

UNITED STATES DISTRICT COURT

FILED

for the Northern District of Ohio

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CLERK U.S. DISTRICT COURT NORTHERN DISTRICT OF OHIO CLEVELAND

In the Matter of the Search of (Briefly describe the property to be searched or identify the person by name and address)

TWITTER PROFILES AMIR AL GHAZI, USERNAME @AMIRALGHAZI76, AND AMIR MUWAHID, USERNAME @MUWAHIDAMIR,

Case No. 1 • 15 MJ 4001

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

SEE ATTACHMENT B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- Evidence of a crime; Contraband, fruits of crime, or other items illegally possessed; Property designed for use, intended for use, or used in committing a crime; A person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 USC Section 2339B(a)(1), CONSPIRING, ATTEMPTING TO PROVIDE, AND PROVIDING MATERIAL SUPPORT TO A FOREIGN TERRORIST ORGANIZATION

The application is based on these facts:

SEE ATTACHED AFFIDAVIT

- Continued on the attached sheet. Delayed notice of days (give exact ending date if more than 30 days) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Ryan A. Presley, Special Agent (Signature and Printed name and title)

Sworn to before me and signed in my presence.

Date: 13 Feb. 2015

Nancy A. Vecchiarelli, U.S. Magistrate Judge (Signature and Printed name and title)

City and state: Cleveland, Ohio

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
TWITTER PROFILES "AMIR AL GHAZI"
(USERNAME "@amiralghazi76"; URL of
<https://twitter.com/amiralghazi76>) and
"AMIR MUWAHID" (USERNAME
"@MuwahidAmir"; URL of
<https://twitter.com/MuwahidAmir>) THAT
ARE STORED AT PREMISES
CONTROLLED BY TWITTER

Case No. **1 : 15 MJ 4001**

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Ryan A. Presley, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with two certain Twitter accounts that are stored at premises owned, maintained, controlled, or operated by Twitter, a social-networking company headquartered in San Francisco, CA. The first, target account #1, is "Amir Al Ghazi," with the corresponding username of "@amiralghazi76," and URL of <https://twitter.com/amiralghazi76>, and the second, target account #2, is "Amir Muwahid," with the corresponding username of "@MuwahidAmir," and URL of <https://twitter.com/MuwahidAmir>. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A)

to require Twitter to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the Twitter accounts.

2. I am a Special Agent with the Federal Bureau of Investigation and, as such, am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws and am within the category of officers authorized by the Attorney General to request and execute search warrants.

3. I have investigated numerous national security cases involving individuals seeking to travel overseas to commit violent jihad and who participated in terrorist fundraising. Additionally, I have completed FBI administered counterterrorism classroom and online training, at the FBI Academy, and at other FBI facilities.

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

5. Based on my training and experience, including five (5) years as a Special Agent with the FBI, as well as the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18 United States Code, Section 2339B(a)(1), Conspiring, Attempting to Provide, and Providing Material Support to a Designated Foreign Terrorist Organization, have been committed by Robert C. McCollum (hereafter referred to as "McCollum"). There is also probable cause to search the information described in Attachment A for evidence of these crimes, as described in Attachment B.

6. This Court is advised that there are items within the Probable Cause section of this affidavit that have been translated from Arabic into English. In each instance, said translations were completed by a qualified FBI Linguist for the purpose of accurately representing the statements made by McCollum. Moreover, for ease of review, the translated material will be limited to that which is enclosed within brackets at the end of each numbered paragraph. Where there are multiple instances of a particular term or phrase, Affiant will only include a translation for the initial occurrence.

JURISDICTION

7. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711, 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States ...that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

8. Title 18, United States Code; Section 2339B states: “Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, shall be fined under this title or imprisoned.... To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization (as defined in subsection (g)(6)), that the organization has engaged or engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), or that the organization has engaged or engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).”

9. On October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (AQI), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization

under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

10. On May 15, 2014, the Secretary of State amended the designation of al-Qaeda in Iraq as an Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias "Islamic State of Iraq and the Levant" (ISIL) as its primary name. The Secretary also added the following aliases for ISIL: the Islamic State of Iraq and al-Sham, the Islamic State of Iraq and Syria (ISIS), ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. ISIL has remained continuously designated since the first designation of AQI in 2004.

11. In January 2015, ISIL released a video via social networking websites advocating lone offender attacks in Western countries. The video contained material from a September 2014 message attributable to Abu Muhammad al-Adnani (spokesperson for ISIL), wherein he advocated for lone offenders in the West to attack law enforcement and military personnel. Additionally, the video contained material from the September 2014 message wherein al-Adnani specifically referenced the targeting of American "disbelievers."

12. Robert C. McCollum is a United States citizen currently living in Sheffield Lake, Ohio. McCollum has an extensive criminal history, including multiple felony convictions for drug trafficking and related weapons charges. McCollum has posted on social media websites that he converted to Islam in 2006 while in prison. On June 18, 2014, McCollum pledged his allegiance to ISIS, also referred to as ISIL, in a Facebook posting on the internet. On June 16, 2014, McCollum had posted a YouTube link to a video entitled, "Stand up and pledge allegiance to Abu Bakr Al-Bagdadi," who is the declared leader of ISIL. A Confidential Human Source

(hereafter referred to as CHS#1¹) posted a comment to this video, inquiring if McCollum was ready to make “bayah,” which translates to “pledge of allegiance.” On June 18, 2014, McCollum responded, stating: “Naam I’m ready to make bayah”. [The term “Naam” translates to “Yes.”]

13. There is probable cause to believe that Twitter profiles, target account #1, “Amir Al Ghazi,” with the corresponding username of “@amiralghazi76,” and URL of <https://twitter.com/amiralghazi76>, and target account #2, “Amir Muwahid,” with the corresponding username of “@MuwahidAmir,” and URL of <https://twitter.com/MuwahidAmir>, are utilized by McCollum. Relevant facts related to McCollum’s use of these Twitter accounts are as follows:

14. On September 30 and October 3, 2013, Affiant conducted interviews with McCollum. On both occasions, McCollum informed Affiant that he intended to legally change his name to “Amir Al Ghazi.”

15. In August of 2014, McCollum informed CHS#1 via Twitter, using target account #1, “Amir Al Ghazi,” that he intended to change his name to “Amir Al Ghazi” or “Amir Muwahid.”

16. Subsequent to these communications, CHS#1 met in-person with McCollum. After that meeting, McCollum utilized target account #1 when continuing to communicate online with CHS#1.

17. McCollum also maintains a historical Twitter profile, “abu sadiq al ghazi,” with the corresponding username of “@abusadiq76,” and URL of <https://twitter.com/abusadiq76>.

¹ CHS #1 is a paid confidential informant, having worked with the FBI for three years. All information provided by CHS#1 to date has been deemed to be truthful and accurate, with no known reliability issues.

This profile contains a publically available image of McCollum and lists his residence as Lorain, Ohio. McCollum's current residence is in Sheffield Lake, Ohio, which borders Lorain, Ohio. For both target account #1, "Amir Al Ghazi," and the "abu sadiq al ghazi" Twitter profiles, the number "76" is used within the usernames ("@amiralghazi76"; "@abusadiq76"). Affiant notes that the date of birth for McCollum is December 8, 1976.

18. Publicly accessible activity on target account #1, Twitter profile "Amir al Ghazi," ceased on December 27, 2014. Target account #2, Twitter profile "Amir Muwahid," was established on December 29, 2014. The content appears to be substantially similar to that observed for target account #1. On January 23, 2015, the user of target account #2, Twitter profile "Amir Muwahid," tweeted that he was "Abu Sadiq Al-Ghazi" and that he was "Amir Al Ghazi." A user photo on the inactive Twitter profile "abu sadiq al ghazi" is of McCollum.

19. Based on these facts and circumstances, your Affiant believes McCollum is the user of Twitter profiles "Amir al Ghazi" (target account #1) and "Amir Muwahid" (target account #2).

20. On December 10 - 12, 14, 16, 17, and 23, 2014, Affiant conducted a review of publicly available information on target account #1, Twitter profile "Amir Al Ghazi." Affiant reviewed available content from the period of July 14, 2014 through December 23, 2014.

Relevant observations in support of referenced statutory violations are as follows:

21. On July 14, 2014, using target account #1, McCollum uploaded an image entitled, "JIHAD THE PATH TO PARADISE". The image depicted a soldier wearing a ballistic vest, a head covering with Arabic script, and holding two (2) semi-automatic handguns.

22. On July 18, 2014, using target account #1, McCollum tweeted, "I support the Islamic State! I am muslim sunni it's wajib!" [The term "wajib" translates to "it is a duty" or "it is my duty."]

23. On August 31, 2014, using target account #1, McCollum tweeted, "Muslims in America jihad for us as well".

24. On September 1, 2014, using target account #1, McCollum tweeted, "America is at war with islam as a muslim in America when do we fight back?"

25. On September 20, 2014, using target account #1, McCollum tweeted, "Al wala wal baraa should be reintroduced to us in America, we need to incite the joy of jihad". [The term "Al wala wal baraa" translates to "allegiance/loyalty (to the Muslim ruler) and the rejection of everything else (other forms of governments)."]

26. On September 21, 2014, using target account #1, McCollum tweeted, "This is the time for unsheathing of swords".

27. On September 23, 2014, using target account #1, McCollum tweeted, "America is worried about IS recruiting, bayah has been given they're too late", "The jammat setting the best example for all of us is fighting:jihad fisabillah right now!", and "We have to fight them we are commanded by Allah to fight". [The term "jammat" translates to "the group or folks"; the term "fighting jihad fisabillah" translates to "fighting for God or sacrificing for the sake of God."]

28. On September 23, 2014, using target account #1, McCollum tweeted a link to a YouTube video entitled, "ISIS Spokesman Calls on Muslims in the West to Kill Americans, Australians, Canadians" (URL of <https://www.youtube.com/watch?v=aGxPYTcBOnI&feature=youtu.be>): This video consists of an audio only speech (in Arabic, with English subtitles) attributed to Abu Muhammad Al-Adnani

(known to be the primary spokesman for the ISIL). Within this speech, Al-Adnani describes United States citizens as “combatant infidels” and advocates the commission of violence, to include murder, against them along with members of law enforcement and the military.

29. On October 3, 2014, using target account #1, McCollum tweeted, “What group of individuals has accomplished what IS has or have implemented sharia and wage jihad against the kuffar? We should follow suit”. [The term “sharia” translates to “Islamic law”; the term “kuffar” translates to “non-believer or infidel.”]

30. On October 7, 2014, using target account #1, McCollum tweeted, “Sharia is established by jihad fisabillah”. [This phrase translates to “Islamic law is established by fighting in the name of God.”]

31. On October 24, 2014, using target account #1, McCollum tweeted, “Jihad in America is inevitable”.

32. On November 5, 2014, using target account #1, McCollum tweeted, “This is a war between iman and kufr”. [The term “iman” translates to “faith or believing in God”; the term “kufr” translates to “blasphemy.”]

33. On November 17, 2014, using target account #1, McCollum tweeted, “I grew up in the ghettos of america, took shahada in prison, was taught tawheed and al wala wal baraa from the start, how is it I support The caliphate and choose to follow the sunnah when more learned people then [sic] me reject and defame the mujahideen?”, and, “I have no singular sheikh I take from ahmad musa jibril, ibn taymiyyah, anwar al awlaki, sheikh bin laden, sheikh bakri”. [The term “shahada” is the Muslim profession of faith that translates to “There is no God but Allah and his prophet is Muhammed”; “tawheed” translates to “believing in one God”; the term

“sunnah” translates to “the way in which the Prophet Muhammad acted and/or instructed others.”]

34. On November 17, 2014, using target account #1, McCollum tweeted a link to a video entitled, “My Ummah, Dawn has appeared|Best Jihadic Nasheed” (URL of <https://www.youtube.com/watch?v=9PVvLpFbxPE>). The video is a musical nasheed (in Arabic, with English subtitles) the lyrics of which appear to glorify the Islamic State, the mujahideen, and the commission of jihad.

35. On November 18, 2014, using target account #1, McCollum tweeted, “Jihad is our only option to establish the law of Allah azza wajjal everywhere”, and, “Join the Islamic State If not represent the caliphate wherever You Are America to Australia. We Are Commanded To Fight Where Are You muslims”. [The term “azza wajjal” translates to “God almighty.”]

36. On November 28, 2014, using target account #1, McCollum tweeted, “May Allah azza wajjal grant us the ability to follow the path of jihad”.

37. On November 29, 2014, using target account #1, McCollum tweeted, “Why are muslims in america scared to say jihad?”, “We need to incite the ummah”, “They might knock on my door but I fear Allah azza wajjal alone!”, “Yes I’m a revert born here to black parents and I’m saying fight the kuffar! Jihad fisabillah is our only way!”, and “Oh ummati unsheathe [sic] your swords!” [The term “ummati” translates to “my people”; the term “ummah” translates to the “Islamic nation.”]

38. On November 30, 2014, using target account #1, McCollum tweeted, “America is the oppressor! Rise up ikhwan”. [The term “ikhwan” translates to “brothers.”]

39. On December 2, 2014, using target account #1, McCollum tweeted, “Incite the ummah to jihad!”

40. On December 3, 2014, using target account #1McCollum tweeted, "Where are the muslims in america? Who will incite the believers to jihad?"

41. On December 6, 2014, using target account #1, McCollum tweeted, "Are there no muslims in america willing to give bayah and support the caliphate? Stand up to the crusaders who are waging war on muslims?"

42. On December 7, 2014, using target account #1, McCollum retweeted an October 29, 2014 tweet from user "RandomGuyWithASuit" ("@AliAlfarsiii"), "Running away from jihad will not save you from death. You can die as a coward or you can die as a martyr".

43. On December 9, 2014, using target account #1, McCollum retweeted a December 8, 2014 tweet from user "GREAT IS NATION" ("@ISWorldPress"), "Message of the Mujahid 5, Abu Anwar al-Kanadi". The tweet contained a video URL of vid.me/E1Kt. Also with the tweet were multiple hash tags, #IslamicState, #IS, #ISIS, #ISIL, and #ISID. Within this video, Canadian citizen John Maguire, identifying himself as "Abu Anwar al-Kanadi," praises the recent terrorist attacks in Canada, states that Canadians have "no right to live in a State of security", states that conducting "jihad in the West" is a religious obligation of every Muslim, and indicates that individuals (in the West) "will be indiscriminately targeted".

44. On December 9, 2014, using target account #1, McCollum tweeted, "The first group of mujahideen that becomes known in America will receive martyrdom probably quickly...#dangeroustweet".

45. On December 9, 2014, using target account #1, McCollum retweeted a December 8, 2014 tweet from user "Umm Imarah" ("@Nameless ukhti"), "It's pretty simple we die or we win".

46. On December 10, 2014, using target account #1, McCollum tweeted, "Is it murder to kill a jew?"

47. On December 12, 2014, using target account #1, McCollum tweeted, "The US enjoys security for now...the Lions are stirring Allahu Akbar".

48. On December 15, 2014, using target account #1, McCollum tweeted, "Disregard race and nationalism, return to your deen, support the caliphate, incite the ummah to jihad!" [The term "deen" translates to "faith or religion."]

49. On December 16, 2014, using target account #1, McCollum tweeted, "I hate the crusaders, who will stand with me?"

50. On December 17, 2014, using target account #1, McCollum retweeted a December 17, 2014 tweet from user "Generation Awlaki" ("@Sh AnwarAwlaki"), "Brothers and sisters, if we are not going to fight today, then when will we fight? Muslim land is occupied, oppression is wide spread, the laws of Quran are neglected, what other time is better for jihad than today?" " - Shaykh Anwar Al Awlaki rahimahullah". [The term "rahimahullah" translates to "May God have mercy on him."]

51. On December 17, 2014, using target account #1, McCollum retweeted a December 17, 2014 tweet from user "Swords State of Islam" (translated from Arabic via Google Translate; "@asd123123199"). The tweet contained Arabic script with a URL link of justpaste.it/IS7 and an image of a handgun with a silencer/suppressor. Affiant accessed the link "justpaste.it/IS7," which revealed a document, written in Arabic and containing multiple diagrams/images, with instructions for the construction of a silencer/suppressor.

52. On December 17, 2014, using target account #1, McCollum tweeted, "A lion without a pride is still a lion".

53. On December 19, 2014, using target account #1, McCollum retweeted a December 19, 2014 tweet from user "Yousef Sawjikhari" ("@yousef97af"), "Imam Anwar Awlaki: 'Running away from Jihad will not save you from death. You can die as a coward or you can die as a Martyr'".

54. On December 21, 2014, using target account #1, McCollum retweeted two (2) December 19, 2014 tweets from user "Miznaur Rahman" ("@Abu Baraa1"). The first tweet consisted of an image of Sheikh Omar Bakri Muhammad² with an attributable quote, "THE 5 AIMS OF SHARIAH [DEEN, LIFE, INTELLECT, PROPERTY, HONOUR], CAN NEVER BE PROTECTED WITHOUT KHILAFAH". The second tweet was also an image of Sheikh Omar Bakri Muhammed with an attributable quote, "WE ALWAYS TALK ABOUT HISTORY NOW IS THE TIME TO MAKE HISTORY (i.e., The establishment of Islam)".

55. On December 22, 2014, using target account #1, McCollum tweeted, "The police enforce the kufr law of man, the mujahideen enforce the divine law of Allah."

56. As of December 27, 2014, no further activity has been observed for target account #1, Twitter profile "Amir Al Ghazi."

57. On January 8, 9, and 14 of 2015, Affiant conducted a review of publically available information on target account #2, Twitter profile "Amir Muwahid." The information observed by Affiant is substantially similar to that as observed within target account #1, Twitter profile "Amir Al Ghazi." Relevant facts are as follows:

² Omar Bakri Muhammad is an Islamist militant leader who was instrumental in developing two radical Islamist organizations based in the United Kingdom, Hizb ut-Tahrir and Al-Muhajiroun. He now routinely utilizes social media to justify the conduct of violent jihad, to include statements made in support of the activities of ISIL. Muhammad has been arrested on multiple occasions, most recently by Lebanese security forces in May 2014 for allegedly supporting terrorism.

58. On December 29, 2014, the user of target account #2 tweeted, “New account”, “Where are the Mujahideen of america?”, and “We must incite the ummah here in america!”

59. On December 29, 2014, the user of target account #2 retweeted a December 29, 2014 tweet from user “sham” (“@ifthimatrix”) which read, @ISLAMIC STATE “The graduation of Caliphate soldiers” and included a video link with the URL of <https://archive.org/details/BilawiCamp>. This video purported to depict the graduation of several individuals as they became soldiers of ISIS.

60. On December 30, 2014, the user of target account #2 tweeted, “Islamic State is our caliphate like it or not”.

61. On January 1, 2015, the user of target account #2 tweeted “So many attacks on the ummah worldwide and still Muslims in america are silent” and “Islamic State citizens are everywhere”.

62. On January 2, 2015, the user of target account #2 tweeted, “I want to incite the Muslims in America to jihad”.

63. On January 4, 2015, the user of target account #2 tweeted, “Here in dar ul kufr there are lions wandering alone who would be mightier in a pride bidhnillah”. [The term “bidhnillah” translates to “the religion or teachings of God”; the term “dar al kufr” translates to “the land or nation of the non-believers.”]

64. On January 4, 2015, the user of target account #2 tweeted, “The coconuts argue the validity of the state, the arrows of kuffar are aimed at us and yet Muslims in america silent? #homegrown”.

65. On January 4, 2015, the user of target account #2 retweeted a January 4, 2015 tweet from user "Invite to truth" ("@invitetotruth1") which read, "Martyrdom is one of the highest statuses before Allah, and the martyrs are the closest of His slaves to Him."

66. On January 4, 2015, the user of target account #2 tweeted a link to a video entitled, "THE VERSE OF THE GUN – Sa'eed Ali" (URL of <https://www.youtube.com/watch?v=H83sCVFaDeY&feature=youtu.be>). The video is over an hour in length, and consists of a lecture from Shaykh Sa'eed Ali regarding various verses from the Quran that he claims justify the killing of "pagans" or the "kuffar." Ali referred to what he called the "Verse of the Sword" and claimed that it refers to "killing pagans." Ali further advocated that Muslims should "chase" and "go after" non-believers until they are "killed" or "embrace Islam", that "fighting is mandated", and that "all is left" for Muslims "is to pull the trigger, so go ahead and feel good about pulling the trigger against the enemies of Allah".

67. On January 4, 2015, the user of target account #2 tweeted, "I would like to get together with Muslims in america upon the same aqeedah." [The term "aqeedah" translates to a "tenet" or "doctrine."]

68. On January 5, 2015, the user of target account #2 tweeted, "How bad do you want paradise?"

69. On January 7, 2015, the user of target account #2 tweeted, "Understand Islamic state has no borders".

70. On January 9, 2015, the user of target account #2 tweeted, "Islamic state in america".

71. On January 9, 2015, the user of target account #2 retweeted a January 9, 2015 tweet from user "Media Studies Center" ("@Censored31") which read, "Bismillah. Some of the

'Lone Wolf Pack' shooters came back from North Syria after airstrikes on "Wolf Brigades". #ParisShooting #ParisWar. [The term "bismillah" translates to "in God's name."]

72. On January 9, 2015, the user of target account #2 responded to a tweet from user "Bearded Elvis" ("@OldCeasarCole"). "Bearded Elvis" asked the question, "I am kuffar. Would you kill me if you could? @MuwahidAmir". User responded with a tweet, "@OldCeasarCole you have 3 choices, become Muslim, pay jizah, or the sword." [The term "jizah" translates to "penalty or tax."]

73. On January 9, 2015, the user of target account #2 responded to a tweet from user "Mujahid Miski" ("@Mujahid_Miski1"). "Mujahid Miski" tweeted, "Ikhwah follow, support and Anger the Kuffars insha Allah." User responded with a tweet, "We will terrorize the kuffar!"

74. On January 9, 2015, user retweeted a January 9, 2015 tweet from user "Islamic Revolution" ("@IslamRevlution") which read, "Breaking News: Their dead are in hell fire Our dead are in Paradise. insha Allah Justice done #JeSuisMuslim".

75. On January 9, 2015, the user of target account #2 retweeted a January 9, 2015 tweet from user "Abu Junaid As Somaal" ("@IbnuTalha") which read, "May Allah Grant you Janatul Firdows, Amiin. this great Mujahid has send 2 kuffar into here so far #CharlieHebdo". Underneath this caption was a news media image of French terrorism suspect, Ahmed Coulibaly. [The term "Janatul Firdows" translates to "the highest level of Paradise."]

76. On January 9, 2015, the user of target account #2 tweeted, "To the kuffarin you are not safe". [The term "kuffarin" translates "the non-believers."]

77. On January 12, 2015, the user of target account #2 responded to a tweet from user "fox8news" ("@fox8news") which read, "Hackers take control of US military's Central

Command Twitter account". In response, user tweeted "baqiyyah!" Affiant notes that News Station Fox 8 Cleveland is the local affiliate for Fox News. [This term literally translates to "the rest of" or "what is left." Within the context of this paragraph, the phrase likely means "We are here to stay."]

78. On January 13, 2015, the user of target account #2 retweeted a link from user "Abu Sayfullaah" ("@Abu Sayfullaah") to a video entitled "Can you join Kuffar army just to get some training | Abu Baraa" (URL of <https://www.youtube.com/watch?v=3PytuH4QDsE&feature=youtu.be>). The video appeared to be a Q & A session with Mizanur Rahman, aka Abu Baraa, who is a British Islamic activist of Pakistani descent. In this video, Abu Baraa addresses the question of whether a Muslim can join a "kuffar army" for the purpose of obtaining military training. The response from Abu Baraa was that this would be impermissible unless the individual had the permission of an "amir" and was only joining for a very short period of time for the purpose of receiving training for a specific jihadi operation. [The term "amir" translates to "commander."]

79. On January 21, 2015, the user of target account #2 and CHS#1 conducted a "direct message" conversation within Twitter, which is not viewable to other Twitter users. Within this conversation, the user made the statements, "Trying to incite Muslims here to jihad"; "They lock us up when we try to make hijra so I think we should unite here and fight the kuffar here"; "We have to unite here"; and "Allah said 20 believers can defeat 200 kuffar". In response to comments made by CHS#1 regarding French terrorists, Said and Cherif Kouachi, this user also stated, "Alhamdulillah I believe that their [sic] in Hannah [sic] in the bodies of green birds. Jannah." This user also disclosed that he has a "wife and kids" and identified his current location, stating "I'm in ohio". Lastly, this user and CHS#1 discussed their difficulties in

obtaining a passport for the purpose of joining the Islamic State, with the user asking the question, "I'm a felon I can't get a passport can I?"

80. The statements within paragraph #79 regarding family members, location, and criminal history provide further evidence that leads your Affiant to believe that target account #2 Twitter profile, "Amir Muwahid," is identifiable with McCollum. Additionally, this paragraph demonstrates McCollum has conducted private "direct message" conversations regarding jihad within Twitter, making it reasonable to assess he has potentially done so with other users.

81. As has been shown by the above referenced "tweets" and "retweets," McCollum has consistently communicated his desire to incite violent jihad within the United States and to recruit or influence other United States citizens to join or align with ISIL.

82. Affiant has requested the United States Attorney's Office for the Northern District of Ohio submit a preservation letter to Twitter to preserve the contents of the referenced accounts. Twitter has acknowledged receipt and confirmed its compliance with the details contained therein.

BACKGROUND CONCERNING TWITTER SOCIAL NETWORKING CAPABILITIES

83. Twitter owns and operates a free-access social-networking website of the same name that can be accessed at <http://www.twitter.com>. Twitter allows its users to create their own profile pages, which can include a short biography, a photo of themselves, and location information. Twitter also permits users create and read 140-character messages called "Tweets," and to restrict their "Tweets" to individuals whom they approve. These features are described in more detail below.

84. Upon creating a Twitter account, a Twitter user must create a unique Twitter username and an account password, and the user may also select a different name of 20 characters or fewer to identify his or her Twitter account. The Twitter user may also change this username, password, and name without having to open a new Twitter account.

85. Twitter asks users to provide basic identity and contact information, either during the registration process or thereafter. This information may include the user's full name, e-mail addresses, physical address (including city, state, and zip code), date of birth, gender, hometown, occupation, and other personal identifiers. For each user, Twitter may retain information about the date and time at which the user's profile was created, the date and time at which the account was created, and the Internet Protocol ("IP") address at the time of sign-up. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access a given Twitter account.

86. A Twitter user can post a personal photograph or image (also known as an "avatar") to his or her profile, and can also change the profile background or theme for his or her account page. In addition, Twitter users can post "bios" of 160 characters or fewer to their profile pages.

87. Twitter also keeps IP logs for each user. These logs contain information about the user's logins to Twitter including, for each access, the IP address assigned to the user and the date stamp at the time the user accessed his or her profile.

88. As discussed above, Twitter users can use their Twitter accounts to post "Tweets" of 140 characters or fewer. Each Tweet includes a timestamp that displays when the Tweet was posted to Twitter. Twitter users can also "favorite," "retweet," or reply to the Tweets of other users. In addition, when a Tweet includes a Twitter username, often preceded by the @ sign,

Twitter designates that Tweet a “mention” of the identified user. In the “Connect” tab for each account, Twitter provides the user with a list of other users who have favorited or retweeted the user’s own Tweets, as well as a list of all Tweets that include the user’s username (*i.e.*, a list of all “mentions” and “replies” for that username).

89. Twitter users can include photographs or images in their Tweets. Each Twitter account also is provided a user gallery that includes images that the user has shared on Twitter, including images uploaded by other services.

90. Twitter users can also opt to include location data in their Tweets, which will reveal the users’ locations at the time they post each Tweet. This “Tweet With Location” function is off by default, so Twitter users must opt in to the service. In addition, Twitter users may delete their past location data.

91. When Twitter users want to post a Tweet that includes a link to a website, they can use Twitter’s link service, which converts the longer website link into a shortened link that begins with <http://t.co>. This link service measures how many times a link has been clicked.

92. A Twitter user can “follow” other Twitter users, which means subscribing to those users’ Tweets and site updates. Each user profile page includes a list of the people who are following that user (*i.e.*, the user’s “followers” list) and a list of people whom that user follows (*i.e.*, the user’s “following” list). Twitter users can “unfollow” users whom they previously followed, and they can also adjust the privacy settings for their profile so that their Tweets are visible only to the people whom they approve, rather than to the public (which is the default setting). A Twitter user can also group other Twitter users into “lists” that display on the right side of the user’s home page on Twitter. Twitter also provides users with a list of “Who to Follow,” which includes a few recommendations of Twitter accounts that the user may find

interesting, based on the types of accounts that the user is already following and who those people follow.

93. In addition to posting Tweets, a Twitter user can also send Direct Messages (DMs) to one of his or her followers. These messages are typically visible only to the sender and the recipient, and both the sender and the recipient have the power to delete the message from the inboxes of both users. Twitter may not display all DMs for a particular user, but older DMs are stored on Twitter's database.

94. Twitter users can configure the settings for their Twitter accounts in numerous ways. For example, a Twitter user can configure his or her Twitter account to send updates to the user's mobile phone, and the user can also set up a "sleep time" during which Twitter updates will not be sent to the user's phone.

95. Twitter includes a search function that enables its users to search all public Tweets for keywords, usernames, or subject, among other things. A Twitter user may save up to 25 past searches.

96. Twitter users can connect their Twitter accounts to third-party websites and applications, which may grant these websites and applications access to the users' public Twitter profiles.

97. If a Twitter user does not want to interact with another user on Twitter, the first user can "block" the second user from following his or her account.

98. In some cases, Twitter users may communicate directly with Twitter about issues relating to their account, such as technical problems or complaints. Social-networking providers like Twitter typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by

the provider or user as a result of the communications. Twitter may also suspend a particular user for breaching Twitter's terms of service, during which time the Twitter user will be prevented from using Twitter's services.

99. Therefore, the computers of Twitter are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Twitter, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

100. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Twitter to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

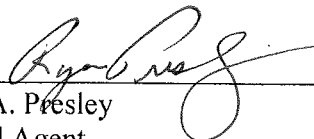
101. Based on the forgoing facts and circumstances, there is probable cause to believe that Robert C. McCollum has committed and is committing the offenses of Conspiring, Attempting to Provide, and Providing Material Support to a Designated Terrorist Group, and that evidence of this offense will be found on the target accounts.

102. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States . . . that – has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

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103. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

Respectfully submitted,



Ryan A. Presley
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on 13 February, 2015



NANCY A VECCHIARELLI
UNITED STATES MAGISTRATE JUDGE

13 Feb 2015

DATE

1 : 15 MJ 4001

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the Twitter profile “Amir Al Ghazi,” with username “@amiralghazi76,” at URL of <https://twitter.com/amiralghazi76>, and “Amir Muwahid,” with username “@MuwahidAmir,” at URL of <https://twitter.com/MuwahidAmir>, that is stored at premises owned, maintained, controlled, or operated by Twitter, a company headquartered in San Francisco, California.

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ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Twitter

To the extent that the information described in Attachment A is within the possession, custody, or control of Twitter, including any messages, records, files, logs, or information that have been deleted but are still available to Twitter, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Twitter is required to disclose the following information to the government for each account listed in Attachment A:

- a. All identity and contact information, including full name, e-mail address, physical address (including city, state, and zip code), date of birth, gender, hometown, occupation, and other personal identifiers;
- b. All past and current usernames, account passwords, and names associated with the account;
- c. The dates and times at which the account and profile were created, and the Internet Protocol (“IP”) address at the time of sign-up;
- d. All IP logs and other documents showing the IP address, date, and time of each login to the account;
- e. All data and information associated with the profile page, including photographs, “bios,” and profile backgrounds and themes;
- f. All “Tweets” and Direct Messages sent, received, “favorited,” or retweeted by the account, and all photographs or images included in those Tweets and Direct Messages;

- g. All information from the “Connect” tab for the account, including all lists of Twitter users who have favorited or retweeted Tweets posted by the account, as well as a list of all Tweets that include the username associated with the account (*i.e.*, “mentions” or “replies”);
- h. All photographs and images in the user gallery for the account;
- i. All location data associated with the account, including all information collected by the “Tweet With Location” service;
- j. All information about the account’s use of Twitter’s link service, including all longer website links that were shortened by the service, all resulting shortened links, and all information about the number of times that a link posted by the account was clicked;
- k. All data and information that has been deleted by the user;
- l. A list of all of the people that the user follows on Twitter and all people who are following the user (*i.e.*, the user’s “following” list and “followers” list);
- m. A list of all users that the account has “unfollowed” or blocked;
- n. All “lists” created by the account;
- o. All information on the “Who to Follow” list for the account;
- p. All privacy and account settings;
- q. All records of Twitter searches performed by the account, including all past searches saved by the account;
- r. All information about connections between the account and third-party websites and applications;

- s. All records pertaining to communications between Twitter and any person regarding the user or the user's Twitter account, including contacts with support services, and all records of actions taken, including suspensions of the account.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of Title 18, United States Code 2339B(a)(1), Conspiring, Attempting to Provide, and Providing Material Support to a Designated Foreign Terrorist Organization, involving Robert C. McCollum since account inception to present, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- a. Records relating to who created, used, or communicated with the account, including records about their identities and whereabouts.
- b. Communications, and other information/records/data, between McCollum and other individuals regarding the conduct or incitement of violent jihad in the United States, against its citizens, and/or its interests.
- c. Communications, and other information/records/data, between McCollum and other individuals regarding recruitment/membership in/provision of support for Islamic State in Iraq and Syria (ISIS), Islamic State in the Levant (ISIL), as this pertains to any of the matters described in (b).
- d. Photographs, videos, tweets, retweets, direct messages, searches, IP logs, follower requests, activity logs, communications, messages, or records pertaining to any of the above matters described in (b) and (c).

CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS RECORDS
PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Twitter, and my official title is _____. I am a custodian of records for Twitter. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Twitter, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Twitter; and
- c. such records were made by Twitter as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature