AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Shawn Scott Hare, 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 (the "FBI"), having entered on duty on November 1, 2014, 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.

2. I have investigated national security cases involving individuals seeking to travel overseas to commit violent jihad, 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.

3. The facts in this affidavit come from 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 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.

4. Based on my training and experience as a Special Agent with the FBI, as well as the facts as set forth in this affidavit, there is probable cause to believe that between on or about March 1, 2015, and on or about May 31, 2015, Erick Jamal Hendricks conspired to provide material support to a foreign terrorist organization, the Islamic State of Iraq and the Levant ("ISIL") in violation of Title 18, United States Code, Section 2339B(a)(1). Specifically, Hendricks conspired to provide material support or resources, as that term is defined in 18 U.S.C. § 2339(a), including personnel and services, to ISIL and has performed overt acts in the Northern District of Ohio in furtherance of the conspiracy, including recruiting who were then located in the Northern District of Ohio.

5. This Court is advised that there are items within the Probable Cause section of this Affidavit that have been translated from Arabic into English. In each instance, the preliminary translations were completed by a qualified FBI Linguist for the purpose of accurately representing the statements made by Hendricks. Moreover, for ease of review, the translated material will be limited to that which is enclosed within brackets at the end of each numbered paragraph. 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)

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

Designation of ISIL as a Foreign Terrorist Organization

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

8. On or about May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq ("AQI") as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary 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. On September 21, 2015, the Secretary added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS. Although the group has never called itself "Al-Qaeda in Iraq," this name has frequently been used to describe it through its history. To date, ISIL remains a designated FTO. In an audio recording publicly released on or about June 29, 2014, ISIL announced a formal change of ISIL's name to Islamic State ("IS").

9. Beginning in 2014, using social media, ISIL has called for attacks against citizens – civilian and military – of countries participating in the United States led coalition against ISIL. For instance, on September 21, 2014, ISIL released a speech of Abu Muhammad Al-Adnani, a senior leader and official spokesman of ISIL. In this speech, entitled, "Indeed Your Lord is Ever Watchful," Al-Adnani calls on Muslims who support ISIL 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, ISIL has been encouraging individuals to kill specific persons within the United States.

Arrest and Initial Interview of CW-1

10. In or around June 2015, an identified individual, hereinafter referred to as "CW-1" was arrested in by the Federal Bureau of Investigation (hereafter referred to as the "FBI") in the Northern District of Ohio on charges relating to attempting to provide material support to a designated terrorist organization, being a felon in possession of a firearm, and marijuana distribution.[1] The charges against CW-1 related to CW-1's attempt to support ISIL by producing propaganda videos to support ISIL efforts to recruit new members. CW-1 was arrested while completing the purchase of an AK-47 assault rifle and ammunition from an undercover law enforcement officer. CW-1 also pledged his allegiance to ISIL in social media, frequently made comments indicating his support for ISIL in social media, and made statements expressing an interest in conducting attacks in the United States.

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[1] CW-1 eventually pled guilty to Attempting to Provide Material Support to a Designated Terrorist Organization and two counts of being a Felon in Possession of a Firearm.

11. Agents learned through the investigation of CW-1 that Hendricks had contacted CW-1 to recruit him in the spring of 2015. CW-1 is a resident of the Northern District of Ohio, and was physically located in the Northern District of Ohio during the time that Hendricks recruited CW-1.

12. Immediately after his arrest, FBI agents interviewed CW-1.[2] During that interview, CW-1 was asked about other ISIL supporters with whom CW-1 had communicated that expressed any interest in committing attacks. Specifically, CW-1 was asked about the May 3, 2015 terrorist attack in Garland, Texas:

> FBI: Yeah, how about, uh, the stuff that happened in Garland? Anybody talking about that?
>
> CW-1: Oh, yeah, I'm sorry, yes, ok. Garland, Texas. Fuck. I didn't know about Garland before it happened but a brother had contacted me. The one brother from [Social Media Application #4]. I think I met him. I don't. His name on [Social Media Application #4] was Abu Harb. I had only talked to him twice.

When asked again for the individual's name, CW-1 repeated, "Abu Harb."

13. CW-1 provided more details during this initial interview about his communications with "Abu Harb," including that "Abu Harb" said he was in Dallas and that the "Islamic State had brothers in Mexico." CW-1 also explained, "He [Abu Harb] said you know, we need people, you know, we need to meet, try, you know what I mean? Well, he said he need brothers upon the same thought pattern, right?" CW-1 also said that he had told "Abu Harb"

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[2]CW-1 has an extensive criminal history in addition to the federal convictions, including at least four felony convictions for drug trafficking or abuse and at least three felony convictions for illegal weapons possession.

where he was located: "I think I said, uh first, I think I said Indiana one time or Ohio one time or some other stuff. You know what I mean? Sometimes I say Cleveland but..." Regarding the Garland attack again, CW-1 explained, "He didn't say anything about Garland, Texas though he said he was in Texas. He said we have people in Mexico." CW-1 said that "Abu Harb" told him he would contact him again in two to three months, and that they would have to meet face to face. "Abu Harb" also admonished CW-1 for selling marijuana.

14. CW-1 further explained why "Abu Harb" had contacted him: "Uh, he said, I believe that he said he found me from when I was on [Social Media Application #1]. When I was on [Social Media Application #1] and he private messaged me and he said, hey akhi [brother] I been looking for you cuz I see. I would go on [Social Media Application #1] and say crazy stuff. Americans fight jihad and Muslims and all this other stuff, right? And I was trying to kind of put a flag up."

15. After the arrest and initial interview of CW-1, agents obtained a search warrant in the Northern District of Ohio for the contents of CW-1's Social Media Application #1 account. The results showed that CW-1's Social Media Application #1 account had been contacted on or about March 25, 2015, by account "@sham_reason."

16. At the onset of their communications, "@sham_reason" directed CW-1 to choose an account name within Social Media Application #4 that would not attract the attention of law enforcement, stating "Make up a new username (nothing islamic)..." In response, CW-1 provided "@sham_reason" with a newly created Social Media Application #4 account name that referred to CW-1's former legal name and did not contain any Islamic references, as CW-1 had been instructed. User "@sham_reason" walked CW-1 through the process of signing into Social

Media Application #4 and finding "@sham_reason's" account on Social Media Application #4. The communication between CW-1 and "@sham_reason" on Social Media Application #1 then stopped for a period of approximately two hours and eleven minutes, before resuming.

17. When the conversation between CW-1 and "@sham_reason" resumed on Social Media Application #1, it was apparent that they had been communicating in private on Social Medial Application #4, as directed by "@sham_reason." In the renewed conversation on Social Media Application #1, "@sham_reason" wrote, "As I stated, I'm glad that we spoke privately for the interview for my article. . . Journalists and bloggers are under scrutiny too. . . Even though we don't break any laws. . . Thank you again." In response, CW-1 provided "@sham_reason" with a greeting and then stated, ". . . no thank you for the opportunity."

18. During a later interview with law enforcement described in detail below, CW-1 stated to FBI agents that CW-1 and Hendricks used this exchange about an interview for an article as a ruse in an attempt to avoid detection from law enforcement. According to CW-1, there was no interview for an article. CW-1 identified this exchange on Social Media Application #1 as the exchange in which he met "Abu Harb," as he had described in his initial interview. According to CW-1, "Abu Harb" was the same person who used the "@sham_reason" in this exchange on Social Media Application #1.

Additional Interviews of CW-1

19. After the initial interview of CW-1, and the review of the material obtained by the search warrant on CW-1's Social Media Application #1 account, CW-1 was interviewed multiple

times in the presence of his counsel.[3] During these interviews, CW-1 provided further information about his communications with Hendricks.

20. According to CW-1, within Social Media Applications #3 and/or #4, Hendricks identified himself as "Abu Harb," "Abu Harb Now," or a close variation thereof. Hendricks claimed that he was located in Texas and was a "recruiter." Based upon online content posted by CW-1, online content posted by Hendricks, and the emergence of ISIL during this time period, CW-1 believed that Hendricks was a recruiter for ISIL based in the United States.

21. Hendricks informed CW-1 that he "needed people" and that he wanted to meet CW-1 in person. CW-1 provided Hendricks with CW-1's location, after which Hendricks stated that he was able to travel and would meet with CW-1 in a couple months. Hendricks also stated that there were several "brothers" located in Texas and Mexico, that he was attempting to "get brothers to meet face to face," and that he wanted "to get brothers to train together." Thereafter, Hendricks inquired if CW-1 was willing to travel to Texas, to which CW-1 responded that CW-1 was not able to travel at that particular time.

22. Hendricks asked if CW-1 owned, or had access to, weapons and had any military training. CW-1 informed Hendricks that CW-1 did not have any military training, but did own a pistol. In response, Hendricks responded that "everyone has to get together," "we need more than you," and inquired if CW-1 had any "brothers" located near him. Based on their

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[3] At the time of the interviews, CW-1 had not entered into a plea agreement with the government; however, these interviews were conducted as part of the negotiations over the resolution of the charges against CW-1. CW-1 eventually entered into a plea agreement with the government that contained a cooperation agreement in which the government agreed to move for a reduced sentence for CW-1 at sentencing.

communications up until that point, CW-1 understood these statements by Hendricks to mean that he was recruiting individuals to train together for the purpose of conducting a terrorist attack in the United States.

23. CW-1 stated that Hendricks tested his religious knowledge and commitment to jihad. Hendricks also inquired about CW-1's willingness to commit "jihad," to die as a "martyr," and CW-1's desire to enter "jannah." [The term "jannah" translates to "paradise."] Again, based upon the context of their conversations, CW-1 believed Hendricks asked these questions to determine if CW-1 was suitable for recruitment to participate in a terrorist attack in the United States.

24. CW-1 stated that he was directed by Hendricks to provide information pertaining to other "brothers" for recruitment. In response to Hendricks' direction, CW-1 provided Hendricks with the social media profile information for an individual CW-1 was communicating with online. Unbeknownst to CW-1, that individual was a confidential informant, hereafter "CHS-2,[4]" whom CW-1 believed to be an online ISIL sympathizer located in Maryland. CW-1 noted that Hendricks instructed CW-1 not to provide Hendricks' contact information to CHS-2 or anyone else.

25. CW-1 stated to the FBI that CW-1 believed that Hendricks and the "brothers located in Texas and Mexico" Hendricks told CW-1 about may have been responsible for the Garland, Texas attack on or about May 3, 2015. As a result, because CW-1 had communicated

[4]CHS-2 is a paid confidential informant, having worked with the FBI for four (4) years. All information provided by CHS-2 to date has been deemed to be truthful and accurate, with no known reliability issues. CHS-2 has no known criminal history. This notwithstanding, the information contained within this Affidavit from the activities of CHS-2 has been corroborated by the FBI.

with Hendricks about "jihad" and then provided Hendricks with information about CHS-2 (as a potential recruit), CW-1 decided to stay away from social media for a period following the attack to minimize detection from law enforcement.

Corroboration of CW-1's Communications with Hendricks

26. There is corroboration for CW-1's communications with Hendricks. As described above, the records obtained pursuant to the search warrant on CW-1's Social Media Application #1 account showed the initial communications in which Hendricks made contact with CW-1 and directed him to communicate using another social media application. These records then show a gap in time in which it appears that CW-1 and Hendricks were communicating on the more secure social media application.

27. Communications between CW-1 and CHS-2 also corroborated the communications with Hendricks. On or about April 6, 2015, CW-1 contacted CHS-2 within Social Media Application #3 and stated that CW-1 had been communicating with an ISIL member in Texas. CW-1 told CHS-2, "Now I.s. is here." CW-1 further explained, "In Texas I believe." CW-1 informed CHS-2 that this individual directed CW-1 to "put bros in contact with him." CW-1 also confirmed that this "brother" initially contacted him on Social Media Application #1, asked CW-1 to travel, emphasized the importance of meeting in person, and reminded CW-1 that "the punishment for telling on a muslim is death." CW-1 also said that after learning that CW-1 sold marijuana, this individual advised that a "Mujahid doesn't do this." CW-1 told CHS-2 that CW-1 was going to do what the individual told him to do.

28. During this conversation CW-1 also explained that there should be no talking on less secure social media applications such as Social Media Application #1. Prior to this communication, CW-1 and CHS-2 exclusively used other social media applications to include Social Media Application #1. From this date forward after this communication, CW-1 and CHS-2 rarely used any social media applications other than Social Media Application #3. These communications with CHS-2 were consistent with CW-1's descriptions of his communications with Hendricks, specifically that Hendricks had requested the contact information for others who could bé recruited; that CW-1 provided CHS-2's contact information to Hendricks in response; that Hendricks had asked CW-1 to travel and to meet him; that Hendricks had directed the use of more secure social media applications to communicate; and that Hendricks had admonished CW-1 for selling marijuana.

29. CW-1's social media communications also corroborate the statement that CW-1 was worried about law enforcement and decided to stay away from social media following the Garland, Texas attack because of concerns about communicating with someone (Hendricks) who CW-1 thought was involved in that attack. On or about May 9, 2015, CW-1 sent CHS-2 a message through Social Media Application #3. In his message, CW-1 stated, "I'll be offline for a couple months ahk." [The term "ahk" is a shortened version of "ahki," which translates to "brother."]

30. Communications between Hendricks and an undercover FBI employee ("UCE-1") also corroborate CW-1's description of his communications with Hendricks. As described below, the questions asked and directions given by Hendricks when communicating with CW-1 were similar to those described in Hendricks' communications with UCE-1. Further, during his

communications with UCE-1 on or about April 25, 2015, Hendricks referred to an "Ohio brother" he had been speaking to who had a "weed problem he was trying to kick." Based on CW-1's location in Ohio and statement that Hendricks had admonished CW-1 for selling marijuana, your Affiant believes that Hendricks was referring to CW-1 in this communication.

Communications between Hendricks and Others

31. After analyzing the above referenced information provided by CW-1, FBI agents confirmed that CW-1 had been in communications with Hendricks during approximately the same time period that Hendricks was in communication with an undercover FBI employee (UCE-1) and several confidential human sources (CHS-1, CHS-3, and CHS-4), as described below. The UCE-1 and these CHSs had also been communicating with Hendricks regarding the recruitment of members for a cell to support ISIL in the United States. During the majority of the communications between UCE-1 and Hendricks, UCE-1 was physically located within the Northern District of Ohio. During these communications, Hendricks frequently changed the user names of the accounts he used to communicate as a security precaution. However, based on the continuity of the conversations, the context of the communications in relationship to other known communications of Hendricks, similarities in the usernames, and the use of a code developed between Hendricks and UCE-1 to identify each other, all of the communications below were determined to be from Hendricks.

32. On or about March 19, 2015, Hendricks and an identified individual, hereinafter "Individual 1," met with CHS-1[5] and another identified individual, hereinafter "Individual 2," in Baltimore, Maryland.[6] During this meeting, Hendricks, known as "Mustafa" to CHS-1, directed the attendees to remove their cell phone batteries. According to CHS-1, Hendricks claimed to have land in Arkansas where he planned to "get off the grid" and prepare for an eventual violent confrontation with law enforcement. CHS-1 stated Hendricks and his wife directed CHS-1 to recruit like-minded individuals for the group. During this meeting, Hendricks also requested that CHS-1 introduce him (Hendricks) online to the user of a Social Media Application #1 profile, known to the FBI to be a member of ISIL located overseas.[7] Based upon these interactions, CHS-1 believed Hendricks was recruiting CHS-1 and others to organize on behalf of ISIL.

33. On or about March 24, 2015, UCE-1 initiated contact with Hendricks' Social Media Application #3 account "shamreason" after observing that Hendricks' Social Media Application #1 account "@sham_reason"[8] was in contact with another identified ISIL supporter. During their initial communication, as with CW-1, Hendricks tested UCE-1's religious knowledge and requested UCE-1's Social Media Application #1 account, so he could evaluate

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[5] CHS-1 is a paid confidential informant, having worked for the FBI for one and a half years. All information provided by CHS-1 to date has been deemed to be truthful and accurate, with no known reliability issues. CHS-1 does have a criminal history resulting from fraud/forgery related offenses. CHS-1 has not received any sentencing benefits from the FBI resulting from his/her criminal activity. The information contained within this Affidavit from the activities of CHS-1 was corroborated by the FBI.

[6] This meeting was not audio or video recorded.

[7] The Social Media Application #1 account of this individual is known by the FBI to have been referenced by Elton Simpson, one of the attackers killed while conducting the Garland, Texas attack on May 3, 2015.

[8] This is the same Social Media Application #1 account, used by Hendricks, that contacted CW-1 on March 25, 2015.

UCE-1's credibility. Hendricks explained that his questioning of UCE-1 and review of his/her profile were security precautions. According to Hendricks, if he (Hendricks) determined that UCE-1 satisfied his (Hendricks') security concerns, UCE-1 would be permitted to move to the "next level."

34. On or about April 8, 2015, UCE-1 was contacted by Social Media Application #3 account "lovethehaqq." Based on UCE-1's communications with Hendricks when he used Social Media Application #3 account "shamreason" on or about March 24, 2015, UCE-1 determined that "lovethehaqq" and "shamreason" were used by the same person—Hendricks. Hendricks and UCE-1 conducted a brief conversation, during which UCE-1 disclosed that he/she had been a Muslim for "almost 2 years." Hendricks then contacted UCE-1 using Social Media Application #3 account "cantdeny." Hendricks directed UCE-1 to transfer their communications to Social Media Application #2 due to privacy concerns, stating "There is an app called [Social Media Application #2] that if you get the chance to research it. . . But you must get [Social Media Application #2]. . . Give me your [Social Media Application #2 user name]." Despite this direction, Hendricks continued their communication within Social Media Application #3, emphasizing to UCE-1 the need for security[9] and the need for UCE-1 to recruit additional men and women. Hendricks explained that he and others have "land," they are "building" for the

[9] Hendricks repeatedly discussed the importance of living "off the grid." Hendricks defined "off the grid" meaning "your location and who you are unknown." He further defined "on the grid" as providing personal information such as "your legal name, legal address, bills, etc." Hendricks cautioned UCE-1 that if he/she provided his/her personal information and/or used "remote" devices, then "there is a high possible you're being monitored." Hendricks closed by stating, "True anonymity is being off the grid."

sake of the group and that he wanted to put UCE-1 in contact with a "brother" for UCE-1 to evaluate for potential recruitment.

35. Also on April 8, 2015, Hendricks provided UCE-1 with ideas to detect the presence of governmental surveillance. Hendricks offered several suggestions: give "misinformation to elude something that is about to go down and/or something valuable or someone will meet you at a place. . . Survalence the area or spot to see if it's tampered or tracked;" "Rent a storage. Plant cameras inside pretend there is some kind of sensitive thing in there. . . Survalence the camera to see if it's tampered or you caught someone in there. . . If so, then you're being watched and your is blown etc;" and "pretend to meet people and see who else shows. . . This is cheaper lol. . . Counter survalence ."

36. During this conversation on April 8, 2015, Hendricks made several statements to UCE-1 that indicated he was in possession of firearms. Hendricks stated, "I keep my chopper ready by my door." He stated, "I sleep with my ak, wake with it and rub it once I return to it." "Chopper" and "AK" are terms commonly used to refer to an AK-47 style rifle. In response, UCE-1 stated that there were better weapons available, to which Hendricks acknowledged, "Yeah I know. The bullets are easy to buy." Hendricks also indicated that he avoids air travel because he cannot bring his weapons onboard: "I never fly. . . Never. . . Can't bring my babies and I'm never without them. . . If you know what I mean." As such, your Affiant believes that Hendricks may in fact be in possession of an AK-47 and/or other weapons, for which he may also have ammunition.

37. Lastly, during this same conversation (on April 8, 2015), Hendricks directed UCE-1 to contact a "brother" using Social Media Application #2. Hendricks then provided UCE-1 the following instructions for dealing with potential recruits:

> Observe these rules brother..
> -No personal details
> -Don't agree to meet unless through me
> -don't tell your state unless through me
> -I assume all the risk
> -run NO DETAILS ABOUT IDENTITY OR ORGANIZATION EXCEPT THROUGH ME. Ok my dear brother?

38. During approximately the same period that Hendricks was beginning to communicate with CW-1 and UCE-1, he engaged in similar communications with CHS-3.[10] Beginning on or about April 1, 2015, Hendricks, using Social Media Application #3 account "wilayahtx," communicated with CHS-3 via Social Media Application #3. During their initial communications, Hendricks disclosed that his Social Media Application #1 account was "@sham_reason," and stated that CHS-3 could refer to him as "Abu harb." Over the course of several communications, Hendricks cautioned CHS-3 on the use of Social Media Application #3 due to privacy concerns and the popularity of the application. Hendricks directed CHS-3 to use Anonymizing Software Application #1[11] when accessing the internet and Social Media Application #2 when communicating with other like-minded individuals.

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[10] CHS-3 is a paid confidential informant, having worked with the FBI for four and a half years. All information provided by CHS-3 to date has been deemed to be truthful and accurate, with no known reliability issues. CHS-3 has no known criminal history. This notwithstanding, the information contained within this Affidavit from the activities of CHS-3 was corroborated by the FBI.

[11] Anonymizing Software Application #1 provided a network or anonymous internet connection that allowed users to conceal their identity and location (*e.g.*, Internet Protocol (IP) Address).

39. Hendricks also informed CHS-3 that he recently conducted a meeting with others. Additionally, as with UCE-1 and CW-1, Hendricks asked CHS-3 several questions designed to test his/her religious knowledge. Hendricks referred to these questions with CHS-3 as "standard verification questions." The questions focused on whether or not CHS-3 was a member of law enforcement and general questions regarding Islam.

40. Hendricks and CHS-3 then continued their communications within Social Media Application #2. During these communications, Hendricks instructed CHS-3 to ensure CHS-3's account name was not similar to the Social Media Application #3 account, devoid of any "Islamic"[12] references, and also instructed CHS-3 not to use any "Islamic" terms without "splitting them." Specifically, Hendricks stated, "Make anotherone and don't user your [Social Application #3] name or anything Islamic," "Unplugyourself from the grid. That makes your moves predictable," and "Brother don't use isla micterms with splitting them." Hendricks also directed CHS-3 to read an online manual which he described as "the moo ja hid guide 2015."[13]

41. On or about April 8, 2015, Hendricks contacted CHS-3 using Social Media Application #2 account "hereafter." During their April 8, 2015 communication, Hendricks

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[12] Hendricks' direction to CHS-3 was identical to that given to CW-1, when on or about March 25, 2015, Hendricks instructed CW-1 to "Make up a new username (nothing islamic)...," prior to commencing communications within Social Media Application #4.

[13] Your Affiant believes that Hendricks was referring to a publication that was disseminated online entitled, "How to Survive in the West: A Mujahid Guide (2015)." This publication was a 71-page, unofficial ISIL supporter-created, manual that provided guidance for "Muslims who are living in a majority non-Muslim land" that aimed to "teach you how to be a secret Agent who lives a double life, something Muslims will have to do to survive in the coming years." Topics in the manual included: "Hiding the Extremist Identity," "Internet Privacy," "Bomb Making," and "Transporting Weapons," as well as survival techniques and how to evade arrest.

directed CHS-3 to contact UCE-1's Social Media Application #2 account. Hendricks directed CHS-3 to evaluate UCE-1 for potential recruitment, stating, "Stand by for his user name. I also want you to vet him with the same rules you learned from me. I think he is trustworthy enough to introduce him to you." Hendricks then provided CHS-3 with specific guidance when contacting others. Hendricks wrote:

> -No personal details
> -Don't agree to meet unless through me
> -don't tell your state unless through me
> -I assume all the risk
> -run NO DETAILS ABOUT IDENTITY OR ORGANIZATION EXCEPT THROUGH
> ME. Ok my dear brother?

This is the same guidance Hendricks gave to UCE-1 that same day regarding communicating with the brother with whom Hendricks was putting him in contact.

42. On or about April 12, 2015, Hendricks told UCE-1 that he needed him to communicate with others, "There is a few brothers that I want to bring to your attention." When asked by UCE-1 if he was thinking long term, Hendricks responded, "Yes long term. This is what has been advised. UCE-1 questioned Hendricks about his purpose. Hendricks explained:

> each body has a brain in order to operate the limbs. In order for the body to be functional we need a strong brain. We are constructing the brain. In this land my dear brother a brain is needed then the limbs grow. But all the ummah is one body so in a way it doesn't fit bc ultimately the brain is the kh la fa.[14] Every business needs a headquarters and outposts.

UCE-1 then asked Hendricks if they (Hendricks and UCE-1) were making their own brain or if they were connected to the ultimate brain. Hendricks responded, "Ulti m ate brain brother lol."

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[14] "kh la fa" was an abbreviation (for Khilafah or the Caliphate) that UCE-1 and Hendricks used to refer to ISIL.

Based on Hendricks' frequent use of spaces between letters in words that he thought would draw law enforcement attention, a practice he advised UCE-1 and others to adopt, your Affiant believes that "kh la fa," is a coded reference to "khilafa," the Arabic word for caliphate, and further a reference to ISIL. Followers of ISIL believe that ISIL has established an Islamic caliphate and commonly refer to ISIL as the "caliphate" or "khilafa." Thus, Hendricks' reference to the ultimate brain is a reference to ISIL.

43. UCE-1 later questioned Hendricks about individuals being evaluated online for recruitment into the group that were promoting ISIL or wanting to travel overseas to fight on behalf of ISIL, commonly referred to as "hijrah." In response, Hendricks wrote:

> Jail is not an option for us. It's nothing but humiliation and it pleases the enemies. As for the last concern Hijrah is a great deed. If that's what your heart desires then I ask Allah to make you intentions noble. I've spoke to senior brothers and the Naseehah [advice] is to remain here. Study the battle of the trench when the man came to the prophet and became muslim. He said with us you are one man but go and shake them from within.

44. During the communications with Hendricks on or about April 12, 2015, Hendricks also provided UCE-1 with a user name for a Social Media Application #1 account and warned UCE-1 that the user was "the feds," and that UCE-1 should not follow the account. Hendricks also directed UCE-1 to "[j]ust monitor it to not allow brothers to get entr app ed." Hendricks then directed UCE-1 to another online account. After telling UCE-1 that he could not "determine his position," Hendricks directed UCE-1 to "[s]ee if you can."

45. On or about April 16, 2015, while using Social Media Application #2 account "hereafter," Hendricks instructed UCE-1 to download a document entitled, "GPS for the Ghuraba in the U.S." This document was a 19-page instruction manual focused on

counteracting law enforcement surveillance, providing technological advice, and communicating protocols for those planning to conduct attacks in the United States. The document also provided ways to support the mujahideen, to include topics such as "Fight with your hands," "Fight with your wealth," "Fight with your tongue," "Using your cell phone," and "Using your computer." The document included a section entitled "Final Advice," which advocated that "brothers and sisters" should not allow themselves to be imprisoned. This section further encouraged Muslims to "stop going to jail. . . willingly," to die as a "Shaheed (martyr)," to "Boobie trap your homes," to "lay in wait for them," and to "never leave your home without your AK-47 or M16." Lastly, this section encouraged Muslims who were "in deep," to "martyr" themselves during routine traffic stops conducted by law enforcement. The document was signed "Abu Ibrahim Al Ameriki." Hendricks directed UCE-1 to first download, and then disseminate the document to a Social Media Application #2 account that belonged to CHS-3.

46. Also, on or about April 16, 2015, Hendricks told UCE-1 that they needed "$$." However, Hendricks further explained that they have a "solid budget for now." On or about April 18, 2015, Hendricks told UCE-1 he wished UCE-1 could "assist on a $ level."

47. On or about April 18, 2015, Hendricks, while using Social Media Application #2 account "hidingmyrights," also provided CHS-4[15] with a link to the document "GPS for the

[15] CHS-4 is a paid confidential informant, having worked with the FBI for four years. All information provided by CHS-4 to date has been deemed to be truthful and accurate, with no known reliability issues. CHS-4 has no known criminal history. This notwithstanding, the information contained within this Affidavit from the activities of CHS-4 has been corroborated by the FBI.

Ghuraba in the U.S." The document provided to CHS-4 was identical to the document provided to UCE-1 on or about April 16, 2015.

48. On or about April 19, 2015, UCE-1 and Hendricks again discussed whether one should make "hijrah," or stay in the United States. After UCE-1 made a comment about leaving the United States and that "hijrah" was dead, Hendricks responded, "Hij rah is not what senior people requested me." UCE-1 further added, "Does the head give orders?" Hendricks responded, "No. The conditions for a wili ya h have to be in place. Only advice," and "The only provide advice to wol ves. And connect ppl [people] to form gro ups."

49. On or about April 21, 2015, Hendricks and UCE-1 again communicated regarding the recruitment of individuals online. Hendricks directed UCE-1 to communicate with an online account of an individual in Canada. While UCE-1 communicated with the person in Canada, Hendricks provided questions to ask. Hendricks explained to UCE-1, "It's hard to sift through brothers;" "Allah chooses only the few;" and "Everyday I do this day in and day out." Hendricks and UCE-1 also developed a code to verify their identities for future conversations.

50. On or about April 23, 2015, Hendricks, while using Social Media Application #2 account "accepted," contacted CHS-4 and wrote that "accepted" was the former user of Social Media Application #2 account "nowhaq." Specifically, Hendricks stated, "This is your brother. . . I changed my id. . . Nowhaq was my last one."

51. On or about April 24, 2015, Hendricks, while using Social Media Application #2 account "accepted," asked CHS-4 about his/her profession, if CHS-4 had a criminal record or disabilities, and if CHS-4 could travel. Specifically, Hendricks asked, "When can u travel akh," "Brother what u do for work," "U know about hacking etc," "Hv the fed s ever visit or call u akh.

Or hv u ever been locked up," "Do you hv any disabilities," and "Hv u been securing your communication akh." Additionally, Hendricks stated that he had "a few brothers" that he wanted to put in contact with CHS-4.

52. On or about May 1, 2015, Hendricks, while using Social Media Application #2 account "accepted," exchanged messages with CHS-4 and discussed the two meeting in person on or about May 2, 2015. On or about May 2, 2015, Hendricks and CHS-4 met in-person in the vicinity of Baltimore, Maryland.[16] At the meeting, Hendricks identified himself as the individual with whom CHS-4 was communicating via Social Media Application #2 account "accepted." Also present during the meeting was Individual 1, who is the former spouse of Hendricks, having been divorced from him in 2009.

53. During the in-person meeting, Hendricks introduced himself as "Mustafa." Hendricks provided CHS-4 with instructions on counter-surveillance measures and claimed that he knew of these methods because he was the head of security for a company near the U.S. Capitol.[17] Hendricks admitted to CHS-4 that he and his wife wrote a document entitled "GPS for the Ghuraba in the U.S." Hendricks stated that his goal was to create a sleeper cell to be trained and housed at a secure compound. According to Hendricks, his sleeper cells would be used to conduct attacks in the United States. Hendricks mentioned that future targets would include military members whose information had been released by ISIL and the woman who organized the "Draw Prophet Mohammad contest." Hendricks told CHS-4 that he was currently

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[16] This meeting was corroborated through physical surveillance and use of an audio recording device. However, portions of the audio recording are inaudible.

[17] The FBI has no information corroborating that this claim is true.

communicating with an Imam in Arizona who Hendricks wanted to bring into the group as their spiritual guide. Hendricks also claimed to know a member of ISIL overseas. Hendricks also stated that he had been in contact with senior brothers.

54. Hendricks next claimed to have 10 members signed up in his group, to include a combination of males and females. Hendricks expressed a desire to conduct night missions to obtain weapons from military depots and recruiting stations. Hendricks stated that he wanted to build a secure compound for training of the group and estimated that he needed $30,000 USD for the compound. Hendricks also indicated the next step in his plan was to have four to five males make a jihad video in the next few months. Hendricks stated that the video would be 10-15 minutes in length, would display the ISIL flag, and depict individuals carrying weapons and wearing masks with their voices disguised. The purpose of the video would be for recruitment into his terrorist cell.

55. During the meeting between CHS-4 and Hendricks, FBI surveillance observed a Honda Odyssey van with South Carolina license plates. According to the South Carolina Department of Motor Vehicles, the vehicle was registered to Individual 1, Hendricks' former spouse. Immediately following the meeting, FBI agents showed CHS-4 a photograph of Hendricks. CHS-4 positively identified Hendricks as the individual that he/she met with moments earlier.

56. On the same date, Hendricks, while using Social Media Application #2 account "accepted," admitted to UCE-1 that he met with "our mutual brother from PA and he is the real deal." Hendricks also told UCE-1 that he was in Baltimore. Your Affiant believes that the above mentioned "brother from PA" is CHS-4, based upon the timing of Hendricks'

communication to UCE-1 and meeting with CHS-4 (who previously informed Hendricks that CHS-4 was from Pennsylvania.)

Hendricks' Connections to a Perpetrator of the thwarted terrorist attack in Garland, Texas on May 3, 2015

57. On or about May 3, 2015, Elton Simpson (hereinafter referred to as "Simpson") and Nadir Hamid Soofi (hereinafter referred to as "Soofi"), who were inspired by ISIL, arrived together at the Curtis Culwell Center in Garland, Texas for the purpose of conducting a terrorist attack. The center was hosting an event entitled "The First Annual Muhammad Art Exhibit and Contest." Also present at the exhibit was the organizer of the event, who was scheduled to deliver a speech to those in attendance.

58. Simpson and Soofi arrived together in a vehicle, equipped with body armor and assault style weapons. Simpson and Soofi drove their vehicle up to the center, exited, and began shooting towards the entrance. A nearby security guard suffered minor injuries before the Garland police returned fire and killed both Simpson and Soofi.

59. In the moments prior to the attack, Simpson posted a Social Media Application #1 message which read, "#texasattack: 'May Allah accept us as mujahideen.'" In his message, Simpson also stated that he and Soofi had pledged their allegiance to "Amirul Mu'mineen," which is an alias for ISIL leader Abu Bakr al-Baghdadi.

60. In the days following the attack, members of ISIL claimed responsibility for the attempted attack. During a radio address, one ISIL member referred to Simpson and Soofi as "brothers," and provided the following warning: "We say to the defenders of the cross, the U.S.,

that future attacks are going to be harsher and worse. The Islamic State soldiers will inflict harm on you with the grace of God. The future is just around the corner."

61. On or about April 23, 2015, Social Media Application #1 account "@tawaakul" posted a link to the "Draw the Prophet Muhammad Contest." The user of "@tawaakul" was later identified as Simpson. On this same date, Hendricks contacted Simpson via Social Media Application #1 and requested Simpson's Social Media Application #3 account. During this exchange, Hendricks identified himself as being a Montana resident.[18]

62. The FBI has confirmed that Simpson was in contact with Hendricks via Social Media Application #3 prior to the events in Garland, Texas. After the attack, on or about May 4, 2015, a federal search and seizure warrant was executed at the Phoenix, Arizona residence of Simpson and Soofi. During the search, a cell phone was collected and subsequently examined pursuant to the search warrant. The telephone number for the phone was linked to Simpson. A review of the photographic images found in the phone revealed digital pictures taken of communications using Social Media Application #3 on another cellular telephone. These messages were between Social Media Application #3 account "Juba8021," attributed to Simpson, and including Social Media Application #3 account "UmmahOne," believed by the FBI to have been used by Hendricks.[19]

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[18] UCE-1 stated that Hendricks has made claims in the past that he was located in Montana.

[19] The account name "UmmahOne" is substantially similar to those previously known to be used by Hendricks. Moreover, a review of communications between this account and Simpson again revealed substantial similarities between content discussed, to include "UmmahOne's" statement that he resided in Montana and Simpson's provision of his Social Media Application #3 account "Juba8021."

63. Also on or about April 23, 2015, Hendricks, using Social Media Application #2 account "accepted," directed UCE-1 to contact "a good brother" because he wanted them to be introduced to each other. Hendricks added, "I vouch for this brother. He is good and clean. . . Just validate who I am and what we have been connecting brothers etc." Hendricks gave further instruction to UCE-1, stating, "Don't ask him about details though." Hendricks next provided UCE-1with Social Media Application #3 account "juba1911," for UCE-1 to contact this "brother." While still communicating with Hendricks on Social Media Application #2, UCE-1 sent an invite on Social Media Application #3 to Social Media Application #3 account, "juba1911." Hendricks told UCE-1 that "juba1911" was simultaneously contacting him (Hendricks) via Social Media Application #3 to verify UCE-1's account.[20]

64. During this same communication with UCE-1, Hendricks indicated that he might "be driving out west to meet a few brothers." UCE-1 asked when Hendricks would be traveling throughout the southwest so that they could meet. Hendricks responded that he was "trying to sync with three others after me and you. . . Each separately."

65. Later on that day, UCE-1 contacted Social Media Application #3 account "juba1911" (which was owned and operated by Simpson). During the conversation, "juba1911" claimed to have recently met Hendricks online and to have communicated with him a "few times on [Social Media Application #1] and now on [Social Media Application #3]." "juba1911" disclosed to UCE-1 that he had been a Muslim for "11 yrs," to which UCE-1 responded that

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[20] The FBI conducted a forensic examination of Simpson's cellular phone that was found on scene immediately after the Garland, Texas attack. This examination revealed that he purchased Social Media Application #3 and downloaded it onto his phone on or about March 22, 2015.

he/she had been a Muslim for "2 years." UCE-1 told "juba1911," "We've got a good mutual brother and its worth keeping in touch. . ." "juba1911" asked UCE-1, "Who sent you to me akhi?," to which UCE-1 responded, "A good brother. Talk to him on [Social Media Application #2]. We talk about organizing." UCE-1 added that Hendricks was "really good at putting brothers in touch. . . I'm not sure why he paired us up lol. . . Are u looking for like minded brothers?" "juba1911" responded, "He didn't tell you why?. . . What did he say to you then?" UCE-1 then stated, "I'm sure he had a purpose. . . I don't know anything more than your name." Thereafter, "juba1911" stated, "Well u mentioned something earlier abt organizing ."

66. The next day, on or about April 24, 2015, UCE-1 again contacted Social Media Application #3 account "juba1911." During this communication, "juba1911" and UCE-1 discussed the need to be careful when communicating with others online. "juba1911" made multiple references to the presence of spies online, later asking UCE-1, "Do u know the hukm of the spy?" "juba1911" added, "Having spies can be good from 2 angles. . . 1 can leads to shahadah . . . 2. Keeps u on point security wise." [The term "shahadah" translates to a "profession or testimony of the oneness of Allah," and "hokum" means ruling or judgment.] "juba1911" also briefly discussed their shared experiences when communicating with Hendricks, which focused on the length of time they were each in contact with Hendricks and similarities with Hendricks' assurances when facilitating their introduction (*e.g.*, Hendricks stated to "juba1911" that UCE-1 was "a good brother, pretty much the same things he told u about me, he said about u.").

67. "juba1911" also shared limited details about his criminal history, stating "I've been arrested b4 akh. . . That's all I will say. . . Arrested not for some worldly affair. . . HAd a

spy on me for 4yrs. . ." UCE-1 later asked "juba911" how much time he spent in prison, to which Simpson responded, "Not much, got bailed out. . . 1 charge dropped, 1 stayed, 3yrs probation." "juba1911" also made references to the upcoming "drawing" contest in Garland, Texas, asking UCE-1, "Did u see that link I posted? About texas ? Prob not." In response, UCE-1 stated that he/she did not have "juba1911's" Social Media Application #1 account. Thereafter, "juba1911" posted a link to the "Draw Prophet Muhammad Contest" in Garland, Texas. In an effort to continue their dialogue, UCE-1 made the statement, "Tear up Texas." In response, "juba1911" warned UCE-1, "Bro, u don't have to say that. . . U know what happened in Paris[21]. . . I think. . . Yes or no...?" UCE-1 replied, "Right," after which "juba1911" stated, "So that goes without saying. . . No need to be direct."

68. After discussing details that Hendricks told UCE-1 about himself and that Hendricks was "connected," "juba1911" cautioned UCE-1 that if he/she owned a weapon, he/she should keep it on his/her person at all times in case of a law enforcement sting operation. Specifically, "juba1911" stated, "If u have ur own thing.....keep it on u at all times...Bc u know it's real and functional...Make sense?...If u read about sting ops...From the news...They never give authentic thungs ...Things...:)"

69. Based on "juba1911's" description of his personal and criminal history, along with the cellular telephone later found in Simpson's residence with the images of

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[21] Based upon the timing of this communication, your Affiant believes that Simpson was referring to the terrorist attack that occurred in Paris, France on or about January 7, 2015, when Said and Cherif Kouachi conducted a terrorist attack at the Charlie Hebdo newspaper headquarters.

communications using a variation of "juba" as the user name, your Affiant believes that "juba1911" was Simpson.

70. On or about May 1, 2015, Hendricks, while using Social Media Application #2 account "accepted," communicated with UCE-1 regarding the upcoming drawing the Prophet Mohammad contest in Garland, Texas. UCE-1 reminded Hendricks that "Juba," meaning Simpson, had told UCE-1 about it. After further discussion about the event and "Juba," Hendricks stated in reference to "Juba," "The AZ [Arizona] brother?" UCE-1 replied, "He told me that he tweeted a article about the drawing contest and then u hit him up about it." Hendricks responded, "The one who call me a spy?" At the time, Simpson was residing in Arizona. Hendricks claimed to have just learned about the drawing contest that evening. After UCE-1 commented that UCE-1 could have linked up with "Juba," Hendricks replied, "You can link with him brother. That's your call."

71. The next day, on or about May 2, 2015, Hendricks, while using Social Media Application #2 account "accepted," again communicated with UCE-1 about the contest in Garland, Texas. Hendricks wrote, "I wish someone could go to tx and harass them during the night;" "a good solid protest;" and "Unique one man protest." Hendricks also told UCE-1 why he [Hendricks] could not go to Texas, "Too much driving for us. And I don't fly." At the time, Hendricks was in Baltimore, having just met CHS-4. UCE-1 responded, "Ok. Just me or any other brothers?" Hendricks responded, "See what you and bro Juda[22] can do;" and "At least be heard." UCE-1 asked if Hendricks was still in contact with "juba" [Simpson]. Hendricks told

[22] "Bro Juda" is believed to be "bro Juba," – meaning Simpson.

UCE-1, "He has another brother he knows," and stated that he was not in contact with him. However, Hendricks then provided Social Media Application #1 account "tawwakil" to UCE-1 to use to contact "juba" [Simpson]. Subsequent investigation determined that Social Media Application #1 accounts "@atawaakul" and "@tawaakul" were used by Simpson.

72. UCE-1 subsequently traveled to Garland, Texas and was present on or about May 3, 2015, at the event. UCE-1 notified Hendricks that he/she was in the vicinity of the "Draw the Prophet Muhammad Contest" event in Garland, Texas. Hendricks stated, "If you see that pig [meaning the organizer of the event] make your 'voice' heard against her."[23] Hendricks asked UCE-1 a series of questions related to the security posture, to include: "How is security?;" How big is gathering?;" "How many ppl?;" "How many police/agents?;" "How big is building?;" "Is it wood?;" "Do u see feds there?;" "Do you see snipers?;" and "How many media?"

73. During this conversation, Hendricks also asked UCE-1 several questions, which your Affiant believes were aimed at determining if UCE-1 was armed with weapons. After UCE-1 provided Hendricks with a series of general observations, Hendricks asked, "What u got with u?" UCE-1 responded, "Tools of the trade," and "not a small hand tool." Hendricks responded, "Lol," and "The ppl doing the drawing and hosting and observing are the ones needed to protest against." UCE-1 next explained that there was not a lot of activity outside of the center, to which Hendricks responded, "Yea they are there but you can voice your concerns to the hosts after their detail is gone…They will be outside yapping their mouths and thanking

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[23] Your Affiant believes that Hendricks' use of quotations around the word 'voice' implied that he was directing UCE-1 to commit an act of violence against the organizer of the event.

the pigs." UCE-1 responded, "OK let me let u go n see how close I can get." Lastly, just prior to the attack, Hendricks stated to UCE-1, "You may see her get into a car to go to airport or catch a flight etc," referring to the organizer of the event. Shortly thereafter, Simpson and Soofi committed the attack on the cartoon drawing contest venue described above.

Hendricks' actions after the thwarted terrorist attack in Garland, Texas

74. On or about May 4, 2015, one day after the terrorist attack in Garland, Texas, Hendricks, while using Social Media Application #3 account "itsmehere," contacted CHS-4 and instructed him/her to clean up his/her Social Media Application #1 page and take all "pro sguff off." Hendricks then told CHS-4 to "Keep looking fir me on here akh I may need you to help online soon." Hendricks also stated that he intended to obtain another cellular telephone. Lastly, Hendricks asked if CHS-4 was familiar with the website, justpaste.it.

75. On or about May 5, 2015, Hendricks, while using Social Media Application #3 account "itsmehere," directed CHS-4 to an identified Social Media Application #1 account that contained a link to a document ['New Era' Justpaste.it/Anonymous90]. Pertinent portions of the document stated:

> 'The New Era' To our brothers and sisters fighting for the Sake of Allah, we make dua for you and ask Allah to guide your bullets, terrify your enemies, and establish you in the Land. As our noble brother in the Philippines said in his bayah, 'This is the Golden Era, everyone who believes... is running for Shaheed.' The attack by the Islamic State in AmEricka is only the beginning of our efforts to establish a wiliyah in the heart of our enemy. Our aim was the khanzeer [the organizer of the Garland, TX event]and to show her that we don't care what land she hides in or what sky shields her; we will send all our Lions to achieve her slaughter. This will heal the hearts of our brothers and disperse the ones behind her. To those who protect her: this will be your only warning of housing this woman and her circus show. Everyone who houses her events, gives her a platform to spill her filth are legitimate targets. We have been watching closely who was present at this event and the shooter of our brothers. We knew that the target was protected. Our intention was to show how easy we give our lives for the Sake of Allah. We have 71

> trained soldiers in 15 states ready at our word to attack any target we desire. Out of the 71 trained soldiers 23 have signed up for operations like Sunday. We are increasing in number bithnillah. Of the 15 states, 5 we will name...Virginia, Maryland, Illinois, California, and Michigan. The disbelievers who shot our brothers think that you killed someone untrained, nay, they gave you their bodies in plain view because we were watching. The next six months will be interesting. Look for us on Mondays and Fridays. To our Amir Al Mu'mineen,[24] make dua for us and continue your reign, May Allah enable your face. May Allah send His peace and blessings upon our Prophet Muhummad and all those who follow until the last Day. Abu Ibrahim Al Ameriki.

76. A variation of this document was also located online at the URL of www.justpaste.it/Anonymous13. This document was substantially the same, but provided a description of the background of the attackers that was not included in the other version: "The disbelievers who shot our brothers **from Arizona, a new Muslim of 2 years and another of 11 years,** you think that you killed someone untrained, nay, they gave you their bodies in plain view because we were watching." (emphasis added). The importance of this variation is the reference to "a new Muslim of 2 years." The reference to "another of 11 years" is consistent with Simpson's history, as he informed UCE-1 that he had been a Muslim for 11 years during their communications. However, UCE-1 had informed Hendricks that UCE-1 had been a Muslim for 2 years. Soofi, Simpson's actual partner in the attack, was raised a Muslim. When combined with Hendricks' statement to UCE-1 described below that he initially thought UCE-1 was killed in the attack, your Affiant believes the reference to "a new Muslim of 2 years" in this document is a reference to UCE-1 (because Hendricks mistakenly believed UCE-1 assisted with the attack, and was killed along with Simpson).

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[24] Amir Al Mu'mineen translates to the "leader of the faithful," and as previously stated, was a known alias for ISIL leader Abu Bakr al-Baghdadi.

77. On or about May 5, 2015, Hendricks, while using Social Media Application #2 account "mesecret17," communicated with UCE-1. Prior to discussing details of the Garland, Texas attack, Hendricks verified UCE-1's identity through the use of a code they had previously arranged. UCE-1 and Hendricks then discussed the Garland, Texas attack. UCE-1 claimed to have been the "eyes" of Hendricks, to have seen Simpson and Soofi be killed, and stated that "Cops almost shot me." Hendricks then directed UCE-1 to deactivate his/her Social Media Application #1 account, and asked UCE-1, "Have you seen the just paste?" Although never admitting to being involved, Hendricks stated he believed that UCE-1 had been killed at first, "Up until last night I thought that u." He then learned that UCE-1 was not killed in the attack, stating, "Bc after I added up the facts I knew it wasn't u." After UCE-1 continued to express concern that he/she was nearly killed in the attack and sorrow for Simpson and Soofi, Hendricks stated, "I thought the same thing bro. And I know that will always be a concern you will have. But listen bro, AL LA h showed you that in order to prepare you. Next time you will be twice as better iA...Don't worry. This is a example Al la h granted you. Don't let this real time lesson be in vain." Lastly, Hendricks stated to UCE-1, "Bro. Keep in touch with me. If you need a sa fe house, let me know. This is why I'm here."

78. On or about May 9, 2015, through on or about May 10, 2015, Hendricks, using Social Media Application #2 accounts "terrorwatch17" and "itsme17," communicated with UCE-1. These communications were brief, but focused on UCE-1's presence in Garland, Texas on or about May 3, 2015. Hendricks and UCE-1 required each other to provide "the code," to which the response was "17." During these conversations, Hendricks expressed concern as to whether UCE-1 displayed his/her Social Media Application #2 account online. Hendricks also

expressed concern about the possibility of UCE-1 having used his/her cellular phone on the date of the attack (asking if it pinged off a "tower locally") and further directed UCE-1 to consider changing his/her cellular phone.

79. On or about May 11, 2015 through on or about May 13, 2015, Hendricks, using Social Media Application #2 account "itsme17," communicated with UCE-1. During this communication, Hendricks and UCE-1 discussed an unknown individual for recruitment into Hendricks' terrorist cell. Hendricks specifically requested that UCE-1 provide social media application information for the individual. In response to UCE-1 asking, "Should we bring him into the circle?," Hendricks replied "Indeed. He is a good brother." Hendricks also stated that "Hijra" will "take 50/100 acres. Legally purchased." [The term "hijra" refers to a "migration." In this context, the term is likely referring to like-minded Muslims residing on compounds within the United States.] Hendricks then added, "It will be hidden in plain sight...Farm, house, garden, tunnels...5 in the beginning stages across the country...Satillite places near." Your Affiant believes that Hendricks was referring to his continued interest in purchasing land for the formation of training camps to be used by his terrorist cell.

80. On or about May 13, 2015 through on or about May 14, 2015, Hendricks, using Social Media Application #2 account "itsme17," briefly communicated with UCE-1. During this communication, Hendricks asked UCE-1 if he/she had contacted another individual and stated

"The 6th pillar is not for the weak."[25] Also during this communication, Hendricks provided UCE-1 with a new Social Media Application #2 account, "dontcatch17."

81. On or about May 17, 2015, UCE-1 attempted to communicate with Hendricks, at his Social Media Application #2 account "dontcatch17," but received no response.

CONCLUSION

82. Based on the foregoing, your Affiant believes that there is probable cause to show that between on or about March 1, 2015, and on or about May 31, 2015, Erick Jamal Hendricks conspired with CW-1 and others known and unknown, to provide material support, including personnel and services, to ISIL, a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B(a)(1), and that Hendricks and others committed overt acts in furtherance of the conspiracy in the Northern District of Ohio.

Shawn Scott Hare
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me 8/3/16 :

KENNETH S. MCHARGH
UNITED STATES MAGISTRATE JUDGE

[25] There are 5 "pillars" within Islam. However, those who subscribe to an extremist version of Islam, often refer to the commission of jihad as the "6th pillar."