

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 16-80107-CR-ROSENBERG**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**vs.**

**DARREN ARNESS JACKSON,  
a/k/a "DAOUD,"**

**Defendant.**

**FACTUAL BASIS IN SUPPORT OF PLEA**

If this case were to proceed to trial, the United States would prove, beyond a reasonable doubt, the following facts, among others. This factual basis is being provided for the limited purpose of establishing a factual basis for the defendant's guilty plea pursuant to Fed. R. Crim. Pro. 11(b)(3) and is not inclusive of all the facts the United States would offer and prove at trial. The defendant, by his signature below, admits and agrees to the facts set out below.

1. On or about May 11, 2016, defendant DARREN ARNESS JACKSON, aka Daoud, ("JACKSON"), was introduced by co-defendant Gregory Hubbard, aka Jibreel, (Hubbard), to an individual who unbeknownst to both was an FBI confidential human source (CHS).

The CHS was posing as an Islamic State of Iraq and the Levant (ISIL)<sup>1</sup> follower who wanted to travel to Syria to engage in violent jihad. This meeting occurred in West Palm Beach, Florida, at an indoor shooting range. At that time, both JACKSON and Hubbard resided in West Palm Beach, Florida, although JACKSON was often out of state for work. JACKSON met with his co-defendants and the CHS primarily in Palm Beach County during the conspiracy. At a subsequent meeting on May 20<sup>th</sup> between the CHS and co-defendant Hubbard, Hubbard told the CHS that JACKSON had previously talked about going to Syria but Hubbard did not think JACKSON would go.

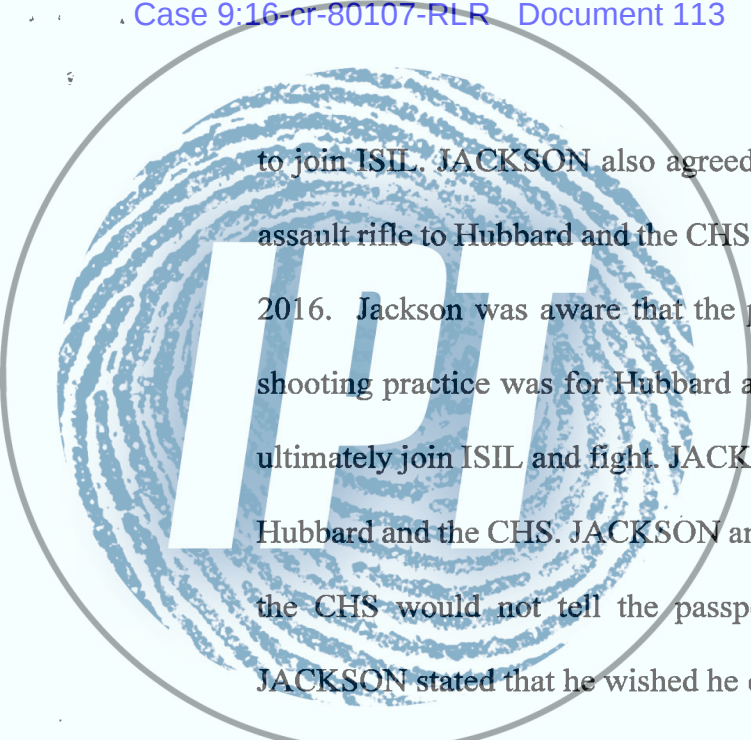
2. At various times during the conspiracy, JACKSON and co-defendants Hubbard and Dayne Christian, aka Shakur, (Christian), in recorded conversations with the CHS, talked about their support for ISIL and violent jihad, including acts of terrorism committed by and attributed to ISIL and its supporters. They also expressed a desire to travel to Syria to join ISIL. At various times when JACKSON was with co-defendants Hubbard and Christian, they used the term "soccer team" as code to refer to ISIL. JACKSON has known Hubbard for years and was present on various occasions when Hubbard discussed his support of ISIL

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<sup>1</sup> On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq, 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. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a 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 ISIL as its primary name. The Secretary 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. Although the group has never formally called itself "Al-Qaeda in Iraq," this name has frequently been used to describe ISIL through its history. In an audio recording publicly released on June 29, 2014, ISIL announced a formal change of its name to Islamic State ("IS"). To date, ISIL remains a designated FTO.

and his desire to travel to Syria and join ISIL. JACKSON also received various videos and links from Hubbard containing ISIL propaganda and materials. These materials contained videos and photos, among other things, depicting ISIL's involvement in terrorism and terrorist activity.

3. On May 12, 2016, JACKSON met with Hubbard and the CHS. While together, the group viewed various ISIL propaganda videos, including footage of an attack on Egyptian Police in the Sinai Peninsula, a video featuring female ISIL fighters, and scenes depicting the execution of Syrian soldiers. JACKSON made favorable comments regarding ISIL and its actions at various times during the evening.
4. JACKSON met with Hubbard and the CHS on July 7, 2016, and they again watched ISIL propaganda videos. JACKSON expressed favorable views of ISIL, describing ISIL as "the truth." JACKSON stated that he wanted to learn more about Islam, learn Arabic, and improve his physical fitness before deciding to travel to Syria to join ISIL and fight.
5. On or about July 9, 2016, JACKSON, Hubbard, the CHS, and another known individual went shooting at a remote Palm Beach county wildlife management area. The group initially shot pistols and, after lunch, the group began shooting rifles, to include an AK-47 style assault rifle provided by co-defendant Christian. JACKSON provided the following weapons for shooting practice that day: two pistols (one 9 mm and one .40 caliber), one AK-47 style assault rifle, and one .12 gauge shotgun.
6. On or about July 14, 2016, JACKSON agreed to take Hubbard and the CHS to Miami International Airport for their scheduled travel overseas on July 21, 2016. JACKSON was aware that Hubbard and the CHS planned to travel together to Germany and then subsequently travel to Turkey and from there to ultimately cross the border into Syria



to join ISIL. JACKSON also agreed to provide his pistols, shotgun, and AK-47 style assault rifle to Hubbard and the CHS at a planned firearms training on or about July 16, 2016. Jackson was aware that the purpose of Hubbard and the CHS in engaging in shooting practice was for Hubbard and the CHS to prepare for their planned travel to ultimately join ISIL and fight. JACKSON said that he wished he could do more to help Hubbard and the CHS. JACKSON and the CHS discussed that when the CHS returned, the CHS would not tell the passport people the truth about where he had been. JACKSON stated that he wished he could go with them.

7. On or about July 15, 2016, JACKSON, Hubbard and the CHS met and made plans with Christian to hold target practice the following day at the same Palm Beach county wildlife management area used on July 9, 2016.
8. On or about July 16, 2016, JACKSON, Christian, the CHS, and a known individual, drove to the target practice location. Hubbard was not present. While en route, JACKSON and Christian realized they did not have enough ammunition. JACKSON said that Hubbard still had the ammunition left over from the last shooting session. JACKSON and the known individual then went inside a Wal-Mart where JACKSON purchased additional ammunition while Christian and the CHS remained in the vehicle. During the drive to the wildlife management area, Christian spoke about ISIL training people and sending them back to their homelands to conduct attacks. Christian opined that it hurts the enemies of ISIL more to attack their homelands than to kill them on the battlefield. Upon arrival at the shooting location, JACKSON brought out the same weapons used during the firearms training held on or about July 9, 2016. JACKSON also provided paper targets. JACKSON described his Mosin Nagant sniper rifle as accurate up to one mile and noted



that he intends to use it "when the time comes." Both JACKSON and Christian provided firearms instruction to the CHS, describing how accurate the weapons were and demonstrating the proper position for handling and firing them.

9. On or about July 21, 2016, JACKSON drove Hubbard and the CHS from West Palm Beach to Miami International Airport so that Hubbard and the CHS could depart on the beginning of their trip to Syria. After JACKSON dropped them off, Hubbard and the CHS obtained their boarding passes at the ticket counter. Hubbard and the CHS cleared through the TSA checkpoint at which point Hubbard was arrested. JACKSON was arrested later that same day in Lake Worth, Florida on his way back from Miami International Airport.

BENJAMIN G. GREENBERG  
ACTING UNITED STATES ATTORNEY

Date: 4/4/17

By: \_\_\_\_\_

Edward C. Nucci  
EDWARD C. NUCCI

ASSISTANT UNITED STATES ATTORNEY

Date: 3-30-17

Julie Vianale  
JULIE VIANALE

ATTORNEY FOR DEFENDANT

Date: 3-30-17

Darren Arness Jackson  
DARREN ARNESS JACKSON  
DEFENDANT