

# Exhibit A

AAS:CRH  
F.# 2017R01183

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

17-769 M

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COMPLAINT

UNITED STATES OF AMERICA

AFFIDAVIT IN SUPPORT  
OF ARREST WARRANT

- against -

RASHEEDUL MOWLA,

Cr. No.  
(T. 18, U.S.C., § 2339B(a)(1))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ELIZABETH MILLER, being duly sworn, deposes and states as follows:

ATTEMPT TO PROVIDE MATERIAL SUPPORT  
TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION

Upon information and belief, on or about and between June 1, 2017 and June 16, 2017, both dates being approximate and inclusive, within the Eastern District of New York and within the extraterritorial jurisdiction of the United States, the defendant, RASHEEDUL MOWLA, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in 18 U.S.C. § 2339A(b), including personnel, including MOWLA himself, to a foreign terrorist organization, to wit: the Islamic State of Iraq and al-Sham (“ISIS”), which has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act.

(Title 18, United States Code, Sections 2339B(a)(1) and 3551 et seq.)

FACTUAL ALLEGATIONS

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation's ("FBI") New York Joint Terrorism Task Force ("JTTF"). I have been an FBI Special Agent since 2015. As a Special Agent, I have investigated national security matters, and I have conducted physical surveillance, executed court-authorized search warrants and used other investigative techniques to secure relevant information. As a result of my training and experience, I am familiar with the tactics, methods and techniques of terrorist networks and their members, including the use of computers, cellphones, social media, email, and the Internet in connection with criminal activity. My responsibilities include investigation of terrorist activity by various designated foreign terrorist organizations such as ISIS.

2. I have personally participated in the investigation of the offense discussed below. I am familiar with the facts and circumstances of this investigation from: (a) my personal participation in this investigation; (b) interviews with witnesses; (c) my review of records and reports generated by other law enforcement agents in the United States and elsewhere; (d) my review of communications recovered during the investigation; and (e) information provided to me by other agents and law enforcement officials. Where statements

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<sup>1</sup> Because the purpose of this complaint is to provide only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

of others are set forth, except as otherwise noted, they are set forth in sum and substance and in part.

3. JTTF is investigating RASHEEDUL MOWLA (“MOWLA”), and others known and unknown, for providing, conspiring to provide, and attempting to provide material support and resources to the Islamic State of Iraq and al-Sham (“ISIS”).

4. ISIS is a foreign terrorist organization that, since 2013, has claimed credit for numerous terrorist activities, including seizing Mosul, a city in northern Iraq, launching rocket attacks on eastern Lebanon in March 2014, the November 2015 terrorist attacks in Paris, France, and the March 2016 suicide bombings in Brussels, Belgium, among many others. These terrorist activities are part of ISIS’s broader goal of forming an Islamic state or “caliphate”<sup>2</sup> in Iraq and Syria. On or about October 15, 2004, the United States Secretary of State designated al- Qaeda in Iraq (AQI), then known as Jam ‘at al Tawid wa’ al-Jahid, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (“ISIS” – which is how the FTO will be referenced herein), The Islamic

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<sup>2</sup> “Caliphate” is a term that can be used to refer to ISIS’s self-proclaimed system of religious governance, with Abu Bakr al-Baghdadi as the caliphate’s self-proclaimed leader.

State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

5. RASHEEDUL MOWLA is a 21 year-old male who resides in Brooklyn, New York.

6. On or about June 1, 2017, MOWLA traveled to Saudi Arabia, together with other individuals, ostensibly to celebrate an Islamic religious holiday.

7. The investigation has revealed that MOWLA and another individual were detained in a country bordering Syria (the “Middle East Country”) soon after MOWLA traveled to Saudi Arabia.

8. MOWLA was deported from the Middle Eastern Country on August 29, 2017, and arrived at JFK Airport at approximately 5:00 p.m. that same evening.

9. Shortly after MOWLA’s arrival, FBI agents conducted an interview of MOWLA. The interview was audio recorded. After waiving his Miranda rights orally and in writing, MOWLA made the following admissions, in sum and substance, and in part:<sup>3</sup>

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a. MOWLA admitted that he was attempting to travel to Syria to join ISIS shortly after he traveled to Saudi Arabia on June 1, 2017, when he was caught in the Middle Eastern Country bordering Syria.

b. MOWLA admitted that, prior to traveling to the Middle East, MOWLA knew ISIS was a terrorist organization, had previously heard reports on ISIS in the news, and knew ISIS members killed people and that ISIS committed terrorist attacks.

c. Although MOWLA initially claimed he only wanted to travel to Syria to live under ISIS's self-declared caliphate, he subsequently admitted that, had he successfully arrived in Syria to join ISIS, MOWLA was willing to fire weapons against others on behalf of ISIS and planned to die on behalf of ISIS.

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WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant RASHEEDUL MOWLA so that he may be dealt with according to law.

S/ Elizabeth Miller

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ELIZABETH MILLER  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
30<sup>th</sup> day of August, 2017

S/ James Orenstein

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THE HONORABLE JAMES ORENSTEIN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK