

**FILED
HARRISBURG**

DEC 17 2015

PER Koh
DEPUTY CLERK

UNITED STATES DISTRICT COURT

for the
Middle District of Pennsylvania

United States of America)
v.)
JALIL IBN AMEER AZIZ)

Case No.

1:15-MJ-81

Defendant(s)

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 July 2014 to the present in the county of Dauphin in the
Middle District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC §§ 2339B	Conspiring, and attempting to provide, material support or resources to a designated foreign terrorist organization.

This criminal complaint is based on these facts:

I, Jeffrey D. Gruppo, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Continued on the attached sheet.

Jeffrey D. Gruppo
Complainant's signature

Jeffrey D. Gruppo, SA, Task Force Officer, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 12-17-15

Martin C. Carlson
Judge's signature

City and state: Harrisburg, Pennsylvania

Martin C. Carlson, Chief Magistrate Judge
Printed name and title

AFFIDAVIT (CONTINUED)

I further state that I am a Special Agent with the Pentagon Force Protection Agency (PFPA) assigned to the Federal Bureau of Investigation Joint Terrorism Task Force (JTTF), and that this complaint is based on the following facts:

1. I am a Special Agent ("SA") with the Pentagon Force Protection Agency ("PFPA") assigned to the Federal Bureau of Investigation ("FBI") Joint Terrorism Task Force ("JTTF") as Task Force Officer (TFO). I have been a SA with PFPA since October of 2010. Prior to obtaining my position as a SA with PFPA, I was employed as a PFPA Police Officer since December of 2006. I have been assigned to the FBI JTTF since October 2014.
2. As both a SA with PFPA and as a TFO with the FBI JTTF, I have worked on investigations relating to international terrorism and violent extremists. My experience as a Special Agent has included the investigation of cases involving the use of computers and the Internet to commit terrorism related offenses. I have received training and have gained experience in interview and interrogation techniques, arrest procedures, obtaining electronically stored information through criminal process, search warrant applications, and the execution of searches and seizures. I have also received training and information, and gained experience concerning terrorism crimes, as well as the tactics, techniques, and procedures used by terrorism suspects to evade detection. I have personally participated in the

execution of search warrants involving the search and seizure of computers and electronically stored information.

3. As a federal agent, I am authorized to investigate violations of laws of the United States and execute warrants issued under the authority of the United States.

4. I make this affidavit in support of a criminal complaint charging defendant JALIL IBN AMEER AZIZ ("AZIZ") with conspiring and attempting to provide material support and resources to a foreign terrorist organization in violation of Title 18, United States Code, Section 2339B.

5. The information contained in this affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers, information provided by witnesses, a review of open source material, and the review of documents and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the Criminal Complaint, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the pertinent offenses.

6. In this affidavit, the FBI has provided translations of certain Arabic words or phrases. I made these translations based on information provided to me

from an FBI linguist, and from my training and experience. I have indicated the translations using brackets.

PROBABLE CAUSE

Introduction

7. AZIZ is a 19-year old citizen of the United States. He currently resides at 1733 Fulton Street, Harrisburg, Pennsylvania 17102, within the Middle District of Pennsylvania.

8. An investigation by the JTTF has revealed that AZIZ espouses violent jihadist beliefs and is a fervent supporter of a foreign terrorist organization known as the Islamic State of Iraq and the Levant (“ISIL”). AZIZ uses social media to spread ISIL propaganda and to seek support for the terrorist group from individuals over the internet. AZIZ's social media activity supports ISIL by radicalizing and recruiting others. AZIZ has conspired with others and attempted to facilitate the travel of other ISIL supporters to Syria so that they can become ISIL fighters. Furthermore, your affiant believes that AZIZ may be preparing to conduct or assist others in conducting an attack in the United States based on the discovery of a backpack containing numerous high-capacity weapons magazines, ammunition, a knife, and other survival items during a November 27, 2015 physical search of AZIZ's residence. *See ¶ 40 supra.*

Overview of the Islamic State of Iraq and the Levant (“ISIL”)

9. On October 15, 2004, the United States Secretary of State designated al-Qa’ida in Iraq (AQI), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under Section 1(b) of Executive Order 13224.

10. On May 15, 2014, the Secretary of State amended the designation of al-Qa’ida in Iraq (“AQI”) as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham (“ISIS”), 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. Although the group has never called itself “Al-Qaeda in Iraq (AQI),” this name has frequently been used to describe it through its history. To date, ISIL remains a designated FTO. In an audio recording publicly released on or around June 29, 2014, ISIL announced a formal change of its name to the Islamic State (“IS”). Abu Bakr al-Baghdadi is the current leader of ISIL.

11. The State Department has reported that, among other things, ISIL has committed systematic abuses of human rights and violations of international law, including indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of identity, kidnapping of civilians, forced displacement of Shia communities and minority groups, killing and maiming of children, rape, and other forms of sexual violence. According to the State Department, ISIL has recruited thousands of foreign fighters to Iraq and Syria from across the globe and leveraged technology to spread its violent extremist ideology and for incitement to commit terrorist acts.

12. Beginning in 2014, using social media, ISIL has called for attacks against citizens - civilian and military - of countries participating in the United States led coalition against ISIL. For instance, on September 21, 2014, ISIL released a speech of Abu Muhammed Al-Adnani, a senior leader and official spokesman of ISIL. In this speech, entitled, "Indeed Your Lord is Ever Watchful," Al-Adnani calls on Muslims who support ISIL from around the world to "defend the Islamic State" and to "rise and defend your state from your place where you may be." More recently, using social media, ISIL has been encouraging individuals to kill specific persons within the United States.

AZIZ Provides Material Support to ISIL

Background on AZIZ and Twitter

13. AZIZ has created and used at least 57 different Twitter accounts. It appears that Twitter routinely suspends AZIZ's accounts due to the radical nature of his postings, which violate Twitter's policies. AZIZ then responds by creating backup accounts or opening a new Twitter account with slightly different variations of common user names that he uses. AZIZ frequently uses a variation of "Colonel Shami" as either his username, vanity name, or to refer to himself. AZIZ also commonly re-establishes contact with common associates of his on Twitter.

14. All of AZIZ's Twitter accounts referenced herein have either been created or logged-in from Internet Protocol ("IP") addresses assigned to a subscriber account at the residence AZIZ shares with his parents. The residence is located at 1733 Fulton Street Harrisburg, Pennsylvania 17102. Based on physical surveillance, your affiant believes that AZIZ lives at this residence with his parents and that AZIZ and his parents are the only people living at this residence.

AZIZ Uses Twitter to Pledge Support to ISIL, Spread ISIL Propaganda, and Radicalize Others

15. AZIZ commonly uses his Twitter accounts to spread pro-ISIL propaganda, including news from ISIL sources as well as execution photos and

videos. Open sources¹ revealed that AZIZ has also used his Twitter accounts to directly and indirectly advocate for violence, encourage individuals to provide monetary support for jihad, express his desire to make pilgrimage to ISIL-controlled territory, provide advice about how to travel inconspicuously, and facilitate others' travel to fight for ISIL.

16. AZIZ has used Twitter to pledge allegiance to ISIL and its leader, al Baghdadi. On or about June 29, 2014, AZIZ, using the Twitter account @AnsarUmmah, posted "My bayah to sheikh Abu bakr Al Baghdadi." [In this context the term "bayah" translates to allegiance].

17. AZIZ has used Twitter to advocate for violence. On or about January 8, 2015, AZIZ, using account @AnsaralUmmah8, tweeted "#KillAllKufar #KillAllKufar #KillAllKufar #KillAllKufar #KillAllKufar #KillAllKufar #KillAllKufar #KillAllKufar." [The term "kufar" translates to "infidels" and I believe is synonymous with "non-believers" in this context].

18. On or about January 29, 2015, AZIZ, using Twitter account @Colonel_Shami, tweeted "#IS "Know O Obama, that we are coming to America and know that we will sever your head in the White House" "." This post also included a picture of a masked militant about to behead an unknown soldier. The

¹ Open sources are those which are readily available and accessible to the public, as well as law enforcement.

affiant believes that AZIZ was sharing ISIL messages and propaganda regarding threats against the United States.

19. In or about February 2015, AZIZ, using Twitter account @AnsaraUmmah13, posted or re-posted numerous Tweets, some of which advocated for violence in the United States. The Tweets appear to have been made in response to the shooting of three Muslim individuals in Chapel Hill, North Carolina on or about February 10, 2015. The Tweets are as follows:

a. On or about February 11, 2015, AZIZ retweeted from @abubritani3, “#usa will pay for #ChapelHillShooting we will make sure you don’t live in peace,”

b. Also on February 11, 2015 AZIZ tweeted “This martyrdom will be a spark that will awaken sleeping lions in America, let their blood watered the seeds of jihad.#ChapelHillShooting,” and “Dear moderates. Give up a life of humiliation-kissing the boot of the kufaar oppressors for a life of liberation in #IS #ChappelHillMartyrs.”

20. On or about April 16, 2015, AZIZ, using Twitter account @AnsaraUmmah2Bl tweeted “Perform your Islamic duty. Support the Jihad with your wealth. Surah Baqarah (2:195) RT & SHARE DM for more info.” Your affiant believes that AZIZ is encouraging others to provide funding to jihadi groups, most likely ISIL. Your affiant further believes that by asking potential

fundes to “DM,” AZIZ is encouraging fundes to message him directly using Twitter. Twitter’s direct messaging function is private and messages sent using this function are only viewable to the participants in the conversation.

21. Law enforcement has confirmed that on or about March 21, 2015, AZIZ, using Twitter account @Baqiyaah201S posted to Twitter account @_Qariban_ talking about how to covertly travel to the Islamic State and mask the intention of the travel. Using Twitter account @Baqiyaah201S, AZIZ tweeted the following, “Hmmm so if I want make hijrah to Islamic State just act like person who going there to do Civilians jobs?”. AZIZ then continued "...May Allah make our hijrah easy inshallah. Maybe one can go there as university student to study in Mosul University.”

22. On or about March 21, 2015, AZIZ, using Twitter account @Baqiyaah201S, tweeted “Pennsylvania have very light gun laws its very easy to arm yourself.”

23. On or about May 2, 2015, AZIZ, using Twitter account @AnsaralUmmah49, tweeted ““When can be like him?? [emoji] Pray for me to be with my bros and get a VISA to Jannathul firdouse.[emoji] Jazakallah khair” [The term “VISA to Jannathul firdouse” translates to “a visa to paradise (or heaven)”). Your affiant believes that AZIZ is expressing his desire to gain entry to heaven by conducting jihad or becoming a martyr.

24. On the same day, AZIZ, using Twitter account @AnsaraUmmah49, and other Twitter users also discussed making “hijrah” [the term “hijrah” translates to “emigration,” but in some contexts, travel to land controlled by ISIL]. Twitter user @endofdrms tweeted, “@AnsaraUmmah49 one day I will probably see colonel shami made hijrah.” AZIZ, using Twitter account @AnsaraUmmah49, responded “@endofdrms [three smiling faces] inshallah akhi.” Based on the investigation, your affiant believes that “colonel shami” is an alias frequently used by AZIZ. Your affiant believes that AZIZ’s response suggests that he intends to travel to territory controlled by ISIL. On more than one occasion, AZIZ has declared his desire to travel to the “Islamic State.” Additionally, AZIZ has also expressed an interest in disguising the purpose of his travel, as discussed in paragraph 15.

25. On or about May 30, 2015, in response to a then upcoming Draw Mohammed event in Phoenix, Arizona, Twitter user @GhanimaHaqq [AZIZ] reposted from @NdangeredSpecie “I hope the brothers have nailbombs ready for those protesters. Kill them all.”

26. On or about July 21, 2015, Twitter user @MuslimBruh0 [AZIZ] carried on a Twitter conversation with other Twitter users about purchasing Yazidi women for slaves. For his part in the conversation, @MuslimBruh0 [AZIZ] posted the following:

“@_I__I__I__I @Etimdz How much the yazidi women cost plus what’s there ages??”

“@Etimdz @_I__I__I__I I’m serious, I’m considering on buying one girl inshallah once I arrive in Islamic State loooool”

“@TheScimitar107 @YesSirQadhi @Etimdz @_I__I__I__I I just want one girl 17yearsold”

27. The affiant assesses that AZIZ was not only talking about purchasing a female slave, but also talked about traveling to the “Islamic State.” The reference to the “Islamic State” when used by ISIL supporters refers to the territory, mostly in Syria and Iraq, which is currently held by ISIL.

28. On or about July 24, 2015, @MuslimBruh0 [AZIZ] posted a Tweet about desire to travel to the “Islamic State.” “@peace_seeker1 @NdoSisi_ May Allah grant us a way to make hijrah to the Islamic State.” The affiant assesses that “hijrah” is a reference to traveling to an Islamic country, and in this instance AZIZ was again referring to the “Islamic State”, or ISIL territory.

29. Your affiant believes AZIZ is currently using Twitter accounts with a variation of “Islamic Analyst” in the name. On or about November 26, 2015, AZIZ, using @IslamicAnalyst5, tweeted, “Photo report [picture of a camera]: #IS sniper battalion in #Kirkuk.. #IslamicState #Iraq #ISIS Link: justpaste.it/p5yr pic.twitter.com/3je515n04q.” The links show multiple pictures of snipers in various settings.

30. AZIZ has also used Twitter to spread ISIL propaganda that advocated for violence against United States military members. On or about March 21, 2015, AZIZ using Twitter account @Baqiyaah201s tweeted “Well, US military guys are f**cked IS hacker division just revealed 100 of their address photos n Intel looooool #Baqiyah.” On the same day, AZIZ also posted “Yep them US guys are pretty F**ked all right excuse my language...” This post also contained a photo of United States service members and their identifying information.

31. On or about March 21, 2015, AZIZ using Twitter account @Baqiyaah201S tweeted “US Military Hacked by Islamic State Hackers [...]100 Addresses of Military Personnel Leaked!\”.” This Twitter posting also included a hyperlink to the full document released by the “Islamic State Hacking Division.” The affiant has reviewed this release and affirms that it contains the names of 100 reported United States military members, their alleged addresses and other identifying information, and calls for violence against them.

AZIZ’s Facilitation of Persons Seeking to Fight for ISIL

32. AZIZ has been contacted by multiple individuals about traveling to the Islamic State. Your affiant believes this is due in large part to AZIZ’s efforts to promote himself in the on-line extremist community as someone who can facilitate travel on behalf of ISIL. AZIZ has also cultivated a reputation within this on-line extremist community as someone who has important travel facilitation contacts

within ISIL. All travelers and travel facilitation contacts are identified as coconspirators. Unless otherwise noted, their identities are known to law enforcement.

33. Between May 26 and May 27, 2015, AZIZ conspired to facilitate the travel of Co-conspirator 1 (“CC-1”)² to fight for ISIL. CC-1 communicated with AZIZ via Twitter and requested assistance from AZIZ in traveling from Turkey to Syria. For purposes of future communications, AZIZ told CC-1 to download a U.S.-based messaging application that allows for encrypted communications. CC-1 later told AZIZ that he was unable to download the messaging application. Using Twitter, AZIZ provided CC-1 with maps and travel directions to Syria. Additionally, AZIZ discussed operational security measures with CC-1, such as wiping “pro IS” materials from CC-1’s laptop and not wearing “Muslims clothes.”

34. AZIZ, using Twitter account @KolonelSham, publicly tweeted to multiple other users and requested that they urgently contact him by direct message. In addition, AZIZ specifically informed CC-2 that a “brother” (meaning CC-1) needed help crossing the border from Turkey into Syria. AZIZ also shared maps of CC-1’s location with CC-2.

² Disclosure of the screen name could alert CC-1 or his/her associates of a law enforcement investigation. For the purpose of protecting the integrity of any ongoing investigations involved in this matter, the specific account names and other identifiers have been replaced with generic identifiers.

35. CC-2 provided AZIZ with a Turkish telephone number and suggested that CC-1 use other encrypted messaging applications to contact the number. CC-2 also provided AZIZ with another Twitter contact, which belonged to CC-3. AZIZ asked CC-2 to pray that AZIZ would make “hijrah safely.” CC-2 told AZIZ that he was located at a specific hotel in Saliurfa, Turkey³. AZIZ then provided CC-2 with a map of the area.

36. AZIZ then passed the Turkish phone number⁴ to CC-1. AZIZ and CC-1 also discussed meeting each other one day in the “Islamic State,” and AZIZ expressed his own desire to travel to the “Islamic State.” Law enforcement has confirmed that AZIZ shared at least 74 direct messages with the Twitter account of CC-1 and at least 41 direct messages with CC-2 and other ISIL members from May 26, 2015 to May 27, 2015.

37. On or about May 30 and June 1, 2015, AZIZ, using Twitter account @GhanimaHaqq, communicated again with CC-1, via CC-1’s Twitter account. During the conversation, CC-1 stated that he was not able to cross into Syria and left Turkey. CC-1 stated that he had downloaded the U.S.-based encrypted messaging application that he had previously been unable to download. AZIZ

³ I know this city to be located in Turkey, close to the Syrian border.

⁴ Based on my training and experience, I believe the country code is one that originates from Turkey.

responded with his screen name for that particular encrypted messaging application.

AZIZ Conspires to Facilitate CC-4 and CC-5's Travel to ISIL Territory

38. On or about May 30, 2015, AZIZ, using Twitter account @GhanimaHaqq communicated with Co-conspirator 4 ("CC-4"), on Twitter. Based on the conversation, it appears that CC-4 believed that AZIZ was located within the "Islamic State." CC-4 asked AZIZ for assistance in making hijrah to his country, and AZIZ responded that he was not in "shaam." Your affiant believes that "shaam" is a reference to other names used by ISIL, as discussed in paragraph 10. In response, AZIZ provided two of CC-2's Twitter accounts and instructed CC-4 to contact CC-2, who was located in the "Islamic State" at the time.

39. Between June 9 and June 10, 2015, AZIZ, using Twitter account @WiseHaqq, communicated with Co-conspirator 5 ("CC-5"). CC-5 asked AZIZ for advice on "hijra to Dawla Islamiya [the term Dawla Islamiya translates to Islamic State]." AZIZ responded by instructing CC-5 to contact Twitter user @Islamicstate02.

Law Enforcement Locates a Go-Bag with Ammunition and a Knife in AZIZ's Bedroom

40. On or about November 27, 2015, pursuant to a court-authorized search, law enforcement confirmed that there was a tactical-style backpack in AZIZ's closet. A search of the backpack identified five M4-style high-capacity

magazines loaded with 5.56 ammunition, a modified kitchen knife with the handle removed and wrapped in cloth or string, a thumb drive, a tin filled with various over-the-counter-medications, and a head wrap commonly referred to as a balaclava. The affiant believes this hood is a similar style worn by ISIL members to hide their identities.

CONCLUSION

41. Accordingly, Your Affiant respectfully requests that the Court approve the Criminal Complaint.

ATTACHMENT A

Count 1

In or about and between July 2014, and the present, both dates being approximate and inclusive, within the Middle District of Pennsylvania and elsewhere, defendant JALIL IBN AMEER AZIZ (AZIZ) together with others, did knowingly conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and personnel, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant (ISIL), in violation of Title 18, United States Code, Sections 2339B(a)(1).

Count 2

In or about and between July 2014, and the present, both dates being approximate and inclusive, within the Middle District of Pennsylvania and elsewhere, defendant JALIL IBN AMEER AZIZ (AZIZ), did knowingly attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and personnel, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant (ISIL), in violation of (Title 18, United States Code, Sections 2339B(a)(1).

FILED
HARRISBURG

DEC 17 2015

PER KJW
DEPUTY CLERK

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

IN RE SEALED MATTER

: NO:
: 1:15-MJ-81

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file the documents accompanying this Motion under seal for the reasons set forth in the accompanying sealed declaration in support of the government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

PETER J. SMITH
United States Attorney

/s/ Daryl F. Bloom
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FILED
HARRISBURG

DEC 17 2015

PER KJH
DEPUTY CLERK

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

IN RE SEALED MATTER : NO: 1:15-MJ-81
: :
: : (CHIEF MAGISTRATE JUDGE
: : JUDGE CARLSON)
JALIL IBN AMEER AZIZ :
: UNDER SEAL

DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Rule 6 of the Federal Rules of Criminal Procedure.

1. Your declarant states that, in the view of your declarant this Declaration and the following documents should be filed under seal:

- | | |
|--|--|
| <input type="checkbox"/> Indictment | <input checked="" type="checkbox"/> Complaint & Arrest Warrant |
| <input type="checkbox"/> Material Witness Warrant, and Affidavit | <input type="checkbox"/> Search Warrant, Application and Affidavit |
| <input type="checkbox"/> Plea Agreement | |

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

- Further Order of Court; or
- Written notification by the United States that these pleadings no longer need to remain filed under seal; or

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- Preserve the integrity of this ongoing case;
- Ensure the safety of investigative personnel;
- Protect the identity of potential witnesses;
- Allow for the seizure of evidence;
- Permit the arrest of those charged with violations of criminal laws;
- Allow this defendant to complete the cooperation aspects of the plea agreement; or
- Avoid unfair prejudice to the defendants.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

PETER J. SMITH
United States Attorney

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