UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

~~FILED UNDER SEAL~~

UNITED STATES OF AMERICA, Plaintiff, v. 1. AMINA FARAH ALI, a/k/a Amina Aden, a/k/a Amina Adan, a/k/a Amina Wadaado, and 2. HAWO MOHAMED HASSAN, a/k/a Halima Hassan, a/k/a Halimo Hassan, Defendants.	)	**INDICTMENT** CR 10-187 PJS/FLN (18 U.S.C. § 2339B(a)(1)) (18 U.S.C. § 1001(a)(2))

THE UNITED STATES GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times relevant to this indictment:

1. Defendant AMINA FARAH ALI, a/k/a Amina Aden, a/k/a Amina Adan, a/k/a Amina Wadaado, was a Somali national who became a United States citizen in August 2004 and lived in Rochester in the District of Minnesota.

2. Defendant HAWO MOHAMED HASSAN, a/k/a Halima Hassan, a/k/a Halimo Hassan, was a Somali national who became a United States citizen in March 2008 and lived in Rochester in the District of Minnesota.

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3. Al-Shabaab was a terrorist organization based in Somalia, whose primary objective was the violent overthrow of the Somali Transitional Federal Government ("TFG").

4. 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. The designation remains in effect as of this date. Under the designation, al-Shabaab is also known as al-Shabab, Shabaab, the Youth, Mujahidin al-Shabaab Movement, Mujahideen Youth Movement, Mujahidin Youth Movement, MYM, Harakat Shabab al-Mujahidin, Hizbul Shabaab, Hisb'ul Shabaab, al-Shabaab al-Islamiya, Youth Wing, al Shabaab al-Islaam, al-Shabaab al-Jihaad, and the Unity of Islamic Youth. "Al-Shabaab" is an Arabic word that loosely translates to "the Youth" and is commonly used in the Somali language. Al-Shabaab and its members are commonly referred to, and known as "the Youth," "the young guys," and "the young men."

5. Unindicted Conspirator 1 ("UC1") was a member of al-Shabaab who was an al-Shabaab financial representative and then became the al-Shabaab administrative governor for the Bay and Bakool regions in Southern Somalia, after al-Shabaab seized control of those regions in February 2009.

6. Unindicted Conspirator 2 ("UC2") was a subordinate of UC1, who received funds sent to al-Shabaab via Somali telephone

number 25215332225.

7. Unindicted Conspirator 3 ("UC3") was a subordinate of UC1, who received funds sent to al-Shabaab via Somali telephone number 25215401510.

8. Unindicted Conspirator 4 ("UC4") was a subordinate of UC1, who received funds sent to al-Shabaab via Somali telephone numbers 25215104242 and 25215408856.

9. Unindicted Conspirator 5 ("UC5") was a senior member of al-Shabaab's women's department, who conducted lectures and received funds sent to al-Shabaab via Somali telephone number 25215875171.

10. Unindicted Conspirator 6 ("UC6") was a resident of Minneapolis, Minnesota, who assisted ALI in collecting and forwarding funds to al-Shabaab.

11. Unindicted Conspirator 7 ("UC7") was a resident of Columbus, Ohio who assisted ALI in collecting and forwarding funds to al-Shabaab.

12. Jihad is an Arabic word which means, among other things, "holy war." As used in this indictment, it refers to al-Shabaab's and other militias' efforts to topple the TFG through violence.

13. Mujahidin is an Arabic word which means "holy warriors." Mujahid is the singular form of mujahidin.

COUNT 1
(Conspiracy to Provide Material Support
to Foreign Terrorist Organization)

14. The allegations set forth in paragraphs 1 through 13 are realleged and incorporated by reference as though fully set forth herein.

15. From on or about September 17, 2008, through on or about July 19, 2009, in the District of Minnesota, and elsewhere, the defendants,

AMINA FARAH ALI,
a/k/a Amina Aden,
a/k/a Amina Adan,
a/k/a Amina Wadaado, and
HAWO MOHAMED HASSAN,
a/k/a Halima Hassan,
a/k/a Halimo Hassan,

who were United States citizens, did knowingly conspire, confederate and agree with each other and with others, known and unknown to the grand jury, knowingly to provide material support and resources, namely money, to al-Shabaab, which was designated a Foreign Terrorist Organization on February 26, 2008, pursuant to Section 219 of the Immigration and Nationality Act; in violation of Title 18, United States Code, Section 2339B(a)(1).

Manner and Means

The manner and means by which the conspiracy was sought to be accomplished included:

16. It was a part of the conspiracy that ALI communicated by

telephone with persons in Somalia, who requested financial assistance for al-Shabaab.

17. It was further a part of the conspiracy that ALI, HASSAN, and others raised funds by soliciting door-to-door among Somali communities located in Rochester and Minneapolis, and elsewhere in the United States and Canada, some of which funds ALI directed to al-Shabaab.

18. It was further a part of the conspiracy that ALI, HASSAN, and others raised funds for al-Shabaab by direct appeal to participants in teleconferences in which they and other speakers encouraged financial contributions to support violent jihad in Somalia, which contributions ALI directed to al-Shabaab.

19. It was further a part of the conspiracy that ALI and others raised funds for al-Shabaab under the false pretense that the funds were for the poor and needy.

20. It was further a part of the conspiracy that ALI and others acting at her direction transmitted funds to al-Shabaab through the hawala money remittance system, using Dar al Tawakul General Trading, LLC, a/k/a Tawakal Money Express; Kaah Express, LLC; Dahabshiil; Dahabshil, Inc.; Qaran Express US, Inc.; Amaana Money Transfer; and Mustaqbal Express, among others.

21. It was further a part of the conspiracy that ALI and others used false and fictitious names to identify the recipient of

the funds in order to conceal that the funds were being provided to al-Shabaab.

Overt Acts

22. On or about September 22, 2008, ALI called UC1 in Somalia to verify he had received approximately $1060 sent to him under the name Nimco Ali Mohamed.

23. On or about October 23, 2008, ALI spoke with UC5, who was in Somalia, asking about the availability of a speaker to address ALI's audience in an upcoming teleconference.

24. On or about October 26, 2008, ALI hosted a fund raising teleconference in which UC5 told the listeners that it was not the time to help the poor and needy in Somalia; rather, the priority was to give to the mujahidin.

25. On or about October 26, 2008, ALI and HASSAN recorded approximately $2,100 in pledges at the conclusion of the teleconference.

26. On or about November 7, 2008, ALI told UC6, to contact people from the Minneapolis/St. Paul area, who had pledged contributions, and to collect those funds.

27. On or about December 6, 2008, ALI told another that she had sent funds to al-Shabaab stating that she sent the money to the "brothers, . . . to their account, towards [UC1]."

28. On or about January 12, 2009, ALI directed UC7 to "always

collect under the name of the poor" so that those funds could be sent to the mujahidin in Somalia.

29. On or about February 10, 2009, ALI conducted another fund raising teleconference in which she delivered a lecture telling her listeners to "forget about the other charities" and focus on "the Jihad."

30. On or about February 10, 2009, at the conclusion of the teleconference, HASSAN told the audience that, if they pledged, their names and contact information would be recorded but that ALI would be the one to contact them to collect the funds.

31. On or about February 16, 2009, UC1 told ALI that any funds, regardless of their purpose, should be directed to his assistant, UC4, at an account number UC4 would provide.

32. On or about February 17, 2009, ALI asked UC1 if she could make up names to use as the recipients of funds she was sending to al-Shabaab like she had done in the past.

33. On or about February 23, 2009, ALI directed another person to send $1000 to al-Shabaab account number 25215401510 using the false name Shamso Ali Ahmed as the recipient of the funds.

34. On or about April 3, 2009, ALI told HASSAN that the purpose for the fund raising was to support al-Shabaab, by stating, "We are with the Youth."

35. On or about April 17, 2009, ALI directed another to send

$1600 to Somalia using two different hawalas and sending half to the name Shamso Ali Ahmed and the other half to Maryann Muse Bakar, at the same telephone number 25215401510.

36. On or about May 20, 2009, ALI contacted UC4 and told her two transfers totaling $1200 had been sent to a new al-Shabaab account number ending in 4242, which account number ALI had received from UC1.

37. On or about July 14, 2009, following the FBI's execution of a search warrant at ALI's residence, ALI contacted UC1 and stated that "I was questioned by the enemy here. . . . they took all my stuff and are investigating it. . . do not accept calls from anyone."

38. Each of Counts 2 through 13 below is incorporated as an overt act as if fully set forth herein.

COUNTS 2-13
(Material Support to Foreign Terrorist Organization)

39. The allegations set forth in paragraphs 1 through 13 are realleged and incorporated by reference as though fully set forth herein.

40. On or about the dates alleged below, in the District of Minnesota, the defendant,

AMINA FARAH ALI,
a/k/a Amina Aden,
a/k/a Amina Adan,
a/k/a Amina Wadaado,

who was a United States citizen, did knowingly provide and attempt to provide material support and resources, namely, money in the approximate amounts alleged below, to al-Shabaab, which was designated a Foreign Terrorist Organization on February 26, 2008, pursuant to Section 219 of the Immigration and Nationality Act:

Count	Date	Amount
2	September 17, 2008	$1063
3	October 30, 2008	$1000
4	November 2, 2008	$ 500
5	February 12, 2009	$ 750
6	February 23, 2009	$1000
7	February 23, 2009	$1000
8	March 10, 2009	$ 550
9	March 14, 2009	$1195
10	May 18, 2009	$ 500
11	May 18, 2009	$ 500
12	May 31, 2009	$ 250
13	July 5, 2009	$ 300

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

COUNT 14
(False Statement)

41. The allegations set forth in paragraphs 1 through 13 are realleged and incorporated by reference as though fully set forth herein.

42. On or about September 2, 2009, in the State and District

of Minnesota, in a matter within the jurisdiction of the Federal Bureau of Investigation, namely an international terrorism investigation, the defendant,

HAWO MOHAMED HASSAN,
a/k/a Halima Hassan,
a/k/a Halimo Hassan,

knowingly and willfully made a false material statement and representation to the FBI in that she stated she did not know anyone who had sent money to al-Shabaab, the mujahidin, the "Young Men," or the fighters; all in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 15
(False Statement)

43. The allegations set forth in paragraphs 1 through 13 are realleged and incorporated by reference as though fully set forth herein.

44. On or about September 2, 2009, in the State and District of Minnesota, in a matter within the jurisdiction of the Federal Bureau of Investigation, namely an international terrorism investigation, the defendant,

HAWO MOHAMED HASSAN,
a/k/a Halima Hassan,
a/k/a Halimo Hassan,

knowingly and willfully made a false material statement and representation to the FBI in that she stated that Amina Ali had

never asked her to send money to Somalia or elsewhere through a hawala; all in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 16
(False Statement)

45. The allegations set forth in paragraphs 1 through 13 are realleged and incorporated by reference as though fully set forth herein.

46. On or about September 14, 2009, in the State and District of Minnesota, in a matter within the jurisdiction of the Federal Bureau of Investigation, namely an international terrorism investigation, the defendant,

HAWO MOHAMED HASSAN,
a/k/a Halima Hassan,
a/k/a Halimo Hassan,

knowingly and willfully made a false material statement and representation to the FBI in that she stated that she and Amina Ali never discussed raising money for the "young men;" all in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON