

United States District Court
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

v.

SAFYA ROE YASSIN,
[DOB: 07/29/1977]

18 U.S.C. § 875(c)
NMT 5 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
\$100 Mandatory Special Assessment
Class D Felony

CRIMINAL COMPLAINT

Case Number: ↗ 16-mj-2009QPR

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

On or about August 24, 2015, in the Western District of Missouri, and elsewhere, the defendant SAFYA ROE YASSIN, did knowingly, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c).

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

(See attached Affidavit)

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

Stacie Lane
Stacie Lane, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

↗ Feb. 17, 2016
Date

at

Springfield, Missouri
City and State

↗
United States Magistrate Judge David P. Rush
Name and Title of Judicial Officer

David P. Rush
Signature of Judicial Officer

COPY

STATE OF MISSOURI)
)
COUNTY OF GREENE) ss.

AFFIDAVIT IN SUPPORT OF COMPLAINT

1. I, Stacie Lane, with the Federal Bureau of Investigation (FBI), being duly sworn, state the following is true and correct to the best of my knowledge and belief:
2. I am a Special Agent for the Federal Bureau of Investigation (FBI) in Kansas City, Missouri and have been assigned to this office since August 2011. I am currently assigned to Squad 12 (International Terrorism) which is a component of the Joint Terrorism Task Force (JTTF). I previously worked on a Cyber Crimes Task Force, from August 2011 to December 2012, Crimes Against Children squad from 2006 to 2011.
3. I worked on a variety of criminal matters while assigned to the Topeka (Kansas) Resident Agency from 2002 to 2006. As part of my duties with Squad 12, I have participated in the investigation of potential terrorist activity by organizations and individuals. During the course of these investigations, I have examined materials posted on the internet, including emails, blogs, chat messages, and other internet-based communications authored by individuals who are members or supporters of terrorist organizations. Through my experience, education, and training, I have become familiar with methods and tradecraft utilized by terrorist organizations to communicate or engage in activities in support of terrorism. I have gained expertise in the conduct of such investigations through training in seminars, classes, and every day work, related to conducting these types of investigations. I have written, executed, and assisted in over 20 search warrants on the federal level.
4. As a Special Agent with the FBI, I am authorized to investigate violations of laws of the United States and to execute arrest warrants issued under the authority of the United States.

5. The statements in this affidavit are based on my personal observations, training, experience, and information obtained from other agents and witnesses with direct knowledge of the facts of this case. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth the facts that I believe necessary to establish probable cause to believe that Safya Roe Yassin (hereinafter, "Yassin"), has committed violations of Title 18, United States Code, Sections 875(c) and 2 in the Western District of Missouri and elsewhere.

6. Along with other case agents, I have personally worked on this investigation involving Yassin a U.S. citizen and resident in the Western District of Missouri. As detailed below, this affidavit concerns a posting that was transmitted in interstate commerce by Yassin through the social network Twitter that contained threats to injure the person of at least two current employees of the United States. As explained in detail below, on August 24, 2015, and under the banner "We are the hackers of the Islamic State," Yassin retweeted the personal identifiable information of two Federal Bureau of Investigation agents with the statement "Wanted to kill" (§ 37). Numerous other tweets and retweets posted by Yassin are set forth in detail below, but examples include: (a) a link containing photographs, addresses, other contact information, and even credit card information of United States Army, Navy and State Department employees (§ 29); (b) a tweet that a media personality "would be better off without her head" (§ 33); and, (c) a link in a retweet that lists the town of residence and phone number for approximately 150 United States Air Force personnel with the following quote: "Rejoice, O supporters of the Caliphate State, with the dissemination of the information to be delivered to lone wolves . . . God said: 'And slay them wherever you may come upon them'" (§ 34). As detailed below, this investigation involves criminal postings believed to be made by Yassin on the social network

Twitter in support of the designated foreign terrorist organization the Islamic States of Iraq and the Levant (ISIL). These posts have included providing supportive information about ISIL. These posts have also included threats designed to solicit, induce or persuade a select group of Twitter followers to use, attempt to use or threaten physical force against United States' employees and military service personnel.

STATUTORY AUTHORITY

7. This affidavit is in support of a complaint alleging a violation of Title 18, United States Code, Section 875, relating to the use of interstate or foreign communications to communicate any threat to injure the person of another:

a. 18 U.S.C. § 875 prohibits transmitting in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

b. 18 U.S.C. § 2 prohibits aiding, abetting, counseling, commanding, inducing or procuring the commission of an offense against the United States.

BACKGROUND

8. On or about October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (AQI), then known as Jam 'at al Tawhid wa' al-Jahid, as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive order 13224. On or about May 15, 2014, the Secretary of State amended the designation of al-Qaeda in Iraq as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary of State also added the following aliases to the ISIL listing: The Islamic State of Iraq and al-Sham, The Islamic State of Iraq and Syria (ISIS), ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh,

Dawla al Islamiya, and Al-Furquan Establishment for Media Production. To date, ISIL remains a designated Foreign Terrorist Organization.

YASSIN ON SOCIAL MEDIA

9. The FBI first identified Yassin through a complaint call on January 30, 2015, to the FBI's Public Access Line (PAL) from a man/woman who had befriended Yassin on Facebook several years ago (hereinafter, "complainant"). The complainant stated that Yassin introduced him/her to Islam and that very early in their relationship Yassin was unexceptional in her teachings and that moderation made the complainant convert to Islam. According to the complainant, recently Yassin had become convinced that ISIL is going to save the world and Yassin was trying to rally support for ISIL. Yassin told the complainant that he/she would go to hell if he/she did not divorce his/her non-Muslim spouse and get rid of his/her dogs and all of his/her non-Muslim friends. Yassin also said to the complainant that he/she would go to hell for his/her beliefs in God. The complainant stated that while Yassin's beliefs are disturbing, Yassin has not directly advocated violence to the complainant. Yassin communicated with the complainant using Twitter handle @safyayassin77, Facebook account sofia.yassin7, and email address fungirl2003-sofia7777@yahoo.com. At the time of the interview, the complainant stated that Yassin lived in the area of Bolivar, Missouri.

10. Based on the information provided by the complainant and through searches of publicly available social media networks, the FBI was able to locate several social media accounts for Yassin. These accounts included a publicly available Facebook page with the user name safya.yassin.7 and a Twitter account with the handle @safya77. The Facebook page stated that the account holder worked at "disseminating information" as an "independent reporter." That page contained posts related to ISIL and several images containing what I recognize through my

experience to be a black flag that bears the Tawheed, (an Islamic tenet) which is a traditional Islamic symbol that is often used by ISIL. The Facebook page also contained images purporting to be Safya Yassin that appear to match the driver's license photo for Safya Yassin that I reviewed. The profile picture for the Twitter account was the same as the profile picture used on the Facebook account associated with Yassin. The Twitter account also contained posts related to ISIL. A review of the open source social media checks also disclosed a Google+ account for Safya Yassin that included photographs. The person in these photos also matched the same photos viewed in the safya.yassin.7 Facebook account. The Google+ account stated that Yassin was located in Springfield, Missouri.

11. Pursuant to ongoing federal investigative methods, information was obtained from Twitter in May 2015 that disclosed that the email address fungirl2003-sofia7777@yahoo.com was used to create Twitter account 3194653789. That email address is the same address provided by the complainant as one that he/she used to communicate with Yassin. The FBI subsequently identified several handles used by account 3194653789, including @_muslimah_0o01, @muslimah_o1o1o1, @muslimah_oo1b, and @MusLiMaH_0o01. Each handle had some variation of the word "muslimah" which I understand is an Arabic term for a Muslim woman.

12. On May 13, 2015, account 3194653789 stated "Please help share my account, this is my 3rd suspension in less than 48 hours. may Allah Reward you!!"

13. On or about May 29, 2015, that same account, using the handle @Mu5limah_o01 made Twitter posts referencing a "Freedom of Speech Rally Round II," which was scheduled to take place in Phoenix, Arizona, that night. The posts stated the following: "They are only getting bolder because no one was killed at their last event, but if it goes the other way ..." and "They

have courage now, but if a backpack was left at the scene w/nothing in it, you would have a stampede. lol.” I understand “lol” is an internet acronym for “laugh out loud.”

14. On June 4, 2015, FBI Special Agents Alan Peak and Patrick Thomas interviewed Yassin at her then residence in Bolivar, Missouri. During that interview, Yassin was shown screen shots of her social media posts, including screen shots from the Facebook and Twitter accounts associated with her, and acknowledged that she made those posts. She stated that she understood how her intentions might have been misunderstood. With respect to pictures of children with what appear to be ISIL flags, Yassin stated that the flags are traditional Islamic flags, the flag of Tawheed, that have been co-opted by ISIL. She stated that she posted the pictures with happy emoticons because she thought the children were cute, rather than to signal her support for ISIL. Yassin denied making threats to the complainant, stated she never made threats on social media, and said she does not endorse or encourage violence. She stated she is not pro-ISIL, does not intend to travel to Iraq or Syria, would never encourage anyone else to do so, and has never sent financial support to ISIL. She said she simply reports the news, and she advised she would be willing to answer any further questions.

15. Special Agent Alan Peak and another FBI employee interviewed the complainant again by phone on June 18, 2015. The complainant confirmed the information he/she provided in his/her original complaint call. He/She provided additional information about his/her contacts with Yassin, including that Yassin began talking about ISIL in 2014, and that Yassin told him/her that Yassin believes that she is seeing the end of times and wonders if ISIL is the end-times army described in Islamic prophecy. The complainant stated in his/her opinion that he/she did not think Yassin had the desire or means to travel to Iraq or Syria in support of ISIL, but that Yassin simply posted opinions on Twitter. The complainant stated that he/she told Yassin

several times to tone down her rhetoric on Twitter, but Yassin said she was doing nothing wrong and was not posting threats. The complainant also stated that he/she has difficulties with stress and wishes he/she had not called the FBI, noting that he/she did not believe that Yassin posed a danger. The complainant also stated that a day prior to this interview, after being contacted by the interviewing Agent to arrange the interview, the complainant contacted Yassin to inform her that his/her spouse wanted him/her to stop communicating with Yassin. The complainant further reported that earlier in the morning of the interview, Yassin sent the complainant an e-mail instructing the complainant to never contact Yassin again. Yassin explained that she knew the complainant was the one that “snitched” on her, and that Yassin was going to expose the complainant to Muslims everywhere.

16. Following the interviews mentioned above, the FBI began to observe and document what have been identified as Yassin’s various social media accounts and publicly available social media posts on a roughly daily basis. During these daily reviews, it was observed that Yassin’s Twitter handles were routinely changed throughout the day and Yassin’s Twitter accounts were eventually suspended by Twitter for breaches of Twitter’s terms of service. I have learned during this investigation that Twitter suspends accounts for violating terms of service, including social media support of ISIL. On February 5, 2016, Twitter posted the following message on its own blog: “We condemn the use of Twitter to promote terrorism and the Twitter Rules make it clear that this type of behavior, or any violent threat, is not permitted on our service. As the nature of the terrorist threat has changed, so has our ongoing work in this area. Since the middle of 2015 alone, we’ve suspended over 125,000 accounts for threatening or promoting terrorist acts, primarily related to ISIS.” As noted in paragraph 8 above, ISIS and ISIL are essentially synonymous terms to describe the same foreign terrorist organization.

17. Yassin acknowledged her understanding that Twitter suspends accounts for pro-ISIL postings in a series of publicly viewable posts on her Facebook page on June 23, 2015. Using the screen name Safya Yassin, a message stated the following: “Twitter suspends thousands of Muslim accounts in 48 hrs. Billions being spent to silence Muslims on Twitter, trolls trolling day and night. Theneveryone comes right back within 2 minutes. [smiley-faced emoticon with tongue out; smiley-faced emoticon laughing to tears].” A message was then posted on Yassin’s account that contained a headline from a British newspaper stating that “Twitter has suspended more than 30,000 of pro-ISIS accounts in the last 2 days.” The account also posted a message stating the following: “They’re very proud of themselves (that they had to run it on media) they really felt like they won some battle on the frontlines. Meanwhile, everyone is back within a few minutes. Honestly, this increases Twitters ‘worth’ temporarily, because it shows an increased number of new users.”¹

18. When Yassin’s accounts were observed by FBI employees as suspended, FBI employees performed open source searches for variations of Yassin’s previous Twitter user name and Twitter handles (e.g. Muslimah, e.g. @0001Muslimah) and reviewed Twitter accounts previously observed to be following or followed by Yassin’s past Twitter accounts. In addition, FBI employees noted that, until recently, all of these similar Twitter usernames always utilized

¹ For example, on or about July 29, 2015, Twitter account 3276959443, with the name Muslimah and the handle @Muslimah_01_, stated the following: “I am back...yet again!! They can't suspend the truth or Islam.” That account followed this tweet with an image of a blue “Twitter bird” wearing a black baseball cap and black shirt, each with the Tawheed symbol used by ISIL, carrying a black Tawheed flag used by ISIL. On the same day, the same account, name and handle stated the following: “. . .And the Caravan Keeps Marching Forward.” That post also contained an image of three all-black camels in a caravan, two of the camels have the Tawheed symbol used by ISIL on the side, and dogs with the flags of Turkey, the United States and Israel barking at the legs of the lead camel. I know through training, experience and discussions with others in this investigation that the symbol of a caravan is historically significant in Islam and indicates spreading the faith.

the same profile picture of a green-colored “Twitter” bird, the banner picture of a “Dabiq” road sign, and a variation of the “muslimah” name and handle (e.g., Muslimah, e.g. @oooolMuslimah). In addition, these Twitter accounts have at times followed Twitter pages associated with television news channels located in Kansas City, MO and Springfield, MO.

19. As of January 27, 2016, the FBI had identified the following 97 Twitter account IDs as likely being used by Yassin to post content in support of ISIL, most of which used the Twitter name Muslimah or some variation of it:

4444938262, 4539600252, 3124516890, 3194653789, 3197125238, 3252950068, 3267010776, 3270443618, 3276959443, 3305479182, 3306617348, 3308574662, 3320681954, 3344340743, 3365154664, 3395341992, 3402645673, 3418887626, 3423233658, 3430412711, 3433139709, 3433842111, 3433967914, 3434761864, 3434811491, 3435104614, 3435208083, 3437697797, 3441860112, 3442088832, 3472329339, 3472476256, 3487933456, 3515388461, 3526083742, 3526806435, 3538833621, 3539030117, 3929436857, 3939991635, 4039887798, 4039904538, 4039982479, 4040026034, 4056433877, 4122469985, 4139414834, 4139436014, 4203660495, 4203685215, 4212512465, 4271193980, 4277720907, 4277793497, 4282245141, 4282387456, 4344774977, 4347753387, 4347892456, 4396216961, 4425181812, 4428347484, 4433326474, 4443605715, 4513434374, 4697726119, 4461326067, 4540438053, 4584049103, 4657707981, 4710798813, 4710967702, 4584148397, 4444798277, 4693051747, 4516267719, 4461376695, 4397886136, 4583947529, 4693015573, 4657773340, 4657654535, 4461471076, 4516201187, 4711075937, 4710979101, 4710940895, 4705768040, 4739554474, 4739545397, 4739594367, 4726069549, 4739385197, 4739699837, 4776285612, 4822925854, 4770213501

20. Based upon my knowledge, experience, analysis, and observations as well as that of others assigned to the JTTF, I believe the evidence establishes that the accounts using the name Muslimah and its variants are used by the same person and that person is Yassin. Those accounts show postings similar to those used by ISIL. The postings from these accounts consistently and similarly promote ISIL’s message of violent Jihad.

21. On or about July 7, 2015, Twitter account 3270443618, with the name Muslimah and the handle @_Mu5liMah1, stated the following: “As Salaam Alakum~ Account just got suspended.

Please Follow & Share me again! Jazak'Allah Khair.” The post was followed by two smiley-faced emoticons with pink cheeks. This post was made contemporaneous with one account associated with Yassin going down and this new account coming up.

22. On or about July 14, 2015, Twitter account 3270443618, with the name Muslimah and the handle @_Muslimah1_, stated the following: “@TawheedNetwork How much time do you get for just ‘wanting’ to travel to Syria?”

23. On or about July 17, 2015, Twitter account 3270443618, with the name Muslimah and the handle @_Muslimah1_, stated the following: “2 of the Marines identified. Both participated in slaughtering Muslim babies #ChattanoogaShooting.” The tweet included the pictures of two men in United States military uniforms.

24. On or about July 18, 2015, Twitter account 3270443618, with the name Muslimah and the handle @_Muslimah1_, stated that “Americans aren’t even smart enough to know where to cut on a neck,” which was followed by a picture of a torso and neck with a superimposed dotted-line around the base of the neck with the superimposed words “cut here.” Below the dotted line, written on the torso is a superimposed word in Arabic. Those directly involved in this investigation recognized the Arabic word to be the spelling of the word “kuffar,” which means non-Muslim.

25. On or about July 29, 2015, Twitter account 3276959443, with the name Muslimah and the handle @_Muslimah_01, posted a photo along with the text “#Soon.” The photo is an altered version of a popular photo. The original photo comes from the film “North By Northwest” and depicted Cary Grant running in a field from an airplane. The version in the tweet had replaced Cary Grant’s face with President Obama’s face and had replaced the airplane with a military drone. As altered, the image depicts President Obama running from a drone

strike. Another user commented on that post “lol Qariban qariban bi indnilah.” I understand “lol” to mean laugh out loud, and have been advised with those familiar with Arabic that the remainder of the post translates as “soon, soon, God willing.” In response, Yassin’s Twitter account 3276959443 posted “Yes indeed, I am in that mood. :))”

26. On or about August 3, 2015, Twitter account 3197125238, with the name Muslimah and the handle @Muslimah1__, tweeted, “I’m Back Again!! [smiley-faced emoticon].” Below this tweet, the same account posted an image of a blue bird with its head partially covered in a black hood, wearing a black cape with the Tawheed symbol used by ISIL. The blue bird has the same symbol on its chest, an unknown type of weapon on its back, and a belt that appears to have two grenade-like canisters attached. Directly above the bird is a speech bubble with what appears to be Arabic writing and the words, “I’m Back!” The same day the same account and handle stated the following: “[t]his is me making new accounts! [smiley-faced emoticon]” Below this tweet, that account posted an image of a black bird typing on a laptop computer. The caption of the image was “twitter” followed by the Twitter bird image bearing the Tawheed symbol that is used by ISIL.

27. On or about August 5, 2015, Twitter account 3197125238, with the name Muslimah and the handle @Muslimah_001, made a series of posts stating the following:

The West thinks that caging Muslims will stop “terrorism”...but they will be finding out soon, it only increases the attacks against them.

* * *

“Islamic State Supporter” means supporter of Islam.
“Radical extremist” means adheres exclusively to Islam.
“Terrorist” means fight 4 Islam.

* * *

Media: “What radicalizes some Muslims?”

Let me show you just a few:

[four images: a man in a cage; a person in traditional Middle Eastern clothing and head cover holding a small child and sitting behind razor wire; a city with several fires; what appear to be a dead child]

You all just going to sit around and watch
them take you down one by one, kill you,
take your kids or you going to do
something?

* * *

Anjem Choudary and Abu Baraa have been charged on terrorism charges and support of IS. Please Make Dua. May Allah Protect them! Ameen!

As of August 6, 2015, the Twitter account believed to be used at that time by Yassin was following the Twitter account then associated with Anjem Choudary. I know through open sources that Choudary was the head of a United Kingdom designated terrorism organization.

28. On or about August 6, 2015, Twitter account 3197125238, with the name Muslimah and the handle @Muslimah__001, retweeted the following that was posted by another Twitter user: “a sincere request from our Muslimah: “The Ummah needs men of action not hashtags.”

29. On or about August 11, 2015, Twitter account 3197125238, with the name Muslimah and the handle @muslimah__1, stated the following: “ISIS leak HACKERS GUIDE to hundreds of US military personnel shr.gs/gY8Rx4K.” The FBI was not able to recover the linked item since it had been removed. I have knowledge that agents involved in this investigation have reviewed open-source news coverage that showed the original tweet from the Twitter handle @ISHacking_Div. The articles stated that the link contained photographs, addresses, other contact information, and even credit card information of United States Army, Navy and State Department employees.

30. On or about August 12, 2015, Twitter account 3197125238, with the name Muslimah and the handle @muslimah__1, stated the following:

“ISIS Allegedly Leaks US military names/addresses”
Doesn't look “allegedly” to me.

The post is accompanied by an image that contains eight photographs of individuals that appear to be United States service members. It appears that the user of this account may have made this image herself from the original image at the link referenced in the prior paragraph. Each photo is placed beside a name and contact information for the person depicted.

31. On or about August 12, 2015, Yassin used Twitter account 3197125238, with the name Muslimah and the handle @Muslimah__1, to state “Nice Try” along with a posting from Twitter that states “Add your birthday to you profile . . . Let people know when the big day arrives.” Another Twitter user tweeted to the @Muslimah__1 handle, “‘The big day’ Looks like the kuffar are going to raid you.” In response, @Muslimah__1 posted the following: “Anyone ‘raiding’ me will be shot on site.” The FBI employee who observed this posting also noted that on August 13, 2015, this tweet was no longer available and was likely removed from the feed by the user of @Muslimah__1.

32. On or about August 12, 2015, Twitter account 3197125238, with the name Muslimah and the handle @_M01_, stated the following:

BLOCK THIS --->>
@ISHackingDiv_4

Fake account. Kuffar dying
In their rage, all they can
do is open fake accounts &
report accounts. Losers.

33. On or about August 13, 2015, Twitter account 3197125238, with the name Muslimah and the handle @__M01__, stated the following: “The filthy Kafira Pig Faced [first and last name of

person A] is using all my tweets for her stories”; “She would be better off without her head”; “Hey [first name of person A], hope your face hits the floor first when you lose your head”; and “She would be better off without her head.” I know from news reports that [first and last name of person A] is a media personality that was associated with a Mohamad drawing event in Texas, where two ISIL-inspired men attacked people at an event with firearms and were then shot and killed by a police officer.

34. On August 19, 2015, Twitter account 3308574662, with the name Muslimah and the handle @1__Muslimah_, retweeted the following statement and link from another Twitter user:

#UPDATE
Caliphate soldiers leak the information of American army
justpaste.it/cyberisisis

That post is accompanied by an image of a computer keyboard with some Arabic writing and the phrase “ISIS Electronic Army” over it. The justpaste.it link provided in the above re-tweet by @1__Muslimah_ links to a justpaste.it page that appears to list the town of residence and phone number for approximately 150 United States Air Force personnel. The link also contains Arabic text that is translated as follows:

In the name of God, and peace and blessings be upon the messenger of His mercy and the epic, he who is happy [in times of peace] and grim [in times of war]. Muhammad Bin-Abdallah.

This information was seized from American [web] sites belonging to the American Crusader army by a hacker of the Islamic State, may God grant it strength and support it through victory. Rejoice, O supporters of the Caliphate State, with the dissemination of the information to be delivered to lone wolves.

God said: “And slay them wherever you may come upon them,” [partial Koranic verse, Al-Baqarah, 2:191].

I understand this text to solicit violence on behalf of ISIL against the listed Air Force personnel by “lone wolves,” that is, individual actors inspired to violence by ISIL. Through open-source

reporting, I understand that this list had been previously posted by other users associated with ISIL on or about August 11, 2015.

35. The FBI is aware that 3308574662 was not the only ISIL supporter to post the link to this list. As a direct result of ISIL and its supporters posting this list, United States Air Force members were threatened with death. For example, on August, 18, 2015, a day before 3308574662 posted the list, United States Air Force Major [Actual First and Last Name-0], currently stationed at [Actual Location], received two phone calls from an unknown individual threatening to kill both Major [Actual Last Name-0] and his family. The caller specifically threatened Major [Actual Last Name-0] and his family with beheading, shooting, and bombing if he did not comply with the caller's demands to stop working for the Air Force within 72 hours. Major [Actual Last Name-0] had previously been notified by United States Air Force Office of Special Investigations (AFOSI) that his name and personally identifiable information had been published by ISIL. [Actual Last Name-0] believed the caller was related to the ISIL internet posting because the caller asked if he lived in Destin, Florida, which is where he was previously stationed and is the location for him on the ISIL list. [Actual Last Name-0] expressed his desire that prosecution be pursued against the caller and perceived the anonymous caller to be a true threat.

36. On or about August 19, 2015, a Twitter account using the name Mujahid electronic and the Twitter handle @cyberiskhalifah tweeted to Twitter handle @1__Muslimah, "we are back hhhhhh." That post was accompanied by an image of an individual in a gray hoodie with a laptop, and included ISIL symbols located behind the individual with the banner on the image reading, "We are the hackers of the Islamic State." Just a few minutes later, Twitter account 3308574662, with the name Muslimah and the handle @1__Muslimah, stated the following:

Must Follow & Share [smiley-faced emoticon]

@cyberiskhalifah
@cyberiskhalifah
@cyberiskhalifah

The Twitter account Mujahid electronic @cyberiskhalifah then responded, “@1_Muslimah thank you brother.”

37. On or about August 24, 2015, Twitter account 3433967914, with the name Muslimah and the handle @OOO1Muslimah, retweeted the following three verbatim tweets from Twitter user Mujahid electronic @ccybercaliphate:

Mujahid electronic @ccybercaliphate
List the names of the pilots Americans
justpaste.it/cyberisisis
Publishing Publishing
ElHimma yaansar the Caliphate

[Image of an individual in a gray hoodie with a laptop, and included ISIL symbols located behind the individual with the banner on the image reading, “We are the hackers of the Islamic State.”]

* * *

Mujahid electronic @ccybercaliphate
Full Name: [Actual First Name and Last Name-1]
Department: US Army - SWA Kuwait
City / State: Kuwait
Phone / Cell: [actual cell]

* * *

Mujahid electronic @ccybercaliphate
Wanted to kill
Full Name: [Actual First Name and Last Name-2]
Department: FBI
City / State: MIAMI
Zip Code: 33169
Phone / Cell: [actual cell]

Wanted to kill
Full Name: [Actual First Name and Last Name-3]

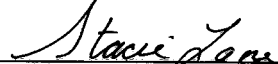
Department: FBI
City / State: Quantico
Zip Code: 22135
Phone / Cell: [actual cell]

38. I am aware that [Actual First Name and Last Name-2] and [Actual First Name and Last Name-3] are employees of the FBI. Both [Actual Last Name-2] and [Actual Last Name-3] were notified of the threats. From reviewing FBI documentation, I am aware that [Actual Last Name-2] received assistance from the FBI with increasing his/her residential security and protecting his/her personal information. I am also aware that [Actual Last Name-3] met with law enforcement to increase his/her residential security in response to the threat.

39. At all relevant times, Twitter, Inc., maintained a social media service called Twitter. All posts made by Twitter users are transmitted from the user's location to the company's servers in California.

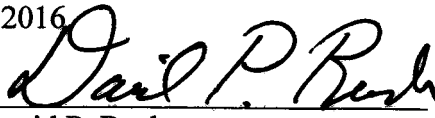
CONCLUSION

40. Based on the above facts, I believe probable cause exists for the issuance of a complaint charging Yassin with violating 18 U.S.C. §§ 875(c) and 2 for transmitting and aiding and abetting the transmission of a threat in interstate commerce to injure the person or another on or about August 24, 2015.



Stacie Lane, Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me this th 17 day of February, 2016



David P. Rush
United States Magistrate Judge
Western District of Missouri