

FILED

UNITED STATES DISTRICT COURT

DEC 04 2024

for the

Eastern District of North Carolina

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY BPM DEP CLK

United States of America

v.

ALEXANDER JUSTIN WHITE
a/k/a "Sulalman Al-Amriki"

Case No.

5:24-MJ-2541-BM

Defendant(s)

CRIMINAL COMPLAINT

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 December 4, 2024 in the county of Wake in the Eastern District of North Carolina, the defendant(s) violated:

Code Section

Offense Description

18 USC § 2339B

Providing, Attempting, and Conspiring to Provide Material Support to a Designated Foreign Terrorist Organization.

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Complainant's signature

Monika Van Hooser, Special Agent, FBI

Printed name and title

Attested to by the complainant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (reliable electronic means).

Date: December 4, 2024; 9:45 pm

Judge's signature

City and state: Raleigh, North Carolina

BRIAN S. MEYERS, U.S. Magistrate Judge

Printed name and title

gjd

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

v.

ALEXANDER JUSTIN WHITE
a/k/a "Sulaiman Al-Amriki"

Case No. 5:24-mj-2541-BM

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Monika Van Hooser, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging **ALEXANDER JUSTIN WHITE**, also known as "Sulaiman Al-Amriki" (hereinafter "**WHITE**"), with knowingly attempting to provide material support and resources, as defined in 18 U.S.C. Section 2339A(B)(1), including personnel (including himself) and services to a foreign terrorist organization (FTO), namely the Islamic State of Iraq and al-Sham (ISIS), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated foreign terrorist organization and that ISIS had engaged in and was engaging in terrorist activity and terrorism – all violation of 18 U.S.C. § 2339B (Providing, Attempting, and Conspiring to Provide Material Support to a Designated FTO).

2. I have been Special Agent with the Federal Bureau of Investigation (FBI) since January 2017. I have been assigned to the FBI Charlotte Division, Raleigh Resident Agency Joint Terrorism Task Force (JTTF) since May 2020. Prior to May 2020, I was assigned to the FBI Washington Field Office's Counterterrorism Extraterritorial Unit as well as the JTTF. I have been trained in and have extensive experience with matters related to domestic and international

terrorism as well as the use of the internet, cellular smart phones, social media, and encrypted messaging applications (EMAs) to communicate with others engaged in criminal activity. My training and experience have provided me with an understanding of the criminal laws of the United States regarding national security and I am familiar with various ideologies supporting violence to achieve their goals to suppress others. I have conducted and participated in several investigations resulting in a wide variety of criminal charges, including many of which have involved persons conducting potential or actual acts of terrorism.

3. I have personally conducted this investigation and have witnessed many of the facts and circumstances described herein. These facts 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 requested criminal complaint and does not set forth all of the facts or all of my knowledge about this matter.

FACTS IN SUPPORT OF PROBABLE CAUSE

4. 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 and as a Specifically Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

5. 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 Specifically 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 of State added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. On February 28, 2018, the Secretary of State added ISIS-West Africa to the FTO listing with the following aliases: ISIS West Africa Province, Islamic State of Iraq and Syria West Africa Province, Islamic State of Iraq and the Levant-West Africa (ISIL-WA), and Islamic State West Africa Province (ISWAP). To date, ISIS and ISIS West Africa remain designated FTOs.

6. Abu Bakr al-Baghdadi ("al-Baghdadi") was the emir (leader) of ISIS until his death on or about October 27, 2019. The current emir of ISIS is Abu Hafis al-Hashimi al-Qurashi.

SUBJECT BACKGROUND

7. ALEXANDER JUSTIN WHITE, also known as "Sulaiman Al-Amriki," ("WHITE") is a 29-year-old United States Citizen, born June 5, 1995, who currently lives at 4600 University Drive, Apt 516, Durham, North Carolina, and who utilizes the phone number 423-744-4148 and email address alecw651995@gmail.com.

8. WHITE's primary social media account Facebook, UID 100001226275103¹ is represented by the name "Sulaiman Al-Amriki," however investigation discovered that the name on the Facebook page had previously been listed as "Alec White" as recently as June 2024. This is consistent with the act of using a "kunya" which is an Arabic term relating to the practice of referring to parents by the names of their children; however, your affiant knows the term to commonly be used by Islamic extremists as representing their taking on of a *nom de guerre* for

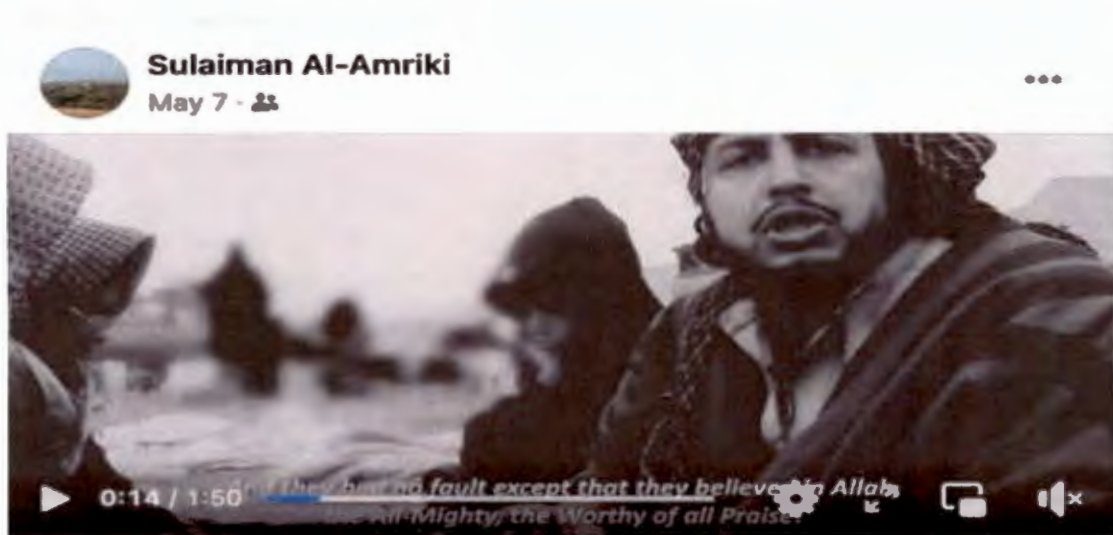
¹ Through the course of the investigation this UID was assessed to be WHITE's through IP address, phone and messaging activity, as well as GPS pings in combination with surveillance.

clandestine purposes. Here, WHITE took on the kunya “Sulaiman Al-Amriki” which translates to “Sulaiman the American.”

WHITE’S SOCIAL MEDIA POSTINGS DISPLAY SUPPORT FOR ISIS

Between May and October 2024, **WHITE** frequently used his Facebook account to make posts supporting ISIS and jihad. For example:

9. In May 2024, **WHITE** shared a post on his Facebook timeline of an ISIS propaganda video depicting a *jihadist*² singing a *nasheed*³ during the Battle of Baghouz. The Battle of Baghouz is commonly referred to as the last stand of ISIS in Syria, resulting in the territorial defeat of the ISIS-declared *Caliphate*.⁴ Your affiant is aware that this video is a popular video among ISIS supporters and is frequently circulated online to attract new members and generate a passion for fighting.



² “*Jihad*” is an Arabic term commonly used by ISIS supporters and extremists to mean violence against non-Muslims. A “*jihadist*” is an individual waging jihad.

³ “*Nasheed*” is an Arabic term generally understood to mean a chant which may or may not be accompanied with instruments. *Nasheeds* are often used by Islamic Extremists to spread propaganda.

⁴ The “*Caliphate*” (from the Arabic “*Khilafah*”) is a political institution led by a caliph, or leader, in the Muslim community; ISIS declared the establishment of an Islamic caliphate in June 2014 and the term is used to refer to the ISIS goal of establishing a physical religious state for the Islamic community.

10. In June 2024, **WHITE** shared a post on his Facebook timeline, from a channel on an EMA that focuses on fundraising for people in the camps in eastern Syria. The post included a video created by the “Green B1rds” propaganda network. The term green birds or green birds of *Jannah* (heaven) as a reference to martyrs⁵, and is commonly used by Islamic extremists to laud their fighters who have died through violent *jihad*.

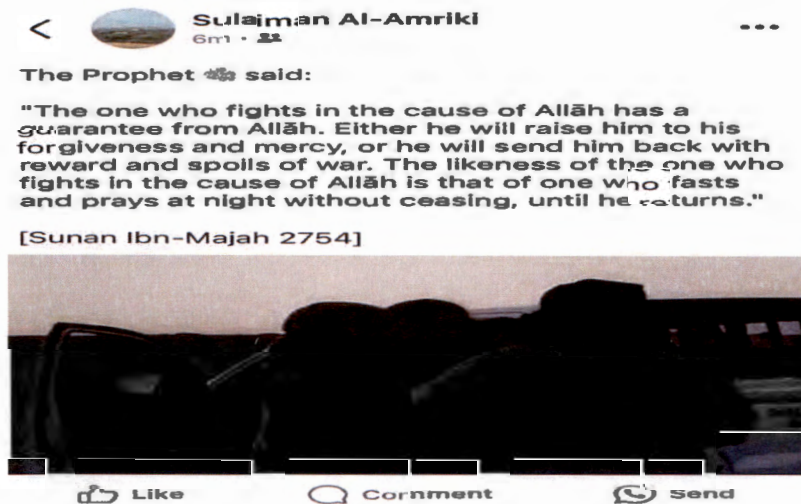


⁵ This arises from a “*hadith*” (a form of Islamic oral tradition) which states the souls of the believers are in the shape of a bird in paradise and as for the souls of martyrs, they are inside green birds.

11. In July 2024, **WHITE** posted a video on his timeline glorifying what is assessed to be ISIS and commented with a pointer finger raised emoji⁶ next to the word “*Baqiyah*.”⁷



12. On September 8, 2024, **WHITE** posted a quote stating, “The one who fights in the cause of Allah has a guarantee from Allah. Either he will raise him to his forgiveness and mercy, or he will send him back with reward and spoils of war.”



⁶ The raised index finger gesture, or “*tawhid*,” is often used to denote one’s belief in monotheism which is a key component of the Muslim faith and part of daily Islamic prayers. The “*tawhid*” finger is commonly used by ISIS militants to affirm their ideology and to signal their support for acts of terrorism toward anything against Allah.

⁷ “*Baqiyah*” is a common phrase that is expressed, similar in nature to the commonly referenced term “*Allahuah Akbar*,” in which individuals in this context show support for ISIS.

13. In text communications with an FBI Online Covert Employee (hereinafter “OCE”) **WHITE** sent the OCE a screenshot of a pro-ISIS EMA channel claiming to fundraise for detained ISIS members and their dependents. The fundraising organizations, primarily run on pro-ISIS EMA channels, claimed to support ISIS member dependents, including women and children, who are detained at the Al Hol and Al Roj⁸ camps. These camps are known to be used by ISIS to obtain funds under the guise of humanitarian aid and are locations at which ISIS recruits for members. In text communications with an FBI Online Covert Employee (hereinafter “OCE”) on October 10, 2024, **WHITE** told the OCE about a “sister” in Al Hol who had a private EMA channel for ISIS propaganda that had thousands of videos dating back to “Jihad in Iraq.” According to **WHITE**, this included videos on how to make IEDs and was where **WHITE** downloaded many of his videos from.

14. **WHITE**’s Facebook timeline also shows several posts and reposts in reference to well-known ISIS supporters and scholars including Abu-Hudayfah Al-Ansari⁹, Abdul Majeed al-Hitari¹⁰, Ahmad Musa Jibril¹¹, and Anwar Awlaki¹² depicting each in a positive light. One such instance includes a post by **WHITE** that states “*Al Wala wal Bara*” and includes a video of quotes from Anwar Awlaki. This Arabic phrase literally means “loyalty and disavowal” and is commonly used by ISIS members in support of their extremist ideology towards violence.

⁸ Al-Hawl, also spelled Al-Hol, and Al-Roj are internally displaced people (IDP) camps located in Syria.

⁹ Abu-Hudayfah Al-Ansari is the recognized spokesman for ISIS.

¹⁰ Abdul Majeed al-Hitari is a Yemeni sheikh known for promoting ISIS on Facebook.

¹¹ Ahmad Musa Jibril is a Palestinian-American Islamic radical preacher who was convicted in the U.S. in relation to money laundering.

¹² Anwar Awlaki was an American-Yemeni jihadist who was killed in a 2011 while in Yemen by a U.S. Government drone strike.

15. Between at least May and August 2024 **WHITE** discussed with approximately seven different Facebook users his ability to send financial aid to them. Of those, at least five indicated they were in the Al Hol or Al Roj camps. On several occasions, **WHITE** expressed to the individuals on Facebook that the “kuffar” took down his online money transfer account and he could only support them using one specific money transfer application. He then explained that he sent money through the European Union (EU) first and then it would get to those individuals.

WHITE’S SOCIAL MEDIA INTERACTIONS DISPLAY INTENT TO JOIN ISIS

WHITE openly discussed his desire and intention to travel overseas to join ISIS with various individuals on Facebook and over EMAs:

16. Between June and August 2024, **WHITE** engaged in direct message conversations with a Facebook user (USER 1) claiming to be from Morocco. **WHITE** disclosed to USER 1 that he is from the United States, which he called the country of “kuffar”¹³ and “dar al-harb,”¹⁴ and indicated that he had plans for “hijrah”¹⁵ to “somewhere in Sahel.”¹⁶ On June 23, 2024, USER 1 asked **WHITE** if he wanted to travel to where the Islamic State is, to which **WHITE** replied, “Yes *InshaAllah*.”¹⁷ USER 1 then asked if **WHITE** had someone to facilitate his travel and **WHITE**

¹³ “Kuffar” (also spelled *kufir* or *kafir*) is an Arabic term meaning “non-believer” typically in reference to the non-belief in Allah’s teachings, however among extremist jihadists it is used to denote blasphemy, evilness, or identify non-Muslims or “infidels” in an extreme derogatory nature.

¹⁴ “Dar al-harb” is an Arabic term meaning enemy territory or house of war.

¹⁵ “Hijrah” is an Islamic term that is used to reference the Islamic Prophet Muhammad’s migration from Mecca to Medina in order to escape persecution. The term is frequently used by extremists and foreign fighters in reference to leaving their own country and traveling to a terrorist-held country to join the ranks of the militants.

¹⁶ The “Sahel” is a geographical area Africa spanning across the Sahara from the Atlantic Ocean to the Red Sea. In 2022, ISIS declared a new faction, ISIS-Sahel, which encompassed areas in the already designated FTO ISIS factions of West Africa and the Greater Sahara.

¹⁷ “InshaAllah” is an Arabic term meaning “God willing” often used to denote hope that a certain future event will come about favorably.

replied “I have.” Also, on June 23, 2024, **WHITE** disclosed to USER 1 that he met someone through an EMA who spoke with him about making *hijrah*, and that **WHITE** had told that individual that he wanted to go to an ISIS-controlled location and specifically noted “the strength is more in Africa.” He further told USER 1 that he was trying to ensure he did not do anything suspicious in order to travel safely.

17. On July 10, 2024, USER 1 informed **WHITE** about a social media application where he could find individuals to help with travel to “the brothers.”¹⁸ During that conversation, **WHITE** asked USER 1 which areas they thought had more strength, to which USER 1 replied, “Mozambique, Mali and Nigeria are also lands of *jihad*.” **WHITE** followed up by stating that he had originally wanted to go to Sinai. On July 17, 2024, while still in conversation with USER 1 about how to coordinate travel overseas, **WHITE** told USER 1, “Really I need to know some *muwahideen*¹⁹ brothers living here maybe I could meet even they some distance away.”

18. Between April and September 2024, **WHITE** engaged in direct message conversations with a Facebook user (USER 2) claiming to be a Moroccan living in Syria after making *hijrah*. On September 8, 2024, **WHITE** disclosed to USER 2 that he was planning to do *hijrah* to the *Sahel*. When USER 2 asked if **WHITE** wanted to become a *mujahid*²⁰, **WHITE** responded in the affirmative stating, “*InshaAllah*.” USER 2 asked for **WHITE**’s EMA handle shortly following a conversation about which group **WHITE** was interested in joining because USER 2 could provide more information about them, and the direct Facebook messages stopped thereafter.

¹⁸ Islamic extremists such as ISIS typically refer to members or supporters of their ideology as “brothers.”

¹⁹ An Arabic term referring to those who believe in *Tawhid*.

²⁰ A “*Mujahid*” (or *Mujahideen*) an Arabic term meaning one who commits jihad. Your affiant knows this to be used by extremists to mean fighters and those who carry out terrorist attacks.

19. On September 20, 2024, **WHITE** received a private message from a Facebook user (USER 3). Following basic greetings, USER 3 indicated he was with the “real brothers” earlier that day and followed with the pointer finger raised emoji, also known as the *Tawhid* gesture, and a black flag emoji. USER 3 then asked if **WHITE** was a supporter as well, to which **WHITE** replied, “Yes brother” followed by the pointer finger raised emoji and a black flag emoji. Shortly after, USER 3 asked if **WHITE** agreed with fighting the *kuffar*, to which **WHITE** stated he did.

A summary of this portion of the conversation is as follows:

USER 3: I was with the brothers this morning at the mosque

WHITE: MashAllah

USER 3: naam real brothers

WHITE: Yes

USER 3: 🇳🇵

WHITE: Alhumdullilah

USER 3: Do you support too?

WHITE: Yes brother 🇳🇵

USER 3: masha Allah... that's the real Islam... we must fights the kufrs

WHITE: InshaAllah

USER 3: do you agree?

WHITE: Yes brother

20. Also, while in conversation with USER 3, **WHITE** noted that he was trying to make *hijrah*. USER 3 disclosed to **WHITE** that he was in Europe with many others doing “work” successfully and expressed that “this is a holy fight... that’s why we must support” followed by a pointer finger raised emoji and a black flag emoji. **WHITE** continued to agree with USER 3’s sentiments throughout the entirety of the conversation.

21. On September 20, 2024, **WHITE** received a private message from a different Facebook user (USER 4), who referenced **WHITE** by his actual first name rather than his *kunya*. USER 4 told **WHITE** that **WHITE** could potentially be prosecuted for material support to a terrorist organization because **WHITE** had shared terrorist propaganda, and he should seek legal

advice to rectify his situation. Although **WHITE** was active on Facebook at the time of the messages and thereafter, he never responded to USER 4's message.

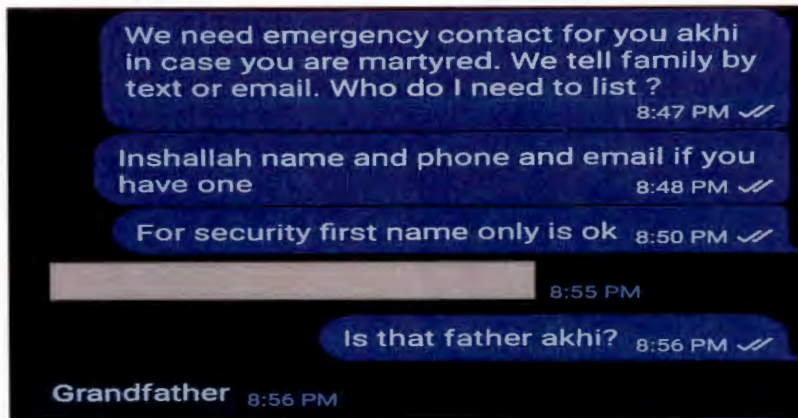
WHITE'S CONTACT WITH FBI OCE FURTHER DISPLAYS DESIRE TO JOIN ISIS

In conversations between September and October 2024 with the FBI OCE over EMAs²¹, **WHITE** expressed his interest and intent to join ISIS on numerous occasions including pledging allegiance to the leader of ISIS, discussing fighting against U.S. military members and citizens, and becoming a mujahid. For example:

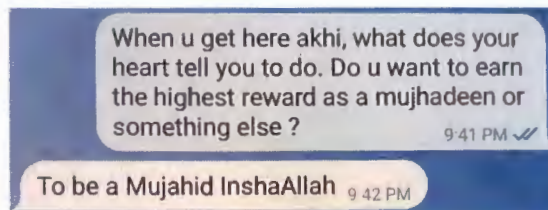
22. On September 10, 2024, the OCE contacted **WHITE** by posing as an ISIS facilitator located overseas. Based on **WHITE**'s expressed intentions elsewhere, the OCE questioned whether **WHITE** still intended to join them overseas, to which **WHITE** stated he did.

23. On September 11, 2024, **WHITE** responded to a questionnaire presented by the OCE, intended to be a purported application for joining ISIS. The OCE asked **WHITE**, "what skills do u have that will support the IS [meaning the Islamic State, an alias for ISIS]?" **WHITE** was initially non-specific but later on stated he owned guns and knew how to shoot them, take them apart, and clean them. In the same line of questions, the OCE asked **WHITE** who his emergency contact would be if **WHITE** was martyred. **WHITE** replied with his grandfather's name and phone number.

²¹ The OCE and **WHITE** messaged over various platforms throughout the course of the investigation. **WHITE**'s known usernames based on these conversations were Sulaiman Al-Amriki, Sulaiman, and Sulaiman95.



24. On September 13, 2024, **WHITE** told the OCE that he had saved enough money to travel for hijrah and that he had no obligations left at home before leaving, stating, “No family matters no debts.” The OCE asked when would he be ready to travel, to which **WHITE** responded, “I look straight at this and my heart starts pounding fast... [from] the good excitement.” The OCE asked what **WHITE**’s intentions were upon his arrival and **WHITE** stated, “To be a *Mujahid InshaAllah*.”



25. On September 18, 2024, **WHITE** sent OCE a recorded video of himself²² greeting the *Emir*.²³ Specifically, in the video **WHITE** pledged his *bayat*²⁴ to ISIS emir Abu Hafs al-

²² Based on facial comparisons between the person in the video and **WHITE**’s known DMV and passport photos, as well as surveillance during the investigation, your affiant believes the person in this video to be an accurate depiction of **WHITE**.

²³ An “*Emir*” is the Arabic term for a commander or ruler. Based on the context of the conversation, your affiant assesses this to be in reference to the Emir of ISIS.

²⁴ “*Bayat*” is an Islamic term used to indicate an oath or allegiance to a specific leader.

Hashimi al-Qurashi, expressed his desire to be in the *Dawla*²⁵ soon, indicated he was preparing for *hijrah*, and further expressed his excitement to make *hijrah*.



26. On September 14, 2024, the OCE stated, “The brothers are working on special opportunity for you to speak with Emir Soon, Does this interest you *akhi* [“my brother]?” White responded, “It very well does brother.”

27. On September 24, 2024, believing that he was going to talk to the ISIS Emir of the battalion where the OCE was supposedly located, **WHITE** told the OCE throughout the day, “I’m very excited at (sic) shy as well...,” and, “...my heart races when I think of it [smiling face emoji],” and also, “Yes big day... I’ve been thinking all night about talking with Emir... please give him *Salam*²⁶ from me and that it is a honor to speak with him,” and finally, “I can’t wait until tonight... I’m excited.”

28. That evening, a video call was initiated and an FBI confidential human source (CHS) posed as the Emir’s spokesperson so that they could speak in English. During the approximately 27-minute video call, **WHITE** was asked if he prayed *istikhara*²⁷ about making *hijrah* to join ISIS. **WHITE** responded that he did and felt as though this was for him. He also

²⁵ Your affiant assesses “*Dawla*” to be a shortened version of “*Dalwa al Islamiya*” which is another term used to mean the Islamic State / ISIS.

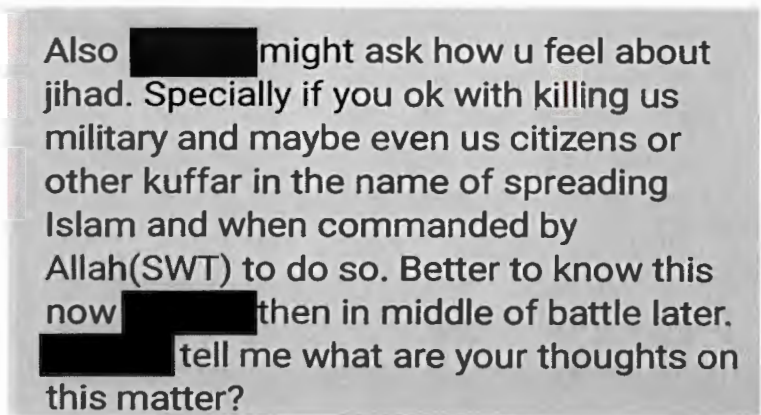
²⁶ “*Salam*” is Arabic for “peace” and is used as a general greeting within Muslim communities.

²⁷ “*Istikhara*” is a common prayer for guidance often performed before making a big decision.

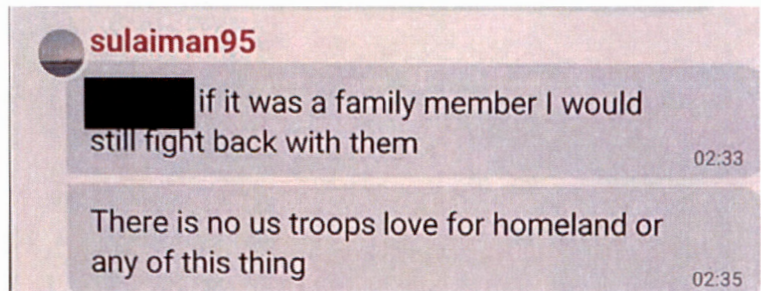
told the CHS that in the past when a lot of brothers were making *hijrah* to Syria, **WHITE** was afraid that he would be talking to the wrong people, those pretending to be *Dawla*, and get in trouble. **WHITE** stated he felt guilty for remaining here. At one point, while discussing whether **WHITE** had any firearms experience, **WHITE** noticed the CHS sitting beside a weapon and pointed out that it was an AKM 7.62 x 39 style rifle.

29. Following the call, **WHITE** told the OCE that he was glad to have had the opportunity even though he was shy and had difficulty speaking, but loved talking to the Emir's spokesperson and could not wait to meet everyone.

30. On September 24, 2024, when OCE asked if **WHITE** was ok with killing members of the U.S. Military or other U.S. citizens, **WHITE** stated, "...if it was a family member I would still fight back with them... There is no us troops love for homeland or any of this thing."



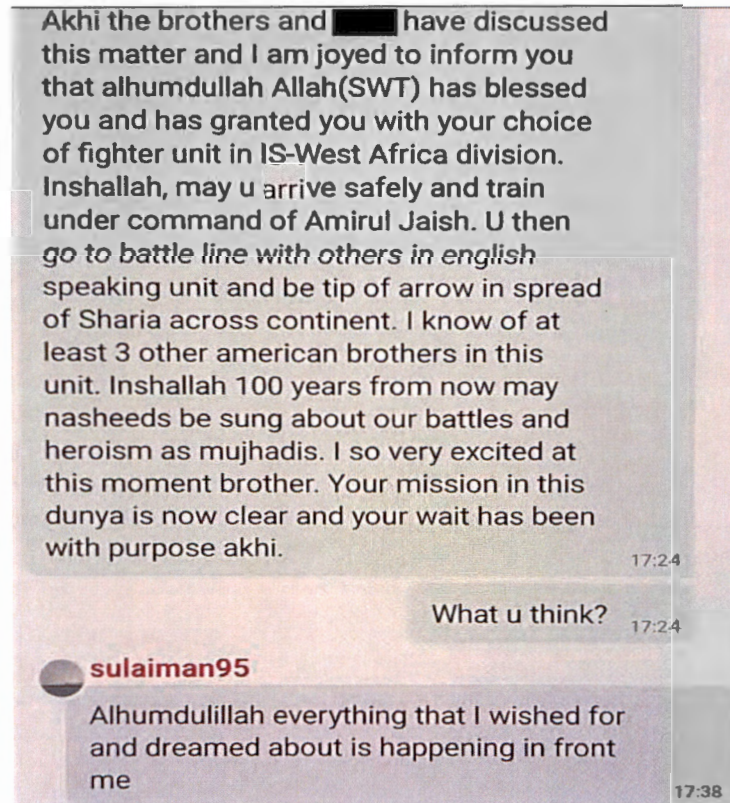
Also [REDACTED] might ask how u feel about jihad. Specially if you ok with killing us military and maybe even us citizens or other kuffar in the name of spreading Islam and when commanded by Allah(SWT) to do so. Better to know this now [REDACTED] then in middle of battle later. [REDACTED] tell me what are your thoughts on this matter?



sulaiman95
[REDACTED] if it was a family member I would still fight back with them 02:33
There is no us troops love for homeland or any of this thing 02:35

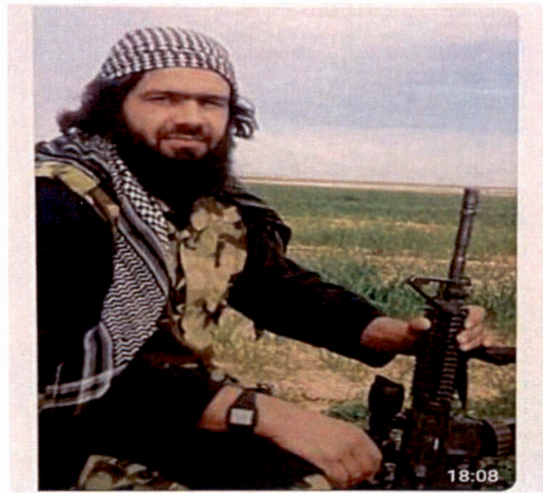
31. On September 27, 2024, in a conversation with the OCE regarding placement of arriving *mujahideen* to *Dawla*, **WHITE** was asked what his top choice of units would be given

the option of several possible units including computer operations, money matters, food work, and military/fighting. **WHITE** replied, "Military units..." The next day when **WHITE** was told that he would be assigned to the fighter unit, as was his choice, in the ISIS-West Africa division and would be on the battle line, **WHITE** replied, "*Alhumdilillah* [praise be to God] everything that I wished for and dreamed about is happening in front of me."



32. **WHITE** disclosed to the OCE that he owned guns and knew how to shoot them, take them apart, and clean them. Additionally, **WHITE** regularly sent the OCE videos depicting firefights, death, and even the adoration of children training to fight with ISIS. Further, **WHITE** would often have dreams about fighting with ISIS and would describe them to the OCE in detail saying things like, "I saw brothers who were prisoners there and men standing guard... I was then handed a weapon and we all rode in the direction of this place," and "there were so many brothers... and everyone was preparing themselves loading magazines," and also, "me and many

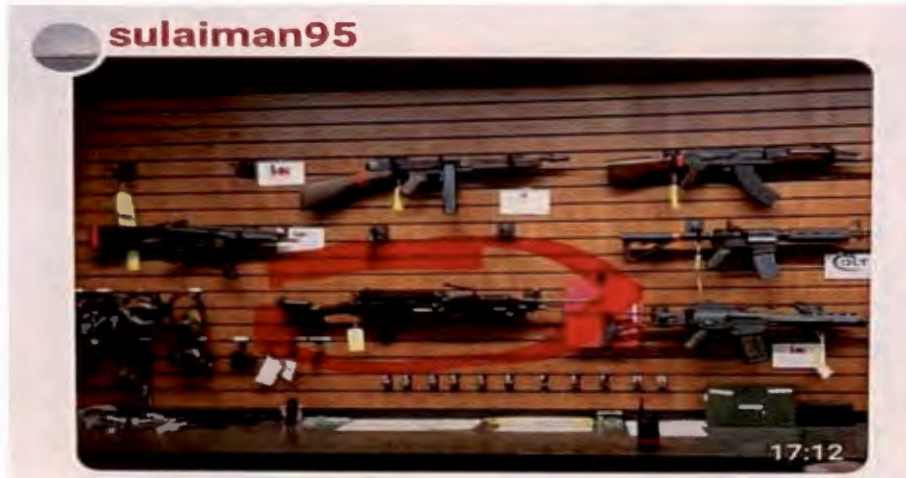
other brothers were sitting around and one brother that looked like Abu Wahib²⁸,” followed by an image of a fighter holding a rifle.



In approximately October 2024, **WHITE**'s Facebook profile picture had been changed to the photo of Abu Wahib shown above.

33. On September 28, 2024, **WHITE** told the OCE that he had not been to the range in a while and intended to go shoot that day. When asked what he planned to train with, **WHITE** sent the OCE a photo of a wall of guns with a specific one circled. He then explained that all of the guns were available to rent to shoot but if you had a special license you could purchase that one, likely referring to the automatic rifle circled in the picture. **WHITE** went on to state, “all the ones around it they make semiautomatic versions of those and technically I could buy those around it... the red labels on them means they are selective fire... or automatic in general.”

²⁸ Abu Wahib, otherwise spelled Abu Waheeb, was an Iraqi militant jihadist who served as the leader of ISIS in Iraq until he was killed in a US-led coalition airstrike in 2016. Abu Waheeb was also a former member of al-Qaeda and appeared in a number of ISIS execution videos.



34. A review of **WHITE**'s firearms-related records revealed that since 2019, **WHITE** obtained multiple weapons permits and made several purchases and sales of firearms. Specifically, **WHITE** purchased an ATI FX45 1911 pistol in February 2019, an AM-15 Optic Ready rifle in June 2019, and a Glock 19 pistol in March 2021. **WHITE** was also found to have sold a Beretta 92A1 pistol in March 2021, which he bought in January 2021, and a Riley Defense AK-47 rifle in April 2022, which he bought in November 2021.

35. Pursuant to information received during the course of the investigation, in July 2024 photos of **WHITE** training with firearms were obtained. Of the photos viewed, two pictures were identified which appeared to be **WHITE** at an indoor firing range shooting a pistol at a target. The firearm being used in the photos appears to be a firearm known to be owned by **WHITE**.

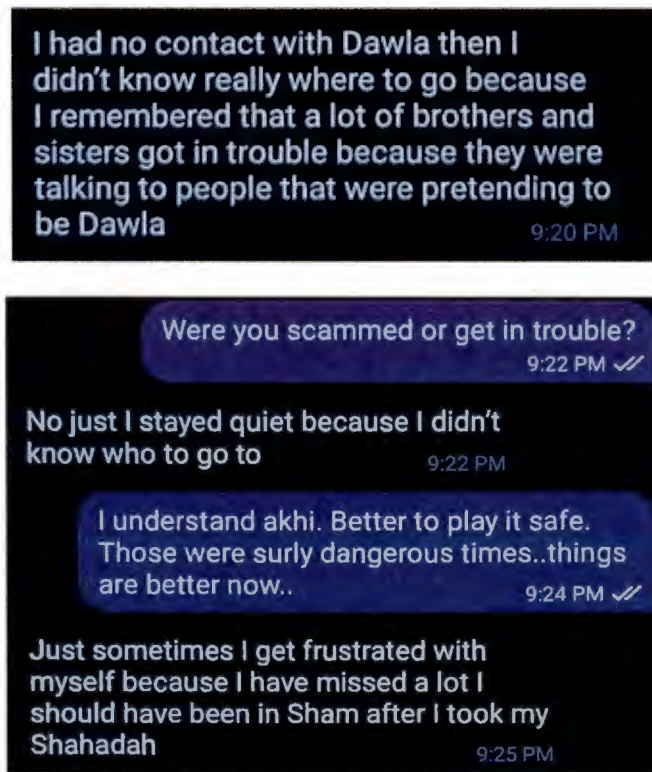


WHITE'S DESIRE TO JOIN ISIS IS NOT RECENT

WHITE expressed his frustration about missing his opportunity to join ISIS in the past on numerous occasions to various individuals. For example:

36. As previously described, **WHITE** told USER 1 in a Facebook private message that his intention in the past was to join ISIS in Sinai. Travel records between 2018 and 2024 indicate that **WHITE** traveled internationally several times, to include a trip to Egypt in 2018. On September 11, 2024, **WHITE** told the OCE that he had at one time planned to move to Egypt. He went on to tell the OCE that he wanted to join ISIS back then but did not have contact with anyone and did not know where to go, so he stayed quiet in fear of getting in trouble. **WHITE** further expressed his frustration for missing his opportunity saying, "I have missed a lot I should have

been in Sham after I took my Shahadah.” Your affiant is aware that during the time of **WHITE**’s shahada, or profession of the Muslim faith, in approximately 2015, ISIS in Syria, or Al-Sham, was heavily active in terrorist activity and fighting.



37. In May 2024, **WHITE** told a Facebook user (USER 5), from Morocco, that he supported ISIS and had wanted to make *hijrah* in the past. A summary of this portion of the conversation is as follows:

USER 5: You support dawlaa brother

WHITE: Yes

USER 5: Mashallah how long you support them

WHITE: Since for long time

USER 5: Do you thought about making hijra to sham before

WHITE: I was thinking at one point for the land of the two rivers²⁹

²⁹ “The land of two rivers” is a reference to Iraq.

38. **WHITE** went on to explain to USER 5 that it was hard to get information on ISIS in Syria but that he thought about going to Iraq or Syria previously. USER 5 told **WHITE** that the situation in Syria was not like it was in the past, to which **WHITE** expressed his understanding that the strength was now in Africa.

39. On another occasion **WHITE** discussed his current and historical intentions to join ISIS with a Facebook user (USER 6) who claimed to be from Mali and who told **WHITE** they could help facilitate his travel to Mali. On July 13, 2024, **WHITE** told USER 6 that he was a supporter of ISIS, “For a long time but over time I kept quiet because I didn’t know who to contact to guide me through *hijrah*. I was scared of mistakenly talking to people that were pretending to be *Dawla*... That is how many brothers and sisters got into trouble.” **WHITE** also disclosed to USER 6 that he had a plan to get to *Dawla* and was “in contact with the *jamaat*³⁰ in Africa” who were “coming up with plan so that I can remain safe while on *Hijrah*.”

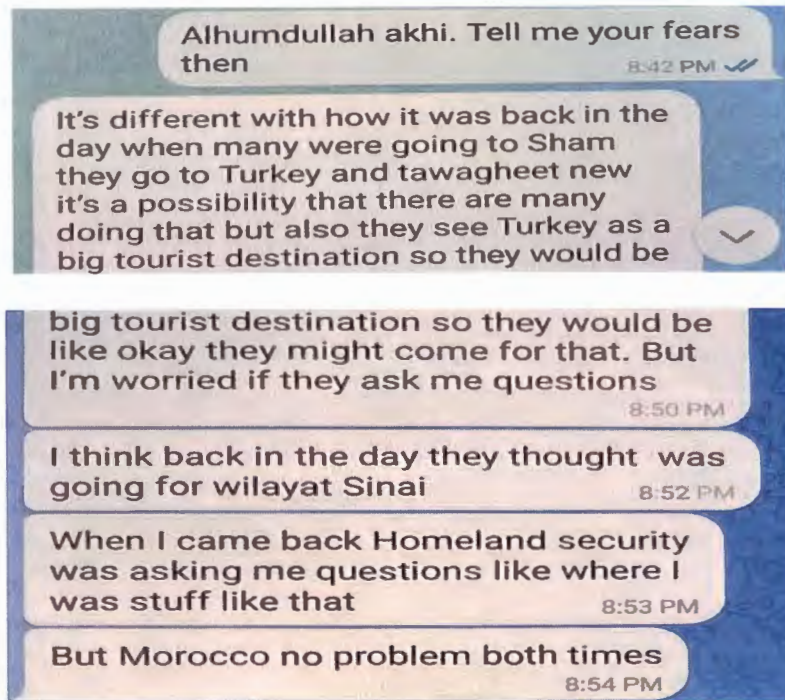
WHITE’S ONGOING CONCERNS WITH GETTING CAUGHT

40. Throughout the course of the investigation, **WHITE** constantly mentioned his concerns with traveling to join ISIS and discussed ways to obfuscate his true intentions from law enforcement and from those around him in conversations with others. Additionally, as described in more detail above, **WHITE** was aware that others “got into trouble” when they talked to people pretending to be ISIS members and who were attempting to travel to join ISIS.

41. On September 13, 2024, the OCE asked what **WHITE**’s fears were in regard to traveling for *hijrah*. **WHITE** replied that traveling now would be different than in the past when many people were traveling to join ISIS in Syria through Turkey. **WHITE** believed that Turkey was once seen as a tourist destination and therefore people traveling that route were not questioned

³⁰ “*Jamaat*” is an Arabic term meaning group.

about their travel intentions. **WHITE** then told the OCE that upon return from his trip to Egypt, he was questioned about his trip and he believed it was because the government thought he was trying to join “wilayat Sinai,” also known as the Islamic State in the Sinai Province. **WHITE** told the OCE he was worried that he would be questioned about the intentions of his trip.



42. Similarly, on the September 24, 2024, video call with the CHS, **WHITE** told the CHS that he was nervous about traveling. **WHITE** opined that when everyone was going to Sham in the past and they traveled through Turkey, the people at the airport overlooked those individuals assuming they were traveling to Turkey for tourism rather than to join ISIS. **WHITE** further expressed his concern about how people at the airport would react and what kind of questions they would ask him about where he was traveling to because now things were different.

43. On September 28, 2024, while discussing travel plans, **WHITE** asked the OCE, “How do I make it where nobody looks into that I left” and followed up by telling the OCE he was concerned that once he left people would “start looking into the matter that I’m gone and figuring

it out then questioning every person that I ever knew here.” **WHITE** then withdrew his question and told the OCE that he was just overthinking the situation.

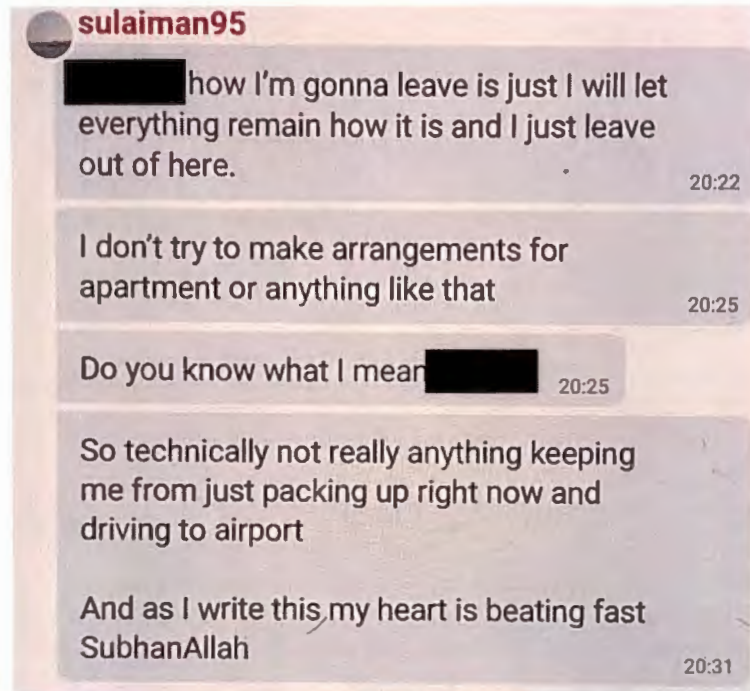
44. On October 2, 2024, again while discussing travel plans with the OCE, **WHITE** voiced his concerns about traveling through the airport and wondering if law enforcement would be aware that people were trying to make their way to ISIS from there. Specifically, **WHITE** asked, “Are the others at the airport and authorities aware that there is a big possibility that many will make their way to *Dawla* from there”.

45. On October 8, 2024, **WHITE** sent the OCE a screenshot related to an EMA’s recent change in posture regarding responses to legal orders from authorities. He followed up by asking “Honestly... do you think I’m good with everything... Should I go and deactivate right now”. After discussing whether **WHITE** should post less *jihadi* material online out of precaution, **WHITE** asked the OCE, “If they were going to try anything would they wait to intercept me at airport.” The OCE guessed that would not be the case and **WHITE** replied, “So if they were suspicious, they would have probably already come to arrest me.” Your affiant assesses the reference to “they” in this context to mean law enforcement.

WHITE MAKES PLANS TO TRAVEL TO AFRICA TO JOIN ISIS

46. Although **WHITE** frequently voiced his concern about traveling overseas to join ISIS and getting caught by law enforcement authorities, **WHITE** continued making plans to leave.

47. On September 29, 2024, the OCE asked **WHITE** when he would be ready to travel, to which he told OCE, “Maybe by early December... *InshaAllah*.” The following day, **WHITE** told the OCE that nothing was keeping him from “just packing up right now and driving to airport... And as I write this my heart is beating fast *SubhanAllah* [Glory be to Allah].”



48. On October 8, 2024, the OCE asked **WHITE** if he purchased a ticket yet, **WHITE** replied by confirming the date of intended travel and later when discussing the need to book a return flight to lower suspicions, **WHITE** stated, "... I would rather die then [sic] to go back here." **WHITE** also disclosed to the OCE that he had vacation time he could use so that his travel would not look suspicious.

49. On October 16, 2024, **WHITE** sent OCE a screenshot of a travel itinerary showing a flight departing from Raleigh-Durham, International Airport (RDU) on December 4, 2024 to Rabat, Morocco. **WHITE** told the OCE that "a lot of things [are] happening... *Alhumdulillah*" followed by the pointer finger raised emoji, depicting the *tawhid* gesture that ISIS militants typically pose with and use.

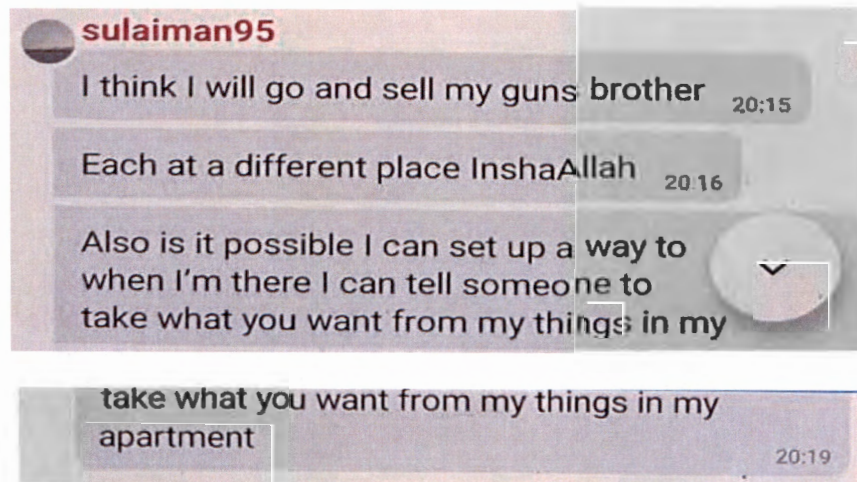


50. Investigatory review of airline records confirmed that flights had been booked by **WHITE** for departure from RDU on December 4, 2024 at 6:20pm on Delta flight DL 8417, traveling to Charles de Gaulle Airport in Paris, France, and then continuing to Rabat, Morocco on Delta flight DL 8695. Return flights were booked departing Rabat, Morocco on December 18, 2024, traveling to Charles de Gaulle Airport in Paris, France, and then continuing on to RDU. The records also indicated that the flights were booked through a third-party travel agency and that the fare was \$681.31 which **WHITE** paid for using his known debit card. Based on **WHITE**'s discussion with the OCE, and as is common for those seeking to join an FTO, your affiant assesses that **WHITE** purchased round-trip airfare to avoid arousing suspicion by law enforcement.

ADDITIONAL PREPARATIONS MADE BY WHITE

51. In other conversations in September and October 2024, **WHITE** and the OCE discussed additional preparations for travel. Among the topics of discussion were **WHITE**'s considerations about what to do with his personal belongings as well as any necessary equipment for personal use while overseas.

52. On October 11, 2024, **WHITE** told the OCE, "I think I will go and sell my guns... Each at a different place *InshaAllah*." He further expressed that he thought he could sell his, "1911 probably around 200 and the Glock 19 probably 350... Or maybe even 400." During that same conversation, **WHITE** asked the OCE about setting up a way to dispose of the remaining items in his apartment after he is already gone.



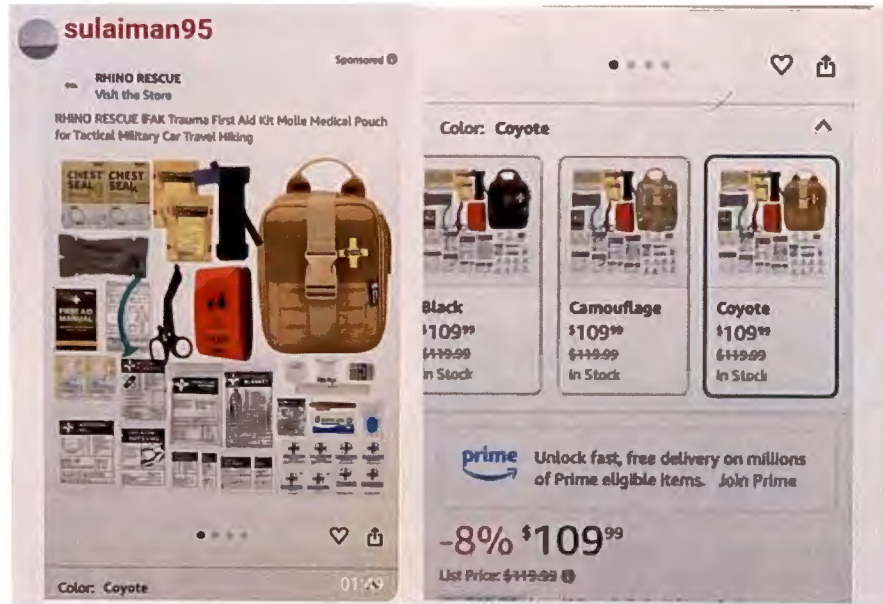
53. **WHITE** additionally sought advice about good boots to purchase. **WHITE** initially stated he could not make up his mind on boots and would likely go somewhere in person to get a good fit however, **WHITE** later informed the OCE that he went with the boots he initially found online and that the, "Boots and kit should be here by tomorrow *InshaAllah*." On October 14, 2024, **WHITE** sent the OCE a screenshot of the following pair of military style boots stating these were the boots he purchased:



54. Amazon purchase history confirmed that **WHITE** in fact bought the aforementioned boots and following a conversation between **WHITE** and the OCE about breaking in the boots to avoid raising suspicion at the airport with new boots, surveillance photos captured **WHITE** wearing the new boots as of October 23, 2024.



55. The OCE and **WHITE** also discussed the need for a personal combat medical kit for **WHITE**'s use upon joining up with ISIS. On October 1, 2024, **WHITE** sent the OCE screenshots of potential trauma kits:

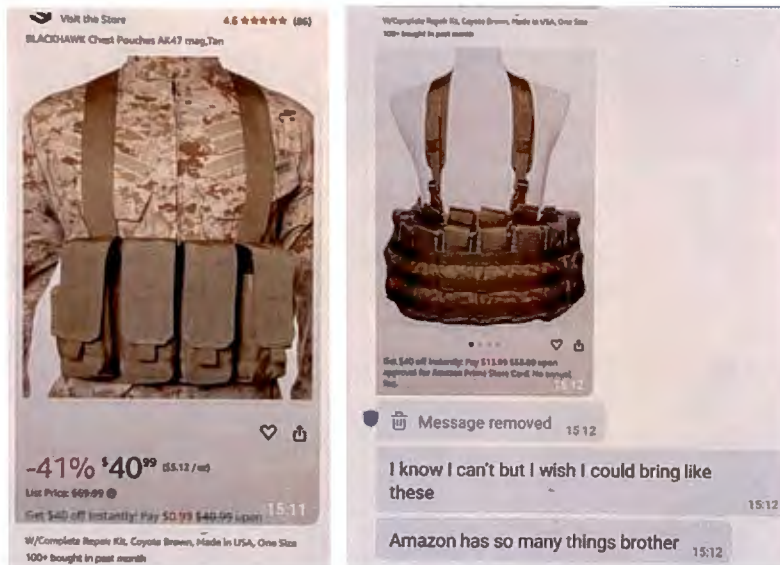


56. On October 17, 2024, **WHITE** informed the OCE that he received his kit. He went on to tell the OCE he was concerned about the scissors in the kit and even if he packed them in his checked bag, which would be allowed, he wanted to eliminate “all possibilities for them to look into me gone.” When the OCE asked about the contents of the kit **WHITE** purchased, **WHITE** provided the following screenshot and Amazon purchase history confirmed that **WHITE** had subsequently purchased it.



57. **WHITE** also told OCE that he needed to find a new luggage set. On October 14, 2024, **WHITE** sent the OCE an image of a duffel bag from Amazon and asked if that was a good one. Upon seeing the image, OCE said, “*Alhumdullah* look good brother. But what we are doing u won’t need dress shoes [two laughing emojis and black flag emoji], to which **WHITE** replied, “[two laughing emojis] ... You really gave me smile today...”

58. The same day, **WHITE** sent the OCE two screenshots from Amazon of military style chest rigs with attached pouches for AK-47 magazines. He told the OCE, “I know I can’t but wish I could bring like these... Amazon has so many things...”



WHITE’S ATTEMPT TO TRAVEL TO JOIN ISIS

59. On December 4, 2024, at approximately 3:30 PM, **WHITE** was observed entering his known vehicle with 3 bags enroute to RDU Airport. At approximately 4:45 PM, FBI Agents observed **WHITE** check in for flight DL 8417 bound for Paris, France, and then proceed through the security checkpoint. Upon clearing the gate and attempting to make his way to board the plane, **WHITE** was arrested at approximately 7:50 PM.

CONCLUSION

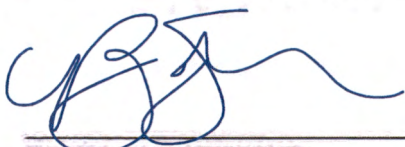
60. **WHITE's** many online conversations with various persons, as well as his communications with the CHS and the OCE, display a longstanding intent and desire to join ISIS which he prepared for and attempted on December 4, 2024. He expressly acknowledged awareness of ISIS as a designated FTO and repeatedly expressed concern over being caught by law enforcement and the efforts he was taking to avoid capture. Based on the foregoing facts, your affiant submits that there is sufficient probable cause to believe that Alexander Justin **WHITE** attempted to commit a federal offense under Title 18, United States Code, Section 2339B, by conspiring to provide and attempting to provide material support and resources to ISIS, a designated foreign terrorist organization.

Respectfully submitted,



Monika Van Hooser
Special Agent
FBI

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit via reliable electronic means, telephone, on this 4th day of December, 2024 at 9:45 pm.



BRIAN S. MEYERS
UNITED STATES MAGISTRATE JUDGE