UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FILED UNDER SEAL

UNITED STATES OF AMERICA,	)	**INDICTMENT** CR 11-191 DWF/AJB
	)	
Plaintiff,	)	(18 U.S.C. § 2339A(a))
	)	(18 U.S.C. § 2339B(a))
v.	)	
	)	
AHMED HUSSEIN MAHAMUD,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy to Provide Material Support to Terrorists)

From on or about a date unknown through the present, in the State and District of Minnesota and elsewhere, the defendant,

AHMED HUSSEIN MAHAMUD,

did knowingly and intentionally conspire with others known and unknown to the grand jury, to provide material support and resources, namely financial support and personnel, knowing and intending that the material support and resources were to be used in preparation for and in carrying out a violation of Title 18, United States Code, Section 956(a)(1) (conspiracy to murder, kidnap, maim or injure persons in a foreign country), all in violation of Title 18, United States Code, Section 2339A(a).

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COUNT 2
(Providing Material Support to Terrorists)

On or about a date unknown, and on or about April 20, 2009, and July 27, 2009, in the State and District of Minnesota and elsewhere, the defendant,

AHMED HUSSEIN MAHAMUD,

did provide material support and resources, namely financial support and personnel, knowing and intending that the material support and resources were to be used in preparation for and in carrying out a violation of Title 18, United States Code, Section 956(a)(1) (conspiracy to murder, kidnap, maim or injure persons in a foreign country); all in violation of Title 18, United States Code, Section 2339A(a).

COUNT 3
(Conspiracy to Provide Material
Support to a Foreign Terrorist Organization)

Beginning on or about a date unknown and continuing to the present, in the State and District of Minnesota and elsewhere, the defendant

AHMED HUSSEIN MAHAMUD,

did unlawfully and knowingly conspire and agree with others, known and unknown to the grand jury, to provide material support and resources to al-Shabaab, which the U.S. Secretary of State has designated as a foreign terrorist organization since on or about February 26, 2008, and the designation of which was published in

the Federal Register on or about March 18, 2008, to wit: to knowingly provide money to al-Shabaab and personnel to work under al-Shabaab's direction and control, knowing that al-Shabaab had been designated as a foreign terrorist organization, and knowing that al-Shabaab had engaged, and engages, in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 4
(Providing Material Support to a Foreign Terrorist Organization)

On or about a date unknown, and on or about April 20, 2009, and July 27, 2009, in the State and District of Minnesota and elsewhere, the defendant,

AHMED HUSSEIN MAHAMUD,

did unlawfully and knowingly provide material support and resources to al-Shabaab, which the U.S. Secretary of State has designated as a foreign terrorist organization since on or about February 26, 2008, and the designation of which was published in the Federal Register on or about March 18, 2008, to wit: to knowingly provide money to al-Shabaab and personnel to work under al-Shabaab's direction and control, knowing that al-Shabaab had been designated as a foreign terrorist organization, and knowing that al-Shabaab had engaged, and engages, in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

FORFEITURE ALLEGATIONS

Counts 1 through 4 of this Indictment are realleged for the purpose of alleging forfeitures.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 981(a)(1)(G) and Title 28, United States Code, Section 2461, the defendant shall forfeit to the United States any and all right, title, and interest in any and all of his assets, foreign or domestic, and shall forfeit all right title and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to his violation of Counts 1, 2, 3, or 4 of the Indictment.

Pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461, if any of the above-referenced property is unavailable for forfeiture, the United States intends to forfeit substitute assets of the defendant.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON