

UNITED STATES DISTRICT COURT

for the District of Arizona

ORIGINAL

DOA 11/30/12

United States of America )
v. )
Abdullatif Ali Aldosary )
Defendant )

Case No. 12-7662 m

CRIMINAL COMPLAINT

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

On or about the date of 11/30/12 in the county of Pinal in the District of Arizona, the defendant violated 18 U. S. C. § 844(f)(1) & (2), and 922(g) & 924(a)(2), an offense described as follows: See Attachment A

This criminal complaint is based on these facts:

See Attachment B

Continued on the attached sheet.

DAVID PUMSNER 12/1/12
AUSA APPROVAL

Complainant's signature

Carey A. Cooper, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: December 1, 2012

Judge's signature

City and state: Phoenix, Arizona

Bridget S. Bade, U.S. Magistrate Judge
Printed name and title

**ATTACHMENT A**

**U.S. v. Abdullatif Aldosary**

**Count 1**

On or about November 30, 2012, in the District of Arizona, the defendant, ABDULLATIF ALI ALDOSARY, maliciously damaged, destroyed and attempted to damage and destroy a building, located at 501 N. Marshall Street, Casa Grande, Arizona, in whole and in part leased to the United States Social Security Administration, an agency of the United States by means of fire and explosives.

All in violation of Title 18, United States Code, Section 844(f)(1) and (2).

**Count 2**

On or about November 30, 2012, in the District of Arizona, the defendant, ABDULLATIF ALI ALDOSARY, having been convicted of a crime punishable by imprisonment for a term exceeding one year, that is Aggravated Harassment, a Class 6 Felony in the Maricopa County Superior Court; Case No. CR2007-177202, did knowingly possess in and affecting commerce, a firearm, which is a Saiga 7.62 caliber rifle, serial number H06602005.

In violation of Title 18, United States Code, Sections 922(g) and 924(a)(2).

**ATTACHMENT B**

**AFFIDAVIT OF PROBABLE CAUSE**

Your Affiant, Carey A. Cooper, being duly sworn, deposes and says to wit:

I, Carey A. Cooper , having been first duly sworn, do hereby depose and state as follows:

I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and am currently assigned to the Phoenix Division FBI Joint Terrorism Task Force (JTTF). I have been employed in such capacity since August 2009. During my career with the FBI, I have investigated numerous criminal violations of federal statutes. I have also received specialized training in the area of terrorism related investigations. As an FBI Agent, your Affiant is authorized to investigate violations of federal law, and execute warrants issued under the authority of the United States.

The statement of facts contained in this affidavit come from my personal observations, my training and experience, and information obtained from other Agents, local law enforcement, and witnesses. I have set forth only the facts necessary to establish probable cause in an investigation involving Title 18, United States Code (USC), Section 844(f)(1) and (2) and Title 18 USC, Sections 922(g)(1) and 924(a)(2).

On November 30, 2012 at approximately 0821 hours, an unknown explosive device was detonated at the rear entrance of the United States Social Security Administration (hereinafter USSSA) building, located at 501 N. Marshall Street, Casa Grande, Arizona. This building is stand-alone entity which is wholly leased to the USSSA, which is a United States Federal Agency.

On November 30, 2012, at approximately 0821 hours, Casa Grande Police Officer Espino

was travelling northbound on Florence Street when he heard an explosion come from the vicinity of the USSSA building. As Officer Espino was turning into the USSSA building, via the alleyway, he observed a blue or dark blue compact car exiting the alleyway of the building.

Several witnesses were identified and interviewed, revealing the following information: An interview of Eyewitness number one, hereinafter referred to as W1, revealed the following: W1 heard an explosion, then observed a dark colored car leaving the rear parking lot of the USSSA building at a high rate of speed. The aforementioned vehicle was driven by a male who W1 described as being "tan skinned," and possibly of Hispanic decent. W1 further described the male as being in his late 20's or 30's, with short hair, and an unshaven face.

An interview of Eyewitness number 2, hereinafter referred to as W2, revealed the following: W2 observed a black or dark blue car arrive in the parking lot of the USSSA building, and then parked behind the building. W2 reportedly heard a loud explosion, and observed the aforementioned vehicle leave the parking lot at a high rate of speed. As the vehicle drove past W2, W2 observed driver, who was the only occupant in the vehicle. W2 was able to obtain the license plate for the vehicle and identified it as Arizona license plate 794-MDH. W2 described the driver as a male in his mid-30's, with Hispanic features, scruffy facial hair. The male was reportedly wearing a black hooded sweatshirt.

A USSSA employee, hereinafter referred to as W3, observed a small black vehicle pull into the parking lot and park on the northwest corner of the USSSA building. W3 heard an explosion and subsequently observed the aforementioned vehicle backing out of a parking space. W3 reported that the car was on fire, with flames emitting from the front of the vehicle as it drove out of the USSSA parking lot.

Several other USSSA employees were interviewed and corroborated the above statements relating to the vehicle, subject and events.

A query of the Arizona Department of Transportation-Motor Vehicle Division (hereinafter AZDOT-MVD), revealed the following listing for Arizona license plate 794-MDH:

Registered owner:

Abdullatif Aldosary

DOB: XX/XX/1965

Arizona Driver's License Number: DXXXXX573

SSN: XXX-XX-6766

Vehicle information:

Black 2003 Hyundai Elantra - 4-door sedan

XXXX West Lemon Avenue

Coolidge, Arizona 85128

VIN: XXXXXXXXXXXXX606320

A query of the AZDOT-MVD, revealed the following information for Aldosary's driver's license:

Arizona Driver's License Number: DXXX573

DOB: XX/XX/1965

SSN: XXX-XX-6766

XXXX Lemon Avenue

Coolidge, Arizona 85128

HEIGHT: 5'10"

WEIGHT: 160

HAIR: BLACK

EYES: GREEN

An on-line query of the Pinal County Assessor's website for XXXX West Lemon Avenue revealed that the primary owner is Abullatif A. Aldosary. The residence was purchased on August 12, 2008 for \$95,990.00. There are no other names associated with this residence per the Assessor's website.

On November 30, 2012, at approximately 0910 hours, Officers from the Coolidge Police Department responded to XXXX West Lemon Avenue. Upon arriving at this address, the Officers observed a man fitting the description of Aldosary in the driveway of the residence. The man was observed washing the vehicle bearing Arizona license plate number 794-MDH. The vehicle matched the description provided by witnesses at the scene of the explosion. In addition, the vehicle parked in the driveway matched the vehicle description provided in AZDOT-MVD's records. The male matching the description of Aldosary was wearing a black short sleeved t-shirt, with an emblem on the left breast which read "Titan Poker" and "www.Titan Poker.com." The male was taken into custody and transported to the Coolidge Police Department. The male was subsequently identified as Aldosary.

On November 30, 2012, FBI Special Agent Bomb Technician (hereinafter SABT) Bruce Applin arrived at the subject residence and examined the front of Aldosary's vehicle, the 2003 Hyundai bearing Arizona license plate 794-MDH. SABT Applin observed thermal damage to the vehicle, which was likely caused by explosive material.

Based upon your Affiant's training, knowledge and experience, your Affiant believes that

by washing the vehicle, Aldosary may have been attempting to destroy and/or conceal evidence of the crime.

On November 30, 2012, photographic line-up number 82398 was created. The line-up contained one photograph of Aldosary and five photographs of men similar in appearance to Aldosary. The photographic line-up was shown to W1 and W2, both of whom were unable to identify Aldosary from the other similar males.

Interviews were subsequently conducted with Aldosary's neighbors, who stated Aldosary is the only person they have ever seen occupying his residence and/or driving the 2003 Hyundai. Aldosary was described by his neighbors as a loner.

On November 30, 2012, United States Magistrate Judge Bridget S. Bade authorized a search warrant for the premises located at XXXX West Lemon Avenue, Coolidge, Arizona. The search warrant was executed by FBI Phoenix Division personnel.

Numerous items of evidentiary value were located within Aldosary's residence, to include the following:

- Numerous documents were found secreted behind a photograph hung on the wall in the study. Amongst these documents were several internet printouts describing materials and equipment needed to make RDX (cyclotrimethylenetrinitramine), homemade nitroglycerine, ammonium nitrate from homemade chemicals, how to make a bomb from homemade chemicals, and recipes from the Anarchists Chemical Cook Book. In addition, a piece of paper containing handwritten notes labeled "Materials Needed" was located with the aforementioned internet printouts. On the back of one of the documents were handwritten notes pertaining to mixing potassium nitrate with sugar and baking soda, then adding an organic

powdered dye. A sales receipt for the purchase of 2.5 liters of 70% nitric acid and dual scale thermometer from ChemLab Supply, 2810 South 24<sup>th</sup> Street, Phoenix, Arizona was also located within these documents. The sales receipt was dated 10/12/2012.

- Henna red hair dye, yellow egg dye, sugar, and baking soda were located in the kitchen cabinet adjacent to the stove. All items were located on the same shelf.
- Two pieces of paper with handwritten notes were located on the floor, behind a dresser in the master bedroom. The handwritten notes referred to “AN” and how to obtain “AN” from cold packs. Based on your Affiants training, knowledge and experience, she is aware that AN commonly refers to ammonium nitrate. According to SABB Jay Henze, cold packs were located within the subject residence. Based on your Affiants training and experience, ammonium nitrate is a common precursor used in the making of explosives.
- A 9mm Ruger semiautomatic handgun, serial number 33085513, and a Saiga 7.62 caliber rifle, serial number H06602005 were secreted in the attic of the residence. The entrance to the attic was located within the closet of the master bedroom.
- Also located within the residence were various types of ammunition as follows: 168 rounds of 9mm ammunition, 21 boxes of Tul 7.62 x 39 mm ammunition, each containing 20 rounds; 3 boxes of 50 round Winchester Wildcat .22 caliber rifle ammunition; 1 open box of .22 caliber ammunition; 1 box containing 50 rounds of Winchester 9mm ammunition; 2 boxes containing 50 rounds of Remington 9mm ammunition; 5 boxes containing 50 rounds of 9mm ammunition; 1 blue plastic case containing 13 rounds of 9mm Luger ammunition; 1 - 9mm Ruger magazine containing 17 rounds of ammunition; 1 – Ruger magazine containing 4 rounds of



9mm Luger ammunition; 1 Ruger 9mm round of ammunition. These items were concealed underneath the master bedroom nightstand. In addition, a Mossberg owner's manual for a .22 caliber rifle was located in the master bedroom. A Mossberg gun lock and a Ruger SR9 9mm owner's manual were also located in the master bedroom. Extended capacity rifle magazines with approximately 200 rounds of Russian made ball and hollow point ammunition were located within the residence.

- Also found within the residence were the following documents of indicia of ownership: a Bank of America account statement for the period of 08/21/2012-09/17/2012 in the name of Abdullatif Ali Aldosary, XXXX West Lemon Avenue, Coolidge, Arizona 85128-8276. The ending balance on 09/17/2012 was \$21,642.67. The document indicates this is a checking account. A 2012 property tax statement for XXXX West Lemon Avenue, Coolidge, Arizona, in Aldosary's name.
- The following chemicals were located within the residence: two (2) one (1) gallon containers of muriatic acid, nitric acid, 70% isopropyl alcohol, one (1) pound of smokeless powder, mace, and solid fuel cubes.
- A dark colored hoodie/sweatshirt, similar in description to witness accounts, was located in the washing machine.

According to research conducted on line, RDX is an explosive nitroamine widely used in military and industrial applications. It was developed as an explosive which was more powerful than TNT. RDX is also known as cyclonite, hexogen, and T4. Its chemical name is cyclotrimethylenetrinitramine. RDX is stable in storage and is considered one of the

most powerful of the military high explosives. RDX is believed to have been used in many bomb plots including terrorist plots.

Internet research relating to the handwritten notes detailing the use potassium nitrate, sugar, baking soda and organic powdered dye revealed this is a recipe for colored smoke bombs. Items consistent with the handwritten recipe found in the study, were located in the kitchen of the residence as described above.

Google Maps driving directions detailed the distance and time to travel from the USSSA to Aldosary's residence as being approximately 14 miles and 25 minutes driving time depending on route and traffic flow.

A query of Aldosary's criminal history revealed the following felony convictions/violations:

- 04/14/2008 – Aggravated Harassment – Felony – Maricopa Superior Court case number CR 2007-177202-001. Sentenced to 2 months jail time and 3 years of probation. Probation was revoked on 04/24/2009, at which time Aldosary was sentenced to one year in the Arizona Department of Corrections.
- 03/20/2009 – Violation of Court Order – Felony – Coolidge Police Department case number C0020096078.

An ATF Agent confirmed that the Saiga 7.62 caliber rifle was not manufactured in Arizona and would have traveled in interstate commerce.

A query of Arizona Department of Economic Security (hereinafter AZDES) by Aldosary's social security account number ending in 6766, revealed that Aldosary has no wages reported through AZDES.

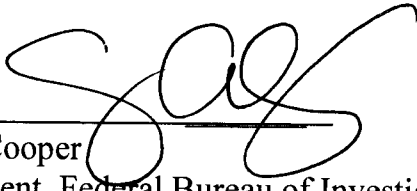
On November 30, 2012, Casa Grande Fire responded to the scene of the explosion and extinguished the ensuing fire at the USSSA building. Due to the explosion and ensuing fire, the USSSA building sustained the following damage:

- Impact and fire damage along the west wall of the structure near the northwest corner.
- Impact damage occurred to the stucco along the west wall of the building to the south of the door. The damage to stucco consisted of a portion of the wall being pushed in several inches as a result of an increase in pressure adjacent to the wall.
- The man sized door along the west wall near the northwest corner of the building suffered damage as well. An examination of the west wall indicated a substantial fire in the immediate area of the door. Damage to the door consisted of paint consumption as a result of exposure to a fire on the ground at the base of the door. The window in the door was also dislodged as a result of increased pressure in the area. This allowed fire to enter into the structure from outside.
- Heavy soot accumulation can be observed on the west wall of the structure in the area of the door. Heavy soot accumulation was present on the wall from the base of the wall to the top of the wall. The area of heavy soot accumulation was approximately ten feet in width.
- Damage occurred to a vehicle parked along the west wall of the building approximately ten feet south of the door. Damage to the paint on the north side of the vehicle resulted from the vehicle being exposed to heat from the fire near the door.
- Debris, much of it melted nylon and plastic, was scattered in the parking lot to the west of the building out to a distance of over one hundred feet.

**CONCLUSION**

Based on the above listed facts, your Affiant believes that probable cause exists that Abdullatif Ali Aldosary committed the crimes of Malicious Damage to Federal Property by Means of Fire and Explosives, in violation of Title 18, United States Code, Section 844(f)(1) and (2) and Title 18, United States Code Section, 922(g)(1).

Dated this 1st day of December, 2012.



Carey A. Cooper  
Special Agent, Federal Bureau of Investigation

Subscribed and sworn to and before me this 1<sup>st</sup> day of December, 2012.



Bridget S. Bade  
United States Magistrate Judge