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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, Defendant.	**INDICTMENT** 26 Cr. ___

COUNT ONE
(Conspiracy to Provide Material Support to a Foreign Terrorist Organization)

The Grand Jury charges:

Overview

1. For nearly a decade, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, has conspired and urged others to commit violent attacks against the United States and U.S. citizens on behalf of terrorist organizations, including multiple global terror proxies for the Iranian regime.

2. More specifically, since at least in or about 2017, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, has been a member of Kata'ib Hizballah, a U.S. designated foreign terrorist organization ("FTO") based in Iraq, which has been responsible for numerous terrorist attacks against the United States and other targets. AL-SAADI has also furthered the related terrorist goals of the Islamic Revolutionary Guard Corps ("IRGC"), an Iranian military and counterintelligence agency under the authority of Iran's Supreme Leader that is also a U.S. designated FTO.

3. During this time, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, has served as a commander of Kata'ib Hizballah, maintained close ties with senior leaders of that terrorist organization and the IRGC, and, following U.S. airstrikes killing certain of

those terrorist leaders, has directed other individuals to exact retribution by killing U.S. citizens and U.S. political leaders. AL-SAADI has also operated as a propagandist for the terrorist organizations, using online platforms and social media channels to disseminate calls for violence against the United States. In the last several months, AL-SAADI has helped plan and direct at least 20 attacks and attempted attacks across Europe and the United States on behalf of terrorist organizations, including, as described further below, a plot to attack a synagogue in New York, New York earlier this year.

IRGC and Kata'ib Hizballah

4. Since its inception more than 45 years ago, the IRGC has engaged in terrorist activity around the world, including plotting to kill and killing U.S. citizens, and has played a central role in Iran becoming the world's foremost state sponsor of terrorism. The IRGC supports the lethal activities and shared terrorist goals of several Iranian proxy organizations, including Kata'ib Hizballah, Hizballah, and other terrorist groups, which receive training, funding, and weapons from the IRGC, including through the IRGC Quds Force ("IRGC-QF").[1] The IRGC-QF is the IRGC's external operations force and the Government of Iran's primary arm for executing its policy of supporting terrorist and insurgent groups. Iran and the IRGC use these and other terrorist and paramilitary proxies in the region to take lethal action and to carry out operations against the United States and its allies. For this and other conduct, since in or about April 2019, the IRGC has been designated as an FTO by the United States.

5. Kata'ib Hizballah is an Iraq-based Shia Islamic terrorist group. Kata'ib Hizballah has received extensive training, funding, logistical support, weapons, intelligence, and lethal support from the IRGC-QF. Kata'ib Hizballah, which is based in Iraq, is closely related, and has

[1] Hizballah is a Lebanon-based Shia Islamic terrorist organization founded in the early 1980s with support from Iran and has been a U.S. designated FTO since in or about October 1997.

ideological ties, to Hizballah, which is based in Lebanon. Both groups share the same ideology and goals and are part of Iran's "Axis of Resistance"—the term used for Iran's efforts, dating back to the 1979 Islamic Revolution and taken forward by the IRGC-QF, to engage proxies, such as Kata'ib Hizballah and Hizballah, to fight on behalf of Iran in return for funding, arms, military training, and intelligence support. Since in or about 2009, Kata'ib Hizballah has been designated as an FTO by the United States.

AL-SAADI's Roles in the IRGC and Kata'ib Hizballah

6. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, has furthered the terrorist goals of Kata'ib Hizballah and the IRGC, both designated FTOs, since at least in or about 2017. As a commander of Kata'ib Hizballah with close ties to the IRGC, AL-SAADI has been directly involved in those organizations' terrorist activity and operations, including by communicating with senior IRGC leadership about military decisions, directing attacks on U.S. interests by other members of Kata'ib Hizballah, and using propaganda on behalf of both terrorist organizations to call for violence against U.S citizens and interests. In those roles, AL-SAADI has worked with U.S.-designated terrorist leaders, including Esmail Qaani, the commander of the IRGC-QF, and Naim Qassem, the Secretary General of Hizballah.

7. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, also worked closely with Qasem Soleimani and Abu Mahdi al-Muhandis, the former leaders of the IRGC-QF and Kata'ib Hizballah, respectively, before they were killed in a U.S. airstrike in or about 2020. Following the deaths of Soleimani and al-Muhandis, AL-SAADI has repeatedly incited violence against Americans and the United States and has publicly published many such calls for violence on his social media accounts. For example, in or about 2020, AL-SAADI published, among others, images of: the U.S. capital reduced to rubble projected against the faces

of Soleimani and al-Muhandis, with the text "our revenge for the martyred leaders is ongoing. No negotiations with the occupier"; and an individual dressed in uniform sitting next to an AK-47 rifle, holding a picture of Soleimani and al-Muhandis, with the caption, "I will leave social media and turn off all my phones until the American enemy is defeated [--] victory or martyrdom."[2] Also in or about 2020, AL-SAADI published an image of President Trump with a target symbol on his face, with the caption, "The Islamic Republic of Iran will never forget the assassination of Martyr General Qassem Soleimani and will inevitably deliver a similar blow to the Americans." AL-SAADI has issued similar calls for retribution on Americans and threats to U.S. officials.

8. More recently, in or about January 2026, as described in detail below, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, communicated with a Kata'ib Hizballah member about waging jihad in support of Iran.

The European Terrorist Attacks

9. On or about February 28, 2026, the United States and Israel launched a large-scale military attack against Iran (the "Iranian Military Conflict"). Iran's Supreme Leader Ayatollah Ali Khamenei was killed in the initial strikes. Iran launched its own offensive against the United States and Israel, including by mobilizing Kata'ib Hizballah and other IRGC proxies around the world, to attack U.S. and Israeli interests.

10. Since the Iranian Military Conflict began, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, has publicly called on others to attack American and Israeli interests, and to kill Americans and Israelis. As part of that mobilization, on or about February 28, 2026, AL-SAADI posted the following message on one of his social media accounts: "Do not abandon the blood of your Imam of the time, oh Shiites of Iraq. Kill everyone who supports

[2] Some of the information recounted herein is based on draft translations of statements in Arabic, which are subject to revision.

America and Israel. Do not leave any of them remaining. Civil and military targets, as well as voices of discord, kill them everywhere." On or about March 7, 2026, AL-SAADI also posted a public message online, titled "Shadow soldiers," which appeared to call to action terrorist cells: "To all jihadens people in weast ,east [sic] earth…Its permission to all silent cells (R362 – C357 – A351) For work."

11. A few days later, starting on or about March 9, 2026, the first of approximately 18 terrorist attacks in Europe against U.S. and Israeli interests (the "European Terrorist Attacks") was carried out on behalf of and in coordination with Kata'ib Hizballah and other U.S. designated FTOs, including under the command of MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, as described below. In an apparent effort to conceal their involvement, Kata'ib Hizballah and the related FTOs carried out the attacks using a purportedly new terrorist group with the pseudonym Harakat Ashab al-Yamin al-Islamiya.

12. On or about March 9, 2026—the day of the first of the European Terrorist Attacks—MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, posted on one of his social media accounts a message with Harakat Ashab al-Yamin al-Islamiya's logo, calling on "warriors of Islam" to engage in "jihad."

13. From on or about March 9, 2026, up until on or about April 29, 2026, Harakat Ashab al-Yamin al-Islamiya claimed responsibility for the following attacks on civilians, including a dual U.S.-British citizen:

a. An explosives attack on or about March 9, 2026, against a synagogue in Liège, Belgium;

b. An arson attack on or about March 13, 2026, against a synagogue in Rotterdam, Netherlands;

c. An explosives attack on or about March 14, 2026, against a Jewish school in Amsterdam, Netherlands;

d. An explosives attack on or about March 15, 2026, against a location of the Bank of New York Mellon, an American bank, in Amsterdam, Netherlands;

e. An arson attack carried out by three masked individuals on or about March 23, 2026, against four Hatzalah Ambulances in London, United Kingdom[3];

f. An attack carried out on or about March 28, 2026, by two individuals who attempted to place an improvised explosive device at the building for Bank of America, an American bank, in Paris, France;

g. An attempted explosives attack on or about April 3, 2026, against a pro-Israel organization in Nijerk, Netherlands;

h. An explosives attack using pyrotechnic devices on or about April 10, 2026, against an Israeli restaurant in Munich, Germany;

i. An arson attack on or about April 12, 2026, against a synagogue in Skopje, North Macedonia;

j. Two arson attacks on or about April 15, 2026, in London, United Kingdom, against a synagogue and a media organization;

k. An attempted attack on or about April 16, 2026, against the Israeli Embassy in London, United Kingdom, using two drones that Harakat Ashab al-Yamin al-Islamiya later claimed were loaded with dangerous carcinogenic and radioactive materials;

l. An arson attack on or about April 17, 2026, against a Jewish charity organization in London, United Kingdom;

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[3] Hatzalah Ambulances is a volunteer ambulance service that serves primarily Orthodox Jewish communities.

m. An arson attack on or about April 18, 2026, against a synagogue in London, United Kingdom; and

n. A stabbing attack on or about April 29, 2026, in which the perpetrator stabbed and seriously injured two Jewish men—including a dual U.S.-British citizen—in London, United Kingdom.

14. Harakat Ashab al-Yamin al-Islamiya claimed responsibility for each of these attacks in propaganda videos that MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, helped create and publish online.

15. As described further below, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, participated in FaceTime calls with attackers as they were carrying out certain of the European Terrorist Attacks in real time, filmed those attacks as they were being conducted, helped create and disseminate propaganda videos of the attacks, discussed with a Kata'ib Hizballah member the need to engage in "psychological warfare" and the timing to carry out certain of the attacks, and warned the Kata'ib Hizballah member about an attacker who had been arrested.

AL-SAADI Attempted to Commit Terrorist Attacks in the United States

16. In addition to the European Terrorist Attacks, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, has attempted to carry out attacks in the United States.

17. Specifically, in or about April 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, contacted an individual in the United States ("SOI-1"), and asked if SOI-1 knew someone who could carry out attacks, and potentially kill individuals, in the United States. SOI-1 introduced AL-SAADI to another individual ("UC-1") as someone who

could carry out such attacks. Unbeknownst to AL-SAADI, UC-1 was an undercover law enforcement officer acting at the direction of law enforcement. In or about early April 2026, AL-SAADI directed and paid UC-1 to carry out terrorist attacks against U.S.-based targets. More specifically, AL-SAADI sent UC-1 targeting packages identifying three prominent Jewish institutions in the United States, including a synagogue in Manhattan, New York, and directed UC-1 to attack those locations, either by arson or through the use of explosives. These targeting packages included the locations of the targets and specific information about why they were targets of interest for AL-SAADI and his terrorist organizations. In exchange for UC-1's services, AL-SAADI said he would pay UC-1 a total of approximately $10,000 U.S. dollars for these attacks. On or about April 4, 2026, AL-SAADI paid UC-1 an initial installment of approximately $3,000 U.S. dollars in cryptocurrency, in anticipation of UC-1 conducting an attack on the New York synagogue. UC-1 did not carry out that or any other attacks.

18. In or about late April 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, again contacted SOI-1 to see if UC-1 could carry out a terrorist attack and kill or injure individuals in the United States. More specifically, on or about April 30, 2026, AL-SAADI called SOI-1 and asked if UC-1 could "attack," including by "burning, . . . or whatever he can," including "killing." SOI-1 responded that SOI-1 would talk to UC-1 about such an attack later that day. Shortly thereafter, AL-SAADI was detained while traveling abroad.

AL-SAADI's Post-Arrest Statements About the IRGC and Kata'ib Hizballah

19. On or about May 14, 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, was transferred into the custody of the Federal Bureau of Investigation ("FBI") and transported to the United States, where he was first brought to the Southern District of New York. When AL-SAADI was transferred into FBI custody, several electronic devices that

AL-SAADI had been traveling with, including an Apple iPhone (the "AL-SAADI Phone"), were also transferred into the custody of the FBI.

20. While in FBI custody en route to the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, waived his *Miranda* rights and voluntarily made statements to U.S. law enforcement agents. Among other things, AL-SAADI stated, in substance and in part, the following:

a. AL-SAADI was born in Tehran, Iran, but has lived the majority of his life in Iraq, and is a dual citizen of Iran and Iraq.

b. AL-SAADI identified himself a leader of "the resistance," which he explained encompasses the IRGC and its proxies, including Kata'ib Hizballah, Hizballah, and the Houthis.[4] AL-SAADI explained that there is no real distinction between those groups and that they are all part of "the resistance." AL-SAADI was in charge of media and psychological warfare, including against the United States, as well as strategy and military intelligence.

c. AL-SAADI is very close with the leadership of the IRGC. Prior to Soleimani's death, AL-SAADI was considered like a son to Soleimani and constantly traveled with him. AL-SAADI was supposed to be driving Soleimani to meet al-Muhandis the day that Soleimani and al-Muhandis were killed in a U.S. airstrike. AL-SAADI was also close with Khamenei. Approximately three days before the Iranian Military Conflict began and Khamenei was killed, AL-SAADI met with Khamenei in Iran and warned him about a potential U.S. strike against Iran.

d. AL-SAADI was involved in high-level discussions with IRGC leadership, including about the Iranian Military Conflict. For example, in or about April 2026,

[4] The Houthi movement is another U.S. designated FTO supported by the IRGC.

AL-SAADI met with Qaani about the "solution" to the Iranian Military Conflict. AL-SAADI also claimed he had the ability to "raise or lower the level of attacks."

e. As a result of his role handling media for the "resistance," AL-SAADI was also responsible for media for Harakat Ashab al-Yamin al-Islamiya. AL-SAADI explained that the propaganda videos of the European Terrorist Attacks were part of the "psychological warfare" that "the resistance" was waging against the United States, designed to instill fear and terror in civilians.

Evidence Recovered from AL-SAADI's Devices and Electronic Accounts

21. The AL-SAADI Phone and social media accounts used by MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, contain evidence of AL-SAADI's longstanding role supporting the IRGC, Kata'ib Hizballah, and Hizballah, as well as of his direct involvement in the planning, execution, and promotion of the European Terrorist Attacks.

Evidence of AL-SAADI's Roles in the IRGC and Kata'ib Hizballah

22. The AL-SAADI Phone and the online accounts of MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, contain videos and photos of AL-SAADI meeting with the leadership of the IRGC, Kata'ib Hizballah, and the Houthis; images glorifying the IRGC and Hizballah; and videos and photos reflecting AL-SAADI's own role as a commander in Kata'ib Hizballah, with access to machineguns and other dangerous weapons.

23. For example, the AL-SAADI Phone contains the following:

a. A video of MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, meeting with Soleimani and Akram 'Abbas al-Kabi (a U.S.-designated terrorist and one of the main operatives in Iraq of the IRGC-QF) in what appears to be an underground operations center. The room in which they are meeting is plastered with maps of the

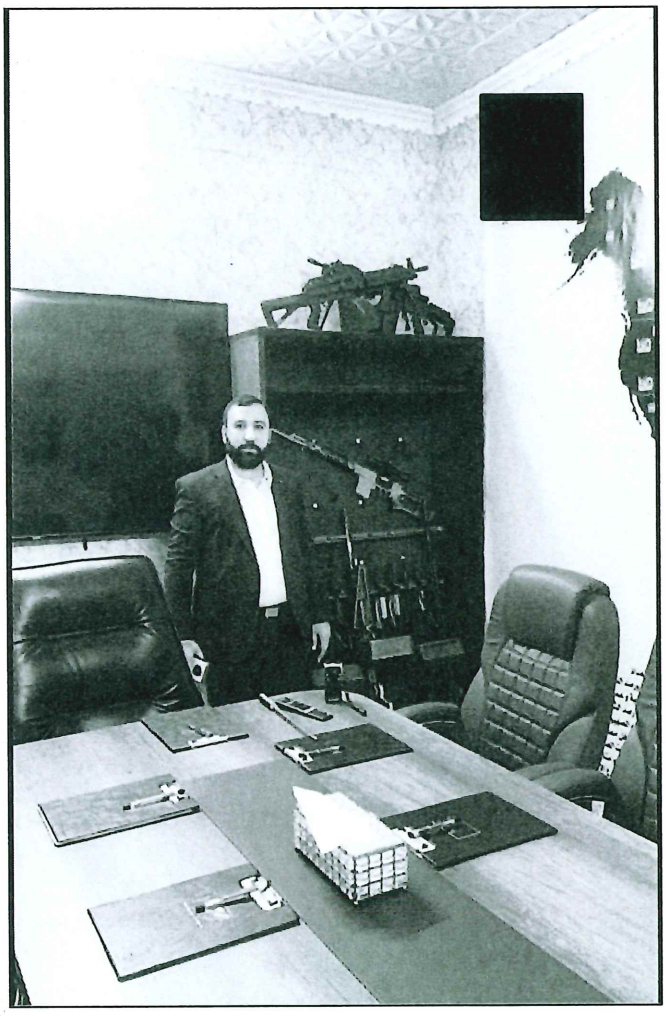
Aleppo province in northern Syria and contains various electronic equipment. Below are screenshots from the video, showing (i) from left to right, al-Kabi, Soleimani, and AL-SAADI together, and (ii) other individuals in the same room dressed in military uniforms:



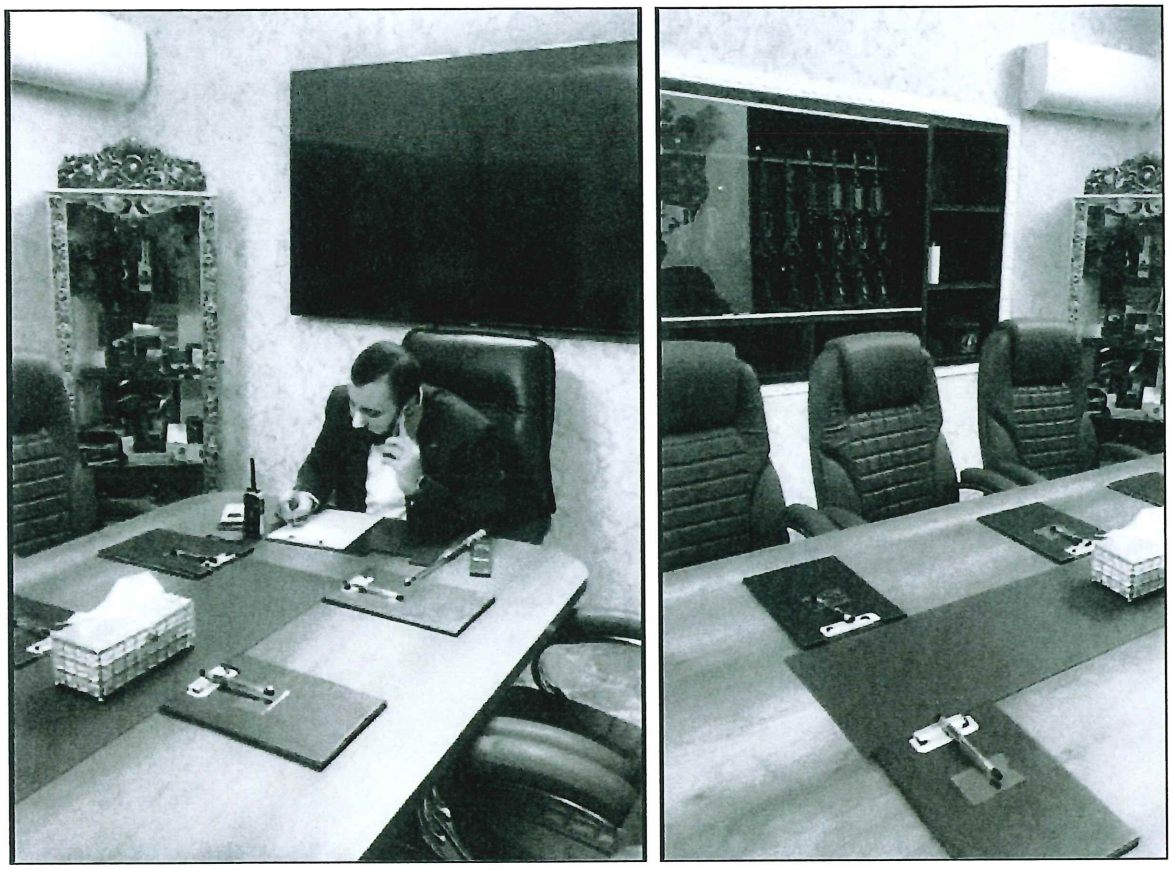


b. A photo, shown below, from on or about February 12, 2024, of AL-SAADI standing in front of an array of machineguns in a conference room that AL-SAADI, in his post-arrest interview, stated was located in a building that at the time was used for "military intelligence" for "the resistance." The room has a map on the wall of what appears to be the United

States accompanied by a list of "legitimate targets" (redacted here) identifying a number of prominent former and current U.S. officials:



c. A video from on or about February 12, 2024, of AL-SAADI sitting at the head of that conference room table in the same building for "military intelligence." Below are two screenshots from the video, the first of which shows AL-SAADI on his phone signing a document, and the second of which shows the contents of the other side of the conference room, including more machineguns, as well as a reflection of the map of the United States described above (*supra* ¶ 23(b)):



d. A photo, dated on or about March 9, 2024, shown below, of AL-SAADI in the same conference room, with another individual, and a caption in Arabic, which translates to: "Our guest was Haj Abu Idris al-Sharafi, the official in charge of the Ansar Allah (Houthi) file in Iraq." Haj Abu Idris al-Sharafi (also known as Ahmed al-Sharafi) is a Houthi military leader who serves as the primary representative and head of the official Houthi political and security office in Baghdad, Iraq. He is reportedly responsible for joint security operations by Houthi forces and Iran-backed militias in Iraq.



e. The AL-SAADI Phone also contains contact information for the "headquarters of Kata'ib Hizballah," which sent a message on an encrypted messaging application to AL-SAADI on or about February 27, 2026, the day before the Iranian Military Conflict began.

24. Similarly, a Snapchat account that belongs to MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, contains the following electronic evidence of AL-SAADI's role in Kata'ib Hizballah and its related Iranian proxy groups[5]:

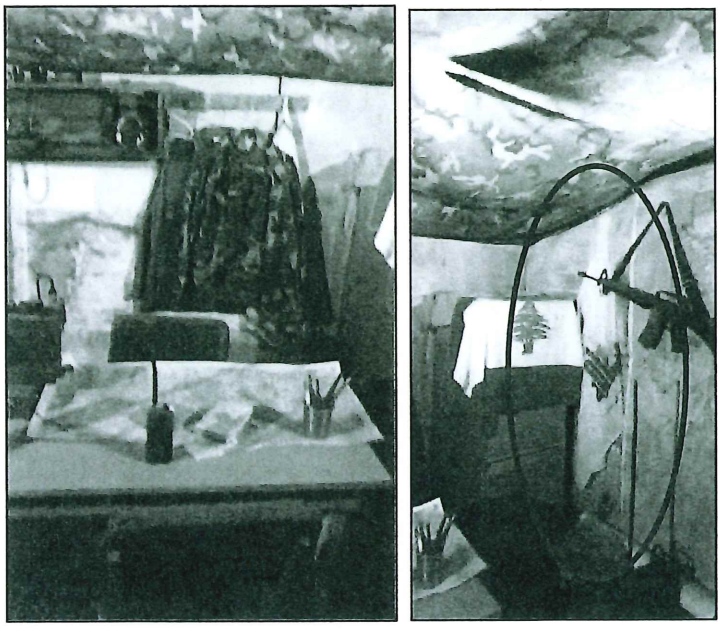
a. First, as noted above, AL-SAADI worked closely with Soleimani, the longtime commander of the IRGC-QF, prior to Soleimani's death in or about January 2020.

[5] AL-SAADI, in his post-arrest interview, acknowledged that this was his Snapchat account, which uses the display name "MOHAMMED AL SAADI"; features a photograph of AL-SAADI in the profile; and is registered to one of AL-SAADI's phone numbers, which phone number is registered to other social media accounts that belong to AL-SAADI.

AL-SAADI's Snapchat account contains numerous photographs of AL-SAADI with Soleimani, which AL-SAADI circulated in chats at various times, dating back to at least in or about 2017, including the following photograph:



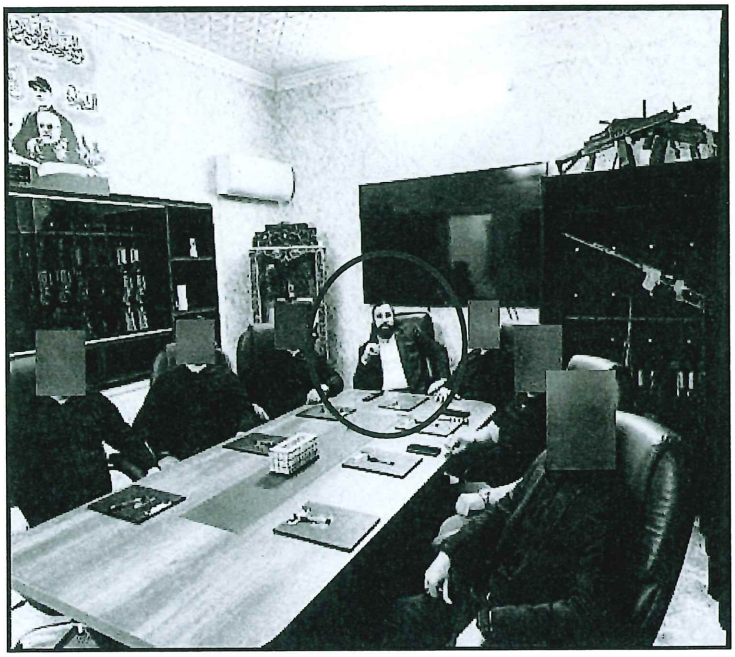
b. On or about April 19, 2018, AL-SAADI circulated in a chat a video, preceded by the caption "Central Command Headquarters," of what appears to be a military command center; below are two screenshots from the video, including a screenshot showing what appears to be a machinegun and the official Hizballah flag (both circled in red), next to the official flag of Lebanon (the red, white, and green flag), inside the command center:



c. In or about 2019, AL-SAADI circulated in a chat a photograph of what he described in the chat as Hizballah "camps," likely referring to camps where Hizballah trains its operatives:



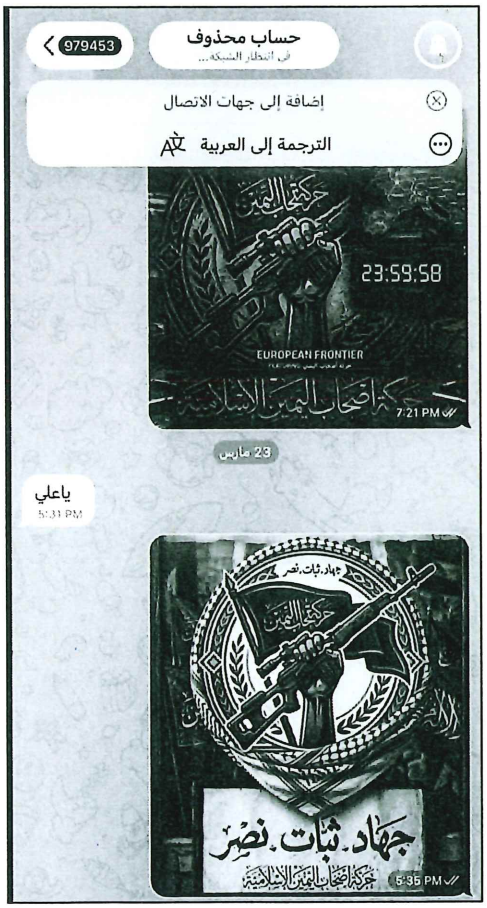
d. On or about April 29, 2024, AL-SAADI circulated in a chat the following photograph of himself (center, circled in red) and others sitting in a formal meeting room in the former "military intelligence" building for "the resistance" surrounded by machineguns:



Evidence of AL-SAADI's Role in the European Terrorist Attacks

25. The AL-SAADI Phone also contains evidence of the role that MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, had in the planning, execution, and promotion of the European Terrorist Attacks. For example:

a. On or about March 21, 2026, and on or about March 23, 2026, in a Telegram chat, AL-SAADI sent images of Harakat Ashab al-Yamin al-Islamiya's logo, including an image accompanied by a map of Europe and a clock appearing to depict a count-down of 24 hours below the map, with the caption "European Frontier[:] featuring [Movement of the Companions of the Right]." A photograph of the chat thread is shown below:

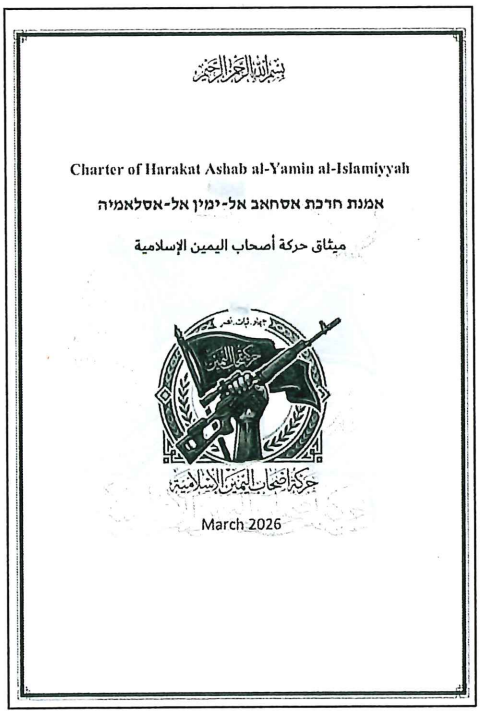


AL-SAADI had publicly posted the same image—of a clock appearing to depict a count-down of 24 hours—on his Telegram account approximately ten days earlier, on or about March 14, 2026;

the explosive attack against a Jewish school in Amsterdam, Netherlands, for which Harakat Ashab al-Yamin al-Islamiya claimed responsibility, occurred the next day, *see supra* ¶ 13(c).

b. On or about March 23, 2026, AL-SAADI, using Telegram, sent a contact saved in his phone for a China-based media company (the "China Media Contact") videos of the raw footage of the March 23, 2026 arson attack on Hatzalah Ambulances in London, United Kingdom, for which Harakat Ashab al-Yamin al-Islamiya claimed responsibility, *see supra* ¶ 13(e).

c. On or about March 25, 2026, AL-SAADI disseminated to others, using an encrypted messaging application, a document, dated March 2026, and entitled, "Charter of Harakat Ashab al-Yamin al-Islamiyyah," which contains, among other things, the following statement: "From today, we declare clearly: The United States, the Israeli Zionist regime, and anyone who cooperates with them at any level will not be secure." Below is a copy of the cover page of this charter document recovered from the AL-SAADI Phone:


بسم الله الرحمن الرحيم

Charter of Harakat Ashab al-Yamin al-Islamiyyah

אמנת חרכת אסחאב אל-ימין אל-אסלאמיה

ميثاق حركة أصحاب اليمين الإسلامية

March 2026

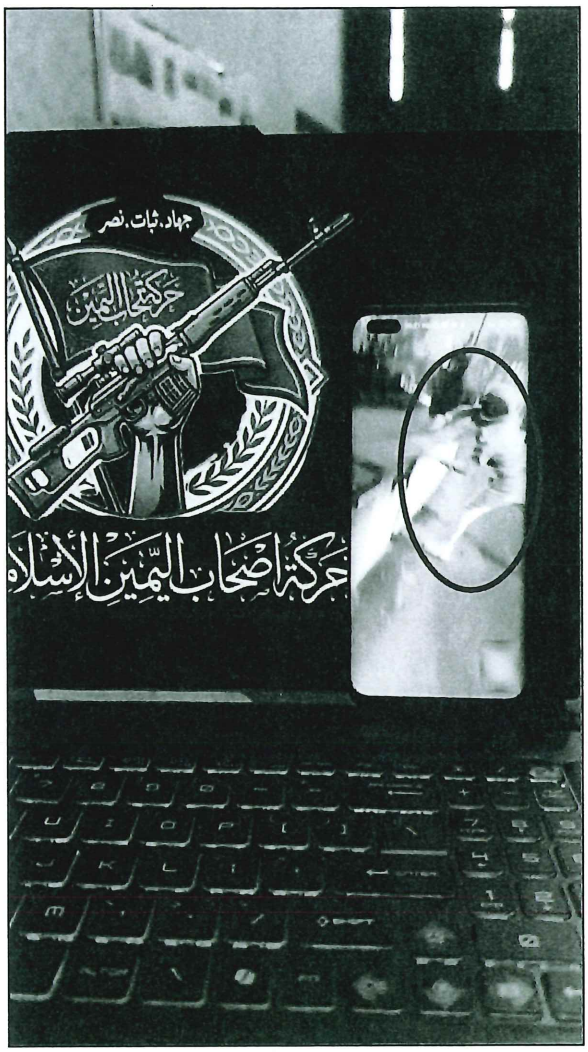
d. Also on or about March 25, 2026, AL-SAADI, using an encrypted messaging application, sent another individual numerous documents on letterhead for Harakat Ashab al-Yamin al-Islamiya regarding certain of the European Terrorist Attacks. One of those documents, for example, described the March 15, 2026 explosives attack against the Bank of New York Mellon building in Amsterdam, Netherlands.

e. The AL-SAADI Phone also contains videos of many of the European Terrorist Attacks, discussed above, *see supra* ¶ 13, including videos that AL-SAADI recorded of the attacks in real time. For example:

i. AL-SAADI exchanged messages and information on a Telegram text chain about certain of the European Terrorist Attacks. On or about March 11, 2026, two days after the attack on the synagogue in Liège, Belgium for which Harakat Ashab al-Yamin al-Islamiya claimed responsibility, AL-SAADI received videos and location information about the synagogue on Telegram. The videos appear to contain raw footage of the attack, including one video that captured the moment the explosion went off inside the synagogue. On or about March 14, 2026, in the same thread on Telegram, AL-SAADI exchanged two videos of the explosives attack that occurred that day on a Jewish school in Amsterdam, Netherlands, including a video containing raw footage of the attack.

ii. On or about April 15, 2026, using an encrypted messaging application, AL-SAADI sent another individual videos of a FaceTime video call that AL-SAADI was having with at least two people who were in the process of carrying out one of the European Terrorist Attacks in London against a media organization. Below are screenshots from the video that AL-SAADI sent of his FaceTime call with the attackers. As in part depicted below, AL-SAADI's phone appears to be propped up against a laptop with the Harakat Ashab al-Yamin al-

Islamiya logo as its background. On the FaceTime video, an individual appears to be actively engaged in the arson attack (circled in red below):

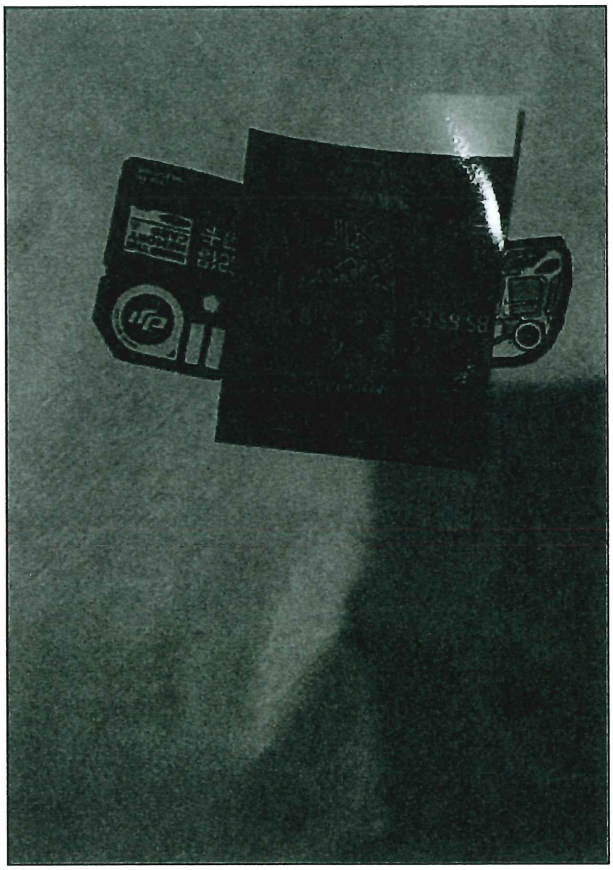


Relatedly, on or about April 18, 2026, AL-SAADI sent an individual videos of an attack on a London synagogue that AL-SAADI recorded, followed by an image of the Harakat Ashab al-Yamin al-Islamiya logo.

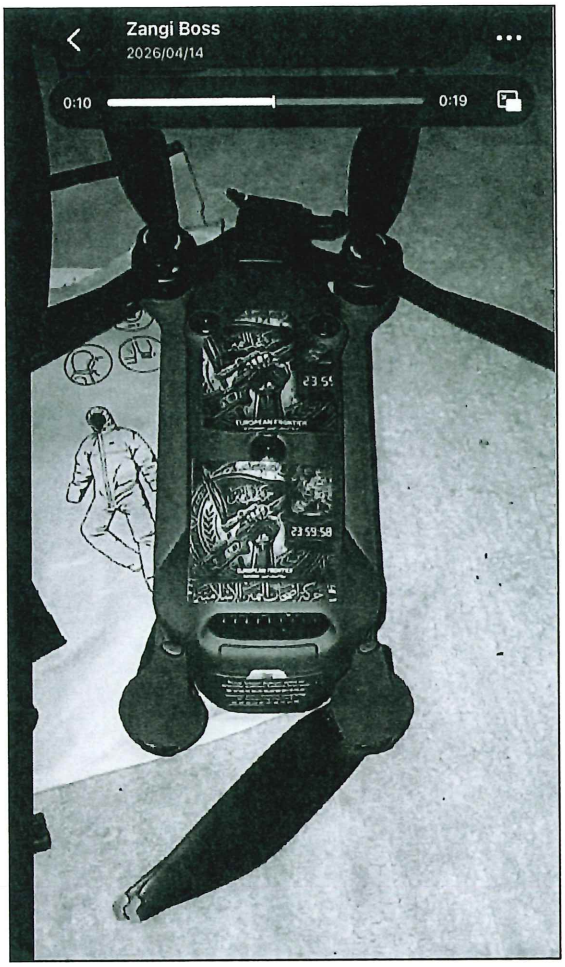
iii. On or about April 14, 2026, an individual, using an encrypted messaging application, sent AL-SAADI videos of two men dressed in hazmat suits, with a sticker of the Harakat Ashab al-Yamin al-Islamiya logo taped to each suit. The men appear to be in a room with drone equipment, including a drone with what appears to be two vials of white powder

attached to it. The content of these videos is consistent with the propaganda video that Harakat Ashab al-Yamin al-Islamiya posted on Telegram on or about April 16, 2026, in which it claimed that its members had attacked the Israeli Embassy using two drones that were loaded with dangerous carcinogenic and radioactive materials. Specifically, below are screenshots from the videos that AL-SAADI received of the men in hazmat suits standing next to drone equipment, which is labeled with the Harakat Ashab al-Yamin al-Islamiya logo. In the middle of the drone equipment are the vials of white powder:

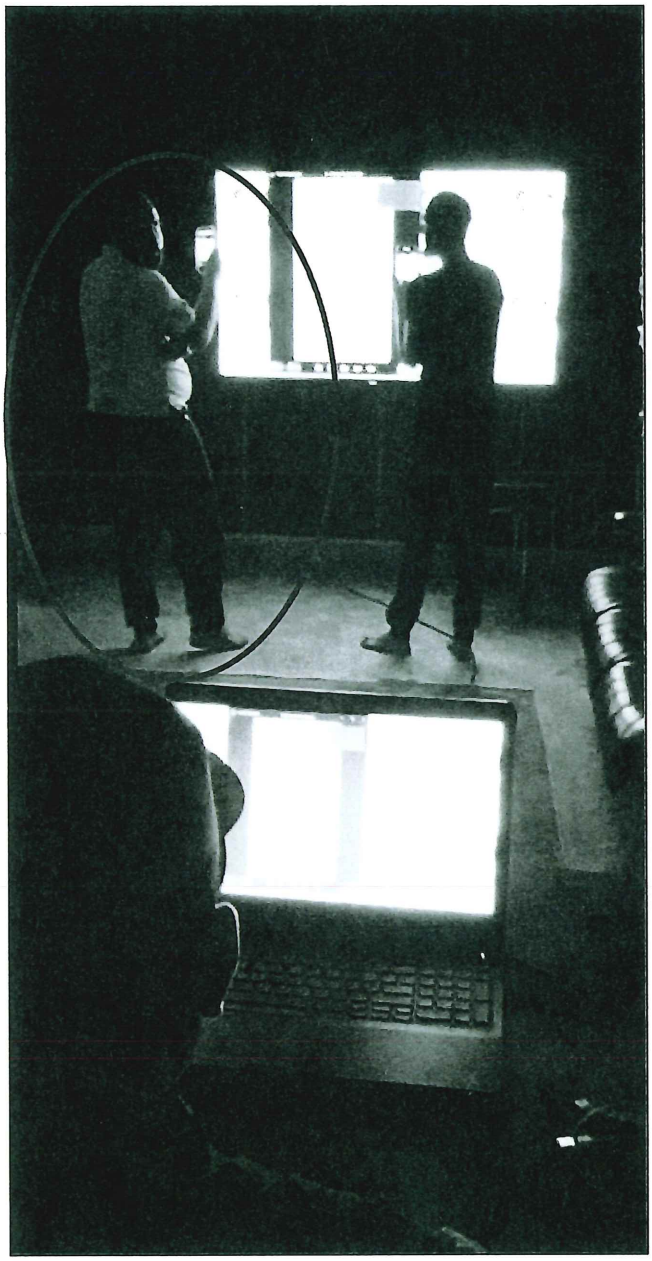








iv. Also on the AL-SAADI Phone is a video from on or about April 18, 2026—that is, the day of an arson attack against a synagogue in London—of AL-SAADI in a dark room with approximately three or four other men. In the video, the men are on a FaceTime video call with one of the individuals who was about to carry out the London attack, and the FaceTime call is projected onto a large screen against the background of the Harakat Ashab al-Yamin al-Islamiyah logo. AL-SAADI is recording the attack through that FaceTime video call. In the video, one of the men, in English, instructs the individual on the other end of the call to execute the arson attack, directing that individual to take a lighter and "light one in your hand," "light it" and "throw the fourth one." Below is a screenshot from the video, with AL-SAADI, filming the attack, circled in red:



f. Evidence on the AL-SAADI Phone further underscores the fact that the European Terrorist Attacks were conducted on behalf of and in coordination with Kata'ib Hizballah and related terrorist organizations, and that Harakat Ashab al-Yamin al-Islamiya was just a front of those organizations. For example:

i. A primary contact with whom AL-SAADI communicated about the European Terrorist Attacks and related events is saved in the AL-SAADI phone as "Haji Musa Kata'ib Hizballah" (the "Kata'ib Hizballah Musa Contact").

ii. On or about January 25, 2026, the Kata'ib Hizballah Musa Contact sent AL-SAADI an image of missiles being fired from Iran with a message directing "our mujahideen brothers in the east and west of the earth . . . to prepare for a comprehensive war in support of the Islamic Republic of Iran," to which AL-SAADI replied, "well done." The next day, on or about January 26, 2026, the Kata'ib Hizballah Musa Contact sent AL-SAADI another image with a similar message from the Secretary General of the Islamic Resistance, Kata'ib Hizballah, Haj Abu Hussein al-Hamidawi, imploring "our dear mujahideen brothers to prepare themselves on the ground for this, and to settle themselves for one of the two best outcomes, especially if the esteemed religious authorities declare jihad to wage this holy war, and whatever rulings or acts of jihad entail it, rising to the level of martyrdom operations, in defense of the people of Islam and its community. (So fight the disbelievers, for they have no oaths)."

iii. Approximately one month later, the Iranian Military Conflict began.

iv. Since then, from at least on or about March 7, 2026, to at least on or about May 1, 2026, AL-SAADI and the Kata'ib Hizballah Musa Contact have exchanged messages regarding Harakat Ashab al-Yamin al-Islamiya and the European Terrorist Attacks.

v. For example, on or about March 8, 2026, the Kata'ib Hizballah Musa Contact and AL-SAADI exchanged a message with the Harakat Ashab al-Yamin al-Islamiya logo; in the chat, AL-SAADI explained that "[t]he most important thing is that within the psychological warfare, they [referring to Harakat Ashab al-Yamin al-Islamiya's messages] are useful," and that "anything that distracts the enemy is useful."

vi. On or about March 8, 2026, AL-SAADI, in a text message to the Kata'ib Hizballah Musa Contact, wrote that AL-SAADI had a "poll on Belgium" that was "very strong," and that it was "really time now." Shortly thereafter, and as noted above, *see supra* ¶ 13(a), on or about March 9, 2026, there was a terrorist attack in Belgium, for which Harakat Ashab al-Yamin al-Islamiya claimed responsibility.

vii. On or about March 21, 2026, AL-SAADI sent the Kata'ib Hizballah Musa Contact a propaganda video that Harakat Ashab al-Yamin al-Islamiya had posted on its group Telegram account on or about March 20, 2026, in which Harakat Ashab al-Yamin al-Islamiya threatened to attack a Bank of America building in Paris, France; as discussed above, *see supra* ¶ 13(f), such an attack did occur on or about March 28, 2026. On or about March 28, 2026, AL-SAADI sent the Kata'ib Hizballah Musa Contact the following message about that attack: "Urgent: A person who tried to detonate an explosive device at Bank of America in Paris has been arrested."

viii. On or about April 29, 2026—the day two men were stabbed in London in an attack for which Harakat Ashab al-Yamin al-Islamiya claimed responsibility, *see supra* ¶ 13(n), AL-SAADI instructed the Kata'ib Hizballah Musa Contact to "post it in the news[,] important," referring to video footage of that attack, including a propaganda video that Harakat Ashab al-Yamin al-Islamiya posted on Telegram in which it claimed responsibility for that attack. That same day, AL-SAADI sent the following message to the Kata'ib Hizballah Musa Contact: "If God grants us success tonight, there will be a shooting at a restaurant."

STATUTORY ALLEGATIONS

26. From at least in or about 2017, up to and including in or about May 2026, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others

known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to a foreign terrorist organization, namely, Kata'ib Hizballah, which was designated by the U.S. Secretary of State as a foreign terrorist organization on or about July 2, 2009, pursuant to Section 219 of the Immigration and Nationality Act, and is currently designated as such as of the date of the filing of this Indictment.

27. It was a part and an object of the conspiracy that MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, would and did knowingly provide Kata'ib Hizballah, with material support and resources, including property, services, lodging, facilities, weapons, personnel, training, facilities, explosives, and transportation, knowing that Kata'ib Hizballah was a designated terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that Kata'ib Hizballah engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that Kata'ib Hizballah engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(C), (d)(1)(D), (d)(1)(E), and (d)(1)(F), and 3238.)

COUNT TWO
(Conspiracy to Provide Material Support to a Foreign Terrorist Organization)

The Grand Jury further charges:

28. The allegations contained in paragraphs 1 through 25 of this Indictment are incorporated as though fully set forth herein.

29. From at least in or about 2019, up to and including in or about May 2026, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to a foreign terrorist organization, namely, the Islamic Revolutionary Guard Corps ("IRGC"), which was designated by the U.S. Secretary of State as a foreign terrorist organization on or about April 15, 2019, pursuant to Section 219 of the Immigration and Nationality Act, and is currently designated as such as of the date of the filing of this Indictment.

30. It was a part and an object of the conspiracy that MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, would and did knowingly provide the IRGC, with material support and resources, including property, services, lodging, facilities, weapons, personnel, training, facilities, explosives, and transportation, knowing that the IRGC was a designated terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that the IRGC engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that the IRGC engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(C), (d)(1)(D), (d)(1)(E), and (d)(1)(F), and 3238.)

COUNT THREE
(Conspiracy to Provide Material Support for Acts of Terrorism)

The Grand Jury further charges:

31. The allegations contained in paragraphs 1 through 25 of this Indictment are incorporated as though fully set forth herein.

32. From at least in or about February 2026, up to and including in or about May 2026, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including property, services, lodging, facilities, weapons, personnel, training, facilities, explosives, and transportation, knowing and intending that they were to be used in preparation for and in carrying out one or more of the following violations of Title 18, United States Code: (a) attempting and conspiring to murder nationals of the United States, in violation of Title 18, United States Code, Section 2332(b), (b) attempting to commit acts of terrorism transcending national boundaries, in violation of Title 18, United States Code, Section 2332b, (c) bombing and conspiring to bomb a place of public use, in violation of Title 18, United States Code, Section 2332f, and (d) attempting to destruct property by means of fire or explosive, in violation of Title 18, United States Code, Section 844(i).

(Title 18, United States Code, Sections 2339A and 3238.)

COUNT FOUR
(Provision of Material Support for Acts of Terrorism)

The Grand Jury further charges:

33. The allegations contained in paragraphs 1 through 25 of this Indictment are incorporated as though fully set forth herein.

34. From at least in or about February 2026, up to and including in or about May 2026, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, who was first brought to and arrested in the Southern District of New York, knowingly and intentionally provided and attempted to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including, among other things, property, services, lodging, facilities, weapons, personnel, training, facilities, explosives, and transportation, knowing and intending that they were to be used in preparation for and in carrying out one or more of the following violations of Title 18, United States Code: (a) attempting and conspiring to murder nationals of the United States, in violation of Title 18, United States Code, Section 2332(b), (b) attempting to commit acts of terrorism transcending national boundaries, in violation of Title 18, United States Code, Section 2332b, (c) bombing and conspiring to bomb a place of public use, in violation of Title 18, United States Code, Section 2332f, and (d) attempting to destruct property by means of fire or explosive, in violation of Title 18, United States Code, Section 844(i).

(Title 18, United States Code, Sections 2339A, 2, and 3238.)

COUNT FIVE
(Attempted Acts of Terrorism Transcending National Boundaries)

The Grand Jury further charges:

35. The allegations contained in paragraphs 1 through 25 of this Indictment are incorporated as though fully set forth herein.

36. From at least in or about February 2026, up to and including in or about May 2026, in Iraq, the Southern District of New York, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, who was first brought to and arrested in the Southern District of New York, did knowingly attempt to (a) kill, kidnap, maim, commit an assault resulting in serious bodily injury, and assault with a dangerous weapon any person in the United States, in violation of the laws of the State of New York and of the United States, that is, New York Penal Law Sections 110, 120.05(1) & (2), and 120.10(1), 125.25(1), and (b) create a substantial risk of serious bodily injury to any other person by destroying and damaging any structure, conveyance, and other real and personal property within the United States, in violation of the laws of the State of New York and of the United States, that is, New York Penal Law Sections 110, 150.10, 150.15 and 150.20, and Title 18, United States Code, Sections 844(i), 2339B and 2, in circumstances involving conduct transcending national boundaries, and in which one or more facilities of interstate and foreign commerce were used in furtherance of the offense, to wit, cellular telephones and the internet.

(Title 18, United States Code, Sections 2332b(a)(1)(A), (a)(1)(B), (a)(2), (b)(1)(A), (b)(1)(B), 3238, and 2.)

COUNT SIX
(Conspiracy to Bomb a Place of Public Use)

The Grand Jury further charges:

37. The allegations contained in paragraphs 1 through 25 of this Indictment are incorporated as though fully set forth herein.

38. From at least in or about February 2026, up to and including in or about May 2026, in the Southern District of New York and elsewhere, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other unlawfully to deliver, place, discharge, and detonate an explosive and other lethal device in, into, and against a place of public use, a government facility, a public transportation system, and an infrastructure facility, with the intent to cause death and serious bodily injury, and with the intent to cause extensive destruction of such a place, facility, and system, and where such destruction resulted in and was likely to result in major economic loss, and where the offense took place both inside and outside the United States and (i) the offense was committed in an attempt to compel the United States to do or abstain from doing any act, and (ii) a victim of the offense was a national of the United States.

Overt Acts

39. In furtherance of the conspiracy and to effect the illegal object thereof, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and his co-conspirators, committed and caused to be committed the following attack and attempted attacks, to compel the United States to stop military attacks against Iran and the IRGC: on or about March 15, 2026, AL-SAADI and others carried out an attack involving explosives against the Bank of New York

Mellon building in Amsterdam, Netherlands; on or about March 28, 2026, AL-SAADI and others attempted to attack the Bank of America building in Paris, France, using an improvised explosive device; and in or about April 2026, AL-SAADI and others attempted to carry out a terrorist attack against Jewish institutions in the United States.

(Title 18, United States Code, Sections 2332f(a), (b)(1)(B), (b)(2)(B), (b)(2)(D), and 3238.)

COUNT SEVEN
(Attempted Destruction of Property by Means of Fire or Explosive)

The Grand Jury further charges:

40. The allegations contained in paragraphs 1 through 25 of this Indictment are incorporated as though fully set forth herein.

41. In or about April 2026, in the Southern District of New York and elsewhere, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, who has been first brought to and arrested in the Southern District of New York, willfully and knowingly did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, a building, vehicle, and other real and personal property used in interstate and foreign commerce, and in any activity affecting interstate and foreign commerce, to wit, in or about April 2026, AL-SAADI attempted to attack numerous Jewish sites in the United States, including by means of fire and an explosive.

(Title 18, United States Code, Sections 844(i), 2, and 3238.)

COUNT EIGHT
(Financing Terrorism)

The Grand Jury further charges:

42. The allegations contained in paragraphs 1 through 25 of this Indictment are incorporated as though fully set forth herein.

43. From at least on or about February 2026, up to and including in or about May 2026, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, who has been first brought to and arrested in the Southern District of New York, did unlawfully and willfully provide and collect funds, by any means, directly and indirectly, and attempt to do so, with the intention and the knowledge that such funds were to be used, in full or in part, to carry out a terrorist act, to wit, any act intended to cause death and serious bodily injury to a civilian, and to any other person not taking an active part in hostilities in a situation of armed conflict, the purpose of which, by its nature and context, was to intimidate a population, and to compel a government to do and to abstain from doing any act, and where the object of such offense was directed toward and resulted in attempted terrorist attacks against nationals of the United States and any person or property within the United States.

(Title 18, United States Code, Sections 2339C(a)(1)(B), (a)(2), and (b)(2)(C)(ii), (iii), 2, and 3238.)

FORFEITURE ALLEGATIONS

44. As a result of committing the terrorism offenses charged in Counts One, Two, Three, Four, Five, Six, and Eight of this Indictment, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 981(a)(1)(G) and 2332b(g)(5), and Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to the commission of said offenses; any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offenses; any and all assets, foreign and domestic, acquired or maintained with the intent and for

the purpose of supporting, planning, conducting or concealing said offenses; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offenses, including but not limited to a sum of money in United States currency representing the total amount of proceeds traceable to the commission of the offenses and/or the defendant's assets.

45. As a result of committing the offense alleged in Count Seven of this Indictment, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any and all property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense, and pursuant to Title 18, United States Code, Section 844(c), any and all explosive materials involved or used or intended to be used in the offense.

Substitute Assets Provision

46. If any of the above-described forfeitable property, as a result of any act or omission of MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Sections 853; and
Title 28, United States Code, Section 2461(c).)

[redacted] 5/28/26

FOREPERSON

Jay Clayton

JAY CLAYTON
United States Attorney