

---

---

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

---

---

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Michael A. Hammer  
 :  
 BADER ALZHRANI : Mag. No. 23-10053

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

**SEE ATTACHMENT A**

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

**SEE ATTACHMENT B**

*Michael Hooper*

\_\_\_\_\_  
Michael Hooper, Special Agent  
Federal Bureau of Investigation

Special Agent Hooper attested to this Complaint  
by telephone pursuant to F.R.C.P. 4.1

January 26, 2023  
Date

at District of New Jersey  
County and State

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE

*Michael A. Hammer*  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**

(Receipt of Stolen Vehicles)

Between on or about January 14, 2023 and January 19, 2023, in the District of New Jersey and elsewhere, defendant,

**BADER ALZHRANI,**

knowingly and intentionally received, possessed, concealed, stored, and disposed of a motor vehicle, namely a 2020 Chevrolet School Bus, with the last four digits of the true Vehicle Identification Number assigned that vehicle being 9696, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313(a).

**Count Two**

(Transportation of Stolen Vehicles)

Between on or about January 14, 2023 and January 19, 2023, in the District of New Jersey and elsewhere, defendant,

**BADER ALZHRANI,**

did knowingly transport in interstate commerce a motor vehicle, namely a 2020 Chevrolet School Bus, with the last four digits of the true Vehicle Identification Number assigned that vehicle being 9696, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312.

## **ATTACHMENT B**

I, Michael Hooper, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about January 15, 2023, an individual called law enforcement to report a break-in at a home on Hillside Avenue (the “Hillside Avenue Residence”) in Livingston, New Jersey. Law enforcement responded to the Hillside Avenue Residence, which was an unoccupied residential home, and saw a fire extinguisher on the ground next to a damaged door. The fire extinguisher was also damaged, and based on its proximity to the damaged door, law enforcement believed that the person who trespassed into the Hillside Avenue Residence utilized the fire extinguisher to enter the home.

2. After securing the Hillside Avenue Residence, law enforcement saw several items, including an abandoned backpack, in the Hillside Avenue Residence’s basement. During a search of the backpack, law enforcement saw a Saudi Arabian passport<sup>1</sup> with the name Bader Alzahrani (“ALZHRANI”), along with other items that appeared to belong to ALZHRANI. Some of those personal items included journals (the “Journals”), which contained entries in English and Arabic.

3. Arabic translators reviewed the Journals and translated the following excerpts from the Journals from Arabic to English as follows:

- “Why didn’t you slaughter the police officer who threw the Quran?”
- “This is a war, and there will be losses, and collateral losses.”
- “It is a war and y’all [sic] started, feel the rage.”
- “Destruction of the new world and the earth will be destroyed from all sides.”
- “God I am ready for your orders. I want to live the rest of my life to serve you and the religion.”
- “Blood, blood, destruction, destruction. Allah”
- “Jews control everything.”

---

<sup>1</sup> ALZHRANI is in the United States on a student visa. However, in or around October 2022, ALZHRANI left the university in which he was enrolled and was reported missing.

- “Fuck each and every Jewish person.”
- “Fuck you privileged whitey.”

The Journals also included entries concerning “Jihad”<sup>2</sup> and how ALZHRANI did not intend to return to Saudi Arabia.

4. On or about January 17, 2023, the Livingston, New Jersey Board of Education reported that School Bus #42 (the “Livingston School Bus”) was stolen from a parking lot on Hillside Avenue, which was across the street from the Hillside Avenue Residence.<sup>3</sup> During the ensuing investigation, law enforcement located ALZHRANI in Stroudsburg, Pennsylvania during the early hours of January 19, 2023.

5. After ALZHRANI was taken into custody, law enforcement searched ALZHRANI incident to the arrest, and recovered the keys to the Livingston School Bus. During the course of the investigation, law enforcement located the Livingston School Bus in Stroudsburg, Pennsylvania. During a search of the abandoned Livingston School Bus, law enforcement recovered another journal that appeared to belong to ALZHRANI.

---

<sup>2</sup> A struggle or fight against the enemies of Islam.

<sup>3</sup> The fire extinguisher inside the Hillside Avenue Residence was the same kind of fire extinguisher that was supplied on Livingston school busses.