

11:26 am, Oct 15 2024

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY R.M. Deputy

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Jonathan Evans, being first duly sworn, hereby depose and state as

follows:

PURPOSE OF THE AFFIDAVIT

1. I submit this affidavit in support of an application for a Criminal Complaint charging **Michael Sam TEEKAYE, Jr.** (hereinafter, **TEEKAYE**) with attempting to provide material support or resources to a designated foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham (“ISIS”), in violation of 18 U.S.C. § 2339B.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

BACKGROUND OF AFFIANT

3. I am a Special Agent of the Federal Bureau of Investigation (“FBI”), United States Department of Justice, and have been since 2022. During my career with the FBI, I have been assigned to investigations of international terrorism and have been trained by the FBI in a variety of investigative techniques required to facilitate these investigations. Among other things, I have participated in a variety of law enforcement activities, including investigations, arrests, searches, seizures, interviews, debriefing informants, review of taped conversations and records, and surveillance. Additionally, I have participated in several investigations involving the use or

possession of firearms by persons prohibited, and violations of the National Firearms Act. I am currently a member of an international terrorism squad of the Baltimore Joint Terrorism Task Force in the FBI Baltimore Division.

FACTS IN SUPPORT OF PROBABLE CAUSE

4. On or about October 15, 2004, the United States Secretary of State designated Jam'at al Tawid wa' al-Jahid (popularly known as "al-Qaeda in Iraq" (AQI)), as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity 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 Immigration and Nationality Act 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 of State 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-Furquan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. ISIS remains a designated FTO.

5. On February 26, 2008, the United States Secretary of State designated al-Shabaab as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. Al-Shabaab remains a designated FTO.

A. TEEKAYE has a documented history of violent behavior and radical Islamist ideology

6. Michael Sam **TEEKAYE** was born in August 2003 and is a 21-year old resident of Hanover, Maryland in Howard County. **TEEKAYE**'s mother is from Sierra Leone, and his father is from Liberia. **TEEKAYE** lives with his parents and older sister. **TEEKAYE** recently worked at Restaurant 1 in Arundel Mills, Maryland.¹ **TEEKAYE** has a history of mental illness, and has been diagnosed with autism spectrum disorder, mild intellectual disability, obsessive compulsive disorder, unspecified depressive disorder, and early onset schizophrenia.²

7. **TEEKAYE** has made documented threats of violence against his peers since at least September 2019. In September 2019, **TEEKAYE** was the subject of an Emergency Petition, which is a brief involuntary detention of a person who is believed to have a mental illness. A Howard County Police Department report dated October 1, 2019 indicates that the Emergency Petition was initiated partly because **TEEKAYE** "admitted he wanted to cut the head off of [a fellow student] and kill him."³

8. The FBI learned of **TEEKAYE** in December 2019 when the FBI was made aware of a social media account operated by **TEEKAYE** expressing extremist Islamist ideology. Shortly

¹ FBI Baltimore has observed **TEEKAYE** working at Restaurant 1 as of August 9, 2024. Additional records received from Stride Bank revealed payroll from Restaurant 1 as of August 2024. As discussed further below, investigators believe **TEEKAYE** no longer works at Restaurant 1 and now works at Restaurant 2.

² This information comes from the "History of Present Illness" section of records received from the Regional Institute for Children and Adolescents (RICA).

³ See Howard County Police Department Case No. 19-89611.

thereafter, **TEEKAYE** began interacting with a male Online Covert Employee (“OCE”). In conversations with the OCE via Instagram between December 4, 2019 and early January 2020, **TEEKAYE** told the OCE that his previous Instagram account had been disabled because he was “posting ‘terrorist content.’” **TEEKAYE** also told the OCE that he had communicated with a “brother” online who asked **TEEKAYE** if he “supported the state and the cause” and wanted **TEEKAYE** to “carry out an attack.” In conversations with the OCE via Telegram between January 11, 2020 and January 14, 2020, **TEEKAYE** told the OCE he was communicating via Telegram with a “sister” in a refugee camp overseas who used to live in ISIS territory and still supported ISIS. **TEEKAYE** also told the OCE he wanted to arrange a marriage to a Muslim woman.

9. On January 17, 2020, via Telegram, **TEEKAYE** told the OCE: “I’ve been thinking of making Hijra⁴ to Somalia.” The OCE asked when, to which **TEEKAYE** replied, “I don’t know when I get older you want to come?” The OCE said, “Akhi I am willing but how would we get there? Do you have a contact who can help us?” **TEEKAYE** responded, “No but it’s easier since it’s a poor country we can just go to a village that they control.” When the OCE asked who they would join, **TEEKAYE** replied, “The Islamic state or al shabab.” He added, “I say al shabab, you[?]” Between January 17, 2020 and January 22, 2020, **TEEKAYE** continued to discuss plans to travel abroad to join al Shabaab with the OCE via Telegram.

⁴ “Hijra,” alternatively spelled “hijrah,” is an Arabic word meaning “exodus, migration, or breaking of ties.” Based on my training, experience, and participation in this investigation, I know that “hijra” is often used by those with extremist views to describe a foreign fighter’s journey abroad to wage jihad.

10. On January 23, 2020, the FBI spoke to **TEEKAYE** and his parents and conducted a consensual search of **TEEKAYE**'s cell phone and laptop.

11. Around this same time, **TEEKAYE** was the subject of another Emergency Petition by the Howard County Police Department⁵ and was hospitalized at the Psychiatric Institute of Washington (PIW). **TEEKAYE** said during his intake interview at the Regional Institute for Children and Adolescents (RICA) that he was admitted to PIW, "...because I was a danger to myself and others...It means I was making threats, saying I wanted to kill my parents or something...because I was angry at them...because they kept getting me mad and angry, I guess. They were screaming at me and stuff...I guess because of what happened with the FBI and stuff...They found stuff on my phone...like radical Islam stuff." The PIW admission assessment documented that **TEEKAYE** was found to be "obsessed with Muslim culture, posting social media with terrorist material, threatened to kill all Americans, threatened to kill [his] parents. His outpatient psychiatrist was concerned about his homicidal ideation and increasing aggression."

12. On February 7, 2020, **TEEKAYE** was interviewed by FBI agents at his home. This interview took place in the presence of his parents because he was then 16 years old. **TEEKAYE** was interviewed because of online, publicly accessible postings indicating possible identification with radical Islam. **TEEKAYE** admitted being in contact with "fighters" and said that, at times, he planned to become a fighter in an overseas location. **TEEKAYE** told the agents his desire to go overseas as a fighter had waned, and he felt he was being used by people online. **TEEKAYE**

⁵ See Howard County Police Department Case No 20-6771.

claimed that he was no longer radicalized. He also said that because the FBI was watching him, he would not have a chance to pursue efforts to fight overseas.

13. On July 19, 2022, a Howard County police officer (Officer 1) responded⁶ to an elementary school in Columbia, MD, regarding a male subject in the school parking lot wearing a black face mask and holding a large, fixed-blade knife. This individual was later identified as **TEEKAYE**, who was then 18 and an adult. **TEEKAYE** refused to speak with Officer 1 and kept stating “you need to leave.” Eventually **TEEKAYE** complied with Officer 1’s verbal commands to drop the knife. During the search of **TEEKAYE** incident to arrest, a second pocketknife was found on **TEEKAYE**’s person. While in custody, **TEEKAYE** made several comments to Officer 1 that he was going to get the knife back and kill all the officers. During an interview, **TEEKAYE** stated he was at the school to fight a classmate with whom he was having conflicts.

14. Following the incident, **TEEKAYE** pleaded guilty to a misdemeanor charge of disorderly conduct, and was given Probation Before Judgment and placed on supervised probation until September 2025.⁷

B. In 2023, TEEKAYE expressed an intent to join ISIS in Africa

15. Between March 11, 2023 and April 13, 2023, **TEEKAYE** had multiple conversations with a female Undercover Officer (UCO) via Instagram and WhatsApp. The UCO preserved these communications. In a conversation using Instagram on March 11, 2023, **TEEKAYE** and the UCO discussed Islam, and **TEEKAYE** described himself as a “revert.”

⁶ See Howard County Police Department Incident Report for Case No: 220063021.

⁷ See District Court of Maryland for Howard County Case No: D-101-CR-22-000889.

TEEKAYE also messaged the UCO about how he had refrained from certain online activity in order to avoid law enforcement scrutiny:

“I remember when my accounts would get shut down all the time Because of them not liking what I was posting until I just stopped posting those things Because also it brings the feds to keep an eye on you on here as well.”

16. On March 28, 2023, **TEEKAYE** engaged in a conversation on WhatsApp with the UCO using a phone number ending in 8887. Based on my knowledge, training, and experience, people who are concerned about being detected by law enforcement often use WhatsApp messaging because it is end-to-end encrypted. In this March 28 conversation, **TEEKAYE** talked about wanting to go to Africa. He asked the UCO, “Would you possibly want to go in the same path as me?” The UCO responded, “Which is ?? Lol idk [I don’t know] your path.”As shown below in Photo 1, **TEEKAYE** replied, “My goal when I get to Africa is Fisabilillah⁸ to make Allah’s works the highest And to work to establish sharia And khilafah.” He also asked whether the UCO had a passport or had access to a passport. **TEEKAYE** also stated he would delete the messages after UCO’s response. Based on my knowledge, training, and experience, people often delete messages sent to one another when they want to avoid detection by law enforcement.

⁸ “Fisabilillah,” alternatively spelled “Fi sabilillah,” is an Arabic expression meaning “in the cause of God” or “for the sake of God.”

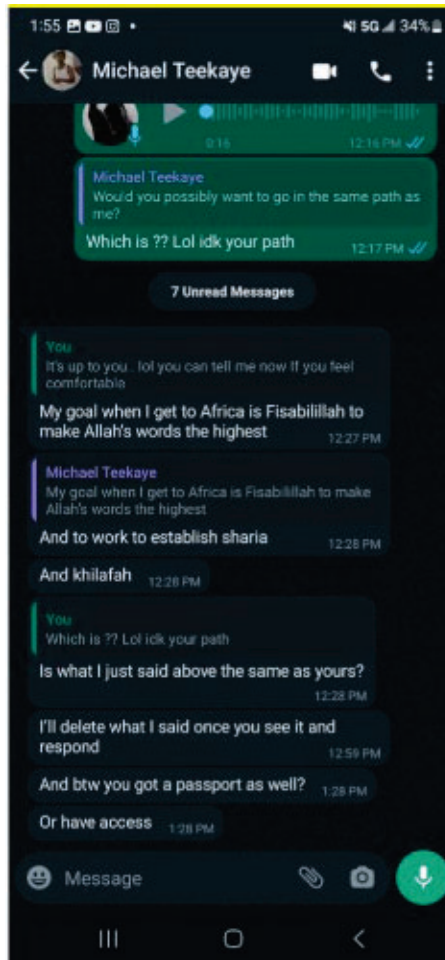


Photo 1

17. The UCO then asked **TEEKAYE** which group in Africa he would want to join, saying, “So I know there are multiple groups in Africa but which one[?]” **TEEKAYE** responded, “The Dawlah,” and then deleted the message. As noted above, “dawlah” or “dawla” is another term for ISIS. Below is a transcript of part of the communication that followed:

[2:03 PM, 3/28/2023] UCO: You mean !s⁹ or al shabaab ?

[2:03 PM, 3/28/2023] **TEEKAYE**: !s

⁹ Based on my knowledge, training and experience, it is common for individuals who wish to evade social media censors to utilize “!s” to denote the Islamic State or ISIS.

...

[2:05 PM, 3/28/2023] UCO: !s as a Mujahideen?¹⁰

[2:05 PM, 3/28/2023] **TEEKAYE**: Yes

[2:05 PM, 3/28/2023] **TEEKAYE**: Do you have the same goals?

[2:06 PM, 3/28/2023] UCO: Yeah I do

[2:06 PM, 3/28/2023] **TEEKAYE**: Al hamdulillah¹¹

[2:06 PM, 3/28/2023] **TEEKAYE**: Delete some stuff as well in the chat you wrote

18. When the UCO asked if **TEEKAYE** had pledged to ISIS, **TEEKAYE** responded:

“No I haven’t but the thing is to avoid suspicion I’ll be in an African country near to the countries where jihad is taking place, and Insha’Allah when the time comes or when I feel it’s right I’ll move into those countries and travel to them for either ‘business’ purposes or for other ‘reasons.’”

He added, “And a lot of the places jihad occurs in west Africa has alot of lawless terrain etc.”

19. Later in the conversation, **TEEKAYE** asked the UCO whether the UCO would be comfortable leaving the UCO’s family and going to Africa with **TEEKAYE**. The UCO responded: “Well please don’t take this the wrong way but I can’t marry you.. I’m not looking for marriage.. it’s a lot to it that I can’t explain through the phone but in shaa allah when we meet I will explain to you why.”

C. TEEKAYE stated he will conduct an attack against Jews or supporters of Israel in Maryland

20. On April 12, 2023, **TEEKAYE** told the UCO via WhatsApp, “If I don’t become a mujahid there I will become a mujahid here lol.” The UCO asked whether **TEEKAYE** meant he would do an attack here in the United States, and **TEEKAYE** replied in the affirmative. The UCO

¹⁰ “Mujahid” (pluralized as “mujahideen”) is an Arabic term that refers to a person who fights on behalf of Islam or the Muslim community.

¹¹ “Al hamdulillah,” alternatively spelled “alhamdulillah,” is an Arabic phrase meaning “praise be to God.”

asked **TEEKAYE** whether he had thought about where he would conduct an attack in the United States. The following is a portion of the conversation that followed:

[11:40PM, 4/12/2023] **TEEKAYE**: Lol any place or higher up person that supports Israel as a country that's near me

[11:40 PM, 4/12/2023] **TEEKAYE**: You talking like you want to do an attack with me hahahahah

[11:43 PM, 4/12/2023] **TEEKAYE**: But Hijra is my plan A

[11:43 PM, 4/12/2023] **UCO**: What place has the most Israeli

[11:44 PM, 4/12/2023] **TEEKAYE**: One near me in Columbia

[11:44 PM, 4/12/2023] **TEEKAYE**: Like 7 minutes away

[11:44 PM, 4/12/2023] **TEEKAYE**: I think or more

[11:45 PM, 4/12/2023] **UCO**: You mean like jews or Israeli supporters

[11:46 PM, 4/12/2023] **TEEKAYE**: Both

21. In WhatsApp conversations with the UCO on April 12-13, 2023, **TEEKAYE** clarified that “plan A” is to go overseas, specifically West Africa, to conduct an attack. **TEEKAYE** stated that “plan B” is to conduct an attack in the U.S., but it is “too risky anyways.”

D. TEEKAYE trained with firearms and attempted to purchase a firearm

22. On May 20, May 31, and June 14, 2024, **TEEKAYE** purchased ammunition and range time at Cindy's Hot Shots (CINDY'S) on-site shooting range in Severn, Maryland. Range footage of **TEEKAYE** was available from June 14, 2024. The footage showed **TEEKAYE** loading the rifle and firing multiple rounds. **TEEKAYE** can also be seen using his cell phone to take photos/video of the rifle and of himself firing the rifle. Below is a still photo from that footage, Photo 2:



Photo 2

23. In or about June 2024, **TEEKAYE**, using Instagram, posted the following series of photos from CINDY'S shooting range. Photos 3 and 4 depict **TEEKAYE** manipulating and firing a rifle, and Photo 5 depicts the rifle. The blurring of **TEEKAYE**'s face in Photo 3 appears in the original Instagram post.

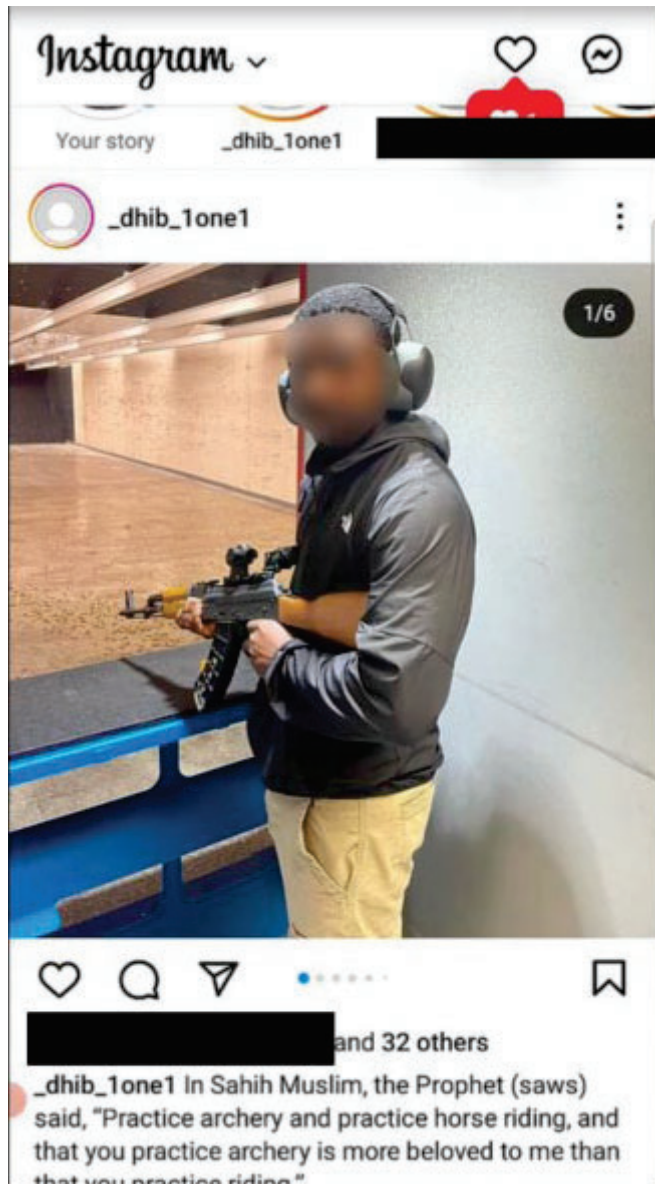


Photo 3

24. The caption for the series of Instagram photos reads, “In Sahih Muslim, the Prophet (saws)¹² said, ‘Practice archery and practice horse riding, and that you practice archery is more

¹² “Saws” is an abbreviation for “sallallahu alayhe wasallam,” an Arabic phrase meaning “peace be upon him.”

beloved to me than that you practice riding.” Based on my knowledge, training, and experience, I know this quote to be taken from an Islamic hadith¹³ used by extremists to justify preparation for violent acts.



Photo 4

¹³ Hadith (also used in the plural) is the body of sayings or traditions of the Prophet Muhammad, used by Muslims as a major source of religious law and moral guidance.

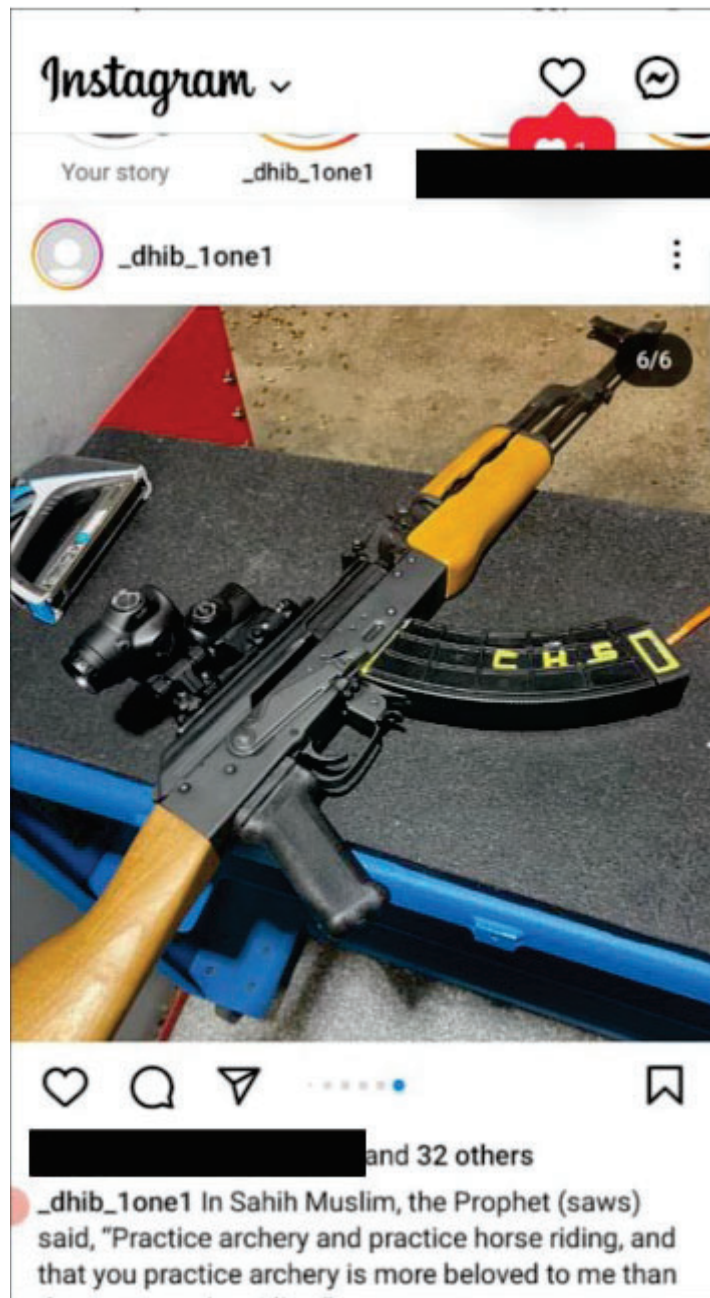


Photo 5

25. On July 12, 2024, **TEEKAYE** attempted to purchase a Kalashnikov K-9 9mm rifle at CINDY'S. Photo 6 is an image of **TEEKAYE** at CINDY'S:

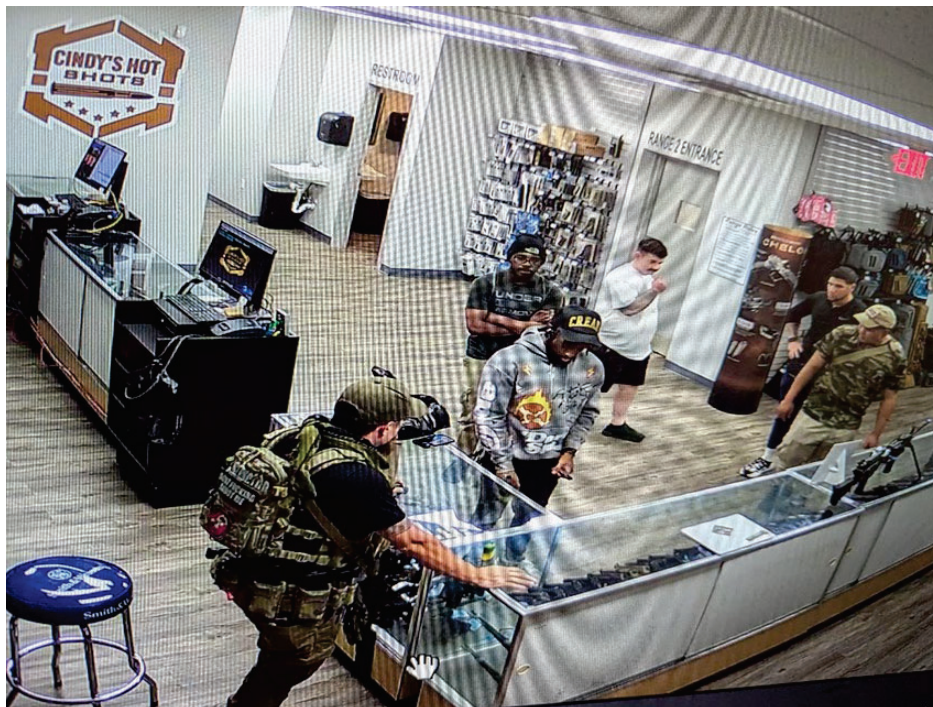


Photo 6

26. In Photo 6, **TEEKAYE** is seen wearing a black beanie, black T-shirt with 'Under Armour' written in gray lettering, and khaki-colored pants. Pictured in Photo 7 below is the exact rifle **TEEKAYE** attempted to purchase:



Photo 7

27. The purchase was denied on July 16, 2024 because **TEEKAYE** is currently on probation.¹⁴

28. In late July 2024, FBI Baltimore interviewed **TEEKAYE**'s assigned Maryland probation officer. The probation officer told FBI Baltimore that if **TEEKAYE** had access to a firearm or attempted to buy a firearm it would be a violation of one of the conditions of his probation. Specifically, the terms of **TEEKAYE**'s probation state he must "get permission from the court before owning, possessing, using, or having under your control any dangerous weapon or firearm of any description."

29. In the same conversation, the probation officer stated that to her knowledge, **TEEKAYE** has been complying with the conditions of his probation. However, the probation officer told your Affiant that **TEEKAYE** was impulsive and irrational and, based on her training and experience and personal perceptions of **TEEKAYE**, he could be the type to engage in violent activity such as a mass shooting.

E. TEEKAYE has continued to make plans to travel to Africa and join ISIS

30. In or about late July 2024, **TEEKAYE** told an FBI Confidential Human Source ("CHS") of known reliability that he had met a female on Instagram who claimed to be in a refugee camp in Syria known to hold females associated with ISIS. **TEEKAYE** told the CHS that the female put him in touch with "brothers"¹⁵ on the messaging application Telegram. **TEEKAYE**

¹⁴ See District Court of Maryland for Howard County Case No: D-101-CR-22-000889.

¹⁷ Based on my knowledge, training and experience, I know "brothers" to be a term often used to refer to individuals associated with ISIS.

told the CHS that according to the female and/or the “brothers,” he was supposed to fly to Ethiopia and then go to a neighboring country.

31. In or about early August 2024, in conversations with the CHS using Instagram, **TEEKAYE** said he had decided to go to Angola with his father for work rather than joining ISIS. **TEEKAYE** explained his change of heart was due to inconsistencies in what the Syrian female and the “brothers” on Telegram were telling him about the travel. Additionally, **TEEKAYE** expressed concern about not looking Somali and not blending in if he traveled there. **TEEKAYE** also said he was worried about “getting caught” by the “feds” for planning his trip to Ethiopia. **TEEKAYE** said he decided to delete the Telegram account he was using. When the CHS asked why **TEEKAYE** was deleting his account, **TEEKAYE** responded that he was, “getting rid of evidence.” **TEEKAYE** also said that when he expressed interest in joining ISIS in West Africa, the Syrian female made statements that **TEEKAYE** felt showed her to be incompetent. **TEEKAYE** told the CHS that he felt going now would be impulsive and that there was no rush to go now.

32. However, subsequently, on August 16, 2024, **TEEKAYE** had an audio conversation via WhatsApp with the UCO during which **TEEKAYE** told the UCO he was in contact with a Somali ISIS fighter regarding his plans to travel to Somalia to join ISIS. **TEEKAYE** told the UCO that according to the Somali ISIS fighter, **TEEKAYE** was supposed to fly first to Turkey, then to Ethiopia, and then cross the border into Somalia. **TEEKAYE** told the UCO that the Somali ISIS fighter made **TEEKAYE** an Ethiopian e-Visa to facilitate his travel. **TEEKAYE** provided the UCO the below photo of the e-Visa, which contained **TEEKAYE**’s biographical information and passport number, and which expired September 2, 2024:

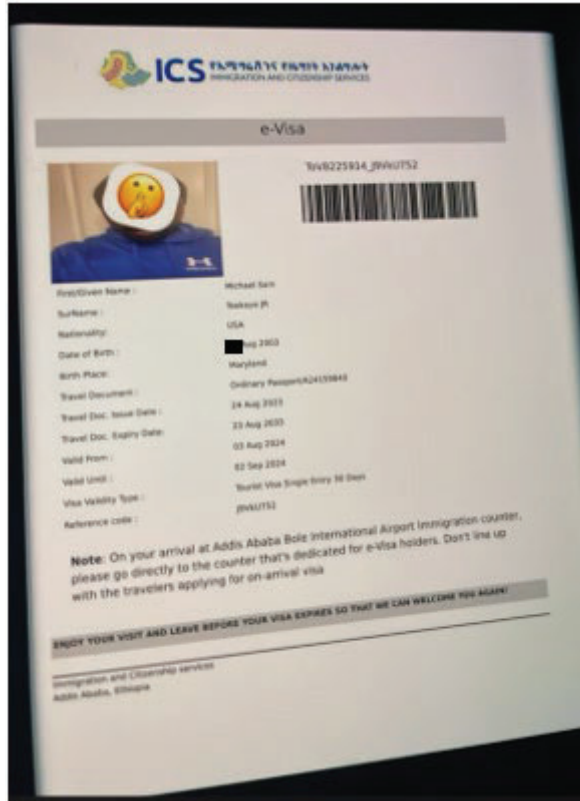


Photo 8

The emoji obscuring **TEEKAYE**'s photo in the e-Visa is from the original image **TEEKAYE** sent to the UCO.

33. Based on my knowledge, training, and experience, the acquisition of a valid passport and e-Visa obtained from an individual **TEEKAYE** identified as associated with ISIS, coupled with professed desires to join and conduct an attack with ISIS, indicate concrete steps taken to provide material support to a foreign terrorist organization.

34. In the same August 16, 2024 WhatsApp audio conversation with the UCO, **TEEKAYE** confirmed to the UCO that while he previously had planned to do an attack based in the United States, he has no current plans to do so. **TEEKAYE** explained that at the time he thought an attack in the United States would be easier because he could more readily get the

supplies needed. He further explained he thought he would be able to do the attack and then easily flee the country.

35. In the same August 16, 2024 conversation with the UCO via WhatsApp, **TEEKAYE** originally said he went to the shooting range to train and then just because he enjoyed it. Later in the conversation, **TEEKAYE** told the UCO that ISIS might not be the right group to join. **TEEKAYE** told the UCO he is currently focused on gaining knowledge and bettering himself until the right door opens. **TEEKAYE** reaffirmed his desire to leave the United States for West Africa, but said he is not sure if he is going to join a Jihadi group.

36. In a follow-up WhatsApp text conversation later that day with the UCO, **TEEKAYE** said "...to go over to a country and join a group is not a good option especially as a woman... Even for myself, I've been going to the masjid and trying to learn as much about the deen¹⁶ as possible and also trying to save up money and get into new things like my dads business or even cyber security."

37. In a September 1, 2024 conversation with the UCO via WhatsApp, **TEEKAYE** restated his intention to be an ISIS fighter. **TEEKAYE** told the UCO that he would "have to go to a training camp" once he travels. At one point in the conversation, **TEEKAYE** asked whether the UCO would want to get married once they were overseas. The UCO replied, "Yeah if allah permits." **TEEKAYE** later said that the UCO's role would be similar to that of the other wives of

¹⁶ "Deen," also anglicized as "din," is an Arabic word referring to the way of life Muslims must adopt to comply with divine law.

ISIS fighters. **TEEKAYE** remarked that the UCO would have tasks “like even cleaning my rifle maybe.”

38. Additionally, on September 1, 2024, **TEEKAYE** sent the UCO via WhatsApp an article titled “Terrorists at the gates of Niamey.” The article states that armed groups of “terrorists” have taken control of Tillaberi, near the Nigerian capital of Niamey. **TEEKAYE** told the UCO, “There was also an attack today by Daesh in Niger.” The following day, **TEEKAYE** sent the UCO a link to a news story about a person who was arrested after planning to join the Islamic State in Somalia.

39. In a September 2, 2024, conversation with the UCO via WhatsApp, **TEEKAYE** stated, “imagine we both get martyred¹⁷ or you get martyred before me.” In a follow-up conversation on September 3, 2024, **TEEKAYE** stated that women who get martyred “go down to the lowest heaven to watch their husbands who are still alive, fight in battle.”

40. In a September 26, 2024, conversation with the UCO via WhatsApp, **TEEKAYE** stated that an ISIS “brother” from Somalia reached out to him. **TEEKAYE** told the UCO that the “brother” is preparing another e-visa to Ethiopia and a plane ticket for him. Furthermore, **TEEKAYE** stated he should be ready to travel as early as September 30, 2024. Specifically, **TEEKAYE** stated, “I gave him my information again and he’s working on my visa...I think I might be out of the country by the 30th.” In a follow-up conversation, **TEEKAYE** told the UCO he assumed he would be leaving Wednesday or Thursday, but that the “brother” will tell him later.

¹⁷ Based on my knowledge, training, and experience, I know that individuals associated with ISIS commonly discuss becoming a “martyr,” by which they mean dying in a battle or attack they are engaged in on behalf of ISIS.

TEEKAYE stated he will be traveling from the airport closest to him directly to Ethiopia. However, he subsequently clarified that the “brother” told him he would first fly to Turkey.

41. In additional conversations with the UCO on September 26, 2024, **TEEKAYE** agreed to meet with the UCO before he traveled out of the country. Initially, **TEEKAYE** and the UCO scheduled the meeting for September 30, 2024. That meeting did not occur. In subsequent conversations on or about September 29, 2024, **TEEKAYE** suggested meeting either Thursday, October 3 or Friday, October 4. When asked whether **TEEKAYE** would like the UCO to drive him to the airport when he departs for Ethiopia, **TEEKAYE** stated “that is fine.”

42. On October 1, 2024, **TEEKAYE** sent the UCO an image of the new Ethiopian e-visa he received from the “brother,” shown as Photo 9 below. The new Ethiopian e-Visa is valid until October 28, 2024.

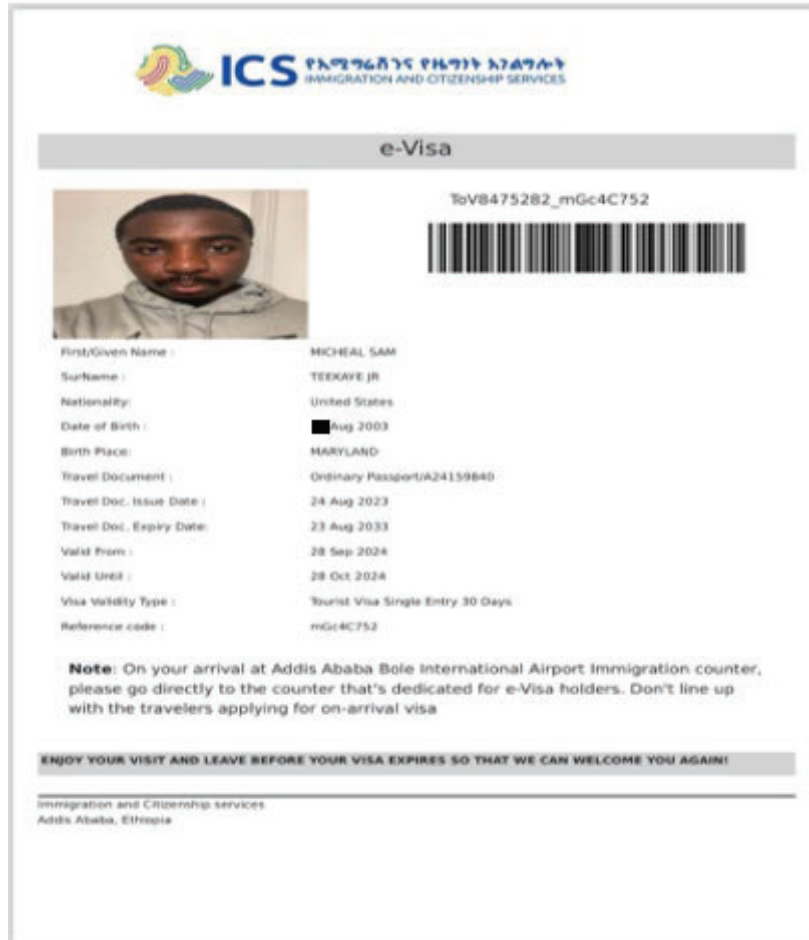


Photo 9

43. Also on October 1, 2024, the UCO told **TEEKAYE** to let the UCO know when **TEEKAYE** booked his plane tickets so the UCO could provide **TEEKAYE** with some money before his flight.

44. On October 3, 2024, **TEEKAYE** met in person with the UCO. **TEEKAYE** told the UCO that the “brother” said he would help **TEEKAYE** buy his plane tickets. **TEEKAYE** stated he was serious about going this time. When the conversation turned to money, the UCO said the UCO would still be willing to help **TEEKAYE** when he was overseas. **TEEKAYE** indicated to the UCO that he did have some money saved and that he got a job at Restaurant 2 and

was scheduled to start orientation the following week. **TEEKAYE** said he would get paid \$15 per hour on top of roughly \$100 per day in tips. When the UCO asked whether **TEEKAYE** was nervous about leaving, **TEEKAYE** said no, that he could not stop thinking about leaving, and that once he left he was not coming back. When the UCO asked what **TEEKAYE** would do if the “brother” wanted **TEEKAYE** to leave before the UCO could give **TEEKAYE** money, **TEEKAYE** said he would leave immediately and the UCO would not need to meet up with him. **TEEKAYE** stated they could figure out how the UCO could send money to **TEEKAYE** once he made hijrah. **TEEKAYE** stated he was only nervous about traveling by himself and getting through security at the airport because he was afraid the police would get him.

45. On October 4, 2024, **TEEKAYE** told the UCO via WhatsApp that he received a ticket from the “brother” for British Airways flight BA228 on October 14, 2024 at 9:25pm with a final destination of Turkey, departing from Baltimore/Washington International Airport (BWI), with a layover at London Heathrow Airport. **TEEKAYE** sent the UCO screenshots of the travel itinerary. The UCO told **TEEKAYE** the UCO would meet up with **TEEKAYE** before his flight that day and take him to the airport.

46. Later on October 4, 2024, **TEEKAYE** asked the UCO via WhatsApp whether the UCO would “still want to get married once we’re both over there?” The UCO replied, “In shaa allah.. let’s focus on you getting there first and then we will continue this topic.” **TEEKAYE** replied, “Ofc.” Later in the day, the UCO asked **TEEKAYE**, “You’re not making hijrah because of me right?” **TEEKAYE** responded “No,” and added, “I’ve been wanting to go.” The UCO said, “Lol haha ok good I was just making sure.” **TEEKAYE** added, “My Hijra to those lands is to only please Allah and help the religion and Muslims.” **TEEKAYE** also explained that the reason

he had delayed making Hijra in the past months was because he wanted to settle problems he was having with a particular masjid. **TEEKAYE** added, “Before I do serious things like what I’m about to do with Hijra I like to assess the situation and be a little patient.” **TEEKAYE** also said, “And btw I see for you not making Hijra or taking action is a deal breaker when it comes to marriage and other things.” He added, “So maybe that’s why you thought I was only doing it for marriage.” The UCO responded, “Alhamdulillah that’s how it’s supposed to be.” **TEEKAYE** replied, “Yeah ofc.”

47. In October 2024, investigators received records from British Airways pursuant to a federal grand jury subpoena. The records confirmed that flights were booked for **TEEKAYE** departing from BWI on October 14, 2024 at 9:25PM, traveling to London Heathrow Airport, and then continuing on to Istanbul, Turkey. Return flights were booked departing Istanbul on October 21, 2024, traveling to London Heathrow Airport, and continuing on to BWI. The records also indicated that the flights were booked through a third-party travel agency based in Germany, and that the fare was \$383.00 in US dollars (equivalent to 347.00 Euros), plus 478.10 Euros in tax, for a total of 825.10 Euros. The passenger phone number listed for **TEEKAYE** was a Czech phone number not otherwise known to be associated with **TEEKAYE**. Based on my training, knowledge, and experience, I know that individuals who wish to evade detection by law enforcement will commonly attempt to obfuscate the source of their purchases by using third party purchasers and/or by providing false contact information. I also know that individuals who make arrangements to travel overseas to join an FTO will commonly purchase round-trip airfare to avoid arousing suspicion by law enforcement.

48. On October 10, 2024, **TEEKAYE** sent the UCO the below photo of himself wearing a black mask and t-shirt and holding a large machete, along with the caption “Abdullah the islamophobe slayer.”

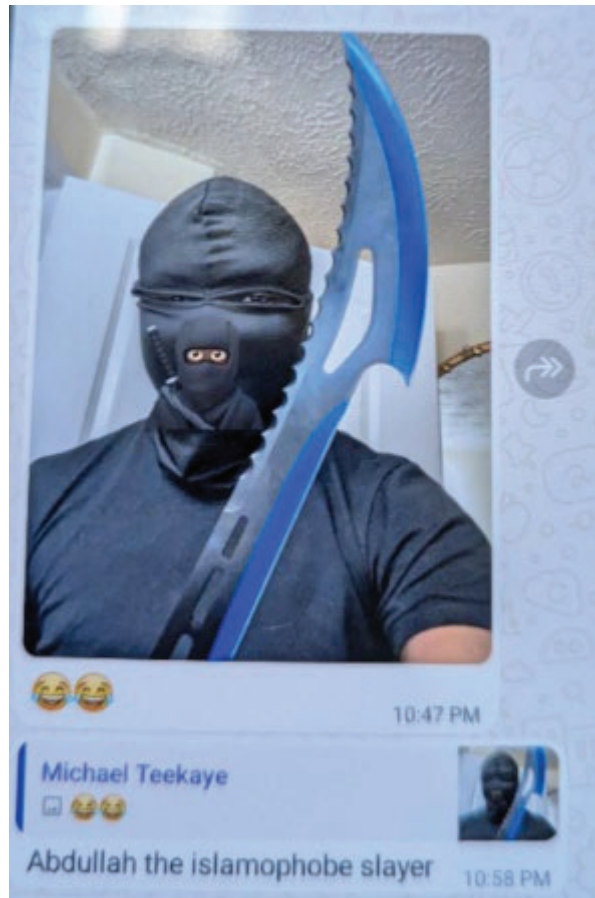


Photo 10

49. On October 11, 2024, the UCO said, “That’s a sick machete. Where did you get that from ? Lol I’m surprised your parents allowed you to keep that.” **TEEKAYE** responded, “On Amazon and eBay,” and sent the UCO a link to a similar machete for sale on Amazon. **TEEKAYE** explained that the machete was banned in the United Kingdom, and he told the UCO to “buy it after I leave just in case they track you or something.” **TEEKAYE** later added, “Victory or shahada.. either you do it here or over there or both.” Based on the context, as well as my training,

knowledge, and experience, I believe that **TEEKAYE** was referring to carrying out an attack either here in the United States or from overseas. **TEEKAYE** then told the UCO, “The brother should text me on Sunday.” The UCO replied, “You talking about me or you doing something here or there ?” **TEEKAYE** responded, “In general I mean.” **TEEKAYE** then explained, “Because I would never want you or any person who I’m in contact with who knows to get taken captive.” Based on the context, as well as my training, knowledge and experience, I believe **TEEKAYE** was indicating that he would not want the UCO to carry out an attack in the United States and get “taken captive,” *i.e.*, arrested by law enforcement. **TEEKAYE** then indicated he was not even sure the UCO should go into the airport with him, “Cuz there’s cameras everywhere lol.” The UCO responded, “Yeah completely understand. It makes sense.”

50. Later on October 11, 2024, the UCO asked, “[A]re you sure you want to make hijrah to dawlah ? Because you know once you go there’s no coming back.” **TEEKAYE** responded, “I am sure I did a lot of research and had to accept something’s that they are the only group that has the most true and sincere intentions.” **TEEKAYE** added, “And like I told you before I made sure to get rid of any doubts.”

51. On October 13, 2024, the UCO informed **TEEKAYE** that the UCO would not be able to drive **TEEKAYE** to the airport because of a family emergency. **TEEKAYE** said he understood.

52. On October 14, 2024, FBI agents observed **TEEKAYE** travel to BWI airport in a rideshare vehicle, check in for flight BA 228 bound for London, and proceed through the security checkpoint. **TEEKAYE** was arrested at approximately 5:59PM. After being advised of his *Miranda* rights, **TEEKAYE** made the following unprovoked statements, among others: “I’ll just

get out in 20 years and do something here. Okay? Okay? You will never stop me. Jihad will never stop.” **TEEKAYE** also made reference to a recent attack in which ISIS prison inmates killed four Russian penal colony guards. He continued, “I’ll be like 40 when I get out, then I’ll just do it. I don’t care. You will never stop me. Jihad will never stop. I’ll come and I’ll kill your soldiers. I’ll kill you, and I’ll kill” While making these statements, **TEEKAYE** began kicking one of the FBI arresting agents. He then stated that he hoped to “kill a guard” while in prison.

53. Shortly after **TEEKAYE** was arrested, FBI agents executed a search warrant at his residence in Hanover, Maryland. From **TEEKAYE**’s room inside the residence, agents recovered, among other things, Islamic books and teachings, Al Qaeda banners, and a laptop computer. From a hallway closet inside the residence, the agents recovered a large machete consistent with the one **TEEKAYE** is seen holding in Photo 10 above. **TEEKAYE**’s father told FBI agents that he had found the machete in **TEEKAYE**’s room and had taken it from him and stored it in the closet.


54. Based on my knowledge, training, and experience, I know that ISIS recruits and attracts individuals to join and fight for ISIS and to conduct violent terrorist attacks in the service of ISIS’s objectives. The provision and attempted provision of such material support in the form of personnel and services violates federal law.

55. **TEEKAYE**’s many conversations with both the UCO and the CHS over time, as well as his concrete steps to, among other things, train with firearms, attempt to purchase a firearm, obtain a passport, make contact with individuals identifying as ISIS to acquire an e-Visa and airline tickets, and proceed to the airport to board the flight, all support the conclusion that he intended and attempted to provide material support to ISIS, a foreign terrorist organization. In addition, **TEEKAYE**’s comments about deleting evidence and avoiding scrutiny by the “feds” indicate to

me that he knew ISIS was a designated foreign terrorist organization, understood the criminal nature of his plans, and wanted to be careful to minimize the chance that he would be thwarted by law enforcement.

56. WHEREFORE, based on the foregoing facts, I submit that there is probable cause to believe that Michael Sam **TEEKAYE** has attempted to provide material support to a designated foreign terrorist organization, in violation of 18 U.S.C. § 2339B.

Respectfully submitted,


Jonathan D. Evans, Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone, in accordance with Fed. R. Crim. P. 4.1 and 4(d) this 15th day of October 2024.





The Honorable Erin Aslan
United States Magistrate Judge