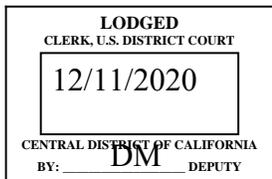


AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original Duplicate Original



UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

MOHAMED NAUFAR,
MOHAMED ANWAR MOHAMED RISKAN,
and
AHAMED MILHAN HAYATHU MOAHMED,

Defendants.

Case No. 2:20-mj-06014

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

Beginning on or about the date(s) of August 1, 2017, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2339B

Conspiring to provide, providing, and attempting to provide material support to foreign terrorist organization

18 U.S.C. §§ 233D, 2(a)

Aiding and abetting the receipt of military-type training from a foreign terrorist organization

This criminal complaint is based on these facts: *(Please see attached affidavit.)*

Continued on the attached sheet.

Complainant's signature

Merrilee R. Goodwin, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 12/11/20

/S/ CHARLES F. EICK
Judge's signature

City and state: Los Angeles, California

Hon. CHARLES F. EICK, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Merrilee R. Goodwin, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since 1998. I am assigned to the Los Angeles Field Office where I conduct investigations of federal criminal violations, including crimes of terrorism and crimes conducted outside the United States. I have participated in many investigations of criminal conduct committed by designated foreign terrorist organizations, such as the Islamic State of Iraq and al-Sham ("ISIS"). From my work on these investigations, I have learned the organizational and operational strategies employed by terrorists, the vernacular that they use, including Arabic terms, and Islamist ideology. I have deployed overseas several times on behalf of the FBI to investigate terrorist attacks and crimes against United States nationals abroad. In that role, I have processed crime scenes, collected evidence, and conducted interviews. I have also worked closely with FBI Special Agent Bomb Technicians ("SABTs") and received training in the construction and use of improvised explosive devices ("IEDs"). Also, during my career as an FBI Special Agent, I have participated in numerous cyber and computer crimes investigations and have received both formal and informal training from the FBI and other institutions regarding the review of digital devices.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of a criminal complaint against, and arrest warrants for, Mohamed Naufar ("NAUFAR"), Mohamed Anwar Mohamed Riskan ("RISKAN"), and Ahamed Milhan Hayathu Moahmed ("MILHAN") for conspiring to provide, providing, and attempting to provide material support to a foreign terrorist organization, namely ISIS, in violation of 18 U.S.C. § 2339B. In addition, this affidavit seeks to charge NAUFAR and MILHAN with aiding and abetting the receipt of military-type training from ISIS in violation of 18 U.S.C. §§ 2339D, 2(a)

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrants and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates, times, and amounts are approximate. All typographical errors appearing in quotes appear as they did in the original.

III. SUMMARY OF PROBABLE CAUSE

4. As detailed below, the FBI is investigating the April 21, 2019 attacks (the "Easter Attacks") in the Sri Lankan cities of Colombo, Negombo, and Batticaloa. On Easter morning,

eight suicide attackers detonated IEDs at three Christian churches and four hotels serving an international clientele. The coordinated, near-simultaneous attacks killed 268 individuals, including five U.S. citizens, and wounded more than 500 people.

5. The attackers and their co-conspirators were members and supporters of ISIS and created a group, "ISIS in Sri Lanka," hereinafter referred to by its name or, more generally, as the "group," that ISIS formally recognized as an ISIS affiliate operating in Sri Lanka. ISIS claimed responsibility for the attacks via its news agency, declaring that "Islamic State fighters" had "targeted citizens of coalition states¹ and Christians in Sri Lanka." ISIS also posted a picture and video of the attackers swearing allegiance ("bayat")² to ISIS's then leader, Abu Bakr al-Baghdadi ("al-Baghdadi").

6. Before detonating an IED that killed himself and scores of victims, Jahran Mohamed Cassim, also known as ("aka") Mohamad Cassim Mohamad Zahran, aka Zahran Hashim ("Zahran"), was the mastermind behind the Easter Attacks and the self-proclaimed leader of ISIS in Sri Lanka. Zahran claimed to have

¹ Based on my training and experience, investigation of this matter, and open-source research, I understand this reference to "coalition states" to be a reference to the American-led military coalition fighting ISIS in Syria.

² Throughout this affidavit, I have defined Arabic words and phrases, Islamic terms, and Tamil words, based on my training and experience, consultation with Arabic and Tamil translators, and my review of online dictionaries. The Arabic word "bayat" means to pledge allegiance, and ISIS and other terrorist organizations use "bayat" to mean the formal swearing of allegiance to the organization and its leadership.

communicated directly with ISIS leadership in Syria and obtained approval to operate as an ISIS affiliate. The group members swore bayat to ISIS and al-Baghdadi and trained and recruited new members using ISIS instruction materials that ISIS provided.

7. Following the attacks, Sri Lankan authorities accepted the United States Government's offer of assistance. Within hours, the FBI deployed personnel to Sri Lanka to assist Sri Lankan authorities and to conduct an investigation. The FBI collected and processed evidence, identified the attackers and their associates, and coordinated medical treatment of injured Americans and the return of the five deceased U.S. citizens.³

8. Sri Lankan authorities arrested ISIS in Sri Lanka associates and members, including the three individuals this complaint seeks to charge. As of the date of this filing, the Sri Lankan government has not filed charges against any perpetrator of the Easter Attacks, including those three individuals.

³ It is expected that any defendant charged with the enumerated offenses and brought into the United States would be "first brought" into the Central District of California where venue to prosecute these offenses would be proper. See 18 U.S.C. § 3238 ("The trial of all offenses begun or committed upon the high seas, or elsewhere out of the jurisdiction of any particular State or district, shall be in the district in which the offender, or any one of two or more joint offenders, is arrested or is first brought; but if such offender or offenders are not so arrested or brought into any district, an indictment or information may be filed in the district of the last known residence of the offender or of any one of two or more joint offenders, or if no such residence is known the indictment or information may be filed in the District of Columbia.").

9. As detailed below, the named defendants and their co-conspirators conspired to provide, provided, and attempted to provide material support, including services and personnel, to ISIS through various actions, including: (1) creating, maintaining, and serving as members of a group of ISIS supporters in Sri Lanka devoted to ISIS, its ideology, and to planning and encouraging violent attacks to advance ISIS's goals; (2) obtaining explosive materials and IED components; (3) manufacturing and testing IEDs, including the types of IEDs ultimately used in attack; (4) recruiting other ISIS in Sri Lanka members; (5) using ISIS-created training materials to instruct and train the attackers and their co-conspirators in the use of firearms and explosives; (6) procuring safe houses for the group to prepare for attacks in the name of ISIS, including the Easter Attacks, while avoiding law enforcement detection; (7) following ISIS directives to use specific end-to-end encrypted messaging applications to conceal the criminal conspiracy; (8) murdering two Sri Lankan police officers to obtain the officers' firearms; and (9) shooting a suspected police informant.

IV. STATEMENT OF PROBABLE CAUSE

A. Legal Background

10. At all relevant times, Section 2339B of Title 18 provided, in pertinent part:

Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, shall be fined under this title, imprisoned not more than 20 years, or both, and if the death of any person results, shall be imprisoned for any term of years or for life. To

violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization . . . that the organization has engaged or engages in terrorist activity . . . , or that the organization has engaged or engages in terrorism

11. Subsection 2339A(b)(1) defined "material support or resources," for purposes of Section 2339B, as:

[T]he term "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, safe houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.

12. Section 2339D of Title 18 provided, in pertinent part:

Whoever knowingly receives military-type training from or on behalf of any organization designated at the time of the training by the Secretary of State under section 219(a)(1) of the Immigration and Nationality Act as a foreign terrorist organization shall be fined under this title or imprisoned for ten years, or both. To violate this subsection, a person must have knowledge that the organization is a designated terrorist organization (as defined in subsection (c)(4)), that the organization has engaged or engages in terrorist activity (as defined in section 212 of the Immigration and Nationality Act), or that the organization has engaged or engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

13. Subsection 2339D(c)(1) defined "military-type training" to include the "training in means or methods that can cause death or serious bodily injury, destroy or damage property, or disrupt services to critical infrastructure, or training on the use, storage, production, or assembly of any explosive, firearm or other weapon, including any weapon of mass destruction"

B. ISIS is a Designated Foreign Terrorist Organization

14. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act (the "INA") and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

15. On 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 ISIL 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 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

C. The Easter Attacks

16. The following information is based upon my investigation, my discussions with other U.S. and Sri Lankan law enforcement personnel, and my review of investigative reports, physical evidence, witness interviews, Closed-Circuit Television ("CCTV") recordings from the blast sites, and open-source materials:

a. At approximately 8:45 a.m. on April 21, 2019, a suicide attacker, later identified as Ahamed Muaath Alawudeen ("Muaath"), detonated an IED inside St. Anthony's Shrine ("St. Anthony's") in Colombo, Sri Lanka's capital city, which is on the country's west coast.

b. At approximately 8:47 a.m., a suicide attacker, later identified as Mohamed Azaam Mohamed Mubarak ("Mubarak"), detonated an IED inside the Kingsbury Hotel (the "Kingsbury") in Colombo. The photographs below show Mubarak carrying the IED inside a backpack moments before the attack, as well as the blast's immediate aftermath.



c. At approximately 8:47 a.m., a suicide attacker, later identified as Achchi Muhammad Hasthun ("Hasthun"), detonated an IED inside St. Sebastian's Catholic Church ("St. Sebastian's") in Negombo, a city near Colombo. The photograph below depicts Hasthun carrying an IED inside a backpack moments before entering St. Sebastian's.



d. At approximately 8:50 a.m., a suicide attacker, later identified as Mohammad Ibrahim Inshaf Ahamed ("Inshaf"), detonated an IED inside the Cinnamon Grand Hotel (the "Cinnamon Grand") in Colombo. The photographs below show Inshaf carrying the IED inside a backpack moments before the attack, as well as the blast's aftermath.



e. At approximately 8:51 a.m., an individual later identified as Abdul Lateef Jameel Mohammed ("Lateef") attempted to detonate an IED inside the Taj Samudra Hotel (the "Taj") in Colombo. He left the Taj after failing to trigger the IED. The photograph below shows Lateef attempting to detonate the IED in his backpack by triggering the detonation switch.



f. At approximately 8:54 a.m., two suicide attackers, later identified as the group's leader, Zahran, and Ilham Mohamed Mohamed Ibrahim ("Ilham"), detonated IEDs inside the Shangri-La Hotel (the "Shangri-La") in Colombo. The photographs below depict Zahran and Ilham moments before the

detonation, carrying the IEDs in backpacks, as well the damage caused to the building's exterior.



g. At approximately 9:05 a.m., a suicide attacker, later identified as Mohamad Nazar Mohamed Aazath ("Aazath"), detonated an IED inside Zion Roman Catholic Church ("Zion") in Batticaloa, which is on Sri Lanka's east coast.

h. At approximately 1:20 p.m., a suicide attacker, later identified as Lateef (who failed to detonate his IED earlier that day at the Taj) successfully detonated an IED inside the New Tropical Inn in Dehiwala-Mount Lavinia, a Colombo suburb.

i. The Taj, Shangri-La, Kingsbury, and Cinnamon Grand were all luxury hotels frequented by foreign travelers, including from the U.S.

j. Five U.S. citizens were killed. As a result of the explosion at the Cinnamon Grand, three U.S. citizens died: K.D., D.K., and C.D.⁴ At the time of the attack, C.D. was

⁴ Throughout this affidavit, initials are used to protect the identities of witnesses and victims.

employed by the U.S. Department of Commerce and was in Colombo working in her official capacity. Two U.S. citizens died at the Shangri-La: A.L. and D.L.

k. Later that day, at approximately 2:25 p.m., Fatima Mohamed Jifry ("Jifry"), the wife of Ilham (one of the Shangri-La suicide bombers), detonated an explosive device at a housing complex in the Colombo suburb of Dematagoda after the Sri Lankan Special Task Force ("STF") arrived at the premises. The blast killed Jifry, three STF officers, and Jifry's three sons. Jifry was pregnant when she took her own life.

l. Five days later, on April 26, 2019, at approximately 7:30 p.m., Sri Lankan security forces raided a house in Sainthamaruthu, a town located on Sri Lanka's east coast. At the Sainthamaruthu safe house,⁵ ISIS in Sri Lanka members engaged in a shootout with the security forces and eventually detonated at least one IED, killing six men, three women, and six children. No security forces were killed. Among those killed in the encounter were Zahran's father, Mohamed Hashim, and his brothers, Zainee and Rilwan Cassim.

⁵ As detailed below, following the Easter Attacks, the Sri Lankan authorities identified several residences and properties ISIS in Sri Lanka members leased in the months leading up to the attacks. Throughout this affidavit, I describe these residences as "safe houses" and identify each safe house by the neighborhood or city in which the property was located. ISIS in Sri Lanka members used the safe houses to meet, train, manufacture and test IEDs used in the Easter Attacks and to avoid law enforcement detection.

D. ISIS Claims Responsibility for the Easter Attacks and April 26, 2019 Shootout

17. Based on my investigation, my discussions with U.S. and Sri Lankan law enforcement officials, and open-source research, I know the following:

a. On April 23, 2019, ISIS claimed responsibility for the Easter Attacks via its news outlet, the Amaq Agency ("Amaq"). ISIS claimed that the attacks were conducted by "Islamic State fighters" who had "targeted citizens of coalition states and Christians in Sri Lanka."

b. Also on April 23, 2019, Amaq posted the below picture and a video of the attackers swearing allegiance to ISIS leader al-Baghdadi. Zahran, the attacks' mastermind, is visible unmasked in the center of the group standing in front of the ISIS flag. Four of the attackers are brandishing knives.



c. On April 27, 2019, the day after the shootout in Sainthamaruthu, Amaq released a statement claiming that "17 members of the Sri Lankan Police were killed and wounded in an ambush prepared by Islamic State fighters."⁶

⁶ Amaq's reporting contradicted official reports that no police officers died during that shootout.

d. On April 29, 2019, Amaq released a video of al-Baghdadi in which he described the April 21, 2019 attacks as retaliation against "the West" for ISIS's March 2019 defeat in Baghuz, Syria.⁷ Specifically, al-Baghdadi praised the "commando operations that unsettled the Crusaders in their Easter celebration to avenge their brothers in Baghuz," and praised God that "among those killed were some Americans and Europeans."

E. The Attackers Manufacture and Deploy Nitrate-Based IEDs

1. The Blast Sites and Safe Houses

18. Based on my discussions with an FBI SABT who deployed to Sri Lanka and reviewed and collected physical evidence from attack sites (also referred to as blast sites) and safe houses, and my review of witness interviews, CCTV recordings, and forensic reports, I know the following:

a. An IED generally consists of three components: (1) an explosive; (2) a fusing system; and (3) a container. Explosives are reactive substances that can release large amounts of energy at varying speeds. IEDs manufactured with high explosives, meaning the explosives release energy at supersonic speeds, may contain multiple explosive materials within a single device referred to as primary, secondary, and in some cases, tertiary explosives. Primary explosives, which are

⁷ According to open-source information, the Battle of Baghuz Fawqani, which lasted from February 9, 2019 to March 23, 2019, marked the end of ISIS's territorial occupation of Syrian lands and ISIS's self-proclaimed "caliphate."

extremely sensitive to stimuli, are generally used in small quantities to initiate (set off) secondary explosives, which are often relatively stable and therefore can be more safely handled. Tertiary explosives, which are often added in bulk quantities, require a secondary explosive to initiate the tertiary material. A fusing system is a means or mechanism for initiating the explosive materials. A fusing system can be chemical, mechanical, or electrical in nature. Generally, an electrical fusing system consists of a power source (commonly a battery), a conductor (commonly electrical wires), an initiator (also called a detonator and often containing a primary explosive material), and a switch. A switch activates the power source allowing energy to flow through the conductor to the initiator, which sets off the primary explosive material that starts the explosive chain reaction in the device. A container holds the explosive(s) and/or fusing systems. IEDs are often further concealed in a second receptacle, such as a backpack or vest. Terrorists who build IEDs often add shrapnel to increase the lethality of those devices. Ball bearings, screws, and other metal parts are common types of shrapnel added to IEDs.

b. The IEDs used in the Easter Attacks consisted of nitrate-based explosive materials, an electrical fusing system, and a metal container concealed within a cloth backpack.

c. The IEDs' fusing systems consisted of nine-volt batteries, commercially available blasting caps, Christmas lights, wires, electrical tape, and switches. The attackers initiated the devices using two switches – a rocker or “on-off

switch" to arm the device, and a push button switch to initiate the primary explosive material contained within the blasting cap. The Sri Lankan authorities recovered multiple fusing systems at the Sainthamaruthu safe house. The FBI analyzed one of the recovered fusing systems and it contained a rocker switch and push button as a means of initiation.

d. The FBI also recovered nine-volt batteries and distinct green and white electrical wires from the Panadura and Dematagoda safe houses that were consistent with the wire remnants found at the Cinnamon Grand, St. Anthony's, and the Kingsbury blast sites. Similarly, the FBI and Sri Lankan authorities recovered rolls of black electrical tape at the Panadura and Sainthamaruthu safe houses that were consistent with electrical tape fragments recovered from the Shangri-La and Cinnamon Grand blast sites. The FBI also recovered a Christmas light from the Panadura safe house.

e. The below photograph shows partially constructed fusing systems that Sri Lankan authorities recovered from the Sainthamaruthu safe house. To complete the fusing system, the attackers added nine-volt batteries, Christmas lights, and switches to the detonators shown below.



f. When activated, the primary explosive contained within the initiator (blasting cap) triggered a secondary explosive material, "water gel" – a chemical mixture of ammonium nitrate and aluminum. This gooey, gelatin-like substance was commercially available in Sri Lanka. The Sri Lankan authorities recovered water gel explosives at the Sainthamaruthu safe house and witnesses confirmed that the group purchased and used water gel to construct the IEDs. Witness statements and evidence – specifically nitric acid, potassium nitrate, and three large barrels of white powder – recovered by the Sri Lankan authorities from a rural estate ("the Puttalam Estate" or "Puttalam safe house") owned by one of ISIS in Sri Lanka's members suggest that the attackers used a third explosive compound, urea nitrate, to increase the explosive force of their devices. Urea nitrate is a powder-like substance made by

combining urea (a commercially available fertilizer) with nitric acid and can be produced cheaply and in bulk quantities.

g. The attackers added ball bearings to some or all of the IEDs to increase their lethality. The below photographs depict ball bearings found at the Cinnamon Grand blast site and at the Batticaloa IED test site.



h. The IEDs were contained and concealed within backpacks. CCTV footage from the blast sites shows the attackers carrying the IEDs in gray and blue and/or gray and black cloth backpacks. The Sri Lankan authorities recovered an unused gray and black cloth backpack at the Dematagoda safe house that resembled the backpacks the attackers carried in the CCTV footage. The Sri Lankan authorities also recovered what appeared to be backpack fragments from the Shangri-La, Cinnamon Grand, St. Anthony's, and the Kingsbury blast sites. The below photograph depicts backpack remnants found at the Cinnamon Grand blast site. The charring and tearing are consistent with the effect of an explosive on the material.



2. Forensic Examination Confirms the Presence of Nitrite Ions at the Blast Sites and Safe Houses

19. The FBI's Terrorist Explosive Device Analytical Center ("TEDAC") analyzed evidence the FBI recovered from the blast sites and safe houses. According to TEDAC's analysis, chemicals and chemical precursors detected on items the FBI recovered from the blast sites and safe houses are consistent with a nitrate-based IED.

20. TEDAC identified the following chemicals and chemical precursors from items seized from the blast sites and safe houses: nitrate, nitrite, ammonium, sulfate, chloride, potassium, and calcium. Most significantly, TEDAC detected nitrite ions at several blast sites and safe houses. Because nitrite ions do not naturally occur in the environment, the presence of nitrite ions is consistent with the denotation of a nitrate-based explosives. Detonations of IEDs containing either

(or both) water gel or urea nitrate will result in the dispersal of nitrite ions.

3. Witness Interviews Confirm that the Attackers Used Nitrate-Based Explosives

21. Custodial interviews of witnesses and ISIS in Sri Lanka members confirmed that the attackers manufactured and used nitrate-based IEDs consistent with the items the FBI recovered from the blast sites and safe houses.

22. On July 18, 2019 and March 15, 2020, at the Sri Lankan Criminal Investigations Department ("CID") headquarters, FBI special agents conducted a recorded interview of M.M.M.H., who was a member the ISIS-approved group Zahran led and supplied detonators to Zahran before the Easter Attacks.⁸ M.M.M.H. made the following statements, among others:

a. At Zahran's invitation, M.M.M.H. attended training programs where he learned from Zahran about Islam and

⁸ At the outset of each interview, FBI special agents advised all persons detained in Sri Lankan custody of the following rights: the right to remain silent; the right to talk to a lawyer before answering questions; the right to have a lawyer present during the questioning; the right to a court-appointed lawyer if the interviewee could not otherwise afford a lawyer; and the right to stop answering questions at any time. FBI special agents also informed the detainees that anything they said could be used against them in court. A translator was present throughout the interviews and the rights and waiver form were translated into the detainee's primary language. Each of the interviewees discussed in this affidavit acknowledged that they understood their rights and were willing to waive their rights. Each detainee signed a waiver of rights form.

Sharia. M.M.M.H. approved of Zahran's ideology, including his support for ISIS and the Mujahedeen.⁹

b. Between December 2018 and April 6, 2019, M.M.M.H. procured approximately 1,900 detonators and 1,300 water gel explosives, which he sold to Zahran in six transactions. M.M.M.H. claimed Zahran told him that he (Zahran) intended to use the detonators to fish.

c. M.M.M.H. communicated with Zahran using Threema and Telegram on phones Zahran provided him and other ISIS in Sri Lanka members.¹⁰ Via text and voice messages, Zahran instructed M.M.M.H. to purchase specific materials including detonators and water gel explosives. According to M.M.M.H., because his communications with Zahran focused on "illegal" things, M.M.M.H. deleted his communications with Zahran before his arrest by Sri Lankan authorities.

F. Mohamed NAUFAR

23. As detailed below, NAUFAR is an ISIS member and supporter and served as ISIS in Sri Lanka's "second emir"¹¹ -

⁹ "Mujahedeen" is the plural form of "mujahid," the Arabic term for one engaged in jihad, which literally means "struggle," but is often used by Islamist terrorists and their supporters to refer to violence perpetrated against non-believers.

¹⁰ Based on my training and experience, I know that Threema, Telegram, and WhatsApp are end-to-end encrypted messaging applications, meaning that the content of the messages is only accessible via the users' digital devices and is not stored on the applications' servers. Security-conscious users prefer these types of messaging applications because of the perceived security and anonymity end-to-end encryption offers users.

¹¹ The Arabic word, "emir" means ruler or commander and is often used in terrorists to indicate those in leadership positions.

directly under Zahran's leadership. Zahran tasked NAUFAR with leading the group's propaganda and media efforts. In addition, NAUFAR recruited on behalf of ISIS and organized and led weapons, explosives, and ideology trainings.

1. NAUFAR's Admissions to the FBI

24. On June 10, 11, and 26, 2019, and March 11, 2020, FBI special agents conducted recorded interviews of NAUFAR at CID headquarters in Colombo. NAUFAR made the following statements, among others:

a. *NAUFAR Embraces ISIS Ideology and Aligns Himself with Zahran*

a. In approximately 2009, while NAUFAR was living in Qatar, Zahran started a new organization, the National Thowheeth Jama'ath ("NTJ").¹² Zahran used the new organization to preach an extremist version of Islam.

b. In late 2015 or early 2016, NAUFAR began researching ISIS. NAUFAR initially disapproved of ISIS's endorsement of violence against other Muslims and ISIS's advocacy to destroy Saudi Arabia, where many Islamic holy sites were located.

c. In early 2017, Zahran gave a speech in Kattankudy, a town on Sri Lanka's east coast, which was recorded and posted online. In that speech, Zahran defended ISIS as a legitimate organization.

d. According to NAUFAR, two events in 2017 solidified Zahran's support for ISIS. After a public gathering

¹² Thowheeth Jama'ath means a "monotheistic organization" in Arabic.

Zahran organized devolved into a violent conflict between Sufi Muslims¹³ and Zahran's followers, Sri Lankan authorities arrested Zahran's followers but not (according to NAUFAR) the Sufi Muslims. That same year, NAUFAR claimed that the Sri Lankan government failed to prevent Buddhist extremists from attacking Muslims, causing NAUFAR and others to believe that the Sri Lankan government was biased against Muslims.

e. In and after August 2017, Zahran showed NAUFAR ISIS videos, documents, and other information that led NAUFAR to embrace ISIS. NAUFAR formed an allegiance with Zahran and claimed to have joined ISIS at this time with the intention of committing suicide attacks.

b. ISIS Leaders Approve Zahran's Group as Part of ISIS and NAUFAR is Named Second-in-Command and Leads Firearms and Explosives Trainings

f. In approximately 2014, A.N. - a close associate of Zahran - traveled from Sri Lanka to Syria with his family members and lived in ISIS-controlled areas. One of A.N.'s family members, A.D., became an ISIS leader.

g. In late 2017 or early 2018, Zahran recorded a video of himself, NAUFAR, MILHAN, Hasthun (the St. Sebastian's suicide bomber), Rilwan (Zahran's brother who died in the April 26, 2019 shootout), and others. The group gathered in a Sri Lankan forest and, while holding firearms, pledged allegiance to ISIS and al-Baghdadi. Zahran, possibly with

¹³ Sufism is a mystical form of Islam that is often at odds with extreme and violent interpretations of Islam, such as those espoused by ISIS.

Lateef's assistance, sent the video to A.N. and A.D. in Syria. NAUFAR understood that A.N. and A.D. promised Zahran that the video would be delivered to al-Baghdadi.

h. According to Zahran, because of the video, ISIS officially approved Zahran's group as part of ISIS, with Zahran as the group's leader or emir. Zahran appointed NAUFAR to be his "second-in-command" and the group's media and propaganda officer.

i. Following ISIS's official recognition of the group, now known as ISIS in Sri Lanka, Zahran told NAUFAR and others that ISIS leaders in Syria communicated directly with him using Telegram. Zahran said ISIS provided him ISIS materials, including a detailed training syllabus for the group's members.

j. At ISIS and Zahran's direction, NAUFAR organized approximately eight training courses for current and prospective members based on the materials ISIS provided. These multi-day courses were held in rented homes and were attended by between 15 and 25 students. The courses included instruction on ISIS ideology and firearms and explosives training. Participants learned to operate a Type-56 rifle¹⁴ and 9-millimeter pistol and to make black powder explosives. NAUFAR, MILHAN, and Zahran were among the instructors. Hasthun served as an explosives expert, while Ilham (one of the Shangri-La suicide bombers) financed the group's activities. During the courses, the group discussed targeting American interests overseas and attacking

¹⁴ Based on my training and experience, I know that the Type-56 rifle is a Chinese variant of the Soviet-designed AK-47 rifle and comes in both semi-automatic and automatic varieties.

Americans when they traveled outside the United States. At the end of each course, the attendees swore allegiance to ISIS. Attendees were instructed not to bring their phones to the training courses, not to use their real names, and not to disclose personal information to the group.

k. In December 2018, ISIS in Sri Lanka members vandalized Buddhist statues in Mawanella, a town in central Sri Lanka. NAUFAR claimed that he went into hiding in January 2019, shortly after the desecration of those statues.

l. Zahran distributed mobile phones to ISIS in Sri Lanka members, and between 2017 and his arrest, NAUFAR used approximately five phones Zahran provided. To further the group's security, Hasthun swapped out the phones' SIM cards every three to four months and directed the group to use the encrypted messaging applications Telegram and Threema. NAUFAR was told not to make telephone calls using the phones.

c. NAUFAR Claims to Have Broken Ties with Zahran a Month before the Easter Attacks Though He Admits to Being Warned the Morning of the Attacks to Flee

m. In early 2019, NAUFAR believed Zahran was to blame for the Sri Lankan authorities' raid on the Puttalam estate, because Zahran had disregarded the group's security protocols and used his mobile phone and the landline at the Puttalam estate to make and receive calls.

n. On March 7, 2019 – a little over a month before the Easter Attacks – NAUFAR and others confronted Zahran, who agreed to resign as leader of the group. The following day,

however, Zahran rescinded his resignation and claimed that ISIS officials in Syria should be consulted before any leadership change. A rift developed between Zahran and NAUFAR.¹⁵ NAUFAR claimed that he last had direct contact with Zahran on March 9, 2019. NAUFAR stated that he attempted to reconcile with Zahran, but Zahran rejected NAUFAR's overtures.

o. In the days leading up to the attack, NAUFAR and his supporters hid at a safe house in Wattala, a large suburb of Colombo. On April 20, 2019, RISKAN, who had been living with Zahran at the time, traveled to the Wattala safe house to speak with NAUFAR and his supporters. NAUFAR refused to speak with RISKAN, preferring to deal directly with Zahran, and did not allow RISKAN to enter the home. According to NAUFAR, RISKAN told another ISIS in Sri Lanka member who was staying with NAUFAR – M.S.M.A. – that Mubarak (the Kingsbury suicide bomber) had been arrested and that NAUFAR should flee.¹⁶ Not having anywhere else to go, however, NAUFAR remained at the safe house.

p. At approximately 8:30 a.m. on April 21, 2019, RISKAN returned to the Wattala safe house and informed NAUFAR that Zahran had executed a series of attacks. After seeing

¹⁵ The evidence detailed in this complaint shows that, despite some ISIS in Sri Lanka members' claims that a division among members arose days before the attack (to the extent this is accurate and not an attempt at minimize their conduct), the defendants and their co-conspirators remained committed to ISIS ideology and to conducting attacks on ISIS' behalf, even if they disagreed about the leadership of their group.

¹⁶ I am not aware of any evidence that Mubarak was, in fact, detained by Sri Lankan authorities before he participated in the Easter Attacks.

reports of the Easter Attacks on Facebook, NAUFAR and others fled the safe house.

d. NAUFAR's Theories on Zahran's Selection of Targets for the Easter Attacks

q. NAUFAR claimed not to have had advance knowledge of the Easter Attacks or to have assisted in the manufacturing of the IEDs used in the attacks, though he admitted to having overheard a discussion between Hasthun and Rilwan regarding bomb-making in January 2019. NAUFAR further claimed that if he had known of Zahran's plans, he would have tried to stop Zahran. NAUFAR described the attacks as a strategic mistake. He thought the group should have focused on one-off "lone wolf" or "guerrilla" attacks rather than the large-scale coordinated attacks Zahran directed. NAUFAR surmised that the group could have reconstituted itself after small-scale attacks, allowing the group to continue its jihad.

r. Following his arrest and while in CID custody, NAUFAR reported that another detainee and ISIS in Sri Lanka member, M.M.M.H., told NAUFAR that M.M.M.H. procured approximately 2,000 detonators for Zahran in the year leading up to the Easter Attacks. When M.M.M.H. told NAUFAR about the detonators, M.M.M.H. joked that he had purchased enough detonators to mine Mount Everest. NAUFAR claimed that, before this discussion with M.M.M.H., NAUFAR had known that M.M.M.H. was a member of ISIS but not that M.M.M.H. was involved in the procurement of IED materials.

s. NAUFAR volunteered the following rationales for the Easter Attacks: First, Zahran targeted churches in retaliation for an alleged March 2019 American-led attack on ISIS fighters in Syria that purportedly killed 3,000 people with white phosphorous munitions.¹⁷ NAUFAR noted that just prior to the Easter Attacks, ISIS, in an unspecified weekly publication, directed followers to target Christian churches.¹⁸ Second, Zahran was in close contact with ISIS leadership before the attacks and ISIS had instructed its followers to attack China and Chinese interests. Zahran selected the Shangri-La hotel because the hotel's headquarters was in China.¹⁹ Third, Zahran targeted the hotels because foreigners were known to frequent them. Fourth, Zahran opted to "serve" ISIS as a suicide bomber rather than be arrested by the Sri Lankan authorities, who were searching for Zahran for his involvement in the Puttalam training camp and the desecration of statues of the Buddha in December 2018. Fifth, and finally, NAUFAR surmised that the

¹⁷ In March 2019, media outlets reported that U.S.-backed forces launched airstrikes on ISIS fighters in Baghuz, Syria and used white phosphorous munitions.

¹⁸ According to open-source reports, on March 16, 2019, the pro-ISIS Muntasir media outlet released a video on Telegram in response to the March 15, 2019 Christchurch, New Zealand terrorist attack, in which the male voiceover directs Muslims to conduct "operations against the unbelievers . . . within their polytheistic churches . . . or other places packed with cross worshippers."

¹⁹ According to the Shangri-La's website, the hotel chain's headquarters were located in Hong Kong, Special Autonomous Region, a political subdivision of the People's Republic of China.

purpose of the attacks was to alert the world to ISIS's hatred of the United States.

e. After His Arrest, NAUFAR Identifies His Cell Phone

25. During the March 11, 2020 interview, an FBI special agent showed NAUFAR a cell phone that CID had identified as belonging to NAUFAR. NAUFAR confirmed that the cell phone belonged to him and that he had it on his person the night of his arrest. Before his arrest, NAUFAR attempted to destroy the phone, but was unable to do so. Instead, NAUFAR attempted to delete the phone's content by restoring the phone's "factory settings" believing this would wipe the contents of the phone.

2. Witnesses Describe NAUFAR as ISIS in Sri Lanka's Second-in-Command and Identify NAUFAR as One of the Group's Training Program Directors and Lecturers

26. Based on my review of FBI reports, I know that nine individuals detained in CID custody whom the FBI interviewed identified NAUFAR as a leader of ISIS in Sri Lanka and several witnesses identified NAUFAR as one of the leaders of the ISIS training programs. In addition, 13 individuals confirmed that approximately one month before the Easter Attacks, a rift developed within the group over its leadership. None of the other individuals the FBI interviewed provided information that contradicted NAUFAR's leadership of the group.

3. NAUFAR'S Voluminous Writing on Islamic Topics and Pre-2016 Rejection of ISIS

27. During his interviews, NAUFAR identified his blogging website to FBI special agents. From my review of reports of

investigation and archived pages from that website preserved by the Internet Archive,²⁰ I learned the following:

a. An archival capture of the website made on January 28, 2019 shows the following: the "About Me" section includes a photograph of a person that I recognize as NAUFAR from photographs taken of him during his FBI interviews; the "Posts" section identifies 148 posts, tagged in 20 categories, nearly all of which concerned religious topics; and the latest post indicated was dated June 23, 2018.

b. An archival capture of the website made on October 19, 2014 - which is the earliest date the website was archived by the Internet Archive - shows that NAUFAR started posting on his blog no later than October 9, 2014.

c. An October 18, 2014 Tamil-language post, entitled "ISIS: A Criticism (3)," summarized commentary contained in two books, one released by ISIS and another released by an ISIS opponent. An October 23, 2014 Tamil-language post, entitled "ISIS: A Criticism (4)," continued this summary. The topics addressed in these two posts included ISIS's treatment of prisoners, a purported alliance among American and Iraqi governments and Shi'a Muslims, and ISIS's condemnation of Muslims who participated in Iraq's democratic elections as "non-believers" who violated Islamic law.

²⁰ The Internet Archive is a digital library that provides public access to archives of Internet websites, which the library makes accessible through an online portal called the "Wayback Machine."

4. The Group Obtains ISIS Training Syllabi and Materials

28. Based on my participation in this investigation, review of FBI and Sri Lankan investigative reports, conversations with Sri Lankan law enforcement officials, and my review of a forensic copy of a seized hard drive that belonged to Ilham (one of the Shangri-La suicide bombers), I know the following:

a. Before his participation in the Easter Attacks, Ilham gave his brother, M.I.I.H., a hard drive that Ilham described as containing important Islamic messages. At M.I.I.H.'s direction, M.I.I.H.'s employee retrieved that hard drive from M.I.I.H.'s car, and CID seized the hard drive from that employee on April 22, 2019.

b. The FBI created a forensic copy of that hard drive and reviewed its content.

c. Information on the hard drive confirmed that the device belonged to Ilham. For example, metadata from Microsoft Word documents found on the hard drive shows that "Ilham" authored several documents, including one entitled "Niqab Importance,"²¹ and that "Ilham" was the last user to access at least 25 Microsoft Word documents saved on the hard drive.²²

²¹ "Niqaḅ" is an Arabic word referring to a garment of clothing that covers the face, which is worn by some Muslim women as a part of their interpretation of "hijab," or modest dress.

²² Based on my training and experience, I know that Microsoft Word automatically records information for each word document, including the document's author, creation date, the

d. The hard drive contained approximately one terabyte of data, the vast majority of which was ISIS publications, media, and propaganda. Much of that data was arranged into topic folders that corresponded with the topics ISIS in Sri Lanka members described learning during the multi-day training courses Zahran and NAUFAR organized. These folders contained ISIS-created training syllabi, video and audio clips, pamphlets, and copies of ISIS's official magazine, "Dabiq." Topics included "Jihad for the Sake of Allah," "Taqfir,"²³ and "Terrorism."

e. As one example, the hard drive contained a compendium of articles entitled "The Book of Jihad," which provided guidance to ISIS fighters (mujahedeen). One article recommended that fighters study "various weapons," including "rifle with fixed bayonet" and "mastering the use of automatic weapons especially the AK-47 and it's like." Elsewhere in the same pamphlet, an author identified certain skills as "basic" to "the technical preparation of the urban mujahid," including knowing "how to handle weapons, including AK-47, assault rifles,

last user to access the document, and the date of last access/change. When a document is created by a user, the username present on the user's Microsoft Word profile is automatically added as the author name.

²³ In Arabic, the word "taqfir" means "to call someone an apostate." Islamic extremists, such as ISIS, often use "taqfir" to describe the act of officially designating a Muslim to be a "kafir," i.e., a "nonbeliever" or "infidel," meaning the person is no longer a true Muslim. The designation carries with it a death sentence, according to some interpretations of Islam.

submachine gun, revolver, automatic pistol, FAL,²⁴ various types of shotguns, carbines, mortars, bazookas, etc." The author also urged fighters to study "how to improvise and repair weapons, prepare Molotov cocktails, grenades, mines, homemade destructive devices, how to blow up bridges, [and] tear up and put out of service railroads and railroad cars." The author concluded that "[t]he use of explosives against populated areas in nations that are at war with Muslims is allowed." Another article, purportedly written by Anwar al-Awlaki,²⁵ stated: "In the case of the United States both the government and private citizens should be targeted. . . . Anyone who inflicts harm on them in any form is doing a favor to the ummah."²⁶

f. Another pamphlet found on the hard drive, entitled "The Security and Intelligence Course," provided specific instructions concerning the handling of explosives, such as, "never pack the detonators with the main charge of explosives."

g. The hard drive also contained a copy of "Rumiyah," an ISIS online magazine. One article in the magazine

²⁴ Based on my training and experience, I know that the FAL is a battle rifle designed in Belgium and manufactured by FN Herstal.

²⁵ Based on my training and experience, I know that Anwar Nasser al-Awlaki was a Yemeni-born, American citizen and popular Muslim preacher who returned to Yemen and became a leader within the foreign terrorist organization al-Qa'ida in the Arabian Peninsula before he was killed in a drone strike in 2011. Recordings of Al-Awlaki's audio lectures have been widely distributed online and encouraged supporters to wage violent jihad against the United States and its allies.

²⁶ "Ummah" is an Arabic word referring to the Muslim community.

purported to identify "Just Terror Tactics," and encouraged ISIS supporters to target large gatherings of people, such as conventions and celebrations, pedestrian-congested streets, and festivals "[i]n a bid to ensure utmost carnage upon the enemies of Allah." Another article extolled the work of suicide bombers in Iraq who detonated explosive vests in public places. The image from the magazine below celebrated ISIS attacks that resulted in mass casualties, including those conducted through "explosive belts" and "rigged vehicles."²⁷

²⁷ "Rafidah," an Arabic word appearing in that graphic, means "those who reject," and is often used by Sunni Muslim extremists to refer to Shia Muslims.



h. In another issue of Rumiya found on the hard drive, an article encouraged ISIS supporters to target churches and the United States. Specifically, that article included a photograph of a church in the United States with the caption “a popular crusader gathering place waiting to be burned down.”

i. The hard drive contained a video showing ISIS fighters firing rockets, with an overdub of a purportedly “inspirational” speech with English subtitles. In that speech,

the speaker proclaimed, "We will conquer your Rome, break your crosses, and enslave your women."

j. The hard drive also contained guidance on security protocols (sometimes referred to as operational security or "opsec"), including techniques for concealing one's online presence and communicating securely using encrypted messaging applications, such as Telegram, WhatsApp, and Threema.

k. The ISIS syllabi and materials found on Ilham's hard drive mirror NAUFAR's and other ISIS in Sri Lanka members' description of the trainings Zahran and NAUFAR led. The topics the witnesses described replicate the information found on the hard drive, including the firearms and explosives trainings the ISIS in Sri Lanka members underwent. Similarly, NAUFAR and other ISIS in Sri Lanka members reported using the encrypted messaging applications ISIS materials encouraged them to employ.

5. Social Media and Messaging Providers' Records Confirm that NAUFAR, Zahran, and MILHAN Exchanged ISIS Materials and Discussed the Group's Leadership and Goals

29. The FBI obtained records from various social media and communications providers, such as Facebook, Google, and Microsoft. As detailed below, those records show that Zahran, NAUFAR, and MILHAN communicated with each other about ISIS, discussed ways that ISIS in Sri Lanka could advance ISIS's global mission, and discussed conducting mass-casualty attacks in ISIS's name.

a. *Records Identifying NAUFAR's, ZAHHRAN's, and MILHAN's Facebook Accounts*

30. Facebook records for an account with the username "Nowfer Mohammad" ("NAUFAR's Facebook Account") show that the account was registered using the email address nowfer78@hotmail.com ("NAUFAR's Hotmail Account"), and that its user's hometown was listed as Kattankudy, Sri Lanka - where, during his interviews with FBI, NAUFAR claimed to have co-founded a Muslim organization with Zahran. During NAUFAR's voluntary interviews with FBI special agents, NAUFAR admitted that NAUFAR's Hotmail Account was his, that he used a Facebook account, and that the username for that account was either "Nowfer Mohammad" or "Nowfer Mohamad." Facebook disabled NAUFAR's Facebook Account on April 27, 2019.

31. Facebook records for an account with the username "Zahran Hashim," ("Zahran's Facebook Account"), show that the account was registered with the email zahranmufsira@gmail.com. Google records show that the recovery email address for zahranmufsira@gmail.com was zahranntj@gmail.com ("Zahran's Gmail Account"). Both email addresses use Zahran's name and Zahran's Gmail Account includes the letters "ntj" - the acronym for the organization Zahran founded in 2009. In addition, publicly available information for Zahran's Facebook Account shows numerous photographs of an individual I recognize to be Zahran. Zahran's Facebook Account was disabled on October 29, 2019.

32. Facebook records for an account with the username "Ahmed Milhan," ("MILHAN's Facebook Account"), was registered

with the email address, hmamilhan@gmail.com ("MILHAN's Gmail Account"). During MILHAN's interviews with the FBI, MILHAN admitted that MILHAN's Gmail Account belonged to him. MILHAN's Facebook Account was deactivated on October 16, 2018.

b. NAUFAR Uses Facebook to Declare His Support for ISIS in Posts Made to His Facebook Page

33. Facebook records show that NAUFAR communicated his support of ISIS to others. For example:

a. On April 11, 2016, a Facebook user posted on NAUFAR's Facebook page that he thought NAUFAR had been arrested for supporting ISIS due to NAUFAR's lack of Facebook activity. NAUFAR responded, in the Tamil language, "There is a chance for many who will search for reasons why I support ISIS? =D I can't change my stances for the fear of being arrested, right?? ;)"

b. On April 28, 2016, a Facebook user posted the following question in the Tamil language on NAUFAR's Facebook page: "Do you accept ISIS' caliph²⁸...?" NAUFAR responded, in the Tamil language, "The answer to your question is yes." The same user later asked: "Then why you did not take the bayat yet?" NAUFAR responded with a smiley face emoji.

c. On May 11, 2016, NAUFAR responded to a Facebook post asking about his support for "1515." (Based on my training and experience, I know that ISIS supporters communicating online sometimes use "1515" to indicate "ISIS" to avoid law enforcement detection.) NAUFAR explained why he supported ISIS,

²⁸ "Caliph" is an Arabic word meaning "leader."

specifically referencing ISIS's support for a world-wide Islamic caliphate.

d. On August 11, 2018, NAUFAR responded in the Tamil language to another Facebook post, "the United States is the enemy of Allah explain to me what is wrong with ISIS's creed??"

c. NAUFAR, MILHAN, and Zahran Use Facebook to Promote ISIS Ideology and Encourage Acts of Violence in ISIS's Name

34. Facebook records show that NAUFAR, Zahran, and MILHAN communicated with each other extensively using their Facebook accounts. For example, between July 1, 2014 and December 7, 2017, MILHAN's and NAUFAR's Facebook Accounts exchanged approximately 541 messages. Between March 20, 2016 and February 4, 2017, Zahran's and MILHAN's Facebook Accounts exchanged approximately 17 messages. Many of the communications discussed supporting ISIS and ways that ISIS in Sri Lanka could advance ISIS's global aims, such as:

a. On May 24, 2016, MILHAN's Facebook Account, NAUFAR's Facebook Account, and a third Facebook account exchanged a message regarding a British Broadcasting Corporation news article reporting the destruction of a Syrian airbase by ISIS. In response to that message, NAUFAR's Facebook Account posted a "thumb's up" emoji, and MILHAN's Facebook account commented in the English language, "Major offensive, May Allah protect and bless our Mujahideen victory."

b. On January 4, 2016, MILHAN's Facebook Account sent a private message to NAUFAR's Facebook Account and other

accounts that read, in the English language: "Al-Hamdulillah²⁹ since last more than a year I've been spending an hour every day to listening to Awlaki speech." Later that day, MILHAN's Facebook Account sent a second private message referring to Awlaki and stated "which helps me in both way to improve native English and studying shareeya."³⁰

c. On January 4, 2016, MILHAN's Facebook Account sent a message to NAUFAR's Facebook Account and others that read, in the English language: "in sha alkAh³¹ we will continue to wage jihad and invade your land where you will be ruled by the shria."

d. On January 11, 2017, Zahran's Facebook Account, referring to a photograph depicting an elderly man carrying a shoulder-fired rifle and what appears to be an ISIS flag, posted a message on NAUFAR's Facebook Account that read, in the Tamil language: "they are the good people who sold the life of this world for the hereafter. And Allah Kabul³² to the holy war." Based on my training and experience, I understand this post to be a reference to the belief held by many Islamic extremists that if one dies while waging violent jihad, they will be rewarded in the afterlife.

²⁹ "Alhamdulillah" is an Arabic phrase meaning "praise be to Allah," and is sometimes translated as "thank Allah."

³⁰ "Sharia" is an Arabic word referring to Islamic law.

³¹ The Arabic word "inshallah" means "if Allah wills it" or "god willing."

³² Based on my training and experience, I know that "Kabul" is the largest city in Afghanistan, where Islamic extremists been engaged in decades of violent conflict.

*d. NAUFAR and Zahran Exchange Messages
Supporting ISIS via Email*

35. NAUFAR and Zahran also communicated with each other privately over email and discussed their shared support for ISIS and violence.

36. Microsoft records show that NAUFAR's Hotmail Account exchanged seven emails with Zahran's Gmail Account between November 25, 2012 and February 27, 2017. Those emails include endorsements of ISIS ideology and tactics and the dissemination of ISIS-created materials, including the following messages:³³

a. On August 24, 2016, Zahran's Gmail Account emailed NAUFAR's Hotmail Account an ISIS article that condemned Muslims who supported or befriended "polytheists," a term that the article used to refer to all non-Muslims, and advocates violence and enmity against them.

b. On September 29, 2016, Zahran's Gmail Account emailed NAUFAR's Hotmail Account the September 26, 2016 edition of al-Naba, the official weekly newspaper of ISIS's central media office. The newspaper contained several articles addressing topics such as: martyrdom attacks perpetrated against Muslims, non-Muslims, and physical infrastructure; details of ISIS military operations, including attacks on U.S. military aircraft and ground vehicles; the assassination of Syrian government officials; editorials concerning foreign officials, including the Turkish President; and theological discussion focused on Quranic verses.

³³ These messages were originally written in the Arabic language and translated by an Arabic-language interpreter.

c. On February 27, 2017, Zahran's Gmail Account emailed NAUFAR's Hotmail Account the first edition of an ISIS-inspired newsletter entitled "al-Malhama."³⁴ The newsletter included a biography of one of the Prophet Muhammad's disciples; a photograph of Abu Musab al-Zarqawi,³⁵ with a caption assigning him a respectful title; artwork promoting violence (indicated by a sword raised to the sky) to liberate oppressed Muslim people (depicted as praying behind barbed wire); and articles, poetry, and quotations from al-Baghdadi and other well-known jihadis celebrating the liberation of prisons by ISIS fighters, including Abu Ghraib, a prison in Iraq.

G. Mohamed Anwar Mohamed RISKAN

37. As detailed below, RISKAN is an ISIS member and supporter, was a member of the group called ISIS in Sri Lanka, attended a Zahran-led training course, procured safe houses, helped manufacture the IEDs used in the Easter Attacks, and was asked by Zahran to participate in the Easter Attacks.

1. RISKAN's Admissions to the FBI

38. On May 15, 2019 and March 7, 2020, FBI special agents conducted recorded interviews of RISKAN at CID headquarters. RISKAN made the following statements, among others:

³⁴ In Islamic eschatology, al-Malhama al-Kubra refers to a great battle to occur at the end of time.

³⁵ Based on my training and experience, I know that Abu Musab al-Zarqawi was a Jordanian citizen who founded al-Qa'ida in Iraq, the organization that evolved into ISIS. Al-Zarqawi was killed by a U.S. air strike in June 2006.

a. *RISKAN Joins ISIS*

a. In late 2017 or early 2018, at Zahran's invitation, RISKAN attended a two-day training program. During the training, RISKAN learned about ISIS ideology and was trained by Hasthun (the St. Sebastian's suicide bomber) and MILHAN in the manufacture and use of explosives and the operation of firearms – specifically the Type-56 rifle and a pistol. After the training, RISKAN and the other participants pledged allegiance to ISIS.

b. Zahran first identified himself and his followers as ISIS members during a mid-2018 lecture in Hambantota, a town on Sri Lanka's southern coast.

b. *Zahran Coordinates the Transfer of 800,000 Rupees to RISKAN*

c. In January 2019, RISKAN received 800,000 rupees (approximately \$4,000 USD) through a bank transfer. At the time, RISKAN did not know the origins of that money, but he later learned from another Zahran follower that Zahran had coordinated the transfer. Zahran told RISKAN to use the money to purchase a sport utility vehicle for Zahran but then later told RISKAN to give the money to M.S.M.N., who acted as Zahran's emissary in Kurunegala, a city in central Sri Lanka, for an unspecified purpose. RISKAN followed Zahran's instruction.

c. RISKAN Procures Safe Houses for Co-Conspirators and Purchases and Transports Chemicals Used to Manufacture IEDs

d. Beginning in December 2018, at Zahran's direction, RISKAN procured safe houses for ISIS in Sri Lanka members.

e. In February 2019, while RISKAN was in Colombo, Zahran gave RISKAN 200,000 rupees and instructed him to go with Co-Conspirator 3³⁶ to purchase chemicals. Zahran instructed Hasthun and MILHAN to purchase laboratory equipment, including glass beakers. Zahran instructed the shoppers to return to the Negombo safe house after making their purchases.

f. RISKAN and Co-Conspirator 3 visited a jewelry-making supplier and two other merchants from whom Co-Conspirator 3 purchased chemicals. RISKAN claimed not to know the type of chemicals Co-Conspirator 3 purchased. Mubarak (the Kingsbury suicide bomber) and Co-Conspirator 1 picked up RISKAN and Co-Conspirator 3 at a park and drove them and their purchases to the Negombo safe house. The chemicals remained at the Negombo safe house until they were transferred to the Panadura safe house in early April 2019.

g. Also in early April 2019, at Zahran's direction, RISKAN, Co-Conspirator 2, Hasthun, and Mubarak went to Oddamavadi, a town on Sri Lanka's east coast, where they purchased ten bags of urea fertilizer and returned with the bags to the Panadura safe house.

³⁶ The conduct of four co-conspirators is described in the complaint. The co-conspirators' identities are known but because they are not charged in the complaint they remain unnamed.

h. At some point in April 2019, RISKAN saw ten boxes of ball bearings at the Panadura safe house, on Sri Lanka's southwest coast.

d. *RISKAN Transports Chemicals Used to Manufacture IEDs from the Negombo Safe House to Nintavur, Sri Lanka*

i. On April 10, 2019, Hasthun instructed RISKAN to transport urea and chemical bins from the Negombo safe house to Nintavur, a town in eastern Sri Lanka approximately five miles from the coastal city of Kalmunai. The group transported the items from Negombo out of fear that the police, who were reported to be conducting drug searches in the area, would discover their bomb-making materials.

j. Later that day, Mubarak called a truck driver, who arrived at the Negombo safe house at approximately 10:30 p.m. Aazath (the Zion suicide bomber), Mubarak, and Co-Conspirator 2 loaded the truck, and RISKAN accompanied the truck's driver to Nintavur, where they left the urea and chemical bins at a store belonging to an associate. After making several additional stops, RISKAN and the truck driver drove to Kalmunai, where RISKAN paid the driver 39,000 rupees and two packages of dates for his services. Later that evening, RISKAN traveled by bus from Kalmunai to Negombo and then to the Panadura safe house.

e. *RISKAN and the Co-Conspirators Test and Build IEDs*

k. On April 15, 2019, RISKAN, Hasthun, Co-Conspirator 2, Rilwan (Zahran's brother who died in the

April 26, 2019 shootout), and Mubarak tested an IED at a beach in Batticaloa. RISKAN stayed at the Hotel³⁷ during the Batticaloa expedition. The IED exploded after the group's second attempt to trigger it.

l. After the test, the group traveled to the Panadura safe house where RISKAN and other ISIS in Sri Lanka members manufactured IEDs that could be carried in backpacks. RISKAN and Co-Conspirator 2 helped pack the IEDs with ball bearings. The group completed the IEDs on April 20, 2019, and the IEDs were then used in the Easter Attacks.

f. RISKAN Communicates with Other CO-Conspirators Using Encrypted Messaging Applications

m. In January 2019, Hasthun provided RISKAN with a smart phone that Hasthun had preloaded with the Threema messaging application and a contact list. RISKAN used that Threema application to communicate with some of the attackers as well as NAUFAR, Co-Conspirator 2, and MILHAN.

g. Zahran Asks RISKAN to Participate in the Easter Attacks

n. On April 18, 2019, Zahran asked RISKAN to participate in a "revenge mission," specifically referencing the Christchurch, New Zealand attacks³⁸ and ISIS's defeat at the

³⁷ Throughout this affidavit, I have referred to a hotel known by law enforcement as "Hotel" to protect that hotel's identity.

³⁸ According to media reports, on March 15, 2019, a single gunman conducted two consecutive mass-casualty attacks at a mosque and an Islamic center in Christchurch, New Zealand. The 28-year-old, white supremacist attacker livestreamed the shootings and murdered 51 people and injured 49.

Battle of Baghuz Fawqani. RISKAN claimed that he told Zahran that he did not want to participate in the "revenge mission," and Zahran ordered him to return to his hometown of Kuliypitiya, in northwest Sri Lanka.

o. Later, however, Zahran changed his mind and ordered RISKAN to remain at the Panadura house from April 18 to April 20, 2019.

p. The night before the Easter Attacks, Zahran provided a final briefing to Co-Conspirator 2, RISKAN, Hasthun (the St. Sebastian's suicide bomber), Ilham (one of the Shangri-La suicide bombers), Inshaf (the Cinnamon Grand suicide bomber), Lateef (the New Tropical Inn suicide bomber), Mubarak (the Kingsbury suicide bomber), Aazath (the Zion suicide bomber), and Muaath (the St. Anthony's suicide bomber) about the upcoming attacks. Zahran instructed RISKAN to go to a mosque in downtown Colombo at noon on April 21, 2019, to link up with any co-conspirators that may have survived the attacks.

q. Later on April 20, 2019, at Zahran's direction, RIKSAN left the Panadura safe house and, on his way back Kuliypitiya, he stopped at the Wattala safe house where he told NAUFAR and others to flee the area. On his way to Kuliypitiya, RISKAN received a call from Aazath on the phone Hasthun had provided. Aazath asked RISKAN where he was.

r. On April 21, 2019, at Zahran's direction and aware that the attacks had already begun, RISKAN returned to the Wattala safe house. When he arrived, NAUFAR and others were

already preparing to flee and invited RISKAN to join them, but he declined.

*h. RISKAN Attempts to Destroy the Phone
Provided to Him by his Co-Conspirators*

s. Approximately three days after the Easter Attacks, Rilwan called RISKAN and instructed him to delete the contents of his phone by "resetting" it and to meet Rilwan and NAUFAR. RISKAN, who was in Kuliypitiya when Rilwan called him, reset and attempted to destroy the phone Hasthun had provided.

t. During his March 7, 2020 interview with the FBI, RISKAN was shown a photograph of a Samsung J2 phone, which RISKAN identified as the phone Hasthun gave him. FBI special agents showed RISKAN a list of Facebook and Threema contacts that FBI had extracted from the Samsung J2 and RISKAN identified several contact numbers for ISIS in Sri Lanka members, including Co-Conspirator 2 and Rilwan.

2. Evidence Collected at the Batticaloa IED Test Site

39. In August 2019, FBI personnel traveled to the Batticaloa location where RISKAN, Co-Conspirator 2, and other ISIS in Sri Lanka members described testing an IED the group had manufactured. According to FBI and forensic reports, the FBI photographed damaged metal sheets and seized a ball bearing. According to an FBI SABT, the items were in a state consistent with being exposed to a high-intensity explosion and the metal sheets appeared to have been perforated by shrapnel,

specifically ball bearings. The below photograph shows the perforated metal sheets the FBI photographed.



3. RISKAN's and Co-Conspirator 2's Fingerprints Recovered from the Panadura Safe House

40. On April 22, 2019, a Sri Lankan Criminal Records Department ("CRD") officer obtained latent fingerprints from the Panadura safe house. An FBI special agent digitally copied and stored those latent fingerprints and provided them to TEDAC. On May 4, 2019, at CID headquarters, FBI special agents fingerprinted RISKAN and Co-Conspirator 2. On May 4 and 5, 2019, a TEDAC physical scientist compared the latent fingerprints obtained from the Panadura safe house and the fingerprints taken from RISKAN and Co-Conspirator 2 and determined that the fingerprints taken from the Panadura safe house matched those taken from Co-Conspirator 2 and RISKAN.

4. W.S.L.'s Statement Regarding RISKAN's Transport of Urea and Sulfuric Acid

41. On June 17, 2019, FBI special agents interviewed W.S.L., a Sri Lankan truck driver who was hired to drive RISKAN

from the Negombo safe house to Ampara (an administrative district in southeast Sri Lanka) ten days before the Easter Attacks. W.S.L. provided the following information:

a. W.S.L. is a truck driver. On April 10, 2019, W.S.L. was hired to drive a man, whom he later identified as RISKAN from photographs the FBI showed him.

b. W.S.L. picked RISKAN up from the Negombo safe house at approximately 11:15 p.m. and helped RISKAN and others load the truck with, among other things, household furnishings and plastic containers. According to W.S.L., these containers weighed approximately 25 kilograms (approximately 55 pounds) and appeared to contain chemicals. W.S.L. asked RISKAN what was in the containers and RISKAN told W.S.L. that they contained sulfuric acid for his goldsmithing business.

c. While at the Negombo safe house, Co-Conspirator 2, whom W.S.L. identified from a photograph the FBI showed him, invited W.S.L. to take a nap before the journey but W.S.L. declined the invitation.

d. After packing the truck, W.S.L. and RISKAN drove toward Ampara. During the drive, RISKAN told W.S.L. that instead of going to Ampara as planned they would first go to Kalmunai. At a stop along the way, RISKAN went into a store and later rushed out, telling W.S.L., "We have to go." RISKAN told W.S.L. that there were police inside the store.

e. RISKAN later directed W.S.L. to stop at a concrete block house and tea shop near Sammanthurai, a town in eastern Sri Lanka, and together they unloaded the truck. W.S.L. noticed

a container labeled as "50 kilograms of urea." W.S.L. asked RISKAN what the urea was for, and RISKAN told him that it was fertilizer.

f. RISKAN then directed W.S.L. to a residence in Ampara, where W.S.L. assisted RISKAN in unloading the remaining items. RISKAN provided W.S.L. with two containers of dates and paid W.S.L. 29,800 rupees for his services.

5. Statement of M.P.F. Regarding RISKAN and Mubarak's Rental of the Negombo Safe House

42. On June 14, 2019, FBI special agents interviewed a caretaker of the Negombo safe house, M.P.F., who provided the following information:

a. M.P.F. and her husband, J.F., are caretakers for a residence in Negombo, which they advertised for rent in 2019. M.P.F. and J.F. received a call from a man they later identified from photographs the FBI provided as Mubarak (the Kingsbury suicide bomber). Mubarak asked M.P.F. and J.F. if the residence was available for rent.

b. M.P.F. and J.F. met Mubarak and a man they later identified from photographs the FBI provided as RISKAN, at St. Sebastian's to discuss the property rental. M.P.F. and J.F. then showed Mubarak and RISKAN the Negombo residence.

c. On February 3, 2019, Mubarak signed a lease to rent the property. Mubarak was again accompanied by RISKAN when he signed the contract.

d. M.P.F. provided a copy of that lease agreement, dated February 3, 2019, and signed by Mubarak, to the FBI. It

shows that Mubarak rented the Negombo safe house for one year for a total of 516,000 rupees.

6. Statement of A.S.M.I. Regarding RISKAN and Mubarak's Rental of the Panadura Safe House

43. On June 20, 2019, FBI special agents interviewed A.S.M.I. while he was in custody at CID headquarters. A.S.M.I. made the following statements among others:

a. In December 2018, A.S.M.I. posted an advertisement for the Panadura safe house on a website and, approximately one week later, Mubarak, whom A.S.M.I. later tentatively identified from photographs the FBI showed him, called A.S.M.I. to inquire about the property. A.S.M.I.'s sisters showed Mubarak the house in person on or before February 13, 2019.

b. That same month, Mubarak signed a lease to rent the Panadura residence for one year, starting on February 13, 2019, and agreed to pay 40,000 rupees per month, with a 40,000 rupee deposit. A.S.M.I. was present for the lease signing. RISKAN, whom A.S.M.I. identified from a photograph the FBI showed him, signed the lease as a witness.

c. During the lease period, A.S.M.I. made unannounced visits to the house. On two occasions A.S.M.I. saw RISKAN at the residence.

7. Statement of M.F. Regarding Mubarak's Rental of the Panadura Safe House

44. Based on my review of FBI reports, I know that on June 25, 2019, M.F., a relative of the owner of the Panadura safe house, provided the FBI with a photograph of the first page

of the lease agreement between A.S.M.I. and Mubarak. Mubarak's Sri Lankan national identification number appears on that document.

8. M.I.A.A.'s Post-arrest Statements Regarding RISKAN

45. On July 23 and August 6, 2019, and March 16, 2020, FBI special agents interviewed M.I.A.A. at CID headquarters.

M.I.A.A. made the following statements, among others:

a. In January and November 2018, M.I.A.A. participated in two training programs led by Zahran. During the January training, Zahran invited the twelve participants to travel to Syria to join ISIS. According to M.I.A.A., he did not pledge allegiance to ISIS because he claimed to need more information about ISIS.

b. During the November 2018 training course, M.I.A.A. received firearms training and was shown how to use a Type-56 rifle. According to M.I.A.A., he and the other attendees pledged to follow the Islamic religion generally and to obey Zahran, but M.I.A.A. claimed not to have pledged allegiance to ISIS specifically.

c. On January 8, 2019, Zahran's brother, Zainee, gave M.I.A.A. the equivalent of 800,000 rupees in cash, which M.I.A.A. deposited in RISKAN's bank account at Commercial Bank in Sri Lanka. According to M.I.A.A., he received a 1,000-rupee commission from Zainee for making the deposit.

d. I reviewed a copy of a January 8, 2019 Commercial Bank deposit slip for RISKAN's bank account that shows M.I.A.A. deposited 800,000 rupees into that account.

46. Based on my review of FBI reports, I know the following:

a. During their investigation of the Easter Attacks, Sri Lankan authorities recovered a damaged Samsung J250 mobile phone and provided that phone to FBI special agents.

b. During an interview with FBI special agents, RISKAN identified the phone from a photograph as his own and said that he attempted to destroy that device several days after the Easter Attacks, after receiving a phone call from Rilwan instructing him to reset the phone. According to RISKAN, he damaged the phone because he no longer wanted to be associated with ISIS in Sri Lanka.

c. FBI special agents forensically examined the phone and found a photograph of RISKAN that contained geolocation metadata. That metadata showed that on April 16, 2019, at 12:15 p.m., the phone was located approximately four miles south of the Batticaloa IED test site. That location corresponds with the Hotel, where RISKAN told FBI special agents that he had stayed while testing the IED.

9. Statements of Chemical Supply Store Employees Regarding RISKAN and Co-Conspirator 3's Purchases

47. On June 27, 2019, FBI special agents interviewed S.S., a chemical-supply store employee, at Company 1.³⁹ S.S. provided the following information:

a. S.S. owns Company 1 and had a longstanding business relationship with Co-Conspirator 3 because of Co-Conspirator 3's work in the jewelry business.

b. In March 2019, RISKAN and Co-Conspirator 3 came to Company 1. S.S. identified RISKAN and Co-Conspirator 3 from a photograph the FBI provided. Co-Conspirator 3 directed Company 1 employees to purchase, on his behalf, sulfuric acid from Company 2 and nitric acid from Company 3. Co-Conspirator 3 paid for these purchases in cash. Co-Conspirator 3 explained that local chemical stores would not sell such chemicals to customers with whom they were unfamiliar.

48. On August 2, 2019, FBI special agents interviewed S.G.S., a chemical-supply store employee, at Company 1. S.G.S. provided the following information:

a. S.G.S. identified RISKAN and Co-Conspirator 3 from a photograph the FBI provided. RIKSAN and Co-Conspirator 3 purchased mixing bowls and nitric and sulfuric acid from Company 1. Co-Conspirator 3 usually purchased one or two cans of acid, but during his last visit to the store, he purchased five cans of sulfuric acid and five cans of nitric acid.

³⁹ To protect the identity of certain business, I have designated them as "Company 1," "Company 2," etc.

H. Ahamed MILHAN Hayathu Moahmed

49. As detailed below, MILHAN is an ISIS member and supporter and was an ISIS in Sri Lanka member who provided firearms training to the group, murdered a police officer at Zahran's direction, shot a suspected informant, facilitated the purchase of explosive materials, and scouted a location for a separate terrorist attack.

1. MILHAN's Admissions to the FBI

50. On July 3 and 4, 2019, FBI special agents conducted recorded interviews of MILHAN at CID headquarters. MILHAN made the following statements, among others:

a. *MILHAN Meets NAUFAR and Zahran and Pledges Allegiance to ISIS*

a. In 2015 or 2016, MILHAN met NAUFAR in Qatar, where MILHAN was working as an engineer. MILHAN learned about ISIS from NAUFAR and from reviewing NAUFAR's Facebook page and blog. While in Qatar, MILHAN and NAUFAR expressed their mutual support for ISIS and the need to establish an Islamic caliphate. MILHAN and NAUFAR both returned to Sri Lanka in 2017.

b. Later in 2017, Zahran, using Rilwan's Telegram account, contacted MILHAN and requested that they meet at Zahran's mother's home in Kattankudy. MILHAN accepted the invitation, and during that meeting, Zahran affirmed his support for ISIS and told MILHAN that he was seeking contacts with ISIS leadership in Syria to formally pledge allegiance to ISIS.

c. Approximately two weeks later, Zahran organized a meeting in Anuradhapura, a town in north central Sri Lanka,

where eleven participants recorded themselves pledging allegiance to ISIS. In the video, the participants (including Zahran, NAUFAR, and MILHAN) covered their faces to conceal their identities and one participant held a Type-56 rifle. After the video was recorded, NAUFAR described Zahran as the "emir of ISIS," referring to ISIS in Sri Lanka, and identified himself as the "second emir." Rilwan served as head of the group's military division, and Hasthun led the group's media division and "Sharia Committee." MILHAN believed himself to be a member of ISIS.

b. *MILHAN and NAUFAR Create a Training Program and MILHAN Trains the Group in Using Firearms*

d. In 2018, NAUFAR and MILHAN created a training program for ISIS in Sri Lanka members called the "Tarbiya Program."⁴⁰ The trainings provided instruction on ISIS ideology, defensive strategies, and the purported obligation of Muslims to participate in violent jihad.

e. Zahran directed MILHAN to provide weapons trainings and MILHAN showed ISIS in Sri Lanka members how to operate a Type-56 rifle and 9-millimeter pistol. Other ISIS in Sri Lanka members, including NAUFAR and Zahran, lectured about ISIS ideology, the need for an Islamic caliphate, offensive and defensive jihad, and, at the end of the trainings, the attendees swore allegiance to ISIS. Zahran explained the meaning and significance of the pledge to the attendees in their native language before having them recite it in Arabic.

⁴⁰ "Tarbiya" means "education" in Arabic.

c. At Zahran's Direction, MILHAN and Co-Conspirator 1 Murder Two Sri Lankan Police Officers

f. Zahran and other co-conspirators attempted to obtain firearms, such as AK-47s and M-16 rifles on the black market. After Zahran's efforts to obtain black-market firearms failed, Zahran tasked Rilwan and Co-Conspirator 1 with identifying a police station from which the group could steal firearms.

g. During the planning phase of the operation, Zahran ordered MILHAN to carry a Type-56 rifle and use it to kill the police officers. The group's Sharia Committee, which included NAUFAR and Zahran, approved the operation and instructed the team not to leave any officer alive.

h. On the day of the operation, MILHAN, Co-Conspirator 1, and two other ISIS in Sri Lanka members arrived at the police station at 2:00 a.m. and found one officer sleeping inside and another officer sitting in a chair outside the station. MILHAN directed the officer in the chair to lie face down on the ground and the officer complied. Co-Conspirator 1 and another ISIS member went into the station and stabbed the other officer. When Co-Conspirator 1 returned, he told MILHAN to shoot the police officer lying on the ground, and MILHAN shot the officer in the back of the head. The group stole the officers' two revolvers and five rounds of ammunition.

d. At Zahran's Direction, MILHAN Shoots a Suspected Informant

i. After two ISIS in Sri Lanka members were arrested for defacing a statue of the Buddha, the group's Sharia Committee decided to kill an individual they suspected of providing information to the police. Zahran instructed MILHAN to shoot the man. MILHAN and Co-Conspirator 1 went to the man's house and MILHAN shot the man in the ear while he was sleeping.

e. At Zahran's Direction, MILHAN Scouts Possible Locations for Attacks on Civilians

j. On February 4, 2019 - Sri Lanka's Independence Day - Zahran directed MILHAN, RISKAN, and others to surveil a parade route along Galle Face Road in Colombo. After they conducted surveillance, Zahran told MILHAN and RISKAN that he wished to conduct a suicide attack during the Kandy Perahera festival, which was scheduled to be held along a similar parade route during the summer.

f. MILHAN Observes ISIS in Sri Lanka Members Manufacturing IEDs

k. According to MILHAN, Hasthun had studied explosives making. Hasthun at first rejected the idea of making an explosive device using urea and favored using TNT.

l. At Zahran's direction, M.M.M.H. procured approximately 1,500 detonators and gel dynamite. In December 2018, MILHAN accompanied Zahran and M.M.M.H. and witnessed M.M.M.H. purchase approximately 100 detonators. The purchased detonators were brought to the Puttalam safe house. After Sri Lankan authorities raided the Puttalam safe house, M.M.M.H.

purchased a second set of detonators at Zahran's direction, though MILHAN was not involved in this transaction. In late January or February 2019, MILHAN paid M.M.M.H. 150,000 rupees from Zahran for a third set of detonators. MILHAN arranged the transaction with M.M.M.H. using the encrypted messaging application Threema.

m. At the Puttalam safe house, MILHAN witnessed ISIS in Sri Lanka members drying explosive material on white cloth.

n. In February or March 2019, MILHAN accompanied Hasthun, Co-Conspirator 1, and Ilham on a trip to purchase glass beakers at a market in Colombo.

g. MIHLAN Joins NAUFAR in Confronting Zahran before the Easter Attacks

o. In April 2019, MIHLAN and others confronted Zahran and attempted to remove him as leader of the group. According to MILHAN, Zahran's ideology was too extreme, Zahran was a liar and a womanizer, and Zahran failed to share his plans for the group with its members. MILHAN claimed that he made a secret plan to turn Zahran over to the police, which he did not disclose to NAUFAR because NAUFAR shared Zahran's ideology.

p. On April 17, 2019, MILHAN left Sri Lanka for Saudi Arabia to visit Mecca, a Muslim holy city. According to MILHAN, he would have stopped Zahran had he not run out of time before his trip.

q. MILHAN claimed that he did not have prior knowledge of the Easter Attacks and that he did not learn of

that event until after it happened, while he was in Saudi Arabia. He also claimed not to approve of the attacks.

51. From my review of FBI reports of investigation, I know that in May 2019, Saudi Arabian authorities detained MILHAN and deported him to Sri Lanka on June 13, 2019.

2. MILHAN's Google Drive Account

52. From my review of the contents of the Google Drive subscribed to MILHAN's Gmail Account, I learned that MILHAN saved online material supporting ISIS, including the following:

a. Copies of Microsoft Word documents, one of which was written in English and entitled "Why IS Didn't Attack Israel" and the other of which was written in the Tamil language and entitled "What is the Islamic State."

b. Photographs of al-Zarqawi and al-Baghdadi and multiple photographs of fighters waving the ISIS flag and brandishing firearms.

c. A collage of images critical of a Muslim cleric for tweeting his support for the victims of the Pulse nightclub shooting, which occurred in Orlando, Florida.

d. An issue of Dabiq and two PDF documents entitled "the-islamic-state ... newsletter."

e. A draft magazine entitled "al-Ghuraba" containing ISIS images and messages translated into the Tamil language.

3. Statement of Sri Lankan Chief Inspector
D.M.W.L.D. Regarding the November 28, 2018 Police
Murders

53. On March 7, 2020, the FBI interviewed Sri Lankan Chief Inspector D.M.W.L.D. I have reviewed the report of that interview and I learned the following:

a. On November 28, 2018, assailants murdered two Sri Lankan police officers who were manning a checkpoint between Vavunatheevu and Batticaloa. The murders occurred between approximately 2:10 a.m. and 2:45 a.m. One officer was stabbed 41 times as the officer slept during a break. The other officer was shot in the head and back with a Type-56 rifle. The assailants stole both of the murdered officers' revolvers and ten rounds of ammunition.

b. Sri Lankan authorities recovered one of the stolen revolvers from the Puttalam safe house.

I. Co-Conspirator 1

54. As detailed below, Co-Conspirator 1 is an ISIS member and supporter, and was an ISIS in Sri Lanka member who, at Zahran's direction, participated in the murder of two Sri Lankan police officers, stole their weapons, and procured explosives materials prior to the Easter Attacks.

55. On May 10, 2019, FBI special agents interviewed Co-Conspirator 1 at CID headquarters. Co-Conspirator 1 made the following statements, among others:

a. Co-Conspirator 1 knew Zahran since 2008. In 2018, Zahran's brother married Co-Conspirator 1's daughter.

b. At Zahran's direction, Co-Conspirator 1 participated in the above-described murder of two Sri Lankan police officers, one of whom Co-Conspirator 1 stabbed and the other MILHAN shot.

c. At Zahran's direction, Co-Conspirator 1 purchased acids from a store on Bankshall Street in Colombo and delivered the acids to the Panadura safe house. Co-Conspirator 1 stated that the acids were used to make a bomb and that M.M.M.H. provided "gel dynamite."

d. In March 2019, NAUFAR organized a meeting at the Wattala safe house. NAUFAR and others confronted Zahran and, according to Co-Conspirator 1, wished to steer the group away from violence and out of Zahran's leadership. Zahran resisted NAUFAR's efforts and left the meeting with RISKAN. Co-Conspirator 1 reported that that was the last time he saw Zahran. Thereafter, Zahran instructed Co-Conspirator 1 to remain at the Wattala safe house, while Zahran and others remained at the Negombo safe house.

e. On the morning of April 21, 2019, RISKAN came to the Wattala safe house and warned those present there, including Co-Conspirator 1, to flee because Zahran was involved in a suicide bombing and the Wattala safe house was rented in the name of another suicide bomber. Co-Conspirator 1 claimed that he did not know about the attacks before they occurred.

J. Co-Conspirator 2

56. As detailed below, Co-Conspirator 2 is an ISIS member and supporter and was an ISIS in Sri Lanka member, procured

explosives materials, and manufactured and tested the types of IEDs used in the Easter Attacks.

57. On May 11, 2019 and March 10, 2020, FBI special agents conducted recorded interviews of Co-Conspirator 2 at CID headquarters. During the first interview, Co-Conspirator 2 admitted knowledge of and his participation in events that Co-Conspirator 2 then denied during the second interview. Co-Conspirator 2's contradictory statements are noted in footnotes. Co-Conspirator 2 made the following statements, among others:

a. In or after 2015, Co-Conspirator 2 attended classes led by Zahran, during which Zahran urged Muslims to defend themselves against persecution in Sri Lanka and abroad. During these trainings, Zahran spoke reverentially about al-Baghdadi and ISIS, which he cited as an example of Muslims uniting in self-defense. Co-Conspirator 2 admitted to sharing Zahran's views on self-defense and to following Zahran but denied joining ISIS.

b. In March 2019, Co-Conspirator 2 was living with Zahran at the Panadura safe house. The following month, the group split into two factions, with some members following NAUFAR and others following Zahran.

c. Beginning in April 2019, Zahran directed Co-Conspirator 2 to obtain unspecified materials to construct IEDs.⁴¹ At an unspecified later date, Co-Conspirator 2 and other

⁴¹ During his March 10, 2020 interview, Co-Conspirator 2 denied having any knowledge of or participation in the group's IED construction.

members of Zahran's group acting at Zahran's direction manufactured IEDs at the Panadura and Negombo safe houses. Co-Conspirator 2 described Hasthun as the primary IED builder and reported that M.M.M.H. provided "blue dynamite." He identified the IED components as including ammonium, ball bearings, and switches. Co-Conspirator 2 admitted to helping to mix and dry the chemicals. He also reported that Zahran's group purchased ten backpacks in which to carry the IEDs.

d. Co-Conspirator 2 reported that, at an unspecified time, members of Zahran's group traveled to Batticaloa to test an IED that Hasthun had manufactured.⁴² The group affixed an IED to a motor scooter near the beach. At first, the IED failed to detonate because of a faulty battery. After the battery was fixed, the IED exploded.

e. On April 20, 2019 - the day before the Easter Attacks - Zahran announced his plan to execute the attacks to his followers, including Co-Conspirator 2.⁴³ Zahran told Co-Conspirator 2 that the attacks were revenge for the March 2019 attacks in Christchurch, New Zealand. According to Co-Conspirator 2, he told Zahran that he did not want to participate in the attacks.

f. That evening, at Zahran's direction, Co-Conspirator 2 transported items, including a refrigerator,

⁴² During his March 10, 2020 interview with the FBI, Co-Conspirator 2 denied any knowledge of an IED test in Batticaloa.

⁴³ During his March 10, 2020 interview, Co-Conspirator 2 denied that he was forewarned of the attacks.

boxes, and left-over bomb-making equipment, from the Panadura safe house to Kalmunai. After delivering those items to Kalmunai, Co-Conspirator 2, at Zahran's direction, returned to his hometown, Kuliypitiya.

g. Co-Conspirator 2 claimed to have learned of the attacks from social media around 4:00 p.m. on April 21, 2019.

K. Co-Conspirator 3

58. As detailed below, Co-Conspirator 3 is an ISIS member and supporter, was an ISIS in Sri Lanka member, attended a Zahran-led training program and obtained explosive materials at Zahran's direction.

59. On July 25, 2019, FBI special agents conducted a recorded interview of Co-Conspirator 3 at CID headquarters. Co-Conspirator 3 made the following statements, among others:

a. In approximately August 2018, at MILHAN's invitation, Co-Conspirator 3 attended a two-day training program in Hambantota, on Sri Lanka's southeast coast, where NAUFAR, Zahran, and others were present. On the second day of the program, Co-Conspirator 3 received firearms and weapons training. The participants also made a small IED using a mixture of unspecified chemicals. Zahran led trainings on ISIS ideology and the group watched ISIS beheading videos.

b. Sometime after January 2019, at Zahran's direction, Co-Conspirator 3 purchased approximately 15 gallons of nitric and sulfuric acid from commercial stores in Colombo. Co-Conspirator 3 claimed that he believed the chemicals were for Rilwan's use at his jewelry shop. Co-Conspirator 3 purchased

the chemicals from three different stores on the same day: Company 1, Company 4, and Company 5.

c. Co-Conspirator 3 helped Zahran and another, unspecified individual load the chemicals into vehicles. Afterwards, Zahran paid Co-Conspirator 3 5,000 rupees for his work.

d. After the Easter Attacks, Co-Conspirator 3 saw pictures of the chemicals used to make the IEDs in the news, and they appeared to him to be the same chemicals he purchased for Zahran.

e. Co-Conspirator 3 claimed to have no prior knowledge of the Easter Attacks.

L. Co-Conspirator 4

60. As detailed below, Co-Conspirator 4 is an ISIS member and supporter, was an ISIS in Sri Lanka member, attended a Zahran-led training course, provided his coconut estate as a safe house and training location for the group, and purchased materials used to build IEDs for the Easter Attacks.

61. On May 17, 2019, FBI special agents conducted a recorded interview of Co-Conspirator 4 at CID headquarters. Co-Conspirator 4 made the following statements, among others:

a. Co-Conspirator 4 owned a coconut estate in Puttalam, which also served as the Puttalam safe house.

b. In June 2018, Co-Conspirator 4 attended an ISIS training course that Zahran led. On their way to the training, the attendees were instructed to turn off their phones, use

codenames, and not reveal their true names or other personal information to the other attendees.

c. At the training, Zahran educated the group on ISIS and its goal to create a worldwide Islamic caliphate. MILHAN provided firearms training, demonstrating the use of a pistol and an AK-47. Hasthun demonstrated how to make a black-powder IED, which Co-Conspirator 4 understood was to be thrown like a hand grenade.⁴⁴ Each person in attendance chose whether they would serve as a "shooter" or a "bomber" and, at the end of the training, Co-Conspirator 4 and the participants pledged allegiance to ISIS.

d. On December 29, 2018, Co-Conspirator 4 agreed to pick up M.S.M.A., an ISIS member, at a Puttalam bus station and allow him to stay at Co-Conspirator 4's Puttalam estate. M.S.M.A. told Co-Conspirator 4 that he needed a place to hide because he was being sought by Sri Lankan authorities for desecrating a statue of the Buddha.

e. Between January 1 and January 9, 2019, NAUFAR, Zahran, Hasthun, MILHAN and others stayed at Co-Conspirator 4's Puttalam estate. At Zahran's direction, Co-Conspirator 4 purchased ten bags of urea fertilizer and ice and transported the items to the estate in a rented truck. Another member brought cans of acid to the estate.

⁴⁴ Based on my training and experience, I know that "black powder," also referred to as "gun powder," is a mixture of potassium nitrate, carbon, and sulfur.

f. Hasthun used the items Co-Conspirator 4 procured to manufacture a test explosive. Hasthun showed the group, including Zahran, MILHAN, and Co-Conspirator 1, how to mix the urea and acid in a glass beaker, which was placed in a bucket filled with ice. The mixture generated a white solution. Hasthun strained the water from the beaker using a cloth and laid out the remaining white particulate to dry.⁴⁵ At Hasthun's direction, the group members manufactured 100 kilograms of urea nitrate at Co-Conspirator 4's estate. Some of the white powder was buried underground in buckets.

62. Based on my review of FBI reports of interviews of Sri Lankan Officer-in-Charge ("OIC") J.M., Sri Lankan authorities recovered the following items from the Puttalam safe house: detonators, nitric acid, and three large barrels of white powder, potassium nitrate, switches, and white Christmas lights. According to OIC J.M., some of these items were buried underground.

63. On May 16, 2019, FBI special agents conducted a recorded interview of M.S.M.A. at CID headquarters. M.S.M.A. made the following statements, among others:

a. M.S.M.A. was a member of Sri Lanka's Jamaat-e-Islami ("SLJI").⁴⁶ In 2014, SLJI sent M.S.M.A. to Aleppo, Syria,

⁴⁵ Based on my discussions with an FBI SABB, I know that urea fertilizer, when mixed with acid, cooled in a bucket, and later dried, transforms into urea nitrate, a white, explosive substance. 100 kilograms of urea nitrate would have an explosive force approximately equal to 163 pounds of TNT.

⁴⁶ According to open-source information, SLJI is a socio-religious organization for Sri Lankan Muslims.

where he received 40 days of weapons and military training before returning to Sri Lanka.

b. In August 2018, M.S.M.A. attended a two-day training course Zahran led. Zahran and NAUFAR provided instruction on Islam and ISIS. Hasthun provided explosives training and MILHAN taught the group how to use a Type-56 rifle and a pistol. At the end of the training, the attendees, including M.S.M.A., swore allegiance to ISIS.

c. On December 26, 2018, M.S.M.A. and others vandalized Buddhist statues. M.S.M.A. and Zahran hid out together while the police investigated the vandalisms.

d. In March 2019, a rift developed between NAUFAR and Zahran. Those who chose to follow NAUFAR stayed at a safe house in Wattala, Sri Lanka - a suburb of Colombo. The rest continued to follow Zahran and stayed at the Panadura safe house.

e. Hasthun provided M.S.M.A. and other group members with mobile phones and ISIS in Sri Lanka members used Telegram and Threema on the phones to communicate with each other. Hasthun told them not to use the phones to make or receive phone calls.

V. CONCLUSION

64. For all the reasons described above, there is probable cause to believe that NAUFAR, RISKAN, and MILHAN conspired to provide, provided, and attempted to provide material supportive a to ISIS, in violation of 18 U.S.C. § 2339B, and that NAUFAR

and MILHAN aided and abetted the receipt of military-type training from ISIS, in violation of 18 U.S.C. §§ 2339D, 2.

Merrilee R. Goodwin, Special
Agent, Federal Bureau of
Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 11th day of December, 2020.

/S/ CHARLES F. EICK

HONORABLE CHARLES EICK
UNITED STATES MAGISTRATE JUDGE