ORDERED UNSEALED on 06/16/2026 s/ judepeters
SEALED

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

ARREST ON OUT-OF-DISTRICT OFFENSE

CASE NUMBER: '26 MJ3580

The person charged as REDA MAZEN RIDA SABASSI now appears before this United States District Court for an initial appearance as a result of the following charges having been filed in the United States District Court for the Southern District of New York with: Conspiracy to Provide Material Support to a Foreign Terrorist Organization, in violation of 18 U.S.C. § 2339B; Conspiracy to Violate the International Emergency Economic Powers Act; in violation of Title 50, United States Code, Section 1705; Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349; Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956; and False Statements, in violation of 18 U.S.C. § 1001.

The charging documents and warrant for the arrest of the defendant which was issued by the above United States District Court are attached hereto.

I hereby swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

DATED: June 16, 2026

/s/ Joshua Desrosiers
Joshua Desrosiers
Special Agent
Federal Bureau of Investigation

Reviewed and Approved

Dated: _____
Shane P. Harrigan
Assistant United States Attorney

U.S. Department of Justice

United States Attorney
Southern District of New York

26 Federal Plaza
New York, New York 10278

June 16, 2026

BY EMAIL
The Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Reda Mazen Rida Sabassi*, 26 Mag. 2344

Dear Judge Cave:

The Government writes to respectfully request that the Court unseal the above-referenced complaint and arrest warrant, as we have been advised that the defendant has been arrested.

Respectfully submitted,

JAY CLAYTON
United States Attorney

by: __/s/_____
Jennifer N. Ong
Assistant United States Attorney
(212) 637-2224

SO ORDERED:

_____
HONORABLE SARAH L. CAVE
UNITED STATES MAGISTRATE JUDGE

DATE: 6/16/2026

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

REDA MAZEN RIDA SABASSI,

Defendant.

26 MAG 2344

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1001, 1349, 1956, 2339B; 50 U.S.C. § 1705

SOUTHERN DISTRICT OF NEW YORK, ss.:

SCHUYLER KENNEY, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO A FOREIGN TERRORIST ORGANIZATION)

1. From at least in or about 2022 up to and including in or about March 2024, in the Southern District of New York and elsewhere, REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, 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, Hamas, which was designated by the U.S. Secretary of State as a foreign terrorist organization on or about October 8, 1997, 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 Complaint.

2. It was a part and an object of the conspiracy that REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, would and did knowingly provide Hamas with material support and resources, including services, property, and personnel, knowing that Hamas was a designated terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that Hamas engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that Hamas 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)(A), (d)(1)(D), (d)(1)(E), and (d)(1)(F).)

COUNT TWO
(CONSPIRACY TO VIOLATE THE INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT)

3. From at least in or about 2022 up to and including in or about March 2024, in the Southern District of New York and elsewhere, REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to violate, and to cause a violation of, licenses, orders, regulations, and prohibitions issued under the International Emergency Economic Powers Act ("IEEPA"), 50 U.S.C. §§ 1701-1708.

4. It was a part and an object of the conspiracy that REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, would and did cause U.S. persons to engage in transactions and dealings in property and interests in property of persons whose property and interests in property are blocked pursuant to the Global Terrorism Sanctions Regulations ("GTSR"), including Hamas, without first obtaining the required approval of the United States Department of the Treasury, Office of Foreign Assets Control ("OFAC"); and to evade the requirements of U.S. law with respect to transactions and dealings in property and interests in property of Hamas, in violation of Executive Order 13224 and Title 31, Code of Federal Regulations, Sections 594.201, 594.204, and 594.205.

(Title 50, United States Code, Section 1705; Executive Order 13224; Title 31, Code of Federal Regulations, Sections 594.201, 594.204, and 594.205.)

COUNT THREE
(CONSPIRACY TO COMMIT WIRE FRAUD)

5. From at least in or about 2022 up to and including in or about March 2024, in the Southern District of New York and elsewhere, REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

6. It was a part and an object of the conspiracy that REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, having devised and intending to devise a scheme or artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme or artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349)

COUNT FOUR
(CONSPIRACY TO COMMIT MONEY LAUNDERING)

7. From at least in or about 2022 up to and including in or about March 2024, in the Southern District of New York and elsewhere, REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, intentionally and knowingly combined, conspired, confederated and agreed together and with each other to commit money laundering, in violation of Title 18, United Stats Code, Section 1956(a)(2)(A).

8. It was a part and object of the conspiracy that REDA MAZEN RIDA SABASSI, the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, monetary instruments and funds to places in the United States from and through places outside the United States, and to places outside the United States from and through places in the United States, in amounts exceeding $10,000, with the intent to promote the carrying on of specified unlawful activity, to wit, the conspiracy to provide material support to Hamas and to violate IEEPA as charged in Counts One and Two of this Complaint, and (b) wire fraud, in violation of Title 18, United States Code, Section 1343, which are in violation of Title 18, United States Code, Section 1956(a)(2)(A).

(Title 18, United States Code, Sections 1956(h) and 1956(f))

COUNT FIVE
(FALSE STATEMENTS)

9. On or about March 27, 2024, in the Southern District of New York and elsewhere, REDA MAZEN RIDA SABASSI, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, to wit, during an interview with Special Agents from the Federal Bureau of Investigation, SABASSI falsely stated, in sum and substance, that (i) he did not know or talk to a co-conspirator not named as a defendant herein ("CC-1"), (ii) he never sent money to CC-1 or members of CC-1's family, and (iii) he did not spend any money from his fundraising campaigns on personal expenses, when in truth and fact, SABASSI knew and communicated with CC-1, transferred money to CC-1 and a member of CC-1's family on multiple occasions, and spent money from his fundraising campaigns to make payments toward his personal credit card and rent.

(Title 18, United States Code, Section 1001(a)(2).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

10. I am a Special Agent with the FBI, assigned to investigate counterterrorism matters, including counterterrorism investigations involving crimes against the United States and U.S. citizens occurring outside the United States. Based on my training and experience, I have become knowledgeable about criminal activity, particularly violations of the federal terrorism, fraud, and money laundering statutes. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers and

other individuals; my participation in voluntary interviews of REDA MAZEN RIDA SABASSI, the defendant, on March 26 and 27, 2024; my review of email, cloud, and social media accounts used by SABASSI and others pursuant to judicially authorized search warrants; my review of devices used by SABASSI pursuant to judicially authorized search warrants; my review of devices seized from CC-1; my review of pen register data; my review of financial records and records from crowdfunding websites; and my review of publicly available materials. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses cited above, it does not include all the facts that I have learned during the course of the investigation. Where the contents of conversations with others and statements by others are reported herein, they are reported in substance and in part, except where otherwise indicated. Some of the information recounted below is based on draft translations of statements written in Arabic, which are subject to revision, and in some cases, I have indicated my interpretation of certain words or phrases in brackets, which interpretations are based on the context in which they appear as well as, among other things, my training and experience. Finally, to the extent there are grammatical, typographical, or spelling errors in any quotations in this affidavit, those errors appear in the original quoted material.

OVERVIEW

11. The offenses charged herein relate to conduct undertaken on behalf of the terrorist organization Hamas. As described below, Hamas is dedicated to the violent eradication of the State of Israel. Hamas also promotes attacks against the United States and its citizens and interests because of U.S. diplomatic and military support for Israel. Hamas relies on and celebrates violent attacks against civilians and civilian populations and hostage taking as the primary means for pursuing its goals. Hamas's terrorist tactics include detonating explosives, including suicide bomb attacks, in civilian neighborhoods; small arms and knife attacks against civilians and police; and firing short-range rockets and mortars at civilian towns and communities. Hamas has carried out numerous deadly attacks over the years, resulting in the injury and death of thousands of individuals, including numerous American victims.

12. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of video recordings, documents, and publicly available information, and my training and experience, I have learned, among other things, that:

a. On October 7, 2023, Hamas committed its most violent, large-scale terrorist attack to date (the "October 7 Hamas Massacres"). In the early morning hours of October 7, 2023, Hamas sent more than 2,000 armed fighters into farms and towns in southern Israel, where they carried out the massacres of over a thousand people and the kidnappings of more than 200 others. Hamas terrorists attacked civilians, firing handguns, assault rifles, and handheld rocket launchers, in small residential communities in Kfar Aza, Be'eri, Nir Oz, Nahal Oz, Re'im, Holit, Zikim, Kerem Shalom, Sufa, and others; the Israeli town of Sderot; and a music festival held near Re'im; among other places.

b. Hamas raises money to fund its terrorist activities through a variety of methods, including by soliciting and receiving cryptocurrency payments, advertising the ostensible anonymity of such transactions. In addition, Hamas has relied on purported "charitable" organizations and efforts, located around the world, to raise money, including through the social

media accounts of these "charitable" organizations and on crowdfunding website or remittance platforms. As explained in more detail below, some of these "charitable" organizations are mere fronts for Hamas fundraising or serve a dual purpose in providing funding for Hamas and raising money for otherwise charitable pursuits.

c. As set forth in more detail below, REDA MAZEN RIDA SABASSI, the defendant, is a naturalized U.S. citizen living in San Diego, California. Since at least in or about 2022, SABASSI has operated a putative charity called Ikram – The Arab Charity Foundation Inc. ("Ikram"). SABASSI has used Ikram to solicit donations from individuals around the world, including from individuals in the United States and the Southern District of New York, purportedly to provide humanitarian aid to people in Gaza and to orphans related to CC-1. In reality, SABASSI has diverted some of those funds to support Hamas and some of those funds for personal expenses.

I. BACKGROUND ON HAMAS

A. Hamas's Founding, Structure, and Objectives

13. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of video recordings, documents, and publicly available information, and my training and experience, I have learned, among other things, that:

a. "Harakat al-Muqawamah al-Islamiyya" is Arabic for "Islamic Resistance Movement" and is known by the acronym Hamas. Hamas, which is sometimes referred to by its followers as "The Movement," is a terrorist organization based principally in the self-governing Gaza Strip and Palestinian West Bank territories.

b. Hamas was founded in 1987 by Sheikh Ahmed Yassin as an outgrowth of the Palestinian branch of the Muslim Brotherhood. The Muslim Brotherhood is an international Islamic organization founded in Egypt in 1928 and is committed to the globalization of Islam through social engineering and violent jihad. Hamas's founding occurred shortly after the December 1987 outbreak of violence in the first Palestinian intifada, or "uprising," throughout Israel, the Gaza Strip, and the West Bank.

c. In 1988, Hamas issued a charter, formally known in English as the "Covenant of the Islamic Resistance Movement," which identified Hamas as the Muslim Brotherhood in Palestine and stated that Hamas's purpose was to create an Islamic Palestinian state throughout Israel by eliminating the State of Israel through violent jihad. This original Hamas charter began, "Israel will exist and will continue to exist until Islam will obliterate it, just as it obliterated others before it." The charter directed the killing of Jews, drawing on a hadith (a "prophetic saying" in Islam): "The Day of Judgment will not come about until Muslims fight Jews and kill them. Then, the Jews will hide behind rocks and trees, and the rocks and trees will cry out: 'O Moslem, there is a Jew hiding behind me, come and kill him.'"

d. In 2017, Hamas issued a revised charter, entitled in English as "A Document of General Principles & Policies." The revised charter asserts that "Palestine," by which Hamas means the territorial area of Israel, the West Bank, and Gaza, "is a land that was seized by a racist, anti-human and colonial Zionist project that was founded on a false

promise." The charter also codifies Hamas's commitment to violence, which Hamas calls "armed resistance," explaining that "resisting the occupation," *i.e.*, the State of Israel, "is a legitimate right guaranteed by divine laws and by international norms and laws," and that "[a]t the heart of these lies armed resistance[.]" Shortly after Hamas issued its revised charter, one of its leaders stated that "the new document will undermine neither our principles nor our strategy."

e. Hamas refers to its highest-ranking leadership body as its Political Bureau or "Politburo." The Politburo is responsible for setting policies and guidelines for Hamas's activities, including directing and coordinating terrorist acts. By design, high-ranking members of the Politburo have typically lived outside the Gaza Strip and the West Bank, in Syria, Qatar, Turkey, and elsewhere.

f. Hamas carries out terrorist attacks and armed conflict through the Izz al-Din al-Qassam Brigades (the "al-Qassam Brigades"), its military wing. The al-Qassam Brigades conduct suicide bombings and other terrorist attacks within Israel, Gaza, and the West Bank, and have done so for decades. These attacks have included large-scale bombings against Israeli civilian targets, small-arms attacks, improvised roadside explosives, and rocket attacks. The al-Qassam Brigades frequently target civilians and have killed and injured thousands of individuals, including American citizens.

g. Hamas generates loyalty and support for the organization, its overall goals, and the operations of the al-Qassam Brigades through, among other means, a social wing. In particular, Hamas supports religious and academic institutions that advance the extremist teachings of Hamas and introduce its radical and violent ideology to children and adults at their earliest stages of spiritual and educational development. This strategy also enhances Hamas's ability to recruit supporters into its military wing. Hamas rewards terrorist acts, and provides incentives for perpetrating such acts, including by paying family members of Hamas operatives who are killed, injured, or imprisoned, and ensuring that the operatives' families are revered in the community.

h. Hamas disseminates propaganda through a variety of means, notably through a satellite television channel called "al-Aqsa TV," which is based in the Gaza Strip. "Al-Aqsa" is the Arabic name for the compound of Islamic religious buildings in Jerusalem that includes the Dome of the Rock mosque, built in approximately 691 A.D. on the site of the Temple Mount.

i. On or about September 3, 2024, this Office unsealed a criminal complaint from February 2024, charging Hamas leaders Ismail Haniyeh ("Haniyeh"), Yahya Sinwar ("Sinwar"), Mohammad al-Masri, a/k/a "Mohammed Deif" ("al-Masri"), Marwan Issa ("Issa"), Khaled Meshaal ("Meshaal"), and Ali Baraka ("Baraka") with various material support and terrorism charges arising from, among other things, their leadership roles in Hamas and their roles in the October 7 Hamas Massacres. *See United States v. Haniyeh et al.*, 24 Mag. 438. Since that complaint was sworn out, according to public reports, including announcements by Hamas, Haniyeh, Sinwar, al-Masri, and Issa have all been killed. Meshaal and Baraka are still alive and remain at large.

B. Hamas's Use of Social Media Accounts

14. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of video recordings, documents, and publicly available information, and my training and experience, I have learned, among other things, that:

a. Hamas has used its online presence and social media accounts to disseminate propaganda about and promote Hamas's violent activities and aims. More recently, Hamas has used its online presence and social media accounts to, among other things, broadcast portions of, glorify, and celebrate, the October 7 Hamas Massacres. Some of the Hamas terrorists who carried out the October 7 attacks strapped cameras to their heads and videotaped certain of the violence they carried out against civilians and soldiers and then posted those videos on social media accounts.

b. Since the October 7 Hamas Massacres, Hamas has continued to use its social media accounts to promote its terrorist agenda and spread propaganda. For example, an array of content has been posted on Hamas-linked social media channels that, among other things, calls on supporters around the world to rise up against Israel and its allies, and glorifies Hamas terrorists who have been killed in the Gaza Strip since the October 7 Hamas Massacres. Hamas-linked social media channels have also republished statements made by certain of its senior leaders in support of the October 7 Hamas Massacres and of Hamas's ongoing efforts to wage jihad against Israel and its Western allies.

c. In addition to disseminating propaganda and espousing violent activities, Hamas and its supporters use their social media accounts to solicit and raise funds, including cryptocurrency, for the FTO.

C. Hamas's Use of Cryptocurrency and Fundraisers to Finance Its Terrorist Activities

15. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of video recordings, documents, and publicly available information, and my training and experience, I have learned, among other things, that:

a. In addition to receiving funding and support from the Government of Iran and Hizballah, a Lebanon-based Shia Islamic terrorist organization founded in the early 1980s with support from Iran, the al-Qassam Brigades have also solicited and received funding to promote Hamas's terrorist activities through cryptocurrency payments, advertising the ostensible anonymity of such transactions. Beginning in or about 2019, the al-Qassam Brigades issued a call on their social media page for Bitcoin donations to help fund Hamas's campaign of terror. These websites explained to supporters how to make Bitcoin donations anonymously and boasted that Bitcoin donations were untraceable and would be used for violent causes. Through these mechanisms, Hamas has received tens of millions of dollars in cryptocurrency payments to fund its activities.

b. Following the 2019 solicitation, the al-Qassam Brigades' efforts to finance Hamas's terror campaign through cryptocurrency donations continued despite disruptive

actions by the U.S. and Israeli governments. For example, in or about September 2020, one month following the United States's seizure of hundreds of cryptocurrency accounts and websites used and controlled by the al-Qassam Brigades in connection with their terrorist activities, the al-Qassam Brigades issued another global call for donations, using an email address that included a reference to the al-Qassam Brigades. This fundraising campaign by Hamas's Military Media solicited donations using this email address with a reference to the al-Qassam Brigades and the following hashtag: "#support_the_resistance." One of the Arabic posts states "#support_the_resistance with your money," and a citation from the Quran to encourage mobilization and donation: "March forth whether it is easy or difficult for you and strive with your wealth and your lives in the cause of God. That is best for you, if only you knew."

c. By July 2021, following Hamas's attacks on Israel earlier that year, cryptocurrency wallets affiliated with a Hamas fundraising campaign seized by Israeli government authorities had received more than $7.3 million worth of contributions, and held a variety of cryptocurrencies, including Bitcoin, Tether, Ether, Tron, and Dogecoin.

d. Based on my review of publicly available materials, I have learned that while the al-Qassam Brigades announced a hiatus in cryptocurrency fundraising in or about April 2023, supporters have continued to solicit and fund Hamas's Gaza-based terrorist activities through cryptocurrency financing. For example, as explained below, prior to the October 7 Hamas Massacres, an administrator of Gaza Now posted a cryptocurrency wallet address to the social media network Telegram seeking funding for "brothers" and followed by a post with a photograph of a terrorist fighter.[1] Gaza Now, a Hamas-affiliated company, has raised hundreds of thousands of dollars' worth of cryptocurrency in total and continued to solicit cryptocurrency financing after the October 7 Hamas Massacres on other social media platforms, specifically suggesting methods to followers to avoid interdiction by Israeli authorities.

e. In addition, Hamas has long abused the trust of the international community and public support for legitimate humanitarian causes to fund their terrorist activities and commit acts of violence by raising funds through nonprofit organizations or charities. Hamas has entirely co-opted and run nonprofit organizations or charities while obscuring the links between these organizations and Hamas in order to evade sanctions. Moreover, Hamas has relied on purported "charitable" organizations and efforts, located around the world, to raise money, including through the "charitable" organizations' own social media accounts. Some of these "charitable" organizations are mere fronts for Hamas fundraising or serve a dual purpose in providing funding for Hamas and raising money for otherwise charitable pursuits. This allows Hamas to exploit the sympathy and generosity of the international public at the expense of the Palestinian people.

D. Previous Terrorist Attacks by Hamas

16. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of video recordings, documents, and publicly available

[1] In this context, I understand "brothers" to refer to Hamas based on my training and experience, participation in this investigation, conversations with other law enforcement officers, and open-source materials.

information, and my training and experience, I have learned, among other things, that prior to the October 7 Hamas Massacres, Hamas carried out numerous other violent terrorist attacks, many of which resulted in the deaths of Americans, including:

a. In early 1996, Hamas suicide bombers conducted two separate attacks on two buses on Jaffa Road in Jerusalem. First, on or about February 25, 1996, a Hamas suicide bomber blew himself up on a bus traveling down Jaffa Road near the Jerusalem Central Bus Station. Approximately one week later, on or about March 3, 1996, a second Hamas suicide bomber boarded another bus in Jerusalem and detonated an explosive belt. Three U.S. citizens were killed in these attacks. Hamas publicly claimed credit for both suicide attacks.

b. On or about July 30, 1997, two Hamas suicide bombers detonated explosive devices in an open-air market in Jerusalem. One U.S. citizen was killed and one U.S. citizen was wounded in the attack.

c. On or about September 4, 1997, three Hamas suicide bombers detonated explosive devices at a pedestrian mall in Jerusalem. One U.S. citizen was killed and ten U.S. citizens were wounded in the attack.

d. On or about August 9, 2001, a Hamas suicide bomber detonated an explosive device at a pizzeria in downtown Jerusalem. Three U.S. citizens were killed, and three U.S. citizens were injured in the attack.

e. On or about March 27, 2002, a Hamas suicide bomber detonated an explosive device at the Park Hotel in Netanya, Israel, during a Passover seder. This Hamas terrorist attack came to be known as the "Passover Massacre." The bomber, disguised as a woman, approached the hotel carrying a suitcase filled with explosives, which he detonated. Many of the victims were more than 70 years old, and some were survivors of the Holocaust. Then-Hamas spokesman Usama Hamdan, who is not named as a defendant herein, stated afterward that "[t]his is a trial [*i.e.*, a precursor attack] to send a letter, to send a message, to tell all the world that we are trying to fight for our own freedom against a terrorist government in Israel," and that Israelis "have to expect these attacks from everywhere, from every Palestinian group."

f. On or about July 31, 2002, Hamas operatives detonated a bomb in the cafeteria of Hebrew University's Mount Scopus campus in Jerusalem. Five U.S. citizens were killed, and four U.S. citizens were wounded in the attack. Hamas claimed responsibility for the terrorist attack during celebrations that followed in Gaza City within the Gaza Strip.

g. On or about June 12, 2014, Hamas operatives kidnapped three teenagers, including one U.S. citizen, in Gush Etzion in the West Bank between Jerusalem and Hebron, Israel. On or about June 30, 2014, the bodies of the three teenagers were found buried just north of Hebron; all three had been shot and killed. On or about August 19, 2014, Saleh al-Aroui ("al-Arouri"), who is not named as a defendant herein, delivered a speech at a conference in Istanbul, Turkey, which was broadcast on a Qatari television station, in which he discussed the abductions. At the outset of the speech, a moderator of the conference explained that "the address of the great mujahid Abu al-Waleed, Khaled Mash'al, who leads this resistance along with his brothers in the land of steadfastness, will be delivered on his behalf by the mujahid Saleh Al-

'Arouri." In the speech, al-Arouri claimed credit for the killing of the three teenagers on behalf of Hamas, referring to the attack as a "heroic operation, carried out by the al-Qassam Brigades, in which three settlers were captured in Hebron." Al-Arouri dispelled claims that Hamas had not committed the attack, stating: "That's not true. Your brothers in the al-Qassam Brigades carried out this operation to support their imprisoned brothers, who were on a hunger strike. The occupation wanted us to watch them die and to do nothing. The mujahideen[2] captured these settlers in order to have a swap deal," indicating that Hamas had orchestrated the attack in order to hold, among others, an American citizen hostage for ransom.

h. On or about October 1, 2015, Hamas gunmen murdered an American citizen and his wife in their car near the Palestinian village of Beit Furik in the West Bank. The family's four young sons, including a nine-month-old infant, were in the backseat of the car during the shooting but survived. In a public statement, Hamas praised the "heroic attack" and called for "more high-quality attacks."

E. The Designation of Hamas as a Terrorist Organization Since 1997

17. On October 8, 1997, the U.S. Secretary of State designated Hamas as an FTO under Section 219 of the Immigration and Nationality Act. The Secretary of State has also listed the following aliases for Hamas: Islamic Resistance Movement, Harakat al Muqawma al-Islamiya, Students of Ayyash, Students of the Engineer, Yahya Ayyash Units, Izz Al-Din Al-Qassim Brigades, Izz Al-Din Al-Qassim Forces, Izz Al-Din Al Qassim Battalions, Izz al-Din Al Qassam Brigades, Izz al-Din Al Qassam Forces, and Izz al-Din Al Qassam Battalions. Hamas was one of the original FTOs designated as part of the Secretary of State's first exercise of authority under the Immigration and Nationality Act, and, to date, Hamas remains a designated FTO.

18. On October 31, 2001, the U.S. Secretary of State also designated Hamas as a Specially Designated Global Terrorists ("SDGT") under Executive Order 13224.

F. The International Emergency Economic Powers Act

19. The IEEPA confers upon the President authority to deal with unusual and extraordinary threats to the national security and foreign policy of the United States. Section 1705 provides, in part, that "[i]t shall be unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of any license, order, regulation, or prohibition issued under this title." 50 U.S.C. § 1705(a).

[2] "Mujahideen" is an Arabic term often used for those who have pledged to wage jihad, or holy war, and which has been adopted by terrorist organizations such as Hamas to refer to militants who commit acts of terrorism.

The Global Terrorism Sanctions Regulations

20. On September 23, 2001, the President issued Executive Order 13224, providing that all property and interests in property in the United States of persons determined to have committed or to pose a significant risk of committing acts of terrorism that threaten U.S. nationals or the national security, foreign policy, or economy of the United States, or determined to act for or on behalf of such persons or to assist in, sponsor, or provide financial, material, or technological support for, or financial or other services to or in support of, such acts of terrorism or such persons—designated as Specially Designated Global Terrorists ("SDGTs")—are blocked. Executive Order 13224 authorized the U.S. Secretary of the Treasury to promulgate rules and regulations necessary to carry out the Executive Order. Pursuant to this authority, the Secretary of the Treasury promulgated the GTSR, implementing the sanctions imposed by the Executive Order.

21. Title 31, Code of Federal Regulations, Section 594.201(a) of the GTSR provides, in relevant part:

> [P]roperty and interests in property of [SDGTs] that are in the United States, that hereafter come within the United States, or that hereafter come within the possession or control of U.S. persons, including their overseas branches, are blocked and may not be transferred, paid, exported, withdrawn or otherwise dealt in . . .

without a license from OFAC.

22. Section 594.204 of the GTSR further prohibits any U.S. person from engaging in any transaction or dealing in property or interests in property of persons whose property or interests in property are blocked pursuant to the GTSR. In particular, the GTSR specifically prohibits the making of any contribution or provision of funds to, by, or for the benefit of designated SDGTs. On October 31, 2001, the Department of State designated Hamas as an SDGT pursuant to Executive Order 13224.

23. Section 594.205 of the GTSR further prohibits attempts and conspiracies to violate or to evade the prohibitions of the GTSR.

II. THE DEFENDANT

24. As set forth in more detail below, based on my participation in this investigation, conversations with other law enforcement officers, my judicially authorized review of electronic communication accounts used by REDA MAZEN RIDA SABASSI, the defendant, my participation in voluntary interviews of SABASSI, my review of publicly available materials, my review of materials from electronic communication accounts and devices used by SABASSI and CC-1 pursuant to judicially authorized search warrants, and my review of financial records, I have learned that SABASSI, a naturalized U.S. citizen fluent in Arabic, has raised funds for Hamas and helped others raise funds for Hamas. Specifically, as explained in more detail below, SABASSI is the Chief Executive Officer, Chief Financial Officer, and Secretary of Ikram, a purported charity based in San Diego, California. Using Ikram, SABASSI has worked with CC-1

to raise funds for purported charitable causes in Gaza. SABASSI directed some of those funds to CC-1, or others at CC-1's direction, to be used for Hamas and diverted other funds for his own personal use.

A. Sabassi Publicly Supports Hamas Online

25. REDA MAZEN RIDA SABASSI, the defendant, has publicly supported Hamas online. Based on my participation in voluntary interviews of SABASSI, my review of publicly available posts to certain social media accounts used by SABASSI, and my review of those accounts pursuant to judicially authorized search warrants, I have learned that SABASSI operates several social media accounts, including X accounts referred to herein as "Sabassi Account-1", "Sabassi Account-2", and "Sabassi Account-3" (collectively, the "Sabassi Accounts"). SABASSI has used the Sabassi Accounts to post Hamas propaganda and provide that material to others.[3] For example, based on my review of publicly available materials and records from X, I have learned the following, in substance and in part:

a. The profile photo for Sabassi Account-1 appears to be a photo of Sinwar[4], the former leader of Hamas who was killed on or about October 16, 2024, that was taken during the final moments of Sinwar's life and thereafter made publicly available.

b. On or about October 10, 2023, just three days after the October 7 Hamas Massacres, Sabassi Account-1 posted a video with the text: "'Handala' is a program that revives the works of the late Palestinian Arab cartoonist Naji Al-Ali in an animated cartoon style . . . #AlAqsaFlood #Gaza_Genocide #filasteenNFT."[5] "Operation Al-Aqsa Flood" was the name that Hamas gave to the October 7 Hamas Massacres. On or about October 20, 2023, this post was re-posted on Sabassi Account-2 and Sabassi Account-3.

c. On or about November 26, 2023, a user (not SABASSI) posted a short, animated video of cats wearing green headbands with Arabic writing firing rocket propelled grenades at tanks in a manner consistent with videos posted on official al-Qassam Brigades social media pages of actual Hamas fighters shooting at Israeli tanks. These animated cats appear to be dressed as if they are members of Hamas's al-Qassam Brigades. At the request of another user responding to that post, on or about November 30, 2023, Sabassi Account-1 provided a link to an

[3] Some of these posts have been removed from their respective accounts. I viewed removed materials described herein before they were removed and preserved copies of those removed materials.

[4] On September 8, 2015, the Department of State designated Sinwar as an SDGT pursuant to Executive Order 13224.

[5] Based on open-source materials, my training and experience, and my participation in this investigation, I understand that Handala is a character created by a political cartoonist which depicts a young Palestinian refugee, tattered and back turned, and with bare feet. Handala is a national symbol and personification of the Palestinian people. I also understand that SABASSI has used Handala characters to solicit donations, including versions of the character carrying a firearm.

image of these cats, which SABASSI called "Hamas kitties," that could be posted on another social media site.

d. On or about March 13, 2024, SABASSI posted to Sabassi Account-1, in English: "Al-Aqsa Flood: The complete footage of the October 7th attacks. Including promos, trailers and body-cam footage. Sourced from the official [social media] channel of Qassam Brigades the military wing of Hamas." This post embedded an approximately one hour-long video of graphic violent acts, including murder, carried out by members of Hamas, consistent with the October 7 Hamas Massacres. Sabassi Account-1 re-posted this original post on or about October 7, 2025 (*i.e.*, the two-year anniversary of the October 7 Hamas Massacres) with the caption: "The Raw Footage #ParamountPlus #Red Alert #October7th."

e. On or about March 19, 2024, SABASSI, using Sabassi Account-2, replied to another user and re-posted the March 13, 2024 post from Sabassi Account-1 of the footage of the October 7 Hamas Massacres. *See supra* ¶ 25(d). SABASSI also included the following caption in Sabassi Account-2's re-posting: "here is a one hour footage…it's no secret."

f. On or about January 15, 2025, in response to a post announcing that an Israeli official said a ceasefire-hostage deal may be reached the next day, SABASSI, using Sabassi Account-1, commented: "Israel using trump as an excuse to save face and withdraw after getting their asses handed to them by hamas...there will be no peace until the zionist entity is dismantled." Based on my training and experience and my participation in this investigation, I understand SABASSI's reference to "dismantling" the "Zionist entity" to mean destroying the State of Israel by force.

g. On or about January 14, 2026, SABASSI, using Sabassi Account-1, reposted a post from another user. That post contained an approximately 3-minute-long video, which, as explained in the post's caption, was generated using artificial intelligence and simulated the life of the former spokesperson for the al-Qassam Brigades Hudhayfa al-Kahlout.[6] The video glorified al-Kahlout's life as well as Hamas and al-Qassam Brigades fighters. The post also encouraged people to teach their children the biographies of these "great figures."

h. On or about March 29, 2026, SABASSI posted to Sabassi Account-1 a screenshot of another social media post depicting former Hamas leader Sinwar with a gun and with the caption: "We won't discuss recognizing Israel, only wiping it out."

26. In addition, REDA MAZEN RIDA SABASSI, the defendant, supported Hamas in other online forums. During his March 27, 2024 voluntary interview, which I participated in, *infra* ¶ 28, SABASSI told law enforcement that he uses a particular account on a popular online forum (the "Sabassi Online Account"). The Sabassi Online Account has since been deactivated. However, based on my review of the Sabassi Online Account before it was deactivated, I have learned, in substance and in part, that in a forum about Azerbaijan, a user asked: "America has cowboys, Japan has samurais. What does your country have." In or about February

[6] On or about April 12, 2024, OFAC designated Hudhayfa Samir 'Abdallah al-Kahlut, a/k/a "Abu Ubaida," who was the spokesman for the al-Qassam Brigades since at least 2007, pursuant to Executive Order 13224.

2024, the Sabassi Online Account commented on this post: "Hamas." I believe this comment supports Hamas because I believe, based on my training, experience, participation in this investigation, review of open-source materials, and conversations with others, SABASSI is attempting to legitimize Hamas by equating Hamas to cowboys and samurais, who are respected and revered warriors in their respective countries. In addition, in or about February 2024, I observed a discussion in a forum about Jordan and a discussion about scandals. The Sabassi Online Account replied to another user: "shooting zionists even if they r arabs yes // good…u do know arab countries r run by zionists." sed on my training, experience, participation in this investigation, conversations with other law enforcement agents and others, and my review of publicly available materials, I know Hamas often targets those it believes to be Zionists, which is a term used by Hamas and others to refer to Jews and anyone who supports the State of Israel's right to exist.

B. Hamas Materials on SABASSI's Devices

27. Based on my review of electronic devices seized from REDA MAZEN RIDA SABASSI, the defendant, pursuant to a judicially authorized search warrant, I have learned the following, in substance and in part:

a. The search history on SABASSI's devices included searches for the following, among other things:

i. Abu obeida translate speech[7]

ii. Al Qassam Brigades (and variations)

iii. Did Nazis call themselves that

iv. Our narrative Al aqsa flood

v. Sanction countries

vi. Holy Land Foundation[8]

vii. Do crypto wallets track your IP address

[7] Based on my training and experience and my participation in this investigation, I know that Abu Obeida (also spelled Obaida, Ubaida, or Ubayda) was the alias of Huthayfa Samir Abdallah al-Kahlout, a member of the al-Qassam Brigades and spokesperson for Hamas prior to his death on or about August 30, 2025, *supra* ¶ 25(g). Abu Obeida recorded a televised speech in a Hamas-released video announcing Operation Al-Aqsa Flood on October 7, 2023.

[8] In May 2009, the Holy Land Foundation and five of its leaders were convicted after a jury trial of providing material support to Hamas. *See Federal Judge Hands Downs Sentences in Holy Land Foundation Case*, Depart. of Justice Press Release, May 27, 2009, https://www.justice.gov/archives/opa/pr/federal-judge-hands-downs-sentences-holy-land-foundation-case.

viii. Hamas crypto

ix. Nova music festival in Israel[9]

x. Nova music festival ticket purchases

b. The devices seized from SABASSI also contained hundreds of photos, videos, and other media related to Hamas. Based on my training, experience, participation in this investigation, conversations with others, SABASSI's statements during his voluntary interviews in March 2024, SABASSI's messages to CC-1, and the names on some of the files, I believe at least some of these photos, videos, and other media are sourced from the al-Qassam Brigades official Telegram channel, and I recognize some of these photos, videos, and other media as being from and/or related to the October 7 Hamas Massacres and as being included in the video of the October 7 Hamas Massacres that SABASSI posted to the Sabassi Accounts. *See supra* ¶ 25(b), (d). For example, the below are photos and screenshots from some of the videos that were found on SABASSI's devices:

Screenshot showing an al-Qassam Brigades fighter affixing what appears to be an explosive to a drone.

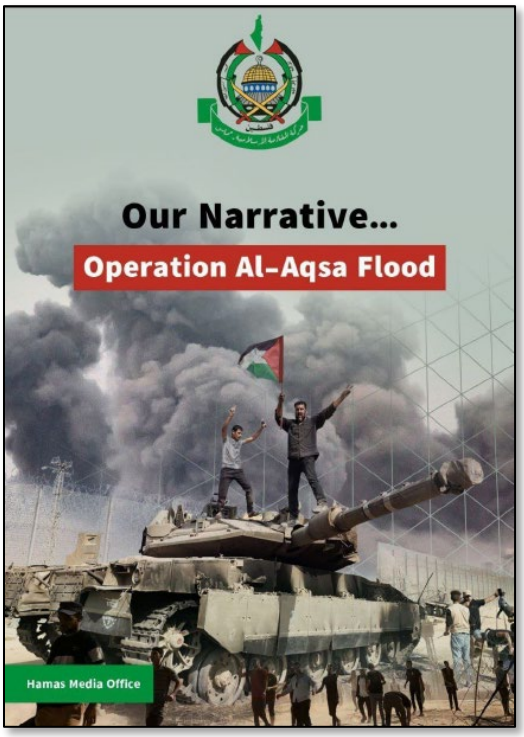
[9] Based on my training, experience, participation in this investigation, review of open-source materials, and conversations with law enforcement agents and others, I have learned that attendees of the Nova music festival in Israel were attacked during the October 7 Hamas Massacres.

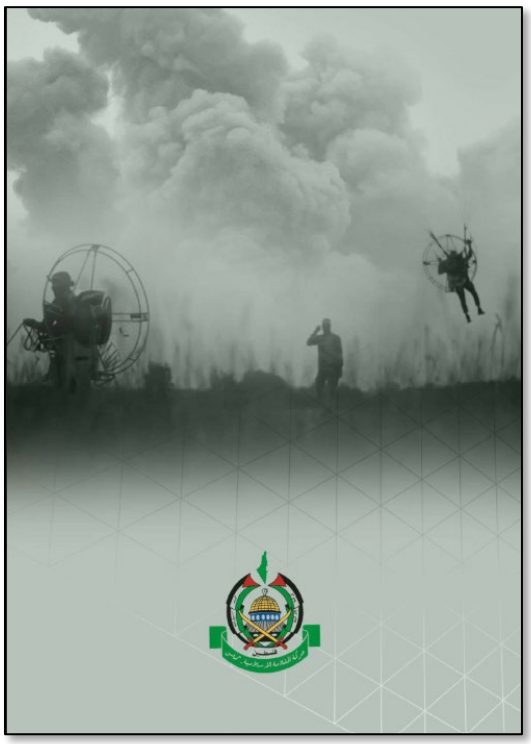
Screenshot showing members of the al-Qassam Brigades appearing to make ammunition for snipers, which was also described in the video.

Screenshot showing two al-Qassam Brigades fighters using a motorized paraglider.

c. One of the SABASSI devices contained a document titled "Our Narrative . . . Operation Al-Aqsa Flood," which appears to have been published by the Hamas Media Office. The first page of the document, shown below on the left, features the logo for Hamas and the label "Hamas Media Office" and depicts two individuals standing on a tank, and what appears to be the border between Israel and Gaza with plumes of smoke rising in the background beyond the border. Based on my participation in this investigation and my conversations with other law enforcement officers, I believe that this document was propaganda distributed by the Hamas Media Office following the October 7 Hamas Massacres in an effort to control the narrative about the attacks. The document contains sections about, among other things, (i) "Operation Al-Aqsa Flood," including Hamas's justifications for executing the terror attacks, (ii) Hamas propaganda about what happened during the attacks, (iii) a reminder to the world about who Hamas is, and (iv) a list of things that were needed in Gaza. In addition, the document contained a section with Hamas's responses to what Hamas characterized as "Israeli fabricated accusations and allegations" regarding the October 7 Hamas Massacres: for example, Hamas stated that al-Qassam Brigade fighters have a religious and moral commitment to avoid harm to civilians, especially children,

women, and elderly people, and "reiterate[d] that the Palestinian resistance was fully disciplined and committed to the Islamic values during the operation." The last page of the document, shown below on the right, appears to show Hamas fighters with motorized paragliders, which were used by Hamas fighters during the October 7 Hamas Massacres to enter Israel.





C. SABASSI's Interview with Law Enforcement Agents

28. On or about March 26 and 27, 2024, REDA MAZEN RIDA SABASSI, the defendant, participated in a voluntary interview with law enforcement.[10] Based on my participation in that interview, my conversations with other law enforcement officers, and my training and experience, I have learned the following, in substance and in part:

a. Prior to the start of the interviews, law enforcement identified themselves, advised SABASSI that the interview was voluntary and that he was free to leave at any time, and advised that it was a violation of federal law to lie to law enforcement.

b. SABASSI stated that he created an approximately one-hour long video of the al-Qassam Brigades and the events of October 7 by collecting clips from the official Telegram channel of the al-Qassam Brigades. SABASSI stated that he posted this to Sabassi

[10] Prior to the interview on March 26, 2024, law enforcement agents advised SABASSI that he was free to leave or stop questioning at any time. In addition, he was offered water and food during the interview. SABASSI met law enforcement agents in a public place for the March 27, 2024 interview. Prior to the interview, law enforcement agents advised SABASSI that the interview was voluntary and that he was free to leave at any time.

Account-2. *See supra* ¶ 25. SABASSI additionally stated that this video was graphic and showed Hamas attacking what SABASSI characterized as military targets. SABASSI claimed that he created the video to show that the Hamas fighters were not beheading or raping babies on October 7.

c. After October 7, 2023, SABASSI downloaded the al-Qassam Brigades application on his phone, which he said was a news application.

d. SABASSI advised that there were lots of things or photos related to Hamas on his devices. SABASSI claimed that these materials were not glorifying Hamas and that Hamas was fighting a bigger, more evil enemy. Later during the interview, SABASSI advised that he believed Hamas could help the citizens of Gaza. SABASSI stated that he believed that Hamas has a noble cause, which is to get their land back.

e. SABASSI claimed that he would not support Hamas with weapons or money because it is illegal.

III. CC-1 AND GAZA NOW

29. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of devices and accounts used by REDA MAZEN RIDA SABASSI, the defendant, and CC-1, and my review of publicly available materials, I have learned that CC-1 manages and operates Gaza Now,[11] a Gaza-based organization that uses its social media and other online accounts to promote Hamas's terrorist agenda and solicit funds for Hamas. For example, I have learned the following, in substance and in part:

a. Gaza Now has a Telegram channel (the "Gaza Now Channel"), which allows it to broadcast public messages to large audiences. Gaza Now has used the Gaza Now Channel to support Hamas's terrorist activities.

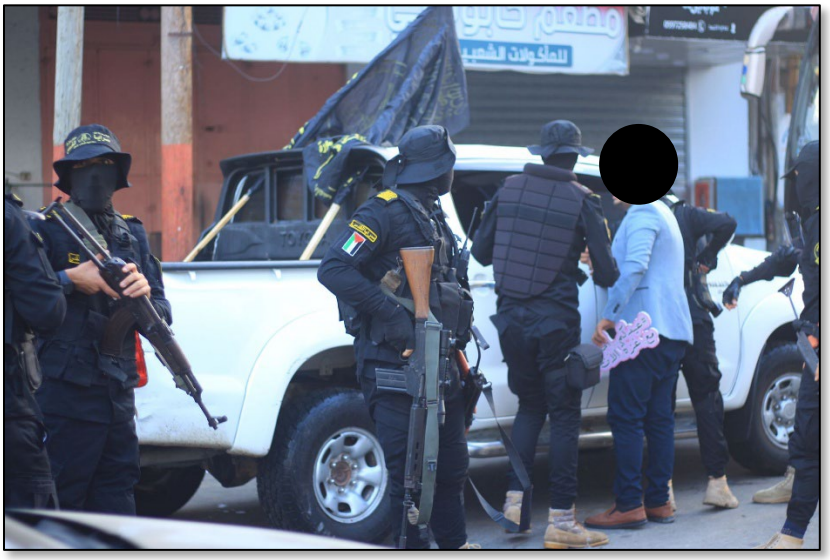
b. On at least one occasion, the Gaza Now Channel promoted a propaganda video by official Hamas leadership. Specifically, I have learned that the al-Qassam Brigades has an official channel on Telegram. On or about November 17, 2023, at approximately 2:48 p.m., the official al-Qassam Brigades channel posted a video message featuring al-Qassam Brigade spokesperson Abu Obaida (*see supra* ¶ 25(g) n.4). The Gaza Now Channel posted a summary of the contents of Abu Obaida's speech from this video at 2:46 p.m.—*i.e.*, approximately 2 minutes before it was posted to official al-Qassam Brigades channel. Other channels believed to be affiliated with or supportive of Hamas, based on the content they posted on their channels, re-published this same video at approximately 2:49 p.m. at the earliest—several minutes *after* the Gaza Now Channel posted the summary of the speech.

[11] On March 27, 2024, OFAC designated CC-1 and Gaza Now as SDGTs pursuant to Executive Order 13224 for being key financial facilitators involved in fundraising for Hamas.

30. I have reviewed materials from two email accounts used by CC-1 ("Email Account-1" and "Email Account-2") pursuant to a judicially authorized search warrant. Based on my review of those accounts, I have learned the following, in substance and in part:

a. Email Account-1 contained a contract dated March 2, 2022, between Gaza Now, another co-conspirator not named as a defendant herein ("CC-2"), and Al-Qureshi Executives (an entity in the United Kingdom).[12] Based on my review of public records, I have learned that CC-2 was the director of the Al-Qureshi Executives, which was dissolved in or about March 2025, approximately a year after the Al-Qureshi Executives was designated as an SDGT by OFAC. The contract assigned all copyrights to the creative content generated for what the contract described as a "charity event on the Eid festivals" where individuals would dress as military soldiers and distribute sweets to children in Gaza.

b. Email Account-1 had hundreds of photographs and approximately three videos that were dated on or about July 9, 2022. This media appears to relate to one of the "charity events" described in the contract between Gaza Now, CC-2, and the Al-Qureshi Executives.[13] One of those photos is included below, and shows an individual ("Individual-1") carrying a sign, which I believe to contain the Gaza Now logo based on my review of other photos from that day, alongside individuals dressed in black, wearing masks with Arabic writing in gold, and carrying firearms, including assault rifles:



c. Email Account-2 contained more than two hundred photos and one video dated on or about May 2, 2022. This media appears to relate to one of the "charity events"

[12] On March 27, 2024, the same day OFAC designated CC-1 and Gaza Now, OFAC also designated CC-2 and the Al-Qureshi Executives as SDGTs pursuant to Executive Order 13224 for being key financial facilitators involved in fundraising for Hamas.

[13] In 2022, the Islamic holiday Eid al-Adha occurred on or about July 10, 2022.

described in the contract between Gaza Now, CC-2, and the Al-Qureshi Executives.[14] The photos and video show men dressed similarly to the men pictured in the above-photo from Email Account-1: black clothing, masks with Arabic writing in gold, and carrying firearms, including assault rifles. One of those photos is included below, which shows Individual-1 holding a sign with Gaza Now's logo surrounded by men wearing this military garb:

As described below, this military garb in the photos above from Email Account-1 and Email Account-2 is consistent with that worn by the al-Quds Brigade, the armed wing of the foreign terrorist organization Palestinian Islamic Jihad ("PIJ").[15] In the video and photographs, the men are handing out candy and other items to children in what is presumed to be Gaza. During the video and in the photographs, some of those featured have signs with the name of Gaza Now—such as the sign held by Individual-1 in the photo shown above. Additionally, the candy was distributed in containers featuring the logos of Gaza Now and the Al-Qureshi Executives, as well as a cartoon soldier.

[14] In 2022, the Islamic holiday Eid al-Fitr occurred between on or about May 1, 2022 and on or about May 2, 2022.

[15] The Secretary of State designated PIJ an FTO on October 7, 1997. The Department of State designated PIJ as an SDGT pursuant to Executive Order 13224 on October 31, 2001. Based on my training, experience, participation in this investigation, review of open-source materials, and conversations with other law enforcement agents, I have learned that Hamas and PIJ have collaborated closely with one another in Gaza and worked together to perpetrate terrorist attacks, including the October 7 Hamas Massacres.

d. Email Account-2 also contained a photograph, which is pictured below:

Based on my training, experience, and participation in this investigation, I believe that in the above photograph, a child is holding a sign with what appears to be the logo for Gaza Now and the text: "Your holiday is better with Gaza Now." I believe the men dressed in black as supposed "soldiers" per the contract (referenced above) appear to be in fact members of the designated foreign terrorist organization PIJ: based on my training and participation in this investigation, I have learned that this is the common military garb worn by members of PIJ's al-Quds Brigade, whose members frequently wear all black with masks with this specific Arabic message. Additionally, the soldiers in the photo above are wearing headbands that read: "There is no God but Allah and Mohammed is his Messenger / Al-Quds Brigade / God is Great" in gold. In addition, one of the children appears to be holding a firearm (circled in yellow) and certain children are wearing t-shirts which appear to depict firearms, also indicating an association with violence. Accordingly, I believe the above-referenced video and the above photograph are propaganda material for PIJ and that the event was intended to raise funds from individuals seeking to support PIJ and its al-Quds Brigade. The display of the Gaza Now logo and the slogan referencing Gaza Now indicates the close relationship between Gaza Now and PIJ.

31. Gaza Now has used, and is currently using, various social media accounts to solicit funds, including in posts bearing Hamas propaganda, using cryptocurrency wallet identifiers to solicit cryptocurrency as well as fiat funds (government-issued currency) via links to its accounts on various remittance platforms. For example, based on my review of a Telegram channel used by Gaza Now, I have learned that on or about January 18, 2023, Gaza Now posted the following message, which was translated by Telegram to English: "170 left . . . The brothers

who requested this data." That post is followed by a post with a cryptocurrency address and followed by another post of a photograph showing a man holding a firearm in front of a green background with a green headband. Based on my training and experience, participation in this investigation, and conversation with other law enforcement officers, I have learned that Hamas uses this shade of green as its official color, and the headband depicted in the photo is consistent with, or is intended to represent, headbands worn by members of the al-Qassam Brigades. Further, based on the content of these posts and my training, experience, and participation in this investigation, I believe these posts are designed to solicit funds in support of members of Hamas.

32. Based on my review of materials from cellphones seized from CC-1 in or about March 2024, I have learned, among other things, that the devices contained at least two emails from Email Account-2 to an email address that references "media" and contains the domain "@hamas.ps" (the "Hamas Media Email Address"). Based on my training, experience, participation in this investigation, and conversations with other law enforcement agents, I understand that the Hamas Media Email Address, which has a Hamas domain in Palestine[16], is used by Hamas. I have learned the following about these emails, in substance and in part:

a. On or about August 12, 2017, Email Account-2 sent the Hamas Media Email Address an email with the subject line: "Very Crucial, Special Request to Urgently Follow Up." In the body of the email, CC-1 identified himself and explained that foreign law enforcement authorities were investigating him and Gaza Now "on charges of being affiliated with Hamas." CC-1 stated that he "denied having any relation with anyone in Hamas or my relationship to Hamas." CC-1 then asked that Hamas "deny any relationship, as soon as possible, whether with me [CC-1] or [Gaza Now] with you." CC-1 then reiterated his request for Hamas to publish a denial.

b. On or about March 8, 2020, CC-1 sent an email from Email Account-2 to the Hamas Media Email Address with a subject line about Gaza Now and the Hamas movement. The body of the email contained a similar message and attached a file named, "Hamas movement.pdf." The attachment was a one-page memorandum on Gaza Now's letterhead with the subject line, "Apology," and addressed to "Excellencies in Hamas Movement." The memorandum extended its "best wishes" and wished "continuous success, sound judgment and abundant health." The memorandum then apologized "for offending you [Hamas] at a moment of anger through our Facebook page due to 'the Youth Media Center' affiliated with 'Hamas' failing to include [Gaza Now] as one of the ranking news sites that have a wide-reaching impact and recognition around the world." The memorandum noted that Gaza Now has over 2.5 million followers. The memorandum further explained that Gaza Now was frustrated by the Ministry of Interior, the Government Media Office, and the Ministry of Health—all of which I believe are controlled by Hamas in Gaza based on my training, experience, participation in this investigation, review of open source materials, and conversations with other law enforcement agents—ignoring Gaza Now's requests for information to verify a news report. The memorandum concluded by stating that Gaza Now is open to communication "[s]hould any errors occur" and that they "value and

[16] The domain of the Hamas Media Email Address (@hamas.ps) includes Hamas and ".ps" which I know, based on my review of open-source materials and conversations with other law enforcement agents, is the Internet country code assigned to Palestine.

take pride in you [Hamas], and we [Gaza Now]; we pray that God accepts your good deeds and righteous efforts."

33. CC-1 has a brother, a co-conspirator not named as a defendant herein ("CC-3"), who lives in Turkey. Based on my review of devices used by CC-1, I have learned that on or about December 19, 2023, CC-3 sent an audio message to CC-1. The audio message was directed to "Abu Al-Abed." Based on my participation in this investigation, my review of open-source materials, and my conversations with other law enforcement agents and others, I understand that Haniyeh[17], the former chairman of Hamas's Politburo from 2017 until his reported death on or about July 31, 2024, was also commonly known as Abu Al-Abed. In the message, in substance and in part, CC-3 stated that he is "an employee at the Legislative Council, with the Hamas Movement's Reform Bloc."[18] CC-3 explained that Abu Al-Abed knew that CC-3 was wounded when he arrived in Turkey two days ago and that he has not received his salary since the events in Gaza. CC-3 ended the message by explaining that he needed help from Abu Al-Abed—*i.e.* Haniyeh—and that he would like to meet him, if he is available. CC-1 then forwarded the audio message to another contact. Accordingly, in the above message, I believe that CC-3 is asking CC-1 for help in contacting Haniyeh (a Hamas leader) because CC-3 is a Hamas member who has not been paid.

34. Based on my review of publicly available materials, my participation in this investigation, and my conversations with other law enforcement agents and others, I have learned that on or about December 4, 2023, Haniyeh offered his condolences on the martyrdom of CC-1's family in a public statement following an Israeli strike that injured members of CC-1 and CC-3's family, which CC-3 referenced in his audio message to CC-1. *See infra* ¶ 43(a).

IV. SABASSI'S RELATIONSHIP WITH CC-1 AND GAZA NOW

35. REDA MAZEN RIDA SABASSI, the defendant, has maintained a relationship, including via multiple messaging applications, phone calls, and financial transactions, with CC-1 and Gaza Now since at least in or about October 2017. Based on my review of materials from devices seized from SABASSI pursuant to a judicially authorized search warrant, I have learned the following, in substance and in part:

a. Since in or about October 2017, SABASSI has been in contact with a phone number with a country code for the Palestinian territories and ending in 9777 (the "9777 Number"). CC-1 uses the 9777 Number.[19]

[17] On January 31, 2018, the Department of State designated Haniyeh as an SDGT pursuant to Executive Order 13224.

[18] Based on my training, experience, participation in this investigation, review of open-source materials, and conversations with law enforcement agents and others, I believe that, in the audio message above, CC-3's use of the "Hamas Movement's Reform Bloc" is a reference to the political wing of Hamas, which is called the Change and Reform Bloc.

[19] Among other things, (i) the 9777 Number is listed as the "Recovery SMS" number on Email Account-2 and (ii) CC-1 listed the 9777 Number as his phone number in a European Union passport application form for himself that was saved to Email Account-2.

b. SABASSI and CC-1 have often discussed how to transfer money to Gaza without being detected by authorities or having their accounts frozen. Additionally, they discussed various methods and applications for sending money that make it more difficult for law enforcement to trace or identify the involved parties. For example:

i. On or about October 17, 2023, CC-1 asked SABASSI not to use the name of Gaza Now and to use a different name instead. SABASSI explained that he could not choose the name and suggested using a specific application or a particular decentralized blockchain that does not require personal identification. Based on my review of open-source materials, I have learned that the application SABASSI suggested obscures information that is normally publicly available on a blockchain. CC-1 agreed so long as there was no adverse effect. SABASSI further told CC-1 that, if they use the decentralized blockchain, the sender should know to hide their wallet because if the sender transferred funds from their own wallet they might get caught. SABASSI also told CC-1 that it would be better for CC-1 to write an advertisement that said that CC-1 was raising funds to help bombing victims and that CC-1 had done so for a long time. Based on my training, experience, and participation in this investigation, I believe that, in these messages, SABASSI and CC-1 are discussing ways in which they can transfer and receive money to avoid law enforcement scrutiny and accounts being closed. In addition, I believe that SABASSI asked CC-1 to write an advertisement about the funds being raised for bombing victims for a long period of time to further avoid law enforcement scrutiny and to make the fundraiser appear legitimate and not related to Hamas.

ii. On or about October 18, 2023, CC-1 messaged SABASSI that "we were shocked that our account is frozen." CC-1 added that they "posted the new address of the wallet and a bank account of the sister in Britain who is the manager of an institution." CC-1 also messaged SABASSI that he is still waiting to see if the "brothers" received the money safely. Based on my training and experience, participation in this investigation, conversations with other law enforcement officers, and open-source materials, I have learned that members of Hamas commonly refer to each other as "the brothers." In addition, SABASSI told CC-1 that "[i]f the Zionists learned about it [cryptocurrency addresses] from Telegram they will submit a request to Tether and it will be frozen within hours."

iii. On or about October 20, 2023, SABASSI messaged CC-1 to warn others about Tether. CC-1 also messaged SABASSI that a bank in Britain blocked someone but that "the sister said that she has a good relation with the bank manager" so the account was receiving money and she could withdraw it. CC-1 further explained that "she [the sister] understands the British laws" and that she informed them to "[n]ever write that it is for Hamas and cause us trouble. Lol. She is smart and knows how to deal with the issue." Based on my training, experience, participation in this investigation, and my review of conversations between CC-1 and CC-2, I believe that the "sister" in Britian in the above messages refers to CC-2 who, as described in more detail above, lived in the United Kingdom and worked with Gaza Now with respect to, among other things, creating PIJ propaganda, *see supra* ¶ 30. I further believe that CC-2 advised CC-1 (who then communicated CC-2's advice to SABASSI) to not include Hamas in transaction descriptions to avoid transactions being denied or blocked or accounts being closed and to avoid further scrutiny from authorities because the funds were, in fact, destined for Hamas (as referenced

in the October 18, 2023 message from CC-1 to SABASSI that he was waiting for "the brothers"—*i.e.*, Hamas—to tell him where to send the money).

iv. On or about October 28, 2023, CC-1 asked SABASSI to send him new cryptocurrency wallet addresses. CC-1 explained: "When I did the translation, the word terrorism appeared." CC-1 then told SABASSI to "[t]ransfer the money to another wallet that you create yourself, and from the unannounced wallet we transfer to them." CC-1 further explained that he "thought it would be less dangerous if we transfer to an unannounced wallet first then we can transfer to any other party, or to the brothers." Based on my training, experience, and participation in this investigation, I believe that, in these messages, CC-1 asked SABASSI to create new cryptocurrency wallets that were unaffiliated with him so the wallet would not be associated with terrorism. Further, I believe that CC-1 was trying to avoid law enforcement scrutiny by attempting using an "unannounced wallet"—*i.e.*, a wallet that they did not publicize on social media—to transact with others or "the brothers"—which, as stated above, I know based on my training and experience to be a reference to members of Hamas.

v. On or about January 26, 2024, SABASSI advised CC-1 that they could try using a certain virtual currency mixer, which, at the time, was sanctioned by OFAC. SABASSI and CC-1 discussed the fact that the mixer was banned in the United States, and then CC-1 told SABASSI to use a virtual proxy network ("VPN") to make it appear as if he was located outside of the United States. SABASSI responded that it (an apparent reference to the mixer) does not work with a VPN. Based on my training, experience, and participation in this investigation, I understand that virtual currency mixers are often used to obfuscate the true origin, control, or destination of funds.

c. SABASSI also asked CC-1 questions about videos of the October 7 Hamas Massacres and the timing of the massacres. Specifically, on or about November 5, 2023, SABASSI asked CC-1 where he could find video archives for the October 7 Hamas Massacres belonging to Hamas. CC-1 directed SABASSI to the al-Qassam Brigades Telegram channel. A few days later, on or about November 8, 2023, SABASSI asked CC-1 why it was reported that the "operation"—*i.e.*, the October 7 Hamas Massacres—started on October 7 but the first pictures and videos were dated October 6. CC-1 explained that the attack started before October 7 but that the strongest hit of the attack was on October 7. As set forth above, SABASSI later posted a video compilation of the October 7 Massacres to Sabassi Accounts. *See supra* ¶ 25(b), (d).

36. Based on my review of devices seized from REDA MAZEN RIDA SABASSI, the defendant, pursuant to a judicially authorized search warrant, I have learned that SABASSI logged into CC-1's personal account for a remittance platform, which CC-1 used to collect money. SABASSI used a password that appeared to include a reference to CC-1's first name and an email account used by CC-1 and Gaza Now.

37. In addition, I know that REDA MAZEN RIDA SABASSI, the defendant, has used the Sabassi Accounts to interact with Gaza Now's accounts by, for example, following accounts used by Gaza Now and re-posting certain posts by Gaza Now.

38. Based on my review of WhatsApp pen register data for a phone number used by REDA MAZEN RIDA SABASSI, the defendant, I have learned, among other things, that

SABASSI communicated with the 9777 Number (used by CC-1) as recently as in or about August 2025 and SABASSI communicated with a phone number ending in 2305 (the "2305 Number") used by CC-3 as recently as in or about March 2025.[20]

V. SABASSI'S FUNDRAISING FOR HAMAS WITH CC-1 AND GAZA NOW

A. Ikram – The Arab Charity Foundation Inc.

39. Based on my review of filings with the State of California, I have learned that Ikram has been a registered 501(c)(3) charity out of San Diego, California since at least in or about October 2022. REDA MAZEN RIDA SABASSI, the defendant, is listed as Ikram's Chief Executive Officer, Chief Financial Officer, and Secretary.

40. On or about May 10, 2025, Ikram filed a Form 990 with the Internal Revenue Services ("IRS"). I have reviewed that Form 990 and learned the following, in substance and in part:

a. On April 29, 2025, REDA MAZEN RIDA SABASSI, the defendant, as the Executive Director of Ikram, signed the Form 990 "[u]nder penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete."

b. Ikram described its mission in 2024 as providing emergency humanitarian relief to displaced families and refugees. Ikram's mission included providing direct aid such as food, medical assistance, and shelter.

c. Ikram reported receiving $638,627 in contributions and grants and reported that it "SUCCESSFULLY DISTRIBUTED APPROXIMATELY $140,000 TO VETTED BENEFICIARIES AND PARTNER AID CHANNELS IN GAZA." Ikram further explained that the remaining funds were placed under federal seizure due to an ongoing FBI investigation unrelated to Ikram's charitable activities.

d. Ikram reported that SABASSI worked an average of 5 hours per week at Ikram, and he did not receive any reportable compensation from the organization.

41. REDA MAZEN RIDA SABASSI, the defendant, and Ikram have a close relationship with CC-1 and Gaza Now. Ikram has previously posted fundraisers to social media accounts with and on behalf of Gaza Now, and Gaza Now has done the same for Ikram. For example, based on my review of public posts to Gaza Now accounts, including archived posts, and other open-source materials, I have learned the following in substance and in part:

a. On or about June 19, 2022, an account used by Gaza Now and controlled by CC-1 solicited funds for a family in Gaza. The post indicated that funds should be sent to SABASSI's account on a remittance platform connected to his email address.

[20] Among other things, I believe that CC-3 uses the 2305 Number because the 2305 Number is saved in at least one of CC-1's devices under CC-3's name and description as CC-1's brother.

b. In or about March 2023, Gaza Now re-posted a post from another account promoting the sale of a collection of non-fungible token ("NFT") , which was sponsored by Ikram, where a portion of the proceeds would be donated to Palestinians.

c. Between in or about March 2023 and on or about October 9, 2023, Ikram used a crowdfunding platform to collect funds. Its fundraising webpage on that crowdfunding platform explicitly stated that the campaign was for Ikram and Gaza Now. That fundraiser was also advertised by Gaza Now on its Telegram channel and indicated the funds should go to Ikram's account on a specific remittance platform.

42. In addition, REDA MAZEN RIDA SABASSI, the defendant, fundraised on behalf of and in conjunction with Gaza Now. For example, based on my review of an archived version of Ikram's website from on or about October 10, 2023, I know that Ikram's website purported to work alongside Gaza Now to raise more than $55,000 purportedly for people in Gaza to provide shelter, food baskets, medical supplies, as well as other basic necessities to people in need.

B. SABASSI's Fundraising with Gaza Now for Hamas

43. Based on my review of records from fundraising websites, my review of messages exchanged between REDA MAZEN RIDA SABASSI, the defendant, and CC-1, my review of posts to the Sabassi Accounts, and other publicly available materials, I have learned the following, in substance and in part, about fundraisers that SABASSI organized in conjunction with CC-1:

a. On or about December 23, 2023, SABASSI created a fundraiser on a fundraising platform titled: "Help 4 orphans who were rescued from Gaza start a new life" ("Fundraiser-1"). Fundraiser-1 sought to raise $100,000 purportedly for the last surviving members of a family who lost their parents and home in Israeli airstrikes. I believe that Fundraiser-1 was actually for the benefit of family members of CC-1, who reportedly were affected by airstrikes on November 22, 2023. *See supra*, ¶ 34. Among other things, SABASSI messaged CC-1 on or about November 22, 2023, the day of the airstrikes: "May the [CC-1] family rest in peace and may God avenge their killings." Moreover, on or about December 23, 2023—the day Fundraiser-1 was created—CC-1 and SABASSI exchanged messages about the specifics of Fundraiser-1, such as its title and description. CC-1 then messaged SABASSI the names of the four children who purportedly lost their families in Gaza, and their last names were all variations of CC-1's last name. Gaza Now posted a link on its social media account for Fundraiser-1 on or about January 19, 2024. As set forth in more detail above, Haniyeh (a Hamas leader) offered his condolences on the martyrdom of CC-1's family following the Israeli airstrikes. *See supra* ¶ 34. In addition, based on my training, experience, participation in this investigation, review of open-source materials, and conversations with law enforcement officers and others, I have learned that Hamas pays family members of Hamas operatives who are killed—*i.e.*, martyrs. *See supra* ¶ 13(g).

b. On or about January 20, 2024, SABASSI created a fundraiser titled "Gaza Relief" with a donation goal of $1 million ("Fundraiser-2"). The subtitle for the campaign stated that it aimed to provide vital necessities, food, tents, and clothes for those in need. On or

about February 10, 2024, SABASSI sent the link for Fundraiser-2 to CC-1. CC-1 then directed SABASSI to use a certain image and title for the fundraiser.

c. On or about February 1, 2024, CC-1 messaged SABASSI that CC-1 wanted a new fundraising campaign. CC-1 inquired about the campaign being in the name of Gaza Now with photographs and videos so that people know it is an official campaign. SABASSI messages CC-1 that the campaign would be in "a name other than Gaza Now." CC-1 then asked: "But it would be Gaza Now itself?" SABASSI answered in the affirmative, and then SABASSI replied that the name should be "Izz Al-Din Al-Qassam, for 😂 example"—using the name of the al-Qassam Brigades. In response, CC-1 laughed and said: "Lol. Oh dear. Into prison."—an apparent reference to the fact that they would be imprisoned by law enforcement if they used "Izz Al-Din Al-Qassam" in their campaign name and/or if they in fact raised funds for Hamas. They then agreed to use "Ikram." From this conversation, I understand that SABASSI and CC-1 were discussing fundraising campaigns and techniques to make the fundraiser appear legitimate and obscure from outside observers that Hamas was the true beneficiary, but also signaling to Hamas supporters that it was an official campaign, *i.e.*, directly related to Hamas, by doing it under Gaza Now's name.

d. On or about February 2, 2024, SABASSI created another fundraiser titled "Gaza Relief Urgent Appeal" with a donation goal of $1 million ("Fundraiser-3"). The subtitle for Fundraiser-3 stated that it aimed to provide vital necessities, like medicine, food, tents, and clothes, and purportedly to "ensur[e] a brighter and warmer future for those who were displaced during the aggression on Gaza." That same day, SABASSI sent the link for Fundraiser-3 to CC-1 and reported: "So far US$12,959 out of $54,806 for the displaced." Gaza Now posted a link to its social media account for Fundraiser-3 on or about February 2, 2024,

e. On or about February 21, 2024, SABASSI created another fundraiser title "Gaza Relief Funds" with a donation goal of $500,000 ("Fundraiser-4") (together with Fundraiser-1, Fundraiser-2, and Fundraiser-3, the "Fundraisers"). The subtitle for Fundraiser-4, which was the same as Fundraiser-2, stated that it aimed to provide necessities, food, tents, and clothes for those in need.

f. SABASSI deactivated the Fundraisers in or about March 2024.

44. Based on my review of records for the Fundraisers, I have learned that the Fundraisers collectively raised approximately $604,000 in donations from thousands of donors. Among those donors, more than 100 donors (who donated more than $19,000 in total to the Fundraisers) appear to reside in the Southern District of New York based on the city, state, and zip codes associated with the donors' accounts on the fundraising platform used by the Fundraisers.

45. On or about February 16, 2024, SABASSI, using Sabassi Account-1, replied to a post advertising one of the Fundraisers: "(For those who are wondering how we will get the goods through the borders) we have a connection that would facilitate the passing for the truck(s) we send." During the March 26, 2024 voluntary interview of REDA MAZEN RIDA SABASSI, the defendant, which I participated in, SABASSI told law enforcement that he asked CC-1 how to respond when someone asked about the aid trucks on social media, and SABASSI did not know how the trucks would get to Gaza.

C. The Funds Raised by SABASSI and Ikram

46. As described above, REDA MAZEN RIDA SABASSI, the defendant, raised at least approximately $604,000 through the Fundraisers. As set forth in more detail below, of those funds, SABASSI (i) sent approximately $116,000 to CC-3, who as stated above, is a member of Hamas, *see supra* ¶ 33; (ii) attempted to convert about $380,000 to cryptocurrency for the purpose of sending at least a portion of those funds to a wallet provided by CC-1, but which were retained or not returned by SABASSI's cryptocurrency exchangers; (iii) sent approximately $10,000 to a company at the direction of CC-1 to be transferred to Turkey; and (iv) used some of the remaining funds for his own personal expenses. Specifically, based on my participation in the March 2024 voluntary interviews of SABASSI, my review of devices seized from SABASSI pursuant to a judicially authorized warrant, my review of financial records and records for the Fundraisers, my review of open-source materials, my conversations with other law enforcement officers, and my training and experience, I have learned the following in substance and in part, about the funds:

a. On or about January 29, 2024, SABASSI, at the direction of CC-1, wrote a check for $10,000 to a U.S.-based entity owned by another co-conspirator ("CC-4") who would arrange for those funds to be sent to Turkey.

b. SABASSI attempted to convert approximately $382,000 of the funds raised through the Fundraisers into cryptocurrency as follows:

i. On or about January 29, 2024, CC-1 sent SABASSI a cryptocurrency address beginning in TAbZ (the "TAbZ Address") to receive cryptocurrency.

ii. In or about early February 2024, SABASSI attempted to use the services of another individual ("Individual-2") to convert funds he received to his Fundraisers to USDT.[21] In or about February 2024, SABASSI communicated with an associate of Individual-2 ("Individual-3") regarding the conversion of U.S. dollars to USDT. During these communications, among other things, SABASSI sent the TAbZ Address to Individual-2 and Individual-3 and explained that SABASSI wanted approximately 65,000 USDT to be sent to the TAbZ Address.

iii. On or about February 7, 2024, SABASSI, at the direction of Individual-2, wrote a $95,000 check to a New York City resident ("Individual-4"), and then deposited that check in Individual-4's bank account. SABASSI also sent a photo of the deposit receipt to Individual-2, which indicated that the deposited funds would be available on February 16, 2024.

iv. On or about February 10, 2024, SABASSI sent CC-1 an accounting for the "first 100,000 that [he] will send." Specifically, SABASSI stated there would be 47,177.96 for the "Al Jama'ah campaign," 11,390 for the Ikram campaign, 13,500 for the

[21] Tether ("USDT") is a stablecoin, or a fiat-collateralized token, that is backed by fiat currencies in order to stabilize their value by tying it to the value of fiat currency. Tether is tied to the value of the U.S. dollar.

displaced orphan campaign, and 27,932 for the orphan children campaign. Based on my conversations with other law enforcement officers and FBI linguists, I understand that that "Al Jama'ah" translates to "the group," and based on my participation in this investigation, my training, experience, and conversations with other law enforcement officers, SABASSI and CC-1's discussions about fundraising for Hamas, *supra* ¶¶ 35(b), 43; CC-2's instructions never to include "Hamas" in transaction descriptions, *supra* ¶ 35(b)(iii); CC-1's fundraising for PIJ with the Al-Qureshi Executives, *supra* ¶ 35(b); and SABASSI's other support for Hamas, *supra* ¶¶ 25-27; among other things, I understand "Al Jama'ah" to refer to Hamas. In addition, based on the descriptions of the Fundraisers and messages exchanged between SABASSI and CC-1, I believe that the "Ikram campaign" refers to Fundraiser-3, the "orphan campaign" refers to Fundraiser-1, and the "displaced orphan campaign" refers to Fundraiser-2.[22]

v. Accordingly, I believe that, in the above message, SABASSI told CC-1 that, at that time, at least approximately $47,000 of the funds raised were directly for Hamas (the Al Jama'ah campaign funds). SABASSI then messaged CC-1 that he would send the money on the 16th or 17th of the month, and that the check would be gone on the 16th. Given the timing of this conversation, the reference to a check, the reference to the funds being gone on the 16th (*i.e.*, the same day the funds from the $95,000 check were available after being deposited), and SABASSI sending the TAbZ Address to Individual-2 and Individual-3 (which CC-1 previously sent to SABASSI), I believe that SABASSI intended to convert the money he received from the Fundraisers into USDT to send to CC-1 with approximately $47,000 earmarked specifically for Hamas.

vi. Between on or about February 13 and February 23, 2024, SABASSI, at the direction of Individual-2, transferred approximately $287,000 over the course of seven wires to a particular company ("Company-1").

vii. On or about February 14, 2024, SABASSI messaged CC-1: "The upcoming disbursement amounts to approximately 294,000, allocated as follows: Al-Jama'ah Campaign – 189,601.47 // Ikram Campaign – 25,406.25 // Children's Campaign – 45,716.65 // Children's Campaign for Displaced Persons – 18,456." I understand this message to mean that SABASSI was advising CC-1 that he expected to send approximately $190,000—the majority of the fundraising raised to date—specifically for Hamas, in addition to allocating the remaining portion to the other purported charitable campaigns, as described in more detail above.

viii. Accordingly, in SABASSI's February 10 and 14, 2024 messages, SABASSI messaged CC-1 his allocation for approximately $394,000 that had been raised through the Fundraisers. Based on my training, experience, participation in this investigation, review of open-source materials, and conversations with other law enforcement agents, I believe that SABASSI intended to divert a majority of the funds raised through the Fundraisers to Hamas because (i) SABASSI stated that a total of approximately $236,601 was earmarked for Hamas ("Al-Jama'ah"), *see supra* ¶ 46(b)(iv), (vii); (ii) SABASSI originally messaged CC-1 that Fundraiser-3 should be called "Izz Al-Din Al-Qassam"—Hamas's military

[22] Fundraiser-4 was not created until February 20, 2024, after this message was sent.

wing, *see supra* ¶ 43(c); and (iii) Fundraiser-1 purported to raise money for CC-1's family members, who Haniyeh described as martyrs, *see supra* ¶ 34.

ix. On or about February 15, 2024, CC-1 sent a voice message to SABASSI asking him to do his best to send the money on the same day because a delay causes problems for other people. CC-1 further explained that delays cause him embarrassment with the people he deals with who are nice to him, but they will not trust him with further delay. On or about February 18, 2024, CC-1 sent a voice message to SABASSI to let SABASSI know that CC-1 appreciates SABASSI but that he has been waiting two weeks, which is too long.

x. On or about February 20, 2024, SABASSI sent a voice message to CC-1 to provide an update regarding the funds that were being transferred with the assistance of Individual-2 and Individual-3. SABASSI explained that the transfer was delayed because Individual-3 was late and then Individual-2's bank was closed. SABASSI further explained that he "blamed" Individual-3 because he was late and blamed him for "embarrassing" SABASSI in front of "the group"—which, for the reasons I explained above, I believe to be a reference to Hamas.

xi. On or about March 20, 2024, SABASSI sent a voice message to CC-1 asking for invoices for aid trucks and referring to Individual-2 and Individual-3's failure to transfer the funds. SABASSI explained that he went to the police station and was advised to report his case to the FBI. SABASSI further explained that he wanted to submit all paperwork together so that the FBI does not come back to him with questions. I understand that SABASSI was asking CC-1 for invoices that would (i) substantiate his fundraisers in support of his claim that Individual-2 and Individual-3 stole funds and (ii) not disclose that the funds were intended for Hamas.

xii. On or about March 21, 2024, SABASSI submitted a complaint to the FBI's Internet Crime Complaint Center to report a $385,000 loss on behalf of Ikram because SABASSI reported that he never received any USDT from Individual-2, Individual-3, Individual-4, or Company-1.

c. In or about January and February 2024, SABASSI and CC-1 discussed having SABASSI send funds to CC-3. For example, on or about January 24, 2024, CC-1 messaged SABASSI that CC-3 had a bank account and asked if it would be reasonable to send directly to CC-3's account. As another example, on or about February 1, 2024, CC-1 messaged SABASSI that it was important to transfer funds to CC-3 because CC-1 already told CC-3—an apparent reference to CC-1 telling CC-3 about the funds being transferred. CC-1 and SABASSI also discussed using cryptocurrency to transfer money raised through the Fundraisers which, as discussed above, CC-1 and SABASSI tried to do. *See supra* ¶ 46(b).

d. In or about February and March 2024, SABASSI sent money raised through the Fundraisers to CC-3, a member of Hamas, *see supra* ¶ 33. SABASSI maintained a business bank account held in the name of Ikram at a U.S. bank ("Bank-1") ending in 5258 (the "5258 Ikram Account"), for which SABASSI is the authorized signer. Between on or about February 26 and March 12, 2024, SABASSI transferred a total of approximately $116,000 from the Fundraisers to the 5258 Ikram Account via the payment processor for the Fundraisers (the

"Payment Processor"). The 5258 Ikram Account did not receive any other deposits during that time. Between on or about February 28 and March 13, 2024, SABASSI, using the 5258 Ikram Account, sent approximately $116,000 in total to CC-3 in Turkey. As set forth in more detail above, I believe that CC-3 is a Hamas member because of, among other things, the audio message that he sent to CC-1 about being an employee of "the Hamas Movement's [Change and] Reform Bloc" and wanted to get in contact with Haniyeh to be paid.

e. On or about February 29, 2024, the Payment Processor informed SABASSI that it was reviewing Ikram's account and asked SABASSI for additional information, including an explanation of how the funds were being transferred to the ultimate beneficiaries and a list of partners or recipients of the funds. SABASSI responded that the funds would be wired to recipients in Turkey who would then transfer the money to Egypt. The team in Egypt would then work with a team in Gaza to facilitate the sending of aid trucks. Among other individuals, SABASSI identified CC-3 as one of the recipients in Turkey.[23]

f. Thus, in total, SABASSI raised at least approximately $511,000 for CC-1 and Gaza Now to transfer to Hamas, though he was only able to transfer approximately $126,000 to Gaza Now through CC-3 and CC-4 because Individual-2, Individual-3, and Individual-4 retained and/or did not return approximately $382,000 raised by SABASSI and did not provide him the equivalent amount of USDT for transfer to Gaza Now.

g. As set forth in more detail below, *see infra* ¶ 52, SABASSI also used some of the funds he raised through the Fundraisers for personal expenses. For example, SABASSI told law enforcement during his voluntary interviews in March 2024 that he sent approximately $5,000 to a personal cryptocurrency account (the "Sabassi Crypto Account") and approximately $6,000 to his personal bank account, which he used to pay off his personal credit card in or about February 2024.

VI. SABASSI'S OTHER TRANSACTIONS WITH CC-1, CC-2, CC-3, AND GAZA NOW

47. As set forth in more detail below, I have learned that REDA MAZEN RIDA SABASSI, the defendant, has had direct financial transactions with CC-1 and Gaza Now since at least in or about October 2018.

48. Based on my review of financial records for an account used by CC-2, I have learned that between on or about April 27, 2022 and on or about September 20, 2023, CC-2

[23] SABASSI also identified several members of the team in Gaza, including Indivudal-1, who was captured in photographs and videos delivering candy to children and posing with PIJ soldiers in 2022, which was described as a "charity event" in a contract between Gaza Now, CC-2, and the Al-Qureshi Executives. *See supra* ¶ 30(c). SABASSI additionally identified another individual ("CC-5") as a recipient in Turkey along with CC-3. Based on my review of social media posts by CC-5 and messages between CC-1 and CC-5 found on devices seized from CC-1, I have learned, among other things, that CC-5 has posted several photos appearing to glorify Hamas fighters. In addition, CC-1 and CC-5 have discussed funds being sent to CC-5, and CC-5 provided the TABz Address to CC-1 on or about February 24 and June 2, 2024. *See supra* ¶ 46(b).

sent a total of approximately more than $17,000 over the course of 14 transactions to accounts in the name of SABASSI or Ikram. At least three of these transactions in or about April 2023 included a note referencing "Al-Qureshi Executives – Eid Al-Fitr 2023." Based on my review of the contract between Gaza Now, CC-2, and the Al-Qureshi Executives, my participation in this investigation, and my conversations with other law enforcement officers, I understand that Gaza Now and the Al-Qureshi Executives hosted purported charity events on the Eid festivals in 2023 as they did in 2022. *See supra* ¶ 30. Accordingly, I believe these transactions from CC-2 to SABASSI and/or Ikram are related to those purported charity events.

49. In addition, based on my review of financial records and messages exchanged between REDA MAZEN RIDA SABASSI, the defendant, and CC-1, I have learned that between on or about July 27 and 29, 2022, SABASSI transferred a total of approximately $2,840 to CC-1, including approximately $2,100 that originated from CC-2. Between on or about July 18 and July 20, 2022, CC-1 messaged SABASSI that SABASSI would be receiving "2100 soon" on a specified remittance platform and that another individual "from Britain" would be sending it. In addition, CC-1 also sent SABASSI two graphics, which CC-1 described as the logo for the individual from Britain. Those graphics included the logos for Gaza Now and the Al-Qureshi Executives and were similar to the ones included on the containers of candy that were handed out by Individual-1 and PIJ soldiers during the 2022 purported "charity" events, *see supra* ¶ 30(b). On or about July 28, 2022, CC-2 sent approximately $2,100 to SABASSI's account on the remittance platform, which SABASSI then transferred to his bank account. That same day, SABASSI wired approximately $2,000 to Gaza Now. The next day, SABASSI wired approximately $600 to Gaza Now. Based on my review of the contract between Gaza Now, CC-2, and the Al-Qureshi Executives, *see supra* ¶ 30(a); the messages between CC-1 and SABASSI, including messages that contained graphics similar to the ones included on the containers during the charity events described in the contracts, *see supra* ¶ 30(c); and the fact that these transfers were shortly after the July 2022 event, *see supra* ¶ 30(b), I believe that these transfers were related to the charity event depicted in the files found in Email Account-1, which were described in the contract between Gaza Now, CC-2, and the Al-Qureshi Executives.

50. Based on my review of financial records for an account used by REDA MAZEN RIDA SABASSI, the defendant, at a financial technology company specializing in international money transfers, I have learned that between on or about June 29, 2022, and on or about September 27, 2023, Ikram sent a total of approximately $70,176.18 to Gaza Now.

51. In addition, REDA MAZEN RIDA SABASSI, the defendant, appears to have purchased plane tickets on behalf of CC-1 and CC-3. Based on my review of records from a U.S. bank ("Bank-2"), I have learned the following, in substance and in part:

a. On or about December 15, 2023, January 4, 2024, and February 20, 2024, SABASSI's account purchased plane tickets to Istanbul in the name of CC-1.

b. On or about February 1, 2024, SABASSI's account purchased a plane ticket to Istanbul in the name of CC-3.

VII. SABASSI DIVERTED A PORTION OF THE FUNDS RAISED FOR HAMAS FOR HIS PERSONAL USE

52. For the reasons set forth below, I believe that REDA MAZEN RIDA SABASSI, the defendant, diverted at least some of the funds he raised through the Fundraisers for personal use. Based on my review records from Bank-1, I have learned, in substance and among other things and as further detailed below, the following:

a. SABASSI had at least three accounts at Bank-1, which have since been closed: (i) an account ending in 3589 (the "3859 Sabassi Account"), (ii) a savings account ending in 2717 (the "2717 Sabassi Account"); and (iii) the 5258 Ikram Account.

b. As of January 2, 2024, the balance in the 3859 Sabassi Account was approximately $104. In or about January 2024, SABASSI sent approximately $23,000 raised through Fundraiser-1 and Fundraiser-2 to the 3859 Sabassi Account. Throughout January 2024, money was then transferred from the 3859 Sabassi Account to the 2717 Sabassi Account, and then back to the 3859 Sabassi Account, with no apparent legitimate purposes for these transfers. After SABASSI began transferring funds from the Fundraisers to his 3859 Sabassi Account, he transferred approximately $24,000 in various payments from the 3859 Account for SABASSI's rent, credit card payments, and the Sabassi Crypto Account, among other personal uses.[24]

c. SABASSI and CC-1's social media and message platform communications about the Fundraisers represented that the funds raised would be used for beneficiaries in Gaza and did not disclose that SABASSI would use funds raised for personal expenditures.

VIII. SABASSI'S LIES TO LAW ENFORCEMENT

53. I believe there is probable cause to believe that REDA MAZEN RIDA SABASSI, the defendant, lied to FBI agents during his voluntary interview with them on March 27, 2024, in San Diego, California. Based on my participation in that interview, my conversations with other law enforcement officers who participated in that interview, and my review notes and a report from that interview, I have learned the following, in substance and in part:

a. Prior to the start of the interview, law enforcement identified themselves, advised SABASSI that the interview was voluntary and that he was free to leave at any time, advised that they were visiting from the New York Field Office, and advised that it was a violation of federal law to lie to law enforcement.

[24] The only other deposits to the 3859 Sabassi Account during this time period were salary payments totaling approximately $6,840 and miscellaneous deposits totaling approximately $2,125, which were insufficient to pay the approximately $24,000 in personal expenditures SABASSI made after depositing funds from Fundraiser-1 and Fundraiser-2. Also, during this time period, the 2717 Sabassi Account had no deposits other than the Fundraisers funds transferred from the 3859 Sabassi Account to the 2717 Sabassi Account and then re-transferred to the 3859 Sabassi Account.

b. During that interview, SABASSI falsely stated that he never had contact with CC-1. I believe SABASSI knowingly made this statement falsely because, as set forth in more detail above, SABASSI, among other things, (i) exchanged messages with phone numbers used by CC-1 since at least in or about 2017, *see supra* ¶¶ 35, 43; (ii) sent or received thousands of dollars to or from various accounts in CC-1's name, *see supra* ¶¶ 47-51; (iii) accessed CC-1's account on a remittance platform, *see supra* ¶ 36; (iv) sent approximately $116,000 to CC-3 (CC-1's brother) over the course of multiple transactions, *see supra* ¶ 46(d); and (v) SABASSI's account at Bank-2 purchased plane tickets in the names of CC-1 and CC-3, *see supra* ¶ 51.

c. SABASSI falsely stated that he never sent any money to CC-1 or members of CC-1's family. I believe SABASSI knowingly made this statement falsely because, as set forth in more detail above, SABASSI (i) sent thousands of dollars to accounts in CC-1's name since at least in or about October 2018, *see supra* ¶¶ 47, 49; (ii) sent approximately $116,000 to an account in CC-3's name, *see supra* ¶ 46(d); and (iii) SABASSI's account at Bank-2 purchased plane tickets in the names of CC-1 and CC-3, *see supra* ¶ 51.

d. SABASSI falsely stated that he did not spend any additional money from the Fundraisers on his personal credit card, rent payments, or personal expenses. I believe SABASSI knowingly made this statement falsely because, as set forth in more detail above, SABASSI diverted some of the funds raised through Ikram to pay for his rent and his personal credit card in or about January 2024. *See supra* ¶ 52.

* * *

WHEREFORE, I respectfully request that a warrant be issued for the arrest of REDA MAZEN RIDA SABASSI, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s Schuyler Kenney (By Court with Authorization)
SCHUYLER KENNEY
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 15th day of June, 2026.

THE HONORABLE SARAH L CAVE
United States Magistrate Judge
Southern District of New York

AO 442 (Rev. 11/11) Arrest Warrant AUSA Name & Telno: Jennifer N. Ong, 212-637-2224

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America
v.
Reda Mazen Rida Sabassi

Case No. 26 MAG 2344

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Reda Mazen Rida Sabassi ,

who is accused of an offense or violation based on the following document filed with the court:

❒ Indictment ❒ Superseding Indictment ❒ Information ❒ Superseding Information ☑ Complaint

❒ Probation Violation Petition ❒ Supervised Release Violation Petition ❒ Violation Notice ❒ Order of the Court

This offense is briefly described as follows:

18 U.S.C. 2339B (provision of material support to a foreign terrorist organization), 1349 (wire fraud conspiracy), 1956(h) (money laundering conspiracy), 1001 (false statements), 50 U.S.C. 1705 (International Emergency Economic Powers Act)

Date: 6/15/2026

Issuing officer's signature

City and state: New York, New York

USMJ, Sarah L. Cave

Printed name and title

Return

This warrant was received on *(date)* _____ , and the person was arrested on *(date)* _____

at *(city and state)* _____ .

Date: _____

Arresting officer's signature

Printed name and title