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EMN/ZA/SDD:AAS/DMP
F.#2014R00196

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

NOELLE VELENTZAS and
ASIA SIDDIQUI, also known as
"Najma Samaa" and "Murdiyyah,"

Defendants.

-----X

TO BE FILED UNDER SEAL

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF ARREST WARRANTS

(18 U.S.C. §§ 2332a(a)(2))

EASTERN DISTRICT OF NEW YORK, SS:

NICHOLAS HANAK, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between May 2013 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOELLE VELENTZAS and ASIA SIDDIQUI, also known as "Najma Samaa" and "Murdiyyah," did knowingly and willfully conspire to use a weapon of mass destruction, to wit: an explosive device, against persons and property within the United States, and in furtherance of the offense facilities of interstate and foreign commerce, to wit: the Internet, were used.

(Title 18, United States Code, Sections 2332a(a)(2))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation and have been assigned to the New York Joint Terrorism Task Force ("JTTF") for approximately 4 years. As a Special Agent, I have investigated numerous matters during the course of which I have conducted physical surveillance, interviewed witnesses, executed court-authorized search warrants and used other investigative techniques to secure relevant information. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. The defendant NOELLE VELENTZAS is a 28-year-old United States citizen. The defendant ASIA SIDDIQUI, also known as "Najma Samaa" and "Murdiyyah," is a 31-year-old United States citizen. Until recently, VELENTZAS and SIDDIQUI were roommates in an apartment in Queens, New York. They continue to live in Queens, New York.

3. An investigation by the JTTF has revealed that VELENTZAS and SIDDIQUI are conspiring to prepare an explosive device to be detonated in a terrorist attack in the United States. In particular, SIDDIQUI is currently in possession of multiple propane gas tanks, as well as instructions for how to transform propane tanks into explosive devices. As discussed below, an undercover officer (the "UC") is in contact with both VELENTZAS and SIDDIQUI. However, SIDDIQUI has recently informed the UC that she will be disinclined to inform the UC regarding her progress in learning how to manufacture an explosive device.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

I. NOELLE VELENTZAS

4. The investigation has revealed that VELENTZAS espouses violent jihadist beliefs and has repeatedly expressed an interest in terrorist attacks committed within the United States.

5. In 2013, the UC met with VELENTZAS on multiple occasions. During these meetings, which were not recorded, VELENTZAS expressed violent jihadist ideology and an interest in terrorism. For example, VELENTZAS praised the attacks of September 11, 2001 and stated that being a martyr through a suicide attack guarantees entrance into heaven. According to VELENTZAS, a suicide bomber does not take her life; she gives her life in the name of Allah.

~~6. VELENTZAS repeatedly informed the UC that Usama Bin Laden and Bin~~
Laden's mentor, Abdullah Azzam, are VELENTZAS's heroes. VELENTZAS showed the UC her phone, which included as a background picture an image of Bin Laden holding an AK-47 gun, and played for the UC an audiotape of Bin Laden speaking. Additionally, VELENTZAS told the UC that terrorism is based on Islamic writings found in the Qur'an, and that Bin Laden's ideas, as manifested in his public letters, are similar to her own.

7. During meetings with VELENTZAS and the UC, SIDDIQUI stated that VELENTZAS has been obsessed with pressure cookers since the Boston Marathon attacks in 2013 and often makes comments about pressure cookers. VELENTZAS stated to the UC that she had recently received a pressure cooker as a present, and joked about cooking something in the pressure cooker, then laughed and added, "food"—a reference to explosive materials. For

example, VELENTZAS told the UC, “You can fit a lot of things in [the pressure cooker], even if it’s not food,” and then pointed to a thick rope and an axe in the vicinity of the pressure cooker.²

8. In June 2014, VELENTZAS told the UC that they needed to learn how to take someone’s weapon from them and how to fight multiple people at once. VELENTZAS told that UC that “if we get arrested, the police will point their guns at us from the back and maybe from the front. If we can get even one of their weapons, we can shoot them. They will probably kill us but we will be martyrs automatically and receive Allah’s blessings.”

II. ASIA SIDDIQUI

9. The investigation has revealed that SIDDIQUI also espouses violent jihadist beliefs and has expressed her interest in terrorist attacks committed within the United States.

10. SIDDIQUI has had repeated contact with members of the foreign terrorist organization Al Qa’ida in the Arabian Peninsula (“AQAP”)³ to offer her support. In these communications, SIDDIQUI has expressed support for AQAP’s violent jihadist cause.

11. In approximately 2006, SIDDIQUI became close with Samir Khan, who would later become a prominent figure of AQAP. While living in the United States, Khan started a Blogspot blog called “InshallahShaheed,” or “Martyr, God willing,” from his parents’ basement. After moving to Yemen, Khan became the editor of a magazine titled Inspire, through

² Except where otherwise indicated, excerpts of conversations are based on draft transcripts that are subject to revision and are set forth herein in sum and substance and in part.

³ AQAP is a militant Islamic organization, primarily operating in Yemen and Saudi Arabia. It was formed in January 2009 and formally designated a Foreign Terrorist Organization (“FTO”) by the United States Department of State on January 19, 2010. AQAP claimed responsibility for the attempted Christmas Day bombing of a Detroit-bound passenger plane from Europe in 2009 by AQAP member Umar Farouk Abdulmutallab. In a video released days after, AQAP addressed the American people, threatening to “come for you to slaughter, and we have prepared for you men who love death like you love life.” AQAP also claimed responsibility for an October 2010 plot to send explosive-laden packages on U.S.-bound cargo flights.

which AQAP disseminates AQAP propaganda and actively tries to recruit Muslims throughout the world – including in the United States – to join cause with AQAP. In an article published in Inspire called “I am proud to be a traitor to America,” Khan outlined his grievances against the United States. Khan also published a separate article titled “Make a Bomb in the Kitchen of Your Mom.” Additionally, Khan wrote a sixteen-page English-language manual titled Expectations Full, in which he addressed the difficulties of being a suicide bomber. The manual includes calls for attacks within the United States. Khan was killed on or about September 30, 2011 in Yemen.

12. In or about 2009, SIDDIQUI wrote a poem that was published in a magazine called Jihad Recollections, which was a predecessor of Inspire. I have obtained a copy of the poem, which is called “Take Me to the Lands Where the Eyes Are Cooled.” The poem calls for its readers to engage in violent jihad and to destroy enemies of Islam. For example, SIDDIQUI wrote that she “drop[s] bombs” as she swings on a hammock and “[h]it[s] cloud nine with the smell of turpentine, nations wiped clean of filthy shrines.” She also wrote that she “taste[s] the Truth through fists and slit throats” and that there is “[n]o excuse to sit back and wait – for the skies rain martyrdom.”

13. In a letter, SIDDIQUI expressed her support for Mohammad Mohamud, who was arrested on November 26, 2010 after he attempted to detonate a vehicle-borne improvised explosive device at a Christmas tree-lighting ceremony in Portland, Oregon. SIDDIQUI sent her letter to Mohamud soon after his arrest for the Christmas-tree bombing plot.

14. The FBI obtained a copy of the letter and the envelope in which it arrived at a Bureau of Prisons facility. The return address on the envelope is “Najma Samaa 9420 Guy R. Benson Blvd, Jamaica, New York, 11451.” This address is associated with York College,

SIDDIQUI's alma mater. The defendant signed the letter as "Murdiyyah."⁴ The letter was sent in or about September 2011. In the letter, SIDDIQUI wrote that Mohamud was "not forgotten in the Ummah's efforts and prayers."⁵

15. On or about July 10, 2014, FBI Special Agents interviewed SIDDIQUI at LaGuardia Airport in Queens, New York. During the interview, SIDDIQUI denied having any contact with Khan or other terrorists or terrorist groups and also denied contributing to or publishing in any jihadist magazines.

16. On the same date, shortly after her arrival at LaGuardia Airport, SIDDIQUI met with the UC. This meeting was recorded. I have reviewed the recording and discussed the conversation with the UC and the following is a summary, in part, of statements made by SIDDIQUI. SIDDIQUI stated that she had been questioned by FBI agents at the airport about Samir Khan, among other topics. She stated that she could not speak freely in the car because she believed the FBI had installed a "bug" in her computer. SIDDIQUI then whispered in a low voice that she knew Khan before he was deemed a terrorist. SIDDIQUI stated that, in 2006, she sent a poem to Khan's blog and/or website, which Khan then published. According to SIDDIQUI, this poem had become popular since its publication. Additionally, SIDDIQUI stated that she needed to go online and delete "stuff" from her email accounts.

III. The Defendants' Scheme

17. Since the FBI's interview with SIDDIQUI in July 2014, the UC has regularly met with VELENTZAS and SIDDIQUI. During meetings between August 2014 and

⁴ In a conversation with the UC on or about August 3, 2014, SIDDIQUI referenced an article that she had written under the name "Murdiyyah." In that article, SIDDIQUI referred to having written the poem in Jihad Recollections that is referred to above. Moreover, Facebook registration and IP address information obtained pursuant to a subpoena show that Facebook accounts in the names of "Najma Samaa" and "Murdiyyah" are both associated with SIDDIQUI.

⁵ "Ummah" is an Arabic word meaning "nation" or "community."

the present, some of which are referenced below, VELENTZAS and SIDDIQUI have discussed constructing an explosive device to be used in a terrorist attack in the United States. Unless otherwise noted below, all meetings involving the UC were recorded. I have debriefed the UC about these meetings and reviewed the consensually monitored recordings.

18. On or about August 6, 2014, the UC met with VELENTZAS and SIDDIQUI.⁶ During this meeting, VELENTZAS and SIDDIQUI discussed learning “science” in order to construct an explosive device. Specifically, VELENTZAS asked SIDDIQUI and the UC, “how about science?” In response to the UC’s request to clarify the meaning of that question, VELENTZAS motioned with her hands to simulate the explosion of a bomb and indicated in coded language that she was referring to learning how to make explosives.

VELENTZAS stated that many mujahedeen have lost fingers and limbs while making explosives and that the science of bomb-making is not necessarily simple. SIDDIQUI asked VELENTZAS whether VELENTZAS was good at science. VELENTZAS responded negatively and then instructed the others that in order to stay out of trouble they had to say “no” when they were asked questions like that.

19. VELENTZAS then cautioned SIDDIQUI and the UC about various ways that they could be caught while learning about making explosives. Specifically, VELENTZAS instructed SIDDIQUI and the UC to keep their voices down when discussing explosives because the government could have installed listening devices in “Muslim” establishments. VELENTZAS also instructed the others to be careful when consulting YouTube videos concerning the making of explosives, as such videos could be a way for the government to track activities of those interested in making explosives. VELENTZAS later stated that, if they were

⁶ The audio quality of the recording of this meeting is poor, and it is difficult to hear the defendants’ statements.

to practice together in VELENTZAS's backyard, a loud noise could tip off local law enforcement. VELENTZAS also provided the example of buying too many bottles of Clorox, which could seem suspicious and be reported to the NYPD.

20. On or about August 8, 2014, the UC met again with VELENTZAS and SIDDIQUI. During their conversation, VELENTZAS discussed other attempted plots to detonate explosives on American soil, including the 1993 World Trade Center bombing and the attempted bombing of the Herald Square subway station in Manhattan. VELENTZAS showed SIDDIQUI and the UC pictures from her cellular telephone of Adis Medunjanin and Ramzi Yousef, who were both arrested in domestic terrorist plots, and explained that their plans failed partly because they unknowingly provided information to government informants. Similarly, ~~VELENTZAS complained that the government had sent an Egyptian informant after an individual~~ who was planning an attack on the Herald Square subway station, and that the government "got" the individual because he was trying to scout out the location. VELENTZAS then asked the UC why the individual would attack the Herald Square subway station, and the UC responded, "Because there's a lot of people." VELENTZAS replied, "Yeah, but just regular people." Later that day, VELENTZAS expressed admiration for Mohammad Shnewer, who was "charged with quite an admirable thing . . . conspiring to attack Fort Dix in New Jersey." I believe that VELENTZAS, in these conversations, was expressing a preference for attacking military or government targets, rather than civilian targets.

21. In another conversation that same day, VELENTZAS stated that the federal authorities watch Muslim demonstrations and further stated, "It's war, it's fucking war." VELENTZAS then suggested that any authorities who might potentially be watching them would say, "How long is it going to take [these women to] realize that protest don't work? When are we going to see her going to Home Depot, what is she going to learn how to plant flowers?"

Yes, here they are. This one grows oregano, this one grows parsley, and this one cilantro, and this one grows the fruit of jannah (paradise).”

22. On or about August 13, 2014, the UC met with VELENTZAS.⁷

VELENTZAS said she thought about using the Internet on a pre-paid phone that could not be traced back to her, and asked the UC whether he/she would buy a pre-paid phone. When the UC said that he/she was not sure, VELENTZAS asked the UC, “Are we going to be scientists together?”

23. On or about August 17, 2014, SIDDIQUI and the UC went to a public library. SIDDIQUI stated to the UC that she remembered the conversation about “science” and that they should consult chemistry for beginners books at the library. At the library, SIDDIQUI looked up the on-line catalog for chemistry books for beginners, but stated that there were a limited number of books about chemistry.

24. On or about September 1, 2014, the UC met with VELENTZAS and SIDDIQUI at a park to review course books provided by SIDDIQUI from a course that she had taken on electricity. During this meeting, SIDDIQUI showed the others a passage on electrolytic capacitors and pointed to a sentence reflecting that connecting positive wires to negative receivers and negative wires to positive receivers can cause a fire or explosion. VELENTZAS questioned how to cause an explosion in this way without hurting themselves, unless they intended to do so—a reference to suicide bombing. However, VELENTZAS and SIDDIQUI implied that their goal was to learn how to blow up a bomb from afar rather than conduct a suicide bombing.

25. During the same meeting, VELENTZAS suggested that they needed to learn how the science behind explosives worked so that they would not be like Faisal Shahzad,

⁷ The recording equipment for this meeting failed to function properly.

who tried to blow up Times Square in Manhattan with a car full of explosives but was unable to detonate the explosives. VELENTZAS suggested that the group go to a Home Depot store in order to look at the items that they were reading about in SIDDIQUI's course books.

26. On or about September 7, 2014, the UC met with VELENTZAS and SIDDIQUI. SIDDIQUI told the UC that both she and VELENTZAS were reading her course books. In a discussion that lasted several hours, VELENTZAS explained what she was learning from the course books about transformers, alternating current and direct current, while referencing how to make a homemade grenade, a pipe bomb and a pressure cooker bomb, as well as the 1993 World Trade Center bombing.

27. On or about September 11, 2014, the UC met with VELENTZAS. VELENTZAS told the UC that she had seen a speech by President Obama about bombing ISIS and that she was disgusted by the United States and hated living in the United States. VELENTZAS stated that attacks on ISIS were tantamount to attacks on her own state.⁸

28. On or about September 24, 2014, the UC met with VELENTZAS. While driving past a hardware store on Sutphin Boulevard in Queens, New York, VELENTZAS pointed to a cooking pot in the window display of the hardware store and said, "Why the hell is the hardware store sell [sic] the pressure cooker? The devil is fucking with me."

⁸ The Islamic State of Iraq and the Levant ("ISIL") is a foreign terrorist organization that, since 2013, has claimed credit for numerous terrorist activities, including seizing Mosul, a city in northern Iraq, and rocket attacks on eastern Lebanon in March 2014. These terrorist activities are part of ISIL's broader goal of forming an Islamic state or "caliphate" in Iraq and Syria. On October 15, 2004, the United States Secretary of State designated ISIL, then known as Jam'at al Tawhid wa'al-Jihad, as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On May 15, 2014, the Secretary of State amended that designation to add the alias Islamic State of Iraq and the Levant as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham ("ISIS"), the Islamic State of Iraq and Syria ("ISIS"), ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production.

29. On or about October 13, 2014, the UC met with VELENTZAS. The UC stated that he/she had purchased a prepaid cellular telephone and a prepaid card for unlimited talk, text and data for one month. VELENTZAS was excited that they had obtained a phone that could not be traced to them. VELENTZAS commented that she was still working on getting her “electrical license,” referring to her recent efforts to learn electricity.

30. On or about October 24, 2014, VELENTZAS viewed on her cellular telephone YouTube videos about a beginner’s tutorial for soldering, tools and steps for soldering and de-soldering, how to solder wires together, how to solder a circuit board, common soldering mistakes, and introduction to flux, a product used in soldering tasks.

31. On or about the same date, VELENTZAS sent a text message to another individual asking him, “Can you go [to the] store and get flux.” The next day, the individual went to Home Depot, where he asked the employees about “flux” and was told that they are all the same. In a phone call, the individual then told VELENTZAS the flux was at VELENTZAS’s home, and VELENTZAS stated that she would check it out when she got home.

32. On or about October 26, 2014, the UC met with VELENTZAS. VELENTZAS instructed the UC not to use the prepaid phone until VELENTZAS had learned how to surf the “dark Internet.” I believe that the “dark Internet” refers to web sites that are not accessible by common search engines like “Google.” VELENTZAS instructed the UC to remove the battery and the SIM card from the prepaid phone when not being used. VELENTZAS told the UC that it was fine for the UC to look at “ideological videos” on the phone, but that the UC should not look up videos relating to “chemistry.”

33. Later that day, VELENTZAS pulled a knife from her bra and demonstrated how to stab someone to show SIDDIQUI and the UC what she would do if attacked.

VELENTZAS added, "Why we can't be some real bad bitches?" and stated that people needed to refer to them as "citizens of the Islamic State."

34. On or about October 30, 2014, the UC met with VELENTZAS.

VELENTZAS told the UC that she had learned about the "dark Internet." VELENTZAS instructed the UC in general to disassemble his/her prepaid phone in a large crowd so that the phone could not be traced back to the UC. VELENTZAS also told the UC that she was progressing in her electrical studies and had used a solder tool to solder copper wires together, although VELENTZAS had suffered a small burn on her finger in the process. The UC observed a burn mark on VELENTZAS's finger.

35. On or about November 2, 2014, the UC met with VELENTZAS and

~~SIDDIQUI. While VELENTZAS was reading a book called "Chemistry: The Central Science,"~~ the UC asked how this book was going to benefit them. VELENTZAS stated that they could practice at her house, but could not leave any residue. The UC stated that practicing at the house was not a good idea because the people living in the apartment below VELENTZAS might hear loud noises, referring to noises from explosions. VELENTZAS said that she could always tell her neighbors that she dropped some bookshelves. The UC and VELENTZAS then discussed the fact that the UC had downloaded The Anarchist Cookbook.⁹ VELENTZAS suggested that the UC print out the parts of the book that they would need. During the conversation, the UC stated, "We read chemistry books with breakfast. Like, who does that?" VELENTZAS responded, "People who want to make history."

36. On the same day, VELENTZAS, SIDDIQUI and the UC traveled to a pharmacy in Queens, New York. The UC and VELENTZAS went inside the store. The UC

⁹ The Anarchist Cookbook is a book, first published in 1971, that includes instructions for the manufacture of homemade explosives.

asked VELENTZAS whether they were looking for the vitamins they read about in the “health book” earlier, referring to the elements they read about in the chemistry book. VELENTZAS responded affirmatively and told the UC that they were looking for potassium. At VELENTZAS’s request, the UC then located a bottle of potassium gluconate.

37. After leaving the pharmacy, the group drove to a Home Depot store in Queens, New York. At the Home Depot store, VELENTZAS looked at copper wires, paint containers with the word “combustible,” small and large metal pipes, a bag of sodium chloride, and heater fluid containers. While looking at bags of manure, which she found in the gardening section, VELENTZAS commented that manure was an ingredient used in the Oklahoma City bombing.¹⁰

38. When they returned from the Home Depot store to VELENTZAS’s house, VELENTZAS spoke about the bag of manure from the gardening section and mentioned filling a vehicle with the manure. During that conversation, VELENTZAS discussed the possibility of renting a vehicle, as was done in the 1993 World Trade Center bombing.¹¹

39. On or about November 3 and 5, 2014, VELENTZAS viewed on her cellular phone product pages of explosive precursors, including racing fuel, stump remover, ammonium nitrate and nitromethane. Additionally, VELENTZAS accessed forums titled “Where Does Electricity Go?” and “Cold Explosions,” which discusses explosions resulting from ammonium nitrate and water.

40. On or about November 11, 2014, VELENTZAS viewed on her cellular phone an eHow article titled, “What is Miracle Gro Made Of,” and a web page called “What Is

¹⁰ The bomb used in the Oklahoma City bombing consisted of ammonium nitrate, which is found in manure, and nitromethane.

¹¹ The bombers who attacked the World Trade Center in 1993 used a rented van as the vehicle for their truck bomb.

Miracle Gro?” As discussed below, fertilizer is sometimes an ingredient used in homemade explosives.

41. On or about November 11, 2014, the UC met with VELENTZAS, who had an open bag of Miracle Gro fertilizer with her. VELENTZAS stated that she was growing her plant, while winking at the UC. VELENTZAS explained that the Miracle Gro contained potassium, magnesium and ammonium nitrate.¹²

42. During the conversation, VELENTZAS referred to a picture on the home page of her cellular telephone of Yahya Ayyash, a notorious bomb maker for the foreign terrorist organization Hamas, who was killed in 1996. VELENTZAS chided the UC for not having yet read The Anarchist Cookbook and told the UC that they had to become knowledgeable about weapons rather than waiting for something to happen. VELENTZAS stated that all Muslims, especially those who believe in an Islamic caliphate, should have knowledge about weapons.

43. On or about November 20, 2014, the UC met with VELENTZAS.¹³ While watching videos of ISIS members beheading Syrian soldiers, VELENTZAS stated that they should not be upset that they live in a country that commits crimes against Muslims because “jannah” (paradise) lies through the “flesh of the kufar (infidels).” VELENTZAS said that she will continue to study, as it is the right of a Muslim to learn how to protect oneself while trying to spread the truth.

44. While watching another video in which pro-ISIS French foreign fighters urged others to leave their countries to fight with ISIS, VELENTZAS asked whether the UC still had the PDF file—referring to The Anarchist Cookbook. The UC responded affirmatively and

¹² The recording equipment for this meeting failed to function properly.

¹³ Due to a malfunction with the recording equipment, the conversations described below between November 20, 2014 and November 30, 2014 were not recorded.

indicated that he/she had printed the relevant portions for the group. VELENTZAS also stated that Inspire magazine was useful for the UC to learn how to “valet” his/her car and how to cook “food,” which I believe are coded references to car explosives. VELENTZAS referred in coded language to the extraction process of separating elements for bomb components. VELENTZAS remarked that what “the White guy” did was easy. When asked by the UC to identify the “White guy,” VELENTZAS whispered “Oklahoma.” I believe that VELENTZAS was referring to one of the Oklahoma City bombing conspirators. VELENTZAS then showed the UC a photo of a large explosion, which she described as showing ISIS blowing up a gas pipe between Egypt and Israel. VELENTZAS said that the photo was beautiful and that it looked like the sun. Before the UC left, VELENTZAS reminded the UC to download Inspire magazine on his/her “research phone,” referring to the UC’s prepaid phone.

45. On or about November 23, 2014, VELENTZAS asked the UC if he/she recently visited the library—a reference to the defendants’ ongoing bomb research. The UC responded negatively but indicated that he/she had printed The Anarchist Cookbook, which was inside a bag in the car. VELENTZAS asked whether the UC had printed Inspire magazine. The UC responded negatively but indicated that he/she had downloaded it as a PDF file. VELENTZAS stated that she never downloaded Inspire magazine because the government might “watch” people who downloaded the magazine.

46. VELENTZAS later retrieved a bag containing The Anarchist Cookbook and started to read it. The UC indicated that he/she had bookmarked the part that they previously discussed (regarding the fertilizer bomb) by folding the corner of the page. VELENTZAS turned to that page and said that was what “that guy” used. In response to the UC’s question of whether VELENTZAS was referring to the “O guy” (a coded reference to one of the Oklahoma City bombing conspirators), VELENTZAS responded affirmatively.

47. Later that day, VELENTZAS, SIDDIQUI and the UC went to dine together. While eating, VELENTZAS stated that she wanted to study The Anarchist Cookbook and asked to keep it. VELENTZAS then asked if SIDDIQUI and the UC wanted to study with her. SIDDIQUI remarked, "I love your enthusiasm." VELENTZAS responded, "What enthusiasm? We must study this because they are killing Muslims." SIDDIQUI told VELENTZAS that her remark was intended as a compliment and that her own seeming lack of enthusiasm should not be mistaken for lack of interest.

48. VELENTZAS and the UC then discussed what they were ultimately trying to accomplish with their studies. VELENTZAS said they do not need a plan because plans are foiled or stopped. According to VELENTZAS, it was premature to discuss the plan and that, if the appropriate time arises, they would know. Later, VELENTZAS explained that she would never want to hurt anyone but, as a Muslim, she must acquire this knowledge and be ready. VELENTZAS commented that the kufar (infidels) have this knowledge and use it to hurt Muslims, and so the group needed to be prepared. VELENTZAS then told the story of Yahya Ayyash and how he took action after a Jewish man came into a mosque and shot up Muslims while they were praying. VELENTZAS remarked that Ayyash's actions helped the Palestinians maintain control of the Gaza Strip. According to VELENTZAS, when Allah decides the time, they will know whether one person, or two people, needs to act. She went on to state that at this juncture, they did not need to have these talks because it was too early.

49. On or about and between November 23, 2014 and December 8, 2014, VELENTZAS used her cellular phone to research whether the UC was, in fact, an undercover officer and to learn how to detect the presence of hidden recording devices. During this time period, VELENTZAS accessed approximately 40 Internet web pages on these topics, including researching following titles on various websites: "Learning the Identity of a Confidential

Informant,” “Identifying Informants/undercover police,” “Informants, Bombs, and Lessons,” “How to Spot Undercover Police,” “Is S/he an Informant? A Ten Point Checklist,” “Bug and Tap Detectors Rf Detectors Wireless Camera Detector Bug Detectors,” and “detect recording device.” VELENTZAS also accessed and watched a video titled “How to Use a Spy Camera and Bug Detector Sweeper.” Additionally, VELENTZAS used her cellular phone to conduct numerous background searches on the name she associated with the UC.

50. On or about November 24, 2014, the UC visited VELENTZAS.

VELENTZAS had The Anarchist Cookbook open, as well as a notebook with handwritten notes. When VELENTZAS began to talk about The Anarchist Cookbook, VELENTZAS removed the SIM card from her cellular phone and asked the UC for his/her phone. The UC then removed the SIM card from his/her phone. While VELENTZAS momentarily left the room, the UC photographed The Anarchist Cookbook, VELENTZAS’s notes on homemade explosives, and VELENTZAS’s phone with the SIM card removed. When VELENTZAS returned, she stated that there are ways the government can tap into their phones and listen to conversations so she wanted to make sure the SIM cards were removed before she began to explain how different components react to each other. VELENTZAS then stated that explaining these things is “not exactly legal.” According to VELENTZAS, potassium chloride can be turned into potassium chlorate, and sulfuric acid can be dangerous. VELENTZAS opened a section on “Nitroglycerin” in The Anarchist Cookbook and spoke about the necessity of keeping acid in a container inside of a bathtub filled with ice. According to VELENTZAS, the ice must be refilled frequently. VELENTZAS stated that many of the components she discussed are highly dangerous and that the acid will burn through the skin and clothes. VELENTZAS also said that, if they were ever to combine any of these components, which she characterized as highly dangerous, they would need to wear protective gear like a mask and gloves.

51. After VELENTZAS asked the UC what caught his/her eye in the book, the UC stated the fertilizer bomb was the easiest, and that detergent and acetone is an easy combination. VELENTZAS said Hamas had employed the method of combining detergent and acetone many times. VELENTZAS mentioned that she knew of a man in Saudi Arabia who makes explosive vests that a user could detonate just by scratching them like a matchbox. VELENTZAS thanked the UC for bringing the book, referring to The Anarchist Cookbook, and asked him/her to print other books, mentioning that Inspire magazine provides very easy instructions. VELENTZAS instructed the UC to destroy the printout of The Anarchist Cookbook once they learned the necessary materials.

52. Later that day, VELENTZAS again referred to Faisal Shahzad, the ~~would-be Times Square bomber, and expressed her concern that she did not want to be like him~~ because his bomb did not detonate. VELENTZAS then stated that they needed to learn how to cook a lot of “food”—a reference to mixing chemicals to make explosives. When making that statement, VELENTZAS opened her eyes wide to signal that she was speaking in code. VELENTZAS told the UC to bring back the book, referring to The Anarchist Cookbook, next time the UC visited.

53. On or about November 30, 2014, the UC visited VELENTZAS and SIDDIQUI. During the conversation, someone used the word “inspire.” VELENTZAS asked, “Speaking of which, did you get it?” I believe this was a reference to whether the UC had printed Inspire magazine, as VELENTZAS had previously requested. After the UC responded negatively, VELENTZAS reminded the UC that his/her monthly Internet card would expire soon. The UC promised to print the magazine soon.

54. The group then went to eat. VELENTZAS referred to cooking and stated that cutting food into really small particles would yield a lot more food. I believe this was a

reference to making a bigger explosion. VELENTZAS later added that the “finer” a substance, the “purer” it becomes for mixing purposes. VELENTZAS also commented about where to get diesel fuel, which is one of the components that VELENTZAS read about in The Anarchist Cookbook in the section on making a fertilizer bomb.

55. VELENTZAS later stated that they must study to the point that they will retain the information without any book to consult, including knowing how much of each substance was needed to make a fertilizer bomb. This task, VELENTZAS explained, was not easy. On the way to the car, VELENTZAS spoke about hydrochloric acid and stated that, in the back of The Anarchist Cookbook, there is a list of common household items containing the substances they had spoken about.

56. On or about December 2, 2014, VELENTZAS viewed on her cellular phone product pages for a hydrometer and bleach, which are two components listed in The Anarchist Cookbook as ingredients for “Making Plastic Explosives from Bleach.” She also viewed a forum titled “Where to buy a good hydrometer?”

57. On or about December 21, 2014, VELENTZAS and the UC discussed the recent murder of two New York City Police Department officers in Brooklyn. VELENTZAS stated that the murder showed that it was easy to kill a police officer. She added that killing a police officer is easier than buying food, because sometimes one has to wait in line to buy food.

58. On or about December 24, 2014, the UC visited VELENTZAS and brought the Spring 2014 issue of Inspire magazine, as previously requested by VELENTZAS. VELENTZAS then sat down to “study” the magazine and spent several hours reading an article titled “Car Bombs Inside America.” VELENTZAS took notes in her notebook on how to make a car bomb. VELENTZAS also asked the UC to make a copy for her of “that information,” referring to the pages of Inspire magazine containing the article about car bombs.

59. On or about the same day, the UC asked VELENTZAS what was the most practical option out of all the options that they had studied. Before engaging in a substantive conversation of this topic, VELENTZAS said that they should take their phones to another room, which they did. After resuming their conversation, VELENTZAS stated that it would be easier to build a nitroglycerin bomb than to buy six gas cylinders. However, VELENTZAS suggested that there were problems acquiring the materials. VELENTZAS gave a lesson to the UC about security when trying to buy explosive materials. VELENTZAS stated that because they were Muslims, it is hard for them to buy certain items, because they could get in trouble with the "feds." VELENTZAS stated that "if I was to go buy a chemical fertilizer and I don't have any plants [to purchase], I will be like [to workers at Home Depot], 'Because I got plants, why else?'"

VELENTZAS also stated to the UC that they should not keep the explosive materials lying around the house once they purchased them. Instead, they should only buy materials they intended to use right away. VELENTZAS later stated, "You have to light it and walk away."

60. During the same conversation, VELENTZAS and the UC talked about potential targets in discussing the Boston Marathon bombing. VELENTZAS stated that the bombers had erred in attacking regular people. VELENTZAS stated that if so much time and effort is spent on studying, it is better to go for the enemy directly rather than people who are getting drunk or running in a marathon. VELENTZAS stated that it would be better to attack "the head, the neck, the shoulders" of the "snake" (i.e., enemy), referring to those who would harm Muslims, but not "the tail." VELENTZAS described her intended attack as follows: "This is what it looks like. 'In your face, nigger. Oh, you're dead.'"

61. On or about December 27, 2014, the UC met with VELENTZAS and SIDDIQUI. The UC again brought the Spring 2014 issue of Inspire magazine. During this meeting, VELENTZAS stated the she and SIDDIQUI had previously studied The Anarchist

Cookbook together. SIDDIQUI showed the others a notebook in which SIDDIQUI had taken several pages of notes while she and VELENTZAS were studying The Anarchist Cookbook. One page of notes explained how to heat up and prepare a mixture of bleach and potassium chloride; a second page of notes was about nitric acid; and a third page of notes was about nitroglycerin. VELENTZAS, SIDDIQUI and the UC also studied the instructions for building a car bomb contained in Inspire magazine. SIDDIQUI stated that, "I need all of us to be on the same page if we want to do it I want to clearly understand the steps." She added, "We all need to have our own notes." VELENTZAS responded that they needed to learn the steps so that they could put the notes away and still know what to do.

62. During that meeting, the UC noted that there had been more than 25,000 police officers together in one place at the funeral for Officer Rafael Ramos, a New York City Police Department officer who was killed while sitting in his police vehicle. VELENTZAS complimented the UC on coming up with an attractive potential target. VELENTZAS asked the UC several times if there were any "regular people" at the funeral and how far away they were from the police during the funeral. Based on these statements, I believe that VELENTZAS was trying to evaluate whether a police funeral was an appropriate terrorism target.

63. On or about December 30, 2014, the UC provided SIDDIQUI with a copy of the pages of Inspire magazine containing the article about car bombs, which VELENTZAS had previously asked the UC to copy for her. The UC asked SIDDIQUI to give the pages to VELENTZAS, and SIDDIQUI responded that she would.

64. On or about January 18, 2015, VELENTZAS described for the UC a video that VELENTZAS had watched of a 20-year-old man conducting a suicide bombing in a truck in either Syria or Iraq. VELENTZAS stated that the explosion looked like a nuclear blast with a mushroom cloud on top, describing it as "so cool" and the "best video on the Internet."

VELENTZAS commented that the Islamic State always used the same type of detonator, and that it appeared to be the kind of detonator from a grenade attached to a wire that could be detonated by pulling the grenade pin.

65. On or about January 19, 2015, VELENTZAS viewed on her cellular telephone an article on the web page for CBS New York entitled “Schumer to Introduce Bill That Would Outlaw Homemade Explosives,” as well as various articles providing an overview of the planned legislation to outlaw homemade explosives.

66. On or about January 22, 2015, VELENTZAS told the UC that she never stopped studying. VELENTZAS stated that she studied the basics of chemistry, that she had read through all of The Anarchist Cookbook, and that she had compared what she read in The Anarchist Cookbook to what she had learned from chemistry textbooks to make sure that the information matched up. VELENTZAS also stated that she had a dream in which she lifted a blanket off of a skeleton, and interpreted this dream as practicing a certain type of science. When the UC asked what type of science, VELENTZAS responded, “What do you think? There is only one type of science that would mean that.”¹⁴

67. On or about January 25, 2015, while going to a store with SIDDIQUI and the UC, VELENTZAS stated that she thought the store might sell Christmas lights.¹⁵ VELENTZAS then raised her eyebrows and stared directly at the UC. The UC believed that VELENTZAS was referring to instructions from Inspire magazine about how to build a car bomb with a decoration light as a component. Later the same day, at VELENTZAS’s residence,

¹⁴ This portion of the conversation was not recorded because the recording equipment captured only part of the conversation.

¹⁵ Only a portion of this conversation was recorded because of equipment malfunction.

VELENTZAS, SIDDIQUI and the UC studied their chemistry notes. VELENTZAS stated that they needed to be careful because the information that they were studying could land them in jail.

68. On or about January 27, 2015, VELENTZAS used her cellular telephone to view a web page titled "10 Random Liquid Nitrogen Experiments."

69. On or about February 3, 2015, the UC met with VELENTZAS. VELENTZAS talked about her recent areas of study, which included chemistry and physics. On the subject of chemistry, VELENTZAS spoke about elements hydrogen, helium, chlorine, sodium, aluminum, carbon, iron and potassium. VELENTZAS discussed elements that are oxidizers, and commented that sodium, aluminum and potassium are reactive elements. In particular, potassium could be used in different mixtures and aluminum "gives your shit wings . . . that's how reactive it is." During the conversation, after being asked by the UC why the Quran was on top of the pressure cooker, VELENTZAS responded, "I don't know . . . Freudian slip."

70. VELENTZAS then asked the UC what he/she had been studying. The UC stated that he/she had watched a video showing how to make a detonator to ignite fireworks. After VELENTZAS asked the UC which phone was used to conduct this research, the UC stated that he/she had used his/her own phone. VELENTZAS warned the UC not to use a personal phone to look up this information and stated that the wireless carrier at issue voluntarily shares information with the government.

71. VELENTZAS described her interest in understanding how to connect wires to a phone. Although there are "a couple of things you can solder your wires to, but I am saying to myself, is it for the volume when it's going to ring, that part, is it for the light when it lights the screen, that part, you know, does it matter? Those are the type of questions I am asking myself." VELENTZAS then stated that the government could be surveilling them and preparing a case. VELENTZAS characterized SIDDIQUI as having a "beef" with the government, the UC as an

inconspicuous student studying about detonators, and herself as an outspoken political person who studies a lot of science and is very intelligent. “You got the beef, I got the knowledge, you got the mechanics . . . that’s how it looks on paper.” “On paper,” the UC therefore is a Muslim with two “terroristic-ass friends.” Although describing herself as a “peaceful person,” VELENTZAS stated, “I like to know how to defend myself, because I feel that the people that control things are very fucked up people . . . that become corrections officers, and that become public defenders, I mean prosecuting attorneys, that become homeland security, and these are fucked up people – They’re kufar. . . . But reality is, is that these people are violent and are fucked up and you are living in a war that is against your religion.” VELENTZAS warned that “if [the government] was to put all the information about the three of us together, we legitimately, to these people, look like a cell.”

72. VELENTZAS again warned the UC not to use his/her phone to look up fireworks. VELENTZAS stated, “I did not know people did that with fireworks, man. I am going to cause some fireworks.” VELENTZAS told the UC to study his/her “notes” (a reference to The Anarchist Cookbook or Inspire magazine) because the UC already has the “techniques these people are using.” VELENTZAS stated, “We are living Al-Malahama, that’s the last war, the big war before the end of day starts, in English they call it Armageddon, we are actually living in that time, it’s not a joke, it starts in Syria.”

73. After the UC stated that he/she was “not sure how I am going to use this knowledge, but I know that eventually I am going to use this knowledge,” VELENTZAS replied, “MashAllah.”¹⁶ VELENTZAS described her existence as an “awake person in a mental concentration camp . . . it is a very lonely path.” She added, “I might get old here and be able to put a lot of people onto wisdom and reason or I’m going to be in solitary confinement, and get

¹⁶ “MashAllah” is an Arabic phrase for “God has willed it.”

raped or tortured, or I'm going to be killed in the street. That is your future in America." She then stated, "I already have my mind set up that I only see three outcomes for my future." She listed the options as becoming a grandmother, shahada (death), or solitary confinement.

VELENTZAS wanted the freedom to love the Islamic State and "unfortunately you have to back up freedom with something."

74. On or about February 9, 2015, VELENTZAS sent a text message to the UC with a link to a web page titled "Countering Violent Extremism: A Guide for Practitioners and Analysts."

75. In a telephone conversation on February 10, 2015, VELENTZAS spoke about the explosive qualities of aluminum: "If they . . . do something to it called oxidation, you know, hard so you can use it as a container, but aluminum without being oxidized is very reactive like you can't even put it in water, I don't think. I know about water but you know a lot of things you can't put it in because it is dangerous. And aluminum pan even especially if you scratch it -- if you put it in ammonia -- it starts to release hydrogen. So aluminum is a very reactive element."

76. On or about February 15, 2015, VELENTZAS and the UC spoke about acetone peroxide. After SIDDIQUI joined the conversation, VELENTZAS discussed how they could get acetone. She stated that "there is only like 8% acetone in the bottle and the rest is water." VELENTZAS asked, "how do you separate that . . . from the water effectively so you get the powder?" When the UC stated that it needs something to "harden it up," VELENTZAS interrupted and said, "I think that's what the hydrochloric acid is for." Later in the conversation, VELENTZAS returned to the subject of hydrochloric acid. The UC asked how to get hydrochloric acid. VELENTZAS responded, "I think that people don't buy directly hydrochloric acid. I think they buy other stuff with hydrochloric acid in it and then they have to

do the same redundant thing of separating it from the rest of the stuff.” VELENTZAS then commented, “Shit ain’t easy.” VELENTZAS observed that “you’re better off with gases or stuff you can just fertilize,” and began discussing nitroglycerin and sulfuric acid.

77. On or about February 17, 2015, the UC and VELENTZAS drove past the Home Depot store that they had previously visited in Queens, New York. VELENTZAS laughed about asking the Home Depot employee where she could find propane, and then telling him that she was going to have a barbecue. VELENTZAS stated, “Some women like to look at clothes. I like to look at electric equipment.”

78. On or about February 22, 2015, the UC and VELENTZAS arrived at SIDDIQUI’s residence, where they met with SIDDIQUI. The UC indicated that she had recently read an article about three British schoolgirls who travelled to Syria to join ISIS and stated, “This could be us but we old and she married” (while pointing to VELENTZAS). VELENTZAS responded, “You never know, there is other ways. . . . There’s other ways to do that.”

79. While VELENTZAS and the UC were in the stairwell leading to SIDDIQUI’s basement apartment, VELENTZAS pointed to four propane gas tanks and asked, “What’s this my nigga, what’s this? Look at my nigga right here. Look at my nigga.” When asked what she was referring to, VELENTZAS responded, “Everything.” SIDDIQUI then stated, “I got everything.” When asked if the containers were propane, SIDDIQUI stated, “I got everything up in this joint, I already told you. If you guys . . . once we learn . . . I got everything up in this joint.” After the UC pointed to a cylinder and asked what it was, VELENTZAS responded, “That’s a torch.” The UC stated, “Yo, she got everything. This is like the Home Depot.” VELENTZAS added, “The Home Depot where they don’t ask you what you want to buy.” When asked why she had not mentioned this equipment before, SIDDIQUI insisted that

she had previously told VELENTZAS and the UC about this equipment. VELENTZAS stated, “She’s the master of not telling you shit that’s really important” and “tell the doctor to give [SIDDIQUI] communication pills.”

80. After they left SIDDIQUI’s residence, VELENTZAS and the UC discussed the materials in SIDDIQUI’s basement and SIDDIQUI’s communication skills. In particular, VELENTZAS commented that they have to “keep it a hundred,” referring to trusting each other: “Cause how could you have a . . . have a open conversation about some shit that is uhm . . . federal-time worthy shit and the person . . . you know . . . is . . . half-ass in communication? Nigga, I’m gonna die for your ass and you don’t communicate?”

81. On or about March 1, 2015, the UC met with SIDDIQUI at SIDDIQUI’s residence. During the meeting, the UC asked SIDDIQUI why the group had gone to Home Depot when, in fact, SIDDIQUI had materials at her house. SIDDIQUI indicated that, at the time, her brother was living in her current residence, “so I wasn’t trying to have us come up in here.” After retrieving a notebook hidden in her bedroom dresser, SIDDIQUI stated that she had not provided VELENTZAS with the car bomb instructions from Inspire magazine that the UC had given to SIDDIQUI at the end of December 2014 in order to give to VELENTZAS. SIDDIQUI explained, “I wanted to look at it myself, I won’t lie.” The UC observed the car bomb instructions from Inspire magazine inside a pocket in SIDDIQUI’s notebook. After the UC observed that the car bomb instructions called for components similar to what SIDDIQUI already had at her residence, SIDDIQUI read aloud from the instructions: “Air cylinder, barometer . . . cooking gas . . . hmm, we can look up . . . air cylinder.” SIDDIQUI then stated that they should determine “other names” for “air cylinder.”

82. After the UC observed that VELENTZAS and SIDDIQUI had not studied with the UC since SIDDIQUI moved out of VELENTZAS’s residence, SIDDIQUI stated, “Trust

me, I have all these books [VELENTZAS] would want to look at,” including her brother’s organic chemistry books. SIDDIQUI continued, “I learned how to have wisdom. You have to . . . if you have to be so discreet that you won’t have to tell anyone, so be it.” When the UC asked “how do we get to that point,” SIDDIQUI interrupted, “You can’t say ‘we.’ . . . I don’t think you’re getting me.” SIDDIQUI explained that the three of them would have to carry out their independent planning: “If other people don’t have discipline, the one who does has to keep moving forward.” I believe SIDDIQUI indicated that she will not necessarily inform the UC of progress in her own studies on explosives, notwithstanding the fact that she is currently in possession of instructions as to how to transform propane gas tanks into bombs.


83. On or about March 22, 2015, the UC met with SIDDIQUI at SIDDIQUI’s residence. During a conversation about co-existing with non-Muslims, SIDDIQUI stated, “How do I co-exist when I’m constantly saying . . . ‘I’m all about jihad,’ you know what I mean?” The UC and SIDDIQUI subsequently met with VELENTZAS. VELENTZAS showed SIDDIQUI and the UC two videos on her cellular telephone. The first video showed aluminum and iodine being mixed together. VELENTZAS stated that both of those substances could be purchased in a supermarket, and used her hands to simulate an explosion. The second video showed lithium from a cellular telephone battery being exposed to air and catching on fire. VELENTZAS suggested putting the lithium with something combustible to create a larger explosion.

84. On or about the same day, the UC asked VELENTZAS whether she had heard the news about a U.S. airman who was arrested after trying to travel to Syria to wage jihad.¹⁷ VELENTZAS and Tairod Pugh have been “Facebook friends” since August 2014.

¹⁷ I am aware that Tairod Pugh, a former member of the United States Air Force, was arraigned in federal court in Brooklyn on March 18, 2015, on an indictment charging him with attempting to provide material support to ISIL.

VELENTZAS responded that she did not understand why people were traveling overseas to wage jihad when there were more opportunities of "pleasing Allah" here in the United States.

WHEREFORE, your deponent respectfully requests that the defendants NOELLE VELENTZAS and ASIA SIDDIQUI be dealt with according to law. I request the Court's permission to enter VELENTZAS's and SIDDIQUI's apartments without prior notification of law enforcement's presence in order to execute their arrests. As set forth above, VELENTZAS has stated that if she is arrested she will try to grab a weapon and die as a martyr, discussed how easy it would be to kill a police officer, showed SIDDIQUI and the UC how to stab someone with a knife that VELENTZAS carried in her bra, and possesses a knife and axe inside her residence, while SIDDIQUI is in possession of explosive devices, such as the propane gas tanks, as well as instructions for assembling explosive devices. I further request that this affidavit and the arrest warrants be filed under seal as disclosure of this application would give the defendants an opportunity to destroy evidence, harm or threaten victims or other witnesses, change patterns of behavior, notify confederates, and flee from or evade prosecution.



NICHOLAS HANAK
Special Agent
Federal Bureau of Investigation

Sworn to before me this
1st day of April, 2015

THE HONORABLE VIKTOR V. POJORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK