

Attachment A

1. In or about February 2018, ALAM was introduced to an undercover law enforcement officer (“UC-0”) after New York City Police Department (“NYPD”) officers reviewed ALAM’s Facebook profile, which contained links to other Facebook pages that the NYPD officers believed espoused public support of terrorist organizations.

2. On or about April 6, 2018, ALAM met with UC-0 and discussed ALAM’s interest in gun ownership and signing up for the U.S. Army Reserves or National Guard. During the conversation, ALAM stated: “As I was telling you I’m just gonna turn on my own men (Laughing).” UC-0 also asked ALAM “What can you plan something huge like though?” ALAM responded: “I don’t know, from the like place bombs (UI),” and UC-0 added: “Or (UI) place bombs in the entire base . . . nice I like that.” ALAM responded “Then blow it up simultaneously” and “That would be hilarious.”

3. On or about August 5, 2018, ALAM met with UC-0 and stated that he wanted “Muslims” to build a “Khalifa[h], a strong Islamic State.”

4. On August 19, 2018, ALAM and UC-0 discussed UC-0’s purported impending travel to Pakistan, which UC-0 said was “just” to “see my parents.” ALAM stated, “I wish I could go.” ALAM asked UC-0 if he was serious about “join[ing] the dawlah” when UC-0 was overseas. ALAM stated that, if UC-0 joined “the dawlah,” then ALAM would have “a direct connection” and that “maybe it’ll be easier for me to go down there, you know.”

5. On or about September 6, 2018, ALAM and UC-0 met with another undercover law enforcement officer (“UC-1”). After UC-1 asked ALAM what his dream was, ALAM replied “I want to put the flag of the Khalifah on the Empire State Building” and said that he would die for New York City to be “our capitol in the East.”

6. On or about September 11, 2018, ALAM met with UC-1. During their meeting, ALAM discussed deceased al-Qaeda leader Usama Bin Laden and the terrorist attacks in the United States on September 11, 2001. In response to questions by UC-1 about whether Bin Laden was successful in his mission, ALAM stated that Bin Laden’s “mission is a complete success, thousands of American soldiers died and trillions of their monies gone in the war.” In response to UC-1 asking if Bin Laden was successful in establishing a Khalifah, ALAM stated that “it was the duty of Muslims, you know, to make the khalifa.”

7. On or about September 15, 2018, ALAM met with UC-1 and again spoke about Bin Laden. When UC-1 inquired if anyone could replace Bin Laden, ALAM stated “yeah . . . he did his job[.] He did what he is supposed to do. Now it’s up to us.”

8. On or about September 27, 2018, ALAM and UC-1 met and discussed the use of suicide vests. ALAM stated that they had “two options” to use the suicide vest:

either in an attack in New York City in Times Square during a big festival, or in an attack in Washington, D.C. to kill then-President Donald J. Trump.

9. On or about December 6, 2018, ALAM met with UC-1 and discussed carrying out an attack in New York City. UC-1 said, “when I first met you, you were so eager about those ideas, but now you like – took a step back.” ALAM said, “Not a step back. It is just – good ideas but no means, you know . . . like, it is too hard to do them.” When UC-1 asked ALAM what types of resources were needed, ALAM stated that they needed to obtain bomb-making materials, including means to detonate a suicide vest. ALAM also said that they would need “little circles, balls and . . . when it blows up those balls explode and the metal sprays everywhere. The more better the explosives, the more farther the shrapnel could go.” At one point during the meeting, ALAM borrowed UC-1’s cellular telephone to search for and then listen to speeches by Anwar al-Awlaki. Later in the meeting, when UC-1 asked what ALAM would do with a big gun if he had one, ALAM replied that he would use it to shoot at police officers “if they come at us.”

10. On or about January 4, 2019, ALAM met with UC-1. At UC-1’s suggestion, UC-1 and ALAM agreed to conduct a “recon,” meaning reconnaissance, of Times Square. UC-1 and ALAM then traveled together to Times Square. When they arrived, ALAM used his cellular telephone to make a video recording of the area. ALAM explained to UC-1 that he was looking for potential targets. UC-1 thereafter asked ALAM what next steps they would take. ALAM responded that they “would have to become ready. Like in a war, you know. You make the plans, you do the recon.” Additionally, while in Times Square, ALAM asked UC-1: “This side is more important, right?” UC-1 responded “Hmm,” and ALAM then said: “Definite, this side is definitely more important.”

11. On or about January 16, 2019, ALAM and UC-1 traveled to a shooting range in Pennsylvania. While driving to the range, ALAM stated, “I want to die fighting man.” UC-1 asked ALAM “So, what’s, what’s. How do you want to die? What’s the way you envision yourself dying?” ALAM replied “I want to die fighting for (UI)” to which UC-1 replied “Of course.” UC-1 then said “al Dowlah? Is that what you said?” ALAM replied “Yeah.” Once they arrived at the range, ALAM and UC-1 received a shooting lesson from an employee of the range. Afterwards, ALAM stated to UC-1, “damn, I want to carry that gun so badly, all the time.” While driving home from the range, that same day, ALAM and UC-1 discussed purchasing firearms from an associate of UC-1. ALAM stated that making such a purchase was a huge risk, but not a bad idea if they could avoid being arrested by not carrying the firearm on their person all the time. ALAM stated that he hoped UC-1’s associate was not a police officer. ALAM informed UC-1 that he was “willing to pay like \$500.”

12. On or about January 21, 2019, ALAM met with UC-1. During the meeting, ALAM suggested they do another “recon” of Times Square, stating, “So let’s hit it bro, our project, Times Square.” While in Times Square on or about January 21, 2019, ALAM pointed to an area within Times Square where there were crowds of people, and stated, “most of the people are there you know, it makes more impact.”

13. On or about March 14, 2019, ALAM met with UC-1. While driving on the Westside Highway in Manhattan in UC-1's vehicle, ALAM pointed to a building and asked, "Is that the World Trade Center?" When UC-1 responded affirmatively, ALAM stated, "More for us to break." When UC-1 asked how ALAM would conduct such an attack on the World Trade Center, ALAM replied, "probably a rocket launcher, like a huge one." UC-1 then asked how ALAM would conduct an attack with "the tools we have today." ALAM replied in a whisper, "Available tools, probably a bomb."

14. On or about March 21, 2019, ALAM met with UC-1. During this meeting, UC-1 asked what would make ALAM happy. ALAM replied "seeing the flag of Islam on the Twin Towers or the Empire State Building." ALAM reminded UC-1 that ALAM wanted to purchase a firearm.

15. On or about April 11, 2019, ALAM met with UC-1 and discussed purchasing firearms from an "associate" of UC-1. UC-1 asked ALAM "Do you want me to call him?" and ALAM responded "No" and "Set up a meeting or whatever. Let's discuss the price. I mean, the- is he gonna buy after we discuss the price or does he already have them? Ask him that at least." UC-1 responded "I think- I think- I don't know. Let's- let's call him," and ALAM responded "Alright." UC-1 then called the "associate," who was another undercover officer ("UC-2") purporting to be a firearms dealer, on a speaker phone as ALAM listened. During the call, UC-2 agreed to meet with ALAM and UC-1 to discuss a firearms purchase.

16. Later that same day, ALAM and UC-1 met with UC-2. During the meeting, ALAM told UC-2 that ALAM wanted to buy two Glock G19 semi-automatic pistols. ALAM later repeated that he wanted to purchase two Glock G19 semi-automatic pistols and that he was prepared to pay \$2,000 in total for both of them.

17. On or about April 25, 2019, ALAM and UC-1 traveled to a shooting range in Pennsylvania. While driving to the range, ALAM told UC-1 that ALAM had a Lasik eye surgery appointment on May 10, 2019, and asked for help driving to and from the appointment. When UC-1 asked ALAM why he was taking the risk, ALAM replied: "Let's say we are in an attack, right, say that my glasses fall off. What if I accidentally shoot you? You know what I mean. Imagine what the news channel would call me [laughing] the 'Looney Tunes Terrorist' who killed his own man [laughing] or the 'Blind Terrorist' [laughing]." UC-1 then asked whether ALAM and UC-1 would use a "gun" during an attack, to which ALAM stated that ALAM would potentially use a gun after first throwing the "bombs," referring to grenades.

18. On or about May 2, 2019, ALAM met with UC-1. During the meeting, ALAM asked "Your old friend, did he got back to you?" and UC-1 replied "Oh, [UC-2]?" ALAM said "Yeah, yeah, yeah." UC-1 then told ALAM that UC-1 had met UC-2 at UC-2's store, and UC-2 had explained to UC-1 that he had "told the guy [UC-3] of our

concern.” UC-1 also said that he was told by UC-2 that UC-3 was “going to get us stuff with the serial numbers scratched off.” ALAM replied, “Oh, that’s good, man.”

19. On or about May 9, 2019, ALAM met with UC-1 at UC-1’s apartment in Brooklyn. While waiting on the arrival of UC-2, ALAM told UC-1 that ALAM hoped the police did not come through the front door of the apartment. After UC-2 and another purported arms dealer (“UC-3”) arrived at the apartment, UC-2 opened a suitcase containing firearms, including handguns and an Avtomat Kalashnikova (“AK-47”) assault rifle, as well as hand grenades. UC-2 and UC-3 explained that all of the firearms had their serial numbers scratched off. ALAM asked if he could hold the Glock G19 semi-automatic pistol that UC-2 and UC-3 had brought with them. ALAM further inquired about the AK-47 and asked UC-3 whether it was a fully automatic rifle, and UC-3 confirmed that the AK-47 was fully automatic. Further, ALAM, after observing the grenades, stated that they “look like Russian-made grenades.”

20. After UC-2 and UC-3 left the apartment, ALAM stated, “Damn man, he’s rocking an AK” and asked UC-1 if UC-1 wanted an AK-47. ALAM told UC-1 that they should buy only one AK-47, because two would be too expensive. Later in the conversation, UC-1 asked ALAM how ALAM would use the AK-47. ALAM explained that the AK-47 could be useful as part of a suicide vest attack. ALAM also told UC-1 that grenades could do significant damage and that they could buy grenades if they were unable to find explosives. ALAM explained that a grenade could “take out at least eight people” if it were to explode indoors, such as in a mall, or in a large gathering. At the end of the conversation, ALAM told UC-1 that ALAM first wanted to buy the two Glock pistols. ALAM further stated, “Damn bro, I’m happy.” UC-1 asked, “Why?” ALAM responded, “You know . . . the guns . . . progress.”

21. On or about May 29, 2019, ALAM met with UC-1. During that meeting, ALAM told UC-1 that, after they purchased the two Glock pistols, ALAM wanted to buy a grenade. When UC-1 asked ALAM if they should order grenades from UC-2, ALAM told UC-1 that they should first buy the pistols and allow UC-2 to get comfortable with ALAM and UC-1. UC-1 then called UC-2 on a speaker phone as ALAM listened. During the call, UC-2 said that UC-3 would meet ALAM, UC-1 and UC-2 at UC-1’s apartment in Brooklyn the following week to sell the two Glock pistols to ALAM and UC-1. When UC-2 asked ALAM and UC-1 if they wanted to buy anything else, ALAM stated, “For now we are satisfied but later on we are going to ask for some other stuff.”

22. On or about June 6, 2019, ALAM and UC-1 met and traveled to UC-1’s apartment in Brooklyn. While traveling to UC-1’s apartment, UC-1 asked ALAM if he was “ready for this. Are you sure you want to do this?” ALAM replied, “Yeah, yeah, of course.” Later in the conversation, ALAM told UC-1 that he wanted to obtain a New York State enhanced driver license. When UC-1 asked ALAM why he wanted an enhanced driver license, ALAM told UC-1 that an enhanced driver license would allow ALAM to “walk on to a military base” so that he could “blow it up.”

23. After arriving at UC-1's apartment, ALAM and UC-1 met UC-2 and UC-3. During that meeting, UC-3 told ALAM and UC-1 that the price for each of the Glock 19 pistols was \$400 and that UC-3 included a box of ammunition for free. ALAM immediately responded "thanks a lot for the ammo" and asked UC-3 about the model of the Glock 19 pistols. UC-2 then showed ALAM and UC-1 that each of the firearms had the serial numbers scratched off. ALAM asked about the process used to scratch off the serial numbers. ALAM and UC-1 then each paid \$400 to UC-3 for the two Glock 19 pistols. ALAM provided \$400 towards the purchase, all in \$100 bills. Shortly thereafter, UC-3 asked ALAM if ALAM had any questions. ALAM asked UC-3 whether ALAM could buy a silencer from UC-3. ALAM also asked UC-3 whether the Glock 19 pistol that he just purchased was compatible with a silencer.

24. ALAM and UC-1 each took possession of the Glock 19 pistols, with the serial numbers scratched off, that they had purchased for \$400 each. ALAM was subsequently placed under arrest.