

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America
v.
CHRISTOPHER RAYMOND JOSEPH

Case No. 8:22MJ2190JSS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 5, 2022 in the county of Hillsborough in the Middle District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. §§ 1512 (c), 1519

Offense Description
Altering, destroying, mutilating or concealing a record, document, or other object, or attempting to do so, with the intent to impair the object's integrity or availability for use in an official proceeding and destruction, alteration, or falsification of records in federal investigations.

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Signature of Deana M. Jones

Complainant's signature

Deana M. Jones, Special Agent

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3)

Date: 12/7/2022

Signature of Julie S. Sneed

Judge's signature

City and state: Tampa, Florida

JULIE S. SNEED, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Deana M. Jones, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since September, 2019. I am currently assigned to the Tampa Field Office in Tampa, Florida. My duties with the FBI include the investigation of alleged violations of federal criminal statutes involving providing material support to foreign terrorist organizations, as well as general financial crimes. I have received training and experience in numerous methods of investigation, including, but not limited to, searches and seizures, electronic and visual surveillance, general questioning of witnesses, and the use of confidential sources. As a result of my experience, I am familiar with the tactics, methods, and techniques of criminal and terrorist networks and their members, including their use of computers, cell phones, social media, email, and other forms of electronic communication, in relation to their criminal activity.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, witnesses, and agencies. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant. It does not set forth all of my knowledge, or the knowledge of others, about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, I respectfully submit that there is probable cause to believe that violations of Title 18 United States Code, §1512 (c) (altering, destroying, mutilating or concealing a record, document, or other object, or attempting to do so, with the intent to impair the object's integrity or availability for use in an official proceeding) and Title 18 United States Code, §1519 (destruction, alteration, or falsification of records in federal investigations) have been committed by Christopher Raymond JOSEPH ("Joseph").

JURISDICTION

4. Title 18 U.S.C. §1512 (c) makes it illegal to corruptly alter, destroy, mutilate or conceal a record, document, or other object, or attempt to do so, with the intent to impair the object's integrity or availability for use in an official proceeding; or otherwise obstruct, influence or impede any official proceeding, or attempt to do so.¹

5. Title 18 U.S.C. § 1519 prohibits the knowing destruction, alteration, or falsification of records in federal investigations, with the intent to impede, obstruct, or influence the investigation.

¹ Title 18 USC § 1512(f)(1) states that "an official proceeding need not be pending or about to be instituted at the time of the offense."

PROBABLE CAUSE

6. The FBI's Tampa Division is investigating charges surrounding tampering and destruction of records in a federal investigation committed by Christopher Raymond Joseph ("Joseph"). Joseph is 18 years old and currently enrolled at the University of South Florida in Tampa, Florida. Specifically, on or about November 5, 2022, Tampa agents interviewed Joseph concerning an individual in another federal district, with whom Joseph had communicated on an encrypted messaging application [Application-1²] concerning the commission of violent acts against synagogues and Jewish individuals. As I discuss in detail below, the FBI has learned that Joseph deleted a record of Application-1 messages between himself and the other individual, during the investigation of that individual, with the intent to impede, obstruct, or influence the investigation and future official proceedings, including criminal proceedings involving Joseph and the other individual, and with the intent to impair the record's availability for use in such official proceedings.

An FBI Investigation

7. On or about November 3, 2022, FBI agents in another federal district began conducting an investigation concerning a violation of Title 18, United States Code, § 875 (interstate communications with threat to injure) committed by an

² Joseph utilized several different social media applications. I have anonymized the names of the social media applications to protect the ongoing investigative effort.

individual (Defendant-1), based on threats he had made online to conduct a violent attack against Jewish individuals or synagogues in the United States.

8. On or about November 4, 2022, law enforcement conducted a consensual search of Defendant-1's phone, which revealed that on or about November 1, 2022, Defendant-1 had used a social media application [Application-2] to communicate with another user of Application-2 [Individual-1], and Defendant-1 referred to a document that Defendant-1 had been writing. Defendant-1 told Individual-1, "I actually started writing it a long time ago. If you want I will link it. It's in the context of an attack on Jews." Shortly thereafter, Defendant-1 sent a link to a document entitled "When Swords Collide" (the "Document"). In an interview with law enforcement on or about November 4, 2022, Defendant-1 admitted that he had drafted the Document and had sent it to Individual-1. Defendant-1 further stated that he believed Individual-1 wanted to read the Document.

9. During the same interview, Defendant-1 claimed that he drafted the document while LARP-ing³. He claimed that he had imagined being al-Qaeda and carrying out an attack. He further claimed that he had written the Document in the first person in the context of being a leader.

10. When Defendant-1 was asked if he would carry out an attack if he had his own money and did not live with his parents, he claimed that he would not.

³ Defendant-1 had previously described "LARP-ing" as live-action role playing and described a chat group where he claimed individuals were "LARP-ing" as terrorists/jihadis.

When asked if the Document was real or fake, he replied that part of it was real, but then he claimed that it was fake.

11. After the interview with law enforcement on or about November 4, 2022, Defendant-1 was voluntarily transported to a hospital for examination. Defendant-1 told a hospital employee that he had told a person he believed to be in al-Qaeda that he (Defendant-1) had plans to blow up a synagogue, but he did not know if it was going to be in a day, a week, or year. He further told the hospital employee that although some things he said on social media were a joke, he was not joking about wanting to plan an attack on a synagogue.

12. On November 10, 2022, Defendant-1 was charged by Complaint in a United States District Court with violating Title 18, United States Code, § 875 (interstate communications with threat to injure). An arrest warrant was issued, and FBI agents arrested Defendant-1 that same day.

Communication between Defendant-1 and "CJ"

13. The consensual search, as well as the search of Defendant-1's phone pursuant to a court-authorized search warrant showed that, on or about October 29, 2022, he had sent a message via an encrypted messaging application [Application-1]

to another individual identified as "CJ": "I got messaged by AQ⁴ trying to explain to the guy that I can't go and attack but he's urging me to....TTP⁵ recruitment."

14. Defendant-1 also sent "CJ" a screen capture of a message he had received on social media from an individual [Individual-2], which said, "brothers told me u will @ttck in US." Defendant-1 responded: "Yeah, so basically about 2 months ago I told [Individual-3] and [Individual-4] that I was planning an attack but it's gonna take me years to prepare for it because I don't have items and my parents do not like guns. I said I could be targeting a synagogue or gay night club. And this would be AQ affiliated attack."

15. During the law enforcement interview of Defendant-1 on or about November 3, 2022, he identified an individual known as "CJ" in Florida with whom he communicates via Application-1. Defendant-1 said that he knew "CJ" was in Florida, because "CJ" got a week off from school for the most recent hurricane in Florida.⁶

16. Defendant-1 stated that "CJ" is "LARPing" as an ISIS supporter or al Qaeda (AQ) sympathizer. He said that "CJ" was not Muslim, but was considering converting soon, and that "CJ" spoke Arabic.

⁴ Based on my training and experience, and the facts of this investigation, I understood Defendant-1 to be referring to al Qaeda as "AQ."

⁵ Based on my training and experience, "TTP" is believed to reference "Tehrik-e Taliban Pakistan," which is a group of militant Taliban networks formed to oppose the Pakistani military.

⁶ Hurricane Ian hit portions of the State of Florida in late September 2022.

17. Law enforcement played a voice message that “CJ” had sent to Defendant-1 on the encrypted messaging application, in which Defendant-1 said that “CJ” was speaking Arabic with a Syrian dialect, but Defendant-1 did not know if “CJ” was a native speaker. Defendant-1 said that he thought one of “CJ”’s parents was “white.”⁷

18. Defendant-1 said that “CJ” also uses a social media application [Application-3], and “CJ”’s handle is “karabogachris”. Defendant-1 said that he and “CJ” would occasionally accuse the other of being a federal agent.

Identification and interview of “CJ” [Christopher Raymond Joseph]

19. On November 4, 2022, FBI Tampa submitted a request for records to Application-3 pursuant to Title 18 United States Code, § 2702 (Voluntary disclosure of customer communications or records) for records associated with the handle “karabogachris.”

20. Records dated on or between November 1 through 4, 2022 revealed a telephone number, internet protocol address, and latitude/longitude location data for the user in the vicinity of the University of South Florida (“USF”) in Tampa, Florida.

21. Telephone-provider records dated November 4, 2022, revealed an authorized user by the name of “Christopher Joseph,” as well as location data in the vicinity of USF.

⁷ The individual later identified as “CJ”’s mother is of Syrian descent, and his father is white.

22. On or about November 4, 2022, Tampa FBI agents contacted the USF Police Department (“USF PD”) to make contact with Joseph. A USF PD Sergeant called Joseph’s telephone number to conduct a welfare check on Joseph.

23. At approximately 12:12 AM on November 5, 2022, Joseph came to the USF PD station on campus. The FBI agents identified themselves, explained that they had received information about a threat, and they asked to speak with Joseph about his social media activity. Joseph voluntarily agreed to speak with agents.⁸

24. Joseph disclosed to the FBI agents several, but not all, social media and messaging accounts he utilized.⁹

25. Joseph relayed that he was in several Application-1 channels, and that he used Application-1 for “LARPing” and/or talking about “racist stuff.” He also said that he follows pro-ISIS channels, and he views videos encouraging others to join ISIS.¹⁰

26. After speaking to the agents for approximately 42 minutes, Joseph voluntarily agreed to take the agents to his dorm room to view contents on his phone. While walking to the room, Joseph stated, “I know it’s illegal to provide financial support and post threats. Are being in these groups and looking at that stuff illegal?” Agents told Joseph that looking at content was not illegal.

⁸ The interview took place in an open conference room, where Joseph was shown the exits, and offered water.

⁹ Joseph provided the usernames for his accounts, to include username “karabogachris” for Application-3 as identified by Defendant-1.

¹⁰ Joseph stated that he believes ISIS is “bad because they kill innocent people”.

27. Joseph and the agents got to his room at approximately 12:54AM. Joseph went in his room, while agents waited in the hallway, and Joseph retrieved his phone. Agents suggested they go to the common area they had passed on the way to his room to continue their interview. Joseph agreed. While walking down the hall to the common area, one of the interviewing agents observed Joseph immediately open Application-1 and appear to delete the most recent thread.¹¹

28. The interview continued in the common area of the dorm. Joseph agreed to allow agents to view the content on his phone. Joseph unlocked his phone and put it in the middle of the table where Joseph and agents sat. Joseph would voluntarily click and open applications as agents asked questions about particular applications.

29. One of the interviewing agents read a portion of a message from a thread out loud from Application- 1 on Joseph's phone. The message referenced an individual who was going to travel to Afghanistan to join "AQ" and commit jihad.

30. Shortly after these messages were observed and read [in the presence of Joseph], Joseph stated that he did not want agents to look at his phone anymore. Joseph signed a Consent to Search form that formalized his earlier verbal consent for the agents to look at his phone, and then he terminated the interview at approximately 1:19AM.

¹¹ Joseph was further interviewed in a common area in the dormitory building. During the interview, Joseph exited to get a drink of water, and he appeared nervous and shaking.

31. As Joseph got up from the table in the common area, agents asked Joseph not to delete anything. Joseph left the common area and went back to his room.

32. At approximately 1:20AM on November 5, 2022, agents left the common area of the dorm and a supervisory agent who was nearby picked them up in his vehicle. The agents drove to the parking lot adjacent to the USF PD station. At approximately 1:38AM on November 5, 2022, surveillance camera footage shows that Joseph exited his dorm. Several minutes later, agents observed Joseph running by their vehicle in the direction of the USF PD station. The agents stepped out of their vehicle and asked if Joseph was looking for them. Joseph stated that he wanted to cooperate and tell them about [Defendant-1], who he identified only by first name.

33. Joseph described [Defendant-1] as residing in another state. He said that he and “[Defendant-1]” began chatting on a social media platform [Application-4] approximately a year and a half ago. [Defendant-1] created a chat and channel, and he invited Joseph.¹²

34. Joseph stated that he and “[Defendant-1]” chatted about various topics, and “[Defendant-1]” “slowly became radicalized.” “[Defendant-1]” also made a comment about an ISIS attack in Iran, and how “these people got what they deserved.”

¹² “[Defendant-1]” was later identified as Defendant-1, the individual charged by complaint in another federal district court.

35. Joseph told the agents that “[Defendant-1]” was planning an attack and wanted to do this attack within five years [of when he first started talking about the attack], possibly at a church. Joseph said that he never thought “[Defendant-1]” was serious about conducting an attack.¹³

36. One of the interviewing agents asked Joseph if “[Defendant-1]” was the account user for the message from the Application-1 thread that the agents had seen and read out loud in his presence. Joseph stated that “[Defendant-1]” was the user who had sent those messages.

37. Additionally, Joseph showed agents the entirety of messages from Application-1 on his phone, and the messages between Joseph and “[Defendant-1]” that the agent had previously read aloud were no longer on Joseph’s phone.

38. One of the agents asked Joseph why he had deleted Application-1 messages with Defendant-1, and Joseph stated that he had deleted those communications between himself and “[Defendant-1]” because he “did not want to get in trouble.” Joseph had apparently deleted the Application-1 communications during the approximately 19-minute window when Joseph terminated the interview in the common area of the dorm and before he approached agents again in the parking lot.

39. Joseph stated that he had attempted to call “[Defendant-1]” [on Application-3] 28 minutes earlier and that “[Defendant-1]” did not answer the

¹³ Joseph said he last had contact with “[Defendant-1]” on 4 November 2022.

[Application-3] call. Agents viewed [Application-3] on Joseph's phone, and Joseph attempted this call at approximately 1:24AM, which was roughly five minutes after Joseph had terminated the interview with agents in the common area of his dorm and before he had told agents that he wanted to tell them about "[Defendant-1]."

40. Joseph said that "[Defendant-1]" never asked him to do anything or help him conduct an attack, but he said that "[Defendant-1]" had made a "manifesto" and had sent a link to it [in Application-4].¹⁴

41. Joseph signed another Consent to Search form and allowed agents to seize his phone to be searched. Joseph voluntarily provided agents with his PIN for his phone.

42. Joseph agreed to allow agents to walk with him back to his dorm. They arrived at his room at approximately 2:05AM. Agents asked if they could quickly look in his room to make sure there were no weapons. Joseph allowed one agent in his room to search his personal belongings. No weapons were located. At approximately 2:07AM, agents left USF and took Joseph's phone back to the Tampa FBI office.

¹⁴ The FBI obtained a federal search warrant for Defendant-1's Google account independent from the information Joseph provided. The FBI also took photographs of the Google document titled, "Al-Qitaal" on Defendant-1's phone.

Second Interview of Joseph regarding "[Defendant-1]"

43. Later in the day, at approximately 6:52PM on November 5, 2022, FBI agents conducted another interview of Joseph in his dorm common area and returned his cell phone to him.

44. Joseph decided to join Application-4 when he saw an individual [Individual-3] on another social media platform [Application-5] with a link to Application-4 in the biographical section of the Application-5 profile. Joseph said that Individual-3 made funny videos, and that he had met "[Defendant-1]" on the Application-4 server through Individual-3.

45. Joseph further said that "[Defendant-1]" had first initiated contact with him on Application-4 in or around August 2021, likely in the form of a message with a "waving robot." Joseph did not think that "[Defendant-1]" supported ISIS at the time, but he was friends with people who supported ISIS. During this conversation about ISIS, Joseph said that "[Defendant-1]" would also debate others on Application-1 regarding ISIS.

46. Joseph thought that "[Defendant-1]" had made a "manifesto" on Google Docs, and that he had put the manifesto on Application-4, which had a display picture for the group chat of a person wearing a black ski mask against a red background. Joseph thought that the "manifesto" was viewable to the public.

47. Joseph said that the document contained a mention of Omar Mateen¹⁵, as well as expressions of hate toward Hindus, Christians, and Jews. The document also mentioned terrorism, and “[Defendant-1]’s” desire to conduct a terrorist attack in ten years.

48. Joseph said that he did not download the document, and he “ghosted” the server. Joseph said that “[Defendant-1]” still has the Google Docs document, because “[Defendant-1]” told him approximately two weeks or a month ago that someone had asked permission to view it.

49. During this interview of Joseph, on the evening of November 5, 2022, he also told agents that he had only deleted the [Application-1] messages with “[Defendant-1]” from the previous day. He denied that “[Defendant-1]” had made any threats in the messages that he [Joseph] had deleted, but he said that he had deleted the messages because he was embarrassed.

Review of Defendant-1 and Joseph’s phones and deleted messages

50. On November 5, 2022, FBI agents performed a digital extraction of the contents of Joseph’s cellphone.

51. All Application-1 messages on Joseph’s phone were reviewed, and messages between “[Defendant-1]” and Joseph, including those that the agents had previously seen during the initial interview in his dorm, were not present on the

¹⁵ Omar Mateen was a mass murderer who conducted a terrorist attack at Pulse nightclub in Orlando, Florida on June 12, 2016, where he shot and killed 49 people and wounded 53 others.

extraction of Joseph's phone. Application-1 was still present on Joseph's phone and messages with other individuals were present on the device, to include group messages between Joseph, "[Defendant-1]", and other individuals.

52. Tampa FBI agents later reviewed photographs taken from Defendant-1's phone of Defendant-1's Application-1 messages with Joseph. The photographs included the same Application-1 messages that the agents had observed on Joseph's phone in Joseph's presence during the initial interview on November 5, 2022, prior to Joseph deleting them.

53. Agents observed the following communications between "CJ" and Defendant-1, dated October 15, 2022, in Application 1 on Defendant-1's phone (as noted above, agents did not find this communication on the extraction of Joseph's phone):

Defendant-1: Muslims who are anti-gun are retarded.

Defendant-1: My mother is anti-gun and she hates the idea of me owning a gun

Defendant-1: Because according to her "Allah chooses when and where we die not us" yea because me owning a gun is definitely going to change the attributes of Allah

Joseph: Arm da people

Defendant-1: Fax

Joseph: She will be safer with a gun

Defendant-1: Since she's a women she can't get that through her head

Defendant-1: Idc one I move out first thing I'm doing is buying a gun idc if she's mad

Joseph: I want to get a concealed carry permit

Defendant-1: What do you think is good for a first gun?

Joseph: Don't you need to be 21 for a pistol??

Defendant-1: Only in Texas

Joseph: I've always liked the ideas of shotguns over rifles

Defendant-1: [Sends a file]

Joseph: I think it's the same here

Defendant-1: What?..

Defendant-1: I am going to ask my law teacher on Monday

Joseph: [Sends a picture]

Defendant-1: In NJ??

Defendant-1: Too

Joseph: [Sends a picture]

Defendant-1: I am using for target shooting

Defendant-1: Idk if there are shooting ranges in my area

Joseph: What are you thinking about buying

Defendant-1: Alr well first of all before I brainstorm that I wanna brainstorm what I don't want to buy

Defendant-1: I want my money to be distant from the Uzi or any Israeli guns

Defendant-1: Russian guns I don't mind purchasing

Defendant-1: Like Klashinkov

Joseph: Yeah they are unreliable

Joseph: Russian guns used to be cheaper but each year the parts and guns are getting more and more expensive

Defendant-1: How come?

Joseph: Idk I guess they aren't making as much anymore and a lot are imported

Joseph: Everyone now has an AR

Joseph: So the ammo is like 25 cents a round

Defendant-1: Yeah that's understandable

Joseph: For .223

Defendant-1: I might get a pump shotgun

Defendant-1: As first one

Joseph: [Sends a picture]

Joseph: 40 cents as the cheapest

Joseph: Damn

Defendant-1: Woah

Defendant01: Ok let's be honest

Defendant-1: The only reason we know about guns and the difference of them because of the games we played when we weee kids

Joseph: [Sends a picture]

Joseph: True and YT

Defendant-1: 1000 rounds

Defendant-1: Holy shit

Defendant-1: Yk the guy who killed children in Texas

Defendant-1: His had 375 rounds

Review of Joseph's phone revealed that, on or about October 15, 2022, Joseph had conducted internet searches regarding the requirements to purchase a firearm in Florida and Defendant-1's home state. Joseph also searched for ammunition, specifically 7.62x39 and 223 ammunition, on the Lucky Gunner website. Screen captures of these searches were found in the documents section of Joseph's phone. The FBI assesses that these were the images Joseph shared with Defendant-1. According to open sources, 7.62x39mm ammunition is widely used due to worldwide proliferation of Russian SKS and AK-47 pattern rifles. .223 ammunition is a small-caliber, high-velocity rifle round. There are a variety of rifle manufacturers producing guns chambered in these cartridges, including everything from the AR platform to bolt-action rifles.

Review of Joseph's Twitter Account

54. FBI personnel conducted a review of Joseph's publicly available Twitter page on approximately November 6, 2022. The header photo, also known as the banner, is of several individuals in camouflage clothing with their faces covered, holding weapons.

55. On November 2, 2022, prior to being interviewed by the FBI, Joseph posted a tweet replying to two other individuals stating, "As an ISIS recruiter I ask

you to remove all your songs from different platforms before serious consequences happen.”

56. On November 6, 2022, after being interviewed by the FBI, Joseph posted a tweet stating, “Oh shit wait did I say that right? What does condone mean?? Do I say do condone or don’t condone??? Whatever New statement- I DO NOT SUPPORT TERRORISM OR ANY TERRORIST GORUP EVERYTHING I SAY ONLINE THAT PROVES OTHERWISE IS BECAUSE THEY WERE JOKES AND I WAS LARPING.”

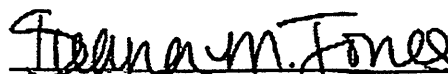
57. Contrary to Joseph’s November 6, 2022, tweet, Joseph’s Twitter account contained pro-terrorism tweets that supported violence against America.

58. On November 9, 2020, Joseph replied to a Twitter user and tweeted “I’m READY” along with a picture of a weapon with a sticker on the magazine of the weapon. This same picture of the weapon appears several other times on Joseph’s Twitter, specifically again on November 7, 2020, where Joseph is replying to another user and tweets “I have guns in my shed.”

CONCLUSION

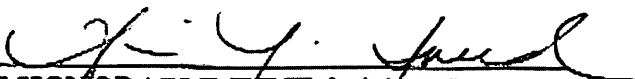
59. Based on the foregoing, there is probable cause to believe that Joseph has committed a violation of Title 18 U.S.C. §§1512 and 1519. Accordingly, I request that the Court issue a warrant for his arrest as to those offenses.

Respectfully submitted,



Special Agent Deana M. Jones
Federal Bureau of Investigation

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) before me this Dec day of 7, 2022.



THE HONORABLE JULIE S. SNEED
UNITED STATES MAGISTRATE JUDGE