

NOV 03 2022

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY BPM DEP CLK

United States of America  
v.

NAHRO SUDOI INNAB

Case No. 5:22-mj-2039-JG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 3, 2022 in the county of Nash in the  
Eastern District of North Carolina, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18 United States Code Section 1958	Use of interstate commerce facilities in the commission of murder-for-hire

This criminal complaint is based on these facts:

SEE ATTACHMENT

Continued on the attached sheet.

On this day, Daniel J. Robertson appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Complaint.

Date: 3 Nov. 2022

City and state: Raleigh, North Carolina

Complainant's signature

Daniel J. Robertson, FBI Special Agent

Printed name and title

Judge's signature

James E. Gates, U.S. Magistrate Judge

Printed name and title

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA**

**Probable Cause Affidavit**

I, Daniel J. Robertson, hereinafter designated as affiant, having been duly sworn according to law, deposes and state that:

1. Affiant is employed as a Special Agent (hereinafter SA) for the Federal Bureau of Investigation (hereinafter FBI) and has been so employed since January, 2009. In this capacity, I have conducted investigations related to threats of violence and conspiracies to commit acts of violence in both Criminal and National Security matters.

2. Affiant's duties include, but are not limited to, enforcing the federal laws which include, but are not limited to, federal laws in where threats of violence are made with an Interstate Nexus. For example, in a previous assignment your affiant was assigned to the FBI Oklahoma City Division, Tulsa Resident Agency (hereinafter RA) Joint Terrorism Task Force (hereinafter JTTF) and to the FBI's Counterterrorism Division (hereinafter CTD). As a member of the Tulsa RA JTTF and FBI CTD your affiant investigated and assisted in investigating various threats of violence some of which were committed with an Interstate Nexus. As a member of FBI Charlotte, Manteo RA, your affiant has been involved in multiple investigations involving threats of violence and/or violent acts, for example armed robberies, assaults with deadly weapons, shootings, and other violent

crimes, some of which affected Interstate Commerce. Prior to becoming employed by the FBI, affiant was an officer in the United States Marine Corps.

**Purpose of Affidavit**

3. Affiant makes this affidavit in support of an application for the issuance of a criminal complaint in the matter of NAHRO SUDOI INNAB (hereinafter referred to as INNAB, Also Known As “Nick”) for a suspected violation of Title 18, United States Code, Section 1958 – use of interstate commerce facilities in the commission of murder-for-hire. INNAB is a Rocky Mount, NC-based individual who owned/owns and/or invests in grocery stores/convenience stores in the Rocky Mount, NC area.

4. The facts contained in this affidavit are the product of my investigation and the investigation and observations of other law enforcement officers. The facts contained herein do not reflect all of my knowledge on this matter but are merely to establish probable cause that the above captioned violation has occurred. The recordings referenced below are designed to be summaries of some of the pertinent content and not designed to be a verbatim transcription of each spoken word.

5. In late October, 2022, a NC Alcohol Law Enforcement (hereinafter ALE) Confidential Source of Information (hereinafter CSI) contacted NC ALE SA Adam Boyd and advised that INNAB had propositioned the CSI to kill another subject in exchange for \$15,000. INNAB made the offer on October 21, 2022, in Rocky Mount, North Carolina, in the Eastern District

of North Carolina. INNAB advised CSI that the intended victim worked for or with INNAB and stole \$75,000 of INNAB's money.

6. Per NC ALE, the CSI has provided information in the past that has been deemed credible and reliable. The CSI has conducted multiple purchases of narcotics and multiple purchases of weapons at law enforcement's direction. In connection with this investigation, CSI advised law enforcement that he or she has a lengthy history with INNAB and has committed criminal acts for INNAB in the past.

7. Law enforcement identified the intended victim as SAMIR KHAMIS SIRHAN (hereinafter SIRHAN), who also lives in Rocky Mount, NC. This murder-for-hire proposition occurred on October 21, 2022, and the CSI recorded some of the encounter with audio and video.

8. On Monday, October 24, 2022 your affiant and other law enforcement officers met with the CSI to review the captioned October 21, 2022 recording. The CSI provided context as the recording played and identified various locations through Google and Google Maps. On October 21, the CSI entered INNAB's vehicle in Rocky Mount, NC in where INNAB drove the CSI to various Rocky Mount locations for the purpose of orienting the CSI to SIRHAN's pattern of life and vulnerabilities. For example, INNAB drove/showed the CSI a good location to kill SIRHAN. Specifically, INNAB showed the CSI the parking area of a building that was formerly operated as a casino located on the northeast corner of the intersection of Sunset Avenue

and Halifax Road in Rocky Mount. The CSI identified this address as as 4098 Sunset Avenue, Rocky Mount, NC (hereinafter referred to as LOCATION 1). INNAB explained that SIRHAN leaves his vehicle, a black Honda passenger vehicle, at LOCATION 1 and enters or works on a truck there. INNAB also warned the CSI that a building at LOCATION 1 has a surveillance camera. INNAB offered to pay the CSI \$15,000 to kill SIRHAN. The CSI asked INNAB if he wanted him wounded to which INNAB responded he wanted him “dead” and to “finish him up”. INNAB also drove the CSI past SIRHAN’s residence in Rocky Mount, NC. The CSI could not recall the exact location of the residence but explained while reviewing Google Earth that the residence was down Mayfair Drive in Rocky Mount, NC. The CSI described the residence as brick and located on a corner lot. The CSI further explained that LOCATION 1 and the residence on Mayfair Drive were located close to one another. INNAB also advised CSI that SIRHAN was on federal probation. The CSI also introduced the likelihood to INNAB that one of the CSI’s associates would assist in the murder, to be further explained below.

9. Your affiant and the investigative team learned that SIRHAN has a listed address with the NC Department of Motor Vehicles (hereinafter NC DMV) of 228 Mayfair Drive, Rocky Mount, NC 27804. A review of Google Earth revealed that 228 Mayfair Drive is a brick house which sits on the corner of Mayfair Drive and Belgreen Drive in Rocky Mount, NC. Per Google, the distance between LOCATION 1 and the residence on Mayfair Drive is

approximately .6 miles. A review of the National Crime Information Center (hereinafter NCIC) for SIRHAN revealed prior federal convictions. A review of the Public Access to Court Electronic Records database, also known as PACER, revealed that SIRHAN completed federal supervised release in October, 2020. Therefore, your affiant believes there is probable cause that the SIRHAN being referred to is SAMIR KHAMIS SIRHAN.

10. On Wednesday, October 26, 2022, at the guidance and direction of NC ALE, the CSI placed an audio-recorded consensually monitored cellular telephone call with INNAB. The two agreed to meet in Rocky Mount, NC to discuss the murder-for-hire plot. Later, on October 26, 2022, the CSI met INNAB and entered INNAB's vehicle. CSI was equipped with an audio-video recording device. INNAB showed the CSI similar locations as INNAB had shown the CSI during the October 21, 2022 encounter referenced above. INNAB also provided prospective egress routes after the murder-for-hire occurred, for example Interstate 95. The two also discussed how payment would be made after the murder-for-hire occurred. INNAB indicated he would pay CSI "once he is dead." INNAB further explained that money is not a problem. INNAB also remarked about the lack of police presence in the area. The CSI further highlighted the likelihood that an associate (an FBI Undercover Officer, hereinafter referred to as UCO) would assist the CSI with SIRHAN's murder.

11. On Sunday, October 30, 2022, INNAB contacted CSI by cellular telephone. This telephone conversation was not audio recorded; however, officers debriefed the CSI on October 31, 2022, regarding the content of the conversation. According to CSI, INNAB asked the CSI when he/she may conduct SIRHAN's murder. INNAB advised CSI to "get it done". INNAB also explained that he had seen SIRHAN working on his truck on the last few days and suggested the weekend may be ideal to commit the murder. CSI explained that CSI's associate (UCO) would be coming into town in the coming days and CSI would get back with INNAB about the details.

12. On October 31, 2022, CSI conducted a consensually monitored cellular telephone call with INNAB with law enforcement present. The CSI asked if INNAB could obtain a motel room for CSI and CSI's associate in Rocky Mount, NC. INNAB told the CSI that he would get them a motel room upon their arrival.

13. In the evening hours of October 31, 2022, the CSI contacted ALE SA Boyd and explained that INNAB had called CSI and explained that INNAB did not want a motel room connected to him. Further, INNAB advised that SIRHAN is there at the parking lot each night, and this is where the murder should occur.

14. On Wednesday, November 2, 2022, officers attempted to meet with INNAB to introduce the captioned FBI UCO. INNAB refused to meet with the UCO but told the CSI to "just get it done." A short time later, INNAB

placed a cellular telephone call to the CSI which was recorded and also supervised by law enforcement. In pertinent part, INNAB told the CSI that SIRHAN would be at the aforementioned parking area later that afternoon and to make the murder look like a robbery.

15. In recent days, law enforcement has conducted physical surveillance at various locations in Rocky Mount, NC believed to be pertinent in this investigation, including LOCATION 1. Officers observed a black Honda CRV at LOCATION 1.

16. In the afternoon hours of Wednesday, November 2, 2022 officers conducting physical surveillance noted that the above captioned Honda CRV was no longer present at LOCATION 1 but a dump truck was now there. Officers in turn located both a Honda CRV and SIRHAN at 228 Mayfair Drive, his listed DMV address. Officers observed SIRHAN return to LOCATION 1, at a similar time and manner and in a similar vehicle as INNAB had previously described.

17. A short time later, officers observed SIRHAN washing his dump truck at LOCATION 1. The above referenced Honda CRV was also present at LOCATION 1. Officers approached SIRHAN and explained that there was a credible threat to his life. SIRHAN agreed to cooperate with investigators. He was subsequently relocated to a nearby hotel in Rocky Mount, NC.

18. Later in the evening on Wednesday November 2, 2022, officers enlisted the assistance of the Rocky Mount Police Department (hereinafter

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RMPD) to stage a crime scene at LOCATION 1 to demonstrate to INNAB that SIRHAN had been murdered. As noted above, INNAB would not compensate the killer (s) until SIRHAN was dead and INNAB had proof of the same.

19. Following the staging of this crime scene, the captioned CSI conducted a consensually monitored recorded cellular telephone call to INNAB to tell him that the murder was completed and to arrange payment. INNAB advised CSI not to speak about the murder and ended the telephone call.

20. Later in the evening on Wednesday November 2, 2022, the CSI placed a consensually monitored recorded cellular telephone call to INNAB. During the call, INNAB instructed the CHS to meet him on Sunset Avenue in Rocky Mount the following morning.

21. In the morning hours of Thursday, November 3, 2022, the CSI placed a consensually monitored recorded cellular telephone call to INNAB. During the call, INNAB explained he was still in bed but would meet the CSI at Lowe's in Rocky Mount, NC in approximately one hour.

22. A short time later, INNAB called the CSI via cellular telephone which was consensually recorded. INNAB told the CSI to drop the UCO off at the Waffle House and to subsequently meet the CSI, alone, at Lowe's.

23. In the Lowe's parking area, the CSI entered INNAB's dark in color GMC Sport Utility Vehicle. This encounter was audio video recorded by law enforcement. Following this event, the CSI debriefed with agents and provided the following information. In summary, INNAB explained that

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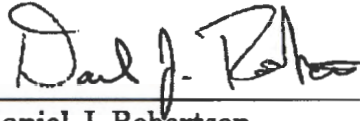
without proof of a body, he could not pay. The CSI showed INNAB SIRHAN's wallet which, among other things, contained SIRHAN's driver's license bearing his photograph. INNAB was adamant that he had to see SIRHAN's body. INNAB pointed toward the CSI's telephone and stated words to the effect that INNAB only wanted SIRHAN beat up. INNAB further explained that the two could not communicate on the CSI's telephone and offered the CSI money to purchase the CSI's cellular telephone which the CSI declined. INNAB stated he would meet the CSI at 11:00 every day but did not want to talk on the phone any longer. INNAB advised the CSI to put the body where people can find it, and reiterated to not use the phone any longer. INNAB gave the CHS \$1,000 in US Currency and the encounter ended.

24. Your Affiant is aware that pursuant to North Carolina General Statute (NCGS) Section 14-17, it is unlawful for anyone to commit murder that is "perpetrated by means of a nuclear, biological, or chemical weapon ... poison, lying in wait, imprisonment, starving, torture, *or by any other kind of willful, deliberate, and premeditated killing...*"

25. Your Affiant is also aware that INNAB used a cellular phone on multiple occasions throughout the murder-for-hire plot to plan, coordinate, and further the murder-for-hire plot. Your Affiant is aware that a cellular phone is a facility of interstate commerce.

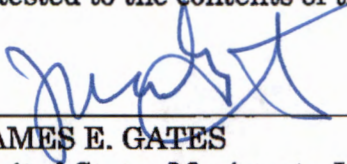
26. Based on the information above, your Affiant believes probable cause exists to believe that NAHRO SUDOI INNAB did knowingly use a

facility of interstate commerce, a cellular phone, with the intent that a murder be committed in violation of NC G.S. Section 14-17, and did provide payment as consideration to commit such a violation.



Daniel J. Robertson  
Special Agent  
Federal Bureau of Investigation

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, this affiant appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this affidavit.



3 Nov. 2022

JAMES E. GATES  
United States Magistrate Judge  
Eastern District of North Carolina