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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, Defendants.	**SUPERSEDING INDICTMENT** S1 26 Cr. 220

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. Since in or about early 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, worked with MOHSEN MOHAJERI and MOHAMMED ALI AL-HASSANI, the defendants, to commit numerous terrorist attacks and attempted attacks in Europe and the United States on behalf of an Iran-aligned terrorist network that included the Islamic Revolutionary Guard Corps ("IRGC") and Kata'ib Hizballah, both of which are Foreign Terrorist Organizations ("FTOs"). Most recently, in approximately September 2026, AL-HASSANI orchestrated a terrorist plot against a British Royal Air Force Base ("RAF Fairford") in Fairford, United Kingdom (the "RAF Fairford Terrorist Plot"), which at the time, housed U.S. military aircraft and personnel. AL-HASSANI and MOHAJERI, both of whom were in Iran at the time of

the RAF Fairford Terrorist Plot, relied on a network of contacts in the United Kingdom, while AL-SAADI, who was imprisoned and awaiting trial on pending terrorism charges in the Southern District of New York, attempted to coordinate with AL-HASSANI and MOHAJERI from jail by passing them coded messages through third parties.

AL-SAADI's Indictment and Arrest

3. On or about May 28, 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, was charged in the Southern District of New York in an eight-count indictment (the "Indictment") for working with and on behalf of FTOs, including the IRGC and Kata'ib Hizballah. *See United States v. Mohammad Baqer Saad Dawood Al-Saadi*, 26 Cr. 220 (CM). In addition, the indictment details AL-SAADI'S involvement in planning and promoting approximately 18 terrorist attacks in Europe (the "European Terrorist Attacks"), for which a purportedly new terrorist group with the pseudonym Harakat Ashab al-Yamin al Islamaya ("HAYI") claimed responsibility, and attempting to bomb a synagogue in New York, between in or about March and April 2026.

4. Of the approximately 18 terrorist attacks in the spring of 2026 for which HAYI claimed responsibility in Europe, approximately seven of those attacks—the most of any European country—took place in the United Kingdom. The attacks in London included arson attacks involving Hatzalah ambulances, synagogues, and a Jewish charity organization; an attempted attack on the Israeli Embassy, using two drones that HAYI later claimed were loaded with dangerous carcinogenic and radioactive materials; and a stabbing attack that seriously injured two Jewish men—including a dual U.S.-U.K. citizen.

IRGC and Kata'ib Hizballah

5. The IRGC is an Iranian military and counterintelligence agency under the authority of Iran's Supreme Leader. 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"). 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. In 2019, the U.S. Department of State designated the IRGC, including the IRGC-QF, as an FTO.

6. Kata'ib Hizballah is an Iraq-based Shia Islamic terrorist group whose goal is to establish an Iran-aligned government in Iraq, expel American forces from Iraq, and advance the regional and international interests of Iran in Iraq and the region. Kata'ib Hizballah, which was designated as an FTO in 2009, has received extensive training, funding, logistical support, weapons, and intelligence from the IRGC-QF. The IRGC—through the IRGC-QF—has supported the lethal activities of Kata'ib Hizballah, Hizballah, and other terrorist groups. Among its activities, the IRGC plots and conducts attack operations outside Iran targeting, among others, U.S. citizens residing abroad and in the United States. The IRGC has publicly stated its desire and intention to conduct operations targeting those perceived to be enemies of the Iranian regime, including Americans. Iran and the IRGC use other terrorist and paramilitary proxies in the region to take lethal action and to carry out operations against the United States and its allies. These

proxies include Kata'ib Hizballah and other Iran-aligned militia groups based in Iraq, as well as Hizballah, which receive training, funding, and weapons from the IRGC.

