

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MOHAMMAD SHARIFULLAH,

A/k/a “Jafar,”

Defendant.

Case No. 1:25-mj-144

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

I, Seth Parker, being duly sworn, hereby depose and state:

BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), currently assigned to the Washington Field Office, and have been so employed since February 2013. While employed with the FBI, I have primarily conducted national security investigations and have also served as a supervisor where I managed a counterterrorism program at FBI Headquarters. I have previously effected criminal complaints, arrest and search warrants to include social media and electronic media, and have been involved in the investigation of numerous types of offenses against the United States, including crimes of terrorism. Prior to employment with the FBI, I was an Infantry Officer in the U.S. Army and led a rifle platoon in Afghanistan. My knowledge of the facts and circumstances contained within this affidavit is based upon my personal investigation as well as reports made to me by other law enforcement agents and governmental officials.

2. This affidavit is submitted in support of an application for a criminal complaint charging Mohammad Sharifullah, also known as “Jafar” (hereinafter, “Sharifullah”) with providing and conspiring to provide material support to a designated foreign terrorist organization resulting in death, in violation of Title 18, United States Code, Section 2339B.

3. The facts set forth in this affidavit are based on my personal knowledge and review of records, documents, and other physical evidence obtained during this investigation, as well as information conveyed to me by other law enforcement officials. This affidavit does not include each and every fact observed by me or known to the government. I have set forth only those facts necessary to support a finding of probable cause.

4. Upon arrest, the defendant will be first brought in custody into the Eastern District of Virginia. 18 U.S.C. § 3238.

PROBABLE CAUSE

Background on the Islamic State of Iraq and ash-Sham (“ISIS”) and ISIS Khorasan (“ISIS-K”)

5. The Islamic State, or ISIS, is a militant group that follows a Salafi jihadist ideology based on the Sunni branch of Islam. The group presents an inherent global threat based on the extreme ideology that suggests all true Muslims have an obligation to undertake armed conflict to establish an Islamic caliphate, and are sanctioned to conduct violence against leaders of Islamic or other states they declare as kafirs or infidels (non-believers). The movement has its origins in Iraq, growing out of its direct precursor, Al-Qaeda in Iraq (AQI).

6. On or about October 15, 2004, the United States 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 (“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 amended AQI’s FTO designation 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 (“ISIS”), 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 and SDGT listings: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

7. On January 14, 2016, the United States Secretary of State designated ISIL Khorasan as an FTO under Section 219 of the Immigration and Nationality Act and on January 21, 2016, as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. The Secretary of State has also listed the following aliases for ISIL Khorasan: The Islamic State of Iraq and ash-Sham-Khorasan Province, Islamic State’s Khorasan Province, ISIS Wilayat Khorasan, ISIL’s South Asian Branch, South Asian chapter of ISIL, the Islamic State of Iraq and Syria-Khorasan, Islamic State of Iraq and Levant in Khorasan Province, Islamic State Khurasan, ISISK, ISIS-K (which is how the FTO will be referenced herein), and IS-Khorasan. To date, ISIS-K remains a designated FTO.

8. On March 2, 2025, the defendant, Mohammad Sharifullah, was interviewed by FBI Special Agents on or about March 2, 2025, after they reviewed his *Miranda* rights with him and

he agreed to speak. During the interview, Sharifullah stated that he was recruited into ISIS-K in or around 2016. Sharifullah has at all times since then been a member of ISIS-K. He admitted to supporting and conducting activities on behalf of ISIS-K in support of multiple lethal attacks, three of which are described below.

The Attack on Embassy Guards in Kabul, Afghanistan on June 20, 2016

9. On June 20, 2016, a suicide bomber acting on behalf of ISIS-K and intending to target United States Embassy personnel in Kabul, Afghanistan detonated a bomb that killed over ten embassy guards and wounded other soldiers tasked with guarding the Canadian embassy, in addition to killing multiple civilians in Kabul, Afghanistan.

10. ISIS issued a press release claiming responsibility for the attack, which they erroneously claimed killed guards tasked with protecting the United States Embassy. As stated in the press release, “Sixteen Nepalese soldiers charged with guarding the American Embassy in the city of Kabul were killed in a martyrdom-seeking operation using an explosives belt carried out by the brother ‘Irfan Allah Ahmad’ – may God accept him – on a bus that was transporting them in the Banae area, praise be to God.”

11. In an interview with FBI Special Agents after waiving his *Miranda* rights on or about March 2, 2025, Sharifullah stated the following: Sharifullah, as part of his service to ISIS-K conducted surveillance so that he could prepare the suicide bomber and transport him to the target area. ISIS-K provided Sharifullah and others housing and Sharifullah, in fact, transported the bomber to the location of the attack. Sharifullah recalled that the name of the bomber he transported to the site of the attack was Irfan.

The Abbey Gate Attack on Hamid Karzai International Airport (“HKIA”) on August 26, 2021

12. On August 26, 2021, American and other Coalition military forces were conducting an evacuation operation at HKIA as part of a larger operation to conclude U.S. combat operations in Afghanistan. Abbey Gate was the main entry control point for the operation. Thousands of civilians were at or near Abbey Gate on August 26 for evacuation processing.

13. At approximately 5:36 p.m. local time, a lone suicide bomber detonated an explosive device at Abbey Gate. This attack killed thirteen United States military service members. Approximately 160 civilians also died in the explosion.

14. After conducting an investigation of the attack, the Department of Defense (“DOD”) concluded the suicide bomber was an ISIS-K member named Abdul Rahman al-Logari. DOD also concluded al-Logari used a body-worn improvised explosive device (“IED”) to conduct the attack.

15. In an interview with FBI Special Agents after waiving his *Miranda* rights on or about March 2, 2025, Sharifullah stated the following: Sharifullah was in prison in Afghanistan from approximately 2019 until approximately two weeks before the HKIA attack. Upon Sharifullah’s release, an ISIS-K member contacted Sharifullah to arrange for his assistance in an upcoming attack.

16. ISIS-K members provided Sharifullah with a motorcycle, funds for a cell phone and a SIM card, and instructions to open an account on a particular social media platform to communicate with them during the attack operation. After making these preparations for the attack, Sharifullah was tasked with scouting a route near HKIA for an attacker. Sharifullah conducted surveillance on a route, specifically checking for law enforcement and American or Taliban

checkpoints. Sharifullah communicated to other ISIS-K members that he believed the route was clear and that he did not think the attacker would be detected while proceeding through that route. ISIS-K members then instructed Sharifullah to leave the area of HKIA. Later that same day, Sharifullah learned of the attack at HKIA described above and recognized the alleged bomber as an ISIS-K operative he had known while incarcerated.

The Attack at Moscow Nightclub on March 22, 2024

17. On March 22, 2024, a group of gunmen affiliated with ISIS-K attacked Crocus City Hall, a popular concert venue complex near Moscow, Russia. The attackers shot numerous victims with firearms including AK-style rifles and set fire to the building. The attack killed approximately 130 people and injured numerous others.

18. After the attack, an ISIS spokesperson released a statement praising the attack and calling for additional attacks by “lone wolves” targeting Christians and Jewish people, especially in the United States, Europe, and Israel during the holy month of Ramadan.

19. In an interview with FBI Special Agents after waiving his *Miranda* rights on or about March 2, 2025, Sharifullah stated the following: Sharifullah received an order from a known ISIS-K senior leader to provide instructions on how to properly use AK-style rifles and other weapons to would-be attackers in Moscow. Sharifullah shared video instructions with several individuals. Following the attack, Russian authorities arrested four gunmen in connection with the attack. Sharifullah recognized two of those individuals as the same people to whom he provided the firearms training video.

CONCLUSION

20. Based on the foregoing and my training and experience, I submit there is probable cause to believe that beginning at least as early as 2016 and continuing through present, Mohammad Sharifullah, also known as "Jafar," and others, knowingly and unlawfully conspired together and with each other to provide material support and resources to a designated foreign terrorist organization resulting in death, in violation of 18 U.S.C. § 2339B.

21. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/
Seth Parker
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to me this 2nd day of March, 2025.

Lindsey R Vaala  Digitally signed by Lindsey R Vaala
Date: 2025.03.02 20:49:58 -05'00'

Honorable Lindsey R. Vaala
United States Magistrate Judge