

UNITED STATES DISTRICT COURT

for the
District of South Carolina

United States of America

v.

ZAKARYIA ABDIN

Case No.

2:17mj 81

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 _____ in the county of Charleston and Berkeley in the
_____ District of South Carolina, the defendant(s) violated:*Code Section*

18 U.S.C. 2339B

*Offense Description*Providing Material Support or Attempting to Provide Material Support to a
Foreign Terrorist Organization.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

Special Agent Clinton F. Pierce, FBI JTTF

Printed name and title

Sworn to before me and signed in my presence.

Date: March 31, 2017City and state: Charleston, South Carolina
Judge's signature

United States Magistrate Judge Bristow Marchant

Printed name and title

SEALED
Redacted

AFFIDAVIT IN SUPPORT OF AN
APPLICATION FOR A CRIMINAL
COMPLAINT AND ARREST
WARRANT
(Under Seal)

2:17mj 81

1. I, Clinton F. Pierce, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), having entered on duty on July 18, 2010, and as such, am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws and am within the category of officers authorized by the Attorney General to request and execute arrest and search warrants.

3. I have investigated national security cases involving individuals seeking to travel overseas to

commit violent jihad, (i.e. to fight and engage in terrorist activity) as well as individuals involved in using the internet and social media applications in support of terrorist activities and/or organizations. Additionally, I have completed FBI administered counterterrorism classroom and online training, at the FBI Academy and other FBI facilities. Currently, I am assigned to the South Carolina Joint Terrorism Task Force ("JTTF"). My duties at the JTTF include investigating criminal violations of the federal laws of the United States. During my six year career as an FBI Special Agent, I have participated in investigations of individuals who are motivated by extremist ideology and groups who commit or conspire to commit criminal acts, including acts of terrorism. I have conducted and participated in physical and electronic surveillance, executed search warrants, debriefed informants and

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cooperating witnesses and reviewed recorded conversations. Additionally, I have received training, both formal and informal, in counter terrorism cases through the FBI's training academy in Quantico, Virginia. As an FBI Special Agent with the JTTF I have investigated Counterterrorism and Criminal matters. This investigative experience has provided a comprehensive understanding of how extremists utilize social media, the internet, and criminal activity to support terrorism.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other FBI employees as well as from other law enforcement agencies. This affidavit is intended to show merely that there is sufficient probable cause to support the criminal complaint and does not purport to set forth all of the knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, in reliance on draft verbatim transcripts that have not yet been finalized but I believe are accurate in their representation of the substance or the conversations and statements. All dates are on or about the specified date.

5. Based on my training and experience as a Special Agent with the FBI, as well as the facts set forth in this affidavit, there is probable cause to believe that on or about January 3, 2017, through March 30, 2017, Zakaryia Abdel Abdin (Abdin) attempted to provide material support to a designated foreign terrorist organization, the Islamic State of Iraq and al-Sham ("ISIS") in violation of Title 18, United States Code, Section 2339B(a)(1). Specifically, Abdin attempted to provide material support or reUCEs, as the term is defined in 18 U.S.C. § 2339(a), namely personnel, (i.e. himself), to ISIS and has performed these acts in the District of South Carolina.

6. This Court is advised that there are statements within the Probable Cause section of this Affidavit that have been preliminarily translated from Arabic into English by a qualified FBI Linguist for the purpose of accurately representing the statements made by Abdin. Where there



are multiple instances of a particular term or phrase, Affiant will only include a translation for the initial occurrence.

PROBABLE CAUSE

Title 18, United States Code, Section 2339B(a)(1)

7. Title 18, United States Code, Section 2339B states: "Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, shall be fined under this title or imprisoned. . . . To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization (as defined in subsection (g)(6)), that the organization has engaged or engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), or that the organization has engaged or engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989)." Title 18 U.S.C. § 2339(A)(b)(1) provides a definition for material support, which includes "any property, tangible or intangible, or service, including... training, expert advice or assistance... weapons... (and) personnel (one or more individuals who may be or include oneself)."

Designation of ISIS as a Foreign Terrorist Organization

8. On or about October 15, 2004, the United States Secretary of State designated al- Qaeda in Iraq (AQI), then known as Jam 'at al Tawid wa' al-Jahid, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL)

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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.

9. Beginning in 2014, using social media, ISIS has called for attacks against citizens – civilian and military – of countries participating in the United States led coalition against ISIS. For instance, on September 21, 2014, ISIS released a speech of Abu Muhammad Al-Adnani, a senior leader and official spokesman of ISIS. In this speech, entitled, “Indeed Your Lord is Ever Watchful,” Al-Adnani calls on Muslims who support ISIS from around the world to “defend the Islamic State” and to “rise and defend your state from your place where you may be.” More recently, using social media, ISIS has been encouraging individuals to kill specific persons within the United States.

Probable Cause Statement

10. Zakaryia Abdel Abdin, (“Abdin”), a natural born U.S. citizen and a resident of Ladson, SC, has been the subject of an FBI investigation in the District of South Carolina.

11. During the course of the investigation, information was obtained from by a Social Media Provider (SMP), SMP-1, regarding vanity name provided a creation date of January 3, 2017 with an IP address of The IP address was determined to be provided by an Internet Service Provider (ISP), ISP-1, and was later identified as belonging to the residence of Abdin. Additionally, information provided by SMP-1 regarding vanity name provided a creation date of January 5, 2017, with the same IP address provided by ISP-1, resolving to the residence of Zakaryia Abdin.

12. The investigation revealed that on or about January 7, 2017, Abdin attempted to purchase a

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long gun from a retail store in North Charleston, South Carolina, and that on that same date, Abdin attempted to purchase a used New England Firearms (NEF), single shot, .308 Winchester caliber rifle, serial number NM295031.

13. On about January 13, 2017, Abdin contacted the FBI Columbia-Charleston Resident Agency at the suggestion of South Carolina Law Enforcement Division (SLED) Agents and scheduled an interview. On or about January 20, 2017, Abdin visited the FBI Columbia-Charleston Resident Agency in Mount Pleasant, SC to meet with SA Clinton Pierce. During this interview, SA Pierce advised Abdin about the FBI's role in conducting counterterrorism investigations and outlined for him various statutory definitions. SA Pierce provided the definitions for terrorism and specifically told Abdin that ISIS was a designated foreign terrorist organization (FTO) and that it was illegal to give any FTO any form of material support, including personnel. Abdin indicated that he understood these things. In fact, during the interview, Abdin stated that he wanted nothing to do with his past actions and claimed that he had completely disassociated himself with extremist ideology. Abdin stated that he purchased a 7mm-08 single-shot hunting rifle to be used for hunting and would like to obtain a hunting license. Abdin's purchase was confirmed by way of a transaction record detailing Abdin's purchase on or about 01/10/2017 where Abdin returned a New England Firearms (NEF), Single Shot Win .308 rifle, Serial number: C1NM295031, originally purchased on 01/07/17 for \$99.99, plus \$8.50 sales tax. A hand written note on the receipt stated, "Buying new gun when money returns to credit card", "new gun", and "010633017085". The January 19, 2017 transaction record detailed a firearm sale to Abdin for a New England Firearms, model SB2, Handi-Rifle Youth, 7mm-08 caliber, with serial number CBA436519 for \$224.99. Other items purchased during this visit included a Traditional Red Dot: 1x30mm optic for \$39.99, and one box of American Whitetail 7mm ammunition for \$24.99. In addition, during the interview on January 20, 2017 with the FBI, Abdin stated that he had only one SMP-1 account.

14. On or about January 25, 2017, a South Carolina Law Enforcement Division (SLED) Special Agent returned several missed phone calls from Abdin. During the conversation, Abdin wanted advise the SLED Special Agent that he picked up his hunting rifle purchased from the retailer in North Charleston, SC. Abdin stated he had been shooting the long gun at the range and indicated that he had shot other guns while at the range as well. Abdin further stated that the firearms were temporarily rented at a price of \$5.00 each; however he did not provide further details on the type of firearms he was shooting.

15. The investigation revealed that on or about January 27, 2017, Abdin visited a Summerville, SC gun shop and range and that Abdin rented an AK style rifle to shoot at the range. An "AK style" rifle is a type of semi-automatic rifle is similar to an AK-47. On the same date, Abdin purchased matching ammunition and utilized the range to fire the rifle. FBI obtained video footage from the range which depicted Abdin, wearing an orange in color t-shirt, filming and/or using the photo feature on his cellular phone to capture a video or image of himself shooting the rifle. In addition, the investigation revealed that Abdin had rented an "AK" style rifle and firing range lane on or about January 19, 2017, and on January 20, 2017, and purchased ammunition. The investigation further revealed a video posting on SMP-1 and the username of the account that posted the video. The video on the SMP-1 account belonged to [redacted] with SMP-1 vanity name [redacted]. FBI review of the video appears to show an individual, whose upper body has been cropped from the footage, firing an AK-47, and wearing an orange in color t-shirt. Your affiant believes that the individual in the video from the [redacted] posting is Abdin at the gun shop and range in Summerville, SC, due to the date of the posting on or about January 27, 2017, the style of weapon being utilized and the corresponding video footage from the Summerville, SC gun shop and range.

16. Observations made during a physical surveillance in Ladson, SC and surrounding areas on or about February 9, 2017, of Zakaryia Abdin identified Abdin operating a Toyota 4Runner with SC

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license plate (a vehicle which is registered to Abdin's mother and a vehicle known to be operated by Abdin), visiting a pawn shop in North Charleston, SC, as well as an additional retailer in North Charleston, SC. The investigation revealed that Abdin visited the pawn shop on two separate occasions, once on or about February 2, 2017, and also on or about February 9, 2017. Records obtained from the investigation detailed that on or about February 2, 2017, Abdin conducted business by selling a 7mm-08 caliber, semi-automatic Handi-Rifle, Serial number: CBA436519. The rifle was sold to the pawn shop for \$150.00. During physical surveillance on or about February 9, 2017, Abdin pawned a bolt action .22LR caliber Marlin rifle, Serial number 91641268, with an extra magazine and received \$100.00. During physical surveillance on February 9, 2017, Abdin was identified by a North Charleston, SC retail store manager as the purchaser of two 30 round magazines for an SKS-A4. The investigation revealed that Abdin also looked at and photographed two weapons while in the store: A semi-automatic Ruger .22 Charger and a bolt action Ruger American .308 rifle.

17. Observations made during a physical surveillance of Abdin in Ladson, SC and surrounding areas on or about February 16, 2017, identified Abdin operating a Toyota 4Runner with SC license plate visiting a gun shop and range in the vicinity of Summerville, SC. In the parking area of the gun shop and range, Abdin met with an unknown male (later identified), the driver of a black in color Ford Sports Trac near the rear compartment of the Toyota 4Runner. Subsequently, the FBI visited the Summerville, SC gun shop and range and obtained information indicating that on or about February 16, 2017, Abdin visited the South Carolina gun shop, and rented a pistol range and a rifle range lane, as well as purchased of a box of 7.62 x 39mm rifle rounds, a target and target clips. This type of ammunition is used in SKS semi-automatic rifles. Furthermore, a hand written note on a transaction receipt noted that Abdin had in his possession a Smith and Wesson, M&P 9mm handgun bearing serial number HNJZ71Z. Video footage from the gun shop and range showed Abdin's meeting in the parking area of the gun shop and range with an individual operating a Ford Sports

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Trac. After the meeting in the parking area, Abdin entered the gun shop and range with a rifle case and a small box. After review, the FBI assesses the small box to be a manufacturer's pistol case.

18. On or about February 19, 2017, Abdin, utilizing a social media platform (SMP-2) account invited an FBI Undercover Employee (UCE-1) to chat over the SMP-2 application. This UCE's objective was to operate and interact online. Your affiant believes that Abdin believed UCE-1's online persona as being an ISIS facilitator, and further that the UCE-1 could assist Abdin in joining ISIS overseas. During the course of communications, UCE-1 asked Abdin if he had given "bay'ah" [sworn allegiance] to the Caliphate [ISIS]. Your affiant is aware that giving "bay'ah" or pledging allegiance to ISIS's purported caliphate is a means of dedicating oneself to ISIS and the group's terrorist organized mission of establishing a global caliphate through global jihad. Abdin replied that he had given "bay'ah" to a brother in Bilad al rafidayn [Iraq]. Abdin explained, "I am in amrika [United States] my akhi [brother]. I gave my bay'ah in 2014 to amir al mu'mineen Ibrahim Ibn awwad as sammari al husayni al qurayshi al Baghdadi" (the person referenced by Abdin is the leader of ISIS). "We were

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supposed to make it to Gazientep [city in Turkey] and from there to manbij [Syria]...". Abdin also told UCE-1, "I need to get out my akhi. Please help...this kuffar [disbelievers] is killing me. I do not want to be left behind with these kuffar and murtadeen [Apostates]." Later, Abdin told UCE-1 that he was very concealed and therefore keeps his thoughts to himself, stating "so now this time I can get out of this filth biithnilah [God willing]".

19. In the same conversation on or about February 19, 2017, Abdin was asked where is it that he would like to make hijra² [migration]. Abdin responded "Wilayat Sayna" [Sinai Province, Egypt], but stated "if my dawlah [ISIS] needs me in Yemen I will take it in a heartbeat." Abdin went on to explain, "I have good experience in close combat...I have taken gun courses. And I have shoot [sic] a lot of guns. SKS. Pistols. Kalahnikov. I can reload any gun with ease." UCE-1 asked if Abdin had been in the U.S. military and Abdin responded, "Those tawaghet [tyrants] only want me to attack the muslimun [Muslims] I will never join them astaghfurallah [God forgive us].. I will spit on there [sic] dead". Abdin further responded, "I do not fear death akhi my gosl [sic]" and "I want you to try your best to get me out of here as soon as you can. If something goes wrong then I will continue my kifaah³ [struggle] here [in United States]." Abdin further advised UCE-1 that he would like to make hijra "as soon as possible. I want to leave by this month or next month", and stated "I am well prepared and I am also a mechanic." Abdin explained his happiness in making hijra with the UCE-1 as a guide and stated "I have gave up everything for this. This is all I want. To live under the banner of tawheed [Ones of Allah] and get my shahada [martyrdom] under it."

20. On or about February 21, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. During this conversation Abdin told UCE-1 that he found his Passport and also said that he was going to attempt to renew it, and pay the extra \$95 to expedite the process and receive it in two weeks. Abdin stated, "we must keep a very close and extremely private

² Hijrah is historically, an Arabic term that means "migration" and in this context means travel for the purpose of committing jihad.

³ Kifah refers to a major struggle, such as the struggle to achieve freedom from tyranny.

connection...my situation is very different then some of the other ikhwa [brothers].. But alhamdulillah [praise to God] It was just a test from Allah...and a test of sabr [patience]. Abdin continued the conversation stating he has the "tawaghet [Tyrants] fooled" (a term that likely refers to law enforcement and others in the United States into thinking he is conforming to societal norms. Abdin stated "I need to get out of here as soon as possible...for the sake of Allah help me as much as you can." UCE-1 advised Abdin that they (the UCE and fellow ISIS brothers) will do what they can and asked if Abdin had a job to pay for his travel. Abdin responded that he is a mechanic and in one month could come up with approximately \$1200. Abdin further stated that the U.S. officials have no choice but to let him travel as long Abdin has a good excuse to do so. During this conversation, Abdin sent UCE-1 a photo of the cover of a U.S. passport stating, "I want you to know who you are dealing with". Then Abdin sent another photo of a masked person holding what appears to be a rifle and stated, "This is me. So I want you to believe me. I am real akhi." UCE-1 responded and said that Abdin's photo looks like a real mujahid [fighter], to which Abdin replied, "Yes, I am longing for it...I want the ikhwah to know that I am very reliable in close combat...I require no training."

21. In the same conversation UCE-1 informed Abdin to "remember once you come here you will have to kill and you will see dead people including many dead friends. Are you prepared to kill? Walahi some of the brothers from the west when they come they get scared and want to go back." Abdin responded, "Akhi. What question is this? WALLAHI [I SWEAR] I want to kill and be killed. I run towards the enemy like a lion to a sheep." "I am longing to be with my ikhwah [brothers]. I dislike being alone here in the US... Rafidi [Shia muslims], murtadeen, kuffar, PKK [Kurdish Workers' Party], all of these I have no problem and no sadness to kill".

22. The conversation from February 21, 2017, continued between Abdin and UCE-1, wherein Abdin described the excuse he had come up with to travel. Abdin stated "my excuse is...I am going to the dead sea for vacation off work". Abdin then advised UCE-1 that he was under "high

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watch,” which is why he must leave very soon. Abdin said that he planned to be overseas with UCE-1 in two months or less.

23. On or about February 24, 2017, Abdin contacted the FBI Columbia - Charleston Resident Agency to speak with SA Clinton Pierce. During this telephonic conversation, Abdin informed SA Pierce of his intent to travel to Jordan for vacation, and more specifically, to visit the Dead Sea. FBI assesses, based on Abdin’s conversation with UCE-1 on February 21, 2017, that ABDIN called the FBI to provide the same false purpose for travel he previously discussed with UCE-1 in order to mislead and preempt suspicions developed by the FBI once he scheduled his travel.

24. On or about February 22, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. During this conversation Abdin told UCE-1 that he will be renewing his passport tomorrow and should get it back in two weeks. Once the passport is returned, Abdin advised that he would book a flight to join up with the ikhwah in the coming month. Abdin believed he would have the \$1200 dollars needed to travel by that time. However, Abdin told UCE-1, “If something goes wrong and I feel like a *[sic]* will get caught...I am prepared to do anything you need here.. Biithnilah [God willing]. Anywhere.” You affiant believes that Abdin was offering to conduct an attack on behalf of ISIS in the U.S. if he discovers that he cannot travel overseas to join UCE-1 and ISIS.

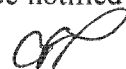
25. On or about February 24, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. During this conversation, Abdin was traveling to renew his passport, but informed UCE-1 that he they could not renew the passport because it expired last year. Abdin said that he would be required to request a new passport, which would take four to six weeks, but Abdin decided to pay the \$95 to receive the passport in three weeks. Abdin stated “I will book the flight and leave immediately after I get it.” Abdin requested monetary assistance from UCE-1 if Abdin came up short, however UCE-1 explained that assistance to other ikhwah from poverty stricken

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countries was a priority. Abdin responded, "Yes of course akhi. These ikhwah in poor countries need our help. Please help them. I can make money." Abdin then explained to UCE-1 that he would apply for his new passport and once he received it in three to four weeks, he would have approximately \$900 in hand. Additionally Abdin stated "then I will sell my gun for 800\$ [sic] and add them to the 900\$ inshallah... that will leave me with a tight 1700\$ so after I book a flight I will have only \$400 left".

26. In that conversation on February 24, 2017, Abdin also discussed travel necessities such as food and bullets. Abdin then questioned the instructions on how he was going to meet UCE-1 at the airport in Amman, Jordan. Abdin shifted the conversation and told UCE-1 his intentions of coming to join the ISIS caliphate. Abdin stated "my intention is to help the oppressed muslimen and make sure Sharia of Allah swt [the Almighty] is law that is being place and Muslims are united under the Rayah of Tawheed [The banner of Tawheed or under one God]. UCE-1 told Abdin news of U.S. Military troops assisting the Egyptian Army near the Sinai Province, and advised that Abdin may have the chance to engage them in battle. Abdin responded, "Allahi akbar!!! [Praise be to God]", "Yes inshallah. I want to be assigned to a sniper unit inshallah if possible." Abdin continued by stating "I want to be assigned where I have experience. Either a sniper unit or a close combat unit. Building to building." Abdin then asked UCE-1 to "please make dua [prayers] for me akhi. I am in need. This is the will of Allah."

27. On or about February 26, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. During this conversation, Abdin stated that he almost had half of the ticket price to travel saved up and by the time he receives his passport, he should have enough money for the ticket. Abdin provided UCE-1 a tentative travel date between March 25th to April 1st. Abdin then stated that he was expecting the "taghut" [tyrants] to knock on his door since he has submitted his passport application. Abdin explained, "the Federal Police will be notified after



I make the passport. So there is a good chance they will knock on my door to ask where I am going and why I applied.”

28. On or about March 1, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin advised UCE-1 that he was making a list of items to bring with him on his travel. Abdin then asked questions of UCE-1 regarding arrival at the airport, stating “when I come where do I go and who will pick me up and when and how will I contact with no Internet *[sic]*?” Abdin stated that he has been to that airport before, but did not know where to go once inside. UCE-1 reassured Abdin that they (ISIS associates) would find him and join him with the ikhwah, but since Abdin did not want to send a picture, they had needed another way to identify him. Abdin asked how he could send UCE-1 a picture on SMP-2 and later sent two photos of himself to UCE-1. Both photos show the face of Zakaryia Abdin. UCE-1 confirmed that when Abdin landed at the airport in Amman, Jordan, Abdin would be easily identified now that photos had been received. Abdin requested photos of ikhwah, “the ones in the khilafah [Caliphate]”, from UCE-1. Abdin then stated, “when I am in wilayat Sayna [Sinai Province, Egypt] I will speak for them in any video message they want wallahi. And my image will be all over the world.”

29. Later in the March 1, 2017, conversation, Abdin made a request to UCE-1 and stated the following: “Akhi I am my mom’s only son. She raises me 17 years and I told her I am just going on a simple vacation. So. Inshallah. When I arrive it will break her heart if I do not return and she does not know where I am”; “So is there anyway *[sic]* I can send her a picture of myself in wilayat Sayna. Just to her inshallah?”...”She has every right to know that I have choosen *[sic]* this path and she will at least know where I am and I will not return.”

30. On or about March 2, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. During this conversation, Abdin asked UCE-1 “what name am I saved under?”, referring to the kunya or nickname provided by ISIS. UCE-1 informed Abdin that the name



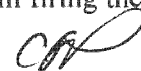
assigned to him is "Muwahid al Amriki", and Abdin replied "ok. I am known as Ibn Abdelhalim Al Amriki". Abdin continued in the discussion with UCE-1, stating his desire "to go to the frontlines" and stating "blood and death does not frighten me." Abdin stated that he would like to be "put in a sniper unit or make house to house raids", and advised, "that is all I want akhi. Just to be with the ikhwah and fight alongside. I have been longing for that."

31. Later in the conversation from March 02, 2017, Abdin informed UCE-1 of his expertise in vehicle repair, but stated "In an emergency I don't mind working on cars but I prefer fighting, fighting, fighting."

32. On or about March 3, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin provided an update to UCE-1 from the passport agency, stating that he was advised that he should receive the passport "anywhere from 10 days to no longer than March 23..." Abdin then informed UCE-1 of a strange occurrence where he believed a black vehicle was following him and stated "looks like tawaghet [tyrants] car following me..." Abdin then asked UCE-1 if the ikhwah will have clothes and boots large enough to fit him, stating "I have very big feet and I am XX large in clothes. Will the ikhwah also have clothes available to combat?"

33. On or about March 2, 2017, a U.S. Passport Acceptance Agent at the Cross County Branch of the United States Postal Service, North Charleston, SC, received and processed Abdin's Application for a U.S. Passport.

34. On or about March 3, 2017, Abdin sold his SKS rifle for \$425.00 to an individual who unbeknownst to Abdin, was an FBI Undercover Employee (UCE-2). The transaction of the rifle included additional items, to include: 107 rounds of loose .22 caliber ammunition; 50 rounds (one box) of .22 caliber ammunition; 40 cartridges (one box) of 7.62x39mm ammunition; 9 cartridges of loose 7.62x39mm ammunition; one 30 round capacity 7.62x39mm magazine; one 10 round capacity 7.62x39mm magazine; and one soft-sided rifle case. During the transaction, Abdin demonstrated the functionality of the rifle and stopped to show UCE-2 a video of him firing the rifle at



night at a location he described as a local range, to prove the rifle would fire. Additionally, Abdin demonstrated how he modified the SKS rifle to take off the original ten round magazine and install the 30 round magazine.

35. Your affiant believes that Abdin's early January purchase of the Handi-Rifle, 7mm-08 from a major retailer in North Charleston, SC was an attempt to ascertain whether he could legally purchase a firearm, as well as an attempt to distract law enforcement by purchasing an inconspicuous firearm which fit the self-established narrative of an interest in hunting wildlife, as he described in his January 20, 2017, meeting with the FBI. Additionally, Abdin pursued proficiency with other firearms, specifically an AK-47, an SKS rifle, and a 9mm handgun, at the above mentioned gun shop and range and potentially other locations. Your affiant further believes that Abdin also pawned the Handi-Rifle, 7mm-08 on February 2, 2017, in an attempt to acquire money to purchase the SKS rifle by way of a person-to-person transaction, thus avoiding the filing of required firearms purchase forms at a retail store, which could alert law enforcement.

36. On or about March 5, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. During this conversation, Abdin advised UCE-1 that he almost had enough money to purchase the plane ticket to Amman, Jordan and was awaiting the arrival of his passport. Abdin stated "I sold my rifle to help... Now I am going to sell my last and final weapon. After that I should be good..." Abdin then sent UCE-1 a photo of his handgun and later told UCE-1, "It's a 9mm akhi".

37. Your affiant believes that the March 3, 2017, sale of the SKS rifle was in furtherance of obtaining the necessary funds to pay for a plane ticket. In a conversation between Abdin and UCE-1 on February 24, 2017, Abdin stated "I will sell my guns for 800\$ [sic] ... after I book a flight I will have only \$400 left." Your affiant believes that Abdin was referring to the future sale the SKS rifle and the 9mm handgun in his possession.

38. Later in the March 5, 2017, conversation, Abdin inquired about the process upon his



arrival in the Jordan airport, stating "As I looked online. It said I needed a US passport and a Jordan visa". Abdin continued to ask questions of UCE-1 regarding arrival and departure from the Jordan airport, as well as whom he would be meeting with to be joined with the other ISIS brothers. Abdin then sent UCE-1 two pictures of himself and stated "Don't save it now...Just look and memorize my face".

39. On or about March 7, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin explained his concerns about being discovered by the Assad regime in Syria, stating "they are looking for me and they have my name in the system". Abdin, however, said that he did not believe that he would be discovered if he travels to Jordan. Abdin then sent UCE-1 photos of a Starbucks coffee shop, stating "I looked online and found it in the Amman airport...I was thinking maybe we can meet if it would be easier". FBI assesses Abdin researched locations at the Amman, Jordan airport as potential meeting locations to be picked up by UCE-1.

40. On or about March 10, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. ABDIN requested an update from UCE-1 and was advised of potentially being placed in a position as a team leader of twelve ISIS fighters. Abdin responded "Al Arish [Egypt] will be my favorite and we will capture it biithinilah". Abdin further stated "me and my men will capture it or gain shahada [Martydom] and we will raise the flag of tawheed over it..." Abdin then discussed other likeminded individuals in the United States who support ISIS but do not know how to contact the caliphate and cross borders, stating "they eventually get arrested and sentenced a lot of years. And there are some who get so angry with kuffar and seek there *[sic]* shahada immediately". Abdin then asked UCE-1, "Did our akh [brother] Omar Mateen contact the ikhwah in Khilafah. Here they say he just did it on his own?" UCE-1 responded affirmatively to Abdin's question and Abdin responded "They will pay the price with their blood."

41. The March 10, 2017, conversation continued Abdin also discussed the likeminded individuals he meets online and the support they provide one another. However, Abdin stated,

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“We are most likely to contact an undercover agent than a real brother.” Abdin continued, “That is why I carry guns in my house, in my car and even I used to take secretly to school. It is very humiliating to get captured.” Your affiant believes that this comment by Abdin describes his intent to engage law enforcement in an armed confrontation if there was an attempt to apprehend him.

42. On or about March 11, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin asked UCE-1 if he (Abdin) could send a video of his bay’ah [pledge of allegiance] to UCE-1, stating “I was thinking about making a bayah [*sic*] and sending it to you before I leave...Since my old one is destroyed”. Later in the conversation, UCE-1 provided Abdin with an email account address to send the video. Abdin explained that he was on break from work, but would send the video later to the provided email account of UCE-1. During the conversation, Abdin discussed ways to circumvent suspicion during his trip and to appear as though he is traveling as a tourist. Abdin stated “should I cut my hair short also?” and “I need to look as much as a tourist as I can”. Abdin asked, “should I bring cigarettes with me just in case they search I would look to them as a moderate?” Additionally, Abdin stated he would be leaving as soon as the passport arrives and stated, “These kuffar know me here so I am just trying to outsmart them”.

43. On or about March 12, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin informed UCE-1 of email account problems, but said that he would send a video to UCE-1. Abdin requested the email account of UCE-1 and once provided to him, Abdin stated, “Ok it’s sending.... Since Arabic is not my original language I might mispronounce one word or two...”. UCE-1 confirmed receiving the video and Abdin stated that he would deleting all contents of his entire phone and would contact UCE-1 from a new account.

44. In the video that Abdin sent UCE-1, Abdin, with nearly his entire face covered except for his eyes, pledged allegiance to ISIS in the Arabic language. The verbatim English translation is as follows:

[Praise be to Allah and peace and blessings to the one who was sent as a mercy to the world [The prophet]. I am pledging allegiance to the Emir of the faithful Abu Bakar Al Hussein Al Qurashi Al Baghdadi, and to be obedient during hardships as well as prosperity. I will not argue about the orders unless I see unmitigated kufr. I pledge to establish the religion of Allah, to rule according the Sharia of Allah, to wage jihad against the enemy of Allah and to establish an Islamic State. God is my witness.]

45. On or about March 14, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin offered to travel with items at the request of UCE-1, wishing to bring UCE-1 something as a gift, stating "I am going to bring you good chocolate inshallah....Or miswak [Toothbrush]". Later in the communication, Abdin states, "Akhi I will corner the enemies biithinilah [God willing]. These soldiers I train will fight like solid rocks akhi. Biithinilah". Then after speaking to UCE-1 he was told about a supposed potential American recruit who refused to join ISIS after learning he would likely fight U.S. military soldiers, Abdin stated "Authobilah?!?! [We seek refuge to Allah/God forbid] Why is he doing that!!!" and "Wallahi I will attack them and never turn my back." Abdin further stated "Did you give him Amiliyat ishtishadiyah? [Martyrdom operations]....Or just simple fighting or frontlines". Abdin expressed his anger regarding the supposed American's choice to reject fighting U.S. Soldiers and stated "Just because he did that ... I want you to place me on the frontlines just to fight Al Amrikan [The Americans]", "Please place me against the Amrikan [The Americans] ... Please akhi please. Just Amrikan I will fight them until death wallahi wallahi wa wallahi [I swear, I swear and I swear]". Abdin then states, "That is my ultimate goal akhi. PKC full loaded akhi. Corner to corner and door to door inshallah". Your affiant believes that Abdin is referring to engaging U.S. military service members as an ISIS fighter. Your affiant believes that when Abdin referred to a "PKC" he was referring to a Kalashnikov-PK, a gas operated, belt fed, fully automatic machine gun which fires a 7.62x54mm ammunition.

46. On or about March 15, 2017, Abdin, utilizing account invited UCE-1 to chat



over the SMP-2 application. Abdin asked UCE-1, "Do we have any Captive Amriki in wilayat Saynaa [Sinai province]? In which I can send a message to the Gharb [To the West] Inshallah?" and states "I want to be the one to send the message because they will know who I am and I want them to see". Your affiant believes that Abdin is asking UCE-1 if ISIS currently has captured any American hostages and if so, Abdin was saying that would like to be the ISIS operative involved in the video where the hostage is tortured and/or killed. Abdin further stated, "Keep the one in Saynaa [Sinai Province, Egypt] for me inshallah please let them know...", "Save him for me akhi. I do not need to cover my face for that. I will send a good message inshallah", and "Hide that khanzer [Pig] good akhi...I want to get my revenge biithinilah [God Willing]. Abdin then stated, "I want to be the one to do it because I am Amriki like him also...It will be a strong message Inshallah".

47. On or about March 16, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin advised UCE-1 about his current passport status stating, "I am at 2 weeks exact. I paid extra to get my passport in 2 to 3 weeks. So from now to next week it should be in my hands inshallah." Abdin then informed UCE-1 about the status of his passport, and that his plane ticket to Jordan will cost approximately \$1,300.00 and stated "I can get a one way ticket for 700\$ [sic] but that will be suspicious if they ask me why I am going and not coming back". Abdin continued later, "When I am in Saynaa [Sinai Province, Egypt] I want to focus on one thing but I will help with the others if asked akhi". When questioned by UCE-1 what Abdin would like to focus on, he stated "Mainly Amrikan [Americans]. Because I know how they work. But don't worry I will still help with others akhi".

48. The conversation from March 16, 2017, continued between Abdin and UCE-1 where Abdin discussed the rejection of an arranged marriage and stated "if I am going to get married it will distract me from Jihad fisabililah [Jihad for the sake of Allah]. Then I will have to worry about providing and working..." and "So if I marry it will be in the Khilafah or hur al ayn biithinilah". FBI assesses Abdin's use of "hur al ayn" refers to the women in heaven.



49. On or about March 17, 2017, Abdin, utilizing account invited UCE-1 to chat over the SMP-2 application. Abdin told UCE-1, "If I do not get my passport then you will see, Wallahi you will see and I will let you and the brothers meet up and discuss what you need me to do in Dar Al Harb [The land of War]". Your affiant believes that Abdin is offering to commit an act of terrorism in the U.S. if his passport is not received. Abdin also said, "I finished my last training yesterday night alhamdulillah [praise to God]....Getting prepared very soon inshallah I sold my SKS so I did some night range training with the 9mm". Abdin sent UCE-1 photos of a pistol being fired at in low light or darkness and another photo of an apparent pistol being carried inside the waist-band of clothing by an individual assessed to be Abdin. Abdin later referred to money saved toward his plane ticket and the arrival of his U.S. passport, stating "I got 1000\$[sic] saved alhamdulillah.....It should come before Thursday. If it comes Thursday, Ill [sic] be leaving Friday biithinilah taala". Abdin then questioned UCE-1 about his hair style and length, as well as appropriate clothing to wear when traveling overseas to avoid suspicion, sending UCE-1 photos of himself where his face was not pictured. One of the photos depicts an Abdin wearing a red baseball hat with hair length past his ears with a comment after the photo stating "Is this hair ok? Or does it look suspicious?" Abdin followed with the second photo of only the top of his head and hairline. Abdin continued to question UCE-1 regarding food available to fighters for ISIS, to which UCE-1 replied to Abdin, "if you are worried about life in wilayat Sinai [Sinai Province, Egypt], please you can now change your mind and stay [in the U.S.] before you spend so much money and fly out here biithinilah [God willing]". Abdin replied, "Akhi you made me laugh... Akhi I am coming to fight. Not to play video games and sit..." and "You think I will change my mind after what they did. Wallahi and wallahi [I swear and I swear] I will never back down until they all make sujood [bow] to Allah azawajal [The almighty]".

50. Later in the conversation from March 17, 2017, Abdin requested to tell UCE-1 a comment in confidence and stated, "Oqsim billah [I swear to God] ... I was very close to doing

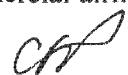


what our akh [Brother] ... Omar did ... And subhanallah ... I made a dua to Allah swt [I prayed to God] to give me a chance to make hijrah [migration] and unite me with the ikhwah in Khilafah [Brothers in the Islamic State/ISIS]". FBI assesses Abdin was referring to conducting a similar attack to that of Omar Mateen, who on June 12, 2016, attacked the Pulse Nightclub in Orlando, and killed 49 people and wounded dozens more. Abdin then continued, "I heard all over the news when he did it ... And I was going to do the same thing one month later ... But I did not have weapons ... So I saved and saved ... Got weapons ... And made that dua [prayer] before I was going to go out ... And subhanallah now I will be making my hijrah alhamdulillah ... So now I sold most of my weapons for ticket." UCE-1 then asked if Abdin had been close to becoming a "shahid" [Martyr] and Abdin stated, "Yes akhi. Very close. Wallahi I almost got in my car and left for location but I just made the dua and said it is better to wait few more days and see if Allah swt will answer or let me continue ... Wallahi [I swear] akhi [brother] and ... I did not care ... So I posted on Me and my guns and my gear about to go soon".

51. On March 22, 2017, the FBI was notified Abdin's passport was delivered to his residence in Ladson, SC. Later on the same date, Abdin utilizing account , invited UCE-1 to chat over the SMP-2 application. Abdin informed UCE-1 of the arrival of his new U.S. Passport, stating "ALLAAAAHU AKBAR" and "Please akhi, let the brothers know I am coming very soon biithinilah".

52. On March 23, 2017, Abdin made flight reservations aboard a commercial airline departing Charleston, S.C. with a final destination of Amman, Jordan. The date for travel was set for March 30, 2017 at approximately 7:30 PM. Shortly thereafter on March 23, 2017, Abdin communicated to UCE-1 that he was scheduled to arrive in Amman, Jordan on April 1, 2017, at approximately 2:05 AM.

53. On March 30, 2017, at approximately 4:17 PM Abdin arrived at the Charleston International Airport with one piece of luggage and a carry-on backpack. Abdin proceeded to a commercial airline



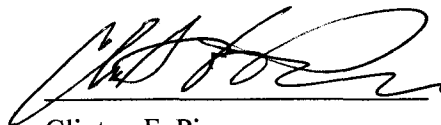
ticket counter where he provided the attendant with travel documents and received a boarding pass for international travel to Amman, Jordan. Abdin then proceeded from the ticketing counter toward the Transportation Security Administration's security screening area.

Conclusion

52. Based on the foregoing, your Affiant believes that there is probable cause to show that between on or about January 03, 2017, and on or about March 30, 2017, Zakaryia Abdel Abdin attempted to provide material support, including personnel, to ISIS, a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B(a)(1), and that Abdin committed overt acts in furtherance of his attempt to provide material support in the District of South Carolina.

This affidavit has been reviewed by Assistant United States Attorney Sean Kittrell

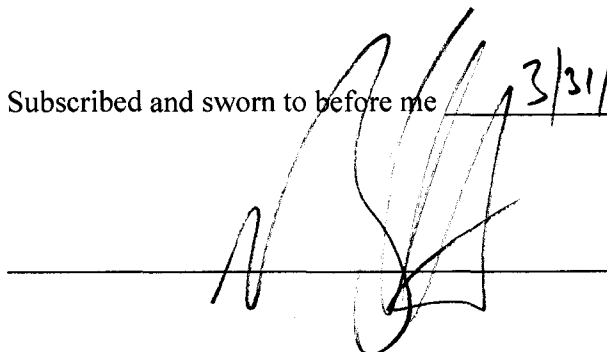
Respectfully submitted,



Clinton F. Pierce
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me

3/31/17



BRISTOW MARCHANT
UNITED STATES MAGISTRATE JUDGE