

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America)

v.)

David Wright,)
a/k/a Dawud Sharif Wright,)
a/k/a Dawud Sharif Abdul Khaliq,)

Case No.)

15-6024-MPK)

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of June 2, 2015 in the county of Middlesex in the District of Massachusetts, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 371

Conspire with Ussamah Abdullah Rahim to knowingly destroy, mutilate, conceal, and cover up a tangible object, to wit, Rahim's Smartphone, with the intent to impede, obstruct, and influence an investigation or the proper administration of any matter within the jurisdiction of any department or agency of the United States, or in relation to or contemplation of any such matter or case, in violation of 18 U.S.C. § 1519, all in violation of 18 U.S.C. § 371.

This criminal complaint is based on these facts:

See Affidavit of Special Agent J. Joseph Galietta, Federal Bureau of Investigation

Continued on the attached sheet.

Complainant's signature

Special Agent J. Joseph Galietta, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/03/2015

Judge's signature

City and state: Boston, MA

Magistrate Judge M. Page Kelley

Printed name and title

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency FBI

City Everett

Related Case Information:

County Middlesex

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number 15-6019-MPK, 15-6020-6023
R 20/R 40 from District of _____

Defendant Information:

Defendant Name David Wright Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name Dawud Sharif Wright, Dawud Sharif Abdul Khalig

Address (City & State) Evertt, Massachusetts

Birth date (Yr only): 1989 SSN (last4#): 2796 Sex M Race: B Nationality: US

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:

AUSA B. Stephanie Siegmann and Nadine Pellegrini Bar Number if applicable _____

Interpreter: Yes No List language and/or dialect: _____

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status:

Arrest Date 06/02/2015

Already in Federal Custody as of 06/02/2015 in Braintree Police Department

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: June 3, 2015

Signature of AUSA: _____

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant David Wright

U.S.C. Citations		
<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §371</u>	<u>Conspiracy to Obstruct Justice</u>
Set 2	_____	_____
Set 3	_____	_____
Set 4	_____	_____
Set 5	_____	_____
Set 6	_____	_____
Set 7	_____	_____
Set 8	_____	_____
Set 9	_____	_____
Set 10	_____	_____
Set 11	_____	_____
Set 12	_____	_____
Set 13	_____	_____
Set 14	_____	_____
Set 15	_____	_____

ADDITIONAL INFORMATION: _____

AFFIDAVIT OF SPECIAL AGENT

I, J. Joseph Galietta, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed for approximately 9 years. From 2006 to October 2014, I was assigned to the Maryland/Delaware Joint Terrorism Task Force. Since October 2014, I have been assigned to Boston's Joint Terrorism Task Force, which is responsible for investigating offenses related to international and domestic terrorism. Prior to my employment with the FBI, I was employed as a police officer with Richmond Virginia Police Department for approximately 3 years.

2. In my capacity as a Special Agent, I have received training and gained experience in search and seizure, the use of confidential human sources, electronic and video surveillance, international and domestic terrorism, drug offenses, violent crimes, computer crimes, money laundering, fraud and various other crimes. As a result of my training and experience, I am familiar with the tactics, methods and techniques of terrorist networks and their members, including the use of computers, cell phones, social media, email, and the internet in connection with criminal activity. I have executed numerous affidavits in support of federal search warrants and criminal complaints and have participated in the execution of numerous search warrants.

3. Along with other agents, I have been investigating Usaamah Abdullah Rahim ("RAHIM"), who resided at 375 Blue Ledge Drive, Roslindale, Massachusetts, until his death at approximately 7:00 a.m. yesterday morning, and David Wright a/k/a Dawud Sharif Wright a/k/a Dawud Sharif Abdul Khaliq ("WRIGHT"), who resided at 208 Linden Street, Apt. 4, Everett, Massachusetts for several federal criminal offenses, including terrorism offenses. I have personally participated in this investigation. The information in this affidavit is based upon my

training and experience, my personal knowledge of this investigation, and information provided to me by other agents and law enforcement officials who have assisted in this investigation and have experience investigating international terrorism matters. All conversations and statements described in this affidavit are related in substance and in part only unless otherwise indicated.

4. As indicated below, there is probable cause to believe that, on or about June 2, 2015, WRIGHT did conspire with RAHIM to knowingly destroy, mutilate, conceal, and cover up a tangible object, to wit, RAHIM's Smartphone, with intent to impede, obstruct, or influence an investigation or the proper administration of any matter within the jurisdiction of any department or agency of the United States, or in relation to or contemplation of any such matter or case, in violation of 18 U.S.C. § 1519, all in violation of 18 U.S.C. § 371.

5. This affidavit does not detail all of the facts known to me regarding this matter but relates only those necessary to establish probable cause for issuance of the requested complaint and arrest warrant.

RELEVANT LEGAL AUTHORITY

6. Title 18, United States Code, Section 1519 makes it illegal for anyone to knowingly alter, destroy, mutilate, conceal, or cover up a tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States or in relation to or contemplation of any such matter or case. Title 18, United States Code, Section 371 prohibits conspiracies to commit other federal offenses.

SUMMARY OF INVESTIGATION

7. United States law enforcement agents, including members of the Boston FBI's Joint Terrorism Task Force, have been investigating individuals located in the United States who are providing, or are attempting to provide, material support to terrorism by planning or engaging in violent attacks domestically.

8. This investigation has revealed that, since on or before May 26, 2015, RAHIM, a 26-year-old private security officer, has been planning to engage in a violent attack in the United States, which was confirmed during an interview of WRIGHT on June 2, 2015. RAHIM took several steps in furtherance of this plan, including the purchase of three fighting knives and a knife sharpener from Amazon.com, and discussed his plan with WRIGHT.

WHAT THE INVESTIGATION HAS DETERMINED

9. Based upon records obtained from Amazon.com, on or about May 25, 2015, RAHIM purchased an Ontario Spec Plus Marine Raider Bowie fighting knife ("Marine fighting knife") and a device used to sharpen knives. The Marine fighting knife Rahim purchased is 15 inches long when opened, contains a 9.75" blade, and weighs 22.4 ounces.

10. On or about May 26, 2015, RAHIM called WRIGHT. During the call, which was recorded:

a. RAHIM advised WRIGHT that "I just got myself a nice little tool. You know it's good for carving wood and like, you know, carving sculptures . . . and you know . . ."

WRIGHT and RAHIM then both began laughing. I believe that when RAHIM said "nice little tool" that was "good for carving," he was referring to the Marine Raider Bowie fighting knife that he had purchased the previous day.

b. In guarded language, RAHIM told WRIGHT about a plan, in which he was involved, to kill a person outside of Massachusetts. RAHIM and WRIGHT discussed the motivation for that planned attack.

c. Later in the conversation, WRIGHT told RAHIM something was “like thinking with your head on your chest.” Both men then burst out laughing. Based upon my training, experience, and involvement in this investigation, I believe this is a reference to the practice of some foreign terrorist organizations to behead targets and place their heads on their chests in propaganda videos.

11. On or about May 27, 2015, before the Marine Fighting Knife was delivered, an FBI Special Agent Bomb Technician intercepted the package and x-rayed it and determined it contained a large knife and knife sharpener tool. Shortly thereafter, using video surveillance, FBI agents watched as the package containing the knife and the sharpener was delivered to RAHIM’s address.

12. Based upon records obtained from Amazon.com, on or about May 27, 2015, RAHIM purchased a second Marine fighting knife and an Ontario Knife SP6 Spec Plus Fighting Knife 8325 (“SP6 Spec Plus Fighting Knife”). The SP6 Spec Plus Fighting Knife Rahim purchased is 13 inches long and has an eight inch blade. On Saturday, May 30, 2015, based upon records from Amazon, these two knives were delivered to RAHIM’s residence.

13. On May 28, 2015, RAHIM sent a text message confirming with WRIGHT that they would be meeting on Sunday, May 31, 2015 with a third person.

14. On May 30, 2015, WRIGHT sent a text message to RAHIM indicating that he had spoken with the third person and they had a lot to talk about.

15. On Sunday, May 31, 2015, RAHIM, WRIGHT, and the third person met on a beach in Rhode Island, in inclement weather, to discuss their plans. As described below, WRIGHT later advised FBI agents that these plans included the beheading of the planned victim in another state, as discussed above.

16. At approximately 5:00 a.m. on June 2, 2015, RAHIM called WRIGHT and advised him that he had changed his plans and no longer planned to commit an attack in another state. Instead, he said that he was going to “go after” the “boys in blue,” which I believe to be a reference to police officers. During this telephonic conversation, which was recorded, the following statements, among other things, were made:

RAHIM: And, ah, but I can't wait that long, I can't wait that long man.

WRIGHT: Are you, are you trying to figure out where, are you trying to go to [the other state]?

RAHIM: No.

WRIGHT: You are not, I'm trying to understand, wait, you are not trying to go to [the other state]?

RAHIM: No.

WRIGHT: Oh, oh wait a minute, oh ah, you are going to be, ah, you're attempting to go on vacation I see.

RAHIM: Yeah, I'm going to be on vacation right here in Massachusetts...I'm just going to ah go after them, those boys in blue. Cause, ah, it's the easiest target and, ah, the most common is the easiest for me...

Based upon my training, experience, and involvement in this case, I believe that “going on vacation,” a phrase used repeatedly in conversations between WRIGHT and RAHIM, refers to committing violent jihad.

17. Additionally, during this conversation, RAHIM revealed to WRIGHT that he planned to randomly kill police officers in Massachusetts either yesterday (June 2) or today (June 3). In response, WRIGHT advised him to prepare his will and leave “his possessions” to a named individual.

18. After discussing with RAHIM the plan to attack police officers, WRIGHT directed RAHIM to delete information from, and destroy, his Smartphone and wipe his laptop computer. Specifically, with regards to RAHIM’s phone, WRIGHT instructed RAHIM:

WRIGHT: [m]ake sure also, very important, make sure that, ah, at the moment that you decide to that you ah, delete, you delete ah, from your phone or you break it apart. Throw it down to the ground.

RAHIM: Yup.

WRIGHT: Get rid of it, before anybody gets it; make sure it’s completely destroyed.

RAHIM: I will.

WRIGHT: Because, at the scene, at the scene, CSI will be looking for that particular thing and so dump it, get rid of that. At the time you are going to do it, before you reach your destination you get rid of it.

Based upon my training, experience, and involvement in this investigation, I believe that “CSI” refers to law enforcement, thus indicating WRIGHT’s belief that law enforcement would be conducting an investigation of RAHIM’s actions. I believe that WRIGHT’s reference to the fact that law enforcement would be looking for “that particular thing” refers to some especially sensitive information, document, or thing to be found on RAHIM’s Smartphone. In addition,

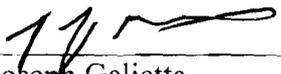
WRIGHT encouraged RAHIM to “completely wipe out everything” on his laptop computer “to its factory setting.”

19. Shortly after this conversation, on June 2, 2015, RAHIM was on a public street in the Boston area, when he was approached by Boston Police Officers and FBI special agents. RAHIM took out one of the knives he had purchased from Amazon.com when he saw the officers and agents. One of the officers told RAHIM to drop his weapon and RAHIM responded, “you drop yours.” RAHIM then moved towards the officers while brandishing his weapon, and he was shot by law enforcement.

20. On June 2, 2015, agents of the FBI interviewed WRIGHT shortly after RAHIM was shot. The agents advised WRIGHT of his Miranda rights. WRIGHT waived his rights and agreed to speak with the agents. During this interview, the agents asked WRIGHT about what had transpired at the Sunday meeting on the beach in Rhode Island. According to WRIGHT, at that meeting, RAHIM told WRIGHT and the third person that he was going to behead the intended victim in another state. WRIGHT indicated that he agreed with RAHIM’s plan and supported it.

CONCLUSION

21. Based on the information described herein, I have probable cause to believe, and do in fact believe that on or about June 2, 2015, WRIGHT did conspire with RAHIM to knowingly destroy, mutilate, conceal, and cover up a tangible object, to wit, RAHIM's Smartphone, with intent to impede, obstruct, or influence an investigation or the proper administration of any matter within the jurisdiction of any department or agency of the United States, or in relation to or contemplation of any such matter or case, in violation of 18 U.S.C. § 1519, all in violation of 18 U.S.C. § 371.



J. Joseph Galletta
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me this 3rd day of June 2015.



M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE

