

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CRIMINAL NO. 04-29 (JRT/FLN)

UNITED STATES OF AMERICA,)	
)	SUPERSEDING INDICTMENT
Plaintiff,)	
)	(18 U.S.C. § 2339B)
v.)	(18 U.S.C. § 1001(a)(2))
)	
MOHAMMED ABDULLAH WARSAME,)	
a/k/a "Abu Maryam,")	
a/k/a "Abu Zaynab,")	
)	
Defendant.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Provide Material Support and Resources
to a Designated Foreign Terrorist Organization)

In or about March 2000 and continuing through at least
December 8, 2003, in the State and District of Minnesota and
elsewhere, the defendant,

MOHAMMED ABDULLAH WARSAME,
a/k/a "Abu Maryam,"
a/k/a "Abu Zaynab,"

did knowingly conspire, combine, confederate and agree together
with other persons both known and unknown to the Grand Jury, within
the United States and subject to the jurisdiction of the United
States, to provide material support and resources, as that term is
defined in Title 18, United States Code, Section 2339A(b), to a
foreign terrorist organization, namely al Qaeda, which was
designated by the United States Secretary of State as a foreign
terrorist organization on October 8, 1999, and redesignated on

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JUN 21 2005

FILED _____
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTD _____
DEPUTY CLERK _____

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October 5, 2001, and again on October 2, 2003; in violation of Title 18, United States Code, Section 2339B.

COUNT 2

**(Providing Material Support and Resources
to a Designated Foreign Terrorist Organization)**

In or about March 2000, up to and including December 8, 2003, in the State and District of Minnesota and elsewhere, the defendant,

**MOHAMMED ABDULLAH WARSAME,
a/k/a "Abu Maryam,"
a/k/a "Abu Zaynab,"**

did knowingly, within the United States and subject to the jurisdiction of the United States, provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, namely al Qaeda, which was designated by the United States Secretary of State as a foreign terrorist organization on October 8, 1999, and redesignated on October 5, 2001, and again on October 2, 2003; in violation of Title 18, United States Code, Section 2339B.

COUNT 3

(False Statement)

On or about December 8, 2003, in the State and District of Minnesota, in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency within the executive

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branch of the United States, that is, an international terrorism investigation, the defendant,

**MOHAMMED ABDULLAH WARSAME,
a/k/a "Abu Maryam,"
a/k/a "Abu Zaynab,"**

did knowingly and willfully make a false material statement and representation, in that the defendant stated that since 1995 he had only traveled to Saudi Arabia and Somalia and had engaged in no other foreign travel, whereas, in truth, from 2000 through 2001, the defendant had traveled to Pakistan and Afghanistan for the purpose of attending military training camps and participating in combat, and the defendant also then traveled to Pakistan and London, England, where he met with associates from Afghanistan before he returned to Canada and the United States; all in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 4
(False Statement)

On or about December 8, 2003, in the State and District of Minnesota, in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency within the executive branch of the United States, that is, an international terrorism investigation, the defendant,

**MOHAMMED ABDULLAH WARSAME,
a/k/a "Abu Maryam,"
a/k/a "Abu Zaynab,"**

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did knowingly and willfully make a false material statement and representation, in that the defendant stated that, after he left Afghanistan, he did not have any subsequent contact with the associates he met while attending military training camps in Afghanistan, whereas, in truth, the defendant did maintain frequent contact with such associates who had themselves re-located to Canada, Pakistan, and elsewhere throughout the world; all in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 5
(False Statement)

On or about December 8, 2003, in the State and District of Minnesota, in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency within the executive branch of the United States, that is, an international terrorism investigation, the defendant,

MOHAMMED ABDULLAH WARSAME,
a/k/a "Abu Maryam,"
a/k/a "Abu Zaynab,"

did knowingly and willfully make a false material statement and representation, in that the defendant stated that after returning to Canada from Afghanistan, he did not send money and/or financial support back to associates he met while attending military training camps in Afghanistan, whereas in truth, the defendant collected and then transmitted by wire approximately \$2,000 to such an associate

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who was then located in Pakistan; all in violation of Title 18,
United States Code, Section 1001(a) (2).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON