

AFFIDAVIT OF SPECIAL AGENT PAUL LAGNO

I, Paul Lagno, 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 since January 2019. Among other things, I am responsible for conducting national security investigations of potential violations of federal criminal laws as a member of the Joint Terrorism Task Force (“JTTF”). During my tenure as an agent, I have participated in numerous criminal and national security investigations.

2. 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, and fraud. As a result of my training and experience, I am familiar with the tactics, methods, and techniques of terrorist networks and their members, including the use of computers, cell phones, social media, email, and the internet in connection with criminal activity. I have participated in the execution of numerous federal search warrants.

3. As a Special Agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

4. I submit this affidavit in support of a criminal complaint charging MATEO VENTURA (“VENTURA”) with a violation of 18 U.S.C. § 2339C (concealing financing of terrorism). As described below, between on or about January 25 and May 16, 2023, VENTURA concealed or disguised the nature, location, source, ownership, or control material support or resources in the form of monetary instruments (to wit: gift cards), with the intent that such material support was to be provided to the Islamic State of Iraq and al-Sham (“ISIS”).

5. This affidavit is based on statements made to me or to other law enforcement officers and witnesses by VENTURA and others; my review of records gathered during the investigation; information conveyed to me by other law enforcement agents involved in the investigation; and my own experience, training, and background as an FBI Special Agent. This affidavit does not detail all of the facts known to me or other law enforcement agents regarding this matter. Instead, this affidavit relates only to those facts that I believe are necessary to establish the requisite probable cause for issuance of the requested complaint and arrest warrant.

RELEVANT LEGAL AUTHORITY

6. Title 18, United States Code, Section 2339C(c) provides for criminal penalties for anyone who “Whoever... is in the United States... and... knowingly conceals or disguises the nature, location, source, ownership, or control of any material support or resources, or any funds or proceeds of such funds—(A) knowing or intending that the support or resources are to be provided, or knowing that the support or resources were provided, in violation of section 2339B of this title.”

7. Section 2339B prohibits a person from knowingly providing material support or resources to a foreign terrorist organization, or attempting or conspiring to do so.

8. For purposes of Section 2339C, “material support or resources” is defined as:

any property, tangible or intangible, or service, including currency, monetary instruments or financial services, lodging, training, expert advice or assistances, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself) and transportation, except medicine or religious materials

18 U.S.C. § 2339A(b)(1).

Background of ISIS

9. On October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act (“INA”) and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On May 15, 2014, the United States 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 (“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 listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

FACTS SUPPORTING PROBABLE CAUSE

Initial Communications Regarding ISIS

10. VENTURA is a resident of Wakefield, Massachusetts, in the District of Massachusetts. He resides at home with his father. During this investigation, I determined that VENTURA had online conversations with an FBI employee acting in an undercover capacity (“OCE”) about providing support to ISIS in the form of a monetary instrument, and his desire to travel abroad to join and fight with ISIS. VENTURA used an online encrypted messaging application for these communications. Based upon my training and experience, I am aware that the encrypted messaging application (“EMA”) used by VENTURA has become one of ISIS’s primary communication tools, and is used by its adherents and supporters. In addition, I am

aware that many of ISIS's supporters use this online messaging application to communicate their support for ISIS and to plan attacks.

11. In August 2021, VENTURA (utilizing an encrypted EMA account "EMA Account 1") began communicating online with the OCE about his desire to "make hijrah," which from my training and experience I know refers to traveling overseas to join and fight with ISIS.

12. On or about August 3, 2021, the OCE exchanged the following communications with VENTURA:¹

VENTURA: I reached out to brother [A.D.] for hijrah [migration] I dont know if it is still possible but if it is I know it will take sometime.

OCE: Ahh

OCE: Inshallah [if Allah wills it] I help u, but before talk have rule my brother.

OCE: U must no talk about what said here or intention to anyone. No tell family. No tell friend. No tell ikhwan [brothers] at masjid [mosque]. No one. This for both are safety.

OCE: Intention stay between U and Allah azzawajal [the mighty and majestic].

OCE: This is how many muhajir [migrant] get arrest by kuffar [disbelievers] security service. They talk too much. Understand?

VENTURA: Yea I know like I said I have saw mistakes of others

VENTURA: I understand brother.

OCE: Ok akhi khair [benevolent brother]. But also must be sure u no support murtad [apostate] or munafiq [false Muslim] group. I not help if so. What group u support akhi [brother]?

VENTURA: The khilafa [the Caliphate] brother

OCE: Many lion online say they support dawla [the State]. But only from behind keyboard no willing to make sacrifice.

VENTURA: Yea I know only a very brave brother would.

OCE: Okay akhi [brother] but this danger thing to talk of

¹ Set forth below in brackets are the English translation of certain Arabic words and phrases used in the context of the conversation, that I know based upon my training and experience.

OCE: Why u want make hijrah? U want emmigrate or want be mujahideen [Islamic fighters]?

VENTURA: Mujahideen² [fighter] Akhi [brother]

OCE: Alhamdulillah [praise be to God] may Allah azzawajal [the Majestic] grant you a path.

OCE: U are strong akhi [brother]? Healthy?

OCE: Life of a mujahideen [fighter] not easy.

VENTURA: Very strong healthy

OCE: Where u make hijrah from? U western brother?

VENTURA: Yes akhi [brother].

OCE: Have passport? no expired?

VENTURA: No I will work on passport.

OCE: I no understand that. What mean work on passport?

VENTURA:I don't have one yet but I will get one.

OCE: Ok akhi [brother] inshallah [if Allah wills it].

OCE: What wiliyat [province] u want hijrah [migration] to?

VENTURA: Is iraq possible still brother?

OCE: It not same as was years ago akhi [brother]. Dawla [the State] no hold land like before. Many route closed. Hijrah [migration] very dangerous now.

OCE: Sham [Levant; known locally as Syria] and iraq mostly closed.

VENTURA: What about eygpt [sic]?

OCE: Sinai? Na'am [yes] some route still open.

OCE: Still dangerous tho

OCE: Could be arrest or become shaheed [martyr]. If u have doubt this not path for you.

OCE: U understand?

² Mujahideen is actually plural and is translated as "fighters" and the singular Arabic word meaning a "fighter" is "mujahid" but the context is clear that VENTURA is speaking of himself so it is therefore translated herein in the singular form where applicable.

VENTURA: yes.

OCE: What benefit u give? Hijrah [migration] now difficult. Danger for smugglers only make risk for serious brothers.

OCE: How u benefit khilafah [the Caliphate]? U have skill?

VENTURA: Skill in weapons brother also I would carry out shaheed [martyr] operation if wanted.

OCE: U want be istishhad [martyrdom] operation?

VENTURA: Yes if wanted I would.

OCE: I not hear many ikhwa [brothers] from west say this. Why u want this akhi [brother]?

VENTURA: Inshallah [if Allah wills it] yes brother.

VENTURA: because if done right they can kill many kuffar [disbeliever] brother.

OCE: Alhamdulillah [praise be to God] may Allah break their backs.

OCE: U are born muslim? Or u are revert [convert to Islam]?

VENTURA: Revert lots of reverts in the west akhi [brother].

OCE: Where from west?

VENTURA: America

OCE: Ok akhi [brother] america very danger tho u must be careful.

OCE: Must no talk of intention

OCE: What ur age akhi [brother]?

VENTURA: 18 akhi [brother]³

OCE: How long take for passport?

VENTURA: a month of two

OCE: Able to pay for flight? Also need money for pay smugglers?

³ At this time, however, VENTURA was a minor. He turned eighteen in December 2022.

VENTURA: Yes have a stack of cash.

OCE: After get passport u want leave?

VENTURA: Yes

OCE: Have zawja [wife]? Family?

OCE: Only u go.

VENTURA: Only me yes family stay

OCE: U can speak arabic akhi [brother]? Very few american in sinai idk how many know english

VENTURA: No but in my spare time I could practice a lot if I spent all day akhi [brother] I could get basics very important

VENTURA: Well I could spend all day and learn fast

VENTURA: I have learnt languages very fast when needed.

13. As noted above, based on my training and experience, I understand “Dawla,” an Arabic word meaning “State” to be an alias for ISIS, and “Islamic Caliphate” to refer to a state governed under Islamic or Sharia law. The Caliphate is a term that has been used by ISIS to describe the territory that they had once controlled in Syria and Iraq, and ruled according to Islamic law. Additionally, I understand that the Arabic term “Shaheed” means martyr, “istishhad operation” means a martyrdom operation in which the attacker intends to lose his life, and “kuffar” means disbeliever.

14. On or about August 3, 2021, during the chats exchanged between the OCE and VENTURA, VENTURA explained he had not yet pledged his allegiance to the leader of ISIS. Pledging allegiance is a common way for ISIS supporters to demonstrate their commitment to the group. This is referred to as making “baya” or “bayat”, and typically this pledge is made before any martyrdom operations or acts that are taken on behalf of ISIS so that if the supporter is killed, he supposedly obtains all the rewards from Allah, or God, when he goes to heaven. On

August 3, 2021, the OCE sent VENTURA language for VENTURA to make his “bayat”, or pledge, to ISIS.

15. In response to the OCE’s instructions on how to make his pledge to ISIS, later on or about August 3, 2021, VENTURA asked the OCE whether he could “copy all [of the words] or just Arabic?” The OCE responded that it was “okay” for VENTURA to only use the “English” words “but [VENTURA] must say” it aloud. VENTURA advised the OCE that he would “send” his bayat:

VENTURA: send

OCE: U record then and I give [to] sinai ikhwa [brothers]

OCE: Give trust ur intention pure akhi [brother]

VENTURA: like voice record ok akhi [brother] I will have by tomorrow

OCE: Yes akhi [brother].

16. On or about August 4, 2021, VENTURA, still using Mobile Messaging Account 1, sent the OCE an audio file containing his pledge of allegiance to ISIS’s leader, Abu Ibrahim Al-Hashimi Al-Qurashi, by stating the following:

VENTURA: In the name of Allah, the most merciful, the most beneficent, I give the pledge of allegiance to Islamic Caliphate, the Shaykh, Abu Ibrahim al-Hashimi al-Qurashi, to hear and obey, in what is pleasing and displeasing, in times of ease and hardship, and selflessly, and to not contest argue question the matter of authority with those in charge, emir of Wilayat amaliyat askarat hijrat and such, except if we see open disbelief blatant kufr, which we have clear proof from Allah for, and to say the truth wherever I am, I am not afraid of Allah’s suitable reprimand, and Allah is the witness to what I have said.

17. On or about August 5, 2021, the OCE also inquired of VENTURA as to whether VENTURA would be interested in providing “sadaqah,” which I understand based on my training and experience is a term often used to describe donations to ISIS:

OCE: ... Want ask if willing give sadaqah before ur hijrah while wait for passport?"

OCE: Dawla use for medicine and generator gasoline much help mujahideen

VENTURA: oh yeah sure

OCE: Alhamdulillah may Allah azzawajal reward u akhi

OCE: Want be safe for u akhi

OCE: Many way for sadaqah not all safe for american

OCE: Have use crypto? bitcoin? litecoin?

VENTURA: I never use but could obtain I know a little about

OCE: This safe way

OCE: No trace complete aynonmous

VENTURA: "yea this would be safest akhi

OCE: Okay akhi khair

OCE: Anything help not need be much

OCE: I can give u address send to

OCE: U need make wallet tho

VENTURA: ok tell me what to use for make

VENTURA: and I will make

OCE: I need ask trusted brother I not smart on these things

OCE: I msg u later to tell?

VENTURA: Yes akhi

...

OCE: Also told that ikhwa have way to sell google card for money by use TOR

OCE: No sure if these easy for u akhi, not want make difficult

OCE: But u generous akhi and will much help mujahideen. will receive rewards int eh akhirah inshaallah

VENTURA: ATM for bitcoin down the street but never used it but I would buy a google card

OCE: This good akhi. I told that ikhwa can seel these for bit less and use money

OCE: Or use for pay for burner app to make phone numbers for dawla telegram account

VENTURA: I can get anycard google play also there is cards where you send the codes to the email would you like this?

OCE: Na'am ikhwa only need code

VENTURA: ok

OCE: Alhamdulillah may Allah azzawajal reward you akhi

VENTURA: "would you like a google play card or is there anybetter cards to buy?"

OCE: No send all money tho akhi u must save for ur hijra too. Just little to support the ikhwa while u wait

OCE: All same I think akhi but I told google from brother

VENTURA: okay I buy sometimes codes take a minute to get but I have within few hours

OCE: This ok akhi khair

OCE: I msg ikhwa to tell

OCE: Need email to send?

OCE: Or send here?

VENTURA: what is safer idk

VENTURA: I could send to my email and give code or send to you

OCE: I not send anything u send directly to dawla. not want make dangerous for u

18. Later that same day, VENTURA sent the OCE a redemption code for a Google gift card worth \$25. The OCE then asked VENTURA how he wanted ISIS to use the donation:

OCE: Wiliyat bro say can redeem code now and use to support dawla media if u want. Or can sell code on dark web for \$ and send \$ straight to mujahideen for help in fight against kuffar

OCE: How u want them use ur sadaqah akhi?

VENTURA: Up to him brother I might have more soon

VENTURA: this seems really untraceable

OCE: He want know from u akhi. You get reward in jannah so want make sure sadaqah used the way u want brother

OCE: And na'am it completely untraceable this why we use

VENTURA: Okay sell on darkweb

19. Based on my investigation, I believe that when VENTURA said that he wanted the OCE to "sell on darkweb," he did so because he believed, based on the OCE's

communications, that doing so would enable the OCE to send money “straight to mujahideen for help in fight against kuffar.” I also believe, based on my conversation described above, that VENTURA understood that providing material support to ISIS in the form of gift cards would be untraceable and would conceal that he was the source of the donations.

20. In a subsequent conversation in or around September 2022, VENTURA sent an email to the OCE that he could no longer “go for hijrah” because he “get hurt very bad in fall and can no longer walk.” However, based on my investigation – which included an FBI interview of VENTURA within approximately six days after the communication was sent – VENTURA had not actually been injured and could walk.

2023 Communications Regarding ISIS

21. On or about January 25, 2023, VENTURA (utilizing EMA Account 2) sent new messages to the OCE, stating that he wanted to travel to join ISIS (i.e., “hijrah”), as well as his desire to “give sadaqah” before he left, which from my training and experience means to make a charitable donation and, within the context of Islamist terrorist organizations, refers to providing support, often in the form of money or other donations. On that date, VENTURA and the OCE exchanged the following conversation:

VENTURA: Brother it is me I am safe alhamdulillah
VENTURA: We talk I check [messaging application] later
VENTURA: Brother tell me you are well inshaallah
VENTURA: If it is still possible for hijrah I am interested
VENTURA: Sorry for go dark Akhi I explain when we talk
VENTURA: I hope you still remember me Akhi
VENTURA: I have gifts for Ikwah [brothers] Akhi and I need to know if pickup brother is still safe?
VENTURA: Akhi I want to make hijrah as soon as possible Akhi I have lots of cash now that I want to give to Ikwah and want to give sadaqah before leave
VENTURA: I know I disappear I will explain Akhi we are brothers and I would never betray you
VENTURA: Inshallah you and pickup brother are well

OCE: Assalamu alaikum wa rahamatullahi wa baraktuh ya akhi

OCE: Alhamdulillah you okay no expect hear from u again

OCE: Na'am I remember you akhi subhanallah [glory be to God] but not recognize this @

OCE: You have mak new account?

OCE: Also how health akhi? Last speak say get hurt and in hospital and no make hijrah. Wallah you were in my dua [prayer] for many week and pray Allah give you complete shifa [health]

OCE: You are here akhi? Need speak of many thing inshaalah

VENTURA: Mashallah [What God has willed]

VENTURA: I make full recovery alhamdulillah

VENTURA: I have some gifts for Ikwah I give after we talk

VENTURA: Is pickup brother well?

OCE: Alhamdulillah you healthy akhi

VENTURA: Naam I am strong and healthy alhumulillah

VENTURA: Fit to join mujhadeen

OCE: Before spek on this thing akhi need know safe for speak bc no talk to this @ before

OCE: You make new @ yes?

VENTURA: Naam is safe

VENTURA: I use other phone for regular stuff this phone is moto g phone but still works fine

VENTURA: I can put lockcode on [EMA Account 1]

OCE: I know what brother look like. Send many picture when talk before

VENTURA: The brother you help with hijrah was successful?

VENTURA: I can send new picture

OCE: Can send picture w date somehow so know not kuffar spy

VENTURA: It's me not worry Akhi

OCE: Sorry for ask for this thing

OCE: Can delete after

VENTURA: Naam can take now

OCE: Ok akhi khair [benevolent brother]...

VENTURA: Wait I send now

VENTURA: I have beard now

22. VENTURA then sent a video of himself to the OCE. Based on my investigation, including my own personal interactions with VENTURA in 2021 and from viewing VENTURA's passport photograph, I recognize the individual in the video to be VENTURA.

23. The OCE and VENTURA then exchanged the following communications:

OCE: Alhamdulillah allahu akbar you look strong akhi

OCE: Look like lion

VENTURA: Naam I am ready to become one

VENTURA: Inshaallah

OCE: Inshaallah akhi. You have many trials u have overcome.

VENTURA: I send sadaqah when done chat but can go for now we talk tomorrow Akhi can start to plan hijrah and can you speak pickup brother?

VENTURA: Naam but am strong with help from Allah and inshallah hijrah will be successful this time

VENTURA: The kuffar may plan but Allah also plans

OCE: I msg brother inshaallah. He help 2 month ago with different brother so know he is okay alhamdulillah.

VENTURA: OK understand not matter if Arabic brother if must smuggle I can pay

VENTURA: Have lots of cash

OCE: Akhi must ask thing before talk to brothers about this

VENTURA: OK

OCE: You gone for many month and say hurt

OCE: Why want hijrah now?

OCE: And life of mujahid is not easy one akhi

OCE: You know this from talk before

VENTURA: Because Akhi I have use staying here in dar al kuffar [abode of the disbelievers] and I want to give my life to Jihad

OCE: Need know injury not stop you from fight

VENTURA: Can run and walk

VENTURA: No permanent damage make full recovery

OCE: Alhamdulillah this good news

VENTURA: Must talk with brother pickup brother I give sadaqah just must take picture I am going to order more cards Google play inshaalah

OCE: When need leave for hijrah

VENTURA: Understand jihad against kuffar is hard struggle

VENTURA: Want to leave start of next month

VENTURA: Before I leave I send as much sadaqah as can

24. On or about January 25, 2023, VENTURA sent the OCE a screenshot of a \$25 Google Play rewards card, along with the redemption code. Based on my investigation, I understand that VENTURA provided the OCE with this Google Play rewards card in order to “give sadaqah” in order to benefit ISIS, as he had promised to do. After receiving the screenshot, the OCE told VENTURA that it had “been long time since send any cards for sadaqah.. so want to make sure intention not change. What you want \$\$ go for?” VENTURA replied: “for war on kuffar” (i.e., disbelievers).

25. The OCE then informed VENTURA “OK ...I already send card to the Sinai... I know have much need for buy ammunition and explosive right now... Also need give update cause some thing change with how dawla take sadaqah now... Not sure if remember from old chat but dawla sell card on dark web for little less \$ than worth and use profit for support mujahideen.” VENTURA subsequently responded “Understand Can sell not matter if get a

little less. I get more sadaqah soon.” VENTURA subsequently sent the OCE two additional Google Play gift cards worth \$25 each.

26. On or about January 26, 2023, when asked about hijrah (i.e., traveling to join ISIS), VENTURA stated “I want to give my life for jihad fisabillah [for the sake of Allah] intention is pure from heart,” and also stated that he would “make good fighter for dawla.” As described above, I understand “dawla” to mean ISIS.

27. On or about January 26, 2023, VENTURA asked the OCE if VENTURA could perform an “ishtishadi” attack. VENTURA further informed the OCE that he wanted to fight for ISIS for a couple of months, but then became a “shashid” (i.e., a martyr) via the ishtishadi operation.

28. On or about January 26, 2023, VENTURA also sent an audio file to the OCE in which VENTURA stated that he gave “the pledge of allegiance to Islamic State Caliphate.”

29. On or about February 20, 2023, VENTURA told the OCE that “I am going to apply for credit cards inshaallah this make my hijrah much easier”.

30. On or about February 25, 2023, VENTURA asked the OCE: “...get card in two days would the first of next month work?”

31. On or about February 28, 2023, VENTURA told the OCE: “Get card work on get ticket”.

32. On or about February 28, 2023, law enforcement personnel learned that VENTURA had booked tickets six separate times within a one hour period for the same overseas trip with a stop in Zurich, Switzerland. The tickets were booked on Expedia, but no form of payment was entered for the booking. As a result, the airline did not issue the tickets.

33. On or about March 2, 2023, VENTURA informed the OCE that "...sorry card fail and I panic but card is fixed now and have new sorry this...". On the following day, VENTURA continued with "...sorry got busy we replan next week" and "Naam been look at swiss flight that are 12hrs arrive fast so would buy ticket day before leave and send so thing could be planned inshaallah".

34. On or about April 5, 2023, VENTURA informed the OCE that "...I remember what you say about Jihad fisabillah during Ramadan and was thinking of replanning for soon. I am going to start look at flights but as we agreed before not prepare till have ticket."

35. On or about April 7, 2023, VENTURA informed the OCE "... I start look at flights... make Dua for me for strength for hijrah..." and "...I look at flight in a few days I most likely try for two way flight for less suspicion inshaallah." On that same day, he said "I plan for flight on the 10th inshaallah I send ticket when have we talk soon khair inshaalah."

36. On or about April 9, 2023, The OCE asked Ventura if he would want to participate in an ISIS operation on Eid al-Fitr or go straight to the ISIS training camp. On or about April 10, 2023, VENTURA responded to the OCE "Be party of attack" and "Then can send to training camp"

37. In the same conversation, VENTURA told the OCE, "I plan buy ticket for tonight or tomorrow night inshaallah".

38. On or about April 10, 2023, VENTURA purchased a ticket for a Turkish Airlines flight from Boston with an ultimate destination of Cairo, departing at 11:10pm on April 10, 2023. VENTURA also sent a screenshot confirming his itinerary from Boston to Cairo to the OCE. However, VENTURA did not depart his residence that evening nor did he cancel or reschedule his flight.

39. On or about April 10, 2023, at approximately 10:50pm, the FBI received an electronic tip (E-tip) to the FBI's National Threat Operations Center (NTOC) from an anonymous source stating the following:

I want 10 million dollars in duffel bags and time to get money in proper places you know who I am you already lost my trust so if you want information on attacks you must pay if you want to save lives and do you're job this offer here is you're final chance I want the Cash and Immunity no funny games I known you thought I am retarded fool but jokes on you I will not admit I sent this or communicate until the cash is delivered [FBI AGENT 1] I am speaking to you dumb little bimbo this is my only offer try more offensive actions and you will regret it do what I ask and I will help you simple as this Cash and immunity Cash delivered first 10 mill duffel bags front door no jokes I am not joking or playing funny games you have already lost my trust and this is you're last chance to fix it text or email me when my demands are accepted then give some days and we can talk in person. We have 1 week or 2 until attacks I have information about happen and much more if do what I tell 🖐

40. On or about April 11, 2023, VENTURA called the FBI Boston Operations Center requesting to speak with someone because he wanted to help with "terror".

41. On or about April 12, 2023, at approximately 2:14pm, VENTURA called the FBI Boston Operations Center requesting to speak with FBI AGENT 1 because he had information about urgent incoming terror attacks, but would not provide any further information to the Operations Center Technician.

42. On or about April 12, 2023, at approximately 3:03pm, VENTURA called the FBI Boston Operations Center requesting to speak with an agent again regarding upcoming terror attacks. VENTURA stated the attacks would take place overseas and would happen in the next 1-2 weeks. He said the sooner agents call him back, the sooner they can "make the deal".

43. On or about April 12, 2023, at approximately 4:43pm, FBI personnel placed a call to VENTURA. On the call, VENTURA stated he had information regarding upcoming mass

attacks in Egypt planned by Daesh in Sinai. He stated the attacks were scheduled to take place around the time of Eid al-Fitr. VENTURA also stated that he had information pertaining to ISIS recruiters and individuals who facilitate travel to ISIS.

44. On or about April 13, 2023, at approximately 7:55am, VENTURA wrote-in an electronic tip (E-tip) to the FBI's National Threat Operations Center (NTOC) requesting a call back by April 14, 2023. He requested 10 million dollars and immunity in exchange for information he believed would stop an ISIS attack.

45. On or about April 20, 2023, at approximately 9:44am, FBI personnel placed a call to VENTURA. They advised VENTURA that the information VENTURA provided earlier was not specific and therefore not actionable.

46. On or about April 20, 2023, at approximately 12:25pm, VENTURA wrote-in an electronic tip (E-tip) to the FBI's National Threat Operations Center (NTOC) stating he was okay with the FBI's decision, and requesting for the FBI to never speak to him again.

47. On or about April 20, 2023, VENTURA, at approximately 10:01 am, contacted the OCE, stating "i I am okay alhamdulillah flight get cancelled and I panic".

48. On or about April 21, 2023, VENTURA informed the OCE, "There is spy's in you're ranks kuffar already know somehow many mujhadeen where save operations must be replanned".

49. On or about April 25, 2023, VENTURA described to the OCE why he had been unable to travel on to join ISIS earlier in the month. He told the OCE: "Many things happen not go as plan", "Family not go to sleep at right time Uber app not work I panic 😞", and By time family sleep Akhi was too late for make flight and had to cancel 😞".

50. On or about April 25, 2023, VENTURA inquired to the OCE if he could make hijrah to Khorasan [Afghanistan] and stated, “I want to do ishtisbadi attack”, referring to an istishhad [martyrdom operation]. On or about April 26, 2023, he informed the OCE that he was considering traveling to Cairo without having an ISIS member ready to meet him, so that he would not “waste [their] time” as he had done before. Instead, after he arrived in Cairo he could message an ISIS member to come get him, and while waiting, could “stay in hotel a few nights”.

Summary of Financial Support Provided by VENTURA to ISIS

51. Between approximately August 2021 and August 2022, VENTURA, while still a juvenile, provided approximately twenty-six gift cards to the OCE totaling approximately \$965, with the intent that the money from the resale or redemption of these gift cards would be used to support ISIS and its fighters.

52. After he turned eighteen, between January and May 2023, VENTURA provided the OCE with 16 electronic gift cards totaling an additional \$705, with the intent that the money from the resale or redemption of these gift cards would be used to support ISIS and its fighters.

A table of those donations is below, with adult donations highlighted in blue:

Date	Brand	Amount
8/5/2021	Google Play Store	\$25.00
11/11/2021	Gamestop	\$40.00
11/19/2021	Dick's Sporting Goods	\$25.00
12/3/2021	Playstation Network	\$25.00
1/2/2022	Playstation Network	\$75.00
1/7/2022	Amazon	\$25.00
2/8/2022	Google Play Store	\$20.00
2/13/2022	Google Play Store	\$20.00
2/21/2022	Google Play Store	\$70.00
3/6/2022	Steam	\$20.00
3/6/2022	Steam	\$20.00
3/11/2022	Steam	\$20.00
3/11/2022	Steam	\$20.00
3/11/2022	Steam	\$20.00

3/24/2022	Steam	\$50.00
3/24/2022	Steam	\$50.00
4/12/2022	Playstation Network	\$50.00
4/16/2022	Steam	\$20.00
4/16/2022	Steam	\$20.00
4/22/2022	Playstation Network	\$75.00
5/6/2022	Google Play Store	\$50.00
5/13/2022	Steam	\$50.00
5/13/2022	Steam	\$50.00
5/27/2022	Google Play Store	\$50.00
6/27/2022	Google Play Store	\$50.00
8/1/2022	Google Play Store	\$25.00
1/25/2023	Google Play Store	\$25.00
1/26/2023	Google Play Store	\$25.00
1/26/2023	Google Play Store	\$25.00
1/27/2023	Google Play Store	\$25.00
1/29/2023	Amazon	\$25.00
2/5/2023	Google Play Store	\$100.00
3/1/2023	Google Play Store	\$100.00
3/1/2023	Google Play Store	\$25.00
3/3/2023	Google Play Store	\$50.00
3/8/2023	Google Play Store	\$25.00
3/13/2023	Google Play Store	\$25.00
3/24/2023	Google Play Store	\$25.00
3/26/2023	Google Play Store	\$10.00
3/27/2023	Google Play Store	\$100.00
4/7/2023	Google Play Store	\$25.00
4/27/2023	Google play store	\$50.00
5/16/2023	Google Play Store	\$45.00
TOTALS		\$1,670.00
ADULT		\$705.00
JUVENILE		\$965.00

53. In addition, I believe that VENTURA used the gift cards in order to conceal the source of the material support or resources. In addition, as described above, his initial conversation with the OCE about providing donations in or around August 2021, VENTURA asked the OCE which method was safer: sending the redemption codes by email or through the

encrypted application. After making his first donation, VENTURA also commented that “this seems really untracable [sic].”

CONCLUSION


54. Based on the information described above, there is probable cause to believe that between on or about January 25 and May 16, 2023, VENTURA knowingly concealed or disguised the nature, location, source, ownership, or control of any material support or resources, or any funds or proceed of such funds, knowing or intending that the support or resources were to be provided in violation of 18 U.S.C. § 2339B, in violation of 18 U.S.C. § 2339C(c). Accordingly, I respectfully request that this Court issue a criminal complaint charging VENTURA with a violation of this crime and issue a warrant for his arrest.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Paul Lagno
FBI Special Agent

Time and Date: 5:22 p.m. **Jun 7, 2023**

Notice is hereby provided that, pursuant to Federal Rule of Criminal Procedure 4.1, the affiant was sworn by telephone on the date and time indicated above and on the complaint issued by the court.


Hon. David H. Henn
United States Magistrate

