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Assistant United States Attorneys

Before: HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York

23 MAG 5824

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UNITED STATES OF AMERICA :
 : **SEALED COMPLAINT**
 :
- v. - : Violations of 18 U.S.C. §§ 924,
 : 1203, 2332, 2339A, 2339B, and 2
MOHAMMAD REZA NOURI, :
a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," :
a/k/a "Abu Abbas," :
 :
Defendant. :
----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

NILES P. LAPIERRE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE
(Conspiracy to Provide Material Support to a Foreign Terrorist Organization Resulting in Death)

1. From at least on or about April 15, 2019, up to and including at or about the time of filing of this Complaint, in Iraq, Iran, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization ("FTO"), namely, the Islamic Revolutionary Guard Corps ("IRGC"), which was designated by the U.S. Secretary of State as an FTO on or about April 15, 2019, and is currently designated as such, as of the date of the filing of this Complaint.

2. It was a part and an object of the conspiracy that MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, and others known and unknown, would and did knowingly provide the IRGC with material support and resources, including, among other things, property, services, lodging, weapons, personnel, and

transportation, knowing that the IRGC was a designated FTO (as defined in Title 18, United States Code, Section 2339B(g)(6)), that the IRGC engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act (“INA”)), and that the IRGC engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), resulting in the death of Stephen Troell, who was a U.S. national, in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(C), (E), and (F), and 3238.)

COUNT TWO

(Provision of Material Support to a Foreign Terrorist Organization Resulting in Death)

3. From at least on or about April 15, 2019, up to and including at or about the time of filing of this Complaint, in Iraq, Iran, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally provided, attempted to provide, and aided and abetted the provision of “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), to an FTO, namely, the IRGC, which was designated by the U.S. Secretary of State as an FTO on or about April 15, 2019, and is currently designated as such, as of the date of the filing of this Complaint, including, among other things, property, services, lodging, weapons, personnel, and transportation, knowing that the IRGC was a designated FTO (as defined in Title 18, United States Code, Section 2339B(g)(6)), that the IRGC engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that the IRGC engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), resulting in the death of Stephen Troell, who was a U.S. national, in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(C), (E), and (F), 2, and 3238.)

COUNT THREE

(Conspiracy to Provide Material Support for Acts of Terrorism Resulting in Death)

4. From at least in or about 2020, up to and including at or about the time of filing of this Complaint, in Iraq, Iran, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including, among other things, property, services, lodging, weapons, personnel, and transportation, knowing and intending that they were to be used in preparation for and in carrying out one or more of the following violations of Title 18, United States Code: (a) hostage-taking and hostage-taking conspiracy, in

violation of Title 18, United States Code, Section 1203(a); and (b) murder and conspiracy to murder of nationals of the United States located outside the United States, in violation of Title 18, United States Code, Sections 2332(a) and 2332(b), resulting in the death of Stephen Troell, who was a U.S. national.

(Title 18, United States Code, Sections 2339A and 3238.)

COUNT FOUR
(Provision of Material Support for Acts of Terrorism Resulting in Death)

5. From at least in or about 2020, up to and including at or about the time of filing of this Complaint, in Iraq, Iran, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally provided and attempted to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including, among other things, property, services, lodging, weapons, personnel, and transportation, knowing and intending that they were to be used in preparation for and in carrying out one or more of the following violations of Title 18, United States Code: (a) hostage-taking and hostage-taking conspiracy, in violation of Title 18, United States Code, Section 1203(a); and (b) murder and conspiracy to murder of nationals of the United States located outside the United States, in violation of Title 18, United States Code, Sections 2332(a) and 2332(b), resulting in the death of Stephen Troell, who was a U.S. national.

(Title 18, United States Code, Sections 2339A, 2, and 3238.)

COUNT FIVE
(Hostage-Taking Conspiracy)

6. From at least in or about 2020, up to and including at or about the time of filing of this Complaint, in Iraq, Iran, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to seize and detain and threaten to kill, injure, and continue to detain other persons, namely, victims residing in or around Baghdad, Iraq, in order to compel a third person, a governmental organization, and the U.S. Government to do

and abstain from doing an act as an explicit and implicit condition for the release of the persons detained.

(Title 18, United States Code, Sections 1203(a) and 3238.)

COUNT SIX
(Conspiracy to Murder U.S. Nationals)

7. From at least in or about 2020, up to and including at or about the time of filing of this Complaint, in Iraq, Iran, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to kill nationals of the United States.

8. It was a part and an object of the conspiracy that MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom was outside the United States, would and did kill U.S. nationals, which killing is murder as defined in Title 18, United States Code, Section 1111(a).

Overt Acts

9. In furtherance of the conspiracy and to effect the illegal object thereof, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, committed the following overt acts, among others:

a. In or about 2022, NOURI, an Iranian national and a Captain in the IRGC, gathered information on certain U.S. nationals residing abroad for IRGC to target and attack, including Stephen Troell, a U.S. national residing in Baghdad, Iraq, such as information about Troell’s address, family, contacts, employment, vehicle, travel, pattern of life, and the inside of his home.

b. On or about October 28, 2022, NOURI exchanged encrypted messages with one of his co-conspirators in the IRGC attack plotting (“CC-1”) about acquiring an assault rifle.

c. On or about October 30, 2022, NOURI exchanged encrypted messages with CC-1 about acquiring one or more vehicles for use in carrying out the IRGC’s planned operation to attack Troell.

d. On or about November 7, 2022, a group of NOURI’s co-conspirators—a team of operatives working on behalf of the IRGC—carried out the attack on Troell in Baghdad, shooting and killing him.

e. On or about November 7, 2022, shortly after the murder, NOURI exchanged encrypted messages with CC-1 about the status of the team of attackers, asking if “Our guys are safe.”

f. In or about late 2022 or early 2023, in the aftermath of the murder, NOURI harbored and protected the team of attackers in Iran, at the instruction of other IRGC officials.

(Title 18, United States Code, Sections 2332(b) and 3238.)

COUNT SEVEN
(Murder of a U.S. National)

10. On or about November 7, 2022, in Iraq and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly killed and aided and abetted the killing of a U.S. national outside the United States, namely, Stephen Troell, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, NOURI, working with his IRGC associates, carried out an IRGC plot to attack Troell in Baghdad, including by gathering information about Troell to facilitate the stalking and ultimate murder of Troell by operatives recruited to execute the attack, who shot and killed Troell on November 7, 2022.

(Title 18, United States Code, Sections 2332(a), 2, and 3238.)

COUNT EIGHT
(Causing Death Through Use of Firearms)

11. On or about November 7, 2022, in Iraq and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, namely, the offenses charged in Counts One through Four, and Seven, of this Complaint, willfully and knowingly used and carried firearms, including machineguns and destructive devices, and, in furtherance of such crimes, possessed such firearms, and aided and abetted the use, carrying, and possession of such firearms, and in the course of that crime caused the death of another person, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, NOURI facilitated the murder of Stephen Troell by operatives using assault weapons.

(Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(B)(i), 924(j), 2, and 3238.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

12. I am a Special Agent with the FBI, assigned to the FBI Washington Field Office’s extraterritorial counterterrorism squad, which has an area of responsibility over the Levant

region of the Middle East. I have been employed by the FBI since approximately 2015 and have been working on terrorism-related matters for approximately the past four years. Among other things, I have been involved in numerous counterterrorism investigations involving crimes against the United States. Based on my training and experience, I have become knowledgeable about criminal activity, particularly violations of the federal terrorism statutes. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers and other individuals, and upon my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of the investigation. Where the contents of conversations with others and statements by others are reported herein, they are reported in substance and in part, except where otherwise indicated. Some of the information recounted below is based on draft translations of Arabic and Farsi, which are subject to revision. Finally, to the extent there are grammatical, typographical, or spelling errors in any quotations in this affidavit, those errors appear in the original quoted material.

Overview

13. The Government of the Islamic Republic of Iran (“Iran”) is actively targeting nationals of the United States and its allies living in countries around the world for kidnapping and/or execution, both to repress and silence dissidents critical of the Iranian regime and to take vengeance for the death of Qasem Soleimani, a senior IRGC official who was killed by a U.S. drone strike in Baghdad on or about January 3, 2020. Just last year, U.S. law enforcement foiled a plot directed from Iran to assassinate a dissident journalist residing in New York City, after Iranian intelligence officials had previously plotted to kidnap that journalist for rendition to Iran and execution. U.S. law enforcement also detected and disrupted an IRGC plot to murder the former U.S. National Security Advisor in or around Washington, D.C. In November 2022, the Iranian regime struck in Iraq: a group of operatives working on behalf of the IRGC brutally murdered Stephen Troell, an American living in Baghdad, while he was driving home with his wife. As detailed herein, MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, is an IRGC Captain involved in the IRGC’s external attack plotting, and NOURI played a key role in the IRGC’s targeting and ultimate murder of Stephen Troell, whom NOURI appears to have believed was working as an American or Israeli intelligence officer.

14. On or about November 7, 2022, operatives working on behalf of the IRGC murdered Stephen Troell, a 45-year-old U.S. citizen living in Baghdad, where he was working at an English language institute. That evening, Troell was driving home from work with his wife when heavily-armed gunmen in two cars forced the Troells to stop shortly before they reached their residence, blocked any possible escape route, approached Troell on the driver’s side and, using an assault weapon, shot and killed Troell, as his wife witnessed the attack in the passenger seat.

15. MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, is a Captain in the IRGC responsible for, among other things, maintaining IRGC relationships with Iran-aligned militia groups in Iraq. NOURI, who resides in Iran and works in Iraq for the IRGC, was arrested by Iraqi authorities in connection with

Troell's murder and is currently in custody in Iraq. As described further below, seized electronic devices used by NOURI and his statements during an interview following his arrest, among other evidence, demonstrate that NOURI, on behalf of the IRGC, targeted Troell and certain other U.S. nationals; gathered intelligence for use in stalking and attacking Troell; was involved in the procurement of a vehicle for use in the lethal attack on Troell; and later harbored and protected in Iran certain of the operatives who physically carried out the murder.

16. In the months before the murder, MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, deployed his IRGC training to collect critical, highly personal information about Troell to facilitate stalking, attacking, and ultimately killing Troell. NOURI, with the assistance of co-conspirators, developed a source with access to details of Troell's life and daily routine. With this information, NOURI created intelligence documents for his IRGC associates and the operatives recruited to execute the attack, which included Troell's date of birth, coordinates of his residence, occupation, work schedule, telephone number, wife's name, and children's names, among other information.

17. In the weeks leading up to the murder, MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, coordinated with CC-1 in the plot targeting Troell, to procure some of the means for attacking Troell. On or about October 28, 2022, less than two weeks before the murder, NOURI received photographs, over an encrypted messaging application, of a "new AKS" assault rifle from CC-1, who offered it to NOURI. NOURI, in turn, asked CC-1 if the weapon came with a "silencer." A few days later, on or about October 30, 2022, NOURI and CC-1 exchanged encrypted messages about purchasing certain vehicles, including a vehicle with the same make and model as one of the two vehicles used about a week later to perpetrate the attack on Troell.

18. On the day of the murder, on or about November 7, 2022, MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, coordinated with CC-1 shortly before and immediately after the attack, as described in more detail below. NOURI and CC-1 spoke repeatedly that afternoon in the hours leading up to the attack. Less than a half hour after the attack, NOURI sent CC-1 encrypted messages inquiring about the wellbeing of the operatives tasked with carrying out the hit on Troell, asking, "The guys are fine?" and "They are doing well?" to which CC-1 responded, "One is injured." As the night went on, CC-1 continued to update NOURI, noting that "two so far" of the operatives on the hit squad—whom NOURI referred to as "Our guys"—had gathered safely since the murder, that "the rest are on the way," and that the injury sustained by one of their confederates was "slight." In the course of these encrypted messages, NOURI and CC-1 celebrated the events of the day and their success. That night, after the murder, NOURI left Iraq for Iran.

19. Following the murder, approximately nine of the operatives on the hit squad also left Iraq and entered Iran, where they joined MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant. In Iran, NOURI arranged housing for the operatives, providing them safe harbor in the aftermath of the murder. NOURI and another IRGC official addressed the operatives during their stay in Iran, offered their blessings to the hit squad, and told them that Troell was purportedly a spy on behalf of America

and Israel, that Troell threatened Islam by attracting Iraqi youths to the Jewish religion and spreading it in Iraq, and that Troell therefore deserved to be murdered.

20. On or about March 24, 2023, Iraqi authorities arrested MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, and others, in connection with their roles in the murder of Troell. As set forth below, in a subsequent interview in Iraq conducted by a judge and in the presence of counsel, NOURI stated, among other things, that he is a Captain in the IRGC, that he was tasked by the IRGC with collecting information about Troell that he incorporated into intelligence reports, and that he protected the operatives who carried out Troell’s murder in Iran following the attack.

The IRGC

21. The IRGC is an Iranian military and counterintelligence agency under the authority of Iran’s Supreme Leader and is composed of ground, naval, and air forces, as well as other components—such as an internal militia and an external operations force, the IRGC-Qods Force (“IRGC-QF”).¹

22. On or about October 13, 2017, the U.S. Department of the Treasury, Office of Foreign Assets Control (“OFAC”), designated the IRGC as a Specially Designated Global Terrorist under Executive Order 13224, relating to global terrorism, for its key role in supporting Iran’s involvement in international terrorism and particularly the terrorist activities of IRGC-QF. In its announcement, OFAC noted that the IRGC “has played a central role to Iran becoming the world’s foremost state sponsor of terror” and highlighted the IRGC’s support for “the lethal activities of Hizballah, Hamas, and other terrorist groups.”²

23. On or about April 15, 2019, the U.S. Secretary of State designated the IRGC as an FTO under Section 219 of the INA. In announcing the designation, the State Department noted that:

The IRGC FTO designation highlights that Iran is an outlaw regime that uses terrorism as a key tool of statecraft and that the IRGC, part of Iran’s official military, has engaged in terrorist activity or terrorism since its inception 40 years

¹ See National Counterterrorism Center, Counterterrorism Guide: Islamic Revolutionary Guard Corps (IRGC) (Mar. 2022) (*available at* dni.gov/nctc/ftos/irgc_fto.html).

² See Treasury Designates the IRGC under Terrorism Authority and Targets IRGC and Military Supporters under Counter-proliferation Authority (Oct. 13, 2017) (*available at* <https://home.treasury.gov/news/press-releases/sm0177>).

ago. The IRGC has been directly involved in terrorist plotting; its support for terrorism is foundational and institutional, and it has killed U.S. citizens.³

24. Among its activities, the IRGC plots and conducts attack operations outside Iran targeting, among others, U.S. citizens residing abroad and in the United States. For example, for at least approximately several years, the Government of Iran has targeted a journalist, author, and human rights activist who is a U.S. citizen of Iranian origin—and prominent critic of the Iranian regime—residing in New York City (“Victim-1”). In July 2021, an indictment returned by a grand jury in the Southern District of New York was unsealed charging an Iranian intelligence officer and three Iranian intelligence assets with kidnapping conspiracy and other offenses based on their participation in a plot on behalf of the Government of Iran to kidnap Victim-1 for rendition to Iran. *See United States v. Farahani, et al.*, 21 Cr. 430 (RA) (S.D.N.Y.). The Government of Iran has continued targeting Victim-1, and in January 2023, an indictment returned by a grand jury in the Southern District of New York was unsealed charging three members of an Eastern European organized crime organization tied to Iran with murder for hire and other offenses for attempting to assassinate Victim-1 on U.S. soil. *See United States v. Amirov, et al.*, S4 22 Cr. 438 (CM) (S.D.N.Y.). As set forth below, cellphones used by MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, which were seized at or around the time of his arrest in Iraq, contain images of IRGC targets in addition to Troell—including photographs of Victim-1, as well as a social media post by Victim-1 critical of the Iranian regime. *See infra* ¶ 30(i).

25. The IRGC has publicly stated its desire and intention to conduct operations targeting those perceived to be enemies of the Iranian regime, including Americans. In particular, the IRGC has publicly stated its desire to avenge the death of Qasem Soleimani, who was killed on or about January 3, 2020 by a U.S. drone strike in Baghdad. In August 2022, an IRGC member was charged with plotting to assassinate the former U.S. National Security Advisor in or around Washington, D.C., likely in retaliation for the death of Soleimani. *See United States v. Poursafi*, 22 Mag. 176 (D.D.C.). Prior to his death, Soleimani served as the Commander of the IRGC-QF, which is the IRGC division primarily responsible for extraterritorial and clandestine military operations.⁴ Shortly after Soleimani’s death, a spokesperson for the IRGC stated that the IRGC would “avenge the blood of this martyr,” referring to Soleimani, and that “[t]he joy of the Zionists

³ *See* Designation of the Islamic Revolutionary Guard Corps (Apr. 8, 2019) (*available at* <https://2017-2021.state.gov/designation-of-the-islamic-revolutionary-guard-corps/index.html>).

⁴ OFAC has stated that the IRGC-QF “is the Government of Iran’s primary arm for executing its policy of supporting terrorist and insurgent groups. The IRGC-QF provides material, logistical assistance, training and financial support to militants and terrorist operatives throughout the Middle East and South Asia. *See* Fact Sheet: Designation of Iranian Entities and Individuals for Proliferation Activities and Support for Terrorism (Oct. 25, 2007) (*available at* <https://www.treasury.gov/press-center/press-releases/Pages/hp644.aspx>).

and Americans will in no time turn into mourning.”⁵ As set forth below, seized devices used by MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, contain photographs and videos showing NOURI with Soleimani and a video with a personalized message to NOURI’s family from Soleimani. *See infra* ¶ 30(c)(v). On the day Troell was murdered, NOURI visited a religious site associated with mourning for Soleimani’s death, shortly before NOURI left Iraq for Iran. *See infra* ¶ 31(i).

The Murder of Troell

26. On or about November 7, 2022, gunmen armed with assault weapons murdered Troell in Baghdad. Based on my review of law enforcement records and reports, video surveillance footage from cameras in Baghdad that captured the murder, and conversations with other law enforcement officers, I have learned the following, in substance and in part:

a. At the time of Troell’s murder, in November 2022, Troell, his wife, and their children lived in the Karrada neighborhood of Baghdad. On or about November 7, 2022, shortly before he was murdered, Troell and his wife were driving to their home in a white sport utility vehicle (the “Troell Vehicle”).

b. At approximately 6:57 p.m., about three minutes before the Troell Vehicle would turn into an alleyway near the Troells’ home, a white sport utility vehicle (“Vehicle-1”) entered the alleyway from the opposite direction. The alleyway was relatively narrow and Vehicle-1 waited, effectively blocking the alleyway for any other vehicle attempting to come through from the opposite end. A still shot from the video surveillance showing Vehicle-1 entering the alleyway is below:



⁵ *See* Iran’s Revolutionary Guards, Anti-U.S. Forces Will Avenge Soleimani – IRGC Spokesman (Jan. 3, 2020) (*available at* <https://www.reuters.com/article/iraq-security-blast-irgc/irans-revolutionary-guards-anti-u-s-forces-will-avenge-soleimani-irgc-spokesman-idUSL8N2980T6>).

c. At approximately 7:00 p.m., Troell, driving the Troell Vehicle with his wife in the passenger seat, turned into the alleyway from the opposite direction as Vehicle-1 had entered. As the Troell Vehicle turned into the alleyway, Vehicle-1 immediately turned left to block the Troell Vehicle (as pictured below left). Then, seconds later, a black sedan (“Vehicle-2”) pulled up immediately behind the Troell Vehicle (as pictured below right), which trapped the Troell Vehicle in the alleyway between Vehicle-1 and Vehicle-2.



Almost immediately after Vehicle-1 and Vehicle-2 boxed in the Troell Vehicle, two individuals exited from Vehicle-2, at least one of whom appears in the video to be carrying a firearm. At approximately the same time, two other individuals—at least one of whom appears in the video to be carrying a firearm—exited Vehicle-1 and came down the alleyway towards the front of the Troell Vehicle.

d. After the assailants exited Vehicle-1 and Vehicle-2, all four individuals approached the driver’s side door of the Troell Vehicle, where Troell was seated. Approximately several seconds after the group approached the Troell Vehicle, at least one of the assailants can be seen on the surveillance video pointing at the Troell Vehicle with what I recognize, based on my training and experience, as an assault rifle. Pictured below are screenshots of the attacker—indicated with a black circle—pointing a weapon at the Troell Vehicle and firing



the rifle at the Troell Vehicle. The image on the right is an enlarged version of the image on the left.

e. From the time the assailants exited their vehicles, the attack took approximately 20 seconds. Almost immediately after the attack, the assailants re-entered Vehicle-1 and Vehicle-2 and drove away.

f. Iraqi authorities responded to the scene, and Troell was taken to a Baghdad hospital, where he was pronounced dead.

g. Troell's wife, who was in the passenger seat of the Troell Vehicle during the attack, was not struck by any of the bullets fired into the Troell Vehicle in the course of the attack.

The Defendant's Interview

27. Based on my review of law enforcement records and reports and my conversations with other law enforcement officers, including materials and information received from Iraqi authorities, I have learned the following, in substance and in part:

a. On or about March 26, 2023, Iraqi law enforcement arrested MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, at his residence in or around Baghdad.

b. Following the defendant's arrest, on or about March 29, 2023, NOURI was interviewed by an investigating judge of the Iraqi court system and a public prosecutor (the "Interview"). In connection with the Interview, NOURI was appointed Iraqi legal counsel, who was present during the Interview. NOURI agreed to answer questions during the Interview. Following the Interview, NOURI was provided an opportunity to review the transcribed summary of his statements during the Interview (the "Statement"). Following NOURI's review of his Statement, NOURI adopted the Statement by placing his thumbprint on each page of the Statement and signing his name. Based on my review of records relating to the Interview, including a draft translation of the Statement, I have learned that NOURI stated the following during the Interview, in substance and in part:

NOURI's Background in the IRGC

i. NOURI is a Captain in the IRGC serving as an advisor to armed militia groups in Iraq.

ii. NOURI is an Iranian citizen who resides in Tehran.

iii. NOURI has a law degree from the Azad University in Iran.

iv. NOURI enrolled in the IRGC military academy in 2011, and earned a commission as a "two-star" rank. NOURI has held various different positions for the IRGC. For example, in 2014, NOURI was tasked to serve in Iraq on behalf of the IRGC as a

military adviser. During that assignment, NOURI managed the ranks of militia fighters aligned with Iraqi security forces. NOURI then worked for the IRGC in Syria and other locations for a period of time before returning to Iraq.

v. Because of the nature of his work for the IRGC, NOURI does not reveal his true name while engaging in operations, and instead uses the alias “Abu Abbas.”

NOURI Targets and Researches Troell for the IRGC

vi. Approximately one month prior to Troell’s murder, NOURI’s superior officer, a Colonel in the IRGC (the “IRGC Colonel”) who is assigned to work in Iraq to transfer security and intelligence information, asked NOURI to gather personal and public information regarding Troell.

vii. The information that NOURI was directed to collect regarding Troell included his place of residence and the nature of his work.

viii. NOURI gathered public and private information related to Troell and Troell’s family, including photographs of Troell and his family.

ix. NOURI gathered such information regarding Troell and Troell’s family with the support of the IRGC intelligence team and members of armed militia groups.

x. NOURI prepared an IRGC intelligence report (the “Troell Targeting Report” or “Report”) that included detailed information regarding Troell and Troell’s family that NOURI had collected, and NOURI stated that he wrote in the Report, among other things, that Troell is a Jewish spy and spreads the Jewish religion inside Iraq, attracts Iraqi youths to the Jewish religion, and convinces them to abandon their Islamic religion.

The Troell Murder and Aftermath

xi. On November 7, 2022, the day of Troell’s murder, NOURI planned to leave Iraq with the IRGC Colonel. NOURI claimed that, at the airport, the IRGC Colonel received a call indicating that an operation had failed while being carried out, and told NOURI an important matter had occurred and that the IRGC Colonel would remain in Iraq, but that NOURI should return to Iran.

xii. After NOURI returned to Iran, the IRGC Colonel instructed NOURI to arrange housing and other services for a group of Iraqis who would be sent to Qom, Iran.

xiii. NOURI arranged housing in Qom, and a group of nine individuals came to stay with him, consisting of operatives who had carried out the murder of Troell.

xiv. The IRGC Colonel's deputy met with NOURI and the operatives in Qom. During the meeting, NOURI and the IRGC Colonel's deputy calmed the operatives, blessed them, told them that they were under the IRGC's protection, and stated that Troell deserved to be murdered because he was a spy for America and Israel and threatened the Islamic religion by attracting Iraqi youths to the Jewish religion and spreading it in Iraq.

xv. NOURI returned to Iraq while the operatives remained in Iran, and NOURI tasked other members of the IRGC with monitoring and protecting the operatives.

The Defendant's Devices Containing Troell Targeting Information

xvi. NOURI created for the IRGC in the lead-up to the attack on Troell the Troell Targeting Report, which was on a thumb drive seized by Iraqi law enforcement upon his arrest.

xvii. NOURI's personal cellphone was seized by Iraqi law enforcement when he was arrested. That cellphone contains pictures and information pertaining to Troell, including about how the information on Troell and Troell's family was collected. The cellphone also contains social media and other publicly available information about the Troell murder that NOURI gathered after the murder at the direction of the IRGC Colonel.

xviii. Certain of the devices recovered by Iraqi law enforcement during NOURI's arrest belonged to the IRGC Colonel, and were used for IRGC security and intelligence work.

The Defendant's Devices

28. Based on my review of law enforcement records and reports and my conversations with other law enforcement officers, including materials and information received from Iraqi authorities, I have learned, in substance and in part, that in connection with the arrest of MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, Iraqi law enforcement seized, among other things, a thumb drive ("Thumb Drive-1") and two cellphones ("Cellphone-1" and "Cellphone-2," collectively the "Nouri Cellphones," and together with Thumb Drive-1, the "Nouri Devices"). As described above, during the Interview, NOURI acknowledged his provision of targeting information to the IRGC prior to the attack on Troell. As detailed below, NOURI's electronic devices show that he was also involved in the planning and execution of the attack on Troell. In particular, the Nouri Devices contain evidence of, among other things, NOURI's involvement in (i) collecting and storing information about IRGC targets, including Troell and others; (ii) securing firearms for use in the IRGC's attack plotting; (iii) securing a vehicle for use in the attack on Troell; and (iv) coordinating with CC-1 before and after Troell's murder.

Thumb Drive-1

29. Based on my review of Thumb Drive-1, I have learned the following, in substance and in part:

a. Thumb Drive-1 contains multiple documents with detailed information about Troell, including Troell's address, employment history, contact information, travel history, pattern of life, and the inside of Troell's residence.

b. One document on Thumb Drive-1 is a report containing detailed personal information about Troell, which I believe, based on my training, experience, and participation in this investigation, is the Troell Targeting Report that NOURI prepared for the IRGC. *See supra* ¶ 27(b)(x). I further believe, based on the foregoing and the other facts set forth below, that Thumb Drive-1 is the thumb drive referenced during the Interview by NOURI that NOURI used to store the Troell Targeting Report and that was seized by Iraqi law enforcement at the time of his arrest, *see supra* ¶ 28. The Report, which is approximately two pages long, includes the following information about Troell:

- i. Troell's date of birth;
- ii. the addresses of Troell's former and then-current residences in Baghdad, including the specific geocoordinates of Troell's then-current address;
- iii. that Troell drove a "2019 Prado – with license plate number 46322 H / Baghdad," which was the model and license plate of the Troell Vehicle in which Troell was later attacked;
- iv. Troell's phone numbers;
- v. that Troell had served in the U.S. Army and participated in "the occupation of Iraq";
- vi. the title and location of Troell's occupation at a particular English language institute in Baghdad, and details about the hours of Troell's daily work schedule;
- vii. "Stephen's meeting places," which were two specified restaurants in Baghdad;
- viii. assertions about Troell's purported work as a spy;
- ix. the assertion that "Stephen is working on opening the largest number of churches in Iraq and Baghdad in particular, where [Troell] plans over the next 20 years to open (1,000 churches in Baghdad) and (2,000 in all of Iraq)"; and
- x. detailed information about the inside of Troell's residence, including particular rooms, based on information provided by a "source."

c. Based on my training and experience, I believe that the type of information described above that NOURI collected and included in the Troell Targeting Report carried significant value for NOURI’s co-conspirators tasked with the physical execution of the IRGC attack against Troell. Indeed, as described *supra* ¶ 26, the operatives who carried out the ambush of Troell on November 7, 2022 knew when, in what vehicle, and on what route Troell would be returning home from work, and they arrived in the alleyway near Troell’s residence to execute the attack just minutes before Troell entered the alleyway.

d. Thumb Drive-1 contains at least one other document with additional information about the English language institute where Troell worked in Baghdad.

e. Thumb Drive-1 contains a document with detailed personal information about a second U.S. national residing in Baghdad and another apparent target of the IRGC (“Victim-2”). The document is similar to the Troell Targeting Report, and includes information about Victim-2’s date of birth, spouse, children, address (including specific geocoordinates), occupation, meeting places, travel history, pattern of life, and inside of Victim-2’s residence.

f. Thumb Drive-1 contains a PowerPoint file (“PowerPoint-1”), created on or about September 20, 2022, that consists of approximately 12 slides containing information about 12 different individuals, including Troell and Victim-2, as well as other U.S. nationals. Based on my training, experience, and participation in this investigation, I believe that PowerPoint-1 is a targeting package: a compilation of information about 12 IRGC targets. Each slide contains similar, detailed information about the respective intended victim, including information such as: the victim’s name, date of birth, ethnic and religious background, schedule, occupation, marital status, hobbies, children’s schools, vehicle information, phone numbers, email addresses, and geocoordinates for their homes, as well as photographs of the victims and their family members. For example, the targeting slide for Troell, with “Stephen” above his photo on the left and detailed personal information about his life on the right, is below:



g. Thumb Drive-1 also contains another PowerPoint file (“PowerPoint-2”), which appears to have been deleted but that law enforcement recovered during forensic examination of the drive. Metadata from PowerPoint-2 indicates that the file was created on or about October 12, 2022 and last modified on or about October 13, 2022, *i.e.*, less than a month before the attack on Troell. Among other things, PowerPoint-2 references: a “plan” to “kidnap three targets” and “kill seven others”; that at least certain of the targets would be approached in the Karrada neighborhood of Baghdad, which is the area where Troell resided and was killed; “assassination squads” and the use of multiple vehicles to carry out the operations; and the use of weapons including “AKS rifles with silencers.”

30. Based on my review of the Nouri Cellphones, as well as subpoena returns from legal process issued in the course of this investigation, I have learned the following, in substance and in part:

a. The Nouri Cellphones are both registered in the name “Mohammad Reza Nouri” with a particular email address that includes the defendant’s name (“Email Account-1”), which is registered in the name “Mohammad Reza Nouri.”

b. User information for Cellphone-2 identifies Cellphone-2 as “Mohammad Reza’s iPhone.” Additionally, Cellphone-2 contains communications from an encrypted messaging application number ending in -4545, which is listed as the text message recovery account for Email Account-1.

c. The Nouri Cellphones contain multiple forms of identification, photographs, videos, and receipts depicting or belonging to MOHAMMAD REZA NOURI, a/k/a “Muhammad Rida Husayn ‘Ali Asghar Nuri,” a/k/a “Abu Abbas,” the defendant, further evidencing that NOURI used the Nouri Cellphones. For example:

i. Cellphone-1 contains photographs of identification documents for NOURI, including: (i) an Iranian national identification card in the name “Mohammad Reza Nouri”; (ii) an Iraqi national identification card for “Muhammad Rida Husayn Nuri”; (iii) a Hizballah identification card for “Muhammad Husayn Nuri”⁶; (iv) a current Iranian passport in the name of “Mohammad Reza Nouri”; (v) a birth certificate in the name “Mohammad Reza Nouri”; and (vi) an “Armed Forces Health Insurance Organization” document in the name “Mohammad Reza Nouri.”

ii. Cellphone-1 contains copies of multiple receipts for flights apparently taken by NOURI, including travel between Baghdad and Tehran.

⁶ Hizballah, a designated FTO, is a Lebanon-based Shia Islamic organization with political, social, and terrorist components. Hizballah was founded in the early 1980s with support from Iran after the 1982 Israeli invasion of Lebanon, and its mission includes establishing a fundamentalist Islamic state in Lebanon.

iii. Cellphone-2, like Cellphone-1, contains photographs of identification documents for NOURI, including: (i) a photograph taken on or about February 21, 2023 of the same current Iranian passport for NOURI found on Cellphone-1 in the name “Mohammad Reza Nouri”; and (ii) the same Iranian national identification card found on Cellphone-1 in the name “Mohammad Reza Nouri.”

iv. Cellphone-1 contains multiple videos of NOURI, taken in or around late 2022, in which NOURI states his full name is “Mohammad Reza Nouri” and requests that his Iranian bank activate his account or reset his password.

v. The Nouri Cellphones also contain numerous photographs that NOURI (whom I recognize from the various identification documents located on the Nouri Cellphones as described above) appears to have taken of himself (*i.e.*, “selfies”), including selfies of NOURI with Soleimani, the former IRGC-QF Commander who was killed in a U.S. drone strike in Baghdad on or about January 3, 2020, *see supra* ¶¶ 13, 25. Cellphone-2 contains a video in which Soleimani sends a message to NOURI’s daughter and parents, encouraging NOURI’s daughter to live a chaste life and wishing his parents God’s protection. In the video (a screenshot of which is pictured below left), NOURI kisses Soleimani on the cheek. Cellphone-1 further contains the photograph below right of NOURI and Soleimani, along with what appear to be other IRGC members and supporters, in which NOURI appears to be taking the photograph in the bottom-left corner, and Soleimani appears in the center wearing a black jacket.



vi. A call number assigned to Cellphone-1 ends in -9214. During the Interview, NOURI stated, in substance and in part, that he used a cellphone with that particular call number.

d. Based on the foregoing, and my training and experience, I believe that the Nouri Cellphones were used by NOURI.

e. The content of the Nouri Cellphones, like Thumb Drive-1, further evidences NOURI’s role in targeting Troell. Among other things, the Nouri Cellphones contain images of Troell, images of Troell with his family, and other personal identifying information about Troell. For example, Cellphone-1 contains an image of Troell, with his head circled,

alongside other individuals (pictured below and as circled in the image recovered from Cellphone-1, which appears to be a post from an Iraqi media outlet following Troell’s murder):

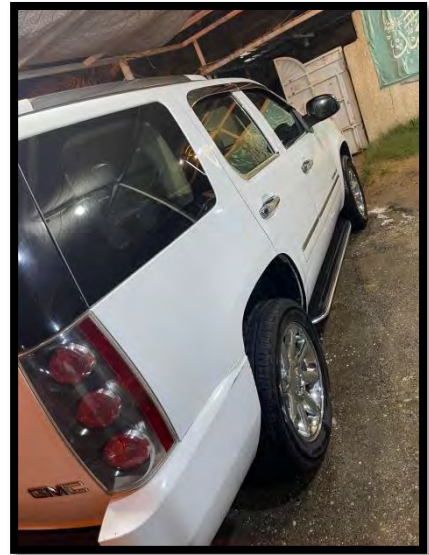


f. The Nouri Cellphones contain photographs of Troell’s dead body and news articles about Troell’s murder. As set forth above, *see supra* ¶ 27(b)(xvii), NOURI collected such information about Troell’s death after the murder.

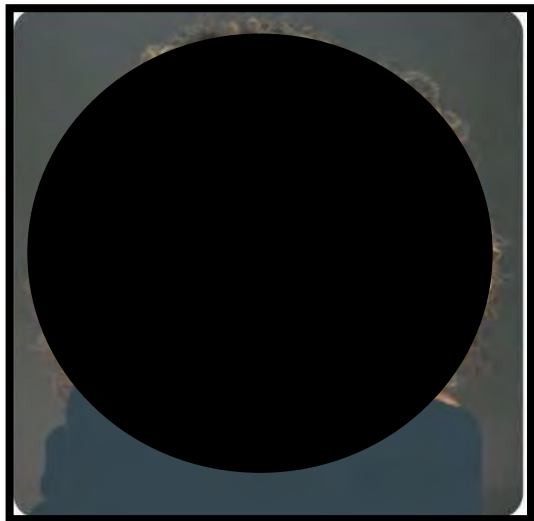
g. The Nouri Cellphones contain numerous photographs of firearms, including firearms that I believe, based on my training and experience, to be automatic weapons similar to those used by NOURI’s co-conspirators to murder Troell, *see supra* ¶ 26(d). For example:



h. The Nouri Cellphones contain images of a vehicle that appears to be the same make and model (white GMC Yukon) as Vehicle-1, *i.e.*, one of the vehicles used in the attack on Troell, *see supra* ¶ 26(b). As described below, less than 10 days before the murder, NOURI and CC-1 exchanged encrypted messages about acquiring a vehicle for use in the attack operation. *See infra* ¶ 32(e). Below, images of the vehicle from the Nouri Cellphones are on top, with an image of Vehicle-1 from video footage of the murder at bottom:



i. The Nouri Cellphones contain images of Victim-1, who, like Troell, has been targeted by the Iranian regime, and who was the victim of a kidnapping and subsequent assassination plot to silence her criticism of the Iranian regime’s human rights abuses, *see supra* ¶ 24. For example:



In the social media post by Victim-1 above right, Victim-1 criticizes the Iranian regime, writing: “This mother who has lost two of her children abroad, gives life We laugh at the mullahs who wanted to make us a generation that loves the Islamic Revolution.”

31. In addition to photographs of Troell and Victim-1, Cellphone-1 also contains images of an individual who was apparently murdered in his car (“Victim-3”). For example, Cellphone-1 contains the image below, which, based on my review of metadata contained in Cellphone-1, was dated on or about May 24, 2022:



The redacted portion of the image above shows Victim-3, slumped over, with blood on his arm, neck, and back. Cellphone-1 also contains the image below, which is undated:



Based on my training, experience, and participation in this investigation, I believe that the image immediately above is indicative of surveillance being conducted of the pictured white sedan, which appears, based on my review of Cellphone-1, to be the same vehicle in which Victim-3 was murdered, as depicted in the first photograph above. Further, based on the shattered glass in the driver's side window and Victim-3's injuries shown in that photograph, I believe that, just as Troell was killed by assailants shooting him through the driver's side of the Troell Vehicle, *see supra* ¶ 26, the murder of Victim-3 was carried out in a similar way.

NOURI Uses the Nouri Cellphones to Communicate in Furtherance of Troell's Murder

32. Based on my review of the Nouri Cellphones, and my training, experience, and participation in this investigation, I have learned the following, in substance and in part:

a. MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, using Cellphone-1 and Cellphone-2, exchanged hundreds of encrypted messages on a particular encrypted messaging application with CC-1, who was using an account ending in 8770, including as described below.

b. On or about September 20, 2022, NOURI, using Cellphone-1, exchanged a series of encrypted messages with CC-1. In the course of the exchange, NOURI wrote to CC-1, "My dear, I burdened you; forgive us. Are things going OK?" Minutes later, NOURI sent CC-1 a list that read: "Badge / cars / Citizenship / House / The guy's schedule / PowerPoint / The schedule for [a particular individual's] requests." NOURI then wrote, "But don't send it because the name is on it." Based on my training, experience, and participation in this investigation, I believe that, in these messages, NOURI was discussing the mission of targeting and attacking Troell, and was cautioning CC-1 not to send the "PowerPoint" regarding the attack plan because it included Troell's name. As described above, *see supra* ¶ 29(f), PowerPoint-1 appears to have been created on or about the same day as this exchange between NOURI and CC-1.

c. On or about September 23, 2022, NOURI, using Cellphone-1, exchanged a series of encrypted messages with CC-1. In the course of the exchange, NOURI and CC-1 discussed “the PowerPoint” on a “flash” drive, and CC-1 stated, “I will bring the flash to you so you can check it.” As the exchange continued, NOURI wrote that “those working on this matter should not be working on anything else,” and later stated: “I will be viewed as a person who just talk but nothing in terms of execution. In this case, you should be supporting me, because we are one body undertaking an unprecedented job on a different level.” CC-1 responded that CC-1 was “at your service . . . but there is a lot of pressure. The number of young men is limited, and these special jobs require very special people.” Based on my training, experience, and participation in this investigation, I believe that, in the foregoing messages, “the PowerPoint” was a reference to PowerPoint-1, described *supra* ¶ 29(f), which contains slides with information about 12 IRGC targets, including Troell and Victim-2. I further believe that NOURI was conveying the urgency and importance of the IRGC’s task of targeting and attacking Troell (“we are one body undertaking an unprecedented job on a different level”). CC-1 conveyed that the number of operatives (“young men”) available to carry out the mission of attacking Troell was limited, because “special jobs require very special people.”

d. On or about October 20, 2022, after several unanswered messages from CC-1 trying to contact NOURI, NOURI responded, using Cellphone-1: “I apologize that I was not available; one of my guys was martyred.” Based on my training and experience, I know that “martyr” is a term commonly used by members and supporters of radical Islamic extremist and terrorist groups to refer to individuals who die in service of the aims of such groups. In this message, I believe that NOURI was conveying to CC-1 that one of NOURI’s men had died in service of a different terrorist or extremist mission.

e. On or about October 28, 2022, NOURI, using Cellphone-2, received encrypted photographs from CC-1 of what appears to be an automatic rifle, including the below photographs:



After receiving these photographs, NOURI, using Cellphone-2, exchanged the following encrypted messages with CC-1:

CC-1: Is it useful to you? It is for sale
CC-1: New AKS
NOURI: Silencer?
CC-1: No

Based on my training, experience, and participation in this investigation, I believe that, in the above exchange, CC-1 was offering to provide NOURI with the new automatic rifle depicted in the photographs (“New AKS”), and that NOURI responded by asking if the weapon had a “[s]ilencer.” As described above, *see supra* ¶ 29(g), PowerPoint-2 recovered from Thumb Drive-1 used by NOURI references the use of “AKS rifles with silencers” to carry out the attack operations discussed in the file.

f. The following day, on or about October 29, 2022, NOURI, using Cellphone-1, exchanged encrypted messages with CC-1 discussing purchasing one or more vehicles for use in the attack on Troell, including sport utility vehicles similar to Vehicle-1, which was used in the attack on Troell less than 10 days later.

CC-1: My dear, please transfer 7,000,000 to the same account that I have with you.
CC-1: And let me know how much I owe you
CC-1: Don’t forget the hospital paper.
NOURI: Hajji,⁷ they are very old models [of cars].
NOURI: 2001
NOURI: How much are those?
CC-1: Hajji, this model is expensive and is the same price of a new Land Cruiser. Expensive!!
CC-1: I will ask now.
NOURI: Let him send us a Tahoe as well.

⁷ Based on my training, experience, participation in this investigation, and communications with an FBI linguist, I understand that “Hajji” is an Arabic title used to signify that the individual is deserving of respect.

NOURI: “But with the legal documentation,” isn’t that better?

CC-1: The legal Tahoe is expensive.

NOURI: 2009 and 2010 [models].

CC-1: They are available.

CC-1: Hajji, we want them only for the engagement [party], and after that, we are going to sell them.

CC-1: 22,000 or 20,000 according to how clean [the vehicles are].

Based on my training, experience, and participation in this investigation, I believe that, in the above exchange, NOURI and CC-1 discussed, among other things, that the vehicles under consideration for acquisition would be used only for the attack on Troell (referred to in coded terms as “the engagement party”), and that the operatives would then immediately get rid of the vehicles used in the attack by selling them.

g. The next morning, on or about October 31, 2022, CC-1 sent an encrypted message to NOURI, on Cellphone-1, stating, “Make your final decision about the vehicles.” Approximately seven minutes later, NOURI, using Cellphone-1, placed a call to CC-1, but did not reach him. Approximately 53 minutes later, NOURI received a call on Cellphone-1 from CC-1, which lasted approximately a little over four minutes.

h. On or about November 7, 2022—the day of the attack on Troell at approximately 7:00 p.m. local time in Baghdad—NOURI communicated with CC-1 using both of the Nouri Cellphones, via encrypted messages and voice calls:

Time (Local)	From	To	Message Content / Call Information
12:08:10 PM	Cellphone-1	CC-1	<i>Missed Call</i>
12:08:59 PM	Cellphone-1	CC-1	<i>Missed Call</i>
12:09:17 PM	Cellphone-1	CC-1	<i>Missed Call</i>
12:35:53 PM	Cellphone-1	CC-1	<i>Missed Call</i>
1:27:59 PM	Cellphone-1	CC-1	Where are you?
1:28:03 PM	Cellphone-1	CC-1	I need you urgently.
1:28:06 PM	Cellphone-1	CC-1	Hello
3:06:57 PM	Cellphone-1	CC-1	<i>Call for 9:28</i>
3:16:55 PM	Cellphone-1	CC-1	<i>Call for 0:22</i>
3:33:13 PM	Cellphone-1	CC-1	<i>Missed Call</i>
3:41:10 PM	Cellphone-1	CC-1	<i>Missed Call</i>
3:42:00 PM	Cellphone-1	CC-1	<i>Missed Call</i>
7:11:50 PM	Cellphone-2	CC-1	My dear
7:12:20 PM	Cellphone-2	CC-1	Read Oh God, the Facilitator

7:12:21 PM	CC-1	Cellphone-2	Trust [in God], dear
7:12:25 PM	Cellphone-2	CC-1	100 times
7:15:30 PM	Cellphone-2	CC-1	You have a second one?
7:27:17 PM	CC-1	Cellphone-2	No
7:27:41 PM	Cellphone-2	CC-1	The guys are fine?
7:27:53 PM	Cellphone-2	CC-1	They are all doing well?
7:28:01 PM	CC-1	Cellphone-2	One is injured
7:28:09 PM	Cellphone-2	CC-1	Where is he now?
7:28:12 PM	Cellphone-2	CC-1	With us?
7:28:23 PM	Cellphone-2	CC-1	What happened?
7:38:50 PM	Cellphone-2	CC-1	As soon as you can talk to me, let me know how you and the guys are all doing.
7:39:07 PM	Cellphone-2	CC-1	Do not make me so worried.
7:47:03 PM	Cellphone-1	CC-1	Hey my dear
7:47:13 PM	Cellphone-1	CC-1	Reassure me about yourself.
7:51:36 PM	Cellphone-1	CC-1	<i>Call for 4:00</i>
8:50:04 PM	CC-1	Cellphone-1	two
10:00:59 PM	CC-1	Cellphone-1	Missed Call
10:01:19 PM	Cellphone-1	CC-1	Hey my dear
10:07:47 PM	CC-1	Cellphone-1	Did you arrive?
10:09:17 PM	CC-1	Cellphone-1	Two so far.
10:09:27 PM	CC-1	Cellphone-1	And the rest are on the way.
10:09:40 PM	CC-1	Cellphone-1	Today is the birthday party.
10:15:36 PM	Cellphone-1	CC-1	Our guys are safe?
10:15:55 PM	Cellphone-1	CC-1	“Oh God, prayers on Muhammad and Muhammad’s family.” ⁸
10:16:04 PM	Cellphone-1	CC-1	God willing, they will be successful.
10:16:11 PM	Cellphone-1	CC-1	May God accept it.
11:07:01 PM	CC-1	Cellphone-1	Praise God. It was a slight injury.
11:07:13 PM	CC-1	Cellphone-1	All of them my dear
11:07:18 PM	CC-1	Cellphone-1	I wish you were here.

Based on my training, experience, and participation in this investigation, I believe that, in the course of the above communications, CC-1 informed NOURI that CC-1 “need[ed] [NOURI] urgently” on the afternoon of the attack on Troell, and that NOURI and CC-1 then spoke for nearly 10 minutes just several hours before the attack. After a period of a few hours without apparent

⁸ Based on my training, experience, participation in this investigation, and communications with an FBI linguist, I understand that “Oh God, prayers on Muhammad and Muhammad’s family” is a commonly used phrase in Arabic to indicate that something significant took place—here, the attack on Troell.

communication between NOURI and CC-1—the period during which CC-1 and the team of operatives were carrying out the planned attack—NOURI reached back out to CC-1 at approximately 7:11 p.m., just minutes after the conclusion of the attack. During the ensuing exchange, NOURI asked, without any prompting by CC-1, “The guys are fine?” and “They are all doing well?”—referring to the hit squad carrying out the attack, and further demonstrating NOURI’s integral role in and knowledge of the attack plot and timing. As the encrypted exchange continued, CC-1 informed NOURI that one of the operatives had been injured (“One is injured”), and updated NOURI as the operatives returned (“Two so far”; “And the rest are on the way”). NOURI expressed his hope that their co-conspirators who had executed the attack were safe (“Our guys are safe?”). After reassuring NOURI that “It was a slight injury” and that all of the attackers had returned safely (“All of them my dear”), CC-1 expressed his wish that NOURI—who had left Iraq for the safe haven of Iran that night—could be together with CC-1 and the rest of the attackers (“I wish you were here”). Based on my training, experience, and participation in this investigation, including NOURI’s claimed reference to a failed operation during the Interview, *see supra* ¶ 27(b)(xi), and CC-1’s reference to an injury sustained by one of the attackers and subsequent updates on the attackers returning safely, I believe it is possible that the attack plan was to kidnap Troell before killing him.

i. Based on my review of Cellphone-2, I have learned that on or about November 7, 2022—the day of the attack on Troell—NOURI took the below photograph of himself at approximately 6:36 p.m., approximately 30 minutes before the attack, and shortly before NOURI left Baghdad for Tehran. Based on my review of the location information associated with that photograph and open-source research, I believe that NOURI took the photograph at the Grand Mosque of Kufa, located approximately 3.7 miles from the Najaf airport where NOURI departed for Tehran that evening.



j. Based on my review of open sources, I have further learned that on or about January 3, 2020, the date of IRGC-QF Commander Soleimani’s death, a mourning prayer was held for Soleimani at the Grand Mosque of Kufa. I believe, based on my training, experience,

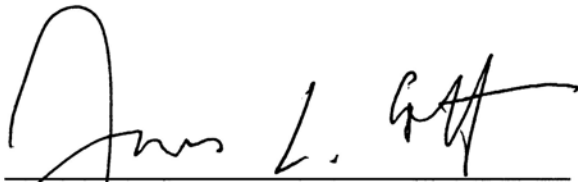
and participation in this investigation, that NOURI took the photograph at the Grand Mosque of Kufa shortly before the planned attack on Troell to signify that the attack was intended, at least in part, to avenge Soleimani's death.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of MOHAMMAD REZA NOURI, a/k/a "Muhammad Rida Husayn 'Ali Asghar Nuri," a/k/a "Abu Abbas," the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.

FURTHER, the Government respectfully moves for this Complaint and the associated arrest warrant to remain sealed, with the exception that this Complaint and the arrest warrant are unsealed for the limited purpose of disclosing the existence of or disseminating this Complaint and/or the arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant's arrest, extradition, or expulsion, or as otherwise required for purposes of national security.

/s/ Niles T. LaPierre, by the Court, with permission
NILES P. LAPIERRE
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of this
Complaint by reliable electronic means,
pursuant to Federal Rule of Criminal Procedure 4.1,
this 1st day of August, 2023



JAMES L. COTT
United States Magistrate Judge