

THE STATE OF TEXAS

§
§
§
§
§

IN THE 488TH DISTRICT COURT

VS.

OF

SHEHZAD, LAITH ADIL

HARRIS COUNTY, TEXAS

MOTION FOR SUFFICIENT BAIL

THE STATE OF TEXAS, by and through its Assistant District Attorney, requests this Court enter a sufficient bail pursuant to Tex. Code Crim. Proc. Ann. Arts. 17.09(3), 17.15. Sufficient and non-oppressive bail is required to give proper consideration to the nature of the offense, protect the safety of the victim and community, and provide reasonable assurance that the defendant will return. The nature of the case reflects:

1. The instant offense was committed using a deadly weapon. Specifically, the Defendant intended to commit a mass shooting event using a Glock semi-automatic firearm equipped with a standard magazine, an extended magazine, and a drum style magazine. Between these magazines, the Defendant was able and equipped to discharge several dozens of rounds.
2. As a part of the instant offense, the Defendant was communicating with an unknown individual who claims to be a confined extremist cell member who is in custody in the Philippines for terrorist acts. The Defendant was soliciting support from this individual, and was asking for guidance about the religious outcomes of dying as a martyr in the furtherance of extremist ideals. Additionally, the Defendant was seeking assurance from this individual that the firearm with the capacity discussed above, was "powerful" enough to complete a mass casualty event.
3. At the time of the instant offense, the Defendant was under the supervision of the Texas Department of Juvenile Justice. The Defendant had been found to have engaged in delinquent conduct in the 313th District Court for the offenses of Possession of Components of an Explosive Device and Retaliation. During those cases, the Defendant had homemade explosive and incendiary devices, and was planning to commit the offense of murder using these devices. The Defendant had been previously ordered to the custody of the Chief Juvenile Probation Officer for these offenses.
4. During the time of his placement with the CJPO, the Defendant was found to have committed a major violation of his placement when he was found to have a journal containing extremist propaganda advocating the use of violence, instructions on the creation of high explosives, and diagrams on the creation and function of various types of explosive devices. Additionally, this journal contained statements advocating for dying as a martyr in furtherance of extremist ideals.
5. Prior to the instant offense, in 2021, the Defendant admitted to being self-radicalized and subscribing to the ideology and goals of ISIS to members of the FBI. The Defendant has self-admitted that he is an expert with explosives and has attempted to solicit roles in multiple mass casualty events as an explosives expert.

6. On or about October 15, 2004, the U.S. Secretary of State designated al-Qaeda in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as an Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act ("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 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), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, and Dawla al Islamiya. 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.
7. On the date of the instant offense, the Defendant became aware that the FBI was at his home to meet with him due to the instant offense. After learning this, the Defendant concealed the firearm and a cell phone that contained evidence of the instant offense.
8. During the commission of the instant offense, the Defendant was utilizing multiple Facebook accounts to contact multiple accounts associated with extremist Islamic views. On the Defendant's Facebook accounts is located a large number of ISIS propaganda and recruitment videos, which were being sent to and received by the Defendant's accounts.
9. At the time of this offense, as a condition of his probation, the Defendant was not permitted to possess or use any cell phones or computers. The Defendant was violating the conditions of his juvenile supervision by possessing the devices he was using to communicate with the above listed accounts.
10. A review of the Defendant's Facebook accounts indicates that the Defendant was imminently preparing to commit a mass casualty event, and was prevented from doing so by unilateral action taken by the rideshare service he was attempting to use for transportation.

THE STATE OF TEXAS prays that the Court will enter a sufficient and non-oppressive bond of: \$10,000,000.00

RESPECTFULLY SUBMITTED,

/s/George Lindsey

George Lindsey

Assistant District Attorney

Harris County District Attorney's Office

TBC No. 24099050

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that a true and correct copy of this instrument was e-mailed to counsel for the Defendant on this date by electronic service using his State Bar of Texas official address for electronic service.

/s/George Lindsey

George Lindsey
Assistant District Attorney
Harris County District Attorney's Office
TBC No. 24099050

Unofficial Copy Office of Marilyn Burgess District Clerk

CAUSE NO. 190712101010

THE STATE OF TEXAS

VS.

SHEHZAD, LAITH ADIL

§
§
§
§
§

IN THE 488TH DISTRICT COURT

OF

HARRIS COUNTY, TEXAS

ORDER

Having considered the State's Motion for Sufficient Bail, the State's request for bail is:

GRANTED

SIGNED AND ENTERED on .

Judge Presiding
Harris County, Texas