

APPROVED: Geor. D. Turner  
GEORGE D. TURNER  
Assistant United States Attorney

BEFORE: THE HONORABLE BARBARA MOSES  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA : SEALED COMPLAINT  
- v. - : Violations of  
HARAFI HUSSEIN ABDI, : 18 U.S.C. §§ 2339B,  
 : 2339D, 924(c), 371, 2,  
Defendant. : & 3238

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STATE OF NEW YORK )  
COUNTY OF NEW YORK ) ss.:  
SOUTHERN DISTRICT OF NEW YORK )

JONATHAN SCOTT, being duly sworn, deposes and says that he is a Special Agent of the Federal Bureau of Investigation ("FBI") currently assigned to the FBI's New York Joint Terrorism Task Force ("JTTF"), and charges as follows:

**COUNT ONE**  
**(Conspiracy to Provide Material Support and Resources to a Designated Foreign Terrorist Organization)**

1. From in or about 2015, up to and including in or about August 2017, in Somalia and elsewhere, and in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, HARAFI HUSSEIN ABDI, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, together with others known and unknown, did knowingly combine, conspire, confederate, and agree together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including

personnel and services, to a foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Complaint.

2. It was a part and an object of the conspiracy that HARAFI HUSSEIN ABDI, the defendant, and others known and unknown, would and did knowingly provide, and attempt to provide, ISIS with "material support or resources," including personnel and services, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

#### Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, HARAFI HUSSEIN ABDI, the defendant, and others known and unknown, committed the following overt acts, among others:

a. Between in or about 2015 and in or about August 2017, ABDI joined a group of ISIS fighters at an ISIS camp in Somalia.

b. Between in or about 2015 and in or about August 2017, ABDI received military-type training, including regarding the use of AK-47 assault rifles, at an ISIS camp in Somalia.

c. Between in or about 2015 and in or about August 2017, on multiple occasions, ABDI carried an AK-47 assault rifle while engaged in activities on behalf of ISIS in Somalia.

d. On or about January 21, 2017, ABDI posted on Facebook an audio clip in which ABDI stated, in part: "Khilafa

movement. . . . Fly through America on our way to shoot New York up. . . . We going to come and blow New York up."

(Title 18, United States Code, Sections 2339B and 3238.)

**COUNT TWO**

**(Provision of Material Support and Resources to a Designated Foreign Terrorist Organization)**

4. From in or about 2015, up to and including in or about August 2017, in Somalia and elsewhere, and in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, HARAFU HUSSEIN ABDI, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, did knowingly provide, and attempt to provide, "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, namely, ISIS, which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the INA, and is currently designated as such as of the date of the filing of this Complaint, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), to wit, ABDI joined, trained with, and worked on behalf of a group of ISIS fighters at an ISIS camp in Somalia.

(Title 18, United States Code, Sections 2339B, 2, and 3238.)

**COUNT THREE**

**(Conspiracy to Receive Military-Type Training from a Designated Foreign Terrorist Organization)**

5. From in or about 2015, up to and including in or about August 2017, in Somalia and elsewhere, and in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, HARAFU HUSSEIN ABDI, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, together

with others known and unknown, did knowingly combine, conspire, confederate, and agree together and with each other to receive military-type training from and on behalf of ISIS, which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization.

6. It was a part and an object of the conspiracy that HARAFA HUSSEIN ABDI, the defendant, and others known and unknown, would and did knowingly receive military-type training from and on behalf of ISIS, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

#### Overt Acts

7. In furtherance of the conspiracy and to effect the illegal object thereof, HARAFA HUSSEIN ABDI, the defendant, and others known and unknown, committed the overt acts set forth in Paragraph 3 above, which are fully incorporated by reference herein, among others.

(Title 18, United States Code, Sections 371, 2339D, and 3238.)

#### COUNT FOUR

#### **(Receipt of Military-Type Training from a Designated Foreign Terrorist Organization)**

8. From in or about 2015, up to and including in or about August 2017, in Somalia and elsewhere, and in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, HARAFA HUSSEIN ABDI, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, did knowingly receive, and attempt to receive, military-type training from and on behalf of ISIS, which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, to wit, ABDI received training in the

use of firearms, including AK-47 assault rifles, at an ISIS camp in Somalia.

(Title 18, United States Code, Sections 2339D, 2, and 3238.)

**COUNT FIVE**  
**(Possessing, Carrying, and Using Firearms During and  
in Relation to a Crime of Violence)**

9. From at least in or about 2015, up to and including in or about August 2017, in Somalia and elsewhere, and in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, HARAFA HUSSEIN ABDI, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the offenses charged in Counts One through Four of this Complaint, did knowingly use and carry a firearm, and, in furtherance of such crimes, did knowingly possess, carry, and use a firearm, to wit, an AK-47 assault rifle that was capable of automatically firing more than one shot without manual reloading by a single function of the trigger.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (A)(ii), (A)(iii), (B)(i) and (B)(ii), 2, and 3238.)

The bases for my knowledge and the foregoing charges are as follows:

10. I am a Special Agent with the FBI, and I have been assigned to the JTTF since 2006. I am currently assigned to a counterterrorism squad within the JTTF principally responsible for investigating international crimes of terrorism occurring in or originating from East Africa. Through my training and experience, I have become knowledgeable about criminal activity, particularly violations of the federal terrorism statutes. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers and other individuals, and upon my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses

cited above, it does not include all the facts that I have learned during the course of the investigation. Where the contents of conversations with others and statements by others are reported herein, they are reported in substance and in part, except where otherwise indicated.

### Overview

11. As set forth herein, there is probable cause to believe that HARAFU HUSSEIN ABDI, the defendant, is a U.S. citizen who left the United States for Africa in 2015, joined a group of ISIS fighters at an ISIS camp in Somalia, carried an AK-47 assault rifle while he was with the ISIS group, received training at the ISIS camp on using the AK-47, and has threatened to carry out violent attacks in New York City on behalf of ISIS. On or about August 26, 2017, ABDI was arrested by Somali authorities in Somalia based on ABDI's suspected activities for and on behalf of ISIS. As described in greater detail below, the evidence of ABDI's illicit activities in support of ISIS includes, in substance and in part, the following:

a. Travel records show that ABDI departed the United States bound for Africa in 2015, and that he has not returned to the United States. See infra ¶ 13(f).

b. During Mirandized interviews of ABDI while in Somali custody, ABDI admitted, in substance and among other things, that: ABDI traveled from the United States to Africa in 2015; ABDI subsequently joined a group of ISIS fighters (the "ISIS Group") at an ISIS training camp in the Puntland region of Somalia; during his time with the ISIS Group, ABDI regularly carried an AK-47 and received training from the ISIS Group on how to use it; ABDI worked in the "media" wing of the ISIS Group and filmed footage of the ISIS Group for dissemination by a pro-ISIS media outlet; in or around the summer of 2017, ABDI left the ISIS Group and traveled to Hargeisa, Somalia, where he was later arrested. See infra ¶ 15.

c. ABDI appears to use a particular Facebook account with username "Heat Hardmarki" (the "Abdi Facebook Account"). See infra ¶¶ 19-24. In November 2016, ABDI sent a message from the Abdi Facebook Account to another Facebook user indicating that he had left the United States and joined the "Islamic state." See infra ¶ 25(a). A few days later, ABDI

sent a photograph to another Facebook user that appears to show ABDI carrying an AK-47 in a setting consistent with locations in Somalia. See infra ¶ 25(b). ABDI explained to the other user that he had made "hijra" – an Arabic term commonly used by ISIS supporters to refer to traveling overseas to join ISIS and engage in jihad. See infra ¶ 25(b)(iv). The Abdi Facebook Account also contains various other images and postings indicative of ABDI's support for ISIS, violent jihad, terrorism, and martyrdom. See infra ¶¶ 25(c)-(j). For example, in the course of messages with another Facebook user in or about January 2017, ABDI posted an audio clip in which he expressed his desire to shoot and behead non-Muslims, to "shoot New York up," and to "blow New York up." See infra ¶ 25(c). ABDI has disseminated that audio clip to at least approximately 20 other Facebook users. See infra ¶ 25(d).

d. In or about September 2016, a self-proclaimed ISIS media outlet posted online a video (the "Video") that appears to show a group of ISIS fighters in a setting consistent with Somalia engaging in various activities, including drilling, marching, and praying. See infra ¶¶ 16-17. The ISIS fighters are armed with AK-47s and at least one rocket-propelled grenade ("RPG") launcher. See infra ¶¶ 17(c), (e). Certain of the fighters address the camera during the Video, pledging allegiance to and promoting ISIS. See infra ¶ 17. During his post-arrest interviews, ABDI stated, in substance and in part, that the Video depicts the ISIS Group that he joined and that he filmed portions of the Video; ABDI also identified one of the individuals who addresses the camera as himself. See infra ¶ 18. The individual identified as ABDI is carrying an AK-47 and makes a speech promoting ISIS and urging others to join and fight for ISIS. See infra ¶ 17(f).

e. The content of a cellphone seized from ABDI at or around the time of his arrest includes chats on an encrypted messaging application ("Application-1") between an account associated with ABDI (the "Abdi Application-1 Account") and another Application-1 user. See infra ¶ 27. In the course of those chats, in or about August 2017, ABDI indicated, in substance and in part, that while he had left the ISIS Group, he would "never" leave "jihad." See infra ¶¶ 27(b)(ii)-(iii). The cellphone seized from ABDI also contains various pro-ISIS propaganda videos, images, and other content indicative of ABDI's support for ISIS. See infra ¶ 27(c).

## The Islamic State of Iraq and al-Sham

12. Based on my training and experience, including my personal participation in this and other investigations involving ISIS, my conversations with other law enforcement agents who have been involved in ISIS-related investigations, and my review of publicly available materials, I understand the following:

a. On October 15, 2004, the U.S. Secretary of State 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 INA and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA 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 ("ISIL") as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham ("ISIS" - which is how the FTO will be referenced herein), 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. In an audio recording publicly released on June 29, 2014, ISIS announced a formal change of its name to the Islamic State. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

b. The U.S. State Department has reported that, among other things, ISIS has committed systematic abuses of human rights and violations of international law, including indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of their religion, nationality, or ethnicity, kidnapping of civilians, forced displacement of Shia communities and minority groups, killing and maiming of children, rape, and other forms of sexual violence. According to the State Department, ISIS has recruited thousands of foreign fighters from across the globe to assist with its efforts to expand its so-called caliphate in Iraq, Syria, and other locations in Africa and the Middle East, and



has leveraged technology to spread its violent extremist ideology and for incitement to commit terrorist acts.

c. On or about September 21, 2014, now-deceased ISIS spokesperson Abu Muhammad al-Adnani called for attacks against citizens – civilian or military – of the countries participating in the United States-led coalition against ISIS.

d. To gain supporters, ISIS, like many other terrorist organizations, spreads its message using social media, Internet platforms, and email. Using these platforms, ISIS posts and circulates videos and updates of events in Syria, Iraq, and other ISIS-occupied areas, in English and Arabic, as well as other languages, to draw support to its cause.

e. ISIS has encouraged followers who are unable to travel to the Middle East to instead conduct attacks in other countries. For example, on or about March 31, 2015, the user of Twitter account @AbuHu55ain\_, believed to be used at the time by an ISIS member located in Syria, tweeted: "Lone Wolfs Rise Up"; "If you can't make the hijrah, dont sit at home & give up . . . ignite a bomb, stab a kaffir, or shoot a politican!"; "if you came here, you'd be on the frontline fighting, right? But u couldn't come here, so why not fight the kuffar over there?"; and "i always see in the media brothers getting caught making hijrah, brothers know that your jihad is not over just because you got stopped."<sup>1</sup>

f. ISIS has disseminated a wide variety of recruiting materials and propaganda through social media. These include photographs and videos depicting ISIS's activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS and members of other Islamic extremist organizations.

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<sup>1</sup> Based on my training, experience, and participation in this investigation, I understand that "kaffir" and "kuffar" are Arabic terms generally meaning "disbelievers" (i.e., non-Muslims), and that "hijrah" (or "hijra") is an Arabic term normally used to refer to migration, but which is also used by ISIS supporters to refer to traveling to the Middle East to engage in jihad.

### ABDI's Arrest in Somalia and Post-Arrest Statements

13. Based on my review of law enforcement and government records, including travel and immigration records, and my review of reports prepared by, and my communications with, other FBI personnel, I have learned the following, in substance and in part:

a. HARAFHA HUSSEIN ABDI, the defendant, was born in Somalia in or about October 1982.

b. ABDI entered the United States in or about 1999, and became a naturalized U.S. citizen in or about 2006.

c. In or about late 2006, ABDI left the United States and traveled to Yemen.

d. In or about early 2009, ABDI attempted to travel from Yemen to the United Kingdom, but was denied entry by U.K. authorities and returned to the United States.

e. In or about 2011, U.S. law enforcement personnel interviewed ABDI after U.S. authorities noticed certain apparent irregularities in an application submitted by ABDI for a U.S. passport. In the course of that interview, ABDI declined on multiple occasions to provide information regarding the nature of his activities while in Yemen.

f. On or about July 17, 2015, ABDI flew from Minneapolis, Minnesota to Dallas, Texas, and then boarded a flight in Dallas bound for Ethiopia, via Qatar. There is no record of ABDI returning to the United States since that date.

14. Through my participation in this investigation, including my communications with other FBI personnel and my review of FBI reports, including reports relating to information conveyed by Somali authorities to the FBI, I have learned, in substance and in part, that:

a. On or about August 26, 2017, in or around Hargeisa, Somali authorities arrested HARAFHA HUSSEIN ABDI, the defendant, in connection with ABDI's suspected involvement in activities for and on behalf of ISIS in Somalia.

b. ABDI was interviewed by FBI personnel while in Somali custody on or about September 7, 2017, and on or about October 7, 2017 (together, the "Interviews").

15. Based on my review of reports prepared by FBI personnel who participated in the Interviews of HARAFA HUSSEIN ABDI, the defendant, I have learned the following, in substance and in part:

a. During both Interviews, ABDI was advised of the identities of the interviewing agents and his Miranda rights, and ABDI verbally acknowledged that he understood his rights and agreed to be interviewed by the FBI.

b. ABDI said the following, in substance and among other things, in the course of the Interviews, which were conducted in English:

i. ABDI left the United States in 2015 and traveled to Africa.

ii. ABDI subsequently joined a group of ISIS fighters at an ISIS training camp in the Puntland region of Somalia (*i.e.*, the ISIS Group). The ISIS Group was affiliated

with "Sheikh Mumin."<sup>2</sup> ABDI worked in the "media" wing of the ISIS Group.

iii. The members of the ISIS Group, including ABDI, regularly carried AK-47 assault rifles, and ABDI received training regarding the AK-47 while he was with the ISIS Group. ABDI practiced shooting the AK-47 in the Somali wilderness outside the ISIS Group's camp.

iv. In or about the spring of 2017, ABDI's relationship with leadership of the ISIS Group deteriorated, and ABDI was jailed by the ISIS Group. ABDI later escaped and traveled to Hargeisa, where he was subsequently arrested by Somali authorities.<sup>3</sup>

#### **Video of ABDI with the ISIS Group**

16. Based on my review of publicly available websites, I have learned that, on or about September 16, 2016, al-Furat Media posted the Video, which is titled "Id in the

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<sup>2</sup> Based on my training, experience, and participation in this investigation, I believe that ABDI was referring to Abdiqadir Mumin, a/k/a "Sheikh Mumin" ("Mumin"), a known leader of ISIS fighters in Somalia. Based on my review of a statement issued by the U.S. State Department on or about August 31, 2016 (the "Mumin Designation Statement"), I have learned that the State Department has designated Mumin as a Specially Designated Global Terrorist under Executive Order 13224, which imposes sanctions on foreign persons and groups determined to have committed, or pose a significant risk of committing, acts of terrorism that threaten the security of U.S. nationals or the national security, foreign policy, or economy of the United States. According to the Mumin Designation Statement, Mumin is the head of a group of ISIS-linked individuals in East Africa, has set up a base in Puntland, and has expanded his cell of ISIS supporters by kidnapping young boys, indoctrinating them, and forcing them to take up militant activity.

<sup>3</sup> Additional statements made by ABDI during the Interviews are discussed in the course of this Complaint.

Frontiers of Somalia."<sup>4</sup> Through my training, experience, and review of publicly available sources, I have learned that al-Furat Media is a self-proclaimed ISIS media outlet, which disseminates pro-ISIS propaganda via the Internet.

17. Based on my review of the Video and FBI reports regarding the Video, I have the learned the following, in substance and in part:

a. The Video is approximately 17 minutes and 36 seconds in length.

b. The al-Furat Media logo and the black and white flag used by ISIS are superimposed in the background at various points during the Video.

c. The Video appears to depict a group of ISIS fighters dressed in combat gear and armed with AK-47s. Several of the fighters are holding ISIS flags. The Video shows the fighters engaging in various activities, including drilling, marching, praying, and slaughtering and butchering a camel.

d. Certain of the fighters address the camera and the other fighters during the Video in English, Arabic, and Somali, pledging allegiance to and promoting ISIS.<sup>5</sup>

e. During the Video, one of the fighters ("Fighter-1"), whose face is covered, addresses the camera in English, while holding what I recognize, based on my training and experience, as an AK-47 and an RPG launcher. Fighter-1 states, in substance and in part, that "the Caliphate of the prophet" - which I believe, based on my training, experience, and participation in this investigation, to be a reference to the Islamic State - "is now established and is spreading everywhere. Now it is right here in Somalia!" Fighter-1 later

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<sup>4</sup> Based on my training, experience, and participation in this investigation, I believe that "Id" appears to be a reference to "Eid," an Islamic holiday.

<sup>5</sup> Descriptions herein of Somali and Arabic portions of the Video are based on subtitles within the Video as well as draft translations, and accordingly are subject to revision upon the completion of finalized translations.

states, in substance and in part: "You can send all the mujahidin and you can send all the African crusaders. . . . We will kill them! We will slaughter them here. God Almighty willing, we will never stop fighting you. Everywhere we see you, we will slaughter you. We will take your women as our slaves."

f. Later during the Video, another fighter ("Fighter-2"), whose face is covered by what appears to be a white and reddish bandana, addresses the camera in English. Fighter-2 is holding what I recognize, based on my training and experience, as an AK-47. Fighter-2 states, in substance and in part: "We thank almighty God for making us His soldiers and chose us to be among the Khilafa troops."<sup>6</sup> Based on my training, experience, and participation in this investigation, I understand Fighter-2 to have been thanking Allah for allowing the group of fighters shown in the Video to be part of ISIS's troops. Fighter-2 goes on to state, in substance and in part: "[B]rothers and sisters, the Prophet, may God bless him and give him peace, told us about the coming back of the Khilafa. So do not stay behind, brother, and get on this caravan. . . . Those who believe fight in the cause of Allah, and those who reject Faith fight in the cause of Evil . . . ." Based on my training, experience, and participation in this investigation, I believe that Fighter-2 was promoting ISIS and urging others to join ISIS and fight on its behalf.

g. A third fighter ("Fighter-3") subsequently addresses the camera, speaking Somali. In the course of his speech, in substance and in part, Fighter-3 urges Somali Muslims to "unite . . . under the banner of the Islamic caliphate" and "pledge allegiance to and submit to the authority of the caliphate."

h. A fourth fighter ("Fighter-4"), standing in front of two ISIS flags, later addresses the camera, speaking Somali. In the course of his speech, in substance and in part, Fighter-4 proclaims that "the Islamic State is coming, it is here to stay, and it will reach you in your own lands," and

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<sup>6</sup> Based on my training and experience, I believe that "Khilafa" is an Arabic term that generally means "Caliphate" and is commonly used by ISIS supporters to refer to ISIS.

urges others to "pledge allegiance to the commander of the faithful, Abu-Bakr al-Baghdadi al-Qurayshi," whom I understand, through my training, experience, and review of publicly available sources, to be the current leader of ISIS.

18. Based on my review of FBI reports regarding the Interviews, I have learned that a portion of the Video was shown to HARAFHA HUSSEIN ABDI, the defendant, in the course of the Interviews, and that ABDI stated the following, in substance and in part:

a. The Video depicts the Mumin-affiliated ISIS Group that ABDI joined in the Puntland region of Somalia.

b. The individual referred to above as "Fighter-2" is ABDI. The text of the speech made by ABDI during the Video was given to ABDI by a higher-ranking member of the ISIS Group.

c. As a member of the ISIS Group's "media" wing, ABDI also filmed portions of the Video.

d. After the Video was filmed, the ISIS Group sent the footage to "Furacc," an entity that produces and disseminates such videos for ISIS groups. Based on my training, experience, and participation in this investigation, I believe that ABDI was referring to al-Furat Media.

#### **The ABDI Facebook Account**

19. The Abdi Facebook Account is the Facebook account with username "Heat Hardmarki" and a particular ten-digit user ID. Based on my review of FBI reports regarding the Interviews, I understand that, in the course of the Interviews, HARAFHA HUSSEIN ABDI, the defendant, was shown printouts from the Abdi Facebook Account, and stated that the account belongs to him.

20. Based on my review of subscriber records for the Abdi Facebook Account obtained from Facebook, I have learned, in substance and in part, that:

a. The vanity name associated with the Abdi Facebook Account is "harafaa" - which appears to be a variation of the first name of HARAFHA HUSSEIN ABDI, the defendant.

b. Between May and July 2017, the Abdi Facebook Account was accessed on approximately five occasions. The Internet Protocol ("IP") address for each of those logins resolves to locations in Somalia.<sup>7</sup>

c. One of the email accounts used to register the Abdi Facebook Account is a Yahoo account consisting of ABDI's first name; harafa@yahoo.com (the "Abdi Yahoo Account").

21. Based on my review of FBI reports regarding the Interviews, I have learned that, in the course of the Interviews, HARAFA HUSSEIN ABDI, the defendant, identified the Abdi Yahoo Account as belonging to him.

22. Based on my review of subscriber records for the Abdi Yahoo Account obtained from Yahoo, I have learned, in substance and in part, that the subscriber name associated with the Abdi Yahoo Account is "harafa abdi" and that the Abdi Yahoo Account was created in 2008 from an IP address that resolves to a location in Yemen. As set forth above, between in or about late 2006 and in or about early 2009, ABDI spent time in Yemen. See supra ¶¶ 13(c)-(d).

23. Based on my review of records obtained from the U.S. Department of State, I have learned, in substance and in part, that in or about July 2014, HARAFA HUSSEIN ABDI, the defendant, submitted an application for a U.S. passport, and that the passport application listed the Abdi Yahoo Account as ABDI's email address.

24. Based on my training, experience, and participation in this investigation, I believe that the facts set forth in paragraphs 19 through 23 above further evidence that the Abdi Facebook Account is used by HARAFA HUSSEIN ABDI, the defendant, as acknowledged by ABDI during the Interviews.

25. Based on my review of records received from Facebook pursuant to a judicially authorized search warrant, I

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<sup>7</sup> Based on my training and experience, I have learned that an IP address generally refers to a unique numerical label assigned to a digital device that accesses the Internet (e.g., a computer), and that an IP address can be used to determine the general geographic location of the device to which it is assigned.



have learned that the content stored in the Abdi Facebook Account includes, in substance and in part, the following:

a. On or about November 15, 2016, HARAFA HUSSEIN ABDI, the defendant, sent a message to another Facebook user stating: "I'm not in the United state I'm Islamic state and my leader is not a president his a khalifa."<sup>8</sup> Based on my training, experience, and participation in this investigation, I believe that ABDI was informing the other user that he was no longer in the United States, and had joined the Islamic State.

b. Also in or about November 2016, ABDI exchanged a series of messages with another Facebook user ("Facebook User-1"), which included, in substance and in part, the following:

i. On or about November 18, 2016, ABDI sent the following image ("Photo-1") to Facebook User-1:



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<sup>8</sup> Based on my training and experience, I understand "khalifa" to be an Arabic term generally meaning the leader of the Caliphate, or Islamic State.

ii. Based on my participation in this investigation, including my review of photographs of ABDI associated with law enforcement and government records, as well as the Facebook messages discussed below, I believe that the person depicted in Photo-1 is ABDI. Further, based on my review of FBI reports regarding the Interviews, I understand that, in the course of the Interviews, ABDI was shown a copy of Photo-1, and ABDI stated that the person depicted in Photo-1 is himself, and that Photo-1 was taken near the ISIS Group's training camp, while ABDI was a member of the ISIS Group. The individual in Photo-1 identified as ABDI is holding what I recognize, based on my training and experience, to be an AK-47 assault rifle.

iii. After receiving Photo-1, Facebook User-1 sent a message to ABDI, asking: "Subhanallah where r u brother?"<sup>9</sup>

iv. Later that same day (*i.e.*, November 18, 2016), ABDI responded: "I made hijra bro." As noted above, "hijra" is an Arabic term generally meaning "migration" but which is commonly used by ISIS supporters to refer to traveling overseas to join ISIS and engage in jihad. See supra n.1. I therefore believe that ABDI was informing Facebook User-1 that he had traveled overseas to join ISIS and engage in jihad. See also infra ¶¶ 25(c)(2), 25(h) (additional instances where ABDI informed other Facebook users that he had made hijra). I further believe, based on my training and experience, that the background depicted in Photo-1 is consistent with various locations in Africa, including in Somalia.

v. After stating that he had made hijra, ABDI sent another message to Facebook User-1, stating: "Get u an [Application-1] account page so we can cha[t] it up in the secret conversation." Based on my training, experience, and review of publicly available sources, I have learned that Application-1 is an electronic messaging application accessible on cellphones that enables users to send and receive encrypted messages, photos, videos, and other files.

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<sup>9</sup> Based on my training and experience, I understand "Subhanallah" to be an Arabic term generally meaning "Glory to God."

vi. ABDI further informed Facebook User-1 that "Heatholder" was his username on Application-1. On at least approximately four other occasions, over the course of 2016 and 2017, ABDI sent messages to other Facebook users similarly informing them that his username on Application-1 was "heatholder," "Heat holder," or "heat holder." See infra ¶ 27(a) (an Application-1 account with username "heat holder" was located on a cellphone seized from ABDI at arrest).

c. In or about January 2017, ABDI exchanged a series of messages with another Facebook user ("Facebook User-2"), which included, in substance and in part, the following:

i. ABDI informed Facebook User-2 that he is "African." As set forth above, ABDI was born in Somalia.

ii. Facebook User-2 asked ABDI if he "live[s] in America." ABDI replied: "Not anymore[.] Made hijra."

iii. On or about January 21, 2017, ABDI sent an audio clip consisting of rap lyrics (the "Audio Clip") to Facebook User-2. In the course of the ensuing messages, ABDI conveyed that he is the speaker on the Audio Clip. Based on my communications with an FBI agent who participated in the October 7, 2017 interview of ABDI in Somalia ("Agent-1"), I understand that Agent-1 recognizes ABDI's voice on the Audio Clip. Based on my review of the Audio Clip, which is approximately one minute in length, I have learned the following, in substance and in part:

1. The Audio Clip begins with what sounds like a gunshot in the background. The speaker (believed to be ABDI, as explained above) then states: "Black soldiers holding up the black flag. Got the black gloves on with the black mask."<sup>10</sup> Based on my training, experience, and participation in this investigation, I believe that the "black flag" was a reference to the flag used by ISIS.

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<sup>10</sup> The descriptions and quotations of the Audio Clip set forth herein are based on review of the Audio Clip and a draft transcription of the Audio Clip, and accordingly are subject to modification as a finalized transcription is prepared.

2. ABDI goes on to state: "[H]ollow tips put a hole in your Catholic vest, and chop his head off let it rest on his Catholic chest. Khilafa movement. We don't care who you with or who you be with. Everything we say we do we prove it." Based on my training, experience, and participation in this investigation, I believe that "hollow tips" was a reference to a particular type of bullets; that these lyrics promote beheading non-Muslims ("chop his head off let it rest on his Catholic chest"); and that "Khilafa movement" was a reference to ISIS and violent jihad.

3. Later during the Audio Clip, ABDI states that "[w]e going to carry on jihad."

4. As the Audio Clip continues, ABDI states: "Fly through America on our way to shoot New York up. They trying to shut this thing. We ain't going. We going to come blow New York up." During these lyrics, what sounds like automatic gunfire and an explosion can be heard in the background.

iv. After receiving the Audio Clip from ABDI, Facebook User-2 indicated that he had listened to the Audio Clip, and sent messages to ABDI stating that "the words to your song is not islam" and "You talk about shooting up New York and chopping non muslim heads off. You speaking that ISIS bullshit . . . That's not islam." In response, ABDI sent messages stating: "I'm a extreme ha"; "Terrorizing kuffar who's at war [with] Muslims is Islam ha"; "Fighting back the kuffar who's at war with Muslims if is not islam then i don't know wats Islam"; and "Do u have any idea wat American war jets do to muslim civilians in Syria, iraq, and Yemen Afghanistan etc."

d. Over the course of 2016 and 2017, ABDI sent the Audio Clip to at least approximately 20 other Facebook users. For example, in or about February 2017, ABDI sent the Audio Clip to another Facebook user, and subsequently sent messages to the other user describing the Audio Clip as a "rap nasheed" intended to "terrorize kuffar."

e. On or about September 26, 2016, ABDI uploaded the following image ("Image-1") as his profile picture:



Image-1 appears to depict flames rising from an explosion, with the flames forming the shape of a hand with the index finger extended, which I recognize, based on my training and experience, as a gesture commonly used by ISIS supporters to symbolize support for ISIS.

f. On or about October 7, 2016, ABDI posted a comment stating: "Make hijra inshAllah it will help, especially to a pure Islamic state." Based on my training, experience, and participation in this investigation, I believe that ABDI was encouraging others to travel overseas to join ISIS.

g. Also on or about November 12, 2016, ABDI posted a comment stating: "The Islamic state is around The corner to end this B-S it will flip the script and show the true face of the game that's being played." In or about January 2017, ABDI posted an image displaying what I recognize, based on my training and experience, as a circular depiction of the seal of Muhammad that appears on the flag used by ISIS, along with the phrase, "Game Over."

h. On or about January 16, 2017, ABDI sent a message to another Facebook user stating: "34 moved from America

and made hijra." As set forth above, ABDI was born in or about October 1982, and was thus 34 years old at the time that this message was sent.

i. ABDI has made various other posts indicative of support for jihad, martyrdom, and radical Islamic ideology, including, among other posts, the following:

i. On or about October 14, 2016, ABDI posted an image containing text relating to Anwar al-Awlaki. Through my training and experience, I know that, prior to his death in 2011, Anwar al-Awlaki was a leader of al Qaeda in the Arabian Peninsula. The image stated, in part, that al-Awlaki was "a devout religious man [who] was demonized by the USA," and that "His Intelligent talks exposed the lies of the west[,] so they murdered him, and like the mafia went after his family." The image further stated that al-Awlaki's son was "killed by a US drone strike" and that "This was a war crime."

ii. In or about January 2017, ABDI shared a post made by another Facebook user, which stated that "US special forces have killed another child of Anwar Al Awlaki...Inna lillah wainna ilayh raajiun," and warned: "America will never feel peace unless peace becomes real in the land of Muslims."

iii. On or about January 8, 2017, ABDI posted a comment stating, in part: "Allah favored the mujahidins over those who sit back wit a great reward." Based on my training and experience, I understand "mujahidin" to be an Arabic term generally referring to Islamic fighters engaged in jihad.

iv. On or about January 20, 2017, ABDI posted a comment stating, in part: "The head of the matter is Islam. It's pillar is the prayer. And it's utmost peak is jihad."

v. On or about February 26, 2017, ABDI posted an image that appears to depict an unidentified man, wearing combat fatigues, with a comment stating: "A martyr is the one who bears witness that the Shari'ah of Allah is more valuable to him than his own life."

j. On or about February 9, 2017, ABDI posted an image of an individual identified in the image as "Sheikh Abu Hamza," whom I recognize, based on my training, experience, and review of publicly available sources, to be Abu Hamza al-Masri ("Abu Hamza"), a radical Islamic cleric who was convicted in 2014, in the Southern District of New York, of terrorism offenses and sentenced to life imprisonment. The image posted by ABDI also contained text attributed to Abu Hamza, stating: "Islam is in need of lions not fairy floss Muslims that sugarcoat the deen in order to please the kuffar."<sup>11</sup> Based on my review of publicly available materials, I know that this quote is popularly attributed to Abu Hamza and commonly posted on websites that support violent jihad.

#### **Electronic Media Seized from ABDI at the Time of His Arrest**

26. Through my participation in this investigation, including my communications with other FBI personnel and my review of FBI reports, including reports relating to information conveyed by Somali authorities to the FBI, I have learned the following, in substance and in part:

a. As set forth above, HARAFA HUSSEIN ABDI, the defendant, was arrested by Somali authorities on or about August 26, 2017, in or around Hargeisa. At or around the time of ABDI's arrest, Somali authorities seized three cellphones and associated Subscriber Identity Module ("SIM") cards from ABDI (the "Abdi Electronic Media"), including a Samsung cellphone ("Cellphone-1").

b. On or about September 7, 2017, in Somalia, FBI personnel procured forensic images of the contents of the Abdi Electronic Media. The FBI subsequently transported the forensic images of the Abdi Electronic Media to the Southern District of New York.

27. Based on my review of the forensic images of the Abdi Electronic Media pursuant to a judicially authorized search warrant, as well as reports prepared by other FBI personnel

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<sup>11</sup> Based on my training and experience, I understand "deen" to be an Arabic term generally meaning the Islamic "creed."

involved in the review of those forensic images, I have learned the following, in substance and in part:

a. An Application-1 account with username "heat holder" – the Abdi Application-1 Account – is located on Cellphone-1. As set forth above, HARAFA HUSSEIN ABDI, the defendant, informed others on Facebook that he had an Application-1 account associated with that username. See supra ¶ 25(b)(iv). Further, based on my review of FBI reports regarding the Interviews, I understand that, in the course of the Interviews, ABDI identified the Abdi Application-1 Account as belonging to him. Cellphone-1 also contains multiple photographs of ABDI – which appear to be "selfies" taken by ABDI – and the Abdi Facebook Account is also located on Cellphone-1. Based on my training, experience, and participation in this investigation, including the foregoing facts, I believe that Cellphone-1 and the Abdi Application-1 Account were used by ABDI.

b. Between at least in or about May 2017 and in or about mid-August 2017, ABDI, using the Abdi Application-1 Account, exchanged messages via Application-1 with another Application-1 user with a particular username ("User-1"). Based on my review of FBI reports regarding the FBI's Interviews of ABDI, I have learned that, in the course of the Interviews, ABDI stated that one of the members of the ISIS Group was known by that username. The chats on Application-1 between ABDI and User-1 included, in substance and in part, the following:

i. On or about June 24, 2017, ABDI sent a message asking User-1 to "send me the last audio tape for the Islamic state spoken man." Based on my training, experience, and participation in this investigation, I believe that ABDI was asking User-1 to send him recent pro-ISIS propaganda from an ISIS spokesman.

ii. In or about early August 2017, after a break in the messaging exchange of more than a month, User-1 sent messages to ABDI inquiring about his wellbeing and asking, "Uh left jihad..??" As set forth above, it appears that ABDI left the ISIS Group and in or about the late summer of 2017.

iii. In response, ABDI sent a message stating: "Never that just waiting for the better." Based on my



training, experience, and participation in this investigation, I believe that ABDI was conveying that he remained committed to waging jihad.

iv. As the messaging exchange continued, User-1 sent a message to ABDI stating, in part: "Since uh went we never heard You reached any wilayat of Dawla." Based on my training and experience, I understand that "wilayat" is an Arabic term generally meaning "province" and that "Dawla" is a title commonly used by ISIS supporters to refer to the Islamic State.

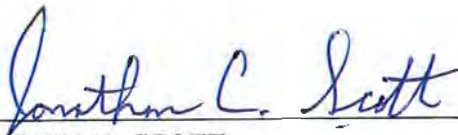
v. Later during the course of the chat, ABDI informed User-1 that he "left" after "[t]hey locked me up." As set forth above, ABDI stated during the Interviews that he left the ISIS Group after it detained him in a jail for some period of time.

c. The content of Cellphone-1 also includes what I recognize, based on my training and experience, as pro-ISIS propaganda materials. For example, Cellphone-1 contains, among other things, the following: a video that appears to show three masked men on horseback, one of whom is waving an ISIS flag, during which one of the men fires a large machinegun; multiple photographs of what appear to be ISIS fighters; multiple images of weapons, including assault rifles and explosives; a photograph of Anwar al-Awlaki; and photographs that appear to depict the bodies of individuals killed in combat.


WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of HARAFA HUSSEIN ABDI, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.

FURTHER, the Government respectfully moves for this Complaint and the arrest warrant to remain sealed, with the exception that the Complaint and arrest warrant are unsealed for the limited purpose of disclosing the existence of or disseminating the Complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant's arrest

or extradition, or as otherwise required for purposes of national security.

  
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JONATHAN SCOTT  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
9th day of January 2018

  
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THE HONORABLE BARBARA MOSES  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK