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SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

10CR4645 JM

UNITED STATES OF AMERICA,

Plaintiff,

v.

AHMED NASIR TAALIL MOHAMUD,

Defendant.

Case No. _____

I N D I C T M E N T

Title 18, U.S.C., Sec. 2339A(a) -
Conspiracy to Provide Material
Support to Terrorists; Title 18,
U.S.C., Sec. 2339B(a)(1) -
Conspiracy to Provide Material
Support to Foreign Terrorist
Organization; Title 18, U.S.C.,
Sec. 956 - Conspiracy to Kill in
a Foreign Country; Title 18,
U.S.C., Sec. 1956(h) - Conspiracy
to Launder Monetary Instruments

The grand jury charges:

INTRODUCTORY ALLEGATIONS COMMON TO ALL COUNTS

1. Al-Shabaab is a violent and brutal militia group that uses intimidation and violence to undermine Somalia's Transitional Federal Government (TFG) and its supporters. On or about February 26, 2008, the U.S. Department of State designated "Al-Shabaab" as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act, as amended, and as a Specially Designated Global Terrorist under Section 1(b) of Executive Order 13224, as amended.

WPC:nlv:San Diego
11/17/10

1 Al-Shabaab is also known by the following names, among others: al-
2 Shabab; Shabaab; the Youth; Mujahidin al-Shabaab Movement; the Youth
3 Movement; Mujahidin; MYM; Harakat Shabaab al-Mujahidin; Hizbul
4 Shabaab; Hisb'ul Shabaab; al-Shabaab al-Islamiya; al Shabaab al-Islam;
5 al-Shabaab al-Jihaad; Youth Wing; and "the Unity of Islamic Youth."

6 2. Throughout al-Shabaab's war against the TFG and its
7 Ethiopian and African Union supporters, al-Shabaab has used harassment
8 and targeted assassinations of civilians, improvised explosive
9 devices, rockets, mortars, automatic weapons, suicide bombings, and
10 general tactics of intimidation and violence.

11 3. Until his death on or about May 1, 2008, Aden Hashi Ayrow,
12 aka "Shigalow," aka "Sheikhalow," aka "Muja Dhuub," aka "Slim Limbs,"
13 was a prominent military leader of al-Shabaab. Ayrow called for
14 foreign fighters to join al-Shabaab in a "holy war" against the
15 Ethiopian and other African forces in Somalia. Ayrow's call was
16 echoed by al-Qaeda leadership, including Usama bin Laden and Ayman al-
17 Zawahiri, and fighters from other countries have traveled to Somalia
18 to engage in violent jihad.

19 Count 1

20 CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO TERRORISTS

21 Beginning on a date unknown to the grand jury, and continuing to
22 at least on or about August 5, 2008, within the Southern District of
23 California, and elsewhere, defendant AHMED NASIR TAALIL MOHAMUD did
24 unlawfully and knowingly conspire and agree with Basaaly Saeed Moalin
25 (charged elsewhere), Mohamed Mohamed Mohamud, aka "Mohamed Khadar,"
26 aka "Sheikh Mohamed" (charged elsewhere), and Issa Doreh, aka "Sheikh
27 Issa" (charged elsewhere), and with other persons known and unknown
28 to the grand jury, to provide material support and resources, to wit:

1 currency and monetary instruments, knowing and intending that the
2 material support and resources were to be used in preparation for and
3 in carrying out violations of Title 18, United States Code,
4 Section 956, conspiracy to kill persons in a foreign country, and
5 Title 18, United States Code, Section 2332a(b), conspiracy to use a
6 weapon of mass destruction outside of the United States; all in
7 violation of Title 18, United States Code, Section 2339A(a).

8 Count 2

9 CONSPIRACY TO PROVIDE MATERIAL SUPPORT
10 TO FOREIGN TERRORIST ORGANIZATION

11 Beginning on or about February 26, 2008, and continuing to at
12 least on or about August 5, 2008, within the Southern District of
13 California, and elsewhere, and occurring in and affecting interstate
14 and foreign commerce, defendant AHMED NASIR TAALIL MOHAMUD did
15 unlawfully and knowingly conspire and agree with Basaaly Saeed Moalin,
16 (charged elsewhere), Mohamed Mohamed Mohamud, aka "Mohamed Khadar,"
17 aka "Sheikh Mohamed," (charged elsewhere), and Issa Doreh, aka "Sheikh
18 Issa," (charged elsewhere), and with other persons known and unknown
19 to the grand jury, to provide material support and resources, to wit:
20 currency and monetary instruments, to a foreign terrorist

21 organization, namely, al-Shabaab, which has been designated as a
22 foreign terrorist organization since on or about February 26, 2008,
23 knowing that the organization was designated as a terrorist
24 organization (as defined in Title 18, United States Code,
25 Section 2339B(g)(6)) and that the organization had engaged and was
26 engaging in terrorist activity and terrorism; in violation of
27 Title 18, United States Code, Section 2339B(a)(1).

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Count 3

CONSPIRACY TO KILL IN A FOREIGN COUNTRY

Beginning on a date unknown to the grand jury, and continuing to at least on or about August 5, 2008, within the Southern District of California, and elsewhere, defendant AHMED NASIR TAALIL MOHAMUD did unlawfully and knowingly conspire and agree with Basaaly Saeed Moalin, (charged elsewhere), Mohamed Mohamed Mohamud, aka "Mohamed Khadar," aka "Sheikh Mohamed," (charged elsewhere), and Issa Doreh, aka "Sheikh Issa," (charged elsewhere), and with other persons known and unknown to the grand jury, to commit acts outside the United States that would constitute the offense of murder if committed in the special maritime or territorial jurisdiction of the United States.

OVERT ACTS

In furtherance of said conspiracy and to effect and accomplish the objects thereof, the following overt acts, among others, were committed within the Southern District of California:

1. On or about December 21, 2007, Aden Hashi Ayrow ("Ayrow") advised Basaaly Saeed Moalin ("Moalin") by telephone that he urgently needed several thousand dollars. Moalin replied that he would take care of the issue swiftly with "Sheikh Issa."
2. On or about December 21, 2007, Moalin advised Issa Doreh ("Doreh") by telephone that "one dollar a day per man" was needed for the forces.
3. On or about December 22, 2007, Moalin advised defendant AHMED NASIR TAALIL MOHAMUD by telephone that money was needed for "the young men who are firing the bullets."

- 1 4. On or about January 20, 2008, after telling Moalin that "we
2 planted a land mine" for an individual "who was traveling
3 on that road; he was almost hit," Ayrow instructed Moalin
4 by telephone to tell "Sheikh Mohamed" that "he must let us
5 know the amount of money we can expect every month, even if
6 it is one hundred dollars."
- 7 5. On or about February 13, 2008, Moalin, Doreh and Mohamed
8 Mohamed Mohamud ("Mohamud") caused the transfer of \$2,000
9 from San Diego, California, to Somalia.
- 10 6. On or about February 14, 2008, Moalin told Ayrow by
11 telephone that "Yusuf Mohamed Ali" was the recipient name
12 used to transfer a total of \$2,000 to Ayrow.
- 13 7. On or about April 12, 2008, Ayrow told Moalin by telephone
14 that "it is the time to finance the jihad."
- 15 8. On or about April 12, 2008, Moalin told an individual by
16 telephone that "if those men are to eliminate those men .
17 . . we must send someone to talk to the people . . . we can
18 find thirty men who can pay small amounts."
- 19 9. On or about April 17, 2008, Moalin told Mohamud by
20 telephone that "calls are coming from the man" and that
21 Mohamud should hold back twenty or thirty trusted people at
22 the mosque to tell them to contribute money.
- 23 10. On or about April 23, 2008, Moalin, Doreh and Mohamud
24 caused the transfer of \$3,000 from San Diego, California,
25 to Somalia.
- 26 11. On or about April 24, 2008, Moalin advised Ayrow by
27 telephone that the "three bundles" [code for \$3,000] were
28 sent from San Diego via Amal.

1 12. On or about July 8, 2008, Doreh advised Moalin by telephone
2 that the money had been sent, and that "Dhunkaal Hersi" was
3 the code name used as the recipient's name.

4 13. On or about July 13, 2008, after being advised by uncharged
5 co-conspirator #1 in Somalia that it was difficult to
6 replace ammunition and that each rocket-propelled grenade
7 cost \$270, Moalin told uncharged co-conspirator #1 by
8 telephone that "five cartons" [code for \$5,000] were on
9 their way, but would be broken into several transfers.

10 14. On or about July 15, 2008, Doreh caused the transfer of
11 \$2,280 from San Diego, California, to Somalia.

12 15. On or about July 18, 2008, Moalin and defendant AHMED NASIR
13 TAALIL MOHAMUD discussed over the telephone that they would
14 "lay low" and would proceed with the financial support
15 under the "pretense" of helping the poor.

16 16. On or about July 23, 2008, Moalin caused the transfer of
17 \$1,650 from San Diego, California, to Somalia.

18 All in violation of Title 18, United States Code, Section 956.

19 Count 4

20 CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS

21 Beginning on a date unknown to the grand jury, and continuing to
22 at least on or about August 5, 2008, defendant AHMED NASIR TAALIL
23 MOHAMUD did unlawfully and knowingly conspire and agree with Basaaly
24 Saeed Moalin, (charged elsewhere), Mohamed Mohamed Mohamud,
25 aka "Mohamed Khadar," aka "Sheikh Mohamed," (charged elsewhere), and
26 Issa Doreh, aka "Sheikh Issa," (charged elsewhere), and with others
27 known and unknown to the grand jury, to transmit and transfer monetary
28 instruments and funds from a place in the United States to a place

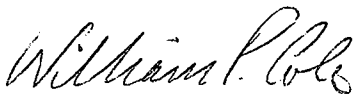
1 outside the United States, to wit: Somalia, with the intent to promote
2 the carrying on of specified unlawful activities, to wit: providing
3 material support to a foreign terrorist organization, in violation of
4 Title 18, United States Code, Section 2339B(a) (1); providing material
5 support to terrorists, in violation of Title 18, United States Code,
6 Section 2339A(a); and conspiracy to kill persons in a foreign country,
7 in violation of Title 18, United States Code, Section 956; all in
8 violation of Title 18, United States Code, Sections 1956(a)(2)(A)
9 and (h).


10 DATED: November 19, 2010.

11 A TRUE BILL:

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13 _____
14 Foreperson

15 LAURA E. DUFFY
16 United States Attorney

17 By: 
18 _____
19 WILLIAM P. COLE
20 Assistant U.S. Attorney

21 By: 
22 _____
23 CAROLINE HAN
24 Assistant U.S. Attorney
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