

SEALED

FILED

United States District Court

MAY 13 2015

NORTHERN DISTRICT OF

CLERK, U.S. DISTRICT COURT

By _____
Deputy

UNITED STATES OF AMERICA

V.

COMPLAINT

BILAL ABOOD

CASE NUMBER: 3-15-MJ- 316

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 14, 2015, in the Dallas Division of the Northern District of Texas, defendant(s) did,

make a materially false, fictitious and fraudulent statement and representation, in a matter within the jurisdiction of the Federal Bureau of Investigation,

in violation of Title 18, United States Code, Section(s) 1001.

I further state that I am a(n) Special Agent with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

See attached Affidavit of Special Agent _____ (FBI) which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No

Signature of Complainant

Special Agent, (FBI)

Sworn to before me and subscribed in my presence, on this 13th day of May, 2015, at Dallas, Texas.

UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

I, _____, a Special Agent with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

AGENT BACKGROUND

I have been a Special Agent with the FBI for over 19 years, and I am currently assigned to the FBI's North Texas Joint Terrorism Task Force (JTTF). I have worked on counterterrorism matters for over two years. As a member of the JTTF, I work closely with agents and task force officers from other federal and local law enforcement agencies on a daily basis.

FOREIGN TERRORIST ORGANIZATIONS

On October 15, 2004, the United States Secretary of State designated Al-Qaida in Iraq (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 entity under section 1(b) of Executive Order 13224.

On December 11, 2012, the Secretary of State amended the Foreign Terrorist Organization (FTO) and Executive Order 13224 designations of AQI to include the following new aliases: al-Nusra Front, Jabhat al-Nusra, Jabehet al-Nusra, The Victory Front, and Al-Nusra Front for the People of the Levant (ANF).

On May 15, 2014, the Secretary of State amended the designation of AQI as a Foreign Terrorist Organization (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, 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. To date, ISIL remains a designated FTO.

In addition, on May 15, 2014, the Secretary of State, in response to the evolving nature of the relationships between ANF and AQI, amended the FTO designation of AQI to remove all aliases associated with al-Nusra Front. Separately, the Secretary of State then designated al-Nusra Front, also known as Jabhat al-Nusra, also known as Jabhet al-Nusra, also known as The Victory Front, also known as Al-Nusra Front for the People of the Levant, also known as Al-Nusra Front in Lebanon, also known as Support Front for the People of the Levant, and also known as Jabaht al-Nusra li-Ahl al-Sham min Mujahedi al-Sham fi Sahat al-Jihad, as a Foreign Terrorist Organization 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. ANF remains designated as an FTO.

BACKGROUND

The FBI is investigating numerous individuals who have traveled or are attempting to travel to Syria in order to involve themselves in the fighting that has

consumed Syria for more than three years. A variety of armed groups are operating in Syria, including groups that are fighting against the Syrian regime led by President Bashar Al Assad. Reports indicate that Assad's regime took violent action against individuals who protested against the regime and the current civil war ensued. The Free Syrian Army (FSA) formed as a secular opposition force to fight the Assad regime. In addition, terrorist groups are fighting in Syria and Iraq, including ISIL (formerly known as AQI) and ANF. The self-proclaimed leader of ISIL is Abu Bakr al-Baghdadi.

FACTS OF THE INVESTIGATION

Bilal Abood is an Iraqi-born naturalized US citizen, who migrated to the United States in 2009. He speaks fluent English and Arabic. On March 29, 2013, Abood attempted to depart the United States at Dallas Fort Worth International Airport (DFW), but was denied boarding on an international flight. At the airport, FBI agents interviewed Abood and asked about his travel plans. Abood stated that he was merely planning to travel to Iraq to visit with family, and that he did not understand why he was prohibited from flying on that date.

On April 4, 2013, in Mesquite, Texas, FBI agents interviewed Abood again. They asked Abood if on March 29, 2013 at DFW airport, he intended to go to Syria to fight, and Abood stated he did not. Later in the interview, Abood admitted that his intent on March 29, 2013, was to go to Syria to fight Assad's regime. Abood claimed he wanted to fight with the FSA.

On or about April 17-19, 2013, the FBI learned that Abood was in San Antonio, Texas, planning to leave the United States to go and fight in Syria. A confidential human source (CHS) reported that Abood was watching Al-Qaida videos on social media, along with videos about the creation of ISIL. The videos referenced ISIL's leader, Abu Bakr al-Baghdadi, and discussed ANF's obedience to orders given by Al-Qaida. Abood told the CHS he wanted to help build the Islamic State of Iraq.

On or about April 29, 2013, Abood left the United States through Mexico and traveled through various countries into Turkey.

On September 16, 2013, upon Abood's return to the United States, the FBI interviewed him. Abood admitted traveling to Syria through Turkey, and claimed he went there to fight with the FSA. He described his trip to Deir Ezzour (Syria), and he claimed to have stayed in an FSA camp, but also claimed that the FSA and ANF actively collaborated in achieving objectives, exchanging equipment, and committing attacks. Abood said he became frustrated with a lack of action, and he wanted to return to the United States. Abood denied ever providing financial support to ANF, ISIL or any other terrorist organization.

A search warrant was conducted on Abood's computers on July 9, 2014. A review of Abood's computer revealed Abood pledged an oath to Abu Bakr al-Baghdadi, the leader of ISIL, on June 19, 2014. The search warrant also revealed Abood had been on the internet viewing ISIS atrocities such as beheadings, and using his twitter account to tweet and retweet information on al-Baghdadi. On June 19, 2014, using ibn alislaam @

albaghdady_1978@hotmail.com, Abood tweeted, "I pledge obedience to the Caliphate Abu Bakr al-Baghdadi. Here we renew our pledge to the Caliphate Abu Bakr al-Baghdadi come on supporter where is the pledger." That post was retweeted by others. The twitter account also revealed a tweet by Abood on July 1, 2014, wherein he stated, "Advice from Sheikh al-Hatari to the Elders of Al-Qaida - God save them..."

On April 14, 2015, FBI agents went to Abood's residence in order to return his computer that was seized in the 2014 search warrant. Abood admitted to the agents knowing that it was a crime to lie to an FBI agent, and Abood denied to the agents that he had ever pledged allegiance to Abu Bakr al-Baghdadi.

CONCLUSION

Based on the foregoing facts and circumstances, there is probable cause to believe that on April 14, 2015, Bilal Abood, did knowingly and willfully make and cause to be made materially false, fictitious and fraudulent statements and representations in a matter within the jurisdiction of the Federal Bureau of Investigation, that is a counter-terrorism investigation, by falsely stating to federal law enforcement agents that he had never pledged allegiance to Abu Bakr al-Baghdadi (the leader of ISIL), in violation of 18 U.S.C. §1001.

Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 3rd DAY OF MAY, 2015.

~~UNITED STATES MAGISTRATE JUDGE~~
UNITED STATES MAGISTRATE JUDGE