

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.** 1:24mj04432 Goodman

**UNITED STATES OF AMERICA**

**vs.**

**HARUN ABDUL-MALIK YENER,**

**Defendant**

**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: /s/Michael E. Thakur  
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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

v.

Harun Abdul-Malik Yener,

Case No. 1:24mj04432 Goodman

Defendant.

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

On or about the date(s) of November 20, 2024 in the county of Miami-Dade in the Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 844(i)

Attempt to damage or destroy a building, used in interstate commerce, by means of an explosive

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Handwritten signature of Garrett Y. Bowman

Complainant's signature

Garrett Y. Bowman, Special Agent FBI

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time

Date: 11/20/24

Handwritten signature of Jonathan Goodman

Judge's signature

City and state: Miami, Florida

Honorable Jonathan Goodman, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

1. Your affiant, Garrett Y. Bowman, is a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Miami Field Office. In my duties as a Special Agent, I investigate terrorism violations and other violent crimes. As a Special Agent, I am authorized by law and/or by the FBI to engage in or supervise the prevention, detention, investigation, and prosecution of violations of Federal criminal laws.

2. I make this statement in support of a criminal complaint charging Harun Abdul-Malik Yener (“YENER”) with attempting to use an improvised explosive device to damage or destroy a building used in interstate or foreign commerce, in violation of Title 18, United States Code, Section 844(i). Specifically, I submit, as summarized below, that there is probable cause to believe YENER took substantial steps in the Southern District of Florida to construct and deploy an improvised explosive device outside of the New York Stock Exchange (“NYSE”), a building used in interstate commerce.<sup>1</sup>

3. The facts in the affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and does not set forth all of my knowledge about this matter.

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<sup>1</sup> The NYSE building is located at 11 Wall Street in New York City, New York. The NYSE is owned by Intercontinental Exchange and is the largest stock exchange in the world by market capitalization. More than 50 percent of Americans own or trade stocks that are traded on the NYSE. The NYSE provides continuous trades during business hours. While some trades take place electronically, the exchange continues to have active trading activity on the floor and remains a property used in interstate commerce. *See* 18 U.S.C. § 10.

**SUMMARY OF PROBABLE CAUSE**

4. In February 2024, the FBI began investigating YENER, a South Florida resident born in the United States in 1994, after receiving a tip that YENER was storing bombmaking schematics in an unlocked storage unit in Coral Springs, Florida. After obtaining YENER's consent to search and a subsequent search warrant, FBI special agents found bombmaking sketches, numerous watches with timers, electronic circuit boards, and other electronics in YENER's storage unit that could be used for constructing explosive devices. From search warrant returns on YENER's Google accounts, agents discovered his repeated internet searches for aspects of bombmaking since as early as 2017. During an interview on March 1, 2024, YENER told law enforcement he had experience building "rockets" and "bombs," and that he had previously attempted to join domestic extremist groups. In June 2024, YENER disclosed to an FBI confidential source ("CS") his desire to join an anti-government militia and to construct an improvised explosive device.

5. After meeting an FBI undercover employee, whom YENER believed to be part of a militia, YENER identified the New York Stock Exchange as the location for deploying and detonating the improvised explosive device and his target date for carrying out the bombing was the week of November 18, 2024. His stated motivation for bombing the NYSE was to attain a "reboot" and/or "reset" of the United States government. In October and November 2024, in a law enforcement-controlled secure location that he believed to be controlled by the militia, YENER re-wired two-way radios to function as a remote trigger for the explosive device. YENER tasked FBI undercover employees with procuring the explosive element for the device, conducting surveillance of the NYSE, and obtaining photos of the building to identify the precise location for detonating the explosive device. YENER planned on wearing a disguise when planting the

explosive device outside the NYSE and recorded a message to be delivered to the press about his reasons for the attack. YENER anticipated the impact of the explosion would be “like a small nuke went off” and that “[a]nything outside” the building “will be wiped out” and “anything inside there would be killed.”

### **BOMBMAKING DRAWINGS AND MATERIAL IN YENER’S STORAGE UNIT**

6. On March 1, 2024, law enforcement agents located YENER and conducted an interview. YENER provided interviewing agents with written and oral consent to search his storage unit at a rental storage facility in Coral Springs, Florida. YENER, who is unhoused, used the storage unit to store his belongings that he did not maintain at his bed-down location.

7. Spiral bound notebooks found in YENER’s storage unit contained numerous drawings and diagrams of various landmines, explosives, missiles, and other improvised explosive devices.<sup>2</sup> When questioned about one such drawing, YENER told interviewing agents the drawing was of a “bouncing betty-style landmine,” which YENER said was a landmine that, when tripped, expels its explosive charge into the air so the charge detonates above ground level for maximum effect.

8. YENER admitted to interviewing agents to creating what YENER described as “rockets” that utilized precise chemical mixtures to launch. YENER explained how the chemical mixtures were very “volatile” and would explode if mixed incorrectly.

9. Some of YENER’s spiral notebooks also contained handwritten letters which included statements about “preparing for combat,” “a successful war,” “action is key to defeating

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<sup>2</sup> According to an FBI Special Agent/Bomb Tech who assisted with the search, some of these were not schematics of actual explosive devices, and appeared, in some instances, to be consistent with doodling. In other instances, however, YENER’s sketches demonstrated his familiarity with concepts of what the devices, specifically those with a military application, would look like.

our enemies and their allies,” “day for battle is coming this Spring,” “be prepared brothers,” and “self[-]sacrifice.” One of the writings begins: “Be prepared brothers. The day for battle is near, many of our enemies are arming themselves. Soon the United States and her allies will attack.”

10. During the March 1, 2024, interview with law enforcement agents, YENER claimed that in or around 2015, individuals who identified themselves as members of ISIS reached out to him through Facebook Messenger and attempted to recruit YENER to join and fight for ISIS overseas.<sup>3</sup> YENER told agents he considered joining and fighting for ISIS in Iraq in 2015, after the unnamed and unidentified individual who identified as a member of ISIS offered to help YENER travel from the United States of America to Iraq. YENER said he decided not to join ISIS in 2015 because YENER believed ISIS would not ultimately succeed in achieving their objectives.

11. At the conclusion of the March 1, 2024, interview, YENER told the interviewing agents he is currently waiting for his opportunity to act within the United States of America: “I am just waiting for some kind of hole to open up and I can go, ah, there it is—I’ll know it when I see

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<sup>3</sup> On or about October 15, 2004, the U.S. Secretary of State (“Secretary”) 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 (“SDGT”) 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 of the INA and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (*i.e.* “ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

it.” After law enforcement agents seized two cellular telephones found in YENER’s possession, YENER told law enforcement agents that he “made his choice and side.” YENER also told the interviewing agent the next time one of the unnamed and unidentified individuals contacted him, he “would help them with this or that.” Upon seizing the two cellular telephones found in YENER’s possession to prevent spoliation, the FBI obtained and executed a search warrant for both cellular phones on March 5, 2024.

12. On March 5, 2024, the FBI executed a search warrant on the storage unit belonging to YENER and found numerous electronic watches with alarm and timer features, approximately ten sets of Bluetooth wireless headphones, and various electronic circuit board components. According to an FBI Certified Bomb Tech Special Agent the aforementioned electronic devices could be used in the construction of an improvised explosive device.

#### **YENER’S PRIOR THREATS OF ATTACK**

13. After the FBI received information from Coconut Creek Police suggesting YENER was previously employed at a restaurant in Coconut Creek, Florida, law enforcement officers interviewed YENER’s former supervisor at that restaurant, where YENER worked in 2023.

14. According to his former supervisor, YENER was fired in July 2023, after YENER threatened to bring guns to the restaurant and target his co-workers based on YENER’s belief that those co-workers had stolen YENER’s money. YENER told his co-workers, “I’m about to go Parkland shooter in this place.”

15. Upon being notified of his termination, YENER’s violent behavior escalated and YENER began punching a wall, bloodying and bruising his knuckles. YENER then said that he “feels the way the Parkland shooter feels.” YENER made a motion as if he was shooting a rifle and made shooting sounds when discussing his desire to commit a school shooting. YENER said

that he had guns back in Oklahoma but was not able to bring his guns with him to South Florida. Thereafter, his former supervisor notified the Coconut Creek Police Department of YENER's threatening statements and behavior and requested their assistance with removing YENER from the restaurant's premises.

16. When Coconut Creek Police Department arrived on the scene, YENER told the responding police officers he wanted to "hurt and kill people like the Parkland shooter did."

### **INTERNET POSTS AND SEARCHES REGARDING EXPLOSIVE DEVICES**

17. On or about March 18, 2024, the FBI identified two YouTube Channels associated with YENER. On one of his accounts, YENER shared at least ten YouTube videos detailing how to construct explosives and fireworks from household items and also shared multiple videos about how to make triggers associated with traps and explosives.

18. Results from federal search warrants on multiple Google Gmail Accounts known to be associated with YENER show that from at least as early as 2017 through 2024, YENER has been researching how to construct explosive devices. In January 2017, for instance, there were two searches on YENER's account on YouTube for "suicide bomber," and six searches for "alarm clock time bombs." On June 19, 2017, there were five searches on YENER's account for "how to make a bomb." On November 19, 2023, two searches were conducted on YENER's account for "DIY Grenades", and on November 21, 2023, YENER's account showed that the video "How HAMAS RPG Works | Al-Yassin" was watched. More recently, on September 17, 2024, YENER's YouTube account included the following search and viewing history:

- cellphone detonator
- Phone call based Detonator || Triggering relay from phone call | control bomb from phone call Atwa ElectroniX



- Remote detonator (searched three times)
- How to make an electric detonator(igniter) for firecrackers and rockets
- DIY remote detonator Epic Universe
- Remote BFG Detonator DIY quick build Hadron AirsoÕ Designs
- Remote detonator from rc car (searched ten times)
- Remote Control Bomb #RC#BOMB CreaØve Mehdi
- Making a Remote control Bomb Exploser | Life hacks #short InvenØon123
- Improvised explosive device (IED) homemade bomb Pancho Shelby

#### **YENER’S COMMUNICATIONS WITH CONFIDENTIAL SOURCE**

19. On or about June 27, 2024, at the FBI’s direction, an FBI CS established electronic communication with YENER via an instant messaging application.

20. During an unrecorded phone call with the CS on June 29, 2024, YENER told the CS YENER was a member of a small group who, in the past, attempted to join the Boogaloo Boys and Proud Boys.<sup>4</sup> According to YENER, he, along with the other members of YENER’s group,

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<sup>4</sup> Some domestic violent extremists (“DVEs”) use the “boogaloo” concept to reference a violent uprising or impending civil war. The concept has resonated with militia violent extremists, who have adopted it to reference and impending politically-motivated civil war or uprising against the government following perceived incursions on Constitutional rights – including the Second Amendment – or other perceived government overreach. Some racially or ethnically-motivated violent extremists (“RMVEs”) have used the term to reference and impending race war – or other conflict that will lead to the collapse of the “system,” including the U.S. government, society, etc. DVE’s may allude to the boogaloo concept by using shorthand terms such as “big igloo” or “big luau” and imagery such as igloos or Hawaiian shirts. The boogaloo is not a single cohesive group, rather a loose concept arising from internet platforms which has become a rallying point for some violent extremists.

The Proud Boys are a self-described “Western Chauvinist” fraternal organization, some of whose members have committed violence against perceived adversaries at First Amendment-protected events in the United States. The Proud Boys are a national organization with many, largely

were ultimately turned down by both the Boogaloo Boys and Proud Boys because YENER expressed a desire to pursue martyrdom, which led both the Boogaloo Boys and Proud Boys to deem YENER unsuitable.

21. During a recorded call on July 3, 2024, YENER told the CS he has most of the equipment needed to construct an explosive device and knows how to construct an explosive device. YENER encouraged the CS to search for videos on bombmaking tasks that, when completed collectively, would result in the creation of an explosive device. More specifically, YENER suggested videos about how to solder, how to create tripwires, and how to build and set up remote control devices, which together could teach skills needed to construct an improvised explosive device.

22. In a recorded phone call between YENER and the CS on July 4, 2024, YENER discussed bombing public infrastructure. YENER discussed how bombing a powerplant would greatly inconvenience local government and the community. YENER discussed that if one was interested in creating casualties, they might target a Walmart instead of a powerplant. YENER told the CS if one wanted to minimize civilian casualties, they could target the Walmart at night when the store is less crowded.

23. In a recorded phone call between YENER and the CS on July 8, 2024, YENER disclosed to the CS his concerns about storing his bomb-making equipment because of the FBI's prior search of his storage unit. YENER also told the CS that, since the FBI seized his notebooks which contained diagrams for certain explosive devices he planned to build, YENER needed to

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autonomous U.S. chapters and some activity in other Western Countries. The group has an initiation process for new members, who often wear yellow and black polo shirts or other apparel adorned with the Proud Boys logo to events.

recreate those diagrams and conduct additional research online about bomb-making. YENER also discussed plans to build a remote-control trigger device that could be attached to an explosive element to create an improvised explosive device, which YENER said would be used for “close contact kills.”

24. In a recorded phone call between YENER and the CS on July 22, 2024, YENER told the CS he had the material needed to make a bomb, stating: “I’ve never bought one, I don’t need to, I can make one if I want to . . .” “[T]he point is I just have it stored away so that if I ever need it for some judgement day . . . [] I’ve got it.”

25. During the July 22, 2024, phone call, YENER also discussed other potential targets, including local retailers, stadiums, and schools. For instance, YENER discussed a hypothetical individual wearing a suicide vest inside a Walmart on Black Friday, inside a crowded football stadium during a football game, or in a school auditorium during a children’s Christmas play. YENER told the CS any of the aforementioned targets would be good targets because they would all be full of densely packed crowds of people, which would ensure maximum casualties. While YENER posed the aforementioned targets to the CS hypothetically, based on my training and experience, it is common for individuals plotting violent attacks to articulate their own premeditated targets as potential targets of a hypothetical person.

26. During a recorded phone call between YENER and the CS on July 14, 2024, YENER told the CS he visited a local mall to find a drone suitable to carry a remotely detachable explosive, such as a grenade, but that none of the drones sold by retailers were large enough to support an explosive device.

27. On August 8, 2024, during an in-person recorded meeting with the CS, YENER discussed needing to be prepared for civil unrest this fall in the aftermath of the upcoming

Presidential election. When questioned by the CS about what YENER was doing to prepare, YENER stated he was gathering supplies to build an explosive device. YENER again told the CS he had all the bomb-making parts he needed with the exception of a dependable receiver and detonator.

28. During a recorded phone call which took place on August 12, 2024, YENER discussed potentially creating a “Bouncing Betty” landmine.<sup>5</sup> YENER told the CS the “Bouncing Betty, “would include BB’s, glass, barbed wire, and certain maiming chemicals within the explosive charge.”

**YENER’S CONVERSATIONS WITH UNDERCOVER EMPLOYEES:**

**Meeting on September 26, 2024, Between YENER and FBI UCE-1 and FBI CS**

29. On September 26, 2024, YENER met with an Undercover Employee (“UCE-1”) of the FBI.

~~30.~~ During that meeting, which was recorded, YENER told UCE-1 he wanted to join a militia because “We need a reboot.” Your affiant assesses YENER was referring to the United States Government when he used the word “we.” YENER added: “This country is due for a revolution.”

31. During the meeting with UCE-1, YENER expressed his willingness and desire to build and provide an improvised explosive device for the aforementioned militia which YENER knew would be used against a target in the United States: “Hear me out, even if [the militia] didn’t accept me, if [the militia] were still to hit me up for...like a thing, I would still do it, because the point is the cause.” YENER later told UCE-1: “I’m down, I’m down. I’ll build it, whatever, just

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<sup>5</sup> The “Bouncing betty” landmine is of the same type as the landmine sketched by YENER and discussed in paragraph 17.

need a spot, but I'm down...One hundred percent...I'm ready for my, don't take this serious, please don't be alerted when I say this, I'm ready for my Jihad." By "just need a spot," your affiant assesses YENER was telling UCE-1 he needed a location where YENER could construct and store an improvised explosive device.

32. During the same meeting with UCE-1, YENER went on to tell UCE-1 he taught himself how to build improvised explosive devices and he also learned from relatives who had experience constructing improvised explosive devices. YENER also told UCE-1 that, in the past, he acquired blueprints for improvised explosive devices from the internet and from various, unnamed foreign terrorist organizations and built improvised explosive devices, which he tested in more rural areas. In a later meeting with UCE-1, YENER described testing remotely-detonated improvised explosive devices YENER constructed

33. During the same meeting with UCE-1, YENER identified several potential targets against which YENER could deploy an improvised explosive device. YENER's potential targets included political leaders, a power grid, or government facilities.

34. Before leaving the meeting with UCE-1, YENER promised to research potential targets where he might detonate his improvised explosive device, stating: "When we meet again, I will have, literally, [a] list; not an actual—I'm not a dummy to write it down—but a list in my brain."

35. Following the meeting with UCE-1, YENER began to store bombmaking material in the aforementioned secure location that UCE-1 told YENER belonged to the militia, but which, unbeknownst to YENER, was actually controlled by law enforcement. As described below, on October 30, 2024, YENER began to construct and test an improvised explosive device in the secure facility controlled by law enforcement.

**Meeting on October 3, 2024, with FBI UCE-1**

36. On October 3, 2024, YENER requested UCE-1 drive him to a local Walmart where YENER could purchase a few items and tools needed to construct an improvised explosive device. After showing YENER the aforementioned secure location, UCE-1 drove YENER to a Walmart store, where YENER purchased the following items:

- A soldering iron
- A soldering kit
- A Multimeter voltage reader
- A Micro-Screwdriver Kit

After purchasing the aforementioned items at Walmart, UCE-1 and YENER traveled back to the secure location where YENER willingly left the items purchased at Walmart behind.

37. During the meeting, YENER discussed various methods of constructing a remotely detonated device: “With a remote, there are multiple ways I can make a remote to trigger a detonator. I’ve used a doorbell. I’d like to use a two-way radio, because then you can detonate it from two miles away.” YENER told the UCE he wanted to use a two-way radio to detonate his improvised explosive device, because it would be harder for law enforcement to intercept or trace the two-way radio signal.

38. By the end of the meeting, after mentioning several potential targets, YENER told UCE-1 he had settled on the New York Stock Exchange as the location where YENER plans to detonate the improvised explosive device, explaining: “There is one place that would be hella easy...the stock exchange, that would be a great hit. Tons of people would support it. They would see it and think dude, this guy makes sense, they are [profanity] robbing us. So that’s perfect.”

39. YENER also described preliminary research he had completed on targeting the

NYSE: "I've already seen it, I know the layout of it, there is barely any security." YENER told UCE-1 he would "look up some surveillance" and "do more research...on the stock exchange and really look into it" to identify the best position to place and disguise the explosive to ensure maximum effect and to avoid detection by law enforcement before YENER detonated the device.

40. YENER explained to UCE-1 that it was best to target a location outside the state of Florida to avoid law enforcement detection: "That's why I was talking about somewhere like New York or DC, because I feel like if you hit there, it will throw them off a bit... because most attackers are going to be in the city they attack, like the Boston marathon bomber, the 9/11 attackers, even Timothy McVeigh, yeah Oklahoma City...if you do that, it's going to make them think, obviously they are somewhere down here." By "them" your affiant assesses YENER was referring to law enforcement.

41. YENER expressed his willingness to travel to New York to assist in carrying out the attack on the NYSE. YENER stated: "I'd even take a trip up there to like, set it up, New York."

42. YENER also suggested the militia craft an audio statement in anticipation of bombing the NYSE. YENER explained the aforementioned audio statement would explain the militia's motivation and objectives to the American public. YENER compared such a statement to equivalent videos made by groups like the Taliban. YENER went on to explain the militia would need to be careful in how they construct the statement, in order not to inadvertently reveal their location and lead to their arrest. YENER told UCE-1 he was willing to write the script for the audio statement.

43. YENER also acknowledged that some of the items seized from his storage unit by the FBI were intended to be used to make explosives: "I understand why they took my stopwatches though, because I was going to be on some [profanity] with those things if I am going to be honest,

but I didn't tell them that. I still had the damn watches in the boxes, never opened and that made them paranoid because they were going to be used for bombs.”

**Phone Call on October 7, 2024, with UCE-1**

44. On October 7, 2024, YENER told UCE-1 during a call that he had conducted research on how to use two-way radios to construct a remote-trigger detonation device: “I’ve already looked up the anatomy of walkie-talkies and everything. So, I know where to connect everything.”

45. During the same phone call, YENER told UCE-1 he planned to purchase a “little light bulb,” so that: “when I am done putting everything together, I can use the light bulb to test...to see if it works []. . .” “Instead of, like, actual charges.” YENER described how the light bulb would reveal if the improvised explosive device would work, stating: “Connect the little light bulb to it and then when it’s done, push the trigger remote and if it pops on, you are going somewhere.” YENER also discussed needing to ensure the improvised explosive’s trigger-device delivered the right amount of power to the explosive element once created. YENER told UCE-1 this is why YENER purchased the multimeter at Walmart on October 3, 2024. YENER explained the multimeter would allow him to test the voltage being sent from the remote-detonating trigger device to the explosive element. Finally, YENER told the UCE that, in addition to the aforementioned two-way radios, YENER needed some “wires,” stating: “once we get the wires and the talkies, [] ...it’s a go.”

46. Following the phone call, YENER sent UCE-1 a message via an encrypted messaging application containing a hyperlink to the exact model two-way radio YENER planned to use in his improvised explosive device. At YENER’s direction, UCE-1 purchased the two-way radio YENER requested and provided it to YENER in a subsequent meeting discussed below.



After receiving the two-way radios from UCE-1, YENER stored the two-way radios in the secure location controlled by law enforcement.

**Phone call on October 10, 2024, with FBI CS**

47. On October 10, 2024, during a call with the CS, YENER discussed how the surveillance and security present at the NYSE would make planting an explosive risky, and they needed to accept it was a “one-way ticket.” Your affiant assesses that by “one-way ticket” YENER meant he knows it is likely that if he detonates an improvised explosive device outside the NYSE, he is likely to be caught by law enforcement or maybe even die, and YENER finds those potential outcomes acceptable.

**Meeting on October 23, 2024, with Multiple FBI UCEs**

48. On October 23, 2024, there was a consensually monitored meeting between YENER and multiple UCEs in the vicinity of Sunrise, Florida. In anticipation of the October 23, 2024 meeting, UCE-1 explained to YENER that leaders of various like-minded groups would be gathering to discuss each group’s objectives and upcoming plots, so that the groups could coordinate their actions for maximum effect.

49. At the meeting, YENER presented his plan to build and detonate an improvised explosive device outside the NYSE the week before Thanksgiving 2024. In describing his plan, YENER sketched for multiple UCEs the layout of the explosive device’s electrical components<sup>6</sup> and talked through how he would re-wire two-way radios to power a circuit that would detonate a blasting cap located in an explosive element.

50. YENER also told the UCEs that he believes detonating an improvised explosive

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<sup>6</sup> Upon the conclusion of the October 23, 2024 meeting, the UCE gave the sketch of the improvised explosive device to the FBI who entered the sketch into evidence at the Miami FBI Field Office.

device will lead to a “reboot” and/or “reset” of the United States government: “The Stock Exchange, we want to hit that, because it will wake people up.”

51. YENER also repeatedly referenced the idea of making a statement that would be sent to a news station following the bombing of the NYSE. YENER told the UCEs the statement would not claim credit for the attack, but would explain his motivation and objectives. YENER also told the UCEs they should stamp the envelope the statement would be delivered in with a predetermined symbol or signature that would also be used during future attacks. YENER believed using such a symbol or signature would allow people to connect subsequent attacks to the bombing of the NYSE and recognize the same group was behind future attacks.

52. YENER also discussed what type of explosive element YENER planned to use in his improvised explosive device. UCE-2 explained to YENER that UCE-2 had access to virtually any commercial grade explosive. YENER told UCE-2 he had been considering using a mixture of household chemicals, because YENER did not think getting access to commercial grade explosives was possible. Upon learning that he could access commercial grade explosives to use in his improvised explosive device, YENER told UCE-1 and UCE-2 he would think about what explosive would be best.

53. YENER also described the anticipated destructive impact of his improvised explosive device: “So, I want it to be powerful enough to, of course, blow the [profanity] doors off and blow anything up in there, like, big enough...to blow up anything existing in there will be killed.” On November 4, 2024, YENER told UCE-1: “...it’ll be like a small nuke went off.” “Anything outside” the building “will be wiped out...anything inside there would be killed.”

54. YENER tasked UCE-3 with conducting site-surveillance of the exterior and interior of the NYSE: “So, I need to know, what, specifically, if there are any plants, mailboxes,

or anything close to the building that can be used to help camouflage it.” By “it,” your affiant assesses YENER was referring to explosive device. YENER also requested photos and videos of the perimeter of the NYSE. Finally, YENER requested photographs, videos, and any information about security at the NYSE, stating: “Honestly, the biggest thing, for sure to know, is how bad is their security, because if that [profanity] is thick like Fort Knox...we’re still going to do it, but we need to be more elaborate in how we hit them...”

55. YENER acknowledged the casualties that would occur from bombing the NYSE: “it’s not really like, mostly for casualties, like again, if people get killed, they get killed, I don’t care.” “We’re trying to make an explosion where, yeah, if it kills people, it kills people, it’s a bomb, but at the same time it’s, it’s mostly there to mostly get attention. That’s why I said, if we can help not killing people in the process, oh well, if we can’t, oh well.”

56. Throughout the meeting, YENER expressed his willingness to travel to New York, place the explosive device outside of the NYSE, and then detonate it: “I’ll go up there...and do it if need be...I don’t care... it’s like I told him, I have nothing to lose, like, I got no wife, kids, you know what I mean...” “[I]f I’m the one plotting it, who better to know where to put it.” You affiant assess that by “it” YENER is referring to the improvised explosive device YENER plans to construct.

57. YENER also discussed various ways he could disguise himself to fit into the area surrounding the NYSE, including dressing up like a florist, a mailman, a FedEx Driver, or as a business person in a suit.<sup>7</sup>

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<sup>7</sup> Following the meeting, YENER and UCE-1 had three consensually monitored meetings during which YENER traveled to the militia’s secure location and worked on his improvised explosive device. These consensually monitored meetings took place on October 30, 2024, November 4, 2024, and November 7, 2024.

**Meeting on October 30, 2024, with UCE-1**

58. On October 30, 2024, YENER requested UCE-1 stop at Home Depot so that YENER could purchase wire and a light bulb. YENER told UCE-1 he needed the wire to create the improvised explosive device and the light bulb to test its efficacy. Upon arriving at the law enforcement-controlled secure location that day, YENER spent several hours deconstructing the two-way radios he requested and soldered new wires and electrical components to one of the deconstructed two-way radios. YENER was utilizing the soldering iron and electrical equipment purchased at Walmart on October 3, 2024.

59. YENER discussed his purpose in attacking the NYSE and where the aforementioned statement should be sent following the attack. YENER told UCE-1: “I chose that target specifically because it not only has sentimental value, but it will hurt the U.S., at least delay them on their sales of arms to foreign countries.” YENER told UCE-1 he would send the statement to “NBC.”

60. YENER reviewed photographs and videos of the exterior of the NYSE, noting the security cameras depicted in the photographs, as well as a police booth located near an entrance to the NYSE. Upon seeing a photograph of a FedEx delivery driver, YENER commented, “I wouldn’t use a box, but his disguise would work.” Your affiant assesses YENER was referring to possibly using a FedEx uniform as a disguise in his attack against the NYSE.

**Message to UCE-1 from YENER on October 31, 2024**

61. YENER sent UCE-1 messages on Facebook Messenger on October 31, 2024 indicating that he needed a box which would store and conceal YENER’s improvised explosive device on the day of the attack. YENER also referenced needing to get with the “brothers” about “powders.” Your affiant assesses that by “brothers” YENER was referring to UCE-2, who YENER

believed had access to commercial grade explosives. By “powders,” your affiant accesses YENER was referring to the commercial grade explosives. In a later message, also sent on October 31, 2024, YENER referenced needing a “Map of NEW YORK” because “WE NEED TO GET ALL EXIT AND ENTRY WAYS DOWN + PLAN FOR MULTIPLE EXTRACTION PLANS (3 NAMELY, Working ON IT).”

**Meeting and Phone Call on November 4, 2024, with UCE-1**

62. During a consensually monitored meeting between YENER and UCE-1 on November 4, 2024, YENER successfully rewired the two-way radios into a remote-trigger device. To do this, YENER disassembled one two-way radio, rewired the disassembled two-way radio, and then connected the rewired two-way radio to a light bulb. When YENER pressed the talk button on the first two-way radio, the light bulb connected to the rewired two-way radio illuminated.<sup>8</sup> YENER then tested the range of the two-way radio signal by walking around the parking lot of the law enforcement-controlled secure location with one two-way radio to see how far away he could stand from the rewired two-way radio and still successfully illuminate the light bulb. Upon successfully creating the remote-trigger device, YENER used the multimeter purchased at Walmart on October 3, 2024 to test the strength of the electrical current being manufactured by the remote trigger device. YENER told UCE-1 he would need to add a transformer to the electrical circuit to “step-up” the voltage delivered by the remote-trigger device in order to detonate a blasting cap implanted in the explosive element attached to the improvised explosive device.

63. After successfully rewiring the two-way radios to create a remote-trigger device,

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<sup>8</sup> UCE-1 captured a video of YENER successfully testing his remote-trigger device on November 4, 2024.

UCE-1 and YENER called UCE-2 on November 4, 2024. YENER told UCE-2 of his success with rewiring the two-way radios, stating: “Everything, it, it works when we press the button, though. When we push the button, it does connect, it does, uh, turn on the light, it does activate...we’re ready for the trip, the mission.” Your affiant assesses that by “trip” and “mission” YENER was referring to YENER’s plot to travel to New York to plant and detonate an improvised explosive device outside the NYSE. During the call with UCE-2, YENER also requested: “a blast cap” and “some boom, some explosives.” YENER then clarified what type of explosive he was requesting from UCE-2, stating: “...for the bomb, uh, like, fertilizer.” UCE-2 communicated to UCE-1 and YENER that, per YENER’s request, UCE-2 would acquire a blasting cap and some fertilizer that UCE-2 would then supply to YENER for YENER’s improvised explosive device.

64. During the meeting, YENER told UCE-1 what disguise he thought they should wear when YENER placed the improvised explosive device outside of the NYSE: “We’re all going to need to wear gloves...and, oh, I do recommend we wear, I have one, like I saved it for this moment, I never even touched it, a beanie, so that you keep your hair follicles.” YENER also told UCE-1: “So, when I get in and go, I got rubber bands here, rubber bands there, wear a long jacket, rubber bands keep everything inside, hair covered, yeah, uh, because they’re going to be looking for that, I’m going to get some glasses, and just cover my eyes . . . []. I have a bandana and all of that, so that’s not a problem—a black one, too.” At a meeting with UCE-1 on November 7, 2024, YENER requested UCE-1 take YENER to YENER’s storage unit, where YENER retrieved the aforementioned black bandana and gave it to UCE-1 to store in the law enforcement-controlled secure location.

65. During the meeting, YENER also discussed the need for fleeing New York immediately after completing the attack. UCE-1 told YENER, referring to bombing the NYSE: “I

mean let's face it, we're going up there, there's a chance that we ain't making that trip back.” YENER replied: “Exactly, I considered that, too.” YENER then told UCE-1, “Honestly, bro . . . [] once it goes off, I kinda like, because I want it to go off around 2-2:30ish in the morning, but once—because if it happens in the morning bro, there, there's less cops in the morning. . . .” “[T]here's less resources, SWAT ain't going to be that available. So, if we hit them in the morning, we have, like I honestly want us to hit that,” “get in the car,” and “get the [profanity] out of there.” Upon exiting the vehicle, YENER told UCE-1 “The day for battle is coming, I'm sharpening my sword.”

#### **Meeting on November 7, 2024, with UCE-1**

66. On November 7, 2024, YENER spent several hours at the law enforcement-controlled secure location attempting to amplify the voltage generated by the remote-trigger device YENER had constructed on November 4, 2024. UCE-1 reminded YENER of the individual known by UCE-2 who could assist YENER with completing the improvised explosive device. YENER replied: “that was fine and they should go ahead and do that because this is taking too long.” YENER requested assistance from the aforementioned individual “because [the militia] has a tight schedule” and YENER “does not want to move back the date because this [profanity] has to go down by Thanksgiving and it will.” By this “has to go down,” your affiant assesses YENER was referring to his plan to detonate an improvised explosive device outside of the NYSE. YENER then told UCE-1 that YENER wanted to “start on another one,” referring to another improvised explosive device for future attacks against “oil rigs.”

#### **Yener's List of Demands Texted to UCE-1**

67. On November 8, 2024, YENER sent UCE-1 several text messages on Facebook

Messenger that included a draft list of demands that he appeared to want from the U.S. government after the planned NYSE attack: (1) mass deportation of “illegal immigrants and undocumented migrants” and the discontinuation of “funding and housing” for immigrants and migrants; (2) increased funding for various social programs, infrastructure, public housing, and programs intended to curb inflation; and (3) that the “U.S. gov” cease the sale of “arms” and funding to “foreign entities.”

#### **Meeting on November 12, 2024, with UCE-1**

68. On November 12, 2024, YENER made multiple audio recordings of the demand statement, which YENER discussed wanting to arrive at NBC News either the day of his bombing of the NYSE or the day after.

69. When UCE-1 gave YENER a microphone into which YENER would record his statement, YENER commented: “I feel like Bin Laden.”

70. YENER began the statement by stating: “What you’ve just witnessed at the Stock Exchange and California<sup>9</sup> was just the beginning of a new era. A new revolution.” YENER went on to state: “Our war is with the government” and encouraged others to join his cause, stating: “We ask and encourage others to follow suit in their pursuit for change.” By “government,” your affiant assesses YENER was referring to the United States Government. YENER then references the sale of “arms” to “foreign governments and entities” as a particular grievance, and then offerings a warning: “Be warned, if you raise your fist, we will cut them off. If you kick at us, we will break your legs. If you speak ill of us, we will chop out your tongue. If you aren’t willing to

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<sup>9</sup> During the October 23, 2024 consensually recorded meeting between YENER and the UCEs, YENER overheard the UCEs discuss a like-minded group on the West Coast of the United States have “a hell of an impact” with an event being planned that was supposed to occur around the same time frame as YENER’s proposed attack of the New York Stock Exchange.



stand, then you will fall a victim.” YENER then states: “Soon, we will commence our operations” and warns civilians: “this requires you to avoid all government buildings and facilities that will be marked as targets.” Finally, YENER proclaims: “There are no exceptions to our demands or terms. You will burn before and after your demise.”


71. Both before and after recording the aforementioned statement, YENER continued to discuss a potential second wave of attacks following YENER’s bombing of the NYSE.

72. On November 20, 2024, law enforcement arrested YENER.

**CONCLUSION:**

73. Based on the foregoing, I submit there is probable cause for a criminal complaint charging Harun Abdul-Malik YENER with violating Title 18, United States Code, Section 844(i) (attempted use of an explosive to damage or destroy any building used in interstate or foreign commerce).

**FURTHER AFFIANT SAYETH NAUGHT.**

  
GARRETT Y. BOWMAN  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1  
by Face Time this 20 day of November 2024

  
HONORABLE JONATHAN GOODMAN  
UNITED STATES MAGISTRATE JUDGE