

## CONTINUATION SHEET FOR CRIMINAL COMPLAINT

I, Peter C. Jolliffe, being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of a Complaint charging **MOHAMUD ABDIKADIR MUSE (MUSE)**; his brother, **MUSE ABDIKADIR MUSE (MM)**; and their brother-in-law/cousin, **MOHAMED SALAT HAJI (HAJI)**; with conspiring to provide material support or resources to a designated foreign terrorist organization; to wit: ISIS - in violation of 18 U.S.C. § 2339B, between in or about October 30, 2018 and on or about January 21, 2019, in the Western District of Michigan and elsewhere.
2. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been employed as a federal investigator for nine years. As a Special Agent with the FBI, my duties include the investigation of alleged violations of federal criminal laws, including terrorism offenses.
3. The information contained in this affidavit comes from my personal observations, my training and experience, and information provided to me by other law enforcement officers who have participated in this investigation. This affidavit is intended to articulate sufficient probable cause to support charges in the complaint and does not represent all of the information and evidence gathered in this case.

### PROBABLE CAUSE

4. Title 18, United States Code, Section 2339B, prohibits, in pertinent part, a person from knowingly providing material support or resources to a foreign terrorist organization, or attempting or conspiring to do the same.
5. The term “material support or resources” means any “property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel..., and transportation, except medicine or religious materials.” 18 U.S.C. Section 2339A(b)(1) and Section 2339B(g)(4).
6. 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.

7. 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 also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (ISIS – which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.
8. MUSE is a 23-year-old male, who was born in Kenya and is a derivative U.S. citizen. MM is a 20-year-old male and the younger brother of MUSE; he too was born in Kenya and is a derivative U.S. citizen. HAJI is a 26-year-old male and is the brother-in-law of MUSE and MM. He was also born in Kenya and is a naturalized U.S. citizen. MUSE, MM and HAJI all reside in Lansing, MI, within the Western District of Michigan.
9. In or about April of 2016, Facebook account “Mohamud A Musa” (FB Account-Muse #1) came to the attention of the FBI based on material that was posted on the account’s publicly viewable pages. The initial FBI review of FB Account-Muse # 1 revealed frequent posts of photos, videos, and statements and commentary that were pro-ISIS in nature and what can be described as violent, extremist propaganda. In or about the Fall of 2016, FBI analysis of certain photos posted to FB Account-Muse #1 led to former Omaha, Nebraska resident MUSE. In August 2016, MUSE was issued a Michigan driver’s license reflecting a Lansing, Michigan address. MUSE’s Facebook verified phone number contains an account birth date that links to MUSE’s actual birth date.
10. On or about June 21, 2017, an undercover FBI employee (UCE-1), posing as an ISIS recruiter, communicated with MUSE via FB Account-Muse #1. In their initial exchanges, MUSE told UCE-1 that he wanted to join ISIS in Raqqa, Syria, that he was saving his money to pay for the trip to Syria, that he had a valid U.S passport, and that he planned to die with a gun in his hand fighting for ISIS. Agents later verified that MUSE did have a valid passport, with an expiration date

in 2022. Approximately a month later, Facebook suspended FB Account-Muse #1, in July 2017.

11. In or about early August of 2017, Facebook account “Abu Usama” (FB Account-Muse #2) came to the attention of the FBI. FBI review of FB Account-Muse #2’s publicly viewable pages revealed similar posts of pro-ISIS and violent extremist propaganda. A closer analysis of certain photos posted to FB Account-Muse #2 suggested MUSE was the user of FB Account-Muse #2. On or about August 29, 2017, UCE-1, posing as the same ISIS recruiter, communicated with FB Account-Muse #2. The online exchange was consensually monitored by the FBI. In summary, MUSE confirmed that his prior Facebook account was disabled by Facebook and that he was continuing to save money to travel to join ISIS and fight on their behalf in Syria.
12. On or about September 13, 2017, the United States District Court, Western District of Michigan, issued a Search Warrant to Facebook for information associated with FB Account-Muse #1. Based on an analysis of the returns, investigators identified communications from in or about January of 2017 to in or about June 2017, between MUSE and FB Account-Haji. These exchanges documented their shared support for ISIS and their desire to fight for this Designated Foreign Terrorist Organization. FBI review of FB Account-Haji’s publicly viewable user profile information revealed a user profile picture and numerous other posted photographs that were subsequently identified as HAJI. An example of their online exchanges includes on the following: On or about January 19, 2017, HAJI wrote to MUSE asking for additional ISIS videos. HAJI went on to write that he liked how ISIS burned people, “I love it man.” On or about January 20, 2017, HAJI wrote to MUSE, “Haha he but that guy who was threaten he put put fuel on That dude while his burning that was funny dude.” Facebook suspended FB Account-Muse #2 in October 2017.
13. On or about February 8, 2018, the United States District Court, Western District of Michigan, issued a Search Warrant for information associated with FB Account-Muse #2. An analysis of the returns from this search led to the discovery of numerous exchanges between MUSE and MM, from August to October 2017, discussing their support of ISIS and the ideals for which the group stood. FBI review of FB Account-MM’s publicly viewable user profile information revealed the account holder as residing in Lansing, Michigan and contained a photograph that was later confirmed to be MM. A check confirmed that MM was issued a U.S. passport in September 2012 but it had expired in September 2017.

14. On or about May 22, 2018, the United States District Court, Western District of Michigan, issued a Search Warrant to Facebook for information associated with FB Account-MM. An analysis of the returns revealed numerous exchanges between MM and FB Account-Haji, from at least in or about November of 2017 to in or about May of 2018. Similarly, these exchanges also confirmed that the two shared a desire to fight for ISIS and a knowledge of ISIS's presence in Somalia. Some of their online conversations focused on specific acts of violence against non-believers. On or about November 1, 2017, MM sent HAJI a screen capture of the Tribeca truck attack in New York City that occurred on October 31, 2017. HAJI wrote, "Real civil war" and MM responded that if this did not wake the people up nothing would. HAJI responded, "Yeahh I'm ready inshAllah [Arabic phrase for God Willing]...This is a call for hijra<sup>1</sup>. We can't live here I'm trynna plan for hijra now." MM then wrote, "You have spoken the truth, just wait on the opportunity. It will present itself if we are truthful. But know right it's gonna require some type of sacrifice." On or about March 28, 2018, HAJI sent a picture of a slaughtered goat to MM and added, "Next time I want to catch kuffar [Arabic word for non-believer] and do my jihad training on them...That will be in Dowla [Arabic word for ISIS]..."
15. On or about August 28, 2018, the United States District Court, Western District of Michigan, issued a Search Warrant to Facebook for information associated with FB Account-Haji. A further analysis identified communications from at least in or about June of 2018 to in or about August of 2018, between HAJI and FB Account-MM. Again their communications reiterated their desire to fight for ISIS and support for the killing of non-believers; as an example on or about July 5, 2018, HAJI wrote to MM, "Kuffar [Arabic word for non-believers] I want to kill one inshaAllah [Arabic phrase for God willing] one day," followed by "my days are coming I want alot of this kuffar [Arabic word for non-believers] dead." MM replied, "Same here akhi" [Arabic word for brother].
16. On or about October 17, 2018, the United States District Court, Western District of Michigan, issued a Search Warrant for information associated with FB Account-MM. Communications between MM and FB Account-Haji from August of 2018 to in or about October of 2018 were identified that continued in the same vein. On or about August 31, 2018, MM and HAJI exchanged a series of communications about MM's ability to drive in the context of using the vehicle as a weapon for a planned attack; HAJI wrote, "mashaAllah [Arabic phrase for It

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<sup>1</sup> In the context of extremism, hijrah is the Arabic phrase/concept for a foreign fighter's journey from his/her country of origin to join and fight in terrorist-held territories abroad.

was God's will] that's good so u can drive that stashahadi [Arabic word for martyrdom] car right Alhamdulillah" [Arabic phrase for Praise be to God]. MM replied, "Yes Inshallah" [Arabic phrase for God willing]. HAJI then wrote, "On this Kufarr" [Arabic word for non-believers] and "Wallahi [Arabic phrase for I swear to God] I'm ready to meet Allah." HAJI wrote, "InshaAllah [Arabic phrase for God willing] they will jus kno a car pass by for istashahadi [Arabic word for martyrdom] operation."

17. In or about October of 2018, undercover FBI employee # 2 (UCE-2), was introduced into the investigation. UCE-2 established a Facebook account with a persona of a Somali male, physically located in Somalia. On or about October 11, 2018, UCE-2 sent a written FB communication to FB Account-MM, regarding the situation in Somalia. On or about October 18, 2018, MM responded to UCE-2 in an FB communication that stated MM hoped Allah would remove the suffering that the Muslims of Somalia were going through. MM then wrote, "I plan in doing hijrah to Somalia and joining those who are establishing the sharia [Arabic word for Islamic law] of Allah."
18. In or about October of 2018, undercover FBI employee # 3 (UCE-3) was also introduced into the investigation. UCE-3 established an FB account, with the profile of African-American male convert to Islam, physically located in Chicago, Illinois. In or about early October of 2018, UCE-3 and FB Account-Haji exchanged communications about being a Muslim in the USA and became FB friends. From in or about the remainder of October of 2018 to in or about early December of 2018, UCE-3 and HAJI exchanged a series of communications in which HAJI revealed his support for ISIS and desire to make hijrah and engage in Jihad.
19. On or about October 30, 2018, the following communications were exchanged between UCE-2 and FB Account-MM: MM wrote that he wanted to travel to Somalia to make his bayah [Arabic word for oath/pledge of allegiance] to ISIS and "fight in the front lines." MM told UCE-2 that he would be able to save enough money to travel to join ISIS, in about six to eight months. UCE-2 cautioned MM that specific steps needed to be followed before he would be able to join ISIS. Some of these steps included making bayah [Arabic word for oath/pledge of allegiance] to ISIS and tazkiyah [Arabic phrase for concept of ISIS vetting] of MM. These exchanges culminated in MM agreeing to making his pledge in Arabic, and send the video file to UCE-2 to convey to ISIS leadership for their acceptance.

20. On or about November 1, 2018, UCE-2 and FB Account-MM further discussed the planned trip including the fact that he would need to renew his passport and assumed a timeline of 4 weeks for that process to take place. MM also indicated that he has strong support from his brother and his cousin/brother-in law, who feel like he does about ISIS.
21. On or about November 7, 2018, MM using FB Account-MM sent a video file to UCE-2 containing his oath to ISIS. MM told UCE-2 that his cousin Haji speaks some Arabic and helped him with the words of the oath. Approximately two days later, on or about November 9, 2018, UCE-2 confirmed that he presented the oath video to ISIS leadership in Somalia on MM's behalf and it was accepted.
22. On or about November 11, 2018, UCE-2 and MM exchanged communications using FB Account-MM. MM wrote that "one" of his local ISIS supporting brothers was also planning to make his oath to ISIS, telling UCE-2 that it was his belief that the others who were with him did not have any doubts and "I know that if I leave they won't stay behind." MM then wrote, "I've come this far I'm not letting the kuffar [Arabic word for non-believers] stop me now, wallahi [Arabic phrase for I swear to Allah] I never go to jail, it's either hijrah or shahadah [Arabic phrase for the death of a martyr]."
23. On or about November 13, 2018, UCE-2 and MM via FB Account-MM #2 exchanged communications. MM wrote, "Akhi [Arabic word for brother] me and my brother made another Facebook but we didn't get the chance to do bayah, it's only 2 of them, but by Friday inshallah" [Arabic phrase for God willing]. MM wrote that one of the local ISIS supporting brothers chose the kunya name "Abu Usamah Al Muhajir, but the other akhi [Arabic word for brother] hasn't chosen yet." For kunya name "Abu Usamah Al Muhajir," MM advised the FB account is "Abu Osama" [FB Account-Muse #3]. Regarding FB account "Abu Osama" [FB Account-Muse #3], MM wrote that his brother "just got married"; "is in contact with another mujahid [Arabic word for one who engages in Jihad][UCE-1] from another wilayah" [Arabic word/concept for ISIS province]; and is the one who told MM about "dawlah" [Arabic word for ISIS].
24. On or about November 15, 2018, UCE-2 and MM via FB Account-MM #2 exchanged communications. Reiterating his desire to travel, MM broached the subject of needing financial support to purchase his ticket to travel to Somalia. Two days later, MM using FB Account-MM #2 sent UCE-2 two video files containing the oath of allegiance to ISIS by MUSE and HAJI, along with their contact information.

25. On or about November 19, 2018, UCE-2 contacted FB Account-Haji #2 to confirm that he (UCE-2) had received Haji's oath to ISIS, to which HAJI later wrote, "And I have family akhi [Arabic word for brother] I'm going to give them warnings then I'll make my hijrah inshaAllah" [Arabic phrase for God willing].
26. On or about December 6, 2018, the following was exchanged between UCE-2 and FB Account-Haji #2: HAJI tells UCE-2 that he is assessing another person that wants to join ISIS, including one that lives outside his area but is committed and has money to travel [UCE-3]. HAJI talked about making "an account" for this person [UCE-3], if/when HAJI is fully comfortable with him. HAJI wrote that he is trying "my best inshaAllah [Arabic phrase for God willing] to make a way out of any ikhwa [Arabic word/concept for ISIS fighting brothers] of ours who loves the Dowla [Arabic word for ISIS] and have the wealth to leave this disgusting place..." HAJI went on to write that he just has to save his money in order to join ISIS in Somalia.
27. On or about December 6-7, 2018, UCE-3 and FB Account-Haji exchanged communications, with HAJI asking UCE-3 for a face-to-face meeting; they agreed to meet on Friday, December 14, 2018.
28. On or about December 11, 2018, UCE-3 and FB Account-Haji communicated, with HAJI sending UCE-3 the written Arabic language ISIS oath and an audio file of himself reciting the ISIS pledge in Arabic. HAJI reminded UCE-3 of their plans to meet on Friday, December 14, 2018. HAJI and UCE-3 agreed to meet in Benton Harbor, Michigan.
29. On or about December 11-12, 2018, MUSE communicated with UCE-2 using FB Account-Muse #3. In their conversation MUSE wrote that "Abu Ali al muhajir" [the name MM chose as his kunya or ISIS fighter name, revealed by MM from FB Account-MM to UCE-2 on November 5, 2018] knows MUSE's full understanding of "dawlah" [Arabic word for ISIS]. MUSE wrote, "I was supporting dowla [Arabic word for ISIS] in my family before anyone did." MUSE wrote that he married in June of last summer but his wife knows of his desire to join ISIS and is willing to come with him. MUSE wrote that he is saving money to pay for "hijrah" soon. MUSE closed this exchange with the following: "Brother I just want Islam to win I want to kill kuffar" [Arabic word for non-believers].
30. On or about December 14, 2018, HAJI and MM met with UCE-3 in Benton Harbor, Michigan. Both MM and HAJI coached UCE-3 through the verbal recitation of the oath as HAJI recorded it. During the course of their

conversations, MM stated if he was unable to make hijrah, he would take a car and run down “kuffar” [non-believers], like what happened in France. HAJI and MM stated if they were unable to make hijrah, Allah commanded that martyrdom is the only option.. On or about December 14, 2018, MM, via FB Account-MM #2, submitted UCE-3’s oath video to UCE-2.

31. On or about December 17, 2018, the following was exchanged between UCE-2 and FB Account-Muse #3: MUSE wrote that his wife is pregnant and due to give birth in March. MUSE wrote that he would travel to Somalia to join ISIS soon after the birth of his child.
32. On or about December 17, 2018, the U.S. Department of State received an application in MM’s name for a U.S. passport. That same day MM conveyed to UCE-2 that he and UCE-3 were looking for available flights and the costs associated with their travel. Later that day, HAJI using FB Account-Haji #2 contacted UCE-2 asking for financial assistance to enable MM to travel.
33. On or about December 18, 2018, MM, via FB Account-MM #2 sent a link of available flights from Chicago, Illinois to Mogadishu, Somalia to UCE-3. MM wrote, “It could be very soon that we are in Somalia” and “the other two who should be coming with me [MM] have family that they need to make sure are safe so there being little more cautious with these steps, me I’m just ready to leave as soon as I get that passport.”
34. On or about December 20-21, 2018, the following was exchanged between UCE-3 and FB Account-MM #2: MM stated to UCE-3 that his passport should arrive next week. MM stated that if he and UCE-3 both receive their passports before January 21, 2019, that he and UCE-3 can leave before then. MM requested help from UCE-3 searching for a flight and told UCE-3 to look for a route from Turkey to Djibouti to Mogadishu. MM and UCE-3 exchanged communications about cheaper flights originating from Grand Rapids Airport with a route consisting of Orlando, Stockholm, Dubai, Hargesia to Mogadishu, at a cost of approximately \$1,799 per person. MM stated that as long as he and UCE-3 “arrive in Mogadishu, it’s cool.” MM told UCE-3 that when the passports arrive and tickets are purchased, that these will be the “proof of sincerity” to the mujahedeen. MM stated he had \$500 to contribute toward the airline ticket cost. MM advised the ticket cost was “disheartening” and that he was “disappointed” at the price of the ticket per person. MM told UCE-3 that MM told the “mujahid” [UCE-2] that MM needed \$1,200 for the airfare and that MM can come up with \$300 more.



35. On or about December 21, 2018, FB Account-MM #2 wrote to UCE-2: "Me and the ikhwa [UCE-3] have found a ticket, the route is 2 American cities, Dubai and then Mogadishu. The date is for the 21st of next month but if the passports arrives before then we will try to move it up." MM advised the airfare cost was "\$1799" per person; MM requested "\$1200" from ISIS to pay for it and that MM could pay the rest.
36. In addition to the funds that MM stated he could contribute to the cost of an air ticket to Somalia, U.S. government funds in the amount of \$1,200 were procured by the FBI on or about December 2018 to send in \$300 increments through MM, HAJI, MUSE, and UCE-3 to aid MM to purchase his air ticket to Somalia, with the funds purportedly being sent from ISIS in response to MM's December 21, 2018 request for assistance.
37. According to U.S. Government records, MM was issued a U.S. passport on or about December 19, 2018; the passport has an expiration date on or about December 18, 2028.
38. On or about January 4, 2019, the following was exchanged between UCE-2 and FB Account-MM #2: MM told UCE-2 that he received the \$300 from ISIS and sent a picture of the three \$100 bills he picked-up. MM wrote, "The rest should be simple inshaAllah [Arabic phrase for God willing] let me know when your sending the money and I'll let the ikhwa [Arabic word/concept for local ISIS fighting brothers]. The information so i buy my ticket and plan for my hijrah." With regard to the MoneyGram transaction, MM referenced the sister-in-law that MM discussed yesterday and wrote, "My sister in law helped me so it was easy." MM then wrote, "But akhi [Arabic word for brother] you are sending the money one person at a time right?" All of the monies were sent via MoneyGram between January 4 and January 5, 2019, with MM, HAJI, MUSE, and UCE-3 each collecting \$300; all of these transactions were recorded.
39. On or about January 7, 2019, MM communicated with UCE-2 that MM advised that he and the other brother [UCE-3] were planning to buy their airline tickets tomorrow, with a scheduled departure date of January 21, 2019. MM wrote, "Thats exactly 14 days from now."
40. On or about January 7, 2019, UCE-2 and HAJI via FB Account-Haji #2 communicated. HAJI stated, "Akhii [Arabic word for brother] by Allah no problem inshaAllah [Arabic phrase for God willing] i will find it and work hard for it ill be coming with Abu Osama [MUSE] at the same time not to long inshaAllah" [Arabic phrase for God willing].

41. On or about January 7, 2019, UCE-2 and MUSE via FB Account-Muse #4 communicated about Salamujahid [HAJI]. MUSE stated, "That's [HAJI] my brother Inlaw"; and "yes we talked and agreed to leave together."
42. On or about January 8-9, 2019, Muse communicated with UCE-2 using FB Account-MM #2. MM told UCE-2 that MM and UCE-3 purchased their airline tickets and sent images of his travel itinerary, which reflected passenger "Mr Muse Abdikadir Muse;" payment summary total price \$1,749; departure on or about January 21, 2019 from Grand Rapids, Michigan, at Gerald R. Ford International Airport, via a series of connections to arrive in Mogadishu, Somalia, on or about January 23, 2019.
43. On or about January 10, 2019, the U.S. Department of State received an application in MM's name for a U.S. passport. This application was accompanied by a U.S. Department of State form titled, "STATEMENT REGARDING A LOST OR STOLEN U.S. PASSPORT BOOK AND/OR CARD." Said form stated on or about December 22, 2018, "BOOK: MY PASSPORT BOOK ARRIVED ALONG WITH MY OLD. I PLANNED TO THROW ONE OUT AND ENDED UP THROWING THE WRONG ONE OUT." The form bore MM as the signatory, dated on or about January 2, 2019.
44. According to U.S. Government records, MM was issued a replacement U.S. passport on or about January 14, 2019; the passport has an expiration date on or about January 13, 2029.
45. On or about January 15, 2019, MM and HAJI met with UCE-3 at a Walmart store in Lansing, MI. The meeting was consensually monitored by the FBI. MM, HAJI, and UCE-3 shopped together at the Walmart and discussed items for MM and UCE-3's upcoming trip to join ISIS in Somalia. MM selected a pair of black combat-style boots, which UCE-3 purchased for MM at a retail price of approximately \$20.00. MM and HAJI told UCE-3 that if they failed in their attempt to join ISIS, they would conduct an attack or martyrdom operation. During this exchange, MM referenced a terrorism attack in Paris.
46. On or about January 21, 2019, MUSE, MM, and HAJI traveled together, by vehicle – a Toyota Matrix – from Lansing, Michigan, to Gerald R. Ford International Airport, in Grand Rapids, Michigan. MUSE was driving and parked the vehicle in short-term parking at the airport. MUSE, MM, and HAJI entered the departure terminal together. MM proceeded to the airline ticket counter, obtained a boarding pass for his scheduled flight, checked one bag, and proceeded to the Transportation Security Administration (TSA) security checkpoint. As MM

was completing the TSA security process, MM was arrested in the airport terminal by law enforcement officers. Shortly thereafter, MUSE and HAJI were arrested in the airport terminal by law enforcement officers.

47. Based on the foregoing, I respectfully submit that there is probable cause to believe that between in or about October 30, 2018 and on or about January 21, 2019, in the Western District of Michigan and elsewhere, MUSE, MM, and HAJI engaged in a conspiracy to provide material support or resources to a designated foreign terrorist organization – ISIS – in violation of 18 U.S.C. § 2339B.