

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELVIN HUNTER BGORN WILLIAMS,

Defendant.

NO. CR21-099 JCC

GOVERNMENT’S SENTENCING
MEMORANDUM

I. Introduction.

For years, members of the community flagged Elvin Williams to the FBI as someone who was at high-risk of committing a violent terrorist act in the name of ISIS. The community members who contacted the FBI had no axe to grind with Williams. They were the very people acting as his support system – high school administrators, leaders of the mosque Williams attended, and his own mother. They all repeatedly saw the warning signs and felt compelled to report their concerns to the FBI.

This started in 2017 when Williams was 17 years old. Administrators at his high school reported his disturbing behavior to the FBI, followed close in time by his mother. The FBI acted responsibly and with restraint. Agents met with Williams’ mother, who requested that they speak with him directly. They did, and Williams essentially told them what they wanted to hear – that although he had been expressing support for ISIS and

1 saying that he wanted to travel to Syria to fight for ISIS, he “no longer felt that way.” The
2 FBI did not pursue a formal investigation at that time.

3 But over the next couple of years, Williams’ mother and the leaders of the mosque
4 continued to express their concerns that Williams’ radicalization was escalating, and that
5 he was preparing to join ISIS abroad, conduct a violent attack closer to home, or both.

6 In November 2020, the FBI opened an investigation. Agents reviewed Williams’
7 online activities and interviewed his family members and associates. It quickly became
8 clear that Williams was a danger to be taken seriously. He had already pledged an oath of
9 *bayat* (allegiance) to the leader of ISIS. He had been telling others that he wanted to
10 travel overseas, join ISIS, and wage violent jihad on behalf of ISIS. And he repeatedly
11 stated that if he was unable to travel abroad, he planned to commit a local attack in the
12 name of ISIS.

13 In February 2021, after assessing the significant degree of Williams’
14 radicalization, the FBI’s investigation shifted into a more proactive mode, using
15 Confidential Human Sources (CHS’s). Williams began communicating over an encrypted
16 messaging app with two CHSs portraying themselves to be ISIS recruiters who would
17 approve and facilitate his travel to fight with ISIS. Through these purported ISIS
18 recruiters, Williams tendered a putative application to ISIS listing his reason for travel as
19 “jihad.” The “recruiters” ultimately told Williams that his application had been approved,
20 and Williams requested to travel to the Sinai desert to fight with ISIS. The “recruiters”
21 told Williams that his travel would receive final authorization after he obtained a passport
22 and purchased an airline ticket.

23 During the spring of 2021, Williams applied for a passport and got a job to earn
24 money for his anticipated travel. He used all his earnings to buy military supplies and a
25 plane ticket, even though he was practically destitute. Williams also recruited another
26 Seattle area associate to travel with him; unbeknownst to Williams, this associate recently
27 had become another CHS. The day Williams received his passport, he contacted the ISIS
recruiters and purchased a plane ticket from Seattle to Cairo, Egypt, departing on
May 28, 2021. Williams was arrested attempting to board that flight.

1 Williams pled guilty to Providing Material Support to ISIS, but he now wants this
2 Court to believe that the FBI entrapped him using the CHS's and that he did not engage
3 in the offense conduct volitionally or with any clear thinking. Williams claims that his
4 mental health issues caused him to be susceptible to manipulation by the CHS's; "none of
5 this would have happened" but for the CHS's; and his mental state made it impossible for
6 him to form the specific intent required under the Terrorism Enhancement. The Court
7 should reject these claims. The facts show that Williams already had set down the path of
8 supporting ISIS through violence long before the CHS's became involved in the
9 investigation. And even thereafter, his conduct consistently was volitional, calculated,
10 willful, and directed.

11 For the reasons set forth herein, the government recommends a sentence of
12 imprisonment of **180 months** and a term of supervised release of 15 years, with all the
13 conditions of supervised release recommended by the Probation Office.

14 **II. Williams' Offense Conduct.**

15 **A. Williams' Activities Prior to the Introduction of the CHS's.**

16 The FBI's investigation of Williams began in November 2020 but remained
17 relatively passive until February 2021, when the CHS's became involved. A review of
18 Williams' activities prior to that time makes clear that he had already chosen the path of
19 supporting ISIS through violence and had been reaching out to others for assistance in
20 connecting with ISIS leaders abroad.

21 **1. Community Members Repeatedly Contact the FBI About Williams.**

22 Williams first came to the attention of the FBI in October 2017, when he caused
23 concern among administrators at his high school. Williams told others at school that he
24 wanted to join ISIS and claimed that the 2017 ISIS attack at a music concert in
25 Manchester, during which numerous people were killed and injured, was justified
26 because the performer dressed provocatively. C. 4.¹

27

1 The Complaint (Dkt. 1) is attached as Exhibit 1 and will be cited as C. __," referring to the page numbers. Most of the same facts are also contained in the Presentence Report.

1 FBI Special Agents met with Williams' mother in November 2017. She reported
2 that Williams told her he wanted to move abroad to fight for ISIS. She also stated that
3 Williams had been kicked off social media for terms of service violations related to pro-
4 ISIS posts. As a result, she terminated internet service at her home to prevent him from
5 accessing ISIS propaganda. C. 4.

6 Later that day, at his mother's request, agents spoke with Williams. He admitted
7 that he had been interested in fighting for ISIS and had reached out over social media
8 asking others for assistance in contacting ISIS but got no response. He also visited a
9 mosque in Tukwila to meet with someone whom he thought could connect him with ISIS.
10 However, Williams told the agents that he had changed his mind and no longer felt like
11 joining ISIS, and realized it was wrong. He disavowed his support of ISIS. The FBI did
12 not open an investigation into Williams at that time.

13 A few weeks later, in January 2018, Williams' mother contacted the FBI again to
14 express concern over Williams' state of mind. She told the FBI that Williams' mentor at
15 the mosque caught him watching terrorist videos. Williams also tore-up his classroom at
16 school and told school administrators that as soon as he turned 18, he would travel to Iraq
17 to "be with his people." Williams' mother said she did not think, at that time, he was an
18 imminent threat to harm himself or others.

19 In November 2020, a concerned citizen approached the FBI on behalf of the
20 Seattle area mosque that Williams attended. The mosque had been supporting Williams
21 during the past year – encouraging Williams to de-radicalize, assisting him with a place
22 to live, with food, and with tuition for a semester of college. Members of the mosque also
23 provided Williams with a cell phone and a laptop computer to use for a job search. The
24 mosque members made clear to Williams that he was required to abandon ISIS if he
25 accepted their help. C. 4.

26 When the concerned citizen observed Williams using the phone to view ISIS
27 videos and engage in online chats with other radical individuals, he took the phone away.
Members of the mosque reviewed the phone and were disturbed to find numerous ISIS-
related videos that depicted scenes of graphic violence (including summary executions

1 and beheadings by ISIS militants); other ISIS military propaganda; and a video on how to
2 manufacture explosives, which Williams appeared to have distributed to others. The
3 concerned citizen told the FBI that, in response to these developments, the mosque
4 terminated its efforts to support Williams. C. 4-5.

5 **2. The FBI Opens its Investigation.**

6 The FBI opened an investigation in November 2020 to assess the extent of
7 Williams' radicalization. The initial phase of the investigation involved several
8 interviews and a review of Williams' online activities. This confirmed that Williams was
9 an increasingly radical and volatile individual who appeared to be determined to support
10 ISIS through acts of violence.

11 **i. The FBI Interviews Williams and Those who Know Him Well.**

12 FBI agents interviewed Williams' mother on several occasions during late 2020
13 and early 2021. She said that Williams now referred to ISIS as "our people" and that he
14 was becoming more radical each day; he had recently begun talking about plans to move
15 abroad to "become a terrorist for real"; and he said that "everyone is waiting" and soon
16 there would be a terrorist attack. Williams claimed to be waiting for approval to carry out
17 an attack and described a chain of command within ISIS that approves such attacks. The
18 mother also stated that Williams was obsessed with weapons and talked about explosives
19 and chemicals. She further said that members of the mosque contacted her because they
20 were worried that Williams would be "a terrorist and do an attack one day." C. 5.

21 FBI agents also interviewed a roommate who lived with Williams during
22 October 2020. The roommate described Williams as "radical" and referred to him as a
23 "terrorist." According to the roommate, Williams told him that he wanted to join ISIS and
24 openly discussed his affinity for ISIS. The roommate regularly saw Williams
25 participating in ISIS-related online chatrooms. C. 6.

26 FBI agents interviewed Williams on several occasions during late 2020. Williams
27 admitted that he regularly made pro-ISIS postings on social media platforms. He said he
no longer attended a mosque because he was "too extreme" for the mosques. Williams
also said he felt isolated, lonely, and wanted to "find a wife." Williams stated that he had

1 | been “off of [his] medications” for about a year and admitted to having suicidal thoughts,
2 | but claimed to have no present intention of hurting himself or others. C. 6.

3 | **ii. Williams’ Online Communications About ISIS.**

4 | A review of Williams’ online communications confirmed that he was deeply
5 | obsessed with ISIS and vowed to support the terrorist group through acts of violence.

6 | By November 2020, Williams had posted an online video of himself pledging a
7 | formal oath of allegiance (*bayat*) to the leader of ISIS. C. 7.

8 | Shortly thereafter, Williams participated in several online group chats² during
9 | which he discussed his adherence to ISIS ideology and his desire to commit acts of
10 | violence in the name of ISIS. *See, e.g.* C. 12 (“I was going to go and do my *jihad* in Iraq
11 | and Sham [Syria] but the caliphate lost territory there . . .”; “[I] want my photos online
12 | just in case I become a *shaheed* [martyr]”; “It happened when I posted all the instruction
13 | vids and bomb making video”; “The only reason why I stay kinda quiet and don’t say or
14 | discuss things I want is so I don’t get raided before I can be martyred”; “Can somebody
15 | send me the ruling on suicide bombing. . . But by ones [sic] own hand, such as a truck
16 | bombing or vest”; “Since I have no defense I suppose I will use my offense. Nobody will
17 | help me supply myself with a shield so I will supply them with the end of my sword.”).

18 | Williams later engaged in an online chat during which, among other things, he
19 | made the following statements about his ideas for conducting an attack: “We need to
20 | attack a public event one with some degenerate celebrity like the one in 2017 with that
21 | whore Ariana Grande. . . My options are motor vehicle and the ancient one: fire. . . Fire
22 | spreads fast and can kill many if set in an apartment or place of business but can be
23 | thwarted and put out.” C. 12-13. Importantly, none of these chats involved undercover or
24 | CHS participants – these were Williams’ statements made to others who shared his
25 | radical ideologies.³

26 | ² Williams participated in chats that were closed to the public and open only to members who were vetted by a
27 | moderator. Once in the group, participants talked openly about their commitment to ISIS. C. 12, n. 8.

³ The FBI acquired these communications through various means, including legal process and screenshots provided
by informants who gained access to the forums but did not participate in the conversations themselves.

1 **3. Williams Discusses ISIS and Travel Plans with his Mother.**

2 In early January 2021, Williams’ mother recorded a conversation with Williams
3 out of concern that he was radicalized and poised to commit a violent crime. She shared
4 the recording with the FBI. *See* Complaint at pages 9-11 (transcript of relevant portions
5 of conversation). Williams specifically identified himself as a member of “ISIS”; spoke
6 of ISIS using the pronoun “we”; and talked about his plan to travel abroad to fight with
7 ISIS militants. Williams said he planned to “get[] a job” to raise money to fund his travel.
8 Williams also implicitly acknowledged being a “terrorist”:

9 **Mother:** I didn’t raise you to be racist.

10 **Williams:** I’m not racist.

11 **Mother:** And I didn’t raise you to be a terrorist, either.

12 **Williams:** I’m not racist.

13 **4. The Concerned Citizen from the Mosque Contacts the FBI Again.**

14 Around the same time, the concerned citizen from the mosque contacted the FBI
15 regarding a recent conversation he had with Williams. Williams said it was his *dawah*
16 (duty) to commit a violent act to get his message across and that he was waiting for his
17 call to *hijrah*. Williams further said that he had been making multiple attempts to contact
18 overseas ISIS members, thus far without success. The concerned citizen said that
19 Williams did not seem to have immediate plans for violence but was ready when the call
20 came. He described Williams as increasingly radicalizing. C. 13.

21 **B. The FBI Investigation Begins to More Proactively Target Williams.**

22 The investigation became more proactive after the FBI assessed the significant
23 degree of Williams’ radicalization. Beginning in February 2021, the FBI tasked CHS-4
24 and CHS-5 to have online communications with Williams over an encrypted messaging
25 app. These CHS’s had pre-existing online identities posing as recruiters for ISIS.

26 Williams first encountered CHS-4 in an online chat group. Williams discussed a
27 recent coup in Burma perpetrated by ISIS militants and stated: “There is going to be a
call for *hijrah* there very very soon. Maybe this year or the next. ... *I am trying to get
into contact [with ISIS]. But no luck so far.*” CHS-4 offered: “I know a brother who

1 | apparently has contact,” referring to CHS-5. Williams replied: “Send me his contact.
2 | I need to leave this place.” C. 14.

3 | CHS-4 then initiated a group chat between Williams, CHS-4, and CHS-5, who
4 | portrayed himself as an ISIS recruiter who would facilitate Williams’ travel for jihad. *See*
5 | Complaint 14-20 (extensive documentation of ensuing conversation). Williams expressed
6 | his desire to join ISIS and fight with ISIS troops abroad. CHS-5 explained that Williams
7 | would need to make an application to join ISIS which would be vetted by ISIS
8 | leadership. At the end of the process, Williams’ travel would be approved to a specific
9 | location. During this and subsequent conversations, CHS-5 told Williams that before
10 | final approval would be granted and a specific travel destination designated, Williams
11 | would first need to obtain a passport for travel. CHS-5 sent Williams the purported ISIS
12 | application to fill out. Williams completed the application and sent it back immediately,
13 | stating that his reason for travel was “Jihad” and describing himself as being “strong,
14 | proficient in close quarters with handgun.”

15 | Shortly thereafter, on February 14, 2021, CHS-2 became involved in the
16 | investigation. CHS-2 was an associate of Williams at his former mosque. Williams soon
17 | told CHS-2 about his plan to travel and fight for ISIS. Over the next few weeks, he
18 | attempted to convince CHS-2 to travel with him. C. 21, 22. CHS-2 ultimately “agreed” to
19 | travel with Williams, which Williams reported back to the ISIS recruiters. C. 21-22.

20 | **C. Williams Undertakes Several Independent Acts Confirming his Intentions.**

21 | From that point forward, the investigation became a sting operation that provided
22 | Williams with the opportunity to commit his crime. Contrary to Williams’ present claim
23 | of “imperfect entrapment,” the CHS’s did not hold Williams’ hand and walk him through
24 | every step of the way. Rather, the investigation was set up to require Williams to initiate
25 | the steps necessary to commit the crime to ensure he was acting of his own volition.

26 | **1. Williams Got a Job and Used the Pay Checks to Fund his Trip.**

27 | Williams had been unemployed for months. But after submitting the ISIS
application, he quickly found a job and began working regular shifts. He told the CHS’s

1 that he was working for the specific purpose of raising the funds needed for his trip to
2 join ISIS. C. 25. He pawned his laptop computer for the same reason. C. 25.

3 Williams – who was virtually destitute – then spent all his earnings on the trip.
4 After CHS-5 gave him a list of items to bring to Egypt, Williams bought several of the
5 items, including camouflage gear and military fatigues. Williams sent CHS-2 a photo of
6 himself wearing the gear and said he used his first paycheck to purchase the items. C. 27.
7 Later, Williams surprised the CHS’s by purchasing his plane ticket earlier than expected.
8 Williams selected the date of travel and specific flight itinerary on his own and sent it to
9 the CHS’s after the purchase. C. 31.

10 **2. Williams made a Martyrdom Video.**

11 In late April 2021, Williams told CHS-2 that he had prepared a video and sent it to
12 an ISIS sympathizer in Kazakhstan to publish over the internet after Williams became a
13 martyr. C. 28. CHS-2 asked Williams for a copy of the video, which Williams provided.
14 During the video, Williams exhorts others to commit violent attacks where they live.
15 Speaking on behalf of ISIS using the pronoun “we,” he demanded:

16 We want to see your action. ... Where are you, oh *mujahideen*? ... If you
17 are true and sincere in what you say, we would hear about such attacks
18 happening. We would see the blood on your knives, on the bumpers of your
19 cars, and on the barrels of your guns. So why do we not?

20 C. 28 (containing full text of Williams’ statements).⁴

21 **3. Williams Badgered the ISIS Recruiters About Speeding Up the 22 Timeline and Chose his Travel Destination.**

23 Williams did not sit back and wait to be told what to do by the CHS’s. Rather, he
24 was pushy about the timing and logistics of his travel and vocal about where he wanted to
25 go. He repeatedly asked the ISIS recruiters to speed things up and for more information.
26 *See, e.g.* C. 21 (“I need to hurry up and leave already. ... I need the approval and fast.”);

27 ⁴ Williams told the Probation Office that he made the video against his will “at the repeated prompting of CHS-2” and that this should be reflected in their text messages. See PSR ¶ 59, n. 5. This is a bogus claim with no support in the record. There are no such text messages. PSR ¶ 59, n. 5. CHS-2 first learned of the video when Williams gave him a copy. Williams made the martyrdom video on his own.

1 C. 24 (“I want to travel somewhere with desert, like Sinai. ... I wish for Sinai.”);
 2 C. 24 (“I need to know where I am supposed to go in Egypt, who will meet us, when he
 3 will meet us, things like that.”); C. 26 (“Where do we go, I need to know so I know how
 4 much for the flight ticket. ... I don’t want to spend any unnecessary time here.”);
 5 C. 30 (“I have all the supplies ready, I have the passport, and I will be able to buy a ticket
 6 by next Friday. I am just waiting on which country we need to buy a ticket for, and
 7 instructions on where to go.”); C. 30 (“Sinai, but I need instructions on which city to
 8 travel too [sic], and who I will contact to bring me to the *wilayat* [Islamic State].”).

9 **4. Williams Worried About Being Arrested by the FBI.**

10 Williams repeatedly expressed concern that he was being monitored and may be
 11 arrested by the FBI. *See, e.g.* C. 9 (telling his mother the “FBI is probably freaking
 12 parked outside” their house); C. 12 (expressing concern in chat forum about getting
 13 “raided before I can be martyred”); C. 21 (worrying about being placed on the “no-fly
 14 list”); C. 21 (“I got reported to the FBI again.”); C. 25 (text to CHS-2 stating, “FBI IS
 15 AFTER ME APPEARENTLY [sic]” with link to an article about an American couple
 16 arrested at the airport attempting to join ISIS); C. 31 (“I am very excited, just think I may
 17 get detained at the airport.”); C. 33 (telling CHS-2 he was worried about being arrested
 18 and that law enforcement “in the U.S. can do anything they want. ... This is why they
 19 make you *hijrah*, fake *hijrah*, and then they put you in the prison, where you stay.”)

20 These comments reveal that Williams was thinking (and worrying) rationally
 21 about the consequences of his actions rather than just blindly taking direction from the
 22 CHS’s. He made the decision to ignore these concerns and continue down the path of
 23 attempting to support ISIS through the commission of violent acts.

24 **5. Williams Undertook the Final Actions to Complete the Crime.**

25 Up until the very end, Williams had the opportunity not to go through with his
 26 attempted travel. But he took all the final steps necessary to complete the crime. For
 27 example, he forcefully rebuffed the opportunity provided by CHS-5 to back out of the
 crime. C. 34 (“Back out? Never, why would I back out of attaining *junnah* [eternal
 paradise]? There is nothing greater than fighting and dying in the cause of Allah.”).

1 Williams also went to bid farewell to his mother in the days before his intended travel.

2 C. 34. And, finally, he attempted to board the airplane to Egypt. C. 35.

3 **D. Williams Expressed Eagerness to Commit Heinous Acts of Violence.**

4 Williams' offense conduct is notable – and extremely disturbing – for how eager
5 he seemed to be to commit grotesque acts of violence in support of ISIS. He repeatedly
6 discussed his desire and willingness to kill, behead, and maim those who oppose ISIS.

- 7 • During their initial conversation, Williams told CHS-5 that he wanted to bring
8 “beheading and death to our enemies.” When asked, “What do you think of
9 beheading? With knife or something u know?” Williams replied: “I would love
10 to do this.” Williams also said that blood “does not bother me in the slightest
11 bit. As I said, I am firm with death and have no fear.” C. 18.
- 12 • Williams later told CHS-5: “I wanted to remind I wish to die in the battlefield.
13 I feel slightly uncomfortable with detonating myself as there is a slight
14 disagreement, but if I am told to blow myself up for my brothers and for the
15 sake of Allah I will. ... I wish to see the *kuffar* as I kill them, I want to strike
16 terror in them and make Allah pleased for doing so.” C. 30.
- 17 • Williams told CHS-4: “My stomach is turning ... stupid ass Israelis just angers
18 me. ... Well, look forward to killing them and their allies. I hope [] they allow
19 me to do a beheading. I can't wait.” C. 32.
- 20 • Williams told CHS-2, “Man, I really want to behead the, [hope] they make me
21 executioner.” CHS-2 asked, “You want to beheading people? Are you full
22 okay with that? Are you okay with blood?” Williams replied, “Yeah, 100%,
23 man. ... But, yeah, I really want to. Like, I don't want to do *ishtihadi* [suicide
24 attack]. I don't want to, you know. . . I would prefer to kill them.” CHS-2
25 asked, “Is it like beheading?” Williams responded, “Either way, it doesn't
26 bother me.” C. 33.

27 **E. Williams Planned to Support ISIS by Conducting an Attack in the United States if he was Unable to Travel and Fight Abroad.**

Williams pledged his allegiance to ISIS and intended to provide support to the
terrorist group by carrying out acts of violence. His preference was to travel overseas and
fight on the battlefield with ISIS warriors – what he referred to as “*hijrah*.” But if that
was not possible, Williams planned to commit an attack in the homeland – what he called
“*jihad*.” Williams harbored great resentment and hatred towards the United States,

1 describing it as “this disgusting land,” “this disgusting place,” “this disgusting land of
 2 *fitnah* and temptations,” and “*dar al kuffar* [land of the non-believers].” *See, e.g.* C. 13,
 3 21, 23, 30. He consistently talked about conducting an attack in the United States if he
 4 was unable to travel abroad.

- 5 • “We need to attack a public event one with some degenerate celebrity like the
 6 one in 2017 with that whore Ariana Grande. ... My options are motor vehicle
 7 and the ancient one: fire.” C. 12-13.
- 8 • “Maybe they will put me on no-fly list. ... If they do they will regret it and I
 9 will make my j** [*jihad*] here. ... I am not going to discuss this on the phone
 10 but if I am prevented from leaving the land of the *kuffar* it will be so.” C. 21.
- 11 • During a conversation with CHS-2, Williams stated: “This is what I’m saying
 12 man, [if] they prevent me from leaving America, they’re gonna fucking regret
 13 it.” Williams said he preferred to conduct an attack overseas because he could
 14 kill more people. He thought a local attack would only kill around 20 people
 15 but was willing to do it if he was not allowed to travel. C. 22.
- 16 • Williams again told CHS-2 that if the government prevents him from traveling
 17 overseas, he would be willing to conduct an attack in the United States. C. 24.
- 18 • After expressing concern that the “FBI is after me,” Williams stated: “Okay, I
 19 just don’t want to find out at the airport and be taken away. If I find out before,
 20 I can get approval for an *istshhadi* [suicide] operation here. . .” C. 25-26.
- 21 • Williams told CHS-2 that he had attempted to convince a friend who had
 22 access to firearms to commit an attack (with Williams) at the upcoming Seattle
 23 Pride Parade. Williams described the parade as: “Where the faggots do their
 24 march.” Williams planned “an *ishtihadi* [suicide] operation.” He proposed
 25 driving a semi-truck through the parade without “hav[ing] to stop once” and
 26 then to “get out and shoot.” Williams showed his friend “the map and
 27 everything.” Williams was irate that his friend did not agree to participate.
 C. 29 (containing transcript of relevant portions of the conversation).

24 Later, during his post-arrest interview, Williams confirmed over and over again
 25 that he had intended to conduct a homeland attack in the name of ISIS if he was not able
 26 to travel abroad.⁵

27 ⁵ These quotations are taken from the FBI-prepared transcript of the recorded interview.

1 When asked whether he had been seeking “permission from ISIS . . . to do
2 an attack,” Williams responded: “Typically, that’s how it works. . . . Which
3 is actually good that you detained me and are not, you know, going to
4 release me right away because, you know, I get stuck here, everybody’s
5 going to pay for it. I’m not going to be stuck here.”

6 Williams said it was his duty to “go and make *hijrah*. It’s obligatory. And if
7 I can’t then I am supposed to strike the *kufar*” in place.

8 “And so you ask me you know how can I mentally prepare myself to kill
9 these people? I would enjoy killing these people. These people are hurting
10 my family. They’re persecuting us. . . . Their government that they’re
11 supporting, that the people that they elected, you know, the people that are
12 sending their sons off to go and fight us for money. That’s majority of the
13 reason why people join the U.S. Army.”

14 “Our goal isn’t necessarily to just kill you guys. And to just terrorize you
15 guys, it’s to live our life. . . . [I]t’s my obligation to leave. If I can’t leave
16 then I need to make sure you guys, you know, the United States gets the
17 message.”

18 When asked, “[S]o if you weren’t allowed to leave, then at some point, you
19 would’ve acted upon something?” Williams responded: “Yeah. I-I promise
20 you.” Williams then discussed his knowledge of how to manufacture an
21 explosive compound he referred to as “white ice” and said, “I am actually
22 absolutely positive that’s what’s been used in the majority of attacks.”

23 “I was actually doing, planning on doing an attack [in 2016]. I wasn’t
24 planning on making *hijra* back in 2016. . . . I was supposed to do something,
25 and this gangster guy was supposed to give me a handgun. And I was going
26 to make explosives and go out shooting. But . . . he didn’t give me the gun.
27 . . . I’m actually very glad that didn’t happen because . . . that would be
completely unsanctioned. I would probably do [it] wrong, and just cause
problems. . . . And I doubt I would even probably be a martyr ‘cause I was
just a complete idiot. I just wanted to kill people.”

“It’s either *hijrah* or *jihad*. This is what we have to do. Either you leave or
you, you know, uh. . . . Either you pack your bags [] or you prepare explosive
devices. This is the only options.”

Williams said his message to the U.S. government was: “Die in your rage.
It is our phrase. It means go to hell.”

1 Williams' secondary plan of committing a homeland attack in the name of ISIS
 2 was consistent with ISIS directives and propaganda, which exhorted ISIS followers to
 3 commit attacks where they live if they were unable to travel and fight in the caliphate.
 4 Williams possessed numerous such ISIS propaganda videos on his smartphone. For
 5 example, the video entitled "Inside the Khilafah" was stored on Williams' smartphone
 6 and contained the following message to ISIS supporters like Williams:

7 If you're unable to make *hijrah* to the caliphate to support your religion and
 8 to fight on the front lines, then terrorize the disbelievers with your jihad
 9 outside of the caliphate, by targeting them and shedding their blood. Select
 10 your target and carry out a strike that will tear out their hearts and make
 11 them lose their minds, for a piercing bullet or a stab deep in the intestines or
 the detonation of an explosive device in your lands is akin to a thousand
 operations here with us. And target them on the streets. Prepare yourself for
 war and ignite the fires.

12 *See also* "Hell of the Mushrikin" (ISIS video stored on Williams' phone encouraging
 13 homeland attacks, depicting a burning map of the United States, and specifically calling
 14 for attacks using guns, fire, and explosives); "To Our Brothers and Sisters in Iman" (ISIS
 15 video stored on Williams' phone calling for attacks in America and allied nations, with
 16 scrolling text reading: "Kill them all. It is now time to rise. Slit their throats. Watch them
 17 die. Go and answer the call. Men who answered the call. Terrorizing the World.").

18 **III. Legal Issues.**

19 **A. The § 3A1.4 "Terrorism Enhancement" Applies in this Case.**

20 The Probation Office is correct to apply the § 3A1.4 "Terrorism Enhancement" in
 21 the Presentence Report. They are also correct in noting that "this enhancement's impact
 22 on the defendant's criminal history category and offense level is extreme." Addendum to
 23 PSR at 7. As a result, the Probation Office has recommended a downward variance. The
 24 government takes the same approach (although to a differing degree in terms of the
 25 variance). A fair analysis of the facts should compel the Court do the same – apply the
 § 3A1.4 enhancement and then vary downwards from the Guidelines as warranted.

26 The enhancement applies when the offense "involved, or was intended to promote,
 27 a federal crime of terrorism." *United States v. Alhaggagi*, 978 F.3d 693,699 (9th Cir.

1 2020). The term “federal crime of terrorism” is defined as “an offense that is ...
 2 calculated to influence or affect the conduct of government by intimidation or coercion,
 3 or to retaliate against government conduct.” *Id.*⁶ The government must prove the
 4 enhancement by clear and convincing evidence. *Id.* at 700.

5 Where, as here, a defendant’s offense involves planned violent acts of terrorism,
 6 the enhancement typically applies. “In cases involving violent acts of terrorism, specific
 7 intent is relatively easy to identify, either from the statements or admissions of the
 8 defendant or the nature of the offense.” *Alhaggagi*, 978 F.3d at 701-02 (contrasting cases
 9 involving violent acts with those involving non-violent support, such as setting up social
 10 media accounts, and holding that, in non-violent cases, “evidence beyond the facts
 11 underlying the offense conduct must reflect [] the enhancement’s requisite intent.”); *Id.* at
 12 702, n. 8 (favorably citing *United States v. Mohamed*, 757 F.3d 757, 760 (8th Cir. 2014)
 13 (enhancement applied to conviction for conspiracy to provide material support by
 14 assisting men who were traveling to Somalia to fight against Ethiopian troops)).

15 Williams’ offense involved his planned commission of violent acts in support of
 16 ISIS. Whether those acts were to take place during *hijrah* overseas or as part of a *jihad*
 17 homeland attack, violence was the consistent component of Williams’ offense. Moreover,
 18 Williams’ statements regarding his hatred and resentment for the United States and other
 19 nations that opposed ISIS make clear that his offense was undertaken with the intent to
 20 retaliate against and influence or affect the conduct of governments. Indeed, Williams
 21 had been telling others for months that he planned to commit a violent act *to get his*
 22 *message across* and he confirmed the same during his post-arrest interview (“If I can’t
 23 leave then I need to make sure you guys, [] the United States gets the message.”). *See*
 24 PSR Addendum at 5-7 (citing additional evidence in support of the enhancement).

25 The facts of this case call for the application of the § 3A1.4 enhancement.
 26 //

27 ⁶ The offense of conviction must also be a violation of certain enumerated statutes, such as the Material Support statute under which Williams was convicted. *Id.*

B. There is no Basis to Lower the Sentence for “Imperfect Entrapment.”

Williams asks the Court to impose a lower sentence based on his claim of “Imperfect Entrapment.” Dkt. 31. There is no basis to do so here.

Although the Ninth Circuit has recognized the imperfect entrapment defense in some sentencing contexts, it has “foreclosed imperfect entrapment as a basis for a departure *where the defendant had pled guilty.*” *United States v. McClelland*, 72 F.3d 717, 725 (9th Cir. 1995) (citing *United States v. Garza-Juarez*, 992 F.2d 896, 912 n.1 (9th Cir. 1991) (original emphasis)). Because Williams pled guilty in this case, he is foreclosed from raising the claim of imperfect entrapment at sentencing. *United States v. Briggs*, 623 F.3d 724, 730 (9th Cir. 2010) (“In this case [] we conclude that Briggs’ guilty plea forecloses him from raising this claim.”) (citing *United States v. Dickey*, 924 F.2d 836, 839 (9th Cir. 1991) (“[A]t least where a defendant pleads guilty to an offense, we see no warrant for the argument that governmental ... misconduct should mitigate the sentence of an admittedly guilty defendant.”)). See *United States v. Ritter*, 539 Fed. Appx. 811, 812 (9th Cir. 2013) (“Ritter’s ‘imperfect entrapment’ defense is foreclosed because he pleaded guilty.”) (citing *McClelland*, 72 F.3d at 725).

Even if an imperfect entrapment claim were available to Williams, the facts of this case do not support it. Although none of us can know for sure what Williams would have done had members of the community not identified him as a terrorist threat – leading to the FBI’s investigation – a commonsense review of the record belies Williams’ claim that “none of this would have happened” (PSR ¶ 125) but for the government actors.

Williams was well on his way to committing the crime prior to any involvement by CHS-2, CHS-4, or CHS-5. Community members had repeatedly identified Williams as a danger in 2017, 2018, 2020, and early 2021, when the concerned citizen from the mosque reported that Williams recently had said it was his duty to commit a violent act to get his message across and that he had been making *multiple attempts to contact overseas ISIS members* without success. Williams had previously told his mother and his online chat associates the same thing – that he already had been reaching out to ISIS for

1 deployment guidance and instructions.⁷ Williams’ online activities corroborated his
2 radicalization and intention to support ISIS through violence. He posted a video pledging
3 *bayat* to ISIS, participated in privately moderated ISIS chatrooms, and repeatedly
4 discussed his desire travel and/or commit a homeland attack in the name of ISIS. *All of*
5 *this preceded the involvement of CHS-2, CHS-4, and CHS-5.*

6 It was only after all of this that the government provided Williams with the
7 opportunity to complete the crime he had already begun pursuing. Although he started to
8 coordinate his activities through the CHS’s, Williams needed little prompting or
9 handholding to complete the offense. He immediately filled-out the “ISIS application”;
10 repeatedly badgered CHS-4 and CHS-5 about the logistics and timing of his travel; got a
11 job and pawned his laptop to raise travel funds; used all the money to buy military gear
12 and a plane ticket; created a martyrdom video; obtained a passport; said farewell to his
13 mother; and attempted to board the flight to Egypt. The government may have provided
14 Williams with the opportunity he was looking for, but he did the rest himself.

15 The FBI acted responsibly in conducting this investigation. They needed to watch
16 Williams closely because he claimed to not only be preparing to travel overseas to fight
17 with ISIS, but also to be planning a local terrorist attack. The use of the CHS’s enabled
18 the FBI to closely monitor Williams’ activities. This also allowed the FBI to divert
19 Williams down a safe avenue toward completing the crime if he chose to do so. The
20 informants did not overstep their bounds. They gave Williams room to demonstrate his
21 true intent by initiating the steps necessary to complete the crime.

22 The Court should reject Williams’ present attempts to portray himself as nothing
23 but a hand puppet of the CHS’s. There is no basis to reduce the sentence for “imperfect
24 entrapment.”⁸

25 ⁷ Similarly, during Williams’ first contact with CHS-4, he stated, “*I am trying to get into contact [with ISIS]. But no luck so far.*” C. 14.

26 ⁸ Williams’ argument about the reliability of the CHS’s is a distraction. The only contacts Williams had with CHS-4
27 and CHS-5 were online. All their communications were preserved. The reliability of these informants is simply not
germane to Williams’ offense. Regarding CHS-2, the government disclosed from the outset that he had pending
state charges and was working with the FBI in hopes of consideration as to those charges. C. 21, n. 15. Based on

1 **IV. Sentencing Recommendation.**

2 The government recommends a sentence of imprisonment of **180 months** and a
3 term of supervised release of 15 years. The § 3553(a) factors support this sentence.

4 **A. The Nature and Circumstances of the Offense and Need for the Sentence
5 to Reflect the Seriousness of the Offense and to Provide Just Punishment.**

6 Williams' offense conduct was extremely serious. For years he had been obsessed
7 with ISIS' violent ideology. He was becoming increasingly radicalized and volatile. By late
8 2020 into early 2021, Williams consistently was discussing his desire to travel overseas
9 to fight on the battlefields with ISIS or to conduct a terrorist attack in the United States if
10 he was unable to travel. He was eager to kill the *kufar* by means of beheadings,
11 shootings, and explosive attacks; and was even willing to conduct a suicide operation if
12 directed. He derived great pleasure envisioning himself committing these violent acts and
13 was proud to be martyred in the name of ISIS. Williams' actions throughout this
14 investigation – both before and after the involvement of the CHS's – showed that he was
15 serious about what he said.

16 Fortunately, Williams connected with CHS-4 and CHS-5, and not the real thing.
17 Actual ISIS recruiters are online and connect with U.S. persons to facilitate their travel in
18 a similar manner as CHS-4 and CHS-5 did for Williams. There is every reason to believe
19 that Williams would have undertaken the same travel had he succeeded in connecting
20 with the real ISIS recruiters he had been seeking out on his own for months.

21 We will never know for sure whether Williams would have conducted a
22 homeland attack in the name of ISIS had his efforts to travel continued to be stymied. But
23 there is good reason to be concerned. Time after time, we have watched in horror as

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25 CHS-2's cooperation, the state prosecutors later reduced the charges and the FBI paid him for his services (although
26 he did not expect to receive payment). The government has produced extensive discovery materials documenting
27 CHS-2's motives for cooperation and the benefits he received. Regardless, there is nothing that raises serious
questions about CHS-2's reliability during this investigation. CHS-2's contacts with Williams were documented and
preserved in the form of text messages and audio recordings. Although CHS-2 at times assisted Williams with some
logistics (*i.e.*, driving Williams to the passport application appointment and providing him with money to pay for the
passport at Williams's request), C. 23, 24, Williams generally acted independently and of his own volition and even
went so far as to "recruit" CHS-2 to join ISIS.

1 individuals commit mass shootings and other terrorist attacks. These attacks typically are
2 committed by self-radicalized individuals (through online propaganda) who become
3 obsessed with violence, harbor resentment toward society in general, feel like they have
4 nothing to live for, and who suffer from mental health issues. Williams presents in the
5 exact same way. He repeatedly told others that he planned to commit a homeland attack if
6 he could not travel abroad. He confirmed that was his plan during the post-arrest
7 interview. There is little reason to doubt this.

8 **B. Williams' History and Characteristics.**

9 Williams' personal history and characteristics contain both mitigating and
10 aggravating aspects. The government acknowledges that Williams had a very challenging
11 upbringing. He was not set up for success, to say the least, and that is not his fault.
12 Despite that, Williams found himself with a strong network of support. His mother –
13 despite her own issues – tried to move Williams off the ISIS path he had embarked on.
14 His high school administrators saw the warning signs; they contacted the FBI and
15 provided him with IEP support and in-school counseling. And the members of his
16 mosque did everything they could to help Williams, providing him with religious
17 guidance, food, shelter, and electronic devices to use for a job search. Williams rejected
18 their efforts to de-radicalize him and instead used the devices to collect ISIS videos and
19 communicate with others about ISIS. So, although Williams certainly faced challenges, in
20 the end he had a support system to help him overcome. That is more than some people
21 end up with. Williams chose to reject this help and continue his pursuit of supporting
22 ISIS through planned acts of violence.

23 The defense focuses heavily on Williams' mental health issues. The government
24 acknowledges that these are legitimate and serious conditions. And it is appropriate for
25 the Court to mitigate Williams' sentence to a degree considering these issues. But
26 Williams overstates the extent to which these conditions mitigate his culpability.

27 For example, Williams argues that he lacked the mental capacity to form the
specific intent required under the § 3A1.4 enhancement. However, the record shows that
Williams “does not lack capacity; he is an intelligent individual who understood and

1 supported the values endorsed by ISIS. Being easily convinced of damaging, dangerous,
2 and violent beliefs is not the same as lacking capacity to form specific intent.” PSR
3 Addendum at 7. Indeed, Williams was well-versed and articulate in discussing ISIS’
4 radical ideology and he engaged in the offense conduct intending to promote the same.
5 Williams’ capacity to fully appreciate the nature and consequences of his actions also is
6 reflected by how often he worried about the possibility of being arrested by the FBI,
7 placed on the no-fly list, etc.

8 Williams further argues that his mental health issues make him less of a danger
9 moving forward because he is incapable of engaging in planned, organized, or strategic
10 violence. This misses the point. No one is suggesting that Williams would be likely to
11 mastermind a sophisticated attack. Nor does ISIS encourage its followers to do so. They
12 promote simple, impulsive attacks using readily available means such as firearms,
13 vehicles, or basic explosives. Williams is more than capable of conducting such an attack
14 – exactly the sort of attack he discussed undertaking – notwithstanding (and perhaps
15 fueled by) his mental health issues.

16 In the end, Williams’s mental health is a double-edged sword. It provides some
17 mitigation, but also makes him volatile, reactive, and susceptible to the influences of
18 others who espouse dangerous and violent ideologies. A lengthy sentence is necessary to
19 protect the public from Williams.

20 **C. The Need to Afford Adequate Deterrence to Criminal Conduct.**

21 This case presents the Court with an opportunity to send an important message of
22 general deterrence. Sadly, this case is far from unique. ISIS and other terrorist groups
23 engage in the recruitment of would-be supporters using online propaganda
24 communication tools. Far too many U.S. persons fall prey to this recruitment and attempt
25 to travel to fight with terrorist groups overseas or seek to commit local attacks in the
26 name of terrorist organizations. The sentence in this case will be well-publicized and
27 therefore may have a powerful deterrent effect on those who would seek to support
foreign terrorist organizations through acts of violence.

V. Conclusion.

For the foregoing reasons, the government recommends the Court sentence Williams to a term of imprisonment of 180 months and a term of supervised release of 15 years, with all the conditions of supervised release recommended by the Probation Office.

DATED this 22nd day of November, 2022.

Respectfully submitted,

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s/ Todd Greenberg
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Exhibit 1

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

NO. MJ21-322

COMPLAINT FOR VIOLATION

v.

ELVIN HUNTER BGORN WILLIAMS,
Defendant.

BEFORE, Chief United States Magistrate Judge Brian A. Tsuchida, Seattle, Washington.

The undersigned complainant, David Narrance, Special Agent, Federal Bureau of Investigation, being duly sworn states:

COUNT 1

(Providing Material Support to a Designated Foreign Terrorist Organization)

Beginning in or before November 2020, and continuing through May 28, 2021, within the Western District of Washington, and elsewhere, ELVIN HUNTER BGORN WILLIAMS knowingly attempted to provide material support and resources, that is, personnel, including himself, and services, to a designated foreign terrorist organization, namely, the Islamic State or Iraq and al-Sham (“ISIS”), with knowledge that ISIS was a designated terrorist organization and that it engaged in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

1 This complaint is to be presented by reliable electronic means pursuant to Federal
2 Rules of Criminal Procedure 4.1 and 41(d)(3). And the complainant further states:

3 **Affiant's Training and Experience**

4 I, David Narrance, am a Special Agent with the Federal Bureau of Investigation
5 ("FBI"). I have been a Special Agent with the FBI since August 2014. I am presently
6 assigned to the FBI Seattle Joint Terrorism Task Force ("JTTF"). I have received
7 training regarding investigating terrorism related offenses and other national security
8 matters. During my career, I have participated in numerous investigations of individuals
9 who were involved in terrorist related activities and motivated by extremist ideologies.
10 Prior to joining the FBI, I worked for eight years as a federal agent for the United States
11 Border Patrol.

12 The facts in this affidavit come from my training and experience, and information
13 obtained from other agents, law enforcement officers, intelligence analysts, and
14 witnesses. This affidavit is intended to show there is sufficient probable cause that the
15 defendant committed the offense alleged above and does not set forth all my knowledge
16 about this matter.

17 **The Islamic State's Designation as a Foreign Terrorist Organization**

18 On or about October 15, 2004, the U.S. Secretary of State designated al Qaeda in
19 Iraq ("AQI"), then known as Jam 'at al Tawid wa' al-Jahid, as a Foreign Terrorist
20 Organization ("FTO") under Section 219 of the Immigration and Nationality Act (the
21 "INA") and as a Specially Designated Global Terrorist entity under Section 1(b) of the
22 Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the
23 designation of AQI as a FTO under Section 219 of the INA and as a Specially Designated
24 Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias
25 Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also
26 added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (i.e.,
27 "ISIS," which is how the FTO will be referenced herein), the Islamic State of Iraq and
28 Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-

1 Furquan Establishment for Media Production. On September 21, 2015, the Secretary
2 added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date,
3 ISIS remains a designated FTO.

4 **Overview of the Investigation**

5 Williams is a self-radicalized ISIS adherent who, in November 2020, pledged an
6 oath of “bayat” (allegiance)¹ to Abu Ibrahim al-Hashimi al-Quarashi, the current leader
7 of ISIS. Since then, Williams has told others, including family members, friends, and
8 associates, as well as multiple FBI confidential human sources (“CHSs”), that he wants to
9 travel overseas, join ISIS, and wage jihad on behalf of ISIS.

10 In February 2021, Williams began communicating over an encrypted messaging
11 application with two FBI CHSs who represented themselves to be ISIS recruiters who
12 would approve and facilitate Williams’ travel for jihad on behalf of ISIS. Through these
13 purported ISIS recruiters, Williams tendered a putative application to ISIS listing his
14 reason for travel as “jihad.” The “recruiters” ultimately told Williams that his application
15 had been approved, and Williams requested to travel to the Sinai desert to fight with ISIS.
16 The “recruiters” told Williams that his travel would receive final authorization after he
17 obtained a passport and purchased an airline ticket.

18 During the spring of 2021, Williams applied for a U.S. passport and worked at a
19 job in the Seattle area to save money for his intended travel. Williams also recruited
20 another Seattle area associate to travel with him; unbeknownst to Williams, this associate
21 recently had become another FBI CHS. Williams received his passport on May 6, 2021.
22 That same day, Williams sent the purported ISIS recruiters a photograph of the passport
23 and purchased an airline ticket for travel from Seattle, via Amsterdam and Paris, to Cairo,
24 Egypt, departing on May 28, 2021, at 1:35 p.m. Williams was arrested on May 28, 2021,
25 at Seattle-Tacoma International Airport, as he attempted to board the flight to Cairo.

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¹ Where English words in brackets follow Arabic words in this document, they have been supplied by an FBI
Arabic linguist who reviewed the affidavit.

Background of the Investigation

Williams is a United States citizen who was born on November 12, 2000, in or near Santa Rosa, California. Williams first came to the attention of the FBI in October 2017 when, as a juvenile, he caused concern among administrators at his high school. The school administrators contacted the FBI and reported, among other things, that Williams told others at the school that he wanted to join ISIS and claimed that the May 2017 ISIS attack at a music concert in Manchester, United Kingdom, during which numerous people were killed and injured, was justified because the performer dressed provocatively.

FBI Special Agents interviewed Williams' mother on November 17, 2017. Williams' mother reported that Williams told her he wanted to move to Syria or Iraq to fight for ISIS. She also stated that Williams had been kicked off social media for terms of service violations related to pro-ISIS posts. Williams' mother explained that she terminated internet service at her home because Williams was using the internet to access ISIS-related sites and social media accounts. Williams' mother made a subsequent report to authorities that she was concerned Williams wanted to travel to Syria to join a foreign terrorist organization.

Concerned Citizen Approaches the FBI about Williams' Activities

In November 2020, a concerned citizen approached the FBI on behalf of a Seattle area mosque. The citizen reported that members of the mosque had been looking after Williams for over a year as an act of charity – encouraging Williams to de-radicalize, assisting him with a place to live, with food, and with tuition for a semester of college. Members of the mosque also provided Williams with a cell phone and a laptop computer, in hopes that they would assist Williams with a job search. The mosque members made clear to Williams that he would be required to abandon ISIS if wanted to accept the mosque's help. When the concerned citizen observed Williams using the phone to view ISIS videos and engage in online chats with like-minded radical individuals, the concerned citizen directed Williams to return the cell phone that had been provided to

1 him. Members of the mosque reviewed the cell phone and were disturbed to find
2 numerous ISIS-related videos that depicted scenes of graphic violence (including
3 summary executions and beheadings by ISIS militants); other ISIS military propaganda;
4 and a video on how to manufacture explosives, which Williams appeared to have
5 distributed to others. The concerned citizen also examined an encrypted messaging app
6 on the phone and found that Williams had accessed numerous ISIS videos. Members of
7 the mosque ultimately returned the phone to Williams at his request because Williams
8 said that he needed a phone to facilitate a job interview. The concerned citizen explained
9 that the mosque terminated its efforts to support Williams after this interaction.²

10 In response to this new information, the FBI opened an investigation of Williams.
11 FBI agents interviewed Williams' mother on several occasions during late 2020 and early
12 2021. She explained that Williams had recently been attending a mosque and that he
13 upset the members due to his radical behavior. She stated that members of the mosque
14 contacted her and said they were worried that Williams would be "a terrorist and do an
15 attack one day." According to the mother, Williams was both verbally and physically
16 abusive to both herself and her daughter on a regular basis.

17 Williams' mother said that Williams refers to ISIS as "our people" and that he was
18 becoming more radical each day. According to the mother, Williams had recently begun
19 talking about plans to move to Burma to "become a terrorist for real," in her words.
20 Williams stated that ISIS has a list of cities in Burma with ISIS members inside.
21 Williams further said that "everyone is waiting" and soon there would be a terrorist
22 attack. Williams claimed to be waiting for approval to carry out an attack and described
23 a chain of command within ISIS that approves such attacks. The mother also stated that
24 Williams was obsessed with weapons, although she did not know him to have direct
25 access to any weapons. She further stated that Williams likes to talk about explosives
26 and chemicals and has read books about explosives in the past.

27 _____
28 ² The concerned citizen described above subsequently became an FBI CHS, hereafter referred to as "CHS-1."
CHS-1 has declined any compensation for CHS-1's work.

1 On December 26, 2020, FBI agents interviewed one of Williams’ former
2 roommates who lived with him in or about October 2020. When shown a photograph of
3 Williams, the roommate turned to his other roommates (who were present for the
4 interview) and stated, “Yeah, the terrorist I was talking about. You guys thought I was
5 joking.”³ According to the roommate, Williams told him that he (Williams) wanted to
6 join ISIS and would regularly and openly discuss his affinity for ISIS. The roommate
7 further stated that he saw Williams regularly engage in ISIS-related online chatrooms.
8 The roommate described Williams as “radical.”

9 FBI agents interviewed Williams on several occasions during late 2020. On
10 December 22, 2020, Williams spoke with FBI agents and admitted that he regularly made
11 pro-ISIS postings on various social media platforms. Williams further stated that he no
12 longer attended any mosque because he was “too extreme” for all the local mosques.
13 Williams stated that he felt isolated, lonely, and repeatedly expressed the desire to “find a
14 wife.” Williams stated that he had been “off of [his] medications” for about a year. He
15 admitted to previously having suicidal thoughts but claimed to currently have no
16 intentions of hurting himself or others. Williams told the agents that he wants to travel to
17 the Maldives because there are more ISIS supporters there.

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³ Throughout this affidavit, when oral statements are put in quotation marks, they are the most accurate version of the statements available to date. In some instances, more formal transcriptions may become available at a later time.

Williams Pledges Allegiance to ISIS

On or before November 20, 2020, Williams posted an online video of himself pledging allegiance to ISIS.⁴ In the video, Williams is heard pledging his allegiance to Abu Ibrahim al-Hashimi al-Qurashi, the leader of ISIS. There is text imposed over the beginning of the video which reads, “Gave my pledge today,” as depicted below:



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⁴ According to records obtained during this investigation, two days earlier, on or about November 18, 2020, Williams sought guidance online from another person regarding how to properly pledge allegiance, or “make bayat,” to ISIS, asking, “Asalaamu alaikum, can you send me what I need to say for my pledge.” The other person responded, “You mean bayat?” Williams responded in the affirmative. The other person responded with the following text, which Williams used in his video: “I (your name) swear allegiance to Amir al-Mumineen Abu Irahim Al-Hashimi Al-Qurayshi in following the religion of Allah, in obeying the ruler in what I like and dislike, in obedience until I see a clear kufr from him and will have argument from Allah to this.”

1 Williams thereafter began describing himself as a member of ISIS. For example,
 2 on November 24, 2020, Williams engaged in an online conversation with CHS-3.⁵ CHS-
 3 3 asked if Williams was a true supporter of “Dawlah,” another name for ISIS. Williams
 4 responded, “If you have questions regarding *our* aqeedah [creed] and beliefs I can send
 5 you some stuff. There is a lot of slander against *us*.” (emphasis added). On January 5,
 6 2021, Williams told CHS-3 about his interest in traveling to Burma to “make hijrah.”
 7 Among other things, Williams stated: “There will be a call to make hijrah soon []. The
 8 location is Burma, I hope to see you there. . . . I’ll let you know when they make the
 9 call, brother.” Based on my training and experience, and my familiarity with the facts of
 10 this investigation, I understand that the phrase “make hijrah” in this context is a reference
 11 to foreign travel for the purpose of fighting on behalf of ISIS.

12 In January 2021, an FBI online covert employee (“OCE-1”) contacted Williams
 13 after observing ISIS propaganda and beheading videos on Williams’s social media
 14 accounts. Williams was initially suspicious of OCE-1, but eventually engaged him in
 15 conversation. Among other things, Williams told OCE-1: “Anwar al Awlaki is one of my
 16 favorites, he was made *shaheed* [martyr].”⁶ Williams also told OCE-1 that he wanted to
 17 travel to Burma to fight for ISIS, and sent OCE-1 violent ISIS videos and two ISIS
 18 propaganda publications. One publication was issued by ISIS’s al-Hayat Media Center in
 19 August 2017. In the publication, ISIS reiterated its previous claims of responsibility for
 20 recent terrorist attacks that occurred in Spain, Russia, Brussels, and Turkey. The second
 21 publication was released on December 25, 2020, by a group in Burma allied with ISIS.
 22 The publication exhorted ISIS followers to travel to Burma to fight on behalf of ISIS.

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 25 ⁵ CHS-3 was opened by the FBI on June 3, 2020. CHS-3 was arrested on state criminal charges and agreed to
 26 cooperate with the FBI in consideration for a sentencing reduction. CHS-3 also has been compensated for some of
 27 CHS-3’s services. CHS-3’s reporting consistently has been reliable and corroborated. Among other things, CHS-
 28 3’s cooperation has resulted in thwarting two planned terrorist attacks.

⁶ Anwar Al-Awlaki was an Islamic lecturer and a leader of Al-Qaeda in the Arabian Peninsula (“AQAP”), a
 Yemen-based designated foreign terrorist organization that has claimed responsibility for terrorist acts against
 targets in the United States, Saudi Arabia, Korea and Yemen since its inception in January 2009. Pursuant to a
 Presidential Executive Order, Al-Awlaki was designated by the United States as a “Specially Designated Global
 Terrorist” on July 12, 2010. Al-Awlaki was reportedly killed in Yemen in September 2011.

1 **Williams Discusses ISIS and his Travel Plans with a Family Member**

2 In early January 2021, a family member contacted the FBI and reported that they
3 had recorded a conversation with Williams out of concern that Williams was radicalized
4 and poised to commit a crime. The family member shared the recording with the FBI.⁷
5 During the conversation, Williams identified himself as a member of ISIS, spoke of his
6 suspicion that he was being monitored by the FBI, and spoke of plans to travel to Burma
7 to fight with ISIS militants. When Williams began speaking about traveling to Burma, it
8 prompted the family member to begin recording the conversation. Relevant portions of
9 the conversation are transcribed below:

10 **Relative:** Okay, so what was that Hunter? So, what pl.... what did you
11 say? Burma. That's where I stopped.

12 **Williams:** I said probably a major reason why the FBI is so interested in
13 me, is because we are more of a threat now than we were before because
14 we are literally everywhere in territories in Africa. We have territories in
15 Afghanistan, Iraq now, again. Sham, which is Syria, again. We have
16 territories in Lebanon. We have territories in Jordan. We have territories in
17 Myanmar which is also known as Burma. We have territories in Kashmir,
18 which India is currently occupying. We're even forming in India.

17 **Relative:** Okay, who is "we" though? Is there a name? I'm just asking.

18 **Williams:** I said it like six times []. I'm not gonna repeat myself.

19 **Relative:** What's the name?

20 **Williams:** Especially if the FBI is probably freaking fucking parked outside.

21 **Relative:** Is there a fucking name?

22 **Williams:** Yes, I just said it! ISIS, Dawlah, Daesh. It's the same word.

23 **Relative:** So, what Hunter. You're going to move to Burma?

24 **Williams:** Yeah, I'm going to go live there.

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28 ⁷ The family member recorded this conversation on their own initiative, with no involvement or prompting to record conversations by the FBI.

1 **Williams:** Through [website], it's a site.

2 **Relative:** So, anybody can just...

3 **Williams:** No, not anybody. It's a secret site.

4 **Relative:** So, how did you find it if it's secret?

5 **Williams:** 'Cause I'm in the loop.

6 * * * * *

7 **Relative:** Okay, well, I didn't raise you to be racist.

8 **Williams:** I'm not racist.

9 **Relative:** And I didn't raise you to be a terrorist, either.

10 **Williams:** I'm not racist.

11 * * * * *

12 **Relative:** So, how do you know where you're moving? What do you mean?

13 **Williams:** It hasn't been... We're not told to go anywhere yet.

14 **Relative:** Who tells you?

15 **Williams:** We'll hear it.

16 **Relative:** From?

17 **Williams:** It will probably be all over the news.

18 **Relative:** From where? A bird? Where do you hear it from?

19 **Williams:** Yeah, a little tweety bird [].

20 **Relative:** Where do you hear it from? Who?

21 **Williams:** The loop.

22 **Relative:** What loop?

23 **Williams:** Somebody hears it from somebody, who hears it from
24 somebody. It's a chain of command.
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Williams Participates in Radical Online Group Chats

Williams also spoke of his allegiance to ISIS and his determination to travel in support of ISIS in several online group chats during the same time period.⁸ For example, records obtained in the course of this investigation document that on or about November 13, 2020, Williams participated in a group chat using the moniker “thatrussianmuslim,” during which Williams explained how he first learned about Islam. Williams also stated, “I was going to go and do my jihad in Iraq and Sham but the caliphate lost territory there . . .” In another group chat on or about November 18, 2020, Williams stated, “The caliphate will rise again soon *inshAllah* [God willing], the only reason it was defeated is they stopped people from making hijrah and funding the caliphate.” On February 15, 2021, Williams, using the account “ar_rusi_al_assad,” told another person online: “I will be martyred.”

On or about November 12-18, 2020, Williams used the account “thesilentmuwahid” to engage in group chats over an encrypted social media application. Among other things, Williams stated: “[I] want my photos online just in case I become a *shaheed* [martyr]”; “It happened when I posted all the instruction vids and bomb making video”; “The only reason why I stay kinda quiet and don’t say or discuss things I want is so I don’t get raided before I can be martyred”; “Can somebody send me the ruling on suicide bombing. . . But by ones own hand, such as a truck bombing or vest”; “Since I have no defense I suppose I will use my offense. Nobody will help me supply myself with a shield so I will supply them with the end of my sword.”

On December 23, 2020, Williams, using the moniker “Ali Ar-Rusi,” engaged in an online chat during which, among other things, he made the following statements about ideas for conducting an attack:⁹

⁸ Williams often participated in chats that were closed to the public and open only to members who were vetted by a moderator. Once in the group, participants tended to talk freely about their ISIS affiliation and commitment to radical jihad.

⁹ This conversation was observed online by a former FBI CHS, who was not a participant in the conversation but captured screenshots of it and provided them to the FBI.

- 1 • “We need to attack a public event one with some degenerate celebrity like
- 2 the one in 2017 with that whore [name omitted].”
- 3 • “My options are motor vehicle and the ancient one: fire.”
- 4 • “Fire spreads fast and can kill many if set in an apartment or place of
- 5 business but can be thwarted and put out.”
- 6 • “Idk how to make explosives powerful enough for anything nor do I have
- 7 the money.”

8 Williams continued to discuss his desire to travel to join ISIS through early 2021.
 9 On or about February 15, 2021, Williams used the moniker “ar_rusi_al_assad” to tell
 10 another person, “I am getting [a] passport to leave this disgusting land. Before I do my
 11 [ISIS application] must be approved and then I shall leave once they are.” On
 12 February 16, 2021, in response to an online solicitation for donations to support ISIS,
 13 Williams responded, “Well [] I may be able to help with the donations, I am unsure as I
 14 am saving to travel but if I get credit card I will most definitely help.”

15 Williams Begins to Arrange Travel to Fight for ISIS

16 On or about January 4, 2021, Williams spoke to CHS-1 about his desire to travel
 17 overseas and join ISIS. According to CHS-1, Williams said it was his *dawah* (duty) to
 18 commit a violent act to get his message across. Williams further stated that he was
 19 waiting for his call to hijrah. CHS-1 asked Williams whether he was in contact with any
 20 ISIS authorities overseas to receive the call to hijrah. Williams replied, “You would be
 21 surprised.” Williams later admitted that he had been making multiple attempts to contact
 22 overseas ISIS members, although he said they were suspicious that he was law
 23 enforcement. According to CHS-1, at that time, Williams had no immediate plans for
 24 violence, but was ready for it when the call came. CHS-1 stated that Williams was
 25 becoming increasingly radicalized as he spent more and more time online.

26 On or about February 4-6, 2021, Williams engaged in a chat via an encrypted
 27 messaging app with two individuals who represented themselves to be ISIS recruiters. In
 28

1 fact, they were FBI confidential human sources, CHS-4 and CHS-5.¹⁰ Williams first
 2 encountered CHS-4 in an online group chat. CHS-4 portrayed himself as someone who
 3 had direct contacts with an overseas ISIS recruiter. Williams asked CHS-4 to introduce
 4 him to the recruiter. CHS-4 ultimately introduced Williams to CHS-5, who was
 5 described as an overseas ISIS recruiter who would facilitate Williams' travel for jihad.

6 During one of his early conversations with CHS-4, Williams discussed a recent
 7 coup in Burma perpetrated by militants who pledged allegiance to ISIS. Williams stated:
 8 "There is going to be a call for hijrah there very very soon. Maybe this year or the next."
 9 Williams then stated, "I am trying to get into contact [with ISIS]. But no luck so far."
 10 CHS-4 offered: "I know a brother who apparently has contact," referring to CHS-5.
 11 Williams replied: "Send me his contact. I need to leave this place." CHS-4 then initiated
 12 a group chat between Williams, CHS-4, and CHS-5, some of which is reflected in the
 13 below screenshots. Williams used the moniker "Ali Ar-Rusi" during the conversation.

14 Williams asked CHS-5 for guidance on how to "make hijrah," as follows:¹¹



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24 ¹⁰ CHS-4 was opened by the FBI on or about July 8, 2020. CHS-4 was previously investigated by the FBI due to
 25 his expressing the desire to fight overseas in Yemen and become a mujtahid/martyr. CHS-4 was offered a
 26 cooperation agreement in lieu of charges. CHS-4's motivation was initially to work off these charges. CHS-4 also
 has been compensated for his services. CHS-4 has been reliable and some of his reporting has been corroborated.

27 CHS-5 was opened by the FBI on or about May 26, 2015. CHS-5 was previously the subject of an FBI counter-
 28 terrorism investigation, but was never charged with a crime. CHS-5 has assisted the FBI in several investigations.
 CHS-5 has been reliable and much of his reporting has been corroborated. Over the years, CHS-5 has been
 compensated for his services.

¹¹ In order to protect the identity of sources, CHS monikers and avatars have been removed from all images.

1 When CHS-5 asked, “U need hijrah *akhi* [brother]?” Williams responded:

2 | U need hijrah ahky?
 3 | Yes I want to make hijrah and help
 4 | with the next caliphate 8:33 PM

5 Williams added:

6 | **Ali Ar-Rusi**
 7 | I have nothing here in this dunya,
 8 | and I wish to please Allah and
 9 | attain martyrdom 8:33 PM

10 The conversation continued with Williams stating:

11 | U want istashahadiya?
 12 | Yes brother, I seek martyrdom in
 13 | the cause of Allah 8:34 PM

14
15 CHS-5 then asked if Williams wished to mount an attack in America or travel
16 abroad to fight jihad:¹²

17 | **Ali Ar-Rusi**
 18 | Yes brother, I seek martyrdom in the ca...
 19 | Sorry ahk but confused u want to
 20 | make migration or to do
 21 | istashahadiya fee amerika or after
 22 | hijrah 8:34 PM

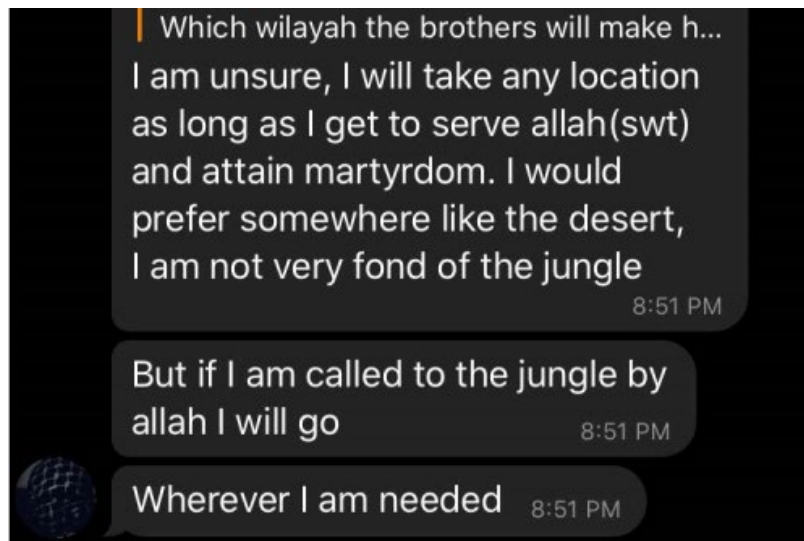
23 | **Ali Ar-Rusi**
 24 | I want to leave America to help my
 25 | brothers and fight in the cause of
 26 | Allah 8:35 PM

27
28 ¹² Based upon my discussions with FBI linguists, I understand that the Arabic phrase *istashahidiya fee amerika* means self-martyrdom, *i.e.*, a suicide attack, in the United States.

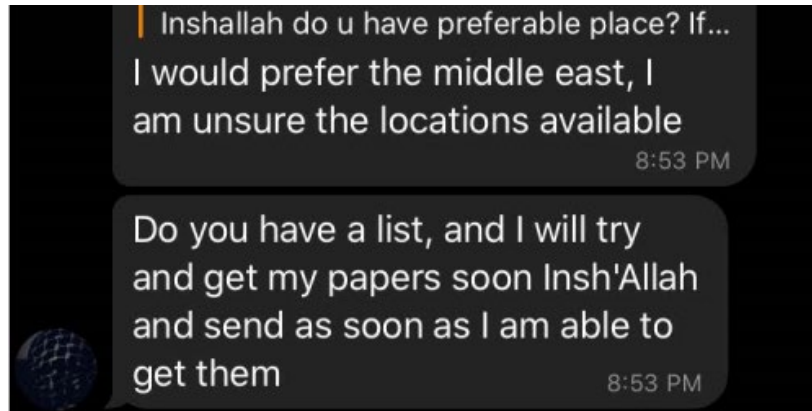
1 As the conversation went on, CHS-5 explained that Williams would need to make
2 an application to join ISIS, and that the application would be vetted by ISIS leadership.
3 Williams endeavored to prove his commitment to CHS-5, sending photographs of himself
4 and noting, “I train hard to serve allah in the fields of jihad.”



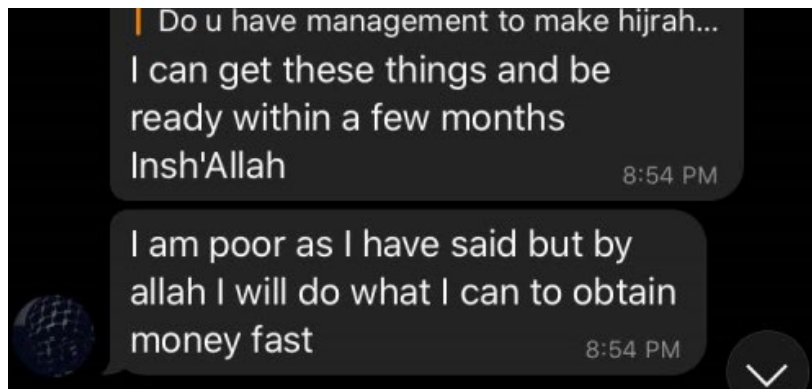
17
18 CHS-5 asked Williams where he would like to travel, and Williams responded:



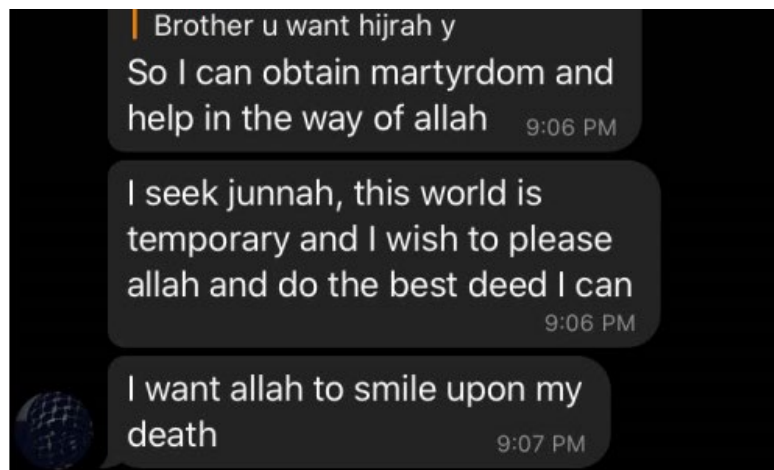
Williams added:



CHS-5 asked whether Williams had the means to travel, including money for an airline ticket and passport, and Williams responded:



Later in the conversation, CHS-5 probed Williams' commitment to jihad, asking why he wanted to make "hijrah." Williams responded as follows:¹³



¹³ Based on discussions with FBI linguists, I understand that the Arabic term *junnah* means eternal paradise.
COMPLAINT - 17

1 CHS-5 asked Williams, “U know brother the media that show beheading and
2 death to our enemies. This u want?” Williams responded, “Indeed.” The conversation
3 continued as follows:

4 U have problem with killing or
5 something? 9:09 PM
6 Ali Ar-Rusi
7 No I do not 9:09 PM
8 Not in the slightest bit 9:09 PM

9
10 If u are fighting and u find enemy
11 who surrender to u and ir by
12 urself. What do u do. 9:11 PM
13 Ali Ar-Rusi
14 I take him as a prisoner unless told
15 to do otherwise, if the order is
16 given to shoot him I will do so, if
17 the order is to capture I will do so
18 9:12 PM

19 What do u think of beheading?
20 With knife or something u know
21 9:14 PM
22 Ali Ar-Rusi
23 I would love to do this 9:14 PM

24 Blood doesn't bother u???? Hhh
25 blood bother me from my cut
26 9:15 PM
27 Ali Ar-Rusi
28 No it does not bother me in the
slightest bit 9:15 PM
As I said I am firm with death and
have no fear 9:15 PM

1 As the conversation continued, CHS-5 explained a months-long approval process
 2 through which Williams' application would be reviewed by multiple layers of ISIS
 3 leadership. At the end of the process, Williams' travel would be approved to a specific
 4 location, and he would be notified. CHS-5 told Williams that after travel and training in
 5 that location, he would be an "official mujahid." During this and subsequent
 6 conversations, CHS-5 made clear to Williams that before final approval would be granted
 7 and a specific travel destination designated, Williams would first need to obtain a
 8 passport for travel. Williams asked, "How long does this [ISIS application process]
 9 usually take to send and get approval?" CHS-5 replied that it would take at least one
 10 week for initial approval and likely one month for final approval. Williams responded:



19 CHS-5 sent Williams the purported ISIS application to fill out. Williams tendered
 20 the below responses to the application, providing his full name, stating that his reason for
 21 travel was "Jihad," and describing himself as being "strong, proficient in close quarters
 22 with handgun":¹⁴

23

24

25

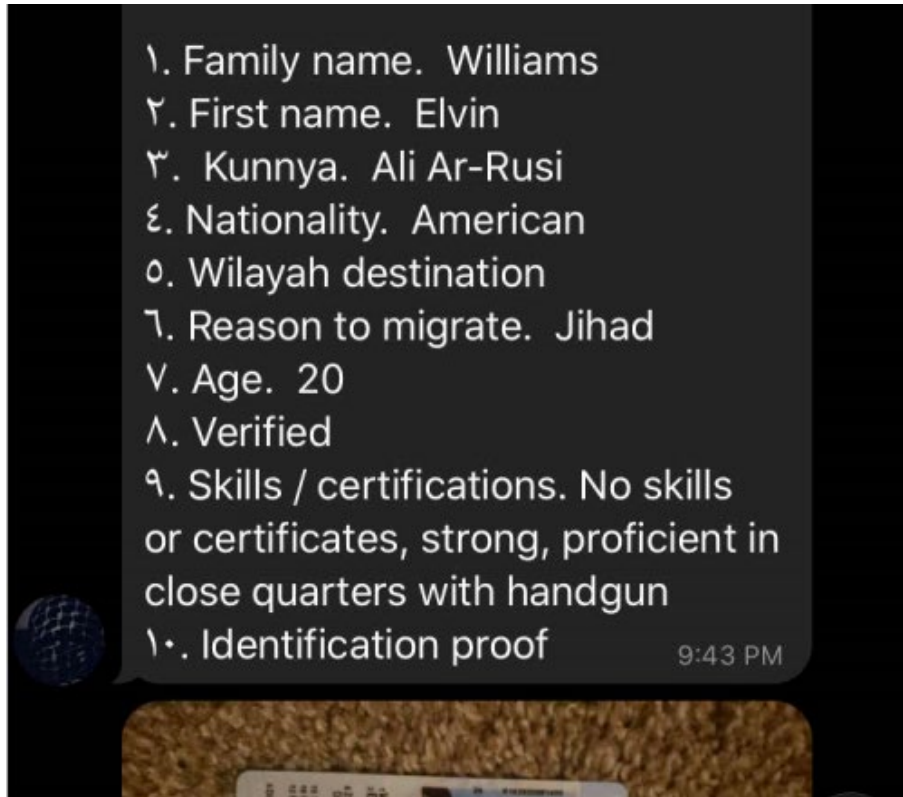
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¹⁴ CHS-5 told Williams to ignore questions five and seven in the application ("Wilayah destination"/"Verified").
 COMPLAINT - 19

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During the conversation, Williams sent CHS-5 photographs of his Social Security card, his Washington State driver’s license, and a picture of himself:

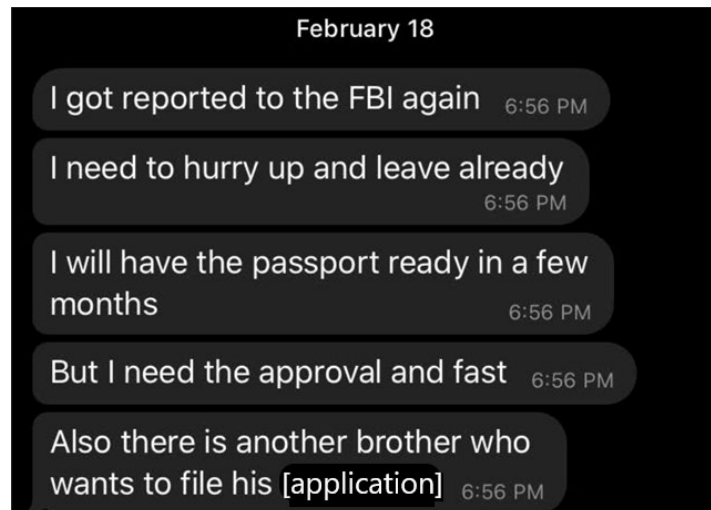


Williams Begins Preparations to Travel

During this investigation, an FBI confidential human source, CHS-2, communicated with Williams online and in person.¹⁵ On February 14, 2021, Williams told CHS-2 that he needed to obtain a passport immediately. Williams asked CHS-2 to help him pay for the passport. Williams initially would not divulge why he wanted to obtain the passport. However, in the days that followed, Williams told CHS-2 about his desire to travel to fight with ISIS, and he attempted to convince CHS-2 to join him.

On or about February 18, 2021, during a text conversation with CHS-2, Williams stated he was worried that he would not be able to leave “this disgusting place,” and added, “Maybe they will put me on no fly list If they do they will regret it and I will make my j** [jihad] here.” When CHS-2 asked Williams to clarify, Williams responded, “I am not going to discuss this on the phone but if I am prevented from leaving the land of the *kuffar* [non-believers] it will be so.” Williams also stated, “We will see when we file for passport []. FBI may come to speak with me.”

On February 18, 2021, Williams contacted CHS-4 (one of the purported ISIS recruiters) via messaging app and stated:



¹⁵ Williams and CHS-2 had a personal relationship through a Seattle area mosque for over one year prior to the beginning of this investigation. CHS-2 became an FBI source in February 2021. CHS-2 has been compensated for expenses. CHS-2 has pending charges in Washington State relating to solicitation of a minor. CHS-2 is hoping to receive consideration regarding the pending state charges, although no promises have been made to CHS-2.

1 In response, CHS-4 asked how Williams was reported to the FBI. Williams
 2 answered, “Long story. But I will have passport ready in few months so I’d like to get
 3 the [ISIS application] approved by then.” When asked about the other “brother,”
 4 Williams answered, “The brother I am giving *dawah* [proselytizing] to, he wants to come,
 5 and he will give *bayah* [allegiance].” Williams elaborated: “He’s the person whom I am
 6 living with in a few days. . . I vouch for him.”¹⁶ CHS-4 asked, “Alright. How serious is
 7 he about this?” Williams answered, “We are getting passports and he is helping me and
 8 supplying me with my passport. So I’d say 100%.” Williams further stated, “He’s with
 9 me now.” At the time, Williams was with CHS-2. As noted above, Williams recently
 10 had begun attempting to convince CHS-2 to travel with him to fight with ISIS.

11 During a conversation on or about February 22, 2021, Williams again told CHS-2
 12 that he needed to obtain a passport. Williams speculated that it would take at least two
 13 months to receive the passport. Williams also said, “I gotta see if the brothers can help
 14 me out with the money for the [airline] ticket.” During the same conversation, Williams
 15 said, “This is what I’m saying man, [if] they prevent me from leaving America, they’re
 16 gonna fucking regret it.” Williams explained that he would prefer to conduct an attack
 17 overseas but would instead conduct an attack in the United States if he is not allowed to
 18 travel abroad. Williams opined that he would be able to kill more people if he goes
 19 overseas, as compared to a local attack that would only kill around 20 people. Williams
 20 also explained that it was easy to get a rifle without registering it. Williams then showed
 21 CHS-2 an explosives-making video and claimed to know how to make explosives,
 22 although he admitted he had never done so before. Williams also told CHS-2 that he
 23 wanted to introduce CHS-2 to his ISIS contacts and would like for CHS-2 to fight
 24 overseas with him.

25 On February 24, 2021, Williams’ mother contacted the FBI to report that Williams
 26 had recently asked her for a copy of his birth certificate. According to his mother,
 27
 28

¹⁶ At this time, Williams was hoping to move in with CHS-2, although that did not happen.

1 Williams said he needed the birth certificate in order to get a passport, and that he would
2 be “leaving with his brothers” in a few months.

3 On February 24, 2021, during a discussion with CHS-2 over a messaging app,
4 Williams expressed frustration about his current life situation. CHS-2 asked how he
5 could help. Williams replied: “Nope literally nothing you can do, I am just going to live
6 here and die here, entirely alone, without a spouse, hated by everybody except a few.
7 Living in this disgusting land of fitnah and temptations.” CHS-2 replied: “I can help with
8 passport, ticket if you want.” Williams stated that he was embarrassed and felt bad
9 because CHS-2 had helped him with so much in the past. CHS-2 replied: “You don’t
10 have to feel embarrassing man. If you want to travel or not, that’s your choice. I am here
11 to help as brother.” Williams responded, “I need and want to get away from here.” CHS-
12 2 asked, “How can I help brother?” Williams stated: “I need money for passport and
13 flight ticket with you to Iraq.”

14 On or about March 1, 2021, Williams participated in an online chat with CHS-4
15 and CHS-5 (the purported ISIS recruiters). Williams stated: “My passport will be ready
16 next month and I will be leaving for Iraq . . . to marry . . . and then probably *Sham* [Syria]
17 a few weeks after.” CHS-5 told Williams that his application had been “pre-approved”
18 by ISIS. CHS-5 further explained that Williams would still need to receive final approval
19 from ISIS and would first “need passport becaus[e] cant fli [sic] without that.” Williams
20 replied: “I will have passport in 1 month or 2 months.” Williams also stated that “there is
21 a brother who I am going to be living with and traveling with who wishes to file [an ISIS
22 application] as well,” referring to CHS-2. Williams then added CHS-2 to the group chat
23 and informed CHS-2 that he (Williams) had been approved for travel by ISIS.

24 On or about March 2, 2021, CHS-2 noticed that Williams had created a new social
25 media account and asked Williams why he had done so. Williams responded, “So I can
26 keep in touch with people when I leave.” During a conversation a few days later,
27 Williams told CHS-2 that his preferred destination for travel was Egypt, to fight for ISIS
28 in the Sinai desert. During the same conversation, Williams reiterated that if the

1 government prevents him from traveling overseas, he would be willing to do an attack in
2 the United States.

3 On March 6, 2021, Williams engaged in an online group chat with CHS-5, CHS-4,
4 and CHS-2. Williams stated that he expected to receive his passport within a month and
5 asked, “When I get my passport [] where am I supposed to travel too [sic]?” CHS-5
6 asked if Williams had a desired location. Williams answered: “I want to travel
7 somewhere with desert, like Sinai.” CHS-5 explained some of the challenges involved
8 with traveling to Sinai, and Williams replied: “Ask [the ISIS leaders] about Sinai, if I
9 cannot go to Sinai I will make a decision between Ethiopia, Somalia, or Indonesia.” The
10 group further discussed the timing of the arrival of Williams’ passport and that Williams
11 would wait to purchase an airline ticket until after the passport arrived. During the
12 conversation, CHS-5 told Williams that he had been communicating on the side with ISIS
13 authorities and that they would approve his travel to Sinai if that was where he wanted to
14 fight. Williams confirmed: “I wish for Sinai.”

15 On March 10, 2021, Williams made an in-person passport application at a post
16 office in Des Moines, Washington. At Williams’ request, CHS-2 drove Williams to the
17 post office and paid for the application (with funds provided by the FBI). Williams
18 arranged for the passport to be mailed to CHS-2 because Williams did not have a stable
19 residence. That same day, in an apparent effort to recruit CHS-2, Williams sent CHS-2 a
20 link to a website containing a large cache of ISIS videos, as well as a link to make
21 donations to ISIS-affiliated causes.

22 On or about March 10, 2021, Williams engaged in a group chat with CHS-2, CHS-
23 4, and CHS-5. Williams told the group, “I will have my passport within 4 to 6 weeks
24 they said, I will send photo of it when it arrives.” He later added, “We may receive it [the
25 passport] sooner than 2 months.” Williams asked, “Where do we go for the training?”
26 When CHS-5 responded, “Sinai,” Williams clarified, “Yes, Sinai, but I need to know
27 where I am supposed to go in Egypt, who will meet us, when he will meet us, things like
28 that.” As the conversation continued, CHS-5 asked, “I told you what others bring for

1 | hijrah?” Williams answered, “No you did not, can you tell me again so I can make a
2 | list.” CHS-5 described a list of items that Williams would need to acquire prior to his
3 | travel, including tactical gear, boots, and other items. Williams responded by sending
4 | pictures of a tactical vest and a solar-powered cell phone charger, asking if they were
5 | suitable. Williams further stated that he wanted to ensure the items he bought were “able
6 | to go on the flight with us, somethings [sic] you cannot take on the airplane.”

7 | On or about March 13, 2021, Williams spoke to CHS-2 about the items he needed
8 | to purchase for his planned trip. Williams said that he intended to sell his laptop
9 | computer, and possibly his cell phone, to help finance his travel. On March 15, 2021,
10 | FBI surveillance agents observed Williams walking into a pawn shop located in Federal
11 | Way, Washington. After Williams departed, agents interviewed employees at the pawn
12 | shop and learned that Williams had, in fact, pawned a laptop computer.

13 | On or about March 20-21, 2021, Williams engaged in an online group chat with
14 | CHS-5, CHS-4, and CHS-2. Williams told the group that he was having trouble
15 | purchasing the items he needed for his trip due to financial issues. Williams also stated
16 | that he expected his passport would arrive “very soon . . . within 3 weeks.” In terms of
17 | the timing of his travel, Williams stated: “I still need clothing, he [CHS-2] needs to pay
18 | off his loan, we need to buy plane tickets.”

19 | During early April 2021, Williams obtained a job at a local food processing plant.
20 | He later told CHS-2, CHS-4, and CHS-5 that he was working for the specific purpose of
21 | raising the funds needed to support his planned trip, including the purchase of necessary
22 | items and an airplane ticket.

23 | On April 4, 2021, Williams had a text message exchange with CHS-2. Williams
24 | stated: “FBI IS AFTER ME APPEARENTLY [sic].” Along with this message, Williams
25 | forwarded an article about an American couple who were arrested at an airport
26 | attempting to join ISIS in Yemen. CHS-2 replied, “Believe me nobody after you, you
27 | just overthinking and don’t believe the rumors.” Williams responded, “Okay, I just don’t
28 | want to find out at the airport and be taken away. If I find out before, I can get approval

1 for an *istshhadi* [suicide] operation here, but I will just take your advise [sic] and ignore
 2 it,” referring to CHS-2’s assurances that nobody was “after” Williams. Williams later
 3 explained that his concern about the FBI came from a recent conversation he had with his
 4 mother, who said the FBI was looking for him. Williams ultimately dismissed the
 5 concern, stating his mother was drunk and there was nothing “real about the FBI story.”

6 In early April 2021, Williams engaged in an online group chat with CHS-5, CHS-
 7 4, and CHS-2. Williams initially contacted CHS-4 asking, “Where do we go, I need to
 8 know so I know how much for the flight ticket.” CHS-4 encouraged Williams to eat well
 9 and stay in shape for the trip. Williams answered, “Too poor, but this is why I have the
 10 job, so I can afford some food and things, buy the ticket, and leave.” Williams then
 11 returned to his earlier question: “We need to know which country or and city to take a
 12 flight too [sic] though. I don’t want to spend any unnecessary time here. . . . I need to
 13 know the location so I know the cost.” Williams later reiterated to CHS-5: “Passport will
 14 come in 2 weeks or more []. I need to know where we must go so I can buy the plane
 15 ticket. I am currently working and need to know how much money I must make to afford
 16 the ticket.” CHS-5 replied: “This is good news. . . . I don’t know the city because
 17 approval has to come once passport comes. . . . It is safe to have 1,000-1,500 amerikan
 18 dollars for flight.” Williams replied: “Okay, well *insha’allah* [God willing] it comes very
 19 soon. It should be here this month.” Williams also stated: “I will be working for around
 20 2 months until I have money for ticket, extra clothing, and to give leftover money to the
 21 *wilayat* [Islamic State] when I arrive.” Referring to Williams’ job, CHS-4 urged, “Don’t
 22 let them talk down to you,” Williams responded:

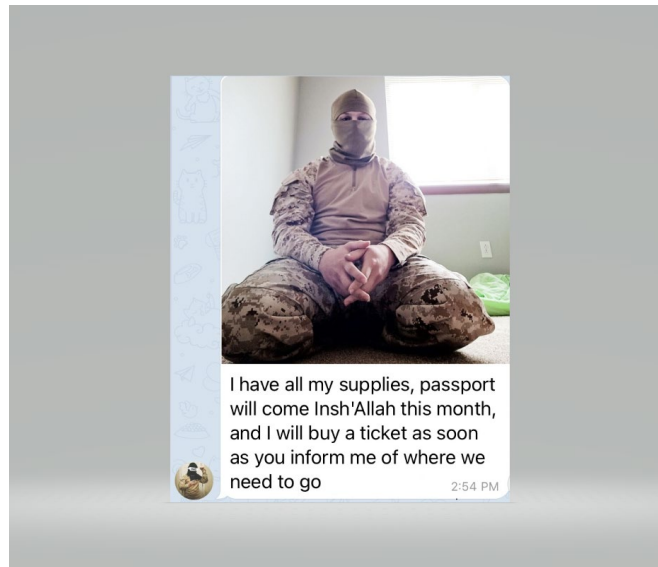
23 I will keep my mouth shut and not
 24 even try to make friends, the only
 25 sign of me being Muslim will be
 26 my breaks for the salah 8:50 PM

27 There's no need to speak with
 28 anybody, in the end I will be
 slaughtering their people inshallah
 anyways 8:50 PM

1 During April 2021, Williams worked steadily. On April 25, 2021, Williams
2 reported to CHS-2 that he had used the funds from his first paycheck to purchase items
3 for his trip. Williams sent CHS-2 the following images of himself in camouflage gear
4 that he had purchased online:

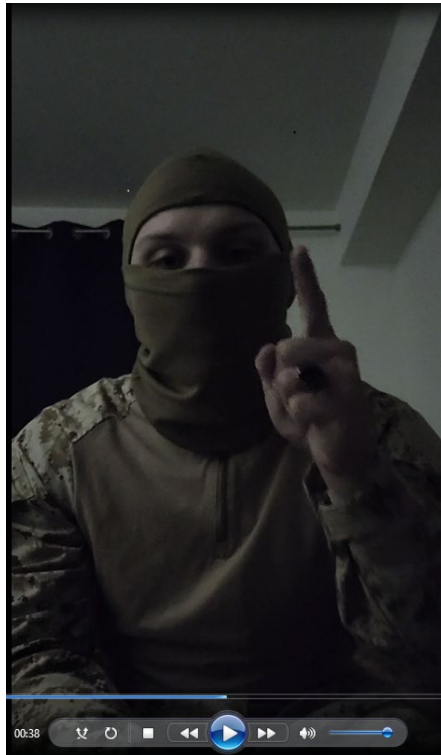


14 On or about April 24, 2021, Williams engaged in an online chat with CHS-5,
15 CHS-4, and CHS-2. Williams sent CHS-5 the below photograph of himself kneeling and
16 wearing military fatigues, with the message below:



27 During the same conversation, Williams stated: “For what better victory in the
28 way of our lord except death,” and included a smiling emoji.

1 On April 26, 2021, Williams met with CHS-2. Williams told CHS-2 that he had
 2 prepared a video and sent it to another person in Kazakhstan to be published online after
 3 he became a martyr. Williams provided CHS-2 with a copy of the video. The video is
 4 approximately one minute in length. A screen capture of the video is shown below, along
 5 with a transcript of Williams' narration:



19 *Have you not forgotten that the Lord said he will punish you for not going*
 20 *forth in the cause of Allah? When you are called to protect your brothers*
 21 *and sisters and your kilafah, you are sitting here posting only words. I*
 22 *want to see your actions. We want to see your actions. Allah (swt) wants*
 23 *to see your actions. Where are you? Where are you, oh mujahideen? . . .*
 24 *Many of you sit here just joking with each other, posting memes, sending*
 25 *videos. Nothing but posers, LARPer [live action role play] and wanna-be*
 26 *mujahideen. Many of you – a great deal of you – I have seen post your*
 27 *daily lives, showing your weaponry and your wealth and your*
 28 *vehicles. Yet, I do not see the blood on them. Why is that? If you are true*
and sincere in what you say, we would hear about such attacks
happening. We would see the blood on your knives, on the bumpers of your
cars, and on the barrels of your guns. So why do we not? Look in yourself
and ask if I am sincere to Allah, or I am just posing for others. Do I live for
the aqeedah or I seek fame and fortune, only in this dunya.

1 On April 26, 2021, Williams spoke with CHS-2 about his recent, unsuccessful
2 attempt to convince one of his friends, who Williams described as having access to
3 firearms, to commit an attack (with Williams) on a Seattle gay pride event. Williams
4 complained that the friend was not agreeing to participate. The relevant portion of the
5 conversation is transcribed below:

6 **Williams:** And this is what I asked him about. “Why don’t we do an *ishtihadi*
7 [suicide] operation.” I already asked him about it before. “Come on do it with me.
8 Let’s go fucking do the gay pride parade in downtown Seattle.” It’s one of the
9 biggest pride parades in the United States. Plus, after COVID hits, there is going
to be tons of people wanting to go to the gay pride parade.

10 **CHS-2:** What’s that pride parade?

11 **Williams:** Where the faggots do their march.

12 **CHS-2:** Pride parade? What is that?

13 **Williams:** Gay pride parade where the faggots they do . . .

14 **CHS-2:** Gay. Ohhhh.

15 **Williams:** And it’s a straight drive! So, if we get a semi-truck, we can drive
16 all the way through the parade and not have to stop once. Literally, [a] semi
17 will go through everything. And then we can get out and shoot (laughs).
18 And I told him about that and I showed him the map and everything. And I
19 was like, “What’s your excuse? Come on man, let’s do it.” And he was
20 like, “No, no I want to make hijrah.” But instead he is getting married and
moving states.

21 **CHS-2:** Does he still talk to you or no?

22 **Williams:** He has blocked me on [social media].

23 **CHS-2:** Ya.

24 **Williams:** You know, this is like I said. For the most part, all these people
25 are being like mendacious. They are just sitting there. You know, I feel
26 like I am one of the only ones that is actually sincere. I don’t want to say
27 they are not sincere in their hearts but if they were sincere in their hearts,
28 they would at least behave like it. So, they just sit there, post memes, and
take everything like a big joke.

Williams Finalizes his Travel Plans

1
2 On May 6, 2021, Williams sent a text message to CHS-2 stating, “I’m a try and get
3 in touch with [CHS-5] about the passport today.” Later that day, Williams’s passport was
4 delivered to CHS-2’s residence. CHS-2 sent a text message to Williams advising him
5 that the passport had arrived. Williams responded, “Send picture,” with a smiling emoji.
6 Williams added, “Send picture akhi so I may send it to [CHS-5].”

7 Later on May 6, 2021, during a group chat with CHS-2, CHS-4, and CHS-5,
8 Williams said: “Passport is here . . . I look super weird in the photo.” Williams then sent
9 a photograph of his passport. Williams told CHS-5: “[I] will have money for plane ticket
10 next Friday [May 14], I have all my supplies ready, now I have my passport.” As the
11 group chat continued, Williams added, “[E]verything is well, I am just ready to leave *dar*
12 *al kuffar* [land of the non-believers]. . . . I can hardly wait, I wish to make my lord smile
13 upon me.” As the others expressed approval, Williams stated: “I wanted to remind I wish
14 to die in the battlefield. I feel slightly uncomfortable with detonating myself as there is a
15 slight disagreement, but if I am told to blow myself up for my brothers and for the sake of
16 Allah I will.” Williams further stated, “I wish to see the kuffar as I kill them, I want to
17 strike terror in them and make Allah pleased for doing so.”

18 Williams then began to discuss the logistics of his upcoming travel: “As I said, I
19 have all the supplies ready, I have the passport, and I will be able to buy a ticket by next
20 Friday. I am just waiting on which country we need to buy a ticket for, and instructions
21 on where to go.” CHS-5 responded, “Where do u want to go *akhy* [brother]?” Williams
22 responded, “Sinai, but I need instructions on which city to travel too [sic], and who I will
23 contact to bring me to the *wilayat* [Islamic State].” CHS-5 asked Williams when he
24 wanted to leave, and Williams responded, “As soon as possible, I will be able to leave
25 and get on a plane in weeks.” Williams continued to ask about the details of his travel:
26 “Do I need to go somewhere specific or I can just fly to Cairo and a brother can bring me
27 to the *wilayat* [Islamic State]?” CHS-5 confirmed that Cairo was an appropriate
28 destination. Williams responded, “I will message you with the date in a few hours.”

1 Approximately three hours later, Williams stated in the group chat, “I am leaving
2 on the 28th. I will arrive May 29th at 11:10 p.m. in Cairo. The airport is Cairo
3 International Airport.” As the group continued to discuss next steps, Williams added,
4 “Okay, the ticket has been purchased, I am ready.”¹⁷ Williams forwarded his travel
5 itinerary to CHS-2. Williams’ flight is scheduled to depart Sea-Tac Airport on May 28,
6 2021, at 1:35 p.m., flying through Amsterdam and Paris, and ultimately to Cairo.
7 Williams selected the date of travel and specific flight itinerary on his own accord.

8 On May 6, 2021, at Williams’ request, CHS-2 drove Williams to get a single-shot
9 COVID vaccine in anticipation of his foreign travel.

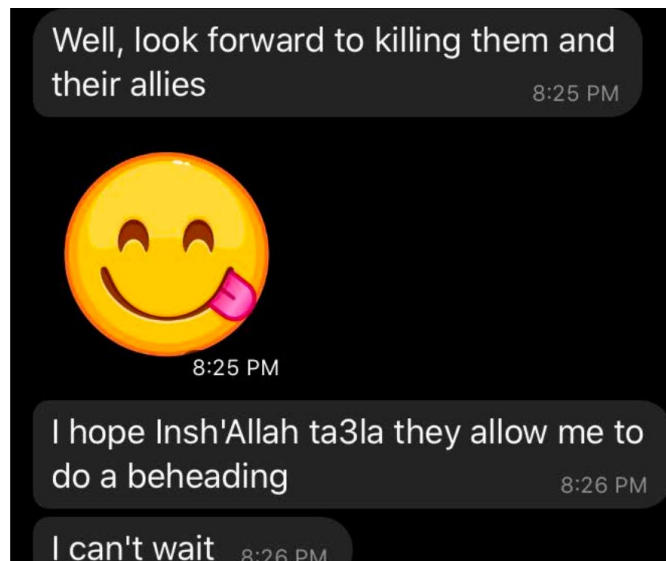
10 On or about May 8, 2021, Williams participated in an online conversation with
11 CHS-5 and CHS-2. Williams confirmed that CHS-2 would be traveling with Williams on
12 the same flight. CHS-5 advised Williams that the ISIS contact in Cairo was aware of
13 Williams’ itinerary and would be at the airport to meet them upon arrival. CHS-5 also
14 told Williams to “look like a tourist” when he travels and to tell Customs that he is
15 “going to visit pyramids.” CHS-5 said he would provide further details closer to the date
16 of travel.

17 On or about May 9, 2021, Williams told CHS-2 that he planned to give his
18 employer notice that he would quit his job in two weeks. Williams said he already paid
19 his friend \$200 for a portion of the cost of his airplane ticket to Cairo and that he still
20 owed the friend \$780. Williams further stated that after he receives his final paycheck,
21 he would be able to pay the friend in full. That same day, CHS-2 received a text message
22 from Williams asking if CHS-2 was excited about their upcoming travel to Cairo. CHS-2
23 stated that he was excited, and asked: “How about you?” Williams replied: “I am very
24 excited, just think I may get detained at the airport.”
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28 ¹⁷ Although his initial remarks during the group chat suggested that Williams intended to wait until May 14 to buy his plane ticket, Williams later explained to CHS-2 that he convinced a friend to allow him to use the friend’s credit card to purchase the plane ticket, promising to reimburse the friend. As a result, Williams was able to buy the ticket earlier.

1 On May 13, 2021, Williams and CHS-2 discussed how early they should arrive at
 2 the airport on May 28th. Williams said, “Let’s go five hours early, I don’t want to run
 3 into trouble.” CHS-2 agreed, and then Williams stated, “Especially if the FBI wants to
 4 come and speak, it could take hours.” Williams then suggested that they get a motel
 5 room the night before the flight, explaining, “[We] go there the day before and just go,
 6 walk into the airport.” CHS-2 agreed to this plan.

7 On or about May 17, 2021, Williams and CHS-4 engaged in a conversation via
 8 encrypted messaging app. Williams said he was at the gym with his roommate and
 9 added, “We are standing around here and I look like I’m ready to bomb the place.
 10 Hahahahaha.” CHS-4 commented, “My stomach is turning . . . stupid ass Israelis just
 11 angers me.”¹⁸ Williams answered:



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 21 Williams added, “I make sincere *dua* [prayer] you can leave to serve your lord
 22 soon . . . May Allah reward us both, and both grant us *shuahdah* [martyrdom].”

23 On May 19, 2021, Williams met with CHS-2. Williams told CHS-2 that he was
 24 excited to travel to Sinai and was counting down the days. Williams explained that the
 25 friend who paid for his plane ticket “knows 100%” why Williams is travelling overseas,
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28 ¹⁸ This was a comment about the ongoing military clashes between Hamas and the State of Israel that began in May 2021.

1 and that he is the only one whom Williams had told about his plans to travel to join ISIS.
2 Williams told CHS-2 that when they arrive in the Sinai, they will likely be sent to
3 Palestine/Gaza to fight with the Palestinians due to current events. Williams also advised
4 CHS-2 to watch a You Tube video on how to assemble and disassemble weapons, stating
5 that would likely be their first type of training at the ISIS training camp.

6 On May 22, 2021, Williams met with CHS-2. CHS-2 asked Williams if he
7 planned to say goodbye to any family members or friends prior to his travel, or whether
8 he planned on just “disappearing.” Williams said that he planned to say goodbye to his
9 mother. Later in the conversation, Williams expressed concern that he was “a little bit
10 suspicious” of CHS-5 and explained some of his reasons, including that CHS-5 allowed
11 Williams to choose his own destination of travel (Sinai). Among other things, Williams
12 expressed the concern that: “In the U.S. [law enforcement] can do anything they want. ...
13 This is why they make you hijrah, fake hijrah, and then they put you in the prison, where
14 you stay. . . . That’s why they built Guantanamo Bay outside of the U.S. They didn’t
15 put it, the prison, where they can keep the terrorists inside the U.S. Otherwise, they
16 would have to follow the law of the U.S.” In response, CHS-2 told Williams that CHS-5
17 seemed “legit.”

18 During the same meeting, Williams and CHS-2 watched several violent ISIS-
19 related videos that Williams accessed over the internet. While they viewed the videos,
20 Williams stated, “Man, I really want to behead the, they make me executioner.” CHS-2
21 asked, “You want to beheading people? Are you full okay with that? Are you okay with
22 blood?” Williams replied, “Yeah, 100%, man. . . . But, yeah, I really want to. Like, I
23 don’t want to do *ishtihadi* [suicide attack]. I don’t want to, you know. . .” CHS-2
24 finished Williams’s sentence with: “Bomb yourself?” Williams replied, “I would prefer
25 to kill them.” CHS-2 asked, “Is it like beheading?” Williams responded, “Either way, it
26 doesn’t bother me.”

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1 On or about May 23, 2021, Williams participated in an online conversation with
2 CHS-5 and CHS-2. Williams told CHS-5 that he had “been working out again and trying
3 to get prepared for the training camp.” Williams reaffirmed, “I am ready.” CHS-5
4 advised Williams: “This is the time some brothers choose to back out. I want to make
5 sure you know that if u decide not to make hijrah it is no problem. Need to make sure u
6 are fully committed now.” Williams replied: “Back out? Never, why would I back out of
7 attaining *jannah* [eternal paradise]? There is nothing greater than fighting and dying in
8 the cause of Allah.” CHS-5 directed the same question to CHS-2, who replied, “I won’t
9 say no to [CHS-5].” CHS-5 then gave Williams specific instructions on how to navigate
10 through the airport in Cairo and meet up with the ISIS contact. Williams sent a
11 photograph of himself (with his face obscured) and stated, “This is what I will be
12 wearing.” The photo depicted Williams wearing a t-shirt and blue jeans, consistent with
13 the prior instructions he received from CHS-5 to “look like a tourist.”

14 On or about May 24, 2021, Williams participated in an online conversation with
15 CHS-5 and CHS-2. CHS-5 provided Williams with further instructions on how to meet
16 up with the ISIS contact at the Cairo airport. CHS-5 also confirmed that Williams had
17 final approval from ISIS leadership for “hijrah.” Williams replied: “[T]hank you so
18 much brothers [heart emojis]. You do not understand how happy I am rn [right now]?”
19 CHS-5 instructed Williams that he should not have any further communications with
20 CHS-5 or CHS-4 prior to his travel unless there was an emergency.

21 On May 25 and 26, 2021, Williams visited with his mother. Afterwards, Williams
22 explained to CHS-2 that he (Williams) told his mother that he was going on a trip to
23 Egypt to “see the pyramids” and would be returning home several days later.

24 On May 27, 2021, at approximately 8:30 p.m., Williams and CHS-2 checked into
25 a motel nearby Sea-Tac Airport, as Williams previously had suggested. While at the
26 motel, Williams viewed an ISIS video over his smartphone and discussed the upcoming
27 trip with CHS-2. Among other things, they discussed how difficult the ISIS training
28 camp would be, with CHS-2 commenting, “Maybe they’re gonna test us there.”

1 Williams stated, “I already told them what I want to do.” CHS-2 replied, “Yeah, but
 2 that’s gonna be different because it’s gonna be face-to-face. It’s not like messaging.”
 3 Williams stated, “I just want my lord to smile upon me.” CHS-2 asked, “How’s that
 4 gonna happen, man?” Williams replied, “Through my death, *Inshallah* [God willing].”
 5 CHS-2 asked Williams who his “biggest enemy” would be, and Williams replied: “The
 6 firmest of believers, you will find them, they have the most animosity towards the Jews.”
 7 Williams later commented: “I finally don’t have to act socially acceptable.”

8 **The Arrest of Williams at Sea-Tac Airport**

9 On May 28, 2021, Williams, accompanied by CHS-2, went to Sea-Tac Airport
 10 consistent with his travel plans. Williams checked in for his flight to Cairo and was
 11 arrested at approximately 1:00 p.m. after he presented his boarding pass at the gate and
 12 attempted to board the flight.

13 FBI agents advised Williams of his *Miranda* rights. Williams waived those rights
 14 and agreed to speak with the agents. During the post-arrest interview, Williams
 15 identified himself as a member of the “Islamic State” (ISIS). Among other things,
 16 Williams stated that it was his “obligation” to do “hijrah” and to travel to a country that
 17 practices Sharia law. When asked by agents what his role was going to be when he
 18 arrived, Williams stated that he would be an “executioner” or a “machinegunner.” Later
 19 during the interview, Williams stated: “My intent was to make hijrah. It doesn’t matter
 20 what you guys do to me. I get rewarded for it.” Williams further stated, “Dude, you
 21 either leave – it’s hijrah or jihad – or prepare explosives here.” Williams explained: “I
 22 want to die. We love our deaths more than you love your lives.” Williams also said that
 23 his only message to the U.S. government was: “Go to hell.”

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Conclusion

Based upon the foregoing and my training and experience, I respectfully submit there is probable cause to believe that Elvin Hunter Bgorn Williams committed the offense set forth above in this Complaint.



DAVID NARRANCE
Special Agent, Federal Bureau of Investigation

The above agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit on the 28th day of May, 2021. Based on the Complaint and the sworn statement, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.



BRIAN A. TSUCHIDA
Chief United States Magistrate Judge

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