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IN OPEN COURT

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CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

ν.

No. 1:21-cr-271

MOHAMMED KHALIFA,

a/k/a,

Abu Ridwan Al-Kanadi Abu Muthanna Al-Muhajir

Defendant.

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about August 2013, and continuing thereafter through January 2019, in an offense committed outside of the jurisdiction of any particular State or district of the United States, the defendant MOHAMMED KHALIFA, a/k/a Abu Ridwan Al-Kanadi and Abu Muthanna Al-Muhajir, who was first brought to and found in the Eastern District of Virginia, and others known and unknown to the Grand Jury, did conspire to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), namely, personnel (including himself) and services, to a foreign terrorist organization — namely, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act — knowing that ISIS was a designated foreign terrorist organization, that ISIS engages in or has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism. Deaths resulted from the commission of this offense.

As part of the conspiracy to provide material support and resources to ISIS, as alleged above, KHALIFA took the following actions, among others:

- KHALIFA provided the English narration on Flames of War: Fighting Has Just Begun, an ISIS propaganda video distributed by its al-Hayat Media Center on September 19, 2014.
- 2. KHALIFA murdered a Syrian solider at the conclusion of the *Flames of War: Fighting Has Just Begun* propaganda video.
- 3. KHALIFA provided the English narration on *Flames of War II: Until the Final Hour*, an ISIS propaganda video distributed by its al-Hayat Media Center on November 29, 2017.
- 4. KHALIFA murdered a Syrian solider at the conclusion of the *Flames of War II: Until the Final Hour* propaganda video.

(All in violation of Title 18, United States Code, Section 2339B).

Jessica D. Aber

United States Attorney

By:

Dennis M. Fitzpatrick

Raj Parekh John T. Gibbs

Aidan Taft Grano-Mickelson Assistant United States Attorneys Eastern District of Virginia Alicia H. Cook, Trial Attorney

U.S. Department of Justice