

UNITED STATES DISTRICT COURT

for the

District of Colorado

United States of America)

v.)

DAVIN DANIEL MEYER)

Case No. 23-MJ-0121-SP

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief: On or about the date(s) of July 14, 2023, in the counties of Douglas 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 a Designated Foreign Terrorist Organization

This criminal complaint is based on these facts:

See Affidavit attached hereto and herein incorporated by reference.

X Continued on attached sheet.

s/ Joni Tangeman

Complainant's signature

Joni Tangeman, Task Force Officer, FBI

Printed name and title

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

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

Date: July 14, 2023

City and state: Denver, Colorado

Judge's signature

Susan Prose

United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Joni Tangeman, being duly sworn, hereby deposes and states as follows:

INTRODUCTION AND APPLICANT BACKGROUND

1. I seek a criminal complaint charging DAVIN DANIEL MEYER (“MEYER”) with one count of attempting to provide material support or resources (that is, providing himself as personnel) to a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B.

2. I am a Task Force Officer (“TFO”) on the Joint Terrorism Task Force with the Federal Bureau of Investigation (“FBI”) in the Denver, Colorado Field Office, and have been since November 2020. I have 29 years of Law Enforcement experience; 25 years of which has been as an Investigator with the Arapahoe County Sheriff’s Office. As part of my duties as a TFO, 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 material support or resources to designated foreign terrorist organizations). As a federal TFO, 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 arrest 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 MEYER.

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 an alleged 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. 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”). 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 entity 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,”¹ 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

¹ (U) The word, “hijrah” is the Arabic word for “migration” or “emigration.” When used by ISIS supporters, “hijrah” means traveling to join ISIS.

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.

PROBABLE CAUSE

9. In June 2022, Davin Daniel MEYER (“MEYER”), whose date of birth is in November 2004, was brought to the attention of law enforcement by an individual who knows MEYER,² who had observed MEYER’s radical Islamic beliefs escalate as MEYER sought out more extremist videos and content online and openly discussed his violent intentions. Soon after his 18th birthday in November 2022, MEYER began communicating with an individual online whom he believed to be an ISIS facilitator, but who was actually an FBI Confidential Human Source (“CHS-1”).³ Between November 2022 and July 2023, MEYER repeatedly discussed with CHS-1 MEYER’s radical Islamic ideology and his desire to provide support to ISIS by traveling to the Middle East to serve as a fighter for ISIS. Around December 2022, CHS-1 introduced MEYER to a second FBI Confidential Human Source (“CHS-2”), who purported to be an ISIS travel facilitator. MEYER then met three times in person with CHS-2—on December 9, 2022, February 3, 2023, and June 22, 2023—in the area of Castle Rock, Colorado, to discuss the efforts MEYER was making to fund and prepare for his travel to join ISIS.

² This individual is known to law enforcement.

³ During the course of this investigation, MEYER communicated with FBI Confidential Human Sources. CHS-1 and CHS-2, identified in this affidavit, received compensation and were reimbursed for their work in this case and other cases. Both CHSs have proven to be credible—an assessment based, in part, on their reporting being corroborated by audio recordings or screenshots of their online activities.

10. Over several months, MEYER obtained a passport and funding for his travel, researched and purchased various items he believed he would need as an ISIS fighter overseas, and planned his hijrah. On June 23, 2023, MEYER booked a flight, scheduled for July 14, 2023, from Denver via Munich, Germany, to Ankara, Turkey, where he believed he would meet with ISIS members and travel on to Iraq to join ISIS and become an ISIS fighter.

**In 2021, MEYER Began Expressing Radical Islamic Beliefs
and Articulating His Intent to Commit Violent Acts.**

11. In June 2022, an individual who knows MEYER contacted the Douglas County Sheriff's Office ("DCSO") concerning behavior and statements of then-17-year-old MEYER. The FBI was subsequently notified. Between June and November 2022, DCSO and/or FBI communicated with this individual on multiple occasions, during which he/she provided information regarding MEYER's violent threats to act upon his radical Islamic beliefs.

12. During these meetings with DCSO and FBI, the individual described that MEYER had previously followed white supremacist ideology but began practicing Islam, possibly as early as October of 2020. The individual explained that beginning in early 2021, MEYER began accessing more radical content online. The individual also described that MEYER attended an eight-month-long camp between 2021 and 2022 that focused on mental health and behavior treatment, and while there, he became more radical in his beliefs. The individual reported that MEYER had begun praying six times a day, and he frequently watched radical Islamic sermons online and listened to them on his phone when he took walks.

13. The individual reported to law enforcement that MEYER had told the individual that he wanted to travel to Syria and become a martyr, or if he did not make it to Syria, he wanted to kill people in the United States, including police and military members. The individual explained that

MEYER thought he had the resources to get to Syria where he would join the military, though the individual expressed uncertainty as to whether that was true. MEYER expressed to the individual the belief that the U.S. military is killing his Muslim people and that he is willing to kill himself and others. MEYER told the individual that his only plan for the future was to join the radical Islamic fight and that he wanted to die in his early twenties for Allah.

14. The individual informed law enforcement that MEYER had showed him/her a video MEYER found online. The individual described the video as depicting a child shooting a 22-year-old man in the head as punishment when the man was caught spying against an extremist group. The individual explained that when MEYER showed him/her the video, he explained that he believed killing the man was justified because the man had betrayed the extremist group by spying. The individual added that MEYER believed watching such videos was cathartic, although the individual recognized that MEYER's engagement with videos of people being killed was dangerous.

15. The individual told law enforcement that he/she believed MEYER's behavior was escalating and that the individual did not feel safe when MEYER discussed violent intentions. The individual talked about previous threats MEYER had made to kill him/her but added that he had not been physically violent with the individual and he/she did not believe that MEYER would act on his threats. The individual reported that he/she had a rifle and handgun secured in a safe in his/her home and that MEYER had made comments to him/her about getting access to the safe.

16. In October 2022, the individual informed the FBI that MEYER had stated that if he could not go to the Middle East, he planned to get fertilizer and build a bomb in the United States.

17. Based on information provided by the individual as well as records I have reviewed in the investigation, I am aware that MEYER has previously received mental health treatment,

including residential treatment programs. During treatment in 2021 and 2022, staff members reported that MEYER had said racist and hateful things to people of color, women, and Jews. The individual reported that MEYER refused to take any prescription medication prescribed by the psychiatrist because it would be against his Islamic religion, and he also refused to go to school or participate in online school programs. Records show that MEYER has received diagnoses of autism spectrum disorder; attention-deficit hyperactivity disorder; adjustment disorder with mixed anxiety and depressed mood; specific learning disorder with impairment in mathematics; and major depressive disorder, recurrent episode, moderate.

18. The individual told law enforcement that while MEYER practiced Islam, he refused to attend the local mosque because the imam did not let radical sects worship there. The individual explained that around July 2022, MEYER had expressed his anger at a local Colorado-based mosque for allowing females into the mosque. The individual gave DCSO copies of emails showing that on July 13, 2022, MEYER sent an email from MEYER's email address associated with the name "Abdul Rahman ibn Meyer" to the email address associated with the Colorado-based mosque. The subject line read, "Aqeedah of the imam,"⁴ and the body of the email was as follows:

I would like to know about the aqeedah of the imam so I may feel safe in praying behind him. If possible answering this over email would be best as I live far away from the masjid⁵ and typically only go there in time for Friday prayers, but if scheduling an appointment is a must then we can discuss that Insha'Allah.⁶ The main questions I would like to know his thoughts on are as follows:

⁴ "Aqeedah" is an Arabic word meaning "creed." An Imam is an Islamic leadership position. For Sunni Muslims, it is most often the worship leader at the mosque.

⁵ "Masjid" is the Arabic word for a place of Muslim worship known as a mosque in English.

⁶ "Insha'Allah," or "Inshallah," means "If God wills." It is said prior to something one would like to happen.

1. Where is Allah (SWT⁷)?
 2. His thoughts on democracy and the one who participates in it
 3. Does he make takfir⁸ upon the rafidah⁹ and other polytheists such as Sufis¹⁰ who ask for help from saints who are no longer in this world?
 4. Does he believe sharia¹¹ must be established in legislation today the same way it was established during the time of the Rashidun?¹²
- Jazakullahu khairan¹³

19. Based on my training, experience, and discussions with other investigators, I believe MEYER's questions are indicative of someone who subscribes to the Salafi-Jihadi ideology, which is the ideology of many supporters of ISIS and other Sunni extremist groups.

20. On or about July 20, 2022, MEYER received a response to his email from a representative of the Colorado-based mosque, which stated, "A code of conduct violation notice has been attached to this email. If you have any questions, you can reply back to this email and all parties copied on the reply." The attached code of conduct violation stated, "...It has come to our attention that you have been trying to intimidate the IMAM by questioning his Aqedah.... This letter

⁷ "SWT" is shorthand for "Subhanahu wa ta'ala" which translates to "Glory to him, the exalted" indicating reverence and devotion to God.

⁸ "Takfir" is an Arabic word meaning "excommunication" from Islam and accusing another Muslim to be an apostate.

⁹ "Rafidah" is an Arabic word meaning "rejectors" and is a pejorative term used by ISIS supporters when referring to the Shia sect of Islam.

¹⁰ Sufi, or Sufism, is a sect of Islam known for mysticism and belief they can become closer to Allah through inner purification and introspection.

¹¹ Sharia is the Islamic law based on the teachings of the Qur'an and traditions of the Prophet Muhammad.

¹² Rashidun refers to the first four successors (caliphs) who led the Muslim community following the death of Prophet Muhammad.

¹³ "Jazakullahu khairan" is an Islamic expression of gratitude meaning "May Allah reward you with goodness."

is a formal notice to inform you that your behavior has violated the code of conduct and to consider this a warning...”

21. On or about July 20, 2022, MEYER emailed the Colorado-based mosque again, stating, “My apologies, Wallahi¹⁴ my intent was not to intimidate anyone. [The Imam] said it was haram¹⁵ to pray behind anyone who’s aqeedah was unbeknownst to you, that was my only motivation in asking. I’m sorry that you perceived it otherwise. I will not inquire about it anymore if you do not want to answer.”

MEYER Communicated Online with an FBI Confidential Human Source He Believed to Be an ISIS Facilitator and Expressed His Desire to Travel to Fight for ISIS.

22. Beginning on or about November 4, 2022, MEYER began using an online messaging application to communicate with an FBI Confidential Human Source who was posing as an ISIS facilitator (“CHS-1”). MEYER introduced himself as “Abdul Rahman al-Amriki,”¹⁶ stated that he was 18 years old, and immediately began discussing hijrah.

23. When CHS-1 asked MEYER why he wanted to travel for hijrah, MEYER stated:

¹⁴ “Wallahi” is an Arabic word meaning, “I swear by God.” A Muslim uses it to affirm what he is saying is true.

¹⁵ “Haram” means forbidden or proscribed by Islamic law.

¹⁶ It is common practice of jihadists groups in Syria and Iraq, including ISIS, to identify individuals as Americans or “al-Amriki” in Arabic. Rarely are ISIS-associated travelers referred to by their real, legal names within the ISIS community. Instead, they default to using the traveler’s “kunya,” or Arabic nom de guerre. I believe MEYER’s use of the kunya “Abdul Rahman al-Amriki” demonstrates his desire to attempt to obfuscate his true identity, while noting his nationality as American, which is consistent with the practices of jihadist groups such as ISIS.

I want to do hijrah because it is fard¹⁷ and so is jihad¹⁸ and I wish to live amongst the Muslims and fight for Dawlah.¹⁹ As for what I know, if you mean as in the process not too much. I'll be told which wilayah²⁰ to migrate to, go to a neighboring country (I believe) and then be smuggled across the border to Dawlah.

24. When CHS-1 asked if MEYER realized he'd be leaving an easy lifestyle, MEYER said, "If I give up something for the sake of Allah then He will replace it with something better."

When CHS-1 asked about jihad, MEYER stated that he understood he could be captured or killed, and said:

Jihad is wajib²¹ for all those capable and is the peak of Islam. As for the physical element, much difficulty will be involved. I can be injured or killed at any moment on the battlefield and environmental conditions can be very tough depending on the season and where I am. But if I am to carry through with it all sincerely then it will all pay off in the akhirah²² insha'Allah.

MEYER Pledged Allegiance to ISIS Leaders in Two Videos.

25. On or about November 5, 2022, MEYER told CHS-1 that he had pledged allegiance to ISIS, which MEYER referred to as "Bayah." In Islamic terminology, "Bayah," or "Bay'ah," is a pledge of allegiance to a specific leader, rather than to an organization. Abu al-Hasan al-Hashimi al-Qurashi was an Iraqi militant and third caliph of ISIS from March 10, 2022, until his death on October 15, 2022, which was publicly announced on November 30, 2022, by ISIS spokesman Abu

¹⁷ "Fard" is an Arabic word meaning "religious duty commanded by God."

¹⁸ "Jihad" can mean a struggle or fight against the enemies of Islam, or the spiritual struggles with oneself against sin. Jihad is an obligation incumbent on all Muslims to follow and realize God's will, lead a virtuous life and extend the Islamic community through preaching, education, example, etc.

¹⁹ "Dawlah" is an Arabic word meaning "state," and is often used by ISIS supporters as a shorthand reference to the Islamic State or ISIS.

²⁰ "Wilayah" is an Arabic word meaning "state" or "province."

²¹ "Wajib" is an Arabic word meaning "necessary," "obligatory," or "duty."

²² "Akhirah" is a term used in Islam to describe the belief in everlasting life after death.

Omar al-Muhajir. At that time, Abu al-Hussein al-Husseini al-Qurashi was announced as the new leader of ISIS.

26. MEYER clarified to CHS-1 that he had pledged “bayah to Dawlah²³ yes” and stated that he had given his bayah to “Amir ul Mumineen²⁴ Abu al-Hassan al-Hashimi al-Quraishi.” MEYER further explained that he had given bayah in his own presence but had not yet shared it with anyone as he, “did not have anyone trustworthy to share it with.”

27. On or about November 6, 2022, MEYER messaged CHS-1, stating, “I have made my decision, I wish to go through with this insha’Allah.” MEYER then sent CHS-1 a video, and wrote, “Here is my bay’ah.”

28. I reviewed the video provided by MEYER. An image of the video is included below:



²³ “Bayah to Dawlah” means a pledge of allegiance to the Islamic State, or ISIS.

²⁴ “Amir ul Mumineen” means the “Commander of the Faithful.” It refers to an ISIS leader.

I have watched the above-described video, and believe MEYER to be the individual depicted in the video based on a comparison to MEYER's State of Colorado Identification Card, his passport photo, and my observations of MEYER in audio and video recordings.

29. In the video, MEYER stated:

I give my bay'ah to Amir ul Mumineen, the Khalifa of the Muslims, the Mujahid²⁵ Sheik Abu al-Hasan al-Hashimi al-Qurashi. I pledge to listen and obey in what is pleasing and displeasing in times of ease and hardship selflessly, and to not contest the matter of authority with those in charge, unless I see clear kufr,²⁶ which I have proof from Allah for; and Allah is the witness to what I've said.²⁷

30. On or about December 2, 2022, which was soon after ISIS announced the death of ISIS leader Abu al-Hasan al-Hashimi al-Qurashi, MEYER asked CHS-1, "Is it true Amir-ul Mumineen has been martyred? If so should I send a video of a new bay'ah?" On or about December 4, 2022, MEYER sent CHS-1 a video in which he pledged bayah to the newly-announced leader of ISIS, Abu al-Hussein al-Husseini al-Qurashi.

31. I reviewed the second video provided by MEYER. An image of the video is included below:

²⁵ "Mujahideen" (plural) or "mujahid" (singular) is an Arabic word for a fighter. It is specifically translated as "one engaged in jihad and who fights against evil or enemies of Islam and advocates truthfulness."

²⁶ "Kufr" means disbelief in God, His Prophets and His religion.

²⁷ MEYER's pledge of allegiance text follows a generally standardized text used by ISIS supporters worldwide.



I have watched the above-described video, and believe MEYER to be the individual depicted in the video based on a comparison to MEYER’s State of Colorado Identification Card, his passport photo, and my observations of MEYER in audio and video recordings.

32. In the video, MEYER stated:

I give my bay’ah to Amir ul Mumineen, the Khalifa of the Muslims, the Mujahid Sheik Abu Hussein al-Husseini al-Qurashi. I pledge to listen and obey in what is pleasing and displeasing in times of ease and hardship selflessly, and to not contest the matter of authority with those in charge, unless I see clear kufr, which I have proof from Allah for; and Allah is the witness to what I’ve said.

MEYER Repeatedly Expressed His Intentions to Join ISIS and Explained Why He Wanted to Support This Foreign Terrorist Organization by Traveling to Fight.

33. Between November 2022 and June 2023, MEYER continued to communicate with CHS-1 online about his plans to provide support to ISIS in the form of traveling to Iraq to become a fighter. During this time period, MEYER also met three times in person in Colorado with a second confidential human source (“CHS-2”), whom MEYER believed to be an ISIS-affiliated travel facilitator and who was introduced to MEYER by CHS-1. Throughout his conversations online with

CHS-1 and in each in-person meeting with CHS-2, MEYER reiterated his intent to become a fighter for ISIS and explained the reasons for his desire to make hijrah.

34. On December 9, 2022, when MEYER met with CHS-2 for the first time in person, MEYER introduced himself as Abdul Rahman and explained that he was 18 years old and not in school. MEYER articulated to CHS-2 how he developed his radical Islamic beliefs, explaining the various philosophies and religions he studied before settling on Islam, which he said he had learned was the most preserved religion. MEYER explained how he had researched Sufism and different sects of Islam, specifically Salafism.²⁸

35. During that meeting, MEYER discussed with CHS-2 his understanding of the difficulty of hijrah, stating, “I looked up excuses to remain behind for...hijrah. I wanted to go but I did realize it’s gonna be hard so I looked...the excuses did not apply to me...so I established it was wajib.” When discussing what MEYER expected to contribute to ISIS, he stated:

You know, fighting would be one thing...I’m content with no other life...besides from hijrah and...living amongst the Muslims doing jihad and I would be willing to fight. I would be willing to take up arms. I would be willing to do whatever is needed from me.

36. MEYER stated, “Maybe the only thing I might, you know, hold back is if I immediately get there and they say can you do a *Istishhad*...a martyrdom.”²⁹ CHS-2 asked MEYER about his access to weapons. MEYER stated an individual he knew “has guns which I don’t have access to.”

²⁸ Salafism or the Salafi movement is a revival movement in Sunni Islam touting the return to traditions of the “pious predecessors” (salaf). As described above in paragraph 19, Salafi-Jihadi ideology is the ideology of many supporters of ISIS and other Sunni extremist groups.

²⁹ “Istishhad” is the Arabic word for “martyrdom.” I am aware that militant groups use this term to describe attacks on military or civilian targets in which the attacker is expected to die, most frequently by detonation of a bomb, as “martyrdom operations.”

37. When they met in person in February 2023, CHS-2 again asked MEYER if he was sure he wanted to do hijrah, pointing out that news outlets had reported 11 brothers were killed in Iraq and 200 arrested by the government. CHS-2 told MEYER to be 100% sure about travel for hijrah as there is no telling what could happen once he traveled as he could be killed or captured. MEYER stated in substance, “With what’s going on there, I’m not too worried, inshallah, in victory, in marytrdom, if I lose a, even if I come out very injured, but not dead, or imprisoned or tortured.”

38. CHS-2 asked MEYER if he had watched videos before and if he had a problem with watching people dying. MEYER responded, “I’ve seen mainly just the beheadings with a sword and a knife, and there’s the Jordanian guy.”³⁰ MEYER further explained that videos of stabbings made him “kind of squirmish at first but then [he] got used to it.”

39. As an example, CHS-2 began showing MEYER a video on a phone in which a man is seen shooting a 50-caliber gun on the top of a vehicle. After playing approximately two to three seconds of the video, MEYER interrupted and began showing CHS-2 a video on his own device. MEYER explained that the video he was showing CHS-2 was a long video that depicted beheadings, a man getting burned, and gun battles.

40. On or about February 13, 2023, MEYER asked if CHS-1 had any advice for purifying his intentions for hijrah and jihad. MEYER explained that he wanted to join the mujahideen, but he feared the possibility that riyaa³¹ was affecting his actions. MEYER said, “I get a

³⁰ Based on my training and experience and discussions with other investigators, I believe MEYER is referencing a widely-known video in which a Jordanian pilot who had been shot down is depicted being burned to death by ISIS.

³¹ “Riyaa” describes showing off and pretending to do good actions without the real intention.

waswas³² sometimes but I'm not sure on how to distinguish between it and actual desire to do riyaa or something else insincere.”

41. When MEYER met with CHS-2 the third time in June 2023, he again reaffirmed his commitment to joining ISIS, stating, “I don't really have any doubt... I feel quite certain about this.... It's dangerous for the deen³³ too when you're able to go and when you're fit to go to jihad and there's nothing to hold you back... If you say I don't really want to do it, then that's dangerous for your deen.” During that meeting, MEYER explained in more detail what he expected of his contribution as a fighter for ISIS, stating:

I know that sometimes people might have certain skills. Some people might, you know, someone has medical experience, they'll maybe be a doctor, they maybe won't do so much fighting. I think someone like me, I'm younger, I'm more fit. So, you know, and I do want to participate in fighting. And I'm not really sure but, you know, I imagine first training. And I've been told also that they'll be classes for Arabic and learning the deen.... Physical training and then those two classes, and then once that happens, you know. I don't know what the military plans of Dawlah are, but, you know, participating in those. You know, killing, maybe being killed... I'll have to be prepared for that. You mean killing somebody, yeah yeah anything can happen.

42. MEYER further explained how this made him feel, saying:

Feel kind of, you know, nervous in an excited way. You know, like you don't know what's gonna come next... I feel anticipation, that's the word for it. So, you know, it's gonna be a big thing obviously... Colorado, I've grown up here for pretty much... all of my life, you know, except a few years... So I'm going to be leaving behind the emotional attachments is the biggest thing here. And it's a big leap. And, you know I'm also... a bit excited too. Obviously I know it's going to be hard, but at the same time, you know, you're going to be living in the Dar al-Islam³⁴ and you're going to participating in the jihad inshallah. So...

³² “Waswas” describes whispers, usually from the devil, known as “Shaytan,” which can lead to doubt or temptation.

³³ “Deen” is an Arabic word meaning “belief or way of life of a Muslim.”

³⁴ “Dar al-Islam” means house or land of Islam, where Muslims are free to practice their religion, though this often implies the implementation of Islamic law. In this context, it is likely a reference to ISIS-controlled territory.

there's an element of excitement to that... I'm nervous a little bit but... I'm not extremely fearful about it of, you know, all this stress.

43. In that meeting, MEYER confirmed his readiness and how he expected to feel as he executed his travel plans:

I think financially I have everything, yeah. Mentally, yeah I mean obviously it's a hard thing, but... I think yes... I've been waiting for this for a while and obviously when I do it, right when I'm going out, when I go to the airport, when I'm getting on the plane, all that... That is when it is the most difficult. It's going to be like I'm trying to, you know, it's gonna be very, very hard. But... I feel like I'm ready. And I've been waiting for this for a while. And it's not like I'm just gonna get cold feet and back out. 'Cause I've been thinking, I've been waiting.

**MEYER Made Preparations to Travel to Join ISIS and
Took Steps to Obfuscate His Intentions.**

44. Throughout his conversations with CHS-1 and meetings with CHS-2, MEYER discussed his plans for traveling to join ISIS and the various challenges he faced and overcame to facilitate and fund that travel. Over several months, MEYER obtained a passport and collected the clothing and equipment he believed he would need. He researched the logistics and cost of travel, he thought about what would happen to his home and belongings after he left, and he prepared himself for the emotional challenge of leaving his home. Throughout this planning, MEYER discussed his efforts to ensure his actions were consistent with the teachings of Islam and his tactics for obfuscating the intent of his actions.

45. On or about November 6, 2022, MEYER told CHS-1 that he was in the process of applying for a passport in order to travel for hijrah. On or about November 7, 2022, MEYER submitted a Passport Application. When he met with CHS-2 on or about December 9, 2022, MEYER stated that he expected to receive his passport in mid-January. MEYER's passport was issued on December 29, 2022, and delivered via the United States Postal Service to a post office box

associated with a relative of MEYER's in Colorado on December 31, 2022. On or about January 3, 2023, MEYER confirmed to CHS-1 that he had received his passport.

46. After sending his initial bayah video in November 2022, MEYER further discussed possible hijrah destinations and travel logistics with CHS-1. When asked about where he would like to go, MEYER stated, "I'm pretty unsure, I'm stuck between Iraq or Sham.³⁵ Khurasan³⁶ would seem like a good choice due to the hadith of black flags³⁷ but I would prefer an Arabic speaking place as that's the language I wish to learn."

47. By June 2023, MEYER had made plans to travel to Ankara, Turkey, where he believed he would be met by ISIS members who would take him into Iraq. He asked questions of both CHS-1 and CHS-2 about the specific areas within Iraq that he might go to fight, reflecting that he had done research to become knowledgeable about the current efforts of ISIS in the region.

48. MEYER's conversations with both CHS-1 and CHS-2 reflected careful planning and preparation by MEYER. He spoke about how he could apply for a Turkish visa online once he had chosen travel dates, how he planned to take an Uber to the Denver airport since he did not have a car, and how he had learned that there is a place in the Denver airport to pray once he passed through security. In February 2023, MEYER articulated to CHS-2 that he would claim to be a tourist interested in the Ottoman Empire on his Turkish visa application and if he was asked upon arrival.

³⁵ Sham is the area of greater Syria, spanning modern Syria, Lebanon, Israel, Jordan, Palestine, and parts of Turkey.

³⁶ Khurasan is the historical region covering current northeastern Iran, southern Turkmenistan, and northern Afghanistan.

³⁷ "Hadith of black flags" are apocalyptic prophecies revealed by the prophet Muhammad predicting the appearance of an army carrying black banners from Khurasan in support of a messianic figure at the end of time.

MEYER discussed that when the Caliphate was declared and at its peak, “Jihad” was listed as one of the reasons for travel on the Syrian visa application, and MEYER laughed about who would actually give that answer.

49. Throughout his preparations, MEYER showed significant deliberation over whether the actions he was taking were in line with the extremist beliefs of ISIS. In February 2023, CHS-2 asked how MEYER was preparing to fight for ISIS. MEYER discussed various exercises and explained that he had read about mujahid training for Afghanistan and was trying to follow their training.

50. Throughout their conversations, MEYER asked questions of both CHS-1 and CHS-2 about equipment he had been researching and saving to purchase to bring when he traveled to join ISIS—including a jacket, boots, a watch, a phone, and a water bottle. MEYER even asked CHS-1 about packing a miswak³⁸ instead of a toothbrush and toothpaste.

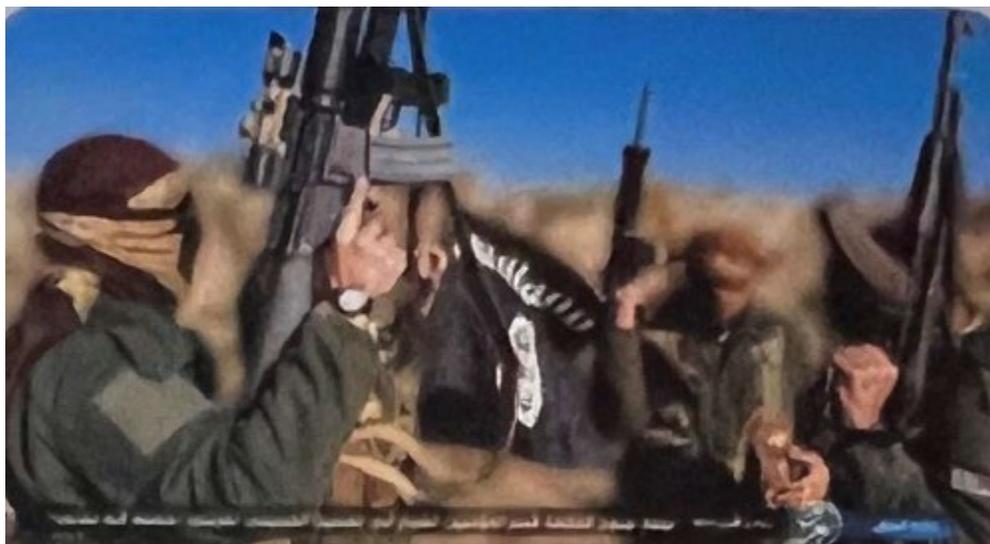
51. While MEYER wanted his purchases to be consistent with religious teachings and the normal practices of ISIS fighters, he was concerned about attracting unwanted attention when he traveled. MEYER discussed whether he should bring a watch, telling CHS-2 that he had seen a lot of mujahid wearing watches when they released the latest bayah pictures. However, MEYER said, “People got put in Guantanamo Bay for wearing Casio watches.” MEYER said he heard of a brand called Alfajr, which will notify you of prayer times.

52. Since he was simultaneously raising funds for these purchases and his travel expenses, MEYER asked for guidance on specific brands of jackets and boots that would meet all the requirements. In March 2023, MEYER contacted CHS-1 to ask if running shoes designed for use

³⁸ A “miswak” is a teeth-cleaning twig made from the salvadora persica tree.

on trails could be used as an alternative to high quality, heavy duty hiking boots because the boots were more expensive and may look suspicious at the airport.

53. On or about December 12, 2022, MEYER messaged CHS-1 and asked, “I was wondering if you have any specific recommendations for the coat and boots I should bring to the Dawlah.” A few days later, MEYER shared the following image with CHS-1, which depicts a black ISIS flag in the background:



After sending the above image, MEYER asked, “Would something like what these brother are wearing be good for the jacket?”

54. On or about January 27, 2023, MEYER shared an image with CHS-1 of Usama Bin Laden and asked if the jacket Usama Bin Laden was wearing would be a good choice for him to wear during hijrah. At one point, MEYER also mentioned to CHS-2 that one of the jackets he thought of taking was used in some Hollywood movies and MEYER didn’t want to risk being kuffar.³⁹

³⁹ “Kuffar” is the Arabic plural form of Kafir, which means a non-believer in Islam.

55. When he met CHS-2 in February 2023, MEYER said, “There’s the M65, which was used by Sheikh Osama here and soldiers in Vietnam.” MEYER then showed CHS-2 the same picture of Usama Bin Laden wearing a jacket that had been previously sent to CHS-1. MEYER discussed another lightweight, waterproof jacket, and said the jacket was \$570 because it’s Gore-Tex, which is durable.

56. In addition to clothing, MEYER was thoughtful about his electronic devices. When he met CHS-2 in February 2023, MEYER said, “Electronic-wise I only plan to bring a phone” and “a solid charger.” The following month, he explained to CHS-1 that he bought a new iPhone as he had dropped his previous phone and broken the screen. In June 2023, MEYER discussed with CHS-2 the importance of bringing his phone when he traveled so he could coordinate meeting the ISIS brothers in Ankara, Turkey. He even showed CHS-2 the flight prices he had been researching using an application on his new iPhone.

57. As for his desktop computer, in February 2023, MEYER discussed with CHS-2 that the computer contained numerous dawah videos, including Anwar al-Awlaki⁴⁰ and Al-Qaida lessons. He explained that he didn’t want his computer searched if it was discovered that he made hijrah. He said he planned to “take the hard drive out of [his] computer, destroy it, wipe any chat logs that [he] can afford to wipe.”

58. When MEYER met with CHS-2 again in June 2023, MEYER discussed that he was “planning on just wiping my desktop and to be extra safe... just taking the hard-drive out...”

⁴⁰ Anwar al-Awlaki was an American Islamist preacher who became a leader in Al Qaeda in the Arabian Peninsula (“AQAP”) and was killed on September 30, 2011.

damaging it to the point it's not usable and throwing it in dumpster after I wipe the computer... Just to make sure 'cause you might forget about something, or... you don't want to leave behind trails."

59. In order to fund his travel and acquire the equipment he needed, MEYER first made efforts to gain employment. MEYER spoke to CHS-1 on several occasions and also with CHS-2 about his challenges in finding a job to finance hijrah that accommodated his religious practice. During these discussions, MEYER spoke of whether employers could accommodate prayer times, would require him to interact with women, or if there would be music playing in the background.

60. On or about February 3, 2023, MEYER updated CHS-2 that he had obtained a part-time job and had begun saving money towards the cost of a flight to Turkey, which was MEYER's planned travel route to get to Iraq. MEYER communicated with CHS-1 regarding his progress on saving money for hijrah. At that time, he believed he was on track to travel during Ramadan,⁴¹ however, the hours he was working and the income from his job were inconsistent. By the end of that month, MEYER reported back again stating, "I've got about 1,1100\$ [sic] earned once all my paychecks come through so far...Should be enough to cover the ticket and visa however a few more expenses need to made I think, such as boots, some cash... and a few smaller things."

61. However, in late-March 2023, MEYER contacted CHS-1 and explained that his work was still slow, which was affecting his fundraising efforts. He planned to look for a different job but again referenced the challenges of finding suitable employment. MEYER reiterated his interest in traveling to join ISIS despite the delayed timeframe, writing, "I can't wait for when I'm finally able to meet you akhi."⁴²

⁴¹ Ramadan for the year 2023 began on March 22, 2023, and ended on April 21, 2023.

⁴² "Akhi" means my brother.

62. Throughout May 2023, MEYER discussed with CHS-1 that he again tried to find employment in order to purchase an airline ticket, which was his primary expense remaining before travel. MEYER informed CHS-1 that he found it difficult to obtain a job, indicating that his job applications were being turned down and noting that some of the opportunities were either “extremely haram or even kufr to participate in.” MEYER mentioned he saw a job that involved helping people load their cars after they shopped; however, MEYER thought the store “might sell idols.” MEYER explained that he had applied for a job at a grocery store, but that the store “sells things like tea for kufr purposes.” MEYER explained there were fast food positions, but he was unsure of the ruling on selling pork to “kuffar.” In discussing these various job applications, MEYER said, “may Allah make it successful and facilitate my hijra soon.”

63. Despite these reported challenges with potential employment, MEYER repeatedly confirmed to CHS-1 his commitment to making hijrah, stating, “Absolutely without a doubt; All these delays are very unexpected.” MEYER also wrote, “I’m very sorry if the amount of time I’ve taken has caused any trouble, I really didn’t expect it to take this long. I really want to make hijrah as soon as possible and I’m sure you want the same for me. My heart longs to leave America and join the mujahideen. So please forgive me if I cause you or any other brother stress.” MEYER later added, “Making hijrah is very important Subhan Allah⁴³ I don't think I've ever wanted anything more than this,” and, “The idea of being unable to do it can make my physically recoil.”

64. On or about May 31, 2023, MEYER contacted CHS-1 to explain a potential opportunity that would provide sufficient funds for MEYER to travel overseas to fight for ISIS. MEYER’s mother had offered to provide him with his own apartment and money for living

⁴³ “Subhan Allah” is an Arabic phrase meaning “Glory be to God.”

expenses, and he believed this would provide him with enough money for his planned travel. MEYER wrote, “It seems like an easy way around a job which would be more time efficient.”

65. On or about June 1, 2023, MEYER wrote, among other things, “I’ve made the decision to get the apartment.” MEYER explained to CHS-1 that after moving into his new apartment, his mother would wire \$3,000 to him, intended to pay for three months of groceries, transportation, and other expenses. MEYER wrote, “The money is a little more than needed for hijrah but I don’t want to spend too much of it on food and whatnot so that I lose proper funds, so once it happens it would be good to make sure everything will be set up soon.”

66. On or about June 9, 2023, MEYER contacted CHS-1 and stated, “I’ve got the rizq.⁴⁴ I’ll be finished moving in a few hours.” MEYER explained the money from his work was mostly gone and that he currently had \$3,122 in his bank account. MEYER explained that his mother had pre-paid for a six-month lease, and he planned to exercise restraint by spending as little as possible of the money she had provided.

67. When MEYER met with CHS-2 in June 2023, he explained that when his mother had offered to get him an apartment, “[He] saw that was an opportunity to get the funds.” He confirmed that she had given him sufficient money that he could instead use for hijrah and further articulated, “I live in the apartment she got me... I wouldn’t have moved into it if it wasn’t for my plans for hijrah. But I needed funds.”

⁴⁴ “Rizq” is a term to describe a blessing from Allah. This can be defined as anything that brings benefits or goodness such as wealth, family ties, spirituality, faith, intellect and health.

68. On multiple occasions, MEYER discussed with CHS-1 and CHS-2 his concerns about his mother: whether she knew of his plans, the emotional challenge of leaving her, and the effect on her if he left without explanation.

69. When he met with CHS-2 in February 2023, MEYER also noted that “stepping away from my family is what I’m worried about.” In preparation to meet with CHS-2 that day, MEYER booked a hotel room alone as practice for when he eventually left because he “worried about emotional attachment, but it shouldn’t be anything too bad.” He had told his mother that he wanted to stay in a hotel to spend some time in town and chose that hotel as it was easy to meet CHS-2 nearby and a low risk location for anyone finding out what he was doing.

70. MEYER told CHS-2 that he was worried about the impact upon his mother when he left. MEYER said he planned to follow the protocol for what is allowed but assumed “no communications because they might be able to track that.” MEYER brought up the idea of writing his mother a note to leave behind, saying, “One day she’s gonna wake up and her son’s not gonna be there and that’s gonna be difficult for her.”

71. MEYER expounded on the desire to give his mother more information during the subsequent meeting with CHS-2 in June 2023. At that time, MEYER stated:

I know obviously I can’t call my mom and be like, ‘Hey I’m going away, I’m going to do, you know.’ ‘Cause that’s very dangerous, and if the police or anybody get a call, I go to the airport, the TSA sees me. Done. But... there is a desire, and I don’t have any plans, but there is a desire to find a way to let her know about something ‘cause the main reason is, you know, not let her know, ‘I made hijrah. I joined Dawlah. I’m in Iraq.’ Nothing like that, but to let her know that ‘I am gone, on my own accord, and I won’t be coming back.’ Because, there’s a certain, you know, I think it would be easier for her to know that than to think, ‘What happened to him? Did he die? Did he get lost? Did he starve? Did he get kidnapped? What happened?’ You know, no idea.

MEYER went on to explain how he could possibly leave such a message behind for his mother, stating:

The main thing I was thinking was possible was, my mother has a spare key to my apartment, and... there would have to be a noticeable, 'cause she doesn't live extremely close. She lives like a few miles away. It's like a forty minute drive, I think. And you know, she knows I do enjoy, you know, my privacy, having alone time. So an amount of time would have to pass for her to become worried enough to come to my house. And she has a spare key. And what I was thinking was write a note. Just, not saying, 'I joined Dawlah.' Not saying, 'I did this.' Saying... something along the lines of, 'I'm not coming back.' Maybe, maybe not saying, 'I'm not in the country anymore.' Just say, 'I left on my own accord. I'm not coming back.' And that's basically the information I'm giving. Period. And just leave a note on the counter and so when she comes in maybe a week, one week, two weeks, she sees that. And I don't know what she'll think about it.

**MEYER Purchased an Airline Ticket to Turkey
to Facilitate His Travel to Join and Fight for ISIS.**

72. On or about June 22, 2023, after meeting with CHS-2 in person earlier that morning, MEYER reached out to CHS-1 to say he was ready to finalize his travel plans for hijrah. Later the same afternoon, MEYER informed CHS-1 that he had completed the e-visa application for Turkey and would book his flight as soon as the visa application was approved. Just after midnight on June 23, 2023, MEYER sent CHS-1 a screenshot that showed an "Electronic Visa, Republic of Turkey." The screenshot included the name, "Davin Daniel Meyer," and when sending this screenshot, MEYER stated, "Info on there is name at birth." The screenshot also included MEYER's date and place of birth as well as his passport number, date of issuance, and date of expiration. This information matches that of the passport issued to MEYER in December 2022 as described above in paragraph 45. The screenshot also showed that MEYER had applied for a Turkish visa for multiple entries between July 15, 2023, and January 10, 2024, with a duration of his stay of 90 days.

73. MEYER then sent CHS-1 a screenshot showing that he had booked a flight on Lufthansa, operated by United Airlines. According to the screenshot, the flight MEYER booked departs Denver International Airport on Friday, July 14, at 8:20 p.m., has a layover in Munich, Germany, and continues on to Ankara, Turkey, where it is scheduled to arrive at 10:10 p.m. on Saturday, July 15.

74. Throughout this conversation with CHS-1, MEYER showed excitement, stating, “I’m jumping in joy akhi الله أكبر;⁴⁵” “I’m very happy Alhamdulillah⁴⁶ الله وبركاته⁴⁷” and “Made me smile thinking about hijrah.” Once he sent the screenshot showing he had booked his flight, MEYER said to CHS-1:

I must say that making hijrah will usually come with trials, you have to give things up Fisabilillah.⁴⁸ I am very happy this is happening, but at the time I feel sad because I will most likely never see my parents again, and I’m leaving the place I’ve grown up all my life and become attached to.... It is a trial but it can be heavy on the heart. As many trials can be, Allah tests those whom he loves. I’m going to see if I can catch any sleep, there’s less than two hours until Fajr⁴⁹ where I’m at.

75. The following day, MEYER messaged CHS-1, stating “Of course I want to go, but it makes me sad having to leave all this behind. This won’t effect my decision insha’Allah, but is there any possibility of being able to have contact with your parents in Dawlah?” He then added, “It’s still hard to separate, but I think I’ve adjusted to the idea a little. I was pretty distressed last night, might be because I didn’t have much sleep.” On or around June 27, 2023, MEYER asked CHS-1, “Akhi

⁴⁵ الله أكبر is Arabic script for “Allah Akbar” which translates to “God is great.”

⁴⁶ “Alhamdulillah” means praise be to Allah

⁴⁷ The Arabic script الله وبركاته although misspelled in Arabic, translates to “Peace, mercy and blessings of God be upon you.”

⁴⁸ “Fisabilillah” is an Arabic expression meaning “in the cause of Allah” or “for the sake of Allah.”

⁴⁹ “Fajr” refers to one of the five mandatory Islamic prayers to be performed at the moment of dawn.

when I go, is there any method you recommend for letting my parents know I'm not like dead or anything? Like a note for them to discover later? I also want to avoid any media coverage by the kuffar, does that tend to be a common thing?"

76. On or about June 28, 2023, I obtained records from United Airlines showing that tickets have been issued in the name of "Davin Daniel Meyer" for travel as a passenger on flights from, and to the following locations, and on the following dates: (1) from Denver International Airport at 8:20 p.m. on July 14, 2023, landing in Munich, Germany, at 2:05 p.m. on July 15, 2023; and (2) from Munich, Germany, at 6:20 p.m. on July 15, 2023, landing in Ankara, Turkey, at 10:10 p.m. on July 15, 2023.

On July 14, 2023, MEYER Was Arrested as He Attempted to Board His Flight.

77. On or about the morning of July 14, 2023, MEYER checked in to the flight he had previously booked, utilizing an online check-in option. Throughout the day, MEYER communicated with CHS-1 and repeatedly expressed anxiety and hesitation. MEYER also repeatedly expressed determination to go through with his plans.

78. At approximately 5:00 p.m., MEYER was observed by law enforcement arriving at Denver International Airport. MEYER exited a Lyft vehicle at the passenger drop-off area of Terminal East. MEYER first went into one of the religious prayer rooms and then stopped at a United check-in counter, where he obtained a paper boarding pass. MEYER proceeded to the TSA security area and was observed passing through TSA security with one piece of carry-on luggage, a black duffel bag.

79. After passing through security, MEYER made his way to the gate associated with his flight. At approximately 7:59 p.m., MEYER showed his boarding pass to the gate agent and entered

the jet bridge. While on the middle of the jet bridge, but before he stepped onto the airplane, MEYER was taken into custody by FBI, on a probable cause arrest.

CONCLUSION

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

Respectfully submitted,

s/ Joni Tangeman
Joni Tangeman, Task Force Officer
FBI

Submitted, attested to, and acknowledged by reliable electronic means this 14th day of July, 2023.



HON. SUSAN PROSE
U.S. MAGISTRATE JUDGE
DISTRICT OF COLORADO

Affidavit reviewed and submitted by Melissa Hindman, Assistant United States Attorney.

DEFENDANT: Davin Daniel Meyer

YOB: 2004

ADDRESS
(CITY/STATE): Castle Rock, CO

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

LOCATION OF OFFENSE: Douglas and Denver Counties, Colorado

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

AGENT: Joni Tangeman
Task Force Officer, Federal Bureau of Investigation

AUTHORIZED BY: Melissa Hindman
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

___ five days or less X 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 X No