

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Randi Beck, being first duly sworn, state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (hereinafter referred to as "FBI") and have been so employed since August 2010. As such, I am an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Titles 18 and 21 of the United States Code. I have been the lead agent for extraterritorial investigations targeting foreign terrorist organizations. I have testified before Grand Juries, conducted physical and electronic surveillance, administered confidential sources, and received training as investigative techniques evolve.

2. This affidavit is being submitted in support of a criminal complaint alleging that SHAHRAM POURSAFI, a/k/a "Mehdi Rezayi" (hereinafter referred to as "POURSAFI"), violated the following federal criminal laws: (1) 18 U.S.C. § 1958(a) (Use of interstate commerce facilities in the commission of murder for hire), and (2) 18 U.S.C. § 2339A (Providing and attempting to provide material support to a transnational murder plot).

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, law enforcement records, court-authorized searches, witness interviews, and my training and experience, as well as the training and experience of other law enforcement agents. When I provide in this affidavit direct quotations of statements, they are often preliminary translations of statements that were made in the Farsi language.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known

to me concerning this investigation. I have only set forth the facts that I believe are necessary to establish probable cause that the defendant violated the federal criminal laws set forth herein.

#### **SUMMARY OF OFFENSE CONDUCT**

5. On or about January 3, 2020, Qasem Soleimani, the former commander of Iran's Islamic Revolutionary Guard Corps – Qods Force (hereinafter referred to as "IRGC-QF"), was killed by a U.S. air strike in Iraq. Certain members of the leadership of Iran denounced the killing and have publicly vowed revenge. On or about January 3, 2022, Iranian President Ebrahim Raisi gave a public address in which he stated that former-President Trump and other former high-ranking officials in the Trump Administration needed to face trial for the air strike targeting Qassem Soleimani. Raisi vowed that the "fist of revenge would extend from the sleeve of the Islamic ummah" if those responsible did not face trial. Then, on or about January 7, 2022, the current IRGC-QF Commander, Esmail Ghani (hereinafter referred to as "Ghani") at a ceremony marking the second anniversary of the death of Soleimani, emphasized that Iran would take revenge for Soleimani's death in its own way. He specified, "We will prepare ground for the hard revenge against the U.S. from within their homes, as we do not need to be present as supervisors everywhere, wherever is necessary we take revenge against Americans by the help of people on their side and within their own homes without our presence."

6. POURSAFI is a 45 year-old citizen of Iran. According to records of U.S. Customs and Border Protection, POURSAFI has never visited the United States.

7. Beginning at least in or around October 2021 and continuing to at least in or around April 2022, POURSAFI used and caused others to use the facilities of interstate commerce, and caused others to travel in interstate commerce, to arrange for and with the intent to murder former National Security Advisor John Bolton (hereinafter referred to as the "FORMER

GOVERNMENT OFFICIAL” or “FORMER GO”). The murder was to be committed in the United States in exchange for payment in excess of \$250,000. POURSAFI acted from Iran, with others, to arrange for the murder of the FORMER GO in the District of Columbia or Maryland.

8. As described in more detail below, certain acts or omissions in furtherance of the specified crimes occurred within Washington, D.C. In addition, the specified crimes began or were committed out of the jurisdiction of any particular state or district, and no offender is known to have, or have had, residence within any United States district.

### **PROBABLE CAUSE**

#### **POURSAFI attempts to recruit INDIVIDUAL A**

9. In or around 2021, POURSAFI met INDIVIDUAL A on a social media site. POURSAFI identified himself to INDIVIDUAL A as Shahram Poursafi, and the account POURSAFI used had the display name, “Shahram Poursafi.” POURSAFI told INDIVIDUAL A that POURSAFI was located in Iran.

10. On or around October 22, 2021, POURSAFI asked INDIVIDUAL A to take photographs of the FORMER GO. POURSAFI provided the first and last name of the FORMER GO, and a photograph of the FORMER GO, to INDIVIDUAL A. POURSAFI told INDIVIDUAL A he needed the pictures for a book that POURSAFI was writing. POURSAFI said that if INDIVIDUAL A could find someone to take the requested photographs, POURSAFI would pay that person. In response, INDIVIDUAL A then told POURSAFI that he/she could introduce POURSAFI to an associate who could take the photographs and videos as requested (hereinafter referred to as the “CONFIDENTIAL HUMAN SOURCE” or “CHS”). POURSAFI asked INDIVIDUAL A to suggest a price on behalf of the CHS. INDIVIDUAL A told POURSAFI that the CHS wanted \$5,000-\$10,000 USD in exchange for pictures or videos.