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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

10CR 4551 W

11	UNITED STATES OF AMERICA,	)	Case No. _____
12	Plaintiff,	)	<u>I N D I C T M E N T</u>
13	v.	)	Title 18, U.S.C., Sec. 2339A(a) -
14	NIMA ALI YUSUF,	)	Conspiracy to Provide Material
15	aka Nimco Ali Yusuf,	)	Support to Terrorists; Title 18,
16	aka Amina Ahmed,	)	U.S.C., Sec. 2339B(a)(1) -
17	aka Amina Ali,	)	Conspiracy to Provide Material
	Defendant.	)	Support to a Foreign Terrorist
		)	Organization; Title 18, U.S.C.,
		)	Sec. 1001 - False Statement to
		)	Government Agency

The grand jury charges:

Count 1

Beginning on a date unknown to the grand jury and continuing to at least on or about September 7, 2010, within the Southern District of California and elsewhere, defendant NIMA ALI YUSUF, aka Nimco Ali Yusuf, aka Amina Ahmed, aka Amina Ali, did unlawfully and knowingly conspire and agree with others, known and unknown to the grand jury, to provide material support and resources, namely personnel and money, 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, conspiracy to kill persons

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1 in a foreign country; all in violation of Title 18, United States
2 Code, Section 2339A(a).

3 Count 2

4 Beginning on a date unknown to the grand jury and continuing to
5 at least on or about September 7, 2010, within the Southern District
6 of California and elsewhere, defendant NIMA ALI YUSUF, aka Nimco Ali
7 Yusuf, aka Amina Ahmed, aka Amina Ali, a lawful permanent resident of
8 the United States, did unlawfully and knowingly conspire and agree
9 with others, known and unknown to the grand jury, to provide material
10 support and resources to al-Shabaab, which the Secretary of State has
11 designated as a foreign terrorist organization since on or about
12 February 26, 2008, to wit: to knowingly provide money to al-Shabaab
13 and personnel to work under al-Shabaab's direction and control,
14 knowing that al-Shabaab has been designated as a foreign terrorist
15 organization, and knowing that al-Shabaab has engaged, and engages,
16 in terrorist activity and terrorism; all in violation of Title 18,
17 United States Code, Section 2339B(a)(1).

18 Count 3

19 On or about September 22, 2010, within the Southern District of
20 California, defendant NIMA ALI YUSUF, aka Nimco Ali Yusuf, aka Amina
21 Ahmed, aka Amina Ali, in a matter within the jurisdiction of the
22 Federal Bureau of Investigation ("FBI"), a department and agency of
23 the United States, did knowingly and willfully make false, fictitious
24 and fraudulent statements and representations as to material facts in
25 a matter involving international terrorism, in that she did represent
26 and state to FBI Special Agent A. Aguirre and Customs and Border
27 Protection Supervisory Officer J. Haro that she had not sent any money
28 to anyone in Somalia in the preceding 12 months, whereas, in truth and

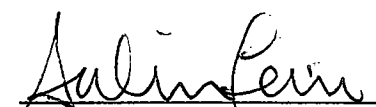
1 in fact, as defendant then and there well knew, those statements and
2 representations were false, fictitious and fraudulent when made; all
3 in violation of Title 18, United States Code, Section 1001.

4 Dated: November 12, 2010.

5 A TRUE BILL:

6 
7 _____
8 Foreperson

9 LAURA E. DUFFY
10 United States Attorney

11 By: 
12 _____
13 SABRINA L. REVE
14 Assistant U.S. Attorney
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