
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Jessica S. Allen
v. : Mag. No. 22-8385
OMAR ALKATTOUL : **CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

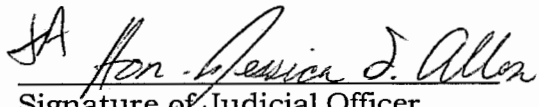


Jamie Aiello
Special Agent
Federal Bureau of Investigation

Special Agent Aiello attested to this affidavit by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A).

11/9/22 at Newark, New Jersey
Date City and State

HON. JESSICA S. ALLEN
United States Magistrate Judge
Name and Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A

(Transmitting Threat in Interstate and Foreign Commerce)

On or about November 1, 2022, in the District of New Jersey and elsewhere, defendant

OMAR ALKATTOUL,

knowingly transmitted in interstate and foreign commerce communications containing a threat to injure the persons of another.

In violation of Title 18, United States Code, Section 875(c).

ATTACHMENT B

I, Jamie Aiello, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based upon briefings with other law enforcement officers. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have only set forth facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part. Dates of events are asserted as having occurred on or about the asserted date.

1. As discussed in more detail below, on or about November 4, 2022, law enforcement conducted a consensual search of an iPhone belonging to Defendant OMAR ALKATTOUL ("ALKATTOUL"). The search revealed that on or about November 1, 2022, ALKATTOUL used a social media application ("Application-1") to communicate with another user of Application-1 ("Individual-1"). During the conversation between ALKATTOUL and Individual-1, ALKATTOUL referred to a document that ALKATTOUL had been writing. ALKATTOUL told Individual-1, "I actually started writing it a long time ago. If you want I will link it. It's in the context of an attack on Jews." Shortly thereafter, ALKATTOUL sent a link to a document entitled "When Swords Collide" (the "Document"). In an interview with law enforcement on or about November 4, 2022, ALKATTOUL admitted that he had drafted the Document and sent it to Individual-1. ALKATTOUL further stated that he believed Individual-1 wanted to read the Document.

2. On or about November 5, 2022, a second individual ("Individual-2"), who communicated with ALKATTOUL on a social media application ("Application-2"), informed law enforcement that he/she communicated with ALKATTOUL in a server on Application-2.¹ According to Individual-2, ALKATTOUL shared a link to the Document in the server with four individuals in addition to Individual-2. Individual-2 stated that he viewed the Document. Individual-2 also stated that the server may have had 20 members at one point, and when ALKATTOUL mentioned the Document, other users commented "good job" or "proud of you." Individual-2 stated that he/she communicated with ALKATTOUL via Application-2 as well as other social media applications. According to Individual-2, ALKATTOUL told Individual-2 that he wanted to kill in an "act of revenge" for the death of Muslims. In or around early October 2022, Individual-2 asked ALKATTOUL about his plan for an attack. ALKATTOUL claimed that he no longer wanted to do it. On or about October 5, 2022, ALKATTOUL used a different social media application

¹ Based on my training and experience, I am aware that Application-2 allows users to create "servers" and "channels" through which users can communicate with groups of other users.

to send Individual-2 an audio recording of ALKATTOUL speaking in Arabic. The recording has been translated into English as follows:

With God's permission, we will conquer Andalusia, O French! And we will conquer Jerusalem, O Jews. With God's permission, he will slaughter you, O swine and monkeys, God damn you. And I pledge allegiance to Abu-Hasan al-Hashimi al-Qurayshi,[²] may God protect him; and I will obey him during hard times and good times. With God's permission, the Jews will be frightened; the promise is near.

3. On or about November 4, 2022, law enforcement reviewed a copy of the Document on ALKATTOUL's iPhone pursuant to a consensual search. In a section of the Document titled "Introduction," ALKATTOUL stated, among other things, the following:

All praise is due to Allah SWT,[³] I am the attacker and I would like to introduce myself. . . I am a Muslim with so many regrets but I can assure you this attack is not one of them and Insha'Allah[⁴] many more attacks like these against the enemy of Allah and the pigs and monkeys will come.

4. In a section of the Document titled "The target," ALKATTOUL stated, among other things, the following:

I will discuss my motives in a bit but ***I did target a synagogue for a really good reason according to myself and a lot of Muslims who have a brain.*** Let's be aware of the fact that the Jews promote the biggest hatred against Muslimeen even in the west. The Jews are in fact a very powerful group in the west which is why western countries today shill for them on

² Based on my training and experience, al-Khurayshi refers to Abu al-Hasan al-Hashimi al-Quarashi, who is the third and current caliph of the Islamic State (ISIS).

³ "SWT" refers to "Subhanahu wa ta'ala," which translates generally from Arabic as "Glory to Him, the Exalted."

⁴ "Insha'Allah" translates generally from Arabic as "if Allah (God) wills" or "God willing."

top of the murtadeen^[5] in Saudi Arabia and every Arab country.

(Emphasis added).

5. In a section of the Document titled “The motive of the attack,” ALKATTOUL stated, among other things, the following:

This attack was just to remind the Jews that as long as 1 Muslim remains in this world they will never live a pleasant life until the Muslims in Palestine, Syria, West Africa, and South Asia are living a pleasant life. The Jews support terror against the muslimen and always have So the motive of this attack is hatred towards Jews and their heinous acts and I don’t want anyone to tell me for a second that “not all Jews support terror against Muslims” yes they do! They have since day one. Their Torah justifies their acts and let’s keep in mind it was a Jew that tried to kill the nebi SAW.^[6]

(Emphasis added).

6. Other sections of the Document contained the following titles:

- “Why hatred towards Jews is a good thing even if they’re not Zionists”
- “The right-wing ideology of the Jews”
- “The term ‘anti-Semitic’ and it’s true meaning”
- “The ‘Holocaust’”
- “The ‘good’ Jews,” in which ALKATTOUL states, “Good jews do not exist unless if they convert to Islam. . . . I hate jews based on their actions and their religion that justifies the actions they do.”

7. In a section of the Document titled “The Heroes,” ALKATTOUL stated, among other things:

. . . when I say “heroes and lions” I am referring to Osama Bin Laden, Abu Musab al-Zarqawi, Abu Bakr

⁵ “Murtadeen” translates generally from Arabic as “apostate,” which is one who renounces religious or political beliefs or principals.

⁶ Referencing Muhammad, believed to be the last Prophet and Messenger of God.

al-baghdadi, Abu Muhammad al-Adani, Anwar al-Awlaki, Abu Omar al-Shishan, Mullah Omar and Abdullah Azzam^[7] . . . and of course the lone wolf muwahideen^[8] who have made the kuffar^[9] shook.

8. In a section of the Document titled “Religion of peace,” ALKATTOUL stated, among other things, “. . . I as a Muslim and disbeliever in the taghut,^[10] I support terrorism against the kuffar and the enemies of the deen.”¹¹

9. The Document also has a section titled, “A Small Few Questions for Omar, Pt 1.” One of the questions and corresponding answer is as follows:

Q: Why have you chosen to carry this attack on behalf of ISIS?

A: It’s not “ISIS” it is the “Islamic State”. I chose to do it on behalf of them because they’re legitimate mujahideen^[12] unlike modern day al-Qaeda and Taliban.

10. On or about November 3, 2022, law enforcement agents interviewed ALKATTOUL at his residence. ALKATTOUL made the following statements, in substance and in part:

a. ALKATTOUL was “radicalized” over the course of approximately one year after viewing posts on Application-2 that contained screenshots of a video showing Kahane-ists laughing and sharing photos of dead Arab children and praising the people

⁷ All various leaders and/or spokespersons for al-Qaeda, The Taliban and/or ISIS.

⁸ “Muwahideen” translates generally from Arabic as “monotheist.”

⁹ “Kuffar” translates generally from Arabic as “unbeliever/non-Muslim/infidel.”

¹⁰ “Taghut” is a term that is specifically used to denounce everything that is worshiped instead of Allah. It is often used in reference to an oppressive government.

¹¹ “Deen” translates generally from Arabic as the religion or belief of a Muslim.

¹² “Mujahideen” translates generally from Arabic as guerrilla fighters in Islamic countries, especially those who are fighting against non-Muslim forces.

who killed them.¹³ ALKATTOUL also stated that he used an encrypted social media application (“Application-3”) to view ISIS propaganda, and to communicate with others who were encouraging him to carry out an attack. Specifically, ALKATTOUL stated that he had communicated with an individual (“Individual-3”), who ALKATTOUL believed was affiliated with al-Qaeda and located in Pakistan, and an individual in Germany (“Individual-4”), who introduced ALKATTOUL to Individual-3.

b. Individual-3 provided ALKATTOUL with documents and information on how to protect his iPhone and phone applications from being detected by law enforcement. ALKATTOUL stated that, based on the information provided, he had taken steps to conceal his iPhone communications and data, including changing his web search engine.

c. ALKATTOUL communicated to Individual-3 that he (ALKATTOUL) could conduct an attack on Jewish or gay people, but claimed that he did not have adequate resources to do so. Specifically, ALKATTOUL stated that he told Individual-3 that he (ALKATTOUL) could attack synagogues or gay clubs. ALKATTOUL told law enforcement that he considered an attack on a synagogue in New York but would need two years to prepare for such an attack. ALKATTOUL said that he researched how to obtain a gun, shooting ranges, and mass shootings. He also said that if he were to conduct an attack, it would be a shooting attack. He said he would not feel bad for the victims but would feel bad for the families of the victims. ALKATTOUL claimed that as of October 29, 2022, he was about “50/50” on whether or not he would commit an attack.

d. ALKATTOUL described a terrorist as someone who killed or hurt people. He claimed that he was not a terrorist, but admitted that he had previously posted in Application-3 that God cursed the Jewish people and God should burn gay people. He told law enforcement that in September 2022, he posted in a group chat in Application-3 that he would punch in the face or curb stomp the next “f****t” he saw. He claimed that the group chat consisted of individuals who were “LARP-ing” as terrorist/jihadis. He explained that “LARP-ing” was live-action role playing.

¹³ Based on my training and experience, “Kahane-ists” were followers of Meir Kahane, who, according to ALKATTOUL, believed that Jewish people were superior to others. He also told law enforcement that if he found where the Kahane-ist headquarters was located, he would burn it to the ground, but then claimed that he “didn’t have the balls” to do that.

e. ALKATTOUL also admitted that he posted on Application-3 that he would throw a Molotov cocktail on a Jewish person, but claimed that it was in a joking manner. He also claimed he would not actually do it because he did not want to disappoint his family. He further claimed that he did not “have the balls” to commit such an act, especially after “this visit” from the FBI. ALKATTOUL additionally claimed that he did not want to serve a prison term, get shot, or die.

f. ALKATTOUL admitted that he had seen information about making bombs posted in the Application-3 group chat, but he had never personally looked into making a bomb or posted information about bombmaking. He admitted that on or about October 23, 2022, he posted a statement in Application-3 saying that he wanted to throw a bomb on Hizballah because they were Shia, and he did not like Shiites because of their beliefs. He then claimed, “but let’s be honest, I’m not man enough to act on any of this.”

g. ALKATTOUL also stated that he would not give money to individuals who wanted to commit an act of violence. He admitted that he had hostility but would not be violent himself. He claimed that if he heard about someone wanting to do something violent, he would tell them not to do it because he would feel bad if they got arrested or killed. ALKATTOUL said, however, that he would not feel bad for the victims of violence.

h. ALKATTOUL claimed that he would not actually commit the acts of violence about which he posted on Application-3.

i. In response to law enforcement’s question as to whether ALKATTOUL planned to conduct an attack, ALKATTOUL responded that it was a “possibility” and that he wanted to get to that point as quickly as possible, but then claimed that he did not really want to conduct an attack as soon as possible.

11. On or about November 4, 2022, law enforcement conducted another interview of ALKATTOUL. During that interview, ALKATTOUL made the following statements, in substance and in part:

a. ALKATTOUL admitted that he created the Document, but claimed that this was done while LARP-ing. ALKATTOUL stated that he wrote the Document in five days. He claimed that he imagined being al-Qaeda and carrying out an attack. He further claimed that he wrote the Document in the first person in the

context of being a leader.

b. When ALKATTOUL was asked if he would carry out an attack if he had his own money and did not live with his parents, he claimed that he would not. When asked if the Document was real or fake, he replied that part of it was real, but he then claimed that it was fake.

12. During both interviews, ALKATTOUL gave consent to law enforcement to search several electronic devices, including an iPhone.

13. The consensual search, as well as the search of ALKATTOUL's iPhone pursuant to a court-authorized search warrant, revealed the following:

a. Between on or about August 4, 2022 and on or about August 21, 2022, ALKATTOUL exchanged a series of private messages over Application-3 with another user of Application-3 ("Individual-5"). ALKATTOUL stated, ". . . I know my target but idk [I don't know] the location." In response to Individual-5's question, "U planning an attack?", ALKATTOUL responded, "Yes." ALKATTOUL further told Individual-5 that the attack would not happen for about six to seven years because he needed to plan it and gather resources. He stated, "Well you see I want this attack to be affiliated with AQ [al-Qaeda]." ALKATTOUL added that he would later specify "this attack and the motive," and that the attack was in retaliation for the New Zealand mosque shootings in Christchurch on March 15, 2019. He noted that the attack would involve bombings, shootings, and "maybe" beheadings.

b. On or about August 29, 2022, ALKATTOUL sent a private message on Application-3 to Individual-2, stating, "As a Muslim I support Dylann Roof¹⁴ because he went in a n****r Christian Janiya type church and killed 10 Christcucks while being an atheist, a lot Muslims in the west should learn from him."

c. On or about August 30, 2022, ALKATTOUL sent a private message on Application-3 to another user of Application-3 ("Individual-6"). The message contained a video and photo montage of Dylann Roof. In response, Individual-6 stated, "[M]e in [S]hia mosque." ALKATTOUL then responded, "Me in church and synagogue."

¹⁴ Dylann Roof is an American white supremacist Neo-Nazi convicted for hate crimes for the shooting murders of nine people in a South Carolina church on June 17, 2015.

- d. On or about October 4, 2022, ALKATTOUL searched for an Arabic-English translation of “[b]y God, I will slaughter you, O Jews.”
- e. On or about October 16, 2022, ALKATTOUL searched the Internet for “beslan school seige,” which referred to a terrorist attack on a school in Beslan, Russia in 2004, in which 333 people were killed, including 186 children.
- f. On or about October 20, 2022, ALKATTOUL searched for a foreign language translation of “I hate Jews, and I love the Islamic state.”
- g. On or about October 21, 2022, among other things, ALKATTOUL’s web history revealed the following: “aq [al-Qaeda] attack on jewish school france.”
- h. On or about October 27, 2022, ALKATTOUL received a message on an encrypted messaging application (“Application-4”) from Individual-3, who was also using Application-4. The message stated, “brothers told me u will @ttck in US.” On or about October 29, 2022, ALKATTOUL responded: “Yeah so basically about 2 months ago I told [Individual-4] and [another individual (“Individual-7”)] that I was planning an attack but it’s gonna take me years to prepare for it because I don’t have items and my parents do not like guns. I said I could be targeting a synagogue or gay night club. And this would be AQ [al-Qaeda] affiliated attack.” ALKATTOUL also stated to Individual-3, “. . . I’ve been thinking about jihad for a while now and I just came to this conclusion of how and where. . . . And I am taking a class in college next year that teaches how to hack and how to go on the dark web and I feel like that would be useful and somewhat relevant in going on jihad.” ALKATTOUL also stated, “[Individual-7] sent me inspire¹⁵ pdf magazines.”

¹⁵ Based on my training and experience, “Inspire” is an English language online magazine published by al-Qaeda. The magazine is one of the many ways that al-Qaeda uses the Internet to reach its audience.

i. On or about October 29, 2022, ALKATTOUL sent a message via Application-3 to Individual-2, who also had an account with Application-3: “I got messaged by AQ [al-Qaeda]. . . . I’m try[ing] [to] explain to the guy that I can’t go and attack but he’s urging me to . . . TTP¹⁶ recruitment.” ALKATTOUL also sent Individual-2 a screen capture of the conversation with Individual-3 referenced above in paragraph 13.h.

14. After the interview with law enforcement, while voluntarily in an ambulance during transport to the hospital for an examination, ALKATTOUL told the ambulance personnel that he supported ISIS and al-Qaeda.

15. Upon arrival at the hospital, ALKATTOUL told a hospital employee (“Employee-1”) during the intake process that ALKATTOUL identified with the ideologies of ISIS and al-Qaeda. He also told Employee-1 that he had been communicating on social media with someone he believed to be in al-Qaeda. ALKATTOUL additionally stated that he told the person he believed to be in al-Qaeda that he (ALKATTOUL) had plans to blow up a synagogue but did not know if it was going to be in a day, a week, or year.

16. ALKATTOUL further told Employee-1 that although some things he said on social media were a joke, one thing that was not a joke was his wanting to plan an attack on a synagogue.

¹⁶ Based on my training and experience, “TTP” is believed to reference “Tehrik-e Taliban Pakistan,” which is a group of militant Taliban networks formed to oppose the Pakistani military.