

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Property of Elvin Hunter Bgorn Williams

Case No. MJ21-357

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachments A-1, A-2, and A-3 incorporated by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachments B-1, B-2, and B-3 incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- checked evidence of a crime;
unchecked contraband, fruits of crime, or other items illegally possessed;
checked property designed for use, intended for use, or used in committing a crime;
unchecked a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section 18 U.S.C. § 2339B
Offense Description Providing Material Support to Designated Foreign Terrorist Organization

The application is based on these facts:

checked See Affidavit of FBI Special Agent David Narrance continued on the attached sheet.

unchecked Delayed notice of days (give exact ending date if more than 30 days: is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: checked by reliable electronic means; or: unchecked telephonically recorded.

David Narrance
Applicant's signature

David Narrance, FBI Special Agent
Printed name and title

- unchecked The foregoing affidavit was sworn to before me and signed in my presence, or
checked The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 06/15/2021

Brian A. Tsuchida
Judge's signature

Judge's signature

City and state: Seattle, Washington

Brian A. Tsuchida, Chief United States Magistrate Judge
Printed name and title

ATTACHMENT A-1
Property to be Searched

The property to be searched includes the following:

- A Samsung smartphone with IMEI 351675644645206, recovered from Elvin Hunter Bgorn Williams' person on May 28, 2021, currently located at the Federal Bureau of Investigation in Seattle.

- Downloaded digital image of the contents of a Samsung smartphone, Model SM-G965U Galaxy S9+, with MSISIDN 12064808179, obtained on November 7, 2020, currently located on a hard drive at the Federal Bureau of Investigation in Seattle.

ATTACHMENT B-1
Property to be Seized

Records (in whatever form) relating to violations of Providing Material Support to a Foreign Terrorist Organization, 18 USC § 2339B, that is:

Cellular telephones and other communications devices including smartphones may be searched for any and all evidence of the crime listed above in whatever form, including:

- a. evidence of who used, owned, or controlled the device;
- b. passwords, encryption keys, and other access codes that may be necessary to access the device or to access communication and financial accounts associated with the device;
- c. communications made in furtherance of the crime enumerated above;
- d. evidence indicating the user’s state of mind as it relates to the crime enumerated above, including but not limited to any and all items related to the terrorist group known as ISIS and/or any other terrorist organization;
- e. evidence indicating how and when the subject device was accessed or used, to determine the geographic and chronological context of device access and use, in relation to the crime under investigation and to the device user;
- f. evidence of the identities of and relationships between co-conspirators;
- and
- g. photographic or video images related to the crime enumerated above.

ATTACHMENT A-2

Accounts to be Searched

This warrant applies to information associated with the Instagram accounts with the following UIDs:

- 37064444703
- 44445557787
- 41106672127
- 44537412339
- 45180486908
- 47290408094
- 46134884165
- 45403995539
- 44513741393
- 29697292335
- 44006863484
- 41106672127
- 32163375236
- 21679570348
- 38546492718
- 31535539805
- 29822766132

("the SUBJECT ACCOUNTS"), that are stored at premises owned, maintained, controlled, or operated by Facebook, Inc., a company headquartered at 1601 Willow Road, Menlo Park, California.

ATTACHMENT B-2

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment A-2 is within the possession, custody, or control of Facebook, regardless of whether such information is located within or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to Facebook, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each account or identifier listed in Attachment A-2:

- A. All business records and subscriber information, in any form kept, pertaining to the Accounts, including:
 - 1. Identity and contact information (past and current), including full name, e-mail addresses, physical address, date of birth, phone numbers, gender, hometown, occupation, websites, and other personal identifiers;
 - 2. All Instagram usernames (past and current) and the date and time each username was active, all associated Instagram and Facebook accounts (including those linked by machine cookie), and all records or other information about connections with Facebook, third-party websites, and mobile apps (whether active, expired, or removed);
 - 3. Length of service (including start date), types of services utilized, purchases, and means and sources of payment (including any credit card or bank account number) and billing records;
 - 4. Devices used to login to or access the account, including all device identifiers, attributes, user agent strings, and information about networks and connections, cookies, operating systems, and apps and web browsers;
 - 5. All advertising information, including advertising IDs, ad activity, and ad topic preferences;
 - 6. Internet Protocol (“IP”) addresses used to create, login, and use the account, including associated dates, times, and port numbers, from the date of inception through May 28, 2021;
 - 7. Privacy and account settings, including change history; and

1 8. Communications between Facebook and any person regarding the
2 account, including contacts with support services and records of actions
3 taken;

4 B. All content (whether created, uploaded, or shared by or with the Account),
5 records, and other information relating to videos (including live videos and
6 videos on IGTV), images, stories and archived stories, past and current bios
7 and profiles, posts and archived posts, captions, tags, nametags, comments,
8 mentions, likes, follows, followed hashtags, shares, invitations, and all
9 associated logs and metadata, from the date of inception through May 28,
10 2021;

11 C. All content, records, and other information relating to communications sent
12 from or received by the Account from the date of inception through May 28,
13 2021, including but not limited to:

14 1. The content of all communications sent from or received by the
15 Account, including direct and group messages, and all associated
16 multimedia and metadata, including deleted and draft content if
17 available;

18 2. All records and other information about direct, group, and disappearing
19 messages sent from or received by the Account, including dates and
20 times, methods, sources and destinations (including usernames and
21 account numbers), and status (such as delivered, opened, replayed,
22 screenshot);

23 3. All records and other information about group conversations and video
24 chats, including dates and times, durations, invitations, and participants
25 (including usernames, account numbers, and date and time of entry and
26 exit); and

27 4. All associated logs and metadata;

28 D. All content, records, and other information relating to all other interactions
between the Account and other Instagram users from the date of inception
through May 28, 2021, including but not limited to:

1. Interactions by other Instagram users with the Account or its content,
including posts, comments, likes, tags, follows (including unfollows,
approved and denied follow requests, and blocks and unblocks), shares,
invitations, and mentions;

- 2. All users the account has followed (including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the account;
- 3. All contacts and related sync information; and
- 4. All associated logs and metadata;
- E. All records of searches performed by the account from the date of inception through May 28, 2021; and
- F. All location information, including location history, login activity, information geotags, and related metadata, from the date of inception through May 28, 2021.

Facebook is hereby ordered to disclose the above information to the government within 14 days of issuance of this warrant.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Section 2339B (Providing Material Support to a Foreign Terrorist Organization), including, for each account or identifier listed on Attachment A-2, information pertaining to the following matters:

- a. Posts, videos, or messages relating to the enumerated crime, the terrorist organization known as ISIS, and any other terrorist organization;
- b. Evidence indicating state of mind and motive as it relates to the crime enumerated above;
- c. IP log evidence, including all records of the IP addresses that logged into the accounts, and the dates and times such logins occurred;
- d. Evidence of the identities of and relationships between co-conspirators;
- e. Evidence of who uses or accesses the subject accounts or who exercises in any way any dominion or control over the account;

1 f. Evidence of who communicated with the subject accounts about the crime
2 enumerated above and other matters related to the terrorist group ISIS and/or any other
3 terrorist organizations, including records about their identities and whereabouts;

4 g. Log records, including IP address captures, associated with the specified
5 accounts;

6 h. Subscriber records associated with the specified accounts, including 1) names,
7 email addresses, and screen names; 2) physical addresses; 3) records of session times and
8 durations; 4) length of service (including start date) and types of services utilized; 5)
9 telephone or instrument number or other subscriber number or identity, including any
10 temporarily assigned network address such as internet protocol address, media access card
11 addresses, or any other unique device identifiers recorded by Google in relation to the
12 accounts; 6) account log files (login IP address, account activation IP addresses, and IP
13 address history); 7) detailed billing records/logs; 8) means and source of payment; and 9)
14 lists of all related accounts;

15 i. Records of communications between Facebook and any person purporting to
16 be the account holder about issues relating to the accounts, such as technical problems,
17 billing inquiries, or complaints from other users about the specified account, including
18 records of contacts between the subscriber and the provider's support services, as well as
19 records of any actions taken by the provider or subscriber as a result of the communications;
20 and

21 j. Information identifying accounts that are linked or associated with the subject
22 accounts.

23 This warrant authorizes a review of electronically stored information,
24 communications, other records and information disclosed pursuant to this warrant in order to
25 locate evidence, fruits, and instrumentalities described in this warrant. The review of this
26 electronic data may be conducted by any government personnel assisting in the investigation,
27 who may include, in addition to law enforcement officers and agents, attorneys for the
28 government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI

1 | may deliver a complete copy of the disclosed electronic data to the custody and control of
2 | attorneys for the government and their support staff for their independent review.

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ATTACHMENT A-3
Property to be Searched

The property to be searched is a brown and tan backpack with a camouflage print design, recovered from Elvin Hunter Bgorn Williams on May 28, 2021, currently located at the Federal Bureau of Investigation in Seattle.

ATTACHMENT B-3
Property to be Seized

Records (in whatever form) relating to violations of Providing Material Support to a Foreign Terrorist Organization, 18 USC § 2339B, including:

1. Clothing, including military fatigues, camouflage items, and similar items.
2. Items of personal property that tend to identify the person(s) in control or ownership of the property, including canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys.
3. Evidence indicating state of mind and motive as it relates to the crime enumerated above, including but not limited to any and all items related to the terrorist group known as ISIS and/or any other terrorist organization.
4. Cellular telephones and other communications devices including smartphones may be searched for any and all evidence of the crime listed above in whatever form, including:
 - a. evidence of who used, owned, or controlled the device;
 - b. passwords, encryption keys, and other access codes that may be necessary to access the device or to access communication and financial accounts associated with the device;
 - c. communications made in furtherance of the crime enumerated above;
 - d. evidence indicating the user's state of mind as it relates to the crime enumerated above, including but not limited to any and all items related to the terrorist group known as ISIS and/or any other terrorist organization;
 - e. evidence indicating how and when the subject device was accessed or used, to determine the geographic and chronological context of device access and use, in relation to the crime under investigation and to the device user;
 - f. evidence of the identities of and relationships between co-conspirators; and
 - g. photographic or video images related to the crime enumerated above.

AFFIDAVIT

STATE OF WASHINGTON)
) ss
COUNTY OF KING)

I, DAVID NARRANCE, a Special Agent with the Federal Bureau of Investigation (“FBI”), Seattle, Washington, having been duly sworn, state as follows:

AFFIANT BACKGROUND

I, David Narrance, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have been a Special Agent with the FBI since August 2014. I am presently assigned to the FBI Seattle Joint Terrorism Task Force (“JTTF”). I have received training regarding investigating terrorism related offenses and other national security matters. During my career, I have participated in numerous investigations of individuals who were involved in terrorist related activities and motivated by extremist ideologies. Prior to joining the FBI, I worked for eight years as a federal agent for the United States Border Patrol.

The facts in this affidavit come from my training and experience, and information obtained from other agents, law enforcement officers, intelligence analysts, and witnesses. This affidavit is made for the purpose of establishing probable cause for this search warrant and thus does not include each and every fact known to me concerning this investigation.

PURPOSE OF AFFIDAVIT

This affidavit is made in support of an application for a federal search warrant to search the following:

A Samsung smartphone with IMEI 351675644645206, recovered from Elvin Hunter Bgorn Williams’ person on May 28, 2021, currently located at the FBI in Seattle (described in Attachment A-1);

A brown and tan backpack with a camouflage print design, recovered from Elvin Hunter Bgorn Williams on May 28, 2021, currently located at the FBI in Seattle (described in Attachment A-3);

1 A downloaded digital image of the contents of a Samsung smartphone,
2 Model SM-G965U Galaxy S9+, with MSISDN 12064808179, obtained on
3 November 7, 2020, currently located on a hard drive at the FBI in Seattle
(described in Attachment A-1); and

4 Instagram accounts with the UID:

- 5 • 37064444703
- 6 • 44445557787
- 7 • 41106672127
- 8 • 44537412339
- 9 • 45180486908
- 10 • 47290408094
- 11 • 46134884165
- 12 • 45403995539
- 13 • 44513741393
- 14 • 29697292335
- 15 • 44006863484
- 16 • 41106672127
- 17 • 32163375236
- 18 • 21679570348
- 19 • 38546492718
- 20 • 31535539805
- 21 • 29822766132

22 (hereafter referenced as “SUBJECT ACCOUNTS”), stored at premises
23 owned, maintained, controlled, or operated by Facebook, Inc., an electronic
24 communications service and/or remote computing service provider
25 headquartered in Menlo Park, California. The information to be searched is
26 described in Attachment A-2. This affidavit is made in support of an
27 application for a search warrant under Federal Rule of Procedure 41 and
28 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), to require
Facebook to disclose to the government copies of the information
(including the content of communications) further described in Section I of
Attachment B-2. Upon receipt of the information described in Section I of
Attachment B-2, government-authorized persons will review the
information to locate items described in Section II of Attachment B-2.

1 SUMMARY OF PROBABLE CAUSE

2 On May 28, 2021, I executed an affidavit in support of a Criminal Complaint in
3 the matter of *United States v. Elvin Hunter Bgorn Williams*, MJ21-322. The Criminal
4 Complaint is attached hereto as Exhibit 1 and is hereby adopted and incorporated as if set
5 forth fully herein.

6 **A. Samsung smartphone seized from Williams on May 28, 2021.**

7 As set forth in the Complaint, Williams was arrested at Sea-Tac International
8 Airport at approximately 1:00 p.m. on May 28, 2021, as he attempted to board a flight to
9 Cairo, Egypt. See Complaint at Page 35. The arresting officers and agents recovered a
10 Samsung smartphone (with IMEI 351675644645206) from a pocket of the clothes
11 Williams was wearing. The smartphone is further described in Attachment A-1.

12 **B. Backpack Seized from Williams on May 28, 2021.**

13 When Williams was arrested on May 28, 2021, he was carrying a brown and tan
14 backpack with a camouflage print design, as further described in Attachment A-3.
15 Williams did not have any checked luggage. As a result, this backpack contained all the
16 items Williams was bringing with him to Egypt.

17 Based on information provided by CHS-2, this backpack is believed to contain,
18 among other things, a second smartphone device that Williams had in his possession. As
19 described in the Complaint, Williams was under the belief that CHS-2 was travelling with
20 him to Egypt. Williams and CHS-2 spent the night prior to their flight at a motel.
21 According to CHS-2, Williams had two smartphones in his possession at the motel. The
22 first was the Samsung smartphone that later was seized from one of Williams' pockets
23 upon his arrest, as described above. CHS-2 observed Williams put the second
24 smartphone into his backpack as they left the motel for the airport on the morning of
25 May 28, 2021. CHS-2 believes that the second smartphone remained in the backpack at
26 the time of Williams' arrest.

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1 **C. Samsung smartphone downloaded on November 7, 2020.**

2 As described in the Complaint, in November 2020, a concerned citizen
3 approached the FBI on behalf of a Seattle area mosque. The citizen reported that
4 members of the mosque had been looking after Williams for over a year as an act of
5 charity – encouraging Williams to de-radicalize, assisting him with a place to live, with
6 food, and with tuition for a semester of college. Members of the mosque also provided
7 Williams with a smartphone and a laptop computer, in hopes that they would assist
8 Williams with a job search. The mosque members made clear to Williams that he would
9 be required to abandon ISIS if he wanted to accept the mosque’s help.

10 When the concerned citizen later observed Williams using the phone to view ISIS
11 videos and engage in online chats with like-minded radical individuals, the concerned
12 citizen directed Williams to return the phone that had been provided to him. Members of
13 the mosque reviewed the phone and were disturbed to find numerous ISIS-related videos
14 that depicted scenes of graphic violence (including summary executions and beheadings
15 by ISIS militants); other ISIS military propaganda; and a video on how to manufacture
16 explosives, which Williams appeared to have distributed to others. The concerned citizen
17 also examined an encrypted messaging app on the phone and found that Williams had
18 accessed numerous ISIS videos.¹ *See* Complaint at Pages 4-5.

19 When the concerned citizen contacted the FBI as described above, he provided
20 agents with consent to view the contents of the phone and reviewed the phone along with
21 the agents. The phone was a Samsung smartphone, Model SM-G965U Galaxy S9+ with
22 MSISIDN 12064808179. The concerned citizen additionally provided consent for the
23 FBI to make a digital image of the contents of the phone and to review the contents of the
24 image. On November 7, 2020, the FBI used Cellebrite software to make a digital image
25 of the contents of the Samsung smartphone. That digital image is currently located on a
26

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28 ¹ The concerned citizen described above subsequently became an FBI CHS, hereafter referred to as “CHS-1.”
CHS-1 has declined any compensation for CHS-1’s work.

1 hard drive at the Federal Bureau of Investigation in Seattle, as further described in
2 Attachment A-1.²

3 As set forth in the Complaint, the concerned citizen and other members of the
4 mosque ultimately returned the phone to Williams at his request because Williams said
5 that he needed a phone to facilitate a job interview. *See* Complaint at page 5.

6 **D. The Instagram Accounts Used by Williams.**

7 During this investigation, the FBI has identified 17 Instagram accounts that
8 Williams has used. Those accounts, collectively referred to as the SUBJECT
9 ACCOUNTS, are listed above and in Attachment A-2. Specific information relating to
10 each of the accounts is set forth below.

11 **37064444703**

12 Williams used this account, with vanity name “ar_rusi_al_assad,” to send
13 communications related to the offense under investigation. *See* Complaint at Page 12,
14 lines 11-12 (“I will be martyred.”); Page 13, lines 9-15 (*i.e.*, “I am getting [a] passport to
15 leave this disgusting land. Before I do my [ISIS application] must be approved and then I
16 shall leave once they are.”).

17 On February 17, 2021, Williams sent CHS-2 a text message stating that his prior
18 Instagram account had been deactivated and identifying this “ar_rusi_al_assad” account
19 as his new Instagram account.

20 **44445557787**

21 Williams used this account, with vanity name “thatrussianmuslim,” to send
22 communications related to the offense under investigation. *See* Complaint at Page 7,
23 fn. 4 (asking for and receiving information about how to pledge oath of allegiance to
24 ISIS); Page 7, lines 2-21 (posting video pledging oath of allegiance to ISIS); Page 12,
25 lines 5-8 (“I was going to go and do my jihad in Iraq and Sham but the caliphate lost
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27 ² FBI agents have reviewed some of the downloaded contents of the Samsung phone, pursuant to the consent
28 provided by the concerned citizen. At this point, the FBI plans to conduct a more comprehensive search of the
downloaded contents of the phone. We are seeking this warrant, out of an abundance of caution, to authorize the
search.

1 territory there.”). As noted in the Complaint, Williams is identifiable in the pledge video
2 posted over this account.

3 According to Instagram records, this account uses the profile name of “Ali Ar-
4 Rusi,” a name that Williams used on several of his accounts, including the one that he
5 used to communicate with CHS-4 and CHS-5, the purported ISIS recruiters. Instagram
6 records also list the subscriber’s telephone number as 206-480-8179. On August 6, 2020,
7 Williams was interviewed by FBI agents and provided this same phone number as his
8 telephone number.

9 **41106672127**

10 In November 2020, the concerned citizen (who later became CHS-1) reported to
11 the FBI that Williams used this Instagram account to view and post ISIS propaganda
12 videos, including videos that depicted scenes of graphic violence. *See* Complaint at
13 Page 5, lines 1-6. According to Instagram records, this account also uses the profile
14 name of “Ali Ar-Rusi.”

15 **44537412339**

16 Williams used this account, again with the profile name “Ali Ar-Rusi,” to send
17 communications related to the offense under investigation. *See* Complaint at Page 13,
18 lines 1-7 (“We need to attack a public event one with some degenerate celebrity like the
19 one in 2017 with that whore [name omitted].”; “My options are motor vehicle and the
20 ancient one: fire.”; “Fire spreads fast and can kill many if set in an apartment or place of
21 business but can be thwarted and put out.”; “Idk how to make explosives powerful
22 enough for anything nor do I have the money.”).

23 According to Instagram records, the subscriber information for this account lists a
24 related email account of manoftawhid@gmail.com. Records obtained from Google list
25 phone number 206-480-8179 as connected to this email account. As noted above,
26 Williams previously provided this same phone number to FBI agents on August 6, 2020.

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1 **45180486908**

2 This Instagram account also uses the profile name “Ali Ar-Rusi.” As noted above,
3 Williams used several other accounts with this same profile name to communicate about
4 the offenses under investigation. According to Instagram records, the subscriber listed an
5 email account of thesilentmuwahid@gmail.com. Records obtained from Google indicate
6 that the subscriber to this email address provided a birthdate of November 11, 2000.
7 Williams’ birthdate is November 12, 2000.

8 **46134884165**

9 On March 5, 2021, Williams told CHS-2 that he opened a new Instagram account.
10 Williams identified this account, with vanity name “themuwahidguy,” as his new
11 Instagram account. CHS-2 viewed this account and saw that most of the content focused
12 on ISIS-related violence and killing.

13 According to Instagram records, the subscriber to this account listed an email
14 address of alialmuganae@gmail.com. On February 25, 2021, Williams provided this
15 same email on his application for a U.S. passport.

16 **47290408094**

17 On March 27, 2021, Williams told CHS-2 that he opened a new Instagram
18 account. Williams identified this account, with vanity name “amir_al_aqareeb,” as his
19 new Instagram account.

20 **45403995539**

21 As set forth in the Complaint, during January 2021, Williams communicated with
22 an FBI online covert employee (“OCE-1”) about the offense under investigation. *See*
23 Complaint at Page 8, lines 12-22. On January 13, 2021, Williams told OCE-1 that he
24 opened a new Instagram account and identified this as the new account.

25 According to Instagram records, this account has a profile name of “Ali Ar-Rusi”
26 and the subscriber to this account listed a phone number of 206-591-8171. On January 7,
27 2021, Williams was interviewed by FBI agents and provided this same phone number as
28 an alternate contact number.

1 44513741393 (vanity name “thatrussianmuslim.v4”)
2 29697292335 (vanity name “islamist_enforcer”)
3 44006863484 (vanity name “thatrussianmuslim.v3”)
4 41106672127 (vanity name “thatrussianmuslim.v2”)
5 32163375236 (vanity name “niqabifajr”)
6 21679570348 (vanity name “prideofpersia3”)
7 38546492718 (vanity name “truthoverfalsehood”)
8 31535539805 (vanity name “negro.v3”)
9 29822766132 (vanity name “popularmemesfront”)

10 On January 4, 2021, Instagram provided records to the FBI identifying the above
11 nine accounts as being linked to one of Williams’ other Instagram accounts. Specifically,
12 according to Instagram, these nine accounts are linked to Williams’ account
13 45180486908 (discussed above) by “device, telephone number, email, creator linkage,
14 and/or naming convention.”

15 On August 6, 2020, when interviewed by FBI agents, Williams confirmed that he
16 was the user of one of these accounts – 21679570348 with the vanity name of
17 “prideofpersia3.” FBI personnel viewed this account and observed ISIS-related content
18 posted over the account.

19 **CELLULAR PHONES OR WIRELESS COMMUNICATION DEVICES**

20 Cellphones or “Wireless Communication Devices” includes cellular telephones
21 and other devices such as tablets (e.g. iPads and other similar devices) used for voice and
22 data communication through cellular or Wi-Fi signals. These devices send signals
23 through networks of transmitter/receivers, enabling communication with other wireless
24 devices or traditional “land line” telephones. Many such devices can connect to the
25 Internet and interconnect with other devices such as car entertainment systems or
26 headsets via Wi-Fi, Bluetooth or near field communication (NFC). In addition to
27 enabling voice communications, wireless communication devices offer a broad range of
28 capabilities. These capabilities include: storing names and phone numbers in electronic
“address books” or “contact lists;” sending, receiving, and storing short message service
(SMS) and multi-media messaging service (MMS) text messages and email; taking,

1 sending, receiving, and storing still photographs and moving video; storing and playing
2 back audio files; and storing dates, appointments, and other information on personal
3 calendars.

4 Based upon my training and experience, all of these types of information may be
5 evidence of crimes under investigation. Stored e-mails and text messages not only may
6 contain communications related to crimes, but also help identify the participants in those
7 crimes. Address books and contact lists may help identify co-conspirators. Similarly,
8 photographs on a cellular telephone may help identify co-conspirators, either through his
9 or her own photographs, or through photographs of friends, family, and associates.

10 Digital photographs also often have embedded location data GPS information that
11 identifies where the photo was taken. This location information is helpful because, for
12 example, it can show where co-conspirators meet, where they travel, and where assets
13 might be located. Calendar data may reveal the timing and extent of criminal activity.

14 A cellphone used for cellular voice communication will also typically contain a
15 “call log” or “stored list of recent, received, sent or missed calls” which records the
16 telephone number, date, and time of calls made to and from the phone. The stored list of
17 recent received, missed, and sent calls is important evidence. It identifies telephones
18 recently in contact with the telephone user and may help identify co-conspirators,
19 establish a timeline of events and/or identify who was using the phone at any particular
20 time.

21 In addition, wireless communication devices will typically have an assigned
22 number and identifying serial number such as an ESN, MIN, IMSI, or IMEI number that
23 identifies the particular device on any network. This identifying information may also
24 include the device’s assigned name (as assigned by the user) and network addresses such
25 as assigned IP addresses and MAC addresses. I know based on my training and
26 experience that such information may be important evidence of who used a device, when
27 it was used, and for what purposes it may have been used. This information can be used
28 to obtain toll records and other subscriber records, to identify contacts by this telephone

1 with other telephones, or to identify other telephones used by the same subscriber or
2 purchased as part of a package.

3 Many wireless communication devices including cellular telephones such as
4 iPhones, iPads, Android phones, and other “smart phones” as well as tablet devices such
5 as Apple iPads may also be used to browse and search the Internet. These devices may
6 browse and search the internet using traditional web browsers such as Apple’s Safari
7 browser or Google’s Chrome browser as well as through third-party applications such as
8 Facebook, Twitter and other that also provide the ability to browse and search the
9 Internet. Based on my training and experience, I know that Internet browsing history
10 may include valuable evidence regarding the identity of the user of the device. This
11 evidence may include online user names, account numbers, e-mail accounts, and bank
12 accounts as well as other online services. Internet browsing history may also reveal
13 important evidence about a person’s location and search history. Search history is often
14 valuable evidence that may help reveal a suspect’s intent and plans to commit a crime or
15 efforts to hide evidence of a crime and may also help reveal the identity of the person
16 using the device.

17 Cellphones and other wireless communication devices are also capable of
18 operating a wide variety of communication application or “Apps” that allow a user to
19 communicate with other devices via a variety of communication channels. These
20 additional communication channels include traditional cellular networks, voice over
21 Internet protocol, video conferencing (such as FaceTime and Skype), and wide variety of
22 messaging applications (such as SnapChat, What’sApp, Signal, Telegram, Viber and
23 iMessage). I know based on my training and experience that there are hundreds of
24 different messaging and conferencing applications available for popular cellular
25 telephones and that the capabilities of these applications vary widely for each application.
26 Some applications include end-to-end encryption that may prevent law enforcement from
27 deciphering the communications without access to the device and the ability to “unlock”
28 the device through discovery of the user’s password or other authentication key.

1 Other communication applications transmit communications unencrypted over
2 centralized servers maintained by the service provider and these communications may be
3 obtained from the service provider using appropriate legal process. Other applications
4 facilitate multiple forms of communication including text, voice, and video conferencing.
5 Information from these communication apps may constitute evidence of crimes under
6 investigation to the extent they may reveal communications related to the crime or
7 evidence of who the user of the device was communicating with and when those
8 communications occurred. Information from these communication apps may also reveal
9 alias names used by the device owner that may also lead to the other evidence.

10 I know based on my training and experience that obtaining a list of all the
11 applications present on a smartphone may provide valuable leads in an investigation. By
12 determining what applications are present on a device, an investigator may conduct
13 follow-up investigation including obtaining subscriber records and logs to determine
14 whether the device owner or operator has used each particular messaging application.
15 This information may be used to support additional search warrants or other legal process
16 to capture those communications and discover valuable evidence.

17 Cellphones and other wireless communication devices may also contain
18 geolocation information documenting where the device was at particular times. Many of
19 these devices track and store GPS and cell-site location data to provide enhanced location
20 based services, serve location-targeted advertising, search results, and other content.
21 Numerous applications available for wireless communication devices collect and store
22 location data. For example, when location services are enabled on a handheld mobile
23 device, many photo applications will embed location data with each photograph taken
24 and stored on the device. Mapping applications such as Google Maps may store location
25 data including lists of locations the user has entered into the application. Location
26 information may constitute evidence of the crimes under investigation because that
27 information may reveal whether a suspect was at or near the scene of a crime at any given
28 moment and may also reveal evidence related to the identity of the user of the device.

1 Based on my training and experience, and research, I know that cellular phones,
2 such as certain phones marketed by LG and Prestigio, have “Smart Phones” capabilities
3 that allow it to function as a wireless telephones, digital camera, portable media player,
4 GPS navigation device, and “PDA.” In my training and experience, examining data
5 stored on devices of this type can uncover, among other things, evidence that reveals or
6 suggests who possessed or used the device. In my training and experience, smart phones
7 can act as mini-computers in that they have many of the functionalities of traditional
8 computers.

9 Searching a cellular phone or wireless communication device is frequently
10 different than conducting a search of a traditional computer. Agents and forensic
11 examiners will attempt to extract the contents of the cellular phone or wireless
12 communication device using a variety of techniques designed to accurately capture the
13 data in a forensically sound manner in order to make data available to search of items
14 authorized by the search warrant. This may involve extracting a bit-for-bit copy of the
15 contents of the device or, if such an extraction is not feasible for any particular device,
16 the search may involve other methods of extracting data from the device, such as copying
17 the device’s active user files (known as a logical acquisition) or copying the device’s
18 entire file system (known as a file system acquisition). If none of these methods are
19 supported by the combination of tools available to the examiner and the device to be
20 searched, the agents and examiners may conduct a manual search of the device by
21 scrolling through the contents of the device and photographing the results.

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BACKGROUND RELATED TO INSTAGRAM SERVICES³

Instagram is a service owned by Facebook, a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Instagram is a free-access social networking service, accessible through its website and its mobile application, that allows subscribers to acquire and use Instagram accounts, like the target accounts listed in Attachment A-2, through which users can share messages, multimedia, and other information with other Instagram users and the general public.

Facebook collects basic contact and personal identifying information from users during the Instagram registration process. This information, which can later be changed by the user, may include the user's full name, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, credit card or bank account number, and other personal identifiers. Facebook keeps records of changes made to this information.

Facebook also collects and retains information about how each user accesses and uses Instagram. This includes information about the Internet Protocol ("IP") addresses used to create and use an account, unique identifiers and other information about devices and web browsers used to access an account, and session times and durations.

Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if "added" to the primary account, can switch between the associated accounts on a device without having to repeatedly log-in and log-out.

³ The information in this section is based on information published by Facebook on its website and its Instagram website, including, but not limited to, the following webpages: "Data Policy," <https://help.instagram.com/519522125107875>; "Information for Law Enforcement," <https://help.instagram.com/494561080557017>; and "Help Center," <https://help.instagram.com>.

1 Instagram users can also connect their Instagram and Facebook accounts to utilize
2 certain cross-platform features, and multiple Instagram accounts can be connected to a
3 single Facebook account. Instagram accounts can also be connected to certain third-party
4 websites and mobile apps for similar functionality. For example, an Instagram user can
5 “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a
6 connected Facebook account, or transfer an image from Instagram to a connected image
7 printing service. Facebook maintains records of changed Instagram usernames,
8 associated Instagram accounts, and previous and current connections with accounts on
9 Facebook and third-party websites and mobile apps.

10 Instagram users can “follow” other users to receive updates about their posts and
11 to gain access that might otherwise be restricted by privacy settings (for example, users
12 can choose whether their posts are visible to anyone or only to their followers). Users
13 can also “block” other users from viewing their posts and searching for their account,
14 “mute” users to avoid seeing their posts, and “restrict” users to hide certain activity and
15 prescreen their comments. Instagram also allows users to create a “close friends list” for
16 targeting certain communications and activities to a subset of followers.

17 Users have several ways to search for friends and associates to follow on
18 Instagram, such as by allowing Facebook to access the contact lists on their devices to
19 identify which contacts are Instagram users. Facebook retains this contact data unless
20 deleted by the user and periodically syncs with the user’s devices to capture changes and
21 additions. Users can similarly allow Facebook to search an associated Facebook account
22 for friends who are also Instagram users. Users can also manually search for friends or
23 associates.

24 Each Instagram user has a profile page where certain content they create and share
25 (“posts”) can be viewed either by the general public or only the user’s followers,
26 depending on privacy settings. Users can customize their profile by adding their name, a
27 photo, a short biography (“Bio”), and a website address.

28

1 One of Instagram’s primary features is the ability to create, edit, share, and interact
2 with photos and short videos. Users can upload photos or videos taken with or stored on
3 their devices, to which they can apply filters and other visual effects, add a caption, enter
4 the usernames of other users (“tag”), or add a location. These appear as posts on the
5 user’s profile. Users can remove posts from their profiles by deleting or archiving them.
6 Archived posts can be reposted because, unlike deleted posts, they remain on Facebook’s
7 servers.

8 Users can interact with posts by liking them, adding or replying to comments, or
9 sharing them within or outside of Instagram. Users receive notification when they are
10 tagged in a post by its creator or mentioned in a comment (users can “mention” others by
11 adding their username to a comment followed by “@”). An Instagram post created by
12 one user may appear on the profiles or feeds of other users depending on a number of
13 factors, including privacy settings and which users were tagged or mentioned.

14 An Instagram “story” is similar to a post but can be viewed by other users for only
15 24 hours. Stories are automatically saved to the creator’s “Stories Archive” and remain
16 on Facebook’s servers unless manually deleted. The usernames of those who viewed a
17 story are visible to the story’s creator until 48 hours after the story was posted.

18 Instagram allows users to broadcast live video from their profiles. Viewers can
19 like and add comments to the video while it is live, but the video and any user
20 interactions are removed from Instagram upon completion unless the creator chooses to
21 send the video to IGTV, Instagram’s long-form video app.

22 Instagram Direct, Instagram’s messaging service, allows users to send private
23 messages to select individuals or groups. These messages may include text, photos,
24 videos, posts, videos, profiles, and other information. Participants to a group
25 conversation can name the group and send invitations to others to join. Instagram users
26 can send individual or group messages with “disappearing” photos or videos that can
27 only be viewed by recipients once or twice, depending on settings. Senders cannot view
28 their disappearing messages after they are sent but do have access to each message’s

1 status, which indicates whether it was delivered, opened, or replayed, and if the recipient
2 took a screenshot. Instagram Direct also enables users to video chat with each other
3 directly or in groups.

4 Instagram offers services such as Instagram Checkout and Facebook Pay for users
5 to make purchases, donate money, and conduct other financial transactions within the
6 Instagram platform as well as on Facebook and other associated websites and apps.
7 Instagram collects and retains payment information, billing records, and transactional and
8 other information when these services are utilized.

9 Instagram has a search function which allows users to search for accounts by
10 username, user activity by location, and user activity by hashtag. Hashtags, which are
11 topical words or phrases preceded by a hash sign (#), can be added to posts to make them
12 more easily searchable and can be “followed” to generate related updates from Instagram.
13 Facebook retains records of a user’s search history and followed hashtags.

14 Facebook collects and retains location information relating to the use of an
15 Instagram account, including user-entered location tags and location information used by
16 Facebook to personalize and target advertisements.

17 Facebook uses information it gathers from its platforms and other sources about
18 the demographics, interests, actions, and connections of its users to select and personalize
19 ads, offers, and other sponsored content. Facebook maintains related records for
20 Instagram users, including information about their perceived ad topic preferences,
21 interactions with ads, and advertising identifiers. This data can provide insights into a
22 user’s identity and activities, and it can also reveal potential sources of additional
23 evidence.

24 In some cases, Instagram users may communicate directly with Facebook about
25 issues relating to their accounts, such as technical problems, billing inquiries, or
26 complaints from other users. Social networking providers like Facebook typically retain
27 records about such communications, including records of contacts between the user and
28

1 the provider's support services, as well as records of any actions taken by the provider or
2 user as a result of the communications.

3 For each Instagram user, Facebook collects and retains the content and other
4 records described above, sometimes even after it is changed by the user (including
5 usernames, phone numbers, email addresses, full names, privacy settings, email
6 addresses, and profile bios and links).

7 In my training and experience, evidence of who was using Instagram and from
8 where, and evidence related to criminal activity of the kind described above, may be
9 found in the files and records described above. This evidence may establish the "who,
10 what, why, when, where, and how" of the criminal conduct under investigation, thus
11 enabling the United States to establish and prove each element or, alternatively, to
12 exclude the innocent from further suspicion. For example, the stored communications
13 and files connected to an Instagram account may provide direct evidence of the offenses
14 under investigation. Based on my training and experience, instant messages, emails,
15 voicemails, photos, videos, and documents are often created and used in furtherance of
16 criminal activity, including to communicate and facilitate the offense under investigation.

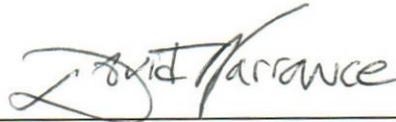
17 In addition, the user's account activity, logs, stored electronic communications,
18 and other data retained by Facebook can indicate who has used or controlled the account.
19 This "user attribution" evidence is analogous to the search for "indicia of occupancy"
20 while executing a search warrant at a residence. For example, subscriber information,
21 email and messaging logs, documents, and photos and videos (and the data associated
22 with the foregoing, such as geo-location, date and time) may be evidence of who used or
23 controlled the account at a relevant time. As an example, because every device has
24 unique hardware and software identifiers, and because every device that connects to the
25 Internet must use an IP address, IP address and device identifier information can help to
26 identify which computers or other devices were used to access the account. Such
27 information also allows investigators to understand the geographic and chronological
28 context of access, use, and events relating to the crime under investigation.

1 Account activity may also provide relevant insight into the account owner's state
2 of mind as it relates to the offenses under investigation. For example, information on the
3 account may indicate the owner's motive and intent to commit a crime (*e.g.*, information
4 indicating a plan to commit a crime), or consciousness of guilt (*e.g.*, deleting account
5 information in an effort to conceal evidence from law enforcement).

6 Therefore, Facebook's servers are likely to contain stored electronic
7 communications and information concerning subscribers and their use of Instagram. In
8 my training and experience, such information may constitute evidence of the crimes
9 under investigation including information that can be used to identify the account's user
10 or users.

11 **CONCLUSION**

12 Based upon the information set forth above, I respectfully submit that there is
13 probable cause to believe the property to be searched contains evidence of the offense of
14 Providing Material Support to a Foreign Terrorist Organization, in violation of Title 18,
15 United States Code, Section 2339B.

16 

17
18 DAVID NARRANCE, Affiant
19 Special Agent, FBI

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21 The above-named agent provided a sworn statement attesting to the truth of the
22 contents of the foregoing affidavit by telephone on this 15th day of June, 2021.

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26 HONORABLE BRIAN A. TSUCHIDA
27 Chief United States Magistrate Judge
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Exhibit 1
(Criminal Complaint)

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

NO. MJ21-322

COMPLAINT FOR VIOLATION

v.

ELVIN HUNTER BGORN WILLIAMS,
Defendant.

BEFORE, Chief United States Magistrate Judge Brian A. Tsuchida, Seattle, Washington.

The undersigned complainant, David Narrance, Special Agent, Federal Bureau of Investigation, being duly sworn states:

COUNT 1

(Providing Material Support to a Designated Foreign Terrorist Organization)

Beginning in or before November 2020, and continuing through May 28, 2021, within the Western District of Washington, and elsewhere, ELVIN HUNTER BGORN WILLIAMS knowingly attempted to provide material support and resources, that is, personnel, including himself, and services, to a designated foreign terrorist organization, namely, the Islamic State or Iraq and al-Sham (“ISIS”), with knowledge that ISIS was a designated terrorist organization and that it engaged in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

1 This complaint is to be presented by reliable electronic means pursuant to Federal
2 Rules of Criminal Procedure 4.1 and 41(d)(3). And the complainant further states:

3 **Affiant's Training and Experience**

4 I, David Narrance, am a Special Agent with the Federal Bureau of Investigation
5 ("FBI"). I have been a Special Agent with the FBI since August 2014. I am presently
6 assigned to the FBI Seattle Joint Terrorism Task Force ("JTTF"). I have received
7 training regarding investigating terrorism related offenses and other national security
8 matters. During my career, I have participated in numerous investigations of individuals
9 who were involved in terrorist related activities and motivated by extremist ideologies.
10 Prior to joining the FBI, I worked for eight years as a federal agent for the United States
11 Border Patrol.

12 The facts in this affidavit come from my training and experience, and information
13 obtained from other agents, law enforcement officers, intelligence analysts, and
14 witnesses. This affidavit is intended to show there is sufficient probable cause that the
15 defendant committed the offense alleged above and does not set forth all my knowledge
16 about this matter.

17 **The Islamic State's Designation as a Foreign Terrorist Organization**

18 On or about October 15, 2004, the U.S. Secretary of State designated al Qaeda in
19 Iraq ("AQI"), then known as Jam 'at al Tawid wa' al-Jahid, as a Foreign Terrorist
20 Organization ("FTO") under Section 219 of the Immigration and Nationality Act (the
21 "INA") and as a Specially Designated Global Terrorist entity under Section 1(b) of the
22 Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the
23 designation of AQI as a FTO under Section 219 of the INA and as a Specially Designated
24 Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias
25 Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also
26 added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (i.e.,
27 "ISIS," which is how the FTO will be referenced herein), the Islamic State of Iraq and
28 Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-

1 Furquan Establishment for Media Production. On September 21, 2015, the Secretary
2 added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date,
3 ISIS remains a designated FTO.

4 **Overview of the Investigation**

5 Williams is a self-radicalized ISIS adherent who, in November 2020, pledged an
6 oath of “bayat” (allegiance)¹ to Abu Ibrahim al-Hashimi al-Quarashi, the current leader
7 of ISIS. Since then, Williams has told others, including family members, friends, and
8 associates, as well as multiple FBI confidential human sources (“CHSs”), that he wants to
9 travel overseas, join ISIS, and wage jihad on behalf of ISIS.

10 In February 2021, Williams began communicating over an encrypted messaging
11 application with two FBI CHSs who represented themselves to be ISIS recruiters who
12 would approve and facilitate Williams’ travel for jihad on behalf of ISIS. Through these
13 purported ISIS recruiters, Williams tendered a putative application to ISIS listing his
14 reason for travel as “jihad.” The “recruiters” ultimately told Williams that his application
15 had been approved, and Williams requested to travel to the Sinai desert to fight with ISIS.
16 The “recruiters” told Williams that his travel would receive final authorization after he
17 obtained a passport and purchased an airline ticket.

18 During the spring of 2021, Williams applied for a U.S. passport and worked at a
19 job in the Seattle area to save money for his intended travel. Williams also recruited
20 another Seattle area associate to travel with him; unbeknownst to Williams, this associate
21 recently had become another FBI CHS. Williams received his passport on May 6, 2021.
22 That same day, Williams sent the purported ISIS recruiters a photograph of the passport
23 and purchased an airline ticket for travel from Seattle, via Amsterdam and Paris, to Cairo,
24 Egypt, departing on May 28, 2021, at 1:35 p.m. Williams was arrested on May 28, 2021,
25 at Seattle-Tacoma International Airport, as he attempted to board the flight to Cairo.

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¹ Where English words in brackets follow Arabic words in this document, they have been supplied by an FBI
Arabic linguist who reviewed the affidavit.

Background of the Investigation

Williams is a United States citizen who was born on November 12, 2000, in or near Santa Rosa, California. Williams first came to the attention of the FBI in October 2017 when, as a juvenile, he caused concern among administrators at his high school. The school administrators contacted the FBI and reported, among other things, that Williams told others at the school that he wanted to join ISIS and claimed that the May 2017 ISIS attack at a music concert in Manchester, United Kingdom, during which numerous people were killed and injured, was justified because the performer dressed provocatively.

FBI Special Agents interviewed Williams' mother on November 17, 2017. Williams' mother reported that Williams told her he wanted to move to Syria or Iraq to fight for ISIS. She also stated that Williams had been kicked off social media for terms of service violations related to pro-ISIS posts. Williams' mother explained that she terminated internet service at her home because Williams was using the internet to access ISIS-related sites and social media accounts. Williams' mother made a subsequent report to authorities that she was concerned Williams wanted to travel to Syria to join a foreign terrorist organization.

Concerned Citizen Approaches the FBI about Williams' Activities

In November 2020, a concerned citizen approached the FBI on behalf of a Seattle area mosque. The citizen reported that members of the mosque had been looking after Williams for over a year as an act of charity – encouraging Williams to de-radicalize, assisting him with a place to live, with food, and with tuition for a semester of college. Members of the mosque also provided Williams with a cell phone and a laptop computer, in hopes that they would assist Williams with a job search. The mosque members made clear to Williams that he would be required to abandon ISIS if wanted to accept the mosque's help. When the concerned citizen observed Williams using the phone to view ISIS videos and engage in online chats with like-minded radical individuals, the concerned citizen directed Williams to return the cell phone that had been provided to

1 him. Members of the mosque reviewed the cell phone and were disturbed to find
2 numerous ISIS-related videos that depicted scenes of graphic violence (including
3 summary executions and beheadings by ISIS militants); other ISIS military propaganda;
4 and a video on how to manufacture explosives, which Williams appeared to have
5 distributed to others. The concerned citizen also examined an encrypted messaging app
6 on the phone and found that Williams had accessed numerous ISIS videos. Members of
7 the mosque ultimately returned the phone to Williams at his request because Williams
8 said that he needed a phone to facilitate a job interview. The concerned citizen explained
9 that the mosque terminated its efforts to support Williams after this interaction.²

10 In response to this new information, the FBI opened an investigation of Williams.
11 FBI agents interviewed Williams' mother on several occasions during late 2020 and early
12 2021. She explained that Williams had recently been attending a mosque and that he
13 upset the members due to his radical behavior. She stated that members of the mosque
14 contacted her and said they were worried that Williams would be "a terrorist and do an
15 attack one day." According to the mother, Williams was both verbally and physically
16 abusive to both herself and her daughter on a regular basis.

17 Williams' mother said that Williams refers to ISIS as "our people" and that he was
18 becoming more radical each day. According to the mother, Williams had recently begun
19 talking about plans to move to Burma to "become a terrorist for real," in her words.
20 Williams stated that ISIS has a list of cities in Burma with ISIS members inside.
21 Williams further said that "everyone is waiting" and soon there would be a terrorist
22 attack. Williams claimed to be waiting for approval to carry out an attack and described
23 a chain of command within ISIS that approves such attacks. The mother also stated that
24 Williams was obsessed with weapons, although she did not know him to have direct
25 access to any weapons. She further stated that Williams likes to talk about explosives
26 and chemicals and has read books about explosives in the past.

27 _____
28 ² The concerned citizen described above subsequently became an FBI CHS, hereafter referred to as "CHS-1."
CHS-1 has declined any compensation for CHS-1's work.

1 On December 26, 2020, FBI agents interviewed one of Williams’ former
2 roommates who lived with him in or about October 2020. When shown a photograph of
3 Williams, the roommate turned to his other roommates (who were present for the
4 interview) and stated, “Yeah, the terrorist I was talking about. You guys thought I was
5 joking.”³ According to the roommate, Williams told him that he (Williams) wanted to
6 join ISIS and would regularly and openly discuss his affinity for ISIS. The roommate
7 further stated that he saw Williams regularly engage in ISIS-related online chatrooms.
8 The roommate described Williams as “radical.”

9 FBI agents interviewed Williams on several occasions during late 2020. On
10 December 22, 2020, Williams spoke with FBI agents and admitted that he regularly made
11 pro-ISIS postings on various social media platforms. Williams further stated that he no
12 longer attended any mosque because he was “too extreme” for all the local mosques.
13 Williams stated that he felt isolated, lonely, and repeatedly expressed the desire to “find a
14 wife.” Williams stated that he had been “off of [his] medications” for about a year. He
15 admitted to previously having suicidal thoughts but claimed to currently have no
16 intentions of hurting himself or others. Williams told the agents that he wants to travel to
17 the Maldives because there are more ISIS supporters there.

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³ Throughout this affidavit, when oral statements are put in quotation marks, they are the most accurate version of the statements available to date. In some instances, more formal transcriptions may become available at a later time.

Williams Pledges Allegiance to ISIS

On or before November 20, 2020, Williams posted an online video of himself pledging allegiance to ISIS.⁴ In the video, Williams is heard pledging his allegiance to Abu Ibrahim al-Hashimi al-Qurashi, the leader of ISIS. There is text imposed over the beginning of the video which reads, “Gave my pledge today,” as depicted below:



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⁴ According to records obtained during this investigation, two days earlier, on or about November 18, 2020, Williams sought guidance online from another person regarding how to properly pledge allegiance, or “make bayat,” to ISIS, asking, “Asalaamu alaikum, can you send me what I need to say for my pledge.” The other person responded, “You mean bayat?” Williams responded in the affirmative. The other person responded with the following text, which Williams used in his video: “I (your name) swear allegiance to Amir al-Mumineen Abu Irahim Al-Hashimi Al-Qurayshi in following the religion of Allah, in obeying the ruler in what I like and dislike, in obedience until I see a clear kufr from him and will have argument from Allah to this.”

1 Williams thereafter began describing himself as a member of ISIS. For example,
2 on November 24, 2020, Williams engaged in an online conversation with CHS-3.⁵ CHS-
3 3 asked if Williams was a true supporter of “Dawlah,” another name for ISIS. Williams
4 responded, “If you have questions regarding *our* aqeedah [creed] and beliefs I can send
5 you some stuff. There is a lot of slander against *us*.” (emphasis added). On January 5,
6 2021, Williams told CHS-3 about his interest in traveling to Burma to “make hijrah.”
7 Among other things, Williams stated: “There will be a call to make hijrah soon []. The
8 location is Burma, I hope to see you there. . . . I’ll let you know when they make the
9 call, brother.” Based on my training and experience, and my familiarity with the facts of
10 this investigation, I understand that the phrase “make hijrah” in this context is a reference
11 to foreign travel for the purpose of fighting on behalf of ISIS.

12 In January 2021, an FBI online covert employee (“OCE-1”) contacted Williams
13 after observing ISIS propaganda and beheading videos on Williams’s social media
14 accounts. Williams was initially suspicious of OCE-1, but eventually engaged him in
15 conversation. Among other things, Williams told OCE-1: “Anwar al Awlaki is one of my
16 favorites, he was made *shaheed* [martyr].”⁶ Williams also told OCE-1 that he wanted to
17 travel to Burma to fight for ISIS, and sent OCE-1 violent ISIS videos and two ISIS
18 propaganda publications. One publication was issued by ISIS’s al-Hayat Media Center in
19 August 2017. In the publication, ISIS reiterated its previous claims of responsibility for
20 recent terrorist attacks that occurred in Spain, Russia, Brussels, and Turkey. The second
21 publication was released on December 25, 2020, by a group in Burma allied with ISIS.
22 The publication exhorted ISIS followers to travel to Burma to fight on behalf of ISIS.

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25 ⁵ CHS-3 was opened by the FBI on June 3, 2020. CHS-3 was arrested on state criminal charges and agreed to
26 cooperate with the FBI in consideration for a sentencing reduction. CHS-3 also has been compensated for some of
27 CHS-3’s services. CHS-3’s reporting consistently has been reliable and corroborated. Among other things, CHS-
28 3’s cooperation has resulted in thwarting two planned terrorist attacks.

⁶ Anwar Al-Awlaki was an Islamic lecturer and a leader of Al-Qaeda in the Arabian Peninsula (“AQAP”), a
Yemen-based designated foreign terrorist organization that has claimed responsibility for terrorist acts against
targets in the United States, Saudi Arabia, Korea and Yemen since its inception in January 2009. Pursuant to a
Presidential Executive Order, Al-Awlaki was designated by the United States as a “Specially Designated Global
Terrorist” on July 12, 2010. Al-Awlaki was reportedly killed in Yemen in September 2011.

1 **Williams Discusses ISIS and his Travel Plans with a Family Member**

2 In early January 2021, a family member contacted the FBI and reported that they
3 had recorded a conversation with Williams out of concern that Williams was radicalized
4 and poised to commit a crime. The family member shared the recording with the FBI.⁷
5 During the conversation, Williams identified himself as a member of ISIS, spoke of his
6 suspicion that he was being monitored by the FBI, and spoke of plans to travel to Burma
7 to fight with ISIS militants. When Williams began speaking about traveling to Burma, it
8 prompted the family member to begin recording the conversation. Relevant portions of
9 the conversation are transcribed below:

10 **Relative:** Okay, so what was that Hunter? So, what pl.... what did you
11 say? Burma. That's where I stopped.

12 **Williams:** I said probably a major reason why the FBI is so interested in
13 me, is because we are more of a threat now than we were before because
14 we are literally everywhere in territories in Africa. We have territories in
15 Afghanistan, Iraq now, again. Sham, which is Syria, again. We have
16 territories in Lebanon. We have territories in Jordan. We have territories in
17 Myanmar which is also known as Burma. We have territories in Kashmir,
18 which India is currently occupying. We're even forming in India.

19 **Relative:** Okay, who is "we" though? Is there a name? I'm just asking.

20 **Williams:** I said it like six times []. I'm not gonna repeat myself.

21 **Relative:** What's the name?

22 **Williams:** Especially if the FBI is probably freaking fucking parked outside.

23 **Relative:** Is there a fucking name?

24 **Williams:** Yes, I just said it! ISIS, Dawlah, Daesh. It's the same word.

25 **Relative:** So, what Hunter. You're going to move to Burma?

26 **Williams:** Yeah, I'm going to go live there.
27

28 ⁷ The family member recorded this conversation on their own initiative, with no involvement or prompting to record conversations by the FBI.

1 **Relative:** How are you going to get to Burma?
2

3 **Williams:** I'm gonna take a frickin' flight.

4 **Relative:** How are you gonna get the flight? You don't have the money.
5 You don't have a passport.

6 **Williams:** I'm gonna get a passport.

7 **Relative:** You don't have an ID. How are you gonna pay for this?
8

9 **Williams:** The flight to Burma is only like 500 bucks. I'm getting a job [].

10 **Relative:** Where?
11

12 **Williams:** I don't know where yet. I just went to the Goodwill, probably
13 there. Probably with the FBI. They probably want me to get a job with them
14 so they can monitor every little thing I'm doing.

15 **Relative:** Why don't you just work with them?

16 **Williams:** I'm not gonna work with these people. You don't work with
17 these people.

18 * * * * *

19 **Relative:** So how are you able to know everyone's all over these places
20 then moving?

21 **Williams:** Because we report on it and the media is reporting on it but it's
22 being covered up.

23 **Relative:** Who do you report to?

24 **Williams:** Because they're trying to make it seem like ISIS is a distant threat.

25 **Relative:** What do you mean, you report to it? What is that supposed to mean?
26

27 **Williams:** We have frickin' articles. We have our own media. You know
28 the videos we post? They're Hollywood quality videos []. We have HD and
4k videos. We have a whole news service.

Relative: How do you get your news?

1 **Williams:** Through [website], it's a site.

2 **Relative:** So, anybody can just...

3 **Williams:** No, not anybody. It's a secret site.

4 **Relative:** So, how did you find it if it's secret?

5 **Williams:** 'Cause I'm in the loop.

6 * * * * *

7 **Relative:** Okay, well, I didn't raise you to be racist.

8 **Williams:** I'm not racist.

9 **Relative:** And I didn't raise you to be a terrorist, either.

10 **Williams:** I'm not racist.

11 * * * * *

12 **Relative:** So, how do you know where you're moving? What do you mean?

13 **Williams:** It hasn't been... We're not told to go anywhere yet.

14 **Relative:** Who tells you?

15 **Williams:** We'll hear it.

16 **Relative:** From?

17 **Williams:** It will probably be all over the news.

18 **Relative:** From where? A bird? Where do you hear it from?

19 **Williams:** Yeah, a little tweety bird [].

20 **Relative:** Where do you hear it from? Who?

21 **Williams:** The loop.

22 **Relative:** What loop?

23 **Williams:** Somebody hears it from somebody, who hears it from
24 somebody. It's a chain of command.
25
26
27
28

Williams Participates in Radical Online Group Chats

Williams also spoke of his allegiance to ISIS and his determination to travel in support of ISIS in several online group chats during the same time period.⁸ For example, records obtained in the course of this investigation document that on or about November 13, 2020, Williams participated in a group chat using the moniker “thatrussianmuslim,” during which Williams explained how he first learned about Islam. Williams also stated, “I was going to go and do my jihad in Iraq and Sham but the caliphate lost territory there . . .” In another group chat on or about November 18, 2020, Williams stated, “The caliphate will rise again soon *inshAllah* [God willing], the only reason it was defeated is they stopped people from making hijrah and funding the caliphate.” On February 15, 2021, Williams, using the account “ar_rusi_al_assad,” told another person online: “I will be martyred.”

On or about November 12-18, 2020, Williams used the account “thesilentmuwahid” to engage in group chats over an encrypted social media application. Among other things, Williams stated: “[I] want my photos online just in case I become a *shaheed* [martyr]”; “It happened when I posted all the instruction vids and bomb making video”; “The only reason why I stay kinda quiet and don’t say or discuss things I want is so I don’t get raided before I can be martyred”; “Can somebody send me the ruling on suicide bombing. . . But by ones own hand, such as a truck bombing or vest”; “Since I have no defense I suppose I will use my offense. Nobody will help me supply myself with a shield so I will supply them with the end of my sword.”

On December 23, 2020, Williams, using the moniker “Ali Ar-Rusi,” engaged in an online chat during which, among other things, he made the following statements about ideas for conducting an attack:⁹

⁸ Williams often participated in chats that were closed to the public and open only to members who were vetted by a moderator. Once in the group, participants tended to talk freely about their ISIS affiliation and commitment to radical jihad.

⁹ This conversation was observed online by a former FBI CHS, who was not a participant in the conversation but captured screenshots of it and provided them to the FBI.

- 1 • “We need to attack a public event one with some degenerate celebrity like
2 the one in 2017 with that whore [name omitted].”
- 3 • “My options are motor vehicle and the ancient one: fire.”
- 4 • “Fire spreads fast and can kill many if set in an apartment or place of
5 business but can be thwarted and put out.”
- 6 • “Idk how to make explosives powerful enough for anything nor do I have
7 the money.”

8 Williams continued to discuss his desire to travel to join ISIS through early 2021.
9 On or about February 15, 2021, Williams used the moniker “ar_rusi_al_assad” to tell
10 another person, “I am getting [a] passport to leave this disgusting land. Before I do my
11 [ISIS application] must be approved and then I shall leave once they are.” On
12 February 16, 2021, in response to an online solicitation for donations to support ISIS,
13 Williams responded, “Well [] I may be able to help with the donations, I am unsure as I
14 am saving to travel but if I get credit card I will most definitely help.”

15 Williams Begins to Arrange Travel to Fight for ISIS

16 On or about January 4, 2021, Williams spoke to CHS-1 about his desire to travel
17 overseas and join ISIS. According to CHS-1, Williams said it was his *dawah* (duty) to
18 commit a violent act to get his message across. Williams further stated that he was
19 waiting for his call to hijrah. CHS-1 asked Williams whether he was in contact with any
20 ISIS authorities overseas to receive the call to hijrah. Williams replied, “You would be
21 surprised.” Williams later admitted that he had been making multiple attempts to contact
22 overseas ISIS members, although he said they were suspicious that he was law
23 enforcement. According to CHS-1, at that time, Williams had no immediate plans for
24 violence, but was ready for it when the call came. CHS-1 stated that Williams was
25 becoming increasingly radicalized as he spent more and more time online.

26 On or about February 4-6, 2021, Williams engaged in a chat via an encrypted
27 messaging app with two individuals who represented themselves to be ISIS recruiters. In
28

1 fact, they were FBI confidential human sources, CHS-4 and CHS-5.¹⁰ Williams first
 2 encountered CHS-4 in an online group chat. CHS-4 portrayed himself as someone who
 3 had direct contacts with an overseas ISIS recruiter. Williams asked CHS-4 to introduce
 4 him to the recruiter. CHS-4 ultimately introduced Williams to CHS-5, who was
 5 described as an overseas ISIS recruiter who would facilitate Williams' travel for jihad.

6 During one of his early conversations with CHS-4, Williams discussed a recent
 7 coup in Burma perpetrated by militants who pledged allegiance to ISIS. Williams stated:
 8 "There is going to be a call for hijrah there very very soon. Maybe this year or the next."
 9 Williams then stated, "I am trying to get into contact [with ISIS]. But no luck so far."
 10 CHS-4 offered: "I know a brother who apparently has contact," referring to CHS-5.
 11 Williams replied: "Send me his contact. I need to leave this place." CHS-4 then initiated
 12 a group chat between Williams, CHS-4, and CHS-5, some of which is reflected in the
 13 below screenshots. Williams used the moniker "Ali Ar-Rusi" during the conversation.

14 Williams asked CHS-5 for guidance on how to "make hijrah," as follows:¹¹



24 ¹⁰ CHS-4 was opened by the FBI on or about July 8, 2020. CHS-4 was previously investigated by the FBI due to
 25 his expressing the desire to fight overseas in Yemen and become a mujtahid/martyr. CHS-4 was offered a
 26 cooperation agreement in lieu of charges. CHS-4's motivation was initially to work off these charges. CHS-4 also
 has been compensated for his services. CHS-4 has been reliable and some of his reporting has been corroborated.

27 CHS-5 was opened by the FBI on or about May 26, 2015. CHS-5 was previously the subject of an FBI counter-
 28 terrorism investigation, but was never charged with a crime. CHS-5 has assisted the FBI in several investigations.
 CHS-5 has been reliable and much of his reporting has been corroborated. Over the years, CHS-5 has been
 compensated for his services.

¹¹ In order to protect the identity of sources, CHS monikers and avatars have been removed from all images.

1 When CHS-5 asked, “U need hijrah *akhi* [brother]?” Williams responded:

2 U need hijrah ahky?
3 Yes I want to make hijrah and help
4 with the next caliphate 8:33 PM

5 Williams added:

6 Ali Ar-Rusi
7 I have nothing here in this dunya,
8 and I wish to please Allah and
9 attain martyrdom 8:33 PM

10 The conversation continued with Williams stating:

11 U want istashahadiya?
12 Yes brother, I seek martyrdom in
13 the cause of Allah 8:34 PM

14
15 CHS-5 then asked if Williams wished to mount an attack in America or travel
16 abroad to fight jihad:¹²

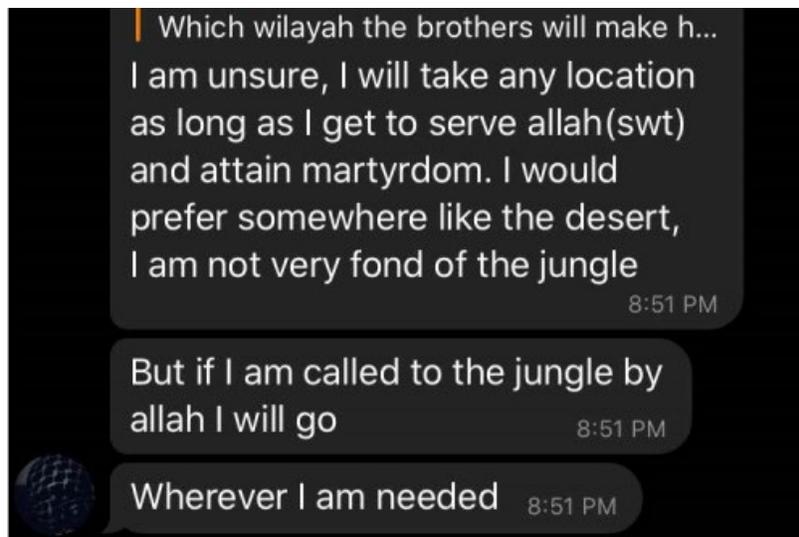
17 Ali Ar-Rusi
18 Yes brother, I seek martyrdom in the ca...
19 Sorry ahk but confused u want to
20 make migration or to do
21 istashahadiya fee amerika or after
22 hijrah 8:34 PM
23 Ali Ar-Rusi
24 I want to leave America to help my
25 brothers and fight in the cause of
26 Allah 8:35 PM

27
28 ¹² Based upon my discussions with FBI linguists, I understand that the Arabic phrase *istashahidiya fee amerika* means self-martyrdom, *i.e.*, a suicide attack, in the United States.

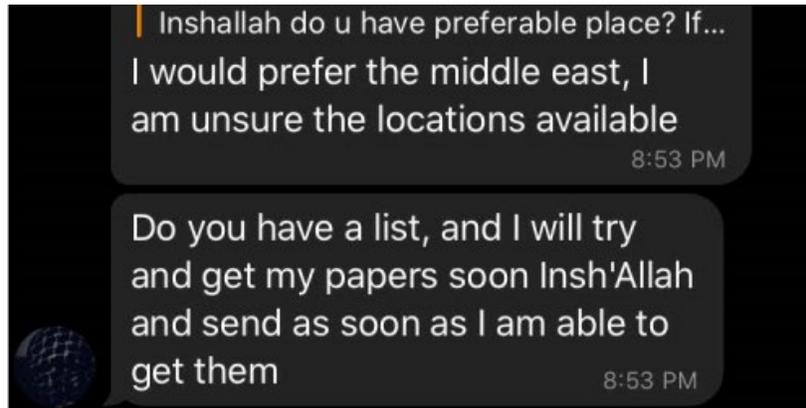
1 As the conversation went on, CHS-5 explained that Williams would need to make
2 an application to join ISIS, and that the application would be vetted by ISIS leadership.
3 Williams endeavored to prove his commitment to CHS-5, sending photographs of himself
4 and noting, "I train hard to serve allah in the fields of jihad."



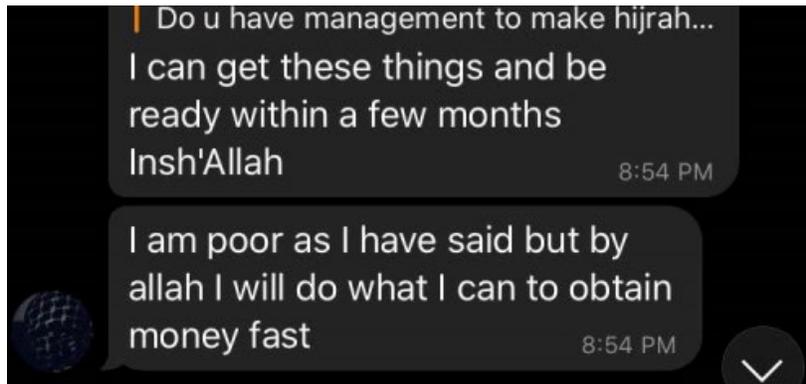
18 CHS-5 asked Williams where he would like to travel, and Williams responded:



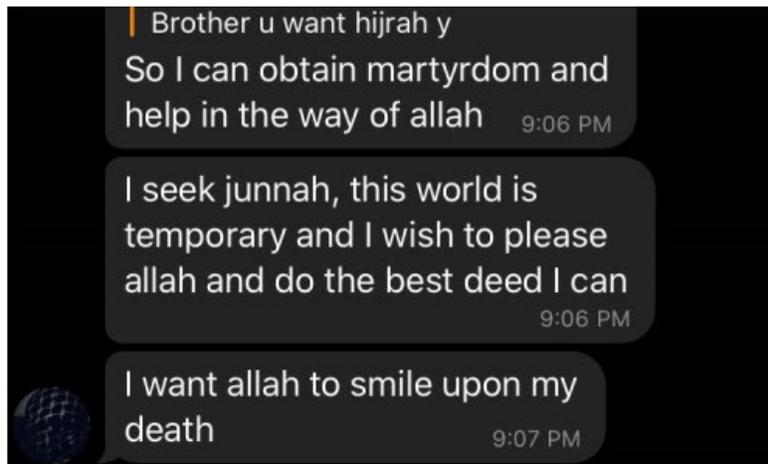
1 Williams added:



9 CHS-5 asked whether Williams had the means to travel, including money for an
10 airline ticket and passport, and Williams responded:



18 Later in the conversation, CHS-5 probed Williams' commitment to jihad, asking
19 why he wanted to make "hijrah." Williams responded as follows:¹³



¹³ Based on discussions with FBI linguists, I understand that the Arabic term *junnah* means eternal paradise.
COMPLAINT - 17

1 CHS-5 asked Williams, “U know brother the media that show beheading and
2 death to our enemies. This u want?” Williams responded, “Indeed.” The conversation
3 continued as follows:

4 U have problem with killing or
5 something? 9:09 PM
6 Ali Ar-Rusi
7 No I do not 9:09 PM
8 Not in the slightest bit 9:09 PM

9
10 If u are fighting and u find enemy
11 who surrender to u and ir by
12 urself. What do u do. 9:11 PM
13 Ali Ar-Rusi
14 I take him as a prisoner unless told
15 to do otherwise, if the order is
16 given to shoot him I will do so, if
17 the order is to capture I will do so
18 9:12 PM

19 What do u think of beheading?
20 With knife or something u know
21 9:14 PM
22 Ali Ar-Rusi
23 I would love to do this 9:14 PM

24 Blood doesn't bother u???? Hhh
25 blood bother me from my cut
26 9:15 PM
27 Ali Ar-Rusi
28 No it does not bother me in the
slightest bit 9:15 PM
As I said I am firm with death and
have no fear 9:15 PM

1 As the conversation continued, CHS-5 explained a months-long approval process
 2 through which Williams' application would be reviewed by multiple layers of ISIS
 3 leadership. At the end of the process, Williams' travel would be approved to a specific
 4 location, and he would be notified. CHS-5 told Williams that after travel and training in
 5 that location, he would be an "official mujahid." During this and subsequent
 6 conversations, CHS-5 made clear to Williams that before final approval would be granted
 7 and a specific travel destination designated, Williams would first need to obtain a
 8 passport for travel. Williams asked, "How long does this [ISIS application process]
 9 usually take to send and get approval?" CHS-5 replied that it would take at least one
 10 week for initial approval and likely one month for final approval. Williams responded:



19 CHS-5 sent Williams the purported ISIS application to fill out. Williams tendered
 20 the below responses to the application, providing his full name, stating that his reason for
 21 travel was "Jihad," and describing himself as being "strong, proficient in close quarters
 22 with handgun":¹⁴

23

24

25

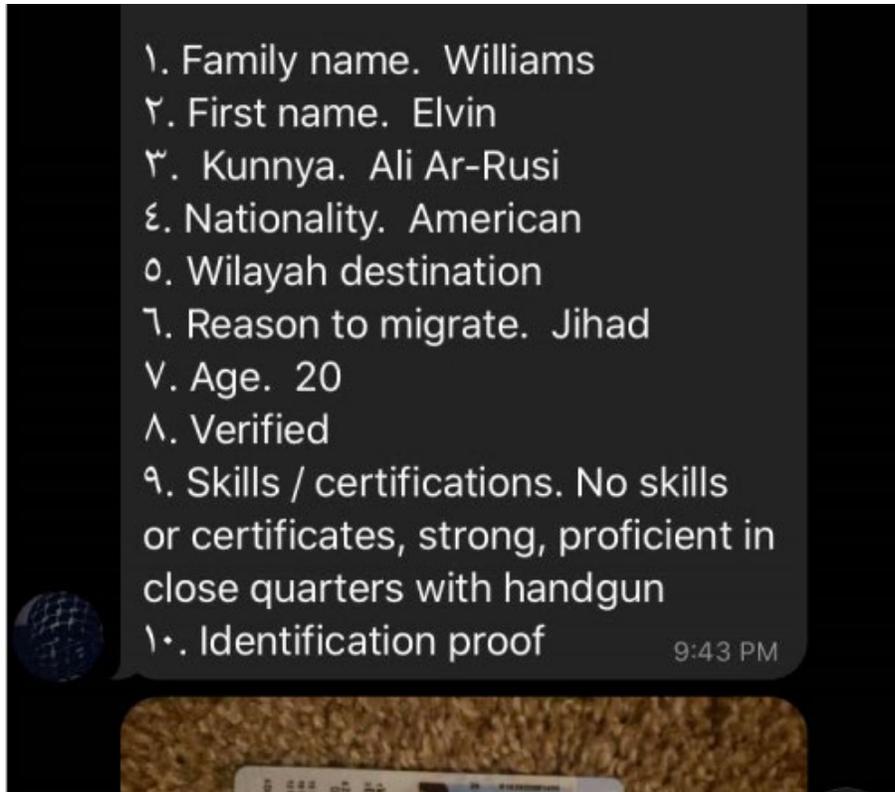
26

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¹⁴ CHS-5 told Williams to ignore questions five and seven in the application ("Wilayah destination"/"Verified").
 COMPLAINT - 19

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During the conversation, Williams sent CHS-5 photographs of his Social Security card, his Washington State driver's license, and a picture of himself:

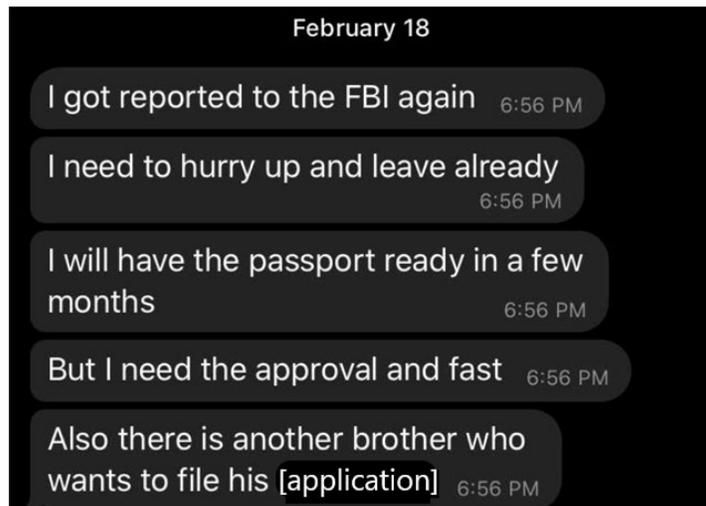


Williams Begins Preparations to Travel

During this investigation, an FBI confidential human source, CHS-2, communicated with Williams online and in person.¹⁵ On February 14, 2021, Williams told CHS-2 that he needed to obtain a passport immediately. Williams asked CHS-2 to help him pay for the passport. Williams initially would not divulge why he wanted to obtain the passport. However, in the days that followed, Williams told CHS-2 about his desire to travel to fight with ISIS, and he attempted to convince CHS-2 to join him.

On or about February 18, 2021, during a text conversation with CHS-2, Williams stated he was worried that he would not be able to leave “this disgusting place,” and added, “Maybe they will put me on no fly list If they do they will regret it and I will make my j** [jihad] here.” When CHS-2 asked Williams to clarify, Williams responded, “I am not going to discuss this on the phone but if I am prevented from leaving the land of the *kuffar* [non-believers] it will be so.” Williams also stated, “We will see when we file for passport []. FBI may come to speak with me.”

On February 18, 2021, Williams contacted CHS-4 (one of the purported ISIS recruiters) via messaging app and stated:



¹⁵ Williams and CHS-2 had a personal relationship through a Seattle area mosque for over one year prior to the beginning of this investigation. CHS-2 became an FBI source in February 2021. CHS-2 has been compensated for expenses. CHS-2 has pending charges in Washington State relating to solicitation of a minor. CHS-2 is hoping to receive consideration regarding the pending state charges, although no promises have been made to CHS-2.

1 In response, CHS-4 asked how Williams was reported to the FBI. Williams
2 answered, "Long story. But I will have passport ready in few months so I'd like to get
3 the [ISIS application] approved by then." When asked about the other "brother,"
4 Williams answered, "The brother I am giving *dawah* [proselytizing] to, he wants to come,
5 and he will give *bayah* [allegiance]." Williams elaborated: "He's the person whom I am
6 living with in a few days. . . I vouch for him."¹⁶ CHS-4 asked, "Alright. How serious is
7 he about this?" Williams answered, "We are getting passports and he is helping me and
8 supplying me with my passport. So I'd say 100%." Williams further stated, "He's with
9 me now." At the time, Williams was with CHS-2. As noted above, Williams recently
10 had begun attempting to convince CHS-2 to travel with him to fight with ISIS.

11 During a conversation on or about February 22, 2021, Williams again told CHS-2
12 that he needed to obtain a passport. Williams speculated that it would take at least two
13 months to receive the passport. Williams also said, "I gotta see if the brothers can help
14 me out with the money for the [airline] ticket." During the same conversation, Williams
15 said, "This is what I'm saying man, [if] they prevent me from leaving America, they're
16 gonna fucking regret it." Williams explained that he would prefer to conduct an attack
17 overseas but would instead conduct an attack in the United States if he is not allowed to
18 travel abroad. Williams opined that he would be able to kill more people if he goes
19 overseas, as compared to a local attack that would only kill around 20 people. Williams
20 also explained that it was easy to get a rifle without registering it. Williams then showed
21 CHS-2 an explosives-making video and claimed to know how to make explosives,
22 although he admitted he had never done so before. Williams also told CHS-2 that he
23 wanted to introduce CHS-2 to his ISIS contacts and would like for CHS-2 to fight
24 overseas with him.

25 On February 24, 2021, Williams' mother contacted the FBI to report that Williams
26 had recently asked her for a copy of his birth certificate. According to his mother,
27
28

¹⁶ At this time, Williams was hoping to move in with CHS-2, although that did not happen.

1 Williams said he needed the birth certificate in order to get a passport, and that he would
2 be “leaving with his brothers” in a few months.

3 On February 24, 2021, during a discussion with CHS-2 over a messaging app,
4 Williams expressed frustration about his current life situation. CHS-2 asked how he
5 could help. Williams replied: “Nope literally nothing you can do, I am just going to live
6 here and die here, entirely alone, without a spouse, hated by everybody except a few.
7 Living in this disgusting land of fitnah and temptations.” CHS-2 replied: “I can help with
8 passport, ticket if you want.” Williams stated that he was embarrassed and felt bad
9 because CHS-2 had helped him with so much in the past. CHS-2 replied: “You don’t
10 have to feel embarrassing man. If you want to travel or not, that’s your choice. I am here
11 to help as brother.” Williams responded, “I need and want to get away from here.” CHS-
12 2 asked, “How can I help brother?” Williams stated: “I need money for passport and
13 flight ticket with you to Iraq.”

14 On or about March 1, 2021, Williams participated in an online chat with CHS-4
15 and CHS-5 (the purported ISIS recruiters). Williams stated: “My passport will be ready
16 next month and I will be leaving for Iraq . . . to marry . . . and then probably *Sham* [Syria]
17 a few weeks after.” CHS-5 told Williams that his application had been “pre-approved”
18 by ISIS. CHS-5 further explained that Williams would still need to receive final approval
19 from ISIS and would first “need passport becaus[e] cant fli [sic] without that.” Williams
20 replied: “I will have passport in 1 month or 2 months.” Williams also stated that “there is
21 a brother who I am going to be living with and traveling with who wishes to file [an ISIS
22 application] as well,” referring to CHS-2. Williams then added CHS-2 to the group chat
23 and informed CHS-2 that he (Williams) had been approved for travel by ISIS.

24 On or about March 2, 2021, CHS-2 noticed that Williams had created a new social
25 media account and asked Williams why he had done so. Williams responded, “So I can
26 keep in touch with people when I leave.” During a conversation a few days later,
27 Williams told CHS-2 that his preferred destination for travel was Egypt, to fight for ISIS
28 in the Sinai desert. During the same conversation, Williams reiterated that if the

1 government prevents him from traveling overseas, he would be willing to do an attack in
2 the United States.

3 On March 6, 2021, Williams engaged in an online group chat with CHS-5, CHS-4,
4 and CHS-2. Williams stated that he expected to receive his passport within a month and
5 asked, “When I get my passport [] where am I supposed to travel too [sic]?” CHS-5
6 asked if Williams had a desired location. Williams answered: “I want to travel
7 somewhere with desert, like Sinai.” CHS-5 explained some of the challenges involved
8 with traveling to Sinai, and Williams replied: “Ask [the ISIS leaders] about Sinai, if I
9 cannot go to Sinai I will make a decision between Ethiopia, Somalia, or Indonesia.” The
10 group further discussed the timing of the arrival of Williams’ passport and that Williams
11 would wait to purchase an airline ticket until after the passport arrived. During the
12 conversation, CHS-5 told Williams that he had been communicating on the side with ISIS
13 authorities and that they would approve his travel to Sinai if that was where he wanted to
14 fight. Williams confirmed: “I wish for Sinai.”

15 On March 10, 2021, Williams made an in-person passport application at a post
16 office in Des Moines, Washington. At Williams’ request, CHS-2 drove Williams to the
17 post office and paid for the application (with funds provided by the FBI). Williams
18 arranged for the passport to be mailed to CHS-2 because Williams did not have a stable
19 residence. That same day, in an apparent effort to recruit CHS-2, Williams sent CHS-2 a
20 link to a website containing a large cache of ISIS videos, as well as a link to make
21 donations to ISIS-affiliated causes.

22 On or about March 10, 2021, Williams engaged in a group chat with CHS-2, CHS-
23 4, and CHS-5. Williams told the group, “I will have my passport within 4 to 6 weeks
24 they said, I will send photo of it when it arrives.” He later added, “We may receive it [the
25 passport] sooner than 2 months.” Williams asked, “Where do we go for the training?”
26 When CHS-5 responded, “Sinai,” Williams clarified, “Yes, Sinai, but I need to know
27 where I am supposed to go in Egypt, who will meet us, when he will meet us, things like
28 that.” As the conversation continued, CHS-5 asked, “I told you what others bring for

1 | hijrah?” Williams answered, “No you did not, can you tell me again so I can make a
2 | list.” CHS-5 described a list of items that Williams would need to acquire prior to his
3 | travel, including tactical gear, boots, and other items. Williams responded by sending
4 | pictures of a tactical vest and a solar-powered cell phone charger, asking if they were
5 | suitable. Williams further stated that he wanted to ensure the items he bought were “able
6 | to go on the flight with us, somethings [sic] you cannot take on the airplane.”

7 | On or about March 13, 2021, Williams spoke to CHS-2 about the items he needed
8 | to purchase for his planned trip. Williams said that he intended to sell his laptop
9 | computer, and possibly his cell phone, to help finance his travel. On March 15, 2021,
10 | FBI surveillance agents observed Williams walking into a pawn shop located in Federal
11 | Way, Washington. After Williams departed, agents interviewed employees at the pawn
12 | shop and learned that Williams had, in fact, pawned a laptop computer.

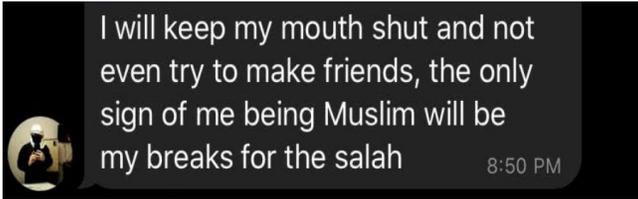
13 | On or about March 20-21, 2021, Williams engaged in an online group chat with
14 | CHS-5, CHS-4, and CHS-2. Williams told the group that he was having trouble
15 | purchasing the items he needed for his trip due to financial issues. Williams also stated
16 | that he expected his passport would arrive “very soon . . . within 3 weeks.” In terms of
17 | the timing of his travel, Williams stated: “I still need clothing, he [CHS-2] needs to pay
18 | off his loan, we need to buy plane tickets.”

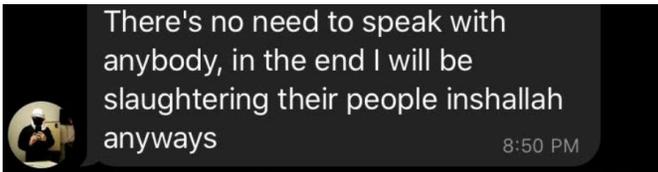
19 | During early April 2021, Williams obtained a job at a local food processing plant.
20 | He later told CHS-2, CHS-4, and CHS-5 that he was working for the specific purpose of
21 | raising the funds needed to support his planned trip, including the purchase of necessary
22 | items and an airplane ticket.

23 | On April 4, 2021, Williams had a text message exchange with CHS-2. Williams
24 | stated: “FBI IS AFTER ME APPEARENTLY [sic].” Along with this message, Williams
25 | forwarded an article about an American couple who were arrested at an airport
26 | attempting to join ISIS in Yemen. CHS-2 replied, “Believe me nobody after you, you
27 | just overthinking and don’t believe the rumors.” Williams responded, “Okay, I just don’t
28 | want to find out at the airport and be taken away. If I find out before, I can get approval

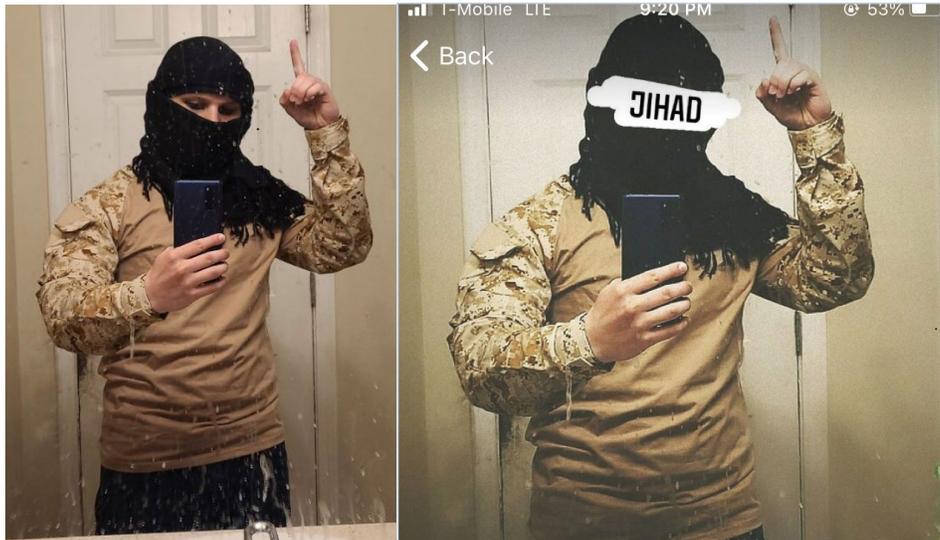
1 | for an *istshhadi* [suicide] operation here, but I will just take your advise [sic] and ignore
 2 | it,” referring to CHS-2’s assurances that nobody was “after” Williams. Williams later
 3 | explained that his concern about the FBI came from a recent conversation he had with his
 4 | mother, who said the FBI was looking for him. Williams ultimately dismissed the
 5 | concern, stating his mother was drunk and there was nothing “real about the FBI story.”

6 | In early April 2021, Williams engaged in an online group chat with CHS-5, CHS-
 7 | 4, and CHS-2. Williams initially contacted CHS-4 asking, “Where do we go, I need to
 8 | know so I know how much for the flight ticket.” CHS-4 encouraged Williams to eat well
 9 | and stay in shape for the trip. Williams answered, “Too poor, but this is why I have the
 10 | job, so I can afford some food and things, buy the ticket, and leave.” Williams then
 11 | returned to his earlier question: “We need to know which country or and city to take a
 12 | flight too [sic] though. I don’t want to spend any unnecessary time here. . . . I need to
 13 | know the location so I know the cost.” Williams later reiterated to CHS-5: “Passport will
 14 | come in 2 weeks or more []. I need to know where we must go so I can buy the plane
 15 | ticket. I am currently working and need to know how much money I must make to afford
 16 | the ticket.” CHS-5 replied: “This is good news. . . . I don’t know the city because
 17 | approval has to come once passport comes. . . . It is safe to have 1,000-1,500 amerikan
 18 | dollars for flight.” Williams replied: “Okay, well *insha’allah* [God willing] it comes very
 19 | soon. It should be here this month.” Williams also stated: “I will be working for around
 20 | 2 months until I have money for ticket, extra clothing, and to give leftover money to the
 21 | *wilayat* [Islamic State] when I arrive.” Referring to Williams’ job, CHS-4 urged, “Don’t
 22 | let them talk down to you,” Williams responded:

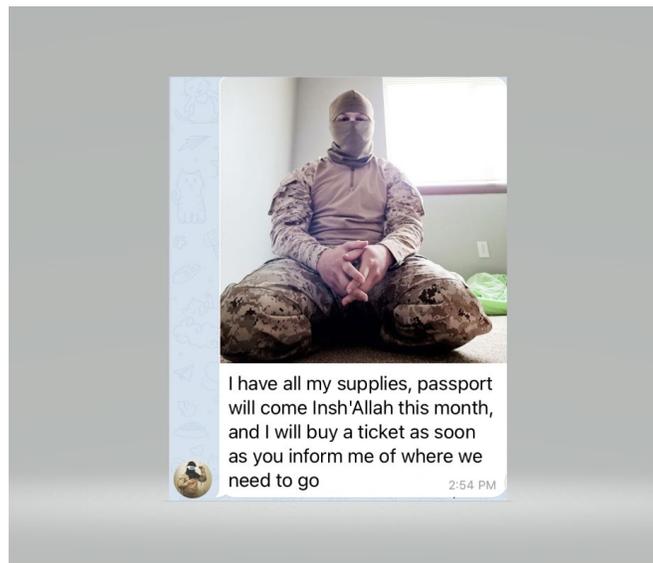
23 |  I will keep my mouth shut and not
 24 | even try to make friends, the only
 25 | sign of me being Muslim will be
 26 | my breaks for the salah 8:50 PM

27 |  There's no need to speak with
 28 | anybody, in the end I will be
 slaughtering their people inshallah
 anyways 8:50 PM

1 During April 2021, Williams worked steadily. On April 25, 2021, Williams
2 reported to CHS-2 that he had used the funds from his first paycheck to purchase items
3 for his trip. Williams sent CHS-2 the following images of himself in camouflage gear
4 that he had purchased online:

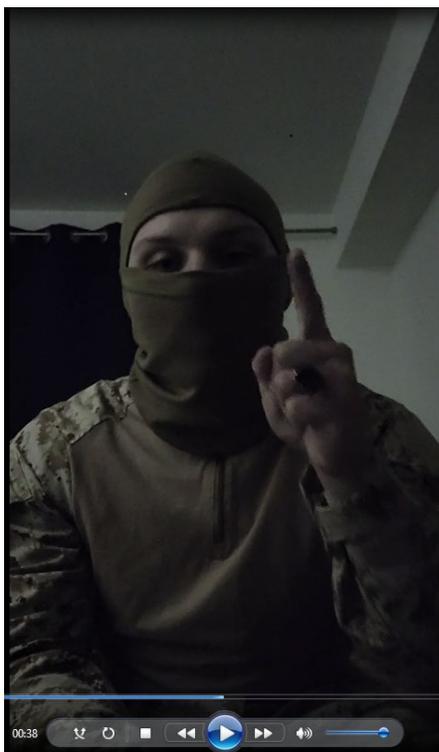


14 On or about April 24, 2021, Williams engaged in an online chat with CHS-5,
15 CHS-4, and CHS-2. Williams sent CHS-5 the below photograph of himself kneeling and
16 wearing military fatigues, with the message below:



27 During the same conversation, Williams stated: “For what better victory in the
28 way of our lord except death,” and included a smiling emoji.

1 On April 26, 2021, Williams met with CHS-2. Williams told CHS-2 that he had
 2 prepared a video and sent it to another person in Kazakhstan to be published online after
 3 he became a martyr. Williams provided CHS-2 with a copy of the video. The video is
 4 approximately one minute in length. A screen capture of the video is shown below, along
 5 with a transcript of Williams' narration:



19 *Have you not forgotten that the Lord said he will punish you for not going*
 20 *forth in the cause of Allah? When you are called to protect your brothers*
 21 *and sisters and your kilafah, you are sitting here posting only words. I*
 22 *want to see your actions. We want to see your actions. Allah (swt) wants*
 23 *to see your actions. Where are you? Where are you, oh mujahideen? . . .*
 24 *Many of you sit here just joking with each other, posting memes, sending*
 25 *videos. Nothing but posers, LARPer [live action role play] and wanna-be*
 26 *mujahideen. Many of you – a great deal of you – I have seen post your*
 27 *daily lives, showing your weaponry and your wealth and your*
 28 *vehicles. Yet, I do not see the blood on them. Why is that? If you are true*
and sincere in what you say, we would hear about such attacks
happening. We would see the blood on your knives, on the bumpers of your
cars, and on the barrels of your guns. So why do we not? Look in yourself
and ask if I am sincere to Allah, or I am just posing for others. Do I live for
the aqeedah or I seek fame and fortune, only in this dunya.

1 On April 26, 2021, Williams spoke with CHS-2 about his recent, unsuccessful
2 attempt to convince one of his friends, who Williams described as having access to
3 firearms, to commit an attack (with Williams) on a Seattle gay pride event. Williams
4 complained that the friend was not agreeing to participate. The relevant portion of the
5 conversation is transcribed below:

6 **Williams:** And this is what I asked him about. “Why don’t we do an *ishtihadi*
7 [suicide] operation.” I already asked him about it before. “Come on do it with me.
8 Let’s go fucking do the gay pride parade in downtown Seattle.” It’s one of the
9 biggest pride parades in the United States. Plus, after COVID hits, there is going
to be tons of people wanting to go to the gay pride parade.

10 **CHS-2:** What’s that pride parade?

11 **Williams:** Where the faggots do their march.

12 **CHS-2:** Pride parade? What is that?

13 **Williams:** Gay pride parade where the faggots they do . . .

14 **CHS-2:** Gay. Ohhhh.

15 **Williams:** And it’s a straight drive! So, if we get a semi-truck, we can drive
16 all the way through the parade and not have to stop once. Literally, [a] semi
17 will go through everything. And then we can get out and shoot (laughs).
18 And I told him about that and I showed him the map and everything. And I
19 was like, “What’s your excuse? Come on man, let’s do it.” And he was
20 like, “No, no I want to make hijrah.” But instead he is getting married and
moving states.

21 **CHS-2:** Does he still talk to you or no?

22 **Williams:** He has blocked me on [social media].

23 **CHS-2:** Ya.

24 **Williams:** You know, this is like I said. For the most part, all these people
25 are being like mendacious. They are just sitting there. You know, I feel
26 like I am one of the only ones that is actually sincere. I don’t want to say
27 they are not sincere in their hearts but if they were sincere in their hearts,
28 they would at least behave like it. So, they just sit there, post memes, and
take everything like a big joke.

Williams Finalizes his Travel Plans

1
2 On May 6, 2021, Williams sent a text message to CHS-2 stating, “I’m a try and get
3 in touch with [CHS-5] about the passport today.” Later that day, Williams’s passport was
4 delivered to CHS-2’s residence. CHS-2 sent a text message to Williams advising him
5 that the passport had arrived. Williams responded, “Send picture,” with a smiling emoji.
6 Williams added, “Send picture akhi so I may send it to [CHS-5].”

7 Later on May 6, 2021, during a group chat with CHS-2, CHS-4, and CHS-5,
8 Williams said: “Passport is here . . . I look super weird in the photo.” Williams then sent
9 a photograph of his passport. Williams told CHS-5: “[I] will have money for plane ticket
10 next Friday [May 14], I have all my supplies ready, now I have my passport.” As the
11 group chat continued, Williams added, “[E]verything is well, I am just ready to leave *dar*
12 *al kuffar* [land of the non-believers]. . . . I can hardly wait, I wish to make my lord smile
13 upon me.” As the others expressed approval, Williams stated: “I wanted to remind I wish
14 to die in the battlefield. I feel slightly uncomfortable with detonating myself as there is a
15 slight disagreement, but if I am told to blow myself up for my brothers and for the sake of
16 Allah I will.” Williams further stated, “I wish to see the kuffar as I kill them, I want to
17 strike terror in them and make Allah pleased for doing so.”

18 Williams then began to discuss the logistics of his upcoming travel: “As I said, I
19 have all the supplies ready, I have the passport, and I will be able to buy a ticket by next
20 Friday. I am just waiting on which country we need to buy a ticket for, and instructions
21 on where to go.” CHS-5 responded, “Where do u want to go *akhy* [brother]?” Williams
22 responded, “Sinai, but I need instructions on which city to travel too [sic], and who I will
23 contact to bring me to the *wilayat* [Islamic State].” CHS-5 asked Williams when he
24 wanted to leave, and Williams responded, “As soon as possible, I will be able to leave
25 and get on a plane in weeks.” Williams continued to ask about the details of his travel:
26 “Do I need to go somewhere specific or I can just fly to Cairo and a brother can bring me
27 to the *wilayat* [Islamic State]?” CHS-5 confirmed that Cairo was an appropriate
28 destination. Williams responded, “I will message you with the date in a few hours.”

1 Approximately three hours later, Williams stated in the group chat, “I am leaving
2 on the 28th. I will arrive May 29th at 11:10 p.m. in Cairo. The airport is Cairo
3 International Airport.” As the group continued to discuss next steps, Williams added,
4 “Okay, the ticket has been purchased, I am ready.”¹⁷ Williams forwarded his travel
5 itinerary to CHS-2. Williams’ flight is scheduled to depart Sea-Tac Airport on May 28,
6 2021, at 1:35 p.m., flying through Amsterdam and Paris, and ultimately to Cairo.
7 Williams selected the date of travel and specific flight itinerary on his own accord.

8 On May 6, 2021, at Williams’ request, CHS-2 drove Williams to get a single-shot
9 COVID vaccine in anticipation of his foreign travel.

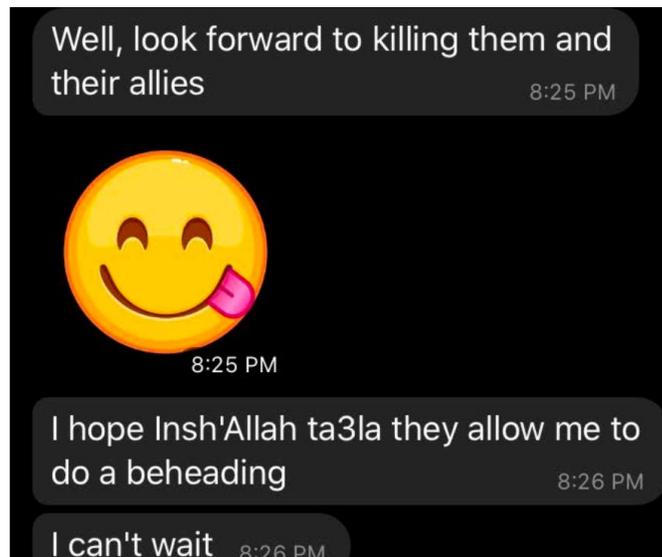
10 On or about May 8, 2021, Williams participated in an online conversation with
11 CHS-5 and CHS-2. Williams confirmed that CHS-2 would be traveling with Williams on
12 the same flight. CHS-5 advised Williams that the ISIS contact in Cairo was aware of
13 Williams’ itinerary and would be at the airport to meet them upon arrival. CHS-5 also
14 told Williams to “look like a tourist” when he travels and to tell Customs that he is
15 “going to visit pyramids.” CHS-5 said he would provide further details closer to the date
16 of travel.

17 On or about May 9, 2021, Williams told CHS-2 that he planned to give his
18 employer notice that he would quit his job in two weeks. Williams said he already paid
19 his friend \$200 for a portion of the cost of his airplane ticket to Cairo and that he still
20 owed the friend \$780. Williams further stated that after he receives his final paycheck,
21 he would be able to pay the friend in full. That same day, CHS-2 received a text message
22 from Williams asking if CHS-2 was excited about their upcoming travel to Cairo. CHS-2
23 stated that he was excited, and asked: “How about you?” Williams replied: “I am very
24 excited, just think I may get detained at the airport.”

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28 ¹⁷ Although his initial remarks during the group chat suggested that Williams intended to wait until May 14 to buy his plane ticket, Williams later explained to CHS-2 that he convinced a friend to allow him to use the friend’s credit card to purchase the plane ticket, promising to reimburse the friend. As a result, Williams was able to buy the ticket earlier.

1 On May 13, 2021, Williams and CHS-2 discussed how early they should arrive at
 2 the airport on May 28th. Williams said, “Let’s go five hours early, I don’t want to run
 3 into trouble.” CHS-2 agreed, and then Williams stated, “Especially if the FBI wants to
 4 come and speak, it could take hours.” Williams then suggested that they get a motel
 5 room the night before the flight, explaining, “[We] go there the day before and just go,
 6 walk into the airport.” CHS-2 agreed to this plan.

7 On or about May 17, 2021, Williams and CHS-4 engaged in a conversation via
 8 encrypted messaging app. Williams said he was at the gym with his roommate and
 9 added, “We are standing around here and I look like I’m ready to bomb the place.
 10 Hahahahaha.” CHS-4 commented, “My stomach is turning . . . stupid ass Israelis just
 11 angers me.”¹⁸ Williams answered:



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 21 Williams added, “I make sincere *dua* [prayer] you can leave to serve your lord
 22 soon . . . May Allah reward us both, and both grant us *shuahdah* [martyrdom].”

23 On May 19, 2021, Williams met with CHS-2. Williams told CHS-2 that he was
 24 excited to travel to Sinai and was counting down the days. Williams explained that the
 25 friend who paid for his plane ticket “knows 100%” why Williams is travelling overseas,
 26
 27

28 ¹⁸ This was a comment about the ongoing military clashes between Hamas and the State of Israel that began in May 2021.

1 and that he is the only one whom Williams had told about his plans to travel to join ISIS.
2 Williams told CHS-2 that when they arrive in the Sinai, they will likely be sent to
3 Palestine/Gaza to fight with the Palestinians due to current events. Williams also advised
4 CHS-2 to watch a You Tube video on how to assemble and disassemble weapons, stating
5 that would likely be their first type of training at the ISIS training camp.

6 On May 22, 2021, Williams met with CHS-2. CHS-2 asked Williams if he
7 planned to say goodbye to any family members or friends prior to his travel, or whether
8 he planned on just “disappearing.” Williams said that he planned to say goodbye to his
9 mother. Later in the conversation, Williams expressed concern that he was “a little bit
10 suspicious” of CHS-5 and explained some of his reasons, including that CHS-5 allowed
11 Williams to choose his own destination of travel (Sinai). Among other things, Williams
12 expressed the concern that: “In the U.S. [law enforcement] can do anything they want. ...
13 This is why they make you hijrah, fake hijrah, and then they put you in the prison, where
14 you stay. . . . That’s why they built Guantanamo Bay outside of the U.S. They didn’t
15 put it, the prison, where they can keep the terrorists inside the U.S. Otherwise, they
16 would have to follow the law of the U.S.” In response, CHS-2 told Williams that CHS-5
17 seemed “legit.”

18 During the same meeting, Williams and CHS-2 watched several violent ISIS-
19 related videos that Williams accessed over the internet. While they viewed the videos,
20 Williams stated, “Man, I really want to behead the, they make me executioner.” CHS-2
21 asked, “You want to beheading people? Are you full okay with that? Are you okay with
22 blood?” Williams replied, “Yeah, 100%, man. . . . But, yeah, I really want to. Like, I
23 don’t want to do *ishtihadi* [suicide attack]. I don’t want to, you know. . .” CHS-2
24 finished Williams’s sentence with: “Bomb yourself?” Williams replied, “I would prefer
25 to kill them.” CHS-2 asked, “Is it like beheading?” Williams responded, “Either way, it
26 doesn’t bother me.”

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1 On or about May 23, 2021, Williams participated in an online conversation with
2 CHS-5 and CHS-2. Williams told CHS-5 that he had “been working out again and trying
3 to get prepared for the training camp.” Williams reaffirmed, “I am ready.” CHS-5
4 advised Williams: “This is the time some brothers choose to back out. I want to make
5 sure you know that if u decide not to make hijrah it is no problem. Need to make sure u
6 are fully committed now.” Williams replied: “Back out? Never, why would I back out of
7 attaining *jannah* [eternal paradise]? There is nothing greater than fighting and dying in
8 the cause of Allah.” CHS-5 directed the same question to CHS-2, who replied, “I won’t
9 say no to [CHS-5].” CHS-5 then gave Williams specific instructions on how to navigate
10 through the airport in Cairo and meet up with the ISIS contact. Williams sent a
11 photograph of himself (with his face obscured) and stated, “This is what I will be
12 wearing.” The photo depicted Williams wearing a t-shirt and blue jeans, consistent with
13 the prior instructions he received from CHS-5 to “look like a tourist.”

14 On or about May 24, 2021, Williams participated in an online conversation with
15 CHS-5 and CHS-2. CHS-5 provided Williams with further instructions on how to meet
16 up with the ISIS contact at the Cairo airport. CHS-5 also confirmed that Williams had
17 final approval from ISIS leadership for “hijrah.” Williams replied: “[T]hank you so
18 much brothers [heart emojis]. You do not understand how happy I am rn [right now]?”
19 CHS-5 instructed Williams that he should not have any further communications with
20 CHS-5 or CHS-4 prior to his travel unless there was an emergency.

21 On May 25 and 26, 2021, Williams visited with his mother. Afterwards, Williams
22 explained to CHS-2 that he (Williams) told his mother that he was going on a trip to
23 Egypt to “see the pyramids” and would be returning home several days later.

24 On May 27, 2021, at approximately 8:30 p.m., Williams and CHS-2 checked into
25 a motel nearby Sea-Tac Airport, as Williams previously had suggested. While at the
26 motel, Williams viewed an ISIS video over his smartphone and discussed the upcoming
27 trip with CHS-2. Among other things, they discussed how difficult the ISIS training
28 camp would be, with CHS-2 commenting, “Maybe they’re gonna test us there.”

1 Williams stated, "I already told them what I want to do." CHS-2 replied, "Yeah, but
2 that's gonna be different because it's gonna be face-to-face. It's not like messaging."
3 Williams stated, "I just want my lord to smile upon me." CHS-2 asked, "How's that
4 gonna happen, man?" Williams replied, "Through my death, *Inshallah* [God willing]."
5 CHS-2 asked Williams who his "biggest enemy" would be, and Williams replied: "The
6 firmest of believers, you will find them, they have the most animosity towards the Jews."
7 Williams later commented: "I finally don't have to act socially acceptable."

8 **The Arrest of Williams at Sea-Tac Airport**

9 On May 28, 2021, Williams, accompanied by CHS-2, went to Sea-Tac Airport
10 consistent with his travel plans. Williams checked in for his flight to Cairo and was
11 arrested at approximately 1:00 p.m. after he presented his boarding pass at the gate and
12 attempted to board the flight.

13 FBI agents advised Williams of his *Miranda* rights. Williams waived those rights
14 and agreed to speak with the agents. During the post-arrest interview, Williams
15 identified himself as a member of the "Islamic State" (ISIS). Among other things,
16 Williams stated that it was his "obligation" to do "hijrah" and to travel to a country that
17 practices Sharia law. When asked by agents what his role was going to be when he
18 arrived, Williams stated that he would be an "executioner" or a "machinegunner." Later
19 during the interview, Williams stated: "My intent was to make hijrah. It doesn't matter
20 what you guys do to me. I get rewarded for it." Williams further stated, "Dude, you
21 either leave – it's hijrah or jihad – or prepare explosives here." Williams explained: "I
22 want to die. We love our deaths more than you love your lives." Williams also said that
23 his only message to the U.S. government was: "Go to hell."

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1 **Conclusion**

2 Based upon the foregoing and my training and experience, I respectfully submit
3 there is probable cause to believe that Elvin Hunter Bgorn Williams committed the
4 offense set forth above in this Complaint.

5 
6 _____
7 DAVID NARRANCE
8 Special Agent, Federal Bureau of Investigation

9 The above agent provided a sworn statement attesting to the truth of the contents
10 of the foregoing affidavit on the 28th day of May, 2021. Based on the Complaint and the
11 sworn statement, the Court hereby finds that there is probable cause to believe the
12 Defendant committed the offense set forth in the Complaint.

13 
14 _____
15 BRIAN A. TSUCHIDA
16 Chief United States Magistrate Judge