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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

February 2009 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,

v.

JEHAD SERWAN MOSTAFA,
aka "Ahmed"
aka "Emir Anwar"
aka "Anwar"

Defendant.

Case No. '09 CR 3726 WQH

I N D I C T M E N T

Title 18, U.S.C., Sec. 2339A(a) -
Conspiracy to Provide Material
Support to Terrorists; Title 18,
U.S.C., Sec. 2339B(a)(1) -
Conspiracy to Provide Material
Support to a Foreign Terrorist
Organization; Title 18, U.S.C.,
Sec. 2339B(a)(1) - Providing
Material Support to a Foreign
Terrorist Organization

The grand jury charges:

Count 1

Beginning on a date unknown to the grand jury and continuing to at least in and about June 2009, defendant JEHAD SERWAN MOSTAFA, aka "Ahmed," aka "Emir Anwar," aka "Anwar," a national of the United States with a last known residence within the Southern District of California, did unlawfully and knowingly conspire and agree with others, known and unknown to the grand jury, to provide material support and resources, namely, personnel including himself, 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 2332a(b), conspiracy to use a weapon of mass destruction outside of the United States; all in violation of Title 18, United States Code, Section 2339A(a).

Count 2

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2 Beginning on or about March 18, 2008, and continuing to at least
3 in and about June 2009, defendant JEHAD SERWAN MOSTAFA, aka "Ahmed,"
4 aka "Emir Anwar," aka "Anwar," a national of the United States with
5 a last known residence within the Southern District of California, did
6 unlawfully and knowingly conspire and agree with others, known and
7 unknown to the grand jury, to provide material support and resources
8 to al-Shabaab, which has been designated by the Secretary of State as
9 a foreign terrorist organization since on or about February 26, 2008,
10 to wit: to knowingly provide personnel including himself to work under
11 al-Shabaab's direction and control, and to organize, manage,
12 supervise, and otherwise direct the operation of al-Shabaab, knowing
13 that al-Shabaab has been designated as a foreign terrorist
14 organization, and knowing that al-Shabaab has engaged, and engages,
15 in terrorist activity and terrorism; all in violation of Title 18,
16 United States Code, Section 2339B(a)(1).

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Count 3

From on or about March 18, 2008, and through in and about June 2009, defendant JEHAD SERWAN MOSTAFA, aka "Ahmed," aka "Emir Anwar," aka "Anwar," a national of the United States with a last known residence within the Southern District of California, did unlawfully and knowingly provide material support and resources to al-Shabaab, which has been designated by the Secretary of State as a foreign terrorist organization since on or about February 26, 2008, to wit: knowingly providing personnel including himself to work under al-Shabaab's direction and control, and to organize, manage, supervise, and otherwise direct the operation of al-Shabaab, knowing that al-Shabaab has been designated as a foreign terrorist organization, and knowing that al-Shabaab has engaged and engages in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B(a)(1).

DATED: October 9, 2009.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By: _____
WILLIAM P. COLE
Assistant U.S. Attorney