

SEALED

FILED

JUL 24 2014

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY

~~DEPUTY CLERK~~
SEALED

UNITED STATES OF AMERICA,

§ **CRIMINAL NO. SA-14-CR-99-XR**

Plaintiff,

§ **SUPERSEDING INFORMATION**

V.

§ **[Violations: 18 U.S.C. § 1546(a), False
Statement in Regard to Immigration**

ABDINASSIR MOHAMUD IBRAHIM,

§ **Matter - Count 1;**

Defendant.

§ **18 U.S.C. § 2339B, Conspiracy to Provide
Support to Designated Foreign Terrorist
Organization – Count 2].**

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

[18 U.S.C. § 1546(a)]

On or about October 25, 2012, in the Western District of Texas, the defendant,

ABDINASSIR MOHAMUD IBRAHIM,

did knowingly make under oath and subscribe as true under penalty of perjury a false statement with respect to a material fact in an Application for Naturalization, Form N-400, Part 10, Section D., Question 23, that is, the Defendant, when asked

“Have you **ever** given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?”

falsely stated “No,” in that the defendant knew he had falsely claimed on his August 15, 2007, Registration for Classification as Refugee, Form I-590, that he was of a member of the minority Awer clan in Somalia and subject to persecution by the majority Hawiye clan knowing full well

that he was in fact a member of the Hawiye clan and not subject to persecution, and that he had falsely claimed “No” on his April 13, 2009, Application to Register for Permanent Residence, Form I-485, regarding question 4 of Part B. “Have you ever ... through any means ever assisted or provided any type of material support to, any person or organization that has ever engaged or conspired to engage, in sabotage, kidnapping, political assassination, hijacking, or any other form of terrorist activity?” knowing full well he had knowingly provided material support in the form of cash to an al-Shabaab member at the al-Shabaab member’s request.

In violation of Title 18, United States Code, Section 1546(a).

COUNT 2
[18 U.S.C. § 2339B(a)(1)]

From on or about May 18, 2010, to on or about January 31, 2014, the defendant,

ABDINASSIR MOHAMUD IBRAHIM,

whose last known residence was in the Western District of Texas and who being first arrested in the Western District of Texas, did knowingly combine, conspire, confederate, and agree with others known and unknown to the grand jury, to provide material support and resources, a cash payment to a known member of al-Shabaab for the benefit of al-Shabaab, knowing that al-Shabaab, which was designated by the United States Secretary of State as a foreign terrorist organization on or about February 26, 2008, pursuant to Section 219 of the Immigration and Nationality Act, and is currently designated as such as of the date of this Information, engaged and engages in terrorism or terrorist activity.

In violation of Title 18, United States Code, Section 2339B(a)(1).

ROBERT PITMAN
United States Attorney

By:



MARK T. ROOMBERG
Assistant United States Attorney