

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, [REDACTED] being first duly sworn, hereby depose and state as follows:

PURPOSE OF AFFIDAVIT

1. I make this affidavit in support of an application for an arrest warrant for ZAID MOHAMMAD MAHDAWI.

2. Your affiant, [REDACTED], is a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Washington Field Office. I have been a Special Agent since February of 2019, during which time I have investigated criminal violations involving international terrorism, domestic terrorism, and violent crimes against children. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of federal criminal laws.

3. The facts of this affidavit come from my review of the evidence, my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I have hearsay knowledge. This affidavit merely intends to show that sufficient probable cause exists for the requested warrants and does not set forth all of my knowledge about this matter.

FACTUAL BACKGROUND

4. On July 24, 2024, several groups applied for and were granted permits to demonstrate on the National Mall. An organization was granted a sole permit for the area of Columbus Circle, which is located at the intersection of Massachusetts Avenue Northeast and E Street Northeast, Washington, D.C., directly in front of Union Station.

5. In anticipation of the demonstrations, members of the United States Park Police (“USPP”), U.S. Capitol Police (“USCP”), and the Metropolitan Police Department (“MPD”) were present around Columbus Circle and other parts of downtown Washington, D.C.

6. Demonstrators began to gather in Columbus Circle starting at approximately 2:50 p.m. At approximately 3:26 p.m., the USPP revoked the permit that had been issued to the organization. Pursuant to regulation, organizers must undertake, in good faith, all reasonable action to provide sufficient “marshals” to ensure good order and self-discipline during the demonstration. *See* 36 CFR 7.96 (g)(5)(xii). The USPP attempted to locate the organization’s marshals multiple times but were unable to find them. At approximately 3:26 p.m., a USPP Lieutenant called the individual permit holder. The permit holder failed to answer his phone and the call went directly to voicemail. The USPP Lieutenant left a voicemail officially revoking the organization’s permit.

7. Despite the revocation of the permit, demonstrators remained in and around Columbus Circle until approximately 5:00 p.m. From approximately 2:59 p.m. until 5:00 p.m., individuals in Columbus Circle pulled down flags affixed to the flagpoles; burned flags and objects; interfered with law enforcement’s ability to place individuals under arrest; and sprayed graffiti on multiple statutes and structures.

8. The flags pulled down from the flag poles, and the statutes and structures in Columbus Circle, are all property of the federal government. The National Park Service estimated the total cost to clean up and repair the site at \$11,282.23.



Figure 1: Picture of Columbus Circle, Including the Fountain and Three Flagpoles

FACTS SUPPORTING PROBABLE CAUSE

9. On July 24, 2024, between approximately 3:30 p.m. and 3:45 p.m., an individual later identified as ZAID MOHAMMAD MAHDAWI climbed the monument located in the center of Columbus Circle, which was captured on video footage filmed by USPP from an observation post (hereinafter “USPP OP footage”) looking down at Columbia Circle. The same event was captured in open-source video and photos later posted to various internet platforms.



Figure 2: Still from USPP OP Footage Showing MAHDAWI Putting His Hands Up to Climb the Monument (Circled in Yellow)

10. MAHDAWI wore black pants, a red shirt, a white and red Keffiyeh around his neck, and white Nike sneakers. Immediately before scaling the monument, MAHDAWI retrieved a green piece of clothing and wrapped it around his neck, pulling it over his nose to conceal part of his face, which was captured on USPP OP footage:



Figure 3A: MAHDAWI before Scaling the Monument without the Green Clothing



Figure 3B: MADHAWI Immediately Before Climbing the Monument After Putting on the Green Clothing

11. As MAHDAWI climbed, he carried with him a can of spray paint with a red cap.



Figure 4: Still from USPP OP Footage Showing MAHDAWI Climbing with Spray Can

12. After climbing to a ledge, MAHDAWI began to spray paint the monument.



Figure 5: Still from USPP OP Footage Showing MAHDAWI Begin to Spray Paint

13. MAHDAWI spray painted “HAMAS IS COMIN” across a side of the Columbus monument.¹



Figure 6: Open-Source Photo of MAHDAWI Spray Painting “HAMAS IS COMIN”

¹ As of September 2024, the Islamic Resistance Movement, or “ Hamas,” is a designated foreign terrorist organization by the United States State Department (<https://state.gov/foreign-terrorist-organizations/>). Hamas governs the Gaza strip south of Israel.

14. After completing the phrase, MAHDAWI spray-painted an inverted red triangle above the slogan.



Figure 7: Inverted Red Triangle Above “HAMAS IS COMIN”

Identification of MAHDAWI

15. On July 30, 2024, the National Park Service issued a USPP bulletin seeking information on five individuals who engaged in criminal activity on July 24, 2024, which included the following image:



Figure 8: Image of Individual from USPP Bulletin Seeking Information

16. The same day the bulletin was posted, USPP received a tip from Witness-1, which USPP forwarded to the FBI. Witness-1 stated that they believed the individual in the bulletin (“Suspect-1) went to their gym in Richmond, Virginia.

17. On August 6, 2024, FBI agents conducted a telephonic interview of Witness-1 and learned that Witness-1 often saw Suspect-1 at their gym, and that Suspect-1 likely drove a white sedan. Subsequently, law enforcement conducted physical surveillance outside of the gym and observed a white sedan with a Virginia license plate.

18. Law enforcement queried the license plate, which came back to a vehicle owned by MAHDAWI’s father. Through subsequent searches of law enforcement databases, law enforcement came upon MAHDAWI’s name. Law enforcement reviewed MAHDAWI’s Virginia Department of Motor Vehicle picture, and the individual in the photo appeared to be the same individual pictured in the USPP bulletin.

19. Additionally, law enforcement databases revealed that MAHDAWI had previously been arrested in Richmond, Virginia on two occasions (December 2023 and April 2024). In May

2024, RPD took a photograph of MAHDAWI during a demonstration. In the photo, MADHAWI wore the same shoes that he is pictured wearing on July 24, 2024:



Figure 9: Photo of MAHDAWI in Richmond in May of 2024

20. On August 30, 2024, Witness-1 contacted the FBI a second time, and relayed that they saw Suspect-1 at the gym again. Witness-1 said that Suspect-1 was wearing shoes that matched the shoes worn by the individual depicted in the bulletin.

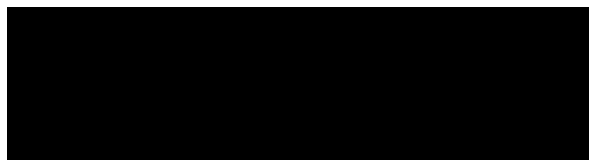
21. Through this investigation, your Affiant learned that an RPD Officer (“Officer-1”) knew MAHDAWI personally. Specifically, Officer-1 has known MAHDAWI for over five years. Officer-1 initially met MAHDAWI at a religious gathering, and since then has met with MAHDAWI hundreds of times in a social setting.

22. On September 3, 2024, FBI Task Force Officers showed Officer-1 an open-source video, along with three open-source photos, of the individual spray painting “HAMAS IS COMIN” on the monument at Columbus Circle on July 24, 2024. Officer-1 identified the individual depicted in the video and photos as ZAID MAHDAWI.



Figure 10: Still from Open-Source Video Shown to Officer-1

23. Based on the foregoing, your affiant submits there is probable cause to believe that MAHDAWI violated 18 U.S.C. § 1361 by willfully injuring or deprecating any property of the United States in an amount less than \$1,000.



Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 2 day of October 2024.

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE