

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

United States of America
v.

MUSTAFA MOUSAB ALLOWEMER

Defendant(s)

Case No.

Magistrate No. 19-1380

[UNDER SEAL]

CRIMINAL COMPLAINT

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

On or about the date(s) of April 2019 through the present in the county of Allegheny in the Western District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2339B(a)(1) (Count 1)
(On or about April 2019 through the present)

Attempting to provide material support and resources, to wit, services and personnel, to a designated Foreign Terrorist Organization (ISIS)

18 U.S.C. § 842(p)(2)(B) (Counts 2 and 3)
(On or about May 24 and May 26, 2019)

Distribution of information relating to explosives, destructive devices, and weapons of mass destruction to a person knowing such person intended to use the information for and in furtherance of a federal crime of violence, to wit, 18 U.S.C. § 2332a(a)(2) (Weapons of Mass Destruction)

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Nicholas Edquist (handwritten signature)

Complainant's signature

FBI Special Agent Nicholas Edquist

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/18/2019

Cynthia Reed Eddy (handwritten signature)

Judge's signature

City and state: Pittsburgh, Pennsylvania

CYNTHIA REED EDDY, Chief U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

MUSTAFA MOUSAB ALLOWEMER

Magistrate No. 19-1380

[UNDER SEAL]

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Nicholas Edquist, being duly sworn, hereby depose and state the following:

Introduction

1. This affidavit is made in support of a criminal complaint alleging that MUSTAFA MOUSAB ALLOWEMER (“ALLOWEMER”) has violated Title 18, United States Code, Section 2339B(a)(1) (providing, attempting, or conspiring to provide material support or resources¹ to wit, provision of services and personnel, in the form of himself, to a designated Foreign Terrorist Organization (“FTO”), namely the Islamic State of Iraq and al-Sham) (Count 1). It is further alleged that ALLOWEMER has violated Title 18, United States Code, Section 842(p)(2)(B) (distribution of information relating to explosives, destructive devices, and weapons of mass destruction), in that ALLOWEMER distributed two documents containing information relating to explosives, destructive devices, and weapons of mass destruction to a person, knowing that such person intended to use the information for and in furtherance of a federal crime of violence (Counts 2 and 3). Title 18, United States Code, Section 2332a(a)(2) makes it a federal crime to use, threaten, or attempt to use a weapon of mass destruction² against any person or property within the United States.

¹ “Material support or resources” means any property, tangible or intangible, or service ... weapons, lethal substances, explosives, personnel (one or more individuals who may be or include oneself), and transportation, except medicine or religious materials. 18 U.S.C. § 2332A(b)(1).

² The term “weapon of mass destruction” means, among other things: (A) any destructive device as defined under federal law; (B) any weapon that is designed or intended to cause death or serious bodily injury through the release, dissemination, or impact of toxic or poisonous chemicals, or other precursors. 18 U.S.C. § 2332a(c)(2)(A) and (B).

2. I have served as a Federal Bureau of Investigation (“FBI”) Special Agent since 2018 and have been employed by the FBI since 2016. As a Special Agent with the FBI, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

3. I am currently assigned to the Joint Terrorism Task Force (“JTTF”) in the FBI’s Pittsburgh Division. In this capacity, I am charged with investigating possible violations of federal criminal law. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including functioning as a case agent on international terrorism investigations. I have received training and have gained experience in the conduct of counterterrorism investigations, the execution of federal search warrants and seizures, and the identification and collection of computer-related evidence.

4. The facts set forth in this affidavit are based on my personal knowledge, the knowledge obtained during my participation in this investigation, the knowledge obtained from other individuals, including other law enforcement personnel, review of documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

5. In this investigation, both English and Arabic were spoken and written. As a result, at various points in the affidavit, I cite English translations of portions of communications,

documents, and conversations that were conducted in Arabic. These translations were made by one or more Arabic translators employed by the FBI. Although FBI personnel have attempted to transcribe and, where necessary, translate the communications, documents, and conversations accurately, to the extent that quotations from these communications are included, these are preliminary, not final, transcriptions and translations.

6. In addition, at various points in the affidavit, I may offer interpretations of certain communications using brackets and footnotes. These interpretations, which include translations of certain words and phrases in the Arabic language, are based on my knowledge of the investigation to date and review of prior communications, the contents and context of the communications, prior and subsequent communications, conversations with other law enforcement officers and agents, conversations with one or more Arabic translators employed by the FBI, and my experience and familiarity with FTOs, generally.

Information about the Islamic State of Iraq and al-Sham

7. On or about October 15, 2004, the United States Secretary of State designated Jam'at al Tawhid wa'al-Jihad (popularly known as "al-Qaeda in Iraq" ("AQI")) as an FTO under Section 219 of the Immigration and Nationality Act ("INA") and as a Specially Designated Global Terrorist ("SDGT") entity under Section 1(b) of Executive Order 13224.

8. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a SDGT entity under Section 1(b) of Executive Order 13224 to add the alias the Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary of State also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham ("ISIS," which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria ("ISIS"), ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and

Al-Furqan Establishment for Media Production. On or about September 21, 2015, the Secretary of State added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

9. Based on training and experience, I am aware that ISIS has pursued the objective of an Islamic state, or caliphate, based in the Middle East and Africa that encompasses all Muslims worldwide. ISIS has pursued this objective through, among other means, killing and deliberate targeting of civilians; mass executions; persecution of individuals and communities on the basis of their religion, nationality, or ethnicity; kidnapping of civilians; forced displacement of Shia Muslim communities and minorities; killing and maiming of children; rape; and other forms of sexual violence. ISIS has recruited thousands of foreign fighters from across the globe to assist with its efforts to expand its so-called caliphate in Iraq, Syria, and other locations in the Middle East and elsewhere. ISIS has also leveraged technology to spread its violent extremist ideology and for the purpose of inciting adherents to commit terrorist acts.

10. Based on training and experience, I am aware that: (a) tens of thousands of Sunni extremists and others have traveled to Syria and Iraq to join ISIS, and they commonly enter Syria by crossing the border from Turkey; (b) Abu Bakr al-Baghdadi is the current leader of ISIS and is frequently referred to as “Khalifa” or “Khalifa Abu Bakr al-Baghdadi”; (c) the terms “dowlah,” “dawlah,” “dowla,” and “dawla” are Arabic terms that mean country or state and are commonly used to refer to ISIS, which is also known as the “State;” and (d) ISIS is associated with a flag on a black background and white letters, written in Arabic on the top, translated as “There is no God but Allah.” In the middle of the flag is a white circle containing black Arabic lettering translated as “Mohammed is the Messenger of Allah.” This flag is also commonly known as the “Black Banner” or the “Black Standard.”

Facts Establishing Probable Cause

A. Summary of Investigation

11. The FBI Pittsburgh JTTF investigation of MUSTAFA MOUSAB ALLOWEMER has revealed that ALLOWEMER plotted to bomb the Legacy International Worship Center, a church located at 2131 Wilson Avenue on the North Side of Pittsburgh, Pennsylvania (the “Church”), using a weapon of mass destruction (i.e. an explosive device). According to ALLOWEMER, his motivation to detonate a device at the Church was to support the cause of ISIS and to inspire other ISIS sympathizers in the United States to join together and commit similar acts in the name of ISIS. ALLOWEMER also targeted the Church, which he described as Christian and Nigerian, in order to “take revenge for our [ISIS] brothers in Nigeria.” ALLOWEMER was aware that numerous people in or around the Church could be killed by the explosion.

12. In furtherance of the plot to bomb the Church, ALLOWEMER distributed, in or around May 2019, multiple Arabic-language instructional guides and documents related to the construction and use of explosives and improvised explosive devices (“IEDs”) to an individual ALLOWEMER believed to be a fellow ISIS supporter, but who was in fact an FBI employee. ALLOWEMER distributed these documents with the intent that the information be used in the assembly of a destructive device (weapon of mass destruction) and in furtherance of conducting an attack in support of ISIS. In or around June 2019, ALLOWEMER purchased several items with the belief that they were necessary to assemble a destructive device and with the intention that they be used to construct the explosives that would be detonated in the vicinity of the Church. Among the items ALLOWEMER purchased were acetone (in the form of nail polish remover), 9-volt batteries, ice packs, and nails.

B. Background

13. According to information provided to the FBI by the Department of Homeland Security, ALOWEMER was born on or about June 5, 1998, in Daraa, Syria, and is a citizen and national of Syria. ALOWEMER initially entered the United States via John F. Kennedy International Airport in New York on or about August 1, 2016, as a refugee. ALOWEMER subsequently resettled in the City of Pittsburgh, where he currently resides. ALOWEMER is a recent graduate of a Pittsburgh public high school. ALOWEMER does not currently possess a U.S. passport and is not a legal permanent resident of the United States.

14. ALOWEMER's online activity has demonstrated his substantial consumption and approval of ISIS propaganda, aspirations to join ISIS, and a desire to commit acts of violence in the name of ISIS. In or around April 2018, the FBI identified a social networking account with display name "Mustafa Alowemer" as likely belonging to ALOWEMER. Notably, the "Intro" section of the social networking account included a phrase in Arabic text that an FBI linguist translated as "hoping to Allah that he dies in a way that does not require the traditional funeral cleansing and burial rituals." This same FBI linguist interpreted this statement to mean that ALOWEMER wanted to die by being blown up, which would render traditional Islamic funeral rituals unnecessary or impossible.

15. The FBI investigation also revealed that, in or around April and May 2018, ALOWEMER communicated with multiple social networking accounts attributable to Person 1 who is herself a pledged supporter of ISIS. Among other things, Person 1 was alleged to have used hacked social networking accounts to collect and distribute information on how to make explosives and biological weapons. Earlier this year Person 1 pleaded guilty in federal court in the Eastern

District of Wisconsin to attempting to provide material support to an FTO (i.e., ISIS), in violation of Title 18, United States Code, Section 2339B(a)(1).

C. Communications with FBI OCE

16. Beginning in or around March 2019, ALLOWEMER utilized multiple social networking and mobile messaging applications to communicate with an FBI online covert employee (“OCE”), whom ALLOWEMER believed to be a fellow ISIS supporter, or “brother,” based outside of the United States. In the course of his communications with the OCE, ALLOWEMER expressed his desire to undertake “nafir”³ in support of ISIS and asked the OCE to explore possibilities to enable him to do so. In addition, ALLOWEMER regularly distributed ISIS propaganda materials, offered to provide information about potential attack targets in the Pittsburgh area in support of ISIS, requested to be provided with a weapon with a silencer, and pledged “bay’aa,”⁴ or an oath of allegiance, to the leader of ISIS, Abu Bakr al-Baghdadi, through a video recording of himself. Some representative statements made by ALLOWEMER to the OCE from on or about March 9, 2019, to on or about April 12, 2019, are detailed below. All communications were conducted in Arabic and translated by the OCE.

March 9, 2019: *Indeed, I ask Allah to relief [sic] us and grant us Nafir.*

March 13, 2019: *If I want to do Nafir to Turkey and then to Syria or Iraq, do you know someone who can help me?*

March 16, 2019: *Brother, you said you were going to talk to the brothers there about [me] joining [them], what happened? By Allah my brother, I'm burning from inside for what happened to the Muslims in New Zealand.*⁵

³ Based on training and experience, I am aware that “nafir” is a term used by ISIS members and adherents that means answering the call for jihad or traveling to conduct jihad.

⁴ Based on training and experience, I am aware that an official pledge of “bay’aa” is viewed by ISIS members and supporters as a demonstration of commitment to the cause of ISIS and of loyalty to its leader.

⁵ According to public sources, on or about March 15, 2019, two mosques in Christchurch, New Zealand were targeted by a gunman, resulting in more than 50 fatalities.

- April 3, 2019: *I don't know my brother, but I'm still [planning] on pledging allegiance, Allah willing.*
- April 4, 2019: *My brother, I want you to tell the brothers here that the Yazidis,⁶ the enemies of Allah, have big celebrations and that they are here in big numbers; if there are any plans to avenge our brothers in Baghuz [Translator's Note: city in Syria], then I can provide the brothers with their [Yazidis] locations, if they [the brothers] want that.*
- April 6, 2019: *I was raised in Jordan on loving the Jihad and the Mujahdeen [sic]. I met some Jordanian brothers, some of which did the Nafir in Raqqah, and I, alongside some brothers, were [sic] arrested three times in Jordan, because I was one of the supporters.*
- April 10, 2019: *My brother, I suggest that they drop the device [Affiant's Note: reference to a cellular telephone] at a safe place and I go get it. Can I make the Bay'aa while masked?*
- April 10, 2019: *Brother, I will do whatever they [brothers] think is safer for them. And I want you to tell them if they can secure me a weapon with a silencer for if I have the opportunity/chance, to hunt Allah's enemies in the forest.*
- April 12, 2019: *Brother, I will send you the [Bay'aa] video and you save it because I want to delete it from my device.*
- April 12, 2019: *[ALOWEMER sent a Bay'aa video and then deleted it after [the OCE] confirmed receiving and saving it]. Did you get it?*

17. Based upon ALOWEMER's expressed desire to meet other ISIS members and adherents in person and in the United States, and to engage in acts in support of ISIS in the United States, the OCE provided a means for ALOWEMER to communicate directly with an FBI Undercover Employee ("UCE") and an FBI Confidential Human Source ("CHS").

D. Communications and Meetings with FBI UCE and CHS

18. On or about April 13, 2019, ALOWEMER and the UCE established contact online and have since communicated, via multiple encrypted mobile messaging applications, on a near-

⁶ Based on training and experience, I am aware that Yazidis are an ethnic Kurdish minority native to Turkey, Iraq, and Syria. Yazidi populations in the Middle East and elsewhere have been frequent targets of violent actions, including murder, slavery, and rape, by Sunni Muslim FTOs such as ISIS because of their religious beliefs and practices.

daily basis using a mixture of Arabic and English. During their initial conversations, the UCE represented to ALLOWEMER that the UCE was an ISIS “brother” living in another state in the United States. Among other topics of conversation in the communications on or about April 13, 2019, ALLOWEMER confirmed that he had previously sent a video proclaiming his allegiance to the leader of ISIS, Abu Bakr al-Baghdadi, expressed his desire to support the cause of ISIS through his own abilities, and offered to provide information on local Kurdish Yazidi families if ISIS “brothers” wanted to seek revenge for “our brothers from al-Baghuz.”⁷ ALLOWEMER communicated that he was excited to meet the UCE and referred to him as a brother from the “Caliphate soldiers.” ALLOWEMER also asked if he could be provided with a secure device to communicate with the UCE and other “brothers” to alleviate concerns about perceived electronic surveillance.

19. On or about April 16, 2019, ALLOWEMER and the UCE met in the Pittsburgh area for approximately three and one-half hours. The UCE also brought to the meeting the CHS,⁸ who was described by the UCE as a fellow ISIS “brother.” In the course of the meeting, ALLOWEMER, the UCE, and the CHS discussed opportunities to participate together in a violent attack in the United States in support of ISIS. Furthermore, ALLOWEMER identified possible attack targets, including the aforementioned Yazidis and Shia Muslims, whom ALLOWEMER denigrates as apostates, as well as an individual with United States military affiliation. In a discussion about targeting a Shia mosque for a violent attack, ALLOWEMER engaged in the following exchange with the UCE:⁹

⁷ According to public sources, Al-Baghuz is a town located in Eastern Syria. A reasonable interpretation of this statement is that ALLOWEMER is referring to a battle between Kurdish-led Syrian forces, assisted by the United States, and ISIS fighters in or around February and March 2019. ISIS fighters were defeated and lost control of the only remaining territory that they controlled in Eastern Syria.

⁸ A second CHS was also present at this meeting, but took no active role and did not communicate with ALLOWEMER.

⁹ In-person communications among ALLOWEMER, the UCE, and the CHS were conducted using a mix of English and Arabic. The Arabic portions have been subject to preliminary translation by FBI linguists.

ALLOWEMER: *That is OK. Like, uh we can put bombs in here, like in the bag? And I can go there, and I can leave the bag inside, the –*

UCE: *Oh, yeah! So –*

ALLOWEMER: *– we just control the bag from like far away.*

UCE: *– so like a bomb inside the bag?*

ALLOWEMER: *Yeah – that is safe.*

UCE: *The question is how heavy you want that. The heavier the bag is, the bigger the bomb.*

ALLOWEMER: *We just want to destroy it all.*

20. In addition to possible targeting of the local Yazidi population and a Shia mosque,

ALLOWEMER also discussed targeting a single U.S. soldier for a violent attack:

ALLOWEMER: *I stated that I can provide information, but I don't want to cause any harm to come to my family, because they are quite tired and weary. I can, if, honestly, you can secure for me some weapons. I can ... I can hunt the enemy of Allah! Like ...*

UCE: *Yeah.*

ALLOWEMER: *Like uh, like several. Like uh ... Two weeks ago, I seen a ... One of the American military ...*

UCE: *Yeah. Oh really?*

ALLOWEMER: *Yeah. In the forest. He was alone. I can kill him, but I ...*

UCE: *Why? Or ...*

ALLOWEMER: *He was in the military.*

UCE: *Oh!*

ALLOWEMER: *He killed our sisters in Baghuz and in Iraq.*

UCE: *Yeah. Oh, yeah, yeah.*

ALLOWEMER: *Why should we stay quiet?*

UCE: *Yeah.*

ALOWEMER: *You can do something – why don't we?*

21. Based upon ALOWEMER's aforementioned request for a new device for secure communications, the UCE and the CHS provided him with a pre-paid cellular telephone¹⁰ during the meeting on or about April 16, 2019. At the conclusion of the meeting, ALOWEMER suggested, as part of their next meeting, that he drive the UCE and the CHS around the Pittsburgh area to show them some of the potential attack targets they had discussed. Following the meeting, ALOWEMER and the UCE engaged in daily online communications using multiple encrypted mobile messaging applications. On or about April 20, 2019, ALOWEMER sent the UCE a self-authored Arabic "nasheed"¹¹ entitled, "The Longing for Martyrdom" that appeared to be addressed to Abu Bakr al-Baghdadi, the leader of ISIS. An FBI linguist translated ALOWEMER's "nasheed" as follows:

The Longing for Martyrdom
The best news is when you call get ready for jihad.
Fight the enemy. O soldiers of Baghdadi.
I miss the people but do not know why.
I am waiting for paradise.
The love of martyrdom has inhabited my heart.
The land of jihad is what I wish for.
I wait for the taste of martyrdom.
I am focused on defeating the enemy.
Defeating the Shi'tes astounded me.
I long for the promise of Allah.
He promised me paradise.
He motivated me for martyrdom.
With worship he enlightened me.
O Baghdadi your soldiers are your swords in battle.
We are the letters [of your name] against your enemies.
I long for the land of the Caliphate.
I am expecting to raise the banner.
I will spill my blood for the victory of my religion.

¹⁰ ALOWEMER has maintained this cellular telephone since receiving it and has used it to conduct ongoing communications with the UCE, the CHS, and the OCE.

¹¹ Based on training and experience, I am aware that "nasheed" is an Arabic word meaning chant or poem. "Nasheeds" are popular in the Islamic world, including among members and supporters of FTOs such as ISIS, and are often incorporated into extremist propaganda videos.

22. On or about April 25, 2019, ALLOWEMER, the UCE, and the CHS met in-person for a second time in the Pittsburgh area for approximately two hours. In addressing the potential attack targets the group had discussed at the first meeting, ALLOWEMER explained that the aforementioned Shia mosque was, in fact, not a suitable target. Among ALLOWEMER's concerns were the fact that the mosque had a "code" on the door, was affixed with security video cameras, and was located close to a police station. ALLOWEMER also explained that he had discovered that Sunni Muslims also worshipped at the mosque, further indicating that it was not an appropriate attack target. In the course of the meeting, ALLOWEMER affirmed his desire to participate in an attack on American soil and to subsequently escape to Syria, where he ultimately wants to die as a martyr. ALLOWEMER discussed a potential attack method with the UCE and the CHS as follows:

ALLOWEMER: *When we have a goal, we can leave a book bag or something.*

UCE: *Leave it or ...*

ALLOWEMER: *We can leave it.*

UCE: *Leave it, yes.*

ALLOWEMER: *And ... Like we blow it up from someplace.*

ALLOWEMER: *I am looking for a way to leave.*

UCE: *Ah! Right, right.*

CHS: *Yeah.*

ALLOWEMER: *I don't want to get caught, get caught.*

UCE: *Yeah, yeah. To make it look, uh – like go in and make it look normal – and leave with no one ever noticing, right?*

CHS: Yeah.

ALOWEMER: So I was thinking about it, like we, we drive 2 cars –

UCE: Okay.

ALOWEMER: Block the plate ...

UCE: Oh, the plates, yeah, block off the plates. Yeah.

ALOWEMER: – And you park the other car in the – the middle of the woods –

UCE: Okay.

ALOWEMER: – The other car we put the ... book bag or anything –

UCE: Uh-huh.

ALOWEMER: – And we leave ... the other car and we ride the other car and we just switch cars.

23. In the weeks following the meeting on or about April 25, 2019, ALOWEMER and the UCE engaged in daily online communications, which included ALOWEMER sending the UCE a significant amount of ISIS propaganda. For example, on or about May 1, 2019, ALOWEMER sent to the UCE what appeared to be an ISIS propaganda video that depicted a large truck bomb being detonated by a militant on a roof top. In the video, which appeared to be filmed in the Middle East, the explosion destroyed several multi-story buildings in an urban area. Also in the course of communications, ALOWEMER made multiple references to having some “ideas” and a new “plan,” and he and the UCE engaged in coded conversation about the construction and use of explosives.

24. From my review of the online communications and discussions with the UCE and the CHS, it is apparent that ALOWEMER believed the UCE to have expertise in constructing destructive devices and explosives, based in part on representations made by the UCE. I am further aware that ALOWEMER and the UCE often used variants of the terms “cooking,” “food,” “spice,”

and “meal” to refer to explosives. In one such exchange on or about May 20, 2019, ALLOWEMER asked the UCE whether he can “cook” a “meal” with a timer. The UCE used similarly coded language to ask whether the “cooking” will end at a specific time. ALLOWEMER responded that it will be a good “meal,” but they will have to try it before-hand. Similarly, on or about May 21, 2019, ALLOWEMER sent the following message to the UCE in English: “There are a couple studies [Affiant’s Note: interpreted to mean “students”] who work with the military if they are going to collage [*sic*] with me we might start hunting brother and feed them :).” The UCE eventually responded in English, “They can taste our cooking,” to which ALLOWEMER replied in English, “Yes, they can taste it and I’m positive they will love it.”

25. On or about May 24, 2019, through a mobile messaging application, ALLOWEMER sent the UCE two Arabic-language instructional documents that appeared to relate to explosives, entitled, “Beginners Course for Young Mujahedeen” and “The Extraction of Potassium Nitrate from Goat Manure and Other Methods.” On or about May 26, 2019, ALLOWEMER sent the UCE another Arabic-language instructional document entitled, “Manufacturing the Easiest Explosive Device.” The document entitled, “Beginners Course for Young Mujahedeen” contains nearly 30 pages of instructions related to jihad, military operations, organizational protocols, and explosives. It also purports to provide step-by-step instructions to manufacture explosives, toxins, poisons, and IEDs, including “TNT,” “Molotov Cocktails,” “Popular Landmines/IEDs,” “Sodium Bomb,” “Black Gunpowder,” and “Ammonium Nitrate 2.”

26. In or around June 2019, examiners from the FBI Laboratory provided professional opinions regarding the bomb-making instructions distributed by ALLOWEMER. Specifically, “Beginners Course for Young Mujahedeen” and “Manufacturing the Easiest Explosive Device” contain numerous guidelines related to explosives production, incendiary materials, and explosives

or incendiary device construction. Both documents contain information on the construction of IEDs or improvised incendiary devices (“IIDs”), also known as homemade bombs or destructive devices.

27. On or about June 2, 2019, ALLOWEMER and the UCE met for a third time in the Pittsburgh area for approximately three hours. Near the start of the meeting, ALLOWEMER provided the UCE with two rings bearing the ISIS insignia, intended for the UCE and the CHS to keep as gifts from ALLOWEMER. In the course of the meeting, ALLOWEMER communicated what he described as a “mushrikeen”¹² and “Nigerian” church as his new target for conducting a violent attack. In articulating his idea, ALLOWEMER expressed the hope that destroying the Church with explosives in the name of ISIS would inspire other ISIS “brothers” in the United States to join together and take similar actions. Furthermore, in the following exchange with the UCE, ALLOWEMER explicitly tied his support for ISIS to his rationale for wanting to target Nigerians in particular:

ALLOWEMER: *All of them are Mushrikeen [Polytheist Christians].*

UCE: *Oh yeah! Polytheist and infidels.*

ALLOWEMER: *And the – uh, this house is still for the ones who go to church because they are Nigerians ...*

UCE: *Yeah. So, why the Nigerians? All of them are polytheists.*

ALLOWEMER: *They are all polytheists. We, we, take revenge for our brothers in Nigeria.*

UCE: *There is an Islamic State or there was an Islamic State in Nigeria.*

ALLOWEMER: *Of course there is.*

28. At the meeting on or about June 2, 2019, ALLOWEMER outlined in detail his plan

¹² Based on training and experience, I am aware that “mushrikeen” is an Arabic word that describes those who commit “shirk,” or the sin of practicing polytheism or idolatry, and is typically used in a derogatory manner to describe Christians.

for the CHS, the UCE, and himself to place an explosive device at the Church and detonate it with a delayed timer. ALLOWEMER described his plan for using two cars and coordinating the placement and intended movements of the CHS, the UCE, and himself during the operation. Under ALLOWEMER's plan, after being dropped off by the UCE on a nearby street, ALLOWEMER would approach the Church on foot with a backpack full of explosives and place the backpack on one side of the Church. Upon placing the backpack at the Church, ALLOWEMER would return to the UCE's vehicle and depart with the UCE, after which ALLOWEMER, the UCE, and the CHS, who would be in a separate vehicle conducting surveillance in the vicinity of a nearby police station prior to and during the operation, would meet at a pre-determined mosque in the Pittsburgh area so that they would have witnesses to their presence at morning prayers. According to ALLOWEMER, the timer would be set to go off approximately ten minutes after placing the backpack so they would be close enough to hear the explosion as they made their way to the mosque. After ALLOWEMER provided an initial description of his proposed plot, he expressed the idea of incorporating a second device in the attack, as indicated in the following exchange with the UCE:

ALLOWEMER: *And ah after two hours, three hours when the police ... want to come*

UCE: *Yeah.*

ALLOWEMER: *– We're going to keep another one right next to the –*

UCE: *Okay.*

ALLOWEMER: *– To the place of the operation –*

UCE: *Uh huh.*

ALLOWEMER: *– And then when they're all come together, we –*

ALOWEMER: *So they're scared to step.*

UCE: *Right, right!*

ALOWEMER: *So they can't ...*

UCE: *So now we'll even get the police.*

ALOWEMER: *So they have to lock down the whole – whole Pittsburgh.*

29. ALOWEMER used two printed Google satellite maps to explain the details of the proposed plot to the UCE, although the maps did not provide street names or any identification of the target location. At the conclusion of the meeting, ALOWEMER provided the maps to the UCE to keep along with two pages printed from the aforementioned “Beginners Course for Young Mujahedeen” and 11 pages containing lyrics to what an FBI linguist described as jihadi “nasheeds.” Based on ALOWEMER’s use of the two Google satellite maps to describe his proposed attack plan and subsequent research of public sources, the FBI identified the Church as the Legacy International Worship Center, located at 2131 Wilson Avenue in Pittsburgh, Pennsylvania.

30. Furthermore, during the meeting on or about June 2, 2019, ALOWEMER discussed with the UCE what supplies ALOWEMER could purchase to enable the construction and assembly of an explosive device strong enough to destroy the Church. ALOWEMER agreed to purchase 9-volt batteries, acetone (in the form of nail polish remover), ice packs, and nails for use in constructing the device to be used in the attack upon the Church, which would be similar to some of the devices described in the manuals sent by ALOWEMER to the UCE. ALOWEMER and the UCE agreed that, to avoid suspicion, they should make purchases of these items at different times, in small quantities, and from different stores. On several occasions throughout the meeting, the UCE made clear that the explosive force necessary to accomplish ALOWEMER’s desired attack would likely kill many people in the residential area surrounding the Church, even if the Church

were unoccupied at the time of explosion, to which ALLOWEMER did not object.

31. On or about June 11, 2019, ALLOWEMER, the UCE, and the CHS met in-person for a fourth time in the Pittsburgh area for approximately two and one-half hours. At this meeting, ALLOWEMER delivered more details regarding his plan to bomb the Church. ALLOWEMER also provided the UCE and the CHS with the items that he had purchased in the preceding days that were intended to be used for assembly of the destructive device: six bottles of nail polish remover, seven ice packs, and three 9-volt batteries. ALLOWEMER also apologized for not purchasing nails and asked the UCE whether ball bearings would suffice as shrapnel to be used in the explosive device. Regarding the batteries, the UCE demonstrated to ALLOWEMER, using a timer that the UCE had brought to the meeting, that the 9-volt batteries that ALLOWEMER had provided would connect directly to the timer to permit delayed detonation of the explosive device. Consistent with their prior communications, ALLOWEMER told the UCE that he wanted to be involved in the construction, “cooking,” and testing of the explosive device with the UCE.

32. Furthermore, during the meeting on or about June 11, 2019, ALLOWEMER drove the UCE and the CHS to the Church to show them the location, assess the environment, and determine what explosive charge would be needed and where ALLOWEMER would eventually place the backpack containing the destructive device. ALLOWEMER pointed out the intended movements of their respective cars to assure a clean escape from the scene and identified where he intended the CHS to park, in the vicinity of a nearby police station, to conduct surveillance prior to and while ALLOWEMER placed the explosive device at the Church. When asked by the UCE how ISIS would be able to claim credit for the attack, ALLOWEMER suggested leaving an ISIS-affiliated flag or a sign with the words “we arrived,” or some variant thereof, near the scene of the attack.

33. Also during the meeting on or about June 11, 2019, ALLOWEMER provided the

UCE and the CHS with printed copies of more detailed Google satellite maps, including with street names and handwritten markings identifying the Church and routes of arrival and escape, as well as handwritten instructions in Arabic for the execution of the operation, which are included as attached exhibits (1-4) to this Complaint. ALOWEMER's handwritten instructions, as translated by an FBI linguist, follow:

In the name of Allah the Merciful

Confirmation of this operation

- 1) *If we carry out this operation during the blessed month of Ramadan we will be putting our Muslim brothers in danger because mosques during this blessed month will be full and the enemies of Allah almighty will attempt to take revenge.*
- 2) *This operation must be done on a Sunday night¹³ in order to shock the enemies of Allah almighty everywhere and all over America, and in order to [illegible] from going to their churches and instill fear in their hearts. Around 3:00 or 4:00 at night.*
- 3) *We should be two or three brothers. One to drive the vehicle and the other to throw the cooker and the third to surveil, we should sneak in quietly through the woods.*
- 4) *Equipment for this operation (one of two backpacks/suitcases) for the operation, a vehicle not from the same city and we should cover the license plate.*
- 5) *There are two ways to get out of this operation safely if Allah almighty wills.*
- 6) *Long before the operation we should park a short distance away from the site and wait.*
- 7) *If Allah almighty destined this operation to succeed we should not communicate for a long period of time because the enemies of Allah will be more vigilante [sic] after this period. We should also be silent on social media or maybe we should delete all our accounts on all social media platforms for a while until things calm down.*

¹³ Based on my communications with the UCE and the CHS and review of other statements made by ALOWEMER in relation to his proposed plot, it is reasonable to assume that ALOWEMER is referring to the late hours of Saturday night and the early hours of Sunday morning as opposed to Sunday night.

- 8) *According to what the Caliph of the Muslims told the mujahedeen; we should not confront the enemies of Allah face to face, we should sneak in so as the enemies of Allah will not feel us and we break their backs if Allah almighty wills.*
- 9) *We should - with the permission of Allah almighty - pay attention to the locations of the infidel police and how they move and we should observe all cameras if Allah almighty wills.*

With the permission of Allah almighty

- *[CHS] will take my vehicle and wait by the police department to observe any movements towards us.*
- *After executing the operation if Allah wills, [CHS] will head towards the location planned/selected by [ALOWEMER] if Allah wills and will meet over there if Allah wills.*
- *Clothing will be different at the time of the operation and after if Allah wills.*

(The most important thing is [social] media silence) and not to communicate for a short period of time if Allah wills.

34. At the close of the meeting on or about June 11, 2019, ALOWEMER expressed his intention to conduct further surveillance of the Church on his bicycle in order to determine, without drawing suspicion, the presence of security cameras and to decide upon the best location to meet the UCE and the CHS prior to the execution of the bombing of the Church. ALOWEMER also told the UCE and the CHS that he wanted to meet with them one more time to conduct final planning and coordination prior to carrying out the attack sometime during the month of July 2019. On or about June 13, 2019, ALOWEMER indicated to the UCE that he would attempt to purchase additional components, including nails, for construction of the planned explosive device, in addition to asking about the size of the backpack needed to carry the device. On or about June 14, 2019, ALOWEMER confirmed with the UCE that he was available to meet again with the UCE and the CHS on June 19, 2019, in the Pittsburgh area. On or about June 16 and June 17, 2019, FBI

personnel witnessed ALLOWEMER purchase at least six boxes of nails at multiple stores in the Pittsburgh area.

35. Throughout ALLOWEMER's conversations, both in-person and online, with the OCE, the UCE, and the CHS, ALLOWEMER displayed an increasingly sophisticated level of operational security and strategic planning. For example, ALLOWEMER deleted the majority of his prior social networking and mobile messaging accounts and subsequently created new accounts with new monikers on multiple encrypted mobile messaging applications to continue his conversations with the OCE, the UCE, and the CHS, which included ALLOWEMER's use of coded language. ALLOWEMER also utilized or discussed other methods of operational security, including arriving early to planned meetings with the UCE and the CHS to conduct surveillance of the meeting areas; identifying the presence of security cameras and law enforcement personnel near potential attack targets; and making small, cash-only purchases of IED components at different stores. Furthermore, ALLOWEMER indicated on multiple occasions that he knew his current and planned activities in support of ISIS were illegal and, therefore, could result in his arrest.

36. Based on the aforementioned information, there is probable cause to believe that MUSTAFA MOUSAB ALOWEMER attempted to provide material support or resources to ISIS, in the form of services, and personnel, including himself, in violation of Title 18, United States Code, Section 2339B(a)(1) (Count 1); and 2) that ALOWEMER distributed information relating to an explosive, destructive device, or weapon of mass destruction, in violation of Title 18, United States Code, Section 842(p)(2)(B) (Counts 2 and 3).

Nicholas Edquist

NICHOLAS EDQUIST
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me on this
18th day of June, 2019

Cynthia R Eddy

CYNTHIA REED EDDY
Chief United States Magistrate Judge

Exhibit 1: Map of Proposed Church Attack Provided by ALLOWEMER



Exhibit 2: Map of Surveillance Activity Related to Proposed Church Attack Provided by ALLOWEMER

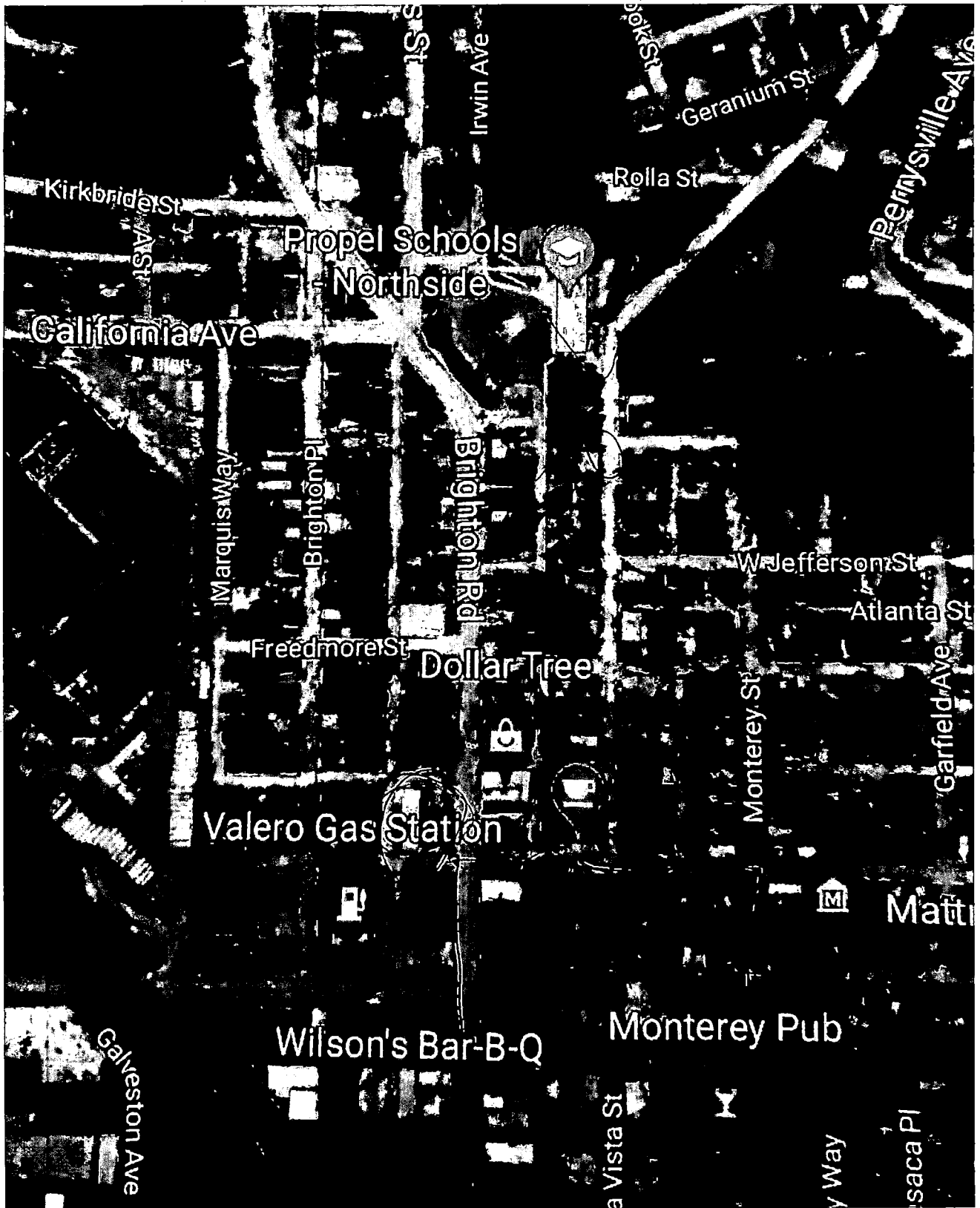


Exhibit 3: Page 1 of ALLOWEMER's Handwritten Operational Instructions

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

تعليمات هذه العملية

(1) إذا كنا نذهب للعمل في شهر رمضان المبارك، سوف نوجه الخطر نحو
 أهواننا المستعدين. لأن في هذه الشهر المبارك سوف تكون المساجد
 ممتلئة واعداء الله عز وجل سوف يحاولون أن يأخذوا بنا
 يجب أن نكون هذه العملية يوم الأحد ليلاً حتى نضمن اعداء الله
 عز وجل في كل مكان ذلك (مركز) حتى نربطهم من الزحف إلى مكانهم
 وتكون الخوف في قلوبهم عند 3:00 أو 4:00 ليلاً

(2) يجب أن نكون اذان أو ثلاث. اهد يقود السيارة والافر يسي (الفرقة)
 والثالث مراقب، ويجب ان تتسلا عن هريقت (الغابات
 وهدوء)

(3) معدات هذه العملية (مقبض او مقبضان) للعمله وسياره
 ليست من المديرة نفسها ويجب ان نضمن النيو
 يوجد طريقتين هي نخرج من البيت من هذه العملية بان الله عز وجل
 يجب ان نركن وننتظر نسير عن المكان قليلاً بقبل الوقت
 للعمله تكبير

(4) اذا من الله عز وجل نبدأ هذه العملية يجب ان لا نتعاطل طه
 طوره لأنه اعداء الله سوف يزدادون تدقيقاً بعد هذه الفتن ويجب
 ان نتكلم اعلامية، وربما يجب ان نخدم جميع مسابلاتنا على جميع
 الاباكن للتواصل لغتي لله الحمد لك تسبيح
 اما بالنسبه لما قاله خليفة المسلمين وهو لا يهمل احد من
 هو ان يجب ان لا نواجه لعداء الله وجهه ان وجهه ملكنا بالكل
 التسلاات هي لا يشعرا اعداء الله علينا ونكسر ظهورهم باذن
 الله تعالى

(5) يجب علينا اذن الله تعالى ان نتسبه على مواقع المشهوره
 الكافرو وكيف تحرقنا لهم ويجب علينا ان نرهب جميع الاعيان
 هذا باذن الله تعالى

بأن الله عز وجل

Exhibit 4: Page 2 of ALLOWEMER's Handwritten Operational Instructions

ما يوجد فيه بأحد سيارتي وينظر من مركز الشرطة
للرافقه اي قرآن كونها
بعد تصفيتها عليه ان شاء الله ابو حفصه ليتم في
الهدف الذي يظنه ابو سفيان ان شاء الله وسوف
يكون اطلاقه هنا ان شاء الله.
والا يسهل سوف يكون فتلته عن العليه وبعدها
ان شاء الله
(ان شاء الله) بعد العليه وعيد التواكل
ان شاء الله طه قهيره