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**UNITED STATES DISTRICT COURT**  
**District of Kansas**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**CASE NO. 15-40031-DDC**

**v.**

**ALEXANDER E. BLAIR,**

**Defendant.**

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**GOVERNMENT’S FACTUAL BASIS**

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COMES NOW the United States of America, by and through Anthony W. Mattivi and David C. Smith, Assistant United States Attorneys, and Josh Parecki and Rebecca Magnone, Trial Attorneys, DOJ Counterterrorism Section, and hereby provides the Court with a factual basis in support of the defendant’s guilty plea in this case. Although the defendant has filed his own factual basis for the offense, the government submits the defendant misrepresents two significant facts that the government is compelled to correct, and he omits other facts that support a finding of guilt in the case.

In March of 2014, the FBI began an investigation concerning online statements posted by John T. Booker, Jr., a/k/a “Mohammed Abdullah Hassan,” wherein Booker stated his intent to wage Jihad and die in the process. Beginning on October of 2014, Booker engaged with an individual who was, unbeknownst to Booker, an FBI Confidential Human Source (CHS 1).

Between on or about October 8, 2014, and continuing to on or about April 10, 2015, Booker communicated to CHS 1 his desire to join the Islamic State of Iraq and the Levant (ISIL). Booker was committed to carrying out an act of violence in support of Jihad and took steps to construct a vehicle borne improvised explosive device (VBIED), a destructive device, which he, along with CHS 1, would personally detonate on April 10, 2015 at the Fort Riley Military Installation, which is real property in whole or in part owned and possessed by, and leased to, the United States and departments and agencies thereof. Booker's preparations for the attack included renting a storage unit in Topeka, where components for the VBIED would be stored. Booker was arrested on April 10, 2015, as he completed final preparations for driving the VBIED onto Fort Riley.

During the investigation the FBI determined that Booker and the defendant, Alexander E. Blair, were associated and that Blair shared some of Booker's extremist views concerning Jihad against the United States military.<sup>1</sup> Agents learned that Blair loaned Booker money for the purpose of renting the storage unit mentioned above. Due to this association, agents contacted and interviewed Blair immediately after Booker's arrest on April 10, 2015.<sup>2</sup> During the interview, Blair admitted that he knew about Booker's plan to detonate the VBIED.

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<sup>1</sup> Defendant Blair has a condition known as Williams Syndrome, essentially a learning disability, which was recognized and diagnosed when the defendant was young, and for which he was provided accommodation throughout his education. The defendant graduated from high school, passed the Armed Forces Qualification Test, and enlisted in the military. He was later discharged from the military as a result of a medical condition unrelated to Williams Syndrome.

<sup>2</sup> Mr. Blair claims the agents told him that, "in order to save lives, it was imperative that Mr. Blair provide information about his knowledge of and interactions with Booker." In reality, it was Mr. Blair who told the agents that he needed to provide the information in order to save lives.

He further stated that he knew Booker believed he (Booker) was acting on behalf of ISIL; he knew Booker was gathering materials for constructing the VBIED; he knew Booker intended to deliver the device onto Fort Riley; and he knew Booker planned to kill as many soldiers as possible. Blair admitted to agents that he loaned money to Booker for rental of the storage unit, knowing that the unit would be used to store and construct the VBIED. Blair also advised agents that he urged Booker to cease talking openly about his intentions to conduct an attack for fear of attracting public attention and being reported to law enforcement. Blair told agents that he believed he had in fact been recently put under law enforcement surveillance. Blair told agents that he believed Booker would carry out the attack, but Blair chose not to alert authorities and report Booker's actions. Finally, when asked about the fact that Booker's plan would have resulted in the deaths of numerous American service members, Blair responded, "But again, that's what they signed [up] for."

Respectfully submitted,

THOMAS E. BEALL  
Acting United States Attorney

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#### CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of May, 2016, I electronically filed the foregoing pleading with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Chris Joseph  
Counsel for Defendant Blair

/s/ Anthony W. Mattivi

Anthony W. Mattivi