

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	Criminal Case No. 1:16-cr-042
v.	)	
	)	Hon. Leonie M. Brinkema
ARDIT FERIZI.	)	
a/k/a “Th3Dir3torY”	)	Sentencing Hearing: Sept. 23, 2016
	)	
Defendant.	)	

**POSITION OF THE UNITED STATES WITH RESPECT TO SENTENCING**

The United States of America, by and through its attorneys, Dana Boente, United States Attorney for the Eastern District of Virginia, Brandon L. Van Grack, Special Assistant United States Attorney, and Gregory R. Gonzalez, Trial Attorney for the National Security Division’s Counterterrorism Section, in accordance with 18 U.S.C. § 3553(a) and the United States Sentencing Commission, Guidelines Manual (“U.S.S.G.” or the “Guidelines”) § 6A1.2, files this Position of the United States With Respect to Sentencing of the defendant, Ardit Ferizi. The United States submits that a sentence of 300 months (25 years) of imprisonment would be sufficient and not greater than necessary to satisfy the factors set forth in 18 U.S.C. § 3553(a).

**I. FACTUAL BACKGROUND**

On June 15, 2016, the defendant pleaded guilty to two counts in the Indictment: (i) providing material support to a designated foreign terrorist organization, in violation of 18 U.S.C. § 2339B (Count Two), and (ii) accessing a computer without authorization and obtaining information, in furtherance of his provision of material support to a designated foreign terrorist organization, in violation of 18 U.S.C. § 1030(a)(2)(C) (Count Three). The charges and plea stem from the defendant’s actions, beginning in April 2015, in support of the Islamic State of

Iraq and the Levant (“ISIL”), a foreign terrorist organization that has called for attacks against United States citizens, including members of the military. The defendant supported ISIL in multiple ways, on multiple occasions, and has indefinitely put the lives of approximately 1,300 United States military members and government employees at risk.

The defendant provided ISIL with private information from hundreds of United States citizens to facilitate ISIL’s efforts to spread its terror across the globe. On September 21, 2014, as ISIL metastasized in Syria and Iraq, one of its leaders, now-deceased spokesperson Abu Muhammad al-Adnani, called for attacks against citizens—civilian or military—of the United States and other countries participating in the United States-led coalition against ISIL. Thereafter, ISIL members, including now-deceased ISIL recruiter Junaid Hussain (“Hussain”), heeded Adnani’s call by facilitating attacks. In order to carry out ISIL’s plan of “crowdsourcing” terrorism, Hussain needed personally identifiable information (“PII”) to disseminate to ISIL supporters throughout the world. For example, on March 20, 2015, Hussain, under the name of the Islamic State Hacking Division (“ISHD”), posted a “kill list” that included the names and addresses of 100 United States military members.

With complete awareness of ISIL’s expanding terrorist aims, the defendant began providing support for ISIL in April 2015. At first, he supported ISIL by administrating a website that hosted ISIL videos, Penvid.com. An archived copy of Penvid.com dated May 23, 2015, shows that it contained ISIL videos and included a drop-down menu with the name “Dabiq,” which is the name of ISIL’s official English-language magazine.<sup>1</sup> See Attachment A. The defendant knew that ISIL videos were being posted on his website, and that his website served as

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<sup>1</sup> The archived record came from the website [www.archive.org](http://www.archive.org), which offers a service called the Wayback Machine. The Wayback Machine is a digital archive of the World Wide Web and other information on the internet.

a force multiplier for ISIL's propaganda machine. On May 6, 2015, the defendant received an email stating that his website had been shut down because it was "being used as a website by a terrorist organization for the promot [sic] // of violence and criminal activity." Attachment B.

The defendant received numerous messages over Twitter from persons who were against ISIL, knew that he administered the website, and questioned why he was supporting ISIL. The defendant repeatedly defended ISIL and his website in these communications. For example, when asked about the beheadings by the now-deceased ISIL executioner known as Jihadi John, the defendant replied that ISIL "never kill [sic] someone without reason." Id. During a different exchange, the defendant was asked whether he knew about a group "calling itself the Islamic State Hacking Div, [which] posted the names, home addresses and photos of 100 American service member families." In response, Ferizi indicated the posting was justified because the U.S. military "killed peoples [sic] in Iraq and Syria." Id.

Although the website amplified ISIL's message, the defendant wanted to do more. So he began providing information to facilitate specific ISIL attacks. As described in the Statement of Facts, on April 26, 2015, the defendant provided ISIL with what appeared to be PII belonging to people living in the United States and abroad. One of those ISIL members was Tariq Hamayun, also known as "Abu Muslim Al-Britani," a Syria-based associate of Hussain. When speaking with Hamayun over Twitter, the defendant said that the PII belonged to people in "kuffar<sup>2</sup> countrys [sic] which attacking islamic state." Id. At the end of this exchange, Hamayun asked the defendant to "come and join us in the Islamic state," to which the defendant responded, "inshAllah," which in Arabic means, "If Allah wills it." Id.

Less than two months later, the defendant outdid himself. On June 13, 2015, he gained

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<sup>2</sup> Kuffar is a derogatory term used to refer to non-Muslims.

system administrator-level access to a server that maintained the website for an Illinois company (“Victim Company”) that sold goods to customers in the United States and abroad.<sup>3</sup> The server contained databases with PII belonging to tens of thousands of the Victim Company’s customers, which included United States military and other government personnel. The defendant searched for, accessed, and obtained customer information for tens of thousands of customers whose information was retained on the server, including phone numbers, e-mail addresses, locations, and account passwords. He subsequently culled the PII belonging to United States military (designated by “.mil”) and other government personnel (designated by “.gov”). In total, he obtained PII belonging to approximately 1,300 United States military and other government personnel, including persons located here in the Eastern District of Virginia.

Immediately after extracting the PII for the 1,300 United States military and other government personnel, the defendant provided the information to ISIL. He reached out to Junaid Hussain, the ISIL recruiter and attack facilitator discussed above, who used the *nom de guerre* “Abu Hussain al-Britani.” The defendant knew that Hussain was a member of ISIL and was actively engaged in supporting ISIL. The defendant told Hussain how he obtained the information, named the company it came from, and stated that it contained almost 1,400 military and government email accounts. Attachment C. Hussain twice exclaimed that releasing this information would “hit them hard,” and each time the defendant responded “yes inshaAllah.” Id. The defendant and Hussain also discussed how the information would be released. Hussain, referencing the March 2015 release of PII for 100 U.S. military members, stated that “we will make like a message inshAllah // like u know the hitlist I made // with addresses // we will make message to kuffar and release the .mil and.gov [sic].” Id. Hussain further indicated that the

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<sup>3</sup> The Victim Company suffered quantifiable losses of at least \$53,975. See PSR at ¶24.

information would be released by the “Islamic State Hacking Division.” Without hesitation, Ferizi agreed with Hussain’s plans. Id.

On August 11, 2015, Hussain, acting in the name of the Islamic State Hacking Division, sent communications over Twitter that contained a document with the PII of the 1,300 United States military and government personnel that the defendant had stolen from the Victim Company and provided to Hussain. The beginning of the document warned the “Crusaders” who were conducting a “bombing campaign against the muslims:”

we are in your emails and computer systems, watching and recording your every move, we have your names and addresses, we are in your emails and social media accounts, we are extracting confidential data and passing on your personal information to the soldiers of the khilafah, who soon with the permission of Allah will strike at your necks in your own lands!

Shortly after sending that tweet, Hussain received a message from another ISIL supporter asking about the defendant’s whereabouts. Hussain explained that the defendant had “just [been] busy lately” and that “i work with that brother akhi // hes in [sic] our team.” Attachment D.

On September 15, 2015, Malaysian authorities detained the defendant as he was attempting to leave the country. On October 12, 2015, Malaysian authorities provisionally arrested him at the request of the United States. The defendant was extradited to the United States on January 22, 2016.

## **II. STANDARDS GOVERNING SENTENCING**

The standards governing sentencing are well-established. In United States v. Booker, 543 U.S. 220 (2005), the Supreme Court rendered the Sentencing Guidelines purely advisory, and emphasized that a sentencing court must consider both the Guidelines and the 18 U.S.C. § 3553(a) factors when making a sentencing decision. Id. at 264; see also United States v.

Kimbrough, 552 U.S. 85 (2007) (stating that “the Guidelines, formerly mandatory, now serve as one factor among several courts must consider in determining an appropriate sentence”). In Gall v. United States, 552 U.S. 38, 128 S. Ct. 586 (2007), the Supreme Court instructed that the sentencing court should calculate the sentencing Guidelines range, permit the government and the defendant “an opportunity to argue for whatever sentence they deem appropriate,” consider all of the § 3553(a) factors, and finally pronounce a sentence taking into account all of the relevant factors. Id. at 596-97. The Gall Court further instructed that, in the event that the sentencing court decides to impose a variance sentence, the court “must consider the extent of the deviation and ensure that the justification is sufficiently compelling to support the degree of the variance.” Id. (noting that a “major departure should be supported by a more significant justification than a minor one.”).

Applying these standards, the Fourth Circuit has concluded that a sentencing court must: “(1) properly calculate the Guideline range; (2) allow the parties to argue for the sentence they deem appropriate and determine whether the § 3553(a) factors support the sentences requested by the parties; and (3) explain its reasons for selecting a sentence.” United States v. Simmons, 269 Fed. Appx. 272, 2008 WL 681764, at \*1 (4th Cir. March 11, 2008) (citing United States v. Pauley, 511 F.3d 468, 473 (4th Cir. 2007)). When “rendering a sentence, the district court must make and place on the record an individualized assessment based on the particular facts of the case.” United States v. Cuthrell, No. 12-4077, 2012 WL 3643677, \*1 (4th Cir. Aug. 27, 2012) (citing United States v. Carter, 564 F.3d 325, 328 (4th Cir. 2009)). Ultimately, the court “must state in open court the particular reasons supporting its chosen sentence.” Carter, 564 F.3d at 328 (quoting 18 U.S.C. § 3553(c)). Courts “are not left with unguided and unbounded sentencing discretion.” United States v. Green, 436 F.3d 449, 455 (4th Cir. 2006). Instead, at

sentencing a court “must first calculate the Guidelines range.” Nelson v. United States, 555 U.S. 350, 351 (2009); see also United States v. Hughes, 401 F.3d 540, 546 (4th Cir. 2005) (holding that a sentencing court is still required to “consult [the] Guidelines and take them into account when sentencing” (quoting Booker, 543 U.S. at 264)).

### **III. SENTENCING CONSIDERATIONS**

#### **A. Acceptance of Responsibility**

In accordance with Section 6A1.2 of the Guidelines and Policy Statements and this Court’s policy regarding Guidelines sentencing, the United States hereby represents that it has reviewed the United States Probation Office’s presentence report (“PSR”) prepared in this matter. The United States moves this Court, pursuant to U.S.S.G. § 3E1.1(b), to grant the defendant an additional one-level reduction in the offense level for acceptance of responsibility, if the defendant receives a two-level reduction for acceptance of responsibility. The government states that the defendant has assisted authorities in the investigation and prosecution of his own misconduct by timely notifying the United States of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate their resources efficiently.

#### **B. Sentencing Guidelines**

The government generally agrees with the Probation Office’s Guidelines calculations. The Probation Office calculated that the defendant’s Total Offense Level is 40 and Criminal History Category is VI, resulting in a recommended Guideline sentence of 360 months to life. Since the statutory maximum for Count Two (18 U.S.C. § 2339B) is 240 months and Count Three (18 U.S.C. § 1030(a)(2)(C)) is 60 months, the sentence is limited by statute to 300 months (25 years).

*i. Count Two: Providing Material Support to a Terrorist Organization*

The parties agree that the base offense level for Count Two is 26 pursuant to Section 2M5.3(a). As stated in the Plea Agreement, the parties also agree that Section 3A1.4(a) applies because the defendant's actions involved a federal crime of terrorism, which increases the offense level by 12 levels and automatically raises the defendant's criminal history to Category VI. *See* Plea Agreement (Doc. 35) at 3-4.<sup>4</sup> In addition to these uncontested Guideline provisions, the Probation Office recommends that two other provisions apply to Count Two, Sections 2M5.3(b)(1) and 3A1.2, which together would increase the offense level by five levels. The government agrees with the Probation Office that both provisions apply in this case.<sup>5</sup>

- a. Section 2M5.3(b)(1) applies because the defendant provided material support to ISIL with the intent, knowledge, and reason to believe it would be used to assist in the commission of a violent act.*

The Probation Office recommends, and the government agrees, that pursuant to 2M5.3(b)(1)(E) the offense level for Count Two should increase by two levels because the

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<sup>4</sup> The government notes that Section 4A1.3(b) should not be applied to this case. Under that section, a court can depart downward if a defendant's criminal history category substantially over-represents the seriousness of the defendant's criminal history or likelihood that he will commit other crimes. First, under the Plea Agreement, both parties have recommended that the defendant's criminal history is Category VI, as a result of the application of Section 3A1.4(b). Second, and more importantly, the departure contemplated under Section 4A1.3(b) should not be applied to cases where the terrorism adjustment under Section 3A1.4(b) has been applied, such as here. Pursuant to Section 3A1.4(b), the Guidelines mandate that the criminal history category in this case is Category VI, due to the serious nature of terrorism offenses. That section states that if the offense involved or was intended to promote terrorism, the criminal history "shall be" Category VI. The criminal history category determination in terrorism cases is thus not based on the defendant's actual criminal history or likelihood of committing another crime, which are the enumerated bases for a downward departure under Section 4A1.3. Rather, the sole consideration is the seriousness of terrorism. Section 4A1.3(b) is intended for cases when the criminal history category has been determined by calculating the defendant's actual criminal history, and that category does not accurately reflect the seriousness of the defendant's conduct. Here, no such calculation was used to determine the criminal history category.

<sup>5</sup> In the Plea Agreement, the government noted its belief that both provisions apply and its intent to argue at sentencing that they apply.



defendant provided material support to ISIL with the intent, knowledge, or reason to believe it would be used to commit or assist in the commission of a violent act. When the defendant provided ISIL with the PII for 1,300 military members and other government employees, he intended, knew, or, at minimum, had reason to believe, that the information would be used to assist in the commission of a violent act. As the defendant admitted in the Statement of Facts, he was fully aware that ISIL was a terrorist organization that engaged in terrorist activity. He knew that ISIL targeted and killed civilians of countries militarily opposed to ISIL. When he communicated with people who confronted him about ISIL's violent acts, such as beheadings, he defended those acts. He also willingly administered a website that hosted ISIL's violent videos and propagated their justifications for that violence.

Fully aware of ISIL's desire to target the United States, the defendant searched for PII belonging to U.S. persons and provided that information to ISIL. His intent is clear from the facts. Once the defendant identified customer information from the Victim Company, he began looking for and culling information for U.S. military members and government employees, knowing full well that ISIL was seeking such information. His intent was made abundantly clear when, immediately upon culling the military and government personnel information, he shared it with a notorious ISIL recruiter and facilitator, Junaid Hussain.

The defendant's knowledge of what ISIL would use the information for is evidenced by the information itself and by ISIL's previous use of that type of information: to disseminate a kill list. What other purpose would ISIL have with the names, addresses, and phone numbers of U.S. military members and government employees if not to locate and target them? Hussain indicated that they would release the PII, just like the "hitlist" Hussain had released months earlier. A "hitlist" does not refer to propaganda; it describes a list of people to be targeted and attacked.

Hussain also twice stated that ISIL would use this information to “hit them hard.” The defendant expressed his complete agreement with Hussain. See Attachment C.

Accordingly, as the Probation Office recommends, the offense level for Count Two should increase by two levels pursuant to Section 2M5.3(b)(1)(E).

*b. Section 3A1.2(a) applies because the victims were government officers and employees.*

The government also agrees with the Probation Office that pursuant to Section 3A1.2(a) the offense level for Count Two should increase by three levels because the victims were government officers and employees and the defendant targeted those victims because of their status. The defendant searched for and isolated PII for government employees, including members of the military and civilians. The defendant only discussed releasing the PII for those government employees. The defendant agreed with Hussain that they would “hit” those government employees “hard.” When ISIL released the information, they instructed their “soldiers” to “strike at [the] necks” of those government employees. Those government employees must now live in constant fear that a member of ISIL will use that information to find and harm them.

There is no dispute that the defendant targeted government employees. And there can be no dispute that those government employees were harmed. Therefore, Section 3A1.2(a) applies.

*ii. Count Three: Accessing a Protected Computer Without Authorization and Obtaining Information*

The United States generally agrees with the Probation Office’s offense level calculation for Count Three. The parties agree that the base offense level for Count Three is six pursuant to Section 2B1.1(a)(2). Under the Plea Agreement, the parties also recommend the following offense level increases: six-level increase since the loss sustained by victims exceeds \$40,000 (Section 2B1.1(b)((1)(D))); two-level increase since the offense involved unauthorized public

dissemination of personal information (Section 2B1.1(b)(17)); two-level increase since the defendant used a special skill to commit the offense (Section 3B1.3).

The parties also agree that a three-level upward adjustment applies pursuant to Section 3A1.2 since the victims were government employees, whereas the Probation Office recommends that this upward adjustment only be applied to Count Two. The government's disagreement with the Probation Office stems from whether the government employees can also be considered victims of the defendant's unauthorized computer intrusion and theft of information (the government and Probation Office agree that government employees were victims of the defendant's provision of material support to ISIL). There is no dispute that the Illinois company was a victim when the defendant gained unauthorized access to its server and took PII from that server. The government maintains that customers of that company whose PII the defendant stole were also victims. That PII belonged to the company *and* to the customers. In many ways, the PII was more valuable to the customers than to the company. By removing the PII from the company's server, the defendant exposed the customers to all sorts of harm, be it fraud or, as in this case, physical injury. Many of those customers were government employees and officers. Moreover, the harm to those government employees and officers was real. Those targeted individuals must live in a perpetual state of fear that they may be attacked. The charges in Count Three state that the defendant took the PII to further his support of ISIL. The defendant specifically targeted the PII of government employees and officers. Since the defendant's theft of PII harmed, and was intended to harm, government employees and officers, Section 3A1.2(a) should be applied to Count Three.

The Probation Office also recommends that there be a victim related adjustment to Count Three pursuant to Section 3A1.4(a) since the unauthorized computer intrusion and theft of

information was intended to promote a federal crime of terrorism, which would add 12 levels to the offense level. The government agrees. In the Statement of Facts, the defendant admits that he gained unauthorized computer access and obtained information from that access “in furtherance of . . . the criminal act of . . . providing support to ISIL.” Statement of Facts at ¶2. The defendant’s admission virtually mirrors the language of Section 3A1.4(a). Accordingly, 12 levels should be added to the Guidelines calculation for Count Three.

### **C. 18 U.S.C. Section 3553(a) Factors**

After calculating the appropriate Guidelines range, “the court must ‘determine whether a sentence within that range . . . serves the factors set forth in § 3553(a) and, if not, select a sentence [within statutory limits] that does serve those factors.’” United States v. Moreland, 437 F.3d 424, 432 (4th Cir. 2006) (quoting Green, 436 F.3d at 455). Title 18, United States Code, Section 3553(a)(1) provides that, in determining a sentence, courts must consider the nature and circumstances of the offense, as well as the history and characteristics of the defendant. Additional factors outlined in Section 3553(a)(2) include the need for the sentence to reflect the seriousness of the offense, to promote respect for the law, to provide just punishment for the offense, to afford adequate deterrence to criminal conduct, and to protect the public from further crimes of the defendant. 18 U.S.C. § 3553(a)(2)(A)-(C).

### **D. Argument**

The recommended Guidelines sentence of 25 years of imprisonment appropriately reflects the seriousness of the offense, the ongoing danger posed to 1,300 military members and government employees, the critical need to deter this type of conduct, and the defendant’s clear knowledge of and intent to commit the harms he inflicted.

*i. Seriousness of the Offense*

The defendant's actions have threatened the lives of over 1,300 military members and civilian government employees, and their families. Because of the defendant's actions, ISIL members now know the names of these victims, their affiliation with the U.S. government, and where they live, among other identifying information. The defendant also released passwords used by these 1,300 victims, which could be used by ISIL to uncover additional private information. This is not analogous to simply publishing information from Google. The PII that the defendant stole and released was not publicly available.

The threat to these 1,300 victims goes beyond the release of their private information. They have now been marked as enemies of ISIL. Any ISIL member or sympathizer in the United States looking for a target now has the information belonging to 1,300 individuals who ISIL has specifically marked for attack. The victims have a permanent target on their backs. While the defendant may not have pulled a trigger, he told members of ISIL where to shoot.

And the threat to these 1,300 victims has no end in sight. Because ISIL transmitted the PII over the internet, there is no way to know if the risk to these military members, civilian government employees, and their families, will ever end. It is not possible to permanently remove items from the internet, which means the private information of the victims that was released in this case will remain public. We do not know who or how many people downloaded and saved the PII, and when they may republish the information again. What we do know is that ISIL supporters have republished the PII provided by the defendant multiple times since August 11, 2015.

For instance, an individual is presently indicted in another district for transmitting and conspiring to transmit threatening communications in interstate commerce. The charges relate to

the individual re-tweeting PII belonging to two of the victims in this case along with the phrase, “Wanted to kill,” followed by the victims’ first and last names, city of residence, zip code, and phone number.

These 1,300 victims can never stop wondering whether someone will accept ISIL’s command to “strike at [their] necks.” One of the victims, a member of the military, perfectly captured this fear in his victim impact statement when he wrote, “I have to live constantly under the threat that someone might actually arrive at my residence and harm me or my family members.”

The defendant’s conduct is particularly reprehensible because he targeted people for their service to our country. In the United States we hold military members in the highest regard because of the sacrifices they make to defend our country and preserve our way of life. We also respect our public servants who spend their lives furthering the public good. The defendant chose the victims for those very reasons. By targeting them, the defendant and ISIL believed they were punishing persons responsible for the U.S. government’s national security policies, while impairing the ability of the U.S. government to carry out those policies. While we know that such actions only strengthen our country’s resolve, it shows the defendant’s depravity and the need for a significant sentence. A 25-year sentence would signal that, when given the opportunity, our justice system protects and serves the military members and civil servants, just as they spend their lives protecting and serving us.

*ii. Need for Adequate Deterrence*

The defendant’s actions represent an evolving terrorist threat that requires a substantial sentence to deter others from making the same choice. This case represents the first time someone has been arrested for or convicted of providing material support to a terrorist

organization through information that came from computer hacking. While the defendant will be the first terrorist hacker imprisoned for his actions, he is not the first or only terrorist hacker.

A significant sentence is necessary to signal that the defendant is more than a hacker – he is a terrorist. Hackers gain unauthorized access to computer systems and take information, often for pecuniary gain or ideological reasons. Stealing information to make money or to embarrass people is one thing; stealing it to harm or kill people is another. No court has yet had the opportunity to draw this line. A sentence of 25 years would make that line unambiguous.

In sentencing the first terrorist hacker convicted in the United States, this Court has the ability to send a clear message to other hackers who would likewise use their technical skills to support terrorist organizations. A sentence of 25 years would communicate that the United States has zero tolerance for hacking in support of terrorism.

*iii. Similarly Situated Defendants*

As noted above, this is the first instance in which a defendant has been convicted of using hacking skills to provide material support to a terrorist organization. The use of cyber tools to commit this act of terrorism does not diminish the significance of the defendant's crime. In September 2014, one of ISIL's leaders, Adnani, called for attacks against citizens of countries participating in the United States-led coalition against ISIL. Thereafter, ISIL members heeded Adnani's call, by facilitating attacks across the globe. In order to carry out ISIL's plan of "crowdsourcing" terrorism, Hussain needed PII that he could use to disseminate to ISIL supporters throughout the world. The defendant used his technical skills to provide ISIL with exactly that, knowing that his actions could have deadly consequences for the named victims.

This is Terrorism 2.0 where attacks are no longer centrally planned in musty caves in Afghanistan by an inner circle of terrorist operatives. Using social media, terrorist groups can

now achieve their goals from thousands of miles away, by supplying potential operatives with digital information about who to strike, where to strike, and when to strike. In this new landscape, the defendant's actions are equivalent to someone who facilitates an attack by scouting landmarks, reviewing security measures, or providing weapons, all of which are critical to the success of a terrorist operation. While there are no cases directly on point, the most analogous case occurred in this District. Zachary Adam Chesser was sentenced to 25 years for posting on a jihadist website the personal contact information of individuals who had joined the "Everybody Draw Muhammad Day" group on Facebook and encouraging jihadists to attack the writers of South Park, including highlighting their residence. See United States v. Chesser, 1:10cr395 (Doc. 51) (Feb. 24, 2011). The defendant's conduct here is arguably worse. While Chesser posted contact information for nine individuals, the defendant released more sensitive identifying information on 1,300 individuals.

*iv. Characteristics of the Defendant*

The defendant's characteristics likewise favor a sentence of 25 years. He is an intelligent and skilled hacker, who was fully aware of the consequences of his actions. According to the defendant, he has been a hacker since he was a young teenager. His skills and intelligence are manifested by the fact that he created and led a group of computer hackers called Kosova Hacker's Security ("KHS"). See PSR at ¶10. KHS was responsible for compromising private and government websites around the world, and has claimed responsibility for hacking more than 20,000 websites. Id. That skillset made the defendant particularly valuable to ISIL, as evidenced by Hussain's pride that he was on their "team."

The defendant was fully aware of what he was doing, and the consequences of those actions when he obtained and provided the victims' personal information to ISIL. As discussed



earlier, the defendant was well versed in ISIL's violence. He did not make a simple mistake. The defendant repeatedly supported and sought to support ISIL, in multiple ways. At first it was to help promote propaganda through ISIL videos. When that was not enough, he used his technical skills to obtain and provide information that ISIL was seeking.

There is no evidence that the defendant was coerced. In each instance of support, the defendant did so willingly. He gathered and provided ISIL with the PII for the 1,300 military members and government employees. He gathered customer information from the Victim Company, culled the PII for the military members and government employees, and provided it to ISIL. The defendant freely made each of those choices while behind a keyboard, thousands of miles from the war zone in Syria.

The defendant's previous brushes with the criminal justice system have failed to cure his criminal behavior. According to the defendant, he was arrested multiple times for cyber crimes in Kosovo. In each instance, he was promptly released because he apologized and was a juvenile. Records from the Kosovo government confirm that the defendant has been charged with multiple offenses in Kosovo. We are here, in part, because the defendant's previous arrests did nothing to deter him from committing cyber crimes.

The defendant should be imprisoned for the maximum available period of time that ensures he won't be able to use his specialized knowledge of hacking and computers to steal information for any purpose, particularly to cause physical harm. The defendant should be sentenced to 25 years' imprisonment.



## CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 2016, I filed the foregoing pleading with the Clerk of Court and will send an electronic copy of such pleading to counsel of record via email.

Respectfully submitted,

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# ATTACHMENTS

# ATTACHMENT A

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**FEATURED VIDEO: ISLAMIC STATE: "JOY OF THE MUSLIMS WITH THE VICTORIES OF THE MONOTHEISTS IN WILĀYAT AL-ĀNBĀR – WILĀY**

**TOP VIDEOS**

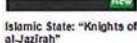
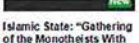
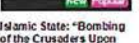
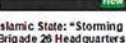





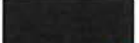
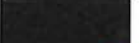

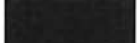
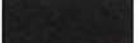
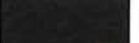
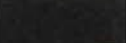


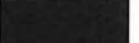
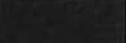
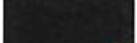
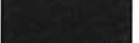
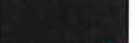
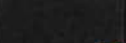
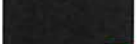
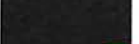
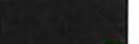
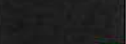

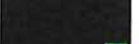
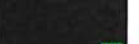
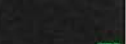
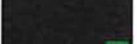
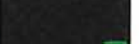
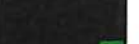
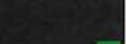
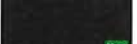
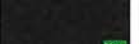






- Islamic State: "Bombing of the Crusaders Upon the Ordinary Muslims – Wilāyat al-Ānbār" 209 Views
- Islamic State: "Joy of the Muslims With the Victories of the Monotheists in Wilāyat al-Ānbār" 208 Views
- Islamic State: "Cubs of the Caliphate Brought Up in Their Environs – Wilāyat al-Ānbār" 104 Views
- Islamic State: "Joy of the Mujāhidīn With the Broken Defeat of al-Ānbār and Wilāyat al-Ānbār" 100 Views
- New video message from the Islamic State: "Aspects of the Battle on Wilāyat al-Ānbār" 93 Views

**VIDEOS BEING WATCHED RIGHT NOW**

- EXPOSED The Betrayal of Jabhat Nusra (Al) 7:55
- How the Islamic State came in to conflict with the Shaitat tribe 7:55
- Islamic state prisoners giving a speech about the way the live in Isis 7:55
- Reconciliation between People by Islamic State 7:55

**NEW VIDEOS**

- Sharf proof of the apostasy of the Islamic Front 27:17 New Added 19 minutes ago
- A Leader in ISIS converses with an old lady 7:55 New Added 19 minutes ago
- EXPOSED The Betrayal of Jabhat Nusra (Al Qaeda) to Islamic State 7:55 New Added 19 minutes ago
- English Translation of IS release The bombing of Crusaders on Muslims. 7:55 New Added 19 minutes ago
- How the Islamic State came in to conflict with the Shaitat tribe 7:55 New Added 19 minutes ago
- Islamic state prisoners giving a speech about the way the live in Isis 7:55 New Added 19 minutes ago
- Islamic Caliphate Repentance of Mansoor Ash-Shaitat 7:55 New Added 19 minutes ago
- Reconciliation between People by Islamic State 7:55 New Added 19 minutes ago
- Justice in The Islamic State 7:55 New Added 19 minutes ago
- Alhijrat - Nasheed tends to main pour l'algèbre 7:55 New Added 19 minutes ago
- في الجزيرة - فرقة المسلمين 7:55 New Added 19 minutes ago
- Answer of Muslims to the Threats of Apostates 03:56 New Added 19 minutes ago
- Answer of Muslims to the Threats of Apostates 7:55 New Added 19 minutes ago
- The Knights of Al-Jazeera Islamic State 7:55 New Added 19 minutes ago
- ندوة للعلماء المسلمين في دولة الامارات 7:55 New Added 19 minutes ago
- Islamic State: "Message to the Muslims in Somalia – Wilāyat al-Ānbār" 7:55 New Added 13 hours ago
- Dawlah message of support to media mujahids 7:55 New Added 13 hours ago
- Islamic State: "Until There Came To Them Clear Evidence" 7:55 New Added 1 day ago
- Islamic State: "Joy of the Mujāhidīn With the Broken Defeat of al-Ānbār" 7:55 New Added 1 day ago
- Islamic State's Shaykh Abū Usamah: "Condolence and Mourning for the Death of the Caliph" 7:55 New Added 1 day ago
- Islamic State: "Servers of the Subjects #1 – Wilāyat al-Ānbār" 7:55 New Added 1 day ago
- Islamic State: "Health Services in The Islamic State – Wilāyat al-Ānbār" 7:55 New Added 1 day ago
- Islamic State: "Cubs of the Caliphate Brought Up in Their Environs – Wilāyat al-Ānbār" 7:55 New Added 1 day ago
- Islamic State: "Preparation of the Terrorists for the Battle on Wilāyat al-Ānbār" 7:55 New Added 1 day ago

 <p>Islamic State: "Knights of al-Jazirah" Added 1 day ago</p>	 <p>Islamic State: "Gathering of the Monotheists With the Muslim Clans –" Added 1 day ago</p>	 <p>Islamic State: "Bombing of the Crusaders Upon the Ordinary Muslims –" Added 1 day ago</p>	 <p>Islamic State: "Storming Brigade 26 Headquarters of the Safavid Army –" Added 1 day ago</p>
 <p>Islamic State: "Charge of the Monotheists Upon the Dens of the Safavids" Added 1 day ago</p>	 <p>Islamic State: "Raid of Liberating al-Yamuk Refugee Camp – Wilayat" Added 1 day ago</p>	 <p>Islamic State: "A Declaration of Innocence and Cutting of Family" Added 1 day ago</p>	 <p>Islamic State: "Yemeni Congratulations For the Bay'ah of Our Brothers in" Added 1 day ago</p>
 <p>Islamic State: "Liberation of Umm al-Tabbikh Checkpoint – Wilayat" Added 1 day ago</p>	 <p>Islamic State: "Binghazi: The Meaning of Stability – Wilayat al-Barqah" Added 1 day ago</p>	 <p>Islamic State: "Amputation of the Corruption With the" Added 1 day ago</p>	 <p>Islamic State: "Give Me a Piece of Iron #3 – Wilayat Baghdad" Added 1 day ago</p>
 <p>Islamic State: "Shar'ah Institute in al-Ba'ij District – Wilayat al-" Added 1 day ago</p>	 <p>Islamic State: "Victory From God and An Imminent Conquest –" Added 1 day ago</p>	 <p>Islamic State: "Piety in Times of Calamity in the City of al-Mawjil (Mosul)" Added 1 day ago</p>	 <p>Islamic State: "Charge of the Supporters #2 – Wilayat Sin' (Sinai)" Added 1 day ago</p>
 <p>New video message from The Islamic State: "Then They Are Your Brothers" Added 1 day ago</p>	 <p>Islamic State: "Shaykh Abu Umar al-Baghdadi Military Training Camp –" Added 1 day ago</p>	 <p>al-Furqan Media presents a new audio message from the Islamic State's" Added 1 day ago</p>	 <p>New video message from The Islamic State: "From Prisoner to Sacrifice –" Added 1 day ago</p>
 <p>New video message from The Islamic State: "Hawjah Sirr:" Added 1 day ago</p>	 <p>New video message from The Islamic State: "Lion of the Battlefield #3 –" Added 1 day ago</p>	 <p>New video message from The Islamic State: "The Raid of Zawba" – Wilayat" Added 1 day ago</p>	 <p>New video message from The Islamic State: "Killing a Spy of the" Added 1 day ago</p>
 <p>New video message from The Islamic State: "Mending Fences" Added 1 day ago</p>	 <p>Ajnad Foundation For Media Production presents a new release" Added 1 day ago</p>	 <p>New video message from The Islamic State: "Aspects of the Battle on" Added 1 day ago</p>	 <p>New video message from The Islamic State: "Military Camp of the" Added 1 day ago</p>
 <p>New audio message from Mujahidin of Tunisia of al-Qayrawan: "Bay'ah to" Added 1 day ago</p>	 <p>New video message from The Islamic State: "Bay'as of the Defiant" Added 1 day ago</p>	 <p>New video message from The Islamic State: "The Raid of Abu Turab al-" Added 1 day ago</p>	 <p>New video message from The Islamic State: "The Most Effective" Added 1 day ago</p>
 <p>New video message from The Islamic State: "Glad Tidings of the Supporters" Added 1 day ago</p>	 <p>New video message from The Islamic State: "First Graduation Class From" Added 1 day ago</p>	 <p>New video message from The Islamic State: "The Beginning and Ending of" Added 1 day ago</p>	 <p>New video message from The Islamic State: "Graduation Class From" Added 1 day ago</p>
 <p>New video message from The Islamic State: "Client of the Enemy – Wilayat" Added 1 day ago</p>	 <p>Islamic State: "Joy of the Monotheists With the Victories of Their" Added 1 day ago</p>	 <p>Islamic State: "Joy of the Muslims With the Victories of the" Added 2 days ago</p>	 <p>Islamic State: "Extend Your Hand To Pledge Allegiance" Added 2 days ago</p>
 <p>Islamic State: "Motivational Messages From Yemen of Faith and" Added 2 days ago</p>	 <p>Islamic State: "Water: The Source of Life – Wilayat al-Raqqa" Added 2 days ago</p>	 <p>Islamic State" Added 2 days ago</p>	 <p>Coalition terrorists attacking muslim childrens in Mosul" Added 2 days ago</p>



# ATTACHMENT B

## ATTACHMENT B

Original Date	Sender ID	Receiver ID	Message Text
Sun Apr 26 11:24:06 +0000 2015	Ferizi	Hamayun	selam alejkum
Sun Apr 26 11:24:27 +0000 2015	Ferizi	Hamayun	brother i have 4 million data of kuffar countrys which attacking islamic state
Sun Apr 26 11:24:34 +0000 2015	Ferizi	Hamayun	
Sun Apr 26 11:24:37 +0000 2015	Ferizi	Hamayun	
Sun Apr 26 11:24:40 +0000 2015	Ferizi	Hamayun	
Sun Apr 26 11:24:43 +0000 2015	Ferizi	Hamayun	
Sun Apr 26 11:24:46 +0000 2015	Ferizi	Hamayun	
Sun Apr 26 11:25:05 +0000 2015	Ferizi	Hamayun	
Sun Apr 26 11:25:20 +0000 2015	Ferizi	Hamayun	just first page and not all images coming saying big space
Sun Apr 26 11:27:41 +0000 2015	Ferizi	Hamayun	do you need them just dumped i havent sleep for 3 days
Sun Apr 26 22:01:57 +0000 2015	Hamayun	Ferizi	?
Sun Apr 26 22:02:22 +0000 2015	Hamayun	Ferizi	Ü" ØÜ,ÜŠÜÜ... ØSÜ,ØPÜ,ØSÜ...
Sun Apr 26 22:02:37 +0000 2015	Hamayun	Ferizi	Sorry brother I couldnt reply back earlier on
Sun Apr 26 22:03:20 +0000 2015	Hamayun	Ferizi	I just seen ur messages
Sun Apr 26 22:04:04 +0000 2015	Hamayun	Ferizi	ok brother
Sun Apr 26 22:04:27 +0000 2015	Hamayun	Ferizi	Pliz explain whats this info about
Sun Apr 26 22:04:38 +0000 2015	Hamayun	Ferizi	If possible come on [redacted] lets talk on there
Sun Apr 26 22:05:00 +0000 2015	Hamayun	Ferizi	[Redacted] this is my [redacted] account
Sun Apr 26 22:05:20 +0000 2015	Hamayun	Ferizi	Lol get ur sleep too
Sun Apr 26 22:05:39 +0000 2015	Hamayun	Ferizi	brother im speaking with britani :) abu britani :)
Sun Apr 26 22:13:55 +0000 2015	Hamayun	Ferizi	Yes brother
Sun Apr 26 22:14:14 +0000 2015	Hamayun	Ferizi	Im muslim al britani
Sun Apr 26 22:16:44 +0000 2015	Hamayun	Ferizi	MashAllah brother I checked some of this info its really good
Sun Apr 26 22:16:58 +0000 2015	Hamayun	Ferizi	Can do some damage inshallah
Sun Apr 26 22:17:21 +0000 2015	Hamayun	Ferizi	Who are brother?
Sun Apr 26 22:17:33 +0000 2015	Hamayun	Ferizi	U sound like a good person
Sun Apr 26 22:17:46 +0000 2015	Hamayun	Ferizi	May Allah SWT protect u
Sun Apr 26 22:33:31 +0000 2015	Hamayun	Ferizi	Now iv checked it . Wow u know I was a credit card scammer in the UK
Sun Apr 26 22:33:59 +0000 2015	Hamayun	Ferizi	How can I thank u
Sun Apr 26 22:34:20 +0000 2015	Ferizi	Hamayun	:) (Y)
Sun Apr 26 22:35:15 +0000 2015	Hamayun	Ferizi	abu Hussain albritani is my friend he told me a lot about u
Sun Apr 26 22:35:45 +0000 2015	Hamayun	Ferizi	Pliz brother come and join us in the Islamic state
Sun Apr 26 22:50:56 +0000 2015	Ferizi	Hamayun	inshAllah
Wed May 06 09:42:39 +0000 2015	Individual A	Ferizi	No one gets killed without reason eh? So what about jihadi Johns beheadings? What reason for that when they were trying to help Muslims ?
Wed May 06 09:43:17 +0000 2015	Individual A	Individual A	man ill tell u they never kill someone without reason believe me i gurante u\ndo you know
Wed May 06 11:01:18 +0000 2015	Individual A	Ferizi	A group, calling itself the aCcolislaic State Hacking Div,aC posted the names, home addresses and photos of 100 American service member families
Wed May 06 11:04:35 +0000 2015	Ferizi	Individual A	yes cos they was the peoples who killed peoples in Iraq and syria
Wed May 06 11:04:52 +0000 2015	Ferizi	Individual A	if someone kill ur family and run would u not find him and kill him ?
Wed May 06 21:41:52 +0000 2015	Individual B	Ferizi	I think they contacted your host though. I'm not certain
Wed May 06 21:42:08 +0000 2015	Ferizi	Individual B	yeah they have send me an email :3\for terrorism something
Wed May 06 21:42:15 +0000 2015	Ferizi	Individual B	your team
Wed May 06 21:42:49 +0000 2015	Individual B	Ferizi	Lol. Little do they know.
Wed May 06 21:42:51 +0000 2015	Ferizi	Individual B	It has come to my attention that the website <a href="http://t.co/CrT9xSi310">http://t.co/CrT9xSi310</a> is being used as a website by a terrorist organization for the promot
Wed May 06 21:43:01 +0000 2015	Ferizi	Individual B	of violence and criminal activity. One look at the website and you can see criminal activity all over it. The videos on your site are being
Wed May 06 21:43:03 +0000 2015	Ferizi	Individual B	used to promote violence and encourage it. Please act on this website.
Wed May 06 21:43:21 +0000 2015	Ferizi	Individual B	i saw it lately :/ :p
Wed May 06 21:43:39 +0000 2015	Individual B	Ferizi	Oh. So they did. Wow.
Wed May 06 21:44:08 +0000 2015	Ferizi	Individual B	yeah they send to the hosting administrator (which is me)

\* The social media account names have been anonymized or changed to reflect the true names of the account users. Victim information has been redacted or replaced.

# ATTACHMENT C



Author*	Recipient	Message Sent (UTC)	Message	Message Status
Ferizi	Hussain	06/13/2015 07:59:15 PM	when here write me <ss type="smile">:)</ss>	Sent
Hussain		06/13/2015 10:01:53 PM	im here	Read
Ferizi	Hussain	06/13/2015 10:21:15 PM	hows u bro <ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:21:21 PM	salam alejkum	Sent
Ferizi	Hussain	06/13/2015 10:21:23 PM	was praying	Sent
Ferizi	Hussain	06/13/2015 10:21:25 PM	just came	Sent
Hussain		06/13/2015 10:21:28 PM	walaykumsallam	Read
Hussain		06/13/2015 10:21:33 PM	im good allhamdulillah	Read
Hussain		06/13/2015 10:21:34 PM	ypu	Read
Hussain		06/13/2015 10:21:36 PM	you	Read
Ferizi	Hussain	06/13/2015 10:21:45 PM	elhamdulillah brother <ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:22:01 PM	wait i prepare some dumps i got ok	Sent
Hussain		06/13/2015 10:22:08 PM	ok inshAllah	Read
Ferizi	Hussain	06/13/2015 10:23:27 PM	gov dump..html	Sent
Ferizi	Hussain	06/13/2015 10:23:37 PM	military dump..html	Sent
Hussain	Ferizi	06/13/2015 10:23:40 PM	which website akhi	Read
Ferizi	Hussain	06/13/2015 10:24:15 PM	[Victim Company] <ss type="smile">:)</ss> plus i got	Sent
Ferizi	Hussain	06/13/2015 10:24:18 PM	the credit card	Sent
Ferizi	Hussain	06/13/2015 10:24:26 PM	of airforce	Sent
Ferizi	Hussain	06/13/2015 10:24:30 PM	department	Sent
Ferizi	Hussain	06/13/2015 10:24:32 PM	waiti show u	Sent
Ferizi	Hussain	06/13/2015 10:24:46 PM	[Victim Company] have around 190k users	Sent
Ferizi	Hussain	06/13/2015 10:24:47 PM	<ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:26:39 PM	orders..html	Sent
Hussain	Ferizi	06/13/2015 10:28:44 PM	where u get the mil/gov dumps?	Read
Ferizi	Hussain	06/13/2015 10:28:57 PM	in the website [Victim Company] already now im connected on it	Sent
Ferizi	Hussain	06/13/2015 10:29:02 PM	u wanna come via teamviewer <ss type="smile">:)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:29:08 PM	u have a shell?	Read
Hussain	Ferizi	06/13/2015 10:29:21 PM	<ss type="worry">:S</ss>	Read
Hussain		06/13/2015 10:29:22 PM	[Victim Company] has gov and mil logins?	Read
Ferizi	Hussain	06/13/2015 10:29:22 PM	have db access	Sent
Hussain		06/13/2015 10:29:26 PM	ah ok	Read
Ferizi	Hussain	06/13/2015 10:29:28 PM	yes bro <ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:29:31 PM	come see bro	Sent
Hussain		06/13/2015 10:29:41 PM	can i see in 30mins?	Read
Hussain	Ferizi	06/13/2015 10:29:48 PM	free magabytes in 30mins	Read
Hussain		06/13/2015 10:29:52 PM	i have limit	Read
Hussain		06/13/2015 10:29:57 PM	but at 2am in 30mins its free	Read
Ferizi	Hussain	06/13/2015 10:30:00 PM		Sent
Ferizi	Hussain	06/13/2015 10:30:11 PM	oh good bro <ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:30:40 PM	i have also another shop which have 878k clients and its military shop	Sent
Ferizi	Hussain	06/13/2015 10:30:43 PM	<ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:30:50 PM	there is huge db	Sent
Hussain	Ferizi	06/13/2015 10:30:53 PM	Allahu Akbar	Read
Hussain		06/13/2015 10:30:57 PM	we need to hit them hard	Read
Ferizi	Hussain	06/13/2015 10:31:04 PM	yes inshaAllah <ss type="smile">:)</ss>	Sent
Hussain		06/13/2015 10:31:12 PM	ok akhi we will release biidnillah	Read
Ferizi	Hussain	06/13/2015 10:31:14 PM	just when we hit hit them strong <ss type="smile">:)</ss>	Sent
Hussain		06/13/2015 10:31:17 PM	but tell me, no one else has this?	Read
Ferizi	Hussain	06/13/2015 10:31:20 PM	noone	Sent
Ferizi	Hussain	06/13/2015 10:31:25 PM	brother only me u and Allah knows	Sent
Hussain		06/13/2015 10:31:32 PM	Allhamdulillah	Read
Hussain	Ferizi	06/13/2015 10:31:37 PM	how did u get DB access?	Read



Ferizi	Hussain	06/13/2015 10:31:43 PM	easy penetration	Sent
Hussain		06/13/2015 10:31:50 PM	SQLi?	Read
Ferizi	Hussain	06/13/2015 10:31:58 PM	sqli the mobile app <ss type="tongueout">:P</ss>	Sent
Ferizi	Hussain	06/13/2015 10:32:12 PM	and got access all in <ss type="smile">:)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:32:19 PM	masha'Allah	Read
Hussain		06/13/2015 10:32:21 PM	nice	Read
Ferizi	Hussain	06/13/2015 10:32:32 PM	everyday 400/500 orders come in this website [Victim Company] <ss type="smile">:)</ss>	Sent
Hussain		06/13/2015 10:32:44 PM	but how u got DB login info?	Read
Ferizi	Hussain	06/13/2015 10:33:34 PM		Sent
Ferizi	Hussain	06/13/2015 10:34:16 PM	penetration after penetration	Sent
Ferizi	Hussain	06/13/2015 10:34:20 PM	injection after injection <ss type="cat">:3</ss>	Sent
Hussain	Ferizi	06/13/2015 10:35:23 PM	Allahu Akbar	Read
Hussain	Ferizi	06/13/2015 10:35:32 PM	akhi maybe some of these military emails	Read
Hussain	Ferizi	06/13/2015 10:35:37 PM	the passwords work for their emails	Read
Hussain		06/13/2015 10:35:40 PM	u tried?	Read
Ferizi	Hussain	06/13/2015 10:35:51 PM	didnt tried yet bro	Sent
Ferizi	Hussain	06/13/2015 10:35:56 PM	got now	Sent
Ferizi	Hussain	06/13/2015 10:36:02 PM	the other db i have 900k	Sent
Ferizi	Hussain	06/13/2015 10:36:06 PM	bro all Military	Sent
Ferizi	Hussain	06/13/2015 10:36:13 PM	i putted in sql map	Sent
Ferizi	Hussain	06/13/2015 10:36:16 PM	for getting	Sent
Ferizi	Hussain	06/13/2015 10:36:22 PM	it have so syntax errors but works	Sent
Ferizi	Hussain	06/13/2015 10:36:24 PM	but slowly	Sent
Ferizi	Hussain	06/13/2015 10:36:30 PM	gonna get a big servers	Sent
Ferizi	Hussain	06/13/2015 10:36:41 PM	to dump it fast	Sent
Hussain	Ferizi	06/13/2015 10:36:49 PM	this one u gave me is all .mil ?	Read
Ferizi	Hussain	06/13/2015 10:37:02 PM	no this one have 900 email .mil	Sent
Ferizi	Hussain	06/13/2015 10:37:06 PM	and 500 .gov	Sent
Ferizi	Hussain	06/13/2015 10:37:09 PM	with passwords	Sent
Hussain	Ferizi	06/13/2015 10:37:13 PM	but there is more in server?	Read
Ferizi	Hussain	06/13/2015 10:37:14 PM	the other one is military site	Sent
Ferizi	Hussain	06/13/2015 10:37:24 PM	brother its another server	Sent
Ferizi	Hussain	06/13/2015 10:37:25 PM		Sent
Hussain	Ferizi	06/13/2015 10:37:32 PM	ok so in [Victim Company] we have 900 .mil and 500 .gov	Read
Ferizi	Hussain	06/13/2015 10:37:37 PM	<ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:37:37 PM	yes	Sent
Hussain	Ferizi	06/13/2015 10:37:42 PM	ok perfect	Read
Ferizi	Hussain	06/13/2015 10:37:50 PM		Sent
Hussain	Ferizi	06/13/2015 10:37:54 PM	all mil?	Read
Ferizi	Hussain	06/13/2015 10:37:57 PM	so gonna see	Sent
Ferizi	Hussain	06/13/2015 10:38:07 PM	not all mil but 70% maybe <ss type="smile">:)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:38:10 PM	yes maybe	Read
Ferizi	Hussain	06/13/2015 10:38:11 PM	lets see lets see db is big	Sent
Ferizi	Hussain	06/13/2015 10:38:18 PM	after all dump	Sent
Hussain	Ferizi	06/13/2015 10:38:20 PM	ok perfect inshAllah	Read
Ferizi	Hussain	06/13/2015 10:38:21 PM	gonna see slowly	Sent
Ferizi	Hussain	06/13/2015 10:38:23 PM	inshaAllah	Sent
Hussain	Ferizi	06/13/2015 10:38:31 PM	we will only release mil and gov	Read
Hussain	Ferizi	06/13/2015 10:38:38 PM	and the others we release later	Read
Ferizi	Hussain	06/13/2015 10:38:45 PM	USAF	Sent
Ferizi	Hussain	06/13/2015 10:38:48 PM	united state air force	Sent
Hussain	Ferizi	06/13/2015 10:38:52 PM	we will make like a message inshAllah	Read
Ferizi	Hussain	06/13/2015 10:38:53 PM	i have the credit card payment they make online <ss type="smile">:)</ss>	Sent



Hussain	Ferizi	06/13/2015 10:39:02 PM	like u know the hitlist I made	Read
Hussain	Ferizi	06/13/2015 10:39:06 PM	with addresses	Read
Hussain	Ferizi	06/13/2015 10:39:14 PM	we will make message to kuffar and release the .mil and.gov	Read
Hussain		06/13/2015 10:39:24 PM	akhi u work on the mil shop	Read
Hussain	Ferizi	06/13/2015 10:39:31 PM	I will check if emails match with passwords	Read
Hussain		06/13/2015 10:39:39 PM	maybe we find some good information	Read
Ferizi	Hussain	06/13/2015 10:41:14 PM	keke..html	Sent
Ferizi	Hussain	06/13/2015 10:41:22 PM	ok brother <ss type="smile">:)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:41:51 PM	Allahu Akbar	Read
Hussain	Ferizi	06/13/2015 10:42:10 PM	Akhi this will hit them hard	Read
Ferizi	Hussain	06/13/2015 10:42:19 PM	yes brother inshaAllah <ss type="smile">:)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:42:24 PM	we will make a good message to the kuffar	Read
Ferizi	Hussain	06/13/2015 10:42:30 PM	yes bro <ss type="smile">:)</ss> <ss type="yes">(Y)</ss> <ss type="smile">:)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:42:36 PM	I will write it later	Read
Hussain	Ferizi	06/13/2015 10:42:39 PM	and u check it inshAllah	Read
Ferizi	Hussain	06/13/2015 10:42:41 PM	good <ss type="smile">:)</ss> <ss type="yes">(Y)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:42:43 PM	and we release	Read
Ferizi	Hussain	06/13/2015 10:42:45 PM	inshaAllah <ss type="smile">:)</ss>	Sent
Hussain	Ferizi	06/13/2015 10:42:49 PM	but no names we don't release our names	Read
Ferizi	Hussain	06/13/2015 10:42:55 PM	no names	Sent
Ferizi	Hussain	06/13/2015 10:42:56 PM	of course	Sent
Hussain	Ferizi	06/13/2015 10:43:02 PM	just Islamic State Hacking Division	Read
Hussain	Ferizi	06/13/2015 10:43:05 PM	its official name	Read
Ferizi	Hussain	06/13/2015 10:43:05 PM	good <ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:43:08 PM	yes yes thats good <ss type="smile">:)</ss>	Sent
Ferizi	Hussain	06/13/2015 10:43:11 PM	no need names	Sent
Hussain	Ferizi	06/13/2015 10:43:18 PM	akhi u need to make hijrah	Read
Hussain	Ferizi	06/13/2015 10:43:22 PM	we can work together here	Read
Hussain	Ferizi	06/13/2015 10:43:24 PM	full time	Read
Ferizi	Hussain	06/13/2015 10:43:33 PM	yes bro :/	Sent
Ferizi	Hussain	06/13/2015 10:43:37 PM	i should :/	Sent
Hussain	Ferizi	06/13/2015 10:43:41 PM	i can help u inshAllah	Read
Hussain	Ferizi	06/13/2015 10:43:56 PM	i will give u tazkiyah and when u come i will get a special letter for u	Read
Hussain	Ferizi	06/13/2015 10:44:06 PM	to skip everything and come straight to this work	Read
Ferizi	Hussain	06/13/2015 10:44:12 PM	wallah <ss type="surprised">:O</ss> ?	Sent
Hussain	Ferizi	06/13/2015 10:44:17 PM	wallahi akhi	Read
Hussain	Ferizi	06/13/2015 10:44:19 PM	easy	Read
Ferizi	Hussain	06/13/2015 10:44:27 PM	cos brother u know wallahi i started around 2 months to pray bro :/	Sent
Hussain	Ferizi	06/13/2015 10:44:34 PM	no problem akhi	Read
Ferizi	Hussain	06/13/2015 10:44:35 PM	<ss type="sad">:</ss>	Sent
Hussain	Ferizi	06/13/2015 10:44:50 PM	u will just do 30day sharia training course	Read
Hussain	Ferizi	06/13/2015 10:44:53 PM	they teach u everything	Read
Hussain	Ferizi	06/13/2015 10:44:56 PM	in english	Read
Ferizi	Hussain	06/13/2015 10:44:57 PM	thats good	Sent
Ferizi	Hussain	06/13/2015 10:44:59 PM	brother	Sent
Hussain	Ferizi	06/13/2015 10:45:00 PM	after that u show them the letter	Read
Hussain	Ferizi	06/13/2015 10:45:07 PM	u get fast tracked to my division	Read
Ferizi	Hussain	06/13/2015 10:45:11 PM	how much need have bro every month money there?	Sent
Hussain	Ferizi	06/13/2015 10:45:27 PM	dowla pays	Read
Hussain	Ferizi	06/13/2015 10:45:29 PM	minha	Read
Hussain	Ferizi	06/13/2015 10:45:31 PM	and fai	Read
Ferizi	Hussain	06/13/2015 10:45:41 PM	i mean to survive there how much i need to have	Sent
Ferizi	Hussain	06/13/2015 10:45:42 PM	every month	Sent
Hussain	Ferizi	06/13/2015 10:45:46 PM	50 dollars per adult dowla give	Read
Hussain	Ferizi	06/13/2015 10:45:51 PM	and 100 dollars fai	Read
Hussain	Ferizi	06/13/2015 10:45:54 PM	they give 150 dollars	Read
Hussain	Ferizi	06/13/2015 10:45:59 PM	but if u are not married	Read
Hussain	Ferizi	06/13/2015 10:46:10 PM	free house	Read
Hussain	Ferizi	06/13/2015 10:46:10 PM	u will stay in the base	Read
Hussain	Ferizi	06/13/2015 10:46:13 PM	free food	Read
Hussain	Ferizi	06/13/2015 10:46:15 PM	free electric	Read
Hussain	Ferizi	06/13/2015 10:46:17 PM	free gas	Read

# ATTACHMENT D

## ATTACHMENT D

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"text" : "i work with that brother akhi",  
"sender\_id" : Hussain  
"recipient\_id" : Individual C  
"created\_at" : "Tue Aug 11 19:37:21 +0000 2015"

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"text" : "hes in our team",  
"sender\_id" : Hussain  
"recipient\_id" : Individual C  
"created\_at" : "Tue Aug 11 19:37:37 +0000 2015"

\*\*\*\*\*

"text" : "Elhamdulilah because i feared for him though kuffar maybe arrested him or anything",  
"sender\_id" : Individual C  
"recipient\_id" : Hussain  
"created\_at" : "Tue Aug 11 19:38:15 +0000 2015"

\*\*\*\*\*

"text" : "his fb was deleted and he didnt respond on [redacted] also his twitter acc was dead",  
"sender\_id" : Individual C  
"recipient\_id" : Hussain  
"created\_at" : "Tue Aug 11 19:38:42 +0000 2015"

\*\*\*\*\*

"text" : "no akhi hes just busy lately",  
"sender\_id" : Hussain  
"recipient\_id" : Individual C  
"created\_at" : "Tue Aug 11 19:38:51 +0000 2015"

\* The social media account names have been anonymized or changed to reflect the true names of the account users. Victim information and sensitive information has been redacted.