

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America  
v.

Case No. 18-6588-HUNT

TAYYAB TAHIR ISMAIL,

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 01/01/2018-12/12/2018 in the county of Broward in the Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 842 (p)(2)	Distributing Information Pertaining to the Manufacture or Use of an Explosive, Destructive Device, or Weapon of Mass Destruction.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Complainant's signature

Special Agent Matthew Z. Schempp, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/13/18

Judge's signature

City and state: Fort Lauderdale, Florida

Honorable Patrick M. Hunt, U.S. Magistrate

Printed name and title

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Special Agent Matthew Z. Schempp of the Federal Bureau of Investigation (hereafter FBI), being duly sworn, hereby depose and state the following:

**INTRODUCTION**

1. This affidavit is submitted in support of a criminal complaint and arrest warrant for Tayyab Tahir ISMAIL (hereinafter "ISMAIL").

2. Based on my training and experience, and the facts contained below, I submit there is probable cause to believe that ISMAIL knowingly distributed information pertaining to, in whole or in part, the manufacture or use of an explosive, destructive device, or weapon of mass destruction, with the intent that the information be used for, or in furtherance of, an activity that constitutes a federal crime of violence, in violation of 18 U.S.C. § 842(p)(2).

3. I am a Special Agent with the FBI, assigned to the FBI's Miami Field Office. I have been employed by the FBI since August 2014, and have served in the Miami Field Office for the entirety of that time subsequent to the completion of my training. For the past two years, I have been assigned to the Joint Terrorism Task Force in the Miami Field Office. As an FBI Agent, I have been the case agent for, or participated in, numerous counterterrorism investigations, to include serving as a case agent for a mass casualty terrorism investigation of a suspected homegrown violent extremist that resulted in a successful prosecution of the subject. During the course of these investigations, I have examined materials posted on the Internet by terrorist organizations; reviewed emails, blogs, and other Internet-based communications authored and maintained by members and supporters of terrorist organizations; conducted or participated in surveillance; the drafting and execution of arrest and search warrants; and, the debriefing of

informants and undercover employees. Through my training, education, and experience, I have become familiar with the manner in which individuals engaged in terrorist activity operate and communicate, and some of the methods that are used to conceal evidence of participation in terrorist activity.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement personnel, and witnesses. Unless otherwise noted, wherever in this affidavit I recount a statement, including written statements made by another person, that statement is recounted in relevant part. Statements in quotation marks are based on preliminary transcriptions, review, or interpretations of communications, all of which may be subject to revision.

5. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, it does not include each and every fact observed by me or known to the government. I have set forth only those facts necessary to support a finding of probable cause.

#### **SUMMARY OF THE EVIDENCE**

On at least five occasions in or around July, August, and September 2018, ISMAIL posted bomb making instructions on a Mobile Messaging Platform. ISMAIL was a member of various rooms within the platform and each of these rooms contained members who support violent jihad. Investigators compared the Google searches by ISMAIL to the activity that he then conducted in the Mobile Messaging Platform. On many occasions, a Google search was done and then within minutes, the same material was posted to the platform. The evidence described below details how this investigation has revealed that ISMAIL is the user of various email addresses, the creator and user of one Website and the individual who posted the bomb making instructions.

**RELEVANT LAW**

6. Title 18, United States Code, Section 842(p) (2) provides that:

It shall be unlawful for any person to distribute by any means information pertaining to, in whole or in part, the manufacture or use of an explosive, destructive device, or weapon of mass destruction, with the intent that the information be used for, or in furtherance of, an activity that constitutes a federal crime of violence.

The term “explosive” means gunpowders, powders used for blasting, all forms of high explosives, blasting materials, fuzes (other than electric circuit breakers), detonators, and other detonating agents, smokeless powders, other explosive or incendiary devices.

The term “destructive device” means any explosive, incendiary, or poison gas, including, but not limited to, a bomb or grenade.

The term “weapon of mass destruction” means any destructive device; any weapon that is designed or intended to cause death or serious bodily injury through the release, dissemination, or impact of toxic or poisonous chemicals, or their precursors; any weapon involving biological agent, toxin, or vector; or any weapon that is designed to release radiation or radioactivity at a level dangerous to human life.

18 U.S.C. § 842(p)(2).

**PROBABLE CAUSE**

**Background**

7. ISMAIL was born on December 29, 1984, in Pakistan, and he is a naturalized United States citizen. ISMAIL resides in the Southern District of Florida.

8. The FBI initially became aware of an individual later identified as Tayyab Tahir ISMAIL (hereinafter “ISMAIL”) in October 2010 when a complainant reported to the FBI that ISMAIL had made terroristic threats at a homeless shelter. Specifically, ISMAIL allegedly stated the government kept Americans drugged to keep them unaware of what the government was doing. ISMAIL stated he was an “Al Qaeda soldier” and used the phrase, “blow it up.” When ISMAIL

was insulted by a female, he stated “we throw women like her in the ditch.” Finally, he reportedly discussed how to make a bomb with baking soda, metal, a battery, and water in a jar.

9. Between July 2015 and April 2016, ISMAIL was a close associate of James Gonzalo Medina. On April 29, 2016, Medina was arrested for attempting to use a weapon of mass destruction and his target was a synagogue in Aventura, Florida. He was ultimately sentenced to 25 years in prison. Prior to Medina’s arrest, he had been homeless and ISMAIL provided him a place to live. During that time, ISMAIL and Medina engaged in a number of conversations about radicalization and other related topics. ISMAIL repeatedly provided dogmatic justification for violent jihad and even conducted firearms training with Medina.

10. In June 2015, during the investigation that led to Medina’s arrest, ISMAIL discussed with a reliable FBI confidential human source (hereinafter, “CHS”) his disdain for the United States and his desire to travel to and live in “the Caliphate” after its creation. Based on my training and experience, I recognize that during the summer of 2015, “the Caliphate” to be a reference to the designated foreign terrorist organization (hereinafter “FTO”) known as the Islamic State in Iraq and al Sham (hereinafter “ISIS”). ISMAIL repeatedly referred to Anwar al-Aulaqi<sup>1</sup> as a hero, noted that he regularly listened to al-Aulaqi’s lectures, and stated his desire to travel to conduct jihad at some point in time. ISMAIL also described jihad as an Islamic duty, stating that “hypocrisy is when one refuses to go to jihad.” He later stated he believed in following the “Prophet’s” wish to die performing jihad. Notably, ISMAIL voiced support for ISIS, stating they

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<sup>1</sup> Anwar al-Aulaqi was an extremist ideologue and a leader in al Qaeda in the Arabian Peninsula (hereinafter “AQAP”), an al Qaeda affiliate located in Yemen, who was killed in a United States drone strike in Yemen in late-September 2011. Al-Aulaqi was a prolific producer of English-language jihadist propaganda, which, even after his death, continues to inspire individuals to participate in violent jihad.

did good things in Syria and that he had considered joining ISIS. He discussed ISIS fulfilling prophecies about reestablishing the Caliphate and described westerners as “kuffar,”<sup>2</sup> comparing them to animals.

11. At the time, ISMAIL was in possession of multiple firearms, which Medina initially planned to use in his attack against the synagogue. Aware of the weapons potentially accessible to Medina, investigators directed to suggest that Medina consider his (Medina’s) alternate plan of using a weapon of mass destruction instead of firearms.

12. On the day Medina attempted to bomb the synagogue, ISMAIL learned of Medina’s plans to move forward and conduct the attack, but he did not alert law enforcement. After Medina’s arrest, law enforcement requested that ISMAIL voluntarily surrender his firearms, and he complied. During their interaction with ISMAIL, agents obtained a cellular telephone number to contact him. As of the date of this affidavit, law enforcement is still in possession of ISMAIL’s weapons.

13. In December 2017, ISMAIL returned to the United States from Pakistan. During an interview upon his return, law enforcement discovered that ISMAIL possessed three digital copies of Dabiq magazine, an online English language propaganda product published by ISIS.

ISMAIL’s Use of Google Website and Email Accounts

14. In July 2015, while discussing his desire to participate in global jihad with a CHS, ISMAIL directed the CHS to a website, [https://\[REDACTED\]](https://[REDACTED]) (hereinafter the “Website”). ISMAIL noted that he had created the Website and controlled access

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<sup>2</sup> “Kuffar” is a transliterated Arabic term used to define non-Muslims; the term is derogatory in nature and essentially refers to non-Muslims as disbelievers.

to it. According to ISMAIL, the Website contained various items of jihadi propaganda. An FBI review of the Website revealed dozens of links to issues of ██████<sup>3</sup>, Dabiq, and other publications either run by or directly supporting FTOs (including ISIS); hadiths supporting violent jihad coupled with commentary by ISMAIL; links to al Qaeda training manuals; videos of jihadi operations; and scores of additional links to sites devoted to violent jihad. According to Google records, the Website was established on or about July 25, 2014, and was affiliated with Google email account user201406280102@gmail.com (hereinafter "Email#1").

15. Also in 2015, the FBI learned ISMAIL utilized email address tayyab254@gmail.com (hereinafter "Email#2"). ISMAIL provided Email#2 on his United States passport application. Pursuant to Google records, Email#2 was created on or about May 30, 2007, and was still active as of November 4, 2018. A user of Google accounts normally has access to several Google Services, including but not limited to: Gmail, Google Docs, Google Drive, Google Searches and Google Sites.

#### ISMAIL's Use of Mobile Messaging Applications

16. In or about early November 2018, the FBI conducted an open source search of a known mobile messaging platform (hereinafter "MMP") and identified a mobile messaging account (hereinafter "MMA1") tied to ISMAIL's known telephone number.<sup>4</sup> Based on a review of reporting provided by an FBI employee acting in an undercover capacity (hereinafter "UC-1") regarding the MMP, the FBI located another mobile messaging account (hereinafter "MMA2")

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<sup>3</sup> ██████ is an English language jihadi propaganda magazine produced by AQAP, an FTO.

<sup>4</sup> As indicated above in paragraph 9, the FBI was in contact with ISMAIL and obtained a telephone number he utilized. In or around November 2018, telephone company records confirmed that ISMAIL continued to subscribe to and utilize the known telephone number.

believed to be utilized by ISMAIL. The investigation has revealed that the user of MMA2 posted links to the Website on at least two separate occasions to private, encrypted chat rooms, as detailed below. Further, the username affiliated with MMA2 is similar to other usernames known to be utilized by ISMAIL. Given MMA1's affiliation with ISMAIL's known telephone number and MMA2's multiple references to the Website, I submit there is reason to believe ISMAIL is the user of both MMA1 and MMA2. In addition, as detailed in paragraphs 23 and 24, the user of MMA2 and Email#2 (ISMAIL's true name email account) concurrently conducted nearly identical activities online, thereby corroborating the reasonable belief that ISMAIL is the user of MMA2.

Evidence that ISMAIL is the user of Emails 1-3 and the Website

17. On or about December 4, 2018, Google provided transactional information indicating Email#1, Email#2, and user201806090055@gmail.com (hereinafter "Email#3"), among other email accounts not referenced herein, were linked by account cookie information. Based on my training and experience, I have knowledge that providers such as Google use cookies and similar technologies to track users visiting Google's webpages and using its products and services. Basically, a "cookie" is a small file containing a string of characters that a website attempts to place onto a user's computer. When that computer visits again, the website will recognize the cookie and thereby identify the same user who visited before. This sort of technology can be used to track users across multiple websites and online services belonging to Google. More sophisticated cookie technology can be used to identify users across devices and web browsers. Based upon this, there is reason to believe that the same person is the user of all three email accounts and the Website. Further, based upon ISMAIL telling the CHS that he created and controlled the Website, there is reason to believe that ISMAIL is the user of all of these email accounts and Website.

ISMAIL's Google Searches

18. On December 11, 2018, investigators received the results of a search warrant to Google for the activity of ISMAIL. On or about January 1 and 2, 2018, according to a review of Google records related to Email#2, ISMAIL conducted a series of searches, to include: (a) searching for "hadith justifying terrorism," then visiting a website purportedly providing the religious foundations of suicide bombings; (b) searching for "James Medina," then visiting websites containing stories of Medina's arrest; (c) searching for "providing material support to a foreign terrorist organization," then visiting the Cornell Law website which outlines United States Code; and (d) searching for "charged with having extremist views," then visiting websites pertaining to Anjem Choudary<sup>5</sup>, Omar Mateen<sup>6</sup>, and the individual convicted of plotting to behead conservative blogger Pamela Geller<sup>7</sup>. ISMAIL conducted further searches for Geller, to include voter registration information in Florida and New York, both states wherein Geller has lived.

19. A review of Google records related to Email#2 further revealed ISMAIL's support of ISIS, to include hundreds of internet searches for ISIS propaganda, radical jihadi scholars, methods of sharing illegal documents/technical security, and methods of violence, to include bomb making instructions, suicide vest instructions, vehicle-born improvised explosive device manufacturing instructions, and firearms rentals. More searches were conducted for hadiths

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<sup>5</sup> In or around July 2016, Anjem Choudary was convicted in a British court for inviting support to ISIS.

<sup>6</sup> On or about June 12, 2016, Omar Mateen conducted a terrorist attack at a gay club in Orlando, Florida, killing 49 people. During the attack, Mateen pledged allegiance to ISIS.

<sup>7</sup> In or around October 2017, David Wright was convicted of plotting to behead Pamela Geller on behalf of ISIS. Geller was targeted based on her sponsoring of "Draw Prophet Mohammad" contests. Based on training and experience, Your Affiant knows it is against Islam to depict the Prophet Mohammad, and Geller's contest were seen as a direct affront to Islam.

justifying violent jihad, terrorism, hostage taking, and in some cases violence specifically targeting women and children of “kuffar.” In many instances, ISMAIL visited the web pages which were produced as a result of the searches. The following are limited, characteristic examples of the terms searched: On January 1, 2018, ISMAIL searched for “hadith justifying terrorism”. On January 11, 2018, ISMAIL searched for “abu chemical bomb manual pdf”. On June 9, 2018, ISMAIL searched for “sahaba<sup>8</sup> permitted killing women and children”. On June 16, 2018, ISMAIL searched for “al Qaeda training manual”. On July 16, 2018, ISMAIL searched for “how to build suicide bomb vest”, “suicide vest instructions” and “car bomb instructions” within approximately a one hour period.

20. Continued review of Google records revealed in December 2017, while in Pakistan and in the days immediately following his return to the United States from Pakistan, ISMAIL conducted a series of internet searches. Based on training and experience, Your Affiant knows the content of these searches (weapons research, research into the dogmatic permissibility of killing civilians within Islam, and research into canceling subscription services and the elimination of debt, pursuant to final judgement as a Muslim) to be topics consistent with pre-operational steps taken before a terrorist act. Specific search terms included: On December 26, 2018, ISMAIL searched for “black flags best weapons in the world islam,” “hadith killing civilians,” “how to cancel amazon fresh,” “how to cancel itunes,” “how to cancel la fitness,” and “how will debt be judged on judgement day [REDACTED]<sup>9</sup>.”

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<sup>8</sup> Based on my training and experience, I know the “sahaba” to be the companions of the Prophet Mohammad, and understands that the practices of the sahaba are considered especially ordained within Islam, based on their close association with the Prophet Mohammad.

<sup>9</sup> Based on my training and experience, I know [REDACTED] is a website which provides questions and answers in accordance with Salafi school of thought within Islam. Salafism is considered the most conservative view of Islam.

ISMAIL on Mobile Messaging Platform

21. ISMAIL, utilizing MMA2, participated in numerous encrypted chat rooms on MMP. I conducted a review of UC-1 reporting pertaining to three specific chat rooms, described below, in which ISMAIL prolifically posted content in support of violent jihad, ISIS, and FTOs:

a. Mobile Messaging Room 1 (hereinafter “MMR1”) is a pro ISIS, and ISIS affiliates, chat room which includes posts of ISIS news publications and videos, justifications for jihad, photographs of fighters, and bomb-making instructions. ISMAIL, using MMA2, is the most prolific poster within MMR1. The FBI assesses that as of in or about November 2018, more than 50% of the over approximately 3,000 posts in this chat room were made by ISMAIL using MMA2.

b. Mobile Messaging Room 2 (hereinafter “MMR2”) is a pro ISIS chat room which includes posts of ISIS news publications, justifications for jihad, encouragement to conduct jihad, and safety instructions for dealing with explosives. ISMAIL’s participation in MMR2 is detailed below.

c. Mobile Messaging Room 3 (hereinafter “MMR3”) is supportive of ISIS and other jihadist groups. While many of the posts were made in a foreign language, English language posts consisted of reports from battlefields from the jihadist group’s perspective, publications from jihadist groups, justifications for violent jihad, and bomb-making instructions. ISMAIL’s participation in MMR3 is detailed below.

22. According to a review of UC-1 reporting, ISMAIL, using MMA2, posted the following:

- a. On or about July 1, 2018, in MMR3, ISMAIL posted a link to the Website titled, "[REDACTED]"<sup>10</sup> and "[REDACTED]."
- b. On or about July 29, 2018, in MMR1, ISMAIL posted a link to the Website titled, "[REDACTED]."
- c. On or about September 18, 2018, in MMR1, ISMAIL posted a photo of New York's Statue of Liberty being targeted by ISIS in a drone attack.
- d. On or about September 28, 2018, in MMR2, ISMAIL shared a message which, in part, stated the following: "To all our brethren who live in Dar al-kuffur and who can not make hijra to the Islamic state...strike the enemy in their own land of infidelity...Kill them where you will with them...Remember our brothers who responded to the call in the West and Europe – in Orlando Florida in the country that leads the cross-coalition where more than 50 sodomites were eliminated<sup>11</sup>...You are surrounded by methods to hit them...Kill the devil's soldiers without hesitation. Make them bleed even in their own homes...Have multiple tools on hand – strike crowds – gatherings – parties – public squares – all places where the kuffar concentrate to transgress – take a car and roll them without fear – take a knife and make them bleed as many as possible – hit them with a strong Explosion...There are plenty of methods to attack my brother – Take poison in injections and enter malls and inject products with poison – At night come out and cause the fire of houses...take a gun and go away and attack Like a sniper to the whole kuffar within reach..."

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<sup>10</sup> Based on my training and experience, I am aware that the "Islamic State" is another name used to identify ISIS.

<sup>11</sup> Based on training and experience, Your Affiant believes the reference to the "sodomites" killed in Orlando, Florida, to be a reference to the terrorist attack conducted by Omar Mateen at Pulse nightclub – a gay club – in June of 2016.

23. A comparison of UC-1 reporting documenting ISMAIL's activity using MMA2 with Google records related to Email#2, revealed ISMAIL, while using Google services related to Email#2, researched propaganda, then, using MMA2, posted the propaganda to the listed MMR in a matter of minutes. His activity included, but was not limited to, the following:

a. On or about July 12, 2018, at approximately 10:34 p.m. UTC, ISMAIL visited the website [REDACTED]. Approximately seven minutes later, ISMAIL, using MMA2, posted the same to the website, titled [REDACTED],<sup>12</sup> as well as a PDF of the document, to MMR3. At the beginning of the document, al-Aulaqi wrote, "Jihad today is obligatory on every capable Muslim. So as a Muslim who wants to please Allah it is your duty to find ways to practice it and support it." For example, in addition to wanting to become a martyr, al-Aulaqi suggested supporting jihad through fundraising/financing, providing moral support, encouraging others to fight, protecting the mujahideen training, etc.

b. On or about July 12, 2018, at approximately 10:55 p.m. UTC, ISMAIL searched for "39 Ways To Serve and Participate in Jihad" and visited related websites. Approximately nine minutes later, ISMAIL, using MMA2, posted a document titled "[REDACTED].pdf" to MMR3.

c. On or about July 14, 2018 at approximately 5:44 a.m. UTC, ISMAIL visited the website [REDACTED]. [REDACTED]. Approximately three minutes later, ISMAIL, using

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<sup>12</sup> "Awlaki" is a known alternate spelling for "Aulaqi," as previously identified herein.

MMA2, posted a nearly identical website and the document titled, "[REDACTED]  
[REDACTED]"<sup>3</sup> to MMR3.

d. On or about July 16, 2018, at approximately 7:02 a.m. UTC, ISMAIL searched for "at-tibyan permissibility suicide," then visited the website

[REDACTED]  
[REDACTED] Approximately 46 minutes later, ISMAIL, using MMA2, posted the same website and the document titled "[REDACTED]  
[REDACTED]," to MMR3.

e. On or about July 18, 2018, at approximately 7:44 a.m. UTC, ISMAIL searched for and visited the website [REDACTED]  
[REDACTED]

Approximately one minute later, ISMAIL, using MMA2, posted a document titled "[REDACTED]  
[REDACTED].pdf,"<sup>15</sup> to MMR3.

f. On or about July 18, 2018, at approximately 8:10 a.m. UTC, ISMAIL searched for and visited the website [REDACTED]  
[REDACTED]

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<sup>13</sup> Based on training and experience, Your Affiant knows [REDACTED] is a pro-Islamic State Ebook; the subtitle states, [REDACTED]." The contents include a history of global jihad written from the perspective of jihadis, as well as information on physical fitness training, operational security recommendations for evading detection, and methods for conducting terrorist attacks.

<sup>14</sup> Based on training and experience, Your Affiant believes "[REDACTED]  
[REDACTED]," published by [REDACTED], is a document which provides the Islamic justification for the permissibility of martyrdom operations. Its synopsis states, "... martyrdom operations are permissible, and in fact the Mujahid who is killed in these is better than the one who is killed fighting in the ranks, for there are degrees even amongst the martyrs, corresponding to their role, action effort, and risk undertaken."

<sup>15</sup> Based on my training and experience, I understand "[REDACTED]" to be an approximately 44 page English-language document on how to recruit secular and moderate Muslims into the global jihadist movement.

[REDACTED]. Approximately eight minutes later, ISMAIL, using MMA2, posted a document titled [REDACTED] the West.pdf,<sup>16</sup> to MMR3.

ISMAIL's Posting of Bomb-making Instructions

24. Continued comparison of UC-1 reporting documenting ISMAIL's activity using MMA2 with Google records related to Email#2 revealed ISMAIL, while using Google services related to Email#2, researched bomb-making instructions, then, using MMA2, posted the bomb-making instructions to the MMR on the same date. Specifically:

a. On or about July 15, 2018, at approximately 11:10 p.m. UTC, ISMAIL searched for and visited the website, [REDACTED]

[REDACTED] Approximately 27 minutes later, ISMAIL, using MMA2, posted the same link to MMR3; the underlying document was titled, [REDACTED] Course By [REDACTED]<sup>17</sup> (May Allah have Mercy upon him) Published [REDACTED] [REDACTED] Media Front." The FBI notes that ISMAIL included an alternative link PDF file for download, [REDACTED] [REDACTED] (hereinafter "Alternative Link"). On or

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<sup>16</sup> Based on my training and experience, I understand "[REDACTED] [REDACTED]," to be a pro ISIS guide which provides explicit instructions to Islamic extremists living in the west. The introduction states, "Being an undercover agent requires knowledge and skills. IN this book, you will be taught these skills. YOU will be taught; how to live a double-life, how to keep your Secret life private, how to survive in a threatening land, how you can Arm and strengthen the Muslims when the time for Jihad comes to your country, and neighborhood. In simple terms, from this guide book – you will learn how to become a Sleeper-cell which activates at the right time when the Ummah needs you." The guide includes instructions for evading detection in person and online, physical training, weapons/tactics training, and bomb-making.

<sup>17</sup> Abu Khabbab al Misri was allegedly an explosives expert for al Qai'da.

about November 21, 2018, the FBI queried the open source internet for Alternative Link (described above in paragraph 22(a)). The Google site revealed that "[REDACTED]" was posted on or about July 15 by Email#3, the same month and day ISMAIL (a) researched the document using Google services related to Email#2, and (b) posted the same document in MMR3 using MMA2.

b. On or about July 16, 2018, at approximately 12:50 a.m. UTC, ISMAIL searched for and visited the website [REDACTED]. At approximately 5:06 a.m. the same day, ISMAIL, using MMA2, posted the website [REDACTED] to MMR3.

c. On or about July 16, 2018, at approximately 5:28 a.m. UTC, ISMAIL searched for "[REDACTED] version 2000," then immediately visited a related website. At approximately 5:37a.m. UTC the same day, ISMAIL, using MMA2, posted the document [REDACTED].pdf" to MMR3.

i. Approximately 44 minutes later, ISMAIL posted a website link for an article titled, "[REDACTED]," then listed the following description of the video, "The video shows how to build the bomb vest [REDACTED], a plastic explosive that has military and construction applications. It is a favorite of terrorists due to its light weight and ease of concealment. The Libyan operatives who destroyed Pan Am Flight

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<sup>18</sup> Based on my training and experience, I understand [REDACTED], is a book that contains instructions for the manufacture of explosives and related weapons.



b. On or about August 23, 2018, prior to ISMAIL's posting of the bomb-making instructions, another member of MMR1 had posted a message referencing a speech given by ISIS leadership. The member stated, "When you compare speeches by Islamic State leaderships and [other known FTOs] you see speech by Islamic State is so balanced. It has hope for Muslims in general. It has promise of tests and victories for mujahideen of Islamic State. It has Dawah to tribes and other among rebels who are weakening Jihad and Khilafah. It has incitement for Muslims towards Jihad. It has threats for Kuffar and Murtadeen. It has encouragement for Muslims who are supporting Islamic State through media. It has something for whole world in it..."

c. Also on August 23, 2018, ISMAIL posted, within MMR1, an audio speech given by Abu Bakr al-Baghdadi, the known leader of ISIS, titled "[REDACTED]" Based on my training and experience, I understand that within the speech, al-Baghdadi called upon individuals to recommit to a true passion for martyrdom, and urged ISIS' followers in the United States to conduct attacks. ISMAIL also posted a "ruling on one who seeks to divide the muslims when they are united," which stated, "Kill all of them. I heard the messenger of Allah say: When you are holding to one single man as your leader, you should kill who seeks to undermine your solidarity or disrupt your unity."

d. Further, in the hours after posting the bomb-making instructions on August 23, 2018, ISMAIL posted multiple messages explaining the rewards a martyr would receive after their death, to include but not limited to a place in Paradise, forgiveness of sins, and 72 wives. ISMAIL also posted "[REDACTED]," described in footnote 16 above. The cover of "[REDACTED]" states, "[REDACTED]" Based on my

training and experience, I understand the “crusader armies” to be a reference to the armies of Western nations, including the United States.

26. A review of UC-1 reporting further revealed that, on or about September 17, 2018, at approximately 3:27 p.m. UTC, ISMAIL, using MMA2, posted a video depicting step-by-step instructions on how to construct a bomb in a kitchen to MMR1. An FBI review of the video revealed the instructor in the video wearing a black balaclava to conceal his face and camouflage military fatigues. Throughout portions of the video, a small graphic of a black flag generally synonymous with ISIS is visible in the corner of the video. Based on my training and experience, I believe the above referenced video was likely a segment from a longer video titled, “[REDACTED].” In addition to the bomb-making tutorial, the unabridged video contained various demonstrations on how to kill victims face to face; various individuals appear to be murdered during the production of these demonstrations.

a. On or about September 22, 2018 (within a week of posting the bomb-making instructions referenced above in paragraph 26), ISMAIL posted, in MMR1, a video titled “[REDACTED].” Based on my training and experience, I understand this video was published by [REDACTED], a known ISIS media outlet. A review of the video revealed an Arabic speaker calling upon jihadis in Europe, the United States, and elsewhere, to launch attacks against civilians. The video depicted numerous violent terrorist attack scenes, to include severed heads; the subtitles read, “[REDACTED] watch them die.”

27. Based on my training, experience, and review of MMR1, I understand the other members of MMR1 to be supporters of ISIS and violent jihad. Therefore, I submit there is cause

to believe ISMAIL posted the bomb-making instructions intending the instructions be used to conduct a crime of violence in support of ISIS and violent jihad.

Expert Opinion Provided by the FBI Explosives Unit

28. On or about December 7, 2018, FBI explosives examiners provided professional opinions regarding the explosives instructions posted by ISMAIL. According to the information provided, [REDACTED] was previously been evaluated by the Explosives Unit. It contains numerous discussions related to explosives production, incendiary materials, and explosives or incendiary device construction. Several of the formulations or recipes for explosives are viable. “[REDACTED]” also contains information on the construction of Improvised Explosive Devices (IEDs) also known as homemade bombs or destructive devices. Many of the IED discussion sections provide accurate directions to construct a viable IED, or parts of an IED; however many safety steps are omitted or not covered by the author. Properly constructed, assembled and initiated the IEDs covered in these discussions can cause property damage, bodily injury or death.

29. Regarding the other written instructions posted by ISMAIL, on or about December 7, 2018, qualified FBI Explosives Examiners reviewed the following material from a reference database maintained by the FBI Laboratory Explosives Unit: “[REDACTED]” [REDACTED] “[REDACTED]” by [REDACTED], and [REDACTED]. Each of the referenced documents contains potentially valid instructions for the manufacture of an explosive material. Each of the referenced documents also contains potentially valid instructions for the construction of an improvised explosive device (IED) or an improvised incendiary device, also known as destructive devices. Many of the IED discussion sections provide accurate directions to

construct a viable IED, or parts of an IED; however many safety steps are omitted or not covered by the author. Properly constructed, assembled and initiated the IEDs covered in these discussions can cause property damage, bodily injury or death.

ISMAIL'S Advice on Evading Law Enforcement Detection

30. Google records and UC-1 reporting revealed ISMAIL utilized multiple methods in order to communicate in a manner ISMAIL believed would hide his true identity in order to evade detection by law enforcement. Such methods appear to include but were not limited to using MMA2, Tor<sup>21</sup>, VPNs<sup>22</sup>, and possibly non-attributable devices, in accordance with guidance provided by ISIS. For example:

a. On or about September 17, 2018, ISMAIL, using MMA2, posted a document to MMR1 detailing how "mujahideen" can reach "maximum privacy within [MMP]." ISMAIL posted screenshots of what appear to be pages within the document; the text recommends alternatives to MMP for secure messaging on Android and iOS devices, to include Chatsecure. According to the posted screenshot, Chatsecure is a free and open source messaging app that provides encryption and allows the user to securely connect to existing Google accounts.

b. On or about September 17, 2018, according to a review of Google records, ISMAIL searched for, "how to use chatsecure," then watched a You Tube video. ISMAIL also

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<sup>21</sup> Based on my training and experience, I know TOR is an Internet privacy tool that is designed to stop people, including government agencies and corporations, from learning the user's location or tracking the user's browsing habits.

<sup>22</sup> Based on my training and experience, I understand a Virtual Private Network (VPN) to be a private and secure environment within the Internet itself which allows one to send and receive messages and data while maintaining the privacy and secrecy of a private network. Further, I understand those who utilize VPNs believe they are able to browse completely anonymously online and access otherwise unavailable content.

searched for “secure encrypted vpn chat rooms,” then visited the website [REDACTED]

c. On or about September 21, 2018, ISMAIL, using MMA2, posted the following to MMR2: “I have TOR. Download TOR app to cover your tracks, to cover your IP address. Insha’ Allah<sup>23</sup>. Also APK app to change permissions on all apps to keep them from taking your information...You can get free fake phone number from Google voice. And you can use [another Mobile Messaging Platform] on Desktop using TOR or VPN to hide IP address tracks. Insha’ Allah.” ISMAIL then encouraged others to “check out” a named group on MMP that is affiliated with [REDACTED].<sup>24</sup>

d. On or about October 5, 2018, ISMAIL conducted a series of searches for “tracfone,” “fake phone number,” “no contract mobile,” and “iphone app for setting app permissions.”<sup>25</sup> Subsequent to ISMAIL’s October 5<sup>th</sup>, 2018, searches and continuing to present, Google records do not reveal further searches related to violent jihad nor ISIS propaganda.

31. Based on my training and experience, I have knowledge that individuals engaged in criminal activity utilize multiple methods in order to communicate in a manner believed to be not directly attributable to the individual in order to evade detection by law enforcement. Additionally, such individuals utilize deliberate tools and techniques to disseminate contraband

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<sup>23</sup> “Insha’ Allah” is a common, transliterated Arabic expression meaning “Allah willing,” or “If Allah wills it.” Based on my training and experience, I understand the use of the expression connotes a fundamental tenet of Islam, that everything occurs according to Allah’s will.

<sup>24</sup> Based on my training and experience, I understand ISIS media releases describe [REDACTED] goal is “unifying technical and security efforts, and uniting the ranks of the mujahideen’s supporters.”

<sup>25</sup> Based on my training and experience, I understand that enabling or disabling application permissions within a mobile device will either allow or disallow the application to retain certain types of information from the mobile device.

materials. Further, based on my training and experience, I understand that ISIS, through EHF and other publications, has provided detailed guidance on the secure use of encrypted mobile messaging platforms to its consumers with the objective of enabling them to evade law enforcement scrutiny supporting terrorist actions. Specifically, Your Affiant submits ISMAIL's stated actions indicate his intent to (a) use encryption to evade law enforcement, and (b) teach and encourage others to use encryption to evade law enforcement.

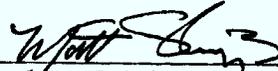
**CONCLUSION**

32. Based on the above, I submit there is probable cause to believe that ISMAIL, in the Southern District of Florida, and elsewhere, knowingly distributed information pertaining to, in whole or in part, the manufacture or use of an explosive, destructive device, or weapon of mass destruction, with the intent that the information be used for, or in furtherance of, an activity that constitutes a federal crime of violence, in violation of 18 U.S.C. § 842(p)(2).

**[SPACE INTENTIONALLY LEFT BLANK]**

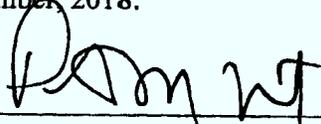
33. Accordingly, your affiant respectfully requests that the Court issue a criminal complaint and arrest warrant for ISMAIL.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Matthew Z. Schempp  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed to me this 13<sup>m</sup> day of December, 2018.



HONORABLE PATRICK M. HUNT  
UNITED STATES MAGISTRATE JUDGE