

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA)
)
 v.) Case No. 25-mj-104 (DLM)
)
 ABDISATAR AHMED HASSAN)

CRIMINAL COMPLAINT

I, Scott L. Zimmerman, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1: On or about December 13, 2024, and December 29, 2024, in Hennepin County, in the State and District of Minnesota, and elsewhere, the defendant, ABDISATAR AHMED HASSAN, attempted to knowingly provide material support and resources to a designated foreign terrorist organization, all in violation of Title 18, United States Code, Sections 2339B.

I further state that I am a sworn and licensed federal Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT OF SA SCOTT L. ZIMMERMAN IN SUPPORT OF CRIMINAL COMPLAINT

Continued on the attached sheet and made a part hereof: Yes No


Complainant's signature

Scott L. Zimmerman, Special Agent, FBI
Printed name and title

SUBSCRIBED and SWORN before me, by reliable electronic means via Zoom and email, pursuant to Fed. R. Crim. P. 41(d)(3),

Date: 2/27/25


Judge's signature

City and state: Saint Paul, Minnesota

Douglas L. Micko, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT

for the

District of Minnesota

United States of America)

v.)

ABDISATAR AHMED HASSAN)

Case No. 25-mj-104 (DLM)

ARREST WARRANT

To: Any authorized law enforcement officer

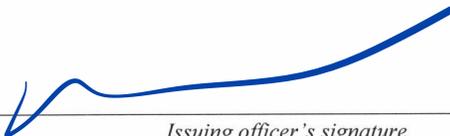
YOU ARE COMMANDED to arrest and bring before a United States Magistrate Judge without unnecessary delay
(name of person to be arrested) ABDISATAR AHMED HASSAN,

who is accused of an offense or violation based on the following document filed with the Court:

Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

charging him with (Count 1) Attempting to Knowingly Provide Material Support and Resources to a Designated Foreign Terrorist Organization, in violation of Title 18, United States Code, Sections 2339B.

Date: 2/27/25



Issuing officer's signature

City and State: Saint Paul, Minnesota

Douglas L. Micko, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
25-mj-104 (DLM)

UNITED STATES OF AMERICA

v.

ABDISATAR AHMED HASSAN

Investigative – Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Scott L. Zimmerman, being first duly sworn, hereby state as follows:

Introduction and Agent Background

1. I make this Affidavit in support of a Criminal Complaint charging the defendant, ABDISATAR AHMED HASSAN (YOB 2002), with violation of 18 U.S.C. § 2339B (attempting to provide material support and resources to a designated foreign terrorist organization) (“the Subject Offense”).

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since September 2002. I am currently assigned to the Minneapolis Joint Terrorism Task Force (“JTTF”) and have been assigned to this position since June 2005. Amongst my duties as an FBI Special Agent, I investigate, among other things, criminal violations relating to terrorism, such as material support to designated foreign terrorist organizations. During my career, I have been involved in the investigations of several individuals who traveled or attempted to travel overseas to join foreign terrorist organizations, including the investigations of over 20 men who traveled from Minnesota to Somalia to join al-Shabaab. The statements contained in this Affidavit are based in part on information I have learned through

my own investigation, my background, training, and experience as a special agent assigned to the JTTF, the investigation of other FBI special agents and law enforcement officers, records and other evidence obtained during the course of this investigation, and discussions with individuals as set forth herein this Affidavit. This Affidavit, however, is intended to show merely that there is sufficient probable cause for the charge alleged in the complaint and does not set forth all of my or the government's knowledge about this matter and investigation.

3. This Affidavit contains translations of certain Arabic and Somali words and phrases. These translations are based on information provided to me by an FBI linguist and from my training and experience. The translations, however, are in preliminary form and have not yet been finalized.

4. Based on my training, experience, and knowledge of the investigation, and the facts as set forth in this Affidavit, there is probable cause to believe that HASSAN has committed the Subject Offense, that is, HASSAN has attempted to provide material support and resources, as that term is defined in 18 U.S.C. § 2339A(b)(1), including personnel (i.e., himself), to a designated foreign terrorist organization, namely, the Islamic State of Iraq and Syria ("ISIS").

Statutory Authority

5. Title 18, United States Code, Section 2339B prohibits, in pertinent part, a person from knowingly providing "material support or resources to a foreign terrorist organization," or attempting or conspiring to do the same.

6. “The term ‘material support or resources’ means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” 18 U.S.C. § 2339A(b)(1). “The term ‘training’ means instructions or teaching designed to impart a specific skill, as opposed to general knowledge.” 18 U.S.C. § 2339A(b)(2). “The term ‘expert advice or assistance’ means advice or assistance derived from scientific, technical or other specialized knowledge.” 18 U.S.C. § 2339A(b)(3).

7. Title 18, United States Code, Section 2339B(h) states “no person may be prosecuted under this section in connection with the term ‘personnel’ unless that person has knowingly provided, attempted to provide, or conspired to provide a foreign terrorist organization with 1 or more individuals (who may be or include himself) to work under that terrorist organization’s direction or control or to organize, manage, supervise, or otherwise direct the operation of that organization. Individuals who act entirely independently of the foreign terrorist organization to advance its goals or objectives shall not be considered to be working under the foreign terrorist organization’s direction and control.”

Background

The Islamic State of Iraq and Syria (“ISIS”) is a Designated Foreign Terrorist Organization

8. On or about October 15, 2004, the U.S. Secretary of State (“Secretary”) designated al Qaeda 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 (the “INA”) and as a Specially Designated Global Terrorist (“SDGT”) under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as an SDGT entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (i.e., “ISIS”), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-’Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS.¹ On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

9. ISIS has increasingly sought to generate revenue in East Africa. ISIS’s affiliate in Somalia (“ISIS-Somalia”), which continues to conduct terrorist attacks

¹ For simplicity, the Affidavit will reference the FTO as “ISIS.”

against civilians, generates much of its funding by extorting local communities for funding and recruits. The group punishes, intimidates, and assassinates Somali businessmen and civilians who do not support it financially or provide supplies. ISIS-Somalia aims to extend ISIS's self-proclaimed caliphate in Africa. ISIS-Somalia primarily operates in the mountains of the Bari region of Puntland, a semiautonomous Federal Member State of Somalia.

Facts Supporting Probable Cause

Summary of Investigation

10. The FBI has been conducting an ongoing national security investigation of HASSAN for violations of 18 U.S.C. § 2339B (attempting to provide material support to a designated foreign terrorist organization) and related offenses since June 2024. HASSAN is a twenty-two-year-old ethnic-Somali male resident of Minneapolis, Minnesota. Public records checks and other investigation revealed HASSAN to have resided in Amarillo, Texas prior to relocating to Minneapolis during 2023.

11. A review of records provided by U.S. Citizenship and Immigration Services ("USCIS") indicate HASSAN was born in Garissa, Kenya, in 2002. HASSAN's parents were both listed as having been born in Badade (variant Badhadhe), Somalia, which is located in the Lower Juba Region in southern Somalia.

12. In a report dated May 28, 2024, the New York Police Department Intelligence & Counterterrorism Bureau notified the FBI that HASSAN was assessed

to be the user of TikTok and Instagram accounts that had posted content supportive of al-Shabaab.²

13. In mid-June 2024, the FBI conducted open source queries of Facebook and identified HASSAN's Facebook account as Display Name *Abdisatar Ahmed*. The "About" section of the account indicated the owner is from Garissa (Kenya), lives in Minneapolis, Minnesota, studied Architecture at Minneapolis College, and went to Palo Duro High School. A query of open-source information revealed Palo Duro High School to be located in Amarillo, Texas.

14. Open-source review of HASSAN's *Abdisatar Ahmed* Facebook account revealed multiple videos containing clips from speeches by deceased al-Qaeda cleric Anwar al-Awlaki.³ In addition, multiple videos posted by the account appeared supportive of al-Shabaab. For instance, on or about May 6, 2024, the *Abdisatar Ahmed* account posted a video with the emblem from the black flag used by both al-Shabaab and ISIS. The video included audio of a nasheed⁴ along with accompanying text regarding having "*raised the black flag.*" The account appeared to have added a

² On February 26, 2008, the United States Secretary of State designated al-Shabaab as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. The Secretary of State has also listed the following aliases for al-Shabaab: 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. To date, al-Shabaab remains a designated FTO.

³ Anwar al-Awlaki was a Yemeni-American cleric who served as the leading English language propagandist for al-Qaeda. Awlaki was killed in a drone strike conducted by U.S. Forces in 2011.

⁴ In my training and experience, a "nasheed" is a work of vocal music that is most often sung a cappella, and which carries with it an Islamic belief or practice.

caption to the video stating “*The flag of Islam.*” Similarly, on or about June 12, 2024, HASSAN’s *Abdisatar Ahmed* account posted a video that appeared to be an al-Shabaab propaganda video, featuring presumed al-Shabaab soldiers carrying the black and white jihadist flags used by al-Shabaab.

15. On or about July 8, 2024, a query of open-source information for the *Abdisatar Ahmed* Facebook account revealed that the account was no longer available. Based on training and experience, Your Affiant believes the account was likely suspended by Facebook for posting extremist content.

HASSAN’s Qays Man Facebook Account

16. On or about September 25, 2024, open-source queries of Facebook identified HASSAN’s current account as display name: *Qays Man* (“the *Qays Man* account”). The profile photo for the *Qays Man* account featured an individual believed to be HASSAN looking downward at his phone, and it matched a photo that had been included in the profile of HASSAN’s *Abdisatar Ahmed* Facebook account.

17. On or about January 10, 2025, Comcast Cable Communications provided subscriber information for approximately 17 IP addresses associated with the *Qays Man* Facebook account. Your Affiant learned that the listed subscriber for all 17 IP addresses, which had been used to access the *Qays Man* account between August 14, 2024 and December 30, 2024, was HASSAN’s father, listing the same address as that of HASSAN.

18. Since September 25, 2024, Your Affiant regularly viewed the *Qays Man* account's public posts, which showed numerous videos containing al-Shabaab propaganda, as well as other videos supportive of ISIS, as noted below.

19. On or about September 29, 2024, the *Qays Man* account posted a video with the caption, "*There's nobody like them; #islamic #mujahid.*" This same video had also originally been posted by a separate TikTok user. The video included footage of apparent ISIS militants praising the mujahideen⁵ including, for example: "*they are the lions of jihad;*" "*anybody who attacks them are from the kuffar and from the munafiqeen;*"⁶ and "*we are the ones who should follow them.*" Toward the end of the video, a banner at the top reads, "*CELEBRATION ON THE STREETS OF AR-RAQQAH,*" and appears to depict ISIS militants in Raqqa, Syria.⁷

20. On or about October 14, 2024, the *Qays Man* account posted another video with the caption, "*1 Ummah.*"⁸ The video included an image of two anime characters, one with the letters "AQ" and one with the letters "IS," along with audio from a nasheed. Your Affiant believes the two anime characters were meant to represent al-Qaeda (AQ) and the Islamic State/ISIS (IS).

⁵ In my training and experience, "mujahideen" refers to Muslims who fight on behalf of Islam.

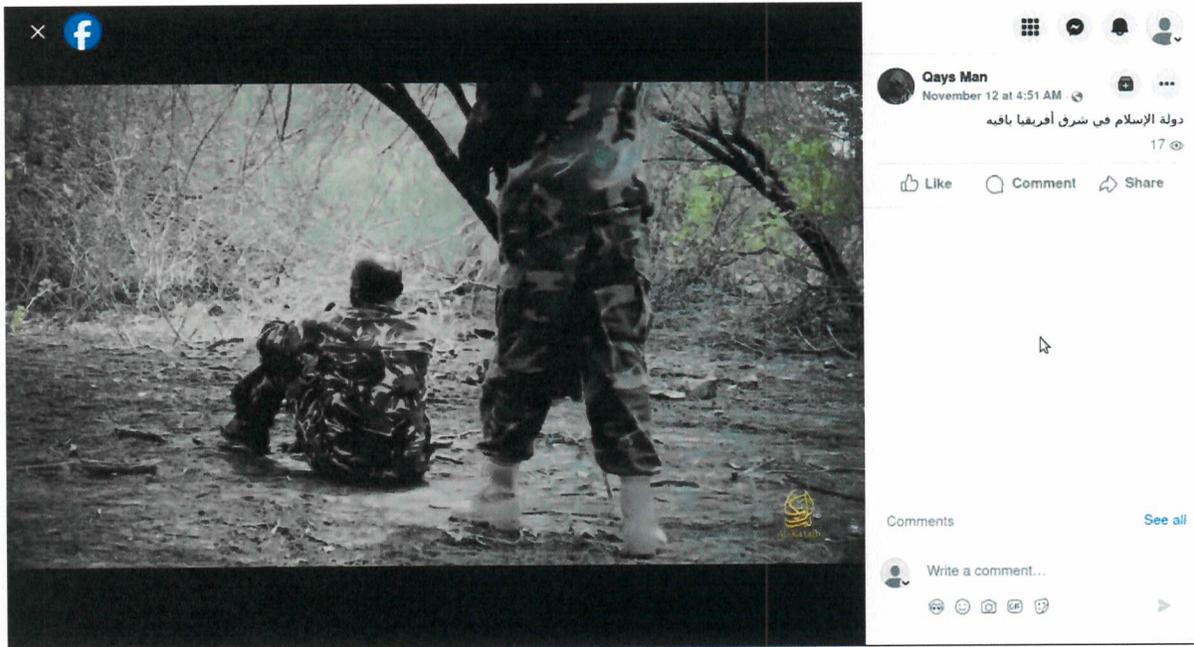
⁶ In my training and experience, I know that "kuffar" is a derogatory term used to refer to non-Muslims, and that "munafiqeen" is a term used to refer to so-called false Muslims, that is, Muslims who are not true believers.

⁷ Your Affiant knows, based on training and experience, that Raqqa is a former capital of the so-called Islamic State in Syria.

⁸ In my training and experience, I know that "Ummah" refers to the Muslim or Islamic community.

21. As of October 16, 2024, the profile for the *Qays Man* account had been changed to an image of the letters “AQ,” which Your Affiant believes to be a reference to al-Qaeda.

22. On or about November 12, 2024, the *Qays Man* account posted another video originally produced by al-Shabaab’s Al-Kataib Media Foundation, with the Al-Kataib logo included in the lower right corner of the video. Your Affiant knows, based on training and experience, that Al-Kataib Media Foundation is the media wing of al-Shabaab. Text included at the end of the video indicated it had been produced by Al-Kataib in 2017. Your Affiant knows, based on training and experience, that Al-Kataib Media Foundation is the media wing of al-Shabaab. The video featured a handcuffed Kenyan soldier speaking to the camera. The Kenyan soldier is then shown being shot and killed from behind by an al-Shabaab militant. The *Qays Man* account added a caption to the post in Arabic, which translated as, “*The Islamic State in East Africa is remaining.*” Below is a screenshot from this video:



23. On or about December 6, 2024, the *Qays Man* account posted a video which included an image of a map of northern Puntland, Somalia, along with a black and white emblem with the writing “*Somalia Wilayah*,” which translates to “*Somalia Province*.” Your Affiant knows, based on training and experience, this emblem is used by ISIS-Somalia, aka the Islamic State in Somalia, the Somalia-based affiliate of ISIS. The video also contained audio from a nasheed. The FBI assesses the map is meant to depict ISIS-Somalia territory within Puntland, which is a semiautonomous Federal Member State of Somalia. Your Affiant is aware ISIS-Somalia is based in the Golis mountains within Puntland’s Bari region, which is included on the map posted by HASSAN.



HASSAN's Contacts with the Manjaniq Media Center

24. On or about December 9, 2024, Your Affiant reviewed the October 2024 PRTT on the *Qays Man* account and learned that the account had exchanged approximately 81 bi-directional Direct Messages with Facebook account *Manjaniq Media Center*, (“the *Manjaniq Media Center* account”) between December 2, 2024 and December 5, 2024.

25. On December 9, 2024, an open-source review of the *Manjaniq Media Center* account revealed that the account profile described itself as a “media agency.” The account’s public posts were all in the Somali language. On or about November

24, 2024, the *Manjaniq Media Center* account posted the following, as translated by a Somali linguist: “*Manjaniq Media Center is a media organization that nurtures the righteous youth of the Islamic Caliphate.*”

26. On or about November 26, 2024, the *Manjaniq Media Center* account posted an image of an individual carrying a backpack along with bolded Somali text, which according to a Somali linguist referenced “*the calling of Allah.*” (“The Nov. 26 Post”). The Nov. 26 Post included several questions in Somali, which according to the Somali linguist translated to: “*Why postpone the calling of Allah and hinder making Hijrah?*”⁹ “*What is blocking you from living in an area that is blessed, respectful, and fighting the enemy?*” “*Are you content with living in the land of the infidel with the polytheism flag flying while being disgraced?*” “*Are you happy living with your children and wives while the prisons are filled with true believers and those healthy girls are violated?*” “*What are you missing and waiting for that you want to bring in front of Allah tomorrow?*”

27. Based on my training and experience, Your Affiant believes “*the Islamic Caliphate*” is a reference to ISIS, and Your Affiant further believes the Nov. 26 Post by the *Manjaniq Media Center* account is meant to encourage Somali-speaking individuals to travel and fight on behalf of ISIS.

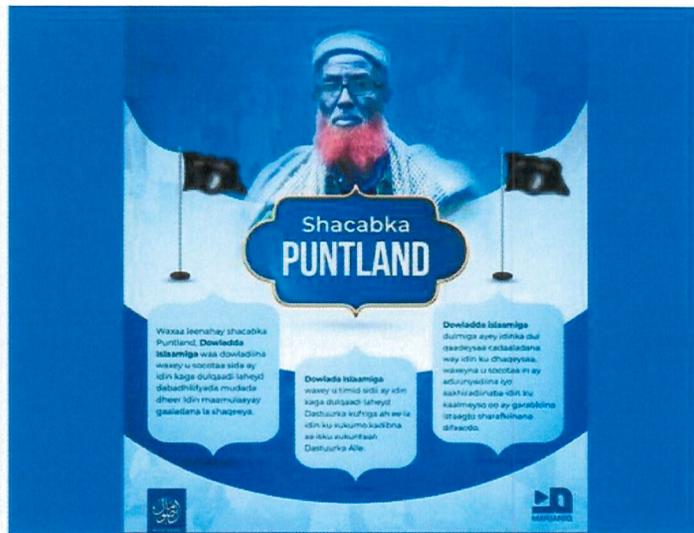
⁹ I know, based on my training and experience, that “Hijra” or “Hijrah,” is an Arabic word meaning “migration,” but is commonly used by ISIS to refer to migration to ISIS-controlled territory for the purpose of joining or supporting ISIS to engage in violent jihad. “Jihad” is an Arabic word that literally means striving or struggling, but in the context of ISIS supporters, commonly refers to a holy war, fight, or struggle against the enemies of Islam.

28. On or about December 30, 2024, further review of the results of the previously referenced October 2024 PRTT order revealed HASSAN's *Qays Man* account had exchanged an additional 50 bi-directional Direct Messages with the *Manjaniq Media Center* account from December 16 to December 27, 2024. Approximately 36 of the Direct Messages were exchanged on December 27, 2024, two days before HASSAN's second attempted departure to Somalia from the United States, as further described below.

29. On January 4, 2025, Your Affiant conducted an additional open-source review of the *Manjaniq Media Center* account. Your Affiant learned that on or about December 31, 2024, the account had posted an image of Puntland President Said Deni, along with images of a burning military vehicle and deceased and/or injured soldiers. At the bottom of the image was the emblem for ISIS-Somalia along with English text stating, "*ISLAMIC STATE.*" The Somali text included in the post, as translated by a Somali linguist, stated "*The battle is just beginning. You still have a chance to repent to Allah and you will be saved from us.*"



30. Your Affiant’s review of the *Manjaniq Media Center* account further revealed that on or about January 3, 2025, the account had posted an image of Abdulqadir Mumin, along with the emblem of ISIS-Somalia and two ISIS flags. Your Affiant knows, based on training and experience, that Abdulqadir Mumin is the founder and leader of ISIS-Somalia. Along with the image of Mumin, the *Manjaniq Media Center* account included Somali text which, as translated by a Somali linguist, was addressed to the people of Puntland, stating, “*the Islamic government is your government and it is going to get rid of the oppressors who have been controlling you for a long time and work with the infidels.*” Your Affiant believes the post was referring to ISIS-Somalia taking over control of Puntland from the Puntland Government.



31. On or about January 27, 2025, in response to a court-authorized search warrant, the FBI obtained data and information for HASSAN’s *Qays Man* Facebook account, as well as for the *Manjaniq Media Center* Facebook account. Included was the Nov. 26 Post, discussed above, by the *Manjaniq Media Center* account, and a comment in Somali to the Nov. 26 Post by HASSAN’s *Qays Man* account on December 2, 2024, which a Somali linguist translated as, “*Friend, who should I contact with that is in ISIS controlled area?*” The information provided by Meta, however, did not include a response to the question posed by the *Qays Man* account.

HASSAN’s First Attempted Travel to Somalia

32. On December 10, 2024, the FBI learned that HASSAN was scheduled to depart the United States on December 13, 2024, on one-way travel to the final destination of Garoowe, Somalia, which is located in the Federal Member State of Puntland (as described above). HASSAN’s itinerary indicated he was scheduled to fly from Minneapolis-St. Paul International Airport (“MSP”) to Chicago O’Hare International Airport via United Airlines; then depart Chicago O’Hare for Addis

Ababa, Ethiopia; and then fly onward from Addis Ababa to Garoowe. HASSAN's itinerary did not include any return flights to the United States.

33. The FBI investigation has not identified any Puntland-based relatives or other associates of HASSAN whom he could have intended to visit for familial or social purposes. As previously noted, USCIS records indicate HASSAN's parents were both born in the Lower Juba Region in southern Somalia. Your Affiant is aware Garoowe would not be a logical arrival point for onward travel to the Lower Juba Region. Garoowe, however, is known by Your Affiant to be a logical arrival point for onward travel to the Bari region of Puntland, where ISIS-Somalia is known to be present.

34. During the early morning of December 13, 2024, FBI Agents were present at the MSP Airport and observed HASSAN near an airline ticketing area with one carry-on roller bag and no other luggage. HASSAN was observed speaking with a United Airlines employee at the ticketing area, and then was later observed making a telephone call. During the telephone call, which HASSAN made in a public space in the airport, FBI Agents overheard HASSAN tell someone that he did not have a visa for Somalia. HASSAN eventually exited the terminal, was picked up by a vehicle, and departed MSP Airport.

35. After HASSAN's departure from MSP Airport, FBI Agents spoke with the United Airlines employee who had been speaking with HASSAN at the ticketing area. The employee stated HASSAN had attempted to check in for his flight to Somalia. The employee had advised HASSAN that he could not travel to Somalia

unless he provided a scan of a passport from someone in Somalia. When HASSAN told the employee that he did not know anyone in Somalia, the employee informed HASSAN that he could not check in for his flight. HASSAN asked if United could rebook him for a flight next week and was told he would need to rebook his travel through his travel agency. HASSAN then left the check-in area.

36. In response to legal process, Wells Fargo bank provided statements from HASSAN's checking account that showed a charge from Ethiopian Airlines authorized on November 30, 2024, in the amount of \$2,081.72, which posted to the account on December 2, 2024. Your Affiant believes and assesses that this payment was for HASSAN's booked one-way travel to Somalia, as described above. The Wells Fargo records also showed a \$64.00 charge authorized on December 13, 2024, with a notation "Ets – Mogadishu So Mogadishu Som." Your Affiant believes that this payment relates to HASSAN having purchased a Somali visa, either online or through the travel agency, after being turned away on December 13, 2024, because he was not permitted by the airline employee to travel without proof of a Somali visa.

HASSAN's Second Attempted Travel to Somalia and CBP Interview

37. On or about December 20, 2024, the FBI learned that HASSAN had rebooked his one-way travel to Garoowe, Somalia, with a scheduled departure on December 29, 2024. HASSAN's itinerary again indicated he was scheduled to fly from MSP to Chicago O'Hare International Airport via United Airlines; then depart Chicago O'Hare for Addis Ababa, Ethiopia; and then fly onward from Addis Ababa to

Garowe. HASSAN's itinerary again did not include any return flights to the United States.

38. During the early morning of December 29, 2024, FBI Agents were present at MSP Airport and observed HASSAN check in and board his flight from MSP to Chicago O'Hare. HASSAN was observed on his phone in a public area near the boarding gate while waiting for his flight. A Customs and Border Protection ("CBP") Officer fluent in the Somali language overheard HASSAN talking on the phone and believed HASSAN was talking to someone in Garowe and asking the person about SIM cards. HASSAN referred to the person he was talking to as "Abti," which Your Affiant knows means "uncle" in Somali. HASSAN was observed by the CBP Officer receiving an additional WhatsApp message during the conversation, possibly from someone listed on HASSAN's phone as "*Ali Sh. Abdulkadir.*" An FBI Agent overheard HASSAN tell a Transportation and Security Administration ("TSA") Agent in a public space at the airport that he was going to Somalia to visit friends, and that he was born in Kenya, but his uncle lives in Somalia.

39. After arriving at Chicago O'Hare, HASSAN was interviewed by CBP Officers with CBP's Tactical Terrorism Response Team before HASSAN's outbound international flight on Ethiopian Airlines to Addis Ababa, Ethiopia.¹⁰ The CBP Officer issued a report on the interview and related inspection, which Your Affiant

¹⁰ CBP conducted the interview and inspection of HASSAN based in part on information provided by the FBI regarding HASSAN's attempted outbound travel on December 13, 2024, his posting of FTO propaganda online, and the belief that HASSAN might travel in support of joining an FTO. Prior to the interview and inspection, the FBI provided CBP with open source social media posts made by HASSAN in support of FTOs.

obtained from CBP and reviewed, along with the audio-video recording of the interview.

40. During the CBP interview, HASSAN stated his intention was to travel to Somalia to visit his uncle, Ali Sheick Abdulkadir. Later during the interview, however, HASSAN admitted that Abdulkadir was not HASSAN's uncle, and they had never met. HASSAN did not know what Abdulkadir did for work or where he resided and had only been introduced to Abdulkadir recently through the travel agency HASSAN had used to book his tickets. HASSAN claimed Abdulkadir would pick him up from the Garoowe airport and drive him to Galkayo. HASSAN claimed he did not have specific plans, stating Abdulkadir will show and introduce him to traditional life and Somali culture. The CBP inspection report noted that while answering questions about his trip, HASSAN stated that he was not there to do anything bad, even when not asked if he was.

41. Because HASSAN's itinerary was booked as one-way with no scheduled return flight, CBP Officers questioned HASSAN about the length of his trip. HASSAN claimed he was due to return in the middle of January (2025). HASSAN claimed his return was routed from Mogadishu, Somalia to Doha, Qatar, and then to the United States. HASSAN admitted, however, he was unsure how he would get from Galkayo to Mogadishu, claiming that he might buy a domestic Somali airplane ticket or Abdulkadir might drive him.¹¹

¹¹ Your Affiant conducted a simple Google query and learned that the distance between Mogadishu and Galkayo is approximately 357 miles and would take over 13 hours to travel by vehicle.

42. CBP Officers also questioned HASSAN concerning his previous denial of boarding on December 13, 2024. HASSAN stated he had since contacted the travel agency, who had put him in direct contact with Abdulkadir for rebooking and obtaining a Somali visa.

43. When questioned as to why he was so adamant about going to Somalia, HASSAN again stated that he wanted to learn his culture. HASSAN denied he was going to meet anyone other than Abdulkadir, denied having any other contacts in Somalia, and denied traveling for any other purpose. When asked if his parents knew about his planned trip to Somalia, HASSAN stated that his father knew about it. HASSAN also denied using any social media.

44. In accordance with the CBP outbound inspection, a baggage exam was conducted on HASSAN's luggage, which consisted of only one carry-on bag. The exam revealed the carry-on bag contained HASSAN's high school diploma, birth certificate, and naturalization certificate. When advised by CBP Officers that these documents were indicative of a longer voyage than one month, HASSAN claimed that he had overlooked that he had the documents in his carry-on bag.

45. HASSAN was also found in possession of a Somali Passport issued to S.G.F. (YOB 1994), a United States citizen. HASSAN told CBP Officers that he was going to give the passport to Abdulkadir, but HASSAN denied having any relationship with S.G.F. CBP travel checks indicated that S.G.F.'s last border crossing into the United States occurred in April 2024 in Detroit.

46. The CBP inspection revealed HASSAN to be carrying approximately \$400 USD, which HASSAN stated he planned on using to support himself while in Somalia. HASSAN also claimed he was due to get paid \$1,200 USD from Uber and was hoping to obtain that money while in Somalia.

47. During the CBP inspection, a preliminary inspection of HASSAN's electronic devices was conducted, consisting of a manual review by the CBP Officer of HASSAN's two cellular telephones. According to the CBP Report, the preliminary inspection revealed he had extensive ISIS propaganda, including ISIS training and recruitment material. The preliminary inspection also revealed that HASSAN had received a text message on November 30, 2023, from an individual with an online school. Open-source review of the school's website revealed it to be an online school that helps students learn the skills and techniques they will need to be successful in the firearms and uncrewed technology industries (i.e., drone technology). The text message indicated HASSAN had previously inquired or otherwise expressed interest in the online school, and referenced answering any questions HASSAN may have about the online school's gunsmithing and/or unmanned aerial drone programs.

48. Contrary to HASSAN's denial, the preliminary inspection revealed that HASSAN did use social media. The preliminary inspection showed HASSAN had a Telegram account that was subscribed to a Telegram channel entitled "*Abu Obaida's Nasheed Archive*." According to the CBP report, the Telegram page had attached downloads labeled, "*The life of a Mujahideen*," "*The month of Jihad*," and "*The return of the Caliphate*." Review of photographs taken by the CBP Officer of HASSAN's

phone during the preliminary inspection also revealed the Telegram channel contained downloaded audio files, including “*The path of jihad.*” Some of the downloads originated from the al-Hayat Media Center which, as noted above, Your Affiant knows based on training and experience is a media wing of ISIS. HASSAN’s Telegram account had an associated display name of *Qays Man*, and HASSAN told CBP Officers during the CBP interview that his Facebook account username is “Qays Man.”

49. The preliminary inspection also noted a text message sent by HASSAN, on or before April 1, 2024, in which HASSAN wrote “*All I need is jihad.*” The CBP preliminary inspection also found that HASSAN had shared pro-ISIS views and had the ISIS flag included in the profile of his TikTok account. The preliminary inspection also revealed Facebook Direct Messages exchanged between HASSAN and the *Manjaniq Media Center* account.¹²

50. CBP Officers used the Google Lens App on a government-issued cellular phone to translate some of the messages exchanged between HASSAN and the *Manjaniq Media Center* account from Somali to English. Per the translations, on an undetermined date, HASSAN addressed the *Manjaniq Media Center* account as “*commander*” and “*uncle.*” Also on an undetermined date, HASSAN referred to being “*released on Dec 29*” and stated “*the plane took off on the 29th.*”

¹² The messages with the *Manjaniq Media Center* account were not discussed in the CBP report, but rather were included in photographs taken by the CBP Officers of HASSAN’s phone during the inspection. HASSAN’s Facebook account ID and display name were not visible in the photographs of the messages, but HASSAN provided his Facebook account to CBP Officers as “Qays Man,” and is therefore believed to have been using the *Qays Man* account during the messages exchanged.

51. In a message exchange on or about December 5, 2024, the *Manjaniq Media Center* account told HASSAN “*The barracks are fine,*” to which HASSAN ultimately responded, “*I will wait in a safe place until you talk to me.*” In a subsequent message on the same day, HASSAN stated (as translated) “*Bosses and garowe are all children, the battlefield is now between khalbeir and armo.*” Your Affiant believes HASSAN to be referencing the Somali cities of Boosaaso and Garoowe, and the districts/villages of Kalabayr and Armo. Your Affiant knows that Kalabayr and Armo are located in the Bari region of Puntland in Somalia. Open-source reporting from on or about December 9, 2024 indicated a substantial troop deployment of Puntland Defense Forces had been stationed in Kalabayr, Bari region. The troops had reportedly been deployed in preparation for an offensive aimed at eliminating ISIS-affiliated elements in the Bari and Sanaag regions of Puntland. Your Affiant believes HASSAN’s reference to “the battlefield” refers to this offensive and the corresponding attacks on Puntland Defense Forces conducted by ISIS-Somalia.

52. The preliminary inspection of HASSAN’s cell phones also revealed that on December 18, 2024, HASSAN had created a Telegram channel with the logo from the ISIS flag as the channel photo. In the channel, HASSAN had sent links containing PDFs titled, “*Illustrated Manual of Sniper Skills*” and “*Sniper_Trading_Workbook_Step_by.*” HASSAN had also posted an image of the ISIS flag to the channel.

53. When asked about the information supportive of ISIS found on his phone, HASSAN initially claimed that those were his previous views and that he does not share them now. After being advised by CBP Officers that the ISIS flag group he created was only started on December 18, 2024, and that his ISIS chat is still active and therefore could not be “past views,” HASSAN admitted that he is an ISIS supporter and consumes and disseminates ISIS propaganda. HASSAN then professed his belief that Muslims should be joined as one country in a caliphate, stating it was every Muslim’s dream. HASSAN further claimed that hypothetically, if offered to join a jihadi group, he would do his duty as a Muslim but would not hurt people. HASSAN stated he supports the struggle of his Muslim brothers, but he is not a terrorist.

54. HASSAN admitted he started consuming ISIS propaganda after the Israel-Hamas war began.¹³ HASSAN was asked why he supports ISIS but not other groups, such as al-Shabaab, Hezbollah, or the Taliban.¹⁴ HASSAN claimed the Taliban are too democratic, al-Shabaab is an offshoot of the Taliban, and Hezbollah is a Shiite group, and he is Sunni. HASSAN noted that prior to the U.S. withdrawal from Afghanistan, the Taliban made a truce and decided not to kill U.S. soldiers while the U.S. was withdrawing. HASSAN indicated he viewed working with the U.S. as

¹³ Your Affiant knows that the Israel-Hamas war began on October 7, 2023, when Hamas attacked Israel, killing over 1,000 people and taking several hundred as hostages.

¹⁴ Before answering, HASSAN asked if he could get in trouble for his beliefs and appeared hesitant to share his thoughts before speaking. Your Affiant’s review of the audio/video recording of the interview revealed that CBP Officers informed HASSAN during the interview that he could not get in trouble solely based on his beliefs, opinions, or thoughts.

going against God, and ISIS is creating the true caliphate. HASSAN further stated that he believed eventually Islam will win, and an Islamic caliphate will rule as it is written in the Quran.

55. In addition to reviewing the CBP report documenting HASSAN's interview and related preliminary inspection, Your Affiant has also reviewed the audio/video recording of the interview. At one point in the interview, after being asked how he plans on carrying out God's will, HASSAN replies, "by implementing the Sharia" (i.e., Islamic law). HASSAN explained that he does not believe in democracy, and he eventually states, "what America thinks is terrorists is actually justice, and what America thinks is justice is wrongdoing."

56. HASSAN missed his flight from Chicago O'Hare to Addis Ababa, Ethiopia, and took a late evening flight from Chicago to MSP on December 29, 2024.

Interview of HASSAN'S Father

57. On January 19, 2025, HASSAN's father, A.H.A., was interviewed by a CBP Officer at MSP Airport, following his return flight from an approximate three-month trip to Kenya.

58. A.H.A. confirmed that his former wife is HASSAN's mother, who currently resides in Garissa, Kenya, with another of their sons. A.H.A. stated that neither he nor HASSAN's mother have any family who live in Somalia or Ethiopia. When asked why HASSAN would want to go to Somalia, A.H.A. appeared puzzled by the question. A.H.A. stated the only family they have, whether close or distant, live in Kenya. When asked if A.H.A. knew HASSAN had plans to travel to Somalia,

A.H.A. stated he did not, contrary to HASSAN's claim during his December 29, 2024 CBP interview.

HASSAN's @expand_my_state1 TikTok Account

59. Your Affiant believes HASSAN is the user of TikTok account *@expand_my_state1*. Specifically, on or about November 19, 2024, an open-source review of the *@expand_my_state1* account revealed the profile photo to match the profile photo of the *Qays Man* account at that time. Additionally, the account profile for the *@expand_my_state1* account included Arabic text which translated to "*Brother Abdisatar,*" which matches HASSAN's first name. The account profile also included additional Arabic text which translated to "*The Islamic State is remaining and remaining.*" Additionally, information obtained from TikTok in February 2025 showed that telephone numbers or email addresses known to be used by HASSAN were associated with an IP address used to login to the account in December 2024.

60. On January 2, 2025, Your Affiant reviewed HASSAN's TikTok account *@expand_my_state1* via open source. The profile photo for the account had been changed to a photo which resembled that of HASSAN, although with overwritten Arabic text that blocked out part of the face (as depicted further below). The profile for the account also included Arabic text which translated to "*Somalia,*" as well as English text stating "*I only support 1 organization ISLAM.*"

61. Review of HASSAN's *@expand_my_state1* account revealed that HASSAN had posted a video during the evening of January 1, 2025 which contained an image of Shamsud-Din Jabbar, who had been identified as conducting the ISIS-

inspired terrorist attack in New Orleans, Louisiana, during the early morning hours of January 1, 2025, which killed 14 people and injured dozens more. Open-source outlets reported that Jabbar drove a pickup truck flying the ISIS flag through barricades and into a crowd of pedestrians, and then opened fire on police before eventually being killed. Jabbar was later found to have posted multiple videos claiming to have joined or otherwise been inspired by ISIS. Along with the image of Jabbar, the video posted by HASSAN's *@expand_my_state1* account also consisted of audio from a nasheed that included rapid gunfire and other sounds of a militant nature. HASSAN added a caption to the post in the Somali language, which translated to *"The Muhaajid that killed the Americans."* In response to another TikTok user's comment on the video, HASSAN replied in the Somali language, which translated to *"Amen, it is the legend that killed Americans yesterday."* In response to yet another TikTok user's comment on the video, HASSAN replied in the Arabic language, which translated to *"He is the man who destroyed the Americans yesterday."*



62. On January 3, 2025, Your Affiant again reviewed HASSAN's TikTok account *@expand_my_state1* via open source. The English text in the account profile was noted to have been changed from “*I only support 1 organization ISLAM*” to “*I only support 1 organization ISLAMIC STATE*” (as depicted below). A review of the post containing the video with the image of Jabbar revealed that in response to an additional comment from another TikTok user, HASSAN replied in the Somali language, which translated to “*He ran over 45 people and open fire on police.*”

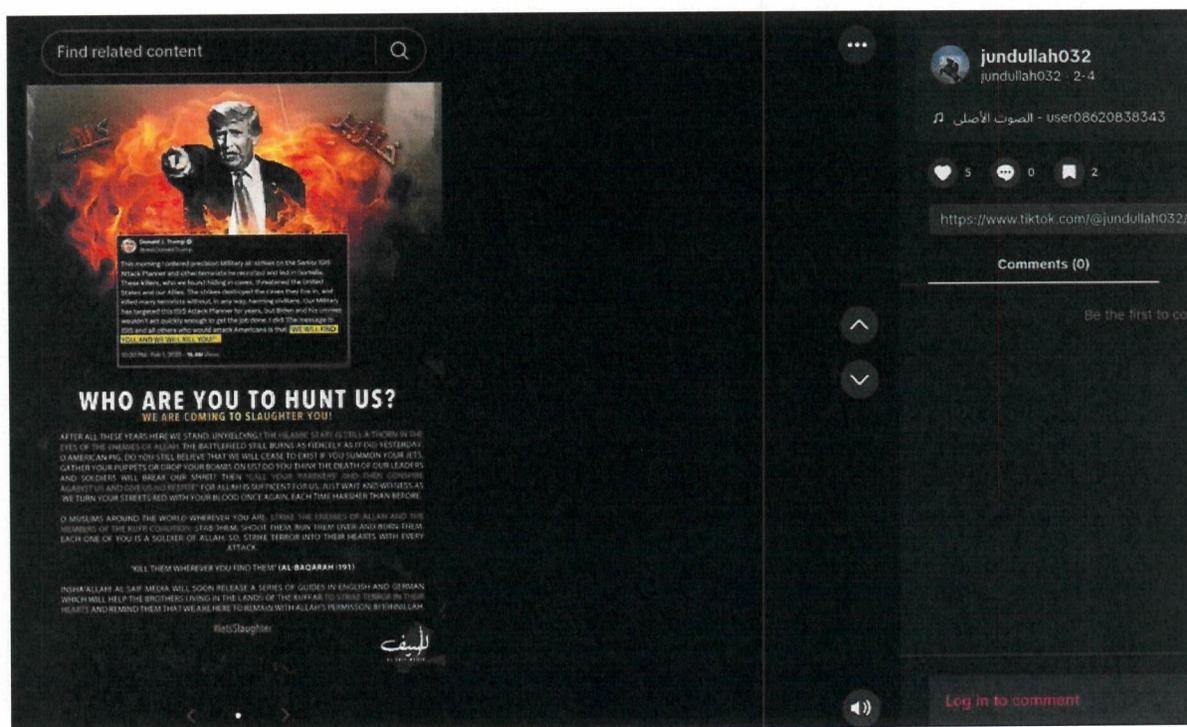


HASSAN's @jundullah032 TikTok Account

63. On February 19, 2025, Your Affiant conducted open-source searches on telephone number 763-xxx-9920, which was listed as HASSAN's telephone number in the CBP report documenting his interview and inspection on December 29, 2024. The open-source searches revealed a TikTok account associated with the telephone number with user name *@jundullah032*, which Your Affiant then reviewed via open source.

64. On or about February 4, 2025, the *@jundullah032* account posted a video containing audio from a nasheed and a digital poster (depicted below) from Al Saif

Media,¹⁵ which depicted U.S. President Trump amidst flames and above an apparent social media post by President Trump, which stated in part “a message to ISIS and others who might attack Americans,” that “WE WILL FIND YOU AND WE WILL KILL YOU.” The digital poster contained English text, “WHO ARE YOU TO HUNT US? - WE ARE COMING TO SLAUGHTER YOU!” The digital poster also contained English text calling for “Muslims around the world” to “Strike the enemies of Allah and the members of the kufr coalition.” The digital poster also provided a quote attributed to a verse from the Quran: “Kill them wherever you find them,” and a hashtag of “#letsSlaughter” at the bottom of the digital poster.



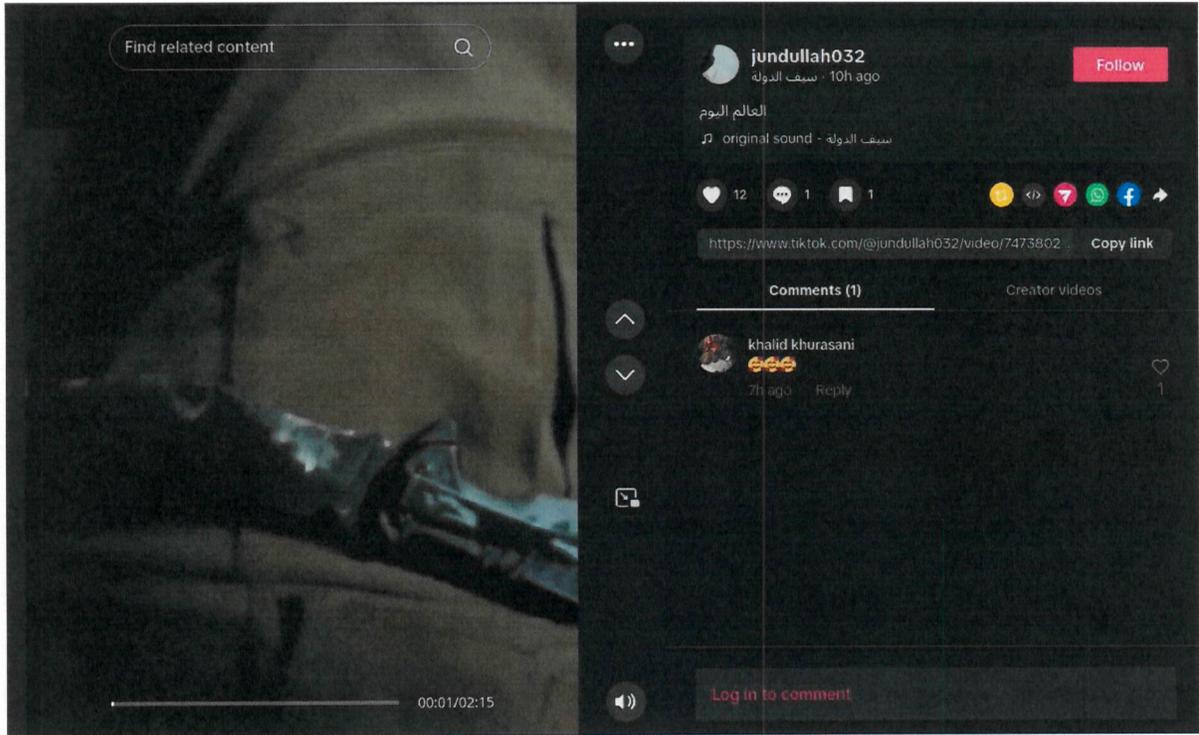
¹⁵ Your Affiant knows, based on training and experience, that Al Saif Media is a pro-ISIS media outlet.

65. Additionally, on or about February 4, 2025, the @jundullah032 account posted a video which contained audio from a nasheed and an image entitled “*Islamic State Global Operations - January 2025*,” which included figures for the number of “*Claimed Attacks*” and “*Unclaimed Attacks*.”

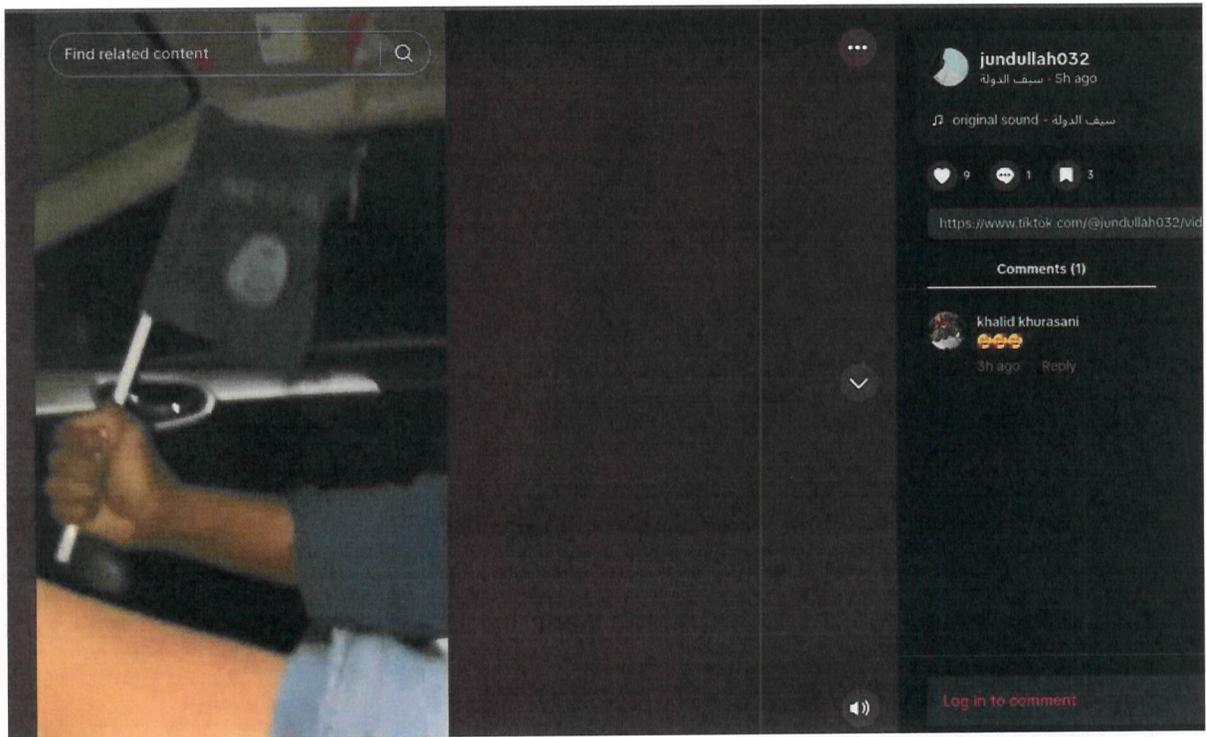
66. On or about the early morning of February 21, 2025, the @jundullah032 account posted four videos, all of which appeared to have been recorded while an individual was driving a vehicle, and they included audio from various nasheeds. In the first video, a crack along the windshield of the vehicle is visible. In the second video, the vehicle’s steering wheel is momentarily visible, and depicts the emblem of what Your Affiant recognized as a Nissan automobile.

67. Your Affiant queried HASSAN’s records in the Minnesota Driver and Vehicle Services database, and learned that HASSAN’s only registered vehicle is a 2013 Nissan Sentra. On February 26, 2025, Your Affiant reviewed a photograph taken by FBI personnel conducting surveillance of HASSAN’s vehicle and observed a crack in the windshield of the Nissan Sentra that was consistent with the crack in the windshield visible in the video posted by the @jundullah032 account.

68. The third video posted included a caption in Arabic which, according to a Somali linguist, means “*The world now*.” At various points in the video, a knife is shown sitting on the lap of an individual, who appears to be driving the vehicle, as depicted below.



69. The fourth video posted includes footage of an individual holding an ISIS flag while driving the vehicle, as depicted below.



70. During the afternoon of February 26, 2025, FBI personnel conducting physical surveillance observed HASSAN driving the Nissan Sentra (with the cracked windshield) while holding in his right hand a black ISIS flag with white writing, the description of which appears to be similar to the ISIS flag observed in the video described above. Surveillance personnel noted that HASSAN held the ISIS flag in his hand during the entire commute.

71. Based on the totality of the facts and circumstances herein, and on Your Affiant's training, experience, and knowledge of the ongoing investigation, Your Affiant has probable cause to believe that HASSAN's attempted travel to Somalia on December 13, and December 29, 2024, as well as his other actions and statements, evidence his intent to provide material support to ISIS, a designated foreign terrorist organization.

Request for Sealing

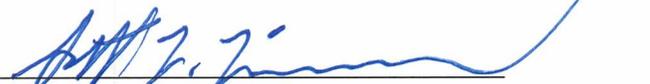
72. I respectfully request that the Court order this Affidavit sealed pending further proceedings in this matter. Your Affiant believes that HASSAN may not be fully aware of the FBI's investigation, and the FBI has not yet identified all potential perpetrators and/or co-conspirators in the crime(s) being actively investigated. Additionally, the Affidavit contains detailed investigative information that is not publicly known, and the premature disclosure of the information or this investigation will seriously jeopardize the integrity of the FBI's ongoing investigation, hamper its efforts to pursue leads, and possibly provide as-yet unknown perpetrators and/or co-

conspirators with cause to flee and/or destroy evidence, much of which is digitally stored on computers and/or social media accounts.

CONCLUSION

73. Based on all the foregoing, there is probable cause to believe that violations of 18 U.S.C. § 2339B (attempting to provide material support to a designated foreign terrorist organization) have been committed by HASSAN.

Respectfully submitted,



Scott L. Zimmerman
Special Agent, FBI

SUBSCRIBED and SWORN to before me by reliable electronic means (Zoom and email), pursuant to Fed. R. Crim. P. 41(d)(3), on February 27, 2025



DOUGLAS L. MICKO
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 25-mj-104 (DLM)

UNITED STATES OF AMERICA) **Sealed Under LR 49.1(d)**
)
) v. GOVERNMENT'S PETITION TO
) SEAL DOCUMENTS
ABDISATAR AHMED HASSAN)

The United States, pursuant to LR 49.1(d), hereby respectfully petitions this Court for an Order authorizing the sealing of certain documents in the above-entitled matter. The United States respectfully requests that the Court authorize the sealing of the Complaint, Arrest Warrant, the Affidavit of Scott L. Zimmerman in support thereof, and this Petition to Seal, for a period of one year from the date of the Court's Order, based on the reasons stated herein.

1. This matter involves an ongoing national security investigation into alleged violations of 18 U.S.C. § 2339B (attempting to provide material support and resources to a designated foreign terrorist organization). The ongoing criminal investigation also involves attempted travel from the United States to Somalia to join and/or provide material support to ISIS, a designated foreign terrorist organization.

2. The Affidavit of FBI Special Agent Scott L. Zimmerman, submitted in support of the Complaint Warrant, sets forth facts regarding the ongoing criminal investigation and alleged acts and offenses of a specific perpetrator, and potential co-conspirators, for whom there is probable cause to believe has committed the criminal offense listed above.

3. The documents presented to this Court for *in camera* review include detailed investigative information of the alleged offense and witness(es) and potential evidence. Premature disclosure of the information could jeopardize the ongoing investigation into the alleged criminal offenses and potentially the privacy of individuals who may ultimately not be indicted.

4. Nondisclosure of the documents is necessary to prevent the ongoing investigation from being compromised and for the safety of officers conducting the investigation and who will be effecting the arrest of the defendant. Immediate public filing of the warrant documents would, among other things, compromise details about the nature, extent, and scope of the investigation; hinder post-execution investigation into the criminal acts described in the supporting Affidavit, including the pursuit of leads developed as a result of executing the warrant itself; and alert targets known and unknown about the nature, extent, and scope of the investigation. Compromising the pursuit of alleged criminal activity during the active investigative stage would also provide witnesses, subjects, and targets, known and unknown, an opportunity to conceal or destroy evidence or otherwise obstruct the investigation, change patterns of behavior, notify potential co-conspirators, flee the jurisdiction, ascertain other likely targeted places to be searched, and/or seek to intimidate or retaliate against individuals whom they believe, erroneously or not, are cooperating with law enforcement.

5. The documents also contain identifying information of, and circumstances relating to, an individual or individuals allegedly involved in criminal

activity in some way who may not be indicted in this case. Nondisclosure of the documents at this stage is also necessary to protect their identity and/or to minimize the substantial risk that revelation of details set forth in the documents could cause to their reputation.

6. The Court's power to prevent disclosure of its files, especially for a limited period of time, is well established, and has been recognized by the United States Supreme Court and the Eighth Circuit. *See Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978); *In re Search Warrant for Secretarial Area Outside Office of Gunn*, 855 F.2d 569, 574 (8th Cir. 1988).

For all the foregoing reasons and those stated in the Affidavit of SA Scott L. Zimmerman, the United States respectfully requests that the Court grant its Petition to Seal Documents and order that the Complaint, Arrest Warrant, the Affidavit of Scott L. Zimmerman in support thereof, and this Petition to Seal, be sealed for a period of one year from the date of this Court's Order, or until February 27, 2026, whichever is later.

Dated: February 27, 2025

Respectfully submitted,

LISA D. KIRKPATRICK
Acting United States Attorney

BY: /s/ Benjamin Bejar
BENJAMIN BEJAR
Assistant United States Attorney
District of Minnesota

