

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 8:07-mj-1520-*FEAJ*

KARIM MOUSSAOUI

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 19, 2007, in Hillsborough County, in the Middle District of Florida, defendant KARIM MOUSSAOUI, an alien, possessed a firearm, in violation of Title 18, United States Code, Section 922(g)(5)(B). I further state that I am a Special Agent with Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No



Signature of Complainant
William Ortiz, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

November 14, 2007 _____

at

Tampa, Florida _____

ELIZABETH A. JENKINS
United States Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

1 Agents he did not see what type of weapon MEGAHED used on this visit to the
2 range.

3 5. On August 13 and again on August 30, 2007, MOUSSAOUI gave
4 the FBI consent to search of his laptop computer.

5 6. On August 30, 2007, FBI Joint Terrorism Task Force ("JTTF")
6 Agents asked MOUSSAOUI if he had ever been to a shooting range with
7 MEGAHED and others. MOUSSAOUI indicated that he, MEGAHED and others
8 went to a shooting range but that he (MOUSSAOUI) did not fire any weapons.
9 According to MOUSSAOUI, he only took pictures at that time.

10 7. An employee from SHOOT STRAIGHT GUN and ARCHERY
11 RANGE, 3909 North Highway 301, Tampa, Florida, told the FBI that on July 11,
12 2007, MOUSSAOUI, MEGAHED and AHMED A. SHERIF MOHAMED visited that
13 range. Records there reflect that MEGAHED rented a Glock 17, 9mm. handgun on
14 that date.

15 8. SHOOT STRAIGHT records also indicated that on July 11, 2007,
16 MEGAHED signed a range membership agreement with SHOOT STRAIGHT GUN
17 and ARCHERY RANGE.

18 9. Another SHOOT STRAIGHT GUN and ARCHERY RANGE
19 employee advised that on July 19, 2007, MEGAHED rented a Walther G22 rifle
20 and a Smith & Wesson .22 caliber handgun. During his firing of the guns, the
21 Walther became unserviceable and MEGAHED was issued a 9mm. Glock 19 to
22 continue firing. A surveillance video which SHOOT STRAIGHT provided to the FBI
23 shows MOUSSAOUI and others entering that range on that date.

24 10. During later exploitation of a computer which agents found at the
25 residence of YOUSSEF MEGAHED, FBI JTTF agents found pictures of
26 MOUSSAOUI standing at a firing lane, possessing a shoulder fired weapon and
27 wearing the type of hearing protection shooters use at a shooting range. The
28 photograph depicts him holding a firearm that is consistent in appearance with one

1 of the firearms which MEGAHED had rented at the SHOOT STRAIGHT range on
2 July 19, 2007. The surrounding area in the photograph appears to be that of the
3 shooting range at SHOOT STRAIGHT. Moreover, the clothing that MOUSSAOUI is
4 wearing in that photograph is consistent with the clothing which he is wearing in the
5 July 19, 2007 surveillance video from SHOOT STRAIGHT surveillance cameras.

6 11. On November 1, 2007, Bureau of Alcohol, Tobacco and
7 Firearms ("ATF") Special Agent Kevin Richardson advised your affiant that none of
8 said weapon brands, neither the Walther, the Smith & Wesson nor Glock were
9 manufactured in the State of Florida and that all three firearms described above
10 had thus traveled in interstate commerce prior to being in the state of Florida.

11 12. On October 31, 2007, Immigration & Customs Enforcement
12 Special Agent Robert Lorenz, assigned to the Tampa FBI JTTF, advised your
13 affiant that KARIM MOUSSAOUI is an alien who is currently in the United States
14 on an F-1 Non-immigrant Student Visa. As such, MOUSSAOUI was admitted to
15 the United States prior to July, 2007 under a non-immigrant visa as that term is
16 defined in Section 101(a)(26) of the Immigration and Nationality Act and that ICE
17 records show that MOUSSAOUI is also not the type of alien present in the United
18 States under the circumstances set forth in 18 U.S.C. § 922(y)(2).

19 **CONCLUSION**

20 13. WHEREFORE, your affiant respectfully submits that there is
21 probable cause to believe that KARIM MOUSSAOUI has committed a violation of
22 federal law, to wit: the possession or receiving of a firearm by a person admitted to
23 the United States under a non-immigrant visa, in violation of Title 18, United States
24 Code, Section 922(g)(5)(B).


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Further your affiant sayeth naught.



William Ortiz
Special Agent
Federal Bureau of Investigation

Sworn to before me
this 14th day of November, 2007.



ELIZABETH A. JENKINS
U.S. Magistrate Judge