

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

v.

NASER JASON ABDO

CRIMINAL COMPLAINT

CASE NUMBER:


I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about July 27, 2011, in Bell County, in the Western District of Texas defendant(s), did possess a firearm, as defined by Title 26, United States Code, Section 5845(a) and (f), namely: a destructive device, which firearm was not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Section(s) 5861(d) and 5871.

I further state that I am a(n) Special Agent, Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVITS

Continued on the attached sheet and made a part hereof: YES



JAMES E. RUNKEL,
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

July 28, 2011

Date

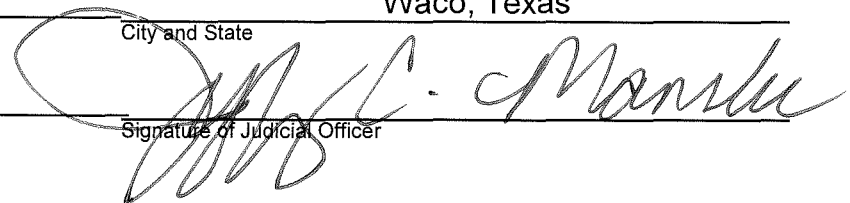
Jeffrey C. Manske

U.S. Magistrate Judge

Name & Title of Judicial Officer

Waco, Texas

City and State



Signature of Judicial Officer

AFFIDAVIT

Your Affiant, James E. Runkel, being duly sworn, deposes and says:

I am employed by the Federal Bureau of Investigation as a Special Agent and am assigned to the Austin, Texas Resident Agency. Affiant has been so employed by the FBI for four years.

I am a graduate of New Agent Training at the FBI Academy in Quantico, Virginia, and the FBI Weapons of Mass Destruction Basic Course. As a result of my training and experience as an FBI Special Agent, I am familiar with Federal explosive laws and know that it is unlawful for any person to possess an unregistered firearm or destructive device, in violation of Title 26, United States Code, Section 5861(d).

The following information comes from affiant's own investigation and information provided to affiant by other agents/officers and persons involved in this investigation:

On July 27, 2011, **NASER JASON ABDO** was arrested on outstanding warrants by the Killeen Police Department at the America's Best Value Inn and Suites, 1100 South Fort Hood Road, Killeen, Texas, located in Bell County, Texas, which is within the Waco Division of the Western District of Texas. **NASER JASON ABDO** was in possession of a backpack at the time of his arrest. **NASER JASON ABDO** made statements to the arresting officers that he intended to conduct an attack against Killeen and Ft. Hood. **NASER JASON ABDO** also indicated in response to questioning that there were explosives in the backpack and in his room. A Killeen Police Detective confirmed with America's Best Value Inn and Suites management that **NASER JASON ABDO** was checked in to room #230 of the hotel.

The backpack being carried by **NASER JASON ABDO** was searched. Some of the items found inside the backpack searched by the officers were as follows: two clocks; two spools of auto wire; Winchester .40 caliber ammunition; Springfield .40 caliber handgun, model XD. Also included in the backpack was an article entitled "Make a bomb in the kitchen of your Mom," and a handwritten list in a composition notebook of the following items, (listed verbatim): red black green wire; 9v bat, Christmas lights; pressure cooker; power drill; (unidentifiable symbol) 160 gunpowder; gorilla tape; metal epoxy, glue; 1 small box of shotgun shells; cardboard box; gloves; and honeycomb lenses for

Bino's.

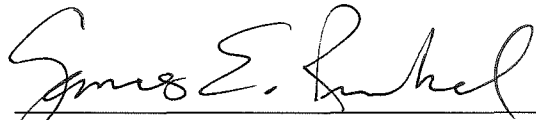
On the same date, the Killeen Police Department executed an authorized State of Texas, County of Bell search and arrest warrant at the America's Best Value Inn and Suites, room number 230. Special Agents from the FBI, including the affiant, assisted with the search of the aforementioned hotel room. Items seized include, but are not limited to the following items: electric drill; two clocks; six bottles of smokeless gunpowder; five cut shotgun shells; three Springfield ammunition magazines; four razorblades; shotgun pellets; and two pressure cookers.

FBI Special Agent Bomb Technician Stephen C. Hauck, assigned to the FBI Austin Resident Agency, who is trained in recognizing destructive devices, their components and their designs, has examined the seized components identified in the previous two paragraphs of this affidavit. Special Agent Hauck is an expert in destructive devices and their components. Special Agent Hauck advised your affiant that, based upon his training and experience, the seized components are those which can be used to construct a destructive device, as that term is defined in federal law. That is, Special Agent Hauck advised affiant the components are parts or are a combination of parts either designed or intended for use in converting any device into a destructive device as defined in Title 26 United States Code, Section 5845(f) and from which a destructive device may be readily assembled. Therefore, the parts or combination of parts is a "destructive device" within the meaning of that Title. A "destructive device" is defined as a "firearm" under Title 26, United States Code, Section 5845 for the purposes of that Title.

Other FBI personnel interviewed **NASER JASON ABDO** on July 27, 2011, subsequent to his arrest by the Killeen Police Department. Affiant learned from the FBI personnel that **NASER JASON ABDO** admitted that he planned to assemble two bombs in the hotel room using gun powder and shrapnel packed into pressure cookers to detonate inside an unspecified restaurant frequented by soldiers from Fort Hood, Texas.

Affiant knows from his training and experience that under Federal law an individual must have a destructive device registered in the National Firearms Registration and Transfer Record (NFA) in order to be lawfully possessed. Based on the attached affidavit of Special Agent George Ryan Taylor of the Bureau of Alcohol, Tobacco, Firearms and Explosives, affiant believes that no destructive devices are registered to **NASER JASON ABDO**.

Based on the above information, affiant believes that probable cause exists for the issuance of an arrest warrant for **NASER JASON ABDO** for Title 26, USC 5861(d), Possession of an Unregistered Destructive Device.


James E. Runkel, Special Agent, FBI

Sworn to and subscribed before me, on this the 28th day of July 2011.


Jeffrey C. Manske, United States Magistrate Judge

AFFIDAVIT

Your Affiant, George R. Taylor, being duly sworn deposes and says:

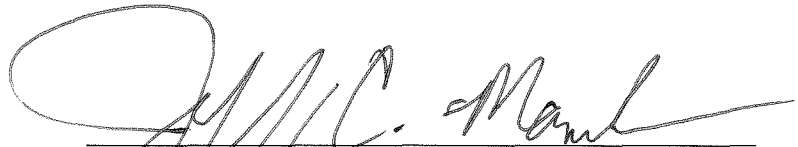
That he is employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives as a Special Agent and is assigned to the Waco Satellite office. Affiant has been so employed since July of 2002. Affiant is a graduate of the Federal Law Enforcement Training Center and the ATF National Academy. As a result of my training and experience as an ATF Special Agent, I am familiar with Federal firearms laws and know that it is unlawful for any person to possess a firearm, that is, a destructive device, which is not registered to him in the National Firearms Registration and Transfer Records (NFA), in violation of Title 26, United States Code, Section 5861(d).

On July 28, 2011, affiant caused a query of the NFA records for the name of **NASER JASON ABDO**. There were no firearms, including destructive devices, registered to **NASER JASON ABDO**. Therefore, **NASER JASON ABDO** cannot lawfully possess a destructive device, that is, a firearm, as those terms are defined in Title 26, United States Code, Section 5845.



GEORGE R. TAYLOR, Special Agent
Bureau of Alcohol, Tobacco & Firearms

Sworn to and subscribed before me, on this the 28th day of July, 2011.



JEFFREY C. MANSKE
United States Magistrate Judge