

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of

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

A residence located at 3726 South 180th St., Apt. E 304,  
Tukwila, WA

Case No.

MJ 11-290

## 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):

A residence located at 3726 South 180th St, Apt. E 304, Tukwila, WA, as described in Attachment A, attached hereto and incorporated herein by reference

located in the \_\_\_\_\_ Western \_\_\_\_\_ District of \_\_\_\_\_ Washington \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated herein by reference

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.

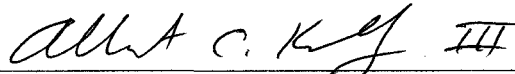
The search is related to a violation of:

Code Section  
See Attachment B,  
incorporated herein by  
reference

Offense Description

The application is based on these facts:  
See Attached Affidavit of Special Agent Albert C. Kelly, III, attached hereto and incorporated herein by reference

- ☒ 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.



Applicant's signature

Albert C. Kelly, III, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

June 22, 2011

City and state: Seattle, Washington



Judge's signature

Magistrate Judge Mary Alice Theiler

Printed name and title

**AFFIDAVIT**

STATE OF WASHINGTON

COUNTY OF KING

ss

I, Albert C. Kelly, III, being first duly sworn, depose and state as follows:

**Affiant's Background**

1. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI"). I have been an FBI SA since March 2008, and since that time I have been assigned to a counter-terrorism squad at the Seattle Division. I graduated from the Air Force Academy in 2002. I served as an Air Force Intelligence Officer in both Afghanistan and Djibouti. In March 2008, I went through the standard FBI training regimen at Quantico, Virginia. In addition, I have attended the FBI's specialized counter-terrorism investigative operations course, and another training course concerning terrorist ideology.

2. The information in this affidavit is based on my direct knowledge and on information provided by other law enforcement sources. This affidavit does not include everything I learned during the investigation, but rather only includes enough information to show probable cause.

3. This affidavit is made in support of an application for a search warrant to search a residence located at 3726 South 180th Street, Apartment E 304, Tukwila, Washington (the "SUBJECT PREMISES"). The SUBJECT PREMISES is located in the Hunt Club Apartment complex, on the third floor of a building marked with an "E," as described in Attachment A to this affidavit, attached hereto and incorporated by reference herein. The bottom half of the building is brown, the top half is light tan, and a thick dark brown strip separates the top and bottom halves.

4. As set forth below, there is probable cause to believe that a search of the SUBJECT PREMISES will provide evidence, instrumentalities, or fruits of violations of the following offenses: the following offenses: Conspiracy to Murder Officers and

1 Employees of the United States, in violation of Title 18, United States Code, Sections  
2 1114 and 1117; Conspiracy to Use Weapons of Mass Destruction, in violation of Title 18,  
3 United States Code, Section 2332a(a)(3); Possession of Firearms (Machineguns) in  
4 Furtherance of Crimes of Violence, in violation of Title 18, United States Code, Section  
5 924(c)(1)(B)(ii); and Unlawful Possession of Firearms, in violation of Title 18, United  
6 States Code, Section 922(g)(1).

### 7 **Summary Of The Investigation**

8 5. This investigation has revealed that ABU KHALID ABDUL-LATIF, a/k/a  
9 JOSEPH ANTHONY DAVIS (hereinafter "ABDUL-LATIF"), and WALLI  
10 MUJAHIDH, a/k/a FREDERICK ANTHONY DOMINGUE, JR. (hereinafter  
11 "MUJAHIDH")(collectively, "the defendants") have conspired to attack a United States  
12 Military facility and murder employees and officers of the United States Military. The  
13 defendants planned to carry out the attack using fully-automatic weapons, pistols, and  
14 fragmentation grenades. Their goal was to kill and maim numerous United States  
15 Military personnel. During conversations that were audio recorded, ABDUL-LATIF  
16 explained the reasons for the attack, specifically his anger over the United States  
17 Military's real or perceived activities in Afghanistan, Iraq, and Yemen. ABDUL-LATIF  
18 explained that, in his view, murdering American soldiers is justifiable.

19 6. The defendants' initial target for their attack was the Joint Base Lewis-  
20 McChord, a joint facility consisting of a United States Army base (previously known as  
21 "Fort Lewis") and a United States Air Force base (previously known as "McChord Air  
22 Force Base"). The defendants later changed their target to the Military Entrance  
23 Processing Station ("MEPS") located at 4735 East Marginal Way, Seattle, Washington.

24 7. The Department of Defense operates numerous MEPS throughout the  
25 United States. Applicants seeking to join one of the branches of the United States  
26 Military, including the Army, Navy, Air Force, and Marines, apply through and are  
27 processed at a MEPS. Accepted applicants often go through final processing at a MEPS  
28 and then are transported to basic training directly from the MEPS. A MEPS is staffed by

1 United States Military personnel and other federal civilian employees, who administer  
2 tests and evaluate an applicant's physical qualifications and other aptitude per criteria set  
3 by each branch of the United States Military. MEPS employees also process applicants  
4 for acceptance into the United States Military.

5 8. One of the Department of Defense MEPS is housed in the Federal Center  
6 South building, located at 4735 East Marginal Way, Seattle, Washington. The Federal  
7 Center South is a two-story building that is owned and operated by the United States  
8 Government, General Services Administration. In addition to the MEPS, this building  
9 houses a variety of other United States Government agencies and offices. A federal child  
10 care center is located in the building, immediately adjacent to the MEPS.

11 9. The plot was revealed when ABDUL-LATIF recruited a third person to join  
12 the conspiracy. That person reported the plot to law enforcement and is now a law  
13 enforcement confidential source (the "Source"). Per standard practice, I will refer to the  
14 Source as a man, regardless of the Source's real gender. Based on their prior relationship,  
15 ABDUL-LATIF trusted the Source and believed that the Source could help the  
16 conspirators get the weapons they would need for the attack.

17 10. On numerous occasions during the investigation, the Source communicated  
18 with the defendants at the direction of law enforcement personnel. Numerous meetings  
19 and conversations between the Source and the defendants were recorded on audio and/or  
20 video. These recordings show the defendants working to carry out their plan to kill  
21 officers and employees of the United States Military. Some (but certainly not all)  
22 examples of the defendants' intent, planning, preparation, and overt acts are listed below  
23 and are described in greater detail elsewhere herein:

24 a. After conducting internet research and reconnaissance, the  
25 defendants selected the Seattle MEPS as a target;

26 b. ABDUL-LATIF ordered the Source to go "undercover" into the  
27 Federal Center South building to learn the layout of the building and the specific location  
28 of the MEPS, and the Source has reported back to ABDUL-LATIF after supposedly

1 doing this;

2 c. ABDUL-LATIF instructed the Source to obtain automatic weapons,  
3 pistols, grenades, bulletproof vests, and other items for use in the attack on the MEPS.

4 d. ABDUL-LATIF devised and extensively discussed the tactical  
5 details of the attack;

6 e. MUJAHIDH traveled from Los Angeles, California to Seattle,  
7 Washington to participate in the attack;

8 f. ABDUL-LATIF arranged to purchase a bus ticket for MUJAHIDH's  
9 trip to Seattle;

10 g. ABDUL-LATIF personally handled two different kinds of automatic  
11 weapons as part of the process of choosing the weapons to use during the attack, and  
12 ordered the Source to buy three machineguns and several loaded magazines, with the  
13 understanding that grenades and other items necessary for the attack would be obtained at  
14 a later time; and

15 h. ABDUL-LATIF provided the Source with \$800 cash towards the  
16 purchase of the machineguns.

#### 17 **Defendants' Backgrounds**

18 11. ABDUL-LATIF is a thirty-three year old Washington resident. Criminal  
19 records checks show that he has at least two felony convictions: a 2002 conviction for  
20 Robbery in the First Degree and a 2003 conviction for Custodial Assault. ABDUL-  
21 LATIF also has misdemeanor convictions for Obstructing a Law Enforcement Officer,  
22 Assault, and Theft. I have seen the Judgement and Sentence for ABDUL-LATIF's 2002  
23 Robbery conviction, and it shows that he was convicted on or about January 15, 2002, in  
24 the Kitsap County Superior Court, for the offense of Robbery in the First Degree, in  
25 violation of RCW 9A.56.200, cause number 01-1-01719-3. This is a felony offense and  
26 ABDUL-LATIF was sentenced to thirty-one months of imprisonment. The paperwork  
27 from that case includes a psychological evaluation. The evaluator concluded that,  
28 although ABDUL-LATIF might have some psychological issues, he was competent to

1 participate in his defense. Criminal records checks show no felony convictions for  
2 California resident MUJAHIDH under either of his names.

### 3 **Details Of The Investigation**

#### 4 The Source Reports The Conspiracy To Law Enforcement

5 12. This investigation began on June 3, 2011, when the Source contacted the  
6 Seattle Police Department ("SPD") to report the conspiracy. The Source has known  
7 ABDUL-LATIF personally for several years. As far as I know, when the Source  
8 contacted the SPD, he was not working as an informant for any law enforcement agency.  
9 The Source has since become a paid informant. The Source has extensive criminal  
10 history, including at least five felony convictions and one misdemeanor conviction. The  
11 most recent conviction that I know of was in 2008. Although the Source has been  
12 convicted of extremely serious offenses, as far as I know, the Source has no convictions  
13 for crimes of dishonesty. Criminal history paperwork also shows multiple names and two  
14 social security numbers for the Source. As far as I know, the Source does not have any  
15 pending criminal charges. As far as I know, the Source has told law enforcement the  
16 truth during this investigation.

17 13. On June 4, 2011, the Source met with SPD detectives and provided  
18 additional details concerning his recent contacts with ABDUL-LATIF. The Source said  
19 that he had met with ABDUL-LATIF on or about May 30, 2011, at the SUBJECT  
20 PREMISES, ABDUL-LATIF's home located at 3726 South 180th Street, Apartment E  
21 304, Tukwila, Washington. According to the Source, during this meeting (some of which  
22 occurred immediately outside the SUBJECT PREMISES), ABDUL-LATIF told the  
23 Source that he and another man from Los Angeles (referring to MUJAHIDH) were  
24 planning to attack Joint Base Lewis-McChord ("Fort Lewis") in Tacoma, Washington.  
25 ABDUL-LATIF told the source that the attack would be in retaliation for alleged crimes  
26 committed by United States soldiers in Afghanistan. ABDUL-LATIF said that he wanted  
27 to die as a martyr in the attack. According to the Source, ABDUL-LATIF asked the  
28 Source to join the conspiracy. ABDUL-LATIF asked the Source to participate directly in



1 the attack, and to help the conspirators get weapons. According to the Source (and as  
2 corroborated by later recorded conversations), ABDUL-LATIF claims to know very little  
3 about firearms, and believes that the Source has connections who can supply firearms.  
4 The Source pretended to be interested in the plan. The May 30th meeting was not  
5 recorded because the Source was not working for law enforcement at that time.

6 14. Acting on instructions from the SPD, the Source met with ABDUL-LATIF  
7 on June 3, 2011. According to the Source's account of this meeting, the Source told  
8 ABDUL-LATIF that he had a contact who could supply weapons. ABDUL-LATIF said  
9 that he had between \$800 and \$1,200 to buy weapons, and asked how much money the  
10 Source could contribute. The Source said he could contribute \$1,000. ABDUL-LATIF  
11 told the Source that a man from Los Angeles, named "Walli," would join the attack.  
12 "Walli" was later identified as WALLI MUJAHIDH. ABDUL-LATIF said that  
13 MUJAHIDH would be the driver for the attack. ABDUL-LATIF said that he wanted to  
14 drive a van through the Fort Lewis guard gate and open fire with weapons and possibly  
15 explosives. ABDUL-LATIF made clear that the goal was to kill soldiers, not civilians.

16 15. According to the Source, during the June 3rd meeting, ABDUL-LATIF  
17 introduced the Source to MUJAHIDH by calling MUJAHIDH on the telephone and  
18 having him talk to the Source. MUJAHIDH told the Source that his phone number was  
19 323-667-8960. My investigation has shown that the subscriber for this phone number is  
20 "Muslim Mujahidh," and the account is in the name of WALLI MUJAHIDH. The Source  
21 told MUJAHIDH that he had a contact who could supply weapons.

22 16. After the phone call with MUJAHIDH, ABDUL-LATIF told the Source  
23 that he wanted to conduct the attack as soon as possible, and before the conspirators could  
24 talk themselves out of it. According to the Source, ABDUL-LATIF specifically  
25 commented with words to the effect that, "The longer we wait, the more we'll talk  
26 ourselves out of it." ABDUL-LATIF also stated that the longer they waited, the "more  
27 chance the feds will catch-up with you." ABDUL-LATIF told the Source that he wanted  
28 to acquire, for use in the attack, AK-47 assault rifles, a rocket propelled grenade ("RPG"),

1 grenades, and bullet proof vests. ABDUL-LATIF explained that, in advance of the  
2 attack, the conspirators would train with the weapons in Wenatchee, Washington.

3 17. According to the Source, ABDUL-LATIF explained his motives. ABDUL-  
4 LATIF said that he admired Osama Bin Laden. ABDUL-LATIF said that "jihad" in  
5 America should be a "physical jihad," and not just a "media jihad," expressing his view  
6 that it was necessary to take action rather than just talk. ABDUL-LATIF referred to the  
7 2009 Fort Hood massacre, when a single gunman killed thirteen people. ABDUL-LATIF  
8 said that if one person could kill so many people, three attackers could kill many more.  
9 ABDUL-LATIF said that, if he was killed in the attack, his son would be proud that he  
10 fought the "non-believers."

11 18. On June 6, 2011, the Source met with me and other FBI Special Agents.  
12 From that point on, the Source has been acting at the FBI's direction. We told the Source  
13 that he should purport to agree to join ABDUL-LATIF's conspiracy and record all of his  
14 future conversations with ABDUL-LATIF and MUJAHIDH.

15 The Plot Focuses On The MEPS

16 19. Later on June 6, 2011, the Source met with ABDUL-LATIF at the  
17 SUBJECT PREMISES. This was the first time that the Source met with ABDUL-LATIF  
18 at the FBI's direction. We gave the Source a recording device before the meeting. I have  
19 listened to the recording of that meeting. During the meeting, ABDUL-LATIF talked  
20 about alleged atrocities committed by United States soldiers in Afghanistan, specifically  
21 referencing ongoing military proceedings against Army soldiers stationed at Fort Lewis.  
22 ABDUL-LATIF said that he was not comfortable with letting the legal system deal with  
23 these alleged crimes.

24 20. ABDUL-LATIF and the Source then discussed ABDUL-LATIF's plan to  
25 attack Fort Lewis. ABDUL-LATIF said that they could simply drive a truck through the  
26 base's gate. ABDUL-LATIF and the Source talked about what kinds of weapons they  
27 would need. Based on ABDUL-LATIF's prior statements that he wanted to perpetrate  
28 the attack with AK-47 assault rifles, the Source suggested the alternative of M16 assault



1 rifles, which are consistent with the capabilities of an AK-47 but are more readily  
2 available in the United States. The Source explained that he would be able to obtain three  
3 automatic M16's for \$1,200. ABDUL-LATIF said that he trusted the Source's opinions  
4 about weapons because the Source had experience with firearms. The Source said that, if  
5 ABDUL-LATIF came up with the plan, the Source could handle the tactical aspects of  
6 the operation. ABDUL-LATIF suggested committing the attack on July 5, 2011.

7 21. ABDUL-LATIF and the Source then had a phone conversation with  
8 MUJAHIDH. MUJAHIDH is believed to have been in Los Angeles, California (where  
9 he lives) at the time of the call. The Source asked ABDUL-LATIF what type of firearms  
10 he wanted. ABDUL-LATIF used his computer to look-up the M16 assault rifle on the  
11 Internet. ABDUL-LATIF stated, "I want the one . . . that will have the most effect."  
12 ABDUL-LATIF asked MUJAHIDH for his input. MUJAHIDH said that, if the  
13 conspirators had enough ammunition, they "should be able to take care of that." The  
14 defendants and the Source discussed flying MUJAHIDH from Los Angeles to Seattle  
15 during the next couple of weeks.

16 22. During the phone conversation, the Source said that he wanted to be sure  
17 that MUJAHIDH was committed to the plan and would not "back out." MUJAHIDH  
18 answered, "You don't have to worry about me." ABDUL-LATIF also asked  
19 MUJAHIDH if he was committed. MUJAHIDH answered that he had "nothing to lose"  
20 and "everything to gain."

21 23. ABDUL-LATIF then explained that the conspirators should pick a leader.  
22 The Source nominated ABDUL-LATIF based on his age and knowledge of Islam.  
23 MUJAHIDH agreed. ABDUL-LATIF then told MUJAHIDH that they would bring him  
24 up to Washington and then go "camping" and practice their "skills." In an apparent  
25 reference to weapons training, MUJAHIDH said that he had no "experience." The  
26 Source then suggested that their respective roles would be "emir" (or leader), "tactician,"  
27 and "driver." ABDUL-LATIF told MUJAHIDH that his role would be to drive a "truck  
28 that looks like the Titanic" through the "front gate" of the target location. The truck

1 would be a "battering ram" and would "guard" the conspirators while they did their  
2 "duties" (the attack). ABDUL-LATIF said that he and the Source needed a driver while  
3 they did their "part." ABDUL-LATIF explained that at some point during the attack,  
4 MUJAHIDH would join the Source and ABDUL-LATIF as they carried out their  
5 responsibilities. ABDUL-LATIF said that he was looking for a "psychopath." The  
6 phone call with MUJAHIDH ended shortly thereafter.

7 24. ABDUL-LATIF and the source then continued discussing the attack plan.  
8 They began researching Fort Lewis on the Internet. ABDUL-LATIF stated that he  
9 wanted to find the spot on the base "where the most activity is at." The Source asked  
10 ABDUL-LATIF what the "objective" was. ABDUL-LATIF said that the "objective" was  
11 to "take out anybody wearing green or a badge."

12 25. During this conversation, ABDUL-LATIF suggested a new target: "hitting"  
13 a "MEPS." The Source asked what a MEPS was. ABDUL-LATIF (who served briefly in  
14 United States Navy in the mid-1990's) explained that a MEPS was a military processing  
15 station where applicants are tested and evaluated. ABDUL-LATIF said that the  
16 applicants at a MEPS were people who want to go to Iraq or Afghanistan. ABDUL-  
17 LATIF explained the tactical advantages of attacking a MEPS, where many potential  
18 victims would be unarmed: "It's a confined space, not a lot of people carrying weapons,  
19 and we'd have an advantage."

20 26. ABDUL-LATIF and the Source then researched on the Internet and found a  
21 military recruiting office in downtown Seattle. ABDUL-LATIF said that attacking a  
22 MEPS might "deter" people from joining the military and would "send a message."  
23 ABDUL-LATIF also noted that there would be few, if any, civilians at a MEPS.  
24 ABDUL-LATIF said that, although he was the "emir," he wanted the Source's thoughts  
25 on whether the MEPS was a good target. The Source answered that he thought the MEPS  
26 was a viable target. ABDUL-LATIF said that they could walk in and "hit" anybody in the  
27 MEPS. ABDUL-LATIF suggested that they should drive over to the building and "take a  
28 look."

1           27. Earlier on June 6th, the Source sent a text message to MUJAHIDH's cell  
2 phone number. The Source asked MUJAHIDH for his true name so that he could arrange  
3 to purchase a plane ticket for MUJAHIDH's flight from Los Angeles to Seattle.  
4 MUJAHIDH answered that his name was FREDERICK ANTHONY DOMINGUE, JR. I  
5 have reviewed this exchange of text messages.

6           28. ABDUL-LATIF and the Source met again the next day, June 7, 2011. This  
7 meeting was also recorded, and I have listened to the recording. Almost as soon as the  
8 conversation began, ABDUL-LATIF told the Source that the military recruiting office in  
9 downtown Seattle was not the MEPS he wanted to attack: "That building we saw [on the  
10 Internet] downtown, that's, that's not it." ABDUL-LATIF said that the target MEPS was  
11 located on East Marginal Way near Boeing Field (referring to the Federal Center South  
12 building). ABDUL-LATIF said that he had looked-up the MEPS (apparently on the  
13 Internet) but that he could not see it well from aerial views.

14           29. ABDUL-LATIF told the Source: "We need to get inside that building. . . .  
15 The idea I had was for you to kind of go undercover. . . . Go in there and see what the  
16 first floor looks like." ABDUL-LATIF again explained what a MEPS was, and added  
17 that most applicants would be sent to Afghanistan, Iraq, and Yemen. ABDUL-LATIF  
18 said that he had called the MEPS to confirm the address of the East Marginal Way  
19 location. ABDUL-LATIF further stated that he and the Source should meet the next day  
20 to drive by the building: "We need to know what the front desk looks like, the lobby,  
21 everything." ABDUL-LATIF said that they could then draw a map of the layout of the  
22 first floor. ABDUL-LATIF and the Source then researched the target MEPS on the  
23 Internet. ABDUL-LATIF opined that the target MEPS was better than the downtown  
24 location because it was two stories as opposed to five.

25           30. ABDUL-LATIF further discussed his planned attack on the MEPS.  
26 ABDUL-LATIF said that he had "never heard of a terrorist attack on a MEPS station."  
27 ABDUL-LATIF said that the military was "arrogant" and stated that their attack could  
28 "do some damage." ABDUL-LATIF also predicted that the attack would inspire other

1 Muslims to carry out similar attacks: "Imagine how many young Muslims, if we're  
2 successful, will try to hit these kinds of centers. Imagine how fearful America will be,  
3 and they'll know they can't push the Muslims around." ABDUL-LATIF also mentioned  
4 the possibility that the conspirators could escape after perpetrating the attack.

5 31. During the conversation, ABDUL-LATIF and the Source revisited the  
6 question of who should lead the conspirators. ABDUL-LATIF, after learning that the  
7 Source was older than ABDUL-LATIF, said that the Source should be the leader. The  
8 Source disagreed, noting that ABDUL-LATIF had more "knowledge."

9 32. ABDUL-LATIF told the Source that they should drive by the target MEPS  
10 the next day, get the layout, and "make a plan from there."

11 The Reconnaissance Of The MEPS

12 33. On the following day, June 8, 2011, ABDUL-LATIF and the Source  
13 conducted reconnaissance of the target MEPS. ABDUL-LATIF and the Source met at a  
14 different location and then drove together in the Source's vehicle to the MEPS on East  
15 Marginal Way. I have listened to the recording of this meeting, which was also  
16 monitored by surveillance officers.

17 34. During the drive to the MEPS, ABDUL-LATIF assured the Source that  
18 MUJAHIDH would participate in the attack, but added that MUJAHIDH needed  
19 "medication." ABDUL-LATIF said that MUJAHIDH was worried that, if he did not  
20 have his medication, he might "go off and kill innocent people." ABDUL-LATIF said  
21 that he had told MUJAHIDH that the target was "military," not a public place "like a zoo  
22 or a school."

23 35. ABDUL-LATIF said that the conspirators had enough money to go  
24 anywhere in the world and had "options" (to choose for target locations). The Source  
25 said that they should not lose focus and switch targets. ABDUL-LATIF said that he was  
26 not seriously suggesting changing targets. The Source then summarized the progression  
27 of ABDUL-LATIF's plan to date: "When you first brought it up, it was [Fort] Lewis, then  
28 it flipped to McChord, then it flipped to MEPS, that's why I was saying let's stick, let's

1 stick with this one.” ABDUL-LATIF then discussed the advantages of attacking the  
2 MEPS. ABDUL-LATIF also repeated that he hoped to inspire other similar attacks.

3 36. As the car pulled into the parking lot of the Federal Center South building,  
4 ABDUL-LATIF read aloud the name on the building: “Federal Center South.”  
5 ABDUL-LATIF and the Source got out of the Source’s car and studied the building.  
6 ABDUL-LATIF commented about observing a security guard and surveillance cameras,  
7 and a long hallway in the building. ABDUL-LATIF said that he was not worried about  
8 the guard: “We’ll just kill him right away. . . . We can kill him first.”

9 37. ABDUL-LATIF discussed how the conspirators would approach the MEPS  
10 for the attack, and said that the conspirators could either park and run up to the entrance,  
11 or they could try to drive their car up to the entrance.

12 38. ABDUL-LATIF and the Source also talked about whether MUJAHIDH  
13 was committed to the attack. The Source complained that MUJAHIDH did not want to  
14 travel to Washington until July, even though they wanted him there sooner.  
15 ABDUL-LATIF told the Source not to call MUJAHIDH for a while: “With Walli, just  
16 leave him alone for a couple of days, see if he calls back. Don’t call him or anything.”  
17 The Source said that they needed to know how many people would participate in the  
18 attack so he knew how many weapons to buy. ABDUL-LATIF told the Source to order  
19 enough weapons for three people. ABDUL-LATIF told the Source to “put in our order  
20 right now” so that they could get a price estimate for the weapons. ABDUL-LATIF  
21 specifically instructed the Source to order three rifles, several magazines for each rifle,  
22 and ten hand grenades. ABDUL-LATIF said that, with the grenades, they could “blow up  
23 the whole hallway” that led to the MEPS offices. ABDUL-LATIF said that he had  
24 money set aside with a third person for the hajj, but that he would withdraw some of that  
25 money for use in purchasing the weapons. ABDUL-LATIF also said that he needed to  
26 call the MEPS again to find out what days the recruits are going to be there.  
27 ABDUL-LATIF commented that he wanted to “be there on a day when all the recruits are  
28 processing. . . . I don’t want to come there just to kill an old [security] guard.” At the end



1 of the conversation, ABDUL-LATIF said that the reconnaissance had been productive  
2 and that he and the Source had "learned a lot."

3 39. Later on the night of June 8th, MUJAHIDH sent the Source a text message.  
4 I have seen this message. It reads: "AsSaalamwailikum im ok. It's still a go on my end."

5 ABDUL-LATIF And MUJAHIDH Reaffirm Their Commitment To The Plot

6 40. On June 9, 2011, the Source and ABDUL-LATIF had a recorded telephone  
7 conversation. I have listened to the recording. During the call, ABDUL-LATIF said that  
8 he was worried the conspirators would not have the "element of surprise" when they  
9 attacked the MEPS. ABDUL-LATIF had seen a security camera during the  
10 reconnaissance and was worried that the guard at the front desk would be watching a live  
11 feed from the camera. ABDUL-LATIF was worried that the guard would see the  
12 conspirators as they approached the entrance and would be ready for them: "It would kind  
13 of be pointless, too, if we rolled up there and we all got shot and killed and we didn't get  
14 anybody." The Source said that he did not think that would happen. ABDUL-LATIF  
15 said, "That's cool, that's cool. Let's make sure it doesn't happen." ABDUL-LATIF  
16 urged the Source to carry out an undercover visit into the building as soon as possible.  
17 Later in the conversation, ABDUL-LATIF asked the Source when he could go  
18 undercover into the MEPS building. The Source said that he hoped to go the next day.

19 41. The Source asked ABDUL-LATIF if he really wanted to go through with  
20 the attack: "I want to make sure that you, this is what you're down for. . . . I'm not  
21 going to hold it against you if you say, 'Nah, let's do whatever.' But I just want to make  
22 sure that this is what you want, all the way." ABDUL-LATIF said that they needed to  
23 "wake the Muslims up" to "defend [their] religion." The Source said, "Do you want to  
24 call it off? Or . . . You know, I'm not going to hold it against you." ABDUL-LATIF  
25 chuckled and answered, "Let's work on this, lets make sure it's right. . . . Let's proceed  
26 as planned, let's make sure that we do this right." ABDUL-LATIF said that they should  
27 only call off the plot if they learned that the FBI was watching them. ABDUL-LATIF  
28 confirmed, "I'm ready for this." ABDUL-LATIF further stated that he would call the



1 MEPS the next day to check their schedule: "I don't want to roll up in there just to kill a  
2 couple of females and security guards. . . . Everything has to be done with precision, the  
3 right time and the right day, the program is on point. That's what I'm looking for."

4 42. Also during this conversation, the Source told ABDUL-LATIF that he had  
5 talked to MUJAHIDH and that MUJAHIDH confirmed that he was willing to travel to  
6 Seattle. ABDUL-LATIF and the Source agreed that they needed to get MUJAHIDH to  
7 Seattle as soon as possible, and again discussed pooling their money to buy a plane ticket.  
8 ABDUL-LATIF said that he was trying to get his hands on his share of the ticket price  
9 (roughly seventy dollars).

10 43. Also on June 9, 2011, the Source exchanged text messages with  
11 MUJAHIDH. I have seen the messages. The Source told MUJAHIDH that "everything  
12 is in motion" and "you will be up here soon." The Source asked, "Anything on your  
13 mind[?]" MUJAHIDH answered, "Everything is fine just waiting to be with you brothers  
14 for the sake of Allah . . . . Allah grant us success in w[h]at we go forth to accomplish."

15 Further Planning And Preparation For The MEPS Attack

16 44. On June 10, 2011, the Source and ABDUL-LATIF had another recorded  
17 meeting. I have listened to the recording. During the meeting, the Source pretended to  
18 have followed ABDUL-LATIF's instructions to enter the Federal Center South building  
19 as an "undercover" to learn its layout. The Source showed ABDUL-LATIF what the  
20 Source claimed was a map he had drawn of the first floor. ABDUL-LATIF and the  
21 Source had a long conversation about the tactical details of the attack. ABDUL-LATIF  
22 explained that he wanted to kill the battalion commander at the MEPS because that would  
23 get "attention." ABDUL-LATIF said that he wanted to "run in there man, kill everybody  
24 in there, and run back out." ABDUL-LATIF explained that MUJAHIDH's role would be  
25 to "watch the front."

26 45. ABDUL-LATIF and the Source discussed whether they should use flash-  
27 bang grenades to stun victims, or fragmentation grenades to maim and kill. With respect  
28 to the flash-bangs, ABDUL-LATIF concluded: "Forget that." ABDUL-LATIF asked the

1 Source how much damage he could do by throwing a grenade into the building's  
2 cafeteria. The Source said that it would kill and maim a lot of people. ABDUL-LATIF  
3 decided that he wanted fragmentation grenades because they would deter pursuers and  
4 help achieve the "purpose" of the attack (to kill and maim). ABDUL-LATIF said that he  
5 wanted ten grenades. Referring to the map of the building's floor plan, ABDUL-LATIF  
6 explained the details of where and when he would throw grenades during the attack.  
7 ABDUL-LATIF explained that he wanted another conspirator (a fourth person) who  
8 would serve as the driver and help with the getaway. The Source stated that he might  
9 know somebody who could be the driver, and ABDUL-LATIF said that he trusted the  
10 Source's judgment.

11 46. ABDUL-LATIF gave the Source a specific weapons order to place with the  
12 Source's "connection": three rifles, two extra magazines for each rifle, five grenades, two  
13 pistols, and three bulletproof vests. The Source estimated that the total price would be  
14 roughly \$2,500. The Source then asked how the conspirators would get the message out  
15 about the reasons for the attack. ABDUL-LATIF said that he would print pictures of  
16 soldiers involved in alleged atrocities and leave them on the front desk of the building.

17 47. ABDUL-LATIF and the Source talked about pooling their money to buy a  
18 plane ticket to fly MUJAHIDH to Seattle. ABDUL-LATIF assured the Source that  
19 MUJAHIDH was committed to the plan, and suggested that he had been talking to  
20 MUJAHIDH about carrying out a terrorist attack even before the Source had become  
21 involved in the plot: "This has been in discussion off and on for a while."  
22 ABDUL-LATIF said that MUJAHIDH would carry out the plan because he was "crazy"  
23 and had no family.

24 48. On or about June 13, 2011, the Source spoke with ABDUL-LATIF over the  
25 telephone. Again, ABDUL-LATIF expressed his desire to recruit a fourth person to join  
26 them in the attack. ABDUL-LATIF also stated words to the effect: "Even if it takes an  
27 extra couple of months, we have to do this right. . . . I was jumping the gun on doing this  
28 right now . . . we need to do this right."

1     ABDUL-LATIF Further Discusses the Attack and Arranges Transportation for  
2     MUJAHIDH

3     49.    ABDUL-LATIF and the Source met again on June 14, 2011, and spent  
4     much of the day together. I have listened to the recording of their conversations. During  
5     a portion of this lengthy meeting, ABDUL-LATIF and the Source visited several  
6     locations, including the SUBJECT PREMISES. During their time together on June 14th,  
7     ABDUL-LATIF and the Source discussed flying MUJAHIDH from Los Angeles to  
8     Seattle. ABDUL-LATIF pulled out his copy of the map of the Federal Center South  
9     building (previously provided by the Source) and said that he carried it with him  
10    everywhere. Referring to the map, ABDUL-LATIF explained the tactical reasons why he  
11    felt that the attackers needed a fourth person.

12    50.    ABDUL-LATIF also discussed his motives for the attack. Specifically,  
13    ABDUL-LATIF complained that the United States Military was "invading our lands . . .  
14    stealing our resources . . . locking up our brothers and sisters, you're raping our sisters in  
15    Guantanamo Bay . . . you're in Islamic countries and even when you're asked to leave,  
16    you won't leave . . ." In response to the Source's inquiry about how he planned to get his  
17    message out, ABDUL-LATIF suggested that they could make a DVD recording  
18    explaining the motives behind the attack, and label the DVD with the title, "The reason  
19    we killing your people." ABDUL-LATIF further stated that if they left the DVD behind  
20    "in the car," the police would find it.

21    51.    Later on June 14, 2001, ABDUL-LATIF and the Source called  
22    MUJAHIDH to arrange for him to travel to Seattle. This call was recorded and I have  
23    listened to the recording. ABDUL-LATIF told MUJAHIDH that he was about to  
24    purchase his plane ticket. ABDUL-LATIF asked MUJAHIDH to spell his last name.  
25    MUJAHIDH gave his last name as "Domingue Jr." After ABDUL-LATIF and the  
26    Source spent some time researching plane tickets on the Internet, MUJAHIDH said that  
27    he would rather travel by bus. Using the Internet, ABDUL-LATIF and the Source bought  
28    a bus ticket for MUJAHIDH. The bus was scheduled to leave Los Angeles on Monday,

1 June 20, 2011, and arrive in Seattle on Tuesday, June 21st. ABDUL-LATIF gave  
2 MUJAHIDH the "pick-up password" for the bus ticket. Initially, ABDUL-LATIF  
3 suggested "jihad" as the password. The conspirators laughed, and then ABDUL-LATIF  
4 told MUJAHIDH that his password would be "OBL," for "Osama Bin Laden."

5 ABDUL-LATIF Inspects Weapons And Selects Machineguns For The Attack

6 52. The Source met with ABDUL-LATIF a second time on June 14, 2011. The  
7 purpose of this meeting was for the Source to show ABDUL-LATIF two different types  
8 of assault rifles, so that ABDUL-LATIF could pick the weapon he wanted the  
9 conspirators to use during the MEPS attack. Before the meeting, law enforcement  
10 officers provided the Source with one fragmentation grenade; one Heckler & Koch MP5,  
11 9 x 19 mm caliber sub-machinegun, with serial number 62-370875; and one Colt M16A2  
12 Commando, 5.56 mm caliber assault rifle, with serial number A0137282. Each of these  
13 items was consistent with the types of firearms and grenades that ABDUL-LATIF  
14 previously had instructed the source to obtain. Due to safety concerns, the firearms and  
15 the grenade were made inoperable before giving them to the Source.

16 53. Special Agent Heidi Wallace of the Bureau of Alcohol, Tobacco, Firearms,  
17 and Explosives has examined both of the above-referenced firearms. SA Wallace has  
18 extensive training and experience in identifying firearms, determining where they were  
19 manufactured and whether they have traveled in interstate commerce, and in determining  
20 whether firearms are fully-automatic and meet the definition of "machinegun" provided in  
21 Title 18, United States Code, Section 921(a)(23), and Title 26, United States Code,  
22 Section 5845(b). After examining both firearms, SA Wallace determined that both were  
23 manufactured outside of the State of Washington, and therefore must have traveled to  
24 Washington in interstate or foreign commerce. SA Wallace also determined that both  
25 firearms were "machineguns" as defined by federal law, because each was designed to  
26 shoot automatically more than one shot, without manual reloading, by a single function of  
27 the trigger.

28 54. The meeting on June 14th took place in the Source's vehicle. The meeting

1 was recorded by audio and video, and I have seen and listened to the recording. The  
2 Source told ABDUL-LATIF that he was going to take him to a secluded place for "show  
3 and tell." When they arrived, the Source told ABDUL-LATIF that his weapons "contact"  
4 had given him something to show to ABDUL-LATIF so that ABDUL-LATIF would see  
5 that the contact had access to the weapons he wanted. ABDUL-LATIF asked if they  
6 would have to return the items to the contact, and the Source confirmed this.  
7 ABDUL-LATIF commented that (during the attack) they should never touch "anything"  
8 with their bare hands (to avoid leaving fingerprints).

9       55. With ABDUL-LATIF sitting in the passenger seat, the Source reached into  
10 a duffel bag and pulled out the MP5 sub-machinegun. The Source told ABDUL-LATIF  
11 that the weapon was an MP5 and handed it to ABDUL-LATIF. ABDUL-LATIF held the  
12 machinegun and said, "Tell me about it." The Source explained that the MP5 fired a  
13 9mm round. ABDUL-LATIF then handed the MP5 to the Source so the Source could  
14 show him how to use it. The Source showed ABDUL-LATIF how to insert and remove a  
15 magazine and how to chamber a round. The Source then pointed to the selector switch  
16 that controlled whether the gun would operate in single-fire (semi-automatic) or fully-  
17 automatic mode. The Source asked, "Can you tell which one [setting] is fully-  
18 automatic?" ABDUL-LATIF pointed to the fully-automatic setting. ABDUL-LATIF  
19 asked how many rounds the magazine held, and the Source told him that it held 30  
20 rounds. ABDUL-LATIF asked how much the MP5 cost, and the Source said \$300. The  
21 Source handed the MP5 back to ABDUL-LATIF, who again handled the weapon. On the  
22 video, ABDUL-LATIF is shown loading a magazine, pointing the MP5 at the hidden  
23 camera, and pulling the trigger.

24       56. The Source then brought out the M16A2 assault rifle and handed it to  
25 ABDUL-LATIF. The Source identified it as a military-issue "M4," and explained that it  
26 was a newer version of the M16. ABDUL-LATIF held the M16A2 and said, "Okay, tell  
27 me about it." The Source explained that the M16A2 fired a bigger round than the MP5,  
28 and that the round would leave a "bigger hole" and penetrate almost "anything." The



1 Source showed ABDUL-LATIF how to use the M16A2 while ABDUL-LATIF held the  
2 weapon. The Source showed ABDUL-LATIF the selector switch and noted the fully-  
3 automatic setting. ABDUL-LATIF listened as the Source explained the intricacies of  
4 using the M16A2, and ABDUL-LATIF said, "We're going to have to work on this a little  
5 bit." During the same conversation, ABDUL-LATIF also commented: "We're not doing  
6 this tomorrow, so we got time to work with it." ABDUL-LATIF pointed the M16A2 in  
7 the direction of the camera and pulled the trigger. The Source told ABDUL-LATIF that  
8 the M16A2 would cost \$400. ABDUL-LATIF asked the Source which weapon he  
9 thought they should use. The Source said that the M16A2 was the better bet. ABDUL-  
10 LATIF asked how much the magazines cost. The Source said \$50 each.

11 57. The Source then pulled out the fragmentation grenade and handed it to  
12 ABDUL-LATIF. ABDUL-LATIF said, "For real? If you throw it, it will blow up?" The  
13 Source showed ABDUL-LATIF how to pull the pin and use the grenade, and ABDUL-  
14 LATIF held the grenade in his hand. ABDUL-LATIF asked the Source if he had any  
15 pistols. The Source said that he did not have a pistol with him, but said that his weapons  
16 supplier had told him that pistols were "a dime-a-dozen."

17 58. ABDUL-LATIF and the Source then discussed whether to use the MP5 or  
18 the M16A2. The Source pointed out that the M16A2 round would penetrate a bulletproof  
19 vest. ABDUL-LATIF said, "Well, I mean, you know, most people [in the MEPS], they're  
20 not wearing vests anyway." The Source noted that the armed security guards would have  
21 vests. ABDUL-LATIF said, "We probably want to get what's better." The Source said  
22 that would be the M16A2.

23 59. ABDUL-LATIF then discussed his plans for the attack, including his desire  
24 to recruit a fourth attacker. ABDUL-LATIF took out the map of the Federal Center  
25 South building layout and, pointing to the map, talked about the attack plan and where  
26 they would throw grenades: "[W]e want to throw a grenade right here to prevent anybody  
27 from running after us. We go over here, we can, we can either throw a grenade in the  
28 cafeteria, or we can throw a grenade in the corner." The Source explained that a grenade



1 would kill or maim anybody within a fifteen yard radius. The Source asked ABDUL-  
2 LATIF if he still wanted five grenades. ABDUL-LATIF said, "I want to do what we can  
3 afford."

4 60. ABDUL-LATIF instructed the Source to purchase only the rifles at this  
5 time, and to get the pistols, grenades, and the other items for the attack at a later time.  
6 ABDUL-LATIF said that the attackers needed to train with the rifles: "Let's get  
7 proficient with this [rifle], because this is the most difficult piece of equipment."  
8 ABDUL-LATIF explained that they did not need to acquire the pistols and grenades right  
9 away, because they did not need to "train" with those items (suggesting that they were  
10 easier to use). ABDUL-LATIF said that, once they had the rifles, they could go to  
11 Wenatchee to train with them. ABDUL-LATIF said that he planned to get the \$800 from  
12 the "brother" (the third party who was holding the money that ABDUL-LATIF had set  
13 aside for his religious travel). ABDUL-LATIF mentioned that he had barely ever touched  
14 a gun before. During this portion of the conversation, ABDUL-LATIF and the Source  
15 continued to handle the M16A2 and practice how to operate it.

16 61. Towards the end of the meeting, ABDUL-LATIF specifically instructed the  
17 Source to purchase three M16A2's and six magazines, which ABDUL-LATIF expected  
18 would cost \$1,500. ABDUL-LATIF instructed the Source to place the order for these  
19 weapons.

20 ABDUL-LATIF Provides the Source with Cash to Purchase the Machineguns

21 62. On or about June 16 and 17, 2011, ABDUL-LATIF provided the Source  
22 with \$800.00 to pay for the weapons that he and MUJAHIDH intended to use during the  
23 attack on the MEPS. During the course of discussing the payment of the \$800.00,  
24 ABDUL-LATIF referenced having multiple bank accounts, and he withdrew some of the  
25 funds from two bank accounts through a bank ATM machine.

26 Probable Cause Related To MUJAHIDH

27 63. From recorded conversations between ABDUL-LATIF, MUJAHIDH, and  
28 the Source, I know that, on or about June 14, 2011, ABDUL-LATIF and the Source

1 bought a bus ticket for MUJAHIDH to travel from California to Seattle in preparation for  
 2 the MEPS attack. MUJAHIDH was scheduled to arrive by bus in Seattle on June 21,  
 3 2011. Since the Defendants plan to train for weeks before the actual attack, it is likely  
 4 that MUJAHIDH will arrive with baggage. ABDUL-LATIF has discussed having  
 5 MUJAHIDH stay with him, although that was not definitive. Accordingly, there is  
 6 probable cause to believe that MUJAHIDH's baggage and personal possessions will be  
 7 found at the SUBJECT PREMISES, and I seek authorization to search his baggage and  
 8 personal possessions for the items described in Attachment B.

### 9 **Items To Be Searched For And Seized**

10 64. As discussed above, ABDUL-LATIF has emphasized that the conspirators  
 11 need to train, practice, and prepare for the attack on the MEPS. As also discussed above,  
 12 at least two meetings in furtherance of the attack plot have taken place at the SUBJECT  
 13 PREMISES, where ABDUL-LATIF lives, and ABDUL-LATIF has done Internet  
 14 research in furtherance of the plot from a computer located at the SUBJECT PREMISES.  
 15 Moreover, on several occasions, ABDUL-LATIF discussed with the Source the fact that  
 16 he has viewed and may possess video clips and other materials concerning alleged  
 17 atrocities committed by the United States Military in the Middle East. Accordingly, based  
 18 upon my training, experience, and participation in counter-terrorism investigations, and  
 19 based upon my conversations with other experienced law enforcement agents and  
 20 officers, I respectfully submit that there is probable cause to believe that the following  
 21 offenses have been committed: Conspiracy to Murder Officers and Employees of the  
 22 United States, in violation of Title 18, United States Code, Sections 1114 and 1117;  
 23 Conspiracy to Use Weapons of Mass Destruction, in violation of Title 18, United States  
 24 Code, Section 2332a(a)(3); Possession of Firearms (Machineguns) in Furtherance of  
 25 Crimes of Violence, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii);  
 26 and Unlawful Possession of Firearms, in violation of Title 18, United States Code,  
 27 Section 922(g)(1), and that, as set forth in Attachment B to this Affidavit, attached hereto  
 28 and incorporated by reference herein, property, evidence, fruits and instrumentalities of

1 those offenses are located at the SUBJECT PREMISES, including:

2 a. items of dominion and control of the premises, to include utility bills,  
3 telephone bills, correspondence, business records, and identification documents;

4 b. weapons (including but not limited to firearms and explosives) and  
5 ammunition, as well as accessories and equipment associated with weapons (including  
6 but not limited to equipment for cleaning and maintaining weapons, magazines, scopes,  
7 silencers, holsters, carrying cases);

8 c. material and documentation related to any plans to attack a military  
9 facility and/or to kill members of the United States Armed Forces, including but not  
10 limited to maps, diagrams, floor plans, lists of items to be acquired or steps to be taken,  
11 and research materials (such as books, manuals, Internet printouts, or any other material)  
12 related to weapons, explosives, tactics, the location of possible targets, or directions to  
13 possible targets;

14 d. material related to the defendants' stated motivation (as described  
15 herein) for their conspiracy to attack a military facility and/or kill members of the United  
16 States Armed Forces, including but not limited to material (including books, Internet  
17 printouts, and video and audio recordings) related to the presence of the United States  
18 military in the Middle East, and alleged atrocities committed by United States military  
19 personnel in the Middle East;

20 e. communications, in any form, between ABU KHALID  
21 ABDUL-LATIF, a/k/a JOSEPH ANTHONY DAVIS, and WALLI MUJAHIDH, a/k/a  
22 FREDERICK ANTHONY DOMINGUE, JR.; and the person referred to herein as the  
23 "Source;"

24 f. address books, directories, or contact lists;

25 g. documentation, records, or receipts related to any plans to attack a  
26 military facility and/or to kill members of the United States Armed Forces;

27 h. All bank and financial records, including but not limited to bank  
28 statements, cancelled checks, bank signature cards, deposit and withdrawal records, ATM

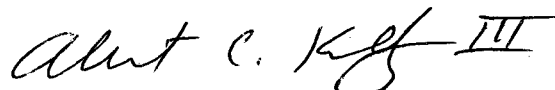
1 receipts, and safe deposit records, for the year 2011.

2 i. cellular phones; and

3 j. electronic storage media, including but not limited to computers,  
4 hard drives, compact disks, and floppy disks. *At the present time, the Government seeks*  
5 *the limited authority only to seize such items, and will not search such items without*  
6 *seeking further authorization of the Court.*

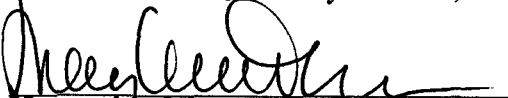
7 **Conclusion**

8 65. Based on the above information, I respectfully submit that there is probable  
9 cause to believe that the following offenses have been committed: Conspiracy to Murder  
10 Officers and Employees of the United States, in violation of Title 18, United States Code,  
11 Sections 1114 and 1117; Conspiracy to Use Weapons of Mass Destruction, in violation of  
12 Title 18, United States Code, Section 2332a(a)(3); Possession of Firearms (Machineguns)  
13 in Furtherance of Crimes of Violence, in violation of Title 18, United States Code,  
14 Section 924(c)(1)(B)(ii); and Unlawful Possession of Firearms, in violation of Title 18,  
15 United States Code, Section 922(g)(1), and that, as set forth in Attachment B to this  
16 Affidavit, attached hereto and incorporated by reference herein, property, evidence, fruits  
17 and instrumentalities of those offenses are located at the place described in Attachment A  
18 to this Affidavit.

19  
20 

21 ALBERT C. KELLY, III, SPECIAL AGENT  
22 Federal Bureau of Investigation

23  
24 Subscribed and sworn  
25 before me this 22 day of June, 2011

26 

27 Honorable Mary Alice Theiler  
28 United States Magistrate Judge

**ATTACHMENT A**  
**PLACE TO BE SEARCHED**

The places to be searched is the SUBJECT PREMISES, a residence located at 3726 South 180th Street, Apartment E 304, Tukwila, Washington. The SUBJECT PREMISES is located in Hunt Club Apartment complex, on the third floor of a building marked with an "E", as described in Attachment A to this affidavit, attached hereto and incorporated by reference herein. The bottom half of the building is brown, the top half is light tan, and a thick dark brown strip separates the top and bottom halves.

**ATTACHMENT B**  
**ITEMS TO BE SEARCHED FOR AND SEIZED**

The items to be seized are the following items or materials that may contain evidence of the commission of, the fruits of, or property which has been used as the means of committing the following offenses: Conspiracy to Murder Officers and Employees of the United States, in violation of Title 18, United States Code, Sections 1114 and 1117; Conspiracy to Use Weapons of Mass Destruction, in violation of Title 18, United States Code, Section 2332a(a)(3); Possession of Firearms (Machineguns) in Furtherance of Crimes of Violence, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii); and Unlawful Possession of Firearms, in violation of Title 18, United States Code, Section 922(g)(1):

a. items of dominion and control of the premises, to include utility bills, telephone bills, correspondence, business records, and identification documents;

b. weapons (including but not limited to firearms and explosives) and ammunition, as well as accessories and equipment associated with weapons (including but not limited to equipment for cleaning and maintaining weapons, magazines, scopes, silencers, holsters, carrying cases);

c. material and documentation related to any plans to attack a military facility and/or to kill members of the United States Armed Forces, including but not limited to maps, diagrams, floor plans, lists of items to be acquired or steps to be taken, and research materials (such as books, manuals, Internet printouts, or any other material) related to weapons, explosives, tactics, the location of possible targets, or directions to possible targets;

d. material related to the defendants' stated motivation (as described in the affidavit of Albert C. Kelly III) for their conspiracy to attack a military facility and/or kill members of the United States Armed Forces, including but not limited to material (including books, Internet printouts, and video and audio recordings) related to the presence of the United States military in the Middle East, and alleged atrocities committed by United States military personnel in the Middle East;;

e. communications, in any form, between ABU KHALID ABDUL-LATIF, a/k/a JOSEPH ANTHONY DAVIS, and WALLI MUJAHIDH, a/k/a FREDERICK ANTHONY DOMINGUE, JR.; and the person referred to in the Affidavit of Special Agent Albert C. Kelly, III, as the "Source;"

f. address books, directories, or contact lists;

g. documentation, records, or receipts related to any plans to attack a military facility and/or to kill members of the United States Armed Forces;

h. All bank and financial records, including but not limited to bank statements, cancelled checks, bank signature cards, deposit and withdrawal records, ATM receipts, and safe deposit records, for the year 2011.

i. cellular phones; and

j. electronic storage media, including but not limited to computers, hard drives, compact disks, and floppy disks. *At the present time, the Government seeks*



1 *the limited authority only to seize such items, and will not search such items without*  
2 *seeking further authorization of the Court.*