

18-00784 MJ

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On April 26, 2017, Ahmad, CS3, CS4, and two undercover FBI agents travelled from Tucson, Arizona, to Las Vegas, Nevada. Ahmad brought along a number of his own items to assist in constructing the bomb, including a circuit tester, electrical tape, and tubes of Permatex Epoxy. The undercover agents brought the other items required to build the bomb, which were obtained from a list provided by Ahmad. Once they were in Las Vegas, they all went to a condominium. Over the course of several hours, Ahmad built the device and described what he was doing to one of the undercover agents. Ahmad showed one of the agents how to connect the blasting caps and where to place the C-4. Ahmad then guided the undercover agent on how to make a second device. Once both devices were completed, Ahmad explained how they operated.