

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.

UNITED STATES OF AMERICA,

Plaintiff,

**FILED UNDER SEAL PURSUANT
TO ORDER**

v.

MUHAMMAD MASOOD,


ORDER TO SEAL

Defendant.

This United States has submitted a motion requesting that the Court seal the Complaint and accompanying affidavit in the above-referenced case until the Defendant is arrested. The Court determines that good cause exists to allow the request.

Accordingly, IT IS HEREBY ORDERED that the Government's motion to seal is GRANTED.

Dated: March 19, 2020


The Honorable David T. Schultz
United States Magistrate Judge

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 20-115-222 DTS

MUHAMMAD MASOOD

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) MUHAMMAD MASOOD,

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

On or about March 19, 2020, in Hennepin County, in the State and District of Minnesota, defendant attempted to provide material support to a designated foreign terrorist organization

in violation of Title 18, United States Code, Section(s) 2339B.

Date: 3/19/20


Issuing officer's signature

City and State: Minneapolis, MN

The Honorable David T. Schultz
United States Magistrate Judge

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

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 20-MJ-274-STS

MUHAMMAD MASOOD

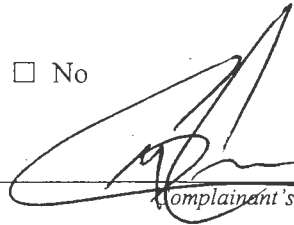
CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 19, 2020, in Hennepin County, in the State and District of Minnesota, defendant attempted to provide material support to a designated foreign terrorist organization in violation of Title 18, United States Code, Section(s) 2339B.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No



Complainant's signature

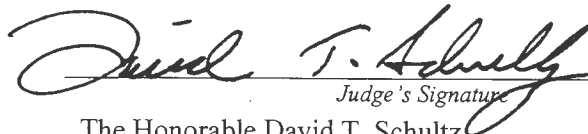
Carson Green, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/19/20

City and State: Minneapolis, MN



Judge's Signature

The Honorable David T. Schultz
United States Magistrate Judge

Printed Name and Title

10-11-23, 1275

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION FOR A CRIMINAL
COMPLAINT**

I, **Carson Green**, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”). I have been employed by the FBI since September of 2009. Since February of 2010 I have been assigned to the Joint Terrorism Task Force (the “JTTF”) of the FBI’s Minneapolis Division. In this capacity I investigate, among other things, criminal cases relating to international terrorism, such as allegations of the provision of material support to designated foreign terrorist organizations. In addition to my on-the-job experience, the FBI has provided me with extensive training in international terrorism and the techniques used to investigate allegations of international terrorism.

2. I make this Affidavit in support of an application for a criminal complaint for Muhammad Masood, a citizen of Pakistan, born in October of 1991, residing in Rochester, Minnesota, for violating Title 18, United States Code, § 2339B, Attempting to Provide Material Support to a Designated Foreign Terrorist Organization (“FTO”).

3. The facts set forth in this affidavit are based on my own personal knowledge, information provided by two reliable Confidential Human Sources (hereafter “CHS-1” and “CHS-2” individually and “CHSs” collectively¹), information provided by other law enforcement officers, recordings of conversations between the two CHSs, my review of documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information

¹ The CHSs are paid informants for the FBI. Both CHSs have been found to be reliable sources for the FBI.

gained through my training and experience. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. In this affidavit, the FBI has provided translations of certain Arabic words or phrases. These translations are based on information provided to me by an FBI linguist and from my training and experience. I have indicated the translations by bracketing the English translations that came from Arabic recordings and documents.²

BACKGROUND

5. Based on my training and experience as a Special Agent in the FBI, as well as the facts as set forth in this affidavit, there is probable cause to believe that MUHAMMAD MASOOD (hereafter MASOOD), attempted to provide material support and resources to a foreign terrorist organization—that is, the Islamic State of Iraq and Al-Sham (“ISIS”)--in violation of Title 18, United States Code, § 2339B. Specifically, Masood attempted to provide material support and resources, as that term is defined in Title 18 United States Code, Section 2339(a), including personnel (himself), to ISIS.

6. On February 19, 2020, MASOOD met with CHS-1 and CHS-2 and pledged allegiance or “bayat” to ISIS and its leader and discussed his desire to travel to Syria and fight for ISIS. Based on my training and experience, I understand the term “bayat” to mean making a solemn promise.

7. On or about February 21, 2020, MASOOD purchased a plane ticket from Chicago to Amman, Jordan. Based on the meeting between CHS-1, CHS-2 and MASOOD, and online

² The transcriptions and translations are in preliminary form and have not yet been finalized.

communications with CHS-1, MASOOD believed CHS-1 and CHS-2 were members of ISIS who would help facilitate his travel to Syria and that his flight from Chicago to Amman would enable him to connect with ISIS members overseas, who, in turn, would assist MASOOD with traveling to ISIS within Syria. On February 25, 2020, MASOOD purchased an Amtrak train ticket for travel between La Crosse, Wisconsin and Chicago, Illinois on March 22, 2020. Your affiant is aware that Amtrak runs a shuttle between Rochester, Minnesota and La Crosse, Wisconsin for its customers wishing to access its train line.

8. On March 16, 2020, MASOOD's travel plans changed because Jordan closed its borders to incoming travel based on the Coronavirus pandemic. Along with CHS-1, MASOOD developed a plan to fly from Minneapolis, Minnesota to Los Angeles to meet up with CHS-1, who would assist MASOOD with travel via cargo ship to join ISIS.

9. On March 19, 2020, MASOOD traveled from Rochester, Minnesota to Minneapolis-St. Paul International Airport (hereafter MSP) to board a Southwest Airlines flight to Los Angeles, California. Upon arrival at MSP, MASOOD checked luggage at the ticket counter and received his boarding pass from the airline's employee. MASOOD then proceeded through security and was subsequently arrested by the FBI for violating Title 18, United States Code, Section 2339B.

STATUTORY AUTHORITY

10. Title 18, United States Code, Section 2339B prohibits, in pertinent part, a person from knowingly providing "material support or resources to a foreign terrorist organization," or attempting or conspiring to do the same.

11. "The term 'material support or resources' means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities,

financial services, lodging, training, expert advice or assistance, safe houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” Title 18, United States Code, Section 2339A(b)(1). “The term ‘training’ means instructions or teaching designed to impart a specific skill, as opposed to general knowledge.” Title 18, United States Code, Section 2339A(b)(2). “The term ‘expert advice or assistance’ means advice or assistance derived from scientific, technical or other specialized knowledge.” Title 18, United State Code, Section 2339A(b)(3).

12. Title 18, United States Code, Section 2339B(h) states “no person may be prosecuted under this section in connection with the term ‘personnel’ unless that person has knowingly provided, attempted to provide, or conspired to provide, a foreign terrorist organization with 1 or more individuals (who may be or include himself) to work under that terrorist organization’s direction or control or to organize, manage or supervise, or otherwise direct that operation of that organization. Individuals who act entirely independently of the foreign terrorist organization to advance its goals or objectives shall not be considered to be working under the foreign terrorist organization’s direction and control.”

THE ISLAMIC STATE OF IRAQ AND AL-SHAM

13. On or about October 15, 2004, the United States Secretary of State designated al Qaeda 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 (the INA) and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

14. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under section 219 of the INA 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 FTO listing: The Islamic State of Iraq and al-Sham (i.e., “ISIS” – which is how the FTO will be referenced herein), the Islamic State or Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, an Al-Furqan Establishment for Media Production. In an audio recording publicly released on or about June 29, 2014, ISIS announced a formal change of its name to the Islamic State. On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

FACTS ESTABLISHING PROBABLE CAUSE

15. The FBI initiated an investigation in or around January of 2020, based on information which indicated encrypted Social Media Platform (SMP) user “BB” was planning to provide material support to the foreign terrorist organization, ISIS, by requesting assistance on making Hijra.³ As set forth below, I have determined that the encrypted SMP user “BB” (hereinafter referenced as BB) is MASOOD.

16. On or about January 24, 2020, the user contacted CHS-1 via encrypted SMP username “BB” and requested assistance from CHS-1 to make Hijra. BB used the SMP to

³ Based on my training and experience, conversations with other experienced agents, and conversations with FBI linguists fluent in Arabic I have learned “Hijra” or “Hijrah,” is an Arabic word meaning “migration” but was commonly used by ISIS to refer to migration to ISIS-controlled territory for the purpose of joining or supporting ISIS to engage in violent jihad. “Jihad” is an Arabic word that literally means striving or struggling, but in the context of ISIS supporters, commonly refers to a holy war, fight, or struggle against the enemies of Islam.

discuss the Khilafah⁴ and “dawla⁵ al islamia” (widely known to be additional names for ISIS) with CHS-1.

17. During a conversation on SMP with CHS-1 on or about January 24, 2020, BB provided the following information about himself:

- BB is 28 years old;
- BB was a medical doctor when BB lived in Pakistan;
- BB currently lives in the United States and is an H-1B Visa holder;⁶
- BB has lived in the United States for just about two years; and
- BB has a Pakistani passport;

18. BB told CHS-1 that BB wanted to make Hijra to al-Sham,⁷ Iraq, or perhaps Khurasan⁸ because “i want to fight on the frontline as well as help the wounded brothers . . . because who ever [sic] leaves for hijrah and [REDACTED] **فقد وثابه**.”⁹ BB indicated that he wanted to join ISIS to fight, stating “inshAllah a perosn [sic] like me belongs on the frontline not anywhere else.” BB asked CHS-1 for advice on how to complete Hijra. CHS-1 stated to

⁴ Khilafah refers to ISIS’s claim that it has established a worldwide “caliphate,” or a system of government in which an absolute ruler, known as a “caliph,” has supreme religious, political and military authority and governs according to a body of Islamic law known as “Sharia law.”

⁵ Dawla is an Arabic word that literally means state, but in this context, it is a term used by ISIS sympathizers to refer to the Islamic State.

⁶ An H-1B Visa is a visa in the United State that allows U.S. employers to temporarily employ foreign workers in specialty occupations.

⁷ al-Sham refers to the modern day country of Syria.

⁸ Khurasan is an ancient geographical description starting in the northeastern region of Iran stretching to Afghanistan.

⁹ According to an FBI Linguist, the Arabic phrase [REDACTED] and **فقد وثابه** means “then, he will die or then, death is realized” and “his reward becomes due and is certain with Allah.”

BB, “I told you akhi¹⁰ it’s all about niya¹¹ and my advice will not help you here.” BB responded, “as i doctor i want to help mujahedeen¹² on the ground. [sic]” BB indicated to CHS-1 that because he was currently in the United States, “sometimes i wanto [sic] attack enemy when i am behind enemy linea [sic] itself” because “not many people cant [sic] even reach here to attack.” Discussing his travel to make Hijra, BB noted that he will lose the chance to conduct an attack in the United States: “i wonder if I will miss the opportunity of attacking the enemy when I was in the middle of it.”

19. BB explained to CHS-1 that BB wanted to make Hijra because BB “hates smiling at the passing kuffar¹³ just to not make them suspicios [sic] . . . I cannot tolerate it anymore.” BB indicated that he wanted assistance from CHS-1 to make Hijra without raising suspicion. BB further indicated that he wanted to conceal his true intentions – i.e., to join ISIS – from authorities, telling CHS-1 that BB could find a NGO (Non-government Organization) which could hire BB on paper as a doctor. During one conversation, BB told CHS-1 that BB wanted to leave by the end of February because BB’s parents would return in April and would not permit BB to leave the United States.

20. On or about January 25, 2020, and continuing on January 26, 2020, BB initiated conversation with CHS-1, continued to discuss ISIS and he continued to inquire about CHS-1’s

¹⁰ Akhi is a slang word meaning “brother” or “my brother” and is often used as a term of endearment between two Muslim males.

¹¹ Niya, in this context, means intention. CHS-1 is asking BB what BB’s intention is for making Hijra.

¹² Mujahadeen (also spelled mujahideen) are those engaged in jihad. Your affiant believes Masood uses this term to mean fighter for Islam fighting against non-Muslims.

¹³ Kuffar is an Arabic term meaning infidel, disbeliever, or nonbeliever. In the context of ISIS supporters, commonly refers to any non-believer or non-Muslim.

ability to help BB to make Hijra. They discussed BB's current travel plan to go to Turkey or Jordan in order to make Hijra onward to Syria. During discussions on the travel route, BB requested CHS-1 assist BB with BB's plans to make Hijra, specifically by obtaining a visa for travel to Jordan. Via the SMP, BB provided CHS-1 a photograph of his Pakistani passport and told CHS-1 that his "real name" is MASOOD. The photograph provided was of a Pakistani passport for MASOOD:



21. The picture of the passport matched Department of Homeland Security records for H-1B visa holder MUHAMMAD MASOOD. MASOOD's visa application indicates that MASOOD is a licensed medical doctor in Pakistan, which is how BB had described himself to CHS-1. Department of Homeland Security records show that MASOOD entered the United States on or around February of 2018. This is consistent with BB having told CHS-1 that he had been in the United States for almost two years. Until shortly before his arrest, MASOOD had worked for a known medical clinic in Rochester, Minnesota as a Research Coordinator, which your affiant verified by reviewing that medical clinic's employment records.

22. After sending the picture of his passport, MASOOD told CHS-1 that he was forced to cut his beard short because of pressure from his family and the "kuffar." I have reviewed MASOOD's photograph that is maintained by the Minnesota Department of Vehicle Services in connection with an identification card issued in July of 2019, as well as photographs taken during surveillance of MASOOD on or about January 29, 2020, and have observed that his beard is indeed shorter than in his passport photograph. By the end of the January 25, 2020, conversation with MASOOD, CHS-1 told MASOOD "I will talk to the brothers and I will start working on hijrah process akhi." MASOOD affirmed, "ok inshAllah."¹⁴ Based on my training and experience, and the context of the conversations between MASOOD and the CHSs, your affiant understands that MASOOD and the CHSs used the phrase "the brothers" in reference to other members of ISIS.

23. On January 27, 2020, MASOOD continued communicating on SMP with CHS-1 about what he intended to do if he was able to make Hijra:

¹⁴ InshaAllah means if Allah wills it.

when i first came here...wa Allahe even then it was just because i wanted to learn something that would be useful in qital¹⁵. . . that only kuffar teach civillians [sic] and only army teaches to army in Pakistan . . . that was my niyah

. . . and jihad is fard al ain¹⁶ today . . . my parent would get heart too . . . but i have my brother who is capable now of taking care of them . . . and only then i am leaving them and fulfilling my duty

i want to go back and do engineering sometimes . . . make drones . . . istishhadi¹⁷ drones

During a discussion about viewing information from Dawla, MASOOD added that he wanted to “. . . bitcoin [sic] link in it at the end so akhwan¹⁸ can donate but I need [sic] to find a way to donate anonymously.”

24. On or around January 29, 2020, MASOOD continued discussing Hijrah with CHS-1. On this date, he asked the CHS-1 if “the brothers” have travel plans arranged for him yet. CHS-1 replied to MASOOD that he would check with the brothers to get an update. MASOOD told the CHS that he (MASOOD) wanted to leave by the end of February and that he planned to sell his possessions, provide notice about leaving to his employer, and notice to his landlord about rent: “i just need to know at least a month in advance as to when i have to go...because I have to resigm [sic] from job and give notice to leaving rented place and things like that i have already planned it though.” MASOOD further explained that he will need weapons training when he joins ISIS and he discussed the use of small drones that can be

¹⁵ Qital means fight or combat in Arabic, and is often used interchangeably with jihad.

¹⁶ Your affiant understands this (“fard al ain”) to mean Fard al-Ayn, which, in Islamic Law, refers to each individual Muslim’s legal obligations. In this context, I understand MASOOD to be saying that it is his obligation to engage in jihad.

¹⁷ Istishhad is the Arabic word for martyrdom. Istishhadi means “martyrdom seeker,” and is used to refer to a suicide bomber.

¹⁸ Akhwan is the plural of akhi to describe the “brothers.”

purchased online and turned into “istishhaddi” (meaning martyr or suicide) drones for use in Syria or in America. MASOOD also told the CHS that he wanted his final destination to be Syria because “i wanna [sic] go to sham because may be qiyamah¹⁹ is very close . . . and inshAllah i want to be part of the army that meets the Rum at Dabiq or Amaq²⁰ inshAllah.” MASOOD also explained his intention is to do jihad: “its about action too akhi . . . those people who were struck in makka²¹ . . . after islamic state [sic] was formed in medina . . . they regretted later on. you have to do your jihad always . . . because if you dont [sic] do jihad and dont [sic] have intension to do jihad then you die on a branch of nifaq.²²”

25. On or around February 1, 2020, MASOOD initiated a conversation with CHS-1 to show CHS-1 an idea MASOOD wanted “the brothers” to work on. During the conversation, CHS-1 told MASOOD “you are going to do hijrah akhi to dawla And you might have to kill people and this is a critical moment to you and to your eman²³ . . . So you might have to do this akhi and I don’t want you to think akhi that I helped you with something that you are not sure about.” MASOOD responded to this question with the following statements:

“akhi”

¹⁹ Qiyamah refers to Islamic concept of the “Day of Judgment,” Allah’s final assessment of humanity, which includes the annihilation and judgment of all sentient creatures.

²⁰ MASOOD says he wants to be part of the Army that meets the Rum (your affiant believes MASOOD means “Romans” or “Crusaders”) at Dabiq or Amaq. Dabiq and Amaq is a battle that will precipitate the end times in jihadist ideology.

²¹ Makka is another way to spell Mecca, which is one of Islam’s holiest sites located in Saudi Arabia.

²² Nifaq means hypocrisy. The word is used to describe people who publicly show themselves as a Muslim but are not following the true religion.

²³ Eman, generally spelled Iman in English, is usually translated as faith or belief and is a word taken from the Quran to describe a person’s righteous faith and deeds.

“i want to kill and get killed...and kill and get killed”

“and again and again”

“this is what even rasool Allah saas wished”²⁴

“even though Allah said waAlkah yasimuka min naas”²⁵

26. On February 13, 2020, MASOOD and CHS-1 discussed via SMP the process by which ISIS recruits foreign fighters. During this discussion, MASOOD told CHS-1 “you know [brother]...there is so much I wanted to do here...lon wulf [sic] stuff you know...but I realized I should be on the ground helping brothers sisters kids inshAllah.” Based on my training and experience, and the context of the conversations between MASOOD and CHS-1, I believe MASOOD is referring to wanting to conduct “lone wolf” terrorist attacks on the United States.

27. MASOOD and CHS-1 also discussed via SMP a meeting in which MASOOD would be able to talk directly in a video conference call with an individual that MASOOD believed was an ISIS commander located overseas who would vet MASOOD. On February 19, 2020, MASOOD traveled from Rochester, Minnesota, to Bloomington, Minnesota. CHS-1 picked MASOOD up at a shopping mall then drove to a nearby hotel. The interactions between CHS-1, CHS-2 (the individual Masood believe to be an ISIS commander located overseas), and MASOOD were recorded. To facilitate the interview with the CHS-2, CHS-1 provided MASOOD a means of communication that MASOOD believed would be secure. Prior to the interview, CHS-1 clarified with MASOOD whether MASOOD still wanted to make Hijra. MASOOD responded affirmatively, stating he was “sick of this place” (referring to living to the

²⁴ Your affiant believes that MASOOD is saying “this is what the messenger of Allah (peace be upon him) wishes.”

²⁵ Your affiant believes that MASOOD is referencing a Quran passage meaning “and Allah will protect you from the people.”

United States). While CHS-1 was preparing the communication equipment, MASOOD produced pieces of paper which appeared to be MASOOD's notes made in preparation for the interview with ISIS personnel. MASOOD explained to CHS-1 that the notes detailed his timeline for Hijra. During conversation with CHS-1, MASOOD told CHS-1 that he had bought a vest for hunting. Based on the context of the conversation and additional conversations about the vest, your affiant believes MASOOD intends to use the vest for combat in Syria. MASOOD asked CHS-1 if MASOOD should take the vest with him to Syria even though the hunting vest might look suspicious.

28. MASOOD then began his interview with CHS-2, who would 'vet' MASOOD to travel overseas and fight for ISIS. CHS-2 asked MASOOD how MASOOD found Dawla. MASOOD explained that he had been looking for the truth and started listening to Anwar al-Awlaki.²⁶ Through al-Awlaki's lectures, MASOOD said he learned that Dawla al Islamiya in Iraq was where the truth was. MASOOD further explained to CHS-2 that he has now, "seen how the kuffar are after coming to the United States and now understands them better." MASOOD also said, "if you want to learn the haqq,²⁷ you have to see which direction the kuffar's arrows are pointing so that's how I found Dawla." CHS-2 asked MASOOD why he wanted to go to Syria. MASOOD responded that he wanted "to be a combat medic...and also fight." CHS-2 clarified by asking MASOOD if he is ready to fight and MASOOD responded affirmatively with

²⁶ Anwar Al-Awlaki was an Islamic lecturer and a leader of Al-Qaeda in the Arabian Peninsula ("AQAP"), a Yemen-based designated foreign terrorist organization that has claimed responsibility for terrorist acts against targets in the United States, Saudi Arabia, Korea and Yemen since its inception in January 2009. Pursuant to a Presidential Executive Order, Al-Awlaki was designated by the United States as a "Specially Designated Global Terrorist" on July 12, 2010. Al-Awlaki was reportedly killed in Yemen in September 2011.

²⁷ Haqq is an Arabic term meaning Truth.

“yes” and later described himself as having “been ready for some time.” CHS-2 offered MASOOD the opportunity to pledge a bayat²⁸ to the leader of ISIS. MASOOD corrected CHS-2 about the correct kunya²⁹ for the ISIS Emir³⁰ and asked, “Isn’t it Abu Ibrahim?” MASOOD then pledged a bayat to ISIS in the Arabic language.

29. During the interview with CHS-2 and during conversations with CHS-1 on or around February 19, 2020, MASOOD expressed concern with the logistics of traveling to Jordan, where MASOOD would be met by ISIS members, and the timing of a travel visa that MASOOD wanted ISIS to provide him. MASOOD suggested he could purchase a travel visa to Jordan on his own but requested a fake visa to keep his identity clean for future travel after joining ISIS. Immediately after the interview with CHS-2 (the purported ISIS commander), MASOOD spoke with CHS-1 about logistics and his timeline for traveling overseas to join ISIS. During these conversations, MASOOD referenced several tasks that he needed to complete before traveling even though MASOOD said he wanted to “go, like, today.” MASOOD stated he did not want to arouse suspicions and told CHS-1 that he needed to complete tasks in a logical way to avoid attention. MASOOD gave examples, such as quitting his research assistant job and giving his landlord notice that he would be vacating his apartment. After considering the timeline, logistics, and his list of tasks with CHS-1, MASOOD stated that he wanted to arrange his travel plans for the end of March of 2020.

²⁸ Bayat, also called bay’ah, is an oath of allegiance to a leader.

²⁹ Kunya, in this context, means nickname or title of respect.

³⁰ Emir also means leader.

30. On or around February 21, 2020, MASOOD sent a message to CHS-1 containing a screenshot of his flight reservation from O'Hare International Airport in Chicago, Illinois, to Amman, Jordan, scheduled for March 22, 2020. The copy of the reservation showed notification of the reservation was sent to an email address known to be used by MASOOD and that it was purchased using a credit card also known to be used by MASOOD. Consistent with his earlier stated plans, MASOOD informed CHS-1 that he will resign from his job on March 17, 2020, then travel by train to Chicago on March 21, 2020. MASOOD wrote that "those few days between 17 to 21 are going to be the most difficult days for me...but may Allah make it easy i am excited as well as worried haha strange." MASOOD completed this conversation with CHS-1 by providing the following screenshot of common ISIS imagery:



31. On or around February 21, 2020, MASOOD utilized a web-based application which allows users to buy and sell items online. The app has been used by MASOOD to list multiple household items for sale including, but not limited to, a mattress, shoe rack, clothing

drying rack, and office chair. MASOOD registered his account on this app using a Google email account othersignups1@gmail.com and user name "M Masood." Multiple people were observed by agents entering MASOOD'S apartment empty-handed then leaving a short time later with household items. Your affiant believes this activity is consistent with the sale of his household items using the aforementioned app.

32. On or around February 23, 2020, an open-source search of MASOOD's Rochester, Minnesota address revealed a rental listing on a known rental website, indicating MASOOD's apartment would be available for rent as of April 1, 2020. The listing on this website had been updated on approximately February 22, 2020. This updated rental listing coincided with text messages exchanged between MASOOD's known cell phone number and a telephone number used by the point of contact for the apartment rental listing that had been identified through a court order.

33. On or around February 25, 2020, MASOOD told CHS-1 that he was going to give a termination notice to his employer indicating that his final day of employment would be March 17, 2020.

34. On February 25, 2020, MASOOD purchased a ticket for travel on Amtrak between Rochester, Minnesota and Chicago, Illinois on March 22, 2020. MASOOD provided Amtrak an email address known to be used by MASOOD and purchased his ticket using a credit card also known to be used by MASOOD.

35. Up until on or about March 14, 2020, MASOOD proceeded with his travel plans from Rochester, Minnesota, to Chicago, Illinois, where he was to board a flight from Chicago O'Hare International Airport on March 22, 2020, bound for the country of Jordan where MASOOD planned to meet members of ISIS. However, the global Coronavirus pandemic

affected MASOOD's arranged travel plans. On or around March 14, 2020, Jordan's government stopped all incoming flights into the country. Shortly after the decision by the country of Jordan, MASOOD contacted CHS-1 about the need to make changes to his travel itinerary.

36. On or around March 16, 2020, CHS-1 and MASOOD discussed alternative routes for travel to join ISIS, including MASOOD possibly traveling on a cargo ship from a port in California that would leave the United States in approximately two weeks. CHS-1 explained that the cargo ship could deliver MASOOD to ISIS territory in approximately two months. In order to facilitate MASOOD's travel on the cargo ship, CHS-1 and MASOOD discussed travel from MSP to Los Angeles International Airport (hereafter LAX). MASOOD agreed with this revised travel plan, stating in part, "if the brothers really need me then i am willing to take the risk of going illegally by cargo ship...not that i want to be in khurasan.. i wanna be in AshSham..but akhi..i am going through a lot right now...Allahu akbar."

37. On or around March 16, 2020, MASOOD messaged CHS-1 stating he had purchased an airline ticket for travel from MSP to LAX scheduled for departure on March 19, 2020, and arriving at LAX at approximately 6:00 p.m. that same day.

38. At approximately 9:00 a.m. on March 19, 2020, agents conducting physical surveillance watched MASOOD board a shuttle bus in Rochester, Minnesota. MASOOD's shuttle bus drove him to MSP Terminal 2. Agents then observed MASOOD walk to the ticket counter at Terminal 2 where MASOOD checked his luggage through to the LAX. MASOOD then proceeded directly through Transportation Security Administration Security Checkpoint #1 – where he was subsequently arrested by the FBI for attempting to provide material support to a designated foreign terrorist organization in violation of Title 18, United States Code, Section 2339B. When arrested, MASOOD had a boarding pass for his flight to LAX in his possession.

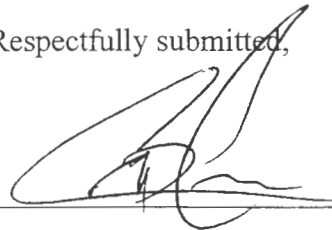
CONCLUSION

39. Based on the information described above, I respectfully submit there is probable cause to believe that MUHAMMAD MASOOD, in the District of Minnesota and elsewhere, attempted to provide material support and resources to a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B.

REQUEST FOR SEALING

40. I further request that Court seal the underlying affidavit supporting the criminal complaint until further order of the Court. My supporting affidavit details matters about the investigation that are not a matter of public information and the premature disclosure of this investigation will jeopardize the FBI's efforts to pursue active leads in this investigation and the ongoing investigation.

Respectfully submitted,



Special Agent Carson Green
Federal Bureau of Investigation

Subscribed and sworn to before me
on the 19th day of March, 2020



THE HONORABLE DAVID T. SCHULTZ
UNITED STATES MAGISTRATE JUDGE