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Approved: _____
SHAWN G. CROWLEY/SIDHARDHA KAMARAJU/JANE KIM
Assistant United States Attorneys

Before: HONORABLE DEBRA FREEMAN
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	**SEALED COMPLAINT**
- v. -	Violation of 18 U.S.C. § 2339B
KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee,"	
Defendant.	

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SOUTHERN DISTRICT OF NEW YORK, ss.:

GEORGE MURPHY, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization)

1. From at least in or about April 2016, up to and including in or about May 2017, in the Southern District of New York and elsewhere, KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and others known and unknown, knowingly did combine, conspire, confederate and agree together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and

Nationality Act ("INA"), and is currently designated as such as of the date of this Complaint.

2. It was a part and an object of the conspiracy that KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and others known and unknown, would and did knowingly provide ISIS with "material support or resources," including, among other things, personnel, services, training, and expert advice and assistance, knowing that ISIS was a designated foreign organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and others known and unknown, committed the overt acts set forth below, among others:

a. In or about April 2016, VO joined an online group that pledged allegiance to ISIS and committed to carrying out online attacks and cyber intrusions against Americans.

b. Between in or about January and February 2017, VO recruited other individuals to create online content in support of ISIS, which included a video threatening a non-profit organization based in New York, New York.

(Title 18, United States Code, Sections 2339B.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I am a Special Agent with the FBI, and I am assigned to a squad within the FBI responsible for the investigation of, among other things, cyber-intrusions, including those conducted by terrorist organizations. I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement agents and other people and my examination of reports and records prepared by other individuals, including

other law enforcement agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview of the Investigation

5. Based on my training and experience and my participation in this investigation, I have learned that KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, is a 20-year old resident of Hephzibah, Georgia, who participated in and recruited others to join an online hacking group that pledged its allegiance to ISIS, disseminated ISIS propaganda online, and unlawfully accessed and stole personal information from private and governmental computer systems. In particular, the group to which VO and her co-conspirators belonged published videos online calling on ISIS supporters to (a) harm employees of a New York-based non-profit organization dedicated to combating terrorism through de-radicalization efforts, and (b) murder thousands of American citizens through so-called "lone wolf" attacks.

ISIS Background

6. 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 ("FTO") under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA 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 to the FTO listing: the Islamic State of Iraq and al-Sham (i.e., "ISIS"), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. In an audio recording publicly released on June 29, 2014, ISIS announced a formal change of its name to the Islamic State. On September 21, 2015, the Secretary added the following aliases to

the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

7. The State Department has reported that, among other things, ISIS has committed systematic abuses of human rights and violations of international law, including indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of their religion, nationality, or ethnicity, kidnapping of civilians, forced displacement of Shia communities and minority groups, killing and maiming of children, rape, and other forms of sexual violence. According to the State Department, ISIS has recruited thousands of foreign fighters to Iraq and Syria from across the globe and leveraged technology to spread its violent extremist ideology and for incitement to commit terrorist acts.

8. On or about September 21, 2014, now-deceased ISIS spokesperson Abu Muhammad al-Adnani called for attacks against citizens — civilian or military — of the countries (including the United States) participating in the United States-led coalition against ISIS.

9. ISIS has claimed responsibility for the following terrorist attacks, among others: (a) on or about November 13 and 14, 2015, a coordinated group of attackers carried out multiple terrorist attacks in Paris, France, which killed approximately 130 people; (b) on or about March 22, 2016, a coordinated group of attackers carried out multiple bombings in Brussels, Belgium, which killed at least 32 civilians; and (c) on or about October 31, 2017, an attacker drove his vehicle onto a pedestrian walkway and bike path in New York, New York and killed eight people.

10. To gain supporters, ISIS, like many other terrorist organizations, spreads its message using social media and Internet platforms. Using these platforms, ISIS posts and circulates videos and updates of events in Syria, Iraq, and other ISIS-occupied areas, in English and Arabic, as well as other languages, to draw support for its cause.

Background on the United Cyber Caliphate and the Caliphate Cyber Army

11. Based on my training, experience, and involvement in this investigation, I have learned the following:

a. As set forth below, several online groups have pledged allegiance to ISIS and have subsequently carried out cyber-attacks in its name. Since at least 2014, ISIS's use of online communication platforms and social media, along with its use of individuals who support ISIS, began to involve the dissemination and promotion of attacks against the United States via cyber disruptions and intrusions, commonly referred to as "hacking," that involve the unauthorized access or debilitation of computers or similar devices, as well as online accounts or databases.

b. ISIS followers frequently communicate with one another and exchange information through an encrypted messaging application (the "Messaging Application"). The Messaging Application allows its users to send and receive messages in exchanges referred to as "chats," which are private amongst their participants. The Messaging Application also allows users to create "groups" or "channels." Members of a group or channel can communicate with and disseminate information to other members of that user community. The creator of a group or channel has the ability to designate one or more "administrators" to help manage the group or channel. The administrator has the ability to, among other things, add members, remove members, and change the name of the group or channel.

c. ISIS followers have also created websites used to disseminate their messages and recruit members. One such website ("Website-1") provides battlefield updates to ISIS fighters and tips to ISIS members and supporters on operational security measures, including how to evade law enforcement detection. Website-1 includes advice on using encryption and other means to mask one's identity on social media and messaging platforms. Website-1 also includes ISIS-related news, including media releases, fatwas, and pro-ISIS articles providing justification for the use of violence against Western and non-Islamic targets.

d. Between at least in or about 2014, up to and including at least in or about August 2015, an online group called the "Islamic State Hacking Division" ("ISHD"), among other things, carried out cyber intrusions on United States-based websites, and publicly posted messages calling for ISIS followers to attack Americans. For example, on or about August 11, 2015, the then-leader of the ISHD, Junaid Hussain, a/k/a "Abu Hussain al-Britani" ("Hussain"), posted a message on Twitter that contained the names and private personal identifying information of approximately 1,351 United States

service members and government employees, along with the following statement:

> [W]e are in your emails and computer systems, watching and recording your every move, we have your names and addresses, we are in your emails and social media accounts, we are extracting confidential data and passing on your personal information to the soldiers of the khilafah, who soon with the permission of Allah will strike at your necks in your own lands![1]

Ardit Ferizi, another member of the ISHD, obtained the names and information contained in the August 11, 2015 posting through an intrusion on a United States-based website. Ferizi was subsequently arrested and extradited to the United States, where he pleaded guilty to, among other things, providing the above-described information to Hussain.

e. Hussain was killed on or about August 24, 2015. Following his death, a group of ISIS cyber supporters founded the hacking collective known as the Islamic Cyber Army ("ICA"). On or about September 10, 2015, the ICA announced via Twitter its creation and mission, including its commitment to be the "front against the Americans and their followers To support the ISLAMIC STATE Caliphate with all their forces in the field of e-jihad" and its "call [for] all supporters hackers to join us and work with us to target Crusader alliance."

f. As discussed in further detail below, some members of the ICA subsequently created a sub-group of the ICA called the "Caliphate Cyber Army" (the "CCA"). The CCA frequently posted online pronouncements, like the image below, which identified its leaders and announced its allegiance to the ISHD:

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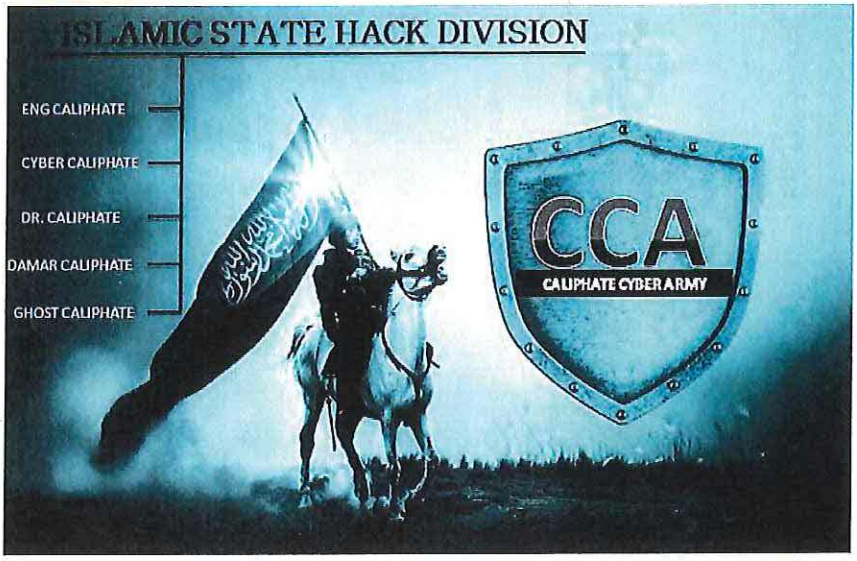
[1] Based on my training and experience, I have learned that "Khilafah" is an Arabic term meaning "the Caliphate," which ISIS supporters often use to refer to ISIS.

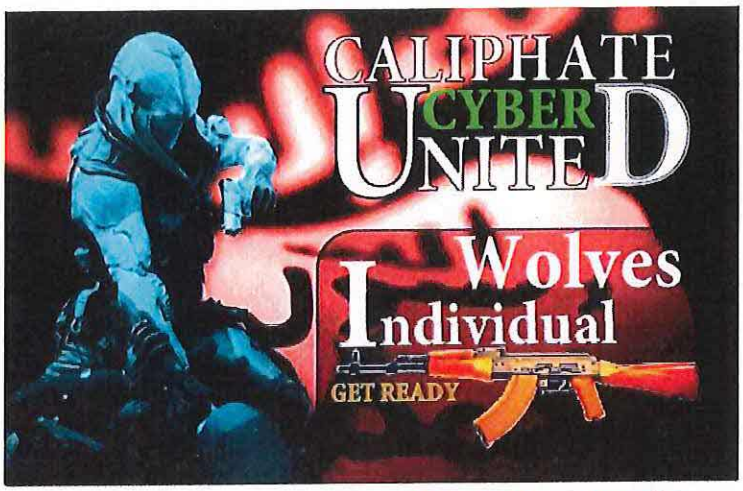


g. On or about April 4, 2016, the CCA publicly announced a merger with other ISIS-supporting hacking groups under the single name United Cyber Caliphate ("UCC"). The announcement, which was posted via Twitter and is depicted below, merged groups such as the CCA, Ghost Caliphate Section, Sons Caliphate Army, and Kalachnikv E-Security Team. Based on my review of the announcement and subsequent postings on social media applications, I believe that the UCC's founders created the UCC as part of an effort to increase and coordinate cyber operations against enemies of ISIS.

h. Since that time, the UCC and its sub-groups, including the CCA, have committed computer intrusions against

private and governmental websites in the United States. In addition, the UCC and its sub-groups, including the CCA, have on several occasions disseminated what the groups refer to as "kill lists," which list the names of individuals - for example, soldiers in the United States Armed Forces and members of the State Department - and instruct their followers to kill the listed individuals.

i. For example, on or about April 21, 2016, the UCC posted via Twitter and Messaging Application-1 the names, addresses, and other personal identifying information, of approximately 3,602 individuals in the New York City area, including residents of this District. The list was posted along with the following message:



List of the most important citizens of #NewYork and #Brooklyn
and some other cities
MORE THAN #3000 NAME

We Want Them #Dead

The Defendant's Interviews with the FBI

12. On or about July 6, 2017, July 31, 2017, and August 16, 2018, KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, contacted the FBI and indicated that she wished to speak with law enforcement. On those dates, VO participated in voluntary, recorded interviews with FBI agents (collectively, the "Interviews").

13. Based on my training and experience, my participation in this investigation, and my review of recordings

of the Interviews, I have learned that, during the interviews, VO stated, in substance and in part, the following:

a. VO worked as part of the Kalachnikv E-Security Team, which pledged allegiance to ISIS.

b. In or about 2016, the Kalachnikv E-Security Team united under the UCC banner with other hacking groups that had pledged allegiance to ISIS.

c. Beginning in at least 2016, VO worked on behalf of the UCC.

d. VO's duties included, among other things, recruiting others to join the group and editing and translating messages that the UCC disseminated online.

e. Although VO worked principally as a recruiter for the UCC, she also helped the group's hacking efforts. In particular, when the UCC decided to hack a particular website, VO would communicate that to one of the group's hackers ("CC-1"). After CC-1 completed the mission, VO would then report that fact to one of the UCC's leaders ("CC-2"), who would publicize the cyber attack.

f. During VO's time with the group, the UCC was first led by an individual VO believed lived in Iraq ("CC-3").

g. CC-3 provided the UCC with a "kill list," that is, a list of names of individuals who were to be targeted by ISIS supporters, for the group to disseminate online.

h. CC-3 ultimately disappeared.[2] After that, members of the UCC discussed which member of the group should serve as the next leader. Some members of the group nominated VO for the position, but she declined. Instead, another individual ("CC-4"), whom VO believed also lived in Iraq, was selected.

i. CC-4 created online forums in which CC-4 discussed the UCC's efforts and attempt to recruit others to join the group as well.

j. In one of these groups, CC-4 encountered a minor (the "Minor") whom CC-4 wanted to recruit into the UCC.

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[2] As set forth in further detail below, VO believed that law enforcement authorities had captured CC-3. See infra ¶ 15(b).

