

INTAKE

NOV 15 2019 *AM*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

THOMAS OSADZINSKI

19CR 869
CASE NUMBER: **869**
MAGISTRATE JUDGE HARJANI
UNDER SEAL

CRIMINAL COMPLAINT

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

From in or around June 2018 through the present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2339B	Attempting to Provide Material Support and Resources to a Foreign Terrorist Organization

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

PHILLIP VIGGIANI
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: November 15, 2019

Judge's signature

City and state: Chicago, Illinois

SUNIL R. HARJANI, U.S. Magistrate Judge
Printed name and Title

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NOV 15 2019

MAGISTRATE JUDGE
SUNIL R. HARJANI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, Phillip Viggiani, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed since approximately January 2016. I am currently assigned to the Federal Bureau of Investigation's Joint Terrorism Task Force. As part of my duties as a FBI Special Agent, I investigate criminal violations relating to international terrorism, including the provision and attempted provision of material support or resources to terrorists and foreign terrorist organizations, in violation of Title 18, United States Code, Sections 2339A and 2339B. As part of my job, I have participated in the execution of multiple federal search warrants. In addition, I have conducted numerous investigations involving the use of the Internet, email and social media to further criminal activity.

2. This affidavit is submitted in support of a criminal complaint alleging that THOMAS OSADZINSKI has violated Title 18, United States Code, Section 2339B by attempting to provide material support and resources, namely services, to a designated foreign terrorist organization, namely, ISIS. This affidavit is also in support of a search warrant of 3950 N Lake Shore Drive #1315, Chicago, Illinois (the "Subject Premises"), a black Lenovo laptop computer ("the Subject Laptop"), and a black Samsung 8, assigned telephone number (847) 668-1888 and IMEI: 355989082182846 (the "Subject Phone," and collectively with the Subject Laptop,

the “**Subject Devices**”) for evidence and instrumentalities relating to this criminal conduct.

3. According to Illinois Department of Motor Vehicles records, THOMAS OSADZINSKI is 20 years old and his primary residence is at the **Subject Premises**. This has been confirmed by recent law enforcement surveillance and communications with CHS1, as described below. According to OSADZINSKI’s passport, he is a U.S. citizen who was born in Park Ridge, Illinois. Based upon records provided by a university, OSADZINSKI is currently a college student.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging OSADZINSKI with attempting to provide material support and resources to a foreign terrorist organization, and related search warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint and that there is evidence and instrumentalities of the charged offense contained within the **Subject Premises** and **Subject Devices**.

5. The statements in this affidavit are based on my personal knowledge, training, and experience, information provided to me by other law enforcement agents, my review of communications between OSADZINSKI and FBI Online Covert Employees (OCEs) and a Confidential Human Source (CHS1), as well as my review of publicly available information and other reports and records.

6. The OCEs and CHS1 have preserved online conversations with OSADZINSKI. In addition, in-person meetings between CHS1 and OSADZINSKI were recorded. The majority of the communications were in English but in the limited instances where Arabic words or phrases were spoken or written, the preserved conversations have been translated by FBI linguists and summarized in this affidavit in *Italics*. The summaries of the conversations do not include all statements made or topics covered during the course of the conversations. I based the summaries and the language quoted from the preserved conversations on my review of screenshots of the online conversations, draft transcripts prepared by FBI personnel, and audio recordings of in-person meetings. At various points in the affidavit, I also have included (sometimes in brackets) my interpretation of words and phrases used in the conversations. My summaries and interpretations are based on the context of the conversations, events occurring before or after the conversations, information received from the OCEs and the CHS, my knowledge of the investigation as a whole, my training and experience, and the training and experience of other law enforcement officers involved in this investigation.

SUMMARY OF THE INVESTIGATION

7. As described in more detail below, in or about and between June 2018 through November 2019, OSADZINSKI attempted to provide material support and resources, specifically services, including expert advice and assistance, to ISIS, a designated foreign terrorist organization. Specifically, OSADZINSKI designed a process that used a computer script that directed Social Media Platform 1 bots to copy and save ISIS official media content in order to help ISIS spread its message and make its materials more available to its supporters. This process sorted and categorized large volumes of official ISIS media content according to specified criteria, and copied it to other Social Media Application 1 environments created by OSADZINSKI, where they were preserved and could be more conveniently accessed and disseminated by other users. Without OSADZINSKI's script, the transfer of videos from one channel to another must be done manually, by copying each file individually. This process can take an extensive amount of time, depending on the media type, size, user internet speed and other factors. OSADZINSKI's script eliminated the need to perform these tasks manually.

8. Social Media Platform 1 and social media platforms routinely remove ISIS media content due to the violent nature of the content. ISIS and its supporters reproduce, save, and disseminate the group's propaganda material to as wide an audience as possible in order to recruit and inspire attacks against the United States and other Western countries. OSADZINSKI's script automatically and rapidly copies

and saves voluminous quantities of ISIS media content thereby enhancing the group's ability to store and share its propaganda online.

9. Further, OSADZINSKI's computer script preserved ISIS media content in a more organized format which allowed Social Media Platform 1 users to more conveniently access, consume, and disseminate the ISIS media content. For example, the defendant's computer script allowed consumers to choose media by resolution. Thus, people with slower internet connections could find and view lower resolution (smaller file size) videos and people with faster internet connections could find and view higher quality videos.

10. OSADZINSKI shared his script with individuals whom he believed to be ISIS supporters and members of pro-ISIS media organizations, but who were in fact OCEs and a CHS, and instructed them on how to use the script. In addition, OSADZINSKI stated that he wanted to teach other ISIS supporters to use the same preservation and copying process.

Social Media Platform 1

11. Based on my training and experience, I have learned that Social Media Platform 1 is a mobile and desktop messaging application. It can be used on smartphones, such as Apple iOS and Google Android devices, and on laptop and desktop computers, by users, to send messages and media to each other.

12. To sign up for Social Media Platform 1, a user must provide a phone number. Social Media Platform 1 verifies the phone number through a text message sent to the phone number. Social Media Platform 1 users can also select a username

but are not required to. Usernames are unique, meaning only one user can have a given username at one time. Specifically, usernames and display names can be changed at the discretion of the user, however, an account ID remains the same no matter the username. Social Media Platform 1 users can find other users by searching for the username or by using the known phone number of a user. However, users cannot view the phone number associated with a username, unless specifically allowed for by a given user's privacy settings. Users can also select a display name, such as a first and last name. Display names are not unique.

13. Social Media Platform 1 offers a variety of communication methods for its users, including individual as well a multi-user chat environments. Social Media Platform 1 further touts high quality encryption and communication security:

a. **Chats.** Users on Social Media Platform 1 can communicate with each other through chats. They can send each other text messages, photos, videos, any files, and make voice calls.

b. **Secret Chats.** Secret chats use end-to-end encryption, which means only the sender and recipient have the ability to view the content of the chats. These secret chats also disappear and can be set to self-destruct.

c. **Groups.** Social Media Platform 1 allows collections of users to communicate with each other in chat rooms called groups. Groups may be invitation only. Groups may be public or may be invitation only. Within groups you can interact within in the group and see whose account relates to who. Members are categorized as subscribers and only the administrator can post in the chat, often used as a location

for broadcasting to a larger number of subscribers, as well as giving the ability to cloak the identity of the poster. These rooms are not a forum for conversation.

d. **Bots.** Social Media Platform 1 further offers the use of bots, which are third-party applications which can be customized to perform a wide variety of tasks.

14. Individuals who post pro-ISIS media content frequently have their social media accounts suspended or deleted for violating terms of service. According to public announcements made by Social Media Platform 1, as well as its terms of service, Social Media Platform 1 prohibits, *inter alia*, the use of its service to send spam and promote violence. I understand that Social Media Platform 1 may remove publicly available content that promotes violence, but it does not remove private content.

The Islamic State Of Iraq And Al-Sham

15. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq, then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

16. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a 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 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also added the following aliases to the Foreign Terrorist

Organization listing: The Islamic State of Iraq and al-Sham (“ISIS,” which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the Foreign Terrorist Organization listing: Islamic State, ISIL, and ISIS.

17. On or about March 21, 2019, the Department of State amended the terrorist designations of the Islamic State of Iraq and Syria (ISIS) to include Amaq News Agency, Al Hayat Media Center, and other aliases, pursuant to Section 219 of the Immigration and Nationality Act, and as a Specially Designated Global Terrorist (SDGT) under Executive Order 13224. According to the State Department, Amaq News Agency and Al Hayat Media Center are two media wings of ISIS. Amaq News Agency is part of the terrorist organization’s propaganda apparatus, and is used for claiming responsibility for ISIS or ISIS-inspired attacks, spreading terrorist messages online, and recruitment. Al Hayat Media Center is ISIS’s multilingual media outlet and is also used for recruitment purposes.

18. To date, ISIS remains a designated Foreign Terrorist Organization.

19. According to the National Counter Terrorism Center (“NCTC”), Abu Bakr al-Baghdadi, who was killed on October 26, 2019, was the leader of ISIS. Further, according to NCTC, in April 2013, al-Baghdadi declared that his group was operating in Syria and changed its public name to the Islamic State of Iraq and the Levant.

20. Based on my training and experience, I am aware that ISIS and other FTO's have official "media" components that produce and disseminate official communications. For example, I know that the media components of ISIS have produced high quality videos in order to inspire others to commit violence in the name of ISIS, to recruit individuals to join ISIS, and to terrorize citizens living in the United States and other countries. ISIS's official media components include Al-Furqan Foundation for Media Production and its subsidiaries Al Itissam Media and Al Ajnad Media Foundation, Al Hayat Media Foundation, Al Bayan Radio, Al Naba and Amaq News Agency.

21. Based on my training and experience, I am aware that ISIS uses its respective "media" components to, among other things:

- a. Recruit fighters and other personnel including doctors, nurses, and engineers, among other roles and professions;
- b. Solicit donations and other financial support;
- c. Call for attacks in the West and against other governments and civilian populations deemed enemies of ISIS;
- d. Intimidate governments, private entities and civilians that do not share ISIS's violent jihadist philosophy; and
- e. Claim responsibility for terrorist attacks.

22. Based on my training and experience, I am also aware that ISIS members have used Social Media Platforms, video-sharing sites, blogs and other internet-based sites and applications to distribute their official communications

inexpensively, safely, and broadly. In addition, I am aware that ISIS and other foreign terrorist organizations use these online tools to communicate (publicly and privately) with sympathizers and potential recruits, and to distribute their respective messages to legitimate media outlets, in order to draw attention to the organizations, recruit new members, raise money and promote violent jihad, all in an effort to carry out the terrorism-related goals of the organizations.

Pro-ISIS Media Organization 1

23. Based on my training and experience, I know that Pro-ISIS Media Organization 1 is an unofficial pro-ISIS media organization that creates pro-ISIS media content, which it distributes online, including on Social Media Platform 1. Law Enforcement Agents have reviewed some Pro-ISIS Media Organization 1 content posted on Social Media Platform 1, which includes violent videos, instruction manuals on how to build Weapons of Mass Destruction, Improvised Explosive Devices, and chemical toxins for use against Western society.

Pro-ISIS Media Organization 2

24. Based on my training and experience, I know that Pro-ISIS Media Organization 2 is an unofficial pro-ISIS media organization. Law enforcement agents have reviewed some content produced by Pro-ISIS Media Organization 2, which includes media content promoting terrorist attacks in the West and detailing the use of biotoxins in conducting terror attacks.

25. Based on my training and experience, I know that Online Magazine 1 is an unofficial pro-ISIS magazine that aggregates content from multiple pro-ISIS media production groups including Pro-ISIS Media Organization 2. I have reviewed

issues of the Online Magazine 1 and its contents include promoting attacks against Western countries, specifically, the United States. Online Magazine 1 also contains original content solicited from readers such as opinion pieces, articles of support for ISIS, infographics promoting ISIS videos, and advocacy for terrorist attacks.

OSADZINSKI Communicated with OCE1

26. On or about June 6, 2018, OSADZINSKI, using Account 1,¹ posted in a Social Media Platform 1 pro-ISIS chatroom called "Weapons," a picture of instructions for manufacturing TATP. Based on my training and experience, I know that TATP is a highly unstable explosive used by terrorist organizations to commit attacks. OSADZINSKI asked if anyone in the chatroom had the video that went with the TATP instructions. OSADZINSKI and others in the chatroom discussed security measures to take while acquiring TATP ingredients and tips for handling explosives ingredients. Later in the conversation, OSADZINSKI described a video that was officially released by ISIS with English subtitles on how to make a chemical explosive in a kitchen.

27. On or about June 6, 2018, OCE1 responded to OSADZINSKI's post about TATP. After exchanging greetings, OCE1 sent OSADZINSKI a screen capture of the TATP instructions OSADZINSKI had previously posted in the chatroom. OCE1 warned OSADZINSKI to be careful with the TATP instructions, due to the instability of the ingredients. In response, OSADZINSKI stated that "i will be doing studying.

¹ On or about May 10, 2019, OSADZINSKI told CHS1 that Account 1 was the moniker he used on Social Media Platform 1.

yes. i think it will be some time before i try anything.”² Based on the content and context of this conversation and my conversations with OCE1, I understand that OSADZINSKI meant that it would be “some time” before he tried to commit an act of violence using the TATP instructions. OCE1 asked if OSADZINSKI was studying for school and OSADZINSKI replied “for jihad” and added a smiley face emoji. OSADZINSKI further stated that the “mukharabat” knew who he was and that “hijrah will be very hard.”³ Based on the context and content of the conversation and the FBI’s previous attempt to interview OSADZINSKI in March 2018, I believe OSADZINSKI meant that he thought the FBI was watching him.

28. On or about June 29, 2018, OCE1 reached out to OSADZINSKI to follow-up on the June 6, 2018 conversation. OSADZINSKI informed OCE1 that he had “to stay passive for now because of mukhabarat” watching him and that, he “can’t get in contact with the brothers. For now.” OSADZINSKI also said that [there is a] “slanderous rafid⁴ whore with American mukhabarat intelligence.... they have 5+ agents surveilling me.” OCE1 asked if OSADZINSKI could fight them, to which OSADZINSKI replied “if I must I will attain shahadah⁵ inshaAllah. i know a brother in contact with IS media department... if i do it there will be an isdar.”⁶ OCE1

² Quoted language is provided as originally written, without corrections for spelling and grammar.

³ Mukharabat is an Arabic term for state security and intelligence services. Hijrah is commonly used to refer to an individual’s journey to ISIS-controlled territory.

⁴ Rafid is an Arabic term which translates to ‘rejecter,’ and is often used by Sunni extremists as a pejorative epithet for Shi’ite Muslims.

⁵ Shahada is an Arabic term for the Muslim profession of faith. Based on the content and context of this conversation and my conversations with OCE1, I understand that OSADZINSKI meant Shaheed, which is an Islamic term for martyrdom.

⁶ Isdar is an Arabic term for a news announcement.

asked OSADZINKSI if he had weapons. OSADZINSKI replied that he had a sharp knife and that he knows “some brothers with guns but I prefer the kalashnikov⁷... any American employee will not be innocent...the agents who follow me...” OSADZINSKI went on to state that he knows a person that could get him a “glock17...9mm hollow tip FMJ armor piercing rounds.”⁸ Later in the same conversation, OSADZINSKI told OCE1, “I am doing a lot of reading...like explosive making...once I get my gun and explosive belt, the mukhabarat will never get me.”

OSADZINSKI Communicated with OCE2⁹

29. On or about February 7, 2019, the user of Social Media Platform 1 Account 2, later identified as OSADZINSKI¹⁰, contacted Pro-ISIS Media Organization 1. OCE2, who portrayed himself as a member of Pro-ISIS Media Organization 1, responded to the message. OSADZINSKI's contact was unsolicited, and at the time OSADZINSKI contacted the OCE account, OCE2 was unaware of OSADZINSKI's identity.

30. When OSADZINSKI reached out to Pro-ISIS Media Organization 1, OSADZINSKI identified himself as having previously written an article for Online

⁷ A Kalashnikov is an automatic rifle, more commonly known as an AK-47.

⁸ FMJ, or Full Metal Jacket, is a small arms projectile round.

⁹ The persona used by OCE2 was initially used by a CHS. Shortly after OSADZINSKI and the CHS began communicating, OCE2 took over the persona. For purposes of this complaint, the persona will be referred to throughout as OCE2.

¹⁰ On or about March 2, 2019, Account 2 sent OCE2 a link to a YouTube video. Based on physical surveillance and state issued identification, I am familiar with OSADZINSKI's appearance. I reviewed the video and recognize that the video shows OSADZINSKI performing shahada, or accepting Islam as his faith.

Magazine 1¹¹ titled “A Message of Inspiration to the Mujahideen: Fighting the American Crusader soldiers and their puppets”. OSADZINSKI requested to be added to a specific Pro-ISIS Media Organization 1 group.

31. On or about February 9, 2019, OCE2 told OSADZINSKI he would be added to the group of members for Pro-ISIS Media Organization 1. In response, OSADZINSKI sent a picture to OCE2 of two individuals embracing, with the ISIS flag in the top right corner, along with an ISIS flag with a heart graphic overlay.



OSADZINSKI Translated Pro-ISIS Articles

32. On or about February 10, 2019, OSADZINSKI told OCE2 in Arabic, “*I know English well. If you need help tell me...*” Based on my training and experience, and the context of the conversation, I believe OSADZINSKI was offering to help Pro-ISIS Media Organization 1 by translating from Arabic.

33. On or about February 13, 2019, OSADZINSKI told OCE2 that he was working with Individual 2, another ISIS supporter, who had asked OSADZINSKI to translate pro-ISIS videos from Arabic to English for Pro-ISIS Media Organization 2,

¹¹ I have reviewed issues of Online Magazine 1, which is self-described as an “unofficial magazine that aims at disseminating the spirit of interactions between the supporters of the Islamic Caliphate.” It includes jihadist propaganda and threats to the West. It also contains articles in Arabic and English. One issue states Online Magazine 1 is run by a group of Islamic State supporters and numerous pro-ISIS foundations.

and who OSADZINSKI described as “100% not mukhabarat.”¹² During a later conversation, on or about March 18, 2019, OSADZINSKI explained how he became involved with Pro-ISIS Media Organization 2, OSADZINSKI stated “I met [Individual 2] and they needed one english speaking brother. after we trusted each other then he gave me work to do and alhamdulillah I am part of it 1.5 years ago i met him.”

34. On or about February, 13, 2019, OSADZINSKI sent OCE2 links to a YouTube video titled, “ISIS operate freely in Iraq, and Security Forces unable to follow!!” and “TO THE CRUSADER STATE OF RUSSIA.” I have reviewed “TO THE CRUSADER STATE OF RUSSIA”. The video celebrated a deadly attack in Russia. OSADZINSKI told OCE2 that he had “presented translations to them.” Based on my viewing of the video, and the context of the conversation and comments made by OSADZINSKI, it is my understanding that OSADZINSKI had given translations of these videos to Pro-ISIS Media Organization 2.

35. On or about February 24, 2019, OCE2 asked OSADZINSKI if he still translated for Pro-ISIS Media Organization 2. OSADZINSKI responded “Yes, *thanks be to God.*” OSADZINSKI then sent OCE2 files containing translations of portions of a Pro-ISIS Media Organization 2 video called “Holding firm to the Pledge 2,” and stated, “I edited the translation for this one.” I have reviewed the video, which appears to have been produced by Pro-ISIS Media Organization 2, and consulted with FBI linguists. It contains footage of ISIS fighters, battle footage and includes an

¹² Individual 2 was not working for the United States government and was not acting at the direction of the United States government.

Arabic-language voiceover calling for ISIS fighters and supporters to stand together against the West. During the same conversation, OSADZINSKI said, “if you need any help I will help too”... “sometimes I am busy with school, but jihad is always more important than relaxing and games.”

OSADZINSKI Discussed Attacks

36. On or about March 2, 2019, OSADZINSKI talked to OCE2 about military recruiters and Selective Service Registration. OSADZINSKI advised OCE2 he would never be picked up for military service because he is on the “terrorist watch list...if they pick me...[eyeball emoji] [car emoji] [dynamite emoji].” Based on the context in which the emojis were used, I understand that OSADZINSKI meant that if he was ever drafted by the U.S. military, he would commit a car bombing attack.

37. During the same conversation, OSADZINSKI discussed Nidal Hassan, the Fort Hood shooter, with OCE2. OSADZINSKI stated “there was one Mujahid who did this...he joined the American army and killed 12 of them on their base.” OSADZINSKI subsequently sent a link to a Wikipedia article on the shooting. OSADZINSKI stated, “I keep thinking about it leaving the dunya¹³ is hard...I do jihad in media but the sword is the other part.” He also stated that he needed “the sword but I also want a wife and kids and to raise children that will be slaves of Allah...before I ever do istishadi.”¹⁴ OSADZINSKI concluded, “if they ever come to

¹³ Dunya refers to the temporal world, or life on earth, as opposed to the eternal spiritual realm.

¹⁴ Istishadi is a reference to martyrdom operations.

arrest me by Allah, I will make dawah¹⁵ with the sword. I will never go to their false man made court.” OCE2 asked for clarification from OSADZINSKI, and OSADZINSKI posted emojis of a knife and two crossed swords. OSADZINSKI stated, “In sha Allah it won’t happen but if Allah wills it, I will make the jihad.”

38. On or about March 4, 2019, OSADZINSKI spoke with OCE2 on Social Media Platform 1. OSADZINSKI asked OCE2 if he/she knew OSADZINSKI did the voice for Pro-ISIS Media Organization 2. OSADZINSKI then forwarded a video produced by Pro-ISIS Media Organization 2, titled “The Fighting Has Just Begun.” The video urges Muslims to “return the flames of war into the countries of aggressors” and includes a song urging the viewer to “go and answer the call, don’t spare none, kill them all, it is now time to rise, slit their throats watch them die.” In the video, a narrator is heard delivering commentary in English, which concludes with the following:

...To break the pride of the crusaders is an obligation until they follow the orders of the mujahideen¹⁶ and halt their aggression. We invite you, our muwahhid¹⁷ brother, to return the flames of war into the countries of the aggressors. Just as the planes of the crusaders burnt the homes of Muslim residents in Iraq and Sham,¹⁸ the Muslim in their lands will retaliate with an equivalent strike.

39. I have reviewed the video and the narrator speaks English with an American accent. Further, based on my training and experience and conversations with other law enforcement officers, I believe that the narrator used a voice

¹⁵ Dawah means to invite, call or summon another. The term is often used to describe when Muslims share their faith with others, and acts include charity and proselytization.

¹⁶ Mujahideen are Jihadist fighters.

¹⁷ A muwahhid is a person who witnesses to the oneness of God.

¹⁸ Sham is a historical term referring to the greater Syria region.

modulator to alter the tenor of his voice. The video was produced by Pro-ISIS Media Organization 2, and contained a montage of stock news footage, ISIS battle scenes and executions.

40. Immediately after sending the video to OCE2, OSADZINSKI stated, "I did the voice," referring to the English-language narrator, and that he had done voiceover work both for jihad and for the Islamic State.

41. Between March 24 and 30, 2019, OSADZINSKI sent OCE2 pictures and videos of himself using wires and tools to solder his airsoft pistol.¹⁹ OCE2 asked whether or not OSADZINSKI was building a bomb. OSADZINSKI replied "I want to learn how. I was fixing my gun."

42. On or about March 31, 2019, OSADZINSKI contacted OCE2 on Social Media Platform 1, where OSADZINSKI asked, "akhi. do you think you have a guide to make a detonator?" OSADZINSKI explained he wanted the guide because "I want to study it and practice making them so I know." OSADZINSKI expressed his concern over the use of acetone peroxide based explosives, stating "the acetone and peroxide ones. they are not safe, right? they can explode from heat and they become less powerful after a long time." OSADZINSKI further stated with regard to his own readiness to use such explosives, "I am thinking about it but I don't want to do martyrdom operation and I don't want to be caught in sha Allah... I saw Baghuz²⁰ and it made me hate this country. I can't sit in the chair while muslims are dying."

¹⁹ An airsoft gun is a realistic replica gun system that shoots plastic bullets using air power.

²⁰ Based on open source information, I know that Baghouz was an ISIS stronghold in Syria and was taken over by US, Kurdish and European Union forces in 2019.

Additionally commenting on the “mukhabarat” [security and intelligence services], OSADZINSKI stated, “and if I am ever caught they won’t arrest me. I will be a shahid²¹ before they ever capture me.” Based on my knowledge and experience, I believe OSADZINSKI meant that he would use violence against law enforcement officials, potentially resulting in his death, should they attempt to arrest OSADZINSKI.

OSADZINSKI Began Developing An Operating System for ISIS Supporters

43. On or about March 27, 2019, OSADZINSKI told OCE2 on Social Media Platform 1, “I will began a new and very valuable project I will be developing a custom gentoo linux²² version designed for ansar [ISIS supporters] it can run on any computer and will be very lightweight, fast, and secure.” Based on university records, I know OSADZINSKI has taken several collegiate level computer science classes, to include: Python for Programmers,²³ Information Systems, Applied Networks and Security, and Computer Science I and II.

44. OSADZINSKI then sent OCE2 a link to a group chat, stating, “I will post updates here for trusted brothers only.” OSADZINSKI clarified he was working on the project “by myself. It will be very secure, in sha allah it will only browse [Social Media Platform 1]. When there are less things installed the operating system is harder to hack.”

²¹ Islamic reference for martyr, or martyrdom.

²² Gentoo Linux is a free computer operating system that is a highly customizable version of Linux, and “Linux” is a free computer operating system, that provides a wide range of functionalities.

²³ Python is a computer programming language.

45. On or about April 10, 2019, OCE2 advised OSADZINSKI of the existence of a group planning an operation in the West, who needed assistance in translating instructions on how to manufacture explosives, and asked whether OSADZINSKI would be interested in helping. OSADZINSKI responded, "I will do it" and OCE2 provided contact information for OCE3 to OSADZINSKI.

OSADZINSKI Communicates with OCE3

46. On or about April 11, 2019, OSADZINSKI informed OCE3 he used a Linux-based version of Microsoft Word. OSADZINSKI told OCE3, "I love learning about computers akhi. theyre very useful for jihad."

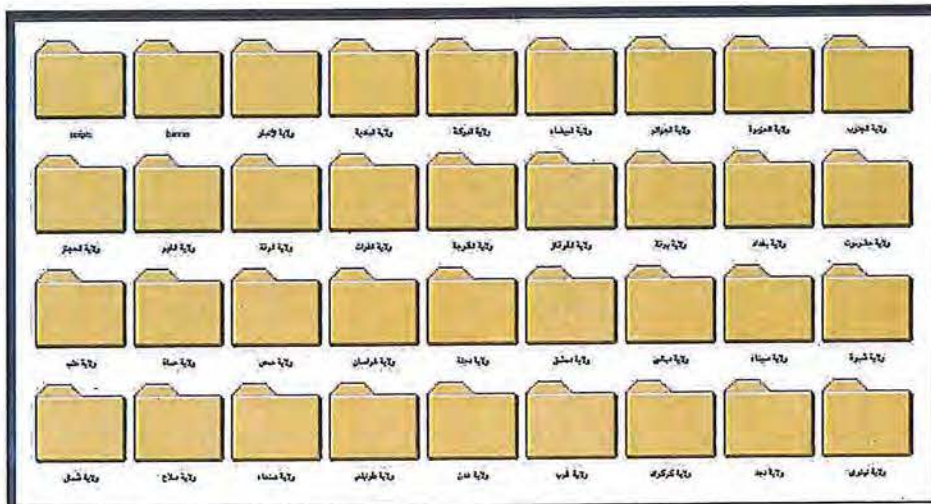
47. On or about May 1, 2019, OSADZINSKI and OCE3 discussed how OSADZINSKI could use his computer skills to help ISIS. OSADZINSKI sent OCE3 a video of OSADZINSKI's computer screen entitled "building the first version," which, based on the training and experience of knowledgeable law enforcement officers, appeared to depict a Linux-based Operating System (OS) under development. OSADZINSKI stated the OS would be "available for the ansar to use soon," and described certain technical specifications along with features which would distinguish it from other Linux-based systems and prevent exploitation by "crusader intelligence agencies." Based on the context of the conversation I understand "prevent exploitation by intelligence agencies" to mean that he was designing the operation system in a manner that would shield the operating system from law enforcement. OSADZINSKI added, "It is hard work and a lot of studying but bithnillah swt [Allah willing] I can make something useful." In the same exchange, OSADZINSKI further

advised OCE3 that in the meantime, OCE3 should use a specific operating system known for its security features along with other anonymization and encryption measures for any activity by OCE3 on [Social Media Platform 1]. OSADZINSKI further spoke about creating a guide for “trusted brothers.”

48. During the same conversation, OSADZINSKI sent OCE3 three different file versions of a video titled, “The Fighting has just begun,” described above, confirming in response to OCE3’s inquiry as to whether OSADZINSKI had contributed vocal narration to the video.

OSADZINSKI Described ISIS Media Project to OCE2

49. On August 7, 2019, on Social Media Platform 1, OSADZINSKI told OCE2 “[I] did make something...I forgot to show you,” and sent a screenshot depicting computer file folders labeled in Arabic with the names of various ISIS Wilayat.²⁴ OSADZINSKI said these are, “all *publications* from all wilayah.”



²⁴ Wilayah is Arabic for province, which OCE2 understood to be a reference to provinces of ISIS. According to my training and experience, Islamic State territory is organized into Wilayat. Official ISIS media publications are often labeled according to the particular province where the footage and/or content originated.

50. OSADZINSKI said "I made my own python scripts to organize everything," and sent a sample of computer code stating, "i coded this... it organizes the channels." OSADZINSKI then sent two Social Media Platform 1 channel invitations to OCE2. OSADZINSKI said the first channel was "original," which OCE2 understood to mean the channel had been created by someone else. OSADZINSKI characterized the second channel as [the] "channel I made with the script." OCE2 joined both channels and saw that the "original" channel ("ISIS Channel 1") contained a large volume of official ISIS media releases, including Al-Furqan media content, of various file sizes. OCE2 also observed that the High Definition (HD) versions of the ISIS video from ISIS Channel 1 were being quickly and automatically added to the channel OSADZINSKI "made with the script" ("ISIS Channel 2"). OSADZINSKI explained that all of the publications that the script was copying to ISIS Channel 2 were "HD only," adding he [OSADZINSKI] had "downloaded the entire channel [ISIS Channel 1] and organized it." OSADZINSKI further explained he had made an offline archive to house media content produced by official ISIS media outlets such as Al-Furqan and itsam. OSADZINSKI said he intended to "spread it everywhere." Based on my training and experience, I know itsam is in reference to the ISIS-associated Al-'tisam Media Foundation, and Furqan is in reference to the Al-Furqan Media Foundation.

51. On or about August 7, 2019, OCE2 and OSADZINSKI engaged in the following conversation regarding OSADZINSKI's python script:

OCE2: what you are going to do with the offline archive akhi?

OSADZINSKI: my internet speed is very fast

OSADZINSKI: spread it everywhere

OSADZINSKI: there are websites where kuffar [non-believer] can watch combat footage

OSADZINSKI: they like to watch dawla videos

OSADZINSKI: but they cant access them much

OSADZINSKI: so in sha Allah i will give them access

52. In the same conversation, OSADZINSKI and OCE2 discussed preserving and accessing ISIS media content:

OSADZINSKI: they like to watch combat footage

OSADZINSKI: i will send the PM [private message] for the torrent

OSADZINSKI: do you know torrent?

OCE2: oh ok. you gonna PM torrent link on sites like reddit?

OSADZINSKI: yes in sha Allah

OSADZINSKI: many people want them.. but reddit banned me before for posting dawla video

OCE2: i know torrent a little but not much.

OSADZINSKI : it makes it so nobody can take it down

OSADZINSKI: they can tell mukhabarat and mukhabarat can only watch

OSADZINSKI: they cannot stop it

OCE2: Alhamdulillah [Thanks be to God]

OSADZINSKI: because i use a VPN and the VPN never stops

OSADZINSKI: bithnillah amrika [America] cannot do anything

53. During the same conversation, when discussing operational security of the media content, OSADZINSKI stated, "i will also encrypt the files[,] so mukhabarat cannot read them[,] the media jihad will never end...now I am making as much jihad as possible."

54. During the same conversation, OSADZINSKI told OCE2 to use a program that securely deleted computer files:

"if you dont have encryption[,] download the program BleachBit[,] it can securely delete files ... because akhi let me tell you[,] when you delete a file in windows, and then it is in the recycle bin, and then you empty the recycle bin, the mukhabarat can still find that file[,] but if you delete the file with bleachbit, the program overwrites the part of your harddrive with 0 data[,] and the mukhabarat can never get it again[,] ansar [ISIS supporters] recommend this program if you use windows and dont use encryption[.]"

"Operation: Heralds Of The Internet"

55. On or about August 16, 2019, OSADZINSKI told OCE2 on Social Media Platform 1, "i will start programming what we need," and then provided a link to a Social Media Platform 1 chat room before stating, "I finished furqan and I am writing a document which teaches it." Based on my training and experience and conversations with OCE2, I believe that OSADZINSKI meant that he had finished copying materials produced by the Al Furqan Media Foundation and was creating a document that would teach others how to use OSADZINSKI's script.

56. On the same day, OSADZINSKI sent OCE2 a document titled "Operation: Heralds of the Internet." The document described in detail OSADZINSKI's plan to use his script written with the Python language that would sort, copy, organize, and redistribute large volumes of content from ISIS official media

and other pro-ISIS channels on Social Media Platform 1. In the document, OSADZINSKI described the purpose of *Operation: Heralds of the Internet*: “Intention/Niyyah: Bring people to Islam and teach everyone the transgressions of the Crusaders and how the Islamic State’s response to transgressions is self-defense.” The document included a list of “Priorities”: including “al-Furqan,” “al-I’tisam,” “Office of Media Productions for the Wilayat of The Islamic State,” “al-Himmah Office,” and “Nasheed channels.”²⁵ Based on my training and experience, al-Furqan,” “al-I’tisam,” “Office of Media Productions for the Wilayat of The Islamic State,” “al-Himmah Office” are official ISIS media outlets. OCE2 understood this list to include the locations of ISIS content OSADZINSKI planned to sort, copy and organize using his script. The document included screenshots of OSADZINSKI’s script along with detailed explanations of how the script operated. The document further explained how the computer script could be modified by others to export information for additional ISIS channels.

57. I have discussed OSADZINSKI’s document *Operation: Heralds of the Internet* with OCE2 and other law enforcement officials with relevant knowledge and experience who believe that the computer script and associated methodology described in *Operation: Heralds of the Internet* function as described by OSADZINSKI.

58. On or about August 16, 2019, after OSADZINSKI sent *Operation: Heralds of the Internet* to OCE2, he told OCE2, “this document is very complicated. it

²⁵ A nasheed is a “chant”, i.e., a work of vocal music popular throughout the Islamic world.

is for organizing channels. but copying channels is easy. and i will do a document for that on android. so brothers who dont have a computer can do it. it will be much neater.” Based on my training and experience and conversations with OCE2, I believe that OSADZINSKI was planning to create another tutorial document for copying and organizing channels on Social Media Platform 1 for pro-ISIS supporters who used Android cellular telephones.

59. During the same conversation, OSADZINSKI said “i am downloading the i'tisam channel and now i am almost done organizing the wilayah channel since i found a mistake i made, there was a old Furat Media channel and al-Hayat Media Center²⁶ channel. Almost all HD isdars. but i lost the brothers who made it.” OSADZINSKI characterized the importance of “Furat” and “Al-Hayat” media, by stating, “they are so important akhi because they are in English so people understand.”

60. OSADZINSKI went on to tell OCE2, “the channel was called ‘Martyrs’ and it has so much media from official dawla [ISIS] foundations.” OCE2 asked if OSADZINSKI had begun his previously described plan to disseminate ISIS media content to individuals on Reddit. OSADZINSKI stated, “very soon in sha Allah. that is what this is for.”

61. During the same conversation, OCE2 asked about the technical nature of OSADZINSKI's plans. OSADZINSKI stated, “yes akhi. i will make a guide for

²⁶ Al-Furat is an official ISIS media publication wing, and Al-Hayat is a reference to Al-Hayat Media which, as noted in paragraph 17, has been added to the Department of States' designation of ISIS as a foreign terrorist organization.

ansar [ISIS supporters] so they can do it themselves.” Based on my training and experience and conversations with OCE2, I believe OSADZINSKI was referring to creating a guide to teach other ISIS supporters how to use OSADZINSKI’s script.

62. On or about October 6, 2019, OSADZINSKI told OCE2:

yea I want to make a system so I don’t have to message any bot[s].
just copy channel links
it takes a lot of time and energy akhi
I pray Allah swt will give me the energy
to copy all of [pro-ISIS Online Organization’s] channels
and spread them everywhere on the internet
this is my current work akhi
in sha Allah you will see how many people it reaches...
I am bringing it to the west...
it’s easy to spread it in Iraq and Syria and all Arab countries
but in America they make sure nobody knows about Islam or jihad

63. During the same conversation, OCE2 asked OSADZINSKI how he came up with the idea. In response, OSADZINSKI said, “before I was Muslim I wanted to find dawla²⁷ videos but never could[.] its very good for dawah[.] the news lies about dawla videos and will never show it full[.] amin[.] I don’t know them too close but I love their work[.]I try to help them[.]”

OSADZINSKI Contacted OCE4

64. On October 2, 2019, OSADZINSKI, using Social Media Platform 1 Account 2, unsolicited, contacted a user account on Social Media Platform 1 operated by OCE4, who portrayed him/herself online as affiliated with another unofficial pro-ISIS online organization. OSADZINSKI said, “ahki, do you have English translated isdarat [publications] from the wilayah? I’m a munasir [supporter] and copy channels

²⁷ Dawla means ISIS – it is a shorthand reference to the Arabic title of the Islamic State.

and share.” OSADZINSKI sent a screenshot showing a Social Media Platform 1 channel that appeared to have been created by OSADZINSKI, titled “Channel with every isdar ever.” The channel appeared to contain 3,488 photos, 8,860 videos, 2,100 files, 3,457 audio files, 4 shared links, and 10 members.

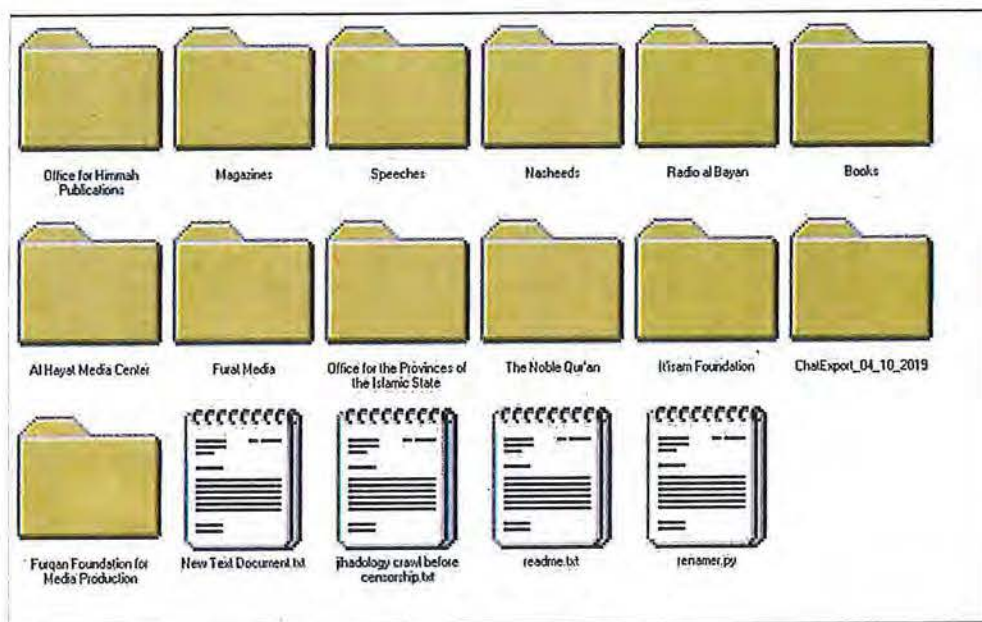
65. On or about October 3, 2019, OCE4 told OSADZINSKI a “brother” who knew computer code would contact OSADZINSKI on Social Media Platform 1. OCE4, posing as the “brother,” contacted OSADZINSKI from a separate user account on Social Media Platform 1 and inquired about the code which copied Social Media Platform 1 channels. OSADZINSKI instructed OCE4 to download the application Termux, what OSADZINSKI described as “a linux emulator.” Based on my training and experience and conversations with OCE4, I understand Termux to be an application that allows a user to run Linux tools on an Android device. I further understand that the “linux emulator” was necessary because OSADZINSKI used a Linux operating system.

66. During the same conversation, OSADZINSKI provided OCE4 detailed instructions on how OSADZINSKI employed a Python script connected to nine bots OSADZINSKI controlled to automatically duplicate and save ISIS propaganda on Social Media Platform 1. OSADZINSKI instructed OCE4 to use Termux to install Python and run the application. Once Python was installed, OSADZINSKI provided four Social Media Platform 1 bots for OCE4 to use for demonstration purposes. OSADZINSKI gave OCE4 directions on running Termux on an Android device. OSADZINSKI demonstrated how to pull the content from a channel and post all the

content into a blank channel. OCE4 watched the demonstration and observed the Python script automatically copying all the content from a channel containing 587 images, videos, text files, or audio files of Russian language ISIS propaganda and posting the content into a previously empty channel. According to OCE4, it took approximately four minutes to copy the content of the ISIS channel and repost it into the previously empty channel.

67. On or about October 3, 2019, in the same conversation, OSADZINSKI explained to OCE4 that the script is written in the Python programming language and was linked to approximately eight bots run by OSADZINSKI. OSADZINSKI explained "if you forward too many [messages] [Social Media Platform 1] can ban or restrict your account[,] but with this bot program [Social Media Platform 1] never bans." Based on my review of open source information and conversations with other law enforcement officers, as an anti-spam feature, I know that Social Media Platform 1 limits the number of messages a Bot may send to approximately 500 per minute. OSADZINSKI explained that because of this limitation, when the first bot reaches 500 messages, the Python script automatically rolls over to a second bot, and when the second bot reaches 500 messages, the Python script automatically rolls over to a third bot, and so forth. According to OSADZINSKI, the script rotates through a total of eight bots before starting again with bot one. By utilizing this Python script, OSADZINSKI is able to rapidly and automatically copy ISIS media channels on Social Media Platform 1 without being banned.

68. On or about October 4, 2019, OCE4 informed OSADZINSKI that OSADZINSKI's directions had enabled OCE4 to successfully install and use the script. Later in the conversation, OSADZINSKI sent OCE4 a screen capture of his computer with a picture of files showing ISIS material, including magazines, speeches, and videos taken from different locations online:



OSADZINSKI stated the files contain over 700GB of material, and that he had “download[ed] all and organize[d].”

The Subject Premises and Subject Devices

69. On or about February 13, 2019, CHS1,²⁸ an individual from the information technology field who had previously met OSADZINSKI in connection with OSADZINSKI's computer science studies, called the **Subject Phone** and spoke with OSADZINSKI about computer programming opportunities. Thereafter, CHS1

²⁸ CHS1 has been an FBI source since 2013 and has been paid approximately \$350,000. CHS1 has been involved in multiple FBI investigations, and the information provided by CHS1 has proven to be reliable and credible.

and OSADZINSKI developed a friendly relationship. Over the course of the relationship, CHS1 let OSADZINSKI know that CHS1 was an ISIS supporter.

70. Over the course of several months, CHS1 and OSADZINSKI met in person on approximately five occasions. Between meetings, CHS and OSADZINSKI communicated over **Subject Phone** and on Social Media Platform 1. During the course of their meetings and correspondence, OSADZINSKI and CHS1 shared pro-ISIS nasheeds and made statements consistent with their support for ISIS.

71. Based on my training and experience, I know that Social Media Platform 1 can be used via a mobile and desktop messaging application. Further, I know that users of Social Media Platform 1 typically use the application on their mobile devices. As described below, CHS1 has observed Social Media Platform 1 mobile application on **Subject Phone** during a meeting with OSADZINSKI.

72. On or about May 9, 2019, OSADZINSKI and CHS1 discussed, among other things, video gaming, OSADZINSKI's upcoming travel to meet his fiancé in Indonesia and the mujahideen in Dawla. On the same day, OSADZINSKI discussed his research of an FBI agent who had previously attempted to interview OSADZINSKI in March 2018. OSADZINSKI told CHS1, "So the FBI Counterterrorism Division started harassing me and my family...they said for internet activities." OSADZINSKI then told CHS1, "It's not counterterrorism, listen these people they don't have any bond for the Islamic community. They don't have any work being a police officer. They got the job, they got the job because [the agent's] dad was a politician. This Agent and then that was in 2016 right after Trump got

elected, March 2016. So [the agent] doesn't even have the job for [the agent's] qualifications, just because it's a politician. They're not good at counterterrorism." CHS1 then asked OSADZINSKI to clarify what he meant, to which OSADZINSKI stated, "[T]he agent's dad....The agent that follows me and like tries to...Yeah, FBI!"

73. On or about August 21, 2019, OSADZINSKI and CHS1 met in person in Chicago, Illinois. During the meeting, OSADZINSKI provided his Social Media Platform 1 moniker to CHS1. Later that day, OSADZINSKI sent CHS1 Social Media Platform 1 links to ISIS media content channels. At the end of the meeting, OSADZINSKI invited CHS1 to a series of six channels on Social Media Platform 1, ranging from "wilayah isdar," "itisam," "al-furqan," "speeches," "magazines," and stated, "these channels are all owned by me akhi, share with anyone you trust." OSADZINSKI then sent CHS1 a screenshot of the Python script he used to archive ISIS content into self-managed channels, and said "preview of copying a big channel with the script the brothers made." Based on a visual examination of the Python script by OCE2, OCE4, and FBI Agents familiar with the Python script, the Python script OSADZINSKI sent to CHS1 appeared to be the same script OSADZINSKI sent to OCE2 and OCE4. Based on my training and experience, I know that this script runs on electronic devices like the **Subject Devices**. CHS1 asked OSADZINSKI if he acquired all these videos himself, to which OSADZINSKI replied, "some brothers made them all and I just copy them. But I did modify and sort them to 360p versions only so I can upload a full .rar²⁹ to archive."

²⁹ A .rar file is a data container that stores one or more files in a compressed form.

74. On or about August 29, 2019, OSADZINSKI, using **Subject Phone**, sent CHS1 a photograph of a large poster containing Arabic written words over what appears to be Quranic verses via a messaging application. OSADZINSKI stated, "...I printed this beautiful poster at the university library."



Based on my conversations with FBI linguists, I understand the Arabic words in the poster translate to "al-Jihad." A desktop computer, similar in appearance to the one contained in paragraph 76 below, is visible in the photograph, next to a printer. The photograph appears to be taken from a high floor and with adjacent high rise buildings visible. The contents of the photograph, including the elevation, are consistent with one taken from the **Subject Premises**, which is on the 13th floor of an apartment building in Chicago.

75. On or about October 8, 2019, CHS1 and OSADZINSKI met in person in Chicago, Illinois. OSADZINSKI brought the **Subject Laptop** and the **Subject**

Phone to the meeting. During the meeting, CHS1 observed the Arch Linux operating system on the **Subject Laptop**. OSADZINSKI briefly showed CHS1 the password for the computer, which he kept on a piece of paper in his wallet. OSADZINSKI claimed he would swallow the piece of paper if caught by authorities. OSADZINSKI told CHS1 he runs the Python scripts for *Operation: Heralds of the Internet*, as well as the videos he distributes on his desktop computer at the **Subject Premises**. OSADZINSKI also told CHS1 that he uses the **Subject Laptop** for his computer science classes.

76. On or about October 10, 2019 CHS1 and OSADZINSKI met in person in Chicago, Illinois. OSADZINSKI brought the **Subject Laptop** to the meeting and showed CHS1 how to download the necessary software. OSADZINSKI also showed CHS1 how to operate the Python script on the **Subject Laptop**. CHS1 was able to successfully run the Python script on CHS1's computer. During this meeting, OSADZINSKI sent updated versions of the Python script and other data to CHS1. OSADZINSKI also brought the **Subject Phone** to the meeting. OSADZINSKI showed CHS1 how OSADZINSKI would edit the video quality of ISIS videos he disseminates using the **Subject Phone**. OSADZINSKI indicated the original Python script came from another ISIS supporter and that he edited the Python script to perform his ISIS preservation project. OSADZINSKI told CHS1 he had been sending screenshots with instructions for using the Python script to individuals in Chechnya to use. OSADZINSKI discussed with CHS1 a new project OSADZINSKI was working on using a Python script to copy and organize high quality ISIS videos. OSADZINSKI

also discussed posting ISIS videos to Reddit through a random "kuffar," or non-believer, with the intent to spread ISIS videos without being detected by law enforcement. OSADZINSKI believed the "kuffar" posting the videos on his behalf was likely to be arrested. CHS1 understood that OSADZINSKI wanted non-ISIS supporters to look at ISIS material online, which would cause law enforcement to investigate the non-supporters, instead of ISIS supporters. OSADZINSKI believed he will not be detected because he used The Onion Router (TOR), a program that anonymizes its users. OSADZINSKI told CHS1 that he took additional steps to obscure his internet traffic by using VPN services.

77. During the same meeting, OSADZINSKI told CHS1 that he believed his project to preserve ISIS content was the "highest form of jihad." OSADZINSKI informed CHS1 that "no more than ten brothers know how to do this kind of [media] jihad." During the meeting, CHS1 observed Social Media Platform 1 on **Subject Phone**.

78. At the conclusion of the October 8 and October 10 meetings, CHS1 drove OSADZINSKI to the **Subject Premises**. CHS1 observed OSADZINSKI return to the **Subject Premises** with the **Subject Laptop**.

OSADZINSKI Sent OCE4 a Picture of the ISIS Flag

79. On or about October 23, 2019, OSADZINSKI and OCE4 discussed a specific Social Media Platform 1 channel that supports ISIS. OSADZINSKI told OCE4, “ma sha Allah wait let me make a picture for you to post [on the channel].” OSADZINSKI then sent OCE4 an image of an ISIS flag in front of a computer monitor with Social Media Platform 1 channel [redacted] open on the computer screen and displaying an ISIS flag on the channel.



Based on the context in which the picture was sent and the image of a computer monitor in it, I believe that OSADZINSKI took this picture at a desktop computer in the **Subject Premises**.

80. During the same conversation, OSADZINSKI asked OCE4, “if you know a brother who can write Arabic let me know,” OSADZINSKI sent an Arabic phrase

meaning, "The Islamic State of the Caliphate... Soon Allah willing." OSADZINSKI stated he intended to photo-shop the phrase onto a separate image, and sent OCE4 an image of Trump Tower, in downtown Chicago, Illinois, and then deleted the image. OSADZINSKI stated he would post this image in his own channel on Social Media Platform 1.

OSADZINSKI Swore Allegiance To The New ISIS Leader

81. On or about November 2, 2019, OSADZINSKI, unsolicited, sent OCE4 an image of an ISIS flag with a handwritten note that stated, "I RENEW MY PLEDGE TO ABU IBRAHIM AL-HASHIMI AL-QURASHI, IN THE LAND OF AMERICA."



82. Based on open source information, in November 2019, ISIS announced Abu Ibrahim Al-Hashimi Al-Qurashi as the new leader of ISIS, following of death of

the prior leader, Abu Bakr al-Baghdadi. OSADZINSKI then stated “mine akhi. The brother didn’t post it in the bayah channel[].”³⁰

CONCLUSION

For the reasons stated herein, there is probable cause to find that THOMAS OSADZINSKI attempted to provide material support or resources to ISIS, in violation of Title 18, United States Code, Section 2339B. Further, there is probable cause that evidence and instrumentalities relating to this criminal conduct will be found in the **Subject Premises** and on the **Subject Devices**.

FURTHER AFFIANT SAYETH NOT.

Phillip Viggiani
Special Agent,
Federal Bureau of Investigation

SUBSCRIBED AND SWORN
before me on November 15, 2019.



Honorable SUNIL R. HARJANI
United States Magistrate Judge

³⁰ Based on my training and experience, I know that “bayah” is a term for the oath of allegiance sworn by ISIS members to its leader.