

United States District Court  
NORTHERN DISTRICT OF GEORGIA

JAN 16 2019

U.S. MAGISTRATE JUDGE  
N.D. GEORGIA



UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

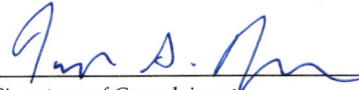
HASHER JALLAL TAHEB

Case Number: 1:19-MJ-33

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about January 16, 2019 in Gwinnett County, in the Northern District of Georgia, defendant did, attempt to damage or destroy, by means of fire or an explosive, a building or real property in whole or in part owned or possessed by, or leased to, the United States, that is: the White House, in violation of Title 18, United States Code, Section 844(f)(1).

I further state that I am an FBI Special Agent and that this complaint is based on the following facts:  
PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes



Signature of Complainant  
Tyler S. Krueger

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to before me, and subscribed in my presence

January 16, 2019

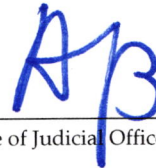
Date

at Atlanta, Georgia

City and State

ALAN J. BAVERMAN  
UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer  
AUSA Ryan K. Buchanan



Signature of Judicial Officer

**AFFIDAVIT OF FBI SPECIAL AGENT TYLER S. KRUEGER**

I, Tyler S. Krueger, being duly sworn, state the following:

**AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since August, 2014. I am currently assigned to the Federal Bureau of Investigation (FBI) Atlanta Field Office and responsible for investigating international terrorism activity. As part of these investigations, I have participated in physical surveillance, worked with informants, conducted interviews, served subpoenas, and executed search warrants. Prior to that, I was employed as an Intelligence Analyst with the Federal Bureau of Investigation for approximately six years, during which time I researched and analyzed intelligence related to counterterrorism matters.
2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information I obtained from various law enforcement agents and others. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included in this affidavit every detail of every aspect of the investigation. Rather, I have set forth facts that I believe are sufficient to establish probable cause in support of an application for a criminal complaint and arrest warrant for Hasher Jallal Taheb, for a violation of Title 18 U.S.C. § 844(f)(1), attempt to damage by means of explosive any building owned, possessed, or leased by the United

States or any department or agency thereof, or any institution or organization receiving Federal financial assistance. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

### **STATEMENT OF PROBABLE CAUSE**

3. In or about March 2018, a member of a local law enforcement agency contacted the FBI and reported that a community member had relayed concerns about Taheb to the local law enforcement agency. Particularly, the community member noted that Taheb had become radicalized, changed his name, and made plans to travel abroad.
4. On or about August 25, 2018, Taheb advertised his vehicle for sale, after which an FBI Confidential Human Source (CHS #1) said he was interested in purchasing Taheb's vehicle. On or about September 2, 2018, Taheb met an FBI Undercover Employee (UCE #1) for the same reason.
5. On or about October 28, 2018, Taheb met with CHS #1 in Cumming, Georgia. Taheb advised CHS #1 that he (Taheb) planned to travel overseas for "hijra,"<sup>1</sup> and planned to sell his car to fund his travel. In or about July 2018, Taheb had applied for a United States passport and said that his previous passport had been misplaced. Because he had no passport, Taheb could not travel abroad, and he advised CHS #1 that he wished to conduct an attack in the United States against targets

---

<sup>1</sup> Based on my training and experience, and information from other agents, I know that "hijra" is a term used to refer to traveling to territory controlled by the Islamic State.

such as the White House<sup>2</sup> and the Statue of Liberty. Taheb advised CHS #1 that jihad was the best deed in Islam and the peak of Islam. Taheb further stated that it was not complicated at all to do jihad today.

6. On or about December 2, 2018, Taheb arranged a meeting with CHS #1 and UCE #1. During the meeting, Taheb advised that if they were to go to another country, they would be one of many, but if they stayed in the United States, they could do more damage. Taheb explained that jihad was an obligation, that he wanted to do as much damage as possible, and that he expected to be a "martyr," meaning that he expected to die during the attack.
7. On or about December 7, 2018, Taheb met UCE #1 in Alpharetta, Georgia. While seated in UCE # 1's vehicle, Taheb showed UCE #1 a hand-drawn diagram of the ground floor of the West Wing of the White House in Washington, D.C. Taheb's drawing of the floor plan layout was in a composition notebook. Taheb referenced his drawing during the meeting and described his plan for attacking the West Wing of the White House. During the meeting, Taheb told UCE #1 that Taheb would be the leader of their "jamaat,"<sup>3</sup> which is comprised of Taheb, UCE #1 and CHS #1. Taheb tasked UCE #1 with obtaining weapons and explosives needed to conduct the attack.

---

<sup>2</sup> The White House, located in Washington, D.C., is a building and real property in whole or in part owned and possessed by the United States.

<sup>3</sup> Based on my training and experience, "jamaat" means a group and Taheb further defined jamaat as a group of three or more.

8. On or about December 7, 2018, Taheb and UCE #1 discussed selling or exchanging their cars for weapons and explosives. They also discussed the types of weapons and explosives Taheb wanted to use to conduct the attack.
9. On or about December 7, 2018, Taheb noted that if he sold his car now, there would be a lot of suspicion from his family, but if they were in the final stage of their plan, then he would not mind selling it. Taheb added that he also believed CHS #1 would sell his vehicle. Later, Taheb added, "at this point, since it is the three of us, it would be considered a martyrdom operation." He said the group would fight to the end and make it a big bang.
10. On or about December 9, 2018, Taheb texted UCE #1 and asked, "...How's grocery shopping?"<sup>4</sup> UCE #1 replied, "...I made initial contacts. Just getting started. I'm gonna need to go down to Columbus at some point to keep up the shopping momentum..." When UCE #1 asked Taheb how "game day planning" was going, Taheb replied, "It's coming along well..." and offered to go with UCE #1 to Columbus, Georgia, to pursue the weapons and explosives Taheb had tasked UCE #1 to obtain.
11. On or about December 14, 2018, UCE #1 met with Taheb in Cumming, Georgia. Taheb broadened his prospective targets in the Washington, D.C. area and indicated he wished to attack the Washington Monument, the White House, the Lincoln Memorial, and a specific

---

<sup>4</sup> Your affiant understands that "grocery shopping" refers to UCE #1's efforts to procure weapons.

synagogue. Taheb again brought hand-drawn sketches of the White House to the meeting. Taheb again outlined the types of weapons he wished to use in the attacks, including semi-automatic weapons, improvised explosive devices, an AT-4,<sup>5</sup> and hand grenades. Taheb stated to UCE #1 that he (Taheb) may have another source from which he could obtain weapons. Also during this meeting, Taheb discussed the need for a base and stated that it would allow them to regroup and give them a place for Taheb to give a speech to motivate people. Taheb wanted the base to be a place to allow for the recording of a video. He stated he would be the narrator, clips of oppressed Muslims would be shown, and American and Israeli flags would be burned in the background. Taheb stated that he created a channel on a video-sharing website to post the video before the actual attack happened. After the meeting, Taheb and UCE #1 began communicating via an encrypted peer-to-peer social media messaging application.

12. On or about December 14, 2018, Taheb, using the social media messaging application noted above, sent UCE #1 a link to a document on Google Docs. UCE #1 downloaded this document, authored by Taheb. The file name was, in part, named "Ghurabah"<sup>6</sup> and the document was 40 pages long. The document, authored by Taheb, included the importance of jihad, specifically "defensive jihad," which

---

<sup>5</sup> An AT-4 is a shoulder-fired anti-armor weapon.

<sup>6</sup> Based on my training and experience, ghurabah is an Arabic word for stranger or foreigner. Your affiant understands that foreign jihadis who travel to fight often call themselves "ghurabah."

Taheb noted was his justification for creating and leading his group to conduct violent attacks.

13. On or about December 15, 2018, Taheb created a group chat on the social media messaging platform noted above and added UCE #1 and CHS #1 to the group. Taheb, UCE #1, and CHS #1 began communicating via group conversation beginning on or about December 15, 2018.
14. On or about December 17, 2018, Taheb sent the social media messaging group a link to a lecture by Anwar al-Awlaki<sup>7</sup> regarding lessons from former "Mujahideen."<sup>8</sup>
15. On or about December 19, 2018, UCE #1, using the social media messaging application noted above, provided the pricing for the weapons and explosives in which Taheb had expressed interest.
16. On or about December 25, 2018, Taheb, using the social media messaging application noted above, relayed to UCE #1 the necessity for action. UCE #1 responded that they are blessed to be in a position to take action. Taheb replied, in part, "Very soon inshallah..."<sup>9</sup>
17. On or about December 28, 2018, UCE #1 asked Taheb, via the social media messaging application noted above, if the other brothers were still thinking about the "requirement for action." Taheb responded

---

<sup>7</sup> Anwar al-Awlaki was an Islamic lecturer and a leader of Al-Qaeda in the Arabian Peninsula ("AQAP"), a Yemen-based designated foreign terrorist organization that claimed responsibility for terrorist acts against targets in the United States, Saudi Arabia, Korea, and Yemen since its inception in January 2009. Pursuant to a Presidential Executive Order, al-Awlaki was designated by the United States as a "Specially Designated Global Terrorist" on July 12, 2010. Al-Awlaki was killed in Yemen in September 2011.

<sup>8</sup> Based on my training and experience, mujahideen refers to Muslims who proclaim themselves warriors for the faith.

<sup>9</sup> Based on my training and experience, inshallah is an Arabic word meaning, "God willing."

with, "Please give about 2 weeks inshallah. Then after we can go on our trip inshallah. May Allah allow us, support us, provide for us, and protect us." Taheb also asked, "How long would it take for groceries<sup>10</sup> to arrive?" to which UCE #1 responded "About a week after we make the order."

18. On or about January 1, 2019, Taheb, using the social media messaging application noted above, asked how many "lbs" followed by a potato emoji. UCE #1 responded that each "potato" would fit inside a backpack and that they would have to provide the backpacks.<sup>11</sup> Taheb answered, "Okay just wanted to know how far the cooking oil spreads when the fries are cut."<sup>12</sup> Taheb also stated they were definitely buying. On or about January 2, 2019, Taheb, using the social media messaging application noted above, sent links to the group for military and assault backpacks, notating with the comment, "these are cool lol."
19. On or about January 4, 2019, Taheb used the social media messaging application noted above to ask if the waiting period for the "groceries" was a week, which UCE #1 affirmed.
20. On or about January 6, 2019, Taheb used the social media messaging application noted above to tell UCE #1 that he would "...definitely give you the list tomorrow...." On or about January 7, 2019, Taheb sent a list containing "x3 arrows =1500", "x3 flaming potatos [sic] =

---

<sup>10</sup> Your affiant understands this to mean that Taheb was using the code word "groceries" when referring to weapons and explosives that Taheb tasked UCE #1 to procure.

<sup>11</sup> Your affiant understands this to mean Taheb was using the code word "potato" when referring to the ordered explosives.

<sup>12</sup> Your affiant understands this to mean Taheb wanted to know the bomb blast radius when asking how far the cooking oil spreads when the fries are cut.



3000", and "x1 spicy pepper = 2000".<sup>13</sup> In response to UCE # 1 asking if the spicy pepper goes flying, Taheb responded that it does and "You'll have the honor...." Taheb asked if everything could ship within a week, to which UCE #1 answered about a week to ten days. Taheb asked where the "recipes"<sup>14</sup> would be exchanged and UCE #1 responded that it would be in a parking lot. Taheb said he was low on cash and wanted the exchange to happen closer to Alpharetta, Georgia. Taheb also said they needed to arrive early so they could get a rental (vehicle). UCE #1 informed Taheb everyone needed to provide a backpack, and Taheb said he would look to see if he had two backpacks. Taheb asked, "If I bring a duffel would they put more in or the same amount as a regular backpack?" Taheb also asked UCE #1 when UCE #1 could pick up the bags.

21. On or about January 7, 2019, when asked by UCE #1 about the sequence of events, Taheb, affirmed that the plan was to pick up the groceries and go straight to the road trip. Taheb added, "We can go sightseeing and then the main event on Thursday. . . ."

22. On or about January 9, 2019, Taheb met with UCE #1 and provided UCE #1 with two backpacks, specifically one black backpack and one black and gray backpack. Taheb again discussed his attack plan against the White House, including martyrdom. Taheb stated that he wanted to obtain the weapons on or about January 15, 2019, travel to Washington,

---

<sup>13</sup> Your affiant understands that Taheb was using the code word "arrow" when referring to semi-automatic rifles and "spicy pepper" when referring to the AT-4.

<sup>14</sup> Your affiant understands that Taheb was referring to the exchange between the weapons and vehicles when asking where the "recipes" would be exchanged.

D.C., and conduct the attack on or about January 17, 2019. After providing UCE #1 with the backpacks, Taheb asked, "how do you . . . detonate them?" UCE #1 told Taheb the devices would be detonated with cell phones. Taheb again provided details of his plan to attack the White House. Specifically, he described his plan to use the AT-4 to blow a hole in the White House so that the group could enter. Taheb also discussed "arrows" and asked about the recoil. He said he had never shot a gun but could learn easily. He added that his plan was to go in and take down as many (people) as they possibly could. When UCE #1 brought up the AT-4, Taheb said he had watched some videos to include videos of how grenades explode. Taheb later noted that he wanted to drive on the road located behind the White House, pull up in a car, cause a distraction, and keep going until the full house was cleared or until they could no longer proceed. Taheb stated the backpacks were for destruction and "martyrdom."

23. On or about January 9, 2019, UCE #1 asked Taheb if he was still planning to exchange his car for the weapons and explosives, and Taheb responded that he was still planning to do so. Taheb advised he wanted to go over plans with the group members to ensure that they did not have any doubts in their hearts.

24. On January 9, 2019, when group members discussed the weapons and explosives ordered via the social media messaging application described herein, UCE #1 asked Taheb which method of detonation he