

DMP:ANR
F. #2023R00497

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 2339B(a)(1))

SYED AMAN,

24-MJ-599

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MARISA ZAHN, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between June 2023 and November 5, 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SYED AMAN did knowingly attempt to provide material support and resources, as defined in 18 U.S.C. § 2339A(b)(1), including services, currency, monetary instruments, and personnel (including himself), 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, knowing that ISIS was a designated foreign terrorist organization and that ISIS had engaged in and was engaging in terrorist activity and terrorism.

(Title 18, United States Code, Section 2339B(a)(1))

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2020. I am currently assigned to the FBI's New York Joint Terrorism Task Force ("JTTF"). As a Special Agent, I have conducted numerous investigations of foreign terrorist organizations and their supporters, during the course of which I have conducted physical surveillance, interviewed witnesses, debriefed confidential human sources, executed court-authorized search warrants and used other investigative techniques to secure relevant information. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. The defendant SYED AMAN is a 28 year-old United States citizen, who currently resides in Franklin Square, New York.

A. ISIS

3. On or about October 15, 2004, the U.S. Secretary of State designated al Qaeda in Iraq ("AQI"), then known as Jam 'at al Tawhid wa' al -Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act (the "INA") and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 and as a Specially Designated Global Terrorist entity under

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Section 1(b) to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (abbreviated as ISIS, which is how the FTO is 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 FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

4. Based on my participation in this investigation and my review of open-source reporting, I am aware that ISIS routinely carried out killings and deliberate targeting of civilians; mass executions; persecution of individuals and communities on the basis of their religion, nationality, or ethnicity; kidnapping of civilians; forced displacement of Shia Muslim communities and minorities; killing and maiming of children; rape; and other forms of sexual violence. ISIS recruited thousands of foreign fighters—i.e., non-Syrians and non-Iraqis—from around the globe to assist with its efforts to expand its caliphate in Iraq and Syria. Tens of thousands of extremists have traveled to the Middle East to join ISIS.

5. I am also aware that, on or about September 21, 2014, ISIS spokesperson Abu Muhammad al-Adnani issued a recorded statement calling for attacks against citizens – civilian or military – of the countries participating in the United States-led coalition against ISIS. Since then, ISIS has claimed credit for numerous terrorist attacks against Americans and other Westerners around the world. ISIS supporters have also continued to publicly express their desire to continue to target and attack the United States and other Western nations.

6. To gain supporters, ISIS, like many other terrorist organizations, leverages technology, including the internet, email, social media, and encrypted communications platforms to spread its violent extremist ideology and for the purposes of inciting adherents to commit terrorist acts. Using these platforms, ISIS posts and circulates propaganda videos and messaging as well as depictions and glorifications of attacks in English, Arabic, and other languages, to draw support to its cause. ISIS has disseminated a wide variety of recruiting materials and propaganda through social media, which includes photographs and videos depicting ISIS activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS and members of other Islamic extremist organizations.

B. AMAN Expresses Support for ISIS

7. In repeated communications throughout 2023 and 2024, AMAN expressed his support for ISIS and sent money to a confidential human source (the “CHS”) with the stated purpose that said money was being donated by AMAN to financially support ISIS located in Syria. Since sending money to the CHS, AMAN began preparing to travel to Turkey with an ultimate destination of Syria to commit jihad, as further described below.

8. In or about June 2023, AMAN participated in an online ISIS group forum on a social media platform (“Social Media Platform 1”) which consisted of individuals sharing ISIS propaganda and discussing subjects such as how to make hijrah² and how to provide financial support to ISIS. The CHS was one of the participants in the group forum and represented himself or herself to be an ISIS supporter and operative in the Middle East.

² “Hijrah” is traditionally a religious pilgrimage. In the context of ISIS, “hijrah” is the act of moving to an ISIS territory to join the organization and fight on its behalf.

9. In the group forum, the CHS observed AMAN openly discuss hijrah, jihad, and AMAN's support for ISIS. After communicating in the group forum, AMAN first sent a direct message to the CHS on or about June 13, 2023 on the Social Media Platform 1. AMAN stated to the CHS that he wanted to travel to join ISIS in Iraq or north Baghdad. AMAN inquired with the CHS about how AMAN might locate the mujahideen³ and AMAN's desire to make hijrah.⁴

10. The CHS moved the conversation with AMAN to another social media platform ("Social Media Platform 2") on or about June 14, 2023. AMAN's initial message to the CHS on Social Media Platform 2 stated that he was the same individual who had previously contacted the CHS on Social Media Platform 1.

11. The next day, on or about June 15, 2023, AMAN again expressed to the CHS AMAN's desire to make hijrah. AMAN asked the CHS what the "ISIS Amirs"⁵ were calling for in terms of where to perform hijrah. Based on my training and experience, I assess that AMAN was requesting information from the CHS on any official guidance from ISIS leadership as to where to travel to perform hijrah. In response to AMAN, the CHS asked to which Middle Eastern country AMAN intended to travel. The CHS provided general guidance on travel and stated that there were options to avoid detection depending on what country AMAN selected.

³ "Mujahideen" means "religious warriors." In the context of ISIS, the term is used to describe ISIS fighters.

⁴ Unless otherwise indicated, communications between AMAN and the CHS are in Arabic. The translations included in this affidavit are from Arabic to English and are in draft form and subject to change.

⁵ An "Amir" (an alternative spelling of "emir") is a ruler or commander in Islamic countries. In the context of ISIS, the term refers to an ISIS leader.

12. On or about June 18, 2023, AMAN explained to the CHS that AMAN had previously planned to perform hijrah in Syria, but once he informed his mother of his plans, she took away his passport so he was no longer able to travel. AMAN described to the CHS the ways in which AMAN was preparing for hijrah, including reading a book on jihad. The CHS stated that Syria was dangerous and difficult to travel to and then asked what experience AMAN had to perform jihad.

13. On or about June 20, 2023, AMAN shared his professional background with the CHS, including that AMAN had been a programming engineer for six years. AMAN described that he authored two manuals for ISIS, one manual on cyber and personal security precautions for supporters of ISIS (the “Cyber Manual), as well as another manual aimed to “motivate brothers for Jihad”⁶ (the “Realities of this World Manual”). AMAN explained to the CHS that he quit his job to prepare for hijrah and that he hoped that he was not a “problem for mujahideen but a source of strength” for them. On the same day, AMAN sent these English-language manuals to the CHS.

14. Based on my review of the manuals that AMAN provided to the CHS, the Cyber Manual is a 34-page manual that details security precautions for the “soldiers of the Khalifah.”⁷ In the Cyber Manual, AMAN stated, “[a]s some of the senior passed leaders have said, do you[r] jihad intelligently, don’t post yourself publically of your intention for hijrah jihad.” AMAN explained, “[b]rother, if you don’t take the traditional security

⁶ In the context of ISIS, “brothers” typically refers to other ISIS members or supporters.

⁷ “Khalifah” is Arabic for caliphate, used to refer to the whole of ISIS’s territory. ISIS declared the establishment of an Islamic caliphate in June 2014 and the term is used to refer to the ISIS goal of establishing a physical religious state for the Islamic community.

precautions, the digital security precautions can only reduce your sentence.” AMAN pointed to a June 2023 newspaper article about an individual who was arrested in London for plotting a terrorist attack inspired by ISIS on British police or soldiers. The article described that the individual was caught because he was tipped off to law enforcement by people who knew him.

15. In the Cyber Manual, AMAN detailed steps for hijrah and jihad, including learning rifle marksmanship, doing physical training, learning field medic training, and reading the Quran. In this section of the Cyber Manual, AMAN stated: “[b]rothers, we do not have an excuse to abandon jihad. Rather, Allah warns us of severe punishment if we do not go forth in jihad.” An additional section of the Cyber Manual titled “Security Precautions for Hijrah” advised readers to find wilayaats⁸ that are “easier to enter.” AMAN stated that “the following are relatively easy to enter in comparison to Syria and Iraq,” and listed West Africa, Sahel, Mozambique, and Khorasan provinces, which are all associated with ISIS territories. AMAN also suggested that individuals “take a steel pen with you” to the airport in case there are “security forces waiting for you at the airport and try to arrest you, since other weapons are difficult to bring to the airport.”

16. The Realities of this World Manual is a motivational 18-page manual which includes topics such as exposing the “evil” of America, justifying the 9/11 attacks on the United States, inspiring others to fight for ISIS, and refuting popular arguments against supporting ISIS. The Realities of this World Manual also praised the Islamic State as being

⁸ “Wilayat” refers to the territories under the governance of ISIS that are divided by geographical boundaries, often translated into English as “province.”

“on the right path” and that “killing kuffar⁹ and aiders of Crusaders is not sinful, rather is rewarded.”

17. On or about June 22, 2023, the CHS commented that there are few brothers who have AMAN’s experience in programming and that such experience was “special.” The CHS also complimented AMAN’s Arabic. In response, AMAN shared additional information about his professional background with the CHS, including that AMAN worked as a computer engineer since 2017 and then in 2022, worked for one of the largest companies in the world. AMAN sent a screenshot of some of his computer code to the CHS. Law enforcement queried open-source databases which located an identical match of the code sent by AMAN to the CHS in a software developer platform (the “Software Developer Platform”) repository. The Software Developer Platform records indicated that the code was associated with AMAN’s email address syednashikaman@gmail.com and his LinkedIn account. AMAN’s LinkedIn account indicated he resided in the New York metro area, attended a leading university in New York, and was then employed as a Senior Engineer at a leading management consulting company, which was consistent with the information that AMAN provided to the CHS. Records obtained from Software Developer Platform, LinkedIn, and Google all confirmed AMAN to be the owner of the above listed online accounts.

18. On or about June 28, 2023, AMAN sent messages to the CHS in which AMAN continued to praise ISIS. Specifically, AMAN referenced that an ISIS Amir was killed and stated “may Allah bless him with Jannah.”¹⁰ AMAN then expressed to the CHS

⁹ “Kuffar” is the plural of “kafir,” which means a non-believer of Islam. In the context of ISIS, a kafir refers to non-Muslims and/or Westerners.

¹⁰ “Jannah” in Islam means paradise or heaven, and is considered the final destination for

that the “death of our brothers will not make us weak but will make us much more angry.” In response, the CHS asked Allah to keep him and AMAN strong in their beliefs, and told AMAN “anything you need I am here.”

19. On or about July 5, 2023, AMAN moved his conversation with the CHS to another social media platform (“Social Media Platform 3”).¹¹ AMAN told the CHS that Social Media Platform 3 was more secure. The CHS agreed to message with AMAN on Social Media Platform 3.

C. AMAN Sends Cryptocurrency to the CHS for ISIS

20. On or about July 12, 2023, AMAN asked the CHS on Social Media Platform 3 if the “brothers” have an “XMR¹² wallet” to receive cryptocurrency, like Bitcoin. The CHS responded and said he would “ask some brothers” about receiving cryptocurrency. In this same conversation, AMAN asked the CHS if he had permission from the Diwan¹³ to publish the cybersecurity manual that he had authored. The CHS responded and stated that he would talk to the brothers in Diwan regarding AMAN’s request to send cryptocurrency to them.

21. On or about July 13, 2023, AMAN asked the CHS if he (AMAN) could “encourage other brothers” to send money to support ISIS. AMAN explained that he would use Monero to send money to the CHS because he believed it would not be traceable.

Muslims who live “good” lives. ISIS has implied that its supporters will secure their place in Jannah, or paradise, if they fight on behalf of ISIS.

¹¹ Social Media Platform 3 is a cross-platform end-to-end encrypted instant messaging application.

¹² “XMR” is the currency symbol for Monero, a privacy-focused, open-source cryptocurrency. Monero’s blockchain uses privacy-enhancing technologies to make transactions anonymous and virtually untraceable.

¹³ “Diwan” refers to various governing and administrative bodies of ISIS.

Additionally, AMAN asked the CHS if AMAN had permission to encourage other brothers to join Social Media Platform 3 to “recruit them” because he believed the platform was more secure.

22. On or about July 14, 2023, the CHS confirmed that ISIS was using cryptocurrency and asked AMAN to which wilayat AMAN wanted to send money so that the CHS could “talk to the brother in charge.” AMAN replied that he wanted to send money to wilayat “Al-Sham.”¹⁴ AMAN stated that he needed to take security precautions to send the money to the CHS because “it is dangerous here in the U.S.” The CHS responded that “taking precautions is important especially for the brothers [that] live in kuffar countries.”

23. On or about July 15, 2023, the CHS told AMAN that the brother in the wilayat Al-Sham provided him the cryptocurrency wallet address, which the CHS then sent to AMAN.

24. On or about July 16, 2023, AMAN asked the CHS “do you want me to do any type of training and other things [in] preparation for Jihad?” The CHS asked AMAN if AMAN had any weapons experience and when AMAN intended to perform hijrah so the CHS could work with the brothers on finding him a safe path to travel. Later in the same conversation, AMAN stated that he would find his passport soon, so he could travel for jihad. AMAN explained that once he obtained his passport, he would ask the CHS for permission to leave the United States to commit jihad abroad for ISIS.

¹⁴ “Al-Sham” in Arabic means the greater Syria region, encompassing parts of Syria, Lebanon, Israel, Palestine, Jordan, Cyprus, and Turkey. “Wilayat Al-Sham” refers to the ISIS territory in this region.

25. Over the next several weeks, AMAN continued to communicate with the CHS and repeatedly expressed his desire to commit jihad for ISIS. In response to AMAN's messages, the CHS affirmed his mutual support for jihad.

26. On or about July 27, 2023, the CHS sent a message to AMAN which stated that "[t]he brother from Al-Sham contacted" the CHS and said he had not received any cryptocurrency yet from AMAN.

27. On or about August 1, 2023, AMAN responded that he was in the process of obtaining Bitcoin so that he could then purchase Monero to send to the CHS. AMAN also praised the new ISIS leader, Abu Hafs, and stated "may Allah protect him."

28. On or about August 2, 2023, AMAN stated that he purchased Bitcoin and that he now needed to purchase "Monero safely." The CHS asked that AMAN tell him when he sent the Monero to the cryptocurrency wallet so that the CHS could inform the brothers. AMAN told the CHS that it takes time to buy Bitcoin with cash and that Bitcoin cannot be transferred for a few days after purchase.

29. Records from a U.S.-based cryptocurrency exchange (the "Cryptocurrency Exchange") show that, on or about August 3, 2023, AMAN deposited approximately \$160 on the Cryptocurrency Exchange and then the same day purchased that amount in Bitcoin.

30. From in or about August 2023 until January 2024, AMAN did not contact the CHS, nor did the CHS contact AMAN.

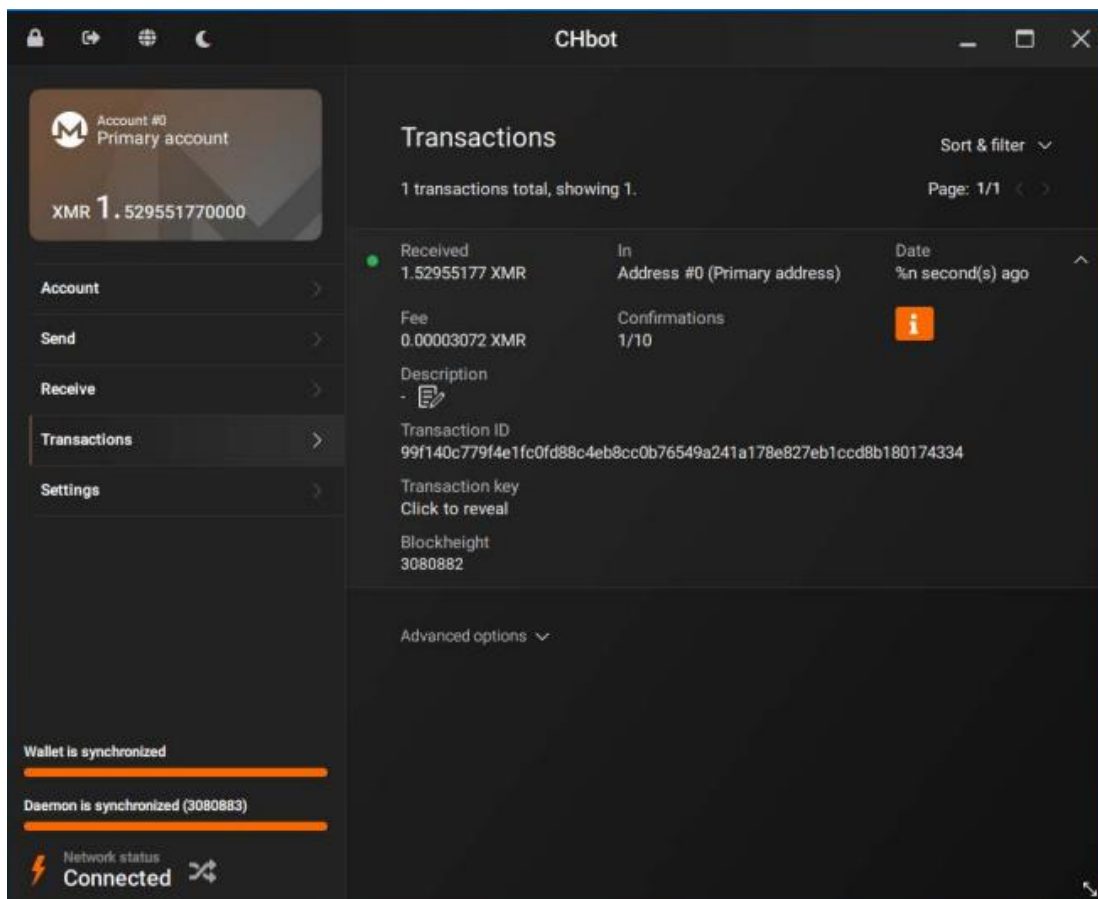
31. On or about January 31, 2024, AMAN messaged the CHS and apologized that he had not been in contact. AMAN said in English that he was "[t]o cautious" and "it prevented [him] from sending" money to the CHS. The CHS responded that the CHS could ask the brothers for the cryptocurrency wallet address again. AMAN responded in English

“[y]es brother give me the address. This is for jihad only.” The CHS re-sent AMAN the cryptocurrency wallet address. AMAN stated in English that he first had to sell his Bitcoin for Monero, but that once he did he would “send it to the address of the brother.” The CHS responded “[g]o ahead dear brother May Allah reward you dear brother.”

32. On or about January 31, 2024, AMAN stated to the CHS in English that “[t]he \$150 [AMAN] bought is now \$230.” According to records from the Cryptocurrency Exchange, on or about February 2, 2024, the Bitcoin in AMAN’s account was valued at approximately \$230. On February 2, 2024, AMAN withdrew that amount of Bitcoin and transferred it to an unknown cryptocurrency platform.

33. On or about February 9, 2024, AMAN messaged the CHS in English that AMAN sent the money and included the amount he sent in Monero, which was approximately \$186.64. AMAN requested in English that the “brother [] confirm receipt of the amount” to the cryptocurrency wallet address the CHS had sent him. The CHS confirmed to AMAN that the brothers received the Monero in the cryptocurrency wallet.

34. The cryptocurrency wallet provided by the CHS received the exact amount of Monero that AMAN indicated in his message that he had sent to the CHS. A screenshot taken by the CHS of the cryptocurrency wallet reflecting AMAN’s contribution is depicted below:



The CHS did not provide that cryptocurrency wallet address to any individual other than AMAN. Therefore, I assess that AMAN was the sender of that money. After sending the Monero to the CHS, AMAN stated in English, “my brother make dua¹⁵ that Allah makes a way for me to jihaad with the mujahideen in syria.”

35. On or about February 12, 2024, AMAN stated that the money was “for mujahideen, to prepare them and supplies.” The CHS thanked AMAN for the contribution.

36. On or about March 10, 2024, the CHS informed AMAN that AMAN’s money was “used to buy weapons and bullets” and said “they still need more money may Allah

¹⁵ “Make dua” in Islam means to make a request or prayer to God.

help.” AMAN responded to the CHS and said “I will send more” to the same cryptocurrency wallet address as before.

D. AMAN Praises an ISIS Attack in Russia

37. On or about March 23, 2024, AMAN sent a message to the CHS praising an ISIS attack in Russia. ISIS-Khorasan took responsibility for a terrorist attack at the Crocus City Hall concert venue in Moscow, Russia, which resulted in the death of 130 people and injured hundreds more. AMAN stated in English that “[he] wished some day [he] can fight them too just as [his] brothers did.”

38. From about the end of March 2024 until the beginning of July 2024, AMAN did not contact the CHS, nor did the CHS contact AMAN.

E. AMAN Prepares to Travel to the Middle East to Fight for ISIS

39. On or about July 5, 2024, AMAN contacted the CHS to inform the CHS that AMAN had returned from a trip for Hajj¹⁶ in Saudi Arabia, and was again in possession of his passport but needed money to travel. In English, AMAN claimed that the “FBI and their intelligence” was “tracking” him.

40. On or about August 1, 2024, AMAN informed the CHS in English that AMAN needed to delete Social Media Platform 3 “until it is safe as they are known to seize phones.” I assess that AMAN’s reference to “they” referred to law enforcement. AMAN told the CHS he would save the CHS’s username so that he could contact him in the future. AMAN stated “I will definitely message you in the future. You are beloved to me. I don’t know how long it will take before I get some safety. Maybe more than a year.” The CHS

¹⁶ “Hajj” is a religious pilgrimage.

told AMAN to contact him in the future when AMAN had time, and asked that Allah grant AMAN patience and steadiness in his efforts.

41. From about the beginning of August 2024 until the end of September 2024, AMAN did not contact the CHS, nor did the CHS contact AMAN.

42. On or about October 1, 2024, AMAN reached out to the CHS. AMAN stated in English that AMAN wanted to “discuss a plan.” Specifically, AMAN stated that he was “ready to hijrah and join the jihad” and sought advice from the CHS about whether his plan was “good or not.” AMAN described his plan as follows: First, AMAN stated that he wanted to get laser eye surgery in the United States because it would be difficult if he lost his glasses abroad since he would not be able to see anything. AMAN stated that he “read that soldiers get eye surgery.” Second, AMAN stated that he “need[ed] to leave the country immediately” and discussed his awareness of a “no-fly list.” Third, AMAN stated that he had no money, but had a credit card with an \$11,000 credit limit so he could “purchase [his] flight and anything else necessary” for his travel to commit jihad. Fourth, AMAN stated that he had his passport again but that a direct flight to Turkey “will look suspicious.” AMAN stated that he had two options: to fly directly to Turkey or to fly to his parents’ home country of Bangladesh with a layover in Turkey where he could then “prepare [himself] for smuggling.” Alternatively, AMAN said, he could go to Bangladesh and then wait a few weeks and then take a direct flight to Turkey. AMAN stated that his wife was in Bangladesh, he had not seen her in a long time, and “if [he] [did] jihad [he] will not be able to see her anymore.” AMAN asked the CHS what he should do. AMAN asked the CHS to “prepare [AMAN] for what [AMAN] should do when [he] arrive[d] in Turkey? What should [he] bring. Should [he] shave [his] beard? Should [he] send [the CHS] a picture of

[AMAN's] face so [the CHS] [could] identify [him]? Where should [AMAN] go?" The CHS responded that the CHS would speak to the brothers and ask which time and place was suitable for AMAN to travel. AMAN said he wanted to travel "safely and hastily." Specifically, AMAN indicated that he wanted to travel "immediately a few days after [his] laser eye surgery."

43. On or about October 7, 2024, AMAN informed the CHS in English that his appointment to discuss eye surgery was Wednesday, October 9, 2024. AMAN expressed to the CHS "a good date to arrive in Turkey would be helpful for me." The CHS asked AMAN if AMAN meant to travel to Turkey directly. AMAN stated in English that he might have to go to a different country first, otherwise he might be stopped from taking the flight. I assess, based on the conversation, that AMAN meant that he would be stopped by law enforcement from taking the flight. In English, AMAN stated that once he got his eye surgery, he would purchase his ticket to Bangladesh. AMAN stated that once he arrived in Bangladesh, he would purchase a one-way ticket to Turkey with cash.

44. AMAN later followed up in English that his eye surgery was scheduled for October 25, 2024, and that once he received the surgery, he would purchase his ticket to Bangladesh. AMAN again raised with the CHS that he did not know if law enforcement would "stop [him] at the airport and prevent [him] from leaving America."

45. Later that night, AMAN sent another message in English to the CHS that he would take a flight to Istanbul, Turkey from Bangladesh and asked the CHS where he could meet a smuggler or whether he should take a bus to Gaziantep, which I know is located at the border of Turkey and Syria. AMAN asked the CHS what AMAN's destination would be in Syria and whether AMAN would be in a city or desert which would determine the items that

AMAN would pack for his trip. The CHS asked if AMAN had a laptop and stated, if it was not heavy, AMAN could bring it in his bag. AMAN sent the CHS a picture of his desktop computer and stated that perhaps a laptop would be easier to carry with him. The CHS said he would ask the brothers but thought that the computer was likely too big and heavy and might raise suspicion at the airport. The CHS told AMAN that the travel for hijrah is often difficult and asked if AMAN was prepared and ready.

46. On or about October 11, 2024, AMAN responded to the CHS in English that he understood and that he was ready. AMAN also agreed that traveling with a laptop was better.

47. On or about October 12, 2024, AMAN stated to the CHS in English that AMAN should perhaps buy a ticket directly to Turkey and continued to solicit advice on his travel plans. AMAN also discussed visiting his wife and giving her a couple years' worth of money before he left Bangladesh for Turkey.

48. On or about October 13, 2024, the CHS said the brothers asked if AMAN was serious this time about hijrah and said that the CHS "honestly [] didn't know what to answer them?" AMAN responded "[y]es I am serious. I am sorry last time I did not follow through Because of the uncertainty at the airport." AMAN stated that "jihad and hijrah" are "the most important thing, more than anything else at the moment." The CHS said he would let the brothers know that AMAN was serious so that they would prioritize preparing for his arrival. The CHS asked that AMAN keep him apprised of his travel plans.

49. On or about October 14, 2024, AMAN told the CHS that AMAN had another friend who wished to send money for jihad.

50. On or about October 18, 2024, AMAN asked the CHS in English whether AMAN should bring his “Sahih Bukhari”¹⁷ with him. AMAN inquired if bringing the book would raise suspicion and then on his own decided to not bring it with him. The CHS said AMAN could download the book as a PDF on his device to refer to it if he needed.

51. On or about October 19, 2024, AMAN expressed regret to the CHS that he did not fight on behalf of ISIS in Syria or Iraq in 2013¹⁸ and lamented that he was not able to get those years back. The CHS told AMAN to be patient and that Allah would guide him.

52. On or about October 20, 2024, AMAN told the CHS in English that AMAN purchased a second phone in case he needed it and asked for advice on how AMAN should communicate with the CHS when AMAN arrived in Turkey. AMAN pointed out to the CHS that it was “6 more days,” which I assess to mean that AMAN was counting down the days to his eye surgery in preparation for his departure. AMAN continued to discuss various travel logistics with the CHS and how he would keep in touch with the CHS abroad. The CHS stated that he would provide information of the brother who would pick up AMAN from the airport and that AMAN could keep the CHS’s contact information if AMAN needed to contact the CHS.

53. On or about October 24, 2024, AMAN messaged the CHS in English and Arabic. AMAN stated, “I hate the kuffar who deny the path of Allah. They persecute the Muslims, they persecute me, and they are very arrogant. May Allah bless us with victory

¹⁷ “Sahih Bukhari” is an Islamic religious text and has been relied upon as a justification for committing jihad.

¹⁸ Based on my training and experience, I understand that ISIS acquired territory in Syria and Iraq in 2013 and continued to do so when it established a Caliphate in 2014.

and mujadeen.” AMAN continued, “[i]f you don’t kill them they will kill us and ruin the earth with decay.”

54. In the same conversation, AMAN discussed his travel logistics with the CHS. AMAN asked the CHS if he should shave his beard to avoid suspicion and the CHS responded that he should. AMAN indicated that if he were seized at the airport by law enforcement he would “attack them and kill them and be killed. This is important for me, that Allah gives me bravery and steadfastness.” AMAN also stated that he asked “Allah for success and to join with the mujahideen in Syria.” AMAN said that he was finishing his preparation to travel and shared potential flight options with the CHS. As part of his discussion regarding flight options, AMAN stated that he would “buy fake round trip” tickets to Kuwait so that law enforcement was “not suspicious.” AMAN stated that once he was in Kuwait he would then buy a ticket to Turkey. Based on AMAN’s previous comments to the CHS, I assess that AMAN’s purpose in purchasing a “fake ticket” to Kuwait was to obfuscate his true destination, which was to travel to Syria by way of Turkey to join ISIS. The CHS said he would be in Sakarya, Turkey on November 1 and that he would be there to see AMAN and greet him.

55. On or about October 25, 2024, AMAN stated in English that he completed his eye surgery and sent a photograph of himself to the CHS with protective disposable glasses. AMAN informed the CHS that he attempted to purchase his plane ticket but that “they are rejecting it brother.” AMAN shared that he called his credit card company and said his airline ticket purchase was stopped due to fraud protection. The CHS responded and said that he prayed for AMAN to have a successful surgery and told him to be patient.

56. Pen register and trap and trace records indicate that AMAN called his credit card company's customer service on or about October 25, 2024 after attempting to purchase his airline ticket. Additionally, the FBI received a notification from the Department of Homeland Security that AMAN attempted to purchase an airline ticket to Kuwait. AMAN was unable to do so.

57. On or about October 26, 2024, AMAN discussed in English his previous attempt to perform hijrah two years ago and said it was unsuccessful because he had no contacts and his parents had taken his passport. AMAN expressed gratitude that he had met the CHS because it meant that AMAN had "a brother and contact as a guide." AMAN stated, "Now a third time my brother is there for me and I am almost there. I have everything, all I need is to purchase two tickets." AMAN also expressed frustrations with AMAN's mosque, and stated that "[j]ihad is the only way to stop this. They don't listen or obey anything only under swords."

58. On or about October 27, 2024, AMAN stated in English that his credit card company unlocked his card but that he did not know if this solved this issue of him being able to book his travel. AMAN said he would attempt to purchase the airline ticket again. AMAN later told the CHS that AMAN tried to purchase the ticket again but was unable to do so. The CHS asked AMAN to update him and said that the brothers could wait for him if there was a delay in his travel.

59. On or about October 29, 2024, AMAN advised the CHS in English that he again attempted to purchase a plane ticket to Kuwait from a different website. AMAN advised that he would "figure out more tomorrow." AMAN added that he felt "trapped here in this country." The CHS replied and asked AMAN how he was able to book his ticket

when he travelled for Hajj earlier in the year. Based on my review of travel records, I am aware that AMAN attempted to book a flight from John F. Kennedy International (“JFK”) Airport to Kuwait on or about October 29, 2024.

60. On or about October 30, 2024, AMAN advised the CHS in English that AMAN was able to travel to Saudi Arabia on Hajj because a relative paid a Saudi Hajj website and the “Saudis” gave them their plane tickets. AMAN indicated that he had never heard of a credit card company declining purchases of airline tickets. He said that “they stop you at the airport, not during purchase.” I assess that AMAN is referring to law enforcement.

61. In the same conversation, regarding his experience on Hajj, AMAN stated that the “infidels bothered” him while he was traveling. He claimed “they” looked through his email while he was on Hajj probably out of suspicion that he was doing some “‘terrorist’ activity.” AMAN said “they” used this as an excuse to ask him several questions before he boarded his flight. He believed that “they” must have seen emails in his account indicating he sent cryptocurrency to an unknown receiver. AMAN believed that detection of these emails was probably the reason his bank and cryptocurrency accounts were closed. AMAN speculated that if “they” had read all his emails they would have seen the purchase he made two years ago for a plane ticket to Turkey. AMAN said that even if evidence of that purchase were discovered, it did not “mean anything” because AMAN ultimately cancelled the flight. AMAN stated that he did not know what “they” were thinking or why his credit cards were getting declined. As an alternative, AMAN suggested that he was going to attempt to purchase a plane ticket through a different website using PayPal. I believe that AMAN’s references to “they” refer to law enforcement.

62. On or about October 30, 2024, AMAN sent screenshots of a booking confirmation and flight details to the CHS for travel from JFK Airport to Doha, Qatar on November 5, 2024 at 9:30 pm EST. Although the flight confirmation indicated that AMAN had a layover in Doha and would continue traveling to Dhaka, Bangladesh, AMAN advised the CHS in English that he would purchase a ticket to Turkey after arriving in Doha. AMAN informed the CHS that “they” would likely interrogate him at the airport and ask why he was traveling. AMAN asked the CHS, “What should I say? To visit my wife because of her visa interview? I will be back in two week[s].” I assess that when AMAN referred to “they” interrogating him, he was referring to law enforcement. I further assess that AMAN’s statements about what he should say to law enforcement constituted an effort to fabricate a story about why he was traveling and to obfuscate his attempt to travel to Syria via Turkey to join ISIS.

63. AMAN further stated, “Then when I reach Qatar I must purchase a ticket to Turkey locally.” AMAN stated he would buy something from a store in Doha to confirm his credit card worked prior to booking a ticket to Turkey. AMAN advised further, “When I reach Istanbul airport, I must hurry and leave the airport quickly and disappear before someone follows me.” AMAN confirmed to the CHS after sending his flight confirmation that he had “successfully purchased the airline ticket from USA to Qatar as Kuwait did not work.” AMAN speculated that perhaps security was different for the two countries.

64. AMAN stated that his journey had “only begun,” and that the day of his flight would be the “second challenge.” AMAN stated, “All I have to defend myself is a steel pen in case things go wrong and I am arrested, but I do not think they will try to do this As they do not have any proof of my intentions I think. It is only if they discover this chat in

Session, which I will have to delete.” As noted above in paragraph 15, AMAN’s security manual advised people who wanted to make hijrah to carry a “steel pen” to the airport in case law enforcement were present because other weapons were difficult to bring to the airport.

65. AMAN reiterated that if he were questioned at the airport he would tell “them” he was traveling to visit his wife for an immigration interview and would “be polite to them so they do not become suspicious.” AMAN stated that his “third challenge” would be at Qatar airport to book a flight to Turkey; the “fourth challenge” would be “getting passed customs and boarder guard at the airport for ‘tourism’”; and the fifth challenge would be getting to the CHS in Turkey.

66. On or about October 31, 2024, AMAN sent the CHS a picture of his New York driver’s license as well as his United States passport. AMAN again asked the CHS about his beard length. The CHS suggested that he cut his beard slightly.

67. On or about November 1, 2024, AMAN told the CHS “this week is the last week for me.” I assess that AMAN means that this is the last week for him in the United States before he travels with the intention of joining ISIS. On or about November 2, 2024, the CHS inquired about AMAN’s travel preparations. On or about November 3, 2024, AMAN responded that he would get his hair and beard cut, as well as reset his phones and computer. AMAN also indicated that he would bring “protective sunglasses that American soldiers wear to protect the eye[s] during shooting.”

68. On or about November 5, 2024, law enforcement conducted physical surveillance of AMAN and observed him travel to a barbershop in Franklin Square, New York. When AMAN exited the barbershop, it appeared that he got a haircut and beard trim as he informed the CHS he would do.

69. The CHS observed that, in late October 2024, AMAN stated online that he wanted “to kill Americans.”

F. AMAN Travels to JFK Airport

70. On or about November 5, 2024, AMAN departed his residence to JFK Airport. The FBI conducted physical surveillance of AMAN from his residence to JFK Airport. At JFK Airport, AMAN checked into his flight to Doha, Qatar and checked a bag at approximately 5:30 pm EST. AMAN proceeded through security to his departure gate. At approximately 9:15 pm EST, AMAN attempted to board his flight, but the FBI arrested AMAN before he was able to do so. A silver metal pen was found in AMAN’s crossbody bag.

71. Upon AMAN’s arrest, the FBI executed a judicially authorized search warrant on AMAN’s residence. The FBI uncovered a notebook of AMAN’s in his bedroom. Based on my review of this notebook, AMAN had a list of items to prepare for hijrah, which included to carry cash or gold and phones, charger, and wallet and noted to “stay silent.” AMAN’s notebook included a hand drawn map of what appears to be Iraq and Syria with a star in Syria. AMAN’s notebook also included a list of subjects to study, such as to become mujahideen and a shaheed. A shaheed is a Muslim that carries out a religious commandment by dying on behalf of Islam.

WHEREFORE, your deponent respectfully requests that the defendant SYED AMAN be dealt with according to law.

MARISA ZAHN
Special Agent, Federal Bureau of Investigation

Sworn to before me this
__ day of November, 2024

THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK