

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON T. DANIELS (a/k/a “HARUN  
MUHAMMAD”) and (a/k/a “ABU YUSUF”),

Defendant.

CASE NO. 2:16-cr-222

CHIEF JUDGE EDMUND A. SARGUS, JR.

**GOVERNMENT'S PLEA AGREEMENT SUBMISSION**  
**OF ELEMENTS AND PENALTIES FOR**  
**18 U.S.C. § 2339B**

**1. ELEMENTS: Providing or Attempting to Provide Material**  
**Support to a Designated Foreign Terrorist Organization**  
**18 U.S.C. § 2339B**  
**(Count Two)**

- First: The defendant knowingly provided or attempted to provide material support or resources to a foreign terrorist organization; and;
- Second: The defendant knew that the organization was a designated terrorist organization, or that the organization had engaged or was engaging in terrorist activity or terrorism; and
- Third: These acts occurred on or about the dates alleged in the Indictment in the Southern District of Ohio and elsewhere.

**2. PENALTIES**

- A. Mandatory Minimum: None.
- B. Possible Maximum: Twenty years in prison, a fine of \$250,000.00, a term of supervised release for life, and \$100 special assessment.

Respectfully submitted,

BENJAMIN C. GLASSMAN  
UNITED STATES ATTORNEY

s/Jessica W. Knight

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JESSICA W. KNIGHT (0086615)

JESSICA KIM (0087831)

Assistant United States Attorneys

JOSEPH M. GIBSON

Special Assistant United States Attorney (0084587)

303 Marconi Boulevard, Suite 200

Columbus, Ohio 43215

Phone No.: (614) 469-5715

Fax No.: (614) 469-2200

Email: [Jessica.Knight@usdoj.gov](mailto:Jessica.Knight@usdoj.gov)

Email: [Jessica.Kim@usdoj.gov](mailto:Jessica.Kim@usdoj.gov)

s/Michael J. Dittoe

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Michael J. Dittoe (6191470)

Trial Attorney

U.S. Dept. of Justice

National Security Division

Counterterrorism Section

950 Penn. Ave., N.W.

Washington, D.C. 20530

Phone No.: (202) 307-3804

Email: [Michael.Dittoe2@usdoj.gov](mailto:Michael.Dittoe2@usdoj.gov)