

**FILED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

**November 30, 2025**  
KAREN MITCHELL  
CLERK, U.S. DISTRICT  
COURT

UNITED STATES OF AMERICA

v.

MOHAMMAD DAWOOD ALOKOZAY

4:25-MJ- 730

**Filed Under Seal**

**COMPLAINT**

I, Justin Killian, being first duly sworn, hereby depose and state as follows:

**Introduction**

1. I make this affidavit in support of a criminal complaint charging Mohammad Dawood Alokozay (“Alokozay”) with Transmitting a Threatening Communication in Interstate Commerce in violation of 18 U.S.C. § 875(c).

**Agent Background**

2. I am a Special Agent with the Federal Bureau of Investigation and have been since January 2019. I am currently assigned to the Dallas Division, where I serve on the North Texas Joint Terrorism Task Force (“NTJTTF”). In this capacity, I am responsible for investigating domestic and international terrorism cases, including, but not limited to, weapons of mass destruction violations, racially motivated acts of violence, and militia/anti-government extremists. I have received training in, among other areas, domestic and international terrorism, to include extremist tactics, techniques, and procedures. I have experience in the review of evidence obtained during the execution of these search warrants. Prior to joining the FBI, I served as a U.S. Army

officer for the 75th Ranger Regiment, where I conducted three deployments to Afghanistan to target the Taliban and other extremist organizations.

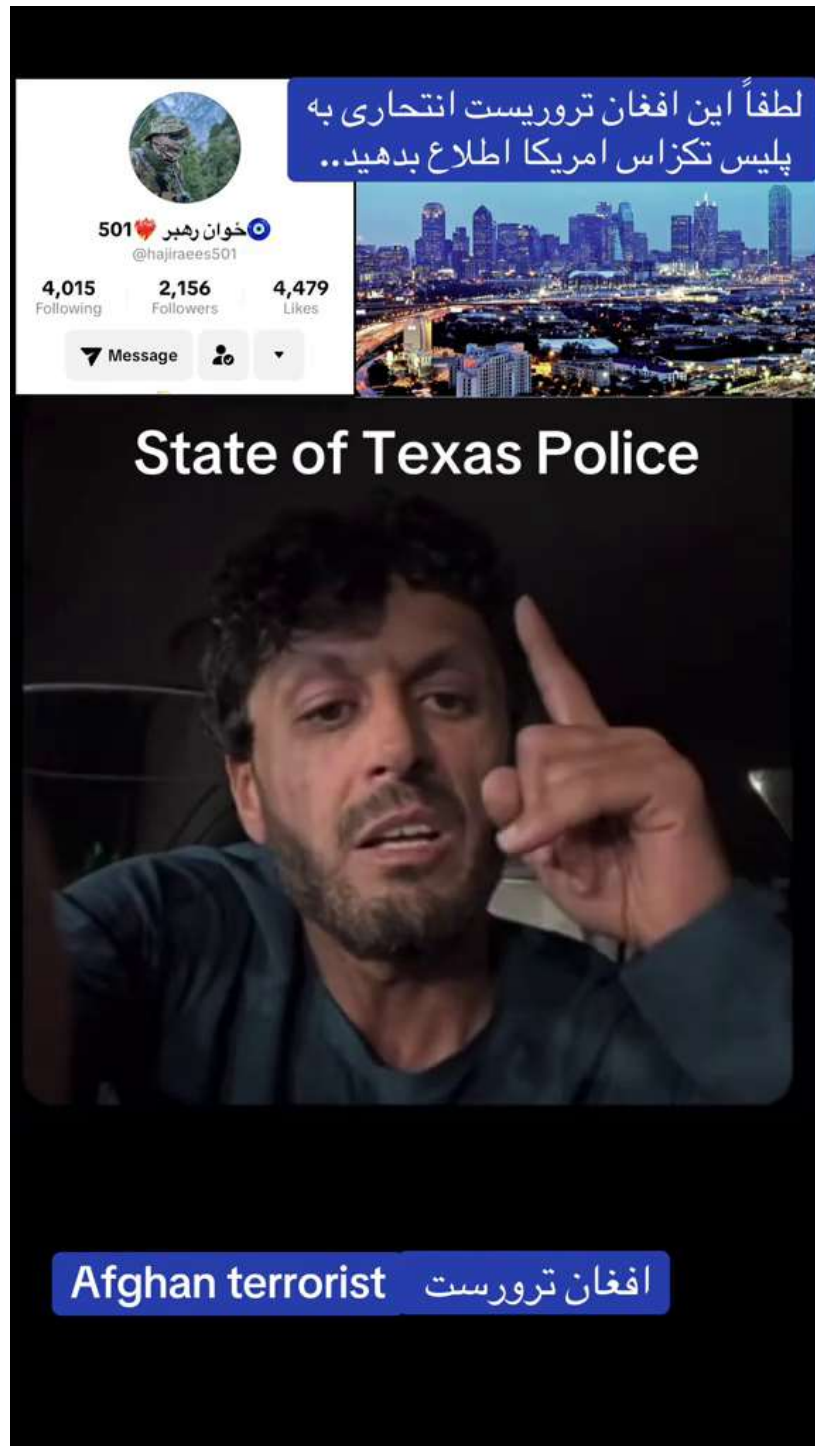
3. The information contained in this affidavit is based on, among other things, my personal knowledge and observations during the course of this investigation, my training and experience, information provided to me by other law enforcement agencies, and my review of information obtained during the investigation. This affidavit is intended to show merely that there is probable cause to believe that Alokozay has violated 18 U.S.C. § 875(c). As a result, I have not included each and every fact known to me regarding this matter.

### **Applicable Law**

4. Pursuant to 18 U.S.C. § 875(c), “[w]hoever transmits in interstate or foreign commerce any communication containing . . . any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.”

### **Probable Cause**

5. On November 25, 2025, the FBI received information from law enforcement partners with the Texas Department of Public Safety (“DPS”) regarding a video that was being shared on TikTok, X and Facebook. The video, which was featured in multiple posts by multiple accounts, depicts a man (later identified as Alokozay) speaking Dari, a language I know to be commonly spoken in Afghanistan. The man gestures angrily while speaking to a “front-facing” camera, while apparently sitting alone in a vehicle at night. A screenshot of one of the posts is below:



6. At least two other male voices can be heard on the video interacting with Alokozay. The post depicted above also features Dari writing and a screengrab of a TikTok profile.<sup>1</sup>

7. The video was reviewed by a Dari-certified FBI linguist who translated and summarized the audio and text visible in the post. In the video, Alokozay claimed he would conduct a suicide attack on the other participants on the call, whose voices can be heard, as well as “infidels,” which I understand to mean non-Muslims. Alokozay claimed he lives in the Dallas-Fort Worth area (“DFW”) and that he would build a bomb in his vehicle in Fort Worth. He also referred to a particular yellow cooking oil container that was favored by Taliban in building improvised explosive devices (“IEDs”) in Afghanistan. Alokozay claimed the Taliban were dear to him.

8. When asked by the two other individuals heard on the video where he would find bomb-making material, Alokozay claimed he would find parts in the United States and that it was none of the other’s business. He then cursed and threatened to kill the others on the call. He concluded that he was not afraid of deportation or getting killed. When asked why Alokozay came to the United States, he responded that it was to kill the others on the call. Alokozay stated he wanted to conduct a suicide attack on Americans, too.

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<sup>1</sup> The writing visible on the post, including the phrase “State of Texas Police” and “Afghan terrorist,” I believe was added by some other TikTok or social media user, and not by Alokozay or law enforcement.

9. DPS analyzed the video and, using facial recognition technology, identified Alokozay's driver license photograph as a likely match. Texas Department of Motor Vehicles ("DMV") records indicated Alokozay maintained a residence in Fort Worth and had registered at least two vehicles in Texas. Alokozay's driver license photo is below:



10. I personally reviewed the above photograph and compared it to screenshots from the previously described video. Based on my personal review, I confirmed that Alokozay was the same individual in the video.

11. The FBI reviewed records from the Texas Workforce Commission ("TWC") for Alokozay and determined he worked in Haslet, Texas. The FBI then contacted Alokozay's employer and determined his work schedule.

12. On or about the morning of November 25, 2025, agents with the FBI established physical surveillance on Alokozay's Fort Worth residence. During surveillance, agents confirmed the presence of both of Alokozay's Texas-registered vehicles.

13. The same day, DPS officers obtained an arrest warrant for Alokozay based on a complaint charging him with terroristic threats, in violation of Texas Penal Code § 22.07, for the November 24, 2025 TikTok statements. They also obtained a search warrant for Alokozay's Fort Worth residence.

14. Surveilling agents observed Alokozay depart his residence in the late-afternoon, apparently on his way to his work in Haslet. Alokozay stopped at a gas station, where I arrested him with other federal agents and Fort Worth Police Officers.

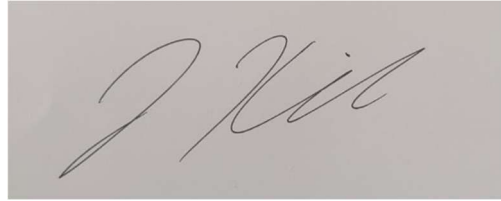
15. Alokozay was transported to a nearby Texas Department of Public Safety facility where I interviewed him with a Dari-interpreter. Using the interpreter, I advised Alokozay of his *Miranda* rights and he then agreed to speak with me.

16. During the interview, Alokozay confirmed he was the individual depicted in the video and admitted to making the statements in the video. Alokozay explained that the TikTok video was a recording of a TikTok group video chat he participated on or about the evening of November 23, 2025, while in his vehicle in Fort Worth. Alokozay also admitted that he was contacted the next day, November 24, 2025, by people who had seen the video of him shared elsewhere on social media. Alokozay responded by deleting his TikTok application from his phone, though it was unclear if Alokozay actually deleted his TikTok account.

17. I know, based on my training and experience, that the TikTok application transmits posts throughout the country via the Internet, in and affecting interstate commerce. I also know, based on the investigation, that this threat was transmitted, as it appears Alokozay is communicating from a vehicle with at least two other individuals not visible in the vehicle. Therefore, Alokozay was likely using a TikTok feature which allows users to transmit communications using the internet.

18. Based on the foregoing, I submit there is probable cause to believe that, on or about November 23, 2025, Alokozay knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, namely, the unidentified individuals speaking on the TikTok video, non-muslims, Americans in general, and specifically individuals in and around Fort Worth, Texas for the purpose of issuing a threat, with knowledge that the communication would be viewed as a threat, and with conscious disregard of a substantial risk that the communication would be viewed as a threat, in violation of 18 U.S.C. § 875(c).

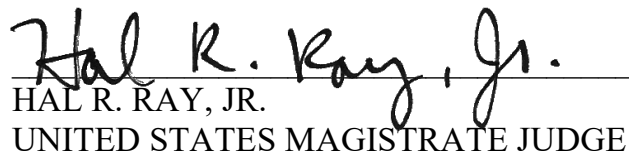
Respectfully submitted,

A rectangular box containing a handwritten signature in dark ink, which appears to read "J Killian".

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JUSTIN KILLIAN  
Special Agent  
Federal Bureau of Investigation

Agent sworn and signature confirmed via reliable electronic means, pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure on November 30, 2025 at 3:58 p.m. in Fort Worth, Texas.

A handwritten signature in dark ink, which appears to read "Hal R. Ray, Jr.", written over a horizontal line.

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HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE

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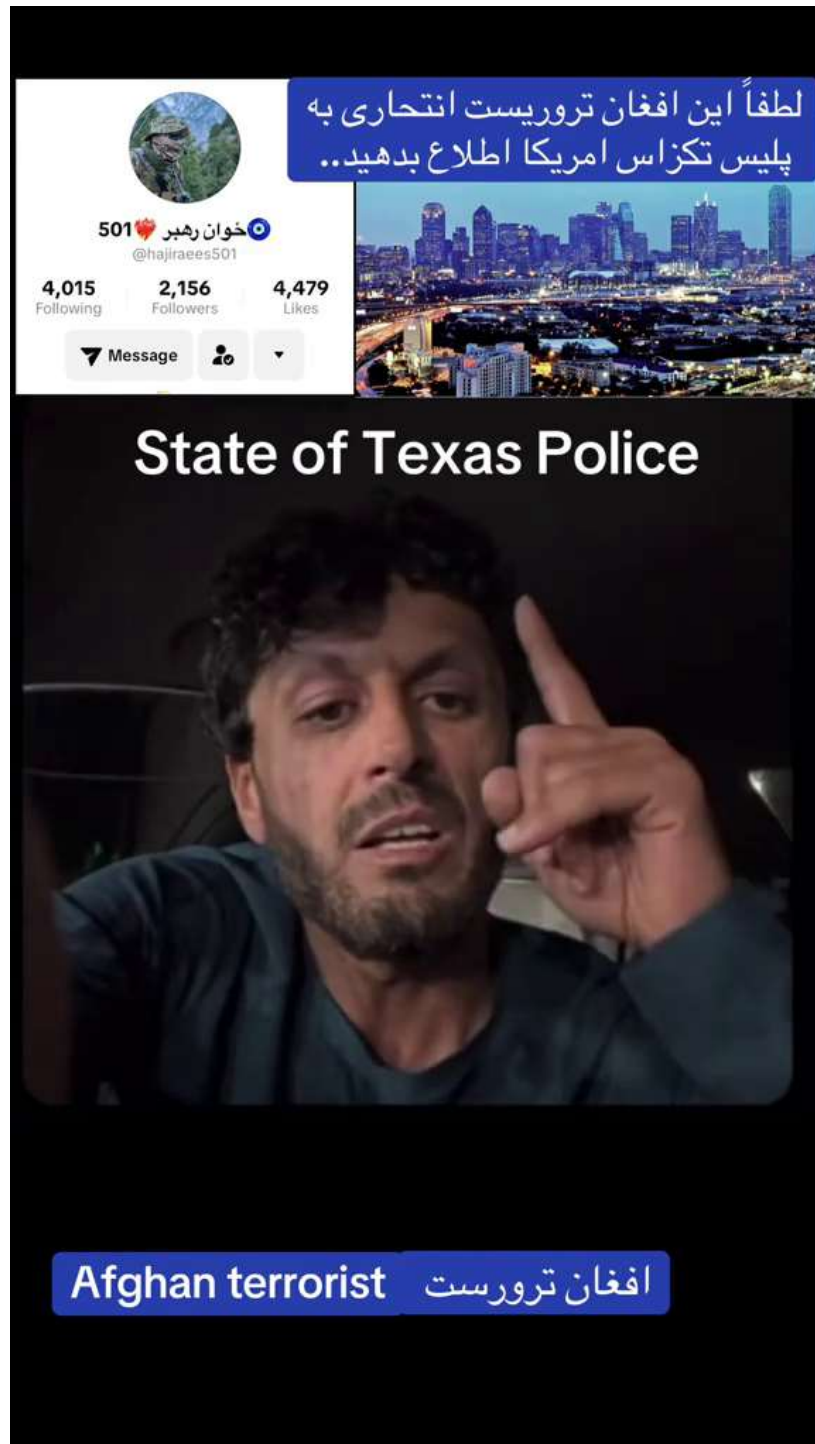
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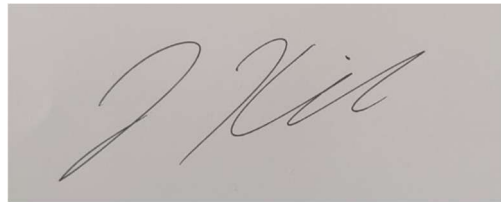
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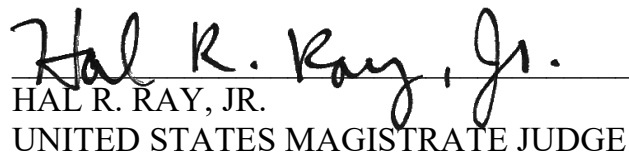
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