

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:19-mj-3916-Becerra

IN RE:
SEALED COMPLAINT

Filed Under Seal

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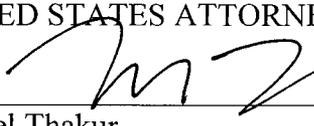
COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003? ___ Yes ___ X No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007? ___ Yes ___ X No

Respectfully submitted,

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY

By: _____


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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America)

v.)

Case No. 1:19-mj-3916-Becerra

Salman Rashid,)

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 May 2019 through present in the county of Miami-Dade in the Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 373	Solicitation to commit a crime of violence

This criminal complaint is based on these facts:

-SEE ATTACHED AFFIDAVIT-

Continued on the attached sheet.

Complainant's signature

Special Agent Kimberly J. McGreevy, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 11.21.19

Judge's signature

City and state: Miami, Florida

Hon. Jacqueline Becerra, U.S. Magistrate Judge

Printed name and title

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

I, Kimberly J. McGreevy, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

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

2. Based on my training and experience, and the facts contained below, I submit there is probable cause to believe that RASHID knowingly solicited another person to engage in conduct constituting a felony that has as an element the use or attempted use of physical force against property or against the person of another in violation of the laws of the United States, that is, the use, attempted use, or threatened use of weapons of mass destruction, in violation of Title 18, United States Code, Section 2332a(a)(2), all in violation of Title 18, United States Code, Section 373.

3. I am a Special Agent with the Federal Bureau of Investigation (hereinafter "FBI"), assigned to the FBI's Miami Field Office. I have been employed by the FBI since July 2011 and have served in the Miami Field Office for one year. Prior to Miami, I served at the FBI's Washington Field Office in Washington D.C., for approximately seven years. Throughout my service as an FBI Agent, in Miami and Washington, D.C., I have been assigned to the Joint Terrorism Task Force. As an FBI Agent, I have been the case agent for, or participated in, numerous counterterrorism investigations, including investigations of homegrown violent extremists. During the course of these investigations, I have examined materials posted on the Internet by terrorist organizations; reviewed emails, blogs, posts, and other Internet-based communications authored and maintained by members and supporters of terrorist organizations, including communications which threatened injury to another person; and 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

6. The FBI initiated an investigation of RASHID in or around April 2018 after reviewing his public Facebook posts, which advocated for the violent overthrow of democracy and the establishment of Islamic law. In or around May 2019, and without provocation, RASHID solicited a Confidential Human Source (hereinafter "CHS1") to contact members of ISIS¹ and

¹ On October 15, 2004, the U.S. Secretary of State designated al Qaeda in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act (the "INA") and as a Specially Designated Global Terrorist under section 1(b) of Executive Order

instruct those ISIS members to conduct a terrorist attack on RASHID's behalf.² Throughout the summer and fall of 2019, RASHID continued to instruct CHS1 regarding RASHID's requested attack, indicating an attack on a religious building or nightclub would be suitable. Based on RASHID's request, an additional Confidential Human Source was introduced (hereinafter "CHS3³"). CHS3 held him/herself out to be a member of ISIS willing to conduct an attack.⁴ Thereafter, RASHID continued to insist the attack take place soon and that CHS3 (the notional ISIS attacker) should make sure to escape alive. RASHID wanted CHS3 to plan the attack so that there would be no risk to RASHID or CHS1. Ultimately, RASHID chose two targets – the deans of two local colleges from which RASHID had been suspended or expelled – and asked that the explosive devices to be placed by CHS3 be as big as possible.

13224. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA 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 also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (i.e., "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-Furqan Establishment for Media Production. In an audio recording publicly released on June 29, 2014, ISIS announced a formal change of its name to the Islamic State. 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.

² Although RASHID, unbeknownst to him, solicited a confidential human source to commit an act of violence, Title 18, United States Code, Section 373(c) specifically states that "[i]t is not a defense to a prosecution under this section that the person solicited could not be convicted of the crime because he is not subject to prosecution."

³ Another Confidential Human Source (CHS2) was utilized during the investigation and is referenced herein.

⁴ Neither CHS3 nor any other confidential human source involved in this case was actually a member of ISIS.

PROBABLE CAUSE

Background

7. RASHID was born in Bangladesh, and he is a naturalized United States citizen. RASHID resides in the Southern District of Florida.

8. The FBI initially became aware of RASHID in or around April 2018 after reviewing RASHID's public Facebook posts, which exhibited a growing hatred for America, democracy, non-Muslims and secular Muslims, while expressing his belief in the violent overthrow of the democratic system and the destruction of those who will not accept his version of Islam. An FBI review of RASHID's Facebook Account, located at www.facebook.com/DefenderOfTheDeen (hereinafter "the Facebook Account"),⁵ contained identifying information that established RASHID as the account user: the profile name was listed as "Rasheed Salman," the profile photographs matched the known appearance of RASHID, and the profile information indicating the user studied at Miami Beach High School matched known information about RASHID.

9. At the initiation of the investigation, and in an effort to determine the threat RASHID posed to the community given his Facebook posts, an FBI online Confidential Human Source contacted RASHID through Facebook Messenger to establish an online friendship at the direction of the FBI. During subsequent conversations, the online Confidential Human Source, in an effort to build rapport and at the FBI's direction, expressed his/her support for RASHID's postings, affirmed RASHID's worldview regarding the oppression of Muslims, and supported the

⁵ The deen is an Arabic word and Quranic term meaning the Islamic religion, especially the path along which righteous Muslims travel in order to comply with divine law.

establishment of Shariah⁶ law. In or around April 2019, the FBI transitioned the person behind the online persona to a different Confidential Human Source (CHS1) in order to facilitate the in-person meetings referenced herein.

RASHID's Threat to a Female Peer

10. As the investigation continued, the FBI also became aware of threats made by RASHID against a female student (Complainant 1) at Miami Dade College (hereinafter "MDC"). On or about November 19, 2018, Complainant 1 filed a report with campus authorities regarding threatening text messages she received from RASHID, a fellow classmate at MDC. RASHID used an online messaging platform named Remind (hereinafter "Remind") to send the victim communications. An FBI review of the text messages indicated RASHID developed unrequited romantic feelings for Complainant 1. In or around late November 2018, using Remind, RASHID sent Complainant 1 a series of text messages which prompted her to report RASHID to MDC authorities. In one of those messages, RASHID stated, "The first day since I have been observing you, I already knew something was different about you. I want you to know that, you were my only other half in this life...It burns my eyes and heart, rips me apart as a human to imagine seeing you in the arms of another man, being touched. But I am powerless to stop what had happened without my knowledge. Since the creator of this universe have decided our destiny and chosen separate paths for us, I've understood myself and what I must do...In the hereafter, we will meet once again. But things will be a little different :). You will not have excuses, will not be given a choice and will have to come close to me..." The next day, she reported the threatening message to the Miami-Dade police, and the day after that, to Miami-Dade College authorities.

⁶ Shariah law is Islamic religious law.

11. In late January 2019, RASHID attempted to contact Complainant 1 through Remind on three consecutive nights. On the first night, RASHID sent a text message with one period (i.e., “."); on the second night, a message with two periods (i.e., “..”); and on the third night, three periods (i.e., “...”). At that time, Complainant 1 deleted Remind from her cellular phone; Complainant 1 reported she has not been contacted by RASHID since that time. However, a review of records received from Remind indicated RASHID sent messages through the Remind application to Complainant 1 as recently as April 4, 2019, which was several months after Complainant 1 had deleted the Remind application. The messages were similar to those described by Complainant 1, consisting of a cascading series of periods.

12. On or about March 21, 2019, during an interview with FBI Agents, Complainant 1 stated that she felt threatened by RASHID's messages. Further, Complainant 1 revealed she believed RASHID attempted to follow her to her vehicle after class. On one occasion, Complainant 1 noticed RASHID behind her while walking to her vehicle, so she stepped into the women's restroom in order to wait for RASHID to leave. When Complainant 1 emerged from the restroom, RASHID was still present. Complainant 1 pretended to be using her cellular phone until, ultimately, RASHID departed the area. Based on my training and experience, I know that individuals who transmit threats over the internet may ultimately attempt to locate the target of those threats in order to further threaten or actually commit an act of violence.

13. An FBI review of the internet search history associated with an email address known to be utilized by RASHID, which was obtained through a search warrant, revealed that RASHID was stalking Complainant 1 and, among other searches, conducted an internet search for “how to stalk someones house.”

14. In or around December 2018, RASHID was suspended from MDC for the threatening messages sent to Complainant 1. On or about May 8, 2019, RASHID was expelled from Broward College (BC) for failing to disclose the disciplinary matter at MDC regarding the threatening messages.

15. On or about May 10, 2019, while meeting with CHS1, RASHID indicated he was driving past Complainant 1's residence.⁷ On or about May 11, 2019, during subsequent meetings with CHS1, RASHID indicated he knew where Complainant 1 lived and worked, and that she lived a few blocks from his (RASHID's) residence.⁸ Further, RASHID indicated he reviewed Complainant 1's Facebook page. When CHS1 asked if RASHID forgave Complainant 1, RASHID said he had no reason to forgive her based on the injustice she perpetrated against him.

16. On or about September 10, 2019, Complainant 1 contacted the FBI after she reviewed RASHID's Facebook Account and saw a video RASHID posted which depicted a man grieving over his murdered girlfriend with RASHID's accompanying post that stated, in part: "I...will soon leave this world," and, "the agony of living is unbearable. I am defeated by an enemy I loved..." Complainant 1 believed RASHID was referring to her in his Facebook posts and was concerned for her safety. Referring to RASHID's posted end-of-life statements, Complainant 1 worried that if RASHID were seeking to end his own life, RASHID might want to take Complainant 1 with him into the afterlife.

RASHID's Use of Facebook to Send Threats and Solicit Violence

⁷ Reviews of consensual recordings and information collected by a court-authorized tracking device revealed RASHID was likely driving in the vicinity of Complainant 1's known residence at or around the time RASHID referred to Complainant's residence.

⁸ FBI investigation has revealed Complainant1 resides within one mile of RASHID's residence.

17. RASHID's Facebook posts contained other references toward violence to women, including a post on or about February 20, 2019, in which RASHID wrote, "Feminists are a Cancer on Earth. If I had Authority, I Would Strip their skin from Flesh and Hang their Bodies In the Sun to Rot." When another user admonished RASHID to "take it easy," RASHID replied, "You have no idea what I have suffered because of them. If you were in my place with the same experience, You wouldn't even wait a second to rip them apart."

18. RASHID additionally posted numerous threatening messages to his account related to his grievances against the United States and toward the treatment of Muslims. For example:

- a. On or about March 17, 2019, another Facebook user wrote a post hoping that Allah would avenge the March 15, 2019 mass shooting targeting two mosques in New Zealand. In response, RASHID wrote, "My Brother. Yes. Not only Allah. I will avenge it myself."
- b. On or about April 1, 2019, RASHID posted the following statement: "I am just waiting to see how far they can go. Let them run. When I have Allah's Signal, I will burn everything as I see suitable."
- c. On or about April 10, 2019, during the month of Ramadan, RASHID encouraged a male juvenile, age 14, on Facebook to use the "blessed month" to "train" for "Jihad Fi Sabilillah," referring in context to a violent struggle for Islam, and "Fight our enemies later during the upcoming year." The juvenile "liked" RASHID's comment.
- d. On or about May 1, 2019, RASHID threatened another Facebook user to "break their bones" if he/she didn't follow his (RASHID's) religious authority, prompting

this person to contact the FBI because they were in fear that RASHID could hurt them or, based on his violent Facebook messages, others on a large scale.

- e. Also on or about May 1, 2019, RASHID posted that he “will have to take necessary tasks that are quiet horrific but for the greater good of the fate of Muslims.”
- f. On or about May 22, 2019, RASHID commented on a Facebook post which discussed the closing of a California mosque based on alleged permit violations. RASHID wrote, “We need some violent offensive frontline defenses. Then they will consider everything without question and won’t dare make these decisions.”
- g. On or about October 13, 2019, RASHID wrote a lengthy post to accompany a video about Islam and stated that Hitler may have been a “[j]ust ruler who wanted to protect his kingdom to wipe out a cancer that was rapidly growing with in it” who “understood the risk of keeping these Jews alive and wanted to just wipe them out to clear garbage.”

RASHID’s Belief in his Role as a Leader in the Muslim Community

19. From on or about March 16, 2019, through March 18, 2019, RASHID engaged in a Facebook Messenger conversation with another FBI Confidential Human Source (hereinafter CHS2). During the conversation, RASHID declared himself the next rightful Caliph⁹ and indicated he intends to reestablish the Caliphate¹⁰.

⁹ A Caliph is a person considered to be the leader of the entire Muslim world, and is the successor to the Islamic Prophet Mohammad.

¹⁰ A Caliphate is an Islamic state ruled by a Caliph (i.e. the leader of the entire Muslim world).

20. After RASHID wrote that he could not marry “while enemies are plotting everywhere we have things to complete,” RASHID suggested CHS2 “[s]tart by moving to Miami Then We will build up.” RASHID also indicated he (RASHID) and his associates use other brothers “as spies to keep our eyes open.” Ultimately, RASHID instructed CHS2 to follow RASHID’s Facebook page, then wrote, “other than that I will keep you informed on whats app. the most critical things you know what I mean.”

21. WhatsApp provides an internet-based communication platform with end-to-end encryption to ensure that only the parties involved in those communications can see the content. Given the statements documented herein and RASHID’s prolific and public postings on Facebook, I believe RASHID utilized WhatsApp to avoid detection by law enforcement when he communicated information containing evidence of a crime.

RASHID Sought to Solicit ISIS to Conduct an Attack

22. On or about May 11, 2019, during an in-person, recorded meeting with CHS1, RASHID indicated he wanted to leave this world because there is nothing for him. However, he still had something to do and planned to finish his task before he left this world.

23. On multiple occasions during the in person meetings, RASHID indicated he wanted to die soon. CHS1 encouraged RASHID to attend the counseling that was mandated for RASHID by MDC and to consider finding another woman to marry. Near the end of the meeting, RASHID indicated he (RASHID) believed Allah did not want RASHID to have a happy life. When CHS1 tried to encourage RASHID, RASHID admonished CHS1 to not put doubts in RASHID’s heart.

24. On or about May 24-25, 2019, via WhatsApp messenger, RASHID asked CHS1 to find ISIS brothers who would avenge perceived attacks on Muslims in RASHID's community¹¹. Specifically, RASHID generally described two incidents at local mosques, to include a police-involved shooting¹² and a disrupted threat to a mosque¹³. RASHID also described a third incident, indicating there was an attack at a Miami area mosque (distinct from known incidents) which resulted in numerous injuries.¹⁴ After expressing his anger and frustration, RASHID wrote, "If you know any brothers from ISIS that do have some sympathy for us let them know what is going on. They should avenge this with caution...you know what i mean...I will also message the ones who are with me on FB." Based on my knowledge of the investigation, I believe "FB" is a reference to Facebook.

25. During the WhatsApp messenger conversation with CHS1 on or about May 24-25, 2019, RASHID also wrote, "Any brothers you can bring to use would be helpful. Tell them to stay alive and use tricks. No point of making sacrificial strikes which will only weaken us further...just talking about it will do nothing. We need to take action..." When CHS1 asked "What can we do," RASHID responded, "As i told you contact brothers who are capable of avenging us...Talk to those who you trust...Find sources...Look around you will find it. Search blogs,

¹¹ Even though CHS1 had never expressed an affiliation with a terrorist group, RASHID appeared to feel safe suggesting CHS1 contact ISIS.

¹² According to open source reporting, on or about May 24, 2019, an individual wanted for attempted murder was shot and killed by law enforcement outside a local Miami mosque.

¹³ According to open source reporting, on or about May 20, 2019, an individual was arrested in Miami Gardens, Florida, after posting threats on Facebook. The individual threatened to kill Muslims one by one.

¹⁴ The FBI is unaware of any such incident.

website everything.” RASHID further instructed CHS1 to screen the potential terrorist properly before trusting him.

26. On or about June 7, 2019, during a WhatsApp messenger chat, RASHID reintroduced the topic of an attack, writing, “Keep working on the task i gave you Do not fall back akhi we dont have much time . . . Anyone that can contact the good brothers in (u know who) tell them to avenge what has happened to muslims in Miami. any other type of religious building attack is fine. If you know what i mean. I am writing in short indirect lines since i don’t trust any place...put your effort and Do not fear. Trust me this task more important than a lot of things right now.”

27. When CHS1 asked RASHID whether he wanted “Quantity or quality” regarding the attack, RASHID replied, “Both together.” After CHS1 intimated one incident would not make a difference, and that people would forget, RASHID replied, “well the thing is it will scare them and put fear.”

28. On or about June 20, 2019, during a WhatsApp messenger chat, when CHS1 indicated s/he was still working on finding individuals to conduct an attack, RASHID instructed CHS1 to “stay consistent...Just find some of them and push them that’s all you have to do. Take no risk for yourself.”

29. On or about June 30, 2019, during a WhatsApp messenger chat, CHS1 asked RASHID how many individuals RASHID believed were necessary for the attack. RASHID replied, “as many as possible...10-15 at least...give them a push, tell them it is time...to make the incident. Take no risk for yourself.” When CHS1 asked if less than 10 individuals was acceptable, assuming the individuals were “faithful” and “Lions,” RASHID replied, “That is fine. as much as you can. And tell them no suicides just do it and flee. Plan an escape route...”

30. On or about July 2, 2019, during a WhatsApp messenger chat, RASHID directed CHS1 to refer any members of ISIS who had questions about RASHID to RASHID's Facebook page.¹⁵ RASHID also wrote, "Tell them that Brother Salman does not lie and is someone who is aware of the events surrounding him. He knows when is the time for what."

31. On or about July 19, 2019, during a WhatsApp messenger chat, CHS1 informed RASHID that CHS1 identified an individual who could potentially assist with the attack, and requested RASHID's assistance in vetting the individual. In fact, the individual is a Confidential Human Source (hereinafter CHS3). RASHID provided CHS1 with vetting questions, largely centered on CHS3's understanding of the Quran and Islamic history. RASHID also directed CHS1 to inquire as to CHS3's willingness to die for Islam; RASHID requested a picture of CHS3 as well.

32. On or about July 30, 2019, during a WhatsApp messenger chat, RASHID asked CHS1 for an update on the progress of the attack plotting and indicated he was praying for CHS1 and "the other brothers who are serving the Deen from [RASHID's] heart." CHS1 indicated s/he asked the vetting questions of CHS3 according to RASHID's direction, and that CHS3 answered the questions to CHS1's liking. When CHS1 asked RASHID how RASHID wanted to utilize CHS3, RASHID wrote, "Tell them to start the operation its time. Nothing just get it done simple. Tell them to fully tawakkul llallah¹⁶ and avenge us." When CHS1 asked if RASHID had a plan for CHS3, RASHID indicated CHS3 and his/her associates should be smart enough to plan the attack and make sure there is an escape route.

¹⁵ On or about July 4, 2019, RASHID wrote a lengthy Facebook post about his perceived Islamic authority and the need for discretion to avoid the enemy, and also encouraged individuals to message him privately.

¹⁶ Tawakkul is an Arabic term which means to place one's trust in Allah.

33. On or about August 2, 2019, during a WhatsApp messenger chat, CHS1 indicated to RASHID that CHS3 was “eager to strike fear” and that CHS3 “did not want to disappoint.” CHS1 asked RASHID, “Where in Miami would make the most impact[?]” RASHID replied, “Tell him to think it out with the other brother[s]. If he is here, he can look around and decide. Just make sure it is someone who we hate not those who didn’t do anything against us. In other words arrogant men and women who refuse to recognize our authority and hate Islam. People who only work to live but are non Muslims should not be target. I am sure you get what i mean. Talking about white men like that new Zealand shooter and naked prostitutes that walk around almost naked wearing sunglasses with arrogance and pride breaking our laws of Islamic Shari’ah. Tell him to use the brothers to teach them a lesson. Children should not be target.” CHS1 asked, “Do you want us to strike a church...Or should we go where the naked Kafirs are , more like the Shaheed Omar Mateen , and what he did to that night club in Orlando[.]” RASHID replied, “start with the first then the other if possible. Make sure there is escape route. Don’t [want] any losses.”

34. On or about September 13, 2019, during a WhatsApp messenger chat, RASHID indicated he had been banned from Facebook for one month “for no reason.” CHS1 indicated he/she knew a seven-year-old child who was bullied for being Muslim. RASHID replied, “This is a time when we need brothers in groups like Al Qaeda¹⁷ and Isis...we can’t be sitting and doing

¹⁷ On or about October 8, 1999, the United States Secretary of State designated al Qa’ida (“AQ”), also known as al Qaeda, 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. The Secretary of State also added the following aliases to the FTO listing: “the Base,” the Islamic Army, the World Islamic Front for Jihad Against Jews and Crusaders, the Islamic Army for the Liberation of the Holy Places, the Usama Bin Laden Network, the Usama Bin Laden Organization, Islamic Salvation Foundation, and The Group for the Preservation of the Holy Sites. To date, AQ remains a designated FTO.

nothing ofcourse not. Kafirs¹⁸ have to be left in fear if we want to live in peace. That's just the way it works in today's world. At least until we get our power back. I am expecting their assistance sometime soon hopefully." CHS1 replied, "I am ready Akhi," to which RASHID replied, "You don't have to be ready...Just make sure to get in touch with them and let them know it's time. They will do the rest." Ultimately, CHS1 replied, "The ISIS brother I found is willing and planning, but his connections in Syria are Shaeeds¹⁹, the Kufar and their drones. He is working hard, but it's not a group like we hoped . He is being extra carefully because he is alon[e]." RASHID replied, "Then in that case he must make sure he comes out alive. This is a must."

35. On or about October 3, 2019, during a WhatsApp messenger chat, CHS1 and RASHID made tentative arrangements to meet in person in South Florida in or around early November 2019.

36. On or about November 8, 2019, during an in-person meeting in South Florida recorded by CHS1, RASHID initiated a conversation about the attack. The following conversation ensued:

- a. RASHID encouraged CHS1 to keep making the plan because "we need to take our revenge now." CHS1 indicated that CHS3 was ready to conduct the attack. RASHID noted that CHS3 should not tell anyone about the attack, and that the fact that RASHID and CHS1 were aware of the attack was dangerous for CHS3.
- b. CHS1 stated that CHS3 can build a bomb for the attack and will place the bomb at a location of their (RASHID and CHS1's) choosing. RASHID was hesitant to

¹⁸ Kafir and kuffar are Arabic terms used to describe non-believers.

¹⁹ Shaheed is an Arabic term referring to a martyr, as in one who died committing violent jihad.

provide a location, saying he (RASHID) preferred that CHS3 pick the target. CHS1 reminded RASHID that CHS3 was not from Miami, indicating CHS3 needed assistance. RASHID indicated the target should be a place where there was lots of drinking, clubbing, and extreme sinning.

- c. RASHID did not want children to be killed in the bombing because RASHID did not want to “get all the sins.” CHS1 agreed that children should not be harmed, which was further reason to choose the target.
- d. RASHID indicated CHS3 should target the college that “gave [him] trouble,” saying the attack would “literally shake their hearts,” later affirming he was referring to MDC. RASHID indicated MDC had caused trouble for him because of his faith and belief in Allah.
- e. RASHID then stated he (RASHID) wanted to target a dean at a Broward College (BC) campus (hereinafter “Broward Dean”) before the attack at MDC. RASHID claimed the Broward Dean hated RASHID. RASHID provided the dean’s first and last name. RASHID located the Broward Dean’s photograph on the internet, saying, “this person, this piece of [expletive deleted].” When CHS1 asked if s/he could take a picture of the picture, RASHID said, “Take it. Get him killed, and inshallah²⁰ inshallah everything will be the best.”
- f. As CHS1 prepared to send the photograph to CHS3, RASHID stopped CHS1 because RASHID was concerned about his (RASHID’s) phone being captured in CHS1’s photograph, noting it was “kind of risky.” RASHID instructed CHS1 to

²⁰ Inshaallah is an Arabic term meaning god-willing.

zoom in the photograph, presumably in order to crop out the face of RASHID's phone. CHS1 retook the photograph to RASHID's liking.

- g. RASHID located information on his phone related to a dean at MDC (hereinafter "Miami Dean"), saying, "So now [first and last name of Miami Dean], this piece of [expletive deleted]. Where is he? Right there...the room is [specific room and building number]..." CHS1 took a picture of the information, including a photograph of the Miami Dean and his office location information.
- h. RASHID continued, saying, "So, these are the two targets that are the prime. So they're the prime 2 targets. If these two can go down, on on these 2 college campuses, then inshallah inshallah, tell them that, you know...These two people, these two people, they hate Islam more than everybody else out there...if these two people die, I can assure you that whoever kills these two people, their Jannah²¹ is guaranteed by Allah...these two people, they need to die."
- i. RASHID claimed that he had been humiliated by an encounter when one of the deans at the college brought the police to a meeting with him, requested that RASHID take off his jacket, and asked if he had anything under his shirt.
- j. RASHID dictated a series of messages for CHS1 to send CHS3, which CHS1 contemporaneously typed and sent to CHS3, including the aforementioned photographs. RASHID directed CHS1 to explain to CHS3 that the attack would benefit the deen of Allah, and that RASHID would ensure CHS3 earned his/her place in Jannah. At one point during the dictation, RASHID instructed, "...if you

²¹ Jannah in Arabic means paradise in the afterlife.

can kill these two..” and then corrected himself, instructing CHS1 to instead type “if you can get it done,” noting that using a word such as kill would be “too straightforward.”

- k. RASHID asked that CHS1 tell RASHID about CHS3’s actions via WhatsApp, and noted that CHS1 should be “indirect” when conveying the information. RASHID admonished CHS1 to be very careful because CHS1 was linked to RASHID through Facebook and their phones, indicating RASHID would be identified if CHS1 were to “get in trouble.” RASHID insisted CHS1 take no unnecessary risks, remain patient, and “strike them down” when the time is right. Based on my training and experience, I understand those engaged in criminal activity use coded or veiled language in attempt to avoid detection by law enforcement, and believe these attempts indicate RASHID’s guilty knowledge of his actions.
- l. RASHID indicated that the Miami Dean and the Broward Dean were not just RASHID’s enemies, but also “enemies of Islam, enemies of Allah.”
- m. At the end of the conversation, RASHID said he (RASHID) was “glad” RASHID and CHS1 “figured it out.”

37. On or about November 9, 2019, during an in-person, consensually recorded meeting, CHS1 received text messages from CHS3. The following conversation ensued:

- a. RASHID asked CHS1 whether CHS3 had been sent the location of the attacks: “Did you send them the, the room numbers? The room numbers were right on the picture on the website. So they know. And remember that the first number is the building number.” CHS1 responded, “...are we serious about this?” RASHID replied, “Absolutely. Absolutely. These two need to get out. They’re not playing

around. I never play around to be honest. Playing around has never been my personal way.” CHS1 and RASHID agreed they would message CHS3 later.

- b. Later in the conversation, CHS1 again provided RASHID the opportunity to decline the attack, asking RASHID, “We are 100% sure?” RASHID replied, “When when they feel it, you know, ultimately, the others, including you know, the cops in that area, they will be very scared of the Muslims, to do anything against us. That is a good thing. We need to make them become fearful. Otherwise, they will always, you know, create issues. Because we barely have any protection here. They’re doing all kinds of things against us.”
- c. Later in the conversation, RASHID reintroduced the topic of the attack, stating, “I just hope they don’t blame it on me, that’s all.” RASHID then discussed providing some reward to CHS3 for carrying out the attack, stating that CHS3 “should receive something. A gift from us, for their actions...a small gift.”
- d. RASHID directed CHS3 to conduct the attack when s/he was able, but to not conduct the attack during the last week of November due to heavy security on campus then.
- e. RASHID provided a description of security on campus, stating, “Most of the times there is barely security maybe one cop car stays there, in front, not in front, not all the time, maybe just one.” RASHID further explained that the offices had one door that “[a]nybody could just walk through” and that “[i]t won’t be that hard.” CHS1 read aloud as s/he typed RASHID’s answers into messages for CHS3.

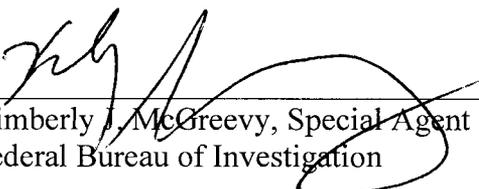
- f. RASHID told CHS1 that he would keep their plan a secret. RASHID further confided that he was keeping some secrets involving others from CHS1 because otherwise it would be “dangerous” for RASHID.
- g. Regarding the size of the explosions, RASHID instructed CHS1 to tell CHS3, “If he can make it big, do it as hard as he can.”

CONCLUSION

38. Based on the above, I submit there is probable cause to believe that RASHID, in the Southern District of Florida, and elsewhere, knowingly solicited another person to engage in conduct constituting a felony that has as an element the use of physical force against the person of another in violation of the laws of the United States, in violation of Title 18, United States Code, Section 373.

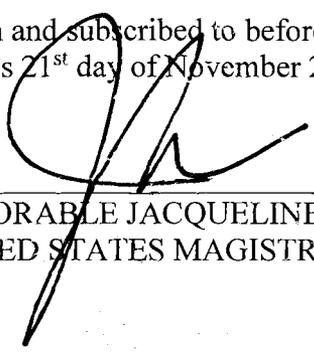
39. Accordingly, your affiant respectfully requests that the Court issue a criminal complaint and arrest warrant for RASHID.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Kimberly J. McGreevy, Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before
me this 21st day of November 2019.



HONORABLE JACQUELINE BECERRA
UNITED STATES MAGISTRATE JUDGE