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**REDACTED FOR
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

CR-15-707-PHX-SRB (MHB)

United States of America,

Plaintiff,

v.

Abdul Malik Abdul Kareem,
aka Decarus Thomas,

Defendant.

No.

INDICTMENT

VIO: 18 U.S.C. § 371
(Conspiracy)
Count 1

VIO: 18 U.S.C. §§ 924(b) & 2
(Interstate Transportation of Firearms
with Intent to Commit a Felony)
Count 2

VIO: 18 U.S.C. § 1001(a)(2)
(False Statements)
Count 3

THE GRAND JURY CHARGES:

Background

On or about February 11, 2015, the organizers of the Muhammad Art Exhibit and Contest announced that the contest would be held at the Curtis Culwell Center in Garland, Texas, on May 3, 2015. After the announcement but prior to April 23, 2015, ABDUL MALIK ABDUL KAREEM ("KAREEM"), Elton Francis Simpson ("Simpson"), Nadir Hamid Soofi ("Soofi"), and others known and unknown to the grand jury began a plot to disrupt the contest. On the day of the contest, Simpson and Soofi drove toward the Curtis Culwell Center, stopped their car, got out, and began shooting

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1 with assault rifles at security personnel and law enforcement. The security guard was
2 struck by a bullet and injured, and Simpson and Soofi were shot and killed by police
3 officers.

4 **Count 1**

5 Beginning on or about January 7, 2015, and continuing through May 3, 2015, at or
6 near Phoenix, in the District of Arizona, and elsewhere, KAREEM, together with other
7 persons known and unknown to the grand jury, conspired to violate Title 18, United
8 States Code, § 924(b), in that they knowingly and intentionally conspired to transport
9 firearms and ammunition in interstate commerce with the intent to commit crimes
10 punishable by imprisonment exceeding one year and with knowledge and reasonable
11 cause to believe that an offense punishable by imprisonment exceeding one year was to
12 be committed therewith, including murder in violation of Texas Penal Code § 19.02 and
13 aggravated assault in violation of Texas Penal Code §§ 22.01(a) and 22.02(a) & (b).

14 **Overt Acts**

15 In furtherance of the conspiracy and to effect the objects of the conspiracy, the
16 following overt acts, among others, were committed in the District of Arizona:

17 1. On dates between January 7, 2015, and May 3, 2015, KAREEM, Simpson,
18 Soofi, and other persons known and unknown to the grand jury traveled to remote desert
19 areas near Phoenix, Arizona, to practice shooting firearms.

20 2. On dates between January 7, 2015, and May 3, 2015, KAREEM provided
21 firearms to Simpson and Soofi.

22 3. On dates between January 7, 2015, and May 3, 2015, KAREEM hosted
23 Simpson, Soofi, and other persons known and unknown to the grand jury inside his home
24 to discuss the Muhammad Art Exhibit and Contest and their plan to travel from Phoenix,
25 Arizona, to Garland, Texas, to conduct an attack on the contest.

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

Count 2

Beginning on or before May 1, 2015, and continuing through May 3, 2015, at or near Phoenix, in the District of Arizona, and elsewhere, KAREEM did knowingly and intentionally transport firearms and ammunition in interstate commerce with the intent to commit crimes punishable by imprisonment exceeding one year and with knowledge and reasonable cause to believe that an offense punishable by imprisonment exceeding one year was to be committed therewith, that is, murder in violation of Texas Penal Code § 19.02 and aggravated assault in violation of Texas Penal Code §§ 22.01(a) and 22.02(a) & (b).

All in violation of Title 18, United States Code, Sections 924(b) and 2.

Count 3

On or about May 5, 2015, at or near Phoenix, in the District of Arizona, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, KAREEM did knowingly and willfully make false, fraudulent, and fictitious material statements and representations; that is, (1) that he did not go shooting in the desert with Simpson and Soofi before May 3, 2015; (2) that before May 3, 2015, neither Simpson nor Soofi fired the weapons they used in connection with the attack in Garland, Texas; (3) that Simpson and Soofi did not ask him to participate in an attack of any kind on or before May 3, 2015; (4) that he did not know in advance that Simpson and Soofi planned to conduct an attack in Garland, Texas; and (5) that he did not know about an event, that is, the Muhammad Art Exhibit and Contest that was to take place in Garland, Texas, on or about May 3, 2015, until after Simpson and Soofi were killed while

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1 attempting to conduct an attack on the contest.

2 All in violation of Title 18, United States Code, Section 1001(a)(2).

3
4 A TRUE BILL

5 /S/

6 FOREPERSON OF THE GRAND JURY
Date: June 10, 2015

7 JOHN S. LEONARDO
8 United States Attorney
9 District of Arizona

10 /S/

11 Joseph E. Koehler
12 Kristen Brook
Assistant U.S. Attorneys