



UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 8:07-mj-1520-TEAJ

KARIM MOUSSAOUI

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 19, 2007, in Hillsborough County, in the Middle District of Florida, defendant KARIM MOUSSAOUI, an alien, possessed a firearm, in violation of Title 18, United States Code, Section 922(g)(5)(B). I further state that I am a Special Agent with Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No

Signature of Complainant
William Ortiz, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

November 14, 2007 _____

at

Tampa, Florida _____

ELIZABETH A. JENKINS
United States Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer



AFFIDAVIT

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2 I, William Ortiz, a Special Agent of the Federal Bureau of
3 Investigation ("FBI"), being duly sworn, depose and state as follows:

4 1. I am a Special Agent with the FBI, assigned to the Tampa
5 Division, Tampa, Florida, and have been so employed for ten years. As such, I am
6 an investigative or law enforcement officer of the United States within the meaning
7 of Section 2510 of Title 18, United States Code, in that I am empowered by law to
8 conduct investigations and to make arrests for offenses enumerated in Title 18,
9 United States Code, including offenses under Section 922(g)(5)(B).

10 2. Your affiant has participated in the investigation of weapons
11 violations allegedly committed by KARIM MOUSSAOUI and as a result of his
12 personal participation in this investigation through interviews with and analysis of
13 reports submitted by other agents, your affiant is familiar with all aspects of this
14 investigation. On the basis of this familiarity, and on the basis of the other
15 information which I have reviewed and determine to be reliable, your affiant alleges
16 that there is probable cause to believe that KARIM MOUSSAOUI has committed
17 violations of Title 18, United States Code, Section 922(g)(5)(B) (receiving or
18 possessing any firearm, being a person admitted to the United States under a non-
19 immigrant visa, as defined in section 101(a)(26) of the Immigration and Nationality
20 Act (8 U.S.C. 1101(a)(26))).

21 3. Because this affidavit is submitted for limited purposes, your
22 affiant has not included details of every aspect of this investigation.

23 FACTS AND CIRCUMSTANCES

24 4. On or about August 12, 2007, MOUSSAOUI told New York FBI
25 Agents that on one occasion, he and AHMED LNU (a person now known to the
26 FBI as AHMED ISHTAY) went to a shooting range with YOUSSEF SAMIR
27 MEGAHED. He claimed that MEGAHED went to the range but that MOUSSAOUI
28 and AHMED remained in the store browsing. MOUSSAOUI told New York FBI



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Agents he did not see what type of weapon MEGAHED used on this visit to the range.

5. On August 13 and again on August 30, 2007, MOUSSAOUI gave the FBI consent to search of his laptop computer.

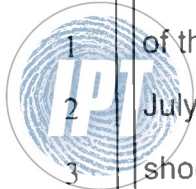
6. On August 30, 2007, FBI Joint Terrorism Task Force ("JTTF") Agents asked MOUSSAOUI if he had ever been to a shooting range with MEGAHED and others. MOUSSAOUI indicated that he, MEGAHED and others went to a shooting range but that he (MOUSSAOUI) did not fire any weapons. According to MOUSSAOUI, he only took pictures at that time.

7. An employee from SHOOT STRAIGHT GUN and ARCHERY RANGE, 3909 North Highway 301, Tampa, Florida, told the FBI that on July 11, 2007, MOUSSAOUI, MEGAHED and AHMED A. SHERIF MOHAMED visited that range. Records there reflect that MEGAHED rented a Glock 17, 9mm. handgun on that date.

8. SHOOT STRAIGHT records also indicated that on July 11, 2007, MEGAHED signed a range membership agreement with SHOOT STRAIGHT GUN and ARCHERY RANGE.

9. Another SHOOT STRAIGHT GUN and ARCHERY RANGE employee advised that on July 19, 2007, MEGAHED rented a Walther G22 rifle and a Smith & Wesson .22 caliber handgun. During his firing of the guns, the Walther became unserviceable and MEGAHED was issued a 9mm. Glock 19 to continue firing. A surveillance video which SHOOT STRAIGHT provided to the FBI shows MOUSSAOUI and others entering that range on that date.

10. During later exploitation of a computer which agents found at the residence of YOUSSEF MEGAHED, FBI JTTF agents found pictures of MOUSSAOUI standing at a firing lane, possessing a shoulder fired weapon and wearing the type of hearing protection shooters use at a shooting range. The photograph depicts him holding a firearm that is consistent in appearance with one



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of the firearms which MEGAHED had rented at the SHOOT STRAIGHT range on July 19, 2007. The surrounding area in the photograph appears to be that of the shooting range at SHOOT STRAIGHT. Moreover, the clothing that MOUSSAOUI is wearing in that photograph is consistent with the clothing which he is wearing in the July 19, 2007 surveillance video from SHOOT STRAIGHT surveillance cameras.

11. On November 1, 2007, Bureau of Alcohol, Tobacco and Firearms ("ATF") Special Agent Kevin Richardson advised your affiant that none of said weapon brands, neither the Walther, the Smith & Wesson nor Glock were manufactured in the State of Florida and that all three firearms described above had thus traveled in interstate commerce prior to being in the state of Florida.

12. On October 31, 2007, Immigration & Customs Enforcement Special Agent Robert Lorenz, assigned to the Tampa FBI JTTF, advised your affiant that KARIM MOUSSAOUI is an alien who is currently in the United States on an F-1 Non-immigrant Student Visa. As such, MOUSSAOUI was admitted to the United States prior to July, 2007 under a non-immigrant visa as that term is defined in Section 101(a)(26) of the Immigration and Nationality Act and that ICE records show that MOUSSAOUI is also not the type of alien present in the United States under the circumstances set forth in 18 U.S.C. § 922(y)(2).

CONCLUSION

13. WHEREFORE, your affiant respectfully submits that there is probable cause to believe that KARIM MOUSSAOUI has committed a violation of federal law, to wit: the possession or receiving of a firearm by a person admitted to the United States under a non-immigrant visa, in violation of Title 18, United States Code, Section 922(g)(5)(B).



Further your affiant sayeth naught.

William Ortiz
Special Agent
Federal Bureau of Investigation

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Sworn to before me
this 14th day of November, 2007.

ELIZABETH A. JENKINS
U.S. Magistrate Judge