

COUNT 2

(Conspiracy to Kill, Kidnap, Maim, and Injure)

2. From in or about September 2007 through in or about December 2008, in the State and District of Minnesota and elsewhere, the defendants,

ABDIFATAH YUSUF ISSE,
a/k/a Omar, and
SALAH OSMAN AHMED,
a/k/a Salman,

knowingly and intentionally conspired with each other and others, known and unknown to the grand jury, to kill, kidnap, and maim and injure persons outside of the United States, in violation of Title 18, United States Code, Section 956.

3. In furtherance of the conspiracy, and to effect the objects thereof, one of the co-conspirators knowingly performed the following overt act: on or about December 6, 2007, in the State and District of Minnesota, Salah Osman Ahmed boarded Northwest Airlines flight 56 from Minneapolis, Minnesota, to Amsterdam, Netherlands, with a final destination of Somalia.

COUNT 3

(False Statements)

4. On or about July 30, 2008, in the State and District of Minnesota, in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency of the United States, and in an offense involving international terrorism,

SALAH OSMAN AHMED,
a/k/a Salman,

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did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation to agents of the FBI, in violation of Title 18, United States Code, Section 1001(a)(2); that is, he stated that he did not know anyone on his flight to Somalia in December 2007, when, in fact, he traveled to Somalia together with an individual he knew, so that they could fight *jihad* in Somalia.

COUNT 4

(False Statements)

5. On or about December 8, 2008, in the State and District of Minnesota, in a matter within the jurisdiction of the FBI, an agency of the United States, and in an offense involving international terrorism,

SALAH OSMAN AHMED,
a/k/a Salman,

did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation to agents of the FBI, in violation of Title 18, United States Code, Section 1001(a)(2); that is, he stated that he traveled alone and did not know anyone on his flights to Somalia in December 2007, when, in fact, he traveled to Somalia together with an individual he knew, so that they could fight *jihad* in Somalia.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON