

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Idaho

United States of America

v.

ALEXANDER SCOTT MERCURIO,

Defendant(s)

Case No.

2:24-mj-00091-DKG

CRIMINAL COMPLAINT

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

On or about the date(s) of April 6, 2024 in the county of in the District of Idaho, the defendant(s) violated:

Code Section

18 U.S.C. § 2339B

Offense Description

PROVIDING MATERIAL SUPPORT OR RESOURCES TO DESIGNATED FOREIGN TERRORIST ORGANIZATION

This criminal complaint is based on these facts:

See attached Affidavit in Support of a Probable Cause Arrest.

Continued on the attached sheet.

Complainant's signature

John H. Taylor II, FBI Task Force Officer

Printed name and title

Sworn to before me telephonically and signed electronically via teleconference with the identity of the Complainant vouched for by Assistant United States Attorney David G. Robins in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 04/08/2024

City and state: Boise, ID

Judge's signature

Hon. Debora K. Grasham, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Task Force Officer John H. Taylor, II, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Deputy US Marshal and Task Force Officer for the Federal Bureau of Investigation. I make this affidavit in support of a criminal complaint charging Alexander Scott Mercurio (hereafter referred to as “MERCURIO”) with a violation of 18 U.S.C. § 2339B (attempting to provide material support or resources to a designated foreign terrorist organization). Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe MERCURIO has knowingly attempted to provide material support and resources to a foreign terrorist organization, to wit: the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist organization and that ISIS had engaged in and was engaging in terrorist activity and terrorism.

AGENT BACKGROUND

2. I am a full time Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), and have been assigned to my current position since September 2021. I am currently assigned to the FBI’s Salt Lake City Division, Boise Idaho Resident Agency’s Joint Terrorism Task Force (JTTF). Additionally, I have been a certified commissioned peace officer in the States of Idaho or California for sixteen (16) years, two of those years included time as a TFO on another JTTF. I have investigated numerous state and federal violations including international and

domestic terrorism, drug trafficking, gang and organized crime activities such as racketeering and the like, violent crimes, and fugitives. I have conducted physical surveillance, interviewed subjects and witnesses, debriefed confidential human sources, executed authorized search warrants, and used other investigative techniques to secure relevant information. Based on this experience, I have become knowledgeable in regard to the methods and modes utilized by persons who are engaging in a wide variety of criminal activity that constitutes violations of federal laws. As a Task Force Officer, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. The information in this affidavit is based upon my training and experience, my personal knowledge of this investigation, and information provided to me by other agents and law enforcement officials who have assisted in this investigation and have experience investigating terrorism-related crimes. This affidavit is intended to provide probable cause to support the issuance of a search warrant and does not set forth all of the information that I have acquired during the course of this investigation. Where statements of others are set forth in this affidavit, they are set forth in substance and in part. Foreign language statements are set forth based on translations by FBI language specialists, which are subject to further review or refinement.

APPLICABLE STATUTES

4. Title 18, United States Code, Section 2339B provides for criminal penalties for anyone who “knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so.” For purposes of Section 2339B, “material support or resources is defined as:

any property, tangible, or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safe-houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individual who may be or include oneself), and transportation, except medicine or religious materials.”

18 U.S.C. § 2339A(b)(1).

SUMMARY OF PROBABLE CAUSE

5. This case began when MERCURIO reached out to confidential human sources online and indicated his support for ISIS and terrorist organizations, more generally. The FBI was able to work with a confidential human source (CHS) who met with MERCURIO in person. MERCURIO proceeded to express support for terrorist organizations, specifically ISIS, online and in-person. MERCURIO spread ISIS propaganda online and solicited ISIS’s involvement in and approval of his propaganda efforts, discussed travelling from the United States to join ISIS, considered and planned ways to support ISIS financially, and most recently, set forth on a plan to assault his father with a metal pipe, acquire his father’s firearms, and attack a local church.

6. At the beginning of 2024, his conduct escalated to MERCURIO planning to carry out a suicide attack on a church(es) in Coeur d’Alene, Idaho. His attack plan involved using flame-covered weapons, explosives, knives, a machete, a pipe, and ultimately firearms. His plan grew more precise as he eventually identified the specific church and date on which he planned to attack. MERCURIO planned to attack the church on April 7, 2024, a date intentionally selected by him so his attack would occur before the end of Ramadan. As the date drew near, MERCURIO devised

a plan to incapacitate his father, restrain him using handcuffs, and steal his firearms to use for maximum casualties in his attack.

7. MERCURIO purchased items consistent with his planned attack; this included butane canisters and a metal pipe. In planning the attack, MERCURIO made a ba'yah statement, pledging his allegiance to ISIS and stating his intention to die while killing others on behalf of ISIS. MERCURIO transmitted that statement on April 6, 2024, consistent with a prior representation where he claimed he would transmit the statement a day or so prior to the attack. He planned the attack for April 7, 2024. Law enforcement thwarted MERCURIO's plans before, according to MERCURIO's timeline, he could harm his father and acquire firearms. Law enforcement executed a search warrant on his house and upon his person. At MERCURIO's house, law enforcement found items consistent with his planned attack (butane canisters, lighters, a pair of handcuffs, a knife, a pipe, and a machete). Law enforcement also found several firearms in MERCURIO's father's possession, stored as MERCURIO represented in his plans. Also, law enforcement found an ISIS flag in MERCURIO's bedroom.

PROBABLE CAUSE

Islamic State of Iraq and al-Sham (ISIS) is a Designated Foreign Terrorist Organizations

8. On October 15, 2004, the U.S. Department of State designated Al-Qaida in Iraq (AQI) as a foreign terrorist organization (FTO) 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 May 15, 2014, the U.S. Department of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act as a Specially Designated Global 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 U.S. State Department also added the following aliases for ISIL: the Islamic State of Iraq and al-Sham (ISIS), ad-Dawla al-Islamiyya fi al-‘Iraq wa-ash-Sham, Dawla al Islamiya and Al-Furquan Establishment for Media Production. In an audio recording publicly released on or around June 29, 2014, ISIL announced a formal change of its name to the Islamic State. To date, ISIS remains a designated FTO.

Initiation of Investigation of ISIS Facilitators

9. In 2021, the FBI was conducting a criminal investigation into a fundraising network that uses cryptocurrency exchanges and other financial services platforms to raise funds and launder money to support designated foreign terrorist organizations based in Syria, including but not limited to ISIS and its Afghanistan-based affiliate, ISIS Wilayat Khorasan (“ISIS-K”). It was during the course of this investigation that the FBI became aware of MERCURIO, among others, including a known individual (hereafter referred to as “individual-1”). The investigations revealed that individual-1 and three others collected and provided funds and other forms of financial support to ISIS through transactions executed across a variety of different cryptocurrency exchanges and financial services platforms. Another known individual, (hereafter referred to as “individual-2”), known to have resided in Gaza, was the ultimate recipient of the funds collected by individual-1 and the others.

10. The investigation revealed that individual-1 and individual-2, as well as other members, or former members, of several group chats (“Group Chat-1”) communicated on an encrypted social media and mobile messaging electronic communication service (hereinafter “ECS”) to gather support for ISIS and obtain monetary donations through Bitcoin. Individual-2 is believed to have died.

Identification of MERCURIO using Username “Polnoyedinstvo”

11. Prior to July 2022, individual-2 operated in the ECS using his unique account and display name. After individual-2 suddenly deleted his ECS account around July 2022, a confidential human source-1 (CHS-1) adopted a new ECS profile with the same display name as previously used by individual-2. On or about July 15, 2022, an individual with the username “Polnoyedinstvo” on the ECS, direct messaged the account operated by CHS-1. Polnoyedinstvo wrote, *“Asalamulaikum wa Rahmatullahi wa Barakatuhu. I hope you are okay my brother. When I woke up, it displayed your account as deleted, so I was worried. But it appears to have just been a glitch...May Allah protect and preserve you and our brothers and sisters, keep us steadfast, forgive us of our sins, suffice us in all affairs, keep us sincere, free the prisoners, grant victory to the soldiers, and accept our worship and deeds.”* As discussed below, I believe that MERCURIO uses the Polnoyedinstvo account. I also believe that when MERCURIO was communicating with the account operated by CHS-1, he believed he was communicating with this particular account used by individual-2, not CHS-1.¹

12. A review of Twitter Account, @polnoyedinstvo_ (https://twitter.com/polnoyedinstvo_), showed this profile shared the same friends and profile picture as the ECS user’s Polnoyedinstvo profile. In August 2022, information obtained from Twitter, revealed the IP addresses used by the user of @polnoyedinstvo_. The IP addresses resolved to certain internet service providers.

¹ This contact on or about July 15, 2022 was CHS-1’s only contact with MERCURIO where CHS-1 used an account consistent with individual-2’s prior display name. For each future contact between CHS-1 and MERCURIO referenced in this Affidavit, CHS-1 used a separate account to communicate with no affiliation to individual-2.

13. Information obtained from one of those service providers identified MERCURIO's father as the account holder. MERCURIO lived with his father.

14. The investigation revealed that MERCURIO was an online-student at a local school and was issued a laptop and Wi-Fi hotspot (which is a device by which digital devices can connect to the internet). I submit that MERCURIO is the user of the Polnoyedinstvo ECS account. I submit this based on corroborating/overlapping facts acquired in this investigation and the personal information posted by Polnoyedinstvo on ECS "Group Chat-1" or within direct messages with various users on the ECS. The following are such examples.

15. On or about October 2, 2022, Polnoyedinstvo stated on Group Chat-1:

"I'm 17 in USA [this marches MERCURIO's age at the time]" ... "I know I try to keep secret, I'm in north Idaho very Christian and conservative parents are mad cause I'm not shaving beard and not letting pants go below ankle."

16. On or about October 2, 2022, one user on Group Chat-1 posted:

"Plus looking at your profile name your parents probably come from Soviet countries." Polnoyedinstvo responded, "Mother comes from russia yes but father is american." [the investigation has revealed that MERCURIO's mother is of Russian descent].

17. On or about October 6, 2022, Polnoyedinstvo stated on Group Chat-1:

"very good news using school hotspot wifi apparently it lets TG connect so im not gone forever alhamdulillah although phone is still gone so if any brothers had a secret chat with me you have to use normal chat because im running a portable TG client atm".²

18. On or about October 10, 2022, a user in Group Chat-1 posted a screenshot of an email the user received from Polnoyedinstvo, in which Polnoyedinstvo stated:

² Based on my experience, "TG" likely means Telegram, an ECS.

“Ok brother it was calm for a couple days, now its serious. Theyre sending me to in person school again, more therapy more stuff like that etc etc, probably not coming back anytime soon. Obviously make dua, tell brothers, etc. Im in for the long haul. I gotta keep my Iman firm, no matter what. They may even send me to a “youth program” (ship me off hundreds of miles to force me to “behave”) etc etc. Kinda scared but In Sha Allah everything will be okay, goodbye brother.”

19. On or about October 13, 2022, a user in Group Chat-1 posted a screenshot of an email the user received from Polnoyedinstvo, in which Polnoyedinstvo stated:

“Brother please I don’t like asking this but please tell all brothers in GC to make dua for me, my parents want me to stop being muslim and praying and drop everything 100 percent tomorrow or they take away absolutely everything and send me to in-person school to make sure I don’t pray or if that doesnt work send me to youth camp or juvenile hall or something IDK please I just dont know what to do, this will probably be my last message in a long while...”

20. On or about October 13, 2022, a user in Group Chat-1 posted a screenshot of an email the user received from Polnoyedinstvo, in which Polnoyedinstvo stated:

“Also can you find the fiqh opinions regarding the trimming of the beard and allowing pants to go below ankles and other acts like that which constitute imitating k-ffar in a land of dar al harb, because Im in a position where I will have to keep pants below ankles and trim my beard or there will be a punishment.”

21. Through either direct messages or Group Chat messages, MERCURIO was only ever observed using one ECS account which was originally observed with the display name “Polnoyedinstvo.” Over the course of investigation, MERCURIO changed his username and display name numerous times. The User ID, which cannot be altered by a user, was observed for each of the below communications where MERCURIO documents

his intent to provide financial or other support to ISIS, and later his intent to conduct an attack and become a martyr for ISIS.

A Review of MERCURIO's School Computer Indicated Support for Terrorism

22. In March 2023, the FBI obtained copies of electronic files from MERCURIO's school-issued laptop, email, and other electronic devices. On his issued laptop, files related to his education were found, but also were numerous files confirming MERCURIO's commitment to ISIS and its ideology. The files included but were not limited to a photograph of MERCURIO wearing a black balaclava (head wrap) and holding up the number one finger (a gesture commonly used by ISIS supporters), numerous documents concerning socialism, communism, and politics, as well as more direct support to ISIS or radical ideology. For example, "Heroes - Mass Murder and Suicide" written by Franco 'BIFO' Berardi was found which covers the Aurora "Joker" killer, Anders Breivik, American school massacres, the suicide epidemic in Japan and Korea, and austerity suicides in Europe. One audio chant called, "Answer the Call" in English appeared to be a call to the Islamic State and martyrdom. Two files were in German. The first's title translated to "For his sake." This file was a Jihadi chant, which called for vengeance and blood and speaking of the inexorable advance of the black flag. Gunfire and shouting are audible towards the end of the recording. A second audio file titled "Haya" was initially wordless and then evolved into a Jihadi chant similar to the chant in the first file. The file also contains sounds of artillery fire, shouting, and cries of "Allahu Akbar" [God is great]."

23. From MERCURIO's electronic files, the FBI also found and translated over 50 files in Arabic, French, and Russian, which were primarily audio files of chants and songs. In summary, these songs and chants glorified the Islamic State, and celebrated the conquests of the Islamic

State. The chants spoke of Jihad and martyrdom in the sake of Allah, about the war by the Islamic State against the tyrants, and about restoring the glorious days of the Islamic State by its men. The chants glorified the unity and brotherhood of the Islamic State fighters against the enemy. The chants referenced the Islamic State's conquests against the infidels, and not bowing down to them. The songs were about being steadfast in performing Jihad. The chants mentioned the heroism of the Islamic State fighters in the battlefields against the enemies. There was a reference to performing Jihad in the land of the two rivers. The chants exalted the Islamic State and the new dawn brought by its knights. The chants celebrate the glory of the Islamic State and embrace paradise. The chants also indicate how the Islamic State fighters are willing to offer their souls and money in the sake of Jihad. One Russian song specifically discussed the violent murder of non-believers and the return of the Caucasus and the Urals, as well as the capture of the Crimea. Of note, FBI research showed the lyrics of this song were the same as a song originally published on November 12, 2015 by the Islamic State on Al-Hayat Media Center.

MERCURIO's Support of ISIS Ideology and Communications with ISIS Members

24. Prior to his arrest, individual-1 was operating on the ECS with the display name "Taliban Exposed." Shortly after individual-1's arrest, on or about December 18, 2022, a member of Group Chat-1 asked the group "Where is Taliban exposed, it's been a few days no post does anyone know if he is ok." MERCURIO responded using his ECS account:

"I may have an idea but be aware this is speculative and Allah knows best about his condition. Also please keep this secret, I expect everyone in this chat not to discuss the details in public. I have known Taliban Exposed for a couple of years now, before he made that twitter account. I knew him by his archive.org page, "blackflagsofkhurasan," henceforth I will call him "Khurasani". He is the first munasir I ever spoke with, he helped guide me to the

haqq. He has been involved with a lot of good work for a long time. However, he has faced some issues recently. Before I disappeared in October, I messaged him about a couple of things. One thing he told me was that he was being investigated by the FBI (he got an email from google saying they let the FBI look at his account). Of course, he still had time to do things, mind you he lives in Canada (Toronto, to be specific). He said it was probably because of his donations. A few days ago, a brother here posted an article about some IS supporters in America and one in the province of Ontario, Canada (remember, Toronto is in Ontario) got arrested for financial support. Since then, I didn't see him come online or post anything. My theory is that this might actually be him, HOWEVER I cannot confirm. Maybe he's just really busy and he'll be back in a while, but just in case something did happen, that's my two cents. So, lets all pray for our beloved brother, he needs all the help he can get, no matter how good or bad his situation is. He has done so much good work, losing him would be terrible. [actual link sent, but omitted here]. I'm referring to this article in specific."

25. On or about October 16 and 17, 2023, MERCURIO shared his feelings with CHS-1 about his self-discipline and his laziness in prayer, or other aspects of Islam. MERCURIO sent the following in response to prior messaging from CHS-1:

"I thought about what you said, and to answer your question: My ideal self would be someone who is fulfilling all of his religious obligations to the best of his ability; someone who is always striving for the sake of Allah however he can, whether that is with the pen, the mouse, the sword, or the paycheck; someone who is knowledgeable enough to always be able to distinguish between right and wrong, good and evil, permissible and forbidden; someone who is always ready to fight and give up everything for the sake of Allah at a moments notice; someone who upholds proper Islamic values, etiquette, creed, beliefs, and character; someone who is utterly sincere and steadfast in their religion regardless of the circumstances, never throwing the religion behind their back. My physical jihad without constraints would either be fighting on the frontlines or fighting on enemy soil, to kill and be killed."

MERCURIO Had an In-Person Meeting with a Second CHS

26. In addition to the chats above, MERCURIO had in-person meetings with a confidential human source. On or about February 16 and 17, 2024, MERCURIO met with CHS-2 in Coeur d'Alene, Idaho. CHS-2 is a confidential human source, whose information has proven reliable and is corroborated by other evidence. On February 16, 2024, FBI personnel observed MERCURIO as a passenger of a blue sedan with Idaho registration. The vehicle was possibly driven by his father and travelled from their residence to MERCURIO's known place of employment ("Employment-1") in Hayden, Idaho. His place of employment is known by name, but omitted here.

27. Later on the same date, CHS-2 entered Employment-1 and was noticed by MERCURIO, who greeted CHS-2 in Arabic. During the subsequent conversation, CHS-2 asked MERCURIO if he would be willing to have lunch together, and MERCURIO advised that he was very sheltered and did not go out much. MERCURIO also advised that his parents were not fond of his deen.³ MERCURIO asked CHS-2 for his contact information and provided CHS-2 with his ECS username. CHS-2 and MERCURIO exchanged pleasantries and CHS-2 left. CHS-2 was contacted by MERCURIO later in the evening and extended an invitation to CHS-2 to meet up the following day.

28. On February 17, 2024, CHS-2 picked up MERCURIO from a Park, Coeur d'Alene, ID. MERCURIO told CHS-2 that his deen was from Dawlah⁴ and that it started during COVID

³ "Deen" is Islamic terminology that translates to "the path" and refers to the practices and beliefs of Muslims to include customs or a way of life.

⁴ Although Dawlah directly translates to 'the state' in Arabic, based on my training and experience MERCURIO uses 'Dawlah' interchangeably with ISIS. Years ago, ISIS called itself ad-Dawlah al-Islamiyah fi I-Iraw wa-sh-Sham, which was later shortened to Dawlah.

while schools had been closed. MERCURIO advised that when he had first found Dawlah, he [MERCURIO] met a subject online [individual-1] from Canada.

29. MERCURIO revealed to CHS-2 that his parents were not happy about his deen and MERCURIO had to hide it from them. MERCURIO told CHS-2 that he knows he is compromising his religion in order to avoid conflict with his parents. MERCURIO told CHS-2 that he had previously “drank the Kool-aid” of white supremacy, but after finding Dawlah, MERCURIO felt there was more purpose for him.

30. On February 17, 2024, CHS-2 dropped MERCURIO off at the same location they met. After this point, CHS-2 continued contact with MERCURIO through ECS direct messages. MERCURIO used the same ECS account as previously discussed herein and sent CHS-2 multiple ISIS-related links.

31. On or about December 21, 2023, MERCURIO revealed to CHS-1 via direct messaging that he has been sinning again and tells CHS-1 that he is upset with himself. MERCURIO stated,

“...I've stopped asking and praying for martyrdom because I don't feel like I want to fight and die for the sake of Allah, I just want to die and have all my problems go away...”

32. MERCURIO told CHS-1 that he does not know what to do from this point.

33. On or about January 14, 2024, MERCURIO made the following statement to CHS-1 through direct message:

“I know. I mean, I always consider myself at least a partial hypocrite. I COULD go outside right now and stab someone with a knife or steal my father's weapons and get shahadah but I haven't...”

*"...Is not the saying "there is no life without Jihad" true?" "I pray that Allah *forces* us to die exclusively as Muslims, not even a chance of kufr, even though saying that is uhhh... rude? I don't think it's proper, but either way I just don't to ever die on shirk or kufr."*

34. On or about February 10, 2024, MERCURIO sent the following message(s) to CHS-1 through direct messages advising him of his current state:

"To answer your question: I am not doing well (as usual) for many reasons. 1. I am a hypocrite who has not even spat in the face of a kafir or donated a single penny in the cause of Allah, let alone spilled their blood and induced terror into their hearts and minds. I have the tools to do so, but I still waver because I am attached to the worldly life. I always say that I will wait for a better time to do so, to plan out a most splendid attack - but I doubt I really mean this. Perhaps it is a sign of insincerity that I prefer to carry out a successful attack to perhaps gain fame and notoriety (i.e. the shirk of riyya), or that I fear the blame of the blamers and hate for them to slander me in the media, and call me a mentally ill psycho who did this out of desperation and delusion and not as an act of religiously motivated terrorism. 2. I persist in sin and have slipped further into evil with each passing day. I can barely motivate myself to perform both the morning and evening adhkar, and I sin more frequently and with less shame. I have desensitized myself to my own evil. I also cannot fully escape all of the evil around me. 3. I am completely unmotivated to do anything. I do the bare minimum at work and school, I haven't tried waging media jihad, and the only thing I do is work and indulge myself time wasting activities like indulging in entertainment and shallow play. There is probably more I can think of, but I can't remember everything right now, and you have already hear a lot of this before..."

35. On or about March 20, 2024, MERCURIO sent CHS-2 a direct message advising that he would like to buy something for CHS-2 as a form of sadaqah (charity). MERCURIO advised that his father watches his [MERCURIO's] finances so he cannot properly "*donate to the Mujahideen.*"

MERCURIO's Creation and Distribution of ISIS Propaganda

36. On or about January 29, 2023, MERCURIO created "Group Chat-3" on the same ECS that he intended to be used as a repository for ISIS propaganda. CHS-1 was invited by MERCURIO to join the group and noted that the private group was created on January 26, 2023 and MERCURIO had uploaded numerous links to pro-ISIS media outlet magazines.

37. On or about January 31, 2023, CHS-1 received a direct private ECS message from MERCURIO which included a .zip file titled "Important Links Collection." MERCURIO revealed that the link was created by "our dear brother [alias referring to Individual 1]" and this was the last update version prior to (individual-1's) arrest. MERCURIO wrote to CHS-1 saying,

"This page is one of the things that helped me believe what I do today." And, "He stopped working on it on this not long after starting the Taliban Exposed page."

38. On or about February 3, 2023, CHS-1 observed several .pdf files in a private ECS chat posted by MERCURIO. The .pdf files contained additional pro-ISIS content and media files.

39. On or about March 24, 2023, CHS-1 was in contact with MERCURIO via direct messaging on the ECS. In summary, MERCURIO provided CHS-1 with a .pdf document created by MERCURIO. The .pdf announces the establishment of "Lighthouse Foundation for Media Production" and pledges his allegiance to (ISIS leader) "the Mujahid-Shaykh", abu al-Husayn al-Husayni al-Qurashi. MERCURIO states that "the primary purpose of our foundation – in adherence to the orders of the Islamic State – is to spread it's aqidah⁵ and methodology."

⁵ Aqidah translates to "creed" to include religious belief and doctrine. Here, MERCURIO specifically refers to ISIS's aqidah.

40. On or about May 20, 2023, MERCURIO created a new ECS Group called “Group Chat-2” as a repository for work done on his aforementioned “Lighthouse Foundation for Media Production.” Between about June 9 and 11, 2023, CHS-1 observed a document posted to Group Chat-2, attributed to MERCURIO. The document was titled “The Official Mission Statement and Pledge of Allegiance from Lighthouse Foundation for Media Production.” And included the following statement:

"In the modern world, the digital realm is one of the most important areas one can be in...The Islamic State - our beloved Caliphate, may Allah protect and preserve it - understood the important of the media, and thus hastened and mobilized great resources to wage what has now been termed 'Media Jihad.' It was through this Jihad in the media world that the Islamic State was able to win over so many supporters, sympathizers, soldiers, leaders, and others to its righteous and pure cause. Media Jihad has never been as important and vital to the cause of Allah as it was before. In an era where few people trust their own governments and news outlets, and rely upon the Internet for their information and news stories, the opportunities for the media mujahidin to spread the trust has only grown exponentially. However, in recent years, the Islamic State has fallen upon great hardship...Thus, we, your brothers at Lighthouse Foundation for Media Production, intend to rectify this issue by making our own original educational content in English and other languages, such as Russian, Ukrainian, Polish, German, French, Bangla, and many others, in order to spread the 'aqidah and manhaj of the Prophet, the doctrine of the Islamic State. Our content will primarily consist of digital books, which will be short, simple, concise, detailed, and easy to read."

MERCURIO goes on to offer his pledge of allegiance to the Islamic State stating, *"In adherence to the command of Allah and His Messenger, we, your brothers in religion at Lighthouse Foundation for Media Production, declare to the world, that we pledge our allegiance to the Caliph of all Muslims, the Commander of the Faithful, the Mujahid, the Shaykh, Abu al-Husayn al-Husayni al-Qurashi. We pledge to selflessly hear and obey, in times of ease and hardship, in matters of delight and dislike, never to disobey those in*

authority, unless we have clear proof of disbelief, from which we will have from Allah, and Allah is witness to our pledge."

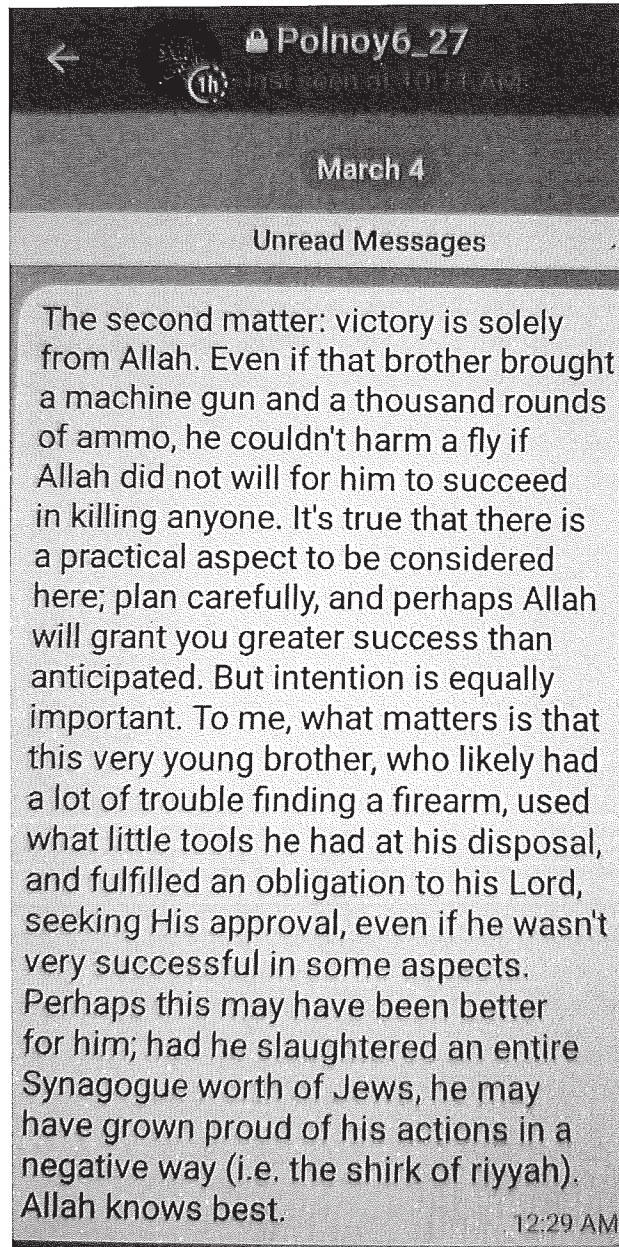
41. Between about March 1 and 5, 2024, CHS-1 and MERCURIO shared a direct messaging conversation including the below:

MERCURIO said he does not have many excuses *"for being here"* and adds that he has had opportunities to do good, but he has not done it. MERCURIO says that he is becoming *"stressed out"* and has not met his goals. MERCURIO tells if he does anything, the most important thing to him is that he does it for Allah. MERCURIO says that for Ramadan, MERCURIO wants to open a channel where he would be able to post *"good material and knowledge."*

CHS-1 mentioned a stabbing attack that took place in Switzerland where a Jewish man was stabbed.

MERCURIO then sends the following two messages (below images) related to feelings about notoriety and infamy in carrying out an operation and writes about a hadith where a martyr was sent to hell due to the fact he waged jihad for the purpose of becoming a war hero alone.

← Polnoy6_27
1. There is no doubt that at some point when you're planning and going through with an operation like this, you think about the infamy and notoriety that comes with it. You don't just want to slaughter the unbelievers because they fight against Allah and His messenger (peace and blessings be upon him), but you also want to be infamous among them, hear their retellings of your deeds and take satisfaction in essentially being a criminal celebrity, much like the serial killers and the particularly depraved convicts of society. Remember: intention is everything. I'm sure you know of the hadith where a man was martyred in jihad but dragged into the hellfire anyway because he waged jihad to be a war hero. Even if you agree with the hukm of Allah and want to be a mujahid fisabilillah, there can be no attempt to gain glory and fame. The expression of "God, glory and gold" doesn't apply here. Either it is all for the Lord Almighty, or it is not. Anything and everything else merely taints and destroys your rewards. 10:23 PM



42. On or about September 4, 2023, MERCURIO sent a link in an ECS private Group Chat-1, where MERCURIO shared a link to the Telegram account for the core ISIS media outlet, Nashir News. On or about March 11, 2024, CHS-1 observed several messages posted by

MERCURIO in the same ECS Group. MERCURIO's message included a Ramadan message to the group stating the following:

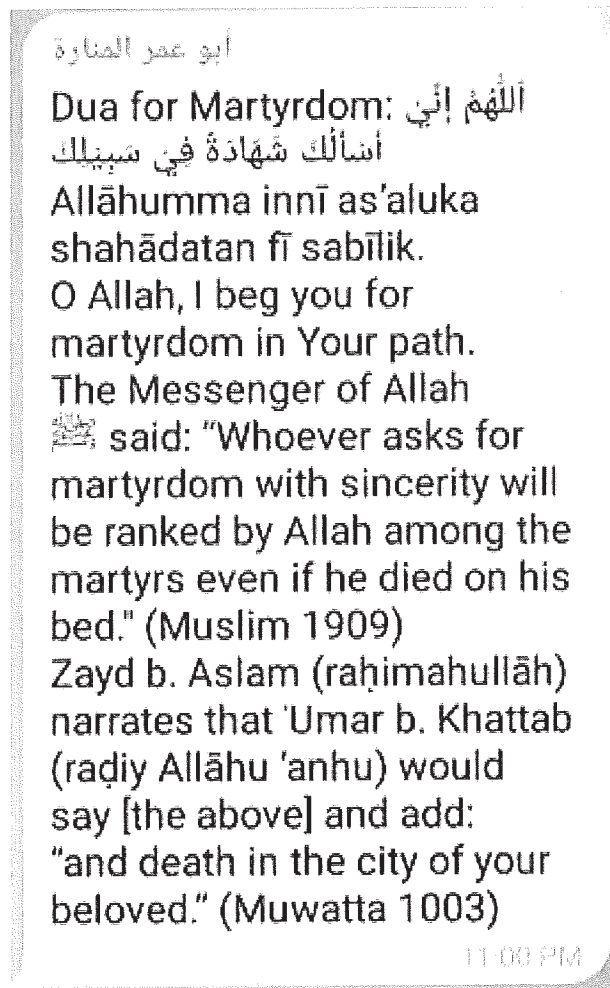
"...I ask Allah to accept the efforts and deeds of ourselves and our brothers and sisters, to free the prisoners and grant victory to our beloved State. May Allah make us one of His gallant soldiers fighting for His sake and His sake alone, with our lives ending in victory or martyrdom."

MERCURIO's Intent to Fight and Ba'yah

43. Beginning in October 2022 through the time of this arrest, MERCURIO has continued to express his intent to fight for ISIS through declaring his Ba'yah, or oath, to ISIS and developing his plans and actions on how he might support the ISIS cause.

44. On or about October 2, 2022, MERCURIO stated on Group Chat-1, "*Working is ok but my number 1 thing is to make H and go join the S*". Based on my training and experience, I am aware that MERCURIO likely meant to "make hijra" for the "H" and join ISIS (also known as "the State") for the "S". I also know "hijrah" is an Arabic term meaning "migration" that, in jihadist ideology, refers to a Muslim's religious obligation to migrate to territory controlled by an Islamic caliphate and ruled according to jihadist ideology, while "jihad" refers to holy war, and "shuhada" refers to those that die as martyrs in jihad.

45. On or about January 1, 2023, MERCURIO shared a "Dua for Martyrdom" post as shown below:



46. On or about August 3, 2023, MERCURIO sent the following message to CHS-1 via direct message pledging his allegiance to the new leader of ISIS:

"Sending this to you as a friend and as a witness. I pledge my allegiance to the Caliph of all Muslims, the Commander of the Faithful, the Mujahid, the Shaykh, Abu Hafs al-Qurashi (may Allah protect preserve him). I pledge to selflessly hear and obey, in times of ease and hardship, in matters of delight and dislike, never to disobey those in authority, unless I have clear proof of disbelief, from which I will have from Allah. And Allah is witness to my pledge.

MERCURIO also updated the publications pledge with the name of the new ISIS leader.

47. On or about February 13, 2024, MERCURIO direct messaged CHS-1 about feeling insincere when he asks for martyrdom, and that he doesn't want to live anymore. MERCURIO said that if he had the money he would create a "*suit of powered armor*" and "*...heap massacres upon the kuffar daily...*" MERCURIO also discussed travelling to become a soldier or part of a media team in West Africa. "*If I don't have money for either, I'll just do a home op.*"

48. MERCURIO revealed to CHS-2 that he felt he should be doing more with his religion. MERCURIO told CHS-2 that although he wants to make hijrah, he does not feel secure with martyrdom because he does not feel sincere enough. MERCURIO advised that he desires to leave the US and fulfill his obligation, but expressed that he cannot go now.

49. On or about February 27 and 29, 2024, CHS-1 had direct messaging contact with MERCURIO. During an ECS direct messaging conversation, MERCURIO told CHS-1 that if he makes enough money for himself "*and the State,*" he will be able to move out of his house and "*make hijrah soon.*"

50. On or about March 21, 2024, MERCURIO and CHS-1 shared a conversation through ECS direct message. Below is a summary and/or direct quotes from this conversation:

MERCURIO tells CHS-1 that he has been thinking about jihad during this Ramadan and states the following:

"Also, I know it's probably reckless, but... I've been thinking about Jihad. Well, I always am, but I mean it's Ramadan, and I'm getting awfully restless and frustrated. How much longer can I keep living in such a humiliated and shameful state? I have motivation for nothing but fighting...like some kind of insatiable bloodlust for the life juice of these idolators; a craving for mayhem and murder to terrorize those around me. I need some better weapons than knives." "It's something I'm serious about. Probably some kind of arson attack with a homemade flamethrower. Primarily against Churches.

If I can get a gun or stronger weapon, engage police units. Just look at how many are here near me.”

MERCURIO shared a map that depicts Coeur d’Alene, Idaho, and various churches therein.

51. On or about March 22, 2024, MERCURIO and CHS-2 shared a direct messaging conversation. Below is a summary and or direct quotes from this conversation:

MERCURIO shared that he had not been doing well and had not been fasting during Ramadan. MERCURIO advised that he was restless, frustrated, and tired. MERCURIO stated:

“I don’t know how much longer I can take being here, the siege of jahiliyah [ignorance] is strangling me. I don’t have the desire to do anything except Jihad...a craving for mayhem and terror.”

MERCURIO continued that he wants to do *“something partially for the sake of satiating some kind of bloodlust.”* MERCURIO advised that there was apprehension about conducting an attack in the United States. He stated he did not want to be reckless in an attack but also not did not want to keep *“sitting here.”*

52. Between March 23 and 24, 2024, MERCURIO and CHS-1 shared a conversation through ECS direct message. Below is a summary and/or direct quotes from this conversation:

MERCURIO told CHS-1 that he has not utilized his time effectively during Ramadan, and he questioned whether or not he [MERCURIO] is a Muslim due to him sinning. MERCURIO spoke about a Muslim preacher, who is well known among ISIS supporters, and how he is influenced by him. CHS-1 asked MERCURIO how he was doing and MERCURIO responded:

“Same as usual...I’m dreading the next two weeks of Ramadan. I really want to do an operation, but I just don’t have a lot to work

with right now. I really don't want to miss out on the opportunity for jihad in Ramadan, the month of conquests."

Attack Planning and Preparation

53. On or about November 28, 2023, MERCURIO discussed his lack of interest and knowledge of firearms and told CHS-1 that he has only been shooting twice.

54. Between March 25 and 26, 2024, MERCURIO and CHS-1 shared a conversation through ECS direct message. Below is a summary and/or direct quotes from this conversation:

"I've only got two weeks left [please note: the corresponds to the end of Ramadan]...I really want to do an op here..."

MERCURIO went on to discuss his thoughts about what type of weapon to use and his inability to obtain a firearm or construct explosives.

MERCURIO Continued: "The plan is basically this: lie to my dad and say I'm going on a walk, leave, walk to a park, send the bayah video, delete all my social media on my phone, then walk to the nearest Church. Stop close by the church, equip the weapon(s) and storm the temple, kill as many as possible before they inevitably disperse/scatter, then burn the temple to the ground and flee the scene, then move onto the next church, rinse and repeat for all 21+ churches in the town until killed."

MERCURIO discussed using a "flame sword" and/or an alternative melee weapon as an option for the attack and described the fact that it may not be effective at killing people immediately. MERCURIO also discussed using an aerosol can and lighter as a tool for the destruction of the church. CHS-1 responded to MERCURIO by asking several clarifying questions about MERCURIO's plan, any research MERCURIO had done, and how MERCURIO planned on acquiring weapons and or tools. CHS-1 also told MERCURIO that the plan needs additional thought.

MERCURIO Continued: *"...I'm doing the weapons research right now. Resources should not be hard to find. Literally stuff you can buy at [employment-1]. The weapons are something I'll hide in my room and design them to be easy to conceal in a jacket or coat."*

MERCURIO advised that his plan to deal with any police contact will likely be improvised.

CHS-1 responded by telling MERCURIO to do thorough research and asked if

MERCURIO will be ready before the end of Ramadan. MERCURIO clarified that he will

not be dealing with explosives and talks about safety when using "fire-related weapons."

MERCURIO Continued: *"...I will probably do it in the last few days of Ramadan...probably on Sunday, their special day (28th Ramadan/7th April)."*

55. On or about March 26, 2024, an FBI Online Covert Employee with whom MERCURIO had previously communicated, received the following direct message from MERCURIO on the same ECS:

"...I wanted to tell you something important. I am going to perform a martyrdom operation very soon (by the will of Allah). It will occur in the last few days of Ramadan. The targets will be the various churches in my town. I will provide more details later. I will eventually send you a video. I will pledge my allegiance in this video. Can you send that video to the Central Media department when the time comes?"

56. On or about March 27, 2024, MERCURIO and CHS-1 shared a conversation through ECS direct message. Below is a summary and/or direct quotes from this conversation:

MERCURIO: *"I am going to build a crude flamethrower and a "flame sword," although it's more like a club or baton than a sword. I'm in the design and locating materials phase now. I need to find metal piping and some parts which I can assemble into a weapon without using power tools..."*

"The time with my mother was fine. She did speak briefly about the Krokus attack and seemed confused and horrified about why they

shot a bunch of civilians. I can't say I tried to make her accept me, because she always hated my religion from day one. I still hold a big grudge against my parents for what they have and continue to do to me"

CHS-1 inquired with MERCURIO about raising suspicion.

MERCURIO: *"Depends on how I build them. Lighters aren't suspicious, and neither is hair spray or aerosol cans. Kerosene and propane, maybe. The actual issue is the metal piping. There don't seem to be any for sale at my store. So how am I going to find metal pipes of adequate size and length?"*

CHS-1 asked if MERCURIO worked at Employment-1.

MERCURIO: *"They even have a guns section lol." "Maybe PVC pipes, maybe some plastic, but I want metal because it's durable and also can resist heat better than plastic...Also hits harder." ... "IDK, Idaho isn't too strict with guns but the selection at [employment-1] is like...ten hunting rifles/shotguns and a few handguns, super pricey and there is no way I could bring one of those home."*

CHS-1 inquired about MERCURIO's father watching.

MERCURIO: *"Well, he sees everything I purchase on the bank info and when he picks me up from [employment-1]. So for example, I would have to buy a lighter and a small amount of kerosene, but then buy some food too and make it look like I just bought some snacks. It also can't be too expensive, so fifty dollars worth of bizarre materials cant be so easily hidden by a few donuts and chips." And "It's a precarious situation."*

In referring to testing weapons, MERCURIO stated: *"I *should* test them out but I don't know any public or private place where I can safely do that. Especially if it involves fire...the things I'm building are very dangerous to both others and myself. Accidents are possible."*

When asked by the CHS-1 about the map of churches, MERCURIO stated: *"There are live three or five churches within walking distance of me so targeting those ones isn't hard. The others are farther away, I'd have to hijack a car and drive over."*

57. On or about March 27, 2023, CHS-2 met with subject MERCURIO in Coeur d'Alene, Idaho. The activities and conversations between CHS-2 and MERCURIO were recorded. The following is a summary of the observations of FBI Special Agents and Task Force Officers, and subsequent debriefing accounts of CHS-2:

58. During the meeting, CHS-2 and MERCURIO discussed the following:

MERCURIO told CHS-2 that he (MERCURIO) “...needs to do something.” and revealed a current plan to CHS-2 about building “something like a flamethrower.”

MERCURIO stated that a flamethrower only throws flame for about a minute. He [MERCURIO] said he is working on something that will last longer but would require 60-70 pounds of fuel he would have to carry.

MERCURIO was “considering” killing his father, and that his father is at home at all times due to an old work injury. MERCURIO told CHS-2 that his family “oppresses” him, and both of his parents do not like that he is Muslim. MERCURIO advised that his parents don’t give him a hard time about it due to the fact that he is keeping out of trouble, getting good grades, working, and keeping his worship to himself.

MERCURIO spoke to CHS-2 about a martyrdom video, and revealed that he has a contact he intended to send his video once it was made.

MERCURIO told CHS-2 that there were 20 to 25 churches in the area, and mentioned a specific church he was aware of near his school. Based on physical proximity, the FBI identified there is one local church (Church-1) located less than two miles from MERCURIO’s residence.

59. During their contact CHS-2 inquired about logistics for MERCURIO's plan including his means of travel to target locations. MERCURIO stated that he would go to the locations on foot due to the fact that he only has a learners permit for driving which requires an adult to ride with him. CHS-2 asked MERCURIO if having an adult was necessary due to the fact that he is moving forward with his plan. MERCURIO advised that in order to use a vehicle, he would have to get the keys from his father who is always home.

60. On or about March 28, 2024, MERCURIO told CHS-1 through ECS contact that he met "*with the brother.*" Based on my understanding of the case, I assess the "brother" to likely be CHS-2. CHS-1 asked MERCURIO if he mentioned his (MERCURIO's) plans to the "brother" and MERCURIO replied "*...he is a trusted brother so I did tell him.*" CHS-1 also inquired whether or not MERCURIO had been following an instruction manual. MERCURIO responded to CHS-1 saying the "*main impediment is the weaponry*" and a flaming sword may not be practical. MERCURIO advised he would think about making something more "*sophisticated.*"

61. On or about March 28, 2024, CHS-2 met with subject MERCURIO in Coeur d'Alene, Idaho. The following is a summary of the observations of FBI Special Agents and Task Force Officers, and subsequent debriefing accounts of CHS-2. MERCURIO told CHS-2 that he had only done research of churches online and had not visited or conducted any in person activity at any location. While driving with CHS-2, MERCURIO pointed out a church (referred to here as "Church-2"), but later stated the location was too far away to be one of the targets. Later in the meeting, MERCURIO showed CHS-2 potential locations on a map, which included a two Christian denomination churches as well as Church-1, and discussed a prospective order of the

targets. MERCURIO made the statement that there were too many churches, and “*I am going to fix that real soon.*”

62. On the same date, MERCURIO told CHS-2 that he had not purchased or gathered any materials for weapons, and that he would likely purchase butane and propane at Employment-1. MERCURIO mentioned using pressurized canisters as fuel for a torch and also for explosives. MERCURIO told CHS-2 that he could obtain fuses and combine them with the pressurized canisters to use as a type of grenade. MERCURIO stated that he could purchase numerous “*fanny-packs*” and use them to store the canisters on his body. Once MERCURIO had purchased all the items, he would consider testing how to carry the items while in his backyard to determine feasibility. MERCURIO told CHS-2 that he would likely hide the items in his closet at home or in a toolbox. MERCURIO also discussed using an aerosol can and lighter as a “*flamethrower*” but has not tested this and only viewed videos online about them.

63. MERCURIO revealed to CHS-2 that he had not filmed a martyrdom video but planned on including the following details: MERCURIO’s pledge to ISIS; a message of revenge for his brothers and that his victims did not have a right to live; and a message to non-Muslims that their “*crusade*” will not be successful. MERCURIO said that he does not plan to film the attack as he felt that filming would be insincere.

64. MERCURIO told CHS-2 that he had a contingency plan, which included “*crude methods*” and mentioned the use of an axe, or other items like a machete, hatchet, or knives that are available within his father’s survival kits to conduct an attack. MERCURIO told CHS-2 that his plan of attack included arriving at an early hour and slowly creeping into a church, and that along with killing people, he wants to scare them into running away. MERCURIO discussed his

plan to create havoc when law enforcement responded, which included using the propane on his body to create a final explosion.

65. MERCURIO told CHS-2 previously that he was “*considering*” killing his father, and clarified with CHS-2 that the talk of killing his father was “*more of a practicality*” in order to obtain a firearm and advised that he did not want to do it and preferred not to do so.

66. During their meet, CHS-2 offered MERCURIO an ISIS flag, which he accepted. MERCURIO described it as “*beautiful*” and “*wonderful.*” (your affiant submits that this was likely the flag recovered during the search as referenced above and below).

67. On or about March 29, 2024, MERCURIO and CHS-1 shared a conversation through ECS direct message. Below is a summary and/or direct quotes from this conversation:

MERCURIO told CHS-1 that he had received an ISIS flag from the CHS-2 and that he would discuss his meeting with the “*brother*” with CHS-1 at a later time.

MERCURIO told CHS-1 that he had begun buying items piecemeal, and shared that he had purchased lighters and hand-sanitizer. MERCURIO stated that the hand-sanitizer would burn much slower and was purchased as a substitute for kerosene. MERCURIO told CHS-1 that he would likely purchase small propane canisters to be used as grenades and/or an explosive vest and would likely use them last. MERCURIO said that if he could not attach fuses to the propane canisters, he would do the following:

“I will simply strap them to my body, open one up then out a lighter next to it and detonate all of the cans in a chain explosion as a crude substitute for an explosive vest.”

68. On or about March 29, 2024, CHS-1 asked MERCURIO about the hand-sanitizer, and MERCURIO stated,

“Ehh ... I just sort of googled this stuff up. Sanitizer isn’t explosive but it is flammable. It burns for a long time because it is vicious, kind of like tar. Safer than tar too, no dangerous toxins released into the air.”

CHS-1 told MERCURIO to be careful and MERCURIO said *“I know. I’m using TOR as my research gateway.”*⁶

69. On or about March 29, 2024, CHS-1 asked MERCURIO about the time frame for his attack and MERCURIO responded,

“I know. I set a tight deadline for myself. Maybe a little too tight... but I don’t want to miss out on jihad in Ramadan.”

70. On or about March 30, 2024, MERCURIO and CHS-1 shared a conversation through ECS direct message. Below is a summary and/or direct quotes from this conversation:

MERCURIO told CHS-1 that he is not buying propane until a day or two before the attack and wants to store them for as little time as possible to avoid detection by his father. MERCURIO included a photograph of a 16 oz propane tank and noted that he wanted to purchase at least four of them.

MERCURIO told CHS-1 about his idea to utilize a metal pole with electrical tape and doused with a flammable liquid. MERCURIO said he wanted to use the pole to hit people and believed that the fire will help spread infection in the open wounds of the victims.

MERCURIO told CHS-1 that he has asked his *“brother”* (CHS-2) to take him to a store to purchase the metal pipe. MERCURIO also advised that if he is cornered or wounded, he

⁶ Tor is an open source software that utilizes multi-layered encryption in order to enable anonymous communications. Although there are vulnerabilities to TOR which can allow for users to be tracked by supplicated entities, it is generally considered a highly secured way to operate on the Internet.

would light his propane vest on fire with the belief that it would explode and take additional people with him.

71. On or about and between April 1 and April 2, 2024, MERCURIO and CHS-1 shared a conversation through ECS direct message. Below are direct quotes from MERCURIO in this conversation with CHS-1:

"I got two cans of butane instead. Cheaper and smaller. He [MERCURIO's father] still doesn't suspect a thing..."

"Wanted to finally talk to you at length...My plan is pretty solid now: walk into a church, and then start beating people with the "baton;" hit them first on thr kneecaps and elbows. Batons aren't meant for mass crowd attacks. I have to be slow and methodical. I will beat them only to incapacitate them, I will use my knives and machete to slit their throats and kill them. When everyone is dead or gone, I will start a few fires and chuck the gas cans at the fires to cause explosions and structural damage. Then I flee the scene and repeat until I am martyred. Another brother of mine is working on translating my video script."

72. Between about March 27 and March 28, 2024, MERCURIO shared a private conversation with OC-1:

OC-1: السلام عليكم ورحمة الله وبركاته (May the peace, blessings, and mercy of God be upon you)

I talked to brother here and he want to know some things if you know

When you want send video?And most important when. You want video released? That up to youI make Dua for you and victory akhiالله في أمان (Go with Allah's protection brother)

MERCURIO: وعليكم السلام ورحمة الله وبركاته (And may the peace, blessings, and mercy of God be upon you) [sent as a GIF]

I will send the video a day or a few days before the operation.

Release the video after I am confirmed to be dead. I will you more later, like where I live and what weapons I will use.

*I will tell you more later, like where I live and what weapons I will use.

OC-1: طيب جزاك الله خير يا أخي (Ok, thank you brother)
نخبرني لما يكون قادرا (Inform me when you are able)
أستودعكم الله الذي لا تضيع ودائعه (I place you in the trust of Allah, whose trust is never misplaced.)
211 حصن المسلم (Hisn al-Muslim 211 : Fortress of the Muslim Hadith, Sahih)

73. On or about March 26th, 2024, UC-1 direct messaged a second ECS account with the display name “Killer” known to be used by MERCURIO. UC-1 asked “Killer” of a post that “Killer” had shared. The following day, UC-1 direct messaged “Killer” and asked “Killer” what was happening with Group Chat-2. “Killer” stated that he was busy and that he would explain later.

74. The following day, on or about March 28th, 2024, UC-1 messaged MERCURIO on his previous account originally identified as “Polnoyedinstvo” because MERCURIO’s alternate account “Killer” was deleted. UC-1 asked what happened to Group Chat-1. MERCURIO responded it was shut down due to a huge wave ban on ECS groups. MERCURIO created a new ECS Group called “Brothers” on March 30, 2024. A little later in the day, MERCURIO then opened a secret ECS chat with UC-1 and stated that it would be safe to communicate because conversations are encrypted and secure. As of April 4, 2024, the group “Brothers” was still active.

75. On or about April 1, 2024, UC-1 communicated with MERCURIO through an ECS direct message. MERCURIO stated the following:

“A while back you asked me about the [Group Chat-2] group. I deleted it now...there is no need for it anymore. “Lighthouse Foundation” is now defunct. This Sunday, I am going to be carrying out a martyrdom operation. With my passing, there will be no more publications or written works.”

UC-1 confirmed he no longer saw either of the two groups and asked what type of operation MERCURIO intended to carry out.

MERCURIO: "*Istishhadi operation.*" [your affiant submits that "Istishhadi" means martyrdom].

UC-1 asked if there was anything UC-1 could be helping him out with.

MERCURIO: "*Ameen wa iyyak. There is nothing you can do for me in your situation aside from praying for my success and martyrdom, among other things.*"

76. On or about April 2 and April 3, 2024, MERCURIO contacted CHS-3 on an ECS direct message and the following conversation took place:

MERCURIO: Brother, I need your help with something important. This Sunday, I will be carrying out a martyrdom operation in my hometown. Just before I head out to do it, I want to donate every last cent in my bank to the State through Monero. Is this possible and if so, how can it be done?

CHS-3: Without being detected, it's difficult. I know some iikhwan from khorosan who can help.

MERCURIO: What do you mean "detected?"

CHS-3: Sending it directly to them may be traceable, everything I beleive is traceable. You may have to use intermediaries. Contacts which forward the funds, etc.

MERCURIO: Yeah, I assumed middlemen would be necessary.

CHS-3: Yes akhi I know a brother who can help the brother is offline it's 3AM where he is. so when he responds I'll message you akhi, and jazakallah khayr for your efforts dear brother if there's anything I can do to help just ask akhi

MERCURIO: I just need help with the donation, that's all.

CHS-3: so when he responds I'll message you akhi, and j.....Ameen wa iyyak.

77. On or about April 2, 2024, MERCURIO sent a direct message to UC-1 and stated,

"I made a small library channel with educational and beneficial works. Don't share the link with anyone."

MERCURIO sent a link to an ECS location called "Library." Of note, Library was an ECS group created on March 28th, 2024, currently consisting of ninety-one (91) pdf files. On March 28, 2024, eight (8) files were added to Library. On March 29, 2024, thirty-one (31) files were added to Library. On April 1, 2024, fifty-two (52) files were added to Library.

MERCURIO had a Meeting with CHS-2 a Few Days Prior to his Planned Attack

78. On or about April 2, 2024, CHS-2 picked MERCURIO up at a location in Coeur d'Alene at approximately 3:00 p.m. From there, CHS-2 drove Mercurio to a store in Hayden and then back to the hotel where they spent the rest of the evening together. While in the vehicle, MERCURIO shared that what he is using for his operation does not require testing, therefore he has no plans to test the materials. MERCURIO stated that his plan is to go for a walk after work on Sunday since he can't get out of going to work without raising suspicion of his father. MERCURIO stated he will walk to one church near his home. MERCURIO then stated he will use the metal pipe to hit people in the joints, elbows, and kneecaps to incapacitate them. He then stated he will use his knife and/or machete to kill them. MERCURIO will use one end of the metal pipe to soak in solution and light on fire to keep people away from him. MERCURIO mentioned that he has a knife that he will use. MERCURIO mentioned he looked up tactics online.

79. Later at the hotel, MERCURIO mentioned that he received the Arabic translated version of the words he plans on using for his ba'yat video.⁷ MERCURIO read the English version to CHS-2 to include his allegiance to the current leader of the Islamic State, the importance to respond to the call to the caliphate by killing Jews and Christians, and his message to the disbelievers to go to hell. CHS-2 and MERCURIO discussed recording a ba'yat video the following day and for MERCURIO to bring the flag to the hotel to display in the background of the video.

80. MERCURIO told CHS-2 he was communicating with an individual online through whom he will donate money via crypto currency to the State (ISIS). According to MERCURIO, he had \$8,000 USD in his savings account and \$3,000 USD in his checking account.⁸

81. MERCURIO shared that his plan is to go home after work to pray, to use the restroom, grab his backpack and fill his pockets, walk to the church, pull out the pipe to light it on fire on one end, hit people in the elbows and knee caps, force them to the ground, slit their throats with a knife or machete, start small fires, use gas cans to throw at the small fires to cause an explosion and when the police respond he will hide in a corner and attempt to grab the gun of an officer to use. MERCURIO implied that in conducting the attack, he intended to perform a good deed. CHS-2 later returned MERCURIO to the park near his home.

⁷ Based on my training and experience, the "bay'ah/bay'at" video is intended as a pledge of allegiance and request for acceptance into a foreign terrorist organization, in this case the Islamic State, and has been done to memorialize the creator's allegiance to said FTO prior to committing a violent act or martyrdom operation. This step is crucial to MERCURIO's operation as it will state his purpose for the act and his allegiance to an FTO. In video/audio form it can be shared and reproduced as a type of propaganda to influence others to conduct similar acts of terrorism.

⁸ According to prior financial analysis of bank records for accounts attributed to MERCURIO, as of 12/26/2023 an account had a balance of \$1,520.85 and as of 12/29/2023 a separate account had a balance of \$8,108.16.

82. On or about April 3, 2024, CHS-2 picked up MERCURIO at a park located near MERCURIO's residence at approximately 3:00p.m. CHS-2 drove MERCURIO to a hardware store where MERCURIO selected a 24-inch threaded metal pipe for purchase. MERCURIO paid for the pipe in cash. CHS-2 drove MERCURIO to the hotel where they spent the rest of the evening together.

83. MERCURIO mentioned feeling peaceful as he is tying up his last affairs. MERCURIO mentioned getting rid of all incriminating information such as social media, computer drives, and phones. MERCURIO showed CHS-2 the knife he plans to use for the attack. CHS-2 described the knife as a Smith and Wesson knife with an approximately four-inch blade. MERCURIO motioned using the knife to stab an individual.

84. MERCURIO's mom called and the two spoke for a few minutes. After the call, MERCURIO retrieved an Arabic language translation of his ba'yat speech on his cell phone that he received from an Arabic speaking associate. MERCURIO also took out the ISIS flag and CHS-2 helped MERCURIO hang up the flag on the wall. CHS-2 used MERCURIO's cell phone to record a version of a ba'yat video. MERCURIO held the knife to show in the video. MERCURIO asked CHS-2 to take a picture of him in front of the ISIS flag while holding the knife because MERCURIO decided he might use a still photo with his voice recorded. The picture is as follows:



85. MERCURIO then discussed using a particular cryptocurrency to send money to ISIS. MERCURIO told CHS-2 that he wanted to give CHS-2 the money he currently had in his wallet to use for whatever CHS-2 wanted. MERCURIO left \$56 USD and some change on the table despite CHS-2's refusal to take the money.

86. MERCURIO repeated to CHS-2 the same plan of attack as the day before but included that he will try to hijack a car to get to the next church. MERCURIO mentioned that he still wanted to get a hold of his father's guns that are locked in a closet. MERCURIO shared that perhaps if his father went out of the house to run an errand or took a nap that it would provide an opportunity for him to access the guns. MERCURIO wanted to take his father's AR-15 and put it in his backpack disassembled. MERCURIO mentioned that if he got caught by his father, he might handcuff his father.

87. The rest of the evening was spent on discussion of religious topics, some of MERCURIO's childhood, ways to get rid of incriminating information, praying, preparing food in

the kitchen, and eating. CHS-2 returned MERCURIO to the park near his home at approximately 8:30 p.m. CHS-2 shared that MERCURIO cried at one point while they were in the hotel.

MERCURIO had Additional Online Distribution of Terrorist Materials

88. On or about April 3, 2024, UC-1 sent a direct message to MERCURIO and asked which of the PDF files on Group Chat-3 UC-1 should devote extra attention to.

MERCURIO said to, "Focus on takfir and Aqidah...I will upload more related to that in the following days."

UC-1 asked whether the PDF files have been confirmed and verified by legitimate scholars.

MERCURIO replied, "The books I uploaded are from Dabiq (Raqqah-based online magazine of the Islamic State, published via the deep web from July 2014 to July 2016)⁹ and Rumiyyah⁹ so yes...and the other books I post are from people with the same manhaj (Arabic word meaning method, path or doctrine) and Aqidah" (Aqidah is an Islamic term of Arabic origin that literally means "creed").

UC-1 concurred with MERCURIO that Dabiq and Rumiyyah are valid sources and will focus on the studies the last days of the month of Ramadan. UC-1 asked MERCURIO to help him locate Library studies on takfir and Aqidah.

MERCURIO responded, "They aren't there yet. I will upload more books later."

UC-1 said he was unsure of MERCURIO's operation, however, there can be no mistake. UC-1 asked for MERCURIO to confirm that he wants to go through with the operation.

MERCURIO: Ameen wa iyyak... Yes, I'm sure I want to do this.

89. On or about April 4, 2024, MERCURIO told CHS-1,

⁹ This is an online magazine used by the Islamic State for propaganda and recruitment.

"I am going to speak to you tomorrow; send you some audio messages. In the meantime, I have decided not to make a bay'ah video, but rather record an audio message with a picture. You want to see the picture?"

MERCURIO then sent CHS-1 the photograph of himself standing in front of an ISIS flag holding a knife (the same photo referenced above).

90. On or about April 4, 2024, MERCURIO and CHS-1 shared a direct messaging conversation where MERCURIO provided two audio recordings to CHS-1.

In the first recording, MERCURIO stated he originally recorded an audio recording that was over 15 minutes long but it got deleted, so he was going to be shorter in upcoming recordings. Thereafter, MERCURIO stated the following portions of the recording,

I hope you are well. I pray that we meet again in jannah¹⁰. I'm really worried, really scared about a lot of things, you know, I don't wanna mess up I don't wanna screw up I don't want to be insincere. I want shahada I wanna be a Shaheed¹¹ a sincere one completely you know. I want to do this right and I'm very scared very worried about everything.

I got an idea. I ask you especially for your prayer. I really need a good opportunity ahhh I really want to get into my ah Dad's closet so I can steal the guns and use those. Ah I really really want to, cause if I'm just using this ah the pipe the galvanized steel pipe that I bought, um, I just, I just don't want to do that...I really really need those guns. I know you're already praying for me, and I know I beg for it every other time I talk to you but...yes you're Duha, I really need those right now.

My dad has got to be out of the house for a solid period of time and...I don't even know if that closet door is locked. If it is I need the key. If I can get that key of his and open the door, the closet and see what he's, and steal the guns then yes Inshallah that everything will be so much easier and better and I will achieve better things but I

¹⁰ The word "jannah" refers to heaven or paradise.

¹¹ The word "Shaheed" means martyr.

don't know if I can get them! And I've only got a few days left so it is kinda you know a rush against time...pray for my success.

MERCURIO in Audio 2: *Well anyway, uh, meeting with the brother went well. Alhamdulillah, I'll speak about him later. I guess, I don't know. Just yeah, got a lot on my mind. I'm really scared, really worried I want to do this right.*

I just, I just hope I won't mess it up again. I did a bad thing last night. I won't say what. I'm trying to have taqwa, cause if you'll have taqwa you'll succeed. You know, Muslim's fail because of their sins and their bad deeds. So, you know, I gotta be on my best behavior so I can have success. But that's kinda hard to do when you're surrounded by so much filth.

Anyway, brother, I really hope you're well. Again, I pray we meet each other in jannah. [unintelligible]. You are beloved to me. Thank you for basically being my therapist, you know because I come to you every other day like "Ugh I hate my life and life sucks, waaa waaa" and you always tell me "oh it's fine." So, thank you for that. Thank you very much. May Allah award you and bless you so very very much. I don't know how close you are to making hijrah and waging jihad and whether that's elsewhere or here, or wherever. But I hope you get to do that real soon. I hope you get to do that real soon. Cause, there is no life without jihad. None.

CHS-1 responded, but indicated CHS-1 was not able to send a voice message and said "...if it means a lot Inshallah I will try to figure a way for you to hear my voice before the operation."

"As for the main points you raised I'm always making Dua and will continue especially given the messages you just told me about. If something doesn't feel right or you are worried I'm here. And if Allah gives me more time I will continue to be here for you. So Inshallah I will be focused on extra dua in light of what you said you're trying to do and Allah should ease your path. And remove all obstacles, hindrances and stumbling blocks blocking your path."

91. On or about April 4, 2024, MERCURIO and CHS-3 discussed how MERCURIO could send financial payments to ISIS.

92. Between about April 3 and April 5, 2024, MERCURIO shared a private conversation with (OC-1):

MERCURIO: I am going to send you the video on Thursday or Friday, by the permission of Allah.

OC-1: (Responds in Arabic) And may the peace, blessings, and mercy of Allah be upon you. Glory be to Allah. I will wait for you.

MERCURIO: I am going to send you a picture and audio recording. I couldn't make a video work. Is that okay?

OC-1: (In Arabic) Okay. Send pictures of yourself, weapons, and targets as well. If you have these details. In the name of Allah I will take any details and spread your story brother. More pictures the better. Everything will go to Al-Hayat Media Center. Go with Allah's protection.

MERCURIO: 1. I am going to send you an audio file tomorrow, where I will pledge my allegiance and state my thoughts. It will come with an Arabic translation. 2. The weapons I will be using are: several knives, bladed weapons, firearms of various types, etc. 3. The attack will occur on Sunday, the 7th of April (28th of Ramadan). It will begin some time in the morning. Please wait until the next day to release proof of my allegiance. I live in the city of "Coeur d'Alene," Idaho. I am going to send you a picture of myself with a knife and the flag of tawhid, alongside the audio tomorrow.

93. On or about April 5, 2024, CHS-2 communicated on an ECS with MERCURIO. After sharing the Arabic translation of his ba'yat audio, MERCURIO then stated that he was thinking about physically incapacitating "but not kill[ing]" his father, handcuffing him, and locking him up. In so doing, MERCURIO intended to spare his father's life while also preventing his father from preventing MERCURIO from obtaining a firearm and executing an attack plan.

94. MERCURIO stated that he will hit his father on the joints with the pipe, turn him over to handcuff him and tape his mouth shut so that his father doesn't scream for help.

MERCURIO also stated that he will probably tape or tie his father's legs together. MERCURIO planned to harm his father just before the operation so that he would stay tied up for a while. According to MERCURIO, once he (MERCURIO) is killed during his attack and he is identified, then individuals will go to his house and can free his father. MERCURIO shared that he now plans to use his father's car for the operation.

95. On or about April 5, 2024, MERCURIO and CHS-2 were in contact via an ECS direct message. CHS-2 asks MERCURIO how he is feeling, and MERCURIO responded that he is "...very nervous and uncomfortable." and "My mind is racing." CHS-2 asked MERCURIO "Are you feeling like you need to postpone?" and MERCURIO responded "No...I can't delay it beyond Tuesday anyway."

MERCURIO Continues to Communicate with CHS-2 the day Prior to the Planned Attack

96. On or about April 5, 2024, MERCURIO sent a direct ECS message to CHS-2. MERCURIO told CHS-2 that he was slipping back into his old habits and "My stress and anxiety is mounting exponentially. I really can't mess this up, but I am basically self-sabotaging through my own behavior. I also worry deeply about you. I don't want you getting investigated because of the time we spent together." At the end of the ECS message, MERCURIO stated: "I've got a lot on my shoulders, and I don't know if I'm up to the task." CHS-2 responded the next day (on April 6, 2024) and stated, "No need to worry about me though. My affairs are all in the Hands of Allah Subhannahu wa ta'ala. What he has decreed for me, no one can prevent, and what He hasn't, can never be used to harm me wal-hamdulillah." CHS-2 continued to state, "... don't worry about me." CHS-2 then stated "Focus on your niyah [your affiant submits that this means the intention to do an act for the sake of God] akhee [your affiant submits that akhee means brother] ... Turn to Allah

in sincerity and He will guide you to what has been decreed for you. May Allah rectify your affairs and replace your anxiety with ease and sakeenah... Walahi, I love you for the sake of Allah.” MERCURIO responded, “Ameen wa iyyak.” According to an F.B.I. translator, this is an expression whereby the recipient of message is indicating their desire that the same happen for the speaker.

97. Thereafter, on or about April 6, 2024, MERCURIO sent a direct ECS message to CHS-2 which included a .wav file “Bayah.wav” of an audio recording of MERCURIO’s final bay’ah.

98. Initial review of the audio file indicates that it was recorded on April 6, 2024. The “Bayah.wav” file has since been transcribed as part of the investigation. Approximately 20 seconds of the initial recording are spoken in Arabic, with the following spoken in English by MERCURIO:

I have three things to say:

The first, I pledge my allegiance to the Imam of the Muslims, the commander of the faithful, the Sheikh, the Mujahid, the Khalif, Abu Hafs al-Hashimi al-Qurashi. I pledge to selflessly hear and obey in times of ease and hardship, in matters of delight and dislike, never to disobey those in authority unless I have clear proof of kuffar from which I will have from Allah. And Allah is witness to my pledge.

The second, in obedience to Allah, I am answering the call of the Islamic State for jihad fisabillillah and to kill the polytheists wherever I find them. Know that Muslim blood is not cheap and as you kill us, you will be killed, and you will not enjoy living in this state of comfort and safety, while you and those whom you elect to represent yourselves have the blood of the Muslims of Falasteen/Falastin, Sham, Iraq, Khorasan, Yemen, Libya, and elsewhere on your hands.

The third, know o’ disbelievers that your war, your crusade against Islam will not succeed. Allah said, “say to those who disbelieve, you will be overcome and gathered to hell, and wretched is the resting

place." I will not live to see the day that the flag of Tawheed flutters over every land, nor the day that the entire Earth is governed by the Sharia of Allah. While, I will gladly spill my blood again and again to make that a reality.

Indeed the Islamic State remains in spite of your coalition and it will remain until the final hour by Allah's permission. And all praise is due to Allah, the lord of the worlds.

99. Your affiant knows, based on training and experience, that in the context of ISIS, a bay'ah serves multiple purposes. It is an initiation rite, declares affiliation and allegiance to ISIS, and it is a propaganda tool used by ISIS to rally and inspire others. Such an oath has been recited by ISIS affiliates before martyrdom attacks.

The FBI Executed a Search Warrant the day Prior to MERCURIO's Planned Attack and Arrests Mercurio

100. On April 6, 2024, at about 1245 hours PST, FBI agents executed a search warrant, issued by the United States District Court in the District of Idaho, for MERCURIO's residence and person. Agents seized the following items, many of which MERCURIO had discussed via ECS messages:

- a. Located within a toolbox in the closet of the bedroom attributed to Alexander MERCURIO, were the following items: Metal pipe, handcuffs, folding saw, head covering, two cannisters of butane fuel, a machete, hand sanitizer, a black Smith and Wesson fixed blade knife, binoculars, balaclava, two lighters, and a black and white "ISIS" flag.
- b. Multiple firearms were located in MERCURIO's father's locked bedroom closet to include multiple rifles and handguns and a quantity of accessible rifle and handgun ammunition. An AR-15 platform weapon was recovered by law enforcement.

101. The items seized corresponded to MERCURIO's stated attack. MERCURIO claimed he would use the metal pipe to incapacitate people and then slit throats with the machete and/or knife once a person was wounded by the pipe. The butane canisters are consistent with his prior stated plan; he stated multiple uses for them, such as to start a fire in a church(es) and then place the butane canisters in the fire to cause an explosion. MERCURIO stated he intended to incapacitate his father with a pipe, handcuff him, and use the firearms locked in the closet to attack a church.

102. The FBI made a probable cause arrest of MERCURIO on April 6, 2024. The evidence gathered during the investigation establishes that there is probable cause to believe that MERCURIO attempted to provide material support to ISIS. The facts gathered to date reveal that among other things, MERCURIO amassed a collection of items he intended to use to conduct an attack against a local church and its congregation, planned to violently assault his father with a metal pipe so he could steal a vehicle and firearms belonging to his father, pledged allegiance to ISIS, declared his own desire to be killed during his attack, and made arrangements to send his life savings to ISIS.

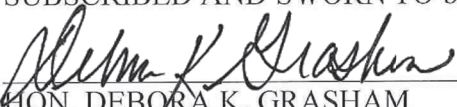
103. Based on the foregoing, there is probable cause to believe MERCURIO committed a violation of 18 U.S.C. Section 2339B, attempting to provide material support to ISIS, a designated foreign terrorist organization and your affiant respectfully requests the issuance of a criminal complaint and arrest warrant.

Respectfully submitted this 8th day of April, 2024.



JOHN H. TAYLOR II
TASK FORCE OFFICER
FEDERAL BUREAU OF INVESTIGATION

SUBSCRIBED AND SWORN TO before me on video this 8th day of April 2024.



HON. DEBORA K. GRASHAM
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF IDAHO