

AO 91 (rev.11/11) Criminal Complaint

AUTHORIZED AND APPROVED DATE:

JESSICA PERRY

Digitally signed by JESSICA PERRY Date: 2024.10.08 11:46:37 -05'00'

United States District Court

for the

WESTERN

DISTRICT OF

OKLAHOMA

United States of America

v.

Nasir Ahmad Tawhedi, a/k/a "@Abu_Omir"

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Case No: M-24-760-SM

CRIMINAL COMPLAINT

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

From in or about June 2024, through on or about October 7, 2024, in the Western District of Oklahoma, the defendant violated:

Code Section

Offense Description

18 U.S.C. § 2339B

Providing, attempting to provide, and conspiracy to provide material support and resources to a designated foreign terrorist organization.

18 U.S.C. § 924(h)

Knowingly receiving, conspiring to receive, and attempting to receive firearms and ammunition to be used to commit a felony or Federal crime of terrorism.

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Nathan Wilkins, Federal Bureau of Investigation, which is incorporated and made a part hereof by reference.

[X] Continued on the attached sheet.

[Handwritten signature of Nathan Wilkins]

Complainant's signature

Nathan Wilkins
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence.

Date: OCTOBER 8, 2024

[Handwritten signature of Suzanne Mitchell]

Judge's signature

City and State: Oklahoma City, Oklahoma

Suzanne Mitchell, U.S. Magistrate Judge
Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA

v.

NASIR AHMAD TAWHEDI
a/k/a “@Abu_Omir”

Case No. M-24-760-SM

Filed Under Seal

AFFIDAVIT IN SUPPORT OF
APPLICATION FOR COMPLAINT

I, Nathan Wilkins, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of criminal complaint charging **NASIR AHMAD TAWHEDI** (a/k/a “@Abu_Omir”) (hereinafter “**TAWHEDI**”) with conspiring to provide and attempting to provide material support and resources to a designated foreign terrorist organization, that is the Islamic State of Iraq and al-Sham (hereinafter referred to as “**ISIS**”), in violation of Title 18, United States Code, Section 2339B; and receiving, attempting to receive, and conspiring to receive a firearm and ammunition to be used to commit a felony or a Federal crime of terrorism, in violation of Title 18, United States Code, Section 924(h) (the “**Subject Offenses**”).

2. I am a Special Agent with the FBI’s Joint Terrorism Task Force (“**JTTF**”). I have been employed as a Special Agent with the FBI since October 2019, and I am currently assigned to the Oklahoma City Division. In this capacity, my responsibilities

include the investigation of possible violations of federal law. During my career, my investigations have included a variety of matters, including investigations involving international terrorism, some of which involved the radicalization of United States citizens and those individuals providing material support or resources to Designated Foreign Terrorist Organizations (hereinafter "FTO") in violation of 18 U.S.C. § 2339B. Additionally, I have participated in investigations that involved the utilization of various surveillance techniques and the execution of various search, seizure, and arrest warrants. My training at the FBI Academy also included training regarding website data and other Internet technical matters.

3. I have personally participated in the investigation set forth below, during which a national security threat was identified, and the FBI took appropriate investigative action to mitigate and disrupt that threat. The facts in this affidavit come from my personal observations, my review of documents related to this investigation, oral and written communications with others who have personal knowledge of the events and circumstances described herein, a review of public source information including information available on the Internet, my training and experience, and information obtained from other government agencies, agents, and witnesses. All translations and transcripts referenced herein, including those that are official peer-reviewed translations

and transcripts, are subject to further review and revision as appropriate.¹ This affidavit is intended to show there is sufficient probable cause for the requested criminal complaint, but it does not set forth all my knowledge on the matter.

4. An individual violates Title 18, United States Code, Section 2339B by “knowingly providing material support or resources to a foreign terrorist organization or attempt[ing] or conspir[ing] to do so.” For purposes of Section 2339B, “material support or resources” includes “any property, tangible or intangible, or service, including currency or monetary instruments or financial instruments, financial services, lodging, training, expert advice or assistance, safehouses, 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.” 18 U.S.C. § 2339B(g)(4) (incorporating by reference 18 U.S.C. § 2339A(b)(1)). For purposes of Section 2339B, a “terrorist organization” means “an organization designated as a terrorist organization under Section 219 of the Immigration and Nationality Act.” *Id.* § 2339B(g)(6).

5. An individual violates Title 18, United States Code, Section 924(h) by “knowingly receiv[ing] or transfer[ing] a firearm or ammunition, or attempt[ing] or conspir[ing] to do so, knowing or having reasonable cause to believe that such firearm or

¹ Evidence includes references to writings translated from Arabic, Dari, Farsi, and Pashto. With some variation, each of these languages utilize the Arabic letter system. Dari and Pashto are spoken primarily in Afghanistan.

ammunition will be used to commit a felony [or] a Federal crime of terrorism”

The term “Federal crime of terrorism” is defined as “an offense that—(A) is calculated to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct; and (B) is a violation of (i) . . . 2339B (relating to providing material support to terrorist organizations)” *Id.* § 2332b(g)(5).

6. Based on the following facts, I believe there is probable cause to show that **TAWHEDI** committed offenses under Title 18, United States Code, Section 2339B, in that he conspired and attempted to provide material support to a designated foreign terrorist organization (ISIS), and Title 18, United States Code, Section 924(h), in that he knowingly received, attempted to receive, and conspired to receive a firearm to be used to commit a felony or Federal crime of terrorism, including his conspiracy and attempt to provide material support and resources to a designated foreign terrorist organization, a violation of Title 18, United States Code, Section 2339B, a felony, and a Federal crime of terrorism.

7. As detailed further herein, the evidence gathered in this investigation shows that **TAWHEDI** and co-conspirators are adherents of ISIS ideology and motivated by propaganda generated by or in support of ISIS ; that they planned and took steps to raise funds by selling the family home and their personal property; that they planned and took steps to repatriate immediate family members to Afghanistan on or about October 17, 2024; that they planned and took steps to purchase firearms and ammunition; and that

their ultimate aim was to stage a violent attack in the United States in the name of and on behalf of ISIS, which was planned for Election Day.

BACKGROUND ON ISIS

8. On or about October 15, 2004, the U.S. Secretary of State (“Secretary”) 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 (“SDGT”) under section 1(b) of Executive Order 13224. 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 an SDGT 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 of Iraq and Syria, 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 FTO listing: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SGDT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO. ISIS has numerous branches, some of which are designated FTOs, including ISIS-Khorasan, also known as ISIS-K, which is based in the Afghanistan/Pakistan region.

BACKGROUND ON TAWHEDI AND CC 1

9. It is known to the affiant hereto that **TAWHEDI** is a 27-year-old citizen of Afghanistan who resides in an apartment on Shartel Avenue in Oklahoma City, Oklahoma (the “Shartel residence”). **TAWHEDI** entered the United States on September 9, 2021, on a special immigrant visa and is currently on parole status pending adjudication of his immigration proceedings. **TAWHEDI** resides at the Shartel residence with his wife and their one child, who is approximately one year old.

10. Co-conspirator 1 (hereinafter “**CC 1**”), a juvenile, is a citizen of Afghanistan with legal permanent resident status who resides in a single-family home on Sunrise Drive in Moore, Oklahoma (the “Sunrise Drive residence”). **CC 1** entered the United States on March 27, 2018, on a special immigrant visa. **CC 1** resides at the Sunrise Drive residence with his father, mother, and five siblings (ages 21, 15, 12, 10, and 6). **CC 1** also has a 24-year-old sister who is **TAWHEDI**’s wife.

11. FBI has observed **TAWHEDI** occasionally spending the night in **CC 1**’s residence on Sunrise Drive and has also observed **CC 1** spending the night on occasion in **TAWHEDI**’s residence on Shartel Avenue.

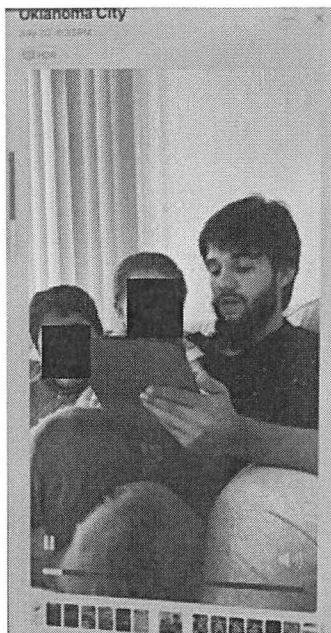
12. Based on my knowledge, training, and experience, and the facts set forth in this affidavit, there is probable cause to believe that during the relevant period as further described herein **TAWHEDI**, **CC 1**, and others have conspired and attempted to provide material support to ISIS. Based on my training and experience and on the facts set forth herein, the purpose of the conspiracy was to provide material support to ISIS in the form

of services (including in the form of a violent attack in the United States involving the use of firearms and ammunition), personnel (**TAWHEDI** and **CC 1**), and money.

13. Based on my knowledge, training, and experience, and the facts set forth in this affidavit, there is probable cause to believe that between no later than in or about August 2024 and October 7, 2024, **TAWHEDI** and **CC 1** entered into a conspiracy to knowingly receive, attempted to receive, and received a firearm to be used to commit a felony or a Federal crime of terrorism, a violation of Title 18, United States Code, Section 924(h).

EVIDENCE OF TAWHEDI AND CC 1's PRO-ISIS IDEOLOGY

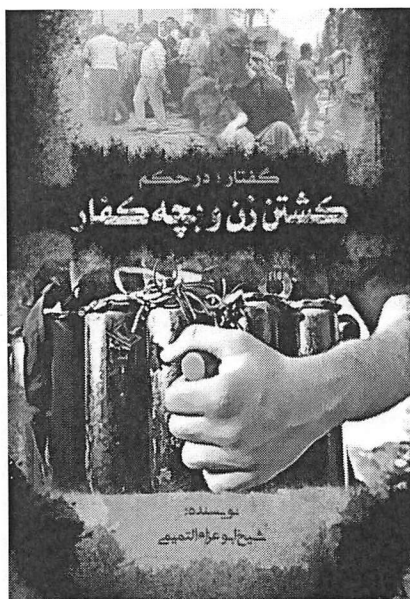
14. FBI observed a video on **TAWHEDI**'s iPhone that appeared to be recorded on or about July 20, 2024, in Oklahoma City, Oklahoma.



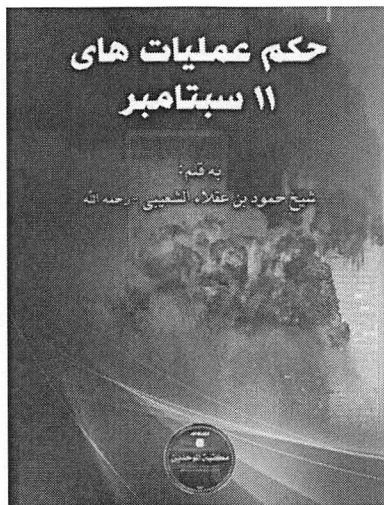
An analysis and summary translation shows that **TAWHEDI**, in the presence of his daughter and **CC 1**'s younger brother, was reading from an electronic device a text that describes the rewards a martyr receives in the afterlife. **TAWHEDI** stated that martyrs will be exempted from the sufferings of the grave, placed in heaven, get married to 72 virgins, and receive a crown full of jewels.

15. As part of the investigation, the FBI served a search warrant on Google LLC ("Google") for a Google account that resolved to **TAWHEDI**.

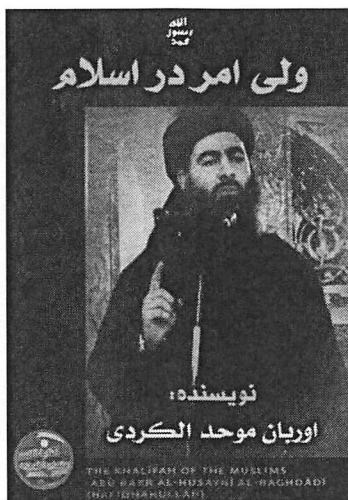
16. Google records show **TAWHEDI** accessed, viewed, and saved ISIS propaganda. The following thumbnail images all resolve to more expansive PDFs of ISIS media texts. These thumbnails of the first page of the texts all derive from a Google drive associated with **TAWHEDI**'s Google account.



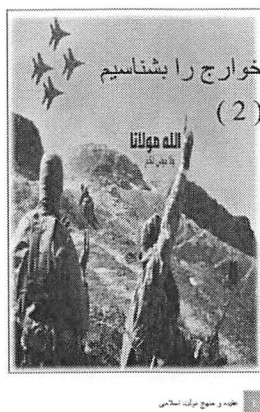
The image above depicts a man carrying an injured child. Below that image is a picture of a suicide vest with a hand holding the detonator. The Dari translates to: “Speech, the Verdict of Killing Infidels’ ‘Woman and Child’” written by Sheikh Abu Azam Al-Tamimi.



17. The picture above depicts the September 11, 2001, attack on the World Trade Center in New York City, New York. The image at the bottom is the ISIS media logo. The Dari portion translates to: “Operational Verdict of September 11; Penned by: Sheikh Hamood bin Aqila al-Shoaibi [PH]; [Seal of the Prophet] School of the Unitarians.” Sheikh Hamood bi Aqila al-Shoaibi, commonly known as al-Shu’aybi, was a Saudi-born Islamic scholar who supported multiple radical leaders including Usama bin Laden. The document has a subtitle in Arabic translated as “The Manhattan Raid, answers to the suspicions and critics regarding the 9/11 attack.”



18. The image above, including translation, reads, “Muhammad is Allah’s Messenger; [Seal of the Prophet repurposed by the Islamic State]; Guardianship in Islam; Author: Urban Mowahid al-Kurdi [PH]; The Kalifah of the Muslims Abu Bakr al-Husayni al-Baghdadi² (may God protect him); Minhaj al-Tahid Bookstore.”



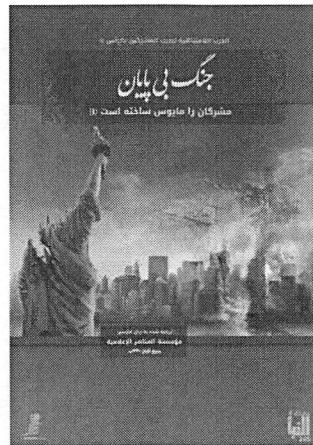
² Abu Bakr al-Husayni al-Baghdadi was the leader of ISIS until his death in 2019.

19. Translation of the image above reads, “Know the Apostate 2 – ISIS’s Belief and Method.” The images on the front page are consistent with extremist imagery. In 35 articles, the document spells out the ISIS’s core principles for its believers. It clearly defines what behaviors make a person Muslim, and what makes one a non-believer, even if they consider themselves to be a Muslim.

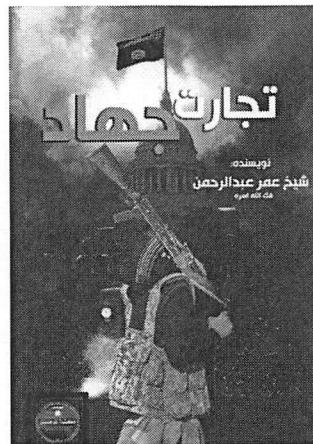


20. A review of the Google records for **TAWHEDI**’s account revealed an ISIS PDF in **TAWHEDI**’s email that identifies two ISIS-aligned Telegram channels, as well

as a PDF, pictured above, that depicts the ISIS flag and the “Dawla Islamiyya”³ logo.



21. The image above depicts a headless Statute of Liberty on the cover of a book written in Farsi. The book cover includes language, translated from Farsi, that reads, “Endless War has disappointed the disbelievers.” The book contains ISIS propaganda and advocates for ISIS’s position that ISIS wars have no end and will continue no matter what and that jihad is obligatory on everyone who can do it.



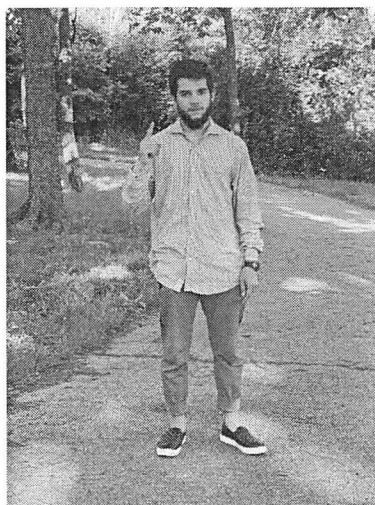
³ “Dawla Islamiyya” is another term for ISIS.

22. The image above depicts a militant carrying an AK-style rifle over his shoulder. In the background is a fire, smoke, rubble, and the United States Capitol building with an ISIS flag being flown above it. Translation of the writing reads, “The Trade of Jihad,” and the author is Sheikh Omar Abdul Rahman.⁴ This document encourages its audience to participate in holy jihad, calling it “the peak of Islam.”

23. Records provided by Google from **TAWHEDI**’s Gmail account included the following Google Photos:




⁴ Omar Abdel Rahman, the Egyptian-born “blind sheikh,” was convicted in 1995 of terrorist plots against the United States.



In the images above, **TAWHEDI** is displaying the “Tawhid” gesture in the same manner that ISIS militants pose. Multiple other photos were obtained showing **TAWHEDI** displaying the same “Tawhid” gesture.

24. Signaling tawhid is the gesture of raising one’s index finger to denote one’s belief in monotheism. Monotheism is a key component of the Muslim faith and is part of Islamic daily prayers. The raised index finger, or “tawhid finger,” is used by ISIS militants to signify the oneness of God in Islam. While this gesture is common among Muslims, ISIS uses it in other contexts to signal its support for acts of terrorism. More specifically, when ISIS uses this gesture, it is affirming their ideology that demands the destruction of the West and polytheism.

25. FBI also located an email in **TAWHEDI**’s Gmail account. TikTok sent the email to **TAWHEDI**’s Gmail account concerning **TAWHEDI**’s TikTok account. The image in the subject line (**TAWHEDI**’s TikTok username), , shows

“**TAWHEDI**” in Dari, a ninja emoji, and a black flag similar to the ISIS flag. TikTok has banned this account.

26. **TAWHEDI** previously contributed to a charity which fronts for and funnels money to ISIS. Specifically, in or about March 2024, **TAWHEDI** completed two cryptocurrency transactions resulting in a transfer of value of approximately at least \$540 to a Syria-based organization that engaged in an online fundraising campaign benefitting ISIS members and their supporters. The organization purported to support ISIS member dependents, including women and children, who are detained at the Al-Hol and Roj camps. As part of its fundraising, the organization made its cryptocurrency address available on pro-ISIS Telegram channels that include pro-ISIS propaganda and state support for ISIS’s goals.

27. FBI attributed the @Abu_Omir Telegram Account to **TAWHEDI**. On August 21, 2024, the @Abu_Omir Telegram Account sent “[CC 1’s first name] Akhi” Telegram messages that included a link to a Telegram account that resolved to a person who used the alias Abdul Malik (hereinafter “Malik”). In a prior investigation, FBI determined that Malik had facilitated recruitment, training, and indoctrination of persons who expressed interest in terrorist activity, including persons who wished to acquire firearms and engage in jihad and “operations.”

28. In addition to the Malik contact, **TAWHEDI** sent three other Telegram contacts to **CC 1**, one of which has been mentioned in at least five pro-ISIS Telegram groups, each time encouraging others to contact that pro-ISIS Telegram group.

**EVIDENCE OF TAWHEDI AND CC 1'S
CONSPIRACY TO COMMIT AN ATTACK**

29. As part of the investigation, JTTF executed a court-authorized search warrant for an Apple iPhone belonging to **TAWHEDI**. In searching the iPhone, the FBI reviewed the Telegram application installed on the device. FBI observed communications over Telegram between the @Abu Omir Telegram Account and Malik. The below communications occurred between on or about September 20, 2024, and September 25, 2024 (translated)⁵:

September 20, 2024

Malik: “Peace be upon you and God’s mercy and blessings. How did you buy it? What is the name of it? When do you do the work? No, we have a person, we bought weapons. How much did you pay for each?”

September 21, 2024

TAWHEDI: “We found a person who deals with weapons. He found it for us. They are smuggled. We bought two, they are Kalashnikovs. We are two people, we bought two. Each one costs \$1,200.00. Everything will perhaps be \$3,000.00 in total. We have ordered 500 bullets. What do you think, brother? Is it enough or should we increase it?”

TAWHEDI: “Also, I wanted to ask about the family, the family is coming in the near future, is there someone to guide them there, brother?”

September 22, 2024

⁵ FBI’s Language Services Section completed preliminary official peer-reviewed translations of the communications. These are subject to review and revision.

TAWHEDI: “Brother, our house was sold today. We’ll receive the money by the 15th of October, next month. After that we will begin our duty, God willing, with the help of God, we will get ready for the election day. Brother, what plan do have for our family? If not a problem, please introduce us someone who is online, so we could discuss all of the matters with them. May God reward you brother.”

TAWHEDI: “Afterall, brother, whatever you order, God willing, we will obey.”

September 25, 2024

MALIK: “Alright sweet brother. Thank you. Send the smuggler’s number and how to contact him to us as well. Secondly, your family that’s coming, who is accompanying them and how many people are there? Alright, from now on we will remain in daily contact God willing. Also send pictures of your weapons and how many magazines did you buy for each Kalashnikov? How much was your house sold for? Very good, donate the rest of the money to the Mujahideen and to the Bayt-ul-Mal [public treasury]. Rent a place when your family gets to Kabul. When your job is done we will bring this family to us and get them situated.”

TAWHEDI: “Brother, he is not a smuggler. When we listed the house for sale, we also put the house-hold goods for sale, this guy came and bought the TV and the computer. And then he said that he has a place near his house where we could go hunt and target practice. He said that they also have a weapon sales business. Then we went there for target practice one day and told him that we would like to buy two Kalashnikovs. We will buy just a few magazines from this guy so he doesn’t suspect us. Magazines are sold everywhere else, we will buy them elsewhere. If you need his number, I will send it to you.”

TAWHEDI: “He only has a telephone number, not WhatsApp or Telegram. We bought the things, we haven’t received them yet, they are on the way, maybe they will arrive by this week. I will send you the photos once they arrive.”

TAWHEDI: “We sold the house for \$185,000.00. It was my father-in-law’s. We will take the money for our expenses, but my father-in-law is not aware of

anything, because he won't be coming and if there is money left over, then we will give it, God willing.”

TAWHEDI: “The family is eight people. My mother-in-law, around 42 to 43 years of age, my wife, my one-year old daughter, three sisters-in-laws, my brothers-in-laws, one 13 years of age and the other 8 years of age. We have got tickets likewise.”

30. Based on my knowledge, training, and experience, ISIS and other FTOs use the word “work” to refer to terrorist attacks and other similar activity.

31. Based on my knowledge, training, and experience, “bayt-ul-mal” is the term ISIS, among others, uses to refer to its treasury.

32. FBI also observed on **TAWHEDI**'s device a contact under the name “[**CC 1's first name**] Akhi” in the Telegram account, which was associated with the phone number +1 XXX-XXX-7115, which FBI has attributed to **CC 1**.⁶

EVIDENCE OF TAWHEDI AND CC 1'S PLANNING FOR AN ATTACK

33. **TAWHEDI** and **CC 1** took steps to carry out the plan **TAWHEDI** and Malik discussed in communications exchanged by Telegram between September 20 and September 25, 2024. This plan involved liquidating their family's assets, acquiring two

⁶ On August 30, 2024, the Oklahoma City Police Department went to the Sunrise Drive residence, in reference to a previous report made regarding a stolen vehicle. FBI was also present during the interview. **TAWHEDI** and **CC 1** came to the front door. **CC 1** translated for **TAWHEDI**. **CC 1** verified that his telephone number is XXX XXX-7115 and that **TAWHEDI**'s telephone number is XXX XXX-8615.

AK-47 assault rifles, magazines, and ammunition, repatriating and resettling their family (excepting **TAWHEDI**, **CC 1**, and **CC 1**'s father⁷) to Afghanistan, providing ISIS mujahidin and "bayt-al-mal" money raised, in part, from liquidation of the family's assets, and completing the planned violent attack in the United States in the name of ISIS. The evidence shows that **TAWHEDI** and **CC 1** committed numerous acts in furtherance of their conspiracy, and their attempt, to provide material support to ISIS.

34. A search of **TAWHEDI**'s Google account revealed a series of searches conducted on July 25, 2024. One search was for "How to access washington dc cameras." In addition, the search showed that **TAWHEDI** visited the White House and Washington Monument webcams on July 25, 2024. **TAWHEDI**'s Google account also revealed searches on July 25, 2024, for "Which US state does not require relations to get a firearm?"; "Which US state does not require license to get a firearm?"; and "Which U.S. States Have Passed Permitless Carry Gun Laws?"

35. Starting in late August 2024, **TAWHEDI**, with **CC 1**'s assistance, sought to raise funds by liquidating the family's real and personal property. This property included the Sunrise Drive residence in Moore, Oklahoma, the family's two vehicles, furniture, electronics, and other personal property.

⁷ Based on all evidence available at this time, **CC 1**'s father has no knowledge of or involvement in **TAWHEDI** and **CC 1**'s plans to acquire firearms and ammunition or to engage in an attack.

36. On or about July 25, 2024, the Sunrise Drive residence was listed for sale at an asking price of \$230,000. This price was reduced by \$10,000 on August 1 and again on August 13, 2024. The residence was taken off the market on or about September 6, 2024, and re-listed with another agent on or about September 15, 2024, at a listing price of \$190,000. The house is currently under contract and pending sale with a closing date of October 15, 2024. The evidence suggests that **TAWHEDI** and **CC 1** were liquidating the family's property, in part, to raise funds to repatriate the family to Afghanistan.

37. Prior to sale of the Sunrise Drive residence, **TAWHEDI** and **CC 1** advertised sale of the family's personal property on Facebook.⁸

38. On September 3, 2024, at FBI's direction, a Confidential Human Source ("CHS 1")⁹ responded to the seller to inquire whether the HP Chromebook was still for sale. The seller responded: "Yes." CHS 1 asked whether the seller had any other

⁸ Specifically, on September 2, 2024, FBI identified through open-source research a Facebook account under a username that the FBI has attributed to **CC 1**. The Facebook account posted multiple items for sale on Facebook Marketplace, including an HP All-in-One Computer for \$450.00, and an HP Chromebook for \$225.00. Because **TAWHEDI** does not speak English well, **CC 1**, who speaks English well, assisted **TAWHEDI** by translating for **TAWHEDI** and interfacing with persons expressing interest in purchasing the family's property.

⁹ CHS 1 has been an a highly reliable source for the FBI for nearly nine years, with no handling concerns. Information provided by CHS 1 has been routinely corroborated through other investigative means over the years. CHS 1 has conducted controlled purchases of evidence items in the past, and has consensually recorded conversations with subjects on numerous occasions. CHS 1's principal motivations in working with law enforcement is patriotism.

electronics for sale. The seller responded: "I have a pc." CHS 1 responded: "Oh nice! How much for both?" The seller responded that the personal computer (PC) was "brand new" and he could "do it for 650." CHS 1 responded: "Oh that be [sic] awesome. Yes I will take them both[.] I need them for my new gun business I'm starting." The seller also offered to sell CHS 1 an iPhone 6 for \$70. CHS 1 stated he would also purchase the iPhone. The seller and CHS 1 agreed to meet on September 6, 2024, to complete the transaction at the Sunrise Drive residence.

39. On September 6, 2024, CHS 1 traveled to the Sunrise Drive residence to purchase the HP Chromebook, personal computer, and iPhone. **CC 1** and **TAWHEDI** greeted CHS 1 in the front yard. **CC 1** escorted CHS 1 inside the residence to look at the electronics. Towards the close of the September 6, 2024, meeting with CHS 1, **TAWHEDI** asked CHS 1 what he did for work. CHS responded that, among other things, he was starting a gun manufacturing business. **TAWHEDI** asked whether CHS 1 would be opening a store. CHS 1 said it would be "kind of like a store" but he would be manufacturing guns, and he was waiting on licensing. CHS 1 told **TAWHEDI** and **CC 1**: "I'm getting this for my gun business that I'm doing because I need computers to run the machines." CHS 1 purchased the PC, the Chromebook, and a chair for \$700. **CC 1** did not allow CHS 1 to purchase the iPhone 6 because he was unable to remove the SIM card. Before CHS 1 departed, **TAWHEDI** told **CC 1** in Dari to ask CHS 1 about acquiring firearms. **CC 1** asked CHS 1: "If you know anyone that sells, like, firearms

and stuff, and you're trying to get one. If you know any, just like." CHS 1 responded: "I know some people. I'll text you my number and you can text me."

40. On September 6, 2024, after CHS 1 departed the residence, CHS 1 sent CC 1 his cell phone number via Facebook messenger. CC 1 texted CHS 1 later that day from XXX-XXX-7115. In response, CHS 1 sent CC 1 a picture of a firearm and stated: "I build stuff like this."

41. On September 9, 2024, CHS 1 texted CC 1 to inquire about other items CHS 1 might wish to purchase, including a television. CC 1 offered to sell the television and invited CHS 1 to view it and purchase it the following day.

42. On September 10, 2024, CHS 1 traveled to the Sunrise Drive residence for the purpose of purchasing items (iPhone, a printer, wireless keyboard and a television). CHS 1 entered the residence and went to the second floor to review the items that were for sale. CHS 1 told CC 1: "You guys still need to come up to the ranch sometime and come shooting man. . . ya'll can come out any time you want. Yeah. Just let me know. It's a lot of fun out there. We have a pretty good gun range built out there." CC 1 asked CHS: "You gonna, like ah, shop like to fix guns and stuff?" CHS 1 responded: "Yep. I'm still waiting on my licensing. My partners already got theirs done. And they're gonna be here this weekend. Um, but so if you want to do buy anything. We can . . .they'll sell anything you wanna get." CC 1 asked: "So we order some online, do you guys have PFL like so we can send it to you guys?" CHS 1 responded: "Yeah. Oh yeah. . . . We can definitely help you out with that." CHS 1 suggests that CC 1 bring the

television with him when they visit his ranch. **CC 1** responded: “I don’t know if my brother’s going to come.” **CC 1** told **CHS 1**: “When I come just give me 460 dollars.” **CC 1** told **CHS 1**: “I will plan on Saturday.”

43. On September 14, 2024, **TAWHEDI** and **CC 1** met with **CHS 1** at a rural location located in the Western District of Oklahoma. Also present was a second **CHS** (“**CHS 2**”) and an Undercover FBI Employee (“**UCE**”). **CHS 2** and **UCE** posed as **CHS 1**’s business partners. **CHS 1**, **CHS 2**, and the **UCE** consensually recorded the meeting. During the meeting, **CHS 1** said he had firearms for sale, but none that he could provide at the time. The **UCE** told **TAWHEDI** and **CC 1** that he had some firearms with him they could test fire. The **UCE** asked **TAWHEDI**: “You shot a lot?” **TAWHEDI** responded: “Yeah. In Afghanistan, a lot.” **UCE** asked **CC 1**: “So you’ve shot before, have you shot?” **CC 1** responded: “Yeah, I did, with my dad in Afghanistan. . . . I shot a, what’s it called, with a handgun.” **TAWHEDI**, the **CHSs**, and the **UCE** discussed their experience with firearms and the merits of various makes and models. Ultimately, **TAWHEDI** expressed interest in purchasing two AK-47 assault rifles, magazines, and ammunition. They discussed a price and how long it would take to acquire the firearms. The **UCE** also brought out a shotgun, an AR-15, and a 9 millimeter for test firing. **CC 1** and **TAWHEDI** each used their iPhones to record videos of each other while shooting at the range. After spending time on the firing range, **TAWHEDI** confirmed his order with the **UCE** for two AK-47s. He specified he wanted two AK-47s with “under-folder”

stocks and wood grips. He and the UCE agreed to a price of \$1,000 each. He also ordered six magazines.

44. Since the September 14, 2024, meeting, **CC 1** has communicated by text with **CHS 1** and **UCE** to arrange a time and place to retrieve and pay for the firearms, magazines, and ammunition ordered from the **UCE**. The **UCE** later advised **CC 1** that he had received the AK-47 rifles and ammunition, and that he could be available to deliver them, accept payment, and test fire them. **TAWHEDI** and **CC 1** agreed they would meet **UCE** on October 7, 2024 to purchase the firearms and ammunition.¹⁰

45. The Telegram communications to Malik state that **TAWHEDI** is planning and preparing to repatriate the family, excluding himself, **CC 1**, and **CC 1**'s father, to Afghanistan. In furtherance of this stage of the plan, **TAWHEDI** and **CC 1** have committed a number of acts:

¹⁰ Evidence suggests **TAWHEDI** and **CC 1** shopped for firearms by other means. For instance, Google records from Tawhedi's search history show he visited "80 Percent Arms: 80% Lower Receivers & Firearm Accessories, May 20, 2022, 5:44:04 AM UTC" and also visited an online firearm dealer, placing in his shopping cart a Zastava Arms M70 ZPAP Underfolder Semi-Auto 7.62x39mm AK-47 Rifle, 16.3" Barrel, 1.5mm Receiver, Bulged Trunnion, 30+1, Walnut Handguard - ZR7762UF. In addition, on August 28, 2024, FBI reviewed T-Mobile telephone records for XXX-XXX-7115. On August 27, 2024, at 18:05:38 UTC an 81-second outgoing telephone call was placed to a gun store located in Oklahoma City. T-Mobile records also showed that on August 27, 2024, at 18:07:09 UTC, a 566 second outgoing telephone call was placed to the same gun store. The store owner reviewed the store's call log and located a telephone call received on August 27, 2024, at approximately 1305 hours CST from XXX-XXX-7115. Neither the owner nor the other employee remembered the telephone call.

- They have raised funds and made efforts to raise other funds by selling and placing on the market real estate, vehicles, and personal property belonging to their family;
- They purchased one-way airfare for travel to Kabul, Afghanistan, departing Dallas on October 17, 2024, for **TAWHEDI**'s wife and child, and **CC 1**'s mother and siblings, but not for themselves or **CC 1**'s father.
- They have found new homes for the family's pets.

**RECEIPT OF A FIREARM TO BE USED TO COMMIT A
FELONY OR A FEDERAL CRIME OF TERRORISM**

46. On October 7, 2024, **TAWHEDI** and **CC 1** met with **CHS 1**, **CHS 2**, and **UCE** at a rural location in the Western District of Oklahoma. The purpose of the meeting was to conduct the purchase of two AK-47 rifles, 10 magazines, and ammunition for use in their planned attack.

47. During the meeting on October 7, 2024, **TAWHEDI** and **CC 1** purchased, received, and took possession of two AK-47 rifles. Upon receipt of the AK-47 rifles and ammunition, **TAWHEDI** and **CC 1** were arrested.¹¹

¹¹ Because **CC 1** is a juvenile, further processing of **CC 1** is not addressed here.

TAWHEDI'S POST-ARREST INTERVIEW

48. Following his arrest on October 7, 2024, and pursuant to a knowing and voluntary waiver of his rights, **TAWHEDI** was interviewed and stated, among other things, that he planned to repatriate his family, to include his wife and child, and **CC 1's** mother and siblings (but excepting **CC 1's** father, who had no knowledge or involvement in **TAWHEDI** and **CC 1's** plans) to Afghanistan on October 17, 2024, where **TAWHEDI** believed they could live according to pure Islam. **TAWHEDI** further stated that he understood that the individual described above as Malik was affiliated with Dawla Islamiyya (which your affiant knows is another name for ISIS). **TAWHEDI** further stated that he and **CC 1** sought to obtain weapons and purchased the AK-47 rifles on October 7, 2024, for the purpose of conducting firearms training and committing an attack (using the firearms) on Election Day targeting large gatherings of people, during which he and **CC 1** expected to be martyred (i.e., die during the attack).

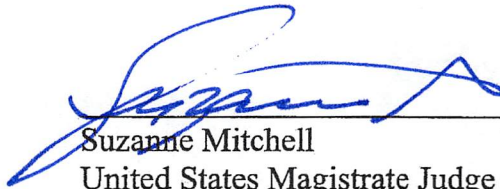
CONCLUSION

49. Based on the facts described above, I believe that probable cause exists to show that from in or about June 2024, until on or about October 7, 2024, in the Western District of Oklahoma, Nasir Ahmad **TAWHEDI** conspired to provide and attempted to provide material support to a designated foreign terrorist organization (ISIS), in violation of Title 18, United States Code, Section 2339B, and received and attempted and conspired to receive, firearms and ammunition to be used to commit a felony or a Federal crime of terrorism, in violation of Title 18, United States Code, Section 924(h).



Nathan Wilkins
Special Agent
Federal Bureau of Investigation

SWORN AND SUBSCRIBED to before me this 8th day of October, 2024.



Suzanne Mitchell
United States Magistrate Judge

CRIMINAL COVERSHEET

U.S. District Court, Western District of Oklahoma

Petty Misdemeanor Felony USAO No.: _____ Case No.: M-24-760-SM

Charging Document: Complaint No. of Defendants: 2 Total No. of Counts: 2 Sealed: Y

Forfeiture: Y OCDETF: Y McGirt: Y Warrant Summons Notice N
 N N N Companion Case No. (if any): A.Z.

DEFENDANT INFORMATION:

By: kh

Name: NASIR AHMAD TAWHEDI			
Alias(es):		Address: OKC, OK 73139	
		FBI No.:	
DOB: 1997	SSN: 2888	Race: White	Interpreter: Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Sex: M <input checked="" type="checkbox"/> F <input type="checkbox"/>	Juvenile: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Language/Dialect: Other Dari	

DEFENDANT STATUS/RECOMMENDATION:

PRIOR MAGISTRATE JUDGE PROCEEDINGS:

<input type="checkbox"/> Not in Custody	<input checked="" type="checkbox"/> Detention Requested	Complaint: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
<input type="checkbox"/> Type of Bond: _____		Magistrate Judge Case No.: MJ-
<input checked="" type="checkbox"/> In Custody at: <u>Pottawatomie County</u>		Previously Detained: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Inmate/Prisoner/Register No.: _____		

ATTORNEY/AGENCY INFORMATION:

<input type="checkbox"/> Public Defender <input checked="" type="checkbox"/> CJA Panel <input type="checkbox"/> Retained	Name: <u>Craig Hoehns</u>	AUSA: <u>PERRY/DILLON/STONEMAN</u>
	Address: _____	Agent /Agency: <u>FBI</u>
	Phone: _____	Local Officer/Agency: _____

CHARGING DETAILS

<u>Count(s)</u>	<u>U.S.C. Citation(s)</u>	<u>Offense(s) Charged</u>	<u>Penalty</u>
1	18 U.S.C. § 2339B	Providing, attempting to provide, and conspiracy to provide material support and resources to a designated foreign terrorist organization. +	NMT 20 years imprisonment; \$250,000 fine, o/b; S/R any term of years or life, \$100 SA
2	18 U.S.C. § 924(h)	Knowingly receiving, conspiring to receive, and attempting to receive firearms and ammunition to be used to commit a felony or Federal crime of terrorism. +	NMT 15 years imprisonment; \$250,000.00 fine, o/b; S/R NMT 3 years; \$100 SA

Signature of AUSA: /Jessica Perry

Date: 10/07/2024