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2019 APR 9 PM 3:53

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Ibraheem Izzy Musaibli,
aka Abu Shifa Musaibli,
aka Abu 'Abd Al-Rahman Al-Yemeni,
aka Abu Abdallah Al Yemeni,
aka Abdallah Umar Al-Salih,
aka Ibraheem 'Izd 'Umar Salih Musaibad,

Defendant.

Case No. 2:18-20495
Hon. David M. Lawson
VIO: 18 U.S.C. § 2339B
18 U.S.C. § 924(c)
18 U.S.C. § 2339D

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

PROVIDING AND ATTEMPTING TO PROVIDE MATERIAL SUPPORT TO
A DESIGNATED FOREIGN TERRORIST ORGANIZATION

In or about April 2015, and continuing through in or about June 2018, in the Eastern District of Michigan and within the extraterritorial jurisdiction of the United States, IBRAHEEM IZZY MUSAIBLI, aka ABU SHIFA MUSAIBLI, aka ABU 'ABD AL-RAHMAN AL-YEMENI, aka ABU ABDALLAH AL YEMENI, aka ABDALLAH UMAR AL-SALIH, aka IBRAHEEM 'IZD 'UMAR

SALIH MUSAIBAD, a United States citizen who last resided in the Eastern District of Michigan, and who was first indicted in the Eastern District of Michigan, did knowingly provide and attempt to provide material support and resources in the form of personnel (namely, himself) and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham (“ISIS”), which, at all times relevant to this First Superseding Indictment, was designated by the United States Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated foreign terrorist organization and that ISIS engages and has engaged in terrorist activity and terrorism.

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

COUNT TWO

CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO A FOREIGN TERRORIST ORGANIZATION

Beginning in or about October 2015, and continuing through in or about June 2018, and within the extraterritorial jurisdiction of the United States, the defendant, IBRAHEEM IZZY MUSAIBLI, aka ABU SHIFA MUSAIBLI, aka ABU ‘ABD AL-RAHMAN AL-YEMENI, aka ABU ABDALLAH AL YEMENI, aka ABDALLAH UMAR AL-SALIH, aka IBRAHEEM ‘IZD ‘UMAR SALIH MUSAIBAD, a United States citizen who last resided in Dearborn, Michigan, and who was first indicted in the Eastern District of Michigan, did

knowingly conspire with others to provide material support and resources in the form of personnel and services, to a foreign terrorist organization, to wit, ISIS, which, at all times relevant to this First Superseding Indictment, was designated by the United States Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated foreign terrorist organization and that ISIS engages and has engaged in terrorist activity and terrorism.

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

COUNT THREE

POSSESSING AND DISCHARGING A FIREARM (MACHINE GUN) IN FURTHERANCE OF A CRIME OF VIOLENCE

Beginning in or about October 2015, and continuing through in or about June 2018, the defendant IBRAHEEM IZZY MUSAIBLI, aka ABU SHIFA MUSAIBLI, aka ABU 'ABD AL-RAHMAN AL-YEMENI, aka ABU ABDALLAH AL YEMENI, aka ABDALLAH UMAR AL-SALIH, aka IBRAHEEM 'IZD 'UMAR SALIH MUSAIBAD, did knowingly and unlawfully possess a firearm, to wit, a machine gun, and discharge a firearm, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit, providing material support to ISIS, as set forth in Count One of this Superseding Indictment.

(All in violation of Title 18, United States Code, Section 924(c)(1)(A), (B)(ii).)

COUNT FOUR

RECEIPT OF MILITARY-TYPE TRAINING FROM A FOREIGN TERRORIST ORGANIZATION (ISIS)

From at least in or about October 2015, through in or about February 2016, within the extraterritorial jurisdiction of the United States, IBRAHEEM IZZY MUSAIBLI, aka ABU SHIFA MUSAIBLI, aka ABU ‘ABD AL-RAHMAN AL-YEMENI, aka ABU ABDALLAH AL YEMENI, aka ABDALLAH UMAR AL-SALIH, aka IBRAHEEM ‘IZD ‘UMAR SALIH MUSAIBAD, a United States citizen who last resided in Dearborn, Michigan, and who was first indicted in the Eastern District of Michigan, did knowingly receive military-type training from and on behalf of ISIS, which, at all times relevant to this First Superseding Indictment, was designated by the United States Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated foreign terrorist

organization and that ISIS engages and has engaged in terrorist activity and terrorism.

(All in violation of Title 18, United States Code, Sections 2339D(a).)

THIS IS A TRUE BILL

s/GRAND JURY FOREPERSON
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
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Dated: April 9, 2019

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United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 18-20495
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>W</u>

Case Title: USA v. Ibraheem Izzy Musaibli

County where offense occurred : within the extraterritorial jurisdiction of the U.S.

Check One: Felony Misdemeanor Petty

____ Indictment/____ Information --- no prior complaint.
 ____ Indictment/____ Information --- based upon prior complaint [Case number: _____]
 Indictment/____ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 18-20495 Judge: David M. Lawson

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
Ibraheem Izzy Musaibli	18 U.S.C. § 2339B 18 U.S.C. § 924(c) 18 U.S.C. § 2339D	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

4/9/19
Date



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Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.