his studies. He is a caring and loving person to his family and always seeks to help them. Mustafa grew up in a respectable and ambitious family, and this thing frankly caught my attention. They are one of the few families that started working immediately after they arrived in America and did not prefer to rely on government aid. Judge Horan, we ask you for mercy and forgiveness for Mustafa, because I am confident that he is a positive person who always seeks to live in peace without any problems. This incident has prevented him from completing his studies and working seriously. Also, it has greatly affected the mental health of the family.

With all due respect to Judge Horan, Amira Muhammad

Honorable Judge Horan,

My name is Andrea Peraza, I am a student at PPU in Pittsburgh PA where I reside and work at FNB as a cashier for approximately 10 months. I met Mustafa during my high school years, when I was in 10th grade, I started talking to him and his sister Shahd, who became my best friend ever since. I saw Mustafa every day at school in the corridors when he walked with his sister to class or after school and several times when I visited them.

Mustafa was a great person when I met him. He was kind and never got into trouble. He was smart and friendly. I never saw him doing anything bad at school, I know he is sorry for what he did and he is affected as well as his family. Also, since Mustafa and his family came to the USA I know that he put a lot of effort into learning and was very dedicated to his studies, started learning English and adapted to a new life here in the US which, as an immigrant, I can relate to. and I know it's not easy, making new friends and learning a new culture as well as for him and his family. Mustafa and his family came to a new country searching of opportunities with dreams and goals to fulfill.

I know that the Alowemer family after Mustafa's arrest was devastated, I know because I was present with Shahed, my best friend, she had to leave CCAC because this affected her emotionally and also the family, many people isolated them because of the problem with Mustafa and I know that The Alowemer family was very concerned about their immigration status since like many refugees they are afraid to return to their countries as this would be condemned to death by their countries. I am supporting the family because I know that all people need second chances, plus a young man like Mustafa who still has a long way to go and to live and have a family, be happy and be able to re-indicate himself in society.

Respectfully, Andrea Mendez

Dear Judge Horan..

My name is Fayza, I'm 29 years old, married and I have an one year old child.

I know Mustafa through his mother she was my neighbor. I meet her first then I meet Mustafa.

Every time I went to visit his mother he was there, so I talked to him several times.

Mustafa was kind and very sweet, he used to joke with me a lot and make me laugh a lot too.

He was Caring for his family and everyone who come to their house. He used to communicate either he speaks your language or not. He was happy all the time.

Your honor please show Mustafa and his family Marcy because they be struggling so much. I know Mustafa have pig heart and he loved everyone. He is well-mannered gentleman, and I am sure he learned from this mistake.

Fayza Mohammed

Dear Judge Horan,

After greetings and respect, I'll introduce myself. I am Mr. Hatem Ahmed Youssef Al-Masry, I am 39 years old, married, and have three children. I work as a car dealer.

I testify that Mustafa and his family are a respectable family with high moral character. I witness their character after four years of being neighbors to them. We were neighbors after they left the war in Syria and went seeking asylum in Jordan. Even after they immigrate to America, we become acquainted with them recently. When Mustafa came to Jordan, he was a child, and that child was lively, loyal, and obedient.

I testify that he was kind to animals. I witnessed him in a situation when children found a cat and were torturing it, and he took the cat from them, sympathized with it, fed it, took care of it, and treated it until it grew up. Mustafa is an ambitious and hardworking person who has moved to America to study, because of the good reputation of the universities there. Mustafa loved the American culture and immersed himself in it. He did a variety of volunteer work, and he respected all people from different platforms, origins, and religions. This is what he used to tell me every time we spoke to them over the phone. I ask you to show mercy on this case for Mustafa and his family. I ask you to be patient with your judgment on this case, because he is a young man in his early years, and we hope that you will give him a second chance in life.

All respect to you,

Hatem Ahmed

Dear Judge Horan,

I am Hussein Kulow, I have been in USA for 7 years, and I have 4 children and I do not work, I have some health conditions. I want to write to you about my relationship to Mustafa and his family.

I know Mustafa through his parents, who used to live in the same neighborhood I live in for almost 2years. I used to see him every couple days, Mustafa was great and very respectful child to his parents and the neighbors, he was not a trouble maker, he was mature person who respects elders and the youngest.

He was nice, kind person, he would always talk to me with respect, every time that he sees me. He was very helpful person, I remember I time I was going to take the bus back to home and I was holding a heavy bags and he saw me waiting and he came to me and offered to drive me in his car, and after he drove me he carried all the bags from the car to my house, it was not onec or twice that he would offer his help it was a couple times. I actually appreciate that it's was very nice of him, If he sees someone needs help he used to help without thinking twice.

I know Mustafa's family was having a very hard time since he was arrested, and I am very sure that your honor will look at him and his family with mercy, him and his entire family are good people who truly deserve a chance, and I am asking your honor to please show them some mercy so they can reunion happily as they were before.

Respectfully,

Hussein Kulow

Hello dear Judge Horan

My name is Ikram Mohammed, I'm from Somalia, I'm 23 years old, I have been living in United States for 7 years with my family, I have 5 siblings, and I came to the USA 2015, 1 year before Alowemer family come. I met Mustafa's sister first at school then after few days I met Mustafa Alowemer in his first day of school. After that him and his family became our neighbors. He was very happy guy and social. I got very close to his sister; we became best friends then I used to see him almost every day. We had some class in our senior year together, he was smart, dreamer, he was always at the top of the class, and the teachers loved him, even the student loved him. He was the kindest person that I have meet. He is a true gentleman, there was a time I lost my phone in school and at that time I didn't know him that much, but still, he give me his phone so I can go home safe, at that time he did not think twice, and did not ask for anything in return. He was very caring person, he like playing with kids, I personally worked with Mustafa Alowemer in 2018 when we used to be in the Learn and Earn program. In that program we used to work with kids for 3 hours and then have an English class for 3 hours. Mustafa and I were working in a kids daycare that was in the same area we lived in, and I remember all kids loved him so much, and they still ask me about him until this day. He liked meeting new people, he had a lot of friends in our 3 hours studying not from our class onley but also the other classes. Mustafa used to change people mood, when he enters a room, the whole mood changes to a fun and cheerful one. He was protective and caring person to his family and very respectful to his parents. He was quite peaceful person.

Your honor I have talked to Mustafa a couple times on the phone, he is well-mannered gentleman, he have learned that what he did was wrong, he have learned a lot from what have happed to him. Your honor I hope and beg you give Mustafa another chance to go back to his family and life, I hope you look at him with mercy, we all need mercy and we all need another chance to make up for what we messed up.

Respectfully,

Ikram Mohammed

Dear Judge Horan

My name is Ismail Mohammed, I am 20 years old and I live with my family.

I know Mustafa from school, we went to the same high school, and used to play soccer together, we also used to have some class together too, I used to see him almost every day in school.

We lived in the same neighborhood for at least 2 years. My family and his family are good friends too, so we used to see each other's almost every day.

He was playful guy that make jokes a lot. He was kind and Helpful, there was A few time that he give me a ride to school. He like to make new friends. He was peaceful guy that if he sees people fighting he try to calm them down. He was hard worker student, and was respectful.

Mustafa's family had a hard time after he want to jail, I hope your honor understands and show some Mercy to Mustafa and his family.

Respectfully,

Ismail Muhammed,

Dear Judge Horan...

My name is Kalthown Nowni, I live in USA, I'm 49 years old I have 5 children. I work at hotel as housekeeper, I have been here for six years, I know Mustafa through his mother I'm friend with his mom and we were Neighborhood for almost two and half years. I used to see the mother almost three times a week.

Mustafa was kind with everyone especially with his mother he was respectful guy help his parents. Lovely to others funny. I remember every time that I go to their house upset Mustafa change my mood to better, he make me laugh so hard. Mustafa was caring person. He was helpful person. He is well-mannered gentleman, and I am sure he learned from this experience.

Please Judge Horan I beg you to give Mustafa and his family another chance, because not only him suffering even his family are very sad for him not being with them.

Sincerely,

Kalthown Nowni

Khaled Houri Zada



Carnegie, PA 15106

June 15, 2022

To: Judge Horan

My name is Khaled Houri Zada, I'm 23 years old who lives in Carnegie town. I've been in the US since 2016 after a long journey in Egypt. I graduated from Brasher high school (where I met Mustafa) in 2017 and then I spent 3 years at CCAC to get my Cybersecurity diploma and I did it. Now I'm working on my resume and trying to get more experience in the field while in the meantime I work as a driver in the city of Pittsburgh Uber/Lyft mostly weekends and I've been doing it for almost a year now.

I met Mustafa at Brasher School in 2017 at one of the ESL classes that I used to take, he seemed a very kind guy and so helpful. He introduced me to other classmates and we started to do a lot of activities together. After I graduated Mustafa and I and some other friends used to hangout a lot. Then, he invited us to his house and I met his family and they welcomed us like if we were one of their own, till this moment I can't forget the taste of the "Mansaf" they made. Mansaf is a traditional Arab dish made of lamb cooked in a sauce of fermented dried yogurt and served with rice or bulgur. What a lovely family.

Mustafa is a hardworking, who used to work hard on himself after school and help his parents and siblings with everything, besides school work and learning English. He struggled a lot at first, we all did. He is honest, respectful and a very caring guy. I'm saying this because I've seen it, I've always tried Mustafa in many things. Whenever we go out to eat somewhere he used to fight over the bill he doesn't want me to pay he pay it all, he is always on time never late at any cost.

One time my mom called me and she told me that she has some stuff from my sister house in Crafton and she wouldn't be able to catch the bus, at that time I was so busy and I couldn't come and get her. So, I called Mustafa and explain to him and he said "Send me the address, I'm on my way" without any hesitation, he came all the way from his house to my sister's and got my mom and drop her off

and took the stuff upstairs. At that time my mom was so tired and I'm really thankful to Mustafa of what he did.

For this reason, I know Mustafa Alowemer to be an honest, compassionate, and dutiful friend. He has done many good things in life. He understands and regrets his lawlessness. He is willing to learn a lesson from his mistakes and move on in his life. I believe that extended-term in jail will be a problem for his future and his family. I know today, he has been going through a very tough time, and for that, I am requesting as his good friend to show him some mercy as his family really needs him.

Thanks for your support.

Respectfully,

Khaled Hourri Zada

A handwritten signature in black ink, appearing to read 'Khaled Hourri Zada', with a stylized flourish at the end.

Honorable Judge Horan,

Greetings to you. I would like to write to you all that I know about Mustafa Musab Al-Awaimer in all honesty and integrity. My name is Manal Al-Falah, born in 1981, and I currently reside in Pittsburgh. Mustafa is a friend of my children, and his family is our neighbor.

I got to know his family through the organization that brought us to the United States on the first day of their arrival in America in 2016, and we are neighbors in the same neighborhood.

Mustafa is a good and ambitious person who loves to study very much. He used to study with my children in the same school, and they used to tell me about him and how diligent he is in his studies.

Mustafa is a nice and respectful person. When I wanted to go to buy the necessities for the house, he would drive me in his car free of charge and with pleasure. He would wait for me until I finished and take me back home. He loved people and took care of his family, and I saw that often because I was visiting his family regularly. After Mustafa came to the United States, he aspired to complete his studies, and he did so, as he completed high school in a short period. Mustafa is a nice person who always cares for people. He used to teach my little son to swim and play with him.

I always talk to Mustafa on the phone because I always meet his mother. He always speaks to me with respect and reassures me and my family. Mustafa regretted what he did.

I ask you Judge Horan to have mercy on him and his mother. You have my sincere thanks and respect.

Manal Al-Falah (neighbor of the Al-Awaimer family and a friend of Mustafa's mother)

Judge Horan,

Greetings to you. My name is Mukhtar Haidara. I was born on [REDACTED]. I live in Pittsburgh. I am married and I have two children, a girl, and a boy. I work in the business field, and I have a supermarket. I got to know the Al-Owaimer family when they came to the United States in 2016 because they and five other families moved to the same neighborhood in which I lived in. I was helping them translate their papers, and I am still in contact with the family to this day. They are a family that deserves respect because they depended on themselves since their arrival in this country. They started working and did not wait for help from anyone. I helped them translate some messages, but they helped me and my family with many things, especially Mustafa who was very kind and liked to help with anything. If I asked him for any help, he would never be late and never hesitate. I saw him several times helping the neighbors move furniture, etc.

Mustafa helped me paint my house for free. He was polite, jolly, and never refused anyone's request. He was happy when he entered the ninth grade and started studying. I would help him sometimes if he encountered difficulty, but he was smart, loved to study, and had great ambitions to complete his studies and then university.

He was telling me that he loved life in America and that he made a lot of friends, and he was a funny person too.

I have heard a lot about what Mustafa and his family went through in Syria, from the difficulties and fears they went through, but he was happy after they passed that stage and came here. I ask you to forgive and have mercy on Mustafa because he deserves a new chance. I think that he is a good young man and deserves to be given a second chance. What happened to Mustafa had a great impact on his life and the lives of his family, their condition worsened after his imprisonment. Mustafa is aware of the mistake he made during the first period in prison, and now he only wants to come back, help his family, compensate, and fix everything.

Your Honor, I am confident in your justice that you will look with compassion and mercy on Mustafa and his family because of what they have suffered from the beginning of the war until this moment. I hope they find the safety and happiness they came for again.

With the utmost respect, appreciation, and sincerity, Mokhtar Haidara

To the esteemed Judge Horan,

I'm Ramiya Muhammad Al-Nuaimi, I'm 37, married, I have two children, and I live with them in Jordan. I have a strong relationship with Mustafa. I am his aunt. I have known him since he was a child and I kept in touch with him and his family even after he traveled to the United States of America in 2016. Dear Judge, I heard what happened with Mustafa, and this is an unfortunate thing, though I am sure that he will be far from being in his mother's arms soon. I want to tell you and explain about my relationship with Mustafa, his qualities, and his character since he was a child until this painful thing happened to him.

Your honor, I have known Mustafa since he was a child. He has great personal and social qualities from a young age. He loved doing good for others, and he was a kind and merciful human being. I never saw him causing or being the reason behind any harm, quite the opposite, he was always against violence and steered away from it. He was always eager to learn and thriving to finishing his education. That's why he immigrated to the United States. For he told me once when he was leaving to the US, "I don't see a better place other than the United States to grow and continue in my education, especially that it's a country that is so accepting of cultural diversity and that is very receptive."

Mustafa always was and still is kind, merciful, shy and social. Mustafa is a social person who loves the family atmosphere and used to meet with us a lot before he moved to the United States.

Dear Judge, after Mustafa moved with his family to live, and then settled in the United States, I communicated with him through social networks, where he was telling me about life in America and about American society and culture. He also told me that he was happy to make new friends and how he came to feel that he was born into American society. He also told me about his strong desire to enroll in a prestigious American university.

Dear Judge, as I present my testimony with full confidence in the mercy and justice of the American judiciary, I believe that a young man of Mustafa's age deserves a chance to regain his life and return to be a righteous young man who is useful to society.

Dear Judge, when Mustafa entered prison he had just finished high school in the United States, does he not deserve the opportunity to complete his education? Dear Judge, I ask you to consider the case of Mustafa with eyes of mercy. I ask you for a merciful ruling that restores life to Mustafa and his family. Dear Judge, I hope to see Mustafa among his family soon, and this is what we are entrusting with the American judiciary.

With my full respect,
Ramiya

Dear Judge Horan,

My name is Saleh Hassan Faris, I was born in [REDACTED] and I am 28 years old and I live in Dallas Texas and I have 2 daughters and I son.

I have known Mustafa Musab Alowemer since he was a young child in Syria and in Jordan where we were both neighbors and after that we moved to the United States in the same year of 2016.

Mustafa used to help others with everything he could, he used to volunteer his time with food charities in the Islamic center of Pittsburgh, ICP, to give people of need. I used to go there to get the needed food for my children and I used to see Mustafa hold the heavy boxes for people and reach it their cars. He was kind to his family, as I used to see how he used to treat and talk to them whenever I visited their house.

Mustafa was interested in studying as he finally got the chance to go back to school after he lost that chance in Syria and Jordan. He was respectful to everyone, and very sweet hearted, he used to play with my children and hold them a lot and always by them snacks

Your Honor as a close friend to Mustafa's family, I saw his parents suffer day after day after he got arrested, his mother suffered from grief and illness. His family suffer from the absence of their son because he was perfect and compassionate with them.

Your Honor I ask you to look at Mustafa and his family with mercy and leniency and give them another chance. Mustafa is very aware that what he did was wrong, his parents have told me that he is aware of his mistake, and I talked to him a couple times he told me how much he wants to come out to help his parents and go back to his family.

I ask your honor to give Mustafa another chance and look at him and his family with mercy.

Respectfully,

Saleh Hassan Fares

Dear Judge Horan,

My name is Samah Malas and I'm 46 years old. I live with my husband and my 3 kids in Pittsburgh. My husband is sick, so I help take care of him. I also teach Arabic to kids from time to time. My family and I have known the Alowemer family since 2017 and have been very close since then. We visit each other and sometimes we'd go out to parks together. Mustafa used to help us in preparing for the picnic. He would make sure that everyone is happy and comfortable. He would ask me and my family if we needed anything and would offer to help us when needed. Mustafa loves his family so much and would do anything to make them happy and comfortable. He is very kind and he would offer food to strangers because he doesn't like eating without sharing. He is also very respectful and wouldn't enter a room that we are in without knocking and knowing that we are all covered since we are Muslims and wear a hijab (headscarf). He works very hard to provide for his family even if has school or after-school. I remember how hard he worked to get his English to a better level and how hard he worked to graduate high school. He had plans to go to college and get a degree that he could use to better himself for his family and provide for the country that has given him a home to live in. Mustafa is very kind and thinks the best of everyone. He doesn't believe that anyone would harm him because he doesn't think of harming anyone. His family misses him dearly and he misses them. So Judge Horan, please have mercy and leniency for him and for the sake of his mother that cries everyday for her son. He wants to be an even better person for himself and for his family because he understands even more how important family and a good life are.

Sincerely,

Samah Malas

Dear Judge Horan.

I'm Sandus Altam, 23 years old, from Yemen. I've been here for five years. A second year at the Community College of Allegheny County.

I have known Mustafa and his family for five years. I met his sister Shahd first at Brasheer High School, and then Mustafa. I have a strong relationship with them. Shahd is my friend. Mustafa and his siblings are also my friends. I visit them often. They have very kind parents; their house is full of love.

Mustafa is a calm, polite and very hardworking person. He always seeks to help his parents, siblings, and helps everyone around him. After moving to America, he was trying to complete high school in order to go to university and work to help his family and improve their situation.

Every time I met him, he greeted me with a smile and a welcome. We used to sit together every day at school and joke and laugh with each other, he was kind to everyone.

Mustafa is a good person with a big heart. I hope you forgive him. We all deserve a second chance to change ourselves and fix what we messed up.

What happened to Mustafa was a huge shock to all of us and his family. They were very tired and every time I saw Mustafa's mother, I saw her tears. This family deserves to be happy. Mustafa realizes that he made a mistake and that admitting a mistake is the first step to fix it.

Your Honor, we ask you to pardon Mustafa, and to give him a chance to start over and build a happy life with his family.

With all my respect,

Sandus Altam

Dear Judge Horan,

My name is Suhair Ayasso, I am 58 years old, and I live with my husband and children in Murrysville, PA. I worked as a volunteer with the Ansar organization for over 2 years and met Alowemer family in 2016 when they fled Syria for fear of their lives and arrived in the US. With Ansar, I helped with translating paperwork and adjusting them in general to their new lives.

I met Mustafa many dozens of times during my 2 years with Ansar and he never exhibited anything other than a kind heart and gentle manner. I saw it with his family: one time I was visiting the family for paperwork and his mom happened to be sick and Mustafa was sitting next to her rubbing her feet with tears in his eyes. He was even helping his family financially while studying because of his father's illness. I also saw it with my own family and in the community: he was always happy to take care of my dog for long weekends and played with him with true affection. Mustafa would often watch over the neighbor's kids for free while they were out.

Despite working, studying, learning a new culture, and learning a new language, Mustafa never had problems at school. In Jordan, he had to work to support his family and stop his studies due to his dad's illness. In the US he was able to reach his dream – to graduate from high school with high honor in the US – within 3 years despite English being his second language.

The US saved this young man's life by offering him a safe home, him and his family and you can save it again by pardoning him. At his age he has his entire life ahead of him. Please look at him with mercy.

Please, your honor, consider this young man whose life depends on your kindness to him.

Thank you, God Bless America.

Respectfully, Suhair Ayasso

To the esteemed Judge Horan,

I am Tahani Khalil Al Sankari, born on [REDACTED]. I live in Texas. I am married and have 3 children. I do not work, because I take care of my young children.

I know Mustafa and his family from Jordan, where we were neighbors, and we saw each other there, almost daily. I remember when I got to know Mustafa, he was young and he used to work to help his family.

He was a very calm and kind person who was also very responsible and caring for his family. After the period we spent in Jordan, I moved to the United States, and Mustafa's family had traveled three months before us. I remember when I first saw them, they were all very happy. Mustafa went back to school after a long absence from school. He was very happy to be back in school and he knew a lot of people.

At that time, I had two children, one at the age of four and the second was a baby. Mustafa would play with my daughter and bring her snacks. She loved him very much, and he would help carry my baby girl. Mustafa was one of the nicest people. I remember after my family moved to live next to Mustafa's house, he was helping a charitable organization that helps refugees to transport things to their families, although he used to go to school and come back tired.

Mustafa was a jokester and a fun person because he used to smile a lot and laugh in front of us all. I was surprised after hearing what happened to Mustafa because he is a good young man. My family was also shocked by the incident, because he was an ideal young man, and cared for his family and those around them, a lot.

I spoke with Mustafa after he was detained, and he hopes that he will be released from prison and continue his normal life with his family and friends again, in peace and tranquility, free of problems.

so I ask you, your honor, to have mercy on Mustafa, forgive him, and give him a second chance. I ask you to have mercy on his family, who suffer greatly because of his distance from them.

Thank you very much and much time,
Tahani Sankari

Hello Judge Horan,

Greetings to you. First, I would like to introduce myself. My name is Turkiya Al Deeb. I have a family of 5, 4 boys and a girl, and I live in Dallas, Texas. I am fifty-two years old and have known Mustafa's family for about 25 years.

They lived near my house in Syria, and I have a good relationship with them. I know Mustafa well.

Mustafa is a very kind person with many nice and humane attitudes. At the beginning of Mustafa's life in the United States, he was helping refugees with the Ansar Association, and non-refugees by providing them with housing and helping to secure their living. One day I saw him helping one of his neighbors move the furniture from their house. He never asked for anything in return from anyone for his work. He was diligent in his studies and was helping his friends at school with their homework.

I ask you, dear Judge, to pardon and give him a second chance. We ask you, dear Judge, to have mercy on Mustafa and his family. This incident greatly affected Mustafa's family, especially the mother, who was affected so badly that it caused a health crisis for his mother and father. I ask you for mercy and forgiveness for Mustafa to continue his life with his family, loved ones, and friends. Please give him and his family a chance to live happily ever after.

With all my greetings and respect to you,
Turkiya Aldeeb

Dear Judge Horan,

My name is Viane, I knew Mustafa since him and his family got to America. He was a good guy he used to play soccer with us me his brother and sum other kids, and he used to take us to school in his car.

we went to the pool together, he was known for his good work in school, he was always helping us with our work, he made sure we were good kids in school he's a really good guy.

Please look at him with mercy, he deserves a second chance,

Sincerely,

Viane

Dear judge Horan,

My name is William Urbina, Mustafa and I went to high school together and I always saw him as a good example of a good classmate. he used always help and serve other students, also he used to help the teachers by being an Arabic interpreter. I am sure I am not the only one that thinks he deserve a chance because he used to help lot of people in the community. Mustafa is a very intelligent person he always used to help his dad by supporting and getting good grades at school.

our teachers had him as one of the best students of the year on every class.

considering the case of Mustafa Alowemer, he deserves an opportunity to support and help the community as he used to, Mustafa is one of us he belong to his family and this community of good people.

Respectfully,

William Urbina

Hello, Honorable Judge Horan

My name is [REDACTED]. I am 14 years old, born [REDACTED]. I finished middle school this year and going to high school, God willing. I live with my mother, father, and brothers. I love my family very much and they love me because I am the youngest.

I am the youngest brother of Mustafa. He is my older brother. I also have a sister and a brother besides Mustafa. I love them all, especially Mustafa because when I was a small child, he took care of me and brought me everything I asked for. He carried me on his back so that I would not get tired, and my mother told me that he was the one who taught me my first steps when I was a child. He helped me walk. He spent a lot of time playing with me as a child, took care of me and my brothers, obeyed my father and mother, and never angered them. Mustafa, my kind-hearted brother, never likes to be angry with anyone. He likes to help with everything.

He always bought me juices, chips, and everything that my siblings and I asked for. He used to buy gifts for my mother, sister, and everyone. When we came to America, he taught me how to swim because he promised me that. He also taught my brother Hammam how to swim as well. He wanted to teach my mother and sister too. As a child, I do not remember many things, but I do remember that he was the nicest person because he used to take us on picnics, my mother, siblings, and I; because my father was always working.

Mustafa was very happy when he went back to school. He was helping me with my homework during that time as well. My mother was glad that we all went back to school, which is something that we were deprived of in Syria.

Mustafa had many friends. He used to call my mother while he was at school telling her to prepare food because he will bring his friends with him. My mother used to prepare many food items for him and his friends because he loved them very much. His friends liked my mother's food very much.

He loved everyone, and everyone loved him too because he had a good heart. He graduated from high school with good grades. I remember the day he graduated very well. We were happy, and my mother was crying out of joy.

He is very kind because he also promised me that he would teach me to drive. Mustafa was also the one who taught my mother to drive, but he was not able to teach her to swim, as he promised her. He will do that when he gets out of prison, God willing.

I am very sad because he promised me many things and was not able to have time to do them because of his imprisonment. I love him so much because he helped my mother, father, and my brothers. He did this even though he was tired a lot due to the labor during his young age.

He was deprived of school because of the war and was working in the fields with my mother when my father was injured. He did this, to financially provide for us until my father recovered.

In Jordan, he used to walk with me to school every day, and when school was over, I would always find him waiting for me outside the school to accompany me home due to my safety.

Your Honor, please forgive my brother, Mustafa, because he is kind-hearted. Forgive him for the sake of his future and all of us. We are suffering a lot after his absence, especially my mother, and my father, who need him very much. We also have never felt happy since his imprisonment. Please, please, restore joy to all of us.

Mustafa has changed and realized the mistakes he made, and saw what happened to all of us as a result of this incident. Please forgive him for the sake of my sick mother and my father. They need him and his siblings need him too. Please forgive him this time, and this will never happen again. He will be a very successful person, I am sure of that, because he loves us, and he will not bring us sadness again.

He tells us now that he will compensate us for everything that happened to us during his imprisonment, and for all the pain and suffering that happened to everyone in the family. Please do not disappoint me, and I hope you can pardon my kind brother.

With my sincerest regard, and appreciation for your justice,



THIS IS TO CERTIFY THAT

MUSTAFA MOUSAB ALOWEMER

HAS ACHIEVED A HIGH STANDARD OF ACADEMIC EXCELLENCE AND
IS HEREBY PLACED ON THE

HIGH HONOR ROLL

AT PITTSBURGH BRASHEAR HIGH SCHOOL

THIS FOURTEENTH DAY OF FEBRUARY TWO THOUSAND AND SEVENTEEN



A handwritten signature in black ink, appearing to read 'K. Safran'.

KIMBERLY SAFRAN
PRINCIPAL



CERTIFICATE *of* ACHIEVEMENT

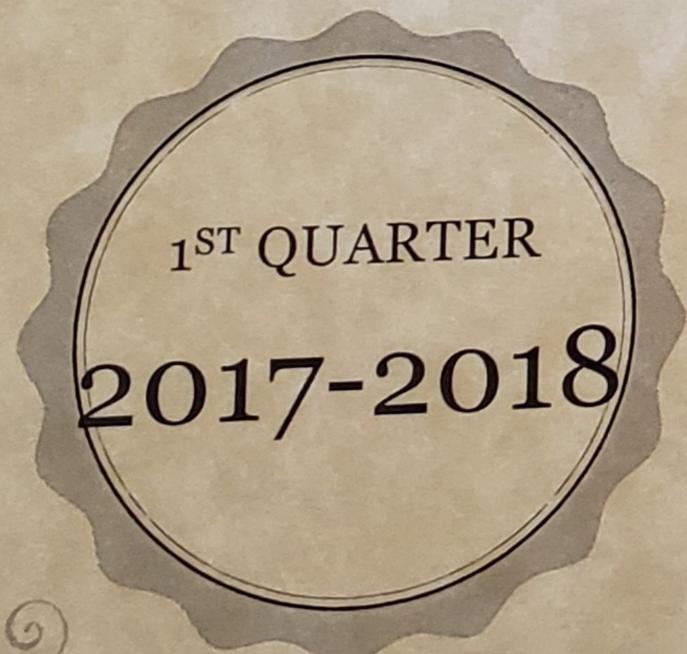
THIS ACKNOWLEDGES THAT

Mustafa Mousab Alowemer

HAS SUCCESSFULLY ACHIEVED HIGH HONOR ROLL

Pittsburgh Brashear High School

3.5-4.0 GPA



A handwritten signature in black ink, appearing to read "K. Safran".

KIMBERLY SAFRAN, PRINCIPAL



THIS IS TO CERTIFY THAT

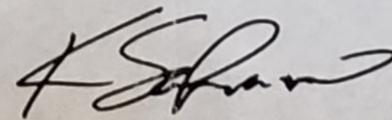
MUSTAFA MOUSAB ALOWEMER

HAS ACHIEVED A HIGH STANDARD OF ACADEMIC EXCELLENCE AND
IS HEREBY PLACED ON THE

HONOR ROLL

AT PITTSBURGH BRASHEAR HIGH SCHOOL

THIS NINTH DAY OF NOVEMBER TWO THOUSAND AND EIGHTTEEN



KIMBERLY SAFRAN
PRINCIPAL



THIS IS TO CERTIFY THAT

MUSTAFA ALOWEMER

HAS MAINTAINED A CUMULATIVE GRADE POINT AVERAGE OF 3.0 - 3.49
AND IS HEREBY AWARDED



HONOR ROLL



AT PITTSBURGH BRASHEAR HIGH SCHOOL

THIS TWENTY-FIRST DAY OF MAY TWO THOUSAND AND NINETEEN

KIMBERLY SAFRAN
PRINCIPAL

Exhibit E

Certificate of
Recognition

Mustafa Mousab Alowemer

is awarded this certificate in recognition of

Password (English)

this **30th** day of **March**

in the year **2017**.

Signed **PPS World Languages Department**



Certificate of

PARTICIPATION

This certifies that

Mustafa Alowemer

has participated in

PPS WORLD LANGUAGES SPEAK-A-THON

Awarded this **30th** *day of* **March** *in the year* **2017**

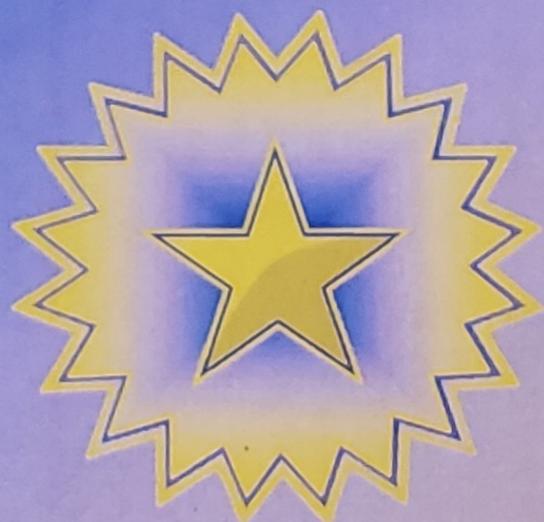
Signed **PPS World Languages Department**



Brashear High School

CERTIFICATE OF EXCELLENCE

is hereby granted to:



Mustafa Alowemer

for outstanding performance in

ESL ENGLISH

2016-2017

Date: 6/2/17

Exhibit E

Kathleen W. [Signature]

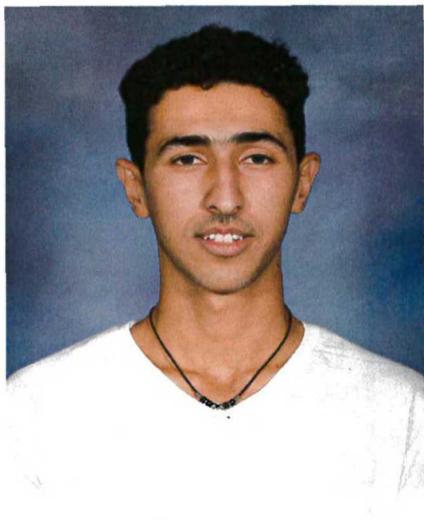
Congratulations to Our MAY Students of the Month!



12
th

Aisha Saleh

1. Fav thing about school? **English class**
2. Fav teacher: **Mrs. Meade**
3. Fav subject: **Sociology**
4. Future plans: **Graduate, go to college, get married, travel and have kids**
5. Hobbies/Pastimes: **Watching movies**
6. One person I look up to, and why: **My sister because she's inspirational**
7. Advice for your fellow classmates: **Pay attention in class**



Mustafa Alowemer

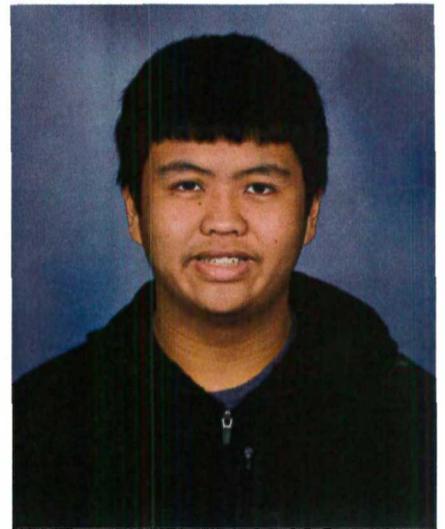
1. Fav thing about school: **The support that teachers give to students.**
2. Favorite teachers: **Mrs. Meade and Ms. Daley**
3. Favorite subject: **U.S History**
4. Future plans: **Having a good job and living a happy life**
5. Hobbies/Pastimes: **Having fun with best friends**
6. Activities: **Soccer**
7. Who is one person you look up to, and why? **My mom, she's the only reason I'm here at school.**
8. Advice for fellow classmates: **Always be positive and respectful**



11
th

Elysia Ruff

1. Fav subject: **English**
2. Favorite teacher: **Ms. Germansky**
3. Your future plans: **To become a secondary English teacher**
4. Fav book: **The Lorax**
5. One person you look up to and why: **My mom because she's awesome**
6. Advice for your fellow classmates: **Come to school everyday**



Sagel Sison

1. Fav thing about school: **Learning things I used to find difficult.**
2. Fav teacher: **Ms. Germansky**
3. Fav Subject: **Math**
4. Future plans: **Go to CCAC**
5. Hobbies/Pastimes: **Chess, rock climbing, listening to music**
6. Fav song: **Build a God Then We'll Talk**
7. One person I look up to, and why? **Mr. Weiblinger, he tells us upfront what we did wrong and how to improve on our grades.**
8. Advice for your classmates: **Take advantage of your education because time will go by fast.**



10
th

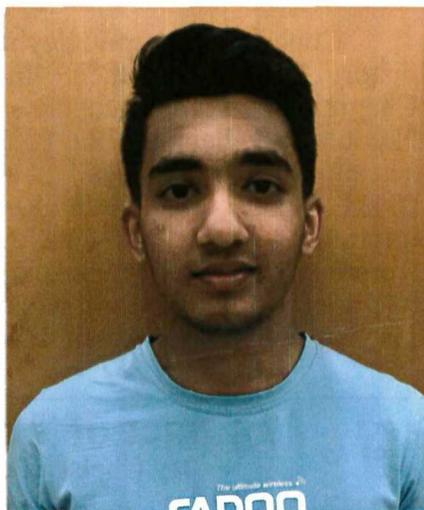
David Ademoye

1. Favorite thing about school? **Learning & participating in sports**
2. Fav teacher: **Mr. Baker**
3. Fav subject: **Algebra**
4. Future plans: **Becoming an airline pilot/commerical pilot & also have a doctorate degree**
5. Hobbies/Pastimes: **Watching movies, eating, and playing video games.**
6. Activities: **Soccer & track**
7. Fav artist: **Drake & Cardi-B**
8. Who you look up to: **My parents & Albert Einstein because they encourage & motivate me to never give up on my dreams.**
9. Advice for your classmates: **Be responsible, work hard, never give up, fight for your place, and never listen to negative perspectives from people.**



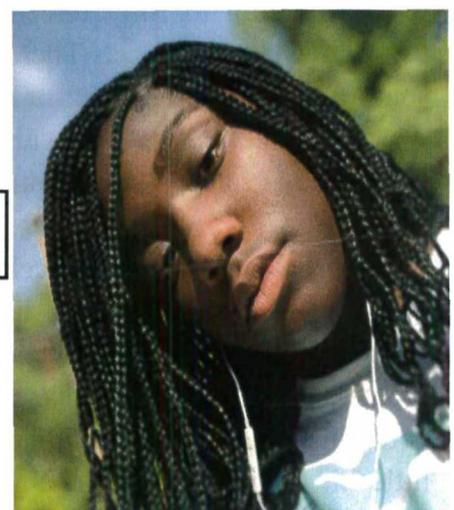
Yulduzknon Turdikolova

1. Fav thing about school: **Afterschool activities & sports**
2. Fav teacher: **Mr. Baker**
3. Fav subject: **English**
4. Future plans: **Get accepted to Penn State University or RMU & have a 4.0 GPA**
5. Hobbies/Pastimes: **My favorite pastime is going back to my country. For my hobbies, I like to write short stories & quotes**
6. Fav movies: **Turkish movies**
7. One person I look up to and why: **My aunt because when she goes through bad days she's still strong all the time.**
8. Advice for fellow classmates: **Do not give up on education when it gets challenging or you will get lost!**



Thet Paing

1. Fav thing about school: **Teachers**
2. Fav teacher: **Mr. Mallow**
3. Future plans: **To be a pilot**
4. Extracurriculars: **Baseball, photography & video games.**
5. Fav movie: **Harry Potter is my favorite movie**
6. Fav Artist: **Sia is my favorite artist**
7. Fav Subject: **Math**



9th

Tasia Smith

1. Fav teacher: **Mr. Mallow & Mr. Lukas**
2. Fav subject: **English**
3. Future plans: **Become a history teacher**
4. Extracurriculars: **Bird watching with my close friend**
5. Hobbies/Pastimes: **Listen to music and chill**
6. Fav book: **The Fault in Our Stars**
7. Fav movie: **Hunger Games**
8. One person I look up to and why: **My mom because she is very hard working and never gives up.**
9. One thing you want people to know: **I'm very supportive and I try my best at everything I do**
10. Advice for your fellow classmates: **Work hard, don't give un on anything & you can do anything you put your mind to.**

Exhibit E



Carlow University & Neighborhood Learning Alliance
proudly recognizes:

Mustafa Alowemer

upon the successful completion of the course,
Foundations of Writing
as part of the High School to College Immersion Program

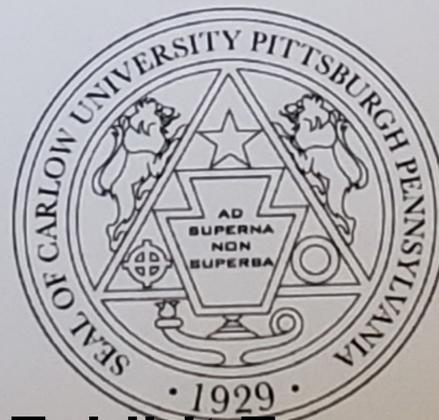


Exhibit E



sp2.org

Mustafa Alowemer

has successfully completed

online training for

**S/P2 Automotive Service Pollution
Prevention**

Account ID#: 60556
Location: Brashear High School
590 Crane Ave, Pittsburgh, PA 15216
Certificate Valid Thru: August 31, 2019

A handwritten signature in blue ink, appearing to read 'Kelly Zeih', written over a horizontal line.

Kelly Zeih, Director of S/P2



sp2.org

Mustafa Alowemer

has successfully completed

online training for

S/P2 Automotive Service Safety

Account ID#: 60556
Location: Brashear High School
590 Crane Ave, Pittsburgh, PA 15216
Certificate Valid Thru: February 2, 2019

A handwritten signature in black ink that reads 'Kelly Zeih'. The signature is written in a cursive style with a horizontal line underneath it.

Kelly Zeih, Director of S/P2

Exhibit E

S/P2[®]

sp2.org

Mustafa Alowemer

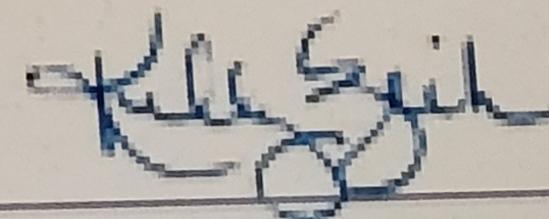
has successfully completed

online training for

**Land That Job: Interview Skills for
Automotive Students**

Account ID#: 60556
Location: Brashear High School
560 Crane Ave, Pittsburgh, PA 15216
Certificate Valid Thru August 31, 2019

Exhibit E



Kelly Zeih, Director of S/P2



sp2.org

Mustafa Alowemer

has successfully completed

online training for

Land that Job! Building a Resume

Account ID#: 60556
Location: Brashear High School
580 Crane Ave, Pittsburgh, PA 15216
Certificate Valid Thru: August 29, 2019

A handwritten signature in blue ink that reads 'Kelly Zeih'. The signature is written in a cursive style and is positioned above a horizontal line.

Kelly Zeih, Director of S/P2

Exhibit E



sp2.org

Mustafa Alowemer

has successfully completed

online training for

Supervisor's Course

Account ID#: 60556
Location: Brashear High School
580 Crane Ave, Pittsburgh, PA 15216
Certificate Valid Thru: August 31, 2019

A handwritten signature in blue ink, appearing to read 'Kelly Zein', written over a horizontal line.

Kelly Zein, Director of S/P2

November 8, 2018

Mustafa Alowerner

[REDACTED]
Pittsburgh, PA 15214-2561

Dear Mustafa,

Congratulations on your acceptance to the Community College of Allegheny County!

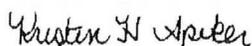
We are delighted you have chosen CCAC as a path to your personal and professional goals. Our dedicated faculty is committed to providing you with the skills and knowledge you will need for today's changing work force. We congratulate you on your accomplishments to date and look forward to you joining our campus community.

You have been accepted in the Current High School Student program for the Fall 2019 - August through December semester. An email has been sent to you outlining the steps needed to complete the enrollment process. Please follow those steps but feel free to ask for assistance along the way.

Your CCAC Student ID number is 1412055. Please keep this number in a safe place and refer to it when you contact us regarding your student record.

Again, congratulations on your acceptance to the Community College of Allegheny County! If you have any questions, please feel free to contact the Office of Admissions at the campus of your choice where our goal is your success.

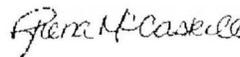
Sincerely,



Kristin Spiker
Director, Admissions
Allegheny Campus



Elizabeth Strenkowski
Director, Admissions
Boyce Campus



Rhena McCaskill
Director, Admissions
North Campus



Brenna Jones
Director, Admissions
South Campus