

ammunition.

7. In or between December 2017 and August 2018 in Taos County, in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUIJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** established a residence under the leadership of **JANY LEVEILLE** and in accordance with her religious prophecies.

8. In or between December 2017 and August 2018 in Taos County, in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUIJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** possessed and discharged firearms as part of their common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY LEVEILLE**'s religious prophecies.

9. In or between December 2017 and August 2018 in Taos County, in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUIJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** established a training camp and firing range at which **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUIJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** and minor children engaged in firearms and tactical training as part of their common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY LEVEILLE**'s religious prophecies.

10. In or between December 2017 and August 2018 in Taos County in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUIJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON**, and others known and unknown to the Grand Jury, stored firearms and ammunition as part of their common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY**

LEVEILLE's religious prophecies.

11. In or between December 2017 and August 2018 in Taos County in the District of New Mexico, and elsewhere, **JANY LEVEILLE** and **SIRAJ IBN WAHHAJ**, and others known and unknown to the Grand Jury, sought to recruit and train persons, including minor children, to be prepared to engage in jihad and train an army of jihad and to die as martyrs as part of the common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY LEVEILLE's** religious prophecies.

12. In or between December 2017 and August 2018, in Taos County in the District of New Mexico, **SIRAJ IBN WAHHAJ** and **HUJRAH WAHHAJ**, and others known and unknown to the Grand Jury, provided **JANY LEVEILLE** possession of firearms they had purchased.

All in violation of 18 U.S.C. § 371.

Count 2

In or between December 2017 and August 2018, in Taos County, in the District of New Mexico, the defendant, **JANY LEVEILLE**, being an alien illegally and unlawfully in the United States, knowingly possessed, in and affecting commerce, firearms and ammunition.

In violation of 18 U.S.C. §§ 922(g)(5) and 2.

A TRUE BILL:

/s/ _____
FOREPERSON OF THE GRAND JURY

K. Brawley
Assistant United States Attorney

cc: AK
08/22/2017 3:47 p.m.