

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

UNITED STATES OF AMERICA

v.

Case Number 3:16cr70/MCR

ROBERT B. JACKSON
_____ /

FACTUAL BASIS FOR GUILTY PLEA

The defendant admits that if this case were to proceed to trial, the government could prove the following facts.

On or about October 3, 2014, the FBI conducted an open source review of the Facebook profile ‘Abdur Rashid Bin Jackson’ (Facebook ID 100008289079159), which was identified as posting comments expressing support for extremist terrorist groups such as the Islamic State of Iraq and the Levant (ISIS or ISIL). During the review, it was observed that on the morning of September 19, 2014, the user of ‘Abdur Rashid Bin Jackson’ posted a picture of the ISIL flag. Another Facebook user posted the question “Are you isis?” to which ‘Abdur Rashid Bin Jackson’ replied “...I am not ISIS, though I wish I could help.” Also observed on the ‘Abdur Rashid Bin Jackson’ “likes” page were the groups ‘Islamic State of Iraq and the Levant’ and ‘Al-Shabaab.’ ISIL and Al-Shabaab are designated as Foreign Terrorist Organizations by the United States Department of State. On the evening

of September 19, 2014, an unidentified Facebook profile sent Jackson a link to the video "Flames of War," an ISIL propaganda video, which was publicly displayed on Jackson's Facebook wall. Subsequent investigation of public Facebook photographs and open source records showed the photographs matched Robert Blake Jackson, a resident of Pensacola, FL.

On or about January 29, 2015, a telemarketing corporation located in Pensacola, Florida, reported they recently fired an employee named Robert Blake Jackson for viewing ISIL related and other terrorist related websites and videos on his work computer, which was a violation of company policies. Other employees, including those who sat in close proximity to Jackson, observed that Jackson spent a lot of time at work searching for topics relating to terrorism and extremist groups. One employee stated "everything he (Jackson) viewed was on ISIS," and that he also showed a particular interest in any news and video regarding ISIL actions with Japanese prisoners they captured. The telemarketing corporation provided a detailed list of internet searches performed by Jackson. Topics searched included 'ISIS news,' 'al Qaeda news,' 'abu musab al-zarqawi,' 'charlie hebdo,' 'terrorism news,' 'most inspiring anwar al awlaki lecture,' and 'anwar al awlaki lectures on youtube.' Employees also observed Jackson signing into and utilizing the Facebook profile 'Abdur Rashid Bin Jackson.'

On June 3, 2015, Robert Blake Jackson was interviewed by FBI agents in

Pensacola, FL. During the interview, while describing his personal background, Jackson stated he uses the alias 'Abdur Rashid.' Further, Jackson explained he uses the alias in electronic communications, and he provided an email address of xxxxxxxxxxxx8585@gmail.com to the interviewing agent. At this point in the interview, Jackson was admonished regarding Section 1001 of Title 18, United States Code, and was advised it is illegal to provide false information to federal agents. Jackson was then asked what content he posts on Facebook, and he replied he has made posts regarding the Koran and the book "Milestones" by Sayyid Qutb. Jackson was asked if he posted anything regarding violent extremism or radical groups, and Jackson stated he posted a picture of a black and white flag, but "not the ISIS flag." Jackson specifically stated he never posted anything pro-ISIS, that he is not pro-ISIS, and that he made no online comments espousing anything violent.

During the aforementioned June 3, 2015, interview by agents, Jackson also stated that while he was employed at the above telemarketing corporation, he utilized the internet to only search news sites, and nothing else. This is directly contradicted by witness accounts as well as forensic evidence. That is, a forensic review of Jackson's use of the telemarketing corporation's digital media confirmed he accessed multiple sites and Youtube videos involving ISIL related and terrorism related material.

Sometime before the June 3, 2015, interview, Jackson's Facebook profile was

deactivated involuntarily, but upon said interview he stated that he did not receive an explanation from Facebook regarding the deactivation. When questioned regarding the deactivated Facebook profile, Jackson surmised it was deactivated because he had many Facebook friends who were from the Middle East, but again reiterated that he made no comments espousing violence or extremism. Jackson advised the interviewing agent that he had created a new Facebook profile to replace the deactivated profile.

On July 17, 2015, the FBI conducted an open source review of Facebook and found a new profile bearing the name ‘Abdurrashid Al Amriki’ (Facebook ID 100009452466992), which displayed a photograph of Jackson as the profile picture and a comment posted on April 22, 2015, stating “...I’ve returned to Facebook. Insha’alla I will not have this one compromised for reasons inexplicable.”

On September 29, 2015, a search warrant was authorized by United States Magistrate Judge Elizabeth M. Timothy and served on Facebook for records pertaining to Facebook accounts ‘Abdur Rashid Bin Jackson’ and ‘Abdurrashid Al Amriki’. A review of the records provided by Facebook, which included content from the above referenced accounts, revealed that Jackson posted the following comments and items on his Facebook profile *before* he was interviewed by the FBI on June 3, 2015 (this is a small sample):

- a. On or about May 23, 2014, Jackson posted the comment “Alhamdulillah!

May Allah (swt) bless these future lions of jihad, Inshallah!”

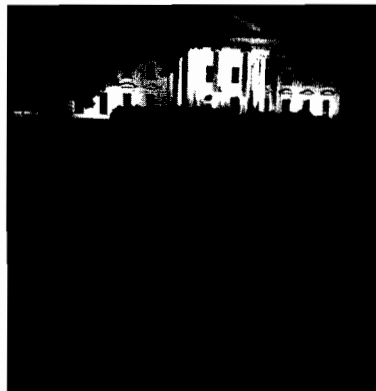
b. On or about August 27, 2014, Jackson wrote to another Facebook user “..Akhi, I merely wanted to thank you for your valiant work against the vile and utterly evil yahudi scum. In shallah you sent as many jews as possible unto the maw of the hellfire....Alhamdulillah Hamas and the Qassam brigades do not bend unto the horrendous will of the jews- unlike Fatah.”

c. On or about September 19, 2014, Jackson posted the below image:



Another Facebook user posted a comment to this image asking “Are you isis?” to which Jackson replied, “No akhi I am not ISIS, though I wish I could help.”

d. On or about September 27, 2014, Jackson posted the below image of the ISIL flag being held up in front of the United States White House:



e. On or about November 10, 2014, Jackson commented on an image and wrote “Inshallah America and it’s coalition burns in the hellfire. May the Islamic State bury these idiots in Bilad al Sham. All of this infuriates me; however- it is prophecy that iymahs near, yes??”

f. On or about January 10, 2015, Jackson posted the comment “May ‘Charb’ burn in the Hellfire and the kuffar acquire some measure of decency and respect.” This posting relates to the murder of members of the French media working at Charlie Hebdo.

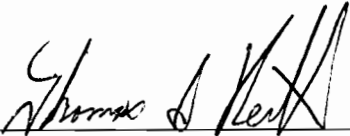
g. There were multiple instances wherein Jackson “liked” ISIS, ISIL, and Hamas. All are designated Foreign Terrorist Organizations.

Facebook records capturing the Internet Protocol (IP) addresses used to access the ‘Abdur Rashid Bin Jackson’ profile showed two IP addresses that were routinely used: 68.1.93.225 and 68.1.96.250, which were maintained by Cox Communications. A grand jury subpoena served on Cox Communications showed the referenced IP addresses were assigned to the defendant’s residence.

On July 28, 2016, Jackson was arrested on a criminal complaint for the instant offense. In an audio and video recording, Jackson admitted making the charged material false statements to the FBI.

Elements of the Offense

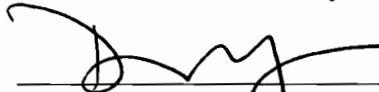
1. The defendant made the statements as charged,
2. The statements were false,
3. The falsity concerned a material matter,
4. The defendant acted willfully, knowing that the statements were false, and
5. The statements pertained to a matter within the jurisdiction of a department or agency of the United States.



THOMAS S. KEITH
Assistant Federal Public Defender
Florida Bar No. 0243078
3 West Garden Street, Suite 200
Pensacola, Florida 32502
(850) 432-1418

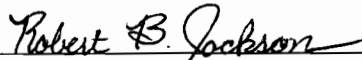
9/23/16
Date

CHRISTOPHER P. CANOVA
United States Attorney



DAVID L. GOLDBERG
Assistant U.S. Attorney
Northern District of Florida
Member of the Maryland Bar
21 East Garden Street, Suite 400
Pensacola, Florida 32502
(850) 444-4000

9/23/16
Date



ROBERT B. JACKSON
Defendant