

UNITED STATES DISTRICT COURT

for the

United States of America

v.

JAELYN DELSHAUN YOUNG and
MUHAMMAD ODA DAKHLALLA

Case No. **3:15MJ32-SAA**

Defendant(s)

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 5/21/2015 to present in the county of Oktibbeha in the
Northern District of Mississippi, the defendant(s) violated:

Code Section

18 USC 2339(B)

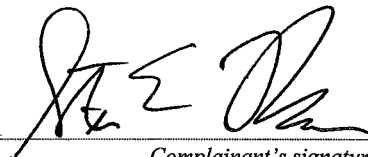
Offense Description

Attempting and conspiring to knowingly provide material support and resources to a foreign terrorist organization ("ISIL") in the form of personnel, knowing that said organization is a designated terrorist organization that has engaged in and is engaging in terrorist activity as defined in Section 140(d) (2) of the Foreign Relations Authorization Act.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

S/A Stephen E. Thomason

Printed name and title

Sworn to before me and signed in my presence.

Date:

August 18, 2015



Judge's signature

City and state:

Oxford, Mississippi

S. ALLAN ALEXANDER

Printed name and title

UNITED STATES DISTRICT COURT

for the

Northern District of Mississippi

United States of America

v.

JAELYN DELSHAUN YOUNG

MUHAMMAD ODA DAKHLALLA

Defendant

Case No. **3:15MJ32-SAA**

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) Jaelyn Delshaun Young and Muhammad Oda Dakhlalla,

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:

Attempting and conspiring to knowingly provide material support and resources to a foreign terrorist organization ("ISIL") in the form of personnel, knowing that said organization is a designated terrorist organization that has engaged in and is engaging in terrorist activity as defined in Section 140(d)(2) of the Foreign Relations Authorization Act.

Date:

August 18, 2015



Issuing officer's signature

U.S. MAGISTRATE JUDGE

S. ALLAN ALEXANDER

Printed name and title

City and state: Oxford, Mississippi

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

**IN RE: UNITED STATES' CRIMINAL
COMPLAINT AND APPLICATION FOR
AN ARREST WARRANT FOR
JAELYN DELSHAUN YOUNG and
MUHAMMAD ODA DAKHLALLA**

UNDER SEAL

No. 3:15MJ 32-SAA

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Special Agent Stephen E. Thomason, first being duly sworn, deposes and states:

INTRODUCTION

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging JAELYN DELSHAUN YOUNG and MUHAMMAD ODA DAKHLALLA, with violating 18 U.S.C. § 2339B, in that they did knowingly and willfully conspire and attempt to provide material support or resources to a Foreign Terrorist Organization, that is the Islamic State of Iraq and the Levant ("ISIL").
2. I am a Special Agent with the Federal Bureau of Investigation, and I have worked in that capacity for 18 years. I am currently assigned to the FBI's Jackson Field Division, Oxford Resident Agency. I am currently assigned to an FBI Counterterrorism squad, which includes the Mississippi Joint Terrorism Task Force (JTTF). As such, I am charged with enforcing federal law. My primary duty and assignment obligates me to investigate federal crimes. The information contained in this affidavit is based on my personal knowledge, my training and experience, and information supplied to me by other law enforcement officers. This affidavit is intended to show merely that there is sufficient probable cause to support the criminal complaint and does not purport to set forth all the knowledge of or investigation into this matter.
3. A person violates 18 U.S.C. § 2339B when he or she

Knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization or that the organization has engaged or engages in terrorist activity.

Section 2339B(g)(4) defines "material support or resources," as used in Section 2339B:

[T]he term “material support or resources,” means any property, tangible or intangible, or service, including currency or monetary instruments of financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.

4. On October 15, 2004, the United States Secretary of State designated AQI, then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.
5. On May 15, 2014, the Secretary of State amended the designation of AQI 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 ISIL listing: the Islamic State of Iraq and al’Sham (“ISIL”), the Islamic State of Iraq and Syria (“ISIS”), ad-Dawla al’Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. Although the group has never called itself “Al-Qaeda in Iraq (AQI),” this name has frequently been used to describe it through its history. To date, ISIL remains a designated FTO. In an audio recording publicly released on June 29, 2014, ISIS announced a formal change of ISIL’s name to Islamic State (“IS”).

Background of the Investigation and Statement of Probable Cause

6. The investigation has revealed that YOUNG and DAKHLALLA are supporters of ISIL and wish to travel to Syria to join ISIL.
7. On or about May 13, 2015, FBI Employee 1 had online contact with an individual who expressed a desire to travel to Syria in support of ISIL and made several supportive statements of ISIL.
8. On or about May 21, 2015, YOUNG was identified by FBI Employee 1 through social media platforms as a supporter of ISIL. YOUNG is a 19-year-old female United States citizen who currently resides in Starkville, Mississippi.
9. On or about May 25, 2015, YOUNG’s Twitter page contained the following messages:
“@1_Modest_Woman \$\$\$ for plane tickets”

“The only thing keeping me away is \$\$\$ but working all of this overtime will be worth when I am finally there. #baqiya¹”

¹ Baqiya is an Islamic term with a literal meaning of “remains”, likely referring to the ISIL slogan “baqiya wa tatamaddad” which translates as “remaining and expanding.”

"I just want to be there :(#IS."

10. YOUNG engaged FBI Employee 1 on various internet and social media platforms. Investigation confirms that all of these platforms are registered to YOUNG. During one such online interaction, on May 29, 2015, YOUNG made it clear that, in relation to the Muslim family with whom she spends a great deal of time, and her local community as a whole, "many of the family members and members of the community do not support Dawlah . . ."² YOUNG expressed that she disagreed with those family and community members and stated ". . . Dawlah is correct."
11. In that same conversation, YOUNG announced that she is preparing for "hijrah," a common reference to journeying to the Islamic State. She further stated, "I have [a] hijrah partner and we are planning to leave before August." She went on to discuss some of her concerns about being monitored by Government agencies, and she also added that her travel partner was a "brother" and that she would have to have "nikkah"³ with him so they could travel together without an escort.
12. Investigation has revealed that YOUNG's hijrah partner is DAKHLALLA. DAKHLALLA is a 22-year-old man. He is a United States citizen currently living in Starkville, Mississippi.
13. In this same conversation with FBI Employee 1, YOUNG announced "Alhamdulillah"⁴ we found jobs . . . and have been saving up. We have enough for tickets and other expenses but now we are just waiting on my passport which of course takes forever all of a sudden." YOUNG informed FBI Employee 1 that she and DAKHLALLA would initially travel to Turkey, and then from Turkey they would enter Syria. She stated ". . . In sha Allah"⁵ the planning will land us in Dawlah with the grace of Allah swt."⁶
14. On or about June 1, 2015, after being introduced to FBI Employee 2 (as a purported ISIL facilitator) by FBI Employee 1, YOUNG reached out to FBI Employee 2 over social media stating "I need help crossing from Turkey to Syria with my hijrah partner. We will leave before August Ukhti"⁷ and we don't know Turkey at all very well (I haven't even travelled outside U.S. before)." YOUNG expressed a readiness to swear allegiance and join ISIL, stating "Alhamdulillah Ukhti, and yes Ukhti we are. We know

² Dawlah is a reference to "ad-Dawlah al-Islamiyah," which translates to Islamic State. The term Dawlah is ISIL's preferred name for itself.

³ A nikkah is an Islamic marriage.

⁴ Alhamdulillah translates in Arabic to "God be praised."

⁵ "God willing."

⁶ "Swt" likely refers to "Subhanahu wa talala," an Arabic phrase meaning "may He be glorified and exalted."

⁷ Ukhti translates in Arabic to "my sister."

this is the true Khalifa⁸.” YOUNG then discussed what skills she and DAKHLALLA possessed that would be useful, stating “I am skilled in math and chemistry and worked at an analytical lab here at my college campus. My partner is very good with like computer science/media. We learn very fast and would love to help with giving medical aid to the injury In sha Allah.”

15. On or about June 3, 2015 FBI Employee 1 made contact with DAKHLALLA via social media. Investigation has confirmed that the user name used by DAKHLALLA is registered in his name. FBI Employee 1 and DAKHLALLA discussed hijrah, and then DAKHLALLA told FBI Employee 1 “I am good with computers, education and media. What could I contribute to Dawlah? In sha Allah.” He went on to state, “Aaminah (YOUNG) and I have our nikkah approved by my father. In sha Allah we will be married before we reach Dawlah. Alhamdulillah . . . would we be appointed to a city or would we choose to go where we want to live when we arrive?”
16. On or about June 2, 2015, YOUNG discussed with FBI Employee 2 what DAKHLALLA would do once they arrived in Syria, specifically would he be “media or Mujahideen.” YOUNG stated “He wants to help with media group and really wants to correct the falsehoods heard here. US has a thick cloud of falsehood and very little truth about Dawlah makes it through and if it does then usually the links are deleted (like on youtube and stuff). DAKHLALLA says a lot of Muslims are caught on their doubts of IS bc of what US media says and he wants to assure them the US media is all lies when regarding Dawlah. After he sees change in that, he wanted to join the Mujahideen Ukhti.”
17. In the same conversation, YOUNG also discussed her nikkah to DAKHLALLA. She confirmed that they had DAKHLALLA’s father’s blessing, and she stated, “our nikkah will be this Saturday (June 6, 2015) and In sha Allah we will be in Dawlah before end of July. Our story will be that we are newlyweds on our honeymoon.” Young also stated that “We won’t be flying to Istanbul. We will fly to a different country and take a bus to Istanbul.” In order to avoid suspicion YOUNG stated that they would fly to Greece first as that would further support their cover story. On or about June 17, 2015, YOUNG confirmed that the wedding took place on June 6, 2015.
18. On or about June 9, 2015, YOUNG discussed some of her travel concerns with FBI Employee 2. FBI Employee 2 reassured YOUNG, and YOUNG replied, “Okay, I trust you Ukhti :) He (DAKHLALLA) just really wants to make it to Dawlah to rectify the falsehoods here. I cannot wait to get to Dawlah so I can be amongst my brothers and sisters under the protection of Allah swt and to raise little Dawlah cubs In sha Allah.”

⁸ This appears to reference the caliphate, a form of Islamic government led by a caliph (or khalifa), a person considered a political and religious successor to the prophet Mohammad and a leader of the entire Muslim community. ISIL claims to practice this type of government.

19. Between on or about June 9, 2015, and June 11, 2015, DAKHLALLA and FBI Employee 1 communicated several times over social media. FBI Employee 1 congratulated DAKHLALLA on his marriage to YOUNG. On June 10, 2015, after confirming his marriage, DAKHLALLA asked "Ya Akhi,⁹ could you tell me of what I would have to do once I make it to Dawlah? In sha Allah I will go through training and Shariah¹⁰ first? I am not familiar with Shariah but from what Aaminah (YOUNG) and I researched, Dawlah follows Shariah correctly, right Akhi?" FBI Employee 1 confirmed DAKHLALLA's statement that all aspects of life in Dawlah follow sharia and are to be strictly followed by everyone.
20. On or about June 13, 2015, YOUNG informed FBI Employee 2 that she and DAKHLALLA were going to pay to expedite the issuance of their passports.
21. On or about June 21, 2015, DAKHLALLA stated to FBI Employee 1, "Assalamu alaikum Akhi and Jzk¹¹, Aaminah (YOUNG) has heard from the sister (FBI Employee 2) but we can't make any further movements until our passports come in. We got them expedited but until then we are stuck in a rut. In sha Allah we will make it to Dawlah before eid¹² and if not then we will make sure to spend it with our families . . . since it will be our last with them. Allahu a'lam but please make dua¹³ for us that things will start to happen quickly."
22. The investigation has revealed via bank records that DAKHLALLA made a \$340 electronic transfer payment which posted to his bank account on or about July 1, 2015, for the purpose of expediting two passport applications. The investigation has also revealed that YOUNG and DAKHLALLA applied for passports on or about June 26, 2015, and paid to have those applications expedited.
23. On or about June 25, 2015, YOUNG contacted FBI Employee 2 over social media to complain about the amount of time that it was taking to get their passports, and the hope that they would arrive by July 13. On or about June 26, 2015, YOUNG said, in response to FBI Employee 2 expressing a wish to celebrate eid together, that "Wa alaikum salaam Ukhti. Even if our passports make it just 2 or 3 days before eid, In sha Allah my husband and I will rush to Dawlah to make it. But as for the planning, Ukhti, will we meet you as soon as we reach Istanbul or 1 or 2 days after? This way I can arrange a stay. We will try to spend as little time in Greece as possible."

⁹ Akhi translates to "brother" in Arabic.

¹⁰ Sharia law is the Islamic legal system derived from the religious precepts of Islam.

¹¹ Jzk is shorthand for Jazik Allah Khayr, an Arabic term used as an expression of gratitude.

¹² Referencing Eid al-Fitr, a feast day/holiday marking the end of Ramadan.

¹³ Prayer.

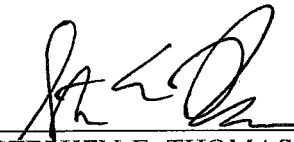
24. On or about July 1, 2015, YOUNG asked, "when we make it to Istanbul, do we absolutely have to buy a sim card or can we contact you via a laptop?"
25. On or about July 8, 2015, in an online interaction with FBI Employee 2, YOUNG announced that "our passports should be in by next weekend. We will just fly to Istanbul now since we just want to get to Dawlah . . . our hearts ache :(but we have little expenses remaining so can't stay in Istanbul long Ukhti."
26. On or about July 12, 2015, DAKHLALLA contacted FBI Employee 1 and stated, "Salaam again. I wanted to ask about the military experience there. Would I be with people that speak English as well or do they put me with everyone at basic training? I am excited about coming to Dawlah, but I feel I won't know what all I will be doing."
27. On or about July 13, 2015, DAKHLALLA informed FBI employee 1 "I wish to be a mujahid akhi. I am willing to fight. I want to be taught what it really means to have that heart in battle!"
28. On or about July 16, 2015, YOUNG stated, "Wa alaikum salaam Ukhti, we are extremely furious :(and sad. They said our passports still pending even though they said it should be sent by this week. So we went to our city clerk and she said NPIC will put passports for smaller cities last and take care of one coming from larger cities first, then she turned and look to my husband kind of mean and said that she also suspects they also might be taking longer because of the type of name he has. He has an Arabic name. I am so angry because now Eid is Friday in Dawlah and we are missing it :("
29. On or about July 17, 2015, YOUNG stated, "What makes me feel better after just watching the news is that an akhi carried out an attack against US marines in TN! Alhamdulillah, the numbers of supporters are growing. *better"
30. On or about July 26 and 27, 2015, YOUNG asked FBI Employee 2 "Assalamu alaikum Ukhti, the things going on in Turkey are reaching here. Are the borders still 'open'?" YOUNG then added "[w]e have been hearing about Turkey's actions as well and In sha Allah, Dawlah will begin to expand into Europe soon."
31. In that same series of communications with FBI Employee 2 on July 26 and 27, 2015, YOUNG stated "No Ukhti :(I read that some passports take up to 11 weeks! We just do not have that kind of time! College starts in about 3 weeks and it will be harder to disappear without getting caught while on the flight to Turkey. Ya Ukhti, if I had the knowledge that I had about Dawlah when I reverted earlier this year we would have already been together in Dawlah." YOUNG went on to say "UKHTI!! WE HAVE OUR PASSPORTS! WE CALLED AND THEY WERE SENT OUT 4 DAYS AGO! THEY MADE IT TO OUR MAILBOX AND WE WILL SOON CHOOSE OUR FLIGHTS!! ALHAMDULILLAH AND JZK FOR YOUR DUA!!!" She also stated "My husband has his and mine should be here by this weekend." YOUNG further stated "We are sooooo happy!!" YOUNG went on to say "We will apply for Turkish Visa!!!!"

32. On or about July 29 and 30, 2015, in conversations YOUNG stated, "Alhamdulillah Ukhti, and we have saved some expenss. In sha Allah it will be enough, will we need to pay for a taxi or train? You don't need to tell me specifics but we just want to calculate to make sure we have enough." YOUNG went on to say, "You will leave IS to come get us in Istanbul?"
33. On or about July 30, 2015, DAKHLALLAH stated to FBI Employee 1 "Asalaamu alaikum ya akhi, we received our passports just recently. We will be making flight arrangements soon inshallah!" DAKHLALLAH went on to say "Also sorry for replying so late but we have been planning and stressing and praying."
34. On or about July 31, 2015, YOUNG stated, "Jzk Ukhti we have applied for our visas and will have them soon and then we should be in Istanbul by next weekend. Ukhti, could you make sure the brother has a veil ready for me to wear? I feel ashamed to not wear one but I wouldn't be able to leave as easily if at all."
35. On or about August 3, 2015, DAKHLALLA stated "Salaamu alaikum again brother, my wife is getting worried about what if an IS member tests us to see if we are Sunni. We want to know if there are questions they may ask that would be difficult. Some people called this 'the abu Wahib test'. Wallahi we are sunnis, but we don't want to be mistaken because of some test. Please let me know if you have anything on this matter."
36. On or about August 1 and 3, 2015, YOUNG stated "JZK Ukhti and we have our visas now :) We will finish packing and buy our plane tickets. I am so excited but my husband is still nervous about getting only to realize that we will be arrested by the Turkish police or something. I tell him not to worry." YOUNG also stated "because I don't think they would put so much effort to arrest us in Turkey when they could just give Intel to US to arrest us before leaving" Also she stated "but he will be a bit worried until he gets there and see all is fine. Other than that, he and I keep talking about Dawlah. Alhamdulillah, soon we will taste the freedom of Khalifah" YOUNG later stated "Assalamu alaikum Ukhti, we are curious. In Dawlah will there be Quaranic, Shariah and Aqeedah classes in English?" YOUNG added "Also we will arrive in Istanbul @ noon In sha Allah."
37. On or about August 4, 2015, DAKHLALLAH said "Wa alaykum salaam and Jzk Akhi for your dua. She worries so much but not because she doesn't trust Allah, she does, but because she is so anxious to see her sisters and perfect her deen. Wallahi, I can tell that she loves her sisters that she has not yet me but she loves them because they are in Dawlah and they love Allah swt and I know that as soon as we reach Turkey In sha Allah, she will be relieved and that when we reach Dawlah she may nearly pass out from happiness. We make dua every night and In sha Allah we will see you soon Akhi."
38. On or about August 4, 2015, YOUNG stated, "We will be flying direct. We live in a small town with a very small (poo) airport that doesn't have much, if an, security. In fact when we get to Dawlah In sha Allah I can tell you about it. That's one US

weaknesses – small towns' airports have poor funding and less educated staff so it is easier to get through."

"Alhamdulillah Ukhti, about the classes. I was sure there were classes/etc in English and I can not wait to learn and improve my Arabic :)."

39. Also on or about August 4, 2015, YOUNG stated, "We will leave from US on Saturday and arrive in Turkey on Sunday. As far as clothing, we don't have anything out of the ordinary but I think I will stand out pretty well, especially my hair (big bushy curly hair) but we will choose outfits with logos or such so that we may be recognized."
40. On or about August 5, 2015, YOUNG stated "Wa alaikum salaam. Yes Ukhti, we should be in Istanbul around 11 am and through customs around noon or 1 In sha Allah" YOUNG went on to say "Ukhti -_-the kuffs are reporting that IS has a sex slave trade business for girls as young as 1-9 years old... these ppl believe it too. I can not wait to be in Dawlah. These likes are so toxic, I am getting very angry at them for believing such stupidity."
41. On or about July 26, 2015, DAKHLALLA received his passport. On or about July 30, 2015, YOUNG received her passport. On or about August 7, 2015, they purchased airline tickets for Delta Airlines Flight # 5073 flying from Columbus, Mississippi, with U. S. connections to Amsterdam, the Netherlands, to arrive at their final ticketed destination of Istanbul, Turkey.
42. On or about August 8, 2015, YOUNG and DAKHLALLA traveled to the Golden Triangle Regional Airport in Columbus, Mississippi, in order to travel to an area controlled by ISIL in order to provide material support or resources to ISIL.
43. YOUNG and DAKHLALLA were both interviewed on August 8, 2015 and confessed to attempting to travel to Turkey to join ISIL.
44. Based on the foregoing I submit there is probable cause to believe that JAELYN DELSHAUN YOUNG and MUHAMMAD ODA DAKHLALLA, in the Northern District of Mississippi, have attempted and conspired to knowingly provide material support or resources to a designated foreign terrorist organization, to wit: ISIL, thereby committing a violation of Title 18, United States Code, Section 2339B, and I request that an arrest warrant be issued as specified in the criminal complaint.
45. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.


STEPHEN E. THOMASON
Special Agent
Federal Bureau of Investigation