

UNITED STATES DISTRICT COURT

for the Southern District of Florida

United States of America
v.
JAMES GONZALO MEDINA

Case No. 16-mj-02562-WCT

Defendant(s)

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 April 29, 2016 in the county of Miami-Dade and Broward in the Southern District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. 2332a(a)(2)

Offense Description
Attempted Use of a Weapon of Mass Destruction; The defendant did knowingly attempt to use a weapon of mass destruction against any person or property within the United States, and the offense would have affected interstate or foreign commerce, in violation of Title 18, United States Code, Section 2332a(a)(2).

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Handwritten signature of David Clancy

Complainant's signature

David Clancy, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/30/2016

City and state: Miami, FL

Red stamp: Certified to be a true and correct copy of the document on file Steven M. Larimore, Clerk, U.S. District Court Southern District of Florida. Includes handwritten 'By' and 'Date 5/2/14'.

Handwritten signature of William C. Turnoff

Judge's signature

William C. Turnoff, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, David H. Clancy, first being duly sworn, hereby depose and state the following:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2009. Among my duties as an FBI Special Agent, I am responsible for the investigation of violations of federal law, including federal laws related to national security, terrorism support activities, and weapons of mass destruction. I am currently assigned to the FBI's Joint Terrorism Task Force ("JTTF"), where my primary responsibilities include the investigation of international terrorism.

2. I am familiar with the facts and circumstances set forth in this affidavit as a result of my participation in the investigation; as a result of my experience, training, and background as a Special Agent with the FBI and with the JTTF; as a result of personal observations and examination of relevant evidence; and as a result of information provided to me by other law enforcement officers and witnesses. The information contained in this affidavit is not inclusive of all the facts of the investigation and is provided for the limited purpose of establishing probable cause to obtain a criminal complaint. I have listened to the audio recordings of the meetings in this case and other FBI employees have prepared draft transcripts of these audio recordings. I have reviewed these transcripts but have not undertaken a precise comparison of the words on the audio recordings to the words on the transcripts. That being said, my general review of these draft transcripts indicates that they are accurate and comport with my personal knowledge of pertinent meetings. Accordingly, I am relying on these draft transcripts prepared by other FBI employees for the quoted conversation excerpts included in this affidavit.

3. This affidavit is submitted in support of a criminal complaint for the arrest of JAMES GONZALO MEDINA ("MEDINA"), who did knowingly attempt to use a weapon of

mass destruction against a person or property within the United States, where the offense or the results of the offense would have affected interstate or foreign commerce, in violation of Title 18, United States Code, Section 2332a(a)(2).

PROBABLE CAUSE

4. In late March 2016, the FBI launched an investigation of MEDINA based on his suspected desire to attack a Jewish center/synagogue in Aventura, Florida, located within Miami-Dade County, in the Southern District of Florida. MEDINA is a United States citizen living in South Florida.

5. On March 27, 2016, an FBI Confidential Human Source ("CHS") met with MEDINA and his associates. This and the other meetings mentioned in this document took place in South Florida and were recorded. During the March 27 meeting, the following conversation occurred between MEDINA (JM) and his associates (TI) and (BH) which in part concerned an interest within that group to conduct an attack on a synagogue:

CHS: That's just a lot of traffic bro.

JM: No, I, I...that's where I fish.

TI: I would rather be there with the Jews, you know rather than down here because everything is more (UI) there too.

JM: You just want to go 167th cause this guy over here [referring to an associate present at the time] wants to blow some shit up at synagogue over there.

BH: What the hell that's got to do with it?

TI: Who wanted to blow up a synagogue?

BH: That ain't got nothing to do with it.

JM: That's why he wants to go over there cause he wants you to stake out the place.

TI: Who wants to go there? ... I want to go there cause I know the place.

JM: Why you think you wouldn't not just go to 79th street pa'l carajo [PH], but no he wants to over there...why? Cause he wants to show you...

6. Later the same evening, the CHS and TI were alone in the vehicle. The conversation returned to the subject of the synagogue attack, and this time MEDINA was

mentioned as a participant. Below is an excerpt of the conversation pertaining to MEDINA's interest in attacking the synagogue:

TI: Are you still fishy about them?

CHS: Who?

TI: The Spanish boys [BH and MEDINA].

CHS: Listen, I'm not fishy about them but I am nervous that because they say the stuff that they say that they would be caught then threatened with a hefty sentence.

TI: No, no, no, no, no MEDINA told me that he wanted to go blow up... I mean not blow but like shoot up a synagogue in Aventura because he said he wanted to...to uh...he said that umm.

CHS: It's irrelevant what the reasons are.

TI: No, no, no listen listen he said he wanted to shoot it up and then die while shooting it up, like be a martyr. But (BH) said that he didn't want to get caught. I don't know what that means you know but uh...but he will defend himself. I don't know.

CHS: I don't know, I'm just saying

TI: But what I'm trying to say is that like, like, like, like, like, they were and then (BH) was surprised you know that MEDINA had like all this passion. And you know MEDINA told me...you know what (BH) told me... [OV]

CHS: MEDINA doesn't have passion.

TI: No, no listen, listen, listen...no no it's possible. I always knew in my heart...

CHS: MEDINA is suicidal, he's not a Muslim.

TI: No, no, no, no listen, listen, listen. When, when I first met him, you know what he taught me. He taught me something you know. It's not like he's not knowledgeable. It's not like he's not bullshit.

CHS: It's ok.

TI: It's not like he's not religious.

7. On April 1, 2016, MEDINA met with the CHS and at one point, while driving around in the CHS's car, MEDINA directed the CHS to the synagogue in Aventura, the site of MEDINA's intended attack. MEDINA described the synagogue ("it's a real big one"), and when they drove up to it, MEDINA pointed it out ("[Y]ou see the, the, the David's triangle star.") Then MEDINA redirected the conversation from the location of the attack to its timing. MEDINA stated, "You see it there. And you see, I mean that's where it is, but you gotta know when to go like." The CHS took up the thought and offered a proposal:

CHS: You know, you know what Yom Kippur is?
JM: Yom Kippur? I heard of that.
CHS: Yeah, uh, it's like a Jewish holiday. It's in two weeks.
JM: Hmmm. Well,--
CHS: [OV] But.
JM: --now that'll be a good day to go and bomb them...

The CHS made a mistake in that the upcoming Jewish holiday was Passover and not Yom Kippur, but MEDINA approved of the proposed timetable as a good time to conduct the attack.

8. Given that one of MEDINA's associates had informed the CHS that MEDINA was planning to martyr himself in a firearms attack on the synagogue, the CHS sought to gather further details of the operation. MEDINA confirmed his desire to conduct the attack using AK-47 assault rifles. The conversation then turned to a claim of responsibility for the attack. The CHS indicated that they should leave a "clue" as to who was responsible and MEDINA concurred, "[W]e gotta leave a note or a banner, something that in, that it resembles the letters of Arabic... We could make it up. We can print it up, a letter, something. Just leave it, like as I was, just drop it." The CHS indicated two possibilities, the terrorist groups "ISIS," a reference to the Islamic State of Iraq and the Levant ("ISIL"), also known as "ISIS," and "Shabaab," an al-Qaeda-linked organization in Somalia and East Africa. Both of these groups are United States-designated foreign terrorist organizations. MEDINA liked the idea, stating, "You can, you can do all that. Yeah, we can print up or something and make it look like it's ISIS here in America. Just like that." MEDINA felt the news of this attack conducted in this manner would go nationwide and inspire other Muslims to attack as well.

9. The CHS initially met with MEDINA alone. Over lunch, MEDINA described his conversion to Islam which occurred approximately four years ago. MEDINA explained some of his religious philosophies that form the basis for his current hatred for Jewish people. The CHS

made reference to a conversation he/she had with TI regarding a synagogue in Aventura. MEDINA explained that if he would conduct an attack he would want to do it at a synagogue because Jewish people are the ones causing the world's wars and conflicts. The CHS disclosed that TI had explained that MEDINA desired to become a martyr in the attack but the CHS offered the alternative of the CHS assisting to facilitate MEDINA's escape. MEDINA further explained that attacking one synagogue would give hope and light to other Muslims in America. The CHS asked MEDINA about the location of the synagogue and asked to see it. MEDINA explained that he knew exactly where it was and provided a description. When the CHS explained that there was a Jewish holiday in a few weeks, MEDINA responded by saying that it would be a good time to bomb them. When the CHS questioned how realistic it was for him to be able to undertake an attack, MEDINA explained that "this is how we were talking, cause you know TI has those AK-47s and that was our mission to use that at the synagogue, on using his weapons." The CHS explained to MEDINA how TI's weapons could be traced and told him he had a contact who could get them untraceable weapons. MEDINA further explained that the "plot" that he and BH had discussed allowed them to "strike back to the Jews, by going to a synagogue and just spraying everybody... 'cause we're Muslims you know what I mean? It's a war man and it's like it's time to strike back here in America." MEDINA then stated that he wanted to go inside to kill people while the others shot people as they were fleeing the scene.

10. The CHS and MEDINA then picked up BH. After initial small talk, MEDINA changed the topic of conversation by saying to BH, "You remember how we were talking about you know terrorizing the, the, the Aventura uh Masj uh Synagogue?" BH acknowledged and MEDINA explained how the CHS was "down" with the idea. MEDINA, BH, and the CHS then

traveled to Aventura and conducted surveillance of the proposed target. BH and MEDINA developed an escape route to be used after the attack.

11. On April 12, 2016, the CHS met with TI and MEDINA, and when MEDINA and the CHS were alone, the pair discussed the attack on the synagogue. MEDINA explained that he was still completely interested in the attack and MEDINA agreed with the need to conduct additional surveillance of the target.

12. On April 13, 2016, the CHS again met with MEDINA. The two traveled to a fast food restaurant and then to a local park to eat their food. MEDINA spent the majority of the meeting describing the “movies” he creates using the Internet. While discussing when the attack should occur, MEDINA stated, “I’m ready whenever you’re ready...I’m down for this. This is, I’ve already got all my life already set.” The conversation then turned toward the details of the attack, and the CHS addressed the concerns of entering the synagogue with firearms and then getting shot and instead proposed leaving an unspecified object behind and leaving the scene. MEDINA then replied, “[L]ike drop a bomb and just leave it and then it pop, just pop that bitch and we out.” The CHS talked about a timer for the bomb and MEDINA liked the idea and described nearby locations from where the bomb could be detonated, stating “[a]nd then we inside the Mall and shit, and just pop it from like...see like, see that like, them red lights over there? Them three lights over there, like way out there?” This was a reference to the local shopping mall and reference to the stoplights down the road. The CHS then described how a cellular telephone could serve to detonate the bomb, and asked MEDINA whether he would like that. MEDINA laughingly responded, “I would, I think that would be interesting.”

13. The CHS then informed MEDINA that he had a contact that could “get pretty much everything,” a reference to an associate of the CHS’s who would later be introduced into

the investigation as someone with explosives expertise and access. However, the CHS commented that he wasn't sure this purported associate would want to be involved in the plot: "I just don't know if he'll go for that. I don't want him to feel uncomfortable." The CHS then asked MEDINA how he should ask the associate for help with the explosive device: "Like when I talk to him, like how am I gonna ask him for the shit?" MEDINA answered that the CHS just needed to ask: "Well you know, you gotta ask him if he's still up for it. You know you wanna buy [UI] [SC]." The CHS added that this is what the purported associate does: "I mean he just gets shit." At this point, MEDINA pressed the CHS to set a meeting and talk to him: "Alright then uhm we gotta talk, we got, we really gotta meet the guy. I mean I don't understand though, you just gotta meet him and then we go from there. But..., you know, we gotta start from that, from the bottom. That's just it. We gotta see what we have."

14. After some unrelated conversation, MEDINA reintroduced the idea of the attack. He asked the CHS if he "felt" what he was saying. MEDINA continued, "Because right now man, I'm up for it. I really am. I wanna get away with it. But I wanna, I wanna see it make the news and everybody." MEDINA then commented that the news coverage could galvanize Muslims to worldwide action: "I wanna see it go worldwide with now all the Muslims realizing you know, when it's our time...Next thing you know it will be in California, Washington, and the brothers are saying you know, it's our time now." MEDINA then discussed placing the bomb in the parking lot of the synagogue, and added, "[W]e can just lay one out there and then bomb it later...I'd like to put it like, as close as possible, to the door." MEDINA also expressed a concern for concealing his tracks and proposed "to run in and out real quick, like if you just park the car, I'm gonna just go in there real quick." The CHS and MEDINA then discussed a proposal from the CHS to hide the bomb under a large jacket and then leave the bomb in one of

the synagogue's bathrooms. Regardless of these operational details, MEDINA expressed his desire to cause harm: "I mean though, whatever, whatever it is, it's just gonna go off. I wanna see damage happen to their ass. I wanna see something man." The CHS and MEDINA then concluded the meeting by agreeing to meet on Saturday, April 16, 2016. The CHS offered to call the purported explosives associate and MEDINA agreed, stating "Let's see if we can set up some kind detonate man."

15. On April 16, 2016, the CHS met with MEDINA. The two traveled to the target location in Aventura, Florida, to further develop the attack plan, which would involve the CHS dropping MEDINA off at the synagogue to place the explosive device. They first conducted surveillance of the entire perimeter of the target location on foot, identifying the location of security cameras as well as the functions of each building within the Jewish community center. MEDINA envisioned a terrorist operation that would inflict maximum casualties, commenting "Cause, uh, I'm sure this is gonna be hammered. All these people gonna die." He provided detailed instructions to the CHS about how to drop him off and then pick him up after the bomb had been strategically placed, at one point commenting, "Over here I'm sure there's cameras but we haven't spotted it yet. What I want you to do is I want you to drive this way..." MEDINA offered the CHS detailed driving instructions, apparently to evade detection: "Don't go all the way over there 'cause there's [UI]. So you're gonna go this way, you're gonna make the U-turn, you're gonna come back up. Make a three-point turn." MEDINA indicated the location where he wanted to be picked up, telling the CHS "you pick me up right there and we're gone."

16. At the end of this part of the conversation, the CHS reiterated that MEDINA would have the cellular telephone and the backpack as needed items for the bombing operation. The CHS referenced the purported explosives associate and stated that he would secure these

items through him (“through the guy I’ll get this shit”) and noted that the associate would probably want to be there for the attack. MEDINA again recounted the operational plan, with emphasis on the fact that it should be when the synagogue is full of people: “[Y]ou just let me in there real quick, and I find my opportunity to walk in while the service already started...When I see, uh, I find the clearance, it’s where you’re gonna tell me, okay now, pull up and drop me off.” MEDINA flatly told the CHS, “Oh my God, I can’t wait.”

17. Following the walk around the center, MEDINA and the CHS created a sketch of the synagogue buildings and grounds and made note of various security features. The CHS explained to MEDINA that this information would need to be communicated to his associate, and MEDINA approved of sharing his plan and its details. MEDINA stated, “This is it, this is our plan dog.” The CHS predicted that “this is gonna be, this is gonna be like, like fuckin’ September eleven shit!” This was a reference to the terrorist attacks on September 11, 2001. MEDINA added that it would be “the call back. A wake up call.” At the end of their surveillance of the target location, the CHS sought to gauge MEDINA’s commitment to the bombing operation, stating, “Ok. Alright man. You comfortable with it?” MEDINA replied, “Definitely.” MEDINA again went through the plan for the CHS to drop him off in front of the synagogue and drive away. MEDINA was careful to instruct the CHS that they had to wait for “the right moment” and affirmed that this was all “for a good cause.” Both agreed that, in MEDINA’s words, “That’s a good plot right there.”

18. MEDINA first wanted to place the bomb inside the synagogue building, and speculated whether he should leave it in a restroom, adding “I just, I just, I gotta plan it out.” The CHS cautioned that they should plant the bomb outside the building instead “while they’re inside the service” and then drive away. This was a reference to timing the attack while the

congregation was inside the building. MEDINA wanted to witness the explosion, hearing and feeling the blast from the nearby car: “I wanna see that shit go off...For real. I wanna hear that shit. I’ll have the windows down...” Toward the end of the conversation, MEDINA again expressed his enthusiasm, “Yo, that sounds awesome bro! I’m down, I’m down, I’m up for it, big time! Big time!” MEDINA also sought to motivate the CHS, adding “Let’s make it happen bro!” In addition to the audio recordings of the conversations, these events were corroborated by FBI surveillance. Moreover, the CHS provided the FBI with the original sketch of the target location, which will be entered into evidence.

19. On April 20, 2016, the CHS and an FBI employee operating in an undercover capacity (“UCE”) met with MEDINA in the UCE’s vehicle. The UCE was posing as the acquaintance of the CHS who was an associate with explosives expertise and access. While driving to get something to eat, MEDINA told a story about a Jewish woman he had met earlier who had given him a ride. A discussion had ensued regarding her fear of Muslims once she realized MEDINA was a Muslim and her thoughts that MEDINA might kill her. Thereafter, MEDINA remarked to the UCE and the CHS that he had told her, “[Y]ou know, we’re, we’re just getting bombed for no reason, and it was time to get out. But it made me just think more that, you know, it just, when she said that you will kill me, I’m thinking yeah man, I want to. You know what I mean? I really do...”

20. Later, while in the car with the UCE, MEDINA reaffirmed his desire to commit the synagogue attack. The UCE sought to test MEDINA’s interest in the bombing and cautioned him that he did not have to go through with it. The UCE asked, “Why do you wanna do this?” MEDINA responded, “Because I realize that I have a lot of love for Allah. And I know that all these, all these wars that are going on, it hurts me, too. You know? It’s my call of duty. I gotta

get back, when I'm doing this, I feel that I'm doing it for a good cause for Allah." Later in the conversation, the UCE again asked, "So anyway, so why you wanna do this?...I'm not sure what you want from me." MEDINA talked around the point, but made clear that he wanted the UCE to provide the explosives: "Well, what I'm thinking is, you get, you may, you may have access to all of that... You know, and that's that's pretty much where you're coming in, then we're getting it from you." A third time, the UCE asked MEDINA about his motivation, "Why do you want to do this?" MEDINA then responded, "I'm thinking of doing it on the day of the Yom Kippur," and explained that if he could not get inside the synagogue, then he wanted to place the bomb outside the building, "where it can at least go off somewhere. You know what I mean? At least show that, you know, we're striking."

21. MEDINA's comments prompted the UCE to ask another question about his motivation, "What message are you sending?" The UCE wanted to know more about MEDINA's purpose in attacking the synagogue, including what claim of responsibility would be made. MEDINA answered that "I'm gonna call that it's ISIS in America." MEDINA plainly told the UCE that "I do want to get the bomb," and though he had considered using an AK-47 assault rifle to "just go in there and rampage everybody," he concluded, "Well I'd like to use the bomb." MEDINA added, "And I'm hoping that that one bomb can just cause a big damage you know? And let them realize that their Yom Kippur's going down." MEDINA sought to reassure the UCE that the operation would be a success: "Believe me, I can make it so easily." MEDINA explained to the UCE that the CHS would drive him to the target, drop him off, and then he would place the bomb next to the synagogue door.

22. After MEDINA described the attack plan, the UCE for a fourth time sought to question him about his resolve, "You're sure this is something you want to do man?" MEDINA

responded, "I feel like it's my calling." The UCE pressed MEDINA further, "Well I don't want you to be crazy. You're gonna have to go into this with both eyes open. You understand what I'm saying?" MEDINA responded that it is Allah's will and that he's not crazy and reckless to the point where he would get the UCE arrested: "No I'm not like that." The UCE cautioned MEDINA one more time that "once you do this, there's no going back." MEDINA reiterated his plan to personally deposit the bomb, and after it detonated, enjoy watching the news coverage of the attack: "That we, they, whatever they're sayin', that they're being bombed and all of that..., and knowing that it was from us. And just getting' a joy that I'm doing this you know, I did it. It worked out. And whatever happens, it's for the glory of Allah." MEDINA further explained his hope to credit "ISIS" for the attack: "I do wanna like leave a notice that ISIS is like you know, here. If there's somehow we can just like leave a printer or something, or something that's saying that, so at least they, they can show it on Television look, they're leaving this that ISIS is here. You know?"

23. After another lengthy explanation of the attack plan, in which MEDINA would exit the car and place the bomb near the synagogue door, the UCE once again explained the seriousness of what MEDINA was planning: "Now you know there's gonna be women and kids and everything else in that place." MEDINA at first seemed to interpret the UCE's comments as a risk to himself: "And that's the thing, I gotta play it right where we're not gonna be you know, being seen. It's just a drop off." But the UCE further pressed MEDINA on his willingness to kill innocent people: "No, I understand that, but when you put a bomb in a place like this, are you okay, you've made peace with Allah that you're fine with killing women and children and everything else." The following exchange then took place:

JM: I think so. I think I'm fine, Um hmm.
UCE: You need to be sure brother.
JM: I am pretty sure. I think so. I believe so. I'm ready bro!
UCE: Ok. Cause you know you don't have to do any of this.
JM: What do you mean doing it?
UCE: No, you don't have to do it if you're not comfortable with it.
JM: What? I'm ready.
UCE: It's Allah's will but you know...,
JM: I'm up for it. I really am. This is no joke. This is serious dog. If I have the equipment, believe me, in the time is, is that day and we doin' it, I'm up for it bro. Just like I said. I mean, if I go inside and drop it off, that's gon, that's gonna be risky. You know,
UCE: Yeah, yeah.
JM: I think it's better that I just, we just pull up to the car, put it like on the side, in the un, under, in the front, and then just get back in an leave. And that's it. That car's gonna blow up. And that's gonna blow the one beside it and one and everybody inside, it's gonna cause chaos.

24. One final time during this meeting the UCE attempted to gauge MEDINA's seriousness of purpose. Toward the end of their conversation, MEDINA once again stated, "I'm up for it." The UCE responded, "Man, this is something you really need to think about man...I want you to think about it brother." MEDINA did not dwell on the UCE's question but turned the conversation to the symbolism of a Yom Kippur attack: "[B]elieve me, if it can happen on uh the time of Yom Kippur, my, my, you, it's like it's working out. Because this has to be the plan." The UCE interrupted, "Yeah, but you don't..." MEDINA continued, "And right now we're planning it out where right I'm looking at it for that day. For that time of Yom Kippur." When asked what materials he would provide for the device, MEDINA then told the UCE that he could provide a bag if necessary to conceal the device.

25. On April 21, 2016, MEDINA, the UCE, and the CHS again met and MEDINA provided the UCE with a laptop-style computer bag to conceal the device and offered his cellular telephone for use in the device to trigger the detonation. The group discussed many of the same topics from the prior meeting, to include whether MEDINA was comfortable with killing

innocent women and children. MEDINA did not waiver and stated that he was ready. When asked to re-sketch the target location, MEDINA did so during the meeting, highlighting important mission-critical items, such as camera locations, entry and exit points, parking lots, and access roads. MEDINA also provided the UCE with a leaflet he had created for copying that contained a photo of the "ISIS" flag and the words "ISIS in America." Ultimately, MEDINA and the UCE decided that the attack would take place on Friday, April 29, 2016.

26. On April 29, 2016, the UCE met with MEDINA in a parking lot in Hallandale Beach, Florida. MEDINA took possession of what was described as, and what he believed to be, an explosive device. Unbeknownst to MEDINA, the device was inert and posed no danger to the public. At this time, MEDINA was briefed on the operation of the device and given instructions regarding its use. Thereafter, MEDINA and the UCE drove toward the target location in Aventura, Florida. After MEDINA exited the vehicle with what he believed to be an explosive device in hand, with the intention of placing and detonating it near the Jewish center/synagogue, he was taken into custody as he approached the target location.

27. Prior to his meeting with the UCE, MEDINA made three videos on the CHS' cellular telephone. In one, he stated: "I am a Muslim and I don't like what is going on in this world. I'm going to handle business here in America. Aventura, watch your back. ISIS is in the house." In another, he stated: "Today is gonna be a day where Muslims attack America. I'm going to set a bomb in Aventura." In the third, he said his goodbyes to his family.

28. After his arrest, MEDINA, in a post-Miranda statement, admitted to attempting to place an explosive device at the Jewish center/synagogue. He stated that his motivation was to strike back for all the wars and his goal was to send a message. He stated that he obtained an

explosive device and he planned to put it near a car in the parking lot. When asked whether he knew that if the attack succeeded, that people may have died, he responded “whatever happens.”

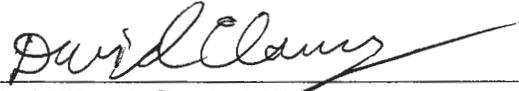
29. After the arrest of MEDINA, BH and TI were approached by agents. They each were cooperative and agreed to be interviewed. Each stated that they had heard MEDINA discuss his plans to conduct an attack. However, neither BH nor TI intended to participate with MEDINA.

30. MEDINA’s target, the Jewish center/synagogue, includes congregants and visitors from all over the United States and foreign countries and is located on a busy thoroughfare in Aventura, Florida, close to a large shopping mall and other businesses, such that an explosives attack of the type contemplated by MEDINA, if successful, would have affected interstate and foreign commerce.

CONCLUSION

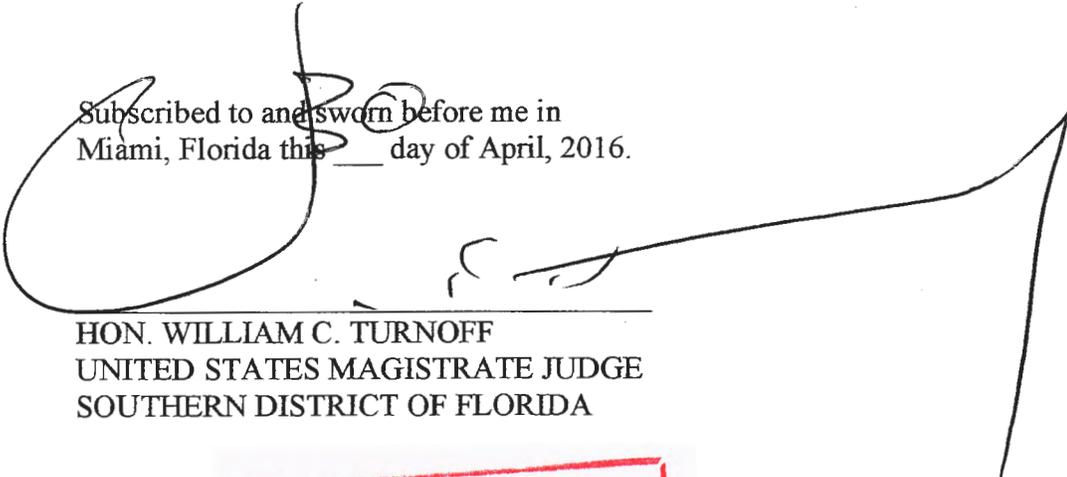
31. Based on the foregoing facts, your affiant respectfully submits that there is probable cause to believe that JAMES GONZALO MEDINA, did knowingly attempt to use a weapon of mass destruction against a person or property within the United States, where the offense or the results of the offense would have affected interstate or foreign commerce, in violation of Title 18, United States Code, Section 2332a(a)(2).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



DAVID H. CLANCY
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Subscribed to and sworn before me in
Miami, Florida this ___ day of April, 2016.



HON. WILLIAM C. TURNOFF
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA

Certified to be a true and
correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By SL2116 Deputy Clerk
Date _____