

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.

Case No. 22-mj-176

SHAHRAM POURSAFI
a/k/a "Mehdi Rezayi"
DOB: 9/21/1976

Defendant(s)

AMENDED CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of October 1, 2021 through on or about April 30, 2022 in Iran and, therefore, outside of the jurisdiction of any particular state or district of the United States, but within the extraterritorial jurisdiction of the United States and, pursuant to Title 18, U.S.C. §§ 3237 and 3238, within the venue of the United States District Court for the District of Columbia, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 1958(a) and 18 U.S.C. § 2339A.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Randi Beck (handwritten signature)

Complainant's signature

Randi Beck, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Cr. P. 4.1 by telephone.

Date 8/5/2022

Robin M. Meriweather (handwritten signature)

Judge's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Randi Beck, being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (hereinafter referred to as "FBI") and have been so employed since August 2010. As such, I am an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Titles 18 and 21 of the United States Code. I have been the lead agent for extraterritorial investigations targeting foreign terrorist organizations. I have testified before Grand Juries, conducted physical and electronic surveillance, administered confidential sources, and received training as investigative techniques evolve.

2. This affidavit is being submitted in support of a criminal complaint alleging that SHAHRAM POURSAFI, a/k/a "Mehdi Rezayi" (hereinafter referred to as "POURSAFI"), violated the following federal criminal laws: (1) 18 U.S.C. § 1958(a) (Use of interstate commerce facilities in the commission of murder for hire), and (2) 18 U.S.C. § 2339A (Providing and attempting to provide material support to a transnational murder plot).

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, law enforcement records, court-authorized searches, witness interviews, and my training and experience, as well as the training and experience of other law enforcement agents. When I provide in this affidavit direct quotations of statements, they are often preliminary translations of statements that were made in the Farsi language.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known

to me concerning this investigation. I have only set forth the facts that I believe are necessary to establish probable cause that the defendant violated the federal criminal laws set forth herein.

SUMMARY OF OFFENSE CONDUCT

5. On or about January 3, 2020, Qasem Soleimani, the former commander of Iran's Islamic Revolutionary Guard Corps – Qods Force (hereinafter referred to as "IRGC-QF"), was killed by a U.S. air strike in Iraq. Certain members of the leadership of Iran denounced the killing and have publicly vowed revenge. On or about January 3, 2022, Iranian President Ebrahim Raisi gave a public address in which he stated that former President Trump and other former high-ranking officials in the Trump Administration needed to face trial for the air strike targeting Qassem Soleimani. Raisi vowed that the "fist of revenge would extend from the sleeve of the Islamic ummah" if those responsible did not face trial. Then, on or about January 7, 2022, the current IRGC-QF Commander, Esmail Ghani (hereinafter referred to as "Ghani") at a ceremony marking the second anniversary of the death of Soleimani, emphasized that Iran would take revenge for Soleimani's death in its own way. He specified, "We will prepare ground for the hard revenge against the U.S. from within their homes, as we do not need to be present as supervisors everywhere, wherever is necessary we take revenge against Americans by the help of people on their side and within their own homes without our presence."

6. POURSAFI is a 45 year-old citizen of Iran. According to records of U.S. Customs and Border Protection, POURSAFI has never visited the United States.

7. Beginning at least in or around October 2021 and continuing to at least in or around April 2022, POURSAFI used and caused others to use the facilities of interstate commerce, and caused others to travel in interstate commerce, to arrange for and with the intent to murder former National Security Advisor John Bolton (hereinafter referred to as the "FORMER

GOVERNMENT OFFICIAL” or “FORMER GO”). The murder was to be committed in the United States in exchange for payment in excess of \$250,000. POURSAFI acted from Iran, with others, to arrange for the murder of the FORMER GO in the District of Columbia or Maryland.

8. As described in more detail below, certain acts or omissions in furtherance of the specified crimes occurred within Washington, D.C. In addition, the specified crimes began or were committed out of the jurisdiction of any particular state or district, and no offender is known to have, or have had, residence within any United States district.

PROBABLE CAUSE

POURSAFI attempts to recruit INDIVIDUAL A

9. In or around 2021, POURSAFI met INDIVIDUAL A on a social media site. POURSAFI identified himself to INDIVIDUAL A as Shahram Poursafi, and the account POURSAFI used had the display name, “Shahram Poursafi.” POURSAFI told INDIVIDUAL A that POURSAFI was located in Iran.

10. On or around October 22, 2021, POURSAFI asked INDIVIDUAL A to take photographs of the FORMER GO. POURSAFI provided the first and last name of the FORMER GO, and a photograph of the FORMER GO, to INDIVIDUAL A. POURSAFI told INDIVIDUAL A he needed the pictures for a book that POURSAFI was writing. POURSAFI said that if INDIVIDUAL A could find someone to take the requested photographs, POURSAFI would pay that person. In response, INDIVIDUAL A then told POURSAFI that he/she could introduce POURSAFI to an associate who could take the photographs and videos as requested (hereinafter referred to as the “CONFIDENTIAL HUMAN SOURCE” or “CHS”). POURSAFI asked INDIVIDUAL A to suggest a price on behalf of the CHS. INDIVIDUAL A told POURSAFI that the CHS wanted \$5,000-\$10,000 USD in exchange for pictures or videos.

11. In or around late October 2021, POURSAFI asked INDIVIDUAL A whether the CHS had family in Iran who could receive the money. POURSAFI stated that this would provide some guarantee to POURSAFI. INDIVIDUAL A told POURSAFI that the CHS had no family in Iran, and POURSAFI stated that POURSAFI preferred to wait until receipt of the photographs or videos before sending any money to the CHS in the United States.

POURSAFI solicits assistance from the CHS

12. On or about November 9, 2021, the CHS contacted POURSAFI on an encrypted messaging application. After making contact, POURSAFI directed the CHS to communicate with POURSAFI using a second messaging application, which also advertises its services as encrypted. POURSAFI provided instruction to the CHS to set up and use the second messaging application in a way that he said would increase its security. POURSAFI subsequently engaged in communications with the CHS on the second messaging application. POURSAFI's account was listed as "mehdirezayi" and was associated with a telephone number that he had not used with INDIVIDUAL A.

13. On or about the same day, POURSAFI asked if the CHS could hire someone for "them" for \$200,000 in order to "eliminate someone." POURSAFI also said that he had a second job for \$1 million. After further discussion about how the money would be transferred, POURSAFI offered to provide \$250,000 total for killing "someone." POURSAFI indicated this amount would compensate the CHS \$50,000 for arranging the murder and an additional \$200,000 for the person or persons who carried out the murder.

14. On or about the same day, the CHS asked POURSAFI to be direct about his request so there was no misunderstanding as to what POURSAFI had requested. POURSAFI responded that he wanted "the guy" purged or eliminated. POURSAFI then told the CHS the FORMER GO's

first and last name and clarified that the FORMER GO was the target. Your affiant notes that when POURSAFI previously referred to killing “someone” or “the guy,” he appears to have been referring to killing the FORMER GO. The CHS asked how the FORMER GO should be “purged” and POURSAFI responded “by car,” which the CHS understood to be an example of a method. POURSAFI said the operation was easy to do and indicated that the FORMER GO took walks in the park alone. POURSAFI reiterated the payment for the job would be \$250,000.

15. On or about November 14, 2021, POURSAFI told the CHS that they did not need pictures anymore. POURSAFI told the CHS to do the work and finish the job. POURSAFI told the CHS to gather information about the FORMER GO him/herself so he/she had a better understanding, but to ask POURSAFI if the CHS needed help. The CHS told POURSAFI that he/she had spoken with an individual about carrying out the killing. The CHS told POURSAFI that the individual was interested in the job, but was not happy with the dollar amount. POURSAFI told the CHS that his group had people in both Iran and the United States who could help provide protection for the CHS, and the person the CHS would hire, after the job was complete. POURSAFI told the CHS to open a digital currency account to arrange for payment. POURSAFI reiterated that his group only paid for completed work and that any advance payments would be held in escrow. In response to the CHS’s request for advance payment or guarantee that he/she would be paid, POURSAFI said he would try to personally vouch for the CHS’s work in order to get an advance payment for the CHS, but noted it would be better if the CHS could finish the job first. POURSAFI explained that if POURSAFI provided money to the CHS and the work was not completed, then POURSAFI’s group would be angry.

16. On or about the same day, the CHS asked POURSAFI for help in locating and targeting the FORMER GO. POURSAFI told the CHS to find the FORMER GO’s address on the

Internet. After repeated requests from the CHS, POURSAFI then provided the FORMER GO's office address in Washington, D.C. This information included the name and contact information for someone in the office. POURSAFI noted this was the FORMER GO's office and that the point of contact listed online was the person that set up the FORMER GO's work schedule.

17. According to open source information, as of December 13, 2021, your affiant notes the website for the FORMER GO's work entity mirrored the information provided by POURSAFI to the CHS.

18. During the course of the investigation, the FBI executed a judicially authorized search warrant on one of POURSAFI's online accounts (hereinafter referred to as "Online Account 1"), which has a username that contains the full name "shahrapoursafi" and used the same email address as other online accounts associated with Poursafi. The FBI identified several occasions on or about November 14, 2021, in which the user of Online Account 1 searched for the address and zip code of the FORMER GO's office building and the surrounding area. Your affiant notes this is the same day POURSAFI provided the FORMER GO's office address to the CHS. In addition, the FBI also executed a judicially authorized search warrant on another of POURSAFI's online accounts (hereinafter referred to as "Online Account 2"). Records received from the provider of Online Account 2 show that the account was registered to "Shahram Poursafi" on June 21, 2015, and a phone number associated with the account was the same number used to communicate with the CHS. In the search of Online Account 2, the FBI found a deleted note dated on or about November 18, 2021, with Farsi and English text that contained the FORMER GO's name, website, social media account name, and former title.

19. On or about November 19, 2021, the CHS asked POURSAFI how POURSAFI wanted the job done. POURSAFI responded that it did not matter and what was important was that

the FORMER GO was finished and taken out. POURSAFI said his group did not need recognition for the job. POURSAFI also said his group needed video confirmation of the death either via the news or the CHS needed to take a video at the time of death. But, POURSAFI believed the death of the FORMER GO would make the news. POURSAFI told the CHS his group had a lot of experience with this type of work. POURSAFI told the CHS they (meaning POURSAFI and the CHS) had years of work to do together.

20. On or about the same day, the CHS informed POURSAFI that the individual he/she had previously spoken to had agreed to carry out the killing. The person that he/she had hired to carry out the killing was opening a digital currency account. POURSAFI reiterated “they” (meaning POURSAFI and his group) would only pay upon completion of the job, and if the CHS, and the person he/she hired, could not accept those terms, “they” (meaning POURSAFI and his group) would go to a second team. Based on the context of this conversation, your affiant believes POURSAFI was indicating that if the CHS did not agree to the stated terms, POURSAFI and his group would turn to another person or team to conduct the attack. POURSAFI reemphasized the price was \$250,000, which was contingent upon the FORMER GO’s death. The CHS asked POURSAFI for \$300,000 so there was enough for both the CHS and the person he/she hired to kill the FORMER GO. POURSAFI responded that he would talk to his group about it and would take care of it.

21. On or about the same day, POURSAFI told the CHS that he/she had enough information to find the FORMER GO. The CHS said that it would be easier if he/she had the FORMER GO’s residential address, but POURSAFI responded that the office address the CHS already had was best and to move forward.

22. On or about the same day, POURSAFI told the CHS that he would give the CHS a phone number with which the CHS could set up an account on the first messaging application. POURSAFI said he would obtain a new phone number and verification code in Iran to activate that phone number, and send it to the CHS in the United States through the second messaging application. POURSAFI told the CHS to get a cheap phone on which to load the new number. POURSAFI then told the CHS to set up an account on both the first and second messaging applications on the new phone using the number that POURSAFI provided.

23. On or about November 21, 2021, POURSAFI told the CHS he spoke with “them” about the money and was able to get the payment amount of \$300,000 approved. But, POURSAFI explained that they would not be able to increase the amount again in the future. POURSAFI told the CHS that if POURSAFI asked his superiors about the money again, the operation would be taken away and given to another team. POURSAFI promised to provide pre-payment for future jobs.

24. On or about November 23, 2021, the CHS told POURSAFI he/she traveled from Texas to Washington, D.C. The CHS went to the address POURSAFI previously provided for the FORMER GO’s office in Washington, D.C. The CHS spoke with POURSAFI in front of the FORMER GO’s office and sent POURSAFI two surveillance pictures of the FORMER GO’s office. POURSAFI thanked the CHS. The CHS described the building and parking structure to POURSAFI. POURSAFI noted the parking garage would be a good place to kill the FORMER GO and asked the CHS to check out the parking space for a specific office number, which your affiant notes is the FORMER GO’s office suite number. The CHS told POURSAFI the garage was a high traffic area. When asked by the CHS for more information about the FORMER GO, POURSAFI said he did not have anything else. POURSAFI said the FORMER GO’s residential

address was more difficult to find than the work address, and POURSAFI encouraged the CHS to do his/her own research. POURSAFI told the CHS that the FORMER GO walked or was driven to work. POURSAFI told the CHS that killing the FORMER GO would be easy and would not take long.

25. In the search of POURSAFI's Online Account 2, the FBI found a video recording dated on or about the same day, of the conversation between POURSAFI and the CHS on the second messaging application. The video showed POURSAFI's key strokes and POURSAFI taking screenshots of the two surveillance photographs of the FORMER GO's office. Your affiant submits that POURSAFI was recording a video of his mobile phone while he and the CHS exchanged messages on the application.

26. In the search of POURSAFI's Online Account 2, the FBI also found the two screenshots of the two surveillance photographs provided by the CHS to POURSAFI. The time and date stamp of the screenshots indicate that they were taken during POURSAFI's communications with the CHS – and they appear to be screenshots of a conversation between POURSAFI and the CHS that took place on the second messaging application.

27. In the search of POURSAFI's Online Account 2, the FBI also found two screenshots dated on or about November 25, 2021; taken from a maps application showing a street view of the FORMER GO's office building. One view was of the building itself and the other view was of the building across the street. One screenshot noted that the office building's address was "10,162 km" away, which your affiant believes indicates the distance between the phone's location and the location shown on the map. Your affiant also notes that a distance of 10,162 km is consistent with the distance between Washington, D.C. and Tehran, Iran.

28. On or about November 27, 2021, the CHS told POURSAFI that the person he/she had hired to kill the FORMER GO had bought a cheap burner phone that cost \$250, as previously instructed by POURSAFI. The CHS asked POURSAFI for reimbursement. POURSAFI responded that he did not want to reimburse an amount so small, but POURSAFI said he would approve sending money to the CHS upon receipt of a digital currency wallet. POURSAFI said he would provide payment within one hour of receiving the wallet. POURSAFI told the CHS he did not just want the CHS for one job; he wanted to use the CHS for future jobs.

29. On or about November 30, 2021, POURSAFI provided a new number, and verification code, for the CHS to use on the second messaging application on the burner phone. POURSAFI explained that the second messaging application was better than the first messaging application. The CHS then called POURSAFI from the second messaging application on the burner phone. POURSAFI told the CHS not to use the burner phone to call anyone else besides POURSAFI.

30. On or about December 1, 2021, POURSAFI told the CHS he did not want the money getting traced back to either of them. POURSAFI told the CHS to send the digital currency wallet to POURSAFI via the second messaging application. The CHS sent POURSAFI the identifiers for the digital currency wallet. POURSAFI confirmed receipt and told the CHS to delete the information about the wallet from the chat. The CHS asked POURSAFI to send the CHS \$3,000 in reimbursement, and POURSAFI responded he would send the money on December 4, 2021.

31. During the FBI's search of POURSAFI's Online Account 2, the FBI found a screenshot of a conversation, with the digital currency information provided by the CHS on the

second messaging application, in POURSAFI's Online Account 2, dated on or about December 1, 2021.

32. On or about December 2, 2021, after repeated requests to POURSAFI for the FORMER GO's residential address, the CHS informed POURSAFI that the person he/she had hired to kill the FORMER GO found the FORMER GO's address. The CHS also informed POURSAFI that the CHS and the person he/she hired to kill the FORMER GO were at the FORMER GO's home that morning taking pictures. POURSAFI told the CHS that, in POURSAFI's experience, if one took too long to plan something, the window of opportunity could be gone. The CHS thanked POURSAFI for his advice and said he/she had no experience in the spy world or any training in killing people. POURSAFI said this was "okay." POURSAFI told the CHS he would take care of the money on December 4, 2021.

33. On or about December 4, 2021, the CHS asked POURSAFI why he/she had not received the agreed payment for expenses. POURSAFI responded that his group was working on the payment. The CHS then asked POURSAFI how he wanted the FORMER GO killed and whether he wanted it publicized. POURSAFI responded that, for his group, it was better if the body was found but deferred to the CHS on how to kill the FORMER GO. The CHS asked POURSAFI what would happen if the killing were attributed to Iran. POURSAFI responded that the CHS should not worry about that and that POURSAFI's group would take care of that. The CHS asked POURSAFI what his experience was with killing and this "type of work." POURSAFI responded that it was like crossing the street: it was better not to spend too much time looking in one direction, but just to do it. POURSAFI cautioned the CHS not to take too much time figuring things out. The CHS asked POURSAFI why his group wanted to kill the FORMER GO when others from the Trump Administration had done more to hurt Iran. POURSAFI responded that

often orders came down and they could not ask why; they would just need to complete the job. POURSAFI also admonished the CHS not to talk about these things over the phone and to be careful when on the phone. POURSAFI told the CHS to speak about the job in terms of construction and building.

34. On or about December 5, 2021, POURSAFI told the CHS he put the request for the money in, but it was taking longer than anticipated.

35. On or about December 7, 2021, POURSAFI informed the CHS that the group did not approve the payment/deposit. The CHS tried calling POURSAFI on the first messaging application and POURSAFI told the CHS to move to the second messaging application on the burner phone. The CHS called POURSAFI on the second messaging application and POURSAFI explained that POURSAFI fought to get the reimbursement for the CHS, but “they” said no one could get pre-payment due to a recently failed operation. POURSAFI said that prior to the failed operation, POURSAFI’s group had approved of the pre-payment to the CHS.

36. On or about December 10, 2021, POURSAFI told the CHS he wanted the job done by the end of the year. POURSAFI assured the CHS that the CHS would be paid after the job was complete. The CHS noted the FORMER GO’s residence was in a high traffic area and that he/she had not seen the FORMER GO yet. POURSAFI said the FORMER GO does not go outside very often. The CHS told POURSAFI that the person he/she hired to kill the FORMER GO used to work for a cartel.

37. On or about December 14, 2021, POURSAFI asked the CHS to provide regular updates because POURSAFI’s group was asking about his communications with the CHS. POURSAFI told the CHS he was trying to work on an advance payment for the CHS, but did not want to promise anything.

38. On or about December 16, 2021, POURSAFI asked the CHS not to use the FORMER GO's true name, and to instead refer to the FORMER GO as "Behnam." POURSAFI asked the CHS to get the job done fast. POURSAFI said that he had updated his "bosses" that the CHS found the FORMER GO's residential address, and that the CHS had conducted activity in furtherance of the job. When the CHS asked how POURSAFI wanted the killing to hit the media, POURSAFI responded that he had asked the CHS to build a structure and that the method of construction was up to the CHS. POURSAFI told the CHS to do it any way he/she could.

39. On or about December 18, 2021, POURSAFI asked the CHS if the CHS was going to stay in Washington, D.C. until the job was completed or return to Texas. POURSAFI also told the CHS he would send a photograph showing that the money was in escrow the next day.

40. On or about December 20, 2021, the CHS was in Washington, D.C. With the consent of the Former GO, the CHS sent POURSAFI two photographs of the FORMER GO exiting his office building in Washington, D.C. In response, POURSAFI asked why the CHS did not do the job in the area around the office building. The CHS responded that there were security cameras in the vicinity. The CHS then sent POURSAFI a surveillance video of the FORMER GO outside his office building. POURSAFI thought the surveillance video was risky for the CHS to have taken, but admitted it was good for POURSAFI to have. The CHS asked POURSAFI if there was another individual who had done worse to Iran and whom they should target instead, such as another named former high-ranking United States Government official from the Trump Administration. POURSAFI told the CHS that targeting that official was dangerous because there were a lot of people around him/her, but that his/her time would come. POURSAFI wanted the CHS to focus on the first job and then there would be other jobs. Regarding the photograph of the money, POURSAFI told the CHS that he forgot to put CHS's name in the picture with the money

in escrow, and had asked his contact to resend the photograph. The CHS informed POURSAFI that he/she could not go to the FORMER GO's home in Maryland that day, but would try the next. The CHS told POURSAFI that the person he/she hired to kill the FORMER GO was originally from Mexico and maintained contacts with a cartel.

41. On or about December 21, 2021, the CHS told POURSAFI he/she went by the FORMER GO's home in Maryland. POURSAFI told the CHS once the job was complete, POURSAFI would give the CHS a new number which could be used to contact POURSAFI's office directly.

42. On or about December 22, 2021, the CHS informed POURSAFI that the CHS was flying from Washington, D.C. back to Texas that day. POURSAFI promised that the CHS would have the picture of the money in escrow by the time the CHS landed in Texas. POURSAFI then sent a photograph of two plastic bags that each appeared to contain bound stacks of U.S. currency. In between the bags was a hand-written note with the following text, "[CHS] 22.12.2021." (*Images below.*) POURSAFI told the CHS the money for the next job had been prepared. POURSAFI then deleted the picture from their chat history after POURSAFI gave the CHS an opportunity to share it with the person he/she had hired. In addition, POURSAFI told the CHS not to save any pictures or videos to his/her mobile device. POURSAFI told the CHS to finish the job as it was taking a long time.



43. On or about December 23, 2021, the CHS asked POURSAFI if his superiors were pleased with the pictures and video the CHS had provided to date. POURSAFI told the CHS that POURSAFI was in charge and that he liked the photographs and videos provided by the CHS.

44. On or about December 29, 2021, POURSAFI asked the CHS when the job would be completed. POURSAFI's group was happy with CHS's efforts, but wanted the job done quickly.

45. On or about January 3, 2022, POURSAFI asked for an update from the CHS on when the job would be complete. POURSAFI noted he was under pressure from his people. POURSAFI said he had to report any delays or problems that could occur with the operation. The CHS asked how many people were involved with POURSAFI. POURSAFI responded that he had one boss to answer to, but it was a chain of command and his boss likely had superiors as well.

POURSAFI said the longer the plan took, the more likely the plan would be exposed, which is why POURSAFI's superiors were concerned.

46. On or about the same day, POURSAFI told the CHS the job was not related to the second anniversary of Soleimani's death. POURSAFI added that it would have been better for POURSAFI's group if the job had been done by the anniversary of Soleimani's death, however, the anniversary had come and gone. POURSAFI told the CHS that he had known Soleimani. POURSAFI told the CHS that he was worried the job would be taken from them if the CHS did not complete it soon.

47. On or about the same day, POURSAFI asked if the CHS could do the job in the same place the CHS took the video. This likely referred to the video of the FORMER GO near his/her office. POURSAFI told the CHS that his superiors wanted an update on the type of weapons the CHS planned to use. POURSAFI noted if they used a small weapon, it would require being up close, but with a larger weapon, they would not have to be as close to the target. POURSAFI also noted he had a source that told him the FORMER GO was at home.

48. The FBI has determined that the FORMER GO was at home during the 2021 Christmas and New Year holidays. Your affiant notes that POURSAFI also apparently understood from the unidentified source that the FORMER GO was at home during that time. POURSAFI did not specify whether his source was a person conducting surveillance, a cyber intrusion, or another type of source.

49. On or about January 5, 2022, the CHS informed POURSAFI he/she would go to Washington, D.C. on either January 16 or 17 and would finish the job on or before January 21. POURSAFI told the CHS the dates were very late and said he would talk to his superior the next day.

50. On or about January 6, 2022, POURSAFI told the CHS he spoke with his people that morning and they wanted to know if the CHS could really do the job in 10 days. POURSAFI explained that the longer the job took, with no defined timeline, the more problematic it became and the more questions arose from people on POURSAFI's "side." When the job got delayed, it caused the group to become suspicious. POURSAFI emphasized this would be the last chance for the CHS to finish the job.

51. On or about January 10, 2022, the CHS informed POURSAFI he/she had seen the article about Ghani's speech in which he spoke of destroying 50 U.S. officials in the United States. POURSAFI interjected that Ghani's comments were propaganda. The CHS asked if Ghani was talking about the CHS's job. POURSAFI did not respond. The CHS told POURSAFI that the CHS wished he/she had known POURSAFI was working for Ghani, but POURSAFI replied that POURSAFI and the CHS were "just a few guys who had come together." Additionally, POURSAFI warned the CHS not to say such things on the phone. POURSAFI again asked that the CHS let him know before the operation was to occur and to take a video afterwards.

52. On or about January 11, 2022, the CHS told POURSAFI he/she wanted to come to Iran after the operation was over, but was worried about having an Iranian stamp in his/her passport. POURSAFI reassured the CHS he would take care of it.

53. On or about January 15, 2022, POURSAFI asked the CHS how preparations for the trip were going. The CHS responded that he/she had procured three different vans and he/she wanted to darken the windows. POURSAFI told the CHS to only dirty the windows with mud and paint, otherwise it would attract attention. The CHS added that weapons, silencers, and bullets were ready as well. POURSAFI cautioned the CHS not to say those things on the phone.

54. On or about the same day, POURSAFI asked the CHS if he/she had any news about "Behnam." POURSAFI told the CHS that the FORMER GO's routine was the same as the CHS had seen before, including his work routine. The CHS said he/she would go to the FORMER GO's workplace, home, and other places the CHS thought the FORMER GO might go.

55. On or about the same day, POURSAFI told the CHS he had one mobile phone for talking with the CHS and another for his personal matters. POURSAFI instructed the CHS to delete everything from the CHS's mobile phone that was used for communication with POURSAFI; to "crush it" and "delete it." POURSAFI next told the CHS to break it in such a way that no one could put it back together. POURSAFI told the CHS to get rid of his/her phone before going to the airport and not take it with him/her. POURSAFI told CHS there should be nothing on the CHS's phone, to include messages with POURSAFI as well as messages with the CHS's family, etc. POURSAFI suggested changing POURSAFI's name in the CHS's phone to a "foreign name" like "Mark." POURSAFI would give the CHS another phone number later. POURSAFI reiterated he was ready to pay the CHS as soon as the CHS confirmed the job had been done.

56. On or about the same day, POURSAFI informed the CHS that he "saw the big picture" and realized it was better if the CHS set up two cryptocurrency accounts to which POURSAFI could send the payments. POURSAFI described putting one account in the CHS's name and another in the name of a person the CHS trusted. If something happened to one of the accounts, there would still be money safely in the other account. POURSAFI confirmed the money was ready for payment, but asked the CHS to set up the second account before going back to Washington, D.C.

57. On or about the same day, POURSAFI informed the CHS he had no more meetings with his group scheduled; he had done everything he needed to do and was waiting for the CHS to

complete the work. POURSAFI instructed the CHS to limit phone usage until the operation was complete and to finish the job “completely” and to leave “nothing undone.”

58. Lastly, on or about the same day, POURSAFI confirmed he had a second job for the CHS after successful completion of the first job. POURSAFI cautioned that at this time the CHS needed only to focus on this first job.

59. On or about January 16, 2022, the CHS informed POURSAFI he/she was at the airport en route to Washington, D.C.

60. On or about January 18, 2022, CHS sent POURSAFI a copy of publicly-available information indicating the FORMER GO might be traveling. The CHS told POURSAFI he/she believed the FORMER GO was traveling, but POURSAFI replied that “Behnam” was not traveling and that POURSAFI needed to check something. Within an hour, POURSAFI informed CHS that he was certain the FORMER GO had not traveled. POURSAFI did not specify the source of this information. POURSAFI provided the CHS with specific information regarding the FORMER GO’s schedule. Your affiant has become aware the information provided by POURSAFI was accurate. The information does not appear to have been publicly available. POURSAFI did not specify whether his source was a person conducting surveillance, a cyber intrusion, or another type of source.

61. On or about January 19, 2022, the CHS informed POURSAFI he/she had not seen or had not been able to find the FORMER GO. POURSAFI encouraged him/her to keep an eye on the FORMER GO’s office. POURSAFI told the CHS that he told “his people” that the CHS and his team were waiting for an opportunity to finish the job, but he hadn’t yet relayed that the team had lost the target. POURSAFI cautioned the CHS not to discuss the operation over this phone and told the CHS he would talk to his side to see what instructions they had.

62. On or about January 20, 2022, POURSAFI informed the CHS he was sure that the FORMER GO did not have a bodyguard. POURSAFI reinforced that the CHS should focus on the FORMER GO's office in order to complete the job. POURSAFI encouraged the CHS to finish the job as soon as he/she saw the FORMER GO because the FORMER GO was planning to leave town. When the CHS wondered whether the FORMER GO was already out of town, POURSAFI clarified the FORMER GO had not yet finalized travel plans. Your affiant notes that POURSAFI appears to have been implying that he had inside knowledge of the FORMER GO's schedule.

63. On or about January 21, 2022, the CHS told POURSAFI that his/her team had found the FORMER GO and he/she hoped they could complete the operation that evening. The CHS told POURSAFI that the FORMER GO was inside his/her home with other people. POURSAFI told the CHS to wait to finish the job until no one else was with the FORMER GO, but reiterated that the FORMER GO must not come out of his/her home after the other people left. POURSAFI encouraged the CHS not to waste time after the job was finished and not to leave anything behind, especially the phone. POURSAFI told the CHS that he had updated his superiors on the situation at the FORMER GO's home and relayed his hope the job would happen that night. POURSAFI told the CHS that the people he updated were of high rank, but he did not want to provide any additional details over the phone. Later, the CHS updated POURSAFI that the FORMER GO had left the residence, and POURSAFI asked if the CHS had a magnet GPS that could be attached to the FORMER GO's car in order for the CHS to track the FORMER GO.

64. On or about the same day, POURSAFI informed the CHS that the second job, which would be assigned once the first job was complete, was easier than the first. The CHS asked if the information was complete, or if his/her team would need to do additional surveillance and intelligence collection. POURSAFI responded the information was complete, and had been

gathered “from the United States,” not via “Google.” Your affiant notes POURSAFI appeared to be stating that his organization had conducted pre-operational surveillance in the United States.

65. On or about January 22, 2022, POURSAFI instructed the CHS that if his/her team encountered the FORMER GO in a group again, the CHS should do the job and aim at the FORMER GO, but not the others. POURSAFI only wanted the FORMER GO “taken out.” POURSAFI recommended switching cars after finishing the job to evade the police. POURSAFI informed the CHS that he had been summoned by his superiors for a meeting the next day about the operation. POURSAFI said that his “bosses” wanted the job to be done well and accurately, and their only concern was complications arising from the extended timeline to complete the job. If the CHS did not finish the job soon, POURSAFI believed his “bosses” might question the CHS’s ability or they might put the operation on pause for a while. POURSAFI said that he would not ask his group for any money for the CHS because he was having trouble with the group due to the prolonged timeline for the job.

66. On or about January 23, 2022, POURSAFI informed the CHS that, for the second job, a long-range capability was necessary, but in addition hand guns could be used.

67. On or about January 26, 2022, the CHS updated POURSAFI that a problem had occurred with the operation and that the CHS was concerned about the security of him/herself and the team. POURSAFI was hesitant to tell his “people” what had happened out of fear they would cancel the job and POURSAFI would be told to cut all ties with the CHS. POURSAFI told the CHS to delete everything from his/her phone, including all chats. POURSAFI told the CHS to change POURSAFI’s name in the CHS’s phone to a non-Iranian name. POURSAFI instructed the CHS to turn off the CHS’s personal phone and take the SIM card out. POURSAFI asked the CHS to procure a SIM-enabled camera to set up near the FORMER GO’s home so they could conduct

surveillance remotely. POURSAFI offered to check the camera for the CHS if the CHS could provide POURSAFI with the application and username and password. POURSAFI promised not to abandon the CHS should something happen, and to provide support for the CHS's family.

68. On or about January 27, 2022, POURSAFI told the CHS that he believed the CHS could still complete the operation, but that the CHS needed to follow POURSAFI's guidance. POURSAFI said he had been in "this business" for thirty years and knew "how things work[ed]." POURSAFI said that if the CHS could not do the job, POURSAFI would find another group to do it and would pay the CHS for incurred expenses from the other group's funds.

69. On or about January 28, 2022, POURSAFI reiterated to the CHS that the camera, which POURSAFI wanted installed near the FORMER GO's home, had to have a SIM card, but should not have memory. POURSAFI also suggested that the CHS procure a similar camera for the FORMER GO's office.

70. On or about January 29, 2022, POURSAFI instructed the CHS to re-install a messaging account and to begin using a new phone number on that account. POURSAFI provided the new number to the CHS. POURSAFI informed the CHS he was going to talk to his people about the CHS's job, and reiterated it was important that the CHS's team did not talk to law enforcement.

71. On or about January 30, 2022, POURSAFI directed the CHS not to mention the FORMER GO's name under any circumstance.

72. On or about February 1, 2022, POURSAFI told the CHS if he/she did not finish the job in two weeks, the job would be taken from the CHS. POURSAFI reiterated his group was experienced, knew what to do, and had done jobs like this before. POURSAFI told the CHS his group had someone who checked the area around the FORMER GO's home and found the area

was clear, meaning there was no security presence. POURSAFI said he had received this information from the highest ranking person in his group, and repeated that the CHS should finish the job.

73. On or about February 5, 2022, POURSAFI informed the CHS that he had spoken with his group for a long time and had secured a 10-day extension for the CHS to complete the job. POURSAFI told the CHS that this time around, the CHS should only listen to POURSAFI and do what POURSAFI told him. The CHS told POURSAFI that he wanted POURSAFI's guidance. POURSAFI responded he would guide the CHS "every step of the way."

74. On or about February 9, 2022, the CHS told POURSAFI that he thought the 10-day deadline was too soon to complete the job. POURSAFI told the CHS that the CHS did not have much time left and the job needed to be completed. POURSAFI reiterated to the CHS that if the job was not completed, it would be taken away from the CHS. POURSAFI would not give the CHS a smaller job first or pay the CHS any money until the primary job was complete.

75. On or about February 14 and 15, 2022, POURSAFI did not mention the 10-day extension/deadline.

76. On or about February 15, 2022, POURSAFI requested the CHS "check out" the FORMER GO's home and provide POURSAFI the CHS's observations. POURSAFI again asked the CHS to procure cameras with a SIM card, and to be in touch with POURSAFI for additional instructions.

77. On or about March 10, 2022, POURSAFI told the CHS he had another assassination job for the CHS in the United States. POURSAFI instructed CHS to "keep Behnam in the back of your mind." Additionally, POURSAFI provided the CHS with another new phone number to use.

78. On or about March 18, 2022, POURSAFI explained to the CHS that “they” do not pay in advance for the first job. Since the CHS had not successfully carried out the first job, POURSAFI was trying to get the CHS a second job, hoping the CHS could succeed at the second job. The CHS told POURSAFI he/she wished he/she had known POURSAFI was part of the Qods Force because then the CHS would have known POURSAFI was serious. The conversation continued. Your affiant notes that POURSAFI did not deny the IRGC-QF affiliation.

79. On or about April 13, 2022, POURSAFI encouraged the CHS to finish the second job and then they would work on the job to kill the FORMER GO. POURSAFI explained that if the new job was done successfully, it would give POURSAFI more leverage with his people. Your affiant assesses that, not having succeeded in carrying out the first job, i.e., to murder the FORMER GO, POURSAFI gave the CHS the second job in the hope that it would help POURSAFI ingratiate himself with his group.

80. On or about April 28, 2022, POURSAFI informed the CHS that if the CHS did not complete the second assassination, his group had others prepared to finish the operation. The CHS told POURSAFI he/she would not work on the second job until POURSAFI sent money from Iran to the CHS. POURSAFI agreed to send the CHS \$100 USD via crypto currency to the CHS to prove payment could be made. In exchange, POURSAFI demanded that the CHS finish the new job in six days. POURSAFI said he was going to tell his bosses that the second job would be completed in the next week.

81. Later the same day, at approximately 9:36 PM and 9:44 PM UTC, a cryptocurrency wallet, set up by the FBI, which the CHS had provided to POURSAFI earlier that day, received two payments of \$5 USD and \$95 USD respectively.

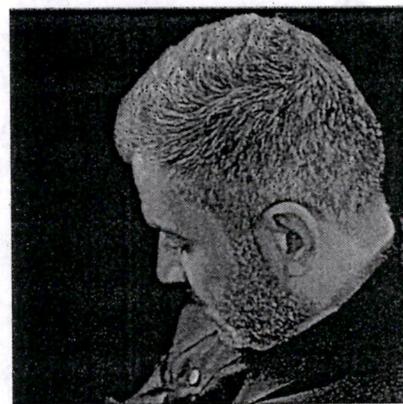
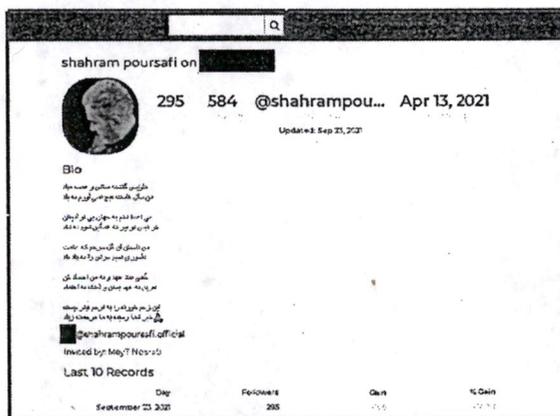
Identification

82. Your affiant has identified the person engaged in the communications with INDIVIDUAL A and the CHS described herein as Shahram POURSAFI.

83. First, the account POURSAFI used with INDIVIDUAL A on the social media site was under the display name “Shahram Poursafi.” (*Image below; left.*) POURSAFI identified himself to INDIVIDUAL A as “Shahram Poursafi.”

84. Second, as indicated above, the FBI identified an Online Account associated with POURSAFI. Online Account 2 included a phone number that was associated with one of the messaging accounts that POURSAFI had used to communicate with INDIVIDUAL A. Online Account 2 had a registration name of “Shahram Porsafi” and was associated with two email addresses that contained the name “shahrampoursafi” or “shahrampoursafi.”

85. POURSAFI used a social media site to make initial contact with INDIVIDUAL A. In the portion of the social media account that typically would include a photograph of the user, there was a photograph of a male individual. The FBI found the same picture in POURSAFI’s Online Account 2. (*Image below; right.*)



86. Within POURSAFI’s contact list in Online Account 2, the FBI found contacts for INDIVIDUAL A and the CHS, who was listed as “a1.” The FBI also found information about

other messaging accounts used by POURSAFI, including the two messaging accounts that he had used to contact INDIVIDUAL A.

87. The FBI found POURSAFI's Iranian National Identity Card in his Online Account 2. The name on the card was "Shahram Poursafi" and the picture appears to be of the same individual as the photograph found on the social media site and Online Account 2. *(Image below.)*



88. The FBI also found several photographs of POURSAFI in fatigues. One, dated on or about November 11, 2021, had a visible Iranian Islamic Revolutionary Guard Corps (hereinafter referred to as "IRGC") patch on his arm and posters of Iran and Soleimani in the background. Therefore, your affiant notes that POURSAFI is a uniformed member of the IRGC and your affiant assesses that POURSAFI is working on behalf of the IRGC-QF to hire U.S.-based individuals to murder the FORMER GO. When asked several times by the CHS whether POURSAFI was working for the IRGC-QF, POURSAFI either told the CHS not to discuss the topic over the phone or did not deny it.



CONCLUSION

89. Based on the foregoing, your affiant submits there is probable cause to believe that POURSAFI violated 18 U.S.C. § 1958(a), which makes it a crime (i) to travel in or use facilities of interstate or foreign commerce or cause another to do so, (ii) with intent that a murder be committed in violation of the laws of any State or the United States, (iii) as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value. As described herein, POURSAFI used and caused others to use facilities of interstate commerce, that is, encrypted, Internet-based messaging applications, while POURSAFI was located outside the United States, to communicate with persons inside the United States, and also caused others to travel in interstate commerce, that is, among Texas, Washington, D.C., and Maryland, with the intent that murder be committed in violation of the laws of Washington, D.C. and Maryland, in exchange for a promise of money or other pecuniary compensation, that is, digital currency.

90. Based on the foregoing, your affiant further submits there is probable cause to believe that POURSAFI violated 18 U.S.C. § 2339A, which makes it a crime to (i) provide or attempt to provide material support or resources, including personnel and services (ii) knowing or

intending that they were to be used in preparation for, or in carrying out, a violation of an enumerated crime, that is, a transnational killing of a person within the United States in violation of 18 U.S.C. § 2332b.

Randi Beck

RANDI BECK
Special Agent
Federal Bureau of Investigation

Subscribed and sworn pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on August 5, 2022.

RL Meriweather

ROBIN M. MERIWEATHER
United States Magistrate Judge