

UNITED STATES DISTRICT COURT

for the

District of Colorado

FILED

UNITED STATES DISTRICT COURT

DENVER, COLORADO

12/18/2023

JEFFREY P. COLWELL, CLERK

United States of America )

v. )

HUMZAH MASHKOOR )

Case No. 1:23-mj-00214-NRN

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

Between on or about September 1, 2022 and December 18, 2023 in the counties of Adams and Denver in the State and District of Colorado, the defendant violated:

Code Section

Offense Description

18 U.S.C. § 2339B

Attempting to provide material support or resources to designated foreign terrorist organizations

This criminal complaint is based on these facts:

See Affidavit attached hereto and herein incorporated by reference.

X Continued on attached sheet.

s/ SA Kathryn Kempema

Complainant's signature

FBI SA Kathryn Kempema

Printed name and title

Sworn to before me and: [ ] signed in my presence.

[X] submitted, attested to, and acknowledged by reliable electronic means.

Date: 12/18/2023

[Handwritten signature of N. Reid Neureiter]

Judge's signature

City and state: Denver, Colorado

Magistrate Judge N. Reid Neureiter

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Kathryn Kempema, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I seek a criminal complaint charging Humzah Mashkooor with one count of attempting to provide material support or resources (that is, services; personnel, including himself; and money) to a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since December 2022. I have 12 months of Federal Law Enforcement experience and have received training at the FBI Academy in Quantico, Virginia. As part of my duties, I investigate criminal violations, including but not limited to various international terrorism investigations. I have received training and instruction in this field and have been involved in several investigations relating to violations of 18 U.S.C. § 2339B (providing, attempting to provide, and conspiring to provide material support or resources to designated foreign terrorist organizations). As an agent with the FBI, I am authorized to investigate violations of the laws of the United States.

3. The facts in this affidavit are based on my personal observations, my training and experience, and information obtained from other agents and law enforcement officers, U.S. Government personnel, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter. Where I have reported statements made by others or from documents that I have reviewed, those statements are either summarized or noted with quotations, in which case any grammar or spelling mistakes are accurate to the original communication.

4. Based on my training and experience, and the facts set forth in this affidavit, there is probable cause to believe that a violation of Title 18, United States Code, Section 2339B, has been committed by Mashkooor.

#### **JURISDICTION AND VENUE**

5. As discussed more fully below, acts or omissions in furtherance of the offenses under investigation occurred within the District of Colorado.

#### **STATUTORY AUTHORITY AND DEFINITIONS**

6. This investigation concerns a violation of 18 U.S.C. § 2339B, which prohibits a person from knowingly providing material support or resources to a foreign terrorist organization, or attempting or conspiring to do the same. “Material support or resources” means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (one or more individuals who may be or include oneself), and transportation, except medicine or religious materials. *See* 18 U.S.C. § 2339A(b)(1). “Terrorist organization” means an organization designated as a terrorist organization under section 219 of the Immigration and Nationality Act (“INA”). *See* 18 U.S.C. § 2339B(g)(6).

#### **THE ISLAMIC STATE OF IRAQ AND AL-SHAM (“ISIS”)**

7. On or about October 15, 2004, the U.S. Secretary of State designated Al-Qaida in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the INA and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated

Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (*i.e.*, “ISIS” – which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 15, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

8. On July 4, 2014, at a mosque in Mosul, Iraq, Abu Bakr al-Baghdadi declared himself the Caliph of the Islamic State, which was also known as the Caliphate. Al-Baghdadi also called on Muslims around the world to make “hijrah,”<sup>1</sup> a term that means to emigrate to ISIS territory and join the Islamic State. According to a report published by the United States House of Representatives in 2015, more than 25,000 foreigners traveled to Iraq and Syria and joined ISIS as fighters. This included 4,500 people from Western countries and more than 250 Americans. These foreign fighters were deployed as part of ISIS’s attempt to take over and hold large parts of Syria and Iraq, which was a vital objective of the Caliphate. At its peak, ISIS ruled over parts of Syria and Iraq equivalent to the size of the United Kingdom. However, over the ensuing years, the United States and coalition forces defeated ISIS in several battles and ultimately expelled ISIS from the territory it had conquered, resulting in the defeat and collapse of the Caliphate in 2019. Although ISIS lost the physical territory it had conquered, the group continues to conduct terrorist attacks and other operations in Syria, Iraq, and elsewhere around the world. ISIS also continues to pursue the goal of one day re-establishing the Caliphate.

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<sup>1</sup> The word, “hijrah” is the Arabic word for “migration” or “emigration.” When used by ISIS supporters, “hijrah” means traveling to join ISIS.

9. ISIS-Khorasan (ISIS-K) is the ISIS contingent in the Khorasan region. ISIS announced its expansion to the region in 2015. The Khorasan region includes parts of Iran, Central Asia, Afghanistan, and Pakistan. ISIS-K operates primarily in Afghanistan and Pakistan. It is one of ISIS's most lethal branches and has killed or injured thousands. Among other things, ISIS-K conducts attacks on Taliban personnel. On January 14, 2016, the Secretary of State designated ISIS-K as an FTO.

### **PROBABLE CAUSE**

#### *Overview*

10. Humzah Mashkooor, whose date of birth is in November 2005, first came to the attention of law enforcement in approximately November 2021 based on his use of social media to express his support for ISIS and communicate with other ISIS supporters. Then, in approximately September 2022, Mashkooor began communicating with an FBI employee acting in a covert capacity online (an "online covert employee" or "OCE"), who posed as a fellow ISIS supporter. Over the course of the investigation, Mashkooor spoke with four different OCEs who posed as fellow ISIS supporters.

11. Throughout his conversations with the OCEs, Mashkooor frequently took operational security measures to avoid account bans and evade law enforcement detection. Those measures included, among other things, using coded phrases, creating multiple accounts on social media or communications platforms, continuously changing his usernames on social media or communications platforms, and separating communication between different platforms. In my training and experience, it is not uncommon for ISIS supporters to take such measures when communicating online. For example, ISIS supporters frequently use terms like "H" and "vacation" to refer to hijrah, *i.e.*, travel for the purpose of joining ISIS; refer to ISIS by using code words like

“D” for the dawlah<sup>2</sup>; and refer to fellow ISIS supporters as “brothers.” Sophisticated users also commonly use characters to replace letters—for example, “!\$!” instead of “ISIS”—in an attempt to avoid potential algorithms used by social media companies to flag certain words or content that may violate their terms of use.

12. Despite his attempts to obfuscate his communications, however, in my training and experience the full context of Mashkooor’s communications with the OCEs between September 2022 and December 2023 demonstrated that Mashkooor repeatedly expressed his intent to travel in order to join ISIS as a fighter, to provide money to ISIS to support their efforts, and to recruit others to also support ISIS through travel and/or financial contributions. At various times during those conversations, Mashkooor expressed frustration that he was unable to travel to join ISIS or provide money to ISIS to support their efforts because he was not yet eighteen. Mashkooor also indicated, using coded language, that an ISIS contact suggested to Mashkooor that he (Mashkooor) conduct an attack in the United States. Mashkooor, however, decided that making hijrah was his primary goal.

13. As Mashkooor’s eighteenth birthday approached in November 2023, he began making more concrete plans to travel abroad to join ISIS. Around that time, he also disclosed a desire to get married either in the United States or abroad. Ultimately, however, he told multiple OCEs that he was planning to “make H” (meaning hijrah) by going through Dubai, where he would remain for a period of time based on information he received from a recruiter affiliated with an ISIS media organization (“Individual 1”).

14. On or about November 25, 2023, Mashkooor purchased a flight, scheduled for December 11, 2023, from Denver, Colorado with the ultimate destination of Dubai, United Arab

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<sup>2</sup> “Dawlah” is an Arabic word meaning “state,” and is often used by ISIS supporters as a shorthand reference to the Islamic State or ISIS.

Emirates and connections through New York, New York (JFK) and Kuwait. Mashkoor told one of the OCEs that from Dubai he planned to eventually travel on to Afghanistan, but that Individual 1 had told Mashkoor “to wait” to book the onward travel to Afghanistan to make sure “everything goes okay” given the situation in Kabul.

15. However, on December 10, 2023, Mashkoor delayed his travel because he was sick with COVID. His travel was subsequently rescheduled for December 18, 2023, at which time he is scheduled to travel from Denver, Colorado to New York, New York (LGA). Mashkoor is scheduled on the morning of December 19, 2023, to then travel from New York, New York (JFK) to Doha, Qatar, with a final destination of Sharjah, United Arab Emirates (“UAE”). One of Mashkoor’s adult relatives (“Relative 1”) is scheduled to travel with Mashkoor and then return to Denver, Colorado from Dubai, UAE on December 30, 2023. Mashkoor does not have a return trip booked. Based on Mashkoor’s statements to various OCEs, Mashkoor is going to the UAE in order to either continue on to Afghanistan to join ISIS-K or to Syria to join ISIS.<sup>3</sup>

***Mashkoor’s initial identification and background***

16. In approximately 2021, Social Media Company 1 sent a suspicious activity referral to the FBI for a particular account (“Social Media Account 1”). Among other things, the referral contained posts from the account, which included screenshots taken from a Vice News report depicting a male in a headdress, covering his face while holding an AK-style machine gun. Above the image of the man is a banner with Arabic calligraphy and a hand with only the index finger raised.<sup>4</sup> Subsequent images included subtitles which read “if we freed this area and Kunduz City

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<sup>3</sup> Although the context of Mashkoor’s communications demonstrates that he supports both ISIS and ISIS-K, in his communications Mashkoor frequently refers generally to ISIS whether explicitly or implicitly. Accordingly, this affidavit often refers generally to ISIS to encompass both FTOs.

<sup>4</sup> I am aware that a hand with only the index finger raised is a visual symbol for Tawhid. “Tawhid” is an Arabic word meaning “the oneness of God.” This gesture is commonly used by ISIS supporters.

from the infidels, we can move on to Kabul and the rest of Afghanistan.” Additional images included a man standing next to the flag of ISIS.

17. The display name for Social Media Account 1 was “Humzah Afghan.” Law enforcement agents subsequently determined that Mashkooor was the user of that account. In particular, the email associated with the account was humzah.mashkooor@\*\*\*\*\*.com; the phone number associated with the account was the number used by Relative 1; and the IP address associated with the account had a service address of a certain residential address in Thornton, Colorado (the “Thornton residence”), where Mashkooor lived at the time.

18. In approximately July 2022, the Thornton Police Department (“TPD”) responded to the Thornton residence regarding an alleged physical assault. H.G., an adult male who is related to Mashkooor, reported that Mashkooor hit H.G. after they got into an argument. H.G. further reported that Mashkooor said he (Mashkooor) wanted to kill people and cut their heads off.<sup>5</sup> Mashkooor was also interviewed by TPD officers and denied making any such statement or assaulting H.G. Mashkooor provided telephone number 720-331-\*\*\*\* as his phone number. Relative 1 was also present and told TPD officers that Mashkooor struggled from mental illness and had high-functioning autism.

19. Mashkooor’s parents are divorced, and, for a period of time until 2023, Relative 1 resided in Texas (the “Texas residence”). Relative 1 began living in Westminster, Colorado, in approximately May or June 2023 (the “Westminster residence”). Based on surveillance and other information gathered in the course of this investigation, I know that, between June 2022 and

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<sup>5</sup> Although H.G. initially reported to TPD that Mashkooor was dangerous, he subsequently told investigators that he generally thought Mashkooor was a “good, harmless kid.” H.G. further volunteered that Mashkooor “hates extremist groups like the Taliban and ISIS.” He explained that, on the night TPD responded in July 2022, Mashkooor referred to H.G. as “an infidel.”



December 2023, Mashkooor has lived at the Thornton residence, the Texas residence, and the Westminster residence for varying periods of time.

***In Fall 2022, Mashkooor discussed his support of ISIS and intent to travel to Afghanistan to join ISIS***

20. In the fall of 2022, Mashkooor began communicating with an FBI employee acting in a covert capacity online (“OCE-1”) using a particular social media account (“Social Media Account 2”). OCE-1 posed online as an ISIS supporter. OCE-1 and Mashkooor then began communicating on an encrypted mobile messaging application (“MMA 1”), where Mashkooor was then using MMA Account 1.<sup>6</sup> Over time, Mashkooor frequently changed the username associated with MMA Account 1, but the user ID associated with that account remained consistent.

21. Although he referred to himself as “Abu Yassin” on MMA 1, I believe that Mashkooor is the user of both Social Media Account 2 and MMA Account 1 because (1) both accounts were then associated with Mashkooor’s phone number, 720-331-\*\*\*\*; and (2) Mashkooor provided personal details to OCE-1 using MMA Account 1 that were corroborated throughout the investigation, including that his relative reported him to the police after they got into an argument about Shias.

22. Moreover, records obtained for Social Media Account 2 include pictures that I have concluded depict Mashkooor based on Mashkooor’s identification documents. Using Social Media Account 2, in 2022, Mashkooor frequently expressed support for ISIS. For example, between April

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<sup>6</sup> In my training and experience, fellow ISIS supporters often talk more openly on encrypted messaging applications, as opposed to other social media platforms, because encrypted applications are perceived to be more secure. Indeed, using Social Media Account 2, Mashkooor at times told others, “There’s much more I want to say but I cannot [Social Media Company 2] works with the feds.” At times, Mashkooor also disclaimed support of ISIS on Social Media Account 2—stating, “I am against terrorism and extremism”—while at the same time discussing plans to join ISIS on MMA 1. As discussed above, based on my training and experience, this is indicative of operational security measures taken by Mashkooor to evade law enforcement detection.

and May 2022, Mashkooor used Social Media Account 2 to send a video of people being executed to several different users. He variously commented, “This is what we do to Shias you filthy Rafidhi kalb [laughing emoji, laughing emoji, one finger emoji, black flag emoji];” and “i love !\$\$ they kill your filth.”

23. In the fall of 2022, Mashkooor eventually disclosed to OCE-1 his background and how he came to support ISIS. Mashkooor told OCE-1 that he was born in the U.S. and then returned to Afghanistan for a few years before his family was forced to leave Afghanistan.<sup>7</sup> Mashkooor said that, since then, he had been living “in this disgusting kufr land.”<sup>8</sup> He indicated a desire to return to Afghanistan, where he has family in Nangarhar and other areas under Taliban control. Mashkooor stated that he previously supported the Taliban but started “looking more into” “the dawlah” after they “b0mbed the airport and took those Taliban and us soldiers and sent them to jahanam.”<sup>9</sup> I understand Mashkooor’s statement as a reference to ISIS-K’s claim that they were responsible for the bombing at the Kabul airport in August 2021 that killed both Taliban and U.S. soldiers. Mashkooor told OCE-1 that he had been “a supporter for almost a year now, and had learned the manhaj as well.”<sup>10</sup>

24. In that same chat, Mashkooor told OCE-1 that Mashkooor had a lot of mujahideen contacts in Afghanistan but lost them several months ago. Based on my training and experience, the term “mujahideen” in this context refers to ISIS fighters. I understand this to signify that Mashkooor had previously made attempts to contact individuals who could help facilitate his travel

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<sup>7</sup> Mashkooor’s U.S. passport confirms that he was born in the United States. The government, however, does not have a record of Mashkooor traveling to Afghanistan in the early years of his life.

<sup>8</sup> The term “kufr” means disbelief in God, His Prophets and His religion, and, in this context, refers to non-Muslims.

<sup>9</sup> “Jahanam” is the Arabic word for the concept of hell in Islam.

<sup>10</sup> The term “manhaj” refers to the methodology by which truth is reached, and is frequently used by ISIS supporters to reference their religious ideology.

into Afghanistan to join ISIS. Mashkooor stated that he and “the brothers” planned “to go to Afghanistan for hijra soon,” but expressed the need for a contact to meet them in Kabul. During these conversations, Mashkooor suggested, in coded language, that OCE-1 join them.

25. Mashkooor also told OCE-1 in that chat that he was trying to get a visa to enter Afghanistan, but it was harder for him because his “murtad” relative reported Mashkooor to the police after Mashkooor and his relative got into an argument about Shias.<sup>11</sup> This is likely a reference to the July 2022 incident previously noted in paragraph 18 where H.G. reported Mashkooor to TPD.

26. In the course of that conversation, Mashkooor also lamented that “they” are “trying to stop Muslims from making the hijrah.” OCE-1 responded that for now OCE-1 would continue to prepare, and Mashkooor responded “Are you ready though akhi? Once we go there’s no turning back... We leave behind everything... Our family’s... Our homes... Our friends... For the sake of Allah swt... And pleasing him... Life won’t be easy, we will be strangers moving from place to place... Hated by the whole worlds.”

***Between October and December 2022, Mashkooor continued to discuss travel to join ISIS***

27. In September 2022, after Mashkooor asked OCE-1 if OCE-1 had any contacts in Khorasan, OCE-1 provided Mashkooor with an account on MMA 1 for an individual who Mashkooor believed was able to facilitate his travel but was in fact an FBI employee acting in a covert capacity online (“OCE-2”). Mashkooor asked OCE-2 if OCE-2 was in Khorasan, and told OCE-2 “[god willing] me and the brothers are coming” in “4 months or so.” He described the “brothers” as “UK brothers” who he planned to meet at the Kabul airport. Mashkooor, however, indicated that they would “need someone to take [them] in sha Allah.”<sup>12</sup> When OCE-2 asked if Mashkooor had any

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<sup>11</sup> The term “murtad” is an Arabic word meaning “apostate from Islam.”

<sup>12</sup> “In sha Allah,” means “If God wills.” It is said before or after something one would like to happen.

prior or existing contacts with “mujahideen” in Afghanistan, Mashkooor responded that a friend had given him the contact of a “mujahid in kunar province” whom he had spoken with a bit. Mashkooor, however, lost that connection, commenting that his contact “possibly was martyred,” and said he had “no other connection.” He said he also “had another brother from turkey who went to kunduz province” but he indicated that “he is now martyred” as well. I understand that martyred in this context means fighting for ISIS.

28. When discussing his travel plans with OCE-2 in September 2022, Mashkooor stated, “My family here thinks I am going just to visit my family,” “[s]o they are supporting me up until I fly.” When speaking to OCE-2 in mid-October 2022, however, Mashkooor explained that while he “wish[ed] to come as soon as possible,” he may have to wait until he turned eighteen to travel because he did not have his parents’ permission. At that time, Mashkooor was sixteen years old.

29. Despite Mashkooor’s difficulties in scheduling his travel, he continued to discuss his plans to support ISIS. When asked what training or experience he had, Mashkooor told OCE-2, “I am prepared to do anything which they require me to do . . . I just want to be used as soon as possible, gun attcks, !st!sh@ @d!<sup>13</sup> . . . I have no training, I used to have some practice with guns with I was younger. But that is it.”

30. In approximately mid-October 2022, Mashkooor told both OCE-1 and OCE-2 to contact him on a different MMA 1 account (“MMA Account 2”), which he was switching to in order to be “safer.”<sup>14</sup> Using that account, Mashkooor told OCE-1 that he continued to have trouble

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<sup>13</sup> Based on my training, experience, and conversations with other investigators, I believe Mashkooor’s use of various characters, in this context, is a reference to “istishaad,” an Arabic term used by ISIS supporters for a martyrdom operation in which the attacker is killed.

<sup>14</sup> After October 2022, Mashkooor used both MMA Account 1 and MMA Account 2 to speak with the OCEs and frequently switched between the accounts, likely in an effort to obfuscate his online activity. The content of those communications between October 2022 and December 2023 supports the conclusion that Mashkooor was the sole user of MMA Account 1 and MMA Account 2 during that time period. Accordingly, this affidavit does not note every instance in which Mashkooor switched between accounts.

with his “hijrah situation” because Relative 1 and his father would not agree to him going away “even for ‘vacation.’” He explained that Relative 1 would not let him “apply for visa or give [him his] passport.”

31. Also in mid-October 2022, OCE-2 asked Mashkooor whether he had done a “bayat,” or pledge of allegiance. Mashkooor confirmed that he had, and then messaged OCE-2 his bayat to ISIS leader Abu al-Hasan al-Hashimi al-Qurashi, the text of which was as follows:

I pledge bayah, my allegiance to Amir ul muhmineen, the khalifah of the Muslims, the mujahid shaykh Abul Hasan Al hashimi Al qurayshi hafidhullah ta ala, to listen and obey, in good times and bad times, and in times of hardship and ease, and to do so selflessly, and not to dispute the command of those in authority unless I see blatant kufr, concerning which we have proof from Allah swt, and Allah swt bears witness to what I say.

32. Based on information received from Electronic Communications Service Provider 1 pursuant to legal process, on or about December 24, 2022, Mashkooor conducted a search and subsequently visited a website that provided religious guidance on the ability to take back an oath or vow.

33. Mashkooor continued to speak with OCE-2 in late December 2022, and told OCE-2 that he “ha[d] the money ready” but needed to see if he could “get visa before 18 or not.” When asked if he had guns to shoot, Mashkooor told OCE-2, “I am still too young to purchase a lot of guns too, not being 18 is only thing holding me back from coming right now.”

34. Then, in late December 2022, Mashkooor told OCE-1 on MMA 1 that several people he spoke with online “got sacked and are facing extremely high charges.” As a result, Mashkooor indicated that he was “in edge” even though he used “different emails and vpns for everything,” and was going to take operational security measures such as deactivating certain accounts. Mashkooor started using a new phone number, 303-949-\*\*\*\*, on December 5, 2022, and had deactivated Social Media Account 2 by late January 2023.

35. I am aware that an individual Mashkooor was in contact with on Social Media Account 2 was arrested in a foreign country in November 2022 and charged with terrorism offenses.

36. Mashkooor had also previously used Social Media Account 2 in approximately September 2022 to communicate with another individual who was arrested and ultimately pled guilty in another country to collecting and disseminating terrorist material. In the course of those September 2022 conversations, Mashkooor told that overseas individual that Mashkooor had a contact who might be able to assist with their travel—likely referring to OCE-2, although Mashkooor did not refer to OCE-2 by name. In response, that overseas individual told Mashkooor that he could not apply for a passport right now because he was “on bail” in connection with a counterterrorism investigation.

37. Ultimately, Mashkooor did not follow through with his stated plans to travel to Afghanistan in early 2023.

***Between January 2023 and March 2023, Mashkooor discussed traveling to join ISIS during Ramadan by traveling through Dubai, Qatar, or Pakistan***

38. In January 2023, Mashkooor told OCE-1, “I’ve been reflecting on my life and my past, getting ready to part from my loved ones and my childhood memories, contemplating death and shahada,<sup>15</sup> most of all I made dua that Allah swt keeps me firm on this path.”<sup>16</sup> Mashkooor explained that he “may be able to go” before he turned eighteen, and, if so, he wanted to go during Ramadan. In 2023, Ramadan began on March 22, 2023, and lasted for thirty days. Mashkooor said that he had “a plan” that included “tricking [his] other parent” by telling them “it’s small vacation

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<sup>15</sup> Based on the context of this comment, I understand “shahada” to mean “martyrdom” when used by Mashkooor here.

<sup>16</sup> “SWT” is shorthand for “Subhanahu wa ta’ala” which translates to “Glory to him, the exalted” indicating reverence and devotion to God.

to Dubai or Qatar or Pakistan wherever we go.” During that conversation, Mashkooor continued to indicate that he wanted to coordinate his travel with OCE-1.

39. Based on my training and experience, it is likely that Mashkooor referenced traveling through Dubai, Qatar, and Pakistan because those are three viable locations where he could obtain a visa for Afghanistan.

40. Between January and February 2023, Mashkooor also told OCE-2 that he wanted to travel between “march 20-30” and asked OCE-2 whether he (Mashkooor) needed permission from one or both of his parents. Mashkooor explained that his “situation is a little complicated” because his “parents have separated.” OCE-2 responded that other brothers have traveled after they turned eighteen, to which Mashkooor responded, “Yeah I was thinking that.” Mashkooor indicated, however, that he still hoped to travel before then. Mashkooor also told OCE-2 that he had come into contact “with official recruiter” from a known ISIS media organization, and provided OCE-2 with the MMA 1 handle for that individual (“Individual 1”).

41. Mashkooor continued to discuss travel plans in February 2023 with OCE-1 using coded language. In particular, Mashkooor stated, “I came into contact with people in charge of recruitment for the video game land to help us squad up . . . So that we can successfully play the video games with them.” He continued, “I am still gathering the details, but we will be playing on Pakistani servers then going to Afghan servers to play fortnite.” Mashkooor then clarified, “We will need to get visa in Pakistan, and the brothers will squad up with us once we land in Afghanistan.” Based on the context of this conversation, I understand Mashkooor was discussing traveling through Pakistan to get to Afghanistan. Mashkooor further advised OCE-1 that OCE-1 should “buy Afghan/Pakistani clothes if possible” so as not to stand out.

42. Beginning in 2023, Mashkooor also spoke on MMA 1 with another FBI employee acting in a covert capacity online (“OCE-3”), who posed as a fellow ISIS supporter. The initial conversation occurred on MMA 1 using MMA Account 1. Mashkooor confirmed to OCE-3 his desire to “go next month in the holy month of Ramadan” but getting his parents’ permission had been difficult. Mashkooor stated that he would turn eighteen “in about 8-9 months.”

43. Then, in early March 2023, Mashkooor spoke to OCE-3, and, based on the context, indicated that an ISIS contact suggested to Mashkooor that Mashkooor conduct an attack in the United States. In particular, Mashkooor told OCE-3, “Im gonna talk in c.0.d.e” for “safety reasons,” and explained, “I had finally gotten a contact from a brother playing fortnite in those rare servers, but he told me the situation wasn’t good, he was right, the enemy players have been raiding the houses everyday and martyring our gamer friends.” Mashkooor continued, “[h]e told me because I was in America it would be better for me to play fortnite here, which was something I considered as a last effort, if I couldn’t make it to their servers.” However, Mashkooor stated, “the thing is it would be affect my family even harder here.”

44. After OCE-3 indicated that talking in code could cause misunderstanding, Mashkooor clarified, “I’ve been planning to make h!jr@ to the group that we like to for some years now, after preparing and saving [cash emoji cash emoji] for them and all this when I got a contact he told me that it would be better for me to conduct something here rather than over there with them.” Mashkooor again expressed concern that “it would also have a more negative impact on” his family. Mashkooor later apologized for using “the fortnite code,” and explained that he used code “since [his] old group chat all of them got arrested.”

45. During that conversation, Mashkooor also expressed confusion about whether “to migrate in Ramadan.” Then, in mid-March 2023, Mashkooor informed OCE-3 that he decided not



to travel during Ramadan because he still had work to do and the “situation over there isn’t good enough yet.” Mashkooor acknowledged that he would not be able to come back, which is why he needed to “prepare fully as much as possible.” Mashkooor reiterated that “doing H is also better for the safety of my parents than carrying out an operation here.”

***After Ramadan, Mashkooor’s travel plans became less clear and he considered marriage, but hijrah remained his goal***

46. After Mashkooor decided not to travel during Ramadan, his plans became less clear for a period of time. In chats with OCE-1 and OCE-3 on MMA 1, Mashkooor expressed varying levels of boredom and depression during this period. Although at times he reported that he was “less excited” about making hijrah, at other times he indicated that it remained his ultimate goal.

47. During this period of time, Mashkooor also told OCE-1 and OCE-3 that he had a desire to get married either in the West or, if necessary, to a “foreign girl.” Mashkooor expressed his hope that he would find a wife who would make hijrah with him. Mashkooor indicated that he had started meeting with potential marriage prospects through his family and religious community.

48. In early June 2023, Mashkooor continued to express to OCE-3 on MMA-1 that things weren’t going well for him, but maintained that he still planned to “make H,” referring to hijrah. Around this time, Mashkooor also discussed a desire to get married, find a job, and complete his schooling. During one conversation with OCE-3 on MMA-1 in June 2023, Mashkooor told OCE-3 that Individual 1, who had been “helping [Mashkooor] prepare for H,” was asking if he (Mashkooor) knew “any brothers” who were “interested as well.” Mashkooor asked OCE-3 to send him any contacts who might be interested. When OCE-3 asked what happened to Mashkooor’s education, work, and marriage plans, Mashkooor said he was “still figuring it out” but that it would be “perfect” if he could “find a wife who can make H” with him. He worried, however, about the possibility of abandoning her in Afghanistan “after [he’s] martyred or something else.” Based on

Mashkooor's reference to being martyred, OCE-3 asked Mashkooor if he intended to fight. Mashkooor replied "What else would I be there for brother?"

49. I have reviewed a publication from a known ISIS media organization which was circulated around July 2023. In that publication, the ISIS media organization listed an MMA 1 account with an embedded hyperlink as a point of contact. The MMA 1 account listed in that publication is consistent with the name Mashkooor used in June 2023 to refer to Individual 1.

50. Then in July 2023, Mashkooor told OCE-3 on MMA 1 that he was no longer pursuing his GED, and that "his main goal is and will always be to make hijra to dar al-Islam." Mashkooor also expressed his hope that he would find a wife who would make hijrah with him. When OCE-3 explained that things may not be easy in dar al-Islam and questioned Mashkooor's plans to take his wife to a third world country, Mashkooor responded:

I am not going to have an easy life. From the very moment I came onto this manhaj my one goal was clear and that was to abandon pursuing any form of life here in dar ul kufr to go f!ght with my muwahidin brothers in my home country. The prospect of a wife makes no different as if Allah wills and she is upon manhaj her goal will be the same as mine. From the start I stopped caring about these things and was ready to leave everything behind to make H. The only things stopping me back then was my legal age issue and I was being more watched back then but now I'm cleared Alhamdulillah and wether or not I marry here first or go there and marry doesn't matter. Staying here even another second is torture and I've only been putting up an act to please those around me but what will any of it matter once I'm 18 and gone to dar ul H?

51. In late October 2023, Mashkooor reiterated to OCE-3 on MMA 1 that he wanted to "migrate but marry as well but neither are happening." He described his unsuccessful efforts to find someone to marry in the West, and expressed "fear" that if he "migrate[d] first before getting married the brothers over there may not help [him] get married and may just make [him] do something without caring about [his] needs for marriage." Mashkooor confirmed, however, that he wanted "shahada" and was "not a coward," but he wanted a "wife and kids first" so that he could "leave behind a family that worships Allah." Mashkooor explained to OCE-3 that he was previously

“100% ready to migrate and felt so confident,” but his “confidence went down” “when Ramadan came” and all his “close brothers got arrested” and he “wanted to get married.”

***As Mashkoor’s eighteenth birthday approached, he began to make more concrete plans to travel to join ISIS and encouraged OCE-1 to plan coordinated travel through Individual 1***

52. Then, on approximately October 29, 2023, Mashkoor told OCE-3 on MMA 1, “Soon I will be departing.” He explained that he had decided that there was nothing left for him in “dar ul kufr.” Mashkoor told OCE-3, “I even spoke to my shakyyh about it. I was very open about my beliefs making it very obvious I support D but I never said it straight up. He was against it and so is [Relative 1] but I don’t care.” Mashkoor told OCE-3 that he planned to leave in less than a month and travel through Dubai with the help of his family, and would either get picked up by his family or “the brothers” in Afghanistan. He further explained that he would get a visa and flight to Kabul while in Dubai, and would possibly stay in a hotel there for a couple days. Mashkoor also mentioned that he wanted to meet up with OCE-1 in Dubai to travel together. When OCE-3 brought up the topic of marriage, Mashkoor said, “Yeah brother about that I can’t stand another day of humiliation living in dar ul kufr and if it’s not meant for me to marry a girl here first then oh well what can I do.” He continued, “I’ve been so depressed about it and it’s been making my thoughts about Hijra harder so it’s better for me to ignore it for now.”

53. Mashkoor and OCE-3 talked again later that day and Mashkoor expressed that he was scared about how his hijrah would go. In particular, he explained “I’m scared if the murtadeen will hurt me right away before I get to experiment life with brothers upon the manhaj or with a wife. I’m afraid that the brothers there might not support me in getting married and may just strap something on me and throw me out into the field.” Mashkoor’s concern was based on the fact that there were “so many less brothers in khurasan after the taliban did raids in the summer,” which

could make them “desperate” and “force [him] to go on an operation earlier than when” he wanted to go. OCE-3 told Mashkooor, “if you do not feel that you are ready for hijra and marriage, then perhaps these two are not for you.” OCE-3 further told him “strapping on a vest is not for everyone . . . [a]nd if you think it’s not for you, then don’t do it.”

54. Separately, around this time, Mashkooor encouraged OCE-1 to travel with him. In particular, Mashkooor gave OCE-1 the MMA 1 account information for Individual 1, who, as explained above, had been “helping [Mashkooor] prepare for H.” Then, on October 31, 2023, Mashkooor told OCE-1 on MMA 1, “I need you to try and sort this out quickly with me because I plan to depart very soon and I want to possibly align my plan with yours in sha Allah.” On November 1, 2023, Mashkooor told OCE-1, “Brother, please don’t take too long to respond because this is a very time sensitive thing that I have been planning for years now.” Mashkooor indicated that he could “maybe get Dubai visa” but could not go through Pakistan.

55. In November 2023, Mashkooor continued to discuss concrete steps he was taking in preparation to travel, including getting vaccinations. In particular, on November 2, 2023, Mashkooor asked OCE-1, “Have you gotten your shots? You may need to get shots for malaria and other diseases because they are very prevelant over there.” Mashkooor continued, “I need to get mine I still haven’t gotten mine and once I do I’m gonna book my tickets to Dubai 2-3 weeks ahead in sha Allah so sometime mid-late November.” After OCE-1 confirmed on November 5, 2023, that OCE-1 was set to get shots that week, Mashkooor replied, “My shots is this week too.” On November 6, 2023, Mashkooor was observed going to Health Clinic 1 located in Boulder, Colorado, which is advertised as a travel clinic that provides vaccinations for travelers. On November 10, 2023, however, Mashkooor indicated that he still had not received his shots. Mashkooor was again observed going to Health Clinic 1 on November 13, 2023. On November 15,

2023, Mashkooor told OCE-3 that he “got [his] shots”—i.e., “flu, meningitis, typhoid fever, tetanus”—and “medicine for traveling overseas.”

56. On November 6, 2023, Mashkooor told OCE-1 that Mashkooor had not told his family the purpose of his travel. In particular, Mashkooor told OCE-1, “My family know I am leaving but don’t know why and they are very sad and it’s been having a toll on my mental health.” He told OCE-1, “I don’t know how to properly say my final goodbyes to them or how to convey the reasons why I left without comprising myself.”

***Individual 1 provided information to OCE-1 regarding possible travel paths for hijrah***

57. After Mashkooor insisted that OCE-1 contact Individual 1 on MMA 1, on October 31, 2023, OCE-1 reached out to Individual 1. OCE-1 told Individual 1 that “Abu Yassin”—i.e., Mashkooor—had indicated Individual 1 was “a good brother” who could help OCE-1. Individual 1 replied, “Okay akhi . . . how can I help? . . . do you want to support our cause?” OCE-1 responded that he wanted to join the brothers.

58. Then, on November 2, 2023, Individual 1 asked OCE-1 if OCE-1 could travel to Turkey or Iran. OCE-1 responded that Turkey would be better. Individual 1 then told OCE-1, “I shall let u know In Shaa Allah.” When asked whether the “door to Khorasan”—in other words, Afghanistan—was open, Individual 1 replied, “Yes akhi . . . Are u serious about making hijra? . . . We can help.” OCE-1 confirmed to Individual 1 that OCE-1 was serious.

59. OCE-1 again reached out to Individual 1 on early December 2023, indicating a possible interest in traveling through Dubai. In response, Individual 1 asked if OCE-1 could get a visa for Iran or Pakistan. Individual 1 also asked OCE-1 if OCE-1 could send cryptocurrency before making hijrah.

***In November 2023, Mashkooor indicated that he wanted to travel to Syria instead and requested a contact to help him do so***

60. Around November 2023, Mashkooor started discussing with OCE-1 and OCE-3 the possibility of traveling to Syria instead of Afghanistan to join ISIS. On November 6, 2023, Mashkooor asked OCE-1, “If you had a chance to go to make Hijra to the brothers in Syria or Afghanistan which would you choose.” Mashkooor indicated that he was having “second thoughts about going to Afghanistan” because the situation in Afghanistan was “chaotic.” Mashkooor told OCE-1 that he would “prefer to go to shaam”—which I know to be a reference to Syria—but that he did not have a contact there.<sup>17</sup>

61. That same day, Mashkooor told OCE-3 that Mashkooor was “having second thoughts on making H to Afghanistan” and wanted to “make H to sham” but “had no contacts in Syria.” Mashkooor also noted that he did not “have an H buddy for sham.” Mashkooor then asked if OCE-3 knew “someone who helps with H there.” When asked why he did not want to travel to Afghanistan, Mashkooor replied, “I’m gonna be honest with you Afghanistan is not a very good place to live and I’m not used to it’s conditions especially now with all the refugees coming in from pakistan things will be chaotic.” Mashkooor added, “I’m still not sure how the situation is there with the brothers.”

62. In a later conversation, OCE-3 asked Mashkooor what skills Mashkooor would be able to provide if he were to travel to Syria. Mashkooor indicated that he didn’t “have any special skills,” but then followed up by explaining: “I want to be a fighter of course. In sha Allah. I also have a small amount of money saved up that if safely done I can maybe try to give to the brothers

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<sup>17</sup> I understand “”shaam” or “Sham” to be a reference to Syria. “Al Sham” translates to the greater Syria region.

there that was originally going to go to the brothers in khurasan but things got messed up remember?”

63. Then, on November 10, 2023, Mashkooor told OCE-3 that he told Relative 1 “about possibly going to sham instead of Afghanistan and she was extremely upset,” so Mashkooor was “just going to stick with Afghanistan.” Mashkooor continued to indicate, however, that he wanted “to go to sham.” Mashkooor stated, “I could tell my family I’m going to Afghanistan to calm them down but secretly book other tickets, or, book tickets once I land in Dubai and stay there for a week or two until I fly.” After Mashkooor went back and forth about where he wanted to travel based on Relative 1’s reaction, OCE-3 indicated that he had a contact in Syria who Mashkooor could talk to, but only if Mashkooor was serious about going to Syria. In that conversation, Mashkooor asked OCE-3 if OCE-3 could “ask the brother if there is a safe crypto transaction process to send them money to the brothers in Syria” because Mashkooor had turned 18 and could “use crypto.” OCE-3 told Mashkooor that OCE-3’s Syria contact could also assist with sending cryptocurrency.

***In late November 2023, Mashkooor’s plans reverted to traveling to Afghanistan to join ISIS***

64. On November 11, 2023, Mashkooor told OCE-3 that “because of [Relative 1]” he would “have to just settle for Afghanistan.” He continued to express an interest in talking to OCE-3’s Syria contact and sending cryptocurrency in the meantime, although he told OCE-3 that he did not yet know how to send cryptocurrency.

65. In that same conversation, Mashkooor said, “Make dua that Allah allows me to kill many of the enemy with my own hands. I have no problem with the muj attacking Shia temples but to be honest that isn’t really enough action for me. I wanted to go to sham to specifically kill the worst of mankind (nusayri filth and yazidi Kurdish devil worshippers).”

66. On November 15, 2023, OCE-3 asked Mashkoor about his hijrah plans. Mashkoor responded that he was “waiting to book” because things didn’t “seem complete” and Mashkoor felt “odd.” Mashkoor explained further, “I feel like something is waiting for me from Allah swt around the corner and I just don’t know what it is.” When asked if he had mapped his route yet, Mashkoor indicated that he needed to speak with Individual 1 because “it’s constantly changing the situation on the ground and with the airports.” OCE-3 suggested that Mashkoor could travel through Turkey instead of Dubai, but Mashkoor said he had “no one in Turkey” and had an uncle in Dubai. From there, Mashkoor said that, according to his discussions with Individual 1, he would “stay with the brothers in katiba.”<sup>18</sup>

67. OCE-3 then asked what Mashkoor expected when he arrived in Afghanistan. Mashkoor replied: “Worst case scenario, they throw a vest onto me right away and send me to a Shia temple to attack them. Worst case because I don’t want to do that.” When asked if he would do that, Mashkoor said, “I hope they don’t want me to do that. I want to be a fighter. Using actual weapons. And doing attacks on the worst of the kuffar, like the leaders or high positions of the taliban. . . . Or Chinese/other foreign diplomats.”

68. After OCE-3 complimented Mashkoor’s ambitions, Mashkoor responded, “Please don’t say such things,” and added, “if I don’t ever act on my words it will make me a big hypocrite and a coward.” OCE-3 assured Mashkoor that it wouldn’t make him a hypocrite and that “change happens to the best of us.”

69. On November 22, 2023, Mashkoor told OCE-3 that he was in “quite a predicament” because the possibility of marriage had “open[ed] up” for him again and “the door for H [was]

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<sup>18</sup> “Katiba” translates to “battalion.”



becoming odd and unsure.” As Mashkooor explained, “[t]hings keep changing so suddenly.” He indicated that “some” of his marriage prospects were in Dubai.

70. In that same conversation, however, he discussed issues that he was having at the mosque he attended, which may cause him to be “kick[ed] . . . out.” In Mashkooor’s view, if that happened, it would be “even more reason for [him] to make H now” because if he could not “go to the masjid anymore then it’s for sure even more haram” for him to remain in the United States because he would be unable to “complete [his] Islamic duties.”

***On November 25, 2023, Mashkooor booked his travel to Dubai and subsequently indicated to the OCEs that he planned to go to Afghanistan from there, to join ISIS***

71. On November 25 2023, Mashkooor booked a plane ticket with the ultimate destination of Dubai, with stops in New York (JFK) and Kuwait. The departure date from Denver was scheduled for December 11, 2023.

72. As discussed above, on multiple occasions Mashkooor had previously told the OCEs that Relative 1 would support his travel if he traveled to certain destinations, including Dubai—where he could obtain a visa to enter Afghanistan—and then continued on to Afghanistan. Mashkooor told the OCEs at various times that he did not, however, plan to tell his family the true reason for his travel.

73. Between mid- and late-November 2023, Mashkooor’s attempts to plan travel with OCE-1 slowed down after OCE-1 indicated to Mashkooor that OCE-1 may not be able to travel for a while. However, on November 30, 2023, OCE-1 reached out to Mashkooor to let Mashkooor know that Individual 1 told OCE-1 to travel through Turkey. Mashkooor responded, “[i]f he said that then okay. brother it’s up to you. I booked tickets to Abu Dhabi actually and I’m going to be there soon in sha Allah.” Mashkooor then continued, “[a]fter staying there for a bit I will most likely fly from there to Kabul.” Mashkooor indicated that he did not know how long he would stay in Abu

Dhabi before flying to Afghanistan. Mashkooor also told OCE-1 that if Mashkooor was “able to go soon” he would let OCE-1 know “how things are” so that OCE-1 would have a “general idea of what it’s like.”

74. Abu Dhabi is approximately 93 miles from Dubai in the United Arab Emirates. As discussed above, although Mashkooor’s airline ticket had a destination of Dubai, in my training and experience, I know that Mashkooor could travel from Dubai to Abu Dhabi by car and that the trip would take approximately 1.5 hours. Mashkooor could also obtain a visa for Afghanistan in Dubai or Abu Dhabi, where Afghanistan has an embassy.

75. On December 1, 2023, after informing OCE-3 that Mashkooor scheduled tickets to travel to Dubai, Mashkooor explained that he had not yet booked his onward travel to Kabul because “[t]he brother said” that “[t]he situation changed a lot,” “[s]o he told [Mashkooor] to wait to tell him when to book to make sure everything goes okay.” Mashkooor confirmed to OCE-3 that “the brother” who gave him that direction was Individual 1. Mashkooor also mentioned that Mashkooor had “some business in the Emirates with family” so Mashkooor may “be there for a little bit.”

76. Similar to his conversation with OCE-1, during that December 1, 2023 conversation with OCE-3, Mashkooor mentioned the possibility of being “a facilitator for western supporters who want to make H.” Mashkooor explained, “When I say that, I mean I can get a feel of what’s it’s like, so when brothers want to make H you can put them in contact with me, and I can try to help them and make them feel less isolated and nervous about it.” OCE-3 responded that it sounded like Individual 1 might have other plans for Mashkooor that did not require Mashkooor to be a suicide bomber, to which Mashkooor replied, “I honestly have no clue still what to expect. But I am trying to be more positive about it.”

***In November and December 2023, Mashkooor expressed his intention to send money to ISIS in Syria and took steps to allow him to do so***

77. As noted above, in November 2023, Mashkooor asked OCE-3 if OCE-3's contact could help with sending cryptocurrency to "the brothers" in Syria. Mashkooor had previously indicated his intent to send money to support ISIS before making hijrah on several occasions. In particular, in mid-March 2023, Mashkooor told OCE-3 on MMA 1 that he wanted to send "money over time to the brothers" before he traveled. Mashkooor explained that he could not yet use cryptocurrency because of his age, but that he had "v bucks to send" and wanted to find a way to send them encrypted to someone who could then turn it into cryptocurrency and send it to "the brothers in khurasan or sham or iraq." Mashkooor said that the v bucks would be used to "buy some nice new fortnite skins." When asked if the money would actually be sent through Fortnite, Mashkooor replied "[n]o brother, v bucks is code for money." Mashkooor then quickly deleted that comment.

78. Then, in approximately May 2023, Mashkooor again told OCE-3 on MMA 1 that he would not "make H," referring to hijrah, until he sends "all the money" because once Mashkooor is in Khorasan "it will be near impossible to do so." He continued to explain that he could not send money via cryptocurrency, likely due to his age. At the time, Mashkooor was seventeen.

79. Based on Mashkooor's request for a contact to send money to ISIS fighters in Syria, on November 13, 2023, OCE-3 provided Mashkooor with the MMA 1 username for OCE-4. Mashkooor, however, did not immediately reach out to OCE-4. As Mashkooor explained to OCE-3, before he could send money he had to "get [Relative 1] off of [his] account"—referring to his bank account—because, until then, she could "see whatever purchases" Mashkooor made and would know what he was doing "with the crypto." On November 19, 2023, Mashkooor told OCE-

3 that Mashkoor would have to go to the bank to remove her from the account, which he could not do “for at least another week.”

80. Mashkoor was observed going to Bank 1 with Relative 1 on November 17, 2023 and November 29, 2023. On December 1, 2023, Mashkoor told OCE-3 that he “finally got [Relative 1] off [his] bank account” by going through a “whole long process” at the bank.

81. During that December 1, 2023 conversation, when OCE-3 asked Mashkoor whether Relative 1 was aware of Mashkoor’s “crypto donations,” Mashkoor replied, “She pretty much does because she cried a little after I changed the stuff and then she said ‘you are not allowed to send money to any bad people’ even though I didn’t mention crypto at all.” Mashkoor added, “She has always been very suspicious of me ever since I started being a supporter.”

82. On December 3, 2023, OCE-4 reached out to Mashkoor, who responded that Mashkoor was “going to message” OCE-4 but “didn’t want to disturb” OCE-4 since Mashkoor did not “have everything fully ready yet.” When asked if Mashkoor knew where OCE-4 was located, Mashkoor replied, “Im assuming in S? I understand completely the risk of us contacting each other so I want to try and be discreet as possible.”<sup>19</sup>

83. Mashkoor then explained that he recently “went through a process” to “remove [Relative 1’s] access to” his bank account and was still waiting for his card to arrive before he could “do anything regarding money transfers.” He said he was “very new to all of this” and had “no clue how any of it works.” Mashkoor told OCE-4 that he hoped his card would arrive before he left for the Middle East.

84. Mashkoor and OCE-4 later discussed the logistics of sending money, including whether it should be sent via cryptocurrency or another method. When Mashkoor asked whether

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<sup>19</sup> In this context, I understand “S” to refer to Syria.

he should send the money from the West or when he was in the Middle East, OCE-4 replied that Mashkooor could do whatever was easier. OCE-4 told Mashkooor that there was a “big push recently” to collect money that would go to “medical equipment gear for the field equipment for the field you can probably imagine what kind [gun emoji] but also clothing for the field.” Mashkooor replied, “In sha Allah brother. I am just very nervous regarding all of this. A brother I know told me to download an app called [Cryptocurrency Exchange 1] for the crypto but he didn’t help me set it up. Should I use something else? Also, I am using an iPhone with a VPN.” The direction to download that particular cryptocurrency application did not come from an OCE.

***In early December 2023, Mashkooor reiterated to OCE-4 his plans to make hijrah to Afghanistan using his contact who helps with migration to Khorasan—i.e., Individual 1***

85. In his conversations with OCE-4, Mashkooor also told OCE-4 the specifics of Mashkooor’s upcoming travel plans. In particular, Mashkooor said, “If the brother didn’t tell you I am making H to Afg via a gulf country.” When OCE-4 asked about his travel plans, Mashkooor said, “I have family in the gulf country I am going to do they will help me and also I have the main contact who helps with migration to khur@\$@.”<sup>20</sup> I understand this to be a reference to Individual 1. Mashkooor explained, “I am of Afghan descent and I have family there so it makes more sense for me to go and it’s also easier but still I would be happy to be apart of the project in S. If I can at least help out the brothers with baytul’maal that is sufficient for me.”<sup>21</sup>

86. When asked when he was “making h,” Mashkooor replied, “[i]n about a week in sha Allah.” When OCE-4 expressed excitement for Mashkooor, Mashkooor replied, “I’ve been wanting to go for so long now I don’t know if I feel more excited or nervous. It’s been very stressful on me

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<sup>20</sup> I understand Mashkooor to be referring to Khorasan.

<sup>21</sup> “Baytul’maal” translates to “house of money” or “house of wealth.” I understand this to refer to Mashkooor’s plans to send money in support of ISIS.

with my family they haven't been taking the fact that I'm leaving well and they've been very emotional about it." Mashkoor told OCE-4, "I've been wanting to go for about 2 years now. I had a bunch of H buddies but each of them were arrested and now I lost all of them. One of them I think was even martyred in Afg but I never got confirmation."

87. Mashkoor then asked OCE-4 if "the brothers in S ever have contact with their family again or is it limited for security reasons?" After OCE-4 told Mashkoor that "[i]t depends," Mashkoor said he hoped to be able to stay in contact with his family "because the security over there isn't as bad" and that they would think Mashkoor was "just tourist visting [his] family." He similarly indicated that his family in Afghanistan was "unaware of [Mashkoor's] true reasons for going there."

***In the week before his then-scheduled travel on December 11, 2023, Mashkoor discussed his pre-departure preparations, including possibly writing a journal entry for Relative 1 regarding Mashkoor's pledge to the leader of ISIS***

88. Mashkoor continued to discuss with OCE-3 preparations Mashkoor was making before his travel that was then scheduled for December 11, 2023. In particular, Mashkoor told OCE-3, "I just went through my childhood things with [Relative 1] and she keeps breaking down to tears." Mashkoor further said, "I wrote a little memoir inside an old journal of mine with my pledge to amirulmum. I hope she finds it after I leave so maybe she gets a little more clarity."<sup>22</sup> Mashkoor explained that he did not want Relative 1 to find the journal before he left but that she would easily find it after he was gone. Mashkoor also wondered whether he should "leave behind a message for" his father, but told OCE-3 that it was difficult for him to do so. Mashkoor explained that when he tried "to think of something to say to" his father his "throat clenches and nothing

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<sup>22</sup> I understand this to be a reference to "Amir ul Mumineen," which means "Commander of the Faithful" and is used to refer to the leader of ISIS.

comes out.” OCE-3 acknowledged how difficult this has been for Mashkooor, and suggested that he write everything down so that Relative 1 could possibly share it with his father.

89. During that conversation, OCE-3 also suggested that Mashkooor could make a video recording, which Mashkooor confirmed he had considered. Mashkooor told OCE-3, “I was maybe gonna trust someone to keep the video and then send it once I left but I’m just afraid the feds might be keeping track of all my online stuff and they could use it all as evidence against me if they catch me before I leave (Allah swt forbid).” OCE-3 offered to keep the video for Mashkooor, if Mashkooor decided to make one, and Mashkooor agreed to think about it.

90. On December 6, 2023, Mashkooor asked OCE-4, “I don’t know if brothers asked you this before, but what’s the best way to leave a message behind for the parents? Like no watered down version, the full thing explaining why I’m migrating and my goals? I tried to write some things down for [Relative 1] but it wasn’t enough and I didn’t even do something for my father yet.” Mashkooor continued, “Im thinking of doing a video for each of them but im afraid the feds can get a hold of it before i leave. I wouldn’t basically made a video for each of my parents and then I would give them to someone I trusted who would send them to my parents after I left.” OCE-4 offered that Mashkooor could send the videos to OCE-4 but that it was up to Mashkooor. Mashkooor responded that he was “thinking about it” and wanted to be safe because “Allah swt forbid the feds could be tracking my online activity and could be waiting for me to do something like that with a video to have evidence on me.” Mashkooor added that he might wait to make the video until he arrived in “the gulf country” he was traveling to.

***On December 10, 2023, Mashkooor postponed his travel due to illness***

91. On December 10, 2023, Mashkooor informed OCE-4 that Mashkooor was ill and would “have to delay” his flight “another week.” That same day, his travel scheduled for December 11, 2023, was cancelled.

92. Despite having to delay his travel, Mashkooor continued to discuss with OCE-4 Mashkooor's desire to send cryptocurrency. During the same conversation on December 10, 2023, Mashkooor told OCE-4 that Mashkooor had his new card so when he "land[ed] in the gulf in sha Allah we can start the crypto process." Mashkooor then told OCE-4 that he could not "clear" his phone because he had to "keep certain things" but planned to "temporarily delete" MMA 1. Mashkooor asked, "When I am able to download apps again which app for crypto should I download?" OCE-4 provided Mashkooor with the names of two cryptocurrency exchanges—Cryptocurrency Exchange 2 and Cryptocurrency Exchange 3. Mashkooor asked, "[w]hich app is safer for me I'm using iPhone with no encryption and I could be getting watched I want to be safe." Mashkooor then told OCE-4 that he downloaded both apps. OCE-4 discussed methods of funding an account on Cryptocurrency Exchanges 2 and 3, and told Mashkooor that he could "wait" until he made it over—referring to Mashkooor's upcoming trip to the Gulf. When Mashkooor asked if he should make a Cryptocurrency Exchange 2 account, OCE-4 replied that Mashkooor could make it now to get it set up and see how it works.

93. On December 11, 2023, OCE-4 provided Mashkooor with a "[Cryptocurrency Exchange 2] address" that Mashkooor could use to "send it"—referring to cryptocurrency. Mashkooor confirmed, "I will let you know when I do it," and then asked, "[i]s it safe for me to save this somewhere in my phone until I'm able to use it?"

94. After delaying his travel, Mashkooor also sent OCE-4 a screenshot that included information about an area in Syria where there was "increased #IslamicState (#ISIS) activity." Mashkooor commented, "Things like this make me happy to see brother." Mashkooor then asked, "I am curious, if somehow I was able to actually meet up there with the brothers how would it be? Would I be in a Katiba? When I asked the brother who manages for khurasan this he didn't tell



me much at all. I know how my own country works but still, coming from the west leaving my family you can understand how I'm nervous and skeptical and I am curious about certain things." OCE-4 responded that OCE-4 could not provide details, but told Mashkooor that OCE-4 would be there when Mashkooor was ready and that they could meet in person to talk and go from there.

95. On December 13, 2023, Mashkooor confirmed to OCE-3 that he (Mashkooor) "delayed [his] trip a few days from now" because he had COVID. When asked if his plans remained the same—"West, Dubai, Afghanistan"—Mashkooor replied, "I'm considering possibly meeting with that brother you gave me his @ in S" (referring to OCE-4). Mashkooor continued, "But I'm not fully sure." When asked if Individual 1 knew about Mashkooor's delays, Mashkooor said he did not. Mashkooor explained, "[Individual 1] is waiting for my confirmation when I am coming if I still decide to."

96. That same day, after Mashkooor confirmed to OCE-4 that he (Mashkooor) had rebooked his flight, OCE-4 asked if Mashkooor was still going to the same place. Mashkooor responded, "Yes I'm still head to the gulf in sha Allah. but I don't know how long I'll be there." Mashkooor did not specifically respond to OCE-4's statement that OCE-4 wanted to make sure Mashkooor's contact—referring to Individual 1—still knew Mashkooor was coming.

97. In a later conversation, OCE-4 told Mashkooor that OCE-4 was happy for Mashkooor and that Mashkooor's travels brought back memories of OCE-4's journey to join the brothers. OCE-4 told Mashkooor that the most difficult part of the journey was having to leave OCE-4's family. Mashkooor responded, "In sha Allah my family will understand and as long as they do then I will be content at some point regarding them. I only hope that I'm successful in my mission from the beginning to the end I've dreamed about doing this for so long now the I've met so many good brothers along the way. It's not an easy path but it's a blessed one and I have no regrets."

98. On or about December 16, 2023, Mashkooor asked OCE-4 if it was okay for Mashkooor to bring his Afghan clothes if he ended up “coming to S.” Mashkooor added that he did not know what the “brothers” there wear. I understand Mashkooor’s reference to S to mean Syria.

***Mashkooor’s travel was rescheduled from Denver, Colorado to Sharjah, UAE for December 18 - 19, 2023***

99. On December 13, 2023, Mashkooor’s travel was rescheduled for December 18, 2023. In particular, his new travel itinerary is as follows: depart Denver, Colorado for New York, New York (LGA) at 11:16 am on December 18, 2023, on Airline 1; depart New York, New York (JFK) for Doha, Qatar the morning of December 19, 2023, on Airline 2; and continue on to a final destination of Sharjah, UAE, also scheduled on Airline 2. Relative 1—who Mashkooor told OCE-3 had rebooked Mashkooor’s flight for him—is scheduled to travel with Mashkooor to Sharjah, UAE. Relative 1 has a return flight booked on Airline 1 for December 30, 2023, from Dubai, UAE, to Newark, New Jersey, to Denver, Colorado. Mashkooor does not have return travel booked on Airline 1 or Airline 2.

100. In my training and experience, I know that Sharjah, UAE is less than 20 miles from Dubai, and approximately 100 miles from Abu Dhabi. As explained above, Mashkooor can obtain a visa to enter Afghanistan in either Dubai or Abu Dhabi.

***On December 18, 2023, Mashkooor was arrested at Denver International Airport***

101. On December 18, 2023, at approximately 8:01 am, Mashkooor was observed by law enforcement leaving the Westminster residence with Relative 1. At approximately 8:33 am, Mashkooor and Relative 1 arrived at Denver International Airport, where they exited what appeared to be a ride-share vehicle at the passenger drop-off area of Terminal West. Mashkooor and Relative 1 then stopped at a ticket counter for Airline 1 and checked bags.

102. Mashkooor, along with Relative 1, then proceeded to the TSA security area wearing a backpack. After Mashkooor passed through TSA security, but before he reached the train to the gates, he was taken into custody at approximately 9:04 am by the FBI on a probable cause arrest.

***On December 18, 2023, agents found in the Westminster residence journal entries written by Mashkooor***

103. On December 18, 2023, while executing a search warrant at the Westminster residence, law enforcement agents identified journal entries written by Mashkooor. The entries include drawings of the ISIS flag, along with handwritten text that states, “The Islamic State Remains with Allah’s Permission.” Another page includes, among other things: “Do NOT read until after I am in Watah!” Mashkooor, in handwritten text, goes on to explain that he has felt isolated since he was young, but then discovered that there were “others like” him. Later pages include handwritten text that states, among other things:

- “I fell in love with their steadfastness in the face of such animosity. The soldiers of monotheism, the mujahideen.”
- “From then on I decided I wanted to be like them. Leaving behind the hypocritical life of humiliation to migrate to the lands of jihad.”
- “So once again I state, that I have NO regrets about this blessed path decorated with thorns. And I hope to be granted one of two things. Victory over my enemies, or martyrdom.”
- The text of a bayat.

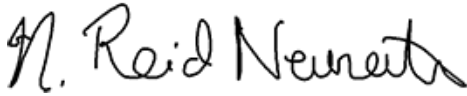
104. The final page ends with, “make dua that Allah accepts from me and that he forgives me and that he grants me martyrdom. I will never forget all that you’ve done for me and I’m sorry for how I treated you. Goodbye.” It is signed “Humzah.”

**CONCLUSION**

105. In summary, based on the above facts and information, I submit that there is probable cause to believe that HUMZAH MASHKOOR has violated Title 18, United States Code, Section 2339B.

s/ Kathryn Kempema  
Kathryn Kempema  
Special Agent  
Federal Bureau of Investigation

Submitted, attested to, and acknowledged by reliable electronic means this 18th day of December, 2023.



HON. N. REID NEUREITER  
U.S. MAGISTRATE JUDGE  
DISTRICT OF COLORADO

**Affidavit reviewed and submitted by Laura Cramer-Babycz, Assistant United States Attorney.**

DEFENDANT: Humzah Mashkoor

YOB: 2005

ADDRESS  
(CITY/STATE): Westminster, CO

OFFENSE(S): 18 U.S.C. § 2339B (Attempt to Provide Material Support or Resources to a Designated Foreign Terrorist Organization)

LOCATION OF OFFENSE: Adams and Denver Counties, Colorado

PENALTY: NMT 20 years' imprisonment; NMT lifetime supervised release, NMT \$250,000 fine; \$100 Special Assessment

AGENT: Kathryn Kempema  
Special Agent, Federal Bureau of Investigation

AUTHORIZED BY: Laura Cramer-Babycz  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less  over five days

THE GOVERNMENT **will** seek detention in this case based on 18 U.S.C. § 3142(f)(1)(A)

The statutory presumption of detention **is** applicable to this defendant.

OCDETF CASE:  Yes  No