

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

Jackie Rahm LITTLE,
a/k/a Joel Arthur Tueting,

Defendant.

Case No. 23-mj-365 (ECW)

FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Special Agent William F. Fulton III, being duly sworn, do hereby state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a Criminal Complaint alleging the defendant, Jackie Rahm LITTLE (a/k/a Joel Arthur Tueting, hereinafter "LITTLE"), violated Title 18, United States Code, Section 844(i) (Arson). As set forth below, there is probable cause to believe that LITTLE maliciously damaged a mosque by fire.

2. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws. I am a Special Agent of the United States Justice Department, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), currently assigned to the Madison Field Office. I have been so employed since July of 2009. I am a graduate of the Federal Law Enforcement Training Center Criminal Investigator Training Program, the ATF Special Agent Basic Training, and have received extensive training to qualify as an expert

in fire origin and cause investigations. Prior to my employment with the ATF, I worked as a local fire marshal/fire investigator/fire fighter in the state of Virginia from June 1997 to December 2008.

3. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, my review of documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit is intended to show only that there is sufficient probable cause for the requested Criminal Complaint and does not set forth all of my knowledge about this matter. Based on my training and experience and the facts as set forth in this Affidavit, there is probable cause to believe that LITTLE has committed violations of Title 18, United States Code, Section 844(i) (Arson).

PROBABLE CAUSE

January 2023 Vandalism

4. On December 30, 2022, the public email address for U.S. Representative [REDACTED] (the "Congressional email account") received an email from the email address wewantjesusdead999@gmail.com (the "subject email account"). An attached image depicted a Quran in a toilet being urinated on by a male. On December 31, 2022, another email was sent from the subject email account to the Congressional email account with an attached image of a bloody ear. The person depicted in the image had a brown beard with some white hair and brown-framed eyeglasses.

5. On January 5, 2023, at 11:30 a.m., LITTLE was observed shoplifting or attempting to shoplift spray paint from a Target store located at 900 Nicollet Mall, Minneapolis, Minnesota. LITTLE's actions were observed on surveillance video and revealed that LITTLE was wearing a bright yellow jacket, green pants, red shoes, glasses, and a yellow medical face mask. LITTLE also walked with an unusual gait, with his left arm swinging widely. *See Figures 1 and 2.*



Figure 1



Figure 2

6. Around noon on that day, LITTLE entered U.S. Representative [REDACTED]'s district office located at [REDACTED], Minnesota. Representative [REDACTED]'s district office is located approximately two miles from the Target location referenced above. LITTLE's entry and subsequent activity were captured on surveillance video. See Figures 3 and 4. In Representative [REDACTED]'s office building, LITTLE's jacket hood is down, and he is wearing a red beanie; a dark brown beard is also visible. LITTLE

spray-painted the text “500”¹ on the front door of Representative [REDACTED]’s office and photographed the graffiti. See Figures 5 and 6.



Figure 3

¹ The meaning of the “500” text is unclear.



Figure 4



Figure 5

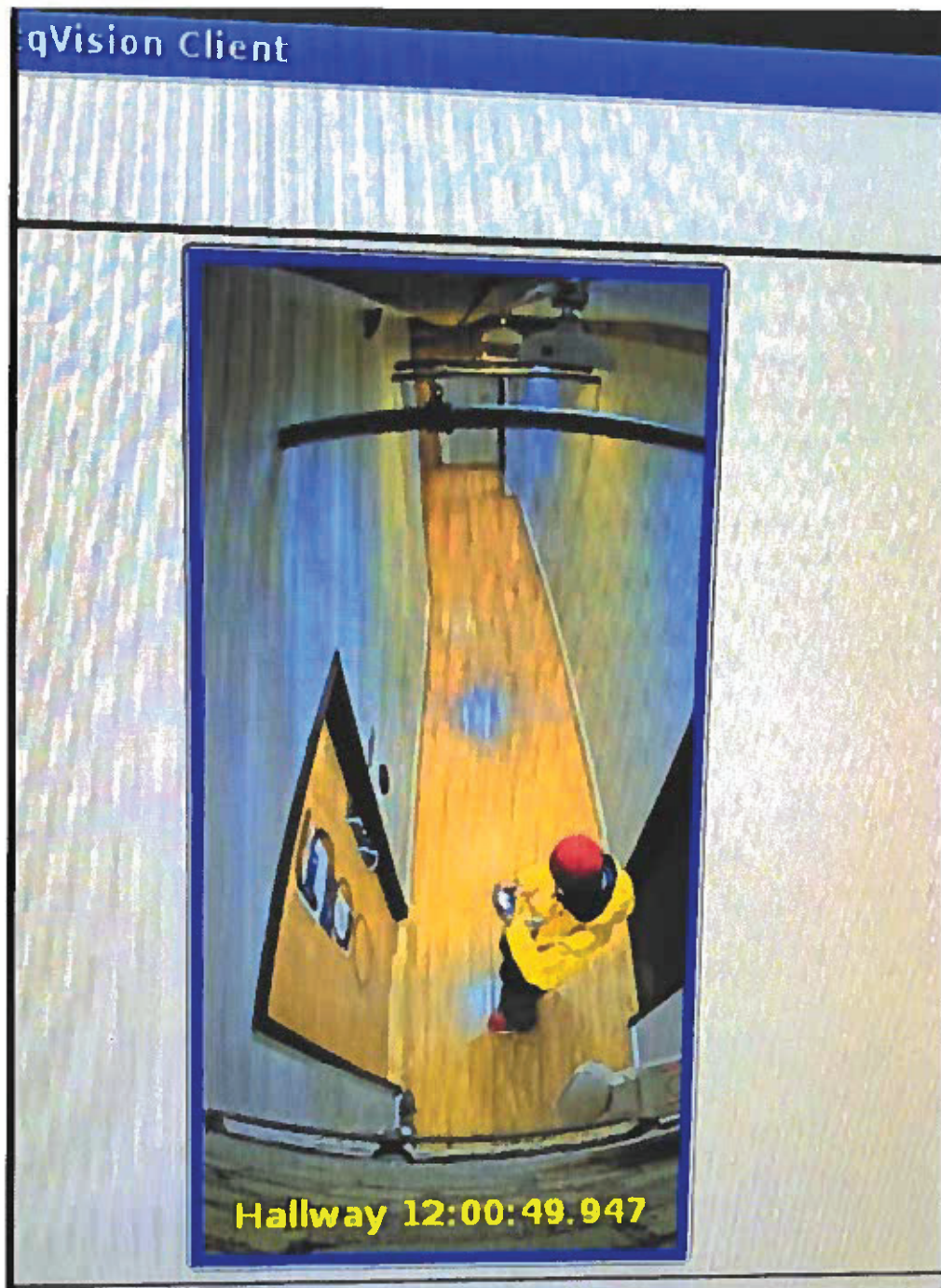


Figure 6

7. At approximately 6:16 p.m. on the same day, an unknown individual, presumed to be LITTLE as described herein, spray-painted the same text ("500") on the

side of a patrol vehicle assigned to a Somali Minneapolis Police Department officer on shift at 1914 Chicago Avenue, Minneapolis, Minnesota. This location is approximately three miles from Representative [REDACTED]'s district office referenced above.

8. At approximately 9:10 p.m. on the same day, an unknown individual, presumed to be LITTLE as described herein, spray-painted the same text ("500") in an entryway at a marketplace located at 912 E 24th Street, Minneapolis, Minnesota. See Figure 7. This marketplace is approximately a half-mile from the location of the patrol vehicle referenced above. The marketplace is colloquially referred to in the community as the "Somali Mall."



Figure 7

9. On January 7, 2023, another email was sent from the subject email account to the Congressional email account, with an image titled “Ready for rush nigger.png”; the image depicted Representative [REDACTED] in the U.S. Capital speaking with a colleague. On March 6, 2023, the Congressional email account received another email from the subject account. The email included four attached images; one of the images was a picture of the “500” graffiti painted on the door of Representative [REDACTED]’s office as described *supra*.

April 2023 Arson

10. At approximately 7:00 p.m. on April 23, 2023, LITTLE started a fire in the bathroom of the Masjid Omar Islamic Center, located at 912 E 24th Street, Minneapolis, Minnesota. The Masjid Omar Islamic Center is located in the same building as the Somali Mall referenced above. LITTLE was observed wearing a black jacket, black beanie, blue jeans, glasses, a blue medical face mask, and carrying a brown paper bag. *See* Figures 8 and 9. LITTLE entered a second-floor bathroom of the Masjid Omar Islamic Center and lit a cardboard box on fire inside a stall. An employee at the location interrupted LITTLE while LITTLE was in the process of igniting the box and chased LITTLE out of the building. Burnt cardboard and a partially melted gas can were left in the bathroom following the fire. *See* Figure 10.



Figure 8



Figure 9

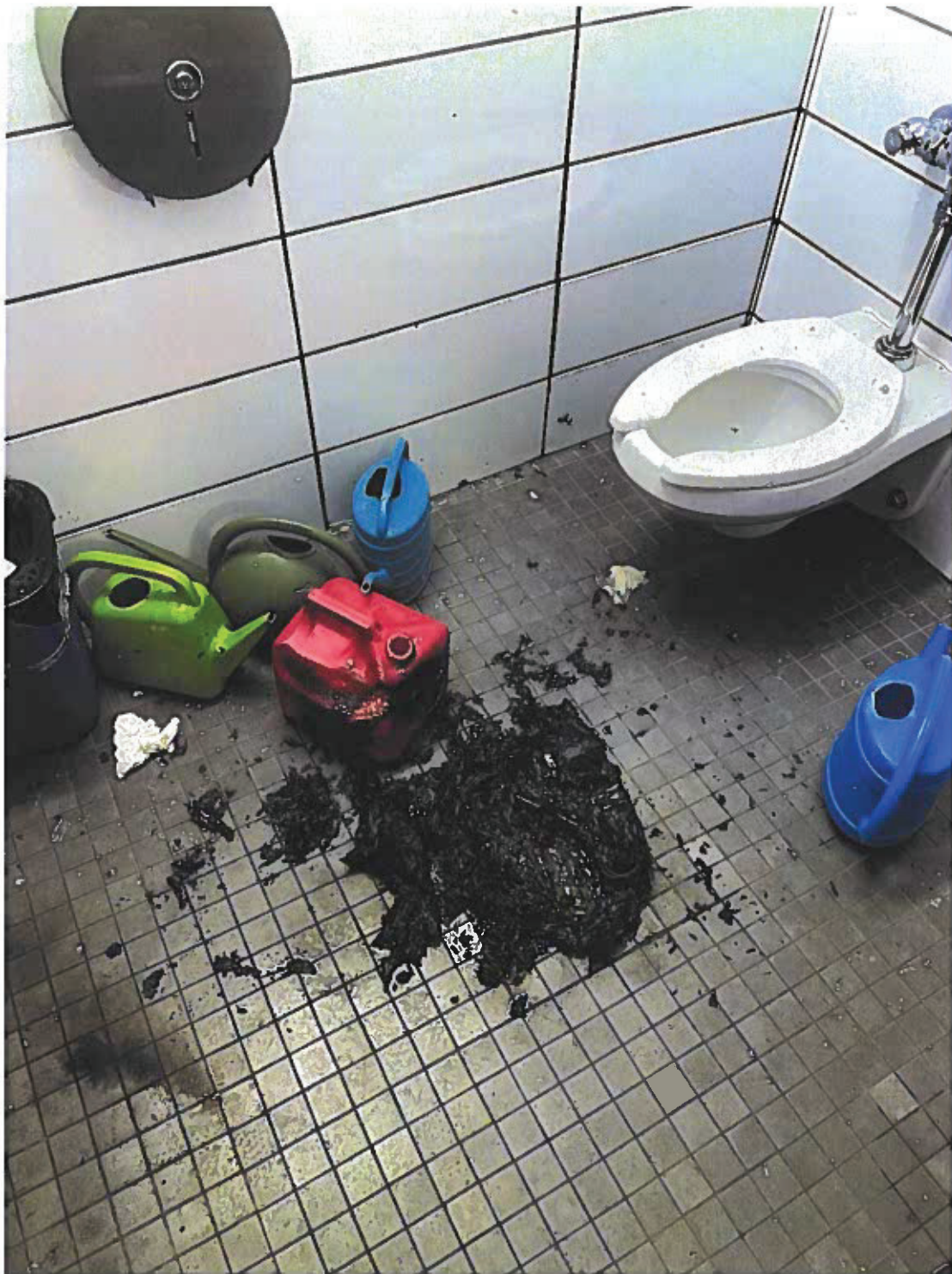


Figure 10

11. The Masjid Al-Rahma Mosque (also known as Mercy Islamic Center) is located at 2647 Bloomington Avenue, Minneapolis, Minnesota. Masjid Al-Rahma is an Islamic Mosque for gathering and prayer. The Mosque rents the lower level of the center to a private daycare business. The Mosque rents a second building to a third party. A gathering hall within the Mosque is frequently rented out for various community gatherings.

12. On April 24, 2023, at approximately 6:30 p.m., surveillance footage shows LITTLE boarding an MTC bus at the intersection of Washington Avenue and 6th Avenue North in Minneapolis wearing a green hooded sweatshirt, black pants, black shoes with bright green laces, black gloves, a flat-brimmed baseball cap, eyeglasses, a blue medical mask, and carrying a brown paper bag. A portion of [REDACTED]'s dark brown mustache is visible at times. *See* Figures 11 and 12. *ew*



Figure 11



Figure 12

LITTLE rode the bus to the vicinity of 2600 Bloomington Avenue, Minneapolis, Minnesota, and was subsequently observed on surveillance video approaching and entering the Masjid Al-Rahma Mosque at about 6:52 p.m. with the same distinctive gait observed in previous surveillance videos. See Figures 13 and 14.



Figure 13



Figure 14

13. At approximately 7:00 p.m., four adult males associated with the Mosque were present at the Mosque. Three of the males were sitting in the front office of the Mosque when a volunteer security guard ran into the office saying there was a fire. One of the adult males ran up the stairs of the Mosque towards the third floor and saw smoke. The security guard called 911 and directed the others to assist in evacuating the children attending daycare on the lower level of the center. Everyone, including approximately forty children, evacuated the building. Law enforcement arriving on scene observed smoke coming from the third floor of the building.

14. The third-floor hallway of the Islamic center was damaged by fire. See Figures 15 and 16. There was significant smoke damage throughout the hallway and to the

stairwells on both ends. *See* Figure 17. A Special Agent Certified Fire Investigator (“SACFI”) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) examined a pile of debris located at the south end of the hallway. The pile of debris included cardboard, seven metal olive oil canisters designed to hold 16 liters of olive oil, and ceiling tiles. A melted red plastic rectangular object consistent in size, shape and color to a commercially available plastic gas can was located under some of the debris at the south end of the hallway. *See* Figure 18. Upon picking up the melted red rectangular plastic object, the SACFI could smell an odor that is consistent with gasoline. The SACFI is familiar with the odor of gasoline based on her training and experience as an ATF Certified Fire Investigator. The SACFI ruled out a light fixture in the area of origin as a potential cause of the fire. Minneapolis Fire Department personnel that responded to the incident described seeing flames along the west side of the floor, down the length of the hallway with the pile of debris on fire at the south end of the hallway. A paper bag bearing the Cub Foods logo was located near south door along the west side of the hallway. The data, information and circumstances in this incident that are available at this time are consistent with an incendiary fire.

15. A representative of the Mosque indicated that the damage to the Mosque likely totaled tens of thousands of dollars.



Figure 15



Figure 16



Figure 17



Figure 18

16. Approximately ten minutes after committing the arson at Masjid Al-Rahma, LITTLE was observed on surveillance video at Marathon Gas, 1700 E. Lake Street, Minneapolis, Minnesota, purchasing a small red gas can and filling it with gasoline. This

location is approximately a half-mile from the Masjid Al-Rahma Mosque. See Figures 19 and 20.



Figure 19



Figure 20

17. LITTLE was not identified during the course of the events described *supra*. Officers with the Plymouth Police Department (“Plymouth PD”) recognized LITTLE from the surveillance footage summarized *supra* as a suspect from a prior arson investigation. Officers from Plymouth PD provided booking photos of LITTLE from a previous arson investigation. See Figures 21 and 22. LITTLE has a known history of arson or suspected

arson, including incidents in May 2022 and December 2021. LITTLE also has several documented incidents of domestic assault and other violent crime as recently as March 2023.



Figure 21

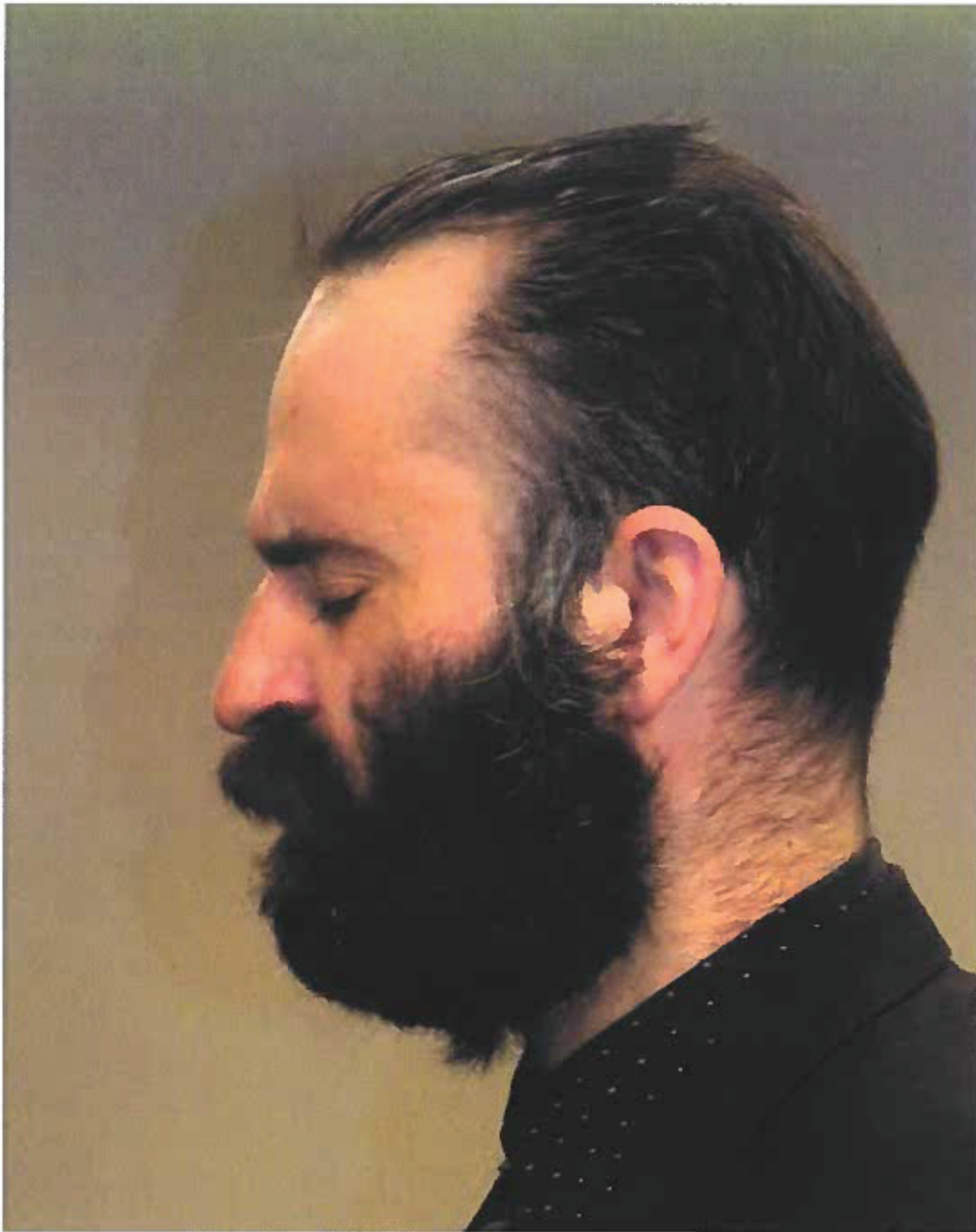


Figure 22

18. On April 27, 2023, law enforcement interviewed LITTLE's mother, T [REDACTED] D [REDACTED]. D [REDACTED] stated that while LITTLE was living in transitional housing, LITTLE extensively harassed a Muslim female. The female managed to get D [REDACTED]'s

phone number and reported some of LITTLE's harassing behavior to D [REDACTED]. In particular, the female sent D [REDACTED] a photo of a copy of the Quran in a toilet, which purportedly had been sent to the female by LITTLE.

19. D [REDACTED] stated that LITTLE has had a fascination with fire from a young age. D [REDACTED] strongly suspects that LITTLE was involved in several unreported arson events based on times in which LITTLE had requested rides to and from various locations.

20. Law enforcement agents showed D [REDACTED] six photos of LITTLE, including photos from surveillance during the January 5, 2023 graffiti incidents, the April 23, 2023 arson incident, and the April 24, 2023 arson incident. D [REDACTED] recognized each photo as a photo of LITTLE. D [REDACTED] additionally verified that the hat, jacket, and shoes worn by LITTLE during the January 5, 2023 graffiti incidents were items that D [REDACTED] had given to LITTLE.

CONCLUSION

21. Based on the information described above, I respectfully submit there is probable cause to believe that Jackie Rahm LITTLE did knowingly commit arson.

Respectfully submitted,



William F. Fulton III
Special Agent,
Bureau of Alcohol, Tobacco, Firearms and
Explosives

SUBSCRIBED and SWORN to before me by reliable
electronic means (Zoom and email) pursuant to
Fed. R. Crim. P. 41(d)(3) on April 27, 2023



The Honorable Elizabeth Cowan Wright
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 23-mj-365 (ECW)

JACKIE RAHM LITTLE
a/k/a Joel Arthur Tueting

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about April 24, 2023, in Hennepin County, in the State and District of Minnesota, defendant(s)

did maliciously damage or destroy, or attempt to damage or destroy, by means of fire or an explosive, a building or other real or personal property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce, in violation of Title 18, United States Code, Sections 844(i).

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

SEE ATTACHED AFFIDAVIT

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

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime and email
pursuant to Fed. R. Crim. P. 41(d)(3).

Date: April 27, 2023City and State: St. Paul, MN
Complainant's signatureWilliam F. Fulton III, Special Agent

Printed name and title


Judge's SignatureElizabeth Cowan Wright
United States Magistrate Judge

Printed Name and Title

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 23-mj-365 (ECW)

JACKIE RAHM LITTLE
a/k/a Joel Arthur Tueting

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) JACKIE RAHM LITTLE,
who is accused of an offense or violation based on the following document filed with the court:

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

did maliciously damage or destroy, or attempt to damage or destroy, by means of fire or an explosive, a building or other real or personal property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce, in violation of Title 18, United States Code, Sections 844(i).

Date: April 27, 2023


Issuing officer's signature

City and State: St. Paul, MN

Elizabeth Cowan Wright
United States Magistrate Judge
Printed Name and Title

Return

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

Date: _____

Arresting officer's signature

Printed name and title