

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAFYA ROE YASSIN,

[DOB: 07/29/1977]

Defendant.

Case No. **16-3024-01-CR-S-MDH**

COUNT ONE:

18 U.S.C. §§ 371

(Conspiracy)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

COUNTS TWO and THREE:

18 U.S.C. §§ 875(c) and 2

(Interstate threatening communications)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

\$100 Mandatory Special Assessment
on each count

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy)

The Conspiracy and its Objects

1. Beginning in or before at least May 2015, the exact date unknown to the grand jury, until on or about February 18, 2016, in the Western District of Missouri, and elsewhere, defendant SAFYA ROE YASSIN knowingly conspired and agreed with one or more other persons to commit an offense against the United States, that is: to commit the crime of solicitation to commit a crime of violence in violation of Title 18, United States Code, Section 373.

Manner and Means of the Conspiracy

2. It was part of the conspiracy that YASSIN and one or more other persons would maintain Twitter accounts to provide information that they believed to be from the Islamic State of Iraq and the Levant (ISIL) to followers on Twitter, including threats and solicitations of violence against certain United States law enforcement employees and current and former servicepersons in the United States military.

3. It was further part of the conspiracy that when Twitter would suspend an account for violations of its terms of service, YASSIN and one or more other persons would create new accounts in a manner that could be readily identified such that followers of prior accounts could find the new accounts.

4. It was further part of the conspiracy that when new accounts were established, YASSIN and one or more other persons would promote the newly created Twitter accounts of other co-conspirators to maintain a constant presence of Twitter accounts providing information that they believed to be from ISIL, including threats and solicitations of violence against current and former officers and employees of the United States, for interested followers despite Twitter's constant suspension of accounts posting such content.

Overt Acts

5. In furtherance of the conspiracy and to effect the objects of the conspiracy, YASSIN committed and caused to be committed the overt acts listed in paragraphs 6 through 7, among others, in the Western District of Missouri, and elsewhere.

6. On or about August 24, 2015, YASSIN, posted on Twitter a message previously posted by another user with the explicit phrase "Wanted to kill" followed by the first and last name, status as an employee of the Federal Bureau of Investigation, city of residence, zip code,

and phone number of Victim 1, and then, in the same communication, repeated the same explicit “Wanted to kill” phrase followed by the first and last name, status as an employee of the Federal Bureau of Investigation, city of residence, zip code, and phone number of Victim 2.

7. On or about October 8, 2015, YASSIN, posted on Twitter a message previously posted by another user that contained a link to a document with the name and home address for a former United States service member Victim 3, photos of Victim 3 with his family, and the names of Victim 3’s spouse and children along with the explicit phrase “to eventually hunt him down & kill him.” The document also contained the name and home address of Victim 4, a former United States service member who had been the previous target of solicitations to commit a crime of violence and threats on social media.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(August 24, 2015 Interstate Threatening Communication)

10. The factual allegations in paragraphs 2 through 7 are incorporated herein by reference.

11. On or about August 24, 2015, in the Western District of Missouri, and elsewhere, defendant SAFYA ROE YASSIN, with the intent to threaten, and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate and foreign commerce via the Internet, a communication containing a threat to injure the person of another, that is, a communication with the explicit phrase “Wanted to kill” followed by the first and last name, status as an employee of the Federal Bureau of Investigation, city of residence, zip code, and phone number of Victim 1, and then, in the same communication, repeated the same explicit “Wanted to kill” phrase followed by the first and last name, status as an employee of the Federal

Bureau of Investigation, city of residence, zip code, and phone number of Victim 2.

All in violation of Title 18, United States Code, Sections 875(c) and 2.

COUNT THREE
(October 8, 2015 Interstate Threatening Communication)

14. The factual allegations in paragraphs 2 through 7 are incorporated herein by reference.

15. On or about October 8, 2015, in the Western District of Missouri, and elsewhere, defendant SAFYA ROE YASSIN, with the intent to threaten, and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate and foreign commerce via the Internet, a communication containing a threat to injure the person of another, that is, a communication containing a link to a document with the name and home address for a former United States service member Victim 3, photos of Victim 3 with his family, and the names of Victim 3's spouse and children along with the explicit phrase "to eventually hunt him down & kill him," as well as the name and home address of Victim 4, a former United States service member who had been the previous target of threats.

All in violation of Title 18, United States Code, Sections 875(c) and 2.

A TRUE BILL.

/s/ Linda S. Jordan
FOREPERSON OF THE GRAND JURY

/s/ Brian P. Casey
Brian P. Casey
Assistant United States Attorney

/s/ Abram McGull II
Abram McGull II
Assistant United States Attorney

Dated: 07/19/2016
Springfield, Missouri