UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

SEP 15 2026 AM 11:56
FILED - USDC - FLMD - TPA

SEALED

UNITED STATES OF AMERICA

v.

CASE NO. 8:26-CR-285-KKM-SPF

RAED YOUSEF
a/k/a "RAED MOHAMED SALIM SULEIMAN"

18 U.S.C. § 2339B(a)(1)
(Conspiracy to Provide Material Support to a Foreign Terrorist Organization and Attempt to Provide Material Support to a Foreign Terrorist Organization)
50 U.S.C. §§ 1701-1706
(Conspiracy to Provide Funds, Goods, and Services to a Specially Designated Terrorist Organization and Attempt to Provide Funds, Goods, and Services to a Specially Designated Terrorist Organization)
18 U.S.C. § 1956(h)
(Conspiracy to Commit Money Laundering)
18 U.S.C. § 1956(a)(2)
(Money Laundering)
18 U.S.C. § 1542
(False Statement on a Passport Application)

SEALED

INDICTMENT

The Grand Jury charges:

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

A. Introduction

At times material to this Indictment:

1. Raed YOUSEF was born in Kuwait and became a naturalized United States Citizen on February 22, 1991. YOUSEF resides in the Middle District of Florida. YOUSEF also possesses a Jordanian passport in the name "Raed Mohamed Salim Suleiman."

2. Co-Conspirator 1 is a French national who resides in France. Co-Conspirator 1 is the registered owner of French Organization 1.

3. French Organization 1 purports to provide financial, material, and physical aid to those in Africa and the Middle East. French Organization 1 was established on or about October 13, 2023.

4. Co-Conspirator 2 is a Palestinian national who resides in the Gaza Strip. Co-Conspirator 2 is a member of, and associated with, HAMAS.

5. Co-Conspirator 3 was born in the United States and is a United States citizen residing in the Eastern District of Louisiana.

6. YOUSEF, Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, and others conspired to provide thousands of dollars to the foreign terrorist organization, HAMAS.

BACKGROUND ON HAMAS

7. The Harakat al-Muqawamah al-Islamiyya is Arabic for "The Islamic Resistance Movement" and is known by the acronym HAMAS. HAMAS is a terrorist organization based in the West Bank and Gaza Strip (collectively, "Gaza"). HAMAS was founded in 1987 by Sheikh Ahmed Yassin as an outgrowth of the Muslim Brotherhood. The Muslim Brotherhood is an international Islamic organization founded in Egypt in 1928 that is committed to the globalization of Islam through social engineering and violent *jihad* (holy war). HAMAS' published charter states that HAMAS' purpose is to create an Islamic Palestinian state throughout Israel by eliminating the State of Israel through violent *jihad*. HAMAS has not only directed its violence and terrorism against Israeli targets in furtherance of that goal, but also attacked American citizens as part of its campaign to undermine Israel's right to exist. HAMAS has murdered and injured dozens of Americans as part of its campaign of violence and terror.

8. HAMAS achieves its goals through its military wing, known as the Izz el-Din-al Qassam Brigades, a social wing known as Dawa ("preaching" or "calling"), and a political wing known as the Political Bureau. Although these wings have different responsibilities, the organization operates together to achieve the overall objectives of the terrorist group.

9. HAMAS's Political Bureau sits above the social and military wings and serves as the highest-ranking leadership body in HAMAS. The Political Bureau is

responsible for setting policies and guidelines regarding HAMAS activities, including directing and coordinating terrorist attacks.

10. HAMAS's social wing operates as a social welfare agency providing food, medical care, and education to Palestinians in order to generate loyalty and support for the organization and its overall goals. HAMAS also supports religious and academic institutions that facilitate the teaching of HAMAS and introduce its radical and violent ideology at the earliest stages of spiritual and educational development. The social engineering is critical to winning the hearts and minds of the Palestinian people and to creating a military and operational recruitment pool for HAMAS. Additionally, HAMAS rewards past terrorist acts and provides incentive for future acts by financially subsidizing family members of HAMAS operatives who are killed, injured or imprisoned, and ensuring that the families are revered in the community. HAMAS's social infrastructure is supported by numerous financial sources located around the world, including individuals in the United States. Due to HAMAS's substantial expenditures and the fungible nature of money, some money collected under humanitarian banners is routed to military and operational use, in addition to freeing up other funds for specific terrorist acts—including the provision of weapons, explosives, transportation services, safehouses, and salaries for operatives.

11. HAMAS's military wing is responsible for carrying out suicide bombings and other terrorist attacks within Israel, the West Bank and Gaza, and has done so for decades. These attacks include large-scale bombings against Israeli

civilian targets, small-arms attacks, improvised roadside explosives, and rocket attacks.

12. HAMAS has carried out numerous 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 Jerusalem Central Bus Station. Approximately one week later, a second HAMAS suicide bomber boarded another bus in Jerusalem and detonated an explosive belt. Three United States citizens were killed in these attacks. HAMAS publicly claimed credit for both suicide attacks.

b. On or about July 30, 1997, two suicide bombers detonated explosive devices in an open-air market in Jerusalem. One United States citizen was killed and one United States 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 United States citizen was killed and ten United States 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 United

States citizens were killed, and three United States 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 United States citizens were killed, and four United States 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 United States 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"), 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 '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 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."

13. On October 7, 2023, at approximately 6:30 a.m. in Israel, the terrorist organization HAMAS launched the deadliest terror attack in Israel's history. Using the cover of a massive rocket attack, thousands of HAMAS terrorists and affiliated supporters swarmed over the border between the Gaza Strip and Israel and launched wave after wave of attacks, killing dozens of Israeli civilians (hereinafter, the "October 7 HAMAS Massacres"). Many of these murders occurred in kibbutzim near the Gaza border, where HAMAS and its supporters went house to house murdering or kidnapping, including children and the elderly, sometimes entire families. Some victims of the attack were shot point-blank with rifles, some were tortured, some were sexually assaulted, some were beheaded. The over 1,200 people murdered and 250 kidnapped by HAMAS and its supporters on October 7, 2023, included approximately 50 Americans murdered on October 7 (or who later died as a

result of wounds sustained on October 7),[1] 6 Americans taken hostage and later released alive, and 1 American (US Victim 1) taken hostage and killed in captivity.

14. The initial wave of attackers was largely from HAMAS's "Nukhba" fighters, the elite special forces unit of HAMAS's military wing. At approximately 7:53 a.m., however, then-commander of HAMAS's military wing, Mohammad Al-Masri, a/k/a "Mohammed Deif," a/k/a "Muhammad Al-Deif," a/k/a "Abu Khalid Al-Dayf" ("Deif"),[2] issued a message announcing the "Al-Aqsa Flood Operation" and inviting "the masses" to rise up and join HAMAS in its fight to destroy Israel. He stated that in just the first 20 minutes of the Operation, HAMAS had launched over 5,000 rockets and missiles targeting Israel. He called on "all Arab and Islamic forces to unite" to follow HAMAS's "directives and instructions," and advised any who would join HAMAS's attack to "kill [Israelis] wherever you overtake them," to "[o]rganize your attacks on the settlements with all the means and tools available to you," and to "establish[] the state, with blood and martyrdom." He stated:

> Today, today, everyone who has a rifle, take it out, as now is the time. And whoever doesn't have a rifle, take out your machete, your axe, your hatchet, your Molotov cocktail, your truck, your bulldozer, or your car. Today, today, history opens its brightest, most glorious, and most honorable pages. So, who will record his name, the name of his family, and the name of his town in the pages of light and glory?

---

[1] This figure includes four Americans killed on October 7 whose bodies were held hostage by Hamas.

[2] On September 8, 2015, the Department of State designated Deif as a Specially Designated Global Terrorist pursuant to Executive Order 13224.

15. Following this message, thousands of additional attackers swarmed across the border from Gaza into Israel in support of HAMAS' invasion. There, they assisted HAMAS in murdering and kidnapping civilians.

16. The October 7 HAMAS Massacres marked the beginning of what has become the Israel-HAMAS war. A ceasefire agreement between Israel and HAMAS was reached on or about January 15, 2025, and went into effect on or about January 19, 2025. On or about March 18, 2025, the Israeli Prime Minister's Office released a statement indicating that he had authorized "the renewal of military action" against HAMAS.

17. Following the October 7 HAMAS Massacres, HAMAS used the Al-Shifa Hospital and other medical centers in Gaza for command-and-control centers, terror tunnels, weapons storage, and hiding kidnapped hostages. Between on or about October 7, 2023, and on or about May 1, 2025, numerous hostages taken by HAMAS died in captivity or were released as part of a ceasefire deal with Israel.

18. HAMAS has a significant media and online presence, through which it furthers its terrorist agenda. HAMAS disseminates propaganda through a variety of means, including through a satellite television channel called "al-Aqsa TV" ("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), which is based in Gaza, as well as through various online accounts, including Snapchat, Twitter and Telegram accounts.

19. HAMAS has used its online presence and social media accounts to broadcast portions of, and glorify, the October 7 HAMAS Massacres. HAMAS has used its online presence and social media accounts to disseminate propaganda about and promote HAMAS's violent activities and aims. 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.

20. 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 crowdfunding website or remittance platforms. Often times, 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.

21. Beginning in or about early 2019, HAMAS, through its military wing, tested virtual currency fundraising by soliciting donations on its Telegram channel. HAMAS's military wing boasted that bitcoin donations were untraceable and would be used for violent causes. Their websites offered video instruction on how to anonymously make donations, in part by using unique bitcoin addresses generated for each individual donor.

22. The National Bureau for Counter Terror Financing ("NBCTF") was established by Israel to unify and concentrate efforts to counter financial infrastructure of terrorist organizations. NBCTF seizes crypto wallets that are the property of, or controlled by, Foreign Terrorist Organizations, like HAMAS. By July 2021, following October 7 HAMAS Massacres, 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 and ByBit.

RELEVANT LAW

23. The International Emergency Economic Powers Act ("IEEPA"), codified at Title 50, United States Code, Sections 1701 to 1708, 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).

24. On October 8, 1997, the United Snited States Secretary of State designated HAMAS as a Foreign Terrorist Organization ("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 Muqawama 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. To date, HAMAS remains a designated FTO.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 Global Terrorism Sanctions Regulations ("GTSR"), implementing the sanctions imposed by the Executive Order.

25. 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.

26. Section 594.204 of the GTSR further prohibits any United States 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 United States Secretary of State designated Hamas as an SDGT pursuant to Executive Order 13224.

C. The Conspiracy

27. Beginning in or around June 2023, the exact date being unknown to the Grand Jury, and continuing until in or around the date of this Indictment, in the Middle District of Florida and elsewhere, the defendant,

RAED YOUSEF,
a/k/a "RAED MOHAMED SALIM SULEIMAN,"

did knowingly conspire, and agree with other persons, known and unknown to the Grand Jury, to provide material support, namely, currency and monetary instruments, to a foreign terrorist organization, namely, HAMAS, which at all relevant times was designated by the Secretary of State as a Foreign Terrorist Organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that HAMAS was a designated Foreign Terrorist Organization and that HAMAS has engaged and was engaging in terrorist activity and terrorism.

D. Manner and Means

28. The manner and means by which the co-conspirators sought to accomplish the object of the conspiracy included, among others:

a. It was part of the conspiracy that YOUSEF and his co-conspirators would and did attempt to provide material support and resources to the designated Foreign Terrorist Organization and Specially Designated Terrorist, that is HAMAS, by raising funds in the United States and elsewhere, and sending those funds to Co-Conspirator 1, Co-Conspirator 2, and French Organization 1 for HAMAS;

b. It was further part of the conspiracy that Co-Conspirator 2 was and is a member of HAMAS;

c. It was further part of the conspiracy that Co-Conspirator 2 would and did solicit money for HAMAS using various social media platforms and encrypted messaging platforms, including Snapchat, Instagram, Telegram, and WhatsApp;

d. It was further part of the conspiracy that Co-Conspirator 2 would and did direct people to official HAMAS platforms, including HAMAS's Telegram account and HAMAS's official website;

e. It was further part of the conspiracy that using various social media and encrypted messaging platforms, Co-Conspirator 2 would and did instruct donors to PayPal, GoFundMe, crowdfunding websites, cryptocurrency wallets, and

money transfer services associated with Co-Conspirator 1, Co-Conspirator 2, and French Organization 1;

f. It was further part of the conspiracy that the funds donated to Co-Conspirator 1 and French Organization 1 through PayPal, GoFundMe, crowdfunding websites, and money transfer services would and did get converted to cryptocurrency and sent to cryptocurrency wallets owned and controlled by Co-Conspirator 2;

g. It was further part of the conspiracy that Co-Conspirator 2 would and did provide the cryptocurrency received from Co-Conspirator 1 and French Organization 1 to HAMAS or accounts controlled by, and associated with, HAMAS;

h. It was further part of the conspiracy that Co-Conspirator 3 would and did provide YOUSEF with guidance regarding how to donate to Co-Conspirator 2 through Co-Conspirator 1 and French Organization 1;

i. It was further part of the conspiracy that YOUSEF would and did send money to a PayPal account associated with Co-Conspirator 1 and French Organization 1 on several occasions;

j. It was further part of the conspiracy that Co-Conspirator 3 and YOUSEF would and did solicit donations on behalf of Co-Conspirator 2;

k. It was further part of the conspiracy that the co-conspirators would and did use coded language, including referring to HAMAS as "green," "the

bread people," "people of the bread" or "bread" to conceal the true nature of their conversations;

l. It was further part of the conspiracy that YOUSEF and his co-conspirators would and did attempt to conceal the ultimate recipient of their donations, that is HAMAS;

m. It was further part of the conspiracy that YOUSEF and his co-conspirators would and did advocate for the destruction of the State of Israel and glorified the killing of Jewish people;

n. It was further part of the conspiracy that YOUSEF would and did take several steps that were inconsistent with making donations to legitimate charities;

o. It was further part of the conspiracy that co-conspirators would and did employ various techniques to protect their anonymity and to thwart detection of their activities by government and law-enforcement agencies; and

p. It was further part of the conspiracy that co-conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

E. Overt Acts

29. Unless otherwise stated, the quoted excerpts contained herein were translated from Arabic to English by a Linguist. In furtherance of the conspiracy, and to affect the objects thereof, at least one of the co-conspirators committed or caused

to be committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

a. Beginning in or around 2023, Co-Conspirator 2 and Co-Conspirator 3 communicated about *jihad* and donating money to HAMAS.

b. On or about October 13, 2023, Co-Conspirator 1 established French Organization 1.

c. In or around October 2023, Co-Conspirator 3 recruited potential donors, including YOUSEF, to donate funds to HAMAS through Co-Conspirator 1, Co-Conspirator 2, and French Organization 1.

d. On or about October 19, 2023, YOUSEF requested Co-Conspirator 2's contact information and asked how to send money to Co-Conspirator 2.

e. On or about October 19, 2023, Co-Conspirator 3 sent YOUSEF multiple Western Union Accounts associated with family members of Co-Conspirator 2 and explained that YOUSEF could utilize any of the Western Union Accounts to send Co-Conspirator 2 money.

f. On or about October 25, 2023, Co-Conspirator 3 sent YOUSEF screen recordings and screenshots from Co-Conspirator 2's social media accounts, which included links to Co-Conspirator 1 and French Organization 1's PayPal Account.

g. On or about November 4, 2023, Co-Conspirator 3 told YOUSEF that the money sent via the PayPal links associated with Co-Conspirator 1

and French Organization 1 reached the "true men" and was not just for the "babies, public people, or the needy ones" but it also "gets to the other people—the men."

h. On or about November 4, 2023, Co-Conspirator 3 told YOUSEF that when discussing donations sent to Co-Conspirator 1 and 2, "we tell them, we say bread, I mean if you want anything you talk and say this amount of money is for bread and we will understand.... because everything being talked about on here, I mean uh...uh...they are listening ...."

i. On or about November 4, 2023, Co-Conspirator 2 told Co-Conspirator 3 that said: "My brother, Abid, don't speak more openly. I understand, I understand. One portion, tell me one portion goes to the 'bread', that's it. I'll understand what 'bread' means. We use this way to deal [with each other]. We say, We need 'bread', or we need to send this to the 'bread', or we need that much of 'bread', or we need that number of bundles of 'bread'. When we speak among each other, we use the word, 'bread'. We say, We need this amount to buy 'bread' only. That's all what we want. Anyway, peace be upon our prophet Muhammad, I'll soon send you the link for PayPal. As I told you, try [to transfer] five or ten dollars at the beginning, and they will get to the people who know more about it."

j. On or about November 4, 2023, Co-Conspirator 2 told Co-Conspirator 3 that said: "Take caution! We have sent a lot to the bread folks, be careful. We sent the bread folks too much for the bread. We coordinated everything with them because things are tough for everybody. But, and thanks to God, they have received the bread, and they thank all of you and pray for God to reward you

for the good deed. A portion of what we receive goes to the children, to the displaced, and those who are in bad need; and the other portion goes to the bread people."

k. On or about November 5, 2023, YOUSEF warned Co-Conspirator 3 to "be very careful, be careful of those messages" and to "delete them, I mean, one by one [as you send]. If you are chatting with anybody, or if you are sending anything, especially for that 'bread' thing. Be careful."

l. On or about December 29, 2023, Co-Conspirator 2 told Co-Conspirator 3 that money sent to Co-Conspirator 1 and French Organization 1 through the PayPal Account associated with Co-Conspirator 1 and French Organization 1 was deposited into a bank account in France and converted into cryptocurrency before being sent to Co-Conspirator 2 in Gaza.

m. On or about January 19, 2024, Co-Conspirator 2 told Co-Conspirator 3 that "we will deliver your bread to the bread people. I understand, yes. I understand every word you say."

n. On or about January 28, 2024, Co-Conspirator 3 told YOUSEF that "the bread people, I am talking about the bread people, hope you will understand what I am saying, eh…is bad, and they're in bad need for anything… You told me that you provide… to other organizations, but I am telling you I know people from another door that nobody knows about."

o. On or about January 28, 2024, Co-Conspirator 3 forwarded YOUSEF a message from Co-Conspirator 2 that stated the money sent to Co-

Conspirator 2 was "received by the bread people. This is with Allah's grace. After being disconnected, we are able to communicate with them--the bread people, do you understand me? Praise be to Allah, praise be to Allah, praise be to Allah... I wanted to convey this message to whoever donated the bread. I wanted you to know this matter."

p. On or about January 28, 2024, Co-Conspirator 3 sent YOUSEF a link to the PayPal Account associated with Co-Conspirator 1 and French Organization 1 and the Snapchat account for Co-Conspirator 2.

q. On or about January 29, 2024, YOUSEF asked Co-Conspirator 3 for the PayPal account associated with Co-Conspirator 1 and shortly after, Co-Conspirator 3 responded with a screen recording showing YOUSEF how to use PayPal to send money to Co-Conspirator 1.

r. On or about January 30, 2024, YOUSEF sent $957.19 to the PayPal Account associated with Co-Conspirator 1 and French Organization 1 and told Co-Conspirator 3 that "it worked" and that he sent $1,000 to Co-Conspirator 1.

s. On or about January 30, 2024, YOUSEF and Co-Conspirator 3 discussed obtaining donations from others to send to Co-Conspirator 1; during the conversation YOUSEF told Co-Conspirator 3 to "tell people ah.. to distribute... don't talk about the...other things like the bread and such. Just tell them these are needy people in Gaza, and these are people who can deliver. That would be better, because a lot of people will be afraid when you tell them...I mean, they don't want to get in trouble, okay?"

t. On February 3, 2024, Co-Conspirator 2 told Co-Conspirator 3 "I also was going to tell you to be very careful, watch out for yourself because you are not in Gaza, you're in a country I mean as they say, they hold you accountable for one dollar. You need to pay attention when you take to know who you are taking from and you have to pay attention when someone donates, from whom he donated, whereas you protect yourself, my brother...I also want you, brother, to be very careful and take care of yourself in a way that you do not- not put yourself in harm's way."

u. On or about April 25, 2024, YOUSEF told Co-Conspirator 3 that "[b]y God, those – those – Jews are brutal – I mean – after Gaza – er – er – they are going to turn their sight on the West Bank – they are saying – May God take revenge against them – and let us see the day they get what they deserve."

v. On or about August 23, 2024, YOUSEF told Co-Conspirator 3 that he spoke to Co-Conspirator 2 and that Co-Conspirator 2 "knows the people over there, in the ah... ah... I told him, I told him let them then cut off heads and show the whole world, like what the fucking Jews are doing to us over there, but he didn't do anything you know. You see, you need to frighten them and scare them so they can flee from our land man! Then after they hit them, they need to behead them and show that on, ah on ah... social media, so they can be frightened and scare them to death."

w. On or about August 23, 2024, YOUSEF told Co-Conspirator 3 that "people need to be slaughtered; they need to be slaughtered, to behead them and

display their heads. One would hold their heads, one in this hand and another head in the other hand and display their heads to frighten them so that they leave our land, man....We need to fuck them up, you know! This is bullshit that one keeps saying take it easy, actually you need to scare those people. Those, those people are frightened Okay! You need to frighten them and fuck them up until they leave our land."

x. On or about August 23, 2024, YOUSEF told Co-Conspirator 3 that "after the death of Hanniyah[3], may God have mercy on his soul, Al-Sinwar took over. Al-Sinwar began to carry out martyrdom operations in Tel Aviv, here and there, where he began to send, send them. Kindness doesn't work with those [Isrealis]... they don't...you need to be very, very tough with them, the same way they are treating you, very tough, I mean you have to be very tough too. You...ah—I mean you have to cut off heads, cut...cut them apart. I mean, make one uh – with those...with those...assholes."

y. On or about October 17, 2024, YOUSEF sent Co-Conspirator 3 an official statement by HAMAS regarding the death of then HAMAS leader Yahya Al-Sinwar. During the conversation, Co-Conspirator 3 and YOUSEF exchanged a message from the official HAMAS telegram channel regarding the death of Al-Sinwar.

[3] Ismail Haniyeh was the top political leader of Hamas, serving as the head of its political bureau from 2017 until he was killed in 2024.

z. On or about December 22, 2025, Co-Conspirator 2 told an online covert employee ("OCE") that the money he receives "gets to me and gets to the Green. Do not worry."

aa. On or about December 22, 2025, Co-Conspirator 2 told an OCE that he "received funds, whatever the amount, and I must deliver to them. I received funds, whatever the amount is, and I must deliver it monthly. The important thing you must know that it is called bread, bakeries. For example, say [Co-Conspirator 3] my brother, this amount is for your work and the other amount is to buy bread, or give it to the bakeries; let them bake with it. The word and the language to use is bread and bakeries, so know that language."

bb. On or about December 22, 2025, Co-Conspirator 2 told an OCE not to use the word green and "if we are done speaking, delete your messages, and I will delete mine."

cc. On or about December 5, 2025, Co-Conspirator 3 told an OCE that "you are going to transfer to a charitable organization and the money goes to France where [Co-Conspirator 2] has access the account to and manages the money in Gaza...."

dd. In addition to the $957.19 referenced in paragraph 31(s), YOUSEF sent the following amounts from the Middle District of Florida to the PayPal account of Co-Conspirator 1 and French Organization 1, located in France, on or about the following dates:

Approximate Date	Amount
On or about January 30, 2024	$957.19
On or about February 13, 2024	$957.66
On or about February 22, 2024	$1,437.58
On or about February 25, 2024	$1,725.65
On or about February 29, 2024	$1,532.34
On or about March 12, 2024	$2,395.67
On or about April 9, 2024	$1,916.14
On or about May 28, 2024	$2,394.02
On or about June 2, 2024	$3,061.50
On or about August 3, 2024	$2,383.85
On or about September 10, 2024	$2,872.35
On or about November 16, 2024	$956.45
On or about November 16, 2024	$2,000.00
On or about February 11, 2025	$1,500.00
On or about February 24, 2025	$2,000.00
On or about March 8, 2025	$3,000.00
On or about March 8, 2025	$1,000.00
On or about March 20, 2025	$3,200.00
On or about March 29, 2025	$3,000.00
On or about April 4, 2025	$3,100.00
On or about June 26, 2025	$3,000.00
On or about July 23, 2025	$2,000.00

ee. On several occasions, Co- Conspirator 1 converted funds obtained through French Organization 1's PayPal account to cryptocurrency and transferred the cryptocurrency to a cryptocurrency wallet associated with Co-Conspirator 2.

ff. From May 2023 to the date of Indictment, cryptocurrency wallets associated with Co-Conspirator 1 transferred at least $334,432 to

cryptocurrency wallets associated with Co-Conspirator 2, and Co-Conspirator 2 sent Cryptocurrency wallet ending in bLXq at least $340,967.

gg. The owner of the crypto wallet ending in bLXq then sent cryptocurrency to multiple cryptocurrency wallets seized by NBCTF for Terrorist financing.

hh. On or about October 1, 2025, NBCTF also seized a cryptocurrency wallet ending in F8dsgY and associated with HAMAS financing, which received approximately $23,000 in two transactions from Co-Conspirator 2's cryptocurrency wallet in March 2024.

ii. On or about May 21, 2025, YOUSEF told Co-Conspirator 3 that because he was traveling, he locked his messages with [Co-Conspirator 2] as he "was afraid they would ask me questions about this, you know at the airport. For him I did a locked messages, there are locked messages nobody can see them, I mean unless you put a code."

jj. On or about April 20, 2026, Co-Conspirator 3 told Co-Conspirator 2 that prior to traveling he planned to delete "all the applications in order to avoid getting into [any issues] God willing. No WhatsApp or Facebook or anything. I'm just, just going to keep my phone number, God willing. And I'm going to delete the rest of the applications and everything."

kk. On or about May 3, 2026, Co-Conspirator 3 was stopped by Israel when traveling in the Middle East; shortly after Co-Conspirator 3 told YOUSEF "I arrived in Palestine today, thank God. Buddy, be careful when you

travel...This guy who ah... who, I mean who helped us in doing good things and we do sacrifice at this place and ah... I mean we feed people through him...this guy everyone sees him like seeing the moon at night.... The know every transfer and every hello... Do you understand what I am saying. They know...how you transfer, everything...everything. And they know that you transfer to France and then from France to another place, they know everything. They even told me you are with that group and they asked me who do you know from these groups.... But anyways, for now be careful and ah...what I did...and everything is known. The game...is exposed."

All in violation of 18 U.S.C. §§ 2339B(a)(1), 2339B(d), and 3551 *et. seq.*

COUNTS TWO THROUGH SIX
(Attempt to Provide Material Support to a Foreign Terrorist Organization)

30. The allegations in paragraphs 1 through 29 of this Indictment are realleged and incorporated by reference as fully set forth herein.

31. On or about January 30, 2024, and continuing until in or around the date of this Indictment, in the Middle District of Florida and elsewhere, the defendant,

RAED YOUSEF,
a/k/a "RAED MOHAMED SALIM SULEIMAN,"

did knowingly attempt to provide material support and resources, namely currency and monetary instruments, to a foreign terrorist organization, namely, HAMAS which at all relevant times was designated by the Secretary of State as a Foreign

Terrorist Organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that HAMAS was a designated Foreign Terrorist Organization and that HAMAS has engaged and was engaging in terrorist activity and terrorism:

Count	Approximate Date	Amount	Recipient
2	On or about January 30, 2024	$957.19	Co-Conspirator 1
3	On or about March 12, 2024	$2,395.67	Co-Conspirator 1
4	On or about August 3, 2024	$2,383.85	Co-Conspirator 1
5	On or about March 8, 2025	$3,000.00	Co-Conspirator 1
6	On or about July 23, 2025	$2,000.00	Co-Conspirator 1

In violation of 18 U.S.C. § 2339B(a)(1).

COUNT SEVEN
(Conspiracy to Provide Funds, Goods, and Services to a Specially Designated Terrorist)

32. The allegations in paragraphs 1 through 29 of this Indictment are realleged and incorporated by reference as fully set forth herein.

33. Beginning in or around June 2023, and continuing until the date of this Indictment, in the Middle District of Florida, and elsewhere, the defendant,

RAED YOUSEF,
a/k/a RAED MOHAMED SALIM SULEIMAN,

did knowingly and voluntarily combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to violate Executive Order 13224, by contributing funds, goods, and services to, or for the benefit of, a Specially Designated Terrorist, namely HAMAS, by issuing wire transfers in the amounts

indicated, from bank accounts in the Middle District of Florida, to accounts operated on behalf of, or under the control of, HAMAS.

A. Manner and Means

34. Paragraphs 28(a) through (p) of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

B. Overt Acts

35. In furtherance of the conspiracy, and to effect the objects thereof, at least one of the co-conspirators committed or caused to be committed the following overt acts, among others, in the Middle District of Florida and elsewhere, as set forth in paragraphs 29(a) through (kk) of this Indictment, which are fully incorporated by reference herein.

All in violation of 50 U.S.C. §§ 1701-1706 and 31 C.F.R. § 595.201 *et.seq.*

COUNTS EIGHT THROUGH TWELVE
(Attempt to Provide Funds, Goods, and Services to a Specially Designated Terrorist)

36. The allegations in paragraphs 1 through 29 of this Indictment are realleged and incorporated by reference as fully set forth herein.

37. On or about January 30, 2024, and continuing until in or around the date of this Indictment, in the Middle District of Florida and elsewhere, the defendant

RAED YOUSEF,
a/k/a "RAED MOHAMED SALIM SULEIMAN,"

did attempt to willfully contribute funds, goods, and services to, or for the benefit of,

a Specially Designated Terrorist, namely HAMAS, by issuing wire transfers in the amounts indicated, from bank accounts in the Middle District of Florida, to accounts operated on behalf of, or under the control of, HAMAS:

Count	Approximate Date	Amount	Recipient
8	On or about January 30, 2024	$957.19	Co-Conspirator 1
9	On or about March 12, 2024	$2,395.67	Co-Conspirator 1
10	On or about August 3, 2024	$2,383.85	Co-Conspirator 1
11	On or about March 8, 2025	$3,000.00	Co-Conspirator 1
12	On or about July 23, 2025	$2,000.00	Co-Conspirator 1

In violation of 50 U.S.C. §§ 1701-1706 and 31 C.F.R. § 595.201 *et.seq.*

COUNT THIRTEEN
(Conspiracy to Commit Money Laundering)

38. The allegations in paragraphs 1 through 29 of this Indictment are realleged and incorporated by reference as fully set forth herein.

39. Beginning in or around January 30, 2024, and continuing until the date of this Indictment, in the Middle District of Florida, and elsewhere, the defendants,

RAED YOUSEF,
a/k/a RAED MOHAMED SALIM SULEIMAN,

did knowingly combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to transmit and transfer funds, that is, United States currency held in bank accounts, from a place inside the United States, that is, Florida, to a place outside the United States, that is, France, with the intent to promote the carrying on of specified unlawful activity, that is, providing material support to a Foreign Terrorist Organization, that is HAMAS, in violation of 18

U.S.C. § 2339B(a)(1), and willfully contributing funds, goods, and services to, or for the benefit of, a Specially Designated Terrorist, that is HAMAS,

in violation of 50 U.S.C. §§ 1701-1706 and 31 C.F.R. § 595.201 *et.seq*, in violation of 18 U.S.C. § 1956(a)(2).

Manner and Means

40. Paragraphs 28 (a) through (p) of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

Overt Acts

41. In furtherance of the conspiracy, and to effect the objects thereof, at least one of the co-conspirators committed or caused to be committed the following overt acts, among others, in the Middle District of Florida and elsewhere, as set forth in paragraphs 29 (a) through (kk) of this Indictment, which are fully incorporated by reference herein.

All in violation of 18 U.S.C. § 1956(a)(2).

COUNTS FOURTEEN THROUGH EIGHTEEN
(Money Laundering)

42. The allegations in paragraphs 1 through 29 of this Indictment are realleged and incorporated by reference as fully set forth herein.

43. On or about January 30, 2024, and continuing until in or around the date of this Indictment, in the Middle District of Florida and elsewhere, the defendant

RAED YOUSEF,
a/k/a RAED MOHAMED SALIM SULEIMAN,

transmitted and transferred funds, that is, United States currency held in bank accounts, from a place inside the United States, that is, Florida, to a place outside the United States, that is, France, with the intent to promote the carrying on of specified unlawful activity, that is, providing material support to a terrorist organization, in violation of 18 U.S.C. § 2339B(a)(1), and willfully contributing funds, goods and services to or for the benefit of a Specially Designated Terrorist, namely, HAMAS, in violation of 50 U.S.C. §§ 1701-1706, as specified in each count below:

Count	Approximate Date	Amount	Recipient
14	On or about January 30, 2024	$957.19	Co-Conspirator 1
15	On or about March 12, 2024	$2,395.67	Co-Conspirator 1
16	On or about August 3, 2024	$2,383.85	Co-Conspirator 1
17	On or about March 8, 2025	$3,000.00	Co-Conspirator 1
18	On or about July 23, 2025	$2,000.00	Co-Conspirator 1

In violation of 18 U.S.C. §§ 1956(a)(2).

COUNT NINETEEN
(Passport Fraud)

44. The allegations in paragraphs 1 through 29 of this Indictment are realleged and incorporated by reference as fully set forth herein.

45. On or about July 29, 2024, in the Middle District of Florida, the defendant,

RAED YOUSEF,
a/k/a "RAED MOHAMED SALIM SULEIMAN,"

did knowingly and willfully make a false statement on a Form DS-82, Renewal Application for U.S. Passport, with the intent to induce and secure for his own use

the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, to wit, in such Application, the defendant stated that he had not used any other name besides "Raed Yousef" when the defendant knew that he had in fact used the name "Raed Mohamed Salim Suleiman."

In violation of 18 U.S.C. § 1542.

FORFEITURE

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of 18 U.S.C. §§ 981(a)(1)(C) and (G), 28 U.S.C. § 2461(c), and 26 U.S.C. § 5872(a).

2. Upon a conviction of a violation of 18 U.S.C. § 2339B(a)(1), as alleged in Count One through Two of this Indictment, the defendant,

RAED YOUSEF
a/k/a "RAED MOHAMED SALIM SULEIMAN"

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense; and pursuant to 18 U.S.C. § 981(a)(1)(G) and 28 U.S.C. § 2461(c), (a) all assets of the defendant, foreign or domestic; (b) all assets of the defendant acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing any Federal crime of terrorism; and (c) all assets of the defendant derived from, involved in, or used or intended to be

used to commit any Federal crime of terrorism. The assets to be forfeited include, but are not limited to, approximately, $51,258.67.

3. Upon conviction of 18 U.S.C. § 1956, as alleged in Counts Five through Six of this Indictment, the defendant,

RAED YOUSEF
a/k/a "RAED MOHAMED SALIM SULEIMAN"

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense; and pursuant to 18 U.S.C. § 981(a)(1)(G) and 28 U.S.C. § 2461(c), (a) all assets of the defendant, foreign or domestic sent from a place with the United States, namely, the Middle District of Florida, to places outside the United States, including France, the West Bank, and Gaza, as well as monies that were destined for places outside the United States, with the intent to promote the carrying on of a specified unlawful activity, to wit, material support to a foreign terrorist organization, and willfully contributing funds, goods, and services to, or for the benefit of, a Specially Designated Terrorist Group.

4. Upon a conviction of a violation of 18 U.S.C. § 1542, as alleged in Count Seven of this Indictment, the defendant,

RAED YOUSEF
a/k/a "RAED MOHAMED SALIM SULEIMAN"

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6)(a)(ii)(I), any property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly from the commission of the offense or traceable to the offense;

and pursuant to 18 U.S.C. § 982(a)(6)(a)(I) and (ii)(II), shall forfeit to the United States any property, real or personal that was used to facilitate, or is intended to be used to facilitate, the commission of the offense.

5. If any of the forfeitable assets described above, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

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

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

[redacted]

Foreperson

GREGORY W. KEHOE
United States Attorney

By: _____
Daniel Baeza
Assistant United States Attorney
Chief, National Security and
International Narcotics Section

By: _____
Lindsey Schmidt
Assistant United States Attorney

FORM OBD-34
September 26

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

RAED YOUSEF
a/k/a "RAED MOHAMED
SALIM SULEIMAN"

INDICTMENT

Violations: 18 U.S.C. § 2339B(a)(1); 50 U.S.C. §§ 1701-1706; 18 U.S.C. § 1956(h); 18 U.S.C. § 1956(a)(2); 18 U.S.C. § 1542

A true bill,

[redacted]

Foreperson

Filed in open court this 15th day

of September, 2026.

Amanda Craig

Amanda Craig Clerk

Bail $_____