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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JALEEL TARIQ ABDUL-JABBAAR,

Defendant.

CASE NO. **MJ 14-467**

COMPLAINT for VIOLATIONS

Title 18, U.S.C., Section 875(c)

BEFORE, Brian A. Tsuchida, United States Magistrate Judge, United States  
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Interstate Threats)**

On or about November 11, 2014, at Seattle, within the Western District of  
Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and  
willfully transmitted in interstate and foreign commerce, from the State of Washington to  
another state, a communication, that is, a public Facebook posting, that contained a threat  
to injure D.W. and D.W.'s family members, specifically, a posting containing the  
message: "Are there any REAL BLACK MEN that would love to go down to Ferguson  
Missouri to give back those bullets that Police Officer [D.W.] fired into the body of Mike

1 | Brown. If we're unable to locate Officer [D.W.] then We'll return them to his wife and if  
2 | not her then his children."

3 | All in violation of Title 18, United States Code, Section 875(c).

4 | **COUNT 2**

5 | **(Interstate Threats)**

6 | On or about November 24, 2014, at Seattle, within the Western District of  
7 | Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and  
8 | willfully transmitted in interstate and foreign commerce, from the State of Washington to  
9 | another state, a communication, that is, a public Facebook posting, that contained a threat  
10 | to injure D.W., specifically, a posting containing D.W.'s name and photograph and the  
11 | message, "Ready to go and kill some cops."

12 | All in violation of Title 18, United States Code, Section 875(c).

13 | **COUNT 3**

14 | **(Interstate Threats)**

15 | On or about November 24, 2014, at Seattle, within the Western District of  
16 | Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and  
17 | willfully transmitted in interstate and foreign commerce, from the State of Washington to  
18 | another state, a communication, that is, a public Facebook posting, that contained a threat  
19 | to injure D.W., specifically, a posting containing a news report about D.W. and the  
20 | message, "We need to kill this white motha fucka and anything that has a badge on."

21 | All in violation of Title 18, United States Code, Section 875(c).

22 | And the complainant states that this Complaint is based on the following  
23 | information:

24 | I, Brett D. Grover, being first duly sworn on oath, depose and say:

25 | **INTRODUCTION**

26 | 1. I am a Special Agent (SA) for the Federal Bureau of Investigation (FBI),  
27 | currently assigned to the Seattle Field Division. I have been employed in this capacity  
28 | since June 2009. I am currently assigned to an International Terrorism squad as part of

1 the Joint Terrorism Task Force. I have received basic federal law enforcement training,  
2 including the training at the FBI academy, as well as other specialized federal law  
3 enforcement training. I have participated in the investigation of numerous national  
4 security matters and criminal matters. I have used many investigative techniques in  
5 furtherance of such investigations. I have interviewed and operated informants,  
6 conducted numerous searches and interviews, and have conducted physical and electronic  
7 surveillance.

8 2. The facts in this affidavit come from my personal observations, my training  
9 and experience, and information obtained from other agents, detectives, analysts, and  
10 witnesses. This affidavit is intended to show that there is sufficient probable cause that  
11 the defendant committed the offenses charged above, and does not set forth all of my  
12 knowledge about this matter.

### 13 SUMMARY OF INVESTIGATION

#### 14 **A. Abdul-Jabbaar's Facebook Page.**

15 3. The subject of this investigation is Jaleel Tariq Abdul-Jabbaar. There is  
16 probable cause to believe that Abdul-Jabbaar is the user of the Facebook page located at  
17 [www.Facebook.com/Jaleel1968](http://www.Facebook.com/Jaleel1968). At the top of this Facebook page, in the header area,  
18 there is a photograph (known as a "profile picture") of Abdul-Jabbaar next to his full  
19 name, "Jaleel Tariq Abdul-Jabbaar." I am familiar with Abdul-Jabbaar through this  
20 investigation and can confirm that the photograph on the Facebook page is, in fact,  
21 Abdul-Jabbaar. Public records also reflect that Abdul-Jabbaar was born in the year 1968.  
22 The user of this Facebook page also has posted multiple photos of Abdul-Jabbaar in  
23 various contexts. Moreover, the Facebook page contains various other identifying  
24 information related to the user of the page, including that he was from Philadelphia,  
25 Pennsylvania and had previously lived in the State of Michigan. Court records confirm  
26 that Abdul-Jabbaar has previously lived in Philadelphia and Michigan. Moreover, during  
27 September 2014, the user of the Facebook page posted messages stating that he just  
28 moved into a specific apartment complex in Kirkland, Washington. Records maintained

1 by the United States Department of Housing and Urban Development confirm that  
2 Abdul-Jabbaar receives subsidized housing benefits at this same apartment complex.  
3 Based on this information, I believe that Abdul-Jabbaar is the user of the Facebook page  
4 located at [www.Facebook.com/Jaleel1968](http://www.Facebook.com/Jaleel1968).

5 **B. Abdul-Jabbaar's Threatening Communications.**

6 4. During this investigation, I and other FBI personnel have reviewed the  
7 publically available portions of Abdul-Jabbaar's Facebook page on numerous occasions.  
8 As described more fully below, Abdul-Jabbaar has posted several messages containing  
9 threats against D.W., a police officer in Ferguson, Missouri. The threats relate to the  
10 widely-publicized events of August 9, 2014, during which Officer D.W. fatally shot  
11 Michael Brown. On November 24, 2014, the St. Louis County Prosecuting Attorney  
12 announced that the grand jury investigating the shooting decided not to return an  
13 indictment against D.W.

14 5. Five days after the shooting, on August 14, 2014, Abdul-Jabbaar posted the  
15 following message on his Facebook page: "Just finished watching the news and they still  
16 haven't named the white motha fucka that shot that boy. Then we can find where that  
17 cop's child goes to school at and hope that the same can be returned back to that white  
18 cracka."

19 6. On August 30, 2014, Abdul-Jabbaar re-posted a news report with the  
20 headline, "Recently Released Surveillance Video Has Sparked Outrage Completely  
21 Contradicting The Official Police Story Of The Incident." Immediately above the  
22 headline, Abdul-Jabbaar posted the message: "We really need to start killing the police ...  
23 OOoooppsss I mean our oppressors."

24 7. On September 13, 2014, Abdul-Jabbaar re-posted a news report with the  
25 headline, "'He had his f\*\*king hands in the air!' New footage shows Ferguson witnesses  
26 reacting to teen's death." Immediately above the headline, Abdul-Jabbaar posted the  
27 message: "I would love to smoke a white motha fuck'n cop."  
28

1 8. On September 15, 2014, Abdul-Jabbaar posted a graphic containing D.W.'s  
2 name, photographs of D.W. in uniform, and the headline, "Wanted For Murder Of Mike  
3 Brown." Immediately above the graphic, Abdul-Jabbaar posted the message: "This dude  
4 needs his house sprayed."

5 9. On October 27, 2014, Abdul-Jabbaar re-posted a news report with the  
6 headline, "ANONYMOUS Posts Information on Officer [D.W.'s] Location and His  
7 Friend[.]" Immediately above the news report, Abdul-Jabbaar posted the message: "We  
8 the oppressed people need to kill this white cop."

9 10. On November 11, 2014, Abdul-Jabbaar posted the message: "Are there any  
10 REAL BLACK MEN that would love to go down to Ferguson Missouri to give back  
11 those bullets that Police Officer [D.W.] fired into the body of Mike Brown. If we're  
12 unable to locate Officer [D.W.] then We'll return them to his wife and if not her then his  
13 children."

14 11. On November 16, 2014, Abdul-Jabbaar posted a lengthy message,  
15 including the following statements: "How many are preparing, or are prepared for  
16 Ferguson. We all know this white motha fucka is going to walk when the grand jury  
17 deliver there answer. Who the fuck heard of the police policing themselves. This is  
18 some real bullshit. Whatever pocket change I got I'm ready to roll to lay down my life so  
19 who is ready to roll with me. . . . There will be many real black men that will be putt'n  
20 in real work with that steel [firearm] will fall on the day when the grand jury let this  
21 motha fucka walk. I SAY 'NO MORE.'"

22 12. On November 22, 2014, Abdul-Jabbaar posted the message: "I got my  
23 money to go to Ferguson . . . Who else is going to put in some work?"

24 13. On November 24, 2014, Abdul-Jabbaar re-posted a news report containing  
25 D.W.'s name and photograph, and the headline, "Ferguson Grand Jury Verdict Has Just  
26 Been Reached." Immediately above the news report, Abdul-Jabbaar posted the message:  
27 "Ready to go and kill some cops."  
28

1 14. Later on November 24, 2014, Abdul-Jabbaar re-posted a news report with  
2 the headline, "Attorney: Ferguson grand jury has reached decision." Immediately above  
3 the news report, Abdul-Jabbaar posted the message: "We need to kill this white motha  
4 fucka and anything that has a badge on."

5 15. On November 25, 2014, Abdul-Jabbaar posted a cartoon graphic depicting  
6 a black male shooting a police officer in uniform. Immediately above the graphic,  
7 Abdul-Jabbaar posted the message: "We black folks should've been doing this to the  
8 police last night. We MUST arm ourselves against the white oppressors that wear guns  
9 and badges. It's time to start carrying guns as well to kill the white oppressors."

10 16. On November 26, 2014, Abdul-Jabbaar re-posted a news report with the  
11 headline, "Two FBI agents shot at house near Ferguson unrest." Immediately above the  
12 headline, Abdul-Jabbaar posted the message: "This is how you put your work in, that's  
13 what the fuck I'm talk'n about."

14 17. On November 28, 2014, Abdul-Jabbaar re-posted a photograph of a bloody,  
15 beheaded white individual. Immediately above the photograph, Abdul-Jabbaar posted the  
16 message: "This could be white police Oppressors here in this country getting there [sic]  
17 heads removed."

18 18. According to Facebook's official website and the publically available  
19 description of where Facebook's on-line data centers (servers) are located, the data  
20 centers are located in Prineville, Oregon; Forest City, North Carolina; Lulea, Sweden;  
21 and Altoona, Iowa. Thus, there is probable cause to believe that all of the Facebook  
22 postings described above involved an interstate wire communication that traveled outside  
23 the State of Washington.

24 **C. Abdul-Jabbaar's Attempt to Acquire a Firearm.**

25 19. I have reviewed additional Facebook records that reveal that Abdul-Jabbaar  
26 has been attempting to acquire a firearm. Abdul-Jabbaar has multiple prior felony  
27 convictions, making it unlawful for him to possess a firearm. Abdul-Jabbaar's prior  
28 felony convictions include: *Manufacture, Delivery or Possession with Intent to*

1 *Manufacture or Deliver a Controlled Substance*, in the Philadelphia Common Pleas  
 2 Court, State of Pennsylvania, on or about September 4, 1992; and *Unlawful Possession of*  
 3 *a Firearm*, in the United States District Court for the Western District of Washington, on  
 4 or about October 29, 2009 (case number CR08-157TSZ). Abdul-Jabbaar's federal  
 5 firearms conviction involved his participation in a shoot-out arising out of a domestic  
 6 violence incident involving his friend's sister.

7 20. On October 29, 2014, Abdul-Jabbaar was communicating with another  
 8 person (K.A.) over his Facebook page. At 11:58 a.m., Abdul-Jabbaar asked, "Hey bro,  
 9 how do you protect you home and family?" K.A. replied that he has been "taking  
 10 advantage of my 2<sup>nd</sup> amendment rights." Abdul-Jabbaar responded, "I'm in need to  
 11 invoke my 2<sup>nd</sup> amendment rights." K.A. stated that he had "some connects," and Abdul-  
 12 Jabbaar asked K.A. to "hook a ninja up on the connect." Abdul-Jabbaar then specifically  
 13 asked for a .40 caliber handgun ("bout a 40 cal") or a 9mm handgun ("if I cant get a 40  
 14 cal then I'll run with a 9mm"). After this exchange, K.A. and Abdul-Jabbaar traded  
 15 several messages attempting to meet with each other in person.

16 21. On November 24, 2014, at 4:27 p.m., Abdul-Jabbaar sent a message to  
 17 K.A. stating, "I'm going to ferguson," and he later told K.A., "Can you just sit back and  
 18 do nothing. White motha fuckas killing us like our lives ain't shit . . . Homeland  
 19 security, national guard, and police are strapped to kill protester[s]." Later on November  
 20 24, 2014, K.A. sent a message to Abdul-Jabbaar stating, "No indictment." Abdul-Jabbaar  
 21 replied, "Time to kill a cop."

### CONCLUSION

22  
 23 22. Based on the above facts, I respectfully submit that there is probable cause  
 24 to believe that JALEEL TARIQ ABDUL-JABBAAR did knowingly and intentionally  
 25 send interstate threats, in violation of Title 18 United States Code, Section 875(c).  
 26

27   
 28 Brett D. Grover, Complainant  
 Special Agent, FBI

1 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
2 presence, the Court hereby finds that there is probable cause to believe the Defendant  
3 committed the offenses set forth in the Complaint.

4  
5 Dated this 15<sup>th</sup> day of December, 2014.

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Brian A. Tsuchida  
United States Magistrate Judge