

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Special Agent T.A. Staderman, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation and have been a Special Agent since 2008. As a Special Agent, I have been assigned to investigate various Domestic and International Terrorism matters and am assigned to the FBI's Cincinnati-Dayton Joint Terrorism Task Force. As a result of my training and experience, I am familiar with the tactics, methods and techniques of terrorist networks and their members, including use of computers, cell phones, social media, email, and the internet in connection with criminal activity.

2. I make this affidavit in support of a Complaint charging **MUNIR ABDULKADER** with violating Title 18, United States Code, Section 2339B (Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization); Title 18, United States Code, Sections 1114 and 1117 (Conspiracy to Kill a Government Employee); and Title 18, United States Code, Section 924(c) (Possession of a Firearm in Furtherance of a Crime of Violence), on or about May 21, 2015, in Cincinnati, Ohio, in the Southern District of Ohio, and elsewhere.

3. The facts in this affidavit are based on my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

4. Title 18, United States Code, Section 2339B prohibits, in pertinent part, a person from knowingly providing material support or resources to a foreign terrorist organization, or

attempting or conspiring to do so. The term “material support or resources” means any property or service, which may include currency, financial services, lodging, training, expert advice or assistance, weapons, explosives, personnel, and transportation.

5. Title 18, United States Code, Section 1114 prohibits, in pertinent part, a person from “attempt[ing] to kill any officer or employee of the United States or of any agency in any branch of the United States Government . . . while such officer or employee is engaged in or on account of the performance of official duties.” Title 18, United States Code, Section 1117 prohibits, in pertinent part, two or more persons from conspiring to violate Section 1114, provided that “one or more of such persons do any overt act to effect the object of the conspiracy. . . .”

6. Title 18, United States Code, Section 924(c), in pertinent part, prohibits a person from possessing a firearm in furtherance of a crime of violence.

Background on ISIL

7. On October 15, 2004, the United States Secretary of State designated al-Qa’ida in Iraq, 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 and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

8. On May 15, 2014, the Secretary of State amended the designation of al-Qa’ida in Iraq as a Foreign Terrorist Organization 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 also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham (ISIS), the Islamic State of Iraq and Syria (ISIS), ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-

Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production (all collectively referred to herein as “ISIL”). Although the group has never called itself “Al-Qaeda in Iraq,” this name has been frequently used to describe ISIL throughout its history.

9. United States law enforcement agents, including members of the Cincinnati-Dayton JTTF, have been investigating individuals located in the United States who are trying to provide material support to designated foreign terrorist organizations, including ISIL.

Background on MUNIR ABDULKADER

10. From my participation in the investigation, including my review of FBI reports, communications, and recordings of the Defendant’s statements, I have learned the following:

- a. At all times relevant, **MUNIR ABDULKADER** has resided in West Chester, Ohio, the Southern District of Ohio.
- b. **MUNIR ABDULKADER** became a citizen of the United States on September 22, 2006.
- c. During 2014 and 2015, **MUNIR ABDULKADER** has been a college student at a university in Cincinnati, Ohio.

11. Beginning in at least July 2014 and continuing to 2015, **MUNIR ABDULKADER** established and used Twitter accounts. Using his Twitter accounts, **MUNIR ABDULKADER** posted statements, videos, and other content indicating his support for ISIL. **MUNIR ABDULKADER** posted an ISIL training video, lamented that his cousin had died fighting for ISIL, stated that he supported ISIL, expressed his desire to travel and join ISIL, and expressed his desire to attain “shahada” [martyrdom].

MUNIR ABDULKADER's Plans to Travel to Join ISIL

12. In January 2015, **MUNIR ABDULKADER** applied for a passport and instructed that the passport be delivered to an address that was not his residence.

13. From approximately March 2015 to mid-April 2015, **MUNIR ABDULKADER** began speaking with a Confidential Human Source (CHS) about his (**MUNIR ABDULKADER's**) desire and intention to travel to Syria in order to join ISIL as a fighter. From approximately March 2015 through at least April 2015, **MUNIR ABDULKADER** made plans and preparations to travel to Syria to join ISIL as a fighter. He expressed his support for ISIL, expressed his intent to become a fighter for ISIL, secured a passport, saved money for the trip, and researched the logistical details of traveling to and joining ISIL.

14. For example, **MUNIR ABDULKADER** spoke with the CHS on March 19, 2015. During that meeting, after **MUNIR ABDULKADER** told the CHS about his (**MUNIR ABDULKADER'S**) plans to travel to Syria and join ISIL, the CHS asked when he (**MUNIR ABDULKADER**) would travel. **MUNIR ABDULKADER** stated he was still waiting for his passport and it had been 7 weeks since he sent in his application. **MUNIR ABDULKADER** stated that he called numerous times to inquire about the passport. **MUNIR ABDULKADER** stated he definitely wanted to be a fighter "for sure, for sure, for sure," and that he knew there were big consequences. The CHS asked if **MUNIR ABDULKADER** considered other jobs if he could not be a fighter. **MUNIR ABDULKADER** replied that "Shahada" [martyrdom] was the only thing that was on his mind.

15. In approximately late April 2015, **MUNIR ABDULKADER** expressed concerns about the number of arrests of individuals who were trying to travel to join ISIL. He researched other options and postponed his original departure date of approximately May 2, 2015.

MUNIR ABDULKADER's Plans to Attack Locally.

16. The CHS informed your affiant, that according to **MUNIR ABDULKADER**, during May 2015, **MUNIR ABDULKADER** was in electronic communication with one or more individuals located overseas who are members of ISIL. Through those communications, the overseas member(s) of ISIL directed and encouraged **MUNIR ABDULKADER** to plan and execute a violent attack within the United States.

17. In May 2015, **MUNIR ABDULKADER** began discussing with the CHS the possibility of executing a violent attack within the United States. **MUNIR ABDULKADER** discussed an idea of attacking a police station, which according to **MUNIR ABDULKADER** had been declared a permissible target by an ISIL cleric.

18. Based on information from the CHS, your affiant is aware that **MUNIR ABDULKADER** then communicated with the CHS and overseas member(s) of ISIL about a plan to attack a military base and/or kill an identified military employee on account of his position with the United States government. After killing the employee, **MUNIR ABDULKADER** planned to execute a violent attack on a police station in the Southern District of Ohio using firearms and Molotov cocktails.

19. In preparation for the attacks, **MUNIR ABDULKADER** and the CHS took the following actions:


- a. **MUNIR ABDULKADER** asked the CHS to purchase a vest for holding ammunition.
- b. On or about May 18, 2015, **MUNIR ABDULKADER** and the CHS traveled to a police station in the Southern District of Ohio and conducted surveillance of the police station.

- c. On or about May 20, 2015, **MUNIR ABDULKADER** and the CHS went to a shooting range, learned how to operate certain firearms, and practiced shooting of firearms. **MUNIR ABDULKADER** also negotiated the purchase of a firearm, namely an AK-47 assault rifle, for \$350.
- d. On May 21, 2015, **MUNIR ABDULKADER** provided funds for the purchase of an AK-47 assault rifle and took possession of the firearm.

20. **MUNIR ABDULKADER** was arrested by law enforcement on May 21, 2015, after his purchase of the firearm.

Based on the foregoing, I believe there is probable cause to believe that **MUNIR ABDULKADER** violated Title 18, United States Code, Section 2339B (Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization); Title 18, United States Code, Sections 1114 and 1117 (Conspiracy to Kill a Government Employee); and Title 18, United States Code, Section 924(c) (Possession of Firearm in Furtherance of a Crime of Violence); on or about May 21, 2015, in Cincinnati, Ohio, in the Southern District of Ohio.

Respectfully submitted,


T.A. Staderman, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on May 22, 2015


UNITED STATES MAGISTRATE JUDGE