

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MUSE ABDIKADIR MUSE,
a/k/a ALI ALMUHAJIR,
MOHAMED SALAT HAJI,
a/k/a SALAMUJAHID ALMUHAJIR, and
MOHAMUD ABDIKADIR MUSE,
a/k/a ABU OSAMA ALMUHAJIR,

INDICTMENT

Defendants.

The Grand Jury charges:

COUNT 1

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

Beginning in or about January 2017, and continuing through on or about January 21, 2019,
within the Western District of Michigan, Southern Division, and elsewhere, the defendants,

**MUSE ABDIKADIR MUSE,
a/k/a ALI ALMUHAJIR,
MOHAMED SALAT HAJI,
a/k/a SALAMUJAHID ALMUHAJIR, and
MOHAMUD ABDIKADIR MUSE,
a/k/a ABU OSAMA ALMUHAJIR,**

having knowledge that the Islamic State of Iraq and al-Sham (also known as the Islamic State of Iraq and the Levant, Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Dawla al Islamiya, ISIL, and ISIS) (collectively “ISIS”) is a designated foreign terrorist organization, that ISIS has engaged or engages in terrorist activity, and that ISIS has engaged or engages in terrorism, did knowingly combine, conspire, confederate, and agree together and with each other to provide material support and resources, as that term is defined in Title 18, United

States Code, Section 2339A(b), including personnel, to a foreign terrorist organization, namely, ISIS.

18 U.S.C. § 2339B(a)(1)

COUNT 2

(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about January 21, 2019, within the Western District of Michigan, Southern Division,
the defendants,

**MUSE ABDIKADIR MUSE,
a/k/a ALI ALMUHAJIR,
MOHAMED SALAT HAJI,
a/k/a SALAMUJAHID ALMUHAJIR, and
MOHAMUD ABDIKADIR MUSE,
a/k/a ABU OSAMA ALMUHAJIR,**

having knowledge that the Islamic State of Iraq and al-Sham (also known as the Islamic State of Iraq and the Levant, Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Dawla al Islamiya, ISIL, and ISIS) (collectively “ISIS”) is a designated foreign terrorist organization, that ISIS has engaged or engages in terrorist activity, and that ISIS has engaged or engages in terrorism, and aiding and abetting each other, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel, to a foreign terrorist organization, namely, ISIS.

18 U.S.C. § 2339B(a)(1)

18 U.S.C. § 2

COUNT 3

(False Statement in Passport Application)

On or about January 2, 2019, in Ingham County, in the Western District of Michigan,
Southern Division,

**MUSE ABDIKADIR MUSE,
a/k/a ALI ALMUHAJIR,**

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, in that in such application the defendant attested that he had accidentally thrown out his prior passport issued on or about December 19, 2018, which statement the defendant then and there knew was false.

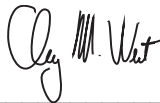
18 U.S.C. § 1542

A TRUE BILL



GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
United States Attorney



CLAY M. WEST
Assistant United States Attorney



CHRISTOPHER M. O'CONNOR
Assistant United States Attorney