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AO 91 (Rev. 11/11) Criminal Complaint

~~THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT~~

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

XUANYU HARRY PANG, also known as
Raven

UNDER SEAL

CASE NUMBER: 1:22-cr-528

CRIMINAL COMPLAINT

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

From in or about September 2022 to the present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, XUANYU HARRY PANG, also known as Raven, violated:

Code Section
Title 18, United States Code, Section
2339B

Offense Description
Attempt to Provide Material Support and
Resources to a Foreign Terrorist Organization

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Thomas Mata
Thomas Mata
Special Agent, Federal Bureau of
Investigation (FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the statements in the Complaint and Affidavit by telephone.

Date: October 16, 2022

Beth W. Jantz
Judge's signature

City and state: Chicago, Illinois

BETH W. JANTZ, U.S. Magistrate Judge
Printed name and Title

AFFIDAVIT

I, Thomas Mata being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since approximately June 2021. I am currently assigned to the Joint Terrorism Task Force and my responsibilities include the investigation of criminal violations relating to international terrorism. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to terrorism offenses, including, but not limited to, Title 18, United States Code, Sections 2332a and 2339B. I have also participated in numerous terrorism training courses throughout my law enforcement career. I am familiar with and have used common methods of investigation, including, but not limited to, visual and electronic surveillance such as court-authorized intercepts, debriefing and questioning of witnesses and defendants, and the use of search and arrest warrants, pen registers, and undercover agents. In addition, I have participated in the execution of a number of search warrants and arrests.

2. This affidavit is submitted in support of a criminal complaint alleging that XUANYU HARRY PANG, also known as Raven, violated Title 18, United States Code, Section 2339B by attempting to provide material support and resources, namely, property and services, to a designated foreign terrorist organization, namely, the Islamic Revolutionary Guard Corps-Quds Force (IRGC-QF) and Kata’ib Hizballah (KH).

3. According to government records, PANG is a 36-year-old naturalized U.S. citizen who was born in Changchun City, China and relocated to the United States in June 1998. On or about February 1, 2022, PANG enlisted in the U.S. Navy and is currently in training at the U.S. Navy's Great Lakes Naval Station. Based on physical surveillance and PANG's U.S. Navy enlistment documents, PANG also resides at the Great Lakes Naval Station in North Chicago, Illinois.

4. As described below, PANG attempted to provide material support and resources to designated foreign terrorist organizations, specifically an Iraqi-based Hizballah group acting on behalf of and at the direction of the Iranian Islamic Revolutionary Guard Corps Quds Force (IRGC-QF) as part of a purported plot to attack the Great Lakes Naval Station in North Chicago, Illinois. PANG was informed that the purpose of the attack was to seek revenge for the death of IRGC General Qasem Soleimani, who was killed in a strike conducted by the U.S. military in January 2020. PANG provided logistical assistance, such as taking surveillance photos and videos of the outside and inside of the base, and agreed to provide military uniforms and a phone that could be used as a detonator for an explosive device to an FBI confidential human source (CHS) in support of this planned attack.

5. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging PANG with attempting to provide material support and resources to a foreign terrorist organization, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish

probable cause to believe that the defendant committed the offense alleged in the complaint.

6. This affidavit is based on my personal knowledge, training, and experience, information provided to me by other law enforcement agents, my review of search warrant and other materials gathered during the course of the investigation, communication captured by an FBI Online Covert Employee (OCE1), audio and video evidence captured by an FBI confidential human source (CHS1) and my review of publicly available information.

SUMMARY OF THE INVESTIGATION

7. As described in more detail below, OCE1 communicated online with Individual A, an individual believed to be located in Colombia. OCE1, who was supposedly overseas, explained that he/she needed a trusted contact in the United States to help conduct an attack against the United States to avenge the death of IRGC General Soleimani. As described below, to facilitate the attack, Individual A connected OCE1 and PANG. OCE1 created a separate online persona (OCE2) posing as an Iraqi operative who was arriving in the United States to help plan the attack. PANG communicated online with OCE2 and agreed to in-person meetings to discuss the plans for the attack. PANG's in-person meetings were with CHS1,¹ who was the in-person identity of OCE2.

¹ CHS1 has been working with the FBI since approximately 2014. CHS1 has no prior arrests/convictions or negative reporting. CHS1 is working with the FBI based on patriotism as well as monetary benefits. CHS1 has done extensive work for the FBI beyond this case, and the CHS1's total compensation for work performed and the reimbursement of expenses over the past approximately 8 years is in excess of \$665,638.63.

8. During an in-person meeting in Chicago, CHS1 disclosed to PANG that CHS1 was a representative of Hizballah in Iraq, which I understand to be a reference to Kata'ib Hizballah (KH). CHS1 explained to PANG that CHS1 was planning an attack in the United States to avenge the death of IRGC General Soleimani. In online communications with PANG, OCE2 (using the same persona as CHS1) further explained that IRGC members had difficulty traveling to the United States because IRGC is a designated foreign terrorist organization (FTO). PANG agreed to help CHS1/OCE2 plan an attack and provided photographs of the Great Lakes Naval Station from outside and inside the base.

PROBABLE CAUSE

I. BACKGROUND ON FOREIGN TERRORIST ORGANIZATIONS

9. According to my training and experience, the Islamic Revolutionary Guard Corps (“IRGC”) is a branch of Iran’s armed forces that includes a counterintelligence directorate and a representative of the Supreme Leader of Iran.

10. According to my training and experience, IRGC-Quds Force (IRGC-QF) is a branch of the IRGC that conducts unconventional warfare and intelligence activities outside Iran, including assassinations and cyber-related attacks, among other things.

11. On or about April 15, 2019, the Secretary of State, in accordance with section 219 of the Immigration and Nationality Act, as amended, designated the IRGC, including the Quds Force, as an FTO. To date, the IRGC and its subordinate branch, the IRGC-QF, remain a designated FTO.

12. According to open sources, Kata'ib Hizballah (KH) is an Iraqi insurgent group that was founded by Abu Mahdi al-Muhandis in 2007. The group has received a significant amount of training, logistical support, and weapons from the IRGC.

13. As of July 2, 2009, the Secretary of State designated the KH (and other aliases) as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under Executive Order 13224. To date, the KH remains a designated FTO.

II. PANG'S INVOLVEMENT WITH A PLOT TO ATTACK THE UNITED STATES INVOLVING PURPORTED IRANIAN ACTORS

14. On or about April 18, 2022, the FBI obtained a forensic image of PANG's phone (PANG Phone 1) pursuant to a surreptitious, court-authorized search of PANG's phone.² The FBI searched the forensic image pursuant to a court-authorized search warrant and found messages between PANG, using Communications Platform 1³ (PANG Account 1), and Individual A. Some of the messages found within the forensic image of PANG Phone 1 and seized are described below. These messages

² I believe PANG is the user of PANG Phone 1 based on the following: Based upon information provided by the U.S. Navy, on or about February 1, 2022, PANG reported to the Great Lakes Naval Station, in Great Lakes, Illinois. As a new recruit, PANG was required to relinquish all personal property in his possession upon arrival, to be held under control of the U.S. Navy until the completion of boot camp. Upon his arrival to the Great Lakes Naval Station, PANG relinquished PANG Phone 1 to U.S. Navy personnel and PANG Phone 1 remained in the control of U.S. Navy Recruit Training Command until approximately April 23, 2022, when PANG completed his Navy boot camp. Law enforcement conducted its initial search of PANG Phone 1 before the U.S. Navy returned the phone to PANG on April 23, 2022. Additionally, when PANG enlisted in the United States Navy, he completed and submitted a Standard Form 86 ("SF-86") background questionnaire in which he listed the phone number for PANG Phone 1 as belonging to him.

³ The government has masked the names of the communications platforms discussed in this affidavit but can provide the true names upon request.

consist of communications between PANG and Individual A related to a plan involving Iranian actors to conduct an attack in the United States to avenge the death of IRGC General Soleimani. These communications between PANG and Individual A occurred before PANG was introduced to CHS1 and OCE2, and before Individual A had contact with OCE1.

15. According to Communications Platform 1 messages from PANG Account 1, between approximately June 9, 2021 and June 26, 2021, PANG, using PANG Account 1,⁴ exchanged numerous Communications Platform 1 messages with Individual A, who was utilizing a Communications Platform 1 account associated with a Colombian phone number.⁵ Based on my knowledge of the investigation and my training and experience, and as detailed below, during the discussions between PANG and Individual A, they discussed a variety of criminal activities, including, as discussed below, a plot to smuggle radioactive polonium into the United States to further an Iranian plan to conduct an attack in the United States to avenge the death of IRGC General Soleimani.

⁴ I believe PANG to be the user of PANG Account 1 based on the following: During the initial search of PANG Phone 1, law enforcement discovered PANG Account 1 within PANG Phone 1. According to Communications Platform 1, only one mobile device can be authorized to use an account at a given time. Also, based on the search of PANG Phone 1 the phone number for Pang Account 1 is the phone number for PANG Phone 1, which is linked to PANG as described in footnote 1.

⁵ I believe Individual A is the user of the Communications Platform 1 account associated with this Colombian phone number based upon the following: The search of the forensic image of PANG Phone 1 revealed Communications Platform 1 messages from PANG Account 1 to a Communications Platform 1 account associated with this same Colombian telephone number. Law enforcement also discovered that within the contact list of the PANG Phone 1, PANG had this phone number associated with “[name of Individual A]” (Individual A).

16. More specifically, on or about June 9, 2021, between approximately 4:11 a.m. and 7:59 p.m., PANG, utilizing PANG Account 1, exchanged approximately 28 messages with Individual A. The exchanged messages appear below:⁶

Individual A: Greetings let me know if you have any questions.

Pang: I am organizing it there are no questions yet.

Individual A: Ok

Pang: Did you ask the Iranian *[sic]* about the weapons they asked us to supply them.

Individual A: You put that their arms you want mercenaries in also requests *[sic]*.

Pang: Okay.

Individual A: Not 10 million dollars it would be more.

Pang: Perfect you will have the request tomorrow.

Individual A: I don't know if you would like gold.

Individual A: Ok.

Individual A: They tell me to let you know they investigated you and you are trustworthy.

Pang: Let me ask [if the Iranians] have gold.

Individual A: Yes they can deliver the gold in an Arab country.

⁶ Any translations or transcripts of the messages described in this Affidavit remain in draft form; to the extent quotations from the conversations are included, they are preliminary, not final. Any typographical errors in quotations are in the original. The summaries of messages in this affidavit do not include reference to all of the topics covered during the conversations. In certain instances, I will offer my interpretations of certain messages in brackets and otherwise. My understanding of these conversations is aided by the contents and context of the conversations, my familiarity with the facts and circumstances of the investigation, my experience as a law enforcement agent, my discussions with other law enforcement agents and officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation. Some of the messages were in the Spanish language, including those between PANG and Individual A. For these messages I have relied on draft English translations of the messages prepared by certified FBI linguists. Any times listed for the messages are based on the times listed in the forensic image of PANG Phone 1 and are approximate. Based on information obtained during the investigation so far, is my understanding that PANG is not fluent in Spanish. According to records produced by Apple pursuant to a 18 U.S.C. § 2703(d) order, on PANG Phone 1 were translation applications which would have allowed PANG to translate the Spanish messages into English and vice-versa.

Pang: 100 [Agreement].⁷
Pang: I have a connection in Pakistan if they want to move gold.
Pang: We can separate [the gold] and [make] that in a separate deal.
Individual A: Excellent, I am going to ask you for gold.
Individual A: Yes.
Pang: Ok.
Pang: Let me finish what I am doing we'll talk later.
Individual A: You tell me to explain that that would be the last delivery of material that it will be done on your route.

17. Based on my knowledge of the investigation and my training and experience, I believe that in these messages PANG and Individual A discussed a plan to smuggle weapons on behalf of Iranian buyers and to also smuggle and/or give payment in gold.

18. On or about June 15, 2021, between approximately 2:41 p.m. and 2:42 p.m., PANG, utilizing PANG Account 1, exchanged approximately six Communications Platform 1 messages with Individual A. The exchanged messages appear below:

Individual A: Good morning pal how are we doing with the plan.
Pang: Ready.
Pang: I am sorry I had court yesterday.
Individual A: They [the Iranian actors] told me polonium is a radioactive chemical.⁸
Pang: I will send it after taking my kids to school.

⁷ Based on my knowledge, training, and experience, as well as open sources research, I believe that the word “100” in this context was being used in a similar fashion to the “100 emoji,” which is utilized in digital communication to express or emphasize approval or support.

⁸ Based on my knowledge, training, and experience, as well as open sources research, I know polonium is a radioactive element present in the environment. Polonium is not harmful outside the body. However, if ingested, it is lethal in extremely small doses. In small amounts, it also has legitimate industrial uses, mainly in devices to eliminate static electricity.

Individual A: That they want to move it [the polonium]

19. Based on my knowledge of the investigation and my training and experience, I believe that in these messages PANG and Individual A discussed a plan to smuggle polonium into the United States on behalf of the Iranian actors.

20. On or about January 11, 2022, between approximately 1:34 a.m. and 1:40 a.m., PANG, utilizing PANG Account 1, exchanged approximately 33 Communications Platform 1 messages with Individual A. Several of the exchanged messages appear below:

Individual A: I tell you that the Iranians managed to pass the radioactive polonium...And will detonate it this year.

Pang: Ok.

Individual A: I will be letting you know, so you are not nearby.

Pang: Ok...Thank you, brother.

Individual A: Those gringos [Americans] are going to die. I really believe they can disappear a city.

Pang: Yes Sir.

Individual A: It is serious

Pang: It will be of great damage.

Individual A: But that is how business is.

Pang: Yes.

Individual A: It is for revenge for their General [IRGC General Qasem Soleimani⁹].

Pang: It is war...That is the way it is

Individual A: They will not know who it was.

Pang: Understood.

Individual A: I do not know which city it will be.

Pang: Ask them about the business deal for the gold that they wanted.

⁹ On or about January 2, 2020, the U.S. Department of Defense issued a public statement regarding the death of Soleimani. The statement read, in part, “At the direction of the President, the U.S. military has taken decisive defensive action to protect U.S. personnel abroad by killing Qasem Soleimani, the head of the Islamic Revolutionary Guard Corps-Quds Force, a U.S.-designated Foreign Terrorist Organization.”

Individual A: But it is a large capital. Distance your family from the large cities.

21. On or about January 30, 2022, between approximately 7:58 p.m. and 8:28 p.m., PANG, utilizing PANG Account 1, exchanged approximately 40 Communications Platform 1 messages with Individual A. Several of the exchanged messages appear below:

Pang: Keep in contact with Iran.
Pang: We will need them later.
Individual A: Yes, that is a fact. They [Iranians] do not want to contact anyone else. They [Iranians] are very strict in terms of security.
Individual A: They are with the "Risos" [sic] [Russians]
Individual A: And want vengeance against the gringos.
Individual A: And soon they will see part of their operation.
Pang: Perfect.
Individual A: When they detonate what they went through [sic]
Pang: Let me know with advance notice, that way I could take my family away.
Individual A: They are waiting for the moments [sic] and he was missing some detonators.
Pang: Okay.
Individual A: I think that it will be in the gringa capitol.
Individual A: He will make history that not even Bin Laden would do.
Pang: Noted, I will keep my family far from that area.
Pang: Thank you, brother.
Pang: Not a word.
Pang: Promise.
Individual A: Ok, take care.
Pang: You too my brother.

22. Based on my knowledge of the investigation and my training and experience, I believe that as reflected in the above messages, PANG and Individual A continued to discuss a potential Iranian terrorist plot. Individual A referenced

deceased terrorist Usama Bin Laden, who was the leader of Al-Qaeda and who was responsible for the September 11, 2001 attacks on the United States.

III. PANG ATTEMPTS TO PROVIDE MATERIAL SUPPORT AND RESOURCES TO CHS1, A PURPORTED REPRESENTATIVE OF KH AND IRGC

23. On or about July 13, 2022, an FBI online covert employee (OCE1) created an online persona for the purpose of reaching out to Individual A via social media to gather additional information about PANG. FBI identified Individual A's Communications Platform 2 account through open source searches.¹⁰ On Communications Platform 2, Individual A used the moniker, "Jose Perez." OCE1's public Communications Platform 2 profile indicated that OCE1 was an Iraqi Shia militant group commander. OCE1, purportedly located overseas, befriended Individual A through Communications Platform 2 and reached out to Individual A via the direct messages function of Communications Platform 2 ("Communications Platform 2 Messenger").

24. Between July 25, 2022 and August 20, 2022, OCE1 and Individual A had brief communications through Communications Platform 2 Messenger. OCE1 expressed an interest in forming an alliance with Individual A and his/her group regarding the "great Satan" (referring to the United States). The conversation then

¹⁰ I further believe that this Communications Platform 2 account is used by Individual A based upon at least the following: During this investigation, the FBI reviewed communications over PANG Account 1 between PANG and Individual A during which Individual A told PANG that Individual A had sent a Communications Platform 2 "friend request" to PANG from this same Communications Platform 2 account.

moved to Communications Platform 1. I know that Communications Platform 1 messages are end-to-end encrypted.

25. On or about August 20, 2022, the conversation between OCE1 and Individual A moved from Communications Platform 2 Messenger to Communications Platform 1.¹¹ The conversation between OCE1 and Individual A was in Spanish. Individual A utilized a Communications Platform 1 account associated with a Colombian telephone number. OCE1 does not speak Spanish and communicated in real-time with Individual A by using a web-based translation tool to translate Individual A's Spanish messages into English and OCE1 messages into Spanish. The messages below are as they appeared to OCE1 during the conversation through the web-based translation tool. The conversations from August 20, 2022, appear below.

Individual A: Greetings comrade, you sent me your [Communications Platform 1] on [Communications Platform 2], it's José Pérez [Individual A's alias that he also used for his Communications Platform 2 account]

Individual A: This way we can talk and see what we can support

Individual A: We have an enemy who is the Great Satan [United States]

OCE1: thank you comrade perez I'm Hasan from [Communications Platform 2], it's time for the great Satan to suffer. the great Satan, the United States and its agents, the time has come... we have to punish them for their crimes against our people...

OCE1: how can we help each other? here we sympathize and support your revolution and fight for justice... we need trusted comrades in the country of great

¹¹ I believe that OCE1 was communicating with Individual A based upon at least the following: (a) the telephone number associated with the account was a Colombian number; and (b) the conversation picked up on Communications Platform 1 where it had left off on Communications Platform 2 Messenger, consistent with the same individual, Individual A, being the participant.

satan who can help us... we have a good network... we need good comrades to help us

Individual A: Ok thanks comrade first you have to take care of the US intelligence and the Mossad who are behind you with the arrival of petro here we can control that we have the men to take him to the US if necessary and blow up their embassy for now the safest area for meet with us is Venezuela

Individual A: I have a man who can monitor the US and Israeli embassies and see all their movements and then carry out a large-scale and global operation.

OCE1: very well. we are interested to contact someone in the Great Satan country first, then we want to see if we can send someone to Great Satan country without traveling to venezuela if possible.

26. Based on my knowledge of the investigation and my training and experience, I believe that during the above messages, OCE1 and Individual A discussed a desire to attack the “Great Satan,” meaning the United States. OCE1 also requested assistance through Individual A’s U.S.-based contact. This U.S. contact would assist OCE1’s representative in the United States to conduct the attack.

27. On or about August 23, 2022, OCE1 and Individual A continued their Communications Platform 1 conversation, which appears below.

OCE1: we have someone who can travel to Great Satan country. He is going to need help the first two months when he arrives to Great Satan country...He is going to need help to set up operations and help finding weapons...then after two months, we are going to send two more people to help with the mission.....it is important we find a trusted comrade in Great Satan country who is able to help us.

Individual A: We have a man from the ELN¹² in Grand Satan [sic] who is in charge of supporting the Mexicans with payments to Colombia. Due to the sensitivity of the operation, I can assign a man for that operation. for the weapons, there are no problems we have many that the cartels give us for security. after that contact we have to support them in a monetary way if you are going to finance that operation we are going to go in the same ship and if they achieve a great operation against great Satan, we need military and financial support for the organization

Individual A: And we can give him a house in a country area that we have. That person is my trusted man. That operation must be top secret and betrayal is paid for with death.

OCE1: we are going to send members to revenge the death of commander soleimani. this is a top secret mission. assign a man to help us do the operation. our people who are doing the operation are light brown skin, so assign a man so that the americans are not going to be suspicious if our men and your man are seen together. we are going to finance the operation. Our men speak english.

28. Based on my knowledge of the investigation and my training and experience, I believe that in these messages OCE1 and Individual A continued their discussions regarding a plan to attack the United States and how Individual A could provide assistance to OCE1.

29. On or about August 25, 2022, the conversation continued between OCE1 and Individual A on Communications Platform 1 and Individual A explained that he

¹² According to open sources, the ELN is a Colombian Marxist-Leninist guerilla organization formed in 1964. The ELN's goals are to adapt a socialist system in Colombia, eliminate foreign investments, and achieve political status like the recently disbanded FARC. The ELN focuses on kidnapping, extortion, illegal mining, drug trafficking, and attacks on economic infrastructure. As of October 8, 1997, the Secretary of State designated the ELN as an FTO. To date, the ELN remains a designated FTO.

would contact his “personal man” in the United States about providing assistance for the plot.

Individual A: Ok, excellent comrade, you don't speak Spanish and I don't speak English. If there is risk to the operation then we have to close this operation. I will contact my personal man and see if we have a house in large cities, which city would you like and I will take care of it.

Individual A: Steps to follow in the operation

Individual A: 1. having the safe house ready and our man to escort him, we need to talk.

Individual A: 2. Since then we need financial support for the organization

Individual A: 3. When starting the operation we will have to delete all records in the networks that involve us in the organization

Individual A: 4. We will only stay on this [Communications Platform 1]

Individual A: 5. The key to the operation will be GREAT SATAN

Individual A: 6. Due to the sensitivity of the operation, no one from the organization will contact him and if he is contacted and they do not give him this secret code, he is not our man.

Individual A: Give me the city that wants the house give me 15 days and let's make a call between you, me and our man from great Satan

Individual A: Or establish your contact and communication signature

Individual A: By achieving this operation successfully, we will be a brother to support each other wherever what we need most is instructors and weapons.

Individual A: Comrade to which organization you belong to know who our alliance will be. If he doesn't speak Spanish, I have a guerrilla who speaks English to bring him from the jungle.

OCE1: The secret code is: what is the date, January 7, 2020

OCE1: my organization is the shiite militia hezbollah in Iraq

30. Based on my knowledge of the investigation and my training and experience, I believe that during the above messages OCE1 and Individual A

discussed the operational security needed to accomplish a mission of this magnitude. In addition, the discussion led to the creation of a secret operational phrase to be used only by Individual A's "trusted man," namely the question, "What is the date?" and the response to validate, "January 7, 2020." I believe the person who would know this phrase would have knowledge and connections to Individual A and would be trusted to keep the operation secret.

31. On or about September 6, 2022, OCE1 requested from Individual A the Communications Platform 1 number of Individual A's trusted person in the United States in order to communicate with this trusted person:

OCE1: Hello jackal [Individual A].¹³ my person will have to travel to the country of the Great Satan sooner than expected. My person will arrive on the night of September 9. my person will need the Communications Platform 1 number of the trusted person because, for the security of the operation, I will not contact him after the trip. this is very urgent, you need to take action now

32. During their communications on Communications Platform 1 between September 10 and 11, 2022, OCE1 informed Individual A that the operative being sent to the United States would be communicating over Communications Platform 3. OCE1 provided Individual A the Communications Platform 3 account username and asked Individual A to have his "trusted man" contact the operative directly through Communications Platform 3.

33. As further described below, OCE1 thereafter created a separate online persona on Communications Platform 3 (OCE2) and posed as the above-referenced

¹³ Individual A had informed OCE1 that Individual A would be using the moniker "chacal" going forward. "Chacal" is the Spanish word for "jackal" and also sounds similar to "jackal."

Iraqi operative who was arriving in the United States on September 9, 2022. OCE1 then began to communicate with Individual A, via Communications Platform 3,¹⁴ while posing as OCE2.

34. On or about September 11, 2022, OCE2 continued to receive Communications Platform 3 messages from Individual A. Several of the messages appear below.

Individual A: Hasam [referring to OCE1] gave me your [Communications Platform 3] to support you in Chicago

Individual A: Our contact will give you the key January 07, 2020

Individual A: At the moment there is work but he will talk to you to fix your return and visit the places you want to see in Chicago

Individual A: Hasam tells me that you will give us some money after I coordinate everything with our man, we would like you personally to locate a western union point in Chicago and send us that money to Colombia, our man does not need to know about that money.

Individual A: [Sends a screenshot of a Communications Platform 3 account displaying the mobile telephone number [PANG Phone 1]]

Individual A: That's our contact his name is Harry

Individual A: I did not give him details of your operation because it was top secret, I only coordinated your stay and how he would take you to the places to visit. I will coordinate the weapons and send it to you

Individual A: For the weapons and money, you will deal with me this way, and I will take care of it with my contacts.

¹⁴ On or about September 9, 2022, OCE1 provided the name “abbas” for OCE2 (the Iraqi operative arriving in the United States) and the Communications Platform 3 name of OCE2 to Individual A. On or about September 11, 2022, OCE2 received a Communications Platform 3 message from account display name “J J”. J J informed OCE2 of the code “January 07, 2020.” Individual A is the only individual OCE1 discussed this code with. Also, the communications between this Communications Platform 3 account and OCE2 were consistent with the previous conversations between Individual A and OCE1. Therefore, I assess “J J” to be an account operated by Individual A.

Individual A: Our man already has the key and waits for you to contact him

OCE2: This is abbas. thank you. I do not read Spanish and I don't want to use the telephone translator because it is not accurate. Okay, I am going to wait on Harry to contact me in Communications Platform 3

Individual A: I told Harry that you would contact him, you can add him on [Communications Platform 3] and [Communications Platform 1]

35. Based on my knowledge of the investigation and my training and experience, I believe that in these messages Individual A provided OCE2 the contact for his "trusted man" in the United States, specifically the phone number and name of his contact "Harry." I believe that "Harry" is XUANYU HARRY PANG. The phone number Individual A gave for "Harry" is the same phone number as for PANG Phone 1 and PANG Account 1.

36. On or about September 9, 2022, OCE2 contacted "Harry" via Communications Platform 3 messenger using the phone number Individual A gave to OCE2.

OCE2: hello this is abbas. i was told to message you.

PANG: Hi

OCE2: what is the date?

PANG: January 07 2020 [the secret code Individual A and OCE1 discussed]

OCE2: hello harry i am happy that we are finally talking

OCE2: is this a good time to continue or are you busy

PANG: Sure we can talk

PANG: Am on my lunch break

PANG: How may I help u?

OCE2: i came to chicago last week and the plan was to meet you but you were working.

OCE2: our friend said that he told you about me

PANG: Yeah he told me to pick u up and book a hotel for u and drive u around

PANG: But it was very last minute

PANG: I didn't have time to arrange it
OCE2: i understand, it was a last minute, i am trying to do my best but i cant get it done by myself
PANG: I see
PANG: What do u need help with?
PANG: Pick u up?
PANG: Drive u around?
OCE2: yes
PANG: Book u a hotel?
PANG: When are u planning on arriving?
PANG: I try my best to see if I can do that for u
OCE2: what days of the week are you available...i understand you have a job
PANG: Monday to Friday
PANG: Sometimes Saturday
PANG: Just depends on the shift rotation
OCE2: i am trying to arrange for friday saturday Sunday
PANG: Ok I will do my best to help u out. I will let u know the dates
OCE2: i want the end of this week...make your arrangements and if anything changes i will message you.
PANG: I will look into it
PANG: Will let u know
OCE2: thank you harry
PANG: You are welcome
PANG: Do u want to stay in Chicago? Or what's ur travel plan?
Just so I know, so I can plan accordingly
OCE2: yes in chicago is best..i will give you more details soon...
PANG: Ok
PANG: I will see if I can take this weekend off
PANG: Will let u know
OCE2: very good
PANG: ok

37. Based on my knowledge of the investigation and my training and experience, I believe that PANG is the “trusted man” of Individual A based on PANG’s knowledge and use of the secret code phrase —“January 07 2020”— that was discussed between OCE1 and Individual A that would identify Individual A’s trusted man.

38. Between September 13, 2022 and September 14, 2022, PANG and OCE2 continued to communicate via Communications Platform 3 messenger regarding the logistics of an in-person meeting:

OCE2: Good morning harry, I'm staying with an associate in detroit and if thursday is too soon let us plan for next week and i will stay here until you have a meet location ready
PANG: I will text u later today
PANG: Currently at work
PANG: How are u brother?
OCE2: I am doing fine, I will feel better once I complete what I came for..I appreciate your help
PANG: Please tell me in detail what i can help you with
PANG: So this way i can prepare better
OCE2: for now a place to meet and then later a vehicle to see different locations...
PANG: Understood
PANG: This weekend i can't
PANG: But next weekend i can
PANG: Already talk to my boss to give me a day off
OCE2: when we meet, i will give you more details
PANG: Understood

39. On or about September 17, 2022, OCE2 and PANG continued to communicate via Communications Platform 3 messenger:

OCE2: Hello harry, are we set for a meet?
PANG: Next week on sunday we can meet
OCE2: very good. Any special time
PANG: Around noon?
OCE2: I am available at noon
PANG: Ok
PANG: We will meet, talk and go from there
OCE2: yes
PANG: Let u know the location as we get closer
OCE2: The date is Sunday 25
PANG: So september 25th noon
PANG: Yes
OCE2: very well
OCE2: Did commander jackal [Individual A] message you
PANG: Yesterday

PANG: Just asked me about the meeting
PANG: That's all
OCE2: good..I am going to tell commander hasan [OCE1] about the date
PANG: Ok brother
OCE2: very well..see you brother
PANG: See you

40. On or about September 25, 2022, CHS1 met with law enforcement and was equipped with an audio-recording device. CHS1 (using the same persona as OCE2) thereafter made contact with PANG outside the Ogilvie Train Station in downtown Chicago. The conversation began with introductions and small-talk and a discussion about each other's backgrounds. The conversation between PANG and CHS1 then shifted to the reason CHS1 wanted to have the meeting. Excerpts from a draft transcription of the audio recorded meeting between CHS1 and PANG appear below:

CHS1: So, as you know they told me you are the perfect person to help me with what I need to do.
PANG: Okay.
CHS1: So hopefully everything is going (UI) any problems (UI) everything will be okay.
PANG: Okay.
CHS1: Yeah.
PANG: So, tell me what...what do you need help on?
CHS1: So, as you know brother, it was hard on me. I came all the way down to my country. They killed my leader. Shaheed Qasem Soleimani.
PANG: Mmm hmm.
CHS1: They, my people, they don't let this go.
PANG: Mmm hmm.
CHS: Like without nothing
PANG: Mmm hmm.
CHS1: We need to revenge his death.
PANG: Okay

CHS1: So, they choose like this city 'cause you know it's a very big city. I need from you because you are familiar with the area and you are smart guy.

PANG: uh huh

CHS1: So, just like in the future, I will need some logistics stuff because like two people they gonna come here. You've told me how - what you can help me? I told you like everything's gonna appreciated.

PANG: Okay. I don't know what you're gonna need help on. That's the thing.

CHS1: Yeah, so for now I need like I'm just like, search around (UI) I see like places. I don't know if you can correct for me, I see the Bean (UI) do something [near the Bean sculpture].

PANG: Oh, Okay. Okay.

CHS1: I don't know if you know, like places.

PANG: I...I...oh, I understand what (UI) see what you're talking...talking about. Okay. How big of a thing?

CHS1: Sorry.

PANG: how big of a thing?

CHS1: the things?

PANG: how big?

CHS1: I mean all that (UI) like (UI) operation is gonna give you all the details.

PANG: Mmm hmm.

CHS1: But, I need to know what...what you can help us do something (UI).

PANG: Logistics.

CHS1: Yeah.

PANG: I can get'ch you...I can help you get around.

CHS1: That'd be perfect. How about the places?

PANG: The places?

PANG: regarding the places, this...this is the part where I don't...I...I don't know what'ch you guys have in mind or what are you guys looking for. Are you guys looking for like casualties?

CHS1: Just like..

PANG: or are you guys looking for like financial like...

41. Based on my knowledge of the investigation and my training and experience, I believe that during the above conversation CHS1 and PANG discussed possible locations around Chicago in which to execute an attack. At one point, PANG

wanted to confirm the intent of the attack, and asked whether the attack was meant to inflict casualties or was a possible financial attack. Additionally, PANG was informed that CHS1 was conducting the attack to avenge of the death of IRGC General Qasem Soleimani.

42. As the conversation continued, PANG discussed the logistical measures CHS1 should take to avoid getting captured by law enforcement. Specifically, PANG recommended to CHS1 that CHS1 should acquire fake IDs to be used to rent different locations within the city. PANG further informed CHS1 that PANG would be able to procure the fake IDs for CHS1 but would need a photo of the operatives with a white background. PANG also stated that he could conduct surveillance and check on the security of places in and around Chicago. When CHS1 recommended the “Bean” as a potential target within the city, PANG responded that in the city, there are a lot of “military people,” security can get tight, and that instead of the “Bean” they should look into events, such as festivals and food fairs. PANG also told CHS1 that PANG would look into upcoming events.

43. As the conversation continued, PANG stated that the “jackal”¹⁵ mentioned a money transfer. CHS1 affirmed where the money would be coming from and PANG explained that in order to avoid the “fed” getting involved they should use cryptocurrency for all money exchanges so that there is no “paper trail.”

¹⁵ As discussed in footnote 13, based on my training and experience, I believe PANG was referencing Individual A when he mentioned the “jackal,” because Individual A informed OCE1 that Individual A would be using the moniker “chacal” going forward. “Chacal” is the Spanish word for “jackal” and also sounds similar to “jackal.”

44. The conversation then continued between CHS1 and PANG:

CHS1: So, what else brother (UI), do you think?
PANG: Mmm, that's the...those are the three things that I can think of right now. Uh, helping you wise. And the other stuff, I don't know, like I said, I don't...I don't know what'ch you need help on as far as you...you want to secure weapons or...or are you looking for?
CHS1: I mean if you can, of course, we need weapons.
PANG: Like weapons here [in the United States] or weapons there [in Iraq]?
CHS1: Here.
PANG: Oh, here.
CHS1: Yeah.
PANG: I can.. I can ask around
CHS1: Really?
PANG: Yeah, I'll ask.
CHS1: Will be... will be huge favor.
PANG: Ok, I'll ask around.

45. Based on my knowledge of the investigation and my training and experience, I understand that during the above conversation PANG offered to inquire about finding weapons for CHS1 to help facilitate the attack in the city.

46. The conversation then continued between CHS1 and PANG:

PANG: Yeah. Uhm, got this kind of stuff. Uh, we're not gonna talk about it over...over the phone.
CHS1: No.
PANG: I'm just gonna send you a (UI) oh (UI).
CHS1: It's nice.
PANG: This...this place...this place is beautiful.
CHS1: Exactly.
PANG: You should look here.
CHS1: Exactly.
PANG: This place is beautiful. Yep. Uh...
CHS1: We'll...we'll time it exactly.
PANG: And then the whole operation will be referred to as, a tour guide.
CHS1: Yeah.
PANG: So, I will be like oh, when does the tour start.
CHS1: Exactly.

PANG: So, we don't even meet
CHS1: Yep, exactly
PANG: And then...
CHS1: So the tour, the tour coming in my (UI)
PANG: Then I (UI) oh, uh then...oh yeah, they need to take a fee.
You know...
CHS1: Exactly.
PANG: ...what I mean
CHS1: Yep, Yep.
CHS1: Or even you don't have to say the fee, say the gift.
PANG: Oh, okay.
CHS1: You need gift.
PANG: Okay.
CHS1: They need gift.
PANG: Okay.
CHS1: Uh, yeah.
PANG: And then I will...I'll be like...I'll...I'll say something like uh, for example I say for tools. These are...these are called tools.
CHS1: By the tools you mean the weapons.
PANG: These are called tools. Oh yeah, the tools uhm, there you. The tool...

47. Based on my knowledge of the investigation and my training and experience, I believe that during the above conversation, PANG instructed CHS1 to speak in code during their online communications and provided certain code words to use during their communications. Later in the conversation, PANG asked CHS1 what type of operation they were planning to conduct and whether the operation is going to use a “tool.” PANG then made the sound effect of gun fire followed by the sound effect of a bomb explosion and CHS1 responded that the plan was to do the first option with a tool (guns) and PANG responded with “okay.”

48. During the continued conversation, PANG asked CHS1 to clarify who CHS1 is referring to when CHS1 says “leader:”

PANG: When you say...when you say your leader do you mean military leader or?

CHS1: Yeah, Qasem Soleimani, (UI) Hizballah

PANG: Oh, Okay

CHS1: So, you mentioned some military places. Is it closer from here?

PANG: Not that close.

CHS1: No?

PANG: Two hours.

CHS1: (UI).

PANG: Those places, impossible.

CHS1: Really?

PANG: Because the military places have this heavily...heavily guarded...

CHS1: Yeah.

PANG: ...heavily guarded. And you have only two people coming? You can't e...won't be able to get through a gate.

CHS1: Yeah. You're right.

PANG: So...

CHS1: Do you think you can do some search of these places just in case?

PANG: I'll look it up.

49. Based on my training and experience, I believe PANG was offering to conduct surveillance of potential places to attack and send photos of these places based on his surveillance. CHS1 raised the possibility of a military base being a potential attack site because PANG previously had mentioned to CHS1 that the Chicago area contained a heavy presence of "military people." PANG explained that military bases are heavily guarded and would be difficult to attack but said he would look into them.

50. Toward the end of the conversation, CHS1 and PANG recapped what they had discussed, PANG agreed to take photos of different locations within the city, and they also discussed why the "Bean" was a bad choice given the police activity in the area at all times.

51. Following this in-person meeting between CHS1 and PANG, the online communications with Pang via Communications Platform 3 were again taken over by OCE2. On or about September 28, 2022, the following Communications Platform 3 messages were exchanged between OCE2 and PANG:

OCE2: hello brother harry
OCE2: I hope everything is going well
OCE2: did you have time to take pictures of the beautiful places that my friends wants to visit
OCE2: They especially want pictures of the military places you mentioned, they want to put it on their tour plan
PANG: working on it

52. On or about September 29, 2022, the following Communications Platform 3 messages were exchanged between OCE2 and PANG:

OCE2: okay brother
PANG: How are u brother?
PANG: There are a few things I been thinking about
PANG: And want to talk to you about
OCE2: tell me what are you thinking about
PANG: Remember u told me that it is difficult for the tourists [operatives] to visit?
PANG: Well why not visit Mexico first
PANG: And set up a business there
PANG: Then visit here long term
PANG: Meaning visiting and visiting and visiting and visiting
PANG: Multiple times
OCE2: it is an idea I can share with commander hasan, i can suggest it to him. I am sure he will have many questions
PANG: This way they can visit and see any tourist spots
PANG: Over the years
OCE2: The plan is for one tour [attack] and leave, I don't know if he wants to do multiple tours
PANG: Brother to be honest
PANG: The tourist most likely will not be leaving after the tour [meaning the attackers will be killed or arrested]
PANG: Simple because of the tourist spots you like
OCE2: the plan is to make the tour at any cost
PANG: Ok

PANG: Are u still in Chicago?
PANG: Want to meet and talk to u more
OCE2: I left
OCE2: when
OCE2: You want to meet
PANG: Was thinking this Saturday
PANG: If not, next weekend ok to
OCE2: Can you send me photos [of potential targets] before the meet to discuss options
PANG: Let's do this, this weekend I will go out to take pictures
PANG: And send to you
PANG: We meet next weekend
OCE2: Perfect

53. Based on my knowledge of the investigation and my training and experience, I understand that during the above messages PANG and CHS1 discussed the same plans that they spoke about during their in-person meeting in which PANG said he would take surveillance photos of areas around the city, in particular, military bases. In addition, I understand that during the exchange on September 29, 2022, PANG explained that the mission has a considerable amount of risk, especially because of the attack locations that CHS1 was focused on like the Bean and military bases. Therefore, the operatives who were going to perform the attack should not expect to come home. PANG asked OCE2 for another in-person meeting to discuss the plans. PANG also agreed to take surveillance photos of potential attack sites and proposed an in-person meeting for the following weekend.

54. On or about September 30, 2022, OCE2 and PANG exchanged additional communications via Communications Platform 3 messenger:

PANG: Brother good morning
PANG: Am going to start heading out to the tourist spot this evening and over the weekend
PANG: I have a question.

PANG: Will i be given the expenses that i need the traveling.
PANG: Cause am going to need expenses to get around
OCE2: good morning brother, yes all expenses will be taken care of
PANG: Ok brother
PANG: Send the to me [sic] [reimbursement for expenses] through bitcoins when u can.
PANG: I would really appreciate it.
PANG: In the mean while i will be heading out this evening around 5pm
PANG: I will keep u updated over the weekend
OCE2: very well brother
PANG: [photo of a QR code for a Bitcoin address]
PANG: Thats my bitcoin wallet
PANG: For the initial traveling and researching these tourist spots will cost around \$5000
PANG: Cause i need to get hotels and rent cars
OCE2: does that include the passports for our tourists
PANG: No it doesn't
PANG: That part is step 2
PANG: This is step 1
PANG: Research
OCE2: okay brother, that is good.
PANG: 
PANG: This expense includes what i need to pay other contacts to take pics of other tourist spots located in other major cities for me.
PANG: Not making a profit off u
PANG: This is pure expense
OCE2: do the chicago tourists sites first
PANG: Thats the plan
OCE2: it is our main tour city
OCE2: cash is king and no paper trail,, ill have the 5000 at our meeting next week
PANG: Ok

55. Based on my knowledge of the investigation and my training and experience, I believe that PANG and OCE2 discussed PANG getting paid for his part in the operation. PANG also mentioned that his efforts will be conducted in "stages," and that this was stage 1, "research," meaning gathering information about potential

attack sites. According to PANG, stage 2 of the operation was obtaining fake identification for the attackers. Physical surveillance conducted by FBI and the Navy, did not observe PANG rent vehicles or hotel rooms in the city.

