

Approved:   
SAM ADELSBERG / SIDHARDHA KAMARAJU / MATTHEW HELLMAN
Assistant United States Attorneys

Before: THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

21 MAG 639

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UNITED STATES OF AMERICA		:	SEALED
		:	<u>COMPLAINT</u>
		:	
- v. -		:	Violations of
		:	18 U.S.C. §§ 2339B,
COLE JAMES BRIDGES,		:	1114, and 2
a/k/a "Cole Gonzales,"		:	
		:	COUNTY OF OFFENSE:
Defendant.		:	NEW YORK
		:	
		:	
-----	X		

SOUTHERN DISTRICT OF NEW YORK, ss.:

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

COUNT ONE

(Attempted Provision of Material Support to a Designated Foreign Terrorist Organization)

1. From at least in or about August 2020, up to and including in or about January 2021, in the Southern District of New York and elsewhere, COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant, knowingly attempted to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Complaint, including, among other things, training, services, and personnel, knowing that ISIS was a designated foreign terrorist organization

(as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B and 2.)

COUNT TWO

(Attempted Murder of U.S. Military Service Members)

2. From at least in or about August 2020, up to and including in or about January 2021, in the Southern District of New York and elsewhere, COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant, knowingly and willfully attempted to kill an officer and employee of the United States -- which killing is murder as defined in Title 18, United States Code, Section 1111(a) -- including any member of the uniformed services, while such officer and employee was engaged in and on account of the performance of official duties, and any person assisting such an officer and employee in the performance of such duties and on account of that assistance, to wit, BRIDGES attempted to provide military tactical training and advice to ISIS to facilitate the efforts of ISIS fighters to repel U.S. Special Forces and kill American soldiers.

(Title 18, United States Code, Sections 1114 and 2.)

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

3. I am a Special Agent with the FBI, currently assigned to the New York Joint Terrorism Task Force. I have been personally involved in the investigation of this matter, and I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

4. COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant, is a Private in the U.S. Army assigned as a cavalry scout in the 3rd Infantry Division based in Fort Stewart, Georgia. As detailed below, BRIDGES is a supporter of ISIS and its mission to establish a global caliphate, and he attempted to provide military tactical training and advice to ISIS to facilitate the efforts of ISIS fighters to repel U.S. Special Forces and kill American soldiers. Since fall 2020, over the course of encrypted communications with an undercover FBI employee and confidential source posing as fellow ISIS adherents in direct contact with ISIS fighters in Syria, BRIDGES has—while deployed with his U.S. Army unit overseas and continuing after returning with his unit to the United States—expressed his allegiance to ISIS and its radical jihadist ideology, see infra ¶¶ 10(a)-(d); provided advice regarding choosing targets in New York City for a potential ISIS attack, see infra ¶ 10(q); stated that if his Army unit was involved in combat with ISIS fighters, he would betray his unit and join the ISIS fighters, see infra ¶ 10(i); provided support, tactical training materials, and advice for use by ISIS against American forces, including a clip from a combat training video, images of pages from a U.S. Army field manual regarding troop movements and combat tactics, and diagrams that BRIDGES created demonstrating specific tactical maneuvers and strategy that ISIS should employ against U.S. forces, including rigging a compound with explosives for detonating when U.S. soldiers entered, see infra ¶¶ 10(l)-(t); and created a video for use by ISIS as propaganda, in which BRIDGES appears in front of a jihadist flag, wearing body armor and speaking through a voice changer, and makes statements celebrating the anticipated ISIS attack on U.S. soldiers that BRIDGES attempted to facilitate, see infra ¶ 10(t).

The Islamic State of Iraq and al-Sham

5. On or about October 15, 2004, the United States Secretary of State designated al Qaeda in Iraq ("AQI"), then known as Jam' at al Tawid wa' al-Jahid, as a Foreign Terrorist Organization ("FTO") under Section 219 of the INA and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary of State also added the following aliases to the FTO listing: The

Islamic State of Iraq and al-Sham ("ISIS"—which is how the FTO will be referenced herein), The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

6. Based on my participation in this investigation and my review of open-source reporting, I know, among other things, that on or about September 21, 2014, then-ISIS spokesperson Abu Muhammad al-Adnani ("Adnani") issued a recorded statement calling for attacks against citizens—civilian or military—of the countries participating in the United States-led coalition against ISIS. Adnani specifically called for suicide bombings, shootings, and vehicle attacks.

7. ISIS members and associates make and have made public statements and issued public declarations, which, among other things, (a) proclaimed and acknowledged that acts of violence had been committed by ISIS; (b) threatened future acts of violence if ISIS's demands were not met; and (c) were intended to promote and foster the prestige and standing of ISIS. ISIS has claimed responsibility for the following terrorist attacks, among others: (i) on or about November 13 and 14, 2015, a group of attackers carried out attacks in Paris, France, which killed approximately 130 people; (ii) on or about March 22, 2016, a group of attackers carried out bombings in Brussels, Belgium, which killed at least 32 people; and (iii) on or about July 14, 2016, an attacker used a truck to run over civilians in Nice, France, killing more than 80 people and injuring more than 300.

8. To gain supporters, ISIS, like many other terrorist organizations, spreads its message using social media, Internet platforms, and email. Using these platforms, ISIS has disseminated a wide variety of recruiting materials and propaganda through social media, which includes photographs and videos depicting ISIS activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS and members of other Islamic extremist organizations.

9. Among other Internet and social media platforms, ISIS has popularized the use of end-to-end encrypted communication services and applications as a means of recruiting, communicating with, and disseminating terrorist training materials and propaganda to its members and supporters. ISIS members and supporters use various applications to communicate.

BRIDGES Expresses Support for Jihad

10. Based on my participation in this investigation, including my conversations with other law enforcement officers and military personnel, my review of reports written by other law enforcement officers and military personnel, including an FBI online covert employee (the "OCE"), my review of screenshots of the messages described below, my review of data obtained from judicially authorized warrants, and my review of open-source materials, I have learned, among other things, the following:

a. Since in or about September 2019, COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant, has been a member of the U.S. Army. The military records and social media posts discussed below reflect that BRIDGES also uses the name "Cole Gonzales." BRIDGES is a Private assigned as a cavalry scout in the 3rd Infantry Division based in Fort Stewart, Georgia. From at least approximately September 2020 until late-November 2020, BRIDGES was deployed with his unit to a U.S. Army base located in Germany.

b. Based on my review of data obtained pursuant to a judicially authorized search warrant for an online account used by BRIDGES ("BRIDGES Account-1"), I have learned, among other things, the following:

i. On or about December 25, 2019, BRIDGES searched for the following terms: "us soldier shooting," "ak 47 downsize," and "badass jihadi."

ii. On or about August 12, 2020, BRIDGES searched for the phrase: "Suicide in Islam."

iii. On or about August 19, 2020, BRIDGES searched for the phrase: "Green Beret Ambush."

c. BRIDGES maintains an account ("BRIDGES Account-2") on a social media platform. BRIDGES has posted, among other things, the following on BRIDGES Account-2:

i. As of on or about August 13, 2020, BRIDGES Account-2 bore the profile picture and background depicted below, among others:



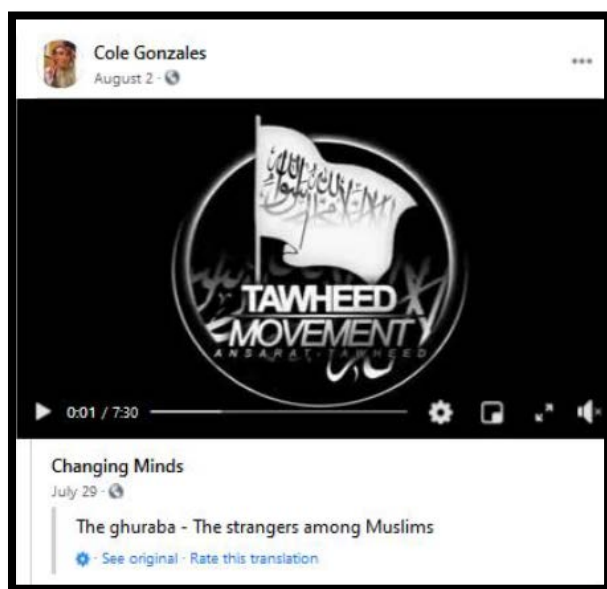
ii. The background image of the BRIDGES Account-2 profile picture shown above appears to be the same as an image posted on BRIDGES Account-2 on or about August 17, 2020, which is depicted below:



Based on my training, experience, and involvement in this investigation, I believe that the reference to "Shaam" in the text accompanying the image is a reference to a region in the Middle

East, which is also known as Greater Syria or the Levant, and which ISIS has purported to rightfully control.¹ Furthermore, the text is attributed to Shayk Sulayman Ibn Nasir Al-Alwan, a prominent Salafist scholar and proponent of militant jihad, including jihad in Syria and for the Taliban and al Qaeda. For example, one of Al-Alwan's students was Abdulaziz al-Omari, who was one of five hijackers on American Airlines Flight 11 during the September 11, 2001 terrorist attacks on the United States. Al-Alwan has been imprisoned in Saudi Arabia almost continuously since in or about 2004 and has been convicted of, among other things, financing former al Qaeda leader Abu Musab al-Zarqawi.

iii. On or about August 2, 2020, BRIDGES posted a video to BRIDGES Account-2 titled "Changing Minds - The ghuraba - The strangers among Muslims." The title image of the video included a white flag against a black background with Arabic writing and the title "Tawheed Movement," as depicted below:



Based on my training, experience, and involvement in this investigation and others, I know that "tawheed" or "tawhid" encapsulates the concept of monotheism within Islam and is frequently invoked by members and associates of ISIS. For example, ISIS militants often display a single raised index finger as a symbol of ISIS and its goal of a single worldwide caliphate.

¹ All statements referenced in this affidavit are described in sum and substance. Furthermore, all typographical, grammatical, or spelling errors in the original statements have been reproduced here.

Additionally, the flag depicted in the video appears to be an inversion of a black flag with white Arabic text, also known as "al-roya," which has been widely adopted by jihadists, including by ISIS.

d. BRIDGES also used an account ("BRIDGES Account-3") on an encrypted messaging application ("Messaging Application-1") to communicate with, among others, the OCE. In or about October 2020, BRIDGES changed the profile photograph associated with BRIDGES Account-3, so that it matched the profile photograph for BRIDGES Account-2 depicted above. Based on my review of open-source material, I have learned that, prior to the change, BRIDGES used the following image as a profile photograph for BRIDGES Account-3:



Based on my training, experience, and involvement in this investigation, I believe the photo depicts a seated individual wearing camouflage pants and combat boots, with what appears to be an M4 rifle, which is a rifle widely used in the U.S. Army. Translated roughly into English, the Arabic text reads, "Oh Allah, I ask for martyrdom for your sake. . . . Ameen, oh God of the world."² Within the text are also two small images, or emojis, which are (1) a hand with the index finger pointed upward and (2) a black flag, both of which are symbols used by ISIS.

BRIDGES Agrees to Provide Advice and Training to ISIS Fighters

e. In or about September 2020, the OCE, posing as a female ISIS supporter, asked BRIDGES why he had removed another contact from BRIDGES's contact list. BRIDGES responded:

² All translations described in this affidavit are preliminary, and subject to change based on additional investigation.

[H]e makes it sound like getting out of the military is very simple. But I wish it was as simple as he makes it seem, once someone signs that contract they basically signed their life away for the amount of years because they couldn't find anything else in the civilian world. I used to have connections with people in Hamas and Isis, and my family found out and the government could have arrested me. So I needed to prove to them I wasn't what they thought I was, and I needed the government to get off my back. I don't tell people I'm in the military, and I hate displaying the US flag on my shoulder.

f. On or about October 8, 2020, the OCE asked BRIDGES how he managed to join the military given his contacts with ISIS, to which BRIDGES responded, "Mm nobody knew I had contacts besides my family but it was never confirmed. They were suspicious. Even still because I had homeland security show up to my work before the army. And today this Investigation department came to the camp." BRIDGES then noted, "I mean I have my flag, Ar rayat" and sent the photograph depicted below to the OCE:



Based on my training, experience, and involvement in this investigation, I believe the flag depicted in the photograph BRIDGES sent is a banner used by jihadists, including ISIS.

g. Later in that same conversation on or about October 8, 2020, the OCE asked BRIDGES how his family had discovered his support of jihadist causes, and BRIDGES replied, "I had a page online for posting videos and photos." BRIDGES then wrote "For example" and posted several images, including the images depicted below:





Based on my training, experience, and involvement in this investigation, I believe the images and text above include ISIS propaganda and material supportive of ISIS and its cause. For example, I believe the above images were taken in part from images previously published in "Al-Naba," an official weekly publication produced by ISIS.

h. Later in that same conversation on or about October 8, 2020, BRIDGES notified the OCE that he had added the OCE to his contacts list in Messaging Application-1 so that they could communicate via BRIDGES Account-3. BRIDGES then wrote the following to the OCE:

The brothers who have been fighting to establish a khilafah have inspired me a lot, they're love for Allah and courage to go against all of this world to raise His word to the highest. And yet I sit here, so I understand your frustration with not being able to do more and feeling like you are useless. But . . . you are not, to be a lion

or lioness doesn't mean you always have to fight . . . there are ways other than fighting that are considered a form of Jihad even within yourself.

Based on my training, experience, and involvement in this investigation, I believe that in this message BRIDGES was expressing support for ISIS's goal of establishing a "khilafah" or caliphate, which I understand refers to a worldwide Islamic state.

i. On or about October 10, 2020, the OCE asked what BRIDGES would do if BRIDGES and his unit were confronted in combat by one or more ISIS fighters. BRIDGES replied, in part, "I would probably go with the brothers," which I believe, based on my training and experience, was a reference to the ISIS fighters.

j. On or about October 16, 2020, BRIDGES wrote to the OCE that he was trained for combat and had "skills not everyone else has." The OCE then asked if BRIDGES had thought about sharing his knowledge with the "brothers," referring to ISIS members and supporters. BRIDGES replied, "Of course I have . . . I can teach them ways of fighting, combat techniques, movements, formations, etc. React to contact." BRIDGES elaborated, "So like what to do when you start to get shot at." BRIDGES then explained, "I'm a cavalry scout . . . so I work with infantry sometimes . . . they used to ride horses but now we just use Light tanks or Humvees . . . [cavalry scouts] do a little bit of everything." After the OCE conveyed there were brothers who could use the training and skills BRIDGES had, BRIDGES replied, "Yeah that is where it gets hard because book knowledge can only do so much good. It is when you apply it to physical training is when it works. Repetition and muscle memory plays a big role in it too. And rehearsing scenarios. So then skills become like a second instinct."

k. Later in the same conversation on October 16, 2020, the OCE wrote to BRIDGES that the "brothers" that the OCE knew, including the OCE's own brother, whom the OCE had informed BRIDGES was living in New York City, wanted to train for an operation, and asked if BRIDGES had any training videos that would be helpful. BRIDGES replied, "Personally no, not of myself training. But I have some videos online." BRIDGES then asked, "What kind of operation? If your brother is in the US, he needs to be careful." The OCE suggested they could speak using Messaging Application-1, and BRIDGES replied, "I have no problem with that We have civilian investigators that came by last week taking random people

for 'interviews', luckily I wasn't picked. Just message me on [Messaging Application-1]."

l. Later on October 16, 2020, BRIDGES sent the OCE the following message on Messaging Application-1:

But if your brother and the other brothers are planning an operation, depending on if it is an attack or something against the kuffar. They need to be extremely careful and not to discuss plans over the phone or through messages. Sadly I can't participate. But the only involvement I can do is advice and training techniques . . . your brother can feel free to contact me anytime.

BRIDGES then described what he was prepared to offer to ISIS: "Just advice on combat and different tactics. [Your brother] is an American and has been in the army so I have no doubt he knows how the government works." BRIDGES then sent a clip of a combat training video, and wrote:

I work in a small 4 man team and we train like this exactly. In this video these guys are doing the basic but there are many ways when it comes to reacting to contact and eliminating the enemy. These guys in the beginning call out contact and quickly get down and try to gain fire superiority, as one covers the other one moves closer to the target and then calls the other guy down. You have to shoot, move, and communicate when pushing on your objective.

Based on my training, experience, and involvement in this investigation, I believe BRIDGES was explaining to the OCE the type of combat training he could provide to ISIS members.

m. Later in the same conversation on October 16, 2020, the OCE discussed introducing BRIDGES to the OCE's purported brother, whom the OCE had previously described as a New York City-based ISIS supporter who was a U.S. military veteran. The OCE further explained that the OCE's brother had contacts with ISIS operatives and would be interested in the training that BRIDGES had offered to provide. Based on BRIDGES's above-described reference to connections with Hamas, the OCE asked BRIDGES if BRIDGES's support for Hamas would pose any problem, as the OCE's

brother and his associates support ISIS but not Hamas. BRIDGES replied:

Haha It wont make me uncomfortable I never supported Hamas fully, I supported their fight against the [Israel Defense Forces]. And Isis they did too much innocent killing, and in my opinion died like cowards. Especially the suicide bombings, it doesnt make one a martyr, it is still classified as suicide. And like in Raqqa, they used to have killing rooms and then pile the bodies up in there. I agree with their efforts to establish a khilafah and their way of structuring it and making a system.

Based on my training, experience, and involvement in this investigation, I believe that in these messages BRIDGES explained to the OCE that while BRIDGES is opposed to certain methods used by ISIS, including suicide attacks, he supports ISIS and its mission to establish a global caliphate ("establish a khilafah") ruled by ISIS's systems of organization and governance.

n. Also on or about October 17, 2020, BRIDGES provided the OCE with an account ("BRIDGES Account-4") on another encrypted messaging application ("Messaging Application-2"), and wrote that the OCE should communicate with BRIDGES at that account. Based on my training, experience, and involvement in this and other investigations, I know that Messaging Application-2 is frequently used by ISIS members, and that ISIS encourages its use.

o. On or about October 20, 2020, the OCE, posing as the OCE's brother, sent BRIDGES a message at BRIDGES Account-4 introducing himself. On or about October 22, 2020, the OCE asked BRIDGES, "How would you best be able to do this [brother]? If you could help the Ummah with these skills, how would you?" BRIDGES responded "Well, videos possibly, writing a type of manual," and then wrote "Someday inshallah ta'ala actually being able to physically teach brothers of the ummah that want to fight."

p. Based on my review of the BRIDGES Account-1, I have learned that between on or about October 21 and November 2, 2020, BRIDGES searched and viewed the results for the following search terms: "Isis nasheed," "Ummat al Islam BushraAbu Malik," "Isis ideology," "Faking on joining the army," "Abu Ali- Say to the Aggressor (Nasheed)," "How to Fake Your Own Death," and "Captured U.S. Soldier on Tape." Based on my training, experience, and

involvement in this investigation, I know that the Youtube videos "Ummat al Islam BushraAbu Malik" and "Abu Ali- Say to the Aggressor (Nasheed)" appear to be jihadist propaganda videos. I also know that the YouTube video "Captured U.S. Soldier on Tape" relates to Bowe Bergdahl, a former U.S. Army soldier who was convicted in a court-martial proceeding for deserting his unit while stationed in Afghanistan.

q. The OCE continued to pose as the "brother" persona to communicate with BRIDGES, and they engaged in communications over Messaging Application-2, including the following:

i. On or about October 26, 2020, the OCE sent BRIDGES the following message: "As I told you before, there is a group of brothers I work with. They are in need of training, as well as someone who is knowledgeable in reconnaissance. We work together on [Messaging Application-2] while observing operational security practices."

ii. On or about October 28, 2020, the OCE sent BRIDGES a message stating, "we have brothers in both Paris and the U.S. . . . we believe that the US and the French are inextricably linked . . . one supports the other and they both have a common enemy: us." BRIDGES responded, "Well yes of course, the US is the main one in the world that has a grip on the muslim world and main establisher of democracy." After the OCE expressed that there had been multiple ISIS attacks in France in which the attackers had died needlessly, BRIDGES responded "I agree, because a knife attack isnt going to do damage. The targets are those that are in power, not civilians The targets are those that enforce the power by the kuffar government. Enforce the rules." The OCE then asked BRIDGES, "what do you think is the most effective way to conduct an attack," to which BRIDGES responded, "Striking the heart of the enemy, and setting a statement and a clear message to the leaders."

iii. Following that message, the OCE created a group chat on Messaging Application-2 including the OCE, BRIDGES, and an account used by an FBI confidential source (the "CS") posing as a France-based ISIS supporter.³ On or about November 12, 2020, BRIDGES sent the CS a message in which he wrote, "I have a book that I could send photos" and "a lot of it is working with who you

³The CS is assisting the FBI in exchange for financial compensation and does not have any criminal history. Information provided by the CS has been partially corroborated by independent evidence, including, among other things, electronic communications.

will be fighting along side with. So you can build that repetition and muscle memory." After the CS asked BRIDGES to send the material, BRIDGES sent several photographs of pages from what appears to be a U.S. Army field manual (the "Field Manual"). The images of the Field Manual contained, among other things, steps for troop movements and military operational details. After sending the images, BRIDGES began to advise the CS about operational details. For example, BRIDGES wrote:

Another scenario, if brothers are in contact with enemy combatants and it is a overwhelming force you need to "break contact," dont just simply get up and run away. You have to keep firing at the enemy and keep suppressing and bounding back gradually depending on how many are on your squad.

BRIDGES then sent diagrams on combat tactics and continued to provide advice, including about how ISIS fighters could use a "bottleneck" tactic to create a "kill zone." BRIDGES explained:

[T]here is multiple ways to do this, Ill have to draw one out of that my squad uses called a "bottleneck" where we basically can form a kill zone and move the enemy to where we want them. Because, bullets move people, so when done right you can move them to where you want them.

iv. On or about November 13, 2020, the OCE wrote the following to BRIDGES: "We know that without [training] our mission won't succeed, and as we've sworn bay'at to Dawlah, we want to ensure to progress the Caliphate." Based on my training, experience, and involvement in this and other investigations, I know that "Dawlah" is used by ISIS supporters as another name for ISIS. The OCE also sent a message to BRIDGES and the CS stating that the CS had sent to the OCE the "training materials" that BRIDGES had previously provided to the CS, and that "[t]his is exactly the time of specific tactical training we and the brothers need." The CS responded, "yes it will be very helpful inshallah!" BRIDGES, the OCE, and the CS then discussed details of a potential ISIS attack on U.S. military personnel. BRIDGES asked, "how many brothers would be participating in the attack?" The OCE replied, "there will be two attacks," and then asked the CS, "how many in yours?" BRIDGES responded by asking "any weapons? Ammo count. Body armor." The OCE replied, "I have 4 brothers and yes to weapons." BRIDGES then asked "two?" The CS then stated, "4 or 5.

We are still working on the logistics. We still cannot agree on some stuff. But I think with the materials you gave us, we can work things out." The OCE added, "4 AR-15s, 4 handguns, a shotgun, and a Remington 700 SPS Tactical. I am still trying to recruit someone with sniping skills." BRIDGES then asked the CS, "how about you," to which the CS replied, "I think we have enough recruits for now. They all have different skills but need to work on improving them for sure. That's why I asked for your help." BRIDGES then stated:

What weapons do you have? Trying to put logistics together because depending on the ammo count you'll have to distribute it evenly. Because if you want these attacks to succeed, you'll have to plan every last bit of detail and have multiple back up plans and avoid all costs of being captured.

Later in the exchange, BRIDGES advised the CS and the OCE to destroy their cellphones once the purported attacks commenced, and BRIDGES offered to come to New York to visit the OCE sometime after BRIDGES returned to the United States. The CS also asked, "do you want us to relay a message for you," referring to relaying a message from BRIDGES to ISIS, and BRIDGES responded "may Allah وتعالى سبحانه [Glory be to Him] help us establish a Khilafah, and grant us victory against the kuffar, Inshallah [exalted is He]."

v. On or about November 13, 2020, the OCE sent a message to BRIDGES, stating "I tried to work a little of your cav scout magic." The OCE, who was in New York, New York, then sent BRIDGES a series of photographs of federal, local, and foreign government buildings in and around New York City. In connection with these messages, the OCE also stated, "Everything is so heavily guarded, I don't know that it's even possible to do an operation in NYC," to which BRIDGES responded "choose your targets wisely," and asked the OCE if the OCE would be able to participate in a call with BRIDGES. The OCE agreed to have the call later and then stated, "I also went a few other places I will send you those oo." After BRIDGES asked which other places, the OCE identified other government buildings in New York City. In response, BRIDGES commented "not enough firepower for that." The OCE and BRIDGES further discussed a potential attack at the 9/11 Memorial. BRIDGES initially stated that he believed that the 9/11 attacks were murder. The OCE replied, "Yes I was thinking of when the diplomats came though, the heads of state." BRIDGES then wrote "a key target" and "that could honestly be a sniper kill and then getting out quietly for a second attack."

vi. On or about November 17, 2020, the OCE sent a message to BRIDGES, stating "I spoke to the brother in Dawlah, I will send you our convo." The OCE then sent BRIDGES a screenshot of a purported message exchange between the OCE and the "brother in Dawlah." The screenshot reflects that the OCE shared with the ISIS "brother" a screenshot from the Field Manual that BRIDGES had sent to the CS, see supra ¶ 10(q), and relayed to the purported brother in ISIS some of the combat tactical advice that BRIDGES had previously provided to the CS, stating that "he [i.e., BRIDGES] said that if you and the brothers are fighting and it is against too strong of a force and you need to retreat you have to 'break contact,' which means you don't get up and run away, but keep firing at the enemy and suppressing and bounding back gradually." The OCE further stated, "he [i.e., BRIDGES] also mentioned a thing that his squad uses called a 'bottleneck' where they form a kill zone and move the enemy to where they want them. He said that because bullets move people, so if done right the brothers could move them to where they want them." The "brother" responded "what this means bottleneck??" BRIDGES then stated to the OCE "Mashallah Ill draw out a bottleneck haha." The OCE then asked that BRIDGES get a new cellphone to communicate with the OCE once BRIDGES returned to the United States, which BRIDGES agreed to do. BRIDGES also stated that he was going to discard the phone that he had been using. When the OCE asked whether this was to "get[] rid of the evidence," BRIDGES replied, "Mm yes."

r. On or about November 28, 2020, BRIDGES traveled from Germany to the United States as part of his unit's scheduled return from its overseas deployment.

s. On or about November 28, 2020, BRIDGES sent a message to the OCE from a second account ("BRIDGES Account-5") on Messaging Application-2. This account bore an image of BRIDGES as its profile picture, which is the same profile picture also depicted on BRIDGES Account-2.

BRIDGES Provides Tactical Instructions and Support for ISIS on How to Defeat a U.S. Military Operation and Kill U.S. Soldiers

t. After BRIDGES returned to the United States, he used BRIDGES Account-5 to continue communicating with the OCE, who was posing as the "brother" persona, including as follows:

i. On or about December 26, 2020, BRIDGES contacted the OCE, who stated, "it is good to hear from you. I was getting concerned you had run into some trouble." BRIDGES

responded, "Well now that I am back in the states investigators are always around . . . I think you know what I mean like the briefs that you get from a CI and about espionage, etc."

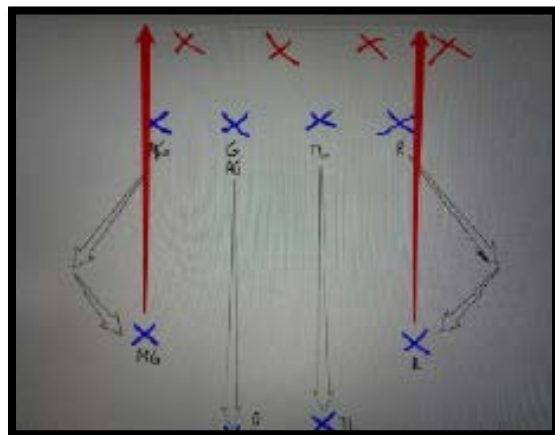
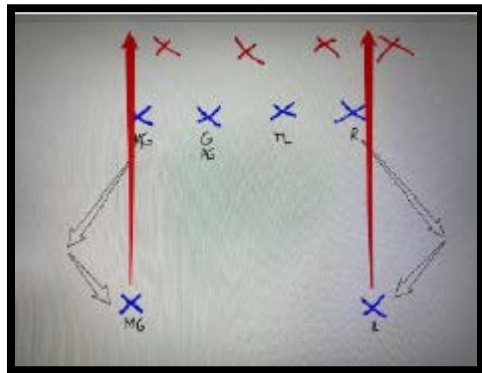
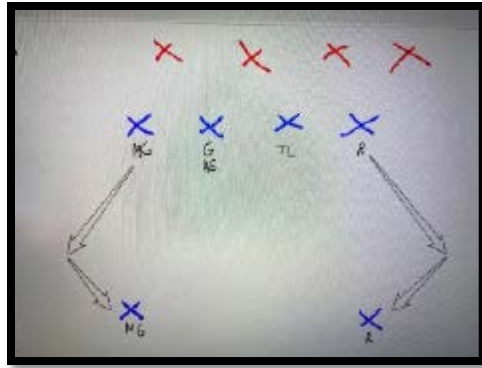
ii. On or about December 27, 2020, after the OCE stated that BRIDGES should stay safe and avoid being "compromised," BRIDGES responded, "No akh, If I were to be comprised I would either become a martyr or somehow escape the country." Based on my training, experience, and involvement in this investigation, I believe that BRIDGES was informing the OCE that if authorities realized BRIDGES was an ISIS supporter (i.e., if BRIDGES was "compromised"), BRIDGES would either conduct a suicide operation in the name of ISIS ("become a martyr") or flee the United States ("escape the country").

iii. Later in the exchange, after the OCE asked if BRIDGES was comfortable discussing further plans for an attack, BRIDGES stated that he believed it would not be appropriate to conduct an attack in the United States—because that would be "offensive jihad"—but that an attack against U.S. troops abroad would be permissible because that was "defensive jihad."

iv. At another point in the exchange, the OCE stated "Oh yes I almost forgot—the brother from Sham was asking about the bottleneck drawing you described." BRIDGES agreed to complete the drawing, and explained that the concept was based on a four-man team. BRIDGES proceeded to send the following images to the OCE with accompanying explanations describing the "bottleneck" tactical combat procedure that ISIS could use against U.S. soldiers:



BRIDGES explained that the markings below the blue "Xs" represented different types of soldiers, such as "machine gunners," "grenadiers," "assistant gunners," "team leader," and "riflesman." BRIDGES continued to explain the steps in the "bottleneck" combat procedure, sending additional diagrams, including the following sequence of images:



As BRIDGES sent the diagrams, he continued to explain the depicted troop movements, including how the ISIS fighters should fire, when they should use grenades, and how to avoid U.S. Army grenades. For example, BRIDGES stated that the OCE should tell the ISIS fighters to stay a certain distance apart "because if the enemy throws a grenade then it won't kill anyone," and BRIDGES specified the range of a particular type of U.S. Army grenade so that the ISIS fighters could avoid it.

v. On or about December 29, 2020, the OCE sent BRIDGES a message telling him that U.S. forces had killed ISIS "brothers," including the brother "most knowledgeable" about combat tactics. The OCE wrote to BRIDGES that the ISIS brothers were seeking advice about how to protect a leader, or "Emir," from another ambush of their compound by "American forces," and explained that they were "asking about the bottleneck." BRIDGES responded:

I mean the best they can do is rig the house with explosives And have a group of brothers observe Until the raid starts and then just blow the house up. I mean if they want to have defensive positions they have to be in places where the enemy [i.e., the U.S. soldiers] will never suspect them of being. Because the special forces have these houses observed before a raid and they get as much info about everything.

The OCE replied, "I think they were thinking of trying to set up defensive positions outside and then booby traps and stuff like that but wanted advice on the best way to position their forces They sent me some images (without telling the exact location obviously)."

vi. The OCE then asked if the OCE could send to BRIDGES the images purportedly provided to the OCE by the ISIS fighters showing their position, and after BRIDGES agreed, the OCE sent to BRIDGES the following satellite image, with the message, "They were asking my advice on the best place to place their weapons."



vii. The OCE continued, "And I told them I am not the man for that lol . . . They liked your bottleneck drawings so much they asked if you could help them with this too." BRIDGES responded, "Lol well can you mark what the house is And I guess the avenue of approach." The OCE replied, "haha it's the main compound that is walled in." BRIDGES then sent the following image back to the OCE with the ISIS compound circled and the message, "so the whole area is walled in?"



viii. The OCE responded, "the little houses to the east are their's too, but the Emir is in the main compound," referring to the purported ISIS leader that the fighters were seeking to protect. The OCE continued, "they have a technical and two light machine guns and two RPGs." BRIDGES responded, "I mean they are definitely being observed if they think a raid is coming . . . they could move the Emir to one of the small houses and of course give him protection, because the main compound will probably be the focus." The OCE then asked where BRIDGES thought the ISIS fighters should place their weapons. After BRIDGES asked if there was more than one exit, the OCE asked BRIDGES, "Would you mind drawing on the image like you did with the other one so I can send it to the brothers for their reference?" and "Like where to put the guns/rpgs."

ix. BRIDGES then proceeded to explain how the ISIS fighters should position themselves and their weaponry, including that they should "definitely rig the house with explosives if they can" and "Put a Light machine gun and a RPG on the roof." As he conveyed these tactical instructions, BRIDGES also provided marked-up versions of the satellite image of the purported ISIS compound diagramming his combat advice, including the following image in which BRIDGES identified an exit from the compound with an "x":



x. After the OCE informed BRIDGES that the ISIS fighters thought the U.S. soldiers would arrive via helicopter, BRIDGES advised that the fighters should "[d]efinitely get a lmg and a rpg on the roof," and "make those little building to the east as their last stand if needed, and can pick a building as their 'Alamo' that they must hold until the last man, whichever building they choose should be the same one Emir is in." After the OCE asked if BRIDGES could draw that out, BRIDGES sent the following marked-up image to the OCE:



xi. Later in the exchange, the OCE asked BRIDGES to clarify what BRIDGES meant by "Alamo," stating "Apologies akhi, I'm going back and forth between you and the brothers in Dawlah." BRIDGES then sent the following image, clarifying for the ISIS fighters the "Last Stand Area":



xii. The OCE also asked BRIDGES during the exchange if he would still consider this to be "defensive jihad," which

BRIDGES had stated he supports as described above, and BRIDGES responded "in my eyes, yes." The OCE then wrote, "I was just asking because you mentioned rigging the house to explode Which would almost definitely kill all the Special Forces The brothers will be so thankful akhi. . . I'm glad they asked me to ask you . . .Your expert advice will help our brothers kill the kuffar when they come to attack and allow them to continue on their mission." BRIDGES responded "Yes well of course get all the men out of the house and then blow the house." Based on my training, experience, and participation in this investigation, I believe BRIDGES was advising that the ISIS fighters should rig their compound with explosives, and when the U.S. soldiers entered the compound, the ISIS fighters should all leave the compound and then blow it up while the U.S. soldiers were inside.

xiii. Later that same day, BRIDGES wrote to the OCE, "Did the brothers like the info I gave?" The following day, on or about December 30, 2020, the OCE responded with a screenshot of an exchange of messages between the OCE and a purported "brother," in which the purported ISIS fighter wrote "the brother is a lion"—referring to BRIDGES—and "Inshallah this info help us protect the Amir and slaughter the cowardly American kuffar when they attack."

xiv. On or about January 6, 2021, BRIDGES sent the OCE a video, which depicts BRIDGES with part of his face covered in a tactical mask, wearing body armor, and making the index-finger gesture symbolic of support for ISIS. BRIDGES is standing in front of what appears to be the black and white "al-rama" flag widely adopted by jihadists including ISIS. In addition, Arabic chanting can be heard in the background. A screenshot from the video appears below:



xv. Between on or about January 6 and January 12, 2021, BRIDGES and the OCE exchanged messages about BRIDGES participating in an ISIS propaganda video that would highlight the attack against U.S. Special Forces that BRIDGES was seeking to facilitate, and include footage from the attack. When the OCE asked whether BRIDGES would be interested in narrating such a video, BRIDGES replied, "Yes Inshallah." BRIDGES and the OCE then discussed the script for the video and the OCE provided BRIDGES with text to read.

xvi. On or about January 12, 2021, BRIDGES sent the OCE a video in which BRIDGES appears to be wearing body armor and standing in front of what appears to be the same "al raya" ISIS flag. During the video, BRIDGES, speaking through a voice changer, promoted the purported ISIS attack on U.S. soldiers, using the

script provided by the OCE while adding his own statements. A screenshot from the video showing BRIDGES appears below:



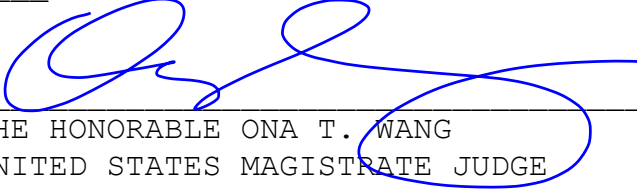
WHEREFORE, deponent prays that a warrant be issued for the arrest of COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant,

and that he be arrested and imprisoned or bailed, as the case may be.

S/ Robert Brett Lally /otw Cred. No. 25561

ROBERT BRETT LALLY, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me via reliable electronic means pursuant to
Federal Rule of Criminal Procedure 4.1, this
17th day of January, 2021



THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK