

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2016 NOV 10 PM 1:35

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON T. DANIELS,
a/k/a Harun Muhammad,
a/k/a Abu Yusuf,

Defendant.

CASE NO. 2:16-cr-00220

JUDGE Sargus

INDICTMENT
18 U.S.C. § 2339B

FORFEITURE

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EAST. DIV. COLUMBUS

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment:

1. The defendant, **AARON T. DANIELS a/k/a Harun Muhammad a/k/a Abu Yusuf (“DANIELS”)**, resided in Columbus, Ohio, within the Southern District of Ohio.
2. On or about October 15, 2004, the United States Secretary of State designated al-Qa’ida in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act, and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.
3. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224, to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary of State also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham (“ISIS”), the Islamic State of Iraq and Syria (“ISIS”), ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh,

Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary of State added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS. To date, ISIL remains a designated FTO.

COUNT ONE
(Material Support to a Foreign Terrorist Organization)

1. Paragraphs 1 through 3 of the Introduction Section of this Indictment are incorporated herein by reference.

2. On or about January 29, 2016, in the Southern District of Ohio and elsewhere, the defendant, **AARON T. DANIELS a/k/a Harun Muhammad a/k/a Abu Yusuf**, did knowingly provide, and attempt to provide, material support and resources, to wit: \$250.00 in funds, to a foreign terrorist organization, namely ISIL, knowing that ISIL is a designated terrorist organization and that ISIL has engaged, and engages, in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

COUNT TWO
(Attempting to Provide Material Support to a Foreign Terrorist Organization)

1. Paragraphs 1 through 3 of the Introduction Section of this Indictment are incorporated herein by reference.

2. On or about November 7, 2016, in the Southern District of Ohio and elsewhere, the defendant, **AARON T. DANIELS a/k/a Harun Muhammad a/k/a Abu Yusuf**, did knowingly attempt to provide material support and resources, to wit: himself, as personnel, to a foreign terrorist organization, namely ISIL, knowing that ISIL is a designated terrorist organization and that ISIL has engaged, and engages, in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One and Two of the Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) & (G), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c).

2. Upon conviction of any of the offenses set forth in Counts One and Two of this Indictment, the defendant, **AARON T. DANIELS a/k/a Harun Muhammad a/k/a Abu Yusuf**, shall forfeit to the United States any property, real and personal, which constitutes or is derived from proceeds traceable to the offenses, and/or all assets, foreign or domestic of the defendant acquired and maintained by the defendant with the intent and for the purpose of supporting, planning, conducting, and concealing the violation; and/or derived from, involved in, and used and intended to be used to commit the offenses.

Substitute Assets

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

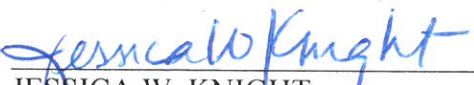
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(2) and 28 U.S.C. § 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and (G), Title 28, United States Code, Section § 2461(c) and Federal Rule of Criminal Procedure 32.2.

A True Bill.

s/Foreperson
Grand Jury Foreperson

BENJAMIN C. GLASSMAN
United States Attorney


JESSICA W. KNIGHT
Assistant United States Attorney