

AUSAs: Camille L. Fletcher, Kimberly Ravener

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

23 MAG 7556

UNITED STATES OF AMERICA

v.

KARREM NASR,
a/k/a “Ghareeb Al-Muhajir,”

Defendant.

SEALED COMPLAINT

Violation of 18 U.S.C. §§ 2339B,
3238, and 2

SOUTHERN DISTRICT OF NEW YORK, ss.:

BILAL MORGAN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation (“FBI”) and charges as follows:

Count One

(Attempted Provision of Material Support and Resources to a Designated Foreign Terrorist Organization)

1. From at least in or about November 2023, up to and including on or about the date of the filing of this Complaint, in Egypt, Kenya, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally attempted to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, to wit, al Shabaab, which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act (“INA”), and is currently designated as such as of the date of the filing of this Complaint, knowing that al Shabaab was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339(B)(g)(6)), that al Shabaab engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that al Shabaab engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B, 3238, and 2.)

The bases for my knowledge and the foregoing charge are, in part, as follows:

2. I am a Special Agent with the FBI, and I am assigned to a counterterrorism squad. I have been personally involved in the investigation of this matter. This affidavit is based in part upon my training and experience, my involvement in this and other investigations, my conversations with law enforcement agents and other individuals, and my examination of reports

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and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

3. KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, is a 23-year-old U.S. citizen who moved to Egypt in approximately July 2023.¹ As set forth in greater detail below, NASR is a supporter of al Shabaab, a designated foreign terrorist organization that has attacked Americans and American allies. Since at least in or about November 2023, NASR has repeatedly expressed his desire and plans to join al Shabaab and wage jihad, including in communications with an FBI confidential source (the “CS”),² who, at the direction of law enforcement, was posing as a facilitator for terrorist organizations.

4. In communications exchanged with the CS and postings online, KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, stated that he had been thinking about engaging in jihad for a long time, and he was particularly motivated to become a jihadi by the October 7, 2023 Hamas terrorist attack in Israel. For example, in communications with the CS, NASR stated that the number one enemy was “evil America,” which he called the “head of the snake.” In recent public social media posts, NASR warned that “Jihad” was “coming soon to a US location near you,” posting airplane, bomb, and fire emojis. In further communications with the CS, NASR expressed his intent to join al Shabaab to receive military training and engage in jihad; that he was prepared to kill and be killed; and that he specifically aspired to be a martyr for the jihadi cause.

5. KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, took specific steps to join and receive military training from al Shabaab, including making flight and lodging reservations for travel to Kenya, where he planned to meet members of al Shabaab for further travel to Somalia to join and train with the group. NASR booked a flight for December 14, 2023, from Egypt to Kenya for purposes of ultimately joining and training with al Shabaab. In addition, approximately the day before his flight, NASR told the CS that he planned to delete data from his cellphone and computer to ensure that if he were detained, law enforcement would not be able to recover evidence of his jihadi activities from those devices. On or about

¹ Based on my review of law enforcement database records, I have learned that KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, lived in the United States until approximately on or about July 16, 2023, when he traveled to Egypt. My review of law enforcement database records did not reveal any records of NASR returning to the United States after his July 16, 2023 departure.

² Based on my involvement in this investigation, including my communications with other law enforcement personnel, I understand that the CS is a paid source, and that information provided by the CS has proven reliable and has been corroborated by independent evidence.

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December 14, 2023, NASR flew from Egypt to Kenya. Later that day, NASR was taken into custody by Kenyan authorities.

Al Shabaab

6. Based on my training and experience as a counterterrorism agent of the FBI, including my review of open source materials, law enforcement materials, and my conversations with other FBI agents who have reviewed, among other things, the materials referred to below, I have learned the following:

a. For years, Somalia has lacked a stable central government and has been vulnerable to intense civil and sectarian violence. In 2004, the Transitional Federal Government (the “Somali TFG”) was established in Somalia under international auspices. However, a loose coalition of violent Islamist insurgents known as the Islamic Courts Union fought against the Somali TFG, and took control of much of southern Somalia. Over time, that loose coalition emerged as the terrorist organization known as al Shabaab.

b. Al Shabaab has relied on violence – targeted assassinations of civilians and journalists, and the use of improvised explosive devices, rockets, mortars, and automatic weapons – to undermine the Somali government, quell the Somali population, and force the withdrawal of foreign troops. In late 2008, for example, al Shabaab caused to be disseminated a videotape depicting the slow decapitation of an accused spy. Al Shabaab has also claimed responsibility for multiple suicide bombing attacks, including an attack on Burundian peacekeepers in Mogadishu on April 8, 2008; five simultaneous suicide bombings targeting Somali government, Ethiopian, and United Nations facilities on October 29, 2008; and another suicide attack against Burundian peacekeepers on February 22, 2009. Al Shabaab has declared that its ultimate goal is the imposition of Sharia, or strict Islamic law, throughout Somalia.

c. Al Shabaab’s former leader, Aden Hashi Ayrow, who had trained with al Qaeda in Afghanistan prior to 2001, called for foreign fighters to come to Somalia to join al Shabaab in a “holy war” against the Ethiopian and African Union forces in Somalia. Ayrow’s call was echoed by al Qaeda’s leadership, including Usama bin Laden and Ayman al Zawahiri, the now-deceased former leader of the terrorist group. As a result of al Shabaab’s recruitment efforts, men from other countries, including the United States, have traveled to Somalia to engage in violent jihad.

d. On February 26, 2008, the U.S. Secretary of State designated al Shabaab as a foreign terrorist organization under Section 219 of the INA, as amended, and as a Specially Designated Global Terrorist under Section 1(b) of Executive Order 13224, as amended. Al Shabaab remains a designated foreign terrorist organization as of the filing of this Complaint.

e. Since that designation, al Shabaab has repeatedly declared publicly its intent to harm the United States. For example, in or about April 2009, al Shabaab declared that it was responsible for mortar attacks against a United States Congressman who had been visiting Somalia. Similarly, after an al Shabaab member was killed in or about May 2008, al Shabaab leaders declared that its fighters would “hunt the U.S. government” and that governments supporting the United States and Ethiopia should keep their citizens out of Somalia. On April 5,

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2008, in response to the U.S. Secretary of State's designation of al Shabaab as a foreign terrorist organization, al Shabaab released a statement that declared a campaign against the United States.

f. On or about February 9, 2012, al Shabaab merged with al Qaeda.

g. Like other Islamist terrorist organizations, including al Qaeda and al Qaeda in the Arabian Peninsula, al Shabaab has an organized command and control structure. Al Shabaab is led by an overall leader or "emir," responsible for all of the organization's activities. The emir is advised by a group known as the majlis al shura (Arabic for "consultation council," and commonly referred to as the "shura council") which discusses and approves major undertakings, including terrorist operations.

h. In conducting terrorist operations, al Shabaab has focused in particular on targeting Americans, including locations in Kenya, Somalia, and the United States. For example:

i. On or about July 12, 2010, an al Shabaab spokesman claimed responsibility for the suicide bombings that took place in Kampala, Uganda, on July 11, 2010, which killed approximately 74 people, including an American citizen.

ii. On or about September 25, 2013, an al Shabaab spokesman claimed responsibility for the attack on a shopping mall in Nairobi, Kenya, on September 21, 2013, which killed approximately 72 people and wounded at least 175 people, including American citizens.

iii. On or about February 21, 2015, a member of al Shabaab appeared in a video posted online and encouraged followers of al Shabaab to conduct attacks in shopping malls in, among other places, the United States.

iv. On or about May 5, 2017, al Shabaab issued a statement through the al-Shabaab run Shahada News Agency announcing that al Shabaab had "foiled a landing operation by Crusader U.S. Special Forces, and they managed to kill and wound a number of their soldiers, and capture weapons and military gear as war spoils." The following day, on or about May 6, 2017, Shahada News Agency released 21 photographs provided by al Shabaab depicting captured U.S. military equipment including electronics, gloves, boots, medical equipment, and an American flag patch.

v. On or about September 1, 2017, al Shabaab's media arm, al Kataib, released an audio recording of a speech by Umar entitled "It Is a Promise of Allah and Allah Fails Not in His Promise." In the speech, Umar, among other things, states that "[t]he US intervention in Somalia has reached its peak, posing a direct threat to the very existence of Muslims in Somalia and their self-determination," that "[t]he US has established military bases in Somalia as well as Somali mercenary troops whom it directly commands, trains and pays," and that "[t]he US has established puppet regimes in Somalia who fulfil its objectives and whose policies are driven by the plundering of the Muslims' resources and plotting against the Muslims in order to lead them to a dark end from which they would reap nothing but lack of religion, lowliness, poverty, ignorance, tribalism, disunity and endless land disputes." In response, Umar

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praised attacks on U.S. forces, stating “[t]he wreckage of their armored personnel carriers litters the roadsides while the internet and social media sites are filled with the pictures of their dead soldiers and destroyed vehicles, the pleas of their captured POWs and the blatant lies of their leaders,” and that “[t]he offensive has resulted in the crusaders being hunted along the roads, their bases being overrun and their military equipment seized.”

vi. On or about July 24, 2019, an al Shabaab spokesman claimed responsibility for a suicide bombing at the office of the mayor of Mogadishu, Somalia. According to the statement, “[t]he target [of the attempted assassination] was the newly appointed U.N. envoy to Somalia,” who is a U.S. national.

vii. On or about December 10, 2020, Cholo Abdi Abdullah, an al Shabaab terrorist, was charged in this District in indictment 20 Cr. 677 (AT) for his role in an al Shabaab plot to hijack commercial aircraft and crash them into a building in the United States, in an attack similar to al Qaeda’s September 11, 2001 terrorist attacks against the United States. In furtherance of that plot, and at the direction of a senior al Shabaab commander who was responsible for, among other things, planning the DusitD2 Attack, Abdullah traveled from Somalia to the Philippines to obtain training and licensing for flying commercial aircraft. In parallel, Abdullah conducted research into the means and methods to hijack a commercial airliner to conduct the intended attack and the tallest building in a major U.S. city, and reported back to senior al Shabaab leaders on the progress of his pilot training and the results of his research. The intended attack was foiled by U.S. and Philippine law enforcement, who arrested Abdullah on or about July 1, 2019.

NASR’s Efforts to Join and Train with Al Shabaab

NASR Expresses His Intention to Wage Jihad

7. Based on my training, experience, and participation in this investigation, including my review of reports of debriefings of the CS and text messages and audio recordings exchanged between KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, and the CS, I have learned the following, in substance and in part:³

a. On or about November 14, 2023, NASR, using an account with display name “Ghareeb Al-Muhajir,” contacted the CS on an encrypted messaging application (the “Encrypted App”).⁴ The CS, at the direction of law enforcement, was posing as a facilitator for

³ All communications referenced herein are being provided in substance and in part unless otherwise indicated.

⁴ The communications discussed herein involving NASR and the CS were primarily conducted in English, with occasional Arabic. I am a native Arabic speaker, and to the extent this affidavit includes descriptions of Arabic-language portions of such communications, those descriptions are based on my review of reports of debriefings of the CS, who speaks Arabic, my own understanding, my training and experience, and draft translations that are subject to revision upon completion of final translations.

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terrorist organizations. NASR conveyed to the CS that he wanted the CS's guidance on how to join al Shabaab. NASR invited the CS to join him in a private chat, which the CS did.

b. In their subsequent private chat, on or about November 14, 2023, NASR told the CS the following:

i. NASR stated that he was 23 years old and born and raised in the United States; his family was from Alexandria, Egypt; and that he was currently in Egypt studying Arabic.

ii. NASR stated that he wanted to make "hijrah to Somalia, God-willing."⁵ NASR explained that he was fit, did not have any medical conditions, and that he had started running to improve his cardio training before doing hijrah. NASR further explained that while he did not know how to design videos, he could write well and he knew how to translate, so he could write for any group that he joined. In addition to his writing and language abilities, NASR noted that he wanted to train to "shoot" with any group he joined.

iii. NASR discussed ways he could make hijrah without being detected. For instance, NASR specifically mentioned that he could pretend to be a tourist or to work for a shipping company.

iv. NASR stated that he wanted to make hijrah as soon as possible and asked the CS if there were many Egyptians or Arabs in Somalia. NASR told the CS that he would never tell his family or friends of his plans to make hijrah.

c. Between on or about November 14 and November 15, 2023, NASR sent multiple voice notes to the CS in which NASR continued to discuss how he could make hijrah and join al Shabaab. On or about November 16, 2023, the CS told NASR that the brothers (the "Brothers"), a reference to purported members of al Shabaab, needed NASR to answer certain questions to gauge his commitment to join al Shabaab and to become a mujahideen.⁶ The CS then posed several questions to NASR, who responded as follows:

i. The CS asked NASR if he had previously supported mujahideen. NASR responded "no except I wrote some stuff on my Twitter account but its anonymous. . . . Mostly just retweeting other people's tweets." NASR also provided a link to his X (formerly Twitter) profile.

ii. NASR conveyed he was ready to make hijrah, and acknowledged that waging jihad would require him to leave the comforts of living in Egypt or the United States

⁵ Based on my training, experience, and participation in this investigation, I understand "hijrah" (or "hijra") to be an Arabic term normally used to refer to migration, but which is often used by those with extremist views to describe a foreign fighter's journey abroad to wage jihad.

⁶ Based on my training, experience, and participation in this investigation, I understand "mujahideen" (or "muj") to be an Arabic term that refers to a person who engages in jihad.

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for a place where living conditions were challenging and required moving from one location to another.

iii. The CS then asked NASR if he was ready to leave his family. NASR responded “yes inshallah.”⁷

iv. The CS asked NASR about how he came to have the beliefs that they had been discussing. NASR responded that he came to his aqeedah⁸ after becoming more religious. Specifically, NASR stated that “I used to be an 3ammi [meaning blind or ignorant]⁹ but then I became religious and I saw how Islam solves the problems of the world and I learned about establishing sharia and khilafa is something we need to strive for.”¹⁰

d. On or about November 16, 2023, NASR, when explaining why he wanted to join al Shabaab, described his views regarding the ideology of various terrorist organizations. NASR explained that he believed that Da’esh’s¹¹ ideology was “no good” and that “tantheem al q3da has the best manhaj from all [Islamic] groups right now.”¹² NASR then sent the CS two voice notes in which he stated the following:

i. Al-tantheem has the best manjah because Al-tantheem follows sharia and more traditional Islamic customs, and they “follow the steps of the jihad.” Other Islamic groups such as the Muslim Brotherhood and Hizb ut-Tahrir “do not call for jihad.” Al-tantheem considers the bigger picture and they do not only look at what is “halal” (meaning things that are allowed) and “haram” (meaning things that are prohibited) when taking actions.

⁷ Based on my training, experience, and participation in this investigation, I understand “inshallah” to be a phrase in Islam meaning God willing.

⁸ Based on my training, experience, and participation in this investigation, I understand “aqeedah” to be an Arabic word that refers to those matters which are believed in, with certainty and conviction, in one’s heart and soul, and which are not tainted with doubt or uncertainty.

⁹ All bracketed or parenthetical explanations herein are based on my training, experience, and participation in this case.

¹⁰ Based on my training, experience, and participation in this investigation, I understand “sharia” to be a reference to strict Islamic law, and “khilafa” to be a reference to a caliphate or Islamic state. As described above, al Shabaab has declared that its ultimate goal is the imposition of Sharia, or strict Islamic law, throughout Somalia.

¹¹ Based on my training, experience, and participation in this investigation, I understand that “Da’esh” is a reference to the Islamic State of Iraq and al-Sham (or ISIS).

¹² Based on my training, experience, and participation in this investigation, I understand “Tantheem Al q3da” and “al-tantheem” to be a reference to an alias for al Qaeda. Based on my training, experience, and participation in this investigation, I understand that “manhaj” is an Arabic word meaning method, path or doctrine. In Islam, manhaj is the systematic method of upholding aqeedah and performing deeds.

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ii. Unfortunately, other movements, such as Da'esh and the Islamic movements in Egypt, focus on the secularists. “But the secularists are not the number one enemy. The number one enemy is America. If we kill El-Sisi [the current president of Egypt] now, another person who is a copy of him would replace him. We have to focus on the number one enemy, which is the head of the snake—which is America.”

iii. “Additionally, inshallah, I would like to become a martyr in the sake of Allah. One more thing also, I think in coming years, inshallah we are going to see here big events in Egypt and the other Arab countries. Inshallah if this happens; I will come back to Egypt, inshallah to help the Muslims in Egypt in their struggle to establish here in Egypt.”

iv. “I think this is going to be an opportunity to join al Shabaab mujahideen movement would be appropriate for me to gain experience and learn. After the October 7th events, I felt that something has changed. To the better I mean. I felt that pride and dignity came back to the Muslims. I do not know if you follow the news in the West, but there are a lot of people now in America, not Muslims, just reading the letter from Sheikh Usama bin-Laden, letter to America, or letter to the American people, he explains why AQ is doing what they are doing. And there are a lot of people, because of this letter, have completely changed their opinion on him, and they finally understand how evil America is.”

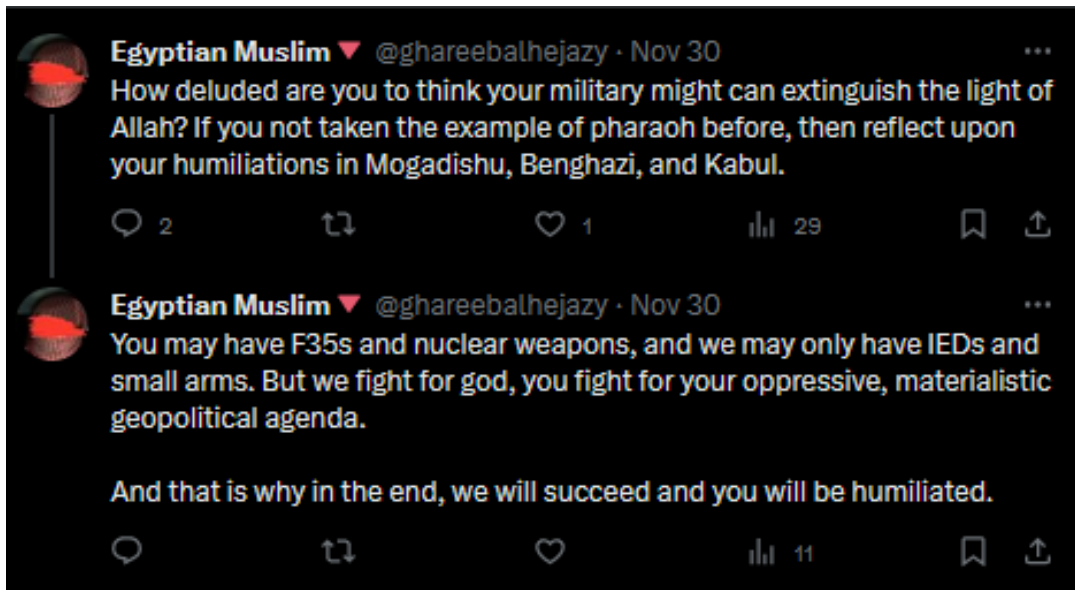
e. Later on or about that same day, in continued communications with the CS, NASR acknowledged that jihad meant that NASR was going to fight, that there was a possibility that he would be killed, injured, or captured as a jihadi, and that there was a possibility that NASR may have to kill or injure others.

f. Later on or about that same day, NASR sent the CS a voice note in which NASR asked, “do you think I can continue my Islamic studies with you? Or not possible?” The CS asked NASR if he wanted to engage in jihad or study. NASR responded “j,” meaning jihad. NASR then stated, “but I also wish I could continue my studies if it is possible.” In response, the CS conveyed that the CS could only help NASR with jihad. NASR responded “ok.”

g. Also on or about that same day, NASR provided the CS with a link to his X (formerly Twitter) account (the “NASR X Account”). Based on my review of publicly available content from the NASR X Account, I have learned that the username for the NASR X Account is “@GhareebAlhejazy.” A review of the publicly available content on the NASR X Account revealed, among other things, the following comments and reposts of statements in support of jihad, terrorist ideology, and targeting America:



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Egyptian Muslim ▼ reposted

[Redacted] · Oct 20
A message from an al-Qaeda mujahid in al-Farooq camp to the world: We are coming!



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h. On or about November 17, 2023, NASR sent the CS a voice note in which he stated the following:

I have been thinking about this for a long time. As I have said, I was not capable of doing it. But when the operation, Flood the Aqsa [a reference to the October 7, 2023 Hamas terrorist attack on Israel] started, I felt something has changed in the world. I felt something is different in the world. It gave me a little push to make hijrah. One more thing, I saw the video of the Zionist bombing the hospital al-Ahli in Gaza. I know that they brought this bomb from America. Wallahi [meaning I swear to God] from the moment I saw the video, I said I would never come back to America inshallah.

i. NASR also conveyed that he had “read some of the inspire mags”¹³ that he had obtained online when considering hijrah.

