

DMP/ICR/NG
F. #2020R00785

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

MOHAMMAD DAVID HASHIMI,
ABDULLAH AT TAQI,
KHALILULLAH YOUSUF, and
SEEMA RAHMAN,

Defendants.

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TO BE FILED UNDER SEAL

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF APPLICATION FOR
ARREST WARRANTS

(18 U.S.C. §§ 2339B(a)(1) and 3551 et
seq.)

Docket No. 22-MJ-1323

EASTERN DISTRICT OF NEW YORK, SS:

MELISSA A. GALICIA, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

CONSPIRACY TO PROVIDE MATERIAL SUPPORT
TO THE ISLAMIC STATE OF IRAQ AND AL-SHAM (“ISIS”)

In or about and between July 2020 and the present, both dates being approximate and inclusive, within the Eastern District of New York, the extraterritorial jurisdiction of the United States, and elsewhere, the defendants MOHAMMAD DAVID HASHIMI, ABDULLAH AT TAQI, KHALILULLAH YOUSUF, and SEEMA RAHMAN, together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including property and services, including currency and monetary instruments, to a foreign terrorist organization, to wit: the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act,

knowing that ISIS was a designated foreign terrorist organization and that ISIS had engaged in and was engaging in terrorist activity and terrorism, the offense occurred in part within the United States, the offense occurred in and affected interstate and foreign commerce, and the defendants were or conspired with a national of the United States (as defined in section 101(a)(22) of the Immigration and Nationality Act).

(Title 18, United States Code, Sections 2339B(a)(1) and 3551 et seq.)

The source of your deponent's information and the grounds for her belief are as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2015. I am currently assigned to the FBI's New York Joint Terrorism Task Force. As a Special Agent, I have conducted numerous investigations of foreign terrorist organizations and their supporters, during the course of which I have conducted physical surveillance, interviewed witnesses, debriefed confidential human sources, executed court-authorized search warrants and used other investigative techniques to secure relevant information. Through my training and experience, I have become knowledgeable in some of the tactics, techniques, and procedures used by foreign terrorist organizations, including the means by which such organizations communicate, plan and execute operations, and secure funds to finance their operations. I am familiar with the facts and circumstances set forth below from my participation in the investigation and from reports of other law enforcement officers involved in the investigation.

I. The Defendants

2. MOHAMMAD DAVID HASHIMI ("HASHIMI") is a 35-year-old male who resided in Staten Island, New York from approximately July 2020 to the summer of 2021. Postal records reflect that, on or about August 22, 2021, HASHIMI submitted a change of address

notification requesting that his mail be forwarded to an address in Sterling, Virginia. HASHIMI currently resides in Potomac Falls, Virginia. HASHIMI is a citizen of the United States.

3. ABDULLAH AT TAQI (“TAQI”) is a 23-year-old male residing in East Elmhurst, Queens, New York. TAQI is a citizen of the United States.

4. KHALILULLAH YOUSUF (“YOUSUF”) is a 34-year-old male who resides in North York, Ontario, Canada. YOUSUF is a citizen of Canada.

5. SEEMA RAHMAN (“RAHMAN”) is a 25-year-old female residing in Edison, New Jersey. RAHMAN is a citizen of the United States.

II. Foreign Terrorist Organizations

6. On or about October 15, 2004, the United States Secretary of State designated al-Qa’ida in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a FTO under Section 219 of the Immigration and Nationality Act and as an SDGT under section 1(b) of Executive Order 13224.

7. On or about May 15, 2014, the Secretary of State amended the designation of AQI as a FTO under Section 219 of the Immigration and Nationality Act and as a SDGT under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (“ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-’Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO and SDGT.

8. ISIS Wilayat Khorasan (in English, ISIS Province Khorasan), announced its formation in or about January 2015. The group is based in the Afghanistan/Pakistan region and

is composed primarily of former members of Tehrik-e Taliban Pakistan and the Afghan Taliban. The senior leadership of ISIS Wilayat Khorasan pledged allegiance to former ISIS leader Abu Bakr al-Baghdadi, who accepted their pledge in late January 2015. Since then, ISIS Wilayat Khorasan has carried out suicide bombings, small arms attacks and kidnappings in eastern Afghanistan against civilians and Afghan National Security and Defense Forces, and it claimed responsibility for May 2015 attacks on civilians in Karachi, Pakistan.

9. The United States Secretary of State designated ISIL Khorasan as a FTO under Section 219 of the Immigration and Nationality Act on or about January 14, 2016, and as a SDGT under section 1(b) of Executive Order 13224 on or about September 29, 2015. The Secretary of State also listed the following aliases for ISIL Khorasan: Islamic State's Khorasan Province, ISIS Wilayat Khorasan, ISIL's South Asian Branch, and South Asian Chapter of ISIL (hereinafter referred to as "ISIS Khorasan" or "ISIS-K"). To date, ISIS-K remains a designated FTO and SDGT.

10. Since its designation as an FTO and SDGT, ISIS-K has continued to carry out terrorist attacks against civilians and government buildings and personnel. Significantly, ISIS-K has claimed responsibility for a suicide bombing attack at Hamid Karzai International Airport in Kabul, Afghanistan on or about August 26, 2021, that killed over 170 people, including 13 members of the U.S. military who were at the airport to safeguard the evacuation of U.S. citizens and others from Afghanistan.

III. Probable Cause

11. The United States Attorney's Office for the Eastern District of New York and the FBI's Joint Terrorism Task Force are conducting a criminal investigation into a fundraising network using cryptocurrency exchanges and other financial transactions to launder

money and to use that money to support designated foreign terrorist organizations based in Syria, including ISIS.

12. As part of that investigation, the government has obtained financial and other records reflecting that HASHIMI, TAQI, YOUSUF, and RAHMAN, among others, have conspired to provide material support to ISIS by collecting and transferring funds, directly and indirectly, to individuals who represent themselves to be supporters of ISIS.

A. The Defendants Provide Virtual Currency Transfers to Support ISIS Fighters

13. As detailed below, the government's investigation has revealed evidence that HASHIMI and YOUSUF, among others, are members, or former members, of a group chat ("Group Chat-1") on an encrypted social media and mobile messaging electronic communication service (hereinafter the "ECS"), which facilitates communication between supporters of ISIS and other groups that adhere to similar violent jihadist ideologies.

14. In early April 2021, one member ("Member-1") of Group Chat-1 asked other members to:

post all serious donation links that helps our mujahideen, our brothers and sisters suffering, our brothers and sisters in need of food, water and even if its helping animals and environment that got devastated by the kuffar. Post them here or in secret chat. For safety reason, post just the links without telling for what the money is being used.

Based on the context of the message, I believe that Member-1's reference to "serious donation links" for "mujahideen" refers to fighters fighting for foreign terrorist organizations. Moreover, I believe that Member-1 requested that other members not disclose the purpose for which the money would be used to make it more difficult to prove that any individual member had knowingly provided money to support terrorism or a terrorist organization in the event that law enforcement was monitoring the communications in Group Chat-1.

15. In response to this message, another member of Group Chat-1 (“Member-2”) posted a message asking users to “not forget the sister from the camp.” Member-2 then posted a link to a PayPal.Me profile with the heading “Pay [Facilitator-1] using PayPal.Me” and wrote “This account is special in my family may God bless you and may God forgive you.” Notably, the link indicated a connection (discussed further below) between “Umm Mohammad” and an identified person located in Gaza, Palestine, who, as described herein, has claimed to launder monetary contributions by others to ISIS through both virtual currency and traditional fiat currency transactions (“Facilitator-1”).

16. Also in response to Member-1’s request for donation links, YOUSUF (using an account with the display name “Khorasan E”) posted a message to the chat with a specific BTC address that, as detailed below, is controlled by Facilitator-1 (the “Facilitator-1 BTC Address”), writing “If anyone wants to donate to actual mujahideen in the battlefield” “This brother is legit^^^.” YOUSUF then deleted the image containing the Facilitator-1 BTC Address within approximately 10 minutes of posting it. Records of the cryptocurrency exchange hosting the Facilitator-1 BTC Address (“Exchange-1”) reflect that it is controlled through an account owned by Facilitator-1, the same individual who was referenced in the PayPal link posted by Member-2 just prior to YOUSUF’s posting the Facilitator-1 BTC Address to the members of Group Chat-1.

17. HASHIMI (using the handle @saltedhash99 and the display name “G Hash”) responded in Group Chat-1 to YOUSUF posting the Facilitator-1 BTC Address, writing “Just be careful” and “Abu Hamza thought he was speaking to someone who was legit.” I understand HASHIMI’s reference to “Abu Hamza” to refer to a defendant in another district whom the FBI arrested on or about March 24, 2021, on an arrest warrant issued on probable cause to believe that defendant had attempted to provide material support to a designated foreign

terrorist organization, specifically ISIS, in violation of 18 U.S.C. § 2339B. The government's investigation revealed that defendant was known to the members of Group Chat-1 by the alias "Abu Hamza al Rumi." Following Abu Hamza's arrest, the FBI executed a court-authorized search of Abu Hamza's accounts on the ECS. Among other things, and as relevant here, the FBI obtained over 1,700 communications between Abu Hamza and YOUSUF through the ECS between approximately November 2020 and Abu Hamza's arrest in March 2021. Among other things, YOUSUF and Abu Hamza discussed archiving, creating and translating ISIS and other jihadist propaganda; including at one point using Bitcoin to donate money to persons located in Iraq and Syria; and their awareness of the laws prohibiting the provision of support to foreign terrorist organizations in different countries.

18. In response to HASHIMI's message to be "careful," YOUSUF responded that "I think the fed messaged Abu Hamza in an entrapment sting." To which HASHIMI replied, "Yeah but it was over time" "Maybe even over a year to win his trust." YOUSUF replied, "Where as the brother I know was referred to me by a legit sister." Thus, in context, I believe that HASHIMI's admonitions to the members of Group Chat-1 to be careful in sending money to support fighters of foreign terrorist organizations through the links disseminated in Group Chat-1 reflect his awareness that sending money for that purpose is unlawful, and that U.S. law enforcement agencies are actively investigating and seeking to apprehend individuals who do so.

19. Between February 15, 2021 and July 18, 2022, the Facilitator-1 BTC Address received 55 Bitcoin transfers totaling .68337857 BTC (\$25,358).¹ Of that amount,

¹ The U.S. dollar equivalent values reflected in this Complaint are based on information provided by Exchange-1.

.64207105 BTC (\$24,044)—nearly all of that money—came from YOUSUF, TAQI, and RAHMAN. Specifically, the following chart reflects the cumulative donations from each of YOUSUF, TAQI, and RAHMAN during that time frame:

BTC Transfers to the Facilitator-1 BTC Address		
Sender	BTC Amount	USD Equivalent
YOUSUF	0.55735546	\$20,347.89
TAQI	0.06177639	\$2,769.35
RAHMAN	0.02293920	\$927.51
Total	0.64207105	\$24,044.76

20. YOUSUF’s donations of \$20,347.89 took place in 26 transactions through his account at a different cryptocurrency exchange (“Exchange-2”) between February 15, 2021 and July 18, 2022. TAQI’s donations of \$2,769.35 took place in 15 transactions from his account at a separate cryptocurrency exchange (“Exchange-3”) between May 4, 2021 and March 21, 2022. RAHMAN’s donations of \$927.51 took place in nine transactions from her Exchange-3 account between June 11, 2021 and February 18, 2022.

21. As set forth below, the Facilitator-1 BTC Address to which these donations were made was collecting and distributing money for fighters fighting on behalf of ISIS.

B. TAQI and Facilitator-1 Explain the ISIS-Support Conspiracy to CHS-1 and Facilitator-1 Identifies HASHIMI and YOUSUF as Members

22. On or about October 17, 2021, a confidential human source, whose information has proven reliable and is corroborated by other evidence (“CHS-1”) began messaging TAQI on an encrypted messaging electronic communication service. Over time, TAQI and CHS-1 began discussing using cryptocurrency. On or about January 17, 2022, TAQI stated to CHS-1 that he used cryptocurrency “to send sadaqah” and that cryptocurrency was

“good to send money unnoticed.” Based on my training and experience, I am aware that the Arabic term “Sadaqah” is typically used to refer to charitable giving. TAQI stated, “I just know the ikhwan use it for sadqah and giving money fisabilillah.” Based on my training and experience, I understand “Ikhwan” to be an Arabic term for “the brothers” or “brotherhood” and that “fisabilillah” translates to “for the sake of Allah.”

23. During continued conversations in January 2022, TAQI explained that he had originally contributed through an individual who had been “killed around the time of the last Eid” and that TAQI was now contributing through a different “brother.” CHS-1 asked whether the brother “is he in touch with other mujahideen on the fronts?” TAQI responded, “Yea, but I dont ask him too much about what going on.”

24. Also in January 2022, CHS-1 and TAQI discussed via the encrypted communications platform U.S. troops’ involvement in retaking a prison that ISIS had taken control of in northeastern Syria. TAQI stated, “All we really need is maybe like 100,000 fighters and biidhnillah the Muslims could conquer the world cause most of our enemies are cowards,” and “If dawlah can get a strong hold in the Middle East fully secure the puppet states ruling of the Muslims would fall like dominoes.” Based on my training and experience, I am aware that the term “dawlah” translates from Arabic to “State” in English, and is used by ISIS supporters to refer to ISIS.

25. On or about February 3, 2022, ISIS’s leader, Abu Ibrahim al Hashimi al Quarayshi, was killed in Syria when he detonated an explosive device during a U.S. special operations raid to kill or capture him. When CHS-1 and TAQI discussed the reporting of al Quarayshi’s death, TAQI stated, “If its true, may Allah grant him thr highest rank in Jannah.” TAQI added, “The kffr still dont realize killing leaders wont achieve anything, as long as Islam is

in our hearts and we dont give up” and “it shouldn’t deter us. This deen will be victorious, Allah will make the way.”

26. Also on or about February 3, 2022, CHS-1 told TAQI that through their conversations TAQI had inspired CHS-1 to start deducting his salary to help the brothers. TAQI said he would tell the “brother” about CHS-1 and confirmed that the brother was “from Dawlah,” which I assess to mean ISIS.

27. In or about May 2022, TAQI and CHS-1 again discussed TAQI putting CHS-1 in touch with the “brother.” TAQI stated that he had not been able to send “sadaqah.” When CHS-1 asked if there was anything CHS-1 could do to help, TAQI stated “No akhi [my brother] its just for my safety because sending money is risky.”

28. On or about May 17, 2022, TAQI told CHS-1 that TAQI had discussed CHS-1 with the brother, who was Facilitator-1, and that Facilitator-1 had said that CHS-1 could contact Facilitator-1 through the ECS. TAQI provided CHS-1 with Facilitator-1’s ECS account. TAQI stated to CHS-1 that Facilitator-1 “mainly speaks in Arabic but he knows some English because an American brother taught him some.”

29. CHS-1 then asked TAQI, “Before I message him, you can make tazkiyah for him? you totally know he’s a brother with Dawlah? Because I know its been a while and then kuffar deleted your [ECS account], just making sure its the same brother you sent money to and he’s Dawlah 100%. Im asking because I trust you 100%.” TAQI responded, “Yes akhi he also asked me about your trustworthiness and I said that you are akhi. He asked me why you want to contact him and I told him that I think you want to send sadaqah. He then told me he prefers you to contact him on [the ECS].” I assess that TAQI vouched to Facilitator-1 for CHS-1’s bona fides as an ISIS supporter, and well as vouching for Facilitator-1’s support for ISIS to CHS-1.

30. On or about May 18, 2022, CHS-1 messaged Facilitator-1 on the ECS. Facilitator-1 asked CHS-1, “Do you want to send alms to us? How much will you send to us brother? How much.” Facilitator-1 stated that “Bitcoin is the safest way” to send money, and provided CHS-1 with the Facilitator-1 BTC Address as a means to send money. As noted above, the Facilitator-1 BTC Address is owned and operated by Facilitator-1.

31. Facilitator-1 also instructed CHS-1 in operational security, advising CHS-1 to “use your fake name on social media,” “don’t trust anyone,” “use another phone” to connect “Only with us,” and “do not put a SIM card in it.” These tips, Facilitator-1 stated, were “So that it is difficult for the infidels to discover you.”

32. After CHS-1 sent approximately \$150 worth of Bitcoin to the Facilitator-1 BTC Address on May 19, 2022, Facilitator-1 confirmed receipt of the Bitcoin. Facilitator-1 also asked CHS-1 to collect money from others that CHS-1 trusted and send it to Facilitator-1 as well.

33. On or about May 23, 2022, Facilitator-1 sent CHS-1 a link to an Internet-based fundraising campaign on the website GoFundMe titled “Help Umm Abdullah, organized by Mohammad Hassan.” As described below, this was a GoFundMe campaign created by YOUSUF. Facilitator-1 asked CHS-1 to “share the donation link to your friends and post it on Twitter.”

34. On or about June 8, 2022, CHS-1 told Facilitator-1 that CHS-1 found two brothers who wanted to donate but that CHS-1 needed “to prove to them that the money is going to the ikhwan for dawlah.” Facilitator-1 asked CHS-1, “What evidence do they want.” CHS-1 replied, “Maybe a picture of the weapons.” Facilitator-1 then sent CHS-1 multiple photographs and a video. One of the photographs is depicted below:



35. The photographs and video that Facilitator-1 sent depict tactical gear, ammunition, and grenades on top of an ISIS flag. The photographs and video also contained a

handwritten note reading, “[CHS-1 name] 6-8.”² The writing “6-8” corresponds to the date of the communications between CHS-1 and Facilitator-1.

36. Facilitator-1 stated to CHS-1 that he is in ISIS’s central media organization and that he “know[s] everything.” Facilitator-1 asked CHS-1 about CHS-1’s job, if CHS-1 lived in America, and if CHS-1 would be joining them. CHS-1 responded, “The kuffar here closed the doors a long time ago for Hijrah,” meaning that he could not travel to join ISIS fighters. In response, Facilitator-1 asked CHS-1, “Brother, are you ready to be a lone wolf?” Facilitator-1 also asked CHS-1 to send a pledge of allegiance, also known as a bay’ah, to the Caliph. Based on my training and experience, I know that “Caliph” is a term that ISIS supporters use to refer to the leader of ISIS’s self-declared caliphate.

37. On or about June 10, 2022, Facilitator-1 and CHS-1 continued their conversation about CHS-1 collecting money from other brothers to send to Facilitator-1. Facilitator-1 then sent an additional photo depicting ammunition and grenades on top of an ISIS flag, to indicate that the funds he was collecting were to supply weapons to ISIS. The photo sent by Facilitator-1 is shown below:

² The photographs and screenshots depicted in this affidavit have been redacted to conceal the handwritten note containing the name by which Facilitator-1 knew CHS-1.



38. Facilitator-1 stated to CHS-1, “I am responsible for the donations that come to a country and I transfer them to the Mujahideen in all the states.” CHS-1 asked Facilitator-1 how Facilitator-1 sends money, whether through Bitcoin or other means. Facilitator-1 stated that he sends money only through Bitcoin, but that in the “state of Khorasan and in some states,” money is delivered by hand. Based on my training and experience, I assess the reference to “Khorasan” to mean Afghanistan and the money sent to Khorasan to be for ISIS-K.

39. Facilitator-1 continued to press CHS-1 for additional money from CHS-1’s friends. Facilitator-1 advised CHS-1 that when CHS-1 gathers from “unreliable friends,” CHS-1 should tell them that you are “collecting money . . . for the family. Poor . . . there’s no amount to small and no deed to small.” Facilitator-1 then provided a link to a GoFundMe campaign titled “Help raise funds for some needy families for Eid”. As described below, this GoFundMe campaign was also created by YOUSUF. Facilitator-1 then stated, “We send it [the link] to the people, it is for poor families. But is for the Mujahideen. The families of Mujahideen.” CHS-

1 replied that the people CHS-1 collected money from wanted the money to go to jihad. Facilitator-1 responded, "As he wants, we will make his money go to the Mujahideen to buy ammunition." CHS-1 asked Facilitator-1 to confirm that money donated to the GoFundMe campaign is "for jihad." Facilitator-1 responded, "Yas . . . it is talk and words that are in the link are fake in order to deceive." I assess that Facilitator-1 is explaining that any references in the fundraising campaigns that the funds are for the "poor" is intended only to deceive law enforcement and that the funds are really going to the "mujahideen" an Arabic term that translates to "holy warriors" that is used by ISIS supporters to refer to ISIS fighters, and to "jihad," which means "holy war" but which is used by ISIS supporters to refer to violence against non-believers.

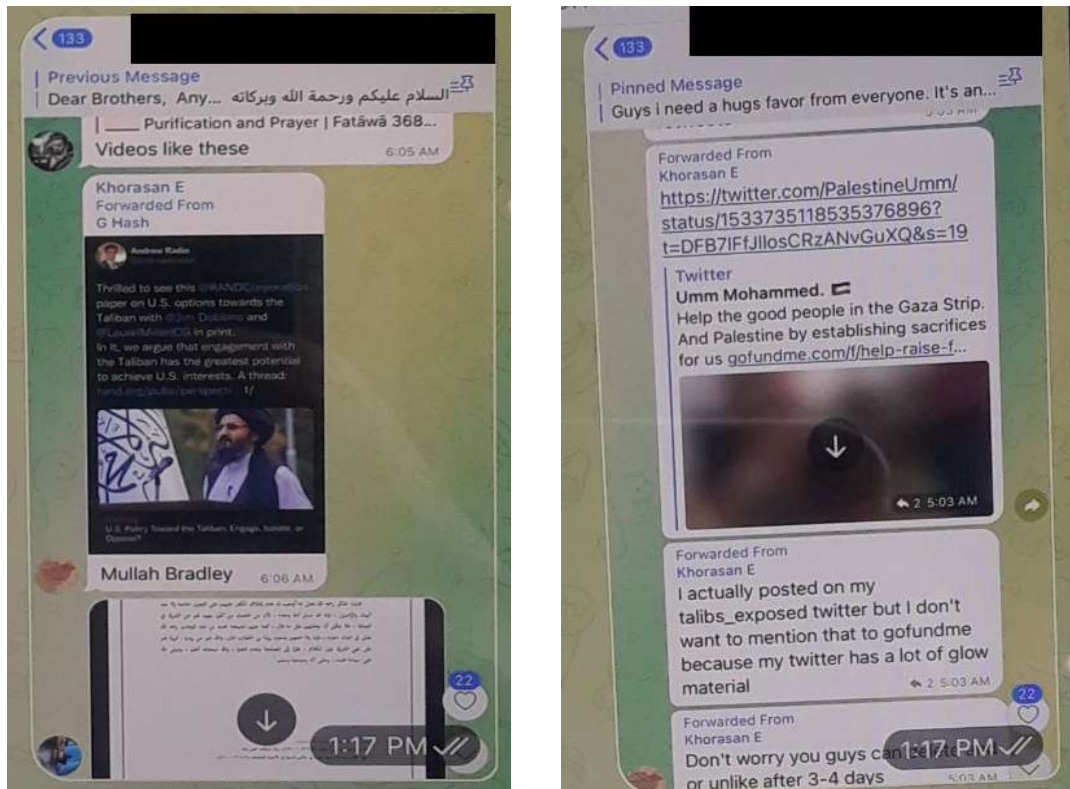
40. Facilitator-1 also confided to CHS-1 that he had known "Abu Ibrahim," meaning TAQI, for two years, and that TAQI regularly sent money to Facilitator-1.

41. On or about June 27, 2022, CHS-1 sent Facilitator-1 a photograph of a written pledge of allegiance from CHS-1 to ISIS's leader. In response, Facilitator-1 stated that he passed along the written pledge to the "Emir" and that CHS-1 could expect a personal response. Based on my training and experience, I am aware that ISIS organizes itself under leaders called "emirs" an Arabic term that translates in English to "prince." Facilitator-1 and CHS-1 continued to converse about sending money to Facilitator-1. Facilitator-1 again directed CHS-1 to donate funds to the Facilitator-1 BTC Address. As requested, CHS-1 sent \$350 worth of BTC to the Facilitator-1 BTC Address. Facilitator-1 confirmed receipt of the Bitcoin and stated, "By God's grace it reached 350\$."

42. Facilitator-1 and CHS-1 also discussed giving money via GoFundMe. CHS-1 asked Facilitator-1, "Is the gofundme safe?" Facilitator-1 responded, "Yes, brother, it is very safe . . . it is a deception for the infidels. It's for the poor." Based on my training and experience, I assess that Facilitator-1 was communicating that the description of the GoFundMe

campaign as raising money for the poor is a deception designed to conceal the true purpose for which the money was collected: to support ISIS fighters.

43. CHS-1 sent Facilitator-1 two screenshots of the GoFundMe campaign advertised on a separate group chat on the ECS. A copy of each screenshot is shown below:



44. These screenshots reference two other users: “Khorasan E,” an alias used by YOUSUF online, and “G Hash,” an alias used by HASHIMI online. CHS-1 asked Facilitator-1 whether “Khorasan E” and “G Hash” were brothers on “haqq.” Based on my training and experience, I know that “haqq” is the Arabic word for “truth,” but is colloquially used by ISIS supporters to refer to those who adhere to ISIS’s extremist ideology. Facilitator-1 confirmed he was in contact with each of them. Facilitator-1 stated that YOUSUF was “a very reliable brother.” CHS-1 stated that he wanted to reach out to YOUSUF and HASHIMI and ask them to donate to the mujahideen, but CHS-1 wanted to check first if they had already donated already.

Facilitator-1 replied, “Yes correct,” which I assess to mean that HASHIMI and YOUSUF had previously donated to Facilitator-1.

45. On or about June 30, 2022, Facilitator-1 sent CHS-1 an English translation of the message the “Emir” gave in response to CHS-1’s pledge of allegiance.

46. On or about July 17, 2022, CHS-1 told Facilitator-1 that CHS-1 had more money for Facilitator-1 and the mujahideen. Facilitator-1 again directed CHS-1 to send the money to the Facilitator-1 BTC Address. Facilitator-1 stated that his internet connection was weak because he was exposed to air shelling. CHS-1 then told Facilitator-1 that CHS-1 wanted to send the money not to the Facilitator-1 BTC Address, but to one of the GoFundMe campaigns that CHS-1 had seen advertised before. CHS-1 suggested reaching out to HASHIMI to arrange the payment. Facilitator-1 stated that HASHIMI was a trusted brother because “we know him through other brothers” but that Facilitator-1 did not want CHS-1 communicating with HASHIMI. Facilitator-1 then provided CHS-1 with a link to a Twitter account called talibs_exposed that shared a link to a GoFundMe campaign. The talibs_exposed Twitter account is used and controlled by YOUSUF. The GoFundMe campaign shared in this Twitter account is the “Help raise funds for some needy families for Eid” campaign created by YOUSUF. Facilitator-1 also provided CHS-1 with a direct link to the same GoFundMe campaign titled “Help raise funds for some needy families for Eid,” which was created by YOUSUF.

47. Additional evidence that Facilitator-1’s collection of money was for ISIS comes from subsequent conversations between CHS-1 and Facilitator-1. On or about November 7, 2022, CHS-1 contacted Facilitator-1 through the ECS and stated, “There is a brother I know and he wants to do an operation for dawlah.” CHS-1 stated that, “I know the brother and I trust him. And I want to send him [money emoji]. But I know the way I do with you and it’s safe. So Inshallah I want to send you all the money and you should send some to him.” CHS-1 sent

Facilitator-1 a link to a bitcoin wallet that was purportedly the wallet for the brother doing the operation. After Facilitator-1 asked “Who is this brother” and “where does he live?,” CHS-1 responded that the brother was “trusted” and Facilitator-1 shouldn’t ask questions. Facilitator-1 agreed and sent CHS-1 the Facilitator-1 BTC Address. CHS-1 then told Facilitator-1 that he would send \$100 for Facilitator-1 to send to the brother, and \$50 for Facilitator-1. Facilitator-1 stated that he understood: “Yes brother.” Facilitator-1 then added, “But my brother, I know that we are the ones who decide who goes to the operation, brother, we know everything.”

48. After CHS-1 sent \$150 to the Facilitator-1 BTC Address, Facilitator-1 responded, “Brother, we do not know anything. We must have details in order to spread the news.” I assess that Facilitator-1 was stating that ISIS needed to have details of the operation in order to later claim credit for it. Facilitator-1 stated that he was communicating with another brother who “is responsible for the security detachments and for individual bears in Europe and America.” I understand “bears” in this context to be a reference to ISIS operatives, and that Facilitator-1 was indicating that he was checking whether ISIS officials were aware of any such operation. Facilitator-1 stated that the operation that CHS-1 was describing “seems to be a scam.”

49. On or about November 15, 2022, Facilitator-1 told CHS-1 that Facilitator-1 would return the \$150 to CHS-1. Facilitator-1 stated that “the prince” stated that “there are no people working alone.” Facilitator-1 stated, “My brother, we have asked all states in all regions, and that there is no person, as you said, who wants to perform an operation.” Facilitator-1 told CHS-1 that the person CHS-1 was referring to was “fraudulent.” Facilitator-1 stated, “Brother, we keep your security and we fear for you. The person you are communication with may be fraudulent.” Facilitator-1 asked CHS-1 if CHS-1 could connect Facilitator-1 to the brother.

50. Later the same day, CHS-1 asked Facilitator-1 why Facilitator-1 had told the “prince” about the operation. Facilitator-1 responded, “There are many like him [referring to the brother asking to do the operation], and they deceive everything that is through us, and the spies must be checked, my brother.” Facilitator-1 also responded that “It is not permissible to hide anything from the prince” and that Facilitator-1 must hear and obey.

51. Facilitator-1 refused to send the money to the brother, and stated that he would return the \$150 only to CHS-1, stating: “Bro forgive us bro can you give us your information so we can send you money... We will send the money to your account not to the brother.” Facilitator-1 asked CHS-1 to provide a USDT account to return the money, which I assess to refer to a Tether account.

52. On or about November 18, 2022, Facilitator-1 sent the CHS a screenshot indicating that Facilitator-1 had sent CHS-1 approximately 100 USDT. Facilitator-1 then stated, “The brothers have sent, forgive us for the delay. The reason was that they used the money directly for the Mujahideen. And wait for the lakh to arrive another money to send it to you.” The wallet that CHS-1 provided to Facilitator-1 received approximately 100 USDT.

C. The Defendants Contribute Money to ISIS Through Other Means

53. In addition to cryptocurrency transactions, the members of the conspiracy have also collected money for and transferred money to Facilitator-1 through other means, including through GoFundMe fundraising campaigns, and PayPal and Western Union wire transfers that demonstrate a pattern of activity intended to conceal the true purpose and intended beneficiaries of the funds transfers. This coordinated activity provides further evidence that these other fundraising efforts were intended as contributions for fighters fighting on behalf of ISIS.

54. Before sending Bitcoin to the Facilitator-1 BTC Address, TAQI had previously contributed money to Facilitator-1 via PayPal in March and April 2021. On or about March 10, 2021, TAQI used a PayPal account that he registered to send approximately 1,000 Israeli New Shekels (at the time, valued at approximately \$300) to Facilitator-1. TAQI's PayPal transfer included a note written in Arabic, which is transliterated to Roman characters as "sadaqah," and as explained above translates in English to "charity." On or about April 10, 2021, TAQI used the same PayPal account to send approximately 600 Israeli New Shekels (at the time, valued at approximately \$182) to Facilitator-1's PayPal account. This PayPal transfer also included a note written in Arabic, which is transliterated to Roman characters as "al sadaqah."

55. Similarly, HASHIMI and RAHMAN also made contributions to Facilitator-1's PayPal account. HASHIMI sent \$55 to Facilitator-1's PayPal account on May 11, 2021. RAHMAN sent five transfers to Facilitator-1's PayPal account between April 17, 2021 and May 12, 2021. Four transactions totaled 1,558 Israeli New Shekels (approximately \$500) and the fifth transaction was of \$50 in U.S. dollars.

56. Moreover, in approximately May 2021, HASHIMI provided PayPal information to other individuals through Instagram direct messaging. In response to an individual offering to make a donation to a refugee camp in Gaza, HASHIMI provided a link to a PayPal.Me profile with the heading "Pay [Facilitator-1] using PayPal.Me." Notably, this was the same link and title that was posted by Member-2 in Group Chat-1 before YOUSUF posted the link to the Facilitator-1 BTC Address.

57. In March 2021, TAQI used his account at TD Bank to fund contributions to two fundraising campaigns through the Internet-based GoFundMe crowdfunding platform. On or about March 2, 2021, TAQI contributed \$100 to "Widow in Need of Assistance" and on or about March 15, 2021, he contributed \$100 to "Ramadan Appeal for Gaza." According to

records from GoFundMe, both of these fundraising campaigns were created by YOUSUF. A search of an email account controlled by Facilitator-1 revealed a screenshot of a \$100 contribution that had been made through one of the YOUSUF-created GoFundMe campaigns.

58. During the same time period as TAQI's contributions to YOUSUF's fundraising campaigns on GoFundMe, HASHIMI also made contributions to the GoFundMe fundraising campaign created by YOUSUF titled "Ramadan Appeal for Gaza." From on or about March 8, 2021, through on or about March 29, 2021, HASHIMI made four transfers, in which he sent a total of approximately \$364 to the "Ramadan Appeal for Gaza" fundraising campaign.

59. On or about May 26, 2021, RAHMAN created a GoFundMe fundraising campaign titled "Help Rebuild Umm Mohammed's Home." RAHMAN attached her bank account to the GoFundMe campaign. Between June 4, 2021 and October 14, 2021, RAHMAN transferred approximately \$4,822 from the GoFundMe fundraising campaign to her bank account. Notably, I assess that "Umm Mohammed" is a reference to Facilitator-1 because of where the money raised by this GoFundMe campaign was sent and because of the link above between the PayPal campaign for "Umm Mohammad" and the reference to Facilitator-1's name in the title of that PayPal campaign. In addition, a search of an email account associated with Facilitator-1 revealed communications with TAQI in which Facilitator-1 sent TAQI an image of an ISIS flag and a reference to being the recipient of the "Umm Mohammad" donations.

60. On or about October 10, 2021, RAHMAN created a GoFundMe fundraising campaign titled "Help Umm Mohammed Pay for Medical Treatment." Between approximately November 8, 2021, and April 20, 2022, RAHMAN transferred approximately \$4,544 from the GoFundMe fundraising campaign to her bank account.

61. Around the same time, between June 7, 2021 and June 14, 2022, RAHMAN sent \$10,024 over 15 transactions to individuals who appear to be connected to Facilitator-1. Specifically, RAHMAN used Western Union to send \$6,164 over nine transactions to an individual who used the same address as Facilitator-1 in the city of Khan Younis, which is located in Gaza. In addition, RAHMAN sent \$3,860 over six transactions to another person who appears to share a surname with Facilitator-1 and who also resides in the Palestinian Territories.

62. Notably, YOUSUF (using the names “Mohammad Hassan” and “Khalil Yousuf”) created GoFundMe campaigns similar to those created by RAHMAN. Two of those campaigns—“Ramadan Appeal for Gaza” and “Help raise funds for some needy families for Eid”—are referenced above. The other two were titled “Our sister PalestineUmm from Gaza has nothing” and “Help Umm Abdullah.” When GoFundMe asked YOUSUF to provide further information in connection with the “Help Umm Abdullah” fundraising campaign, YOUSUF wrote to GoFundMe that his name was “Khalilullah Yousuf,” and he identified as the recipient of the funds one of the same individuals to whom RAHMAN had sent funds in Gaza, whom he described as a “family friend.” YOUSUF also wrote to GoFundMe that the intended beneficiaries of the GoFundMe campaign were the same individuals to whom RAHMAN sent money from her bank account.

D. Evidence That the Defendants Intended to Support Foreign Terrorist Organizations

63. Facilitator-1’s communications with CHS-1, including his photographs and videos of weapons, ammunitions and grenades destined for ISIS, as well as Facilitator-1’s statements that the references in various fundraising campaigns to raising money for the poor were ruses and that the money was really for the “mujahideen,” make clear that Facilitator-1 represented to the members of the conspiracy that the money he was collecting from them would support ISIS. These communications, together with other evidence obtained during the

investigation and described below, demonstrate that HASHIMI, YOUSUF, TAQI and RAHMAN intended these monetary contributions to support ISIS.

64. Search warrant returns from a search of a Google account belonging to Facilitator-1 revealed images between February and October 2021 associated with Facilitator-1's WhatsApp account that depicted him wearing an ISIS ring, photographs of the ISIS flag, photographs of ISIS cake, and other ISIS propaganda. In addition, the search of the account revealed WhatsApp images indicating that Facilitator-1 had sent screenshots of an Umm Mohammed GoFundMe campaign as well as the Facilitator-1 BTC Address. Facilitator-1 also had in his account images of an account that HASHIMI used on the ECS as well as a screenshot of a conversation between Facilitator-1 and TAQI that included the image of the ISIS flag.

65. Similarly, TAQI's communications with CHS-1, including TAQI's statements that he had donated money to Facilitator-1, that he believed Facilitator-1 was connected to those at the front lines, that Facilitator-1 was "100% Dawlah," that TAQI had stopped sending money because it was risky, and that TAQI hoped and believed an ISIS stronghold in the Middle East could force other Arab governments to fall, show TAQI's knowledge that his contributions were intended to support foreign terrorist organizations.

66. YOUSUF posted a message to Group Chat-1 with the link to the Facilitator-1 BTC Address controlled by Facilitator-1 and the statement, "If anyone wants to donate to actual mujahideen in the battlefield" "This brother is legit^^," thus demonstrating his knowledge that the money donated through that link would support fighters on the battlefield. YOUSUF also created multiple other GoFundMe fundraising campaigns with Facilitator-1 as the recipient.

67. Similarly, HASHIMI engaged in the above-described financial activity with the intent to support foreign terrorist organizations. HASHIMI has used social media

accounts to disseminate jihadist propaganda and to express his support for ISIS and its ideology. HASHIMI registered many of these social media and electronic communications accounts using false names, and provided contact phone numbers and email addresses that he appears to have created to disguise and conceal his true identity and his ownership and control over these accounts.

68. For example, HASHIMI has promoted the teachings of radical Islamic clerics through various social media accounts, including the lectures of Sheikh Faisal, Anwar al-Awlaki and Ahmad Musa Jibril. Based on my training and experience, I am aware that these individuals are imams who have taught extremist interpretations of Islam to Western audiences, and in some cases have spoken favorably of the use of violence against non-believers or have openly spoken of their support for acts of terrorism and terrorists. Notably, Sheikh Faisal was extradited from Jamaica to the United States in August 2020 on charges brought by the Manhattan District Attorney's Office that he supported terrorism in violation of New York State law.

69. In around July 2020, HASHIMI received a direct message from another individual on Twitter that stated, "Can I get more of Shaykh Anwar Al Awlaki's lecture." HASHIMI responded, "Follow the link and you will see it there," "Be careful with who you share it with," and "Don't get in trouble in sha Allah." Based on my training and experience, I am aware that Sheikh Anwar al-Awlaki was a United States-born radical Islamic cleric and prominent leader of al-Qaeda in the Arabian Peninsula who was killed on or about September 30, 2011. Even now, more than ten years after his death, al-Awlaki is still commonly regarded as the leading figure inciting English-speaking Muslims to participate in violent jihad.

70. On or about April 22, 2021, HASHIMI posted on an Instagram account a video of a lecture by Anwar al-Awlaki called "Constants on the Path of Jihad." The next day, HASHIMI sent another individual a direct message referring the individual to the "Constants on

the Path of Jihad” video. Based on my training and experience, I am aware that in that lecture al-Awlaki argued that the concept of “jihad” denoted combat against disbelievers and advocated that all Muslims engage in jihad regardless of where they were located.

71. In a series of direct messages via Instagram between May 23, 2021 and May 25, 2021, HASHIMI wrote to another individual who told him that her parents did not like him that, “Oh it’s ok no one likes people like me except other extremists.” I assess that HASHIMI is acknowledging his extremist views. When the other individual stated that she followed Anwar al-Awlaki’s daughter on Instagram, HASHIMI wrote, “I love her father so much.” HASHIMI also stated in the same series of direct messages that, “I want to get in shape for muj reasons.” I assess that “muj” is a reference to mujahideen, or preparing to engage in jihad.

72. HASHIMI also made social media posts and sent messages through social media accounts evincing support for ISIS and extremist causes.

73. For example, on or about February 27, 2021, HASHIMI used a Twitter account with the handle @TAWHIDcorp and the display name “Tawhid Corporation” to post a tweet in response to a Twitter user who had criticized another tweet as “More ignorance from ISIS fanboy Abu Ibrahim the very guy he is quoting rejected Abu Bakr al Baghdadi and his ‘caliphate.’” HASHIMI replied with a tweet supporting ISIS and former ISIS leader Abu Bakr al-Baghdadi’s self-proclaimed caliphate:



74. In another tweet posted on or about March 16, 2021, HASHIMI stated:



75. Based on my training and experience, I believe that these tweets evince HASHIMI's support for ISIS. First, in Islam the word "tawhid" that is used in the name of HASHIMI's Twitter account refers to the belief in the indivisible oneness of God. I am aware that ISIS supporters who follow an extremist interpretation of Islam use the term "tawhid," and the associated hand gesture of a single index finger pointed up, which is depicted in HASHIMI's profile image, to affirm their support for ISIS's extremist interpretation of "tawhid" which rejects all other religious beliefs, including less extreme interpretations of Islam, as idolatry. Second, I believe HASHIMI was expressing support for the caliphate proclaimed by former ISIS leader Abu Bakr al-Baghdadi when he replied to the other Twitter user's criticism of ISIS and Abu Bakr al-Baghdadi by defending the caliphate and condemning the other user as "munafiq." I am aware that the term "munafiq" is an Arabic word that roughly translates to "hypocrite" and is

commonly used to condemn Muslims who outwardly profess their belief in Islam, but actually reject Islam or adopt practices and beliefs inconsistent with Islam. In context, I believe that when HASHIMI condemned as “munafiq” the Twitter user who criticized ISIS, HASHIMI was expressing support for ISIS and its extremist ideology. Finally, I believe that the phrase “Establish Khilafah or Die Trying” refers to the belief held by supporters of ISIS that Muslims are under a religious duty to fight non-believers to establish a “Khilafah” or “Caliphate” which, in ISIS’s extremist teachings, is a government ruled pursuant to ISIS’s extremist interpretation of Islamic principles and law.

76. On or about April 27, 2021, HASHIMI posted an ISIS media video with two black heart emojis. The video depicted multiple shootings by ISIS members. On or about April 29, 2021, HASHIMI posted an “Inside ISIS” documentary followed by a graphic of the ISIS flag driving out the flags of all the other countries.

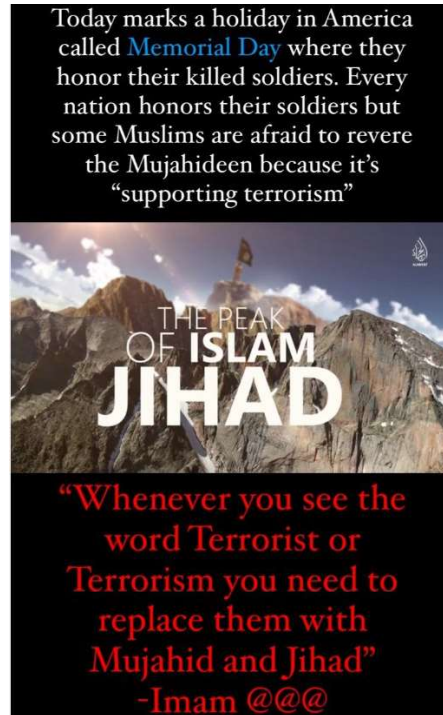
77. In an Instagram direct message on or about May 9, 2021, HASHIMI wrote, “We have a long way to go but there’s hope. I see so many average Muslims wanting jihad. There’s an awakening going on and we were part of one wave of it.”

78. On or about May 17, 2021, HASHIMI posted an Instagram story that included an ISIS propaganda meme (excerpted below) depicting two astronauts wearing space suits in space while looking at the Earth, the first astronaut with the flag of the United States on his arm, and the second astronaut with the ISIS flag on his arm while standing behind the first astronaut and pointing a gun at the first. A text box above the Earth reads “A Pro-Isis Unit has joined other groups launching rockets towards Israel,” while the first astronaut asks “ISIS?” and the second astronaut says “Baqiyah.” Based on my training and experience, I know that the Arabic word “baqiya” translates to “remaining” and is a part of one of ISIS’s most frequently used Arabic slogans, *Baqiya wa tatamaddud*, or “remaining and expanding.” The slogan entered

widespread use in ISIS propaganda in 2015 as a sign of ISIS's resistance to worldwide opposition and as a message to ISIS's supporters to stand firm despite the territorial losses that ISIS had begun to suffer in fighting against coalition military forces. The term is frequently used by ISIS supporters in connection with ISIS affiliates outside of Syria and Iraq.



79. On or about June 1, 2021, HASHIMI posted a photo with text above and below the photograph (reproduced below). The photo depicted a man planting ISIS's flag on the peak of a mountain, with the words "The Peak of Islam JIHAD" superimposed over the mountain. In the upper right-hand corner of the photograph is the logo of the al-Hayat Media Center, which is ISIS's media wing and is responsible for generating pro-ISIS propaganda. Based on my training and experience, I believe the photograph is a still image taken from an ISIS propaganda video. The text above the photograph states: "Today marks a holiday in America called Memorial Day where they honor their killed soldiers. Every nation honors their soldiers but some Muslims are afraid to revere the Mujahideen because it's 'supporting terrorism.'" The text below the photograph states: "'Whenever you see the word Terrorist or Terrorism you need to replace them with Mujahid and Jihad' -Imam@@@". Based on my training and experience, I am aware that ISIS supporters use the Arabic word "mujahid," which translates to "holy warrior," to refer to those who fight for ISIS, and the Arabic word "jihad," which translates to "holy war," to refer to ISIS's violent effort to expand and control territory.



80. On or about June 10, 2021, HASHIMI posted a screenshot of text which stated, among other things, “Brothers and sisters, do not wait for the Islamic State or Mehdi to come to your lands to liberate you or bring Shari’ah to your lands. Do anything that will help Jihad. Start now.” and “It is fine to spread awareness on social media and to support Mujahideen there. But someone has to do beyond social media. Otherwise, it is like everyone sharing that post about needy sisters and none actually donating to her. Money and blood go together.”

81. On or about August 27, 2021, HASHIMI exchanged direct messages with another individual in which they discussed an attack the previous day in which a terrorist detonated a suicide bomb at an airport in Kabul, Afghanistan, the site of an evacuation ahead of the U.S. withdrawal from Afghanistan, that resulted in the deaths of a number of U.S. soldiers and Afghan civilians. The other individual asked whether “dawlah,” which I understand to be a reference to ISIS, had “claim[ed] responsibility for the kabul thing.” HASHIMI responded with an image from the Amaq News Agency depicting a masked individual standing in front of the ISIS flag with a weapon. Asked whether such an attack was justified, HASHIMI responded, “D

doesn't target women and children but if they are in the cross fires it happens. . . . It's a principle called Qisas. Muslims can retaliate for what the Kuffar do to them." Based on my training and experience, I assess HASHIMI's use of the initial "D" to be short for "Dawlah," a common reference to ISIS, and "Qisas" to refer to retaliation in kind. The other individual asked, "and do you just think that the innocents that are killed alongside the kuffar are just part of a sacrifice that needs to be made." HASHIMI responded, "Yes" "War is not pretty" "And people want to establish the rules and conditions of jihad on the mujahideen when the Kuffar have violated every way possible" "This Ummah is one body, people need to stop thinking in terms of one arena" "Kuffar blood is halal." Based on my training and experience, I believe that HASHIMI's statements convey his belief that murdering even innocent persons who do not share his extremist jihadist views ("Kuffar blood") is permissible ("halal").

82. On November 9, 2021, HASHIMI posted a video, the cover image of which appears to show ISIS fighters around a truck that bears the ISIS flag:



83. In addition to promoting ISIS and extremism online, HASHIMI has also made statements suggesting his desire to die in combat for, or in a terrorist attack carried out on behalf of, a foreign terrorist organization, and conducted searches for explosives and firearms.

84. For example, on or about May 2, 2020, HASHIMI searched Google for “phosphorus bombs” and then visited the Wikipedia page for “White phosphorus munitions.”

85. On or about November 19, 2020, a confidential human source for the FBI (“CHS-2”) communicated with HASHIMI over an encrypted communication service. HASHIMI stated to CHS-2 that “I have made up my mind I want to make Hijra to Afghanistan. To join dawla.” Based on my training and experience, I am aware that “hijra” is an Arabic term meaning “migration” that, in jihadist ideology, refers to a Muslim’s religious obligation to migrate to territory controlled by an Islamic caliphate and ruled according to jihadist ideology, and that “dawla” is another reference for ISIS.

86. On or about July 25, 2021, HASHIMI searched for “guns in virginia” and “gun shop northern virginia” and visited the website of a northern Virginia gun store.

87. On or about September 17, 2021, HASHIMI sent an Instagram direct message to another individual in which HASHIMI stated, “I just want Jannah” and “And to die on the battlefield.” In another direct message, the other individual wrote to HASHIMI, “I hope one day I’ll stop missing you when I’m de[a]d and we together in Jannah.” HASHIMI responded, “I hope we make it to Jannah.” Based on my training and experience, I understand “Jannah” to mean paradise or the afterlife.

88. On or about October 17, 2021, HASHIMI exchanged Instagram direct messages with another individual in which HASHIMI stated, “I just want to die anyway” “But on Tawhid.” On or about October 23, 2021, HASHIMI direct messaged the same individual stating, “Also I want to die earlier in age” “As shaheed.” Based on my training and experience, I am aware that “shaheed” means martyr, and I believe that these statements reflect HASHIMI’s desire to be martyred in combat (“Shaheed”) so that he can achieve the paradise (“Jannah”) that jihadists believe awaits martyrs in the afterlife.

89. Two days later, on or about October 25, 2021, HASHIMI searched for “3d metal printer guns” and “ghost gunner” and visited a website for “3D printed guns – what kind of gun can be 3D printed and how it works.”

90. HASHIMI has also provided financial support for numerous individuals who are charged with or have been convicted of federal crimes of terrorism. For example, HASHIMI provided approximately \$225 to “Abu Hamza” in February, March and September 2022 through Vend Engine, an inmate funding service. HASHIMI also gave more than \$2,000 to another terrorism defendant through JPay, a different inmate funding service, between December 2021 and October 2022.

91. In addition, HASHIMI has transferred money to the mother of Amir El Khammache Gabess, who was arrested in July 2020 by Spanish law enforcement for disseminating jihadist propaganda on the Internet and who was found to have edited and disseminated thousands of videos explaining how to make and use homemade weapons. HASHIMI has also transferred money to the prison commissary account of a sentenced defendant who discussed with co-conspirators his desire to participate in violent jihad against American interests and to die on the battlefield, and who was sentenced to serve a 210-month term of imprisonment by the U.S. District Court for the District of Massachusetts in April 2012, following his trial conviction for conspiracy to provide material support to al-Qaeda, providing and conspiring to provide material support to terrorists, conspiracy to commit murder in a foreign country, conspiracy to make false statements to the FBI and two counts of making false statements to the FBI. HASHIMI also discussed through direct messages with another individual contacting and providing money to the prison account of a defendant who was convicted in February 2018 in the U.S. District Court for the Southern District of New York for attempting to provide material support to ISIS by purchasing combat equipment and attempting to travel to Syria to join ISIS, and sentenced in December 2019 to 22 years in prison.

92. Communications between HASHIMI and RAHMAN provide additional evidence that they were aware of the true purpose of the money that they were sending to Facilitator-1. In a series of direct messages between approximately August 16, 2021, and September 26, 2021, RAHMAN told HASHIMI that her father was threatening to report both of them. RAHMAN stated, “Well they googled Shaykh Ahmad’s name and things went badly from there” “When they ask me verbatim ‘did [HASHIMI] show you this’ what exactly can I say. That’s a rhetorical question. I’m just giving you a heads up. So stay woke.” Based on my

training and experience and my knowledge of this investigation, I understand the reference to “Shaykh Ahmad” to refer to Ahmad Musa Jibril.

93. HASHIMI responded in a series of messages, “Did you tell them that you don’t talk to me” “This isn’t funny” “I have responsibilities I cannot get caught up because of your father” “You need to control it” “And keep me out of it.” RAHMAN replied, “Yes” “Am I acting like this is funny” “I obviously don’t want to go to jail either.” Based on my training and experience, I assess that RAHMAN’s reference that she does not want to go to jail reflects her awareness that the money she was donating was an unlawful contribution to support terrorists.

94. Later in their conversation, RAHMAN stated that her parents believed she had been brainwashed by HASHIMI. RAHMAN stated, “I tried telling them I just stumbled upon this [Shaykh Ahmad’s lectures] online and they don’t buy that,” “they ask pointed questions.” After HASHIMI asked RAHMAN what the pointed question was, RAHMAN replied, “Pointed question is ‘did [HASHIMI] show you this.’”

95. HASHIMI responded that RAHMAN should lie to protect him: “How do they still know my name” “And you can lie to protect me from harm” “Don’t take it as empty threats” “People report their children” “Just lie if you have to” “Because now we know they mean harm.” HASHIMI also told RAHMAN to tell her parents that Sheikh Ahmad was a high-level scholar, not a terrorism supporter, and that RAHMAN should tell her parents that she believed in certain creeds and that her “bay’ah is to Allah and Allah alone” not to any specific groups.

96. On or about July 25, 2021, RAHMAN registered an account on the Internet Archive (archive.org) under the username “puredeen.” Using that account, RAHMAN “favorited” various users and media, including “KHALIFAH: SURVIVE AND REVIVE,” which has as its profile picture an image of an ISIS flag. Based on my training and experience, I

understand “survive and revive” to be a reference to ISIS’s *Baqiya wa tatamaddud*, or “remaining and expanding” slogan.

97. On or about August 25, 2021, HASHIMI and RAHMAN discussed a defendant who was then incarcerated at Rikers Island in New York City on New York State terrorism charges brought by the Manhattan District Attorney’s Office. HASHIMI stated, “I’ve been looking for him since he was arrested and never thought to search rikers” “His inmate # isn’t working on JPay.” After locating the defendant’s prison information, HASHIMI stated on or about September 4, 2021, “I tried to contact [the defendant] and it won’t allow me to email him nor will it allow me to send him funds” “I may write a letter.” After RAHMAN expressed interest in visiting the defendant, HASHIMI responded, “Kinda risky” “He’s not an average inmate.” HASHIMI advised RAHMAN “That any contact with [defendant] will be monitored” and “No need to ruin your changes of hijra” “Chances*” Based on my training and experience, I am aware that “hijra” is often used in this context to refer to traveling to join ISIS in Syria, and I assess HASHIMI is advising RAHMAN that visiting the defendant will put her on a law enforcement watchlist that will preclude her from traveling from the U.S. in a later effort to join ISIS.

98. On or about September 17, 2021, HASHIMI and RAHMAN again discussed RAHMAN’s parents. RAHMAN stated, “My dad is threatening to kick me out.” She added, “My parents looked at my email and bank account” “The real incriminating stuff is on [ECS] 😬,” which I assess to be an acknowledgment that RAHMAN had engaged in incriminating communications. RAHMAN continued, “Can you help me plan” “I am a térrörist to them.”

99. HASHIMI provided RAHMAN with Sheikh Ahmad’s phone number and suggested that she reach out to him. RAHMAN expressed concern about contacting Sheikh

Ahmad because her parents might go through her phone records, but stated that she would contact him. On or about September 25, 2021, RAHMAN stated she had talked to Sheikh Ahmad, that he had advised her “to avoid dawah if it’s making [her parents] more hostile and try to get married or just get out.” RAHMAN expressed concern that “fbi is tapping his phone” and stated she had “used vague language.”

100. On or about September 24, 2021, RAHMAN emailed to herself extremist jihadist and ISIS content that included a 2013 issue of Inspire magazine, a 2014 collection of biographies of martyrs in Syria, and a 2016 ebook called “Black Flags from the Islamic State.” RAHMAN subsequently deleted the emails from her account.

101. On or about October 16, 2021, RAHMAN emailed to herself links to works by extremist preachers Sheikh Faisal, Ahmad Musa Jibril and Anjem Choudary, among others. A search of an iCloud account belonging to RAHMAN also revealed contact information for Jibril and Choudary in RAHMAN’s contacts.

WHEREFORE, your deponent respectfully requests that arrest warrants be issued for the defendants MOHAMMAD DAVID HASHIMI, ABDULLAH AT TAQI, KHALILULLAH YOUSUF, and SEEMA RAHMAN so that they may be dealt with according to law.

IT IS FURTHER REQUESTED that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including this complaint and the arrest warrants, with the exception that the complaint and arrest warrants be unsealed for the limited purpose of disclosing the existence of, or disseminating, the complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendants or to secure the defendants’ arrest, extradition or expulsion. The premature disclosure of the contents of this

complaint and the arrest warrants would seriously jeopardize the investigation by giving the defendants an opportunity to flee from or evade prosecution, destroy or tamper with evidence, harm or threaten witnesses, change patterns of behavior, and notify confederates.



MELISSA A. GALICIA
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
13 day of December, 2022



THE HONORABLE CHERYL L. POLLAK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK