

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	No. 2:15-CR-95
	:	
Plaintiff,	:	JUDGE GRAHAM
	:	
v.	:	
	:	
ABDIRAHMAN SHEIK MOHAMUD,	:	
a.k.a. "Ayanle,"	:	
	:	
Defendant.	:	

REVISED STATEMENT OF FACTS

1. Abdirahman Sheik MOHAMUD is a 23-year-old resident of Columbus, Ohio. MOHAMUD was born in Somalia but came to the United States (U.S.) when he was approximately two years old and became a naturalized U.S. citizen on February 18, 2014.
2. An overview of MOHAMUD's criminal conduct is as follows:
3. In September of 2013, MOHAMUD sent his brother, Abdifatah ADEN, a private message praising his brother Abdifatah ADEN, who was fighting in Syria, for being a soldier and committing himself to join ADEN as a fellow foreign fighter.
4. From approximately January through April of 2014, MOHAMUD and ADEN coordinated MOHAMUD's travel into Syria, planned MOHAMUD's financial support for ADEN, and discussed MOHAMUD's plans to obtain a communication device to provide to ADEN in support of terrorist activities. MOHAMUD's planning included obtaining a U.S. passport and airline ticket, opening a bank account, gathering \$1,000 of funds on ADEN's behalf, and purchasing an internet-accessible device.
5. On February 18, 2014, MOHAMUD became a naturalized U.S. citizen. On February 25, 2014, MOHAMUD submitted a passport application to the U.S.

6. On April 8, 2014, MOHAMUD purchased a one-way ticket to Athens, Greece via Istanbul, Turkey.
7. MOHAMUD departed the U.S. on April 18, 2014 for the purpose of fighting in Syria and providing material support to the al-Nusrah Front (“al-Nusrah”), an organization that is designated by the U.S. Secretary of State as a foreign terrorist organization (FTO). MOHAMUD did not fly to Athens, rather, he disembarked in Istanbul, Turkey and did not board his connecting flight. Around the time MOHAMUD departed the U.S., he knew ADEN was in Syria fighting with the terrorist organization al-Nusrah.
8. From approximately April 19 - 25, 2014, MOHAMUD and his brother ADEN worked with multiple facilitators, who were aligned with al-Nusrah, to transport MOHAMUD from Turkey into Syria
9. On April 25, 2014, ADEN sent a private message to an associate stating that he was in Syria and that his brother MOHAMUD was also in Syria. On that same day, the al-Nusrah linked facilitators stated to one another that MOHAMED was with al-Nusrah and that MOHAMED had given \$1000 to one of the facilitators to provide to ADEN.
10. While in Syria, MOHAMUD sent a video to a U.S.-based individual along with a statement that the video included individuals who were training him in Syria. After returning to the U.S., MOHAMUD stated to a U.S.-based individual that he (MOHAMUD) received training on weapons and tactics while in Syria. MOHAMUD expressed to another U.S.-based individual that his training included how to enter a structure and kill persons inside.
11. While in Syria, MOHAMUD trained with al-Nusrah on fitness, and on the use of weapons and tactics. MOHAMUD also engaged in a firefight and expressed his desire to die fighting in Syria. However, MOHAMUD was instructed by al-Nusrah to return to the U.S. and commit an act of terrorism.
12. ADEN was killed fighting for al-Nusrah on or about June 3, 2014.

13. MOHAMUD returned to the U.S. on June 8, 2014.
14. After returning to the U.S., MOHAMUD began to plan the kidnapping and murder of U.S.-based soldiers. MOHAMUD attempted to recruit multiple individuals to participate with him in a violent attack in the U.S.
15. MOHAMUD stated to a U.S.-based individual that he returned to the U.S. and that his plan was to lay low and recruit others for his plot. MOHAMUD stated the plot was to obtain weapons in order to kill military officers or other government employees or people in uniform.
16. MOHAMUD stated to another U.S.-based individual, whom MOHAMUD attempted to recruit, that MOHAMUD's plot was to execute "something big" such as travelling to Texas to capture three or four soldiers and kill them execution style.
17. In June 2014, while MOHAMUD was overseas prior to his return to the U.S., MOHAMUD used his phone to: (1) visit the website for the Federal Bureau of Prisons; (2) conduct an internet search of the term "fort worth texas prison inmate search"; (3) conduct an internet search of the name "aafia Siddiqui"; and (4) conduct a search in Google Maps of "fmc carswell." The Federal Medical Center, Carswell is a federal prison located in Fort Worth, Texas.
18. In June 2014, after leaving Syria, MOHAMUD continued to exchange private messages with both of the al-Nusrah linked facilitators who helped MOHAMUD with his entry into Syria.
19. In September 2014, MOHAMUD instructed several U.S.-based people on how to shoot a handgun.
20. On November 23, 2014, MOHAMUD booked a flight from Columbus, Ohio to Dallas/Ft. Worth, Texas for travel on November 28, 2014, and this flight was later changed.

21. On February 3, 2015, MOHAMUD was interviewed by the FBI and stated that during an overseas trip from April to June 2014, MOHAMUD did not leave the city of Istanbul, Turkey. MOHAMUD knew this statement was false at the time he made it and that it was an important and material fact misrepresented to the FBI to hide his involvement and the involvement of others in terrorism. The false statement was willful because he acted with knowledge that his conduct was unlawful.
22. When he traveled overseas, MOHAMUD attempted to provide and provided material support and resources, including himself as personnel, property and currency, to an FTO. MOHAMUD also attempted to provide material support and resources to terrorists, knowing and intending that such material support and resources were to be used in preparation for, or in carrying out the murder of members of the uniformed services of the U.S. inside the U.S. Lastly, MOHAMUD made material false statements and representations to the FBI related to the offenses of international and domestic terrorism.
23. MOHAMUD engaged in the conduct described above knowingly and willfully and not because of accident, mistake, or other innocent reason.
24. This statement of facts includes those facts necessary to support the pleas of guilty between defendant MOHAMUD and the government. It does not include each and every fact known to the defendant or the government, and it is not intended to be a full enumeration of all the facts surrounding the defendant's case.