

FILED July 25, 2016  
(Date)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
U.S. MAGISTRATE JUDGE

for the  
Northern District of Florida

United States of America  
v.

Robert B. Jackson

*Defendant(s)*

Case No. 3:16mj143

CERTIFIED A TRUE COPY  
Jessica J. Lyublanovits

By: Jessica J. Lyublanovits  
Deputy Clerk

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(s) of June 3, 2015 in the county of Escambia in the Northern District of Florida,  
the defendant(s) violated:

*Code Section*  
18 U.S.C. Section 1001

*Offense Description*  
-False Statement to a Federal Law Enforcement Officer

This criminal complaint is based on these facts:  
See attached affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: July 25, 2016

City and state: Pensacola, Florida

Alex Nogueiras  
Complainant's signature

FBI Special Agent Alex Nogueiras  
*Printed name and title*

Elizabeth M. Timothy  
Judge's signature

U.S. Magistrate Judge Elizabeth M. Timothy  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
AN ARREST WARRANT**

I, Alex Nogueiras, Jr., being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an arrest warrant for Robert Blake Jackson.
2. I am a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, acting in my official capacity. As such, I am a law enforcement officer of the United States, and empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Section 1001 of Title 18, United States Code. I have been employed by the FBI for approximately eleven and a half years, with the past three and a half years as a Special Agent. During this time, I have attended training for, and conducted investigations into, violations of federal law. I am currently assigned to the FBI's Jacksonville Division Pensacola Resident Agency and am responsible for investigating Terrorism and Weapons of Mass Destruction matters. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers, FBI employees, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that a violation of Section 1001 of Title 18, United States Code, has been committed by Robert Blake Jackson.

## **BACKGROUND - ISLAMIC STATE OF IRAQ AND THE LEVANT**

4. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq ("AQI") as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act 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.<sup>1</sup>

## **SUMMARY OF ALLEGATIONS**

5. Investigation to date has revealed that during an interview with FBI agents, Robert Blake Jackson made material false statements to the interviewing agents, in violation of Section 1001 of Title 18, United States Code. Prior to said false statements, Jackson was admonished by interviewing agents as to the existence of Section 1001 of Title 18, United States Code, and its meaning.

## **PROBABLE CAUSE**

6. On or about October 3, 2014, the FBI's San Diego Division conducted an open source review of the Facebook profile 'Abdur Rashid Bin Jackson' (Facebook ID 100008289079159), which was identified as posting comments expressing support for extremist

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<sup>1</sup> 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 and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq ("AQI") as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act 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 ("ISIS"), the Islamic State of Iraq and Syria ("ISIS"), 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 ISIL listing: Islamic State, ISIL, and ISIS. Although the group has never called itself "Al-Qaeda in Iraq (AQI)," this name has frequently been used to describe it through its history. To date, ISIL remains a designated FTO.

terrorist groups and stating a desire to assist the Islamic State of Iraq and the Levant (ISIS or ISIL). During the review, it was observed that on the morning of September 19, 2014, the user of 'Abdur Rashid Bin Jackson' posted a picture of the ISIL flag. Another Facebook user posted the question "Are you isis?" to which 'Abdur Rashid Bin Jackson' replied "...I am not ISIS, though I wish I could help." Also observed on the 'Abdur Rashid Bin Jackson' "likes" page were the groups 'Islamic State of Iraq and the Levant' and 'Al-Shabaab.' ISIL and Al-Shabaab are designated as Foreign Terrorist Organizations by the United States Department of State. On the evening of September 19, 2014, an unidentified Facebook profile sent Jackson a link to the video "Flames of War," an ISIL recruitment video, which was publicly displayed on Jackson's Facebook wall. Also posted to the account were personal photographs and information revealing that the profile user had a location of Pensacola, Florida (FL). Subsequent investigation of public Facebook photographs and open source records showed the photographs matched Robert Blake Jackson, a resident of Pensacola, FL.

7. On or about January 29, 2015, a telemarketing business located in Pensacola, Florida, reported they recently fired an employee named Robert Blake Jackson for viewing ISIL related and other terrorist related websites and videos on his work computer, which was a violation of company policies. Other employees, including those who sat in close proximity to Jackson, observed that Jackson spent a majority of his time at work searching for topics relating to terrorism and extremist groups. One employee stated "everything he (Jackson) viewed was on ISIS," and that he also showed a particular interest in any news and video regarding ISIL actions with the Japanese prisoners they captured. The telemarketing business provided a detailed list of internet searches performed by Jackson. Topics searched included 'ISIS news,' 'al Qaeda news,' 'abu musab al-zarqawi,' 'charlie hebdo,' 'terrorism news,' 'most inspiring anwar al awlaki

lecture,' and 'anwar al awlaki lectures on youtube.' Employees also observed Jackson signing into and utilizing the Facebook profile 'Abdur Rashid Bin Jackson.' Moreover, FBI computer analysts later confirmed certain electronic searches pursuant to a forensic review.

8. On June 3, 2015, Robert Blake Jackson was interviewed by FBI agents in Pensacola, FL. During the interview, while describing his personal background, Jackson stated he uses the alias 'Abdur Rashid.' Further, Jackson explained he uses the alias in electronic communications, and he provided an email address of xxxxxxxxxxxx8585@gmail.com to the interviewing agent. At this point in the interview, Jackson was admonished regarding Section 1001 of Title 18, United States Code, and was advised it is illegal to provide false information to federal agents. Jackson was then asked what content he posts on Facebook, and he replied he has made posts regarding the Koran and the book "Milestones" by Sayyid Qutb. Jackson was asked if he posted anything regarding violent extremism or radical groups, and Jackson stated he posted a picture of a black and white flag, but "not the ISIS flag." Jackson specifically stated he never posted anything pro-ISIS, that he is not pro-ISIS, and that he made no online comments espousing anything violent.<sup>2</sup>

9. During the aforementioned June 3, 2015, interview by agents, Jackson also stated that while he was employed at the above telemarketing business, he utilized the internet to only search news sites (e.g. Al-Jazeera), and nothing else. This is directly contradicted by witness accounts (see paragraph 7 above) as well as forensic evidence. That is, a forensic review of

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<sup>2</sup> Jackson also stated that he does not use his Facebook account often. Pursuant to results produced by Facebook in response to a federal search warrant, see paragraphs 13-16 herein, your affiant know this to be false in that Jackson posted to his Facebook accounts many dozens of times in 2014-2015. Said postings even included, among other things, between September and December 2014, Jackson adding the Islamic State of Iraq and the Levant as well as Al-Shabaab to his "likes" or "inspirational" people on Facebook.

Jackson's use of the telemarketing business's digital media confirmed he accessed multiple sites and Youtube videos involving ISIL related and terrorism related material.

10. Sometime before the June 3, 2015, interview, Jackson's Facebook profile was deactivated involuntarily, but upon said interview he stated that he did not receive an explanation from Facebook regarding the deactivation. When questioned regarding the deactivated Facebook profile, Jackson surmised it was deactivated because he had many Facebook friends who were from the Middle East, but again reiterated that he made no comments espousing violence or extremism. Jackson advised the interviewing agent that he had created a new Facebook profile to replace the deactivated profile. As shown in paragraph 14 below, Jackson's explanation and statements about the deactivation of his Facebook account are directly contradicted by what the FBI learned pursuant to a response to a subsequently issued search warrant upon Facebook.

11. On July 17, 2015, the FBI's Jacksonville Division conducted an open source review of Facebook and found a new profile bearing the name 'Abdurashid Al Amriki' (Facebook ID 100009452466992), which displayed a photograph of Jackson as the profile picture and a comment posted on April 22, 2015, stating "...I've returned to Facebook. Insha'alla I will not have this one compromised for reasons inexplicable." Based upon your affiant's training and experience, and knowledge that this more recent Facebook profile was set to be private, it is believed that Jackson appeared to be taking steps to protect against infiltration of his new Facebook account in that he acknowledged a fear of being "compromised."

12. On or about September 17, 2015, the Pensacola Police Department (PPD) affected a traffic stop on Robert Blake Jackson. The traffic stop was initiated after local residents called the police due to a suspicious person driving through a Pensacola neighborhood with what appeared to be a laptop protruding from the driver's vehicle window. Jackson was the driver of

the vehicle, and he informed PPD officers that he lives at XXXXXXXX Street, Pensacola, Florida. Your affiant knows the above noted behavior reflects what is referred to as “war driving.” This is an activity wherein a suspect roams through residential areas in an attempt to lock onto, and utilize, unsuspecting persons’ internet wireless fidelity. In this instance, based upon all the investigation information to date, your affiant believes this may have been undertaken by Jackson in an effort to use an Internet Protocol address that could not be linked back to him personally.

13. On September 29, 2015, a search warrant was authorized by United States Magistrate Judge Elizabeth M. Timothy and served on Facebook for records pertaining to Facebook accounts ‘Abdur Rashid Bin Jackson’ (Facebook ID 100008289079159) and ‘Abdurrashid Al Amriki’ (Facebook ID 100009452466992).

14. A review of the records provided by Facebook, which included content from the above referenced accounts, revealed that Jackson posted the following comments and items on his Facebook profile *before* he was interviewed by the FBI on June 3, 2015:

- a. On May 14, 2014, Jackson posted the comment “Alhamdulillah! May Allah (swt) bless these future lions of jihad, Inshallah!”
- b. On August 27, 2014, Jackson wrote to another Facebook user “..Akhi, I merely wanted to thank you for your valiant work against the vile and utterly evil yahudi scum. In shallah you sent as many jews as possible unto the maw of the hellfire....Alhamdulillah Hamas and the Qassam brigades do not bend unto the horrendous will of the jews- unlike Fatah.” This posting contradicts that which Jackson stated to FBI agents as noted in paragraph 8.
- c. On September 19, 2014, Jackson posted the below image:



Another Facebook user posted a comment to this image asking “Are you isis?” to which Jackson replied, “No akhi I am not ISIS, though I wish I could help.” Your affiant knows that the depicted flag is one utilized by ISIL. This posting contradicts that which Jackson stated to FBI agents as noted in paragraph 8.

- d. On November 10, 2014, Jackson commented on an image and wrote “Inshallah America and it’s coalition burns in the hellfire. May the Islamic State bury these idiots in Bilad al Sham. All of this infuriates me; however- it is prophecy that qiymah is near, yes??” This posting contradicts that which Jackson stated to FBI agents as noted in paragraph 8.
- e. On January 9, 2015, Jackson posted the below image of himself with the caption “Shaheed insha’allah...”



Based upon your affiant’s training and experience, individuals showing support of ISIL pose for photos with their hand closed and their index finger



pointing upward. Also, the term “Shaheed” is often used to refer to martyrs who perish committing jihad. This posting contradicts that which Jackson stated to FBI agents as noted in paragraph 8.

f. On March 16, 2015, a Facebook user sent a message to Jackson asking “Seruously hows work with u guys???its so hard to find.” Jackson replied on that same date “Been alright but yea...jobs suck. Wish I could just join ISIS..free housing, a stipend...food...It is NOT what the media says it is. And yea- Alison from Photography...going on almost ten years now.” (Alison is Jackson’s wife). This posting contradicts that which Jackson stated to FBI agents as noted in paragraph 8.

g. On April 2, 2015, Jackson contacted Facebook support using his email address xxxxxxxxxxxx8585@gmail.com and questioned why his Facebook account was deactivated. On April 8, 2015, Facebook replied to his inquiry and stated “We’ve reviewed your account and determined that it hasn’t followed the Facebook Statement of Rights and Responsibilities. The violation of these terms has resulted in the permanent loss of your account. One of our main priorities is the comfort and safety of the people who use Facebook, and we don’t allow credible threats to harm others, support for violent organizations or exceedingly graphic content on Facebook.”

15. Facebook records capturing the Internet Protocol (IP) addresses used to access the ‘Abdur Rashid Bin Jackson’ profile showed two IP addresses that were routinely used: 68.1.93.225 and 68.1.96.250, which were maintained by Cox Communications, a popular Internet Service Provider in the Pensacola region. A grand jury subpoena served on Cox

Communications showed the referenced IP addresses were assigned to the residence located at XXXXXXXX Avenue, Pensacola, Florida. During the aforementioned FBI interview on June 3, 2015, Jackson informed the interviewing agents his home address was XXXXXXXX Avenue, Pensacola, Florida, at that time.

16. Facebook records also showed that Jackson professed he traveled overseas. The following excerpts came from a Facebook message conversation between Jackson and the user of Facebook profile 'K.R.' on January 11, 2015:

RJ: whats up?

KR: Not much what about you?

RJ: Not bad; my "overseas"..'job"...assured that my family and I will be okay for awhile

RJ: I was gone 2012-march 2014

KR: What did you do overseas

RJ: teaching english and helping to raise funds

KR: Where

KR: And how did you manage that job

RJ: Listen I'm gonna download another IP blocker- and give me your email so that I can tell u about everything safely

17. On January 18, 2015, while again engaged in messages with 'K.R.,' Jackson wrote "No brother, we are financially stable for the most part. We do receive food stamps and Medicaid, so we were eligible for a free phone. Figured we might as well take advantage of it. When I returned from Syria early before the civil war really picked up, I was given a large sum of pay, and we receive a monthly stipend. My brothers took care of Alison and the kids while I

was gone. She and the children received a monthly stipend (thats when we began receiving it). The sheikh (basically a preacher of sorts) checked up on them every three days or so, and then provided up with a free 2006 Jeep Commander. Have it still; a badass.”

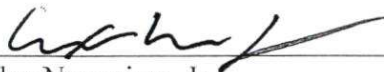
18. Queries of United States Department of State records seem to indicate that Robert Blake Jackson has never held a United States Passport and, therefore, would not be allowed to legally enter a majority of foreign countries, leading him to possibly have sought surreptitious means to travel outside of the country or to have been lying to ‘K.R.’

19. As previously stated, the Pensacola Police Department performed a traffic stop on Jackson on or about September 17, 2015, at which time Jackson informed officers his residence is XXXXXXXXX Street, Pensacola, Florida. This indicates in the three months between the FBI interview and his encounter with PPD, Jackson moved from his XXXXXXXXX Avenue residence to the XXXXXXXXX Street residence. Moreover, on multiple occasions during 2016, members of the Joint Terrorism Task Force surveilled Jackson’s vehicle at XXXXXXXXX Street, Pensacola, Florida, thus confirming it is where he is currently located. To date, based upon law enforcement surveillance, your affiant believes Jackson still resides in Pensacola, Florida.

20. Based upon the foregoing, I respectfully submit there is probable cause to believe that Robert Blake Jackson has committed a violation of Title 18, United States Code, Section 1001. That is, there is probable cause to believe that Jackson made material false statements to the FBI.

**REQUEST FOR SEALING**

I further request that the Court order that all papers in support of this application, including the affidavit and warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

  
\_\_\_\_\_  
Alex Nogueiras, Jr.  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on July 25, 2016

  
\_\_\_\_\_  
Elizabeth M. Timothy  
UNITED STATES MAGISTRATE JUDGE

FILED July 25, 2016  
(Date)

NORTHERN DISTRICT OF FLORIDA  
U.S. MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT

for the

Northern District of Florida

United States of America

v.

Robert B. Jackson

Case No. 3:16mj143

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

CERTIFIED A TRUE COPY  
Jessica J. Lyublanovits  
By: Jessica M. Steward  
Deputy Clerk

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Robert B. Jackson

who is accused of an offense or violation based on the following document filed with the court:

- Indictment
- Superseding Indictment
- Information
- Superseding Information
- Complaint
- Probation Violation Petition
- Supervised Release Violation Petition
- Violation Notice
- Order of the Court

This offense is briefly described as follows:

-False Statement to a Federal Law Enforcement Officer

Date: July 25, 2016

Elizabeth M. Timothy  
Issuing officer's signature

City and state: Pensacola, Florida

U.S. Magistrate Judge Elizabeth M. Timothy  
Printed name and title

Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title