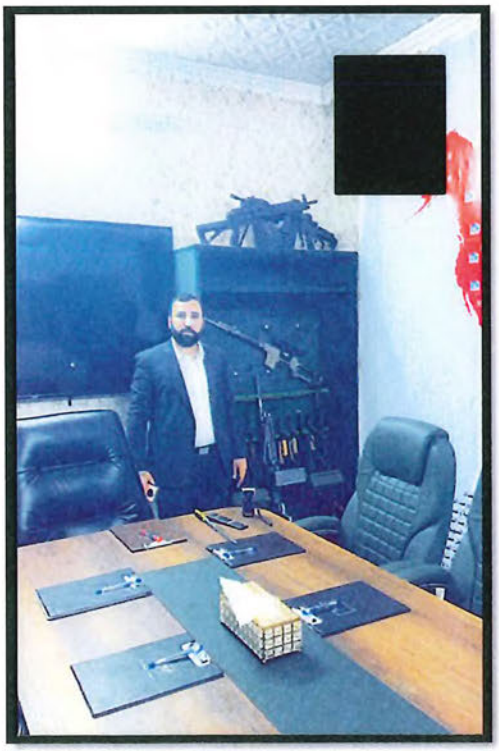
7. On or about February 28, 2026, the United States and Israel launched a large-scale military attack against Iran (the "Iranian Military Conflict"). Iran's Supreme Leader Ayatollah Ali Khamenei was killed in the initial strikes. Iran launched its own offensive against the United States and Israel, including by mobilizing Kata'ib Hizballah and other IRGC terrorist proxies around the world, to attack U.S. and Israeli interests. HAYI has carried out and claimed responsibility for numerous terrorist attacks against civilians and civilian targets in Europe on behalf of and in coordination with Kata'ib Hizballah, the IRGC, and other FTOs.

Al-Saadi's Roles in the IRGC and Kata'ib Hizballah

8. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, is a commander in Kata'ib Hizballah, acting in concert with the IRGC. AL-SAADI has been directly involved in those FTOs' terrorist activity and operations, including by communicating with senior IRGC leadership about military decisions, discussing attacks on U.S. interests with other members of Kata'ib Hizballah, coordinating and directing terrorist attacks, and promoting propaganda on behalf of the IRGC and Kata'ib Hizballah to encourage violence against U.S citizens and interests. In those roles, since at least in or about 2017, 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. AL-SAADI also worked closely with 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 their deaths, AL-SAADI repeatedly sought to incite violence against Americans and published many such calls for violence on his social media accounts, including by urging others to "[k]ill everyone who supports America and

Israel" and directing that "every individual or group capable of killing an American or Zionist target, whether civilian or military, in any country in the world, should begin by targeting them."

9. MOHAMMED BAQER SAAD DAWOOD AL-SAADI, the defendant, has also sought to exact revenge for the killing of Soleimani and al-Muhandis by targeting and promoting the targeting of former and current U.S. officials. For example, in or about 2023, AL-SAADI posted an image of the President of the United States with the shadow of a B-2 bomber hovering overhead, with the text of the post reading, "retribution must be exacted from the instigators and killers of Martyr Soleimani." The following year, in or about February 2024, AL-SAADI was pictured in front of an array of machineguns in a conference room located in a building that AL-SAADI identified was used for "military intelligence" for "the resistance" during an interview with U.S. law enforcement officials after he was arrested on or about May 1, 2026. The room had a map of the United States on the wall next to a list of "legitimate targets" (redacted here) identifying former and current U.S. officials.



AL-SAADI, MOHAJERI, and AL-HASSANI
Facilitated the European Terrorist Attacks

10. In or about March and April 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, also directed and promoted the European Terrorist Attacks. Those included, among others, attacks against the Bank of New York Mellon building in Amsterdam; the Bank of America building in Paris; and synagogues, ambulances, a Jewish charity organization, the Israeli Embassy, and two Jewish men in London, including a dual U.S.-U.K. citizen.

11. Among the individuals with whom MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, worked to facilitate and carry out the European Terrorist Attacks were MOHSEN MOHAJERI and MOHAMMED ALI AL-HASSANI, the defendants. MOHAJERI is an Iranian national and operative of the IRGC who coordinated with AL-SAADI and AL-HASSANI to carry out those terrorist attacks with the IRGC's support. AL-HASSANI, who is originally from Iraq but previously lived in the United Kingdom, used his contacts and criminal associates to carry out terrorist attacks in the United Kingdom.

12. In early March 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI and MOHSEN MOHAJERI, the defendants, began plotting to carry out terrorist attacks in Europe. To do so, AL-SAADI and MOHAJERI, who was officially a member of the IRGC from at least in or about 2004, discussed procuring drones and missiles from MOHAJERI's IRGC contacts and broader network in Iran.[1] AL-SAADI also asked MOHAJERI whether MOHAJERI and his IRGC network would work with Kata'ib Hizballah to carry out attacks. For example, on or about March 2, 2026, AL-SAADI wrote to MOHAJERI, "Due to the size and abundance of targets, is it permissible for me to coordinate with our brothers in Kata'ib Hizballah and have joint work and a

[1] All electronic communications between AL-SAADI, MOHAJERI, and AL-HASSANI referenced within this Superseding Indictment are in Arabic. Draft translations from Arabic to English are included herein.

combined attack of drones and missiles? I await your news . . . Speak to Al-Husseini, office management of Abu Hussein, so that the attack is very violent." MOHAJERI responded, "There is no problem, but managing work must be in your hands, not with the battalions . . . and make sure to photograph a video and pictures." AL-SAADI also implored MOHAJERI to come to Iraq "to take revenge" for the death of a particular Iranian leader and posted a call to action online titled "Shadow soldiers," giving AL-SAADI's "permission" to "all silent cells" across the world to begin engaging in "work," *i.e.*, terrorist attacks against civilians and U.S. and Israeli targets.

13. In the days that followed, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI and MOHSEN MOHAJERI, the defendants, continued their conversations about coordinating efforts to carry out attacks. Those discussions concerned, among other things, how to finance their attacks; MOHAJERI joining AL-SAADI in Iraq to facilitate the attacks; and the identification of certain targets in Europe for their attacks. For example:

a. On or about March 7, 2026, MOHAJERI wrote to AL-SAADI, "I can come and work with you as a soldier for you . . . Should I come to you and become a martyr? . . . How can I help you? Should I come to your place and fight with you? . . . I want to come to you and fight." Later in the conversation, MOHAJERI provided an Iranian bank account number to AL-SAADI, which MOHAJERI described as an account to buy "equipment for jihad." AL-SAADI then requested a credit card number to use to transfer money. In response, MOHAJERI sent AL-SAADI a picture of an Iranian credit card, which was in the name of "Daniel Mohajeri," who MOHAJERI identified as "my son."

b. Later the same day, on or about March 7, 2026, AL-SAADI wrote to MOHAJERI, "Any target I can bomb through my brothers in the Iraqi resistance. I have given them a quarter of the targets," to which MOHAJERI responded, "I will go there and work with

you. I will be a soldier under your command." AL-SAADI stated, "The important thing is that every goal you have in Europe and anything against the enemy must be targeted," to which MOHAJERI responded, "I will come and we will do them together and execute the attacks . . . I will not return to Iran until we take revenge."

c. On or about March 8, 2026, MOHAJERI told AL-SAADI that he had previously worked with the head of IRGC's special operations division. MOHAJERI then expressed that he would come to Iraq from Iran to work with AL-SAADI. The next day, MOHAJERI traveled to Iraq to join AL-SAADI.

14. Around this same time, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, also began coordinating potential attacks with MOHAMMED ALI AL-HASSANI, the defendant. For example, on or about March 9, 2026, AL-SAADI sent AL-HASSANI the image below with the HAYI logo (circled in red) and a call to engage in "jihad," or violent holy war, and also posted to one of his social media accounts a message with HAYI's logo, calling on "warriors of Islam" to engage in jihad. That same day, the first of the European Terrorist Attacks was carried out on behalf of and in coordination with Kata'ib Hizballah, the IRGC, and other FTOs.



15. Thereafter, and up until on or about April 29, 2026, HAYI claimed responsibility for the European Terrorist Attacks—approximately 18 attacks and attempted attacks across Europe against U.S. and Jewish targets. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI and

MOHSEN MOHAJERI, the defendants, helped create and publish online propaganda videos of these attacks for which HAYI claimed responsibility. Those videos were intended, in part, to sow fear among civilians as part of the defendants' efforts to engage in "psychological warfare" against civilians.

16. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, were personally involved in planning many of the European Terrorist Attacks. For example:

a. On or about April 6, 2026, MOHAJERI and AL-HASSANI planned attacks while together in a room in Iraq with a map of London displayed on a computer screen. In the video, MOHAJERI told AL-HASSANI, "we need to get focused on London." An image of the video is below, with MOHAJERI on the right and AL-HASSANI on the left. HAYI then claimed responsibility for six terrorist attacks that occurred in and around London starting approximately one week later.

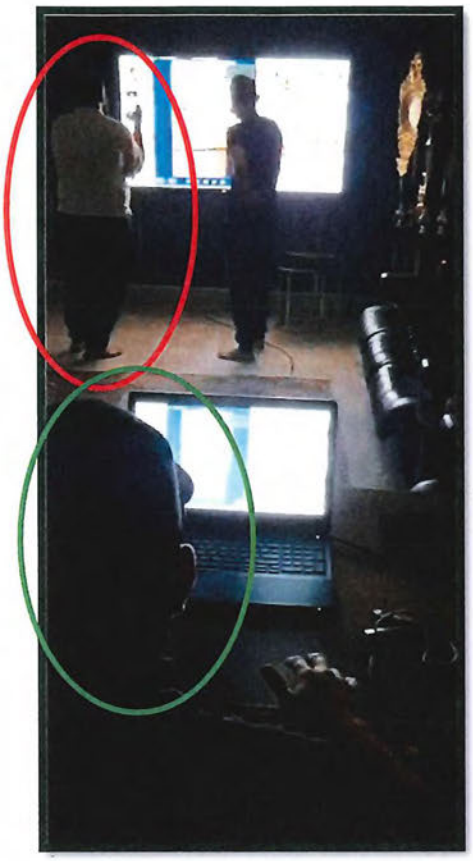


b. On or about April 15, 2026, AL-HASSANI participated in a video call with an individual committing an arson attack on a media organization that took place in London the same day, with the HAYI logo projected on AL-HASSANI's computer screen. On the video call, AL-HASSANI directed the individual to "Go as close as you can to the gate and dash it and show me on the camera I'm recording." An image from the video is below.



c. On or about April 17, 2026, AL-SAADI, AL-HASSANI, and MOHAJERI directed an individual to carry out one of the European Terrorist Attacks—an arson attack on a Jewish charity organization in London—in real time. Specifically, AL-SAADI, AL-HASSANI, and MOHAJERI, along with others, were in a room watching a FaceTime video with the individual who was carrying out the attack, which was projected onto a large screen against the background of the HAYI logo. AL-HASSANI directed the perpetrators' actions, including by instructing the individual on the other end of the call to execute the attack and directing that individual to take a lighter and "light one in your hand," "light it," and "throw the fourth one." AL-SAADI recorded the attack, while MOHAJERI recorded AL-HASSANI and AL-SAADI in the room as they directed the attack. A still image from MOHAJERI'S recording, showing AL-

SAADI (circled in red) and AL-HASSANI (circled in green), as they directed and filmed the attack, is below.



d. The next day, on or about April 18, 2026, AL-HASSANI participated in another video call with an individual carrying out an attack on a synagogue in London, with the HAYI logo projected on AL-HASSANI's screen. During the video call, AL-HASSANI directed the individual to "light it up like a Christmas tree." The person then lit an improvised explosive device and threw it at a building. An image from the video is shown below.



17. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, also used an encrypted application to discuss, among other topics, the European Terrorist Attacks and additional attacks that they were trying to plan. For example:

a. On or about April 23, 2026, MOHAJERI sent AL-SAADI a document referencing the arson attack at a synagogue in northwest London that occurred on or about April 18, 2026, and for which HAYI claimed responsibility.

b. On or about April 24, 2026, MOHAJERI sent AL-SAADI an attachment titled "New Goals," which was a plan for future terrorist attacks that included images of synagogues and Jewish-owned businesses in and around London, as well as maps identifying those exact locations, and stated, "5 New Goals, send to Ali." AL-SAADI then sent the "New Goals"

guide to AL-HASSANI. Within the same minute, AL-SAADI responded and confirmed with MOHAJERI that he had sent it to AL-HASSANI.

c. On or about April 29, 2026, AL-SAADI and MOHAJERI communicated about a stabbing attack in London that had occurred earlier that day, for which HAYI claimed responsibility. That same day, AL-SAADI instructed another individual with whom AL-SAADI had been in contact about the European Terrorist Attacks to post video footage of the attack and a HAYI propaganda video about the attack "in the news," telling the individual that, "[i]f God grants us success tonight, there will be a shooting at a restaurant."

The Attempted Terrorist Attacks in the United States

18. In or about March and April 2026—while MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, were co-located in Iraq planning the European Terrorist Attacks—AL-SAADI also attempted to coordinate terrorist attacks in the United States, including by targeting a synagogue in Manhattan.

19. For example, on or about April 30, 2026—the day after communicating with MOHAJERI about the stabbing attack in London—AL-SAADI exchanged messages with a U.S.-based individual ("SOI-1") about using another individual, who unbeknownst to AL-SAADI was an undercover law enforcement officer ("UC-1"), to commit a U.S.-based attack, including by having UC-1 carry out a "burning" and commit the "killing" of civilians. AL-SAADI had previously sent UC-1 targeting packages identifying three prominent Jewish institutions in the United States, including a synagogue in Manhattan. AL-SAADI directed UC-1 to attack those locations, either by arson or through the use of explosives, and paid UC-1 an initial installment of

approximately $3,000 in U.S. currency in anticipation of UC-1 conducting the attack on the Manhattan synagogue.

20. In numerous recorded communications in or about March and April 2026 with SOI-1, AL-SAADI made clear that he was planning the U.S.-based attacks in conjunction with his HAYI co-conspirators, and that the same members of that terrorist network wanted to strike civilian targets in the United States.

The RAF Fairford Terrorist Plot

21. On or about May 1, 2026, following the European Terrorist Attacks, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, was arrested abroad, and subsequently transferred to the custody of the United States to face prosecution. AL-SAADI has been in federal custody since his arrival in the United States. For approximately four months following AL-SAADI's arrest, there were no additional attacks or plots attributable to AL-SAADI, MOHSEN MOHAJERI, or MOHAMMED ALI AL-HASSANI, the defendants.

22. By at least in or about August 2026, however, MOHAMMED ALI AL-HASSANI, the defendant, directed and paid associates in the United Kingdom to conduct preparatory steps and arrange logistics for the RAF Fairford Terrorist Plot. For example, on or about August 22, 2026, Al-HASSANI paid one individual ("Individual-1") to perform pre-operational surveillance of RAF Fairford's perimeter and subsequently received videos of the area surrounding the base. In later communications with AL-HASSANI, Individual-1 referred to him as "Ali." In or about September 2026, AL-HASSANI also tasked and paid several individuals to help him prepare for the plot, and those individuals conducted preparations for the plot by procuring vans and barrels of fuel, researching the purchase of chemical accelerants, including large quantities of potassium chloride, and buying metallic objects that could be used as explosive shrapnel. At AL-HASSANI's

urging, those individuals commissioned custom decals that they affixed to the vans to create the appearance that they were used by a fuel delivery business and a swimming pool supply business.

23. On or about September 26, 2026, MOHAMMED ALI AL-HASSANI, the defendant, tasked individuals to drive three vans, some of which were later determined to contain barrels of fuel, to the RAF Fairford base. That day, AL-HASSANI was in frequent communication with the van drivers, helping to coordinate their movements and directing them where to drive. At least two of the three vans, while en-route to the perimeter of RAF Fairford, encountered a security roadblock and were not permitted to proceed on their intended route. AL-HASSANI communicated with the drivers and occupants of the vans both before and after encountering the security checkpoint. In the early morning hours on or about September 27, 2026, law enforcement authorities in the United Kingdom recovered three white vans to which the fuel delivery business logos were affixed and arrested the occupants.

AL-SAADI Passed Information and Directives to MOHAJERI and AL-HASSANI in Advance of the RAF Fairford Terrorist Plot

24. While in prison in New York awaiting trial on the charges in the Indictment described above, *see supra* para. 2, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, has had phone and video calls with his immediate family members located in Iraq. AL-SAADI used certain of those calls to pass coded messages to MOHSEN MOHAJERI and MOHAMMED ALI AL-HASSANI, the defendants, in the days leading up to the RAF Fairford Terrorist Plot.

25. For example, between in or about June and July 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, spoke with his mother and sister about MOHSEN MOHAJERI, the defendant. During those calls, they referred to MOHAJERI by various aliases, including "Abbas, Abu Daniel" and "Sayyid Abbas." As described above, MOHAJERI previously

told AL-SAADI that he had a son named "Daniel" and that AL-SAADI could transfer money to an account in MOHAERJI's son's name in furtherance of their terrorist activity. During AL-SAADI's calls while in prison, AL-SAADI also told his family members that he owed money to MOHAJERI and directed them to pass along messages to MOHAJERI about "work," a term AL-SAADI regularly used to describe terrorist activity, including in social media posts and in previous discussions with MOHAJERI about partnering to conduct terrorist attacks. On one of those calls, on or about July 30, 2026, AL-SAADI also asked his sister, "What are they doing about all our old work?" and asked her whether it had been cancelled or just put on pause. AL-SAADI's sister responded that "it isn't cancelled."

26. On or about September 24, 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, once again spoke with his immediate family by phone. On the call, AL-SAADI inquired about how MOHAMMED ALI AL-HASSANI, the defendant, whom AL-SAADI referred to as "Ali," was doing. AL-SAADI's family informed AL-SAADI that "Ali" had been transferred to the "International Section." AL-SAADI then instructed his family to "give him [*i.e.*, AL-HASSANI] money so we can do it." As described above, three days later, AL-HASSANI orchestrated the RAF Fairford Terrorist Plot.

STATUTORY ALLEGATIONS

27. From at least in or about 2017, up to and including in or about the date of the filing of this Superseding Indictment, 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, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, 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 Superseding Indictment.

28. It was a part and an object of the conspiracy that MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, 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:

29. The allegations contained in paragraphs 1 through 26 of this Superseding Indictment are incorporated as though fully set forth herein.

30. From at least in or about 2019, up to and including in or about the date of the filing of this Superseding Indictment, 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, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, 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 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 Superseding Indictment.

31. It was a part and an object of the conspiracy that MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, 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:

32. The allegations contained in paragraphs 1 through 26 of this Superseding Indictment are incorporated as though fully set forth herein.

33. From at least in or about February 2026, up to and including in or about the date of the filing of this Superseding Indictment, 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, MOHSEN MOHAJERI and MOHAMMED ALI AL-HASSANI, the defendants, 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:

34. The allegations contained in paragraphs 1 through 26 of this Superseding Indictment are incorporated as though fully set forth herein.

35. From at least in or about February 2026, up to and including in or about the date of the filing of this Superseding Indictment, 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, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, at least one of whom 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:

36. The allegations contained in paragraphs 1 through 26 of this Superseding Indictment are incorporated as though fully set forth herein.

37. 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:

38. The allegations contained in paragraphs 1 through 26 of this Superseding Indictment are incorporated as though fully set forth herein.

39. From at least in or about February 2026, up to and including in or about the date of the filing of this Superseding Indictment, in the Southern District of New York and elsewhere, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, 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

40. In furtherance of the conspiracy and to effect the illegal object thereof, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, and their 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, MOHAJERI, AL-HASSANI, 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, MOHAJERI, AL-HASSANI, 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, MOHAJERI, AL-HASSANI, 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:

41. The allegations contained in paragraphs 1 through 26 of this Superseding Indictment are incorporated as though fully set forth herein.

42. 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:

43. The allegations contained in paragraphs 1 through 26 of this Superseding Indictment are incorporated as though fully set forth herein.

44. From at least on or about February 2026, up to and including in or about the date of the filing of this Superseding Indictment, 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, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants, at least one of whom 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

45. As a result of committing the terrorism offenses charged in Counts One, Two, Three, Four, Six, and Eight of this Superseding Indictment, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the

defendants, 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 defendants; any and all assets, foreign and domestic, affording the defendants 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 defendants' assets.

46. As a result of committing the offenses alleged in Counts Five and Seven of this Superseding 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

47. If any of the above-described forfeitable property, as a result of any act or omission of MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, MOHSEN MOHAJERI, and MOHAMMED ALI AL-HASSANI, the defendants:

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 defendants 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]

FOREPERSON 11-10-26

JAMES M. MCDONALD
United States Attorney