A380-043018-03

CS NO. 18045858

Warrant No: 18-135

Collin County

AFFIDAVIT FOR ARREST WARRANT

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS

Before me, the undersigned authority, on this day personally appeared the undersigned affiant who, after being by me duly sworn on oath deposes and says that, **Matin Azizi-Yarand**, hereinafter styled defendant, on or about the **30th** day of **March** , **2018**, and before the making and filing of this complaint, in the County of **Collin** of the State of Texas, did then and there commit the offense:

Criminal Solicitation (PC 15.03)

My name is M. Seelye #3139, and I am a Peace Officer under the laws of The State of Texas. I am a Detective with the Frisco Police Department, currently assigned to the FBI Joint Terrorism Task Force as a Task Force Officer on the Counter Terrorism Squad in Frisco Texas. I have more than 18 years of law enforcement experience and currently hold a Master Peace Officers license. I have approximately 1480 hours of training in various Police and FBI Counter Terrorism classes as well as an Associate's Degree. I am one of the detectives responsible for investigating this case, and I will serve as Affiant for this Affidavit. I have reviewed the recorded communications between Matin Azizi-Yarand and FBI Confidential Sources and an Undercover Employee and can attest to the following:

Matin Azizi-Yarand (MATIN) was born on November 22, 2000, and is 17 years old. He is a high school student and resides at 4836 Bear Run Dr., Collin County, Plano, Texas, with his mother and father.

In December 2017, MATIN began communicating online with an FBI Confidential Human Source (CHS) about his (MATIN's) desire to either "make hijrah [Travel]" or to conduct a terrorist attack within the United States. On December 7, 2017, MATIN and the CHS communicated on a mobile messaging application (MMA1). In order to establish bona fides with the CHS, MATIN explained his position by stating the following:

"Look at all the other lone wolves // What training did they have yet they simply killed the kuffar? [Arabic for "disbelievers"] // the brothers in Europe the brother in Spain the brother in New York? Had no limitary training // it's not about numbers it's about getting a message across to these taghut countries // it's dangerous tho akhi we have to be careful some have gotten arrested // so we good brother?"

When the CHS responded with "ok," MATIN continued by stating he had planned to wait until he turned 18 to conduct an attack so that he could purchase a rifle himself. He added: "But I swear I want to achieve Allahs [Gods] pleasure and kill the kuffar" and "I've only been reading ISIS magazine guides for performing operations and making bombs." MATIN told the CHS he learned about Islam on the internet "when I first wanted to learn the truth about Dawlah Islamiya [ISIS]."

During this December 7, 2017 discussion, the CHS asked if MATIN had reached out to the brothers in the "dowlah" to see how MATIN could help, to which MATIN replied, "in their magazines they have claimed it is not about how many Kill but how much money you will make these countries spend in security just for a simple attack // although having a high number will get their attention." The two agreed that there needed to be a "plan b," and the CHS asked if MATIN had given the operation much thought and if a target had been selected. MATIN answered: "Yeah I've played some scenarios in my head akhi, lol I don't plan to go in blind" and "yes I want to put America in the state that Europe is in which is having to have soldiers deployed in streets" and "something that will cost them a lot financially too."

In multiple conversations with the CHS, MATIN discussed the possibility of making hijrah to another country. On December 16, 2017, MATIN told the CHS on MMA1 that he met a "brother" who had been arrested while trying to make

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hijrah to Syria. MATIN noted that "Dawlah has said in their videos the way to sham is alot harder than before // I think it's not even possible because turkey upgraded their borders. Only play would be Libya or Marawi in Philippines." MATIN then sent an image to the CHS with the title "Hijrah Islamic State" and told the CHS, "Guide from 2015. When it was easy to get there. It has stories from other people who made hijrah it's very nice." In multiple conversations, MATIN explained that he would like to travel to Pakistan, then cross the border to Afghanistan to join ISIS. On January 3, 2018, MATIN informed the CHS that MATIN knows an individual who resides in India who has information on hijrah to Libya and has invited MATIN to travel with him. MATIN stated that he was connected to this individual through MMA2. MATIN also stated that he would use MMA2 to find like-minded brothers to assist with an attack.

Throughout their numerous online conversations, MATIN sent the CHS various types of ISIS propaganda. On December 10, 2017, MATIN sent the CHS a link to a five-minute video about life in the Islamic State. On December 11, 2017, MATIN used MMA1 to send the CHS a link to a ten-minute video about being a martyr [One who is killed for their beliefs] in the West. On December 15, 2017, MATIN spoke to the CHS via MMA1 and sent the CHS an image entitled "A Brief Guide to the Islamic State (2015)" and then told the CHS "I'll send you the PDF In sha Allah [God Willing]." On December 16, 2017, MATIN sent an image to the CHS that shows the ISIS flag and a firearm, and bears the text "Jihad [Struggle/Fight] and the rifle alone. NO negotiations, NO conferences and NO dialogue." On December 21, 2017, MATIN asked the CHS if they could move their conversation to a different online messaging application, because MATIN was "more comfortable with that and u can get into ISIS channels."

On December 22, 2017, MATIN sent a two-page document to the CHS via the MMA1 messaging application. The document, which was originally authored by Eric Harris (one of the attackers in the 1999 shooting at Columbine High School), contains detailed instructions on how to build pipe bombs. MATIN also sent the CHS a link to a video which he described as a "video showing how to stab/make a bomb." After sending the link to the video, MATIN stated "skip about halfway if you just want to see the bomb making // first half is knife attacks." When asked by the CHS where MATIN finds these types of materials, MATIN responded "magazines." MATIN then sent the CHS a link to "Inspire" magazine, which I know through my training and experience is published by the designated foreign terrorist organization Al Qaeda in the Arabian Peninsula.

On December 25, 2017, MATIN invited CHS to come to Dallas. MATIN stated, "When the time akhi comes I want you to come down here // if you are willing to that is // just need some more planning." CHS responded "I am here for you as much as Allah enables me." MATIN then said "there is a Hindu temple I want to shoot up // get some crappy car and ditch it somewhere // police response time here is really slow." When CHS asked "when r u thinking about executing this," MATIN replied, "when I get a proper gun ... unless you want me to go stabbing them ... Get [sic] a brother to buy an assault rifle and just give it to me."

The nature of communication between MATIN and CHS consistently pointed to supporting ISIS by making hijrah or committing a violent attack in the United States. The effect of these communications to CHS was that MATIN requested and attempted to induce him/her to commit the crime with MATIN.

In January 2018, MATIN began communicating with an FBI Undercover Employee (UCE) and continued having discussions about whether to make hijrah or conduct an attack in the United States. On January 20, 2018, MATIN told the UCE "me and others are planning // either hijrah or here // We are hoping for hijrah In sha Allah // we just need the funds." MATIN then said "Yeah we found a person willing to take us // Alhamdulilah // it's to wilayat [ISIS Province] in Afghanistan." Later in the same conversation, MATIN told the UCE "My thinking is basically try to support the state first by making hijrah if you can't then here is a second option." He then stated "Hijrah or here // That's what I struggle." On January 5, 2018, MATIN asked the CHS: "also if I stay here would you want to stay with me and do an operation bc I can get ahold of weapons easily with no criminal record or u still want to make hijrah." MATIN then said "What's ur plan bro I'm not saying we have to be together it seems like you want to follow me through with this whole thing." On January 6, 2018, MATIN told the CHS "I read article from isis // Speaking on the matter of civilians // They say it's better to attack them here and make them scared so it discourages them."

On January 16, 2018, MATIN informed the UCE that he (MATIN) gets paranoid sometimes talking on Facebook and advised he has a mobile messaging application (MMA2) where he posts photos. MATIN then sent the UCE a screen shot

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of his MMA2 account. MATIN warned the UCE about spies on Facebook and joked about getting a knock on his door and getting big smiles from men in suits. The UCE asked MATIN about a quote that MATIN had posted on his MMA2 account. MATIN replied "Oh it's from baaghdadi [ISIS leader al-Baghdadi]." The UCE asked it if is safe to post those kind of things on MMA2, and MATIN replied "Yeah, I mean they might ban you but you should be fine In sha Allah, I thought it was kind of obvious I supported them."

MATIN also told the UCE and the CHS about other individuals he spoke to online. On January 20, 2018, MATIN told the UCE "Me and the 2 other guys are serious about this we are willing to do something here alhamdulilah but they've been waiting for me to turn 18 to be able to buy the guns // But I realized if we gonna wait that long we can try hijrah // Just don't be scared of dying, it's like a short sting // Then you're in front of Allah. // Other brothers in this country and else where have fought against them not being scared // Some under prepared though. // Being captured is a bad thing // Life is over forever in jail."

On January 27, 2018, MATIN explained to the CHS that he had been saving money and that he had $890 plus an additional $500 in checks. MATIN stated that his mother was in possession of the checks and that she would provide them to MATIN when it was time for him to travel Pakistan. During the same conversation with the CHS, MATIN explained to the CHS the six steps he believes are essential for the group to make hijrah, including obtaining about $3,500 – $4,000, applying for a visa to Pakistan, and flying to Pakistan. Once in Pakistan, MATIN explained that the group would "Meet the smuggler give him the money and he will get us to a safe house and take us across the border (we might not get all taken at the same time)." He then explained that "someone from Dawlah gets us once we are in Afghanistan," and that the final step would be "Training camp // then fighting."

On January 26, 2018, MATIN told the CHS "ISIS has said attackers in the West is more valuable to them than a Istishadi . . . I think we are more valuable to the state doing something here." On January 29, 2018 MATIN told the CHS that "The isis guy said // We should attack America. . . . Are you fine with killing some Americans." MATIN then said he had asked his contact in ISIS about how to conduct an operation with no training, and that his contact "said guns are simple just open fire." MATIN added, "Paris attackers had no experience // They got hundreds," and "how hard can it be to spray down a big crowd of people // Las Vegas the dude was just blind firing // And got 100." MATIN also stated, "We can still do hijrah no problem // But then we're just like the rest."

When discussing the possibility of a domestic attack, MATIN named potential targets. On December 19, 2017, MATIN told the CHS "School is a perfect place for an attack. Crowded and close quarters. lol. Even a blind man could take 10 easily. just fire where u hear screams." On January 10, 2018, MATIN told the CHS "I don't remember if I told you but they recommend to go and fight in your own land bc if you make hijrah you're just another soldier nothing special also let's look at it this way we spend 5000 each on top of a plan ticket to make hijrah to Afghanistan but if put 15,000 towards jihad here ultimately the destruction and outcome would be greater." On January 18, 2018, MATIN told the CHS that MATIN would be a "genius with our jihad plans."

On February 7, 2018, MATIN told the UCE "I think what I want to do is stay here and fight" and "when I go outside the house I look around and I see people who deserve. And when we attack them they question why their country is fighting the Muslims // Or Not // Maybe it's just useless // idc // idk."

On February 18, 2018, the UCE pointed out to MATIN that "You were having doubts like 2 weeks ago." MATIN responded "Yeah but that would about Islam // Not fighting." MATIN added "Everything has pointed me into this path. When I first became Muslim fighting was a big part of why I came to this religion. I saw men facing so many tribulations but remained steadfast and believed in Allah. That's one of the Core things that led me to convert seeing the strength the Muslims had."

In March 2018, MATIN met another Confidential Human Source (CHS 2) online, and began speaking to him/her about his (MATIN's) plans to conduct a domestic attack. CHS 2 expressed interest in participating in the attack. When CHS 2 asked about MATIN's allegiance to ISIS, MATIN made clear that his attack would be on behalf of ISIS. Specifically, MATIN said, "What other groups have you seen brave enough to slaughter the kuffar? // Only sons of the Islamic state have ben brave enough // This is only for dawlah and my Amir is abu bakr al Baghdadi // Not for any other cause not for any other

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banner this is under Dawlah for Allah." MATIN then informed the UCE and the first CHS that a brother might be able to join the operation.

On March 15, 2018, MATIN advised the first CHS he was scouting the target location and saw many Muslim "sisters" there. MATIN said to CHS, "If we did an attack we would have to advise them to get away," to which CHS replied, "yes."

On March 17, 2018, MATIN confirmed with CHS that CHS did not want to make hijrah, so MATIN said "Then we will start planning" which led to a conversation about renting an apartment and other logistics for traveling to the DFW area in preparation for the attack. Over the next few days, MATIN continued to send CHS pictures of Stonebriar Centre Mall and general tactical gear needed for the attack and said "we need to start ordering stuff ... soon as possible." MATIN also told CHS to "make sure you pay off any personal debts." On March 30, 2018, MATIN said to CHS, "I'm not getting martyd without you."

On March 27, 2018, MATIN instructed the UCE "We have some planning to do lol if you're still on this path," and "I've got a lot of stuff planned out/new contacts." He further told the UCE that MATIN had found an additional contact that could assist with weapons and that he had chosen the target to be a shopping mall during Ramadan "iftar time//To limit Muslim casualties." The UCE told MATIN that he (the UCE) needed to be sure the plan is thought out," to which MATIN responded, "Yeah we'll get your but over here and you can see first hand // you're not gonna go in blind // lol // you're gonna learn the layout of the mall and number of security and such In sha Allah." MATIN explained the layout of the mall and his observations of patrons and security personnel there. MATIN also stated he planned to cause financial damage as well, "setting stores on fire // gasoline // match // we won't suffocate to death lol we can shoot open weapons." MATIN then sent three pictures of the Stonebriar Centre mall to the UCE and provided the UCE with the name of the mall and its location. The UCE responded "I'm not killing Muslims akhi." MATIN replied "Yes that's why I said Ramadan//iftar Time//No Muslims are going to be at a mall when it's time to be breaking your fast//In sha Allah." MATIN added "We can be even more careful if you'd like and take hostages and assess which ones we can kill letting go the elderly and the children."

During the conversation about the mall MATIN and the UCE talk about security and Police Officers, MATIN states "I'd actually like to make a cop surrender and drop his gun//Then douse him with gasoline and burn him//record it."

On March 27, 2018, MATIN instructed the UCE "you need to start asap on getting equipment," then says "I got 1000 in cash // you ain't my sugar daddy smh." MATIN further explained that "I'll try to get a prepaid card // and I'll just give you the info // of it // and you buy the stuff online." MATIN detailed that the prepaid card would be for the plate carrier and AR500 plates. In terms of further discussing needs for the operation, MATIN said "firstly is guns // then ammo and magazines // second is a decent plate carrier that holds a lot of magazines // if we have enough money you can get a bullet proof mask // I wear glasses so that won't work." [NOTE: On April 24, 2018, MATIN told the UCE that he was getting contact lenses so his glasses won't impede their operation.] MATIN also instructed the UCE that the CHS would need two plates because of his large stature. He further stated that "I want at least 10 magazine each person for this operation // if not more" and sent a picture of a large tactical backpack he liked to hold more magazines and the gasoline to burn the stores. MATIN provided an ebay link to the backpack. He instructed UCE to "check out locally and send me some pictures," referring to the carriers. MATIN sent photos to the UCE of "plate carriers," which are military-style apparel that contain a metal plate and can be worn as a type of bullet-proof vest. MATIN wanted himself, the UCE, and the CHS to wear these vests during the operation, and noted that the particular plate carrier he had selected "can hold 12 mags [magazines]." MATIN remarked that bullet proof plates are "cheap" and would cost a total of $600 for all three shooters (himself, the UCE, and the CHS). He then said "I'm fond for the plate carrier I found because it can hold many magazines."

When the UCE asked if the plan had been thought through, MATIN replied "Like I said I don't expect u to go in blind you're going to have several days In sha Allah to go see the place and make notes of what's up // you can't shoot up [sic] a place you've never seen // you'd just be confused // the more you see it the more comfortable you'll be // which will make the operation go smoother In sha Allah." MATIN also told UCE to "take note of increasing cardio // try going to the gym // increasing stamina // can't shoot out of breath and shaking // because remember we ain't shooting paper targets."

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During the March 28, 2018 conversation in which he described his plan to attack the shopping mall, MATIN also told the UCE that he would send a copy of the "speech" he had written and sent to the "other brother" he had told about the attack. On March 28, 2018, the UCE received an electronic email invitation to open a document via Google Docs. The invitation was sent from a user named "Mech." The email address from which the invitation was sent was associated with MATIN. Excerpts of the speech are provided below:

a) "This is a message for america and any other country that is fighting islam and slaughtering the muslims with their fighter jets and other such weaponry. Due to the fact you're scared and don't want to face the mujahideen. You have brought this upon yourself America, you take the people's taxes and use it to finance your war against the muslims. We will continue these attacks until you relent your airstrikes on us."

b) "before you call us evil people look your selves this is only revenge you have started this war with us it will never end. We target your people as revenge for ours who were slaughtered. . . . You can move to another country that is not fighting the muslims but of course you want your easy lives in america so we will cast terror into your hearts as Allah commanded us. We will spill your blood as you have spilled ours more believers like us will answer the call to that which gives them life which is jihad."

c) "And now a brief message for the muwahideen [Islamic fighter] like us behind enemy lines. Do not give up do not be weak stand up for Jannah as we have done. Make the kuffar tremble. Cast terror into their hearts. Hijrah is possible to other lands than asham. Go forth and support your brothers."

On March 29, 2018, MATIN informed the UCE that "I'm gonna be filling up a card with some money." The UCE told MATIN that the UCE had opened a Post Office Box where the money could be sent. The UCE and MATIN then discussed different ways that the items for the operation could be purchased, and whether it was better to purchase the items online or at a store. Later in their conversation on March 29, 2018, the UCE sent the address for the P.O. Box to MATIN.

On the morning of March 30, 2018, MATIN sent a photo of a hand (presumably MATIN's hand) holding a large amount of cash. Later in the conversation, he stated "Yeah I plan to send you the debit card either today or tomorrow."

In the evening on March 30, 2018, MATIN told the UCE he was buying the prepaid card and going to Fed Ex. MATIN sent the UCE a picture of the VISA Green Dot pre-paid card he had purchased, and stated that he had to provide his Social Security number, telephone number, and address in order to obtain the card. Although MATIN had brought $1,000 with him to put on the card, he stated "It's filled with $500 // Honestly you should've given me your SSN // And I could've filled it with more money // It detected I'm under 17 // And capped it."

Later in the day on March 30, 2018, MATIN sent the UCE a photograph of an envelope that MATIN had addressed to the UCE, which MATIN said contained the VISA Green Dot pre-paid card that MATIN had purchased. Approximately one week later, on April 8, 2018, MATIN sent the UCE a photo of the stamps he purchased to mail this same envelope, and also sent a picture of the envelope with two stamps on it. MATIN then sent a video of himself placing the envelope into a Post Office mailbox. On April 13, 2018, the UCE sent MATIN photos of items the UCE claimed to have purchased with the VISA Green Dot pre-paid card that MATIN sent.

On March 30, 2018, after purchasing the VISA Green Dot prepaid card, MATIN visited the shopping mall to conduct surveillance. He told the UCE "I scouted it [the mall] out // The security guards don't even have guns lmao // I saw 3 [guards] // 2 in a pair one alone // They just have some pepper spray // And I was looking for the cop upstairs in the movie theatre area // Didn't see him." MATIN then sent the UCE a photograph of two security guards riding the escalator in the mall. MATIN wrote, "The mall has 3 levels // Main entrance is on middle area." MATIN then sent another photo, with the comment "Outside restaurant near front entrance." MATIN also commented "Movie theatre stays open until 12 // And they have a restaurant that stays around later // It's biggest attraction in my city."

Shortly after sending the photos, MATIN stated "you better find good deal on ammo. . . . I'm expecting each of us

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having 10 mags each minimum // So for that you'd need 900 rounds." He also stated "the plate carriers should fit a 10x12 plate // that's my requirement for the carrier" and "Also I'm planning to get a jerry can filled with gasoline // to burn stores."

On March 30, 2018, MATIN told the CHS about the security at the mall "Security//I checked//Justbpeoer slray//Pepper spray//Yes, I am here right now//checking the place out//Counted 3 security //1 cop upstairs with an actual gun//In movie theatre area//Yes yes real cop real gun//Notpretend cops//He's not gonna super hero and dome us all//if you'd want we could take him out first//Shouldn't be a problem."

On April 13, 2018, MATIN told the UCE he "got a bonus of cash" and that he was going to send two different envelopes to the UCE. On April 14, 2018, MATIN told the UCE "I'm sending two envelopes." He then took a photo of two different envelopes, both addressed to the UCE at the same address where MATIN had send the prepaid Green Dot VISA card. MATIN then sent the UCE a video of himself placing the envelopes in a U.S. Post Office mailbox. The envelopes arrived at the UCE's stated PO Box on April 17, 2018, and were collected by the FBI. One envelope contained $590 in cash and the other envelope contained $400 in cash. In addition to the VISA Green Dot prepaid card, the total amount of money that MATIN has now provided to the UCE to purchase supplies for the operation is approximately $1,462.36.

On April 14, 2018, MATIN met in person with the CHS, who told MATIN that he/she was passing through the area on work-related travel. MATIN used Uber to travel from his residence to the hotel where the CHS was staying. At approximately 10:43 am, MATIN met the CHS in the lobby of the hotel and then went to the CHS's room. While in the room, MATIN stated he was excited about the photos he had received from the UCE with pictures of the plate carriers, ballistic plates, and ammunition that the UCE had purchased. MATIN informed the CHS that MATIN sent the UCE two envelopes in the mail with a total of $1,000 in them. MATIN asked the CHS if he/she wanted to go to the mall, and noted that when he (MATIN) last went to the mall, it was 7:00 or 8:00 and that "a good amount of people" were there at that time. When asked by the CHS what the plan for the operation was, MATIN stated the plan is "not too in depth" and said they would "just run and gun." MATIN stated that "there's nothing goin to stop us . . . the entrance . . . it's like an open place." MATIN added that he had observed the security personnel in the mall and "none of them have guns. MATIN then commented that in one month, when they carry out the operation, they will need to transport the rifles to the mall in suitcases, "cause they're long dude because you can't just stick it in a back pack, the barrel is going to be sticking out." MATIN also told the CHS that he was trying to convince the UCE to let CHS 2 join the operation.

After meeting in the hotel room, and at MATIN's suggestion, MATIN and the CHS walked to the shopping mall, which is less than one mile from the hotel where the CHS was staying. The CHS mentioned the possibility that patrons in the mall could be carrying concealed weapons, and could draw those weapons when the operation begins. MATIN stated "I wonder if we should get pistols" and then commented that they will "want more ammo, a lot more magazines." MATIN then stated that he did not believe a cop would "try and take us on," and noted that during the recent school shooting in Parkland, Florida, the security officer at the school "ran outside . . . a lot of people are mad at him." Throughout his time with the CHS at the hotel and at the shopping mall, MATIN exchanged messages with the UCE and sent the UCE photos of what MATIN and the CHS were doing together. MATIN also sent the UCE a photograph from the shopping mall and stated "Found their security office // Also // We saw a cop // He had a glock and two mags back up // Along with tazer // And mace // Pepper spray."

On April 16, 2018, two days after his in-person meeting with the CHS, MATIN talked to the UCE again about the operation and said "Btw I have genius idea how to take out the cop // like before we even start the op." MATIN suggested they walk into the mall in "regular clothes" before the operation begins and "surprise attack" the cop. MATIN also said "once we figure out where the cop is we can figure out which entrance to storm through so we can meet up quicker." MATIN and the UCE talked about the attack and the UCE joked with to MATIN stating "I hope you go deaf in the attack," MATIN responded "Nibba I'm gonna get martyed In sha Allah LOL." MATIN also asked the UCE if he/she had received the additional envelopes of cash that MATIN mailed on April 14, 2018.

On April 18, 2018, MATIN reached out to the UCE and told him/her to check the PO (Post Office) after work. Later in the day the UCE sent MATIN a picture of the PO Box with the two envelopes MATIN had sent him. MATIN told the UCE "the surprise was it's about 1000, In cash, not 500." The actual amount in the envelopes was $400 cash in one and $590 cash

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in the other, for a total of $990.00 in US currency. In the continued conversation, MATIN sent a YouTube link to a video of a person shooting an AR-15 type rifle, the title of the video is "slide fire 100 round mag", the UCE asked "That drum?" MATIN responded "Eh I don't trust drums for reliability I just wanted to show more for the slide fire stock it has//My rifle needs to be pretty and cool looking//put an I love America sticky on the side."

In the April 18, 2018 conversation, MATIN told the UCE "The only way we can fail is 1 second into the operation someone accidentally shoots someone in the head or the vest." MATIN listed his four points of the attack;

1. Message gets across to the kuffar

2. Inspires others

3. we followed what Allah commanded us and filled them with fear

4. We let others know that we were among those who will not accept weakness or humiliation"

MATIN continued his statements and told the UCE "Only glory and returning of honor for Islam, this is surely the only way and best thing we can do as our situation is//and ultimately it will make the kuffar wonder why these things happen//And will point their fingers at their government//they promised to keep them safe from terrorism but they will fail once again In sha Allah"

On April 20, 2018, MATIN reached out to the UCE and said "btw still thinking about the cop thing surprise attack, remember, pull a glock Pop pop pop from behind or whatever." The UCE responded "Right. What are you thinking about? Something different?" MATIN responded "I mean the way I have it envisioned is we first go in (probably not with the rifles) glock In waist holster or whatever determine wherever the cop is and then one stays which is the one who will kill him and The other 2 will go and get the rifles and come or whatever, After you hear shots Coming from the inside" The UCE responded "Who would do it u think? Or does it matter?" Matin responded "Confirming the cop is dead//I'll do it im fine and you'll carry an extra rifle on your back and bring it//or meet up whatever." The UCE replied "That would work." MATIN continued "Yeah//I'd probably take the glock and the revolver in case one is jammed or something idk." The UCE replied "we could be close by I guess too." MATIN responded "Well depends what store or area the cop is in." The UCE asked "Is the cop always in the same spot? Or does he walk around?" MATIN replied "Walk around// I've seen him once in the movie theatre area and once in the Apple store."

The nature of communication between MATIN and the UCE consistently pointed to committing a violent attack in the United States and the supplies they would need to carry out the attack. The effect of these communications to the UCE was that MATIN requested and attempted to induce him to commit the crime with MATIN and to provide supplies for the attack.

MATIN's threats to commit mass shootings constitute a violation of Texas Penal Code 22.07 (Terroristic Threat), a third degree felony.

Matin Azizi-Yarand is accused of violating TPC 15.03, Criminal Solicitation with the intent to commit a Capital Felony, to wit; Capital Murder of a Texas Peace Officer, a First Degree Felony; and intentional murder in the course of committing or intention to commit Terroristic Threat, a First Degree Felony.

As a condition of Bond, the Affiant request Matin Azizi-Yarand be equipped with an electronic monitoring device, as well as being restricted from using any electronic devices that have the ability to access, or use, any social messaging applications or electronic communications.

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Wherefore, premises considered, the Affiant respectfully requests that an arrest warrant be issued for the arrest of **Matin Azizi-Yarand** to answer for the **1st Degree Felony** offense of **Criminal Solicitation** in accordance with the laws of the State of Texas:

AGAINST THE PEACE AND DIGINTY OF THE STATE OF TEXAS

MICHELE MILLER
My Notary ID # 128047736
Expires September 16, 2021

M. Sulya

AFFIANT

SWORN TO AND SUBSCRIBED BEFORE ME ON THIS

30th day of April, 2018.

Michele Miller

NOTARY PUBLIC

MAGISTRATE'S DETERMINATION OF PROBABLE CAUSE

On this the 30th day of April 2018, the undersigned Magistrate hereby acknowledges that said Magistrate has examined the above affidavit and has determined that probable cause exists for the issuance of an arrest warrant for the individual accused of the offense set out therein.

Richard Davis

MAGISTRATE