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UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

United States of America)
v.)
JALIL IBN AMEER AZIZ)

Case No.

1:15-MJ-81

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of July 2014 to the present in the county of Dauphin in the Middle District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC §§ 2339B	Conspiring, and attempting to provide, material support or resources to a designated foreign terrorist organization.

This criminal complaint is based on these facts:

I, Jeffrey D. Gruppo, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Continued on the attached sheet.

Jeffrey D. Gruppo
Complainant's signature

Jeffrey D. Gruppo, SA, Task Force Officer, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 12-17-15

Martin C. Carlson
Judge's signature

City and state: Harrisburg, Pennsylvania

Martin C. Carlson, Chief Magistrate Judge
Printed name and title

AFFIDAVIT (CONTINUED)

I further state that I am a Special Agent with the Pentagon Force Protection Agency (PFPA) assigned to the Federal Bureau of Investigation Joint Terrorism Task Force (JTTF), and that this complaint is based on the following facts:

1. I am a Special Agent ("SA") with the Pentagon Force Protection Agency ("PFPA") assigned to the Federal Bureau of Investigation ("FBI") Joint Terrorism Task Force ("JTTF") as Task Force Officer (TFO). I have been a SA with PFPA since October of 2010. Prior to obtaining my position as a SA with PFPA, I was employed as a PFPA Police Officer since December of 2006. I have been assigned to the FBI JTTF since October 2014.
2. As both a SA with PFPA and as a TFO with the FBI JTTF, I have worked on investigations relating to international terrorism and violent extremists. My experience as a Special Agent has included the investigation of cases involving the use of computers and the Internet to commit terrorism related offenses. I have received training and have gained experience in interview and interrogation techniques, arrest procedures, obtaining electronically stored information through criminal process, search warrant applications, and the execution of searches and seizures. I have also received training and information, and gained experience concerning terrorism crimes, as well as the tactics, techniques, and procedures used by terrorism suspects to evade detection. I have personally participated in the

execution of search warrants involving the search and seizure of computers and electronically stored information.

3. As a federal agent, I am authorized to investigate violations of laws of the United States and execute warrants issued under the authority of the United States.

4. I make this affidavit in support of a criminal complaint charging defendant JALIL IBN AMEER AZIZ ("AZIZ") with conspiring and attempting to provide material support and resources to a foreign terrorist organization in violation of Title 18, United States Code, Section 2339B.

5. The information contained in this affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers, information provided by witnesses, a review of open source material, and the review of documents and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the Criminal Complaint, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the pertinent offenses.

6. In this affidavit, the FBI has provided translations of certain Arabic words or phrases. I made these translations based on information provided to me

from an FBI linguist, and from my training and experience. I have indicated the translations using brackets.

PROBABLE CAUSE

Introduction

7. AZIZ is a 19-year old citizen of the United States. He currently resides at 1733 Fulton Street, Harrisburg, Pennsylvania 17102, within the Middle District of Pennsylvania.

8. An investigation by the JTTF has revealed that AZIZ espouses violent jihadist beliefs and is a fervent supporter of a foreign terrorist organization known as the Islamic State of Iraq and the Levant (“ISIL”). AZIZ uses social media to spread ISIL propaganda and to seek support for the terrorist group from individuals over the internet. AZIZ's social media activity supports ISIL by radicalizing and recruiting others. AZIZ has conspired with others and attempted to facilitate the travel of other ISIL supporters to Syria so that they can become ISIL fighters. Furthermore, your affiant believes that AZIZ may be preparing to conduct or assist others in conducting an attack in the United States based on the discovery of a backpack containing numerous high-capacity weapons magazines, ammunition, a knife, and other survival items during a November 27, 2015 physical search of AZIZ's residence. See ¶ 40 *supra*.