

Finally, the defendant's motivation is not in question here—he stated that he had pledged his allegiance to ISIS and that he was inspired by their attacks. The defendant also sent bombing videos and screenshots of instructions on how to use knives, which were produced by ISIS. In the end, his motive is clear: he wanted to conduct an attack imminently and he was “ok” with dying.

An individual like the defendant, who has carefully considered a terrorist attack in Queens, completed multiple reconnaissance trips to target locations, purchased a knife and supplies to aid in his plan, and stated that he wanted to learn how to use a knife properly so that he could “move and strike swiftly, all for the sake of Allah” presents a grave danger to the community that no set of release conditions can mitigate.

B. The Weight of the Evidence

The weight of the evidence in this case is overwhelming. The defendant was caught attempting to acquire a knife and other items that he could use in a lone wolf attack. Moreover, the defendant's multiple communications with undercover law enforcement agents, which are summarized extensively in the complaint, show the defendant's support for ISIS and the defendant's scheme to commit an attack in support of ISIS. The strength of the case against the defendant gives him a significant motive to flee rather than be convicted at trial. See 18 U.S.C. § 924(a)(1)(B).

C. The Defendant's History and Characteristics

The defendant's history and characteristics confirm he is a substantial risk of flight and danger to the community. As noted above, the defendant has expressed his support for acts of terrorism and ISIS, as well as his interest in committing an attack in the United States. Although he has some ties to this district—he lives with his parents in Queens—the government is not aware of any other significant relationships that the defendant has that might mitigate against an incentive to flee or to engage in conduct dangerous to the community. The defendant also has family in Pakistan, providing him a specific place to which to flee.

D. The Nature and Seriousness of the Danger to the Community Posed by Release

As discussed above, the defendant poses an extreme risk to the community. He has shown an interest in conducting a violent attack in New York City and taken concrete steps to further that plan. Indeed, the instant charge itself involved the defendant attempting to conceal his identity and to evade law enforcement detection (by purchasing gloves and a mask to wear during the attack) presumably so that he could commit future attacks.

IV. Conclusion

For all of the foregoing reasons, the defendant should be detained pending trial. The defendant is charged with a serious offense, and the facts surrounding that offense show the defendant's willingness to commit even more serious offenses. The government respectfully submits that no condition or combination of conditions will assure the safety of the community, the defendant's return to court, or his compliance with the Court's directives, and the Court should thus enter a permanent order of detention pending trial.

Respectfully submitted,

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