AO 91 (Rev. 08/09) Criminal Complaint

UNDER SEAL

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

FILED
JUL - 7
CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

United States of America
v.
Haris Qamar

Case No.: 1:16mj 300

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 26, 2016, through June 10, 2016, in the county of Arlington in the Eastern District of Virginia and elsewhere, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. section 2339B	Attempt to provide Material Support to a designated terrorist organization

This criminal complaint is based on these facts:

See Attached Affidavit

☐ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

Assistant United States Attorney Gordon D. Kromberg

Complainant's signature

Printed name and title

Nicholas Caslen, Special Agent, FBI

Sworn to before me and signed in my presence.

Date: 07/ 07/2016

/s/
John F. Anderson
United States Magistrate Judge

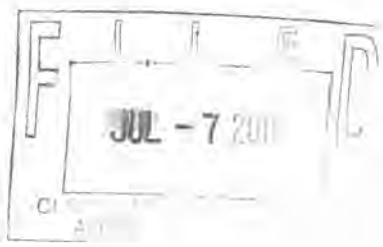
Judge's signature

City and state: Alexandria, Virginia

John F. Anderson, U.S. Magistrate Judge

Printed name and title

UNDER SEAL



IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES,	)	
	)	Case No.: 1:16mj 300
v.	)	
	)	
HARIS QAMAR	)	UNDER SEAL

ORDER TO SEAL

The UNITED STATES, pursuant to Local Rule 49(B) of the Local Criminal Rules for the United States District Court for the Eastern District of Virginia, having moved to seal the criminal complaint, the arrest warrant, the Motion to Seal, and proposed Order in this matter; and

The COURT, having found that revealing the material sought to be sealed would jeopardize an ongoing criminal investigation; having considered the available alternatives that are less drastic than sealing, and finding none would suffice to protect the government's legitimate interest in concluding the investigation; and finding that this legitimate government interest outweighs at this time any interest in the disclosure of the material; it is hereby

ORDERED, ADJUDGED, and DECREED that the criminal complaint, arrest warrant, Motion to Seal, and this Order be Sealed until the defendant is arrested, at which point all those documents will be unsealed without further order of the Court.

/s/ JFA
John F. Anderson
United States Magistrate Judge
JOHN F. ANDERSON
UNITED STATES MAGISTRATE JUDGE

Date: July 7, 2016
Alexandria, Virginia

UNDER SEAL

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

FILED
JUL - 7 2016

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 1:16mj 300
	)	
HARIS QAMAR	)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nicholas Caslen, after being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), assigned to the Washington Field Office, Joint Terrorism Task Force ("JTTF"). I have been an FBI Special Agent since 2011, and worked on the JTTF in both Wichita, Kansas, and Washington, D.C. As part of my duties, I investigate potential criminal and terrorism-related activities associated with suspected Homegrown Violent Extremists. I have participated in numerous counterterrorism investigations, during the course of which I have conducted physical surveillance, executed court authorized search warrants, and used other investigative techniques to secure relevant information regarding various crimes.

2. This affidavit is submitted in support of a criminal complaint charging Haris Qamar with attempting to provide material support and resources to a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B.

3. I have personally participated in this investigation and have witnessed many of the facts and circumstances described herein. I have also received information related to this investigation from other law enforcement and government officials. The statements contained in

this affidavit are based on my own observations, review of documents, recordings, and reliable information provided to me by other law enforcement officials.

4. This affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant. As a result, it does not include each and every fact observed by me or known to the government. This affidavit summarizes the content of certain recorded communications, which were recorded pursuant to the consent of at least one party to the communication. The majority of these recorded communications were in English, with a small percentage in Arabic. When I assert that a statement was made by an individual, that statement is described in substance and in part, but my assertion is not intended to constitute a verbatim recitation of the entire statement. When I assert that a communication was made on a certain date, I mean that the communication was made "on or about" that date.

I. The Relevant Statute and ISIL

5. On 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. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO 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. Although the group has never called itself "Al-Qaeda in Iraq (AQI)," this name has frequently been used to describe it through its history. On

September 21, 2015, the Secretary added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS. To date, ISIL remains a designated FTO.

6. Pursuant to Title 18, United States Code, Section 2339B, it is unlawful for any person to attempt to provide material support or resources to an FTO.

7. Based on my training and experience, I know that: (a) Sunni extremists and others, who are not citizens or residents of Syria and Iraq, are traveling to Syria and Iraq to join ISIL and commonly enter Syria by crossing the border from Turkey; (b) foreign fighters from Western countries are traveling to locations in Turkey, including Istanbul, and then traveling to towns closer to the border where they enter into Syria to join ISIL; (c) Abu Baker al-Baghdadi is the current leader of ISIL; and (d) ISIL is also frequently referred to as ISIS (an acronym for the Islamic State of Iraq and al-Sham or the Islamic State of Iraq and Syria).

8. Haris Qamar ("Qamar") is a United States citizen who was born in 1990 in Brooklyn, New York, and resides in Burke, Virginia. Qamar is employed by a company known as Public Storage and works at various storage facilities in Northern Virginia.

II. Qamar and Twitter

9. Between May 2015 and April 2016, the FBI became aware of a series of Twitter accounts using variations of the handle "newerajihadi" that were openly supportive of ISIL. Examination of Twitter records and posts publicly placed on Twitter reflect that over 60 accounts that included "newerajihadi" in the account name (such as "newerajihadi21; newerajihadi22; newerajihadi23, etc.) were closed by Twitter; new accounts with higher numbers appended to the "newerajihadi" body were opened shortly after Twitter closed each of the accounts with lower numbers.

10. For example, terrorists murdered employees of the Charlie Hebdo magazine in Paris, France, in January 2015. In September 2015, the user of the Twitter account with the handle @newerajihadi20 tweeted his prayer for another similar attack with even greater casualties.

11. On October 28, 2015, the profile photograph on the Twitter account with the handle @newerajihadi20 was a still image from a video released by the Islamic State; the image depicted blood flowing off what appeared to be a white tarp into a collection point. The video from which the still image is derived depicts what appears to be the beheading of blindfolded prisoners by ISIL members near flags bearing ISIL's black flag, and a quote from the Koran directing faithful Muslims to "strike their necks." The still photograph used as the profile photograph for the Twitter account with the handle @newerajihadi20 appears to be the collection of the blood from the prisoners beheaded in the video.

12. On November 2, 2015, the profile photograph on the Twitter account with the handle @newerajihadi21, was a photograph of an ISIL member and murderer known as "Jihadi John" beheading an purported Syrian pilot. I know that this photograph comes from a still image of a video depicting "Jihadi John" and several other ISIL terrorists beheading a group of purported Syrian pilots. In the video, "Jihadi John" speaks to President Obama, saying that "today, we're slaughtering the soldiers of Bashar [Syrian President Bashar Al-Assad], and tomorrow we will be slaughtering your soldiers." In the video, "Jihadi John" goes on to say that ISIL "will begin to slaughter your people on your streets."

13. On November 6, 2015, the user of another Twitter account accused the user of @newerajihadi23 of being a supporter of the Islamic State while living off of welfare; in response, the user of the Twitter account with the handle @newerajihadi23 tweeted that he wished he could "use your tax money to Support The Islamic State."

14. On November 6, 2015, the user of the Twitter account with the handle @newerajihadi23, tweeted his prayer that Europe would be conquered "and Auschwitz will be opened again" for non-believers.

15. On November 13, 2015, ISIL terrorists attacked civilians at multiple locations in Paris, France, and murdered more than 100 people. On November 17, 2015, the profile photograph on the Twitter account with the handle @newerajihadi26, was a photograph of dead bodies and blood on the floor of the Bataclan theatre, where ISIL terrorists murdered over 80 people.

16. On November 14, 2015, the user of the Twitter account with the handle @newerajihadi25, in response to a tweet from another individual who appeared to be a member of the U.S. military, tweeted his wish that more veterans would commit suicide, and "Enjoy your trip to hellfire."

17. On March 15, 2016, the user of the Twitter account with the handle @newerajihadi77 posted a photograph containing the media logo for ISIL's media group, and depicting ISIL terrorists trying to tear the heads off of two prisoners of ISIL whose throats had just been slit so deep that they were nearly decapitated. The user of the Twitter account with the handle @newerajihadi77 tweeted this photograph to another Twitter user stating "lol don't worry we r coming for you heathens."

18. On March 19, 2016, in response to a post by another Twitter user regarding damages done by airstrikes in the ISIL capital of Raqqa, Syria, the user of the Twitter account with the handle @newerajihadi79 posted "May Allah swt take revenge on kuffar and kill their families."

19. The FBI identified Qamar as the user of the "newerajihadi" handles on Twitter through records received from Twitter, Inc., and cable and phone companies, as well as through

a confidential witness (who is described further below). First, internet protocol ("IP) records provided by Twitter, Inc., reveal that the Twitter account with the handle @newerajihadi9, was accessed by a particular IP address accessed through Cox Communications. According to information received by the FBI from Cox Communications, that IP address in May 2015 was assigned to Qamar's residence in Burke, Virginia, through an account registered to Qamar's mother. Further, a phone number for which Qamar was the subscriber was provided to Twitter in connection with the opening of Twitter accounts @newerajihadi21; @newerajihadi24; @newerajihadi25; @newerajihadi32; and @newerajihadi33.

20. The conclusion that Qamar was the user of the "newerajihadi" handles on Twitter was confirmed by a confidential witness ("CW"). CW is a United States citizen who has provided information to the FBI since May 2013. None of the information that he has provided has been shown to be unreliable. CW receives money from the FBI for his services.

21. CW has associated with Qamar as a friend since September of 2015, and since that time they have met in person on numerous occasions, and also followed each other on social media. CW led Qamar to believe that CW's cousin ("Cousin") joined ISIL. Except for their meetings on September 6 and September 11, 2015, all conversations between CW and Qamar are documented on recordings provided to the FBI by CW.

22. CW reported that, between September 2015 and June 2016, CW often communicated with Qamar through social media, including through Twitter private messaging on accounts using variations of the name "newerajihadi." CW reported that Qamar was the user of the Twitter accounts using handles with variations of the name "newerajihadi." For example, on September 3, 2015, Qamar used the Twitter account with the handle @newerajihadi20 to communicate with CW via direct messaging. CW reported that Qamar often notified him of

Qamar's successive "newerajihadi" Twitter handles when the previous one was closed by Twitter. In a recorded conversation, on June 17, 2016, CW asked Qamar which "newerajihadi" account Qamar was using when CW first met Qamar. Qamar answered that he and CW have known each other for about a year, and that Qamar was using the "newerajihadi4" account or "newerajihadi7" account when they first met. Qamar said that he had gone through almost 100 accounts since then.

23. CW's information that the Twitter accounts with handles that included the name "newerajihadi" were maintained by Qamar is corroborated by Qamar's public tweets, in which he announced the use of his new Twitter handles to replace the handles from previous accounts that were closed by Twitter. I obtained screen shots of many of those public tweets.

III. Qamar and Violence

24. "Flames of War" is a 55-minute long video released by ISIL and narrated by an individual speaking English with an American accent. The film highlights ISIL's seizure of a Syrian Army base near Raqqah, Syria, and shows captured Syrian soldiers being shot point-blank in the back of the head and then falling into the graves that they had just been forced to dig. The film finishes with a statement from Abu Bakr Al-Baghdadi, the leader of ISIL, that ISIL is waiting to fight United States combat forces. During various conversations recorded by CW, Qamar discussed videos produced by ISIL that Qamar had viewed online. Qamar told CW that he had seen "Flames of War" numerous times.

25. On October 2, 2015, Qamar told CW that Qamar loved the bodies, blood and beheadings. Qamar told CW that, when it comes to brutality on the kuffar, he has an "unlimited appetite."

26. On October 29, 2015, Qamar told CW that Qamar recalled watching a video of a Kurdish individual being slaughtered, and liked the cracking sound made when the individual's spinal cord was torn. Qamar told CW about a video he saw where an individual was executed by being run over by a tank; Qamar said that he watched it five times and that it was beautiful.

27. On several occasions Qamar has told CW that he could slaughter someone, and described how he would do it. For example, on October 16, 2015, Qamar told CW that Qamar could slaughter someone if given the option. On June 3, 2016, Qamar described how he would slaughter someone with a butter knife.

28. On November 14, 2015, Qamar spoke to CW regarding the attacks that occurred in Paris, France on November 13, 2015. Qamar stated that when he heard the statement by the spokesman for ISIL taking credit for the attacks, he was "giddy." Qamar stated that he admired lone wolf attackers because they love Islam so much that they are willing to die as martyrs for Islam. In the same conversation, Qamar and CW discussed suicide bombings. CW said that he did not believe in suicide bombings, but Qamar responded "I believe in it 100%."

29. On November 20, 2015, Qamar asked CW if CW would ever use a table saw to behead someone. CW responded that he could not do so. Qamar made the noise of a saw and said that he would love to do it, and that he would do it for fun. Qamar stated that he could think of so many creative ways to behead someone. Qamar told CW that he (Qamar) likes carnage.

30. On April 2, 2016, Qamar told CW about how some Sunni Muslims blame their women for being raped. When CW asked Qamar what Qamar would like to do to those people, Qamar said "stick a fucking knife, and just make a slurpee out of their blood." Qamar added, "I'd love to drink a blood slurpee, little bit uh, sugar cane juice in it, perfect."

31. On April 22, 2016, during a meeting with CW, Qamar expressed his desire to behead someone. Qamar said that he would like to ask Cousin what the inside of a throat looks like, and suggest that, "when they start slaughtering," Cousin could drink the blood for Qamar. When CW told Qamar that Cousin was not the type of person who would behead anybody, Qamar said that "No, I'm more about slicing the throat and just sticking my hand inside his throat trying to make my hands nice and warm." Qamar told CW that Qamar was thinking about "slicing someone's throat up and then just sticking your hands, and just tearing it apart."

IV. Qamar and the "Kill List"

32. On September 11, 2015, a "kill list" was posted to the internet by terrorists connected with ISIL, containing the names and addresses of members of the U.S. military. A few days later, Qamar told CW that the residences of several soldiers who appeared on that "kill list" were near Qamar's own home, and that Qamar had observed undercover police cars near those residences. On October 29, 2015, and again on May 12, 2016, Qamar reminded CW of the addresses on the kill list, and told CW the name of the street.

33. On September 16, 2015, from Twitter account with handle @newerajihadi20, Qamar tweeted his prayer that Allah "give strength to the mujahideen to slaughter every single US military officer." As noted above, I know Qamar was the user of this account because he used it on September 3, 2015, to communicate with CW via direct messaging -- and the profile photo for that account depicts the collection of blood from beheaded prisoners.

34. The FBI confirmed that two residences on the list are, in fact, within two miles of Qamar's residence. In light of Qamar's statement to CW that Qamar observed undercover police cars near those residences, I believe that Qamar likely drove past those residences after their occupants were included on the "kill list."

V. Qamar and Discussion About Traveling to Join ISIL

35. On September 25, 2015, Qamar told CW that Qamar tried to join the Islamic State in 2014, but that his parents prevented him from going. Qamar said that his parents threatened to notify law enforcement authorities. Qamar said that he fought with his father and called his father a traitor to Islam.

36. On October 9, 2015, Qamar told CW that, prior to traveling to join the ISIL, Qamar was trying to get a passport renewed because his old passport had expired. Qamar said that his parents control his passport, and that he tried to go without them finding out. He said that he attempted to get his passport from his parents when he got a new job by telling them he needed it as a second form of identification. On January 4, 2016, Qamar told CW that he tried to get a new passport in person, but was told that he needed his expired passport to renew it or his birth certificate to obtain a new one. Qamar said that he was unable to leave because his passport had expired, and that he was unable to renew it because his parents took it and his birth certificate away from him. On March 16, 2016, Qamar told CW that he bought a ticket and lost $700.

37. On November 18, 2015, CW asked Qamar if his father gave him back his passport would he go and join ISIL. In response, Qamar said, if that happened, "I'm done, I leave."

38. Qamar's statements to CW are corroborated by independent records. According to records obtained from TAP Air Portugal, on July 22, 2014, Qamar purchased a ticket to fly from Newark, New Jersey, to Istanbul, Turkey on July 27, 2014, for $686.85, but failed to show up for the flight. I know that the TAP Air Portugal record is for the Harris Qamar that is the subject of this affidavit, because, according to AT&T records, Haris Qamar, of Burke, Virginia, is the subscriber of the phone number that was provided to the airline in connection with the purchase

of the ticket. Moreover, the ticket was purchased through a pre-paid VISA card that was registered on-line using Qamar's name, address, and phone number.

VI. Qamar Expresses Ambivalence About Traveling to Join ISIL

39. On September 18, 2015, Qamar quoted Anwar al-Awlaki, and, referring to dying on the battlefield as a martyr for Islam, told CW that "you either die a shaheed or you die a coward."

40. On October 16, 2015, CW told Qamar that Qamar did not have to travel to join ISIL in order to be seen as a martyr in the eyes of Allah, and that he would die a martyr for Islam so long as his heart was on the battlefield, even if he dies in his bed. Qamar responded that Qamar did not want to risk going to hell, and that dying as a martyr on the battlefield was a guaranteed way of avoiding that risk.

41. On November 20, 2015, CW and Qamar spoke about Qamar joining and/or aiding the Islamic State. Qamar said that his parents knew that he was a fan of the Islamic State, and that, as a result, his parents wanted him to get married. Qamar said that he told his parents that he would not marry anyone that was not a supporter of the Islamic State. Qamar said that, even if he had a nice house and a profitable business, he would attempt to find a way to funnel money to the Islamic State until he left the country or got caught. He said that he wanted to live and have his kids in the Islamic State, and not in the United States

42. On November 28, 2015, Qamar initially told CW that the only thing keeping Qamar in the United States was his family, and he would join the Islamic State if he did not have a family. Qamar then claimed that that he would in fact go despite his family, but that they were controlling his passport.

43. On December 1, 2015, Qamar told CW that, if Qamar's father learned that Qamar joined the Islamic State, his father would sell their house, destroy his youngest brother, and possibly commit suicide.

44. On December 3, 2015, Qamar told CW that Qamar felt like he needed to start preparing for a trip to join the Islamic State, such as by saving money. Qamar said that he needed to be ready to go if Qamar and CW needed to go at a moment's notice. Qamar speculated that he should buy a plane ticket and have it ready.

45. On December 16, 2015, CW told Qamar that CW planned to travel overseas for the purposes of joining ISIL. CW told Qamar that there was a small window of opportunity for both of them to go join "Dawlah." Qamar told CW "Insha'Allah when you do go I'll follow insha'Allah soon after. Save me a spot."

46. On January 7, 2016, CW and Qamar again discussed CW's plans to join ISIL, and the possibility of Qamar joining him in doing so. Qamar said that he wanted to go, but that his parents did not want him to do so. Qamar told CW about a fight that Qamar had with his father and brother about Qamar's support for the Islamic State in late 2015. Qamar exhibited ambivalence when CW offered to help Qamar obtain a new birth certificate so that he could obtain a new passport without his parents' knowledge.

47. On January 12, 2016, Qamar told CW that Qamar wanted to fight for the Islamic State for the sake of Allah, but that he did not want to "jump on the train" and follow everyone, or do so because of peer pressure. When CW asked whether Qamar felt that CW was pressuring Qamar to join the Islamic State, Qamar responded "No, no no."

48. On January 27, 2016, CW told Qamar that it appeared that Qamar was not ready to travel to join the Islamic State. In response, Qamar said that "insha'Allah one day." Qamar

stated that his father would die of shock if Qamar left the United States to join the Islamic State, and that Qamar was concerned about what would happen to his mother and youngest brother.

49. On February 14, 2016, Qamar told CW of Qamar's frustration that, despite his wish to sever heads, he could not "do anything from here. I can't do anything and I can't take it."

50. On February 27, 2016, Qamar told CW that he was jealous of the "brothers" fighting for the Islamic State, and prayed that someday he would end up over there. Qamar again spoke of his frustration because he could not do anything in the United States.

51. On March 16, 2016, CW told Qamar that, due to issues with his connections overseas, CW no longer could travel to join the Islamic State. Qamar consoled CW, saying "trust me, we'll go one day...we'll go one day insha'Allah, we will have money and we will go and we'll go at a time where, we'll see we'll see."

52. In April 2016, media sources reported that Khweis Mohammed Jamal, a former resident of Alexandria, Virginia, defected to Kurdish forces after traveling to Iraq and joining ISIL. In a conversation on April 2, 2016, and apparently referring to Khweis, Qamar told CW that Khweis was an idiot for leaving ISIL, and indicated that Qamar would have liked to have traded places with Khweis.

53. On April 2, 2016, CW told Qamar that Cousin had successfully made it to an Islamic State camp and was working with ISIL to help bring fighters to the Islamic State from the West.

54. During a conversation on April 25, 2016, Qamar said that he would do anything to be able join the Islamic State, but that his biggest obstacle was his parents. CW said that Qamar needed to respect his parents. Qamar said that his parents were asking him to do something that was tearing his heart apart. CW said that the reality was that they (Qamar and CW) could not go

to join the Islamic State now. Qamar said that "if the most we can do" is just send help from here, he would try to do so.

VII. Qamar and the ISIL Lone Wolf Propaganda Video

55. On May 26, 2016, Qamar and CW discussed a video that ISIL was purportedly making to encourage lone wolf attacks in Washington, D.C. CW told Qamar that Cousin was assisting the Islamic State in making that video, and had asked CW to provide photographs of possible targets in and around Washington, D.C., for use in the video. In response, Qamar offered CW ideas of where to go to take these photographs. Qamar's list included a number of D.C. area locations and landmarks, including specific locations and landmarks in Arlington, Virginia, which could be targeted for terrorist attacks. Qamar said that one of those locations was a particularly good target for attack "because it is fucking terrifying."

56. Qamar said that taking photographs and providing them to the Islamic State was different from being a "fanboy" online, and constituted active support for ISIL. Qamar said that, once the photos come out in the video, the U.S. government would try to figure out who took the photos. Qamar told CW that phones have GPS, and everything is recorded. Qamar said that, as a result, that CW should purchase and use a cheap digital camera for the photos instead of taking them with his cell phone. Qamar reminded CW to pay cash for the camera and not use a credit card. Qamar told CW to upload the pictures to the internet via a wi-fi connection at a coffee shop or store that provides a wi-fi connection, and to use anonymization software.

57. On June 3, 2016, Qamar offered to assist CW in taking the photographs. That same day, CW picked up Qamar in Springfield, Virginia, in a car that the FBI had fitted with a video recorder. CW wore an audio recorder.

58. In the car, CW told Qamar that Cousin loved Qamar's ideas about targeting particular D.C. area locations and landmarks. CW said that CW was going to drive by those places, because Cousin wanted the pictures that very week. As CW drove them to a location in Arlington, Virginia with a view of particular locations and landmarks in Virginia and Washington, D.C., Qamar told CW that they should take pictures along the way. As Qamar and CW approached that location, Qamar began to take video and photographs outside the car window. Qamar told CW that they needed to make sure that they kept their reflections out of the mirrors lest the government identify them through finding their reflection in a mirror on a photograph.

59. As Qamar and CW arrived, I saw them taking photographs at the above mentioned location in Arlington, Virginia. I saw Qamar taking photographs as CW held something out in front of Qamar. As explained below, CW later provided to me the camera used by Qamar and CW to take those photographs; I could then see that the photograph taken by Qamar was that of a cell phone (that I know to have been held by CW) bearing a photo of the black flag of ISIL in the foreground, with a view of a potential target of a terrorist attack in the background.

60. After that location, CW and Qamar headed across the 14th Street Bridge into Washington, D.C. CW reported that, as CW drove the car, Qamar took photographs of various landmarks and locations in Washington, D.C. CW and Qamar then drove back into Virginia across the 14th Street Bridge. As they drove past the Pentagon, Qamar took a video of the Pentagon and yelled a slogan indicating support for the expansion of ISIL. Qamar said "bye bye DC, stupid ass kufar, kill'em all". Qamar said that he hates the United States and hates being here; he said that he gets a "burning sensation in my body because this place is so disgusting."

61. After Qamar and CW stopped for dinner, Qamar said that he learned to be a chameleon, and that he could lie about anything. When CW asked if Qamar was lying about his support for ISIL, Qamar said that he was not lying about that. Qamar said, "I'm a professional liar, how do you think I'm a Dawlah supporter and no one fucking knows?"

62. After dinner, Qamar reminded CW to check the photographs before uploading to ensure that they did not contain reflections of Qamar or CW. Qamar advised CW to open a Gmail account, and upload the photographs to that account. Rather than emailing the photos to Cousin, Qamar advised CW to give Cousin the user name and password for the Gmail account, so that Cousin could log into the account and download the photographs himself. Qamar said that if CW gets caught, CW could claim the account was hacked.

63. CW paid for their dinner after Qamar realized that Qamar left his money in Qamar's car when CW picked him up earlier that day. When CW dropped Qamar off at Qamar's car, Qamar gave CW money to cover his portion of the cost of the dinner. Later, they arranged to meet again on June 10, 2016, to take additional photographs for use in an ISIL video.

64. CW provided to me the camera containing the photos taken by CW and Qamar on June 3, 2016, as well as the audio recording of his meeting with Qamar.

65. On June 10, 2016, CW and Qamar met again with the purpose of taking additional photographs to provide to Cousin. CW picked Qamar up in Springfield, Virginia, and they drove to a particular location in Arlington, Virginia. At that location, I saw Qamar taking photographs. Qamar and the CW then proceeded to two other landmarks in Arlington, Virgina, and were observed taking photographs at each location by FBI personnel.

66. CW reported that, later in the evening, Qamar asked CW where the orders were coming from to take the photographs. Qamar said he did not care, as long as the photographs

were going to Dawlah. Qamar asked whether CW had uploaded the photographs taken on June 3rd, in the manner in which Qamar coached CW to do so (and was told that CW had done so).

Conclusion

67. Based on the foregoing, there is probable cause to believe that, between on or about May 26, 2016, and June 10, 2016, in Arlington County and elsewhere in the Eastern District of Virginia, Haris Qamar knowingly attempted to provide material support and resources to a foreign terrorist organization, namely ISIL, in violation of 18 U.S.C. § 2339B.

Wherefore, I request the issuance of an arrest warrant pursuant to the Federal Rules of Criminal Procedure.

FURTHER THIS AFFIANT SAYETH NOT.

Nicholas Caslen
Special Agent, FBI

Subscribed to and sworn before me on this 7th day of July, 2016.

/s/
John F. Anderson
United States Magistrate Judge
JOHN F. ANDERSON
UNITED STATES MAGISTRATE JUDGE