

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No.: 21-mj-120

MOHAMMAD HAROON IMAAD,

Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION
113(a)(8)

BEFORE Chief United States District Judge
James D. Peterson

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

Count 1

On or about September 7, 2021, in the Western District of Wisconsin, the
defendant,

MOHAMMAD HAROON IMAAD,

at a place within the special maritime and territorial jurisdiction of the United States,
namely Fort McCoy, on land acquired for the use of the United States and under its
concurrent jurisdiction, did assault B.I., who was his spouse, by strangling, suffocating
and attempting to strangle and suffocate B.I.

(All in violation of Title 18, United States Code, Section 113(a)(8))

This complaint is based on the attached affidavit of Mark Meyers.

Mark Meyers
Special Agent, Federal Bureau of
Investigation

Sworn to me telephonically this 10th day of September, 2021



HONORABLE JAMES D. PETERSON
Chief United States District Court Judge

AFFIDAVIT

STATE OF WISCONSIN)
) ss.
DANE COUNTY)

I, Mark Meyers, having been duly sworn, depose and state as follows:

1. I have worked as a special agent with the Federal Bureau of Investigation (FBI) since 2014. From 2015-2020 I was assigned to investigate violent crimes near Bemidji, Minnesota on the Red Lake Indian Reservation. I have training and experience investigating violent crimes. For example, I have authored numerous criminal complaints and search warrants related to violent crimes and have participated in their execution. I have attended numerous trainings related to the investigation of violent crimes. Prior to working for the FBI, I worked for the Sparta Police Department from 2007-2014.

2. The facts in this affidavit come from my training and experience, as well as my participation in the investigation including from reports prepared by and obtained from Army personnel working at Fort McCoy, and other federal law enforcement agents and officers, all of whom I believe to be truthful and reliable.

3. This affidavit does not contain every fact I know about this investigation, but is merely intended to show probable cause to believe that Mohammad Haroon Imaad committed a violation of Title 18, United States Code, Sections 113(a)(8) (Assault of a Spouse by Strangling).

4. Title 18, United States Code, Section 113(a), states "Whoever, within the special maritime and territorial jurisdiction of the United States is guilty of an assault

shall be punished as follows: . . . (8) Assault of a spouse, intimate partner, or dating partner by strangling, suffocating, or attempting to strangle or suffocate . . . ”

5. Fort McCoy is a United States Army base located in the Western District of Wisconsin and is under the territorial jurisdiction of the United States. Title 18 United States Code, Section 7(3); Wis. Stat. 1.02(2).

Background

6. At the end of August 2021 approximately 13,000 refugees from Afghanistan have been resettled onto Fort McCoy. They are still currently living there in various buildings as of the date of this affidavit.

Probable Cause for Assault of a Spouse by Strangling

7. On September 7, 2021, Army soldiers responded to a domestic disturbance at Fort McCoy among the Afghan refugee population. B.I., a female Afghan refugee, told one of the soldiers (through an interpreter) that she had been struck and choked by her husband. She also notified the soldier that her husband struck the children on multiple occasions. The soldier noted that he saw visible bruising on B.I.'s right eye and redness on the front portion of her throat.

8. With the assistance of an interpreter and a soldier, a statement was written that B.I. adopted, which described the incident that took place during the morning of September 7, 2021 and included the following questions and answers:

Q: Is this the first time he put hands on you?

A: No, this is not the first time. He beat me many times in Afghanistan to the point I lost vision in both eyes.

Q: What's the pain in your neck from?

A: Mohammed choked [sic] me and threatened to kill me.

9. A female soldier took photographs of B.I. that show redness on her neck and shoulders.

10. Because of this incident, B.I. and her children were moved into an all-female barracks.

11. On September 9, 2021, B.I. fainted and was taken to receive medical treatment at the Troop Medical Clinic on Fort McCoy. She was interviewed by a soldier there through an interpreter. She stated that she had been the victim of hitting, strangulation, verbal abuse as well as rape since arriving to Fort McCoy at the hands of Mohammad Imaad. She stated that Mohammad Imaad has repeatedly threatened her, telling her that nine women have been killed since getting to Fort McCoy and that she would be the tenth. According to B.I., Mohammad threatened to send her back to Afghanistan where the Taliban could deal with her. According to B.I., Mohammad told her that the police would not believe anything that she told them.

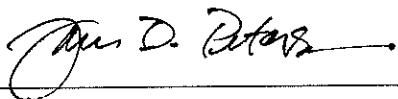
12. B.I. told officers that her mom was currently in Building 2610 (the all-female barracks) and she was worried for her mother's safety. A soldier went there to protect her mother and immediately upon the soldier's arrival he noticed a male walking towards the front door who informed the soldier that he was looking for his wife who was in the clinic. Another soldier asked the individual how many children he had, and he replied an oldest son and two daughter. At that point, since the soldiers knew that B.I. and Mohammad had an oldest son and two younger daughters, the

soldier detained the individual. The individual later identified himself as Mohammad Haroon Imaad.

Dated this 10th day of September 2021.

Mark Meyers
Special Agent, Federal Bureau of Investigation

Sworn to me telephonically this 10th day of September 2021.



James D. Peterson
Chief United States District Judge