

SEALED FILED

UNITED STATES DISTRICT COURT

AUG 14 2018

for the

Eastern District of California

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIABY
DEPUTY CLERK

In the Matter of the Search of

3111 EASTERN AVENUE, APARTMENT #26,
SACRAMENTO, CA, 95821

Case No.

2:18-SW 0668 - EFB

FILED

Nov 05, 2021

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**UNSEALED****pursuant to Order****APPLICATION FOR A SEARCH WARRANT**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

SEE ATTACHMENT A-1, attached hereto and incorporated by reference.

located in the Eastern District of California, there is now concealed *(identify the person or describe the property to be seized)*:

SEE ATTACHMENT B, attached hereto and incorporated by referenceThe basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
 18 U.S.C. Section 1546

Offense Description
 Fraud and misuse of visas, permits and other documents

The application is based on these facts:

SEE AFFIDAVIT, attached hereto and incorporated by reference.

- ☒ Continued on the attached sheet.
☐ Delayed notice days (give exact ending date if more than 30) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Special Agent Elizabeth Buckmiller, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

8-14-2018

*Judge's signature*City and state: Sacramento, California

Edmund F. Brennan, U.S. Magistrate Judge

Printed name and title

1 I, Elizabeth Buckmiller, being first duly sworn, hereby depose and state as follows:

2 **I. INTRODUCTION AND AGENT BACKGROUND**

3 1. I am an investigative or law enforcement officer of the United States within the meaning
4 of 18 U.S.C. § 2510(7), who is empowered by law to conduct investigations of, and to make arrests for,
5 offenses enumerated in 18 U.S.C. § 2516. I am a Special Agent ("SA") with the Federal Bureau of
6 Investigation ("FBI"), and have been so employed since February 2013. I was assigned to the
7 counterterrorism squad in the Sacramento Field Division beginning in July 2013. I am currently
8 assigned to the Sacramento Joint Terrorism Task Force ("JTTF"), am on the FBI's Evidence Response
9 Team ("ERT"), and am an Assistant Weapons of Mass Destruction ("WMD") Coordinator for
10 Sacramento Division. I am involved in the investigation of offenses against the United States, including
11 crimes of terrorism as set forth in Title 18, United States Code, Section 2331, *et seq*, and violations of
12 Title 18 United States Code, Section 1546, among others. I have training and experience in the
13 preparation, presentation, and service of criminal complaints and arrest and search warrants.

14 2. I am familiar with tactics, communications and operational security methods, tradecraft,
15 and techniques of terrorist organizations, including Al-Qaeda in Iraq ("AQI") and Islamic State of Iraq
16 and ash-Sham ("ISIS"). I have received specialized training regarding counterterrorism investigations,
17 operations, and disruption strategies; terrorist financing; the history of Islam and the rise of Islamic
18 extremism; Arab culture; identifying members of international terrorist organizations and their
19 associates who provide logistics, supplies, and material support; homegrown violent extremists and
20 Foreign Terrorist Organization ("FTO")-inspired attacks; and analyzing digital records and social media
21 during terrorism investigations. I have reviewed literature from the field of counterterrorism, including
22 literature specific to the region of Iraq and Syria, and I regularly review websites and other literature
23 relating to terrorism and foreign affairs. I have also received specialized training regarding improvised
24 explosives devices, biological and chemical weapons, and the use or threat of use of these weapons
25 domestically and internationally, to include use by various terrorist groups.

26 3. I have participated in more than one hundred investigations into suspected terrorism-
27 related activities. I have knowledge of various extremist groups, their ideologies, and their involvement
28 in terrorist activity. I have conducted interviews of individuals suspected of or charged with violations

1 related to terrorist activity.

2 4. In connection with my FBI employment, I have traveled overseas, including to the
3 Middle East. As part of these travels, I have interviewed witnesses overseas.

4 **II. PURPOSE OF THE AFFIDAVIT**

5 5. The FBI is investigating Omar Abdulsattar AMEEN ("AMEEN" or "Omar AMEEN")
6 and Khansaa Rashid SABRI ("SABRI") for possible violations of federal law, including 18 U.S.C. §
7 1546 (Fraud and misuse of visas, permits, and other documents), occurring between on or about
8 September 11, 2013 and on or about May 26, 2016. In sum, the evidence below shows that AMEEN has
9 engaged in violent criminal acts, that he has associated with members of terrorist organizations and has
10 himself been a member of terrorist organizations, and that both AMEEN and SABRI have made false
11 statements about the foregoing in sworn documents submitted to United States immigration authorities,
12 providing probable cause to believe that both have committed violations of Section 1546.

13 6. I make this affidavit in support of an application for a warrant to search for evidence
14 relating to this offense in the following locations:

15 a) **SUBJECTS:** The persons of Omar Abdulsattar AMEEN, date of birth December 20,
16 1973, described in Attachment A-6 attached hereto and incorporated by reference herein; and Khansaa
17 Rashid SABRI, date of birth September 26, 1981, described in Attachment A-7 attached hereto and
18 incorporated by reference herein; AMEEN and SABRI reside at 3111 Eastern Avenue, Apartment #26,
19 Sacramento, California, 95821;

20 b) **SUBJECT RESIDENCE:** 3111 Eastern Avenue, Apartment #26, Sacramento,
21 California, 95821 ("SUBJECT RESIDENCE"), which is further described in Attachment A-1 attached
22 hereto and incorporated by reference herein;

23 c) **SUBJECT VEHICLE #1:** A vehicle used by AMEEN and SABRI ("SUBJECT
24 VEHICLE #1"), described as a white, 2001 Toyota Camry, bearing California license plate 7NPZ600,
25 which is also described in Attachment A-2 attached hereto and incorporated by reference herein; and

26 d) **SUBJECT VEHICLE #2:** A vehicle used by AMEEN and SABRI ("SUBJECT
27 VEHICLE #2"), described as a silver, 2006 Toyota Highlander bearing California license plate 5UJJ442,
28 which is also described in Attachment A-3 attached hereto and incorporated by reference herein.

1 e) **SUBJECT VEHICLE #3:** A vehicle used by AMEEN ("SUBJECT VEHICLE #3"),
2 described as a red, 2010 Toyota Prius, bearing California license plate 6KAX907, which is described in
3 Attachment A-4 attached hereto and incorporated by reference herein.

4 f) **SUBJECT SAFE DEPOSIT BOX:** A Wells Fargo safe deposit held by AMEEN
5 ("SUBJECT SAFE DEPOSIT BOX"), box number 01493, which is described in Attachment A-5
6 attached hereto and incorporated by reference herein.

7 7. The facts set forth in this affidavit are based on, among other things, the following: my
8 training and experience, my personal knowledge gathered from participation in the investigation of
9 AMEEN and SABRI; information obtained from the investigative activities of other law enforcement
10 officers; my review of documents and other records related to this investigation; communications with
11 others who have personal knowledge of the events and circumstances described herein; and information
12 obtained from interviews of AMEEN and SABRI by United States government personnel. This
13 affidavit is intended to show merely that there is probable cause for the requested warrants and does not
14 purport to set forth all of my knowledge of, or investigation into, this matter.

15 8. Certain information contained herein is taken from draft translations of documents which
16 were originally primarily in Arabic and were translated by FBI language analysts. Additional
17 information herein was taken from draft transcripts of recorded conversations that transpired in English
18 and Arabic and were translated contemporaneously with the assistance of an interpreter. I have not
19 included every fact known to me in this investigation; I have included only those facts that I believe are
20 necessary to support a finding of probable cause.

21 **III. DEFINITION OF OFFENSE**

22 9. Based on my training and experience and my consultation with Assistant United States
23 Attorneys, I know that 18 U.S.C. § 1546 provides in pertinent part:

24 ... Whoever knowingly makes under oath, or as permitted under penalty
25 of perjury under section 1746 of title 28, United States Code, knowingly
26 subscribes as true, any false statement with respect to a material fact in
27 any application, affidavit, or other document required by the immigration
28 laws or regulations prescribed thereunder, or knowingly presents any such
application, affidavit, or other document which contains any such false
statement or which fails to contain any reasonable basis in law or fact...

1 Shall be fined under this title or imprisoned [to a variety of possible terms
2 based upon the nature of the offense].

3 **IV. PROBABLE CAUSE REGARDING A VIOLATION OF 18 U.S.C. § 1546**

4 **A. Brief Background Regarding Subjects of this Warrant**

5 10. Based on my review of their statements in their immigration documents and statements of
6 the witnesses interviewed by the FBI, AMEEN and SABRI are a natives and citizens of Iraq. They have
7 been married since on or about November 14, 2002.

8 11. Based on my review of California Department of Motor Vehicles ("DMV") records, I
9 know that AMEEN has a California DMV driver's license, and that AMEEN reports he is 5'4" and
10 weighs 140 pounds. I also know that AMEEN's California driver's license is in good standing. DMV
11 records also confirm SABRI has a California driver's license in good standing, and SABRI reports she is
12 5' 1" and weighs 110 pounds. DMV records for both AMEEN and SABRI list their residence as 3111
13 Eastern Avenue, Apartment #26, Sacramento, California, 95821 (**SUBJECT RESIDENCE.**)

14 12. Based on a review of recent law enforcement surveillance, as recently as on or about
15 August 12, 2018, I know that AMEEN and SABRI currently reside at 3111 Eastern Avenue, Apartment
16 #26, Sacramento, California, 95821. They reside at SUBJECT RESIDENCE with their four minor
17 children. This is the same address AMEEN listed on his I-485 Application to Adjust Status, filed with
18 United States Citizenship and Immigration Services ("USCIS") on or about November 4, 2015.

19 13. Based on a review of DMV records and recent law enforcement surveillance, I know
20 AMEEN and SABRI currently use multiple vehicles.

21 a) **SUBJECT VEHICLE #1** is a white Toyota Camry, registered to Omar Ameen, 3111 Eastern
22 Avenue, Apt 26, Sacramento 95821, which AMEEN and/or SABRI have been seen driving on
23 approximately eleven occasions between on or about February 21, 2018 and on or about August 8, 2018.
24 I know from a review of law enforcement surveillance that the AMEEN has been observed placing items
25 in the trunk of **SUBJECT VEHICLE #1**; AMEEN and a female wearing a head covering and
26 traditional garb (I believe this female to be SABRI based upon prior observations by surveillance teams
27 of her build, physical appearance, and patterns of behavior) were observed entering this vehicle, both
28 carrying documents in their hands; and AMEEN has been observed using his mobile phone within this

1 vehicle. I know the FBI has also observed a mobile phone sitting on the dashboard of **SUBJECT**
 2 **VEHICLE #1**. AMEEN has also been observed driving this **SUBJECT VEHICLE** to the Wells Fargo
 3 branch where **SUBJECT SAFE DEPOSIT BOX** is believed to be located.

4 b) **SUBJECT VEHICLE #2** is a silver Toyota Highlander which AMEEN and/or SABRI have
 5 been seen occupying on approximately seven occasions between on or about February 27, 2018 and on
 6 or about August 11, 2018.¹ **SUBJECT VEHICLE #2** has been observed by the FBI to be regularly
 7 parked in the vicinity of **SUBJECT RESIDENCE** when not in use. As recently as on or about August
 8 10, 2018, the FBI has observed AMEEN using his mobile phone within **SUBJECT VEHICLE #2**.
 9 Based on law enforcement surveillance, I believe AMEEN is the principal driver of this vehicle, and that
 10 he occupies this vehicle for long periods of time in connection with what I believe to be employment as
 11 a rideshare driver. AMEEN has also been observed driving this **SUBJECT VEHICLE** to the Wells
 12 Fargo branch location where **SUBJECT SAFE DEPOSIT BOX** is believed to be located.

13 c) **SUBJECT VEHICLE #3** is a red Toyota Prius, registered to Omar Ameen, 3111 Eastern
 14 Avenue, Apt 26, Sacramento 95821, which AMEEN has been seen driving on approximately nine
 15 occasions between on or about July 24, 2018 and August 10, 2018. On multiple, recent occasions, the
 16 FBI has observed AMEEN handling papers in or around the **SUBJECT VEHICLE #3**, and on or about
 17 August 10, 2018, a female (I believe this female to be SABRI based upon prior observations by
 18 surveillance teams of her build, physical appearance, and patterns of behavior) placed several objects
 19 into this vehicle, after which AMEEN departed the area of the **SUBJECT RESIDENCE** as the driver of
 20 the vehicle.

21 14. AMEEN is the customer of record for Wells Fargo safe deposit box number 01493. He
 22 has accessed the safe deposit box, located at the Wells Fargo location at 2301 Watt Avenue,
 23 Sacramento, California (**SUBJECT SAFE DEPOSIT BOX**). SABRI is also authorized to accompany
 24 AMEEN to access the box. The safe deposit box was opened in or around December 2017. AMEEN
 25 has been observed on numerous occasions entering the Wells Fargo branch office where this safe
 26 deposit box is maintained.

27
 28 ¹ The Highlander is not registered to AMEEN or SABRI, but to a third party, who is a known
 associate of AMEEN and SABRI, and who lives nearby.

B. Statements on Immigration Documents

15. AMEEN and SABRI have submitted various immigration documents in an effort to gain lawful permanent residence in the United States. I have received and reviewed copies of the documents AMEEN and SABRI submitted in support of their applications.

1. AMEEN's Refugee Application

16. AMEEN, a native and citizen of Iraq, arrived in Turkey in or about April 2012 and began the process of applying for refugee status.

17. On or about February 27, 2014, AMEEN submitted to USCIS Form I-590, Registration for Classification as Refugee; a document that is attested to under oath, in which AMEEN made the following representations:

- a) AMEEN stated that he had never been a member of any organizations.
- b) AMEEN stated that he had never been charged with any violation of law.
- c) AMEEN stated that none of his family members ever had connections to political parties or paramilitary organizations;
- d) AMEEN claimed that his father was "shot dead" because "he accepted to carry portable houses belong[ing] to the Iraqi military." This claim relating to AMEEN's father was one of the bases of AMEEN's claim of a well-founded fear of future persecution.

18. On or about May 22, 2014, AMEEN submitted to USCIS a Sworn Statement of Refugee Applying for Admission into the United States; a document that is sworn under the penalty of perjury, in which AMEEN responded "No," to the following inquiries:

- a) if he had ever been arrested or committed or helped someone else commit any crimes;
- b) if he had ever engaged in, conspired to engage in, or incited any form of terrorist activity;
- c) if he had ever solicited membership or funds for any person or organization that has ever engaged in terrorist activity;
- d) if he had ever provided support, including transportation, communications, funds, documents, weapons or training for any person or organization that has ever engaged in any form of terrorist activity.

19. On or about May 22, 2014, AMEEN was interviewed by an officer with USCIS regarding

his refugee application. As annotated on the interview form filled out by the USCIS officer contemporaneously with the interview AMEEN responded "No," to the following inquiries:

- a) if he had ever interacted with, had involvement with, or knew any members of Al-Qaeda in Iraq or the Islamic State of Iraq;²
- b) if he had ever given food, goods or any service to any armed group or militia;
- c) if he had ever used guns, bombs or any other weapon.

2. AMEEN's Lawful Permanent Residence Application

20. On or about November 4, 2015, AMEEN submitted to USCIS Form I-485, Application to Register Permanent Residence or Adjust Status; a document that is sworn under penalty of perjury.

AMEEN responded "No," to the following inquiries:

- a) if he had ever ordered, called for, committed, assisted, helped with, or otherwise participated in killing any person;
- b) if he had ever been a member of, assisted in, or participated in any group of any kind in which he or others had used any type of weapon against any person;
- c) if he had ever been arrested, charged, or imprisoned for breaking any law;
- d) if he had ever engaged in any form of terrorist activity or ever provided any material support to any person or organization that has engaged in terrorist activity.

21. On or about May 26, 2016, AMEEN was interviewed by an officer with USCIS under oath regarding his Adjustment of Status Application. I have reviewed a transcript of a translation of that interview, and according to my review of the transcript:

- a) AMEEN stated that he had not committed any crime at any time, any where;
- b) AMEEN stated that he had never engaged in any form of terrorist activity;
- c) AMEEN stated that he had not collected funds for any terrorist organization;

² On December 17, 2004, the Department of State designated AQI as a foreign terrorist organization (FTO) and Specially Designated Global Terrorist (SDGT). According to the *United States Department of State Country Reports on Terrorism 2014* and information published by the National Counterterrorism Center, AQI publicly re-named itself the Islamic State in Iraq in October 2006. In April 2013, AQI's leader Abu Bakr al-Baghdadi changed the group's public name to the Islamic State of Iraq and the Levant (ISIL). The Department of State has since amended the FTO designation of AQI to include the aliases ISIL and ISIS.

- d) AMEEN stated that he had not given false testimony to any of his refugee application;
- e) AMEEN stated that he had not had anything to do with killing any person;
- f) AMEEN stated that he had not helped a group use a weapon against any person.

22. As supported by the facts outlined below, there is probable cause to believe that AMEEN's statements and representations to USCIS listed above were materially false.

3. SABRI's Refugee Application

23. On or about May 22, 2014, SABRI submitted to USCIS a Sworn Statement of Refugee Applying for Admission into the United States; a document that is sworn under the penalty of perjury, in which SABRI responded "No," to the following inquiries:

- a) if her spouse ever engaged in terrorist activity or been a member of a terrorist organization;
- b) if she had ever provided support for any person or organization that has ever engaged in any form of terrorist activity.

4. SABRI's Lawful Permanent Residence Application

24. On or about November 4, 2015, SABRI submitted to USCIS Form I-485, Application to Register Permanent Residence or Adjust Status; a document that is sworn under penalty of perjury. SABRI responded "No," to the following inquiry:

- a) if she had through any means ever assisted or provided any type of material support to any person or organization that has ever engaged in any form of terrorist activity.

25. As supported by the facts outlined below, there is probable cause to believe that SABRI's statements and representations to USCIS listed above were materially false.

C. Evidence That the Statements on the Immigration Documents Were False

1. AMEEN's Long-Standing Membership in and Support for AQI and ISIS

26. The FBI has interviewed eight witnesses who identify the AMEEN family as affiliated with AQI and ISIS, to include AMEEN himself, along with his father, brothers and paternal cousins. These eight witnesses are different ages with varying backgrounds, and were interviewed independently by the FBI. The FBI is not aware that any have any criminal convictions.

27. Person 1 is an individual who was interviewed by the FBI, has resided in Rawah, is a

1 former member of the Iraqi military, has personal knowledge of actions taken by AMEEN on behalf of
2 ISIS, and has indicated a fear for his/her safety if his/her identity were to be revealed.

3 28. Person 2 is a retired Iraqi police officer with general knowledge of Omar AMEEN and
4 the Ameen family, and personal knowledge of AMEEN's paternal cousins who participated in terrorist
5 activities on behalf of AQI and ISIS. Person 2 received an immigration benefit for his/her previous
6 work with the United States government, unrelated to the instant case.

7 29. Person 3, at all times relevant, was a member of the Iraqi military with familiarity with
8 the Ameen family, though he/she does not know Omar AMEEN personally.

9 30. Person 4 is an individual with personal knowledge of AMEEN and his family. Person 4
10 has received an immigration benefit from the United States government, as well as relocation expenses,
11 in exchange for his/her providing information regarding AMEEN and his family. Person 4 indicates that
12 he/she has previously worked as a source providing information to the U.S. military, though the FBI has
13 been unable to definitively confirm that history.³

14 31. Person 5 is an individual who was interviewed by the FBI, has resided in Rawah, and has
15 personal knowledge of actions taken by AMEEN on behalf of ISIS.

16 32. Person 6 is an individual who was interviewed by the FBI, has resided in Rawah, is a
17 member of the Iraqi police force, and has general knowledge of AMEEN and his relatives.

18 33. Person 7 is an individual who was interviewed by the FBI, has resided in Rawah, and has
19 general knowledge of the Ameen family.

20 34. Person 8 is an individual who was interviewed by the FBI, has resided in Rawah, and has
21 general knowledge about the Ameen family.

22 **a. Ameen Family Involvement in AQI**

23 35. A number of the witnesses interviewed by the FBI indicated that the Ameen family,
24 particularly patriarch Abdulsattar Ameen, were instrumental in the formation of AQI in Rawah, in the
25 2004 timeframe.

26 _____
27 ³ There are some identified inconsistencies in statements Person 4 has made regarding his/her
28 own personal history, specifically discrepancies between exact dates of certain events. I believe based on
my interactions with and interviews of Person 4 that these discrepancies are based on ordinary failures
of memory and not a lack of credibility.

1 36. Person 3 stated that Abdulsattar Ameen supported the internationally-known terrorist
2 Abu Musab al-Zarqawi in the formation of AQI in Rawah. Person 3 indicated that al-Zarqawi was
3 present in Al-Qa'im, a nearby town and district, in 2005, and that Person 3 has personal knowledge
4 about the activities of AQI in the area in that time.

5 37. Person 4 confirmed the involvement of the Ameen family, including patriarch
6 Abdulsattar Ameen, Omar AMEEN, and all his brothers, in the formation of AQI in Rawah. Person 4
7 elaborated that the Ameen family was one of five native Rawah families that founded AQI in the region.
8 Person 4 stated that Abdulsattar Ameen was one of the first in the region to accept the AQI Arabs, and
9 that Abdulsattar Ameen hosted AQI member meetings at the guesthouse on the family property. Person
10 4 provided background information on the Ameen family, noting that the family owned several homes in
11 a family compound, and that the remaining land was used for agriculture. Person 4 stated that the
12 Ameen family was wealthy, and that the family wealth was used to provide financial support to AQI.

13 38. Person 6 stated that he/she knew Omar AMEEN was a "jihadist."

14 39. Person 2 stated that the entire Ameen family was affiliated with ISIS. Person 2 described
15 AMEEN's father, Abdulsattar Ameen, as a mufti and a jurist for AQI, and an Imam at the mosque in
16 Rawah. Person 2 also characterized the Ameen family as wealthy and stated that they worked in
17 commerce and transportation. Person 2 expanded that the Ameen family was not focused on one type of
18 business, but would do anything to make money, including involvement in auto dealerships.⁴

19 40. Person 7 stated that it is common knowledge among residents in Rawah that Omar
20 AMEEN is a main figure in ISIS, and that he used to be a member of AQI. Person 7 knew AMEEN's
21 house to be an ISIS headquarters for Rawah.

22 41. Person 8 identified residences in Rawah as belonging to the Ameen family. Person 8
23 stated that AMEEN assisted in burying weapons caches on the family land. Person 8 described AMEEN
24 as operating an excavator.

25 42. Person 1 described AMEEN as an ISIS commander. Person 1 explained that prior to

26
27 ⁴ This characterization is consistent with AMEEN's statement on his refugee application that he
28 worked in transportation of petrol across the Jordanian border. AMEEN also stated that transported cars
from the duty free zone. AMEEN's resume from 2018 lists his current employment as being an auto
mechanic in Sacramento.

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1 joining ISIS, AMEEN was a member of Al-Qaeda who fought against Iraqi police and the Americans.

2 **b. AMEEN's Brothers' Participation in Terrorist Activities**

3 43. AMEEN listed on an application submitted to the United Nations High Commissioner for
4 Refugees ("UNHCR") the following relatives: Bilal Abdulsattar Ameen (brother), Huthaifa Abdulsattar
5 Ameen (brother), Suhaib Abdulsattar Ameen (brother), Qutaiba Abdulsattar Ameen (brother), Qusai
6 Abdulsattar Ameen (brother), Udai Abdulsattar Ameen (brother), Luai Abdulsattar Ameen (brother),
7 Mohammed Abdulsattar Ameen (brother), Mustafa Abdulsattar Ameen (brother), and Ayman
8 Abdulsattar Ameen (brother). I know this list of ten brothers to be accurate based on my review of
9 United Nations Oil for Food records and statements provided by multiple independent witnesses.

10 44. Person 3 indicated that Omar AMEEN has eight brothers,⁵ and indicated that he/she
11 knows all of them to have been involved in terrorism and support of AQI since 2004.⁶ Person 3
12 indicated that AMEEN's brother Mustafa was a member of the security detail of Abu Anas al-Samarrai,
13 who was the Wali (leader) of the al-Jazeera district for ISIS. Person 3 indicated that AMEEN's brother
14 Luai Abdulsattar Ameen also worked closely with Abu Anas al-Samarrai.

15 45. Person 4 stated that the Ameen family members were wanted by the Iraqi government
16 and the Americans. Person 4 indicated knowledge about the arrest of AMEEN's brother Bilal.⁷ Person
17 4 also stated that in 2009, U.S. forces sought to locate AMEEN's brother Ayman Abdulsattar Ameen,
18 because Ayman was alleged to be a maker of improvised explosive devices ("IEDs").

19 46. I know from Department of Defense detention records that AMEEN's brother Qutaiba
20 was detained by U.S. forces in or around 2005. Charges against him were eventually dismissed in or
21 around 2006. While in custody, Qutaiba made several admissions that generally corroborate accounts
22

23 ⁵ I know that Omar AMEEN actually has ten brothers, as he accurately listed all ten on his
24 UNHCR documents.

25 ⁶ Person 3 stated that one of the Ameen brothers, Suhaib Abdulsattar Ameen, was not involved
26 in terrorism. But, Suhaib is the subject of an Iraqi arrest warrant for terrorism-related charges, as set
forth elsewhere in this Affidavit.

27 ⁷ Person 4 stated that Bilal was arrested in either 2009, along with Omar AMEEN and his
28 brother Udai Abdulsattar Ameen, or in 2010; documents from the government of Iraq indicate that there
was an arrest warrant for Bilal dated December 26, 2010, and that Bilal was detained since January 22,
2011. A different document from the government of Iraq reflects a November 2012 detention.

given by witnesses to the actions of AMEEN, including the following: Qutaiba admitted that Ghassan Amin is his first cousin, describing him as a Mujahidist. Qutaiba admitted his role in providing support to Ghassan, and stated that sometimes Ghassan would bring a number of mujahidin whom Qutaiba would take to his brother's⁸ house until they were gathered at the end of the day. Qutaiba was taken into custody during a vehicle stop in Rawah in 2005. In his possession were two AK-47 rifles, two 9mm pistols, and an M21 Anti-Tank mine. Qutaiba admitted to owning the weapons, and stated he had planned to toss a medium-sized IED at the home of an Iraqi family in Rawah.

c. AMEEN's Cousins' Participation in Terrorist Activity

47. Person 3 stated that AMEEN's paternal cousins were also involved in terrorism. Person 3 stated that AMEEN's uncle Muhammad has eight sons, including Ghassan Muhammad Amin and Radwan Muhammad Amin, both of who helped to form AQI in Rawah in 2004. Person 3 indicated the involvement of his/her military Division in the arrest of Ghassan and Radwan in 2010, and he/she added that both remain in prison today. I know through my review of United Nations Oil for Food⁹ records and multiple independent witness statements that Person 3 correctly identified all eight of Omar AMEEN's paternal cousins. Person 3 provided additional details about the involvement of each of these paternal cousins in AQI and ISIS.

48. Person 6 stated that he/she knew Ghassan¹⁰ was in charge of a small jihadist circle.

49. Person 2 participated in the investigation of Ghassan, and confirmed that Ghassan is presently incarcerated in Iraq.

50. Person 8 confirmed Ghassan's leadership role, and also his current custodial status.

51. I understand from the statements of witnesses that AMEEN had a close relationship with Ghassan. Person 4 saw Ghassan and Omar AMEEN together every week, sometimes on a daily basis,

⁸ Qutaiba's statement did not specify the name of the brother.

⁹ The Oil-for-Food Programme (OIP) was established by the United Nations in 1995 (under US Security Council Resolution 986). It was established to allow Iraq to sell oil to finance the purchase of humanitarian goods and various mandated United Nations activities concerning Iraq.

¹⁰ I know that Person 6 incorrectly identified Ghassan as Omar AMEEN's brother; based on AMEEN's listing of his relatives and the statements of most of the independent witnesses interviewed, I know Ghassan is actually Omar AMEEN's paternal first cousin.

1 during the time Ghassan was the Wali of Rawah, circa 2004-2005. Person 4 stated that he/she
 2 personally observed Omar AMEEN with Ghassan collecting money for AQI. Person 4 described
 3 Ghassan as typically travelling in a five car convoy of fighters and guards. Person 4 stated that he/she
 4 observed Omar AMEEN acting as a guard for Ghassan in such a convoy on more than one occasion.
 5 Ghassan, Omar AMEEN, and other members of the convoy were armed with shoulder-carried automatic
 6 rifles. Person 4 noted that Omar AMEEN and Ghassan dressed like members of AQI, in Afghan-style
 7 garb with pants cropped above the ankle, long, knee-length shirts, and Afghan hats that make them look
 8 like Taliban. Person 8 described it as normal for Ghassan to seek help from his brothers and paternal
 9 cousins.¹¹

10 **d. AMEEN's Acts in Support of AQI and ISIS**

11 52. Person 3 indicated that Omar AMEEN financed AQI by conducting highway robbery and
 12 kidnapping operations along the highways between Iraq and Jordan. As well, Person 3 stated that Omar
 13 AMEEN led a criminal group that robbed supply trucks and kidnapped drivers. Person 4 stated that
 14 he/she personally observed AMEEN with his father Abdulsattar Ameen, soliciting funds on behalf of the
 15 mujahidin in the marketplace in Rawah.

16 53. Three of the witnesses interviewed indicated AMEEN's involvement with the placement
 17 of IEDs. Person 4 stated that he/she personally witnessed Omar AMEEN involved in planting IEDs on
 18 two occasions; in the end of 2007 or the beginning of 2008, and again in the spring of 2008. Person 7
 19 stated his/her generalized knowledge that AMEEN was known for placing IEDs. Person 5 stated that
 20 he/she personally witnessed AMEEN and two other males planting an IED. Person 5 saw AMEEN
 21

22 ¹¹ One additional witness interviewed by the FBI—a native of Rawah who grew up with Ameen
 23 and was still in contact with him—acknowledged the terrorist attacks committed by Ghassan but denied
 24 Ameen's participation or affinity. Instead, this witness claimed that when Ghassan committed attacks,
 25 Ameen's family had to leave the area. The witness further claimed that Ameen's family was known not
 26 to be like Ghassan. This account is contradicted by the accounts of the other witnesses, including
 27 accounts based on eyewitness observations. As well, Ameen never disclosed his relationship with
 28 Ghassan at any point in the immigration process. Instead, he denied having ever interacted with, having
 any involvement with, or knowing any members of Al-Qaeda in Iraq or the Islamic State of Iraq.

Another additional witness interviewed by the FBI—a relative of Ameen—acknowledged that
 many of his cousins who still live in Rawah “likely” have a radical mindset, but stated that he did not
 have any derogatory information about Ameen himself.

1 standing and keeping watch while the other two males set the IED.

2 54. Person 4 knew of AMEEN's involvement with the mujahidin and weapons. Person 4
3 stated that he/she personally witnessed AMEEN transporting mujahidin fighters in or about 2005.
4 Person 4 described AMEEN's personal vehicle at that time as a Kia Sportage with a cut-out roof and a
5 PKC machine gun mounted on the rear. Person 4 recognized the passengers in the vehicle to be
6 mujahidin fighters because they carried black M-16 style guns, and AMEEN's vehicle carried a black
7 AQI flag and was emblazoned with other AQI signage. Person 1 also described seeing AMEEN walk
8 the streets of Rawah with a slung AK-47 style rifle.

9 55. Two of the witnesses described a connection between AMEEN and specially-designated
10 global terrorist leader Abu Bakr Al-Baghdadi. Person 7 stated that Baghdadi stayed at AMEEN's house.
11 Person 5 described AMEEN as a close associate of Al-Baghdadi. Person 5 recalls seeing AMEEN and
12 Al-Baghdadi together in public in Rawah in the summer of 2014.

13 2. Death of AMEEN's Father

14 56. In support of his refugee claim, AMEEN stated to the UNHCR that in 2010, his father,
15 Abdulsattar Ameen Hussein, was killed due to his cooperation with the American military. AMEEN
16 repeated this claim on his refugee application before USCIS, stating specifically that his father was shot.
17 AMEEN repeated the claim a third time verbally under oath in an interview conducted in conjunction
18 with his application for lawful permanent residence. In actuality, the death certificate for AMEEN's
19 father (which AMEEN did not submit with any of his applications) indicates that AMEEN's father died
20 from natural causes—a cerebral clot—on December 25, 2010.¹² The image below is an English
21 translation of a copy of the death certificate of Abdulsattar Ameen as given to the FBI by a witness who
22 obtained it from an official records maintained at the hospital in Rawah.

23
24
25
26
27
28 ¹² On the death certificate, AMEEN's father's name is written as 'Abd al-Sattar Ameen; this is a transliteration of the Arabic name Abdulsattar Ameen, i.e., the name of Omar AMEEN's father.

Al-Anbar Health Department
Rawah Public Hospital

URGENT Health Ministry
Al-Anbar Health Department
Rawah Public Hospital

(EMERGENCY BRANCH)

Patient Name: 'Abd al-Sattar Ameen Age: 70 Sex: Male Examination Date: 12/25/2010

Chief complaint:

Duration:

H.O.P.I:

Vital signs: PR: BLPR: R.R: TEMP:

Examination: Chest: Heart: Lab. inv: Cerebral clot

Abdomen:

Treatment: Stroke

Examining Physician: [Signature]

Patient's Condition On The Way Out: The patient died on 12/25/2010 at 11 O'Clock.

Director
Rawah Public Hospital

57. Person 4 independently stated that he/she believed AMEEN's father had died of natural causes.¹³ Person 5 also knew that Abdulsattar Ameen died of natural causes, though he/she indicated the cause was a heart attack.

58. AMEEN very likely would have known the true circumstances of his father's death because he stated to USCIS in the interview under oath in support of his application to adjust status that he attended his father's funeral on the family farm. Based on the statements of Person 4, Person 5, and the above death certificate, I believe AMEEN's claim that his father was killed due to his possible

¹³ Person 2 initially stated that Omar AMEEN's father, Abdulsattar Ameen, was killed in 2014, adding that stroke was not the cause of death. Person 2 later clarified that Abdulsattar Ameen died of a brain hemorrhage. Because of the Rawah hospital death certificate and the statements of the other witnesses interviewed by the FBI (all consistent on the natural cause of death of Abdulsattar Ameen), I believe Person 2 was mistaken on the initial claim that Abdulsattar Ameen was killed. Person 2 did state consistently with the other witnesses that Abdulsattar Ameen was a mufti and jurist for AQI, known for his Islamic studies at the mosque in Rawah.

1 assistance to military forces is false.

2 59. Based on my consultation with USCIS, I believe that AMEEN's refugee application was
3 approved in part on the basis of this false claim.

4 60. Furthermore, according to a number of the witnesses interviewed by the FBI, I believe
5 AMEEN's father was in actuality a leading member of AQI in Rawah. By concealing the true nature of
6 his father's membership in AQI, it appears AMEEN misdirected USCIS away from its inquiry into any
7 possible disqualifying ties to terrorism.

8 **3. AMEEN's Participation in a Murder**

9 61. According to USCIS documents, AMEEN departed Iraq for Turkey on or about March
10 31, 2012. On or about September 11, 2013, AMEEN received his UNHCR refugee certificate. On or
11 about February 27, 2014, AMEEN signed the Form I-590 refugee application. On or about May 22,
12 2014, AMEEN was interviewed by a Refugee Officer from USCIS in Istanbul, Turkey.

13 62. At some point after that date, witnesses report that AMEEN returned to Rawah and
14 committed the murder of Ihsan Abdulhafiz Jasim ("Ihsan") in or around late June 2014. AMEEN's
15 passport does not reflect any departures from Turkey after his entry on April 1, 2012. Nevertheless,
16 AMEEN stated during his May 22 refugee interview with USCIS in Turkey that he had returned many
17 times to Iraq.¹⁴ I know from my training and experience that the borders between Iraq, Syria, and
18 Turkey were porous in 2014.

19 63. The eyewitness testimony of three individuals places AMEEN in Rawah at or around the
20 time of Ihsan's killing: Person 5, Person 1, and Person 7.

21 64. Person 5 stated to the FBI that on or about June 26, 2014, which he recalled to be the day
22 Rawah fell to ISIS, Person 5 was with Ihsan at Ihsan's home in Rawah. Person 5 saw three vehicles
23 approach Ihsan's home, including an AMRAP, a 2-cab Hilux, and a Humvee, each carrying multiple
24 males. Person 5 recalls each member of the convoy brandished some type of ISIS paraphernalia,
25

26 ¹⁴ There is no transcript or recording of this May 22 interview, but I have learned from the FBI's
27 consultation with the USCIS official who conducted the interview that AMEEN made a statement to this
28 effect and the interviewer annotated the comment on AMEEN's application form, understanding the
comment to mean AMEEN had returned to Iraq many times between in or around April 2012 and the
date of the USCIS interview.

1 including flags and vests. Person 5 saw AMEEN among the convoy, and watched AMEEN approach
2 Ihsan. Ihsan told Person 5 to leave and get some tools. Person 5 did as Ihsan asked, then subsequently
3 heard gunshots and ran back toward Ihsan. Person 5 heard the men yelling, "Here is your American
4 dog," and saw Ihsan crawling due to gunshots to his left and right arm, chest and leg. Person 5 stated
5 that Ihsan subsequently died. AMEEN approached Person 5 and said, "This is the American dog."
6 Person 5 described AMEEN as having shoulder-length hair, a beard, wearing Afghan garb, and carrying
7 an AK-47.¹⁵ Person 5 correctly identified AMEEN from a series of photos of individuals shown on a
8 smart phone in the presence of an FBI Special Agent.

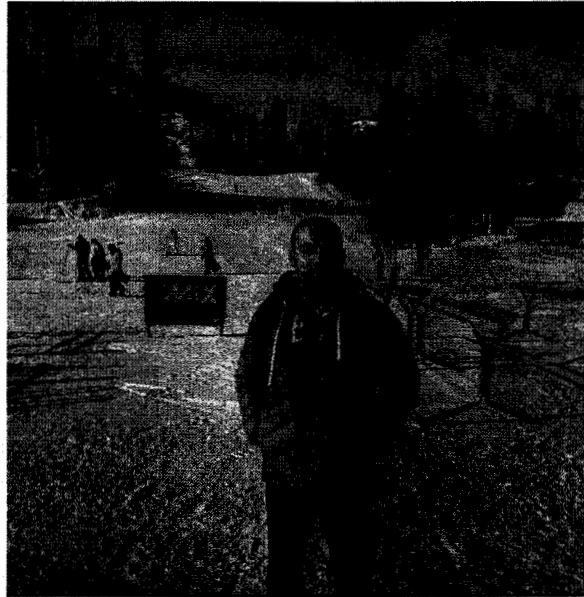
9 65. Person 1 provided an account of his/her observations on the day of the murder, which
10 he/she described as the time Rawah fell to ISIS. Person 1 stated that he/she witnessed a three-vehicle
11 ISIS convoy pass by where he/she was standing. He/she described the convoy as made up of three
12 trucks—two tan in color and one white. Person 1 stated that all of the vehicles had ISIS paraphernalia
13 on them, including ISIS flags. At least one of the tan trucks had a larger weapon mounted on it. Person
14 1 added that each vehicle had three or more men in it who were armed with rifles and dressed in ISIS
15 style clothes. Person 1 identified AMEEN as riding in the passenger seat of the white vehicle, wearing a
16 black shemagh (a traditional Middle Eastern headdress); Person 1 stated that AMEEN was likely the
17 commander of the convoy. Person 1 observed the convoy continue on to the area of Ihsan's house.
18 Person 1 then heard a burst of rifle fire. Person 1 later learned through conversations with family
19 members that AMEEN had killed Ihsan with that burst of rifle fire.

20 66. Person 7, a resident of Rawah, stated to the FBI that he/she recalled seeing AMEEN
21 before the fall of Rawah.

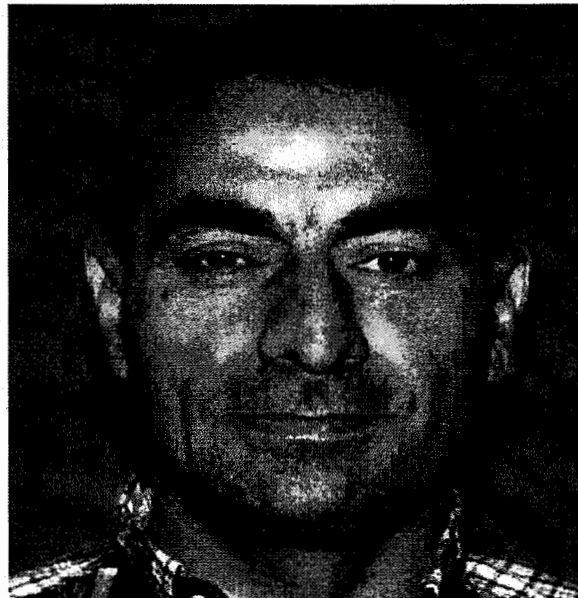
22 67. Person 5 identified AMEEN positively from this photo, which I know to be a photograph
23
24

25 ¹⁵ Person 5 gave a subsequent statement under oath to Iraqi authorities on the events of the
26 murder. In this statement, Person 5 describes seeing an exchange of gunfire between Ihsan and the
27 members of the convoy. Person 5 also states that he/she witnessed AMEEN shoot Ihsan. As part of this
28 sworn statement, Person 5 positively identified AMEEN from a photograph, which I recognize to be an
image of AMEEN on a mountain road taken from a social media account registered to AMEEN. In that
sworn statement, Person 5 indicated that the date of the murder was June 22, 2014, but still linked the
date to the fall of Rawah to ISIS.

1 obtained from a social media account that appears to be registered to AMEEN:¹⁶



12
13 68. Person 1 identified AMEEN positively from this photo, which I know to be AMEEN's
14 driver's license photo based on a review of California DMV records:



25 **4. Warrants in Iraq**

26 69. The Iraqi government has communicated the existence of at least four warrants for the
27

28 ¹⁶ Person 4 also independently positively identified AMEEN from this photo.

1 arrest of Omar AMEEN:

- 2 (1) a warrant dated December 26, 2010, issued by the Republic of Iraq, Higher Judicial Court
3 of Investigation, Central Investigative Court in Al-Karkh, Counterterrorism Services,
4 charging AMEEN, along with his brothers Ayman Abdulsattar Ameen, Bilal Abdulsattar
5 Ameen, and Suhaib Abdulsattar Ameen, with violation of Article 4/1 of the
6 Counterterrorism Law;
- 7 (2) a warrant dated October 16, 2011, issued by the Republic of Iraq, Higher Judicial Court
8 of Investigation, Central Investigative Court in Al-Karkh, Counterterrorism Service,
9 charging AMEEN and his brother Ayman Abdulsattar Ameen, and his cousins Adnan
10 Mohammad Ameen and Muhannad Mohammad Ameen, and two other individuals with
11 violation of Iraqi Penal Code 406[1]/A, Murder;
- 12 (3) a warrant dated December 24, 2017, issued by the Chiefship of the Federal Appellate
13 Court of al-Anbar, Hit Inquiry Court, charging AMEEN with violation of Article 4/1 of
14 the Counterterrorism Law; and
- 15 (4) a warrant dated May 16, 2018, issued by the Al-Karkh Inquiry Court, charging AMEEN
16 with violation of Article 406(1), for the murder of Ihsan Abdulhafiz Jasim.¹⁷

17 **5. SABRI's Knowledge of AMEEN's Terrorist Activities**

18 70. SABRI married AMEEN on or about November 14, 2002, according to paperwork she

19
20 ¹⁷ In addition to these outstanding warrants, according to a document provided to the FBI from
21 an individual with access to such records, in or about June 2008, AMEEN was detained. According to
22 this document, AMEEN was in the custody of an Iraqi Army infantry brigade. The infantry brigade sent
23 another document communicating to the Rawah Police Department a request for further information
24 about AMEEN. The FBI interviewed an individual who was formerly the commander of the 28th
25 Brigade, 7th Division, Iraqi Army—the unit that is identified on the first document. This individual
26 indicated that he/she was familiar with AMEEN. This individual was shown both of the documents, and
27 recognized them, stating that original copies of these documents would be located at the battalion
28 headquarters, which had been burned down by ISIS in approximately 2014. This individual left his/her
post approximately three months before the date on these documents, and therefore was not the
commander of the military unit at the time these documents were drafted. He/she provided the name of
his/her successor to the FBI. The FBI is in possession of a written statement by this successor, stating
that the first document is a forgery, and that the signature on the document is not his. Because of these
contradictory statements about the authenticity of the detention documentation, it is unknowable at this
time the circumstances of AMEEN's detention by the infantry brigade, whether he was in fact detained
by the infantry brigade, and if he was, when and how he was able to secure his release from detention.

1 submitted to USCIS. According to both SABRI and AMEEN's immigration paperwork, they have
2 resided together since that date.

3 71. I learned from interviews with witnesses in this investigation that AMEEN and SABRI
4 resided in Rawah on the Ameen family properties, where many of AMEEN's brothers and their families,
5 as well as his father, also resided.

6 72. I understand from witness interviews in this investigation, as well as study of literature
7 and articles about Iraq, that a tribal culture was prominent in Rawah, and that residents of Rawah were
8 generally aware of each other's tribal and familial affiliations. While publicly-available population
9 estimates for Rawah vary between approximately 13,000 to 20,000, with fluctuations due to the violence
10 in the region, the estimated population the population of Rawah in 2012 was approximately 19,600
11 people—roughly the size of Dixon, California. I know that witnesses interviewed in this investigation
12 described AMEEN as coming from a prominent family in Rawah. For example, Person 4 characterized
13 the Ameen family as one of the five native families in Rawah responsible for the founding of AQI in the
14 region. Person 7 stated that it is common knowledge amongst residents in Rawah that AMEEN is a
15 main figure of ISIS in Rawah. Person 1 described AMEEN as an ISIS commander, and explained that
16 prior to joining ISIS, AMEEN was a member of AQI and fought against Iraqi police and the Americans.
17 Two different witnesses—Person 7 and Person 5—stated that Abu Bakr Al-Baghdadi, a well-known
18 terrorist and ISIS leader, was seen with AMEEN and even stayed at his house.

19 73. Based on my training and experience, I believe it is highly likely that a wife of a member
20 of AQI or ISIS, married for more than 10 years at the time the representations were made on the
21 immigration documents, living in the same household as her spouse in a region where AQI was active,
22 would be aware of that spouse's participation in terrorist activities. I have learned that similarly situated
23 individuals (i.e., wives of terrorist operatives) often view it as their duty to support their terrorist
24 husbands. I have learned that Ayman al-Zawahiri's wife, Omaisma Hassan, released a statement on
25 behalf of Al-Qaeda that encouraged "Muslim sisters" to assist with jihad, but only in suitable feminine
26 ways. She called supporting jihad "an obligations for all Muslims, men and women." Hassan went on
27 to say, "Our main role – that I ask God accept from us – is to preserve the mujahideen in their sons, and
28 homes, and their confidentiality, and to help them raise/develop their children in the best way."

1 74. As well, based on my training and experience, I believe the wife of a member of a
2 prominent AQI- and ISIS-affiliated family, living in the same small town where these family members
3 were terrorist operatives, would have been aware of at least some of the terrorist activities of these
4 family members. For example, many of the witnesses interviewed in this investigation describe Ghassan
5 as a notorious leader of AQI in Rawah; witnesses also describe a close relationship between Ghassan
6 and AMEEN. As the wife of AMEEN, I believe SABRI would have known both of her husband's close
7 relationship with Ghassan and of Ghassan's terrorist activities.

8 75. I know that some of Ghassan's sisters married AMEEN's brothers, and some of
9 AMEEN's sisters married into Ghassan's family; thus the extended family SABRI would have been
10 surrounded by and interacted with on the family properties included many AQI- and, later, ISIS-
11 affiliated family members, in addition to AMEEN himself.

12 76. I understand from a review of a Facebook page dedicated to news from and about the
13 town of Rawah that AMEEN's own notoriety is so well-known among the residents that there was a post
14 in February 2018 discussing AMEEN's residence in the United States and debating his ISIS affiliation.
15 This social media posting is an example of that notoriety, consistent with the concept expressed by
16 witnesses in this investigation that AMEEN's affiliation with AQI and ISIS was widely known in the
17 town. As a resident of that town and a co-habitant on the Ameen family properties, I believe it is very
18 likely that SABRI would have also known about AMEEN's terrorist affiliation.

19 77. In my training and experience, female supporters of terrorist organizations and female
20 family members of terrorists support terrorists in a variety of ways, including maintaining telephonic
21 communication with family members overseas and acting as a conduit of information between members
22 of the organization. I have also learned that women have served as logisticians for terrorist groups,
23 including AQI, and that some terrorist groups have relied on cultural norms prohibiting contact between
24 unrelated men and women in order to employ women as successful couriers or concealers of information
25 or other materiel. From my training and experience, I understand that wives typically carry
26 responsibility for domestic duties, including cooking and cleaning. I understand from consultation with
27 the Assistant U.S. Attorney, as well as with USCIS, that such domestic activities can constitute support
28 for terrorists. As the wife of AMEEN, I believe SABRI would have known that any domestic help she

1 gave her husband would in turn have the effect of promoting, sustaining, or maintaining AQI and ISIS,
2 even if only to a de minimis degree.

3 78. Based on my review of toll records of an account associated with SABRI's cellular
4 telephone number, I know that SABRI has maintained communications with several overseas phone
5 numbers since in or about November 2016 and continuing through at least in or about April 2017, using
6 an encrypted platform.

7 **D. The Statements on the Immigration Documents Were Material**

8 79. I believe the foregoing establishes probable cause to believe that AMEEN and SABRI
9 made material misrepresentations on their I-590 and I-485 applications to USCIS, as well as on the
10 accompanying documents and interviews. There is probable cause to believe that:

- 11 a) AMEEN was a member of a terrorist organization, and misrepresented this fact on his
12 immigration documents;
- 13 b) AMEEN had been charged with a violation of law, and, to the extent he was aware of the
14 2010 and 2011 warrants, misrepresented this fact on his immigration documents;
- 15 c) AMEEN's family members—specifically his brothers, cousins, and father—had
16 connections to paramilitary organizations; AMEEN misrepresented this fact on his
17 immigration documents;
- 18 d) AMEEN's father died of natural causes; AMEEN falsely stated that his father was killed
19 to support his false refugee claim;
- 20 e) AMEEN had committed crimes, and misrepresented this fact on his immigration
21 documents;
- 22 f) AMEEN had solicited funds for a terrorist organization, and misrepresented this fact on
23 his immigration documents;
- 24 g) AMEEN provided support to an organization and to people who engage in terrorism, and
25 misrepresented this fact on his immigration documents;
- 26 h) AMEEN called for, helped with, or committed the killing of a person, and misrepresented
27 this fact on his immigration documents;
- 28 i) AMEEN was a member of a group in which he used a weapon against a person, and

misrepresented this fact on his immigration documents;

j) AMEEN gave false testimony on his refugee application, and misrepresented this fact in his lawful permanent residence application;

k) SABRI provided support to AMEEN, an individual who engaged in terrorist activity, and she misrepresented this fact on her immigration documents;

l) SABRI knew her husband was involved in terrorist activity, and she misrepresented this fact on her immigration documents.

80. Based on my training and experience as well as discussions with USCIS and Homeland Security Investigations (HSI) personnel, I believe that AMEEN and SABRI's statements were material to the determination by USCIS of their admissibility to the United States. By answering these questions in the manner they did, I believe that AMEEN and SABRI cut off a line of inquiry to questions relevant to their admissibility to the United States. I understand that USCIS would have asked additional questions and the applications may have been subjected to further process. I understand from USCIS that if AMEEN and SABRI admitted to supporting terrorist activities or a terrorist group, they may have been denied admission to the United States.

V. LOCATION OF EVIDENCE AND NEED TO SEARCH COMPUTERS

81. Based on my training and experience, as well as my knowledge about this investigation and others, I know that items relating to participation in terrorist organizations, including stored communications, correspondence, photographs, travel documents, and financial documents are often kept in residences, storage units, safe deposit boxes, computers, phones, digital devices, and sometimes in vehicles or on a person.

82. I also know that individuals who support terrorism/terrorists and who try to conceal that support from law enforcement use a variety of computers, including cellular telephones, to access the internet and to communicate electronically with others. I know that such individuals often keep computers and cellular telephones in their residences, on their person and/or in their vehicles so that they can easily access the internet and communicate electronically from various locations. In my experience, such individuals also use social media platforms, email, and other messaging services either on their computers or through mobile applications on their cellular telephones to communicate with like-minded

1 persons, to solicit membership or funds on behalf of terrorist groups or organizations, to communicate
2 with persons from whom they seek assistance or to whom they provide assistance (financial, logistical,
3 or otherwise), to communicate their intent to travel, or possibly to report on their own travel abroad to
4 support terrorists/terrorism. Similarly, these individuals may communicate electronically on computers
5 to discuss with supporters how they intend to conceal information if law enforcement should detect their
6 intent or completed travel abroad to support terrorism/terrorists. I know that at times such individuals
7 who support terrorism view terrorist propaganda online using their computers. Likewise, these
8 individuals access the internet to search for maps, news on regions of conflict, issues related to
9 immigration, passports, and travel visas, and to view information related to other supporters of
10 extremism and members of terrorist groups.

11 83. Based on my training and experience, I use the following technical terms to convey the
12 following meanings:

- 13 a) Internet: The Internet is a global network of computers and other electronic devices that
14 communicate with each other. Due to the structure of the Internet, connections between
15 devices on the Internet often cross state and international borders, even when the devices
16 communicating with each other are in the same state.
- 17 b) Storage medium: A storage medium is any physical object upon which computer data
18 can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-
19 ROMs, and other magnetic or optical media.
- 20 c) As used in this affidavit, the terms "records" and "information" includes all forms of
21 creation or storage, including any form of computer or electronic storage (such as hard
22 disks or other media that can store data); any handmade form (such as writing); any
23 mechanical form (such as printing or typing); and any photographic form (such as
24 microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or
25 photocopies).
- 26 d) The term "computer" includes all types of electronic, magnetic, optical, electrochemical,
27 or other high-speed data processing devices performing logical, arithmetic, or storage
28

1 functions, including desktop computers, notebook or laptop computers, mobile phones,
2 tablets, server computers, and network hardware.

3 84. As described above and in Attachment B, this application seeks permission to search for
4 records and information that might be found in or on the locations described in Attachments A-1 through
5 A-7, in whatever form they are found. One form in which the records might be found is data stored on a
6 computer or other storage media. Thus, the warrant applied for would authorize the seizure of electronic
7 storage media or, potentially, the copying of electronically stored information, all under Rule
8 41(e)(2)(B).

9 85. *Probable cause.* I submit that if a computer or storage medium is found on or in any of
10 the specified locations, there is probable cause to believe those records or information will be stored on
11 that computer or storage medium, for at least the following reasons:

- 12 a. Based on my knowledge, training, and experience, I know that computer files or
13 remnants of such files can be recovered months or even years after they have been
14 downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files
15 downloaded to a storage medium can be stored for years at little or no cost. Even when
16 files have been deleted, they can be recovered months or years later using forensic tools.
17 This is so because when a person “deletes” a file on a computer, the data contained in the
18 file does not actually disappear; rather, that data remains on the storage medium until it is
19 overwritten by new data.
- 20 b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack
21 space—that is, in space on the storage medium that is not currently being used by an
22 active file—for long periods of time before they are overwritten. In addition, a
23 computer’s operating system may also keep a record of deleted data in a “swap” or
24 “recovery” file.
- 25 c. Wholly apart from user-generated files, computer storage media—in particular,
26 computers’ internal hard drives—contain electronic evidence of how a computer has been
27
28

1 used, what it has been used for, and who has used it. To give a few examples, this
2 forensic evidence can take the form of operating system configurations, artifacts from
3 operating system or application operation, file system data structures, and virtual memory
4 “swap” or paging files. Computer users typically do not erase or delete this evidence,
5 because special software is typically required for that task. However, it is technically
6 possible to delete this information.

- 7
8 d. Similarly, files that have been viewed via the Internet are sometimes automatically
9 downloaded into a temporary Internet directory or “cache.”

10 86. *Forensic evidence.* As further described in Attachment B, this application seeks
11 permission to locate not only computer files that might serve as direct evidence of the crimes described
12 on the warrant, but also for forensic electronic evidence that establishes how computers were used, the
13 purpose of their use, who used them, and when. There is probable cause to believe that this forensic
14 electronic evidence will be on any computer or storage medium in or on the locations specified in
15 Attachments A-1 through A-7 because:

- 16 a. Data on a computer or storage medium can provide evidence of a file that was once on
17 the computer or storage medium but has since been deleted or edited, or of a deleted
18 portion of a file (such as a paragraph that has been deleted from a word processing file).
19 Virtual memory paging systems can leave traces of information on the computer or
20 storage medium that show what tasks and processes were recently active. Web browsers,
21 e-mail programs, and chat programs store configuration information on the computer or
22 storage medium that can reveal information such as online nicknames and passwords.
23 Operating systems can record additional information, such as the attachment of
24 peripherals, the attachment of USB flash storage devices or other external storage media,
25 and the times the computer was in use. Computer file systems can record information
26 about the dates files were created and the sequence in which they were created, although
27 this information can later be falsified.
28

b. As explained herein, information stored within a computer and other electronic storage media may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, information stored within a computer or storage media (e.g., registry information, communications, images and movies, transactional information, records of session times and durations, internet history, and anti-virus, spyware, and malware detection programs) can indicate who has used or controlled the computer or storage media. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. The existence or absence of anti-virus, spyware, and malware detection programs may indicate whether the computer was remotely accessed, thus inculcating or exculpating the computer owner. Further, computer and storage media activity can indicate how and when the computer or storage media was accessed or used. For example, as described herein, computers typically contains information that log: computer user account session times and durations, computer activity associated with user accounts, electronic storage media that connected with the computer, and the IP addresses through which the computer accessed networks and the internet. Such information allows investigators to understand the chronological context of computer or electronic storage media access, use, and events relating to the crime under investigation. Additionally, some information stored within a computer or electronic storage media may provide crucial evidence relating to the physical location of other evidence and the suspect. For example, images stored on a computer may both show a particular location and have geolocation information incorporated into its file data. Such file data typically also contains information indicating when the file or image was created. The existence of such image files, along with external device connection logs, may also indicate the presence of additional electronic storage media (e.g., a digital camera or cellular phone with an incorporated camera). The geographic and timeline information described herein may either inculcate or exculpate the computer user. Last,

1 information stored within a computer may provide relevant insight into the computer
2 user's state of mind as it relates to the offense under investigation. For example,
3 information within the computer may indicate the owner's motive and intent to commit a
4 crime (e.g., internet searches indicating criminal planning), or consciousness of guilt
5 (e.g., running a "wiping" program to destroy evidence on the computer or password
6 protecting/encrypting such evidence in an effort to conceal it from law enforcement).

- 7
- 8 c. A person with appropriate familiarity with how a computer works can, after examining
9 this forensic evidence in its proper context, draw conclusions about how computers were
10 used, the purpose of their use, who used them, and when.
- 11
- 12 d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of
13 forensic evidence on a storage medium that are necessary to draw an accurate conclusion
14 is a dynamic process. While it is possible to specify in advance the records to be sought,
15 computer evidence is not always data that can be merely reviewed by a review team and
16 passed along to investigators. Whether data stored on a computer is evidence may
17 depend on other information stored on the computer and the application of knowledge
18 about how a computer behaves. Therefore, contextual information necessary to
19 understand other evidence also falls within the scope of the warrant.
- 20
- 21 e. Further, in finding evidence of how a computer was used, the purpose of its use, who
22 used it, and when, sometimes it is necessary to establish that a particular thing is not
23 present on a computer or storage medium. For example, the presence or absence of
24 counter-forensic programs or anti-virus programs (and associated data) may be relevant
25 to establishing the user's intent.

26 87. *Necessity of seizing or copying entire computers or storage media.* In most cases, a
27 thorough search of a premises for information that might be stored on a computer or storage media often
28 requires the seizure of the physical computer or storage media and later off-site review consistent with
the warrant. In lieu of removing a computer or storage media from the premises, it is sometimes

1 possible to make an image copy of a computer or storage media. Generally speaking, imaging is the
2 taking of a complete electronic picture of the computer's data, including all hidden sectors and deleted
3 files. Either seizure or imaging is often necessary to ensure the accuracy and completeness of data
4 recorded on the computer or storage media, and to prevent the loss of the data either from accidental or
5 intentional destruction. This is true because of the following:

- 6 a. The time required for an examination. As noted above, not all evidence takes the form of
7 documents and files that can be easily viewed on site. Analyzing evidence of how a
8 computer has been used, what it has been used for, and who has used it requires
9 considerable time, and taking that much time on premises could be unreasonable. As
10 explained above, because the warrant calls for forensic electronic evidence, it is
11 exceedingly likely that it will be necessary to thoroughly examine any computer or
12 storage media to obtain evidence. Computers and storage media can store a large volume
13 of information. Reviewing that information for things described in the warrant can take
14 weeks or months, depending on the volume of data stored, and would be impractical and
15 invasive to attempt on-site.
- 16 b. Technical requirements. Computers can be configured in several different ways,
17 featuring a variety of different operating systems, application software, and
18 configurations. Therefore, searching them sometimes requires tools or knowledge that
19 might not be present on the search site. The vast array of computer hardware and
20 software available makes it difficult to know before a search what tools or knowledge
21 will be required to analyze the system and its data on the Premises. However, taking the
22 computer or storage media off-site and reviewing it in a controlled environment will
23 allow its examination with the proper tools and knowledge.
- 24 c. Variety of forms of electronic media. Records sought under this warrant could be stored
25 in a variety of storage media formats that may require off-site reviewing with specialized
26 forensic tools.
27
28

d. In addition, some of the information found on computers or storage media in this case may be in a foreign language, for example, Arabic. If so, it will take more time to conduct the search because the reviewing law enforcement personnel will need to consult with a linguist.

88. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit seizing, imaging, or otherwise copying computers and storage media that may contain some or all of the evidence described in the warrant, and would authorize a later review of the media or information consistent with the warrant. The later review may require techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of a hard drive to human inspection in order to determine whether it is evidence described by the warrant.

89. Because at least two people share the location specified at Attachment A-1 as a residence, it is possible that location will contain storage media that are predominantly used, and perhaps owned, by persons who are not suspected of a crime. If it is nonetheless determined that that it is possible that the things described in this warrant could be found on any of those computers or storage media, the warrant applied for would permit the seizure and review of those items as well.

VI. EVIDENCE OF THE VIOLATION OF 18 U.S.C. § 1546 IS EXPECTED TO BE FOUND AT LOCATIONS DESCRIBED IN ATTACHMENTS A-1 THROUGH A-7

90. As set forth above, I submit that there is probable cause to believe that AMEEN and SABRI have violated 18 U.S.C. § 1546 by making false statements in immigration documents relating to AMEEN's involvement in terrorist organizations, his commission of criminal and/or violent acts, and his association with others who are members of or associated with terrorist organizations. I am seeking this warrant for authorization to search for evidence of those alleged crimes, specifically, evidence that relates to AMEEN's criminal past, his involvement and association with terrorist organizations, and SABRI's knowledge of the same. I believe, based on my training and experience, that evidence of current, ongoing membership in, affinity for, or communication with members of terrorist organizations tends to be indicative of past membership in, affinity for, or communication with members of terrorist organizations. I submit that there is probable cause to believe that such evidence, as well as other

evidence relevant to establishing the above violations of § 1546, will be found in the following locations:

A. SUBJECTS

91. I know from my training and experience that individuals often carry some of the items listed in Attachment B on their person, including cell phones and other small computers, keys, forms of personal identification, and/or debit, credit, or membership cards. I submit there is probable cause to believe that evidence in these items will be found on the person of AMEEN and SABRI.

B. SUBJECT RESIDENCE

92. I know from my training and experience that individuals often keep items listed in Attachment B in their homes, in either physical or digital form, specifically:

a) Evidence relating to AMEEN and SABRI's interactions with international and United States immigration related processes (including the seeking of refugee status), including records, documents, and other materials pertaining to the refugee resettlement process, UNHCR, USCIS, or US immigration procedures;

b) Evidence tending to identify AMEEN's and SABRI's family members and associates as terrorist operatives or members of terrorist organizations, including photographs, address books, telephone numbers, and contacts or friends lists;

c) Evidence establishing AMEEN's and SABRI's past or ongoing involvement in and association with terrorist organizations and/or individuals involved in terrorist activities, including journals, calendars, and diaries;

d) Evidence that may show past or ongoing financial support going to or coming from terrorist-related organizations, entities and/or individuals, including AMEEN and SABRI's account statements, ledgers, debit cards, credit cards, pay stubs, and use of any entities to transfer money. I know from my training and experience that members of foreign terrorist organizations often receive funding from the foreign terrorist organization or its members in order to carry out their duties. Financial records showing unexplained deposits of cash can be further evidence of ties to and support of a foreign terrorist organization;

e) Evidence of border crossings or travel to or within Iraq or other ISIS-controlled regions,

1 including any passports, travel receipts, tickets, reservations, and schedules. I know from a review of
2 AMEEN's interview with USCIS in connection with his I-485 application that he indicated that he may
3 have an additional passport that he has never presented to U.S. immigration authorities;

4 f) Records, documents, and other materials pertaining to Iraq, Syria, or Turkey, issued by Iraq,
5 Syria, or Turkey, or pertaining to official government action taken by Iraq, Syria, or Turkey related to
6 AMEEN, SABRI, or their family members;

7 g) Communications to or from AMEEN or SABRI that relate to the past or ongoing provision of
8 money, goods, personnel, or services to individuals outside the United States; terrorist, insurgent, or
9 military-like activities; violent acts; individuals or groups who have committed or intend to commit
10 violent acts;

11 h) Records, documents, and other materials pertaining to any designated foreign terrorist
12 organization, terrorist group, or terrorist, including but not limited to Al-Qaeda in Iraq or the Islamic
13 State of Iraq and ash-Sham;

14 i) Records, documents, and other materials pertaining to Islamic extremism or violent jihad;

15 j) Records, documents, and other and materials pertaining to murder; attacks on Iraqi police,
16 security, or military forces, U.S. military forces, or Coalition Forces personnel; martyrdom or suicide;
17 improvised explosive devices or other weapons;

18 k) Records, documents, and other materials, including keys, showing ownership, control, use, or
19 possession of the SUBJECT RESIDENCE, SUBJECT VEHICLES or the SUBJECT SAFE DEPOSIT
20 BOX; and

21 l) Records, documents, and other materials, including keys, showing ownership, control, use, or
22 possession of storage units or facilities, other safe deposit boxes, or other locations which may
23 reasonably contain evidence related to the aforementioned violations of 18 U.S.C. § 1546.

24 **C. SUBJECT VEHICLES**

25 93. I know from my training and experience that individuals often carry some of the items
26 listed in Attachment B in their vehicles, including cell phones and other small computers, keys, forms of
27 personal identification, and/or debit, credit or membership cards and documentation. Because AMEEN
28 has been observed driving at least one of the SUBJECT VEHICLES to the Wells Fargo bank where

1 SUBJECT SAFE DEPOSIT BOX is located, I believe financial documentation or other records may be
2 found in the SUBJECT VEHICLES. Similarly, because AMEEN and SABRI have been observed with
3 various documents inside their vehicles, I believe documents may be found in the SUBJECT
4 VEHICLES that may be relevant to the offense conduct as outlined herein.

5 **D. SUBJECT SAFE DEPOSIT BOX**

6 94. I know from my training and experience that individuals often keep personally valuable
7 items listed in Attachment B in safe deposit boxes, in either physical or digital form, including
8 passports, official records, ledgers, and family keepsakes. I know from my review of AMEEN's
9 interview with USCIS in connection with his I-485 application that he indicated that he may have an
10 additional passport that he has never presented to U.S. immigration authorities.


11 95. Therefore, I respectfully request that this Court issue search warrants for the SUBJECTS,
12 the SUBJECT RESIDENCE, the SUBJECT VEHICLES, and the SUBJECT SAFE DEPOSIT BOX
13 particularly described in Attachments A-1 through A-7 that authorize the seizure of the items described
14 above and in Attachment B which is attached hereto and incorporated by reference herein.

15 **VII. SEALING REQUEST**

16 96. I further request that the Court seal the search warrant, the affidavit, and the application
17 in support thereof, except that copies of the warrant in full or redacted form may be maintained by the
18 United States Attorney's Office and may be served on Special Agents and other investigative and law
19 enforcement officers of the Federal Bureau of Investigation, federally deputized state and local law
20 enforcement officers, and other government and contract personnel acting under the supervision of such
21 investigative or law enforcement officers, as necessary to effectuate the warrant. These documents
22 pertain to and discuss an ongoing criminal investigation that is neither public nor known to all the
23 targets of the investigation at this time. Accordingly, there is good cause to seal these documents
24 because their premature disclosure may seriously jeopardize the investigation. Sealing these documents
25 will also better ensure the safety of agents and others.
26
27
28

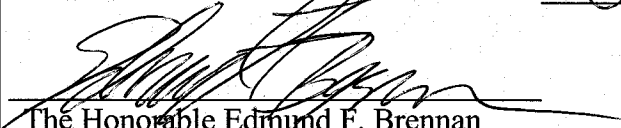
1 I declare, under the penalty of perjury that the foregoing is true and correct, to the best of my
2 knowledge, information, and belief.

3
4 Respectfully submitted,

5 
6 Elizabeth Buckmiller
7 Special Agent
8 Federal Bureau of Investigation

9 Subscribed and sworn to before me on:

8-14-2018

10 
11 The Honorable Edmund F. Brennan
12 UNITED STATES MAGISTRATE JUDGE

13
14 
15
16 Approved as to form by AUSA Audrey B. Hemesath

ATTACHMENT A-1

SUBJECT RESIDENCE is an apartment located at 3111 Eastern Avenue, Apartment #26, Sacramento, California 95821, located within a gated, multi-unit apartment complex. Captioned apartment complex is called "Eastern Villa Apartments." A sign along Eastern Avenue, in front of the apartment complex, bears the words "3121 Eastern Villa Apartments." The building is two stories and light grey in color. There is a driveway running down the length of the center of the apartment complex, with a single, gated vehicle entrance. Apartment #26 is located on the second floor of building 3111, which houses units 23 through 26. Building 3111 is the building on the southeast corner of the complex, the first building encountered on the left side of the entrance gate when facing the complex from Eastern Avenue. The door to Apartment #26 is dark blue in color and labeled with the number "26" on a placard adjacent to the door. According to publicly available information, the residences in this complex are primarily two-bedroom apartments.



ATTACHMENT B

1. All records and information relating to violations of 18 U.S.C. § 1546 (Document Fraud), involving Omar Abdulsattar AMEEN or Khansaa Rashid SABRI, regarding the following:
 - a. communications sent, received, or accessed by AMEEN or SABRI that relate to the provision of money, goods, personnel, or services to individuals outside the U.S. involved in terrorist, insurgent, or paramilitary activities; or any individuals or groups who have committed or intend to commit violent acts;
 - b. family members and associates of AMEEN and SABRI who were involved with or have had connections to terrorist organizations, including photographs, address books, telephone numbers, and contacts or friends lists;
 - c. activities of AMEEN and SABRI, including journals, calendars, and diaries;
 - d. financial activities of AMEEN and SABRI, including account statements, ledgers, debit cards, credit cards, pay stubs, and use of any entities that can be used to transfer money;
 - e. travel, including any passports, travel receipts, tickets, reservations, and schedules;
 - f. Iraq, Syria, or Turkey or any official government actions taken by Iraq, Syria, or Turkey related to AMEEN, SABRI, or their family members;
 - g. any foreign terrorist organization, terrorist group, or terrorist, including but not limited to Al-Qaeda in Iraq or the Islamic State of Iraq and ash-Sham;
 - h. Islamic extremism or violent jihad;
 - i. the refugee resettlement process, UNHCR, USCIS, or US immigration procedures;
 - j. murder; attacks on Iraqi police, security, or military forces, U.S. military forces, or Coalition forces; martyrdom or suicide; improvised explosive devices or other weapons;
2.
 - k. bank accounts of AMEEN and SABRI, sources of funds, disposition or recipient of funds from these accounts, bank records and statements, payment slips, checks, and any other financial records relating to AMEEN or SABRI; All records, documents, photographs, applications, items, keys, and materials demonstrating ownership, control, use, occupancy, or possession of the SUBJECT RESIDENCE, SUBJECT VEHICLES or the SUBJECT SAFE DEPOSIT BOX (as described more fully in Attachments A-1 to A-5);

3. All records, documents, photographs, applications, items, keys, and materials demonstrating ownership, control, use, or possession of storage units or facilities, other safe deposit boxes, or other locations which may reasonably contain evidence related to violations of 18 U.S.C. § 1546; and
4. All computers (as defined below).
5. For any computer or storage medium whose seizure is otherwise authorized by this warrant, and any computer or storage medium that contains or in which is stored records or information that is otherwise called for by this warrant:
 - a. evidence of who used, owned, or controlled the device at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, e-mail, e-mail contacts, chat and messaging logs, photographs, and correspondence;
 - b. evidence of the presence or absence of software that would allow others to control the device, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;
 - c. evidence of the attachment of other devices;
 - d. evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the device;
 - e. evidence of the times the device was used;
 - f. passwords, encryption keys, and other access devices that may be necessary to access the device;
 - g. applications, utility programs, compilers, interpreters, or other software, as well as documentation and manuals, that may be necessary to access the device or to conduct a forensic examination of it;
 - h. records of or information about Internet Protocol addresses used by the device;
 - i. evidence indicating the computer user's state of mind as it relates to the crime under investigation; and
 - j. records of or information about the device's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

6. As used above, the terms “records” and “information” includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disks or other media that can store data); any handmade form (such as writing); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).

The term “computer” includes all types of electronic, magnetic, optical, electrochemical, or other high-speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, notebook and laptop computers, mobile phones, tablets, server computers, and network hardware.

The term “storage medium” includes any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

- a. Any computer or storage media referenced above that is found in the course of the search may be digitally imaged at the scene of the search, and a copy of that digital image retained for further forensic examination. Alternatively, if a digital image of the computer or storage media is not possible at during the execution of the search warrant, any computer seized may be retained for later forensic examination

SEALED

UNITED STATES DISTRICT COURT

for the
Eastern District of California

In the Matter of the Search of

3111 EASTERN AVENUE, APARTMENT #26,
SACRAMENTO, CA, 95821

Case No. **2:18-SW 0668 EFB -1**

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Eastern District of California
(identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A-1, attached hereto and incorporated by reference.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

SEE ATTACHMENT B, attached hereto and incorporated by reference.

YOU ARE COMMANDED to execute this warrant on or before 8-28-2018 (not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

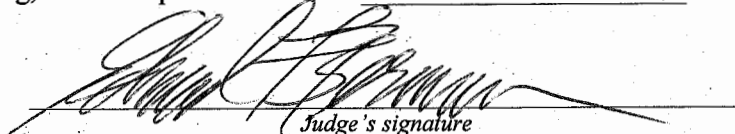
The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to: any authorized U.S. Magistrate Judge in the Eastern District of California.

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .

Date and time issued: 8-14-2018
at 10:40 A.M.

City and state: Sacramento, California


(Judge's signature)

Edmund F. Brennan, U.S. Magistrate Judge
Printed name and title

Return

Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I swear that this inventory is a true and detailed account of the person or property taken by me on the warrant.

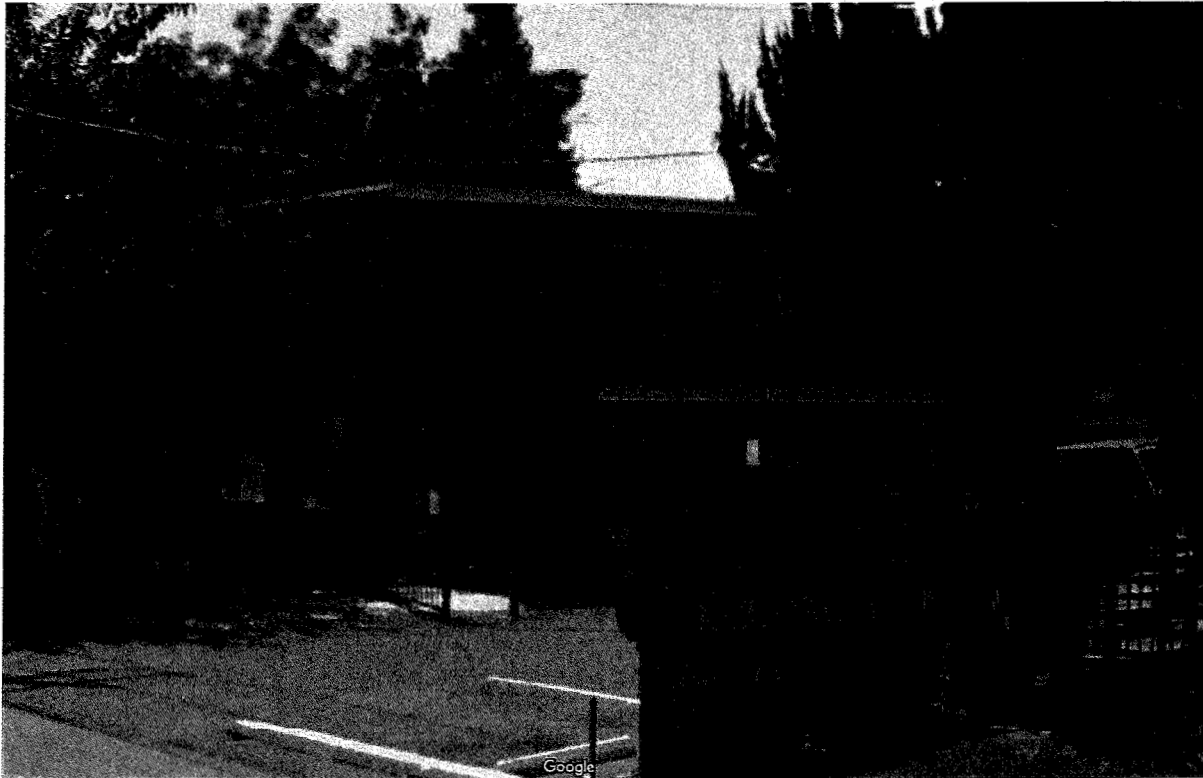
Subscribed, sworn to, and returned before me this date.

Signature of Judge

Date

ATTACHMENT A-1

SUBJECT RESIDENCE is an apartment located at 3111 Eastern Avenue, Apartment #26, Sacramento, California 95821, located within a gated, multi-unit apartment complex. Captioned apartment complex is called "Eastern Villa Apartments." A sign along Eastern Avenue, in front of the apartment complex, bears the words "3121 Eastern Villa Apartments." The building is two stories and light grey in color. There is a driveway running down the length of the center of the apartment complex, with a single, gated vehicle entrance. Apartment #26 is located on the second floor of building 3111, which houses units 23 through 26. Building 3111 is the building on the southeast corner of the complex, the first building encountered on the left side of the entrance gate when facing the complex from Eastern Avenue. The door to Apartment #26 is dark blue in color and labeled with the number "26" on a placard adjacent to the door. According to publicly available information, the residences in this complex are primarily two-bedroom apartments.



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 - b. family members and associates of AMEEN and SABRI who were involved with or have had connections to terrorist organizations, including photographs, address books, telephone numbers, and contacts or friends lists;
 - c. activities of AMEEN and SABRI, including journals, calendars, and diaries;
 - d. financial activities of AMEEN and SABRI, including account statements, ledgers, debit cards, credit cards, pay stubs, and use of any entities that can be used to transfer money;
 - e. travel, including any passports, travel receipts, tickets, reservations, and schedules;
 - f. Iraq, Syria, or Turkey or any official government actions taken by Iraq, Syria, or Turkey related to AMEEN, SABRI, or their family members;
 - g. any foreign terrorist organization, terrorist group, or terrorist, including but not limited to Al-Qaeda in Iraq or the Islamic State of Iraq and ash-Sham;
 - h. Islamic extremism or violent jihad;
 - i. the refugee resettlement process, UNHCR, USCIS, or US immigration procedures;
 - j. murder; attacks on Iraqi police, security, or military forces, U.S. military forces, or Coalition forces; martyrdom or suicide; improvised explosive devices or other weapons;
2. k. bank accounts of AMEEN and SABRI, sources of funds, disposition or recipient of funds from these accounts, bank records and statements, payment slips, checks, and any other financial records relating to AMEEN or SABRI; All records, documents, photographs, applications, items, keys, and materials demonstrating ownership, control, use, occupancy, or possession of the SUBJECT RESIDENCE, SUBJECT VEHICLES or the SUBJECT SAFE DEPOSIT BOX (as described more fully in Attachments A-1 to A-5);

3. All records, documents, photographs, applications, items, keys, and materials demonstrating ownership, control, use, or possession of storage units or facilities, other safe deposit boxes, or other locations which may reasonably contain evidence related to violations of 18 U.S.C. § 1546; and
4. All computers (as defined below).
5. For any computer or storage medium whose seizure is otherwise authorized by this warrant, and any computer or storage medium that contains or in which is stored records or information that is otherwise called for by this warrant:
 - a. evidence of who used, owned, or controlled the device at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, e-mail, e-mail contacts, chat and messaging logs, photographs, and correspondence;
 - b. evidence of the presence or absence of software that would allow others to control the device, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;
 - c. evidence of the attachment of other devices;
 - d. evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the device;
 - e. evidence of the times the device was used;
 - f. passwords, encryption keys, and other access devices that may be necessary to access the device;
 - g. applications, utility programs, compilers, interpreters, or other software, as well as documentation and manuals, that may be necessary to access the device or to conduct a forensic examination of it;
 - h. records of or information about Internet Protocol addresses used by the device;
 - i. evidence indicating the computer user's state of mind as it relates to the crime under investigation; and
 - j. records of or information about the device's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

6. As used above, the terms “records” and “information” includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disks or other media that can store data); any handmade form (such as writing); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).

The term “computer” includes all types of electronic, magnetic, optical, electrochemical, or other high-speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, notebook and laptop computers, mobile phones, tablets, server computers, and network hardware.

The term “storage medium” includes any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

- a. Any computer or storage media referenced above that is found in the course of the search may be digitally imaged at the scene of the search, and a copy of that digital image retained for further forensic examination. Alternatively, if a digital image of the computer or storage media is not possible at during the execution of the search warrant, any computer seized may be retained for later forensic examination