

UNITED STATES DISTRICT COURT

for the

District of Massachusetts



United States of America
v.

ARAM BRUNSON

Case No.

1:24-mj-8504-PGL

Defendant(s)

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 Jan. 2, 2023-Aug. 20, 2003 in the county of Suffolk in the District of Mass., and elsewhere, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC §1001(a)(2)	False Statements
18 USC §1001(a)(1)	Falsifying, concealing, and covering up a material fact by trick, scheme, or device

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Thomas M. Dalton

Continued on the attached sheet.

Thomas M. Dalton /by Paul G. Levenson

Complainant's signature

Thomas M. Dalton, Special Agent, FBI

Printed name and title

Attested to by the Complainant by telephone in accordance with the requirements of Fed. R.Crim. P. 4.1.

Date: 08/27/2024

Paul G. Levenson
Judge's signature



City and state: Boston, Massachusetts

Hon. Paul G. Levenson U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Thomas M. Dalton, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed for more than twenty-seven years. Prior to my employment with the FBI, I served as an officer in the U.S. Army for seven years. My service as a Special Agent with the FBI began in 1997 in the FBI’s Kansas City Field Office. Since January 2013, I have been assigned to the FBI’s Boston Field Office where I am currently assigned to a counter-terrorism squad. Among other things, I am responsible for conducting national security investigations and investigations into violations of federal criminal laws, including violent crimes and threats. I have conducted investigations as a member of the Boston FBI’s Joint Terrorism Task Force for approximately eight years. During my career, I have been the affiant on numerous affidavits in support of both search warrants and criminal complaints in the District of Massachusetts and elsewhere. I have executed arrest warrants and search/seizure warrants, utilized confidential human sources, interviewed victims/witnesses, and conducted surveillance of suspects. I have also conducted federal investigations involving computers, cell phones, the internet, interstate commerce, and firearms violations.

2. This affidavit is submitted in support of a criminal complaint charging ARAM BRUNSON (“BRUNSON”) (YOB 2003) with making a false statement in violation of 18 U.S.C. § 1001(a)(2), and engaging in a scheme to conceal in violation of 18 U.S.C. § 1001(a)(1) from on or about January 2, 2023, to on or about August 20, 2023. As detailed below, BUNSON provided false information to one or more law enforcement officials. BRUNSON also engaged

in a scheme to conceal his efforts to develop bomb-making skills and construct an explosive device.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement personnel, first responders, and other witnesses. Where statements of others are set forth in this affidavit, they are set forth in sum and substance and not verbatim. The events described in this affidavit occurred on or about the dates and times provided herein. This affidavit is intended to show merely that there is sufficient probable cause for the issuance of a complaint charging BRUNSON with violations of 18 U.S.C. §§ 1001(a)(1) & (2).

The Defendant

4. At the commencement of this investigation in January 2023, BRUNSON was 19 years old, enrolled at the University of Chicago in Chicago, Illinois as a sophomore, and had a permanent residence in Newton, Massachusetts where he was raised. BRUNSON is of Armenian descent, speaks fluent Armenian (as well as other languages), had lived in the Republic of Armenia during the summer of 2022, and had a deep knowledge of, and connection with, the history of the Armenian people. As the investigation later revealed, BRUNSON aspired to follow in the footsteps of “fedayi” -- Armenian armed militia members who sought Armenian independence and “Armenian Justice” through armed struggle. In particular, BRUNSON sought to assist the violent struggle of ethnic Armenians living in contested territory in Azerbaijan, and to address historical wrongs committed against ethnic Armenians.

BRUNSON Ignites a Black Powder Device in Chicago

5. On or about January 2, 2023, at approximately 4:07 p.m., the Chicago Fire Department (“CFD”) was notified of a fire on the 6th floor of a University of Chicago residential building at 1156 E 61st Street, Chicago, Illinois 60637. Alarms in the building had sounded and the building was in the process of being evacuated. The CFD responded to the scene and located the fire in Room N623. Room N623 was a single-occupancy room assigned to BRUNSON (“BRUNSON’s Room”), on the sixth floor of a residential tower within Woodlawn Commons. Woodlawn Commons housed approximately 690 domestic and international students, as well as professional staff and their families and children.

6. When the CFD arrived, there was smoke in the sixth floor hallway. When they entered BRUNSON’s Room there were both smoke and flames. The CFD also noted the presence of a suspicious white powder and a smell of incendiary chemicals not ordinarily present in a dormitory room. BRUNSON was not present in his room nor in the hallway when the CFD arrived. CFD extinguished the fire, and called the Chicago Bomb Squad (“CBS”) to investigate.

7. Both the CBS and FBI Special Agent Bomb Technicians (“SABT”) responded to BRUNSON’s Room. Emergency personnel found in the room approximately two pounds of potassium nitrate, one pound of charcoal, several grams of sulfur, and several bottles of isopropyl alcohol. In addition, emergency responders saw a container with soot residue near the location of the extinguished fire. The chemicals found in BRUNSON’s Room were consistent with the

fabrication of black powder, a type of “energetic material,” used in some ammunition and as a propellant in fireworks, among other things.¹

8. Two students who lived on the same hallway as BRUNSON separately reported hearing an explosion and having plaster knocked off the walls in their rooms before the fire alarm sounded. Both also reported seeing smoke fill the hall immediately outside BRUNSON’s room. One of the witnesses also saw BRUNSON leave the building with other students after the fire alarm sounded. That same student had seen BRUNSON earlier that morning entering and leaving a common bathroom on the dormitory hallway. After BRUNSON left the bathroom, the student observed a soot-like black substance on the bathroom floor and sink. The student also saw that black substance on the carpet outside BRUNSON’s room that morning.

Brunson Lies to the University of Chicago Police

9. BRUNSON had not reported the fire to the CFD or University of Chicago officials, nor was he present when the CFD responded. As a result, between approximately 4:45 pm and 5:45 pm on January 2, 2023, a University of Chicago Police officer called BRUNSON on his mobile telephone. The officer asked BRUNSON if he was ok and BRUNSON replied, “Yes I am, I’m just a little nervous.” BRUNSON falsely stated that he was cooking on a hot plate, which he knew he was not supposed to have in his room, and a small fire started. He said he panicked, ran out of the room, and left the building. BRUNSON told the officer he was at a friend’s house. The officer directed BRUNSON to return to the dormitory. BRUNSON replied that he was on his way and would be there in a little while. In a subsequent call initiated by University of Chicago Police

¹ Energetic material is a class of material that can release chemical energy stored in their molecular structure. Upon external stimulations, such as heat, shock, or electrical current, these materials will emit energy in a short time.

after BRUNSON failed to return to the dormitory, BRUNSON stated that his mother told him not to say anything to anyone else. He did not return to the dormitory for several hours.

Brunson Conceals His True Interest in Making Black Powder

10. Just before midnight on January 2, 2023, BRUNSON and BRUNSON's mother appeared at the dormitory building. FBI agents interviewed BRUNSON in the presence of his mother in a conference room. During the interview, BRUNSON changed his story about what started the fire in his room. BRUNSON said that he was building a "flare" in his room based on techniques he learned from a YouTube video. He said the flare was larger than he thought it would be, but this was the first time he attempted to create one. BRUNSON said he had not planned to cause damage to his room or hurt anyone. He said his purpose in experimenting with black powder was to replicate this flare during a weekend trip with friends at a cabin outside Boston, Massachusetts. BRUNSON showed agents a YouTube video titled "25 Pounds of Black Powder vs. iPhone 7 EXPERIMENT!," that he claimed he had previously researched on his electronic devices, suggesting that his plan was only to mimic an Internet prank. That video shows an individual incinerating an iPhone with black powder to determine if the iPhone will continue to function.

11. While BRUNSON admitted to FBI agents that he purchased the materials to make black powder from Walmart, BRUNSON said nothing to agents about the fact that he attempted to conceal his identity in making the purchase of sulfur powder and potassium nitrate used in the black powder. Subsequent investigation has revealed that BRUNSON used a false name in ordering those items. In addition, BRUNSON concealed from agents his ongoing interest in

making explosive devices for the purpose of assisting in Armenian nationalist causes, and also for teaching others how to make such devices.

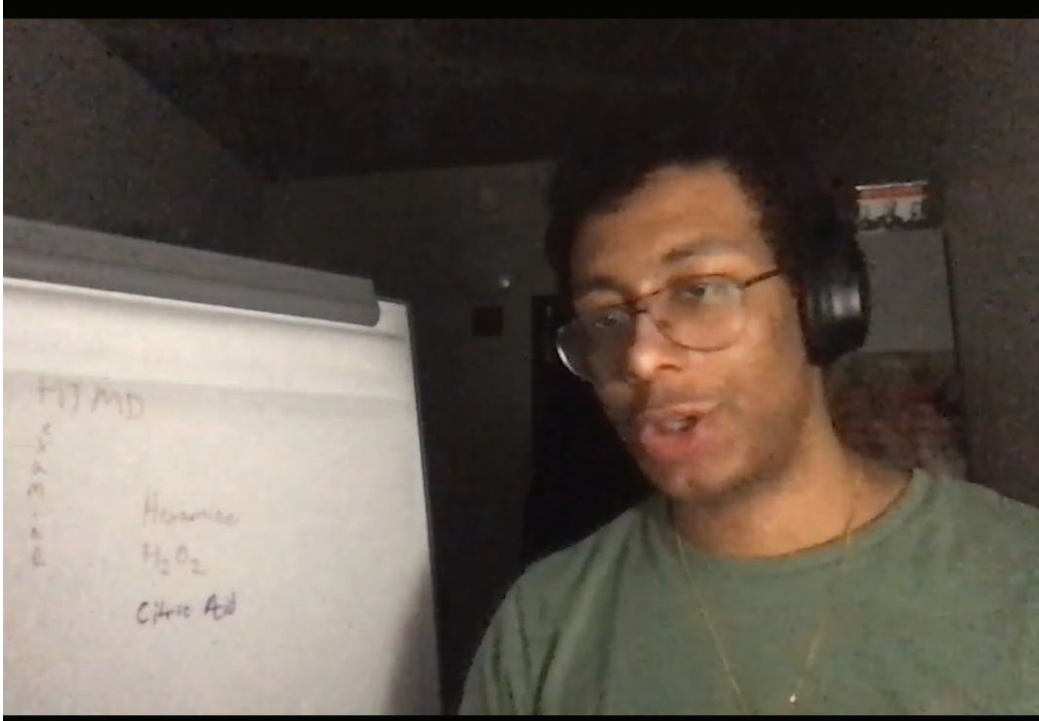
Brunson's Armenian Bomb Building Videos

12. Shortly after their interview with BRUNSON, agents obtained a search warrant to search the contents of a laptop found in his dormitory room. A review of the laptop revealed no search history reflecting that BRUNSON searched for, or downloaded, the prank video "25 Pounds of Black Powder vs. iPhone 7 EXPERIMENT!," or any communications suggesting he was planning a black powder prank with friends at a cabin in Massachusetts. However, among other things, the laptop contained approximately 10 videos in which BRUNSON is the narrator discussing how to form, fund and arm a revolutionary group. The videos appeared to be made in May 2022, months before the explosion in his University of Chicago dormitory room. Among other things, the videos show BRUNSON in front of a whiteboard lecturing as if he is an expert in these topics, and plainly seeking to assist Armenian speakers in the formation and operation of an armed militant terrorist organization. In the videos he discusses appropriate names for revolutionary and terrorist organizations, their internal structures and rules, and how such operations should be funded. He suggests that the acquisition of bombs and other weapons is expensive and difficult, and that lawful funding sources (such as membership dues) would be insufficient to meet the costs of acquiring arms. He then proposes that funding for weapons be obtained by selling narcotics or committing robberies.

13. Significant portions of the videos are focused on arming terrorist/revolutionary groups. BRUNSON advocates the use of bombs as the weapons of choice. He discusses the acquisition of bombs from illegal sources and the difficulty of transporting them across borders. He then discusses the advantages and disadvantages of constructing different types of bombs.

Using a whiteboard to assist in his lectures, BRUNSON wrote “high explosives,” and “HTMD” [*sic*], “Semtex,” and “C2,” while discussing each in turn. Semtex and C2 are common plastic explosives.

14. With regard to “HTMD” [*sic*], BRUNSON discusses the chemical make-up of hexamethylene triperoxide diamine (better known as “HMTD”), and explains how the ingredients are few and readily available. However, he also explains that HMTD is a very volatile substance and is particularly dangerous to work with and to transport. He notes that new chemists or terrorists could lose their fingers and even their lives in making devices with HMTD. He notes at one point that he had started ordering the compounds which made up HMTD, but ultimately concluded that the danger of devices made with HMTD outweighed the ease of making such a device. On the whiteboard, he crosses out “HTMD” [*sic*], and goes on to talk about more stable explosives. Ultimately, he suggests that hand grenades are the preferable explosives. He describes how a desk can be booby-trapped with a grenade and tripped by someone opening a drawer. Similarly, he describes how a door could be rigged with a grenade and how to place the grenade for maximum injury to the person triggering it. At the end of one of the videos, Brunson states (translated from Armenian), “I cannot say that the pistol does not have any use. It has a big use. But I think that now it is the age of bombs. It is the times of the bombs, because it is very easy to use, and I think that it is already the time for the grenade.”



Brunson Discussing How to Formulate the Explosive HMTD



Brunson Discussing How to Rig a Door with a Grenade

15. BRUNSON also discusses in his videos potential targets for assassination. He names a former Azerbaijani military official, and several political figures in Azerbaijan as appropriate targets. BRUNSON also stresses that the Armenian language should be used by aspiring terrorists and revolutionaries. He noted, “the language of terrorism is Armenian, not English,” because intelligence agencies will find it more difficult to monitor communications in Armenian. He said that an infamous group of Armenian American revolutionaries were caught because they spoke in English instead of Armenian. Notably, his bomb-making videos are in Armenian.

16. The search of his laptop also showed that BRUNSON conducted Google searches for items that could be used to build a bomb including searches for pipes, pipe plugs, and drills. For instance, several days before he made the video tutorials discussed above, BRUNSON searched for “how does a pipe bomb mailbox work.” BRUNSON also searched for and purchased the “Department of the Army Improvised Munitions Handbook.” The Army Improvised Munitions Handbook is a technical manual intended for the U.S. Army Special Forces which describes the manufacture of various types of ordnance from readily available materials, junk piles, common household chemicals and supplies purchased from common retail stores. Among other things, that manual contains instructions on how to make black powder and HMTD.

17. Agents also obtained a search warrant to search the contents of BRUNSON’s mobile phone seized by the CPD shortly after the fire on January 2, 2023. Among other things, on February 2, 2022, Brunson sent a text message to an unidentified individual conveying his desire to join a “fedayis.” According to open-source materials Armenian Fedayis historically were ethnic Armenians who formed self-defense units and irregular armed bands, with the aim of using force to defend Armenians from Ottomans and others, and creating an independent Armenian state.

18. During WhatsApp conversations in the fall of 2022, BRUNSON and two other close friends (referred to herein as “Individual A” and “Individual B”) who were also ethnic Armenians and interested in the Armenian struggle in the disputed territory in Azerbaijan, messaged about their desire to create a militia-type camp for strategy, living, practice, and tactical/military training. BRUNSON and Individuals A and B referred to themselves as “The Cell.” Subsequent investigation revealed that BRUNSON and Individual A unsuccessfully sought military training while on a trip to the disputed territory in Azerbaijan in the summer of 2022. Moreover, during the summer and fall of 2022, BRUNSON and Individual A made inquiries about where to obtain weapons training in the United States or abroad.

19. Less than one month prior to the January 2, 2023, incident, BRUNSON and Individuals A and B discussed their collective desire to obtain bomb training. Potential foreign locations for obtaining such training included Northern Ireland, Lebanon, and Iraq. During this conversation, BRUNSON suggested that getting bomb training in the United States was possible, “[d]epend[ing] on what you’re trying to make.” BRUNSON also noted that books on bomb making, “are pretty easy to access,” but noted that obtaining the materials to construct some bombs would be difficult.

20. A review of BRUNSON’s phone and related telephone records showed that BRUNSON was on the telephone with Individual B when he was making the black powder. Shortly after the fire was detected he was on the telephone again first with Individual B and then, a bit later, with Individual A. Text messages reveal that they sought to set up a group call. After BRUNSON had departed the scene of the fire, without notifying police or emergency services, Individual A messaged BRUNSON about going over a plan. Several hours after the fire,

BRUNSON messaged Individuals A and B, telling them to stop communicating with him as he is about to return to the scene of the fire to speak with law enforcement. In the hours after the dormitory room fire, BRUNSON also instructed Individuals A and B to delete communications which could be incriminating.

21. A review of BRUNSON's computer and phone also shows that throughout 2022, BRUNSON conducted searches for locations of Turkish and Azerbaijani diplomatic facilities both within the United States and abroad, including Boston and Washington D.C. Among his searches in December 2022 were: "residence of the Ambassador of Azerbaijan" and "residence of the Turkish Ambassador." Intermixed with these diplomatic facilities searches are searches for building access and grappling hooks. BRUNSON also conducted searches related to firearms, including laws related to handguns, sites which sold firearms, and the location of gun ranges. Relatedly, the week before he set off the black powder device in his dormitory room, BRUNSON conducted the following search, "if you shoot someone whos [*sic*] inside an embassy from outside of the embassy what country do you go to jail in." Additionally, BRUNSON searched for historical bombings that were carried out by the Armenian Revolutionary Federation (ARF) of diplomatic facilities in the United States and abroad. Open-source reporting links the ARF and associated sub-groups to bombings within the United States in the 1970s and 1980s in response to the Armenian genocide and related Armenian nationalist causes.

22. On November 11, 2022, BRUNSON sent a text message to Individual B stating that he was sworn into the ARF. Subsequent investigation confirmed that he was inducted into the Chicago branch of ARF, and that the ceremony was performed over a firearm. Brunson also

shared a photo of a bullet with the numbers 11/11/22 on it that he had been given by the ARF when he was inducted. This bullet was found in BRUNSON's Room after the explosion:



***BRUNSON Sets off Logan Airport Bomb Detection Machine,
Continues to Conceal Bomb-Making Efforts***

23. After the explosion in his dormitory room, BRUNSON left the University of Chicago, and moved back in with his parents at the family home in Newton, Massachusetts. That was his primary residence from on or about January 2023, until August 20, 2023.

24. On August 20, 2023, BRUNSON was scheduled to fly out of Boston Logan International Airport to Paris with an onward connection to Yerevan, Armenia. On August 20, he was traveling with his grandmother and a female family friend.

25. After BRUNSON and his traveling companions checked their bags, the luggage was screened by Transportation Security Administration ("TSA") officials. TSA officials swabbed exterior portions of one bag checked by BRUNSON for explosive materials, and it set off an alarm which indicated the presence of HMTD. In addition, in a second bag checked to one

of BRUNSON's travelling companions, but plainly containing items owned by BRUNSON, a used pair of men's dress shoes were swabbed for explosives and set off an alarm on a second testing machine which also indicated the presence of HMTD.²

26. BRUNSON was interviewed by Department of Homeland Security U.S. Customs and Border Protection ("CBP") officials at Boston Logan International Airport after he had checked in. After BRUNSON answered questions about his travel plans, he was told by CBP that his luggage tested positive for an explosive material. BRUNSON falsely denied ever handling a firearm or explosive. BRUNSON also falsely denied ever being in a place where firearms or explosives were used or handled. BRUNSON also falsely claimed to have no reason to know why his belongings would test positive for explosive material.

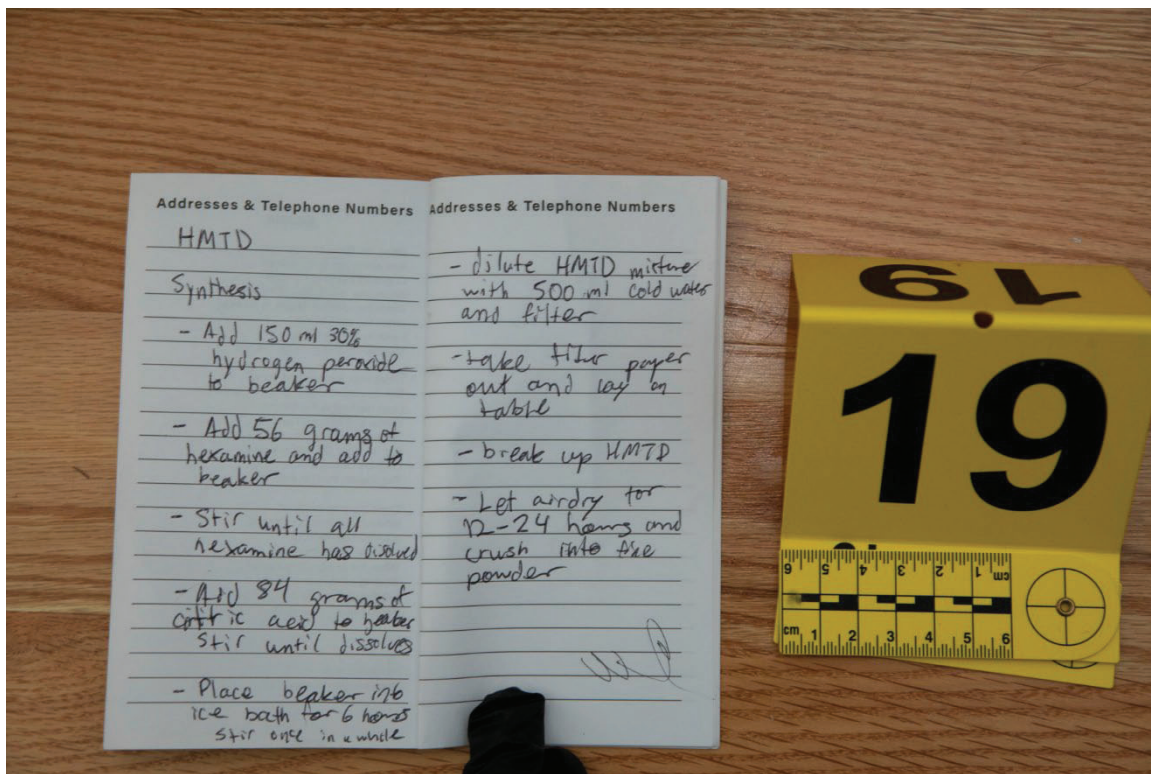
27. I know from my training and experience, and speaking with FBI bomb technicians that HMTD is a synthesized explosive made from three commercially available products: Hexamine (found in camping fuel stoves and elsewhere); Hydrogen Peroxide (found in pool supplies and elsewhere); and Citric Acid (found in over-the-counter supplements and elsewhere). (These are the same ingredients listed by BRUNSON in his training videos described above.) However, HMTD is extremely sensitive to heat, shock, and friction, and thus is generally too unstable to use in commercial, industrial, or military explosives. Instead, it is more typically known to be used in unlawful improvised explosive devices as the primary explosive. While HMTD has been found from time to time in illicit bomb-making locations, it is very unusual to

² These items were subsequently sent to an FBI laboratory for further testing. The FBI laboratory did not detect the presence of HMTD on either item. However, the FBI analysis equipment was set to measure substances in parts per million. The equipment used at Boston Logan International Airport tests for trace amounts of explosives which are present in parts per billion. Moreover, the swabbing technique used at the airport could have removed all traces of the HMTD prior to the items being sent to the FBI laboratory.

find it on a checked bag in the United States. I know from my discussions with the FBI bomb technicians and others, that neither the precursor chemicals used in HMTD, nor other commonly available substances would result in a positive test for HMTD on the equipment used by TSA at Boston Logan International Airport.

Search of Brunson's Newton Home Reveals Explosive Recipe

28. On August 23, 2023, law enforcement agents executed a search warrant on Brunson's family home in Newton, Massachusetts, to search for bomb-making materials and other related items. In Brunson's bedroom, officers found a notebook in which there were not only notes of the precursor chemicals making up HMTD, but also a detailed formula for making the explosive:



29. In addition, a State Police bomb dog was used to sweep the house. The bomb dog alerted on three locations in BRUNSON's bedroom but not in any other location in the house. The

bomb dog alerted on two canvas briefcases which were on the floor of BRUNSON's room, and a set of drawers in BRUNSON's closet.³

30. Upon his departure from the United States in August 2023, Brunson told CBP that he was going to Yerevan to attend the American University of Armenia. Information recently obtained indicates that he remains in Armenia. Efforts have been made recently to encourage Brunson to return to the United States to meet with agents regarding the conduct described herein. Through a representative, Brunson has declined to return.

CONCLUSION

31. Based on the foregoing, there is probable cause to believe that BRUNSON did: (1) beginning on or about January 2, 2023, and continuing through on or about August 20, 2023, knowingly and willfully falsify, conceal, and cover up by trick, scheme, and device one or more material facts in a matter within the jurisdiction of the executive branch of the Government of the United States, in that he, in response to questions by University of Chicago police, agents with the Federal Bureau of Investigation, and officers of the Department of Homeland Security Customs and Border Protection, knowingly and willfully concealed material facts related to his efforts to make explosive devices, in violation of 18 U.S.C. §1001(a)(1); and (2) on or about August 20, 2023, in response to questions by an officer of the Department of Homeland Security Customs and Border Protection, knowingly and willfully made a materially false, fictitious, and fraudulent statement in that he falsely denied ever being in a place where firearms or explosives were used or

³ These items were subsequently sent to the FBI laboratory and were tested for the presence of HMTD. Using a detection limit of parts per million, the FBI laboratory did not detect HMTD on the bags and drawers.

handled, and could not think of any reason why explosive residue was found on his belongings, in violation of 18 U.S.C. § 1001(a)(2).

Respectfully submitted,

Thomas M. Dalton /by Paul G. Levenson
Thomas Dalton
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed to me telephonically
This 27th day of August, 2024


Hon. Paul G. Levenson
United States Magistrate Judge