56. On or about September 30, 2022, OCE2 and PANG exchanged multiple messages via Communications Platform 3 messenger:

OCE2: hello harry, I want you to know that our brothers in the IRGC, especially the Quds forces lead by the late martyr commander Solemani are very excited and they appreciate your effort
PANG: [Thumbs up emoji.]
PANG: Am on the way to the spots
PANG: I will get there later this evening
OCE2: They were suppose to carry out this operation but they couldn't travel. That is why my organization the hezballah in Iraq brigades stepped up on behalf of the Iranian IRGC to get it done
OCE2: Great work brother
OCE2: I'm briefing my commander
PANG: And take the pics of the tourist spots tomorrow morning
OCE2: Are you traveling outside the city
PANG: Yep
OCE2: Where is the place
PANG: North Chicago
OCE2: Great,
OCE2: Update me when possible
PANG: I will update tomorrow
OCE2: I'll be waiting
PANG: [Thumbs up emoji.]

57. In these messages, OCE2 explained he/she was working on behalf of two designated foreign terrorist organizations, KH and IRGC-QF. When PANG was made aware of the organizations with which OCE2 was notionally associated, PANG responded with a thumbs up emoji, confirming his understanding.

58. On or about October 2, 2022, OCE2 and PANG exchanged multiple messages via Communications Platform 3 messenger:

PANG: Brother
PANG: Am so tired
PANG: U will like what I got
PANG: Outside military base
[sends 00:00:11 seconds video]
PANG: No pic allowed
PANG: That's the best I can do
PANG: Very protected
[sends pictures]
PANG: Michigan Ave
PANG: Super busy
[Sends more pictures]
PANG: Train station
PANG: Pay attention to the cameras
PANG: This is only this weekend
PANG: More next weekend
PANG: We talk next weekend
OCE2: This is great brother, great effort and great job especially the military site..your continued support will help us accomplish our mission to avenge the death of our martyred leader Solemani and make the IRGS [sic] proud
PANG: Brother we will talk about everything next week
PANG: [sends a thirty-second video]
PANG: The only reason that i can walk up so close is because i have friends

[Start “secret” chat in Communications Platform 3]¹⁶

OCE2: Ok
PANG: [Sends thumbs up emoji]
OCE2: I see it
PANG: Perfect
OCE2: Is this different
OCE2: It is still [Communications Platform 3]

¹⁶ PANG moved the communications to a “secret” chat in Communications Platform 3. A “secret” chat in Communications Platform 3 provides additional operational security because the messages are end-to-end encrypted whereas regular messages are not end-to-end encrypted.

PANG: Not different
PANG: Is safer
PANG: Am about to go to work
PANG: We will talk later
OCE2: Okay , talk to you soon
PANG: Ok
PANG: Brother how are u?
PANG: I been thinking, i think that bitcoins would be a much better option than cash. Because of the following reasons, #1 it is simply not safe for me or you to be carrying that much cash around. This is chicago, people gets robbed everyday. #2 it is better not to have cash exchange hands when we meet. Is for security purposes. #3 me or you will have to explain to the police why we got that much cash on us if we get stop and questioned. #4 it will be a headache for me to take all that cash and try to deposit it to the bank. The bank will ask questions.
PANG: Simply put cash will not be the best option
PANG: Lets do bitcoins
PANG: I will forward u my bitcoin wallet
PANG: You can have people back home deposit bitcoins into it.
PANG: Is easier, faster, safer and untraceable
OCE2: I understand, I need your help to set that up. We will discuss further in the meeting. I also received late word because the IRGC is designated a foreign terrorist organization, one of our tourists will not be able to fly here direct, I will discuss with you other options to bring him in our meeting. I am going to send you a picture of the other tourist who is coming in to make the id
PANG: Ok
PANG: Then for this time only i will receive cash from you
PANG: I will help u set it up
PANG: In the future only Bitcoins
PANG: Thanks for understanding

59. Based on my knowledge of the investigation and my training and experience, during the above Communications Platform 3 conversations PANG provided surveillance photos of downtown Chicago and video surveillance of Naval Station Great Lakes, the U.S. Navy base in North Chicago, Illinois where PANG is stationed and resides. After the photos were exchanged, OCE2 explained to PANG

that members of the plot to attack the United States would not be able to make the trip because the IRGC is a designated terrorist organization. After being told of the FTO designation, PANG responded “ok” and continued to talk about the operational plan to use Bitcoin for future payments.

60. Between approximately October 3, 2022 and October 5, 2022, OCE2 and PANG continued to communicate via Communications Platform 3 messenger. During the communications, OCE2 asked PANG whether it was possible for PANG to acquire a Navy uniform and a cell phone that “will be used in a test for a detonator.” PANG responded “Brother these things take time. You are rushing in it. Let simply meet on saturday, talk and give me the money for expenses. And we go from there.” PANG later told OCE2, “Brother u will be happy at the meeting on saturday with what i have to tell you. Lets talk first then talk it over with ur people.”

61. On or about October 8, 2022, a second in-person meeting occurred between CHS1 and PANG at the Lake Bluff train station in Lake Bluff, Illinois near the U.S. Navy base, Naval Station Great Lakes. CHS1 was equipped with audio/video recording devices, which captured the meeting between CHS1 and PANG. The audio portion was transcribed by the FBI in draft form.

62. After initial greetings, CHS1 and PANG discussed the future operation:

PANG: So the reason I picked this place
CHS1: yeah?
PANG: Do you know why I picked this place?
CHS1: I mean I like it because it is away from (UI)
PANG: Another reason... is because you are very close to the base
[Naval Station Great Lakes]
CHS1: Oh really?
PANG: Yeah

CHS1: Oh awesome man
PANG: That's why I wanna meet with you here
CHS1: Ok
PANG: Just so you know what's going on
CHS1: Alright
PANG: umm
CHS1: So, I just wanna tell you my people they really like, these two videos and they like the base.
PANG: The reason I (stutters) my friend took a couple of pictures from inside the base for me and I'm really reluctant to send it to you
CHS1: yeah, so he take from inside
PANG: Is because you never know who's watching you but I'm going to show it to you.

63. Based on my knowledge of the investigation and my training and experience, I believe that PANG initiated the meeting with CHS1 to discuss more details about the plot to attack the Naval Station Great Lakes and was also aware of the risks of sending photos of the inside of the military base. Although aware of these risks, according to CHS1 and the recording, PANG showed photos of what appeared to be areas inside of the U.S. Navy base to CHS1 during their in-person meeting.

64. Later during their conversation, PANG told CHS1 that PANG was planning to go to Wisconsin later in the day to see a gun dealer who sells fully automatic Glock 18Cs. A Glock 18C is a pistol that has a select fire switch to allow the gun to function in both semi-automatic and fully automatic modes. PANG explained that he had not yet discussed prices regarding the Glocks but stated that if the Glocks were in good shape PANG would purchase two Glocks for the use by CHS1 during the operation. Based on physical surveillance, I do not believe PANG went to Wisconsin after his meeting with CHS1.

65. The conversation continued between CHS1 and PANG and PANG discussed different possibilities for attacks and areas PANG believed would cause maximum damage:

PANG: Michigan Avenue, Michigan Avenue is... That's Michigan Avenue, uh, the reason I took a picture of those streets is because remember, like you told me like you guys are looking for max damage, right?

CHS1: Yeah.

PANG: So... look at, look at, you saw the street [photos of Michigan Avenue that PANG sent to OCE2]. It was packed [with lots of people].

CHS1: Yeah, I see it was very busy. Yeah.

PANG: So think about it like if you have one guy just walking down the street, all of a sudden [rapid firing sound].

CHS1: Yeah.

PANG: So that's the reason I took a picture of the street.

CHS1: I just wanted to need to know.

PANG: And the reason I also took a picture of the bridge is because, what... I think there's... there's a river.

CHS1: Yeah.

PANG: And what goes on the river - a boat. So think about it... if you rent a boat, you get – you don't have to own one, you can rent one. Go on the boat, you can... the river can makes it anywhere.

CHS1: Yeah.

PANG: You can go anywhere you want. Park it, get out. Do a thing. Get on the boat, go somewhere else.

CHS1: Ok.

PANG: [UI] That's the only reason I took it.

66. Based on my knowledge of the investigation and my training and experience, I believe that the above during the communications between PANG and CHS1 discussed PANG's operational strategy and PANG advised CHS1 on which type of an attack would cause the most damage. PANG also suggested a packed bridge on Michigan Avenue in downtown Chicago would be a good attack target because the attackers could use the river as a means of escape after the attack.

67. After the operational talk concluded, PANG asked CHS1 whether they had brought “anything” [money] to the meeting for PANG. CHS1 related that he had brought \$3,000 dollars to pay PANG for the expenses that PANG had incurred while completing surveillance in the city and around the Navy base. PANG accepted the \$3,000 in cash.

68. During the continued conversation between CHS1 and PANG, CHS1 asked multiple times whether it would be possible for PANG to acquire military uniforms to get operatives onto the Navy base to facilitate an attack. The conversation continued when PANG confirmed that he would acquire the uniforms and the expected timeline:

CHS1: If you got it [the uniforms] today, just text me or call me.
PANG: Sounds good.
CHS1: Yeah, I told you [UI] one is my size, the other one, like smaller.
PANG: Skinnier or shorter?
CHS1: Like, eh... shorter, yeah, shorter. Alright, man?
PANG: Alright, bro.
CHS1: I'm waiting for you. Alright, brother, be safe.
PANG: Alright. I'll let you know later on tonight.
CHS1: Alright, brother.
PANG: Umm, the uniform I can probably make it, I'll- I'll try to make it happen by Monday. If not, Tuesday, the latest.
CHS1: Ok. Just make, sure, like same uniform they wear inside.
PANG: Ok, yeah. You want the camouflage one?
CHS1: Yeah.
PANG: Or the, the, or the formal uniform?
CHS1: What they... What they wore inside.
PANG: What they wore inside? Ok
CHS1: Yeah, yeah, yeah... because I need exactly same thing. This is the idea. They wearing same thing. Um, as I said don't worry about the cost, just tell me how much.
PANG: Ok.

69. Based on my knowledge of the investigation and my training and experience, I believe that during the above conversation PANG and CHS1 confirmed a timeline in which PANG would provide two Navy uniforms for the purpose of allowing the two operatives to wear them, obtain entry onto the Navy base, and conduct an attack. Through PANG's enlistment as a sailor, I believe PANG has direct access to purchase uniforms at any time on base and also possesses multiple uniforms.

70. During the in-person meeting between CHS1 and PANG, PANG showed CHS1 photos on PANG's phone. According to CHS1, these photos appeared to be of locations inside a military base.

71. On or about October 9, 2022, OCE2 and PANG communicated again via Communications Platform 3 messenger. Their exchanged messages appear below.

PANG: Brother I think I found a solution to the uniform issue
OCE2: I know you will. Send me what you have showed me yesterday on your phone from the inside [of the military base]. I'm still waiting
PANG: Ok.
PANG: This afternoon.
PANG: Am with someone at the moment
OCE2: Okay brother, I need it today
PANG: Ok
[PANG sends 9 photos]
OCE2: brother what is the solution to the uniform issue
OCE2: my commander like the pictures that you sent , he said we are moving forward with the plan
OCE2: what do you think the solution to the tools issue?
PANG: Tell u later today
OCE2: Ok
OCE2: and don't forget the phone harry
OCE2: harry do you have any updates
PANG: Working on it
PANG: Let u know in the morning

72. Based on my knowledge of the investigation and my training and experience, I believe that during this exchange between PANG and OCE2, PANG sent OCE2 restricted photos of the Navy base. Signs posted around the military base state that photography is prohibited. I have reviewed the photos and recognize them as depicting areas inside the Navy base, including the inside of a barracks, the exterior of the executive leadership offices, an interior view of the security gate and guards, classroom buildings, and the athletic field. PANG sent these photos to OCE2 in the context of discussions about a plan to attack the Navy base using uniforms provided by PANG on behalf of KH and IRGC-QF to avenge the death of IRGC General Soleimani.

73. On or about October 15, 2022, a third in-person meeting occurred between CHS1 and PANG at the Lake Bluff train station in Lake Bluff, Illinois near the U.S. Navy base, Naval Station Great Lakes. CHS1 was equipped with audio/video recording devices, which captured the meeting between CHS1 and PANG. During the recorded meeting, PANG and CHS1 continued their conversation regarding the purported plot by Iranian actors to attack the base at Naval Station Great Lakes. In accordance with their previous communications described above, PANG gave CHS1 two U.S. military uniforms and a cell phone. As noted above in paragraph 60, OCE2 had asked PANG to acquire a cell phone that “will be used in a test for a detonator.” During the October 15 meeting, when PANG provided the cell phone, he stated words to the effect of PANG did not know what CHS1 wanted to do with it but that CHS1 could figure it out. CHS1 responded regarding the phone that his “people” would take

care of it. Additionally, as described above, PANG and CHS1 discussed PANG purchasing guns if they were in good shape. PANG explained to CHS1 that he had tested a gun but that it jammed. Based on the investigation to date, I am not aware of PANG visiting gun dealers or test-firing guns. Towards the end of the meeting, CHS1 gave PANG \$2,000 in cash and informed PANG that the remaining payments would be paid through Bitcoin.

IV. CONCLUSION

74. For the reasons stated herein, there is probable cause to find that PANG attempted to provide material support and resources to a designated foreign terrorist organization, namely IRGC-QF and KH, in violation of Title 18, United States Code, Section 2339B.

FURTHER AFFIANT SAYETH NOT.

Thomas Mata

Thomas Mata
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to by telephone on October 16, 2022.

Beth W. Jantz
Honorable BETH W. JANTZ
United States Magistrate Judge