

**FILED**  
11-13-2019  
CLERK, U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

Case No. 3:19-mj- 1423-JRK

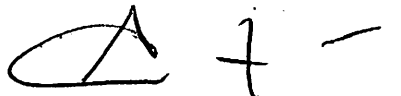
ROMEO XAVIER LANGHORNE

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From at least February 14, 2019, continuing through at least November 11, 2019, in the Middle District of Florida, and elsewhere, the defendant,

knowing that the Islamic State of Iraq and al-Sham ("ISIS") is a designated foreign terrorist organization, has attempted to provide material support to ISIS through the creation and distribution of an instructional video intended to teach followers of ISIS how to obtain materials for explosives without arousing suspicion and combine those materials to make an explosive sufficient to destroy specific types of targets,

in violation of Title 18, United States Code, Section 2339B. I further state that I am a Border Patrol Agent (Intelligence) and Task Force Officer assigned to the Federal Bureau of Investigation Joint Terrorism Task Force, 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



Signature of Complainant  
Armando A. Martinez

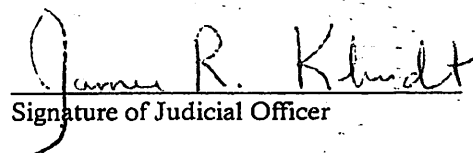
Sworn to before me and subscribed in my presence,

on November 13, 2019

at

Jacksonville, Florida

JAMES R. KLINDT  
United States Magistrate Judge



Signature of Judicial Officer

**AFFIDAVIT**

I, Armando A. Martinez, being first duly sworn, hereby depose and state as follows:

**IDENTITY OF AFFIANT**

1. I am a Border Patrol Agent (Intelligence) with U.S. Border Patrol and have been so employed since February 2003. Since May 2014, I have been assigned to the Federal Bureau of Investigation (FBI), Northeast Florida Joint Terrorism Task Force (JTTF). In the performance of my duties, I have investigated and assisted in the investigation of matters involving violations of federal law related to international terrorism and domestic terrorism, including violations of 18 U.S.C. § 2339B (providing and attempting to provide material support to foreign terrorist organizations).

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

**REQUESTED CRIMINAL COMPLAINT**

3. Based on the facts as set forth in this affidavit, I request that a criminal complaint be issued for Romeo Xavier LANGHORNE for attempting to provide material support to a designated foreign terrorist organization, in violation of 18 U.S.C. § 2339B.

JRK

### FEDERAL LAW

4. I am familiar with federal law, Title 18, United States Code, Section 2993B, which prohibits the knowing provision of material support or resources to a designated foreign terrorist organization, or any attempt to do so.

### PROBABLE CAUSE

5. As further laid out below, LANGHORNE is an ISIS supporter, who believes that existing videos available online are inadequate to arm fellow ISIS adherents and others with knowledge on how to manufacture explosives. As a result, LANGHORNE has created and disseminated a video how to make triacetone triperoxide ("TATP"), a deadly explosive. Although the video includes disclaimers about educational purposes, LANGHORNE'S true purpose is to arm ISIS adherents and others with knowledge of how to make TATP by disseminating a video that he believes will not be taken down for terms of service violations. Since at least February 2019, LANGHORNE has been directing an FBI undercover employee (UCE) in the production of a video intended to provide instructions on how to discreetly acquire materials, combine those materials to create an explosive, and deploy the explosive for terroristic purposes in support of the Islamic State of Iraq and al-Sham, referred to herein as "ISIS." LANGHORNE was a resident in the Middle District of Florida at the inception of these conversations and until April 9, 2019, when LANGHORNE relocated to Virginia. <sup>see NOTE, below. A.M.</sup> As described herein, on

November 7, 2019, the UCE provided LANGHORNE with final versions of the

<sup>NOTE</sup> On February 4, 2019, LANGHORNE was observed in St. Augustine, Florida at 35 Master's Drive by FBI surveillance. On March 16, 2019, LANGHORNE was the subject of a St. Johns County Sheriff's Office Suspicious Person report at Panera Bread, located at 600 Tingle Ct, St. Augustine, Florida 32086. The report noted LANGHORNE's address as 656 Francis St. Unit 36, St. Augustine, FL 32084. Reviews of the Google Search Warrant returns reflect five Lyft rides taken by LANGHORNE within the Middle District of Florida during the month of March 2019. On April 9, 2019, agents in Roanoke, Virginia who were conducting surveillance observed LANGHORNE leave the train station in Roanoke and go to his mother's house.

JK

video, and on November 11, 2019, LANGHORNE publicly posted the video to the website BitChute.

## **I. Designation of ISIS as a Foreign Terrorist Organization**

6. On October 15, 2004, the U.S. Secretary of State 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 under section 1(b) of Executive Order 13224. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist 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 (*i.e.*, "ISIS"—which is how the FTO will be referenced herein), 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. In an audio recording publicly released on June 29, 2014, ISIS announced a formal change of its name to the Islamic State. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

## **II. LANGHORNE's Allegiance to ISIS**

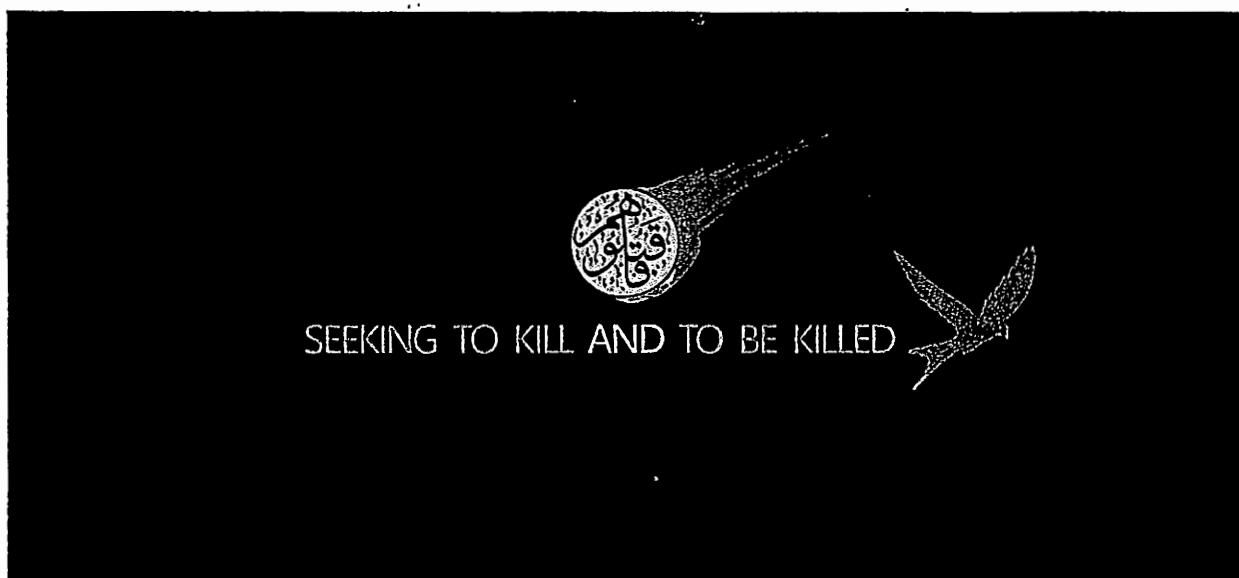
7. LANGHORNE is a 30-year-old United States citizen and long-time ISIS adherent. LANGHORNE first came to the attention of law enforcement in

2014 when he posted on his Facebook account statements and images in support of ISIS and images of LANGHORNE with his face covered in a red kaffiyeh.

8. LANGHORNE maintains a presence on a number of social media platforms, including Twitter, Facebook, and YouTube. On May 24, 2019, search warrants for LANGHORNE's two Twitter accounts with handles @YoRHaJihadi and @YoRHaJihadi17E were issued. *See In the Matter of the Search of a Twitter profile with User ID 1121834201156923393*, Case No. 3:19-mj-1214-JRK; *In the Matter of the Search of a Twitter profile with User ID 958541544625180672*, Case No. 3:19-mj-1215-JRK (collectively, the "Twitter Search Warrants"). On June 26, 2019, Twitter provided information responsive to the Twitter Search Warrants. On November 3, 2019, search warrants for LANGHORNE's Facebook account with User ID 100016879148069, LANGHORNE's Google account with the user name obakifox@gmail.com, and LANGHORNE's Twitter account with handle @YoRHa17E were issued. *See In the Matter of the Search of a Facebook account with the User ID 100016879148069*, Case No. 3:19-mj-1409-JRK (the "Facebook Search Warrant"); *In the Matter of the Search of a Google Account with the user name obakifox@gmail.com*, Case No. 3:19-mj-1410-JRK (the "Google Search Warrant"); and *In the Matter of the Search of a Twitter profile with User ID 1175047546353442816*, Case No. 3:19-mj-1411-JRK. On November 5, 2019, Facebook provided information responsive to the Facebook Search Warrant. On November 7, 2019, Google provided information responsive to the Google Search Warrant. Twitter has yet to respond to the November 3, 2019, search warrant.

9. LANGHORNE has used similar imagery referencing his support of ISIS on multiple of his social media profiles. This imagery includes, most prominently, a cover image reading "SEEKING TO KILL AND TO BE KILLED," which LANGHORNE has used for his previous Twitter accounts @YoRHaJihadi and @Yorha17E and for one of his Facebook accounts.

10. LANGHORNE's Twitter account @YoRHaJihadi reflects that he began to adapt versions of the "SEEKING TO KILL AND TO BE KILLED" logo in June, July, and August 2018. The final version of the logo is seen below:



The Arabic language saying inscribed in the circle has been translated by an FBI Arabic linguist. It says, "Therefore, kill them." In LANGHORNE's Twitter postings, the Islamic motto meaning "therefore kill them" is seen alternately trailing fire or ice and smoke. In one image LANGHORNE posted to Twitter, the logo was superimposed next to a cartoonish image of two individuals at a computer looking alarmed. The individuals in the cartoon are wearing shirts with the logos "NSA"

and "FBI." One image LANGHORNE posted to Twitter on August 4, 2018, is the "SEEKING TO KILL AND TO BE KILLED" motto on a black field. This image features an emblem for Al-Hayat, meaning "life," in the upper right hand corner. Al-Hayat Media Center is the media wing of the Islamic State. This particular image appears to be taken from the Al-Hayat produced video called Flames of War II at 24 minutes and 13 seconds, prior to a car bomb exploding next to foreign soldiers. When he posted this image, LANGHORNE wrote, "Thoughts?" as if seeking approval of his new logo.

11. Information produced by Twitter in response to the Twitter Search Warrants shows that LANGHORNE solicited the services of another Twitter user to develop and refine the above-described images into the "SEEKING TO KILL AND TO BE KILLED" image that he later used on multiple social media accounts. LANGHORNE explained to the other Twitter user "I need that logo (1st one) to be placed into the headline (second one) and I'd like the words kill to be red, and be killed to be light green, like a sort of cyan type of green but a bit brighter in hue". As requested by LANGHORNE, the "SEEKING TO KILL AND TO BE KILLED" language in the final image shifts from red text to yellow to green, and it is followed immediately by a green bird. I know from my training and experience that green birds are viewed by militant jihadis as a symbol of martyrdom and attaining the highest level of paradise.

12. I know based on my investigation of LANGHORNE that he is a prolific user of multiple social media platforms. These platforms include Twitter,

Facebook, and Google/YouTube. LANGHORNE has used Twitter, Facebook, and YouTube to advertise his support of ISIS. Below are selected social media postings made by LANGHORNE reflecting his ideological support for and allegiance to ISIS:

- a. On July 28, 2018, LANGHORNE, using the YouTube account with moniker "Takbir Jihadi" uploaded a video to Youtube entitled "The Battle of Hearts and Minds." Returns from the Google Search Warrant show that the "Takbir Jihadi" YouTube moniker is associated with LANGHORNE's Google account obakifox@gmail.com. I know through my training and experience that "The Battle of Hearts and Minds" is one of Anwar al-Awlaki's extremist speeches. Al-Awlaki was a senior recruiter and motivator for the foreign terrorist organization al-Qaeda. Al-Awlaki was killed by the United States in a drone strike in 2011. "The Battle of Hearts and Minds" speech is further described below.
- b. On December 18, 2018, LANGHORNE, using the YouTube account with moniker "Takbir Jihadi" uploaded a video to Youtube entitled "indeed your lord is ever watchful." This video is a lengthy speech released by ISIS in 2014 and contained the first official instructions by the Islamic State for its supporters to kill non-Muslims in Western countries.
- c. I know based on my training and experience and research that the "Takbir" is the Arabic name for the expression of the words "Allahu

Akbar,” which means “God is the greatest.” This phrase is often used as an exaltation and motivational phrase. This phrase is also commonly used by Islamic terrorists as a battle cry just before engaging in terroristic acts. For example, in August 2019 in Sydney, Australia, a man killed a woman and injured others as he stabbed them while yelling “Allahu Akbar.” After September 11, 2001, the FBI released a handwritten letter found in hijacker Mohamed Atta’s suitcase that urged attackers to shout “Allahu Akbar” because the phrase strikes fear in the hearts of the non-believers. My research shows that several other Islamic militants have used the phrase in the process of carrying out terrorist attacks, including the Fort Hood Shooter, the Times Square bomber, and the Charlie Hebdo gunmen. I also know that a Jihadi is a person involved in jihad, or an Islamic militant. Jihad is the “struggle,” both in the internal sense – to be a better Muslim – and in the external sense – as a defense of the faith, armed struggle, and holy war. Based on my training and experience and my familiarity with this investigation, I assess that by using the display name of “Takbir Jihadi,” LANGHORNE intends to convey his support of Islamic extremism.

- d. On December 18, 2018, LANGHORNE made the following post on his Facebook page: “New uploads to my YouTube channel soon. Inshallah”. I note that “Inshallah” is a phrase that translates to “if Allah wills it.” On or about December 18, 2018, Facebook user

commented on LANGHORNE's post, stating "Assalamu alaikum wa rahmatullahi wa barakatuh akhi. What is the link to your you tube channel?" LANGHORNE responded, "@takbijihadi they took down one of the videos I uploaded that had adnani so... I'll have to find a way to work around it." then replied, "@Romeo X Langhorne bro they are taking down everything. Same on TG. They B dying N Tur Rage." I assess from my training and experience that "Adnani" refers Abu Muhammad Al-Adnani, who was the senior spokesman for ISIS. Al-Adnani was killed by a U.S. airstrike in 2016. I assess that "TG" refers to the encrypted social media application Telegram. I am aware based on my training and experience that terrorist and extremist groups and sympathizers utilize Telegram to recruit new members, fundraise, incite to violence, and coordinate terrorist activity.

- e. On April 14, 2019, LANGHORNE, using Twitter handle @YoRHaJihadi, commented on a tweet advertising a talk related "recent attacks." I assess "recent attacks" to refer to incidents that had occurred on March 15, 2019, in which a man was attacked with a hammer outside an East London mosque hours after forty-nine people were killed in an attack on two mosques in New Zealand, and on March 30, 2019, when a man was found fatally stabbed near a central London mosque. At one point in the Twitter reply thread,

LANGHORNE stated, "But what if I want an Auto mag 3, hand gun."

A Twitter user responded, "Well why would you want that?"

LANGHORNE replied, "It shoots fireballs." The other Twitter user responded "fam that looks so edited LOOOOL." After some further back and forth, LANGHORNE commented, "Just think of how cool it would look to fireball someone." The other Twitter user then stated, "considering u got jihadi in your name and your pinned tweet is ISIS I'm gonna go out on a limb here and say you don't particularly like Muslims." LANGHORNE responded, "That deduction is entirely the opposite direction of where all the evidence you just mentioned goes." The other Twitter user responded, "in what way." LANGHORNE responded, "In the most obvious way. Look at my header." This statement was posted over an image of the "TO KILL OR TO BE KILLED" image, described above. I assess that, in this comment thread, LANGHORNE publicly affirmed that he identified as a follower of ISIS.

- f. On April 17, 2019, just after the Cathedral of Notre Dame in Paris suffered a widely-reported and devastating fire, LANGHORNE participated in a conversation on Twitter about the fire. When the conversation turned to ISIS's destruction of ancient ruins in Palmyra, one user commented, "[ISIS] took defacing, desecrating and destroying very seriously. Evil... not flippant. But you probably don't care

anything about actual ISIS, or , for that matter, and just want to make points for for [sic] your cult.” LANGHORNE responded to this conversation thread using Twitter handle @YoRHaJihadi, stating, “I wouldn’t say we were evil, just following theocratic doctrine.” In response to LANGHORNE’s comment, Twitter user @ tweeted “Ixnay on the eeway...”, and LANGHORNE, using Twitter handle @YoRHaJihadi, replied “Nah.” I assess that when @ stated “Ixney on the eeway,” he was warning LANGHORNE against using the pronoun “we” when referring to ISIS, which has the effect of identifying LANGHORNE as a member of ISIS.

- g. On October 3, 2019, LANGHORNE, using Twitter handle @Yorha17E, tagged Twitter handle @ and asked “so, tell me of Iraq. There are protests now for some reason?” @ posted several replies, and LANGHORNE then commented, “Should have stayed firm with dawlah.” I know based on my training and experience that “Dawlah al-Islamiyah” is another name for ISIS.
- h. On October 3, 2019, LANGHORNE, using Twitter handle @Yorha17E, tweeted the Al-Hayat Media Center logo in response to a Tweet from handle @ , in which that user stated “I really want the Iraqi gov to be replaced and all but... by who? everyone is asking for a revolution but have no idea for who should tak...”. Al-Hayat

Media Center is the media arm for the Islamic State and produced the ISIS propaganda video Flames of War II.

- i. On October 12, 2019, LANGHORNE, using Twitter handle @Yorha17E, engaged in a discussion with Twitter handle @ (display name ) regarding the status of ISIS. In one of his responses to @ , LANGHORNE stated, "Well, none of the people you mentioned, Defeated the Islamic state, as they still exist & are still in iraq & syria & elsewhere. Extreme bombardment makes life unsafe for civilians, white phosphorus was used with incredible hubris & temerity; but ultimately they remain. Baqiyah." The term "baqiyah" used by LANGHORNE is an Arabic word for "everlasting" or "enduring."

- j. On October 12, 2019, LANGHORNE, using Twitter handle @Yorha17E, commented on a Tweet by Twitter handle @ (display name ) in which @ appeared to criticize President Donald Trump for allowing Turkey to conduct an operation that purportedly resulted in a nine year old girl being severely injured. LANGHORNE responded to @ , stating "There are dozens of videos of children and women killed by US airstrikes in IS held territory between 2015-ish up till earlier this year. Let's not play moral high ground."

k. On October 27, 2019, LANGHORNE, using Twitter handle @Yorha17E, commented on a Tweet by Twitter handle @ (display name ) in which @ had posted a Tweet commenting on an obituary of Abu Bakr al-Baghdadi that had been published by the Washington Post. By way of background, I am aware that on the morning of October 27, 2019, President Trump had conducted a press conference at which he announced that al-Baghdadi had been killed as a result of a United States operation in Syria on October 26, 2019. Prior to his death, al-Baghdadi was the leader of ISIS. LANGHORNE commented about al-Baghdadi "He's a good man. If George Washington was alive today he would undoubtedly be called a terrorist, only difference is he was egalitarian in his approach vs being strongly Christian in so much as calling for a theocracy as opposed to a republic."

### **III. LANGHORNE's Attempt to Provide Material Support to ISIS**

13. Since February 14, 2019, an FBI UCE has been exchanging messages on a secure messaging application with LANGHORNE, who uses the name "Faris Bin Malhama," which translated means "Knight of the Fierce Battle." The UCE and LANGHORNE have engaged in multiple communication sessions, with the conversation continuing through November 7, 2019. Each time the UCE and LANGHORNE communicate via the secure messaging application, the communications are received by the FBI, reviewed, and documented. I have

personally reviewed all of the communications in preparing this affidavit. The most pertinent of these communications are described below, and the entirety of the communications are attached as Exhibit A.<sup>1</sup>

14. On October 10, 2018, an open source review of the secure messaging application showed the Faris Bin Malhama account is associated with telephone number 904- 75. On October 6, 2018, AT&T provided records to the FBI showing LANGHORNE was the subscriber of Cricket Wireless cellular telephone number 904- 75.

15. LANGHORNE and the UCE first communicated on February 14, 2019. Langhorne stated, in substance and among other things, that he wanted the UCE to make a video or series of videos. During the first communication session between the UCE and LANGHORNE, the following conversation ensued:

LANGHORNE (5:09 PM) – Firstly three main target demographics. Firstly, sisters. Secondly those who are waiting and are unsure about attacks (especially civilian) thirdly media correction or memes.

UCE (5:09 PM) – I like the way you think Akhee.

UCE (5:10 PM) – Sisters, are very crucial to our goals in the Ummah. They don't even see our beloved sisters coming at the end of the day Akhee.

LANGHORNE (5:10 PM) – For sisters, I would recommend a series; YouTube if possible, just about Islamic reminders and living in the west (and why living in an Islamic society has unique advantages)

UCE (5:11 PM) – Inshallah

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<sup>1</sup> Any redactions are indicated by a black box.

UCE (5:12 PM) – We need strong brothers who are indeed willing to conduct operations here and over there and brothers that know what they are doing!

LANGHORNE (5:14 PM) – Yes, the best utilization would be to have a web series (again if possible on YouTube that would best) and it could be a series covering daily reminders, the difference in western and Islamic culture, how to have modesty and how to be a good wife. Further more, there should be influences on target practicing or encouraging brothers to accept the needs of the ummah, that being jihad. THIS part specifically should be outlined over time, and should focus on having empathy for the ummah and then hatred for the kuffar, but in a subtle way by exposing their ideological absurdities.

LANGHORNE (5:15 PM) – Hmmm...

UCE (5:15 PM) – Mashallah Akhee. You are very knowledgeable!

LANGHORNE (5:15 PM) – Well, when it comes to brothers there are two things with that, one. Proper videos are needed, can explain if asked. And better videos on how and why jihad is needed.

Later in conversation LANGHORNE messaged:

LANGHORNE (5:55 PM) –Your most optimal bet, is to introduce things starting off with part of what anwar said in the battle of hearts and minds video

LANGHORNE (5:55 PM) – Regarding the rand corporation and their plans to westernize islam

LANGHORNE (5:57 PM) – And then to progress forward with some information about how the CVE began, how it became a state dependent partner and its endeavors especially the #Think again turn away campaign they attempted and failed horribly.

Based on my training and experience I assess that “anwar” refers to Anwar al-Awlaki, who was a senior recruiter and motivator for the foreign terrorist organization al-Qaeda in the Arabian Peninsula. Al-Awlaki was killed by the United States in a drone strike in 2011, but his influence has lived on through his numerous extremist propaganda videos and statements. Al-Awlaki’s videos and writings

remain highly popular with Islamic extremists and jihadists on the internet, where they continue to be readily accessible. I also know through my training that the "the battle of hearts and minds video" is a reference to one of al-Awlaki's extremist speeches. The following are excerpts from Al-Awlaki's Battle of Hearts and Minds speech:

Dear brothers and sisters we are not only victims, of U.S. military and political aggression, but we are also victims of U.S. lies! They have been lying about our brothers, charging them with false accusations, until they put hatred of them in our hearts, and they have planted the seeds of disunity amongst us!...we are victims of this Western media and U.S. lies. We need to be aware! We need to be careful.

\* \* \*

What I really fail to understand, is how can the martyr, the Shaheed, who willingly and happily, hands over his soul to Allah, who walks towards his faith, with pleasure, and faces death with a smile, what I fail to understand is how can you call such a person a 'coward'!

16. On February 17, 2019, LANGHORNE and the UCE continued their communications. During the exchange of messages, LANGHORNE stated, in substance, that he wanted the UCE to make an explosive video and provided specific instructions to the UCE as to what information the video needed to contain, as shown below:

LANGHORNE (7:13 PM) – Two videos that could use production

LANGHORNE (7:13 PM) – Is first and foremost an explosive video

LANGHORNE (7:14 PM) – Now the creation of such a video and sending it KNOWING It'll be used for crime in anyway, of course is illegal and would

have the ATF at your doors faster than the FBI. Now then. On such a video three things are needed.

LANGHORNE (7:15 PM) – One: the video must be said it's for scientific purposes only and not to be used in any crimes.

UCE (7:15 PM) – Inshallah

LANGHORNE (7:16 PM) – Second: such a video must show proper yield to explosive equipment gained. Not just the amount of explosive you'll have after its creation but how much that specific amount has in demolition power. This should be done in yields the common man can understand, example, X amount will destroy a car, x amount 1 story building, x amount 2 story if place properly, and X amount for a 3 story building.

LANGHORNE (7:19 PM) – Third: such a video needs to show two things, how to obtain the catalyst needed, one being sulfuric acid (easily obtained via car batteries.) the other being hydrochloric acid. Easily purchased in a variety of ways within the US and SOME European counties. My recommendation is the utilization of a school, claim to be a science teacher there and pay for said equipment with an old burner Visa card

LANGHORNE (7:20 PM) – Again yields are needed for both types

17. The February 17, 2019, conversation continued. Beginning at 7:43 PM the following messages were exchanged:

UCE (7:43 PM) – I'm all in with the fireworks video as first one to be produced. Do you have thoughts on where to set the fireworks off? List in order

LANGHORNE (7:43 PM) – A back yard is nice and safe

LANGHORNE (7:44 PM) – Or perhaps a heavily wooded area that is unlikely to catch fire.

LANGHORNE (7:45 PM) – If you can get clearance from local contractors on an abandoned building, that would also be great.

UCE (7:46 PM) – How's that helping the Ummah and the cause.

LANGHORNE (7:46 PM) – How does it not????

Scientific knowledge is needed when someone is either under siege or clearing tree roots.

LANGHORNE (7:47 PM) – For example, the people in Yemen who are starving might have use for such a video as they could, get rid of abandoned buildings so that the Houthis cant use them in tribal warfare. That way the need to have peace talks or a cease fire drastically increases.

LANGHORNE (7:48 PM) – Or let's say someone in, Kansas has a stubborn tree trunk they just cant afford to dig up, assuming they have the property size for it, and clear it with their neighbors they could easily just blow up the tree trunk then recoil the area.

LANGHORNE (7:49 PM) – Recoil\*

UCE (7:52 PM) – I'm not here to play these games about blowing up tree trunks in someone's back yard. I was told you wanted to make a very specific video to help in the cause, are you right brother for us?

LANGHORNE (7:52 PM) – Let me ask you this ahki. Are you reading this right now? Are you paying attention?

LANGHORNE (7:53 PM) – Lets say, someone had, I donno these great media ideas for, **abu Saif or the PKK or the IRA** or any foreign terrorist organization  
And this person truly wanted Good.

LANGHORNE (7:54 PM) – He wanted good for whatever cause, not as a means to harm others but as a means to end a war or to end skirmishes by intelligent attacks, planning etc.  
Now let's give this guy a name, we'll call him steve.

LANGHORNE (7:55 PM) – So Steve gets this great ideas. Not because no one else thought of them. But because he's outside of the conflict, he can see things a bit differently than those in combat situations.  
So Steve, in his earnest hope to save lives and make things better for the PKK for example.

LANGHORNE (7:56 PM) – Request the PKK to create videos  
Now, steve gets on telegram, and gets a contact through a contact through another contact  
Steve, thinking he'll help change things for the better, with good intentions.

Asks this PKK person to go ahead and create some specific types of videos for him.

LANGHORNE (7:57 PM) – Now while he's requesting and going over these videos

LANGHORNE (7:58 PM) – The person in question, asks questions subtly, ya know what area ya from, when is a good time to talk? How is work? What do you do for work.

Etc

And every now and then.

The person in question, let's say bob

Asks him to clarify some of the things he speaks of.

LANGHORNE (7:59 PM) – Bob would say something like "oh hey, so you want these explosive videos, to focus on blowing up buildings right? Well, what kinda building around you, would you blow up, if ya could? Is it a two story or a one story building?"

LANGHORNE (8:01 PM) – And of course steve says, "well it's a two story" and bob goes on to say "well, is it a government building or just a residential or what?" So then steve says it's a office of some kind, nothing important and then bob meanwhile says "well I'm making the video but would you like to buy some of the supplies in advance so you could make a small batch or explosives on your own?" And then steve says sure.

LANGHORNE (8:02 PM) – Next thing ya know. Steve gets a knock at his door 3 days later after bob confirmed that steve had the materials, and steve gets arrest on multiple felon charges.

LANGHORNE (8:03 PM) – Turns out bob was an FBI field agent and thought he could get steve at least 20 years in prison because steve might be dangerous. Now although steve had good intentions the point is he was talking with a FTO, so that automatically gives steve a 20 year minimum sentence for trying to provide aid to a foreign terrorist organization On top of the charges for having explosive materials on top of attempting to provide some form of support

LANGHORNE (8:04 PM) – Now steve at this point is facing, probably 45 to 50 years in prison, maybe 35 if he takes a plea deal.  
So let me end this story with this statement

LANGHORNE (8:05 PM) – I'm not steve. I'm not dumb enough to follow in the hopefully footsteps of steve.

LANGHORNE (8:06 PM) – Now I'm gonna tell ya this one last time so we're clear, you're the one in need here not myself. Life continues as it does. Don't ask me any questions that you don't need to. Nor question why in instruct you a certain way. With utmost respect ahki, these questions your asking are not only tedious and a waste of time but frankly annoying. I have no ego to be played nor a need for money or fame.

LANGHORNE (8:07 PM) – So when I tell you to make whatever, and I clarify what it's for who it's for and what the focal point are. That's it.

Don't ask for anything else.

Nor question anything I asked.

Ever

Because I'm not going to end up like steve

In the above messages between LANGHORNE and the UCE, LANGHORNE appears to be concerned that the UCE might be a federal agent. LANGHORNE told a story involving two characters, Bob and Steve. I assess this story to be an allegory in which Steve (LANGHORNE) wants to provide material support to a terrorist organization but ends up being arrested by Bob ("FBI field agent").

18. The February 17, 2019, conversation continued. Beginning at 8:08 PM the following messages were exchanged:

LANGHORNE (8:08 PM) – Now you get to work on what I said, as I said and you finish it.

You do that, then we can talk more. Other than that, theres nothing more to say here

I don't like you questions

And I don't like how you're questioning the nature of what I asked

A man blowing up a tree trunk is the same as a man blowing up a building, the materials used are the same

LANGHORNE (8:09 PM) – And the process to acquire those materials are also the same

Now wither or not that building has people in it, or that tree has termites in it, doesn't matter. In both scenarios the building and the tree stump are destroyed

LANGHORNE (8:10 PM) – Now you go make my video  
Or I'll out you right here and now as a federal agent  
And I don't give a single fuck what you have to say  
You have your orders, Do it. And i don't care who gave you tazkiyah  
Or if Baghdadi himself vouches for you

I know from my training and experience that "Baghdadi" refers to Abu Bakr al-Baghdadi, then the leader of ISIS. In 2014, ISIS announced the establishment of a worldwide caliphate (concept of a single Islamic world government) and al-Baghdadi was named its caliph (leader). Under al-Baghdadi's leadership, ISIS's ideology has been to promote religious violence, and regards Muslims who do not agree with its interpretations as infidels. ISIS is known for its extensive and effective use of propaganda. ISIS has extensively utilized social media, particularly Twitter, to distribute its messages. As noted above, on October 27, 2019, President Trump announced that al-Baghdadi had been killed in a United States operation in Syria. I also know through my training and experience that "abu Saif," "PKK," and "IRA" (all referenced by LANGHORNE in the above conversation) are all terrorist organizations. Abu Saif, also known as Abu Sayyaf, is a terror organization that seeks to establish an independent Islamic state in the southern Philippines. "PKK" is a reference to the Kurdistan Workers Party and "IRA" is a reference to Irish Republican Army, both designated terrorist organizations.

19. The conversation continued. Beginning at 8:15 PM on February 17, 2019, the following messages were exchanged:

JAK

LANGHORNE (8:15 PM) – Whatever your about to fucking say it doesn't matter to me. Either you make the video and you prove you aren't a fed, or you say whatever you're gonna say, and don't make the video and prove you are a fed.

UCE (8:21 PM) – Okay, now that you are done, let me tell something...you think you know a lot and yet you have done nothing for the cause and sit you on your computer all day long and come up crazy stories like the one above. There is no need for you to flip out and talk as long as you have. I have not asked you any specific questions on anything besides what I was told you wanted to talk about.  
And I agree we are done for now.

LANGHORNE (8:27 PM) – You don't need to know if I can make explosives or not  
Nor should you ask how a video on demolition is useful to the ummah. It has obvious implications unless you're an idiot.

20. On February 22, 2019, \_\_\_\_\_, Resident Agent in Charge (RAC) for ATF in Jacksonville Group I, advised FBI Jacksonville that on February 21, 2019, LANGHORNE had called the ATF Jacksonville office. On February 22, 2019, Special Agent \_\_\_\_\_ returned LANGHORNE's call and spoke with him. According to RAC \_\_\_\_\_, LANGHORNE had inquired about how to get an explosive license, whether someone who was on the terrorist watchlist could obtain a license, and what background checks are conducted to become an ATF agent. During the call LANGHORNE identified himself as "Romeo" and provided his contact number as 904-\_\_\_\_\_. 75. On October 6, 2018, AT&T provided records to the FBI showing LANGHORNE was the subscriber of Cricket Wireless cellular telephone number 904-\_\_\_\_\_. 75.

21. LANGHORNE and the UCE again communicated on April 3, 2019, during which the UCE provided LANGHORNE with a one minute four second

video that was produced based on the ideas provided by LANGHORNE. The video begins with a disclaimer, per Langhorne's instructions, which states in substance that the video is being made for scientific and educational purposes. The video then introduces the topic, "TATP Triacetone Triperoxide" and the three topics the video will cover. The three topics are; What You'll Need and Where and How to Purchase, TATP Production Step by Step and Safety, and Volume and Yield. Photos are provided within each section but no instructional information. The video ends with the statement "More To Come."

22. I know based on my training and experience that TATP is an organic peroxide and a primary high explosive. The components that make TATP are readily available and often found in common household items such as hair bleach (hydrogen peroxide) and nail polish remover (acetone). The hydrogen peroxide and acetone can easily be purchased from beauty supply shops, pharmacies, hardware stores, and pool supply stores. The availability of these components makes the production of TATP cost effective and allows potential bomb-makers the ability to purchase them undetected. TATP has been an attractive explosive for extremists. TATP has been used in bomb and suicide attacks and in improvised explosive devices, including the London bombings on July 7, 2005, where four suicide bombers killed 52 people and injured more than 700. It was one of the explosives used by the "shoe bomber" Richard Reid in his 2001 failed shoe bomb attempt. TATP also was used by the suicide bombers in the November 2015 Paris attacks, 2016 Brussels bombings, Manchester Arena bombing, June 2017 Brussels attack;

Parsons Green bombing, the Surabaya bombings, and the 2019 Sri Lanka Easter bombings.

23. On April 3, 2019, after LANGHORNE received the video from the UCE, the following conversation took place:

LANGHORNE (5:30 PM) – Perfect. This should be able to be uploaded to YouTube legally as well.

LANGHORNE (5:31 PM) – Now this kinda quality is what's needed. Because it isn't inherently used for crimes it should pass off fine

LANGHORNE (6:07 PM) – This works well. For multiple reason firstly, with the yield we know exactly what we'll need. And can price our efforts accordingly, for material this is also good as we can find adequate supplies based on need and surveillance. For those on a tight leash use car batteries, for those free and suspected to be undetected, you can gather hydrochloric acid.

Works fine

UCE (7:51 PM) – Glad you like it Akhee... this is just the beginning.

LANGHORNE (8:53 PM) – The best yield results in my opinion are, tree trunk, car, 900 square foot room, Half a building. And one full building.

UCE (8:56 PM) – Okay

LANGHORNE (8:57 PM) – As for the hydrochloric acid. You don't or shouldn't need a yield for those scales, if you have extra go for it, if not, please just apply the math to scale the yield amount.

UCE (8:59 PM) – Got it.

24. In reviewing the returns from the Twitter Search Warrants, I observed that on April 4, 2019, LANGHORNE, using Twitter handle @YorHaJihadi, sent a video to Twitter user \_\_\_\_\_, username @ \_\_\_\_\_, via Twitter direct message. The video sent by LANGHORNE was the first video provided to

*JMK*

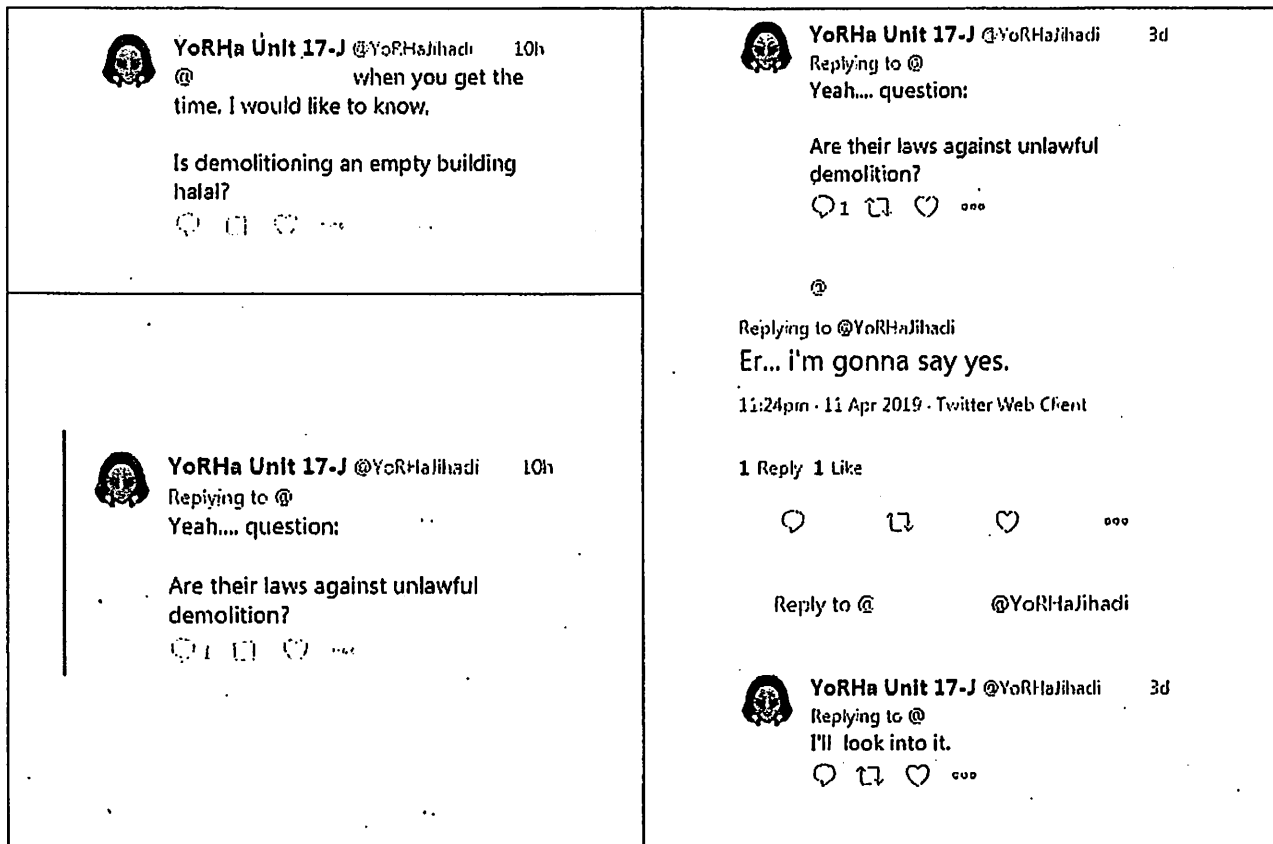
LANGHORNE by the FBI UCE, on April 3, 2019. LANGHORNE later stated, according to the Twitter return, "From my understanding this video should be legal. Could you give me your thoughts? Also look up federal codes if you need to. I'm pretty sure it's in compliance". Also on April 4, 2019, @ responded, in a series of Twitter direct messages, "I can't promise it won't get banned by whatever platform it gets uploaded to. But I can't think of any reason it would violate US law. Taken in isolation, it should not be a legal risk. I am not a lawyer. Actually building the devices is a whole different matter." On the same date, LANGHORNE responded, in a series of Twitter direct messages, "Good then . . . Just want the information out. Anyone who does so on their own is at their own risk. Should work fine . . . That's what I thought it isn't inherently criminal in nature or inciting violence or said to be used by criminals or terrorist. So it should be fine and not in any violation of TOS. That being said I'm waiting for the finished product and we should be good." On the same date, @ responded, in a series of Twitter direct messages, "There is a big asterisk. The person doing the assembly of the devices... without proper licensing... could be in jeopardy. Not my call. Again I'm not a lawyer, and especially not your lawyer." LANGHORNE, via Twitter handle @Yorha17E, has been interacting with Twitter user @ as recently as October 27, 2019.

25. On April 4, 2019, LANGHORNE, using Twitter handle @YorHaJihadi, also sent the same video to Twitter account

JMK

which is handle @ , LANGHORNE asked @ "Just wanted to know if this video seems legal." @ did not respond to his question.

26. On April 12, 2019, LANGHORNE made the following postings:



In these postings, LANGHORNE asked Twitter user @ , via Twitter handle @YoRHaJihadi, "When you get the time, I would like to know, Is demolishing [sic] an empty building halal?" Based on my training and experience, I know that "halal" means "acceptable" or "permissible." The same day, LANGHORNE asked Twitter user @ , "Yeah . . . question: Are their [sic] laws against unlawful demolition?" @ responded, "Er... I'm gonna say yes," and LANGHORNE replied, "I'll look into it."

*John*

27. On April 14, 2019, LANGHORNE, using Twitter handle @YorHaJihadi, sent a Twitter direct message to Twitter user , which is handle @ , stating, "I will need, strength and conditioning, basic marksmanship, being able to fully disassemble and reassemble a few weapons, being capable of jogging multiple miles, being able to run 2 miles, some basic parkour information, some basic parkour training. Knowledge of atypical military tactics and commands, and knowledge of how to breach and clear rooms." LANGHORNE later sent another message to the same Twitter account stating, "It ain't alot your askin to someone determined, issue is, for what I'll be doing I wont need all that. Will need Mil, PT compliance, but ain't gonna need that weighted stuff till later down the line. (Plan on making a shielded suit)".

28. On April 15, 2019, LANGHORNE reached out to the UCE and provided additional instruction for the video. A portion of the conversation is as follows:

LANGHORNE (3:47 PM) – Asalaam alaykum  
Yeah look was going to ask about the work

LANGHORNE (3:48 PM) – Just wanted to make sure in the video when going over using sulfuric acid as the catalyst that you emphasize room temperature control. Trace amounts of sulfuric acid can cause an accidental explosion.

LANGHORNE (3:50 PM) – Which is why safety should be the primary concern of the video.  
Be sure to include (if you haven't finished it) that people should make sure the product is thoroughly distilled and sifted, if possible sift VERY CAREFULLY, a secondary time and make sure its stored at an appropriately tempered area.

LANGHORNE (3:51 PM) – Best case scenario we come out with very fine products that took a considerable amount more time to create, but the purity, yield and safety of the product is paramount.

UCE (8:53 PM) – Wa Alaikum As Salaam Akhee, good info.

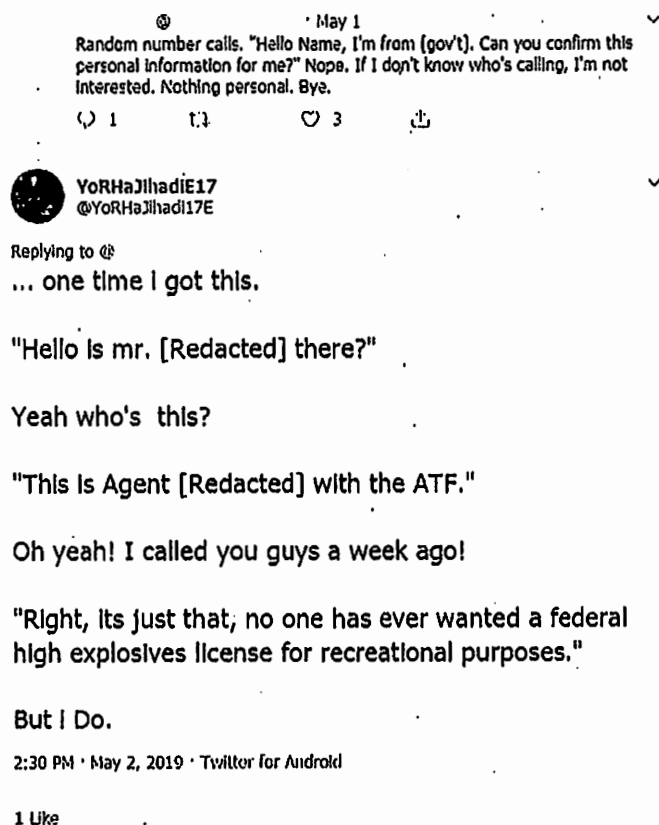
In this portion of the conversation, after being provided the video (described above) on April 3, 2019, LANGHORNE expressed his approval and then provided additional information he wanted added to the next version of the video.

29. On April 19, 2019, LANGHORNE, using Twitter handle @YorHaJihadi, sent a direct message to Twitter user \_\_\_\_\_, which is handle @ \_\_\_\_\_. LANGHORNE stated "Let's just say, I've chosen a different lifestyle that coincides with certain socio-political alignments that are rooted in theological perceptions that most don't share." On April 22, 2019, LANGHORNE received a direct message from Twitter user @ \_\_\_\_\_ in which she asked LANGHORNE, "Why do you talk like a suicide bomber". On the same date, LANGHORNE responded, via Twitter direct message, "You've spoken to ishtihadieen?" On April 23, 2019, @ \_\_\_\_\_ responded "no idea who that is btw". LANGHORNE then responded "An ishtihadieen is a suicide bomber." @ \_\_\_\_\_ responded "I will never pretend to understand you." After some further conversation, on April 23, 2019, LANGHORNE sent a direct message to Twitter user @ \_\_\_\_\_, stating, "I don't plan on blowing myself up at all," and later LANGHORNE sent another message stating, "But the path I'll be on will be dangerous and likely end in death."

JRK

30. On April 20, 2019, LANGHORNE, using Twitter handle @YorHaJihadi, sent a direct message to Twitter user \_\_\_\_\_, which is handle @ \_\_\_\_\_, stating "You're so obsessed and worried about someone calling you an extremist, that you aren't honest enough with yourself to accept the fact that yes, we as muslims to fight in wars, and we do kill."

31. On or about May 2, 2019, LANGHORNE, using Twitter handle @YoRHaJihadi17E, responded to a Tweet from @ \_\_\_\_\_ related to purported phone calls from the government, as shown below:



In his response, LANGHORNE discussed his contact with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) about obtaining a "federal high explosives

Jah

license for recreational purposes.” LANGHORNE later responded to

@ stating “I all honesty i would still have to be compliant with state and federal laws so, it isn’t that odd really, thing is i would need an actual goddamn factory within city/local compliance to make fireworks. Bombs however.... hehehehe.”

32. On or about May 2, 2019, LANGHORNE, using Twitter handle @YoRHaJihadi17E, responded to a tweet posted by user @ . The profile for @ reads “I’m a lawyer and free speech advocate. My Law firm is . Please call me BEFORE your talk to the police.” In the tweet thread, LANGHORNE asked @ “why is it illegal to upload information on bomb making if its created to espouse violence or harm others, but if its for scientific research it isn’t illegal to produce such media? In both cases how to create an IED taught.” I assess that, in this question, LANGHORNE is referencing the statutory language of 18 U.S.C. § 842(p), which makes it a federal felony to distribute information pertaining to the manufacture or use of explosives, destructive devices, and weapons of mass destruction with the intent that the information be used in furtherance of a federal crime of violence.

33. On May 12, 2019, the UCE provided LANGHORNE with an updated version of the TATP video that contained some of the additional information LANGHORNE wanted in the video. After LANGHORNE received and viewed the video, the following conversation took place:

LANGHORNE (6:22PM) – Perfect thus far.

Q/M

LANGHORNE (6:23PM) – The volume & yield specifically has a ratio of good importance.

The tips for safety are also outstanding. As those are the most realistic ways to purchase items required, avoid digital tripwires and maintain a low profile.

LANGHORNE (6:24PM) – Easiest disguises would of course be dense sunglasses, a clean shaven face and a hat.

LANGHORNE (6:25PM) – Normal glasses work just as efficiently if the clothing attire is appropriately matched to convey a teacher aesthetic. Very well done.

LANGHORNE (6:26PM) – Also the mentioning of safety apparel needed is well noted, as the chemical smell it gives off, working with such tools and its hazards are important to note.

LANGHORNE (6:27PM) – The coffee filter is the standard means of filtration, I however am curious if specific brands would allow better yield due to quality of the paper used.

LANGHORNE (6:28PM) – Video so far is coming out perfect, nothing left undone, everything prioritized & mentioned in a way that can be commonly understood.

LANGHORNE (6:29PM) – Of course moving forward.

When it comes to the assembly aspect of this

I would recommend working backwards.

As having a functioning detonator on hand will allow one to detonate if a raid is conducted.

LANGHORNE (6:30PM) – Also keeping a clean and non accountable work environment is also necessary

LANGHORNE (6:31PM) – As forensics will of course take photos and if things appear to be set up for an attack, prosecution can easily win.

LANGHORNE (6:32PM) – However by working backwards, having a detonator could potentially be claimed to have been used with a science experiment (as noted in the opening of the video) with no malicious intent to harm.

*JRK*

LANGHORNE (6:33PM) – As the power source used to detonate could be applied to a variety of other applications. Such as a potato clock, making a jerry rigged, remote controlled item.  
Etc etc etc.

LANGHORNE (6:34PM) – Secondly, TIME. Time must be emphasized in a separate video when it comes to the usage of this.

LANGHORNE (6:35PM) – This initial video is basically how to safely create and use TATP without setting off any federal alarms. Its purpose is not to harm but simply to educate

LANGHORNE (6:39PM) – A follow up video on high value targets, understanding contemporary warfare in comparison to classical Islamic warfare, how to scout locations & people, mental & religious preparation, use of disguises, basic legal information required to appropriately scout without being detected or raising alarm.

When to strike and how,

As well as tactical analysis of active shooting scenarios, law enforcement response & how to successfully leave an area without being caught, are all things for a separate video.

One video being the primer, while the second being the catalyst or detonator.

LANGHORNE (6:41PM) – That being said, this initial video is extremely important as thus far it appears to be legally compliant with US law and thus subject to enter public domain for responses & communication.

LANGHORNE (6:46PM) – That being said, if this video can be published two things will happen.

1: the Islamic world will have a better grasp on how to defend itself with the usage of explosives in a reasonable & safe manner.

2: everyone who sees, uploads, reuploads & shares this video will be aware of how to safely and accurately create & use explosives.

Which means the list of potentially dangerous people escalate from being small and well managed to being completely useless as everyone becomes a tier 1 threat.

As a result of that, it is possible

That people of interest within the Islamic field will be taken with more precaution & treated better as the results of upsetting a suspected terrorist will only exacerbate any hostilities they already have thus endangering others as a result.

LANGHORNE (6:47PM) – A few other notes

LANGHORNE (6:51PM) – If this video is produced and is fully legally compliant the main stream media of course will remark on the video which will only cause it to spread even further thus educating even more people, when the backlash happens of trying to the information curiosity will compel even more people to seek it out and watch it, which in turn only helps everyone as this information becoming general knowledge is extremely useful to the world as a collective. Example, (Venezuela, Libya, France, Yemen, Northern China, Burma, Palestine, Syria, Saudi & Iran)  
Each place has political turmoil, the information provided can & would assist the general population against the corrupt or oppressive people.

In the conversation above, LANGHORNE stated his true intention – to provide information on how to make explosives so that “the list of potentially dangerous people escalate from being small and well managed to being completely useless as everyone becomes a tier 1 threat.” LANGHORNE additionally specified that his target audience was “people of interest within the Islamic field” and that his intended result was that any response to Islamic extremism be done with “more precaution” due to the risk of “upsetting a suspected terrorist.” In other words, here LANGHORNE expressed his desire to radicalize and mobilize a sufficiently large group of Islamic extremists as to make response and control futile. LANGHORNE additionally made reference to the video being “fully legally compliant” so that it will spread through legitimate channels even though, based on LANGHORNE’s statements to the UCE, his true intent – to support ISIS through dissemination of the video – is clear. LANGHORNE stated his view that the information will be extremely useful to the world and provided specific examples of Venezuela, Libya, France, Yemen, Northern China, Burma, Palestine, Syria, Saudi and Iran as

examples of countries with political turmoil and where the information in the video would “assist the general population against the corrupt or oppressive people.”

According to LANGHORNE, as a result of the dissemination of the video, “the Islamic world will have a better grasp on how to defend itself with the usage of explosives.”

34. The conversation continued. Beginning at 6:54 PM on May 12, 2019, the following messages were exchanged:

LANGHORNE (6:54PM) – It is my honest belief that if & when you finish this, this deed will live on forever, as the information becoming public knowledge will only be a Good thing as it evens things into a more balanced state between civilians & governments, knowing that the supplies are easy to obtain, proper yields will be established to be used correctly, safety being the priority will allow even the most basic of intelligent people to produce the means to defend themselves against hostile powers.

LANGHORNE (7:00PM) – Once this video is complete

LANGHORNE (7:01PM) – If you’re willing to make a secondary video that will change current Islamic warfare, let me know. As that video in particular will let us win this battle of hearts and minds, once and for all.

LANGHORNE (7:02PM) – MayvAllah reward you well for your work, & remember to stay safe.

UCE (7:12PM) – Will update the video with your suggestions....once project is complete will work with you on secondary project.

LANGHORNE (7:13PM) – Great

35. On approximately May 16, 2019, LANGHORNE changed his Facebook cover picture for one of his Facebook accounts to the “SEEKING TO KILL AND TO BE KILLED” image.

36. May 26, 2019, LANGHORNE, using the YouTube account with moniker "Takbir Jihadi," uploaded a video to Youtube entitled "Baghouz Nasheed" The video features footage from bombings in the area of Baghouz, Syria, and reports that 3000 Muslims died and states their only crime was that they said "Our Lord is Allah." The video features a nasheed in the background urging Muslims to take up their weapons as there is no honor except in Jihad for Islam. Also on May 26, 2019, LANGHORNE, using the "Takbir Jihadi" YouTube account, uploaded a video to YouTube entitled "Islamic State-2019: Chaliph Abu Bakr Al Baghdad's Public Address." In this video, Abu Bakr al-Baghdadi recognizes the efforts of ISIS and suggests that the brothers avenge those who have died for the cause. Al-Baghdadi states that Allah ordered Muslims to wage Jihad and that the Tawaghit may be contained by Jihad. The video was produced by the Al-Furqan Foundation, a media arm of ISIS. Information provided by Google in response to the Google Search Warrant reflects that Google suspended LANGHORNE's "Takbir Jihadi" YouTube account the same day.

37. On June 24, 2019, the UCE provided LANGHORNE with another updated version of the TATP video produced utilizing the guidance provided by LANGHORNE. After LANGHORNE received and viewed the video, the following is a portion of the conversation that took place:

LANGHORNE (7:17AM) – everything appears, fine. Looks like all bases are covered, it's fool proof.

*JRK*

LANGHORNE (7:18AM) – Yeah I'd say the information given is perfect. Nothing could possibly go wrong. With safety being fully accounted for all that's left is the yield amounts, creation and demonstration.

LANGHORNE (7:19AM) – I imagine the detonation of a building is something unlikely to be easily done.

LANGHORNE (7:20AM) – However if the math utilized can be proven to work with the yields given that demonstration won't be needed due to scaling and solvable math.

LANGHORNE (7:21AM) – I do wonder if this information will be useful to people as much as I believe it will

LANGHORNE (7:22AM) – Of course. None of this is expert advice on my part.

38. The conversation continued. On June 24, 2019, at 7:32AM the UCE told LANGHORNE the volume and yield amounts will be in the final video.

UCE (7:32AM) – Working on the volume and yield amounts will have that in the final video.

LANGHORNE (7:33AM) – Good.

UCE (7:36AM) – For the tatp instruction part I was thinking about putting in hyperlinks, what do you think?

LANGHORNE (7:37AM) – What for?

LANGHORNE (7:38AM) – I suppose a detailed description of the product?

UCE (7:38AM) – Exactly. Yes.

LANGHORNE (7:38AM) – Well if you do, it has to be in two sets. One for whatever product your listing and one from wikipedia explaining the product.

Based on the earlier conversations between LANGHORNE and the UCE, "volume" and "yield," referenced here by the UCE, are critical elements LANGHORNE wanted included in the TATP video. As shown above, on February 17, 2019,

LANGHORNE wrote to the UCE, "video must show proper yield to explosive equipment gained...This should be done in yields the common man can understand, example, X amount will destroy a car, x amount 1 story building, x amount 2 story if place properly, and X amount for a 3 story building." On April 3, 2019, LANGHORNE wrote to the UCE, "The best yield results in my opinion are, tree trunk, car, 900 square foot room, Half a building. And one full building." And on May 12, 2019, LANGHORNE wrote to the UCE, "The volume and yield specifically has a ratio of good importance."

39. Following the above portion of the conversation, on June 24, 2019, the UCE sent LANGHORNE three open source website links on how to make TATP. LANGHORNE responds with the following messages:

LANGHORNE (7:46AM) – Hmm...the hydrochloric explanation is good but leaves out the fact that metal cant be used when making the product. Then again the first one does as well.

LANGHORNE (7:47AM) – You're call, I'd just emphasize that meatl cannot or should not be used when creating your product. Unless used for chilling items used in conjunction with the product.

LANGHORNE (7:48AM) – I.e a metal bowl filled with liquid nitrogen to retain a low temperature while preparing your product. Or a metal bowl made into an ice bath prior to utilizing a mixture.

UCE (7:49AM) – Can make that clear in the final version.

40. The conversation continued. Beginning on June 28, 2019, and continuing through July 2, 2019, LANGHORNE provided instructions to the UCE for a nasheed LANGHORNE wanted made. I know from my training and experience that a nasheed is a work of vocal music. In Islam a nasheed is a song that

carries with it an Islamic belief, practice, etiquette or lesson. Terrorist organizations, including ISIS, produce nasheeds that convey a message of violence that furthers their extremist rhetoric and propaganda. The following are portions of the conversation:

LANGHORNE (June 28 - 7:20PM) – Know anyone who can make a nasheed?

UCE (June 30 - 1:48PM) – Let me ask around...what kind of nasheed(s) are you looking for? What do you want them to be about?

LANGHORNE (June 30 -- 8:31PM) – I want a nasheed that uses the sounds of the battlefield as music. Since that isn't haram.

I also know from my training and experience that if something is "haram" that means it is forbidden by Islamic law.

41. The conversation continued. Beginning at 11:26 AM on July 2, 2019, the following messages were exchanged:

LANGHORNE (11:26AM) – Firstly I need a handful of sounds and one in particular I have only ever seen once.  
During the prison break dawlah did there was a man recording. And he gives a loud takbir at the second explosion

LANGHORNE (11:27AM) – I want that specific takbir  
And a few other takbirs that are good as well  
Next we'll need a few sounds effects  
<https://youtu.be/MOwAggz3sv0>

The above link sent by LANGHORNE is to a YouTube video titled, "Kill Them All! (Pennywise)." LANGHORNE then sent the following:

LANGHORNE (11:28AM) – Just the children saying kill them all

LANGHORNE (11:29AM) - <https://youtu.be/euWNcINRVsU>

*JMK*

The above link sent by LANGHORNE is to a YouTube video titled, "Moab 1080p 30fpd with Sound." The description of the video states, "This is an explosion in a remote desert city. The MOAB weighs more the 10,000 kilograms and contains 8,164 kilograms of explosive. Its explosion has a blast..." LANGHORNE then sent the following:

LANGHORNE (11:30AM) – This particular explosion and that of white phosphorus if you can find it

LANGHORNE (11:33AM) - <https://youtu.be/Z1NbZrWGexQ>

The above link sent by LANGHORNE is to a YouTube video titled, "Learn To Speak Their Language." The conversation continued between the UCE and LANGHORNE:

LANGHORNE (11:34AM) – 3:37 – 4:02  
Opening  
I have the lyrics down

LANGHORNE (11:35AM) – The opening is critical though if the audio can be cleaned and enhanced a bit for sound that's perfect

LANGHORNE (11:36AM) – In short the song is about retaliation.  
Fatuluhum, or Kill them all  
The chorus is kill them all,  
And it repeats five times inbetween the lyrics

LANGHORNE (11:38AM) – Amidst gunfire, bombs, recitations and kill counts (done to muslims. We list a country then the amount of muslims killed as a result of US "intervention" or war. Speaking the name of the country then a simple number. Example. Libya, 200,000. Yemen, one million. Etc etc etc.

LANGHORNE (11:39AM) – I'll explain in further detail a bit later. But the premise of the nasheed is to encourage justified retaliation  
Hince. Kill them all

LANGHORNE (11:40AM) – Side not: once the video is finished we'll hold on to it for a bit. I've got to speak to a federal or criminal defense attorney to make sure it's compliant with ATF regulations.

Then we publish

And encourage others to spread it as well. If it's fully compliant with US law. This info can and will change the world for the better, forever.

LANGHORNE (11:41AM) – As defense against tyranny is needed by everyone but ESPECIALLY muslims.

I know from my training and experience the term "Dawla" translates to "dynasty" or "state," and commonly is used to refer to the terrorist organization ISIS. The term "takbir" used above refers to the expression in Arabic "Allahu Akbar," which means "God is great." This phrase is used as an exaltation and motivational phrase. The phrase is also well-known for its common use as a battle cry in Islamist extremism and Islamist terrorism, as described above. I further know that the YouTube video sent to the UCE by LANGHORNE titled "Moab" is about the United States large-yield bomb commonly known as the "Mother of All Bombs" or "MOAB." I also know that "white phosphorus," referenced by LANGHORNE refers to a material made from a common allotrope of the chemical element phosphorus that is used in smoke, tracer illumination, and incendiary munitions. Finally, in the above conversation LANGHORNE used the term "Fatuluhum" followed by "or Kill them all." Based on my training and experience, I assess LANGHORNE meant to use the word "Fa-ug'tuluhum," which he misspelled. Fa-ug'tuluhum is translated "then kill them."

42. LANGHORNE and the UCE continued their communications. On August 1, 2019, the UCE explained to LANGHORNE that the final version of the

video was near completion. The UCE then told LANGHORNE that he needed to travel for an urgent project for Dawlah al-Islamiyah, referring to ISIS, and once he returned, the final touches would be completed on the video.

43. On September 15, 2019, the UCE reached out to LANGHORNE again to let him know that he was still busy working with Dawlah al-Islamiyah or ISIS.

The following messages are a portion of the conversation:

UCE (4:24PM) - Still busy working with the brothers from the Dawlah al-Islamiyah...I will text you as I return Akhee. The project will get completed once I'm back.

LANGHORNE (5:04PM) – Take your time

44. On November 5, 2019, the UCE reached out to LANGHORNE to let him know that he was back from “Dawla,” referring to ISIS, safe and sound. The following messages are a portion of the conversation:

UCE (9:26PM) – I just wanted to let you know I made it back from the Dawla al-Islamiyya safe and sound.  
I will have your video before the end of the week.

LANGHORNE (9:39PM) – Cool

45. On November 7, 2019, the UCE sent LANGHORNE the final version of the TATP video. In preparing the final version of the video, I and others on the investigative team consulted with FBI Senior Scientist Dr. [redacted] regarding the inclusion of a formula in the video that would be likely to appear to LANGHORNE to be the formula for TATP but, in fact, would produce an inert product. The final version contains the inert TATP alternative formula and yield amounts purportedly required to destroy a tree trunk, car, and house. Dr. [redacted] advised that, because

the TATP alternative formula produces an inert product, the yield multipliers provided in the video likewise would not result in the product being sufficient to destroy any of these targets. The video also contains demonstrations of a tree, car, and barn being exploded. Three versions of the video were provided to LANGHORNE. One version contained no music and two versions contained nasheeds LANGHORNE had previously suggested the UCE use as background music. After sending the first version, without music, the following conversation took place:

LANGHORNE (12:16PM) – That was well made  
A bit, unusual....  
But well done

LANGHORNE (12:17PM) – Alright, so do you have TOR and or a decent VPN service?

LANGHORNE (12:18PM) – I'm surprised you had a car to waste  
But a necessary sacrifice for science.

LANGHORNE (12:19PM) – More surprised you could actually demolish a barn.  
How exactly did you manage to do that, even in a rural area, with no one saying anything?????????????  
The sound effects from the blast alone would have been heard for several miles

LANGHORNE (12:20PM) – Well, doesn't matter. The video appears to be legal, well scripted, shows proper yield, creation and where to obtain supplies.

LANGHORNE (12:21PM) – I suppose storage could have been an issue, however, that's something you actually have to have a federal explosives license to have. So I'm pretty sure if you're just getting rid of a stump or...car. It's fine, assuming local/state laws & no one is injured.

*JRK*

46. On the same day, November 7, 2019, at 2:13 PM and 2:35 PM, the UCE forwarded LANGHORNE the second and third TATP video versions (with nasheeds). The following is a portion of the conversation:

LANGHORNE (2:48PM) – Yeah 2 is pretty solid.  
I think it'll have a more general appeal to muslims.

UCE (2:56PM) – Agree Akhee.

UCE (3:04PM) – Now, since the first set of videos are finished do you still want to work on another set of videos?

LANGHORNE (3:18PM) – Ahh ahh...  
Aye\*  
Gonna need to let this cool down a bit though.

LANGHORNE (3:19PM) – Talked to my lawyer and waiting to see if he and a couple other people mind reviewing it  
From my perspective looks 100% clean and legal  
However if you'd like, you can do a test run of the product  
You familiar with **bitchute**?  
It's a video streaming platform like youtube  
Cept it's more wild west out there.

LANGHORNE (3:20PM) – So here's what we'll do  
Either you or I will upload to it.  
Give it some time and wait to see how it does. I already out flames of war 2 up, never got taken down. So I assume its safe to upload other information and videos there

I know from my training and experience and research that BitChute was launched in January 2017 and is a peer-to-peer video sharing platform based out of the United Kingdom. BitChute promotes its mission of putting people and free speech first. According to BitChute's Community Guidelines, BitChute aims to provide individuals a platform where they can express their ideas freely and opposes censorship. Instead of using central servers, BitChute utilizes WebTorrent.

WebTorrent is a BitTorrent client, written in Javascript, that runs in the web browser. The first time a file is shared, there is a single seed (the individual who is uploading the file). As the video is downloaded by other users, the other users then become seeders themselves, meaning that future users will obtain portions of the content from numerous other users. According to a March 2018 Twitter post from BitChute's official Twitter page, users must open a WebTorrent desktop client, copy the link location of the video they wish to download, and then utilize the WebTorrent desktop client to download the video. Once the video has fully downloaded, it will start seeding automatically. By operating in this way, BitChute decentralizes the locations at which its content is hosted.

47. I know from my training and experience and research that BitChute is favored by extremists because of its permissive environment.

48. Based on a review of the Google Search Warrant return, LANGHORNE received an email on October 1, 2019, from the email address support@bitchute.com with the subject "BitChute Email Verification" which contained a link for LANGHORNE to reset the password for his account. According to the email, LANGHORNE's BitChute account uses the name "YORHAJIHADI." Later the same day, LANGHORNE received a subsequent email from support@bitchute.com with the subject "Your video is ready on BITCHUTE." The video that LANGHORNE had uploaded to BitChute was Flames of War II, an ISIS propaganda video, further described above.

*Jma*

49. On October 24, 2019, LANGHORNE sent an email to cyberneticjesus@gmail.com with the subject line "BitChute," in which LANGHORNE stated "Having trouble uploading videos, I have a decent number of videos I'd like to upload and can't seem to continue uploading. Yes they are ISIS videos, the reasoning for this is that the media in snuffing and suppressing this information heavily and I feel that journalistic integrity demands that people have free and open access to the information without being put on a list for having viewed the videos in question, or being scrutinized for atypical curiosity."

50. I note that, when describing BitChute to the UCE on November 7, 2019, LANGHORNE stated that it is "like youtube" but "more wild west." LANGHORNE also described how he had "already [p]ut flames of war 2 up" and it had not been taken down by BitChute. As described above, LANGHORNE uploaded Islamic extremist content to YouTube in May 2019, shortly after which his YouTube account was suspended. Thus I assess that, by uploading Flames of War II to BitChute, LANGHORNE was performing a test to see whether ISIS-related content would be tolerated on that platform in anticipation of receiving the final versions of the TATP videos from the UCE, and then distributing one or more of them.

51. The conversation continued on November 7, 2019, as follows:

LANGHORNE (3:20PM) – Moving forward

LANGHORNE (3:21PM) – It'll go down like this. Once I get the A-OK from my lawyer or someone else who I believe has some legal authority. I'm gonna

go ahead and upload it raw. Then after a day or two I'll upload it to youtube as well

Should gain some traction

LANGHORNE (3:22PM) – Seeing as how it's a legal video with adequate depictions, details and information without any instructions to harm others and can be used for honest practical purposes (as seen in the video via rural explosions)

LANGHORNE (3:23PM) – All we need to do from there is one of two things.

LANGHORNE (3:24PM) – 1: give it to someone with a decent audience to review or look over. A demolition channel or something of the sort. 2: wait for the information to reach those in need, i.e. Hong Kong protesters, Baghdad protesters or Venezuela for example.

Once the information is public, open and utilized by a few people of the general public the job is done.

LANGHORNE (3:25PM) – Sorta like how napalm is a well known thing to create, problem is it doesn't have much practical use, THIS however does. So, once everyone knows how to make and utilize explosives safely, then we can move on to social engineering

LANGHORNE (3:27PM) – Those videos will be a bit more....difficult to create, as they'll require me to do a good 90% of the research, scripting, fact checking, and siteing sources, once that's all done I have to edit the work into something cohesive have you and or others look over the script and then give it to you to edit. From there I'll publish it on my own platform.

LANGHORNE (3:29PM) – If you're familiar with the, light and knowledge series, think that. That's pretty much what we'll have to do but on a more general sense, then we gradually make the appeal and information more lenient on Islamic society and the need to respond to the war on islam. From that point

Well, after that part is complete, then its straight up after that.

UCE (3:44PM) – I have other projects I need to start working on for other brothers, so follow your plans as to how you will publish these videos.

LANGHORNE (4:11PM) – Will do

*Jrk*

52. On November 11, 2019, FBI Jacksonville Division Intelligence Analyst [redacted] was monitoring LANGHORNE's channel on BitChute, for which LANGHORNE uses the username Yorhajihadi. On that date, IA [redacted], who was located at the FBI Jacksonville Division office, observed that LANGHORNE had uploaded a video to BitChute that he titled "TATP OR: HOW YOU LEARNED TO STOP WORRYING AND LOVE THE BOMB". The video was time stamped 11:30 UTC on November 11, 2019, which converts to 6:30 a.m. east coast time. Upon viewing the video on BitChute, IA [redacted] observed that LANGHORNE had uploaded a version of the video that the UCE had sent to LANGHORNE on November 7, 2019, which contained a nasheed as background music.

LANGHORNE provided the following summary of the video:

This is an educational video on how to safely manufacture TATP a commonly used explosive. To my knowledge this video is ATF and US law compliant and thus perfectly legal to possess, view, download and upload. If you have recreational things to destroy such as tree stumps, junk yard cars or perhaps an old moldy barn of some sort. This video will give you instructions and the yield for each of them. Prioritizing your safety and security as not to be bothered by law enforcement for simple science experiments. If requested by state or federal officials to take this video down, I don't have an issue complying, however I do believe that since the nature of this video is strictly scientific that it's fine to upload and view. There isn't anyone specifically targeted or specified within the video to be harmed & thus doesn't confer that the explosive material produced within the video should ever be used to harm others. It's simply to be utilized for recreational and landscaping purposes, assuming you are state and local compliant with safety and other factors.

It is with extreme pleasure that I submit this video to you, the people, as it is our American right to be able to enjoy our freedoms, so long as no one is harmed in doing so.

*gmr*

Enjoy, take notes & Remember, don't worry about anything, just love the work you do and the bombs you make.

Oh and don't worry the video is legit, just remember to be cautious and everything will be fine, using small amounts means you won't have to worry much about accidental explosions. When it comes to barn or car yields however... well you're at your own risk there, might be easier to utilize other means to destroy the object.

LANGHORNE also made the following comment on the video on November 11, 2019, using his Yorhajihadi account on BitChute:

Oh yeah, you can mute it if you aren't into nasheed's the nasheed in the video is:

Mahum bi ummati ahmadin.

English lyrics can be found on youtube and online, basically it's about how Islamic leadership is failing and questionable at best in comparison to past leadership.

Other than that, please enjoy the video.

Stay safe.

53. On November 11, 2019, at 6:58 a.m. east coast time, LANGHORNE, using Twitter handle @Yorha17E, posted a tweet reading "Its alarming to hear sirens in the distance now."

54. Later on November 11, 2019, IA observed that the "TATP OR: HOW YOU LEARNED TO STOP WORRYING AND LOVE THE BOMB" video had been deleted from BitChute at some time between 10 a.m. and noon east coast time that day.

55. Later on November 11, 2019, IA observed that LANGHORNE had uploaded a video to his BitChute account, Yorhajihadi. The

video was time stamped 16:55 UTC on November 11, 2019, which converts to 11:55 a.m. east coast time. This time, LANGHORNE titled the video "HOW TO MAKE BOMBS/EXPLOSIVE MATERIAL: TATP EDITION" and provided a significantly shortened summary, which read:

This video is for scientific research and application purposes, it explains and details how to make TATP which is a commonly used volatile explosive material. Of course legally speaking you should have a explosive manufacturing license to produce such material. Please utilize extreme caution and safety during manufacturing this material. Also helps to check with local ordinances as the information here is perfectly legal to view, upload, download and posses, however the material in and of itself may not be unless you have the appropriate licenses and permissions to do so.

Please enjoy the video and leave feedback if you like, as well as what else you might wish to know.

IA attempted to view and download the video, but was unable to.

However, IA noted that the length of the video was the same as the length of the video LANGHORNE had uploaded earlier the same day. Thus I assess that second video LANGHORNE uploaded was one of the videos sent to LANGHORNE by the UCE on November 7, 2019.

### CONCLUSION

In summary, LANGHORNE is an ISIS supporter who believes that existing videos available online are inadequate to arm fellow ISIS adherents and others with knowledge on how to manufacture explosives. As a result, LANGHORNE created and disseminated a video which instructs the viewer on how to make TATP.

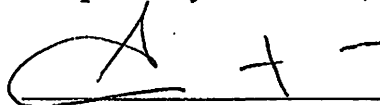
Although the video includes disclaimers about educational purposes,



LANGHORNE'S true purpose is to arm ISIS adherents and others with knowledge of how to make TATP by disseminating a video that he believes will not be taken down for terms of service violations.


Based on the foregoing facts, I submit that there is probable cause to believe that from at least February 14, 2019, continuing through at least November 11, 2019, LANGHORNE, knowing that ISIS is a designated foreign terrorist organization, attempted to provide material support to ISIS through the creation and distribution of an instructional video intended to teach followers of ISIS how to obtain materials for explosives without arousing suspicion and combine those materials to make an explosive sufficient to destroy specific types of targets, in violation of 18 U.S.C. § 2339B.

Respectfully submitted,



Armando A. Martinez  
Border Patrol Agent (Intelligence)  
FBI Task Force Officer assigned to Joint  
Terrorism Task Force

Subscribed and sworn to before me on November 13, 2019



JAMES R. KLINDT  
UNITED STATES MAGISTRATE JUDGE