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Moreover, when Qamar purchased gift card codes for transmission to the Islamic State, he was an immature 26-year-old man-child, who still lived with his parents, and spent his time at video games. In contrast, when Young purchased gift card codes for transmission to ISIS, he was a 37-year old police officer with thirteen years of service.

While Qamar had no money or property, Young lived in a house that he owned, free and clear. While Qamar had no firearms, Young possessed in his home 21 firearms and over 18,000 rounds of ammunition.<sup>7</sup> Unlike Qamar, Young is skilled with firearms. As Khalil reported, Young offered to teach marksmanship to Amine El-Khalifi.<sup>8</sup>

Khalil reported that Young said that he would go "postal" with a bullet proof vest someday, but that, unlike Khalifi, Young would not say in advance what he planned to do. While Young might not say in advance what he planned to do, he often talked about attacks that he *could* do. Those attacks were far more sophisticated than anything thought up by Qamar.

As Khalil testified, Young said that someone with his skills could attack an FBI establishment. Young said that he knew the building where the Joint Terrorism Task Force was

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<sup>7</sup> Young also possessed in his home more than 60 knives, including some made of polymers that would not be detected by metal detectors.

<sup>8</sup> We have no evidence that Khalifi received such a lesson before his arrest in February 2012 for attempted to detonate himself in the U.S. Capitol Building on behalf of al-Qaeda

located. (Khalil). He said that, although he did not know its specific floor, he could find out.

(Khalil). He said that, if one person attacked the JTTF, it would be suicide, but that the FBI would be in trouble if there were more than one attacker. (Khalil). He said that a few well-trained people with guns could cause serious damage. (Khalil).

As Khalil testified, Young said that he would tie to a cinder block and dump in Lake Braddock anyone who betrayed him. Young also described a plan by which he could use his police credentials to smuggle weapons past security at this very courthouse, in order to free a Muslim prisoner.<sup>9</sup> The plan was to smuggle the weapons into the building, and then hand them to others inside the building who had already passed through security. (Khalil).

Young told Khalil that he was angry at the FBI for the way that they approached him after Chesser's arrest, and told Khalil of a plan to kidnap and sexually torture the FBI agent involved. Young told Khalil that he researched the FBI agent; in fact, a search of his computer in 2011 found that he downloaded her photo onto his computer. GX 12-28; GX 12-29; GX 14-110.

As Khalil testified, Young pointed his AK-47 rifle out the window of his house to look for surveillance, and said that he would point a shotgun through the hole in his door after he removed his door knob. As Menzies testified, Young placed upon his kitchen table a large gun mounted on a tripod, and pointed it at the townhouses behind theirs. As Khalil testified, Young said that if the FBI came to his house, "that's what assault rifles, ballistic vests, & amphetamines are for."

Unlike Qamar, Young routinely engaged in sophisticated measures to thwart law enforcement. When his house was searched in August 2016, Young had a "bug detector" and at least 20 cell phones. GX 10-620; GX 10-650. Young used "burner" phones to thwart FBI

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<sup>9</sup> At trial, the object was described simply as "a federal building."













