

AFFIDAVIT OF SPECIAL AGENT GARY S. CACACE

I, Gary S. Cacace, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed for approximately twenty years. Since January 2007, I have been assigned as the Supervisory Special Agent in charge of the Worcester Resident Agency, which is responsible for investigating multiple violations of federal law under the FBI's jurisdiction. This includes the investigation of Counter Terrorism matters in Central, Massachusetts. During my employment at the FBI, I have investigated federal criminal violations related to international and domestic terrorism as well as drug offenses and economic crimes. In my capacity as a special agent, I have received training and gained experience in search and seizure, the use of confidential human sources, electronic and video surveillance, international and domestic terrorism, drug offenses, violent crimes, computer crimes, money laundering, fraud and various other crimes. I have executed numerous affidavits in support of federal search warrants and criminal complaints and have participated in the execution of more than one hundred search warrants.

2. Along with other agents whom I supervise, I am

currently investigating Rezwan Ferdaus ("FERDAUS"), a United States citizen, residing at 22 Coburn Drive, Ashland, Massachusetts for several federal criminal offenses. I have personally participated in this investigation and have been involved in all aspects of the investigation from its inception. The information in this affidavit is based upon my training and experience, my personal knowledge of this investigation, and information provided to me by other agents and law enforcement officials who have assisted in this investigation and have experience investigating international terrorism matters. This affidavit is submitted for the limited purpose of establishing probable cause in support of the issuance of a criminal complaint and arrest warrant. Therefore, it does not set forth each and every fact that I have learned during the course of this investigation. All conversations and statements described in this affidavit are related in substance and in part only unless otherwise indicated.

3. I am submitting this affidavit in support of a criminal complaint charging FERDAUS with (1) attempting to damage and destroy federal governmental buildings using an explosive in violation of 18 U.S.C. §844(f)(1); (2) attempting to injure and destroy national defense premises in violation of 18 U.S.C. §2155; and (3) attempting to provide material support and resources to a foreign terrorist organization in violation of 18

U.S.C. §2339B.

4. As described in detail below, I have probable cause to believe, and do in fact believe, that from no later than in or about March 2011 and continuing until in or about September 2011, FERDAUS did maliciously attempt to damage and destroy buildings, to wit, the Pentagon and U.S. Capitol Building, which are owned and possessed, in whole or in part, by the United States, using an explosive in violation of 18 U.S.C. §844(f)(1). In addition, I have probable cause to believe, and do in fact believe, that from no later than in or about March 2011 and continuing until in or about September 2011, FERDAUS did, with the intent to injure, interfere with, and obstruct the national defense of the United States, willfully attempt to injure and destroy national defense premises, to wit, the Pentagon, in violation of 18 U.S.C. §2155. Lastly, I have probable cause to believe, and do in fact believe, that, beginning in or about June 2011 and continuing through in or about September 2011, FERDAUS did knowingly and unlawfully attempt to provide material support and resources (as that term is defined in 18 U.S.C. §2339A(b)(1)), to wit, detonation devices, communications equipment, weapons, training, and expert assistance and advice to a foreign terrorist organization, namely al Qaeda. FERDAUS gave these items to undercover employees of the FBI ("UCE1," "UCE2," and collectively "UCes"), who he believed were members of al Qaeda, and did so intending that they

would use the devices against U.S. service members serving overseas. Further, when FERDAUS provided said detonation devices and training video, he knew that al Qaeda was a designated terrorist organization, that al Qaeda had engaged and was engaging in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that al Qaeda had engaged and was engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

RELEVANT LEGAL AUTHORITY

5. Title 18, United States Code, Section 844(f)(1) prohibits anyone from maliciously damaging or destroying, or attempting "to damage or destroy, by means of fire or an explosive, any building ... or real property owned or possessed by, or leased to, the United States, or any department or agency thereof ..." In addition, it is unlawful under Title 18, United States Code, Section 2155 to willfully injure, destroy, or attempt to injure or destroy, any national defense premises, "with the intent to injure, interfere with, or obstruct the national defense of the United States."

6. Title 18, United States Code, Section 2339B makes it illegal for anyone to attempt to provide material support or resources to a designated terrorist organization. The United States Secretary of State designated al Qaeda as a foreign

terrorist organization on October 8, 1999 and it remains so designated to this day.

7. For purposes of Sections 2339B, "material support or resources" is defined as:

any property, tangible or intangible, or service, including ... training, expert advice or assistance, ... communications equipment, ... weapons, ... explosives, personnel (1 or more individuals who may be or include oneself) ...

18 U.S.C. §2339A(b) (1) (omitting non-pertinent provisions). For purposes of Sections 2339A and 2339B "training" constitutes "instruction or teaching designed to impart a specific skill, as opposed to general knowledge." 18 U.S.C. §2339A(b) (2). "Expert assistance and training" means "advice or assistance derived from scientific, technical, or other specialized knowledge." 18 U.S.C. §2339A(b) (3).

SUMMARY OF INVESTIGATION

8. This investigation has revealed that beginning in or about 2010, FERDAUS, a 26 year-old Northeastern University graduate with a Bachelor's Degree in physics, began planning to commit violent "jihad"¹ against the United States, which he considers an enemy of Allah. With the goal of terrorizing the United States, decapitating its "military center," and killing as

¹While "jihad" is an Arabic term that refers to both "an internal struggle" as well as a military struggle on behalf of Islam, based upon my experience and training, I believe in this context FERDAUS is using this term to refer to his proposed violent acts against the United States.

many "kafirs," i.e., an Arabic term meaning non-believers, as possible, FERDAUS extensively planned and attempted to attack the Pentagon and U.S. Capitol Building using large remote controlled aircraft² filled with C-4 plastic explosives. Remote controlled aircraft are capable of carrying a variety of payloads (including a lethal payload of explosives), can use a wide range of take-off and landing environments, and fly different flight patterns than commercial airlines, thus reducing detection.

9. In addition, the investigation has revealed that FERDAUS has designed, built, and supplied more than 7 mobile phones, each of which FERDAUS had modified to act as an electrical switch for an improvised explosive device ("IED"),³ to

²As described in detail below, FERDAUS selected two models for his attack plans, the F-4 Phantom and F-86 Sabre. These remote controlled airplanes are a smaller scale version of U.S. military fighter jets, ranging from 60 to 80 inches in length and having a wingspan range of 44 inches to 63 inches. For instance, the F-4 Phantom FERDAUS chose to use in his attack on the Capitol Building was 1/10th the size of the actual F-4 Phantom II U.S. fighter jet. A photograph of such a remote controlled aircraft is attached as Exhibit 1. A photograph of a F-86 Sabre remote controlled aircraft is attached as Exhibit 2.

³During meetings with the FBI UCEs, FERDAUS referred to these devices as "detonators," "detonation devices," and "phones." To build these devices, FERDAUS purchased mobile phones, unscrewed the back cover of each phone, and then soldered wires to the phone. On several occasions, FERDAUS explained to the UCEs how these devices worked: when the mobile phone's number is dialed, the phone sends an electrical current through these wires, which would act as the "electrical switch" for the detonation device. Based upon my discussions with members of the FBI Explosives Unit, IEDs commonly consist of (a) a switch/trigger; (b) an initiator; (c) a power source; and (d) explosives. The FBI Explosives Unit has evaluated the mobile

FBI undercover employees, who FERDAUS believed were members of, and recruiters for, al Qaeda, to purportedly be used to kill American soldiers stationed overseas. As described below, during a meeting with two FBI UCEs on June 27, 2011, FERDAUS appeared gratified when the UCEs told him (falsely) that his first phone detonation device had succeeded in killing three U.S. soldiers and injuring four or five others in Iraq and responded, "That was exactly what I wanted." After each subsequent delivery, FERDAUS was anxious to know how well each of his detonation devices had worked and how many Americans they had killed. When asked why he wanted to build these detonation devices, FERDAUS explained that he "want[ed] to hit the kafir [non-believer] armies and [kill] as many people as possible."

10. During the course of the investigation, FBI agents utilized, among other things, a cooperating witness ("CW") who met with and engaged in consensually recorded conversations with FERDAUS beginning in January 2011, and two FBI UCEs who met with and engaged in consensually recorded conversations with FERDAUS beginning in March 2011. The FBI also conducted physical

phone devices FERDAUS built and delivered to the UCEs. The FBI Explosives Unit determined that FERDAUS' modified mobile phones are components of an IED detonation device. More specifically, the FBI Explosives Unit has concluded that the mobile phone devices FERDAUS built and delivered to the FBI UCEs whom he believed to be al Qaeda operatives constitute the electrical switch or trigger component of an IED, which could be used to trigger an explosion as FERDAUS had intended.

surveillance and obtained FERDAUS' phone and e-mail records, which documented FERDAUS' efforts to procure components for his attack plans.

11. During recorded meetings with the CW and UCEs, FERDAUS stated that he planned to attack the Pentagon using model airplanes similar to "small drone airplanes" filled with explosives and guided by global positioning system ("GPS") equipment. In or about April 2011, FERDAUS expanded his plan to include an attack of the U.S. Capitol Building. In May and June 2011, FERDAUS delivered two thumb drives to the UCEs, which contained detailed attack plans with step-by-step instructions as to how FERDAUS planned to attack the Pentagon and the U.S. Capitol Building using three remote controlled aircraft and 6 people, including himself whom he described as an "amir," i.e., an Arabic term meaning leader. In May 2011, FERDAUS traveled to Washington, D.C., conducted surveillance and took photographs of his targets (Pentagon and Capitol Building), and identified and photographed sites at the East Potomac Park from which to launch his airplanes filled with explosives. Between May 2011 and September 2011, FERDAUS researched, ordered, and acquired (with the financial assistance of the UCEs) necessary components for his attack plans, including one remote controlled aircraft (F-86 Sabre), 25 pounds of C-4 explosives, 6 fully-automatic AK-47

assault rifles (machine guns), and grenades.⁴ For the purpose of ordering the F-86 Sabre, FERDAUS created a false identity, "Dave Winfield." He opened a PayPal account under this false identity and even created a cover story explaining why he was seeking to buy this plane. FERDAUS told representatives of a Florida distributor that he was purchasing the plane for his son. (FERDAUS is unmarried and has no children). In June 2011, FERDAUS also rented a storage facility in Framingham, Massachusetts, under a different false name, to use to build his attack planes and maintain all his equipment. Indeed, this is where FERDAUS told the UCEs he built the detonation devices he supplied to them for the purpose of killing U.S. soldiers.

12. Moreover, during numerous recorded meetings with the UCEs, FERDAUS revealed his motivation in committing these attacks. FERDAUS told the UCEs that he realized more than a year ago⁵ from viewing jihadi websites and videos⁶ "how evil" America is and that jihad is the solution. As a result, he decided to, in his own words, "terrorize" the United States by attacking

⁴As described below, FERDAUS ordered the explosives and firearms from the UCEs who supplied FERDAUS the materials he had requested at the last meeting shortly before his arrest.

⁵At a time which predates his meetings with both the UCEs and CW.

⁶In this context, "jihadi websites and videos" refers to websites and videos promoting violence against non-Muslims, including the United States and other western countries.

Washington, D.C. FERDAUS indicated that by so doing, he wanted to "decapitate" the U.S. government's "military center" and to "severely disrupt ... the head and heart of the snake." FERDAUS further envisioned causing a large "psychological" impact by killing Americans, including women and children, whom he referred to as "enemies of Allah." FERDAUS also expressed excitement at the prospect of gunning down politicians at the Capitol Building. Most recently, FERDAUS confided that he has no interest in "making money;" his only desire is, in his own words, to "change the world" using the skills Allah has given him to strike the "infidels" by carrying out his planned attacks and building bomb components to kill the "kafir armies." FERDAUS' desire to attack the United States is so strong that he confided to the UCEs: "I just can't stop; there is no other choice for me."

FACTS SUPPORTING PROBABLE CAUSE

13. Initially, FERDAUS met and engaged in conversations with an FBI CW⁷ regarding his planned attacks against the United States. These conversations occurred between December 2010 and April 2011; the majority of them were consensually recorded. Beginning in March 2011, FERDAUS began meeting with the UCEs and continued to meet with them until his arrest on September 28, 2011. Below is a description of several, but not all, of these meetings and the actions taken by FERDAUS to complete his planned

⁷The CW has a criminal record and has served time in prison.

attacks against the United States.

14. On January 7, 2011, FERDAUS met with the CW. This meeting was recorded. During this meeting, FERDAUS told the CW that he was planning to attack the Pentagon using explosive filled drone airplanes "to disable their [the United States'] military center." FERDAUS explained to the CW:

It's a small, drone aircraft that would be programmed at that target and it can just hit that ...a model airplane that can carry a good enough payload and it will detonate on impact.

15. Additionally, during the January 7, 2011 recorded meeting, FERDAUS asked the CW how much it would cost to procure 10 AKs, which refers to AK-47 assault rifles. FERDAUS asked the CW how much it would cost to procure grenades and whether the CW could procure enough explosives for an "improvised device." With regards to an improvised explosive device, FERDAUS stated that "the detonators are easy" and explained to the CW that he (FERDAUS) would only need a spark plug, mechanical switch, and cell phone.

16. On January 11, 2011, at FERDAUS' suggestion, the CW drove to FERDAUS' house and picked FERDAUS up so they could talk. During this recorded meeting, FERDAUS requested the CW's assistance in his planned attack on the Pentagon and said that his goal for the sake of Allah was "to make the plan, to build up the resources and do it right." In particular, FERDAUS asked the CW if he could "obtain highly explosive powder and those [sic]

type of stuff" for him. FERDAUS also asked the CW whether he (CW) had "a connection that would be able to gather, ah, some material where we can build some of the explosive enough to take out a target that's like three football fields, say a radius, of one or two blocks?" The CW responded that he (CW) would have to get back to him. FERDAUS instructed the CW to "learn about that, that's important." FERDAUS further advised the CW that after using the explosives, they would "carry out the rest" of the plan using "AKs" because "once we cut off the military, we can take care of the politicians ..."

17. In addition, during this conversation, the CW asked FERDAUS "why [he wanted] to blow [up] the Pentagon." FERDAUS responded:

because that, that's the target to eliminate and terrify all enemies of Allah. We have this project started ... This is, this is what we have to do. This is the righteous way ... [to] terrorize enemies of Allah.

18. On January 20, 2011, the CW met with FERDAUS. At this recorded meeting, among other things, FERDAUS told the CW that he (FERDAUS) was considering attacking a subway station, the Capitol Building, and a military base in Colorado in addition to the Pentagon and that "it would be nice to ... gun down some politicians..." FERDAUS advised the CW that "[t]he main thing" he (FERDAUS) needed was "high powered explosive stuff." FERDAUS also inquired about the price of grenades. FERDAUS also told the

CW that they needed to get "a model airplane that can carry enough weight, and ... it's programmed, so when it hits the coordinates, ... it will detonate the bomb and that's it."

19. In addition, during the January 20, 2011 meeting, FERDAUS advised the CW that he (FERDAUS) was considering building his own improvised explosive device if he (FERDAUS) could not raise enough money to buy high powered explosives and using such a device to attack a subway station. The CW asked FERDAUS why he (FERDAUS) wanted "to do that." In response, FERDAUS stated:

cause that would be a huge scare. A huge attack. The point is you want to scare them so they know not to mess with you... All the kafir [non-believers], in this land, are enemies and if you ... they're all, they're all part of it. They have ... have killed from us, our innocents, our men, women, and children, they are all enemies.

20. On March 2, 2011, FERDAUS met with the CW. At this recorded meeting, the CW met FERDAUS at his house. FERDAUS showed the CW electrical components and remote controlled cars that he had built and indicated that he "used to be into robotics" and enjoyed "exploration -- taking stuff apart, trying to do electronics, [and] learning on my own. I learned a lot of stuff on my own ... from doing it and reading, too."

21. During this meeting, among other things, FERDAUS advised the CW that he (FERDAUS) needed to "find out how much [weight the remote controlled] airplanes can hold." FERDAUS also explained to the CW that he planned to fill the "airplanes" with

either "a particular home-made device or ... handheld [grenades]."

22. At FERDAUS's request, on March 4, 2011, the CW took FERDAUS to a public library so that FERDAUS could conduct research on remote controlled aircraft. This meeting was recorded. While at the library, using the library computers, FERDAUS located a number of websites that sold remote controlled planes and learned that such planes could carry approximately 38 to 42 pounds. After completing his research but before leaving the library, FERDAUS erased the browser history on the computer he was using and then visited several other websites as a means of evading detection. When FERDAUS and the CW returned to the CW's vehicle, FERDAUS asked the CW, "How much do you think one grenade weighs?" The CW responded that he did not know. FERDAUS then opined that a grenade might weigh "less than a pound." FERDAUS concluded that it would be cheaper to make his own explosive.

23. After leaving the library, the CW took FERDAUS to three stores where they purchased a spark plug, a relay, a 9 volt battery, and ammonia. In addition, among other things, during this meeting, FERDAUS asked the CW to get him "the AK (referring to an AK-47 assault rifle) ... so I can practice. So I can learn how to do it." FERDAUS suggested that he and the CW "go into the woods somewhere and we'll just practice [shooting]."

24. On or about March 9, 2011, the CW introduced two UCEs to FERDAUS as "brothers" who were "down with the cause." While eating lunch at a restaurant with the UCEs, FERDAUS described to the UCEs his plan to attack the Pentagon using a remote controlled aircraft filled with explosives. This meeting was recorded.

25. On March 16, 2011, FERDAUS met with the CW. During this recorded meeting, FERDAUS talked to the CW about the "other brothers," i.e., the UCEs. FERDAUS told the CW that the other brothers probably have their own plans, which he would consider, but that he thought his idea was preferable. FERDAUS asked for the CW's support of his Pentagon attack plan and suggested that they should both put their money together to buy the remote controlled aircraft. In addition, FERDAUS advised the CW that he was still working on building the detonator for the explosives.

26. On March 18, 2011 and March 23, 2011, FERDAUS met with the CW. During these recorded meetings, among other things, FERDAUS explained to the CW how he (FERDAUS) planned to detonate the remote controlled aircraft by hooking up a cell phone to a rocket motor, which would contain explosive powder and could be used as the "preliminary boom." At FERDAUS' direction, the CW drove to Toys 'R' Us where FERDAUS bought a rocket and rocket motors to test out his plan. FERDAUS advised the CW that his purpose in buying the rocket was purely "a diversion" (i.e., so

as not to highlight his purchase of the rocket motors).

27. On March 28, 2011, FERDAUS discussed with the UCEs and CW, in the UCEs' vehicle, the progress he had made on his plan to attack the Pentagon. This conversation was recorded. Among other things, FERDAUS stated that while in New York the prior weekend, he went to an Internet place (which from the context and FERDAUS' prior conversation with the CW, I believe refers to an Internet café) and conducted research "in a way that's more secure." FERDAUS indicated that he found a website that sells remote controlled aircraft that can fly 100 miles per hour and carry a payload of up to 50 pounds. FERDAUS explained the plane would be filled with 10 grenades and that he would fly the plane using a built-in GPS system. FERDAUS further advised that such an aircraft costs less than \$3,000. In addition, FERDAUS expressed his desire to go overseas for training.

28. On March 29, 2011, FERDAUS met with the UCEs without the CW. During this recorded meeting, the UCEs questioned FERDAUS about his willingness to carry out his plan. FERDAUS told the UCEs that he wanted to attack the Pentagon and stated that no one was forcing him to do it. FERDAUS further explained that he believed his plan was "within my unique capability" and that he wanted "to contribute to victory for the sake of Allah."

29. In addition, among other things, during this meeting, FERDAUS explained that he had this idea of attacking the Pentagon

long before he met the CW (and by implication before he met the UCEs). FERDAUS advised the UCEs that he had initially discussed his remote controlled aircraft attack plans with a friend from Dorchester. FERDAUS told the UCEs that his Dorchester friend had a "less complicated idea" -- his friend's idea was to "just get weapons and go after ... a recruitment center." The UCEs asked FERDAUS what was wrong with that idea, to which FERDAUS responded: "nothing." FERDAUS indicated, however, that he wanted "to go bigger." Lastly, FERDAUS advised the UCEs that he was interested in traveling to Afghanistan and assisting the "overseas brothers"⁸ in a technical manner, whether by teaching physics or making something with technology.

30. On April 6, 2011, during a recorded meeting with the CW, FERDAUS confided in the CW that he intended to go overseas after his planned attack to train with other "brothers." Among other things, during this meeting, FERDAUS also discussed his planned attack with the CW. In so doing, FERDAUS mentioned that although he still desired to attack the Pentagon, he wanted to conduct a second attack on the U.S. Capitol Building, which he described as a smaller target. With regard to his plan to attack the Capitol Building, FERDAUS stated that he would fly the second

⁸In the context of this conversation, I believe "overseas brothers" refers to individuals overseas who share FERDAUS' ideology and are engaged in violent jihad against those viewed as non-believers.

plane right into the center of the dome, which would cause it to cave in. FERDAUS advised the CW that he would have to take a bus trip to Washington, D.C., to find a place from which to launch the planes.

31. FERDAUS concluded the April 6, 2011 meeting with words of encouragement for the CW:

nations that were bad, very bad groups of individuals, like say Sodom ... they be punished with some type of natural disaster. Maybe stones would come from the sky or they get a flood, they get drowned out. For us, we've gotta [sic] do that. Allah has given us the privilege ... he punishes them by our hand. We're the ones.

32. On April 18, 2011, during a recorded meeting with the UCEs, FERDAUS indicated that he understood that he needs to show the UCEs "technological progress" if he wished the UCEs "to propose" his plan to the other brothers. (In prior meetings with FERDAUS, the UCEs had told FERDAUS that they and "brothers" overseas might be able to provide financial assistance for his attack plan.) FERDAUS advised the UCEs that he now wanted to fly two planes into the Pentagon and one plane into the Capitol Building.⁹ FERDAUS described his plan to the UCEs as "simple:" "My plan is to have a fast model airplane with a GPS system

⁹During the recorded meetings with the UCEs, FERDAUS often referred to the Pentagon as the "P-Building" and the U.S. Capitol Building as the "C-Building."

stuffed with handhelds¹⁰ and it's on a timer and it ... has the coordinates of the targets... All it has to do is crash into the target." FERDAUS further advised the UCEs that this plan was "within [his] reach" and capabilities. In addition, during this meeting, the UCEs inquired as to whether FERDAUS had done research on his targets. FERDAUS replied that he needed "to do more reconnaissance."

33. On April 19, 2011, FERDAUS met the UCEs. This meeting was recorded. During this meeting, the UCEs questioned the feasibility of FERDAUS' plan, noting that he (FERDAUS) had "nothing tangible." FERDAUS responded in a defensive manner that he had made progress; said that he knew where to get two of the three components he needed for his plan, and said that all he needed to do was secure some funding. FERDAUS acknowledged that he needed to obtain information regarding the launch sites. FERDAUS, however, described his plan as "very close" to completion. During this meeting, with the financial assistance of the UCEs, FERDAUS purchased a plane ticket to travel to Washington, D.C. on May 13, 2011.

34. Additionally, during the April 19, 2011 meeting, FERDAUS described to the UCEs what he hoped to accomplish with his planned attacks. With regard to the Pentagon attack, FERDAUS

¹⁰In conversations with the CW and the UCEs, FERDAUS used the terms "grenades" and "handhelds" interchangeably.

stated:

What I envision is that it's going to ... essentially decapitate the entire empire. [It will be the] final nail in the coffin... because it's going to ... severely disrupt the head and heart of the snake.

With regard to the Capitol Building, FERDAUS described this target as a softer target and that he wished to hit it in the "right place, say the dome" so as to "decapitate ... business as usual" and have a "psychological" impact.

35. On May 3, 2011, UCE1 called FERDAUS and advised FERDAUS that he was coming to Boston on May 5, 2011. During this conversation, UCE1 also told FERDAUS that "a lot of things have changed ... My boss has just been killed." This was a reference to the fact that Usama bin Laden had been killed on May 1, 2011.

36. On May 5, 2011, UCE1 met with FERDAUS. UCE1 began this recorded meeting with FERDAUS by stating that "right now things are pretty rough" with the death of "our boss." As UCE1 had told FERDAUS numerous times in prior meetings, UCE1 again advised FERDAUS, "You don't have to do this." To ensure that FERDAUS understood who he was "dealing with," UCE1 asked FERDAUS, "who do you think me and brother Hussein are?" FERDAUS responded:

I think you guys are wonderful brothers; and I feel utterly privileged to have met you ... men of the past ... excellent men of the past. And to be more specific, I think you are al Qaeda.

37. After demonstrating his understanding that he was meeting and working with al Qaeda operatives, FERDAUS told UCE1

that he had performed research for his plans and prepared "a report" for UCE1. In constructing his report, FERDAUS indicated that he "tried to cover as much ground as possible." FERDAUS handed UCE1 a thumb drive, which FERDAUS explained to UCE1 contained a narrative of his planned attack as well as photographs of his targets -- the Pentagon and Capitol Buildings -- and launch sites. Included on this thumb drive was also information FERDAUS downloaded from the Internet regarding his preferred aircraft, the F-4 Phantom remote controlled aircraft, and pictures and specifications of grenades, the explosives he planned to use in the aircraft.

38. In addition to giving UCE1 an electronic copy of his plan, during the May 5, 2011 meeting, FERDAUS described his attack plan to UCE1. FERDAUS indicated that he had identified an "excellent location" from which to launch his planes and chosen an aircraft attack vehicle, the F-4 Phantom, which according to FERDAUS was a "1/10th model" of the U.S. military Phantom. FERDAUS told UCE1 that his plan required the purchase of three F-4 phantoms. FERDAUS explained to UCE1 that he could use "Google Earth ... to pick the coordinates" as the plane would be flown using "GPS."

39. FERDAUS described the flight plans for the three F-4 Phantoms. The "trajectory" of the first plane was to be the Capitol Building, which FERDAUS intended to hit "at the middle of

the dome," "blow[ing] the dome to smithereens." With regards to the second and third planes, FERDAUS indicated that the "trajectory" of those planes was "opposite" sides of the Pentagon at the "altitude of ... the fourth floor." FERDAUS stated that each plane would be filled with 16 grenades. FERDAUS further advised UCE1 that the timing of the detonation for all three planes would be "three seconds prior to ... impact" using a "detonation servo"¹¹ device, which would cause "all the pins [of the grenades] ... [to] get pulled out." FERDAUS also indicated that he "need[ed] to be able to see what's on the ground" in Washington, D.C. to finalize his plans.

40. In addition, during this meeting, FERDAUS described to UCE1 his goals in committing this planned attack. FERDAUS told the UCE that his plan "ought to terrorize ... it ought to result in the downfall of this entire disgusting place. Okay, and that's the goal." UCE1 noted the likelihood that FERDAUS' attack might kill women and children. In response, FERDAUS explained that "every kafir [non-believer] is an enemy;" therefore, "every kafir [sic] blood is okay." In other words, to FERDAUS, it is permissible to kill women and children.

41. FERDAUS repeatedly emphasized to UCE1 the feasibility of his plan during this meeting. For instance, FERDAUS stated:

¹¹FERDAUS also referred to this device during the meeting as a "high torque servo."

"This is realistic... I can make these things happen." FERDAUS also told UCE1 that his plan was "extremely feasible and something that I really want to do." FERDAUS, however, acknowledged that although he "was trying to do explosives," he needed assistance in obtaining the explosives and asked that UCE1 get him "48 of the most powerful handhelds [grenades] that you can find." FERDAUS also indicated that he could accomplish his attack plan, which in FERDAUS' words would be "the achievement of a lifetime," on a quicker timetable with the financial assistance of the UCEs.

42. Lastly, at the May 5, 2011 meeting, FERDAUS demonstrated for UCE1 a mobile phone detonation device that he had built. FERDAUS described to UCE1 how it worked and indicated that he "can instruct" others how to put such devices together.

FERDAUS' MAY 5, 2011 ATTACK PLAN

43. I have reviewed FERDAUS' May 5, 2011 written attack plan, which he provided to UCE1. This plan is extremely detailed, well-written, and annotated with numerous pictures (copied from encyclopedias or resource materials from library and the Internet) and diagrams. FERDAUS' plan contains an introduction, entitled "**ABSTRACT**," which states as follows:

The concept is to utilize certain resources seeking the objective of sending 3 aircrafts [sic], 1 to the C-building and 2 to the P-building at particular locations on each, from a similar location, with an effective payload, and all on autopilot. This requires the collaboration of hardware, software, payload and

location setups meeting specifications relative to achieving this end. This document shall discuss the specifics of each component with respect to its mission characteristics. As well, as a [sic] financial assessment shall be included.

44. FERDAUS's written plan is then divided into the various components of his plan: (1) The Aircraft; (2) Autopilot Hardware; (3) Hardware and Aircraft Configuration; (4) Software Overview; (5) Software Procedure (Mission); (6) Location (with highlighted maps, pictures, and diagrams); (7) Payload; and (8) Total Financial Estimate.

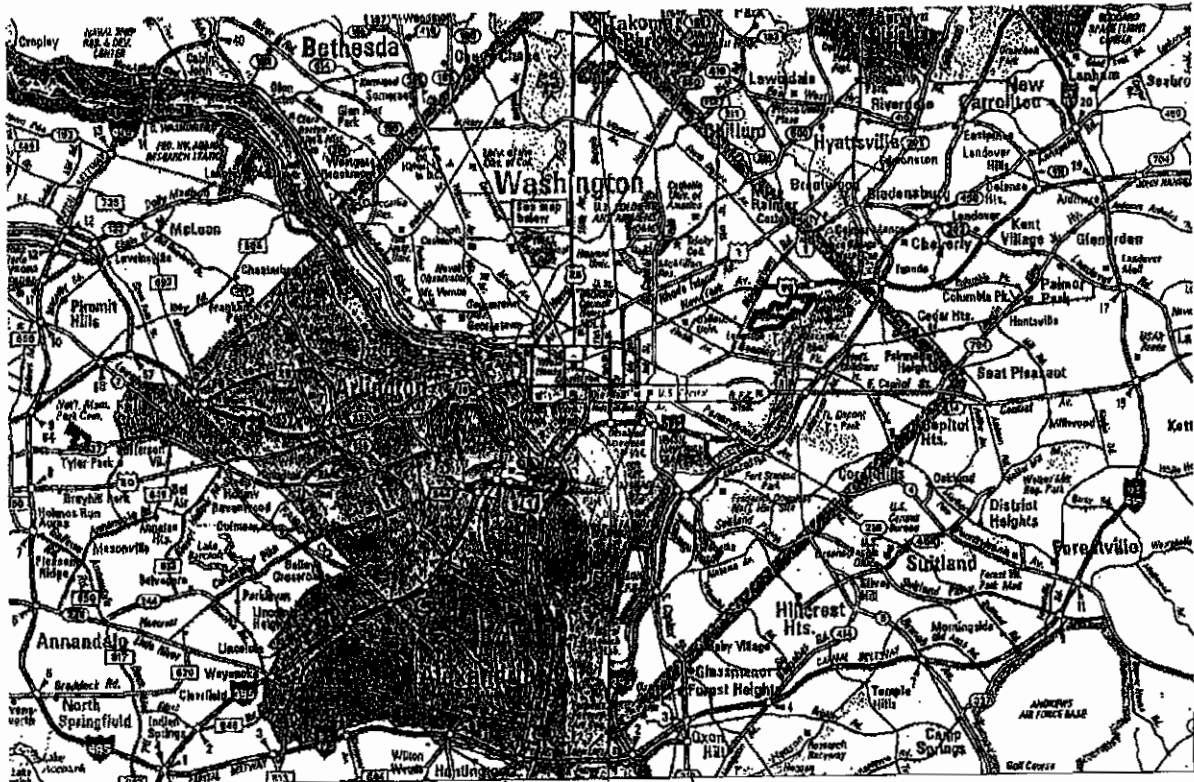
45. With regard to "The Aircraft," FERDAUS wrote:

The preferred aircraft as viewed on the website www.scalercmodels.com, granted there is still an availability[,] is the F-4 Phantom II, a scale model of the McDonnell-Douglas F-4 Phantom II.... It is a 100%, 1/10 scale model ... [with] speeds up to 160 mph [and its dimensions are] 68 in. Length 44 in. Wingspan.

46. With regard to "Autopilot Hardware," FERDAUS states that "it can come fully assembled, and with a gps" and "runs on programmable software that can execute such modes as autopilot where it can fly the aircraft to already entered gps coordinates."

47. The "Location" portion of FERDAUS' plan included highlighted maps, diagrams, and photographs of the Pentagon and Capitol Building as well as the launch site. For example, the text and highlighted map on the next page appear in FERDAUS' plan describing the location from which FERDAUS intended to launch his explosive laden planes.

Location: A location in the vicinity to the targets has been located.

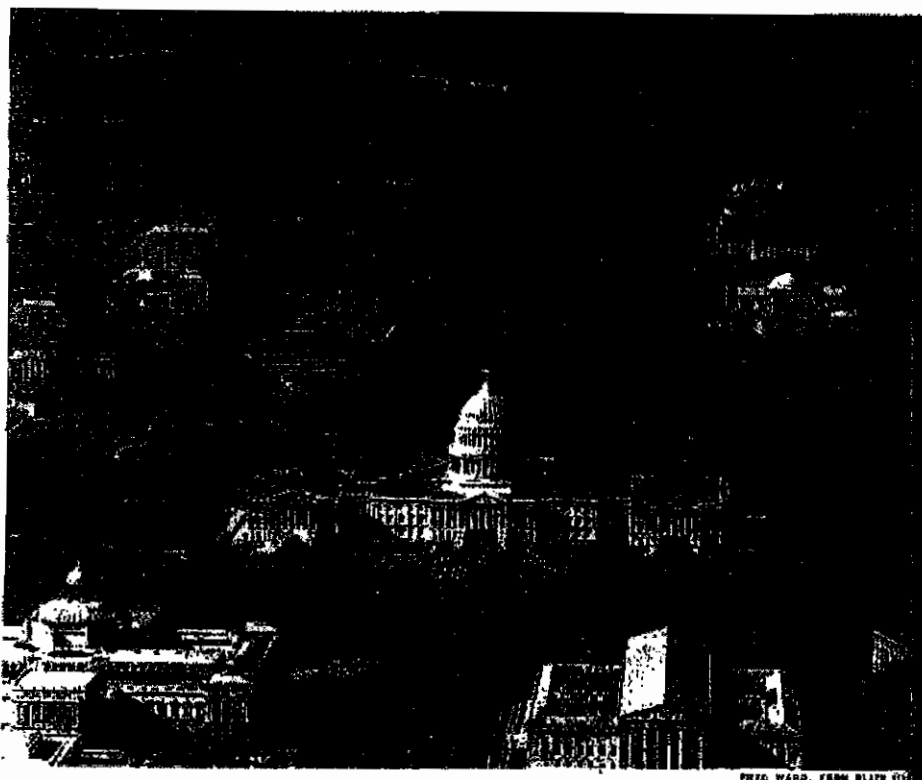


3. (~3mi) 2. (~2mi) 1. (~2mi)

48. Similarly, photographs with superimposed arrows and text describing exactly where FERDAUS intended to strike his targets with his attack aircrafts were also included in his plan. These photographs and the pertinent text are reproduced on the following page.



Now here is a look at the P-building. Notice the washington monument in the back. The building is 5 stories high, and sits in 29 acres with a 5 acre ground in the middle. The circumference is 1 mile. To the right is the destination of aircraft 2. To the left is the chosen destination of aircraft 3. Both are to be on the middle of the sides and at a level where it can arrive on the 4th story.



This is a look of the back end facing east. The striking point would be on the side and at the level above. The width where the dome stands is 145ft, 44m, and that could mean the circle or its individual building or more. Notice the washington monument at the far west. This is the destination of aircraft 1.

49. In the "Payload" section of his plan, FERDAUS stated that each aircraft could "have a payload capacity of 10-12 lbs., and thus it is deemed to contain 16 handhelds [grenades] in each." FERDAUS illustrated for the reader, using a diagram, how 16 grenades would be arranged within each of his three aircraft. FERDAUS further explained how the grenades would be detonated using a "high-torque servo motor." FERDAUS also included on the thumb drive pictures and specifications for several light weight grenades that could be used in his plan.

50. On May 13, 2011, FERDAUS flew from Boston to Washington, D.C. to conduct surveillance and to photograph his targets and launch sites. He returned to Massachusetts on May 15, 2011. During his trip to Washington, D.C., FBI agents observed and photographed FERDAUS conducting surveillance and taking pictures of the Pentagon, Capitol Building, and Eastern Potomac Park (his proposed launch site).

51. On June 9, 2011, FERDAUS met with the UCEs. UCE1 picked FERDAUS up in Ashland and drove him to a hotel in Framingham where they met UCE2. During this meeting, FERDAUS advised the UCEs that he made a thumb drive for them containing his expanded plan and photographs from his Washington, D.C. trip. At the hotel, using his computer, FERDAUS previewed these materials with the UCEs. After reviewing these materials with the UCEs, the UCEs drove with FERDAUS to a Framingham storage

facility FERDAUS had selected to build and maintain the components for his plan. All of these conversations were recorded.

52. After getting into the UCEs' vehicle, FERDAUS told UCE1 that he had brought a mobile phone detonation device for the UCEs.¹² In response, UCE1 told FERDAUS that UCE2 had plans for the phone and was hoping to get more phones from FERDAUS to use in operations overseas targeting U.S. troops pulling out of Iraq. FERDAUS responded positively to that idea: "That sounds excellent... I can generate more of those devices." FERDAUS acknowledged that his phone detonation devices would help the "brothers" overseas and advised UCE1 that, provided that he could find "the right model [phone],¹³ it wouldn't take much time at all" to build them. Later, during the meeting at the hotel with UCE2, FERDAUS explained that this detonation device might require an additional power source such as a 9 volt battery to cause an

¹²At the May 5, 2011 meeting, FERDAUS had demonstrated a similar "experimentation" detonation device he had built. To build this detonation device, as explained above, FERDAUS purchased a cellular phone, unscrewed the back cover of the phone, and then soldered wires to the phone. FERDAUS explained to UCE1 that when the cellular phone's number is dialed, the phone would send an electrical current through these wires, which would act as the "electrical switch" triggering the detonation for an IED. FERDAUS hid the wires inside the phone for purpose of sending it overseas.

¹³FERDAUS had explained to the UCEs that some phone models were easier to take apart than others.

explosion.¹⁴

53. After entering the hotel and greeting UCE2, FERDAUS explained to both UCEs how he came up with the idea to prepare his May 5, 2011 attack plan in writing. FERDAUS decided to write a report to answer any questions that "came to [his] head" and "figure out everything ... it takes to build these aircrafts ... including the load, which is going to be some type of explosive." FERDAUS indicated that his original plan contained "every last detail" as to how the plan will work and that the only thing he had left to do on the original plan was "reconnaissance." FERDAUS advised the UCEs that since last meeting UCE1 in May, he had completed the reconnaissance necessary for the execution of his plan. He had arrived in Washington, D.C. on Friday, May 13, 2011, and left on Sunday morning.

54. During the June 9, 2011 meeting, FERDAUS described in detail how he came up with his idea to attack the United States on his own "a real long time ago," before meeting either the UCEs or CW. FERDAUS stated the following:

A real long time ago before I met you guys I was walking through the woods one day and I thought I want to do some type of aerial plan. It came to me that I should do some type of aerial assault on particular targets and after a while it all came to me that I should do the P-building as a target and afterwards the C-building as a target and I should continue with this

¹⁴During the meeting on this subject, FERDAUS and the UCEs discussed that such a refinement of the device could be done overseas so as to avoid detection in transit.

the aerial assault.

I already knew about this technology [referring to the remote controlled aircraft] from previous research going on the internet and I was, like, this is perfect. This could easily work.

FERDAUS further advised the UCEs that he considered this technology (i.e., remote controlled aircraft) "quite simple" and noted that although "you do need to have a certain aptitude ... I've been doing this type of stuff since I was a little kid."

55. In addition, during this meeting, FERDAUS told the UCEs that during his trip to D.C., he conducted extensive surveillance of the Pentagon and even walked in a restricted area. As a result, FERDAUS decided that "more stuff ha[d] to be done;" his plan needed to be expanded so as to "totally ... cut out ... everything of the snake." Thus, FERDAUS decided to couple his "aerial assault" plan with a "ground directive." FERDAUS indicated that his ground assault involved the use of six people, armed with automatic firearms and divided into two teams.

FERDAUS described his expanded attack as follows:

with this aerial assault, we can effectively eliminate key locations of the P-building then we can add to it in order to take out everything else and leave one area only as a squeeze where the individuals will be isolated, they'll be vulnerable and we can dominate.

Once isolated, FERDAUS planned to "open up on them" and "keep firing" to create "chaos" and "take out" everyone. FERDAUS provided the UCEs an electronic version of his new expanded plan

on a thumb drive, which he summarized during this meeting.

56. Although FERDAUS initially planned to use grenades as the explosive component in his attack planes, during this meeting, FERDAUS advised the UCEs that he thought it would be "better" to use homemade explosives rather than grenades. Because of public safety issues, the UCEs admonished FERDAUS not to experiment with any chemicals or to attempt to create his own homemade explosives.

57. Lastly, among other things, during this meeting, FERDAUS told the UCEs that he researched storage facilities and located one in Framingham to use to receive and store the components for his plan and build/design the aircraft. FERDAUS advised the UCEs that he had spoken to the manager of the storage facility and told the manager that FERDAUS intended to use the rented space for "music."

JUNE 9, 2011 SURVEILLANCE REPORT AND EXPANDED ATTACK PLAN

58. I have reviewed the contents of the thumb drive FERDAUS gave to the UCEs at the June 9, 2011 meeting. This thumb drive contained a detailed report of FERDAUS' Washington, D.C. trip documenting every aspect of his trip (i.e., every location he visited, what he observed, people he encountered, how he accessed the locations, and the photographs he took)¹⁵ and his expanded

¹⁵An example of one of the photographs he took of the Pentagon is attached hereto as Exhibit 3.

attack plan. In his June 9, 2011 attack plan, FERDAUS stated that the "[o]verall goal is to shut down this target [referring to the Pentagon] by eliminating key entrances/exits and as many individuals as possible." FERDAUS' attack plan includes an "Order of Actions" divided into fifteen separate phases or "steps" detailing what actions would occur during each phase of the attack, as well as a time table.

59. On June 15, 2011, FERDAUS called UCE1 and requested that UCE1 wire him money so he could start working on obtaining the components for his attack plan. Later on June 15, 2011, FERDAUS provided UCE1 with the name, location, and phone number of the money transmitter to which FERDAUS wanted UCE1 to send the money.

60. On June 17, 2011, FERDAUS told UCE1 during a telephone conversation, which FERDAUS had initiated, that he was "100%" committed to the plan and that he "really want[ed] to get the custom cars." Based upon the context of this conversation, I believe that "custom cars" refers to the remote controlled aircraft FERDAUS planned to use to attack the Pentagon and Capitol Building. In addition, during the June 17, 2011 telephone conversation, FERDAUS also asked UCE1 to provide him (FERDAUS) with \$450 so that FERDAUS could rent storage space to build and maintain his attack aerial vehicles. Later that day, using money supplied by UCE1, FERDAUS rented a storage unit at a

storage facility in Framingham, Massachusetts under a false name.

61. On June 20, 2011, FERDAUS left a coded message on UCE1's phone stating the following:

Are we good to go on vehicles [i.e., the remote controlled aircraft]? The customers want to know and also if I am able to fix the engine and the transmission can you do everything else [this refers to obtaining the explosives and weapons for FERDAUS' attack plan] to have in time for when the customer wants it? They really want it bad on that date because they want to take it ... There is a car show actually that they have.¹⁶

62. On June 27, 2011, FERDAUS met with the UCES. Like the prior meetings, this one was recorded. Shortly after getting into the UCES' vehicle, FERDAUS told the UCES "I want to give you guys some little gifts here, okay, one for each of you -- one for ... [UCE1] and one for ... [UCE2]."¹⁷ FERDAUS handed UCE2 another cell phone detonation device and handed UCE1 a key to the space FERDAUS had rented at the Framingham storage facility. FERDAUS explained to the UCES that the phone "can be used overseas" because it was "unlocked." FERDAUS tested the phone in the presence of the UCES using LED lights to demonstrate that it would work and trigger an explosion if plugged into an IED. In reference to building the device, FERDAUS assured the UCES, "I

¹⁶Originally, FERDAUS had indicated that he wanted to launch his attack on July 5, 2011 to coincide with the Independence Day holiday.

¹⁷The undercover names of the FBI UCES have been redacted.

did this all by myself."

63. After FERDAUS had delivered and demonstrated the cellular phone detonation device (his second such delivery), the UCEs falsely advised FERDAUS that the other phone detonation device he had supplied had "worked." The UCEs falsely told FERDAUS that his device had killed three U.S. soldiers and injured four or five others. FERDAUS was visibly excited by this news and told the UCEs he felt "incredible ... we're changing the world." The UCEs asked FERDAUS whether he was okay with killing people. FERDAUS responded "yes" and indicated "I could ... get two more [phones] today." FERDAUS advised the UCEs that the phone he had just delivered to them was the "same exact build as the other [phone]" but it "might even work better" than the other one because the "current might be higher than the other one."

64. Later during this meeting, UCE1 advised FERDAUS that they needed two more phone detonation devices because the "brothers" overseas wanted to do at least two more "roadsides." FERDAUS told the UCEs that he was "100%" at "peace" with the fact that his devices are killing American soldiers. FERDAUS stated,

this is exactly what I wanted and I feel so blessed...
I feel that I'm seeing the fruits of my labor... I want
to work with you guys and I want to hit the snake on
the tail and I want to choke it right in the head ...
The world will never be the same.

65. Additionally, the UCEs and FERDAUS discussed whether grenades are indeed the best explosive to be used in the aircraft

attack vehicles FERDAUS was constructing. FERDAUS concluded that it would be "excellent" to use plastic explosives rather than grenades provided they are "obtainable." Because the UCEs instructed FERDAUS not to experiment with any chemicals, FERDAUS said that he was relying upon the UCEs to obtain the explosives. FERDAUS told the UCEs that he also needed two vans, six "automatics," a side arm with a silencer, and nine grenades for his attack plan. The UCEs asked FERDAUS to describe what he meant by "automatics." FERDAUS explained that he wanted fully automatic firearms, which you "squeeze and [they] keep going." FERDAUS also told the UCEs that what he wanted was "good machine guns that are ... of good weight and good use."

66. FERDAUS then brought the UCEs to the storage unit FERDAUS had rented in Framingham so the UCEs could inspect it. FERDAUS advised the UCEs that he had paid for the unit in cash and had to fill out some paperwork but avoided providing an address by telling the storage manager that he was "homeless" and "sleeping at a friend's house."

67. On July 21, 2011, FERDAUS met the UCEs. During this recorded meeting, FERDAUS advised the UCEs that he had ordered two more phones online and he identified a supplier of "fully assembled" remote controlled planes "in Florida." FERDAUS forwarded to UCE1 via e-mail a copy of price quotes he had received under the false name of "Dave Winfield," for two Sabre

(F-86) remote controlled aircraft and one F-4 Phantom aircraft. FERDAUS explained that he intended to purchase the F-4 Phantom to use to attack the C-building while the two Sabres would be used to attack the Pentagon. FERDAUS advised the UCEs that he planned to order one Sabre plane first. FERDAUS told the UCEs that this plane would be delivered to the storage facility.

68. FERDAUS indicated that he had numerous telephonic conversations with plane distributor in Florida. In these communications, FERDAUS advised that he had made up a cover story for his plane purchases. FERDAUS told the plane distributor that he was planning to purchase the planes for his son. (FERDAUS is unmarried and has no children).

69. During this meeting, UCE1 gave FERDAUS \$4,000 in cash to place the order for the F-86 Sabre, which FERDAUS in turn deposited into his bank account and then transferred to a PayPal account held under an alias. After conducting these transactions, FERDAUS allowed UCE1 to look up FERDAUS' PayPal account information. FERDAUS provided UCE1 both the e-mail and password for his PayPal account. FERDAUS' PayPal account history verified that FERDAUS (under the name Dave Winfield) had indeed placed an order for the plane, that a \$3,000 payment to the plane distributor was then pending, and that FERDAUS had ordered two phones using his PayPal account for a total price of \$49.50.

70. In addition, during this meeting, FERDAUS explained

that "because [he] want[ed] to blow up parts of the building ... [referring to the Pentagon] and make it so it can't be used ... so instead of using those grenades ... I think we should try to use something that's like a plastic [explosive]." FERDAUS told the UCEs that he wanted to maximize the explosive impact of his attack planes and thus, wanted the UCEs to get him "24 pounds" of plastic explosives. 15 pounds of the explosives were for the planes -- "5 pounds" per plane. FERDAUS said that he planned to use the remaining 9 pounds of explosives to blow up the bridges surrounding the Pentagon. FERDAUS further advised the UCEs that, through his planned aerial and ground attack, he "want[ed] to...go for the throat, you know, we go for the center."

71. FERDAUS was anxious to know how his second detonation device had worked.¹⁸ He asked the UCEs, "Do you know how that -- the phone, the blue one, -- the other phone did?" The UCEs indicated that they believed it had been used in Iraq but didn't know the results. They assured FERDAUS that they would find out for their next meeting.

72. On August 1, 2011, FERDAUS met with the UCEs. During this recorded meeting, FERDAUS told the UCEs that he wanted to increase his production of the cellular phone detonation devices.

¹⁸Indeed, since this meeting, during numerous telephone conversations between FERDAUS and UCE1, FERDAUS has asked how his detonation device worked.

He stated:

I got this idea ... I think that I should really up the phone production [and] try to do as many phones as I can and obviously as many as we can ship across or bring across.

FERDAUS suggested that he could either send a shipment of "just the phones" and he could send the brothers overseas "instructions" on how to make the detonation devices or send them one box of "50 phones" "pre-packaged and all ready." FERDAUS indicated that he could "write instructions" or make a video on how to construct the cell phone detonation devices. In these instructions, FERDAUS told the UCEs that he could explain to the "brothers" how to make the detonation devices using different types of phones.

73. FERDAUS again asked, as he had during the July 21, 2011 meeting, whether his second phone device had worked overseas. UCE2 falsely told FERDAUS that it had worked perfectly; that it had "killed Americans and they are asking for more." FERDAUS responded "That's excellent."

74. During this meeting, FERDAUS brought and delivered three more phone detonation devices to the UCEs. The UCEs had only asked FERDAUS for two. FERDAUS advised the UCEs that he had determined that he could "really contribute" by creating cheaper detonation devices using Tracfones. Indeed, FERDAUS told the UCEs that he had gone to CVS on that day and had bought a

Tracfone on sale for less than ten dollars. FERDAUS said that he had taken this phone to the storage unit and built the detonation device before meeting the UCEs. With respect to the three devices he supplied to the UCEs, FERDAUS assured the UCEs that "once [you] dial [the] number, [they] will detonate."

75. FERDAUS advised the UCEs that he could make "20 to 30 [detonation devices] per week" at the storage unit. UCE1 questioned FERDAUS as to what he wanted to accomplish with the phone detonation devices. FERDAUS explained:

I want them [the detonation devices] to have a huge punch in a short period of time; say like 10 one day and 10 the next day and so forth ... I want to hit the kafir armies [and kill] as many people as possible... If you get a lot of them in a short period of time maybe, you're really going to hurt them hard.

UCE1 also asked FERDAUS, "what do you want to do?" FERDAUS responded,

I want to totally destroy [and] take out the enemy and kill as many as kafir [non-believers] as possible. And that's why I thought that if I could do this thing with the phone thing, we could make a huge change in the world. Imagine if our brothers were able to set off 20 phones [detonation devices] in a day at a time.

76. During this meeting, FERDAUS revealed that his jihad had

started last year. I realized I should try to do something to attack them here. I should try to go down to Washington or something like that. I should try to get them here. That is the best thing.

FERDAUS told the UCEs that from visiting and viewing jihadi

websites he "realized how ... evil" America is and that jihad is the solution. FERDAUS advised the UCEs that he is "not trying to make money;" he is "trying to change the world." FERDAUS further stated his belief that "Allah ha[d] shown [him] how to be productive." FERDAUS then stated: "I just can't stop; there is no other choice for me."

77. On August 2, 2011, FERDAUS met with the UCEs. During this recorded meeting, among other things, the UCEs provided FERDAUS with \$3500 to pay the remaining balance on the F-86 remote controlled aircraft FERDAUS had ordered. Additionally, during this meeting, FERDAUS told the UCEs that he now needs 25 pounds of what he referred to as "plastic" (i.e., plastic explosives) for his attack plan and asked them to get that for him.

78. On August 24, 2011, FERDAUS delivered 2 more detonation devices to the UCEs with the intention that they be used in attacks on U.S. soldiers located overseas.

79. On August 29, 2011, the F-86 remote controlled aircraft was delivered to the Framingham storage facility where FERDAUS rents a unit. On August 31, 2011, FERDAUS obtained the boxes containing the F-86 remote controlled airplane from the storage facility's management who had signed for the packages and moved them into his storage unit.

80. On September 20, 2011, FERDAUS made a training video

containing instructions on "how to make cell phone detonators" for the UCEs who he believed to be al Qaeda operatives. After making this video, which was filmed by one of the UCEs, FERDAUS gave an additional mobile phone detonation device to UCE2.

81. As instructed, on September 28, 2011, the UCEs obtained the explosives and firearms (25 pounds of C-4 explosives, 3 grenades, and 6 fully automatic AK-47 assault rifles) that FERDAUS had requested for his attack plan. Before delivering them to FERDAUS,¹⁹ the UCEs allowed FERDAUS to inspect them. After inspecting the components, FERDAUS brought them to his storage unit. After FERDAUS took possession of the explosives and firearms and locked them in his storage unit, FERDAUS was arrested.

CONCLUSION

82. Based on the information described above, and on my training and experience, I believe there is probable cause to conclude that REZWAN FERDAUS:

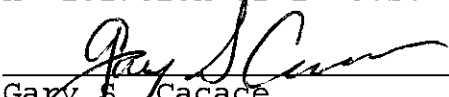
(a) from no later than in or about March 2011 and continuing until in or about September 2011, did maliciously attempt to damage and destroy buildings, to wit, the Pentagon and U.S. Capitol Building, which are owned and possessed, in whole or in part, by the United States using

¹⁹Although FERDAUS asked the UCEs 25 pounds of C-4 explosives, the UCEs only delivered 1.25 of actual C-4 to FERDAUS.

an explosive in violation of 18 U.S.C. §844(f)(1);


(b) from no later than in or about March 2011 and continuing until in or about September 2011, did, with the intent to injure, interfere with, and obstruct the national defense of the United States, willfully attempt to injure and destroy national defense premises, to wit, the Pentagon, in violation of 18 U.S.C. §2155; and

(c) from in or about June 2011, and continuing through in or about September 2011, did knowingly and unlawfully attempt to provide material support and resources (as that term is defined in 18 U.S.C. §2339A(b)(1)), to wit, detonation devices, weapons, communication equipment, training, and expert assistance and advice, to a foreign terrorist organization, namely al Qaeda, in that defendant FERDAUS provided detonation devices and a training video on how to build such devices to individuals whom he believed to be members of al Qaeda, in violation of 18 U.S.C. §2339B.



Gary S. Cacace
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me this 28th day of September 2011.



TIMOTHY S. HILLMAN
UNITED STATES MAGISTRATE JUDGE

