

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Ahmad Hassanpoor, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

I am a Special Agent with the Federal Bureau of Investigation and have been so employed since March 2020. I am currently assigned to the Washington Field Office. I received my basic field training at the FBI Academy in Quantico, Virginia. I am currently assigned to the FBI Washington Joint Terrorism Task Force (“JTTF”). My duties with the JTTF are focused on threats to National Security. I investigate federal crimes and violations concerning International Terrorism threats. As a Special Agent, I have used and am familiar with the following investigative techniques: digital evidence and investigation; consensual electronic surveillance; physical surveillance; the execution of search and arrest warrants; and the interviewing of subjects, witnesses, sources, and others who may have knowledge of a crime. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

I submit this affidavit in support of a criminal complaint alleging that RAHMANULLAH LAKANWAL (“LAKANWAL”) unlawfully transported in interstate commerce, between November 19, 2025 and November 22, 2025, a stolen firearm, having reasonable cause to believe that the firearm or ammunition was stolen, in violation of 18 U.S.C. § 922(i); and that he transported in interstate commerce a firearm with the intent to commit a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. § 924(b). This affidavit is also submitted in support of allegations that LAKANWAL violated 22 D.C. Code §§ 2101 & 4502 (first-degree premeditated murder while armed); 22 D.C. Code §§ 401 & 4502 (assault with intent to kill while armed); and 22 D.C. Code § 4504(b) (possession of a firearm during crime of violence or dangerous offense); which LAKANWAL committed on November 26, 2025, all of which are punishable by imprisonment for a term exceeding one year.

This affidavit is based on my personal knowledge, information provided to me by and through other law enforcement agents, law enforcement records, Rule 41 search warrants, witness interviews, and my training and experience, as well as the training and experience of other law enforcement agents.

Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have only set forth the facts that I believe are necessary to establish probable cause that LAKANWAL violated 18 U.S.C. §§ 922(i) & 924(b); and 22 D.C. Code §§ 2101, 401, 4502, & 4504(b).

BACKGROUND

On August 11, 2025, President Donald J. Trump issued a memorandum in his capacity “[a]s President of the United States and Commander in Chief of the District of Columbia National

Guard" that directed the Secretary of Defense to mobilize the District of Columbia's National Guard to address violent crime and to ensure public safety within the District. Presidential Memorandum, Restoring Law and Order in the District of Columbia (Aug. 11, 2025). The President also directed the Secretary to work with state governors to deploy additional National Guard units from the States to the Nation's Capital. *Id.*

On August 25, 2025, President Donald J. Trump issued a further directive that "The Secretary of Defense shall immediately begin ensuring that each State's Army National Guard and Air National Guard are resourced, trained, organized, and available to assist Federal, State, and local law enforcement in quelling civil disturbances and ensuring the public safety and order whenever the circumstances necessitate, as appropriate under law. In coordination with the respective adjutants general, the Secretary of Defense shall designate an appropriate number of each State's trained National Guard members to be reasonably available for rapid mobilization for such purposes."

The ensuing deployment has involved over 2,000 guard members that include not only the D.C. National Guard, but also units from other nine other states, including West Virginia. Working in close coordination with local and federal law enforcement agencies, guard members have patrolled such areas as the National Mall, Metro stations, the downtown retail district, and residential neighborhoods.

On November 25, 2025, Sarah Beckstrom and Andrew Wolfe, who are members of the National Guard of West Virginia, were deputized by Acting United States Marshal Ron Carter to serve as Special Deputy United States Marshals. Under the terms of their special deputation, they were deputized "to act to protect federal property and functions in the District of Columbia and to support other federal law enforcement agencies" and "to be armed with their service-issued weapons while on duty."

THE SHOOTING OF SARAH BACKSTROM AND ANDREW WOLFE

On November 26, 2025, at approximately 2:13 p.m., Sarah Beckstrom and Andrew Wolfe were on patrol near the intersection of 17th Street and I Street, Northwest in Washington, D.C. Beckstrom and Wolfe were on duty and in full uniform and were engaged in the performance of official duties. As such, Beckstrom and Wolfe were acting as officers of the United States Government and were, at the time of this event, engaged in the performance of official duties.

At approximately 2:13 p.m., two Majors in the National Guard (NG M-1 and NG M-2), who were on routine patrol supervising National Guard troops in the area, approached the victims and engaged in conversation. NG M-1 reported that he heard gunshots; as he heard gunshots, he observed Beckstrom and Wolfe fall to the ground.

NG M-1 then observed LAKANWAL, who was dressed in a knee-length, dark-colored jacket and armed with a revolver, fire additional shots. NG M-1 pulled his issued service weapon and fired shots at LAKANWAL. LAKANWAL fell to the ground where he was detained by NG M-2.

Beckstrom and Wolfe were unresponsive and suffering from gunshot wounds to the head. Beckstrom and Wolfe were immediately transported from the scene to a local hospital where they were admitted in critical condition.

On Thursday, November 27, 2025, all lifesaving efforts failed and Beckstrom was pronounced dead at 1758 hours by hospital staff. Beckstrom's remains were transported to the Office of the Chief Medical Examiner for the District of Columbia ("DC OCME") pending an autopsy.

On Friday, November 28, 2025, Dr. Kristinza Giese of the DC OCME performed an autopsy on Beckstrom's remains. At the conclusion of the autopsy Dr. Giese advised that Beckstrom was shot one time to the back of the head. Dr. Giese ruled the cause of death to be from a gunshot wound to the head, and the manner of death was ruled a homicide.

LAKANWAL was detained on scene by members of the United States Secret Service. LAKANWAL was transported to the hospital, where he underwent treatment for his injuries. LAKANWAL was identified at the hospital through fingerprint analysis as RAHMANULLAH LAKANWAL, with a date of birth of February 9, 1996, and with an address located in Bellingham, Washington.

Video was recovered from a number of locations near the crime scene. On one video, LAKANWAL can be observed standing on the sidewalk of I Street outside the Farragut West Metro station for about a minute. LAKANWAL appeared to be glancing westbound toward the intersection with 17th Street. LAKANWAL then began running in the direction of the intersection.

On another video, LAKANWAL was captured coming around the corner at the intersection with his hands raised in a firing stance. LAKANWAL immediately began firing in the direction of Beckstrom and Wolfe, and they are both captured on video collapsing on the ground. Additionally, LAKANWAL was observed chasing and shooting at NG M-1.

Your affiant therefore asserts that LAKANWAL, purposely and with deliberate and premeditated malice, killed Beckstrom by shooting her in the head with a firearm. Your affiant also asserts that, by shooting Wolfe in the head with a firearm, LAKANWAL assaulted Wolfe with intent to kill him.

THE .357 SMITH & WESSON REVOLVER

The weapon that LAKANWAL used to shoot Beckstrom and Wolfe was a .357 Smith & Wesson revolver, which was recovered from the scene, as shown below. The .357 Smith & Wesson revolver has the capacity to hold five rounds in the cylinder. The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) performed a trace of the weapon and determined that it had been lawfully purchased on February 24, 2007, in Bellevue, Washington by J.D. who passed away in Seattle, Washington in February 2023.



Your affiant is familiar with the firearms laws in Washington State. To purchase a handgun in Washington State, the purchaser must be at least 21 years old and must have a valid Washington State driver's license or state ID with a current address. Purchasers must have completed a recognized firearms safety training program within the past five years. All sales—including private transfers—must be conducted through a Federal Firearms Licensee (FFL), which requires the purchaser to complete ATF Form 4473 and to undergo a state background check.

On or about October 15, 2025, LAKANWAL sent an electronic message to an individual (hereinafter W-1), asking W-1 to "find this stuff for me." W-1 told investigators that LAKANWAL sent W-1 photographs of an AR-15, a "Draco", and a pistol. Your affiant is aware that the term "Draco" is commonly used to describe a compact, AK-47-style, stockless pistol (an example photograph of a "Draco" firearm can be seen below). Your affiant is also aware that both AR-15 rifles and Dracos are typically equipped with magazines that hold thirty rounds of ammunition. Your affiant is also aware that it is common for semiautomatic pistols to be equipped with magazines capable of holding at least ten rounds.



LAKANWAL further added "I'm doing [Lyft] an[d] Uber so I will need one of them[.]". W-1 responded "I wish I could help brother but the laws here are to[o] strict[.]"

Your affiant is aware that information received from Lyft shows LAKANWAL's last ride as a driver was on May 25, 2025. According to an interview with a family member in November 2025, LAKANWAL's account had been banned by Uber. According to an interview with another family member in November 2025, LAKANWAL had not been employed for approximately two months prior to the shooting.

On at least two occasions between October 15 and November 13, 2025, LAKANWAL approached W-1 to ask W-1 again about acquiring a firearm. On November 14, 2025, W-1 sent an electronic message to LAKANWAL stating that W-1 had "got off work late and would be there around 6pm[.]". On the same date, LAKANWAL sent W-1 a Google Maps link to LAKANWAL's home address in Bellingham, Washington.

The FBI obtained surveillance video from LAKANWAL's home in Bellingham, Washington. That video captured LAKANWAL exiting his home at 6:17 pm on November 14, 2025, and showed him greeting W-1. For the next two minutes, LAKANWAL and W-1 huddled around the open door of the vehicle driven by W-1. Thereafter, LAKANWAL returned to his home and W-1 drove away.

W-1 told investigators that he provided LAKANWAL with the .357 Smith & Wesson revolver that had been stolen from J.D.'s home in Seattle, Washington in May 2023. W-1 explained that he gave the firearm to LAKANWAL because he believed LAKANWAL wanted it for personal protection while working as a rideshare driver. W-1 stated that W-1 was extremely nervous during the exchange and was visibly shaking. According to W-1, LAKANWAL observed W-1's nervousness and placed an arm around W-1 in an effort to calm him. W-1 stated that it is common knowledge among his peers that firearms acquired "on the streets" are typically stolen firearms.

Your affiant asserts that the circumstances under which LAKANWAL acquired the .357 Smith & Wesson gave him reasonable cause to believe it was stolen.

W-1 also stated that the .357 Smith & Wesson revolver was fully loaded with five rounds in the cylinder when he provided the firearm to LAKANWAL. According to W-1, during the exchange, LAKANWAL remarked with words to the effect of “only five rounds?” W-1 also stated that he believed that LAKANWAL’s request for an AR-15 or “Draco” was inconsistent with his stated purpose of wanting a firearm for protection in his vehicle as a Lyft and Uber driver, as those firearms are large and difficult to conceal.

The day after obtaining the firearm from W-1, on November 15, 2025, LAKANWAL purchased a box of additional .357 caliber ammunition from Big 5 Sporting Goods in Bellingham, Washington, which was captured on CCTV footage. A purchase receipt for the ammunition is shown below.



Additionally, legal process reveals that on November 15, 2025, approximately two hours after he purchased the ammunition, LAKANWAL searched “Washington, D.C.” in Google Maps. The next day, LAKANWAL searched “The White House, 1600 Pennsylvania Ave NW, Washington, DC 20500” in Google Maps. Of note, the shooting committed by LAKANWAL on November 26, 2025, occurred in Washington, D.C., approximately two blocks from the White House.

TRANSPORTATION OF THE FIREARM TO WASHINGTON, D.C.

A query of Seattle Department of Motor Vehicle records identified LAKANWAL as the registered owner of a Toyota Prius, with a specific Washington State license plate, that was titled on November 13, 2025.

A review of license plate reader data that is made available to law enforcement through Customs and Border Protection indicates that the vehicle was located in Washington State on November 16, 2025. On November 19, 2025, the vehicle was located in Idaho. On November 21, 2025, the vehicle was located in Illinois. On November 23, 2025, the vehicle was located at 12th Street and Constitution Avenue, N.W., Washington, D.C.

Through different lawful means, the FBI attributed a mobile phone number to LAKANWAL. The FBI lawfully obtained location history data from that phone number. On November 22, 2025, the location history data placed the phone in the proximity to a tower in Mishawaka, Indiana, and later to a tower in Washington D.C.

Your affiant therefore asserts that LAKANWAL travelled from Washington State to the District of Columbia via the vehicle between November 16, 2025, and November 22, 2025, with the intent to commit a crime punishable by a term of imprisonment exceeding one year and while in possession of a firearm LAKANWAL had reasonable cause to believe was stolen.

Conclusion

For all of the reasons stated above, there is probable cause that, RAHMANULLAH LAKANWAL committed violations of 18 U.S.C. §§ 922(i), 924(b); 22 D.C. Code §§ 2101, 401, 4502, & 4504(b).

I declare under penalty of perjury that the information provided above in this affidavit is true and correct to the best of my knowledge.

Respectfully submitted,


AHMAD HASSANPOOR
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me on December 23, 2025.

G. MICHAEL HARVEY
UNITED STATES MAGISTRATE JUDGE