

1 the U.S. Army National Guard, for which he was required to successfully complete a certain
2 amount of college coursework before final enrollment and attendance at boot camp.

3 In or before April 2013, TEAUSANT began exploring methods of supporting violent
4 jihad and providing material support to various terrorist organizations, including what was
5 previously known as al Qa'ida in Iraq and has since become known as the Islamic State of Iraq
6 and the Levant ("ISIL") or, alternately, the Islamic State of Iraq and Syria ("ISIS"). That group,
7 under any of its various names, is a designated foreign terrorist organization, under Section 219
8 of the Immigration and Nationality Act, Executive Order 13224, 77 FR 73732, 77 FR 4082, and
9 has been so designated under one or more of these provisions since 2004. Abu Bakr al-Baghdadi,
10 the leader of the group since 2010, was designated by the U.S. Department of State in 2011 as a
11 "Specially Designated Global Terrorist." 76 FR 62494.

12 TEAUSANT's exploration of violent jihad included internet postings and social media
13 based inquiries. He also posted statements regarding his desire to engage in violent jihad. In May
14 2013, under "Assad Teausant bigolsmurf," TEAUSANT posted on Instagram: "Lol I been [sic]
15 part of the army for two years now and I would love to join Allah's army but I don't even know
16 how to start." TEAUSANT also attempted to obtain, and ultimately was successful in obtaining,
17 a copy of the "lone Mujahid [sic] pocket book," a how-to guide for engaging in terrorist
18 activities published by Inspire magazine, an arm of al Qa'ida in the Arabian Peninsula. In late
19 July 2013, on the ask.fm forum, TEAUSANT indicated that he wanted to go fight in Syria. In or
20 about late July 2013, TEAUSANT answered users' questions on the forum ask.fm:

21 Question: are you a terrorist??

22 Answer: Lol as if I would tell the truth about That haha wow and no I'm not.

23 Question: Where do you wanna go for fighting ... hebah

24 Answer: wa alaikum salaam [greetings]. I want to go fight in Syria.

25 In early October 2013, TEAUSANT was introduced to a confidential human source
26 ("CHS") working for the FBI by a mutual acquaintance (who was unaware of and is otherwise
27 unrelated to this investigation) because the acquaintance understood both CHS and TEAUSANT
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1 were converts to the Muslim religion. The day after they met, TEAUSANT advised that he had
2 obtained the Mujahedeen pocketbook, and that he had used measures to ensure that the
3 downloading of the book could not be traced to him. In that month, TEAUSANT advised the
4 CHS that he, TEAUSANT, wished to go fight in Syria.

5 On January 4, 2014, the CHS asked TEAUSANT what he actually wanted to do, since
6 TEAUSANT had expressed an interest in engaging in a number of different violent jihadist
7 activities. TEAUSANT returned to his desire to go fight in Syria. The CHS inquired who
8 TEAUSANT wished to fight with, and TEAUSANT initially stated: "Uh-free Syrian army."
9 Later in the same conversation, TEAUSANT advised: "I like ISIS," and continued "Islamic state
10 of um crap ... I forget," The CHS stated that he knew someone who could help, but that
11 TEAUSANT should take a few days and decide whether he really wanted to pursue this course.

12 A few days after that meeting, TEAUSANT and the CHS spoke by phone, at which point
13 TEAUSANT told the CHS "you know my answer, I'm ready." TEAUSANT explained that he
14 intended to travel on his spring break because he could convince his mother that he would be
15 going snowboarding with a friend at Mount Whistler, and she would therefore not be suspicious
16 about why he wanted his passport. TEAUSANT and the CHS remained in limited contact, while
17 TEAUSANT advised he was trying to find his passport. The CHS advised TEAUSANT that he
18 could call off his plan, that the two would remain friends, but TEAUSANT advised his plans had
19 not changed and that he wanted to join ISIS, which he also called the Islamic State of Al Sham.

20 In a February 2014 meeting, TEAUSANT told the CHS that he wished to travel by bus
21 over the Canadian border, as opposed to the Mexican border, as he thought there was less
22 security. The CHS advised TEAUSANT that he could arrange a meeting with the facilitator, who
23 the CHS referred to as the CHS's mentor (the "mentor"), but who was actually an undercover
24 employee of the FBI. In a later meeting, on February 22, 2014, the CHS again reiterated that
25 TEAUSANT did not have to continue down this path, and that the two would remain friends.
26 TEAUSANT responded that his resolve was "pretty clean cut," and that it "kind of feels like
27 you're, like, trying to push me not to" go to Syria and join ISIS.

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1 On March 5, 2014, TEAUSANT met with the mentor, told the mentor he was “very
2 supportive of ISIS,” which he had researched before he converted to Islam. The mentor advised
3 TEAUSANT that the battlefield TEAUSANT was seeking was chaotic and unclear, and women
4 and children were dying as a result. TEAUSANT was undeterred. The mentor advised
5 TEAUSANT to take two days to think about what he wanted and they would meet again, or
6 TEAUSANT could call the CHS and let him know that he had changed his mind. TEAUSANT
7 responded that the CHS “really need[ed] to stop asking” if TEAUSANT was sure. Two days
8 later the mentor and TEAUSANT met, TEAUSANT advised he still wanted to join ISIS, and the
9 two discussed logistics of crossing the Canadian border to meet the mentor on the other side.

10 The next day, TEAUSANT asked the CHS if he knew anyone who would buy
11 TEAUSANT’s laptop so that TEAUSANT could earn funds for the train ticket. The CHS
12 facilitated the sale of TEAUSANT’s laptop for that purpose. TEAUSANT was advised that the
13 mentor could meet him in Canada over the weekend of March 23, 2014, to facilitate
14 TEAUSANT’s plan to join ISIS in Syria. On March 10, 2014, TEAUSANT purchased a train
15 ticket for travel on March 15, 2014, a week earlier than he had been advised to travel.
16 TEAUSANT boarded a train in Lodi, California on March 15, 2014, ultimately bound for
17 Vancouver, Canada via a series of trains and buses. At approximately 11:40 p.m. on Sunday,
18 March 16, 2014, TEAUSANT was stopped by U.S. Customs and Border Protection in Blaine,
19 Washington, just short of the Canadian border. TEAUSANT advised CBP agents that he was in
20 fact traveling to Vancouver, Canada.

21 In an interview with the FBI immediately after the border stop, TEAUSANT confirmed
22 that he intended to join ISIS to fight in Syria, that he wanted to be a “personal guard” to the ISIS
23 leader, and that he wanted to “take out” Bashar al Assad and hoped that made the Syrian regime
24 fall. TEAUSANT denied antagonism toward the United States and knowledge that ISIS was a
25 terrorist group. However, he described ISIS’s tactics as including RPGs (rocket propelled
26 grenades) and AK-47s, and taking hostages. He acknowledged fighting between ISIS and the
27 Free Syrian Army (“FSA”) and also acknowledged that the actions of ISIS in Syria were
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violations of Syrian law and would be violations of United States law if they took place in the United States.

DATED: November 24, 2015

Respectfully submitted,

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DATED: November ³⁰24, 2015

Respectfully submitted,


NICHOLAS TEAUSANT