

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.

NOV 03 2010

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UNITED STATES OF AMERICA)	
)	NO. 3:10-00260
v.)	Judge Haynes
)	
[1] ABDIFITAH JAMA ADAN)	18 U.S.C. § 2
a/k/a "SHORTY")	18 U.S.C. § 371
a/k/a "FALEEBO")	18 U.S.C. § 982(a)(2)
a/k/a "KUZZO")	18 U.S.C. § 1001
)	18 U.S.C. § 1028(f)
[2] ABDULLAHI SADE AFYARE)	18 U.S.C. § 1029(b)(2)
a/k/a "FOREHEAD")	18 U.S.C. § 1029(c)(1)(C)
)	18 U.S.C. § 1425(a)
[3] AHMAD ABNULNASIR AHMAD)	18 U.S.C. § 1512(c)(2)
a/k/a "FABULOUS")	18 U.S.C. § 1512(k)
)	18 U.S.C. § 1591(a)(1)
[4] YAHYA JAMAL AHMED)	18 U.S.C. § 1591(a)(2)
)	18 U.S.C. § 1591(d)
[5] ABDIKARIM OSMAN ALI)	18 U.S.C. § 1594(c)
a/k/a "HOMER")	18 U.S.C. § 1623(a)
a/k/a "BIG ABDI")	
)	
[6] MUSSE AHMED ALI)	
a/k/a "FAT BOY")	
)	
[7] HASSAN AHMED DAHIR)	
a/k/a "MOHAMED ALI HUSSEIN")	
)	
[8] FADUMO MOHAMED FARAH)	
a/k/a "NAANA NAANA")	
a/k/a "GANGSTER BOO")	
a/k/a "BARNIE")	
)	
[9] IDRIS IBRAHIM FAHRA)	
a/k/a "CHI TOWN")	
)	
[10] YASIN AHMED FARAH)	
)	
[11] ABDULLAHI HASHI)	
a/k/a "KAMAL")	

[12]	FATAH HAJI HASHI)
	a/k/a "JERRY")
	a/k/a "JR")
)
[13]	ABDIRAHMAN ABDIRAZAK HERSI)
	a/k/a "BIGGIE")
)
[14]	MUHIYADIN HASSAN HUSSEIN)
	a/k/a "CD")
)
[15]	DAHIR NOR IBRAHIM)
	a/k/a "DAHIR LUCKY")
)
[16]	ABDIFATAH BASHIR JAMA)
	a/k/a "CASH MONEY")
	a/k/a "OHIO")
)
[17]	ANDREW KAYACHITH)
	a/k/a "AK")
)
[18]	ABDIGADIR AHMED KHALIF)
	a/k/a "AWALI")
)
[19]	BASHIR YASIN MOHAMUD)
	a/k/a "BR")
)
[20]	MUSTAFA AHMED MOHAMED)
)
[21]	FUAD FAISAL NUR)
	a/k/a "HANJULE")
)
[22]	ABDIFATAH SHARIF OMAR)
	a/k/a "BRITISH")
	a/k/a "PINKY")
)
[23]	LIBAN SHARIF OMAR)
	a/k/a "SUNDERRA")
)
[24]	MOHAMED SHARIF OMAR)
	a/k/a "MOE D")
	a/k/a "MOJO")

[25] HAMDİ ALİ OSMAN)
a/k/a "BIG HAMDİ")
a/k/a "BOSS LADY")
)
[26] HAJİ OSMAN SALAD)
a/k/a "HOLLYWOOD")
)
[27] BIBİ AHMED SAİD)
)
[28] AHMED AWEYS SHEİK)
a/k/a "REAR HAMMER")
a/k/a "ABDUL")
)
[29] YASSİN ABDİRAHMAN YUSUF)
a/k/a "JUNIOR")
a/k/a "BLACK CAT JUNIOR")
)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

INTRODUCTION

1. The Venture

a. The Somali Outlaws, commonly referred to as the "SOL" is a gang based in Minneapolis, Minnesota.

b. The Somali Mafia, commonly referred to as the "SM" is a gang based in Minneapolis, Minnesota.

c. The Lady Outlaws, commonly referred to as the "LOL" is a gang based in Minneapolis, Minnesota and is also part of SOL/SM.

d. The SOL, SM, and LOL, are connected. Each group is comprised of Somali individuals. The distinction between the SOL and SM is generally age. The Lady Outlaws is comprised mainly of Somali females. The SOL, SM, and LOL operate in conjunction with each other. Each of these gangs has individuals who associate with the gang but who are not members of the gang.

e. The SOL, SM, LOL, and associates thereof constitute a group of two or more individuals associated in fact, whether or not a legal entity. This association is a venture as defined in Title 18, United States Code, Section 1591(e)(5). One of the intentions of the SOL, SM, and LOL is to identify, recruit and obtain females who are under the age of 14 years and under the age of 18 years, to participate in commercial sex acts in exchange for money and other items, as defined by Title 18, United States Code, Section 1591(e)(3). The SOL, SM, and LOL use various methods to obtain these females and cause them to perform commercial sex acts, including abuse, threats, force, and coercion as defined by Title 18, United States Code, Section 1591(e)(2). The venture operated in Nashville, Tennessee; Saint Paul, Minnesota; Minneapolis, Minnesota; Columbus, Ohio; and other locations.

f. At various times relevant to this Indictment, the following individuals were members of SOL, SM, and LOL or associates:

- [1] ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO", was an associate of members of the SOL/SM.
- [2] ABDULLAHI SADE AFYARE a/k/a "FOREHEAD", was a member of the SOL/SM.
- [3] AHMAD ABNULNASIR AHMAD a/k/a "FABULOUS", was a member of the SOL/SM.

- [4] YAHYA JAMAL AHMED, was a member of the SOL/SM.
- [5] ABDIKARIM OSMAN ALI, a/k/a "HOMER" a/k/a "BIG ABDI", was a member of the SOL/SM.
- [6] MUSSE AHMED ALI a/k/a "FAT BOY", was an associate of members of the SOL/SM.
- [7] HASSAN AHMED DAHIR a/k/a "MOHAMED ALI HUSSEIN", was a member of the SOL/SM.
- [8] FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE" was an associate of members of the SOL/SM.
- [9] IDRIS IBRAHIM FAHRA a/k/a "CHI TOWN", was a member of the SOL/SM.
- [10] YASIN AHMED FARAH was an associate of members of the SOL/SM.
- [11] ABDULLAHI HASHI a/k/a "KAMAL", was a member of the SOL/SM.
- [12] FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR", was a member of the SOL/SM.
- [13] ABDIRAHMAN ABDIRAZAK HERSEI a/k/a "BIGGIE", was a member of the SOL/SM.
- [14] MUHIYADIN HASSAN HUSSEIN a/k/a "CD", was an associate of members of the SOL/SM.
- [15] DAHIR NOR IBRAHIM a/k/a "DAHIR LUCKY", was an associate of members of the SOL/SM.
- [16] ABDIFATAH BASHIR JAMA a/k/a "CASH MONEY" a/k/a "OHIO", was an associate of members of the SOL/SM.
- [17] ANDREW KAYACHITH a/k/a "AK", was an associate of members of the SOL/SM.
- [18] ABDIGADIR AHMED KHALIF a/k/a "AWALI", was an associate of members of the SOL/SM.

- [19] BASHIR YASIN MOHAMUD a/k/a "BR", was a member of the SOL/SM.
- [20] MUSTAFA AHMED MOHAMED, was an associate of members of the SOL/SM.
- [21] FUAD FAISAL NUR a/k/a "HANJULE", was a member of the SOL/SM.
- [22] ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY", was an associate of members of the SOL/SM/LOL and is the brother to defendants 23 and 24.
- [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", was an associate of members of the SOL/SM/LOL and is the brother to defendants 22 and 24.
- [24] MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO", was an associate of members of the SOL/SM/LOL and is the brother to defendants 22 and 23.
- [25] HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY", was a member of the LOL and a gang called the Lady Bravehearts.
- [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD", was a member of the SOL/SM.
- [27] BIBI AHMED SAID, was an associate of members of the SOL/SM/LOL.
- [29] YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR", was a member of the SOL/SM.

THE CONSPIRACY

2. From in or about January 2000, through in or about July 2010, the exact dates being unknown to the Grand Jury, in the Middle District of Tennessee and elsewhere, [1] **ABDIFITAH JAMA ADAN** a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO", [2] **ABDULLAHI SADE AFYARE** a/k/a "FOREHEAD", [3] **AHMAD ABNULNASIR AHMAD** a/k/a

“FABULOUS”, [5] ABDIKARIM OSMAN ALI, a/k/a "HOMER" a/k/a "BIG ABDI", [6] MUSSE AHMED ALI a/k/a "FAT BOY", [7] HASSAN AHMED DAHIR a/k/a “MOHAMED ALI HUSSEIN”, [8] FADUMO MOHAMED FARAH a/k/a “NAANA NAANA” a/k/a “GANGSTER BOO” a/k/a “BARNIE” , [9] IDRIS IBRAHIM FAHRA a/k/a “CHI TOWN”, [11] ABDULLAHI HASHI a/k/a “KAMAL”, [12] FATAH HAJI HASHI a/k/a “JERRY” a/k/a “JR”, [13] ABDIRAHMAN ABDIRAZAK HERSI a/k/a “BIGGIE”, [14] MUHIYADIN HASSAN HUSSEIN a/k/a "CD", [15] DAHIR NOR IBRAHIM a/k/a “DAHIR LUCKY”, [16] ABDIFATAH BASHIR JAMA a/k/a “CASH MONEY” a/k/a “OHIO”, [17] ANDREW KAYACHITH a/k/a "AK", [19] BASHIR YASIN MOHAMUD a/k/a “BR”, [20] MUSTAFA AHMED MOHAMED, [21] FUAD FAISAL NUR a/k/a “HANJULE”, [22] ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a “PINKY”, [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", [24] MOHAMED SHARIF OMAR a/k/a “MOE D” a/k/a “MOJO”, [25] HAMDI ALI OSMAN a/k/a “BIG HAMDI” a/k/a “BOSS LADY”, [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD", [29] YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a “BLACK CAT JUNIOR", did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person knowing and in reckless disregard of the fact that the person had not attained the age of 14 years and had not attained the age of 18 years and would be caused to engage in a commercial sex act, and knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and that means of force or fraud or a combination of such means would be used to cause a person to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a)(1).

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

JANE DOE ONE

3. From on or about December 21, 2005, through in or about June 2, 2008, Jane Doe One, a Somali female, was transported from the Minneapolis, Minnesota metropolitan area to Columbus, Ohio; Nashville, Tennessee; and other locations for the purpose of causing Jane Doe One to engage in a commercial sex act.

4. Jane Doe One, in December 2005, was less than 14 years of age. Jane Doe One turned 14 years of age in January 2006.

5. In or about December 2005 Jane Doe One was transported from Minneapolis, Minnesota, to an apartment in Nashville, Tennessee, located at 964 Village Hills Drive. This apartment was rented and occupied by [8] **FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE"**, Year of Birth (hereinafter "YOB") 1984, 21 years of age at this time. At that location [8] **FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE"**, [16] **ABDIFATAH BASHIR JAMA a/k/a "CASH MONEY" a/k/a "OHIO"**, YOB 1986, 19 years of age at this time, and [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"**, YOB 1983, 22 years of age at this time, caused Jane Doe One to engage in commercial sex acts for which they received things of value.

6. During the period Jane Doe One was at 964 Village Hills Drive, Nashville, Tennessee, other females who had not obtained 18 years of age were caused to engage in commercial sex acts at this location.

7. Upon leaving Nashville, Tennessee, Jane Doe One was transported with another female who had not obtained 18 years of age to Columbus, Ohio. The transportation of the other female was for the purpose of having that female engage in a commercial sex act in Columbus, Ohio.

8. In or about January 2006, Jane Doe One returned to the Minneapolis, Minnesota, metropolitan area. After returning to Minneapolis, Minnesota, Jane Doe One was approached by **[25] HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"**, YOB 1989, 17 years of age at that time. **[25] HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"** attempted to entice Jane Doe One into engaging in a commercial sex act.

9. From in or about October 2006 through in or about June 2007, Jane Doe One was transported from the Minneapolis, Minnesota, metropolitan area to Columbus, Ohio, for the purpose of engaging in a commercial sex act. Jane Doe One was 14 years of age in 2006 and turned 15 years of age in 2007. During this period, Jane Doe One was caused to engage in commercial sex acts by **[16] ABDIFATAH BASHIR JAMA a/k/a "CASH MONEY" a/k/a "OHIO"**, and **[24] MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"** as well as others known and unknown to the Grand Jury.

10. From on or about April 1, 2008, through June 2, 2008, Jane Doe One traveled to Seattle, Washington, for personal reasons. While in Seattle, Washington, Jane Doe One was directed to a residence by **[16] ABDIFATAH BASHIR JAMA a/k/a "CASH MONEY" a/k/a "OHIO"**,

and [24] MOHAMED SHARIF OMAR a/k/a “MOE D” a/k/a “MOJO”. At this residence Jane Doe One was sexually assaulted.

JANE DOE TWO

11. On or about November 26, 2006, Jane Doe Two, a Somali female and a person who had not obtained the age of 13 years, was enticed to engage in sex acts for the ultimate purpose of obtaining her for use in commercial sex acts.

12. On or about November 26, 2006, Jane Doe Two was enticed into engaging in a sex act with a person known as “BG”, whose identity is unknown. Present at the time of the sex act, in addition to “BG” were: [11] ABDULLAHI HASHI a/k/a “KAMAL”, YOB 1986, 20 years of age at this time, [21] FUAD FAISAL NUR a/k/a “HANJULE”, YOB 1986, 20 years of age at this time, and a person known as “DK”, whose identity is unknown.

13. On or about December 1, 2006, [11] ABDULLAHI HASHI a/k/a “KAMAL”, [21] FUAD FAISAL NUR a/k/a “HANJULE”, and others, transported Jane Doe Two from her house to an apartment located at 1374 Westminster, St. Paul, Minnesota, Apartment # A303, occupied and leased by [9] IDRIS IBRAHIM FAHRA a/k/a “CHI TOWN”, YOB 1987, 19 years of age at this time. At this apartment [11] ABDULLAHI HASHI a/k/a “KAMAL”, [21] FUAD FAISAL NUR a/k/a “HANJULE”, [9] IDRIS IBRAHIM FAHRA a/k/a “CHI TOWN”, and others engaged in sexual acts with Jane Doe Two. Other males arrived at the apartment and were charged money by [11] ABDULLAHI HASHI a/k/a “KAMAL”, [21] FUAD FAISAL NUR a/k/a “HANJULE”, and [9] IDRIS IBRAHIM FAHRA a/k/a “CHI TOWN” to engage in sexual acts with Jane Doe Two. This same activity occurred on multiple dates at this apartment. Jane Doe Two

was informed by the aforementioned defendants that selling Jane Doe Two for sex would be called a "Mission". It was a rule that members of the SOL/SM would not be charged for sex with Jane Doe Two as they were fellow gang members. This rule was applied through the time period of December 2006, through April 28, 2009.

14. The term "Mission", when referring to Jane Doe Two, at all times relevant to this Indictment, meant having Jane Doe Two engage in a sex act for money or other things of value.

15. Between in or about January 2007, through in or about May 5, 2007, on multiple occasions [11] **ABDULLAHI HASHI a/k/a "KAMAL"**, [21] **FUAD FAISAL NUR a/k/a "HANJULE"**, "BG" and "DK" transported Jane Doe Two to an apartment complex currently known as Park View Apartments, located at 1201 12th Avenue, Minneapolis, Minnesota. While driving to the apartment complex, one or more of the aforementioned males would make cellular phone calls asking persons if they wanted to engage in sex with Jane Doe Two. Upon arriving at the apartment complex, the aforementioned males would charge persons money to engage in sex acts with Jane Doe Two. Jane Doe Two was transported in a green mini van on many of these occasions.

16. On two separate occasions Jane Doe Two's mother confronted [11] **ABDULLAHI HASHI a/k/a "KAMAL"**, and [21] **FUAD FAISAL NUR a/k/a "HANJULE"** and other unindicted co-conspirators and told them that Jane Doe Two had not obtained the age of 13.

17. Jane Doe Two was introduced by [11] **ABDULLAHI HASHI a/k/a "KAMAL"** to [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, YOB 1987, by cellular telephone. [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, 18 years old at this time, exchanged text messages using cellular telephones with Jane Doe Two.

18. In May 2007, in Minneapolis, Minnesota, Jane Doe Two was transported by "BG" to meet [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**. Also present at this meeting was [21] **FUAD FAISAL NUR a/k/a "HANJULE"**. At this time [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"** engaged in a sex act with Jane Doe Two.

19. After engaging in the sex act with Jane Doe Two, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"** informed Jane Doe Two that they were then going to perform a "Mission". [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"** then approached males and attempted to have the males exchange money for sex with Jane Doe Two.

20. On or about May 6, 2007, [7] **HASSAN AHMED DAHIR a/k/a "MOHAMED ALI HUSSEIN"**, YOB 1989, 18 years of age at this time, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, and [29] **YASSIN ABDIRAHMAN YUSUF, a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, YOB 1989, 17 years of age at this time, and an unindicted co-conspirator who was a juvenile, drove Jane Doe Two from the Minneapolis, Minnesota, metropolitan area to Rochester, Minnesota, for the purpose of charging persons money to engage in sex with Jane Doe Two.

21. [11] **ABDULLAHI HASHI a/k/a "KAMAL"** informed Jane Doe Two that she would be contacted via telephone by a person called "Hollywood", who is [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**. Jane Doe Two then began to receive phone calls from [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**.

22. In or about July 2008, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, YOB 1990, and who is 18 years of age at this time, met Jane Doe Two in the Minneapolis, Minnesota,

metropolitan area. At this time [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** discussed "making money".

23. At the time period of meeting Jane Doe Two, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** was told by more than one person that Jane Doe Two was under 14 years of age.

24. From in or about July 2008 through in or about April 2009 [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** maintained contact with Jane Doe Two, through the use of cellular telephones and internet communication. During this period, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** discussed that he wanted Jane Doe Two to be his girl.

25. On or about April 17, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** contacted Jane Doe Two through the use of a cellular telephone and arranged to pick Jane Doe Two up at the high school Jane Doe Two was attending.

26. On or about April 17, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** went to the high school attended by Jane Doe Two and picked Jane Doe Two up in a vehicle. Accompanying [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** were [3] **AHMAD ABNULNASIR AHMAD a/k/a "FABULOUS"** YOB 1987, 22 years of age at this time, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, YOB 1989, 19 years of age at this time, and an unindicted unidentified person known as "Big Abdi". These persons took Jane Doe Two to the North Town Mall in the Minneapolis, Minnesota, metropolitan area. At this location [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** engaged in a sex act in the men's bathroom with Jane Doe Two.

27. Upon leaving the Mall [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, [3] **AHMAD ABNULNASIR AHMAD a/k/a "FABULOUS"**, [29] **YASSIN ABDIRAHMAN**

YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR", and the unindicted unidentified "Big Abdi" drove Jane Doe Two to an abandoned garage. At this location [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, engaged in a sex act with Jane Doe Two and the unindicted unidentified "Big Abdi" attempted to engage in a sex act with Jane Doe Two.

28. On April 23, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** contacted Jane Doe Two by cellular telephone and informed Jane Doe Two that he would pick Jane Doe Two up at school on Friday, April 24, 2009.

29. On Friday, April 24, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** picked Jane Doe Two up at her high school. Accompanying [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** was [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, YOB 1991, 18 years of age at this time, and one other person.

30. Jane Doe Two was then transported to the residence of [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, a house in the Minneapolis, Minnesota metropolitan area. Also at the house with Jane Doe Two were [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, YOB 1990, 19 years of age at this time, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, and two other persons.

31. At the residence, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** engaged in sex acts with Jane Doe Two and instructed Jane Doe Two to engage in sex acts with the other males. Jane Doe Two then engaged in a sex act(s) with [5] **ABDIKARIM OSMAN ALI a/k/a**

"HOMER" a/k/a "BIG ABDI", [17] ANDREW KAYACHITH a/k/a "AK", [2] ABDULLAHI SADE AFYARE a/k/a "FOREHEAD", and one other male.

32. Jane Doe Two was then taken shopping and the purchases were paid for by a credit card possessed by [17] **ANDREW KAYACHITH a/k/a "AK"**. Jane Doe Two was then taken by [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [17] **ANDREW KAYACHITH a/k/a "AK"** and [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** to an "African Party" at a local college.

33. After leaving the party, Jane Doe Two was taken to a room at the AmericInn, a hotel, located at 2050 Freeway Boulevard, Brooklyn Center, Minnesota. This room was rented by [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, YOB 1989, 20 years of age at this time, who was accompanied by [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**. [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, paid cash for the room and presented a Visa credit card showing the name of Liban Omar to hold the room.

34. At the time of arrival at the room, Jane Doe Two observed [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, to be in the room. Accompanying [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** and Jane Doe Two to the hotel room were [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, and [17] **ANDREW KAYACHITH a/k/a "AK"**.

35. Upon arriving at the hotel [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** provided money to the other males and instructed them to get something to eat. [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** remained at the hotel room with Jane Doe Two and engaged in sex acts with Jane Doe Two.

36. Jane Doe Two was at this hotel room Friday, April 24, 2009, and left on Saturday, April 25, 2009.

37. On or about Saturday, April 25, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** began to plan a trip to Nashville, Tennessee, for the purpose of transporting Jane Doe Two to Nashville to engage in commercial sex acts.

38. On or about Saturday, April 25, 2009, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, took Jane Doe Two to a location where he instructed Jane Doe Two to engage in a sex act with another male in exchange for a "blunt" worth of marijuana and such act and exchange did occur.

39. On a second occasion on or about Saturday, April 25, 2009, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** took Jane Doe Two to a location where he instructed Jane Doe Two to engage in a sex act with a male in exchange for marijuana and liquor. This act did occur and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** did receive marijuana and a bottle of E & J liquor in return.

40. On or about Saturday, April 25, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD,"** [17] **ANDREW KAYACHITH a/k/a "AK",** and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** transported Jane Doe Two to a location where [13] **ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE"**, YOB 1990, 19 years of age at this time, was present. At this location Jane Doe Two was provided to [13] **ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE"** for the purpose of sex. [13]

ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE" did engage in sex acts with Jane Doe Two.

41. On or about Saturday, April 25, 2009, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** transported Jane Doe Two to a house in the Minneapolis, Minnesota metropolitan area and engaged in sex acts with Jane Doe Two on April 25, 2009, and Sunday, April 26, 2009.

42. On or about Sunday, April 26, 2009, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, and [17] **ANDREW KAYACHITH a/k/a "AK"** picked Jane Doe Two and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** up from the residence. These persons then drove to a location and picked up [13] **ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE"**.

43. On or about Sunday, April 26, 2009, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, and [13] **ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE"** discussed raising money for the trip to Nashville, Tennessee, and began making calls to persons offering Jane Doe Two for the purpose of commercial sex acts. This was done in an attempt to raise money for the trip to Nashville, Tennessee.

44. On or about Sunday, April 26, 2009, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, and [13] **ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE"** transported Jane Doe Two to a location in the

Minneapolis, Minnesota, metropolitan area and delivered her to a person for the purpose of engaging in a sex act in exchange for money.

45. Between on or about Sunday April 26, 2009, and on or about Monday, April 27, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, transported Jane Doe Two from the Minneapolis, Minnesota, metropolitan area to Nashville, Tennessee for the purpose of causing Jane Doe Two to engage in commercial sex acts.

46. During the course of transporting Jane Doe Two, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, made a cell phone video recording of Jane Doe Two engaging in sex acts with the occupants of the vehicle. [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, transmitted this video by cell phone to other persons.

47. Upon arriving in Nashville, Tennessee, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [17] **ANDREW KAYACHITH a/k/a "AK"** and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** and Jane Doe Two checked into a room at the Rodeway Inn, located at 888 Murfreesboro Road, Nashville, Tennessee.

48. [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** was to provide Jane Doe Two to [6] **MUSSE AHMED ALI a/k/a "FAT BOY,"** YOB 1987, 22 years of age at the time,

for him to "enjoy". [6] **MUSSE AHMED ALI a/k/a "FAT BOY"** was to assist in causing Jane Doe Two to engage in commercial sex acts.

49. On or about Tuesday, April 28, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, and Jane Doe Two went to a Somali restaurant on Murfreesboro Road, Nashville, Tennessee. After eating, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** separated from the others and met with an unindicted co-conspirator, YOB 1992, 17 years of age at the time, and [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"**, 26 years of age at this time. The others, including Jane Doe Two, left in the vehicle.

50. Upon leaving the Somali restaurant, the car in which [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"**, and Jane Doe Two were riding was stopped by Nashville, Tennessee, police officers. During the course of the stop, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** and an unindicted co-conspirator walked up to and approached the officers. At this time [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** were arrested for contributing to the delinquency of a minor, as Jane Doe Two had been reported as a runaway.

51. Prior to being taken into custody, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** gave his cellular telephone to an unindicted co-conspirator to prevent officers from finding evidence of the nature of the crime being committed.

JANE DOE THREE

52. From on or about February 1, 2008, to on or about February 6, 2008, Jane Doe Three, an African American Female and a person who had not obtained the age of 18 years, was enticed to travel in interstate commerce from Minnesota to Nashville, Tennessee, for the purpose of engaging in commercial sex acts.

53. On or about February 1, 2008, the exact date being unknown, while living in Minnesota, Jane Doe Three had an argument with her mother and left the house. At this time Jane Doe Three was 15 years of age. Subsequent to the argument, Jane Doe Three called [25] **HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"**, 18 years of age at this time. At this time, [25] **HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"** was in Nashville, Tennessee.

54. In February 2008, Jane Doe Three was aware that [25] **HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"**, had girls that engaged in sex acts for money or other items.

55. In February 2008, when Jane Doe Three called [25] **HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"**, Osman told her that she would support her, giving her a place to stay and food.

56. [25] **HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"** expected Jane Doe Three to engage in commercial sex acts in exchange for Osman's support.

57. On or about February 5, 2008, Jane Doe Three's mother arrived in Nashville, Tennessee and obtained Jane Doe Three from the presence of [25] **HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY"**. At this time, Osman informed Jane Doe Three's mother that she had not invited Jane Doe Three to Nashville, Tennessee, and that Jane Doe Three had come to Nashville, Tennessee, without Osman's permission.

JANE DOE FOUR

58. During 2007, 2008, and part of 2009, Jane Doe Four had not obtained the age of 18 years.

59. On or about March 11, 2010, Jane Doe Four was transported by [19] **BASHIR YASIN MOHAMUD a/k/a "BR"** and others to the Motel 6, 7640 Cedar Avenue South, Richfield, Minnesota. At this time, Jane Doe Four was 18 years of age.

60. [19] **BASHIR YASIN MOHAMUD a/k/a "BR"** rented a room at the Motel 6, 7640 Cedar Avenue South, Richfield, Minnesota. In this room, [19] **BASHIR YASIN MOHAMUD a/k/a "BR"**, [20] **MUSTAFA AHMED MOHAMED**, and other males through force and fraud, had non-consensual sex with Jane Doe Four.

OTHER ACTS

61. From in or about 2000 through in or about 2006, [1] **ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO"** transported and caused the transportation and harbored Somali females who had not attained the age of 14 years and had not attained the age of 18 years for the purpose of commercial sex acts affecting interstate commerce.

62. From in or about 2000 through in or about 2009 [15] **DAHIR NOR IBRAHIM a/k/a "DAHIR LUCKY"** transported and caused the transportation and harbored Somali females who had not attained the age of 14 years and had not attained the age of 18 years for the purpose of commercial sex acts affecting interstate commerce.

63. On or about June 8, 2009, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** rented a room at the Super 8 Motel, 720 Royal Parkway, Nashville, Tennessee, for the purpose of using the room to facilitate a commercial sex act.

64. On or about August 23, 2009, [6] **MUSSE AHMED ALI a/k/a "FAT BOY"**, spoke to [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**. [6] **MUSSE AHMED ALI a/k/a "FAT BOY"** asked [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** what was new in Tennessee. In the conversation [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** told [6] **MUSSE AHMED ALI a/k/a "FAT BOY"** that in Tennessee a "little teenager girl came up and she is hot" and was giving the "whole block" oral sex. [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** stated that the teenage girl was in Minnesota. [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** reiterated that the girl was a "little girl".

65. On or about August 23, 2009, [6] **MUSSE AHMED ALI a/k/a "FAT BOY"**, spoke to an unknown person and told that person that he had spoken to CD and that CD told him there was a "little girl" that provides oral sex. The unknown person confirmed that there was such a person, stating "... she is a really young one, she just came out now... She just developed right now. She started giving blow jobs to everybody".

66. During the period of the conspiracy, co-conspirators known and unknown, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means knowing and in

reckless disregard of the fact that the person had not attained the age of 14 years and had not attained the age of 18 years and would be caused to engage in a commercial sex act and knowing and in reckless disregard of the fact that the person had not attained the age of 18 years, and by means of force or fraud or a combination of such means would be used to cause a person to engage in a commercial sex act. As a result, other minor children in addition to Jane Doe One, Jane Doe Two, Jane Doe Three, and Jane Doe Four were involved in the conspiracy.

All in violation of Title 18, United States Code, Section 1594(c) and Title 18, United States Code, Section 2.

COUNT TWO

The Grand Jury Further Charges:

67. From in or about January 2000, through in or about July 2010, the exact dates being unknown to the Grand Jury, in the Middle District of Tennessee and elsewhere, [1] ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO", [2] ABDULLAHI SADE AFYARE a/k/a "FOREHEAD", [3] AHMAD ABNULNASIR AHMAD a/k/a "FABULOUS", [5] ABDIKARIM OSMAN ALI, a/k/a "HOMER" a/k/a "BIG ABDI", [6] MUSSE AHMED ALI a/k/a "FAT BOY", [7] HASSAN AHMED DAHIR a/k/a "MOHAMED ALI HUSSEIN", [8] FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE", [9] IDRIS IBRAHIM FAHRA a/k/a "CHI TOWN", [11] ABDULLAHI HASHI a/k/a "KAMAL", [12] FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR", [13] ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE", [14] MUHIYADIN HASSAN HUSSEIN a/k/a "CD", [15] DAHIR NOR IBRAHIM a/k/a "DAHIR LUCKY", [16]

ABDIFATAH BASHIR JAMA a/k/a "CASH MONEY" a/k/a "OHIO", [17] ANDREW KAYACHITH a/k/a "AK", [19] BASHIR YASIN MOHAMUD a/k/a "BR", [20] MUSTAFA AHMED MOHAMED, [21] FUAD FAISAL NUR a/k/a "HANJULE", [22] ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY", [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", [24] MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO", [25] HAMDİ ALI OSMAN a/k/a "BIG HAMDİ" a/k/a "BOSS LADY", [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD", [29] YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR" did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to benefit financially and by receiving anything of value, from participation in a venture which engaged in an act of recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means a person knowing and in reckless disregard of the fact that the person had not attained the age of 14 years and had not attained the age of 18 years would be caused to engage in a commercial sex act and knowing and in reckless disregard of the fact that the person had attained the age of 18 years and that means of force or fraud or a combination of such means would be used to cause a person to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a)(2).

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

68. The allegations of Paragraphs 1 and 3 through 66 are hereby re-alleged and incorporated as if fully set forth herein.

69. During the period of the conspiracy, co-conspirators known and unknown, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means knowing and in reckless disregard of the fact that the person had not attained the age of 14 years and had not attained the age of 18 years and would be caused to engage in a commercial sex act and knowing and in reckless disregard of the fact that the person had attained the age of 18 years, that means of force or fraud or a combination of such means would be used to cause a person to engage in a commercial sex act. As a result, other minor children in addition to Jane Doe One, Jane Doe Two, Jane Doe Three, and Jane Doe Four were involved in the conspiracy.

All in violation of Title 18, United States Code, Section 1594(c) and Title 18, United States Code, Section 2.

COUNT THREE

The Grand Jury Further Charges:

70. From on or about April 28, 2009, through in or about May 2009, the exact dates being unknown to the Grand Jury, in the Middle District of Tennessee and elsewhere, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"**, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"**, [25] **HAMDİ ALİ OSMAN a/k/a "BIG HAMDİ" a/k/a "BOSS LADY"**, and [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to knowingly corruptly persuade another person, or attempt to do so, to alter, destroy, mutilate, or conceal an object with the intent

to impair the object's integrity and availability for use in an official proceeding and with intent to hinder, delay, and prevent the communication to a law enforcement officer of information relating to the commission or possible commission of a Federal Offense, in violation of Title 18, United States Code, Sections 1512(b)(1), 1512(b)(2) and 1512(b)(3) and 1512(c)(1) and 1512(c)(2).

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

71. On April 29, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, provided his cellular phone to an unindicted co-conspirator, a juvenile at the time, for the purpose of concealing the cellular phone from law enforcement.

72. On or about April 30, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, spoke to [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, and asked Abdifatah Omar to talk to Jane Doe Two's parents. Abdifatah Omar stated that he would do so. Haji Salad told Abdifatah Omar to make sure Jane Doe Two's family cannot come to court.

73. On or about April 30, 2009, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** told [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** that Salad's phone was with unindicted co-conspirator, a juvenile at the time, and that if law enforcement had found the phone he (Salad) would have been in big trouble. [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** confirmed he gave the phone to unindicted co-conspirator, a juvenile at the time.

74. On or about April 30, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** asked [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, if "they" had talked to Jane Doe Two's family and Liban Omar confirmed that "we" will talk to the family. [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** confirmed he would talk to Jane Doe Two's family.

75. On or about April 30, 2009, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** told [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** that he had attempted to talk to Jane Doe Two but that she would not answer her phone and they discussed who might be able to talk to Jane Doe Two "straight".

76. On or about May 1, 2009, [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"**, told [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** that Jane Doe Two's parents, and a relative were in Nashville, Tennessee. [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"** told [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** that he knew a relative of Jane Doe Two and would be talking to him that night.

77. On or about May 2, 2009, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"** spoke to a person inquiring whether anyone had spoken to Jane Doe Two's family. [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"** was told that the number for Jane Doe Two's family had been provided to Hamdi and she would speak to the family.

78. On or about May 3, 2009, [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"**, confirmed to [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** that an unindicted co-conspirator, a juvenile at the time, had Salad's cellular phone.

79. On or about May 3, 2009, [14] MUHIYADIN HASSAN HUSSEIN a/k/a "CD", informed [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD" that he and others had called Jane Doe Two's sister and attempted to talk to her.

80. On or about May 3, 2009, [14] MUHIYADIN HASSAN HUSSEIN a/k/a "CD", spoke to [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD" and discussed a fabricated story to tell [26] HAJI OSMAN SALAD's a/k/a "HOLLYWOOD" attorney regarding [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD" arriving in Nashville, Tennessee on a Greyhound bus.

81. On or about May 5, 2009, [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", told [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD" that Jane Doe Two told the police that Salad had driven the car from Minnesota to Nashville and that he (Liban Omar) told the lawyer that Haji Salad had come to Nashville on the Greyhound bus and that Haji Salad was with Liban Omar's brother.

All in Violation of Title 18, United States Code, Section 1512(k) and Title 18, United States Code, Section 2.

COUNT FOUR

The Grand Jury Further Charges:

82. From on or about April 28, 2009, through in or about May 2009, the exact dates being unknown to the Grand Jury, in the Middle District of Tennessee and elsewhere, [2] ABDULLAHI SADE AFYARE a/k/a "FOREHEAD", [14] MUHIYADIN HASSAN HUSSEIN a/k/a "CD", [22] ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY", [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", [24] MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a

“MOJO”, [25] HAMDI ALI OSMAN a/k/a “BIG HAMDI” a/k/a “BOSS LADY”, and [26] HAJI OSMAN SALAD a/k/a “HOLLYWOOD”, knowingly did attempt to obstruct, and in any way interfere with and prevent the enforcement of Title 18, United States Code, Section 1591(a).

In Violation of Title 18, United States Code, Section 1591(d) and Title 18, United States Code, Section 2.

COUNT FIVE

The Grand Jury Further Charges:

83. On or about January 27, 2010, in the Middle District of Tennessee, **[10] YASIN AHMED FARAH**, while under oath and testifying in a proceeding before Grand Jury Panel One, a Grand Jury of the United States in the Middle District of Tennessee, knowingly did make a false material declaration, that is to say:

“To see her, you know.” and “It is like, ‘let’s hang out.’ If you ask me, to me, that is equivalent of ‘let’s hang out’

84. At the time and place aforesaid, the grand jury was conducting an investigation to determine whether violations of Title 18, United States Code, Section 1591 et. seq. had been committed, and to identify the persons who had committed, caused the commission of, and conspired to commit such violations. It was material to the said investigation that the grand jury ascertain the meaning of the word “mission” as used by **[10] YASIN AHMED FARAH**.

85. At the time and place alleged, **[10] YASIN AHMED FARAH**, appearing as a witness under oath at a proceeding before the grand jury knowingly made the following declaration in response to questions with respect to the material matter alleged as follows:

Q. So the response was: *Watts good bout the mission. . . .* Now, when you sent the message, I have got a good mission for you, what did you mean?

A. To see her, you know.

Q. So when you have heard the word mission used as in "I want to see you," how would somebody know you want to see them if you say I have a mission for you?

A. She is a beautiful girl, so I used to try to contact her previously, and she used to avoid me. So that is why I sent that to her.

Q. How does the word mission come to mean, "I want to see you"

A. It is like, "let's hang out." If you ask me, to me, that is equivalent of "let's hang out"

86. The aforesaid testimony of [10] **YASIN AHMED FARAH**, as he then and there well knew and believed, was false in that, on January 27, 2010, [10] **YASIN AHMED FARAH** knew that the word "mission" as used with the recipient of his message did not mean "lets hang out".

All in violation of 18, United States Code, Section 1623(a).

COUNT SIX

The Grand Jury Further Charges:

87. On or about January 27, 2010, in the Middle District of Tennessee, [10] **YASIN AHMED FARAH**, did corruptly and intentionally, obstruct, influence, and impede an official proceeding, to wit a Federal Grand Jury, by providing false and misleading testimony to the Federal Grand Jury.

In violation of Title 18, United States Code, Section 1512(c)(2).

COUNT SEVEN

The Grand Jury Further Charges:

88. On or about January 27, 2010, in the Middle District of Tennessee, [10] **YASIN AHMED FARAH**, knowingly did attempt to obstruct, or in any way interfere with or prevent the enforcement of Title 18, United States Code, Section 1591.

In violation of Title 18, United States Code, Section 1591(d).

COUNT EIGHT

The Grand Jury Further Charges:

89. On or about June 16, 2010, in the Middle District of Tennessee, [27] **BIBI AHMED SAID**, while under oath and testifying in a proceeding before Grand Jury Panel One, a Grand Jury of the United States in the Middle District of Tennessee, knowingly did make a false material declaration, that is to say:

No. I have not seen her.

No.

Positive.

Yes.

Yes.

Yeah.

Not that I know of.

No.

Yeah.

Yes.

Yes I am positive.

....

I don't know her that much. I seen her around.

No, never did.

Positive.

....

No.
Yes.
Absolutely positive.
No.
Not at all.
No.
....
No.
No, not at all.
No.
No
That was the last time I saw her.
Yes. Yes.
No, I never seen her, that was the last time.

90. At the time and place aforesaid the grand jury was conducting an investigation to determine whether violations of Title 18, United States Code, Section 1591 et. seq. had been committed, and to identify the persons who had committed, caused the commission of, and conspired to commit such violations. It was material to the said investigation that the grand jury ascertain the identity of persons involved in a sexual assault or that may be witnesses or have information regarding Jane Doe Four and the events that occurred on or about March 11, 2010.

91. At the time and place alleged, [27] **BIBI AHMED SAID**, appearing as a witness under oath at a proceeding before the grand jury knowingly made the following declaration in response to questions with respect to the material matter alleged as follows:

Q. After that meeting in February of 2010, when was the next time you saw _____ (Jane Doe Four) or have you seen her since?

A. No. I have not seen her.

Q. You have not seen her at all since February of 2010?

A. No.

Q. Absolutely positive.

A. Positive.

Q. No doubt in your mind?
A. Yes.
Q. Absolutely no doubt in your mind?
A. Yes.
Q. You have not seen her since February of 2010?
A. Yeah.
Q. At any location?
A. Not that I know of.
Q. Under any circumstances?
A. No.
Q. Absolutely positive?
A. Yeah.
Q. No doubt in your mind?
A. Yes.
Q. Anything about that you want to change?
A. I don't remember.
Q. But you say absolutely positive, no doubt in your mind?
A. Yes I am positive.

....

Q. Since leaving from the airport, did you see her? Have you seen her since that time?
A. No.
Q. So the last place you saw her was at the airport in Minneapolis?
A. Yes.
Q. Are you positive about that?
A. Absolutely positive.
Q. No doubt in your mind?
A. No.
Q. Absolutely no doubt in your mind?
A. Not at all.
Q. Anything about that you want to change?
A. No.

....

Q. And after you left the airport you didn't see _____ (a juvenile) again - -
A. No.
Q. Not even until this day?
A. In Minneapolis?
Q. Anywhere, any location?
A. No, not at all.
Q. Whether Minneapolis or Richfield or Egan?

A. No.

Q. Any city any place, anywhere?

A. No

Q. Other than at the airport in Minneapolis when you split up.

A. That was the last time I saw her.

Q. Never at the same location together since the airport on or about March 11th of 2010?

A. Yes. Yes.

Q. Yes, some other place?

A. No, I never seen her, that was the last time.

92. The aforesaid testimony of [27] **BIBI AHMED SAID**, as she then and there well knew and believed, was false in that, on June 16, 2010, [27] **BIBI AHMED SAID** had been present with Jane Doe Four subsequent to February 2010, in that on or about March 11, 2010, [27] **BIBI AHMED SAID** met with Jane Doe Four at the Hennepin County Medical Center, Minneapolis, Minnesota, where [27] **BIBI AHMED SAID** told Jane Doe Four not to provide law enforcement information regarding the sexual assault of Jane Doe Four and not to mention "Biggie's" name.

93. Furthermore, the aforesaid testimony of [27] **BIBI AHMED SAID**, as she then and there well knew and believed, was false in that on June 16, 2010, [27] **BIBI AHMED SAID** was with _____ (A Juvenile) on March 11, 2010, after leaving the Minneapolis - St. Paul International Airport and did go with _____ (A Juvenile) to the Hennepin County Medical Center, Minneapolis, Minnesota, where [27] **BIBI AHMED SAID** and _____ (A Juvenile) met with Jane Doe Four and were told information regarding the sexual assault of Jane Doe Four by Jane Doe Four.

All in violation of 18, United States Code, Section 1623(a).

COUNT NINE

The Grand Jury Further Charges:

94. On or about June 16, 2010, in the Middle District of Tennessee, [27] **BIBI AHMED SAID**, did corruptly and intentionally, obstruct, influence, and impede an official proceeding, to wit a Federal Grand Jury, by providing false and misleading testimony to the Federal Grand Jury.

In violation of Title 18, United States Code, Section 1512(c)(2).

COUNT TEN

The Grand Jury Further Charges:

95. On or about June 16, 2010, in the Middle District of Tennessee, [27] **BIBI AHMED SAID**, knowingly did attempt to obstruct, or in any way interfere with or prevent the enforcement of Title 18, United States Code, Section 1591.

In violation of Title 18, United States Code, Section 1591(d).

COUNT ELEVEN

The Grand Jury Further Charges:

96. From on or about December 23, 2005, through on or about June 2, 2008, the exact dates unknown to the Grand Jury, in the Middle District of Tennessee and elsewhere, in and affecting interstate commerce, [8] **FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE"**, [16] **ABDIFATAH BASHIR JAMA a/k/a "OHIO" a/k/a "CASH MONEY"**, and [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"**, knowingly recruited, enticed, harbored, transported, provided and obtained by any means,

a minor under the age of 14, namely, Jane Doe One, knowing that means of force, threats of force, fraud, and coercion and knowing that Jane Doe One had not attained the age of 18 years and knowing that Jane Doe One would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and Title 18, United States Code, Section 2.

COUNT TWELVE

The Grand Jury Further Charges:

97. From on or about December 1, 2006, through on or about April 28, 2009, in the Middle District of Tennessee and elsewhere, in and affecting interstate commerce, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [7] **HASSAN AHMED DAHIR a/k/a "MOHAMED ALI HUSSEIN"**, [9] **IDRIS IBRAHIM FAHRA a/k/a "CHI TOWN"**, [11] **ABDULLAHI HASHI a/k/a "KAMAL"**, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, [13] **ABDIRAHMAN ABDIRAZAKHERSI a/k/a "BIGGIE"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, [21] **FUAD FAISAL NUR a/k/a "HANJULE"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** knowingly recruited, enticed, harbored, transported, provided and obtained by any means, a minor under the age of 14, namely, Jane Doe Two, knowing that Jane Doe Two had not attained the age of 18 years and knowing that Jane Doe Two would be caused to engage in a commercial sex act.

Code, Section 2.

COUNT THIRTEEN

The Grand Jury Further Charges:

98. From on or about December 1, 2006, through on or about April 28, 2009, in the Middle District of Tennessee and elsewhere, in and affecting interstate commerce, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [5] **ABDIKARIM OSMAN ALI a/k/a "HOMER" a/k/a "BIG ABDI"**, [7] **HASSAN AHMED DAHIR a/k/a "MOHAMED ALI HUSSEIN"**, [9] **IDRIS IBRAHIM FAHRA a/k/a "CHI TOWN"**, [11] **ABDULLAHI HASHI a/k/a "KAMAL"**, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, [13] **ABDIRAHMAN ABDIRAZAKHERSI a/k/a "BIGGIE"**, [17] **ANDREW KAYACHITH a/k/a "AK"**, [21] **FUAD FAISAL NUR a/k/a "HANJULE"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** knowingly attempted to recruit, entice, harbor, transport, provide and obtain by any means, a minor under the age of 14, namely, Jane Doe Two, knowing that Jane Doe Two had not attained the age of 18 years and knowing that Jane Doe Two would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a).

In violation of Title 18, United States Code, Section 1594(a) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

The Grand Jury Further Charges:

99. On or about February 2, 2008, in the Middle District of Tennessee and elsewhere, in and affecting interstate commerce, [25] **HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSSLADY"**, knowingly attempted to recruit, entice, harbor, transport, provide and obtain by any means, a minor, namely, Jane Doe Three, knowing that Jane Doe Three had not attained the age of 18 years and knowing that Jane Doe Three would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a).

In violation of Title 18, United States Code, Section 1594(a) and Title 18, United States Code, Section 2.

COUNT FIFTEEN

The Grand Jury Further Charges:

100. From on or about May 20, 2006, through on or about September 15, 2006, in the Middle District of Tennessee and elsewhere, [4] **YAHYA JAMAL AHMED**, [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"**, [16] **ABDIFATAH BASHIR JAMA a/k/a "OHIO" a/k/a "CASH MONEY"**, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, and [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"** did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to transport in interstate commerce goods, wares,

merchandise, securities, and money of the value of \$5000 or more knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2314.

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

101. On or about May 20, 2006, the exact date unknown, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, spoke with an unindicted co-conspirator regarding burglarizing the Dahabshil, Inc., located at 1007 Murfreesboro Road, Nashville, Tennessee.

102. On May 22, 2006, [16] **ABDIFATAH BASHIR JAMA a/k/a "OHIO" a/k/a "CASH MONEY"**, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, and [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"** went to Dahabshil, Inc., located at 1007 Murfreesboro Road, Nashville, Tennessee, where members of the conspiracy entered Dahabshil, Inc., located at 1007 Murfreesboro Road, Nashville, Tennessee, at approximately 2:51 a.m. without permission and removed the safe, obtaining approximately \$120,000 in cash, approximately \$30,000 in payroll checks and approximately \$4000 in phone cards.

103. On or about May 23, 2006, the exact date unknown, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, transported the \$120,000 in cash from the State of Tennessee to the State of Minnesota.

104. In or about September 2006, [4] **YAHYA JAMAL AHMED**, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"**, [16]

ABDIFATAH BASHIR JAMA a/k/a "OHIO" a/k/a "CASH MONEY", [22] ABDIFATAH

SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY", [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", traveled from Tennessee to Columbus, Ohio for the purpose of burglarizing businesses to obtain money and merchandise over a value of \$5000.

105. On or about September 13, 2006, members of the conspiracy entered the Tawakal Market, 4220 - 26 Westview Center Plaza, Columbus, Ohio, 43228, and did take \$1700 in cash and \$7049 in phone cards.

106. On or about September 15, 2006, members of the conspiracy entered Dahabshil, Inc., 2273 Morse Road, Columbus, Ohio, at approximately 3:24 a.m. without permission for the purpose of taking money.

All in violation of Title 18, United States Code, Section 371 and Title 18, United States Code, Section 2.

COUNT SIXTEEN

The Grand Jury Further Charges:

107. From on or about February 4, 2010, through on or about February 12, 2010, in the Middle District of Tennessee and elsewhere, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY", [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD",** did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to transport in interstate commerce a motor vehicle knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2312.

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

108. On or about February 4, 2010, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, went to Crest Cadillac located at 2121 Rosa L. Parks Blvd. Nashville, Tennessee 37228 and had a key made for a 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxxxx9037.

109. On or about February 9, 2010, a 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxxxx9037, was stolen from an address on Bonnomeade Drive, Nashville, Tennessee.

110. On February 12, 2010, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, registered the 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxxxx9037 at the Franklin County, Ohio, Bureau of Motor Vehicles.

111. On February 12, 2010, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** produced a stolen driver's license in the name of Mohamed Hussein and represented himself as Mohamed Hussein for the purpose of registering the vehicle.

112. On February 12, 2010, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** provided an address on a street known as Garden Terrace, Columbus, Ohio, to which he had no connection. [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** used the name of Mohamed Hussein and this address for the purpose of registering the vehicle.

All in violation of Title 18, United States Code, Section 371 and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

The Grand Jury Further Charges:

113. From on or about February 4, 2010, through on or about September 13, 2010, in the Middle District of Tennessee and elsewhere, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to knowingly possess and use an identification document without lawful authority in and affecting interstate commerce, a means of identification of another person with the intent to commit and aid and abet in connection with any unlawful activity that constitutes a violation of federal law, that is violations of Title 18, United States Code, Sections 2312 and 1029(a), in violation of Title 18, United States Code, Section 1028 (a)(7).

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

114. The allegations of Paragraphs 108 through 112 are hereby re-alleged and incorporated as if fully set forth herein.

115. On or about February 1, 2010, the exact date unknown, a driver's license issued by the State of Tennessee in the name of Mohamed Hussein was obtained in Nashville, Tennessee, for the purpose of stealing and transporting in interstates commerce a vehicle and to assist in the commission of access device fraud.

possessed two separate driver's licenses, one a Missouri state driver's license in the name of a Said Ali and the other a Minnesota state driver's license in the name of Liban Said Mohamed for the purpose of using the identification in connection with counterfeit credit cards bearing the same names.

All in violation of Title 18, United States Code, Section 1028 (f) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

The Grand Jury Further Charges:

117. From in or about 2007, through on or about September 13, 2010, in the Middle District of Tennessee and elsewhere, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [4] **YAHYA JAMAL AHMED**, [6] **MUSSE AHMED ALI a/k/a "FAT BOY"**, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, [13] **ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE"**, [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"**, [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"**, [21] **FUAD FAISAL NUR a/k/a "HANJULE"**, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"**, and [29] **YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR"** did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to knowingly and with intent to defraud produce, use, and traffic in one or more counterfeit access devices and to knowingly

and with intent to defraud traffic in and use one or more unauthorized access devices during any one-year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, and to knowingly and with intent to defraud possess fifteen or more devices which are counterfeit or unauthorized access devices, in violation of Title 18, United States Code, Sections 1029(a)(1), 1029(a)(2), and 1029(a)(3) .

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

118. The allegations of Paragraphs 108 through 112 and 115 through 116 are hereby re-alleged and incorporated as if fully set forth herein.

119. From in or about 2007 through in or about 2009, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"**, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, and [24] **MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO"**, and others known and unknown to the grand jury did possess and traffic in one or more access devices.

120. On or about April 28, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, possessed multiple counterfeit access devices in his vehicle in Nashville, Tennessee.

121. On or about April 28, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, threw two counterfeit access devices, that is two counterfeit credit cards purported to be issued by

Bank of America, into bushes on Murfreesboro Road, Nashville, Tennessee, to prevent the police from discovering the counterfeit access devices.

122. On May 1, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** directed an unindicted co-conspirator, to break into the Metropolitan Police Department, Nashville, Tennessee auto impound lot to obtain counterfeit access devices and device making equipment, designed or primarily used for making an access device or counterfeit access device.

123. On May 5, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** instructed [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** to retrieve the two counterfeit credit cards thrown into bushes on Murfreesboro Road, Nashville, Tennessee.

124. On May 5, 2009, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** went to a location on Murfreesboro Road to retrieve the two counterfeit credit cards.

125. On August 13, 2009, [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"**, stated that he and [21] **FUAD FAISAL NUR a/k/a "HANJULE"**, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** were "shopping" for items that have "cannon" written on them and intended to clean the whole place.

126. In or about September 2009, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, possessed counterfeit credit cards.

127. From, between in or about September 2009 to in or about January 2010 [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, provided counterfeit access devices to [4] **YAHYA JAMAL AHMED** and other members of the SOL.

128. On July 27, 2009, [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, asked [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** to call a Minneapolis police

detective and tell the detective to drop charges pending against [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**. The reason [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"** wanted the charges dropped was that he desired to continue to "work" (to commit access device fraud) with [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"**. [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** replied that he wanted to keep doing "business" with [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**.

129. On August 23, 2009, [6] **MUSSE AHMED ALI a/k/a "FAT BOY"**, spoke to [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** and asked [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** how many cards and numbers [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** had. [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"** responded that he had "just got this one from Haji" and went to Walgreens.

130. On August 15, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** and [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, used one counterfeit credit card at a Walgreens, located in Maple Grove, Minnesota, to purchase \$333.90 worth of goods.

131. On August 15, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** and [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, used one counterfeit credit card at a Wal-Mart located in Maple Grove, Minnesota, purchasing \$1009.91 in goods.

132. On September 27, 2009, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** and [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, went to a Wal-Mart in Maple Grove, Minnesota, and purchased \$668.32 worth of goods with counterfeit credit cards.

133. On or about February 4, 2010, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, went to Crest Cadillac located at 2121 Rosa L. Parks Boulevard,

Nashville, Tennessee, 37228 and had a key made for a 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxx9037 for the purpose of using a stolen vehicle to commit crimes involving counterfeit access devices, unauthorized access devices and device making equipment.

134. On or about February 9, 2010, a 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxx9037, was stolen from an address on Bonnomeade Drive, Nashville, Tennessee.

135. On February 12, 2010, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, and [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**, registered the 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxx9037 at the Franklin County, Ohio, Bureau of Motor Vehicles for the purpose of using the vehicle to commit crimes involving counterfeit access devices, unauthorized access devices and device making equipment.

136. On February 22, 2010, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** attempted to use a counterfeit access device at a Wal-Mart Store in West St. Paul, Minneapolis to purchase over \$400 in merchandise.

137. On March 5, 2010, [4] **YAHYA JAMAL AHMED**, [21] **FUAD FAISAL NUR a/k/a "HANJULE"**, and [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, possessed a laptop computer with unauthorized access devices and device making equipment.

138. On March 16, 2010, an unknown co-conspirator went to a Geico Direct Office located at 7370 Sawmill Road, Unit 2720 Agora, Columbus, Ohio 43235. At this location the unknown co-conspirator obtained auto insurance for the 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxx9037. The insurance policy was issued under the name Mohamed Hussein and the address provided for the policy was on Garden Terrace, Columbus, Ohio. The amount of cash paid

for the policy was \$129.00, which constituted a partial payment on the policy. The insurance was necessary to obtain the Escalade from the Eagan Minnesota Police Department impound lot.

139. On March 27, 2010, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** and [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"**, while driving the stolen 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxxxx9037 traveled from Minneapolis, Minnesota, to Kansas City, Missouri, for the purpose of using counterfeit access devices and used counterfeit access devices and unauthorized access devices at the following location:

A. Foot Action in the amount of \$198.99

140. On March 28, 2010, while in Kansas City, Missouri, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** and [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** went to the following locations and used and attempted to use counterfeit access devices and unauthorized access devices:

A. Dillard's Department Store in the amount of \$334.55 and \$398.85;

B. Macy's Department Store in the amount of \$226.77 and \$538.44;

C. Wal-Mart Store in the amount of \$1040.46 and \$650.96;

D. Toys R Us Store in the amount of \$225.65 and \$300.00; and

E. Waffle House in the amount of \$25.74.

141. On March 28, 2010, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** and [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"**, while driving a stolen 2002 Cadillac Escalade, Vehicle Identification No. xxxxxxxxxxxxxxx9037

traveled from Kansas City, Missouri, to Apple Valley, Minnesota, and used counterfeit access devices and unauthorized access devices at the following location:

A. Wal-Mart Store in the amount of \$210.84.

142. On March 28, 2010, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** and [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** possessed a laptop computer containing unauthorized access devices totaling approximately 561 separate credit card numbers.

143. On March 28, 2010, through March 29, 2010, in Ramsey County, Minnesota, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, spoke to [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** and instructed him to tell [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** not to speak to the police regarding the possession of the counterfeit and unauthorized access devices. [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** spoke to [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** and told him not to talk to the police about [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** as he was their "friend". [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** also told [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** to be sure to say the same thing as [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"** as the police did not know anything.

144. On March 29, 2010, [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** asked [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** to call an unknown person to "call it for him and take everything out of there". [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** confirmed that the unknown person knew everything. [18]

ABDIGADIR AHMED KHALIF a/k/a "AWALI" stated "I will take everything out of there".

[18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** went to the location and [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** told [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"** to "clear the whole place".

145. On March 29, 2010, [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, while in Minneapolis, Minnesota, was in possession of a Tennessee Driver's Licence in the name of Mohamed Hussein which was used to register the stolen Cadillac Escalade in Ohio.

146. On May 23, 2010, in Minneapolis, Minnesota, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** and [23] **LIBAN SHARIF OMAR a/k/a "SUNDERRA"**, possessed counterfeit credit cards and device making equipment, that is a magnetic stripe reader/writer. This device making equipment contained 12 separate credit card numbers which did not belong to the defendants.

147. On August 10, 2010, [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"** and [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"** attempted to use four or more counterfeit credit cards and did use at least one counterfeit credit card at a Macy's Department Store, Burnsville, Minnesota.

148. From on or about February 9, 2009, through on or about August 29, 2010, [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** possessed 166 separate access device account numbers from Chase Credit Card holders resulting in a total fraud loss of \$231,000.00 during that time period. [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** obtained these numbers through his work at a Holiday Inn Hotel in St. Paul, Minneapolis.

149. On or about September 13, 2010, [26] **HAJI OSMAN SALAD a/k/a**

"HOLLYWOOD" possessed three counterfeit credit cards.

150. In 2009 and 2010 [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"** obtained counterfeit and unauthorized access devices from [26] **HAJI OSMAN SALAD a/k/a "HOLLYWOOD"**.

All in violation of Title 18, United States Code, Section 1029(b)(2) and Title 18, United States Code, Section 2.

COUNT NINETEEN

The Grand Jury Further Charges:

151. From on about March 28, 2010, through in or about March 29, 2010, in the Middle District of Tennessee and elsewhere, [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"**, [22] **ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY"**, and [28] **AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL"** did combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to knowingly corruptly persuade another person, or attempt to do so, to alter, destroy, mutilate, or conceal an object with the intent to impair the object's integrity and availability for use in an official proceeding and with intent to hinder, delay, and prevent the communication to a law enforcement officer of information relating to the commission or possible commission of a Federal Offense, in violation of Title 18, United States Code, Sections 1512(c)(1) and 1512(b)(3).

BACKGROUND OF THE CONSPIRACY

152. The allegations contained in paragraphs 119 through 144 are hereby re-alleged and incorporated as if fully set forth herein.

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendants committed the following acts:

153. The allegations of Paragraphs 152 through 154 are hereby re-alleged and incorporated as if fully set forth herein.

All in violation of Title 18, United States Code, Section 1512(k) and Title 18, United States Code, Section 2.

COUNT TWENTY

The Grand Jury Further Charges:

154. Between on or about July 7, 2010, and July 14, 2010, in the Middle District of Tennessee, [27] **BIBI AHMED SAID**, did knowingly and corruptly persuade and attempt to persuade another person, with intent to influence the testimony of any person in an official proceeding, to wit a Federal Grand Jury.

In violation of Title 18, United States Code, Section 1512(b)(1).

COUNT TWENTY-ONE

The Grand Jury Further Charges:

155. Between on or about July 7, 2010, and July 14, 2010, in the Middle District of Tennessee [27] **BIBI AHMED SAID**, knowingly did attempt to obstruct, or in any way interfere with or prevent the enforcement of Title 18, United States Code, Section 1591.

In violation of Title 18, United States Code, Section 1591(d).

COUNT TWENTY-TWO

The Grand Jury further charges:

On or about November 17, 2009, in the Middle District of Tennessee, [1] **ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO"**, did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement in that [1] **ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO"** filed, in Nashville, Tennessee, a signed I485 Application to Register Permanent Residence or Adjust Status with the United States Citizenship and Immigration Services. In this document [1] **ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO"** made the following statements:

1. That he had never been arrested, cited, charged, indicted, fined, or imprisoned for breaking or violating any law or ordinance excluding traffic violations.
2. That he had not illicitly trafficked in any controlled substance, or knowingly assisted, abetted, or colluded in the illicit trafficking of any controlled substance.

3. That in the past 10 years he had not procured anyone for prostitution, or intended to engage in such activities in the future.
4. That he had not received public assistance in the United States from any source, including the United States government, or any state, county, city, or municipality (other than emergency medical treatment), and that he was not likely to receive public assistance in the future.

well knowing and believing the following:

1. That he had been convicted on September 28, 2004, in the Common Pleas Court in Lucas County, Ohio, case no. CR04-2052, for Aggravated Possession of Drugs, Felony 5th Degree.
2. That he had been arrested on or about September 26, 1999, in Havre, Montana, by the United States Border Patrol.
3. That in the past 10 years prior to November 17, 2009, he had procured persons for prostitution.
4. That he did receive public assistance from the Metropolitan Development and Housing Agency, Nashville, Tennessee, in the form of Section 8 housing, for the time period of February 7, 2003, through January 27, 2004, based upon an application signed August 31, 2001.

In violation of Title 18, United States Code, Section 1001.

COUNT TWENTY-THREE

The Grand Jury further charges:

On or about August 21, 2009, in the Middle District of Tennessee, [8] **FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE"**, did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, a false writing or document,

knowing the same to contain a materially false, fictitious, and fraudulent statement, in that [8]

FADUMO MOHAMED FARAH a/k/a “NAANA NAANA” a/k/a “GANGSTER BOO” a/k/a “BARNIE”, in Nashville, Tennessee, filed a signed I485 Application to Register Permanent Residence or Adjust Status with United States Citizenship and Immigration Services. In this document [8] **FADUMO MOHAMED FARAH a/k/a “NAANA NAANA” a/k/a “GANGSTER BOO” a/k/a “BARNIE”**, made the following statements:

1. That in the past 10 years she had not procured anyone for prostitution, or intended to engage in such activities in the future.
2. That she had not received public assistance in the United States from any source, including the United States government, or any state, county, city, or municipality (other than emergency medical treatment), and that she was not likely to receive public assistance in the future.

well knowing and believing the following:

1. That in the past 10 years prior to August 21, 2009, she had procured persons for prostitution.
2. That she did receive public assistance from the Metropolitan Development and Housing Agency, Nashville, Tennessee, in the form of Section 8 housing, for the time period of February 7, 2003, through July 2008, based upon an application signed August 31, 2001.

In violation of Title 18, United States Code, Section 1001.

COUNT TWENTY-FOUR

The Grand Jury further charges:

From on or about June 4, 2001, through on or about September 24, 2002, in the Middle District of Tennessee, [15] **DAHIR NOR IBRAHIM a/k/a “DAHIR LUCKY”** did willfully and

knowingly procure or attempt to procure, contrary to law, the naturalization of any person, or documentary or other evidence of naturalization or of citizenship, in that [15] **DAHIR NOR IBRAHIM a/k/a "DAHIR LUCKY"**, caused to be filed and filed, in Nashville, Tennessee, a signed N400 Application For Naturalization with the Immigration and Naturalization Services, now known as the United States Citizenship and Immigration Services. In this document [15] **DAHIR NOR IBRAHIM a/k/a "DAHIR LUCKY"**, made the following statements:

1. That in the past 10 years he had never procured anyone for prostitution.
2. That he had no children.

well knowing and believing the following:

1. That in the past 10 years prior to June 4, 2001, he had procured persons for prostitution.
2. That prior to June 4, 2001, he had one child.

In violation of Title 18, United States Code, Section 1425(a).

FORFEITURE ALLEGATION I

156. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

157. Upon conviction of the offense alleged in Count Eighteen of this indictment, defendants [2] **ABDULLAHI SADE AFYARE a/k/a "FOREHEAD"**, [4] **YAHYA JAMAL AHMED**, [6] **MUSSE AHMED ALI a/k/a "FAT BOY"**, [12] **FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR"**, [13] **ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE"**, [14] **MUHIYADIN HASSAN HUSSEIN a/k/a "CD"**, [18] **ABDIGADIR AHMED KHALIF a/k/a "AWALI"**, [21] **FUAD FAISAL NUR a/k/a "HANJULE"**, [22] **ABDIFATAH SHARIFF**

"SUNDERRA", [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD", [28] AHMED AWEYS SHEIK a/k/a "REAR HAMMER" a/k/a "ABDUL", [29] YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR" shall forfeit to the United States of America:

(a) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property, real or personal, which constitutes, or is derived from, proceeds traceable to an offense constituting a violation of Title 18, United States Code, Sections 1029(b)(2) as charged in Count Eighteen.

158. The property to be forfeited includes, but is not limited to, a money judgment in the amount of at least Two Hundred Thirty-One Thousand Dollars and No Cents (\$231,000), representing the proceeds obtained as a result of the violations of Title 18, United States Code, Section 1029 as charged in Count Eighteen.

If any of the property described above as being subject to forfeiture, as a result of any acts or omissions of the defendant(s):

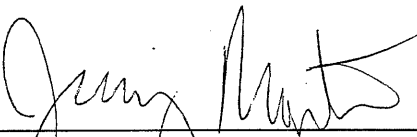
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has substantially diminished in value; or
- (5) has been commingled with other property which cannot be
divided without difficulty;

the United States shall be entitled to forfeiture of substitute property and it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United

States Code, Section 853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeiture property.

A TRUE BILL:

FOREPERSON


JERRY E. MARTIN
UNITED STATES ATTORNEY


VAN S. VINCENT
ASSISTANT UNITED STATES ATTORNEY