

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2015 JUL 21 PM 3:40

DEPUTY CLERK



UNITED STATES OF AMERICA

v.

BILAL ABOOD

No. 3:15-CR-256-K
SUPERSEDES INDICTMENT
RETURNED JUNE 10, 2015

SUPERSEDING INDICTMENT

The Grand Jury Charges:

Foreign Terrorist Organizations

On October 15, 2004, the United States Secretary of State designated Al-Qaida 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.

On December 11, 2012, the Secretary of State amended the Foreign Terrorist Organization (FTO) and Executive Order 13224 designations of AQI to include the following new aliases: al-Nusra Front, Jabhat al-Nusra, Jabeheet al-Nusra, The Victory Front, and Al-Nusra Front for the People of the Levant (ANF).

On October 4, 2011, Ibrahim 'Awwad Ibrahim 'Ali al-Badri, also known as Abu Du'a, also known as Abu Bakr al-Baghdadi, was designated as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. Abu Bakr al-Baghdadi is

the self-proclaimed leader of the Islamic State of Iraq and the Levant (ISIL).

On May 15, 2014, the Secretary of State amended the designation of AQI 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 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, 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. To date, ISIL remains a designated FTO.

In addition, on May 15, 2014, the Secretary of State, in response to the evolving nature of the relationships between ANF and AQI, amended the FTO designation of AQI to remove all aliases associated with al-Nusra Front. Separately, the Secretary of State then designated al-Nusra Front, also known as Jabhat al-Nusra, also known as Jabhet al-Nusra, also known as The Victory Front, also known as Al-Nusra Front for the People of the Levant, also known as Al-Nusra Front in Lebanon, also known as Support Front for the People of the Levant, and also known as Jabaht al-Nusra li-Ahl al-Sham min Mujahedi al-Sham fi Sahat al-Jihad, as a Foreign Terrorist Organization 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. ANF remains designated as an FTO.

Background

Numerous individuals within the United States have traveled or have attempted to travel to Syria in order to involve themselves in the fighting that has consumed Syria for more than three years. A variety of armed groups are operating in Syria, including groups that are fighting against the Syrian regime led by President Bashar Al Assad. The Free Syrian Army (FSA) formed as a secular opposition force to fight the Assad regime. In addition, terrorist groups are involved in the fighting in Syria and Iraq, including ISIL (formerly known as AQI) and ANF.

Facts of the Investigation

Bilal Abood is an Iraqi-born naturalized United States citizen, who migrated to the United States in 2009. He speaks fluent English and Arabic. On March 29, 2013, Abood attempted to depart the United States at Dallas Fort Worth International Airport (DFW), but was denied boarding on an international flight. At the airport, Federal Bureau of Investigation (FBI) agents interviewed Abood and asked about his travel plans. Abood stated that he was merely planning to travel to Iraq to visit with family and that he did not understand why he was prohibited from flying on that date.

On April 4, 2013, in Mesquite, Texas, FBI agents interviewed Abood again. They asked Abood if on March 29, 2013, at DFW airport, he intended to go to Syria to fight. Abood stated he did not. Later in the interview, Abood admitted that his intent on March 29, 2013, was to go to Syria to fight Assad's regime. Abood claimed he wanted to fight with the Free Syrian Army (FSA).

On or about April 17-19, 2013, the FBI learned that Abood was in San Antonio, Texas, planning to leave the United States to go and fight in Syria. A confidential human source (CHS) reported that Abood was watching Al-Qaida videos on social media, along with videos about the creation of ISIL. The videos referenced ISIL's leader, Abu Bakr al-Baghdadi, and discussed ANF's obedience to orders given by Al-Qaida. Abood told the CHS he wanted to help build the Islamic State of Iraq.

On or about April 29, 2013, Abood left the United States through Mexico and traveled through various countries into Turkey. From there, Abood entered Syria.

On September 16, 2013, upon Abood's return to the United States, the FBI interviewed him. Abood admitted traveling to Syria through Turkey, and claimed he went there to fight with the FSA. He described his trip to Deir Ezzour (Syria), and he claimed to have stayed in a FSA camp, but also claimed that the FSA and ANF actively collaborated in achieving objectives, exchanging equipment, and committing attacks. Abood said he became frustrated with a lack of action, and said he wanted to return to the United States. Abood denied ever providing financial support to ANF, ISIL or any other terrorist organization.

A search warrant was conducted on Abood's computers on July 9, 2014. A review of Abood's computer revealed Abood pledged an oath to Abu Bakr al-Baghdadi, the leader of ISIL, on or before June 19, 2014. The search warrant also revealed Abood had been on the internet viewing ISIS atrocities such as beheadings, and using his twitter account to tweet and retweet information on al-Baghdadi. On or before June 19, 2014,

using the twitter handle “@ibnalislaam,” Abood tweeted, “I pledge obedience to the Caliphate Abu Bakr al-Baghdadi. Here we renew our pledge to the Caliphate Abu Bakr al-Baghdadi come on supporter where is the pledger.” That post was retweeted by others. The twitter account also revealed a tweet by Abood on July 1, 2014, wherein he stated, “Advice from Sheikh al-Hatari to the Elders of Al-Qaida – God save them....”

On April 14, 2015, FBI agents went to Abood’s residence in order to return his computer that was seized in the 2014 search warrant. FBI agents informed Abood they were investigating a matter relating to international terrorism. Abood acknowledged that he understood the nature of the investigation. Abood admitted that he knew it was a crime to lie to a FBI agent, and Abood denied that he had ever pledged allegiance to Abu Bakr al-Baghdadi, the leader of ISIL.

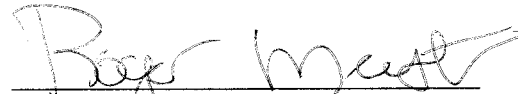
[NO FURTHER INFORMATION ON THIS PAGE]

Count One
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

On or about April 14, 2015, in the Dallas Division of the Northern District of Texas, the defendant, **Bilal Abood**, did knowingly and willfully make and cause to be made materially false, fictitious and fraudulent statements and representations in a matter within the jurisdiction of the Federal Bureau of Investigation, which involved international terrorism (as defined in 18 U.S.C. § 2331), by falsely stating to federal law enforcement agents that he had never pledged allegiance to Abu Bakr al-Baghdadi, the leader of ISIL.

In violation of 18 U.S.C. § 1001.

A TRUE BILL


FOREPERSON

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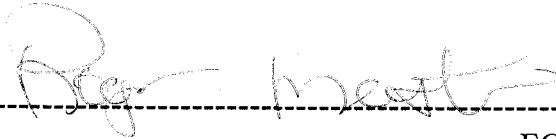
SUPERSEDING INDICTMENT

18 U.S.C. § 1001

False Statement to a Federal Agency

1 Count

A true bill rendered



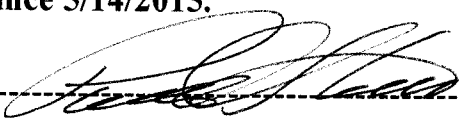
DALLAS

FOREPERSON

Filed in open court this 21st day of July, 2015.

Clerk

In Federal Custody since 5/14/2015.



UNITED STATES DISTRICT/MAGISTRATE JUDGE

Criminal Matter Pending: 3:15-CR-256-K