At that time, the Minor was involved in creating online videos that espoused support for ISIS in the style of a popular video game. The Minor lived in Norway.

k. Because of CC-4's limited English and the Minor's limited Arabic, however, CC-4 could not properly communicate with the Minor. CC-4 thus directed VO to recruit the Minor and facilitate the Minor's communication with CC-4.

l. To that end, VO began to communicate with the Minor online. When the Minor asked to join the UCC, VO agreed.

m. VO later regretted bringing the Minor into the group because of the Minor's young age, and had someone she knew try to dissuade the Minor from joining the UCC. Those efforts were unsuccessful, and VO turned her attention to another task on behalf of the UCC.

n. VO communicated with other members of the UCC and potential recruits through, among other things, social media websites and an encrypted messaging application.

o. When using the Messaging Application, VO used various monikers, including "F@ng."

p. VO also used a Facebook profile with the name "Kitty Lee" (the "Kitty Lee Facebook Profile").

The Defendant Becomes a Member of the UCC

14. Based on my training and experience, my participation in this investigation, my conversations with other law enforcement agents and others, and my review of reports prepared by other law enforcement agents, including an FBI undercover employee (the "UC"), I have learned, among other things, the following:

a. Groups affiliated with ISIS, including the UCC, often use the Messaging Application to communicate with each other, due to the Messaging Application's security features.

b. The Messaging Application permits its users to communicate with each other in various ways, including by a direct exchange of messages between two members or through a "channel," which allows multiple users to participate in the same conversation.

c. The UCC operated several different channels in which its members exchanged messages.

d. The UC used the Messaging Application, among other things, to communicate with UCC members online.

15. Based on my participation in this investigation, my conversations with other law enforcement agents and others, and my review of electronic communications gathered through this investigation, I have learned, among other things, the following:

a. On or about April 5, 2016, the UC participated in a group chat in a Messaging Application channel (the "April 5 Group Chat") with members of the UCC, including KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant. VO used the moniker "F@ng." During the April 5 Group Chat, the following conversation occurred[3]:

i. VO posted an image of a social media post that stated, "Three ISIS hacking teams consolidate into United Cyber Caliphate." The post went on to say, "After relying on Almighty Allah and by his grace, incorporation between Islamic State Hackers Teams." The post then identified three "hacker teams," including the Kalachnikv E-Security Team, in which VO later admitted she participated, see supra ¶ 13(a).

ii. After VO and others discussed how the media was reporting the news of the merger, VO wrote "I'm still waiting for them reports and guess what my Acc on Twitter is still up the anons are saying." In or about 2015, the online hacking collective known as "Anonymous" announced that it would target for disruption websites and social media accounts that supported ISIS. It appears that in this message, VO was bragging that Anonymous had still not disabled her Twitter account.

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[3] All descriptions of communications set forth in this Complaint are as to the sum and substance of the communication, and, where applicable, based on preliminary translations that are subject to revision based on further investigation. In addition, any grammatical mistakes, misspellings, and typographical errors in the descriptions of communications in this Complaint appear in the original communication. Finally, in this Complaint, serial messages sent by one user without an intervening communication by another user are delineated by ellipses.

iii. Later in the exchange, another UCC member ("CC-5") wrote, "That article as if [Kalachnikv E-Security Team] isn't ISIS." CC-5 continued "Were all ISIS . . . There acting like [Kalachnikv E-Security Team] is something else."

iv. VO responded "LOL I am Isis."

b. On or about November 12, 2016, the UC exchanged messages over the Messaging Application with VO, who was using the moniker "Miss.Bones." During that exchange, the following conversation occurred:

i. VO wrote "I didn't retired lol. F@ng lives on. But I will take a new name under [CC-3] but it'll be something similar . . . Just so I can bring on a more mass destruction . . . [emoticon of a purple devil face]."

ii. VO wrote "Akhi . . . [followed by four emoticons of crying faces][.]"

iii. The UC responded "yes ukhti . . . What's wrong? . . . Why the crying faces?"[4]

iv. VO answered "[CC-3] . . . And [another UCC member ("CC-6")] my members . . . Are taken from me . . . They were detained by FBI these past months[.]"

v. UC replied "Whaaaaat. How did you know? What happened? . . . I read in the paper about [CC-2] but not those two good bros[.]"

vi. VO then wrote "Yeah . . . [CC-2] was the reason why the other two caught . . . I'll tell you something between us because I'm not allowed to say much outside from the team[.]"

vii. After the UC replied with an Arabic phrase, VO wrote "But, [CC-2] was first to be caught and

[4] Based on my training and experience, my participation in this investigation, my conversations with other law enforcement agents and others, and my review of reports prepared by others and relevant information made publicly available, I have learned that the term "akhi" is a transliteration from Arabic to English script of the approximate Arabic phrase for "my brother" and that "ukhti" is a transliteration from Arabic to English script of the approximate Arabic phrase for "my sister."

detained and along with it authorities had held him detain for months until they found out . . . The other 3 who was working with him." When the UC asked who the "other 3" were, VO responded "So he mentioned to them and they pulled up the bro location, and we're able to trace the 3 members . . . Yeah [CC-3], [CC-6] . . . And [CC-2] . . . Yep." VO continued "[CC-2] got kept and he disappeared and came back telling us all . . . What happen . . . But no evidence on [CC-2] so [CC-2] was free . . . But now the other two [CC-3] and [CC-6] been held for awhilllleeee[.]" Later in the exchange, VO wrote "And we been linked for awhile so . . . I was off for awhile because of this . . . Plus I got visited by FBI again so yeah[.]"

viii. At a later point in the exchange, VO explained, "So [CCA] was closed for security . . . So now they go under UCC . . . Well to[o] late for anything [CC-3] and [CC-6] were individuals that been with former junaid Hussain . . . In hacking before he was announced shaheed [a martyr] . . . After awhile [CC-3] became leader[.]"[5] After the UC agreed, VO continued "And I got through them because they saw my channel . . . And people were telling them about me . . . So I found [CC-3] and I came in and just been with them and now he's gone . . . I must do something[.]"

ix. Later in the exchange, VO claimed that "I left all groups . . . And I'm Actually lucky I did because if I stayed longer . . . I would've had national security . . . Capturing me[.]"

x. At another point in the exchange, VO stated "I'm going to bring a special guest in . . . This person will take down all who stands in the way. And I will recruit during the way. But for it . . . I will recreate a new team I will not get under UCC but I'll be on the side working . . . Because going under UCC is to[o] risky[.]"

c. On or about November 23, 2016, VO, using the "Miss.Bones" moniker, sent the UC a message over the Messaging

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[5] Based on my training and experience, my participation in this investigation, my conversations with other law enforcement agents and others, and my review of, among other things, electronic communications gathered as part of the investigation, I believe that when VO referred to Hussain, she meant Junaid Hussain, the British citizen who engaged in computer hacking on behalf of ISIS, and who is believed to have been killed in or about 2015 by a U.S. airstrike in Syria. See supra ¶ 11(e).

Application, in which VO stated that she used a specific Instagram account (the "Vo Instagram Account").

d. I have reviewed the Vo Instagram Account, and learned the following:

i. The Vo Instagram Account has a certain screen name (the "Vo Instagram Screen Name") and handle (the "Vo Instagram Handle").

ii. The Vo Instagram Account contains several photographs of Vo, including, among others:

I. A photograph of VO with her face partially obscured by a piece of paper on which is written, "[the Vo Instagram Screen Name] from Instagram wishes you all a Happy New Year! @[the Vo Instagram Handle.]"

II. A photograph of VO posing (the "Vo Instagram Photograph").

III. Photographs of VO's purported hacking exploits.

The Defendant Recruits Others to Join the UCC Media Wing

16. Based on my training and experience, my participation in this investigation, my conversations with other law enforcement agents and others, and my review of reports prepared by other law enforcement agents and electronic communications over the Messaging Application, I have learned, among other things, the following:

a. On or about March 20, 2017, Norwegian law enforcement authorities detained the Minor in connection with a counterterrorism investigation into online activity in support of ISIS, including by the UCC.

b. During that operation, Norwegian law enforcement authorities seized and searched electronic media belonging to the Minor (the "Norwegian Media").

c. On or about June 15, 2017, Dutch law enforcement authorities detained another individual ("CC-7") in connection with a counterterrorism investigation into online activity in support of ISIS, including by the UCC.

d. During that operation, Dutch law enforcement authorities seized and searched electronic media belonging to CC-7 (the "Dutch Media").

e. Based on a review of the Norwegian Media and the Dutch Media, I have learned, among other things, the following:

i. The Norwegian Media and the Dutch Media contain screenshots of electronic messages sent over the Messaging Application, including messages sent between the Minor and CC-7. During these exchanges, the Minor used a specific account (the "Minor Messaging Account") with a particular moniker (the "Minor Screen Name"), while CC-7 used another specific account (the "CC-7 Messaging Account").

ii. During these exchanges, the Minor and CC-7 communicated about, among other things, creating videos in support of ISIS that they intended to disseminate online. For example, the two participated in the following conversations:

I. On or about December 12, 2016, CC-7 asked the Minor if "you have channels . . . of dawlah[.]" The Minor responded "of course." CC-7 replied "Mashaalah can you send my 1 all of the I had is deleted . . . And my old phone is at police[.]" The Minor answered, "Hard to get links. they're updating every 4-5 days." CC-7 then wrote, "Yes mashaalah . . . akhi . . . Can you make me a channel photo . . . Flag of tawheid and under Dawlah nasheed[.]" "Dawlah" is a phrase typically used by supporters to refer to ISIS or territory controlled by ISIS. Similarly, "tawheid" is a phrase often used by ISIS supporters to describe their religious ideology. Accordingly, I believe that in this exchange, CC-7 was asking the Minor if the Minor had any channels on the Messaging Application through which pro-ISIS propaganda could be disseminated, because CC-7's own channels have been deactivated. CC-7 also asked the Minor, I believe, if the Minor could create an image of an ISIS flag ("flag of tawheid") for CC-7 to associate with that channel.

II. On or about February 13, 2017, CC-7 posted a message in a channel on the Messaging Application in which the Minor was participating. In the message, CC-7 included a link to a video titled "ISIS - Eye for Eye." A screenshot of that video appeared in the message, which depicted three hooded men armed with what look to be Kalashnikov assault rifles.

III. On or about February 18, 2017, CC-7 posted a message in a channel on the Messaging Application in which the Minor was participating. CC-7 posted a link to a channel on the Messaging Application which CC-7 described as "special[izing] in cinematic Khilafah videos made in [the style of a popular video game (the "Video Game").]" CC-7 then posted another message, stating, "Back after our previous channel was deleted[.]" Finally, CC-7 posted a message in which CC-7 wrote, "#Photo Report[,] #IslamicState[,] #Caravan_of_Martyrs[.]" In this series of messages, I believe that CC-7 was informing the other participants in the channel that CC-7 had created a new channel on the Messaging Application for the purpose of creating pro-ISIS videos in the style of the Video Game.

17. Based on my training and experience, my participation in this investigation and others, my conversations with other law enforcement agents and others, and my review of reports and other documents, I have learned, among other things, the following:

a. The Norwegian Media contains screenshots (the "Screenshots") of communications between the Minor, who was using the Minor Messaging Application Account, KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, using a Messaging Application account with the moniker "SyxxZMC" (the "SyxxZMC Account"), and CC-4, who was using the CC-4 Messaging Account.

b. The Screenshots show, among other things, the following:

i. During one exchange,[6] VO wrote, "lol dude you look normal as hell . . . I wouldn't expect you to support dawlah." The Minor responded, "But here I am xD." VO then sent the Minor the Vo Instagram Photograph, which, as

[6] The date of this exchange does not appear in the screenshot. Based on training and experience, my participation in this investigation and others, my conversations with other law enforcement agents and others, my review of, among other things, reports prepared by the UC, and the context of these messages, I believe that this exchange occurred between in or about January 2017 and February 2017.

described below, was posted on an Instagram account that VO told the UC that she used, see supra ¶ 15(c).[7]

ii. On or about January 26, 2017, the Minor sent a greeting to CC-4.

iii. On or about February 5, 2017, the Minor, VO, and CC-4 exchanged a series of messages, including:

I. VO wrote, "You can join the media division in UCC and the hacking side." The Minor replied, ":o really? Jazakallahu khayraann."[8]

II. The Minor wrote, "Would it be possible that [CC-7] could join the media wing?" VO responded, "Yes. Welcome to all my brothers . . . Did [CC-4] message you yet?"

III. The Minor responded by sending VO an image of the January 26 greeting that the Minor had sent to CC-4, see supra ¶ 17(b)(ii). VO responded, "Oh law[]" The Minor then asked, "Did he directly message me or secret chat?" VO answered, "I'll do a group chat."

IV. VO then began a group chat between VO, the Minor, and CC-4. VO wrote, "Ok . . . we here niggas." CC-4 responded, "UCC HOOD AGAIN OR WHAT." VO responded, "Yeah we hood niggas . . . in UCC . . . Yeah boss." VO went on to write, "You did very good." CC-4 responded "SO WHAT CAN HE MAKE FOR US??" VO then wrote, "Well dude tell [CC-4] what you're able to do." CC-4 replied, "Ma brother make some things for UCC #Demolishing_Fences I WAIT TO SEE . . . ."

18. Based on my training and experience, my participation in this investigation and others, my conversations with other law enforcement agents and others, and my review of

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[7] As noted above, during the Interviews, VO acknowledged that she had recruited a minor in Norway to provide services for the UCC. See supra ¶¶ 13(k)-(l).

[8] Based on my training and experience, my participation in this investigation, and my conversations with other law enforcement agents, I have learned that "Jazakallahu khayraann" appears to be a transliteration of the Arabic phrase Jazāk Allāhu Khayran, which is typically used as an expression of gratitude.

reports prepared by the UC, I have learned, among other things, the following:

a. On or about March 23, 2017, the UC communicated with the Facebook profile "Sage Pi" (the "Sage Pi Facebook Account") through Facebook's private messaging function. In connection with that exchange, the UC also took a screenshot of the profile page for the Sage Pi Facebook Account, which bears an image (the "Sage Pi Photograph"). I have compared the Sage Pi Photograph to the Vo Instagram Photograph and the video recordings of the Interviews, and they all appear to depict the same person.

b. During this conversation, KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and the UC exchanged the following communications, among others:

i. VO wrote "It's me . . . . F..@NnnnnnG."

ii. VO stated that she had "heard the news of [CC-4]." After the UC responded that CC-4 had been martyred, VO asked, "So who confirmed he had been shaheed?" "Shaheed" is a term used by ISIS supporters, among others, to refer to those who are killed on behalf of ISIS.

iii. VO then asked the UC if the UC had heard that CC-3 had been executed by foreign authorities. When the UC responded that the UC did not believe that CC-3 had been executed yet, VO asked the UC if the UC could help disseminate the following message before CC-3 was executed:

> In the name of Allah, who is the most gracious and merciful.
>
> A very important reminder for all of our beloved brothers and sisters. Do not be sad and plunge yourselves into sorrow. [CC-4], Junaid Hussein, [CC-6], and [CC-3] have won victory over the enemies who drill in the path of the righteousness. The brothers have fought among the tyrant leaders of the world with their courageousness; one that allows himself to face all obstacles and danger in front. The Islamic state cyber division has not lost. Drone us as much you can infidels! By the next morning you will find another kind of us ready to wage war of Jihad! This isn't something new to us. We

> pledge to Abu Bakr Al-Baghdadi the Islamic state will expand in regions across the seven seas. O'you infidels do not think this is the end. There will be blood today, tomorrow and until your last breath.

iv. At a later point in the conversation, VO and the UC discussed the "UK shooting," which had been accomplished by a "shaheed" (martyr). VO stated "Hey this gives me an idea use this recent success attack as a good example for the Iraqi campaign and target more countries . . . . This is a valid opening for us if we do a message." On or about March 22, 2017 (the day before this online exchange), a terrorist executed an attack outside the British Parliament building in London, the United Kingdom. The attacker drove a car onto a sidewalk, injuring 50 people and killing four. After the car crashed, the attacker ran toward another building and fatally stabbed a police officer. British authorities then shot the attacker. I believe that this was the attack that VO meant when she referenced the "UK shooting."

v. Later, VO asked the UC whether a video the UC had shared with VO had been prepared by "brother abu." After the UC asked whether VO meant the user of the Minor Screen Name when she said "brother abu," VO asked for a screenshot of the profile page for the individual the UC was referring to and stated that the person she knew "was European and he was new to ucc he makes [a common acronym for the Video Game] videos like animated characters of remakes of video releases . . . of dawlah." VO later described "Brother Abu" as being 14 years' old. As noted above, the Minor was Norwegian and, with CC-7, created propaganda videos for ISIS styled after the Video Game. See supra ¶ 16(e).

vi. VO further stated that she had told the Minor to send her videos that the Minor had prepared and that she had introduced the Minor to CC-4.

The Minor and CC-7 Create an Online Video Threatening a New York Non-Profit Organization on Behalf of the UCC

19. Based on my participation in this investigation, conversations with other participants in the investigation, review of evidence obtained during the investigation, and review of reports prepared by others and electronic communications, I have learned, among other things, the following:

a. A certain non-governmental, not-for-profit organization based in Manhattan ("Victim-1") was formed to find and combat the online promotion of extremist ideologies. Among other things, Victim-1's employees purportedly monitor social media sites for the presence of extremist online actors who disseminate pro-ISIS messages and teachings.

b. In addition, Victim-1's employees enter pro-ISIS channels and chatrooms. Victim-1's workers then use Victim-1's own social media accounts, including its Twitter account (the "Victim-1 Twitter Account"), purportedly to expose and counter extremist propaganda found on pro-ISIS social media pages and within pro-ISIS chatrooms.

20. Based on my participation in this investigation, conversations with other participants in the investigation, review of evidence obtained during the investigation, and review of reports prepared by others, I have learned, among other things, the following:

a. On or about February 4, 2017, one of Victim-1's employees (the "Employee") entered an open pro-ISIS channel ("Messaging Channel-1") hosted by the Messaging Application and administered by the Minor. On that date, the Minor posted in Messaging Channel-1, among other things, that the Minor and CC-7's "mission" was to "recreate official Islamic state videos" and that to counter the efforts of groups like Victim-1, the participants in Messaging Channel-1 should "[l]earn how to infiltrate systems, track them down via IP. And send their address to dawlah people in their lands."[9]

b. On or about February 6, 2017 (the day after KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, had agreed with the Minor and CC-4 that the Minor could work on behalf of the UCC, see supra ¶ 17(b)(iii)), the Employee entered Messaging Channel-1 and later re-posted on the Victim-1 Twitter

[9] Based on my training and experience, my participation in this investigation, my conversations with other law enforcement agents and others, and my review of reports prepared by others and relevant information made publicly available, I believe that "IP" is a reference to an Internet Protocol address, which is a unique string of numbers that identifies a location for an electronic device connected to a computer network. In many cases, an IP address can identify the location from which such device is accessing the Internet.

Account a portion of the conversation that took place within Messaging Channel-1 (the "Twitter Post").

c. Shortly after the Employee posted the Twitter Post, a user of Messaging Channel-1 ("CC-8") copied a screenshot of the Twitter Post into Messaging Channel-1. CC-8 wrote, "Admin: someone in here is a rat. I saw this screenshot of this group on Twitter from TODAY from a group called [Victim-1]. They are US government spies." The Minor replied, "I guess I am famous now. . . .[,]" to which CC-8 responded: "Since they are probably reading this, we should send them a message." The Minor replied, "Ohoho, the media wing in the UCC will send a message."

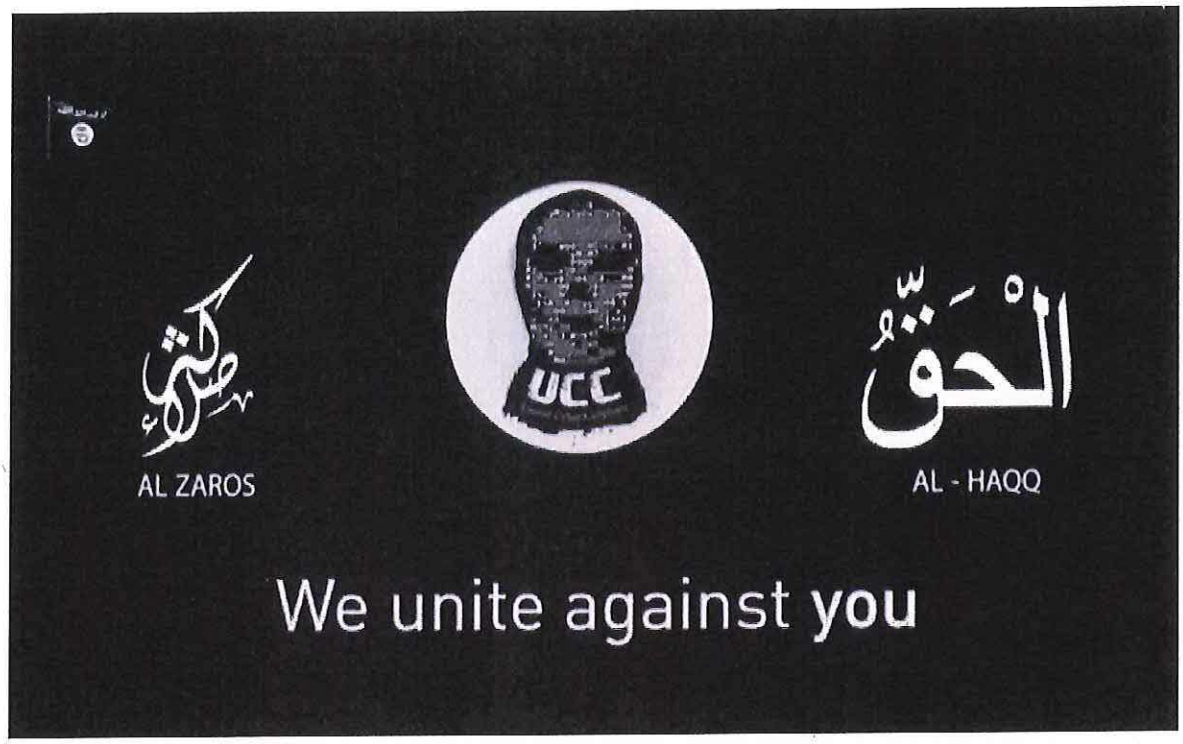
d. On or about February 8, 2017, the Minor wrote in Messaging Channel-1, "May this message be for every media that tries to spy on us, or gather information. We will find you InshAlla, and already 4 people that has been working for such media's has gotten their information leaked." The Minor then posted a video (the "Victim-1 Video") in Messaging Channel-1.

e. On or about March 3, 2017, the UC saw CC-4 post a link to the Victim-1 Video in an UCC-affiliated channel hosted by the Messaging Application.

f. After the Victim-1 Video was posted in channels hosted by the Messaging Application, individuals publicly disseminated it online by, among other things, individuals linking to the video in tweets posted through Twitter.

21. Based on my review of the Victim-1 Video, I have learned, among other things, the following as described below or depicted in the images herein:

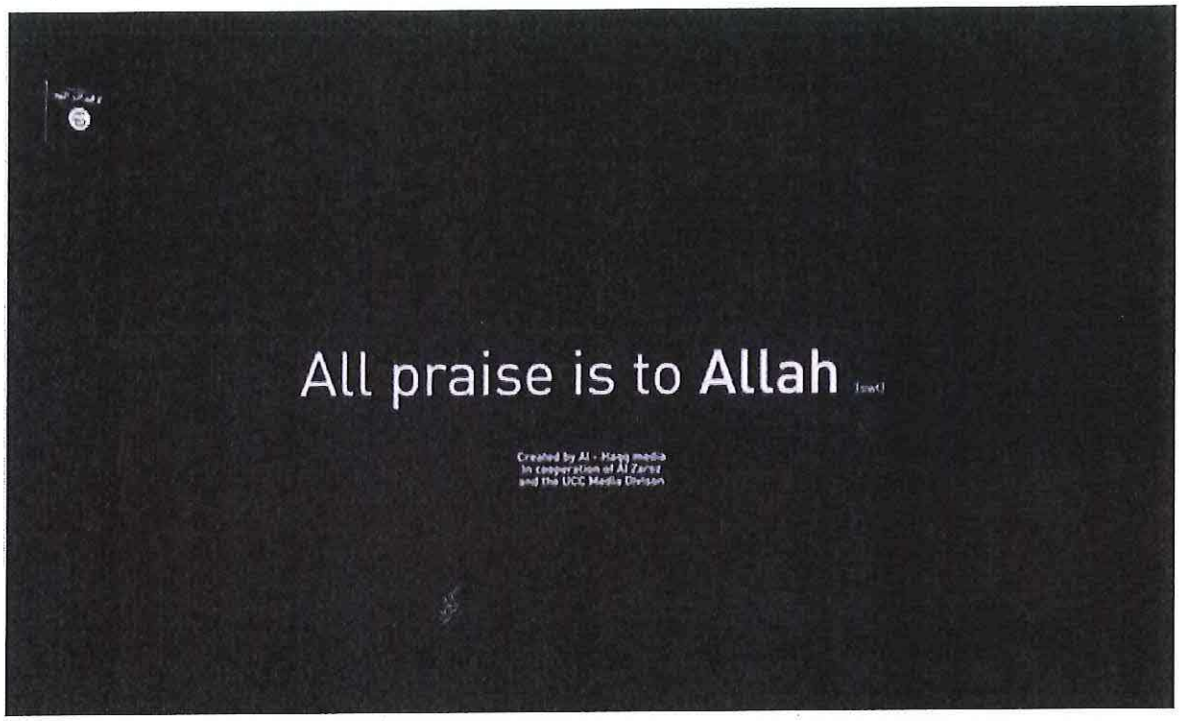
a. The Victim-1 Video is approximately one minute long. It begins with a message that displays the Victim-1's logo and states: "This message is directed at you . . . You have been spying on us." It then displays the Twitter Post. Next, the words "So now . . . We unite against you" appear, along with the logo for the UCC, among others.



b. The next scene in the Victim-1 Video includes the words "You messed with the Islamic State SO EXPECT US SOON."

c. The next scene displays a photograph of Victim-1's chief executive officer and a former U.S. Ambassador ("Victim-1 CEO"), along with the words: "[Victim-1 CEO] we will get you, and take [the Victim-1 Twitter Account] down Inshallah." Next to the words is a photograph of Victim-1 CEO that appears to have been taken from Victim-1's website. Behind the words there is video of a man who appears to be shackled with his throat slit and bleeding. The ISIS standard black flag appears in the upper left hand corner of the screen.

d. The Victim-1 Video closes with the message "All praise is to Allah."



The Hack and April 2, 2017 Kill List Video

22. Based on my participation in the investigation, my conversations with other law enforcement agents and others, and my review of reports prepared by other law enforcement agents and others, including the UC, I have learned, among other things, the following:

a. On or about March 21, 2017, CC-4 directed the other participants in a chat on the Messaging Application, which included CC-7, to advise members of the UCC to be prepared to disseminate UCC propaganda through various communication methods and social media platforms. CC-4 indicated that the UCC

would soon post a "kill list" of Americans to begin the next phase of the UCC's campaign.

b. On or about April 2, 2017, CC-4 (using a different moniker)[10] stated that CC-4 was working on a new "kill list" and uploaded three videos with the same filename and a spreadsheet containing names of individuals, including thousands of U.S. residents (the "Kill List Spreadsheet"). CC-4 tasked CC-7 with uploading the video.

c. Later that day, CC-7 posted a video (the "Kill List Video"), along with the hashtags "#UCC," "#United Cyber Caliphate," and "#Kill List." CC-7 also posted the video through three YouTube links (the "Links") CC-7 created.

23. Based on my training and experience, my participation in the investigation, my conversations with other law enforcement agents and others, and my accessing of the Links, I have learned, among other things, that:

a. The Links were publicly available and accessible by anyone who simply clicked the Links or entered the address into an Internet browser.

b. Accessing each of the Links took the user to a YouTube website where the Kill List Video was available.

c. The Links were created on or about April 2, 2017.

24. Based on my training and experience, my participation in this investigation and others, my conversations with other law enforcement agents and others, and my review of reports prepared by others and the Kill List Video, I have learned, among other things, the following:

a. The video opens with a black screen. Next, the following image appears:

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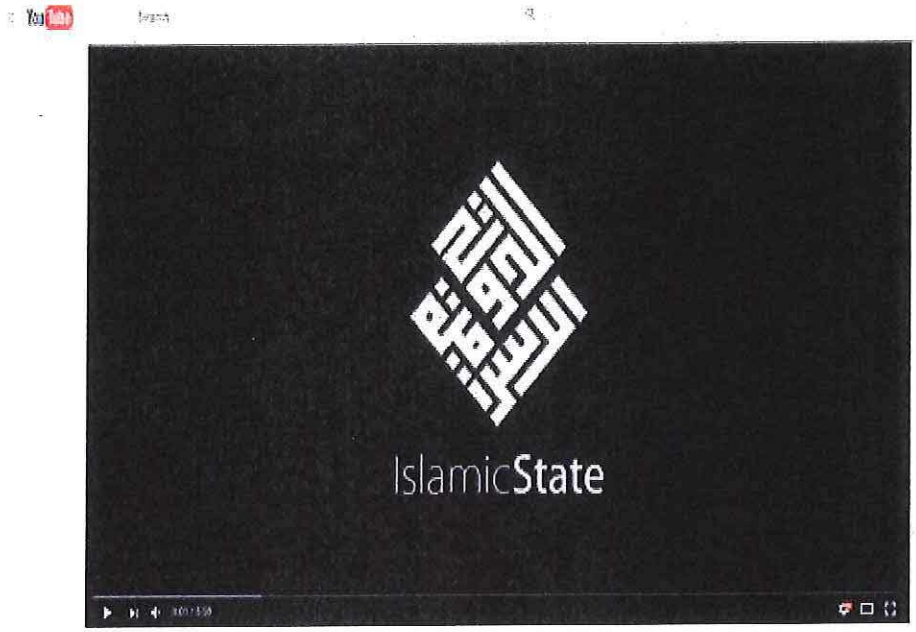
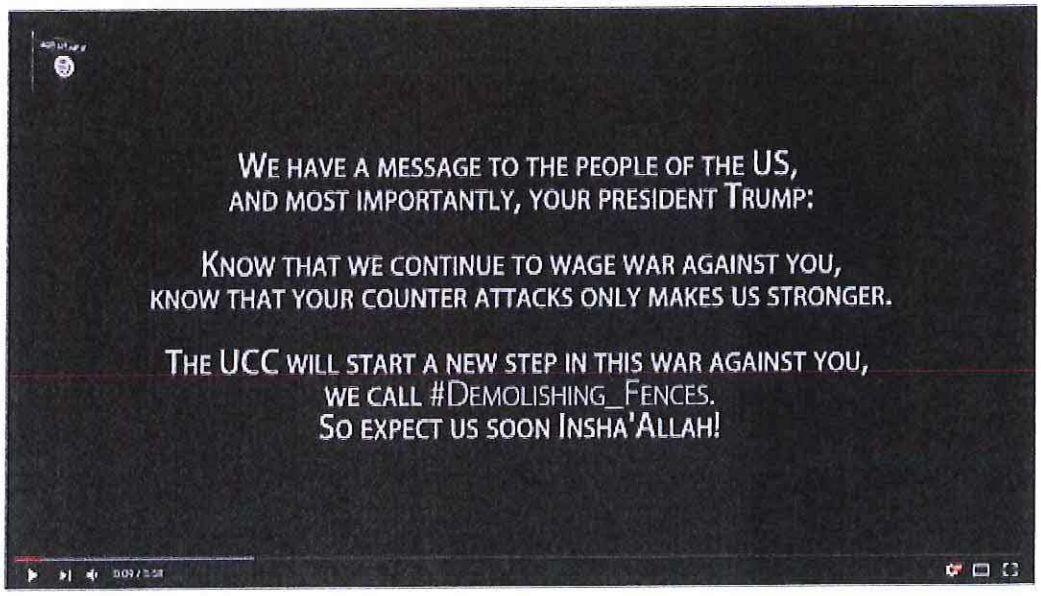
[10] Based on my training and experience, my participation in this investigation, my conversations with other law enforcement agents and others, and my review of reports prepared by others, including the UC, I have learned that, prior to the communication described above in paragraph 22(b), CC-4 had identified this new screen name as belonging to CC-4 in an electronic communication involving CC-7.



#Demolishing Fences UCC

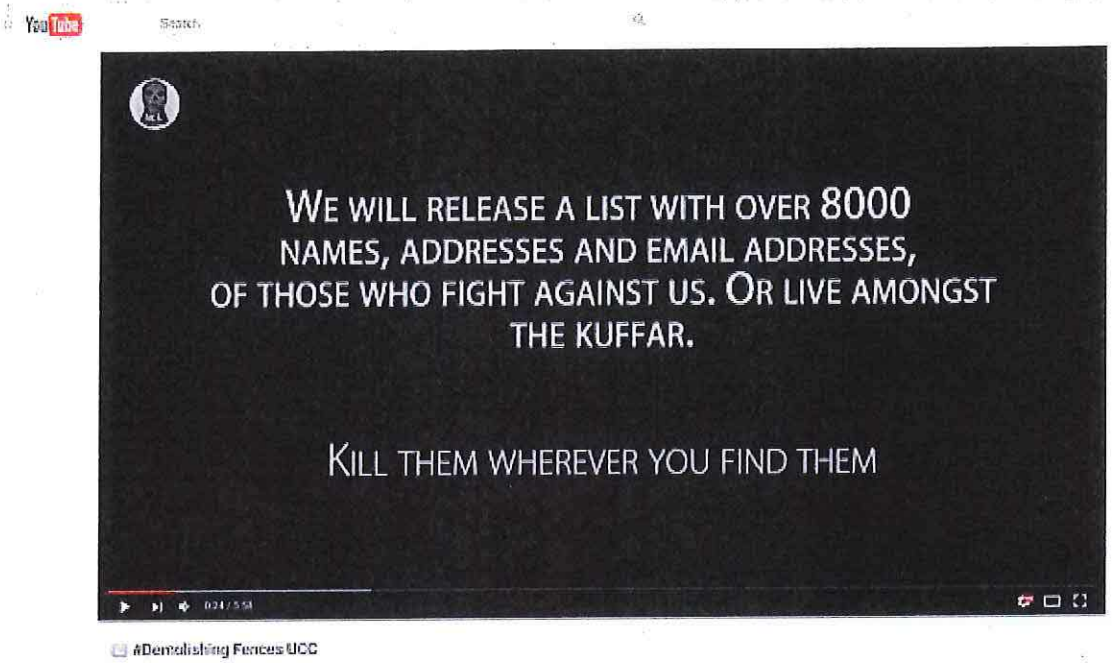
I know that the symbol above the words "Islamic State" (another name for ISIS) is used by ISIS.

b. In a later scene, the following message appears:



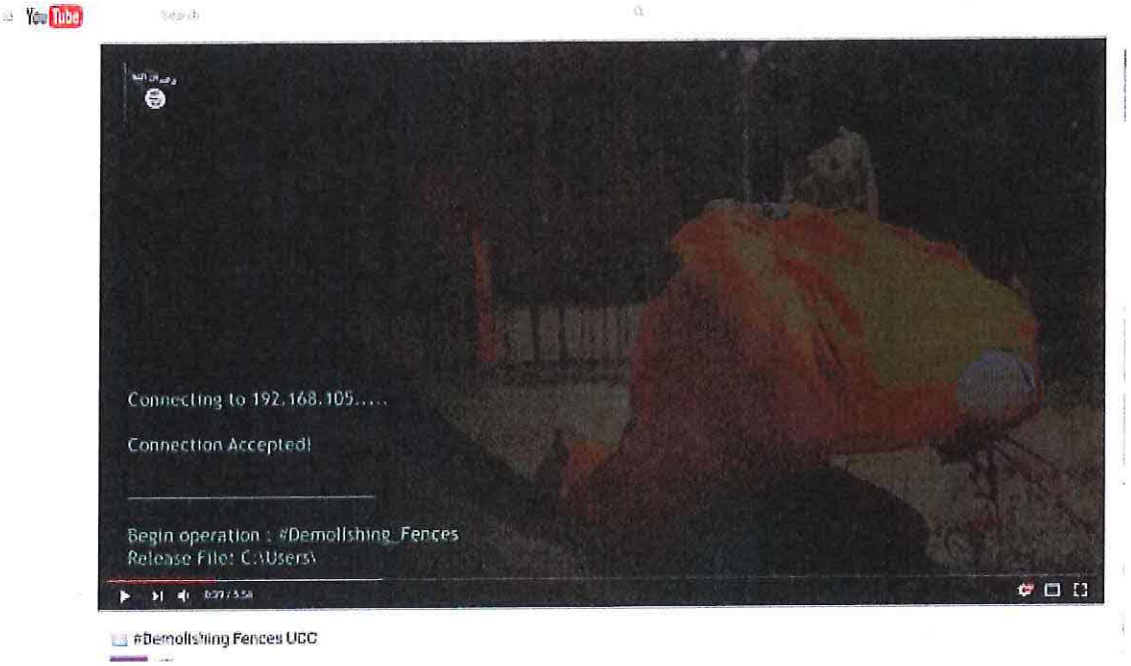
#Demolishing Fences UCC

c. The video also contains the following:



I believe that this message is a threat to release a "kill list" of "those who fight against us," i.e. ISIS or UCC, or "live amongst the kuffar," non-adherents to Islam.

d. In subsequent scenes, the video contains what appears to be a graphic depiction of the decapitation of a kneeling man:



e. Finally, the video also contains an excerpt of a "kill list," which includes many individuals who appear to live in the United States, including in this District.

25. Based on my training, experience and participation in this investigation, my conversations with other law enforcement agents and others, and my review of, among other things, the Kill List Spreadsheet, the Kill List Video, materials from the Dutch Media, and forensic evidence obtained by the FBI, I have learned, among other things, the following:

a. The Kill List Spreadsheet contained what appeared to be approximately 8,787 lines of data.

b. The data is organized in columns that appeared to contain personal identifying information, such as first and last names, addresses, and email addresses.

c. Thousands of the individuals identified in the Kill List Spreadsheet are listed as having addresses in the United States.

d. The names that were depicted in the portion of the Kill List Video described above in paragraph 24(e) also appear - in the same format - in the Kill List Spreadsheet.

e. Using metadata for the Kill List Spreadsheet, the FBI was able to determine the personal identifying information reflected in the Kill List Spreadsheet was derived from an illicitly accessed electronic file (the "File") that was contained in the website of a U.S. business (the "U.S. Business") and which recorded personal information about the U.S. Business's customers.[11] CC-4 illegally accessed the File, stole this information, and supplied it in the form of the Kill List Spreadsheet to CC-7, who created the Kill List Video using that information and then disseminated the video.

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[11] Based on my training and experience, my participation in this investigation, my conversations with other law enforcement agents and others, and my review of reports prepared by others and relevant information made publicly available, metadata is colloquially referred to as data about data and includes information about electronic file properties or characteristics, such as file format, size, page layout, and other properties that allow the data or file to be accessed by a device as well as authentication of information such as the data creator and creation date.

WHEREFORE, deponent prays that a warrant be issued for the arrest of KIM ANH VO, a/k/a "F@ng," a/k/a "SyxxZMC," a/k/a "Zozo," a/k/a "Miss.Bones," a/k/a "Sage Pi," a/k/a "Kitty Lee," the defendant, and that she be arrested and imprisoned, or bailed, as the case may be.

GEORGE MURPHY
Special Agent
Federal Bureau of Investigation

Sworn to before me this
8th day of March, 2019

HONORABLE DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK