 **SEALED**

# UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

United States of America
v.

ABDEL ADHAMI

*Defendant(s)*

Case No. 26-mj-112

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2021 to present in the parish of St. Tammany in the Eastern District of Louisiana, the defendant(s) violated:

| *Code Section* | *Offense Description* |
|---|---|
| 18 U.S.C. § 2339B | Material Support to a Foreign Terrorist Organization |
| 18 U.S.C. § 1343 | Wire Fraud |
| 18 U.S.C. § 1956 | Money Laundering |

This criminal complaint is based on these facts:

see attached Affidavit

☑ Continued on the attached sheet.

*s/Scott Foster*
*Complainant's signature*

Special Agent Scott Foster, FBI
*Printed name and title*

Sworn to before me and signed in my presence.

Date: September 11, 2026

*Janis van Meerveld*
*Judge's signature*

City and state: New Orleans, Louisiana

Honorable Janis van Meerveld, U.S. Magistrate Judge
*Printed name and title*

**UNITED STATES DISTRICT COURT**
**EASTERN DISTRICT OF LOUISIANA**

**SEALED**

| | | |
|---|---|---|
| **UNITED STATES OF AMERICA** | * | **MAG. NO. 26-mj-112** |
| **v.** | * | **DUTY MAGISTRATE** |
| **ABDEL ADHAMI** | * | |

* * *

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, **SCOTT FOSTER**, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a SPECIAL AGENT (SA) with the FEDERAL BUREAU OF INVESTIGATION (FBI) and have been since July 31, 2022. I am currently assigned to the FBI New Orleans Joint Terrorism Task Force (JTTF) where I work a variety of national security matters, specifically threats and acts of domestic and international terrorism. Before I was a SA with the FBI, I served as a Staff Operations Specialist with the FBI from 2014 – 2022 and specialized in international and domestic terrorism. Since being employed by the FBI, I have been trained to recognize potential threats of violence and support for Foreign Terrorist Organizations (FTOs) emanating from the internet. I have training and experience utilizing FBI tools to research a subject's social media accounts. In my experience, individuals involved in the Subject Offenses

utilize social media and other internet applications to articulate threats of violence towards individuals they dislike, or espouse support for FTOs. Often, individuals will utilize encrypted applications such as Telegram and WhatsApp to articulate threats of violence.

2. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. As further set forth below, I am conducting an investigation into violations of Title 18, United States Code, Section 2339B, Title 18, United States Code, Section 1343, Title 18, United States Code, Section 1956, by **ABDEL ADHAMI**, (W/M, DOB xx-xx-1991).

## APPLICABLE STATUTES

4. Title 18, United States Code, Section 2339B, prohibits, in pertinent part, a person from knowingly providing "material support or resources to a foreign terrorist organization," or attempting or conspiring to do the same.

> The term "material support or resources" means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel . . . , and transportation, except medicine or religious materials." 18 U.S.C. §§ 2339A(b)(1), 2339B(g)(4). Section 2339B(h) provides that "[n]o person may be prosecuted under this section in connection with the term 'personnel' unless that person has knowingly provided, attempted to provide, or conspired to provide a foreign terrorist organization with 1 or more individuals (who may be or include himself) to work under that terrorist organization's direction or control or to organize, manage, supervise, or otherwise direct the operation of that organization. Individuals who act entirely independent of the foreign terrorist organization to advance its goals or objectives shall not be considered to be working under the foreign terrorist organization's direction and control."

5. Title 18, United States Code, Section 1343, provides in pertinent part:

> "Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both."

6. Title 18, United States Code, Section 1956 provides in pertinent part:

> "Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity—
>
> **(A)**
>
> **(i)**
>
> with the intent to promote the carrying on of specified unlawful activity; or
>
> **(ii)**
>
> with intent to engage in conduct constituting a violation of section 7201 or 7206 of the Internal Revenue Code of 1986; or
>
> **(B)** knowing that the transaction is designed in whole or in part—
>
> **(i)**
>
> to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; or
>
> **(ii)**
>
> to avoid a transaction reporting requirement under State or Federal law, shall be sentenced to a fine of not more than $500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than twenty years, or both. For purposes of this paragraph, a financial transaction shall be considered to be one involving the proceeds of specified unlawful activity if it is part of a set of parallel or dependent transactions, any one of which involves the proceeds of specified unlawful activity, and all of which are part of a single plan or arrangement."

## PROBABLE CAUSE

7. As detailed below, I respectfully submit there is probable cause to believe that Abdel Adhami ("Adhami") uses personal mobile devices, social media, and other online accounts to coordinate and send monetary funds to individuals who promote HAMAS's terrorist agenda and raise funds in support of HAMAS. In particular, based on my training and experience investigating terrorist groups, activities, and financing; my involvement in this investigation; my conversations with other law enforcement officers; and my review of law enforcement reports and other records, including public sources, financial records and records obtained from electronic communications service providers, as well as publicly available information posted on social media accounts, I believe, in substance and among other things, the following: Adhami utilized a personal mobile device—registered with phone number 941-726-9750—to access his social media and financial accounts, most notably his Snapchat and PayPal accounts, to engage in activity related to the Subject Offenses.

### HAMAS and the October 7 Attacks

8. On October 8, 1997, the United States Secretary of State designated HAMAS as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act. On October 31, 2001, the Secretary of State also designated HAMAS as a Specially Designated Global Terrorist under Executive Order 13224. 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.

9. Based on my review of publicly available information, including documents and video recordings made available on social media, my conversations with other law enforcement agents, and my participation in this investigation, my review of law enforcement records, I have learned, in substance and among other things, the following:

a. At approximately 6:30 a.m. local time in Israel on or about October 7, 2023, the day after the fiftieth anniversary of the commencement of the 1973 Yom Kippur War, HAMAS breached the border between the Gaza Strip and Israel, infiltrated Israel, and launched a wave of attacks on civilians, by land, sea, and air (the "October 7 HAMAS Attacks"). As part of its coordinated attacks, HAMAS used drones to drop grenades on Israel's observation towers and remotely operated machineguns in order to incapacitate parts of Israel's infrastructure for monitoring the Gaza/Israel border and responding to breaches of the security fence around Gaza. Israeli sources reported that HAMAS also launched at least 3,000 projectiles into Israel from Gaza. At least five people were killed by those initial rocket and artillery attacks. A large cadre of HAMAS terrorists simultaneously infiltrated Israel from Gaza using a variety of vehicles and crafts, including trucks, motorcycles, bulldozers, speedboats, and paragliders. The HAMAS terrorists entered Israel through at least seven locations and invaded several Israeli communities, the border city of Sderot, and two Israeli military bases. Armed HAMAS operatives massacred and shot civilians, including with machineguns, sometimes at point blank range, carrying out attacks in areas in southern Israel, including at a music festival in the Negev desert and at residential communities known in Hebrew as "kibbutzim."[1] During the October 7 HAMAS Attacks, HAMAS terrorists weaponized sexual violence against Israeli women, including rape and genital mutilation.

[1] A "kibbutz," which refers to the Hebrew word for "gathering," is a type of residential compound common in certain parts of Israel typically organized to promote communal living. Many kibbutzim originated as agricultural or religious communities, but today include a wide diversity of economic projects and industries and are now largely secular communities.

Hundreds of civilians, including Americans, and Israeli soldiers were killed and wounded; others, including 7 Americans, were kidnapped, taken hostage, and brought into Gaza by HAMAS.

b. In connection with the initiation of October 7 HAMAS attacks, the supreme military commander of the al-Qassam Brigades, Mohammed Al-Masri, a/k/a "Mohammed Deif," a/k/a "al Khalid al-Deif," issued a recorded message in which he "announce[d] the 'Al-Aqsa Flood' operation" - the operation name given by HAMAS to the October 7 HAMAS attacks - and "call[ed] on Palestinians everywhere . . . to launch an attack without restraint. Go to all the streets. I call on Muslims everywhere to launch an attack."

10. Based on my review of publicly available information, my conversations with other law enforcement officers, and my participation in this investigation relating to HAMAS, I have learned, among other things, that there is evidence that HAMAS and its leadership had been planning the October 7 HAMAS attacks, including by raising funds for HAMAS, since as early as 2021, following the last major conflict between HAMAS and Israel. For example, on or about October 8, 2023, the day after the October 7 HAMAS attacks had begun, Ali Baraka, a member of Hamas's senior leadership, appeared in a video interview aired on a Russian television outlet, during which Baraka stated, among other things, that HAMAS had "been preparing for this [i.e., the October 7 HAMAS attacks] for two years."

**HAMAS's Use of Social Media and Financing Efforts**

11. Based on my involvement in this investigation, my conversations with other law enforcement officers, and my review of law enforcement reports and other records, as well as publicly available information posted on social media accounts, I have learned, in substance and among other things, the following:

a. HAMAS has a significant media and online presence, through which it furthers its terrorist agenda. For example, 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 Twitter and Telegram accounts.

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

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.

d. HAMAS also relies, in part, on purported "charitable" organizations and efforts, located around the world, to raise money, including through the "charitable" organizations' own social media accounts.

**Adhami and Alzaq Use Online Accounts to Solicit Money and Support HAMAS**

12. As described below, there is probable cause to believe that Adhami utilizes online accounts to discuss pro-HAMAS topics and coordinate collection and distribution of funds to support HAMAS with an individual named Saleem Alzaq. Social media posts by Adhami's and Saleem Alzaq's social media accounts indicate support for HAMAS and efforts to solicit funds to Gaza for purported charitable ends. Based on my training and experience, knowledge of HAMAS's efforts to disguise funds as purported charitable donations, review of posts by Adhami's and Alzaq's social media accounts, financial records revealing money sent from Adhami

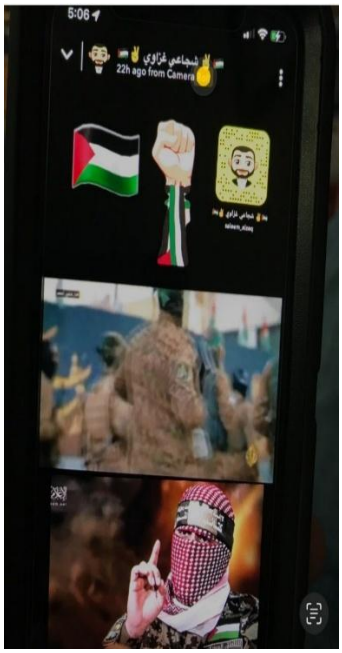
to Alzaq's associate and another individual in Gaza, and conversations between Adhami and Alzaq, there is probable cause to believe Adhami's involvement in the Subject Offenses.

**Alzaq Snapchat Accounts**

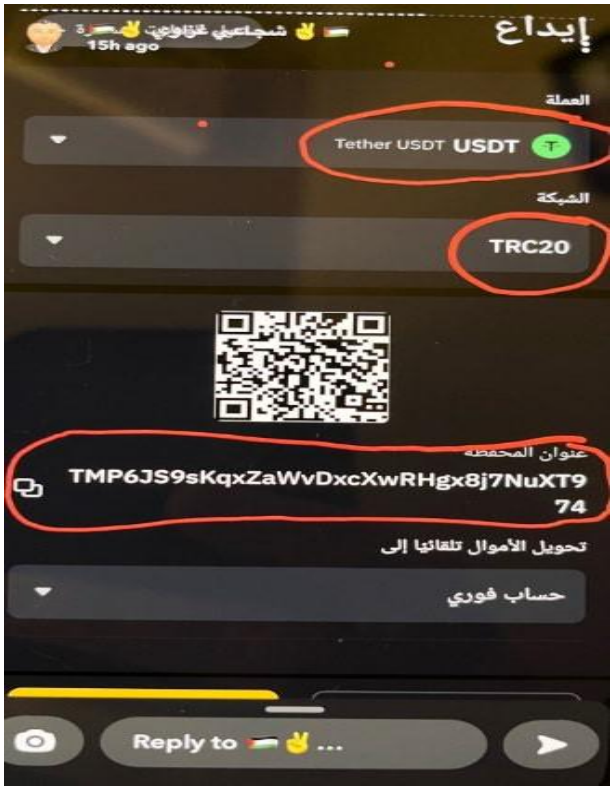
13. From in or about 2021 through at least in or about November 2025, Snapchat accounts "saleem_alzaq"; "saleemalzaq2023"; "saleem_alzaq003"; and "saleemalzaq12" (the "Alzaq Snapchat Accounts") periodically posted HAMAS propaganda and, in the case of at least one of the Alzaq Snapchat accounts (the "saleem_alzaq003" account), referred followers to a Telegram account (the "gaza02023 Telegram Account"). Based on records provided by Snapchat, and my review of publicly available portions of the Alzaq Snapchat Accounts, which include, among other things, livestreaming and postings which I believe, based on my training and experience and my review of public sources, to depict activities in Gaza, I have learned that Saleem Alzaq, the apparent user of the Alzaq Snapchat Accounts, appears to be based in Gaza. The "gaza02023 Telegram Account" almost exclusively posted pro-HAMAS and pro-Palestinian Islamic Jihad messages, videos, and images, while soliciting donations, including through the [redacted] a purported charity founded after the October 7 HAMAS attacks.

a. For example, on or about March 23, 2021, Snapchat account "saleem_alzaq" posted the following photograph of Sheikh Ahmed Yassin, who was the founder and a leader of HAMAS:

b. On or about May 28, 2022, "Saleem_alzaq" posted videos promoting HAMAS activities, including HAMAS fighters carrying weapons and engaged in militant action, screenshots of which are depicted immediately below. Based on my training and experience and my review of public sources, I understand that the clothing depicted in the screenshots below is used by HAMAS fighters, the patch depicted in the first screenshot signifies the HAMAS organization, and the individual wearing the red keffiyeh represents now-deceased HAMAS spokesperson Abu Obaida. The postings mentioned above are below:



c. On or about October 14, 2023, "Saleem_alzaq" solicited donations via a cryptocurrency wallet associated with the cryptocurrency exchange Bybit (the "Alzaq Bybit Wallet"), which is a United Arab Emirates-based cryptocurrency exchange, as shown below. The items circled in red (by law enforcement) show the wallet address, blockchain (i.e., TRC20, reflecting the TRON blockchain), and the cryptocurrency denomination (USDT, reflecting Tether).




d. Following this post, "Saleem_alzaq" substantially reduced the frequency of posts involving HAMAS propaganda. In or about this timeframe, Snapchat account "Saleem_alzaq003" referred followers to a Telegram channel posting HAMAS propaganda. In addition, on or about March 5, 2024, "Saleem_alzaq003" reposted the cryptocurrency wallet described and screenshotted immediately above.

e. Based on records provided by Snapchat and review of public postings, "Saleemalzaq2023" was created on or about October 30, 2023, and was removed several weeks following its creation. As described further below,

based on my review of public postings from the account, during 2023, "Saleemalzaq2023" posted pro-HAMAS messages.

f. On or about November 7, 2023, "Saleemalzaq2023" posted a message in Arabic which is depicted below:

g. Based on my review of a draft translation prepared by an Arabic interpreter, I understand the post depicted above states:

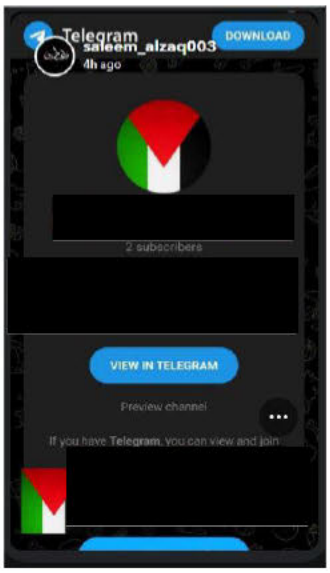
> Major General Fayez Al-Duwairi [a retired military general of the Jordanian Armed Forces]: After 30 days of violent bombardment and 11 days of ground invasion, the Israeli Army tanks are still standing still and have only advanced a few meters, and the army has not yet achieved any real breakthrough into the Palestinian defenses or any military achievement on the ground! What the Palestinian fighter is doing is something extraordinary that we have never seen before.

h. The post included a depiction of an upside-down red triangle, which I know, based on my training and experience and my participation in this investigation, symbolizes solidarity with HAMAS and other terrorist groups fighting Israeli forces.

i. On or about December 24, 2023, the Snapchat account "Saleem_alzaq003" posted the following downward red triangle image, which, based on my training and experience and participation in this investigation, I understand signifies solidarity with HAMAS and other terrorist groups fighting Israeli forces, alongside a Palestinian flag:

j. On that same date, the "Saleem_alzaq003" Snapchat account posted a link to the "gaza02023 Telegram Account," as shown below on the left. According to my review of a draft English translation prepared by an Arabic interpreter, the Arabic texts states, "Shujaei Ghazawi. Media personality and social activist. Report all the news of Palestine and the events of Gaza in particular. I collect donations for the poor and orphans in Gaza." Based on my training and experience, I understand "Shujaei Ghazawi" to be a reference to a person from a particular place in Gaza. Shown below on the right is the biography accompanying the Telegram channel, which contains identical text in English. In addition, the "gaza02023 Telegram Account" posted the QR code and username associated with the "Saleem_alzaq003" Snapchat account. Based on my review of the "gaza02023 Telegram Account," I have learned that the "gaza02023 Telegram Account" was created on or about October 8, 2023, (i.e., the day after the October 7

HAMAS attacks) and contains almost exclusively pro-HAMAS and jihadist content. The gaza02023 Telegram has several messages "pinned" to it, including links to the donation page of the [redacted] website, www.[redacted] and to the "Saleem_alzaq003" Snapchat account.



k. Examples of pro-HAMAS propaganda postings appearing on the linked "gaza02023 Telegram Account" include the following postings from in or about November 2023, (which are a sample of hundreds of other pro-HAMAS postings reflecting HAMAS propaganda from this time of account creation to the present). Based on my training and experience, I understand that the first posting below contains an image of an al-Qassam Brigades[2] fighter and states "al-Aqsa Flood" (as discussed above, the al-Aqsa Flood is the operation name given by HAMAS to the October 7 HAMAS attacks). The second posting below reflects a screenshot from video footage taken from an official al-Qassam Brigades media outlet, as shown by the writing in the upper left of the screenshot, a draft translation of which I have

[2] 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.

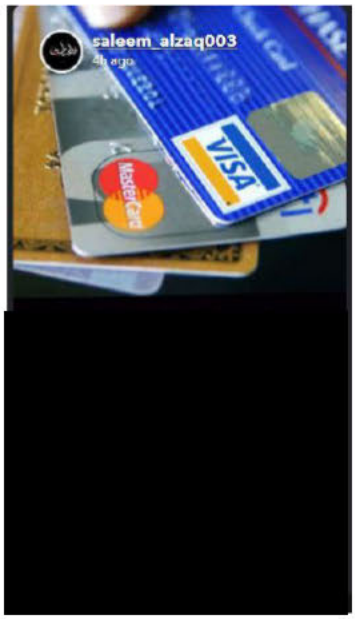
reviewed, and shows gunfire in Gaza from the October 7 HAMAS attacks. The third posting below depicts a HAMAS fighter with a weapon. I have reviewed draft English translations of the Arabic writing on the image and the caption prepared by an Arabic interpreter. The writing on the image states, "So watch them and be patient," and the caption reads, "Al-Qassam Brigades publishes on its Telegram channel." The fourth and final posting below depicts a HAMAS fighter and an exploding tank, with the words, as indicated by a draft translation from Arabic, "Abu Obaida: A large elite force consisting of 25 mujahedeen carried out a complex massacre on the occupation forces that held up Al-Rantisi Hospital and some of the mujahedeen were martyred and the remaining ones returned to their bases safely."[3] Based on my training and experience, I know that Abu Obaida was a spokesperson for HAMAS, and the upside down red triangle shown in that post symbolizes solidarity with HAMAS.

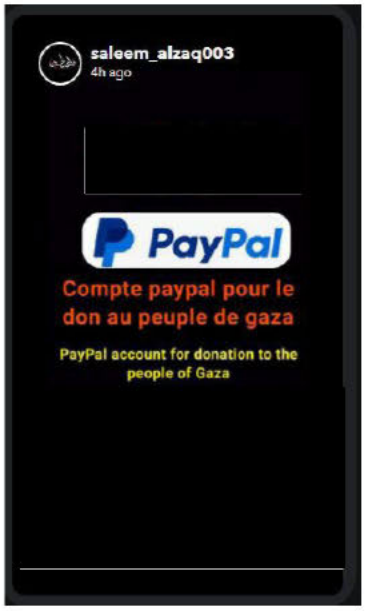
[3] Based on my training and experience, and my involvement in this investigation, I know that the "occupation" refers to Israel and that "mujahedeen" is an Arabic term often used for those who have pledged to wage jihad, or holy war, and which has been adopted by terrorist organizations such as HAMAS to refer to militants who commit acts of terrorism.

l. In or about this same timeframe, the "Saleem_alzaq003" Snapchat account posted requests for donations for "the people of Gaza" through the PayPal account of his financial associate, [redacted] the "@[redacted] ayPal Account"), and further advertised the so-called [redacted] The "Saleem_alzaq003" Snapchat account also has posted images of physical locations containing advertisements for [redacted] These posts are shown below. Based on my review of an official [redacted] government website,[4] I believe that [redacted] was founded on or about

[4] *See* https://www.[redacted] (last visited July 3, 2025).

October 13, 2023. According to the website, the organization's activities are to "Provide support by all types of means for the most deprived in Africa and the Middle East and elsewhere in the world, financial, material and physical aid; raise first aid funds; helps pay all or part of their primary needs food rent clothing health care; create wells, participatory projects."[5] The [redacted] website contains a link to the official [redacted] website described above and contains the same description,[6] however, the website currently further states that, "In view of the current situation our only action at the moment is to provide food or cash to civilians in Gaza who are in need when our team is on site. When we can we cook meals which we distribute to the refugees, you will have all the information on our brother's Snapchat on site when he has network."[7]




[5] The writing on the website appears in [redacted] and the translation was performed by the browser enabled translation feature, which matched the English mission statement on the [redacted] website.

[6] *See* https://www.[redacted] (last visited July 3, 2025). The contact information given for [redacted] includes the email address, contact [redacted] and phone number, [redacted]

[7] *See* https://www.[redacted] The [redacted] website contains a feature permitting review in English. The quotations from the website appearing in this affidavit are based on the website's English-language feature.

14. Similarly, the "gaza02023 Telegram Account" (as noted above, linked to the "Saleem_alzaq003" Snapchat account) also solicits donations by periodically posting links to the @[redacted] PayPal account and the donation page for [redacted] www[redacted].[8] The "gaza02023 Telegram Account" also repeatedly posts links to the [redacted] Telegram channel, t.me/[redacted]. The [redacted] channel, in turn, contains links to the "gaza02023 Telegram account", the donation page for [redacted][9] and what appears to be Alzaq's current Snapchat account

[8] While this website is different than the [redacted] website at www.[redacted] I believe both websites are associated with [redacted] ue to the similarity in descriptions contained on both websites, the fact that both websites pertain to [redacted]' and the fact that both websites contain the same contact email, contact@[redacted] and contact phone number, [redacted] the "[redacted] Number").

[9] The [redacted] Telegram channel also contains a link to the official [redacted] website cited in footnote 4.

(for example, the channel has linked to the "Saleem_alzaq003" Snapchat account but has since been updated to link to other Snapchat accounts with display names that contain variants of Alzaq's name).

**Adhami Solicits Money on Instagram**

15. As detailed below, Adhami's Instagram posts also indicate support for HAMAS and attempt to solicit funds for individuals in Gaza. Based on my review of records provided by Instagram, I know that Instagram account "@abedadhami" was registered using email address keetom.kanadi.91@gmail.com, an email address that Instagram has verified (which, according to my training and experience and review of public sources, is done to ensure that only the rightful owner can access and manage the Instagram account at issue, and to assist in the event the user forgets his/her password or needs to recover the account).

16. Based on review of Adhami's Instagram account "@abedadhami", which is publicly available, Adhami posted images that depict individuals with weapons and green headbands that are commonly worn by members of HAMAS, or its affiliate, the 'Izz al-Din al-Qassam Brigades. Additionally, based on my training and experience and my review of public sources, I understand that the patch on the squatting individual on the right of the picture holding a weapon depicted in Instagram post on October 13, 2023, signifies the 'Izz al-Din al-Qassam Brigades organization.

a. On or about October 13, 2023, the following still photo representing a video was posted by Instagram account "@abedadhami" (translation of Arabic text in photo: "The maneuver that materialized"):

b. On or about October 12, 2023, the following still photo representing a video was posted by Instagram account "@abedadhami" (translation of Arabic text in photo: "Prayer of the Mujahidin"):

c. On or about 16 October, 2023, Adhami advocated for individuals to send money to Gaza via Western Union, which is seen in the following post to Instagram account "@abedadhami" (translation of Arabic text in photo: "Brothers…Anybody that would like to donate to our afflicted brothers in Gaza or wants to send a money transfer to this woman can contact me and rest assured that it will reach those it belongs to. I guarantee it. The one leading to good deeds is just as good as the one doing the good deed…They need us now"):

**Adhami Sends Money To Alzaq's Associate and Gaza**

17. Based on records received from PayPal, Inc., beginning on or about November 4, 2023, through on or about June 1, 2025, Adhami sent approximately $34,672.41 to a PayPal account ( [redacted] registered to an individual named [redacted][10], who is located in [redacted]. The email address registered to the PayPal, Inc. account is keetom.kanadi.91@gmail.com, an email address PayPal, Inc., has verified, and the phone number 941-726-9750, a phone number PayPal, Inc., has verified. Based on my review of records provided by T-Mobile, Abdel Adhami is the registered user of phone number 941-726-9750.

18. Based on records received from PayPal, Inc., beginning on or about January 12, 2025, through on or about February 15, 2026, Adhami sent approximately $46,600 to a PayPal

[10] Based on my training and experience, my conversations with other law enforcement agents, linguists, my participation in this investigation, my review of documents, the conversation between Abdel Adhami and Alzaq articulated in paragraph 25e referencing Alzaq's contact in [redacted] and Alzaq's "Saleem_alzaq003" snap post of [redacted] aypal account referenced in paragraph 17, I believe [redacted] is Alzaq's financial associate.

account (@[redacted] registered to an individual named [redacted] who is located in [redacted] s a known associate of Saleem Alzaq, who has sent money directly to Alzaq in Gaza.

19. Based on records provided by Western Union, on or about October 16, 2023, Adhami sent $2,000 to an individual named Sondos Abdalkareem Alzaq, who picked up the money in Gaza on or about October 19, 2023. The telephone number and email address Adhami utilized for the transaction were 941-726-9750 and keetom.kanadi.91@gmail.com, respectively.

**Adhami Snapchat Account**

20. Based on my review of records provided by Snapchat, I know that account "aadhami56" was registered using email address keetom.kanadi.91@gmail.com, an email address that Snapchat has verified (which, according to my training and experience and review of public sources, is done to ensure that only the rightful owner can access and manage the Snapchat account at issue, and to assist in the event the user forgets his/her password or needs to recover the account), and the phone number 941-726-9750, a phone number Snapchat has verified.

**Adhami's Communications with the Alzaq Snapchat Accounts**

21. Based on records provided by Snapchat, from on or about June 20, 2023, through on or about June 9, 2024, Adhami and Alzaq communicated on Snapchat with text and audio clip messages. Based on review of translations of the text and audio clip messages sent between Adhami and Alzaq, which were in Arabic, both individuals regularly discussed pro-HAMAS topics and coordinated collection and distribution of funds to support HAMAS.

22. Additionally, based on my training, experience, and review of the records and information provided, I note Adhami and Alzaq utilized codes to hide the true nature of their conversation at times. The dialogue in text and audio clips demonstrates both individuals

understand the activity is in support of HAMAS, and their discussions include tactics to evade law enforcement detection and discovery of the movement of funds.

a. For example, on or about October 18, 2023, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleem_alzaq" stating the following:

> Hello, first of all, thank God for your safety. I, I mean, I was worried about you because I tried to contact you yesterday all day long, but you did not respond and you did not post any stories. I know that the Internet there is light and it is hard to connect to the net. [Sighs] But, we really got worried about you and eh . . . what you call it? And thank God we heard your voice and we got reassured that you are fine. I want you to know that our hearts, minds and eh . . . everything we have are with you, but "God never burdens a sou--a soul beyond its capacity," I wish we could come, I wish we could help you, I wish we could do Jihad with you, you are the people of Jihad, you are the people of perseverance, you are who the Prophet, peace and prayer be upon him, has mentioned. Congratulations, congratulations, you are the free ones, not us eh . . . and let me know when you receive the wire transfer. If there is anything we can do, our lives and money and everything are at your service.

b. On or about November 4, 2023, Snapchat account "saleemalzaq2023" sent a voice message to Snapchat account aadhami56, stating the following:

> Hello 'Abdel, how are you? Pardon me, this is the account—they deleted my old account, the account got blocked. You know how Snapchat is, they fight us and they delete the activists on social media. As activists in Gaza that publish the news of Gaza, so they deleted and blocked me. This is my new account, this is my new account and I hope you publish it, I really wish you can publish it, I mean I beg you to publish it to the groups and the WhatsApp as well.

c. On or about November 4, 2023, Snapchat account "saleemalzaq2023" sent a voice message to Snapchat account aadhami56, stating the following:

> Brother 'Abdel, I sent you the one eh . . . eh . . . my WhatsApp. Please add me on WhatsApp and tell me this is your brother 'Abdel Adhami just in case the account is lost we can communicate on WhatsApp.

d. On or about December 7, 2023, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleem_alzaq003" stating the following:

> If there is anything I can offer eh . . . that helps or anything, I am ready. Myself, my money, my blood, my time and everything are for you my brother. By the way, I can do a transfer to you, but I am not going to tell you that I will transfer to you because you told me last time eh . . . I mean I send you the balance, but as long as it gets to you.

e. On or about December 29, 2023, Snapchat account "saleem_alzaq003" sent a voice message to Snapchat account aadhami56, stating the following:

> No worries, my dear, and I will explain to you right now why. First of all, prayer be to God's Prophet. The PayPal is [redacted] it has nothing to do with Gaza. That is number one. If it was related to Gaza, the account would have been closed on day one. That is the first thing I want you to know. This is [redacted] from the state of [redacted] It belongs to people, young men, friends located in [redacted] They are my friends. When you first transfer through this PayPal, you transfer to [redacted] My friend over there, through the PayPal—he has an association—of course a benevolent association—not his—his and mine together. We established it at the beginning of the war, [redacted] Through the association—there is also a second PayPal for the association. Meaning there are two PayPals, we aggregate what's in PayPal in his bank account, in his bank account, at the bank in [redacted] How do I receive here from his bank account in [redacted] Through cryptocurrency. There are digital platforms over there, Bitcoin, USDT, Ethereum and such things, I mean the cryptocurrency. My friend buys the cryptocurrency, which is the USDT and he transfers them to me USDT, which means Dollars, he transfers them to Dollars. There are exchange agents here that transact, but of course all the codes, numbers, and things are encrypted. Nobody in the world could know where the money went. Through this encrypted code, I go to the exchange agent, exchange agent, meaning not banks, exchange agents, people, even young men with money, exchange agent. I give him the code and he gives me—of course he takes his commission: one percent, two percent of the amount of money and I receive the amount of money. That is all the matter. If anybody wants to inquire, tell them not to worry,

> your money will go to [redacted] and from [redacted] they buy cryptocurrency and the cryptocurrency comes to Gaza. It is a secret I just told you about.

f. On or about January 19, 2024, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleem_alzaq003" stating the following:

> Assalmu Alaikum, Brother, Abu Abdallah. How are you? How is everything? Hopefully everything is well with you. Honestly brother I have a dream I don't know if you can make it true or not. I want to buy a piece of bread, give it to someone and throw this piece of bread to our cousins. Do you understand me? By God, it is my dream. I feel myself as if I made something. Can you make it come true or are you unable to?

g. On or about January 19, 2024, Snapchat account "saleem_alzaq003" sent a voice message to Snapchat account aadhami56, stating the following:

> Hello, oh dear, one. Assalamu Alaikum, hope you are well. By God, things have changed from the past about those of the bread and those who you send them bread. The situation has become very very difficult. There is no way to be in touch with them, that's because first of all, the internet is disconnected, secondly the separation of North Gaza from Central Gaza, we who live in Central Gaza are undergoing pressure, in al-Maghazi, in al-Braij. The situation is very very difficult. Different from once before. But, I promise you when things calm down I'll tell you, "yes, man," and deliver you the bread to the bread people. I understand, yes. I understand every word you say. But right now, honestly is very difficult, honestly. But, in the future I will deliver anything to them.

h. On or about January 28, 2024, Snapchat account "saleem_alzaq003" sent a voice message to Snapchat account aadhami56, stating the following:

> And, dear one, I want to tell you something. Part of, I don't want to say all of it, part of amount that you sent me arrived to the bread people. This is with God's grace. After being disconnect we were able to be in touch with them. The bread people, you understand me. Thanks be to God. Thanks be to God. Thanks be to God. Their situation was difficult. They pray for the person who donated this bread, they pray for everything good and they say 'May God grace him from His

> greatest graces.' This is the message I wanted to deliver to the person who donated the bread. This is the thing I wanted you to know. They are the ones present in North Gaza. North Gaza we mean they are present at al-Shifaa Hospital in al-Shujaia neighborhood, al-Sheikh Radhwan, the north, Beit Hanoon, Beit Lahia, these areas. Some of them received the bread, thanks be to God.

i. On or about February 1, 2024, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleem_alzaq003" stating the following:

> May God be pleased with you, my brother, and may God make you victorious. By God whatever one does he remains falling short toward you. I swear by God. I am in a state of rage, in an upset state, and in a state of extreme sadness because I can't be there with you in person. I honestly . . don't want . . I want to be there by myself. By God, every time I see one of the bread people do something . . . Or . . I would wish I was there with him. I wish I was there with them on the same line. And when I hear that one of them was chosen by God and requested the deed[11], I would wish . . I would pray, and pray to God say 'Oh, God, unite me with him near the pool with our Lord, Muhammad, May peace Be Upon Him. My wish is to be there. I don't want to be here. By God, if they open this crossing, by God I will be the first one. But what can I do. I ask God almighty that I be one of those who make Jihad with their money. (Sigh) By God, I swear by God who is no God but He . . By God who permissed swear by his name only, I was praying a little ago the afternoon prayer, and I did the supplication worship prayer and I prayed for the entire nation and for the Mujahideen, and for all the people and I prayed God that I join them. No matter what I do I fall short. I know myself, I'm falling short.

j. On or about February 3, 2024, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleem_alzaq003" stating the following:

> But I would like to try that--that people do not give me cash. Why? Because when they give me cash, let's say 1,000.00 Dollars a month, people, all the people give me 1,000.00 Dollars. I have to deposit this 1,000.00 Dollars into my

[11] Based on my training and experience, "the deed" appears to be a reference to martyrdom.

> account. Honestly, I am a businessman, I have stores, and I try to stay away from the cash. We have an issue over here with cash. I want them to deposit the amount of money directly into my account or transfer it directly to the association in a way that I am not involved, I stay away from this matter. I do not want them to keep giving me cash, because I have to tax on the cash as well, and if the cash becomes a lot, the government might come and ask me: 'Come, you keep depositing a lot of money cash into your account. Where is this amount of money from? You tell me that your store-you claim in your tax that you have made 10,000.00 Dollars cash this month, but you deposited 12,000.00 Dollars cash. Where did the 2,000.00 come from?' You know what I mean? They do not check on such small amounts of money, but when the amount of money is very big. It will be good, God willing.

k. On or about February 3, 2024, Snapchat account "saleem_alzaq003" sent a voice message to Snapchat account aadhami56, stating the following:

> Brother 'Abed, you know, praise be to God, you beat me to it. I also was going to tell you to be careful because you are not in Gaza, you are in a country eh…like they say, they hold you accountable even for a dollar. So, when you take, you have to be careful about who you take from, and when someone donates, who donated, in such a way to preserve yourself my brother, this is a priority. I don't know much about the cash matters and taxes. If, God forbid, there is a tax then you can, for example, if someone sends 1,000.00 Dollars, you don't have to send me a thousand dollars, a thousand dollars, for example, I don't know what's the system--for example send 950.00 Dollars only, just like that. I do not know what is the system like over there, but be careful brother and take care of yourself within the limits of not hurting yourself. That is the most important thing for me. You are a dear brother to me and I don't want to see any human being getting hurt. May God reward you.

l. On or about February 14, 2024, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleem_alzaq003" stating the following:

> I am following your Snaps step by step everyday when I wake up, I open [your page] and I watch everything, and Praise be to God and praise be to God, may God provide and bless. But I want to ask you, the bread people, do they need

> anything? Are they short on anything? Everything is well, God willing? They, my dear, we must take care of them, we must kiss their boots. May God protect them and make them victorious.

m. On or about August 23, 2024, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleemalzaq12" stating the following:

> [sharp noise] Hello Abu 'Abdallah. Listen! I have a request to ask you. I rely on God and on you that you try to fulfil it. Do not tell me that you cannot. Try, for God's sake, try and then if you tell me that you couldn't eh, that you couldn't do it then that's it I will accept it. The request is that you go to the bread people and you tell them there is a human being that was supporting us from the beginning of the war and you tell them the story, one, two, three. All that this guy wants from you is a loaf of bread that you throw to the other people in his name. That is it, I swear by God that I will not ask for more than that. My name written on it and you throw it. And whatever you want, God bless you, I know that you, that they are selling it for the sake of God, glory be to him, but I still think that you, God bless you…my dream, my dream…I want it.

n. On or about August 23, 2024, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleemalzaq12" stating the following:

> Whoever wants to throw it, himself and his entire family, whatever they want. I swear, it is from the bottom of my heart, from the bottom of my heart. Just write my name on it, "Al-Adhami," and throw it…and that's it. Whatever he wants, God bless him. Eh…I mean, I know that [sighs] money is not everything in life, but this is all I could do and the one who wages Jihad with money is also considered a Jihadist. Anything that you want, will be granted, but he… just needs to do this thing for me.

o. On or about September 3, 2024, Adhami, via Snapchat account aadhami56, sent a voice message to Snapchat account "saleemalzaq12" stating the following:

> May God be pleased with you and help you Abu 'Abdallah. I swear to God, the matter of eh…that I want, just like

> that…[sighs] I mean something in the heart, honestly, I am not able to describe it. As for getting hurt and such, I want to get hurt. No offense, but they will go to heaven and receive God's satisfaction, while I fall short. And if there is a way I could go inside, I swear by God that I would. I mean, I want to do more than just money. I…that's it, you know my point of view. I am ready for anything, but in front God, lord of worlds—when I stand before God, lord of the worlds, and I say: "O God"—this bread—this loaf reach-- those people from me. It is true that I did not throw it myself, but I did my due diligence.

23. Based on my conversations with other law enforcement agents, linguists, my participation in this investigation, my review of documents, and my training and experience, I note the discussion of "bread" utilized in the above-mentioned messages is not a reference to food, as noting the kissing the boots of the bread people and the wishing the bread people are victorious. Additionally, I know that "al-Shifaa Hospital" mentioned by Snapchat account "saleem_alzaq003" where the bread people are present, is a reference to the Al-Shifa Hospital located in Gaza. The Al-Shifa Hospital was raided by Israeli forces in November 2023 and April 2024, and was alleged to be a command-and-control center for HAMAS. Additionally, the consideration of disguising funds by paying a tax on a donation in order to avoid detection demonstrates the individuals' knowledge that the activity is potentially illegal.

**Identification of Adhami's Mobile Device**

24. On September 10, 2025, Adhami arrived at the George Bush Intercontinental Airport in Houston, Texas on a flight originating overseas. During a secondary inspection conducted by the U.S. Customs and Border Protection (CBP), CBP detained Adhami's Apple iPhone 14 Pro (IMEI: 354615756408354, Serial: KQ0W74G92X), hereafter Subject Device, and conducted a border search of the Subject Device, which included a forensic extraction.

## Adhami's WhatsApp Communications

25. Based on records provided by WhatsApp, WhatsApp account 941-726-9750 was registered on December 15, 2022 with email address keetom.kanadi.91@gmail.com, an email address that WhatsApp has verified. An Apple iPhone 14 Pro was the last known device connected to WhatsApp account 941-726-9750 as of May 21, 2025. A review of the information obtained during CBP's border search of the Subject Device revealed WhatsApp account 941-726-9750 was loaded onto the device, and over 300,000 WhatsApp messages for account 941-726-9750 were found.

26. On or about November 4, 2023, Adhami, utilizing WhatsApp account 941-726-9750, sent an audio message to his brother, Omar Adhami (hereafter Omar) who utilized WhatsApp account 504-616-1216, which stated the following:

> Omar, listen! I was talking with that guy[12] and I told him, one helps the children, and those in need, but what can one do for our brothers, those guys, the true men, do you understand me? And he told me not to worry, we are giving them as well. Every time we are in possession of sum of money, or if someone sends us money, we cook a meal and give the true men portion of the meal. So, I told him if that is what you do, I then will transfer money to you on daily basis, God willing. If one sends $10 or $20 a day, because the prophet said, "He who equips a fighter is as if he has taken part in the fighting himself." So, I myself will transfer money to him on daily basis, God willing. I will send whatever amount I can afford. I dedicated myself and portion of everything I have to the true men, and the other portion for the children and those in need. When you talk to him, do not say like that. He uses the word "bread". So, when you want to send something, you tell him, "This amount for the bread", and he will understand. Don't mention anything by its name on WhatsApp and use the word "bread" instead. You can say, "This amount for the bread, two dozens of bread, or May God strengthen the bread! Or something like that.

[12] Based on my conversations with other law enforcement agents, linguists, my participation in this investigation, my review of documents, and my training and experience, I know the reference to "that guy" is likely referring to Saleem Alzaq.

27. On or about November 4, 2023, Adhami, utilizing WhatsApp account 941-726-9750, sent an audio message recording from Saleem Alzaq to his brother, Omar who utilized WhatsApp account 504-616-1216, which stated the following:

> Brother, don't mention specifics! You can say portion for "bread", and I will understand what you mean. That is how we communicate. You can say, this for the bread, we need bread, we would like to send some bread, we need bread, or anything similar to that. We communicate this way among ourselves. I will send you the "PayPal" link, and you can try to send $5, or $10 first, and you can also ask those who know how it works.

Adhami then immediately sent Omar a hyperlink (https://paypal.me/[redacted] to Alzaq's PayPal account "@[redacted]

28. On or about November 4, 2023, Adhami, utilizing WhatsApp account 941-726-9750, sent an audio message recording from Saleem Alzaq to his brother, Omar who utilized WhatsApp account 504-616-1216, which stated the following:

> For your information, regarding the bread people, we have sent them a lot of bread, and we have arranged everything with them, because everyone is in a bad place. The bread reaches them, and they pray for you, and for everyone. Portion of what we receive goes to the children, the refugees, and the people in need, and other portion goes to the bread people.

**Online Covert Employee Conversations with Saleem Alzaq and Abdel Adhami**

29. On or about November 26, 2025, a New York City Police Department (NYPD) online covert employee (OCE) was contacted via SnapChat by Saleem Alzaq, who utilized SnapChat account "@Saleemalzaq2425". Alzaq requested the NYPD OCE send donations to the children of Gaza via PayPal to the link "https://PayPal.[redacted] On or about December 03, 2025, the NYPD OCE and Alzaq engaged in the following conversation via SnapChat:

NYPD OCE: [text] May the peace and mercy of God be upon you. I like what you do a lot. How can I send a donation?

Alzaq: [text] May God bless you. What country are you living in, so I can give you the easiest way.

NYPD OCE: [text] I'm in New York. PayPal blocked me.

Alzaq: [audio] [inaudible] Brother, God bless you and God accept you. There is a way in New York through USDT or through Western Union. I can send you a name. The name is not direct to Gaza. I send you the name and it's through Egypt, or through any country and they bring it to me, but also through the USDT, it uses bitcoin. I send you a link to USDT and you send it and it comes immediately.

NYPD OCE: [audio] May the peace and mercy of God be upon you. We can send money through Egypt, but cash would be so much easier because I have a store and everything is done in cash.

Alzaq: [audio] No worries, no problems. My friends are in New York, so many of them; they are in New York and in the state of Ohio and all over the United States. How do you send to each other? If you want, I can get you an account of someone in America, send to them, from account to account, from an American account to an American account. What way do you prefer so I can get you the account or the information for my friend? And as soon as you send, they will send it to me through PayPal. God bless you, my brother.

NYPD OCE: [audio] Peace be upon you. The best thing would be cash. I have the money here on me. Someone can pick them up anytime.

NYPD OCE: [audio] And if someone is local, I can deliver to them myself. The most important thing is the money get to you.

Alzaq: [audio] God bless you my brother Hussain. Ok, let me see my friends in New York, and they are all from Palestine, from the West Bank and from Jerusalem, and they are American, all of them; they are young people and they send me all the time. They never fall short with us, they fund us, there are no problems. I will contact one of them, but I want to ask, I apologize for this question my brother, but I want to know the amount, so I can tell them and see if they would go or not, things like that you know, if it's an easy thing or a difficult one, so I know. You send and it all comes directly to me, so if anyone picked it up, they will immediately transfer it to me through PayPal, USDT [inaudible]. There is more than one way.

NYPD OCE: [audio] Peace be upon you. I will collect from my brother and my friends, and it can be one thousand, two thousand, around that amount, but please I want to send it with someone you trust.

Alzaq: [audio] My dear brother, I'm telling you, it's people who send me the donations. Their job is this, that they send me, this is their job. And I told you, if you want to send through a [credit] card you can send, someone who has a store, a friend of mine, as if you were purchasing supplies from them or purchasing anything, using a Visa card or Mastercard, one thousand or two thousand dollars . You collect from your friends and put them in your account, it's up to you, and if it's cash, it's not a problem. I have to check and make sure who has cash, sorry, I mean who can pick up cash, and I give them your address or your phone number or WhatsApp, and you can connect with each other for example. Whatever you want, I am ready for.

30. On or about December 04, 2025, the NYPD OCE and Alzaq engaged in the following conversation via SnapChat:

NYPD OCE: [audio] May the peace and mercy of God be upon you. I talked to my brother and he told me he will put the money on his card and he can go to the store like you said, as if he was purchasing something.

NYPD OCE: [audio] He will come meet me tonight in the store. I have the money. I will give it to him, $2200. God willing, I am sending.

Alzaq: [text] 941-726-9750

Alzaq: [audio] Peace be upon you my brother, and God may bless you my brother, and God may send you 1000 blessings, my brother Hussain. This is my friend's number Abed Al-Adhami. This is his WhatsApp number and his regular number. Call him and come to an understanding with him and see what's the best method, how to transfer, how to send them [funds]. This young man transfers to me on monthly basis. All he does is he transfers to me; he said give him my number and have him contact me and we will figure a solution out very easily, as long as he is in American, in a state and I am there, we will figure it out.

Alzaq: [text] Abed Al-Adhami

Alzaq: [audio] All good my brother Hussain. Contact him and call him and tell me what happens between you two, and God protect you and him.

31. On or about December 04, 2025 and December 05, 2025, the NYPD OCE and Adhami engaged in the following conversation via WhatsApp:

NYPD OCE: [text] May the peace and mercy of God be upon you. Mr. Saleem sent me your number to contact you and send you money.

Adhami: [text] Peace be upon you

Adhami: [text] God bless you

Adhami: [text] Where do you live

NYPD OCE: [text] In New York

NYPD OCE: [text] Thank God, I'm very happy with the work they do. God give them strength

Adhami: [text] Ok can you Zelle

NYPD OCE: [text] To be honest no. He said I can pay with a card or cash.

Adhami: [audio] Peace upon you. If the money is available in the account, instead of paying me with a card, you can pay me with Zelle. You must have Zelle; maybe you don't know that you have it, as long as you have a bank account, you have Zelle, brother.

Adhami: [audio] If you send the amount through Zelle, it's very easy; in seconds, I will have the amount. There are no fees, there are no transfer fees also; just by putting my number and you put the amount you want and a message, that's all. Nothing is easier than that. The whole operation takes less than one minute.

NYPD OCE: [audio] The money is going to be cash because my store operates in cash. My brother has Barclays Bank, and he told me they do not have Zelle. He tried to look into the Zelle thing.

Adhami: [audio] I understand you, I understand you. This means, in this case, there are only two solutions. Either cash, and to be honest, I cannot go to New York to pick them [the money] up, and it must be difficult for you to come to Louisiana to give them [the money] to me, and I wouldn't want that for you. There is only transferring, wiring, from your account to my account, or if you would like, you can put them [the money] in your account, and after you can send it through PayPal, Cashapp, or Venmo, anything, internal transfer.

NYPD OCE: [audio] May the peace and mercy of God be upon you, my brother. Blessed Friday. What about the card thing he told me about? I don't like things on computers and electronics and all this. They can follow them.

Adhami: [audio] May the peace and mercy of God be upon you. The first thing you should know is that this group is recognized in the United States and everything is a hundred precent legal. Me personally, I give God the one. If you want, I can send you a statement. Me personally, every month, I transfer $3500-$4000, even before the war I transfer, and thank God nothing has happened. You are going to transfer to a charitable organization, and the money goes to [redacted] and from [redacted] Abu Abdullah has access to the account, and he uses them in Gaza. The card thing he

told you about is if you want, I can, you can put the money in your bank account, and after, you call me and you give me the card number as if you were a customer going into my store. I charge you the amount you want, you give me the card details, and I put them into the cash register that I have in the store and the money goes into my bank account. I take them [the money] and transfer them to Abu Abdullah and I sent you an invoice and a receipt. I send you videos where the money went and who received them, and everything is a hundred percent.

Adhami: [text] But do not worry everything is legal, God willing.

NYPD OCE: [audio] Peace be upon you. Ok I talked to my brother and he will come take the money and do the card thing.

Adhami: [audio] May the peace and mercy of Allah (God) be upon you. Ok good, God willing all good. God accept from you, multiply your money, and compensate you. God, God willing all this is on the scale of your good work. You are building up your house in heaven God willing.

32. On or about December 05, 2025, Alzaq sent the below message to the NYPD OCE via SnapChat:

Alzaq: [audio] I called my friend and he told me what happened [inaudible] Zelle, but if it doesn't work, it's okay. Do it in the way of a credit card. Give him the card as if you were buying from him, but contact him, but God bless you, contact him, and get it done. Get the money taken out of the card as he said, and that's it. If Zelle is not working, that's it, as if you were buying something from his store. I think he talked to you and he talked to your brother, meaning it's easy, as you were with the same way as discussed. God willing it will work. You guys are on the top of my head. It's important you talk to him.

## CONCLUSION

33. Based upon the facts above, your Affiant submits there is probable cause to believe that, **ABDEL ADHAMI** was in violation of Title 18, United States Code, Section 2339B, Title 18, United States Code, Section 1343, Title 18, United States Code, Section 1956. Affiant also

prays that the Court will issue an arrest warrant for **ABDEL ADHAMI** for said violations. Your Affiant swears that the aforementioned information is true and correct to the best of his knowledge.

Respectfully Submitted,

*/s/ Scott Foster*
Special Agent Scott Foster
Federal Bureau of Investigation

Pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3), the undersigned judicial officer has on this date considered the information communicated by reliable electronic means in considering whether a complaint, warrant, or summons will issue. In doing so, I have placed the Affiant under oath, and the Affiant has confirmed that the signatures on the complaint, warrant, or summons and affidavit are those of the Affiant, that the document received by me is a correct and complete copy of the document submitted by the Affiant, and that the information contained in the complaint, warrant, or summons and affidavit is true and correct to the best of the Affiant's knowledge.

Subscribed and sworn to before me on
this 11th day of September, 2026,
New Orleans, Louisiana.

Janis van Meerveld
Honorable Janis van Meerveld
United States Magistrate Judge