

Approved: *Sarah Kushner*  
SARAH L. KUSHNER/KAYLAN E. LASKY  
Assistant United States Attorneys

Before: HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York

**23 MAG 218**

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: UNITED STATES OF AMERICA

: **COMPLAINT**

-v.-

: Violations of 18 U.S.C.

: § 1114

TREVOR THOMAS BICKFORD,

:

: COUNTY OF OFFENSE:

Defendant.

: NEW YORK

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SOUTHERN DISTRICT OF NEW YORK, ss.:

JACK AMARO, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), assigned to the FBI's New York Joint Terrorism Task Force ("JTTF"), and charges as follows:

**COUNT ONE**

**(Attempted Murder of Officers and Employees of the U.S. Government)**

1. From at least in or about November 2022, up to and including on or about December 31, 2022, in the Southern District of New York and elsewhere, TREVOR THOMAS BICKFORD, the defendant, knowingly and intentionally attempted to kill officers and employees of the United States, while such officers and employees were engaged in and on account of the performance of their official duties, and persons assisting such officers and employees in the performance of such duties and on account of that assistance, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BICKFORD, an adherent of violent Islamic extremism, devoted himself to the mission of waging jihad against the U.S. Government, and to execute that jihadist mission, BICKFORD traveled from Maine to New York City and, on or about December 31, 2022, he brought a machete-style knife to the area of the New Year's Eve festivities around Times Square in Manhattan, New York,

for the purpose of using that knife to kill military-aged men working for the U.S. Government.

(Title 18, United States Code, Section 1114.)

**COUNT TWO**

**(Attempted Murder of Officers and Employees of the U.S.  
Government and Persons Assisting Them - Officer-1)**

2. On or about December 31, 2022, in the Southern District of New York and elsewhere, TREVOR THOMAS BICKFORD, the defendant, knowingly and intentionally attempted to kill officers and employees of the United States, while such officers and employees were engaged in and on account of the performance of their official duties, and persons assisting such officers and employees in the performance of such duties and on account of that assistance, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BICKFORD attempted to wage jihad by killing military-aged men working for the U.S. Government, and in carrying out that mission, he attempted to kill a uniformed officer ("Officer-1") from the New York City Police Department ("NYPD") who was on duty working as part of a joint FBI-NYPD operation to provide protection to civilians during the New Year's Eve festivities around Times Square in Manhattan, New York.

(Title 18, United States Code, Section 1114.)

**COUNT THREE**

**(Attempted Murder of Officers and Employees of the U.S.  
Government and Persons Assisting Them - Officer-2)**

3. On or about December 31, 2022, in the Southern District of New York and elsewhere, TREVOR THOMAS BICKFORD, the defendant, knowingly and intentionally attempted to kill officers and employees of the United States, while such officers and employees were engaged in and on account of the performance of their official duties, and persons assisting such officers and employees in the performance of such duties and on account of that assistance, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BICKFORD attempted to wage jihad by killing military-aged men working for the U.S. Government, and in carrying out that mission, he attempted to kill a second uniformed NYPD officer ("Officer-2") who was on duty working as part of a joint FBI-NYPD operation to provide protection to

civilians during the New Year's Eve festivities around Times Square in Manhattan, New York.

(Title 18, United States Code, Section 1114.)

**COUNT FOUR**

**(Attempted Murder of Officers and Employees of the U.S. Government and Persons Assisting Them - Officer-3)**

4. On or about December 31, 2022, in the Southern District of New York and elsewhere, TREVOR THOMAS BICKFORD, the defendant, knowingly and intentionally attempted to kill officers and employees of the United States, while such officers and employees were engaged in and on account of the performance of their official duties, and persons assisting such officers and employees in the performance of such duties and on account of that assistance, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BICKFORD attempted to wage jihad by killing military-aged men working for the U.S. Government, and in carrying out that mission, he attempted to kill a third uniformed NYPD officer ("Officer-3") who was on duty working as part of a joint FBI-NYPD operation to provide protection to civilians during the New Year's Eve festivities around Times Square in Manhattan, New York.

(Title 18, United States Code, Section 1114.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

5. I have been involved in the investigation of this matter, and I base this affidavit on that experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

**Overview**

6. TREVOR THOMAS BICKFORD, the defendant, is a 19-year-old U.S. citizen and resident of Maine.

7. In or about the summer of 2022, TREVOR THOMAS BICKFORD, the defendant, began accessing and consuming materials

espousing radical Islamic ideology, including materials promoting the Taliban and reflecting the teachings of Abu Muhammad al-Maqdisi, a prominent radical Islamic cleric who was a spiritual mentor of al Qaeda. Over the ensuing months, BICKFORD radicalized, devoting himself to violent Islamic extremism and waging jihad.

8. At least as of in or about November 2022, TREVOR THOMAS BICKFORD, the defendant, was interested in traveling overseas to support the Taliban and took steps towards traveling to, among other places, Afghanistan in order to ally himself with the Taliban and work together with the Taliban to fight against governments that, in BICKFORD's view, oppress Muslims.

9. TREVOR THOMAS BICKFORD, the defendant, was determined to wage jihad against officials of governments that he believes are anti-Muslim, including the U.S. Government. BICKFORD ultimately decided that he would not travel overseas, and instead would wage jihad against the U.S. Government within the United States.

10. As part of that effort, on or about the night of December 31, 2022, after traveling from Maine to New York City, TREVOR THOMAS BICKFORD, the defendant, attacked three NYPD officers at or around 52nd Street and Eighth Avenue in Manhattan, in the area of the New Year's Eve celebration in nearby Times Square. Specifically, BICKFORD approached the NYPD officers, declared "Allahu Akbar," and attacked them with a large, curved knife similar to a machete. Before BICKFORD could attack more targets, one of the victim officers shot BICKFORD in the shoulder. After being treated at a local hospital, during a subsequent *Mirandized* interview, BICKFORD declared that he carried out the attack for the purpose of waging jihad and that BICKFORD's mission involved targeting military-aged men who worked for the U.S. Government and killing as many such officials as he could.

**BICKFORD's Radicalization and Plotting to Wage Violent Jihad**

11. Based on my participation in this investigation and my review of law enforcement reports, including reports reflecting interviews of members of the family of TREVOR THOMAS BICKFORD, the defendant, I have learned, in substance and among other things, the following:

a. Beginning in or about mid-December 2022, the FBI began investigating BICKFORD based in part on concerns that members of his family expressed about BICKFORD's behavior.

b. Specifically, according to certain of BICKFORD's family members, BICKFORD had recently converted to Islam and begun frequenting mosques in and around Maine and New Hampshire, where BICKFORD resided with different family members. BICKFORD also began researching the Taliban and expressed interest in traveling to Afghanistan to join the Taliban.<sup>1</sup> BICKFORD purchased a crossbow that he planned to bring with him to Afghanistan. BICKFORD believed that he was obligated by the Islamic religion to practice shooting that weapon every day.

c. In or about late November or early December 2022, BICKFORD told a family member that he wanted to travel to Jordan and/or Afghanistan so that he could be a suicide bomber for his religion. BICKFORD considered traveling to Afghanistan via Jordan. In or about mid-December 2022, BICKFORD exchanged text messages, which I have reviewed, with his older brother ("Brother-1"), a soldier in the U.S. military, in which BICKFORD expressed his intention to travel to Afghanistan to join the Taliban.<sup>2</sup>

12. Based on my review of travel records, I have learned that TREVOR THOMAS BICKFORD, the defendant, had booked a ticket to

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<sup>1</sup> Based on my training, experience, and review of publicly available information, I know that the Taliban is an Islamic fundamentalist paramilitary organization and political movement based principally in Afghanistan, which is dedicated to the imposition of strict Islamic law, or "Sharia," and is known for its violence. Among other things, as part of its deadly insurgency campaign to regain control of Afghanistan after losing power in 2001, as a result of the U.S.-led invasion of Afghanistan, the Taliban conducted numerous suicide bombings, targeted killings, assassinations, and hostage takings against U.S. military forces and American civilians.

<sup>2</sup> I have also reviewed prior text messages between Brother-1 and TREVOR THOMAS BICKFORD, the defendant, from in or about mid-November 2022, in which BICKFORD expressed an interest in joining the U.S. military special forces, at least in part because he believed that he was "obligated to kill terrorists who use the false flag of Islam to shroud their war crimes" and that enlisting would allow him to do that and fight against foreign governments that he believed to be oppressing Muslims. As described below, as BICKFORD further radicalized, he subsequently devoted himself to targeting U.S. officials and informed Brother-1 that he viewed Brother-1 as having "joined the ranks of my enemy." See *infra* ¶ 24(b).

fly to Jordan on or about December 12, 2022, but did not board that flight.

13. Based on my participation in this investigation and my review of law enforcement reports, I have learned that on or about December 13, 2022, the FBI conducted a voluntary interview of TREVOR THOMAS BICKFORD, the defendant. During that interview, BICKFORD stated, in substance and among other things, the following:

a. In or about May or June 2022, BICKFORD began reading the Quran and attending mosques, including a particular mosque in New Hampshire ("Mosque-1"). BICKFORD, however, felt as though the mosques were not adequate.

b. BICKFORD also began following various Imams on YouTube. BICKFORD also stated that he follows a particular Sheikh, but he appeared reluctant to discuss the Sheikh and claimed not to remember the Sheikh's name. Based on my training, experience, and participation in this investigation, and as described further below, I believe that BICKFORD was referring to the radical Islamic cleric Abu Muhammad al-Maqdisi.

c. BICKFORD reads a lot of Salafist material. Based on my training and experience, and as discussed further below, I know that Salafism is a movement within Sunni Islam that believes Muslims must live in strict accordance with Sharia law.

d. According to BICKFORD, several weeks earlier, he had purchased tickets to fly to New Delhi, India, from where he planned to fly to Afghanistan. BICKFORD stated that he intended to "ally" with the Taliban and convince them to help BICKFORD fight against the oppression of Muslims in Burma. BICKFORD claimed that he did not agree with the Taliban's use of violence against civilians, and also stated that he had no intention to join al Qaeda.

e. BICKFORD explained that he canceled his trip to Afghanistan in order to see Brother-1, who was coming to visit BICKFORD. BICKFORD stated that he was likely going to rebook travel abroad the following week. BICKFORD also expressed some concerns that going to Afghanistan was too dangerous and stated that he was considering traveling to Jordan to study under a particular Sheikh, whom he refused to name, and to attend an Islamic religious school. Based on my training, experience, and review of publicly available information, I know that al-Maqdisi is Jordanian.

f. When asked about his crossbow, BICKFORD stated that he was training with it in order to fight in the jungles of Burma. BICKFORD also stated that he would bring camping gear, among other things, if he traveled to the Middle East.

14. Based on my participation in this investigation and my conversations with other law enforcement officers, I know that on or about January 1, 2023, following the New Year's Eve attack, in the course of executing a judicially authorized search warrant at the Maine residence where TREVOR THOMAS BICKFORD, the defendant, had been living, law enforcement officers recovered, among other things, a crossbow from the garage of the residence.

15. Based on my review of law enforcement reports and conversations with other law enforcement officers who interviewed Brother-1, I have learned, among other things, that in or about mid-December 2022, after TREVOR THOMAS BICKFORD, the defendant, had decided to travel to the Middle East and around the time that he was interviewed by the FBI, BICKFORD told Brother-1 that BICKFORD was scared that he was going to go to federal prison.

16. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of physical evidence recovered in the course of this investigation, I have learned, among other things, that in or about early December 2022, TREVOR THOMAS BICKFORD, the defendant, left handwritten notes at Mosque-1 for the members of Mosque-1. One of BICKFORD's notes stated: "Dear brothers and sisters, I fear for you a day when no repentance will be accepted. You are not upon the saved path. If you are sincere in your devotion to Allah (Subhanahu Wa ta'ala) then reject democracy, and openly declare your enmity and hatred for the kuffar and mushrikeen. Sheikh Abu Muhammad Al Maqdisi is guided aright and I highly encourage you to read his book entitled Millat Ibrahim. May Allah, Subhanahu wa ta'ala have mercy on you[.]" BICKFORD signed the note, "Abdullah Thomas Bickford."

17. Based on my participation in this investigation, my training and experience, and my conversations with other law enforcement officers, as well as my review of law enforcement reports, I know that:

a. "Kuffar" and "mushrikeen"—terms used by TREVOR THOMAS BICKFORD, the defendant, in his note to members of Mosque-1 described above—are pejorative terms commonly used by radical Islamic extremists to refer to non-believers as infidels and polytheists, respectively.

b. Al-Maqdisi—whom BICKFORD embraced in his note encouraging members of Mosque-1 to “reject democracy, and openly declare [their] enmity and hatred for the kuffar and mushrikeen”—is a prominent cleric based in Jordan who preaches a militant form of Islam and opposes any type of democracy. Al-Maqdisi is credited with popularizing many of the contemporary themes of radical Islam, and was the mentor of Jordanian jihadist Abu Musab al-Zarqawi, the initial leader of al Qaeda in Iraq. Al-Maqdisi is considered to be one of the most influential living jihadi theorists. Al-Maqdisi has been imprisoned in Jordan multiple times, including on terrorism charges for conspiring to attack American targets in Jordan.

c. Al-Maqdisi is a scholar and proponent of violent Salafi Islam, which teaches that most people on Earth, including most Muslims, are disbelievers and that true Muslims must fight and kill disbelievers. For followers of this violent extremist strand of Islam, Sharia law is the only acceptable form of governance, and any government ruling by something other than Sharia law and any person endorsing or participating in any such government must be violently opposed and unseated.

d. Al-Maqdisi’s radical teachings further promote the belief that by participating in a governmental system not run in accordance with Sharia law, all employees of such a government are polytheists, which is an unforgivable sin that may be punished by bloodshed.

e. Al-Maqdisi has published various materials that promote his teachings, including a book titled *Millat Ibrahim*, which is widely considered his most influential work, and the book that BICKFORD encouraged members of Mosque-1 to read in the above-described note. Based on my review of *Millat Ibrahim*, I have learned that the book encourages, among other things, waging jihad against disbelievers and governments ruled by disbelievers and using swords on the heads of disbelievers, and criticizes police and other agents of “man-made” governments as disbelievers and promoters of polytheism.

#### **BICKFORD’s New Year’s Eve Attack**

18. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of law enforcement reports, including reports reflecting a *Mirandized* interview of TREVOR THOMAS BICKFORD, the defendant, on or about January 1, 2023, I know that, as detailed further below, BICKFORD ultimately decided that he would not travel to the Middle East as initially planned, and that he would instead wage jihad in

the United States. As part of executing that mission, on or about December 31, 2022, during the height of the New Year's Eve celebration in New York City, BICKFORD attacked multiple on-duty law enforcement officers—specifically, three NYPD officers—in the vicinity of Times Square.

19. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of law enforcement reports, I have learned the following, among other things, about the joint federal-state law enforcement operation responsible for securing New York City's annual New Year's Eve celebration in and around Times Square:

a. New York City's annual New Year's Eve celebration in and around Times Square is a unique, special event that attracts millions of residents and visitors each year. The tradition of celebrating New Year's Eve in Times Square began as early as 1904, with the ceremonial ball drop debuting in 1907 from atop One Times Square. Since then, the event has grown to become one of the largest celebrations in the world. Each year, in addition to the millions of civilians who attend the festivities in and around Times Square, there is a large national and international media presence during the evening up until the time of the ball drop. An estimated one billion people worldwide watch the event on television, mobile applications, and online streaming videos. Militant jihadist groups have previously identified the Times Square New Year's Eve celebration as a target for terrorist attacks in publicly disseminated propaganda materials.

b. Protecting the civilians who attend this special event requires and involves the coordination, collaboration, and mutual assistance of multiple federal and state law enforcement agencies, including the FBI and NYPD. Those agencies, including the FBI and NYPD, work together and assist each other in the performance of their respective duties, in a collective effort to ensure a safe Times Square New Year's Eve celebration.

c. The FBI's involvement in working to ensure a safe New Year's Eve celebration arises in part from its mission to protect and defend the United States against terrorist threats, and to uphold and enforce the criminal laws of the United States. The NYPD's involvement in working to ensure a safe New Year's Eve celebration arises in part from its mission to enforce the law, preserve peace, protect the people, reduce fear, and maintain order in New York City. During the annual New Year's Eve celebration in and around Times Square, including on the night of December 31, 2022, the FBI and NYPD engage in an extensive, closely coordinated,

joint effort to ensure the security of this special event, which involves the FBI and the NYPD each working to assist the other agency in the performance of their respective official duties.

d. This joint FBI-NYPD effort to ensure a safe New Year's Eve celebration in and around Times Square on December 31, 2022, included, among other things: multiple joint briefings and coordinated, jointly developed operational plans; the integration of various NYPD and FBI units and personnel for the purpose of optimizing the FBI-NYPD interagency coordination, information sharing, and mutual assistance, which enables the FBI agents and NYPD officers to jointly carry out their protective and responsive functions during the event; and the physical deployment of a large number of both FBI agents and NYPD officers, in coordinated fashion and often in close proximity, throughout New York City, including, in particular, the area in and around Times Square, which for purposes of the joint FBI-NYPD operation on New Year's Eve encompassed the area of 52nd Street and Eighth Avenue, *i.e.*, the location where TREVOR THOMAS BICKFORD, the defendant, carried out his attack. That location of 52nd Street and Eighth Avenue was an access checkpoint at which spectators could gain entry to the events in Times Square, and both FBI and NYPD personnel were deployed in the area of the checkpoint, including the three officers whom BICKFORD attacked. One component of the joint FBI-NYPD operation on New Year's Eve is that if and when an NYPD officer detailed to that operation in and around Times Square—such as the officers attacked by BICKFORD—relays information about a potential terrorist threat or incident, that information is reported to the command post at the FBI's JTTF, so that the FBI can carry out its mission to prevent, investigate, and respond to terrorist threats and attacks. Indeed, on the night of December 31, 2022, following BICKFORD's jihadist attack, information reported by NYPD officers from the scene of the attack was immediately relayed to the FBI's JTTF, enabling FBI agents to respond to and investigate the attack.

20. Based on my participation in this investigation, my review of law enforcement reports, surveillance camera footage, NYPD officer body-worn camera footage, information from eyewitnesses, and my conversations with other law enforcement officers, I have learned, among other things, the following:

a. On or about New Year's Eve, December 31, 2022, at approximately 10:10 p.m., in the vicinity of 52nd Street and Eighth Avenue, near the New Year's Eve celebration in Times Square, TREVOR THOMAS BICKFORD, the defendant, attacked multiple NYPD officers who were detailed to the above-described federal-state interagency operation to protect the area of the New Year's Eve

celebration. BICKFORD approached Officer-1, declared "Allahu Akbar,"<sup>3</sup> and struck Officer-1 with a kukri—that is, a large, curved knife similar to a machete. The blade of the kukri was over one foot long. BICKFORD then attacked Officer-2 and Officer-3, striking each of them in the head with the kukri. After being attacked, one of the officers was able to create some distance between himself and BICKFORD, and shot BICKFORD in the right shoulder, thereby stopping the attack. BICKFORD was then taken into NYPD custody.

b. The attack was captured on officer body-worn camera footage. Below are still shots from that footage showing BICKFORD perpetrating the attack (first image) and striking one of the officers with the kukri (second image):



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<sup>3</sup> Based on my training, experience, and participation in this investigation, I know that "Allahu Akbar" is an Arabic phrase meaning "God is great," which other radical Islamic extremists have similarly proclaimed while carrying out terrorist attacks.



c. BICKFORD wounded the three officers in his attack, and all three officers had to be taken to a hospital for treatment. One officer suffered ringing in his ears, pain to the back of his head, and a laceration, where BICKFORD had struck him with the handle of the kukri. Another officer suffered a skull fracture and laceration on the back of his head and received stitches. The third officer suffered lacerations to his forehead and also received multiple stitches.

d. The kukri used by BICKFORD in the attack, depicted below, was recovered by law enforcement from the scene of the attack:



21. Based on my conversations with other law enforcement officers and my review of law enforcement reports, I have learned that, after receiving treatment at a hospital, TREVOR

THOMAS BICKFORD, the defendant, was cleared by medical personnel to be interviewed, waived his *Miranda* rights, and spoke with law enforcement agents. During the interview, BICKFORD stated, in substance and among other things, the following:

a. In the days leading up to the New Year's Eve attack, BICKFORD traveled from Maine to New York City, where BICKFORD checked into a hotel. While in New York City, BICKFORD decided not to travel overseas to wage jihad as originally planned, and instead to commit jihad in New York City.

b. On the night of December 31, 2022, prior to the attack, BICKFORD walked around Times Square "trying to figure out the right time to kill." BICKFORD spent a long period of time praying in the vicinity of Times Square before carrying out the attack.

c. BICKFORD identified an NYPD officer who was directing traffic and waited until the officer was isolated from civilians and other police officers. BICKFORD started reciting verses from the Quran in his head to "hype himself up." BICKFORD took out the kukri from his backpack, declared "Allahu Akbar," and attacked the officer.

d. After attacking that officer, BICKFORD charged at another officer, and tried to forcibly remove that officer's firearm from the officer's holster. BICKFORD had his hand on the handle of the firearm but was unable to remove it from the holster. BICKFORD was then shot in the shoulder, stopping his attack.<sup>4</sup>

e. When asked why he decided to attack the first officer, BICKFORD stated that the officer was a man in uniform who had a weapon; that all men of military age were his targets; that no one can work for the U.S. Government and be a true Muslim, because the U.S. Government supports Israel; and that he wanted to kill as many of these targets as he could. BICKFORD intended to die in the attack, in an effort to achieve martyrdom. BICKFORD believed his attack was unsuccessful, because he did not kill any officers, and he did not die himself.

f. BICKFORD stated that he acted alone in carrying out the attack, and that he was not affiliated with or working on behalf of any terrorist group.

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<sup>4</sup> While BICKFORD only described attacking two NYPD officers during the interview, as described above, BICKFORD in fact attacked and wounded three officers with the kukri.

g. BICKFORD stated that on the night of the attack, he took the subway to Times Square. When BICKFORD got off the subway in that area, prior to the attack, he abandoned a large hiking backpack ("Bag-1") that he was carrying because he was worried that plain-clothed police officers were following him.

22. Based on my participation in this investigation and my conversations with other law enforcement officers, I know that shortly after the attack, law enforcement officers recovered Bag-1 near Times Square. I have reviewed the items in Bag-1, which contained, among other things, the following:

a. Multiple books relating to Islam, including at least two copies of the Quran; and

b. Camping gear, including a survival kit, and warm clothing, including dark gloves and a hat.

23. Based on my review of one of the books recovered from Bag-1 carried by TREVOR THOMAS BICKFORD, the defendant, I have learned, among other things, that certain portions of that book were highlighted, including a passage that states "Fight in the Name of Allah and in the Cause of Allah. Fight against those who do not believe in Allah. Wage a holy war."

24. Based on my participation in this investigation and my conversations with other law enforcement officers, I have also learned, among other things, the following:

a. Shortly after the New Year's Eve attack, law enforcement recovered a second bag ("Bag-2") from the scene of the attack that TREVOR THOMAS BICKFORD, the defendant, had been carrying.

b. Bag-2 contained, among other items, a copy of al-Maqdisi's book promoting jihad, *Millat Ibrahim*, and a journal (the "Journal"), which I have reviewed, with BICKFORD's name and phone number written inside. The Journal contains an entry dated December 31, 2022 (*i.e.*, the day of the attack), in which BICKFORD stated that "this will likely be my last entry, insha'allah [God-willing]." The entry also stated to whom BICKFORD wanted to bequeath his possessions. At the end of the entry, BICKFORD explained that he wanted a traditional Muslim burial and did not want to be buried in the "land of the Kuffar." Also in this journal entry, BICKFORD addressed Brother-1, a soldier in the U.S. military, stating that BICKFORD had "no kind words" for Brother-1, since Brother-1 had "joined the ranks of my enemy."

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of TREVOR THOMAS BICKFORD, the defendant, and that the defendant be arrested and imprisoned or bailed, as the case may be.

S/ by the Court with permission

JACK AMARO  
Special Agent  
Federal Bureau of Investigation

Sworn to me through the transmission of this Affidavit by reliable electronic or telephonic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1, this

10th day of January, 2023



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HONORABLE ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK