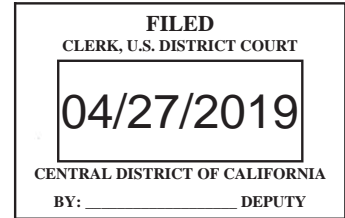


UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America,

Plaintiff

v.

Mark Domingo,

Defendant

Case No. 2:19-MJ-01751-DUTY

CRIMINAL COMPLAINT

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

Beginning on an unknown date and continuing until April 26, 2019, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 2339A

Offense Description

Providing and Attempting to Provide Material Support to Terrorists

This criminal complaint is based on these facts:

Please see attached affidavit.

[X] Continued on the attached sheet.

Complainant's signature

Tasha Coolidge, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/27/19

Judge's signature

City and state: Los Angeles, California

Hon. Michael R. Wilner, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Tasha Coolidge, being duly sworn, declare and state as follows:

**I. INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since March 2018. I am currently assigned to the Joint Terrorism Task Force ("JTTF") of the Los Angeles Field Division. Before becoming a Special Agent, I was on active duty in the United States Air Force Security Forces, serving eight years overseas, with an overall mission to deter, detect and mitigate criminal and terrorist activity. During this time I had numerous responsibilities such as, protecting high-valued U.S. assets, dignitary support, anti-terrorism measures, and fly-away missions. In total, I have been sworn to protect and serve the United States for nearly ten years. During my career, I have gained a broad expertise covering weapon systems, law enforcement, operational terrorist cells, and counter-insurgency measures. Through the course of my training and employment with the FBI, I have used a variety of investigative techniques and resources, including, surveillance, confidential sources, search warrants, evidence seizures, and telephone toll analysis. I am familiar with strategy, tactics, methods, tradecraft, and techniques of criminals, terrorists, and their agents. During my employment with the FBI, I attended 21 weeks of New Agent Training at the FBI Academy in Quantico, Virginia. I have received both formal and informal training from the FBI

regarding criminal and counterterrorism investigations. I have also attended training concerning the use of electronic communications and computers in furtherance of crime.

## **II. PURPOSE OF THE AFFIDAVIT**

2. This affidavit is submitted in support of a criminal complaint charging defendant Mark Steven Domingo ("DOMINGO") with Providing and Attempting to Provide Material Support to Terrorists, in violation of Title 18, United States Code, 2339A (the "Subject Offense").<sup>1</sup>

## **III. SUMMARY OF PROBABLE CAUSE**

3. In March and April 2019, DOMINGO planned and took steps to manufacture and use a weapon of mass destruction in order to commit mass murder. On April 23 and 24, 2019, DOMINGO purchased several hundred nails to be used as shrapnel inside an explosive device, and provided the nails to a person whom DOMINGO believed to be a collaborator, but who was in fact an undercover law enforcement officer ("UC") working for the FBI, for the purpose of having the UC manufacture weapons of mass destruction for DOMINGO to use in an upcoming attack. As discussed below, on April 26, 2019, DOMINGO met the UC, inspected the items DOMINGO believed were weapons of mass destruction (but unbeknownst to him were actually inert), and finalized plans to commit the attack on Sunday April 28, 2019.

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<sup>1</sup> Title 18, United States Code, Section 2339A, makes it unlawful to provide or attempt to provide material support or resources, knowing or intending that they are to be used in preparation for, or in carrying out, a violation of certain specified offenses, including Title 18, United States Code, Section 2332a (Use of a Weapon of Mass Destruction).

**IV. STATEMENT OF PROBABLE CAUSE**

4. The facts set forth in this affidavit are based in part on: information provided to me by other law enforcement officers; law enforcement reports; information obtained from witnesses; my personal observations; and my experience, training, and background as an FBI Special Agent. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint, arrest warrant, and search warrants, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only with quoted language appearing in draft form only, and all dates and times are approximate.

**A. DOMINGO Posts About His Support for Violent Jihad and Committing a Large-Scale Terrorist Attack**

5. According to reports provided by an FBI online covert employee ("OCE"), in March 2019, the OCE identified a user of an online platform (hereinafter USERNAME 1) in a private message group. On March 2, 2019, USERNAME 1 posted a link to a video in which he introduced himself as "Mark Domingo," and declared the shahada.<sup>2</sup>

6. FBI Agents reviewed DOMINGO's California Department of Motor Vehicles records, and saw that the person in the video appeared to be DOMINGO. FBI Agents also reviewed records

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<sup>2</sup> Based on my training and experience, I am aware that the shahada is the profession of faith and the first tenet of Islam: "There is no god but Allah, and Muhammad is the messenger of Allah."

provided by the platform, which showed that the USERNAME 1 account was associated with email address m.domingo2014@hotmail.com, and telephone number 931-249-5283. According to records provided by Microsoft, the name associated with the m.domingo2014@hotmail.com e-mail address is "Mark Domingo."

7. According to Department of Defense records, DOMINGO was also previously an active duty U.S. Army Infantryman. He was assigned to Fort Campbell, Kentucky, and then deployed to Afghanistan from September 10, 2012 to January 16, 2013.

8. FBI agents have reviewed online posts provided by the OCE in which DOMINGO described his support for violent jihad and his aspiration to conduct an attack in the Los Angeles area.

a. On March 3, 2019, DOMINGO posted, "america needs another vegas event tbh<sup>3</sup> something to kick off civil unrest [ . . . ] and its not about winning the civil war its about weakening america giving them a taste of the terror they gladly spread all over the world." Based on my training and experience, I believe that DOMINGO's description of "another vegas event" is a reference to the October 1, 2017 mass shooting in Las Vegas, Nevada, which killed 59 people.

b. On March 14, 2019, DOMINGO posted, "there were mosque shootings in new Zealand [sad emoji] [ . . . ] there mustbe retribution." Based on my training and experience and

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<sup>3</sup> Based on my training and experience, I am aware that "tbh" is used in electronic communications as shorthand for "to be honest."

knowledge of this investigation, I believe DOMINGO was referring to the March 13, 2019 mass shootings at two mosques in Christchurch, New Zealand, which killed 50 people.

Also on March 14, 2019, DOMINGO posted, "I feel like I should make a christians life miserable tomorrow for our fallen bros n sis in new Zealand [. . .] maybe a jews life idk<sup>4</sup> [. . .] they shed our blood [. . .] no Muslim should have to experience this, a message needs to be sent."

**B. DOMINGO Expresses His Intent to Kill Americans to Retaliate for the Mass Shooting in New Zealand**

9. According to the OCE, on March 14, 2019, after observing DOMINGO's posts regarding retaliating for the New Zealand mass shooting, the OCE initiated a private online conversation with DOMINGO, in which they discussed their anger about that mass shooting. In those messages, DOMINGO wrote, "im jus enraged atm<sup>5</sup> [. . .] these fuckers do need to bleed [. . .] one way or another." The OCE cautioned DOMINGO that police would be ready the next day, and that any sort of retaliatory response would require planning. In discussing with the OCE how many people DOMINGO would like to kill in retaliation, DOMINGO wrote: "one [individual]? was thinking more like a group theres a bunch of jews around this one street not alot of parking so theyre forced to find parking and walk to the synagogue." Later

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<sup>4</sup> "Idk" is short for "I don't know."

<sup>5</sup> Based on my training and experience, I am aware that "atm" is short for "at the moment."

in the conversation, DOMINGO wrote that "the yahud<sup>6</sup> go on saturday for their worship," and that the area was upscale and had a lot of businesses and surveillance cameras.

10. On March 16, 2019, an FBI Confidential Human Source<sup>7</sup> ("CHS"), who also maintained an online account and was in the same private message group as DOMINGO and the OCE, sent a private message to DOMINGO asking how he was feeling. DOMINGO responded, "still mad [. . .] even more so [. . .] since I watched the vid." Based on my training and experience and knowledge of this investigation, I believe "the vid" was a reference to live footage of the New Zealand shootings, which the perpetrator streamed online during the attacks and which has subsequently been reposted on the Internet.

11. DOMINGO continued, "how my bros n sis died [. . .] i took my ak out [. . .] its been by my bed." Based on my training and experience, I know that "ak" is a common shorthand reference to a Kalashnikov-manufactured assault rifle, the most commonly known model of which is referred to as an AK-47. According to a law enforcement database, DOMINGO has three firearms registered to him: a Century Arms Wassenaar Arrangement semi-automatic rifle (WASR 10), which is an AK-47 style rifle; a Tulski-Korovin SKS semi-automatic rifle; and a Zastava M 48 bolt-action rifle.

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<sup>6</sup> Based on my training and experience, I am aware that Yahud is an Arabic word for Jews.

<sup>7</sup> The CHS has worked with the FBI since approximately August 2013. In total, the CHS has been paid approximately \$304,524. The CHS does not have a criminal history.

12. Later in their conversation, DOMINGO suggested that he and the CHS meet in person, and they agreed to meet the following week.

**C. DOMINGO Meets CHS on March 18, 2019 and Proposes Ideas for Committing a Terrorist Attack**

13. On the evening of March 18, 2019, the CHS and DOMINGO met in person to eat dinner and attend a prayer service. The meeting was audio recorded. During that meeting, as detailed below, DOMINGO discussed with the CHS different targets for an attack, including Jews, police officers, churches, and a military facility.

14. DOMINGO and the CHS discussed the wars in Iraq and Syria, and the activities of Al-Qa'ida and the Islamic State of Iraq and al-Sham ("ISIS"). After the CHS said Al-Qa'ida was "not doing anything," DOMINGO said, "Well, they'll, they'll plant IEDs." Based on my training and experience, I believe that "IEDs" is a reference to Improvised Explosive Devices. DOMINGO characterized Al-Qa'ida's tactics as "sort of hit and run [. . .] They'll shoot, then they'll run away [. . .] then the Americans get mad. Then they go murder Muslims [. . .] This is why I like - I like al-Baghdadi, yeah, 'cuz he took the direct stance [. . .] victory or martyrdom."<sup>8</sup> Based on my training and experience, I believe "al-Baghdadi" was a reference to Abu Bakr al-Baghdadi, the leader of ISIS.

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<sup>8</sup> Based on my training and experience, I know that among violent Islamic extremists, the term martyr means one who dies for Islam through violent jihad.



15. Throughout their drive, DOMINGO pointed out possible targets to the CHS, including police cars, churches, and a National Guard Armory. At one point, DOMINGO stated "This is the business street [. . .] the Yahud come here on Saturday. They're all up and down the street, but there's cameras everywhere. I mean it's a business you know." The CHS said, "if you really want to do it, you can't just, you can't just go online and do it, you know? You're going to end up like-" DOMINGO interrupted the CHS and said, "A martyr." The CHS replied, "No. They going to put you in jail." DOMINGO replied, "If they catch me alive." The CHS replied, "okay, you going to go shahid?<sup>9</sup> You going to kill one or two? What's the plan? You tell me [. . .] You have a plan?" DOMINGO replied, "something has to be done."

16. Moments later, DOMINGO said "I know what you're saying. We should plan." The CHS replied "I mean I don't want to get caught. Your plan is just to go and get caught. That's your plan." DOMINGO replied "Martyrdom, bro." The CHS said, "It's better not to get caught." DOMINGO said "Better not to be taken alive. But [. . .] I have many magazines." DOMINGO said he had nine "AK magazines," five of which were loaded, and described to the CHS the guns that he owned. After DOMINGO said "They're all legally under my name," the CHS said "That's not going to work. We're going to get caught." The CHS said, "No [. . .] Well to be fair, yeah. [. . .] Okay. So we plan [. . .

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<sup>9</sup> Based on my training and experience and the totality the facts, "go shahid" is used here to mean "become a martyr."

.] We plan. We take our time. You know we just, we cruise. We chill. We chill for a bit."

17. During the meeting, DOMINGO pointed out a church and said "there's another one [. . .] I mean this is the land of kuffar,<sup>10</sup> brother." The CHS said "You want to go after church? What do you want to hit? Churches or like the military base? Which one do you want to show me?" DOMINGO replied "We can always hit the cops." The CHS again expressed concern about DOMINGO conducting an attack using guns registered in his own name, and asked if the bullets were also registered in his name. DOMINGO said the bullets were not registered, and he used gloves to handle the bullets so his fingerprints would not appear on them.

18. The CHS then said that he knew someone who "used to make IEDs." DOMINGO replied "That's even better." The CHS described how an IED could be placed under a car and detonated with a timer. The CHS and DOMINGO then arrived at the mosque and went inside for several minutes to pray. When they left the mosque, the CHS said the CHS would talk to "the brother, and see." DOMINGO replied "He can make IEDs?" The CHS replied that the brother could not make IEDs, but the CHS would see if the brother knew someone else who could. The CHS drove DOMINGO back to DOMINGO's house, and DOMINGO said, "We'll keep in touch [. . .] You have my number. I have yours."

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<sup>10</sup> Kuffar is the plural form of an Arabic word referring to non-believers or infidels, likely used by DOMINGO to refer to non-Muslims.

**D. DOMINGO Proposes Conducting a Drive-By Shooting**

19. On March 20, 2019, DOMINGO sent the CHS a private message of a photograph of an AK-style rifle alongside a piece of paper with a handwritten caption, "USERNAME 1 [. . .] 3/20/2019." The rifle depicted in the photograph appeared to feature a foldable metal stock, an attached sling, and a detachable high-capacity ammunition magazine that DOMINGO keeps at his house. DOMINGO explained to the CHS that the rifle had a "foldable stock for drive by" and that he "took off wooden stock [. . .] replaced it with wire [. . .] cuz wire can fold." Based on my training and experience and knowledge of this investigation, I believe DOMINGO's reference to replacing the rifle's wooden stock with wire for a "drive by" means that DOMINGO modified his rifle so that it could be handled and fired more easily from inside a vehicle.

20. Later that day, DOMINGO sent a message to the OCE containing a similar photograph of his rifle. DOMINGO asked the OCE to send a timestamped photograph in return and stated "like what I did with my ak [. . .] i time stamped it [. . .] so u know its mine [. . .] and i aint fed [. . .] (cuz my ak configuration is illegal af<sup>11</sup>) lol." DOMINGO said he thought there may be a "snitch" in the message group. When the OCE assured DOMINGO that everyone had to be invited, DOMINGO responded, "inshallah [. . .] tho if I do, do anything that is [. . .] go dark [. . .] for a bit [. . .] and I'll see you up

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<sup>11</sup> AF is slang for "as fuck," meaning very.

there [. . .] if allah wills lol."<sup>12</sup> Based on my training and experience, I believe "up there" is a reference to paradise, or heaven, and DOMINGO expects to earn his place in paradise by dying through violent jihad.

**E. DOMINGO Meets with the CHS on March 22, 2019 and Discusses His Intent to Commit a Terrorist Attack**

21. On the evening of March 22, 2019, the CHS and DOMINGO met again to eat dinner and attend a prayer service. The meeting was audio recorded. During that meeting, as detailed below, DOMINGO discussed with the CHS different plans for committing an attack.

22. DOMINGO asked the CHS if the CHS saw his "AK," apparently referencing the photograph DOMINGO had sent the CHS of his rifle. DOMINGO spoke about some modifications he made to the rifle and added "So when we decide to act or when I decide to act, I can keep it, like, you know when it's the wood, it's gonna be like, you know, it's gonna be uncomfortable [. . .] in the car [. . .] With the wire, you can fold it."

23. The CHS replied that DOMINGO had just converted to Islam and was "so pure," and stated "You don't need to, like you don't have to do this. You know that, right? You're pure." DOMINGO responded by pointing out a police car, stating "That's the police," and describing how police cars have bullet proof glass but police officers "roll their window down sometimes."

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<sup>12</sup> "Lol" is short-hand for "laugh out loud." DOMINGO also stated he had to "show off," but added, "martyrdom to me is like [heart-eye emojis]." DOMINGO later stated he was just a believer who was "mad atm." Again, "atm" means "at the moment."

24. DOMINGO and the CHS then discussed practicing Islamic prayers, and the CHS again said how DOMINGO was "pure." DOMINGO replied "To be fair though, most people here are shit [. . .] Everyone I know are like, they're like fake, you know [. . .] I always said that's fine, I'm just like, fuck 'em. I don't care about them. They don't care about me. They don't care about the deen."<sup>13</sup> The CHS replied that Allah would reward DOMINGO for being patient, and DOMINGO replied "But you know [. . .] A lot of the times, it's a fucking these Kuffar that start the beef, right?" The CHS said, "Yeah, they do, yeah." DOMINGO replied, "So you know, if they start it, I'm gonna finish it. You know, one way or another I'm gonna finish it. Like we can handle it by fighting. We can handle it throwing bullets at each other, what you wanna do bro, like murder me, kill me, I'll die Shahid."

**F. DOMINGO Speaks with the CHS on March 27, 2019 to Discuss His Plans to Conduct a Terrorist Attack**

25. On March 27, 2019, DOMINGO called the CHS via the platform to tell the CHS that he was upset with his neighbor and wanted to kill him. DOMINGO identified the neighbor as an enemy of the "Ummah"<sup>14</sup> and said that his blood was "halal."<sup>15</sup> The CHS

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<sup>13</sup> Based on my training and experience, I understand that the term the deen is an Arabic word referring to one's faith or religion.

<sup>14</sup> Based on my training and experience, I understand that Ummah is an Arabic word referring the worldwide nation or community of Muslims.

<sup>15</sup> Based on my training and experience, I am aware that the term "halal" is an Arabic word meaning religiously permissible. DOMINGO also made reference to a personal dispute with the neighbor involving trash on DOMINGO's lawn.

repeatedly tried to calm DOMINGO down. DOMINGO said that they were in the "heart of the enemy" and that if "martyrdom is just around the corner," there is nothing DOMINGO can do.

26. DOMINGO said he could stage the attack like a burglary, and that murders go unsolved all the time. DOMINGO said they needed to "start small," before building up to an attack of a larger scale, because they were bound to "fuck up" the first time. DOMINGO said if he killed his neighbor, it would test the response time of the police, and that the response time would likely be slower than at a National Guard Base.

**G. DOMINGO Meets With the CHS on April 3, 2019 and Proposes Using IEDs and Firearms to Attack Police Officers and Military Service Members in Los Angeles**

27. On the evening of April 3, 2019, the CHS and DOMINGO met in person. The meeting was audio and video recorded. During that meeting, as detailed below, DOMINGO reaffirmed his intent to commit a large-scale attack in the Los Angeles area, and described using firearms and IEDs to do so.

28. DOMINGO told the CHS that he was jealous of a person they both spoke to on the platform who had more guns than he. The CHS said the person "was talking about like IEDs and stuff," and DOMINGO told that person, "an IED here, on the freeway? That would do damage. [. . .] An IED, like the ones in Iraq [. . .] blows up on the freeway, hundreds and maybe thousands of US citizens injured." When the CHS asked "And then what?" DOMINGO said "Then the fun starts."

29. DOMINGO stated he wanted to "make 'em bleed, like in Ramadi" and "Fallujah." DOMINGO said, "a dead police that will get, like, that will get like the police riled up. But I need you bro, just the one IED that's going to stir up the hornet's nest, bro."

30. DOMINGO reiterated his intent to conduct an attack for "our brothers in Christchurch and our sisters who were slaughtered." DOMINGO also said he was "not afraid to die a martyr."

31. DOMINGO said his plan was to "go in fast" and "raid," rather than engage in a battle and try to "hold positions." DOMINGO said he intended to "kill enemies here and there, then we flee," similar to the "insurgency" in Iraq. DOMINGO said if they caused "small casualties here and there," that would "put the stress" on America and lead to martial law.

32. DOMINGO said that although such a hit-and-run strategy was more like the tactics used by "Zawahiri,"<sup>16</sup> and he would prefer to operate like "al-Baghdadi" and fight a "battle," that was not feasible because he and the CHS did not have enough manpower to succeed in such a battle. DOMINGO expressed support for ISIS and said if ISIS "came here," he would swear allegiance to ISIS.

33. The CHS said law enforcement in Europe had caught the Turkish man who had recently killed three people in the Netherlands. DOMINGO replied that he "had a feeling they were

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<sup>16</sup> Based on my training and experience, I believe "Zawahiri" is a reference to Ayman al-Zawahiri, the leader of Al-Qa'ida.

gonna catch him," and explained that the Netherlands is small and crowded, and "he probably didn't plan it right." The CHS said "you have to be patient." DOMINGO replied "Oh I know but you know, I want to do it." The CHS replied "Show me how you want to do, show me."

34. DOMINGO said "So what I'm thinking is, yea, we start small." DOMINGO then drew a diagram and explained multiple scenarios for how he could attack police officers. He then described a scenario in which he could attack LAPD officers. He also described another scenario, which he described as "really ballsy," in which he and the CHS would pull alongside a police car stopped at a red traffic light with its windows down and shoot into the car. DOMINGO said he had seen a police car with its windows down while he and the CHS were riding in the CHS's car in their first meeting, on March 18, 2019. DOMINGO later clarified that, in this scenario, he would want to get out of his car to "burn the vehicle, like dawla"<sup>17</sup> with "lighter fluid, oil, [or] gasoline," in order to destroy the cameras in the police car, causing a longer investigation and making "life a little more difficult." DOMINGO then stated "Inshallah, if that's all I can do to these kaffir, then wallahi, I'm down."

35. Later during the meeting, DOMINGO ripped up the diagram<sup>18</sup> he had drawn, and told the CHS they had "just talked

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<sup>17</sup> Based on my training and experience, I know that the term "dawla" is commonly used by violent extremists to refer to ISIS.

<sup>18</sup> The CHS later recovered the pieces of the diagram, and law enforcement was able to reassemble them.



about some serious shit," including "murdering police" and "murdering people." DOMINGO believed what he had just discussed with the CHS would result in "a lot of charges already" and warned that the CHS was in "deep shit." DOMINGO believed his discussion with the CHS could result in a "conspiracy charge" and told the CHS "We broke federal law." DOMINGO said "You can't expect to do these kind of things and remain anonymous forever [. . .] At some point, they're gonna know and you gotta be a man and you gotta stand your ground." When the CHS pointed out that they could get caught eventually, DOMINGO replied "Then we're gonna die shahid."

**H. DOMINGO Meets With the CHS on April 19, 2019 and Discusses Using IEDs and Firearms to Attack an Upcoming Rally**

36. On the evening of April 19, 2019, DOMINGO again met with the CHS. DOMINGO arrived wearing camouflage pants and holding a backpack containing an AK-47 style rifle partially covered by what appeared to be a shirt. Upon DOMINGO's arrival, the CHS expressed surprise that he had brought the rifle, and DOMINGO replied "If we're going to commit-- if we're going to commence fighting, jihad, yeah, fi sabilillah,<sup>19</sup> you gotta remain." The CHS said the CHS did not want DOMINGO to get caught carrying a gun, and DOMINGO replied that it was common in Los Angeles to carry a gun. Later in the night, the CHS remarked again that when DOMINGO arrived with the rifle, the CHS

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<sup>19</sup> Fi sabillillah is an Arabic term meaning "In the way of God/jihad in the way of God," or "for the sake of God," or "for the cause of God."

thought he was crazy, and DOMINGO replied "I just wanted to show you that I'm serious."

37. DOMINGO asked about homeless people (appearing to refer to individuals located outside the meeting location), and said "If you want, you know what I'm saying<sup>20</sup> [. . .] You're not ready, huh? You're not ready." The CHS said the CHS had been "really thinking about it" for the past two weeks and "wanted to see how serious" DOMINGO was. DOMINGO said he was serious, and added, "if you're not ready tonight, then okay." The CHS said "you want to do it tonight? Where?" DOMINGO said he did not know, and was tired, but that it was a "holy day for yahud" and for Christians, who were celebrating Passover and Easter. The CHS said, "so that's it? You wanna do it? You have, like, where?" DOMINGO said, "Anywhere." The CHS replied, "You're not serious. Are you serious?" DOMINGO replied, "I'm serious [. . .] sooner or later, this was gonna happen."

38. The CHS and DOMINGO then prayed and ate, after which DOMINGO said, "We don't have to do this. But we do this for our brothers and sister across the world, oppressed, yeah?"

39. During the meeting, the CHS said, "So you remember, like, IEDs?" DOMINGO said, "You want to?" The CHS said, "if you want to, I might know someone." DOMINGO replied "If you know someone, that's perfect [. . .] but does he know how to make it?" The CHS said he did. DOMINGO said "So he can write

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<sup>20</sup> Based on my training and experience and the totality of the facts, DOMINGO seemed to suggest an attack in the form of shooting homeless people.

down instructions on how to make it?" The CHS replied, "Probably." The CHS said the person was from Iraq. DOMINGO said "Okay, tell him this. Write down the instructions, clearly, and then wallahi. You can't buy these ingredients en masse, you know that [. . .] because that's more suspicious than buying guns." The CHS said "How then?" DOMINGO replied, "We'll buy it little by little [. . .] so it's not suspicious." The CHS said, "but where can you buy it from?" DOMINGO replied by naming three home improvement stores and said "They're everywhere. Here's the thing, the average person can make explosives." The CHS said, "they can?" DOMINGO said, "Yeah, it's easy. It's not easy, but it's not hard. If they put the time into it, everyone can make explosives. But obviously, wallahi, they don't want to. Because, you know, why would you? Only a terrorist would want to, right?"

40. During the meeting, DOMINGO said, "The IEDs would do more damage and would be better to transport [. . .] We'll both make it, I just don't know how. I'll be honest. I'm smart in history but I failed chemistry. Science is not my forte [. . .] So if that brother is willing to make it for us. . ." The CHS said, "Should I talk to him? What do you think?" DOMINGO replied, "Talk to him, if not make it. If he doesn't want to make it, don't force him. But ask him how. Details. [. . .] Fucking to the letter details. Ask him."

41. DOMINGO then asked, "Do you think he's a snitch? Do you think he'll tell the feds?" The CHS replied, "I can guarantee he's not going to." DOMINGO replied, "If he's not

gonna tell the feds, then you can talk to him." The CHS said, "but he's not gonna, like, have the same ideas." DOMINGO replied that was OK, and "if he doesn't want to take part, don't make him take part. But that is an avenue we shouldn't waste, and we should ask him, if you're not gonna help, can you at least teach me how?"

42. DOMINGO instructed the CHS to remind the associate what was happening to Muslims. DOMINGO stated "just remind him, you know, like, bro, al-Sunnah wal-Jummah is under attack. And I know you have a family and I'm not gonna force you." DOMINGO asked how the CHS knew the associate, and the CHS said they were at the same Mosque and the associate had been criticizing America. DOMINGO said, "does he hate kuffar?" The CHS said "He hates kuffar, but because he has a family, he doesn't want to get involved." DOMINGO replied "That's understandable [. . .] Talk to him some more [. . .] You can be casual about it. Have you ever made explosives? Like, haha, a joke. You can get bits and pieces."

43. DOMINGO also brought up an upcoming April 28, 2019 rally in Long Beach organized by a "white nationalist" group, and told the CHS it was going to take place at Bluff Park. The CHS asked, "So what's the plan?" DOMINGO said, "We'll have to scope out the area. We'll have to keep up everyday updates about the rally, because at any point they can cancel it." The CHS asked DOMINGO how he heard about the rally, and DOMINGO said he heard about it on the news and online. The CHS asked how DOMINGO wanted to carry out the attack, and DOMINGO said,

"Parking's gonna be an issue, We could do hit and run [. . .] We drive by, we empty a magazine or two. An AK. And we book it."

44. The CHS asked "but you said the IED will do more damage?" DOMINGO replied that "the IED will do more damage," and "we can make it before. It's coming up. We have two weeks [. . .] ask your brother. Ask the brother." The CHS said "so if we make it before, we can actually-[" DOMINGO interrupted and said "Detonate. Yes we can detonate it in a crowd. Which would be perfect."

45. DOMINGO then reiterated that he did not know how to make the IED himself, and said, "I need you to talk to him, and I need you to make sure he's not a snitch." DOMINGO instructed the CHS to "have him write it down, and then we'll see. We can make it. Even a small IED would do damage in a crowd. [. . .] The human body is very easy to break. A grenade can do a lot of damage, but a big IED just in a backpack, in a crowd? You're looking at least 20 people dead, maybe, maybe 30 people injured, so around 50 at least." The CHS said, "That's going to be the headline." DOMINGO replied, "I think if we do the IED route we are going to storm. Remember the Tsarnaev brothers, the Boston bombers, it stirred up a hornets nest [. . .] If we do this, LA is going to be locked down."

46. The CHS said "are you sure you want to do this, I am serious are you serious?" DOMINGO replied "I am serious, I want to do the IED route, which is somewhat the better idea. An IED will do a lot more damage crowd wise. We bring it and leave it

in the car. We each bring a different set of clothes [. . .] so we can escape [. . .] we can change in the car, be honest bro we possibly can change in the crowd. We can pretend we are injured and take off clothes and change. The best disguise is one in plain sight. So if the IED thing is sounding more serious and a better plan than going spraying and praying."

47. The CHS asked if they would be able to change into different clothes, and DOMINGO replied "Perhaps, we are going to leave the IED in a crowded spot." The CHS asked "what if we have an IED and they cancel?" DOMINGO replied "OK now we have an IED that we can use at our disposal."

**I. DOMINGO Purchases and Supplies Materials to Create and Use a Weapon of Mass Destruction**

48. On April 22, 2019, the CHS wrote in a private message to DOMINGO "I talk to the brother and he said he's willing to help us but we have to get him the stuff tonight And he's going to come tomorrow to pick it up." DOMINGO asked if the CHS could "get it all," and the CHS said no, they should split up purchasing different parts of the IED so they could avoid detection. The CHS said "I will buy some and you will buy some [. . .] So your part is: Christmas lights but no LEDs And shrapn[el] We have to buy the part tonight because he's going to come tomorrow to pick it up so he can build it And I will buy the pressure cooker and a remote control." DOMINGO asked "what about nails?" The CHS said "Like nails or [screw] driver whatever goes inside."

49. Shortly thereafter, law enforcement officers observed DOMINGO drive to multiple home improvement stores. At one store officers saw DOMINGO purchase several large boxes of nails from a self-service kiosk using a debit card. Agents later obtained closed-circuit television video and transaction records from the store, which showed that DOMINGO purchased approximately eight pounds of three-and-a-half-inch and longer nails using his debit card.

50. Later that day, DOMINGO wrote the CHS again and asked "u wanna try n pick up what I buy today or tomorrow." The CHS said "Maybe today because we have to give it to him tomorrow." DOMINGO replied "got nails lookin for lghts." The CHS said the CHS would look for the lights the next day, and DOMINGO replied "I can reimburse you tomorrow."

51. On the evening of April 23, 2019, DOMINGO again met with the CHS. The meeting was audio and video recorded. DOMINGO walked in with a bag containing the boxes of nails he had purchased the day before. DOMINGO examined boxes of remote control race cars that the CHS had obtained and placed on the table.

52. The CHS told DOMINGO that they "don't have to do this." DOMINGO said that the event in Long Beach may be cancelled, and proposed attacking a different "White Nationalist" rally in Huntington Beach, California, on Saturday, April 27, 2019. DOMINGO said the Huntington Beach rally would be on the beach, which may make it more difficult to kill as many people because it was a wide open space. DOMINGO said the

Santa Monica Pier would provide a better space for an attack, particularly during the summer when it was crowded, because it was a more enclosed space and people would not be able to escape from a blast. DOMINGO said that detonating an IED with a timer on the Santa Monica Pier would cause a lot of casualties.

53. DOMINGO confirmed that he had bought three-inch nails to provide to the UC to use in making IEDs. DOMINGO said he specifically bought three-inch nails because they would be long enough to penetrate the human body and puncture internal organs.

54. DOMINGO examined the remote control cars that the CHS had purchased and saw that the remote controls would work only up to a distance of 100 feet. DOMINGO expressed concern that the blast radius would extend beyond 100 feet. The CHS said perhaps the remote controls could be modified so that they would work from a distance of more than 100 feet. DOMINGO then said that if they conducted the attack at the Santa Monica Pier, he would remain on the pier and detonate the IED, but the CHS should stay further away and leave the scene after the IED detonated. DOMINGO said he would bring his gun, and was not afraid to die a martyr.

55. DOMINGO showed the CHS a map of the Santa Monica Pier on his phone, and pointed out locations where they could stand near the entrance to the pier.

56. After about 45 minutes, the UC arrived. DOMINGO asked the UC if the remote control could be modified to detonate the IED from up to three quarters of a mile away. DOMINGO showed the UC the boxes of three-inch nails he had bought, and told the



UC the nails were long enough to kill their intended victims, so long as the nails did not get bent in the blast.

57. DOMINGO explained to the CHS and the UC that they were discussing a very serious matter, and even talking about it was a crime. DOMINGO asked the UC how long it would take to make the IED, and the UC said it would take a few days.

58. DOMINGO asked again about the 100-foot reach of the remote control, and the UC suggested they could use a timer instead of a remote control to detonate the device. DOMINGO replied that "would be perfect," because with a timer "we can bail" and watch the blast from a safe distance.

59. DOMINGO said they should consider delaying the operation because he wanted to finish reading the Quran and experience Ramadan, which would be starting on May 5, 2019. The UC again said they should all agree they would not pressure each other.

60. DOMINGO gave the UC his phone number and said he would get back in touch in a few days. DOMINGO stressed that they should talk only on the platform, and cautioned the CHS and UC that what they were talking about were "federal charges." He offered to buy more parts for the IED if the UC needed them, and said he would let them know when he was ready to proceed with the operation and when the UC should complete the IED. The UC asked how he would know when DOMINGO was ready for him to complete the IED. DOMINGO said he would send the UC a message containing a photograph, like a "meme," which would be the "go ahead" for the operation.

**J. DOMINGO Finalizes His Attack Plans**

61. On the evening of April 24, 2019, DOMINGO spoke to the CHS online. DOMINGO said was angry and had a rough day at work. The CHS said the UC had said people were talking about going to the Long Beach rally so it seemed the rally was really happening, and they could execute the operation as previously planned.

62. DOMINGO replied that he did not want to rush into the operation, and since they had talked about waiting until after Ramadan, he did not want to call the UC now and rush the UC to finish making the IED. DOMINGO said if he had known yesterday that the event was going to go forward, he would have wanted to proceed with the operation. The CHS replied that the UC said the IED could be ready in time for the event, and they could use the timer to detonate it and watch the explosion from a safe distance. DOMINGO said, "the timer is great," but said, "Lets not rush into this headfirst. If I give the go ahead [. . .] one of us will have to drive to Victorville" to collect the completed IED from the UC, or perhaps meet the UC halfway.

63. The CHS replied it would be great to watch the explosion from a distance, and DOMINGO agreed it "would be cool" to watch it but "ideally we should be gone" because everyone would be panicking and their calm demeanor may arouse suspicion. The CHS said they could set the timer and then go home and watch the blast on television, and DOMINGO said he did not need publicity, and would "rather just hear about it on 4chan."

DOMINGO said, "I know it's gonna be big. [. . .] Let me just sleep on it."

64. The CHS said the CHS was ready to go forward with the operation, and DOMINGO asked if the CHS already told the UC to complete the IED. The CHS said no, and DOMINGO said they should not contact the UC over the phone. DOMINGO continued, "Fuck, it's a good opportunity. But let me sleep on it." DOMINGO said he was worried they were "rushing into this too hastily," and he wanted to act while they were all "motivated," but also wanted to be "calculated." He continued "I say me and you we'll sleep on it. If [the UC's] down, I don't have a problem with it." The CHS said they could proceed with the operation and still conduct more attacks after Ramadan, and DOMINGO replied "We can. Let's just sleep on it. If we're still as motivated, we'll give the go-ahead. I'll give the go-ahead."

65. The CHS suggested they could place the IED the night before the event, but DOMINGO said that would be too risky because people might see it. The CHS suggested placing the IED in a trash can to conceal it, but DOMINGO said the rally attendees would be unlikely to gather near a trash can, so putting the IED in a trash can would not result in a lot of deaths. DOMINGO proposed instead that they go to the event "as it's happening" and place the IED where people were gathering. The CHS offered to carry the IED into the event, but DOMINGO replied, "I was thinking I'd do it. I'd blend in." The CHS said the UC also could blend in with the "Nazis" because the UC was Caucasian. DOMINGO replied he was "ready," but "this shit

we're talking about isn't easy." DOMINGO suggested again that they sleep on it, and if "we're still feeling pumped by lunch," then DOMINGO would contact the UC to proceed with the operation.

66. The next day, at approximately 12:00 p.m., DOMINGO sent the UC a message containing a photograph of a crescent moon and skyline. Based on my training and experience and knowledge of this investigation, I believe this was the "go ahead" meme that DOMINGO had told the UC he would send when he was ready to proceed with the operation.

67. The UC responded, "Okay I hear and obey." DOMINGO wrote "im waiting for the homies text, I think the kick back is gonna be on the weekend?" The UC replied "I need to wrap the presents to make them fit in at the party spot." DOMINGO wrote "okk do what you need to do the party is on the weekend tho u didn't have to do all this today." The UC responded that it was OK and "the presents will be ready tomorrow morning." DOMINGO replied "if ur sure ok then keep em somewhere no one will fuck with em."

68. The UC asked DOMINGO for help with wrapping the "presents" and asked "do you know what the party spot looks like? I want to match the wrapping with what's natural." DOMINGO replied "you don't have something like convenient like a bag y go thru the trouble."

69. The next morning, April 26, 2019, DOMINGO wrote to the UC, "are you coming to LA?" The UC replied "Yeah akhi after I finish the last piece of the presents." DOMINGO replied "keep the presents somewhere safe lol." The UC said the UC wanted to

"stay in la for the party" and DOMINGO replied "ok no prob im sure [the CHS's] couch is good."

70. DOMINGO said he was going to Victorville to see someone and the UC replied "we need to plan the party today in shā Allah heading to [Victor]ville after the party is a good idea." DOMINGO replied "I'll talk with [the CHS] on [the platform] considering our scheds it shud be simple [. . .] tho find the parties address and show up but like I said the prayer times so we'll jus say hi n go." The UC said "Ok inshaAllah place is crucial Youre good at this akhi," and DOMINGO replied "im just practical albeit blunt as shit."

71. DOMINGO said he was going to work out, shower, get groceries, pray, then "ill be on my way afternoon." DOMINGO wrote "u want me to pick u up? Is that what u had in mind?? I mean I think the party is on sunday [. . .] so we got time ya kno." The UC wrote that they needed to meet that day and DOMINGO replied "if you insist prolly later tonight then," and agreed to meet the UC and CHS at 7:00 p.m.

72. At approximately 7:15 p.m., DOMINGO met with the UC and CHS to finalize plans for the operation. The meeting was audio and video recorded. The UC showed DOMINGO how to operate what DOMINGO thought were completed IEDs. DOMINGO said they should set the timer on the IEDs for 5 to 30 minutes.

73. DOMINGO then drove the UC and the CHS to Bluff Park in Long Beach to surveil the location for the attack. During the drive, DOMINGO said the plan was to arrive early in the morning on Sunday, before too many people showed up for the rally, and

disguise themselves as counter-protestors. As DOMINGO drove past the Port of Long Beach, DOMINGO told the UC and CHS that if they survived the attack on Sunday, they could conduct further attacks, including at the Long Beach Port, which DOMINGO said would significantly disrupt the U.S. economy. DOMINGO also discussed initiating an attack on a train.

74. When they arrived at Bluff Park, DOMINGO walked around the location with the UC and CHS. DOMINGO said they should try to find the most "crowded" areas in order to kill the most people in the attack. DOMINGO instructed the UC and CHS that after they detonated the explosives, they should walk away from the event in separate directions and get in separate cars to leave the scene without being detected.

75. After surveilling the location, DOMINGO drove the UC and CHS back to their previous meeting location, where they again inspected the IEDs in advance of their attack. DOMINGO then carried one of the IEDs out of the location to put into the UC's vehicle, at which point he was arrested by the FBI.

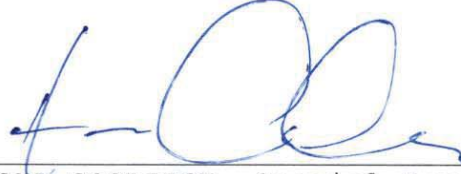
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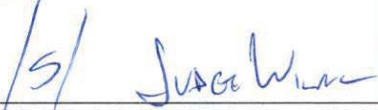
V. CONCLUSION

76. For the reasons described above, I respectfully submit there is probable cause to issue the requested criminal complaint and arrest warrant.



TASHA COOLIDGE, Special Agent  
FEDERAL BUREAU OF INVESTIGATION

Subscribed to and sworn before  
me this 24<sup>th</sup> day of April, 2019.



UNITED STATES MAGISTRATE JUDGE