

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America
v.
Jihad Muhammad Ali, a/k/a "Abu Dujanah,"
Defendant(s)

Case No. 19-MJ-03950-TORRES

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2015 through on or about March 2019 in the county of Miami-Dade in the Southern District of Florida and elsewhere, the defendant(s) violated:

Code Section: 18 U.S.C. § 371
Offense Description: Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization.

This criminal complaint is based on these facts:

-SEE ATTACHED AFFIDAVIT-

[X] Continued on the attached sheet.

Complainant's signature
Special Agent Jason D. Coffey, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: Dec. 3, 2019

Judge's signature
Honorable Magistrate Judge Edwin G. Torres
Printed name and title

City and state: Miami, Florida

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jason Coffey, first being duly sworn, hereby depose and state the following:

1. I am a Special Agent (“SA”) with the United States Federal Bureau of Investigation (FBI) and have been so employed since May 2018. Among my duties as an FBI Special Agent, I am responsible for the investigation of violations of federal law, including federal laws related to national security, terrorism support activities, and terrorist acts against U.S. persons and interests. I am currently assigned to the FBI’s Joint Terrorism Task Force (“JTTF”), where my primary responsibilities include the investigation of international terrorism.

2. I am familiar with the facts set forth in this Affidavit based on my participation in the investigation; my experience and training as a Special Agent with the FBI and with the JTTF; and based on information and evidence obtained from law enforcement officers and witnesses. The information contained in this Affidavit does not include all the facts relating to the investigation and is provided for the limited purpose of establishing probable cause to believe that the defendant committed the crime described in this criminal complaint.

3. This Affidavit is made in support of a criminal complaint for the arrest of JIHAD MUHAMMAD ALI, a/k/a “Abu Dujanah” (JIHAD), a United States citizen, who did conspire to provide material support and resources to a designated foreign terrorist organization, that is, The Islamic State of Iraq and Syria (ISIS), in violation of Title 18, United States Code, Section 371.

4. Title 18, United States Code, Section 2339B, prohibits anyone from knowingly providing material support or resources to a foreign terrorist organization. To violate this section, a person must have knowledge that the organization is a designated terrorist organization (as defined in subsection (g)(6)); that the organization has engaged or engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), or that the organization has engaged or engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations

Authorization Act, Fiscal Years 1988 and 1989); that the person is a national of the United States, a permanent resident alien, or a stateless person whose habitual residence is the United States, and; after the conduct required for this offense occurred, an offender is brought back into the United States or found in the United States.

5. “Material support or resources” is defined to include “any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safe houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (one or more individuals who may be or include oneself), and transportation, except medicine or religious materials. . .”<sup>1</sup>

6. At all times relevant to this complaint, JIHAD was a citizen of the United States.

#### **PROBABLE CAUSE**

7. On or about October 15, 2004, the United States Secretary of State designated al-Qa’ida in Iraq, then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of al-Qa’ida in Iraq as a FTO under Section 219 of the Immigration and Nationality Act 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 Foreign Terrorist Organization 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-

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<sup>1</sup> 18 U.S.C. §§ 2339B(g)(4), 2339A(b)(1).

Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the Foreign Terrorist Organization listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated Foreign Terrorist Organization. Until his death in October 2019, Abu Bakr al-Baghdadi was the leader of ISIS.

8. According to his birth certificate, JIHAD was born on November 30, 2000, in the Town of North Hempstead, Nassau County, New York. JIHAD's father moved the family to Trinidad and Tobago (TTO) in 2008 when he was seven years old. In March 2015, JIHAD's father, EMRAAN ALI (EMRAAN), took his wife, one stepchild and five children to Syria to join ISIS, where both EMRAAN and JIHAD received military and religious training and served as fighters in support of the terrorist organization. JIHAD continued to serve as a fighter for ISIS until the last battles in its last stronghold in Baghuz, Syria. JIHAD finally surrendered to Syrian Defense Forces (SDF) near Baghuz in March 2019, during the last sustained ISIS battles to maintain territory in Syria.

9. In August and September 2019, JIHAD agreed to provide voluntarily interviews with FBI agents in Syria. After being advised of his *Miranda* rights each time and choosing to make statements without the presence of an attorney, JIHAD made multiple statements. JIHAD told agents that he traveled with his family to Syria through Brazil and Turkey. In Turkey, prior to crossing the border into Syria, his father asked each member of the family if they wanted to join ISIS. JIHAD stated that he did. Interviewing agents asked if JIHAD felt he could say not to his father. JIHAD stated that he was not sure if he could speak freely and go against the desires of his father, but that regardless, JIHAD was excited to go somewhere new and see the world. JIHAD was 14 years old at the time.

10. JIHAD told the agents that approximately seven months after arriving in Syria, at the age of 14 or 15, he attended ISIS military training, which focused on firing weapons such as the AK-47 assault rifle, rocket-propelled grenade launcher, and PKC machine gun. The training also involved close quarter battle and urban or open warfare. After training, JIHAD was issued an AK-47 rifle and assigned to the Anwar al-Awlaki battalion, which was comprised of English-speaking ISIS members. Service in a military battalion was required to receive an official ISIS identification, which JIHAD received while in the Anwar al-Awlaki battalion. JIHAD told FBI agents that his ISIS alias or “kunya” was Abu Dujanah al-Amriki, a/k/a Abu Dujanah al-Hindi, a/k/a “TNT” (for Trinidad and Tobago). JIHAD told the agents that his father made him attend training and that he did not initially want to attend training because he was scared to be separated from his family. JIHAD described some of the training as cool and other portions as scary.

11. Using the internet messaging application WhatsApp, JIHAD communicated frequently with his mother, who remained in Trinidad. In a WhatsApp voice recording from JIHAD to his mother on or about July 13, 2018, JIHAD stated that he and his brother, I.M.A., who was then 13 years old, conducted an attack against SDF forces on the Sham side of the Euphrates River. JIHAD was 17 years old at the time. When asked by FBI agents about the WhatsApp message, JIHAD said that he was listening to radio traffic from the attacks but was not directly participating in the fighting. JIHAD claimed that the rhetoric he used was meant to impress other fighters near him.

12. In another WhatsApp voice recording from JIHAD to his mother on or about July 13, 2018, JIHAD stated that he and his brother I.M.A. had previously been surrounded in a city and that they fought their way out. When asked by FBI agents about the WhatsApp message, JIHAD stated that the message was in reference to escaping Gharanij, Syria, when the Syrian

Democratic Forces (SDF) had ISIS surrounded. The SDF was the U.S.-allied Kurdish militia fighting against ISIS. JIHAD told the FBI agents that he walked out of Gharanij through the river, stating, “if you fought, you died.” JIHAD stated that he made the comments on the WhatsApp voice recording trying to appear cool in front of other people and described his words as bravado.

13. In a WhatsApp voice recording from JIHAD to his mother on or about September 23, 2018, JIHAD stated that he is “in a little box” and that the “kufar” are coming. Kufar is a derogatory term that ISIS members use to refer to non-believers of their radical understanding of Islam. JIHAD stated in the recording that he is “getting ready to jazz up and hopes to hit her again”. When asked by FBI agents about the WhatsApp message, JIHAD claimed that he wanted to look like a “big man” and appear in control to keep his mother calm so that she would not see him as a child anymore.

14. However, during one of the interviews with FBI agents, JIHAD admitted that he was a soldier in Dawla and fought in Shamiyah, Gharanij, and Baghuz, Syria. JIHAD stated that he believed he never had a person in his riflescope and never killed anyone. However, JIHAD admitted in his interview that he fired his AK-47 rifle on behalf of ISIS when they were attacked by ground forces and a “Syrian Regime” helicopter in Shamiyah during an ISIS operation to retrieve a suitcase with laptops and other supplies from a house. JIHAD explained that he provided cover fire against ground forces down a road outside the house, firing one or two magazines of his AK-47 rifle in small bursts. During the interview, JIHAD also admitted that he had to fight his way out of Gharanij, and fired his weapon in response to attacks from the SDF and from a local tribe fighting ISIS. According to JIHAD, the next morning, he also fired his weapon at an A-10 aircraft that was attacking ISIS fighters. JIHAD also admitted that he fired toward SDF positions in Baghuz. JIHAD was in Baghuz between January 2019, and March 17, 2019.

15. During an interview with FBI Agents, JIHAD stated that during the formation of a battalion in Gharanij, the “emir” or leader of the battalion appointed JIHAD as an “idari” (meaning manager) of supplies in the battalion because the emir trusted JIHAD would not steal supplies.

16. On or about March 17, 2019, JIHAD, EMRAAN and JIHAD’s minor brother, I.M.A., surrendered to SDF near Baghuz, Syria, and were biometrically enrolled by U.S. military service members near Tanak Oil Field, Syria. Baghuz was the last stronghold for ISIS prior to the elimination of caliphate territory and was the location of the final battles between U.S.-led coalition forces and ISIS fighters. According to a U.S. Army Major who was at the biometric enrollment site at Tanak Oil Field, Syria, where JIHAD was enrolled, only those most committed to ISIS stayed until the end at Baghuz.

17. The U.S. Department of Defense (DoD) has recovered numerous pieces of evidence that have been collected in ISIS territory in Syria. Several pieces of evidence corroborate JIHAD and EMRAAN’s participation in ISIS. For example, a handwritten (in Arabic) log book recovered in Syria and obtained by DoD forces contains the list of females who joined ISIS in Syria with dates ranging from February 20, 2015, through March 27, 2015. The log book lists Sulaymah ‘Abd-al ‘Aziz from Trinidad and Tobago. Sulaymah is described as having six children, a 47-year old husband named “Imran ‘Ali”, and a 33-year old uncle named Mus’ab Muhammad. EMRAAN was 47-years old between February and March of 2015.

18. A second handwritten notebook recovered in Syria contains biographical information of hundreds of women associated with ISIS who stayed in at least one ISIS guesthouse in Syria. This notebook, written in Arabic and translated to English, lists Salimah Abd-al-Aziz, Age 30, from Trinidad. Salimah is described as being married to Ali Umran and having six

children. The notebook shows that Salimah entered the guesthouse on May 29, 2015, and departed on June 2, 2015.

19. DoD has also obtained two hard drives that were recovered in Syria containing Excel files listing the addition of new members to a particular ISIS unit. Under a header written originally in Arabic but approximately translated to English as “Listing of the brothers added on 3-5-1438”, the name Abu Jihad al-Trinidadadi al-Amriki is listed in Arabic. Al-Amriki means “the American” and al-Trinidadadi means “the Trinidadian”. He is described as having seven children and one wife and an ISIS identifying personal number of 1200017746. The Hijri (Islamic lunar calendar) date of 3-5-1438 translates to January 31, 2017, on the Gregorian calendar. EMRAAN’s wife gave birth to twins at some point in 2016, so that on January 31, 2017, they would have had seven children but one of the twins subsequently died.

20. One of the hard drives recovered in Syria contained an Excel file with a tab title, written in originally in Arabic, which translates roughly to “reconnaissance”. The tab contains the list of 44 men, one of which is Abu Jihad al-Trinidadadi al-Amriki, personal number 1200017746, who is listed as having been issued an M4 rifle with serial number 67803. Of the 44 men listed, only Abu Jihad received an M4 rifle. “Abu Jihad” translates to “father of Jihad”.

21. During one of his interviews with FBI agents, JIHAD said that he established a Facebook account when he arrived in Syria. JIHAD stated that his profile name was “Jihad Ali”. JIHAD further stated that, while in Syria, JIHAD communicated on Facebook and WhatsApp.

22. An open source search of Facebook for profile “Jihad Ali” yielded a result for profile “Jihad.Ali.7737”, profile name “Jihad Ali”, Facebook ID **100011609831108**. The public profile timeline shows public activity from March 28, 2016, through May 31, 2016. During that



time, the Facebook account's profile picture was changed eight times. Samples of these profile pictures follow:



Jihad Ali updated his profile picture.



March 28, 2016 · 🌐



👤 2

6 Shares

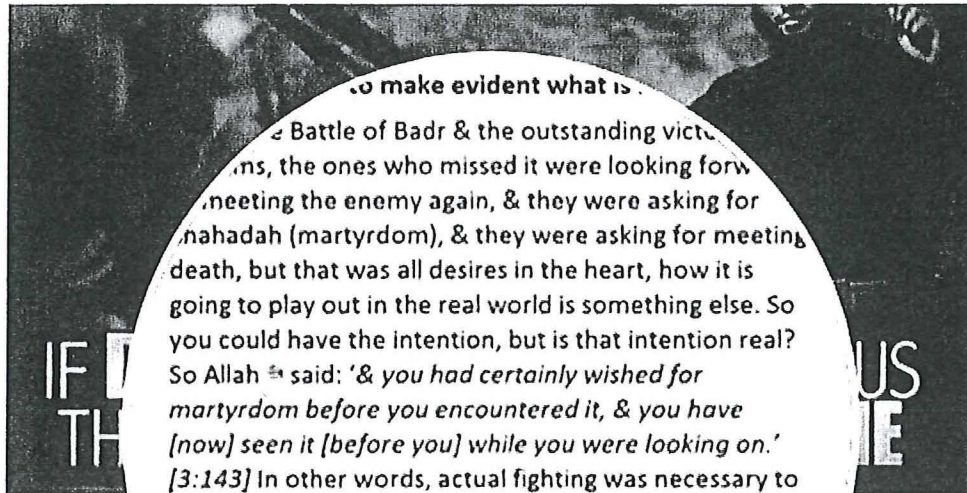
↪ Share



Jihad Ali updated his profile picture.



March 29, 2016 · 🌐



to make evident what is .

the Battle of Badr & the outstanding victo  
 ms, the ones who missed it were looking for  
 meeting the enemy again, & they were asking for  
 nahadah (martyrdom), & they were asking for meeting  
 death, but that was all desires in the heart, how it is  
 going to play out in the real world is something else. So  
 you could have the intention, but is that intention real?  
 So Allah ﷻ said: '*& you had certainly wished for  
 martyrdom before you encountered it, & you have  
 [now] seen it [before you] while you were looking on.*'  
 [3:143] In other words, actual fighting was necessary to  
 verify whether their wishes were true or not, whether  
 their intentions were true or not. & SubhanAllah,  
 maybe even they did not know about it; every one of us  
 could have intentions in our hearts, but does that mean  
 if we are faced with an opportunity to fulfil those  
 intentions we would really fulfil them? That is  
 that only Allah ﷻ knows, & that is w  
 face these situations, to m

👍 6

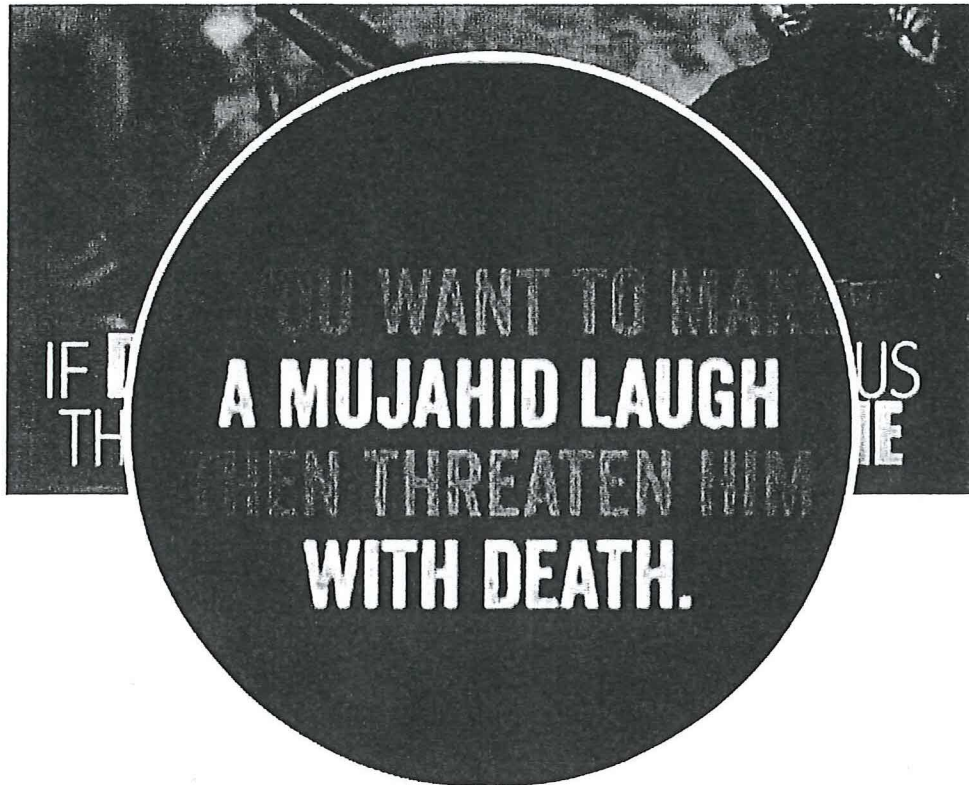
1 Share



Jihad Ali updated his profile picture.

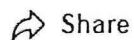


April 5, 2016 · 🌐



9

3 Comments



Share

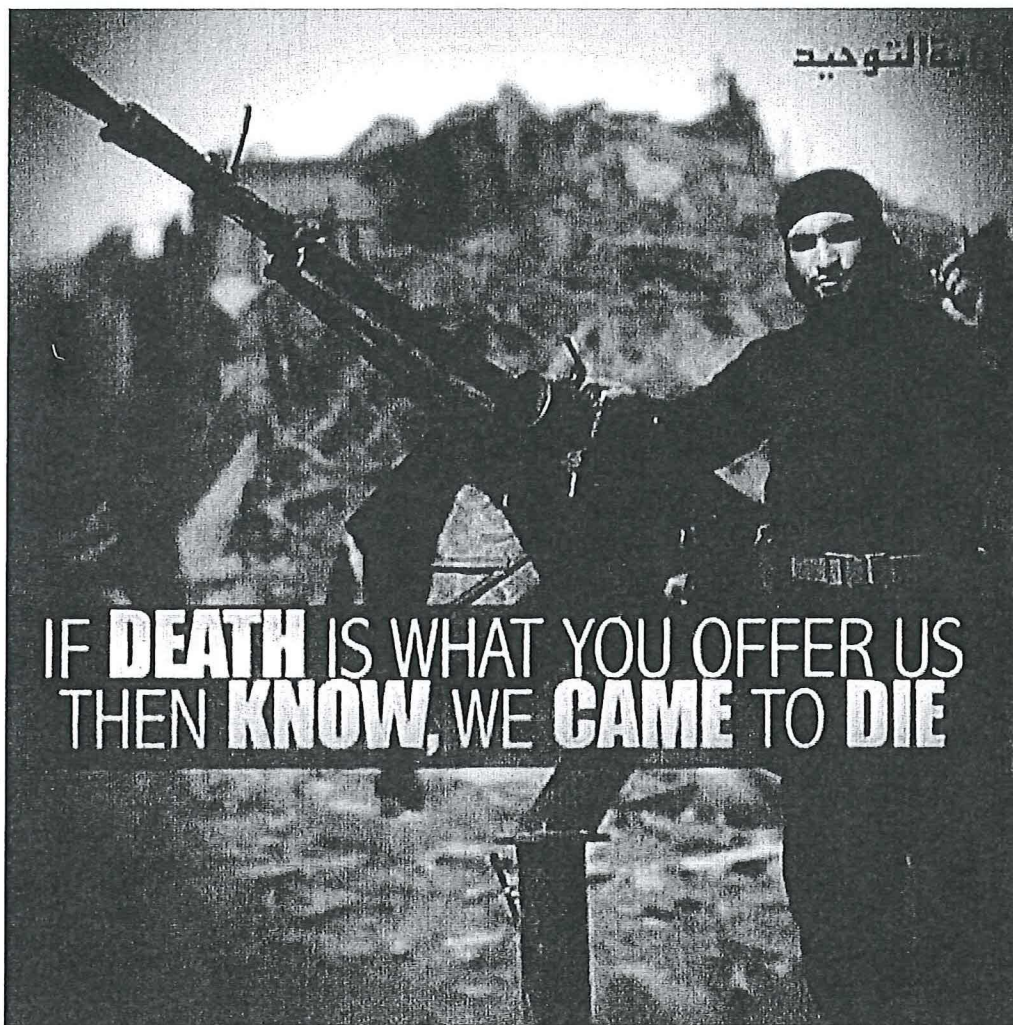
23. “Mujahid” is an Arabic term that means someone who carries out jihad. Radical Salafi Jihadi Islamist militants, including ISIS members, use the Arabic term “jihad” to refer to violent jihad (as opposed to the alternate meaning of spiritual struggle), which is the use of physical violence to bring about the downfall of governments that are perceived as opposed to a radical version of Islam and the imposition of Sharia or strict Islamic law as the exclusive basis for civil order.



Jihad Ali updated his cover photo.



April 17, 2016 · 🌐



👍 13

2 Comments 1 Share

24. An open source search of the “friends” list for Facebook ID **100011609831108** revealed that the account holder was Facebook friend of M.M., who is the aunt of JIHAD. Facebook ID **100011609831108** is also Facebook friend of A.W., a young woman who attended the Boos Settlement Mosque in Rio Claro, Trinidad, with JIHAD prior to his travel to Syria.

JIHAD used this Facebook account to communicate with several other friends and relatives in Trinidad.

25. The following are examples of the comments JIHAD posted on his Facebook account. On or about April 2, 2016, JIHAD posted “I go flight (sic) in the part of Allah to kill and be killed.” Also on or about April 2, 2016, JIHAD posted “[t]he fight will not stop until [sic] the day of judgment.” On or about April 1, 2016, JIHAD posted “I am in the islamic state.” On April 6, 2016, JIHAD posted “That’s why we kill them”, referring to non-believers.

26. Based on the foregoing facts, I respectfully submit there is probable cause to believe that JIHAD MUHAMMAD ALI, a/k/a “Abu Dujanah”, did conspire to provide material support and resources to a designated foreign terrorist organization, to wit, personnel, in violation of Title 18, United States Code, Section 371.

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**

  
SPECIAL AGENT JASON DALE COFFEY  
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn before me  
this 3 day of December, 2019.

  
HON. EDWIN G. TORRES  
UNITED STATES MAGISTRATE JUDGE

# UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America  
v.

Case No. 19-MJ-03950-TORRES

Jihad Muhammad Ali, a/k/a "Abu Dujanah,"

*Defendant*

Certified to be a true and correct copy of the document on file  
Angela E. Noble, Clerk,  
U.S. District Court  
Southern District of Florida  
By: Angela E. Noble Deputy Clerk  
Date: 12/3/19

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) Jihad Muhammad Ali, a/k/a "Abu Dujanah",  
who is accused of an offense or violation based on the following document filed with the court:

- Indictment       Superseding Indictment       Information       Superseding Information       Complaint
- Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization, in Violation of Title 18, United States Code, Section 371.

Date: Dec. 3, 2019

[Signature]  
*Issuing officer's signature*

City and state: Miami, Florida

Honorable Magistrate Judge Edwin G. Torres  
*Printed name and title*

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Arresting officer's signature*

\_\_\_\_\_  
*Printed name and title*