j. On or about December 7, 2023, NASR wrote to the CS “I have some beautiful news. Today I met a brother who told [me] I look like I should go fight with abu obeida. A sign of things to come inshallah, heart emoji.”¹⁴

NASR Expresses His Intention to Join al Shabaab

8. Based on my training, experience, and participation in this investigation, including my review of reports of debriefings of the CS, and text messages and audio recordings exchanged between KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, and the CS, I have learned the following, in substance and in part:

a. On or about November 16, 2023, NASR informed the CS that he intended to go to “Somal[ia]” and that al Shabaab was engaged in jihad in Somalia. NASR conveyed that he wanted to join “Al shabaab,” and asked the CS if the CS thought NASR should “join a different one? Like AQIM/JNIM?”¹⁵ The CS conveyed that it was NASR’s decision.

¹³ Based on my training, experience, and participation in this investigation, I understand that Inspire magazine was the flagship English-language publication of al Qaeda in the Arabian Peninsula. Inspire magazine has been cited as a key source of inspiration for many domestic and international Islamist extremists. It was also one of the first al Qaeda publications to promote the concept of “open source jihad” or lone wolf attacks using everyday items as weapons.

¹⁴ Based on my training, experience, and participation in this investigation, I understand “abu obeida” to be a reference to Abu Obaida, the name used by a spokesperson for the military wing of Hamas.

¹⁵ Based on my training, experience, and participation in this investigation, I understand “AQIM” to be a reference to al Qaeda in the Lands of the Islamic Maghreb and “JNIM” to be a reference

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b. On or about November 17, 2023, the CS asked whether NASR would be able to pay the travel expenses to make hijrah to join al Shabaab. NASR responded he had sufficient funds to pay for a flight and hotel in an African country.

c. On or about November 19, 2023, NASR stated, “I was thinking going to Somalia would be good experience for me. I can get training and experience there. And after they take Somali I could go to Mali or Yemen.” The CS asked NASR whether he wanted to make hijrah to Somalia, and NASR responded “Yes.” The CS then asked NASR why NASR wanted to make hijrah to Somalia, and whether it was for jihad or some other purpose. NASR responded “to please Allah and bring victory to the Muslims.” NASR also conveyed that he wanted to get training “in a camp,” and that he understood that making hijrah was a commitment. Based on my training, experience, and participation in this investigation, I have learned that al Shabaab provides military training to recruits in training camps run by members of al Shabaab in Somalia.

d. On or about November 20, 2023, in reference to his desire to travel to wage jihad, NASR asked the CS about options other than Somalia, and for advice about the most suitable option. The CS reiterated that the decision was NASR’s, and conveyed that NASR faced two options – either pursuing hijrah and jihad, or not. NASR responded “OK, I understand . . . inshallah. Can I have a moment please.” CS responded that NASR should take as long as he wanted to decide, and NASR should let the CS know once he had made his decision.

e. The following day, on or about November 21, 2023, NASR wrote the CS: “I’ve made my decision. I’m ready inshallah to go to Somal[ia].”

NASR Plans and Travels to Join Al Shabaab

9. Based on my training, experience, and involvement in this investigation, including my review of reports of debriefings of the CS, and text messages and audio recordings exchanged between KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, and the CS, I have learned the following, in substance and in part:

a. Beginning on or about November 18, 2023, and in the course of some of the communications described above, NASR began discussing the logistics surrounding his plans to travel to Somalia and join al Shabaab. For example:

i. In a discussion about routes to Somalia, the CS told NASR that he could either travel from the United States or, alternatively, directly to Kenya, where he would be smuggled to the al Shabaab camp. The CS asked NASR what his cover story for his travel to Kenya would be, and NASR responded that he could pretend to be a tourist. NASR provided estimates of travel costs to the CS and told the CS that he could afford the travel because he had approximately \$3,000.

to Jama’at Nusrat al-Islam wal-Muslimin, both of which are designated foreign terrorist organizations.

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ii. NASR conveyed concerns about returning to the United States en route to Kenya, for fear of law enforcement detection in the United States. NASR suggested that it would be safer for him to travel from places like Egypt or Turkey.

iii. NASR asked the CS whether he would need “to bring money for my own gun and other supplies” or be provided with those materials. The CS responded that NASR would be provided with equipment. NASR asked whether he “should bring money for anything else? . . . should I carry it in cash or is debit card ok?” The CS responded that if NASR intended to make hijrah, he should research flight and hotel expenses and ensure he could afford those, and he could bring approximately \$1,000 in cash for the hijrah. NASR and the CS discussed NASR planning to fly to Kenya in January.

b. On or about November 19, 2023, the CS conveyed that, once NASR arrived in Kenya, al Shabaab members would transport NASR to the al Shabaab training camp in Somalia. The CS also conveyed that NASR should think of a cover story for why NASR was traveling to Kenya. NASR responded “What about tourism? I can do research about Kenya and I will book a return ticket not one way.”

c. On or about November 29, 2023, NASR wrote to the CS that he intended to wear a suit when traveling so he would look respectable.

d. On or about November 30, 2023, NASR told the CS that he had booked a flight for the trip, and shared a screenshot of information for a flight leaving Cairo, Egypt on January 11, 2024, and arriving in Nairobi, Kenya on the following day. NASR also shared a screenshot of a reservation for a one-night stay at a hotel in Nairobi and a screenshot of a reservation for a flight to John F. Kennedy Airport in New York from Nairobi on January 18, 2024, consistent with NASR’s statement that he would book a return flight in an effort to avoid law enforcement detection.

e. On or about December 1, 2023, NASR told the CS that he had applied for a visa to travel to Kenya. NASR also asked the CS whether he should buy a SIM card for his phone to avoid law enforcement tracking his location.

f. On or about December 5, 2023, NASR told the CS that his application for a visa to travel to Kenya had been approved.

g. On or about December 9, 2023, NASR told the CS that his mother was traveling to Egypt on or about December 15, 2023, and she wanted him to return to the United States with her on or about December 29, 2023. NASR explained that his mother’s trip to Egypt was a “problem” because he did not intend to return to the United States, and his mother might learn of his plan to make hijrah. NASR suggested that the solution to the “problem” was for him to travel to Kenya sooner than January 11, 2024 and stay in Nairobi until the Brothers could meet him. NASR then sent a screenshot for an apartment posting in Nairobi, and stated that he could rent that apartment for a month.

h. On or about December 10, 2023, the CS asked NASR whether his mother knew that he was thinking about hijrah. NASR responded that she did not know. The CS then

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asked why his mother wanted to take him back to America, and NASR responded that “parents nowadays have no interest in religion and they do not want their children to be mujahideen. They want their children to see life, be doctors, engineers, and make a lot of money. As I said, they do not want their children be mujahideen and scholars. She wants me to come back to America to continue my education and work.”

i. On or about December 12, 2023, NASR sent the CS a screenshot of a reservation that he had booked for a flight leaving on December 14, 2023 from Cairo, Egypt with a layover in Addis Ababa, Ethiopia, and a final destination in Nairobi, Kenya.

j. On or about December 12, 2023, NASR told the CS that he planned to delete data from his laptop and cellphone prior to traveling to Kenya to destroy any evidence that law enforcement could use if he were detained. Also on or about December 12, 2023, NASR told the CS that he had shaved most of his beard to avoid looking suspicious.

k. On or about December 13, 2023, when the CS asked what kind of training NASR hoped to obtain from al Shabaab, NASR responded that he was interested in “regular military training” but he was prepared to do whatever the Brothers wanted him to do. NASR also told the CS that he had purchased boots to bring with him to Somalia, and sent the CS a photo of the boots he had purchased. NASR discussed with the CS how NASR intended to avoid detection if questioned by Kenyan law enforcement, and sent certain planned responses to questions he may receive from immigration authorities in Kenya.

l. On or about December 14, 2023, NASR flew from Egypt to Kenya. Later that day, NASR was taken into custody by Kenyan authorities.

AUSAs: Camille L. Fletcher, Kimberly Ravener

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, and that he be imprisoned or bailed, as the case may be.

FURTHER, the Government respectfully moves for this Complaint and the associated arrest warrant to remain sealed, with the exception that this Complaint and the arrest warrant are unsealed or the limited purpose of disclosing the existence of or disseminating this Complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant’s arrest, extradition, or expulsion as otherwise required for purposes of national security.

s/ Bilal Morgan /otw

Bilal Morgan
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of this Complaint by reliable electronic means (telephone), this 14th day of December, 2023.



THE HONORABLE OINA T. WANG
United States Magistrate Judge
Southern District of New York