



United States District Court
District of New Jersey

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL COMPLAINT
 :
 : Magistrate No. 07-M-2045 (JS)
 MOHAMAD IBRAHIM SHNEWER :

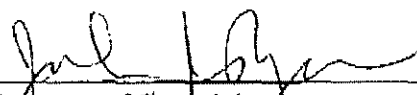
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about January 3, 2006 to on or about May 7, 2007, in Camden, Burlington, and Monmouth Counties, in the District of New Jersey, and elsewhere, defendant MOHAMAD IBRAHIM SHNEWER committed the following offense:

SEE ATTACHMENT A.

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B.

Attachment A and Attachment B are incorporated as if set forth in full herein.



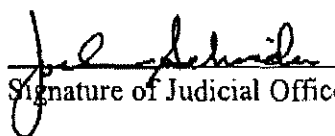
 Signature of Complainant
 John J. Ryan, Special Agent
 Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

May 7, 2007 _____ at
Date

Camden, New Jersey

Honorable Joel Schneider
United States Magistrate Judge
Name & Title of Judicial Officer

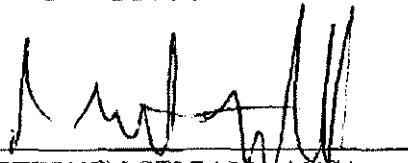


 Signature of Judicial Officer



CONTENTS APPROVED

UNITED STATES ATTORNEY

By: 
R. STEPHEN STIGALL, AUSA

Date: 5/7/07



ATTACHMENT A

From on or about January 3, 2006 to on or about May 7, 2007, in Camden, Burlington, and Monmouth Counties, in the District of New Jersey, and elsewhere, defendant

MOHAMAD IBRAHIM SHNEWER,

did knowingly and willfully conspire and agree with Dritan Duka, a/k/a "Distan Duka," a/k/a "Anthony Duka," a/k/a "Tony Duka," Eljvir Duka, a/k/a "Elvis Duka," a/k/a "Sulayman," Shain Duka, and Serdar Tatar, to kill officers and employees of agencies in the Executive Branch of the United States Government, namely, members of the uniformed services, while such officers and employees were engaged in and on account of the performance of official duties, and persons assisting such officers and employees in the performance of such duties and on account of that assistance, contrary to Title 18, United States Code, Section 1114.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, defendant MOHAMAD IBRAHIM SHNEWER committed and caused to be committed overt acts in the District of New Jersey, and elsewhere, including but not limited to:

- a. On or about January 3, 2006, MOHAMAD SHNEWER, DRITAN DUKA, ELJVIR DUKA, SHAIN DUKA, and SERDAR TATAR conducted firearms training in Gouldsboro, Pennsylvania.
- b. On or about August 11, 2006, MOHAMAD SHNEWER traveled to the United States Army base at Fort Dix, New Jersey to conduct surveillance.
- c. On or about August 11, 2006, MOHAMAD SHNEWER traveled to the United States Army base at Fort Monmouth, New Jersey to conduct surveillance.



d. On or about August 13, 2006, MOHAMAD SHNEWER traveled to Dover Air Force base in Dover, Delaware to conduct surveillance.

e. On or about August 13, 2006, MOHAMAD SHNEWER traveled to the United States Coast Guard Building in Philadelphia, Pennsylvania to conduct surveillance.

f. On or about November 28, 2006, SERDAR TATAR acquired a map of the United States Army base at Fort Dix, New Jersey, labeled "Cantonment Area Fort Dix, NJ" to be distributed to others.

g. On or about January 31, 2007, DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA collected weapons, including hand guns, shotguns, and semi-automatic assault weapons to be used in small arms training.

h. On or about February 1, 2007, DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA traveled by car from New Jersey to Pennsylvania in order to conduct firearms training.

i. On or about February 2, 2007, DRITAN DUKA, SHAIN DUKA, and ELJVIR DUKA conducted firearms training in Gouldsboro, Pennsylvania.

j. On or about February 4, 2007, MOHAMAD SHNEWER, DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA reviewed terrorist training videos.

k. On or about February 26, 2007, DRITAN DUKA and ELJVIR DUKA conducted tactical training in Cherry Hill, New Jersey.

l. On or about March 15, 2007, DRITAN DUKA and SHAIN DUKA conducted tactical training in Cherry Hill, New Jersey.

m. On or about April 6, 2007, DRITAN DUKA ordered four AK-47 Kalishnikov fully-automatic machine guns as well as M-16 firearms and handguns.



On or about April 27, 2007, MOHAMAD SHNEWER ordered an AK-47
Kalishnikov fully-automatic machine gun.

In violation of Title 18, United States Code, Section 1117.



ATTACHMENT B

I, John J. Ryan, am a Special Agent with the Federal Bureau of Investigation. I have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation as well as information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not necessarily included each and every fact known by the government concerning this investigation.

1. On or about January 31, 2006, a representative of a retail store informed officials of the Federal Bureau of Investigation ("FBI") that an individual had brought a video to their store to be duplicated into a digital video disk ("DVD"). That DVD depicted conduct - recorded as having occurred on January 3, 2006 - that the store representative described as disturbing. FBI agents reviewed the DVD in question. The DVD depicted 10 young men who appeared to be in their early twenties shooting assault weapons at a firing range in a militia-like style while calling for *jihad* and shouting in Arabic "Allah Akbar" ("God is Great").¹ The FBI and Joint Terrorism Task Force ("JTTF") immediately commenced an investigation into the activities of the men depicted in the DVD.

2. The FBI identified the 10 men depicted in the DVD, six of whom are: MOHAMAD SHNEWER, DRITAN DUKA, a/k/a "Distan Duka," a/k/a "Anthony Duka," a/k/a "Tony Duka," ELJVIR DUKA, a/k/a "Elvis Duka," a/k/a "Sulayman," SHAIN DUKA, SERDAR TATAR, and AGRON ABDULLAHU. Immigration and Customs Enforcement checks show that DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA are illegally residing in the United States.

3. In or about March 2006, a cooperating witness ("CW-1") successfully infiltrated this group by developing a relationship with MOHAMAD SHNEWER.² Beginning in or about March 2006, CW-1

¹ The term *jihad* as used in this Affidavit means a Muslim holy war or spiritual struggle against infidels.

² CW-1, a paid informant, has proven to be credible and reliable. Shortly before CW-1's involvement in the instant investigation, CW-1 had provided the FBI with information regarding significant criminal conduct. The FBI independently corroborated CW-1's information. CW-1's credibility in that matter was further supported



consensually recorded conversations with SHNEWER and with other targets of the investigation during meetings and telephone calls.

4. On or about April 14, 2006, CW-1 consensually recorded a meeting with MOHAMAD SHNEWER. During that meeting, SHNEWER stated that he and CW-1 should view a video stored on SHNEWER's computer, but that they had to do so in private because "it's about something that can lead to prison."

5. On or about April 28, 2006, during a consensually recorded meeting with CW-1, MOHAMAD SHNEWER downloaded a DVD from his laptop computer which SHNEWER then provided to CW-1. SHNEWER instructed CW-1 to review the DVD alone. CW-1 provided the DVD to FBI and JTTF agents who reviewed the DVD. The DVD contains video footage of various jihadist images while a narrator recruits the observer to the jihadist movement.

6. On or about May 26, 2006, during a consensually recorded meeting with CW-1, MOHAMAD SHNEWER gave CW-1 SHNEWER's laptop computer and told CW-1 to review particular DVD files on the laptop hard drive. CW-1 asked SHNEWER to write the names of the DVD files SHNEWER wanted CW-1 to review, which SHNEWER did. CW-1 provided a business card to FBI and JTTF agents on which SHNEWER had written the names of the DVD files CW-1 was to review. One file was named "19" and the other file was named "VTS_01_1." Law enforcement officials made a copy of SHNEWER's laptop hard drive and were able to locate and view the files labeled "19" and "VTS_01_1." The file labeled "19" contained what appears to be the last will and testament of at least two of the hijackers involved in the terrorist attacks on the United

when federal charges were filed and at least two individuals pled guilty and admitted the conduct CW-1 had reported to the FBI. CW-1 has had one instance of not fully reporting truthful information. In January 2006, CW-1 self-reported to his/her handler that he/she mis-stated the identity of a friend with whom he/she had contact in an effort to protect that individual. CW-1 was informed by the handling agent that all information must be fully and completely reported. Since this incident, no new derogatory information concerning CW-1 has been reported. In this case, the FBI has been able to independently corroborate the information provided by CW-1 through consensual recordings and surveillance operations.



States on September 11, 2001.³ The file labeled "VTS_01_1" contained images of Osama Bin Laden and other Islamic extremists making various speeches in which the speakers call the viewer to join the jihadist movement.

7. On or about July 7, 2006, a second individual who was cooperating with the FBI ("CW-2")⁴ was approached by six males who were unknown to CW-2. One of the males identified himself as "Sulayman" and invited CW-2 to his home. The investigation has revealed that ELJVIR DUKA uses the name "Sulayman."

8. On or about July 28, 2006, CW-1 consensually recorded a meeting with SERDAR TATAR during which TATAR asked CW-1 to fix TATAR's vehicle. CW-1 and TATAR then switched vehicles. CW-1 delivered TATAR's vehicle to law enforcement officers. CW-1 consented to a search of the vehicle. Inside the vehicle, law enforcement officers found a 50-round box of 9 millimeter ammunition. On the same day, CW-2 consensually recorded a meeting with DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA. ELJVIR DUKA told CW-2 that the DUKAs go target shooting with firearms but cannot go to regular gun ranges because none of them are legal residents of the United States. DRITAN DUKA showed CW-2 a video on DRITAN DUKA's cell phone which depicted individuals shooting firearms. DRITAN DUKA stated that this activity took place in Pennsylvania. CW-2 informed law enforcement agents that during the meeting, CW-2 learned that the DUKA brothers keep their firearms with ELJVIR DUKA's brother-in-law, an individual named "Agim," and an individual named "Mohamad." Law enforcement officials have determined that ELJVIR DUKA's brother-in-law is MOHAMAD SHNEWER and that the individual named "Agim" is AGRON ABDULLAHU.

9. On or about July 29, 2006, CW-2 consensually recorded a meeting with MOHAMAD SHNEWER, DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA. During the meeting, SHNEWER showed CW-2 a number of videos on SHNEWER's laptop computer which depicted armed attacks on and the killing of United States military personnel. CW-2 observed

³ It should be noted that 19 members of Al Q'aeda were involved in the September 11, 2001 terrorist attacks.

⁴ CW-2, a paid informant, has previously proven to be credible and reliable, as evidenced by, among other things, law enforcement officers' corroboration of information previously provided by CW-2. During this investigation, CW-2 consensually recorded meetings and telephone calls with the conspirators.



that SHNEWER seemed to enjoy watching the video and smiled during the viewing.

10. On or about August 1, 2, and 5, 2006, CW-1 consensually recorded meetings with MOHAMAD SHNEWER. In summary, SHNEWER stated that he, SERDAR TATAR, DRITAN DUKA, ELJVIR DUKA, SHAIN DUKA, and others were part of a group that was planning to attack a U.S. military base. SHNEWER specifically named the United States Army base at Fort Dix, New Jersey and a nearby United States Navy base. SHNEWER explained that they could utilize six or seven jihadists to attack and kill at least one hundred soldiers by using rocket-propelled grenades ("RPGs") or other weapons. SHNEWER further explained that they could train for the attack in Pennsylvania. SHNEWER also said that he and others in the group had saved money to pay for the weapons and that they were not afraid to die. SHNEWER further stated that TATAR could obtain maps of Fort Dix in order to plan the attack. SHNEWER also said that the group wanted CW-1 to help lead the attack based on CW-1's prior experience in the Egyptian military.

11. On August 1, 2006, MOHAMAD SHNEWER said the following, in substance and in part:

"If you want to do anything here, there is Fort Dix and I don't want to exaggerate, and I assure you that you can hit an American base very easily."

"You take a map and draw it and then you calculate that there are areas where there are 100 - 200 individuals and you should allocate 6 -7 persons for this alone."

"When you go to a military base, you need mortars and RPGs."

". . . I am at your services as you have more experience than me in military bases and in life."

12. On August 2, 2006, MOHAMAD SHNEWER said the following, in substance and in part:

"There is a nice area where we can train . . . In Pennsylvania . . . It is two hours away from here."

"Don't worry about money. I have money too as I have been saving money for this plan for some time."

"Both Sulayman and Tony [meaning ELJVIR DUKA and DRITAN DUKA] have a lot of money."



In response to how the group would get a map of Fort Dix, SHNEWER said the following:

"Serdar, he used to deliver there . . . Why did I chose Fort Dix? Because I know that Serdar knows it like the palm of his hand."⁵

13. On August 5, 2006, MOHAMAD SHNEWER said the following, in substance and in part:

(In response to CW-1's question regarding who SHNEWER had in mind for the attack) "I have in mind Tony [meaning DRITAN DUKA], Sulayman [meaning ELJVIR DUKA], Shaheen [meaning SHAIN DUKA] . . . Serdar, definitely, he is the first one amongst us . . ."

(Concerning training) "You are in the mountains in the Poconos . . . In Pennsylvania. It is about two hours away from here. We went there for a week walking in the mountains and shooting in the open shooting range."

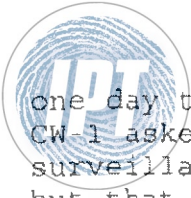
"We need to accumulate experience, and we need to think about how many we need and what they are going to do and we need to gather the weapons . . . Of course, I can get the weapons, machine gun, hand gun, I can get . . . from the street as you cannot buy a machine gun from a store."

(In response to whether SHNEWER had spoken with ELJVIR DUKA or DRITAN DUKA about being part of the group) "I spoke with them some time ago, and they are ready."

"All the names I mentioned are ready and on alert, specifically the four brothers and Serdar, that means Tony, Sulayman . . ."

14. During the consensually recorded meeting on August 5, 2006, MOHAMAD SHNEWER also suggested that he and CW-1 surveil military bases to decide which one to attack. When discussing the naval base, SHNEWER said, "Maybe it is easy to hit them, there are nights where the squad is out and doing exercises without weapons . . . the only problem is that they may have protection and scouts watching. You know what we can do is go

⁵ Subsequent consensually recorded conversations revealed that SERDAR TATAR used to deliver pizzas to Fort Dix. Law enforcement officers have verified that TATAR's family owns a pizzeria near Fort Dix.



one day to a nearby restaurant and observe the whole base." When CW-1 asked whether they could take pictures during their surveillance, SHNEWER said that doing so would be very dangerous but that they could film the base using a cell phone camera:

"Same thing for Fort Dix, you cannot take pictures as it is very difficult to do so. You know what, we can take pictures by using the phone and you make as if you are talking on the cell phone and you will take a video . . . In Fort Dix, yeah, while you are driving, we will drive slow and what is nice with the phone is that if you are stopped by a police, you will delete it from memory."

15. On or about August 11, 2006, CW-1 and MOHAMAD SHNEWER traveled to the Fort Dix military base to conduct surveillance. CW-1 consensually recorded the trip. While SHNEWER and CW-1 were driving to Fort Dix, SHNEWER spoke with another person on the telephone - captured on the consensually monitored recording - during which SHNEWER asked the individual what street the person's pizzeria was on. SHNEWER also said that SHNEWER, ELJVIR DUKA, DRITAN DUKA, SHAIN DUKA, SERDAR TATAR and CW-1 were part of the group that would attack the military base. When CW-1 asked what made SHNEWER think of Fort Dix as a target, SHNEWER replied, "My intent is to hit a heavy concentration of soldiers . . ." As SHNEWER and CW-1 drove into a specific area at Fort Dix, SHNEWER said, ". . . this is exactly what we are looking for. You hit 4, 5, or 6 humvees and light the whole place [up] and retreat completely without any losses." SHNEWER and CW-1 then drove to Lakehurst Naval Air Station. On the way there, SHNEWER remarked that "this is going to be easier to hit specially if you have 8 or 9 shooting with machine guns and they are good shooters." During the surveillance trip, SHNEWER received several telephone calls and lied about his whereabouts to the callers.

16. After MOHAMAD SHNEWER and CW-1 completed the surveillance trip, law enforcement officers observed SHNEWER later that evening drive by himself to the United States Army base at Fort Monmouth, New Jersey.

17. On or about August 13, 2006, during the evening hours, MOHAMAD SHNEWER called CW-1. CW-1 recorded the conversation. During the conversation, SHNEWER asked CW-1 to go with him to surveil the Dover Air Force base in Dover, Delaware. CW-1 then met SHNEWER and recorded their trip to the Dover Air Force Base. During the trip, SHNEWER played a video on his computer which taught the viewer how to make a grenade. SHNEWER said that "Sulayman [ELJVIR DUKA]. . . told me that they have high security



over there. You can see the planes taking off. Sometimes, there are 300 soldiers." SHNEWER also explained that he had informed ELJVIR DUKA that he had gone to surveil Fort Dix. SHNEWER further said that ELJVIR DUKA could get machine guns. SHNEWER acknowledged that "in all of the U.S. it's illegal to sell machine guns." Once SHNEWER and CW-1 arrived at Dover Air Force Base, SHNEWER surveilled the perimeter fence and other security features and agreed with ELJVIR DUKA's assessment that the base was too difficult of a target because of its high security.

18. After leaving Dover Air Force Base, MOHAMAD SHNEWER directed CW-1 to Philadelphia. On the way, SHNEWER again acknowledged that the conspirators consisted of himself, ELJVIR DUKA, SHAIN DUKA, DRITAN DUKA, SERDAR TATAR, and CW-1. SHNEWER also said that the sniper from Kosovo was a member of the group.⁶ SHNEWER also told CW-1 about the trip to the Poconos that the members of the group had taken in January 2006. SHNEWER played a video for CW-1 on SHNEWER's laptop computer and remarked, "This is Shain firing," and "This is Serdar - do you see him?" Once SHNEWER and CW-1 were in the Philadelphia area, SHNEWER directed CW-1 to drive past the United States Coast Guard building on Delaware Avenue in Philadelphia.

19. On or about August 18, 2006, CW-2 consensually recorded a meeting with DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA. DRITAN DUKA told CW-2 that he had a .357 firearm and was in search of two or three AK-47 Kalishnikov fully-automatic machine guns. DRITAN DUKA acknowledged that fully-automatic machine guns are illegal in the United States and therefore they would have to buy them "from the streets." DRITAN DUKA further cautioned that they could not speak about such firearms over the telephone. ELJVIR DUKA also said that they could purchase a revolver on the streets for \$400. During the consensually recorded meeting, SHAIN DUKA showed CW-2 an additional video from his cell phone that depicted 12 - 13 males shooting firearms in Pennsylvania. DRITAN DUKA explained that the location in Pennsylvania is about 2 ½ hours away and that they had spent a week in the Poconos.

20. On or about August 20, 2006, during a consensually recorded meeting, MOHAMAD SHNEWER informed CW-1 that he told SHAIN DUKA about the surveillance of Fort Dix. SHNEWER also discussed planning the attack on Fort Dix and acquiring machine guns.

⁶ Subsequent consensually recorded conversations have revealed that the conspirators believe AGRON ABDULLAHU was a sniper in Kosovo.



21. On or about August 21, 2006, during a consensually recorded meeting, MOHAMAD SHNEWER informed CW-1 that he told ELJVIR DUKA about the surveillance of Dover Air Force Base. SHNEWER also discussed acquiring RPGs and machine guns.

22. On or about September 14, 2006, CW-1 consensually recorded a meeting with MOHAMAD SHNEWER and SHAIN DUKA. During this meeting, CW-1 asked SHAIN DUKA to have ELJVIR DUKA call CW-1. SHNEWER explained to SHAIN DUKA, "We've been brain-storming, we were going to look at some areas . . . we got one, one idea for something and we wanted to know who's in, who's not." SHAIN DUKA responded, "Alright." CW-1 then mentioned machine guns and SHAIN DUKA responded, "Ah." When CW-1 mentioned that they could go to jail forever, SHAIN DUKA responded, "Gotta be cautious." When CW-1 asked if SHAIN DUKA was "with them," SHAIN DUKA responded, "God willing, we will see."

23. On or about September 22, 2006 and September 29, 2006, CW-1 consensually recorded two meetings with ELJVIR DUKA. In summary, ELJVIR DUKA stated that they would need to receive a "fatwa" before they could attack.⁷

24. On or about October 6, 2006, CW-2 attempted to consensually record a meeting with DRITAN DUKA, SHAIN DUKA, and MOHAMAD SHNEWER. The equipment, however, failed to record the meeting. CW-2 has informed law enforcement officers that during the meeting, SHNEWER told CW-2 that he had new videos for CW-2 to watch, one of which included training conducted by the attackers on September 11, 2001. CW-2 also informed law enforcement officers that SHAIN DUKA mentioned planning a trip to the Poconos for a week so that the group could shoot firearms.

25. On or about October 31, 2006, CW-1 consensually recorded a meeting with SERDAR TATAR during which CW-1 and TATAR discussed Fort Dix. When CW-1 expressed anger at the United States, TATAR stated in response, "You want to make them pay for something that they did . . . Okay, you need maps?" TATAR then

⁷ A "fatwa" in the Islamic faith is a ruling on Islamic law issued by an Islamic scholar. The term fatwa is used by Islamic extremists to mean "permission" to do a certain act that might otherwise be illegal under Islamic law. For example, Osama Bin Laden in 1998 purportedly sought and obtained a "fatwa" to attack the United States. The term fatwa as used by ELJVIR DUKA would therefore appear to mean a ruling that would permit an attack on the United States.



told CW-1 that he would give CW-1 a map of Fort Dix.

26. On or about November 3, 2006, during a consensually recorded meeting, MOHAMAD SHNEWER and CW-1 discussed SERDAR TATAR providing a map of Fort Dix. SHNEWER also said that individuals who were likely to attend another trip to the Poconos included DRITAN DUKA, ELJVIR DUKA, SHAIN DUKA, SERDAR TATAR, and AGRON ABDULLAHU. When CW-1 mentioned that CW-1 might have a source who could supply firearms, SHNEWER expressed interest.

27. On or about November 9, 2006, CW-1 consensually recorded a telephone conversation with SERDAR TATAR during which TATAR indicated that he would provide the map of Fort Dix to CW-1 shortly.

28. On or about November 12, 2006, CW-1 consensually recorded a meeting with SERDAR TATAR during which TATAR explained that he would acquire the map of Fort Dix from his father's restaurant. TATAR acknowledged that he was "in" the plan to attack Fort Dix stating, "I'm in, honestly I'm in." However, TATAR cautioned CW-1 that they, the group, needed to ensure that their families would be protected. TATAR described a place at Fort Dix they could target that would cause a power outage and allow for an easier attack on the military personnel there. At the very end of the meeting, TATAR questioned CW-1 about whether CW-1 was a "Fed" - meaning a law enforcement officer.

29. On or about November 13, 2006, CW-1 consensually recorded a telephone call with MOHAMAD SHNEWER. Toward the end of the call, SHNEWER said that he was coming to CW-1's residence. CW-1 then consensually recorded that meeting. During the meeting, SHNEWER and CW-1 discussed SERDAR TATAR acquiring the map of Fort Dix, machine guns, and the up-coming trip to the Poconos where the group would train. SHNEWER also told CW-1 that he hid his firearms inside the air conditioning unit at his house. SHNEWER reiterated that SHAIN DUKA and DRITAN DUKA knew of the plan and would be participating.

30. On or about November 14, 2006, CW-1 consensually recorded a meeting with ELJVIR DUKA during which CW-1 and ELJVIR DUKA discussed SERDAR TATAR potentially acquiring a map of Fort Dix. When CW-1 repeated TATAR's concerns about the need to take care of family before the attacks, ELJVIR DUKA responded that "Allah" will take care of TATAR's family. CW-1 and ELJVIR DUKA also discussed the need to use coded language when discussing the up-coming trip to the Poconos.

31. In a possible effort to determine whether CW-1 was a



law enforcement officer, SERDAR TATAR on November 15, 2006 contacted a sergeant with the Philadelphia Police Department and stated that he had been approached by an individual who had pressured him to acquire maps of Fort Dix. TATAR also told the police officer that he did not supply the map and was fearful that the incident was terrorist-related. The sergeant telephoned the FBI in TATAR's presence.

32. The next day, on November 16, 2006, SERDAR TATAR told CW-1 during a consensually monitored telephone call that SERDAR TATAR would supply CW-1 with the map of Fort Dix.

33. On or about November 27, 2006, CW-1 consensually recorded a telephone call with SERDAR TATAR during which TATAR said that too many people were in the restaurant for TATAR to take the map of Fort Dix.

34. On or about November 28, 2006, CW-1 consensually recorded a meeting with SERDAR TATAR. During the meeting, TATAR acknowledged that if he were to provide the map of Fort Dix he could be deported. TATAR also expressed his willingness to participate by providing the map, even in the face of significant consequences:

"You know one thing that's scary too? . . . I don't know you that much . . . You know. I don't know whether you're FBI . . . or the, an agent, don't know."

"I'm gonna do it. Whether you are or not (FBI) I'm gonna do it. Know why? . . . It doesn't matter to me, whether I get locked up, arrested, or get taken away, it doesn't matter. Or I die, doesn't matter, I'm doing it in the name of Allah."

35. Later in the evening of November 28, 2006, SERDAR TATAR called CW-1 when CW-1 was not at home (a call, therefore, that was not recorded) and stated, in substance and in part, that TATAR had left a package for CW-1 at the guard shack outside of CW-1's residence. This call was unrecorded. CW-1 then called TATAR back from CW-1's residence while consensually recording the call. TATAR immediately asked CW-1, "You get it brother?" CW-1 then asked TATAR where TATAR had put the map. TATAR then described the location where he had hidden the map. After the call, CW-1 went to the location described by TATAR and found a map labeled "Cantonment Area Fort Dix, NJ."

36. On or about November 29, 2006, CW-1 turned the map SERDAR TATAR had provided over to law enforcement officers who



made copies of it and returned the original to CW-1. Law enforcement officers also reviewed CW-1's call log on CW-1's cell phone and observed that CW-1 had received a telephone call at 10:51 p.m. on November 28, 2006 from telephone number 856-520-4291 that lasted approximately two minutes. Law enforcement officers have determined that 856-520-4291 was SERDAR TATAR's cell phone number.

37. On or about November 30, 2006, during a consensually recorded telephone call, CW-1 informed MOHAMAD SHNEWER that SERDAR TATAR had provided the map of Fort Dix. SHNEWER stated that he would come see the map shortly.

38. On or about December 1, 2006, CW-2 consensually recorded a meeting with SHAIN DUKA, DRITAN DUKA, and ELJVIR DUKA during which the firearms needed for the up-coming trip to the Poconos were discussed. DRITAN DUKA said the group had a shotgun and a .357 magnum firearm which they had purchased on the black market. SHAIN DUKA explained that they hide this weapon. ELJVIR DUKA said they also had a small automatic weapon.

39. On or about December 7, 2006, law enforcement officers with the FBI interviewed SERDAR TATAR. TATAR provided his cell phone number as 856-520-4291 - the same number law enforcement officers had previously observed on the call log of CW-1's cell phone. TATAR falsely told the interviewing officers that he was not a part of the plot to attack Fort Dix and did not know any of the parties that may be involved. TATAR three times falsely denied that he had provided a map of Fort Dix to anyone.

40. On or about December 8, 2006, during a consensually recorded meeting, MOHAMAD SHNEWER confirmed that SERDAR TATAR had told SHNEWER that TATAR had given CW-1 the map of Fort Dix. SHNEWER also stated that they had missed an opportunity to attack United States military personnel during the Army-Navy football game that had been recently played in Philadelphia.

41. On or about December 27, 2006, CW-1 consensually recorded a telephone call with MOHAMAD SHNEWER during which SHNEWER informed CW-1 that the trip to the Poconos was scheduled for February 1, 2007. SHNEWER further stated that he would take the map of Fort Dix from CW-1.

42. On or about December 28, 2006, CW-1 consensually recorded a telephone call with SHAIN DUKA and ELJVIR DUKA. During the call, ELJVIR DUKA told CW-1 that the Pocono trip was scheduled for February 1, 2007 and that they had already rented a house.



43. On or about December 29, 2006, CW-1 consensually recorded a meeting with MOHAMAD SHNEWER during which SHNEWER reviewed the map of Fort Dix. SHNEWER took the map from CW-1 and placed it into his mother's car. Later, when ELJVIR DUKA joined the meeting, CW-1 discussed SERDAR TATAR providing the map of Fort Dix. After ELJVIR DUKA left the meeting, SHNEWER told CW-1 that ELJVIR DUKA had said that Fort Dix was a good target. SHNEWER also stated that he was setting money aside to buy a fully automatic machine gun from CW-1's source. SHNEWER acknowledged the illegality of such a weapon stating, "it is forbidden to use fully automatic," and that the penalty was imprisonment.

44. On or about January 5, 2007, CW-2 consensually recorded a meeting with ELJVIR DUKA and SERDAR TATAR during which ELJVIR DUKA discussed the up-coming Pocono trip and stated that it had been scheduled for February 1, 2007.

45. On or about January 7, 2007, during a consensually recorded telephone call with MOHAMAD SHNEWER, CW-1 expressed concern that SHNEWER's mother might find the map of Fort Dix that SHNEWER had earlier placed in his mother's car. SHNEWER replied that he had hidden the map.

46. On or about January 16, 2007, CW-1 consensually recorded a telephone call with MOHAMAD SHNEWER during which SHNEWER made arrangements with CW-1 to travel to the Poconos.

47. On or about January 19, 2007, CW-2 consensually recorded a meeting with ELJVIR DUKA, DRITAN DUKA, and SHAIN DUKA during which the Pocono trip and firearms were discussed. DRITAN DUKA explained that the group had four firearms. ELJVIR DUKA also said that they had a 9 millimeter handgun, an assault rifle, and a semi-automatic assault weapon. DRITAN DUKA explained that AGRON ABDULLAHU brought the rifle and ammunition to them because he had a license for the weapon. ELJVIR, SHAIN, and DRITAN DUKA all explained that they could not have firearms because they do not have "green cards." During the consensually recorded meeting, SHAIN DUKA identified the individuals who would be going to the Poconos, which included DRITAN DUKA, ELJVIR DUKA, SHAIN DUKA, CW-2, AGRON ABDULLAHU, SHNEWER, and CW-1. CW-2 was told that everyone would meet at DRITAN DUKA's house on January 31, 2007, sleep over, and then leave for the Poconos early the next morning.

48. Between January 31 and February 1, 2007, law enforcement officers conducted video and photographic surveillance of DRITAN DUKA's residence in Cherry Hill, New



Jersey. Law enforcement officers observed AGRON ABDULLAHU and DRITAN DUKA at separate times carrying dark colored rifle style bags into DRITAN DUKA's residence. CW-2 consensually recorded conversations at DRITAN DUKA's residence, during which DRITAN DUKA, SHAIN DUKA, and ELJVIR DUKA discussed and handled the firearms. The individuals were heard racking the action of the firearms. CW-2 subsequently informed law enforcement officers that CW-2 had observed two firearms on the floor by the fireplace in DRITAN DUKA's residence and had handled the weapons with DRITAN DUKA, ELJVIR DUKA, and SHAIN DUKA. CW-2 also subsequently reported that ABDULLAHU had brought two firearms to DRITAN DUKA's residence - a 9 millimeter handgun and a Yugoslavian semi-automatic rifle. Law enforcement officers observed SHAIN DUKA carrying a green rifle style softcase from DRITAN DUKA's residence to ABDULLAHU who loaded it into ABDULLAHU's vehicle. CW-2 reported that ABDULLAHU placed the two firearms he had brought into DRITAN DUKA's residence into his vehicle to transport to the Poconos along with a shotgun and a Beretta rifle that were also at DRITAN DUKA's residence. Law enforcement officers observed DRITAN DUKA, ELJVIR DUKA, SHAIN DUKA, AGRON ABDULLAHU, and others depart DRITAN DUKA's residence on February 1, 2007.

49. CW-2 traveled to 2717 Eagleview Drive, Gouldsboro, Pennsylvania on February 1, 2007 with SHAIN DUKA, ELJVIR DUKA, DRITAN DUKA, AGRON ABDULLAHU, and others - the location of the house the DUKA brothers rented for the Pocono trip.

50. On or about February 2, 2007, CW-1 consensually recorded a telephone call with MOHAMAD SHNEWER and the two made arrangements to travel to the Poconos two days later. On the same day, law enforcement officers conducted video surveillance at Pennsylvania State Game Land 127 - the same firearms range captured on the January 3, 2006 DVD described above - and observed DRITAN DUKA, SHAIN DUKA, and ELJVIR DUKA all firing weapons from various positions. Law enforcement officers subsequently learned that these individuals were using an SKS semi-automatic rifle, a Beretta Storm semi-automatic rifle, a Mossberg 12 gauge pump shotgun, and a 9 millimeter Beretta handgun. Law enforcement officers observed SHAIN DUKA directing all the participants as they were setting up their shooting stations. Law enforcement officers also observed AGRON ABDULLAHU teaching several individuals where to place the shotgun when firing it. Law enforcement officers observed DRITAN DUKA watching all the participants as they were shooting.

51. On or about February 3, 2007, a surveillance camera at the firing range again captured ELJVIR DUKA, SHAIN DUKA, DRITAN

