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UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

SHEIKHDOON ABDULLAHI MOHAMUD

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Case No. 26-mj-760 (ECW)

CRIMINAL COMPLAINT

I, Keegan Rupenthal, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1: On or about October 6, 2026, in Hennepin County, in the State and District of Minnesota, and elsewhere, the defendant, SHEIKHDOON ABDULLAHI MOHAMUD, knowingly received a firearm and ammunition, to wit: a Norinco AK-47 assault rifle, model Mac-90 Sporter, with serial number 94145360, and approximately 200 live rounds of 7.62x39-caliber ammunition, knowing or having reasonable cause to believe that such firearm and ammunition will be used to commit a felony and a Federal crime of terrorism, including Providing, Attempting to Provide, and Conspiring to Provide Material Support or Resources to a Designated Foreign Terrorist Organization, in contravention to Title 18, United States Code, Section 2339B, all in violation of Title 18, United States Code, Section 924(h).

I further state that I am a sworn and licensed federal Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT OF SA KEEGAN RUPENTHAL IN SUPPORT OF CRIMINAL COMPLAINT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



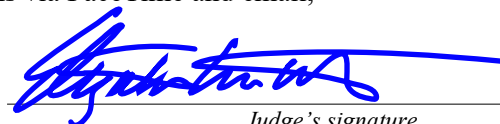
Complainant's signature

Keegan Rupenthal, Special Agent, FBI

Printed name and title

SUBSCRIBED and SWORN before me, by reliable electronic means via FaceTime and email, pursuant to Fed. R. Crim. P. 41(d)(3),

Date: October 7, 2026



Judge's signature

City and state: Saint Paul, Minnesota

Elizabeth Cowan Wright, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
26-mj-760 (ECW)

UNITED STATES OF AMERICA

v.

SHEIKHDOON ABDULLAHI MOHAMUD

Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Keegan Rupenthal, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and a member of the Minneapolis Joint Terrorism Task Force in Minneapolis, Minnesota. I have been employed by the FBI since September 2021 and am currently assigned to the Minneapolis Division. Between 2017 and 2021, I served as a Special Agent with the United States Secret Service conducting complex investigations involving a variety of criminal violations such as wire fraud, bank fraud, and crimes committed using the internet, cellular telephones, and social media platforms. I am currently specifically assigned to an FBI Counterterrorism Squad with a focus on International Terrorism. I have participated in and/or co-led prior counterterrorism investigations with the FBI, including investigations of persons providing material support to State Department-designated foreign terrorist organizations (“FTOs”).

2. Since about December 2024, the FBI has been conducting a criminal investigation of Sheikhdooon Abdullahi MOHAMUD (“MOHAMUD”). Over approximately 21 months, MOHAMUD and a confidential human source have

exchanged hundreds of bi-directional messages through multiple social media and encrypted messaging applications wherein MOHAMUD expressed his desired to travel to Somalia to join an FTO and fight on its behalf and/or to commit a mass-casualty attack on behalf of an FTO in Minnesota by acquiring and using a firearm and ammunition.

3. Based on my training, experience, and knowledge of the investigation, the totality of the facts set forth in this Affidavit, and the reasonable inferences therefrom, there is probable cause to believe that, on or about October 6, 2026, MOHAMUD did knowingly receive a firearm and ammunition, to wit: a Norinco AK-47 assault rifle, model Mac-90 Sporter, with serial number 94145360 (“the AK-47 rifle”), and approximately 200 live rounds of 7.62x39-caliber ammunition, knowing or having reasonable cause to believe that the firearm and ammunition would be used to commit a felony and a Federal crime of terrorism, including Providing, Attempting to Provide, and Conspiring to Provide Material Support or Resources to a Designated Foreign Terrorist Organization, contrary to 18 U.S.C. § 2339B, a felony and a Federal crime of terrorism, all in violation of 18 U.S.C. § 924(h) (the “Subject Offense”).

4. The facts in this Affidavit come from my personal observations, my training and experience, my participation in the ongoing investigation, and information obtained from other agents familiar with the ongoing investigation and witnesses. This Affidavit, however, is intended to show merely that there is sufficient probable cause for the requested Complaint, and it does not set forth all of my or the government’s knowledge about the matter or the ongoing investigation.

STATUTORY AUTHORITY

5. Title 18, United States Code, Section 924(h) prohibits “knowingly receiv[ing] or transfer[ing] a firearm or ammunition, or attempt[ing] or conspir[ing] to do so, knowing or having reasonable cause to believe that such firearm or ammunition will be used to commit a felony [or]] a Federal crime of terrorism” The term “Federal crime of terrorism” is defined as “an offense that—(A) is calculated to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct; and (B) is a violation of (i) 2339B (relating to providing material support to terrorist organizations)” *Id.* § 2332b(g)(5).

6. Title 18, United States Code, Section 2339B prohibits, in pertinent part, a person from knowingly providing “material support or resources to a foreign terrorist organization,” or attempting or conspiring to do the same.

7. “The term ‘material support or resources’ means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” 18 U.S.C. § 2339A(b)(1).

8. For purposes of Section 2339B, a “terrorist organization” means “an organization designated as a terrorist organization under Section 219 of the Immigration and Nationality Act.” *Id.* § 2339B(g)(6).

FACTS SUPPORTING PROBABLE CAUSE

Background on the Islamic State of Iraq and the Levant (ISIL) and Islamic State of Iraq and al-Sham (ISIS)

9. On or about October 15, 2004, the U.S. Secretary of State (“Secretary”) designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act (the “INA”) and as a Specially Designated Global Terrorist (“SDGT”) under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary 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. On September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

10. ISIS has increasingly sought to generate revenue in East Africa. ISIS’s affiliate in Somalia (“ISIS-Somalia”), which continues to conduct terrorist attacks against civilians, generates much of its funding by extorting local communities for

funding and recruits. The group punishes, intimidates, and assassinates Somali businessmen and civilians who do not support it financially or provide supplies. ISIS-Somalia aims to extend ISIS's self-proclaimed caliphate in Africa. ISIS-Somalia primarily operates in the mountains of the Bari region of Puntland, a semiautonomous Federal Member State of Somalia.

MOHAMUD's Initial Communications with CHS1

11. Since December 2024, the FBI has been conducting an ongoing national security criminal investigation of MOHAMUD regarding possible violations of the Subject Offense.

12. In or about December 2024, a Confidential Human Source (CHS1)¹ began exchanging messages through multiple social media applications with MOHAMUD. Specifically, CHS1 and MOHAMUD exchanged messages directly through encrypted messaging applications Telegram and Signal, and social media applications Discord and TikTok. On Telegram, MOHAMUD used the “@misterdoon” (UID 7185699987) account to exchange messages with CHS1; on Signal, MOHAMED used the account “Mister Miser” to exchange messages with CHS1; on Discord, MOHAMUD used the “mistermister0026_96795” (UID 1427824686711967846) (“Discord Account 1”), “misterman240_95820” (UID 518549700545089661) (“Discord Account 2”), and “baaqiyah_31485” (UID 1544941350821298259) (“Discord Account

¹ CHS1 is a confidential reliable informant, whose identity is known to Your Affiant, and has an established history of reporting truthful and reliable counterterrorism matters to the FBI. The CHS is motivated by patriotism and monetary compensation and has had a relationship with the FBI since 2017. The CHS's information during the present ongoing investigation was determined to be credible as corroborated through recordings, screenshots, and other information obtained independently from the investigation.

3”) accounts to exchange messages with CHS1; and on TikTok, MOHAMUD used the “misterman240” (UID 7667319408117193485) (“TikTok Account 1”), and “tkd.tkd.tkd06” (UID 7681138558589764621) (“TikTok Account 2”) accounts to exchange messages with CHS1, all over several months, including as recently as October 2026.

13. Through their direct messaging on Telegram, MOHAMUD indicated his intent to travel overseas to fight on behalf of al-Shabaab, a designated FTO.² MOHAMUD indicated at times he utilized his phone, his Xbox controller, his brother’s computer, and his little brother’s iPad, to type messages to CHS1. MOHAMUD also stated many times if he was unable to travel overseas because of a lack of funds, he planned to carry out a mass-casualty event in Minnesota in support of an FTO.

14. In January 2025, CHS1 and MOHAMUD communicated through Telegram. CHS1 asked MOHAMUD if he saw the news referencing the then-recent attack in New Orleans on New Year’s Eve.³ MOHAMUD indicated his support for the

² On February 26, 2008, the United States Secretary of State designated al-Shabaab as an FTO under Section 219 of the INA and as an SDGT under section 1(b) of Executive Order 13224. The Secretary has also listed the following aliases for al-Shabaab: al-Shabab, Shabaab, the Youth, Mujahidin Al-Shabaab Movement, Mujahideen Youth Movement, Mujahidin Youth Movement, MYM, Harakat Shabab al-Mujahidin, Hizbul Shabaab, Hisb’ul Shabaab, al-Shabaab al-Islamiya, Youth Wing, al-Shabaab al-Islaam, al-Shabaab al-Jihaad, and the Unity of Islamic Youth. To date, al-Shabaab remains a designated FTO.

³ On January 1, 2025, an attack occurred when Shamsud-Din-Jabbar, a 42-year-old United States citizen, rammed a truck into a crowd on Bourbon Street in New Orleans and engaged in a shootout with police. Fourteen American citizens were killed and many more were injured. The investigation revealed an ISIS flag displayed from the vehicle and the attacker posted a video declaring his allegiance to ISIS in the hours before the attack.

attacker, calling him a “real muslim,” and stated, “May Allah grant him jannah.”⁴ In other conversations, when CHS1 asked how school was going, MOHAMUD responded, “Its terrible man but i gotta keep doing it and if i fail its straight to just killin kuffar.”⁵ And im already failing so if i don’t pass in a yr ill probably save up for a gun.” A portion of these text exchanges is depicted below.



15. Also in January 2025, T-Mobile Inc. responded to legal process and provided subscriber information for phone number 614-xxx-3082, which the investigation determined was associated with MOHAMUD. Your Affiant learned the listed subscriber for phone number 614-xxx-3082 was “A.O.” (YOB 1978).⁶

⁴ Based on my training and experience, and information known to me through this investigation, I understand the term “Jannah” to literally translate to “garden,” but is also represented as “paradise” in Islam.

⁵ Based on my training and experience, I know that “kuffar” is a derogatory term used to refer to a non-Muslim.

⁶ The full name of A.O. is known to Your Affiant, but is anonymized here for privacy reasons.

Additionally, T-Mobile Inc. provided phone number 206-xxx-8976, as a secondary phone line registered to A.O.'s account.

16. Law enforcement records queried for "A.O." revealed she is the mother of "Sheikhdoon Abdullahi Mohamud" and resides with MOHAMUD at a known Minnesota residence.

17. In March 2025, MOHAMUD messaged CHS1 through Telegram and stated, "I wanna get martyred inshallah but if i get sent to jail and kill my neighbour with fire or knife then ill be sent to jail the police wont kill me ill get raped there man [crying emoji] if im gonna do it in america i better die in any way other than that . Thats why i wanna save up to go to another country or.. get a gun here and just start killing a bunch of white ppl (because a lot of white ppl are kuffar) but how do i know if theyre muslim or not . Ill just shoot a club or smthn but thsts not how i wanna go i wanna fight in Somalia support the isis in puntland.⁷ Thas my honest answer tbh."

18. In May 2025, Agents from FBI Minneapolis attempted to interview MOHAMUD at his residence. Agents spoke with A.O. at the residence. A.O. stated MOHAMUD was not at home but would be returning from school shortly by bus. During the attempted interview, A.O. phoned MOHAMUD's father, A.M.W., who spoke with agents and stated he did not want to share any information pertaining to himself or his son with Agents and would provide Agents' contact information to his attorney.

⁷ In 2015 al-Shabaab leader Abdul Qadir Mumin pledged allegiance to the "Islamic State" and established their operations in Puntland, a semi-autonomous region of Somalia. Al-Shabaab utilized the region as a base of the operations launching numerous attacks from the region.

**MOHAMUD Expresses Support for FTOs
and a Desire to Make Hijrah via Discord Account 1**

19. In December 2025, MOHAMUD messaged CHS1 through Telegram stating, “When i make hijrah insha Allah i will go to ISIS in somal no matter how tempting going to Al Shabaab is.”⁸

20. In December 2025, MOHAMUD messaged CHS1 through Telegram asking to be added to additional servers and chat groups on Discord. MOHAMUD provided CHS1 his Discord username for Discord Account 1 and sent a screenshot of his profile to CHS1 through Telegram direct messages. The screenshot provided by MOHAMUD of the account was to ensure CHS1 had the correct account. The screenshot provided the Discord display name, “mistermister,” and username, “mistermister0026_96795” (i.e., Discord Account 1).⁸

21. In December 2025, CHS1 and MOHAMUD continued to direct message through Discord Account 1. MOHAMUD told CHS1 that his Telegram account was banned, saying, “I was in al shabab channels to watch the videos and news. That probably got me banned.”

22. In January 2026, CHS1 and MOHAMUD continued to exchange direct messages through Discord, with MOHAMUD using Discord Account 1. MOHAMUD continued espousing his support for designated FTOs by sending CHS1 al-Shabaab

⁸ I know, based on my training and experience, that “Hijra” or “Hijrah,” is an Arabic word meaning “migration,” but is commonly used by ISIS to refer to migration to ISIS-controlled territory for the purpose of joining or supporting ISIS to engage in violent jihad. “Jihad” is an Arabic word that literally means striving or struggling, but in the context of ISIS supporters, commonly refers to a holy war, fight, or struggle against the enemies of Islam.

propaganda videos from Al-Kataib⁹ media depicting fighting in what appeared to be a Middle Eastern or African country where several parts of the video showed people shooting weapons, explosions occurring, and people posing with the flag associated with designated FTO, al-Shabaab. MOHAMUD sent two videos to CHS1 on this occasion, and a still image from one of the videos is depicted below, showing what appears to be a mortar or rocket-propelled grenade launcher, an FTO flag, and several apparent fighters with automatic weapons:



23. Later in January 2026, CHS1 sent MOHAMUD a photograph of CHS1 holding an ISIS flag (as depicted below) as well as a short selfie-style video. CHS1 deleted the photo and video from their chat, which CHS1 later reported was to demonstrate to MOHAMUD that CHS1 was aware of operational security. MOHAMUD confirmed receipt of them by stating, “I saw the photos akhi.”¹⁰ The photograph CHS1 sent to MOHAMUD was meant to show CHS1’s affiliation with ISIS in Syria, as depicted below:

⁹ Al-Kataib is known to be the official media wing of the designated FTO al-Shabaab.

¹⁰ I know, based on my training and experience, that “akhi” means brother in Arabic.



24. In March 2026, CHS1 and MOHAMUD continued to exchange messages through Discord Account 1. In their conversation, MOHAMUD stated, “akhi when i save up like 2000 to 3000 i will make hijrah.” Later in the conversation, MOHAMUD stated:

so far yeah but yesterday i wanted to buy a cheap BB gun so i can train my aiming here a little and my syster said “whyre you going to Africa and your getting a fake gun now that is suspicious” and i said to my sister “i quit school and if i live here in america ill be homeless in a few years since houses and apartments are very expensive” which is true, a house here is 200k what am i a millionaire [crying emoji]. so right now i think i will be safe even if i travel i havent told anyone the real reason why im traveling.

**MOHAMUD Expresses a Desire to Make Hijrah and
to Conduct an Attack in the United States**

25. In April 2026, through Discord Account 1, MOHAMUD provided CHS1 MOHAMUD’s TikTok account information as display name, “misterman24” and username “@misterman240” (“TikTok Account 1”). Through TikTok Account 1, MOHAMUD posted or re-posted propaganda videos depicting fighters with a flag¹¹

¹¹ The flag depicted in the video is not clear enough to distinguish between ISIS or al-Shabaab, but by design, based on my training and experience, is associated with either FTO.

associated with an FTO and a nasheed¹² playing over the video. The video which is in black and white featured several fighters walking in a mountainous area carrying weapons and the video filmed one of the fighters from behind carrying the FTO flag waving in the wind with the nasheed playing. A still-shot from the video is depicted below:



26. In May 2026, MOHAMUD messaged with CHS1 through TikTok Account 1 stating, “Akhi wallahi im so excited to make hijrah i want to go there and get married there and fight the enemies of Allah.” MOHAMUD discussed when he finds employment he intended to work for approximately six weeks in order to save \$2000 in order to be able to purchase a plane ticket. MOHAMUD continued stating, “When they stop me for the airport i will say im there for vacation im there to see my parents country. Then when i go to somalia ill never take the flight back.”

27. In July 2026, MOHAMUD messaged CHS1 through TikTok Account 1 stating he did not have enough money to travel to Somalia. He messaged CHS1 to indicate a change in plans: “so i will do attack here.” MOHAMUD continued, “if i don’t

¹² Based on my training and experience, a “nasheed” is a work of vocal music that is most often sung a cappella, and which carries with it an Islamic belief or practice.

leave by next month akhi i will prepare here in america and and if i do an attack here im not doing it for any worldly matter im doing for the sake of Allah only.” MOHAMUD continued, “i might buy two pist. ols¹³ online and go to malll [sic] of america or valley fair on Minnesota on christmas time.” Portions of these exchanges are depicted below.



28. In July 2026, MOHAMUD messaged CHS1 through TikTok Account 1 and Signal Account “Misterman.73.” MOHAMUD further discussed his intent to

¹³ Based on my training and experience I know that users of social media will often intentionally misspell or break-up words that may commonly be flagged by content moderators or monitoring software in an attempt to avoid detection and/or reporting to authorities by social media platforms.

attack the Mall of America, “because its owned by jewish [sic] so if i kill even 30 people noone would go there anymore. I want to harm the jew just like the brothers in australia bondi beach harmed the jews. Ill just go grab assault rifle bomb is too complicated kill maybe 30-60 people insha Allah and have 260 ammo.” CHS1 stated there was a “brother” in Wisconsin who sells guns. MOHAMED replied, “Wow i will buy for sure jazakallahu khayran.”¹⁴ MOHAMUD further explained he would drive straight to the crowded place and start shooting.

29. In August 2026, MOHAMUD messaged CHS1 through Signal Account “Misterman.73.” MOHAMUD stated he would be in Ohio for most of August, would return to Minnesota in September, and planned to have 700-800 dollars then and could purchase the firearm for cash. When discussing the firearm purchase, MOHAMUD stated he would meet the “brother” to buy an AK¹⁵ at the Mall of America on September 10, 2026. MOHAMUD described himself as “5’11 dark somali guy” and “I will be wearing green jacket.” MOHAMUD sent two photographs of himself, included below.¹⁶

¹⁴ Based on my training and experience your Affiant knows the phrase “jazakallahu khayran” to mean “may Allah bring blessings upon you.”

¹⁵ Based on my training and experience I know that “AK” likely refers to an AK-47 or similar style assault rifle often used in attacks by ISIS and al-Shabaab.

¹⁶ The photographs depict MOHAMUD inside what appears to be a residence and sitting on a bed. MOHAMUD appears to be dressed in tan pants, a blue polo shirt with “Parking Patroller” logo, a blue hat, and a black balaclava.



30. In August 2026, MOHAMUD messaged with CHS1 through TikTok Account 1 and provided CHS1 account information for Discord Account 2, stating he lost access to his old Discord account, Discord Account 1.

31. In August 2026, MOHAMUD continued to use Discord Account 2 to spread FTO propaganda and to contact others supportive of designated FTOs. MOHAMUD sent a message to CHS1 through Discord Account 2 for CHS1 to join a server called, “The Revival.” MOHAMUD told CHS1 it was a “small group like 4 ppl from america that support dawah¹⁷ i barely talk to them i just friend and saw salaam.” MOHAMUD then messaged CHS1 through TikTok Account 1, “I was going

¹⁷ Based on my training and experience, and information known to me through this investigation, I understand the term “Dawlah” and “Dawla” to mean ISIS.

to ask after i pay for AK and train for a month i was going to ask if one person from group can come to shoot or bmb at mall of america since all of us in America but i dont know what state there in and if they cannot attend i will do sh###ting by myself.”¹⁸

32. In September 2026, after approximately two weeks of no contact, CHS1 was contacted by TikTok Account 2, “tkd.tkd.tkd06.” The user stated, “akhi it’s me misterman24,” which was later confirmed to be MOHAMUD. MOHAMUD then stated unprompted, “Also tell the brother with the [squirt gun emoji] to come at the 24th not the 10th.” MOHAMUD also requested CHS1 contact him through encrypted messaging application, SimpleX and provided a link to his account. Through TikTok, he continued explaining he was not doing this for anyone and was not being pressured by anyone, noting that he was “very proud to even have an opportunity like this” and “to have [squirt gun emoji].”. He also stated, “Akhi if I was to be stuck in Ohio I would learn to drive and rent a 4x4 truck and drive through crowd.” Portions of the exchange are below:

¹⁸ Your Affiant believes this is another example of MOHAMUD attempting to avoid detection and flagging by social media providers and/or law enforcement by masking the words “bomb” and “shooting.”



33. In September 2026, MOHAMUD exchanged direct messages with CHS1 through SimpleX. MOHAMUD then sent CHS1 a new Discord account username “baaqiyah_31485” (“Discord Account 3”), which he planned to use when he returned to Minneapolis.¹⁹ In the same conversation, before the CHS could reply, MOHAMUD stated, “I can’t wait until I kill kuffar man. October 24 is the day insha Allah.” MOHAMUD then began to communicate with CHS1 through Discord utilizing Discord Account 3 and stated he was using his brother’s computer to communicate since he did not have a phone.

¹⁹ I know, based on my training and experience, that the term “baaqiyah” is a phrase sometimes used by ISIS supporters essentially meaning the caliphate remains.

34. According to DHS information, MOHAMUD has a brother, J.A.M. (YOB 2007). According to Minnesota Driver and Vehicle Services, the Subject Premises is the registered address of J.A.M.

35. In September 2026, through Discord CHS1 inquired with MOHAMUD if he had money. MOHAMUD replied, "yeah but how much. i only have. 100 bucks for ammo." He further stated he had \$600.00 total. In the same conversation, CHS1 stated, "brother, now its 5 am here and today it mark one year since i joined ISIS officially and start my jihad journey." MOHAMUD replied, "Allahu akbar. i am happy. may Allah bring you victory. and martyrdom." CHS1 continued the conversation by asking, "The brother asked me to ask you are you sure and 100% you want to do this? He wants to make sure that you are committed and truly deep down want to do this, this is serious. Also as I told you brother before, if you want to back out, we will remain brothers and 8 [sic] love you for the sake of Allah whether you do or don't." MOHAMUD replied, "wallahi i want to do this, i am very serious i don't care about anything in this world, i am 100% committed [sic] to the cause of dying for the sake of Allah only."

36. In September 2026, though Discord, CHS1 asked about the attack, "Oh so the attack on 24 October. , yes I remember you said it's the day. Why this day? Big gathering?" MOHAMUD replied, "yeah it's a bunch of asians [sic] Chinese Vietnamese and other kuffar celebrating. it will be a lot of people." He then sent a link to a "Hmong Arts Celebration" at the Mall of America.

37. In September 2026 through Discord Account 3, MOHAMUD continued to send propaganda videos to CHS1 and stated, “yesterday i was watching omar matteen²⁰ attack video and i think i can do the same thing omar matteen did. i just walk in and shoot.” A still shot from one of the propaganda videos sent by MOHAMUD is depicted below:



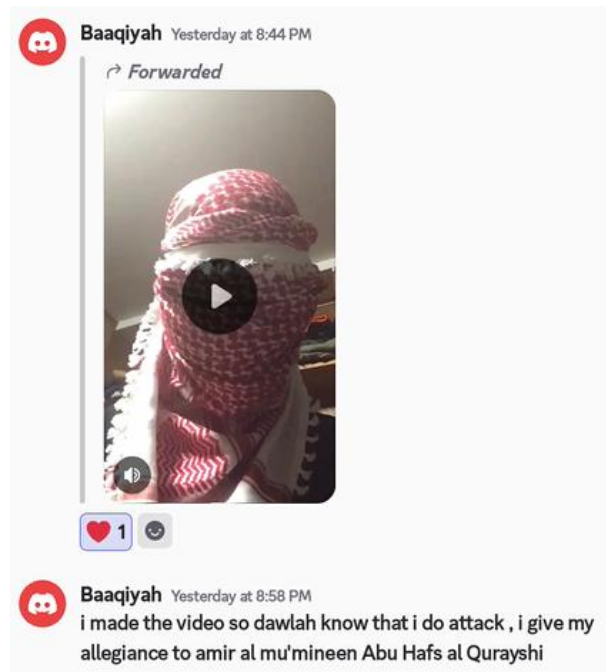
MOHAMUD Pledges his Allegiance to ISIS

38. In September 2026 through Discord, MOHAMUD sent the CHS a selfie-style video of himself pledging allegiance ISIS (i.e., a *bay'ah*). MOHAMUD indicated a day prior he would utilize his “little brothers” iPad to make a video. MOHAMUD pledged allegiance to “Abu Hafs al-Hashimi al-Qurashi.”²¹ MOHAMUD wrote below the video, “i made the video so dawlah know that i do attack , i give my allegiance to

²⁰ On June 12, 2016, Omar Mateen conducted a mass-casualty shooting at the Pulse night club in Orlando, Florida. In a 911-call shortly after the shooting began, Mateen swore his allegiance (i.e., a *bay'ah*) to ISIS.

²¹ Your Affiant knows, based on training and experience, that in 2023 Abu Hafs al-Hashimi al-Qurashi was named as the fifth and current caliph of the Islamic State (ISIS). In Arabic, a caliph is the chief religious leader and civil ruler of an Islamic community.

amir al mu'mineen Abu Hafs al Qurayshi.” As noted above, the term “dawlah” commonly means ISIS. A still from MOHAMUD’s video is depicted below.²²



MOHAMUD Continues to Discuss His Attack Planning

39. On about September 25, 2026, through Discord Account 3, CHS1 sent MOHAMUD a message that stated the “brother” could sell the AK rifle, four magazines, and ammunition to MOHAMUD on October 6, 2026. After learning the date, MOHAMUD replied, “October 6? that is close [sunglasses emoji].”

40. Over the next several days, MOHAMUD continued to discuss with CHS1 MOHAMUD’s desire to purchase a firearm in furtherance of his attack plan. For example, on September 27, when asking CHS1 about the firearm, MOHAMUD said, “i want full auto [crying laughing emoji].” On September 28, after CHS1

²² In the video, MOHAMUD appears to be located inside a residence, wearing a red and white scarf, typically referred to as a keffiyah, over his face and head.

described the magazine capacity, MOHAMUD stated, “man 60 wouldve been great, but 30 round magazine is good too, omer matteen used 30 round im not complaining [crying laughing emoji].”²³ On September 29, MOHAMUD told CHS1 “i am mentally and physically ready.” When CHS1 asked if MOHAMUD really wanted to go through with the attack, MOHAMUD said “yes i am 100% sure akhi I would have backed out by now if i wasnt sure.” On October 4, while MOHAMUD and CHS1 were discussing the logistics of the October 6 in-person meeting, MOHAMUD sent CHS1 a video in which MOHAMUD counted \$601 in cash to show CHS1 he had the money to purchase the firearm, magazines, and ammunition.

MOHAMUD Purchases a Firearm, Magazines, and Ammunition from an FBI Undercover Employee

41. On October 6, 2026, FBI surveillance observed MOHAMUD leave his residence and travel by himself to a pre-determined meet location near his residence. There, MOHAMUD met with an FBI Undercover Employee (“UCE”), whom MOHAMUD believed was the “brother” from ISIS introduced by CHS1, inside a vehicle driven by the UCE. During the meeting, which was audio- and video-recorded, MOHAMUD provided \$600 cash to the UCE to purchase the AK-47 rifle,²⁴ four 30-round-capacity magazines, and about 200 rounds of ammunition. The UCE counted out the \$600 cash in front of MOHAMUD. The UCE confirmed that MOHAMUD wanted to purchase an “AK,” and MOHAMUD said he did.

²³ As noted above, Omar Mateen committed the Pulse Nightclub mass shooting in Orlando, Florida, and during the shooting left a video message pledging his allegiance to ISIS.

²⁴ The AK-47 rifle MOHAMUD purchased was rendered inert prior to the transaction for officer and public safety. The ammunition rounds, however, were “live.”

42. The UCE then opened a large duffel bag that contained the AK-47 rifle and four 30-round 7.62x39-caliber magazines and showed the items to MOHAMUD. The UCE also showed MOHAMUD a container with about 200 rounds of 7.62x39-caliber live ammunition. The UCE then handed the large duffel bag containing the AK-47 rifle and four magazines to MOHAMUD along with the ammunition container. The UCE explicitly told MOHAMUD that the UCE was an active member of ISIS and asked about MOHAMUD's support for ISIS and attack plans. MOHAMUD described his own radicalization, explaining that he explored different FTOs, including al-Shabaab, al Qaeda, and ISIS, before determining that he was supporting ISIS. MOHAMUD then told the UCE that he planned to conduct a shooting at a kuffar festival at the Mall of America. MOHAMUD explained that part of his motivation was that the Mall of America was owned by Jews. He also stated that he was angry at the bad treatment of Muslims in the wake of the "San Diego attack" as one of his motivating reasons for wanting to attack the kuffar.²⁵ MOHAMUD told the UCE that he planned to wait in the immediate area prior to returning to his residence with the AK-47, magazines, and ammunition to ensure that his mother would not be home. The UCE told MOHAMUD to contact the brother in Syria whom MOHAMUD had been communicating with if he needed anything else, and the UCE wished MOHAMUD luck.

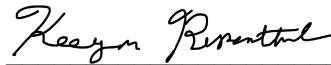
²⁵ Your Affiant believes that the San Diego attack refers to the events on May 18, 2026, when two individuals carried out a shooting attack at the Islamic Center of San Diego that killed three individuals.

43. MOHAMUD exited the UCE's vehicle in possession of the AK-47 rifle, the four magazines, and the 200 rounds of ammunition inside the large duffel bag. Shortly after exiting the vehicle, MOHAMUD was arrested at gunpoint by the FBI.

CONCLUSION

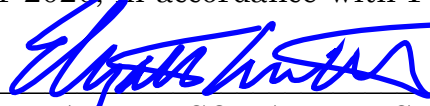
44. Based upon the totality of all the facts and circumstances set forth in this Affidavit, the reasonable inferences therefrom, my training, experience, and knowledge of the investigation, I respectfully submit that there is probable cause to believe that MOHAMUD violated Title 18, United States Code, Section 924(h) on or about October 6, 2026.

Respectfully Submitted,



Keegan Rupenthal
Special Agent, FBI

Sworn and subscribed to before me, by reliable electronic means (email and FaceTime) on this 7th day of October 2026, in accordance with Fed. R. Crim. P. 41(d)(3).



ELIZABETH COWAN WRIGHT
United States Magistrate Judge
District of Minnesota