

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 17-CR-20595

v.

Hon. Marianne O. Battani

YOUSEF MOHAMMAD RAMADAN,

Defendant.

_____ /

**MOTION TO SUPPRESS STATEMENTS
OBTAINED IN VIOLATION OF YOUSEF RAMADAN'S FIFTH
AMENDMENT AND DUE PROCESS RIGHTS**

Defendant Yousef Mohammad Ramadan, by his attorneys, Andrew Densemoo and Colleen Fitzharris, moves to suppress the statements he made to federal agents while in custody at the airport pursuant to Fed. R. Crim. P. 12(b)(3)(C), the Fifth Amendment, and *Miranda v. Arizona*, 384 U.S. 436, 444–45 (1966). In support of this motion, Mr. Ramadan states the following:

1. Mr. Ramadan is charged with two counts of knowing possession of a firearm with an obliterated serial number in violation of 18 U.S.C. § 922(k).
2. To protect this privilege, government agents must remind people of their rights to remain silent and to counsel before initiating a custodial interrogation. The

government may not use any statements given without these procedural safeguards.

Miranda v. Arizona, 384 U.S. 436, 444–45 (1966).

3. The government may not compel testimonial, incriminating statements either. *United States v. Hubbell*, 530 U.S. 27, 34–38 (2000).
4. Mr. Ramadan’s statements to federal agents were involuntary. He gave them in an isolated room, without the benefit of *Miranda* warnings, after he repeatedly requested a lawyer and said he did not wish to speak to the agents. In addition, agents handcuffed him, assaulted him, and told him that he had no right to refuse to answer questions or to a lawyer.
5. Once Mr. Ramadan requested a lawyer’s assistance during this in-custody interrogation, all questioning should have ceased. *Edwards v. United States*, 451 U.S. 477, 484–85 (1981). Instead, federal agents told Mr. Ramadan that he had no right to counsel and persisted in asking for his passwords and passcodes and about firearms.
6. Mr. Ramadan requests an evidentiary hearing to establish facts that will show his statements were not voluntary.
7. At the end of the hearing, this Court should suppress all statements Mr. Ramadan made to the federal agents. *See Wong Sun v. United States*, 371 U.S. 471, 486 (1963). Paragraphs 8, 10–11, and 14–18 of the affidavit for a search warrant are fruits of the illegal search because the agents asked Mr. Ramadan about the location of firearms depicted in the photos found on the hard drive. (*See Ex. A, Search Warrant.*)

8. The Assistant U.S. Attorney assigned to this case does not concur in this motion.

CONCLUSION

CBP agents interrogated Mr. Ramadan in violation of the Fifth Amendment privilege against self-incrimination and due process. All fruits seized as a result of this compelled disclosure must therefore be suppressed.

Dated: October 25, 2017

Respectfully Submitted,

FEDERAL DEFENDER OFFICE

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 17-CR-20595

v.

Hon. Marianne O. Battani

YOUSEF MOHAMMAD RAMADAN,

Defendant.

_____ /

**BRIEF IN SUPPORT OF YOUSEF RAMADAN'S
MOTION TO SUPPRESS STATEMENTS**

After TSA agents x-rayed Yousef Ramadan's luggage, they decided to pull him and his whole family from a flight to investigate why the bags contained armor and tasers. Various federal agents isolated the Ramadans in separate rooms. Once Yousef Ramadan had been separated from his family, federal agents placed him in a windowless room, assaulted, and placed in handcuffs. The agents grilled Mr. Ramadan about the contents of his bag, his beliefs, and the purpose of his travel. Yet they did not read Mr. Ramadan his *Miranda* rights. Ultimately, the agents extracted from Mr. Ramadan information about a storage locker. That storage locker was subsequently searched, and the government used the items found in that locker to charge Mr. Ramadan. Because Mr. Ramadan never received *Miranda* warnings and his statements were involuntary, those statements and the subjects of the search warrants must be suppressed.

I. BACKGROUND

On August 15, 2017, Yousef Ramadan, his wife, and his four children boarded a plane to travel to Jordan. From there, they planned to fly to Israel, where they intended to settle down so that Mr. Ramadan could care for his aging father. Mr. Ramadan checked a few bags. While x-raying the checked bags, TSA agents noticed armor, a taser, taser cartridges, a rifle scope, pepper spray, and two-way radios packed in some of the suitcases. Also in the checked luggage were three computers, a hard drive, five external hard drives, digital cameras, a DVD, a sim card, and four I-phones. CBP officers decided to pull Mr. Ramadan and his family from the plane for further questioning.

Four federal officers escorted Mr. Ramadan into an enclosed room in the North Terminal of the Detroit Metro Airport. They closed the door and began to ask questions.

No CBP officer read Mr. Ramadan his *Miranda* rights, and yet they began questioning him about the contents of his luggage and travel plans. Mr. Ramadan asked for an attorney and for the interrogation to be recorded. The agents refused both requests. The agents demanded that he tell them the passwords and passcodes to unlock the cell phones and computers. When he refused to provide such information, the agents told Mr. Ramadan that he had no choice but to turn over that information.

Frustrated by Mr. Ramadan's refusal to disclose his passwords and passwords or to grant access to the digital devices, the CBP agents tried to review the electronic media in any way they could. Only the external hard drives and flash drives were accessible.

During the search of these external hard drives, the agents discovered videos and photos they believed were ISIS propaganda videos, photographs of firearms and explosives. At some point during this questioning, the officers physically assaulted Mr. Ramadan and placed him in handcuffs. Mr. Ramadan repeatedly stated that he did not want to speak with the agents and that he wanted to speak to a lawyer. The agents told him that he did not have any rights at an international border, and so he had to speak to them and could not talk to a lawyer.

After viewing the photos and videos on the external hard drives, the agents questioned Mr. Ramadan about the contents of the various media, whether he knew how to make pipe bombs, and whether he supported the mission of ISIS. Mr. Ramadan made statements.

II. LEGAL STANDARD

The Fifth Amendment shields people from “be[ing] compelled . . . to be a witness against himself” in any criminal case. U.S. Const. amend. V. Its protections extend to compelled, testimonial, incriminating communications. *Hibel v. Sixth Judicial Dist. Court of Nevada, Humboldt Cty.*, 542 U.S. 177, 189 (2004). The privilege “not only extends to answers that would in themselves support a conviction under a federal criminal statute but likewise embraces those which would furnish a link in the chain of evidence needed to prosecute the claimant for a federal crime.” *Hoffman v. United States*, 341 U.S. 479, 486 (1951). “Compelled testimony that communicates information that may lead to

incriminating evidence is privileged even if the information itself is not inculpatory.” *United States v. Hubbell*, 530 U.S. 27, 38 (2000) (internal quotation marks omitted).

To protect the right against self-incrimination and the right to counsel, in *Miranda*, the Supreme Court held that law enforcement officers must give notice of these rights before interrogating him or her in custody. 384 U.S. at 478–79. Statements elicited in noncompliance with this rule generally may not be admitted into evidence in a criminal trial. *Id.* at 479; *Dickerson v. United States*, 530 U.S. 428, 435 (2000); *Stansbury v. California*, 511 U.S. 318, 322 (1994).

Although unwarned statements must be suppressed because they are presumptively coerced, *Oregon v. Elstad*, 470 U.S. 298, 307 (1985), but any fruit of *voluntary* statement made after *Miranda* warnings should not be excluded, *United States v. Patane*, 542 U.S. 630, 643 (2004). Involuntary statements and their fruit must always be excluded. *Id.* at 640 (“We have repeatedly explained that those subjected to coercive police interrogations have an *automatic* protection from the use of their involuntary statements (or evidence derived from their statements) in any subsequent criminal trial.” (internal quotation marks omitted)).

III. DISCUSSION

The tactics federal agents used to interrogate Mr. Ramadan were problematic for many reasons. They did not read him any *Miranda* warnings. They denied Mr. Ramadan’s repeated requests to speak to a lawyer. And they used aggressive questioning, handcuffs, physical abuse, and intimidation to overbear his will to remain

silent. Because the statements he made were involuntary, they and their fruits must be suppressed. Included among the fruits is any evidence seized pursuant to the search warrant for his storage unit, which referenced Mr. Ramadan's compelled statements.

A. CBP agents interrogated Mr. Ramadan in custody without providing proper *Miranda* warnings.

Mr. Ramadan's statements to CBP officers during the airport interrogation were the product of coercive questioning without *Miranda* warnings. An "interrogation" is "not only . . . express questioning, but also any words or actions on the part of the police that the police know are reasonably likely to elicit an incriminating response from the suspect." *Rhode Island v. Innis*, 446 U.S. 291, 301 (1980). A person is "in custody" if government agents formally arrest a person or restrain that person's "freedom of movement of the degree associated with a formal arrest." *Minnesota v. Murphy*, 465 U.S. 420, 430 (1984) (quotation marks and citations omitted). In the absence of a formal arrest, courts look at the totality of circumstances to determine whether a reasonable person would have felt "at liberty to terminate the interrogation and leave." *Thompson v. Keohane*, 516 U.S. 99, 112 (1995); *United States v. Swanson*, 341 F.3d 524, 528 (6th Cir. 2003). The Sixth Circuit has identified the following non-exclusive factors district courts should use to determine whether a person is "in custody":

- (1) the purpose of the questioning;
- (2) whether the place of the questioning was hostile or coercive;
- (3) the length of the questioning;
- and (4) other indicia of custody such as whether the suspect was informed at the time that the questioning was voluntary or that the

suspect was free to leave or to request the officers to do so; whether the suspect possessed unrestrained freedom of movement during questioning; and whether the suspect initiated contact with the police or acquiesced to their requests to answer some questions.

Swanson, 341 F.3d at 529 (internal quotation marks and alterations omitted). At the end of the day, the court must decide whether the facts and circumstances were “inherently coercive.” *Homes v. Fields*, 565 U.S. 499, 509 (2012).

Although routine questioning at the primary or secondary inspection at an international border does not qualify as an interrogation, *United States v. Galloway*, 316 F.3d 624, 628–32 (6th Cir. 2003), facts and circumstances of a secondary inspection may rise to the level of an in-custody interrogation, *see, e.g., United States v. Molina-Gomez*, 781 F.3d 13, 21–24 (1st Cir. 2015) (holding that questioning by CBP agents in a small, windowless room constituted an in-custody interrogation; *United States v. FNU LNU*, 653 F.3d 144, 154–55 (2d Cir. 2011) (acknowledging that whether questioning at the border ripens into an interrogation may turn on a holistic review of the facts); *United States v. Djibo*, 151 F. Supp. 3d 297, 305–06 (E.D.N.Y. 2015) (concluding that a man was “in custody” and should have been given *Miranda* warnings during questioning at a secondary inspection at an airport). *Molina-Gomez* and *Djibo* provide helpful illustrations of why Mr. Weikel was in custody when CBP agents demanded his passcode, and therefore should have been given *Miranda* warnings.

In *Djibo*, two CBP officers received information from a cooperator that the defendant was the intended recipient of two heroin deliveries. 151 F. Supp. 3d at 298–

99. The cooperator provided law enforcement officers with the defendant's phone number and even sent the defendant text messages at the agents' request to finalize the drug transfer. *See id.* at 299. Federal investigators notified CBP agents about the defendant's upcoming travel to the United Kingdom and instructed them to perform "a border enforcement exam" a few feet from the jet way. *Id.* The defendant completed a customs declaration form usually reserved for incoming travelers, and then CBP agents searched his bags, and discovered a number of cell phones. *Id.* At that point, the officers asked for the phone's number and passcode, which the defendant provided before he was arrested and read his *Miranda* rights. *Id.* at 299–300. CBP agents used the four-digit passcode to unlock the phone and search its contents on site. *Id.* at 300–01.

At the suppression hearing, the agents who accessed the phone described the search as a "peek" at emails, text messages, and undeleted content. *Id.* at 302–03. Even though the government agreed "to suppress the peek"—an apparent concession that the search was illegal—the district court analyzed whether the CBP officers obtained the passcode and all evidence found as a result of the passcode disclosure in violation of the Fifth Amendment and *Miranda*. *Id.* at 303. To start, the district court acknowledged that international travelers expect to answer questions and some constraints at any border, and therefore the risk a reasonable person may feel like he or she is under arrest is diminished. *Id.* at 305. But such a risk is not impossible, depending on the totality of circumstances. *Id.* The district court thus reviewed multiple factors—"the interrogation's duration; its location"; "whether the suspect volunteered for the

interview; whether the officers used restraints; whether weapons were present and especially whether they were drawn; whether officers told the suspect he was free to leave or under suspicion” and the types of questions asked. *Id.* at 305–06 (quoting *FNU LNU*, 653 F.3d at 153).

Even though the agents did not question the defendant for an unreasonably long time with the use of weapons or restraints in a non-public place, the court nonetheless found that the defendant was in custody. *Id.* at 306. First, the court found that the defendant was not free to leave once CBP agents instructed him to step aside for a “currency inspection.” *Id.* Second, there was nothing about the discovery of the cell phone that could or should have caused CBP agents concern because cell phones are not contraband. *Id.* Third, the inquiry into the ownership of the telephone and its passcode “completely changed the stage because the purpose of the original search was to find currency and currency cannot be found on a phone.” *Id.* Thus, because the function of the questioning was not to identify the passenger or to search for currency, the defendant was in custody when the CBP agent inquired about the phone number and pass code. *Id.*

In *Molina-Gomez*, three factors compelled the conclusion that an international traveler was “in custody” and should have been given *Miranda* warnings before questioning him about his involvement in drug activity. 781 F.3d at 22–23. First, at least two CBP agents took the defendant to “a small, windowless room, approximately, ten-foot-by-ten-foot.” *Id.* at 22. Second, CBP agents questioned the defendant “for between

one-and-a-half and two hours.” *Id.* Third, the questions asked strayed from the routine inquiries necessary to confirm his citizenship and eligibility to enter the country. *Id.* at 23. Instead, the agents’ questions probed the defendant’s involvement in drug smuggling activity. *Id.*

Here, as in *Molina-Gomez*, CBP agents questioned Mr. Ramadan in a separate room away from the public’s view. Mr. Ramadan, like any reasonable person, felt that he was not only forced to remain, but under investigation for criminal activity. His repeated requests to speak with a lawyer and to remain silent indicate that he felt the inherent pressures of an in-custody interrogation. The questions posed to Mr. Ramadan were more than routine; they asked about his religious and political beliefs; his knowledge of firearms and pipe bombs, and whether he agreed with known terrorist organizations. In addition, the interrogation went on for quite some time. An evidentiary hearing will help determine exactly how long federal agents grilled Mr. Ramadan, but we know his flight was scheduled to leave in the afternoon, and he was not released until the late evening. The agents therefore should have given Mr. Ramadan *Miranda* warnings.

B. Mr. Ramadan’s statements and their fruit must be suppressed because the agents did not cease questioning after Mr. Ramadan requested an attorney.

When it comes to a suspect’s requests for a lawyer, the Supreme Court has created a clear, hard and fast rule: “a suspect who has invoked the right to counsel cannot be questioned regarding any offense unless an attorney is actually present.” *Davis*

v. United States, 512 U.S. 452, 458 (1994). Any fruits of an interrogation conducted after a suspect has invoked the right to counsel must be suppressed. *Edwards v. Arizona*, 451 U.S. 477, 485 (1981). Law enforcement officers may continue questioning only after the suspect has made a knowing and voluntary waiver of the right to counsel. *Davis*, 512 U.S. at 461.

As explained above, Mr. Ramadan was in custody when the federal agents started asking him about his travel plans, the contents of his luggage, and for his passwords and passcodes. He requested a lawyer, and the agents responded with laughter and told him that he had no right to a lawyer. The questioning continued. Mr. Ramadan again requested a lawyer, and again the agents ignored that request. Because the officers failed to cease questioning and respect Mr. Ramadan's right to remain silent and to counsel, his statements and the fruits must be suppressed.

C. The tactics CPB agents used to extract Mr. Ramadan's statements were coercive, and so his statements were not voluntary.

Due process also prevents admission of the accused's involuntary statements and their fruits. At the evidentiary hearing, Mr. Ramadan will present evidence to show that his statements were not the exercise of free will; they were involuntary. "Any police interview of an individual suspected of a crime has coercive aspects to it." *J.D.B. v. North Carolina*, 564 U.S. 261, 268 (2011) (internal quotation marks omitted). Custodial interrogations heighten the risk that the statements made are not the product of free choice. *Id.* at 268–69. "[T]he physical and psychological isolation of custodial

interrogation can ‘undermine the individual’s will to resist and . . . compel him to speak where he would not otherwise do so freely.’” *Id.* at 269 (quoting *Miranda*, 384 U.S. at 467).

When deciding whether a statement is involuntary, courts must consider the totality of circumstances, which typically include the characteristics of the interrogee (age, education, intelligence), whether the suspect was informed of his rights, the length of detention, whether the questions were repeated or the interrogation prolonged, and whether physical punishment was used. *See Schneekloth v. Bustamonte*, 412 U.S. 218, 226 (1973). No one factor is dispositive; courts must evaluate all facts together to determine if “a defendant’s will was overborne.” *Id.* In the Sixth Circuit, courts should examine the record to see (1) if “the police activity was objectively coercive”; (2) if the coercion was sufficient to overbear the defendant’s will”; and (3) if the police misconduct was “the crucial motivating factor in the defendant’s decision to offer the statement.” *United States v. Mahan*, 190 F.3d 416, 422 (6th Cir. 1999).

An evidentiary hearing will reveal that the conduct of multiple federal agents overbore Mr. Ramadan’s will to remain silent. To start, Mr. Ramadan was escorted off the plane and into a separate room by multiple agents. He did not have a choice to remain on the plane or to refuse to follow the agents. Once in a windowless room, the agents never advised Mr. Ramadan of his rights to remain silent and to counsel. He expressed his desire for both, and the agents told him that he had no right to refuse to speak or to counsel, that he had no rights whatsoever, and that he must speak to the

officers and reveal his passwords, in particular. Mr. Ramadan was separated from his family, too. Federal agents moved him around from room to room, placed him in handcuffs, yelled at him, and physically assaulted him. Mr. Ramadan felt had no choice but to answer the agents' aggressive questions about weapons depicted in the photos and the storage locker. At various points during the interrogation, agents handcuffed Mr. Ramadan. The use of physical punishment in this case is particularly strong evidence that the agents' tactics were objectively coercive. Finally, the investigation into Mr. Ramadan began around 3:50 p.m.. Federal agents did not release him from custody until 4:00 a.m. the next day.

These facts are similar to those presented in *United States v. Brown*, 557 F.2d 541, 548–50 (6th Cir. 1977). The following facts compelled the conclusion that Brown's statements were involuntary: “the manifest hostility of the police toward [Brown]; his age; his physical condition and emotional state at the time of the confession; the proximity of the confession to a violent arrest; his expressed fears that he would be beaten by police; the inherent coerciveness of the back seat of a patrol car as a setting for a confession; and the fact that [Brown] was struck by one of the officers in the car at the time he made the incriminating statements.” *Id.* at 548.

All of the agents' coercive actions overbore Mr. Ramadan's will. His statements were involuntary. Because Mr. Ramadan's statements were involuntary and the warrant affiant used them to obtain a search warrant for the storage unit and his electronic

devices, all physical evidence seized pursuant to either search must also be suppressed. *See United States v. Lewis*, 110 F. App'x 569, 572 (6th Cir. 2004) (suggesting that, after *Patane*, the physical fruits of involuntary, un-*Mirandized* statements must be suppressed).

V. CONCLUSION

Mr. Ramadan requests an evidentiary hearing to establish that CBP agents interrogated Mr. Ramadan in violation of the Fifth Amendment and without proper prophylactic warnings. When he asked for an attorney, they did not cease questioning. The interrogation tactics and coercive environment overbore Mr. Ramadan's will. After consideration of the evidence, this Court should suppress Mr. Ramadan's statements and fruits seized as a result of that compelled disclosures.

Dated: October 25, 2017

Respectfully Submitted,

FEDERAL DEFENDER OFFICE

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s/Colleen P. Fitzharris
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EXHIBIT A

AUSA: Michael C. Martin

Telephone: (313) 226-9100

AO 93 (Rev. 11/13) Search and Seizure Warrant

Special Agent: Ryan Y. Schanberger

Telephone: (313) 965-6088

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
Devon Storage locker and various electronic devices more
fully described in Attachment A.

Case: 2:17-mc-51175 - 1
Case No. Judge: Borman, Paul D.

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Eastern District of Michigan
(identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A..

I hereby certify that the foregoing is a certified copy
of the original on file in this office.
Clerk, U.S. District Court
Eastern District of Michigan
By: s/Carolyn Ciesla
Deputy



I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):
SEE ATTACHMENT B.

YOU ARE COMMANDED to execute this warrant on or before September 6, 2017 (not to exceed 14 days)

[X] in the daytime 6:00 a.m. to 10:00 p.m. [] at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to the presiding United States Magistrate Judge on duty
(United States Magistrate Judge)

[X] Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

[X] for 30 days (not to exceed 30) [] until, the facts justifying, the later specific date of

Date and time issued: 8/23/17 1:27 pm

City and state: Detroit, MI

[Handwritten Signature]
Judge's signature
R. Steven Whalen, U. S. Magistrate Judge
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No.: 2:17-MC-51176-1	Date and time warrant executed: 8/23/2017 3:01 PM EST	Copy of warrant and inventory left with: INSIDE STORAGE UNIT B64 4750 STATE RD. ^{9NR} ^{AR-304} MI
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Inventory made in the presence of:
SA DAVID BANACH

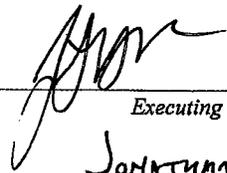
Inventory of the property taken and name of any person(s) seized:

H&W MODEL 1500 .308 RIFLE, 2 SCOPES, AR UPPER RECEIVER AND BARREL, ^{DN} ARMS SERIAL # 077832, 1 MAGAZINE (.308), 1 P&D SERIAL # G80239WC239 (32G), 1 P&D ^{DN} (UB013WT3238 (16G), 512 MB SD CARDS, 168 FLASH CARDS, AR-15 PARTS (BAR, CHARGING HANDLE, BI-PID), 2 BOLTS, 4 GUN PARTS, AR-15 PARTS, 4 EMPTY AR-15 MAGAZINES, 72 PC. M&B JUMBO SILVER SALUTE, 12X FINE TIGER SCARING ROCKET, 24X M&B CRACKER WOLF PACK (x2), 20X CHINATOWN SHAP CRACKERS, 2000 WOLF PACK SUPER LOUD, 278 WOLF PACK SUPER LOUD BOTTLE ROCKET, BB PISTOL SIG SAUER P226 SERIAL # 31123183, KIMBER PRO COVERT II SERIAL # KR230819 45 CAL., 4 GLOCK MAGAZINES 9mm, 1 DAMAGED GLOCK MAGAZINE, 1 RIFLE PISTOL GRIP, RUBEN MK II .22LR PISTOL SCRAPPED OF SERIAL NUMBER, JENNING J-22 .22LR, 16 WINCHESTER 6.56 BULLETS, 3 MAGAZINES LOADED FOR KIMBER PRO COVERT II, AR-15 PARTS, MISCELLANEOUS AMMUNITION, MISCELLANEOUS AMMUNITION, MISCELLANEOUS AMMUNITION, HOME MADE SILENCER, MAGAZINE LOADED W/BB'S, 3 MAGAZINES FOR RUBEN MK II .22LR AND BOX OF BULLETS, 29 RDS OF 45 CAL., 1 BOX OF 50 WINCHESTER 9mm BULLETS, 8MB COMPACT FLASH, 50 RDS OF 9mm AMMO, MISC AMMO, VICTORIA SECURE BOX WITH: CHARGING CORDS + ACCESSORIES, 4 MICRO SD CARDS, 9 PHOTOS.

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: 8/25/2017



 Executing officer's signature
JONATHAN A. BRANS SPECIAL AGENT

 Printed name and title

ATTACHMENT A

Property to Be Searched

1. Storage locker B64 held under the name of Jeanine Ramadan located at Devon Self Storage Facility, 4750 S State St, Ann Arbor, Michigan. The locker has a blue door and the sign "B 64" is affixed next to the door.

2. The following items recovered from the person or luggage of Yousef Mohammad Ramadan at DTW airport:
 - a. ASUS Computer, Serial Number G4PDCG00111N
 - b. Hitachi Hard Drive, Serial Number JP1572JE0Y8AUK
 - c. Toshiba Laptop Computer, Serial Number 6E038858P
 - d. Lenovo Laptop Computer, Serial Number PF01AKSF
 - e. Ten (10) SD cards for a digital camera
 - f. Seagate Backup Plus external hard drive, Serial Number NA7TK85N
 - g. Seagate external hard drive, Serial Number 2GE7954V
 - h. Toshiba external hard drive, Serial Number X19JTA46TR48
 - i. Toshiba external hard drive, Serial Number 64PCTX7GT18B
 - j. Seagate external hard drive, Serial Number NA47PV822
 - k. One (1) DVD disc

- l. One (1) AT&T Sim Card
- m. One (1) San Disk Memory Stick-Pro Duo
- n. Apple iPhone 6, Model A1522, Serial Number F2LNT629G5QL
- o. Apple iPhone 6, Model A1524, Serial Number DTRSM0XJG5R2
- p. Apple iPhone 7, Model A1661, Serial Number F2LSR4XGHFY2
- q. Apple iPod, Model A1421, Serial Number CCQP47Y0G22Q

ATTACHMENT B

Particular Things to be Seized

All information that constitutes evidence of a violation of 18 U.S.C. §§ 842(a)(3)(A), 842(j), 26 U.S.C. § 5861(d), and 18 U.S.C. § 1001, involving Yousef Mohammad Ramadan, including, but not limited to, the following:

- a. Weapons, firearms, explosives, bombs, destructive devices, or hazardous materials;
- b. Items related to firearms, such as ammunition, holsters, sights, or grips;
- b. Items reasonably considered to constitute components of a destructive device or bomb, including, but not limited to: wiring, timers, shrapnel, or containers;
- c. Location information, including GPS data and content relating to locations used and frequented by the devices listed in Attachment A;
- d. All information relating to Yousef Mohammad Ramadan's motive for possessing explosives or firearms, including propaganda materials or other information related to ISIS, terrorism, or acts of terrorism.
- e. Information relating to Devon Self Storage Facility or any other person or entity that may be in possession of firearms, explosives, bombs or destructive devices on behalf of Yousef Mohammad Ramadan;

AO 106 (Rev. 04/10) Application for a Search Warrant Special Agent: AUSA: Michael C. Martin Telephone: (313) 226-9100
Ryan Y. Schanberger Telephone: (313) 965-6088

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

In the Matter of the Search of)
(Briefly describe the property to be searched)
or identify the person by name and address))
Devon Storage locker and various electronic devices more)
fully described in Attachment A.)

Case: 2:17-mc-51175 - 1
Case No. Judge: Borman, Paul D.
Filed: 08-23-2017
IN RE: SEALED MATTER (CMC)

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 ATTACHMENT A.

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

SEE ATTACHMENT B.

I hereby certify that the foregoing is a certified copy of the original on file in this office.
Clerk, U.S. District Court
Eastern District of Michigan
By: s/Carolyn Ciesla
Deputy



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

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

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 842(a)(3)(A)	Unlicensed receipt of explosive materials. See attached AFFIDAVIT for more violations.

The application is based on these facts:

See attached AFFIDAVIT.

- Continued on the attached sheet.
- Delayed notice 30 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.

Applicant's signature
Ryan Y. Schanberger, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence and/or by reliable electronic means.

Date: 8/23/17

City and state: Detroit, MI

Judge's signature
R. Steven Whalen, U. S. Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN THE MATTER OF THE SEARCH OF:

- a. ASUS Computer, Serial Number
G4PDCG00111N
- b. Hitachi Hard Drive, Serial Number
JP1572JE0Y8AUK
- c. Toshiba Laptop Computer, Serial Number
6E038858P
- d. Lenovo Laptop Computer, Serial Number
PF01AKSF
- e. Ten (10) SD cards for a digital camera
- f. Seagate Backup Plus external hard drive,
Serial Number NA7TK85N
- g. Seagate external hard drive, Serial Number
2GE7954V
- h. Toshiba external hard drive, Serial Number
X19JTA46TR48
- i. Toshiba external hard drive, Serial Number
64PCTX7GT18B
- j. Seagate external hard drive, Serial Number
NA47PV822
- k. One (1) DVD disk
- l. One (1) AT&T Sim Card

Case No.

- m. One (1) San Disk Memory Stick-Pro Duo
- n. Apple iPhone 6, Model A1522, Serial Number F2LNT629G5QL
- o. Apple iPhone 6, Model A1524, Serial Number DTRSM0XJG5R2
- p. Apple iPhone 7, Model A1661, Serial Number F2LSR4XGHFY2
- q. Apple iPod, Model A1421, Serial Number CCQP47Y0G22Q
- r. Storage locker B64 held under the name of Jeanine Ramadan located at Devon Self Storage Facility, 4750 S State St, Ann Arbor, Michigan

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Ryan Y. Schanberger, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for the electronic devices and a storage locker further described in Attachment A that are associated with Yousef Mohammad Ramadan.

2. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and have been so employed since November, 2012. I am currently assigned

to a counterterrorism squad in the FBI's Detroit Division. As part of my duties, I investigate criminal violations relating to terrorism. Since joining the FBI, I have conducted several investigations of suspected homegrown violent extremists who are believed to have been radicalized online by the global violent jihadist movement. My training and experience has given me a working knowledge of how terrorism suspects operate and of the indications that they may be mobilizing in order to commit acts of violence.

3. My knowledge of the facts and circumstances contained within this affidavit is based upon my personal investigation, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of the following offenses has occurred: 18 U.S.C. § 842(a)(3)(A), which prohibits the unlicensed receipt of explosive materials; 18 U.S.C. § 842(j), which prohibits the unlawful storage of explosives; and 26 U.S.C. § 5861(d), which prohibits the unlawful manufacturing, receipt, or possession of a destructive device (which is defined to include any explosive or bomb), and 18 U.S.C. § 1001 (which prohibits making false

statements). There is also probable cause to search the information described in Attachment A for evidence of these crimes, as described in Attachment B.

PROBABLE CAUSE

5. On August 15, 2017, Yousef Mohammad Ramadan, a 28 year old naturalized United States citizen, traveled to Detroit Metropolitan Wayne County (DTW) Airport with his wife and four minor children. Ramadan went to the ticket counter for Royal Jordanian Airlines and purchased six tickets for himself and the members of his family for a flight to Amman, Jordan that departed later that same day.

6. Prior to the departure of the flight, Transportation Security Administration officers discovered the following items in Ramadan's checked luggage: a rifle scope and mounts, knives, OC pepper spray, tactical load-bearing vests, a gas mask, a vest with ballistic plates, two-way radios, a taser weapon system with extra cartridges, a pistol holster, ammunition pouches, and black masks.

7. A secondary inspection revealed Ramadan was in possession of an Apple iPhone 7, Model A1661, Serial Number F2LSR4XGHFY2, on his person. Ramadan's wife, Jeanine Ramadan, had an Apple iPod, Model A1421, Serial Number CCQP47Y0G22Q, on her person. In addition, the following electronic devices were packed in Ramadan's checked luggage:

- a. ASUS Computer, Serial Number G4PDCG00111N;
- b. Hitachi Hard Drive, Serial Number JP1572JE0Y8AUK;
- c. Toshiba Laptop Computer, Serial Number 6E038858P;
- d. Lenovo Laptop Computer, Serial Number PF01AKSF;
- e. Ten (10) SD cards for a digital camera;
- f. Seagate Backup Plus external hard drive, Serial Number NA7TK85N;
- g. Seagate external hard drive, Serial Number 2GE7954V;
- h. Toshiba external hard drive, Serial Number X19JTA46TR48;
- i. Toshiba external hard drive, Serial Number 64PCTX7GT18B;
- j. Seagate external hard drive, Serial Number NA47PV822;
- k. One (1) DVD disc;
- l. One (1) AT&T Sim Card;
- m. One (1) San Disk Memory Stick-Pro Duo;
- n. Apple iPhone 6, Model A1522, Serial Number F2LNT629G5QL;
- o. Apple iPhone 6, Model A1524, Serial Number DTRSM0XJG5R2.

8. Officers from the United States Customs and Border Protection interviewed Ramadan. Ramadan told the CBP officers that he was leaving the United States to live in Palestine. When CBP officers asked Ramadan about the various items described above that were found in his luggage, Ramadan could not give an

answer and became very nervous. Due to Ramadan's inability to answer questions about the items, CBP officers examined the external media drives. On the external media drives were: (1) videos of Ramadan shooting pistols and rifles, including a sniper rifle; (2) photographs and videos of pipe bombs; and (3) propaganda videos and photographs related to the designated foreign terrorist organization The Islamic State of Iraq and al-Sham ("ISIS"), including videos of ISIS fighters wearing black masks similar to the black masks found in Ramadan's luggage.

9. On or about October 15, 2004, the United States Secretary of State designated al-Qaida 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 State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan 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.

10. FBI agents interviewed Ramadan later on August 15, 2017. FBI agents presented Ramadan with a photograph obtained from his electronic media which depicted what appeared to be glass on a colored floor tile or counter-top tile. Ramadan stated that the items in the picture were broken glass pieces piled up on the tiled floor at his residence in Israel. He was then shown a picture of what appeared to be a homemade IED, also taken from review of his electronic media, that appeared to be made of a metal elbow joint, capped at both ends, with a fuse extending out of it. This type of device is often referred to as a pipe bomb. When asked about this, Ramadan stated that it was like a large firework that would make a loud bang when detonated, and that these items were sometimes used to throw at soldiers overseas. Interviewing agents then advised that the IED appeared to be photographed on the same flooring as the glass shard he admitted to be on the floor of his residence, to which Ramadan responded that all floor tiles overseas are similar in appearance and that he had in fact downloaded this image from the Internet. Ramadan was then asked specifically how long it took him to construct that pictured device and without hesitation he stated about one hour. Ramadan then immediately recanted, stating that he meant it would take about one hour if he had

had all the components needed to make the device. Ramadan was also asked what was used as shrapnel in the device and he responded that “they” put bullets inside.

11. Ramadan stated that he had made explosive devices before for “educational purposes” while overseas and had tested one by throwing it against a wall. He described the device as cylindrical in shape, approximately 2” long and similar to a CO2 cartridge, with a wick.

12. Ramadan acknowledged that the tactical items found in his checked luggage all belonged to him and claimed to have purchased them for personal protection, outdoor use, and for making his YouTube videos. Ramadan stated that he made several videos for his YouTube channels, which include a channel entitled “WB.88Guns.” I have examined the YouTube channel entitled “WB.88Guns.” This channel contains seven videos, which were posted between November 12, 2016, and February 23, 2017. The videos show an individual shooting or handling various types of firearms, including a Glock pistol, a Kimber Pro Covert pistol, a Winchester shotgun and a Mosin Nagant sniper rifle.

13. The video pertaining to the Kimber Pro Covert pistol was posted on December 1, 2016. Text containing a description of the video was posted at the same time as the video. The text states, in part, “SO HERE IS A NICE VIDEO SHOWING MY KIMBER PRO COVERT II (45 ACP).” Records from the State of Michigan

show that a Kimber 45 caliber Covert II pistol, serial number KR230819, is currently registered to Ramadan. The descriptive text from the Kimber Pro Covert YouTube video also states that the firearm "HAS A DESERT DIGITAL CAMO GRIP." Of the seven videos posted to "WB.88Guns," five of them take place outdoors in arid environments. The remaining two videos take place indoors.

14. During the interview with FBI agents, Ramadan stated that he currently owns three weapons, including two rifles and a Glock pistol that he placed in a self-storage location before departing for the airport. Ramadan did not disclose that he also owns the Kimber Pro Covert pistol. However, Ramadan immediately recanted and stated that he left the three firearms with a friend whose identity he would not provide.

15. On August 17, 2017, FBI made contact with a representative at the Devon Self Storage facility, located at 4750 S State St, Ann Arbor, Michigan. According to business records from Devon Self Storage, there is a storage locker there in the name of Jeanine Ramadan, Yousef Ramadan's wife. Records from Devon Self Storage facility show that: (1) Jeanine Ramadan rents a storage locker, unit B64, there on a month-to-month basis; (2) rent was paid for that storage locker on or about August 7, 2017, for the period ending on August 31, 2017; (3) "Mohammad Ramadan" is listed as an emergency contact on the "new customer

information sheet” completed by Jeanine Ramadan; (4) the storage locker was accessed on August 15, 2017, from 11:03 to 11:05 a.m.. FBI agents reviewed security camera video at the Devon Self Storage facility for this time period and observed that a male driving a Honda Odyssey minivan accessed the storage facility during this time period. A Honda Odyssey minivan is registered to Somaya Abufarha, at 4604 Nutmeg, Ypsilanti, Michigan. Somaya Abufarha is Ramadan’s sister. On August 15, 2017, Ramadan and his family were unable to make the flight to Amman, Jordan, on time. Ramadan’s wife, Jeanine Ramadan, told FBI agents on August 15, 2017, that she (Jeanine Ramadan) and Ramadan would reside with Ramadan’s sister at 4604 Nutmeg, Ypsilanti, Michigan. Since August 15, 2017, FBI agents conducted surveillance at 4604 Nutmeg, Ypsilanti, Michigan, and observed Ramadan at the residence on several occasions. In addition, Immigration and Customs Enforcement agents examined the Apple iPhone 7, Model A1661, Serial Number F2LSR4XGHFY2, that Ramadan had on his person at the airport on August 15, 2017, and found a copy of a letter from Devon Self Storage regarding the payment of rent for August, 2017.

16. During the same interview, Ramadan was questioned regarding the ISIS propaganda videos and photographs on his electronic media. Ramadan stated that he likes and watches all aspects of combat footage. He claimed that he does

support ISIS' goal of establishing the Caliphate and an Islamic State, but that he does not support their methods of violence to achieve that goal, instead preferring a peaceful approach to converting non-believers into the Muslim religion and/or forming an Islamic State.

17. When advised that viewing violent ISIS videos could lead to violence on his part, Ramadan responded by saying that if he ever wanted to commit an attack he certainly would not have to travel overseas to do it. Ramadan stated that he would do it in the United States as it would be much easier to accomplish than overseas. Ramadan stated that even if his weapons were confiscated, he could simply buy more weapons off the street to utilize, and that an attack in the United States would be far easier than attempting to do something overseas. Ramadan further stated that a domestic attack would still be viewed and praised as a huge victory by ISIS. Ramadan explained that he would never conduct any type of attack overseas because the Israelis retaliate against every family member for the acts of the perpetrator, even though they had no involvement.

18. Ramadan also told the FBI agents that he is a very private person and that he does not trust anyone, including his wife. Ramadan stated that he does not know if she will use something against him, as she has done in the past. Ramadan

further stated that he is a loner and that he keeps to himself because he does not trust anyone.

19. On August 17, 2017, the Bureau of Alcohol, Tobacco, Firearms and Explosives reported to the FBI that there exists no license on record for Ramadan to possess explosive material.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

20. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. The Device has the capability to access the internet. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

21. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the Device was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the Device because:

22. Data on the storage medium can provide evidence of a file that was

once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).

- a. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- b. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- c. The process of identifying the exact electronically stored information on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore,

contextual information necessary to understand other evidence also falls within the scope of the warrant.

23. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

24. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the device consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

25. *Manner of execution.* Because this warrant seeks only permission to examine a device already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

CONCLUSION AS TO PROBABLE CAUSE

26. Given the evidence set forth above, your affiant submits that there is probable cause to believe that a violation of the following offenses has occurred: 18

U.S.C. § 842(a)(3)(A), which prohibits the unlicensed receipt of explosive materials; 18 U.S.C. § 842(j), which prohibits the unlawful storage of explosives; and 26 U.S.C. § 5861(d), which prohibits the unlawful manufacturing, receipt, or possession of a destructive device (which is defined to include any explosive or bomb), and 18 U.S.C. § 1001 (which prohibits making false statements). There is also probable cause to believe that evidence of these crimes, as further described in Attachment B, will be found in the electronic devices and storage locker further described in Attachment A.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

27. I anticipate executing this warrant on the devices described in Attachment A, which are currently in the possession of the Department of Homeland Security. Upon receipt of the information described in Attachment A, government-authorized persons will review that information to locate the items described in Attachment B.

REQUEST FOR SEALING

28. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and search warrant. I believe that sealing this document is necessary because the warrant is relevant to an ongoing investigation into a terrorist

organization. Based upon my training and experience, I have learned that, terrorists and criminals actively search for criminal affidavits and search warrants via the internet, and disseminate them to other online criminals as they deem appropriate, i.e., post them publicly online through the carding forums. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

Respectfully submitted,



RYAN Y. SCHANBERGER
Special Agent
Federal Bureau of Investigation

Sword to before me and signed in my
Presence and/or by reliable electronic means..



8/23/17

HON. R. STEVEN WHALEN
EXECUTIVE UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

1. Storage locker B64 held under the name of Jeanine Ramadan located at Devon Self Storage Facility, 4750 S State St, Ann Arbor, Michigan. The locker has a blue door and the sign "B 64" is affixed next to the door.

2. The following items recovered from the person or luggage of Yousef Mohammad Ramadan at DTW airport:

- a. ASUS Computer, Serial Number G4PDCG00111N
- b. Hitachi Hard Drive, Serial Number JP1572JE0Y8AUK
- c. Toshiba Laptop Computer, Serial Number 6E038858P
- d. Lenovo Laptop Computer, Serial Number PF01AKSF
- e. Ten (10) SD cards for a digital camera
- f. Seagate Backup Plus external hard drive, Serial Number NA7TK85N
- g. Seagate external hard drive, Serial Number 2GE7954V
- h. Toshiba external hard drive, Serial Number X19JTA46TR48
- i. Toshiba external hard drive, Serial Number 64PCTX7GT18B
- j. Seagate external hard drive, Serial Number NA47PV822
- k. One (1) DVD disc

- l. One (1) AT&T Sim Card
- m. One (1) San Disk Memory Stick-Pro Duo
- n. Apple iPhone 6, Model A1522, Serial Number F2LNT629G5QL
- o. Apple iPhone 6, Model A1524, Serial Number DTRSM0XJG5R2
- p. Apple iPhone 7, Model A1661, Serial Number F2LSR4XGHFY2
- q. Apple iPod, Model A1421, Serial Number CCQP47Y0G22Q

ATTACHMENT B

Particular Things to be Seized

All information that constitutes evidence of a violation of 18 U.S.C. §§ 842(a)(3)(A), 842(j), 26 U.S.C. § 5861(d), and 18 U.S.C. § 1001, involving Yousef Mohammad Ramadan, including, but not limited to, the following:

- a. Weapons, firearms, explosives, bombs, destructive devices, or hazardous materials;
- b. Items related to firearms, such as ammunition, holsters, sights, or grips;
- b. Items reasonably considered to constitute components of a destructive device or bomb, including, but not limited to: wiring, timers, shrapnel, or containers;
- c. Location information, including GPS data and content relating to locations used and frequented by the devices listed in Attachment A;
- d. All information relating to Yousef Mohammad Ramadan's motive for possessing explosives or firearms, including propaganda materials or other information related to ISIS, terrorism, or acts of terrorism.
- e. Information relating to Devon Self Storage Facility or any other person or entity that may be in possession of firearms, explosives, bombs or destructive devices on behalf of Yousef Mohammad Ramadan;

f. Information relating to who used, accessed, possessed or communicated with the items listed in Attachment A.

The term “information,” includes information in all forms, including paper, photographic, video, or any other type of electronic coding or data.

AUSA: Michael C. Martin

Telephone: (313) 226-9100

AO 93 (Rev. 11/13) Search and Seizure Warrant

Special Agent:

Ryan Y. Schanberger

Telephone: (313) 965-6088

UNITED STATES DISTRICT COURT

for the Eastern District of Michigan

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

Devon Storage locker and various electronic devices more)
fully described in Attachment A.)

Case: 2:17-mc-51175 - 1
Case No. Judge: Borman, Paul D.

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer.

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Eastern District of Michigan (identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A..

I hereby certify that the foregoing is a certified copy of the original on file in this office. Clerk, U.S. District Court Eastern District of Michigan By: s/Carolyn Ciesla Deputy



I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

SEE ATTACHMENT B.

YOU ARE COMMANDED to execute this warrant on or before September 6, 2017 (not to exceed 14 days)

[checked] in the daytime 6:00 a.m. to 10:00 p.m. [] at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the presiding United States Magistrate Judge on duty (United States Magistrate Judge)

[checked] Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

[checked] for 30 days (not to exceed 30) [] until, the facts justifying, the later specific date of

Date and time issued: 8/23/17 1:27 pm

[Handwritten signature]

Judge's signature

City and state: Detroit, MI

R. Steven Whalen, U. S. Magistrate Judge

Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

ATTACHMENT A

Property to Be Searched

1. Storage locker B64 held under the name of Jeanine Ramadan located at Devon Self Storage Facility, 4750 S State St, Ann Arbor, Michigan. The locker has a blue door and the sign "B 64" is affixed next to the door.

2. The following items recovered from the person or luggage of Yousef Mohammad Ramadan at DTW airport:
 - a. ASUS Computer, Serial Number G4PDCG00111N
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 - c. Toshiba Laptop Computer, Serial Number 6E038858P
 - d. Lenovo Laptop Computer, Serial Number PF01AKSF
 - e. Ten (10) SD cards for a digital camera
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 - i. Toshiba external hard drive, Serial Number 64PCTX7GT18B
 - j. Seagate external hard drive, Serial Number NA47PV822
 - k. One (1) DVD disc

- l. One (1) AT&T Sim Card
- m. One (1) San Disk Memory Stick-Pro Duo
- n. Apple iPhone 6, Model A1522, Serial Number F2LNT629G5QL
- o. Apple iPhone 6, Model A1524, Serial Number DTRSM0XJG5R2
- p. Apple iPhone 7, Model A1661, Serial Number F2LSR4XGHFY2
- q. Apple iPod, Model A1421, Serial Number CCQP47Y0G22Q

ATTACHMENT B

Particular Things to be Seized

All information that constitutes evidence of a violation of 18 U.S.C. §§ 842(a)(3)(A), 842(j), 26 U.S.C. § 5861(d), and 18 U.S.C. § 1001, involving Yousef Mohammad Ramadan, including, but not limited to, the following:

- a. Weapons, firearms, explosives, bombs, destructive devices, or hazardous materials;
- b. Items related to firearms, such as ammunition, holsters, sights, or grips;
- b. Items reasonably considered to constitute components of a destructive device or bomb, including, but not limited to: wiring, timers, shrapnel, or containers;
- c. Location information, including GPS data and content relating to locations used and frequented by the devices listed in Attachment A;
- d. All information relating to Yousef Mohammad Ramadan's motive for possessing explosives or firearms, including propaganda materials or other information related to ISIS, terrorism, or acts of terrorism.
- e. Information relating to Devon Self Storage Facility or any other person or entity that may be in possession of firearms, explosives, bombs or destructive devices on behalf of Yousef Mohammad Ramadan;

f. Information relating to who used, accessed, possessed or communicated with the items listed in Attachment A.

The term "information," includes information in all forms, including paper, photographic, video, or any other type of electronic coding or data.