

**FILED**

NOV 15 2018 LA

THOMAS G BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ASHRAF AL SAFOO, a/k/a Abu Al'-  
Abbas Al-Iraqi, a/k/a Abu Shanab,  
a/k/a Abbusi

Case No. 18 CR 696

Violation: Title 18, United States  
Code, Section 2339B(a)(1)

**JUDGE BLAKEY**

**MAGISTRATE JUDGE WEISMAN**

The SPECIAL DECEMBER 2017 GRAND JURY charges:

1. At times material to this indictment:

a. On or about October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq, then known as Jam'at al Tawhid wa'al-Jihad, as a foreign terrorist organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

b. On or about May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq 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 to add the alias Islamic State of Iraq and the Levant as its primary name. The Secretary also added the following aliases to the foreign terrorist organization listing: The Islamic State of Iraq and al-Sham, the Islamic State

of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production.

c. On or about September 21, 2015, the Secretary of State added the following aliases to the foreign terrorist organization listing: Islamic State, ISIL, and ISIS.

2. Beginning no later than in or about June 2017, and continuing until at least on or about October 13, 2018, in the Northern District of Illinois, and elsewhere,

ASHRAF AL SAFOO, a/k/a Abu Al'-Abbas Al-Iraqi,  
a/k/a Abu Shanab, a/k/a Abbusi

defendant herein, together with others known and unknown, knowingly conspired to provide material support and resources, namely, personnel to include himself and others, and services, to a foreign terrorist organization, namely, the Islamic State of Iraq and al Sham, knowing that the organization

was a designated foreign terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism;

In violation of Title 18, United States Code, Section 2339B(a)(1).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY